



MERDEKA
COPPER GOLD

Advancing Sustainable Long-Term Value

**Meningkatkan Nilai Jangka Panjang
yang Berkelanjutan**



MERDEKA
COPPER GOLD

PT Merdeka Copper Gold Tbk
Treasury Tower 67th-68th Floor
District 8 SCBD Lot. 28
Jalan Jenderal Sudirman Kav. 52-53
Jakarta Selatan - 12190, Indonesia
Telp : +62 21 39525580
Fax : +62 21 39525589

2025 Sustainability Report
Laporan Keberlanjutan

Daftar Isi

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▲ Employee at SCM

Sambutan Presiden Direktur President Director's Message [A.1][D.1][2-22]



Albert Saputro
Presiden Direktur
President Director

Para Pemangku Kepentingan yang Terhormat,

Kami dengan bangga mempersembahkan Laporan Keberlanjutan 2025 PT Merdeka Copper Gold Tbk (Merdeka), yang menegaskan komitmen kami terhadap praktik pertambangan yang bertanggung jawab, transparan, dan berkelanjutan. Laporan ini memberikan gambaran umum tentang kemajuan tahunan kami di seluruh Enam Pilar Strategi Keberlanjutan Merdeka, dengan menyoroti prioritas strategis serta area fokus utama kami untuk perbaikan berkelanjutan.

Di Merdeka, keberlanjutan bukan hanya merupakan prinsip panduan, tetapi juga menjadi komponen inti dari strategi jangka panjang kami. Hal ini membentuk cara kami beroperasi, mengambil keputusan, dan berinteraksi dengan para pemangku kepentingan, sehingga memungkinkan kami untuk menghadirkan pertumbuhan ekonomi yang berkelanjutan sekaligus menciptakan dampak sosial yang positif serta menjaga kelestarian lingkungan di seluruh wilayah operasional kami.

Pada tahun 2025, kami memperkuat integrasi keberlanjutan di seluruh lini bisnis dan semakin meningkatkan kualitas serta transparansi pelaporan kami. Upaya ini diakui melalui perolehan peringkat Platinum pertama kami pada Asia Sustainability Reporting Rating (ASRRAT) 2025, yang menegaskan komitmen kami untuk selaras dengan praktik terbaik global dalam pelaporan keberlanjutan serta memperkuat dedikasi kami terhadap perbaikan berkelanjutan.

Distinguished Stakeholders,

We proudly present the 2025 Sustainability Report of PT Merdeka Copper Gold Tbk (Merdeka), which reaffirms our commitment to responsible, transparent, and sustainable mining practices. This report provides an overview of our annual progress across Merdeka's Six Sustainability Strategy Pillars, highlighting our strategic priorities and key focus areas for continuous improvement.

At Merdeka, sustainability is not only a guiding principle but also a core component of our long-term strategy. It shapes how we operate, make decisions, and engage with stakeholders, enabling us to deliver sustainable economic growth while generating positive social impact and safeguarding the environment across our areas of operation.

In 2025, we strengthened the integration of sustainability across our business and further improved the quality and transparency of our reporting. These efforts were recognized with our first Platinum rating at the Asia Sustainability Reporting Rating (ASRRAT) 2025, underscoring our commitment to aligning with global best practices in sustainability reporting and reinforcing our dedication to continuous improvement.

Memperkuat Fondasi dan Mendorong Pertumbuhan Strategis

Tahun 2025 menjadi periode penting bagi Merdeka seiring dengan penguatan fondasi operasional melalui peningkatan skala operasi serta kemajuan proyek-proyek strategis kami. Tambang Emas Tujuh Bukit terus menunjukkan kinerja produksi yang konsisten, sementara PT Merdeka Gold Resources Tbk (MGR), anak perusahaan kami, memulai kegiatan penambangan pada Oktober 2025, diikuti dengan produksi emas perdana pada Februari 2026 serta penjualan emas awal ke fasilitas pemurnian pada Maret 2026.

Pada lini usaha nikel, PT Merdeka Battery Materials Tbk (MBM) memperkuat kinerja operasionalnya dan meningkatkan kapasitas produksi. Hal ini mencakup peningkatan kapasitas dan efisiensi operasional di Tambang Sulawesi Cahaya Mineral (SCM), produksi yang stabil serta pasokan bijih ke smelter *Rotary Kiln Electric Furnace* (RKEF), serta kemajuan signifikan dalam proyek hilirisasi, termasuk nikel matte converter, fasilitas *Acid Iron Metal* (AIM), dan proyek *High-Pressure Acid Leach* (HPAL), yang mulai menunjukkan hasil komersial melalui penjualan *mixed hydroxide precipitate* (MHP) kami.

Lingkungan

Pada tahun 2025, Merdeka mencatat kinerja lingkungan yang kuat, ditandai dengan keberhasilan seluruh (100%) entitas anak dalam memperoleh sertifikasi ISO 14001:2015, yang menegaskan komitmen perusahaan terhadap praktik pertambangan yang bertanggung jawab dan berkelanjutan.

Seluruh operasi Merdeka telah memperoleh perizinan lingkungan yang diperlukan sesuai dengan peraturan perundang-undangan yang berlaku di Indonesia dan secara berkala memastikan kepatuhan terhadap ketentuan yang dipersyaratkan dalam perizinan tersebut.

Sejalan dengan itu, kami terus memperkuat pengelolaan lingkungan melalui peningkatan perlindungan ekosistem, pengelolaan sumber daya air, limbah, dan emisi udara, serta pelaksanaan reklamasi lahan secara bertahap.

Hingga akhir tahun 2025, Merdeka telah mereklamasi lahan seluas 143,56 hektare. Selain itu, pada tahun pelaporan, Merdeka juga melaksanakan restorasi lahan kritis melalui rehabilitasi daerah aliran sungai (DAS) seluas 6.084 hektare, di luar area rehabilitasi DAS yang telah diserahkan kepada pemerintah.

Kami juga memperluas upaya konservasi keanekaragaman hayati dan mitigasi perubahan iklim guna memastikan bahwa seluruh operasional selaras dengan tujuan keberlanjutan jangka panjang, sekaligus menunjukkan kepatuhan terhadap standar global dan peraturan yang berlaku melalui penerapan Sistem Manajemen Lingkungan yang terintegrasi.

Strengthening Foundations and Advancing Strategic Growth

The year 2025 marked a pivotal period for Merdeka as we strengthened our operational foundation by scaling up operations and advancing our strategic projects. Tujuh Bukit Gold Mine continued to deliver consistent production, while PT Merdeka Gold Resources Tbk (MGR), our subsidiary, commenced mining operations in October 2025, followed by its first gold production in February 2026 and initial gold sales to a refining facility in March 2026.

In the nickel business line, PT Merdeka Battery Materials Tbk (MBM) strengthened its operational performance and expanded its production capacity. This included increased capacity and improved operational efficiency at the Sulawesi Cahaya Mineral (SCM) Mine, stable production and ore supply to the Rotary Kiln Electric Furnace (RKEF) smelter, and significant progress in downstream projects, including the nickel matte converter, the Acid Iron Metal (AIM) facility, and the High-Pressure Acid Leach (HPAL) project, which began demonstrating commercial results through our mixed hydroxide precipitate (MHP) sales.

Environment

In 2025, Merdeka demonstrated strong environmental performance, marked by the successful achievement of ISO 14001:2015 certification across all (100%) of its subsidiaries, reaffirming the Company's commitment to responsible and sustainable mining practices.

All Merdeka operations have obtained the required environmental permits in accordance with applicable laws and regulations in Indonesia and periodically ensure compliance with the requirements stipulated in those permits.

In parallel, we continued to strengthen environmental management through enhanced ecosystem protection, water resource management, waste and air emissions control, as well as progressive land reclamation.

By the end of 2025, Merdeka had reclaimed a total land area of 143.56 hectares. In addition, during the reporting year, Merdeka carried out critical land restoration through watershed rehabilitation covering 6,084 hectares, excluding areas that had already been handed over to the government.

We also expanded our efforts in biodiversity conservation and climate change mitigation to ensure that our operations remain aligned with long-term sustainability objectives, while demonstrating compliance with global standards and applicable regulations through the implementation of an integrated Environmental Management System.

Selain itu, Merdeka melalui MTI telah menyelesaikan pembangunan fasilitas *Acid Iron Metal* (AIM) untuk mengolah sisa bijih dari Tambang Tembaga Wetar. Fasilitas ini menghasilkan berbagai produk, termasuk asam sulfat dan uap, yang kemudian digunakan sebagai bahan baku pada pabrik HPAL yang memproduksi *Mixed Hydroxide Precipitate* (MHP) sebagai bahan baku baterai kendaraan listrik. Inisiatif ini merupakan bagian dari komitmen Merdeka dalam menerapkan prinsip ekonomi sirkular dan konservasi mineral.

Menangani Perubahan Iklim

Sejalan dengan Kebijakan Iklim Merdeka serta komitmen kami dalam menangani perubahan iklim dan mempercepat upaya dekarbonisasi, Merdeka memperluas inisiatif iklim pada tahun 2025 untuk mengurangi jejak karbon.

Salah satu inisiatif tersebut adalah penandatanganan Perjanjian Jual Beli *Renewable Energy Certificate* (REC) oleh MGR dengan PT Management Energy Indonesia, entitas anak PT Perusahaan Listrik Negara (PLN). Melalui perjanjian ini, listrik yang digunakan di Tambang Emas Pani, mulai 1 Januari 2026, akan bersumber dari energi terbarukan yang dihasilkan oleh Pembangkit Listrik Tenaga Air Bakaru.

Kesehatan dan Keselamatan Kerja

Kesehatan dan Keselamatan Kerja (K3) tetap menjadi prioritas utama di Merdeka. Berlandaskan prinsip "Setiap Orang Selamat, Selalu", Perusahaan terus memperkuat budaya keselamatan serta meningkatkan sistem manajemen K3 untuk secara efektif mengidentifikasi dan memitigasi risiko di seluruh operasional.

Pada tahun 2025, *Total Recordable Injury Frequency Rate* (TRIFR) Merdeka menurun dari 0,38 pada tahun 2024 menjadi 0,35 pada tahun 2025, sementara *Lost Time Injury Frequency Rate* (LTIFR) meningkat dari 0,07 menjadi 0,10. Dengan duka mendalam, Perusahaan melaporkan terjadinya kecelakaan fatal yang melibatkan karyawan kontraktor di tambang nikel SCM, yang disebabkan oleh insiden lalu lintas di area *hauling*. Perusahaan telah melaporkan kejadian tersebut kepada otoritas dan pemangku kepentingan terkait sesuai dengan peraturan perundang-undangan yang berlaku. Selanjutnya, Perusahaan melakukan investigasi menyeluruh untuk mengidentifikasi akar penyebab kejadian dan menerapkan tindakan perbaikan serta langkah pengendalian tambahan guna mencegah terulangnya kejadian serupa di masa mendatang.

In addition, Merdeka, through MTI, has completed the construction of the Acid Iron Metal (AIM) facility to process residual ore from the Wetar Copper Mine. The facility produces various outputs, including sulfuric acid and steam, which are utilized as inputs for the HPAL plant to produce Mixed Hydroxide Precipitate (MHP), a key raw material for electric vehicle batteries. This initiative is part of Merdeka's commitment to implementing circular economy principles and conserving mineral resources.

Addressing Climate Change

In line with Merdeka's Climate Policy and our commitment to addressing climate change and accelerating decarbonization efforts, Merdeka expanded its climate initiatives in 2025 to reduce its carbon footprint.

One of these initiatives is the signing of a Renewable Energy Certificate (REC) Purchase Agreement by MGR with PT Management Energy Indonesia, a subsidiary of PT Perusahaan Listrik Negara (PLN). Through this agreement, the electricity used at the Pani Gold Mine, starting January 1, 2026, will be sourced from renewable energy generated by the Bakaru Hydropower Plant.

Occupational Health and Safety

Occupational Health and Safety (OHS) remains a fundamental priority at Merdeka. Guided by the principle of "Everyone Safe, Always," the Company continues to strengthen its safety culture and enhance its OHS management systems to effectively identify and mitigate risks across all operations.

In 2025, Merdeka's Total Recordable Injury Frequency Rate (TRIFR) decreased from 0.38 in 2024 to 0.35 in 2025, while the Lost Time Injury Frequency Rate (LTIFR) increased from 0.07 to 0.10. It is with deep sadness that the Company reports a fatal accident involving a contractor employee at the SCM nickel mine, resulting from a traffic incident in the hauling area. The Company had reported the incident to the relevant authorities and stakeholders in accordance with applicable laws and regulations. The Company subsequently conducted a comprehensive investigation to identify the root causes of the incident and implemented corrective actions and additional control measures to prevent similar occurrences in the future.

Ketenagakerjaan

Dalam mengembangkan sumber daya manusia, Merdeka tetap berkomitmen untuk memprioritaskan perekrutan tenaga kerja lokal, membekali individu dengan keterampilan yang dibutuhkan untuk memasuki dunia kerja, sekaligus mendukung keberlanjutan jangka panjang operasional pertambangan kami. Pada saat yang sama, kami terus memperkuat pengelolaan sumber daya manusia sebagai fondasi kinerja berkelanjutan melalui transformasi organisasi, penerapan sistem manajemen kinerja terintegrasi, serta pengembangan kapabilitas karyawan yang selaras dengan dinamika industri pertambangan yang terus berkembang.

Komitmen ini tercermin dalam upaya kami menciptakan lingkungan kerja yang sehat, inklusif, dan berorientasi pada pertumbuhan, termasuk melalui implementasi *Employee Assistance Program*, digitalisasi pembelajaran, serta penguatan jalur karier yang jelas dan adil. Menyikapi perubahan lanskap dunia kerja, kami mendorong budaya yang kolaboratif, transparan, dan berbasis inovasi, yang didukung oleh pemanfaatan teknologi untuk menghasilkan pengambilan keputusan yang lebih tepat dan strategis. Melalui berbagai inisiatif tersebut, kami bertujuan membangun organisasi yang tangguh dan adaptif, yang mampu mencapai pertumbuhan berkelanjutan bersama seluruh karyawan Merdeka.

Hak Asasi Manusia

Merdeka menempatkan penghormatan terhadap hak asasi manusia sebagai inti dari operasional bisnisnya. Pada tahun 2025, Perusahaan terus memperkuat kesadaran dan implementasi hak asasi manusia melalui pemberian pelatihan yang terarah kepada personel keamanan, guna memastikan bahwa seluruh tugas dilaksanakan dengan penuh penghormatan terhadap martabat dan hak setiap individu, khususnya dalam interaksi dengan karyawan, kontraktor, dan masyarakat setempat. Selain itu, Merdeka memperluas sosialisasi hak asasi manusia kepada perwakilan kontraktor, guna memperkuat kesamaan pemahaman serta mendorong penerapan prinsip-prinsip hak asasi manusia secara konsisten di seluruh rantai nilai.

Komitmen kami dalam menjunjung tinggi hak asasi manusia juga mendapat pengakuan melalui berbagai penghargaan pada tahun 2025. Penghargaan tersebut antara lain penghargaan Penilaian Risiko Bisnis dan Hak Asasi Manusia (PRISMA) yang diterima dari Menteri Hak Asasi Manusia Republik Indonesia; Lestari Awards dari KG Media serta Asia ESG Positive Impact Awards 2025, keduanya dalam kategori Hak Asasi Manusia & Standar Ketenagakerjaan; serta Business and Human Rights Award 2025 dari SETARA Institute.

Employment

In developing our human capital, Merdeka remains committed to prioritizing local workforce recruitment, equipping individuals with the skills needed to enter the workforce while supporting the long-term sustainability of our mining operations. At the same time, we continue to strengthen our human capital management as a foundation for sustainable performance through organizational transformation, the implementation of an integrated performance management system, and the development of employee capabilities aligned with the evolving dynamics of the mining industry.

This commitment is reflected in our efforts to foster a healthy, inclusive, and growth-oriented work environment, including the implementation of the Employee Assistance Program, the digitalization of learning, and the enhancement of clear and equitable career pathways. In response to the changing workforce landscape, we promote a collaborative, transparent, and innovation-driven culture, supported by the use of technology to enable more informed and strategic decision-making. Through these initiatives, we aim to build a resilient and agile organization capable of achieving sustainable growth together with all Merdeka employees.

Human Rights

Merdeka places respect for human rights at the core of its business operations. In 2025, the Company continued to strengthen human rights awareness and implementation by providing targeted training to its security personnel, ensuring that all duties are carried out with full respect for the dignity and rights of individuals, particularly in interactions with employees, contractors, and local communities. In addition, Merdeka expanded its human rights outreach to contractors' representatives, reinforcing shared expectations and promoting consistent adherence to human rights principles across its value chain.

Our commitment to upholding human rights was further recognized through several awards in 2025. These include the Business and Human Rights Risk Assessment (PRISMA) award received from the Minister of Human Rights of the Republic of Indonesia; the Lestari Awards from KG Media and the Asia ESG Positive Impact Awards 2025, both in the Human Rights & Labor Standards category; and the 2025 Business and Human Rights Award from SETARA Institute.

Pengembangan dan Pemberdayaan Masyarakat

Merdeka berkomitmen untuk meningkatkan kesejahteraan masyarakat di sekitar wilayah operasionalnya sebagai bagian integral dari strategi bisnis berkelanjutan yang selaras dengan Tujuan Pembangunan Berkelanjutan (SDGs). Komitmen ini diwujudkan melalui delapan pilar pengembangan dan pemberdayaan masyarakat (PPM) sesuai dengan peraturan pemerintah, yaitu pendidikan, kesehatan, peningkatan pendapatan, kemandirian ekonomi, pengembangan sosial dan budaya, kesadaran lingkungan, kelembagaan masyarakat, serta infrastruktur, yang masing-masing berkontribusi terhadap pencapaian target SDGs yang relevan.

Pada tahun 2025, Merdeka merealisasikan dana sebesar USD 5,69 juta untuk program PPM, yang mencerminkan komitmen perusahaan dalam memberikan dampak positif yang berkelanjutan serta mendukung pembangunan sosial, ekonomi, dan lingkungan di seluruh wilayah operasionalnya. Nilai tersebut melampaui target tahun berjalan dan meningkat dibandingkan realisasi tahun sebelumnya. Program PPM Merdeka dilaksanakan di lima provinsi, yaitu Provinsi Sulawesi Tengah, Sulawesi Tenggara, Gorontalo, Jawa Timur, dan Maluku.

Pengakuan atas Komitmen Keberlanjutan Merdeka

Hal ini tercermin dari berbagai pencapaian yang diraih Merdeka sepanjang tahun 2025 sebagai berikut:

- Perusahaan mempertahankan peringkat A dalam MSCI ESG Ratings, menjadikannya satu-satunya perusahaan pertambangan Indonesia dalam kategori MSCI *Diversified Metals and Mining* yang meraih pencapaian tersebut.
- Merdeka mempertahankan Sustainalytics ESG Risk Rating pada kategori "Medium Risk" dengan skor 27,8, yang menegaskan posisi Merdeka sebagai perusahaan pertambangan terdiversifikasi terdepan di Indonesia dalam kategori penilaian komprehensif.
- Merdeka memperoleh peringkat B- dari CDP untuk pelaporan Perubahan Iklim tahun 2025, yang menegaskan posisi Merdeka sebagai satu-satunya perusahaan pertambangan Indonesia di sektor logam dan pertambangan terdiversifikasi yang meraih peringkat tersebut.
- Merdeka memperoleh predikat "Committed", sementara MBM meraih predikat "Verified" dalam Sustainable Business Integrity Index (INSTAR) 2025 yang diselenggarakan oleh Tempo Data Science dan Transparency International Indonesia (TII).
- Merdeka meraih peringkat Platinum dan MBM meraih peringkat Gold pada Asia Sustainability Reporting Rating (ASRRAT) 2025 yang diselenggarakan oleh National Center for Corporate Reporting (NCCR).
- MTI menerima penghargaan TOP CSR Award dan TOP Leader on CSR Commitment 2025 sebagai pengakuan atas tata kelola dan kinerja CSR yang unggul.

Community Development and Empowerment

Merdeka is committed to enhancing the well-being of communities surrounding its operational areas as an integral part of its sustainable business strategy, aligned with the Sustainable Development Goals (SDGs). This commitment is implemented through eight pillars of community development and empowerment (CDE), in accordance with government regulations: education, health, income generation, economic independence, social and cultural development, environmental awareness, community institutions, and infrastructure, each contributing to the achievement of relevant SDG targets.

In 2025, Merdeka realized disbursement of USD 5.69 million to CDE programs, reflecting its commitment to delivering sustainable positive impacts and supporting social, economic, and environmental development across its areas of operation. The amount exceeded the current year's target and increased compared to the previous year's realization. Merdeka's CDE programs are implemented across five provinces, namely Central Sulawesi, Southeast Sulawesi, Gorontalo, East Java, and Maluku.

Recognition of Merdeka's Commitment to Sustainability

This is reflected in the various achievements attained by Merdeka throughout 2025, as follows:

- Merdeka maintained an A rating in MSCI ESG Ratings, making it the only Indonesian mining company in the MSCI *Diversified Metals and Mining* category to achieve this rating.
- Merdeka maintained its Sustainalytics ESG Risk Rating in the "Medium Risk" category with a score of 27.8, reaffirming its position as a leading diversified mining company in Indonesia under a comprehensive assessment framework.
- Merdeka received a B- rating from CDP for its 2025 Climate Change disclosure, affirming its position as the only Indonesian mining company in the diversified metals and mining sector to achieve this rating.
- Merdeka received a "Committed" rating, while MBM achieved a "Verified" rating in the 2025 Sustainable Business Integrity Index (INSTAR), organized by Tempo Data Science and Transparency International Indonesia (TII).
- Merdeka achieved a Platinum rating and MBM achieved a Gold rating in the 2025 Asia Sustainability Reporting Rating (ASRRAT), organized by the National Center for Corporate Reporting (NCCR).
- MTI received the TOP CSR Award and TOP Leader on CSR Commitment 2025 in recognition of its excellence in CSR governance and performance.

Melangkah ke Depan [E.5]

Seiring Merdeka terus meningkatkan skala operasional dan memajukan proyek-proyek strategisnya, Perusahaan tetap berkomitmen kuat terhadap praktik pertambangan yang bertanggung jawab sekaligus terus memperkuat penerapannya di seluruh aspek kegiatan. Kami secara konsisten meningkatkan standar, sistem, dan pengawasan untuk memastikan bahwa praktik pertambangan yang bertanggung jawab tetap menjadi bagian integral dari arah pertumbuhan kami.

Dalam menjalankan ambisi strategis tersebut, Merdeka menghadapi sejumlah tantangan utama, termasuk pemenuhan persyaratan perizinan dari pemerintah pusat dan daerah, serta risiko operasional seperti kompleksitas geoteknik dan potensi insiden keselamatan kerja. Perusahaan juga menghadapi risiko eksternal, termasuk aktivitas pertambangan ilegal, potensi konflik dengan masyarakat setempat, serta isu hubungan industrial.

Untuk menghadapi tantangan tersebut, Merdeka menerapkan praktik manajemen risiko yang kuat, mendorong keunggulan operasional, serta menjaga keterlibatan proaktif dengan para pemangku kepentingan guna memastikan bahwa seluruh kegiatan usaha dijalankan secara aman, sesuai dengan peraturan yang berlaku, dan dengan tingkat akuntabilitas yang tinggi.

Dukungan berkelanjutan dari para pemegang saham dan pemangku kepentingan memungkinkan kami untuk terus memperkuat kinerja keberlanjutan serta meningkatkan keyakinan kami terhadap kemampuan Merdeka dalam menghadapi tantangan di masa depan secara efektif. Dengan komitmen yang teguh terhadap pengelolaan lingkungan, tanggung jawab sosial, dan tata kelola yang baik, kami berada pada posisi yang tepat untuk mewujudkan visi menjadi pemimpin yang diakui dalam keberlanjutan di industri pertambangan dan logam global.

Atas nama Direksi, kami menyampaikan terima kasih dan apresiasi yang tulus kepada seluruh pemegang saham dan pemangku kepentingan atas dukungan, kepercayaan, dan kolaborasi yang berkelanjutan.

Looking Ahead

As Merdeka continues to scale up its operations and advance its strategic projects, the Company remains firmly committed to responsible mining practices while continuously strengthening their implementation across all aspects of its activities. We are consistently enhancing our standards, systems, and oversight to ensure that responsible mining remains integral to our growth trajectory.

In pursuing these strategic ambitions, Merdeka faces a number of key challenges, including the fulfillment of licensing requirements from central and regional authorities, as well as operational risks such as geotechnical complexities and potential workplace safety incidents. The Company is also exposed to external risks, including illegal mining activities, potential conflicts with local communities, and industrial relations issues.

To address these challenges, Merdeka applies robust risk management practices, drives operational excellence, and maintains proactive engagement with stakeholders to ensure that all business activities are conducted safely, in full compliance with applicable regulations, and with a high level of accountability.

The continued support of our shareholders and stakeholders enables us to further strengthen our sustainability performance and reinforces our confidence in Merdeka's ability to navigate future challenges effectively. With an unwavering commitment to environmental stewardship, social responsibility, and good governance, we are well-positioned to achieve our vision of becoming a recognized leader in sustainability within the global mining and metals industry.

On behalf of the Board of Directors, we extend our sincere thanks and appreciation to all shareholders and stakeholders for their continued support, trust, and collaboration.

Jakarta, 24 April 2026 | April 24, 2026
Atas Nama Direksi | On Behalf of the Board of Directors



Albert Saputro
Presiden Direktur
President Director

Sustainability Performance Highlights

Ikhtisar Kinerja Keberlanjutan



Land reclamation at BSI

Ikhtisar Kinerja Keberlanjutan

Sustainability Performance Highlights [B.1][B.2][B.3][F.2]

Economic

Revenue (Million USD)

1,894.76	2024 2,239.03	2023 1,706.78
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Net Profit (Million USD)

16.15	2024 9.80	2023 5.66
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Gold Production (Ounces)

103,156	2024 115,867	2023 138,666
----------------	-----------------	-----------------

Copper Production (Tonnes)

10,454	2024 13,902	2023 12,706
---------------	----------------	----------------

Nickel Pig Iron (NPI) Production (Tonnes)

73,871	2024 82,161	2023 65,117
---------------	----------------	----------------

Nickel Matte Production (Tonnes)

19,998	2024 50,315	2023 30,333
---------------	----------------	----------------

Environment

Energy Consumption (Gigajoule)

37,105,763	2024 35,429,408*	2023 29,639,229*
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Energy Intensity by Revenue (GJ/ million USD)

19,583	2024 15,824*	2023 17,366*
---------------	-----------------	-----------------

GHG Emission Scope 1 and 2 (Ton CO₂ (e))

5,446,175	2024 5,429,858*	2023 4,149,653*
------------------	--------------------	--------------------

Emission Intensity by Revenue (Ton CO₂ (e)/ million USD)

2,874	2024 2,425*	2023 2,431*
--------------	----------------	----------------

Emission Intensity - Gold (Ton CO₂ (e)/oz Au)

0.91	2024 1.11*	2023 0.57*
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Emission Intensity - Copper (Ton CO₂ (e)/ton Cu)

5.64	2024 7.28	2023 8.81
-------------	--------------	--------------

Emission Intensity - NPI (Ton CO₂ (e)/ton Ni)

61.13	2024 56.84	2023 56.86
--------------	---------------	---------------

Emission Intensity - Nickel Matte (Ton CO₂ (e)/ton Ni)

1.66	2024 1.31	2023 1.87
-------------	--------------	--------------

Water Withdrawal (Megaliters)

10,147	2024 9,231	2023 6,865
---------------	---------------	---------------

Water Consumption (Megaliters)

10,073	2024 8,153	2023 6,736
---------------	---------------	---------------

Land Reclamation (Ha)

49.60	2024 26.77	2023 16.17
--------------	---------------	---------------

* Restated due to improvement in calculation methodology.

Social

Fatalities

One fatality involving a contractor's employee at the Konawe nickel mine (2025).

Lost Time Injury Frequency Rate (LTIFR)

0.10	2024 0.07	2023 0.09
-------------	--------------	--------------

Community Development and Empowerment Fund (million USD)

5.69	2024 5.61	2023 3.07
-------------	--------------	--------------

Female Heavy Equipment Operators

Female heavy equipment operators at Wetar Copper Mine and Tujuh Bukit Gold Mine represent **11%** and **7%** of the total operators, respectively, as of the end of 2025.

Training Hours

129,135
(14 training hours per employee)

Human Rights Training

Human rights training was provided to **85%** of security personnel at Konawe Nickel Mine, **35%** at AIM Plant, and **32%** at Pani Gold Mine in 2025.

Governance

Oversight

BoD's oversight of sustainability commitment implementation.

Remuneration

BoD and BoC's **pay is linked to sustainability**.

Code of Conduct

All employees (100%) received a refresher on the Code of Conduct through periodic email communications in 2025.

Contractors

A comprehensive evaluation of Contractor Management System (CMS) compliance was conducted for **100%** contractors during selection process and **93%** of the main contractors at Merdeka's operational sites during their contract implementation in 2025.

Risk Management

Risk management training was attended by **446** participants from Tujuh Bukit Gold Mine, Wetar Copper Mine, Pani Gold Mine, Konawe Nickel Mine, and AIM Plant in 2025.

Merdeka at a Glance

Sekilas Tentang Merdeka



▲ Ore Preparation Plant at Pani Gold Mine

RATING ESG

ESG Ratings



Rating ESG MSCI

Merdeka mempertahankan peringkat ESG MSCI A untuk tahun ketiga berturut-turut, disertai dengan peningkatan skor. Kinerja ini menempatkan Merdeka sebagai pemimpin dalam MSCI ESG industry-adjusted company score di antara perusahaan pertambangan dan logam di Indonesia, serta sebagai satu-satunya perusahaan di sektor diversified metals and mining yang memperoleh peringkat A dari MSCI.

MSCI ESG Ratings

Merdeka maintained an MSCI ESG Rating of A for three consecutive years, accompanied by an improvement in its score. This performance places Merdeka as a leader in the MSCI ESG industry-adjusted company score among mining and metals companies in Indonesia, and as the only company in the diversified metals and mining sector to receive an A rating from MSCI.

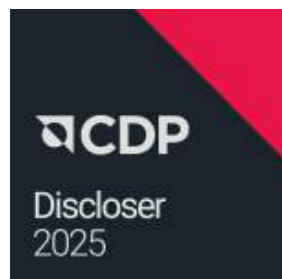


Rating Risiko ESG Sustainalytics

Meningkatkan peringkat menjadi "Risiko Menengah" dengan skor 27,8 dan menempati peringkat 1 di antara perusahaan pertambangan terdiversifikasi di Indonesia dalam kategori penilaian komprehensif.

Sustainalytics ESG Risk Rating

Achieved a "Medium Risk" rating with a score of 27.8 and ranked #1 among diversified mining companies in Indonesia in the comprehensive assessment category.



Pengungkapan Perubahan Iklim CDP 2025

Merdeka terus meningkatkan kualitas pelaporan perubahan iklim melalui penyusunan dan penyampaian Climate Change Report kepada CDP, dengan capaian skor 'B-' (dalam rentang penilaian D hingga A).

CDP 2025 Climate Change disclosure

Merdeka continued enhancing its climate change reporting through the preparation and submission of its Climate Change Report to CDP, resulting in a score of 'B-' (within the D until A scoring range).

Profil Merdeka Copper Gold

Merdeka Copper Gold Profile [2-1] [2-3] [2-6] [C.2] [C.4]

Nama Perusahaan Company Name	PT Merdeka Copper Gold Tbk ("Merdeka")	
Tanggal Pendirian Date of Establishment	5 September 2012	
Bidang Usaha Line of Business	Perusahaan holding bidang pertambangan dan jasa konsultasi manajemen lainnya. Holding company in the field of mining and other management consultancy services.	
Kantor Pusat Head Office	Treasury Tower 67-68 th Floor District 8 SCBD Lot. 28 Jalan Jenderal Sudirman Kav. 52-53 South Jakarta 12910, Indonesia	Telephone: +62 21 39525580 Facsimile: +62 21 39525589 corporate.secretary@merdekacoppergold.com www.merdekacoppergold.com

PT Merdeka Copper Gold Tbk adalah perusahaan induk pertambangan logam dan mineral yang berkantor pusat di Jakarta. Merdeka mengoperasikan dan mengembangkan sejumlah proyek pertambangan strategis dengan aset berkualitas tinggi, mencakup cadangan mineral kelas dunia dan operasi tambang terkemuka di Indonesia.

PT Merdeka Copper Gold Tbk is an Indonesian metals and minerals mining holding company headquartered in Jakarta. Merdeka operates and develops a number of strategic mining projects with high-quality assets, including world-class mineral reserves and leading mining operations in Indonesia.

Saat ini, Merdeka mengoperasikan empat tambang di Indonesia. Di Banyuwangi, Jawa Timur, Merdeka mengelola Tambang Emas Tujuh Bukit, sebuah tambang emas berbiaya rendah yang dijalankan dengan standar pengelolaan lingkungan yang bertanggung jawab. Di Maluku Barat Daya, Merdeka mengoperasikan Tambang Tembaga Wetar. Tambang ketiga adalah Tambang Emas Pani di Pohuwato, Gorontalo, yang mulai melakukan kegiatan penambangan pada 1 Oktober 2025 yang dilanjutkan dengan penuangan emas perdana pada 14 Februari 2026.

Currently, Merdeka operates four mines in Indonesia. In Banyuwangi, East Java, Merdeka manages the Tujuh Bukit Gold Mine, a low-cost gold mine operated with responsible environmental management practices. In Southwest Maluku, Merdeka operates the Wetar Copper Mine. The third mine is the Pani Gold Mine in Pohuwato, Gorontalo, which began mining operations on October 1, 2025, followed by its first gold pour on February 14, 2026.

Selain itu, melalui PT Merdeka Battery Materials Tbk (MBM), Merdeka mengelola operasi tambang dan pabrik peleburan nikel yang terintegrasi dengan pengembangan kawasan industri nikel di Sulawesi, menjadikan perusahaan bagian dari ekosistem transisi energi global sebagai pemasok utama bahan baku baterai kendaraan listrik.

In addition, through PT Merdeka Battery Materials Tbk (MBM), Merdeka manages nickel mining operations and smelter facilities integrated with the development of a nickel industrial area in Sulawesi, positioning the company as part of the global energy transition ecosystem and a key supplier of battery materials for the world's electric vehicle industry.

Merdeka juga mengelola Pabrik *Acid, Iron, Metal* (AIM) di Morowali, Sulawesi Tengah, yang memproses bijih sisa dari Tambang Tembaga Wetar serta memperpanjang umur operasional tambang tersebut.

Merdeka also operates the Acid, Iron, Metal (AIM) Plant in Morowali, Central Sulawesi, which processes spent ore from the Wetar Copper Mine and extends the mine's operational life.

Di luar operasi yang telah berjalan, Merdeka tengah mengembangkan Proyek Tembaga Tujuh Bukit, yang berlokasi di bawah Tambang Emas Tujuh Bukit. Proyek bawah tanah ini merupakan salah satu sumber daya tembaga terbesar di dunia yang belum dikembangkan, dengan potensi umur tambang hingga 30 tahun serta kapasitas untuk meningkatkan produksi tembaga Indonesia sebesar 10-15 persen.

Beyond its existing operations, Merdeka is developing the Tujuh Bukit Copper Project, located beneath the Tujuh Bukit Gold Mine. This underground project represents one of the largest undeveloped copper resources in the world, with a potential mine life of up to 30 years and the capacity to increase Indonesia's copper production by 10-15 percent.

Skala Perusahaan

Corporate Scale [2-6][C.3][C.4]

Keterangan Description	2025	
Sumber Daya Manusia Human Resources	9,557	Karyawan Employees
Total Aset Total Assets	5,707.42	Juta USD Million USD
Total Liabilitas Total Liabilities	2,782.56	Juta USD Million USD
Total Ekuitas Total Equity	2,924.86	Juta USD Million USD
Laba Bersih Net Profit	16.15	Juta USD Million USD
Pendapatan Usaha Revenue	1,894.76	Juta USD Million USD
Penjualan Sales		
Emas Gold	104,168	Ons Ounces
Tembaga Copper	10,717	Ton Tonnes
Nickel pig iron (NPI) Nickel pig iron (NPI)	72,106	Ton Tonnes
Nickel matte Nickel matte	19,715	Ton Tonnes
Tujuan Penjualan Sales Destination		
Dalam Negeri Domestic	71%	
Luar Negeri* Export	29%	

*Tujuan ekspor adalah Hongkong, Singapura, Republik Rakyat Tiongkok, Monako, Britania Raya, Australia, dan Swiss/The export destinations include Hong Kong, Singapore, the People's Republic of China, Monaco, the United Kingdom, Australia, and Switzerland.

Nilai Ekonomi Langsung yang Dihasilkan dan Didistribusikan Direct Economic Value Generated and Distributed [201-1][14.9.2][14.23.1][14.23.2]

Deskripsi Description	2025 (Million USD)	2024 (Million USD)	2023 (Million USD)
Nilai Ekonomi yang Dihasilkan Economic Value Generated			
Pendapatan Revenue	1,850.52	2,190.75	1,852.84
Penjualan Aset Sales of Assets	1.93	0.30	0.01
Total Nilai yang Dihasilkan Total Economic Value Generated	1,852.45	2,191.05	1,852.86
Nilai Ekonomi Didistribusikan Economic Value Distributed			
Beban Pokok Pendapatan Cost of revenue	1,313.21	1,842.43	1,623.42
Gaji Karyawan dan Manfaat Lainnya Wages and Benefits	98.40	87.04	-
Pembayaran Beban Keuangan Finance Expenses	155.66	144.27	108.55
Pembayaran Royalti Payment of Royalty	113.68	60.46	31.88
Pembayaran Pajak Penghasilan Badan Payments of Corporate Income Tax	41.32	47.12	61.40
Program CSR Program CSR	5.69	5.61	3.08
Total Nilai Ekonomi yang Didistribusi Total Economic Value Distributed	1,727.95	2,186.93	1,828.33
Nilai Ekonomi yang Ditahan Economic Value Retained	124.49	4.12	24.53

Informasi nilai ekonomi dihasilkan dan didistribusikan tahun 2025 disajikan berbasis kas berdasarkan Laporan Keuangan yang telah diaudit. Informasi tersebut sesuai dengan pengungkapan Standar GRI. Pada tahun 2025, tidak terdapat produk yang ditarik kembali dan tidak terdapat bantuan finansial yang diterima dari pemerintah. Detail kinerja ekonomi dapat dilihat di [Laporan Keuangan 2025](#). [201-4] [F.29] [14.23.3]

Informasi nilai ekonomi dihasilkan dan didistribusikan tahun 2025 disajikan berbasis kas berdasarkan Laporan Keuangan yang telah diaudit. Informasi tersebut sesuai dengan pengungkapan Standar GRI. Pada tahun 2025, tidak terdapat produk yang ditarik kembali dan tidak terdapat bantuan finansial yang diterima dari pemerintah. Detailed economic performance information can be found in the [2025 Financial Statements](#).

Aktivitas dan Lokasi Operasi Merdeka

Merdeka's Operations and Activities [C.3][C.4][2-2][2-6]



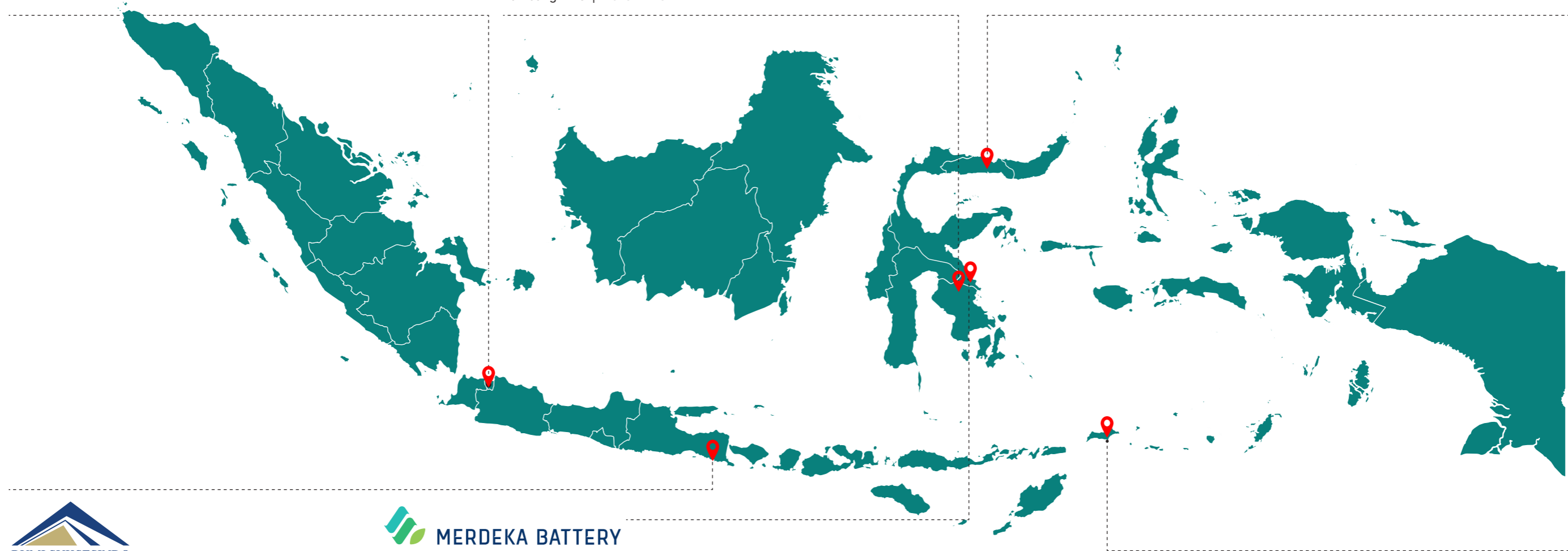
JAKARTA, INDONESIA
PT Merdeka Copper Gold Tbk
Kantor Pusat
Head office



ROUTA, KONAWE, SULAWESI TENGGARA
ROUTA, KONAWE, SOUTHEAST SULAWESI
melalui PT Merdeka Battery Materials Tbk
PT Sulawesi Cahaya Mineral (SCM)
Tambang Nikel | Nickel Mine



POHUWATO, GORONTALO
PT Merdeka Gold Resources Tbk
Tambang Emas Pani
Pani Gold Mine



BANYUWANGI, JAWA TIMUR
BANYUWANGI, EAST JAVA
PT Bumi Suksesindo (BSI)
Tambang Emas Tujuh Bukit
Tujuh Bukit Gold Mine
Proyek Tembaga Tujuh Bukit
Tujuh Bukit Copper Project



MOROWALI, SULAWESI TENGAH
MOROWALI, CENTRAL SULAWESI
melalui PT Merdeka Battery Materials Tbk

PT Merdeka Tsingshan Indonesia (MTI)
Proyek Acid, Iron, dan Metal (AIM)
Acid, Iron, and Metal (AIM) project

PT Bukit Smelter Indonesia (PT BSID)
PT Cahaya Smelter Indonesia (PT CSID)
PT Zhao Hui Nickel (ZHN)
Pabrik Peleburan Nikel | Nickel Smelter

PT Huaneng Metal Industry (HNMI)
Fasilitas konversi nikel *matte* kadar tinggi
High grade nickel *matte* conversion facility



PULAU WETAR, MALUKU BARAT DAYA
WETAR ISLAND, SOUTHWEST MALUKU

PT Batutua Kharisma Permai (BKP)
Tambang Tembaga Wetar
Wetar Copper Mine

PT Batutua Tembaga Raya (BTR)
Pemrosesan dan pemurnian tembaga Wetar
Wetar copper processing and refining

Struktur Pemegang Saham Perusahaan

Shareholder Structure [C.3][C.6][2-1]

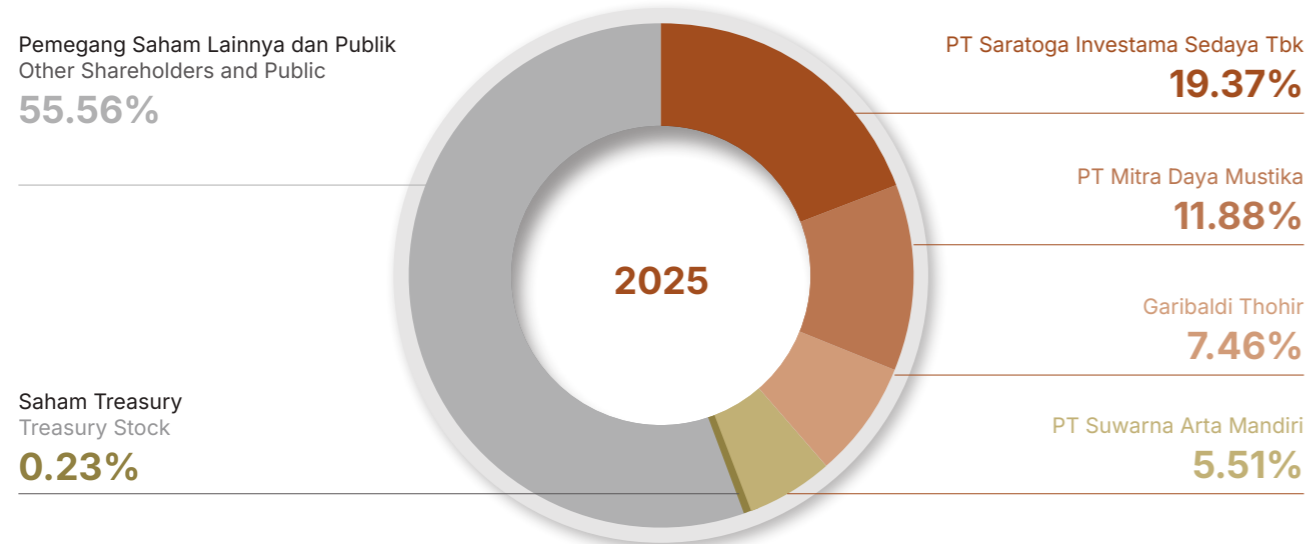
Merdeka dimiliki oleh pemegang saham terkemuka Indonesia di antaranya PT Saratoga Investama Sedaya Tbk, PT Provident Capital Indonesia (melalui PT Mitra Daya Mustika dan PT Suwarna Arta Mandiri), dan Garibaldi Thohir. Tiga pemegang saham utama Merdeka tersebut memiliki rekam jejak yang sangat baik terkait keberhasilannya dalam mengidentifikasi, membangun dan menjalankan beberapa perusahaan publik di Indonesia.

Sepanjang tahun 2025, terdapat perubahan dalam struktur kepemilikan perusahaan dibanding tahun sebelumnya. Susunan pemegang saham perusahaan per tanggal 31 Desember 2025 adalah sebagai berikut:

Merdeka is owned by prominent Indonesian shareholders including PT Saratoga Investama Sedaya Tbk, PT Provident Capital Indonesia (through PT Mitra Daya Mustika and PT Suwarna Arta Mandiri) and Garibaldi Thohir. Merdeka's three major shareholders have exceptional track records in successfully identifying, building, and operating multiple publicly listed companies in Indonesia.

Throughout 2025, there have been changes in the company's ownership structure compared to the previous year. The composition of the company's shareholders as of December 31, 2025 is as follows:

No.	Pemegang Saham Shareholders	Jumlah Saham Number of Shares	%
Pemegang Saham Utama Shareholders			
1	PT Saratoga Investama Sedaya Tbk	4,739,493,062	19.37
2	PT Mitra Daya Mustika	2,907,302,421	11.88
3	Garibaldi Thohir	1,826,062,554	7.46
4	PT Suwarna Arta Mandiri	1,347,254,738	5.51
Saham Treasury Treasury Stock		56,081,700	0.23
Pemegang Saham Lainnya dan Publik Other Shareholders and Public		13,596,789,296	55.55
Total Total		24,472,983,771	100.00



Visi dan Misi

Vision and Mission [C.1]



VISI VISION

Menjadi pemimpin global di industri pertambangan dan logam Indonesia

The Global Leader in the Indonesian Mining and Metals Industry



MISI MISSION

- > Menjadi mitra pengembang pilihan dalam sektor industri pertambangan dan logam Indonesia.
- > Menjadi pemimpin dalam keselamatan, pembangunan berkelanjutan, konservasi lingkungan, dan tanggung jawab sosial perusahaan.
- > Menciptakan nilai serta imbal hasil investor yang unggul melalui investasi yang bijaksana dan pengembangan proyek yang efektif.
- > Menjadi pemimpin dalam inovasi dan efisiensi.
- > To be the development partner of choice in the Indonesian mining & metals industry.
- > To be a leader in safety, sustainable development, environmental protection & corporate social responsibility.
- > To generate superior value & investor returns through prudent investment and effective project development.
- > To be a leader in innovation and efficiency.

Nilai-nilai Perusahaan Corporate Values [C.1]

Merdeka tumbuh dan berkembang berbasis nilai dan budaya perusahaan yang disingkat sebagai GReAtnESSs.

Pertumbuhan dapat diraih jika kita saling menghormati, bekerja secara akuntabel dan kolaboratif untuk menghasilkan kinerja yang unggul dan senantiasa mengutamakan keselamatan kerja dan keberlanjutan.

Merdeka to grow and develop based on corporate values and culture shortened as GReAtnESSs.

Growth can be achieved if we respect each other, work accountably and collaboratively to achieve excellence, and put safety and sustainability as our top priority.

GReAtnESS

Growth, Respect, Accountability, Collaboration, Excellence, Safety & Sustainability



Sertifikasi bagi Merdeka dan Entitas Anak Tahun 2025 Certifications for Merdeka and Subsidiaries in 2025

Perusahaan Company	Sertifikasi Certification	Institusi Penerbit Issuing Agency	Berlaku Hingga Valid Until
Merdeka (MDKA)	ISO 14001:2015 Environmental Management		6 March 2028
	ISO 45001:2018 Health and Safety Management	PT Intertek Utama Services	7 March 2028
MDKA Head Office	ISO 14001:2015 Environmental Management		6 March 2028
	ISO 45001:2018 Health and Safety Management	PT Intertek Utama Services	7 March 2028
MBM	ISO 14001:2015 Environmental Management		23 January 2027
	ISO 45001:2018 Health and Safety Management	PT Intertek Utama Services	25 January 2027
MBM Head Office	ISO 14001:2015 Environmental Management		23 January 2027
	ISO 45001:2018 Health and Safety Management	PT Intertek Utama Services	25 January 2027
BSI	ISO 14001:2015 Environmental Management		6 March 2028
	ISO 45001:2018 Health and Safety Management	PT Intertek Utama Services	7 March 2028
BKP	ISO 14001:2015 Environmental Management		6 March 2028
	ISO 45001:2018 Health and Safety Management	PT Intertek Utama Services	7 March 2028
BTR	ISO 14001:2015 Environmental Management		6 March 2028
	ISO 45001:2018 Health and Safety Management	PT Intertek Utama Services	7 March 2028
PETS	ISO 14001:2015 Environmental Management		6 March 2028
	ISO 45001:2018 Health and Safety Management	PT Intertek Utama Services	7 March 2028
GSM	ISO 14001:2015 Environmental Management		6 March 2028
	ISO 45001:2018 Health and Safety Management	PT Intertek Utama Services	7 March 2028
SCM	ISO 14001:2015 Environmental Management		23 January 2027
	ISO 45001:2018 Health and Safety Management	PT Intertek Utama Services	25 January 2027
MTI	ISO 14001:2015 Environmental Management		23 January 2027
	ISO 45001:2018 Health and Safety Management	PT Intertek Utama Services	25 January 2027
	ISO 9001:2015 Quality Management		1 February 2028
BSID	ISO 14001:2015 Environmental Management		11 February 2028
	ISO 45001:2018 Health and Safety Management	JAS-ANZ	1 June 2028
CSID	ISO 14001:2015 Environmental Management		19 June 2028
	ISO 45001:2018 Health and Safety Management	JAS-ANZ	1 June 2028
ZHN	ISO 14001:2015 Environmental Management		11 Dec 2026
	ISO 45001:2018 Health and Safety Management	JAS-ANZ	11 Dec 2026
HNMI	ISO 14001:2015 Environmental Management		23 July 2026
	ISO 45001:2018 Health and Safety Management	JAS-ANZ	23 July 2026

Penghargaan bagi Merdeka dan Entitas Anak Awards for Merdeka and Subsidiaries



Grup Merdeka Raih Penghargaan Platinum dan Emas di ASRRAT 2025
PT Merdeka Copper Gold Tbk meraih Platinum Rank sedangkan PT Merdeka Battery Materials Tbk (MBM) berhasil mempertahankan Gold Rank dalam Asia Sustainability Reporting Rating (ASRRAT) yang diselenggarakan oleh National Center for Corporate Reporting (NCCR) di Hotel Westin Resort Nusa Dua, Bali, pada 28 November 2025.



Merdeka Raih Penghargaan PRISMA oleh Menteri HAM
PT Merdeka Copper Gold Tbk mendapatkan Penghargaan PRISMA (Penilaian Risiko Bisnis dan HAM), menegaskan komitmen integrasi prinsip HAM ke dalam praktik bisnis. Penghargaan diberikan oleh Menteri HAM, Natalius Pigail, di Hotel The Westin, Jakarta Selatan pada 19 September 2025.



Grup Merdeka Raih Lencana 'Verified' dan 'Committed' - INSTAR 2025
PT Merdeka Copper Gold Tbk dan PT Merdeka Battery Materials Tbk meraih Lencana 'Verified' dan 'Committed' dalam Indeks Integritas Bisnis Lestari (INSTAR) 2025. Acara ini diselenggarakan oleh Tempo Data Science, Transparency International Indonesia (TII), dan Institute for Strategic Initiatives (ISI) di Hotel Mulia, Jakarta, pada 12 Desember 2025.



Asia ESG Positive Impact Awards 2025
Setelah mendapatkan penghargaan Lestari Awards 2025 di tingkat nasional, PT Merdeka Copper Gold Tbk juga mendapatkan peringkat Emas di tingkat regional pada Asia ESG Positive Impact Awards 2025 yang diselenggarakan di Kuala Lumpur, Malaysia, keduanya dalam kategori HAM dan Ketenagakerjaan.



Local Hero Program CSR MTI Raih Penghargaan di CSR PDB Awards 2025
Kepala Puskesmas Bahodopi yang berperan sebagai Local Hero dalam program MTI "Merdeka Cegah Stunting", berhasil meraih penghargaan individu dengan predikat "Good" pada ajang CSR Pengembangan Desa Berkelanjutan (PDB) Awards 2025. Penghargaan ini diserahkan dalam malam puncak yang digelar di Hotel Bidakara Jakarta pada 30 September 2025.



Korporasi Penguat Sumber Daya Lokal 2025 - Bumi Suksesindo (BSI)
Bumi Suksesindo meraih penghargaan sebagai 'Korporasi Penguat Sumber Daya Lokal' dalam ajang Beritajatim Award 2025 yang diselenggarakan di Hotel Whiz Luxe Spazio, Surabaya, pada 23 April 2025. PT BSI berhasil memberikan kontribusi terhadap Produk Domestik Regional Bruto (PDRB), menciptakan lapangan kerja, serta mendorong pertumbuhan industri pendukung lainnya

Merdeka Group Wins Platinum and Gold Awards at ASRRAT 2025
PT Merdeka Copper Gold Tbk achieved Platinum Rank, while PT Merdeka Battery Materials Tbk (MBM) successfully maintained its Gold Rank in the Asia Sustainability Reporting Rating (ASRRAT) organized by the National Center for Corporate Reporting (NCCR) at The Westin Resort Nusa Dua, Bali, on November 28, 2025.

Merdeka Receives PRISMA Award from the Minister of Human Rights
PT Merdeka Copper Gold Tbk received the PRISMA Award (Business and Human Rights Risk Assessment), reaffirming its commitment to integrating human rights principles into business practices. The award was presented by the Minister of Human Rights, Natalius Pigail, at The Westin Hotel, South Jakarta, on September 19, 2025.

Merdeka Group Receives 'Verified' and 'Committed' Badges - INSTAR 2025
PT Merdeka Copper Gold Tbk and PT Merdeka Battery Materials Tbk received 'Verified' and 'Committed' badges in the Sustainable Business Integrity Index (INSTAR) 2025, organized by Tempo Data Science, Transparency International Indonesia (TII), and the Institute for Strategic Initiatives (ISI) at Hotel Mulia, Jakarta, on December 12, 2025.

Asia ESG Positive Impact Awards 2025
After receiving the Lestari Awards 2025 at the national level, PT Merdeka Copper Gold Tbk also obtained a Gold rating at the regional level at the Asia ESG Positive Impact Awards 2025, held in Kuala Lumpur, Malaysia, both in the Human Rights and Labor category.

MTI Local Hero CSR Program Wins at CSR PDB Awards 2025
Head of Bahodopi Community Health Center and a Local Hero in the MTI's "Merdeka Cegah Stunting", received an individual award with a "Good" rating at the CSR Sustainable Village Development (PDB) Awards 2025, held at Hotel Bidakara Jakarta on September 30, 2025

Local Resource Empowerment Corporation 2025 - Bumi Suksesindo (BSI)
Bumi Suksesindo received the "Local Resource Empowerment Corporation" award at the Beritajatim Award 2025, held at Hotel Whiz Luxe Spazio, Surabaya, on April 23, 2025. PT BSI has contributed to regional GDP, job creation, and the development of supporting industries.



Merdeka Raih Penghargaan Anugerah Bisnis dan HAM 2025
PT Merdeka Copper Gold Tbk dianugerahi penghargaan sebagai perusahaan yang telah menerapkan penghormatan hak asasi manusia (HAM). Acara ini diselenggarakan oleh SETARA Institute dan Yayasan Tarumanagara di Hotel Pullman pada 25 November 2025.



Grup Merdeka Raih Peringkat A+ dan A dari FIHRRST atas Kinerja Laporan Keberlanjutan
PT Merdeka Copper Gold Tbk dan PT Merdeka Battery Materials Tbk meraih penghargaan dengan peringkat A+ dan A dalam acara "Launching of a Study of the 2024 Sustainability Reports of Listed Companies in Indonesia", yang diselenggarakan oleh FIHRRST dan Walk Free Foundation.



Lestari Awards 2025 - Kategori HAM & Ketenagakerjaan
PT Merdeka Copper Gold Tbk meraih penghargaan Lestari Awards dalam kategori HAM & Standar Tenaga Kerja. Acara ini diselenggarakan oleh KG Media, WWF, dan BAPPENAS.



MTI Raih Penghargaan Top CSR Award 2025 & Top Leader on CSR Commitment
MTI berhasil meraih penghargaan Top CSR Award dan Top Leader on CSR Commitment 2025 berkat komitmen dan kinerja tata kelola CSR yang sangat baik. Penghargaan ini diberikan dalam malam puncak Top CSR Awards 2025 di Hotel Raffles, Jakarta, 11 Juni 2025.



BSI Raih Penghargaan Zero Accident dari Gubernur Jawa Timur
BSI meraih penghargaan Zero Accident dari Gubernur Jawa Timur yang mencerminkan tingkat kematangan manajemen kesehatan dan keselamatan kerja (K3) di BSI.



BSI Mendapat Penghargaan Sunrise of Java Award
BSI mendapat penghargaan Sunrise of Java Award dalam kategori Inspirator Pelaksana Tanggung Jawab Lingkungan Sosial dari Jawa Pos Radar Banyuwangi.

Merdeka Receives 2025 Business and Human Rights Award
PT Merdeka Copper Gold Tbk was recognized as a company that has implemented respect for human rights. The award was presented by SETARA Institute and Tarumanagara Foundation at Hotel Pullman on November 25, 2025.

Merdeka Grup received A+ and A Ratings for its Sustainability Report Performance
PT Merdeka Copper Gold Tbk and PT Merdeka Battery Materials Tbk received A+ and A ratings at the "Launching of a Study of the 2024 Sustainability Reports of Listed Companies in Indonesia", which was organized by FIHRRST and Walk Free Foundation.

Lestari Awards 2025 - Human Rights & Labor Standards Category
PT Merdeka Copper Gold Tbk received the Lestari Awards in the Human Rights & Labor Standards category. The event was organized by KG Media, WWF, and BAPPENAS..

MTI Wins Top CSR Award 2025 & Top Leader on CSR Commitment
MTI received the Top CSR Award and Top Leader on CSR Commitment 2025 in recognition of its strong CSR governance and performance. The award was presented at the Top CSR Awards 2025 ceremony at Hotel Raffles Jakarta on June 11, 2025.

BSI Receives Zero Accident Award from the Governor of East Java
BSI received the Zero Accident Award from the Governor of East Java, reflecting the maturity of occupational health and safety (OHS) management at BSI.

BSI Receives the Sunrise of Java Award
BSI received the Sunrise of Java Award in the category of Inspirational Implementer of Social and Environmental Responsibility from Jawa Pos Radar Banyuwangi.

Keanggotaan dalam Asosiasi Membership in Association [2-28] [C.5]



United Nations
Global Compact

Merdeka adalah anggota Indonesia Mining Association (IMA), Indonesia Corporate Secretary Association (ICSA), Asosiasi Emiten Indonesia dan UN Global Compact.

Merdeka is a member of the Indonesia Mining Association (IMA), the Indonesia Corporate Secretary Association (ICSA), the Indonesian Public Listed Companies Association and UN Global Compact.

Tentang Laporan Keberlanjutan 2025 About Sustainability Report 2025

Laporan Keberlanjutan Merdeka tahun 2025 mengusung tema "Meningkatkan Nilai Jangka Panjang yang Berkelanjutan." Melalui laporan ini, kami bermaksud menyampaikan kepada para pemangku kepentingan mengenai tantangan, peluang, serta strategi keberlanjutan perusahaan, termasuk target dan kinerja di bidang ekonomi, lingkungan, sosial, dan tata kelola keberlanjutan. Dalam penyusunan laporan ini, kami melibatkan pemangku kepentingan dalam proses pengambilan keputusan, khususnya dalam menentukan topik material terkait keberlanjutan.

The Merdeka 2025 Sustainability Report is centered around the theme "Advancing Sustainable Long-Term Value." Through this report, we aim to share insights with our stakeholders on the company's sustainability challenges, opportunities, and strategies, as well as our targets and performance across economic, environmental, social, and governance aspects. In developing this report, we actively engaged stakeholders in the decision-making process, particularly in identifying material topics related to sustainability.

Laporan Keberlanjutan Merdeka diterbitkan setiap tahun. Edisi tahun 2025 ini menyajikan informasi kinerja keberlanjutan untuk periode 1 Januari – 31 Desember 2025. Periode Laporan Keberlanjutan 2025 sesuai dengan periode Laporan Finansial 2025. Tanggal publikasi Laporan Keberlanjutan 2025 adalah 24 April 2026, sesuai dengan penetapan Presiden Direktur. Terdapat pernyataan kembali informasi data energi dan emisi dari aktivitas operasional karena perbaikan metodologi perhitungan. [2-3][2-4]

Merdeka publishes its Sustainability Report annually. The 2025 edition covers our sustainability performance for the period from January 1 to December 31, 2025. The 2025 Sustainability Report reporting period is aligned with the 2025 Financial Reporting period. The publication date of the 2025 Sustainability Report is April 24, 2026, in accordance with the date of approval by the President Director. This report includes a restatement of energy and emission data due to improvement in calculation methodology.

Kami menyusun laporan ini dengan mengacu pada Standar GRI 2021, GRI 14: Mining Sector 2024, Task Force on Climate-related Financial Disclosures (TCFD) serta regulasi nasional, yakni Peraturan Otoritas Jasa Keuangan (POJK) No. 51/POJK.03/2017 tentang Keuangan Berkelanjutan dan Surat Edaran Otoritas Jasa Keuangan (SEOJK) No. 16/SEOJK.04/2021.

This report has been prepared in accordance with GRI Standards 2021, GRI 14: Mining Sector 2024, Task Force on Climate-related Financial Disclosures (TCFD) and national regulations, including Financial Services Authority Regulation (POJK) No. 51/POJK.03/2017 on Sustainable Finance and Financial Services Authority Circular Letter (SEOJK) No. 16/SEOJK.04/2021.

Untuk mempermudah pemahaman pembaca, kami menggunakan istilah "Merdeka", "Perusahaan", dan "Kami" untuk merujuk pada PT Merdeka Copper Gold Tbk. Istilah "site" dan "entitas anak" digunakan untuk menggambarkan wilayah operasional perusahaan.

To make this report easier to understand, we use "Merdeka," "Company," and "We" to refer to PT Merdeka Copper Gold Tbk. The terms "site" and "subsidiary" refer to our operational areas.

Selain itu, istilah lain juga digunakan sebagai berikut:

Additionally, the following terms apply:

- > "BSI" dan "Tambang Emas Tujuh Bukit" – PT Bumi Suksesindo
- > "BKP-BTR" dan "Tambang Tembaga Wetar" – PT Batutua Kharisma Permai dan PT Batutua Tembaga Raya
- > "MTI" – PT Merdeka Tsingshan Indonesia
- > "Pani" dan "Tambang Emas Pani" – PT Merdeka Gold

- > "BSI" and "Tujuh Bukit Gold Mine" – PT Bumi Suksesindo
- > "BKP-BTR" and "Wetar Copper Mine" – PT Batutua Kharisma Permai and PT Batutua Tembaga Raya
- > "MTI" – PT Merdeka Tsingshan Indonesia
- > "Pani" and "Pani Gold Mine" – PT Merdeka Gold Resources Tbk

- Resources Tbk
- > "MBM" – PT Merdeka Battery Materials Tbk
- > "SCM" dan "Tambang Nikel Konawe" – PT Sulawesi Cahaya Mineral
- > "BSID" – PT Bukit Smelter Indonesia
- > "CSID" – PT Cahaya Smelter Indonesia
- > "ZHN" – PT Zhao Hui Nickel
- > "HNMI" – PT Huaneng Metal Industry.

- > "MBM" – PT Merdeka Battery Materials Tbk
- > "SCM" and "Konawe Nickel Mine" – PT Sulawesi Cahaya Mineral
- > "BSID" – PT Bukit Smelter Indonesia
- > "CSID" – PT Cahaya Smelter Indonesia
- > "ZHN" – PT Zhao Hui Nickel
- > "HNMI" – PT Huaneng Metal Industry

Ruang Lingkup Laporan Keberlanjutan 2025

Cakupan Laporan Keberlanjutan Merdeka 2025 adalah seluruh entitas anak, selaras dengan cakupan laporan keuangan konsolidasian, dengan perbedaan terbatas berdasarkan ketersediaan data dan relevansi dampak. Penentuan cakupan dilakukan melalui pelibatan pemangku kepentingan, peninjauan operasi, serta identifikasi dan penilaian dampak ekonomi, lingkungan, sosial, termasuk hak asasi manusia. Daftar entitas anak Merdeka secara lengkap dapat dilihat di [Laporan Tahunan](#). [2-2]

Scope of the 2025 Sustainability Report

The scope of the Merdeka 2025 Sustainability Report covers all subsidiaries, aligned with the scope of the consolidated financial statements, with limited differences based on data availability and impact relevance. The scope is determined through stakeholder engagement, operational review, and the identification and assessment of economic, environmental, and social impacts, including human rights. Details of Merdeka's subsidiaries can be found in [Annual Report](#).

Perusahaan Companies	Lokasi Operasi Operation Locations
PT Bumi Suksesindo (BSI)	Tambang Emas Tujuh Bukit dan Proyek Tembaga Tujuh Bukit, Banyuwangi Tujuh Bukit Gold Mine and Tujuh Bukit Copper Project, Banyuwangi
PT Batutua Kharisma Permai (BKP) PT Batutua Tembaga Raya (BTR)	Tambang Tembaga Wetar, Maluku Barat Daya Wetar Copper Mine, Southwest Maluku
PT Merdeka Gold Resources Tbk	Tambang Emas Pani, Gorontalo Pani Gold Mine, Gorontalo
	Tambang Nikel SCM, Sulawesi Tenggara, Indonesia SCM Nickel Mine, Southeast Sulawesi, Indonesia
PT Merdeka Battery Materials Tbk	Pabrik AIM (Acid, Iron, Metal) MTI, Morowali, Sulawesi Tengah, Indonesia AIM Plant (Acid, Iron, Metal) Project, Morowali, Central Sulawesi, Indonesia
	Pabrik Peleburan Nikel (PT Bukit Smelter Indonesia, PT Cahaya Smelter Indonesia, PT Zhao Hui Nickel), Morowali, Sulawesi Tengah, Indonesia Nickel Smelter, Morowali, Central Sulawesi, Indonesia
	Fasilitas Konversi Nikel Matte (PT Huaneng Metal Industry), Morowali, Sulawesi Tengah, Indonesia Nickel Matte Conversion Facility, Morowali, Central Sulawesi, Indonesia

Asurans Laporan Keberlanjutan

Bagi Merdeka, proses asurans memiliki peran penting dalam memastikan keakuratan informasi yang disampaikan dalam laporan ini, sekaligus meningkatkan kredibilitasnya. Untuk menjamin kualitas Laporan Keberlanjutan, Merdeka menggunakan jasa asurans independen.

Sustainability Report Assurance

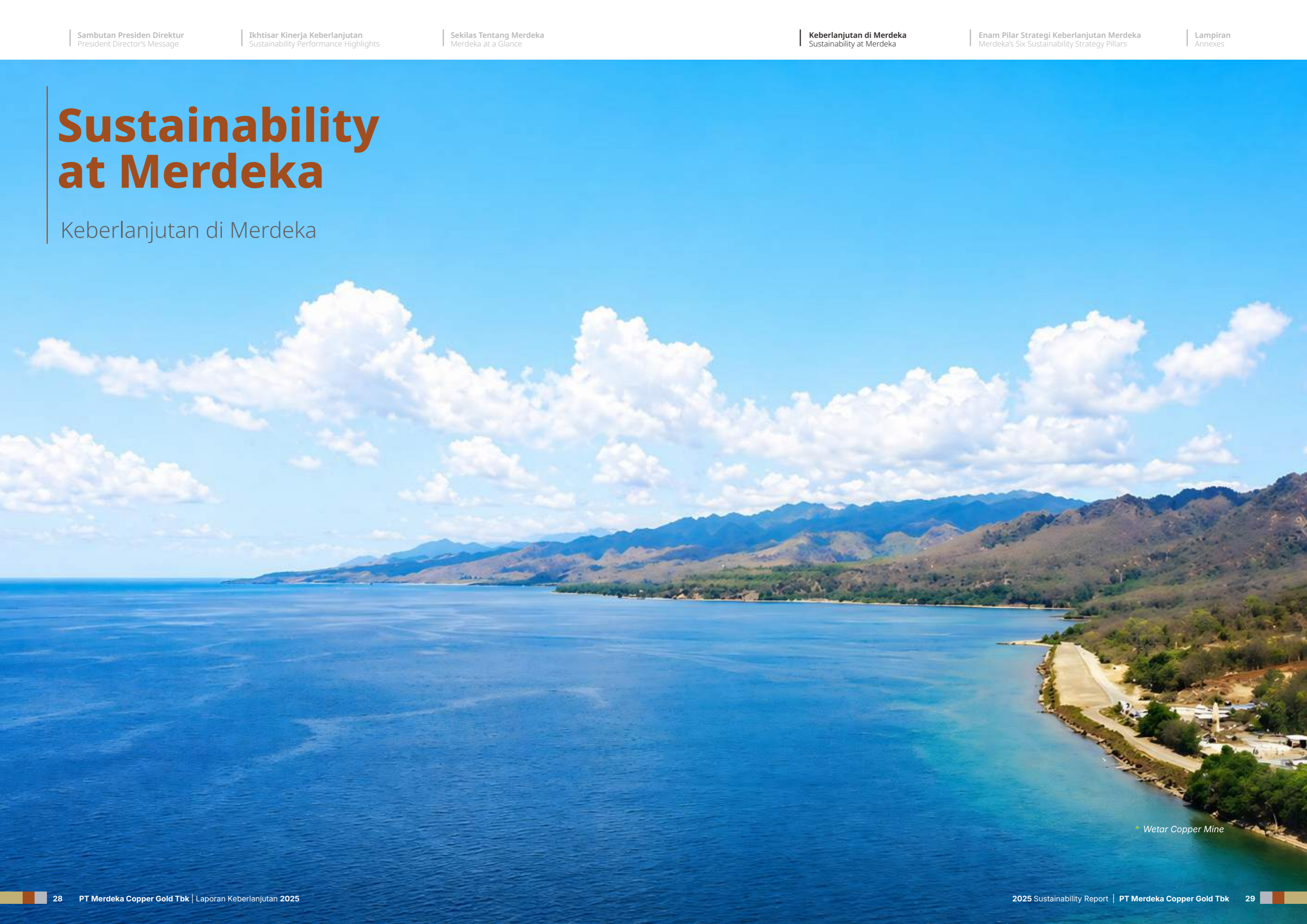
At Merdeka, the assurance process is crucial in ensuring the accuracy of the information presented in this report while also strengthening its credibility. To maintain high reporting standards, we engage an independent assurance provider.

Pada laporan tahun ini, kami menunjuk TUV Rheinland Indonesia, sebuah penyedia jasa asurans independen yang tidak memiliki keterkaitan dengan perusahaan. Pemilihan lembaga asurans dilakukan melalui persetujuan Direksi, dengan mempertimbangkan pengalaman kerja dan kapabilitas lembaga tersebut. Pernyataan asurans independen dapat ditemukan dalam lampiran laporan ini. [2-5][G.1]

For this year's report, we have appointed TUV Rheinland Indonesia, an independent assurance provider with no affiliation to the company. The selection process was conducted with the approval of the Board of Directors, considering the provider's experience and expertise. The independent assurance statement can be found in the appendix of this report.

Sustainability at Merdeka

Keberlanjutan di Merdeka



Wetar Copper Mine

Komitmen dan Kebijakan Kami

Merdeka's Commitment and Policies [2-23]

Merdeka berkomitmen untuk menjalankan seluruh kegiatan bisnis secara berkelanjutan dan bertanggung jawab, dengan tujuan menciptakan nilai bagi pemangku kepentingan serta memberikan dampak positif bagi perekonomian, lingkungan, karyawan, dan masyarakat di sekitar wilayah operasional. Komitmen ini tercermin dalam Kebijakan Keberlanjutan yang telah disetujui oleh Presiden Direktur dan disosialisasikan kepada seluruh karyawan.

Kebijakan Keberlanjutan Merdeka mencakup berbagai aspek, termasuk pelestarian lingkungan hidup, kesehatan dan keselamatan kerja, kepatuhan terhadap standar ketenagakerjaan, penghormatan terhadap hak asasi manusia, keterlibatan dan pengembangan masyarakat, rantai pasok yang bertanggung jawab, serta penerapan tata kelola perusahaan yang baik.

Kami menyadari bahwa kegiatan operasional kami dapat berdampak pada lingkungan sekitar. Oleh karena itu, kami berkomitmen untuk menjalankan operasi dengan standar etika dan lingkungan tertinggi. Kebijakan Keberlanjutan ini menjadi pedoman utama dalam seluruh aktivitas bisnis kami dan terus dikembangkan guna meningkatkan kinerja keberlanjutan perusahaan.

Kebijakan Keberlanjutan Merdeka disusun berdasarkan berbagai instrumen otoritatif global dan nasional, termasuk:

1. United Nations Guiding Principles on Business and Human Rights (UNGPs)
2. Deklarasi ILO tentang Prinsip-Prinsip dan Hak-Hak Mendasar di Tempat Kerja
3. Pedoman Uji Tuntas OECD untuk Bisnis yang Bertanggung Jawab
4. Peraturan Otoritas Jasa Keuangan (OJK) No. 51/POJK.03/2017 tentang Penerapan Keuangan Berkelanjutan bagi Lembaga Jasa Keuangan, Emiten, dan Perusahaan Publik

Komitmen kami terhadap penghormatan hak asasi manusia mencakup seluruh wilayah operasional dan rantai pasokan kami. Hal ini tertuang dalam Kebijakan Hak Asasi Manusia Merdeka, yang mencerminkan komitmen kami dalam melindungi hak individu, termasuk masyarakat di sekitar wilayah operasional, pekerja, serta pihak lain yang terdampak oleh kegiatan perusahaan.

Kebijakan Hak Asasi Manusia Merdeka meliputi:

1. Penghormatan terhadap hak-hak ketenagakerjaan pekerja dan pekerja pemasok
2. Hak atas lingkungan kerja yang aman dan sehat
3. Kebebasan berserikat, perlindungan hak berorganisasi, dan perundingan bersama

Merdeka is committed to running its business activities responsibly and sustainably, creating value for stakeholders while making a positive impact on the economy, environment, employees, and local communities. This commitment is outlined in our Sustainability Policy, which has been approved by the President Director and communicated to all employees.

Merdeka's Sustainability Policy covers various aspects, including environmental conservation, occupational health and safety, labor standards compliance, respect for human rights, community engagement and development, responsible supply chain management, and the implementation of good corporate governance.

We recognize that our operations can impact the surrounding environment. Therefore, we are committed to operating with the highest ethical and environmental standards. This Sustainability Policy serves as the primary guideline for our business activities and is continuously refined to enhance the company's sustainability performance.

Merdeka's Sustainability Policy is developed based on various authoritative global and national instruments, including:

1. United Nations Guiding Principles on Business and Human Rights (UNGPs)
2. ILO Declaration on Fundamental Principles and Rights at Work
3. OECD Due Diligence Guidance for Responsible Business Conduct
4. Financial Services Authority (OJK) Regulation No. 51/POJK.03/2017 on Sustainable Finance Implementation for Financial Institutions, Issuers, and Public Companies

Our commitment to respecting human rights applies across all operational areas and supply chains. This is outlined in Merdeka's Human Rights Policy, which ensures the protection of individual rights, including those of employees, local communities, and others affected by our business activities.

Merdeka's Human Rights Policy includes:

1. Respect for labor rights of employees and suppliers' workers
2. The rights to a safe and healthy work environment
3. Freedom of association, protection of organizational rights, and collective bargaining

4. Pencegahan segala bentuk kerja paksa, pekerja anak, dan perdagangan manusia
5. Penciptaan lingkungan kerja yang beragam dan inklusif, bebas dari diskriminasi

Komitmen kami terhadap hak asasi manusia telah terintegrasi dalam berbagai kebijakan, kode etik dan prosedur, termasuk Kode Etik Perusahaan, Kode Etik Keberlanjutan Pemasok, Kebijakan Lingkungan, Kebijakan Kesehatan dan Keselamatan, Kebijakan Ketenagakerjaan, dan Kebijakan Masyarakat.

Seluruh karyawan di entitas anak Merdeka diwajibkan mengikuti pelatihan Kebijakan dan Kode Etik sebagai bagian dari orientasi perusahaan bagi karyawan baru. Dengan demikian, mereka memahami tanggung jawabnya dalam menghormati hak asasi manusia di lingkungan kerja, sesuai dengan Kebijakan Hak Asasi Manusia Merdeka. Kami juga memastikan bahwa mitra bisnis kami turut menghormati hak asasi manusia dengan memasukkan persyaratan kepatuhan dalam Kode Etik Keberlanjutan Pemasok. [2-24]

Sebagai bukti nyata dari komitmen ini, Merdeka telah menjadi penandatanganan UN Global Compact dan telah menyampaikan Communication on Progress (CoP) kepada Global Compact pada tahun 2025. CoP mencerminkan komitmen perusahaan terhadap transparansi, akuntabilitas, dan penerapan praktik bisnis berkelanjutan. Selain itu, CoP juga menjadi mekanisme utama bagi Merdeka dalam menunjukkan kemajuan terhadap Sepuluh Prinsip UN Global Compact dan Tujuan Pembangunan Berkelanjutan (SDGs).

Untuk memastikan implementasi komitmen keberlanjutan di seluruh rantai pasok, Merdeka telah menyusun Kode Etik Keberlanjutan Pemasok, yang berlaku bagi semua pemasok, termasuk badan usaha, organisasi, atau individu yang menyediakan barang atau jasa kepada perusahaan. Kami berkomitmen untuk bermitra hanya dengan pemasok yang dapat menunjukkan kepatuhan terhadap persyaratan yang tercantum dalam kode etik ini. [2-24]

Kode Etik Keberlanjutan Pemasok mencakup aspek-aspek berikut:

1. Etika bisnis dan integritas
2. Manajemen lingkungan
3. Kesehatan dan keselamatan kerja
4. Kepatuhan terhadap standar ketenagakerjaan
5. Penghormatan terhadap hak asasi manusia
6. Keterlibatan dengan masyarakat sekitar

Secara periodik Merdeka melakukan penyegaran dan sosialisasi Kebijakan Perusahaan melalui email kepada karyawan. Seluruh dokumen Kebijakan dan tata kelola dapat diakses melalui tautan berikut: [Merdeka Copper Gold - Documents](#). [2-24]

4. Prevention of forced labor, child labor, and human trafficking
5. Fostering a diverse, inclusive, and discrimination-free workplace.

We have embedded our human rights commitment into key company policies, codes and procedures, including the Code of Conduct (Code of Ethics), Supplier Sustainability Code of Conduct, Environmental Policy, Health and Safety Policy, Employment Policy, and Community Policy.

All employees within Merdeka's subsidiaries are required to complete Policy and Code of Conduct (Code of Ethics) training as part of the company's orientation program for new employees. This ensures that they understand their responsibilities in respecting human rights within the workplace, in accordance with Merdeka's Human Rights Policy. We also hold our business partners to the same standard by integrating human rights compliance into our Supplier Sustainability Code of Conduct.

As a testament to our dedication, Merdeka is a signatory of the UN Global Compact and submitted its 2025 Communication on Progress (CoP), reinforcing our commitment to transparency, accountability, and sustainable business practices. The CoP serves as our primary tool for demonstrating progress on the Ten Principles of the UN Global Compact and the Sustainable Development Goals (SDGs).

To ensure the implementation of sustainability commitments throughout the supply chain, Merdeka has established the Supplier Sustainability Code of Conduct, which applies to all suppliers, including businesses, organizations, or individuals providing goods or services to the company. We are committed to partnering only with suppliers who comply with the requirements outlined in this code.

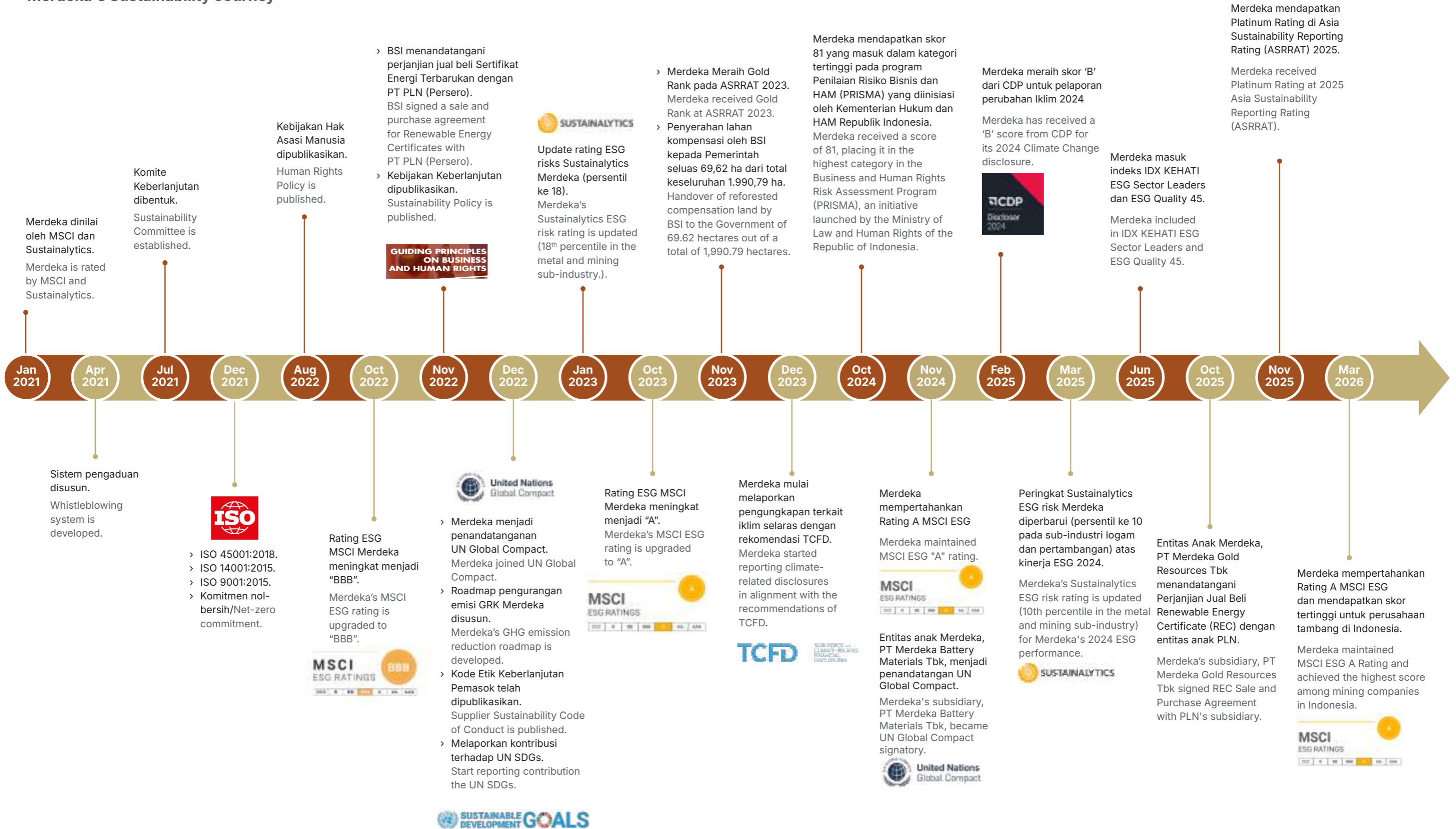
Supplier Sustainability Code of Conduct covers the following aspects:

1. Business ethics and integrity
2. Environmental management
3. Occupational health and safety
4. Compliance with labor standards
5. Respect for human rights
6. Engagement with local communities

Merdeka periodically refreshes and disseminates the Company Policies to employees via email. Merdeka conduct refreshment training All of Merdeka's governance documents and policies can be accessed through the website: [Merdeka Copper Gold - Documents](#).

Perjalanan Keberlanjutan Merdeka

Merdeka's Sustainability Journey



Kerangka Keberlanjutan Merdeka

Merdeka Sustainability Framework [2-22][2-24]

VISI | VISION

Menjadi pemimpin global di industri pertambangan dan logam Indonesia.
The Global Leader in the Indonesian Mining and Metals Industry

MISI | MISSION

- Menjadi mitra pengembang pilihan dalam sektor industri pertambangan dan logam Indonesia.
- Menjadi pemimpin dalam keselamatan, pembangunan berkelanjutan, konservasi lingkungan, dan tanggung jawab sosial perusahaan.
- Menciptakan nilai serta imbal hasil investor yang unggul melalui investasi yang bijaksana dan pengembangan proyek yang efektif.
- Menjadi pemimpin dalam inovasi dan efisiensi.

- > To be the development partner of choice in the Indonesian mining & metals industry.
- > To be a leader in safety, sustainable development, environmental protection & corporate social responsibility.
- > To generate superior value & investor returns through prudent investment and effective project development.
- > To be a leader in innovation and efficiency.

NILAI-NILAI | VALUES

GReAtnESS

Growth, Respect, Accountability, Collaboration, Excellence, Safety & Sustainability

SUSTAINABILITY POLICY

Our commitment to operate in a sustainable and responsible manner, create values for stakeholders, and generate positive impacts on the economy, environment, people, and communities.

MERDEKA'S SUSTAINABILITY STRATEGY



Alignment with SDGs



Pendekatan keberlanjutan Merdeka disusun berdasarkan visi perusahaan untuk menjadi pemimpin global dalam industri pertambangan dan logam, serta misi untuk unggul dalam keselamatan, perlindungan lingkungan, dan tanggung jawab sosial. Nilai-nilai perusahaan menjadi panduan dalam menjalankan bisnis guna mencapai visi dan misi tersebut.

Sejalan dengan visi, misi, dan nilai-nilai Merdeka, Kebijakan Keberlanjutan menegaskan komitmen perusahaan untuk menjalankan bisnis secara berkelanjutan dan bertanggung jawab, menciptakan nilai bagi pemangku kepentingan, serta memberikan dampak positif bagi ekonomi, lingkungan, karyawan, dan masyarakat sekitar.

Untuk mewujudkan komitmen dalam Kebijakan Keberlanjutan, Merdeka merumuskan Enam Pilar Strategi Keberlanjutan yang mencakup area fokus utama perusahaan. Pilar-pilar ini dirancang selaras dengan Tujuan Pembangunan Berkelanjutan (SDGs) dan targetnya, serta mendukung visi, misi, dan nilai-nilai perusahaan. Dengan demikian, Enam Pilar Strategi Keberlanjutan Merdeka bertujuan memberikan kontribusi maksimal bagi pencapaian SDGs.

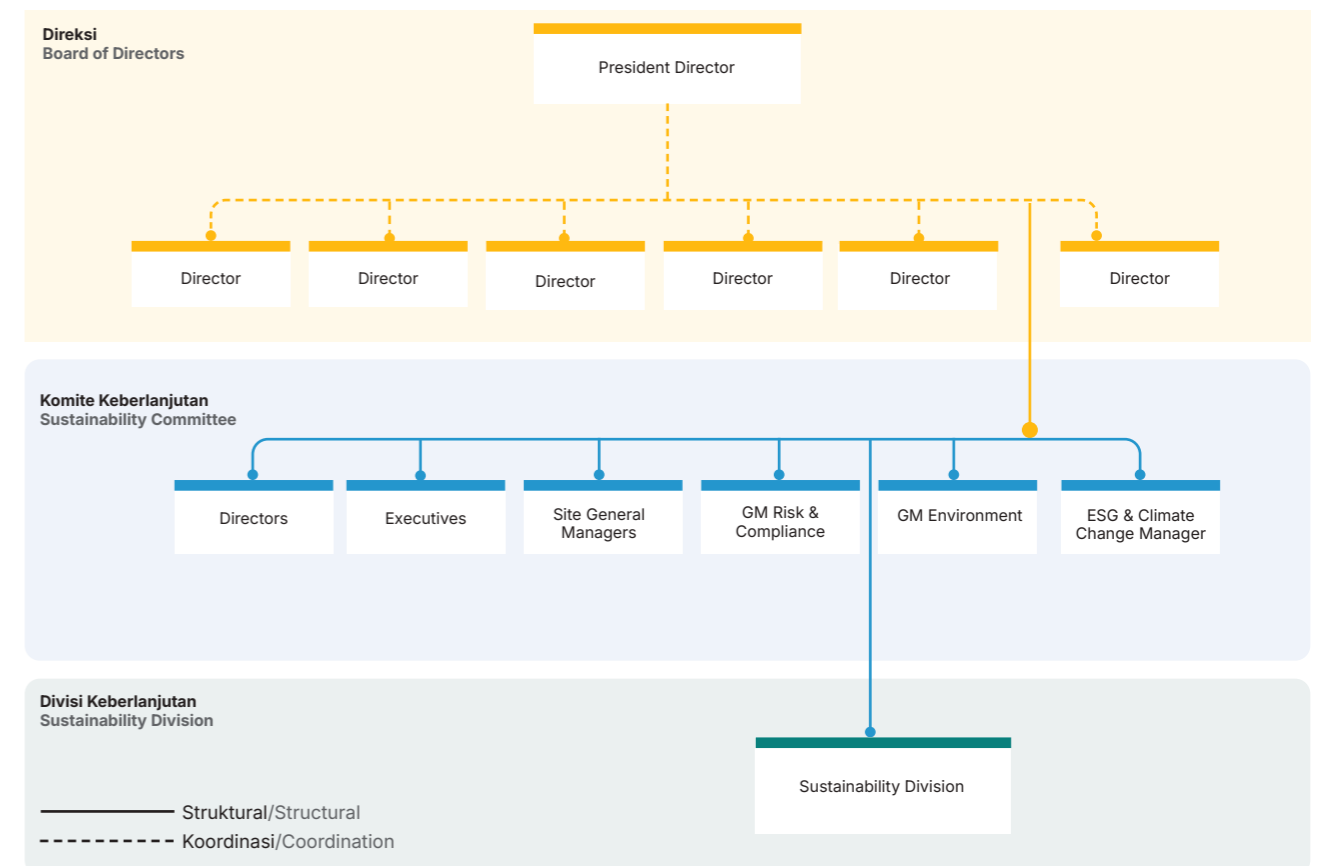
Merdeka's approach to sustainability is rooted in its vision to be a global leader in the mining and metals industry and its mission to excel in safety, environmental stewardship, and social responsibility. The company's core values serve as the foundation for conducting business in a way that drives this vision and mission forward.

Guided by these principles, Merdeka's Sustainability Policy underscores its commitment to responsible and sustainable operations, creating value for stakeholders while making a positive impact on the economy, environment, employees, and local communities.

To turn this commitment into action, Merdeka has established Six Sustainability Strategy Pillars that outline its key focus areas. These pillars are aligned with the United Nations Sustainable Development Goals (SDGs), ensuring that the company's sustainability efforts contribute meaningfully to global priorities while reinforcing its long-term vision, mission, and values.

Tata Kelola Keberlanjutan Merdeka

Merdeka Sustainability Governance [E.1][2-9]



Pengawasan Direksi dan Komite Keberlanjutan

Tanggung Jawab dan Pengawasan [2-12]

Di Merdeka, Direksi bertanggung jawab penuh dalam menetapkan kebijakan, strategi, dan tujuan keberlanjutan perusahaan. Direksi juga mengawasi implementasi kinerja keberlanjutan dan proses peninjauan dampak. Pengawasan ini dilakukan melalui peninjauan laporan berkala dari Komite Keberlanjutan, Komite Manajemen Risiko dan Peluang, Komite Kesehatan dan Keselamatan Kerja, dan Komite Peninjauan Tailing dan Dewan Peninjauan Tailing Independen dalam Rapat Direksi, yang memastikan strategi dan kebijakan keberlanjutan terintegrasi ke seluruh operasional perusahaan.

Komite Keberlanjutan

Untuk mendukung pengambilan keputusan dan pengawasan pelaksanaan keberlanjutan, Direksi membentuk Komite Keberlanjutan yang ditetapkan melalui Piagam Komite Keberlanjutan. Komite ini dipimpin oleh Presiden Direktur, dengan anggota yang terdiri dari Presiden Direktur, Manajemen Eksekutif, General Manager di site, Kepala Teknik Tambang (KTT), General Manager di kantor pusat, dan Manajer ESG & Perubahan Iklim.

Tugas dan Tanggung Jawab Komite Keberlanjutan

Tanggung jawab Komite Keberlanjutan mencakup:

1. Meninjau dan memperbarui Kebijakan Keberlanjutan, strategi, target, dan pedoman keberlanjutan Merdeka.
2. Memantau perkembangan hukum dan regulasi keberlanjutan nasional dan global, standar keberlanjutan, serta tren industri yang relevan. Komite juga memberikan rekomendasi untuk memperbarui strategi, kebijakan, dan target agar selaras dengan standar nasional, internasional, serta praktik terbaik.
3. Mengevaluasi kinerja keberlanjutan secara berkala, termasuk aspek perlindungan lingkungan, kesehatan dan keselamatan kerja, ketenagakerjaan dan HAM, pelibatan serta pengembangan masyarakat, tanggung jawab pemasok, kontraktor, dan mitra bisnis, serta tata kelola perusahaan
4. Meninjau uji tuntas dan proses identifikasi serta pengelolaan dampak operasional terhadap ekonomi, lingkungan, dan masyarakat.
5. Memantau kasus-kasus kontroversial yang berkaitan dengan Kebijakan Keberlanjutan serta memberikan rekomendasi untuk penanganannya.

Keahlian dalam Isu Keberlanjutan [2-13][F.1]

Untuk memastikan pengambilan keputusan yang efektif, Direksi dan Komite Keberlanjutan secara rutin meningkatkan keahlian mereka dalam isu-isu keberlanjutan. Mereka berpartisipasi dalam program pelatihan, seminar, dan diskusi dengan pakar eksternal mengenai tren global, regulasi baru, dan praktik terbaik industri. Selama tahun 2025, anggota Komite Keberlanjutan telah mengikuti berbagai pelatihan tentang ESG, termasuk pelatihan perhitungan cakupan 3 Gas Rumah Kaca (GRK), Prinsip-Prinsip Sukarela mengenai Keamanan dan

Board and Sustainability Committee Oversight

Responsibility and Oversight

At Merdeka, the Board of Directors holds full responsibility for establishing the company's sustainability policies, strategies, and objectives. The Board also oversees the implementation of sustainability performance and the impact review process. This oversight is carried out through the review of regular reports from the Sustainability Committee, Risk and Opportunity Management Committee, Occupational Health and Safety Committee, Tailings Review Committee, and Independent Tailings Review Board, during Board meetings, ensuring that sustainability strategies and policies are integrated across all company operations.

Sustainability Committee

To support decision-making and oversee the execution of sustainability initiatives, the Board has established a Sustainability Committee, formalized through the Sustainability Committee Charter. The committee is led by the President Director and includes key members such as the President Director, Executive Management, Site General Managers, Head of Technical Mining (KTT), Corporate General Managers, and ESG & Climate Change Manager.

Roles and Responsibilities of the Sustainability Committee

The responsibilities of Sustainability Committee include:

1. Reviewing and updating Merdeka's Sustainability Policy, strategy, targets, and guidelines.
2. Monitoring national and global sustainability regulations, standards, and industry trends, and recommending necessary updates to align company policies and targets with national and international standards and best practices.
3. Regularly evaluating sustainability performance across key areas environmental protection, occupational health and safety, labor practices and human rights, community engagement and development, supplier, contractor, and business partner accountability, as well as corporate governance
4. Overseeing due diligence and identification process as well as impact assessments related to the company's economic, environmental, and social footprint.
5. Addressing controversial cases related to the Sustainability Policy and recommending appropriate resolutions.

Expertise in Sustainability Issues

To ensure effective decision-making, the Board of Directors and the Sustainability Committee regularly enhance their expertise on sustainability issues. They participate in training programs, seminars, and discussions with external experts on global trends, new regulations, and industry best practices. During 2025, the Sustainability Committee members have participated in various ESG related training programs, including training on Scope 3 greenhouse gas (GHG) accounting, the Voluntary Principles on Security and Human Rights (VPSHR),

Hak Asasi Manusia (VPSHR), dan Penilaian Daur Hidup. Hasil pelatihan ini dibagikan melalui alih pengetahuan dalam rapat Komite agar seluruh anggota Komite dan Direksi mendapatkan pembaruan isu ESG terkini serta implikasinya terhadap strategi perusahaan.

Peran dalam Mengelola Dampak, Risiko, dan Peluang [2-13] [2-14]

Direksi memainkan peran sentral dalam mengelola dampak, risiko, dan peluang yang terkait dengan keberlanjutan. Melalui pengawasan terhadap Komite Keberlanjutan, Direksi memastikan bahwa dampak ekonomi, lingkungan, dan sosial diidentifikasi, dievaluasi, dan diintegrasikan dalam manajemen risiko perusahaan. Komite bertanggung jawab merumuskan rencana tindak lanjut untuk mitigasi risiko dan pemulihan dampak yang teridentifikasi. Direksi meninjau rencana ini untuk memastikan bahwa risiko keberlanjutan, seperti yang terkait dengan ekonomi, lingkungan, dan sosial, dikelola secara proaktif, sementara peluang keberlanjutan dimanfaatkan untuk menciptakan nilai jangka panjang. Topik-topik material untuk Laporan Keberlanjutan 2025 telah disetujui oleh Direksi.

Divisi Keberlanjutan

Koordinasi pelaksanaan program dan pencapaian target keberlanjutan dilakukan oleh Divisi Keberlanjutan, yang secara berkala menyampaikan laporan kepada salah satu Direktur Merdeka dan kepada Komite Keberlanjutan.

Mekanisme Komunikasi dengan Pemangku Kepentingan [2-16]

Direksi terlibat dalam mekanisme komunikasi dengan pemangku kepentingan, baik secara langsung maupun tidak langsung. Komite Keberlanjutan berfungsi sebagai wadah utama untuk membahas masukan dan pengaduan dari pemangku kepentingan di seluruh operasional perusahaan. Ringkasan hasil diskusi dan masukan tersebut dilaporkan oleh Ketua Komite kepada Direksi dalam Rapat Direksi. Hal ini memastikan bahwa kekhawatiran dan aspirasi pemangku kepentingan ditinjau secara saksama dan menjadi bahan pertimbangan penting dalam perumusan strategi keberlanjutan.

Tanggapan Umpan Balik Laporan Tahun Sebelumnya [G.3]

Kami mengapresiasi seluruh pemangku kepentingan yang telah memberikan tanggapan dan masukan terhadap Laporan Keberlanjutan tahun 2024. Masukan yang diterima terkait dengan kelengkapan informasi penerima manfaat pada Pengembangan dan Pemberdayaan Masyarakat.

Menanggapi hal tersebut, kami telah melengkapi informasi tersebut yang telah diungkapkan dalam Laporan Keberlanjutan tahun 2025. Selain itu, kami juga mempertimbangkan umpan balik dari assesor atas laporan tahun sebelumnya. Merdeka tetap terbuka terhadap kritik dan saran konstruktif untuk mendukung perbaikan di masa mendatang.

and Life Cycle Assessment. The outcomes of these training programs are shared through knowledge transfer sessions in Committee meetings, ensuring that all Committee members and the Board are kept informed of the latest ESG developments and their implications for the Company's strategy.

Role in Managing Impacts, Risks, and Opportunities

The Board of Directors plays a central role in managing the impacts, risks, and opportunities related to sustainability. Through oversight of the Sustainability Committee, the Board ensures that economic, environmental, and social impacts are identified, assessed, and integrated into the company's risk management framework. The Committee is responsible for formulating follow-up plans to mitigate risks and address identified impacts. The Board reviews these plans to ensure that sustainability risks, including those related to economic, environmental, and social factors, are managed proactively, while sustainability opportunities are leveraged to create long-term value. The material topics for the 2025 Sustainability Report have been approved by the Board.

Sustainability Division

The coordination of program implementation and the achievement of sustainability targets is carried out by the Sustainability Division, which regularly reports to one of Merdeka's Directors and to the Sustainability Committee.

Stakeholder Communication Mechanisms

The Board of Directors is involved in communication mechanisms with stakeholders, both directly and indirectly. The Sustainability Committee serves as the main platform for discussing feedback and complaints from stakeholders across the company's operations. Summaries of these discussions and inputs are reported by the Chair of the Committee to the Board during Board meetings. This ensures that stakeholder concerns and aspirations are carefully considered and form an integral part of the sustainability strategy development process.

Response to Feedback on the Previous Year's Report

We appreciate all stakeholders who provided feedback and input on the 2024 Sustainability Report. The feedback received primarily related to the completeness of beneficiary information in the Community Development and Empowerment section.

In response, we have included the requested information in the 2025 Sustainability Report. Additionally, we have taken into account feedback from the assessor of the previous year's report. Merdeka remains open to constructive criticism and suggestions to support continuous improvement in the future.


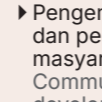
Kontribusi Kami Terhadap Tujuan Pembangunan Berkelanjutan

Our Contribution to the Sustainable Development Goals (SDGs)


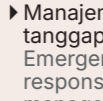
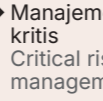
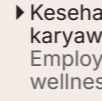
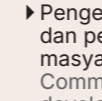
Upaya kami untuk turut berkontribusi terhadap Tujuan Pembangunan Berkelanjutan didukung oleh Enam Pilar Strategi Keberlanjutan Merdeka. Terdapat 11 tujuan SDGs yang menjadi prioritas Merdeka yaitu SDG 1, 3, 4, 5, 6, 8, 12, 13, 15, 16, dan 17.

Our efforts to contribute to the Sustainable Development Goals (SDGs) are supported by our Six Sustainability Strategy Pillars. We have prioritized 11 SDGs goals: SDG 1, 3, 4, 5, 6, 8, 12, 13, 15, 16, and 17.


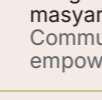
Pengentasan segala bentuk kemiskinan di semua tempat End poverty in all its forms everywhere

-  Pengembangan dan pelatihan karyawan
Employee development and training (p.144)
-  Pelatihan kepemimpinan
Leadership training (p.145-146)
-  Karyawan lokal
Local employees (p.139, 145)
-  Pemberdayaan pemasok lokal
Local supplier empowerment (p.179)
-  Pengembangan dan pemberdayaan masyarakat
Community development and empowerment (p.165)


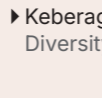
Menggalakkan hidup sehat dan mendukung kesejahteraan untuk semua usia Ensure healthy lives and promote well-being for all at all ages

-  Identifikasi bahaya, penilaian risiko, dan manajemen insiden / Hazard identification, risk assessment, and incident management (p.108)
-  Manajemen tanggap darurat
Emergency response management (p.122)
-  Manajemen risiko kritis
Critical risk management (p.111)
-  Kesehatan karyawan
Employees wellness (p.114)
-  Pengembangan dan pemberdayaan masyarakat
Community development and empowerment (p.165)


Menjamin pendidikan yang inklusif dan setara secara kualitas dan mendukung kesempatan belajar seumur hidup bagi semua Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all

-  Pengembangan dan pelatihan karyawan / Employee development and training (p.144)
-  Pengembangan dan pemberdayaan masyarakat
Community development and empowerment (p.165)


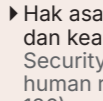
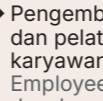
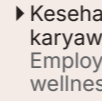
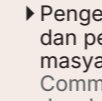
Mencapai kesetaraan gender dan memberdayakan semua perempuan Achieve gender equality and empower all women and girls

-  Anti-diskriminasi dan kesetaraan gender
Anti-discrimination and gender equality (p.138)
-  Keberagaman, kesetaraan, dan inklusivitas
Diversity, equity and inclusion (DEI) (p.135, 138)


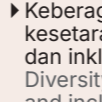
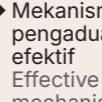
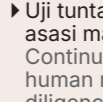
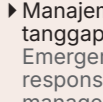
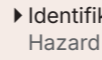
Menjamin akses atas air dan sanitasi untuk semua Ensure availability and sustainable management of water and sanitation for all

-  Tata kelola air dan Efluen
Water stewardship (p.53)


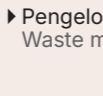
Mempromosikan pertumbuhan ekonomi berkelanjutan dan inklusif, lapangan pekerjaan dan pekerjaan yang layak untuk semua Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all

-  Pelibatan Karyawan dan keamanan
Employee engagement (p.151)
-  Hak asasi manusia dan keamanan
Security and human rights (p. 186)
-  Pengembangan dan pelatihan karyawan
Employee development and training (p.144)
-  Kesehatan karyawan
Employees wellness (p.114)
-  Pengembangan dan pemberdayaan masyarakat
Community development and empowerment (p.165)




-  Pengelolaan risiko kritis
Critical risk management (p.111)
-  Keberagaman, kesetaraan, dan inklusivitas
Diversity, equity and inclusion (DEI) (p.135, 138)
-  Mekanisme pengaduan yang efektif
Effective grievance mechanism (p. 156, 164)
-  Uji tuntas hak asasi manusia
Continuous human rights due diligence (p. 184)
-  Manajemen tanggap darurat
Emergency response management (p. 122)
-  Identifikasi bahaya, penilaian risiko, dan manajemen insiden
Hazard identification, risk assessment, and incident management (p.108)

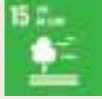
Memastikan pola konsumsi dan produksi yang berkelanjutan Ensure sustainable consumption and production patterns

-  Rantai pasokan yang bertanggungjawab
Responsible supply chain (p. 203)
-  Pengelolaan limbah
Waste management (p. 62)


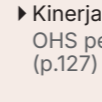
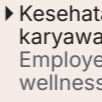
Mengambil langkah penting untuk melawan perubahan iklim dan dampaknya Take urgent action to combat climate change and its impacts

-  Emisi gas rumah kaca (GRK)
Greenhouse gas emission (p. 86)

Mengelola hutan secara berkelanjutan, melawan perubahan lahan menjadi gurun, menghentikan dan merehabilitasi kerusakan lahan, menghentikan kepunahan keanekaragaman hayati Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss

-  Reklamasi dan keanekaragaman hayati
Reclamation and biodiversity management (p. 93)

Mendorong masyarakat adil, damai, dan inklusif Promote peaceful and inclusive societies

-  Menerapkan Kode Etik, Kebijakan Anti Korupsi dan Kebijakan Anti Penyuapan
Implementing Code of Conduct, Anti-Corruption Policy and Anti-Bribery Policy (p.200)
-  Kinerja K3
OHS performance (p.127)
-  Kesehatan karyawan
Employees wellness (p.114)

Menghidupkan kembali kemitraan global demi pembangunan berkelanjutan Strengthen the means of implementation and revitalize the global partnership for sustainable development

-  Berpartisipasi pada inisiatif-inisiatif global (Menjadi anggota UN Global Compact)
Global initiatives participation (Joined UN Global Compact) (p.40, 188)

Merdeka dan UN Global Compact

Our Contribution to the Sustainable Development Goals (SDGs)



Sebagai penandatanganan UN Global Compact, Merdeka berkomitmen mematuhi 10 prinsip UNGC terkait tanggung jawab mendasar di bidang hak asasi manusia, ketenagakerjaan, lingkungan hidup, dan anti korupsi.

As a signatory of the UN Global Compact, Merdeka is committed to the 10 principles of UNGC, which highlight fundamental responsibilities in the areas of human rights, labor, environment, and anti-corruption.



Hak Asasi Manusia Human Rights

PRINSIP 1
PRINCIPLE 1 Mendukung dan menghormati hak asasi manusia
Support and respect human rights

PRINSIP 2
PRINCIPLE 2 Tidak terlibat dalam pelanggaran hak asasi manusia
No human rights abuses

Our works

Menghormati Hak Asasi Manusia
Respecting Human Rights

p.168

Menghormati dan mematuhi hukum nasional terkait dengan hak asasi manusia dan konvensi internasional tentang hak asasi manusia
Respect and comply with local laws and international principles regarding to human rights

Hak asasi manusia pada Kode Etik Keberlanjutan Pemasok
Respect human rights in our Supplier Sustainability Code of Conduct

Pelatihan penghormatan hak asasi manusia kepada personil keamanan
Human rights respect training for security personnel

Menindak lanjuti hasil Human Rights Impact Assessment
Following up on the results of Human Rights Impact Assessment (HRIA)

Menyusun mekanisme penyampaian keluhan tingkat operasional
Developed an operational-level grievance mechanism



Ketenagakerjaan Labor

PRINSIP 3
PRINCIPLE 3 Kebebasan berserikat
Freedom of association

PRINSIP 4
PRINCIPLE 4 Penghapusan kerja paksa
Elimination of forced labor

PRINSIP 5
PRINCIPLE 5 Penghapusan pekerja anak
Abolition of child labor

PRINSIP 6
PRINCIPLE 6 Penghapusan diskriminasi pekerjaan dan jabatan
Elimination of discrimination in respect of employment and occupation

Our works

Memberdayakan Pekerja Kami
Empowering Our People

p. 122

Melindungi hak-hak karyawan
Protect the rights of employees

Memberikan kesempatan karyawan untuk bergabung dalam serikat pekerja
Grant employees the right to join labor union

Keberagaman tenaga kerja
Workforce diversity

Melaksanakan rekrutmen yang adil dan berkualitas
Conduct fair and quality recruitment



Lingkungan Environment

PRINSIP 7
PRINCIPLE 7 Pencegahan terhadap permasalahan lingkungan
Precautionary approach to environmental challenges

PRINSIP 8
PRINCIPLE 8 Tanggungjawab terhadap lingkungan
Environmental responsibility

PRINSIP 9
PRINCIPLE 9 Teknologi ramah lingkungan
Environmentally friendly technologies

Our works

Melestarikan Lingkungan
Preserving the Environment

p.48

Kepatuhan terhadap peraturan lingkungan yang berlaku
Compliance with applicable environmental regulations

Pemantauan terhadap risiko lingkungan untuk mencegah dampak negatif
Monitoring environmental risks to prevent negative impact

Penggunaan sumber daya secara efisien untuk melestarikan sumber daya alam
Efficiently use of resources to preserve natural resources

Menggunakan energi yang berasal dari sumber energi baru terbarukan
Using energy from new renewable energy sources

Identifikasi risiko pada keanekaragaman hayati dan menghindari beroperasi di area dengan nilai keanekaragaman hayati tinggi atau spesies terancam
Identify risks to biodiversity and avoid operating in areas with diversity values



Anti Korupsi Anti-Corruption

PRINSIP 10
PRINCIPLE 10 Melawan segala bentuk korupsi
Work against corruption

Our works

Mengadopsi Tata Kelola Perusahaan yang Baik
Adopting Good Corporate Governance

p.189

Sosialisasi Kebijakan Anti Korupsi
Dissemination of Anti-Corruption Policy

Penilaian potensi tindakan korupsi
Assessment of potential corrupt acts

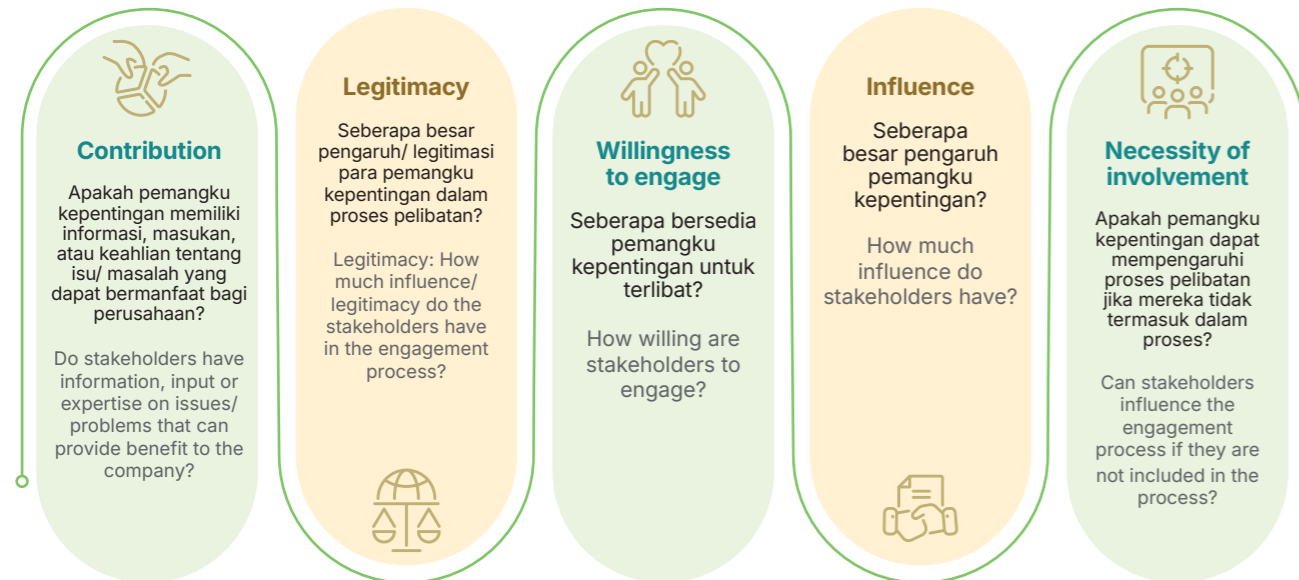
Pelibatan Pemangku Kepentingan

Stakeholder Engagement [2-29] [E.4]

Kami menyadari bahwa pemangku kepentingan memiliki peran penting dalam mewujudkan keberlanjutan perusahaan. Oleh karena itu, Merdeka senantiasa melibatkan pemangku kepentingan yang relevan dalam setiap proses pengambilan keputusan. Pelibatan ini menjadi sarana untuk memahami perspektif dan harapan mereka terkait dampak ekonomi, lingkungan, dan sosial.

Sejalan dengan AA1000 Stakeholder Engagement Standard 2015, kami secara berkelanjutan memantau perkembangan pasar dan interaksi eksternal untuk mengidentifikasi pemangku kepentingan. Identifikasi dilakukan berdasarkan atribut dependency, responsibility, tension, influence, diverse perspectives, dan proximity. Setelah pemangku kepentingan teridentifikasi, kami melakukan pemetaan guna menentukan metode dan frekuensi pelibatan serta topik material yang dianggap penting dan selaras dengan strategi perusahaan.

Adapun kriteria yang digunakan Merdeka dalam pemetaan pemangku kepentingan adalah sebagai berikut:



Berdasarkan hasil pemetaan prioritas pemangku kepentingan, kami melakukan pelibatan pemangku kepentingan pada tahun 2025 melalui berbagai metode sebagai berikut:

We recognize that stakeholders play a vital role in driving the company's sustainability efforts. That's why Merdeka actively engages relevant stakeholders in decision-making processes, ensuring their perspectives and expectations on economic, environmental, and social impacts are considered.

Following the AA1000 Stakeholder Engagement Standard 2015, we continuously track market trends and external interactions to identify key stakeholders. This process is guided by factors such as dependency, responsibility, tension, influence, diverse perspectives, and proximity. Once identified, we map stakeholders to determine the most effective engagement methods, frequency, and key material topics that align with our strategy.

Merdeka's stakeholder mapping is based on the following criteria:

Based on the stakeholder prioritization mapping, we engaged stakeholders in 2025 through various methods, including:

Pemangku kepentingan Stakeholders	Topik material Material topics	Respons perusahaan atas topik material dan frekuensi pelibatan Company's responses to the material topics and engagement frequency
<p>Masyarakat sekitar termasuk kelompok rentan Community including vulnerable groups</p>	<ul style="list-style-type: none"> Pengembangan dan pemberdayaan masyarakat Kesehatan dan keselamatan kerja Kinerja keuangan dan kontribusi ekonomi Hak asasi manusia Pengadaan lokal <p>> Community development and empowerment > Occupational health and safety > Financial performance and economic contribution > Human rights > Local procurement</p>	<ul style="list-style-type: none"> Sosialisasi dampak lingkungan kepada masyarakat Koordinasi dan dialog sosial dengan masyarakat Menerima masukan/ keluhan masyarakat Implementasi program pengembangan dan pemberdayaan masyarakat <p>Frekuensi: minimal sekali setahun</p> <p>> Dissemination of environmental impacts to communities > Coordination and social dialog with communities > Receiving community input / grievances > Implementation of the community development and empowerment programs Frequency: minimum once a year</p>
<p>Karyawan, anak usaha dan serikat pekerja Employee, business units and labour union</p>	<ul style="list-style-type: none"> Kesehatan dan keselamatan kerja Kinerja keuangan dan kontribusi ekonomi Keberagaman, kesetaraan dan inklusi Pengembangan dan pelatihan karyawan <p>> Occupational health and safety > Financial performance and economic contribution > Diversity, equity and inclusion > Employee training and development</p>	<ul style="list-style-type: none"> Sistem pelaporan pelanggaran Konsultasi dan negosiasi Peraturan Perusahaan (PP) dan/atau Perjanjian Kerja Bersama (PKB) Bipartit meeting antara perusahaan dengan serikat pekerja Survei keterikatan karyawan <p>Frekuensi: minimal sekali per semester</p> <p>> Whistleblowing system > Consultation and negotiation of company regulations and/or collective labor agreement > Bipartit meeting between companies and labor unions > Employee engagement survey Frequency: minimum once per semester</p>
<p>Pemegang saham/ pemberi modal Shareholders/ investors</p>	<ul style="list-style-type: none"> Kinerja keuangan dan kontribusi ekonomi Kesehatan dan keselamatan kerja Memelihara lingkungan hidup Etika bisnis dan integritas Tata kelola perusahaan Pengelolaan risiko dan peluang <p>> Financial performance and economic contribution > Occupational health and safety > Preserving the environment > Business ethics and integrity > Corporate governance > Risk and opportunity management</p>	<ul style="list-style-type: none"> Publikasi laporan tahunan, laporan keuangan dan Laporan Keberlanjutan Rapat Umum Pemegang Saham (RUPS) <p>Frekuensi: minimal sekali setahun</p> <p>> Publication of annual report, financial report and Sustainability Report > Annual General Meeting Shareholders (AGMS) Frequency: minimum once a year</p>
<p>Pemerintah Government</p>	<ul style="list-style-type: none"> Kinerja keuangan dan kontribusi ekonomi Memelihara lingkungan hidup Pengadaan lokal Etika bisnis dan integritas Tata kelola perusahaan <p>> Financial performance and economic contribution > Preserving the environment > Local procurement > Business ethics and integrity > Corporate governance</p>	<ul style="list-style-type: none"> Paparan publik Pelaporan rutin kepada kementerian dan dinas terkait dan otoritas jasa keuangan <p>Frekuensi: minimal sekali per semester</p> <p>> Public expose > Regular reporting to related ministries and agencies and the financial services authority Frequency: minimum once per semester</p>
<p>Rantai Pasokan Supply Chain</p>	<ul style="list-style-type: none"> Rantai pasokan yang bertanggung jawab Etika bisnis dan integritas <p>> Responsible supply chain > Business ethics and integrity</p>	<ul style="list-style-type: none"> Pemberian informasi penyelenggaraan tender secara terbuka dan transparan Sosialisasi Contractor Management System (CMS) Koordinasi rutin dengan pemasok <p>Frekuensi: minimal sekali setahun</p> <p>> Provision of information related to the tenders in an open and transparent manner > Contractor Management System (CMS) socialization > Regular coordination with contractors Frequency: minimum once a year</p>

Pemangku kepentingan Stakeholders	Topik material Material topics	Respons perusahaan atas topik material dan frekuensi pelibatan Company's responses to the material topics and engagement frequency
 Masyarakat Sipil/ Civil Society/ NGOs	<ul style="list-style-type: none"> Pemberdayaan dan pengembangan masyarakat Hak asasi manusia Memelihara lingkungan hidup 	<ul style="list-style-type: none"> Sosialisasi dampak sosial, lingkungan dan hak asasi manusia Kerja sama Pengembangan dan Pemberdayaan Masyarakat (PPM) Frekuensi: minimal sekali setahun > Dissemination of social, environment and human rights impact > Collaboration on the community empowerment and development Frequency: minimum once a year
 Media	<ul style="list-style-type: none"> Kinerja keuangan dan kontribusi ekonomi Pemberdayaan dan pengembangan masyarakat Memelihara lingkungan hidup 	<ul style="list-style-type: none"> Rilis media dan konferensi pers Kunjungan media Media <i>monitoring</i> Frekuensi: minimal sekali setahun > Media release and press conference > Media visit > Media monitoring Frequency: minimum once a year
	<ul style="list-style-type: none"> Financial performance and economic contribution Community development and empowerment Preserving the environment 	

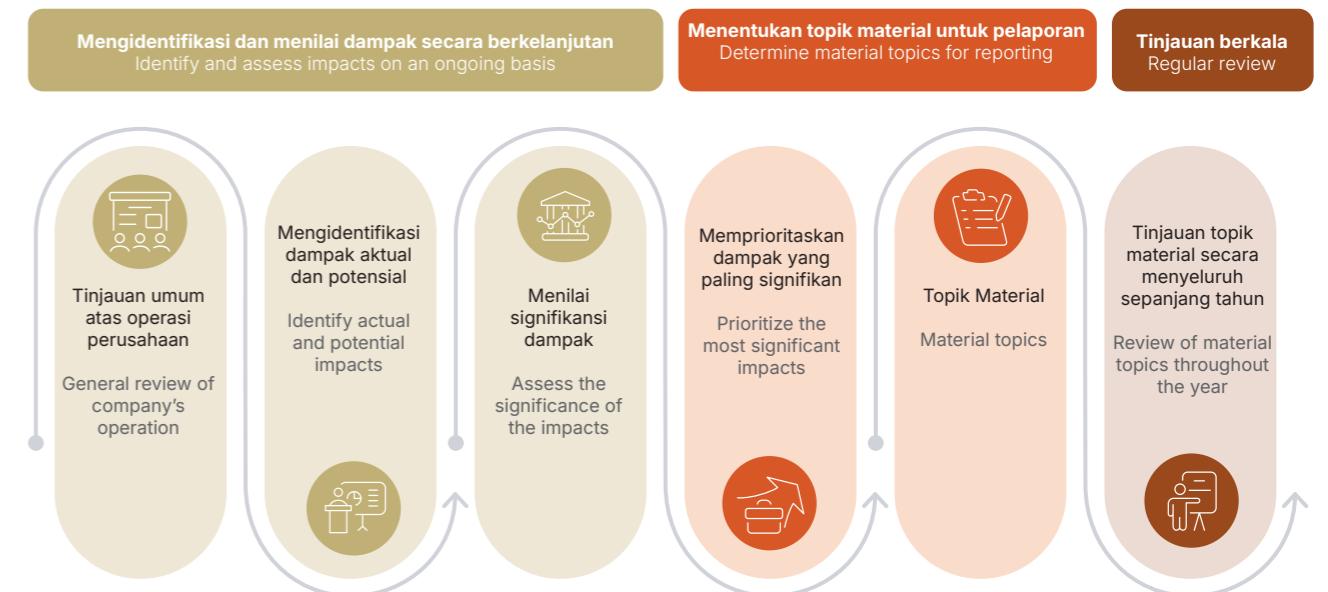


▲ Stakeholder engagement with government officials

Penentuan Topik Material Material Topic Determination [3-1]

Kami menyusun Laporan Keberlanjutan ini berdasarkan topik material hasil dari pelaksanaan materiality assessment yang melibatkan para pemangku kepentingan. Topik material adalah isu-isu yang mencerminkan dampak signifikan perusahaan terhadap ekonomi, lingkungan, tata kelola dan sosial, termasuk hak asasi manusia. Secara keseluruhan, proses penentuan topik-topik material yang dilaporkan dalam Laporan Keberlanjutan Merdeka adalah sebagai berikut:

We have prepared this Sustainability Report based on material topics identified through a materiality assessment involving stakeholders. Material topics are issues that reflect the company's significant economic, environmental, governance, and social, including human rights. Overall, the process of determining the material topics reported in Merdeka's Sustainability Report is as follows:



1. Peninjauan Umum Operasi Perusahaan

Langkah awal dalam proses penentuan topik material dimulai dengan melakukan peninjauan menyeluruh terhadap operasi perusahaan. Tinjauan ini mencakup seluruh kegiatan operasional, hubungan bisnis, pemangku kepentingan, serta sektor usaha yang dijalankan. Melalui proses peninjauan menyeluruh tersebut, diperoleh pemahaman awal mengenai dampak aktual maupun potensial yang ditimbulkan perusahaan terhadap aspek ekonomi, lingkungan, dan sosial, termasuk dampaknya terhadap hak asasi manusia.

Merdeka mengacu pada GRI 14: Sektor Pertambangan 2024, United Nations Guiding Principles on Business and Human Rights (UNGPs), Sepuluh Prinsip UN Global Compact, SDGs, dan POJK 51/2017 sebagai dasar identifikasi potensi dampak tersebut. Selain itu, proses identifikasi dampak juga mempertimbangkan laporan dari rating ESG MSCI dan laporan rating risiko ESG Sustainalytics.

1. Company Operations Review

The initial step in determining material topics begins with a comprehensive review of the company's operations. This review covers all operational activities, business relationships, stakeholders, and business sectors in which the company is engaged. Through this thorough review, an initial understanding is obtained of the actual and potential impacts the company may have on economic, environmental, and social aspects, including its impacts on human rights.

Merdeka refers to GRI 14: Mining Sector 2024, the United Nations Guiding Principles on Business and Human Rights (UNGPs), the Ten Principles of the UN Global Compact, SDGs, and POJK 51/2017 as the basis for identifying potential impacts. In addition, the impact identification process also takes into account reports from MSCI ESG Ratings and Sustainalytics ESG Risk Ratings.

2. Identifikasi Dampak Potensial dan Aktual

Tahap selanjutnya adalah mengidentifikasi dampak potensial dan aktual perusahaan terhadap ekonomi, lingkungan, dan sosial, termasuk hak asasi manusia, berdasarkan hasil Analisis Mengenai Dampak Lingkungan Hidup (AMDAL), penilaian dampak lingkungan dan sosial oleh pihak independen, penilaian dampak terhadap hak asasi manusia (HRIA), risk register, audit sertifikasi ISO 14001:2015 dan ISO 45001:2018, serta laporan keluhan masyarakat.

Proses identifikasi dampak potensial dan aktual juga dilakukan melalui pelibatan pemangku kepentingan antara lain wawancara Manajer Divisi Lingkungan, Hubungan Eksternal, Kesehatan dan Keselamatan Kerja, Sumber Daya Manusia, Supply Chain Management, karyawan dan karyawan kontraktor dan masyarakat lokal terdampak termasuk kelompok rentan.

3. Penilaian Dampak yang Signifikan

Setelah proses identifikasi dampak potensial dan aktual dilaksanakan, Merdeka melakukan penilaian terhadap signifikansi dampak ekonomi, lingkungan, dan sosial, termasuk dampak terhadap hak asasi manusia, dengan mempertimbangkan tingkat keparahan (*severity*) serta kemungkinan terjadinya dampak (*likelihood*).

Penilaian tingkat keparahan (*severity*) didasarkan pada sejumlah kriteria, yaitu skala dampak, ruang lingkup dampak, serta tingkat kesulitan dalam upaya pemulihan. Penilaian atas kemungkinan terjadinya dampak (*likelihood*) mempertimbangkan riwayat insiden serupa, keberadaan kelompok rentan yang terdampak, serta kelengkapan sistem dan prosedur yang diterapkan untuk mencegah dan memitigasi dampak tersebut.

Proses penilaian dampak aktual dan potensial yang signifikan dilakukan melalui pelibatan pemangku kepentingan antara lain wawancara dengan Manajer Divisi Lingkungan, Hubungan Eksternal, Kesehatan dan Keselamatan Kerja, Sumber Daya Manusia, Supply Chain Management, karyawan dan karyawan kontraktor dan masyarakat terdampak termasuk kelompok rentan.

4. Penentuan Topik Material

Pada tahap terakhir, kami menyusun topik material berdasarkan prioritas dampak signifikan ekonomi, lingkungan, dan sosial, termasuk hak asasi manusia, yang akan dilaporkan dalam Laporan Keberlanjutan tahun 2025.

Daftar topik material yang telah disusun kemudian disampaikan kepada Komite Keberlanjutan untuk mendapatkan persetujuan. Komite Keberlanjutan kemudian menyampaikan daftar topik material kepada Presiden Direktur sebagai badan tata kelola tertinggi, untuk mendapatkan persetujuan akhir. [2-14]

2. Identification of Actual and Potential Impacts

The next step involves identifying the company's potential and actual impacts on the economy, environment, and society, including human rights. This identification is based on the results of the Environmental Impact Assessment, independent environmental and social impact assessments, Human Rights Impact Assessments (HRIA), the company's risk register, ISO 14001:2015 and ISO 45001:2018 certification audits, and community grievance reports.

The identification process also includes stakeholder engagement, such as interviews with the Managers of the Environment, External Relations, Occupational Health and Safety, Human Resources, and Supply Chain Management Divisions, as well as employees, contractor workers, and affected local communities, including vulnerable groups.

3. Assessment of Significant Impacts

After identifying the potential and actual impacts, Merdeka assesses the significance of economic, environmental, and social impacts including those related to human rights by evaluating their severity and likelihood.

Severity is assessed based on several criteria: the scale of the impact, the scope of the impact, and the difficulty of remediation. The likelihood of the impact is evaluated based on the history of similar incidents, the presence of affected vulnerable groups, and the robustness of existing systems and procedures to prevent and mitigate the impact.

This assessment of significant actual and potential impacts is also conducted through stakeholder engagement, including interviews with Managers of the Environment, External Relations, Occupational Health and Safety, Human Resources, and Supply Chain Management Divisions, as well as employees, contractor workers, and affected communities including vulnerable groups.

4. Determination of Material Topics

In the final stage, material topics are determined based on the prioritization of significant economic, environmental, and social impacts including human rights impacts which will be disclosed in the 2025 Sustainability Report.

The compiled list of material topics is then submitted to the Sustainability Committee for approval. The Committee subsequently forwards the list to the President Director, as the highest governance body, for final approval.

5. Tinjauan Berkala

Untuk memastikan relevansi dan keakuratan topik material, kami akan meninjau topik material secara berkala, termasuk langkah 1-3, dan menginformasikan setiap usulan pembaruan atau perubahan kepada Komite Keberlanjutan untuk mendapatkan masukan dan persetujuan.




Berdasarkan proses penentuan topik material di atas, berikut adalah daftar topik material keberlanjutan Merdeka: [3-2]

5. Periodic Review

To ensure continued relevance and accuracy, we will conduct periodic reviews of material topics, including steps 1-3, and present any proposed updates or changes to the Sustainability Committee for feedback and approval.

Based on the process of determining material topics outlined above, the following is a list of Merdeka's material sustainability topics.

**Topik Material
Material Topics**

 Environmental Lingkungan	 Social Sosial	 Governance Tata Kelola
1 Pengelolaan energi Energy management	8 Kesehatan dan keselamatan kerja (K3) Occupational health and safety (OHS)	15 Etika bisnis dan integritas Business ethics and integrity
2 Perubahan iklim Climate change	9 Pengembangan dan pelatihan karyawan Employee training and development	16 Rantai pasokan yang bertanggung jawab Responsible supply chain
3 Air dan air limbah Water and wastewater	10 Keberagaman, kesetaraan dan inklusi Diversity, equity and inclusion (DEI)	17 Pengelolaan risiko dan peluang Risk and opportunity management
4 Pengelolaan limbah Waste management	11 Pengadaan lokal Local procurement	
5 Reklamasi lahan dan penutupan tambang Land reclamation and site closure	12 Kinerja keuangan dan kontribusi ekonomi Financial performance and economic contribution	
6 Pelestarian keanekaragaman hayati Biodiversity preservation	13 Pengembangan dan pemberdayaan masyarakat Community development and empowerment	
7 Emisi udara Toxic emissions	14 Hak asasi manusia Human rights	

Pada tahun 2025, terdapat perbedaan topik material yang dilaporkan dibanding tahun sebelumnya. Topik-topik material yang dilaporkan tetap mencerminkan dampak signifikan perusahaan terhadap ekonomi, lingkungan, dan sosial, serta sejalan dengan perkembangan dan prioritas keberlanjutan yang telah ditetapkan oleh perusahaan.

In 2025, there were changes in the material topics reported compared to the previous year. The reported material topics continue to reflect the Company's significant impacts on economic, environmental, and social aspects, and remain aligned with the sustainability developments and priorities established by the Company.

Preserving the Environment

Melestarikan Lingkungan



Nursery at BSI

Memelihara Lingkungan

Preserving the Environment

Pendekatan Manajemen Kami

Aktivitas pertambangan dan pengolahan mineral memberikan dampak terhadap komponen lingkungan biotik dan abiotik pada seluruh tahapan proses, mulai dari eksplorasi, pengembangan, penambangan, penutupan tambang dan reklamasi lahan bekas tambang, hingga pengolahan, transportasi, dan penyimpanan.

Merdeka mengadopsi standar ISO 14001:2015 sebagai pedoman dalam pengembangan dan penerapan sistem manajemen lingkungan. Melalui penerapan standar ini, Merdeka melakukan identifikasi dan pengelolaan risiko untuk mencegah dampak negatif terhadap lingkungan, serta memastikan bahwa pengelolaan lingkungan dilaksanakan sesuai dengan ketentuan peraturan perundang-undangan yang berlaku di Indonesia dan standar internasional, termasuk ISO 14001:2015.

Merdeka memiliki Kebijakan Lingkungan yang merupakan komitmen dari pimpinan tertinggi perusahaan dan disusun sesuai dengan persyaratan ISO 14001:2015. Kebijakan Lingkungan Merdeka diterapkan di kantor pusat, seluruh entitas anak yang berada di bawah kendali Merdeka, serta mitra bisnis, dan disosialisasikan kepada seluruh karyawan melalui email. Merdeka melakukan tinjauan manajemen lingkungan secara berkala, yaitu satu kali dalam setahun. Kebijakan Lingkungan Merdeka mencakup seluruh aspek lingkungan utama, termasuk perubahan iklim dan emisi gas rumah kaca, konservasi air, pengelolaan limbah, pengelolaan tailing, pengelolaan limbah bahan berbahaya dan beracun, reklamasi dan keanekaragaman hayati. Kebijakan Lingkungan Merdeka dan kebijakan lingkungan komprehensif lainnya di seluruh area utama dapat diakses di: [Kebijakan Lingkungan](#) dan [Merdeka Copper Gold - Documents](#).

Kebijakan lingkungan diterapkan melalui Manual Sistem Manajemen Lingkungan yang disusun secara khusus untuk mengelola berbagai aspek dan dampak lingkungan di seluruh area operasional kami. Manual tersebut dilengkapi dengan prosedur, instruksi kerja, dan formulir pendukung guna memastikan penerapan yang efektif serta terintegrasi.

Merdeka menugaskan General Manajer Lingkungan kantor pusat dan Kepala Teknik Tambang (KTT) atau General Manager entitas anak untuk memastikan efektifitas pelaksanaan kebijakan, tujuan, target dan program lingkungan. Secara periodik, General Manajer Lingkungan dan Kepala Teknik Tambang atau General Manager entitas anak melaporkan hasil pelaksanaan kebijakan lingkungan, tujuan, target dan program lingkungan kepada Direksi yang selanjutnya akan menjadi bahan untuk melakukan evaluasi dan penyusunan strategi lingkungan.

Our Management Approach

Mining and mineral processing activities impact both biotic and abiotic environmental components throughout all stages of the process, from exploration, development, mining, mine closure, and reclamation of former mining sites, to processing, transportation, and storage.

Merdeka has adopted ISO 14001:2015 as a guideline for the development and implementation of its environmental management system. Through the implementation of this standard, Merdeka conducts risk identification and management to prevent adverse environmental impacts, and ensures that environmental management is carried out in compliance with applicable laws and regulations in Indonesia as well as international standards, including ISO 14001:2015.

Merdeka has an Environmental Policy that represents a commitment from the company's top leadership and is formulated in accordance with the requirements of ISO 14001:2015. Merdeka's Environmental Policy is implemented at the head office, across all subsidiaries under Merdeka's control, and among business partners, and is communicated to all employees via email. Merdeka conducts periodic environmental management reviews, which are carried out once a year. Merdeka's Environmental Policy covers all key environmental aspects, including climate change and greenhouse gas emissions, water conservation, waste management, tailings management, hazardous and toxic waste management, reclamation, and biodiversity. Merdeka's Environmental Policy and other comprehensive environmental policies across all key areas can be accessed at: [Environmental Policy](#) and [Merdeka Copper Gold - Documents](#).

Environmental policies are implemented through an Environmental Management System Manual specifically designed to manage various environmental aspects and impacts across all our operational areas. The manual is supplemented with procedures, work instructions, and supporting forms to ensure effective and integrated implementation.

Merdeka assigns the head office Environmental General Manager and Head of Technical Mining or General Manager of the subsidiaries to ensure the effective implementation of environmental policies, objectives, targets, and programs. Periodically, the General Manager of Environment and the Head of Technical Mining or General Manager of the subsidiary report the results of the implementation of environmental policies, objectives, targets, and programs to the Board of Directors, which will then serve as the basis for conducting evaluations and formulating environmental strategies.

2025 Performance

Management system

One hundred percent (100%) of Merdeka's business units have obtained ISO 14001:2015 certificates

Water and wastewater

- 1,067.18 megaliters of water recycled and 8,573.03 megaliters of water reused at BSI
- 41.62 megaliters of water recycled at SCM
- 176.39 megaliters of water recycled at MTI

Hazardous and non-hazardous waste

- 4% utilization (36 tonnes) used oil (hazardous waste) for ANFO mine blasting and 100% (114.56 tonnes) non-hazardous waste recycled and reused at BSI
- 93% (923.92 tonnes) non-hazardous waste recycled and reused at BKP & BTR
- 26% (1,103.54 tonnes) non-hazardous waste recycled and reused at SCM

Climate change

- 100% of the electricity used at BSI is purchased from PLN sourced from renewable energy
- Site Energy Management Team was developed at BSI, SCM, Pani, BKP & BTR, and MTI
- Energy and Climate Change Working Group was developed for Merdeka Group
- MGR entered into a Renewable Energy Certificates (REC) Sale and Purchase Agreement at Pani Gold Mine
- Scope 3 GHG training was conducted for relevant environmental officers from all sites and the head office

Biodiversity

- Biodiversity Management Policy was developed at Pani Gold Mine
- Pani Gold Mine's Biodiversity Management Plan was evaluated
- 25,405 tree seedlings were planted
- 143.56 ha of land reclamation

Air emissions

- Emissions Policy was developed at Pani Gold Mine
- Operations adhered to air emission quality standards in accordance with relevant regulations

2026 Target

Management system

100% of Merdeka's business units are ISO 14001:2015 certified

Water and wastewater*

- Reuse ± 8,500,000 m³ processed water solution for ore irrigation in heap leach pad at BSI
- Utilize ± 700,000 m³ of water collected in dams for top-up irrigation water in heap leach pad at BSI
- Utilize ± 59,000 m³ of rainwater collected in dams for domestic need at BSI
- 100% utilization (± 27,000 m³) of treated sewage water for dust suppression at CAR & SAR at BSI
- Reduce 3,422.66 m³ water withdrawal at SCM
- 7% hazardous waste and 5% non-hazardous waste reduction at Wetar
- 50% non-hazardous waste is recycled and reused at SCM

Hazardous and non-hazardous waste*

- Utilize 40% (±180 tonnes) of used oil (hazardous waste) for ANFO mine blasting by BSI
- Utilize 100% (60 to 70 tonnes) of food waste for livestock by local communities at BSI
- Reduce 5% non-hazardous waste at BKP & BTR
- Recycle and reuse 50% non-hazardous waste at SCM

Climate change

- Implement and monitor the energy management program
- Implement and monitor energy and climate change program
- All electricity consumed at BSI is covered by RECs from PLN's renewable energy sources
- 100% electricity consumed at Pani Gold Mine is covered by RECs from PLN's renewable energy sources.

Biodiversity

- Reclamation of 52.91 ha
- Implement and monitor Biodiversity Management Plan at Pani Gold Mine
- A permanent nursery station is established at Pani Gold Mine
- Fauna shelters are established at Pani Gold Mine
- Monitor biodiversity strategy

Air emissions

Operations adheres to air emission quality standards in accordance with relevant regulations

*The 2026 reduction targets for water, hazardous waste, and non-hazardous waste cover 40%, 20%, and 60% of operations under our operational control, respectively.



Penilaian dan Pengelolaan Risiko Lingkungan

Merdeka secara berkelanjutan melaksanakan penilaian risiko lingkungan dan pemantauan kinerja lingkungan di seluruh entitas anak. Tim Lingkungan Merdeka memberikan dukungan menyeluruh yang mencakup penyusunan Analisis Mengenai Dampak Lingkungan (AMDAL), Rencana Pengelolaan Lingkungan dan Rencana Pemantauan Lingkungan (RKL-RPL), pengelolaan serta pelaporan kepatuhan terhadap regulasi, hingga kegiatan rehabilitasi dan penutupan tambang.

Sepanjang tahun 2025, Tim Lingkungan Merdeka terus memperkuat kapabilitas dan peran strategis untuk mendukung berbagai kebutuhan proyek di seluruh wilayah operasi. Setiap lokasi operasional didukung oleh Manajer Lingkungan yang bertanggung jawab atas tata kelola lingkungan, pelaksanaan pelatihan dan peningkatan kesadaran, pemenuhan kepatuhan terhadap peraturan, serta kegiatan pemantauan lingkungan. Tim Lingkungan di kantor pusat berkolaborasi dengan para Manajer Lingkungan di seluruh entitas anak untuk memastikan pengelolaan yang optimal, termasuk pada lokasi-lokasi yang berada dalam tahap pemeliharaan dan perawatan.

Pada tahun 2025, Merdeka menyelenggarakan rapat tinjauan tahunan kepatuhan lingkungan yang dihadiri oleh Manager Lingkungan kantor pusat serta para Manajer Lingkungan dari seluruh entitas anak. Rapat ini membahas kinerja lingkungan, tren data, insiden lingkungan, dan target untuk mendukung proses identifikasi dan penetapan prioritas terhadap area-area yang memerlukan perhatian dan tindak lanjut lebih lanjut.

Pengelolaan risiko lingkungan dilakukan melalui berbagai mekanisme, termasuk namun tidak terbatas pada Register Risiko kantor pusat dan Register Risiko Operasional yang diterapkan di setiap lokasi tambang. Risiko-risiko tersebut dievaluasi dan dilaporkan secara berkala kepada Komite Keberlanjutan dan Direksi setiap triwulan untuk memastikan pengawasan dan tindak lanjut yang tepat.

Pemantauan, Audit, dan Inspeksi Lingkungan

Ketidakpatuhan terhadap peraturan lingkungan dapat mengakibatkan konsekuensi serius, seperti litigasi, pengawasan ketat oleh regulator, penundaan operasional, dan potensi pencabutan izin operasional. Di Merdeka, kami mengelola risiko ini dengan menerapkan berbagai pengendalian dan tindakan manajemen, antara lain melakukan tinjauan berkala terhadap data dalam sistem pengelolaan lingkungan, memastikan bahwa kondisi, tugas, dan status kepatuhan selalu diperbarui dan ditetapkan dengan akurat.

Audit internal dilakukan secara reguler oleh tim lingkungan terhadap kepatuhan peraturan pemerintah dan pemenuhan persyaratan ISO 14001:2015. Kami juga melaksanakan audit eksternal dengan melibatkan pemerintah untuk memastikan kepatuhan terhadap peraturan pemerintah serta lembaga sertifikasi untuk memverifikasi pemenuhan persyaratan ISO 14001:2015.

Environmental Risk Assessment and Management

Merdeka consistently conducts environmental risk assessments and monitors environmental performance across all subsidiaries. Merdeka's Environmental Team provides comprehensive support, including the preparation of Environmental Impact Assessments, Environmental Management Plans and Environmental Monitoring Plans, management and reporting on regulatory compliance, as well as rehabilitation and mine closure activities.

Throughout 2025, Merdeka's Environmental Team continues to strengthen its capabilities and strategic role to support various project needs across all operational regions. Each operational site of is supported by an Environmental Manager responsible for environmental governance, conducting training and raising awareness, ensuring regulatory compliance, and carrying out environmental monitoring activities. The corporate-level Environmental Team collaborates with Environmental Managers across all subsidiaries to ensure optimal management, including at sites in the maintenance and care phase.

In 2025, Merdeka held an annual environmental compliance review meeting attended by the Head Office Environmental Manager and Environmental Managers from all subsidiaries. This meeting discussed environmental performance, data trends, environmental incidents, and targets to support the process of identifying and prioritizing areas requiring further attention and follow-up.

Environmental risk management is carried out through various mechanisms, including but not limited to the Corporate Risk Register and the Operational Risk Register implemented at each mining site. These risks are evaluated and reported periodically to the Sustainability Committee and the Board of Directors on a quarterly basis to ensure proper oversight and follow-up.

Environmental Monitoring, Audits, and Inspections

Non-compliance with environmental regulations can result in serious consequences, such as litigation, strict oversight by regulators, operational delays, and the potential revocation of operating permits. At Merdeka, we manage these risks by implementing various controls and management actions, including conducting periodic reviews of data within the environmental management system to ensure that conditions, tasks, and compliance status are always updated and accurately recorded.

Internal audits are conducted regularly by the environmental team to ensure compliance with government regulations and fulfillment of ISO 14001:2015 requirements. We also conduct external audits involving government agencies to ensure compliance with government regulations, as well as certification bodies to verify fulfillment of ISO 14001:2015 requirements.

Pada tahun 2025, tim lingkungan dari kantor pusat Perusahaan melaksanakan audit dampak lingkungan internal tahunan melalui *Annual Environmental Periodic Review* (AEPR) di seluruh lokasi operasional, yang mencakup aspek utama seperti pengelolaan air, limbah B3 dan non-B3, serta emisi udara. Audit ini dilakukan sesuai dengan standar internal yang telah ditetapkan untuk mengevaluasi kinerja lingkungan, memastikan kepatuhan terhadap peraturan yang berlaku, serta mengidentifikasi peluang untuk peningkatan berkelanjutan.

Tim kantor pusat dan entitas anak akan melakukan audit lintas lokasi terhadap sistem pengelolaan lingkungan dan kepatuhan terhadap peraturan serta persyaratan di semua entitas anak. Audit ini direncanakan akan dilakukan setiap tahun untuk mendorong peningkatan kinerja lingkungan secara berkelanjutan.

Semua lokasi operasional juga melakukan inspeksi lingkungan secara rutin. Merdeka telah mengembangkan indikator kinerja utama (*Key Performance Indicators/KPI*) khusus untuk inspeksi ini, yang dilacak melalui laporan lingkungan bulanan, memberikan gambaran kinerja berdasarkan metrik untuk tim di setiap entitas anak. Laporan ini digunakan sebagai bahan diskusi dengan manajemen lokasi terkait kinerja lingkungan, serta untuk melacak perubahan persyaratan pelaporan hukum.

Kami semakin fokus pada peningkatan kesadaran dan akuntabilitas terkait insiden serta mendorong perbaikan budaya dalam pelaporan insiden. Pendekatan kami mencakup rapat kepatuhan lingkungan bulanan dengan Manager Lingkungan dan Manajer Lingkungan di setiap entitas anak.

Tata Kelola Air dan Efluen^{[3-3][303-1][14.7.1][14.7.2][F.14]}

Air merupakan sumber daya vital bagi keberlangsungan kehidupan di bumi. Tantangan utama yang dihadapi saat ini mencakup aspek ketersediaan, kualitas, serta pengelolaannya. Di berbagai wilayah, keterbatasan sumber daya air telah menimbulkan kondisi kekeringan dan berkurangnya pasokan untuk kebutuhan domestik maupun kegiatan industri.

Merdeka menyadari bahwa air merupakan sumber daya bersama yang terbatas dan memiliki peran penting bagi kesejahteraan masyarakat serta keberlanjutan operasi perusahaan. Pemanfaatan air di Merdeka mencakup kegiatan eksplorasi, pengendalian debu, kebutuhan domestik, pencucian kendaraan, serta proses pengolahan di area operasional.

Sebagai upaya mendukung peningkatan akses masyarakat terhadap air bersih, Merdeka menyalurkan bantuan penyediaan air bersih bagi masyarakat di sekitar area operasional Tambang Nikel Konawe dan Tambang Emas Pani.

In 2025, the Company's head office environmental team conducted annual internal environmental impact audits through Annual Environmental Periodic Review (AEPR) across all operational sites, covering key aspects such as water management, hazardous and non-hazardous waste, and air emissions. These audits were conducted in accordance with established internal standards to evaluate environmental performance, ensure compliance with applicable regulations, and identify opportunities for continuous improvement.

The corporate team and business entities will conduct cross-location audits of environmental management systems and compliance with regulations and requirements across all business entities. These audits are planned to be conducted annually to drive continuous improvement in environmental performance.

All operational sites also conduct routine environmental inspections. Merdeka has developed specific Key Performance Indicators (KPIs) for these inspections, which are tracked through monthly environmental reports, providing a performance overview based on metrics for teams at each subsidiary. These reports are used as discussion material with site management regarding environmental performance, as well as to track changes in legal reporting requirements.

We are increasingly focused on raising awareness and accountability regarding incidents and fostering a culture of improvement in incident reporting. Our approach includes monthly environmental compliance meetings with Environmental Managers and Environmental Managers at each subsidiary.

Water and Effluent Management

Water is a vital resource for sustaining life on Earth. The primary challenges currently faced include aspects of availability, quality, and management. In various regions, water scarcity has led to drought conditions and reduced supplies for both domestic needs and industrial activities.

Merdeka recognizes that water is a limited shared resource that plays a crucial role in community well-being and the sustainability of the company's operations. Water usage at Merdeka includes exploration activities, dust control, domestic needs, vehicle washing, and processing operations within the operational areas.

As part of efforts to support improved community access to clean water, Merdeka provides clean water assistance to communities near the Konawe Nickel Mine and Pani Gold Mine operational areas.

Merdeka berkomitmen untuk mengelola sumber daya air secara bertanggung jawab melalui penerapan praktik pengelolaan air yang efektif serta upaya berkelanjutan untuk mengurangi pembuangan air limbah. Selain itu, Merdeka mendorong penerapan perspektif daur hidup di seluruh rantai pasok guna menekan konsumsi air dan mengurangi timbulan air limbah.

Dalam pengelolaan air, Merdeka menjalin kerja sama dengan para pemangku kepentingan untuk mengidentifikasi pengguna air lainnya serta pihak-pihak yang berpotensi terdampak oleh kegiatan operasional perusahaan, dengan tujuan mewujudkan penggunaan air yang bertanggung jawab dan berkelanjutan. Merdeka juga menerapkan prinsip hierarki mitigasi yang mencakup langkah pencegahan dan pengurangan dampak penggunaan air serta timbulan air limbah terhadap pekerja, masyarakat sekitar, dan lingkungan. Apabila pencegahan tidak dapat dilakukan sepenuhnya, Merdeka akan berupaya meminimalkan dampak dan memberikan kompensasi yang sesuai. [303-1][14.7.1]

Pemantauan terhadap efektivitas target dan program pengelolaan air dilakukan oleh Kepala Teknik Tambang atau General Manager di masing-masing entitas anak Merdeka. Hasil pencapaian target dan pelaksanaan program tersebut dilaporkan kepada Komite Keberlanjutan dan menjadi dasar dalam penyusunan strategi serta pengawasan implementasi Kebijakan Pengelolaan Air. [3-3]

Kinerja Pengelolaan Air di Merdeka [303-1][303-4][14.7.2]

Dalam mendukung kebutuhan operasionalnya, Merdeka memanfaatkan berbagai sumber air, termasuk air hujan, air sungai, air tanah, serta air hasil daur ulang. Air permukaan digunakan untuk kegiatan penyiraman jalan tambang dan jalan *hauling*, sementara air tanah dimanfaatkan untuk memenuhi kebutuhan domestik di area operasional.

Sisa air yang digunakan untuk penyiraman jalan tambang dan jalan *hauling* terlebih dahulu diolah melalui kolam pengendapan sebelum dilepaskan kembali ke lingkungan. Sementara itu, air limbah dari kegiatan domestik diproses di Instalasi Pengolahan Air Limbah (IPAL) untuk memastikan kualitasnya memenuhi baku mutu yang telah ditetapkan. Setelah memenuhi standar tersebut, air hasil olahan dialirkan ke badan air penerima, seperti sungai, sebagai bagian dari komitmen Merdeka dalam menjaga kelestarian lingkungan. Seluruh entitas anak Merdeka mengelola air limbah domestik melalui IPAL yang menggunakan kombinasi teknologi aerobik, anaerobik, kimia, dan fisika untuk memastikan efektivitas proses pengolahan.

Merdeka mengelola air limbah dari kegiatan operasional pertambangan sesuai dengan ketentuan dalam persetujuan teknis yang berlaku di setiap lokasi operasi. Persyaratan tersebut mencakup pemenuhan peraturan teknis baku mutu air limbah yang ditetapkan. Setiap operasi memiliki titik penataan yang dipantau secara berkala sesuai dokumen AMDAL. Pengelolaan air dilakukan dengan prinsip konservasi

Merdeka is committed to managing water resources responsibly through the implementation of effective water management practices and sustained efforts to reduce wastewater discharge. Additionally, Merdeka promotes the application of a life cycle perspective throughout the supply chain to minimize water consumption and reduce wastewater generation.

In water management, Merdeka collaborates with stakeholders to identify other water users and parties potentially impacted by the company's operational activities, with the aim of achieving responsible and sustainable water use. Merdeka also applies the mitigation hierarchy principle, which includes measures to prevent and reduce the impacts of water use and wastewater generation on employees, surrounding communities, and the environment. If prevention cannot be fully achieved, Merdeka will strive to minimize the impacts and provide appropriate compensation.

Monitoring of the effectiveness of water management targets and programs is conducted by the Head of Technical Mining or General Manager at each of Merdeka's subsidiaries. The results of target achievement and program implementation are reported to the Sustainability Committee and serve as the basis for formulating strategies and overseeing the implementation of the Water Management Policy.

Water Management Performance at Merdeka

To support its operational needs, Merdeka utilizes various water sources, including rainwater, river water, groundwater, and recycled water. Surface water is used for flushing mine roads and haul roads, while groundwater is utilized to meet domestic needs in operational areas.

The water used for flushing mine roads and haul roads is first treated in settling ponds before being released back into the environment. Meanwhile, wastewater from domestic activities is processed at the Wastewater Treatment Plant (WWTP) to ensure its quality meets established standards. After meeting these standards, the treated water is discharged into receiving water bodies, such as rivers, as part of Merdeka's commitment to environmental sustainability. All of Merdeka's subsidiaries manage domestic wastewater through WWTPs that utilize a combination of aerobic, anaerobic, chemical, and physical technologies to ensure the effectiveness of the treatment process.

Merdeka manages wastewater from mining operations in accordance with the provisions of the applicable technical approvals at each operational site. These requirements include compliance with the technical regulations for wastewater quality standards. Each operation has compliance points that are monitored periodically in accordance with the Environmental Impact Assessment documents. Water management is conducted based on the principle of water

sumber daya air untuk memastikan kegiatan penambangan tidak berdampak negatif pada sumber air yang dimanfaatkan masyarakat sekitar. [303-2][14.7.3]

Pengelolaan Air pada Operasional Tambang

Merdeka menerapkan upaya pengurangan, penggunaan kembali, dan daur ulang air pada 60% operasi yang berada di bawah kendali operasional Perusahaan. Tambang Emas Tujuh Bukit menerapkan sistem air rangkaian tertutup dalam proses pengolahan, sehingga tidak memanfaatkan air dari sungai atau badan air. Pengelolaan air limbah tambang dilakukan dengan metode fisika dan kimia. [303-1][14.7.2][303-2][14.7.3]

Untuk kebutuhan domestik, Tambang Emas Tujuh Bukit memanfaatkan air hujan dan air tanah dari sumur bor yang telah dilengkapi dengan Surat Izin Pengambilan Air Tanah (SIPA). Selama tahun 2025 berdasarkan pencatatan *flowmeter*, pengambilan air oleh Tambang Emas Tujuh Bukit tercatat sebanyak 71,36 megaliter dari air hujan dan 1,26 megaliter dari air tanah. [303-3]

Untuk mengurangi pengambilan air dan meminimalkan *effluent*, Tambang Emas Tujuh Bukit mendaur ulang 1.067,18 megaliter air untuk *dust palliatives*, *water flush*, fasilitas kamp karyawan, fasilitas *Ore Preparation Plant* (OPP), dan fasilitas *Adsorption, Desorption and Recovery* (ADR). Sebanyak 8.573,03 megaliter air juga digunakan kembali dari *Pregnant Leach Solution* (PLS) ke *Adsorption, Desorption and Recovery* (ADR).

Sementara itu, Tambang Tembaga Wetar juga menerapkan sistem air rangkaian tertutup dalam proses pemurnian logamnya. Sebelum dilepas ke badan air, air diolah di fasilitas pengolahan air hingga memenuhi baku mutu yang ditetapkan oleh pemerintah. Sepanjang tahun 2025, Tambang Tembaga Wetar, Tambang Nikel Konawe, Pabrik AIM, dan Tambang Emas Pani mencatat pengambilan air masing-masing sebanyak 349,17, 342,27, 4.098,10, dan 116,86 megaliter.

Upaya Mitigasi Tekanan Air [2-25]

Berdasarkan penilaian risiko fisik perubahan iklim yang dilakukan oleh konsultan independen yang ditunjuk oleh perusahaan, terdapat salah satu entitas anak kami yaitu Tambang Emas Tujuh Bukit yang berada di wilayah dengan tekanan air tinggi (*water stress area*). Hal ini juga didukung oleh skenario iklim global dari IPCC dan data *Aqueduct Water Risk Atlas* dari *Water Resource Institute*.

Sebagai langkah mitigasi, Tambang Emas Tujuh Bukit telah membangun enam bendungan untuk menampung air hujan dan mengantisipasi risiko kelangkaan air selama musim kemarau.

Keenam bendungan tersebut dirancang dengan fungsi masing-masing yaitu:

1. Bendungan 6: Berfungsi menampung air baku untuk memenuhi kebutuhan air rumah tangga.
2. Bendungan 5: Berfungsi mengendapkan sedimen yang terkandung dalam air hujan.

resource conservation to ensure that mining activities do not negatively impact water sources utilized by the surrounding community.

Water Management in Mining Operations

Merdeka implements water reduction, reuse, and recycling measures across 60% of operations under the Company's operational control. The Tujuh Bukit Gold Mine employs a closed-loop water system in its processing operations, thus not utilizing water from rivers or water bodies. Mine wastewater management is carried out using physical and chemical methods.

For domestic needs, the Tujuh Bukit Gold Mine utilizes rainwater and groundwater from boreholes that have been equipped with a Groundwater Extraction Permit (SIPA). During 2025, based on flowmeter records, water withdrawal by the Tujuh Bukit Gold Mine totaled 71.36 megaliters from rainwater and 1.26 megaliters from groundwater.

To reduce water withdrawal and minimize effluent, the Tujuh Bukit Gold Mine recycled 1,067.18 megaliters of water for dust suppression, water flushing, employee camp facilities, the Ore Preparation Plant (OPP), and the Adsorption, Desorption, and Recovery (ADR) facility. A total of 8,573.03 megaliters of water is also reused from the Pregnant Leach Solution (PLS) to the Adsorption, Desorption, and Recovery (ADR) system.

Meanwhile, the Wetar Copper Mine also employs a closed-loop water system in its metal refining process. Before being discharged into water bodies, the water is treated at the water treatment facility until it meets the quality standards set by the government. Throughout 2025, the Wetar Copper Mine, Konawe Nickel Mine, AIM Plant, and Pani Gold Mine recorded water withdrawals of 349.17, 342.27, 4,098.10, and 116.86 megaliters, respectively.

Water Stress Mitigation Efforts

Based on a physical climate change risk assessment conducted by an independent consultant appointed by the company, one of our business entities, the Tujuh Bukit Gold Mine, is located in a water-stressed area. This finding is supported by global climate scenarios from the IPCC and data from the Aqueduct Water Risk Atlas by the Water Resources Institute.

As a mitigation measure, the Tujuh Bukit Gold Mine has constructed six dams to store rainwater and anticipate the risk of water scarcity during the dry season.

These six dams were designed with the following specific functions:

1. Dam 6: Functions to store raw water to meet household water needs.
2. Dam 5: Serves to settle sediment contained in rainwater.

- Bendungan 4 (*Storm Water Pond - SWP*): Berfungsi untuk menampung air hujan yang mengalir dari area *heap leach*.
- Bendungan 3, Bendungan 2, dan Bendungan 1: Berfungsi sebagai bendungan pengendalian lingkungan untuk memastikan kualitas air tetap sesuai standar pemerintah yang berlaku sebelum dilepaskan ke badan air.

Untuk mencegah luapan air yang berpotensi melebihi kapasitas dam saat musim hujan, air dari bendungan pengendali lingkungan yang telah memenuhi baku mutu akan dialirkan ke Sungai Katak melalui titik penataan 1 (CP-1), sedangkan air di kolam-kolam pengendapan yang telah memenuhi baku mutu akan dialirkan ke Sungai Pasir Pendek melalui titik penataan 2 (CP-2), dan ke Sungai Dadapan melalui titik penataan 3 (CP-3). Sistem ini dirancang untuk memastikan bahwa air yang dilepaskan telah memenuhi baku mutu, sekaligus mencegah potensi luapan air sehingga menjaga kapasitas dam agar tetap efektif dalam mengendapkan sedimen.

Pada CP-1, titik pelepasan utama di Tambang Emas Tujuh Bukit, telah dipasang alat pemantauan kualitas air *real-time* yang terhubung dengan Sistem Pemantauan Kualitas Air Limbah Secara Terus-Menerus dan Dalam Jaringan (SPARING) dari Kementerian Lingkungan Hidup. Alat yang mulai dioperasikan pada awal 2023 ini digunakan untuk memantau dan melaporkan volume serta kualitas air yang dilepaskan.

Di Tambang Nikel Konawe, pengelolaan kualitas air limbah tambang dan air limbah domestik dilakukan secara aktif dan rutin. Sepanjang tahun 2025, Tambang Tembaga Wetar berhasil melepaskan air sejumlah 48,83 megaliter menuju Kali Kuning, Kali Koreng, Kali Lurang, dan Kali Wetuk. Sepanjang tahun 2025, tidak terdapat keluhan masyarakat yang disebabkan oleh insiden tumpahan efluen signifikan yang berdampak pada lingkungan. [F.15]

- Dam 4 (*Storm Water Pond - SWP*): Functions to store rainwater flowing from the heap leach area.
- Dam 3, Dam 2, and Dam 1: Serve as environmental control dams to ensure water quality remains in compliance with applicable government standards before being released into water bodies.

To prevent water overflow that could potentially exceed the dam's capacity during the rainy season, water from the environmental control dam that meets quality standards will be discharged into the Katak River via discharge point 1 (CP-1), while water in the settling ponds that meets quality standards will be discharged into the Pasir Pendek River via discharge point 2 (CP-2), and into the Dadapan River via discharge point 3 (CP-3). This system is designed to ensure that the discharged water meets quality standards, while preventing potential water overflow to maintain the dam's capacity for effective sediment retention.

At CP-1, the main discharge point at the Tujuh Bukit Gold Mine, real-time water quality monitoring equipment has been installed and connected to the Ministry of Environment's Continuous Online Wastewater Quality Monitoring System (SPARING). This equipment, which began operation in early 2023, is used to monitor and report the volume and quality of discharged water.

At the Konawe Nickel Mine, the management of mine wastewater and domestic wastewater is conducted actively and routinely. Throughout 2025, the Wetar Copper Mine successfully discharged 48.83 megaliters of water into the Kuning River, Koreng River, Lurang River, and Wetuk River. Throughout 2025, there were no community complaints resulting from significant effluent spills that impacted the environment.

Tabel Jumlah Pengambilan Air pada Entitas Anak (dalam Megaliter) [303-3][14.7.4][F.8]
Table of Water Withdrawal Volumes by Subsidiary (in Megaliters)

Sumber Pengambilan air (dalam Megaliter) Water Withdrawal Sources (in Megaliters)	2023	2024	2025
Tambang Emas Tujuh Bukit Tujuh Bukit Gold Mine			
Air Hujan Rainwater	2,153.94	1,156.59	71.36
Air Tanah Groundwater	17.61	5.45	1.26
Tambang Tembaga Wetar Wetar Copper Mine			
Air Sungai River Water	610.76	325.95	349.17
Tambang Emas Pani Pani Gold Mine			
Air Permukaan Surface Water	27.51	1.3	0
Air Tanah Groundwater	13.06	13.69	31.27

Sumber Pengambilan air (dalam Megaliter) Water Withdrawal Sources (in Megaliters)	2023	2024	2025
Air dari Pihak Ketiga Water from Third Parties	13.56	38.76	85.60
Tambang Nikel Konawe Konawe Nickel Mine			
Air Permukaan Surface Water	122.17	230.47	342.27
Pabrik AIM AIM Factory			
Air Tanah Groundwater	142.14	135.55	129.58
Pihak Ketiga (Pembelian dari IMIP) Third Parties (Purchases from IMIP)	182.28	1,414.95	3,968.53
Bukit Smelter Indonesia (BSID) Bukit Smelter Indonesia (BSID)			
Pihak ketiga (Pembelian dari IMIP) Third party (Purchase from IMIP)	872.53	967.74	868.11
Cahaya Smelter Indonesia (CSID) Cahaya Smelter Indonesia (CSID)			
Pihak ketiga (Pembelian dari IMIP) Third parties (Purchases from IMIP)	901.48	1,164.50	1,117.59
Zhao Hui Nickel (ZHN)			
Pihak ketiga (Pembelian dari IMIP) Third parties (Purchases from IMIP)	1,372.76	3,014.45	2,865.07
Huaneng Metal Industry (HNMI)			
Pihak ketiga (Pembelian dari IMIP) Third party (Purchase from IMIP)	414.11	761.61	317.47
Total Pengambilan Air Total Water Withdrawal	6,843.91	9,231.01	10,147.26

Tabel Jumlah Konsumsi Air pada Entitas Anak (dalam Megaliter) [303-3] [303-4] [303-5] [F.8] [F.13]
Table of Water Withdrawal Volumes by Subsidiary (in Megaliters)

Keterangan Notes	BSI	Wetar	Pani	SCM	MTI	BSID	CSID	ZHN	HNMI	Total
Total Pengambilan Air Total Water Withdrawal	73	349	117	342	4,098	868	1,118	2,865	317	10,147
Total Pembuangan/Pelepasan Air Total Water Discharge	0	49	0	0	25	0	0	0	0	74
Total Konsumsi Air Total Water Consumption	73	300	117	342	4,073	868	1,118	2,865	317	10,073

Total konsumsi air Merdeka pada tahun 2025 adalah sebesar 10.073 megaliter, sedangkan total intensitas konsumsi air adalah sebesar 5,32 megaliter/juta USD.

Merdeka's total water consumption in 2025 is 10,073 megaliters, while the total water consumption intensity is 5.32 megaliters/million USD.

Perayaan Hari Lingkungan Hidup di Merdeka

World Environment Day Celebration at Merdeka

Peringatan Hari Lingkungan Hidup (HLH) Sedunia 2025 menjadi momentum bagi Grup Merdeka untuk memperkuat peran dalam pengelolaan lingkungan. Dengan mengusung tema "Ending Plastic Pollution", rangkaian kegiatan difokuskan pada peningkatan kesadaran, perubahan perilaku, serta penguatan praktik pengelolaan lingkungan yang lebih bertanggung jawab di seluruh lini operasi.

Di Wetar, PT Batutua Kharisma Permai dan PT Batutua Tembaga Raya (BKP-BTR) memulai serangkaian kegiatan perayaan melalui edukasi pengolahan sampah rumah tangga di SMP Satap Lurang pada 19 Mei 2025. Kemudian acara dilanjutkan dengan kegiatan bersih-bersih area camp dan pantai Lerokis pada 5 Juni 2025 yang diikuti 72 peserta, menghasilkan 218 kg sampah. Di hari yang sama, kegiatan bersih pantai juga dilakukan di sekitar sekolah bersama siswa SD hingga SMA Lurang. Program Internal perusahaan pun diperkuat dengan webinar bertema "Strategi Reklamasi dan Implementasinya di Wetar".

Di Tambang Emas Pani, peringatan dimulai dengan kegiatan penanaman bibit pohon di Desa Hulawa bersama mahasiswa Universitas Negeri Gorontalo dan pemerintah desa. Program "Enviro Goes to School" dilakukan di 3 sekolah dasar di Kecamatan Buntulia dengan edukasi interaktif bertema menjaga kebersihan dan menggambar lingkungan pada 4 dan 10 Juni 2025. Tak ketinggalan, rangkaian kegiatan PGP ditutup dengan aksi bersih pantai di kawasan Pohon Cinta Marisa bersama Dinas Lingkungan Hidup Kabupaten Pohuwato pada 5 Juni 2025 dan seminar lingkungan bertema "Keanekaragaman Hayati Celebes & Bahaya Biologi di Tempat Kerja Pertambangan" pada 8 Juni 2025.

The commemoration of World Environment Day (WED) 2025 serves as a momentum for the Merdeka Group to strengthen its role in environmental management. Under the theme "Ending Plastic Pollution," the series of activities focuses on raising awareness, changing behavior, and strengthening more responsible environmental management practices across all operational lines.

In Wetar, PT Batutua Kharisma Permai and PT Batutua Tembaga Raya (BKP-BTR) kicked off a series of celebratory activities with a household waste management education session at SMP Satap Lurang on May 19, 2025. The event continued with a cleanup of the camp area and Lerokis Beach on June 5, 2025, attended by 72 participants, resulting in the collection of 218 kg of waste. On the same day, a beach cleanup was also conducted around the school with students from elementary through high school in Lurang. The company's internal program was further strengthened with a webinar titled "Reclamation Strategies and Implementation in Wetar."

At the Pani Gold Mine, the event kicked off with a tree-planting activity in Hulawa Village, involving students from Gorontalo State University and village officials. The "Enviro Goes to School" program was held at three elementary schools in Buntulia Subdistrict, featuring interactive educational sessions on maintaining cleanliness and drawing environmental scenes on June 4 and 10, 2025. Not to be missed, the PGP series of activities concluded with a beach cleanup at the Pohon Cinta Marisa area in collaboration with the Pohuwato Regency Environmental Agency on June 5, 2025, and an environmental seminar themed "Biodiversity of Celebes & Biological Hazards in Mining Workplaces" on June 8, 2025.



PT Merdeka Tsingshan Indonesia (MTI) menyelenggarakan perayaan HLH 2025 dengan melibatkan seluruh elemen perusahaan melalui serangkaian lomba bertema lingkungan seperti *Eco-Lens* (fotografi), *Trash Art* (daur ulang), *Eco Green Battle* (cerdas cermat), dan *Vi-Video Contest* (kampanye video). Tak hanya itu, MTI juga menggelar program MTI Goes to School di SDN Labota untuk mengedukasi siswa tentang pemilahan sampah plastik. Puncaknya, pada 5 Juni 2025, MTI menyelenggarakan upacara HLH di area *Acid Plant*.



PT Merdeka Tsingshan Indonesia (MTI) organized the 2025 HLH celebration by involving all company units through a series of environment-themed contests such as *Eco-Lens* (photography), *Trash Art* (recycling), *Eco Green Battle* (quiz), and the *Vi-Video Contest* (video campaign). Not only that, MTI also held the "MTI Goes to School" program at SDN Labota to educate students on plastic waste sorting. As the highlight, on June 5, 2025, MTI held an HLH ceremony at the *Acid Plant* site.



PT Sulawesi Cahaya Mineral (SCM) melaksanakan rangkaian kegiatan peringatan Hari Lingkungan Hidup Sedunia 2025 dengan tema "Beat Plastic Pollution" yang berlangsung sejak 29 Mei hingga 10 Juli 2025. SCM menyelenggarakan berbagai kompetisi seperti lomba cerdas cermat lingkungan, lomba pengelolaan lingkungan area kerja, hingga lomba kreativitas barang bekas berbasis prinsip 3R (*Reduce, Reuse, Recycle*) yang berhasil menghasilkan karya-karya inovatif dari limbah plastik. Kegiatan edukatif juga diperkuat melalui seminar lingkungan "Loka Karya" yang menghadirkan Samanea Saman Turusi dari Unit Pelaksana Teknis Daerah (UPTD) Persampahan Provinsi Sulawesi Tenggara.

PT Sulawesi Cahaya Mineral (SCM) carried out a series of activities to commemorate World Environment Day 2025 under the theme "Beat Plastic Pollution," which ran from May 29 to July 10, 2025. SCM organized various competitions, such as an environmental quiz contest, a workplace environmental management contest, and a creativity contest for repurposing used items based on the 3R (*Reduce, Reuse, Recycle*) principles, which successfully produced innovative creations from plastic waste. Educational activities were further reinforced through the "Loka Karya" environmental seminar, which featured Samanea Saman Turusi from the Regional Technical Implementation Unit for Waste Management in Southeast Sulawesi Province.



PT Bumi Suksesindo (BSI) menggelar transplantsi terumbu karang dan bersih pantai di Grand Watu Dodol (GWD), Bangsring, Banyuwangi pada 29 Juli 2025. Kegiatan ini diikuti oleh lebih dari 100 karyawan BSI, kontraktor, serta pemangku kepentingan eksternal, yaitu Kelompok Masyarakat Sadar Wisata Pesona Bahari Bangsring, Dinas Perikanan, dan Dinas Lingkungan Hidup. Sebanyak 25 rak terumbu karang ditempatkan di dasar perairan laut GWD, dengan masing-masing rak menampung sekitar 100 bibit karang.

PT Bumi Suksesindo (BSI) conducted a coral reef transplantation and beach cleanup at Grand Watu Dodol (GWD), Bangsring, Banyuwangi on July 29, 2025. The activity was attended by more than 100 BSI employees, contractors, and external stakeholders, including the Sadar Wisata Pesona Bahari Bangsring community group, the Fisheries Office, and the Environmental Agency. A total of 25 coral reef racks were placed on the seabed in GWD waters, with each rack accommodating approximately 100 coral seedlings.



Di kantor pusat Jakarta, peringatan HLH dimulai dengan *Eco Challenge*: "Botol Kembali, Bumi Lestari" yang mengajak karyawan untuk mengumpulkan botol plastik melalui *vending machine Plasticpay*. Pada 19 Juni 2025, sesi webinar *Eco Talk* menghadirkan Akademi Kompos sebagai narasumber dalam diskusi bertajuk "Dari Kesadaran ke Aksi: Menjadi Generasi Peduli Sampah dan Inovator Pengelolannya" dilanjutkan dengan *Eco Workshop*. Sebagai penutup rangkaian kegiatan memperingati Hari Lingkungan Hidup Sedunia 2025, *Corporate Volunteer Program – Bakti Merdeka* mengajak 21 karyawan untuk turun langsung dalam aksi peduli lingkungan dengan melakukan *Waste Clean-Up* bersama komunitas Sebumi pada 24 Juni 2025. Berlokasi di sekitar Situ Rawa Kalong, Depok.

At the Jakarta head office, World Environment Day celebrations began with the *Eco Challenge*: "Bottles Return, Earth Endures," encouraging employees to collect plastic bottles via the *Plasticpay* vending machine. On June 19, 2025, the *Eco Talk* webinar session featured the *Compost Academy* as a speaker in a discussion titled "From Awareness to Action: Becoming a Waste-Conscious Generation and Innovators in Its Management," followed by an *Eco Workshop*. To conclude the series of activities commemorating World Environment Day 2025, the *Corporate Volunteer Program – Bakti Merdeka* invited 21 employees to get directly involved in environmental action by conducting a *Waste Clean-Up* with the *Sebumi* community on June 24, 2025. The event took place around Situ Rawa Kalong, Depok.



Pameran & Talk Show Hari Lingkungan Hidup 2025 Booth and Talkshow at World Environmental Day 2025



Grup Merdeka berpartisipasi dalam peringatan Hari Lingkungan Hidup yang diselenggarakan oleh Kementerian Lingkungan Hidup dengan menghadirkan stan pameran berisi video, poster, dan infografis pencapaian ESG di seluruh operasional. Kunjungan Menteri Lingkungan Hidup di stan Merdeka mencerminkan apresiasi pemerintah atas komitmen Merdeka terhadap praktik pertambangan yang bertanggung jawab dan berkelanjutan.

Merdeka Group participated in the commemoration of World Environment Day organized by the Ministry of Environment by presenting an exhibition booth featuring videos, posters, and infographics showcasing ESG achievements across its operations. The visit of the Minister of Environment to Merdeka's booth reflected the government's appreciation for Merdeka's commitment to responsible and sustainable mining practices.

Selain itu, Merdeka berpartisipasi dalam talkshow bertajuk "Membangun Ekosistem Kompetitif yang Selaras dengan Pertumbuhan Ekonomi dan Pelestarian Lingkungan." ESG & Climate Change Manager Merdeka, yang mewakili perusahaan, menjelaskan bahwa Merdeka mendukung ketahanan energi melalui produksi tembaga, emas, dan nikel sebagai bahan baku penting bagi pengembangan PLTB, PLTS, PLTA, serta baterai kendaraan listrik. Dengan demikian, Merdeka berkontribusi pada transisi energi bersih sekaligus menerapkan praktik penggunaan energi yang bertanggung jawab dan berkelanjutan di seluruh operasionalnya.

In addition, Merdeka participated in a talk show titled "Building a Competitive Ecosystem Aligned with Economic Growth and Environmental Preservation." Merdeka's ESG & Climate Change Manager, representing the company, explained that Merdeka supports energy resilience through the production of copper, gold, and nickel as key raw materials for the development of wind, solar, and hydropower plants, as well as electric vehicle batteries. Accordingly, Merdeka contributes to the clean energy transition while implementing responsible and sustainable energy practices across its operations.



Pengelolaan Limbah^{[3-3][306-1][306-2][14.5.1][14.5.2]}

[14.5.3][F.14]

Sebagai perusahaan pertambangan dan pengolahan mineral, termasuk emas, tembaga, dan nikel, Merdeka berkomitmen mengelola limbah secara bertanggung jawab dengan prinsip keberlanjutan dan pendekatan sirkular, melalui langkah-langkah sistematis untuk mengendalikan dampak aktual maupun potensial.

Dalam operasionalnya, berbagai faktor berkontribusi terhadap dampak limbah, antara lain penggunaan bahan kimia dan reagen dalam pengolahan mineral, pemanfaatan air untuk proses pengolahan, serta konsumsi bahan bakar untuk alat berat dan transportasi. Faktor-faktor ini terkait dengan kegiatan penambangan bijih mineral, pengolahan bijih menjadi produk akhir, dan pengelolaan material sisa dari proses tersebut.

Tambang Emas Tujuh Bukit, Tambang Nikel Konawe, Tambang Emas Pani, dan Tambang Tembaga Wetar menghasilkan limbah batuan yang dikelola sesuai dengan Rencana Pengelolaan Batuan Penutup. Tambang Emas Tujuh Bukit tidak menghasilkan tailing karena menggunakan metode pengolahan heap leach, sementara Tambang Emas Pani hingga saat ini belum memasuki tahap produksi. ^[14.5.5]

Pendekatan sirkular terus diimplementasikan di seluruh aktivitas perusahaan, mencakup bagian hulu dan hilir. Pada bagian hulu, Merdeka mendorong pemasok untuk memastikan penggunaan bahan baku yang lebih ramah lingkungan. Di bagian hilir, perusahaan bekerja sama dengan mitra kerja untuk meminimalkan limbah yang dihasilkan.

Limbah dengan dampak signifikan, seperti material sisa pengolahan, limbah cair dari proses produksi, serta limbah bahan berbahaya dan beracun (B3), dikelola secara bertanggung jawab melalui penerapan teknologi ramah lingkungan dan program pengurangan limbah di setiap tahap produksi.

Merdeka juga proaktif mengelola risiko pencemaran tanah, air, dan lingkungan sekitar yang berpotensi timbul dari pengelolaan limbah operasional. Pendekatan ini mencakup mitigasi dampak lingkungan pada bagian hulu, seperti dari pemasok bahan kimia dan bahan bakar, serta pada bagian hilir terkait pengelolaan limbah produk oleh pelanggan, kontraktor, atau pihak ketiga yang terlibat dalam rantai nilai perusahaan.

Merdeka berkomitmen untuk mematuhi regulasi yang berlaku di Indonesia dan menerapkan praktik terbaik dalam pengelolaan limbah sebagaimana diatur dalam Kebijakan Pengelolaan Limbah Merdeka. Perusahaan secara konsisten mendokumentasikan dan mengimplementasikan pengangkutan, penanganan, penyimpanan, dan pembuangan limbah sesuai dengan prosedur yang ditetapkan.

Waste Management

As a mining and mineral processing company, including gold, copper, and nickel, Merdeka is committed to managing waste responsibly based on principles of sustainability and a circular approach, through systematic measures to control both actual and potential impacts.

In its operations, various factors contribute to waste impacts, including the use of chemicals and reagents in mineral processing, water usage for processing, and fuel consumption for heavy equipment and transportation. These factors are associated with mineral ore mining activities, the processing of ore into final products, and the management of residual materials from these processes.

Tujuh Bukit Gold Mine, Konawe Nickel Mine, Pani Gold Mine, and Wetar Copper Mine generate waste rock that is managed in accordance with the Overburden Management Plan. Tujuh Bukit Gold Mine does not generate tailings as it utilizes the heap leach processing method, while Pani Gold Mine has not yet entered the production stage.

A circular approach is continuously implemented across all company activities, covering both upstream and downstream operations. In the upstream segment, Merdeka encourages suppliers to ensure the use of more environmentally friendly raw materials. In the downstream segment, the company collaborates with partners to minimize the waste generated.

Waste with significant impacts, such as processing residues, liquid waste from production processes, and hazardous and toxic waste, is managed responsibly through the application of environmentally friendly technologies and waste reduction programs at every stage of production.

Merdeka also proactively manages the risk of soil, water, and environmental contamination that may arise from the management of operational waste. This approach includes mitigating environmental impacts in the upstream segment, such as those from chemical and fuel suppliers, as well as in the downstream segment regarding product waste management by customers, contractors, or third parties involved in the company's value chain.

Merdeka is committed to complying with applicable regulations in Indonesia and implementing best practices in waste management as outlined in Merdeka's Waste Management Policy. The company consistently documents and implements the transportation, handling, storage, and disposal of waste in accordance with established procedures.

Merdeka mengadopsi hierarki mitigasi limbah yang mencakup pencegahan dan minimalisasi dampak dari limbah B3, limbah non-B3, serta limbah domestik terhadap pekerja, masyarakat sekitar, dan lingkungan. Jika langkah pencegahan tidak memungkinkan, Merdeka berkomitmen untuk meminimalkan dampak tersebut dan memberikan kompensasi yang sesuai.

Pengelolaan limbah B3 dilakukan dengan melibatkan pihak ketiga yang memiliki izin resmi dari otoritas terkait untuk melaksanakan pengumpulan, pengangkutan, pengolahan, pemanfaatan, dan/atau pembuangan limbah B3. Selain itu, Merdeka mendorong penerapan perspektif siklus hidup di seluruh rantai pasokan untuk mengurangi volume limbah yang dihasilkan.

Komite Keberlanjutan Merdeka bertanggung jawab mengawasi implementasi Kebijakan Pengelolaan Limbah. Komite ini secara berkala melaporkan pelaksanaan kebijakan kepada Direksi. Sementara itu, Kepala Teknik Tambang (KTT) atau General Manager masing-masing entitas anak bertanggung jawab untuk mengomunikasikan dan memantau penerapan Kebijakan Pengelolaan Limbah di unit kerja mereka.

Limbah B3

Dalam rangka mematuhi Peraturan Menteri Lingkungan Hidup dan Kehutanan No. 6 Tahun 2021 tentang Pengelolaan Limbah Bahan Berbahaya dan Beracun, perusahaan telah menyusun Prosedur Pengelolaan limbah B3 yang komprehensif. Prosedur ini mencakup kegiatan pemilahan, pengemasan, pelabelan dengan simbol khusus, penyimpanan, pengiriman internal, pemeriksaan, pencatatan, pengembalian limbah B3 ke pihak penghasil, inspeksi, pembersihan, pemeliharaan satelit LB3, serta pengelolaan tempat penyimpanan sementara limbah B3.

Prosedur ini juga mencakup pengiriman limbah B3 ke pihak ketiga berizin, pelaporan kepada pemerintah, serta penanganan darurat dan tumpahan, untuk memastikan pengelolaan limbah B3 dilakukan secara aman, bertanggung jawab, dan sesuai regulasi guna meminimalkan dampak lingkungan dan kesehatan.

Sepanjang tahun 2025, pengelolaan limbah B3 dilakukan melalui mekanisme internal dan kerja sama dengan pihak ketiga yang memiliki izin resmi dari Kementerian Lingkungan Hidup. Pihak ketiga yang dipilih memiliki fasilitas pengangkutan dan penyimpanan yang aman untuk memastikan penanganan limbah yang sesuai standar keselamatan.

Untuk memastikan kepatuhan dan kualitas pengelolaan, perusahaan menerapkan proses seleksi ketat, evaluasi kepatuhan terhadap kewajiban kontraktual dan peraturan, audit berkala, serta pemantauan langsung. Langkah-langkah ini memastikan bahwa pengelolaan limbah oleh mitra dilakukan secara aman dan sesuai dengan regulasi yang berlaku.

Merdeka adopts a waste mitigation hierarchy that includes the prevention and minimization of the impact of hazardous and toxic waste, non-hazardous and toxic waste, and domestic waste on workers, the surrounding community, and the environment. If preventive measures are not feasible, Merdeka is committed to minimizing such impacts and providing appropriate compensation.

Hazardous waste management is conducted by engaging third parties holding official permits from relevant authorities to carry out the collection, transportation, treatment, recovery, and/or disposal of hazardous waste. Additionally, Merdeka promotes the application of a life-cycle perspective throughout the supply chain to reduce the volume of waste generated.

Merdeka's Sustainability Committee is responsible for overseeing the implementation of the Waste Management Policy. This committee periodically reports on policy implementation to the Board of Directors. Meanwhile, the Head of Technical Mining (KTT) or General Manager of each subsidiary is responsible for communicating and monitoring the implementation of the Waste Management Policy within their respective units.

Hazardous Waste

To comply with Ministry of Environment and Forestry Regulation No. 6 of 2021 on the Management of Hazardous and Toxic Waste, the company has developed a comprehensive Hazardous and Toxic Waste Management Procedure. These procedures cover sorting, packaging, labeling with special symbols, storage, internal transport, inspection, record-keeping, return of Hazardous and Toxic Waste to the generator, inspections, cleanup, maintenance of hazardous and toxic waste facilities, and management of the temporary storage site for hazardous and toxic waste.

These procedures also cover the shipment of hazardous waste to licensed third parties, reporting to the government, as well as emergency response and spill management, to ensure that hazardous waste management is conducted safely, responsibly, and in compliance with regulations to minimize environmental and health impacts.

Throughout 2025, hazardous waste management is conducted through internal mechanisms and in collaboration with third parties holding official permits from the Ministry of Environment. Selected third parties possess safe transportation and storage facilities to ensure waste handling meets safety standards.

To ensure compliance and management quality, the company implements a strict selection process, evaluates compliance with contractual obligations and regulations, conducts periodic audits, and performs direct monitoring. These measures ensure that waste management by partners is conducted safely and in accordance with applicable regulations.

Selain itu, pengumpulan dan pemantauan data terkait limbah, termasuk limbah B3, dilakukan melalui sistem pencatatan terintegrasi. Sistem ini memungkinkan pelacakan yang transparan dan terukur terhadap jenis, *volume*, dan lokasi limbah, sehingga mendukung pengambilan keputusan yang lebih efektif. [306-2]

Perusahaan terus meningkatkan kinerja pengelolaan limbah melalui inovasi, implementasi teknologi *modern*, dan kolaborasi dengan berbagai pihak. Langkah-langkah ini sejalan dengan tujuan keberlanjutan perusahaan dalam meminimalkan dampak lingkungan dan mendukung pengelolaan limbah yang bertanggung jawab. [306-2]

Merdeka telah menetapkan mekanisme pengaduan, prosedur, dan infrastruktur yang dirancang untuk menangani potensi kebocoran limbah B3. Perusahaan juga memiliki Tim Tanggap Darurat (*Emergency Response Team/ERT*) yang bertugas melakukan mitigasi dan penanganan apabila terjadi insiden tumpahan limbah B3. [14.15.1]

Pada tahun 2025, BSI menggunakan kembali 36 ton limbah B3 (oli bekas), yang setara dengan 4% dari total oli bekas yang dihasilkan, untuk peledakan tambang menggunakan ANFO.

Sepanjang tahun 2025, tidak terdapat insiden tumpahan LB3 berskala besar di wilayah operasional Merdeka yang menyebabkan gangguan terhadap lingkungan maupun masyarakat sekitar. Hal ini mencerminkan efektivitas sistem pengelolaan dan kesiapsiagaan perusahaan dalam menghadapi potensi risiko terkait limbah B3. [14.15.2][F.15]

Additionally, the collection and monitoring of waste-related data, including hazardous waste, are conducted through an integrated recording system. This system enables transparent and measurable tracking of waste types, volumes, and locations, thereby supporting more effective decision-making.

The company continues to improve waste management performance through innovation, the implementation of modern technology, and collaboration with various parties. These steps align with the company's sustainability goals to minimize environmental impact and support responsible waste management.

Merdeka has established complaint mechanisms, procedures, and infrastructure designed to address potential hazardous waste leaks. The company also has an Emergency Response Team (ERT) tasked with mitigation and response in the event of a hazardous waste spill incident.

In 2025, BSI reused 36 tonnes of hazardous waste (used oil), equivalent to 4% of the total used oil generated, for mine blasting using ANFO.

Throughout 2025, there were no large-scale hazardous waste spills in Merdeka's operational areas that caused disruption to the environment or the surrounding community. This reflects the effectiveness of the company's management system and preparedness in addressing potential risks related to hazardous waste.

Limbah Non-B3

Sebagai bagian dari kepatuhan terhadap Undang-Undang Republik Indonesia No. 18 Tahun 2008, Merdeka telah menyusun Prosedur Pengelolaan Sampah. Prosedur ini mencakup pengumpulan, pengiriman, dan pengangkutan sampah domestik, termasuk pengelolaan di Tempat Penyimpanan Sementara (TPS) serta pemanfaatan sampah oleh pihak ketiga.

Dalam pengelolaan sampah anorganik yang tidak dapat terurai, Merdeka menerapkan prinsip *Reduce, Reuse, Recycle* (3R) untuk meminimalkan timbulan limbah non-B3 dan sampah. Di Tambang Tembaga Wetar, ban bekas dimanfaatkan untuk penguatan lereng dan tanggul *sediment pond*. Sementara itu, sampah organik diproses melalui pengomposan dan dimanfaatkan untuk keperluan daur ulang maupun daur pakai.

Merdeka menjalin kerja sama dengan masyarakat lokal untuk mendukung program daur ulang sampah organik dan anorganik yang memiliki nilai ekonomis. Di Tambang Emas Tujuh Bukit, limbah sisa makanan dimanfaatkan oleh Kelompok Masyarakat Binaan (PEGA) sebagai pakan ternak dan untuk budidaya maggot sedangkan kemasan makanan dimanfaatkan untuk dijadikan bijih plastik. Di Tambang Nikel Konawe, ban bekas dimanfaatkan untuk taman dan pot bunga. Sementara itu, di Pabrik AIM, minyak goreng bekas dimanfaatkan pihak ketiga sebagai bahan pembuatan biodiesel.

Pendekatan ini mencerminkan komitmen Merdeka dalam mengelola sampah secara bertanggung jawab sekaligus memberikan kontribusi positif terhadap perekonomian lokal, sejalan dengan prinsip keberlanjutan dan kepatuhan terhadap regulasi yang berlaku.

Salah satu kontraktor utama kami telah menerapkan program pemanfaatan limbah yang mencakup penggunaan kembali liner bekas sebagai lapisan dasar untuk area pencucian *camp shell*, pemanfaatan kayu kemasan untuk pembuatan palet, serta penggunaan limbah baja ringan menjadi penanda kabel (*cable sign*).

Selain itu, kontraktor tersebut melakukan inovasi dengan mengolah kembali limbah debu batu yang dihasilkan menjadi bata dan *paving block* bernilai ekonomis yang dapat dipasarkan. Pemanfaatan kembali limbah debu batu ini juga berkontribusi pada pengurangan emisi udara (emisi non-GRK), karena material yang sebelumnya berpotensi menjadi sumber debu kini dimanfaatkan kembali.

Non-Hazardous Waste

As part of its compliance with Law of the Republic of Indonesia No. 18 of 2008, Merdeka has established Waste Management Procedures. These procedures cover the collection, delivery, and transportation of domestic waste, including management at Temporary Storage Sites (TPS) and the utilization of waste by third parties.

In managing non-biodegradable inorganic waste, Merdeka applies the Reduce, Reuse, Recycle (3R) principle to minimize the generation of non-hazardous waste and trash. At the Wetar Copper Mine, used tires are utilized for slope reinforcement and sediment pond embankments. Meanwhile, organic waste is processed through composting and utilized for recycling or reuse.

Merdeka collaborates with local communities to support recycling programs for both organic and inorganic waste that hold economic value. At the Tujuh Bukit Gold Mine, food waste is utilized by the Community Development Group (PEGA) as livestock feed and for maggot farming, while food packaging is repurposed into plastic pellets. At the Konawe Nickel Mine, used tires are repurposed for gardens and flower pots. Meanwhile, at the AIM Plant, used cooking oil is utilized by a third party as feedstock for biodiesel production.

This approach reflects Merdeka's commitment to responsible waste management while making a positive contribution to the local economy, in line with the principles of sustainability and compliance with applicable regulations.

One of our main contractors has implemented a waste utilization program, which includes the reuse of used liners as a base layer for the camp facility washing area, the use of packaging wood to produce pallets, and the repurposing of light steel waste into cable signs.

In addition, the contractor has introduced an innovation by repurposing generated stone dust waste into value-added products such as bricks and paving blocks that can be commercially marketed. This reuse of stone dust waste also contributes to reducing toxic emissions (non-GHG emissions), as materials that would otherwise become a source of dust are effectively reutilized.

Volume Limbah Bahan Beracun Berbahaya [306-3][306-4][306-5][14.5.4][14.5.5][14.5.6][F.13] Volume of Hazardous and Toxic Waste

No.	Jenis Limbah B3 Type of Hazardous Waste	Masuk (Ton) In (Tonnes)		Keluar (Ton) Output (Tonnes)		Sisa (Ton) Remaining (Tonnes)		
		Saldo Awal Opening Balance	Limbah B3 yang dihasilkan [GRI 306-3] Hazardous Waste Generated	Pemanfaatan/ Pengolahan Limbah B3 [GRI 306-4] Utilization/Treatment of Hazardous Waste	Pembuangan Limbah B3 [GRI 306-5] Disposal of Hazardous Waste			
				Jumlah	Metode (Reduce/ Reuse/ Recycle) Method (Reduce/ Reuse/ Recycle)			
1	Majun Bekas Used Materials	3.76	62.43			62.54	pihak ketiga third party	3.65
2	Filter Bekas Used Filters	10.45	109.87			110.33	pihak ketiga third party	9.99
3	<i>Contaminated Goods</i>	56.91	563.90			598.88	pihak ketiga third party	21.93
4	Pelumas Bekas Used Lubricants	49.36	1,632.73	36.00	daur ulang recycle	1,548.51	pihak ketiga third party	97.58
5	Lainnya Others	69.36	62,938.64	-		62,955.95	pihak ketiga third party	52.06
	Total	189.84	65,307.57	36.00		65,276.21		185.21

Volume Limbah Non-B3 yang Dihasilkan dan Dimanfaatkan Kembali [14.5.4][14.5.5][14.5.6][F.13]
Volume of Non-B3 Waste Generated and Reused

No.	Jenis Sampah Umum General Waste	Limbah umum yang dihasilkan General Waste generated (Tonnes) [306-3]	Limbah umum yang dimanfaatkan atau diolah kembali General waste reused or reprocessed [306-4]		Limbah umum yang dibuang ke tempat pembuangan akhir General Waste disposed (Tonnes) [306-5]
			Ton	Metode Pengolahan Processing Method	
1	Kardus bekas Cardboards waste	448.39	7.00	Di daur ulang oleh IMIIP dan dikelola oleh koperasi di sekitar tambang BSI. Recycled by IMIIP and managed by cooperatives in the vicinity of the BSI mine.	441.39
2	Sampah Dapur (sisa makanan) Kitchen waste	1,142.82	165.80	Dimanfaatkan sebagai pakan ternak dan untuk budidaya maggot oleh Kelompok Masyarakat binaan BSI, dan sebagai pakan lele di Desa Makarti (MTI), serta pembuatan kompos organik di Pani. Used as livestock feed and for maggot farming by the BSI-supported community group, as catfish feed in Makarti Village (MTI), and for making organic compost in Pani.	977.02
3	Kemasan Packaging	688.94	7.79	Dikelola oleh koperasi untuk diproses menjadi pellet plastik di BSI. Managed by a cooperative to be processed into plastic pellets at BSI.	681.15
4	Limbah kayu Wood waste	1,864.82	-	-	1,864.82
5	Minyak Goreng Bekas Used cooking oil	20.37	19.21	Dikirim ke pihak ketiga untuk diproses menjadi biodiesel di MTI. Sent to a third party to be processed into biodiesel at MTI.	1.16
6	Sampah Plastik Plastic waste	910.57	-	Dikirim ke masyarakat sekitar untuk pemanfaatan sebagai pot tanaman dan dimanfaatkan kembali sebagai penguat lereng dan tanggul sediment pond. Distributed to the local community for use as plant pots and reused as slope and sediment pond embankment reinforcements.	910.57
7	Lainnya Others	5,154.88	1,945.57		3,209.31
Total		10,230.79	2,145.38		8,085.42

Tailing [14.6.1][14.6.2][14.6.3]

Meskipun pada tahun 2025 Merdeka belum memiliki fasilitas penyimpanan tailing, perusahaan telah menyusun rencana pengelolaan tailing untuk memastikan timbulan, pengelolaan, dan pembuangan tailing di masa mendatang dilakukan secara aman dan bertanggung jawab. Komitmen ini tercermin dalam Kebijakan Tailing Merdeka, yang mencakup penerapan praktik terbaik di seluruh tahapan pengelolaan tailing.

Kebijakan ini menitikberatkan pada upaya meminimalkan dampak negatif terhadap pekerja, masyarakat, lingkungan, dan menjaga kepatuhan terhadap peraturan. Strategi yang diterapkan mencakup perencanaan komprehensif, penggunaan teknologi mutakhir, serta pengawasan yang ketat untuk memastikan pengelolaan tailing di masa depan sesuai dengan standar keselamatan, keberlanjutan, dan peraturan yang berlaku.

Tailings

Although in 2025 Merdeka did not yet have tailings storage facilities, the company has developed a tailings management plan to ensure that future tailings generation, management, and disposal are conducted safely and responsibly. This commitment is reflected in Merdeka's Tailings Policy, which encompasses the implementation of best practices across all stages of tailings management.

This policy emphasizes efforts to minimize negative impacts on workers, communities, and the environment, while ensuring compliance with regulations. The strategies implemented include comprehensive planning, the use of cutting-edge technology, and strict oversight to ensure future tailings management aligns with safety, sustainability, and applicable regulatory standards.

Pendekatan Merdeka mencakup seluruh siklus pengelolaan tailing, mulai dari perancangan, konstruksi, operasional, hingga pemantauan fasilitas penyimpanan tailing. Pendekatan ini menekankan identifikasi dan pengurangan risiko, serta mitigasi dampak jangka panjang yang mungkin timbul bagi manusia dan lingkungan. Selain itu, pertimbangan terhadap perubahan iklim diterapkan pada setiap tahap pengelolaan untuk memastikan praktik yang berkelanjutan.

Merdeka akan secara proaktif melibatkan pemangku kepentingan sepanjang siklus hidup tailing, mendorong komunikasi terbuka, pertukaran pengetahuan, dan inisiatif edukasi terkait pengelolaan tailing yang efektif menerapkan aturan dalam *Global Industry Standard on Tailings Management* (GISTM). Pendekatan ini juga mencakup partisipasi masyarakat lokal dan pihak terkait lainnya untuk memastikan pengelolaan tailing dilaksanakan secara transparan dan akuntabel.

Aspek penting dalam komitmen kami adalah tinjauan independen yang dilakukan pada berbagai tahap, termasuk desain, konstruksi, operasi, dan penutupan fasilitas pengelolaan tailing. Peninjauan independen ini akan memastikan bahwa Merdeka melakukan penilaian yang berbasis pengetahuan interdisipliner, memastikan bahwa desain dan pengoperasian fasilitas tailing konsisten dengan standar industri, mengidentifikasi area di mana langkah-langkah pengurangan risiko mungkin diperlukan, memberikan saran yang dapat menambah nilai pada pengoperasian, penutupan, dan pemeliharaan jangka panjang fasilitas tailing yang aman, termasuk kinerja lingkungan fasilitas tailing, dengan aliran air yang terdampak tambang dan kualitas air terkait sebagai komponen penting, memastikan keselamatan dan tata kelola fasilitas tailing, memberikan panduan dan dukungan teknis ahli sepanjang siklus hidup fasilitas tersebut, dan objektif terhadap praktik pengelolaan tailing, guna menjaga standar tertinggi dan memastikan keberlanjutan serta kepatuhan terhadap peraturan yang berlaku.

Untuk memperkuat tata kelola pengelolaan tailing, Merdeka mengakui pentingnya strategi yang komprehensif dalam pengelolaan tailing, yang merupakan aspek krusial dalam operasi pertambangan dan pengolahan mineral. Oleh karena itu, Merdeka membentuk Komite Tinjauan Tailing (TRC) yang dipimpin oleh *Chief Operating Officer* (COO) dan Senior Manajemen Lapangan. Anggota komite ini mencakup perwakilan dari berbagai fungsi, seperti departemen tailing, operasi, risiko, keberlanjutan, dan konstruksi.

Komite ini bertanggung jawab untuk melaksanakan rekomendasi dari Dewan Peninjauan Tailing Independen, memberikan pembaruan berkala, dan mengawasi evaluasi kinerja sepanjang tahap pengembangan, operasi, dan penutupan fasilitas tailing. *Chief Operating Officer* (COO), yang juga menjabat sebagai ketua komite Bersama Senior Manajemen Lapangan, mengadakan pertemuan rutin untuk meninjau limbah tambang internal dan secara langsung melaporkan hasilnya kepada Presiden Direktur.

Merdeka's approach covers the entire tailings management cycle, from design, construction, and operations to the monitoring of tailings storage facilities. This approach emphasizes risk identification and reduction, as well as the mitigation of long-term impacts that may arise for humans and the environment. Additionally, considerations regarding climate change are applied at every stage of management to ensure sustainable practices.

Merdeka will proactively engage stakeholders throughout the tailings lifecycle, fostering open communication, knowledge exchange, and educational initiatives regarding effective tailings management that adheres to the *Global Industry Standard on Tailings Management* (GISTM). This approach also includes the participation of local communities and other relevant parties to ensure that tailings management is carried out transparently and accountably.

A key aspect of our commitment is the independent review conducted at various stages, including the design, construction, operation, and closure of tailings management facilities. These independent reviews will ensure that Merdeka conducts assessments based on interdisciplinary knowledge, ensuring that the design and operation of tailings facilities are consistent with industry standards, identifying areas where risk mitigation measures may be required, and providing recommendations that add value to the operation, closure, and long-term maintenance of safe tailings facilities, including the environmental performance of the tailings facilities, with mine-affected water flows and related water quality as key components, ensuring the safety and governance of the tailings facilities, providing expert guidance and technical support throughout the facility's lifecycle, and maintaining objectivity regarding tailings management practices to uphold the highest standards and ensure sustainability and compliance with applicable regulations.

To strengthen tailings management governance, Merdeka recognizes the importance of a comprehensive strategy for tailings management, which is a crucial aspect of mining and mineral processing operations. Therefore, Merdeka has established a Tailings Review Committee (TRC) led by the Chief Operating Officer (COO) and Senior Field Management. Committee members include representatives from various functions, such as the tailings, operations, risk, sustainability, and construction departments.

This committee is responsible for implementing recommendations from the Independent Tailings Review Board, providing periodic updates, and overseeing performance evaluations throughout the development, operation, and closure phases of tailings facilities. The Chief Operating Officer (COO), who also serves as the committee chair alongside Senior Field Management, holds regular meetings to review internal mining waste and directly reports the results to the President Director.

Untuk memastikan pengelolaan tailing yang terstruktur dan bertanggung jawab, tugas-tugas *Tailings Principal, Engineer of Record*, dan Manajer Konstruksi Fasilitas Tailing telah ditetapkan. Penunjukan peran-peran kunci ini bertujuan untuk memastikan bahwa setiap langkah dalam pengelolaan tailing dilakukan dengan hati-hati dan sesuai dengan praktik terbaik yang mendukung keberlanjutan dan kepatuhan terhadap standar keselamatan yang ketat.

Tambang Emas Tujuh Bukit mengolah bijih emasnya dengan metode *heap leach*, di mana tumpukan bijih emas dialiri larutan natrium sianida untuk menghasilkan larutan kaya hasil pelindian (*Pregnant Leach Solution/PLS*). Proses ini tidak menghasilkan tailing. Bijih yang telah diproses tetap berada di lokasi *heap leach*, dengan permukaannya direklamasi di kemudian hari. Tambang Tembaga Wetar juga menggunakan metode *heap leach*, dengan menggunakan asam sulfat untuk melarutkan tembaga ke dalam larutan kaya hasil pelindian. Bijih yang telah diproses tetap berada di lokasi *heap leach* dan kemudian dimanfaatkan kembali sebagai bahan baku untuk pabrik pirit MTI. [14.5.5]

Pabrik MTI menghasilkan tailing, yang dibuang dengan aman di fasilitas limbah B3 yang dikelola oleh PT Indonesia Morowali Industrial Park (IMIP), operator kawasan industri tempat Pabrik MTI berlokasi. Tailing yang dihasilkan oleh pabrik AIM MTI diserahkan kepada pihak ketiga yang memiliki izin resmi sesuai dengan peraturan perundang-undangan yang berlaku.

Emisi Udara [3-3]

Merdeka menempatkan pengelolaan emisi udara sebagai salah satu aspek penting dalam operasional perusahaan, mengingat potensi dampaknya yang signifikan terhadap lingkungan, kesehatan karyawan, dan masyarakat sekitar. Emisi udara yang tidak dikendalikan dapat menimbulkan pencemaran, menurunkan kualitas hidup, serta meningkatkan tekanan dari regulasi lingkungan yang semakin ketat. Oleh karena itu, Merdeka berkomitmen untuk secara proaktif menangani dan memitigasi emisi udara, dengan tujuan memastikan keberlanjutan operasional dan mempertahankan reputasi positif di mata pemangku kepentingan.

Sebagai bagian dari pengelolaan emisi udara, Merdeka mengacu pada Peraturan Menteri Lingkungan Hidup dan Kehutanan Republik Indonesia No. 11 Tahun 2021 tentang Baku Mutu Emisi Mesin dengan Pembakaran Dalam. Peraturan ini menjadi pedoman utama untuk seluruh kegiatan operasional yang menggunakan mesin berbahan bakar dalam, termasuk genset. Dengan penerapan standar ini, Merdeka memastikan emisi yang dihasilkan tetap berada dalam batas yang diperbolehkan, sekaligus memperkuat kepatuhan terhadap regulasi nasional dan komitmen perusahaan terhadap prinsip keberlanjutan.

To ensure structured and responsible tailings management, the roles of *Tailings Principal, Engineer of Record*, and *Tailings Facility Construction Manager* have been established. The designation of these key roles aims to ensure that every step in tailings management is carried out carefully and in accordance with best practices that support sustainability and compliance with strict safety standards.

The Tujuh Bukit Gold Mine processes its gold ore using the *heap leach method*, in which piles of gold ore are leached with a sodium cyanide solution to produce pregnant leach solution. This process does not generate tailings. The processed ore remains at the *heap leach site*, with the surface to be reclaimed at a later date. The Wetar Copper Mine also uses the *heap leach method*, employing sulfuric acid to dissolve copper into the leach solution. The processed ore remains at the *heap leach site* and is subsequently reused as feedstock for the MTI pyrite plant.

The MTI plant produces tailings, which are safely disposed of at a hazardous and toxic waste facility managed by PT Indonesia Morowali Industrial Park (IMIP), the operator of the industrial park where the MTI plant is located. The tailings produced by the AIM MTI plant are transferred to a license third-party entity in compliance with applicable laws and regulations.

Air Quality

Merdeka prioritizes air emissions management as a critical aspect of its operations, given the significant potential impact on the environment, employee health, and surrounding communities. Uncontrolled air emissions can cause pollution, lower quality of life, and increase pressure from increasingly stringent environmental regulations. Therefore, Merdeka is committed to proactively addressing and mitigating air emissions, with the aim of ensuring operational sustainability and maintaining a positive reputation in the eyes of stakeholders.

As part of its air emissions management, Merdeka adheres to Regulation of the Minister of Environment and Forestry of the Republic of Indonesia No. 11 of 2021 on Emission Standards for Internal Combustion Engines. This regulation serves as the primary guideline for all operational activities utilizing internal combustion engines, including generators. By implementing these standards, Merdeka ensures that emissions remain within permissible limits, while strengthening compliance with national regulations and the company's commitment to sustainability principles.

Merdeka juga memiliki Kebijakan Emisi Udara yang mencakup komitmen perusahaan untuk melindungi kesehatan manusia dan lingkungan dari dampak negatif emisi udara. Kebijakan Emisi Udara tersebut juga menyatakan komitmen Merdeka untuk mencegah dan mengurangi emisi udara di seluruh wilayah operasional serta sepanjang rantai pasok Merdeka. Kebijakan ini sejalan dengan regulasi yang berlaku dan mencakup pengelolaan emisi yang meliputi, namun tidak terbatas pada, PM_{2.5}, PM₁₀, TSP, SO_x, NO_x, CO, Hg, dan emisi zat-zat yang dapat merusak lapisan ozon (*Ozone Depleting Substances/ODS*).

Merdeka secara periodik melakukan pemantauan, pengelolaan, dan pelaporan emisi udara kepada instansi pemerintah yang berwenang. Perusahaan juga mengadopsi teknologi dan menerapkan langkah-langkah pencegahan untuk meminimalkan dampak yang timbul dari emisi udara, dengan tujuan untuk menjaga kualitas lingkungan dan kesehatan masyarakat sekitar.

Sebagai bagian dari komitmen tersebut, Merdeka melakukan penilaian potensi dampak emisi udara terhadap kesehatan manusia, keselamatan, dan lingkungan, serta melakukan tindakan perbaikan berkelanjutan untuk mengurangi dampak negatif. Sejalan dengan komitmen ini, Merdeka juga mempromosikan perspektif siklus hidup kepada para pemasok melalui pelatihan yang bertujuan untuk mendorong rantai pasokan agar mengurangi timbulnya emisi udara.

Komite Keberlanjutan Merdeka bertanggung jawab atas formulasi strategi dan pengawasan pelaksanaan Kebijakan Emisi Udara. Komite ini secara berkala melaporkan pelaksanaan kebijakan tersebut kepada Direksi. Kepala Teknik Tambang (KTT) atau General Manager dari entitas anak bertanggung jawab untuk mengomunikasikan kebijakan tersebut serta melakukan pemantauan untuk memastikan bahwa kebijakan emisi udara Merdeka dijalankan dengan efektif dan sesuai dengan standar yang ditetapkan.

Hasil Pengukuran beban emisi udara di wilayah operasi Merdeka adalah sebagai berikut: [305-7][14.3.2]
The results of air emissions measurements in Merdeka's operational areas are as follows:

Jenis Emisi Emission Type	Beban Emisi tahun 2025* (Ton) Emission in 2025 (Tonnes)
SO ₂	14.84
NO ₂	498.89
PM	10.35
CO	56.40

* Total beban emisi untuk BSI, BKP-BTR, SCM dan MTI/Total emission for BSI, BKP-BTR, SCM and MTI

Emisi Zat Perusak Ozon

Bahan Perusak Ozon adalah senyawa kimia yang dapat merusak lapisan ozon di stratosfer. Lapisan ozon memainkan peran penting sebagai pelindung alami bumi dari radiasi *ultraviolet* (UV) berbahaya yang dipancarkan oleh matahari. Tanpa lapisan ozon yang cukup, dampak buruknya termasuk peningkatan risiko kanker kulit, katarak, dan kerusakan pada ekosistem.

Merdeka also has an Toxic Emissions Policy that outlines the company's commitment to protecting human health and the environment from the negative impacts of air emissions. The Toxic Emissions Policy also states Merdeka's commitment to preventing and reducing air emissions across all operational areas and throughout its supply chain. This policy aligns with applicable regulations and covers emissions management, including but not limited to PM_{2.5}, PM₁₀, TSP, SO_x, NO_x, CO, Hg, and emissions of ozone-depleting substances (ODS).

Merdeka periodically monitors, manages, and reports air emissions to the relevant government authorities. The company also adopts technologies and implements preventive measures to minimize the impacts arising from air emissions, with the aim of maintaining environmental quality and the health of the surrounding community.

As part of this commitment, Merdeka assesses the potential impacts of air emissions on human health, safety, and the environment, and implements continuous improvement measures to reduce negative impacts. In line with this commitment, Merdeka also promotes a life-cycle perspective to suppliers through training aimed at encouraging the supply chain to reduce the generation of air emissions.

Merdeka's Sustainability Committee is responsible for formulating strategies and overseeing the implementation of the Air Emissions Policy. This committee regularly reports on the implementation of the policy to the Board of Directors. The Head of Tehnical Mining (KTT) or General Manager of the subsidiary is responsible for communicating the policy and conducting monitoring to ensure that Merdeka's air emissions policy is implemented effectively and in accordance with established standards.

Ozone-Depleting Substance Emissions

Ozone-depleting substances are chemical compounds that can damage the ozone layer in the stratosphere. The ozone layer plays a vital role as the Earth's natural shield against harmful ultraviolet (UV) radiation emitted by the sun. Without a sufficient ozone layer, the adverse effects include an increased risk of skin cancer, cataracts, and damage to ecosystems.

Sebagai perusahaan yang berkomitmen terhadap prinsip keberlanjutan, Merdeka mengambil langkah-langkah konkret untuk meminimalkan dampak terhadap lapisan ozon. Sepanjang tahun 2025, Merdeka memastikan bahwa semua perangkat pendingin udara yang digunakan tidak mengandung *chlorofluorocarbon* (CFC), yang dikenal sebagai salah satu senyawa bahan perusak ozon utama. Sebagai penggantinya, Merdeka menggunakan alat pendingin ramah lingkungan yang tidak berkontribusi pada penipisan ozon. [305-6]

Perubahan Iklim [3-3]

Di Merdeka, energi merupakan elemen krusial yang mendukung seluruh kegiatan operasional, mulai dari penambangan hingga pengolahan logam dan mineral. Namun, penggunaan energi juga menjadi kontributor utama emisi gas rumah kaca (GRK) yang berdampak pada perubahan iklim. Untuk itu, efisiensi dan inovasi dalam pemanfaatan energi menjadi prioritas perusahaan, sebagaimana tercermin dalam Kebijakan Perubahan Iklim. Merdeka melaksanakan berbagai program untuk mendorong substitusi energi yang inovatif serta peningkatan efisiensi sebagai bagian dari komitmen perusahaan dalam menghadapi tantangan global.

Merdeka menyadari bahwa perubahan iklim bukan hanya menjadi isu lingkungan, tetapi juga merupakan ancaman signifikan terhadap kelangsungan bisnis pertambangan. Perubahan cuaca ekstrem, seperti siklon tropis dan kekeringan berkepanjangan, telah menimbulkan gangguan operasional yang serius, termasuk kerusakan infrastruktur dan terganggunya pasokan bahan baku.

Kesadaran ini mendorong Merdeka untuk tidak hanya meningkatkan efisiensi operasional, tetapi juga memperkuat tanggung jawab sosial dan membangun kepercayaan pemangku kepentingan melalui transparansi serta komitmen terhadap keberlanjutan lingkungan. Melalui Kebijakan Perubahan Iklim, Merdeka berkomitmen untuk mematuhi seluruh regulasi di Indonesia dan menyelaraskan operasional dengan instrumen internasional, termasuk mendukung target Perjanjian Paris untuk membatasi kenaikan suhu global di bawah 2°C.

Sebagai wujud komitmen, Merdeka aktif mengimplementasikan inisiatif pengurangan emisi GRK melalui penelitian, penerapan inovasi energi, efisiensi, dan partisipasi dalam program offset karbon. Praktik tata kelola, pelibatan pemangku kepentingan, dan pengungkapan informasi terkait perubahan iklim telah diintegrasikan ke dalam proses pengambilan keputusan bisnis. Risiko dan peluang yang terkait dengan perubahan iklim, termasuk risiko fisik dan transisi, dievaluasi secara berkala untuk memastikan keberlanjutan bisnis jangka panjang.

Selain itu, Merdeka mendorong pendekatan siklus hidup di seluruh rantai pasokan untuk mengurangi jejak karbon, sekaligus berkontribusi pada upaya global menuju emisi GRK nol-bersih, sebagaimana terdapat [Kebijakan Perubahan Iklim Merdeka](#).

As a company committed to the principles of sustainability, Merdeka is taking concrete steps to minimize its impact on the ozone layer. Throughout 2025, Merdeka ensures that all air conditioning units used do not contain chlorofluorocarbons (CFCs), which are known as one of the primary ozone-depleting substances. As an alternative, Merdeka uses environmentally friendly cooling systems that do not contribute to ozone depletion.

Climate Change

At Merdeka, energy is a crucial element supporting all operational activities, from mining to metal and mineral processing. However, energy use is also a major contributor to greenhouse gas (GHG) emissions that impact climate change. Therefore, efficiency and innovation in energy utilization are company priorities, as reflected in the Climate Change Policy. Merdeka implements various programs to promote innovative energy substitution and efficiency improvements as part of the company's commitment to addressing global challenges.

Merdeka recognizes that climate change is not merely an environmental issue but also a significant threat to the sustainability of the mining business. Extreme weather events, such as tropical cyclones and prolonged droughts, have caused serious operational disruptions, including infrastructure damage and disruptions to raw material supplies.

This awareness drives Merdeka not only to improve operational efficiency but also to strengthen social responsibility and build stakeholder trust through transparency and a commitment to environmental sustainability. Through its Climate Change Policy, Merdeka is committed to complying with all regulations in Indonesia and aligning its operations with international instruments, including supporting the Paris Agreement's target to limit global temperature rise to below 2°C.

As a demonstration of this commitment, Merdeka actively implements initiatives to reduce GHG emissions through research, the adoption of energy innovations, efficiency measures, and participation in carbon offset programs. Governance practices, stakeholder engagement, and disclosure of climate-related information have been integrated into business decision-making processes. Risks and opportunities related to climate change, including physical and transition risks, are evaluated periodically to ensure long-term business sustainability.

In addition, Merdeka promotes a life cycle perspective across the supply chain to reduce its carbon footprint, while contributing to global efforts toward net-zero GHG emissions, as stated in the [Merdeka's Climate Change Policy](#).

Tata Kelola

Manajemen perubahan iklim yang efektif membutuhkan komitmen yang teguh, panduan yang jelas, serta komunikasi yang mudah dipahami oleh seluruh karyawan. Direksi Merdeka bertanggung jawab untuk memastikan bahwa tujuan dan strategi perubahan iklim dijalankan sesuai dengan peta jalan yang telah ditetapkan.

Pengawasan terkait perubahan iklim dilakukan oleh Komite Keberlanjutan, yang bertugas merumuskan strategi dan mengawasi kinerja dalam menghadapi tantangan perubahan iklim. Komite ini memantau emisi GRK dan kemajuan peta jalan nol-bersih Merdeka. Pertemuan periodik Komite Keberlanjutan dipimpin oleh Presiden Direktur dan dihadiri oleh Komite Eksekutif, General Manajer Operasi, Fungsi Pendukung lain, dan Manajer Keberlanjutan sebagai anggota.

Kemudian, Merdeka telah membentuk Kelompok Kerja Energi dan Perubahan Iklim sebagai wadah kolaboratif untuk mendorong implementasi Kebijakan Perubahan Iklim dan Kebijakan Energi, memperkuat kerja sama lintas operasi, berbagi praktik terbaik, meningkatkan kapasitas internal, serta mengkonsolidasikan pembaruan kemajuan terkait manajemen energi dan inisiatif perubahan iklim.

Pengawasan pelaksanaan strategi dekarbonisasi Merdeka oleh Komite Keberlanjutan dibantu oleh Kelompok Kerja Energi dan Perubahan Iklim. Kelompok Kerja Energi dan Perubahan Iklim memberikan laporan secara berkala kepada Komite Keberlanjutan terkait dekarbonisasi Merdeka. Sementara itu, Kepala Teknik Tambang (KTT) atau General Manager bertanggung jawab dalam mengomunikasikan dan memantau pelaksanaan Kebijakan Perubahan Iklim Merdeka.

Manajemen Risiko

Perubahan iklim dan transisi menuju ekonomi rendah karbon memberikan dampak signifikan terhadap operasional dan keberlanjutan bisnis Merdeka. Untuk menghadapi tantangan ini, Manager ESG & Perubahan Iklim, berkoordinasi dengan GM Risiko dan Kesehatan dan Keselamatan Kerja (K3), bertanggung jawab dalam melakukan penilaian dan pengelolaan risiko serta peluang terkait perubahan iklim di seluruh aspek operasional perusahaan.

Hasil dari penilaian risiko perubahan iklim digunakan sebagai salah satu faktor utama dalam perencanaan bisnis dan pengambilan keputusan investasi. Penilaian tersebut mencakup seluruh aset yang dimiliki saat ini, aset yang sedang dalam tahap pengembangan, potensi akuisisi aset baru, serta seluruh rantai pasokan, untuk memastikan adaptasi dan mitigasi risiko dilakukan secara holistik dan menyeluruh.

Governance

Effective climate change management requires a firm commitment, clear guidelines, and communication that is easily understood by all employees. Merdeka's Board of Directors is responsible for ensuring that climate change goals and strategies are implemented in accordance with the established roadmap.

Oversight of climate change matters is carried out by the Sustainability Committee, which is tasked with formulating strategies and monitoring performance in addressing climate change challenges. This committee monitors GHG emissions and the progress of Merdeka's net-zero roadmap. Periodic meetings of the Sustainability Committee are chaired by the President Director and attended by the Executive Committee, the General Manager of Operations, other Support Functions, and the Sustainability Manager as members.

Furthermore, Merdeka has established the Energy and Climate Change Working Group as a collaborative platform to drive the implementation of the Climate Change Policy and Energy Policy, strengthen cross-operational collaboration, share best practices, enhance internal capacity, and consolidate updates on progress related to energy management and climate change initiatives.

The Sustainability Committee's oversight of Merdeka's decarbonization strategy is supported by the Energy and Climate Change Working Group. The Energy and Climate Change Working Group provides periodic reports to the Sustainability Committee regarding Merdeka's decarbonization efforts. Meanwhile, the Head of Technical Mining (KTT) or General Manager is responsible for communicating and monitoring the implementation of Merdeka's Climate Change Policy.

Risk Management

Climate change and the transition to a low-carbon economy have a significant impact on Merdeka's operations and business sustainability. To address these challenges, the ESG & Climate Change Manager, in coordination with the GM of Risk and Occupational Health and Safety (OHS), are responsible for assessing and managing risks and opportunities related to climate change across all aspects of the company's operations.

The results of the climate change risk assessment are used as a key factor in business planning and investment decision-making. The assessment covers all currently owned assets, assets under development, potential new asset acquisitions, and the entire supply chain, to ensure that risk adaptation and mitigation are carried out holistically and comprehensively.

Preserving the Environment

Merdeka menyadari bahwa dinamika risiko perubahan iklim dapat berubah seiring waktu. Oleh karena itu, aspek perubahan iklim secara berkala dimasukkan ke dalam kerangka penilaian risiko perusahaan untuk memastikan respons yang relevan dan tepat waktu.

Merdeka telah melakukan penilaian risiko perubahan iklim dengan mengadopsi berbagai standar dan pedoman internasional untuk memastikan pendekatan yang komprehensif dan sesuai dengan praktik terbaik global. Standar yang digunakan meliputi *Task Force on Climate-related Financial Disclosures* (TCFD) untuk mengintegrasikan risiko dan peluang iklim ke dalam strategi bisnis, ISO 14001:2015 sebagai kerangka manajemen lingkungan, *Carbon Disclosure Project* (CDP) untuk pengungkapan data emisi dan risiko iklim, *Greenhouse Gas Protocol* (GHG Protocol) untuk pengukuran dan pelaporan emisi gas rumah kaca, *Intergovernmental Panel on Climate Change* (IPCC) untuk proyeksi dan analisis dampak perubahan iklim, serta *Global Reporting Initiative* (GRI) untuk pelaporan dampak lingkungan yang transparan dan akuntabel. Risiko transisi yang dihadapi Merdeka mencakup emisi saat ini dan proyeksi di masa depan, serta dampak dari kebijakan perubahan iklim baru yang diterapkan di Indonesia selama masa operasi bisnis perusahaan.

Risiko fisik terkait perubahan iklim yang disebabkan oleh perubahan jangka panjang dalam pola iklim dikategorikan menjadi peristiwa akut dan kronis. Peristiwa akut, seperti badai dan banjir ekstrem, dapat menyebabkan kerusakan langsung pada aset atau gangguan operasional. Sementara itu, peristiwa kronis, seperti kenaikan suhu rata-rata dan perubahan pola curah hujan, berpotensi memengaruhi kelangsungan operasi secara berkelanjutan.

Merdeka recognizes that the dynamics of climate change risks can evolve over time. Therefore, climate change considerations are periodically incorporated into the company's risk assessment framework to ensure relevant and timely responses.

Merdeka has conducted climate change risk assessments by adopting various international standards and guidelines to ensure a comprehensive approach aligned with global best practices. The standards used include the Task Force on Climate-related Financial Disclosures (TCFD) to integrate climate risks and opportunities into business strategy, ISO 14001:2015 as an environmental management framework, the Carbon Disclosure Project (CDP) for the disclosure of emissions data and climate risks, the Greenhouse Gas Protocol (GHG Protocol) for the measurement and reporting of greenhouse gas emissions, the Intergovernmental Panel on Climate Change (IPCC) for projections and analysis of climate change impacts, and the Global Reporting Initiative (GRI) for transparent and accountable environmental impact reporting. The transition risks faced by Merdeka include current emissions and future projections, as well as the impacts of new climate change policies implemented in Indonesia during the company's business operations.

Physical risks associated with climate change caused by long-term shifts in climate patterns are categorized into acute and chronic events. Acute events, such as extreme storms and floods, can cause direct damage to assets or operational disruptions. Meanwhile, chronic events, such as rising average temperatures and changes in rainfall patterns, have the potential to affect the sustainability of operations over the long term.

Identifikasi Risiko Transisi
Identification of Transition Risks

Pemicu Risiko Risks Trigger	Matrik risiko Risks Matrix	Risiko terkait dengan perubahan iklim Risks related to climate change	Dampak Finansial [201-2][14.2.2] Financial Impact	Strategi Mitigasi Mitigation Strategy
Kebijakan karbon Policy	Menengah Medium	Penerapan pajak karbon Carbon tax implementation	Pajak karbon belum diterapkan saat ini, namun pajak karbon sebesar Rp30.000/ tCO2e (sekitar USD2,10) rencananya akan diterapkan oleh pemerintah Indonesia pada tahun 2025 sehingga akan menyebabkan tambahan biaya operasional (OPEX) dan mengurangi margin laba operasional. The carbon tax is not currently in effect, but a carbon tax of IDR30,000/ tCO2e (approximately USD2.10) is planned to be implemented by the Indonesian government in 2025. This is expected to result in additional operational costs (OPEX) and reduce operational profit margins.	<ul style="list-style-type: none"> Pengurangan emisi cakupan 1 dan cakupan 2 sebesar 29% sampai dengan tahun 2030 dan net zero tahun 2050. Transisi ke Energi Baru Terbarukan (EBT) yang lebih rendah karbon mencakup pembelian Renewable Energy Certificate (REC), B35 & panel surya. Mengganti mesin lama yang masih menggunakan fosil fuel dengan mesin baru yang lebih irit bahan bakar. Reduction of Scope 1 and Scope 2 emissions by 29% until 2030 and achieving net zero by 2050. Transition to Lower Carbon Renewable Energy with Renewable Energy Certificate (REC) purchase, B35 and solar panels. Replacing old engines that still use fossil fuels with new, more fuelefficient engines

Pemicu Risiko Risks Trigger	Matrik risiko Risks Matrix	Risiko terkait dengan perubahan iklim Risks related to climate change	Dampak Finansial [201-2][14.2.2] Financial Impact	Strategi Mitigasi Mitigation Strategy
Pasar Market	Menengah Medium	Meningkatnya harga bahan baku dari supplier atau harga pekerjaan kontraktor. Increasing raw material prices from suppliers or contractor job prices	Kenaikan harga pekerjaan kontraktor atau harga bahan baku dari supplier yang disebabkan pajak karbon atau investasi teknologi yang dibebankan pada biaya operasional akan meningkatkan biaya operasional (OPEX) dan mengurangi margin laba operasional. The increase in contractor job prices or raw material prices from suppliers, caused by carbon taxes or technology investments charged to operational costs, will raise operational expenses (OPEX) and reduce operational profit margins.	Mendorong kontraktor untuk melakukan cara-cara mitigasi dampak perubahan yang efektif, misalnya menggunakan energi terbarukan (rendah karbon). Encouraging contractors to implement effective mitigation measures for climate impact, such as using renewable (lowcarbon) energy
Teknologi Technology	Tinggi High	Transisi ke teknologi yang lebih rendah karbon. Transition to lower carbon technology	Investasi teknologi rendah karbon akan meningkatkan biaya operasional (OPEX) dan mengurangi margin laba operasional dalam jangka pendek. Investments in low-carbon technology will increase operational costs (OPEX) and reduce operational profit margins in the short term	Meningkatkan kapasitas listrik dengan penggunaan panel surya untuk menggantikan energi yang bersumber dari bahan bakar fosil. Increasing electrical capacity through the use of solar panels to replace energy sourced from fossil fuels
Reputasi Reputation	Menengah Medium	Reputasi yang baik menjadi tantangan bagi Merdeka untuk menerapkan standar perubahan iklim yang tinggi. A good reputation poses a challenge for Merdeka in adopting high climate change standards.	Peningkatan indikator standar yang menuntut perusahaan untuk memperbaiki penanganan perubahan iklim dan lebih transparan berpotensi meningkatkan biaya operasional (OPEX) dan mengurangi margin laba operasi. The increase in standard indicators demanding improved climate change management and greater transparency has the potential to raise operational costs (OPEX) and reduce operating profit margins.	<ul style="list-style-type: none"> Pemetaan dan update secara periodik sistem atau standar perubahan iklim. Aktif berkontribusi dalam meningkatkan kesadaran pemangku kepentingan terhadap perubahan iklim. Periodic mapping and updates of climate change systems or standards. Actively contributing to raising stakeholder awareness of climate change.



Pani Gold Mine signed an REC Sale and Purchase Agreement with PT Management Energy Indonesia (PLN's subsidiary)

Identifikasi Risiko Fisik
Identification of Physical Risks

Pemicu Risiko Risks Trigger	Matrik risiko Risks Matrix	Risiko terkait dengan perubahan iklim Risks related to climate change	Dampak Finansial [201-2][14.2.2] Financial Impact	Strategi Mitigasi Mitigation Strategy
Risiko Akut Acute Risks				
Banjir air pasang Tidal flood	Tinggi High	<ul style="list-style-type: none"> Hambatan pengiriman peralatan pertambangan dapat menyebabkan target produksi tidak tercapai. Merusak infrastruktur penambangan, seperti pelabuhan, dan alat berat. Pengiriman hasil produksi pertambangan terhambat, sehingga menyebabkan biaya penalti/denda dari pembeli. Constraints in the delivery of mining equipment can lead to unmet production targets. Damage mining infrastructure, such as ports and heavy machinery. Hindered delivery of mining products can result in penalties or fines from buyers. 	<ul style="list-style-type: none"> Penurunan pendapatan perusahaan. Peningkatan biaya untuk penggantian atau perbaikan aset yang rusak. Pembayaran denda/ pinalti menyebabkan penurunan pendapatan. Decrease in company revenue Increase in costs for replacing or repairing damaged assets Payment of fines/ penalties result in a reduction in income. 	<ul style="list-style-type: none"> Melakukan penilaian risiko banjir air pasang guna mengidentifikasi daerah rawan banjir untuk semua aset utama. Menyertakan bahaya banjir dalam rencana tanggap darurat. Mengembangkan sistem <i>Emergency Response Plan</i> (ERP), yang mencakup kesiapsiagaan, respons, mitigasi, dan pemulihan. Menyiapkan tim tanggap darurat berkala, koordinasi dengan pihak eksternal, serta pemeliharaan peralatan dan perlengkapan darurat. Asuransi aset. Penanaman pohon mangrove untuk mencegah abrasi. Conducting a risk assessment of tidal floods to identify flood-prone areas for all major assets. Including flood hazards in the emergency response plan. Developing an Emergency Response System, covering preparedness, response, mitigation, and recovery. Establishing an emergency response team, conducting regular emergency training programs, coordinating with external parties, and maintaining emergency equipment and supplies. Asset insurance. Planting mangrove trees to prevent erosion.



Nursery at Pani Gold Mine



Solar panel at Wetar Copper Mine

Pemicu Risiko Risks Trigger	Matrik risiko Risks Matrix	Risiko terkait dengan perubahan iklim Risks related to climate change	Dampak Finansial [201-2][14.2.2] Financial Impact	Strategi Mitigasi Mitigation Strategy
Banjir daratan Inland flood	Rendah Low	<ul style="list-style-type: none"> Kerusakan infrastruktur pertambangan seperti jalan, jembatan, dan stockpile. Target produksi tidak tercapai akibat dari kerusakan infrastruktur pertambangan. Pengiriman hasil produksi pertambangan terhambat, sehingga menyebabkan biaya penalti/denda dari pembeli. Damage to mining infrastructure such as roads, bridges, and stockpiles. Production targets are not met due to mining infrastructure damage. Delivery of mining production is delayed, leading to penalty/fine costs from buyers. 	<ul style="list-style-type: none"> Meningkatnya biaya perbaikan infrastruktur. Penurunan pendapatan akibat penurunan volume penjualan. Pembayaran denda/ pinalti menyebabkan penurunan pendapatan. Increasing infrastructure repair costs. Decreased revenue due to a decline in sales volume. Payment of fines/ penalties leads to a reduction in income 	<ul style="list-style-type: none"> Desain pertambangan yang memasukkan risiko banjir. Identifikasi secara berkala stabilitas lereng di lokasi-lokasi kritis. Pemeliharaan secara berkala jalan operasional dan sistem pengelolaan air untuk memastikan drainase telah memadai. Pengembangan Rencana Tanggap Darurat untuk memastikan keselamatan pekerja, dan review dan pembaruan berkelanjutan terhadap Rencana Pengelolaan Air minimal setiap tahun Mining design that incorporates flood risks. Periodic identification of slope stability in critical locations. Regular maintenance of operational roads and water management systems to ensure adequate drainage. Development of an Emergency Response Plan to promote worker safety, and continuous review and updates to the Water Management Plan, at a minimum annually.

Preserving the Environment

Pemicu Risiko Risks Trigger	Matrik risiko Risks Matrix	Risiko terkait dengan perubahan iklim Risks related to climate change	Dampak Finansial [201-2][14.2.2] Financial Impact	Strategi Mitigasi Mitigation Strategy
Siklon tropis Tropical cyclone	Rendah Low	<ul style="list-style-type: none"> Kerusakan infrastruktur pertambangan seperti jalan, jembatan, dan stockpile Target produksi tidak tercapai akibat dari kerusakan infrastruktur pertambangan. Pengiriman hasil produksi pertambangan terhambat, sehingga menyebabkan biaya penalti/denda dari pembeli. Damage to mining infrastructure such as roads, bridges, and stockpiles. Failure to achieve production targets due to mining infrastructure damage. Delivery of mining production is hindered, leading to penalty/fine costs from buyers. 	<ul style="list-style-type: none"> Meningkatnya biaya perbaikan infrastruktur. Penurunan pendapatan akibat penurunan volume penjualan. Pembayaran denda/ pinalti menyebabkan perunan pendapatan. Increasing infrastructure repair costs. Decreased revenue due to a decline in sales volume. Payment of fines/ penalties resulting in a decrease in income. 	<ul style="list-style-type: none"> Memasukkan risiko siklon tropis menjadi salah satu pertimbangan risiko dalam penyusunan rencana target produksi. Meningkatkan daya tahan infrastruktur untuk menahan angin kencang dan hujan lebat. Incorporating the risk of tropical cyclones into the considerations for production target planning. Enhancing the resilience of infrastructure to withstand strong winds and heavy rainfall.



Installation of cocomech (slope revegetation) at Pani Gold Mine

Pemicu Risiko Risks Trigger	Matrik risiko Risks Matrix	Risiko terkait dengan perubahan iklim Risks related to climate change	Dampak Finansial [201-2][14.2.2] Financial Impact	Strategi Mitigasi Mitigation Strategy
Risiko Kronis Chronic Risks				
Panas ekstrem Extreme heat	Rendah Low	<ul style="list-style-type: none"> Suhu yang sangat tinggi dapat mengakibatkan kerusakan peralatan pertambangan seperti truk tambang, alat berat, dan peralatan lainnya overheating. Meningkatnya intensitas konsumsi bahan bakar truk yang digunakan untuk penyiraman jalan tambang dikarenakan debu. Produktivitas karyawan menurun. High temperatures can result in damage to mining equipment such as dump trucks, heavy machinery, and other equipment overheating. The increased fuel consumption intensity of trucks used for watering mining roads is due to dust. Decreased employee productivity 	<ul style="list-style-type: none"> Meningkatnya biaya perbaikan peralatan pertambangan. Meningkatnya biaya bahan bakar untuk truk air. Meningkatnya biaya untuk pembelian APD Increased costs for mining equipment repairs. Rising costs for fueling water trucks. Escalating expenses for the purchase of Personal Protective Equipment (PPE). 	<ul style="list-style-type: none"> Melakukan evaluasi rentang suhu operasional alat dan peralatan yang ada terhadap suhu ekstrem yang diproyeksikan. Melakukan penyiraman pada waktu yang tepat, yaitu ketika debu sudah mulai terbang. Menyediakan APD tambahan untuk melindungi pekerja dari paparan panas yang berlebihan. Conducting an evaluation of the operational temperature range of existing equipment and tools against the projected extreme temperatures. Watering should be performed at the appropriate time, specifically when dust start to become airborne. Providing additional Personal Protective Equipment (PPE) to protect workers from excessive heat exposure.
Kelangkaan air Water scarcity	Rendah Low	<ul style="list-style-type: none"> Jumlah sumber air menurun Ketersediaan air yang tidak mencukupi untuk proses pengolahan. Konflik dengan masyarakat lokal yang menyebabkan terhentinya operasional. Declining water sources Insufficient water availability for processing operations. Conflicts with the local community leading to operational disruptions. 	<ul style="list-style-type: none"> Peningkatan biaya operasional penggunaan teknologi dan fasilitas untuk mengurangi intensitas pemakaian air. Pendapatan menurun akibat dari terhambatnya proses pengolahan. Penurunan Pendapatan akibat penurunan produksi. Increased operational costs of using technology and facilities to reduce water usage intensity. Decreased revenue due to hindered processing operations. Revenue decline due to reduced production. 	<ul style="list-style-type: none"> Melakukan daur ulang air untuk mengurangi konsumsi air. Menggunakan air hujan untuk mengurangi konsumsi air tanah. Recycling water to reduce water consumption. Utilizing rainwater to decrease groundwater consumption.

Identifikasi Peluang Perubahan Iklim bagi Merdeka
Identification of Climate Change Opportunities for Merdeka

Jenis peluang Opportunities type	Peluang terkait dengan perubahan iklim Opportunities related to climate change	Dampak Finansial [201-2] Financial Impact
Efisiensi Sumber Daya Resources Efficiency	<ul style="list-style-type: none"> Melakukan daur ulang limbah. Mengurangi konsumsi air. Recycling waste. Reducing water consumption. 	<ul style="list-style-type: none"> Daur ulang limbah membantu mengurangi biaya pengangkutan limbah dan pembelian bahan baku. Pengurangan pengambilan air membantu mengurangi biaya kontribusi untuk pembelian air. Recycling waste reduces the cost of waste transportation and the purchase of raw materials. Reducing water intake decreases the cost contribution for purchasing water.
Sumber Energi Energy Sources	<ul style="list-style-type: none"> Penggunaan sumber energi rendah emisi. Penggunaan teknologi baru. Usage of low-emission energy sources. Adoption of new technologies. 	<ul style="list-style-type: none"> Penggantian genset menghemat penggunaan bahan bakar yang pada akhirnya mengurangi biaya operasional (OPEX). Replacing generators saves fuel consumption, ultimately reducing operational costs (OPEX).
Produk Product	<ul style="list-style-type: none"> Meningkatnya penjualan tembaga yang digunakan dalam infrastruktur energi terbarukan, seperti kabel, turbin angin dan panel surya. Meningkatnya penjualan nikel yang digunakan sebagai bahan baku baterai pada mobil listrik. Increasing sales of copper used in renewable energy infrastructure, such as cables, wind turbines, and solar panels. Growing sales of nickel used as a raw material for electric vehicle batteries. 	<ul style="list-style-type: none"> Peningkatan permintaan tembaga dan nikel berkontribusi untuk meningkatkan keuntungan. The increased demand for copper and nickel contributes to enhanced profits.



Solar-powered geotechnical monitoring system at Pani Gold Mine



Solar-powered Automatic Weather Station (AWS) at Pani Gold Mine

Strategi Dekarbonisasi Merdeka

- Substitusi energi**
 - Tambang Emas Tujuh Bukit telah menggunakan listrik bersih yang bersumber dari pembangkit listrik tenaga air (PLTA) melalui pembelian Renewable Energy Certificates (REC) dari PLN sejak tahun 2022.
 - Tambang Emas Pani akan mulai menggunakan listrik bersih yang bersumber dari pembangkit listrik tenaga air (PLTA) melalui pembelian Renewable Energy Certificates (REC) dari PLN, efektif sejak 1 Januari 2026.
 - Di Tambang Tembaga Wetar, Tambang Emas Tujuh Bukit, dan SCM telah menggunakan panel surya sebagai sumber energi terbarukan untuk mendukung kebutuhan operasional perusahaan.
- Efisiensi energi**

Setiap entitas anak Merdeka menjalankan program efisiensi energi yang dirancang untuk mencapai standar keberlanjutan global. Program ini mencakup penggantian peralatan pertambangan dengan teknologi berdaya bahan bakar lebih efisien, optimalisasi desain tambang berbasis data dan inovasi, serta pengembangan kompetensi teknis operator untuk mendukung operasional yang lebih ramah lingkungan dan berkelanjutan.
- Transisi ke bahan bakar terbarukan**

Semua entitas anak Merdeka mendukung upaya transisi ke energi terbarukan dengan mengadopsi penggunaan bahan bakar B40, yang merupakan campuran biomasa 40% dan solar dalam operasionalnya.
- Produk ramah lingkungan**

Merdeka berkontribusi pada ekonomi rendah karbon melalui pengolahan nikel sebagai bahan utama pendukung baterai kendaraan listrik, mendukung pengembangan transportasi berkelanjutan.

Merdeka's Decarbonization Strategy

- Energy Substitution**
 - The Tujuh Bukit Gold Mine has been using clean electricity sourced from hydropower (PLTA) through the purchase of Renewable Energy Certificates (REC) from PLN since 2022.
 - The Pani Gold Mine will begin using clean electricity sourced from hydropower (PLTA) through the purchase of Renewable Energy Certificates (REC) from PLN, effective January 1, 2026.
 - At the Wetar Copper Mine, Tujuh Bukit Gold Mine, and SCM, solar panels have been used as a renewable energy source to support the company's operational needs.
- Energy Efficiency**

Every Merdeka subsidiary implements an energy efficiency program designed to meet global sustainability standards. This program includes replacing mining equipment with more fuel-efficient technology, optimizing mine design based on data and innovation, and developing operators' technical competencies to support more environmentally friendly and sustainable operations.
- Transition to Renewable Fuels**

All Merdeka business entities support the transition to renewable energy by adopting the use of B40 fuel, a blend of 40% biomass and diesel, in their operations.
- Environmentally friendly products**

Merdeka contributes to a low-carbon economy by processing nickel as a key material for electric vehicle batteries, supporting the development of sustainable transportation.

Rencana Aksi Mengatasi Perubahan Iklim melalui Komitmen Nol-Bersih [3-3][F.12][2-25]

Perubahan iklim menimbulkan tantangan dan peluang finansial yang signifikan, baik pada masa kini maupun di masa depan. Sebagai bentuk komitmen terhadap perubahan iklim, Merdeka telah menerbitkan pernyataan komitmen nol bersih pada tahun 2050.

Sebagai tindak lanjut komitmen nol bersih Merdeka, kami telah menyusun GHG Emissions Reduction Roadmap sebagai berikut:

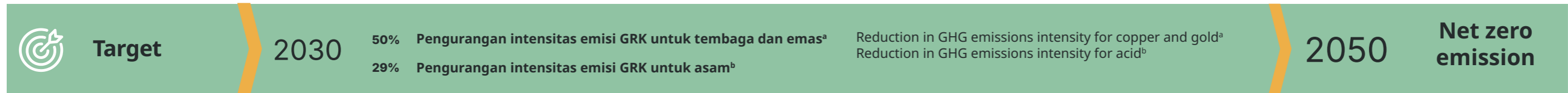
Action Plan to Address Climate Change through the Net-Zero Commitment

Climate change presents significant financial challenges and opportunities, both now and in the future. As form of its commitment to climate change, Merdeka has issued a net-zero commitment statement for 2050.

As a follow-up to Merdeka's net-zero commitment, we have developed the following GHG Emissions Reduction Roadmap:

PETA JALAN MERDEKA MENUJU NOL BERSIH

MERDEKA'S NET ZERO ROADMAP



DASAR - BASELINE

STRATEGI / STRATEGIES

2021

EMAS / GOLD
0.6 tCO₂e per oz Au

TEMBAGA/COPPER
3.6 tCO₂e per ton Cu

2023

ASAM/ACID
0.1 tCO₂e per ton acid (forecast based on first production)

<p>Substitusi Energi Energy Substitution</p> <p>Listrik terbarukan dari sumber panas bumi dan air. Renewable electricity from geothermal and hydro sources.</p>		<p>Sejak November 2022, BSI menggunakan listrik bersih dari PLTP dan PLTA melalui penandatanganan REC dengan PLN. Pada Oktober 2025, Pani menandatangani Perjanjian Jual Beli REC dengan anak perusahaan PLN. Pemanfaatan listrik bersih (PLTA) oleh Pani dimulai 1 Januari 2026.</p> <p>Since November 2022, BSI has utilized clean electricity sourced from geothermal and hydropower through the purchase of REC from PLN. In October 2025, Pani signed a REC Sale and Purchase Agreement with a PLN subsidiary. The use of clean electricity (hydropower) by Pani commenced on January 1, 2026.</p>	
<p>Substitusi Energi Energy Substitution</p> <p>Instalasi panel surya dan pembangkit listrik mikrohidro. Solar panel installation and micro hydro.</p>		<p>Proyek percontohan panel surya awal sebesar 0,2 MW pada tahun 2021. Rencana ekspansi untuk memasang panel surya dengan kapasitas lebih besar dan studi kelayakan untuk pembangkit listrik tenaga air mikro.</p> <p>Initial solar panel pilot project of 0.2 MW in 2021. Expansion plans to install solar panels with larger capacity and a feasibility study for micro-hydropower plants.</p>	
<p>Efisiensi Energi Energy Efficiency</p> <p>Meningkatkan efisiensi energi melalui teknologi dan inovasi. Improving energy efficiency through technology and innovations.</p>		<p>Ide-ide inovatif untuk meningkatkan efisiensi energi dan mengurangi emisi GRK. Pemanfaatan limbah di dalam kegiatan peledakan.</p> <p>Innovative ideas to improve energy efficiencies and reduce GHG emissions. Utilization of used oil in blasting activities.</p>	
<p>Rehabilitasi Lahan Land Rehabilitation</p> <p>Reklamasi lahan bekas tambang, program rehabilitasi daerah aliran sungai. Mined land reclamation, watershed rehabilitation program.</p>		<p>Rehabilitasi lahan merupakan persyaratan peraturan untuk operasi tambang Merdeka. Spesies pohon lokal ditanam untuk mengimbangi keanekaragaman hayati.</p> <p>Land rehabilitation is a regulatory requirement for Merdeka mine operations. Local tree species are planted for biodiversity offset.</p>	
<p>Offsetting</p> <p>Kompensasi lahan, restorasi hutan bakau, penghijauan. Land compensation, mangrove restoration, afforestation.</p>		<p>Memulai dan memantau program restorasi hutan bakau dan kompensasi lahan untuk meningkatkan offset GRK dari tahun ke tahun.</p> <p>Initiate and monitor mangrove restoration and land compensation programs to increase GHG offset year-on-year.</p>	

Mencapai emisi nol bersih pada tahun 2050 sebagai kontribusi untuk menahan kenaikan suhu rata-rata global di bawah 2°C dan berupaya untuk membatasi kenaikan suhu hingga 1,5°C di atas tingkat praindustri^d

Mulai tahun 2030 dan seterusnya, penggunaan energi terbarukan dan armada listrik diperkirakan akan menjadi kontributor utama untuk mencapai net zero pada tahun 2050

From 2030 onwards, the use of renewable energy and electric fleets is forecast to be the main contributors to achieve net zero by 2050

NET ZERO

Achieving net zero emission by 2050 as a contribution towards holding the increase in the global average temperature to well below 2°C and pursuing efforts to limit the temperature increase to 1.5°C above pre-industrial levels^d

^a The copper & gold GHG emission intensity has been revised to a stretch target of 50% from the original 2021 statement of 29% (Scope 1 and Scope 2).
^b Acid emission intensity target of 29% by 2030 remains the same.
^c PLN = Perusahaan Listrik Negara (National Electric Company).

Performance against targets to be reviewed annually and to include further GHG reduction opportunities.

^dArticle 2(a), Paris Agreement, 2015

Energi

Pada tahun 2025, Tambang Emas Tujuh Bukit menggunakan tenaga listrik yang disuplai oleh PT Perusahaan Listrik Negara (PLN), yang bersumber dari Pembangkit Listrik Tenaga Air (PLTA), untuk mendukung kegiatan operasionalnya. Sementara itu, Tambang Tembaga Wetar dan Tambang Nikel Konawe telah mengintegrasikan listrik yang dihasilkan dari panel surya untuk memenuhi kebutuhan energinya. Seluruh area operasi Merdeka kini menggunakan Biodiesel B40, campuran biomasa 40%, sebagai sumber energi utama. [F.5] [F.7] [F.26]

Pada tahun 2025, Merdeka melaksanakan berbagai inisiatif efisiensi energi melalui sejumlah program. Tambang Emas Bukit Tujuh dan Tambang Nikel Konawe dapat menghemat konsumsi listrik masing-masing sebesar 24.288 kWh atau setara dengan 87,44 gigajoule dan 14.711.667 kWh atau setara dengan 52.962 gigajoule dari penggunaan panel surya. Selain itu, efisiensi bahan bakar di Tambang Nikel Konawe juga berhasil menghemat 563.293 liter B40. Penerapan strategi efisiensi energi ini tidak hanya membantu mengurangi biaya operasional, tetapi juga mendukung target keberlanjutan perusahaan dalam menekan jejak karbon dan meningkatkan efisiensi penggunaan sumber daya. [F.7]

Pada tahun 2025, total konsumsi energi Merdeka tercatat sebesar 37.105.763 gigajoule (GJ) sementara intensitas energi yang tercatat adalah 19.583 GJ per juta USD atau naik 24% dari tahun 2024. Total penggunaan energi terbarukan di Merdeka tahun 2025 sebesar 2.822.115 GJ. Faktor konversi energi yang digunakan mengacu pada 2006 IPCC *Guidelines for National Greenhouse Gas Inventories* dan dokumen Inventarisasi Emisi GRK Bidang Energi (Desember 2020) dari Pusat Data dan Teknologi Informasi Energi, Kementerian ESDM. Kenaikan konsumsi dan intensitas energi disebabkan oleh peningkatan aktivitas penyelesaian konstruksi di Tambang Emas Pani serta aktivitas pembukaan lahan dan penambangan di Tambang Nikel Konawe. [302-1][302-3][14.1.2][14.1.4][F.6]

Jumlah konsumsi energi hanya mencakup entitas anak yang dilaporkan di Laporan Keberlanjutan sebagaimana disampaikan di halaman 27. Tidak terdapat konsumsi energi yang digunakan di luar area operasional pertambangan dan pengolahan hasil tambang.

Energy

By 2025, the Tujuh Bukit Gold Mine will use electricity supplied by PT Perusahaan Listrik Negara (PLN), sourced from hydroelectric power plants (PLTA), to support its operational activities. Meanwhile, the Wetar Copper Mine and the Konawe Nickel Mine have integrated electricity generated from solar panels to meet their energy needs. All of Merdeka's operational areas now use B40 biodiesel, a 40% biomass blend, as their primary energy source.

In 2025, Merdeka implemented various energy efficiency initiatives through a number of programs. The Bukit Tujuh Gold Mine and the Konawe Nickel Mine were able to save 24,288 kWh of electricity each, equivalent to 87.44 gigajoules and 14,711,667 kWh, equivalent to 52,962 gigajoules, respectively, through the use of solar panels. Additionally, fuel efficiency at the Konawe Nickel Mine has successfully saved 563,293 liters of B40. The implementation of these energy efficiency strategies not only helps reduce operational costs but also supports the company's sustainability goals in reducing its carbon footprint and improving resource efficiency.

In 2025, Merdeka's total energy consumption was recorded at 37,105,763 gigajoules (GJ), while the recorded energy intensity was 19,583 GJ per million USD or increased 24% from 2024. Total renewable energy use at Merdeka in 2025 was 2,822,115 GJ. The energy conversion factors used refer to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories and the Energy Sector GHG Emissions Inventory (December 2020) document from the Energy Data and Information Technology Center, Ministry of Energy and Mineral Resources. The increase in energy consumption and intensity was driven by the escalation of construction completion activities at Pani Gold Mine as well as land clearing and mining activities at Konawe Nickel Mine.

Total energy consumption includes only the subsidiaries reported in the Sustainability Report, as presented on page 27. There is no energy consumption occurring outside the operational areas of mining and mineral processing.

Total Konsumsi Energi tiap Entitas anak [F.11] [302-

1] [302-3]

Total Energy Consumption by Subsidiary

Tambang Emas Tujuh Bukit Tujuh Bukit Gold Mine

Bahan Bakar Fuel	Satuan Unit	2023*	2024*	2025
Terbarukan Renewable				
Listrik REC REC electricity	GJ	179,118	148,125	164,988
Biosolar Biodiesel	GJ	5	0	87
Panel surya Solar panel	GJ	289,052	350,738	492,733
Tidak Terbarukan Non-Renewable				
Biosolar Biodiesel	GJ	545,389	651,371	739,100
Acetylene	GJ	118	213	208
Total konsumsi Energi Total Energy Consumption	GJ	1,013,682	1,150,448	1,397,117
Total produksi emas Total gold production	Oz	138,666	115,867	103,156
Intensitas energi Energy intensity	GJ/Oz	7.31	9.93	13.54

Tambang Nikel Konawe Konawe Nickel Mine

Bahan Bakar Fuel	Satuan Unit	2023*	2024*	2025
Terbarukan Renewable				
Panel surya Solar panel	GJ	0	0	52,962
Biosolar Biodiesel	GJ	327,317	993,409	1,351,973
Tidak Terbarukan Non-Renewable				
Listrik Electricity	GJ	293	291	400
Biosolar Biodiesel	GJ	701,742	1,844,903	2,111,212
Acetylene	GJ	2	0	0
LPG	GJ	3,618	2,744	5,911
Pertamax	GJ	181	0	67
Total konsumsi Energi Total Energy Consumption	GJ	1,033,153	2,841,347	3,522,524
Total produksi nikel Total nickel production	Million Wet Metric Tonne (MWT)	6.3	15.0	21.7
Intensitas energi Energy intensity	GJ/MWT	0.16	0.19	0.16

Tambang Tembaga Wetar Wetar Copper Mine

Bahan Bakar Fuel	Satuan Unit	2023*	2024	2025
Terbarukan Renewable				
Biosolar Biodiesel	GJ	373,613	306,534	420,065
Tidak Terbarukan Non-Renewable				
Biosolar Biodiesel	GJ	871,763	715,247	630,098
Acetylene	GJ	26	0	0
LPG	GJ	1,615	1	0
Pertalite	GJ	1,247	0	0
Total konsumsi Energi Total Energy Consumption	GJ	1,248,264	1,021,782	1,050,163
Total produksi tembaga Total copper production	Ton Tons	12,706	13,902	10,454
Intensitas energi Energy intensity	GJ/Ton	98.24	73.50	100.46

Tambang Emas Pani Pani Gold Mine

Bahan Bakar Fuel	Satuan Unit	2023	2024	2025
Terbarukan Renewable				
Biosolar Biodiesel	GJ	35,485	83,313	237,288
Tidak Terbarukan Non-Renewable				
Biosolar Biodiesel	GJ	65,900	154,723	355,932
Listrik Electricity	GJ	4,993	9,935	12,036
Total konsumsi Energi Total Energy Consumption	GJ	106,378	247,971	605,256

Pabrik AIM AIM Plant

Bahan Bakar Fuel	Satuan Unit	2023*	2024*	2025
Terbarukan Renewable				
Biosolar Biodiesel	GJ	18,885	21,431	21,850
Tidak Terbarukan Non-Renewable				
Listrik Electricity	GJ	5,439	333,146	723,750
Biosolar Biodiesel	GJ	35,157	40,183	33,977
Acetylene	GJ	883	439	329
Total konsumsi Energi Total energy consumption	GJ	60,363	395,198	779,905

Huaneng Metal Industry (HNMI)

Bahan Bakar Fuel	Satuan Unit	2023	2024	2025
Terbarukan Renewable				
Biosolar Biodiesel	GJ	11,301	11,524	5,734
Tidak Terbarukan Non-Renewable				
Listrik Electricity	GJ	245,706	252,653	129,791
Biosolar Biodiesel	GJ	20,988	21,402	8,602
Total konsumsi Energi Total Energy Consumption	GJ	277,995	285,579	144,127
Total produksi Nikel Matte Total Nickel Production	Ton Ni	30,333	50,315	19,998
Intensitas energi Energy intensity	GJ/Ton Ni	9.16	5.68	7.21

RKEF Smelter (BSID, CSID, ZHN)

Bahan Bakar Fuel	Satuan Unit	2023	2024	2025
Terbarukan Renewable				
Biosolar Biodiesel	GJ	60,606	74,654	74,433
Tidak Terbarukan Non-Renewable				
Listrik Electricity	GJ	8,872,121	11,652,994	10,987,076
Biosolar Biodiesel	GJ	112,554	138,643	111,650
Batu Bara Coal	GJ	16,854,114	17,620,791	18,433,511
Total konsumsi Energi Total energy consumption	GJ	25,899,395	29,487,082	29,606,671
Total produksi Nikel dalam NPI Total Nickel Production in NPI	Ton Ni	65,117	82,161	73,871
Intensitas energi Energy intensity	GJ/Ton Ni	397.74	358.89	400.79

Keterangan:
 *Diungkapkan kembali karena perbaikan metodologi perhitungan/
 Restated due to improvement in calculation methodology.
 Faktor konversi menggunakan | Conversion factor used:
 - 2006 IPCC Guidelines for National Greenhouse Gas Inventories;
 - Pusat Data dan Teknologi Informasi Energi dan Sumber Daya Mineral,
 Kementerian Energi dan Sumber Daya Mineral "Inventarisasi Emisi
 GRK Bidang Energi", Desember 2020.
 - Biodiesel used: B30, B35, B40
 1 kWh = 0.0036 GJ (Gigajoule)
 1 Liter Pertamina = 0.02965 GJ (Gigajoule)
 1 Liter Pertalite = 0.0332367 GJ (Gigajoule)
 1 Liter Biodiesel B-30 = 0.037 GJ (Gigajoule)
 1 Liter Biodiesel B-35 = 0.037 GJ (Gigajoule)
 1 Liter Biodiesel B-40 = 0.0368 GJ (Gigajoule)

Emisi

Pemantauan emisi merupakan langkah penting bagi Merdeka dalam mengidentifikasi dan mengurangi dampak lingkungan, mematuhi regulasi emisi yang berlaku, serta meningkatkan reputasi perusahaan di bidang praktik pertambangan berkelanjutan. Merdeka terus berkomitmen untuk melakukan perbaikan berkelanjutan dalam pengembangan sistem perhitungan dan pelaporan emisi GRK.

Sejak tahun 2023, Merdeka menggunakan platform penghitungan emisi TruCount untuk mengukur, memantau, mengelola, dan melaporkan emisi GRK. Platform TruCount dikembangkan berdasarkan dua standar internasional yang diakui secara global, yaitu Greenhouse Gas Protocol dan ISO 14064-1:2018, yang menjamin akurasi penghitungan dan kepatuhan terhadap standar internasional. Selain itu, metode perhitungan emisi juga mengacu pada Pedoman Inventarisasi Emisi Gas Rumah Kaca yang diterbitkan oleh Intergovernmental Panel on Climate Change dan Pedoman Penyelenggaraan Inventarisasi Gas Rumah Kaca Nasional, Buku II Volume 1, yang diterbitkan oleh Kementerian Lingkungan Hidup pada tahun 2012.

Merdeka menghitung emisi Gas Rumah Kaca (GRK) Cakupan 1 dan Cakupan 2 menggunakan pendekatan kontrol finansial, dengan batasan entitas anak sebagaimana dijelaskan pada halaman 27. Emisi Cakupan 1 berasal dari pembakaran bahan bakar untuk kendaraan operasional dan peralatan tambang di seluruh entitas anak, pembakaran batu bara untuk pembangkitan panas serta sebagai reduktan di smelter RKEF, dan penggunaan genset sebagai pembangkit listrik.

Emisi Cakupan 2 dihitung dari konsumsi energi listrik yang disuplai oleh PLN. Untuk entitas anak yang beroperasi di Kawasan Industri Indonesia Morowali Industrial Park (IMIP), energi listrik dipasok oleh Pembangkit Listrik Tenaga Uap (PLTU) yang dikelola oleh IMIP.

Sementara itu, untuk emisi GRK Cakupan 3, perusahaan telah melakukan pelatihan internal guna membangun pemahaman dasar yang kuat mengenai perhitungan dan pengelolaan emisi Cakupan 3 sesuai dengan GHG Protocol Scope 3 Standard serta persyaratan ISO 14064-1:2018 pada Oktober 2025. [305-3][14.1.7]

Pada tahun 2025, total emisi GRK Merdeka mengalami peningkatan, seiring dengan peningkatan aktivitas konstruksi di Tambang Emas Pani serta aktivitas bukaan lahan dan penambangan di Tambang Nikel Konawe. Total emisi gas rumah kaca Merdeka mencapai 5.446.175 ton karbon dioksida ekuivalen (tCO₂e), dengan 2.472.434 tCO₂e berasal dari cakupan 1 dan 2.973.742 tCO₂e berasal dari cakupan 2. Intensitas emisi tercatat sebesar 2.874 tCO₂e/ juta USD atau naik 19% dari tahun 2024. [305-4][14.1.8]

Emissions

Emissions monitoring is a critical step for Merdeka in identifying and reducing environmental impacts, complying with applicable emissions regulations, and enhancing the company's reputation in sustainable mining practices. Merdeka remains committed to continuous improvement in the development of its GHG emissions calculation and reporting systems.

Since 2023, Merdeka has been using the TruCount emissions calculation platform to measure, monitor, manage, and report GHG emissions. The TruCount platform is developed based on two globally recognized international standards, namely the Greenhouse Gas Protocol and ISO 14064-1:2018, which ensure calculation accuracy and compliance with international standards. Additionally, the emissions calculation method also refers to the Greenhouse Gas Inventory Guidelines published by the Intergovernmental Panel on Climate Change and the Guidelines for the Implementation of the National Greenhouse Gas Inventory, Book II Volume 1, published by the Ministry of Environment in 2012.

Merdeka calculates Scope 1 and Scope 2 Greenhouse Gas (GHG) emissions using the financial control approach, with the scope of subsidiaries defined as described on page 27. Scope 1 emissions stem from the combustion of fuel for operational vehicles and mining equipment across all subsidiaries, the combustion of coal for heat generation and as a reducing agent in the RKEF smelter, and the use of generators for electricity generation.

Scope 2 emissions are calculated based on electricity consumption supplied by PLN. For subsidiaries operating within the Indonesia Morowali Industrial Park (IMIP) Industrial Zone, electricity is supplied by a Steam Power Plant (PLTU) managed by IMIP.

Meanwhile, for Scope 3 GHG emissions, the company has conducted internal training to build a strong foundational understanding of Scope 3 emissions calculation and management in accordance with the GHG Protocol Scope 3 Standard and the requirements of ISO 14064-1:2018 in October 2025.

In 2025, Merdeka's total GHG emissions increased, in line with intensified construction activities at Pani Gold Mine and land clearing and mining activities at Konawe Nickel Mine. Merdeka's total greenhouse gas emissions reached 5,446,175 tons of carbon dioxide equivalent (tCO₂e), with 2,472,434 tCO₂e originating from Scope 1 and 2,973,742 tCO₂e from Scope 2. Emissions intensity was recorded at 2,874 tCO₂e/ million USD or increased 19% from 2024.

Total Emisi GRK dan Intensitas Emisi berdasarkan Entitas Anak [F.11] [305-1][305-2][305-4] [14.1.5][14.1.6] **Total GHG Emissions and Emission Intensity by Subsidiary**

Tambang Emas Tujuh Bukit
Tujuh Bukit Gold Mine

Emission Source	CO ₂	CH ₄	N ₂ O	HFCs	Total Emission (tCO ₂ e)		
					2025	2024*	2023*
Cakupan 1 Scope 1							
Konsumsi Bahan Bakar (Bergerak) Fuel Consumption (Mobile)	47,688	110	765	-	48,562	46,932	38,044
Konsumsi Bahan Bakar (Stasioner) Fuel Consumption (Stationary)	6,230	12	23	-	6,265	4,403	4,603
Pembukaan Lahan Land Clearing	37,656	-	-	-	37,656	74,043	31,523
Emisi Fugitive Fugitive Emissions	-	7	-	1,015	1,023	1,295	1,695
Peledak Explosive	138	-	-	-	138	548	522
Total Scope 1	91,711	129	787	1,015	93,644	127,221	76,387
Cakupan 2 Scope 2							
Konsumsi Listrik (REC)*** Electricity Consumption (REC)	0	-	-	-	0	1,628	1,968
Total Scope 2	0	0	0	0	0	1,628	1,968
Total GHG Scope 1 and 2	Ton CO2 (e)				93,644	128,849	78,355
Produksi Emas Gold Production	Oz				103,156	115,867	138,666
Intensitas Emisi Emissions Intensity	Ton CO2 (e)/Oz				0.91	1.11	0.57
Biogenic Emission							
Konsumsi Bahan Bakar (Bergerak) Fuel Consumption (Mobile)	29,549	-	-	-	29,549	10,514	18,026
Konsumsi Bahan Bakar (Stasioner) Fuel Consumption (Stationary)	3,851	-	-	-	3,851	957	2,438
Total GHG Biogenic	Ton CO2 (e)				33,400	11,471	20,464

Tambang Nikel Konawe
Konawe Nickel Mine

Emission Source	CO ₂	CH ₄	N ₂ O	HFCs	Total Emission (tCO ₂ e)		
					2025	2024*	2023*
Cakupan 1 Scope 1							
Konsumsi Bahan Bakar (Bergerak) Fuel Consumption (Mobile)	149,140	312	1,103	-	150,555	-	142
Konsumsi Bahan Bakar (Stasioner) Fuel Consumption (Stationary)	7,531	17	134	-	7,683	131,572	49,922
Pembukaan Lahan Land Clearing	311,333	-	-	-	311,333	137,601	120,987

Emission Source	CO ₂	CH ₄	N ₂ O	HFCs	Total Emission (tCO ₂ e)		
					2025	2024*	2023*
Emisi Fugitive Fugitive Emissions	-	624	-	-	624	705	426
Total Scope 1	468,004	953	1,237	-	470,195	269,879	171,477
Cakupan 2 Scope 2							
Konsumsi Listrik Electricity Consumption	113	-	-	-	113	82	83
Total Scope 2	113	-	-	-	113	82	83
Total GHG Scope 1 and 2	Ton CO2 (e)				470,308	269,961	171,560
Produksi Nikel Ore Nickel Ore Production	Million Wet Metric Tonne (WMT)				22	15	6.3
Intensitas Emisi Emissions Intensity	Ton CO2 (e)/WMT				0.022	0.018	0.027
Biogenic Emission							
Konsumsi Bahan Bakar (Bergerak) Fuel Consumption (Mobile)	91,821	-	-	-	91,821	-	57
Konsumsi Bahan Bakar (Stasioner) Fuel Consumption (Stationary)	4,232	-	-	-	4,232	38,738	23,117
Total GHG Biogenic	Ton CO2 (e)				96,052	38,738	23,174

**Tambang Tembaga Wetar
Wetar Copper Mine**

Emission Source	CO ₂	CH ₄	N ₂ O	HFCs	Total Emission (tCO ₂ e)		
					2025	2024	2023
Cakupan 1 Scope 1							
Konsumsi Bahan Bakar (Bergerak) Fuel Consumption (Mobile)	10,106	21	38	-	10,165	22,394	34,254
Konsumsi Bahan Bakar (Stasioner) Fuel Consumption (Stationary)	35,847	95	872	-	36,814	28,421	27,579
Pembukaan Lahan Land Clearing	3,046	-	-	-	3,046	6,355	18,559
Emisi Fugitive Fugitive Emissions	-	30	-	99	129	5	-**
Emisi Proses Proces Emissions	8,762	-	-	-	8,762	44,026	31,500
Total Scope 1	57,761	146	910	99	58,915	101,201	111,892

Emission Source	CO ₂	CH ₄	N ₂ O	HFCs	Total Emission (tCO ₂ e)		
					2025	2024	2023
Cakupan 2 Scope 2							
Konsumsi Listrik Electricity Consumption	0	-	-	-	0	0	0
Total Scope 2	0	-	-	-	0	0	0
Total GHG Scope 1 and 2	Ton CO2 (e)				58,915	101,201	111,892
Produksi Tembaga Copper Production	Ton				10,454	13,902	12,706.0
Intensitas Emisi Emissions Intensity	Ton CO2 (e)/Ton				5.64	7.28	8.81
Biogenic Emission							
Konsumsi Bahan Bakar (Bergerak) Fuel Consumption (Mobile)	6,739	-	-	-	6,739	9,603	14,642
Konsumsi Bahan Bakar (Stasioner) Fuel Consumption (Stationary)	23,904	-	-	-	23,904	12,199	11,781
Total GHG Biogenic	Ton CO2 (e)				30,643	21,802	26,423

**Tambang Emas Pani
Pani Gold Mine**

Emission Source	CO ₂	CH ₄	N ₂ O	HFCs	Total Emission (tCO ₂ e)		
					2025	2024*	2023*
Cakupan 1 Scope 1							
Konsumsi Bahan Bakar (Bergerak) Fuel Consumption (Mobile)	25,203	58,038	404	-	25,666	10,197	3,332
Konsumsi Bahan Bakar (Stasioner) Fuel Consumption (Stationary)	755	2	3	-	759	770	1,333
Land Clearing	54,858	-	-	-	54,858	91,646	18,039
Fugitive Emissions	-	241	-	-	241	229	320
Total Scope 1	80.817	300	407	-	81,524	102,842	23,025
Cakupan 2 Scope 2							
Konsumsi Listrik Electricity Consumption	2,608	-	-	-	2,608	1,910	1,218
Total Scope 2	2,608	-	-	-	2,608	1,910	1,218
Total GHG Scope 1 and 2	Ton CO2 (e)				84,131	105,403	24,243
Biogenic Emission							
Konsumsi Bahan Bakar (Bergerak) Fuel Consumption (Mobile)	15,617	-	-	-	15,617	821	1,794
Konsumsi Bahan Bakar (Stasioner) Fuel Consumption (Stationary)	468	-	-	-	468	348	718
Total GHG Biogenic	Ton CO2 (e)				16,085	1,170	2,512

**Pabrik AIM
AIM Plant**

Emission Source	CO ₂	CH ₄	N ₂ O	HFCs	Total Emission (tCO ₂ e)		
					2025	2024	2023
Cakupan 1 Scope 1							
Konsumsi Bahan Bakar (Bergerak) Fuel Consumption (Mobile)	529	1	2	-	532	729	745
Konsumsi Bahan Bakar (Stasioner) Fuel Consumption (Stationary)	1,963	5	38	-	2,006	2,158	1,806
Emisi Fugitive Fugitive Emissions	0.029	22	-	4,681	4,704	1,153	63
Total Scope 1	2,492	28	40	4,681	7,241	4,040	2,614
Cakupan 2 Scope 2							
Konsumsi Listrik Electricity Consumption	182,948	-	-	-	182,948	84,212	1,374
Total Scope 2	182,948	0	0	0	182,948	84,212	1,374
Total GHG Scope 1 and 2	Ton CO₂ (e)				190,189	88,252	3,988
Biogenic Emission							
Konsumsi Bahan Bakar (Bergerak) Fuel Consumption (Mobile)	323	-	-	-	323	262	397
Konsumsi Bahan Bakar (Stasioner) Fuel Consumption (Stationary)	1,163	-	-	-	1,163	524	939
Total GHG Biogenic	Ton CO₂ (e)				1,486	786	1,336

Huaneng Metal Industry (HNMI)

Emission Source	CO ₂	CH ₄	N ₂ O	HFCs	Total Emission (tCO ₂ e)		
					2025	2024	2023
Cakupan 1 Scope 1							
Konsumsi Bahan Bakar Fuel Consumption	627	2	15	-	644	2,414	2,368
Total Scope 1	627	2	15	-	644	2,414	2,368
Cakupan 2 Scope 2							
Konsumsi Listrik Electricity Consumption	32,448	17	86	-	32,551	63,364	54,455
Total Scope 2	32,448	17	86	0	32,551	63,364	54,455
Total GHG Scope 1 and 2	Ton CO₂ (e)				33,195	65,778	56,823
Produksi Nikel dalam Nikel Matte in Nickel Matte	Ton Ni				19,998	50,315	30,333
Intensitas Emisi Emissions Intensity	Ton CO₂ (e)/Ton Ni				1.66	1.31	1.87
Biogenic Emission							
Konsumsi Bahan Bakar Fuel Consumption	481	-	-	-	481	-**	-**
Total GHG Biogenic	Ton CO₂ (e)				481	-**	-**

RKEF Smelter (BSID, CSID, ZHN)

Emission Source	CO ₂	CH ₄	N ₂ O	HFCs	Total Emission (tCO ₂ e)		
					2025	2024	2023
Cakupan 1 Scope 1							
Konsumsi Bahan Bakar Fuel Consumption	1,751,953	571	7,747	-	1,760,271	1,747,882	1,736,465
Total Scope 1	1,751,953	571	7,747	-	1,760,271	1,747,882	1,736,465
Cakupan 2 Scope 2							
Konsumsi Listrik Electricity Consumption	2,746,769	1,446	7,307	0	2,755,522	2,922,532	1,966,327
Total Scope 2	2,746,769	1,446	7,307	0	2,755,522	2,922,532	1,966,327
Total GHG Scope 1 and 2	Ton CO₂ (e)				4,515,793	4,670,414	3,702,792
Produksi nikel dalam Nikel Pig Iron (NPI) Nickel production in Nickel Pig Iron (NPI)	Ton Ni				73,871	82,161	65,117.0
Intensitas Emisi Emissions Intensity	Ton CO₂ (e)/Ton Ni				61.13	56.84	56.86
Biogenic Emission							
Konsumsi Bahan Bakar Fuel Consumption	5,428	-	-	-	5,428	-**	-**
Total GHG Biogenic	Ton CO₂ (e)				5,428	-**	-**

*Diungkapkan kembali karena perbaikan metodologi perhitungan/Restated due to improvement in calculation methodology.
 **Data belum tersedia / data not available
 ***Perhitungan GRK Cakupan 2 menggunakan market approach hanya dilakukan di Tambang Emas Tujuh Bukit karena seluruh konsumsi listrik sudah dicakup oleh PLTP Kamojang dan PLTA Cirata/The calculation of GHG Scope 2 using the market-based approach is only applied at Tujuh Bukit Gold Mine, as all electricity consumption is supplied by the Cirata Hydropower Plant.
 Faktor Emisi Pertalite = 0,00215 Ton CO₂ (e)/litre. Source : EF BBM Pertamina
 Faktor Emisi Pertamina = 0,00231 Ton CO₂ (e)/litre. Source : EF BBM Pertamina
 Faktor Emisi B-30 = 0,0018 Ton CO₂ (e)/litre. Source : B-30
 Faktor Emisi B-35 (Non-biogenic per liter) = 0,0017 Ton CO₂ (e)/litre. Source: B-35
 Faktor Emisi B-40 (Non-biogenic per liter) = 0,0016 Ton CO₂ (e)/litre.
 Faktor Emisi Listrik PLTP (REC) = 0,00003956 Ton CO₂ (e)/MWh. Source: EF PLTP Kamojang
 Faktor Emisi Listrik PLTP (REC) = 0 Ton CO₂ (e)/MWh. Source: GHG Protocol Scope 2 Guidelines
 Faktor Emisi Power Plant for AIM Project = 0,91 Ton CO₂ (e)/MWh. Source: EF IMIP Project
 Faktor Emisi Listrik Grid Jamali = 0,87 Ton CO₂ (e)/MWh (OM for Ex-Post). Source: EF Ketenagalistrikan 2021
 Faktor Emisi Listrik Grid Sulutgo = 0,78 Ton CO₂ (e)/MWh (OM for Ex-Post). Source: EF Ketenagalistrikan 2021
 Faktor Emisi Batubara Bituminous = 94,715 kg/TJ. Source: Puslitbang Tekmira KESDM, 2016
 Faktor Emisi Batubara Sub-bituminous = 100,575 kg/TJ. Source: Puslitbang Tekmira KESDM, 2016
 Faktor Emisi Batubara Lignite = 106,476 kg/TJ. Source: Puslitbang Tekmira KESDM, 2016
 Faktor Emisi Batubara Blue coke = 100,200 kg/TJ. Source: Juhrich K., 2016

Produk Ramah Lingkungan [F.26][F.28][2-6][MM11]

Industri logam dan pertambangan memainkan peran penting dalam mencapai target emisi nol-bersih global. Salah satu inisiatif utama adalah mendukung dekarbonisasi sektor transportasi melalui penggunaan *Electric Vehicles* (EVs) yang menggunakan energi terbarukan.

Nikel, sebagai salah satu logam hasil pertambangan, menjadi komponen penting dalam produksi baterai untuk EVs. Akuisisi aset pertambangan dan fasilitas pengolahan nikel yang dilakukan Merdeka mencerminkan komitmen perusahaan untuk menjadi pemain global yang terintegrasi secara vertikal dalam rantai pasokan mineral strategis dan baterai kendaraan listrik.

Environmentally Friendly Products

The metals and mining industry plays a crucial role in achieving global net-zero emissions targets. One of the key initiatives is supporting the decarbonization of the transportation sector through the use of *Electric Vehicles* (EVs) powered by renewable energy.

Nickel, as a key mined metal, is a critical component in the production of batteries for EVs. Merdeka's acquisition of nickel mining assets and processing facilities reflects the company's commitment to becoming a vertically integrated global player in the strategic mineral and electric vehicle battery supply chain.

Merdeka memiliki posisi strategis untuk menangkap nilai tambah dalam rantai pasokan nikel, mulai dari penambangan hingga pengolahan logam untuk kebutuhan baterai EVs. Diagram berikut menggambarkan peran Merdeka dalam rantai nilai nikel:

Tambang Nikel Konawe

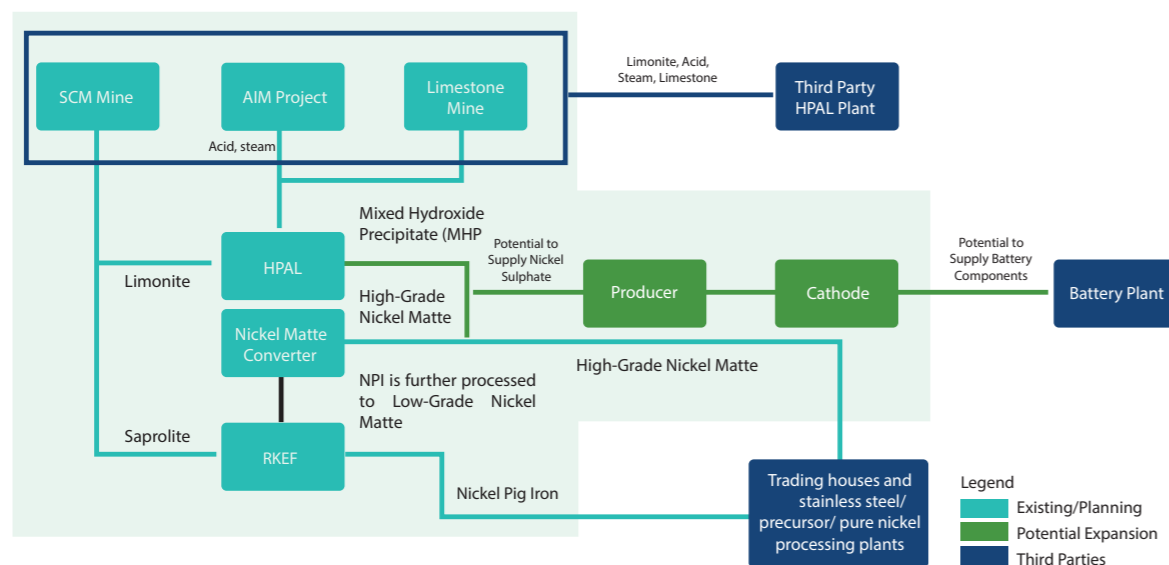
Melalui anak perusahaannya, Merdeka Battery Materials (MBM), Merdeka mengelola Tambang Nikel Konawe, salah satu sumber daya nikel terbesar di dunia. Tambang ini memiliki kandungan sekitar 13,8 juta ton nikel (kadar Ni 1,22%) dan 1,0 juta ton kobalt (kadar Co 0,08%). Tambang terbuka ini mencakup konsesi seluas 21.100 hektar, dengan karakteristik yang mendukung operasional berbiaya rendah. Sumber daya yang tersedia didominasi oleh limonit nikel (77%) dan saprolit nikel (23%). Bijih limonit digunakan sebagai bahan baku untuk memproduksi *Mixed Hydroxide Precipitate* (MHP) melalui teknologi *High-Pressure Acid Leach* (HPAL), yang kemudian diolah menjadi nikel sulfat, komponen utama dalam baterai kendaraan listrik.

Merdeka is strategically positioned to capture value-added opportunities across the nickel supply chain, from mining to metal processing for EV battery needs.

The following diagram illustrates Merdeka's role in the nickel value chain:

Konawe Nickel Mine

Through its subsidiary, Merdeka Battery Materials (MBM), Merdeka manages the Konawe Nickel Mine, one of the world's largest nickel resources. The mine contains approximately 13.8 million tons of nickel (Ni grade 1.22%) and 1.0 million tons of cobalt (Co grade 0.08%). This open-pit mine covers a concession area of 21,100 hectares, with characteristics that support low-cost operations. The available resources are dominated by nickel limonite (77%) and nickel saprolite (23%). Limonite ore is used as feedstock to produce Mixed Hydroxide Precipitate (MHP) via High-Pressure Acid Leach (HPAL) technology, which is then processed into nickel sulfate, a key component in electric vehicle batteries.



Smelter Rotary Kiln-Electric Furnace (RKEF)

MBM mengoperasikan tiga smelter RKEF yaitu PT Cahaya Smelter Indonesia (CSID), PT Bukit Smelter Indonesia (BSID) dan PT Zhao Hui Nickel (ZHN) yang telah beroperasi memproduksi Nickel Pig Iron (NPI). CSID dan BSID masing-masing memiliki kapasitas produksi 19.000 ton nikel dalam bentuk NPI per tahun. ZHN memiliki kapasitas terpasang sebesar 50.000 ton nikel per tahun.

Fasilitas Konversi Nikel Matte Kadar Tinggi

PT Huaneng Metal Industry (HNMI) memproses nikel matte kadar rendah dengan teknologi pengurangan kandungan besi untuk menghasilkan nikel matte kadar tinggi yang mengandung lebih dari 70% nikel. Produk ini merupakan bahan antara yang digunakan untuk memproduksi nikel sulfat, komponen strategis dalam rantai pasokan baterai.

Rotary Kiln-Electric Furnace (RKEF) Smelters

MBM operates three RKEF smelters: PT Cahaya Smelter Indonesia (CSID), PT Bukit Smelter Indonesia (BSID), and PT Zhao Hui Nickel (ZHN), which are currently in operation producing Nickel Pig Iron (NPI). CSID and BSID each have a production capacity of 19,000 tons of nickel in the form of NPI per year. ZHN has an installed capacity of 50,000 tons of nickel per year.

High-Grade Nickel Matte Conversion Facilities

PT Huaneng Metal Industry (HNMI) processes low-grade nickel matte using iron-reduction technology to produce high-grade nickel matte containing over 70% nickel. This product serves as an intermediate material used to produce nickel sulfate, a strategic component in the battery supply chain.

Proyek Acid Iron Metal (AIM)

Rantai pasokan kendaraan listrik (EV) Merdeka didukung oleh Proyek *Acid Iron Metal* (AIM), sebuah pabrik pengolahan modern yang mengolah bahan baku pirit kadar tinggi dari Tambang Tembaga Wetar. Pabrik ini menghasilkan asam dan uap untuk mendukung operasional pabrik HPAL, serta memproduksi logam lainnya seperti tembaga, emas, dan besi. Proyek AIM dimiliki oleh PT Merdeka Tsingshan Indonesia, sebuah perusahaan patungan di mana MBM memiliki 80% saham, sementara 20% saham dimiliki oleh Tsingshan.

Reklamasi dan Keanekaragaman Hayati

Reklamasi [3-3][14.8.1][14.4.2] [14.4.3]

Merdeka adalah perusahaan pertambangan dan pengolahan mineral yang berkomitmen untuk mematuhi seluruh peraturan pemerintah yang berlaku, termasuk Peraturan Menteri Energi dan Sumber Daya Mineral Republik Indonesia Nomor 7 Tahun 2014 tentang Pelaksanaan Reklamasi dan Pascatambang pada kegiatan usaha pertambangan mineral dan batubara. Sebagai bukti kepatuhan, seluruh wilayah operasional Merdeka telah memiliki Izin Usaha Pertambangan (IUP) yang diterbitkan oleh pemerintah Indonesia. Selain itu, Merdeka menerbitkan dan menerapkan [Kebijakan Pengelolaan Keanekaragaman Hayati](#) yang selaras dengan Standar Kinerja 6 IFC dan Prinsip 7 ICMM, yang menegaskan komitmen perusahaan untuk melindungi dan melestarikan keanekaragaman hayati, menjaga manfaat jasa ekosistem, serta mendorong pengelolaan sumber daya hayati secara berkelanjutan. Kebijakan Pengelolaan Keanekaragaman Hayati tersebut berlaku di seluruh wilayah operasional Merdeka dan mencakup seluruh rekan bisnis, termasuk kontraktor dan pemasok. [101-1][14.4.2]

Untuk mengatasi dampak keanekaragaman hayati dari kegiatan operasional kami, seluruh (100%) operasi pertambangan kami telah menyusun Analisis Mengenai Dampak Lingkungan (AMDAL) yang mencakup langkah-langkah reklamasi lahan dan pengelolaan keanekaragaman hayati. Penyusunan langkah-langkah tersebut melibatkan keterlibatan pihak ketiga, termasuk tenaga ahli dan masyarakat setempat, untuk memastikan perencanaan lingkungan yang komprehensif dan inklusif.

Setiap entitas anak Merdeka yaitu Tambang Emas Tujuh Bukit, Tambang Tembaga Wetar, dan Tambang Nikel Konawe telah menyusun Rencana Penutupan Tambang dengan melibatkan masyarakat melalui konsultasi publik dan Rencana Reklamasi yang mendapat persetujuan dari pemerintah. Rencana ini tidak hanya berfungsi sebagai dokumen formal, tetapi juga menjadi panduan utama untuk memastikan bahwa operasi tambang dilaksanakan dengan prinsip keberlanjutan lingkungan. Perkiraan umur tambang pada Tambang Emas Tujuh Bukit, Tambang Emas Pani, Tambang Nikel Konawe, dan Tambang Tembaga Wetar mengacu pada Surat Keputusan Izin Usaha Pertambangan (SK IUP) yang diterbitkan oleh pemerintah. [14.8.4][14.8.7]

Acid Iron Metal (AIM) Project

Merdeka's electric vehicle (EV) supply chain is supported by the Acid Iron Metal (AIM) Project, a modern processing plant that processes high-grade pyrite feedstock from the Wetar Copper Mine. This plant produces acid and steam to support the operations of the HPAL plant, as well as producing other metals such as copper, gold, and iron. The AIM Project is owned by PT Merdeka Tsingshan Indonesia, a joint venture in which MBM holds an 80% stake, while Tsingshan holds the remaining 20%.

Reclamation and Biodiversity

Reclamation

Merdeka is a mining and mineral processing company committed to complying with all applicable government regulations, including Regulation of the Minister of Energy and Mineral Resources of the Republic of Indonesia No. 7 of 2014 on the Implementation of Reclamation and Post-Mining Activities in mineral and coal mining operations. As evidence of compliance, all of Merdeka's operational areas hold Mining Business Permits (IUP) issued by the Indonesian government. Additionally, Merdeka has established and implemented a [Biodiversity Management Policy](#) aligned with IFC Performance Standard 6 and ICMM Principle 7, which reaffirms the company's commitment to protecting and conserving biodiversity, maintaining ecosystem services, and promoting the sustainable management of biological resources. The Biodiversity Management Policy applies across all of Merdeka's operational areas and to its business partners, including contractors and suppliers.

To address the biodiversity impacts of our operations, all (100%) of our mining operations have developed Environmental Impact Assessments that incorporate land reclamation and biodiversity management measures. The formulation of these measures involves third-party engagement, including technical experts and local communities, to ensure comprehensive and inclusive environmental planning.

Each Merdeka subsidiary, Tujuh Bukit Gold Mine, Wetar Copper Mine, and Konawe Nickel Mine, has developed a Mine Closure Plan involving community participation through public consultations, as well as a Reclamation Plan approved by the government. These plans serve not only as formal documents but also as key guidelines to ensure that mining operations are conducted in accordance with environmental sustainability principles. The estimated life of mine for Tujuh Bukit Gold Mine, Pani Gold Mine, Konawe Nickel Mine, and Wetar Copper Mine refers to the Mining Business License Decree (IUP) issued by the government.

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Selain itu, Merdeka secara berkala menyusun laporan pelaksanaan reklamasi melalui Rencana Reklamasi sebagai bagian dari tanggung jawab perusahaan terhadap lingkungan dan masyarakat. Sebagai pemegang Izin Usaha Pertambangan (IUP), Merdeka memastikan bahwa sebelum memulai proses eksplorasi dan produksi, perusahaan telah menempatkan jaminan reklamasi sesuai dengan ketentuan Peraturan Pemerintah Republik Indonesia Nomor 78 Tahun 2010 tentang Reklamasi dan Pascatambang, yang mengharuskan pemegang IUP menyediakan dana sebagai jaminan untuk pelaksanaan reklamasi. [14.8.4][14.8.5][14.8.8]

Additionally, Merdeka regularly prepares reports on reclamation implementation as part of the company's responsibility toward the environment and the community. As a holder of a Mining Business License (IUP), Merdeka ensures that prior to commencing exploration and production processes, the company has established a reclamation guarantee in accordance with the provisions of Government Regulation of the Republic of Indonesia No. 78 of 2010 on Reclamation and Post-Mining Activities, which requires IUP holders to provide funds as a guarantee for the implementation of reclamation.

Informasi terkait bukaan lahan dan reklamasi selama tahun 2025 dapat dilihat di tabel berikut: [14.8.6]

Details of land clearing and reclamation throughout 2025 can be found, as follows:

Kegiatan Activity	Satuan Unit	2023	2024	2025
Pembukaan lahan Land clearing	Ha	370.75	493.74	717.89
Akumulasi pembukaan Cumulative land clearing	Ha	-	2,322.89	2,941.29
Lahan yang direklamasi Reclaimed land	Ha	16.17	26.77	49.60
Akumulasi lahan yang direklamasi Cumulative reclaimed land	Ha	-	100.95	143.56
Penanaman bibit pohon* Tree seedling planting *	Pohon	9,873	26,342	25,405

Keanekaragaman Hayati [3-3][14.4.1][F.9]

Merdeka menyadari bahwa aktivitas pertambangan memiliki potensi dampak negatif terhadap lingkungan, sehingga reklamasi menjadi langkah penting yang harus dilakukan secara menyeluruh. Aktivitas pertambangan dapat menyebabkan kerusakan habitat alami yang mengancam keanekaragaman hayati, termasuk hilangnya spesies flora dan fauna yang mungkin bersifat endemik di wilayah operasional. Selain itu, pembukaan lahan tambang berpotensi memicu deforestasi yang berdampak pada peningkatan emisi karbon dan percepatan perubahan iklim global.

Biodiversity

Merdeka recognizes that mining activities have the potential for negative environmental impacts, making reclamation a critical step that must be carried out comprehensively. Mining activities can cause damage to natural habitats that threaten biodiversity, including the loss of flora and fauna species that may be endemic to the operational area. Additionally, the clearing of mining land has the potential to trigger deforestation, which contributes to increased carbon emissions and accelerates global climate change.

Tanah di area tambang juga rentan terhadap erosi akibat hilangnya vegetasi, yang dapat mengakibatkan penurunan kualitas tanah dan mengganggu keseimbangan ekosistem. Risiko pencemaran lingkungan akibat limbah tambang, seperti logam berat dan bahan kimia, menjadi perhatian serius karena dapat memengaruhi kualitas air dan tanah di sekitar area tambang. Selain itu, perubahan hidrologi akibat aktivitas pertambangan dapat meningkatkan risiko banjir atau kekeringan di wilayah sekitar, yang berdampak pada ekosistem dan kesejahteraan masyarakat. [101-4][14.4.4]

Soil in mining areas is also vulnerable to erosion due to the loss of vegetation, which can lead to a decline in soil quality and disrupt the balance of the ecosystem. The risk of environmental pollution from mining waste, such as heavy metals and chemicals, is a serious concern as it can affect water and soil quality around the mining area. Furthermore, changes in hydrology resulting from mining activities can increase the risk of flooding or drought in surrounding areas, impacting ecosystems and community well-being.

Pengelolaan keanekaragaman hayati di Merdeka meliputi penilaian komprehensif terhadap keanekaragaman hayati, termasuk identifikasi spesies dilindungi dan habitat kritis. Perusahaan berkomitmen untuk melindungi dan melestarikan keanekaragaman hayati, menjaga fungsi ekosistem, serta mendorong pengelolaan sumber daya alam secara berkelanjutan.

Biodiversity management at Merdeka involves a comprehensive assessment of biodiversity, including the identification of protected species and critical habitats. The company is committed to protecting and conserving biodiversity, maintaining ecosystem functions, and promoting the sustainable management of natural resources.

Dalam merancang dan melaksanakan rencana pengelolaan keanekaragaman hayati, Merdeka secara proaktif melakukan dialog dengan masyarakat lokal, ahli keanekaragaman hayati, dan pihak eksternal terkait, terutama di wilayah yang menjadi habitat alami. Perusahaan juga menerapkan hierarki mitigasi, termasuk langkah-langkah antisipatif dan penghindaran dampak terhadap lingkungan. Jika penghindaran tidak memungkinkan, Merdeka berupaya meminimalkan dampak dan melakukan kompensasi atau pemulihan atas dampak residu sepanjang seluruh tahap operasional. [101-2][14.4.3]

In designing and implementing biodiversity management plans, Merdeka proactively engages in dialogue with local communities, biodiversity experts, and relevant external parties, particularly in areas that serve as natural habitats. The company also applies a mitigation hierarchy, including anticipatory measures and steps to avoid environmental impacts. If avoidance is not possible, Merdeka strives to minimize impacts and implement compensation or restoration for residual impacts throughout all operational stages.

Komite Keberlanjutan Merdeka bertanggung jawab dalam merumuskan strategi serta mengawasi kinerja pelaksanaan Kebijakan Pengelolaan Keanekaragaman Hayati. Komite ini secara berkala menyampaikan laporan terkait implementasi Kebijakan Pengelolaan Keanekaragaman Hayati kepada Direksi. Kepala Teknik Tambang (KTT) atau *General Manager* Operasi bertanggung jawab untuk mengomunikasikan serta memantau pelaksanaan Kebijakan Pengelolaan Keanekaragaman Hayati Merdeka.

Merdeka's Sustainability Committee is responsible for formulating strategies and overseeing the implementation of the Biodiversity Management Policy. This committee regularly submits reports on the implementation of the Biodiversity Management Policy to the Board of Directors. The Head of Technical Mining (KTT) or General Manager of Operations is responsible for communicating and monitoring the implementation of Merdeka's Biodiversity Management Policy.

Pengungkapan Disclosure	Site			
	Tambang Emas Tujuh Bukit Tujuh Bukit Gold Mine	Tambang Tambaga Wetar Wetar Copper Mine	Tambang Nikel Konawe Konawe Nickel Mine	Tambang Emas Pani Pani Gold Mine
Lokasi operasional [101-5] [14.4.5] Operational locations	Tambang Emas Tujuh Bukit berlokasi di Pulau Merah, Dusun Pancer, Desa Sumberagung, Kecamatan Pesanggaran, Kabupaten Banyuwangi, Provinsi Jawa Timur, Indonesia, pada koordinat sekitar 8°37'25,2" Lintang Selatan dan 114°02'35,0" Bujur Timur. The Tujuh Bukit Gold Mine is located in Pulau Merah, Dusun Pancer, Sumberagung Village, Pesanggaran District, Banyuwangi Regency, East Java Province, Indonesia, at approximately 8°37'25.2" South Latitude and 114°02'35.0" East Longitude.	Operasional Wetar berlokasi di Pulau Wetar, Provinsi Maluku, Indonesia, pada koordinat sekitar 7°07'82,33" Lintang Selatan dan 126°27'89,64" Bujur Timur. The Wetar operation is located on Wetar Island, Maluku Province, Indonesia, at approximately 7°07'82,33" South Latitude and 126°27'89,64" East Longitude.	Operasional PT SCM berlokasi di Desa Lalomerui, Kecamatan Rota, Kabupaten Konawe, Provinsi Sulawesi Tenggara, Indonesia, dengan koordinat geografis sekitar 121°43'15"-121°56'00" Bujur Timur dan 2°55'07"-3°04'00" Lintang Selatan. PT SCM operations are located in Lalomerui Village, Rota District, Konawe Regency, Southeast Sulawesi Province, Indonesia, with geographic coordinates approximately 121°43'15"-121°56'00" East Longitude and 2°55'07"-3°04'00" South Latitude.	Wilayah operasional Pani (PETS, GSM, dan PBT) berlokasi di Provinsi Sulawesi Tengah, Indonesia, dengan kisaran koordinat antara 121°57'58,00" hingga 122°05'00,00" Bujur Timur dan 0°32'05,51" hingga 0°36'00,00" Lintang Utara. The Pani operations (PETS, GSM, and PBT) are located in Central Sulawesi Province, Indonesia, within coordinates ranging from 121°57'58.00" to 122°05'00.00" East Longitude and 0°32'05.51" to 0°36'00.00" North Latitude.
Luas lokasi yang berpotensi berdampak terhadap keanekaragaman hayati Area potentially impacting biodiversity	766,74 Ha	2.733 Ha	21.100 ha	7.326,87 Ha

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Pengungkapan Disclosure	Site			
	Tambang Emas Tujuh Bukit Tujuh Bukit Gold Mine	Tambang Tambaga Wetar Wetar Copper Mine	Tambang Nikel Konawe Konawe Nickel Mine	Tambang Emas Pani Pani Gold Mine
Kegiatan operasional [101-6][14.4.6] Operational Activities	Eksplorasi, penambangan, dan pemurnian emas dan tembaga Exploration, mining, and refining of gold and copper	Eksplorasi, penambangan, dan pemurnian tembaga Exploration, mining, and refining of copper	Eksplorasi dan penambangan nikel Exploration and mining of nickel	Eksplorasi, penambangan, dan pemurnian emas Exploration, mining, and refining of gold
Jarak lokasi di atau dekat dengan Kawasan sensitif secara ekologis Distance of the site from or proximity to ecologically sensitive areas	5-10 Km dari Hutang Lindung, Taman Nasional 5-10 km from Protected Forests and National Parks	5 Km dari Suaka Margasatwa Danau Tihu dan 72 Km dari Kawasan Konservasi Perairan Wetar 5 km from Lake Tihu Wildlife Sanctuary and 72 km from the Wetar Marine Conservation Area	1 km dari Key Biodiversity Area Rوتا, 19,4 Km dari Nature Recreation Park Danau Towuti, dan terletak di dalam kawasan Endemic Bird Area 1 km from the Rوتا Key Biodiversity Area, 19.4 km from Towuti Lake Nature Recreation Park, and located within the Endemic Bird Area	500 m dari Key Biodiversity Area Panua emas atau Protected Area Panua Nature Reserve 500 m Panua Key Biodiversity Area or Panua Nature Reserve Protected Area
Konversi ekosistem alami Conversion of natural ecosystems				
Ukuran konversi sejak tahun batas akhir atau tanggal acuan Extent of conversion since the cut-off year or date	-*	-*	-*	332.32 ha
Tahun batas akhir atau tanggal acuan Cutoff year or reference date	-*	-*	-*	2023
Jenis ekosistem sebelum konversi Type of ecosystem prior to conversion	Hutan alam dataran rendah, hutan jati lowland natural forest and teak forest ecosystems	Ekosistem hutan dataran kering yang terdiri dari hutan primer dan sekunder Dryland forest ecosystems, including both primary and secondary forests	Hutan Hujan Tropis, semak/belukar, tanah terbuka, pertanian lahan kering campuran, padang rumput, pertanian lahan kering tropical rainforest, shrubland, open land, grassland, and mixed dryland agriculture	Ekosistem hutan dataran kering primer dan sekunder dryland forest ecosystems, including primary and secondary forests
Jenis ekosistem setelah konversi Ecosystem type after conversion	Ekosistem tambang dan tempat tinggal Mining ecosystem and settlement	Ekosistem tambang dan tempat tinggal Mining ecosystem and settlement	Ekosistem tambang dan tempat tinggal Mining ecosystem and settlement	Ekosistem tambang dan tempat tinggal Mining ecosystem and settlement
Konversi ekosistem yang digunakan atau dimodifikasi menjadi yang lain Conversion of ecosystems that have been used or modified into other types				
Ukuran ekosistem yang dikonversi Size of the converted ecosystem	70,67 ha	48.07 ha	24.82 ha	-**

Pengungkapan Disclosure	Site			
	Tambang Emas Tujuh Bukit Tujuh Bukit Gold Mine	Tambang Tambaga Wetar Wetar Copper Mine	Tambang Nikel Konawe Konawe Nickel Mine	Tambang Emas Pani Pani Gold Mine
Jenis ekosistem sebelum konversi Type of ecosystem before conversion	Ekosistem tambang dan tempat tinggal Mining ecosystem and settlement	Ekosistem tambang dan tempat tinggal Mining ecosystem and settlement	Ekosistem tambang dan tempat tinggal Mining ecosystem and settlement	-
Jenis eksosistem setelah konversi Type of ecosystem after conversion	Lahan reklamasi reclamation land	Lahan reklamasi reclamation land	Lahan reklamasi reclamation land	-
Spesies invasif Invasive species				
Mitigasi Mitigation	Area operasional BSI memiliki risiko invasi spesies asing yang dikelola melalui penerapan SOP pengendalian spesies invasif, pemantauan rutin flora dan fauna, serta penanaman spesies lokal untuk menjaga keseimbangan ekosistem The BSI operational area faces risks from invasive alien species, which are managed through the implementation of invasive species control SOPs, regular flora and fauna monitoring, and the use of native species for revegetation	Hingga saat ini, tidak teridentifikasi potensi signifikan terkait spesies asing invasif di area operasional Wetar To date, no significant risks related to invasive alien species have been identified in the Wetar operational area	Area operasional PT SCM menghadapi risiko spesies invasif seperti Chromolaena odorata, Melastoma hirta, dan Lantana camara, yang dikelola melalui pembukaan lahan terbatas, pengelolaan biomassa, penanaman cover crop, spesies pionir, serta penguatan penggunaan spesies lokal PT SCM's operational area faces invasive species risks, including Chromolaena odorata, Melastoma hirta, and Lantana camara, which are managed through controlled land clearing, biomass management, cover crop planting, pioneer species planting, and the use of native species	Area operasional Pani memiliki potensi spesies asing invasif yang dimitigasi melalui pembatasan area bukaan lahan, pemantauan biodiversitas, pembentukan zona lindung atau buffer di sekitar habitat penting, serta upaya menjaga konektivitas habitat The Pani operational area has potential risks from invasive alien species, which are mitigated through controlled land clearing, biodiversity monitoring, establishment of protected or buffer zones around key habitats, and efforts to maintain habitat connectivity
Kondisi ekosistem tahun dasar [101-7][14.4.7] Base-year ecosystem conditions	Hutan alam dataran rendah dan hutan jati dengan tutupan vegetasi rapat serta tingkat keanekaragaman hayati yang tinggi Lowland natural forest and teak forest with dense vegetation cover and high biodiversity	Ekosistem terestrial berupa hutan lahan kering pada tanah ultrabasic dengan karakteristik vegetasi yang khas dan adaptif terrestrial ecosystems, particularly dryland forests on ultrabasic soils with distinctive and adaptive vegetation characteristics	Hutan dataran kering primer dan sekunder dengan struktur vegetasi yang relatif alami primary and secondary dryland forests with relatively natural vegetation structure	
Penetapan tahun dasar Establishment of the base year	2015	2010	2020	2024

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Pengungkapan Disclosure	Site			
	Tambang Emas Tujuh Bukit Tujuh Bukit Gold Mine	Tambang Tambaga Wetar Wetar Copper Mine	Tambang Nikel Konawe Konawe Nickel Mine	Tambang Emas Pani Pani Gold Mine
Kondisi ekosistem di tahun pelaporan Ecosystem conditions in the reporting year	Kondisi biodiversitas di area BSI menunjukkan keanekaragaman burung pada kategori tinggi (H' 2,98-3,24) dan mamalia pada kategori rendah hingga sedang (H' 0,98-2,27) dengan pemerataan tinggi (E' 0,88-0,96), meskipun terdapat indikasi dominansi spesies tertentu di beberapa lokasi pemantauan Biodiversity conditions at the BSI site indicate high bird diversity (H' 2.98-3.24) and low to moderate mammal diversity (H' 0.98-2.27), with high evenness (E' 0.88-0.96), although some locations show dominance by certain species.	Kondisi ekosistem di Wetar didominasi oleh hutan monsun yang relatif stabil, dengan 27 jenis burung teridentifikasi namun sebagian memiliki kepadatan populasi rendah, sehingga berpotensi rentan terhadap perubahan tutupan lahan Ecosystem conditions in Wetar are characterized by relatively stable monsoon forest, with 27 bird species recorded, some with low population density, indicating potential vulnerability to land cover changes	Kondisi biodiversitas di area PT SCM menunjukkan keanekaragaman vegetasi yang tinggi (H' >3) dan keanekaragaman fauna pada kategori sedang hingga tinggi (H' 1-3), dengan pemerataan tinggi (E' >0,6) yang mencerminkan distribusi spesies yang relatif merata Biodiversity conditions at PT SCM indicate high vegetation diversity (H' >3) and moderate to high fauna diversity (H' 1-3), with high evenness (E' >0.6), reflecting relatively balanced species distribution	Hasil pemantauan menunjukkan indeks keanekaragaman tumbuhan tergolong tinggi, sedangkan indeks burung, herpetofauna, dan serangga berada pada kategori sedang. Variasi indeks dipengaruhi oleh kelimpahan dan distribusi spesies yang teramati pada lokasi pemantauan Monitoring results indicate that the vegetation diversity index is high, while bird, herpetofauna, and insect indices fall within the moderate category. Index variation is influenced by species abundance and distribution observed at monitoring locations

Manfaat Ekosistem Ecosystem Benefits				
Jenis manfaat ekosistem [101-8][14.4.8] Types of Ecosystem Benefits	Ekosistem di area BSI menyediakan berbagai jasa ekosistem, termasuk jasa penyediaan seperti kayu, hasil hutan bukan kayu (rotan, bambu, getah, madu), tumbuhan obat, ikan, air sungai, dan satwa buruan yang dimanfaatkan di sekitar area Kali Kuning dan Partolang Ecosystems in the BSI area provide various ecosystem services, including provisioning services such as timber, non-timber forest products (rattan, bamboo, resin, honey), medicinal plants, fish, river water, and game species utilized around the Kali Kuning and Partolang areas	Ekosistem di area Wetar menyediakan jasa ekosistem berupa sumber air permukaan yang penting, termasuk Sungai Besar dan Sungai Wetuk, yang mendukung kegiatan operasional dan kebutuhan lingkungan sekitar Ecosystems in the Wetar area provide essential ecosystem services, particularly surface water resources such as Sungai Besar and Sungai Wetuk, which support operational activities and surrounding environmental needs	Ekosistem di area PT SCM menyediakan berbagai jasa penyediaan, termasuk sumber daya alam seperti air, tanah, batuan, hasil hutan (buah, madu, damar, kayu), ikan, satwa buruan, serta tanaman obat yang mendukung kebutuhan masyarakat sekitar Ecosystems in the PT SCM area provide a range of provisioning services, including natural resources such as water, soil, and minerals, as well as forest products (fruits, honey, resin, timber), fish, game species, and medicinal plants that support local community needs	Kawasan Panua Nature Reserve sebagai kawasan lindung terdekat menyediakan berbagai layanan ekosistem penting yaitu layanan penyediaan seperti kayu furnitur, penyedia pakan dan pangan, serta layanan pengaturan dan pemeliharaan seperti sebagai peneduh dan tanaman pionir The Panua Nature Reserve, as the nearest protected area, provides various important ecosystem services, including provisioning services such as timber for furniture, fodder, and food supply, as well as regulating and pioneer vegetation.

Pengungkapan Disclosure	Site			
	Tambang Emas Tujuh Bukit Tujuh Bukit Gold Mine	Tambang Tambaga Wetar Wetar Copper Mine	Tambang Nikel Konawe Konawe Nickel Mine	Tambang Emas Pani Pani Gold Mine
Penerima manfaat ekosistem Ecosystem beneficiaries	Masyarakat Desa Sumberagung, Kecamatan Pesanggaran, Kabupaten Banyuwangi Communities in Sumberagung Village, District Pesanggaran, Banyuwangi Regency	Masyarakat Desa Uhak, Kecamatan Wetar Utara, Kabupaten Maluku Barat Daya Communities in Uhak village, District North Wetar, Southwest Maluku Regency	Masyarakat Desa Lalomerui, Walandawe, Bahodopi Keurea Communities of Lalomerui, Walandawe, Bahodopi, and Keurea	Masyarakat Desa Hulawa, Kecamatan Buntulia, Kabupaten Pohuwato Hulawa Village, Buntulia District, Pohuwato Regency

*batas akhir atau tanggal acuan belum di tentukan/cut-off date or reference date has not yet determined
**Tambang Emas Pani berada di tahap revegetasi/Pani Gold Mine at early revegetation stage

Seluruh entitas anak Merdeka melakukan identifikasi spesies endemik dan dilindungi sebelum operasi, serta mengembangkan sistem perlindungan dan pemantauan untuk menjaga kelestariannya.

All Merdeka subsidiaries identify endemic and protected species prior to operations and develop protection and monitoring systems to ensure their conservation.

Merdeka telah menyusun dan mengimplementasikan Rencana Pengelolaan Keanekaragaman Hayati (*Biodiversity Management Plan/BMP*). BMP ini mencakup langkah-langkah mitigasi yang akan dilaksanakan untuk menghindari, meminimalkan, dan mengembalikan dampak selama fase konstruksi dan operasi, serta menetapkan struktur tata kelola untuk implementasi BMP. Penyusunan BMP tersebut dilakukan oleh pihak ketiga yang independen seperti Lorax Indonesia dan Universitas Negeri Gorontalo.

Merdeka has developed and implemented a Biodiversity Management Plan (BMP). This BMP includes mitigation measures to be implemented to avoid, minimize, and restore impacts during the construction and operational phases, as well as establishing a governance structure for BMP implementation. The development of the BMP was commissioned to independent parties such as Lorax Indonesia and State University of Gorontalo.

Selain itu, SCM telah menandatangani Nota Kesepahaman Badan Konservasi Sumber Daya Alam (BKSDA) Sulawesi Tenggara untuk mendukung pelestarian satwa dilindungi di area IUP SCM. Kerja sama ini mencakup kegiatan identifikasi, inventarisasi dan pemantauan, pembinaan habitat dan populasi, serta upaya konservasi satwa dilindungi.

In addition, SCM has signed a Memorandum of Understanding with the Southeast Sulawesi Natural Resources Conservation Agency (BKSDA) to support the conservation of protected wildlife within SCM's IUP area. This collaboration includes identification, inventory and monitoring, habitat and population management, as well as conservation efforts for protected species.

Sebagai tindak lanjut dari BMP dan Nota Kesepahaman tersebut, Tambang Nikel Konawe telah memulai program konservasi Anoa (*Bubalus spp.*), yang melibatkan identifikasi dan pemasangan papan petunjuk di lokasi penyeberangan Anoa di jalan akses. Program ini juga mencakup pemasangan perangkap kamera untuk spesies prioritas, pengkayaan sumber makanan Anoa di area dengan aktivitas manusia berintensitas rendah, serta upaya untuk meminimalkan konflik dengan satwa liar. [F.10]

As a follow-up to the BMP and the Memorandum of Understanding, the Konawe Nickel Mine has launched an Anoa (*Bubalus spp.*) conservation program, which involves identifying and installing warning signs at Anoa crossing points along access roads. This program also includes the installation of camera traps for priority species, the enrichment of Anoa food sources in areas with low-intensity human activity, and efforts to minimize conflicts with wildlife.

Pada tahun 2025, Tambang Emas Pani telah mengajukan permohonan Perjanjian Kerja Sama (PKS) kepada BKSDA Sulawesi Utara dalam rangka penguatan fungsi kawasan suaka alam untuk konservasi keanekaragaman hayati di Cagar Alam Panua. Inisiatif ini menegaskan komitmen Perseroan dalam mendukung perlindungan spesies kunci, seperti maleo dan anoa. Proposal PKS tersebut telah memperoleh dukungan awal dan telah diteruskan oleh Direktur Jenderal Konservasi Sumber Daya Alam dan Ekosistem (KSDAE) kepada Menteri Kehutanan sebagai bagian dari proses persetujuan lebih lanjut.

In 2025, Pani Gold Mine submitted an application for a Cooperation Agreement (PKS) to the North Sulawesi (BKSDA) to strengthen the function of a nature reserve area for biodiversity conservation in the Panua Nature Reserve. This initiative underscores the Company's commitment to supporting the protection of key species, such as maleo and anoa. The PKS proposal has received initial support and has been forwarded by the Director General of Natural Resources and Ecosystem Conservation (KSDAE) to the Minister of Forestry as part of the further approval process.

Dari total flora dan fauna yang terpantau, terdapat beberapa spesies yang masuk kategori *International Union for Conservation of Nature (IUCN) Red List*. Di Tambang Nikel Konawe, ditemukan spesies seperti Monyet Butung (*Macaca ochreata*) dan Soa Layar (*Hydrosaurus Weberi*), sementara di Tambang Emas Tujuh Bukit ditemukan spesies seperti Elang Jawa (*Nisaetus bartelsi*) dan Rangkong Badak (*Buceros rhinoceros*). Di Tambang Tembaga Wetar, ditemukan spesies seperti Delimukan Wetar (*Pampusana hoedtii*), dan Merpati-Hitam Timor (*Turacoena modesta*). Di Tmbang Emas Pani, ditemukan Monyet dihe (*Macaca hecki*) dan Julang Sulawesi (*Rhyticeros cassidix*). [304-4]

From the total flora and fauna monitored, several species are classified under the International Union for Conservation of Nature (IUCN) Red List. At the Konawe Nickel Mine, species identified include the Buton macaque (*Macaca ochreata*) and the Weber's sailfin lizard (*Hydrosaurus weberi*). At the Tujuh Bukit Gold Mine, species recorded include the Javan hawk-eagle (*Nisaetus bartelsi*) and the rhinoceros hornbill (*Buceros rhinoceros*). At the Wetar Copper Mine, species identified include the Wetar ground dove (*Pampusana hoedtii*) and the Timor black pigeon (*Turacoena modesta*). Meanwhile, at the Pani Gold Mine, species recorded include the Heck's macaque (*Macaca hecki*) and the knobbed hornbill (*Rhyticeros cassidix*).

Dari total flora dan fauna yang terpantau, terdapat beberapa spesies yang masuk kategori *International Union for Conservation of Nature (IUCN) Red List* sebagai berikut: [304-4]

Of the total flora and fauna monitored, several species are listed in the International Union for Conservation of Nature (IUCN) Red List as follows:

Kategori spesies fauna daftar merah IUCN IUCN Red List fauna species categories	Tambang Emas Tujuh Bukit Tujuh Bukit Gold Mine	Tambang Tembaga Wetar Wetar Copper Mine	Tambang Nikel Konawe Konawe Nickel Mine	Tambang Emas Pani Pani Gold Mine
Critically Endangered	2	0	1	0
Endangered	4	1	4	1
Vulnerable	6	0	16	90
Near Threatened	7	6	9	6
Least Concerned	189	39	139	222
Total	208	46	169	319

Selain itu, MTI telah mendapatkan rekomendasi dari pemerintah lokal untuk melakukan restorasi mangrove di lahan seluas 14,94 hektar. Sejak program restorasi mangrove dilaksanakan sampai dengan tahun 2025, MTI telah melakukan penanaman 4.535 pohon mangrove. Selain sejalan dengan komitmen pengelolaan keanekaragaman hayati Merdeka, restorasi mangrove tersebut juga merupakan upaya offsetting emisi GRK Merdeka.

In addition, MTI has obtained a recommendation from the local government to carry out mangrove restoration on an area of 14.94 hectares. Since the implementation of the mangrove restoration program through 2025, MTI has planted 4,535 mangrove trees. In addition to aligning with Merdeka's commitment to biodiversity management, the mangrove restoration also serves as an effort to offset Merdeka's greenhouse gas emissions.

Pelatihan dan Kepedulian terhadap Pelestarian Lingkungan

Merdeka berkomitmen membangun budaya keberlanjutan dengan memperkenalkan Kebijakan Lingkungan kepada karyawan baru, kontraktor, dan pengunjung area operasional. Kebijakan ini disampaikan melalui program orientasi serta pelatihan Kode Etik Keberlanjutan Pemasok. Selain itu, kebijakan tersebut dipublikasikan di situs web perusahaan dan ditempatkan di lokasi strategis di kantor untuk memastikan aksesibilitas dan visibilitas yang optimal.

Training and Commitment to Environmental Conservation

Merdeka is committed to building a culture of sustainability by introducing the Environmental Policy to new employees, contractors, and visitors to operational areas. This policy is communicated through orientation programs and training on the Supplier Sustainability Code of Conduct. Additionally, the policy is published on the company's website and displayed in strategic locations within the office to ensure optimal accessibility and visibility.

Upaya ini bertujuan untuk meningkatkan kesadaran seluruh pihak mengenai pentingnya pelestarian lingkungan. Komunikasi terkait pengelolaan lingkungan dilakukan baik secara internal maupun eksternal melalui berbagai saluran, rapat divisi lingkungan, intranet, email, mekanisme pengaduan, media sosial, dan laporan keberlanjutan.

These efforts aim to raise awareness among all stakeholders regarding the importance of environmental conservation. Communication regarding environmental management is conducted both internally and externally through various channels, including environmental division meetings, the intranet, email, complaint mechanisms, social media, and sustainability reports.

Untuk memastikan kepatuhan terhadap peraturan pemerintah dan standar lingkungan internasional, Merdeka secara rutin mengadakan pelatihan terkait aspek pelestarian lingkungan. Pelatihan ini ditujukan bagi karyawan, mitra kerja, dan kontraktor.

To ensure compliance with government regulations and international environmental standards, Merdeka regularly conducts training on environmental conservation. This training is intended for employees, business partners, and contractors.

Tambang Emas Tujuh Bukit menyelenggarakan berbagai pelatihan lingkungan yang mencakup aspek reklamasi pascatambang, pengelolaan limbah B3, pengendalian pencemaran air, hingga sistem manajemen lingkungan berbasis ISO 14001:2015. Sebanyak 16 karyawan mengikuti pelatihan ini sebagai bagian dari upaya peningkatan kompetensi dalam pengelolaan lingkungan yang terintegrasi dan sesuai regulasi.

The Tujuh Bukit Gold Mine organizes various environmental training programs covering post-mining reclamation, hazardous waste management, water pollution control, and an ISO 14001:2015-based environmental management system. A total of 16 employees participated in this training as part of efforts to enhance competencies in integrated and regulation-compliant environmental management.

Pelatihan di Tambang Tembaga Wetar difokuskan pada pelaksanaan reklamasi, pemantauan kualitas air, serta pemenuhan peraturan lingkungan hidup dalam kegiatan pertambangan. Sebanyak 11 peserta mengikuti pelatihan dengan total durasi 16 jam untuk memperkuat kapasitas operasional dalam pengelolaan lingkungan yang patuh dan berkelanjutan.

Training at the Wetar Copper Mine focused on the implementation of reclamation, water quality monitoring, and compliance with environmental regulations in mining activities. A total of 11 participants attended the training, which lasted 16 hours, to strengthen operational capacity in compliant and sustainable environmental management.

Tambang Nikel Konawe melaksanakan pelatihan lingkungan yang mencakup sistem manajemen lingkungan ISO 14001, reklamasi dan pascatambang, pengelolaan limbah B3, serta dasar-dasar AMDAL. Program ini diikuti oleh 12 karyawan dan 67 karyawan kontraktor dengan total 220 jam pelatihan untuk karyawan dan 134 jam untuk kontraktor, sebagai bagian dari penguatan kompetensi lintas fungsi dalam pengelolaan lingkungan.

The Konawe Nickel Mine conducted environmental training covering the ISO 14001 environmental management system, reclamation and post-mining activities, hazardous waste management, and the basics of Environmental Impact Assessment. This program was attended by 12 employees and 67 contractor employees, totaling 220 hours of training for employees and 134 hours for contractors, as part of strengthening cross-functional competencies in environmental management.

Pabrik AIM menyelenggarakan pelatihan lingkungan melalui program ECO Learn, Eco Move, dan Eco Green Talk yang berfokus pada peningkatan kesadaran dan keterlibatan dalam pengelolaan limbah dan praktik ramah lingkungan. Sebanyak 43 karyawan dan 8 kontraktor mengikuti pelatihan ini dengan total durasi 15,5 jam untuk karyawan dan 2 jam untuk kontraktor.

The AIM Plant conducted environmental training through the ECO Learn, Eco Move, and Eco Green Talk programs, which focus on raising awareness and engagement in waste management and eco-friendly practices. A total of 43 employees and 8 contractors participated in this training, with a total duration of 15.5 hours for employees and 2 hours for contractors.

Program ini dirancang untuk memastikan setiap individu memahami perubahan peraturan dan standar lingkungan, isu-isu lingkungan yang relevan, serta tata cara pencegahan dan remediasi dampak lingkungan, sehingga mampu menerapkan praktik terbaik dalam operasional sehari-hari. [F.1] [2-24]

This program is designed to ensure that every individual understands changes in environmental regulations and standards, relevant environmental issues, as well as procedures for preventing and remediating environmental impacts, so that they are able to apply best practices in their daily operations.

Biaya Lingkungan
Environmental Costs

Biaya Cost	2023 USD	2024 USD	2025 USD
Biaya pengelolaan lingkungan Environmental management cost	5,515,929	4,188,712	8,236,139
Biaya pemantauan lingkungan Environmental monitoring cost	2,351,520	1,208,990	1,986,777
Total	7,867,449	5,397,702	10,222,916

Komitmen Merdeka terhadap tanggung jawab lingkungan diwujudkan melalui alokasi dana yang signifikan untuk pengelolaan dan perlindungan lingkungan. Pada tahun 2025, Merdeka melanjutkan investasi di bidang lingkungan sebagai bagian dari upaya berkelanjutan untuk melestarikan ekosistem sekaligus mendukung praktik keberlanjutan. Dana tersebut dialokasikan untuk mendukung penelitian inovatif dan kolaborasi strategis di sektor lingkungan, kegiatan pemantauan berkala untuk memastikan kepatuhan terhadap standar lingkungan, serta berbagai inisiatif lain yang bertujuan untuk menjaga keseimbangan ekologi di wilayah operasional perusahaan. [F.4]

Merdeka's commitment to environmental responsibility is demonstrated through significant funding allocations for environmental management and protection. In 2025, Merdeka continued its investments in environmental initiatives as part of ongoing efforts to preserve ecosystems while supporting sustainable practices. These funds are allocated to support innovative research and strategic collaborations in the environmental sector, periodic monitoring activities to ensure compliance with environmental standards, and various other initiatives aimed at maintaining ecological balance in the company's operational areas.



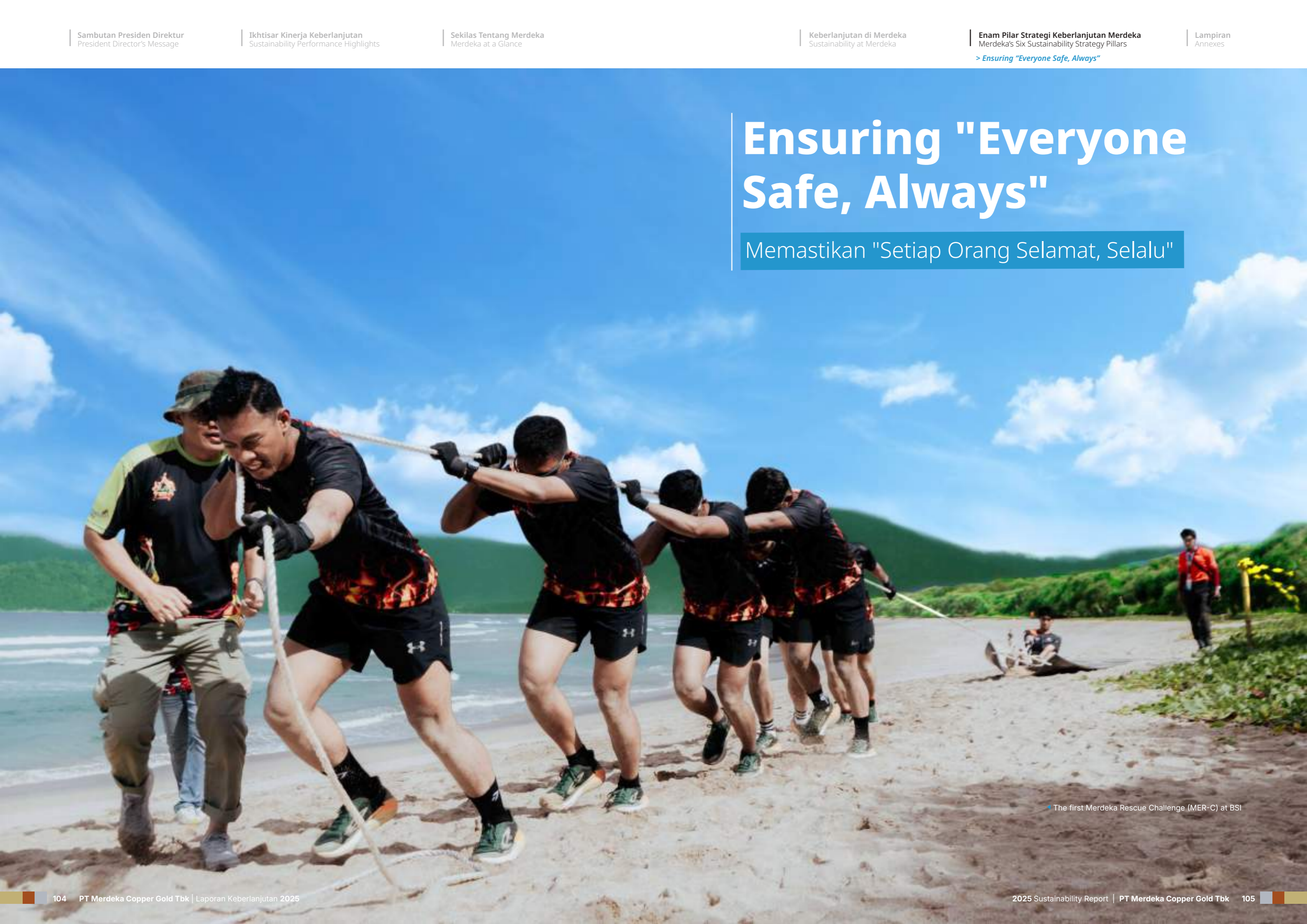
▲ Biodiversity at Pani Gold Mine, Tujuh Bukit Gold Mine, and Konawe Nickel Mine



Land reclamation at SCM

Ensuring "Everyone Safe, Always"

Memastikan "Setiap Orang Selamat, Selalu"



• The first Merdeka Rescue Challenge (MER-C) at BSI

Setiap Orang Selamat, Selalu

Everyone Safe, Always!

2025 Performance*

Incident prevention and fatality elimination

- > LTIR: 0.10
- > TRIFR: 0.35
- > 1 fatality

Employee Wellness

- > Provided medical check-ups to all Merdeka employees
- > Monitored all employees with medical high risk such as uncontrolled hypertension, diabetes, and hypercholesterolemia

OHS training

Conducted OHS training to 1,987 employees with a total of 34,500 training hours, and OHS training to 2,635 contractor employees with a total of 39,348 training hours

OHS Management Systems

- > SMK3 audit achieved score of average 75.48%.
 - BSI 77%
 - SCM 61.50%
 - BKP 62.60%
 - PETS 88.43%
 - GSM 87.86%
- > 100% of Merdeka's business units had obtained ISO 45001:2018 certified
- > Gold Award for the Occupational Health and Safety Management System for MTI from the Minister of Manpower



2026 Target*

Incident prevention and fatality elimination

- > Lower than LTIFR 0.10
- > Lower than TRIFR 0.35
- > Zero fatality

Employee Wellness

- > Ensure all Merdeka employees and contractors undergo medical check-ups
- > Monitor medical high-risk employees and contractors to ensure they can perform their roles productively

OHS training

Conduct OHS training as per the 2026 training schedule

OHS Management Systems

- > Conduct SMK3 Audits that are above the national average scoring
- > Maintain that all Merdeka's business units are 100% ISO 45001:2018 certified

*The 2025 performance and 2026 targets presented above cover both Merdeka's employees and contractors across all operations

Sistem Manajemen Kesehatan dan Keselamatan Kerja [3-3][14.16.1][14.16.2]

Sebagai sektor dengan tingkat risiko pekerjaan yang tinggi, industri pertambangan menuntut penerapan standar keselamatan yang ketat. Merdeka menempatkan pengelolaan Kesehatan dan Keselamatan Kerja (K3) sebagai salah satu prioritas utama dalam setiap kegiatan operasionalnya. Setiap entitas anak perusahaan secara aktif menerapkan pengelolaan aspek K3 untuk memastikan perlindungan bagi seluruh karyawan, keluarga mereka, serta masyarakat yang berada di sekitar wilayah operasi.

Occupational Health and Safety Management System

As an industry with inherently high occupational risks, mining requires strict adherence to safety standards. Merdeka places Occupational Health and Safety (OHS) management as a top priority in all operational activities. Each subsidiary actively manages OHS aspects to ensure the protection of all employees, their families, and communities surrounding operational areas.

Perusahaan telah menyusun Kebijakan K3 sebagai komitmen untuk mematuhi regulasi pemerintah dan standar industri. Kebijakan ini menjadi pedoman utama bagi Merdeka, seluruh entitas anak, serta kontraktor dalam menciptakan tempat kerja yang aman dan sehat, mencegah terjadinya kecelakaan, penyakit akibat kerja, maupun insiden berbahaya. Melalui penerapan kebijakan ini, Merdeka menumbuhkan budaya tanggung jawab bersama terhadap keselamatan dan kesehatan kerja untuk mewujudkan tujuannya perusahaan: "Everyone Safe, Always". Kebijakan K3 Merdeka dapat diakses pada: [Kebijakan Kesehatan dan Keselamatan K3](#).

Untuk memastikan perlindungan terhadap seluruh karyawan dari potensi bahaya dan risiko yang mungkin timbul selama kegiatan pertambangan maupun aktivitas pendukung, Merdeka mengimplementasikan Sistem Manajemen Kesehatan dan Keselamatan Kerja yang terintegrasi dengan standar ISO 45001:2018 tentang Sistem Manajemen Keselamatan dan Kesehatan Kerja, Sistem Manajemen Keselamatan Pertambangan (SMKP) untuk kegiatan pertambangan, serta Sistem Manajemen Kesehatan dan Keselamatan Kerja (SMK3) untuk kegiatan industri.

Penerapan SMKP di Merdeka dilakukan dengan mengacu pada Peraturan Menteri Energi dan Sumber Daya Mineral (ESDM) No. 26 Tahun 2018 tentang Pelaksanaan Kaidah Pertambangan yang Baik dan Pengawasan Pertambangan Mineral dan Batubara, serta Keputusan Menteri ESDM No. 1827 K/30/MEM/2018 mengenai Pedoman Pelaksanaan Kaidah Teknik Pertambangan yang Baik dan SMK3 diimplementasikan sesuai dengan Peraturan Pemerintah No. 50 Tahun 2012 tentang Penerapan SMK3, serta selaras dengan standar internasional ISO 45001:2018 untuk memperkuat praktik K3 di seluruh wilayah operasi.

Sistem manajemen yang diterapkan mencakup seluruh tahapan kegiatan, mulai dari proses pengadaan hingga kesiapsiagaan darurat, dengan tujuan mencapai kinerja yang aman, efisien, dan berkelanjutan. Merdeka mendorong komunikasi terbuka dan partisipasi aktif seluruh karyawan, kontraktor, serta pemangku kepentingan dalam penerapan K3. Perusahaan juga menjalankan inisiatif gaya hidup sehat, memastikan pelaporan dan investigasi cepat atas insiden, serta menerapkan tindakan korektif untuk mencegah kejadian berulang, guna memperkuat sistem manajemen K3 yang terintegrasi dan preventif.

Untuk memastikan efektivitas penerapan SMKP, SMK3, dan ISO 45001:2018, Merdeka mengintegrasikan ketiga sistem tersebut ke dalam Manual Sistem Manajemen Kesehatan, Keselamatan Kerja, dan Lingkungan (SMK3L) yang disusun berdasarkan kerangka kerja manajemen *Plan-Do-Check-Act* (PDCA). Dokumen ini menjadi acuan utama dalam pelaksanaan K3L dan wajib diterapkan oleh seluruh entitas anak, karyawan, kontraktor, mitra kerja, pengunjung, serta pemangku kepentingan terkait. Melalui penerapan konsep PDCA yang bersifat siklus dan berkelanjutan, Merdeka berupaya mencapai tujuan strategis perusahaan sekaligus mendorong peningkatan kinerja secara berkelanjutan.

The Company has established an OHS Policy as a commitment to comply with government regulations and industry standards. The policy serves as a primary guideline for Merdeka, its subsidiaries, and contractors to create a safe and healthy workplace while preventing accidents, occupational illnesses, and hazardous incidents. By implementing this policy, Merdeka promotes a culture of shared responsibility for occupational health and safety, supporting the company's goal: "Everyone Safe, Always". The Merdeka OHS Policy is available at: [Occupational Health and Safety Policy](#).

To ensure comprehensive protection for all employees against potential hazards and risks arising from mining operations and supporting activities, Merdeka has implemented an integrated Occupational Health and Safety Management System aligned with ISO 45001:2018 standards, the Mining Safety Management System (SMKP) for mining operations, and the Occupational Health and Safety Management System (SMK3) for industrial activities.

The implementation of the Mining Safety Management System (SMKP) at Merdeka is guided by the Ministry of Energy and Mineral Resources Regulation No. 26 of 2018 on the Implementation of Good Mining Practices and Supervision of Mineral and Coal Mining, as well as Ministerial Decree No. 1827 K/30/MEM/2018 on Guidelines for the Implementation of Good Mining Techniques. Meanwhile, the Occupational Health and Safety Management System (SMK3) is applied in accordance with Government Regulation No. 50 of 2012 on SMK3 implementation and aligned with ISO 45001:2018 international standards to strengthen OHS practices across all operational sites.

The management system covers all stages of operations, from procurement to emergency preparedness, with the goal of achieving safe, efficient, and sustainable performance. Merdeka promotes open communication and active participation from all employees, contractors, and stakeholders in OHS implementation. The company also implements healthy lifestyle initiatives, ensures prompt reporting and investigation of incidents, and enforces corrective actions to prevent recurrence, strengthening an integrated and preventive OHS management system.

To ensure the effective implementation of SMKP, SMK3, and ISO 45001:2018, Merdeka integrates these three systems into the HSE Management System Manual, developed following the *Plan-Do-Check-Act* (PDCA) management framework. This manual serves as the primary reference for HSE implementation and is mandatory for all subsidiaries, employees, contractors, business partners, visitors, and relevant stakeholders. By applying the cyclical and continuous PDCA approach, Merdeka strives to achieve its strategic objectives while driving ongoing performance improvements.

Komitmen terhadap K3 juga tertuang dalam Peraturan Perusahaan (PP) dan Perjanjian Kerja Bersama (PKB), yang menjamin perlindungan keselamatan bagi seluruh tenaga kerja meliputi 9.557 karyawan (27%) dan 25.318 karyawan kontraktor (73%), sehingga setiap individu yang terlibat dalam kegiatan operasional Merdeka memperoleh perlindungan terhadap kesehatan dan keselamatan yang sama. [403-1][403-8][14.16.2][14.16.9]

Presiden Direktur memiliki akuntabilitas tertinggi atas strategi dan kinerja Keselamatan dan Kesehatan Kerja (K3) Perusahaan. Untuk mendukung pengawasan dan implementasi K3 yang efektif di seluruh operasi, Perusahaan telah membentuk Komite K3 di setiap lokasi, yang terdiri dari kepala departemen terkait dan perwakilan kontraktor. Selain itu, Perusahaan juga membentuk Komite K3 di tingkat Grup yang terdiri antara lain dari Presiden Direktur, General Manager K3 dan Manajemen Risiko, serta Kepala Teknik Tambang (KTT). Komite-komite ini mendukung Presiden Direktur dalam memantau pelaksanaan strategi K3 dan kinerja keselamatan secara keseluruhan. [F.21][403-7]

Identifikasi Bahaya, Penilaian Risiko, dan Manajemen Insiden [403-2][14.16.3]

Merdeka memiliki Standar Manajemen Risiko dan Peluang untuk memandu penilaian risiko dan peluang di dalam perusahaan. Proses penilaian risiko dan peluang dilakukan secara rutin untuk mengidentifikasi dampak potensial pada tujuan bisnis atau operasional, mengevaluasi bahaya dan efektivitas pengendalian, menetapkan langkah-langkah pengurangan risiko atau mitigasi, dan mengidentifikasi peluang perbaikan. Selain itu, Merdeka menerapkan hierarki pengendalian bahaya yang mencakup pengendalian rekayasa, administratif, praktik kerja, dan penggunaan alat pelindung diri. Perusahaan memastikan bahwa alat pelindung diri yang digunakan telah disesuaikan dengan ukuran dan kebutuhan pekerja, termasuk mempertimbangkan aspek gender, untuk menjamin perlindungan yang optimal, serta dilakukan perawatan, penggantian berkala, dan pelatihan penggunaan guna memastikan efektivitas dan kenyamanan dalam bekerja.

Merdeka melakukan digitalisasi pengelolaan penilaian risiko dan peluang menggunakan aplikasi *M-Safe* dan Merdeka *Risk Management Software*. Aplikasi *M-Safe* digunakan untuk mengelola pelaporan keselamatan, investigasi insiden, serta pemantauan tindakan perbaikan di dalam organisasi. Sistem ini berfungsi sebagai basis data terpusat yang digunakan oleh karyawan dan manajemen untuk mencatat dan mengelola laporan bahaya, TAHAN, ketidaksesuaian, serta laporan insiden. *M-Safe* dirancang untuk memastikan bahwa setiap insiden di tempat kerja didokumentasikan, diinvestigasi, dan ditindaklanjuti secara sistematis. Khusus untuk pengelolaan insiden, sistem ini menggunakan metodologi *Incident Cause Analysis Method (ICAM)*, yang memungkinkan investigator mengidentifikasi faktor-faktor penyebab seperti aspek manusia, organisasi, peralatan, prosedur, dan lingkungan.

Commitment to OHS is further reflected in the Company Regulations (PP) and Collective Labor Agreement (PKB), which guarantee safety protections for all personnel, including 9,557 employees (23%) and 25,318 contractor employees (73%), ensuring that every individual involved in Merdeka's operations receives equal health and safety protection.

The President Director has ultimate accountability for the Company's occupational health and safety (OHS) strategy and performance. To support the effective oversight and implementation of OHS across operations, the Company has established OHS Committees at each site, comprising relevant department heads and contractor representatives. In addition, a Group-level OHS Committee has been established, consisting of the President Director, the General Manager of OHS and Risk Management, and the Head of Mining Engineering (Kepala Teknik Tambang/KTT), among others. These committees support the President Director in monitoring the implementation of OHS strategies and overall safety performance.

Hazard Identification, Risk Assessment, and Incident Management

Merdeka has a Risk and Opportunity Management Standard to guide the assessment of risks and opportunities within the Company. The risk and opportunity assessment process is conducted regularly to identify potential impacts on business or operational objectives, evaluate hazards and the effectiveness of controls, determine risk reduction or mitigation measures, and identify opportunities for improvement. In addition, Merdeka applies a hierarchy of hazard controls, including engineering controls, administrative controls, safe work practices, and the use of personal protective equipment. The Company ensures that the protective equipments is appropriately fitted to workers' sizes and needs, including gender considerations, to provide optimal protection, and is supported by regular maintenance, replacement, and training to ensure effectiveness and comfort in use.

Merdeka digitalizes the risk and opportunity management through *M-Safe* application and Merdeka *Risk Management Software*. *M-Safe* is an application for managing safety reporting, incident investigations, and corrective action tracking within the organization. The system functions as a centralized database used by employees and management to record and manage hazard reports, TAHAN, non-conformances, and incident reports. *M-Safe* is designed to ensure that any incidents in the workplace are properly documented, investigated, and addressed through a systematic process. In particular for incident management, the system uses the *Incident Cause Analysis Method (ICAM)* methodology, enabling investigators to identify contributing factors such as human, organizational, equipment, procedure and environmental aspects.

Merdeka Risk Management Software menggantikan alat sebelumnya yang berbasis Excel dengan platform daring terintegrasi yang memungkinkan risiko dan peluang diidentifikasi, dinilai, dan dipantau di seluruh site dan departemen. Aplikasi ini juga menyediakan berbagai fitur seperti *dashboard* risiko, risk register terpadu, pemantauan tindakan mitigasi, serta notifikasi otomatis untuk mendukung koordinasi yang lebih baik antar pemilik risiko. [3-3][403-1][403-7]

Proses Manajemen Risiko dan Peluang

Proses manajemen risiko dan peluang mengadopsi ISO 31000:2018 Manajemen Risiko Prinsip dan Pedoman dan ISO 45001:2018 SMK3. Penilaian risiko dan peluang didukung oleh akuntabilitas dan kepemimpinan yang jelas, serta sumber daya yang memadai untuk mengelola risiko dan peluang. Selama tahun 2025, Merdeka telah melakukan identifikasi dan penilaian terhadap risiko K3 atas seluruh kegiatan Perusahaan. [3-3][403-1][403-7][403-2]

Proses identifikasi bahaya dan penilaian risiko di Merdeka mencakup berbagai aktivitas berikut:

1. Komunikasi dan konsultasi yang melibatkan para pemangku kepentingan internal dan eksternal untuk memastikan pemahaman yang sama terhadap risiko yang dihadapi.
2. Penetapan konteks dan kriteria, termasuk pengidentifikasian batasan risiko yang dikelola dengan mempertimbangkan faktor internal seperti kebijakan dan target perusahaan, dan faktor eksternal seperti ketentuan regulasi dan kondisi lingkungan.
3. Identifikasi risiko dan peluang bahaya, dengan menganalisis sumber bahaya, area yang berpotensi terkena dampak, serta kemungkinan konsekuensinya untuk mengungkapkan peluang perbaikan.
4. Analisis, penilaian, dan pengendalian risiko, dilakukan melalui evaluasi menyeluruh untuk menentukan tingkat risiko dan langkah-langkah pengendalian yang diperlukan.
5. Penanganan dan pengendalian risiko, dengan memastikan tindakan pengendalian yang diterapkan telah memadai untuk mengurangi risiko ke tingkat yang dapat diterima.
6. Perekaman dan pelaporan, yang mencakup dokumentasi hasil identifikasi, analisis, dan langkah mitigasi yang diambil untuk mendukung proses pemantauan dan pengambilan keputusan.
7. Pemantauan dan peninjauan, dilakukan secara berkala setidaknya satu kali dalam setahun, atau lebih sering jika terjadi kecelakaan, perubahan pada peralatan/proses kerja, atau pengenalan proses kerja baru.

Merdeka Risk Management Software replaces the previous Excel-based tools with an integrated online platform that allows risks and opportunities to be identified, assessed, and monitored across all sites and departments. It also provides features such as risk dashboards, unified risk registers, mitigation action tracking, and automated notifications to support better coordination among risk owners.

Risk and Opportunity Management Process

The risk and opportunity management process adopts ISO 31000:2018 Risk Management Principles and Guidelines and ISO 45001:2018 Occupational Health and Safety Management Systems. Risk and opportunity assessments are supported by clear accountability and leadership, as well as adequate resources to manage risks and opportunities. Throughout 2025, Merdeka conducted the identification and assessment of occupational health and safety risks across all Company activities.

The hazard identification and risk assessment process at Merdeka includes the following activities:

1. Communication and consultation involving internal and external stakeholders to ensure a shared understanding of the risks faced.
2. Establishment of context and criteria, including the identification of risk boundaries to be managed, taking into account internal factors such as company policies and external factors such as regulations and environmental conditions.
3. Identification of hazard risks and opportunities, through analysis of hazard sources, potentially affected areas, and possible consequences.
4. Risk analysis, evaluation, and control, conducted through comprehensive assessments to determine risk levels and the necessary control measures.
5. Risk treatment and control, ensuring that implemented control actions are adequate to reduce risks to acceptable levels.
6. Recording and reporting, including documentation of identification results, analyses, and mitigation measures taken to support monitoring and decision-making processes.
7. Monitoring and review, carried out periodically at least once a year, or more frequently in the event of accidents, changes in equipment or work processes, or the introduction of new work processes.

Aktivitas Penilaian Risiko dan Peluang

Proses Manajemen Risiko dan Peluang di Merdeka mencakup semua tingkat perusahaan. Tabel berikut ini memberi gambaran mengenai jenis-jenis kegiatan Penilaian Risiko dan Peluang yang dilakukan di berbagai tingkat di dalam organisasi Perusahaan. [403-2][14.16.3]

Risk and Opportunity Assessment Activities

The Risk and Opportunity Management process at Merdeka is implemented across all levels of the company. The table below provides an overview of the types of risk and opportunity assessment activities carried out at different levels within the organization.

Aktivitas Activity	Deskripsi Description
Penilaian Sebelum Bekerja (mis. AMANKAH, TAKON7) Pre-Work Assessment (e.g., AMANKAH, TAKON7)	Daftar periksa digunakan oleh pekerja untuk mengidentifikasi potensi bahaya yang berkaitan dengan tugas yang akan mereka kerjakan A checklist used by workers to identify potential hazards related to the task they are about to perform.
Analisis Keselamatan Kerja & Lingkungan (JSEA) Job Safety & Environmental Analysis (JSEA)	Petunjuk kerja langkah demi langkah untuk suatu pekerjaan tertentu yang mencakup potensi bahaya dan pengendaliannya untuk masing-masing langkah Step-by-step work instructions for specific tasks, including hazard identification and control for each step.
Business Risk and Opportunity Assessment (BROA) of Business Unit, Department, Section, Specific Project, Specific Activity Business Risk and Opportunity Assessment (ROA)	Identifikasi Potensi Bahaya, Penilaian Risiko, Pengendalian Penentu (HIRADC) untuk kegiatan Departemen. Identification of potential hazards, risk assessment, and control measures for department activities.
Penilaian Manajemen Perubahan Change Management Assessment	Penilaian untuk mengidentifikasi dampak negatif atau potensi bahaya yang berkaitan dengan suatu perubahan. An assessment to identify negative impacts or potential hazards related to a change.
Kaji Ulang Desain: Studi Operabilitas Potensi Bahaya (HAZOP), Kaji Ulang Keselamatan-Dalam-Desain Design Review: Hazard Operability Study (HAZOP), Safety-in-Design Review	Penilaian risiko yang diterapkan selama tahap desain untuk mengidentifikasi peluang perbaikan desain untuk mengurangi risiko pengoperasian dan pemeliharaan. A risk assessment applied during the design stage to identify design improvement opportunities to reduce operational and maintenance risks.
Penilaian Risiko Proyek Besar Large Project Risk Assessment	Proyek besar di bawah Divisi Projects. Risk assessment for large projects under the Projects Division.
Peristiwa/Kegiatan Berisiko Tinggi High-Risk Events/Activities	Peristiwa atau kegiatan yang dianggap berisiko tinggi. Events or activities deemed to be high-risk.
Akuisisi/JV/Kontrak Besar Acquisitions/JV/Large Contracts	Uji tuntas & kaji ulang Risiko Bisnis. Due diligence and business risk review.
Penilaian Risiko dan Peluang Perusahaan Company-wide Risk and Opportunity Assessment	Kaji ulang risiko ekstrim & tinggi di lingkungan perusahaan. Review of extreme and high risks in the company's environment.
Penilaian Risiko yang dilakukan oleh pihak ketiga Third-Party Risk Assessment	Penilaian risiko yang memerlukan kaji ulang independen atau memerlukan keahlian khusus/teknis untuk melakukan penilaian tersebut. Independent risk assessment or specialized/technical expertise required for certain assessments.

Manajemen Risiko Kritis [403-7][14.15.1][14.16.8]

Sistem Manajemen Risiko Kritis (CRM) adalah alat keselamatan yang dirancang untuk mencegah cedera atau penyakit fatal dan permanen melalui pendekatan yang konsisten dalam pemilihan, definisi, implementasi, verifikasi, dan evaluasi pengendalian kritis untuk mengurangi risiko secara efektif.

Untuk memastikan Sistem Manajemen Risiko Kritis yang efektif, Merdeka telah membangun Pengelolaan Risiko Kritis Merdeka (PERIKSA) yang merupakan proses verifikasi yang berbasis website dan aplikasi, bertujuan untuk mencegah kecelakaan fatal, dengan menerapkan upaya pengendalian pada 12 aktivitas dengan risiko kritis yaitu Manajemen Lalu Lintas, Standar Ban, Bekerja di Ketinggian, Isolasi, Pengangkatan, Ruang Terbatas, Kontak dengan Listrik, Bahan Kimia Berbahaya, Bekerja Dekat Air, Pembukaan Lahan, Geoteknik dan Peledakan.

Cara kerja verifikasi PERIKSA untuk mencegah kecelakaan serius dimulai dengan penerapan upaya pengendalian kritis oleh setiap karyawan yang melakukan pekerjaan yang termasuk dalam 12 aktivitas dengan risiko kritis. Supervisor kegiatan melakukan verifikasi fisik atas pelaksanaan kegiatan di lapangan dengan mengamati dan berdiskusi dengan pekerja yang melakukan kegiatan dengan risiko kritis tersebut. Supervisor tersebut kemudian memberikan konfirmasi bahwa pengendalian berjalan dengan efektif.

Apabila pengendalian tidak berjalan dengan efektif, supervisor memerintahkan agar kegiatan dihentikan. Kegiatan dapat dilanjutkan hanya jika tindakan perbaikan untuk memastikan pengendalian yang efektif telah dilaksanakan. Hasil verifikasi bahwa pengendalian kritis telah berjalan dengan efektif atau tindakan perbaikan telah dilaksanakan diverifikasi oleh manager terkait.

Secara berkala, untuk menjadikan verifikasi PERIKSA membudaya di Merdeka, Merdeka membagikan kepada semua karyawan berbagai cerita sukses bagaimana verifikasi PERIKSA oleh karyawan berhasil mengidentifikasi pengendalian kritis yang belum diterapkan sehingga berhasil mencegah kecelakaan kerja.

Critical Risk Management

The Critical Risk Management (CRM) System is a safety tool designed to prevent fatal or permanent injuries and illnesses by applying a consistent approach to selecting, defining, implementing, verifying, and evaluating critical controls to effectively reduce risk.

To enhance the effectiveness of its Critical Risk Management System, Merdeka has introduced PERIKSA (Merdeka Critical Risk Management), a digital verification platform accessible via web and mobile applications, which was designed to prevent fatal accidents. This system enforces critical controls across 12 high-risk activities: Traffic Management, Tire Standards, Working at Heights, Isolation, Lifting, Confined Spaces, Electrical Contact, Hazardous Chemicals, Working Near Water, Land Clearing, Geotechnics, and Blasting.

The PERIKSA verification process for preventing serious accidents starts with the implementation of critical controls by each employee performing tasks within the 12 high-risk activities. Activity supervisors then conduct on-site verification by observing the work and discussing it with the employees involved in these critical-risk tasks. The supervisor confirms whether the controls are functioning effectively.

If a control is found to be ineffective, the supervisor orders the work to stop. Activities may only resume once corrective actions have been implemented to ensure the controls are effective. The results of the verification whether the critical controls are effective or corrective actions have been completed are reviewed and confirmed by the relevant manager.

Periodically, to cultivate a culture of PERIKSA verification at Merdeka, the company shares success stories with all employees, highlighting how employee-led PERIKSA verifications have identified missing critical controls and successfully prevented workplace accidents.



▲ PERIKSA verification coaching program and success story

Selain aplikasi PERIKSA, Merdeka juga telah menyusun 12 Critical Risk Standards (CRS) atas 12 aktivitas dengan risiko kritis yang memberikan panduan kepada pekerja bagaimana mengenali aktivitas dengan risiko kritis dan bagaimana cara menerapkan pengendalian yang efektif atas risiko kritis tersebut.

Audit CRS telah dilakukan di sites Merdeka pada tahun 2025. Di Tambang Emas Tujuh Bukit, audit CRS dilakukan terhadap manajemen lalu lintas dan implementasi kamera deteksi operator fatigue, kegiatan peledak dan bahan peledakan, manajemen tanggap darurat, standar penggunaan ban, standar pengangkatan dan operasional eksplorasi dan audit standar bekerja di dalam ruang terbatas.

Sementara itu, di Tambang Tembaga Wetar, audit mencakup implementasi kamera deteksi fatigue dan manajemen lalu lintas, audit bekerja di dalam ruang terbatas, audit operasional eksplorasi, standar peledakan dan penggunaan bahan peledak dan manajemen tanggap darurat.

Di Tambang Nikel Konawe, audit yang dilakukan meliputi standar keselamatan pengangkatan, manajemen tanggap darurat, dan audit operasional eksplorasi. Selanjutnya, di Tambang Emas Pani, audit mencakup standar pekerjaan diketinggian, audit operasional eksplorasi (*geoscience*) dan audit standar keselamatan pengangkatan.

Sedangkan di Pabrik AIM, audit difokuskan pada audit penggunaan bahan kimia dan barang berbahaya, standar pekerjaan diketinggian, audit standar pengangkatan dan audit manajemen tanggap darurat.

Audit ini dilakukan sebagai bagian dari komitmen Merdeka untuk terus memperkuat implementasi prosedur kerja yang aman dan memastikan standar keselamatan diterapkan secara optimal di seluruh unit bisnis.

TAHAN (Tidak Aman, Hentikan, Laporkan, Amankan)^[403-2]^[14.16.3]

Sebagai bagian dari komitmen perusahaan dalam memperkuat budaya keselamatan kerja, perusahaan menerapkan program TAHAN (Tidak Aman, Hentikan, Laporkan, dan Amankan) sebagai mekanisme intervensi keselamatan yang mendorong partisipasi aktif seluruh pekerja dalam mencegah potensi kecelakaan.

Program ini memberikan kewenangan kepada setiap pekerja untuk melakukan intervensi langsung terhadap kondisi atau tindakan yang tidak aman, dengan menghentikan pekerjaan apabila ditemukan potensi bahaya yang dapat menimbulkan risiko terhadap pekerja, peralatan, maupun lingkungan.

Pendekatan ini menegaskan bahwa keselamatan merupakan tanggung jawab bersama dan menjadi prioritas utama dalam setiap aktivitas operasional.

In addition to the PERIKSA application, Merdeka has developed 12 Critical Risk Standards (CRS) for the 12 high-risk activities. These standards provide employees with guidance on how to identify activities with critical risks and how to implement effective controls to manage those risks.

A CRS audit was conducted at Merdeka sites in 2025. At Tujuh Bukit Gold Mine, CRS audits cover traffic management and the implementation of operator fatigue detection cameras, blasting activities and explosives handling, emergency response management, tire usage standards, lifting and exploration operations, and confined space work standards.

At Wetar Copper Mine, audits include the implementation of fatigue detection cameras and traffic management, confined space work, exploration operations, blasting and explosives handling standards, and emergency response management.

At Konawe Nickel Mine, audits focus on lifting safety standards, emergency response management, and exploration operations. At Pani Gold Mine, audits cover working at heights standards, exploration operations (*geoscience*), and lifting safety standards.

At the AIM Plant, audits are focused on chemical and hazardous material handling, working at heights standards, lifting standards, and emergency response management.

These audits are part of Merdeka's ongoing commitment to strengthen the implementation of safe work procedures and ensure that safety standards are applied consistently across all business units.

TAHAN Program (Unsafe, Stop, Report, Keep Safe)

As part of the Company's commitment to strengthening its occupational safety culture, the Company implements the TAHAN program (Unsafe, Stop, Report, and Make Safe) as a safety intervention mechanism that encourages the active participation of all workers in preventing potential accidents.

This program authorizes every worker to directly intervene in unsafe conditions or actions by stopping work when potential hazards are identified that may pose risks to workers, equipment, or the environment.

This approach emphasizes that safety is a shared responsibility and a top priority in all operational activities.

TAHAN dilaksanakan melalui empat tahapan utama, yaitu:

1. Tidak Aman – mengamati atau mengidentifikasi kondisi atau tindakan yang berpotensi menimbulkan bahaya di tempat kerja.
2. Hentikan – menghentikan sementara aktivitas kerja yang berisiko untuk mencegah terjadinya insiden.
3. Laporkan – menyampaikan temuan kepada pengawas atau fungsi keselamatan untuk dilakukan evaluasi dan tindak lanjut.
4. Amankan – memastikan bahwa pengendalian risiko telah diterapkan secara efektif sebelum pekerjaan dilanjutkan kembali.

Sebagai bagian dari proses pembelajaran dan peningkatan berkelanjutan, laporan TAHAN yang telah disampaikan selanjutnya dibahas kembali oleh supervisor dalam pre-job meeting atau briefing karyawan pada hari berikutnya untuk memastikan pembelajaran dari potensi bahaya tersebut dipahami serta menjadi langkah pencegahan bagi seluruh pekerja.

Melalui implementasi program TAHAN, perusahaan berupaya membangun budaya keselamatan yang proaktif, meningkatkan kepedulian terhadap risiko di tempat kerja, serta memperkuat sistem pengendalian bahaya sebagai bagian dari upaya mencapai operasi yang aman, andal, dan berkelanjutan. ^[2-24]

Manajemen Insiden

Merdeka memiliki Standar Manajemen Insiden yang merupakan panduan bagi entitas anak untuk mendefinisikan, mengomunikasikan dan mengelola insiden. Standar Manajemen Insiden Merdeka menjelaskan persyaratan untuk respon awal, penanggung jawab dan tingkat keparahan, pemberitahuan insiden, dan investigasi insiden.

Untuk mencegah terulangnya insiden yang berpotensi serius (SPI), Merdeka menyusun laporan M-Share SPI *lesson learned* yang menjelaskan rincian insiden, langkah koreksi dan tindakan pencegahan. Laporan lesson learned ini kemudian dikirimkan ke seluruh penanggung jawab K3 di seluruh entitas anak Perusahaan. Pelatihan dan evaluasi terkait insiden yang berpotensi serius selalu dilakukan evaluasi secara periodik untuk melihat efektifitas tindakan koreksi yang telah dilakukan serta meningkatkan praktik manajemen insiden. ^[403-5]

The TAHAN program is implemented through four main stages:

1. Unsafe – observing or identifying conditions or actions that may pose hazards in the workplace.
2. Stop – temporarily stopping risky work activities to prevent incidents from occurring.
3. Report – reporting the findings to supervisors or the safety function for evaluation and follow-up actions.
4. Make Safe – ensuring that risk control measures have been effectively implemented before work resumes

As part of the learning and continuous improvement process, reported TAHAN cases are reviewed by supervisors during pre-job meetings or employee briefings on the following day to ensure that lessons learned from the identified hazards are understood and applied as preventive measures by all workers.

Through the implementation of the TAHAN program, the Company aims to build a proactive safety culture, increase awareness of workplace risks, and strengthen hazard control systems as part of achieving safe, reliable, and sustainable operations.

Incident Management

Merdeka has established an Incident Management Standard to guide its subsidiaries in defining, communicating, and managing incidents. The standard specifies requirements for initial response, assignment of responsibilities and severity levels, incident notification, and incident investigation.

To prevent the recurrence of Serious Potential Incidents (SPI), Merdeka develops M-Share SPI lesson learned reports, which provide detailed accounts of incidents, corrective actions, and preventive measures. These reports are distributed to all safety personnel across the company's subsidiaries to ensure consistent application of lessons learned. Furthermore, regular training and evaluations are conducted to assess the effectiveness of corrective actions and enhance incident management practices.

Layanan Kesehatan Karyawan

Untuk menjaga kesehatan karyawan, Merdeka memastikan pelaksanaan pemeriksaan kesehatan awal, berkala, dan khusus sesuai dengan risiko kerja bagi seluruh karyawan. Dalam upaya mengidentifikasi dan mencegah potensi penyakit akibat kerja, Merdeka memberikan fasilitas *medical check-up* yang dilakukan secara berkala. Seluruh karyawan menjalani *medical check-up* setiap tahun. Merdeka memastikan bahwa informasi tentang kesehatan yang merupakan hak bagi setiap karyawan dijaga kerahasiaannya. [403-3] [403-6] [14.16.4] [14.16.7]

Sampai akhir tahun 2025, Merdeka telah melaksanakan *medical check-up* kepada 9.557 karyawan Merdeka dan 25.318 karyawan kontraktor. Berdasarkan hasil *medical check-up* tidak ditemukan kasus penyakit akibat kerja di BSI, Tambang Emas Pani, SCM, MTI, Tambang Tembaga Wetar. Merdeka telah memiliki *Medical Emergency Response Plan* (MERP) dan telah menandatangani kontrak dengan penyedia layanan medis untuk menyediakan evakuasi medis dan manajemen kesiapsiagaan darurat medis di seluruh sites Merdeka. [403-10] [14.16.11]

Selain itu, Merdeka menyediakan asuransi kesehatan bagi karyawan yang bekerja di kantor pusat dan karyawan unit usaha yang sedang cuti. Perusahaan juga menyelenggarakan edukasi kesehatan oleh tenaga dokter dan paramedis yang kompeten, mengadakan health talk untuk meningkatkan kesadaran mengenai pengelolaan kesehatan kerja, serta memberikan pelatihan dan seminar guna meningkatkan pengetahuan tentang fisik dan mental karyawan. [403-6]

Tenaga dan Fasilitas Kesehatan

Sampai tahun 2025, Kantor Pusat dan di seluruh site Merdeka telah dilengkapi dengan fasilitas klinik yang dilengkapi dengan tim dokter dan tenaga paramedic yang profesional, serta fasilitas seperti laboratorium dan apotik yang memadai. [F.21] [403-10]

Jumlah klinik dan layanan kesehatan di site Merdeka adalah sebagai berikut:

Keterangan Description	BSI	BKP/BTR	PANI	SCM	MTI
Jumlah klinik kesehatan Number of health clinics	1	1	2	1	0
Jumlah tenaga kesehatan Number of health workers	9	16	15	35	15

Employee Health Services

To safeguard employee health, Merdeka ensures that all employees undergo initial, periodic, and specialized health examinations based on their occupational risks. To identify and prevent potential work-related illnesses, Merdeka provides regular *medical check-up* for all employees, conducted annually. Merdeka also ensures that all employee health information, which is a fundamental right, is kept strictly confidential.

Until the end of 2025, Merdeka conducted *medical check-up* for 9,557 Merdeka employees and 25,318 contractor employees. The results of these *medical check-up* showed no cases of work-related illnesses at BSI, Pani Gold Mine, SCM, MTI, dan Wetar Copper Mine. Merdeka has established a *Medical Emergency Response Plan* (MERP) and has partnered with medical service providers to ensure medical evacuation and emergency medical preparedness across all Merdeka sites.

In addition, Merdeka provides health insurance for employees at the head office as well as for business unit employees on leave. The company also conducts health education sessions led by qualified doctors and paramedics, organizes health talks to raise awareness on occupational health management, and offers training and seminars to improve employees' physical and mental well-being.

Health Personnel and Facilities

As of 2025, the Head Office and all Merdeka sites are equipped with clinics staffed by professional doctors and paramedics, along with adequate facilities such as laboratories and pharmacies.

The number of clinics and healthcare services at Merdeka sites is as follows:

Merdeka Peringati Hari Kesehatan Nasional 2025: Wujudkan Hidup Sehat Masa Kini Merdeka Commemorates National Health Day 2025: Realizing a Healthy Life Today



Dalam rangka memperingati Hari Kesehatan Nasional (HKN) yang diperingati setiap tanggal 12 November, Merdeka menyelenggarakan berbagai kegiatan untuk meningkatkan kepedulian karyawan terhadap kesehatan melalui rangkaian aktivitas yang edukatif, inspiratif, dan menyenangkan.

Mengusung tema "Cek Kesehatan, Gaya Hidup Masa Kini, dan Kunci Sehat Menuju Masa Depan", seluruh rangkaian kegiatan dirancang selaras dengan kampanye nasional #AyoSehat sebagai wujud komitmen Merdeka dalam mendorong penerapan gaya hidup sehat di lingkungan kerja.

Kegiatan pertama dimulai dengan program Donor Darah untuk pejuang kanker yang dilaksanakan pada Kamis, 6 November 2025, di kantor pusat Merdeka. Bekerja sama dengan RS Kanker Dharmais dan Yayasan Kanker Anak Indonesia (YKAI), kegiatan ini memperoleh dukungan tinggi dari para karyawan dan berhasil mengumpulkan 96 kantong darah dari total 113 karyawan yang mendaftar.

Kontribusi ini menjadi bukti nyata kepedulian insan Merdeka terhadap para pejuang kanker yang membutuhkan transfusi darah untuk melanjutkan proses pengobatan dan pemulihan mereka.

In celebration of National Health Day (HKN), observed annually on November 12, Merdeka organized a series of activities to raise employee awareness of health through educational, inspiring, and enjoyable programs.

With the theme "Health Check-ups, Modern Lifestyles, and the Key to a Healthy Future," all activities were aligned with the national #AyoSehat campaign, demonstrating Merdeka's commitment to promoting healthy lifestyle practices in the workplace.

The first activity kicked off with a Blood Donation program for cancer patients, held on Thursday, November 6, 2025, at Merdeka's Head Office. In collaboration with Dharmais Cancer Hospital and the Indonesian Child Cancer Foundation (YKAI), the program received strong support from employees, collecting 96 bags of blood from 113 registered participants.

This contribution is a tangible demonstration of Merdeka employees' care and support for cancer patients who rely on blood transfusions to continue their treatment and recovery.

Kemudian, pada 12 November 2025, diselenggarakan Health Talk Show di kantor pusat Merdeka dengan tema "Kenali Sebelum Terlambat: Deteksi Dini Kanker Itu Gaya Hidup Masa Kini." Talk show ini menghadirkan pemaparan medis dari Rumah Sakit Brawijaya, serta kisah inspiratif dari dua pejuang kanker. Para narasumber mengajak peserta untuk memahami pentingnya deteksi dini, pemeriksaan kesehatan berkala, pengelolaan stres, serta penerapan gaya hidup sehat sebagai bentuk investasi masa depan dan wujud cinta diri.

Sesi tanya jawab berlangsung interaktif dan membuat para peserta semakin sadar bahwa menjaga kesehatan adalah keputusan yang harus dimulai sejak dini. Acara ditutup dengan pemeriksaan kesehatan untuk asam urat dan kadar gula gratis dari Rumah Sakit Brawijaya.

Subsequently, on November 12, 2025, a Health Talk Show was held at Merdeka's head office under the theme "Recognize Before It's Too Late: Early Cancer Detection Is a Modern Lifestyle." The talk show featured a medical presentation by Brawijaya Hospital and inspiring stories from two cancer survivors. The speakers encouraged participants to recognize the importance of early detection, regular health check-ups, stress management, and adopting a healthy lifestyle as an investment in the future and an act of self-care.

The interactive Q&A session further heightened participants' awareness that maintaining health is a decision that should begin early. The event concluded with free screenings for uric acid and blood sugar levels, provided by Brawijaya Hospital.



Sebagai penutup rangkaian HKN 2025, Merdeka menggelar Fun Sport Day with Management Team & Senior Leaders pada Kamis, 20 November 2025, di Spincity Bowling, Agora Mall Thamrin, Jakarta Pusat. Kegiatan ini berlangsung seru dan meriah, menghadirkan suasana penuh tawa, semangat, dan sportivitas melibatkan beberapa Merdeka Group Leaders dan karyawan kantor pusat Merdeka. Acara ini bukan hanya menjadi aktivitas olahraga, tetapi juga wadah kebersamaan yang mempererat hubungan antara karyawan dengan para pemimpin Merdeka dalam suasana yang akrab dan menyenangkan.

As the closing event of National Health Day 2025, Merdeka held a Fun Sport Day with the Management Team and Senior Leaders on Thursday, November 20, 2025, at Spincity Bowling, Agora Mall Thamrin, Central Jakarta. The event was lively and enjoyable, filled with laughter, energy, and sportsmanship, and involved several Merdeka Group Leaders along with head office employees. The activity was not only a sporting event but also a platform for togetherness, fostering stronger bonds between employees and Merdeka leaders in a friendly and engaging atmosphere.



Tambang Emas PT BSI Raih Penghargaan Zero Accident PT BSI Gold Mine Receives Zero Accident Award

PT Bumi Suksesindo (PT BSI), anak usaha PT Merdeka Copper Gold Tbk, menunjukkan kinerja Keselamatan dan Kesehatan Kerja (K3) yang konsisten melalui penerapan sistem keselamatan pertambangan yang terencana dan berkelanjutan. Sepanjang tahun 2024 hingga awal 2025, perusahaan menjalankan berbagai program pengendalian risiko, penguatan budaya keselamatan, serta peningkatan kapasitas tenaga kerja di seluruh area operasional Tambang Emas Tujuh Bukit, Banyuwangi. Upaya ini mencakup pelatihan K3 rutin, inspeksi keselamatan, pengawasan kepatuhan prosedur kerja aman, serta penguatan peran pimpinan lini dalam pengelolaan risiko. Program K3 ini ditujukan untuk melindungi seluruh pekerja dan kontraktor, sekaligus meminimalkan potensi dampak keselamatan terhadap masyarakat di sekitar area operasi.

Sebagai hasil dari implementasi tersebut, PT BSI memperoleh Penghargaan Zero Accident dari Pemerintah Provinsi Jawa Timur pada Februari 2025, berdasarkan evaluasi kinerja keselamatan selama satu tahun tanpa kejadian kecelakaan kerja fatal. Capaian ini mencerminkan peningkatan tingkat kematangan keselamatan perusahaan yang telah berada pada level *Compliant/Planned*, di mana pengelolaan K3 dilakukan secara sistematis dan terintegrasi dalam proses operasional. Penerima manfaat utama dari program ini adalah karyawan dan kontraktor yang bekerja di area tambang, yang merasakan peningkatan perlindungan keselamatan, kepastian kerja yang lebih aman, serta lingkungan kerja yang lebih terkendali risikonya.

Kinerja K3 yang positif ini juga memberikan dampak tidak langsung bagi masyarakat sekitar melalui operasional yang lebih stabil dan produktif, serta berkurangnya potensi insiden yang dapat menimbulkan dampak lingkungan maupun sosial. Dengan menempatkan keselamatan sebagai prioritas utama, PT BSI berupaya memastikan keberlanjutan operasional jangka panjang sekaligus mendukung kesejahteraan tenaga kerja dan komunitas lokal. Pendekatan ini sejalan dengan komitmen perusahaan terhadap praktik pertambangan yang bertanggung jawab dan kontribusi nyata terhadap pembangunan berkelanjutan.

PT Bumi Suksesindo (PT BSI), a subsidiary of PT Merdeka Copper Gold Tbk, has consistently demonstrated strong Occupational Health and Safety (OHS) performance through the implementation of a well-planned and sustainable mining safety system. From 2024 through early 2025, the company carried out various risk control programs, initiatives to strengthen the safety culture, and workforce capacity-building across all operational areas of the Tujuh Bukit Gold Mine in Banyuwangi. These efforts included regular OHS training, safety inspections, monitoring compliance with safe work procedures, and reinforcing the role of line management in risk oversight. The OHS programs aim to protect all employees and contractors while minimizing potential safety impacts on the communities surrounding the operational areas.

As a result of these efforts, PT BSI was awarded the Zero Accident Award by the East Java Provincial Government in February 2025, recognizing a year of safety performance without any fatal work-related accidents. This achievement reflects the company's improved Safety Maturity Level, reaching the *Compliant/Planned* stage, where OHS management is systematically implemented and fully integrated into operational processes. The primary beneficiaries of this program are employees and contractors working in the mine area, who enjoy enhanced safety protection, greater job security, and a more controlled, risk-managed working environment.

This strong OHS performance also delivers indirect benefits to surrounding communities by ensuring more stable and productive operations, while reducing the likelihood of incidents that could have environmental or social impacts. By placing safety as a top priority, PT BSI aims to secure long-term operational sustainability while supporting the well-being of both its workforce and local communities. This approach reflects the company's commitment to responsible mining practices and its tangible contribution to sustainable development.



MENINGKATKAN BUDAYA K3

Konsultasi dan Partisipasi [403-4][403-7][14.16.5][14.16.8]

Komunikasi yang efektif merupakan bagian yang sangat penting dari program K3 di Merdeka. Di Merdeka, KTT atau General Manager dari setiap entitas anak memiliki tanggung jawab untuk memastikan keterlibatan seluruh karyawan dan kontraktor dalam komunikasi serta partisipasi yang berkaitan dengan K3.

Merdeka mendorong setiap karyawan untuk secara aktif melaporkan pekerjaan dan lingkungan kerja yang dianggap berbahaya. Karyawan dapat melaporkan potensi pekerjaan yang berbahaya kepada atasan langsung atau kepada Komite K3 yang telah dibentuk oleh Merdeka di setiap entitas anak dan kantor pusat di Jakarta. Komite ini dibentuk sesuai dengan peraturan pemerintah yang berlaku dan terdiri dari Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) serta Komite Keselamatan Pertambangan (KKP). Anggota komite berasal dari berbagai departemen dalam Perusahaan, dengan Kepala Teknik Tambang sebagai ketua. KKP bertanggung jawab untuk memastikan pelaksanaan K3 sesuai dengan peraturan yang berlaku, termasuk menerima dan menindaklanjuti laporan dari karyawan terkait dengan potensi pekerjaan atau kondisi yang berbahaya.

Merdeka memiliki komitmen untuk memberikan perlindungan kepada karyawan yang melaporkan potensi pekerjaan atau lingkungan kerja yang dianggap berbahaya dan memastikan bahwa karyawan tidak akan mendapatkan sanksi atau tindakan pembalasan dari pihak yang dilaporkan. [403-4]

Forum/Program	Deskripsi Descriptions
Induksi Induction	Sebelum memulai bekerja, karyawan baru akan mendapatkan informasi awal tentang Kesehatan, Keselamatan, dan Lingkungan (HSE), kebijakan Perusahaan, serta prosedur kerja di departemen masing-masing. New employees receive an introduction to Health, Safety, and Environment (HSE), company policies, and departmental work procedures before starting work.
Pelatihan HSE, Keterampilan, dan Penilaian Kompetensi HSE Training, Skills, and Competency Assessment	Karyawan akan diberikan pelatihan tentang Kesehatan, Keselamatan, dan Lingkungan (HSE) serta keterampilan kerja yang diperlukan untuk melaksanakan tugas mereka dengan aman. Perusahaan akan menyediakan waktu khusus bagi karyawan untuk mengikuti pelatihan ini. Employees undergo HSE training and are assessed on their work skills to ensure they can perform their tasks safely. Specific time is allocated for this training.
Matriks Kompetensi Competency Matrix	Matriks ini berfungsi sebagai panduan untuk mengidentifikasi kompetensi yang dibutuhkan bagi setiap karyawan agar dapat menjalankan tugasnya secara efektif. A guide to identify the competencies each employee needs to perform their duties effectively.
Komite HSE HSE Committee	Forum HSE dirancang sebagai wadah bagi seluruh pemangku kepentingan untuk berdiskusi mengenai isu-isu Kesehatan, Keselamatan, dan Lingkungan Kerja (K3) yang muncul di tempat kerja. Partisipasi aktif dari perwakilan karyawan dan kontraktor sangat diperlukan dalam setiap rapat Komite HSE. A forum where stakeholders discuss emerging HSE issues in the workplace. Active participation from employee and contractor representatives is essential.
Program Penghargaan Award Program	Program ini bertujuan untuk memberikan penghargaan kepada karyawan yang berprestasi dalam bidang Keselamatan dan Kesehatan Kerja. This program recognizes employees who excel in occupational health and safety.
Manajemen Perubahan Change Management	Proses ini bertujuan untuk mengidentifikasi dan mengevaluasi potensi dampak dari perubahan yang direncanakan. Hal ini mencakup konsultasi dengan pihak-pihak yang akan terpengaruh oleh perubahan tersebut. A process to identify and evaluate the potential impacts of planned changes, including consultations with affected parties.

ENHANCING OHS CULTURE

Consultation and Participation

Effective communication is a vital component of Merdeka's OHS program. At Merdeka, the Head of Technical Mining or General Manager of each subsidiary is responsible for ensuring that all employees and contractors are actively involved in OHS-related communication and participation.

Merdeka encourages all employees to actively report any work tasks or workplace conditions they perceive as hazardous. Employees can report potential hazards to their immediate supervisors or to the OHS Committee established by Merdeka at each subsidiary and at the Head Office in Jakarta. The committee is formed in accordance with applicable government regulations and comprises the Occupational Health and Safety Advisory Committee and the Mining Safety Committee. Members come from various departments within the company, with the Head of Mining Engineering serving as chair. The Mining Safety Committee is responsible for ensuring OHS implementation in compliance with regulations, including receiving and addressing reports from employees regarding potentially hazardous tasks or conditions.

Merdeka is committed to protecting employees who report work tasks or workplace conditions they perceive as hazardous, ensuring that they will not face any sanctions or retaliation from the parties being reported.

Forum/Program	Deskripsi Descriptions
Pengarahan sebelum bekerja atau <i>Toolbox Talk</i> dan <i>safety talk</i> Pre-Work Briefing/ Toolbox Talk and Safety Talk	Forum komunikasi di tempat kerja yang memberikan kesempatan untuk konsultasi dan partisipasi dengan manajemen lini terkait kegiatan kerja dan topik HSE. Pertemuan keselamatan rutin harus dilakukan dengan melibatkan karyawan, dengan frekuensi sebagai berikut: > Sekali per <i>shift</i> untuk operasi. > Sekali per minggu untuk kantor operasional. > Sekali per bulan untuk kantor. Karyawan harus didorong untuk memberikan umpan balik tentang permasalahan terkait HSE dalam forum rapat keselamatan tersebut. These forums offer opportunities for consultation and participation regarding work activities and HSE topics. Safety meetings are held regularly, with the following frequency: > Once per shift for operations. > Once a week for operational offices. > Once a month for the head office. Employees are encouraged to provide feedback on HSE-related issues during these meetings.
Buletin, Poster, Papan Informasi, dan Peringatan Posters, Bulletin Boards, and Warnings	Materi promosi dan informasi ini bertujuan untuk meningkatkan kesadaran karyawan mengenai isu-isu Kesehatan, Keselamatan, dan Lingkungan (HSE). Materi yang disajikan mencakup kinerja HSE terkini, berita terbaru, identifikasi bahaya, pembelajaran dari kejadian sebelumnya, serta isu-isu kritis yang perlu ditangani. Promotional and informational materials are used to raise awareness about HSE issues. These materials include current HSE performance updates, news, hazard identification, lessons learned from past incidents, and critical issues that need to be addressed.
TAHAN	Prosedur ini mengharuskan pekerja untuk menghentikan pekerjaan jika ditemukan adanya tindakan atau kondisi yang dapat membahayakan keselamatan pekerja atau aset Perusahaan. This procedure requires workers to stop work if they observe unsafe actions or conditions that could endanger worker safety or company assets.
Laporan Bahaya Hazard Report	Sebuah proses untuk melaporkan setiap bahaya yang diamati, yang tidak dapat diperbaiki segera. A process for reporting hazards that cannot be immediately corrected.
Penilaian pra-pekerjaan Pre-Work Assessment	Merupakan sebuah daftar periksa yang harus diisi oleh karyawan pelaksana pekerjaan atau pengawas sebelum memulai pekerjaan. Daftar ini mencakup pemeriksaan terhadap JSEA atau SOP, alat dan peralatan, lingkungan kerja, dan kompetensi orang-orang yang terlibat. This checklist must be completed by workers or supervisors before beginning work. It includes verifying the Job Safety Analysis (JSEA) or Standard Operating Procedure (SOP), checking tools and equipment, assessing the work environment, and confirming the competence of those involved.
Manajemen Kelelahan Fatigue Management	Sebuah program yang terutama ditujukan untuk operator dan pengemudi untuk mendorong karyawan yang lelah untuk melaporkan kondisinya kepada Pengawas, yang juga melibatkan pelaporan kesiapan kerja (<i>fit to work</i>). A program targeted at operators and drivers, encouraging them to report if they feel fatigued or unfit to work.
JSEA/Penilaian Risiko Tempat Kerja/SOP JSEA/Workplace Risk Assessment/SOP	Proses untuk mendokumentasikan langkah-langkah yang terlibat dalam menyelesaikan pekerjaan dengan aman, dengan konsultasi dan partisipasi dari mereka yang terlibat atau yang memiliki pengetahuan tentang pekerjaan tersebut. A process to document the steps for safely completing tasks, with input and consultation from those involved or knowledgeable about the task.
Manajemen Risiko Kritis (CRM) Critical Risk Management (CRM)	Sebuah program untuk semua tingkatan untuk melakukan verifikasi Pengendalian Risiko Kritis guna memastikan bahwa semua kontrol telah diterapkan dan diimplementasikan secara efektif sebelum dan selama aktivitas risiko kritis. A program to verify Critical Risk Controls at all levels, ensuring that all necessary controls are in place and effective before and during critical risk activities.
Program Kesehatan Kerja Occupational Health Program	Berpartisipasi aktif dalam program kesehatan kerja yang meliputi kegiatan fisik, pemantauan kondisi lingkungan kerja, dan kampanye edukasi kesehatan. Active participation in programs promoting occupational health, including physical activities, monitoring work environment conditions, and health education campaigns.

Merdeka – SIAP

Merdeka *Sustainability Information and Improvement Awareness Program* (M-SIAP) adalah media komunikasi yang mendukung Program Informasi dan Peningkatan Kesadaran terkait aspek keberlanjutan, termasuk aspek Kesehatan dan Keselamatan Kerja (K3). Media komunikasi mencakup komunikasi melalui video, poster, atau spanduk dengan tema atau topik yang relevan dengan K3, yang dapat dipasang di lokasi-lokasi strategis untuk meningkatkan efektivitas penyampaian pesan.



▲ OHS awareness campaigns

Pelatihan K3

Untuk memastikan karyawan dapat menjalankan pekerjaan dengan aman, Merdeka melakukan Pelatihan K3 kepada karyawan dan kontraktor secara berkelanjutan. Pada tahun 2025, Merdeka memastikan seluruh entitas anak telah menyelenggarakan program penyegaran dan peningkatan kesadaran terkait K3 kepada seluruh karyawan, mitra kerja, dan kontraktor.

Tujuan dari program ini adalah untuk mengomunikasikan informasi mengenai kecelakaan serius beserta pembelajaran yang dapat diambil dari kejadian tersebut, mengulang kembali materi induksi atau prosedur K3 yang berlaku, serta mengomunikasikan risiko, pengendalian, atau program K3 yang baru. [403-5][14.16.6]

Merdeka – SIAP

The Merdeka Sustainability Information & Improvement Awareness Program (M-SIAP) is a communication platform that supports the Information and Awareness Enhancement Program on sustainability aspects, including Occupational Health and Safety (OHS). The communication materials include videos, posters, and banners with themes or topics relevant to OHS, which can be displayed in strategic locations to maximize the effectiveness of message delivery.

Occupational Health and Safety Training

To ensure employees perform their work safely, Merdeka provides continuous OHS training for both employees and contractors. In 2025, Merdeka ensured that all subsidiaries conducted refresher courses and awareness programs on OHS for all employees, partners, and contractors.

The purpose of this program is to communicate information about serious accidents and the lessons learned from them, to reinforce induction materials or applicable OHS procedures, and to convey information on new risks, controls, or OHS programs.

Materi pelatihan yang diberikan kepada karyawan dan kontraktor meliputi Pelatihan Internal dan Eksternal. Pada Pelatihan Internal, diawali dengan program induksi yang mencakup *Annual Refresh Induction, General Safety Induction, Processing Induction, Mining Induction*, dan *Geoscience Induction*. Dalam aspek manajemen risiko, perusahaan menyelenggarakan pelatihan *Baseline Risk & Opportunity Assessment (BROA), PERIKSA (Pengelolaan Risiko Kritis), Risk and Opportunity Management (ROM)*, serta implementasi sistem keselamatan *M-Safe*.

Selain itu, pelatihan ICAM Investigation (internal). Penguatan kompetensi tanggap darurat melalui pelatihan Alat Pemadam Api Ringan (APAR), *Basic Fire Fighting, Fire Warden, First Aid, ERT Volunteer Training, Hearing Protection & Respiratory Training*, serta OHS Refresher Day. Perusahaan juga memberikan pelatihan teknis dan operasional seperti *CRS Lifting Operation Training, Basic Safety Rigging, Prepare and Operate Tag Line on Height Lifting, Safely Use Power Tools, Spotter, Isolation Officer*, serta *Isolation Lock Out & Tag Out (LOTO)*.

Untuk pekerjaan berisiko tinggi, tersedia pelatihan *Confined Space, Working at Height, Working On/In/Near Water* termasuk *Awareness of Sea Survival*, serta *Defensive Driving Training* bagi pemegang Surat Izin Mengemudi Perusahaan (SIMPER). Dalam mendukung aspek lingkungan, pelatihan Pengelolaan Limbah B3, dan *Hazard Awareness* turut diberikan guna memastikan pengelolaan dampak operasional terhadap lingkungan dilakukan sesuai standar dan regulasi yang berlaku. Program Pengawas Operasional Pertama (POP) Refresher and Mentorship juga dilaksanakan untuk memperkuat kompetensi pengawas operasional dalam menjalankan praktik kerja yang aman dan bertanggung jawab.

Pelatihan Eksternal, dalam bidang operasional alat dan pesawat angkat angkut, perusahaan memfasilitasi sertifikasi operator Forklift, Manlift, Sabuk Berjalan, Overhead Crane kelas 3, serta Reach Stacker kelas 1. Selain itu, sertifikasi Teknisi K3 Perancah dan Supervisor K3 Perancah diberikan untuk memastikan pekerjaan di area konstruksi dan instalasi dilakukan sesuai standar keselamatan kerja yang berlaku.

Pada aspek keselamatan dan kesehatan kerja (K3), perusahaan mendorong peningkatan kompetensi melalui sertifikasi AK3 Listrik, Ahli K3 Umum, Ahli K3 Muda Lingkungan Kerja, serta Ahli Higiene Industri Madya (BNSP).

Untuk memperkuat kesiapsiagaan medis di lokasi kerja, perusahaan juga mendukung sertifikasi *Advanced Cardiac Life Support (ACLS)* dan *Advanced Trauma Life Support (ATLS)*. Dalam mendukung tata kelola lingkungan yang baik, perusahaan melaksanakan pelatihan terkait Peraturan Perundangan Lingkungan Hidup, Sertifikasi Pengambil Contoh Uji Air, serta sertifikasi Perencana dan Pelaksana Reklamasi pada Kegiatan Pertambangan. Langkah ini memastikan pengelolaan dampak lingkungan dilakukan secara terukur dan sesuai ketentuan yang berlaku. Penguatan kompetensi pengawas operasional tambang juga dilakukan melalui sertifikasi POP dan Pengawas Operasional Madya (POM).

The training provided to employees and contractors includes both Internal and External programs. Internal Training begins with induction programs, including *Annual Refresh Induction, General Safety Induction, Processing Induction, Mining Induction*, and *Geoscience Induction*. For risk management, the company provides training on *Baseline Risk & Opportunity Assessment (BROA), PERIKSA (Critical Risk Management), Risk and Opportunity Management (ROM)*, and the implementation of the *M-Safe* safety system.

In addition, internal ICAM Investigation training is provided. Emergency response competencies are reinforced through training in Fire Extinguisher (APAR) use, *Basic Fire Fighting, Fire Warden, First Aid, ERT Volunteer Training, Hearing Protection & Respiratory Training*, and OHS Refresher Day. The company also provides technical and operational training, including *CRS Lifting Operation, Basic Safety Rigging, Preparing and Operating Tag Lines for Height Lifting, Safe Use of Power Tools, Spotter, Isolation Officer, and Lock Out & Tag Out (LOTO)*.

For high-risk work, training is offered in *Confined Space, Working at Height, Working On/In/Near Water*, including *Awareness of Sea Survival*, and *Defensive Driving* for Company Driving Permit (SIMPER) holders. To support environmental management, training is also provided in *Hazardous Waste Management, and Hazard Awareness* to ensure operational impacts on the environment are managed in accordance with applicable standards and regulations. Additionally, the *First-line Operational Supervisor (POP) Refresher and Mentorship* program is conducted to strengthen the competencies of operational supervisors in implementing safe and responsible work practices.

In the area of operational equipment and lifting machinery, the company provides certification for operators of Forklifts, Manlifts, Conveyor Belts, Class 3 Overhead Cranes, and Class 1 Reach Stackers. Additionally, certifications are offered for *Scaffold OHS Technicians and Scaffold OHS Supervisors* to ensure that work in construction and installation areas is conducted in accordance with applicable safety standards.

In terms of Occupational Health and Safety (OHS), the company fosters competency development through certifications such as *Electrical AK3, General OHS Expert, Junior Workplace OHS Expert, and Intermediate Industrial Hygiene Expert (BNSP)*.

To strengthen medical preparedness at work sites, the company also supports certifications in *Advanced Cardiac Life Support (ACLS)* and *Advanced Trauma Life Support (ATLS)*. In support of sound environmental governance, the company provides training on *Environmental Legislation, Water Sampling Certification, and Reclamation Planning and Implementation Certification* for mining activities. These initiatives ensure that environmental impacts are managed in a controlled and compliant manner. The competencies of operational supervisors are further enhanced through *POP and Intermediate Operational Supervisor (POM) certifications*.

Kami telah memberikan pelatihan K3 kepada 1.987 karyawan dengan total 34.500 jam pelatihan dan pelatihan K3 kepada 2.635 karyawan kontraktor dengan total 39.348 jam pelatihan.

We have provided OHS training to 1,987 employees, totaling 34,500 hours, and to 2,635 contractor employees, totaling 39,348 hours.

Selain itu, perusahaan menyelenggarakan pelatihan Defensive Driving eksternal untuk meningkatkan keselamatan transportasi operasional. Pada aspek sistem manajemen dan tata kelola, karyawan mengikuti pelatihan Awareness dan Internal Auditor ISO 14001:2015 serta ISO 45001:2018 guna memastikan implementasi sistem manajemen lingkungan dan keselamatan kerja berjalan efektif dan terintegrasi. Perusahaan juga memberikan pelatihan *Awareness of Food Defense & Food Fraud* sebagai bagian dari penguatan kontrol keamanan rantai pasok. Melalui berbagai program pelatihan dan sertifikasi eksternal tersebut, perusahaan memastikan bahwa kompetensi sumber daya manusia terus berkembang sejalan dengan tuntutan regulasi, standar industri, dan komitmen terhadap kinerja ESG yang berkelanjutan.



Manajemen Tanggap Darurat

Merdeka memiliki *Emergency Response Preparedness Standard* yang dirancang untuk membantu entitas anak dalam pengembangan program kesiapsiagaan dan tanggapan darurat di tempat kerja. Standar ini mencakup tata cara pelaksanaan rencana tanggap darurat, termasuk dokumentasi, prosedur tanggap darurat, serta sumber daya manusia yang dibutuhkan untuk memastikan respons yang cepat dan efektif terhadap berbagai situasi darurat.

Sebagai bagian dari standar ini, Merdeka menerapkan *Crisis and Emergency Response Plan* yang berfungsi untuk menetapkan peran dan tanggung jawab dalam *Crisis Management Team*. Tujuan utama dari rencana ini adalah memastikan *Crisis Management Team* dapat merespons dan mengelola situasi krisis dengan efektif, terutama yang berpotensi memberikan dampak negatif terhadap berbagai aspek perusahaan.

Panduan ini menekankan peran utama *Crisis Management Team* dalam memberikan dukungan dan arah strategis kepada *Emergency Response Team* selama penanganan krisis. Tugas utama *Crisis Management Team* adalah menangani krisis yang berkaitan dengan risiko material yang dihadapi oleh Merdeka. Tim ini bertanggung jawab dalam mengidentifikasi, menganalisis, dan merespons secara efisien terhadap situasi krisis yang dapat berdampak pada karyawan, aset, operasi perusahaan, lingkungan, reputasi, dan tujuan bisnis Merdeka.

Crisis and Emergency Response Plan juga mengatur tugas *Crisis Management Team* dalam mengelola ancaman aktual

In addition, the company conducts external Defensive Driving training to enhance operational transportation safety. Regarding management systems and governance, employees participate in Awareness and Internal Auditor training for ISO 14001:2015 and ISO 45001:2018, ensuring the effective and integrated implementation of environmental and occupational health and safety management systems. The company also provides training on Food Defense & Food Fraud Awareness to strengthen supply chain security controls. Through these various external training and certification programs, the company ensures that employee competencies continue to develop in line with regulatory requirements, industry standards, and its commitment to sustainable ESG performance.



Emergency Response Management

Merdeka has established an Emergency Response Preparedness Standard to guide its subsidiaries in developing comprehensive workplace emergency preparedness and response programs. This standard details the implementation procedures for emergency response plans, covering documentation, response protocols, and the necessary personnel to ensure a swift and effective reaction to various emergency scenarios.

As part of this framework, Merdeka implements the Crisis and Emergency Response Plan, which defines the roles and responsibilities within the Crisis Management Team. The primary objective of this plan is to equip the Crisis Management Team with the capability to respond to and manage crises that may impact different aspects of the company.

A key component of this plan is the Crisis Management Team's role in providing strategic direction and support to the Emergency Response Team. The team is tasked with handling crises related to material risks faced by Merdeka, ensuring an efficient response to situations that could affect employees, company assets, operations, the environment, corporate reputation, and overall business objectives.

Additionally, the Crisis and Emergency Response Plan outlines the Crisis Management Team's responsibilities in addressing

atau potensial yang dapat memengaruhi kemampuan Merdeka dalam menjalankan bisnis jangka panjang. Tugas ini mencakup penanganan dampak potensial terhadap operasional, reputasi perusahaan, dan kewajiban hukum. Dalam implementasinya, prioritas utama adalah menerapkan langkah-langkah yang diperlukan untuk meminimalkan kerugian dan mengurangi risiko dalam konteks manajemen krisis dan darurat.

Site General Manager dan KTT memiliki tanggung jawab utama dalam memastikan pelaksanaan prosedur di area operasional Merdeka berjalan efektif. HSE *Representatives* memberikan panduan terkait kesehatan, keselamatan kerja, dan aspek lingkungan kepada *Emergency Management Team (EMT)*. Sementara itu, *Head of Department* bertanggung jawab dalam mengawasi kesiapsiagaan dan mobilisasi personil.

Crisis Management Team Leader memimpin *Crisis Management Team* dalam menghadapi situasi krisis dengan dukungan koordinatif dari GM/KTT/*Emergency Management Team Leader* yang bertanggung jawab penuh atas keseluruhan proses tanggap darurat. *Field Emergency Response Team Leader* bertugas memberikan pembaruan berkala kepada *Emergency Management Team Leader*, sementara anggota tim bertindak sebagai responden awal sesuai dengan petunjuk yang telah ditetapkan.

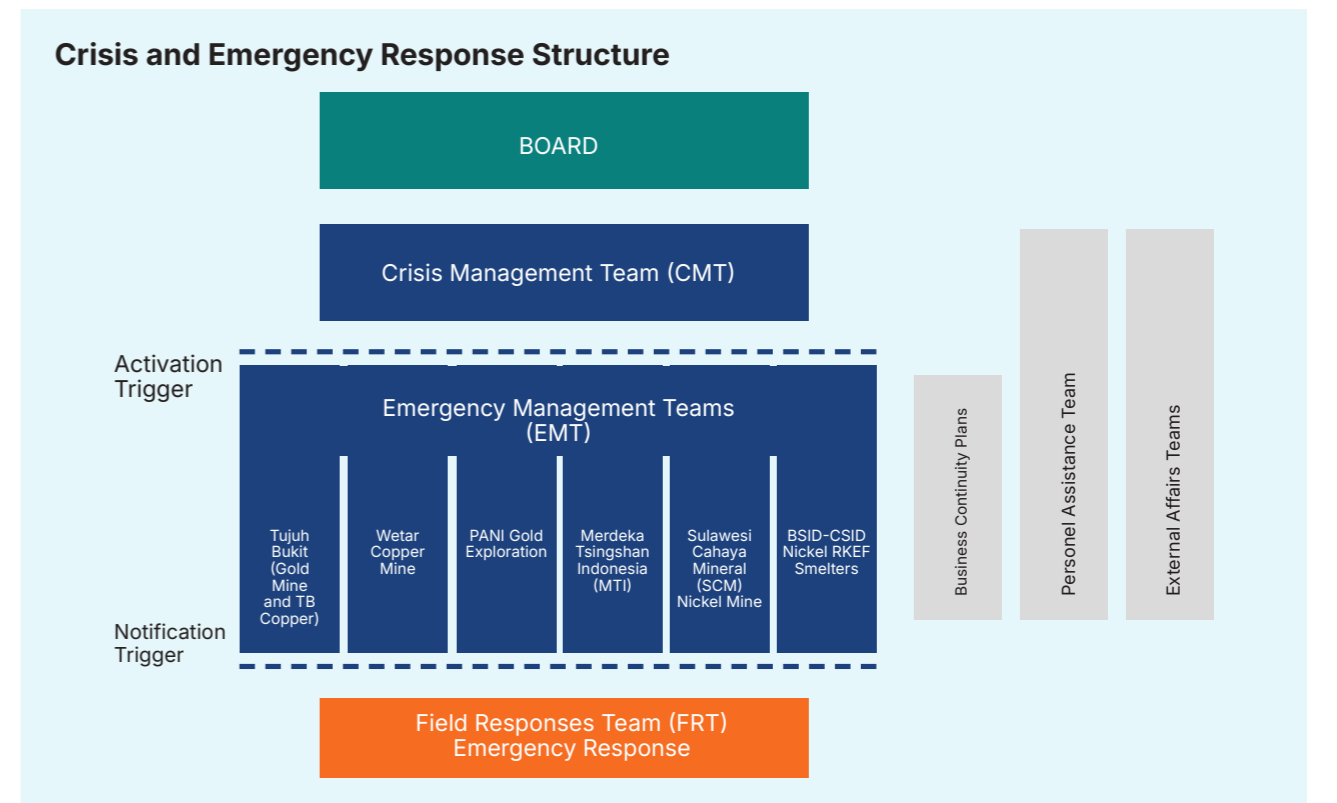
Struktur tim ini dirancang untuk menciptakan kerangka kerja yang efisien dalam menangani dan mengelola situasi darurat. Dengan koordinasi yang jelas antarperan, perusahaan dapat merespons insiden dengan lebih cepat dan efektif, serta mengurangi potensi dampak negatif terhadap operasional dan keberlanjutan bisnis.

actual or potential threats that may impact Merdeka's long-term operational viability. This includes mitigating risks to operations, corporate reputation, and legal compliance. The overarching priority is to implement necessary measures that minimize losses and enhance resilience in crisis situations.

The Site General Manager & Head of Technical Mining (KTT) is responsible for ensuring the effective execution of emergency procedures across Merdeka's operational sites. HSE Representatives provide guidance on occupational health, safety, and environmental aspects to the Emergency Management Team (EMT), while Head of Departments oversee preparedness efforts and personnel mobilization.

The Crisis Management Team Leader spearheads crisis response efforts, supported by the GM/KTT/*Emergency Management Team Leader*, who holds full responsibility for managing the emergency response process. The Field Emergency Response Team Leader ensures timely updates to the Emergency Management Team Leader, while designated team members serve as first responders, acting in accordance with established protocols.

This structured approach enhances Merdeka's ability to manage and mitigate emergency situations effectively. By ensuring clear role coordination, the company can respond swiftly to incidents, minimizing potential disruptions and safeguarding business continuity.



The First Merdeka Rescue Challenge (MER-C)



PT Merdeka Copper Gold menyelenggarakan *Merdeka Emergency Rescue Challenge (MER-C)* perdana pada 11-17 Agustus 2025 di Tujuh Bukit Operations, PT Bumi Suksesindo (BSI). Kegiatan ini diikuti oleh tim tanggap darurat dari enam entitas anak, yaitu PT Bumisukses Indo sebagai tuan rumah, PT Batutua Kharisma Permai, PT Batutua Tembaga Raya, PT Pani Bersama Jaya, PT Merdeka Battery Materials, dan PT Merdeka Tsingshan Indonesia. MER-C dirancang sebagai sarana peningkatan kapasitas dan standardisasi kompetensi tim tanggap darurat di seluruh wilayah operasi Grup Merdeka.

PT Merdeka Copper Gold held its inaugural *Merdeka Emergency Rescue Challenge (MER-C)* from August 11-17, 2025, at the Tujuh Bukit Operations of PT Bumi Suksesindo (BSI). The event brought together emergency response teams from six subsidiaries, including PT Bumisukses Indo as the host, PT Batutua Kharisma Permai, PT Batutua Tembaga Raya, PT Pani Bersama Jaya, PT Merdeka Battery Materials, and PT Merdeka Tsingshan Indonesia. MER-C was designed as a platform to strengthen capacity and standardize the competencies of emergency response teams across all Merdeka Group operational areas.



Selama pelaksanaan kegiatan, setiap *Emergency Rescue Team (ERT)* mengikuti rangkaian kompetisi dan pelatihan yang mencakup *High Angle Rescue*, *Road Accident Rescue*, simulasi terpadu pemadaman kebakaran, serta uji kebugaran dan keterampilan individu. Selain itu, peserta juga memperoleh penguatan kapasitas melalui berbagai sesi lokakarya, antara lain pemadaman kebakaran, ruang terbatas, dan penanganan kecelakaan lalu lintas, guna memperkuat kesiapsiagaan menghadapi kondisi darurat di area operasional.

During the event, each *Emergency Rescue Team (ERT)* took part in a series of competitions and training exercises, including *High Angle Rescue*, *Road Accident Rescue*, integrated fire-fighting simulations, and individual fitness and skills assessments. Participants also enhanced their capabilities through various workshops, covering fire-fighting, confined space operations, and traffic accident response, all aimed at strengthening preparedness for emergency situations in operational areas.

Pembukaan MER-C pada 13 Agustus 2025 dihadiri oleh jajaran direksi dan manajemen PT BSI, perwakilan Kementerian Pariwisata, Badan Nasional Pencarian dan Pertolongan (Basarnas), unsur pemerintah daerah, serta pemangku kepentingan setempat. Selain memperkuat koordinasi lintas entitas dan pemangku kepentingan, kegiatan ini juga menjadi bagian dari persiapan tim ERT untuk berpartisipasi dalam *Indonesian Fire and Rescue Challenge (IFRC)* di tingkat nasional.

The MER-C opening on August 13, 2025, was attended by the board of directors and management of PT BSI, representatives from the Ministry of Tourism, the National Search and Rescue Agency (Basarnas), local government officials, and other local stakeholders. Besides strengthening coordination across subsidiaries and stakeholders, the event also served as preparation for the ERT teams to participate in the *Indonesian Fire and Rescue Challenge (IFRC)* at the national level.

Mekanisme Komunikasi dan Pelaporan Tanggap Darurat

Masyarakat dapat melaporkan kejadian darurat dengan mengikuti prosedur berikut:

- 1. Identifikasi Kejadian** – Menentukan apakah kejadian memerlukan bantuan segera, seperti kebakaran, kecelakaan, bencana alam, atau keadaan medis darurat.
- 2. Menghubungi Nomor Darurat** – Segera menghubungi layanan darurat setempat, seperti pemadam kebakaran, ambulans, atau tim tanggap darurat Perusahaan.
- 3. Menyampaikan Informasi yang Jelas** – Memberikan informasi lengkap, termasuk lokasi kejadian, jenis insiden, jumlah korban, serta potensi bahaya yang dapat memperburuk situasi.
- 4. Mengikuti Instruksi** – Mematuhi arahan dari tim tanggap darurat untuk memastikan keselamatan diri dan orang lain di sekitar lokasi kejadian.
- 5. Memberikan Pertolongan Sementara** – Jika memungkinkan dan aman, memberikan pertolongan pertama atau melakukan evakuasi sementara hingga bantuan profesional tiba.

Komunikasi dan sosialisasi mengenai mekanisme ini dilakukan melalui berbagai kegiatan edukatif, seperti pelatihan dan simulasi di sekolah, penyuluhan kepada masyarakat, serta kampanye keselamatan di lingkungan sekitar. Dengan pendekatan ini, diharapkan masyarakat memiliki pemahaman yang lebih baik dalam menghadapi situasi darurat serta dapat bertindak dengan cepat dan tepat.

Emergency Response Training

The public can report emergency incidents by following these steps:

- 1. Identify the Incident** – Determine whether the situation requires immediate assistance, such as a fire, accident, natural disaster, or medical emergency.
- 2. Contact Emergency Services** – Immediately call local emergency services, such as the fire department, ambulance, or the Company's emergency response team.
- 3. Provide Clear Information** – Share complete details, including the incident location, type of incident, number of victims, and any potential hazards that could escalate the situation.
- 4. Follow Instructions** – Follow directions from the emergency response team to ensure the safety of yourself and others nearby.
- 5. Provide Temporary Assistance** – If safe and feasible, administer first aid or perform temporary evacuation until professional help arrives.

Communication and awareness of this mechanism are conducted through a variety of educational activities, including training and simulations in schools, community outreach programs, and safety campaigns in surrounding areas. This approach is intended to help the public better understand how to respond to emergency situations and take prompt and appropriate action.

Penilaian Dasar Dampak Sosial dan Kesehatan Masyarakat [14.10.2]

Pada tahun 2025, Merdeka melakukan *Penilaian Dasar Dampak Sosial dan Kesehatan Masyarakat* di lima wilayah operasional yaitu Banyuwangi (Jawa Timur), Pohuwato (Gorontalo), Konawe (Sulawesi Tenggara), Morowali (Sulawesi Tengah), dan Pulau Wetar (Maluku Barat Daya). Melalui penilaian ini, perusahaan memperoleh gambaran yang objektif tentang kondisi sosial dan kesehatan masyarakat di sekitar area operasi, sehingga setiap intervensi yang dirancang berbasis data aktual dan diharapkan memberikan dampak berkelanjutan.

Penelitian dilakukan melalui survei, Focus Group Discussion (FGD), serta analisis data sekunder, dan menghasilkan temuan yang berbeda di tiap wilayah. Di Pohuwato, tercatat tingkat kasus Malaria paling tinggi, disertai kerentanan sosial berupa stigma terhadap HIV/AIDS serta meningkatnya konsumsi alkohol di kalangan remaja. Di Banyuwangi, tantangan utama didominasi penyakit tidak menular seperti hipertensi dan diabetes, disusul tingginya kasus stunting. Meski pemerintah setempat sudah menjalankan sejumlah program, melemahnya keterlibatan kader komunitas menjadi celah yang perlu segera diisi agar pendampingan gizi kembali berjalan efektif.

Social Health Baseline Assessment (SHBA)

In 2025, Merdeka conducted a *Social and Health Baseline Assessment (SHBA)* across five operational areas: Banyuwangi (East Java), Pohuwato (Gorontalo), Konawe (Southeast Sulawesi), Morowali (Central Sulawesi), and Wetar Island (Southwest Maluku). Through this assessment, the Company obtained an objective overview of social and community health conditions surrounding its operational areas, ensuring that all interventions are based on actual data and are expected to deliver sustainable impacts.

The assessment was conducted through surveys, Focus Group Discussions (FGDs), and secondary data analysis, resulting in distinct findings for each area. In Pohuwato, malaria cases were the highest, accompanied by social vulnerabilities such as stigma toward HIV/AIDS and increasing alcohol consumption among youth. In Banyuwangi, the main challenges were dominated by non-communicable diseases such as hypertension and diabetes, followed by a high prevalence of stunting. Although local governments have implemented various programs, declining engagement of community health volunteers has created gaps that need to be addressed to ensure effective nutritional support.

Sementara itu, di Konawe, penyalahgunaan narkoba menempati posisi paling mengkhawatirkan. Letak geografis wilayah yang berada di persimpangan tiga provinsi menjadikannya rawan sebagai jalur perlintasan zat terlarang, sehingga ancamannya tidak hanya menyangkut kesehatan masyarakat, tetapi juga menyentuh aspek keselamatan kerja. Di Morowali, kasus Infeksi Saluran Pernapasan Akut (ISPA) dan potensi penularan HIV/AIDS meningkat cukup signifikan. Faktor risiko ini diperkuat oleh perilaku berisiko di komunitas tertentu sehingga dibutuhkan edukasi yang lebih sistematis. Adapun di Pulau Wetar, tantangan besar datang dari tingginya angka stunting dan prevalensi hepatitis B dengan cakupan vaksinasi yang masih rendah. Kerentanan gizi diperparah oleh pola asuh keluarga dan kesadaran yang belum optimal, ditambah stigma sosial yang membuat sebagian orang tua enggan mengakui masalah gizi anak. Departemen K3 sedang menyusun program pencegahan dan mitigasi berdasarkan hasil *Social Health Baseline Assessment* (SHBA).

In Konawe, drug abuse emerged as the most concerning issue. The region's geographical position at the intersection of three provinces increases its vulnerability as a transit route for illegal substances, posing risks not only to public health but also to occupational safety. In Morowali, cases of Acute Respiratory Infections (ARI) and the potential spread of HIV/AIDS have increased significantly, with risk factors further amplified by high-risk behaviors in certain communities, requiring more systematic education efforts. Meanwhile, on Wetar Island, major challenges include a high prevalence of stunting and hepatitis B, coupled with low vaccination coverage. Nutritional vulnerability is further exacerbated by parenting practices and limited awareness, as well as social stigma that discourages some parents from acknowledging child malnutrition issues. The OHS Department is developing prevention and mitigation programs based on the results of the Social Health Baseline Assessment (SHBA).

Kinerja K3 ^{[403-9][14.16.10]}

Pada tahun 2025, Merdeka mencatat peningkatan *Lost Time Injury* (LTI) dari 3 kasus pada 2024 menjadi 6 kasus pada 2025, dengan LTIFR naik dari 0,07 menjadi 0,10. Kenaikan ini terutama dipengaruhi oleh peningkatan aktivitas konstruksi di Tambang Emas Pani, pelaksanaan *major annual shutdown* di AIM, serta peningkatan target produksi dan aktivitas hauling di SCM yang berdampak pada bertambahnya jam kerja dan jumlah tenaga kerja.

Merdeka telah menerapkan pengendalian melalui *Critical Risk Standards* (CRS) dan penguatan pengawasan operasional. Namun evaluasi menunjukkan bahwa efektivitas implementasi critical control di lapangan belum sepenuhnya konsisten.

Ke depan, fokus perbaikan diarahkan pada peningkatan efektivitas verifikasi *critical control*, penguatan kompetensi pengawas, serta peningkatan disiplin operasional untuk memastikan pertumbuhan bisnis tetap selaras dengan kinerja keselamatan yang berkelanjutan.

Tingkat Total *Recordable Injury Frequency Rate* (TRIFR) Merdeka menunjukkan perbaikan, turun dari 0.38 pada 2024 menjadi 0.35 pada 2025. Perusahaan terus menjalin kerjasama yang erat dengan kontraktor untuk memastikan keselarasan dalam standar keselamatan dan kesehatan guna mencapai hasil yang optimal.

Tingkat frekuensi kecelakaan dihitung dengan mengalikan jumlah total cedera yang tercatat (untuk TRIFR) atau jumlah total *Lost Time Injury* (untuk LTIFR) dengan 1.000.000, kemudian membaginya dengan total jam kerja karyawan dan kontraktor.

OHS Performance

In 2025, Merdeka recorded an increase in Lost Time Injury (LTI) cases from 3 in 2024 to 6 in 2025, with the Lost Time Injury Frequency Rate (LTIFR) rising from 0.07 to 0.10. This increase was mainly driven by higher construction activity at Pani Gold Mine, the execution of the major annual shutdown at AIM, and increased production targets and hauling activities at SCM, which resulted in longer working hours and a larger workforce.

Merdeka has implemented controls through Critical Risk Standards (CRS) and strengthened operational oversight. However, evaluations indicate that the implementation of critical controls in the field has not yet been fully consistent.

Moving forward, improvement efforts will focus on enhancing the verification of critical controls, strengthening supervisor competencies, and reinforcing operational discipline to ensure that business growth remains aligned with sustainable safety performance.

Merdeka's Total Recordable Injury Frequency Rate (TRIFR) improved, declining from 0.38 in 2024 to 0.35 in 2025. The company continues to maintain close collaboration with contractors to ensure alignment in safety and health standards and achieve optimal outcomes.

The injury frequency rate is calculated by multiplying the total number of recordable injuries (for TRIFR) or Lost Time Injuries (for LTIFR) by 1,000,000, and then dividing the result by the total working hours of employees and contractors.

Keterangan Description	2023	2024	2025
Jumlah Kematian Fatality	0	0	1
Jumlah Jam Kerja Working Hours	43,092,263	42,305,510	63,078,162
TRIFR*	0.65	0.38	0.35
LTIFR*	0.09	0.07	0.10

*Data hanya mencakup BSI, Tambang Emas Pani, SCM, MTI, Tambang Tembaga Wetar/ Data only covered BSI, Pani Gold Mine, SCM, MTI, and Wetar Copper Mine

Dengan sangat menyesal, Perusahaan melaporkan bahwa pada tahun 2025, terjadi satu (1) insiden kecelakaan fatal yang melibatkan karyawan kontraktor kegiatan *hauling* di *site* PT SCM, yang mengakibatkan korban meninggal dunia akibat kecelakaan lalu lintas di area *hauling*. Perusahaan telah melaporkan kejadian tersebut sesuai dengan ketentuan peraturan perundang-undangan kepada pihak berwenang dan pemangku kepentingan terkait.

It is with deep sadness that the Company reports that in 2025 there was one (1) fatal accident involving a contractor employee during hauling activities at the PT SCM site, resulting from a traffic accident in the hauling area. The Company has reported the incident to the relevant authorities and stakeholders in accordance with applicable laws and regulations.

Selanjutnya, Merdeka telah melakukan proses investigasi lengkap untuk mengidentifikasi akar penyebab insiden ini, serta melaksanakan tindakan perbaikan dan pengendalian tambahan untuk mencegah kejadian serupa di masa mendatang. Tindakan perbaikan yang dilakukan mencakup pelaksanaan pemeriksaan menyeluruh terhadap kondisi unit, kewajiban *commissioning* dan *re-commissioning*, kewajiban melaksanakan uji rem (*brake test*) secara berkala, sistem *hand over unit* setelah dari bengkel sebelum dioperasikan, memastikan kelayakan alat sebelum dioperasikan, memastikan hanya operator yang kompeten dan memenuhi kualifikasi yang diizinkan mengoperasikan kendaraan, memastikan operator dalam kondisi fit bekerja, memastikan bahwa seluruh kegiatan operasional dilakukan sesuai prosedur yang berlaku, dan melakukan evaluasi secara menyeluruh untuk penyediaan dan penandaan jalur perhentian darurat.

Furthermore, Merdeka has conducted a comprehensive investigation to identify the root causes of this incident and implemented corrective actions and additional controls to prevent similar occurrences in the future. These corrective measures include conducting thorough inspections of unit conditions, enforcing commissioning and re-commissioning requirements, performing regular brake tests, implementing a unit handover system from the workshop before operation, ensuring equipment is fit for use, allowing only competent and qualified operators to operate vehicles, verifying that operators are fit for duty, ensuring all operational activities comply with established procedures, and carrying out comprehensive evaluations for the provision and marking of emergency stop routes.

Audit dan Evaluasi Kinerja K3

Untuk memastikan peningkatan berkelanjutan pada SMKP, SMK3 dan ISO 45001:2018, Perusahaan secara rutin melakukan evaluasi dan perbaikan terhadap kedua sistem tersebut. Evaluasi ini dilaksanakan melalui berbagai pendekatan, dengan periode waktu dan metodologi yang disesuaikan dengan kebutuhan yang ada, antara lain:

Audit and Evaluation of OHS Performance

To ensure the continuous improvement of the OHSMS, SMK3, and ISO 45001:2018, the Company routinely conducts evaluations and implements enhancements to these systems. These evaluations are carried out using various approaches, with timelines and methodologies tailored to meet specific operational needs, including:

Proses Tinjauan Manajemen Management Review Process	Proses ini dilaksanakan setiap tahun sekali untuk mengevaluasi kinerja K3 pada tahun sebelumnya dan menetapkan program kerja K3 untuk tahun berikutnya. Tinjauan manajemen dipimpin oleh top manajemen dan dihadiri oleh seluruh pimpinan divisi dan departemen terkait. An annual evaluation of OHS performance from the previous year and the establishment of OHS programs for the upcoming year. This process is led by top management and involves relevant division and department heads.
Proses Internal Audit SMKP dan ISO 45001 Internal Audit of SMKP and ISO 45001	Proses ini dilakukan oleh personil auditor K3 yang kompeten dan telah tersertifikasi sebagai <i>Lead Auditor</i> dan Internal Auditor. Internal Audit dilakukan setiap 1 tahun sekali. Conducted annually by certified and competent OHS auditors to assess compliance and effectiveness.

Eksternal Audit ISO 45001 dan SMK3 External Audit of ISO 45001 and SMK3	<p>Audit ini dilakukan oleh Badan Audit Independen yang kompeten dan telah terakreditasi oleh KAN (Komite Akreditasi Nasional). Eksternal audit dilakukan setiap 1 tahun sekali oleh Lembaga sertifikasi yaitu PT Intertek dengan masa berlaku sertifikat selama 3 tahun. Kegiatan audit yang dilakukan setahun sekali dengan siklus audit sebagai berikut:</p> <p>Tahun ke-1: Audit Sertifikasi Tahun ke-2: Audit <i>Surveillance</i> Pertama Tahun ke-3: Audit <i>Surveillance</i> Kedua Tahun ke-4: kembali ke awal siklus; dilakukan Audit Re-sertifikasi</p> <p>Performed annually by an accredited independent audit body, such as PT Intertek. The audit cycle includes: Year 1: Certification Audit Year 2: First Surveillance Audit Year 3: Second Surveillance Audit Year 4: Recertification Audit</p>
Rapat Komite Kesehatan Keselamatan Pertambangan Mining Health and Safety Committee Meetings	<p>Rapat ini dipimpin oleh KTT dan dihadiri oleh Pimpinan Divisi, Pimpinan Departemen, Pimpinan Kontraktor dan personil bagian K3. Rapat dilakukan 1 bulan sekali. Led by the KTT and attended by divisional heads, department heads, contractor leaders, and OHS personnel. These meetings are held monthly.</p>
Proses Monitoring Leading Indicator dan Lagging Indicator Monitoring Leading and Lagging Indicators	<p>Proses ini juga termasuk memantau tindak lanjut status perbaikan dari NC (<i>non-conformity</i>) yang timbul dari hasil pelaksanaan inspeksi K3, observasi perilaku pekerja, <i>hazard report</i>, dan penyelidikan insiden. <i>Monitoring</i> dilakukan 1 minggu sekali. Involves tracking corrective actions from inspections, worker behavior observations, hazard reports, and incident investigations, with monitoring taking place weekly.</p>
Evaluasi Kecelakaan Kerja/Insiden Work Accident/Incident Evaluation	<p>Apabila terjadi kejadian kecelakaan kerja yang mengakibatkan cedera, hilangnya waktu kerja karyawan, atau kejadian yang signifikan dan berpotensi dapat mengakibatkan kematian atau cedera maka akan diadakan kegiatan evaluasi secara langsung. Evaluasi ini dilakukan sesuai keterjadian. Direct evaluations are conducted for any work accidents resulting in injuries, lost time, or potential fatal incidents. These evaluations are carried out promptly as incidents occur.</p>

Seleksi dan Evaluasi K3 Kontraktor

Merdeka secara konsisten memantau komitmen dan penerapan praktik K3 oleh kontraktor sesuai dengan ketentuan yang tercantum dalam Kode Etik Keberlanjutan dan Standar Sistem Manajemen Kontraktor (CMS) Merdeka. Untuk memastikan komitmen K3 dijalankan dengan baik oleh kontraktor, Divisi Supply Chain Management Merdeka melakukan seleksi terhadap sistem manajemen K3 kontraktor selama proses pemilihan. Selain itu, divisi pengadaan Merdeka juga melaksanakan evaluasi kinerja K3 selama kontraktor menjalankan pekerjaannya.

Indikator evaluasi kinerja K3 kontraktor mencakup pernyataan kebijakan Kesehatan dan Keselamatan Kerja, sistem manajemen K3 yang terdokumentasi, rencana pengelolaan K3, rencana pengelolaan K3 sub-kontraktor, pemeriksaan kesehatan (MCU), alat pelindung diri (APD), prosedur tanggap darurat, asuransi kesehatan, laporan audit K3, statistik kinerja K3, prosedur investigasi insiden dan daftar dan rekaman komisioning peralatan, perkakas, perangkat yang akan digunakan.

Kinerja kontraktor dievaluasi minimal sekali dalam setahun. Merdeka terus berupaya meningkatkan seleksi kontraktor dengan menerapkan kriteria K3. Pada tahun 2025, Merdeka menyeleksi 51 kontraktor utama menggunakan kriteria K3 dalam proses seleksi serta mengevaluasi kinerja K3 dari 93% kontraktor utama selama pelaksanaan kontrak. [403-7][414-1][414-2][14.17.9][14.17.10]

Contractor Selection and Evaluation on OHS

Merdeka consistently monitors contractors' commitment to and implementation of OHS practices in accordance with the provisions of Merdeka's Sustainability Code of Conduct and Contractor Management System (CMS) Standards. To ensure contractors uphold OHS commitments, the Supply Chain Management Division evaluates their OHS management systems during the selection process. Additionally, the Procurement Division conducts ongoing assessments of contractors' OHS performance throughout the execution of their work.

Contractors' OHS performance is evaluated based on several indicators, including their occupational health and safety policy statements, documented OHS management systems, OHS management plans, subcontractor OHS management plans, medical check-ups, personal protective equipment (PPE), emergency response procedures, health insurance coverage, OHS audit reports, OHS performance statistics, incident investigation procedures, and records of commissioning for all equipment, tools, and devices to be used.

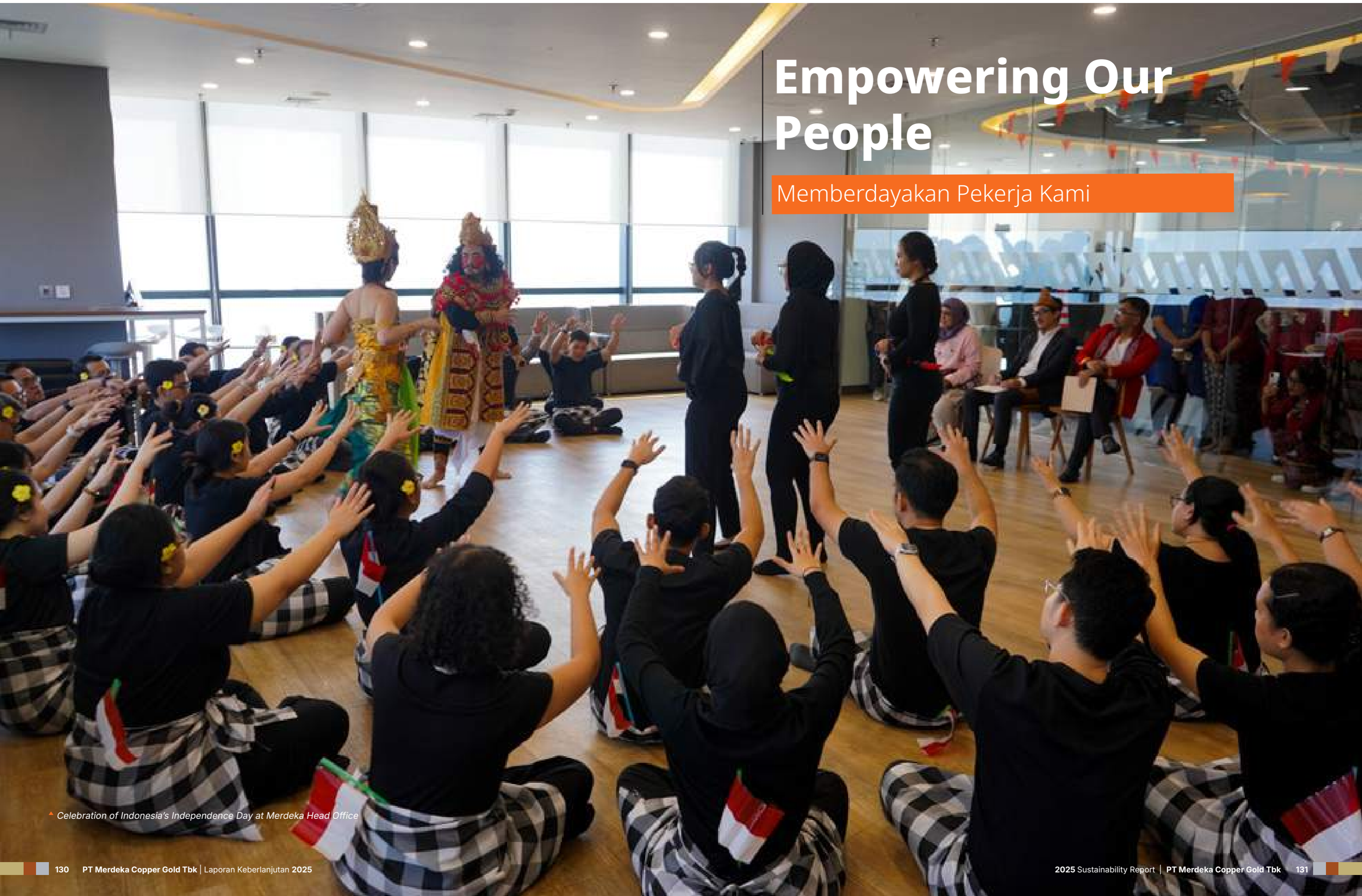
Contractors' performance is evaluated at least once a year. Merdeka continues to strengthen contractor selection by applying OHS criteria. In 2025, Merdeka selected 51 major contractors using OHS criteria during the selection process and evaluated the OHS performance of 93% of key contractors during contract implementation.



▲ The first Merdeka Rescue Challenge (MER-C) at BSI

Empowering Our People

Memberdayakan Pekerja Kami



▲ Celebration of Indonesia's Independence Day at Merdeka Head Office

Memberdayakan Pekerja Kami

Empowering Our People

Pendekatan Manajemen Kami

Merdeka percaya bahwa keberhasilan jangka panjang perusahaan bergantung pada kemampuan kami untuk menciptakan lingkungan kerja yang aman, adil, inklusif, dan mendukung perkembangan setiap individu. Pengelolaan tenaga kerja merupakan prioritas strategis dalam agenda keberlanjutan kami, terutama di tengah dinamika industri pertambangan serta perubahan kompetensi yang diperlukan pada era digital. Tahun 2025 menjadi momentum bagi Merdeka untuk terus memperkuat kualitas sumber daya manusia, meningkatkan ketahanan tenaga kerja lokal, dan membangun budaya kerja yang adaptif serta berintegritas.

Komitmen ini diwujudkan melalui penerapan berbagai kebijakan ketenagakerjaan yang komprehensif. Merdeka memiliki Kebijakan Keberagaman, Kesetaraan, dan Inklusivitas (DEI) yang mendorong terciptanya lingkungan kerja yang menghargai perbedaan dan menjunjung tinggi prinsip kesetaraan. Merdeka juga menerapkan Kebijakan Anti-Korupsi, Kebijakan Anti-Penyuapan, dan Kebijakan Anti Pencucian Uang untuk memastikan integritas, akuntabilitas, dan transparansi dalam seluruh aktivitas perusahaan. Sebagai perusahaan yang menjunjung tinggi nilai hak asasi manusia, Merdeka menetapkan kebijakan Perlindungan Anak dari Pekerja Anak, Penghapusan Kerja Paksa, serta perlindungan terhadap Kebebasan Berserikat. [14.21.5]

Selain itu, berbagai kebijakan lain seperti Kebijakan Anti-Diskriminasi dan Kesetaraan Gender, serta Kebijakan Lingkungan Kerja yang Kondusif dan Positif semakin memperkuat komitmen perusahaan dalam membangun budaya kerja yang aman, sehat, dan berorientasi pada kesejahteraan. Melalui Kebijakan *Speaking Up* dan Anti Pembalasan, seluruh karyawan diberikan ruang untuk menyampaikan pendapat, melaporkan pelanggaran, maupun menyampaikan permasalahan di tempat kerja tanpa rasa takut akan konsekuensi negatif. Semua kebijakan ini disusun berdasarkan Prinsip-Prinsip Konvensi Inti Organisasi Buruh Internasional (*ILO Core Conventions*) dan disosialisasikan secara berkala melalui berbagai saluran komunikasi perusahaan. Implementasinya berada di bawah pengawasan Departemen Sumber Daya Manusia, yang bertanggung jawab langsung kepada Direktur Sumber Daya Manusia dan Presiden Direktur. [14.21.5]

Laporan ini juga menyajikan gambaran terbaru mengenai profil tenaga kerja Merdeka, mencakup total karyawan dan kontraktor, komposisi demografis, serta dinamika rekrutmen dan *turnover*. Kami memaparkan bagaimana Merdeka memperkuat keberagaman dan inklusivitas, mendukung tenaga kerja lokal, dan menjamin lingkungan kerja yang menghormati hak asasi manusia.

Our Management Approach

Merdeka believes that the company's long-term success depends on our ability to create a safe, fair, inclusive, and supportive work environment that enables every individual to grow and thrive. Workforce management is a strategic priority within our sustainability agenda, particularly amid the dynamic nature of the mining industry and the evolving competencies required in the digital era. The year 2025 marks an important milestone for Merdeka to further strengthen the quality of its human resources, enhance the resilience of the local workforce, and foster a work culture that is adaptive and grounded in integrity.

This commitment is implemented through the adoption of comprehensive employment policies. Merdeka has established a Diversity, Equity, and Inclusion (DEI) Policy that promotes a workplace environment that respects differences and upholds the principles of equality. Merdeka also implements Anti-Corruption, Anti-Bribery, and Anti-Money Laundering Policies to ensure integrity, accountability, and transparency in all Company activities. As a company that upholds human rights values, Merdeka has also established policies on the Protection of Children from Child Labor, the Elimination of Forced Labor, and the protection of Freedom of Association.

In addition, several other policies such as the Anti-Discrimination and Gender Equality Policy and the Positive and Conducive Work Environment Policy further strengthen the Company's commitment to fostering a work culture that is safe, healthy, and focused on employee well-being. Through the Speaking Up and Anti-Retaliation Policy, all employees are provided with channels to express their opinions, report violations, or raise workplace concerns without fear of negative consequences. All of these policies are developed in line with the principles of the International Labour Organization (ILO) Core Conventions and are regularly communicated through various corporate communication channels. Their implementation is overseen by the Human Resources Department, which reports directly to the Director of Human Resources and the President Director.

This report also presents the latest overview of Merdeka's workforce profile, including the total number of employees and contractors, demographic composition, as well as recruitment and turnover trends. It also outlines how Merdeka promotes diversity and inclusion, supports the local workforce, and ensures a work environment that respects human rights.

Sejalan dengan kebutuhan kompetensi masa depan, Merdeka mengutamakan peningkatan keterampilan melalui program pelatihan teknis, pengembangan kompetensi digital, serta pembinaan kepemimpinan. Sistem penilaian kinerja yang terstruktur turut memastikan bahwa setiap karyawan memiliki arah pengembangan yang jelas dan konsisten.

Dalam hal kesejahteraan, Merdeka menyediakan paket kompensasi dan *benefit* yang kompetitif, program persiapan pensiun, serta berbagai fasilitas kesehatan dan kebugaran. Selain itu, hubungan industrial yang harmonis dijaga melalui kerja sama dengan serikat pekerja, pelaksanaan Perjanjian Kerja Bersama dan Peraturan Perusahaan, serta mekanisme pengaduan yang responsif dan mudah diakses.

Dengan pendekatan yang holistik dan terstruktur ini, Merdeka memastikan bahwa seluruh kebijakan dan program ketenagakerjaan tidak hanya memenuhi standar nasional dan internasional, tetapi juga memberikan dampak positif bagi seluruh karyawan. Upaya memberdayakan pekerja ini menjadi landasan penting bagi keberlanjutan bisnis dan daya saing Merdeka di masa depan.

Seluruh kebijakan ketenagakerjaan Merdeka dapat diakses melalui laman resmi perusahaan: [Merdeka Copper Gold - Documents](#).

In line with future competency needs, Merdeka prioritizes skills development through technical training programs, digital competency development, and leadership development initiatives. A structured performance appraisal system also ensures that every employee has a clear and consistent development pathway.

In terms of employee well-being, Merdeka provides competitive compensation and benefits packages, retirement preparation programs, and various health and wellness facilities. In addition, harmonious industrial relations are maintained through collaboration with labor unions, the implementation of Collective Labor Agreements and Company Regulations, as well as responsive and easily accessible grievance mechanisms.

Through this holistic and structured approach, Merdeka ensures that all employment policies and programs not only comply with national and international standards but also create positive impacts for all employees. Efforts to empower the workforce serve as an important foundation for the Company's long-term business sustainability and competitiveness.

All of Merdeka's employment policies can be accessed through the Company's official website: [Merdeka Copper Gold - Documents](#).

2025 Performance

Skill improvement and leadership development

- > Provided a total of 129,135 hours of skill improvement training
- > USD 0.85 million invested in training and development

Diversity, Equity, and Inclusion (DEI)

- > Number of female employees increased by 0.2% compared to the previous year
- > Female equipment operators at BKP-BTR: 11% of the total operators
- > Female equipment operators at BSI: 7% of the total operators

Employee Engagement

- > Conducted employee engagement surveys
- > Conducted lunch and afternoon coffee with the Board of Directors sessions
- > Conducted Corporate Volunteer (Bakti Merdeka) programmes

2026 Target

Skill improvement and leadership development

- > Provide training according to the training needs analysis

Diversity, Equity, and Inclusion (DEI)

- > Increase the percentage of female equipment operators
- > Increase the number of female employees

Employee Engagement

- > Increase employee engagement
- > Conduct employee engagement surveys
- > Conduct Merdeka Improvement program
- > Conduct lunch and afternoon coffee with BoD



Struktur dan Komposisi Tenaga Kerja

Sebagai perusahaan pertambangan dan mineral dengan operasi yang tersebar di berbagai lokasi di Indonesia, Merdeka mengandalkan tenaga kerja yang kompeten, beragam, dan berkomitmen tinggi untuk memastikan keberhasilan operasional dan keberlanjutan jangka panjang.

Pada tahun 2025, Merdeka tidak melakukan pengurangan karyawan dalam skala besar. Hingga akhir tahun 2025, total karyawan di Merdeka berjumlah 9.557 orang. Dari jumlah karyawan tersebut, 1.109 orang atau 11,6% adalah perempuan, berkurang 10 orang perempuan atau 0,2% dibanding tahun 2024. Selain itu, hingga akhir tahun 2025 total persentase karyawan kontraktor dibanding dengan total karyawan perusahaan adalah sebesar 73%.

Karyawan Kontraktor adalah mereka yang melakukan pekerjaan untuk Merdeka tetapi tidak memiliki hubungan kerja langsung dengan Merdeka dan yang pekerjaannya dikendalikan oleh Merdeka. Merdeka bekerja sama dengan kontraktor untuk melakukan beberapa pekerjaan seperti bidang pengupasan, pemindahan dan penimbunan tanah/batuan penutup, penggalian, pemuatan dan pemindahan lapisan, penyediaan alat berat, pengangkutan bijih menggunakan *dump truck*, revegetasi, penanaman, perawatan tanaman serta beberapa bidang pekerjaan lainnya.

Komposisi tenaga kerja selama tiga tahun terakhir dihitung menggunakan metode headcount dan disajikan dalam berbagai aspek demografis seperti jenis kelamin, kelompok usia, lokasi kerja, dan level jabatan sebagai berikut: [2-7] [2-8] [C.3]

Tabel Total Karyawan dan Karyawan Kontraktor Total Company's Employees and Contractor's Employees

	2023	%	2024	%	2025	%
Total Karyawan Perusahaan Total Number of Company Employees	10,970	47%	9,492	48%	9,557	27%
Total Karyawan Kontraktor Total Number of Contractor Employees	12,533	53%	10,489	52%	25,318	73%
Total	23,503	100%	19,981	100%	34,875	100%

Tabel Karyawan Berdasarkan Jenis Kelamin dan Status Kepegawaian Total Employees Based on Gender and Employment Status

Jenis Kelamin Gender	2023			2024			2025		
	Karyawan tetap* Permanent Employees	Karyawan kontrak Contract Employees**	Total	Karyawan tetap* Permanent Employees	Karyawan kontrak Contract Employees**	Total	Karyawan tetap* Permanent Employees	Karyawan kontrak Contract Employees**	Total
Laki-laki Male	5,740	4,140	9,880	5,957	2,416	8,373	5,791	2,657	8,448
Perempuan Female	788	302	1,090	924	195	1,119	931	178	1,109
Total	6,528	4,442	10,970	6,881	2,611	9,492	6,722	2,835	9,557

Workforce Structure and Composition

As a mining and minerals company with operations across various locations in Indonesia, Merdeka relies on a competent, diverse, and highly committed workforce to ensure operational success and long-term sustainability.

In 2025, Merdeka did not conduct any large-scale workforce reductions. As of the end of 2025, the total number of employees at Merdeka was 9,557 people. Of this total, 1,109 employees, or 11.6%, were women, representing a decrease of 10 female employees or 0.2% compared to 2024. In addition, as of the end of 2025, contractor employees accounted for 73% of the Company's total workforce.

Contractor employees are individuals who perform work for Merdeka but do not have a direct employment relationship with the Company, although their work activities are controlled by Merdeka. The Company collaborates with contractors to carry out several types of work, including overburden stripping, removal and stockpiling of overburden material, excavation, loading and hauling of material, provision of heavy equipment, ore transportation using dump trucks, revegetation, planting, plant maintenance, and several other operational activities.

Workforce composition over the past three years is calculated using the headcount method and presented across various demographic aspects, including gender, age group, work location, and job level, as follows:

Tabel Karyawan Berdasarkan Lokasi Kerja dan Status Kepegawaian Total Employees Based on Work Location and Employment Status

Lokasi kerja Work location	2023			2024			2025		
	Karyawan tetap* Permanent Employees	Karyawan kontrak Contract Employees**	Total	Karyawan tetap* Permanent Employees	Karyawan kontrak Contract Employees**	Total	Karyawan tetap* Permanent Employees	Karyawan kontrak Contract Employees**	Total
Wetar	1,175	549	1,724	1,031	350	1,381	617	115	732
Bali	11	18	29	8	3	11	0	0	0
Banyuwangi	1,448	214	1,662	1,336	210	1,546	1,328	139	1,467
Marisa	143	508	651	220	194	414	336	662	998
Jakarta	385	84	469	415	63	478	483	60	543
Konawe	234	796	1,030	337	722	1,059	484	918	1,402
Morowali	3,111	2,254	5,365	3,510	1,047	4,557	3,455	924	4,379
Jakarta	16	-	16	16	0	16	15	0	15
Lain-lain	5	19	24	8	22	30	4	17	21
Total	6,528	4,442	10,970	6,881	2,611	9,492	6,722	2,835	9,557

*Permanent Employees: Employees with indefinite time employment agreement (Perjanjian Kerja Waktu Tidak Tertentu/PKWTT)
**Contract Employees: Employees with fixed-term employment agreement (Perjanjian Kerja Waktu Tertentu/PKWTT)

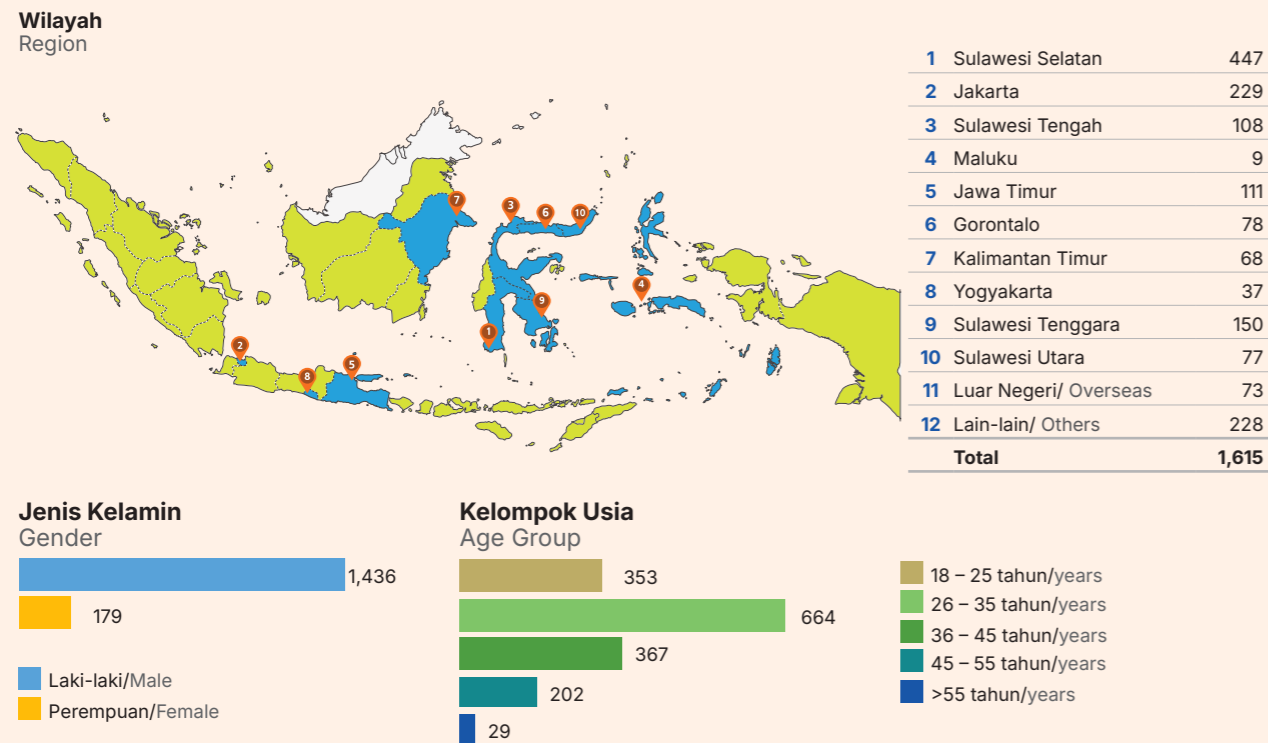
Tabel Karyawan Berdasarkan Jenis Kelamin dan Level Jabatan [405-1] Total Employees Based on Gender and Level

Level	2023			2024			2025		
	Laki-laki Male	Perempuan Female	Total	Laki-laki Male	Perempuan Female	Total	Laki-laki Male	Perempuan Female	Total
Senior Management	110	7	114	98	11	109	97	14	111
Manager	138	27	165	136	28	164	137	25	162
Superintendent	271	24	295	285	23	308	360	39	399
Supervisor	816	96	912	813	94	907	1,062	129	1,191
Staff	1,719	375	2,094	1,679	414	2,093	1,640	457	2,097
Non-Staff	6,829	561	7,390	5,362	549	5,911	5,152	445	5,597
Total	9,880	1,090	10,970	8,373	1,119	9,492	8,448	1,109	9,557

Tabel Karyawan Berdasarkan Usia dan Jabatan Total Employees Based on Age and Level

Level	2023						2024						2025					
	Usia Age						Usia Age						Usia Age					
	18-25	26-35	36-45	45-55	>55	Total	18-25	26-35	36-45	45-55	>55	Total	18-25	26-35	36-45	45-55	>55	Total
Senior Management	0	2	34	46	32	114	0	3	35	45	26	109	0	3	40	41	27	111
Manager	0	22	71	56	16	165	0	28	74	53	8	163	0	29	70	55	8	162
Superintendent	1	72	121	82	19	295	0	72	135	84	18	309	1	97	171	113	17	399
Supervisor	8	311	349	215	29	912	6	346	340	200	15	907	24	473	408	260	26	1,191
Staff	413	866	494	290	31	2,094	330	927	581	249	6	2,093	257	926	616	280	18	2,097
Non-Staff	1,685	3,112	1,832	728	33	7,390	1,822	2,682	1,054	339	14	5,911	682	3,188	1,273	435	19	5,597
Total	2,107	4,385	2,901	1,417	160	10,970	2,158	4,058	2,219	970	87	9,492	964	4,716	2,578	1,184	115	9,557

Rekrutmen Karyawan Berdasarkan Wilayah, Jenis Kelamin, dan Kelompok Usia Employee Recruitment Based on Region, Gender, and Age Group



Pada tahun 2025, karyawan meninggalkan perusahaan karena berbagai alasan, dengan alasan paling umum adalah berakhirnya kontrak sebanyak 486 karyawan, diikuti oleh kesepakatan bersama sebanyak 460 karyawan serta kompensasi dan benefit sebanyak 266 karyawan. Faktor lainnya mencakup alasan keluarga sebanyak 150 karyawan, alasan pribadi sebanyak 46 karyawan, masalah kesehatan sebanyak 22 karyawan, dan pensiun sebanyak 19 karyawan. Selain itu, 43 karyawan berhenti karena pelanggaran, 32 karena kinerja di bawah standar, dan 12 karyawan meninggal dunia. Secara keseluruhan, 1,562 karyawan keluar dari perusahaan pada tahun 2025. Perbandingan pergantian karyawan dapat dilihat pada [Laporan Keberlanjutan](#) sebelumnya.

In 2025, employees left the Company for various reasons, with the most common being the completion of contract terms, accounting for 486 employees. This was followed by the mutual agreement accounting for 460 employees, and compensation and benefits considerations involving 266 employees. Other reasons included family-related factors involving 150 employees, personal reasons involving 46 employees, health-related issues affecting 22 employees, and retirement involving 19 employees. In addition, 43 employees left due to violations, 32 due to below-standard performance, and 12 employees passed away. Overall, 1,562 employees left the Company in 2025. A comparison of employee turnover can be found in the previous [Sustainability Report](#).

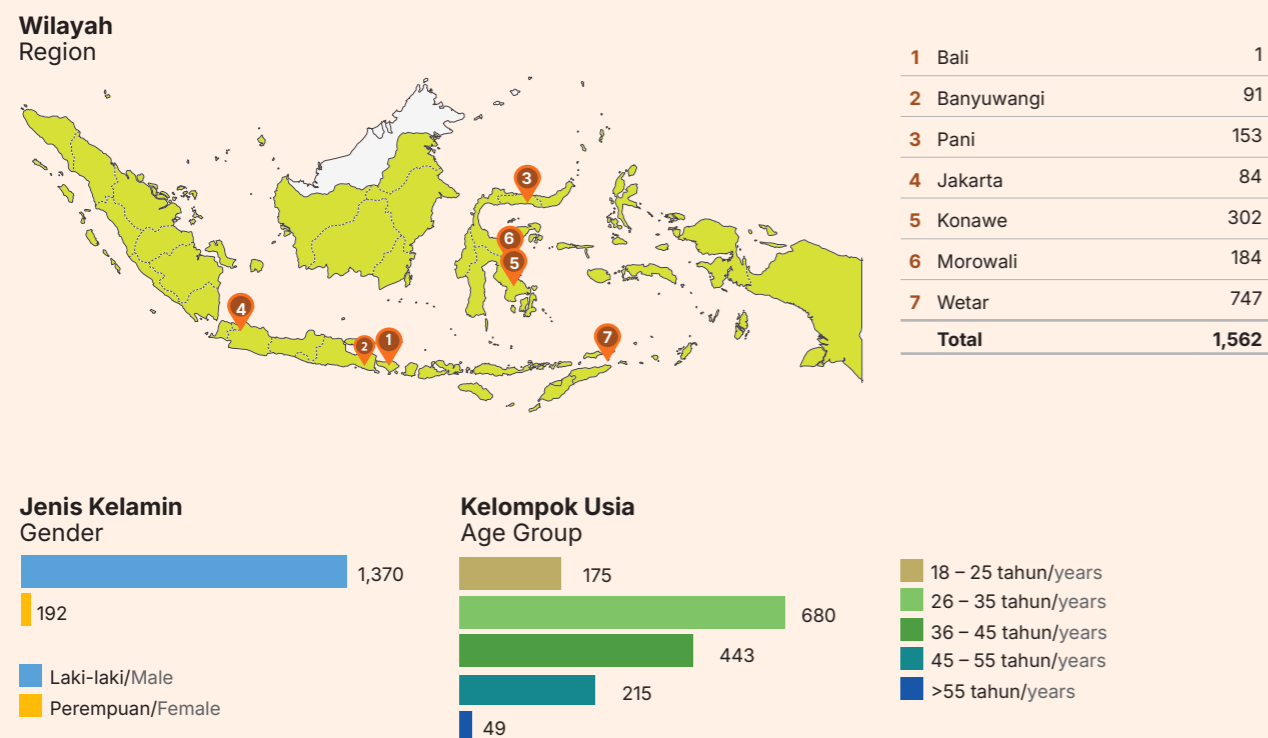
Angka kenaikan jumlah karyawan yang keluar di Tambang Wetar dipengaruhi oleh dinamika operasional seiring dengan menurunnya cadangan *in-situ* di area Partolang dan Lerokis. Kondisi ini berdampak pada penyesuaian kebutuhan tenaga kerja, khususnya untuk fungsi operasional yang terkait langsung dengan aktivitas penambangan di kedua area tersebut. Perusahaan saat ini tengah melakukan studi untuk mengoptimalkan pemanfaatan sumber daya yang tersisa serta mengelola peningkatan cadangan AIM yang berasal dari akumulasi *stockpile* hasil penambangan sebelumnya.

The increase in employee turnover at Wetar Mine was influenced by operational dynamics associated with the declining *in-situ* reserves in the Partolang and Lerokis areas. This condition led to adjustments in workforce requirements, particularly for operational functions directly related to mining activities in those areas. The Company is currently conducting studies to optimize the utilization of remaining resources and to manage the increase in AIM reserves derived from the accumulation of previously mined stockpiles.

Perusahaan secara berkelanjutan melakukan evaluasi terhadap strategi pengelolaan tenaga kerja, termasuk peningkatan daya saing paket remunerasi, penguatan program pengembangan karier, serta optimalisasi perencanaan tenaga kerja untuk mengantisipasi kebutuhan operasional jangka panjang. Selain itu, Perusahaan juga memperkuat upaya retensi melalui peningkatan keterlibatan karyawan, penyediaan lingkungan kerja yang aman dan kondusif, serta dukungan terhadap keseimbangan kehidupan kerja.

The Company continuously evaluates its workforce management strategy, including enhancing the competitiveness of remuneration packages, strengthening career development programs, and optimizing workforce planning to anticipate long-term operational needs. In addition, the Company reinforces retention efforts by improving employee engagement, providing a safe and conducive working environment, and supporting work-life balance.

Turnover Karyawan Berdasarkan Wilayah, Jenis Kelamin, dan Kelompok Usia Employee Turnover Based on Region, Gender, and Age Group



Keberagaman, Kesetaraan, dan Inklusivitas di Tempat Kerja (DEI) [F.18]

Merdeka berkomitmen penuh untuk menciptakan lingkungan kerja yang inklusif, di mana setiap individu merasa dihargai dan memiliki peluang yang setara untuk mengembangkan karir. Komitmen ini diwujudkan melalui Kebijakan Keberagaman, Kesetaraan, dan Inklusivitas (DEI), yang menjadi panduan utama dalam menciptakan budaya kerja yang adil dan menghormati perbedaan.

Sebagai bagian dari implementasi kebijakan tersebut, proses perekrutan karyawan di Merdeka dilakukan dengan menjunjung tinggi prinsip kesetaraan. Setiap kandidat diberikan peluang yang sama untuk bergabung, tanpa memandang latar belakang, gender, ras, dan agama. Kompetensi dan kesesuaian dengan nilai-nilai perusahaan menjadi kriteria utama dalam setiap proses seleksi.

Merdeka juga memastikan bahwa seluruh karyawan memiliki kesempatan setara untuk berkembang. Penempatan dalam program pengembangan karier dan promosi dilakukan secara objektif berdasarkan prestasi, potensi, dan kebutuhan bisnis. Hal ini menciptakan lingkungan kerja yang adil dan mendukung setiap individu untuk mencapai potensi maksimal mereka.

Dalam pengelolaan tim, kebijakan ini mendorong keterlibatan karyawan dengan memprioritaskan prinsip inklusivitas. Setiap karyawan diberikan kebebasan untuk menyampaikan ide, gagasan, atau usulan tanpa hambatan. Selain itu, tim kerja didorong untuk menghargai keberagaman sebagai nilai utama yang memperkaya kolaborasi dan inovasi di tempat kerja.

Kebijakan ini bersifat non-diskriminatif, memastikan bahwa setiap individu mendapatkan kesempatan yang sama tanpa diskriminasi dalam bentuk apa pun. Dengan demikian, kebijakan ini menjadi landasan utama dalam menciptakan lingkungan kerja yang inklusif, adil, dan menghargai kontribusi setiap individu.

Untuk meningkatkan kesadaran tentang prinsip-prinsip Keberagaman, Kesetaraan, dan Inklusi (DEI), Merdeka secara efektif mengkomunikasikan kebijakan DEI kepada seluruh karyawan melalui email rutin dan pelatihan Kode Etik. Upaya ini bertujuan untuk memastikan bahwa karyawan memahami dan menghayati nilai-nilai keberagaman, kesetaraan, dan inklusi dalam pekerjaan sehari-hari mereka.

Presiden Direktur dan Direktur Sumber Daya Manusia bertanggung jawab untuk memastikan dan memantau kinerja keberagaman, kesetaraan, dan inklusivitas, serta melaporkan kinerjanya kepada Direksi secara berkala. Kebijakan DEI dapat diakses di [Merdeka Copper Gold – Documents](#).

Diversity, Equity, and Inclusion in the Workplace (DEI)

Merdeka is fully committed to creating an inclusive work environment where every individual feels valued and has equal opportunities to develop their careers. This commitment is implemented through the Diversity, Equity, and Inclusion (DEI) Policy, which serves as the primary guideline for fostering a fair workplace culture that respects differences.

As part of the implementation of this policy, employee recruitment at Merdeka is conducted in accordance with the principles of equality. Every candidate is given the same opportunity to join the Company, regardless of background, gender, race, or religion. Competence and alignment with the Company's values are the primary criteria in every selection process.

Merdeka also ensures that all employees have equal opportunities for growth and development. Participation in career development programs and promotions is determined objectively based on performance, potential, and business needs. This approach fosters a fair work environment that supports each individual in achieving their full potential.

In team management, this policy encourages employee engagement by prioritizing the principles of inclusivity. Every employee is given the freedom to express ideas, suggestions, or proposals without barriers. In addition, work teams are encouraged to value diversity as a core principle that enriches collaboration and innovation in the workplace.

This policy is non-discriminatory, ensuring that every individual has equal opportunities without discrimination in any form. As such, the policy serves as a key foundation for creating a work environment that is inclusive, fair, and appreciative of each individual's contribution.

To increase awareness of the principles of Diversity, Equity, and Inclusion (DEI), Merdeka effectively communicates the DEI Policy to all employees through regular emails and Code of Conduct training. These efforts aim to ensure that employees understand and internalize the values of diversity, equity, and inclusion in their daily work.

The President Director and the Director of Human Resources are responsible for ensuring and monitoring the Company's diversity, equity, and inclusion performance, and for reporting this performance periodically to the Board of Directors. The DEI Policy can be accessed at [Merdeka Copper Gold – Documents](#).

Mengembangkan Keterampilan Tenaga Kerja Lokal

Wetar Copper Mine

Pada Januari 2025, Wetar Copper Mine meluluskan tujuh pekerja lokal dari Program Pelatihan Welder (*Welding Apprentice*). Program ini bertujuan meningkatkan kompetensi teknis tenaga kerja lokal agar sesuai dengan kebutuhan operasional dan standar industri pertambangan, sekaligus memperluas peluang kerja di dalam maupun di luar area tambang. Pelatihan dilaksanakan selama satu tahun melalui seleksi karyawan lokal, dengan total sekitar 1.000 jam pelatihan kelas dan 2.500 jam praktik lapangan, serta mencakup 36 modul kompetensi pengelasan. Program didanai melalui anggaran pengembangan sumber daya manusia perusahaan.

Penerima manfaat langsung program ini adalah tujuh pekerja lokal yang memperoleh sertifikasi welder. Manfaat tidak langsung dirasakan oleh keluarga peserta dan masyarakat sekitar melalui peningkatan peluang kerja dan potensi pendapatan. Program ini menyasar masyarakat usia produktif di sekitar wilayah operasional yang memiliki keterbatasan akses terhadap pelatihan keahlian teknis bersertifikat.

Capaian program ditunjukkan oleh kelulusan seluruh peserta dan kesiapan mereka untuk bekerja sesuai standar keselamatan dan kualitas kerja. Program ini berkontribusi pada peningkatan kapasitas tenaga kerja lokal dan mendukung pengembangan sumber daya manusia secara berkelanjutan. Keberhasilan program ini menjadi dasar pengembangan pelatihan keahlian lain bagi masyarakat sekitar.



Tambang Emas Pani

Sebagai bagian dari strategi pengembangan sumber daya manusia lokal dan kesiapan operasional jangka panjang, Tambang Emas Pani mengimplementasikan *Talent Development Program* (TDP) yang dikelola oleh Departemen Sumber Daya Manusia sejak akhir 2023. Program ini difokuskan pada peningkatan keterampilan teknis, pembentukan sikap kerja profesional, perluasan wawasan karier, serta peningkatan penyerapan tenaga kerja lokal di Kabupaten Pohuwato, Provinsi Gorontalo. TDP menyasar masyarakat lingkaran tambang dan tenaga kerja lokal pada level operator, *trainee*, hingga pendidik vokasi, sebagai bagian dari upaya membangun rantai talenta lokal yang berkelanjutan dan selaras dengan kebutuhan industri pertambangan.

Developing Local Workforce Skills

Wetar Copper Mine

In January 2025, Wetar Copper Mine graduated seven local workers from the Welder Training Program (*Welding Apprenticeship*). The program is designed to enhance the technical competencies of the local workforce to meet operational requirements and mining industry standards, while also expanding employment opportunities both within and outside the mine area. The training lasted one year and involved a selection of local employees, with approximately 1,000 hours of classroom instruction and 2,500 hours of field practice, covering 36 welding competency modules. The program was funded through the company's human resource development budget.

The direct beneficiaries of this program are the seven local workers who received welder certification. Indirect benefits extend to the participants' families and the surrounding community, through increased employment opportunities and potential income. The program targets working-age individuals in the operational areas who have limited access to certified technical skills training.

The program's success is evidenced by the graduation of all participants and their readiness to work in compliance with safety and quality standards. It contributes to strengthening the capacity of the local workforce and supports sustainable human resource development. This achievement also provides a foundation for developing additional skills training programs for the surrounding community.



Pani Gold Mine

As part of its strategy to develop local human resources and support long-term operational readiness, Pani Gold Mine has been implementing the *Talent Development Program* (TDP) under the management of the Human Resources Department since late 2023. The program focuses on enhancing technical skills, cultivating professional work attitudes, broadening career perspectives, and increasing the employment of local labor in Pohuwato Regency, Gorontalo Province. TDP targets communities around the mine and local workers, ranging from operators and trainees to vocational educators, as part of the effort to build a sustainable local talent pipeline aligned with the mining industry's needs.

Pada tahun 2025, TDP dikembangkan melalui beberapa gelombang dengan desain program yang semakin adaptif dan berbasis kebutuhan. TDP IV berfokus pada peningkatan kompetensi operator lokal melalui program *upskilling* dari *small truck* menjadi *articulated dump truck* (ADT) operator, dengan metode pembelajaran terintegrasi antara kelas dan praktik lapangan selama 80–100 jam. TDP V memperluas cakupan program ke sektor pendidikan melalui pendampingan guru SMK di Kabupaten Pohuwato, guna memperkuat keterkaitan antara kurikulum vokasi dan kebutuhan industri. Selanjutnya, TDP VII melibatkan 46 peserta, dengan 93% berasal dari Kabupaten Pohuwato, yang mengikuti pelatihan intensif selama dua bulan di PT Bumi Suksesindo (BSI) di Banyuwangi sebagai bagian dari persiapan tenaga kerja menjelang fase produksi. Program-program tersebut dikelola langsung oleh fungsi HR PGP dengan dukungan instruktur internal, mitra industri, dan pemangku kepentingan pendidikan.

Pengembangan program berlanjut pada TDP VIII – *Green Operator Dump Truck*, yang dilaksanakan selama dua bulan dengan total durasi sekitar 200 jam pelatihan, mengombinasikan pembelajaran kelas, praktik lapangan, serta pembinaan mental dan fisik. Program ini melibatkan delapan peserta, termasuk partisipasi perempuan, sebagai wujud komitmen terhadap inklusivitas dan kesetaraan kesempatan kerja. Secara keseluruhan, TDP memberikan nilai tambah melalui peningkatan kesiapan teknis tenaga kerja lokal, penguatan budaya keselamatan dan disiplin kerja, serta pembentukan kepemimpinan operasional di tingkat lapangan. Dalam jangka panjang, program ini mendukung kinerja operasional perusahaan, memperkuat kolaborasi lintas fungsi dan pemangku kepentingan, serta berkontribusi pada pembangunan ekonomi lokal yang berkelanjutan di wilayah sekitar tambang.

Karyawan Difabel: Komitmen Merdeka terhadap Lingkungan Kerja yang Inklusif

Merdeka berkomitmen untuk menciptakan lingkungan kerja yang inklusif dan ramah bagi semua individu, termasuk mereka dengan kemampuan berbeda sebagaimana diatur dalam Kebijakan Pengelolaan Penyandang Disabilitas di Tempat Kerja. Sebagai bagian dari upaya ini, perusahaan telah merekrut talenta-talenta difabel untuk mengisi berbagai posisi strategis di kantor pusat Jakarta, menunjukkan komitmen nyata terhadap keberagaman di tempat kerja.

Selain memberikan kesempatan yang setara, Merdeka juga secara aktif menyelenggarakan program pelatihan dan kesadaran bagi seluruh karyawan. Program ini bertujuan untuk meningkatkan pemahaman dan kemampuan dalam berinteraksi serta bekerja sama secara efektif dengan rekan kerja difabel, menciptakan lingkungan yang saling mendukung dan menghargai.

In 2025, the TDP was implemented in several waves, with program designs becoming increasingly adaptive and tailored to specific needs. TDP IV focused on enhancing the skills of local operators through an upskilling program, advancing from small truck operators to articulated dump truck (ADT) operators, using an integrated learning approach that combined classroom instruction and field practice for 80–100 hours. TDP V expanded the program to the education sector by mentoring vocational high school teachers in Pohuwato Regency, strengthening the connection between vocational curricula and industry requirements. TDP VII involved 46 participants, 93% of whom were from Pohuwato Regency, undertaking intensive two-month training at PT Bumi Suksesindo (BSI) in Banyuwangi in preparation for the production phase. These programs are directly managed by the HR function of PGP, with support from internal instructors, industry partners, and educational stakeholders.

The program continued with TDP VIII – Green Operator Dump Truck, which was conducted over two months, totaling approximately 200 hours of training. It combined classroom learning, hands-on field practice, and mental and physical development. The program involved eight participants, including women, reflecting a commitment to inclusivity and equal employment opportunities. Overall, the TDP added value by enhancing the technical readiness of the local workforce, strengthening a culture of safety and work discipline, and fostering operational leadership at the field level. In the long term, the program supports the company's operational performance, reinforces cross-functional and stakeholder collaboration, and contributes to sustainable local economic development in the communities surrounding the mine.

Employees with Disabilities: Merdeka's Commitment to an Inclusive Work Environment

Merdeka is committed to creating an inclusive and accessible work environment for all individuals, including persons with disabilities, as outlined in the Workplace Disability Management Policy. As part of this commitment, the Company has recruited talented persons with disabilities to fill various strategic positions at its Jakarta head office, demonstrating its commitment to workplace diversity.

In addition to providing equal opportunities, Merdeka also actively organizes training and awareness programs for all employees. These programs aim to enhance understanding and strengthen employees' ability to interact and collaborate effectively with colleagues with disabilities, thereby fostering a supportive and respectful workplace environment.

Merdeka Copper Gold bersama Yayasan Helping Hands Perkuat Budaya Inklusi Lewat Pertemuan "KataKita" di Hari Disabilitas Internasional

Dalam rangka Hari Disabilitas Internasional, PT Merdeka Copper Gold Tbk berpartisipasi dalam InklusiFest 2025 yang diselenggarakan oleh Yayasan Helping Hands pada 4 Desember 2025 melalui pertemuan dialog inklusif "KataKita". Kegiatan ini dirancang sebagai ruang interaksi setara antara karyawan perusahaan dan siswa Sekolah Luar Biasa (SLB) untuk memperkuat pemahaman, empati, dan kesadaran inklusivitas. Program ini mencerminkan komitmen perusahaan dalam mengintegrasikan prinsip keberagaman dan inklusi sebagai bagian dari pengelolaan dampak sosial yang bertanggung jawab.

Pertemuan "KataKita" melibatkan 40 peserta, terdiri dari 20 karyawan Merdeka dan 20 siswa penyandang disabilitas, yang berdialog secara virtual dalam format satu lawan satu selama 45 menit. Seluruh sesi difasilitasi dengan akomodasi yang layak, termasuk fitur aksesibilitas digital, guna memastikan partisipasi yang setara. Bagi siswa SLB, kegiatan ini memberikan akses langsung pada wawasan dunia kerja, meningkatkan kepercayaan diri, serta memperkuat motivasi pendidikan. Sementara itu, karyawan memperoleh peningkatan kapasitas dalam memahami isu disabilitas dan praktik inklusi di lingkungan profesional.

Partisipasi Merdeka dalam InklusiFest 2025 berkontribusi pada penguatan budaya inklusif dan partisipasi sosial penyandang disabilitas sebagai bagian dari investasi sosial jangka panjang perusahaan. Melalui pendekatan dialogis dan kolaboratif, program ini mendukung penciptaan nilai bersama dengan membangun perspektif yang lebih inklusif di dunia kerja serta mendorong kesetaraan kesempatan bagi kelompok rentan untuk tumbuh dan berkontribusi secara berkelanjutan.



Merdeka Copper Gold and Helping Hands Foundation Strengthen Inclusion Culture Through "KataKita" Dialogue on International Day of Persons with Disabilities

In observance of the International Day of Persons with Disabilities, PT Merdeka Copper Gold Tbk participated in InklusiFest 2025, organized by the Helping Hands Foundation on December 4, 2025, through the inclusive dialogue event "KataKita". The activity provided a space for equal interaction between company employees and students from Special Needs Schools (SLB) to foster understanding, empathy, and awareness of inclusivity. This program highlights the company's commitment to embedding diversity and inclusion principles as part of responsible social impact management.

The "KataKita" session involved 40 participants 20 Merdeka employees and 20 students with disabilities who engaged in one-on-one virtual dialogues lasting 45 minutes. All sessions were conducted with appropriate accommodations, including digital accessibility features, to ensure full and equal participation. For the SLB students, the activity provided direct insight into the world of work, enhanced their confidence, and strengthened their educational motivation. Meanwhile, employees gained a deeper understanding of disability-related issues and inclusive practices in a professional setting.

Merdeka's participation in InklusiFest 2025 contributed to strengthening an inclusive culture and enhancing the social participation of people with disabilities as part of the company's long-term social investment. Through a dialogic and collaborative approach, the program helps create shared value by fostering a more inclusive perspective in the workplace and promoting equal opportunities for vulnerable groups to grow and contribute sustainably.

Merdeka Rayakan Hari Perempuan Internasional 2025 dengan Kegiatan Inspiratif

Dalam rangka *International Women's Day 2025*, Kantor Pusat Jakarta menyelenggarakan rangkaian kegiatan internal bertema *#AccelerateAction: Semangat Perempuan, Energi Perubahan*. Kegiatan ini dirancang sebagai program penguatan budaya kerja inklusif dan berkeadilan gender, dengan tujuan meningkatkan kesejahteraan, kapasitas, dan partisipasi perempuan di lingkungan kerja. Program dilaksanakan melalui tiga bentuk kegiatan utama, yaitu kelas pengembangan diri (*beauty class*), webinar pengembangan karier, serta program donasi sosial. Seluruh kegiatan didanai melalui anggaran internal perusahaan sebagai bagian dari inisiatif keberlanjutan sumber daya manusia dan tanggung jawab sosial.

Penerima manfaat langsung dari rangkaian kegiatan ini mencakup sedikitnya 42 karyawan perempuan yang mengikuti kelas pengembangan diri, serta karyawan Grup Merdeka yang berpartisipasi dalam webinar pengembangan karier. Manfaat tidak langsung dirasakan oleh kelompok rentan di luar perusahaan, termasuk penyandang disabilitas, perempuan, anak-anak, dan masyarakat yang membutuhkan melalui program donasi pakaian layak pakai. Lebih dari 800 item donasi berhasil dikumpulkan dan disalurkan, sebagian diolah kembali menjadi produk kreatif oleh penyandang disabilitas melalui mitra yayasan, sehingga mendukung pemberdayaan ekonomi dan perpanjangan siklus hidup produk.



Capaian program tercermin dari peningkatan akses karyawan terhadap ruang belajar dan pengembangan diri, penguatan kesadaran akan pentingnya lingkungan kerja yang inklusif, serta dukungan nyata terhadap kelompok rentan di masyarakat. Melalui pendekatan ini, perusahaan tidak hanya mendorong peningkatan kapasitas dan kesejahteraan karyawan perempuan, tetapi juga menciptakan nilai bersama melalui kolaborasi sosial yang berkelanjutan. Rangkaian kegiatan *International Women's Day 2025* menjadi bagian dari komitmen jangka panjang perusahaan dalam mengelola dampak sosial secara bertanggung jawab dan mendukung pembangunan berkelanjutan.

Merdeka Celebrates International Women's Day 2025 with Inspiring Activities

In celebration of *International Women's Day 2025*, the Jakarta Head Office organized a series of internal activities under the theme *#AccelerateAction: Women's Spirit, Energy for Change*. The program aimed to strengthen an inclusive and gender-equitable workplace culture, enhancing the welfare, skills, and participation of women within the company. Activities were delivered through three main initiatives: personal development classes (*beauty class*), career development webinars, and a social donation program. All activities were funded through the company's internal budget as part of its human resources sustainability and social responsibility initiatives.

The direct beneficiaries of these activities included at least 42 female employees who participated in the personal development classes, as well as Merdeka Group employees who joined the career development webinars. Indirect benefits reached vulnerable groups outside the company, including people with disabilities, women, children, and underprivileged communities, through a clothing donation program. Over 800 items were collected and distributed, with some repurposed into creative products by people with disabilities through foundation partners, supporting both economic empowerment and the extension of product lifecycles.



The program's outcomes are evident in expanded employee access to learning and personal development opportunities, increased awareness of the importance of an inclusive workplace, and tangible support for vulnerable groups in the community. Through this approach, the company not only enhances the skills and welfare of female employees but also creates shared value through sustainable social collaboration. The *International Women's Day 2025* activities are part of the company's long-term commitment to responsibly managing social impacts and promoting sustainable development.

Anti-Diskriminasi dan Kesetaraan Gender [14.21.1]

Kebijakan Anti-Diskriminasi dan Kesetaraan Gender di Merdeka mencerminkan komitmen perusahaan terhadap proses perekrutan, penempatan, promosi, kompensasi, dan retensi karyawan yang didasarkan pada kualifikasi, termasuk pengalaman, prestasi, dan kriteria lainnya, tanpa adanya diskriminasi berdasarkan gender dan identitas.

Merdeka telah memiliki seorang perwakilan perempuan di tingkat direksi atau setara dengan 12,5% dari jumlah direksi pada tahun 2025. Untuk meningkatkan kesadaran karyawan, Merdeka melakukan sosialisasi Kebijakan Anti-Diskriminasi dan Kesetaraan Gender melalui email secara berkala kepada semua karyawan dan pelatihan Kode Etik.

Sepanjang Tahun 2025, tidak terdapat laporan pengaduan terkait dengan tindakan diskriminasi yang terjadi di Merdeka, entitas anak dan kontraktor. [406-1] [14.21.7]

Kebijakan Larangan Pekerja Anak

Kebijakan Larangan Pekerja Anak di Merdeka menegaskan komitmen perusahaan untuk mencegah pekerja anak di seluruh entitas anaknya. Merdeka secara tegas mematuhi Undang-Undang Ketenagakerjaan No. 13 Tahun 2003 Pasal 68 terkait usia minimum calon karyawan dan penghapusan pekerja anak, yang menjadi dasar dalam proses rekrutmen karyawan.

Departemen Sumber Daya Manusia Merdeka dan entitas anaknya melaksanakan prosedur verifikasi dokumen persyaratan calon pekerja, termasuk Surat Keterangan Catatan Kepolisian (SKCK), untuk memastikan bahwa usia pekerja sesuai ketentuan.

Berdasarkan prosedur tersebut, mekanisme pengaduan dan proses pemantauan, tidak ditemukan adanya karyawan yang berusia di bawah 18 tahun di Merdeka, entitas anak dan kontraktor. [F.19][408-1][14.17.9][14.18.1][14.18.2][414-1][14.17.9][414-2][14.17.10]

Cuti Melahirkan

Pada tahun 2025, sebanyak 20 karyawan perempuan telah memanfaatkan hak cuti melahirkan dan tidak ada karyawan laki-laki yang mengambil cuti ayah. Dari jumlah tersebut, sebanyak 16 karyawan (75%) kembali bekerja pada posisi semula setelah masa cuti berakhir, sementara sisanya masih menjalani masa cuti melahirkan.

Merdeka terus berkomitmen untuk meningkatkan fasilitas dan dukungan yang mendorong keseimbangan antara pekerjaan dan kehidupan keluarga bagi seluruh karyawan. [401-3] [14.17.5] [14.21.3]

Anti-Discrimination and Gender Equality

Merdeka's Anti-Discrimination and Gender Equality Policy reflects the Company's commitment to ensuring that recruitment, placement, promotion, compensation, and employee retention processes are based on qualifications, including experience, performance, and other relevant criteria, without discrimination based on gender or identity.

In 2025, Merdeka had one female representative at the Board of Directors level, equivalent to 12.5% of the total Board members. To increase employee awareness, Merdeka regularly communicates the Anti-Discrimination and Gender Equality Policy to all employees through periodic email communications and Code of Conduct training.

Throughout 2025, there were no reported complaints related to discrimination within Merdeka, its subsidiaries, or its contractors.

Child Labor Prohibition Policy

Merdeka's Child Labor Prohibition Policy affirms the Company's commitment to preventing child labor across all of its subsidiaries. Merdeka strictly complies with Indonesia's Manpower Law No. 13 of 2003, Article 68, which stipulates the minimum age for employment and the prohibition of child labor. This regulation serves as the basis for the Company's employee recruitment process.

The Human Resources Department of Merdeka and its subsidiaries implements document verification procedures for prospective employees, including verification of official identification and the Police Clearance Certificate, to ensure that all employees meet the minimum age requirements.

Based on these procedures, as well as the Company's grievance mechanisms and monitoring processes, no employees under the age of 18 were identified at Merdeka, its subsidiaries, or its contractors.

Maternity Leave

In 2025, a total of 20 female employees utilized their maternity leave entitlement, while no male employees took paternity leave. Of these employees, 16 (75%) returned to work in their previous positions after their leave ended, while the remaining employees were still on maternity leave at the end of the reporting period.

Merdeka remains committed to enhancing facilities and support that promote a healthy balance between work and family life for all employees.

Keterangan Description	Wanita Female			Laki-laki Male		
	2023	2024	2025	2023	2024	2025
Total karyawan yang berhak mendapat cuti melahirkan Total number of employees entitled to maternity leave	1,131	1,261	1,266	3,793	4,012	3,651
Total karyawan yang mengambil cuti melahirkan Total number of employees who took maternity leave	7	16	20	0	0	0
Total karyawan yang kembali bekerja pada periode pelaporan setelah cuti melahirkan berakhir Total number of employees who returned to work during the reporting period after maternity leave ended	7	16	20	0	0	0
Total karyawan yang kembali bekerja setelah cuti melahirkan berakhir dan masih bekerja setelah 12 bulan Total number of employees who returned to work after maternity leave and remained employed 12 months thereafter	5	12	16	0	0	0

Meningkatkan Keterampilan Karyawan

Pengembangan dan Pelatihan Karyawan

Merdeka secara konsisten melaksanakan program pengembangan kompetensi karyawan yang mencakup karyawan tetap maupun kontrak, dengan penekanan pada peningkatan soft skill dan technical skill untuk mendukung produktivitas dan kinerja yang berkelanjutan sesuai dengan *skill matrix* dan *training needs analysis*. Pelatihan yang diberikan juga menjadi bagian dari pendekatan perusahaan dalam mendukung keberlanjutan karir karyawan termasuk dalam mempersiapkan transisi pasca masa kerja. Sebagai bagian dari komitmen ini, program sertifikasi telah diterapkan untuk memperkuat kompetensi dan daya saing tenaga kerja.

Pada tahun 2025, Merdeka menginvestasikan dana sebesar USD 849.899 untuk mendukung program pelatihan dan pengembangan karyawan. Total durasi pelatihan yang diselenggarakan mencapai 129.135 jam, dengan rata-rata 9 jam pelatihan per karyawan per tahun. Angka ini mencerminkan dedikasi perusahaan dalam menciptakan lingkungan kerja yang mendukung pembelajaran berkelanjutan dan pengembangan individu.

Rata-Rata Jam Pelatihan Per Karyawan Berdasarkan Gender dan Level [F.22] [404-1] [404-2][14.17.7][14.21.4]

Average Training Hours per Employee by Gender and Level

Gender	Jam pelatihan karyawan Employee training hours	Jumlah karyawan Number of employees	Rerata jam pelatihan per karyawan Average training hours per employee
Laki-laki Male	110,836	137,59	8
Perempuan Female	18,299	1,253	15
Total	129,135	15,012	14

Enhancing Employee Skills

Employee Development and Training

Merdeka consistently implements employee competency development programs covering both permanent and contract employees, with a focus on enhancing soft skills and technical skills to support productivity and sustainable performance in line with the skill matrix and training needs analysis. The training provided also forms part of the Company's approach to supporting employees' long-term career sustainability, including preparation for post-employment transition. As part of this commitment, certification programs have been implemented to strengthen workforce competencies and competitiveness.

In 2025, Merdeka invested USD 849,899 to support employee training and development programs. The total training delivered reached 129,135 hours, with an average of 9 training hours per employee per year. These figures reflect the Company's commitment to fostering a work environment that supports continuous learning and individual development.

Level	Jam pelatihan karyawan Employee training hours	Jumlah karyawan Number of employees	Rerata jam pelatihan per karyawan Average training hours per employee
Senior Management	397	34	12
Manager, Superintendent and Supervisor	36,563	2,647	14
Staff and Non-Staff	92,175	12,331	7
Total	129,135	15,012	9

*Dihitung berdasarkan total partisipasi pada setiap kegiatan pelatihan; cakupan telah mencerminkan seluruh karyawan (100%) sebanyak 9.557 orang (GRI 2-7).
Calculated based on total participation in each training activity; coverage reflects all employees (100%), totaling 9,557 individuals (GRI 2-7).

Kepemimpinan [404-2] [202-2][404-2][202-2][14.8.3][14.9.6] [14.17.8][14.21.2]

Pada tahun 2025, Merdeka melaksanakan program pelatihan kepemimpinan yang diadakan di kantor pusat dan berbagai entitas anak. Program ini berhasil melibatkan 15.012 peserta, yang merupakan talenta terbaik dari seluruh entitas anak, dengan total durasi pelatihan mencapai 129.135 jam pelatihan. Peserta program terdiri dari karyawan tetap dan kontrak, mencerminkan komitmen Merdeka untuk membangun kapasitas kepemimpinan yang inklusif dan berkelanjutan di semua tingkatan organisasi.

Setiap entitas anak Merdeka yang berlokasi di Jawa Timur, Gorontalo, Maluku Barat Daya, Sulawesi Tenggara, dan Sulawesi Tengah dipimpin oleh seorang General Manager yang didukung oleh Senior Manager serta beberapa Manajer. Merdeka mendefinisikan posisi manajerial dari level Manajer hingga General Manager sebagai bagian dari manajemen senior.

Merdeka mengidentifikasi tenaga kerja lokal dalam manajemen senior sebagai individu yang memiliki Kartu Tanda Penduduk (KTP) dari wilayah operasional entitas anak. Hingga akhir tahun 2025, sebanyak 7 masyarakat lokal telah berhasil menduduki posisi manajemen.

Leadership Development

In 2025, Merdeka implemented a leadership development program conducted at the head office and across various business entities. The program involved 15,012 participants, representing top talents from all business entities, with a total training duration of 129,135 hours. Participants included both permanent and contract employees, reflecting Merdeka's commitment to building inclusive and sustainable leadership capacity across all levels of the organization.

Each of Merdeka's business entities located in East Java, Gorontalo, Southwest Maluku, Southeast Sulawesi, and Central Sulawesi is led by a General Manager, supported by a Senior Manager and several Managers. Merdeka defines managerial positions from Manager to General Manager as part of senior management.

Merdeka identifies local employees in senior management as individuals who hold a national identity card issued in the operational area of the respective subsidiary. As of the end of 2025, a total of 7 individuals from local communities held management positions.

Level Jabatan Position Level	Jumlah Karyawan Number of employees	Jumlah Karyawan lokal level manajer (yang berasal dari provinsi yang sama dengan lokasi site) Number of local employees (from the same province as the site location)	%
Senior Management	35	1	3%
Manager	86	6	7%

Merdeka LEAD Program: Menyiapkan Pemimpin yang Berdaya dan Profesional

Pada 3-5 Desember 2025, kembali Merdeka mengadakan program *Leadership Education and Development* (LEAD) tahun kedua yang diselenggarakan di *Head Office* Jakarta, sebagai upaya untuk memperkuat kompetensi kepemimpinan karyawan potensial. Program ini diikuti oleh 25 karyawan Merdeka group pada level *Assistant Manager* dan *Manager* yang berasal dari berbagai fungsi dan lokasi kerja, termasuk *Head Office* dan *site* operasional. Dibandingkan dengan pelaksanaan sebelumnya, program LEAD tahun ini dirancang dengan pendekatan yang lebih terfokus pada penerapan praktis, dengan menyesuaikan materi pembelajaran terhadap tantangan bisnis dan operasional yang dihadapi perusahaan saat ini. Pelaksanaan program dikoordinasikan oleh fungsi *HR Learning & Organization Development*, dengan dukungan fasilitator eksternal yang berpengalaman di bidang pengembangan kepemimpinan.

Program LEAD 2025 dilaksanakan melalui rangkaian sesi pembelajaran terstruktur yang mengangkat tema "*Own Your Leadership*", mencakup penguatan keterampilan kepemimpinan, komunikasi dan relasi interpersonal, pengambilan keputusan, serta pengembangan pola pikir perbaikan berkelanjutan dan inovasi. Metode pembelajaran mengombinasikan sesi kelas interaktif, diskusi kelompok, studi kasus, simulasi, serta penyusunan *Individual Development Plan* (IDP) sebagai acuan pengembangan peserta setelah program berakhir. Melalui inisiatif ini, Merdeka mendorong terciptanya kepemimpinan yang kolaboratif, adaptif, dan selaras dengan nilai keberlanjutan perusahaan, sekaligus memperkuat sinergi lintas fungsi dan kesiapan organisasi dalam menghadapi tantangan jangka panjang.

Merdeka LEAD Program: Preparing Empowered and Professional Leaders

From 3-5 December 2025, Merdeka conducted the second year of its *Leadership Education and Development* (LEAD) program at the *Head Office* in Jakarta as part of its efforts to strengthen the leadership capabilities of high-potential employees. The program was attended by 25 employees from the Merdeka Group at the *Assistant Manager* and *Manager* levels, representing various functions and work locations, including the *Head Office* and operational sites. Compared with the previous year, the 2025 LEAD program was designed with a stronger focus on practical application, aligning the learning materials with the current business and operational challenges faced by the Company. The program was coordinated by the *HR Learning & Organization Development* function, with support from external facilitators experienced in leadership development.

The LEAD 2025 program was delivered through a series of structured learning sessions under the theme "*Own Your Leadership*." The program focused on strengthening leadership capabilities, communication and interpersonal skills, decision-making, and the development of a mindset centered on continuous improvement and innovation. The learning approach combined interactive classroom sessions, group discussions, case studies, simulations, and the preparation of an *Individual Development Plan* (IDP) to guide participants' development after completing the program. Through this initiative, Merdeka aims to foster collaborative and adaptive leadership aligned with the Company's sustainability values, while strengthening cross-functional synergy and enhancing organizational readiness to address long-term challenges.



Penilaian Kinerja Karyawan

Program penilaian kinerja karyawan dilaksanakan setiap tahun untuk memastikan evaluasi yang komprehensif terhadap kontribusi setiap karyawan. Hasil penilaian ini menjadi acuan strategis dalam perencanaan program pelatihan, penyesuaian struktur remunerasi, dan pengambilan keputusan terkait promosi jabatan.

Pendekatan ini mencerminkan komitmen Merdeka terhadap pengelolaan sumber daya manusia yang berbasis pada kinerja dan pengembangan karier yang berkelanjutan.

Employee Performance Evaluation

The employee performance evaluation program is conducted annually to ensure a comprehensive assessment of each employee's contributions. The results of this evaluation serve as a key reference for planning training and development programs, adjusting remuneration structures, and making decisions related to promotions.

This approach reflects Merdeka's commitment to performance-based human resource management and the promotion of continuous career development.

Karyawan yang Menerima Penilaian Kinerja Berdasarkan Jenis Kelamin dan Level [404-3] [F.18][14.21.5] Employees Receiving Performance Evaluations by Gender and Level

Level	Laki-laki Male			Perempuan Female		
	Jumlah karyawan Number of employees [405-1]	Karyawan yang menerima penilaian kinerja Employees who received performance appraisals	%	Jumlah karyawan Number of employees [405-1]	Karyawan yang menerima penilaian kinerja Employees who received performance appraisals	%
Senior Management	97	78	80%	14	14	100%
Manager	137	127	93%	25	24	96%
Superintendent	360	273	76%	39	29	74%
Supervisor	1,062	971	91%	129	119	92%
Staff	1,640	1,035	63%	457	358	78%
Non-Staff	5,152	2,820	55%	445	149	33%
Total	8,448	5,304	63%	1,109	693	62%

Kompensasi dan Benefit

Merdeka berkomitmen untuk memberikan kompensasi yang menjadi hak setiap karyawan secara tepat waktu, sesuai dengan kinerja mereka dan peraturan pemerintah yang berlaku, termasuk Upah Minimum Sektor Provinsi (UMSP) Pertambangan dan Penggalian. Selain menerima gaji pokok, karyawan tetap dan karyawan kontrak juga mendapatkan berbagai *benefit* lainnya, termasuk Tunjangan Hari Raya (THR), BPJS Kesehatan, BPJS Ketenagakerjaan, cuti melahirkan, cuti tahunan, cuti dengan upah, tunjangan transportasi, bantuan pendidikan, santunan kematian, bantuan melahirkan, bantuan kacamata, cuti haid, tunjangan *shift* malam, uang saku *field break*, dan alat pelindung diri.

Selain itu, Merdeka memberikan bonus kepada karyawan di semua tingkatan, termasuk karyawan non-manajerial dan non-eksekutif, yang mencakup sebagian besar tenaga kerja, berdasarkan indikator kinerja individu serta kinerja perusahaan. Karyawan tetap juga memperoleh *benefit* berupa penghargaan masa kerja dan fasilitas telekomunikasi serta alat komunikasi sesuai dengan Perjanjian Kerja Bersama dan Peraturan Perusahaan. Untuk karyawan kontrak, Merdeka memberikan Uang Kompensasi sesuai dengan Peraturan Pemerintah No. 35 tahun 2021. [401-2] [14.17.4]

Compensation and Benefits

Merdeka is committed to providing employees with compensation in a timely manner, in accordance with their performance and applicable government regulations, including the Provincial Sectoral Minimum Wage (UMSP) for Mining and Quarrying. In addition to receiving a basic salary, both permanent and contract employees are entitled to various benefits, including the Religious Holiday Allowance, BPJS Health, BPJS Employment, maternity leave, annual leave, paid leave, transportation allowance, education assistance, death benefits, childbirth assistance, eyeglasses allowance, menstrual leave, night shift allowance, field break allowance, and personal protective equipment.

In addition, Merdeka provides bonuses to employees at all levels, including non-managerial and non-executive employees, covering the majority of the workforce, based on individual and company performance indicators. Permanent employees also receive additional benefits such as long-service awards and telecommunications and communication facilities in accordance with the Collective Labor Agreement and Company Regulations. For contract employees, Merdeka provides Compensation Pay in accordance with Government Regulation No. 35 of 2021.

Kompensasi dan *benefit* yang diberikan oleh Merdeka ditinjau secara tahunan berdasarkan evaluasi kinerja karyawan, kinerja perusahaan, serta survei kompensasi karyawan untuk memastikan bahwa paket remunerasi tetap kompetitif. Pemberian kompensasi di Merdeka juga mengacu pada standar upah minimum yang berlaku di wilayah kantor pusat Jakarta dan entitas anak untuk memastikan tingkat konsistensi dan daya saing yang tinggi di seluruh grup.

Penyelarasan skema kompensasi dan *benefit* di seluruh grup Merdeka menunjukkan tingkat standarisasi yang sangat baik. Merdeka telah menempatkan diri sebagai perusahaan yang mampu bersaing dengan perusahaan lain di industri sejenis. Karyawan dinilai dan dikompensasi berdasarkan posisi (*pay for position*) serta pencapaian kinerja (*pay for performance*). Selain itu, perusahaan secara berkesinambungan melakukan tinjauan dan pembaruan kebijakan terkait kompensasi dan *benefit* agar selalu relevan dengan perkembangan pasar.

Sebagai bagian dari upaya untuk terus meningkatkan kualitas penilaian kinerja, Merdeka menerapkan sistem otomatisasi penilaian kinerja dan *Key Performance Indicator* (KPI) yang lebih terintegrasi, mulai dari level kantor pusat hingga individu di seluruh grup Merdeka. Inisiatif ini bertujuan untuk meningkatkan efektivitas dan efisiensi dalam sistem penilaian kinerja, yang pada gilirannya akan mendukung pencapaian target perusahaan secara keseluruhan.

The compensation and benefits provided by Merdeka are reviewed annually based on employee performance evaluations, company performance, and employee compensation surveys to ensure that the remuneration package remains competitive. Compensation at Merdeka also refers to the applicable minimum wage standards in the Jakarta head office and its subsidiaries to ensure consistency and competitiveness across the Group.

The alignment of compensation and benefits across the Merdeka Group demonstrates a high level of standardization. Merdeka has positioned itself as a company capable of competing effectively with peers in the same industry. Employees are evaluated and compensated based on their position (*pay for position*) as well as their performance (*pay for performance*). The Company also continuously reviews and updates its compensation and benefits policies to ensure they remain relevant to market developments.

To further enhance the quality of performance evaluations, Merdeka has implemented an automated performance appraisal system and a more integrated Key Performance Indicator (KPI) framework, covering all levels from corporate to individual employees across the Group. This initiative aims to improve the effectiveness and efficiency of performance management, thereby supporting the achievement of the Company's overall objectives.

Perbandingan Kompensasi Karyawan Entry-Level dengan Upah Minimum [F.20] [202-1] [405-2]
Comparison of Entry-Level Employee Wages with Minimum Wages

Provinsi/ Kabupaten/ Kota Province/ Regency/ City	Upah minimum Provinsi/ Kabupaten/ Kota tahun 2025 Provincial/Regency/ City Minimum Wage in 2025 (IDR)	Gaji pokok karyawan terendah Perusahaan Lowest Basic Salary of Company Employees		Rasio terhadap upah minimum Ratio to minimum wage		Rasio upah pokok berdasarkan gender Basic Salary Ratio by Gender
		Laki-laki Male (IDR)	Perempuan Female (IDR)	Laki-laki Male	Perempuan Female	
Jakarta	5.396.761	5.396.761	6.000.000	100%	111%	111%
Banyuwangi	2.992.798	2.994.000	2.994.000	100%	100%	100%
Maluku	3.201.000	3.252.920	3.303.840	102%	103%	102%
Morowali	3.957.673	3.958.000	3.958.000	100%	100%	100%
Konawe	3.120.000	3.270.000	3.270.000	105%	105%	100%
Gorontalo	3.221.731	3.223.000	3.510.000	100%	109%	109%

Perbandingan Rasio Gaji Pokok Perempuan Dibanding dengan Pekerja Laki-Laki Berdasarkan Level [405-2]
Comparison of Female Basic Salary Ratio Compared to Male Employees by Level

Level	2023	2024	2025
Senior Management	135%	153%	108%
Manager	91%	95%	94%
Superintendent	89%	103%	101%
Supervisor	106%	103%	107%
Staff	94%	91%	93%
Non-Staff	95%	95%	95%

Cara perhitungan Rasio yaitu rata-rata gaji perempuan dibagi dengan rata-rata gaji laki-laki untuk masing-masing level/The ratio is calculated by dividing the average female salary by the average male salary for each level.

Merdeka berupaya memastikan struktur kompensasi dan tunjangan yang netral gender, sejalan dengan komitmennya terhadap kesetaraan dan keadilan. Pada tahun 2025, Merdeka melakukan analisis mendalam yang membandingkan kompensasi karyawan berdasarkan berbagai faktor, termasuk gender. Hasilnya menunjukkan bahwa perbedaan dalam kompensasi lebih disebabkan oleh faktor perbedaan tugas dan tanggungjawab bukan karena bias gender. Pendekatan ini menegaskan komitmen Merdeka dalam menerapkan praktik yang adil di seluruh lingkungan kerjanya.

Merdeka is committed to maintaining a gender-neutral compensation and benefits structure, in line with its principles of equality and fairness. In 2025, the Company conducted a comprehensive analysis of employee compensation across various factors, including gender. The results showed that any differences in compensation were primarily due to variations in roles and responsibilities, rather than gender bias. This approach highlights Merdeka's dedication to promoting fair and equitable practices across its entire work environment.

Program Pensiun [201-3]

Merdeka berkomitmen untuk memberikan jaminan kesejahteraan bagi karyawan, baik selama masa produktif maupun pasca purnakarya. Sebagai bentuk apresiasi atas dedikasi dan loyalitas karyawan, Perusahaan menyediakan Program Jaminan Pensiun bagi karyawan yang memasuki usia pensiun 56 tahun.

Pension Program

Merdeka is committed to ensuring the welfare of its employees, both during their active working years and after retirement. As a recognition of employees' dedication and loyalty, the Company provides a Pension Guarantee Program for employees reaching the retirement age of 56.

Program ini diselenggarakan sesuai dengan ketentuan BPJS Ketenagakerjaan dan diikuti oleh 9.557 (100%) karyawan, di mana iuran sebesar 1% dari gaji ditanggung oleh karyawan dan 2% ditanggung oleh Perusahaan. Skema ini bertujuan untuk memastikan karyawan dapat memenuhi kebutuhan hidupnya dengan layak setelah pensiun. Program pensiun dilakukan 12 bulan sebelum masa pensiun. Sebanyak 19 karyawan telah mengikuti program pensiun tahun 2025.

This program is implemented in accordance with the provisions of BPJS Ketenagakerjaan and is participated in by 9,557 employees (100%), with contributions of 1% of salary borne by employees and 2% borne by the Company. The scheme aims to ensure that employees can meet their living needs adequately after retirement. The retirement program is conducted 12 months prior to the retirement date, and 19 employees participated in the program in 2025.

Fasilitas olahraga

Untuk meningkatkan kesehatan fisik dan mental karyawan, Merdeka melaksanakan program olahraga, seperti bola basket, futsal, tenis meja, badminton, dan lari. Di setiap entitas anaknya, Merdeka juga menyediakan berbagai fasilitas bagi karyawan Merdeka dan karyawan mitra bisnis. Fasilitas tersebut meliputi fasilitas olahraga, klinik kesehatan, dan tempat ibadah, memastikan pendekatan yang komprehensif terhadap kesejahteraan karyawan.

Sports Facilities

To support the physical and mental well-being of employees, Merdeka offers various sports programs, including basketball, futsal, table tennis, badminton, and running. At each of its subsidiaries, Merdeka also provides a range of facilities for both its employees and those of business partners. These include sports facilities, health clinics, and places of worship, reflecting a comprehensive approach to employee well-being.



Penguatan Kesehatan dan Kesejahteraan Karyawan melalui Program NALURI

Selama tahun pelaporan, Merdeka mengimplementasikan Program NALURI sebagai platform digital *wellness* yang berfokus pada peningkatan kondisi dan kapasitas penerima manfaat. Melalui program ini, karyawan memperoleh akses terstruktur terhadap dukungan kesehatan fisik, kesehatan mental dan emosional, pengelolaan keuangan, serta pengembangan pribadi dan profesional, yang secara langsung berkontribusi pada peningkatan keseimbangan hidup dan kinerja kerja.

Seiring berjalannya program, NALURI dimanfaatkan oleh karyawan melalui layanan *coaching* dan konsultasi yang diberikan oleh tenaga profesional, termasuk psikolog, penasihat medis, perencana keuangan, pelatih kebugaran, dan ahli gizi. Pendekatan individual dan bersifat rahasia memungkinkan karyawan untuk mengelola tantangan personal secara lebih efektif, memperkuat ketahanan (*resilience*), serta meningkatkan pengambilan keputusan terkait kesehatan dan kesejahteraan. Pengelolaan data dilakukan oleh pihak ketiga yang kompeten untuk memastikan keamanan dan kerahasiaan informasi, sehingga mendorong tingkat kepercayaan dan partisipasi karyawan yang berkelanjutan.

Enhancing Employee Health and Well-Being through the NALURI Program

During the reporting year, Merdeka implemented the NALURI Program, a digital wellness platform aimed at improving the health, well-being, and capacity of its employees. Through this program, employees have structured access to support in physical health, mental and emotional well-being, financial management, and personal and professional development, all of which contribute directly to better work-life balance and improved job performance.

Employees participate in NALURI through coaching and consultations provided by qualified professionals, including psychologists, medical advisors, financial planners, fitness coaches, and nutritionists. The individualized and confidential approach enables employees to address personal challenges more effectively, strengthen resilience, and make better decisions regarding their health and well-being. Data management is handled by a competent third party to ensure information security and confidentiality, fostering trust and sustained employee engagement.

Survei Efektivitas/ Kepuasan Karyawan

Merdeka telah melaksanakan serangkaian program pelibatan karyawan sebagai bagian dari komitmen perusahaan untuk menciptakan lingkungan kerja yang inklusif dan produktif. Salah satu inisiatif utama adalah Survei Efektivitas & Kepuasan Karyawan yang dilakukan setiap tahun, yang dirancang untuk mencakup karyawan tetap dan kontrak dengan masa kerja minimal 6 bulan atau lebih. Survei ini bertujuan untuk mengukur efektivitas, keterlibatan, dan kepuasan karyawan terhadap berbagai aspek pekerjaan mereka.

Hasil dari *engagement score* Merdeka menunjukkan capaian yang tinggi, tidak hanya jika dibandingkan dengan perusahaan lain di industri yang sama, tetapi juga dengan perusahaan yang termasuk dalam kategori perusahaan dengan kinerja tinggi. Pencapaian ini mencerminkan efektivitas inisiatif perusahaan dalam mendukung karyawan dan memperkuat budaya kerja yang mendorong kinerja optimal.

Employee Effectiveness and Satisfaction Survey

Merdeka has implemented a range of employee engagement programs as part of its commitment to fostering an inclusive and productive work environment. One of the key initiatives is the Employee Effectiveness and Satisfaction Survey, conducted annually and covering both permanent and contract employees with a minimum tenure of six months. The survey is designed to assess employee effectiveness, engagement, and satisfaction across various aspects of their work.

Merdeka's engagement score demonstrates strong performance, not only compared with companies in the same industry but also with organizations classified as high-performing companies. This achievement reflects the effectiveness of the Company's initiatives in supporting employees and strengthening a work culture that encourages optimal performance.



* Employees at Merdeka Head Office celebrate Indonesia's Independence Day

Hubungan Industrial

Serikat Pekerja

Sesuai dengan Kebijakan Hak Asasi Manusia Merdeka perusahaan memberikan kesempatan kepada para karyawan untuk menjadi anggota Serikat Pekerja. Melalui organisasi ini, karyawan dapat menyampaikan aspirasi dan mengajukan usulan perbaikan atau program kepada manajemen.

Serikat Pekerja dibentuk dari, oleh, dan untuk karyawan dengan prinsip yang bebas, terbuka, mandiri, demokratis, dan bertanggung jawab. Organisasi ini bertujuan untuk memperjuangkan, membela dan melindungi hak karyawan, serta meningkatkan kesejahteraan mereka. [407-1] [14.20.1]

Perjanjian Kerja Bersama dan Peraturan Perusahaan

Merdeka menjunjung tinggi kewajiban untuk menjaga hubungan industrial yang harmonis dan bertanggung jawab. Perjanjian Kerja Bersama (PKB) merupakan hasil perundingan antara serikat pekerja dan perusahaan yang didasarkan pada itikad baik dan saling menghargai. Melalui PKB, Merdeka dan karyawan membangun ikatan kekeluargaan yang disusun dan disepakati bersama.

Dokumen tersebut memuat syarat-syarat kerja, hak, dan kewajiban kedua belah pihak. Dengan pendekatan ini, tidak terdapat mogok kerja atau *lockout* yang melibatkan karyawan dan menyebabkan penutupan operasi perusahaan secara signifikan pada tahun 2025. [14.20.3]

Hingga akhir tahun 2025, Serikat Pekerja Tambang Emas Tujuh Bukit memiliki 1.113 anggota, yang mewakili 89.2% dari total tenaga kerja. Sementara itu, Serikat Pekerja Tambang Tembaga Wetar memiliki 549 anggota, mencakup 65% dari total karyawannya. Perjanjian Kerja Bersama (PKB) di Tambang Emas Tujuh Bukit berlaku sejak 2025 hingga 2027. [2-30][14.20.1]

Tambang Emas Pani, Pabrik AIM, dan Tambang Nikel Konawe belum membentuk serikat pekerja namun telah memiliki Peraturan Perusahaan, LKS Bipartit, dan forum keterlibatan karyawan. Di kantor pusat, telah dibentuk Lembaga Kerja Sama Bipartit untuk memfasilitasi dialog antara karyawan dan manajemen. Hingga tahun 2025, tidak terdapat operasi Merdeka dan kontraktor yang berisiko terhadap pelanggaran hak kebebasan berserikat. [407-1] [14.20.2]

PKB untuk BSI dan Wetar mengatur prosedur Pemutusan Hubungan Kerja (PHK) pada Bab XII, yang menyatakan bahwa karyawan akan diinformasikan secara tertulis paling lama 14 hari kerja sebelum tanggal PHK.

Selain itu, di kantor pusat, Merdeka memiliki Peraturan Perusahaan No.KEP. 4/HI.00.00/00.0000.251202020/P-1/I/2026 yang mengatur bahwa apabila ada restrukturisasi dan reorganisasi atau perubahan lain yang mengakibatkan PHK, karyawan akan diberitahukan selambat-lambatnya 14 hari sebelumnya. Untuk Karyawan Kontrak, Merdeka akan memberikan sisa kontrak dan kompensasi, sedangkan untuk

Industrial Relations

Labor Union

In accordance with Merdeka's Human Rights Policy, the Company provides employees with the opportunity to join a labor union. Through this organization, employees can express their aspirations and submit suggestions for improvements or programs to management.

The labor union is established by and for employees and operates based on the principles of freedom, openness, independence, democracy, and accountability. The organization aims to advocate for, defend, and protect employees' rights, while also promoting their welfare.

Collective Labor Agreement and Company Regulation

Merdeka is committed to maintaining harmonious and responsible industrial relations. The Collective Labor Agreement (CLA) is the result of negotiations between the labor union and the Company, conducted in good faith and based on mutual respect. Through the CLA, Merdeka and its employees establish a cooperative relationship that is jointly developed and agreed upon.

The agreement outlines the terms and conditions of employment, as well as the rights and obligations of both parties. Through this approach, there were no strikes or lockouts involving employees that resulted in significant disruptions to the Company's operations in 2025.

As of the end of 2025, the Tujuh Bukit Gold Mine Labor Union had 1,113 members, representing 89% of the total workforce. Meanwhile, the Wetar Copper Mine Labor Union has 549 members, representing 65% of its total employees. The Collective Labor Agreement (Perjanjian Kerja Bersama/PKB) at Tujuh Bukit Gold Mine is effective from 2025 to 2027.

The Pani Gold Mine, AIM Plant, and Konawe Nickel Mine have not yet established labor unions; however, they have established Company Regulation, Bipartite Cooperation Institutions, and employee engagement forums. At the Head Office, a Bipartite Cooperation Institution has also been established to facilitate dialogue between employees and management. As of 2025, there were no Merdeka's operations or contractors identified as being at risk of violating the right to freedom of association.

The PKB for BSI and Wetar regulates termination of employment procedures in Chapter XII, which states that employees will be notified in writing at least 14 working days prior to the effective date of termination.

In addition, at the Head Office, Merdeka has Company Regulations No.KEP. 4/HI.00.00/00.0000.251202020/P-1/I/2026 stating that in the event of restructuring, reorganization, or other changes that may result in termination of employment, employees will be notified at least 14 days in advance. For contract employees, Merdeka provides the remaining contract value and compensation,

karyawan tetap akan mendapatkan uang pesangon, uang penghargaan masa kerja, uang penggantian hak dan uang pisah. [402-1] [14.8.2] [14.17.6]

Pada tahun 2025, seluruh (100%) karyawan Merdeka, baik karyawan tetap, karyawan kontrak, maupun karyawan yang tergabung atau tidak tergabung dalam serikat pekerja, dilindungi oleh Perjanjian Kerja Bersama.

Merdeka juga telah menyusun Peraturan Perusahaan yang telah disetujui oleh Menteri Ketenagakerjaan, mengatur ketentuan ketenagakerjaan untuk karyawan di kantor pusat Merdeka. Peraturan tersebut mencakup ketentuan mengenai hari kerja, jam kerja (40 jam per minggu), jam istirahat (1 jam), dan batas maksimum jam lembur.

while permanent employees are entitled to severance pay, long-service awards, compensation for entitlements, and separation pay, in accordance with applicable regulations.

In 2025, all (100%) Merdeka employees, including permanent employees, contract employees, and employees who are either members or non-members of labor unions, were covered by a Collective Labor Agreement.

Merdeka has also established Company Regulations, approved by the Minister of Manpower, that govern employment conditions for employees at the Merdeka Head Office. These regulations include provisions on working days, working hours (40 hours per week), rest periods (1 hour), and the maximum allowable overtime hours.



Employees at Merdeka's operational sites celebrate Independence Day

Makan Siang dan Kopi Sore dengan Direksi

Lunch dan Afternoon Coffee with BoD



Program *Lunch with BOD* merupakan kegiatan internal karyawan yang dirancang sebagai forum dialog terbuka antara Direksi dan karyawan lintas fungsi dan level. Pada tahun 2025, kegiatan ini dilaksanakan dua kali, yaitu pada 25 Juni 2025 dan 13 November 2025 di Kantor Pusat Jakarta. Program ini bertujuan memperkuat komunikasi dua arah, meningkatkan pemahaman karyawan terhadap arah strategis perusahaan, serta membangun keterlibatan karyawan sebagai fondasi keberlanjutan organisasi. Kegiatan dilaksanakan dalam format makan siang bersama dan diskusi interaktif, dengan pendanaan berasal dari anggaran internal perusahaan sebagai bagian dari pengelolaan sumber daya manusia yang berkelanjutan.

Peserta kegiatan merupakan karyawan dari berbagai fungsi dan jenjang jabatan, mulai dari *Officer* hingga *Manager*, dengan prioritas bagi karyawan yang belum pernah mengikuti sesi sebelumnya. Pada pelaksanaan 25 Juni 2025, sesi dihadiri oleh tiga Direksi Grup Merdeka, yaitu Direktur HR, Presiden Direktur entitas anak, dan Direktur operasional *site*. Diskusi berfokus pada pengembangan bisnis nikel dalam rantai pasok kendaraan listrik, pentingnya kolaborasi antara kantor pusat dan *site*, serta komitmen perusahaan terhadap kesejahteraan dan pengembangan karyawan.

Sementara itu, sesi 13 November 2025 menghadirkan jajaran Presiden Direktur dari beberapa entitas Grup Merdeka dan membahas kesiapan perusahaan menghadapi tantangan global, keselamatan kerja, serta penguatan praktik pertambangan yang bertanggung jawab.

The Lunch with the Board of Directors (BoD) program is an internal initiative designed to provide an open dialogue forum between the Board of Directors and employees from various functions and levels within the Company. In 2025, the program was held twice on 25 June 2025 and 13 November 2025 at the Head Office in Jakarta. The initiative aims to strengthen two-way communication, enhance employees' understanding of the Company's strategic direction, and foster employee engagement as a foundation for organizational sustainability.

Participants in the program included employees from various functions and job levels, ranging from Officers to Managers, with priority given to those who had not previously attended the session. The session held on 25 June 2025 was attended by three members of the Merdeka Group's Board of Directors: the Director of Human Resources, the President Director of a subsidiary, and the Site Operations Director. The discussion focused on the development of the nickel business within the electric vehicle supply chain, the importance of collaboration between the head office and operational sites, and the Company's commitment to employee welfare and development.

Meanwhile, the session on 13 November 2025 featured several President Directors from entities within the Merdeka Group and discussed the Company's readiness to address global challenges, workplace safety, and the strengthening of responsible mining practices.



Manfaat program ini terutama dirasakan oleh karyawan sebagai penerima manfaat langsung melalui peningkatan akses terhadap informasi strategis, kepemimpinan, dan arah kebijakan perusahaan. Secara tidak langsung, penguatan kapasitas karyawan berkontribusi pada peningkatan kinerja operasional yang berdampak pada keberlanjutan usaha dan kesejahteraan pemangku kepentingan yang lebih luas, termasuk masyarakat sekitar wilayah operasi.

Diskusi juga mencakup isu pengembangan talenta, retensi karyawan, pendidikan berkelanjutan, dan keselamatan kerja, yang relevan bagi kelompok perempuan, generasi muda profesional, serta kelompok karyawan di *site* dengan tantangan operasional tinggi.

Capaian utama dari *program Lunch with BOD* terlihat pada meningkatnya partisipasi dan keterbukaan karyawan dalam menyampaikan aspirasi, ide, dan masukan strategis kepada manajemen. Forum ini memperkuat pemahaman bersama mengenai pentingnya efisiensi biaya dan praktik pertambangan yang bertanggung jawab, pengembangan talenta melalui program *High Potential Employees* dan beasiswa pendidikan, serta prioritas keselamatan kerja sebagai indikator keberhasilan operasional.

Melalui pendekatan ini, *Lunch with BOD* berperan sebagai mekanisme penguatan tata kelola sosial internal, mendukung keberlanjutan bisnis jangka panjang, dan menciptakan nilai bersama antara manajemen, karyawan, dan pemangku kepentingan perusahaan.

The primary beneficiaries of this program are employees, who gain improved access to strategic information, leadership perspectives, and the Company's policy direction. Indirectly, strengthening employee capacity contributes to improved operational performance, which supports business sustainability and benefits a broader range of stakeholders, including communities surrounding the Company's operational areas.

The discussions also addressed topics such as talent development, employee retention, continuous learning, and workplace safety. These topics are particularly relevant for women, young professionals, and employees working at operational sites with higher operational challenges.

The key outcomes of the Lunch with the BoD program are reflected in the increased participation and openness of employees in expressing their aspirations, ideas, and strategic input to management. This forum has strengthened shared understanding regarding the importance of cost efficiency and responsible mining practices, talent development through High Potential Employee programs and educational scholarships, as well as workplace safety as a key indicator of operational success.

Through this approach, the Lunch with the BoD program serves as a mechanism to strengthen internal social governance, support long-term business sustainability, and create shared value among management, employees, and the Company's stakeholders.

Mekanisme Keluhan [2-25][2-26][403-2][14.16.3]

Kebijakan Speaking Up dan Anti-Pembalasan Merdeka dirancang sebagai pedoman bagi Direksi dan karyawan untuk menyampaikan pertanyaan atau melaporkan pelanggaran dengan itikad baik sesuai prosedur yang telah ditetapkan. Kebijakan ini menjamin bahwa pelapor tidak akan mengalami pembalasan atas laporan yang disampaikan, menciptakan budaya keterbukaan, akuntabilitas, dan integritas di perusahaan.

Merdeka mendorong karyawan dan kontaktor untuk menyampaikan pengaduan atau pertanyaan melalui Sistem Pelaporan Pelanggaran (WBS) melalui <https://Merdeka.whispli.com/SpeakUp> atau WhatsApp: +62 812 5000 1018, yang dikelola oleh konsultan independen. Selain itu, panduan sistem *whistleblowing* dapat diakses melalui situs web: [Merdeka Copper Gold – Documents](#).

Proses pelaporan dimulai dengan pelapor menyampaikan laporan pengaduan melalui saluran yang tersedia. Setelah itu, konsultan akan melakukan konfirmasi dan berkomunikasi dengan pelapor terkait materi pengaduan yang disampaikan.

Konsultan independen kemudian merangkum laporan pengaduan dan mengirimkannya kepada Kepala Internal Audit dan Kepala Hubungan Industrial, kecuali:

1. Jika pihak yang diadukan adalah Kepala Internal Audit dan Kepala Hubungan Industrial, maka laporan tersebut disampaikan kepada Direktur SDM.
2. Apabila yang diadukan adalah Direktur SDM, laporan diteruskan kepada Presiden Direktur.
3. Jika yang diadukan adalah Presiden Direktur, laporan akan disampaikan kepada Komite Audit.

Penerima laporan bertugas menindaklanjuti pengaduan dengan berkoordinasi dengan divisi terkait. Laporan pengaduan dianggap selesai apabila:

1. Proses tindak lanjut telah diselesaikan oleh pihak yang bertanggung jawab.
2. Tindak lanjut tersebut memenuhi harapan pelapor.
3. Tidak terdapat bukti atau informasi yang memadai untuk melanjutkan pengaduan.
4. Tidak ada respons dari pelapor atas permintaan tambahan informasi atau bukti oleh konsultan independen dalam waktu 15 hari kerja sejak permintaan disampaikan.

Merdeka secara periodik menyosialisasikan saluran WBS melalui email dan pelatihan Kode Etik kepada seluruh karyawan. Selama tahun 2025, tidak terdapat laporan yang mengarah pada indikasi kerja anak dan kerja paksa di Merdeka dan kontraktor. [408-1][14.18.2][409-1][14.19.2]

Grievance Mechanism

Merdeka's Speaking Up and Anti-Retaliation Policy serves as a guideline for the Board of Directors and employees to raise questions or report suspected violations in good faith, in accordance with established procedures. The policy ensures that individuals who submit reports are protected from retaliation, thereby fostering a culture of openness, accountability, and integrity within the Company.

Merdeka encourages employees and contractors to submit complaints or inquiries through the Whistleblowing System (WBS) at <https://Merdeka.whispli.com/SpeakUp> or via WhatsApp: +62 812 5000 1018, which is managed by an independent consultant. In addition, guidance on the whistleblowing system is available on the Company's website under [Merdeka Copper Gold – Documents](#).

The reporting process begins when the reporter submits a complaint through the available reporting channels. The consultant then confirms receipt of the report and communicates with the reporter regarding the details of the complaint submitted.

The independent consultant subsequently summarizes the complaint and forwards it to the Head of Internal Audit and the Head of Industrial Relations, except in the following circumstances:

1. If the reported party is the Head of Internal Audit or the Head of Industrial Relations, the report will be submitted to the HR Director.
2. If the reported party is the HR Director, the report will be forwarded to the President Director.
3. If the reported party is the President Director, the report will be submitted to the Audit Committee.

The report recipient is responsible for following up on the complaint by coordinating with the relevant divisions. A complaint is considered resolved when:

1. The follow-up process has been completed by the responsible party.
2. The actions taken adequately address the reporter's concerns.
3. There is insufficient evidence or information to proceed with the complaint.
4. The reporter does not respond to requests for additional information or evidence from the independent consultant within 15 working days from the date the request was made.

Merdeka periodically communicates the availability of the Whistleblowing System (WBS) channels through email and Code of Conduct training provided to all employees. Throughout 2025, there were no reports indicating the presence of child labor and forced labor within the Merdeka and contractors.



▲ Employee engagement event at SCM

Caring for Communities

Memperhatikan Masyarakat



▲ Rumah Pintar inauguration at BSI

2025 Performance

Community Grievance Mechanism

All community complaints (100%) were followed up

Community Development and Empowerment Programs

> In 2025, disbursed funds for community development and empowerment programs reached USD5.69 million

> The eight pillars of the community empowerment program were implemented in accordance with government regulations

Community Engagement

Conducted monthly meetings with the the community at BSI, BKP-BTR, SCM, and MTI

2026 Target

Community Grievance Mechanism

Ensure 100% of community complaints are followed up

Community Development and Empowerment Programs

Ensure the implementation of the eight pillars of the community empowerment program in accordance with government regulations, supported by adequate funding

Community Engagement

Ensure regular meetings are conducted with the community at BSI, BKP-BTR, SCM, and MTI



Memperhatikan Masyarakat Caring for Communities

Keberlanjutan operasional perusahaan pertambangan sangat bergantung pada kualitas hubungan yang dibangun dengan masyarakat di sekitar wilayah operasi. Dukungan dan partisipasi masyarakat memegang peran penting dalam memitigasi risiko sosial, meningkatkan penerimaan terhadap kegiatan operasional, serta menciptakan nilai bersama. Oleh karena itu, Merdeka berkomitmen untuk melibatkan masyarakat secara aktif dalam setiap tahapan operasional perusahaan, dengan tetap mengacu pada regulasi pemerintah yang berlaku serta standar internasional yang relevan.

Kebijakan Masyarakat menjadi panduan bagi Merdeka, entitas anak, dan kontraktor dalam melaksanakan kinerja sosial. Komitmen Merdeka mencakup kepatuhan dan penghormatan terhadap hukum dan peraturan yang berlaku, serta pengakuan dan penghormatan terhadap warisan budaya, keyakinan, dan nilai-nilai masyarakat adat apabila teridentifikasi berada di wilayah atau sekitar wilayah operasi Merdeka. [14.11.1]

Merdeka berkomitmen untuk mengakui, menghormati, dan melindungi kelompok rentan yang berpotensi terdampak oleh kegiatan operasional, termasuk perempuan, anak-anak, kelompok agama dan etnis minoritas, serta penyandang disabilitas. Untuk itu, Merdeka mengimplementasikan mekanisme konsultasi dan pelibatan pemangku kepentingan guna menindaklanjuti hak, kepentingan, dan keluhan mereka. Selain itu, Merdeka mendorong transparansi dan keterbukaan

The sustainability of mining operations is closely linked to the quality of relationships built with communities surrounding the operational areas. Community support and participation play a crucial role in mitigating social risks, enhancing acceptance of operational activities, and creating shared value. Accordingly, Merdeka is committed to actively engaging communities at every stage of its operations, in compliance with applicable government regulations and relevant international standards.

Merdeka's Community Policy serves as a framework for the company, its subsidiaries, and contractors in implementing social initiatives. This commitment includes adherence to applicable laws and regulations while also respecting the cultural heritage, beliefs, and values of indigenous, where identified as being located within or around Merdeka's operational areas.

Merdeka is committed to recognizing, respecting, and protecting vulnerable groups that may be impacted by its operational activities, including women, children, religious and ethnic minorities, and persons with disabilities. To this end, Merdeka implements consultation and stakeholder engagement mechanisms to address their rights, interests, and grievances. In addition, Merdeka promotes transparency and open communication in its interactions with local

dalam komunikasi serta interaksi dengan pemerintah daerah, masyarakat, dan para pemangku kepentingan lainnya untuk mengatasi isu-isu sosial dan mencapai solusi yang saling menguntungkan.

Dalam upayanya untuk memberdayakan masyarakat, Merdeka berkomitmen untuk melaksanakan Program Pengembangan dan Pemberdayaan Masyarakat (PPM) yang menghargai budaya setempat dan mengutamakan prinsip keadilan. Program ini dirancang untuk memberikan manfaat sosial-ekonomi yang positif bagi masyarakat lokal. Merdeka juga mendorong entitas anak untuk berkontribusi dalam pengembangan ekonomi lokal melalui pengadaan barang dan jasa secara lokal serta memprioritaskan kesempatan kerja bagi masyarakat setempat.

Merdeka menjunjung tinggi penghormatan terhadap hak asasi manusia dengan secara berkala mengevaluasi dampak potensial dan aktual dari kegiatan operasional entitas anak terhadap masyarakat lokal. Merdeka juga menerapkan langkah-langkah untuk mengurangi dampak sosial serta menangani konsekuensi yang mungkin timbul. Selain itu, Merdeka menyediakan mekanisme penyampaian pengaduan yang efektif bagi masyarakat terdampak dan mendorong kontraktor untuk menjalin hubungan yang harmonis dengan masyarakat lokal serta menghindari konflik dan penggunaan kekerasan di wilayah operasional.

Dalam pelaksanaan program sosial, Kepala Teknik Tambang (KTT) dan General Manager entitas anak bertanggung jawab untuk mengimplementasikan program serta melaporkan kinerja sosial kepada Direksi. Sementara itu, Ketua Komite Keberlanjutan, bertanggung jawab dalam menetapkan strategi serta mengawasi kinerja sosial perusahaan.

Penilaian Dampak dan Pelibatan Pemangku Kepentingan

[F.23] [2-16] [2-29] [411-1] [413-1] [14.10.1]

[14.10.2][14.12.1]

Untuk memastikan pengelolaan dampak sosial yang bertanggung jawab, Merdeka mewajibkan setiap entitas anak untuk secara proaktif dan berkala mengidentifikasi serta menilai dampak sosial berdasarkan prinsip kehati-hatian dan Standar Penilaian Dampak Sosial. Penilaian ini dilakukan oleh Divisi *Community* dan dilaporkan kepada Kepala Teknik Tambang (KTT) atau *General Manager*. Sebagai bagian dari kepatuhan regulasi, Merdeka telah melaksanakan evaluasi Analisis Mengenai Dampak Lingkungan (AMDAL), termasuk dampak sosial, dan Pemetaan Sosial terhadap seluruh (100%) wilayah operasional perusahaan, serta memastikan keterlibatan masyarakat terdampak sejak tahap awal setiap proyek.

Standar Penilaian Rona Awal dan Dampak Sosial menjadi pedoman bagi entitas anak Merdeka dalam menyusun penilaian rona awal serta analisis dampak dari operasional tambang di wilayahnya, khususnya pada tahap awal sebelum proyek dilaksanakan. Hasil kajian ini akan menjadi dasar dalam menyusun rencana tindak lanjut guna meminimalkan dampak negatif terhadap masyarakat.

governments, communities, and other stakeholders to address social issues and achieve mutually beneficial solutions.

As part of its community empowerment efforts, Merdeka is committed to implementing the Community Development and Empowerment Program (CDE), which respects local culture and upholds the principles of fairness. This program is designed to generate positive socio-economic benefits for local communities. The company also encourages its subsidiaries to support local economic development by prioritizing local procurement and employment opportunities.

Merdeka upholds human rights by regularly evaluating the potential and actual impacts of its business operations on local communities. The company takes proactive measures to mitigate social impacts and address any arising issues. Furthermore, Merdeka provides an effective grievance mechanism for affected communities and encourages its contractors to build positive relationships with local stakeholders while avoiding conflict or the use of force in operational areas.

For the implementation of social programs, the Head of Technical Mining (KTT) and the General Manager of each subsidiary is responsible for execution and reporting social performance to the Board of Directors. Meanwhile, the Chair of the Sustainability Committee, is responsible for setting strategic direction and overseeing the company's social performance.

Impact Assessment and Stakeholder Engagement

To ensure responsible management of social impacts, Merdeka requires each subsidiary to proactively and periodically identify and assess social impacts based on the precautionary principle and the Social Impact Assessment Standard. These assessments are conducted by the Community Division and reported to the Head of Technical Mining (KTT) or the General Manager. As part of regulatory compliance, Merdeka has carried out Environmental Impact Assessments, including social impact evaluations, as well as Social Mapping across all (100%) Company's operational areas, and ensures the involvement of affected communities from the early stages of each project.

The Social Baseline and Impact Assessment Standard guide Merdeka's subsidiaries in conducting baseline assessments and analyzing the potential impacts of mining operations in their respective areas, particularly during the early stages before project implementation. The results of this assessment will form the basis for developing follow-up action plans to minimize negative impacts on local communities.



Village Leaders and Village Committee meeting at SCM Site

Untuk pelibatan pemangku kepentingan, entitas anak Merdeka menerapkan Standar Bina Relasi Pemangku Kepentingan yang merujuk pada *Stakeholder Engagement Standard AA1000 SES*.

Dalam proses identifikasi dampak, Merdeka melibatkan berbagai pemangku kepentingan, termasuk masyarakat lokal, petani, nelayan, perempuan, kelompok agama dan etnis minoritas, pemerintah daerah, serta organisasi masyarakat sipil yang bergerak di bidang lingkungan dan sosial. Sesuai dengan Kebijakan Masyarakat dan Kebijakan Hak Asasi Manusia Merdeka, pelibatan ini bertujuan untuk memastikan dialog yang terbuka dan transparan dengan masyarakat sekitar wilayah operasi guna mengatasi potensi konflik dan menghindari kekerasan. Sebagai catatan, tidak terdapat sengketa lahan akibat operasi perusahaan pada tahun 2025. [14.11.2][14.12.2][14.12.3]

Pelibatan pemangku kepentingan ini dilakukan melalui berbagai metode, termasuk pemetaan pemangku kepentingan, konsultasi publik, diskusi kelompok terarah yang memfasilitasi diskusi dengan kelompok-kelompok masyarakat spesifik, misalnya, kelompok perempuan, kelompok petani, untuk menggali informasi lebih dalam tentang potensi dampak dan kebutuhan mereka, wawancara mendalam dengan para ahli, studi data sekunder dari berbagai sumber terpercaya, observasi lapangan untuk memperoleh gambaran komprehensif, serta penyebaran kuesioner untuk mengumpulkan data kuantitatif. Berbagai pendekatan ini memastikan bahwa seluruh dampak sosial dan lingkungan akibat kegiatan operasional dapat diidentifikasi dan dikelola dengan baik. Merdeka juga menyosialisasikan hasil penilaian kepada pemangku kepentingan yang terdampak.

For stakeholder engagement, the company follows its Stakeholder Engagement Standards, which align with the AA1000 SES Stakeholder Engagement Standard.

During the impact identification process, Merdeka engages various stakeholders, including local communities living near its subsidiary's operation, farmers, fishermen, women, religious and ethnic minorities, local governments, and civil society organizations focused on environmental and social issues. In line with its Community Policy and Human Rights Policy, Merdeka ensures open and transparent dialogue with affected communities to prevent conflict and promote peaceful engagement. As of 2025, there have been no land disputes resulting from company operations.

Stakeholder engagement is conducted through various methods, including stakeholder mapping, public consultations, and focus group discussions with specific community groups, such as women's groups and farmers, to better understand their concerns and needs. Additional approaches include in-depth interviews with experts, secondary data studies from credible sources, field observations, and surveys to collect quantitative data. These comprehensive efforts ensure that all social and environmental impacts from operational activities are properly identified and managed. Merdeka also communicates assessment results to affected stakeholders.

Merdeka Berkolaborasi dengan BAZNAS untuk Mendukung Korban Banjir dan Tanah Longsor di Sumatra Merdeka Collaborates with BAZNAS to Support Flood and Landslide Victims in Sumatra



Grup Merdeka melalui program "Merdeka Berbagi: Ulurkan Tangan, Satukan Harapan!" berkolaborasi dengan Badan Amil Zakat Nasional (BAZNAS) serta Kementerian Energi dan Sumber Daya Mineral (ESDM) dalam mendukung percepatan penanganan dan pemulihan pascabencana banjir bandang dan tanah longsor di Aceh, Sumatra Utara, dan Sumatra Barat.

Bencana alam yang terjadi pada akhir November 2025 tersebut menimbulkan dampak kemanusiaan yang signifikan, mengakibatkan ribuan rumah dan fasilitas umum mengalami kerusakan, terhentinya aktivitas sosial dan ekonomi masyarakat, serta terputusnya akses dan infrastruktur pendukung di sejumlah wilayah terdampak. Selain menimbulkan korban jiwa, bencana tersebut juga menyebabkan puluhan ribu warga harus mengungsi.

Merespons kondisi tersebut, seluruh karyawan Merdeka dan entitas anak menggalang bantuan donasi yang berhasil terkumpul sebesar Rp977.106.674. Bantuan tersebut secara simbolis diserahkan oleh Presiden Direktur Merdeka kepada Pimpinan Bidang Pengumpulan BAZNAS RI di Kantor Pusat Merdeka pada 12 Desember 2025. Selanjutnya, dana bantuan dikelola dan disalurkan oleh BAZNAS RI secara tepat sasaran, transparan, dan profesional kepada para korban banjir bandang dan tanah longsor.

Selain bantuan dana, Grup Merdeka juga menyalurkan bantuan logistik untuk memenuhi kebutuhan mendesak para penyintas di lokasi pengungsian. Bantuan tersebut meliputi pakaian layak pakai, popok dan perlengkapan bayi, selimut, serta sajadah. Dukungan ini diharapkan dapat membantu menjaga kenyamanan, kesehatan, dan pemenuhan kebutuhan dasar masyarakat selama masa tanggap darurat dan pemulihan.

Selain itu, Tim Tanggap Darurat Grup Merdeka turut terjun langsung ke lapangan, berkolaborasi dengan berbagai pihak untuk memberikan respons cepat serta bantuan nyata bagi masyarakat terdampak bencana.

Merdeka Group, through its program "Merdeka Berbagi: Ulurkan Tangan, Satukan Harapan!" ("Merdeka Shares: Extend a Hand, Unite Hope!"), collaborated with the National Zakat Agency (BAZNAS) and the Ministry of Energy and Mineral Resources (ESDM) to support the acceleration of emergency response and post-disaster recovery following flash floods and landslides in Aceh, North Sumatra, and West Sumatra.

The natural disasters that occurred in late November 2025 had a significant humanitarian impact, causing damage to thousands of homes and public facilities, disrupting social and economic activities, and severing access and supporting infrastructure in several affected areas. In addition to resulting in casualties, the disasters also forced tens of thousands of residents to evacuate.

In response to these conditions, all employees of Merdeka and its subsidiaries organized a donation drive, successfully raising IDR977,106,674. The donation was symbolically handed over by the President Director of Merdeka to the Head of Fundraising at BAZNAS RI at the Merdeka Head Office on 12 December 2025. The funds were subsequently managed and distributed by BAZNAS RI in a targeted, transparent, and professional manner to the victims of the flash floods and landslides.

In addition to financial assistance, Merdeka Group also provided logistical support to meet the urgent needs of survivors in evacuation areas. The assistance included wearable clothing, diapers and baby supplies, blankets, and prayer mats. This support is expected to help maintain comfort, health, and the fulfillment of basic needs during the emergency response and recovery periods.

Furthermore, Merdeka Group's Emergency Response Team was deployed directly to the field, collaborating with various stakeholders to deliver a swift response and tangible assistance to affected communities.

Mekanisme Pengaduan Masyarakat [F.16][F.24][2-16][2-26][F.28][413-2][14.10.2][14.10.3][14.10.4][414-1][14.17.9][414-2][14.17.10]

Merdeka menyediakan mekanisme pengaduan yang efektif bagi masyarakat guna menyampaikan serta menindaklanjuti keluhan terkait dampak sosial dan lingkungan akibat kegiatan operasional perusahaan. Mekanisme ini difasilitasi melalui Sistem Pelaporan Pelanggaran (*Whistleblowing System/WBS*) yang dikelola oleh konsultan independen. Masyarakat dapat menyampaikan pengaduan melalui WBS yang dapat diakses melalui <https://Merdeka.whispli.com/SpeakUp> atau melalui layanan telepon dan WhatsApp di nomor 0812 5000 1018. Setiap laporan yang masuk akan diverifikasi dan diproses sesuai dengan prosedur yang berlaku.

Selain WBS, entitas anak Merdeka juga menyediakan mekanisme pengaduan khusus bagi masyarakat. Mekanisme ini disajikan pada Bab Menghormati Hak Asasi Manusia pada laporan ini.

Berikut adalah tabel yang merangkum jumlah dan jenis keluhan yang diterima oleh setiap unit bisnis Merdeka hingga akhir tahun 2025:

Entitas anak Subsidiaries	Jumlah Pengaduan Number of Grievances	Jenis Pengaduan Grievance Description	Pengelolaan Pengaduan Grievance Management
Tambang Emas Tujuh Bukit Tujuh Bukit Gold Mine	6	Aktivitas blasting, ketersediaan air bersih, infrastruktur jembatan dan penerangan jalan, pemasok lokal, bantuan kepada kelompok rentan dan genangan air. Blasting activities, availability of clean water, bridge infrastructure and street lighting, local suppliers, assistance for vulnerable groups, and standing water.	Monitoring kegiatan blasting, kompensasi nelayan terdampak, pembangunan fasilitas air bersih dan perbaikan saluran air, serta perbaikan jalan dan jembatan. Blasting activity monitoring, compensation for affected fishermen, development of clean water facilities and improvement of water channels, as well as road and bridge repairs.
Tambang Emas Pani Pani Gold Mine	8	Kerusakan jalan, tanah, dan properti, kebisingan suara, dan debu. Road, land, and property damage, noise disturbance, and dust generation	Ganti rugi, penimbunan dan pengerasan jalan, perbaikan tanggul dan pengangkatan sedimen, pengurangan alat-alat berat yang beroperasi di belakang sekolah dasar di Kecamatan Buntulia. Compensation, road filling and paving, embankment repair and sediment removal, reduction of heavy equipment operating behind elementary school in Sub-district Buntulia.
Pabrik AIM AIM Plant	9	Pemberdayaan tenaga kerja lokal, genangan air, pemasok lokal dan keselamatan di jalan raya. Empowerment of the local workforce, standing water, local suppliers, and road safety.	Peningkatan kapasitas saluran air dan perbaikan infrastruktur drainase, inspeksi kendaraan operasional, pelatihan safety driving, pelatihan pemasok lokal dan pelatihan peningkatan kompetensi masyarakat lokal. Enhancement of water channel capacity and drainage infrastructure improvements, inspection of operational transportation vehicles, safety driving training, training for local suppliers and for local communities.
Tambang Nikel Konawe Konawe Nickel Mine	8	Pemberdayaan tenaga kerja lokal, pemasok lokal dan keselamatan kendaraan angkutan karyawan. Empowerment of the local workforce, local suppliers, and the safety of employee transportation vehicles.	Inspeksi rutin kendaraan operasional, pelatihan safety driving, pendampingan pemasok lokal dan pelatihan peningkatan kompetensi masyarakat lokal. Routine inspection of operational vehicles, safety driving training, mentoring of local suppliers, and competency development training for local communities.

Community Grievance Mechanism

Merdeka provides an effective grievance mechanism for communities to report and address complaints related to social and environmental impacts caused by its operations. This mechanism is facilitated through the Whistleblowing System (WBS), which is managed by an independent consultant. Grievance can be submitted through the WBS platform at <https://Merdeka.whispli.com/SpeakUp> or via phone and WhatsApp at 0812 5000 1018. Every report submitted is verified and processed according to established procedures.

In addition to the Whistleblowing System (WBS), Merdeka's subsidiaries also provide a dedicated grievance mechanism for the community. This mechanism is presented in Respecting Human Rights chapter of this report.

The following table provides a summary of the number and types of complaints received by each Merdeka business unit as of the end of 2025:

Hingga akhir tahun 2025, seluruh pengaduan di entitas anak telah dibahas di tingkat Direksi dan ditindaklanjuti oleh Divisi Community dengan pelibatan aktif pelapor dalam proses penyelesaiannya.

Pengembangan dan Pemberdayaan Masyarakat [F.23] [F.25] [413-1][14.8.9][14.9.1][14.10.2]

Seluruh entitas anak Merdeka berkomitmen untuk melaksanakan program Pengembangan dan Pemberdayaan Masyarakat (PPM) secara berkelanjutan. Program-program tersebut dijalankan berdasarkan Standar PPM yang menekankan kepatuhan terhadap peraturan perundang-undangan yang berlaku di Indonesia, penghormatan terhadap kearifan dan budaya masyarakat setempat, serta penerapan prinsip transparansi dan keadilan.

Dalam implementasi program PPM, Merdeka menerapkan tahapan yang meliputi perencanaan melalui identifikasi kebutuhan masyarakat, pemetaan potensi lokal, serta penyusunan program yang selaras dengan aspirasi dan kondisi sosial-ekonomi masyarakat; pelaksanaan program yang dilakukan secara partisipatif dengan melibatkan masyarakat, pemerintah daerah, dan pemangku kepentingan guna memastikan efektivitas serta keberlanjutan program; pengawasan dan pendampingan melalui monitoring berkala untuk memastikan program berjalan sesuai rencana sekaligus memberikan dukungan agar masyarakat mampu mengelola hasil program secara mandiri; serta evaluasi dan pelaporan untuk menilai dampak program terhadap kesejahteraan masyarakat dan menyampaikan hasilnya sebagai bagian dari komitmen terhadap transparansi dan perbaikan berkelanjutan.

Melalui tahapan ini, Merdeka berupaya meningkatkan kesejahteraan dan kualitas hidup masyarakat di sekitar wilayah operasi dengan pendekatan sistematis dan berkelanjutan.

Sesuai dengan Keputusan Menteri Energi dan Sumber Daya Mineral No. 1824 K/30/MEM/2018, setiap entitas anak Merdeka menyusun Rencana Induk Pengembangan dan Pemberdayaan Masyarakat (RIPPM). RIPPM disusun berdasarkan informasi dari studi rona awal, analisis dampak sosial, serta masukan dari berbagai pemangku kepentingan, termasuk hasil Musyawarah Perencanaan dan Pembangunan Daerah (Musrenbang) serta aspirasi masyarakat.

Musrenbang, sebagai forum formal antara pemerintah daerah dan pemangku kepentingan, berperan penting dalam menyelaraskan program PPM dengan rencana pembangunan daerah. Setiap entitas anak kemudian menyusun Rencana Tahunan PPM yang lebih terperinci dan mengacu pada RIPPM. Realisasi program PPM dicatat dan dilaporkan kepada Direksi secara berkala tiap triwulan, semester, dan tahunan.

By the end of 2025, all complaints within the subsidiaries had been discussed at the Board of Directors level and followed up by the Community Division, with the active involvement of the complainants in the resolution process.

Community Development and Empowerment

All Merdeka subsidiaries are committed to implementing Community Development and Empowerment (CDE) programs on a sustainable basis. These programs are carried out in accordance with CDE Standards that emphasize compliance with applicable laws and regulations in Indonesia, respect for local wisdom and cultural values, and the application of principles of transparency and fairness.

In implementing its CDE programs, Merdeka applies stages that include planning through identification of community needs, mapping local potential, and program design aligned with community aspirations and socio-economic conditions; participatory implementation involving communities, local governments, and stakeholders to ensure program effectiveness and sustainability; monitoring and assistance through periodic oversight to ensure programs run as planned while supporting communities in managing program outcomes independently; and evaluation and reporting to assess program impacts on community welfare and disclose results as part of Merdeka's commitment to transparency and continuous improvement.

Through this structured approach, Merdeka aims to enhance the well-being and quality of life of communities near its operations in a systematic and sustainable way.

In line with Minister of Energy and Mineral Resources Regulation No. 1824 K/30/MEM/2018, each Merdeka subsidiary develops a Master Plan for Community Development and Empowerment. This plan is based on baseline studies, social impact analyses, and input from various stakeholders, including the Regional Development Planning Deliberation (Musrenbang) and community aspirations.

As a formal forum between local governments and stakeholders, Musrenbang plays a key role in aligning CDE programs with regional development plans. Each subsidiary then develops a detailed Annual CDE Plan based on the master plan. The progress of CDE programs is documented and reported to the Board of Directors on a quarterly, semi-annual, and annual basis.

BSI Resmikan Rumah Pintar Pertama di Banyuwangi, Dorong Akses Pendidikan Berkualitas

BSI Inaugurates First "Rumah Pintar" in Banyuwangi to Promote Access to Quality Education



PT Bumi Suksesindo meresmikan Rumah Pintar pertama di Banyuwangi pada 17 November 2025 di Dusun Silirbaru, Desa Sumberagung, Pesanggaran. Fasilitas ini menjadi pusat belajar non-formal bagi pelajar sekitar tambang dan merupakan bagian dari komitmen program Pengembangan dan Pemberdayaan Masyarakat (PPM) BSI di bidang pendidikan.

Peresmian dilakukan oleh Ipuk Fiestiandani Azwar Anas, Bupati Banyuwangi, bersama Riyadi Effendy, Direktur BSI dan Roelly Fransza, KTT BSI, serta dilanjutkan dengan penandatanganan prasasti peresmian Rumah Pintar di Sumberagung.

PT Bumi Suksesindo inaugurated its first Rumah Pintar (Smart Learning Center) in Banyuwangi on November 17, 2025, located in Silirbaru Hamlet, Sumberagung Village, Pesanggaran. The facility serves as a non-formal learning center for students living around the mining area and forms part of BSI's Community Development and Empowerment Program (CDE) in the education sector.

The inauguration was officiated by Ipuk Fiestiandani Azwar Anas, together with Riyadi Effendy, Director of BSI, and Roelly Fransza, Head of Technical Mining (KTT) of BSI, followed by the signing of the inauguration plaque for the Rumah Pintar in Sumberagung.



Rumah Pintar binaan BSI ini dilengkapi enam ruang kelas ber-AC, mushola, dapur, toilet, serta ruang UMKM untuk kegiatan pemberdayaan masyarakat. Saat ini, dua program unggulan untuk pelajar kelas 4–6 SD dan kelas 7–9 SMP adalah Kursus Komputer Gratis dan Kursus Bahasa Inggris Gratis.

Rumah Pintar dirancang untuk mendukung pendidikan formal dan meningkatkan keterampilan siswa setelah jam sekolah. Pada momen yang sama, BSI dan Pemerintah Daerah juga menandatangani prasasti untuk dua inisiatif pendidikan lainnya, yaitu renovasi ruang kelas di SDN 7 Sumberagung dan SDN 9 Sumberagung. Melalui Rumah Pintar dan dua renovasi sekolah dasar di Sumberagung, BSI semakin meneguhkan komitmennya membangun generasi muda yang adaptif, terampil, dan siap menghadapi tantangan dunia modern.

The Rumah Pintar facility is equipped with six air-conditioned classrooms, a prayer room, kitchen, restrooms, and a dedicated MSME space to support community empowerment activities. Currently, two flagship programs are offered for elementary (Grades 4–6) and junior high school students (Grades 7–9), namely free computer courses and free English courses.

The Rumah Pintar is designed to complement formal education and enhance students' skills beyond school hours. On the same occasion, BSI and the local government also signed plaques for two additional education initiatives, namely the renovation of classrooms at SDN 7 Sumberagung and SDN 9 Sumberagung. Through the Rumah Pintar initiative and the renovation of two elementary schools in Sumberagung, BSI further reinforces its commitment to developing a generation that is adaptive, skilled, and well-prepared to face the challenges of the modern world.



Pendidikan

Merdeka Tsingshan Indonesia melaksanakan program pelatihan dan sertifikasi Lisensi Kesehatan dan Keselamatan Kerja (K3) operator excavator bagi 7 warga lokal, dengan 6 di antaranya kini bekerja di kawasan industri IMIP. Dalam rangka Bulan K3 Nasional, perusahaan menyelenggarakan Program Merdeka Mengajar bersama Departemen K3 bagi 225 penerima manfaat. Selain itu, perusahaan menyalurkan bantuan peralatan sekolah bagi 339 siswa dan guru SDN Makarti Jaya serta bantuan peralatan TPA bagi 70 santri.

Tambang Emas Pani melaksanakan program pendidikan untuk meningkatkan kapasitas sumber daya manusia lokal di Kabupaten Pohuwato dengan memberikan manfaat bagi 450 masyarakat sekitar melalui dukungan kegiatan pendidikan sekolah, bantuan perlengkapan bagi anak korban kebakaran di Desa Hulawa, serta renovasi SDN 09 Buntulia untuk meningkatkan kenyamanan belajar. Perusahaan juga memasang prasasti di 3 sekolah yang telah direnovasi, menjalin kolaborasi dengan MGEI Universitas Hasanuddin (UNHAS), serta menyelenggarakan kunjungan lapangan bagi mahasiswa asal Pohuwato untuk memperluas wawasan terkait sektor pertambangan.

Tambang Nikel Konawe melaksanakan program *Mine Tour* bagi 90 guru dan tenaga kesehatan, beasiswa pendidikan tinggi bagi 97 mahasiswa, insentif bagi 48 guru honorer, serta pelatihan dasar *dump truck* bagi 16 pemuda lokal. Selain itu, perusahaan menyediakan fasilitas olahraga bagi 12 siswa SMPN 2 Rوتا dan berpartisipasi dalam peringatan Hari Pendidikan Nasional 2025 yang melibatkan lebih dari 267.000 peserta, serta menjalin kerja sama beasiswa dengan Universitas Lakidende (UNILAKI).

Tambang Tembaga Wetar melaksanakan program beasiswa bagi 162 siswa dan mahasiswa dari Desa Lurang, Uhak, Naumatang, Esulit, Nabar, dan Eray. Selain itu, 150 siswa SMP dan SMA mengikuti sosialisasi pentingnya pendidikan formal, sementara 33 guru mendapatkan pelatihan implementasi Kurikulum Merdeka. Perusahaan juga memberikan bantuan fasilitas sekolah kepada 800 siswa di wilayah Ring I dan II serta honorarium bagi 6 guru TK non-ASN/PNS yang mendukung pendidikan bagi 109 anak Taman Kanak-Kanak.

Kesehatan

Tambang Emas Tujuh Bukit melaksanakan program penanggulangan stunting melalui Pemberian Makanan Tambahan Pemulihan bagi balita dan ibu hamil dengan kekurangan energi kronik, promosi kesehatan masyarakat, donor darah bersama UDD PMI Banyuwangi, serta pelatihan kader posyandu dan TBC. Program ini memberikan manfaat bagi 159 orang penerima makanan tambahan untuk pemulihan, 9.393 orang peserta promosi kesehatan, pelatihan bagi 147 kader kesehatan, dan peningkatan akses layanan kesehatan melalui pembangunan 25 titik air bersih serta program bedah rumah di 7 lokasi.

Education

Merdeka Tsingshan Indonesia implemented an Occupational Health and Safety (OHS) excavator operator training and licensing program for 7 local residents, with 6 now working in the IMIP industrial area. During National OHS Month, the Company organized the Merdeka Mengajar Program with the OHS Department, benefiting 225 participants. In addition, the Company provided school equipment to 339 students and teachers at SDN Makarti Jaya, as well as learning equipment for 70 TPA students.

Pani Gold Mine carried out education programs aimed at strengthening the capacity of local human resources in Pohuwato Regency, benefiting 450 community members through support for school education activities, assistance for children affected by a fire in Hulawa Village, and the renovation of SDN 09 Buntulia to improve the learning environment. The company also installed commemorative plaques in three renovated schools, established collaboration with MGEI Hasanuddin University (UNHAS), and organized field visits for students from Pohuwato to broaden their understanding of the mining sector.

Konawe Nickel Mine implemented a Mine Tour for 90 teachers and healthcare workers, provided higher education scholarships for 97 students, incentives for 48 honorary teachers, and basic dump truck training for 16 local youth. The Company also provided sports facilities for 12 students of SMPN 2 Rوتا, participated in the 2025 National Education Day involving more than 267,000 participants, and established a scholarship partnership with Lakidende University (UNILAKI).

Wetar Copper Mine implemented a scholarship program for 162 students from Lurang, Uhak, Naumatang, Esulit, Nabar, and Eray villages. In addition, 150 junior and senior high school students joined awareness sessions on the importance of formal education, while 33 teachers received training on the Merdeka Curriculum implementation. The Company also provided school facility support for 800 students in Ring I and II areas and honorariums for 6 non-civil servant kindergarten teachers supporting education for 109 kindergarten children.

Health

Tujuh Bukit Gold Mine implemented stunting prevention through Supplementary Feeding for Recovery for toddlers and pregnant women with chronic energy deficiency, public health promotion, blood donation with the Banyuwangi PMI Blood Donation Unit (UDD PMI), and training for posyandu and TB health cadres. The program benefited 159 recipients of recovery feeding, 9,393 participants in health promotion, and 147 trained health cadres, while also improving healthcare access through the construction of 25 clean water points and house renovation programs in 7 locations.

Merdeka Tsingshan Indonesia melaksanakan program Merdeka Cegah Stunting dengan memberikan manfaat bagi 421 warga Desa Labota dan Makarti Jaya, termasuk balita dan ibu hamil rentan, melalui pemberian makanan tambahan dan pendampingan psikologis. Program ini berhasil menurunkan kasus stunting hingga 85% serta melatih 84 warga lokal dalam pengelolaan gizi seimbang. Selain itu, perusahaan menyalurkan bantuan fasilitas kesehatan bagi 5.948 warga di Unit Pelaksana Teknis Daerah (UPTD) Puskesmas Bahodopi serta melaksanakan Merdeka *Social Health Baseline Assessment* kepada 1.005 responden untuk memetakan isu kesehatan seperti Infeksi Saluran Pernapasan Akut (ISPA), *stunting*, Kekurangan Energi Kronis (KEK), dan HIV/AIDS.

Tambang Emas Pani melaksanakan program kesehatan yang berfokus pada peningkatan gizi, kesehatan ibu dan anak, serta edukasi pola hidup sehat bagi masyarakat sekitar tambang. Program ini memberikan manfaat bagi 457 orang ibu hamil, anak-anak, guru, dan siswa di Desa Hulawa dan Buntulia. Kegiatan dilaksanakan melalui Posyandu rutin yang memberikan layanan kesehatan dan pemantauan gizi bagi anak-anak *stunting*, anak dengan gizi kurang, serta ibu hamil, serta sosialisasi Makan Baik untuk meningkatkan pemahaman masyarakat mengenai pola konsumsi yang sehat dan bergizi.

Tambang Nikel Konawe melaksanakan sosialisasi Integrasi Layanan Primer (ILP) bagi 56 kader dan aparat desa, pemberian insentif bagi 8 tenaga kesehatan honorer, serta pengadaan unit *Ambulance Community Health Care* yang melayani 5.133 warga di Kecamatan Rوتا dan Wiwirano.

Merdeka Tsingshan Indonesia implemented the Merdeka Prevent Stunting Program, benefiting 421 residents of Labota and Makarti Jaya Villages, including vulnerable toddlers and pregnant women, through the provision of supplementary nutrition and psychological assistance. The program successfully reduced stunting cases by 85% and trained 84 local residents in balanced nutrition management. In addition, the company provided health facility assistance to 5,948 residents at the Bahodopi Community Health Center (UPTD Puskesmas Bahodopi) and conducted a Merdeka Social Health Baseline Assessment involving 1,005 respondents to map health issues such as acute respiratory infections, stunting, chronic energy deficiency, and HIV/AIDS.

Pani Gold Mine implemented health programs focusing on nutrition improvement, maternal and child health, and healthy lifestyle education for communities around the mine. The program benefited 457 pregnant women, children, teachers, and students in Hulawa and Buntulia villages. Activities were conducted through regular Posyandu services providing health services and nutrition monitoring for stunted and undernourished children and pregnant women, as well as the Eat Well campaign to improve community understanding of healthy and nutritious diets.

Konawe Nickel Mine conducted Integrated Primary Healthcare socialization for 56 health cadres and village officials, provided incentives for 8 honorary health workers, and provided a Community Health Care ambulance unit serving 5,133 residents in Rوتا and Wiwirano subdistricts.



▲ SCM provides support for community health

Tambang Tembaga Wetar melaksanakan program pencegahan stunting di Desa Lurang, Uhak, dan Naumatang bagi 18 balita dan ibu hamil melalui pemberian bahan pangan bergizi dan penyuluhan kesehatan, yang berkontribusi menurunkan kasus *stunting* dan Kurang Energi Kronis (KEK) hingga 80%. Pemeriksaan kesehatan dan pengobatan di klinik perusahaan yang bekerja sama dengan Puskesmas Lurang menjangkau 151 warga, dengan 100% pasien memperoleh perawatan dan 80% dirujuk ke fasilitas kesehatan yang lebih lengkap jika diperlukan. Selain itu, lomba lingkungan sehat di 6 desa melibatkan 3.500 warga dengan peningkatan kepatuhan pembuangan sampah hingga 70%, serta kampanye perilaku hidup bersih yang menjangkau 130 warga. Perusahaan juga memberikan bantuan alat kesehatan dan obat-obatan bagi Puskesmas Lurang dan Eray untuk mendukung pelayanan kesehatan bagi sekitar 3.500 warga.

Peningkatan Pendapatan Riil/Pekerjaan

Tambang Emas Tujuh Bukit melaksanakan program pemberdayaan ekonomi untuk meningkatkan pendapatan dan kemandirian masyarakat di sekitar tambang dengan memberdayakan 412 masyarakat lokal yang terdiri atas pemuda dan perempuan melalui dukungan pengembangan ekonomi berbasis profesi masyarakat, seperti peternakan dan jasa pengangkutan kayu. Program ini berkontribusi pada peningkatan pendapatan bagi 83 anggota kelompok ternak kambing, 45 anggota Tim Orange dan Hijau, 296 anggota Tim Porter, serta 8 pekerja pembuatan paving.

Merdeka Tsingshan Indonesia melaksanakan program penanaman dan restorasi mangrove di Desa Tofuti dan Matansala. Program ini melibatkan 8 warga lokal yang mendapatkan pelatihan dan pendampingan dalam perawatan serta pemeliharaan ekosistem mangrove. Melalui kegiatan ini, masyarakat memperoleh tambahan pendapatan dari kegiatan restorasi mangrove sekaligus berperan aktif dalam menjaga kelestarian lingkungan pesisir.

Tambang Emas Pani melaksanakan program peningkatan pendapatan masyarakat melalui dukungan terhadap tenaga layanan kesehatan di tingkat desa. Program ini memberikan manfaat bagi 10 orang bidan, perawat, petugas gizi, dan kader kesehatan di Desa Hulawa. Kegiatan dilaksanakan melalui pemberian insentif rutin bagi petugas Posyandu sebagai bentuk apresiasi atas dedikasi mereka dalam memberikan layanan kesehatan masyarakat.

Tambang Nikel Konawe melaksanakan program rekrutmen 280 orang tenaga kerja lokal yang ditempatkan di mitra kontraktor. Perusahaan juga melakukan pendampingan kepada Koperasi Wonua Rota Sejahtera (WRS) dalam pengelolaan limbah ban bekas dan metal scrap, serta bantuan alat mesin pertanian, pupuk, dan benih hortikultura bagi 2.316 penerima manfaat.

Tambang Tembaga Wetar melaksanakan program pendampingan kepada 80 orang di sektor pertanian dan perkebunan, 25 orang di sektor peternakan, 15 orang di sektor

Wetar Copper Mine implemented stunting prevention in Lurang, Uhak, and Naumatang villages for 18 toddlers and pregnant women through nutritious food support and health counseling, contributing to an 80% reduction in stunting and chronic energy deficiency (CED) cases. Health examinations and treatment at the company clinic with Puskesmas Lurang reached 151 residents, with 100% receiving treatment and 80% referred to more complete healthcare facilities when needed. In addition, a healthy environment competition in six villages involved 3,500 residents, increasing proper waste disposal compliance by 70%, while clean and healthy living campaigns reached 130 residents. The Company also provided medical equipment and medicines to Puskesmas Lurang and Eray to support healthcare services for around 3,500 residents.

Real Income Improvement/Employment

Tujuh Bukit Gold Mine implemented economic empowerment programs to increase income and independence among communities around the mine by engaging 412 local residents, including youth and women, through support for community profession-based economic activities such as livestock farming and timber transportation services. The program contributed to increased income for 83 members of goat farming groups, 45 members of the Orange and Green Teams, 296 members of the Porter Team, and 8 paving production workers.

Merdeka Tsingshan Indonesia implemented a mangrove planting and restoration program in Tofuti and Matansala Villages. The program involved 8 local residents who received training and mentoring in mangrove ecosystem maintenance and care. Through this initiative, the community gained additional income from mangrove restoration activities while actively contributing to the preservation of coastal ecosystems.

Pani Gold Mine implemented a community income improvement program by supporting village-level healthcare workers. The program benefited 10 midwives, nurses, nutrition officers, and health cadres in Hulawa Village. Activities were carried out through regular incentives for Posyandu workers as recognition for their dedication in providing community health services.

Konawe Nickel Mine implemented a local workforce recruitment program for 280 people, who were placed with contractor partners. The company also provided assistance to Koperasi Wonua Rota Sejahtera (WRS) in managing used tire waste and metal scrap, as well as agricultural support including farming equipment, fertilizers, and horticultural seeds for 2,316 beneficiaries.

Wetar Copper Mine implemented assistance programs for 80 individuals in the agriculture and plantation sector, 25 in livestock farming, 15 in fisheries, and supported local

perikanan, serta pemanfaatan transportasi lokal bagi 20 orang di Desa Lurang dan Desa Uhak. Penerima manfaat program ini yaitu kelompok rentan seperti perempuan dan keluarga yang bergantung pada sektor pertanian, peternakan, perikanan, dan jasa transportasi lokal. Capaian program menunjukkan bahwa 50% pelaku usaha pertanian, 30% peternakan, 20% perikanan, dan 10% penyedia jasa transportasi mengalami peningkatan pendapatan dan mampu memenuhi kebutuhan ekonomi sehari-hari.

transportation services for 20 people in Lurang and Uhak Villages. The beneficiaries included vulnerable groups such as women and families dependent on agriculture, livestock, fisheries, and local transportation services. Program outcomes showed that 50% of agricultural businesses, 30% of livestock businesses, 20% of fisheries businesses, and 10% of transportation service providers experienced increased income, enabling them to meet their daily economic needs.



▲ Pani Gold Mine provides support to Integrated Health Service Post (Posyandu)

Kemandirian Ekonomi

Tambang Emas Tujuh Bukit melaksanakan program pemberdayaan pelaku Usaha Mikro, Kecil dan Menengah (UMKM) melalui pembukaan akses pemasaran, pengembangan kapasitas usaha, serta pelibatan pelaku UMKM dalam kegiatan yang menunjang program perusahaan. Program ini melibatkan 71 anggota UMKM Center, 337 pelaku usaha kuliner, dan 17 tim Waruung.com, yang berhasil memperluas jangkauan pasar, meningkatkan pendapatan, serta mendorong kemandirian ekonomi masyarakat lokal.

Merdeka Tsingshan Indonesia melaksanakan program BUMILOKA (BUMDes Penggerak Motor Ekonomi Lokal) dan BUMI DAYA (Bumi Makarti Digdaya Agro Tani). Melalui BUMILOKA, masyarakat memperoleh peningkatan pendapatan dari pemasaran hasil pertanian lokal untuk Catering Aden, dengan pendapatan BUMDes mencapai Rp3,2 miliar serta berkontribusi 10% terhadap PADes. Program ini juga meraih penghargaan *Top CSR Awards 2025* Bintang 4. Selain itu, program BUMI DAYA melibatkan 5 petani lokal dalam pengembangan lahan pertanian seluas 300 m², yang berkontribusi pada penciptaan lapangan kerja baru dan penguatan ketahanan pangan desa.

Economic Independence

Tujuh Bukit Gold Mine implemented programs to empower Micro, Small, and Medium Enterprises (MSMEs) by expanding market access, strengthening business capacity, and involving MSME actors in activities that support company programs. The program engaged 71 members of the MSME Center, 337 culinary business actors, and 17 Waruung.com teams, successfully expanding market reach, increasing income, and promoting the economic independence of local communities.

Merdeka Tsingshan Indonesia implemented the BUMILOKA program (Village-Owned Enterprise as a Driver of the Local Economy) and BUMI DAYA (Bumi Makarti Digdaya Agro Tani). Through BUMILOKA, communities increased their income through the marketing of local agricultural products to Aden Catering, generating village-owned enterprise (BUMDes) revenue of IDR 3.2 billion and contributing 10% to Village Original Revenue (PADes). The program also received the *Top CSR Awards 2025* – 4-Star rating. Meanwhile, the BUMI DAYA program involved 5 local farmers in developing 300 m² of agricultural land, contributing to job creation and strengthening village food security.

Tambang Emas Pani melaksanakan program pemberdayaan ekonomi lokal yang berfokus pada penguatan usaha masyarakat dan peningkatan partisipasi ekonomi desa dengan memberikan manfaat bagi 1.327 masyarakat lokal yang terdiri dari pelaku usaha kecil, pemilik kios, dan masyarakat di sembilan desa lingkaran tambang. Program dilaksanakan melalui pembagian minyak goreng 1 liter selama kegiatan Safari Ramadhan yang melibatkan 11 kios binaan sebagai mitra penyalur produk lokal. Perusahaan juga mendukung pemberdayaan masyarakat lokal melalui pembuatan upiya karangji "Khas Gorontalo" oleh UMKM Oliniyaa Kraft yang melibatkan 15 orang perempuan pelaku usaha lokal untuk meningkatkan keterampilan dan memperluas pemasaran produk daerah serta memberikan dukungan pada pelaksanaan *Launching* Koperasi Desa Merah Putih di Desa Hulawa.

Tambang Nikel Konawe melaksanakan program penguatan kemandirian ekonomi masyarakat melalui pendampingan kelembagaan ekonomi lokal dengan melibatkan 8 pemuda Kelurahan Rounta yang tergabung dalam Koperasi Wonua Rounta Sejahtera (WRS) untuk memperoleh pendampingan dalam pengelolaan limbah ban bekas dan metal scrap.

Tambang Tembaga Wetar melaksanakan program pengembangan bisnis kepada 150 pelaku usaha jambu mete dan madu hutan, pengembangan sistem pertanian terpadu bagi 100 petani, pelatihan pemasaran UMKM bagi 20 orang, serta layanan pengangkutan barang masyarakat yang dimanfaatkan oleh sekitar 2.000 warga. Penerima manfaat program ini yaitu masyarakat Desa Lurang dan Uhak, termasuk pemilik kebun, pencari madu hutan, petani, ibu rumah tangga, lansia, dan pelaku usaha lokal. Capaian program menunjukkan bahwa 100% petani jambu mete dan pencari madu hutan memperoleh pelatihan pengolahan, 50% petani dan peternak memahami dan menerapkan sistem pertanian terpadu, 10% ibu rumah tangga mampu mengelola produk UMKM bernilai ekonomi tinggi, serta 70% masyarakat memanfaatkan transportasi lokal untuk mendukung peningkatan pendapatan.

Pani Gold Mine implemented a local economic empowerment program focusing on strengthening community businesses and increasing village economic participation, benefiting 1,327 local residents including small business actors, kiosk owners, and communities in nine villages around the mine. Activities included the distribution of 1 liter cooking oil during the Safari Ramadhan program involving 11 partner kiosks as distributors of local products. The Company also supported local empowerment through the production of Upiya Karangji "Khas Gorontalo" by Oliniyaa Kraft MSME, involving 15 local women entrepreneurs to improve skills and expand regional product marketing, and supported the launch of the Merah Putih Village Cooperative in Hulawa Village.

Konawe Nickel Mine implemented programs to strengthen community economic independence through institutional assistance for local economic organizations, involving 8 youth from Rounta Subdistrict who are members of Koperasi Wonua Rounta Sejahtera (WRS), providing mentoring in the management of used tire waste and metal scrap.

Wetar Copper Mine implemented business development programs for 150 cashew nut and wild honey entrepreneurs, supported the development of integrated farming systems for 100 farmers, conducted MSME marketing training for 20 participants, and provided community goods transportation services used by approximately 2,000 residents. Beneficiaries included communities from Lurang and Uhak Villages, such as plantation owners, wild honey collectors, farmers, housewives, elderly residents, and local entrepreneurs. Program outcomes show that 100% of cashew farmers and wild honey collectors received processing training, 50% of farmers and livestock breeders understood and applied integrated farming systems, 10% of housewives were able to manage high-value MSME products, and 70% of community members utilized local transportation services to support income generation.

Sosial dan Budaya

Tambang Emas Tuhuk Bukit melaksanakan pembangunan dan renovasi sarana ibadah, penyaluran hewan kurban, dukungan terhadap perayaan budaya dan kearifan lokal, serta bantuan kemanusiaan bagi masyarakat terdampak bencana. Penerima manfaat program ini yaitu kelompok umat beragama di wilayah ring 1, ring 2, dan ring 3, masyarakat terdampak banjir di Kecamatan Pesanggaran dan Siliragung, serta kelompok nelayan dan masyarakat di berbagai desa sekitar tambang. Perusahaan juga menyalurkan 21 sapi dan 23 kambing kurban kepada 29 masjid, musala, dan 6 instansi pemerintahan, serta mendukung kegiatan budaya seperti Petik Laut, Bersih Desa, Gandrung Sewu, dan Tour de Ijen Banyuwangi. Selain itu, perusahaan menyalurkan berbagai bantuan sosial, termasuk 1.000 paket sembako dalam rangka Hari Jadi Banyuwangi, 500 paket bagi petugas kebersihan, serta 294 paket melalui program Banyuwangi Berbagi, serta memberikan insentif kepada 10 staf Desa Sumberagung.

Merdeka Tsingshan Indonesia melaksanakan kegiatan sosial dan budaya yang melibatkan 2.163 penerima manfaat di Kecamatan Bahodopi dan sekitarnya. Program dilaksanakan melalui dukungan terhadap kegiatan olahraga, pendidikan, dan keagamaan, seperti lomba antar desa, Musabaqah Tilawatil Quran (MTQ), peringatan Hari Pramuka, serta perayaan Hari Kemerdekaan Republik Indonesia. yang berkontribusi dalam memperkuat rasa nasionalisme dan pengembangan potensi generasi muda di bidang olahraga dan kepemudaan.

Tambang Emas Pani melaksanakan program sosial dan keagamaan untuk meningkatkan solidaritas sosial, kepedulian masyarakat, serta pelestarian tradisi lokal di wilayah lingkaran tambang di Kabupaten Pohuwato dengan melibatkan 4.698 orang dan 2.400 keluarga sebagai penerima manfaat. Kegiatan dilaksanakan melalui Safari Ramadhan dan Tumbilotohe yang dihadiri oleh 450 keluarga, Pasar Murah menjelang Idul Fitri untuk membantu 1.500 keluarga berpenghasilan rendah dalam memperoleh kebutuhan pokok dengan harga terjangkau. Perusahaan juga memberikan hewan kurban sebanyak 14 ekor serta Tebar Hewan Kurban yang bermanfaat bagi 294 masyarakat di wilayah Buntulia, Bulangita, dan Teratai. Dukungan juga diberikan bagi kegiatan Tabligh Akbar dan peringatan Isra Mi'raj di Desa Taluduyunu Utara, termasuk pembagian minyak goreng kepada lebih dari 2.000 warga serta bantuan sembako bagi 360 masyarakat terdampak banjir di Desa Tuweya.

Tambang Nikel Konawe melaksanakan program untuk mendukung perayaan keagamaan dan hari besar nasional, kegiatan pendidikan dan kepemudaan, penguatan keamanan wilayah, serta peningkatan akses informasi publik melalui pengadaan perangkat Starlink di Desa Lalomerui. Program ini melibatkan 700.000 penerima manfaat di wilayah Kabupaten Konawe, Konawe Utara, dan Morowali dalam rangka peningkatan partisipasi masyarakat, penguatan sinergi antara perusahaan dan pemerintah daerah, serta terwujudnya hubungan sosial yang harmonis dan berkelanjutan di wilayah sekitar tambang.

Social and Culture

Tuhuk Bukit Gold Mine implemented programs including the construction and renovation of religious facilities, distribution of qurbani animals, support for cultural celebrations and local traditions, and humanitarian assistance for disaster-affected communities. Beneficiaries of these programs included religious groups in Ring 1, Ring 2, and Ring 3 areas, communities affected by flooding in Pesanggaran and Siliragung Subdistricts, as well as fisher groups and communities in villages surrounding the mine. The company also distributed 21 cows and 23 goats for qurbani to 29 mosques, prayer rooms, and 6 government institutions, and supported cultural events such as Petik Laut, Bersih Desa, Gandrung Sewu, and Tour de Ijen Banyuwangi. In addition, the company provided various social assistance programs, including 1,000 food packages for the Banyuwangi Anniversary, 500 packages for sanitation workers, and 294 packages through the Banyuwangi Berbagi program, as well as incentives for 10 staff members of Sumberagung Village.

Merdeka Tsingshan Indonesia implemented social and cultural activities benefiting 2,163 residents in Bahodopi Subdistrict and surrounding areas. The program supported sports, education, and religious activities such as inter-village competitions, Musabaqah Tilawatil Quran (MTQ), National Scout Day, and Indonesia's Independence Day celebrations, contributing to strengthening nationalism and developing youth potential in sports and youth activities.

Pani Gold Mine implemented social and religious programs aimed at strengthening social solidarity, community engagement, and the preservation of local traditions in the Pohuwato Regency mine surrounding areas, benefiting 4,698 individuals and 2,400 families. Activities included Ramadan Safari and Tumbilotohe events attended by 450 families, as well as a low-cost market program ahead of Eid al-Fitr to help 1,500 low-income families access essential goods at affordable prices. The company also distributed 14 qurbani animals through the Tebar Hewan Kurban program, benefiting 294 community members in Buntulia, Bulangita, and Teratai areas. Additional support was provided for Tabligh Akbar and Isra Mi'raj commemorations in Taluduyunu Utara Village, including the distribution of cooking oil to more than 2,000 residents and food aid for 360 flood-affected residents in Tuweya Village.

Konawe Nickel Mine implemented programs supporting religious and national holiday celebrations, education and youth activities, regional security strengthening, and improved public information access through the provision of Starlink devices in Lalomerui Village. The program involved 700,000 beneficiaries across Konawe, North Konawe, and Morowali Regencies, aimed at increasing community participation, strengthening synergy between the company and local governments, and fostering harmonious and sustainable social relations in the mine surrounding areas.



▲ Community groups supported by BSI



▲ Wayang Kulit (traditional Javanese shadow puppetry) show supported by BSI

Lingkungan

Tambang Emas Tujuh Bukit melaksanakan program lingkungan untuk meningkatkan kesadaran dan partisipasi masyarakat dalam menjaga kebersihan serta kelestarian lingkungan pesisir di sekitar tambang. Program ini melibatkan 27 anggota masyarakat yang tergabung dalam Kelompok Masyarakat Pengawas Generasi Pemancing Kidulan melalui kegiatan pengelolaan sampah dan pelestarian lingkungan.

Merdeka Tsingshan Indonesia melaksanakan kegiatan lingkungan untuk meningkatkan kesadaran masyarakat terhadap pengelolaan sampah dan pelestarian ekosistem pesisir. Dalam rangka memperingati *World Cleanup Day 2025*, perusahaan bersama Departemen *Environment* melaksanakan kegiatan Aksi Bersih Sampah di Pulau Langala yang melibatkan 52 peserta dari unsur masyarakat dan Badan Usaha Milik Desa (BUMDes).

Tambang Emas Pani melaksanakan program pengelolaan sumber daya air, peningkatan infrastruktur pertanian, serta pelestarian lingkungan di wilayah sekitar tambang. Program ini melibatkan 360 penerima manfaat, termasuk 120 keluarga petani di Kecamatan Duhiaada yang menggantungkan mata pencaharian pada sektor pertanian. Kegiatan dilaksanakan melalui pengerukan sedimen pada saluran irigasi untuk meningkatkan kapasitas aliran air menuju lahan persawahan masyarakat.

Tambang Nikel Konawe melaksanakan program penyiraman jalan di Desa Pondo bekerja sama dengan Badan Usaha Milik Desa (BUMDes) Pondo, yang melibatkan 8 penerima manfaat. Kegiatan ini bertujuan mengurangi debu di akses jalan menuju area operasional perusahaan sehingga menciptakan lingkungan yang lebih bersih dan sehat bagi masyarakat.

Environment

Tujuh Bukit Gold Mine implemented environmental programs to increase community awareness and participation in maintaining cleanliness and preserving coastal ecosystems around the mine. The program involved 27 community members from the Generasi Pemancing Kidulan Community Monitoring Group through activities related to waste management and environmental conservation.

Merdeka Tsingshan Indonesia carried out environmental initiatives aimed at increasing community awareness of waste management and coastal ecosystem conservation. In commemoration of *World Cleanup Day 2025*, the company together with the Environment Department organized a Clean-Up Action on Langala Island, involving 52 participants from local communities and Village-Owned Enterprises (BUMDes).

Pani Gold Mine implemented programs focusing on water resource management, agricultural infrastructure improvement, and environmental conservation in the areas surrounding the mine. The program involved 360 beneficiaries, including 120 farming households in Duhiaada Subdistrict whose livelihoods depend on the agricultural sector. Activities included sediment dredging in irrigation canals to improve water flow capacity to community rice fields.

Konawe Nickel Mine implemented a road watering program in Pondo Village in collaboration with BUMDes Pondo, involving 8 beneficiaries. This initiative aims to reduce dust along access roads leading to the company's operational areas, thereby creating a cleaner and healthier environment for the community.

Tambang Tembaga Wetar melaksanakan program pengelolaan sampah, pelestarian lingkungan, serta peningkatan kesadaran masyarakat terhadap praktik ramah lingkungan. Program ini melibatkan anak-anak sekolah, ibu rumah tangga, dan petani setempat melalui kegiatan pengelolaan sampah organik dan anorganik, pelibatan masyarakat dalam kegiatan reklamasi, serta sosialisasi dan edukasi pengelolaan limbah rumah tangga. Sebanyak 50% siswa SMP dan SMA, ibu rumah tangga, serta petani memperoleh sosialisasi dan pelatihan pengolahan sampah organik dan anorganik serta mampu mengimplementasikannya dalam kehidupan sehari-hari. Selain itu, sekitar 70% masyarakat telah mengurangi penggunaan pupuk kimia melalui praktik pertanian yang lebih ramah lingkungan.

Wetar Copper Mine implemented programs related to waste management, environmental conservation, and increasing community awareness of environmentally friendly practices. The program involved school children, housewives, and local farmers through activities such as organic and inorganic waste management, community participation in reclamation activities, and socialization and education on household waste management. As a result, 50% of junior and senior high school students, housewives, and farmers received training on organic and inorganic waste processing and were able to apply it in their daily lives. In addition, around 70% of community members have reduced the use of chemical fertilizers through more environmentally friendly agricultural practices.



▲ MTI collaborated with local community during World Cleanup Day 2025

Kelembagaan masyarakat

Tambang Emas Tujuh Bukit melaksanakan program peningkatan koordinasi dan komunikasi antara perusahaan dan pemerintah desa di wilayah sekitar tambang. Program ini dilaksanakan melalui pertemuan rutin dan koordinasi bulanan bersama Asosiasi Kepala Desa Kecamatan Pesanggaran yang melibatkan Pemerintah Desa Sumberagung, Sarongan, Kandangan, Sumbermulyo, dan Pesanggaran untuk membahas pelaksanaan program PPM.

Merdeka Tsingshan Indonesia melaksanakan program Penguatan Kelembagaan Insan Kesehatan Desa di Desa Makarti Jaya dan Labota untuk meningkatkan kapasitas kader kesehatan masyarakat. Program ini melibatkan 48 peserta yang terdiri dari bidan desa, kader posyandu, dan anggota PKK melalui pelatihan yang diselenggarakan bekerja sama dengan Puskesmas dan Dinas Kesehatan Kabupaten Morowali. Kegiatan dilaksanakan melalui pelatihan pengolahan makanan tambahan berbasis bahan pangan lokal untuk meningkatkan variasi menu bergizi bagi masyarakat.

Community Institutions

Tujuh Bukit Gold Mine implemented a program to strengthen coordination and communication between the company and village governments in areas surrounding the mine. The program was carried out through regular meetings and monthly coordination with the Pesanggaran Subdistrict Village Heads Association, involving the village governments of Sumberagung, Sarongan, Kandangan, Sumbermulyo, and Pesanggaran, to discuss the implementation of the CDE Program.

Merdeka Tsingshan Indonesia implemented the Village Health Personnel Institutional Strengthening Program in Makarti Jaya and Labota Villages to enhance the capacity of community health cadres. The program involved 48 participants, including village midwives, posyandu cadres, and PKK members, through training conducted in collaboration with the Community Health Center and the Morowali District Health Office. Activities included training on the preparation of supplementary food using locally sourced ingredients to increase the variety of nutritious menus for the community.

Tambang Emas Pani melaksanakan program penguatan kelembagaan masyarakat yang berfokus pada pengembangan kegiatan sosial, olahraga, serta dukungan sarana masyarakat di Kecamatan Buntulia, Kecamatan Marisa, dan Desa Hulawa dengan penerima manfaat utama terdiri atas atlet muda, ibu hamil, dan anak-anak yang memperoleh dukungan tidak langsung melalui fasilitas pelayanan kesehatan. Selain itu, perusahaan memberikan bantuan peralatan dan perlengkapan Posyandu di Desa Hulawa yang mendukung pelayanan kesehatan rutin bagi lebih dari 30 penerima manfaat, termasuk ibu hamil, anak stunting, dan anak dengan gizi kurang. Dukungan ini memperkuat kolaborasi antara Puskesmas Buntulia dan kader kesehatan desa dalam memberikan layanan kesehatan yang lebih optimal bagi masyarakat.

Tambang Nikel Konawe melaksanakan program kelembagaan masyarakat untuk memperkuat tata kelola sosial dan komunikasi dua arah antara perusahaan dan masyarakat di wilayah sekitar tambang. Program ini menjangkau lebih dari 180 penerima manfaat melalui berbagai kegiatan yang mencakup pertemuan rutin Komite Desa (KODES) yang diikuti oleh 26 perwakilan masyarakat dari 8 desa, pemberian insentif bagi anggota Komite Desa, serta dukungan kelembagaan bagi organisasi pelajar daerah seperti HIPPMAR dan IPMR yang masing-masing beranggotakan 45 dan 20 mahasiswa. Selain itu, perusahaan juga menyelenggarakan pertemuan dengan Himpunan Mahasiswa Kecamatan Oheo yang diikuti oleh 50 peserta guna memperkuat aspirasi dan partisipasi generasi muda.

Tambang Tembaga Wetar melaksanakan program penguatan kelembagaan masyarakat di Desa Lurang dan Desa Uhak untuk meningkatkan kapasitas pemerintah desa dan organisasi masyarakat dalam pengelolaan program pembangunan lokal. Program ini melibatkan 50 penerima manfaat melalui kegiatan pendampingan pemerintah desa dan pengurus yayasan dalam pelaksanaan Musyawarah Perencanaan Pembangunan (Musrenbang) serta pengelolaan manajemen penjualan produk lokal kepada penyedia catering perusahaan.

Pani Gold Mine implemented a community institutional strengthening program focused on developing social and sports activities as well as supporting community facilities in Buntulia Subdistrict, Marisa Subdistrict, and Hulawa Village. The main beneficiaries included young athletes, pregnant women, and children, who received indirect support through improved health service facilities. In addition, the company provided equipment and supplies for Posyandu services in Hulawa Village, supporting routine health services for more than 30 beneficiaries, including pregnant women, stunted children, and undernourished children. This support strengthened collaboration between Buntulia Community Health Center (Puskesmas Buntulia) and village health cadres in delivering more optimal health services to the community.

Konawe Nickel Mine implemented a community institutional program to strengthen social governance and two-way communication between the company and communities in the mine surrounding areas. The program reached more than 180 beneficiaries through activities such as regular Village Committee meetings attended by 26 community representatives from 8 villages, provision of incentives for Village Committee members, and institutional support for regional student organizations, including HIPPMAR and IPMR, with 45 and 20 student members respectively. The company also organized a meeting with the Oheo Subdistrict Student Association, attended by 50 participants, to strengthen the aspirations and participation of youth.

Wetar Copper Mine implemented a community institutional strengthening program in Lurang and Uhak Villages to enhance the capacity of village governments and community organizations in managing local development programs. The program involved 50 beneficiaries through mentoring for village government officials and foundation administrators in the implementation of the Village Development Planning Forum (Musrenbang) as well as management of local product sales to the company's catering providers.



▲ Regular meeting with community representatives at BSI

Infrastruktur [203-1][203-2][14.9.3]

Merdeka melaksanakan program pembangunan infrastruktur untuk meningkatkan aksesibilitas dan kualitas sarana prasarana masyarakat di wilayah sekitar tambang. Seluruh pembangunan infrastruktur di Merdeka dilakukan dan diselesaikan di tahun 2025 dengan jangka waktu manfaat dari program adalah lebih dari lima tahun. Hingga tahun 2025, program di Tambang Emas Tujuh Bukit memberikan manfaat bagi 10.600 orang melalui kerja sama dengan lima desa di wilayah ring 1 dan dua belas desa di wilayah ring 2 Kecamatan Pesanggaran. Kegiatan dilaksanakan melalui pavingisasi dan pengaspalan jalan di sejumlah titik, pembangunan saluran irigasi dan drainase, pengerasan jalan usaha tani di Dusun Pancer, perbaikan Jembatan Buk Petung di Desa Bangorejo, serta peningkatan fasilitas ruang terbuka hijau di Desa Sambimulyo.

Merdeka Tsingshan Indonesia melaksanakan program JALU (Jalan Mulus) Desa untuk meningkatkan aksesibilitas dan mendorong pertumbuhan ekonomi masyarakat di wilayah sekitar tambang. Hingga tahun 2025, program ini memberikan manfaat kepada sekitar 10.500 orang, termasuk masyarakat Desa Makarti Jaya dan Labota, pelaku usaha pada 66 kios, serta 991 karyawan perusahaan dan kontraktor. Melalui kegiatan perbaikan jalan desa, program ini berhasil meningkatkan akses masyarakat terhadap kebutuhan pokok dan layanan publik, meningkatkan keamanan berkendara, serta meningkatkan nilai ekonomi lahan di sekitar wilayah tersebut.

Tambang Emas Pani melaksanakan program pembangunan infrastruktur yang berfokus pada peningkatan akses terhadap fasilitas dasar dan dukungan terhadap kegiatan sosial keagamaan masyarakat. Hingga tahun 2025, program ini memberikan manfaat kepada 1.810 warga di Desa Bulangita, Siduwonge, Hulawa, serta wilayah Kabupaten Pohuwato. Kegiatan dilaksanakan melalui program Manunggal Air bersama KODIM 1313/Pohuwato di Desa Bulangita dan Siduwonge yang menyediakan akses air bersih bagi 35 keluarga, serta renovasi Masjid Agung Baiturrahim Pohuwato yang memberikan manfaat bagi lebih dari 1.700 warga dalam melaksanakan kegiatan ibadah. Selain itu, perusahaan turut mendukung pengembangan kawasan perumahan Kampung Baru di Desa Hulawa melalui kunjungan Wakil Menteri Perumahan dan Kawasan Permukiman.

Tambang Nikel Konawe melaksanakan program pembangunan infrastruktur untuk meningkatkan aksesibilitas dan kualitas layanan publik di wilayah sekitar tambang. Hingga tahun 2025, program ini memberikan manfaat bagi 6.700 masyarakat di Kabupaten Konawe, Konawe Utara, dan Morowali melalui berbagai kegiatan pembangunan dan pemeliharaan fasilitas umum. Kegiatan utama meliputi perbaikan jalan utama Lalomerui-Walandawe-Routa, pembangunan balai kelurahan dan aula pertemuan masyarakat, renovasi sekolah dasar, serta restorasi saluran irigasi pertanian di Tirawonua.

Infrastructure

Merdeka implemented infrastructure development programs to improve accessibility and the quality of community facilities and infrastructure in areas surrounding the mine. All infrastructure development at Merdeka was carried out and completed in 2025, with a program benefit period of more than five years. As of 2025, the program at Tujuh Bukit Gold Mine benefited 10,600 people through collaboration with five villages in the Ring 1 area and twelve villages in the Ring 2 area of Pesanggaran Subdistrict. Activities included road paving and asphalt paving at several locations, construction of irrigation and drainage channels, strengthening of farm access roads in Pancer Hamlet, repair of Buk Petung Bridge in Bangorejo Village, and improvement of green open space facilities in Sambimulyo Village.

Merdeka Tsingshan Indonesia implemented the JALU (Jalan Mulus) Village Program to improve accessibility and support community economic growth in areas surrounding the mine. As of 2025, the program benefited approximately 10,500 people, including residents of Makarti Jaya and Labota Villages, business operators from 66 kiosks, as well as 991 company and contractor employees. Through village road improvement activities, the program enhanced community access to basic necessities and public services, improved road safety, and increased land economic value in the surrounding area.

Pani Gold Mine implemented infrastructure development programs focusing on improving access to basic facilities and supporting community social and religious activities. As of 2025, the program benefited 1,810 residents in Bulangita, Siduwonge, and Hulawa Villages, as well as the wider Pohuwato Regency area. Activities included the Manunggal Air program in collaboration with KODIM 1313/Pohuwato in Bulangita and Siduwonge Villages, which provided clean water access for 35 families, as well as the renovation of the Baiturrahim Grand Mosque in Pohuwato, benefiting more than 1,700 residents in carrying out religious activities. In addition, the company supported the development of the Kampung Baru residential area in Hulawa Village through a visit by the Deputy Minister of Housing and Settlement Areas.

Konawe Nickel Mine implemented infrastructure development programs to improve accessibility and the quality of public services in areas surrounding the mine. As of 2025, the program benefited 6,700 residents in Konawe, North Konawe, and Morowali Regencies through various public facility construction and maintenance activities. Key initiatives included the improvement of the Lalomerui-Walandawe-Routa main road, construction of a subdistrict office building and community meeting hall, renovation of an elementary school, and restoration of agricultural irrigation channels in Tirawonua.



▲ Road infrastructure repairs supported by BSI

Realisasi Dana Program PPM Merdeka

[203-1][203-2][14.9.4][KPI B8.2]

Sepanjang tahun 2025, total dana program PPM yang direalisasikan oleh seluruh site Merdeka mencapai Rp90,3 miliar atau setara dengan 5,69 juta dolar AS, dengan rincian sebagai berikut:

No	Pilar PPM CDE Pillars	Dana Disalurkan Fund Disbursed (USD)
1	Pendidikan Education	846,854
2	Kesehatan Health	295,704
3	Tingkat Pendapatan Riil atau Pekerjaan Real Income Level or Employment	1,517,827
4	Kemandirian Ekonomi Economic Independence	408,087
5	Sosial dan Budaya Social and Cultural	388,774
6	Lingkungan Environment	122,178
7	Kelembagaan Masyarakat Community Capacity Building	117,798
8	Pembangunan Infrastruktur Infrastructure Development	1,989,963
Total		5,687,184

Merdeka's CDE Program Fund Allocation

Throughout 2025, the total PPM program funds realized across all Merdeka sites reached IDR 90.3 billion, equivalent to 5.69 million USD with the following details:

Pemberdayaan Pemasok Lokal [204-1][14.9.5][B.1][E.5]

Merdeka mengutamakan pemasok lokal untuk berkontribusi dalam peningkatan pendapatan masyarakat dan pemerintah daerah. Merdeka mendefinisikan pemasok lokal sebagai perusahaan yang berbadan hukum Indonesia atau bukan berbadan hukum, yang didirikan dan beroperasi di wilayah Republik Indonesia.

Meskipun menghadapi berbagai tantangan, seperti keterbatasan kompetensi dan tata kelola pemasok, Merdeka terus berupaya memperkuat kerja sama dengan pemasok lokal dan nasional. Melalui kolaborasi antara Divisi Pengadaan dan Divisi Community, Merdeka berkomitmen untuk mendorong pengembangan kompetensi pemasok lokal.

Kebijakan Masyarakat menyatakan bahwa Merdeka berkomitmen untuk mendorong pembangunan ekonomi lokal melalui dukungan terhadap pengadaan lokal dan mengutamakan kesempatan kerja bagi masyarakat lokal. Kebijakan Masyarakat dapat diakses di: [Merdeka Copper Gold - Documents](#).

Pada tahun 2025, Merdeka bekerja sama dengan 518 pemasok lokal dengan nilai transaksi sebesar 0,72% dari total pengadaan. Selain itu, Merdeka bermitra dengan 2.564 pemasok nasional dengan nilai transaksi mencapai 95,85%. Sementara itu, pengadaan dari pemasok internasional melibatkan 344 pemasok dengan nilai transaksi sebesar 3,43% dari total pengadaan. Dibandingkan dengan tahun 2024, total pengadaan pada tahun 2025 untuk pemasok lokal, nasional, dan internasional meningkat masing-masing sebesar 115%, 313%, dan 288%. Hal ini menunjukkan kontribusi Merdeka terhadap perputaran roda ekonomi di wilayah operasionalnya.

Supporting Local Suppliers

Merdeka prioritizes local suppliers as part of its efforts to contribute to increased community income and regional economic development. Merdeka defines local suppliers as companies, whether incorporated or unincorporated, that are established and operate within the territory of the Republic of Indonesia.

Despite facing various challenges, including limitations in supplier competencies and governance, Merdeka continues to strengthen cooperation with both local and national suppliers. Through collaboration between the Procurement Division and the Community Division, Merdeka is committed to supporting the capacity development and competency enhancement of local suppliers.

The Community Policy states that Merdeka is committed to promoting local economic development by supporting local procurement and prioritizing employment opportunities for local communities. The Community Policy is publicly accessible at: [Merdeka Copper Gold - Documents](#).

In 2025, Merdeka worked with 518 local suppliers, accounting for 0.72% of total procurement value. In addition, Merdeka partnered with 2,564 national suppliers, representing 95.85% of total procurement value. Meanwhile, procurement from international suppliers involved 344 suppliers, contributing 3.43% of total procurement value. Compared to 2024, total procurement in 2025 for local, national, and international suppliers increased by 115%, 313%, and 288%, respectively. This reflects Merdeka's contribution to economic activity in its areas of operation.

Respecting Human Rights

Menghormati Hak Asasi Manusia

▲ Traditional dance performance supported by BSI

Menghormati Hak Asasi Manusia

Respecting Human Rights

2025 Performance

Global initiatives participations

Submitted the 2025 Communication on Progress (CoP) to the UN Global Compact

Security and Human Rights

Until the end of 2025, the participation rate in security and human rights training reached 85% at Konawe Mine, 32% at Pani Gold Mine, and 35% at AIM Plant

Human Rights Due Diligence

Merdeka's subsidiary, PT Sulawesi Cahaya Mineral, established a Human Rights Working Group and developed a draft Human Rights Management System Manual, which includes Human Rights Due Diligence (HRDD) procedures.

2026 Target

Global initiatives participations

Submit Communication on Progress (CoP) in 2026 to the UN Global Compact

Security and Human Rights

Provide human rights training for security officers at all sites

Human Rights Training

Provide human rights training to employees and business partners

Human Rights Due Diligence

Conduct human rights due diligence at SCM

Human Rights Monitoring

Increase percentage of major contractors screened using human rights indicators



Pendekatan Manajemen [2-23][14.19.1]

Menyadari bahwa industri pertambangan di Indonesia kerap berhadapan dengan isu-isu hak asasi manusia (HAM), Merdeka menempatkan penghormatan terhadap HAM sebagai dasar utama dalam menjalankan kegiatan usahanya. Pendekatan ini menjadi bagian penting dari strategi keberlanjutan Merdeka, karena perusahaan meyakini bahwa keberlanjutan hanya dapat terwujud jika operasi bisnis menghormati hak-hak setiap individu. Komitmen tersebut dituangkan secara jelas dalam Kebijakan HAM Merdeka.

Kebijakan ini disusun berdasarkan Prinsip-Prinsip Panduan PBB tentang Bisnis dan Hak Asasi Manusia (*United Nations Guiding Principles on Business and Human Rights*) serta mencakup hak asasi manusia yang diakui secara internasional. Ini termasuk Deklarasi Universal Hak Asasi Manusia, Kovenan Internasional tentang Hak-Hak Sipil dan Politik, Kovenan Internasional tentang Hak Ekonomi, Sosial, dan Budaya, serta prinsip-prinsip mendasar dalam Deklarasi ILO mengenai Hak-Hak dan Prinsip-Prinsip Mendasar di Tempat Kerja.

Management Approach

Recognizing that the mining industry in Indonesia often faces human rights (HR) challenges, Merdeka places respect for human rights as a fundamental principle in conducting its business operations. This approach forms an essential part of Merdeka's sustainability strategy, as the company believes that true sustainability can only be achieved when business operations uphold the rights of every individual. This commitment is clearly articulated in Merdeka's Human Rights Policy.

This policy is based on the United Nations Guiding Principles on Business and Human Rights and encompasses internationally recognized human rights frameworks, including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social, and Cultural Rights, and the ILO Declaration on Fundamental Principles and Rights at Work.

Sebagai wujud tanggung jawabnya terhadap penghormatan hak asasi manusia, Merdeka menjunjung tinggi hak-hak setiap individu, termasuk kelompok rentan seperti masyarakat adat, perempuan, anak-anak, minoritas agama dan etnis, serta penyandang disabilitas. Prinsip kesetaraan dan nondiskriminasi menjadi pedoman utama dalam seluruh interaksi dengan pemangku kepentingan.

Merdeka memastikan penerapan dan pengawasan Kebijakan HAM dilakukan secara efektif melalui struktur tata kelola yang terorganisir dengan baik. Pengawasan tertinggi berada di bawah tanggung jawab Direksi, yang memberikan arahan dan persetujuan terhadap program-program terkait HAM. Komite Keberlanjutan memantau secara berkala pelaksanaan dan capaian kinerja HAM, kemudian melaporkannya kepada Direksi. Perusahaan memantau efektivitas pelaksanaan Kebijakan Hak Asasi Manusia melalui kerangka pemantauan terstruktur yang mencakup audit internal, penilaian kepatuhan kontraktor, serta mekanisme pengaduan formal, baik melalui Whistleblowing System (WBS) maupun mekanisme pengaduan masyarakat. Melalui departemen terkait di site dan kantor pusat Merdeka, Perusahaan juga melacak efektivitas pelaksanaan Kebijakan HAM Merdeka dengan menggunakan indikator kinerja seperti tingkat penyelesaian pengaduan, cakupan pelatihan hak asasi manusia, serta kinerja kepatuhan HAM oleh kontraktor. Di SCM, pemantauan kinerja HAM dilakukan oleh Kelompok Kerja HAM SCM yang telah dibentuk, yang terdiri dari Departemen Compliance, Human Resources & General Affairs, Hubungan Masyarakat, Asset Protection, Commercial & IT, serta Production & Cost.

Merdeka menerapkan strategi komprehensif untuk memastikan penghormatan terhadap HAM dalam seluruh kegiatan operasionalnya. Strategi ini mencakup uji tuntas HAM, yaitu proses identifikasi dan penilaian risiko serta dampak potensial HAM dari aktivitas operasional secara berkelanjutan. Selain itu, Merdeka menyediakan mekanisme pengaduan bagi karyawan, masyarakat, dan pemangku kepentingan lainnya untuk melaporkan isu terkait HAM. Pelatihan dan peningkatan kesadaran tentang HAM juga diberikan kepada karyawan dan pihak terkait.

Sebagai bagian dari komitmennya dalam menghormati HAM, Merdeka memandang keterlibatan pemangku kepentingan termasuk masyarakat, organisasi masyarakat sipil, dan pihak terkait lainnya sebagai elemen penting dalam pelaksanaan kebijakan HAM. Selain itu, Merdeka menjalin kerja sama dengan para pemasok untuk memastikan penerapan prinsip-prinsip HAM dalam seluruh rantai pasok, mencakup penghormatan terhadap hak-hak pekerja, penyediaan lingkungan kerja yang aman dan sehat, kebebasan berserikat, serta pencegahan kerja paksa, pekerja anak, dan perdagangan manusia.

As part of its responsibility to uphold human rights, Merdeka respects and values the rights of every individual, including vulnerable groups such as Indigenous peoples, women, children, religious and ethnic minorities, and persons with disabilities. The principles of equality and non-discrimination serve as key guidelines in all interactions with stakeholders.

Merdeka ensures the effective implementation and oversight of its Human Rights Policy through a well-organized governance structure. The Board of Directors holds the highest level of responsibility for overseeing the policy, providing direction, and approving related human rights programs. The Sustainability Committee regularly monitors the implementation and performance of human rights initiatives and reports the results to the Board. The Company monitors the effectiveness of the implementation of its Human Rights Policy through a structured monitoring framework that includes internal audits, contractor compliance assessments, and formal grievance mechanisms, both through the Whistleblowing System (WBS) and community complaint mechanisms. Through relevant departments at site level and at Merdeka's head office, the Company also tracks the effectiveness of the implementation of Merdeka's Human Rights Policy using performance indicators such as grievance resolution rates, human rights training coverage, and contractor compliance with human rights requirements. At SCM, human rights performance monitoring is carried out by the established SCM Human Rights Working Group, which comprises the Compliance Department, Human Resources & General Affairs, Corporate Communications, Asset Protection, Commercial & IT, and Production & Cost departments.

Merdeka employs a comprehensive strategy to ensure the respect of human rights across its operations. This includes Human Rights Due Diligence, a continuous process to identify, assess, and mitigate potential human rights risks associated with business activities. Grievance Mechanisms, an accessible channels for employees, communities, and other stakeholders to report human rights concerns. Training and Awareness Programs, an initiative to enhance understanding and capacity building on human rights for employees and relevant stakeholders.

As part of its commitment to respecting human rights (HR), Merdeka views stakeholder engagement including with communities, civil society organizations, and other relevant parties as a vital element in the implementation of its Human Rights Policy. In addition, Merdeka collaborates with its suppliers to ensure the application of human rights principles throughout the supply chain, covering respect for workers' rights, the provision of a safe and healthy work environment, freedom of association, and the prevention of forced labor, child labor, and human trafficking.

Merdeka juga berkomitmen untuk mencegah konflik dan menghindari tindakan kekerasan terhadap masyarakat serta pemangku kepentingan lainnya. Perusahaan memastikan bahwa rantai pasokannya tidak terlibat dalam konflik atau berkontribusi terhadap pelanggaran HAM. Selain itu, Merdeka memprioritaskan perlindungan hak-hak masyarakat yang terdampak oleh kegiatan operasionalnya, termasuk akses terhadap sumber air bersih serta hak atas lingkungan yang sehat. Kebijakan HAM Merdeka dapat diakses di [Merdeka Copper Gold - Documents](#).

Mengintegrasikan Komitmen Penghormatan Hak Asasi Manusia [2-24]

Merdeka mengintegrasikan komitmen terhadap penghormatan hak asasi manusia ke dalam seluruh kebijakan dan praktik perusahaan, yang tercermin dalam Kode Etik, Kebijakan Sumber Daya Manusia, Kebijakan Masyarakat, serta Kode Etik Keberlanjutan Pemasok.

Code of Conduct, Policies, Guidelines and Standards	Relevant Stakeholders/ Areas of Human Rights Risks
Code of Conduct, Health and Safety Policy and Human Resources Policies (Diversity, Equality, and Inclusivity Policy, Anti-Discrimination and Gender Equality Policy, Anti Child Labor and Forced Labor Policy, Freedom of Association and Protection of Organization Policy, Conducive and Positive Work Environment Policy, Speaking Up and Anti-Retaliation Policy)	Employees and suppliers <ul style="list-style-type: none"> • Right to life • Right to an adequate standard of living • Right to just and favorable conditions of work • Right to equality and non-discrimination • Rights not to be subjected to child labor and forced labor • Rights to freedom of association and collective bargaining • Right to a safe and healthy working environment
Community Policy	Communities Including access to water, land rights, a clean and healthy environment and the rights of communities near our operations such as local communities, indigenous people, and other vulnerable groups
Supplier Sustainability Code of Conduct	Suppliers <ul style="list-style-type: none"> • Right to adequate standard of living • Right to just and favourable conditions of work • Right to equality and non-discrimination • Rights not to be subjected to child labor and forced labor • Rights to freedom of association and collective bargaining • Right to safe and healthy working environment • Right to life
Environmental Policy	Environment Risks of environmental degradation on natural resource availability, human health, land and resource rights.

Uji Tuntas Hak Asasi Manusia [2-23][2-25]

Dalam menjalankan komitmennya terhadap penghormatan HAM, Merdeka menerapkan berbagai langkah proaktif, termasuk pelaksanaan uji tuntas HAM yang selaras dengan Prinsip-Prinsip Panduan PBB tentang Bisnis dan HAM (UNGPs). Melalui proses ini, perusahaan mengidentifikasi dan menilai potensi risiko serta dampak operasional terhadap HAM, kemudian mengintegrasikan hasilnya ke dalam kebijakan dan prosedur internal. Merdeka juga secara rutin memantau efektivitas langkah mitigasi dan memastikan hasil penanganan dampak disampaikan secara terbuka kepada para pemangku kepentingan.

Merdeka is committed to avoiding conflict and violence in its interactions with communities and stakeholders. The company also ensures that its supply chain remains free from any involvement in conflict or human rights violations. Additionally, Merdeka prioritizes the respect of community rights, including access to water resources and a healthy environment. Merdeka Human Rights Policy can be accessed at [Merdeka Copper Gold - Documents](#).

Integration of Human Rights Commitments

Merdeka integrates its commitment to respecting human rights into all company policies and practices, as reflected in the Code of Ethics, Human Resources Policy, Community Policy, and Supplier Sustainability Code of Conduct.

Human Rights Due Diligence

In fulfilling its commitment to respecting human rights, Merdeka implements a range of proactive measures, including conducting human rights due diligence aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs). Through this process, the company identifies and assesses potential risks and operational impacts on human rights, and integrates the findings into relevant internal policies and procedures. Merdeka also regularly monitors the effectiveness of mitigation measures and ensures that the outcomes of impact management are communicated transparently to stakeholders.

Sebagai bagian dari penguatan implementasi penghormatan Hak Asasi Manusia (HAM), Merdeka menyelenggarakan pelatihan terkait HAM dan Manual Sistem Manajemen Penghormatan HAM kepada 11 anggota Kelompok Kerja HAM di Tambang Nikel Konawe.

Pada tahun 2025, anak perusahaan Merdeka, PT Sulawesi Cahaya Mineral, membentuk Kelompok Kerja Hak Asasi Manusia dan menyusun draf Manual Sistem Manajemen Hak Asasi Manusia, yang mencakup prosedur Uji Tuntas Hak Asasi Manusia (Human Rights Due Diligence/HRDD).

Merdeka melakukan penilaian dampak potensial dan aktual HAM melalui program Penilaian Risiko Bisnis dan HAM (PRISMA) oleh Kementerian Hukum dan HAM Republik Indonesia di tahun 2024-2025. PRISMA, sebuah aplikasi berbasis web, membantu perusahaan dalam menganalisis potensi risiko dampak bisnis terhadap HAM. Melalui aplikasi ini, Merdeka melengkapi kuesioner penilaian risiko HAM yang kemudian dievaluasi oleh Kementerian Hukum dan HAM. Penilaian ini mencakup 12 kategori, yakni Kebijakan HAM, tenaga kerja, kondisi kerja, serikat pekerja, privasi, diskriminasi, lingkungan, agraria dan masyarakat adat, tanggung jawab sosial perusahaan, mekanisme pengaduan, rantai pasokan, dan dampak bagi perusahaan. Berdasarkan hasil evaluasi Kementerian Hukum dan HAM, Merdeka mendapatkan skor 81 yang masuk dalam kategori tertinggi PRISMA yaitu kategori "sesuai" (skor 76-100). Atas pencapaian skor tersebut, Merdeka menerima Piagam Penghargaan dari Menteri Hak Asasi Manusia yang diserahkan pada 19 September 2025. Selama tahun 2025, tidak terdapat laporan yang mengarah pada indikasi kerja paksa, pekerja anak, diskriminasi dan pengambilalihan lahan secara paksa. [F.19] [409-1][14.19.2][414-1][14.17.9][414-2][14.17.10]

As part of strengthening the implementation of Human Rights (HR) respect, Merdeka conducted Human Rights and Human Rights Management System Manual training for 11 members of the Human Rights Working Group at Konawe Nickel Mine.

In 2025, Merdeka's subsidiary, PT Sulawesi Cahaya Mineral, established a Human Rights Working Group and developed a draft Human Rights Management System Manual, which includes Human Rights Due Diligence (HRDD) procedures.

Merdeka assessed its potential and actual human rights impacts through Business and Human Rights Risk Assessment (PRISMA) program by the Ministry of Law and Human Rights of the Republic of Indonesia in 2024-2025. PRISMA, a web-based platform, assists companies in assessing the potential human rights risks associated with their business operations. Through this platform, Merdeka completed a comprehensive human rights risk assessment questionnaire, which was subsequently evaluated by the Ministry of Law and Human Rights. The assessment covered 12 key categories: human rights policies, labor practices, working conditions, trade union rights, privacy, discrimination, environmental impact, land and indigenous peoples' rights, corporate social responsibility, grievance mechanisms, supply chain practices, and the overall impact on the company. Based on this achievement, Merdeka received a Certificate of Appreciation from the Minister of Human Rights, which was presented on 19 September 2025. Based on the assessment, Merdeka received a score of 81, placing it in PRISMA's highest category, "Compliant" (score 76-100). In 2025, no reports of forced labor, discrimination, or land grabbing were received.



▲ Human Rights training for security personnel at MTI

HAM dan Keamanan [14.14.1]

Merdeka menerapkan sistem pengamanan humanis berbasis penghormatan terhadap HAM yang dirancang untuk melindungi pekerja, fasilitas, dan aset perusahaan. Perusahaan memahami bahwa petugas keamanan kerap menghadapi situasi kompleks, sehingga sistem pengamanan yang diterapkan berlandaskan prinsip HAM guna menghindari tindakan kekerasan serta membangun hubungan yang harmonis dengan masyarakat sekitar.

Pelatihan Hak Asasi Manusia untuk Petugas Keamanan [2-24][410-1][14.14.2]

Pada tahun 2025, Merdeka menyelenggarakan pelatihan Hak Asasi Manusia (HAM) di Tambang Emas Pani, Pabrik AIM, dan Tambang Nikel Konawe. Pelatihan ini bertujuan untuk meningkatkan pemahaman personel keamanan mengenai praktik pengamanan yang menghormati HAM serta dampak dan risikonya dalam operasional pertambangan.

Hingga akhir 2025, sebanyak 21 petugas pengamanan dari Pabrik AIM, 170 petugas dari Tambang Nikel Konawe, dan 31 petugas dari Tambang Emas Pani telah mengikuti pelatihan HAM. Di Tambang Nikel Konawe, tingkat partisipasi mencapai 85%, sementara pada Tambang Emas Pani dan Pabrik AIM sebesar masing-masing 32% dan 35%.

Pelatihan ini diselenggarakan oleh Departemen ESG & Perubahan Iklim Merdeka maupun Departemen Asset Protection yang memiliki kompetensi dalam isu HAM. Materi pelatihan mencakup definisi HAM, regulasi nasional dan internasional terkait HAM, isu-isu HAM dalam sektor pertambangan, studi kasus pelanggaran HAM, serta langkah-langkah pencegahan dan mitigasi untuk memastikan praktik pengamanan yang sesuai dengan prinsip HAM.



▲ Human Rights training for security personnel at MTI

Security and Human Rights

Merdeka implements a human-centered security system based on respect for human rights, aimed at safeguarding workers, facilities, and company assets. Recognizing that security personnel often encounter complex situations, the company ensures its security practices are grounded in human rights principles, striving to prevent violence and foster positive relationships with surrounding communities.

Human Rights Training for Security Personnel

In 2025, Merdeka conducted human rights training at the Pani Gold Mine, AIM Plant, and Konawe Nickel Mine. This training was designed to enhance security personnel's understanding of human rights-based security practices and the associated impacts and risks within mining operations.

As of the end of 2025, 21 security personnel from AIM Plant, 170 personnel from Konawe Nickel Mine, and 31 personnel from Pani Gold Mine had participated in human rights training. At Konawe Nickel Mine, the participation rate reached 85%, while participation at Pani Gold Mine and AIM Plant reached 32% and 35%, respectively.

The training was organized by Merdeka's ESG & Climate Change Department and Asset Protection Department, which possesses expertise in human rights matters. The curriculum covered key topics including the definition of human rights, national and international human rights regulations, human rights challenges in the mining sector, case studies on human rights violations, and preventative and mitigation strategies to ensure security practices are in line with human rights principles.



HAM dan Pemasok [414-1][14.17.9]

Merdeka berkomitmen untuk memastikan penghormatan HAM di seluruh rantai pasoknya. Oleh karena itu, seluruh mitra bisnis dan kontraktor diwajibkan untuk mematuhi standar HAM yang tinggi sebagaimana tercantum dalam Kode Etik Keberlanjutan Pemasok. Kode etik ini menjadi salah satu aspek utama dalam proses seleksi dan evaluasi mitra bisnis serta pemasok. Pada tahun 2025, Divisi Pengadaan telah menyeleksi 51 pemasok utama (100%) dengan menggunakan indikator Sistem Manajemen Kontraktor (CMS) yang mencakup aspek HAM.



▲ Human Rights training for contractors at Pani Gold Mine

Untuk memperkuat implementasi penghormatan HAM di tingkat pemasok, Merdeka menyelenggarakan pelatihan prinsip-prinsip bisnis dan HAM sesuai dengan *United Nations Guiding Principles on Business and Human Rights* di Tambang Emas Pani, yang diikuti oleh 27 perwakilan dari kontraktor utama.

Human Rights and Suppliers

Merdeka is dedicated to ensuring the respect for human rights across its entire supply chain. As part of this commitment, all business partners and contractors are required to comply with stringent human rights standards as outlined in the Supplier Sustainability Code of Ethics. This code serves as a crucial component of the selection and evaluation process for business partners and suppliers. In 2025, the Procurement Division evaluated and selected 51 major suppliers (100%) using the Contractor Management System (CMS), which incorporates human rights criteria.

To further promote the integration of human rights principles at the supplier level, Merdeka organized a training session on Business and Human Rights Principles in accordance with the United Nations Guiding Principles on Business and Human Rights at Pani Gold Mine. The training was attended by 27 representatives from main contractors.



▲ Human Rights training for contractors at Pani Gold Mine

Sistem pelaporan Pelanggaran dan Mekanisme Pengaduan Masyarakat [2-25][2-26]

Merdeka berkomitmen untuk mengidentifikasi, menindaklanjuti, dan menangani dampak-dampak HAM yang berpotensi timbul akibat kegiatan operasionalnya. Untuk memastikan proses pemulihan berjalan efektif, perusahaan telah mengembangkan mekanisme penyampaian pengaduan, termasuk Sistem Pelaporan Pelanggaran (Whistleblowing System/WBS), yang dapat diakses oleh karyawan, pekerja mitra bisnis, serta masyarakat umum.

Sistem WBS Merdeka didasarkan pada prinsip transparansi, akuntabilitas, dan perlindungan pelapor. Mekanisme ini menjamin anonimitas, kerahasiaan laporan, serta perlindungan terhadap pelapor dari tindakan pembalasan. Pelaporan dapat dilakukan melalui situs Speak Up Merdeka di <https://Merdeka.whispli.com/SpeakUp>, yang dikelola oleh konsultan independen.

Selain WBS, entitas anak Merdeka juga menyediakan mekanisme pengaduan bagi masyarakat, termasuk pengaduan terkait pelanggaran HAM. Masyarakat dapat menyampaikan pengaduan kepada Divisi Masyarakat melalui formulir, diskusi langsung, telepon, atau email. Pengaduan yang diterima akan dicatat dan diberikan nomor referensi untuk mempermudah identifikasi. Selanjutnya, tim Community akan melakukan analisis melalui wawancara dan observasi guna menentukan validitas pengaduan. Jika pengaduan dianggap sah, departemen terkait akan dilibatkan untuk mencari solusi yang tepat.

Setelah tindak lanjut dilakukan melalui investigasi dan konsultasi dengan pihak terkait, laporan hasil penyelesaian pengaduan akan dikomunikasikan kepada masyarakat terdampak. Jika solusi yang ditawarkan diterima, kesepakatan penyelesaian akan didokumentasikan. Namun, jika masih ada ketidakpuasan, masyarakat dapat mengajukan banding kepada manajemen eksekutif.

Komitmen Merdeka dalam Penghormatan HAM di Tingkat Global dan Nasional

Sejak bergabung dengan UN Global Compact pada tahun 2022, Merdeka secara konsisten menyampaikan Communication on Progress (CoP) tahunannya, termasuk pada tahun 2025. CoP tidak hanya menjadi kewajiban pelaporan, tetapi juga mencerminkan komitmen Merdeka terhadap transparansi, akuntabilitas, dan implementasi praktik bisnis yang berkelanjutan, khususnya dalam penerapan Sepuluh Prinsip UN Global Compact.

Merdeka berkomitmen untuk menghormati hak asasi manusia dalam pelaksanaan praktik pengamanan Perusahaan. Untuk itu, Merdeka mengadopsi Pedoman Prinsip-Prinsip Sukarela tentang Keamanan dan Hak Asasi Manusia (Voluntary Principles on Security and Human Rights – VPSHR). Sebagai langkah awal, Merdeka telah mengikuti pelatihan dasar VPSHR

Whistleblowing System and Community Grievance Mechanism

Merdeka is committed to identifying, addressing, and managing human rights impacts that may arise from its operational activities. To ensure the effectiveness of remediation processes, the company has developed a grievance mechanism, including the Whistleblowing System (WBS), accessible to employees, business partner workers, and the community.

The Merdeka WBS is based on the principles of transparency, accountability, and protection for whistleblowers. This mechanism guarantees anonymity, confidentiality of reports, and protection against retaliation. Reports can be made through Merdeka's Speak Up site at <https://Merdeka.whispli.com/SpeakUp>, managed by an independent consultant.

In addition to the WBS, Merdeka's subsidiaries provide grievance mechanisms for the community, including those related to human rights violations. Grievances can be submitted to the Community Division through various channels, such as forms, direct discussions, phone calls, or email. Each grievance is recorded and assigned a reference number for easy tracking. The Community team then conducts an analysis through interviews and observations to assess the validity of the grievance. If deemed valid, the relevant departments are engaged to develop an appropriate resolution.

Following the investigation and consultation with relevant parties, the resolution outcome is communicated to the affected communities. If the proposed solution is accepted, a formal settlement agreement is documented. However, if dissatisfaction remains, the community has the right to escalate the issue to executive management.

Merdeka's Commitment to Human Rights at the Global and National Levels

Since joining the UN Global Compact in 2022, Merdeka has consistently submitted its annual Communication on Progress (CoP), including in 2025. Beyond being a reporting obligation, the CoP underscores Merdeka's dedication to transparency, accountability, and the integration of sustainable business practices, particularly in aligning with the Ten Principles of the UN Global Compact.

Merdeka is committed to respecting human rights in the implementation of the Company's security practices. To this end, Merdeka adopts the Voluntary Principles on Security and Human Rights (VPSHR). As an initial step, Merdeka has participated in basic VPSHR training delivered by experienced external trainers, and has also received capacity-building

yang disampaikan oleh pelatih eksternal berpengalaman, serta memperoleh pembekalan dari lembaga pembela HAM yang kompeten, yaitu Rumah Mediasi Indonesia.

Lebih lanjut, Merdeka juga berpartisipasi aktif dalam konsultasi pemangku kepentingan dalam proses pembuatan Peraturan Presiden tentang Pelaksanaan Penilaian Kepatuhan Pelaku Usaha pada Bisnis dan yang diselenggarakan oleh Kementerian HAM. Konsultasi publik ini melibatkan berbagai pemangku kepentingan, seperti pemerintah, asosiasi bisnis, perusahaan, dan LSM. Partisipasi Merdeka mencerminkan komitmen Merdeka untuk mendukung pengembangan standar Bisnis dan HAM di Indonesia.

support from a competent human rights organization, Rumah Mediasi Indonesia.

Furthermore, Merdeka actively participated in stakeholder consultations during the drafting process of the Presidential Regulation on the Implementation of Business Compliance Assessment in Business and Human Rights, organized by the Ministry of Human Rights. The public consultation involved various stakeholders, including government representatives, business associations, companies, and NGOs. Merdeka's participation reflects its commitment to supporting the development of Business and Human Rights standards in Indonesia.



▲ Merdeka conducted Voluntary Principles on Security and Human Rights (VPSHR) training, delivered by an external expert, Rumah Mediasi Indonesia.

Adopting Good Governance

Mengadopsi Tata Kelola yang Baik

Mengadopsi Tata Kelola yang Baik

Adopting Good Corporate Governance

2025 Performance

Regulatory Compliance

No instances of non-compliance with laws or regulations resulted in fines, sanctions, or penalties from law enforcement authorities or regulators, including the Financial Services Authority and the Indonesia Stock Exchange

Code of Conduct

All employees (100%) received a refresher on the Code of Conduct through periodic email communications

Responsible Supply Chain

- > A total of 249 employees completed the CMS training held at Tujuh Bukit Gold Mine, Wetar Copper Mine, Konawe Nickel Mine, AIM Plant, and the Pani Gold Mine
- > No contracts were terminated due to significant environmental and social impacts on contractor performance
- > Contractor Management System (CMS) compliance was conducted for 100% contractors during selection process and 93% of the main contractors at Merdeka's operational sites during their contract implementation

Risk Management

- > A total of 446 participants from subsidiaries and contractors have attended the risk management training
- > Risk and opportunity management committee regular meeting on extreme and high risks

2026 Target

Regulatory Compliance

Maintain zero instances of non-compliance with laws or regulations resulting in fines, sanctions, or penalties from regulatory or law enforcement authorities

Code of Conduct

Ensure 100% of new and existing employees receive the Code of Conduct training and communication

Responsible Supply Chain

- > Increase the number of participants in CMS training
- > Maintain zero contract terminations due to significant environmental and social impacts on contractor performance
- > Maintain CMS compliance evaluation for all primary contractors during their contract period

Risk Management

- > Increase participation in risk management training among subsidiaries and contractors throughout 2026
- > Risk and opportunity management committee regular meeting on extreme and high risks



Pendekatan Manajemen

Sejak awal berdirinya, Merdeka senantiasa mengedepankan penerapan prinsip Tata Kelola Perusahaan yang Baik (GCG) dan berkomitmen untuk terus memperkuat praktik tersebut di masa mendatang. Sebagai panduan dalam menjalankan kegiatan usaha, Merdeka telah menyusun dan mengimplementasikan Pedoman Tata Kelola Perusahaan yang Baik, mengacu pada peraturan perundang-undangan yang berlaku, antara lain Undang-Undang Nomor 40 Tahun 2007 tentang Perseroan Terbatas sebagaimana telah diubah dari waktu ke waktu, Undang-Undang Nomor 8 Tahun 1995 tentang Pasar Modal sebagaimana telah diubah dari waktu ke waktu, serta berbagai

Our Management Approach

Since its establishment, Merdeka has prioritized the implementation of Good Corporate Governance (GCG) principles and remains committed to strengthening these practices in the future. As guidance for conducting its business activities, Merdeka has developed and implemented a Good Corporate Governance Guideline that refers to applicable laws and regulations, including Law No. 40 of 2007 on Limited Liability Companies, as amended from time to time, Law No. 8 of 1995 on Capital Markets, as amended from time to time, and various regulations issued by the Financial Services Authority of the Republic of Indonesia (OJK) and other

peraturan yang diterbitkan oleh Otoritas Jasa Keuangan Republik Indonesia dan regulator terkait lainnya. Pedoman GCG berfungsi sebagai acuan dalam pengambilan keputusan strategis oleh Direksi, pelaksanaan fungsi pengawasan oleh Dewan Komisaris, serta tolak ukur objektif dalam mengevaluasi efektivitas penerapan GCG di seluruh entitas usaha.

Pedoman GCG Merdeka dibangun dalam tiga lapisan utama. Lapisan pertama mencakup pedoman umum, lapisan kedua mencakup berbagai piagam, kode etik, serta kebijakan manajemen. Adapun tingkat ketiga mencakup Prosedur Operasi Standar (SOP) yang menjadi panduan pelaksanaan di tingkat operasional.

Merdeka senantiasa menjunjung tinggi kepatuhan terhadap seluruh peraturan dan perundang-undangan yang berlaku. Sepanjang tahun 2025, tidak ditemukan adanya pelanggaran terhadap ketentuan hukum yang mengakibatkan denda, sanksi non-moneter, maupun bentuk sanksi hukum lainnya dari otoritas yang berwenang, termasuk Otoritas Jasa Keuangan dan Bursa Efek Indonesia. [2-27]

Struktur Tata Kelola [2-9]

Mengacu pada Undang-Undang Nomor 40 Tahun 2007 tentang Perseroan Terbatas beserta seluruh perubahannya, struktur tata kelola Merdeka terdiri atas tiga organ utama, yaitu Rapat Umum Pemegang Saham Tahunan (RUPST), Dewan Komisaris, dan Direksi. RUPS berperan sebagai pemegang kekuasaan tertinggi dalam perusahaan dengan kewenangan untuk menetapkan keputusan strategis. Dewan Komisaris menjalankan fungsi pengawasan terhadap kinerja Direksi serta memberikan arahan strategis guna memastikan pengelolaan perusahaan berjalan efektif dan sejalan dengan kepentingan para pemangku kepentingan. Sementara itu, Direksi bertanggung jawab atas pengelolaan operasional perusahaan sehari-hari serta pelaksanaan strategi bisnis secara menyeluruh.

Direksi didukung oleh beberapa komite, yaitu:

- > Komite Keberlanjutan
- > Komite Manajemen Risiko dan Peluang
- > Komite Kesehatan dan Keselamatan Kerja
- > Komite Peninjauan Tailing dan Dewan Peninjau Tailing Independen

Untuk memenuhi ketentuan hukum dan memperkuat praktik tata kelola perusahaan yang baik, Dewan Komisaris Merdeka mencakup Komisaris Independen serta didukung oleh Komite Audit dan Komite Nominasi dan Remunerasi. Direksi didukung oleh Sekretaris Perusahaan, Unit Audit Internal, serta sejumlah komite pendukung seperti Komite Keberlanjutan, Komite Manajemen Risiko dan Peluang, Komite K3, Komite Peninjauan Tailing, dan Dewan Peninjauan Tailing Independen.

relevant regulators. The GCG Guideline serves as a reference for strategic decision-making by the Board of Directors, the supervisory function of the Board of Commissioners, and as an objective benchmark for evaluating the effectiveness of GCG implementation across all business entities.

The Merdeka GCG Guideline is structured in three main layers. The first layer consists of the general GCG guideline, the second layer includes various charters, codes of conduct, and management policies, while the third layer comprises Standard Operating Procedures (SOPs) that guide operational implementation.

Merdeka upholds strict compliance with all applicable laws and regulations. Throughout 2025, no violations of legal provisions resulting in fines, non-monetary sanctions, or other legal penalties from authorities, including the Financial Services Authority (OJK) and the Indonesia Stock Exchange (IDX), were identified.

Governance Structure

In accordance with Law No. 40 of 2007 on Limited Liability Companies and its subsequent amendments, Merdeka's governance structure consists of three main organs: the Annual General Meeting of Shareholders (AGMS), the Board of Commissioners, and the Board of Directors. The GMS serves as the company's highest decision-making body with authority over strategic corporate decisions. The Board of Commissioners oversees the performance of the Board of Directors and provides strategic guidance to ensure the company is managed effectively and in alignment with the interests of all stakeholders. Meanwhile, the Board of Directors is fully responsible for the company's day-to-day management and the implementation of its business strategies.

Board of Directors is also supported by several committees, namely:

- > Sustainability Committee
- > Risk and Opportunity Management Committee
- > Occupational Health and Safety Committee
- > Tailings Review Committee and Independent Tailings Review Board

To ensure compliance with regulations and enhance good corporate governance practices, Merdeka's Board of Commissioners includes Independent Commissioners and is supported by the Audit Committee and the Nomination and Remuneration Committee. The Board of Directors is assisted by the Corporate Secretary, Internal Audit Unit, and several supporting committees, including the Sustainability Committee, Risk and Opportunity Management Committee, OHS Committee, Tailing Review Committee, and the Independent Tailing Review Board.

Dewan Komisaris Merdeka terdiri dari enam orang anggota, seluruhnya laki-laki. Masa jabatan Dewan Komisaris berlaku sejak tanggal pengangkatan oleh RUPST hingga penutupan RUPST kelima, tanpa mengurangi hak RUPST untuk memberhentikan anggota Dewan Komisaris sewaktu-waktu sesuai dengan Anggaran Dasar dan ketentuan peraturan perundang-undangan yang berlaku.

Direksi Merdeka berjumlah tujuh orang, dengan komposisi tujuh laki-laki dan satu perempuan. Masa jabatan Direksi dimulai sejak tanggal pengangkatan oleh RUPST hingga penutupan RUPS kelima, tanpa mengurangi hak RUPST untuk sewaktu-waktu memberhentikan anggota Direksi sesuai dengan Anggaran Dasar Perseroan dan peraturan perundang-undangan yang berlaku.

Komite Keberlanjutan

Direksi membentuk Komite Keberlanjutan untuk mendukung pengambilan keputusan dan mengawasi pengelolaan dampak perusahaan terhadap ekonomi, lingkungan, dan masyarakat. Selain itu, Komite Keberlanjutan bertanggung jawab membantu Dewan Komisaris dalam mengawasi implementasi komitmen dan kinerja keberlanjutan Merdeka. Dipimpin oleh Presiden Direktur, anggota Komite Keberlanjutan terdiri dari Presiden Direktur, Manajemen Eksekutif, General Manager, Kepala Teknik Tambang (KTT), General Manager kantor pusat, Manajer ESG dan Perubahan Iklim serta Manajer Departemen Keberlanjutan lainnya.

Komite Manajemen Risiko dan Peluang

Komite Manajemen Risiko dan Peluang dibentuk untuk membantu Direksi dalam mengawasi dan memantau manajemen risiko dan peluang di Merdeka. Tanggung jawabnya meliputi peninjauan berkala terhadap kebijakan, strategi, target, dan panduan manajemen risiko Merdeka. Komite ini juga meninjau risiko sosial, lingkungan (termasuk risiko perubahan iklim dan kelangkaan air), kesehatan dan keselamatan, serta risiko operasional. Selain itu, komite meninjau dan menyetujui tindakan mitigasi dan pengendalian untuk risiko ekstrem dan tinggi serta mengevaluasi efektivitas tindakan tersebut. Komite ini dipimpin oleh Presiden Direktur, dengan anggota yang terdiri dari Tim Eksekutif, General Manajer Risiko, Kepatuhan dan Sistem, General Manajer Operasional, Direktur Proyek, dan Manajer Risiko.

Komite Kesehatan dan Keselamatan Kerja

Komite Kesehatan dan Keselamatan Kerja (K3) dibentuk oleh Direksi untuk membantu dalam pengawasan implementasi dan realisasi komitmen kesehatan serta keselamatan kerja Merdeka. Tanggung jawab komite meliputi peninjauan kebijakan, strategi, target, dan panduan kesehatan serta keselamatan kerja secara berkala. Komite ini juga memantau kinerja kesehatan dan keselamatan kerja melalui forum dan laporan, menunjuk anggota kunci dalam Tim Manajemen Krisis

The Merdeka Board of Commissioners consists of six members, all of whom are male. The term of office of the Board of Commissioners runs from the date of appointment by the AGMS until the closing of the fifth subsequent AGMS, without prejudice to the authority of the AGMS to dismiss members of the Board of Commissioners at any time in accordance with the Company's Articles of Association and applicable laws and regulations.

The Merdeka Board of Directors consists of seven members, comprising seven men and one woman. The term of office of the Board of Directors begins from the date of appointment by the AGMS until the closing of the fifth subsequent AGMS, without prejudice to the authority of the GMS to dismiss members of the Board of Directors at any time in accordance with the Company's Articles of Association and applicable laws and regulations.

Sustainability Committee

The Board of Directors has established the Sustainability Committee to assist the Board in carrying out its oversight responsibilities on the development and implementation of Merdeka's sustainability commitment, strategy, roadmap, targets, and guidelines. Chaired by the President Director, the committee includes the President Director, Executive Management, Site General Managers, the Head of Technical Mining (KTT), the General Manager of the head office, ESG and Climate Change manager and other managers of Sustainability Division.

Risk and Opportunity Management Committee

The Risk and Opportunity Management Committee assists the Board of Directors in overseeing risk and opportunity management at Merdeka. It is responsible for reviewing risk management policies, strategies, targets, and guidelines. The committee also reviews social, environmental (including climate change and water scarcity risks), health and safety, and operational risks. The committee approves mitigation measures for extreme and high-risk scenarios and evaluates their effectiveness. The President Director chairs this committee, with members including the Executive Team, General Manager of Risk, Compliance, and System, General Manager of Operations, Project Director, and Risk Manager.

Health and Safety Committee

The Health and Safety Committee (OHS) was established by the Board of Directors to oversee the implementation of Merdeka's health and safety commitments. Its responsibilities include reviewing policies, strategies, targets, and guidelines periodically. The committee monitors health and safety performance through forums and reports, appoints key members of Merdeka's Crisis Management Team, and ensures that information regarding its functions and roles is

Merdeka, serta memastikan informasi terkait fungsi dan peran komite diformulasikan, ditinjau, dan disebarluaskan kepada seluruh karyawan. Komite ini dipimpin oleh Presiden Direktur, dengan anggota yang terdiri dari Tim Eksekutif, General Manajer Risiko, Kepatuhan dan Sistem, General Manajer Operasional, dan Manajer K3.

Komite Tinjauan Tailing

Komite Tinjauan Tailing dibentuk untuk membantu Direksi dalam mengawasi manajemen tailing di Merdeka. Komite ini bertanggung jawab menyampaikan informasi kepada Presiden Direktur tentang risiko tata kelola yang berkaitan dengan fasilitas tailing, serta menilai efektivitas rencana tindakan mitigasi risiko. Komite mengawasi implementasi tindakan terkait manajemen risiko tata kelola dan perbaikan berkelanjutan dalam pengelolaan fasilitas tailing. Selain itu, komite memastikan bahwa *Independent Tailings Review Board* (ITRB) menyelesaikan tinjauan tahunan mengenai desain, konstruksi, operasi, dan penutupan fasilitas tailing Merdeka.

Komite juga memberikan dukungan manajemen eksekutif serta sumber daya untuk tindakan yang diidentifikasi dari hasil tinjauan ITRB, serta memperbarui daftar risiko yang relevan untuk setiap unit bisnis secara tahunan. *Chief Operating Officer* bertindak sebagai Ketua Komite dengan anggota yang terdiri dari Chief Operating Officer, Site General Manager of Operations, Executive VP Sustainability, General Manajer Risiko, Kepatuhan dan Sistem, Principal Tailings, Tailing Storage Facility (TSF) Construction Manager, Processing Manager, dan Mining Manager.

Prosedur Nominasi Dewan Komisaris dan Direksi ^[2-10]

Pengangkatan dan pemberhentian anggota Dewan Komisaris dan Direksi dilakukan oleh RUPST. Komite Nominasi dan Remunerasi berperan penting dalam proses ini, dengan memberikan usulan kandidat yang memenuhi syarat kepada Dewan Komisaris untuk kemudian diajukan kepada RUPST. Komite ini juga membantu Dewan Komisaris dalam melakukan penilaian kinerja anggota Direksi dan/atau Dewan Komisaris berdasarkan tolok ukur yang telah disusun sebagai bahan evaluasi tahunan. Komite Nominasi dan Remunerasi dipimpin oleh Komisaris Independen.

Dalam merumuskan usulan nominasi, Komite mempertimbangkan berbagai kriteria, termasuk latar belakang pendidikan, pengalaman kerja, tingkat independensi, keberagaman gender, serta pemahaman terhadap isu-isu ekonomi, lingkungan, sosial, dan tata kelola.

Informasi detail dapat ditemukan di [Piagam Komite Nominasi dan Remunerasi](#) dan [Pedoman Tata Kelola Komunikasi Direksi dan Dewan Komisaris](#).

formulated, reviewed, and disseminated to all employees. Chaired by the President Director, the committee includes the Executive Team, General Manager of Risk, Compliance, and System, General Manager of Operations, and Health and Safety Managers.

Tailing Review Committee

The Tailing Review Committee was established to assist the Board of Directors in overseeing tailings management at Merdeka. The committee is responsible for reporting to the President Director on governance risks associated with tailings facilities and evaluating the effectiveness of risk mitigation strategies. It ensures the implementation of risk governance measures and continuous improvements in tailings facility management. Additionally, the committee oversees the Independent Tailings Review Board (ITRB), which conducts an annual review of the design, construction, operation, and closure of Merdeka's tailings facilities.

The committee also provides executive management with support and resources for actions identified in ITRB reviews and updates the relevant risk register for each business unit annually. The Chief Operating Officer serves as the committee chair, with members including the Chief Operating Officer, Site General Manager of Operations, Executive VP of Sustainability, General Manager of Risk, Compliance, and System, Principal Tailings, Tailing Storage Facility (TSF) Construction Manager, Processing Manager, and Mining Manager.

Nomination Procedures for the Board of Commissioners and Board of Directors

The appointment and dismissal of members of the Board of Commissioners and the Board of Directors are carried out by the AGMS. The Nomination and Remuneration Committee plays a key role in this process by proposing qualified candidates to the Board of Commissioners, who then submit the nominations to the AGMS. The Committee also assists the Board of Commissioners in evaluating the performance of members of the Board of Directors and/or Board of Commissioners based on established performance indicators used as part of the annual assessment process. The Nomination and Remuneration Committee is chaired by an Independent Commissioner.

In formulating its nomination proposals, the Committee takes into account various criteria, including educational background, professional experience, level of independence, gender diversity, as well as understanding of economic, environmental, social, and governance issues.

Detailed information can be found in the [Nomination and Remuneration Committee Charter](#) and [the Board of Directors and Board of Commissioners Communication Governance Guidelines](#).

Ketua Badan Tata Kelola Tertinggi dan Konflik Kepentingan [2-11] [2-15]

Hal ini sejalan dengan Undang-Undang Perseroan Terbatas No. 40 Tahun 2007 sebagaimana telah diubah dari waktu ke waktu, yang mengatur penerapan sistem dewan dua tingkat atau *two-tier board system* di Indonesia, yang terdiri atas Dewan Komisaris dan Direksi. Dewan Komisaris bertanggung jawab secara kolektif dalam mengawasi kinerja Direksi, memberikan arahan strategis, serta memastikan bahwa perusahaan beroperasi sesuai dengan prinsip-prinsip tata kelola yang baik guna mendukung pencapaian visi dan misi perusahaan. Sementara itu, Direksi bertanggung jawab atas pelaksanaan operasional perusahaan, dengan dukungan dari Sekretaris Perusahaan dan berbagai komite lainnya.

Struktur ini dirancang untuk memastikan efektivitas dan efisiensi operasional yang selaras dengan kepentingan para pemangku kepentingan, serta untuk menjamin bahwa Direksi dan Dewan Komisaris tidak terpengaruh oleh kepentingan pribadi atau pihak tertentu dan terbebas dari benturan kepentingan. Apabila terdapat potensi atau indikasi benturan kepentingan antara kepentingan Merdeka dan kepentingan pribadi anggota Dewan Komisaris atau Direksi yang dapat memengaruhi independensi dalam pengambilan keputusan perusahaan, maka hal tersebut wajib mendapatkan persetujuan dalam RUPST. Proses ini harus dilaksanakan dengan mengacu pada prinsip-prinsip Tata Kelola Perusahaan yang Baik, sebagai upaya untuk menjaga integritas serta kepercayaan publik terhadap perusahaan.

Selanjutnya, untuk menjaga profesionalisme dan objektivitas dalam menjalankan fungsi pengawasan dan pengelolaan perusahaan, anggota Dewan Komisaris dan Direksi dilarang merangkap jabatan yang dapat menimbulkan benturan kepentingan, baik secara langsung maupun tidak langsung. Selain itu, setiap anggota Dewan Komisaris dan Direksi wajib menunjukkan komitmen yang tinggi untuk menghindari segala bentuk benturan kepentingan, serta menjunjung tinggi etika bisnis dan integritas dalam setiap keputusan dan kebijakan yang diambil. Dalam sistem dewan dua tingkat atau *two-tier board system*, fungsi pengawasan dan pengelolaan dipisahkan secara jelas melalui Dewan Komisaris dan Direksi, sehingga keduanya didefinisikan sebagai badan tata kelola tertinggi. Pada tahun 2025, tidak terdapat kasus benturan kepentingan di seluruh wilayah operasional Merdeka.

Informasi detail mengenai tata kelola benturan kepentingan dapat ditemukan di [Merdeka Copper Gold - Documents](#).

Chair of the Highest Governance Body and Conflict of Interest

This is in line with the Indonesian Company Law No. 40 of 2007, as amended from time to time, which regulates the implementation of a two-tier board system in Indonesia, consisting of the Board of Commissioners and the Board of Directors. The Board of Commissioners is collectively responsible for supervising the performance of the Board of Directors, providing strategic direction, and ensuring that the company operates in accordance with good corporate governance principles to support the achievement of its vision and mission. Meanwhile, the Board of Directors is responsible for the company's operational execution, supported by the Corporate Secretary and various other committees.

This structure is designed to ensure operational effectiveness and efficiency that aligns with the interests of stakeholders, as well as to ensure that the Board of Directors and the Board of Commissioners are not influenced by personal or third-party interests and remain free from conflicts of interest. If there is a potential or indication of a conflict of interest between Merdeka's interests and the personal interests of any member of the Board of Commissioners or the Board of Directors that may affect independence in the company's decision-making, such matters must obtain approval at the General Meeting of Shareholders (AGMS). This process must be carried out with reference to the principles of Good Corporate Governance (GCG) as an effort to maintain the company's integrity and public trust.

Furthermore, to maintain professionalism and objectivity in carrying out the supervisory and management functions of the company, members of the Board of Commissioners and the Board of Directors are prohibited from holding concurrent positions that may create a conflict of interest, either directly or indirectly. In addition, each member of the Board of Commissioners and the Board of Directors is required to demonstrate a strong commitment to avoiding all forms of conflict of interest, as well as to uphold business ethics and integrity in every decision and policy made. In a two-tier board system, supervisory and management functions are clearly separated through the Board of Commissioners and the Board of Directors, both of which are defined as the highest governance bodies. In 2025, there were no cases of conflicts of interest across all Merdeka operational areas.

Detailed information concerning the governance of conflict of interest can be found at [Merdeka Copper Gold - Documents](#).

Rapat Dewan Komisaris dan Direksi [2-16]

Direksi mengadakan rapat rutin setiap bulan untuk membahas berbagai aspek strategis dan operasional perusahaan. Sementara itu, Dewan Komisaris mengadakan rapat setiap dua bulan untuk menjalankan fungsi pengawasan dan memberikan arahan strategis. Rapat gabungan antara Direksi dan Dewan Komisaris juga dilakukan setiap empat bulan sekali untuk membahas isu-isu penting, termasuk keberlanjutan, kepatuhan, risiko, serta kinerja perusahaan guna memastikan penerapan tata kelola yang konsisten.

Pelatihan Keberlanjutan bagi Badan Tata Kelola Tertinggi [E.2] [2-17]

Untuk secara efektif mengawasi dampak terkait keberlanjutan, Merdeka memastikan bahwa anggota Badan Tata Kelola Tertinggi terus meningkatkan pemahaman mereka terhadap isu-isu ekonomi, lingkungan, dan sosial yang relevan. Dengan menyadari meningkatnya kompleksitas operasional bisnis serta pentingnya pembangunan berkelanjutan, Perusahaan menugaskan anggota Komite Keberlanjutan dari Divisi Keberlanjutan untuk secara aktif mengikuti program pengembangan kapasitas yang berfokus pada topik ESG, termasuk pelaporan keberlanjutan, perubahan iklim, dan hak asasi manusia.

Pada tahun 2025, anggota Komite Keberlanjutan telah mengikuti berbagai pelatihan tentang ESG, termasuk pelatihan Manajer Energi oleh Konservasi Energi Solusi Indonesia, perhitungan cakupan 3 Gas Rumah Kaca (GRK) oleh Daun+, pelatihan Prinsip-Prinsip Sukarela mengenai Keamanan dan Hak Asasi Manusia (VPSHR) oleh Rumah Mediasi Indonesia, dan pelatihan Penilaian Daur Hidup.

Melalui berbagai inisiatif ini, Merdeka memastikan bahwa Badan Tata Kelola Tertinggi tetap memiliki pengetahuan yang memadai untuk menjalankan tanggung jawabnya dalam mengarahkan praktik bisnis berkelanjutan Perusahaan. Hasil pelatihan dan diskusi telah dibagikan kepada anggota Direksi yang juga menjabat sebagai anggota Komite Keberlanjutan melalui sesi alih pengetahuan yang diselenggarakan dalam rapat Komite Keberlanjutan.

Evaluasi Kinerja Dewan Komisaris dan Direksi [2-18][2-21]

Evaluasi kinerja Dewan Komisaris dan Direksi dilakukan setiap tahun dengan metode penilaian mandiri (*self-assessment*). Setiap anggota Dewan Komisaris dan Direksi mengevaluasi kinerjanya berdasarkan pencapaian target Indikator Kinerja Utama (KPI) yang telah disepakati pada awal tahun.

Kriteria evaluasi mencakup:

- » Kinerja Perseroan;
- » Budaya Kerja Direksi dan Dewan Komisaris;
- » Efektivitas fungsi pengawasan dan pengurusan;

Board of Commissioners and Board of Directors Meetings

The Board of Directors holds monthly meetings to discuss strategic and operational matters. The Board of Commissioners meets every two months to fulfill its supervisory duties and provide strategic guidance. Joint meetings between the Board of Directors and the Board of Commissioners occur every four months, covering sustainability, compliance, risk management, and company performance to ensure consistent governance practices.

Sustainability Training for the Highest Governance Body

To effectively oversee the Company's sustainability-related impacts, Merdeka ensures that members of the highest governance body continuously enhance their understanding of relevant economic, environmental, and social issues. Recognizing the increasing complexity of business operations and the importance of sustainability, the Company assigns members of the Sustainability Committee from the Sustainability Division to actively participate in capacity-building programs focused on ESG matters, including sustainability reporting, climate change, and human rights.

In 2025, members of the Sustainability Committee participated in various ESG-related trainings, including Energy Manager training by Konservasi Energi Solusi Indonesia, Scope 3 greenhouse gas (GHG) calculation training by Daun+, Voluntary Principles on Security and Human Rights (VPSHR) training by Rumah Mediasi Indonesia, and Life Cycle Assessment training.

Through these initiatives, Merdeka ensures that the Highest Governance Body maintains adequate knowledge to fulfill its responsibilities in directing the Company's sustainable business practices. Training outcomes and discussions were shared with members of the Board of Directors, who also serve on the Sustainability Committee, through knowledge transfer sessions conducted during Sustainability Committee meetings.

Performance Evaluation of the Board of Commissioners and Board of Directors

The performance evaluation of the Board of Commissioners and Board of Directors is conducted annually through a self-assessment process. Each Board of Commissioners and Board of Directors member assesses their performance based on Key Performance Indicator (KPI) targets set at the beginning of the year.

The evaluation criteria include:

- » Corporate performance;
- » The work culture of the Board of Directors and Board of Commissioners;

- » Penerapan tata kelola perusahaan yang baik (GCG);
- » Praktik operasional dan pertambangan yang bertanggung jawab; serta
- » Komitmen terhadap keberlanjutan, termasuk efektivitas pengelolaan dampak perusahaan terhadap aspek ekonomi, lingkungan, dan sosial.

- » Effectiveness of supervisory and management functions;
- » Implementation of good corporate governance (GCG);
- » Responsible operational and mining practices; and
- » Commitment to sustainability, including the effectiveness of managing the Company's impacts on economic, environmental, and social aspects.

Hasil evaluasi kinerja dan rasio kompensasi tahunan dapat ditemukan dalam [Laporan Tahunan Merdeka 2025](#).

The results of these evaluations and annual total compensation ratio are available in the [2025 Annual Report of Merdeka](#).

Kebijakan Penetapan Remunerasi [2-19][2-20]

Penentuan remunerasi bagi Direksi dan Dewan Komisaris di Merdeka menjadi kewenangan Dewan Komisaris, yang dilakukan melalui proses evaluasi yang mendalam dan transparan. Keputusan remunerasi merujuk pada Pasal 11 Peraturan Otoritas Jasa Keuangan No. 34/POJK.04/2014 tentang Komite Nominasi dan Remunerasi Emiten atau Perusahaan Publik.

Remuneration Policy

The determination of remuneration for the Board of Directors and Board of Commissioners at Merdeka is the responsibility of the Board of Commissioners, carried out through a comprehensive and transparent evaluation process. This decision is made in accordance with Article 11 of the Financial Services Authority Regulation No. 34/POJK.04/2014, which pertains to the Nomination and Remuneration Committee for Public Companies.

Keputusan jumlah remunerasi ditetapkan melalui Rapat Dewan Komisaris berdasarkan rekomendasi dari Komite Nominasi dan Remunerasi, yang memberikan saran terkait struktur, besaran, dan indikator penilaian remunerasi yang selaras dengan strategi perusahaan. Dalam proses ini, aspek ESG seperti manajemen lingkungan, kesehatan, dan keselamatan kerja menjadi bagian penting dalam penilaian untuk memastikan bahwa kebijakan remunerasi mendorong implementasi prinsip keberlanjutan secara holistik. Keputusan akhir mengenai remunerasi Direksi dan Dewan Komisaris membutuhkan persetujuan dalam RUPS, yang merupakan forum tertinggi dalam tata kelola perusahaan. Untuk memastikan independensi dan objektivitas dalam pelaksanaan tugasnya, Komite Nominasi dan Remunerasi di Merdeka terdiri dari tiga anggota, yaitu satu Komisaris Independen yang menjabat sebagai Ketua Komite, satu Komisaris, dan satu pihak eksternal. Komposisi ini mencerminkan komitmen Perseroan terhadap praktik tata kelola perusahaan yang baik dan inklusif.

Remuneration levels are determined during a Board of Commissioners meeting, based on recommendations from the Nomination and Remuneration Committee. The Committee advises on the structure, amount, and performance indicators that align with the company's corporate strategy. ESG considerations that include environmental management, occupational health and safety are key elements in ensuring that the remuneration policy supports the broader implementation of sustainability principles. The final decision on remuneration for both the Board of Directors and Board of Commissioners must be approved at the General Meeting of Shareholders, the company's highest governance forum. To ensure independence and objectivity in carrying out its duties, the Merdeka's Nomination and Remuneration Committee consists of three members: one Independent Commissioner who serves as Chairperson, one Commissioner, and one external party. This composition reflects the Company's commitment to good and inclusive corporate governance practices.

Informasi detail dapat ditemukan di [Piagam Komite Nominasi dan Remunerasi](#).

Detailed information can be found in the [Nomination and Remuneration Committee Charter](#).

Berdasarkan hasil Rapat Umum Pemegang Saham Tahunan (RUPST) pada 10 Juni 2025, struktur remunerasi bagi anggota Dewan Komisaris dan Direksi terdiri dari tiga komponen utama: gaji dan tunjangan serta fasilitas lain. Pada tahun 2025, total remunerasi yang telah dibayarkan kepada Dewan Komisaris dan Direksi mencapai 2.673.169 juta dolar Amerika Serikat, yang mencerminkan komitmen perusahaan untuk memberikan penghargaan yang kompetitif sesuai dengan tanggung jawab dan kontribusi mereka dalam mencapai tujuan strategis perusahaan. Rasio kompensasi total tahunan dapat dilihat di [Laporan Tahunan Merdeka 2025](#).

Following the Annual General Meeting of Shareholders (AGMS) on June 10, 2025, the remuneration structure for the member of the Board of Commissioners and Board of Directors consists of three main components: salary, allowances and other facilities. In 2025, the total remuneration paid to the Board of Commissioners and Board of Directors amounted to 2,673,169 million USD, reflecting the company's commitment to offering competitive rewards aligned with their responsibilities and contributions toward achieving strategic corporate goals. Annual total compensation ratio can be found in the [2025 Annual Report of Merdeka](#)

Besaran dan struktur remunerasi bagi Direksi dan Dewan Komisaris ditentukan berdasarkan sejumlah indikator, termasuk hasil kinerja, budaya kerja Direksi dan Dewan Komisaris, Best Practice Mining, Keberlanjutan termasuk tanggung jawab sosial perusahaan, pelestarian lingkungan, serta kesehatan dan keselamatan kerja (K3). Penilaian kinerja dilakukan dengan membandingkan capaian aktual dengan target strategis yang telah ditetapkan dalam rencana perusahaan untuk tahun 2025, memastikan bahwa remunerasi mencerminkan pencapaian yang sesuai dengan visi dan misi perusahaan. Selain itu, Komite Nominasi dan Remunerasi mengevaluasi penerapan budaya kerja yang positif, seperti disiplin, integritas, dan kolaborasi yang ditunjukkan oleh Dewan Komisaris dan Direksi sepanjang tahun tersebut.

The amount and structure of remuneration for the Board of Directors and the Board of Commissioners are determined based on several indicators, including performance outcomes, the work culture of the Board of Directors and Commissioners, mining best practices, sustainability including corporate social responsibility environmental conservation, as well as occupational health and safety (OHS). Performance is assessed by comparing actual achievements to the strategic targets set in the 2025 corporate plan, ensuring that remuneration reflects accomplishments in line with the company's vision and mission. Additionally, the Nomination and Remuneration Committee reviews the promotion of a positive work culture, including discipline, integrity, and collaboration demonstrated by the Board of Commissioners and Board of Directors throughout the year.

Perusahaan juga mengadopsi praktik terbaik dalam operasional pertambangan di bawah kepemimpinan Direksi dan pengawasan Dewan Komisaris, dengan memastikan kegiatan usaha dilakukan secara transparan, akuntabel, bertanggung jawab, mandiri, dan adil. Komitmen ini diperkuat dengan perhatian khusus pada tanggung jawab sosial perusahaan (CSR), pelestarian lingkungan, serta penerapan standar kesehatan dan keselamatan kerja yang ketat untuk memastikan keberlanjutan usaha sekaligus menciptakan dampak positif bagi masyarakat dan lingkungan sekitar.

The company upholds best practices in mining operations under the leadership of the Board of Directors and the oversight of the Board of Commissioners, ensuring that all business activities are conducted with transparency, accountability, responsibility, independence, and fairness. This commitment is further strengthened by a strong emphasis on corporate social responsibility (CSR), environmental conservation, and the enforcement of rigorous health and safety standards, ensuring business sustainability while fostering a positive impact on the community and the surrounding environment.

Sebagai bagian dari kebijakan penghargaan yang berorientasi pada kinerja jangka panjang, perusahaan tidak memberikan remunerasi lain kepada Dewan Komisaris dan Direksi, kecuali melalui program insentif jangka panjang. Program ini mencakup kepemilikan saham oleh Direksi dan/atau Dewan Komisaris, yang dirancang untuk mendorong keberlanjutan kinerja yang sejalan dengan kepentingan jangka panjang pemegang saham dan perusahaan.

To reinforce a long-term performance orientation, the company does not offer additional remuneration to the Board of Commissioners and Board of Directors, except through a long-term incentive program. This program includes share ownership for the Board of Directors and/or Board of Commissioners, which is designed to align their long-term performance with the interests of both shareholders and the company.

Etika Bisnis dan Integritas

Merdeka berkomitmen teguh untuk menjunjung tinggi etika bisnis dan transparansi. Prinsip-prinsip tata kelola yang baik menjadi pilar utama dalam membangun serta mempertahankan kepercayaan mitra bisnis, baik saat ini maupun di masa depan. Dengan menjunjung tinggi integritas, kami memastikan bahwa setiap aspek operasional dilakukan secara etis, sehingga dapat memperkuat kepercayaan para pemangku kepentingan dan membangun hubungan yang berkelanjutan.

Business Ethics and Integrity

Merdeka is deeply committed to maintaining business ethics and transparency. The principles of good governance form the foundation for building and sustaining trust with our business partners, both now and in the future. By prioritizing integrity, we ensure that all aspects of our operations are carried out ethically, thereby strengthening stakeholder confidence and promoting long-term, sustainable relationships.

Kriteria Penentuan Remunerasi Dewan Komisaris dan Direksi

Criteria for Determining the Remuneration of Board of Commissioners and Board of Directors



Pendekatan ini juga berkontribusi pada terciptanya lingkungan kerja yang etis dan berkelanjutan. Kami berkomitmen untuk menjalankan bisnis secara bertanggung jawab, sesuai dengan prinsip-prinsip Tata Kelola Perusahaan yang Baik, nilai-nilai perusahaan, dan praktik terbaik dalam etika bisnis.

Sebagai bagian dari komitmen ini, kami telah mengembangkan sistem dan pendekatan yang mendorong seluruh karyawan untuk mematuhi kebijakan dan prosedur perusahaan. Selain itu, kami menciptakan lingkungan kerja yang terbuka, di mana setiap individu merasa diberdayakan untuk menyampaikan kekhawatiran jika terdapat pelanggaran terhadap nilai dan standar etika yang telah ditetapkan.

Kode Etik [205-2][14.22.3]

Kode Etik Merdeka menjadi pedoman bagi seluruh karyawan dalam menjalankan tugas sehari-hari, sejalan dengan komitmen kami untuk menerapkan etika bisnis dan menjalankan operasi secara bertanggung jawab. Kode Etik ini merupakan pernyataan tertulis mengenai komitmen Merdeka dalam menjalankan bisnis secara etis, memberikan panduan yang jelas bagi seluruh personel dalam berinteraksi dengan pemangku kepentingan, serta menjadi dasar dalam pengambilan keputusan yang berintegritas.

Kode Etik Merdeka berlaku bagi seluruh karyawan dan kontraktor, termasuk penyedia jasa keamanan pihak ketiga di seluruh operasional Merdeka. Kepatuhan terhadap Kode Etik tersebut dipastikan melalui persyaratan onboarding kontraktor, evaluasi kinerja kontraktor secara tahunan, serta tindak lanjut atas laporan ketidakpatuhan terhadap Kode Etik yang disampaikan melalui WBS Perusahaan.

Kode Etik ini mencakup berbagai aspek penting dalam operasional kami, di antaranya:

- > Karyawan – Menjaga keselamatan dan kesehatan kerja, menciptakan lingkungan kerja yang inklusif, serta menerapkan prinsip kesetaraan dan penghargaan terhadap setiap individu.
- > Masyarakat dan Lingkungan – Menghormati hak asasi manusia, mendukung pengembangan masyarakat, dan berkomitmen menjaga kelestarian lingkungan dalam setiap aktivitas perusahaan.
- > Hubungan dengan Pihak Lain – Membangun hubungan yang kuat, saling menguntungkan, dan berkelanjutan dengan seluruh pemangku kepentingan.

Untuk menerapkan Kode Etik secara efektif, kami memastikan bahwa seluruh karyawan baru maupun yang sudah ada memahami dengan baik ekspektasi yang tercantum dalam Kode Etik, proses pelaporan dugaan pelanggaran, serta prosedur yang akan dilakukan setelah pelanggaran dilaporkan. Di Merdeka, seluruh direktur, karyawan tetap dan tidak tetap, serta kontraktor diwajibkan untuk mengikuti pelatihan Kode Etik secara berkala.

This approach also plays a key role in cultivating an ethical and sustainable work environment. We are dedicated to conducting business responsibly, in alignment with the principles of Good Corporate Governance, the company's values, and best practices in business ethics.

As part of this commitment, we have implemented systems and strategies that encourage all employees to adhere to company policies and procedures. We also promote an open work environment where individuals feel empowered to report concerns regarding violations of established ethical standards and values.

Code of Conduct

Merdeka's Code of Conduct serves as a guide for all employees in carrying out their daily responsibilities, aligning with our commitment to ethical business practices and responsible operations. The Code provides clear direction for interacting with stakeholders and forms the basis for integrity-driven decision-making.

The Merdeka Code of Conduct applies to all employees and contractors, including third-party security service providers across Merdeka's operations. Compliance with the Code of Conduct is ensured through contractor onboarding requirements, annual contractor performance evaluations, and follow-up on reported non-compliance with the Code of Conduct submitted through the Company's Whistleblowing System (WBS).

The Code of Conduct addresses key operational areas, including:

- > Employees: Ensuring workplace safety and health, promoting an inclusive environment, and upholding equality and respect for all individuals.
- > Community and Environment: Respecting human rights, supporting community development, and committing to environmental preservation in all company activities.
- > External Relations: Building strong, mutually beneficial, and sustainable relationships with all stakeholders.

To implement the Code of Conduct effectively, we ensure that both new and existing employees are well-informed about the expectations outlined in the Code, the process for reporting potential violations, and the procedures that follow a reported breach. At Merdeka, all directors, permanent and temporary employees, as well as contractors, are required to complete regular training on the Code of Conduct (Code of Ethics).

Untuk menerapkan Kode Etik secara efektif, kami memastikan bahwa seluruh karyawan baru maupun yang sudah ada memahami dengan baik ekspektasi yang tercantum dalam Kode Etik, proses pelaporan dugaan pelanggaran, serta prosedur yang akan dilakukan setelah pelanggaran dilaporkan. Seluruh direktur, karyawan tetap dan tidak tetap, serta kontraktor diwajibkan untuk mengikuti pelatihan Kode Etik secara berkala. Pada tahun 2025, kami memberikan pelatihan Kode Etik kepada 9.557 individu. Materi pelatihan dan komunikasi Kode Etik mencakup sosialisasi nilai-nilai GREAtnESs, serta berbagai kebijakan terkait, seperti Kebijakan Keanekaragaman dan Inklusivitas, Kebijakan Anti-Korupsi dan Anti-Penyuapan, Kebijakan Anti-Pencucian Uang dan Konflik Kepentingan, Kebijakan Anti-Diskriminasi dan Kesetaraan Gender, dan Kebijakan Hak Asasi Manusia.

Anti-Korupsi dan Penyuapan [205-1][14.22.1][14.22.2]

Merdeka berkomitmen untuk menjalankan seluruh kegiatan bisnis secara profesional, adil, dan bermartabat. Komitmen Merdeka terhadap anti-korupsi dan anti-penyuapan dinyatakan dalam Kebijakan Anti Korupsi dan Kebijakan Anti Penyuapan Merdeka. Kami menyadari bahwa korupsi dan suap tidak hanya meningkatkan risiko finansial, tetapi juga berpotensi merusak reputasi perusahaan. Meskipun belum melakukan penilaian risiko korupsi di seluruh operasi, Merdeka secara proaktif mengidentifikasi dan mengatasi potensi praktik korupsi di seluruh area operasional kami. Penilaian risiko korupsi akan dilakukan untuk tahun pelaporan berikutnya. [205-1]

Untuk mengintegrasikan komitmen Merdeka terhadap anti-korupsi dan penyuapan, perusahaan secara rutin mengkomunikasikan Kebijakan Anti-Korupsi dan Kebijakan Anti-Penyuapan Merdeka kepada semua karyawan melalui komunikasi email. Selain itu, Merdeka memberikan pelatihan tentang anti-korupsi dan penyuapan kepada karyawan dan kontraktor sebagai bagian dari pelatihan Kode Etik.

Departemen Sumber Daya Manusia bertanggung jawab untuk melaksanakan kebijakan dan program antikorupsi dan suap. Implementasi kebijakan dan program anti-korupsi dan suap dipantau oleh Direktur Utama dan Direktur Sumber Daya Manusia. Direksi mengawasi implementasi Kebijakan, yang mencakup evaluasi laporan kinerja tentang implementasi Kebijakan yang diterima dari Direktur Utama dan Direktur Sumber Daya Manusia secara berkala

To ensure effective implementation, Merdeka ensures that both new and existing employees understand the expectations set out in the Code of Conduct, the procedures for reporting alleged violations, and the follow-up process. All directors, permanent and non-permanent employees, and contractors are required to participate in periodic Code of Conduct training. In 2025, Code of Conduct training was delivered to a total of 9,557 individuals. The Code of Conduct training and communication materials covers our GREAtnESs values and various related policies, such as the Diversity and Inclusion Policy, Anti-Corruption and Anti-Bribery Policy, Anti-Money Laundering and Conflict of Interest Policy, Anti-Discrimination and Gender Equality Policy, and Human Rights Policy.

Anti-Corruption and Bribery

Merdeka is committed to conducting all business activities with professionalism, fairness, and integrity. Our commitment to anti-corruption and anti-bribery is stated in Merdeka's Anti Corruption Policy and Anti Bribery Policy. We recognize that corruption and bribery not only increase financial risks but can also damage the company's reputation. Although a comprehensive corruption risk assessment has not yet been conducted across all operations, Merdeka proactively identifies and addresses potential corruption practices throughout its operational areas. A corruption risk assessment will be conducted in the next reporting year.

To integrate Merdeka's commitment to anti-corruption and anti-bribery, the Company regularly communicates its Anti-Corruption and Anti-Bribery Policies to all employees via email communications. In addition, Merdeka provides anti-corruption and anti-bribery training to employees and contractors as part of its Code of Conduct (Code of Ethics) training.

The Human Resources Department (HR Department) is responsible for implementing the anti-corruption and bribery policy and program. The implementation of the anti-corruption and bribery policy and program is monitored by the President Director and the Human Resources Director (HR Director). The Board of Directors oversees the implementation of the Policy, which includes evaluating performance reports on the implementation of the Policy received from the President Director and HR Director periodically.



▲ Posters promoting anti-corruption and anti-money laundering policy sent to Merdeka group and contractors

Sepanjang tahun 2025, tidak ditemukan kasus korupsi terbukti di seluruh wilayah operasional Merdeka. Hal ini mencerminkan efektivitas langkah-langkah pencegahan yang telah diterapkan. [205-3]

Merdeka menerapkan kebijakan tanpa toleransi terhadap segala bentuk korupsi, termasuk penyuapan. Setiap pelanggaran akan dikenakan sanksi tegas sesuai dengan kebijakan perusahaan. Komitmen ini tertuang secara jelas dalam Kode Etik, Kebijakan Anti-Korupsi, dan Kebijakan Anti-Penyuapan.

Pelatihan Kode Etik dan Anti-Korupsi Berdasarkan Level Tahun 2025 [205-2] [14.22.3]
Code of Conduct and Anti-Corruption Training by Level in 2025

Level	Komunikasi Kebijakan Anti-Korupsi Anti-Corruption Policy Communication		Pelatihan Kode Etik Pada Aspek Anti-Korupsi Code of Conduct Training on Anti-Corruption Aspects	
	Total	%	Total	%
Senior Management	111	100	111	100
Manager	162	100	162	100
Superintendent	399	100	399	100
Supervisor	1,191	100	1,191	100
Staff	2,097	100	2,097	100
Non-Staff	5,597	100	5,597	100
Total	9,557	100	9,557	100
Contractors	25,318	100	25,318	100

Pencegahan Pencucian Uang

Merdeka berkomitmen untuk mencegah praktik pencucian uang dalam seluruh kegiatan bisnisnya. Komitmen ini tercantum dalam Kode Etik dan Kebijakan Anti-Pencucian Uang Merdeka. Kami telah menetapkan prosedur ketat untuk memastikan bahwa keuangan perusahaan hanya digunakan untuk tujuan yang sah dan tidak disalahgunakan untuk aktivitas ilegal, seperti pencucian uang, pendanaan terorisme, atau tindakan kriminal lainnya. Komitmen ini tercermin dalam Kode Etik dan Kebijakan Anti-Pencucian Uang.

Mekanisme Penyampaian Keluhan

Untuk memastikan komunikasi yang efektif dalam menangani keluhan terkait dampak operasional perusahaan, kami telah mengembangkan Whistleblowing System (WBS). WBS memungkinkan pemangku kepentingan internal dan eksternal untuk melaporkan pelanggaran hukum maupun prosedur internal perusahaan, termasuk Kode Etik, Kebijakan Anti-Korupsi dan Anti-Penyuapan, Kebijakan Anti-Pencucian Uang, Kebijakan Kesehatan dan Keselamatan Kerja, Kebijakan Hak Asasi Manusia, dan peraturan lainnya.

WBS juga berfungsi sebagai mekanisme resmi bagi karyawan untuk memberikan umpan balik serta mengajukan pertanyaan kepada manajemen. Untuk menjaga kerahasiaan dan keamanan pelapor, WBS dirancang berdasarkan prinsip anonimitas untuk melindungi identitas pelapor, kerahasiaan untuk menjaga isi laporan dari akses tidak sah, dan perlindungan untuk mencegah

Throughout 2025, no confirmed corruption cases were found in any of Merdeka's operational areas, reflecting the effectiveness of our preventive measures.

Merdeka enforces a zero-tolerance policy toward all forms of corruption, including bribery. Any violations will result in strict sanctions in accordance with company policies. This commitment is explicitly outlined in the Code of Conduct, Anti-Corruption Policy, and Anti-Bribery Policy.

Anti-Money Laundering Prevention

Merdeka is committed to preventing money laundering across all its business activities. This commitment is embedded in our Code of Conduct and Anti-Money Laundering Policy. In line with this commitment, we have implemented strict procedures to ensure that company finances are used solely for legitimate purposes and are not misused for illegal activities such as money laundering, terrorism financing, or other criminal offenses.

Grievance Mechanism

To ensure effective communication in addressing complaints related to our operational impacts, we have developed a Whistleblowing System (WBS). This system allows both internal and external stakeholders to report any violations of the law or company policies, including the Code of Conduct, Anti-Corruption and Anti-Bribery Policy, Anti-Money Laundering Policy, Occupational Health and Safety Policy, Human Rights Policy, and other regulations.

The WBS also serves as a formal channel for employees to provide feedback and raise concerns with management. Designed with strict confidentiality measures, the system is built on three key principles; anonymity – protecting the identity of whistleblowers; confidentiality – ensuring reports remain secure and accessible only to authorized parties;

tindakan balasan terhadap pelapor. Laporan dapat disampaikan melalui platform Speak Up di <https://Merdeka.whispli.com/SpeakUp>, yang dikelola oleh konsultan independen. Alternatif lainnya, pelapor dapat mengajukan keluhan melalui telepon atau WhatsApp di 0812 5000 1018. [2-26][14.10.4]

Pada tahun 2025, jumlah laporan yang diterima dan ditindaklanjuti melalui sistem WBS Merdeka adalah sebagai berikut: [205-3][14.22.4]

Pengaduan Complaint	Jumlah Kasus Number of Cases	Status Pengaduan Complaint Status
Kesehatan dan Keselamatan Kerja Workplace Health and Safety	6	Selesai Closed
Pencurian, Peggelapan, Penipuan, dan Perilaku Tidak Etis Theft, Embezzlement, fraud, and Unethical Behaviour	55	Selesai Closed
Pelanggaran terhadap Hukum atau Peraturan yang Berlaku Violations on any applicable laws or regulations	25	Selesai Closed
Other Lainnya	6	Selesai Closed

Perusahaan menindaklanjuti seluruh pengaduan melalui sistem whistleblowing dengan melakukan verifikasi dan investigasi atas kasus terkait kesehatan dan keselamatan kerja, perilaku tidak etis, serta pelanggaran hukum, yang kemudian ditindaklanjuti melalui sanksi, perbaikan pengendalian internal, dan upaya pencegahan.

Konsultan independen yang mengelola sistem WBS akan mengonfirmasi penerimaan laporan, melakukan penilaian awal, dan meneruskan laporan tersebut kepada salah satu anggota Direksi. Direktur yang menerima laporan bertanggung jawab untuk menindaklanjuti keluhan sesuai dengan prosedur yang berlaku. [2-25]

Rantai Pasokan yang Bertanggung Jawab

Merdeka berkomitmen untuk menerapkan prinsip-prinsip Tata Kelola Perusahaan yang Baik di seluruh rantai pasokan. Untuk mewujudkan komitmen ini, Merdeka telah menetapkan Kode Etik Keberlanjutan Pemasok, yang mengatur prinsip, nilai, standar perilaku, prosedur pengambilan keputusan, serta sistem operasional. Kode Etik ini wajib dipatuhi oleh seluruh pemasok Merdeka, termasuk entitas anak, organisasi, maupun individu yang menyediakan barang atau jasa.

Dalam Kode Etik ini, pemasok diwajibkan untuk menjunjung tinggi etika dan integritas bisnis, yang mencakup larangan terhadap penyuapan, korupsi, pemberian *facilitation payment*, serta praktik bisnis terlarang lainnya. Pemasok juga harus mematuhi peraturan anti-korupsi dan anti-pencucian uang, mencegah konflik kepentingan, menjaga kerahasiaan informasi perusahaan, dan mematuhi regulasi privasi dan perlindungan data pribadi.

protection – preventing retaliation against whistleblowers. Reports can be submitted through the Speak Up platform at <https://Merdeka.whispli.com/SpeakUp>, which is managed by an independent consultant. Alternatively, whistleblowers can file complaints via phone or WhatsApp at 0812 5000 1018.

In 2025, the number of reports received and processed through Merdeka's WBS system is as follows:

The Company follows up on all complaints submitted through the whistleblowing system by conducting verification and investigation of cases related to occupational health and safety, unethical behavior, and legal violations, which are subsequently addressed through sanctions, improvements in internal controls, and preventive measures.

The independent consultant managing the WBS system will confirm receipt of each report, conduct an initial assessment, and forward it to a designated Director. The Director receiving the report is responsible for addressing the complaint in accordance with applicable procedures.

Responsible Supply Chain

Merdeka is committed to upholding Good Corporate Governance principles throughout its supply chain. To reinforce this commitment, we have established a Supplier Sustainability Code of Conduct, which defines our principles, values, ethical standards, decision-making procedures, and operational frameworks. Compliance with this Code is mandatory for all Merdeka suppliers, including businesses, organizations, and individuals providing goods or services.

Under the Supplier Sustainability Code of Conduct, suppliers are expected to uphold business ethics and integrity which include prohibitions against bribery, corruption, facilitation payments, and other illegal business practices. Suppliers must also comply with anti-corruption and anti-money laundering regulations, prevent conflicts of interest, maintain the confidentiality of company information, and adhere to privacy and personal data protection regulations.

Selain itu, Kode Etik Keberlanjutan Pemasok menekankan pentingnya:

- » **Kesehatan dan keselamatan kerja:** Pemasok wajib menerapkan standar yang memadai untuk melindungi pekerja dan lingkungan kerja.
- » **Perlindungan lingkungan:** Pemasok diharuskan meminimalkan dampak negatif operasional terhadap lingkungan dan mematuhi regulasi yang berlaku. Ini mencakup identifikasi peluang dan pelaksanaan program untuk mengurangi konsumsi air, limbah B3 dan non-B3, serta konsumsi energi dan emisi gas rumah kaca.
- » **Standar ketenagakerjaan yang adil,** termasuk kepatuhan terhadap:
 - » Upah minimum, jam kerja maksimum, dan periode istirahat.
 - » Hak cuti berbayar.
 - » Larangan kerja paksa dan pekerja anak.
 - » Menegakkan hak-hak pekerja untuk kebebasan berekspresi berkumpul secara damai, dan berserikat
 - » Menerapkan kebijakan anti diskriminasi dan memperlakukan karyawan mereka dengan setara tanpa memandang agama, ras, identitas gender, dan orientasi seksual.
- » **Hak asasi manusia:** Pemasok wajib menghormati hak asasi manusia dalam seluruh operasinya dan menjaga hubungan baik dengan masyarakat sekitar, serta berkontribusi pada pembangunan ekonomi dan sosial.

Implementasi Kode Etik Keberlanjutan Pemasok diintegrasikan ke dalam Sistem Manajemen Kontraktor (CMS) Merdeka, yang mencakup proses pemilihan, evaluasi, keterlibatan, dan pengelolaan kontraktor. Klausul kontrak dengan pemasok juga memuat persyaratan kepatuhan terhadap Kode Etik ini. Kode Etik Keberlanjutan Merdeka dapat diakses pada: [Merdeka Copper Gold - Documents](#).

Melalui penerapan Kode Etik Keberlanjutan Pemasok, Merdeka berupaya meminimalkan risiko GCG dalam rantai pasokan, mendorong praktik bisnis yang bertanggung jawab dan berkelanjutan, serta meningkatkan dampak positif terhadap ekonomi, sosial, dan lingkungan.

Pada tahun 2025, sosialisasi CMS dilakukan di Tambang Emas Tujuh Bukit, Tambang Tembaga Wetar, Tambang Nikel Konawe, Pabrik MTI, dan Tambang Emas Pani dengan jumlah peserta sebanyak 249 orang, yang terdiri dari risk champions sites, manajer K3 sites, Pemilik Kontrak, Penanggung Jawab Operasional Kontraktor, perwakilan K3 Kontraktor, dan personel supply chain sites untuk meningkatkan kinerja kontraktor.

Additionally, the Supplier Sustainability Code of Conduct emphasizes the importance of:

- » **Occupational Health & Safety:** Suppliers must maintain adequate health and safety standards to protect their workers and the work environment.
- » **Environmental Responsibility:** Suppliers are expected to minimize environmental impact and comply with all relevant environmental regulations. This includes the identification of opportunities and implementation of programs to reduce water consumption and toxic and non-toxic waste and the identification of opportunities for the reduction of energy consumption and greenhouse gas emissions.
- » **Fair Labor Standards,** including compliance with:
 - » Minimum wage, maximum working hours, and rest periods
 - » Paid leave entitlements
 - » Prohibition of forced labor and child labor
 - » Upholding workers' rights to freedom of expression, peaceful assembly, and association.
 - » Implementing anti-discrimination policies and treating their employees equally regardless of religion, race, gender identity, and sexual orientation.
- » **Human Rights Commitment:** Suppliers must respect human rights across their operations, maintain positive relationships with local communities, and contribute to economic and social development.

The implementation of the Supplier Sustainability Code of Conduct is integrated into Merdeka's Contractor Management System (CMS), which governs the selection, evaluation, engagement, and management of contractors. Contract agreements with suppliers also include mandatory compliance with this Code of Conduct. Merdeka Sustainability Code of Conduct can accessed through website: [Merdeka Copper Gold - Documents](#).

By enforcing the Supplier Sustainability Code of Conduct, Merdeka aims to mitigate governance risks within its supply chain, promote responsible and sustainable business practices, and enhance positive economic, social, and environmental impacts.

In 2025, CMS socialization was conducted across the Tujuh Bukit Gold Mine, Wetar Copper Mine, Konawe Nickel Mine, MTI Plant, and Pani Gold Mine, engaging a total of 249 participants. Attendees included site risk champions, site HSE managers, contract owners, contractor operational supervisors, contractor HSE representatives, and site supply chain personnel to improve contractors' performance.

Pemilihan dan Pemantauan Kontraktor

Merdeka menerapkan pendekatan yang komprehensif dalam proses pemilihan dan pemantauan kontraktor, dengan mempertimbangkan aspek komersial dan teknis. Aspek teknis mencakup indikator Sistem Manajemen Kontraktor (CMS), yang meliputi:

- » Sistem manajemen Kesehatan, Keselamatan, dan Lingkungan (K3L).
- » Rencana manajemen K3L dan rencana manajemen sumber daya manusia.
- » Dokumentasi ESG, termasuk Kode Etik Keberlanjutan Pemasok.
- » Pemeriksaan kesehatan dan asuransi kesehatan.
- » Prosedur tanggap darurat dan investigasi insiden.
- » Daftar persyaratan hukum dan regulasi terkait lainnya.

Setelah kontraktor terpilih, kepatuhan mereka terhadap indikator CMS dipantau secara berkala oleh tim CMS Merdeka. Pada tahun 2025, seleksi calon pemasok dilakukan dengan mempertimbangkan indikator K3, lingkungan, dan sosial sebagai bagian dari proses pemilihan kontraktor.

Kinerja kontraktor dievaluasi minimal sekali dalam setahun. Merdeka terus berupaya meningkatkan seleksi kontraktor dengan menerapkan kriteria K3. Pada tahun 2025, Merdeka menyeleksi 51 kontraktor utama menggunakan kriteria K3 dalam proses seleksi serta mengevaluasi kinerja K3 dari 93% kontraktor utama selama pelaksanaan kontrak dilapangan. Evaluasi ini mencakup:

- » Aspek K3L.
- » Ketentuan ketenagakerjaan.
- » Kegiatan sosial.
- » Kepatuhan terhadap kebijakan anti-korupsi dan anti-suap.

Kontraktor diwajibkan menindaklanjuti setiap ketidaksesuaian yang ditemukan dalam hasil evaluasi CMS. Kegagalan dalam menindaklanjuti temuan dapat berujung pada pemutusan kontrak. Sepanjang tahun 2025, tidak terdapat pemutusan kontrak akibat dampak lingkungan dan sosial yang signifikan terhadap kinerja kontraktor. [308-1][308-2][414-1][414-2][14.17.9][14.17.10][14.18.3][14.19.3]

Manajemen Risiko dan Peluang ^[E.3]

Karakteristik bisnis Merdeka menuntut pendekatan proaktif dan waspada dalam mengelola risiko dan peluang. Kami berkomitmen untuk mengidentifikasi risiko dan peluang secara dini, tidak hanya untuk melindungi operasi, tetapi juga untuk menangkap peluang baru yang dapat membangun ketahanan bisnis dan menciptakan nilai jangka panjang dalam industri tambang yang terintegrasi dan dinamis.

Seiring dengan ekspansi bisnis menuju rantai nilai yang terintegrasi, setiap tahapan dalam rantai nilai tersebut menghadirkan beragam risiko yang perlu dipantau. Untuk memastikan kesinambungan bisnis dan operasional, kami telah menyusun rencana mitigasi komprehensif guna mengurangi risiko serta memaksimalkan peluang.

Contractor Selection and Monitoring

Merdeka employs a comprehensive approach to contractor selection and monitoring, considering both commercial and technical aspects. The technical evaluation is based on indicators from the Contractor Management System (CMS), which include:

- » Health, Safety, and Environment management system
- » Health, Safety, and Environment and human resource management plans
- » ESG documentation, including the Supplier Sustainability Code of Conduct
- » Health examinations and insurance coverage
- » Emergency response procedures and incident investigations
- » Compliance with legal and regulatory requirements

Once contractors are selected, their compliance with CMS indicators is regularly monitored by Merdeka's CMS team. In 2025, health, safety and environmental, and social indicators were incorporated into the contractor selection process.

Contractor performance is evaluated at least once a year. Merdeka continues to strengthen contractor selection by applying occupational health and safety (OHS) criteria. In 2025, Merdeka screened 51 main contractors using OHS criteria during the selection process and evaluated the OHS performance of 93% of main contractors during contract implementation in the field. This evaluation covered:

- » Health, Safety, and Environment performance
- » Labor compliance
- » Social responsibility initiatives
- » Adherence to anti-corruption and anti-bribery policies

Contractors are required to address any non-compliance issues identified during the CMS evaluation. Failure to comply may result in contract termination. However, throughout 2025, no contracts were terminated due to significant environmental or social impacts.

Risk and Opportunity Management

The nature of Merdeka's business requires a proactive and vigilant approach to managing risks and opportunities. We are committed to early identification of risks and opportunities, not only to safeguard operations but also to seize new opportunities that enhance business resilience and create long-term value in the integrated and dynamic mining industry.

As Merdeka expands into an integrated value chain, each stage presents unique risks that require continuous monitoring. To safeguard business continuity, we have implemented a comprehensive mitigation plan aimed at minimizing risks and maximizing opportunities.

Dalam upaya mengelola risiko dan melindungi pencapaian tujuan strategis, reputasi, serta keberlanjutan bisnis, Merdeka telah menetapkan Kebijakan dan Standar Manajemen Risiko dan Peluang. Manajemen risiko diterapkan secara berjenjang, dengan penilaian risiko yang dilakukan pada tiga tingkat, yaitu risiko tinggi, risiko menengah, dan risiko rendah.

Penilaian risiko tingkat tinggi mencakup risiko di tingkat perusahaan, unit bisnis, dan lokasi operasional. Penilaian ini dilakukan oleh Komite Manajemen Risiko dan tim manajemen di setiap lokasi atau proyek. Komite ini beranggotakan Direktur Perusahaan, Direktur Proyek, Eksekutif, General Manajer site, General Manajer Risiko, Kepatuhan, dan Sistem, serta Manajer Risiko.

Komite ini mengadakan pertemuan setiap bulan untuk membahas pembaruan profil risiko ekstrem dan tinggi dari seluruh site serta mengevaluasi efektivitas kontrol mitigasi terhadap risiko-risiko tersebut. Seluruh site bertanggung jawab untuk memperbarui status risiko ekstrem dan tinggi, termasuk pengendalian mitigasi tiap minggunya. Selain itu, mereka juga diwajibkan untuk melakukan identifikasi risiko dan mitigasi secara berkelanjutan, serta melaporkan status semua risiko (termasuk risiko rendah dan menengah) ke kantor pusat setiap bulan.

Jenis risiko dan peluang yang dinilai oleh site dan Komite Manajemen Risiko mencakup risiko geoteknik, kesehatan dan keselamatan, lingkungan, kerusakan properti, kerusakan sosial, regulasi, gangguan bisnis, penundaan, anggaran biaya berlebih, desain proyek, operasional, pengembangan sumber daya, metalurgi, eksekutif, reputasi, keuangan, ekonomi, perubahan iklim, dan risiko kelangkaan air.

Penilaian risiko tingkat menengah menangani risiko yang terkait dengan departemen unit bisnis dan proyek ad-hoc. Penilaian ini mencakup *Baseline Risk and Opportunity Assessment (BROA)*, *Hazard Identification*, *Risk Assessment*, and *Determination of Control (HIRADC)*, *Environmental Aspect and Impact Assessment*, *Hazard Operability (HAZOP)*, dan *Management of Change (MoC)*.

Penilaian risiko tingkat rendah dilakukan oleh kelompok kerja kecil dan individu yang mencakup analisis keselamatan kerja lingkungan, penilaian sebelum pelaksanaan pekerjaan, dan observasi manajemen risiko kritis. Pendekatan Manajemen Risiko dan Peluang Grup Merdeka selaras dengan prinsip dan pedoman Manajemen Risiko ISO 31000:2018, Sistem Manajemen Kesehatan dan Keselamatan Kerja ISO 45001:2018, dan Sistem Manajemen Lingkungan ISO 14001:2015 untuk memperkuat komitmen perusahaan terhadap praktik terbaik dalam tata kelola risiko.

To manage risks effectively while protecting our strategic objectives, reputation, and sustainability, Merdeka has established a Risk and Opportunity Management Policy and Standard. Risk management is categorized into three levels: High risk, Medium risk, and Low risk.

High-level risk assessments at Merdeka encompass risks at the corporate, business unit, and operational site levels. These assessments are conducted by the Risk Management Committee and site management teams, ensuring a structured approach to risk identification and mitigation. The committee consists of key leadership, including the Company Director, Project Director, Executives, Site General Managers, Risk, Compliance & System General Manager, and Risk Managers.

To maintain proactive risk oversight, the committee meets monthly to review updates on extreme and high-risk profiles across all sites and assess the effectiveness of mitigation measures. At the site level, teams are required to update the status of extreme and high risks weekly, including ongoing mitigation efforts. Additionally, all sites must continuously identify and address risks, reporting the status of low, medium, and high risks to the head office on a monthly basis.

The Risk Management Committee and site teams evaluate a broad spectrum of risks, including geotechnical hazards, health and safety concerns, environmental impacts, property damage, social unrest, regulatory challenges, business disruptions, project delays, cost overruns, operational risks, resource development, metallurgy, executive risks, reputational threats, financial and economic uncertainties, climate change implications, and water scarcity risk.

Medium-level risk assessments address risks associated with business unit departments and ad-hoc projects. These assessments include Baseline Risk and Opportunity Assessment (BROA), Hazard Identification, Risk Assessment, and Determination of Control (HIRADC), Environmental Aspect and Impact Assessment, Hazard Operability (HAZOP), and Management of Change (MoC).

For low-level risks, assessments are carried out by small workgroups and individuals, using tools such as environmental safety work analysis, pre-task risk assessments, and critical risk management observations to ensure comprehensive risk monitoring at all levels. Merdeka's Risk and Opportunity Management approach is aligned with internationally recognized standards, including ISO 31000:2018 (Risk Management), ISO 45001:2018 (Occupational Health and Safety Management System), and ISO 14001:2015 (Environmental Management System), reinforcing the company's commitment to best practices in risk governance.

Tanggung Jawab dan Pengawasan Manajemen Risiko

Direksi Merdeka bertanggung jawab untuk mengawasi pelaksanaan Manajemen Risiko dan Peluang, memastikan bahwa strategi mitigasi risiko selaras dengan tujuan bisnis. Pengawasan ini mencakup laporan berkala dari Komite Manajemen Risiko dan Peluang.

Komite Manajemen Risiko dan Peluang, yang dipimpin oleh Presiden Direktur, terdiri dari eksekutif, manajer umum, dan manajer risiko. Komite ini bertanggung jawab untuk meninjau secara periodik kebijakan, strategi, target, dan pedoman manajemen risiko dan peluang Merdeka untuk memastikan pendekatan yang proaktif dalam mitigasi risiko. Fokus utama komite ini adalah identifikasi dan penilaian risiko yang terkait dengan Lingkungan, Sosial dan Tatakelola (ESG) termasuk aspek kesehatan dan keselamatan kerja, operasional dan perubahan iklim yang dapat berdampak pada perusahaan. Komite ini juga meninjau dan menyetujui langkah-langkah mitigasi untuk mengatasi risiko ekstrem dan tinggi, guna memperkuat ketahanan bisnis.

Untuk mengelola risiko secara efektif, Komite Manajemen Risiko dan Peluang bekerja sama dengan departemen audit internal, Komite Audit, dan auditor eksternal. Komite ini mengevaluasi area risiko kritis, seperti sistem operasional, risiko keuangan, dampak biaya dan profitabilitas, risiko penipuan, dan potensi penyalahgunaan wewenang.

Meningkatkan Budaya Manajemen Risiko melalui Pelatihan

Untuk memperkuat budaya manajemen risiko di seluruh organisasi, Merdeka secara aktif menyelenggarakan pelatihan dan sosialisasi standar risiko. Program ini dilakukan bersama tim pelatihan Kesehatan dan Keselamatan Kerja dan bertujuan untuk meningkatkan pemahaman tentang manajemen risiko di berbagai lokasi operasional, mendorong integrasi manajemen risiko di seluruh departemen, baik operasional maupun fungsional, dan mendukung koordinasi dan pelaporan risiko dalam sistem tata kelola perusahaan. Pada tahun 2025, pelatihan manajemen risiko telah diikuti oleh peserta yang berasal dari Tambang Emas Tujuh Bukit 34 orang, Tambang Tambaga Wetar 171 orang, Tambang Emas Pani 68 orang, Tambang Nikel Konawe 59 orang, dan Pabrik AIM 114 orang.

Responsibilities and Oversight of Risk Management

Merdeka's Board of Directors is responsible for overseeing the implementation of Risk and Opportunity Management, ensuring that risk mitigation strategies align with business objectives. This oversight includes regular reports from the Risk and Opportunity Management Committee.

The Risk and Opportunity Management Committee, led by the President Director, includes executives, general managers, and risk managers. The committee is responsible for periodically reviewing Merdeka's risk and opportunity management policies, strategies, targets, and guidelines to ensure a proactive approach to risk mitigation. A key focus of the committee is the identification and assessment of ESG-related risks, including social, environmental, health and safety, operational, and climate change risks that may impact the company.

The committee also reviews and approves mitigation measures to address extreme and high risks, strengthening business resilience.

To effectively manage risks, the Risk and Opportunity Management Committee collaborates with the internal audit department, Audit Committee, and external auditors. It evaluates critical risk areas, such as operational systems, financial risks, cost and profitability impacts, fraud risks, and potential misuse of authority.

Strengthening Risk Management Culture through Training

Merdeka is committed to embedding a strong risk management culture across the organization. To achieve this, the company actively conducts training and awareness programs in collaboration with the Occupational Health and Safety training team. These programs aim to enhance employees' understanding of risk management principles across operational sites; promote the integration of risk management across both operational and functional departments; and support risk coordination and reporting within the company's corporate governance framework. In 2025, risk management training was attended by 34 participants from the Tujuh Bukit Gold Mine, 171 participants from the Wetar Copper Mine, 68 participants from the Pani Gold Mine, 59 participants from the Konawe Nickel Mine, 114 participants from the AIM Plant.

Annexes

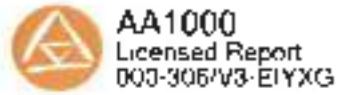
Lampiran



▲ Heavy equipments at BSI

Pernyataan Asurans Independen

Independent Assurance Statement [2-5] [G.1]



INDEPENDENT ASSURANCE STATEMENT

The 2025 Sustainability Report of PT Merdeka Copper Gold Tbk
Statement No: 522/TRID-A04/4/2026

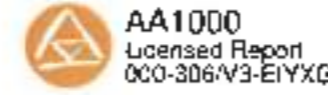
PT TÜV Rheinland Indonesia (hereinafter "TÜV Rheinland" or "we"), a global independent assurance service provider, has been engaged by the management of PT Merdeka Copper Gold Tbk (hereinafter referred to as "Merdeka" or "the Reporting Company") to provide an independent assurance over the 2025 Sustainability Report of PT Merdeka Copper Gold Tbk (hereinafter referred to as "the Report").

This assurance statement applies only to the relevant information included in the scope of the assurance. The entire content and information of the Report is the responsibility of Merdeka. The responsibility of the assurance team (the "Assurance Team" or the "Assurer") is to provide Merdeka and its stakeholders with an independent assurance statement based on our expert opinions by applying the verification methodology for the specified assurance scope. The objective of this assurance statement is to provide Merdeka's stakeholders with assurance on the reliability and objectivity of the information contained in the Report. The intended users of this assurance statement are stakeholders who are interested in Merdeka's overall sustainability performance and the impacts of its business activities.

SCOPE OF ASSURANCE AND SUBJECT MATTER

The scope of assurance engagement agreed upon with Merdeka includes the following:

- The reporting period: January 1 to December 31, 2025.
- The assurance covers the Report against the reporting criteria, including an evaluation of the quality, accuracy, and reliability of the performance information of the reporting company's subsidiaries as stated in the scope of the Report, namely PT Bumi Suksesindo (BSI), PT Batubara Kharisma Permai (BKP), PT Batubara Tembaga Raya (BTR), PT Merdeka Gold Resources Tbk, and PT Merdeka Battery Materials Tbk.
- Material topics identified and reported by Merdeka consist of 17 material topics (the "Subject Matter"). These material topics include the following:
 - Energy Management
 - Climate Change
 - Water and Wastewater
 - Waste Management
 - Land Reclamation and Site Closure
 - Biodiversity Preservation
 - Toxic Emissions
 - Occupational Health and Safety (OHS)
 - Employee Training and Development
 - Diversity, Equity and Inclusion (DEI)
 - Local Procurement
 - Financial Performance and Economic Contribution
 - Community Development and Empowerment
 - Human Rights
 - Business Ethics and Integrity
 - Responsible Supply Chain
 - Risk and Opportunity Management



REPORTING CRITERIA AND FRAMEWORK

- Reporting in accordance with the Global Reporting Initiative Standards 2021 ("GRI 2021")
- GR 14 Mining Sector 2024
- The Regulation of Financial Services Authority Number 51/POJK.03/2017 on the Implementation of Sustainable Finance for Financial Services Institutions, Issuers, and Public Companies
- The Circular Letter of The Financial Services Authority Number 16/SE/0JK.04/2021 on the Form and Content of the Annual Report of Issuers or Public Companies
- Task Force on Climate-Related Financial Disclosure (TCFD)

ASSURANCE STANDARD AND LEVEL OF ASSURANCE

The independent assurance was conducted in accordance with:

- AA1000AP (2018) Principles, covering the accountability principles of inclusivity, materiality, responsiveness, and impact (the "AA1000AP (2018) Principles").
- AA1000AS v3 with assurance engagement: **Type 2** and level of assurance: **Moderate**.

LIMITATIONS

The assurance was performed at a moderate assurance level in accordance with AA1000AS. The information and performance data subject to assurance is limited to the content of the Report and supporting data provided by the reporting organization. It implies that no significant errors were found during the assurance process and that there are limitations related to the unavoidable risks that may exist.

ASSURANCE METHODOLOGY

We have evaluated the overall sustainability strategy, targets and commitments disclosed in the Report. We have performed an objective review of the reported information and evidence gathered against the criteria defined in the assurance standards, i.e. the accountability principles of inclusivity, materiality, responsiveness and impact. The processes and system controls applied by the Reporting Company in the disclosure of quantitative and qualitative information on sustainability performance, from source to aggregation, were evaluated. Analytical procedures, interviews, and data testing were performed on a sample basis to test the generation and collection of data for defined sustainability key performance indicators in accordance with Merdeka's corporate sustainability strategy, governance, and management systems as disclosed in the Report. Our work included interviews with Merdeka representatives including senior management at the executive and functional levels, as well as relevant employees responsible for collecting, aggregating and reporting the data. The assurance work was performed by our multidisciplinary team of experienced professionals in the areas of corporate sustainability, climate change, environmental, social, governance and stakeholder engagement. The opinion expressed is based on a moderate level of assurance and at the level of materiality of the Assurer's professional judgment.

ADHERENCE TO THE AA1000AP (2018) PRINCIPLES

Inclusivity:

Merdeka ensures inclusiveness by proactively identifying and engaging with diverse stakeholder groups, whose concerns are systematically addressed throughout the Report. Its approach to stakeholder



engagement is supported by formal strategies designed to foster ongoing communication and collaboration. This commitment comes from the highest levels of leadership within the organization. Engagement activities include a variety of formats, including customer and employee surveys, meetings, and group discussions. Each interaction is carefully documented, and dedicated personnel are responsible for managing the feedback received. In addition, Merdeka is transparent in communicating sustainability goals and commitments to stakeholders. This ensures that stakeholders are well-informed about initiatives and progress toward its sustainability goals.

Materiality:

Merdeka has systematically conducted a materiality assessment of sustainability issues, taking into account the industry landscape, due diligence findings, risk assessments and stakeholder engagement. This assessment, which has become an annual practice, is a cornerstone of their commitment to sustainability. The Sustainability Committee, reflecting top management's commitment, carefully reviews and approves the list of material issues. The materiality assessment provides a comprehensive understanding of the relevant issues. These material issues are then methodically addressed in specific sections, each outlined by measurable metrics. Merdeka's senior management and cross-functional teams are well versed in these processes, which are informed by extensive documentation and interviews.

Responsiveness:

Merdeka is committed to addressing stakeholder concerns through a multi-faceted approach embedded in the sustainability strategy, policies, procedures, code of conduct and established sustainability goals. Merdeka actively promotes stakeholder engagement through various channels, including multi-stakeholder platforms and customer interfaces. In particular, the dialog-driven approach is exemplified throughout the Report.

Impact:

Merdeka adheres to the GRI 2021 which prioritize the assessment of internal and external impacts. Merdeka has systematically identified the impacts associated with its operations and products. Their commitment to impact assessment is reflected in careful documentation and tracking of impacts through internal processes and systems. Impact analysis covering environmental, economic, social, people and its human rights. In addition, their commitment to identifying and mitigating negative impacts is evident in their annual risk and materiality assessment.

STATEMENT OF RESPONSIBILITY OF THE MANAGEMENT OF MERDEKA

The Management of Merdeka has sole responsibility for preparing and presenting the Subject Matter (material topics) in accordance with GRI 2021 and preparing the Report in adherence to the AA1000AP (2018) Principles. Merdeka's responsibilities also include maintaining effective internal controls over the information and data, resulting in the preparation of the Subject Matter in a way that is free from material misstatements.



STATEMENT OF RESPONSIBILITY, COMPETENCY, INDEPENDENCY AND IMPARTIALITY OF ASSURANCE PROVIDER

TÜV Rheinland ensures that appropriately qualified individuals are selected based on their qualifications, training and experience. We have maintained complete impartiality and independence throughout the assurance engagement and have not been involved in the preparation of the content of the Report or provided any related information. The assurance statement is only valid if it is published in its entirety with the Report. TÜV Rheinland does not accept any liability or responsibility to any third party for any perception or decision regarding Merdeka based on this assurance statement.

CONCLUSION AND OPINION

In conclusion, we can mention that no instances or information came to our attention that would be contrary to the statement made below.

- The Report meets the requirements of the AA1000AP Accountability Principles
- The Report meets the requirements of Type 2, Moderate Assurance Level according to the AA1000AS v3 and follows the requirements of reporting in accordance with GRI 2021.
- The Report contains statements and claims that reflect Merdeka's sustainability achievements and challenges, supported by documentary evidence and internal records
- The Assurer concludes that the Report for all the performance indicators related to the material topics are reasonably represented and nothing has come to our attention that would cause us to believe that Merdeka has not presented accurate and not reliable data.

For and on behalf of PT TÜV Rheinland Indonesia
Jakarta, 23 April 2026



Nyoman Susila
President Director



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INDEKS ISI GRI STANDARDS 2021 GRI STANDARDS 2021 CONTENT INDEX

Statement of use	PT Merdeka Copper Gold Tbk has reported in accordance with the GRI Standards for the period 1 Jan 2025 – 31 Dec 2025
GRI 1 used	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s)	GRI 14: Mining Sector 2024

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Hak-hak Masyarakat Adat <i>Rights of Indigenous People</i>	14.11.1 14.11.2 14.11.3 14.11.4	Tidak ada masyarakat adat teridentifikasi di dalam dan/atau di sekitar operasional Merdeka. <i>There are no indigenous people identified in and/or adjacent to Merdeka's operations.</i>
Hak atas Tanah dan Sumber Daya <i>Land and Resource Rights</i>	14.12.1 14.12.2 14.12.3	Tidak ada pemukiman kembali secara paksa dan konflik atau pelanggaran hak atas tanah dan sumber daya. <i>There are no involuntary settlement and conflict or violations of land and resource rights.</i>
Pertambangan Rakyat dan Pertambangan Skala Kecil <i>Artisanal and Small-scale Mining</i>	14.13.1 14.13.2 14.13.3	Topik Pertambangan Rakyat dan Pertambangan Skala Kecil dianggap material di entitas anak yaitu PT Merdeka Gold Resources Tbk. (Penjelasan lebih detail dapat dilihat di Laporan Keberlanjutan 2025 PT Merdeka Gold Resources Tbk halaman 132) <i>Artisanal and Small-scale Mining is considered material topic by business unit, PT Merdeka Gold Resources Tbk. (Further explanation can be found in PT Merdeka Gold Resources Tbk's 2025 Sustainability Report page 132)</i>
Manajemen krisis <i>Crisis management</i>	14.15.1 14.15.2	Merdeka telah memiliki Sistem Manajemen Krisis serta Standar Manajemen Insiden yang diterapkan di seluruh area operasi. Sepanjang tahun 2025, tidak terdapat pelanggaran terhadap ketentuan hukum yang mengakibatkan denda, sanksi non-moneter, maupun bentuk sanksi hukum lainnya dari otoritas yang berwenang, termasuk Otoritas Jasa Keuangan (OJK) dan Bursa Efek Indonesia (BEI) yang berkaitan dengan insiden kritis. (Penjelasan lebih detail dapat dilihat di halaman 111) <i>Merdeka has implemented a Crisis Management System and Incident Management Standard across all operational areas. In 2025, there were no violations of applicable laws resulting in fines, non-monetary sanctions, or other legal penalties from authorities, including the Financial Services Authority (OJK) and the Indonesia Stock Exchange (IDX), related to critical incidents. (Further explanation can be found in page 111)</i>
Pajak <i>Tax</i>	14.23.3 14.23.4 14.23.5 14.23.6 14.23.7 14.23.8	Pada tahun 2025 Merdeka tidak mendapatkan bantuan finansial yang diterima dari pemerintah. Perusahaan senantiasa mematuhi peraturan perundang-undangan yang berlaku, termasuk ketentuan dalam Undang-Undang No. 28 Tahun 2007 tentang Ketentuan Umum dan Tata Cara Perpajakan. Selama periode pelaporan, perusahaan tidak terlibat dalam proses hukum yang berkaitan dengan pelanggaran peraturan perpajakan. <i>In 2025, Merdeka did not receive any financial assistance from the government. The company consistently complies with applicable laws and regulations, including the provisions of Law No. 28 of 2007 on General Provisions and Tax Procedures. During the reporting period, the company was not involved in any legal proceedings related to violations of tax regulations.</i>

Kontribusi politik <i>Political contribution</i>	14.24.1 14.24.2	Perusahaan tidak memberikan kontribusi dalam bentuk apa pun kepada partai politik, calon legislatif, maupun kegiatan politik, sesuai dengan Undang-Undang No. 7 Tahun 2017 tentang Pemilihan Umum, serta Undang-Undang No. 2 Tahun 2008 tentang Partai Politik sebagaimana telah diubah dengan Undang-Undang No. 2 Tahun 2011. Pedoman Perilaku telah melarang kontribusi politik yang mengatasnamakan dan/atau menggunakan fasilitas perusahaan. <i>The Company does not make contributions of any kind to political parties, legislative candidates, or political activities, in accordance with Law No. 7 of 2017 on General Elections and Law No. 2 of 2008 on Political Parties as amended by Law No. 2 of 2011. The Code of Conduct prohibits political contributions made in the name of and/or using Company resources.</i>
Kawasan terdampak konflik dan berisiko tinggi <i>Conflict-affected and High-risk Areas</i>	14.25.1 14.25.2 14.25.3 14.25.4	Selama tahun 2025, Merdeka tidak beroperasi dan membeli bahan baku yang berasal dari atau melewati wilayah yang terdampak konflik dan berisiko tinggi (CAHRA). <i>During 2025, Merdeka did not operate in or procure raw materials from or through conflict-affected and high-risk areas (CAHRA).</i>

INDEKS ISI POJK 51/POJK.03/2017

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5.	Tantangan dalam menerapkan keuangan berkelanjutan <i>Challenges in implementing sustainable finance</i>	
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1.	Pencapaian kinerja penerapan keberlanjutan (ekonomi, lingkungan hidup, dan sosial) dibandingkan dengan target <i>Achievement of sustainability implementation performance (economic, environmental, and social) compared to the target</i>	
2.	Prestasi dan tantangan termasuk peristiwa penting selama periode pelaporan <i>Achievements and challenges including key events during the reporting period</i>	
C.	Strategi pencapaian target <i>Target achievement strategy</i>	
1.	Informasi pengelolaan risiko atas penerapan keuangan berkelanjutan terkait aspek ekonomi, lingkungan hidup, dan sosial yang berpotensi mempengaruhi keberlanjutan emiten dan perusahaan publik <i>Information on risk management on the implementation of sustainable finance related to economic, environmental, and social aspects that have the potential to affect the sustainability of issuers and public companies</i>	
2.	Pemanfaatan peluang dan prospek usaha <i>Utilization of business opportunities and prospects</i>	
3.	Penjelasan situasi eksternal ekonomi, lingkungan hidup, dan sosial yang berpotensi mempengaruhi keberlanjutan emiten dan perusahaan publik <i>Explanation of external economic, environmental, and social situations that have the potential to affect the sustainability of issuers and public companies</i>	
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B.	Penjelasan peran anggota Direksi dan anggota Dewan Komisaris dalam mengelola, melakukan telaah berkala, dan meninjau efektivitas proses manajemen risiko yang dijalankan oleh Emiten dan Perusahaan Publik <i>Explanation of the roles of members of the Board of Directors and members of the Board of Commissioners in managing, conducting periodic reviews, and reviewing the effectiveness of the risk management process carried out by Issuers and Public Companies</i>	
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B.	Pendekatan yang digunakan Emiten dan Perusahaan Publik dalam melibatkan pemangku kepentingan dalam penerapan Keuangan Berkelanjutan, antara lain dalam bentuk dialog, survei, dan seminar <i>The approach used by Issuers and Public Companies in involving stakeholders in the implementation of Sustainable Finance, among others in the form of dialogues, surveys, and seminars</i>	

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Task Force on Climate-related Financial Disclosures (TCFD)

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Tata Kelola Governance			
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B	Menjelaskan peran Direksi dalam menilai dan mengelola risiko dan peluang terkait iklim.	<i>Describe management's role in assessing and managing climate-related risks and opportunities.</i>	71
Strategi Strategy			
A	Menjelaskan risiko dan peluang terkait iklim yang telah diidentifikasi organisasi dalam jangka pendek, menengah, dan Panjang.	<i>Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.</i>	72
B	Menjelaskan dampak risiko dan peluang terkait iklim pada bisnis, strategi, dan perencanaan keuangan organisasi.	<i>Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning.</i>	72
C	Menjelaskan ketahanan strategi organisasi, dengan mempertimbangkan berbagai skenario terkait iklim, termasuk skenario 2°C atau lebih rendah.	<i>Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario</i>	72
Manajemen Risiko Risk Management			
A	Menjelaskan proses organisasi untuk mengidentifikasi dan menilai risiko terkait iklim.	<i>Describe the organization's processes for identifying and assessing climate-related risks.</i>	71
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Metrik dan Target Metrics and Targets			
A	Mengungkapkan metrik yang digunakan oleh organisasi untuk menilai risiko dan peluang terkait iklim sejalan dengan strategi dan proses manajemen risikonya.	<i>Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.</i>	80-81, 86-91
B	Mengungkapkan Cakupan 1, Cakupan 2 dan, jika sesuai, emisi gas rumah kaca (GRK) Cakupan 3 serta risiko terkait.	<i>Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.</i>	86-91
C	Menjelaskan target yang digunakan oleh organisasi untuk mengelola risiko dan peluang terkait iklim serta kinerja terhadap target.	<i>Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets</i>	80-81, 86-91

Formulir Tanggapan

Feedback Form [G.2]

Nama/Name : _____

Institusi/Institution : _____

Saya berasal dari kelompok Pemangku Kepentingan:
I'm representing:

<input type="checkbox"/>	Pemegang Saham (shareholder)	<input type="checkbox"/>	Pemasok/Kontraktor (supplier/contractor)
<input type="checkbox"/>	Karyawan (employee)	<input type="checkbox"/>	Jurnalis/Media (journalist/media)
<input type="checkbox"/>	Pelanggan (customer)	<input type="checkbox"/>	Akademisi (academic)
<input type="checkbox"/>	Pemerintah/regulator (government/regulatory body)	<input type="checkbox"/>	LSM (NGO)
<input type="checkbox"/>	Masyarakat Sekitar (local community)	<input type="checkbox"/>	Lainnya (mohon sebutkan) (Other, please specify)

Bagaimana menurut Anda Laporan Keberlanjutan Merdeka:
How do you rate our Sustainability Report:

	Buruk Poor	Rata rata Average	Baik Good	Sangat Baik Excellent
Apakah laporan ini mudah dipahami? Do you find the report easy to understand?				
Apakah informasi dalam laporan ini telah menggambarkan dampak positif dan negatif dari perusahaan? Does the report has described positive and negative information of the company?				
Apakah informasi terkait lingkungan, sosial, dan tata kelola (LST) yang dicantumkan dalam laporan ini sudah memadai? Does the report have sufficient information related to Environment, Social, and Governance?				
Menurut Anda, bagaimana kinerja kami di bidang lingkungan? How would you rate our environmental performance?				
Menurut Anda, bagaimana kinerja kami di bidang ekonomi dan keuangan? How would you rate our economic and financial performance?				
Menurut Anda, bagaimana hubungan kami dengan pekerja dan komunitas masyarakat? How would you rate our employee engagement and community involvement?				

Informasi yang Anda ingin kami cantumkan dalam laporan berikutnya:
Information that you would like us to discuss further in the next report are:



Corporate Secretary
PT Merdeka Copper Gold Tbk,
Treasury Tower, 67-68th Floor
District 8 SCBD Lot. 28
Jl. Jend. Sudirman Kav. 52-53
Senayan, Kebayoran Baru, South Jakarta 12190
DKI Jakarta, Indonesia

Telephone: +62 21 39525580
Facsimile: +62 21 39525589
corporate.secretary@merdekcoppergold.com

Terima kasih atas partisipasi Anda | Thank you for your participation.

Jika terdapat pertanyaan mengenai laporan ini atau isi dari laporan ini, pembaca dapat menghubungi: [2-3]

If you have any questions about this report or its contents, you can contact:

▲ Wetland at SCM's site