

LANDSCAPE LEVEL

NATURE RISK ASSESSMENT

MINING RELATED ACTIVITIES ON
OBI ISLAND, NORTH MALUKU,
INDONESIA

REPORT SUMMARY
JANUARY 2025



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SUMMARY INTRODUCTION

At Harita Nickel, we recognize that responsible mining extends beyond operational boundaries, it requires a deep understanding of the broader landscape in which we operate. To this end, we recently undertook a Landscape-Level Nature Risk Assessment (LNRA) to evaluate the potential environmental and social risks and impacts of our operation on Obi Island.

This assessment, conducted by PT Inovasi Digital untuk Transformasi (PTID), the consultancy arm of Earthqualizer Foundation, provides an island-wide perspective on land use, biodiversity, and conservation opportunities.

The LNRA identifies 16 nature-related risks and presents a "Responsible Mining" scenario that balances industrial development with ecological protection. The findings of this study are shaping our expansion planning and biodiversity commitments, with a goal of achieving conservation net gain by 2043. Importantly, the assessment examines landscapes beyond our operational footprint, considering physical, commercial, administrative, natural, and community landscapes to ensure a holistic approach to risk management.

While we are committed to transparency, the full research report cannot be publicly released due to its inclusion of private and public entities beyond our operations. However, we are sharing this summary to engage with stakeholders on key findings and recommended mitigation measures.

REVIEW PROCESS

To ensure a rigorous review process, we invited several experts to provide insights into this summary, including Steven Brown, an International expert in responsible mining and metals. His perspectives and comments feature throughout this summary to clarify our approach, each addressing a unique perspective, each helping us align with global best practices in responsible mining.

We further invite stakeholders to explore the LNRA summary, which outlines our approach to nature risk assessment, our commitment to responsible land use, and our next steps in conservation and risk mitigation.

“This assessment is just the beginning. We will continue refining our strategies, engaging with stakeholders, and updating our findings as part of an ongoing commitment to responsible mining.” - Harita Nickel

COMMENTARY BY STEVEN BROWN

‘INTERNATIONAL EXPERT IN RESPONSIBLE MINING AND METALS’

PT Trimegah Bangun Persada also known as *Harita Nickel* has taken a pioneering approach to sustainability, showing genuine leadership by pushing the boundaries of what it means to be a responsible producer of lateritic nickel. The LNRA sets the company apart from its peers, including some of the more established large Indonesian producers. This is the first island-wide comprehensive nature study undertaken by any Indonesian nickel producer. It has been undertaken at the company's own initiative, demonstrating a commitment to go well beyond regulatory requirements.

The company's public disclosures include some ambitious goals and commitments, including the Group's 10-year sustainability vision of being a leader in responsible mining and the company's goal of conservation net gain by 2043. The LNRA is a significant and tangible demonstration of these commitments. It sends a strong signal to stakeholders of the company's sincerity. It shows how corporate-level leadership is translated to better outcomes on the ground for nature and society.

COMPANY APPROACH TO NATURE RISK MANAGEMENT

PT TBP has a strong history of innovation in Indonesia's mining and metals sector. The company was an early adopter of the government's value-adding policy, developing one of the country's first modern smelters. PT TBP also pioneered the development of a high-pressure acid leach (HPAL) plant, becoming the first Indonesian producer of mixed-sulfide precipitate and later, the first to produce nickel sulfate for the electric vehicle battery sector.

Continuing this tradition of innovation, PT TBP's LNRA is the first of its kind in Indonesia, addressing the nature-related risks associated with nickel production at a landscape level.

Recognizing the strategic importance of landscape-scale approaches, PT TBP understands that traditional, project-by-project assessments of nature-related risks are no longer sufficient. This is particularly critical in Indonesia, which has become the world's leading nickel producer, accounting for around 60% of global output in 2024. The concentration of this production within a region of high biodiversity necessitates a new approach to nature-related risk management, one that considers the cumulative impacts of multiple mining and industrial projects.

Landscape-scale approaches are crucial for effectively accounting for cumulative impacts because they consider the interconnectedness of ecosystems and the combined effects of multiple activities across a broader area. PT TBP acknowledges that impacts do not stop at arbitrary borders. The company knows that ecosystems are complex webs of interactions that can be subject to multiple stressors simultaneously.

Landscape-scale approaches also better enable the management of nature-related risks. They facilitate integrated planning and management by bringing together different stakeholders and sectors, leading to more holistic and sustainable solutions.

REVIEWER NOTES AND INSIGHTS

Proactive risk management: The LNRA identifies 16 distinct nature risks, which is a key step in managing cumulative environmental impact. This identification of specific risks is the bridge between the company's corporate-level commitments and on-the-ground action to protect and enhance nature.

Commitment to biodiversity net gain: PT TBP's goal to achieve biodiversity net gain by 2043 is ambitious and praiseworthy. This commitment indicates a long-term vision that extends beyond immediate operational needs.

Island-wide evaluation: The scope of the LNRA extends beyond PT TBP's operational boundaries to offer an 'island-wide evaluation' of the landscape, including the surrounding marine environment and the island's interactions with the atmosphere. This broader perspective considers the interconnectedness of the ecosystem and the potential impact of mining on the wider environment.

Use of TNFD framework: Aligning the LNRA with the Taskforce for Nature-related Financial Disclosures (TNFD)'s LEAP approach demonstrates a commitment to following international best practices. This approach prioritizes identifying and assessing risks and also supports the mitigation of transition and systemic risks.

Comprehensive methodology: The study uses a variety of data sources, including thematic maps, satellite imagery, and focus group interviews. Field-based studies were also conducted where appropriate. The scale of this undertaking is significant, going well beyond a business-as-usual approach.

Stakeholder engagement: PT TBP has shown a commitment to engaging with multiple stakeholders, including joint venture partners, suppliers, government agencies, local communities, NGOs, investors and downstream customers. The inclusion of focus groups with diverse representation is a positive step.

Transparency: The company's commitment to regular public disclosure of its efforts regarding nature risks is crucial for stakeholder engagement. The reviewer recognizes the sensitivity of the full LNRA, as it deals with impacts from other private and public activities, and complex risks that can often be misinterpreted or misrepresented. As such, the reviewer supports the use of the full LNRA report as an internal document, and applauds the company's initial high-level disclosures.

Prioritization of avoidance and minimization: The LNRA adheres to mitigation hierarchy principles based on the SBTN AR3T framework, which prioritizes avoiding and minimizing negative impacts over compensation measures. Biodiversity offsets are also used where appropriate, in keeping with the company's commitment to conservation net gain.

“The LNRA is a significant and tangible demonstration of PT TBP’s ambitious commitments. It sends a strong signal to stakeholders of the company’s sincerity. It shows how corporate-level leadership is translated to better outcomes on the ground for nature and society.” - Steven Brown

BUILDING ON THE LNRA FOUNDATION

‘REVIEWER RECOMMENDATIONS’

The reviewer sees this initial LNRA as a starting point for more assessments and efforts and makes the following recommendations:

Expanded scope: the LNRA rightly focused on land-based risks. This is a logical area of focus for an initial study. The reviewer recommends that future studies could go into greater depth with respect to cumulative water risks, and cumulative air quality impacts across the island, particularly from particulate and sulfur dioxide emissions.

Local stakeholder engagement: PT TBP cannot mitigate landscape-scale risks alone. The company must work in partnership with other local stakeholders, including other mining companies, forestry companies, community groups and local government agencies. To this end, PT TBP has a stakeholder engagement plan, which will incorporate key issues from the LNRA.

Disclosure of nature-related risk: As a public company, PT TBP understands the importance of transparency, including with respect to nature-related risk. For this reason, the LNRA aligns with the TNFD methodology. Going forward, the company will make appropriate disclosures to ensure all stakeholders understand the key risks and how these are being addressed. The reviewer recommends that the company works towards full TNFD-aligned disclosures in future years.

Incorporate findings into standard operating procedures (SOPs): PT TBP is using the LNRA to inform its strategy, including its mine plan. As more information becomes available, the reviewer recommends that the company reviews and updates its SOPs, particularly those related to land acquisition, surveys, community relations, land clearing and rehabilitation, to ensure that the LNRA findings and recommendations are properly considered.

Long-term monitoring: The company plans to implement regular remote monitoring of land-use changes on Obi Island. It is the reviewer’s opinion that this continued monitoring will assist the company in ensuring compliance and addressing any detected deforestation alerts.

“The LNRA has provided the company with a number of recommendations that will shape its future plans on Obi Island. This will enable an evidence-based and risk-based approach to responsible operations. “

- Steven Brown

REVIEWER CONCLUSION

The LNRA represents a significant step forward for PT TBP in its approach to responsible mining. The study shows a clear commitment to understanding and addressing the environmental impacts of mining on Obi Island and represents the type of effort needed for a company to achieve net positive environmental outcomes.

The reviewer encourages PT TBP to continue its sustainability journey and to maintain its ambitious targets. Building on existing and new partnerships, PT TBP should use its pioneering leadership to set a platform for sustainable growth of the company but also to be an example for others to follow.

The reviewer is pleased to see that PT TBP continues to respond to comments raised during the review process. The reviewer encourages PT TBP to lead and to use its operations and influence to contribute to a nature-positive Obi Island and to a better world.

TRANSPARENCY STATEMENT

PT TBP is committed to stakeholder engagement to challenge and inform strategy and review material issues and reports. As part of this commitment, the company sought stakeholder input on its recently completed inaugural landscape-scale nature risk assessment ('LNRA').

This included seeking an independent international expert, Steven Brown, to review a summary report of the LNRA ('LNRA summary'). The review is designed to provide PT TBP with an external forum for discussion on landscape-scale approaches to nature risk management, provide material feedback on progress being made, identify ways to help achieve its ambitions, and to prepare a review statement to inform other stakeholders.

The reviewer, Steven Brown, was selected based on his level of knowledge and skills relevant to PT TBP. The statement herein represents the personal views of the reviewer. The review did not include assurance or verification of performance data underlying the LNRA. The reviewer had access to the LNRA summary, but did not review the entire LNRA.

"The LNRA is a pioneering initiative, not required by regulation or even by most stakeholder expectations, but one which the company has identified as crucial for the advancement of its sustainability vision."

-Steven Brown

LANDSCAPE-RELATED NATURE RISK ASSESSMENT



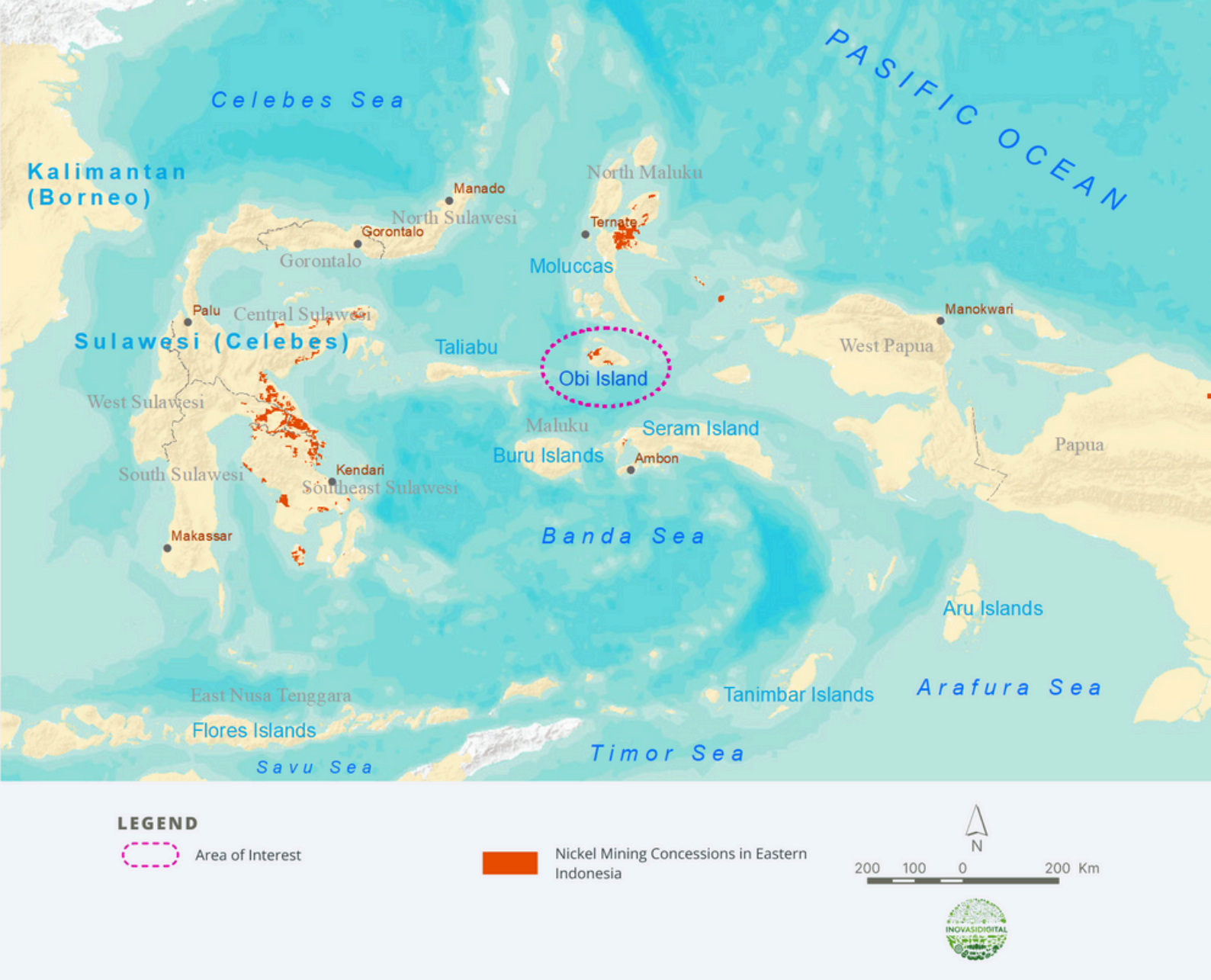
Example of Primary Forest as noted in the landscape nature risk assessment

To identify risks and opportunities for safeguarding the natural environment on Obi Island, PT Trimegah Bangun Persada Tbk (TBP) conducted a Landscape Level Nature-Risk Assessment (LRNA) in partnership with PT Inovasi Digital untuk Transformasi (PTID), the consultancy arm of Earthqualizer Foundation.

The extensive study, perhaps the first of its kind in the Indonesian mining industries, identified 16 distinct nature-risks that require proactive management. A follow up study identifies options to compensate for future mining-related land use impact. TBP is incorporating these findings into its expansion planning with the goal of achieving terrestrial conservation net gain by 2043.

“Landscape-scale assessments facilitate integrated planning and management by bringing together different stakeholders and sectors, leading to more holistic and sustainable solutions”

- Steven Brown



PRE OPERATIONAL HISTORY

Between 2009 and 2023, only a minor area of natural forest on Obi Island was cleared for mining-related land disturbance (approximately 400 ha out of a total land disturbance of approximately 4,136 ha). This was due to the land fires of 2002-03 in the western part of the island, which had a devastating impact on forest cover before mining commenced.

A review of Harita Nickel's past mining-related activities on Obi Island shows the company respects the boundaries of other land users, such as forestry companies and communities. In the past 15 years, its mining operations resulted in minimal natural forest loss (~400 ha or 1.4% of Obi Island). This illustrates the company's understanding of the need to operate cautiously when managing nature risk and its commitment to pursue a Responsible Mining scenario.

However, if all legally issued mining-related permits should be fully exploited in the coming decades, then 19% of Obi Island's land surface will be affected. This does not take into account the possibility that new permits may be issued in years to come.

NATURE RISK ASSESSMENT SCOPE



Multiple industrial operations share Obi Island with diverse flora and fauna

Given the fact that the broad range of mining-related activities and their sustainability impacts has already been subject to various detailed Environmental Impact Assessments (EIA), the scope of this nature risk assessment has been set on the wider landscape, terrestrial and marine, with emphasis on sites and concession areas where mining-related activities have yet to take off, including in areas where the intersection of nature and society require careful management.

In terms of source material, we placed heavy emphasis on collecting thematic maps, satellite imagery and used focus group interviews as part of the risk assessment analysis. In some cases, field-based studies were also conducted.

Therefore, the scope of the LNRA extended beyond Harita's operational boundaries to offer an 'island-wide evaluation' of the landscape on Obi Island, located in the South Halmahera region of Maluku. The company plans to use the study as part of a wider engagement strategy to collaborate with other stakeholders on Obi Island to implement conservation projects.

"With this island-wide study, Harita Nickel acknowledges that mining related impacts do not stop at arbitrary borders."

- Steven Brown

SCENARIOS AND LANDSCAPES

As part of its assessment, PTID compared a “responsible mining” scenario with a “worst practice” scenario and assessed the size of potentially deforested areas and associated carbon emissions under both scenarios. Additionally, the assessment identified key risk areas across the island to guide the responsible expansion of TBP’s operations in line with the “responsible mining” scenario and contribute to the long-term conservation of biodiversity across the island with an integrated approach to land-use planning.



The archipelagic Halmahera Region

TBP’s commitment to “responsible mining” requires the company to continue engaging its numerous stakeholders – joint venture partners, suppliers, government agencies, local communities, NGOs, as well as its investors and downstream customers – for support to enable its implementation.

Regular public disclosure of the company’s efforts regarding nature risks encountered and their management is a critically important tool in stakeholder engagement. For this purpose, the LNRA report includes a range of recommendations for mitigation of nature risks, as well as recommended disclosures.

RISK ASSESSMENT METHODOLOGY

The LNRA risk assessment aligns with the main components of the Taskforce for Nature-related Disclosures (TNFD)'s "Locate, Evaluate, Assess, and Prepare" (LEAP) approach. The guidelines of the "[Guidance on the identification and assessment of nature-related issues: The LEAP approach](#)" were reviewed, and relevant aspects of the four realms of nature (land, ocean, freshwater), atmosphere), and society (including local communities) were assessed during the LNRA process.



Endemic species being grown for -post mining rehabilitation

Assessment of physical acute and chronic risks (as defined by LEAP guidance) were prioritized. This identification and management will allow mitigation of transition and systemic risks in the future. For the assessment of environmental risks, relevant spatial maps were overlaid to identify critical risk areas.

"This is the first comprehensive nature study conducted by any Indonesian nickel producer. Undertaken at the company's own initiative, it illustrates a commitment to go beyond regulatory requirements".

- Steven Brown

MULTI LAYERED DATA SOURCES



Google Earth 2025, Obi Island

Mapping layers included mining and logging concessions, land status/use types and vegetation cover, community land use, satellite imagery dating back to 1984, Key Biodiversity Areas, terrestrial landscape and marine seascapes, particularly corals. Mapping data was sourced from government agencies, NGOs, academic studies, and TBP. Additionally, the PTID team identified areas with high forest density and marked them as relevant areas for further assessment.

To address social aspects, the LNRA identified risks related to environmental human rights. For this process, PTID utilized its proprietary assessment framework based on its extensive experience of developing environment-based community rights solutions. Current and historic community land uses were assessed, and critical areas for community livelihoods were identified. Additionally, secondary risks from mining to communities, such as runoff from potential mining activities uphill from communities were considered.

The assessment compares a "responsible mining" scenario with a "worst practice" scenario, which demonstrates the potential benefits of adopting more sustainable practices. This is a powerful tool to gather stakeholder support for a more responsible approach. - Steven Brown

STAKEHOLDER ENGAGEMENT METHODOLOGY



Ten village communities on Obi Island took part in focus groups

For both environmental and human rights aspects, PTID held focus group discussions to supplement document-based evidence with tacit knowledge of relevant stakeholders. These focus groups included representatives from TBP, government, local communities, and relevant third parties, such as NGOs, and covered mining permitting and practices, community history, as well as aquatic and terrestrial biodiversity. Nature risks associated with goods and commodities procured from outside Obi Island were not included in the scope of the study. These will be considered in a follow up program in 2025.

“Harita Nickel has shown a commitment to engaging with multiple stakeholders, including joint venture partners, suppliers, government agencies, local communities, NGOs, investors and downstream customers. The inclusion of focus groups with diverse representation is a positive step.”

-Steven Brown

LANDSCAPE ANALYSIS AND DEFINITIONS



The Landscape Assessment considered the nature and climate risks beyond Harita Nickel's operational boundaries

Consistent with TNFD's LEAP guidance, the LNRA reviewed the nature and climate impact beyond TBP's operational boundaries, considering how external risks—whether created by the company or others—may impact the company's operations, reputation, and/or financial bottom line. As risks within TBP's operational boundaries have already been subject to various, detailed environmental and social impact assessments (mandated by the Indonesian government, requested by buyers of TBP's products and/or voluntary), the LNRA focused on the wider terrestrial and marine landscape on Obi Island, with emphasis on sites and concession areas where mining-related activities have yet to occur.

Landscapes considered during the study are physical, commercial, administrative, natural and community landscapes. Risks were identified in areas that play a crucial role for local biodiversity or provide critical ecosystem services to communities.

THE PHYSICAL LANDSCAPE

The physical landscape includes geographical and geological aspects, such as climate, rainfall, seismic activity and rock formations. Potential risk areas were identified based on potential natural disasters, topographic features, and terrain types.

THE COMMERCIAL LANDSCAPE

The commercial landscape analysis considered mining and logging concessions, the impact of mining and logging activities on vegetation and topography, as well as sustainability policies and practices of concession holders.

The main potential risk area identified in the commercial landscape is the 30% green space that TBP has committed to preserving in its planned industrial park, surrounding its current operational area.

THE ADMINISTRATIVE LANDSCAPE

The administrative landscape evaluation identified the jurisdictional responsibilities of government bodies on different levels (local, regional, national), administrative boundaries, government-issued land status and land use designations, and current practices in allocating concessions.

Focus was placed on identifying the role and agency of local communities in land-use decision making processes, and on identifying related risks. Additionally, relevant land use types for local livelihood (such as social forestry concessions) were identified.

Potential risk indicators for the administrative landscape include protected areas (nature reserves, protected forest), moratorium areas, as well as social forestry and production forest allocations.

THE NATURAL LANDSCAPE

The natural landscape assessment identified endemic and protected species of Obi Island, their historic development, forest types, and indicative estimates of carbon stock, inland water bodies, and marine ecosystems. Additionally, protected areas and Key Biodiversity Areas were identified.

Indicators for identifying potential risks in the natural landscape include various forest types, connectivity of ecosystems, Key Biodiversity Areas, as well as water bodies and marine ecosystem, including appropriate buffer areas.

THE COMMUNITY LANDSCAPE

The community landscape evaluation considered the history of human habitation, ethnic groups, cultural heritage sites, and sites of archaeological value. Further community land uses, including agroforests, village land and farmland were identified, which included a detailed identification of types of community plantations.

Potential risk areas related to the community landscape were identified based on village land areas (including buffer areas), sites of historic, cultural and archaeological value, and critical areas for local livelihoods, such as agroforest and farmland.

DEPENDENCIES AND SCENARIO ANALYSIS



One of Obi Island's feathered stakeholders

Additionally, PTID identified dependencies of mining activities that may result in landscape-related risks. Examples of such dependencies are natural resources and areas required for mining-related activities, and changes in the local social structure as a result of mining and mining-related activities.

Based on these landscape-related and dependency considerations, the LNRA resulted in a map identifying high risk areas for mining activities on Obi Island. PTID assumed a “responsible mining” scenario where only areas not identified as high risk would be cleared. This was compared with a “worst identifiable practice” scenario, where all areas in existing concessions would be cleared. Forest loss and carbon emissions were estimated in both scenarios.

The reviewer recommends the company update its SOPs, particularly those related to land acquisition, surveys, community relations, land clearing and rehabilitation, to ensure that the LNRA findings and recommendations are properly considered.

- Steven Brown

RECOMMENDATIONS AND COMPENSATION OPTIONS

The LNRA followed the LEAP guidance mitigation hierarchy principles that are based on the SBTN AR3T framework, which prioritizes avoidance and minimization of nature impacts over compensatory measures:

The identification of high-risk areas enables TBP to avoid or minimize negative impacts on nature. For this purpose, the LNRA developed detailed recommendations for TBP on how to manage identified material risks in a “responsible mining” scenario, and recommendations for relevant risk management-related disclosures.

To compensate for nature-related risks that still exist under a “responsible mining” scenario, regenerative and restoration activities are required, which will further contribute to TBP’s target of net-conservation gain by 2043.

In a follow up to the LNRA, PTID identified several compensation options, which were evaluated together with TBP. Planning for the implementation of these compensation options has already started, and implementation is expected to commence in 2025.

NEXT STEPS

TBP’s management has taken note of the nature risks identified by the study. In line with its Sustainability Policy, the company reaffirms its commitment to uphold the Responsible Mining scenario. Accordingly, these are the next steps:

- Relevant departments are incorporating the LNRA findings in updates to the company’s Standard Operating Procedures (SOP) such as those concerning land acquisition, surveys and community relations to ensure that the findings and recommendations of the LRNA are properly taken into account.

The company sees the LRNA as a work-in-progress rather than a one-off exercise. Therefore, decisions to undertake mining-related activities in go with care areas will be based on additional risk assessment. These could include field-level verifications of primary forest, detailed studies into slope stability, limestone classifications and shipping routes that could affect coral reefs.

The results of these studies will be incorporated in an LRNA update on a regular basis. In line with the LRNA recommendations, the company will begin disclosing how it addresses key nature risks in its annual Sustainability Report.

“Aligning the LNRA with the Taskforce for Nature-related Financial Disclosures (TNFD)’s LEAP approach demonstrates a commitment to following international best practices.”

- Steven Brown

HARITA NICKEL'S COMMITMENTS



International Environment Day saw the Harita Nickel team diving off the coast of Obi Island

In 2025, PT TBP will furthermore commission regular remote monitoring of land use changes on Obi Island. This is done to assure that company management instructions are complied with and that deforestation alerts detected by third parties are known to the company.

In line with its Sustainability Policy, the company will furthermore commence a third-party supplier engagement program in 2025, which includes a baseline nature risk assessment.

In addition to meeting Indonesian binding requirements for land rehabilitation and in line with its Sustainability Policy, the company will proceed to develop a viable, materially relevant biodiversity compensation program.

“Our sustainability policy states a target for net conservation gain by 2043 and a commitment to preserve 30% green space in the industrial park”
- Harita Nickel

ACKNOWLEDGEMENTS

Harita Nickel acknowledges the importance of preserving and responsibly managing Obi Island's unique landscapes. We express our sincere gratitude to the teams at PTID and Earthqualizer Foundation for their invaluable expertise and contributions. We also recognize the dozens of research studies that informed this work, as well as the advancements in satellite technology and spatial analysis, which have enabled us to conduct such a detailed and comprehensive assessment.



Figure 5. Sketch of Obi Island of the Late 17th Century

Source: [Atlas of Mutual Heritage](#)

This LNRA marks a significant step in our commitment to responsible mining and biodiversity conservation. As we move forward, Harita Nickel will continue to collaborate with stakeholders, refine our strategies, and prioritize the protection of Obi Island's natural and social landscapes for future generations.

Sustainability is built on an understanding of the past and a commitment to the future. To us, responsible mining means managing resources with care, minimizing environmental impact, and ensuring that economic development supports long-term ecological resilience and community well-being.

TERMS AND DEFINITIONS

"Business-as-Usual" (scenario)	Mining-related operations based on the absolute legal minimum, with minimal external monitoring and law enforcement.
"Go-with-Care"	Spatial area where activities by extractive industries are less likely to result in undue environmental damage and/or social resistance, but proactive verification and management of nature risk is still recommended.
Company group	A group of corporate entities consisting of a collection of parent and subsidiary companies that function as a single economic entity through a common source of control.
High Risk	Spatial area where activities by extractive industries are likely to result in undue environmental damage and/or social resistance, unless verified nature risk is explicitly managed to avoid negative impacts.
Primary forest	Forest that has not been previously selectively logged for commercial purposes and/or temporarily converted to other land use since the most practical year that allows remote assessment (1984).
PT PTID	Innovasi Digital untuk Transformasi, the digital arm of the Earthqualizer Foundation
PT TBP	Trimegah Bangun Persada also known as PT TBP.
Regenerating forest	Forest that has been previously selectively logged for commercial purposes and/or temporarily converted to other land use and /or subject to land fires since the most practical year that allows remote assessment (1984).
Responsible Mining (scenario)	Mining-related operations based on the absolute legal minimum and a comprehensive corporate sustainability policy, combined with external monitoring and proactive law enforcement.
TNFD	The Taskforce for Natura Related Financial Disclosure

