



The RMI Responsible Minerals Assurance Process (RMAP) Final Full Assessment Report (Workbook)

Assessment Number	G-RM-10001512
Audited Facility	PT Bangka Prima Tin
Assessment Date	11/27/2023 - 11/27/2023

Assessment Information	
RMAP ID	G-RM-10001512
Assessment Start Date	11/27/2023
Assessment End Date	11/27/2023
Assessment Type	Re-assessment
Audit Firm	UL Responsible Sourcing
Metals	Tin
Auditor	Syamsul Wardi Fiscal Agusti Makalew

Facility Information	
Site Name	PT Bangka Prima Tin
RBA Site ID	G-SM-187
Facility Address	Jl. Pangkol RT.009, Air Mesu Timur, Kecamatan Pangkalan Baru
Facility Country	Indonesia
Facility Point Of Contact	bangkaprimatin77@gmail.com
CID	CID002776

Overview

Company Info

CI-1 - Company Name (English)

PT. Bangka Prima Tin

CI-2 - Company Name (Local Language)

PT. Bangka Prima Tin

CI-3 - Company Website (if applicable)

<https://bangkaprimatin.id>

CI-4 - CID (As provided by RMI)

CID002776

CI-5 - Previous Assessment Period (mm/dd/yyyy - mm/dd/yyyy)

08/31/2021 - 09/02/2022

CI-6 - Current Assessment Period (mm/dd/yyyy - mm/dd/yyyy)

09/03/2022 - 10/31/2023

The information in this report is subject to the RMI auditee and auditor agreements. The content is final and not to be amended.



CI-7 - Assessment Start Date

11/27/2023

CI-8 - Assessment End Date

11/27/2023

CI-9 - Audit Firm (to be completed by auditor)

UL

CI-10 - Auditor name(s) (to be completed by auditor)

Fiscal Makalew / Syamsul Wardi

CI-11a - Contact Name

Mr. Andi Kurniawan

CI-11b - Contact Title

General Manager

CI-11c - Contact Email

bangkaprimatin77@gmail.com; yoanbz_dahsyat@yahoo.com

CI-11d - Contact Phone Number

6285228081555

CI-12a - Facility Address - Street

Jl. Pangkol RT.009, Air Mesu Timur, Kecamatan Pangkalan Baru

CI-12b - Facility Address - City

Kabupaten Bangka Tengah

CI-12c - Facility Address - State / Province

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Provinsi Kepulauan Bangka Belitung

CI-12d - Facility Address - Country

Indonesia

Company Operations

OP-1 - Please select the metal(s) being assessed for this facility

Tin

OP-2 - Is your company a member of TI-CMC?

No

Countries of Origin - Tin

CO-1 - How many countries of origin are used to acquire your mined materials?

1

Area of Origin of the Mined Materials

Conflict-Affected or High-Risk (yes/no)?

Indonesia

No

Intermediates and Secondary Materials - Tin

ISM-1 - How many Smelters were used for intermediates and secondary material ?

0

Recycled Materials - Tin

SRM-1 - How many countries were used to source recycled material?

0

High Risk Supply Chains - Tin

HR-1 - Does the company have any high-risk supply chains?

No

HR-2 - How many Red-flag suppliers and Conflict-Affected and High-Risk Areas and red flag(s) identified in the supply chain

Upstream Assurance Mechanisms

The information in this report is subject to the RMI auditee and auditor agreements. The content is final and not to be amended.



UP-1 - Is the company engaged in any upstream assurance mechanisms? (e.g. iTSCi, Better Sourcing Program, Fairmined, etc.)

No

UP-2 - Is due diligence conducted using an upstream assurance mechanism for ALL materials sourced from CAHRAs?

No

UP-3 - Please list any noteworthy achievements or best practices during the Assessment period the company would like to share with RMAP and/or the auditors (e.g. completed RRA).

None

Management Systems

Due Diligence Management System Design

DDD-1 - Does the company have a Supply Chain Policy?

Auditor Conclusion - Conform

Data Points

Data Point 1: Mr. Andi Kurniawan (General Manager) stated that the company has written Supply Chain Policy Data point 2: Auditor reviewed the renewed supply chain policy called PT Bangka Prima Tin - Supply Chain Policy, effective since January 9, 2023.

DDD-1a - Does the Supply Chain Policy meet the requirements of the standard?

Auditor Conclusion - Conform

Data Points

Data point 1: Auditor reviewed the supply chain policy. It is documented and effective as of January 9, 2023. It expresses the auditee's commitment not to source from CAHRAs and the commitment to avoid all risks referred to in the OECD Guidance Annex II Model Policy in their supply chain. It also expresses the auditee's commitment to the Five-Step Framework for Risk-Based Due Diligence in the Mineral Supply Chain. The policy is available for the public in the company's website (<https://bangkaprimatin.id>). Auditor was able to access the link and review the policies and procedures.

DDD-2 - Is there a procedure to identify Conflict-Affected and High-Risk Areas (CAHRAs)?

Auditor Conclusion - Conform

Data Points

Data point 1: Auditor reviewed PT Bangka Prima Tin Standard Policy & Procedure to Identify & Assess Conflict-Affected and High Risk Areas (CAHRA), dated October 2, 2023, which outlines the process to identify CAHRAs. The procedure states any country listed in Dodd-Frank Act or EU CAHRAs List will be automatically categorized as a CAHRA. In addition, the auditee will assess three criteria, i.e. conflict, governance, and human rights. A source will be considered High Risk in term of conflict if it scores 2.35 and above in Global Peace Index, High Risk in term of governance if it scores 70 and above in Fragile Peace Index, and High Risk in term of human right if it scores less than 0.550 in UNDP Human Development Index. If two of the three criteria scores High Risk, the source will be considered a CAHRA and the company will not source from there. Data point 2: Interviews with Mr. Andi Kurniawan (General Manager) and Ms. Celine Levin (RMAP Secretary) corroborated the procedure as written. Data point 3: Interview with one Admin employee collaborated the procedure as written.

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DDD-2a - Does the procedure clearly identify the criteria used by the company?

Auditor Conclusion - [Conform](#)

Data Points

Data point 1: Auditor reviewed the procedure which states that the criteria used are conflict, governance, and human right.

DDD-2b - Does the procedure to identify CAHRAs clearly define the resources used by the company?

Auditor Conclusion - [Conform](#)

Data Points

Data point 1: Auditor reviewed the procedure which states that the resources used are Global Peace Index for conflict, Fragile State Index for governance, and UNDP Human Development Index for human right. A source will be considered High Risk if it scores 2.35 and above in Global Peace Index, 70 and above in Fragile Peace Index, and less than 0.550 in UNDP Human Development Index. IT will be considered a CAHRA if two of the three criteria are High Risk.

DDD-2c - Does the procedure clearly identify the frequency for review by the company?

Auditor Conclusion - [Conform](#)

Data Points

Data point 1: Auditor reviewed the Procedure, which states that the CAHRA procedure will be reviewed annually.

DDD-3 - Is the procedure to identify CAHRAs reasonable?

Auditor Conclusion - [Conform](#)

Data Points

Data point 1: Based on the auditor's review of the procedure, the auditor finds it is reasonable because it makes a reference to Dodd-Frank Act and EU CAHRAs List when categorizing a country as a CAHRA. In addition, the procedure covers all three criteria (conflict, governance, and human right). For each criteria, the procedure uses acceptable references with reasonable threshold for each criteria. Then, it sets a clear guidance on when a source will fall into the category of CAHRA. Data point 2: Based on interviews with Mr. Andi Kurniawan (General Manager) and Ms. Celine Levin (RMAP Secretary), the auditor finds it is reasonable because the management knows what reference should be used for each category and does not seem to try to lower the benchmark. Data point 3: Based on the size and complexity of the supply chain, the auditor finds it is reasonable because the auditee is a small operation with a simple flow of production. They only process materials coming from the same province as legally required. Data point 4: Based on a sampling of 20 transactions coming from one supplier (facility's own mine), all materials are from Indonesia, specifically from Kepulauan Bangka Belitung Province, where the auditee is located. Reviewing the auditee's CAHRA assessment on the source, the auditor finds it reasonable as there seems to be no attempt to lower the risk.

DDD-4 - Is the procedure consistently implemented?

Auditor Conclusion - [Conform](#)

Data Points

Data point 1: The auditee sources from one supplier (facility's own mine) based in Indonesia only and it run Indonesia against the procedure. Based on the provided assessment result provided by the auditee, auditor found the auditee consistently run the only supplier against the procedure and come to the same conclusion. The supplier is categorized as Low Risk.



DDD-5 - Does the company have a process to collect and maintain all applicable records for 5 years?

Auditor Conclusion - Conform

Data Points

Data point 1: The auditor reviewed Kebijakan Penyimpanan Dokumen, dated January 9, 2023. The policy states the auditee will keep records for at least 5 years. Data point 2: Interview with Mr. Andi Kurniawan (General Manager) and Ms. Celine Levin (RMAP Secretary) confirmed that the company is committed to retain records for at least 5 years. Data point 3: The auditor sampled delivery order, warehouse receipt, and assay testing result for one tin ore transaction and delivery order, packing list, weight list, and certificate of analysis for one ingot from June 2022, when the auditee returned to production. The documents indicate the auditee has not destroyed any documents from the start of their operations since June 2022 as verified through their deed of establishment.

DDD-5a - Is the process consistently implemented?

Auditor Conclusion - Conform

Data Points

Data point 1: Based on a sampling of delivery order, warehouse receipt, and assay testing result for one tin ore transaction and delivery order, packing list, weight list, and certificate of analysis for one ingot from 2022, the auditee has not destroyed any document. Data point 2: According to Mr. Andi Kurniawan (General Manager), the auditee is committed to retain their documents for at least five (5) years. Data point 3: According to one Admin personnel and one employee from accounting, they have been instructed to maintain all records for at least five (5) years.

DDD-6 - Does the company have a process to receive, review, and respond to supply chain grievances?

Auditor Conclusion - Conform

Data Points

Data point 1: The auditor reviewed PT Bangka Prima Tin Grievance Policy dated January 9, 2023, which states that both internal and external parties can raise their grievances through the company's email address or the General Manager's phone number. Any grievances received will be handled by the General Manager and his team. He will be responsible for investigating and taking follow-up action as well as communicating the result of the investigation to related parties. Data point 2: Interview with Mr. Andi Kurniawan (General Manager) confirmed any parties can raise their grievances through his phone number or company's email address. He will be responsible for investigating the grievances and taking follow-up actions. When the process is completed, he will communicate the result of the investigation and corrective actions to related parties. Data point 3: Interviews with one Admin and one production employees confirmed they will raise their grievances to Mr. Andi Kurniawan (General Manager) if they have one. They have never had any grievance so far, though. Data point 4: There is no grievance logged so far.

DDD-6a - If the company uses a third party Grievance Mechanism, please provide a reference to the third party mechanism used.

Auditor Conclusion - N/A. the auditee does not use a third party grievance mechanism.

DDD-6b - Is the Grievance Mechanism made available to internal and external stakeholders?

Auditor Conclusion - Conform

Data Points



Data point 1: Auditor reviewed the auditee's grievance policy which states the grievance mechanism is available to both internal and external stakeholders. Any grievance will be addressed to Mr. Andi Kurniawan (General Manager) via phone number and email and will be reviewed and followed up. Data point 2: There policy is published through their website <https://bangkaprimatin.id>. Data point 3: Interviews with one employee from Admin and one from Production confirmed that employees are aware of the grievance mechanism and its scope. Data point 4: There is no record of grievances raised by internal and external parties so far. Data point 5: Minutes of meeting dated July 10, 2023, indicates the auditee communicated the grievance mechanism to their employees. No record of communication to business partners since there is no third party – business partner involved. The latest version of grievance policy is published.

DDD-6c - Is there a process to integrate feedback from the Grievance Mechanism into the risk identification process?

Auditor Conclusion - Conform

Data Points

Data point 1: Auditor reviewed the auditee's grievance procedure, which states that feedback received from grievance channels and the results of the investigation will be integrated to risk identification process in the next management system review. Data point 2: Interviews with Mr. Andi Kurniawan (General Manager) and Ms. Celine Levin (RMAP Secretary), confirmed all feedback received through the grievance mechanism and the resulting investigation will be brought up to the next management system review meeting as their effort to improve the risk identification process. Data point 3: There is no record of the auditee integrating feedback into the risk identification process as there is no grievance raised so far. Grievance mechanism is included in the meeting agenda, with a note that there is no grievance so far. Data point 4: There is no communication record to confirm that the auditee integrates the feedback into the risk identification process as there is no grievance raised so far.

DDD-7 - Is there a process to conduct a management review of the due diligence management system?

Auditor Conclusion - Conform

Data Points

Data point 1: Auditor reviewed Tinjauan Manajemen (Management review), document No. 4/2023, dated July 20, 2023, stating management system review will be performed on annual basis or more frequently if needed. Data point 2: Interview with Mr. Andi Kurniawan (General Manager) confirmed that there has been a review of the due diligence management system in 2022 and on July 20, 2023. Data point 3: Attendance list and minutes of meeting on due diligence management system review dated September 5, 2022 and July 20, 2023, confirmed that there is a review of the due diligence management system on annual basis.

DDD-7a - Does the process to conduct a management review of the due diligence management system meet the requirement of the standard? (i.e. does the process ensure continuing stability, adequacy and effectiveness?)

Auditor Conclusion - Conform

Data Points

Data point 1: Auditor reviewed the policy that ensures the process allows for continuing stability, adequacy and effectiveness. Data point 2: Interview with Mr. Andi Kurniawan (General Manager) confirmed that the focus of the review is to ensure continuing stability, adequacy, and effectiveness. Data point 3: Minutes of meeting of management system review on September 5, 2022 and July 20, 2023 confirmed that the review ensures continuing stability, adequacy, and effectiveness.

DDD-7b - Provide examples of how observations or results of the review have been integrated in the system.

Auditor Conclusion - One of the topic of the management system review was to report actual or potential risks found in the operation. The facility has provide special form to report such risks.

Due Diligence Management System Implementation



DDI-1 - Has the company appointed a senior manager to be responsible for the implementation of the due diligence management system?

Auditor Conclusion - Conform

Data Points

Data point 1: Surat Keputusan (Appointment Letter) number 02/SK/BPT/VI/2022 dated June 22, 2022, signed by Mr. Budiharto (Director), reflects Mr. Andi Kurniawan (General Manager) is appointed to be responsible for the implementation of due diligence management system and will report the result to the Director. Data point 2: Interviews with one employee from warehouse and one from office confirmed Mr. Andi Kurniawan (General Manager) is the senior manager. Data point 3: Interview with Mr. Andi Kurniawan (General Manager) confirm he is the senior manager appointed to be responsible for the implementation of due diligence management system. Data point 4: Organization chart of the auditee showed Mr. Andi Kurniawan (General Manager) is the highest rank personnel after the Director.

DDI-1a - Does this person have the competence, knowledge and experience to be responsible for the implementation of the due diligence management system?

Auditor Conclusion - Conform

Data Points

Data point 1: Auditor reviewed the CV/Resume of Mr. Andi Kurniawan (General Manager), which confirms this person has the competence, knowledge, and experience because he has the educational background in chemical engineering and has been working in tin industry in various roles since 2003. He has also completed 20 modules in eLearning Academy. In addition, he has completed training on mining supervision conducted by the Department of Energy and Mineral Resources in November 2021. Data point 2: Interviews with one employee from warehouse and one from production department confirmed Mr. Andi Kurniawan (General Manager) has the competence, knowledge, and experience because he has been in the industry for a long time. Data point 3: Interview with Mr. Andi Kurniawan (General Manager) confirmed he has the competence, knowledge, and experience because he has been working in the industry in various roles for 20 years. He has also attended training on management system and mining held by the Department of Energy and Mineral Resources.

DDI-1b - What is the process (formal or informal) to report findings on actual and/or potential risks identified in the supply chain to the appointed senior manager?

Auditor Conclusion - Conform

Data Points

Data Point 1: Mr. Siswandi (Head of Production) reported that whenever they have problems on production such as late receiving material or broken machinery, they have to report immediately to Mr. Andi Kurniawan (General Manager) to discuss the possible solution and implement the solution. The form is provided to record the problem and possible solution. Data Point 2: Ms. Celine Levin (RMAP Secretary) confirmed the form is provided to record the problem and possible solution. She will prepare the Corrective and Preventive Action form to ensure there is formal process to report finding or potential risk in supply chain to Senior Manager.

DDI-2 - Is there training to ensure relevant employees understand the due diligence management system and integrate it into their day-to-day operations?

Auditor Conclusion - Conform

Data Points

Data point 1: Interviews with one employee from warehouse and one from office confirmed they receive training on due diligence management system on an annual basis, with the last one taking place in July 17, 2023. Data point 2: Minutes of meeting, attendance records, training materials, and photos confirmed relevant employees receiving training on the due diligence management system on July 17, 2023. Data point 3: Interviews with Mr. Andi Kurniawan (General Manager) and Ms. Celine Levin (RMAP Secretary) confirmed relevant employees are trained on the due diligence management system. Data point 4: Posters of notifications on bulletin board indicated the auditee communicated the due diligence management system to employees.



DDI-2a - Do relevant employees integrate the due diligence management system into their day-to-day operations?

Auditor Conclusion - Conform

Data Points

Data point 1: Interviews with one employee from warehouse and one from admin confirmed they understand the due diligence management system and integrate it into their day-to-day operations. Data point 2: Site observation demonstrates all materials are assigned with specific lot number and kept in dedicated area.

Supplier Relations

SR-1 - Is there a process in place to conduct Know-Your-Counterparty (KYC) on all suppliers?

Auditor Conclusion - Not applicable

Data Points

No supplier involved in facility's production activities.

SR-1a - Does the process to conduct KYC meet the requirements of standard (i.e. does it ensure identity is established, beneficial ownership is established, reviewed against relevant sanctions list)?

Auditor Conclusion - Not applicable

Data Points

No supplier involved in facility's production activities.

SR-1b - Is the process consistently implemented?

Auditor Conclusion - Not applicable

Data Points

No supplier involved in facility's production activities.

SR-2 - Are the company's expectations that suppliers will undertake mineral supply chain due diligence and risk management consistent with the standards defined in Annex II of the OECD Due Diligence Guidance communicated to suppliers via contracts and/or written agreements?

Auditor Conclusion - Not applicable

Data Points

Written agreement with supplier has not implemented yet as the materials coming from own mine.

SR-2a - Does the company communicate intended consequences if the supplier does not meet those expectations?

Auditor Conclusion - Not applicable

Data Points

The materials were coming from own mine.



SR-3 - Is there a process to determine whether there are any inconsistencies or discrepancies related to KYC of the supplier?

Auditor Conclusion - Not applicable

Data Points

The materials were coming from own mine.

SR-3a - Can you confirm that during the assessment period, there were no inconsistencies or discrepancies related to KYC of the supplier observed?

Auditor Conclusion - Yes

SR-3c - Can you confirm that during the assessment period, no red flags as defined by Annex II of the OECD Due Diligence Guidance related to suppliers were triggered? If yes, please fill out the section on red flags in the overview tab.

Auditor Conclusion - No

SR-4 - Does the company aim to establish long-term relationships with suppliers in order to build responsible sourcing relationships with them?

Auditor Conclusion - Not applicable

Data Points

The materials were coming from own mine.

SR-4a - Note any ways the company has supported or built capacities of suppliers to improve performance and conform to the Auditee's supply chain policy.

Auditor Conclusion - Not Applicable

SR-5 - Does the company aim to avoid cash transactions where possible?

Auditor Conclusion - Conform

Data Points

Data Point 1: Company has a written non-cash transaction policy signed on January 1, 2023 which stated that the company committed to transaction using non-cash system to avoid money laundering crimes. Data Point 2: Facility's Supply Chain Policy stated, the company committed to implement the policies for cashless transactions. Data Point 3: Ms. Karttin (Accounting) provided the payment receipt for tax payment. The provided receipt also includes the bank transfer record. Therefore, it is confirmed that the company has intention to avoid cash transaction.

SR-5a - When cash transactions are unavoidable, are they supported by verifiable evidence?

Auditor Conclusion - Conform

Data Points



Data Point 1: The non-cash transaction policy signed on January 1, 2023 stated, PT. Bangka Prima Tin can do transaction in cash, if the transaction is carried out with a maximum nominal value of IDR 2,000,000. Section 5 stated, in conducting cash transaction must attach a note as proof of the transaction. Data Point 2: Ms. Karttin (Accounting) confirmed of payment less than IDR 2,000,000 may be made in cash but there must be receipt (note) to accompany the payment. Data Point 3: Five receipts for the latest purchasing of supporting production material shown to confirmed payment by cash with evidence.

SR-6 - Where appropriate, does the company support the implementation of the principles and criteria of the Extractive Industry Transparency Initiative (EITI).

Auditor Conclusion - Conform

Data Points

Data Point 1: Company has written policy to support Extractive Industries Transparency Initiative (EITI) issued on January 9, 2023. The policy stated that PT. Bangka Prima Tin support all EITI programs to uphold transparency in extractive industry. Data Point 2: Mr. Andi Kurniawan (General Manager) stated they intended to join EITI program and has emailed them but no reply. The email is shown to auditor.

Internal Material Control

IMC-1 - Are there systems of internal material control in place?

Auditor Conclusion - Conform

Data Points

Data point 1: SOP Divisi Gudang & Admin Gudang, dated July 11, 2021, states Head of Warehouse, Deputy Head of Warehouse, and/or Warehouse Admin must verify incoming materials against delivery record. After it has been verified, the material will be transferred from small bags to jumbo bags for weighing. The, it will be sampled for assay testing. After the result is received, a specific lot number will be assigned and a warehouse receipt (Laporan penerimaan Bijih Timah / LPBT) will be issued. The lot numbering will be based on the source (block A or block B), delivery month (A = January, B = February, C = March, and so on), and sequence of receipt. For example, Lot number AB 001 means the material comes from block A, is delivered in February, and is the first delivery in the month. When the tin ores are about to be sent to production, Head of Production will provides the composition instruction to Warehouse Department, which will in turn fill in the mixing form (Data Mixing). The form will be signed by Production Admin, Head of Warehouse, and Head of Production. Data point 2: During facility walkthrough, there were no tin ores or ingots observed. Nevertheless, jumbo bags that were previously used to hold the tine ores reflect specific lot number, date of receipt, and weight. Data point 3: Interview with one employee from Warehouse confirmed there is a system of internal material controls in place. All incoming materials will be verified against delivery order before being allowed entry. Then, the materials will be weighed and sampled for assay testing. After the result comes out, a specific lot number will be assigned and put on the jumbo bag for identification. The lot number reflects the source (A = block A; B = block B), delivery months (A = January, B = February, and so on) and sequence number. Lot number AK 001, for example, means the material is mined in block A, delivered in November, and the first delivery in the month. Then, a warehouse receipt (LPBT) will be issued). For outgoing materials, Head of Production will provide Warehouse Department with a mixing composition and the mixing form will be signed by Production Admin, Head of Warehouse, and Head of Production. Data point 4: ore delivery record, warehouse receipt, and mixing record of one randomly selected lot number demonstrated there are systems of internal material control align with the procedures.

IMC-1a - Does the system ensure For each incoming transaction, date and weight are calculated.

Auditor Conclusion - Conform

Data Points

Data point 1: Record review of 20 material transactions demonstrated that incoming transactions' date and weight are calculated and recorded. Data point 2: Interviews with one Production Admin and one Warehouse employee confirmed that incoming transactions' date and weight are calculated and recorded. Data point 3: No tin ore was observed during facility walkthrough. Nevertheless, jumbo bags that were previously used to hold the tine ores reflect specific lot number, date of receipt, and weight. Data point 4: One randomly selected incoming material record was reviewed to confirm that, for each incoming transaction, the date and weight are calculated and recorded.



IMC-1b - Does the system ensure Inventory, including work in progress, metal stocks, and other material types, is calculated.

Auditor Conclusion - Conform

Data Points

Data point 1: Inventory list shows the auditee records all materials, including raw material, work in progress, and metal stocks. Data point 2: Interviews with one Warehouse Admin and one Production Admin confirmed that inventory is calculated. Data point 3: Site observation confirmed that inventory is calculated. Data point 4: One randomly selected sample shows that inventory record is calculated.

IMC-1c - Does the system ensure Relevant personnel are trained on the system.

Auditor Conclusion - Conform

Data Points

Data point 1: Interviews with one employee from Production Admin and one from Warehouse confirmed they have been trained on the system. Data point 2: Training record and photos reflect employees from warehouse, production, mining, accounting, administration, and logistics attended a training on implementation RMI-RMAP requirements, including standard operating procedures (SOPs). In the occasion, the SOPs are also distributed to each employee. Data point 3: Interview with Mr. Andi Kurniawan (General Manager) confirmed training on due diligence implementation, including SOPs, were last conducted in July 2023.

IMC-1d - Does the system ensure The system is consistently implemented.

Auditor Conclusion - Conform

Data Points

Data point 1: One randomly sampled ore delivery record and inventory record confirmed no gaps or inconsistencies. Data point 2: interviews with one Warehouse Admin and one Production Admin confirmed no gaps or inconsistencies.

IMC-2 - Is there a process to calculate a mass balance?

Auditor Conclusion - Conform

Data Points

Data point 1: Kebijakan Perhitungan Mass Balance, dated July 1, 2021, states the facility will conduct mass balance calculation when annual production quota set in RKAB (Rencana Kerja dan Anggaran Belanja) has been used up. Data point 2: The provided mass balance calculations for the period of 2022 and 2023 indicate the facility uses CFSi mass balance calculation template. Data point 3: Interviews with one Warehouse Admin and one Production Admin confirm a process to calculate a mass balance.

IMC-2a - Does the process to calculate a mass balance meet the requirements of the standard?

Auditor Conclusion - Conform

Data Points

Data point 1: Mass balance sheet, inventory list, production records, tin ingot delivery records, and sale records confirmed the mass balance includes receipts, inventories, losses, and sales quantities. Data point 2: Record review of the company's mass balance worksheet confirmed the information in the mass balance is accurate. The data reflected in worksheet matches the inventory list, production records, ingot delivery records, and sales records. Data point 3: Interviews with one Warehouse Admin and one Production Admin confirmed the information in the records is accurate. Data point 4: interview with Mr. Andi Kurniawan (General Manager) confirmed personnel are able to demonstrate how records are created.



IMC-2b - How often is the mass balance calculation conducted?

Auditor Conclusion - Conform

Data Points

Data point 1: Kebijakan Perhitungan Mass Balance, dated July 1, 2021, defines frequency for review is yearly. Data point 2: Record review of past mass balance calculations confirmed frequency for review is yearly. Data point 3: Interview with Mr. Andi Kurniawan (General Manager) confirmed frequency for review is yearly.

IMC-2c - Is the mass balance for the assessment period within the acceptable margin of error?

Auditor Conclusion - Conform

Data Points

Data point 1: Margin of error for the mass balance calculation is 5.65%.

IMC-2d - If no, please explain.

Auditor Conclusion - N/A

IMC-2e - Can you confirm that during the assessment period, there were no discrepancies in the mass balance?

Auditor Conclusion - There is no discrepancy related to mass balance.

Transaction Review

TR-1 - Do the requirements for each transaction meet the requirements of the standard (at a minimum include all documents are submitted, no discrepancies are found, and transportation through a CAHRA are considered a red flag)?

Auditor Conclusion - Conform

Data Points

A simple sampling plan was selected. As many as 20 out of 327 transactions were randomly selected to cover all months. Delivery order, warehouse receipt, mining permit, and assay testing record for each transaction were reviewed. All materials are tin ores mined from the facility's own location in Kepulauan Bangka Belitung Province, Indonesia.

TR-2 - Is there a process to determine whether there are any inconsistencies or discrepancies related to the material, origin and/or transportation documentation submitted by the supplier?

Auditor Conclusion - Conform

Data Points



Data point 1: SOP Divisi Gudang & Admin Gudang, dated July 11, 2021, states Head of Warehouse, Deputy Head of Warehouse, and/or Warehouse Admin must verify incoming materials against delivery record. Data point 2: Interview with Mr. Andi Kurniawan (General Manager) confirmed all incoming materials must be accompanied by delivery order. Head of Warehouse, Deputy Head of Warehouse, and/or Warehouse Admin must verify incoming materials against delivery record. Any inconsistencies will have to be reported to him for further investigation. So far, there has been no inconsistency/discrepancy. Data point 3: Interview with one Warehouse Admin confirmed all incoming materials will have to be verified against the delivery order. If there is inconsistency or discrepancy between the incoming materials and the delivery order, it will be reported to Mr. Andi Kurniawan (General Manager). Data point 4: One randomly sampled incoming material record and warehouse receipt confirmed no inconsistencies or discrepancies material, origin, and/or transportation documentation. The delivery record and warehouse receipt indicate the material is from the facility's own mining site. Data point 5: Site observation confirmed does not indicate any inconsistencies or discrepancies related to material, origin, and/or transportation documentation.

TR-2a - Can you confirm that during the assessment period, no discrepancies were identified?

Auditor Conclusion - Yes. No discrepancy was identified.

TR-2b - If no please describe.

Auditor Conclusion - N/A

TR-2c - Can you confirm that during the assessment period, no red flags as defined by Annex II of the OECD Due Diligence Guidance related to materials were triggered? If yes, please fill out the section on red flags in the overview tab.

Auditor Conclusion - No red flag was triggered.

MINING OPERATIONS ONLY (LSM & ASM)

Red Flags

RF-1 - After reasonable due diligence, were any identified flags have been confirmed to be high-risk?

Auditor Conclusion - Conform

Data Points

Data Point 1: Based on internal record review and interview with management team, all materials were coming from own mine that has valid legal permit. The mine, including the smelting process are in Bangka Island of Indonesia which is not a high-risk country. Data Point 2: Mr. Andi Kurniawan (General Manager) confirmed the materials coming from own mine located in Bangka Island of Indonesia. He also visited each mine weekly and monitor the activity from tin ore collected on mines and loaded to the trucks. Data Point 3: Auditor observed company has sufficient capacity and machine to process the material, smelting and refining until become tin ingots. Currently, no production process running since July 2023, because there were no ores to be processed. The last production was in July 2023. There was only slag of 244,038 Kgs on the day of assessment. Auditee was planning to have another production in middle of December 2023.

RF-2 - Describe the due diligence steps and the results.



Auditor Conclusion - Supply Chain Policy published on company website mentioned: the mineral produced (tin), identify the risk as mentioned on Annex II of OECD Guidelines which consisted of: serious abuses associated with the extraction, transport or trade of mineral, direct or indirect support to non-state armed groups, direct or indirect support to public or private security forces, bribery and fraudulent misrepresentation of the origin of mineral, money laundering and non-payment of taxes, fees and royalties to Government; tin ore was coming only from its own mine and they did not source from other suppliers, this will ensure strict control from mine to final products; PT Bangka Prima Tin committed to the responsible sourcing of minerals throughout its supply chain and continuing to conform with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and regulations surrounding "conflict minerals". As the policy clearly mentioned that the procurement of tin ores comes from own mine located in Bangka Island of Indonesia, management assess the risk whether Indonesia considered CAHRA and based on their assessment, Indonesia is considered as low risk area. As the mine belongs to company, management was able to monitor daily activity at the mine, monitor the loading activity (tin ore from mine loaded to the trucks), checking material received in smelter warehouse, weighed, and marked with lot number. Sample of material then was selected to be tested on laboratory. The approved material enters the furnace to be smelted and refined. Each step has marking and recorded for traceability purposes. Government surveyor inspected the final products (tin ingots) and take sample to be tested on their laboratory. Once accepted, tin ingots are sealed and ready for export.

Step 5 Report

S5-1 - Does the company have a report, either stand-alone or integrated into an annual sustainability or corporate responsibility report that provides information on supply chain due diligence?

Auditor Conclusion - Conform

Data Points

Data point 1: Auditor reviewed the auditee's RMI-RMAP Public Due Diligence Report (<https://bangkaprimatin.id>), dated January 9, 2023.

S5-1a - Does the report meet the requirements of the standard (i.e. at a minimum, describe the company's management systems, methodology and results of the risk assessment, and the steps taken to manage risks)?

Auditor Conclusion - Conform

Data Points

The company uses Step-5 Report template available in RMI website. The report includes information on period of review of the last RMI-RMAP audit, the company conducting the last audit, link to the report summary, link to supply chain policy, identification of departments that may be exposed to supply chain risk, internal material control system, grievance mechanism, and KYC process and its results.

S5-1b - Is the report documented and published?

Auditor Conclusion - Conform

Data Points

Data point 1: The auditee's public report is available at the auditee's website (<https://bangkaprimatin.id>)

S5-1c - Please provide the link.

Auditor Conclusion - <https://bangkaprimatin.id>

Continual Improvement

CIM-1 - Please note any continual improvement activities in which the company has been engaged since the last assessment:

The information in this report is subject to the RMI auditee and auditor agreements. The content is final and not to be amended.



Auditor Conclusion - The auditee has conducted management system review and trainings for relevant employee since the last assessment. They have also been trying to understand what is expected from them in term of implementation of EITI principles by contacting EITI Indonesia and looking for further information in EITI Indonesia website.

CIM-1a - Design of due diligence management system

Auditor Conclusion - The auditee's due diligence management system is built around the legal requirements, with modifications in an attempt to be in line with RMI-RMAP requirements. Their supply chain policy, CAHRAs procedure, grievance mechanism, management system review, suppliers relations, and Step-5 report are examples of their attempt to meet RMI-RMAP.

CIM-1b - Implementation of due diligence management system

Auditor Conclusion - The auditee has appointed Mr. Andi Kurniawan (General Manager) to be responsible for the implementation of their due diligence management system. In doing so, he is assisted by Ms. Celine Levin (RMAP Secretary). Based on organization structure, he is the highest rank personnel onsite after the Director.

High Risk Questions

Risk Mitigation

Upstream Assurance Mechanisms

Step 5 Report

High Risk Sourcing ***Note: Completion of all high-risk questions is required even if the auditee utilizes an Upstream Assurance Mechanism.

HRS-0 - Based on Auditor determination, are the High-Risk Questions applicable for this Assessment

Auditor Conclusion - No

Auditor Conclusions

Overall Conclusions

AC-1 - Are sufficient resources made available to support the effective implementation of the due diligence management system?

Auditor Conclusion - Conform

Data Points

The auditee has a simple operation and is processing tin ore materials coming from own mine. The auditee's General Manager is responsible for the implementation of their due diligence management system. He has been in tin industry for 20 years and completed RMI Management System module in eLearning.



AC-2 - Does the due diligence management system assess whether the origin of minerals, the locations of mineral sourcing or transit or the nature of suppliers within the supply chain may trigger 'red flags' as defined by their policy and the relevant Supplement of the Guidance?

Auditor Conclusion - Conform

Data Points

The auditee processes tin ores coming from their own mining site. All materials are from mining sites located in the same province as the auditee's smelting/refining location.

AC-3 - Does the due diligence management system ensure improved due diligence and risk management performance over time?

Auditor Conclusion - Conform

Data Points

The auditee developed their due diligence management system based on their attempt to meet legal requirements, with modifications to meet RMI-RMAP expectations. They have communicated their grievance mechanism to internal and external parties if they have in the future, and will take the result, if any, to the next management system review meeting. The auditee has conducted a management system review in 2023 and expressed their commitment to do so on annual basis.

AC-4 - Is the due diligence management system appropriate for the level of the identified risks and impacts and complexity of the supply chain?

Auditor Conclusion - Conform

Data Points

The auditee has a small and simple operations. They processes tin ores coming from their own mining site located in the same province as the auditee. Their due diligence management system is mainly aimed to comply with legal requirements and with adjustments to meet RMI-RMAP expectations.

AC-5 - Is the due diligence management system based on good faith and reasonable efforts in conducting due diligence?

Auditor Conclusion - Conform

Data Points

The auditee's due diligence management system is be based on a good faith and reasonable efforts. The system is built to ensure all materials are from legal sources and traceable.

AC-6 - Describe the sampling methodology applied

Auditor Conclusion - A simple sampling plan was selected. As many as 20 out of 327 transactions were randomly selected to cover all all months. Delivery order, warehouse receipt, mining permit, and assay testing record for each transaction were reviewed. All materials are tin ores mined from the faility's own location in Kepulauan Bangka Belitung Province, Indonesia.

AC-7 - Company Context



Auditor Conclusion - PT Bangka Prima Tin was established in 2008 at Jl. Raya Pangkol, Kabupaten Bangka Tengah, Bangka Belitung Province, Indonesia. They experienced a change in ownership in 2018 and change in management team in June 2022. Since the change of management, the facility has gone through one RMI-RMAP assessment before the current one. The facility processes tin ores coming from their own mining site located in Kelambui Sea, Kabupaten Bangka Selatan, Kepulauan Bangka Belitung Province, covering an area of 498.6 hectares. Their mining permit (IUP No. 188.45/245.C/DPE/2013) was issued on November 8, 2013, and is valid for 20 years. To exploit the tin ores, the facility is using two suction dredgers of their own. The wet ores will then be delivered to a temporary warehouse in Bangka Selatan for drying before being transported to the facility's smelting location. All ores are then processed into tin ingots with a purity level of at least 99.9%. Currently, the facility employs 65 workers at smelting site and 15 workers at the suction dredgers.

AC-8 - Opening Meeting

Auditor Conclusion - An opening meeting was conducted with Mr. Andi Kurniawan (General Manager), Ms. Celine Levin (RMI-RMAP Secretary), Mr. Hery Kurniawan (Marketing), Ms. Dwi Susilawati (Human Resources), Ms. Kartini (Accounting), Ms. Yusra Damayanti (Production Admin), and their team on November 27, 2023. RMI opening meeting slides were discussed with all meeting participants. UL Statement of Integrity and RBA & RMI COVID-19 Pre-Assessment Checklist were also presented and explained. Andi Kurniawan (General Manager) signed the two documents and granted full access for the assessment immediately.

AC-9 - Closing Meeting

Auditor Conclusion - A closing meeting was conducted with Mr. Andi Kurniawan (General Manager), Ms. Celine Levin (RMI-RMAP Secretary), Mr. Hery Kurniawan (Marketing), Ms. Dwi Susilawati (Human Resources), Ms. Kartini (Accounting), Ms. Yusra Damayanti (Production Admin), and their team on November 27, 2023. No preliminary findings addressed as there were no finding and RMI-RMAP Closing Meeting PowerPoint were presented and explained to the meeting participants. It was explained that evidences collected during the assessment based on sampling and the full report will be uploaded to RMI-RMAP platform for further review by RMI-RMAP. No objection was raised by the company's representatives. Mr. Andi Kurniawan (General manager) signed Assessment Preliminary Findings Acknowledgment of Receipt on behalf of the company to confirm all findings have been discussed. A copy of the signed Assessment Preliminary Findings Acknowledgment of Receipt and a copy of RMI-RMAP Closing Meeting PowerPoint were left with the company.

AC-10 - Strengths

Auditor Conclusion - The auditee shows eagerness and willingness to learn. They have also assigned a dedicated person to assist the General Manager in the implementation of due diligence management system.

AC-11 - Continual Improvement

Auditor Conclusion - The auditee has established their management system based on their attempt to meet legal requirements and made modifications based on their understanding of RMI-RMAP requirements and results of previous RMI-RMAP audit. Their supply chain policy, CAHRAs procedure, grievance mechanism, management system review, suppliers' relations, and Step-5 report are examples of their attempt to meet RMI-RMAP expectations. The auditee has conducted management system review and training for relevant employee since the last assessment. They have also understood what is expected from them in term of implementation of EITI principles by contacting EITI Indonesia and looking for further information in EITI Indonesia website.

AC-12 - Further Comments

Auditor Conclusion - None