



**PT HALMAHERA PERSADA LYGEND**

**2023**

**Sustainability Report**



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# ABOUT THIS REPORT

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

## Pioneering progress: Our commitment to sustainable nickel processing

**PT Halmahera Persada Lygend (“PT HPL”) continues to expand our robust framework for sustainable, low-carbon nickel processing while we continue to scale our high-pressure acid leaching (HPAL) operations in Indonesia. This year, we experienced significant growth in operations and built the internal capacity required to enhance our processing capabilities in line with our sustainability objectives. Research and analysis have been crucial for building on our foundation to ensure that PT HPL continues to model sustainability through its responsible mineral processing practices.**

Welcome to PT HPL’s 2023 sustainability report, presenting stakeholders with the company’s sustainability performance for the year. We are an associate company of PT Trimegah Bangun Persada Tbk (“PT TBP” or “Harita Nickel”), with operations within the PT TBP complex. Our policies, measures, and frameworks are aligned with Harita Nickel, as well as with our Hong Kong-listed majority shareholder, Lygend Resources & Technology Co., Ltd. (“Lygend” or “Lygend Resources”) (See our [website](#), the [PT TBP 2023 Sustainability Report](#), and [Lygend Resources ESG Report 2023](#)).

This report has been prepared with reference to the latest relevant reporting frameworks and benchmarks, as well as requirements in Hong Kong and Indonesia. These are:

- The latest **Global Reporting Initiative (GRI) Standards**, with reference to the draft **GRI Sector Standards for Mining** (GRI disclosures are included throughout the document and referenced under headings or subheadings as GRXXXX-XX. See [GRI Content Index](#)).

- The **International Financial Reporting Standards Foundation (IFRS) Sustainability Standards** (See [IFRS Index](#)) which includes:
  - The **Sustainability Accounting Standards Board (SASB) standard on Metals and Mining** (SASB disclosures are included throughout the document and referenced under headings or subheadings as SASB-EM-MMXXX. See [SASB Index](#)).
  - The Taskforce on Climate-related Financial Disclosure (TCFD) recommendations.
- The 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 Financial Services Authority Regulation (POJK) No. 51/POJK.03/2017 on Sustainable Finance for Financial Institutions, Issuers, and Public Companies.

This report also maps our contributions to selected **United Nations Sustainable Development Goals (SDGs)** and relevant targets (See [Contributing to the SDGs](#)).

Unless otherwise stated, the data in this report covers January 1 to December 31, 2023, and is supported with historical benchmark data where available and relevant. Performance data reporting covers our organizational boundaries, including material aspects for third-party suppliers and contractors. Independent limited assurance was provided by KAP Purwantono, Sungkoro & Surja ([KAP PSS – EY] a member firm of Ernst & Young Global Limited) on selected GRI Standards indicators, specifically entry-level wages, water discharge, water consumption, and generated waste. Additionally, GHG emissions and energy data were assured against the ISO 14064-1:2018 and the GHG Protocol Corporate Accounting and Reporting Standard (revised edition) by PT Intertek Utama Services.<sup>1</sup>

- See [Limited assurance statement](#).

<sup>1</sup> Limited assurance was undertaken for [Harita Nickel’s 2023 Sustainability Report \(PT TBP SR2023\)](#), of which scope covers PT HPL.



# MESSAGE FROM THE DIRECTOR OF PT HPL

[GRI 2-22]

Dear stakeholders,

It is with great pride that I present PT HPL's 2023 Sustainability Report.

Reflecting on the past year, I am reminded of the immense progress we have made in our unwavering commitment to sustainability, delivering long-term value for all our stakeholders while contributing to a more sustainable future. PT HPL remains a cornerstone within the Harita Nickel Group and a distinguished representative of Lygend's flagship HPAL processing operation.



In 2023, we reached a significant milestone by advancing further downstream with the production and export of nickel and cobalt sulfate products. This evolution, driven by Indonesia's 2019 nickel export ban, challenged us to innovate and develop robust processing capabilities. Through the guidance of international experts and the dedication of our team, we successfully navigated this complex transition, establishing ourselves as Indonesia's first and the world's largest nickel and cobalt sulfate production facility. The addition of a third production line in January significantly increased our production capacity, achieving full operational capacity within just two months.

The global energy transition and decarbonization of transport drive demand for battery supply chain materials. With Lygend's support, PT HPL is proud to contribute to this critical social change. Our goal is to become a global leader in responsible nickel processing, with a strong focus on environmental stewardship and social responsibility. Our

sustainability commitments are firmly aligned with Harita Nickel's 2023 Group-wide Sustainability Policy, adhering to international standards and responding to the needs of downstream buyers, including battery manufacturers and automotive OEMs, who require sustainably processed nickel products.

Our off-grid location challenges us to adopt innovative energy solutions. But with Lygend's expertise, and collaboration we continue to build a comprehensive decarbonization strategy. In line with this, we remain committed to Harita Nickel's decarbonization targets of reducing emissions by 30% by 2030. Leveraging Lygend's technological expertise, we are advancing solar projects, implementing waste heat recovery technology, electrifying heavy goods vehicles, and embracing the government-led biodiesel initiative. These initiatives are complemented by ongoing research and analysis to improve energy efficiency and achieve measurable emissions reductions.

We adhere to national environmental regulations and strive for compliance with widely-recognized best operational practices such as the RMI RMAP, which measures our compliance with international supply chain standards. By enhancing our internal processes, improving efficiency, and implementing sustainable governance, we aim to achieve certification across all business areas.

Our commitment to environmental management is demonstrated by our certifications, including SMK3 and ISO 14001 and 45001 for quality and environmental management. Additionally, Lygend is ISO9001 compliant, underscoring our dedication to excellence.

Aligned with Harita Nickel's Responsible Sourcing Policy, we require all suppliers, vendors, and contractors to sign an integrity pact and undergo rigorous ESG assessments. While PT HPL is not located in a Conflict-Affected and High-Risk Area (CAHRA), we assess our suppliers for human rights and environmental risks in line with IRMA Standards, RMI RMAP guidance, and OECD Due Diligence Guidance. Our participation in the Group's human rights due diligence assessment in September 2023 reflects our commitment to continuous improvement.

We are building capacity with our supplier training programs, aiming to complete training for all raw materials suppliers by 2025. Hosting multiple stakeholder site visits this year allowed us to showcase our operations, welcome audits, and demonstrate our dedication to sustainability and transparency.

PT HPL maintains long-term partnerships with ten village communities on Obi Island, supporting social and economic development through initiatives in education, health, socio-culture, infrastructure, and economic development. These efforts are integral to our strategy to mitigate the potential impacts of nickel extraction and processing on the community.

In conclusion, our genuine desire for sustainability is reflected in our projects, initiatives, and expert teams. Together with Lygend Resources Ltd., PT HPL has demonstrated resilience and adaptability. We will continue to create value and align with our stakeholders' sustainability targets in 2024. I am grateful for the support of stakeholders, local communities, media, academic partners, and downstream stakeholders.

We extend our gratitude to our dedicated teams in China and Indonesia for their outstanding contributions to the success of 2023.

**Tonny Gultom**  
*Director, PT HPL*



# MESSAGE FROM THE DIRECTOR OF LYGEND

Dear stakeholders,

On behalf of the Board of Directors of Lygend Resources & Technology Co., Ltd., I am pleased to present PT HPL's 2023 Sustainability Report. This report highlights our achievements over the past year, showing our continued commitment to sustainability as a vital pillar of business continuity. It is our belief that mature businesses must take an expansive view of sustainability, one that considers environmental, social and governance concerns as inseparable from financial performance.

As an organization, we are particularly proud of our efforts to embed sustainability into the strategic objectives of each department. The progress of sustainable operation is a continuous journey; and our corporate culture is one of open-mindedness and sharing. These are natural catalysts for exciting and innovative corporate dynamics. I have been very pleased to see this ethos of transparency both within our departments, and as we engage more extensively with external stakeholders including our Indonesian partners.

I want to take a more targeted approach and discuss the priorities identified by some of our most important stakeholders – our buyers. These issues are Waste, Air quality, Ecological impact, Pollution, and Climate Change.



In the area of waste and hazardous materials, we continue our innovative research into tailings management, focusing on adding value through further mineral extraction. We have also made significant advancements in repurposing materials, starting with efficient classification systems; one notable result being a new metal waste recycling program.



**Our sustainability achievements are the fuel powering our resilience to market challenges, and our commitment to growth is irrevocably linked to our ESG commitments. By considering business continuity and sustainability as inseparable measures of success, we truly prepare ourselves for the future.**



Water-related enhancements to the HPAL process include the use of wastewater instead of freshwater at the limestone grinding and washing stage. Additionally, we have revamped the limestone grinding system to fully recycle lime nitrification residues, decreasing waste and lowering costs. In the area of sanitation, we have also implemented reductive measures including advanced filtration technology for water recycling.

Air quality is a priority in our operations, which include smelting and will inevitably cause some impact on air. We are actively mitigating these emissions with desulfurization equipment, the installation of electrostatic precipitators (ESP), back filters for fly ash bottom ash (FABA) silos, and boilers with low nitrogen oxide emissions.

Our newly formed ESG Committee will use international best practice frameworks to create operational guidelines and governance structures to achieve everything above, including the development of a Sustainability Policy in the coming year.

Climate change is a critical ESG issue for us. To support Indonesia's and PT TBP's goal of reaching net zero by 2060, we are enhancing the accuracy of our greenhouse gas emission trend monitoring. Our system offers early warnings to help us to implement emissions reduction improvements. At PT HPL, we also use a "Greenhouse Gas Monitoring Plan Procedure" to standardize emission data collection and reporting.

Of course, we do all of this to create value for our buyers in an increasingly stringent market. Downstream stakeholders must also meet ESG commitments as part of their own supply chain requirements which demand alignment with responsible sourcing standards. PT HPL uses a "Supplier Management Standard" to standardize the screening and evaluation of potential suppliers and to further demonstrate the implementation of best practice responsible sourcing frameworks, PT HPL have initiated the process for assessment against the Responsible Mineral Initiative Responsible Minerals Assurance Process (RMI RMAP), and the facility will achieve 'Conformant' status in 2024.

Finally, to address the more financially focused matters required to ensure sustainable business, in 2023, we enhanced business continuity and further contributed to the global energy transition by launching a third HPAL production line which quickly reached full production capacity. Also, we commenced the operation of the world's largest nickel and cobalt sulfate production facility. The result of this expansion is something we can all be proud of; Indonesia's first battery-grade, nickel and cobalt sulfate production and export chain. This demonstrates our capacity to meet international quality standards and solidifies our role in the battery manufacturing industry supply chain. These developments strengthened our market resilience and paved the way for future growth.

In the coming year, we will remain committed to enhancing our technology, processes, and structures to improve efficiency, embed sustainability, maintain our competitive edge, and address market risks. Our objectives are to increase product value and diversify our business while aligning with industry standards wherever possible.

We greatly value the ongoing support from our stakeholders as we navigate future challenges and opportunities.

**Shi Wentang 石文堂**

*Director, PT HPL; General Manager of HPL Site  
Lygend Resources & Technology*

# SUSTAINABILITY SUMMARY 2023

## OPERATIONS AND STRATEGY

<p>Indonesia's <b>first</b> and the world's <b>largest</b> nickel sulfate processing facility</p> 	<p><b>Expanded</b> MHP production lines and sulfate processing facilities</p> 	<p>Adopted Harita Nickel's <b>Sustainability Policy 2023–2027</b></p>	<p>Achieved net profit of <b>USD 235.1 Million</b></p>
<p>Began conformance process against <b>Responsible Minerals Initiative Responsible Minerals Assurance Standards</b></p> 	<p>Continue to invite assessments against <b>international responsible sourcing standards</b></p>	<p>Certifications achieved:</p> <ul style="list-style-type: none"><li>• <b>ISO 14001</b> for environmental management systems (EMS)</li><li>• <b>ISO 45001</b> for occupational health and safety (OHS) management systems</li><li>• <b>ISO 9001</b> for quality management systems (QMS)</li></ul>	<p> • <b>Sistem manajemen keselamatan dan kesehatan kerja (SMK3)</b> - the national standard for OHS management.</p>

## GOOD GOVERNANCE

<p>Met all regulatory <b>thresholds</b> for water, waste, and air quality (no non-compliances)</p>	<p> Addressed <b>100%</b> of employee grievances raised in 2023</p>	<p> Adopted Harita Nickel's new responsible sourcing policy</p>
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## CLIMATE CHANGE

<p>Participated in <b>Harita Nickel's</b> Climate Change Risk Assessment and decarbonization project with <b>International Development Agency</b></p>	<p><b>Recycled and reused 990 Megaliters</b> of processed water back into operations</p>	<p><b>Avoided 307,988 tCO<sub>2</sub>E</b> of GHG emissions thanks to our waste heat recovery system</p>
<p>Installed new <b>real-time monitoring systems for air emissions (CEMS) and wastewater quality (SPARING)</b></p>	<p>Introduced <b>electric heavy goods vehicles (HGV)</b> at sulfate plant</p>	

## HUMAN RIGHTS

<p>Adopted new <b>group-wide human rights policy</b></p>	<p>Maintained our commitment to paying our entry-level male and female workforce <b>above minimum wage</b></p> 	
<p> Participated in Harita Nickel's human rights due diligence assessment in <b>Sept 2023</b></p>	<p>Our pledge to prioritize local workers continued with <b>38%</b> of total Indonesian workforce from North Maluku</p> 	<p>Expanded local supplier base to <b>43 suppliers</b> – up from 9 in 2020</p>



# ABOUT PT HPL

[GRI 2-1, 2-6, 3-3] [SASB EM-MM-000.A]



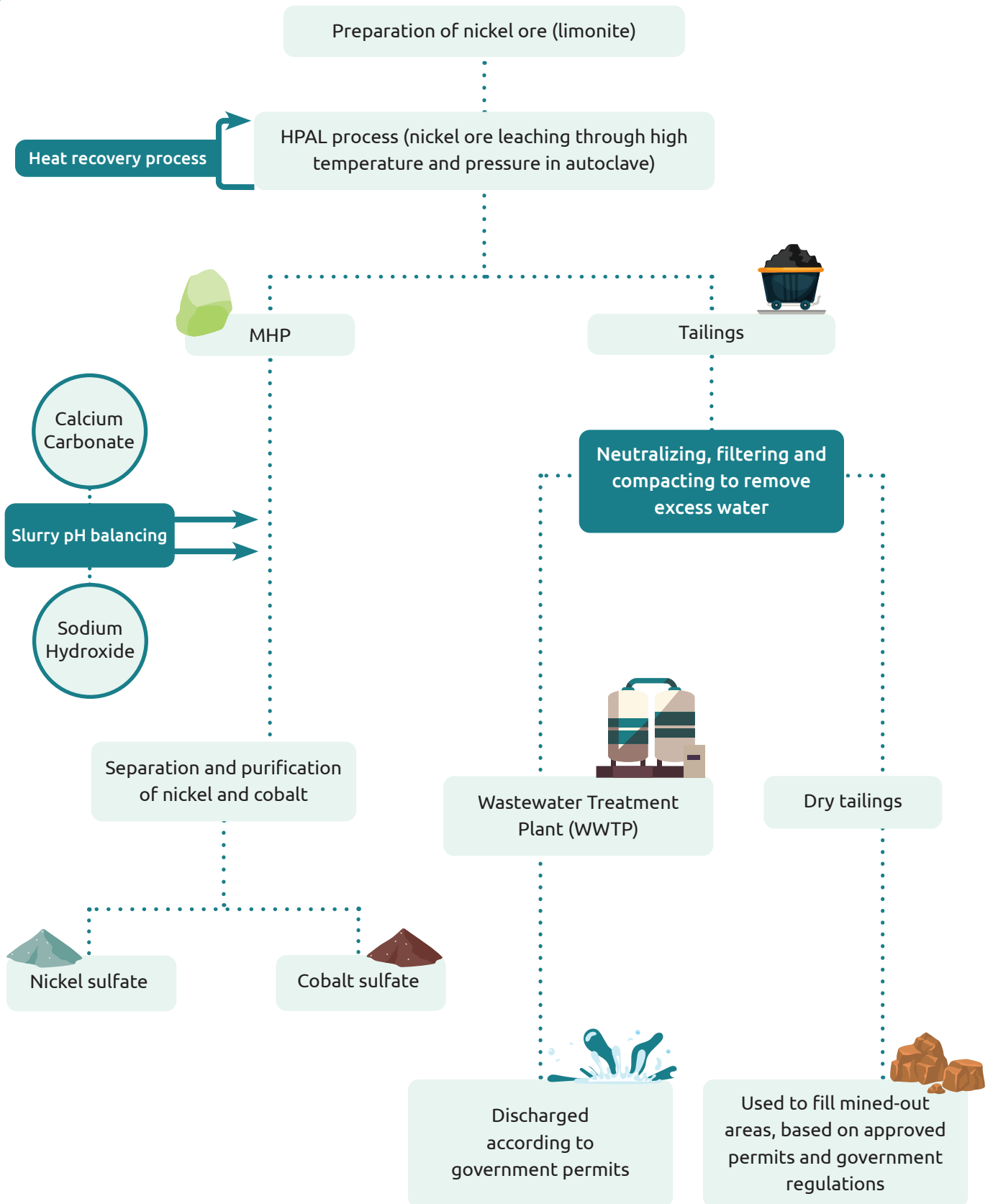
**PT Halmahera Persada Lygend (HPL) was founded in 2018 as a joint venture between PT Ningbo Lygend and PT Trimegah Bangun Persada Tbk (“PT TBP,” or “Harita Nickel”). Our headquarters are in Jakarta, and our operations are in Kawasi, Obi District, in the South Halmahera regency of North Maluku, Indonesia. We are a private limited company with majority shares held by Lygend Resources & Technology, Co. Ltd. (“Lygend” or “Lygend Resources”) (55%),<sup>2</sup> with the remaining owned by PT TBP (45%).**

We are the first operator in Indonesia to produce mixed hydroxide precipitate (MHP) with the rapid development of our state-of-the-art high-pressure acid leaching (HPAL) facilities. With this technology, we can process and refine mined limonite, a low-grade nickel ore, into products for the electric vehicle (EV) battery industry.



<sup>2</sup> Of this, Lygend Resources directly controls 36.9%, and their investment holding company, Kang Xuan Pte. Ltd., holds the remaining 18%.

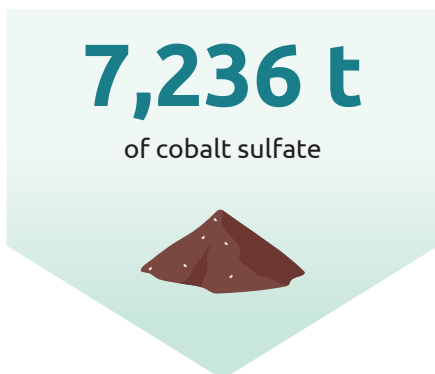
# The HPAL hydrometallurgical process



## ABOUT PT HPL

Since 2021, our enhanced production efficiency has enabled us to significantly increase our annual production capacity of high-quality MHP while simultaneously reducing our emissions intensity per ton of product. We have added a third MHP production line, which became operational in January 2023 and reached full capacity within two months. We also successfully ventured further downstream into nickel and cobalt sulfate processing from our produced MHP. We are proud to be the first in Indonesia and the world's largest nickel sulfate processing facility.<sup>3</sup>

By December 2023, PT HPL has produced:



## Contributing to Indonesia's national strategy

Indonesia has the largest nickel reserves in the world. Nickel-based products are a primary driver of the national economy and are the country's third-largest export commodity after coal and palm oil.<sup>4</sup> Supported by the technological expertise and experience of Lygend Resources, PT HPL plays a crucial role in Harita Nickel's resolve to become a global leader in supplying EV batteries, in line with Indonesia's 2060 net-zero ambitions.

We are the:

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

**1<sup>st</sup>**

HPAL plant in Indonesia, using low grade nickel ore deposit

**1<sup>st</sup>**

plant using dry stack tailing placement

**1<sup>st</sup>**

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

<sup>3</sup> The first nickel and cobalt sulfate processing line became fully operational in June 2023.

<sup>4</sup> Trade Statistics for International Business Development. (n.d.). [Trade map list of products exported by Indonesia.](#)

# OUR APPROACH TO SUSTAINABILITY

[GRI 2-23, 2-24]

In 2023, PT HPL adopted the newly launched [PT TBP Sustainability Policy](#), a comprehensive document outlining Group-wide ESG commitments and practices. We have also aligned our efforts with PT TBP's sustainability direction and expanded framework. Our operations have integrated these commitments while our suppliers and contractors will be subject to applicable provisions in our assessments. In light of the new policy, the PT HPL sustainability strategy covers:



Adopting PT TBP's policies with consistent sustainability objectives



Reducing potential negative environmental impacts and promoting sustainable operations



Integrating ESG into our 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 our sustainability agenda



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

- For details on PT TBP's targets and latest progress, please refer to the [PT TBP 2023 Sustainability Report](#).
- See the [Appendices](#) for our key actions that contribute to the SDGs.



# Harita Nickel's Sustainability Framework



## Climate change

### Land

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

### Air

Improving air quality to protect human, environmental, and economic health

### Water

Employing responsible water management practices and protecting ecosystems and marine life of our oceans and lakes

## Human rights

### People

Educating and developing the capacity of our employees

### Community

Optimizing the resources of surrounding communities through social engagement programs

### Indonesia

Building resilience by fighting poverty and maintaining social 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 safety

### Operational excellence

Encouraging sustainability by improving business performance with targeted management principles

We are currently focused on integrating Harita Nickel's Sustainability Policy into our existing standard operating procedures (SOPs).

# Materiality

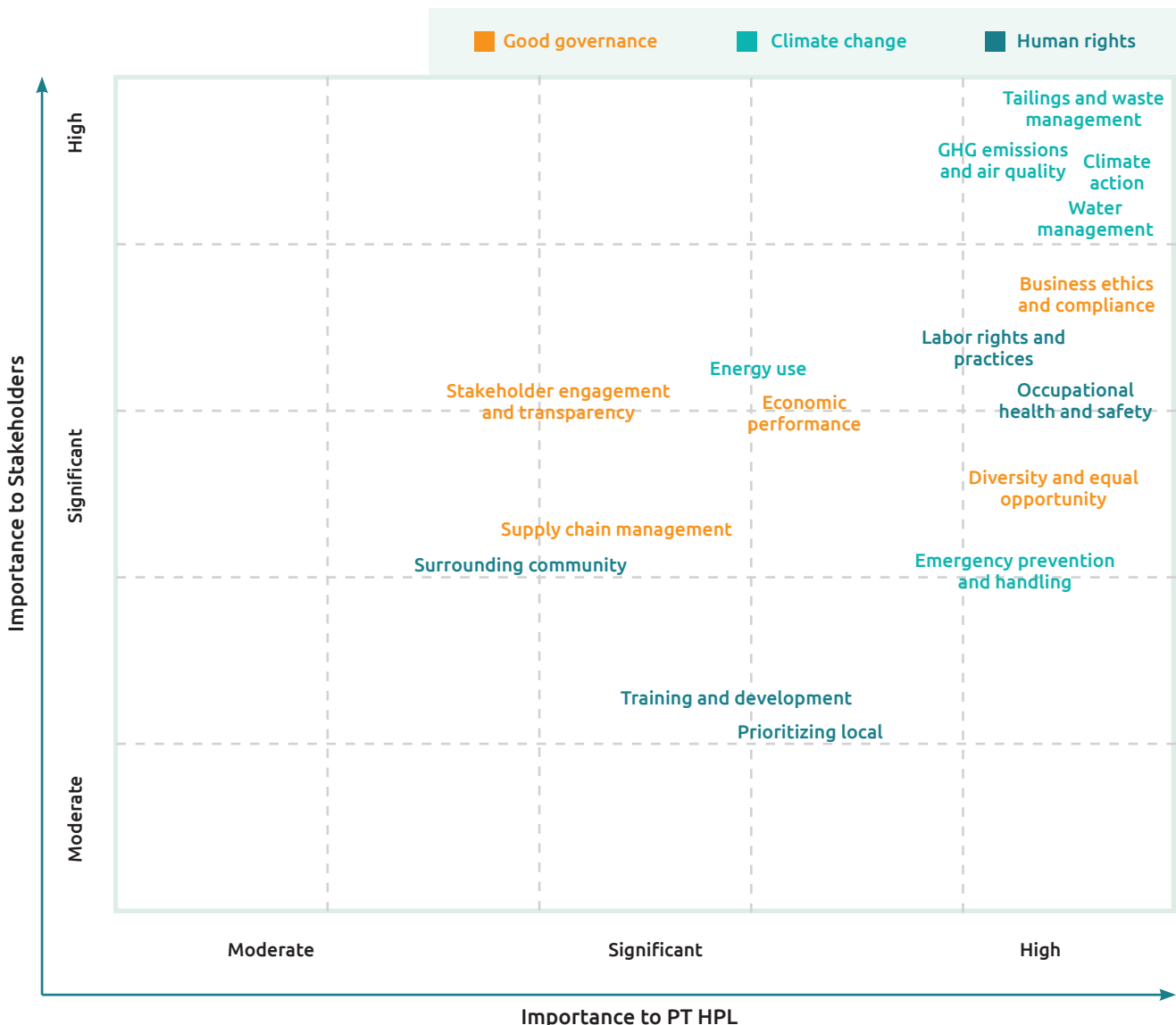
[GRI 2-14, 3-1, 3-2]

Our reporting covers the material topics or ESG-related issues that are most important to our business and stakeholders. We conducted our first materiality assessment to identify material topics for our 2021 ESG report then updated our material topics in 2022 and 2023 by adopting a proactive responsive approach to stakeholder requirements. This included direct engagement with both joint venture partners' selected external stakeholders and an extensive desktop review of industry platforms to determine critical challenges and developments relevant to operators in our geographical location.

Our efforts culminated in the following 2023 materiality matrix: 16 material topics mapped against the three pillars of PT TBP's Sustainability Framework: **Good governance, Climate change, and Human rights** then prioritized in order of importance to our stakeholders. We review our material topics during preparation of each sustainability report to ensure they remain up-to-date and relevant to the latest regulatory and market landscapes.

- See the [Appendices](#) for our materiality assessment process.

## 2023 materiality matrix



## Certification, Assurance, and Recognition

We remain committed to adopting world-class environmental, health, and operational safety management practices. **In 2023, PT HPL achieved the following certifications:**

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



In 2023, PT TBP began the process for assessment against the Initiative for Responsible Mining Assurance (IRMA) Standard for Responsible Mining with an objective of completing the assessment in 2025. The IRMA assessment applies to mine sites, not businesses. Therefore, it includes PT HPL within its scope due to our physical presence on the mine site, as per the IRMA definition.

PT HPL is also assessed against the Responsible Minerals Initiative Responsible Minerals Assurance Process (RMI RMAP) standards for smelters and refineries and is on track to achieve compliant status in 2024. This aligns with several other international standards, such as the OECD Due Diligence Guidance and European supply chain due diligence regulations, and will verify our practices, assuring customers that our supply-chain and sourcing practices are best in class.

➤ See [Supply chain management](#).

We also received the following awards:



Four-Star Award and Top Leader on CSR Commitment award at the Top CSR Awards 2023



2023 TrenAsia ESG award for the Smelter Category for Action



Joint Second prize with PT TBP for “Resilience and Sustainable Industry” in the best new industrial park category from the Indonesian Ministry Industry (*Kementerian Perindustrian Republik Indonesia*)

In 2023, Lygend was selected as the 2023 Global Nickel Series High-quality Supplier and appointed Honorary President Unit of the Fifth Council of Ningbo Charity Federation. These achievements reflect our shared dedication to support communities and deliver high-quality products and services.

➤ For details of other achievements or awards, please visit <https://www.lygend.com/media.html>

# GOOD GOVERNANCE

[GRI 2-9, 2-11, 2-12, 2-13, 2-14, 405-1]

PT HPL's corporate governance structure, practices, and sustainability values are embedded throughout our operations and reflect those of Harita Nickel. While managing sustainability initiatives for PT HPL and other subsidiaries and affiliates, Harita Nickel also works closely with Lygend, which oversees the majority of PT HPL's technical operations.

- For more information, see [Lygend's 2023 ESG Report](#) (p. 17) and [PT TBP's 2023 Sustainability Report](#) (p. 55).



## Aligning our ESG vision and governance

Commentary by  
Lygend Resources & Technology Co. Ltd.

As a subsidiary of Lygend, PT HPL must adhere to ESG requirements set out by the Hong Kong Stock Exchange. To ensure ESG compliance and effective risk management, in May 2023, Lygend established an ESG Committee chaired by the Executive Director of the company and comprising several department directors and individuals with expertise in ESG risk identification and management.

In addition to aligning our ESG goals, there are clear existing synergies that PT HPL and Lygend Resources are working toward, such as aligning to respective country green economy goals. Crucial to achieving our ESG objectives is Lygend's active engagement with our overseas counterparts. Despite a relatively short three-year project duration, PT HPL's ESG teams and processes have proven to be highly effective, and we are noticing how they are instilling customer confidence. This positive feedback from our buyers has further bolstered their trust in continuing to engage with Lygend for potential future collaborations. We believe this will be key to the success of PT HPL and Lygend Resources.

*About: HPL is a crucial subsidiary of Lygend. Lygend provides extensive support concerning the execution of engineering design, project supervision, and management, and the export of equipment and materials.*



# Business ethics and compliance

[GRI 2-27, 3-3, 205-2] [SASB EM-MM-510a.1]

PT HPL strictly prohibits any form of bribery, gratification, corruption, money laundering, and fraud. In alignment with the PT TBP’s policies and practices, we are committed to enforcing all national regulations and upholding the highest standards of integrity, morals, and ethics. All employees must comply with the Harita Nickel [Code of Ethics and Conduct](#) and [Anti-Bribery/Gratification, Corruption, and Money Laundering Policy \(Anti-Bribery Policy\)](#). This Policy extends to our suppliers and business partners, who must sign an Integrity Pact as a pledge to comply with our responsible business practices. PT TBP is also currently developing a conflict-of-interest policy, which will be introduced soon and will apply to PT HPL.

Our Ethics and Risk Committee oversees the effective implementation of these policies, ensuring that all employees are kept fully informed through regular training and communication. In December 2023, about 100 employees across Harita Nickel, including members from PT HPL, attended webinars on PT TBP’s Anti-Bribery Policy, whistleblowing procedures, and grievance mechanisms. Harita Nickel aims to roll out anti-bribery, whistleblowing, and human rights training sessions for all PT HPL employees by the end of 2024.

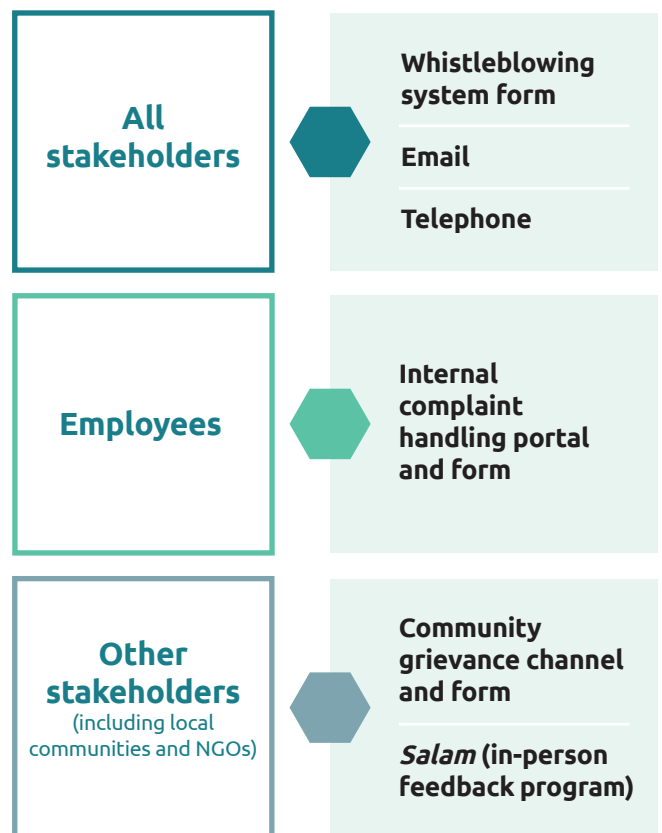
- See our [website](#) for relevant updates.
- See the [PT TBP 2023 Sustainability Report](#) for more details.

PT HPL complies with national industry regulations and maintains high operational standards in line with Harita Nickel’s Sustainability Policy and commitments. **In 2023, PT HPL met all regulatory thresholds for water, waste, and air quality, and there were no instances of non-compliance.** In the event of suspected non-compliance, we conduct a thorough investigation and take immediate remedial action to halt the activity or mitigate its repercussions.

## Whistleblowing and grievances

[GRI 2-16, 2-26, 2-27]

All PT HPL’s stakeholders have access to Harita Nickel’s [Whistleblowing Policy](#) and transparent and accountable grievance mechanisms, which ensure the confidentiality of whistleblowers and complainants. These include:



In 2023, ten PT HPL employee grievances were reported through our system. We addressed all of these cases, which were related to employee accommodation, workplace, and healthcare facilities, as well as colleague work dynamics. No supplier-related grievances were raised in this reporting year. Harita Nickel is further improving its grievance mechanism in 2024 to continuously follow a complaint’s progress until resolution and track remediation actions.

- For more information on whistleblowing and an overview of community-related grievances, see PT TBP’s [website](#) and [Sustainability Report 2023](#) (p. 62).



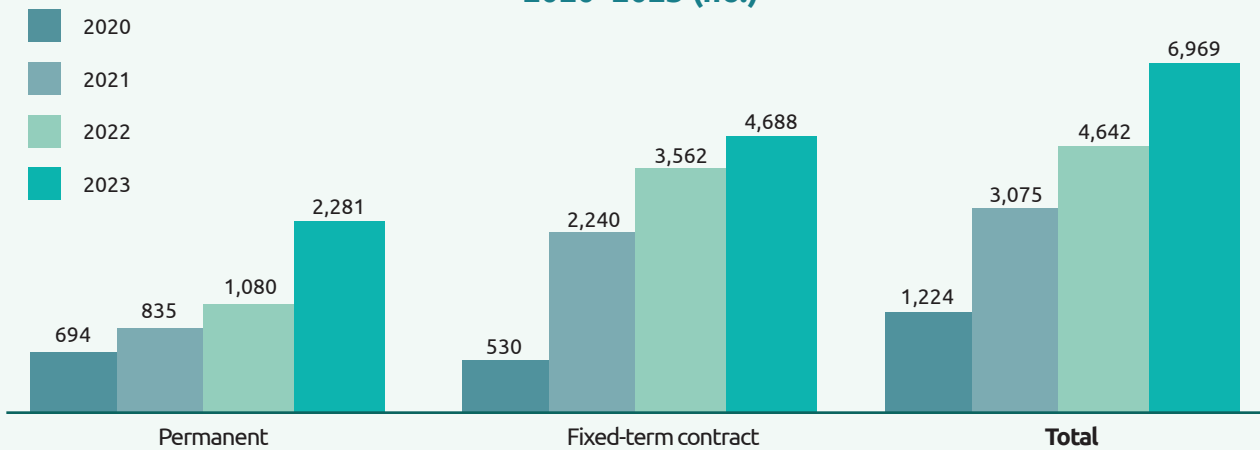
# Diversity and equal opportunity

[GRI 3-3, 405-1, 405-2, 406-1] [SASB EM-MM-000.B]

PT HPL does not tolerate any form of discrimination and upholds Harita Nickel’s policies and principles of equality and fairness as outlined in the [Code of Ethics and Conduct](#). Employees are remunerated equally regardless of gender and hired solely based on merit, qualifications, and ability. All employees receive regular training on avoiding discrimination and sexual harassment. No instances of discrimination were reported in 2023.

As of December 2023, PT HPL had 6,969 employees: 2,281 (33%) permanent and 4,688 (67%) with fixed-term contracts. Due to the manual nature of our industry, we prioritize hiring and training a young workforce, with 56% of our employees under 30.

Employee by contract type 2020–2023 (no.)

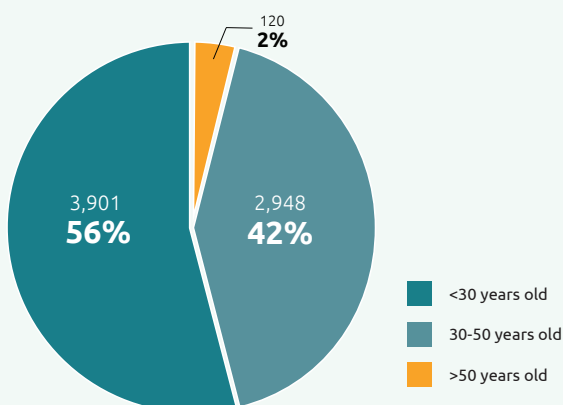


Note:

1. Permanent employees are those with an indefinite contract.
2. Fixed-term contract employees are hired on a definite or recurring contract basis, subject to renewal based on project needs.
3. 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.
4. The data for 2020–2022 fixed-term contract employees has been restated to include foreign employees based in Indonesia.

Employee by age group 2023 (no.,%)

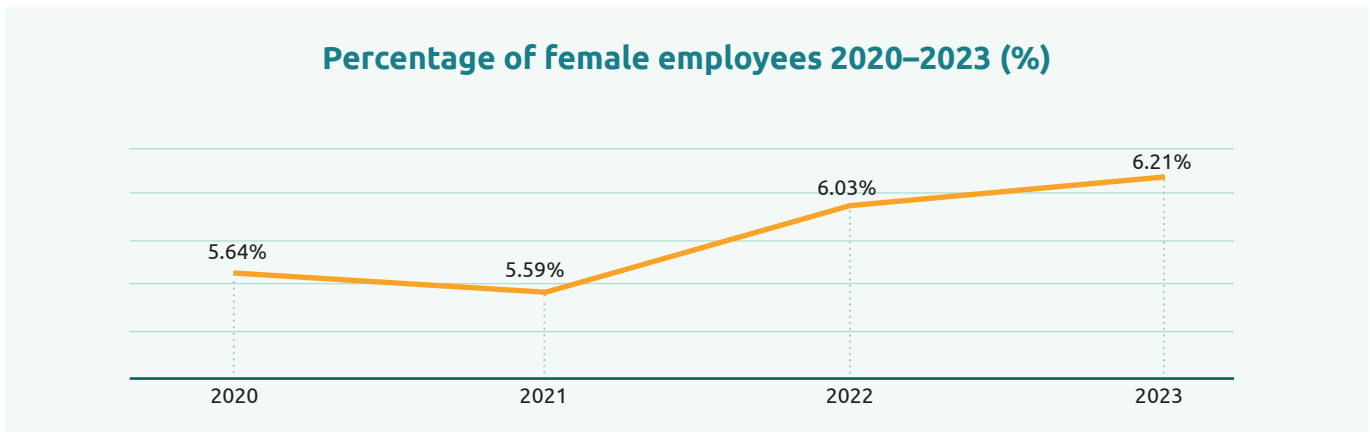
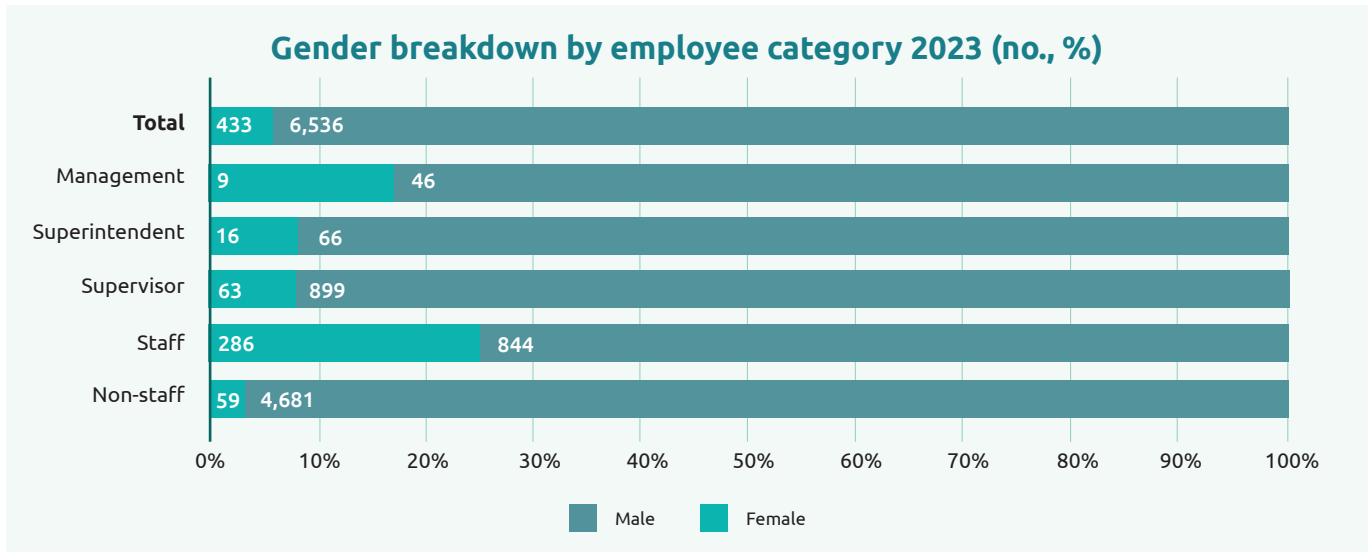
Total: 6,969



Most of PT HPL’s employees are male, and 433 (6.21%) are women, primarily in administrative and office-level positions. However, there is a higher percentage of women in executive and leadership roles at PT HPL (7% supervisory, 20% superintendency, and 17% managerial). The proportion of female employees increased from 5.64% in 2020 to 6.21% in 2023.

A Gender and Diversity working group has been formed at Harita Nickel to address gender barriers in the mining industry. Working group initiatives encompass PT HPL’s operations. For more details, see [PT TBP’s 2023 Sustainability Report](#).

**GOOD GOVERNANCE**



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 for entry level employee by gender 2023

Location	Gender	Local minimum salary (IDR/month)	Lowest basic salary (IDR/month)	Ratio between lowest basic salary compared to local minimum salary
Site (Obi Island, North Maluku)	Male	2,976,720	3,242,200	1.09
	Female	2,976,720	3,242,200	1.09

Note:

- Data was assured by KAP *Purwantono, Sungkoro & Surja* ([KAP PSS – EY] a member firm of Ernst & Young Global Limited) under the scope of PT TBP’s 2023 Sustainability Report.
- As of December 2023, there were no entry-level female employees at our head office. Male and female contractors at our head office were paid the same minimum wage as Harita’s male employees.

➤ See also [Labor rights and practices](#) for more details on employee wages.

## Economic performance

[GRI 3-3, 201-1]

All our products are exported. While our production and sales volume has increased in 2023, lower nickel prices and less favorable foreign exchange rates have resulted in a decrease in revenue and total net profit when compared to the previous year. These were USD 0.99 billion and USD 235.09 million, or around 4% and 46% less than 2022, respectively.

## Stakeholder engagement

[GRI 2-28, 2-29, 3-3]

At PT HPL, we believe in the power of constructive stakeholder dialogue and understand its importance in contributing to, and sustaining, long-term positive impacts to overcome common challenges. In 2023, Harita Nickel developed a holistic strategy towards stakeholder engagement, which includes inviting stakeholders to office and site visits, outreach to stakeholders abroad (e.g. Europe and China), and organizing discussions on the critical minerals landscape.

- See our [Stakeholder engagement table](#) for an overview of our stakeholder groups and engagement methods.

## Transparency and communication

PT HPL is committed to transparency by informing all stakeholders about the company's activities with regular reporting and public engagement. In 2023, we expanded the scope of sustainability-related training for our employees to reflect our new Sustainability Policy and governance-related procedures. We also strive to fully align with sustainability-related disclosures and have begun aligning against the IFRS Sustainability Disclosure Standards for this report, with greater alignment expected in 2024.

- See [About this report](#) for details on our standards alignment.





## Supply chain management

[GRI 2-6, 3-3, 308-1, 308-2, 414-1, 414-2]

We conduct strict supplier due diligence in accordance with Lygend and Harita Nickel's processes. We are guided by PT TBP's [Supplier or Vendor Performance Improvement and Selection Policy](#), [Code of Ethics and Conduct](#), the 2023 [Responsible Sourcing Policy](#), and [Human Rights Policy](#) to ensure all our suppliers, including vendors and contractors, meet our requirements.

All suppliers are assessed to identify and mitigate potential environmental and social risks. We engage in constructive dialogue with our suppliers and address any external concerns raised against them by way of our grievance mechanism.

### Updating supplier requirements

At the time of this report's publication, Harita Nickel including PT HPL is revising the requirements of the Integrity Pact and standard operating procedures (SOPs) to assess suppliers against ESG criteria. This aligns with PT TBP's policies as well as the OECD and IRMA Standards for Responsible Mining and Responsible Minerals Initiative guidance on supply chain due diligence. To ensure that suppliers are aware and to support them in complying with our updated requirements and sustainability commitments, we will initiate supplier training programs and aim to complete training for all raw materials suppliers by 2025.

- For more information, see the [PT TBP 2023 Sustainability Report](#).
- See also [Whistleblowing and grievances](#).

## Minimizing the risk of conflict minerals

Although we do not operate in Conflict-Affected and High-Risk Areas (CAHRA), we are mindful that we may indirectly purchase minerals or metals from such areas through our suppliers. To tackle these concerns, we have incorporated [OECD guidance](#) into our supplier assessment criteria. Our 2023 assessments confirm that we do not source from CAHRA.

### Assessing our performance against international responsible sourcing standards

In 2023, PT HPL was rigorously audited against global ESG standards for responsible sourcing, as required by our customer, a leading automotive manufacturers. The audit assessed our performance in line with OECD guideline on CAHRA, labor and working conditions, and health, safety, and environment indicators. The process included engagement with our Obi Island stakeholders and led to the development of action plans for further alignment with international standards. As we work toward implementation of these initiatives, we will regularly monitor and provide progress updates to our customers. We welcome collaboration with customers and other stakeholders to further enhance our ESG practices.

# CLIMATE CHANGE



According to recent forecasts, the global demand for nickel and cobalt is expected to increase twentyfold by 2040 compared to 2020 levels.<sup>5</sup> This is primarily stimulated by the need for nickel-based products and batteries in the transport and power storage sectors.<sup>6</sup>

As PT HPL increases production to meet demand, we continue to uphold environmentally responsible production practices that align with Harita Nickel's Sustainability Policy and Biodiversity Policy. Before embarking on any new developments, we vigorously

ensure that we comply with government regulations, conduct environmental impact analyses, and obtain environmental permits.

Our Environmental Management Systems are ISO 14001-2015 certified. These systems help to ensure the effective implementation of our initiatives and mitigate any potential adverse environmental impacts from our operations.



## Pioneer of HPAL in Indonesia

PT HPL was the first company in Indonesia to adopt high-pressure acid leaching (HPAL) technology. This technology enables us to process limonite as raw material and **increase yields by up to 75% per hectare.**<sup>7</sup>

We also achieved nameplate capacity within a year of operation, thanks to our rapid construction of necessary facilities and strategic

proximity to the Group's mining operations. In addition, our third-generation HPAL technology is more efficient than other previous-generation systems currently on the market. **Together, these factors contribute to lower energy and emissions intensity, and improved production efficiency.**

<sup>5</sup> International Energy Agency. (2022, March). [The role of critical minerals in clean energy transitions.](#)

<sup>6</sup> International Energy Agency. (2023, July). [Critical minerals market review 2023.](#)

<sup>7</sup> Limonite has a lower nickel content and was formerly classified as valueless "overburden". It sits above the saprolite layer and could not be processed prior to HPAL technology.

## Climate action

[GRI 3-3, 201-2]

As the world strives to meet the Paris Agreement’s objective of limiting global temperatures to 1.5°C above preindustrial levels, the demand for critical minerals is set to surge in tandem with an escalating need for clean energy solutions. To meet this growing demand, we recognize the importance of ensuring a sustainable supply and support Indonesia’s goal to reach net zero emissions by 2060.

### Aligning with PT TBP’s decarbonization efforts

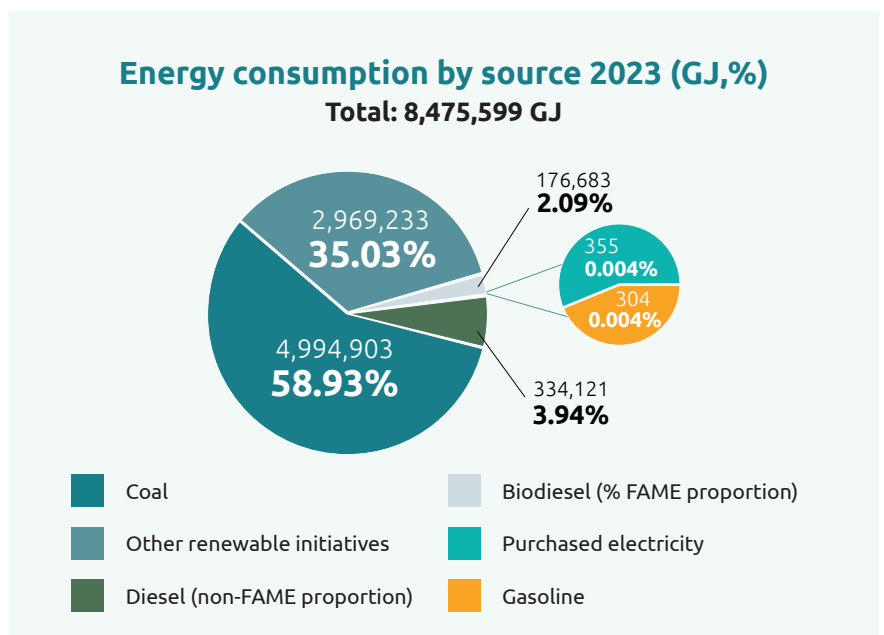
In 2023, Harita Nickel embarked on a research project with an international development agency to develop decarbonization strategies and to set relevant emissions reduction and renewable energy targets. PT TBP also conducted a qualitative Climate Change Risk Assessment (CCRA) encompassing all its entities, including PT HPL.

- Refer to the [PT TBP 2023 Sustainability Report](#) for more information.

## Energy use

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

Because of our geographically isolated location with no access to grid electricity, coal is our primary power source and accounts for over 58% of our total energy consumption. Our power plants convert coal into electricity for our processing plants. A negligible proportion of our energy comes from gasoline for vehicles and generators, purchased electricity for lighting and air-conditioning in our Ternate offices, workers’ living quarters, other on-site operations, and liquified petroleum gas (LPG) for employee domestic purposes.



In 2023, our total energy consumption was more than 8.47 million gigajoules (GJ) – almost double our 2022 figure due to increased production and our new nickel and cobalt sulfate operations. However, our energy intensity decreased from 35.61 GJ per ton of MHP processed (GJ/t) in 2022 to 25.68 GJ/t in 2023, thanks to our initiatives to improve energy efficiency, including recovering waste heat and adopting higher concentration of FAME in biodiesel and solar power.

### *Our proprietary waste heat recovery system*

PT HPL operates a waste heat recovery system at our acid plant, which captures and repurposes heat generated from operational processes as a source of energy. The system was established in 2021 and channels energy to other production methods across other facilities/in other PT HPL processes. This significantly reduces the demand for energy generated by coal combustion, thereby lessening fossil fuel consumption and greenhouse gas emissions. **In 2023, the system recovered 2,870,080 gigajoules (GJ) of energy and contributed 73% (307,988 tCO<sub>2</sub>e) of PT TBP's total avoided emissions.**

### *Reducing dependence on fossil fuel*

Although current renewable energy technologies are not yet efficient enough for all our operational energy requirements, **we have increased our sustainable energy mix by almost 2,500% to 3.14 million GJ, making up almost 39% of our total energy consumption in 2023.** This comprises biodiesel and solar energy captured from photovoltaics (PVs). In 2023, 9 kWp solar PVs were installed to power streetlights throughout the PT HPL complex. At our Obi Island industrial area, we are planning to set up more solar power generation facilities to further enhance our renewable energy mix, with a 300 MWp solar panel facility planned for commissioning by the end of 2025. We have also adopted electric heavy goods vehicles (HGV) at our sulfate plant to reduce our reliance on fossil fuel.

- For more information on Harita Nickel group-wide sustainable energy programs, see the [PT TBP 2023 Sustainability Report](#).





## GHG emissions and air quality

[GRI 3-3, 305-1, 305-2, 305-3,305-7] [SASB EM-MM-110a.1, EM-MM-120a.1]

PT HPL monitors and evaluates GHG emissions according to Harita Nickel's practices and in compliance with regulations, following the GHG Protocol and ISO 14064 standards for emissions inventory. We completed a full GHG emissions inventory in 2022 and in 2023 expanded our Scope 1 reporting to include calcium carbonate (CaCO<sub>3</sub> or limestone) emissions.

In 2023, our total GHG emissions were 1,861,116 tons of carbon dioxide equivalent (t CO<sub>2</sub>e) – an increase of more than 79% compared to 2022 and in line with the expansion of our production and operations, as well as the inclusion of CaCO<sub>3</sub> emissions.<sup>8</sup> Of our total emissions, 53% or 994,117 t CO<sub>2</sub>e were from Scope 3 emissions and 47% or 866,913 t CO<sub>2</sub>e from Scope 1 emissions, while Scope 2 emissions remained negligible. Our combined Scope 1 and Scope 2 emission intensity was 13.36 t CO<sub>2</sub>e per ton of nickel produced.

### GHG emissions by Scope 2021–2023 (t CO<sub>2</sub>e)

Sources		2021	2022	2023
Scope 1	Emissions from sources owned/controlled, i.e., from stationary combustion, mobile combustion, and fugitive sources	200,829	679,608	866,913
Scope 2	Emissions from sources purchased, i.e., from location-based purchased electricity	Not assessed	114	86
<b>Sub-total</b>		<b>200,829</b>	<b>679,722</b>	<b>866,999</b>
Scope 3	Emissions from indirect sources within the value chain, i.e., upstream and downstream transport, employee commuting, business travel, purchased goods and services, and capital goods	Not assessed	358,486	994,117
<b>Total</b>		<b>200,829</b>	<b>1,038,208</b>	<b>1,861,116</b>

#### Notes:

1. Our 2022 data on Scope 1 emissions has been restated to include CaCO<sub>3</sub> emissions.
2. Our 2021 power plant data was externally assured by PT. Intertek Utama Services (Intertek), while 2022 data for our entire operations was externally assured by Bureau Veritas.
3. Our 2023 data was externally assured by Intertek under the scope of PT TBP's 2023 sustainability report.

<sup>8</sup> 2022 absolute emissions and emission intensity data have been restated to include CaCO<sub>3</sub> emissions.

## CLIMATE CHANGE

### Non-GHG air emissions

Production processes and coal combustion at power plants can result in dust and other air emissions. We have implemented stringent measures to ensure that our air emissions adhere to the latest Indonesian government regulations for air pollution control.<sup>9</sup> These include:



Installing boilers with low nitrogen oxide emission



Installing desulfurization equipment to reduce sulfur oxide emission



Installing electrostatic precipitators to reduce emissions of particulate matter



Ensuring vehicles drive slowly and using conveyor belts to transport materials such as coal; installing a coal dome to mitigate dust pollution



Installing dust control systems, such as sprinklers, ventilators, collectors, and filters



Planting trees for air purification in our operational areas

We engage independent laboratories to measure our ambient air emissions and submit quarterly and semesterly reports to the Indonesian government. **2023 monitoring revealed that our air emissions stayed within regulatory limits.**

<sup>9</sup> These cover Minister of Environment and Forestry Regulation No. 11 of 2021 Appendix 1 for our stationary generator; Minister of Environment and Forestry Regulation No.15 of 2019 Appendix I Point A for our power plant; and Minister of Environment and Forestry Regulation No.4 of 2014 Appendix V for our acid plant.

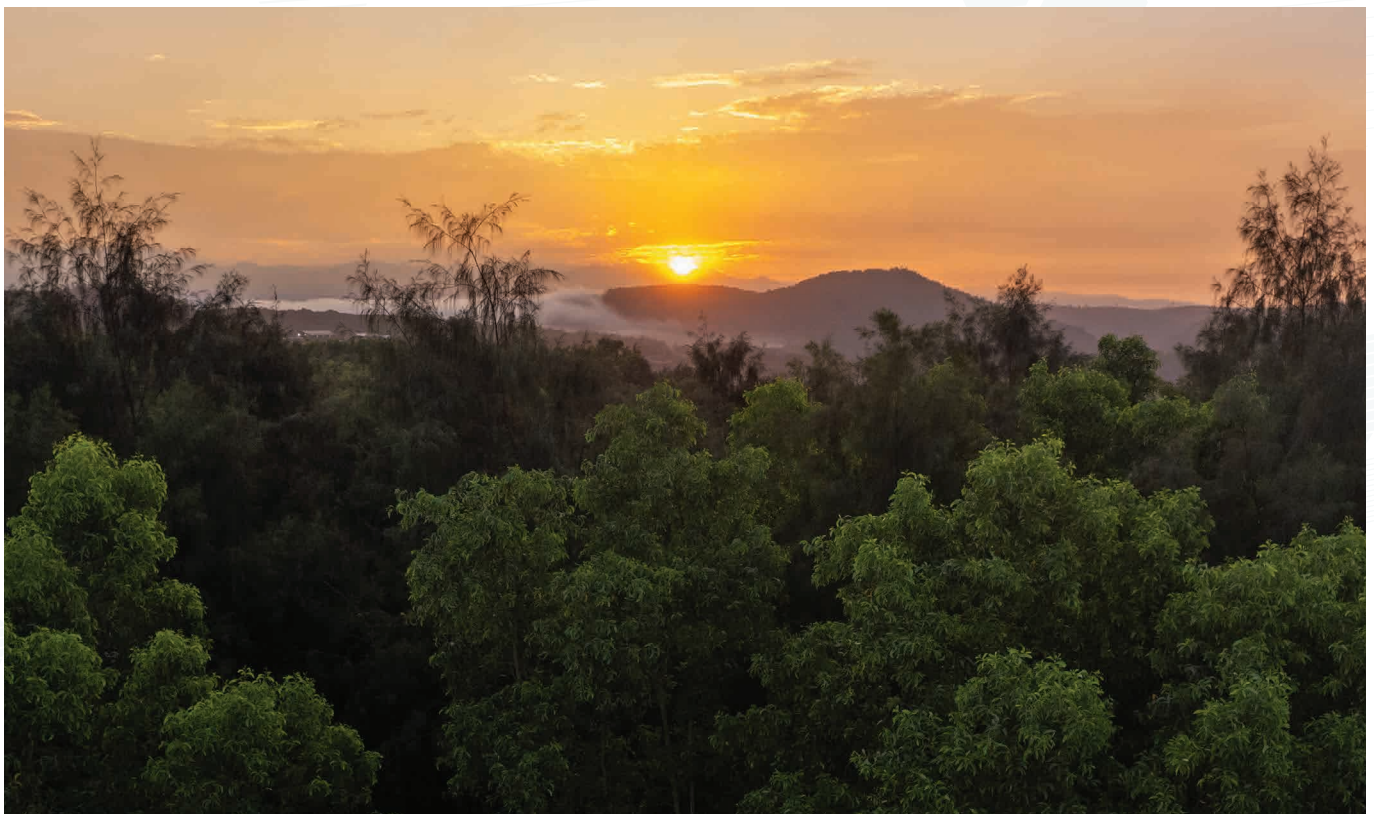
## Non-GHG air emissions 2023 (kg)

Emission type	Source	2023
Nitrogen oxide (NO <sub>x</sub> )	Power plant	1,344.97
	Acid plant	128.89
Sulfur oxides (SO <sub>2</sub> )	Power plant	2,536.87
	Acid plant	192.18
Particulates	Power plant	284.62
	Acid plant	117.84

### *Continuous emission monitoring system*

In August 2023, a new continuous emission monitoring system (CEMS) was brought online across the wider Harita Nickel operations, including PT HPL, to address the limitations of periodic monitoring. The CEMS is regulated by the Ministry of Environment and Forestry and measures key air quality parameters through devices connected to

our acid plant and power plant chimneys. At the time of this report’s publication, the CEMS is up and running. It transmits data in real-time directly to the Ministry of Environment and Forestry’s monitoring system, *Sistem Informasi Pemantauan Emisi Industri secara terus menerus* (SISPEK).

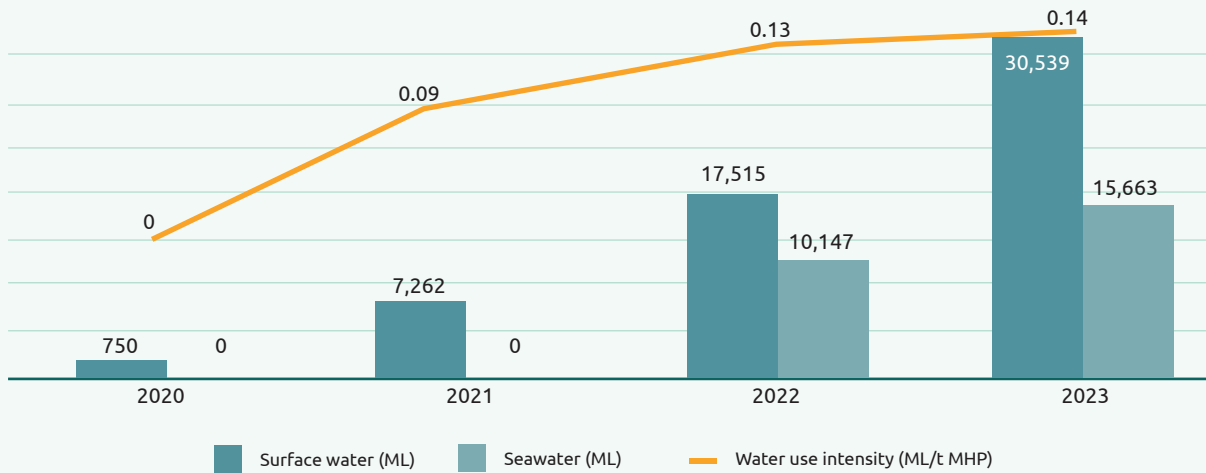


# Water management

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

During our first year of operation, PT HPL solely relied on water from Lake Karo. However, in 2022, we began using seawater as a coagulation agent in accordance with government permits. In 2023, we withdrew 46,202 megaliters (ML) of water, about 66% of which was surface water from Lake Karo, with the remaining coming from the sea. In 2023, our water use intensity per ton of MHP processed (ML/t MHP) was 0.14. The volume of water withdrawn and our water use intensity have increased each year as we continue to expand our operations and reach full capacity.

**Water withdrawal by source and water use intensity 2020–2023**



**Note:**

1. Data for water withdrawal and water use intensity does not include reused water.
2. We hold government permits to withdraw water from the lake and submit monthly payments based on the volume of water withdrawn.
3. Surface water is used for our operational processes and office and domestic use.

We understand that HPAL technology is comparatively water-intensive, more so than mining activities and RKEF (Rotary Kiln Electric Furnace) processes. Therefore, we are committed to responsible water management. To mitigate potential environmental impacts, we strive to reduce our reliance on the lake as a water source while exploring ways to reduce our water use intensity. In 2023, we redirected 990 ML of processed water from our acid plant back to our MHP production lines for reuse. We continue to raise awareness with internal communication to our employees on how to reduce water usage in our offices, employee quarters, and near our operations.

### *Adaptive water management plan*

Harita Nickel is currently developing an Integrated Water Management Plan to create near closed-loop systems for water use across all new processing operations. PT HPL will implement our water strategies in accordance with the plan and will share more details in future reporting.



## Safeguarding water quality and availability

[SASB EM-MM-140a.2]



We follow specific standard operating procedures (SOPs), including on wastewater and runoff management, to ensure clean and safe water for our communities and the environment. We are continually exploring innovative methods to recycle and reuse water. For instance, we utilize recycled water at our power plant cooling towers to provide air conditioning for our facilities.

To safeguard water availability and minimize our freshwater usage, we use it twice prior treated and meet threshold limit before releasing back to environment.

We operate three wastewater treatment plants (WWTP) that treat wastewater and runoff from our operations. Runoff from our dry stack tailings facility (DSTF), also known as leachate, is channeled to leachate collection ponds connected to WWTP Discharge Point 1 for further treatment. After treatment, all wastewater is directed to sedimentation ponds through appropriate drainage systems.



We conduct real-time monitoring of water usage and wastewater quality, which is essential for optimizing water use and protecting the environment from pollution while ensuring compliance with regulations.

### Wastewater monitoring with SPARING

In 2023, the SPARING wastewater monitoring system was installed throughout Harita Nickel’s operations to capture and report real-time water quality data more efficiently. The resource comprises an electronic analyzer, data logger, and online server, which enables the real-time monitoring of indicators such as TSS, pH levels, and flow rates.

Independent, accredited laboratories regularly monitor our water discharge points and natural water sources for quality parameters, such as hexavalent chromium (Cr<sup>6+</sup>), total suspended solids (TSS), and nickel and cobalt levels. Ferrous sulfate (FeSO<sub>4</sub>) treatment is applied as necessary to ensure water quality meet threshold limit prior to discharge and in compliance with government regulations. **In 2023, there were no instances of our water quality parameters exceeding regulatory levels.**

## CLIMATE CHANGE

PT HPL also implements other measures to maintain water safety and quality, including:



➤ Refer to [PT TBP's 2023 Sustainability Report](#) (p. 86) for information on water management, as well as marine protection and Group-wide conservation programs.

➤ See also PT TBP's [Response to a BBC Inquiry](#) and [Response to the Washington Post article](#).

➤ See [Appendices](#) for details on the regulatory limits for water discharge quality parameters.

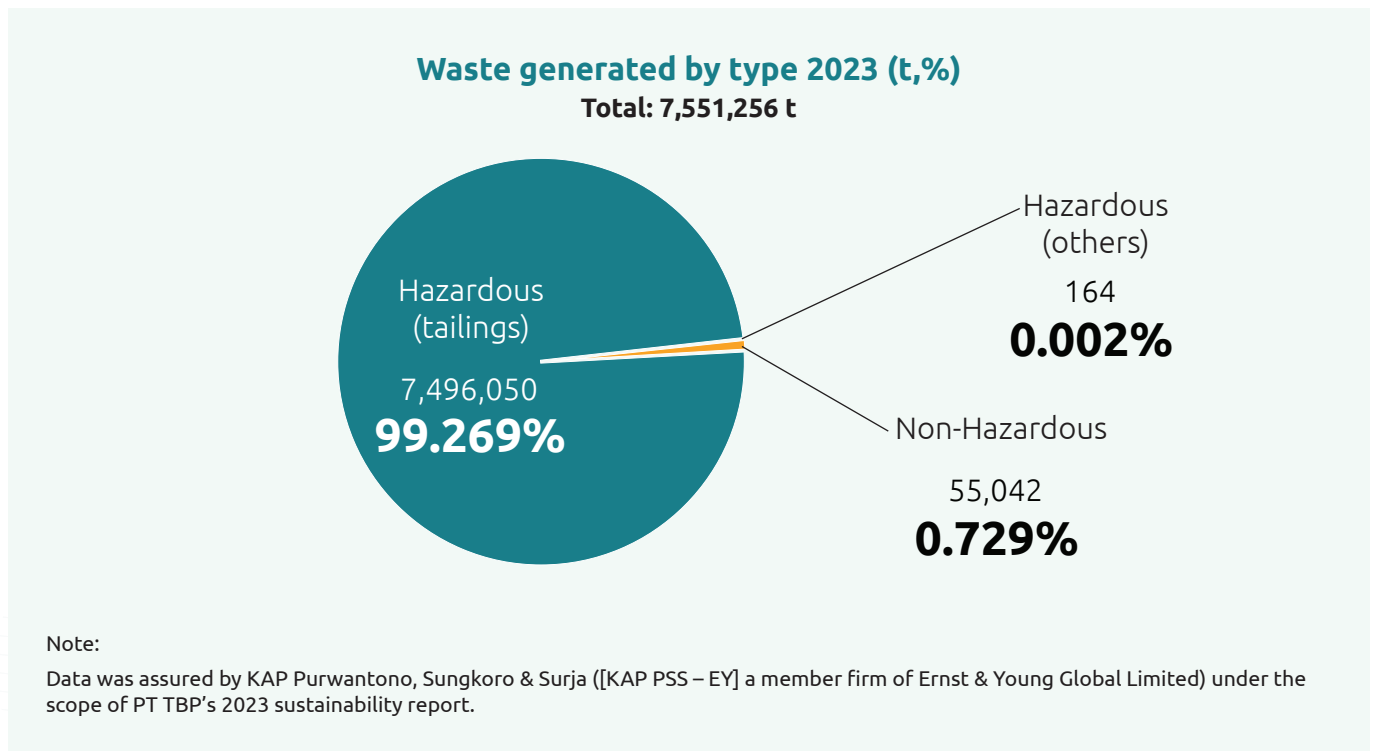
# Tailings and waste management

[GRI 3-3, 306-1, 306-2, 306-3] [SASB EM-MM-150a.5, EM-MM-150a.7, EM-MM-540a.2]



PT HPL handles all operational waste responsibly, aligning with the Group’s practices and complying with government regulations. All waste is classified as hazardous or non-hazardous and managed separately according to standard operating procedures (SOPs).

In 2023, we generated 7.55 million tons of waste, 99% of which was tailings from our HPAL process. Tailings are classified as hazardous per government regulations and strictly managed according to SLO (*Surat Layak Operasional*/ Operational Feasibility Certificate) and standard operating procedures (SOPs). Other hazardous waste makes up a negligible amount and is managed and properly disposed and treated by subcontracted, licensed third-party service providers.<sup>10</sup>



The remaining 1% of our total generated waste is non-hazardous, and consists of construction waste, fly ash bottom ash (FABA), as well as office and domestic waste. FABA is reused for backfilling at our DSTF, and other non-hazardous waste is sent to our newly established integrated waste processing facility (*Tempat Pengolahan Sampah Terpadu* [TPST]).








<sup>10</sup> These include lubricant, grease, chemicals, and medical waste from our clinics, laboratories, and other facilities.

## Responsible tailings management

Our dry tailings are tested and confirmed by accredited laboratories to be nonexplosive, nonflammable, nonreactive, noncorrosive, and nontoxic, per accepted LC50 levels and TCLP toxicity test (see details of test results [online](#)).

Nevertheless, PT HPL takes tailings management and compliance with regulations very seriously.<sup>11</sup>

**In May 2023, Harita Nickel developed an SOP for handling dry tailings.** It entails several essential steps such as:

 <p><b>Transporting dry tailings</b> using a conveyor belt, then evenly distributing tailings for stacking across the designated area, ensuring slope stability</p>	 <p><b>Creating a closed-loop system</b> by ensuring residual liquid from the filter press is captured and reused at the HPAL facility</p>	
 <p><b>Building pipes into the dry tailings storage facility</b> to enable drainage of rainwater or accidental seepage</p>	 <p><b>Capturing leakage</b> at the filter press facility in the event of any leakages, and sending it to leachate ponds</p>	 <p><b>Channeling runoff water</b> to our leachate collection and treatment ponds</p>
 <p><b>Construction of a buttress</b> to stabilize pond soil flow</p>	 <p><b>Regularly testing water quality at designated points</b> to ensure non-hazardous levels. The water is treated to ensure safety in the unlikely event that thresholds are exceeded</p>	

PT HPL has researched different tailings management approaches for our operations and identified dry stacking method to be implemented. During this procedure, tailings is neutralized, filtered, and compacted into dry silty clay material that are then stacked and stored at our 195-hectare DSTF. **We do not practice deep sea dumping when disposing tailings, and have**

**never disposed of tailings into waterways or any area outside of the currently permitted DSTF.** Our DSTF is in a former mining area with a total capacity of 25.8 million cubic meters (m<sup>3</sup>), or 57.2 tons of dry tailings. As of December 2023, 5.7 million tons of tailings were stored at the DSTF.

➤ See [Base data](#) for more information on our DSTF facilities.

➤ Also see [PT TBP’s 2023 Sustainability Report](#) (p. 98) for information on the TPST and domestic waste management.

<sup>11</sup> All relevant environmental permits for managing dry tailings have been obtained from the Ministry of Environment and Forestry, including the Technical Approval (Pertek) No. S.763/PSL83/PLB3/PLB.3/12/2022 specifying the provisions and responsibilities for hazardous waste management and stockpiling activities.



## Emergency prevention and handling

[GRI 3-3] [SASB EM-MM-540a.3]

In case of emergencies, PT HPL is guided by the Group’s Emergency Response Plan (ERP). The ERP aligns with national legislation and global guidelines set out by the World Bank and the United Nations Environment Programme (UNEP) Awareness and Preparedness for Emergencies at Local Level (APELL) for Mining. It is updated at least every 24 months and considers all probable emergency scenarios that could affect Harita Nickel’s operations and our surrounding communities.<sup>12</sup> We have established Flood Emergency Management Procedures and have a robust drainage system and rainwater collection facilities to mitigate flooding risks from heavy storms.

### Managing potential emergencies at our DSTF

Our DSTF was constructed after obtaining the necessary government permits and undergoing evaluation by independent experts.<sup>13</sup> We have also taken several measures to ensure the physical security and stability of our DSTF area and mitigate safety risks in the event of potential emergencies or natural disasters.<sup>14</sup> These include:

**01**

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

**02**

Adopting buttressing techniques to reinforce vulnerable terrain and bolster structural integrity

**03**

Ensuring proper tailings pile management, i.e., managing slope and distribution for optimal stability

**04**

Installing proper drainage systems to minimize the impact of heavy rainfall or potential flooding events

➤ Refer to [PT TBP’s 2023 Sustainability Report](#) (p. 61) for more details.

<sup>12</sup> These include natural catastrophes like earthquakes, landslides, flooding, and other crises, such as fires, gas explosions, hazardous spills, or leaks.

<sup>13</sup> Standards include those from the Australian National Committee on Large Dams (ANCOLD), the International Committee on Large Dams (ICOLD), and the Global Industry Standard on Tailings Management (GISTM).

<sup>14</sup> This is crucial, as Harita Nickel operates in a region with high rainfall and significant seismic activity.

# HUMAN RIGHTS



We respect and uphold the rights of everyone associated with our operations – from our employees to the local communities and suppliers we work with.

Our commitments are integrated into our policies and practices throughout the company and are in line with Harita Nickel's [Human Rights Policy](#), published in February 2023.

## Expanding our efforts to safeguard human rights

Our Human Rights Policy outlines our commitment to upholding human rights in line with international standards and principles. These include the Universal Declaration of Human Rights (UDHR), the Declaration on Principles and Fundamental Rights at Work by the International Labor Organization (ILO), and the United Nations Guiding Principles on Business and Human Rights (UNGPR).

In 2023, a [human rights due diligence](#) assessment was conducted for Harita Nickel and all of its entities including PT HPL with the support of an independent human right expert organization – the Foundation for International Human Rights Reporting Standards (FIHRRST) – to further improve our human rights practices and inform the development of the Group's new Human Rights Policy.

➤ See [PT TBP's 2023 Sustainability Report](#) for an overview of the 2023 Human Rights Due Diligence assessment.

➤ See also [Supply chain management](#).

# Labor rights and practices

[GRI 2-7, 2-8, 3-3, 401-1]

We are committed to upholding all our workers’ rights and providing stable employment conditions, according to the standards as outlined in our Human Resources Management Policy and standard operating procedures for recruitment and promotion. In 2023, we hired 2,456 new employees.

## New hires 2023 (no. [%])

Total: 2,456

		No.	%
By gender	Men	2,304	93.81%
	Women	152	6.19%
By age group	< 30 years old	1,473	59.98%
	30–50 years old	979	39.86%
	> 50 years old	4	0.16%
Indonesians vs. foreigners	Indonesians from North Maluku	552	22.48%
	Indonesians from other areas	1,510	61.48%
	Foreigners	394	16.04%

➤ See also [Diversity and equal opportunity](#), and [Prioritizing the local economy](#).

➤ See [Base data](#) for information on employee turnover.

## Wages and benefits

[GRI 2-30, 202-1, 401-2, 401-3, 402-1] [SASB EM-MM-310a.1]

We provide fair and attractive compensation and remuneration packages that surpass government requirements. Our policy and practices are in line with that of Harita Nickel, ensuring:

- Payment above minimum wage, regardless of contract (including for contractors and outsourced labor).
- Equal pay for equal work, regardless of gender.
- Overtime pay and allowances for operational employees.

For operational employees, entry-level wages exceed the Indonesian provincial monthly minimum wage for North Maluku by about 9%; entry-level employees at our Jakarta head office are paid above the minimum wage. Operational employees receive greater compensation, primarily allowances for food, travel, language classes, and other allowances for some skilled workers.

➤ See also [Diversity and equal opportunity](#).

## HUMAN RIGHTS

We adopt PT TBP's approach to respecting employee rights and providing employees with comprehensive benefits. We strictly adhere to national laws<sup>15</sup> regarding minimum notice periods, working hours, overtime, rest days, parental leave, and freedom of association whilst continuing to maintain regular dialogue with employees following customary practices.



Our head office working hours are **eight hours per day** from Monday through Friday, and we implement a rest day for all operational employees every two weeks. Working hours on site are in line with the Indonesian regulations.



All employees have access, without fear of reprisal or dismissal, to our open and transparent whistleblowing and grievances mechanism. We **provide training** to ensure employees fully understand the process and post notices on bulletin boards throughout our sites.



In 2023, **38 out of 2,222** eligible employees took parental leave.



We have established a **bipartite cooperative institution**. Although no unions have been formed, should they do so, we will respect and facilitate all union needs and rights.

➤ Refer to [PT TBP's 2023 Sustainability Report](#) (p. 127– 129) for more details.

➤ See also [Whistleblowing and grievances](#).

## No child and forced labor

[GRI 408-1, 409-1]

We comply with Indonesian government laws and regulations and ILO indicators on preventing child labor and forced labor<sup>16</sup>. All our employees are employed directly by us and not through recruitment agencies, and we cover all fees related to the hiring process, including medical tests and transportation.

➤ See [PT TBP's 2023 Sustainability Report](#) (p. 140) for our practices to prevent child and forced labor.

## Training and development

[GRI 3-3, 404-1, 404-2]

PT HPL takes proactive steps to anticipate and develop our workforce talent. We adopt Harita Nickel's approach centered on job function needs analysis and offer all employees a range of informal and formal training, education, and development opportunities throughout the year. Each program is evaluated for effectiveness upon completion and adjusted if improvements are required. In 2023, employees received an average of 13.2 hours of training.

➤ See the [PT TBP's 2023 Sustainability Report](#) (p. 137–138) for an overview of our employee training programs.

<sup>15</sup> These are Law No. 2 of 2022 on Job Creation (Regulation) and Government Regulation No. 35 of 2021.

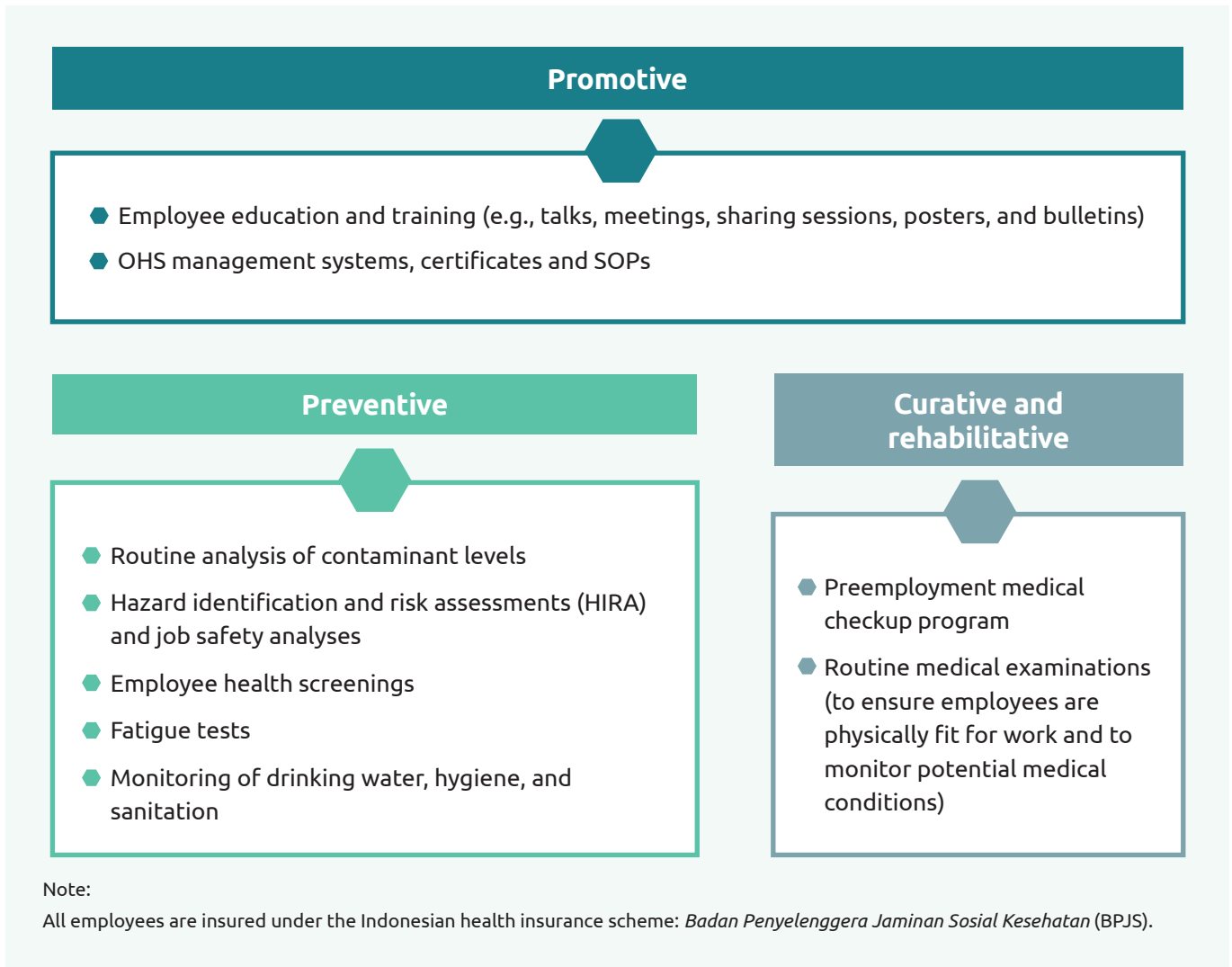
<sup>16</sup> These include Convention No. 29 on Forced Labor (1930) and its Protocol (2014), Convention No. 105 on the Abolition of Forced Labor (1957), and Convention No. 138 on the Minimum Age For Employment (1973) and the Indonesian regulations include Law No. 13 of 2000 on Labor, Law No. 23 of 2002 and its amendment Law No. 35 of 2014 on Child Protection, as well as the Ministry of Manpower and Transmigration (MoMTR) Decree No. Kep. 235/Men/2003 on types of work that endanger the health, safety, or morals of children.



# Occupational health and safety

[GRI 3-3, 403-1, 403-2, 403-3, 403-5, 403-8, 403-9] [SASB EM-MM-320a.1]

Guided by our Occupational Safety and Health, Environment, Security, and Social Relations Policy, we go beyond typical procedures to instill a culture of safety and health throughout our operations. We have implemented occupational health and industrial hygiene (OHII) programs which encompass three areas: Promotive, Preventive, and Curative and rehabilitative.



We adopt Occupational Health and Safety (OHS) management systems in line with national regulations. **In 2023, our OHS management systems were successfully certified for compliance with the Indonesian government standard, *Sistem Manajemen Keselamatan dan Kesehatan Kerja (SMK3)*, and the ISO 45001:2018 international standard.**

All employees and contractors are provided with the necessary personal protective equipment (PPE) to perform their roles safely and are required to undergo regular OHS training, including on heavy equipment operations and general safety.

## HUMAN RIGHTS

### Accident reporting

We strive to reduce the frequency of accidents and contribute to the Group's target to reduce the total recordable injury frequency rate (TRIFR) for both employees and contractors by 5% against the 2022 baseline. In 2023, PT HPL achieved 25,971,948 man hours worked. There have been no fatalities at PT HPL since the start of our operations.

#### Employee and contractor incidents 2021–2023 (no.)

	First aid cases (minor injuries)			Cases requiring further medical attention			TFIFR			Severity rate		
	2021	2022	2023	2021	2022	2023	2021	2022	2023	2021	2022	2023
Employees	77	133	151	51	55	61	4.83	3.01	3.6	-	1	4.55
Contractors	80	133	59	88	76	90	8.24	5.19	9.76	-	4.54	-
<b>Total</b>	<b>157</b>	<b>266</b>	<b>210</b>	<b>139</b>	<b>131</b>	<b>151</b>	<b>17.66</b>	<b>5.89</b>	<b>5.77</b>	<b>-</b>	<b>3.46</b>	<b>2.96</b>

Notes:

1. First aid cases are minor injuries which are easily treated at our first aid stations. Such incidents may include eye irritation from chemical exposure, minor cuts, and discomfort from slip-and-fall incidents.
2. The TFIFR for employees covers all PT HPL permanent and fixed-term employees, while the TFIFR for contractors covers all third-party contractors.
3. Total recordable injuries and TRIFR data for employees in 2021 are restated.

The TRIFR for PT HPL employees and third-party contractors combined was 5.77, and the severity rate was 2.94 days lost per million hours worked. While TRIFR rates improved in 2022, we saw higher rates in 2023: by 19% for employees and by 88% for third-party contractors working at our site during the peak of our construction period. We take this very seriously and are currently taking measures to intensify our collaboration on OHS matters with all third-party contractors. We aim to reduce TRIFR rates across the organization for employees and contractors, with a target to reduce both rates by 5% against our 2022 baseline by 2025. We also maintain records of employees' disease or illness rates to assess their overall health and provide necessary support.

In addition to regular equipment and facility inspections, in 2023, PT HPL's OHS team also conducted the first cycle of a Hazard Operability Study (HAZOPS).<sup>17</sup>

<sup>17</sup> HAZOP methodology involves a systematic team-based Process Hazards Analysis (PHA), which can be used to effectively identify and analyze the risks of potentially hazardous process operations.

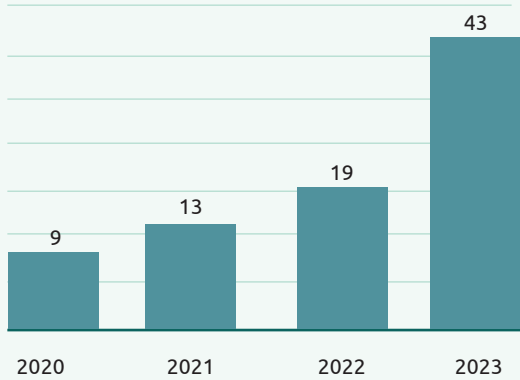
# Prioritizing the local economy

[GRI 3-3, 203-2, 204-1]

We recognize our role in supporting the local economy and, since the beginning of our operations, have consistently prioritized purchasing from local suppliers and hiring Indonesians. In 2023, our total procurement spending on Indonesian suppliers was IDR 4,508,597 billion, with IDR 3,040 billion spent on North Maluku supplies. Our North Maluku supplier base has increased from 9 in 2020 to 43 in 2023.

Of our total operational workforce, 5,992 (86%) are Indonesian employees, while the remaining 977 (14%) are Indonesia-based foreign national HPAL employees.<sup>18</sup> Of our Indonesian employees, 2,251 (38%) are from North Maluku, while the remainder come from other provinces throughout Indonesia. In addition, among all new hires, 84% were Indonesians, of which 27% were locals from North Maluku.

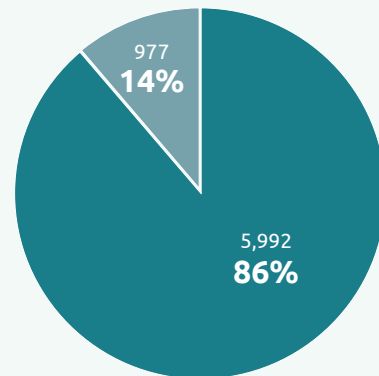
Local suppliers 2020–2023 (no.)



Note: Local refers to North Maluku.

Indonesians vs. foreign employees 2023 (no.,%)

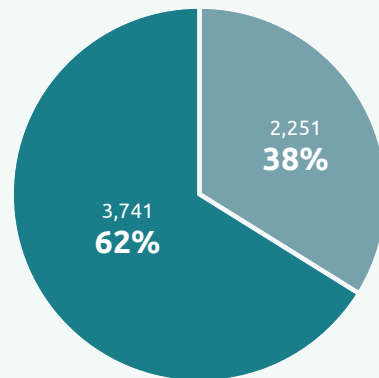
Total: 6,969



■ Indonesian employees ■ Foreign employees

Indonesians employed by region 2023 (no.,%)

Total: 5,992



■ From other Indonesian regions (non-local) ■ North Maluku (local)

Note: Local refers to North Maluku.



<sup>18</sup> Since most of our smelter and refinery technology comes from overseas, foreign employees are typically hired as supervisors for their experience and to manage our HPAL facility.

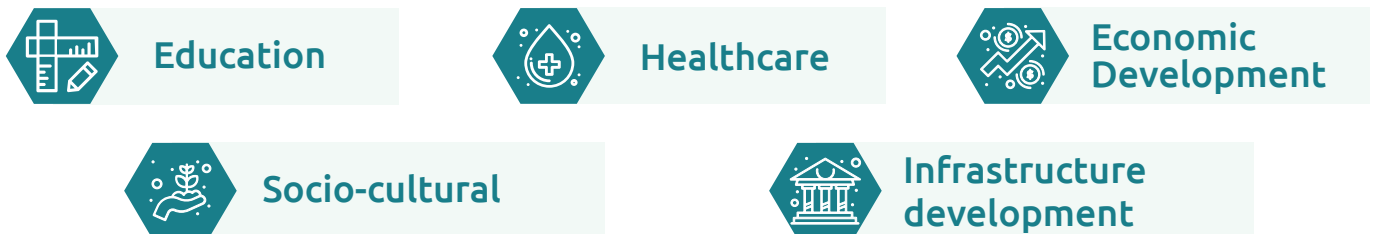
HUMAN RIGHTS

# Surrounding community

[GRI 3-3, 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]



Recognizing that our success is closely intertwined with the well-being of the local community on Obi Island, we aim to uphold their rights and support their economic and social growth. All business units under Harita Nickel, including PT HPL, share the costs and contribute to Group-level CSR programs, which fall under five main pillars:



In 2023, 85% of Harita Nickel’s total CSR budget was allocated toward 49 programs across the five pillars. The remaining funds were allocated for other activities, including the greening of operations and the construction of the new integrated waste management facility. Harita Nickel has received nine company awards and four individual awards in recognition of its CSR programs for the community in Kawasi and achieved a Community Satisfaction Index score of 83.36 – this falls within the “good” category for community support, as defined by the Indonesian government.<sup>19</sup>

<sup>19</sup> The Community Satisfaction Index (IKM) measures the community’s satisfaction with development programs. It is based on quantitative and qualitative data collected from people involved in these initiatives. The calculation follows guidelines outlined in Government Regulation number PAN-RB No. 14 of 2017 regarding public services.



## HUMAN RIGHTS

Some of our 2023 activities included:



### Education

Conducted educational activities for 150 children and teachers – focused on learning methods and the natural environment



### Economic Development

Collaborated with the local district government to farm soybeans on 4 hectares and yielding 2.94 tons per hectare – benefiting local farmers



### Healthcare

Offered free health checkups and treatment services in one village – benefiting around 80 patients with the help of 4 doctors and 14 medical staff



Commemorated World AIDS Day with a talk and provided 70 boxes (1,750 pieces) of HIV and syphilis-testing reagents to 115 participants



Organized a workshop for early detection of stunting, with support from the local government – provided anthropometric kits to 57 participants



Organized activities in conjunction with the 59th National Health Day – almost 700 individuals participated in exercise programs and benefited from free medical treatment, food, and HIV rapid testing kits



## HUMAN RIGHTS



### Socio-cultural

Distributed over 1,000 bags of food to residents of two villages, prioritizing the widowed and elderly



Distributed over 900 Eid Al-Fitr gifts across seven villages, prioritizing the underprivileged



Organized a Ramadan festival with 700 participants and donated to over 500 orphans in eight villages



Organized the annual *Ngibi* art performance to preserve local culture, featuring *Cungka* dance and *Silat* competitions with nine elementary school and four high school teams



### Infrastructure development

Conducted a clean water program to ensure clean water distribution, benefiting 250 families in one village



Conducted an electricity program in one village – benefiting 250 residents by providing and operating two sets of 350 kVA generators and maintaining electrical networks

- For more information on community rights, programs, and grievances, see [PT TBP's 2023 Sustainability Report](#) (p. 148).
- See also [Lygend's 2023 ESG report](#) (p. 49–50).

# APPENDICES

## Materiality assessment process

### Process overview

#### Topic review and identification

- Reviewed and revised 2021 material topics based on industry benchmarking, latest developments, external commentaries, and standards alignment

#### Prioritization

- Determined the importance of each topic, with input from the sustainability team and implementers
- Risk management team-led internal assessment with division heads and company topic champions

#### Stakeholder consultation and refinement

- Tested and revised topic inclusion and prioritization after consulting external stakeholders for PT TBP and PT HPL; drawn from applicable stakeholders from the PT TBP materiality process; consulted with a representative from Lygend specifically for this report

#### Validation and approval

- Validated the final materiality topics by the sustainability team; was approved by the PT TBP Board, the Lygend Board, and senior management

### Changes to material topics from ESG Report 2021

<p><b>New topics</b></p>	<ul style="list-style-type: none"> <li>• <b>Climate action:</b> to capture risk assessment and climate adaptation measures, with overarching plans to support a decarbonization strategy</li> <li>• <b>GHG emissions and air quality:</b> to specifically reflect GHG accounting, air quality measurement and reduction measures, and meet specific reporting requirements on GHG and air quality</li> <li>• <b>Emergency prevention and handling:</b> a topic extending from our existing environmental, safety and health focus area to specifically capture emergency preparedness and response plans</li> <li>• <b>Economic performance:</b> to clearly communicate how PT HPL contributes to the local economy</li> <li>• <b>Stakeholder engagement and transparency:</b> to align with our sustainability policy and roadmap and reflect our focus on stakeholder engagement to ensure we stay responsive to market sustainability requests</li> <li>• <b>Supply chain management:</b> included specifically to capture PT HPL’s approach to supplier engagement and managing ESG risks for EV battery supply chains</li> </ul>
<p><b>Revised/ updated topic names</b></p>	<ul style="list-style-type: none"> <li>• <b>Tailings and waste management:</b> formerly referred to as “Waste and effluent.” Tailings were specifically included in the topic name, given external scrutiny and specific standards reporting for GRI and SASB and a focus on PT HPL’s waste management approaches</li> <li>• <b>Water management:</b> formerly referred to as “Water”</li> <li>• <b>Business ethics and compliance:</b> formerly referred to as “Business ethics”</li> <li>• <b>Labor rights and practices:</b> formerly referred to as “Human rights”</li> <li>• <b>Community rights and support:</b> formerly referred to as “Local communities”</li> <li>• <b>Diversity and equal opportunity:</b> formerly referred to as “Equality”</li> <li>• <b>Training and development:</b> formerly referred to as “Workers’ competency”</li> <li>• <b>Prioritizing local:</b> formerly referred to as “Local workforce”</li> <li>• <b>Occupational health and safety:</b> formerly referred to as “Employee OHS”</li> </ul>



# Contributing to the SDGs

The United Nations Sustainable Development Goals (SDGs) are internationally recognized objectives that help us remain attentive to the broader global issues being addressed by public and private partners. PT TBP believes businesses play a crucial role in reaching these goals and has mapped its key actions and initiatives, including those of PT HPL, which contribute to relevant SDG targets.

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	E.g., supporting community health through CSR programs
	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., 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
	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 equality and fairness, 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	E.g., upholding human rights and principles of equality and fairness, conducting human rights due diligence assessment; ensuring a supportive and fulfilling work environment, and fair remuneration regardless of gender
	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., 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	E.g., conducting climate change risk assessment, monitoring GHG emissions, and implementing steps for reduction
	13.3	Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning	E.g., installing solar photovoltaics in suitable areas of our facility; expanding our renewable energy mix
	14.2	By 2020, sustainably manage and protect marine and coastal ecosystems to avoid significant adverse impacts, including by strengthening their resilience, and take action for their restoration in order 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., postmining plan for rehabilitation; Landscape Level Nature Risk Assessment (LNRA); biodiversity study
	15.5	Take urgent and significant action to reduce the degradation of natural habitats, halt the loss of biodiversity and, by 2020, protect and prevent the extinction of threatened species	



# Stakeholder engagement table

STAKEHOLDER GROUP	OBJECTIVES	METHOD OF ENGAGEMENT
Academics	Consultation on research and studies Talent recruitment	<ul style="list-style-type: none"> <li>• Site visits</li> </ul>
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"> <li>• Stakeholder trips and site visits</li> <li>• Regular meetings</li> </ul>
Community	Community empowerment and engagement programs Recruitment and training of local workers Upholding community rights and addressing needs	<ul style="list-style-type: none"> <li>• CSR activities</li> <li>• Community grievance system</li> <li>• Community consultation and engagement programs</li> </ul>
Customers	Economic performance Business development Product quality Meeting sustainability requirements	<ul style="list-style-type: none"> <li>• Stakeholder trips and site visits</li> <li>• Feedback forms</li> <li>• Meetings and direct engagement</li> <li>• Annual and sustainability reports</li> <li>• Website</li> </ul>
Employees	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"> <li>• Internal meetings/publications/memos</li> <li>• Electronic communications</li> <li>• Training programs</li> <li>• SOPs</li> <li>• Company events and programs</li> <li>• Whistleblowing and complaints mechanism</li> </ul>
Government and regulatory bodies	Regulatory compliance and licensing Regional and national socioeconomic performance Indirect economic impacts	<ul style="list-style-type: none"> <li>• Meetings</li> <li>• Regulatory audits</li> </ul>
Industry associations	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"> <li>• Forums and events</li> </ul>
Media	Transparency Access to information	<ul style="list-style-type: none"> <li>• Website</li> <li>• News</li> <li>• Site visits</li> </ul>
NGOs	Contributing to causes with Lygend Discussion and collaboration on critical issues	<ul style="list-style-type: none"> <li>• Charity contributions</li> <li>• Public consultations</li> </ul>
Shareholders	Company performance Organizational governance ESG assessments for sustainable financing	<ul style="list-style-type: none"> <li>• Shareholder meetings</li> <li>• Lygend annual reports</li> <li>• PT HPL sustainability reports</li> <li>• Website</li> <li>• Annual audits</li> </ul>
Suppliers and contractors	Responsible supply chain Transparency in procurement Supporting local suppliers	<ul style="list-style-type: none"> <li>• Supplier audits/assessments</li> <li>• Supplier policies</li> <li>• Supplier capacity building</li> </ul>

# Base data

## General disclosure

CATEGORY/ INDICATOR	DESCRIPTION	UOM	FY2023	FY2022	FY2021	FY2020
Production capacity	MHP	t/year	365,000	n/a	n/a	n/a
	equivalent in nickel sulfate	t/year	246,750	n/a	n/a	n/a
	equivalent in cobalt sulfate	t/year	31,800	n/a	n/a	n/a
Processing capacity	MHP	t/year	365,000	n/a	n/a	n/a
	NiSO <sub>4</sub>	t/year	246,750	n/a	n/a	n/a
	CoSO <sub>4</sub>	t/year	31,800	n/a	n/a	n/a
Production volume	MHP	tonnes	330,080	219,953	85,283	0
	NiSO <sub>4</sub>	tonnes	70,322	0	0	0
	CoSO <sub>4</sub>	tonnes	7,236	0	0	0
Employees	Total (headcount)	no.	6,969	4,642	3,075	1,224
	Male	no.	6,536	4,362	2,903	1,155
	Female	no.	433	280	172	69

## Good governance

CATEGORY/ INDICATOR	DESCRIPTION	UOM	FY2023	FY2022	FY2021	FY2020
Financial performance and environmental investments	Revenue	USD million	987.96	1,027.07	311.50	0.00
	Employee wages and benefits	USD million	104.54	55.69	21.35	4.15
	Payments to local government	USD million	63.43	0.00	0.00	0.00
	Payments to central government	USD million	270.55	11.65	6.23	2.88
	Environmental investment	IDR million	130,463.93	46,186.11	39,337.82	0.00

### Diversity and equal opportunity

Employees by age group	Below 30 years old	no.	3,901	3,040	1,517	444
	30-50 years old	no.	2,948	1,568	1,511	748
	More than 50 years old	no.	120	34	47	32
Employees by locality	Locals	no.	2,251	2,036	1,504	542
	Non-locals	no.	3,741	2,606	1,571	682
	Foreigners	no.	977	0	0	0
Employees by contract type	Permanent	no.	2,281	1,080	835	694
	Fixed-term contract	no.	4,688	3,562	2,240	530

BASE DATA

## Climate change

CATEGORY/ INDICATOR	DESCRIPTION	UOM	FY2023	FY2022	FY2021	FY2020
Energy consumption	Total energy consumption	GJ	8,475,599	7,832,205*	1,743,260	n/a
	Renewable sources	GJ	3,145,915	3,687,304*	118,902	n/a
	Non-renewable sources	GJ	5,329,684	4,144,901	1,624,358	n/a
Energy Intensity	Total	GJ/t MHP	25.68	35.61*	20.44	n/a
GHG emissions	Total GHG emission	tCO <sub>2</sub> e	1,861,116	1,038,208	200,829	n/a
	Direct (Scope 1) GHG emissions	tCO <sub>2</sub> e	866,913	679,608	200,829	n/a
	Indirect (Scope 2) GHG emissions	tCO <sub>2</sub> e	86	114	n/a	n/a
	Other indirect (Scope 3) GHG emissions	tCO <sub>2</sub> e	994,117	358,486	n/a	n/a
	GHG emission intensity: Scope 1 and 2 only	tCO <sub>2</sub> e / t Ni content	13.36	10.11*	n/a	n/a
Water management	Total water withdrawn	ML	46,202	27,662	7,262	750
	Surface water	ML	30,539	17,515	7,262	750
	Seawater for nickel processing	ML	15,663	10,147	n/a	n/a
	Total water discharge (to sea) **	ML	31,826	n/a	n/a	n/a
	Rainwater runoff - DP1	ML	18	n/a	n/a	n/a
	Nickel processing - DP2	ML	31,798	n/a	n/a	n/a
	Rainwater runoff - DP3	ML	11	n/a	n/a	n/a
	Total water consumption for domestic use and nickel processing**	ML	14,404	n/a	n/a	n/a

\*Data has been restated

\*\*Data was assured by KAP Purwanto, Sungkoro & Surja ([KAP PSS – EY] a member firm of Ernst & Young Global Limited) under the scope of PT TBP's 2023 sustainability report.

BASE DATA

## Human rights

CATEGORY/ INDICATOR	DESCRIPTION	UOM	FY2023	FY2022	FY2021	FY2020
New hires	Male	no.	2,304	3,005	3,326	834
	Female	no.	152	192	171	60
	Under 30 years old	no.	1,473	2,190	2,198	428
	30–50 years old	no.	979	983	1,215	405
	Over 50 years old	no.	4	24	84	61
	Local	no.	552	1,274	1,824	344
	Non-local	no.	1,510	1,667	1,250	320
	Foreigner	no.	366	256	423	230
Turnover rates by age group	Under 30 years old	%	16.74%	8.32%	7.58%	7.21%
	30–50 years old	%	15.64%	10.33%	5.63%	3.74%
	Over 50 years old	%	15.83%	14.71%	17.02%	71.88%
Parental leave	Employees entitled to parental leave	no.	2,254	1,615	1,050	464
	Employees took parental leave	no.	38	28	25	23
	Employees returned to work after parental leave ended	no.	0*	28	25	23
	Employees still employed 12 months after their return to work from parental leave	no.	0*	16	12	6
Talent development	Average hours of training per employee per year	hours	13.21	1.38	1.79	0.06
	Total training hours	hours	92,032	6,405	5,491	72

\*Data will be reflected in 2024.



## BASE DATA

CATEGORY/ INDICATOR	DESCRIPTION	UOM	FY2023	FY2022	FY2021	FY2020
<b>Occupational health and safety</b>						
For employees	High-consequence work related injuries	no.	1	0	0	0
	Recordable work injuries	no.	61	55	51	0
	Total days lost due to work related injuries	no.	77	0	0	0
	Total hours worked	no.	16,939,008	8,115,172	1,876,414	18,248,832
	Near misses	no.	21	16	19	16
For contractors	High-consequence work related injuries	no.	0	0	0	0
	Recordable work injuries	no.	90	76	88	0
	Total days lost due to work related injuries	no.	0	77	0	0
	Total hours worked	no.	9,224,353	14,144,632	5,993,546	0
	Near misses	no.	5	13	11	14
Prioritizing locals	Total suppliers	no.	403	188	113	84
	Local suppliers	no.	43	19	13	9
	Total procurement value including imports	IDR billion	8,188,723.09	1,570.00	881.00	727.00
	Local procurement value	IDR billion	3,040.00	4.94*	2.36*	1.41*

\*Local procurement spend figures in 2020, 2021 and 2022 are restated.

# Tailings storage inventory as of December 2023

[SASB EM-MM-540a.1]

FACILITY NAME	P23	P89
Location	The location for storing B3 waste is in the former P23 mining region in the PT <i>Trimegah Bangun Persada</i> operational area in Kawasi Village, Obi District, South Halmahera regency, North Maluku Province.	
Ownership status	PT TBP	PT TBP
Operational status	Operational	Non-operational
Maximum permitted storage capacity	12,919,544 m <sup>3</sup>	12,880,871 m <sup>3</sup>
Current amount of tailings stored	28,399,985 t	28,862,204 t
Consequence classification	III	III

## Most recent independent technical review

Date	2022
Material findings	<p>VII.1 Conclusion</p> <ol style="list-style-type: none"> <li>The morphology of the research zone is a structural area with steep to very steep slopes.</li> <li>The geology of the research location is dominated by an ultramafic peridotite rock type that has undergone partial metamorphism and is intensely fractured – minor faults have been observed.</li> <li>The foundation of the main dam is peridotite rock with class CL and CM under residual soil with a thickness of 0–2 meters. The cliff conditions on the left and right supports are relatively steep, with an average slope of 35 degrees.</li> <li>The foundation on the auxiliary is a dense layer of soil on the right abutment with a thickness of more than 5 meters and thinning on the left abutment with a thickness of around 3 meters.</li> <li>The permeability value in residual soil based on field permeability testing ranges from 10<sup>-3</sup> to 10<sup>-4</sup>; the CL-class soil has a large permeability between 10<sup>-3</sup> to 10<sup>-1</sup>, with tight joint conditions.</li> </ol> <p>VII.2 Suggestions</p> <ol style="list-style-type: none"> <li>Several springs emerge at the primary dam location due to excavation. Further analysis will need to be conducted concerning the construction implementation method.</li> <li>Consider soil protection on slopes with a slope of 35 degrees or more because they can become critical zones when filling tailings.</li> </ol>

## Regulatory limits for water discharge parameters

Parameter	Discharge limits by location (mg/L)			
	DP 1, DP 2	DP3	GW-06, GW-07, GW-08	Collection pond
pH	6–9	6–9	6.5–10.5	6–9
Hexavalent chromium (Cr <sup>6+</sup> )	0.1	0.1	0.58	0.5
Total suspended solids (TSS)	100	200		200
Cobalt	0.4	0.4	0.008	0.4
Nickel	0.5	0.5	0.096	0.2

### Notes:

- DP = discharge points; GW = groundwater point.
- TSS is not an applicable criterion for groundwater monitoring.

# 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. Our 2023 Sustainability Report has been prepared in accordance with the 2021 GRI Standards. Our GRI Content Index references the following: the [Harita Nickel's 2023 Sustainability Report \(PT TBP SR2023\)](#), [Lygend Resources ESG Report 2023](#), [PT HPL website](#), and [Harita Nickel's website](#).

<b>STATEMENT OF USE</b>	PT Halmahera Persada Lygend (HPL) has reported in accordance with the GRI Standards for the period of 1 January 2023 to 31 December 2023.
<b>GRI 1 USED</b>	GRI 1: Foundation 2021

<b>GRI STANDARD</b>	<b>DISCLOSURE</b>	<b>LOCATION</b>
<b>GRI 2: General Disclosures 2021</b>	2-1 Organizational details	About PT HPL, p. 9
	2-2 Entities included in the organization's sustainability reporting	About this report, p. 3
	2-3 Reporting period, frequency, and contact point	About this report, p. 3 Contact, p. 82
	2-4 Restatements of information	Available throughout where relevant
	2-5 External assurance	About PT HPL, p. 9 Limited assurance statement, p. 51
	2-6 Activities, value chain, and other business relationships	About PT HPL, p. 9 Supply chain management, p. 21 Base data, p. 46
	2-7 Employees	Prioritizing the local economy, p. 39
	2-8 Workers who are not employees	Diversity and equal opportunity, p. 18
	2-9 Governance structure and composition	Good governance, p. 16 <a href="#">PT TBP SR2023</a> , p. 55 <a href="#">Lygend ESG Report 2023</a> , p. 17
	2-10 Nomination and selection of the highest governance body	<a href="#">PT TBP SR2023</a> , p. 142 <a href="#">Lygend AR2023</a> , p. 41
	2-11 Chair of the highest governance body	<a href="#">PT TBP SR2023</a> <a href="#">Lygend AR2023</a>
	2-12 Role of the highest governance body in overseeing the management of impacts	<a href="#">PT TBP SR2023</a> , p. 55 <a href="#">PT TBP SR2023</a> , p. 148 <a href="#">Lygend AR2023</a> , p. 43
	2-13 Delegation of responsibility for managing impacts	Good governance, p. 16 <a href="#">PT TBP SR2023</a> , p. 55

## GRI CONTENT INDEX

GRI STANDARD	DISCLOSURE	LOCATION
<b>GRI 2: General Disclosures 2021</b>	2-14 Role of the highest governance body in sustainability reporting	Good governance, p. 16
	2-15 Conflicts of interest	<a href="#">PT TBP SR2023</a> , p. 124 <a href="#">Lygend AR2023</a> , p. 45
	2-16 Communication of critical concerns	Whistleblowing and grievances, p. 17
	2-17 Collective knowledge of the highest governance body	<a href="#">Lygend AR2023</a> , p. 38
	2-18 Evaluation of the performance of the highest governance body	<a href="#">PT TBP SR2023</a> , p. 124 <a href="#">Lygend AR2023</a> , p. 45
	2-19 Remuneration policies	<a href="#">PT TBP SR2023</a> , p. 124 <a href="#">Lygend AR2023</a> , p. 45
	2-20 Process to determine remuneration	<a href="#">PT TBP SR2023</a> , p. 124 <a href="#">Lygend AR2023</a> , p. 45
	2-21 Annual total compensation ratio	<a href="#">PT TBP SR2023</a> , p. 124 <a href="#">Lygend AR2023</a> , p. 45
	2-22 Statement on sustainable development strategy	Message from the Director of PT TBP, p. 4 Message from the Director of Lygend, p. 6
	2-23 Policy commitments	Our approach to sustainability, p. 12 Human rights, p. 34 <a href="#">PT TBP Sustainability Policy</a>
	2-24 Embedding policy commitments	Our approach to sustainability, p. 12 Human rights, p. 34 <a href="#">PT TBP Sustainability Policy</a>
	2-25 Processes to remediate negative impacts	Whistleblowing and grievances, p. 17 Surrounding community, p. 40
	2-26 Mechanisms for seeking advice and raising concerns	Whistleblowing and grievances, p. 17 Surrounding community, p. 40
	2-27 Compliance with laws and regulations	Business ethics and compliance, p. 17
	2-28 Membership associations	Stakeholder engagement table, p. 45
	2-29 Approach to stakeholder engagement	Stakeholder engagement table, p. 45
2-30 Collective bargaining agreements	Wages and benefits, p. 35	



## GRI CONTENT INDEX

GRI STANDARD	DISCLOSURE	LOCATION
<b>GRI 3: Material Topics 2021</b>	3-1 Process to determine material topics	Materiality, p. 14
	3-2 List of material topics	Materiality, p. 14
	3-3 Management of material topics	About PT HPL, p. 9 Stakeholder engagement, p. 20 Business ethics and compliance, p. 17 Supply chain management, p. 21 Climate action, p. 23 Energy use, p. 23 GHG emissions and air quality, p. 25 Water management, p. 28 Tailings and waste management, p. 31 Emergency prevention and handling, p. 33 Diversity and equal opportunity, p. 18 Occupational health and safety, p. 37 Prioritizing the local economy, p. 39 Surrounding communities, p. 40
<b>GRI 201: Economic Performance 2016</b>	201-1 Direct economic value generated and distributed	Base data, p. 46
	201-2 Financial implications and other risks and opportunities due to climate change	Climate action, p. 23
<b>GRI 202: Market Presence 2016</b>	202-1 Ratios of standard entry-level wage by gender compared to local minimum wage	Wages and benefits, p. 35
	202-2 Proportion of senior management hired from the local community	<a href="#">PT TBP SR2023</a> , Prioritizing a local workforce, p. 139
<b>GRI 203: Indirect Economic Impacts 2016</b>	203-1 Infrastructure investments and services supported	Surrounding communities, p. 40
	203-2 Significant indirect economic impacts	Surrounding communities, p. 40
<b>GRI 204: Procurement Practices 2016</b>	204-1 Proportion of spending on local suppliers	Prioritizing the local economy, p. 39
<b>GRI 205: Anti-corruption 2016</b>	205-1 Operations assessed for risks related to corruption	Information unavailable - We do not conduct this level of risk assessment at our operations at this point in time.
	205-2 Communication and training about anti-corruption policies and procedures	Business ethics and compliance, p. 17
	205-3 Confirmed incidents of corruption and actions taken	Information unavailable

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GRI STANDARD	DISCLOSURE	LOCATION
<b>GRI 302: Energy 2016</b>	302-1 Energy consumption within the organization	Energy use, p. 23
	302-2 Energy consumption outside of the organization	<a href="#">PT TBP SR2023</a> , p. 77
	302-3 Energy intensity	Energy use, p. 23
	302-4 Reduction of energy consumption	Energy use, p. 23
	302-5 Reductions in energy requirements	Energy use, p. 23
<b>GRI 303: Water and Effluents 2018</b>	303-1 Interactions with water as a shared resource	Water management, p. 28
	303-2 Management of water discharge-related impacts	Water management, p. 28
	303-3 Water withdrawal	Water management, p. 28
	303-4 Water discharge	Base data, p. 46
	303-5 Water consumption	Base data, p. 46
<b>GRI 305: Emissions 2016</b>	305-1 Direct (Scope 1) GHG emissions	GHG emissions and air quality, p. 25
	305-2 Energy indirect (Scope 2) GHG emissions	GHG emissions and air quality, p. 25
	305-3 Other indirect (Scope 3) GHG emissions	GHG emissions and air quality, p. 25
	305-4 GHG emissions intensity	<a href="#">PT TBP SR2023</a> , p. 82
	305-5 Reduction of GHG emissions	<a href="#">PT TBP SR2023</a> , p. 82
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	GHG emissions and air quality, p. 25
<b>GRI 306: Waste 2020</b>	306-1 Waste generation and significant waste-related impacts	Tailings and waste management, p. 31
	306-2 Management of significant waste-related impacts	Tailings and waste management, p. 31
	306-3 Waste generated	Tailings and waste management, p. 31
	306-4 Waste diverted from disposal	<a href="#">PT TBP SR2023</a> , p. 95
	306-5 Waste directed to disposal	<a href="#">PT TBP SR2023</a> , p. 95
<b>GRI 308: Supplier Environmental Assessment 2016</b>	308-1 New suppliers that were screened using environmental criteria	Information unavailable - Supplier ESG due diligence process is being developed in 2024.
	308-2 Negative environmental impacts in the supply chain and actions taken	

## GRI CONTENT INDEX

GRI STANDARD	DISCLOSURE	LOCATION
<b>GRI 401: Employment 2016</b>	401-1 New employee hires and employee turnover	Wages and benefits, p. 35
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Wages and benefits, p. 35
	401-3 Parental leave	Wages and benefits, p. 35 Base data, p. 46
<b>GRI 402: Labor/ Management Relations 2016</b>	402-1 Minimum notice periods regarding operational changes	<a href="#">PT TBP SR2023</a> , p. 129
<b>GRI 403: Occupational Health and Safety 2018</b>	403-1 Occupational health and safety management system	Occupational health and safety, p. 37
	403-2 Hazard identification, risk assessment, and incident investigation	Occupational health and safety, p. 37
	403-3 Occupational health services	Occupational health and safety, p. 37
	403-4 Worker participation, consultation, and communication on occupational health and safety	Information unavailable
	403-5 Worker training on occupational health and safety	Occupational health and safety, p. 37
	403-6 Promotion of worker health	Information unavailable
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	<a href="#">PT TBP SR2023</a> , p. 141
	403-8 Workers covered by an occupational health and safety management system	Occupational health and safety, p. 37
	403-9 Work-related injuries	Occupational health and safety, p. 37
	403-10 Work-related ill health	Information unavailable
<b>GRI 404: Training and Education 2016</b>	404-1 Average hours of training per year per employee	Training and development, p. 36 <a href="#">PT TBP SR2023</a> , p. 130
	404-2 Programs for upgrading employee skills and transition assistance programs	Training and development, p. 36 <a href="#">PT TBP SR2023</a> , p. 130
	404-3 Percentage of employees receiving regular performance and career development reviews	Information unavailable
<b>GRI 405: Diversity and Equal Opportunity 2016</b>	405-1 Diversity of governance bodies and employees	Diversity and equal opportunity, p. 18
	405-2 Ratio of basic salary and remuneration of women to men	Diversity and equal opportunity, p. 18
<b>GRI 406: Non-discrimination 2016</b>	406-1 Incidents of discrimination and corrective actions taken	Diversity and equal opportunity, p. 18

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GRI STANDARD	DISCLOSURE	LOCATION
<b>GRI 407: Freedom of Association and Collective Bargaining 2016</b>	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	<a href="#">PT TBP SR2023</a> , p. 129
<b>GRI 408: Child Labor 2018</b>	408-1 Operations and suppliers at significant risk for incidents of child labor	No child and forced labor, p. 36
<b>GRI 409: Forced or Compulsory Labor 2016</b>	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	No child and forced labor, p. 36
<b>413: Local Communities 2016</b>	413-1 Operations with local community engagement, impact assessments, and development programs	Surrounding communities, p. 40 <a href="#">PT TBP SR2023</a> , p. 148 <a href="#">Lygend ESG Report 2023</a> , p. 49-50
	413-2 Operations with significant actual and potential negative impacts on local communities	Surrounding communities, p. 40 <a href="#">PT TBP SR2023</a> , p. 148

# IFRS Index

The international Financial Reporting Standards Foundation (IFRS) Sustainability Standards are developed in two sets, IFRS S1 and IFRS S2. IFRS S1 provides a set of disclosure requirements designed to enable companies to communicate to investors about the sustainability-related risks and opportunities faced over the short-, medium- and long-term while IFRS S2 sets out specific climate-related disclosures. Our IFRS disclosure Indicators references our 2023 Sustainability Report and the [Harita Nickel website](#).

## IFRS S1

PAR	INDICATOR	LOCATION OF DISCLOSURE
<b>Governance</b>		
	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:	
	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);	<a href="#">Charter of Sustainability &amp; Diversity Committee - Responsibilities</a> <a href="#">Ethics &amp; Risk Committee Charter</a>
	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;	<a href="#">Charter of Sustainability &amp; Diversity Committee - Resource and Authority</a> <a href="#">Ethics &amp; Risk Committee Charter</a>
	how and how often the body(s) or individual(s) is informed about sustainability-related risks and opportunities;	Good governance, p. 16
27	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; and	<a href="#">PT TBP SR2023</a> - Governance overview, p. 55
	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 (see paragraph 51), including whether and how related performance metrics are included in remuneration policies.	<a href="#">PT TBP SR2023</a> - Target and progress, p. 22-25
	management's role in the governance processes, controls and procedures used to monitor, manage and oversee sustainability-related risks and opportunities, including information about:	
	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; and	<a href="#">Charter of Sustainability &amp; Diversity Committee - Responsibilities</a> <a href="#">Ethics &amp; Risk Committee Charter</a>
<b>Strategy</b>		
	An entity shall disclose information that enables users of general purpose financial reports to understand the sustainability-related risks and opportunities that could reasonably be expected to affect the entity's prospects. Specifically, the entity shall:	
30	describe sustainability-related risks and opportunities that could reasonably be expected to affect the entity's prospects	<a href="#">PT TBP SR2023</a> - IFRS S2 Risk/ Opportunity Table, p. 252–256
	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; and	<a href="#">PT TBP SR2023</a> - IFRS S2 Risk/ Opportunity Table, p. 252–256



PAR	INDICATOR	LOCATION OF DISCLOSURE
<b>Strategy</b>		
32	An entity shall disclose information that enables users of general purpose financial reports to understand the current and anticipated effects of sustainability-related risks and opportunities on the entity's business model and value chain. Specifically, the entity shall disclose:	
	a description of the current and anticipated effects of sustainability-related risks and opportunities on the entity's business model and value chain; and	<a href="#">PT TBP SR2023</a> - IFRS S2 Risk/ Opportunity Table, p. 252–256
33	An entity shall disclose information that enables users of general purpose financial reports to understand the effects of sustainability-related risks and opportunities on its strategy and decision-making. Specifically, the entity shall disclose information about:	
	how the entity has responded to, and plans to respond to, sustainability-related risks and opportunities in its strategy and decision-making;	Our approach to sustainability, p. 12 <a href="#">PT TBP SR2023</a> - New ten-year sustainability vision, p. 36
	the progress against plans the entity has disclosed in previous reporting periods, including quantitative and qualitative information; and	<a href="#">PT TBP SR2023</a> - Targets and progress, p. 22–25
	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. 23
35	Specifically, an entity shall disclose quantitative and qualitative information about:	
	how the entity expects its financial position to change over the short, medium and long term, given its strategy to manage sustainability-related risks and opportunities, taking into consideration:	
	its planned sources of funding to implement its strategy; and	Climate action, p. 23 <a href="#">PT TBP SR2023</a> - Developing our decarbonization strategy, p. 76
40	If an entity determines that it need not provide quantitative information about the current or anticipated financial effects of a sustainability-related risk or opportunity applying the criteria set out in paragraphs 38–39, the entity shall:	
	explain why it has not provided quantitative information;	<a href="#">PT TBP SR2023</a> - Toward sustainability-related financial disclosure, p. 48

PAR	INDICATOR	LOCATION OF DISCLOSURE
<b>Risk management</b>		
44	To achieve this objective, an entity shall disclose information about:	
	the processes and related policies the entity uses to identify, assess, prioritize and monitor sustainability-related risks, including information about:	
	the inputs and parameters the entity uses (for example, information about data sources and the scope of operations covered in the processes);	<a href="#">PT TBP SR2023</a> - Risk management, p. 60
	whether and how the entity uses scenario analysis to inform its identification of sustainability-related risks;	-
	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);	<a href="#">PT TBP SR2023</a> - Risk management, p. 60
	whether and how the entity prioritizes sustainability-related risks relative to other types of risk;	<a href="#">PT TBP SR2023</a> - Risk management, p. 60
	how the entity monitors sustainability-related risks; and	<a href="#">PT TBP SR2023</a> - Risk management, p. 60
<b>Metrics and targets</b>		
46	An entity shall disclose, for each sustainability-related risk and opportunity that could reasonably be expected to affect the entity's prospects:	
	metrics required by an applicable IFRS Sustainability Disclosure Standard; and	SASB disclosure index, p. 68
	metrics the entity uses to measure and monitor:	
	that sustainability-related risk or opportunity; and	IFRS Index, p. 58 SASB disclosure index, p. 68 <a href="#">PT TBP SR2023</a> - Target and progress, p. 22-25
	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.	<a href="#">PT TBP SR2023</a> - Target and progress, p. 22-25
48	Metrics disclosed by an entity applying paragraphs 45–46 shall include metrics associated with particular business models, activities or other common features that characterise participation in an industry.	Transparency and communication, p. 20 <a href="#">PT TBP SR2023</a> - Transparency and communication, p. 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:	
	the metric used to set the target and to monitor progress towards reaching the target;	<a href="#">PT TBP SR2023</a> - Target and progress, p. 22-25
	the specific quantitative or qualitative target the entity has set or is required to meet;	<a href="#">PT TBP SR2023</a> - Target and progress, p. 22-25
	the period over which the target applies;	<a href="#">PT TBP SR2023</a> - Target and progress, p. 22-25
	any milestones and interim targets;	<a href="#">PT TBP SR2023</a> - Target and progress, p. 22-25

PAR	INDICATOR	LOCATION OF DISCLOSURE
<b>General requirement</b>		
55	In addition to IFRS Sustainability Disclosure Standards:	
	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. 68
59	An entity shall identify:	
	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; and	Transparency and communication, p. 20 <a href="#">PT TBP SR2023</a> - Transparency and communication, p. 48
	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.	Transparency and communication, p. 20 <a href="#">PT TBP SR2023</a> - Transparency and communication, p. 48

## IFRS S2

PAR	INDICATOR	LOCATION OF DISCLOSURE
<b>Governance</b>		
6	To achieve this objective, an entity shall disclose information about:	
	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:	<a href="#">Charter of Sustainability &amp; Diversity Committee - Responsibilities</a>
	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);	Good governance, p. 16 <a href="#">PT TBP SR2023</a> - Governance overview, p. 55
	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;	Good governance, p. 16 <a href="#">PT TBP SR2023</a> - Governance overview, p. 55
	how and how often the body(s) or individual(s) is informed about climate-related risks and opportunities;	Good governance, p. 16 <a href="#">PT TBP SR2023</a> - Governance overview, p. 55
	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; and	Good governance, p. 16 <a href="#">PT TBP SR2023</a> - Governance overview, p. 55
	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 (see paragraphs 33–36), including whether and how related performance metrics are included in remuneration policies (see paragraph 29(g)).	Good governance, p. 16 <a href="#">PT TBP SR2023</a> - Governance overview, p. 55
management's role in the governance processes, controls and procedures used to monitor, manage and oversee climate-related risks and opportunities, including information about:		
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; and	Good governance, p. 16 <a href="#">PT TBP SR2023</a> - Governance overview, p. 55 <a href="#">Charter of Sustainability &amp; Diversity Committee, and Sustainability Policy</a>	
10	An entity shall disclose information that enables users of general purpose financial reports to understand the climate-related risks and opportunities that could reasonably be expected to affect the entity's prospects. Specifically, the entity shall:	
	describe climate-related risks and opportunities that could reasonably be expected to affect the entity's prospects;	<a href="#">PT TBP SR2023</a> - Climate Change Risk Assessment, p. 75 <a href="#">PT TBP SR2023</a> - IFRS S2 Risk/ Opportunity Table, p. 252–256
	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;	<a href="#">PT TBP SR2023</a> - Climate Change Risk Assessment, p. 75 <a href="#">PT TBP SR2023</a> - IFRS S2 Risk/ Opportunity Table, p. 252–256

PAR	INDICATOR	LOCATION OF DISCLOSURE
13	An entity shall disclose information that enables users of general purpose financial reports to understand the current and anticipated effects of climate-related risks and opportunities on the entity's business model and value chain. Specifically, the entity shall disclose:	
	a description of the current and anticipated effects of climate-related risks and opportunities on the entity's business model and value chain; and	<a href="#">PT TBP SR2023</a> - Climate Change Risk Assessment, p. 75 <a href="#">PT TBP SR2023</a> - IFRS S2 Risk/ Opportunity Table, p. 252–256
14	An entity shall disclose information that enables users of general purpose financial reports to understand the effects of climate-related risks and opportunities on its strategy and decision-making. Specifically, the entity shall disclose:	
	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:	<a href="#">PT TBP SR2023</a> - GHG Emissions, p. 82 <a href="#">PT TBP SR2023</a> - Biodiversity and ecosystem protection, p. 103 <a href="#">PT TBP SR2023</a> - Climate Change RiskAssessment (CCRA), p. 75
	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);	<a href="#">PT TBP SR2023</a> - Developing our decarbonization strategies, p. 76
	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);	<a href="#">PT TBP SR2023</a> - Sustainability energy initiatives, p. 79
	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; and	<a href="#">PT TBP SR2023</a> - Developing our decarbonization strategies, p. 76
	how the entity plans to achieve any climate-related targets, including any greenhouse gas emissions targets, described in accordance with paragraphs 33–36.	<a href="#">PT TBP SR2023</a> - Developing our decarbonization strategies, p. 76
	information about how the entity is resourcing, and plans to resource, the activities disclosed in accordance with paragraph 14(a).	<a href="#">PT TBP SR2023</a> - Developing our decarbonization strategies, p. 76
	quantitative and qualitative information about the progress of plans disclosed in previous reporting periods in accordance with paragraph 14(a).	<a href="#">PT TBP SR2023</a> - Targets and progress, p. 22-25



PAR	INDICATOR	LOCATION OF DISCLOSURE
21	If an entity determines that it need not provide quantitative information about the current or anticipated financial effects of a climate-related risk or opportunity applying the criteria set out in paragraphs 19–20, the entity shall:	
	explain why it has not provided quantitative information;	<a href="#">PT TBP SR2023</a> - Toward sustainability-related financial disclosure, p. 48
22	An entity shall disclose information that enables users of general purpose financial reports to understand the resilience of the entity's strategy and business model to climate-related changes, developments and uncertainties, taking into consideration the entity's identified climate-related risks and opportunities. The entity shall use climate-related scenario analysis to assess its climate resilience using an approach that is commensurate with the entity's circumstances (see paragraphs B1–B18). In providing quantitative information, the entity may disclose a single amount or a range. Specifically, the entity shall disclose:	
	the entity's assessment of its climate resilience as at the reporting date, which shall enable users of general purpose financial reports to understand:	
	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;	<a href="#">PT TBP SR2023</a> - Climate Change Risk Assessment (CCRA), p. 75
	how and when the climate-related scenario analysis was carried out, including:	
	information about the inputs the entity used, including:	<a href="#">PT TBP SR2023</a> - Climate Change Risk Assessment (CCRA), p. 75
	which climate-related scenarios the entity used for the analysis and the sources of those scenarios;	<a href="#">PT TBP SR2023</a> - Climate Change Risk Assessment (CCRA), p. 75
	whether the analysis included a diverse range of climate-related scenarios;	<a href="#">PT TBP SR2023</a> - Climate Change Risk Assessment (CCRA), p. 75
	whether the climate-related scenarios used for the analysis are associated with climate-related transition risks or climate-related physical risks;	<a href="#">PT TBP SR2023</a> - Climate Change Risk Assessment (CCRA), p. 75
	whether the entity used, among its scenarios, a climate-related scenario aligned with the latest international agreement on climate change;	<a href="#">PT TBP SR2023</a> - Climate Change Risk Assessment (CCRA), p. 75
	why the entity decided that its chosen climate-related scenarios are relevant to assessing its resilience to climate-related changes, developments or uncertainties;	<a href="#">PT TBP SR2023</a> - Climate Change Risk Assessment (CCRA), p. 75
what scope of operations the entity used in the analysis (for example, the operating locations and business units used in the analysis);	<a href="#">PT TBP SR2023</a> - Climate Change Risk Assessment (CCRA), p. 75	
25	To achieve this objective, an entity shall disclose information about:	
	the processes and related policies the entity uses to identify, assess, prioritize and monitor climate-related risks, including information about:	<a href="#">PT TBP SR2023</a> - Climate Change Risk Assessment (CCRA), p. 75
	the inputs and parameters the entity uses (for example, information about data sources and the scope of operations covered in the processes);	<a href="#">PT TBP SR2023</a> - Climate Change Risk Assessment (CCRA), p. 75
	whether and how the entity uses climate-related scenario analysis to inform its identification of climate-related risks;	<a href="#">PT TBP SR2023</a> - Climate Change Risk Assessment (CCRA), p. 75

PAR	INDICATOR	LOCATION OF DISCLOSURE
25	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);	<a href="#">PT TBP SR2023</a> - Climate Change Risk Assessment (CCRA), p. 75
	whether and how the entity prioritizes climate-related risks relative to other types of risk;	<a href="#">PT TBP SR2023</a> - Climate Change Risk Assessment (CCRA), p. 75
	how the entity monitors climate-related risks; and	<a href="#">PT TBP SR2023</a> - Climate Change Risk Assessment (CCRA), p. 75
	whether and how the entity has changed the processes it uses compared with the previous reporting period;	<a href="#">PT TBP SR2023</a> - Climate Change Risk Assessment (CCRA), p. 75
	the processes the entity uses to identify, assess, prioritize 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; and	<a href="#">PT TBP SR2023</a> - Climate Change Risk Assessment (CCRA), p. 75
	the extent to which, and how, the processes for identifying, assessing, prioritizing and monitoring climate-related risks and opportunities are integrated into and inform the entity's overall risk management process.	<a href="#">PT TBP SR2023</a> - Climate Change Risk Assessment (CCRA), p. 75
<b>Metrics and target</b>		
28	To achieve this objective, an entity shall disclose:	
	information relevant to the cross-industry metric categories (see paragraphs 29–31);	Refer to PAR 29
	industry-based metrics that are associated with particular business models, activities or other common features that characterise participation in an industry (see paragraph 32); and	Refer to disclosure required by Paragraph 32
	targets set by the entity, and any targets it is required to meet by law or regulation, to mitigate or adapt to climate-related risks or take advantage of climate-related opportunities, including metrics used by the governance body or management to measure progress towards these targets (see paragraphs 33–37).	<a href="#">PT TBP SR2023</a> - Targets and progress, p. 22–25
29	An entity shall disclose information relevant to the cross-industry metric categories of:	
	greenhouse gases—the entity shall:	
	disclose its absolute gross greenhouse gas emissions generated during the reporting period, expressed as metric tonnes of CO <sub>2</sub> equivalent (see paragraphs B19–B22), classified as:	
	Scope 1 greenhouse gas emissions;	GHG emissions and air quality, p. 25 Base data, p. 46
	Scope 2 greenhouse gas emissions; and	GHG emissions and air quality, p. 25 Base data, p. 46
	Scope 3 greenhouse gas emissions;	GHG emissions and air quality, p. 25 Base data, p. 46
	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 (see paragraphs B23–B25);	GHG emissions and air quality, p. 25 <a href="#">PT TBP SR2023</a> - Limited assurance statement, p. 195

PAR	INDICATOR	LOCATION OF DISCLOSURE
	disclose the approach it uses to measure its greenhouse gas emissions (see paragraphs B26–B29) including:	
	the measurement approach, inputs and assumptions the entity uses to measure its greenhouse gas emissions;	GHG emissions and air quality, p. 25 Base data, p. 46
	the reason why the entity has chosen the measurement approach, inputs and assumptions it uses to measure its greenhouse gas emissions; and	GHG emissions and air quality, p. 25 <a href="#">PT TBP SR2023</a> - New real-time monitoring of air emissions, p. 85
	for Scope 1 and Scope 2 greenhouse gas emissions disclosed in accordance with paragraph 29(a)(i)(1)–(2), disaggregate emissions between:	
	the consolidated accounting group (for example, for an entity applying IFRS Accounting Standards, this group would comprise the parent and its consolidated subsidiaries); and	GHG emissions and air quality, p. 25
	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);	GHG emissions and air quality, p. 25
29	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 (see paragraphs B30–B31); and	GHG emissions and air quality, p. 25
	for Scope 3 greenhouse gas emissions disclosed in accordance with paragraph 29(a)(i)(3), and with reference to paragraphs B32–B57, disclose:	
	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); and	GHG emissions and air quality, p. 25
	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 (see paragraphs B58–B63);	Not applicable
	internal carbon prices—the entity shall disclose:	
	an explanation of whether and how the entity is applying a carbon price in decision-making (for example, investment decisions, transfer pricing and scenario analysis); and	<a href="#">PT TBP SR2023</a> - Developing our decarbonization strategies, p. 76
	the price for each metric tonne of greenhouse gas emissions the entity uses to assess the costs of its greenhouse gas emissions;	Not applicable

PAR	INDICATOR	LOCATION OF DISCLOSURE
	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:	
	the metric used to set the target (see paragraphs B66–B67);	<a href="#">PT TBP SR2023</a> - Targets and progress, p. 22–25
	the objective of the target (for example, mitigation, adaptation or conformance with science-based initiatives);	Climate action, p. 23
	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);	<a href="#">PT TBP SR2023</a> - Targets and progress, p. 22–25
33	the period over which the target applies;	<a href="#">PT TBP SR2023</a> - Targets and progress, p. 22–25
	the base period from which progress is measured;	<a href="#">PT TBP SR2023</a> - Targets and progress, p. 22–25
	any milestones and interim targets;	<a href="#">PT TBP SR2023</a> - 2023 sustainable energy initiatives, p. 79
	if the target is quantitative, whether it is an absolute target or an intensity target; and	<a href="#">PT TBP SR2023</a> - Targets and progress, p. 22–25
	how the latest international agreement on climate change, including jurisdictional commitments that arise from that agreement, has informed the target.	Climate action, p. 23 <a href="#">PT TBP SR2023</a> - Climate action, p. 74
	An entity shall disclose information about its approach to setting and reviewing each target, and how it monitors progress against each target, including:	
	whether the target and the methodology for setting the target has been validated by a third party;	<a href="#">PT TBP SR2023</a> - Developing our decarbonization strategies, p. 76
34	the entity's processes for reviewing the target;	<a href="#">PT TBP SR2023</a> - Developing our decarbonization strategies, p. 76
	the metrics used to monitor progress towards reaching the target; and	<a href="#">PT TBP SR2023</a> - Developing our decarbonization strategies, p. 76
	any revisions to the target and an explanation for those revisions.	Not applicable
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.	<a href="#">PT TBP SR2023</a> - Targets and progress, p. 22–25

PAR	INDICATOR	LOCATION OF DISCLOSURE
	For each greenhouse gas emissions target disclosed in accordance with paragraphs 33–35, an entity shall disclose:	
	which greenhouse gases are covered by the target.	<a href="#">PT TBP SR2023</a> - Targets and progress, p. 22–25
	whether Scope 1, Scope 2 or Scope 3 greenhouse gas emissions are covered by the target.	<a href="#">PT TBP SR2023</a> - Targets and progress, p. 22–25
	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 (see paragraphs B68–B69).	<a href="#">PT TBP SR2023</a> - Targets and progress, p. 22–25
	whether the target was derived using a sectoral decarbonization approach.	Not applicable
36	the entity's planned use of carbon credits to offset greenhouse gas emissions to achieve any net greenhouse gas emissions target. In explaining its planned use of carbon credits the entity shall disclose information including, and with reference to paragraphs B70–B71:	
	the extent to which, and how, achieving any net greenhouse gas emissions target relies on the use of carbon credits;	GHG emissions and air quality, p. 25
	which third-party scheme(s) will verify or certify the carbon credits;	Not applicable
	the type of carbon credit, including whether the underlying offset will be nature-based or based on technological carbon removals, and whether the underlying offset is achieved through carbon reduction or removal; and	Not applicable
	any other factors necessary for users of general purpose financial reports to understand the credibility and integrity of the carbon credits the entity plans to use (for example, assumptions regarding the permanence of the carbon offset).	Not applicable



# 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 2023 Sustainability Report has been prepared with reference to the SASB Standards on Metals and Mining. Our SASB Disclosure Index references this report and the [Harita Nickel website](#).

## Sustainability Disclosure Topics & Accounting Metrics

TOPIC	CODE	ACCOUNTING METRIC	CATEGORY	UNIT OF MEASURE	SOURCE OF DATA/ INFORMATION; MODIFICATIONS; REASONS FOR OMISSION
<b>Greenhouse gas emissions</b>	EM-MM-110a.1	Gross global Scope 1 emissions, percentage covered under emissions-limiting regulations	Quantitative	t CO <sub>2</sub> e, %	GHG emissions and air quality, p. 25 Base data, p. 46
	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	<a href="#">PT TBP SR2023</a> , p. 82
<b>Air quality</b>	EM-MM-120a.1	Air emissions of the following pollutants: (1) CO, (2) NO <sub>x</sub> (excluding N <sub>2</sub> O), (3) SO <sub>x</sub> , (4) particulate matter (PM10), (5) mercury (Hg), (6) lead (Pb), and (7) volatile organic compounds (VOCs)	Quantitative	kg	GHG emissions and air quality, p. 25 – Data on lead (Pb) and volatile organic compounds (VOC) not available.
<b>Energy Management</b>	EM-MM-130a.1	(1) Total energy consumed, (2) percentage grid electricity and (3) percentage renewable	Quantitative	GJ, %	Energy use, p. 23
<b>Water management</b>	EM-MM-140a.1	(1) Total water withdrawn, (2) total water consumed; percentage of each in regions with High or Extremely High Baseline Water Stress	Quantitative	ML, %	Water management, p. 28 Base data, p. 46  We do not operate in a water-stressed region
	EM-MM-140a.2	Number of incidents of non-compliance associated with water quality permits, standards and regulations	Quantitative	No.	Water management, p. 28

SASB DISCLOSURE INDEX

TOPIC	CODE	ACCOUNTING METRIC	CATEGORY	UNIT OF MEASURE	SOURCE OF DATA/ INFORMATION; MODIFICATIONS; REASONS FOR OMISSION
<b>Waste &amp; Hazardous Material Management</b>	EM-MM-150a.4	Total weight of non-mineral waste generated	Quantitative	t	<a href="#">PT TBP SR2023</a> , p. 95, p. 174
	EM-MM-150a.5	Total weight of tailings produced	Quantitative	t	Tailings and waste management, p. 31
	EM-MM-150a.6	Total weight of waste rock generated	Quantitative	t	No waste rock generated at operations
	EM-MM-150a.7	Total weight of hazardous waste generated	Quantitative	t	Tailings and waste management, p. 31
	EM-MM-150a.8	Total weight of hazardous waste recycled	Quantitative	t	<a href="#">PT TBP SR2023</a> , p. 95, p. 174
	EM-MM-150a.9	Number of significant incidents associated with hazardous materials and waste management	Quantitative	No.	<a href="#">PT TBP SR2023</a> , p. 60
	EM-MM-150a.10	Description of waste and hazardous materials management policies and procedures for active and inactive operations	Discussion and Analysis	n/a	<a href="#">PT TBP SR2023</a> , p. 95
<b>Biodiversity Impacts</b>	EM-MM-160a.1	Description of environmental management policies and practices for active sites	Discussion and Analysis	n/a	<a href="#">PT TBP SR2023</a> , p. 103
	EM-MM-160a.2	Percentage of mine sites where acid rock drainage is: (1) predicted to occur, (2) actively mitigated, and (3) under treatment or remediation	Quantitative	%	No acid rock drainage in nickel mining  We also conduct soil data analyses and geological studies to ensure that the ultramafic soil characteristics are maintained, and that it remains alkaline. This is soil that is naturally rich in nickel, cobalt and manganese content from bedrock in the region and can pose health risks when weathered or disturbed by operations.

SASB DISCLOSURE INDEX

TOPIC	CODE	ACCOUNTING METRIC	CATEGORY	UNIT OF MEASURE	SOURCE OF DATA/ INFORMATION; MODIFICATIONS; REASONS FOR OMISSION
<b>Biodiversity Impacts</b>	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	%	Not available
<b>Security, Human Rights &amp; Rights of Indigenous Peoples</b>	EM-MM-210a.1	Percentage of (1) proved and (2) probable reserves in or near areas of conflict	Quantitative	%	Surrounding communities, p. 40 <a href="#">PT TBP SR2023</a> , p. 148
	EM-MM-210a.2	Percentage of (1) proved and (2) probable reserves in or near indigenous land	Quantitative	%	Surrounding communities, p. 40 <a href="#">PT TBP SR2023</a> , p. 148
	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	Surrounding communities, p. 40 <a href="#">PT TBP SR2023</a> , p. 148
<b>Community Relations</b>	EM-MM-210b.1	Discussion of process to manage risks and opportunities associated with community rights and interests	Discussion and Analysis	n/a	Surrounding communities, p. 40 <a href="#">PT TBP SR2023</a> , p. 148
	EM-MM-210b.2	Number and duration of non-technical delays	Quantitative	No., days	<a href="#">PT TBP SR2023</a> , p. 148
<b>Labor Relations</b>	EM-MM-310a.1	Percentage of active workforce covered under collective bargaining agreements, broken down by U.S. and foreign employees	Quantitative	%	Wages and benefits, p. 35 - No collective bargaining agreements have been formed yet, however, employees are free to do so)
	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	<a href="#">PT TBP SR2023</a> , p. 147
<b>Workforce Health &amp; Safety</b>	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. 37 Base data, p. 46  Average hours of OHS training specifically not available, however number of employees that have received OHS training reported.

SASB DISCLOSURE INDEX

TOPIC	CODE	ACCOUNTING METRIC	CATEGORY	UNIT OF MEASURE	SOURCE OF DATA/ INFORMATION; MODIFICATIONS; REASONS FOR OMISSION
<b>Business Ethics &amp; Transparency</b>	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. 17
	EM-MM-510a.2	Production in countries that have the 20 lowest rankings in Transparency International's Corruption Perception Index	Quantitative	t saleable	Not applicable.
<b>Tailings Storage Facilities Management</b>	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	Tailings storage inventory as of December 2023, p. 50
	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. 31
	EM-MM-540a.3	Approach to development of Emergency Preparedness and Response Plans (EPRPs) for tailings storage facilities	Discussion and Analysis	n/a	Emergency prevention and handling, p. 33

**Sustainability Disclosure Topics & Accounting Metrics**

ACTIVITY METRIC	CODE	CATEGORY	UNIT OF MEASURE	SOURCE OF DATA/ INFORMATION; MODIFICATIONS; REASONS FOR OMISSIONS
<b>Production of (1) metal ores and (2) finished metal products</b>	EM-MM-000.A	Quantitative	t saleable	About PT HPL, p. 9 Base data, p. 46
<b>Total number of employees, percentage contractors</b>	EM-MM-000.B	Quantitative	No., %	Diversity and equal opportunity, p. 18 Base data, p. 46

# 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 (CO<sub>2</sub>e) |** 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 (Cr<sup>6+</sup>) |** 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.

**Landcape-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.

**Saprolite |** A type of rock or soil material that has undergone extensive weathering and usually forms in lower zones of soil profile.

**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

<b>ANCOLD</b>	Australian National Committee on Large Dams
<b>CCRA</b>	Climate Change Risk Assessment
<b>CEMS</b>	Continuous Emission Monitoring System
<b>CSR</b>	Corporate Social Responsibility
<b>DSTF</b>	Dry Stack Tailings Facility
<b>EMS</b>	Environmental Monitoring System
<b>ERP</b>	Emergency Response Plan
<b>ESG</b>	Environmental, Social and Governance
<b>EV</b>	Electric vehicle
<b>FeSO<sub>4</sub></b>	Ferrous sulfate
<b>FIHRRST</b>	Foundation for International Human Rights Reporting Standards
<b>GISTM</b>	Global Industry Standard on Tailings Management
<b>GJ</b>	Gigajoules
<b>GRI</b>	Global Reporting Initiative
<b>HIRA</b>	Hazard Identification and Risk Assessments
<b>HKEX</b>	Hong Kong Stock Exchange
<b>ICOLD</b>	International Committee on Large Dams
<b>IDR</b>	Indonesian Rupiah
<b>IFRS</b>	International Financial Reporting Standards
<b>ILO</b>	International Labor Organization
<b>IRMA</b>	Initiative for Responsible Mining Assurance
<b>ISO</b>	International Organization for Standardization
<b>LPG</b>	Liquified petroleum gas
<b>m</b>	Meters
<b>m<sup>3</sup></b>	Cubic meters
<b>mg/L</b>	Milligrams per liter
<b>MHP</b>	Mixed hydroxide precipitate
<b>ML</b>	Megaliters

<b>MW</b>	Megawatt
<b>NGO</b>	Non-governmental organization
<b>NO<sub>x</sub></b>	Nitrogen oxides
<b>OECD</b>	Organisation for Economic Cooperation and Development
<b>OHS</b>	Occupational health and safety
<b>PPE</b>	Personal protective equipment
<b>PT HPL</b>	PT Halmahera Persada Lygend
<b>PT TBP</b>	PT Trimegah Bangun Persada Tbk
<b>PV</b>	Photovoltaic
<b>QMS</b>	Quality management system
<b>RMI RMAP</b>	Responsible Minerals Initiative Responsible Minerals Assurance Process
<b>SASB</b>	Sustainability Accounting Standards Board
<b>SDGs</b>	United Nations Sustainable Development Goals
<b>SMK3</b>	Occupational Safety and Health Management System Standard ( <i>Sistem Manajemen Keselamatan dan Kesehatan Kerja</i> )
<b>SO<sub>2</sub></b>	Sulphur dioxide
<b>SOP</b>	Standard operating procedure
<b>t</b>	Tons
<b>tCO<sub>2</sub>e</b>	Tons of carbon dioxide equivalent
<b>TCFD</b>	Taskforce on Climate-related Financial Disclosure
<b>TPST</b>	<i>Tempat Pengolahan Sampah Terpadu</i>
<b>TRIFR</b>	Total recordable injury frequency rate
<b>TSS</b>	Total suspended solids
<b>USD</b>	United States Dollar
<b>WWTP</b>	Wastewater treatment plant

# Limited assurance statement

[GRI 2-5]



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*The original limited assurance report included herein is in the Indonesian language*

Laporan Keyakinan Terbatas Praktisi  
Independen

*Independent Practitioners' Limited Assurance  
Report*

Laporan No. 00034/2.1032/NS.0/02/0705-  
1/1/XI/2024

*Report No. 00034/2.1032/NS.0/02/0705-  
1/1/XI/2024*

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 ditugaskan oleh PT Halmahera Persada Lygend ("Perusahaan") untuk melaksanakan suatu perikatan keyakinan terbatas, sebagaimana yang didefinisikan oleh Standar Perikatan Asurans (SPA) 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 2023 dan untuk tahun yang berakhir pada tanggal tersebut ("Laporan Keberlanjutan") sebagaimana yang dispesifikasikan dalam Lampiran 1 dari laporan keyakinan terbatas 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 Standards on Assurance Engagement (SAE) 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 ("ICPA"), here after 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, 2023 and for the year then ended (the "Sustainability Report") as specified in Appendix 1 of this limited assurance report (the "Subject Matter Information").*



Laporan Keyakinan Terbatas Praktisi Independen (lanjutan)

Laporan No. 00034/2.1032/NS.0/02/0705-1/1/XI/2024 (lanjutan)

Ruang lingkup (lanjutan)

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:

- 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 ini.
- Informasi apapun (termasuk informasi keberlanjutan) sebelum tanggal 1 Januari 2023 dan setelah tanggal 31 Desember 2023.

*The original limited assurance report included herein is in the Indonesian language*

*Independent Practitioners' Limited Assurance Report (continued)*

*Report No. 00034/2.1032/NS.0/02/0705-1/1/XI/2024 (continued)*

*Scope (continued)*

*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 this information:*

- *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 limited assurance report.*
- *Any information (including sustainability information) prior to January 1, 2023 and subsequent to December 31, 2023.*



Laporan Keyakinan Terbatas Praktisi Independen (lanjutan)

Laporan No. 00034/2.1032/NS.0/02/0705-1/1/XI/2024 (lanjutan)

Kriteria yang digunakan oleh manajemen

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.

Tanggung jawab manajemen

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 original limited assurance report included herein is in the Indonesian language*

*Independent Practitioners' Limited Assurance Report (continued)*

*Report No. 00034/2.1032/NS.0/02/0705-1/1/XI/2024 (continued)*

*Criteria applied by management*

*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.*

*Management's responsibilities*

*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.*



Laporan Keyakinan Terbatas Praktisi Independen (lanjutan)

Laporan No. 00034/2.1032/NS.0/02/0705-1/1/XI/2024 (lanjutan)

Tanggung jawab praktisi independen

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 keyakinan terbatas kami.

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.

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

*The original limited assurance report included herein is in the Indonesian language*

*Independent Practitioners' Limited Assurance Report (continued)*

*Report No. 00034/2.1032/NS.0/02/0705-1/1/XI/2024 (continued)*

*Independent practitioners' responsibility*

*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 limited assurance engagement.*

*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.*

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





Laporan Keyakinan Terbatas Praktisi Independen (lanjutan)

Laporan No. 00034/2.1032/NS.0/02/0705-1/1/XI/2024 (lanjutan)

**Independensi kami dan pengendalian mutu**

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

Kami juga 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.

*The original limited assurance report included herein is in the Indonesian language*

*Independent Practitioners' Limited Assurance Report (continued)*

*Report No. 00034/2.1032/NS.0/02/0705-1/1/XI/2024 (continued)*

***Our independence and quality management***

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

*We also apply 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 ICPA, which requires that we design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.*



Laporan Keyakinan Terbatas Praktisi Independen (lanjutan)

Laporan No. 00034/2.1032/NS.0/02/0705-1/1/XI/2024 (lanjutan)

Penjelasan tentang prosedur-prosedur yang dilakukan

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.

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 pemeriksaan atas pengumpulan atau penghitungan data di dalam sistem Teknologi Informasi.

*The original limited assurance report included herein is in the Indonesian language*

*Independent Practitioners' Limited Assurance Report (continued)*

*Report No. 00034/2.1032/NS.0/02/0705-1/1/XI/2024 (continued)*

*Description of procedures performed*

*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.*

*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 Practitioners' Limited Assurance Report (continued)*

Laporan No. 00034/2.1032/NS.0/02/0705-1/1/XI/2024 (lanjutan)

*Report No. 00034/2.1032/NS.0/02/0705-1/1/XI/2024 (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 dalam penyusunan dan penyajian Informasi Hal Pokok 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 Subject Matter Information and related information, and applying analytical and other appropriate procedures.*

Prosedur keyakinan terbatas kami mencakup:

*Our limited assurance procedures included:*

- Melakukan interviu dengan personel kunci untuk memahami proses dalam pengumpulan, penyusunan dan pelaporan Informasi Hal Pokok selama periode pelaporan.
- Membandingkan bahwa kriteria perhitungan telah diterapkan dengan benar sesuai dengan metodologi yang diuraikan dalam Kriteria.
- Melakukan penghitungan ulang metrik kinerja untuk mengonfirmasi jumlah yang dinyatakan dapat direplikasi.
- Melakukan prosedur rewiu analitis untuk mendukung kewajaran data.
- Melakukan pengecekan, secara uji petik, atas sumber informasi dasar untuk memeriksa keakuratan data.

- *Conducting interviews with key personnel to understand the process for collecting, collating and reporting the Subject Matter Information during the reporting period.*
- *Comparing that the calculation criteria had been correctly applied in accordance with the methodologies outlined in the Criteria.*
- *Performing recalculations of performance metrics to confirm quantities stated were replicable.*
- *Undertaking analytical review procedures to support the reasonableness of the data.*
- *Vouching, on a sample basis, to underlying source information to check the validity of the data.*



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Laporan Keyakinan Terbatas Praktisi Independen (lanjutan)

*Independent Practitioners' Limited Assurance Report (continued)*

Laporan No. 00034/2.1032/NS.0/02/0705-1/1/XI/2024 (lanjutan)

*Report No. 00034/2.1032/NS.0/02/0705-1/1/XI/2024 (continued)*

#### Kesimpulan

Berdasarkan prosedur-prosedur kami dan bukti 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.

#### *Conclusion*

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

#### Tujuan laporan keyakinan terbatas

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

#### *Purpose of the limited assurance report*

*This independent practitioners' 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 Purwantono, Sungkoro & Surja

Susanti

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

29 November 2024/November 29, 2024

The original subject matter information included herein is in the Indonesian language

Lampiran 1. Informasi Hal Pokok untuk Keyakinan Terbatas Independen atas Laporan Keberlanjutan PT Halmahera Persada Lygend tanggal 31 Desember 2023 dan untuk tahun yang berakhir pada tanggal tersebut

Appendix 1. Subject Matter Information for Independent Limited Assurance of PT Halmahera Persada Lygend's Sustainability Report as of December 31, 2023 and for the year then ended

No	Indikator/Indicator	2023				
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)/ <i>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)</i>	Lokasi/ <i>Location</i>	Jenis Kelamin/ <i>Gender</i>	Upah Minimum Provinsi (Rp/Bulan)/ <i>Local minimum wage (Rp/Month)</i>	Gaji terendah (Rp/Bulan)/ <i>Lowest salary (Rp/Month)</i>	Rasio antar gaji terendah/ <i>Ratio between local minimum wage to lowest salary</i>
		Lapangan (Pulau Obi, Maluku Utara)/ <i>Site (Obi Island, North Maluku)</i>	Laki-laki/ <i>Male</i>	2.976.720	3.242.200	1,09
			Perempuan/ <i>Female</i>	2.976.720	3.242.200	1,09
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)/ <i>Total water discharge to all areas in megaliters and a breakdown by the types of destination (as part of GRI 303-4 Water discharge)</i>	Tujuan pembuangan air/ <i>Water discharge destination</i>			Total (dalam megaliter)/ <i>Total (in megaliter)</i>	
		Air laut dari pengolahan nikel/ <i>Seawater from nickel processing</i>			31.797	
		Air laut dari limpahan air hujan/ <i>Seawater from rainwater runoff</i>			29	
		Total pembuangan air/ <i>Total water discharge</i>			31.826	
3	Total konsumsi air dari semua wilayah dalam megaliter (sebagai bagian dari GRI 303-5 Konsumsi air)/ <i>Total water consumption from all areas in megaliters (as part of GRI 303-5 Water consumption)</i>	Konsumsi air/ <i>Water consumption</i>			Total (dalam megaliter)/ <i>Total (in megaliter)</i>	
		Untuk penggunaan domestik dan pengolahan nikel/ <i>For domestic use and nickel processing</i>			14.404	
		Total konsumsi air/ <i>Total water consumption</i>			14.404	
4	Berat total limbah yang ditimbulkan dalam metrik ton, dan perincian jumlah tersebut menurut komposisi limbah (sebagai bagian dari GRI 306-3 Timbulan limbah)/ <i>Total weight of waste generated and a breakdown by composition of the waste (as part of GRI 306-3 Waste generated)</i>	Limbah yang ditimbulkan per jenis/ <i>Waste generated by type</i>			Berat (dalam ton metrik)/ <i>Weight (in metric tons)</i>	
		Limbah tidak berbahaya/ <i>Non-hazardous waste</i>			55.042	
		Limbah berbahaya (tailings)/ <i>Hazardous waste (tailings)</i>			7.496.050	
		Limbah berbahaya (lainnya)/ <i>Hazardous waste (others)</i>			164	
		Total limbah yang ditimbulkan/ <i>Total weight of waste generated</i>			7.551.256	



PUBLICATION DATE:

**29 NOVEMBER 2024**

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[GRI 2-3]

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