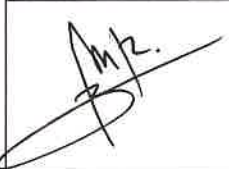








**MERDEKA  
BATTERY**  
MATERIALS

# PT MERDEKA BATTERY MATERIALS Tbk

## **POLICY SPEAKING UP MBM-POL-IR-10-00**

PREPARED	CHECKED		APPROVED	
				
<b>Chairul Reza Faisal</b>	<b>Yanthi Sepriana Siagian</b>	<b>Muhammad Regen Pohan</b>	<b>Titien Supeno</b>	<b>Devin Antonio</b>
<b>IR Superintendent</b>	<b>HR Compliance Supervisor</b>	<b>IR Manager</b>	<b>HR Director</b>	<b>President Director</b>
<b>01 December 2023</b>	<b>01 December 2023</b>	<b>01 December 2023</b>	<b>01 December 2023</b>	<b>01 December 2023</b>

### Head Office:

Treasury Tower 69<sup>th</sup> Floor District 8 SCBD Lot. 28,  
Jl. Jend. Sudirman Kav. 52-53, Senayan, Kebayoran Baru,  
Kota Adm. Jakarta Selatan, DKI Jakarta - 12190

Phone : (+62-21) 3952 5581

Fax : (+62-21) 3952 5582

Website : [www.merdekabattery.com](http://www.merdekabattery.com)

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**DOCUMENT CHANGE STATUS**

Revision Number	Division/Department	Reason of Change	Revision By	Revision Date

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## 1. GENERAL

Policy regarding Speaking Up is developed, implemented, and managed for the benefit of PT Merdeka Battery Materials Tbk and its subsidiaries to ensure that the Board of Directors or Employee can submit questions and/or report violations/alleged violations. Suppose, in the course of implementation, non-conformities are found that are not covered in their document and are considered essential for one reason or another. In that case, the non-conformities will be further reviewed, and if they are to continue to be applied, they will be made into an addendum to their policy.

And suppose there is a difference in interpretation between their policy's Indonesian and English versions. In that case, the Indonesian version is the prevailing version. It will be used, and in the event of a request for discretion on implementing their policy, it must obtain prior approval from the President Director.

## 2. PURPOSE

The purpose of this policy is as a guideline so that each Board of Directors or Employee can submit questions and/or report violations/alleged violations in good faith and in accordance with established procedures. This policy also explains that the reporter for a violation/alleged violation is guaranteed to be no retaliation for the report submitted. In addition, this policy is also expected to build a culture of openness, accountability, and integrity in the Company.

## 3. SCOPE

This policy applies to all Employee at PT Merdeka Battery Materials Tbk and its subsidiaries.


## 4. RESPONSIBILITY

### 4.1 Top Management

The Top Management must approve and sign all quality management system documents including Company Policies, Procedures, Work Instructions, Forms, and other documents.

### 4.2 Management Representative

The HR department must cooperate with other departments to prepare and revise all documents including Company Policies, Procedures, Work Instructions, Forms, and other documents.

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#### 4.3 Head of Department or Department Manager

The Department Head or Department Manager must review the relevant documented information, and ensure that subordinate staff is aware of any changes or updates or updates to the document.

## 5. POLICY

### 5.1 Definition


1. The Company is PT Merdeka Battery Materials Tbk or its subsidiaries.
2. Directors are Directors of PT Merdeka Battery Materials Tbk or its subsidiaries.
3. Employee is a person who works at PT Merdeka Battery Materials Tbk or its subsidiaries.

### 5.2 General Standards

1. Each Board of Directors and Employee has the responsibility to ask questions and report violations/alleged violations in good faith and use the communication channels provided.
2. Whistleblowers who are found to have submitted violations/alleged violations without good faith may be subject to sanctions.
3. Known violations/alleged violations must be reported without any attempt to investigate or resolve the issue themselves and the recipient of the report must take remedial action under the supervision or knowledge of a higher supervisor or applicable procedures.
4. Every report of violation/alleged violation and questions will be answered/handled confidentially, impartially, professionally, objectively, neutrally, and carefully to find the root of the problem and the resolution policy.
5. During the reporting and follow-up process, the whistleblower is not allowed to communicate with external parties about the reported problem, except with those appointed by the Merdeka Group. Every Merdeka Personnel is responsible for confidentiality to the Merdeka Group.

### 5.3 Whistleblower Protection

1. No Retaliation
  - a. Retaliation in the form of dismissal, demotion, suspension, harassment, or other forms of discrimination will not be tolerated if inquiries and/or reports of violations/alleged violations are submitted in good faith;
  - b. There is no special action if the violation/alleged violation is not proven;
  - c. If some parties or individuals retaliate against others, they will be subject to disciplinary action.

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## 2. Confidentiality

- a. Any reported issues will be processed and handled in a confidential, impartial, professional, objective, neutral, and prudent manner;
- b. Every submission of questions and reporting of violations/alleged violations will be kept confidential by the whistleblower's request. The whistleblower has the right and the choice to reveal his/her identity or remain anonymous; however, in some cases, there are limits to what can be accomplished: a reasonable investigation can be difficult if the information provided cannot be tested or verified and the investigator cannot obtain further information from the whistleblower;
- c. For severe problems (eg potentially involving legal process), the Company has a decision that cannot be contested by the whistleblower in the settlement.

## 3. Anonymity


- a. Submitting questions and reporting violations/alleged violations anonymously as far as possible will be processed using existing information, but it is possible if it is needed for confirmation with related sources;
- b. Any violations/alleged violations that are reported anonymously will be more challenging to investigate and resolve; therefore, it is recommended to provide the identity of the whistleblower as much as possible.

### 5.4 Scope of Reporting

1. Violation of internal regulations or laws, including the Company's Code of Conduct, Company Policies or regulations, or laws that apply externally.
2. Acts of fraud, namely dishonest acts which include, among others, fraud, forgery, theft, or embezzlement.
3. Unethical behavior, namely acts or actions that cannot be ethically justified, such as violating the Company's Code of Conduct and deceiving customers.
4. Conflict of interest, namely a situation where the Company's Employee have or are reasonably suspected of having a personal interest in any use of authority in their position or position.
5. Health and safety of the work environment, including harassment, intimidation, discrimination, work safety, and drug use.

### 5.5 Reporting Mechanism

1. Each Board of Directors and Employee who suspects or see or knows of a violation/alleged violation may submit through the channels that are part of the violation reporting system as follows:
  - a. Website : <https://mcg.whispli.com/SpeakUp>

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- b. Phone Number : 0812 5000 1018
- c. WhatsApp : 0812 5000 1018
- 2. Reports of every violation/alleged violation are received and managed by a Third Party (Consultant) to be forwarded, handled, and followed up by the department that the Company has determined.

**5.6 Report Handling Mechanism**

1. The Consultant will confirm receipt of the report and conduct an initial assessment of the report no later than 1 x 24 hours (at this stage the Consultant may also contact the whistleblower to request additional information to support reporting).
2. The consultant will submit all reports to the Head of Internal Audit and the Head of Industrial Relations of the Company unless the reported parties are:
  - a. Head of Internal Audit or Head of Industrial Relations of the Company, the report will only be submitted to the HR Director;
  - b. HR Director, the report will only be submitted to the President Director;
  - c. President Director, the report will only be submitted to the Audit Committee.
3. Reports received will be forwarded to the relevant Party for follow-up.
4. Each recipient of the report will reconfirm receipt of the report from the Consultant no later than 2 x 24 (twenty-four) hours and be responsible for following up on the handling of the report, for example, the appointment of teams both internal and external parties to conduct reviews, investigations, etc. To expedite the follow-up process, the party responsible for the follow-up reporting may request additional information (if needed) from the whistleblower through the Consultant.
5. If required, the Consultant will make at least two follow-up attempts to request additional information and/or evidence from the whistleblower, and there is a time limit of 15 working days from the date of the request in responding to the request to the Consultant.

**5.7 Closing of the Report and Application of Discipline**

1. The report may be closed for one of the following reasons:
  - a. The responsible party has carried out the follow-up process;
  - b. There is not enough basis and/or information for reports; and
  - c. There is no response from the whistleblower to the request for additional information and/or evidence from the Consultant within 15 working days from the date of the request.

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2. Any party who has been proven to have committed a violation will be subject to sanctions by the applicable rules and regulations. The level of sanctions that will be considered:
  - a. Employment agreement;
  - b. Company Regulations or Collective Agreement; and
  - c. The applicable laws and regulations.