

**MALAYSIA SMELTING CORPORATION BERHAD**  
**2024 PUBLIC DUE DILLIGENCE REPORT**

**1. Company Information**

Malaysia Smelting Corporation Berhad (“MSC”) is a public listed Malaysia-based tin producer with mining and smelting operations since 1901. MSC which is one of the world’s largest tin producers is an international custom tin smelter. It’s smelting facilities are located in Butterworth, Penang (CID001105) and Pulau Indah, Selangor (CID004434) respectively. MSC’s feed sources straddle the globe. For more details, please visit <http://www.msmelt.com/>. MSC constantly promotes responsible sourcing practices throughout its supply chain and is a member of the International Tin Association (ITA).

**2. RMAP Assessment Summary**

MSC is a member of ITA Tin Supply Chain Initiative (ITSCI), which has developed a due diligence program for a better and transparent supply chain of minerals that will strengthen the security and improve the livelihoods in conflict affected and high-risk areas. ITSCI also monitors the performance of due diligence and responsible sourcing activities of all its members.

MSC BW was successfully assessed in March 2024 and it remains on the Conformant List.

MSC PI’s maiden assessment was successfully conducted by PT UL in January 2024 for the period 2023. The next assessment is slated for January 2025.

**3. Company Supply Chain Policy**

MSC has developed and implemented its conflict free supply chain policy that meets the requirements of the global audit standards including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Area (CAHRA), the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act and the new European Union Regulations on Mineral Supply Chains. MSC participates in initiatives that aim to address the CAHRA issues and those defined in the OECD Annex II to ensure that trade will continue and in compliance with requirements of the international community. MSC will suspend or terminate business relationship with suppliers who

supply materials from mines which come under the Annex II risks and those who do not address known risks. The policy which has been widely disseminated to all stakeholders, was reviewed and approved by the Senior Management, who are committed to support its implementation, and is available at <http://msmelt.com/policy-on-conflict-minerals.php>

#### 4. Company Management System

MSC has developed and implemented a due diligence management system that aligns with the Organization for Economic Co-operation and Development (OECD) and the United Nations (UN) guidelines for company due diligence on minerals from CAHRA countries. A Senior Management personnel has been appointed as the Management Representative who is responsible for supply chain and due diligence. The Management Representative reports directly to the GCEO of the company. The Management Representative coordinates all jobs and responsibilities of various departments to ensure that all departments follow through and implement due diligence processes according to the due diligence policy. MSC conducts annual training for key staff from relevant departments required in the due diligence process. MSC will carry out additional training whenever there is an update in the RMAP/ITSCI program.

#### 5. Internal Control System

Prior to starting any business, MSC ensures that all suppliers are conflict free and are responsibly sourcing their materials. The suppliers must comply with MSC's due diligence and supply chain policy. MSC communicated the supply chain policy and responsible sourcing requirements to all suppliers in 2024. MSC has also incorporated due diligence requirements into legally binding agreements with all suppliers and have established robust policies and processes to prevent the entry of conflict minerals that may be mined illegally into its supply chain. For Grievance Mechanisms, MSC refers to <https://www.msmelt.com/policy-on-conflict-minerals.php>

#### 6. EITI Principles and Reporting

MSC is committed to supporting the 12 general principles and implementation of the Extractive Industries Transparency Initiative (EITI), recognizing the importance of transparency and accountability in the natural resource sector. While MSC's smelting sites are not in scope of formal EITI reporting, and are not located in an EITI implementing country, nevertheless we ensure that all relevant taxes, fees and/or

royalties are paid to our government. When sourcing from CAHRA, we take additional steps to evaluate and encourage EITI implementation in our supply chain by understanding which CAHRA are also EITI implementing countries. When sourcing from large scale mining companies in scope of EITI reporting, we ask those suppliers to provide evidence of fulfilling those requirements. In the relevant period MSC sourced from three CAHRAs (DRC, Rwanda and Burundi) of which it identified the DRC as an EITI implementing country.

## 7. Record Keeping System

All relevant data (shipping documents) are safely documented for the duration of 5 years.

## 8. Risk Identification

In accordance with the Internal Control System, the responsible sourcing team implements procedures to identify and assess risks when sourcing from conflict-affected and high-risk areas (CAHRAs).

### 8.1 CAHRA identification process

MSC has established a procedure to identify CAHRAs and determines CAHRAs on the basis of:

- a. Dodd-Frank Wall Street Reform and Consumer Protection Act ‘US Dodd-Frank Act’ Section 1502 <https://www.sec.gov/rules/final/2012/34-67716.pdf>
- b. Heidelberg Conflict Barometer: Presence of armed conflict and widespread violence <https://hiik.de/conflict-barometer/current-version/?lang=en>
- c. Fragile States Index: Human Rights (Political Indicator P3) <https://fragilestatesindex.org/global-data/>
- d. Fragile States Index: Overall Index (Governance Risk Ratings) <https://fragilestatesindex.org/global-data/>
- e. EU CAHRA List <https://www.cahaslist.net>

### 8.2 KYC procedure

MSC has implemented a KYC questionnaire to collect information such as supplier identity, legal status, ultimate beneficiary, due diligence conducted by the suppliers, origin of material and transport routes. MSC’s due diligence team has reviewed the information provided and conducted checks against sanctions lists under US, UN and EU. In case incomplete information is found in the KYC form, MSC will then ask the supplier to provide additional information. At the time this report was prepared, no warning signals were identified in relation to the submitted KYC forms.

### 8.3 Chain of custody/origin determination

MSC requires origin information for each material transaction and ensures that it is able to understand the transaction origin and transportation route, as well as direct suppliers' names and locations.

### 8.4 Review and verify information

MSC's responsible sourcing team will review and compare all information against its CAHRA list, relevant sanctions lists, local laws and internal sourcing requirements. MSC reviews documentation provided by the suppliers and also cross checks it against external sources and the news media. Whenever discrepancies are identified or clarification is needed, MSC will communicate with the suppliers and request the required information or an update.

### 8.5 Result of risk identification

Based on the risk identification process, MSC has both high-risk sourcing and low-risk sourcing. Furthermore, some supply chains have triggered red flags.

## 9. Risk Assessment (HIGH RISK SOURCING ONLY)

Desktop based research or on the ground assessment will be conducted for each supply chain flagged as a red flag to ascertain whether there is a risk of any form of torture, cruelty, inhuman and degrading treatment, forced or compulsory labour, child labour, other gross human rights violations, war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide, as well as direct or indirect support to non-state armed groups, direct or indirect support to private security forces, bribery and fraudulent misrepresentation of the origin of minerals, such as money laundering or non-payment of taxes, fees and royalties (together the "Annex II risks").

For materials from the Great Lakes Region, MSC uses ITSCI upstream assurance program to ensure that all materials are responsibly sourced from the areas. The ground assessment by ITSCI is an important source of information to determine the transparency in the supply chain. MSC has also resumed on the ground assessment to demonstrate its commitment to engage directly with stakeholders in the tin supply chain. For each high-risk sourcing transaction, ITSCI provides the following documents:

1. Incident summary reports as they become available
2. Mine visit recommendations including a list of mine sites with potential risks (it is advised that the companies sourcing from these mine sites conduct enhanced due diligence and risk assessment).

3. Monthly country and region report, which reviews the general situation on the ground.
4. Data summary and other reports.

For material which triggers red flag, MSC will conduct a subnational review and/or work with suppliers to conduct site visits to verify whether the supply chain involves any OECD Annex II risks. MSC has conducted further due diligence by reviewing these documents from the upstream program against information in the public domain and the actual transaction information to assess the level of risk. If there is insufficient information to identify and assess risks, MSC will conduct on-the-ground assessment.

MSC has stopped sourcing from a country in EU which has begun waging war with a neighboring country.

### 9.1 Results of Risk Assessment

Raw materials originating from CAHRA countries like the DRC and Rwanda have been subjected to comprehensive on the ground assessment by ITSCI assurance mechanism. The materials are fully tagged to ensure chain of custody from mine to smelter, complete with full documentation to support this. No OECD Annex II risks were identified.

## 10. Risk Mitigation (HIGH RISK SOURCING ONLY)

MSC has an elaborate risk mitigation plan based on the identification and assessment of supply chain risks in accordance with the OECD Guidance Annex II Model Policy. MSC focuses on reading ITSCI reports and documents, such as incident reports, management assessment reports, and corporate audit reports. The following measures are also taken to mitigate risks.

- a) Conduct further desktop-based research by reviewing relevant documents from upstream programs against information in public domain and actual transaction information.
- b) Request the following documented information from all suppliers: supplier's due diligence plan including KYC questionnaire, company registration certificate or company business license and mining certificate (in case of mining companies).
- c) Pay close attention to governance information related to the local company's operations/country context.
- d) Collect chain-of-custody documentation for each transaction in supply chain to understand the source of transaction and transportation route.
- e) Conduct due diligence on suppliers in high-risk areas through mine visits, document inspections and interviews with miners, consultation with local communities and other stakeholders
- f) Suppliers are actively encouraged to take part in the RMAP program to understand the risk in their supply chain on the sourced minerals.

## 10.1 Results of Risk Mitigation

Risk mitigation measures adopted by upstream assurance program like ITSCI has been effective in minimizing risk or completely eliminating risks in CAHRA countries DRC, Rwanda and Burundi. We continue to engage with ITSCI to enhance the effectiveness of their process by providing feedback during our discussions with them and also provide feedback from our suppliers who have been sourcing from these countries.

## 11. Summary

MSC has always maintained a high standard of due diligence which covers risk assessment and mitigation of such risks as highlighted above. For the year of 2024, we continued to use the risk assessment tools and other resources to determine raw materials originating from Conflict-Affected and High-Risk Areas. These sources were scrutinized with respect to supply chain and direct engagement with suppliers.



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**Mr. Wong Kin Nyap**  
**Chief Technology Officer**  
**Management Representative**