



# PT. BANGKA PRIMA TIN

MINING - SMELTING - REFINERY - TRADING

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## GRIEVANCE PROCEDURE

### 1. Purpose / Tujuan.

This procedure regulates the process for receiving, recording, reviewing, investigating, responding to, and closing grievances related to the supply chain and due diligence system.

Prosedur ini mengatur proses penerimaan, pencatatan, penelaahan, investigasi, tindak lanjut, dan penutupan pengaduan terkait rantai pasok dan sistem uji tuntas.

### 2. Scope / Ruang Lingkup.

This procedure applies to all internal and external stakeholders, including workers, suppliers, contractors, communities, and other relevant parties who wish to report concerns related to supply chain risks, human rights, labor issues, bribery, money laundering, concealment of mineral origin, environmental issues, and other adverse impacts.

Prosedur ini berlaku untuk seluruh pihak internal dan eksternal, termasuk pekerja, pemasok, kontraktor, masyarakat, dan pihak terkait lainnya yang ingin menyampaikan pengaduan mengenai risiko rantai pasok, hak asasi manusia, isu ketenagakerjaan, penyuapan, pencucian uang, penyembunyian asal mineral, isu lingkungan, dan dampak merugikan lainnya.

### 3. Reporting Channels / Saluran Pengaduan.

Grievances may be submitted through:

Pengaduan dapat disampaikan melalui:

a. WhatsApp / Telephone: **0838 4059 9014**

b. Email: [bangkaprimatin77@gmail.com](mailto:bangkaprimatin77@gmail.com)

c. Website: <https://bangkaprimatin.id/>

d. Suggestion Box / **Kotak Saran**

e. Direct report to the designated person / laporan langsung kepada petugas yang ditunjuk

Anonymous grievances are accepted.

Pengaduan anonim dapat diterima.



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## 4. Responsible Person / Penanggung Jawab.

The grievance mechanism is coordinated by **Head of HRD** and overseen by **Senior Manager / KTT (Kepala Teknik Tambang / Head of Mining Engineering)**.

Mekanisme pengaduan dikoordinasikan oleh **Head of HRD** dan diawasi oleh **Senior Manager / KTT (Kepala Teknik Tambang / Head of Mining Engineering)**.

## 5. Principles / Prinsip.

The grievance mechanism shall be: legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogue.

Mekanisme pengaduan harus bersifat: sah/legitimate, mudah diakses, dapat diprediksi, adil, transparan, selaras dengan hak asasi manusia, menjadi sumber pembelajaran berkelanjutan, dan berbasis keterlibatan serta dialog.

## 6. Process / Proses.

### 6.1 Receipt and registration / Penerimaan dan pencatatan.

Every grievance received shall be recorded in the grievance log.

Setiap pengaduan yang diterima harus dicatat dalam log pengaduan.

### 6.2 Acknowledgement / Konfirmasi penerimaan.

If the complainant can be contacted, the company shall acknowledge receipt within **2 working days**.

Jika pengadu dapat dihubungi, perusahaan harus memberikan konfirmasi penerimaan dalam **2 hari kerja**.

### 6.3 Review and classification / Penelaahan dan klasifikasi.

The grievance shall be reviewed to determine issue type, risk level, and responsible reviewer.

Pengaduan harus ditelaah untuk menentukan jenis isu, tingkat risiko, dan penanggung jawab penelaahan.

### 6.4 Investigation / Investigasi.

The company shall investigate the grievance through document review, interview, observation, and coordination with the relevant department.

Perusahaan harus menginvestigasi pengaduan melalui penelaahan dokumen, wawancara, observasi, dan koordinasi dengan departemen terkait.



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## 6.5 Communication and dialogue / Komunikasi dan dialog.

Where possible, the complainant shall be informed of the process, status, and result of the grievance handling.

Apabila memungkinkan, pengadu harus diinformasikan mengenai proses, status, dan hasil penanganan pengaduan.

## 6.6 Corrective action and response / Tindakan perbaikan dan tanggapan.

If the grievance is substantiated, corrective action shall be determined, assigned, and followed up.

Jika pengaduan terbukti, tindakan perbaikan harus ditetapkan, ditugaskan, dan ditindaklanjuti.

## 6.7 Closure / Penutupan.

A grievance may only be closed after review is completed and corrective action or follow-up has been recorded.

Pengaduan hanya dapat ditutup setelah penelaahan selesai dan tindakan perbaikan atau tindak lanjut telah dicatat.

## 7. Timeline / Jangka Waktu.

a. Receipt logging: same day where practical.

Pencatatan pengaduan: pada hari yang sama apabila memungkinkan.

b. Acknowledgement: within **2 working days**.

Konfirmasi penerimaan: dalam **2 hari kerja**.

c. Initial review: within **5 working days**.

Penelaahan awal: dalam **5 hari kerja**.

d. Investigation and response: target within **30 calendar days**, depending on complexity.

Investigasi dan tanggapan: target dalam **30 hari kalender**, tergantung kompleksitas.

## 8. Fairness, confidentiality, and non-retaliation / Keadilan, kerahasiaan, dan anti-pembalasan.

The company shall ensure fair treatment, confidentiality where appropriate, no retaliation, and impartial review of grievances.

Perusahaan harus memastikan perlakuan yang adil, kerahasiaan apabila diperlukan, tidak ada pembalasan, dan penelaahan yang tidak memihak terhadap pengaduan.



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## 9. Records and reporting / Catatan dan pelaporan.

The company shall maintain at least: grievance log, complaint form, investigation record, communication record, corrective action record, and closure record.

Perusahaan harus memelihara setidaknya: log pengaduan, formulir pengaduan, catatan investigasi, catatan komunikasi, catatan tindakan perbaikan, dan catatan penutupan.

All records shall be retained for at least **5 years**.

Seluruh catatan harus disimpan sekurang-kurangnya selama **5 tahun**.

The company shall also prepare a periodic summary of grievance data, including the number of grievances received, resolved, and still open, and report this information in the Due Diligence Report in aggregated form without disclosing confidential personal details.

Perusahaan juga harus menyusun ringkasan berkala atas data pengaduan, termasuk jumlah pengaduan yang diterima, diselesaikan, dan yang masih terbuka, serta melaporkan informasi ini dalam Laporan Uji Tuntas secara agregat tanpa mengungkapkan rincian pribadi yang bersifat rahasia.

## 10. Continuous learning / Pembelajaran berkelanjutan.

Grievances shall be reviewed periodically to identify recurring issues, root causes, and opportunities for improvement, and the results shall be discussed in management review.

Pengaduan harus ditinjau secara berkala untuk mengidentifikasi isu berulang, akar masalah, dan peluang perbaikan, serta hasilnya harus dibahas dalam tinjauan manajemen.

## 11. Review of procedure / Tinjauan prosedur.

This procedure shall be reviewed at least once a year or whenever significant changes occur.

Prosedur ini harus ditinjau setidaknya satu kali setiap tahun atau setiap kali terjadi perubahan signifikan.

This procedure is effective since March 2<sup>nd</sup>, 2026.

Prosedur ini efektif sejak 2 Maret 2026.

Director



Budiharto