






PT MERDEKA BATTERY MATERIALS TBK

HUMAN RIGHTS POLICY

MBM-SUS-POL-014

Rev.	Prepared By: Sustainability Manager	Reviewed and Approved By: Sustainability	Approved By: Vice President Director	Approved By: President Director
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	PT Merdeka Battery Materials Tbk Human Rights Policy	Document No.: Revision: Department: Effective Date: Page No.:	MBM-SUS-POL-014 1.0 Sustainability 18 December 2023 2 of 5
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I. INTRODUCTION

PT Merdeka Battery Materials Tbk (“MBM” or the “Company”) respects the human rights of all individuals, including the communities where we operate, our workforce, and others affected by our business activities.


MBM’s Human Rights Policy outlines our commitment to respect human rights and the elements of our approach to realizing the commitment, guided by the United Nations Guiding Principles on Business and Human Rights.

II. SCOPE

This policy is applicable to the management and employees of PT Merdeka Battery Materials Tbk and Subsidiaries under its operational control (hereinafter referred to as “MBM”) and its business partners, including contractors and suppliers. We will work together and encourage our joint ventures and business partners, that are not within our operational control, to align their practices with this policy.

III. OUR COMMITMENT

1. We are committed to respecting internationally recognized human rights, including, but not limited to, those set out in the International Bill of Human Rights (which consists of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the principles concerning fundamental rights in the eight ILO core conventions as outlined in the Declaration on Fundamental Principles and Rights at Work.
2. We acknowledge and respect the rights of individuals belonging to groups or populations which may be particularly vulnerable to adverse impacts, including indigenous people, women, religious and ethnic minorities, children, and people with disabilities. We are committed to applying principles of equal opportunity and non-discrimination in every interaction with these groups and our other stakeholders.
3. We respect the rights of our workers and the workers of our suppliers, including but not limited to, a safe and healthy working environment, freedom of assembly and association, and collective bargaining.
4. We have a zero-tolerance policy towards forced labor, child labor, and human trafficking throughout our operations and supply chain.
5. We are committed to fostering a diverse and inclusive working environment free from discriminatory practices.
6. We require our suppliers to share our commitment to respecting the rights of employees, and communities where we operate.
7. We avoid conflict and violence with communities and other stakeholders in all our operations. We ensure that our supply chains are free from conflict and do not contribute to violence or human rights violations.
8. We respect the rights of communities impacted by our operations, including, but not limited to, their access to water and the right to a healthy environment.

	PT Merdeka Battery Materials Tbk Human Rights Policy	Document No.: Revision: Department: Effective Date: Page No.:	MBM-SUS-POL-014 1.0 Sustainability 18 December 2023 3 of 5
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9. We are committed to providing and cooperating in the remediation of human rights impacts that we may cause or contribute to.
10. We are committed to establishing effective grievance mechanisms for our workers, the workers of the Company's partners, and communities whose rights might have been affected by our operations, including through our whistleblowing system.

IV. OUR APPROACH TO REALIZE OUR COMMITMENT

1. General

Our commitment to human rights is embedded in our Code of Conduct, policies, guidelines, and management processes. We continue to evaluate and review ways to strengthen our approach.

2. Responsibility and Oversight

The Sustainability Department is responsible for coordinating the programs related to the Human Rights Policy ("Policy") conducted at the head office and MBM's sites. The performance of Policy implementation is overseen by MBM's Sustainability Committee, which reports to the Board of Directors regularly.

3. Training and Reporting

We communicate this Policy and its requirements to our internal and external stakeholders, including through our Code of Conduct training and specific training on human rights-related issues. We regularly report the implementation of this policy in a number of relevant disclosures, including our sustainability report.


4. Human Rights Due Diligence

We conduct ongoing human rights due diligence in accordance with the United Nations Guiding Principles for Business and Human Rights. This due diligence involves identifying and assessing our risks and impacts on human rights, integrating the findings from the identification and assessments into relevant internal functions and processes, taking appropriate action, tracking the effectiveness of our responses, and communicating how we addressed the impacts.

We inform and engage with the affected and potentially affected stakeholders on risks, impacts, and management measures and keep them involved in monitoring performance. We will make particular efforts to ensure that we engage with those most vulnerable, in particular where they encounter challenges in expressing their opinions or having them heard, and to identify any additional specific measures to avoid, prevent or mitigate impacts on them.

5. Supply Chain

We require our suppliers and contractors to treat their employees and to interact with communities in a manner that respects human rights and is aligns with this policy. Our suppliers and contractors must adhere to all applicable domestic laws and encourage them to be consistent with ILO core labor principles. We also engage with our key suppliers and contractors to reinforce awareness of potential human rights issues. We have established and implemented appropriate procedures to evaluate and select suppliers and contractors based on criteria outlined in our Sustainability Supplier Code of Conduct which includes respect for human rights.

	PT Merdeka Battery Materials Tbk Human Rights Policy	Document No.: Revision: Department: Effective Date: Page No.:	MBM-SUS-POL-014 1.0 Sustainability 18 December 2023 4 of 5
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6. Security and Human Rights

We implement appropriate security measures to protect our employees, facilities, and assets. However, we ensure that our security measures consistently align with the principle of respect for human rights and do not infringe upon the rights of individuals. In line with this commitment, we conduct human rights assessments in engagement with public and private security providers, adhering to the Voluntary Principles on Security and Human Rights (VPSHR).

7. Remediation and Grievance Mechanism


We establish and consistently maintain operational-level grievance mechanisms. Our workers, the workers of the Company's partners, and local communities can submit complaints related to human rights violations through our whistleblowing system (WBS).

The WBS can be accessed through the website <https://mcg.whispli.com/SpeakUp> or via WhatsApp at 0812-5000-1018 which is managed by an independent third party. We are committed to enabling the remediation of any adverse human rights impacts that may be caused by our business activities.

V. REFERENCES

The development of this policy is guided by the following documents:

1. Universal Declaration of Human Rights.
2. International Covenant - Economic, Social, and Cultural.
3. International Covenant - Civil and Political Rights.
4. International Labor Organization's (ILO) - Eight core labor standards.
5. Law of Indonesia No. 39 of 1999 - Concerning Human Rights.
6. United Nations Guiding Principles - Business and Human Rights.
7. Voluntary Principles on Security and Human Rights.
8. United Nations Global Compact Principles.
9. MBM's Code of Conduct.
10. MBM-SCM-COC-001 - Supplier Sustainability Code of Conduct, PT Merdeka Battery Materials Tbk.
11. MBM-SUS-POL-003 - Sustainability Policy, PT Merdeka Battery Materials Tbk.

	PT Merdeka Battery Materials Tbk Human Rights Policy	Document No.: Revision: Department: Effective Date: Page No.:	MBM-SUS-POL-014 1.0 Sustainability 18 December 2023 5 of 5
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REVISION HISTORY

Revision	Date	Description
1.0	18/12/2023	First Issue for Implementation