

LBMA Responsible Gold Guidance – Version 7

Summary Assessment Report

Based on ISO19011:2011

ASSESSMENT INFORMATION	
Refiner Name:	PT Aneka Tambang Tbk. – UBPP Logam Mulia
Refiner Location:	Jl. Pemuda – Jl. Raya Bekasi Km. 18, Pulogadung, Jakarta Timur 13010, Indonesia
Refiner Contact Person: Name, Title: Email: Phone:	Mr. Yudi Hermansyah; Trading and Services Manager yudi.hermansyah@antam.com +62-21-475 7108
Assessment period:	01.11.2018 - 01.11.2019
Lead auditor and audit team members	Abdul Manan Aruli Satria Wira Nayoan
Dates and places where the onsite assessment activities were conducted	9, 10 & 11-12-2019 Jl. Pemuda – Jl. Raya Bekasi Km. 18, Pulogadung, Jakarta Timur 13010, Indonesia

Assessment scope:	
<i>Refiner location(s) included in the assessment scope</i>	Jl. Pemuda – Jl. Raya Bekasi Km. 18, Pulogadung, Jakarta Timur 13010, Indonesia
<i>Assessment Period</i>	01.11.2018 - 01.11.2019
Assessment methodology:	
<p>Assessment was taken at PT Aneka Tambang Tbk. – UBPP Logam Mulia. Each sections/area relevant for LBMA Responsible Gold Guidance was audited and verified by documentation review and management/employee interviews including the verification on production and refining facilities, raw material warehouse, finished goods warehouse and transaction area by observation during the facility tour. The scope of the assessment cover for Refiner's systems, policies, procedures, processes and activities.</p> <p><i>The evidence of compliance that was reviewed included:</i></p> <ul style="list-style-type: none"> • <i>The following areas of the facility were visited during the tour:</i> <ul style="list-style-type: none"> ○ <i>Melting Process</i> ○ <i>Refining Process</i> ○ <i>Quality Control Process</i> ○ <i>Finished Goods (Kluis) Process</i> ○ <i>Marketing/Trading process</i> • <i>The following interviews were conducted with management:</i> <ul style="list-style-type: none"> ○ <i>Mr. Andik Yudianto (Vice President, Operation)</i> ○ <i>Mrs. Dewi Marpaung (Vice President, Finance, Human Capital & General Affair)</i> ○ <i>Mr. Yudi Hermansyah (Trading and Services Manager)</i> ○ <i>Mr. Betri Eryo Pratama (Product Development Manager)</i> ○ <i>Mr. Abdul Muluk (Retail and Digital Trading Manager)</i> • <i>The following interviews with employees were conducted:</i> <ul style="list-style-type: none"> ○ <i>Mrs. Nur Prahesthi Waluyo (Trading Assist. Manager)</i> ○ <i>Mr. Risqon (Refining Services Trading Assist. Manager)</i> 	

- *Mr. Fakhri Reza (Refining Services Trading Senior Officer)*
- *Mr. Ibnu Hasan (Refining Services and Laboratory Senior Officer)*
- *Mr. Ilham Sadikin (Trading Analyst Senior Officer)*
- *Mrs. lid Misdawati (System, Risk and Procedure Specialist)*
- *Mr. M. Ramzi (Business and Development Specialist)*
- *Mrs. Marly Ancelina Pandin (MR Coordinator Specialist)*
- *Mrs. Nursyahrini Dewi (Market Analyst Junior Specialist)*
- *Mr. I Putu Darmawan (Refining Services Trading Assist. Manager)*
- *Mr. Robbi Tejamukti Kusuma (LM Business Unit, Legal & Compliance Junior Specialist)*
- *Ms. Nuning Waahyuningtyas (Retail Manager)*
- *Mr. Gandang Sukrisno (Quality Control Supervisor)*
- *Mr. Arief Nugroho (Laboran)*
- *Mr. Djarot Setiadi (Kluis/ Warehouse Senior Administrator)*

Any significant or inherent limitations or areas not covered that were within the assessment scope:

All areas within the assessment scope relevant for LBMA Responsible Gold Guidance are assessed.

Assessment criteria:

- a) The assessment team performed the LBMA Responsible Gold Guidance assessment refer to planned arrangements for the relevant management standards, legal and contractual requirements and other requirements to which the Refiner is committed.*
- b) The assessment team took into account all relevant objective evidence provided by the Refiner. Relevant evidence was either qualitative or quantitative in as far as it is appropriate and sufficient to support the assessment team's conclusions. Appropriate evidence is evidence that is relevant and reliable. Sufficient evidence refers to the amount of evidence provided to allow the assessment team to reach a conclusion.*
- c) Any actual or potential gaps in the Refiner's systems in regards to the LBMA requirements are rated in accordance to the level of risk each presents to the credibility and integrity of the LBMA Responsible Gold Programme for the responsible sourcing of gold-bearing materials.*
- d) The assessment team present and explain all nonconformities found within assessment period to Senior Management and staffs during closing meeting. Senior Management accepts all NCs and commits to follow up.*
- e) The assessment team identify improvement that had been done by refiner such as:*
- f) Achieved the sales target of 32 ton gold*
- g) Conducted training for LBMA Gold Responsible Gold Guidance, version 8, on 31 July 2019*
- h) Award winner category of The Most Promising Company International SOE in BUMN Marketeers award 2019, from Mark Plus Inc.*
- i) Award winner category of Precious Metals Product & Business in Indonesia Most Innovative Business Award 2019, from Warta Ekonomi.*
- j) New machinery of High Speed Gold Electro Refining for increasing recovery and production capacity since July 2019*
- k) New machinery of Induction Furnace for increasing production capacity since July 2019*
- l) Adding 1 line of Electrorefining equipment since December 2018*
- m) Successfully processed and refined dore and unprocessed more 100%*
- n) First phase of expansion and development of refinery and manufacturing modernization*
- o) 1st winner of SWA Indonesia Original Brand in Precious Metals Category 2019*
- p) New Product launching of Antam Gift Series on April 2019*
- q) New Product launching of Antam Bezel Series on November 2019*
- r) Silver winner of Sustainable Development Goals Award on September 2109*

Assessment findings:				
<i>Category/subcategory</i>	<i>Non-compliance/Observation: Include evidence found to substantiate the non-compliance as well as frequency of its occurrence.</i>	<i>Recommended corrective action</i>	<i>Timeframe for implementing corrective actions</i>	<i>Refiner comments</i>
Step 1.3	<p><u>Observation:</u></p> <p>Recommended to revise SOP/ Procedure of Due Diligence with adding the statement that gold seller must undersign the statement which is recycled gold to be sold should comply with the LBMA Gold Guidance.</p>	Soon as possible since this is used for daily transaction	Already done with revision of SOP Gold Supply Chain Due Diligence, SPO-LBMA-03, rev.3, 11 December 2019	
Step 1.3	<p><u>Observation:</u></p> <p>We recommend to add rules of the transaction when the contract has expired/ is in the renewal period of the contract.</p>	Soon as possible since this is used for daily transaction	Already done with revision of SOP Gold Supply Chain Due Diligence, SPO-LBMA-03, rev.3, 11 December 2019	
Step 2.2	<p><u>Observation:</u></p> <p>Due diligence should be conducted before the appointment letter from management has been issued for example PT SRAM Bullion Mining Export, since found some of information from risk assessment are still not completed yet including KITAS/stay permit data of one of the owners is no longer valid on 21-02-2019.</p>	Soon as possible	Will be done before end of the year 2019	

ASSESSMENT CONCLUSIONS

CATEGORY	Compliant	Non compliance – risk level			
		Low	Medium	High	Zero Tolerance
Step 1: Establish strong company management systems	5	0	0	0	0
Step 2: Identify and assess risk in the supply chain	3	0	0	0	0
Step 3: Design and implement a management strategy to respond to identified risks	2	0	0	0	0
Step 4: Arrange for an independent third-party audit of the supply chain due diligence	1	0	0	0	0
Step 5: Report on supply chain due diligence	1	0	0	0	0

	Compliant	Non Compliance – risk level			
		Low	Medium	High	Zero Tolerance
Based on the above assessment conclusions, the overall rating of the Refiner's performance is determined to represent:	12	0	0	0	0

The Auditors confirm that:

- ✓ The information provided by the Refiner is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- ✓ The findings are based on verified Objective Evidence relevant to the time period for the assessment, traceable and unambiguous.
- ✓ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
- ✓ The Auditor(s) are properly qualified to carry out the assessment at this Refiner's facility.

Lead Auditor: Abdul Manan Aruli

Signature:



Date: 2019-12-12

The corrective action measures including the evidences on corrective action taken had been reviewed and verified by Auditor with result accepted.



Abdul Manan Aruli, 12 December 2019