

HUMAN RIGHTS POLICY **(the “Policy”)**

1. Our Responsibility to Respect Human Rights

Asia Pulp & Paper (APP) Sinar Mas (hereinafter referred as “APP”) recognizes our responsibility to respect human rights throughout our operations, as established in the International Bill of Human Rights and the principles concerning fundamental rights in the eight ILO core conventions as set out in the ILO Declaration on Fundamental Principles and Rights at Work. We commit to respecting the rights of our worker and the communities surrounding our operations and our other stakeholders in line with the United Nations Guiding Principles on Business and Human Rights.

Our Workers

- 1.1 We adhere to child labour laws, including the ILO’s 1993 Convention on Minimum Age and the 1999 Worst Forms of Child Labour Convention.
- 1.2 We do not tolerate harassment or discrimination in our worker practices, such as gender, ethnicity, religion, race, or disabilities.
- 1.3 We promote diversity, inclusion, and equal opportunity in our workplace. We ensure equal opportunities for all workers, that allows personal and professional development to provide an environment where workers can realize their full potential.
- 1.4 We support women empowerment programs in the workplace and communities.
- 1.5 We respect workers’ rights to form and/or join labour associations conforming to the ILO 1948 Convention on the Freedom of Association and Protection of the Right to Organize. We strive to maintain good communications with our workers directly, or indirectly through their labour associations.
- 1.6 We do not tolerate any form of forced labour in our operations. This explicitly means that no worker shall be forced to pay for a job, no worker shall be indebted due to employment agreements, or coerced to work whether directly hired, hired through an employment agency, or working in outsourced/contracted services.
- 1.7 We comply with applicable work hours, overtime, and benefits based on the prevailing laws and regulations in the jurisdictions where we operate.
- 1.8 We comply with minimum wage laws and regulations in the jurisdictions where we operate.
- 1.9 We implement recognized health and safety systems in our operations.
- 1.10 We provide medical facilities and services for all our workers.
- 1.11 We facilitate continuous improvement of our workers’ skills and knowledge through training as well as supplemental educational opportunities;
- 1.12 We respect our workers’ privacy and will not use their personal information for purposes other than employment-related matters, uphold ethical

behaviors by requiring all workers in accordance with APP's Business Code of Conduct (BCoC) and observe the 10 principles set out in the United Nations Global Compact.

Our Suppliers

1.13 We require our suppliers to respect human rights in line with this Policy. This requirement is set out in APP's Suppliers Code of Conduct (SCoC).

Communities and Indigenous People

1.14 We recognize the importance of the land rights of local communities and indigenous people as established by the government.

1.15 We implement the principle of free, prior and informed consent and stakeholder engagement.

2. Our Approach

APP approach in implementing respect for human rights is guided by the United Nations Guiding Principles on Business and Human Rights (UNGPs):

- 2.1 We communicate this Policy to all workers and relevant external stakeholders and potentially affected groups especially the vulnerable groups through trainings and discussions.
- 2.2 We conduct human rights due diligence to identify, prevent, mitigate and account for human rights risks and impacts across our operation.
- 2.3 Throughout our due diligence process, the organization carries out engagement with potentially affected groups and other relevant stakeholders to help us better identify and address our potential impacts.
- 2.4 We provide or cooperates to provide remediation for human rights impacts that we may have caused or contributed to.
- 2.5 We develop and implement grievance mechanisms that are available to all stakeholders. We do not tolerate retaliation against anyone who raises concerns through the grievance mechanism or participates in the grievance mechanism.
- 2.6 We support the legal process, where relevant, with the aim to remediate the impacts of human rights impacts that we may have caused or contributed to.
- 2.7 We do not tolerate any violence as a mean to settle dispute.

3. Governance

- 3.1 This Policy applies to APP's operations and its suppliers in Indonesia.
- 3.2 The rules applied across our operations are derived from the provisions in this Policy.
- 3.3 This Policy will be reviewed on a regular basis for relevance and its effectiveness to achieve business objectives. To ensure the implementation of this Policy, we conduct regular monitoring and evaluation of its progress.

- 3.4 Sustainability and Stakeholder Engagement Division is appointed to coordinate the day-to-day implementation of APP's human rights programs in line with this Policy. APP¹ regularly reviews the progress on the implementation of this Policy.
- 3.5 We report the progress on the implementation of this Policy to our stakeholders in variety ways that include publications, stakeholder forums and webinars.

This Policy is to further elaborate APP's commitment on respecting human rights throughout its' operations as stated in the APP's Sustainability Commitment.

This Policy supersedes APP's Employee Welfare Policy of 2012.

¹ As referred to APP's Governance Policy