






	POLICY WHISTLEBLOWING SYSTEM (WBS)		
	No. : CORSEC/043/IV-25/MP	Rev : 0	Tgl : 28 / 03 / 2025

LETTER OF APPROVAL

Jakarta, 28 March 2025

Enacted by:		
President Director  Garibaldi Thohir	Vice President Director  Christian Ariano Rachmat	Director  Michael William P. Soeryadjaya
Director  M. Syah Indra Aman	Director  Julius Aslan	Director  Iwan Dewono Budi Yuwono

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I. POLICY BACKGROUND AND PURPOSE

PT Alamtri Resources Indonesia Tbk (“**the Company**”) strives to apply good corporate governance and Corporate Values in carrying out business activities, in order to achieve its goals and objectives and prevent conducts that do not conform to the Corporate Values and/or have the potential to harm the Company and its subsidiaries (“**the Group**”). This is attained by the Company among others by providing a reporting system for reporting any action or suspected action of fraud, wrongdoing, or violation within the Group’s work environment (“**Violation(s)**”), which is managed professionally by an independent party (whistleblowing system). The report may be made anonymously or otherwise, in order to guarantee the confidentiality of the informer or the report on Violations. To support the implementation of the reporting system on Violations or whistleblowing system, the Company has prepared this WBS Policy to serve as a guideline for each user of the Company’s WBS, either the Group’s employees or other stakeholders.


II. RESPONSIBILITY

The supervision on the Company’s WBS is carried out by and under the responsibility of the members of the Company’s Board of Directors. The management of the Company’s WBS is carried out by an independent party and is under the responsibility of the members of the WBS Committee, that is, a committee at the Group level established by the Company’s Board of Directors that consists of the representatives of the Group’s management. In managing the Company’s WBS, the Company currently engages Deloitte as an independent party. Upon receiving a report on any Violation from the independent party, the WBS Committee will forward the report to the Company’s Board of Directors to be followed up by the relevant parties, either the Company’s or its subsidiaries’ management or Deloitte, in accordance with the applicable procedure. The WBS Committee also regularly reports to the Company’s Board of Directors on the handling process and progress of the report on Violations.

III. REPORTING SCOPE AND MECHANISM

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

1. The scope of Violations that may be reported through the Company’s WBS among others concern:
 - a. Corruption;
 - b. Bribery/Gratification;
 - c. Fraud;
 - d. Theft/Embezzlement;
 - e. Extortion;
 - f. Forgery;
 - g. Conflict of Interest;
 - h. Harassment;
 - i. Violation of the Law; and
 - j. Violation of the Company Regulations/Collective Labor Agreements
2. The reporting on Violations may be made through the channels provided, among others:
 - The whistleblowing system menu on the Company’s website;

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- Telephone: 021-5088 6348;
- SMS/Whatsapp: 081 1199 23337;
- Facsimile: 021-5088 6347;
- Postal: PO Box 2617, JKP 10026.

3. The requirements for reporting Violations:
 - a. The reports may be made entirely anonymously, partly anonymously, or with full disclosure of the informer's identity, supported with the information or initial evidence of Violations.
 - b. The reports conveyed shall not be of personal complaints or problems. Each reporting on Violation shall fulfill the requirement of being impartial on ethnicity, race, religion, and group, and not being defamation and/or hoax.
4. Follow-ups on Violations:
 - a. The Company will respond to the parties reporting the Violations through the channels as explained in point 2 above.
 - b. Each report on Violations will be followed up and processed by the Company in accordance with the applicable procedure.

IV. PROTECTION FOR INFORMERS

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