
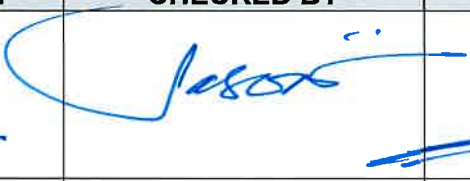







PT MERDEKA COPPER GOLD, Tbk.

STANDARD OPERATING PROCEDURE
HANDLING ACTS OF HARASSMENT AND BULLYING
SOP-IR-03-00

PREPARED BY	CHECKED BY	APPROVED BY	
			
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1. GENERAL

Procedures regarding the Handling of Harassment and/or Bullying is developed, implemented, and managed for the benefit of PT Merdeka Copper Gold, Tbk. and its subsidiaries to regulate the management process in the event of harassment and/or bullying within the Company.

2. PURPOSES

The purpose of this procedure is as an implementation guideline regarding procedures for reporting, handling, and imposing sanctions in the event of acts of harassment and/or bullying within the Company to help create a positive work environment and similar incidents will not be repeated in the future.

3. SCOPE

This procedure applies to all employees at PT Merdeka Copper Gold, Tbk. and its subsidiaries.

4. RESPONSIBILITY

4.1 Top Management

The Top Management must approve and sign all documents including Company Policies, Procedures, Work Instructions, Forms and other documents.

4.2 Management Representative

The HR department must cooperate with other departments to prepare and revise all documents including Company Policies, Procedures, Work Instructions, Forms and other documents.

4.3 Head of Department or Department Manager


The Department Head or Department Manager must review the relevant documented information and ensure that subordinate staff are aware of any changes or updates to the document.

5. PROCEDURE

5.1 Definition

1. The company is PT Merdeka Copper Gold, Tbk. or its subsidiaries.
2. Employees are people who work at PT Merdeka Copper Gold, Tbk. or its subsidiaries.

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3. Trade Union/Labor Union is a Trade Union/Labor Union established by the Employees at PT Merdeka Copper Gold, Tbk. or its subsidiaries in accordance with the prevailing laws and regulations.
4. A member of a Trade Union/Labour Union is a Employee who declares himself/herself in writing to be a member of a Trade Union/Labour Union.
5. The management of a trade union/labor union is a member of a trade union/labor union who is elected or appointed by a member of a trade union/labor union to run or manage the organizational wheels of a trade union/labor union.
6. Company Policy is any policy or rule decided by management. Management has the right to change its policies from time to time.
7. Direct superiors are those who because of their position are appointed by the entrepreneur or the head of the company, among others to lead and supervise several Employees who are their responsibility.
8. Head of Department is the person who leads the department, is responsible for managing, supervising, motivating and directing employees to achieve the Company's goals.
9. Management is people who have the duty to lead and manage the running of the Company or who are authorized to take action on behalf of the Company.
10. Mediators are parties who have a certificate of mediator as a neutral party who assists the parties in the process of resolving a problem in order to find various possible solutions to problems without resorting to breaking or imposing a solution.
11. Harassment and/or Bullying is an act or behavior with a bad intention to one or more people which can cause the target of the act or behavior to feel harassed, offended, humiliated, and intimidated.

5.2 General Terms

1. All behaviors and actions that occur can certainly affect and determine the state of the Company's work environment.
2. A positive work environment can also be created if the Company and every employee respect and respect each other based on the Company's values without any acts of Harassment and/or Bullying.
3. The company is committed to creating a positive work environment and will not tolerate any acts of harassment and/or bullying that occur.
4. Acts of Harassment and/or Bullying in question include but are not limited to; actions taken, words conveyed, either verbally, photos, pictures, social media,

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and various other forms, as well as sounds made, body movements and sign language.


5. Any party who experiences or knows of an act of Harassment and/or Bullying can immediately report the matter according to the mechanism established by the Company.

5.3 Grievances/Reporting of Harassment and/or Bullying

1. Employees who experience or are aware of acts of Harassment and/or Bullying may not want to file a grievance regarding this matter and choose to be resolved personally, but for the sake of creating a positive work environment and so that it does not happen again in the future, every Employee who experiences or knows the occurrence of acts of Harassment and/or Bullying can immediately complain/report it by attaching the required evidence.
2. Grievances/reports submitted in good faith and without the intention of taking advantage of any party.
3. Grievances/reports can be made through the mechanism for submitting grievance s as specified in the procedure SOP-IR-01-00 Submission and Settlement of Employee Grievances.
4. If the grievance/report due to certain reasons is not possible through the mechanism as referred to in number 3 (three) above, then the grievance /report can be made through the mechanism as determined by the Management, in this case referring to the related Company Policy on Whistleblowing System 2020 edition.

5.4 Whistleblower Protection

1. The Company is committed to providing protection to every Employee who makes a grievance /report on any acts of Harassment and/or Bullying that occur.
2. If necessary and deemed necessary, the Company may appoint a third party or the authorized party to take a security measure or other necessary action as a form of protection for the Whistleblower.
3. The Company prohibits any party from taking retaliatory action or any action against the Whistleblower in order to interfere with or influence the grievance /report.

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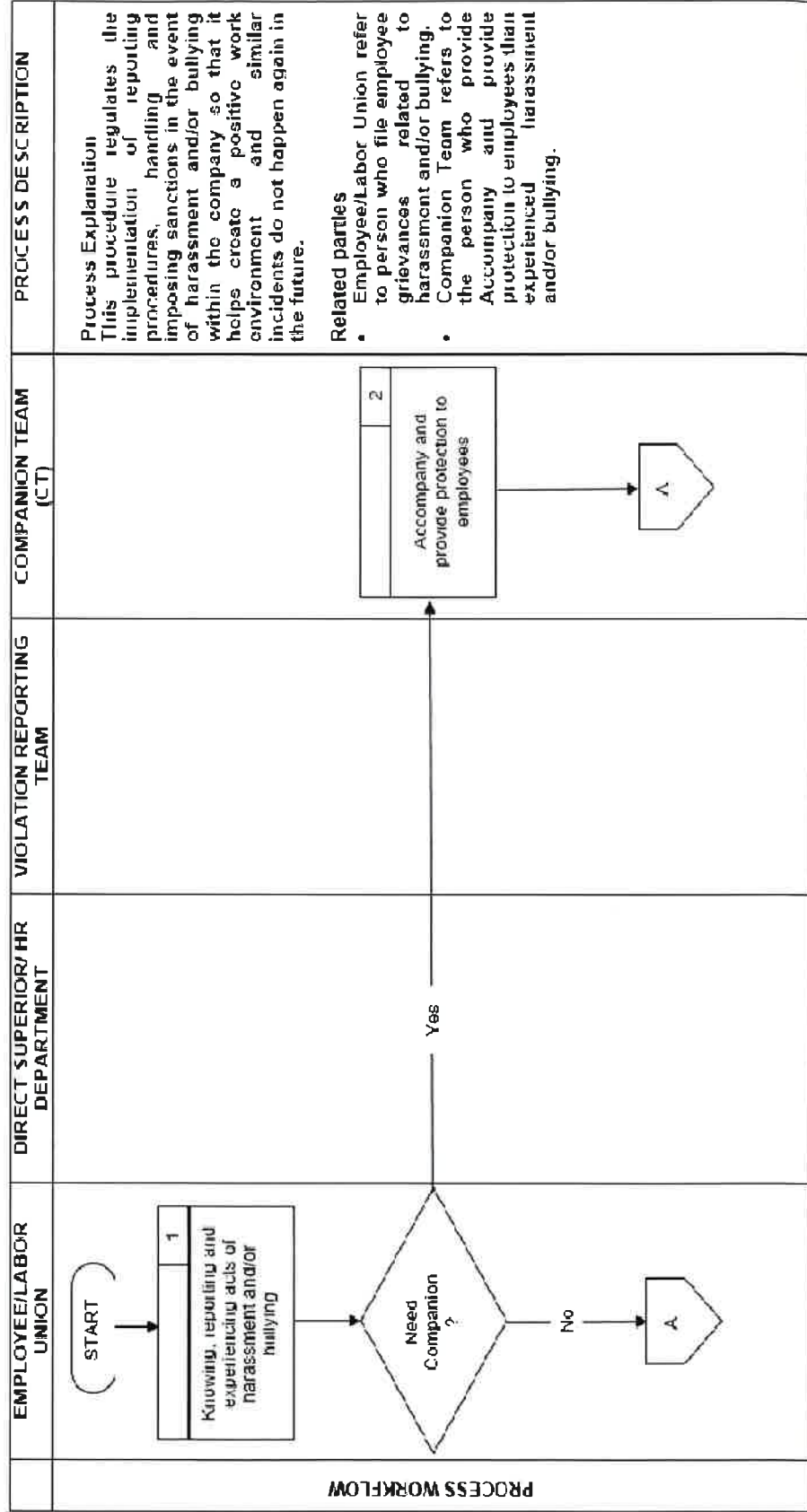
5.5 Handling of Harassment and/or Bullying

1. Every grievance /report submitted will be processed and handled in a professional, impartial, objective, neutral, and prudent manner.
2. In the event that the grievance /report is made through the grievance submission mechanism, then the Direct Supervisor or Head of the Department or HRD Department can facilitate the settlement through mediation.
3. In the event that the grievance/report is made through a mechanism that refers to the Company's Policy regarding the Violation Reporting System, the Violation Reporting Team can facilitate settlement through mediation.
4. The Company may appoint a Mediator from an external party (external) to handle grievances/reports, either through a grievance submission mechanism or through a mechanism that refers to the Company's Policy regarding the Violation Reporting System.
5. If deemed necessary, the Company may determine the handling of grievances/reports of Harassment and/or Bullying that occurs by involving third parties in accordance with the applicable laws and regulations.
6. If the targeted Employee is a Member of a Trade Union, the process of handling the Harassment and/or Bullying experienced can be accompanied by the Management of the Trade Union.

5.6 Sanctions for Harassment and/or Bullying

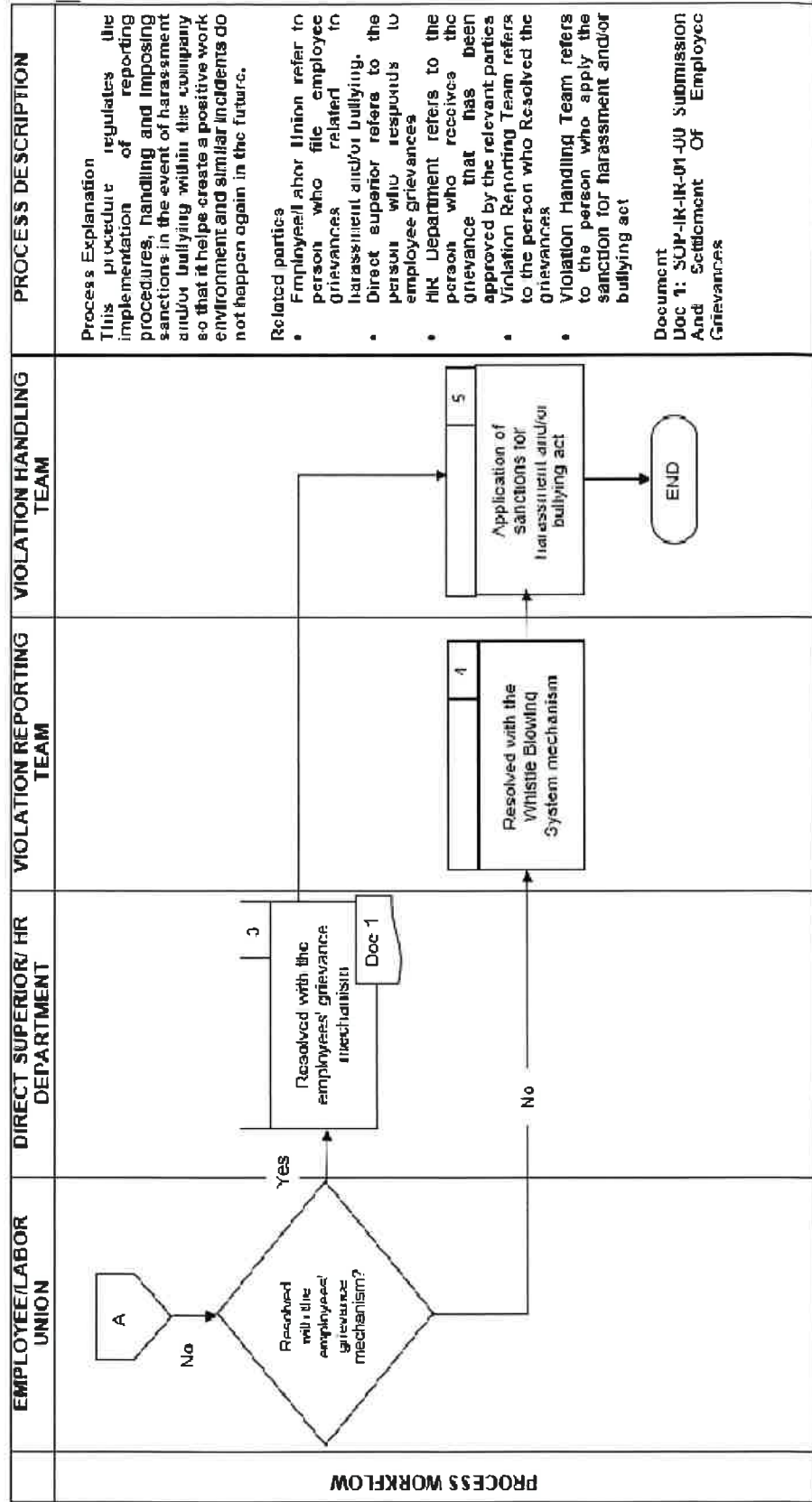
1. The Company will take firm action against any acts of Harassment and/or Bullying that occur by imposing sanctions.
2. The sanction as referred to in number 1 (one) above will be given by taking into account:
 - a. Employment Agreement, or
 - b. Company Regulations or Collective Labor Agreements, or
 - c. The applicable laws and regulations.
3. In the event that the grievance /report is submitted without good faith or after an examination of the grievance /report has an intention to take certain advantages, the complainant may also be given a sanction by referring to point 2 (two) above.

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6. ANNEXES

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