

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

PT. APP Purinusa Ekapersada (hereinafter referred as “APP, Our and We”) recognizes our responsibility to respecting 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 workers and the communities surrounding our operations and other stakeholders including the Human Rights Defenders (HRDs) in line with the United Nations Guiding Principles on Business and Human Rights.

1. Our Responsibility to Respecting Human Rights

1.1. Our Workers

- 1.1.1 We adhere to child labour laws, including the ILO’s 1993 Convention on Minimum Age and the 1999 Worst Forms of Child Labour Convention.
- 1.1.2 We do not tolerate harassment or discrimination in our work practices, such as gender, ethnicity, religion, race, or disabilities.
- 1.1.3 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.
- 1.1.4 We support women empowerment programs in the workplace and communities.
- 1.1.5 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.
- 1.1.6 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.
- 1.1.7 We comply with applicable work hours, overtime, and benefits based on the prevailing laws and regulations in the jurisdictions where we operate.
- 1.1.8 We uphold the right of all workers to a decent standard of living by aligning compensation with living wage principles, complying with minimum wage laws in all jurisdictions where we operate, and supporting employee well-being through fair pay and benefits.
- 1.1.9 We implement recognized health and safety systems in our operations.
- 1.1.10 We provide medical facilities and services for all our workers.
- 1.1.11 We facilitate continuous improvement of our workers’ skills and knowledge through training as well as supplemental educational opportunities.
- 1.1.12 We respect our workers’ privacy and will not use their personal information for purposes other than employment-related matters, uphold ethical behaviours with workers in accordance with APP’s Business Code of Conduct (BCoC) and observe the 10 principles set out in the

United Nations Global Compact.

- 1.1.13 We support our workers to have freedom to come and go freely from their residences and appropriate freedom to leave the workstation for specific purposes in line with the company policy.

1.2 Our Suppliers

- 1.2.1 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).

1.3 Communities and Indigenous People

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

1.4 Human Rights Defenders

- 1.4.1 We do not tolerate abuse, threats, harassment, intimidation, the use of violence, physical or legal attacks, or reprisals against human rights defenders.

2. Our Approach

2.1. Transparency and Engagement

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

- 2.1.1. We communicate this Policy to all workers and relevant external stakeholders and potentially affected groups especially the vulnerable groups through trainings and discussions.
- 2.1.2. We conduct human rights due diligence to identify, prevent, mitigate and account for human rights risks and impacts across our operation including adverse impact to HRDs.
- 2.1.3. 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.
- 2.1.4. We identify our salient human rights priorities based on relevance to our company purpose, key categories and markets; the scale and severity of the potential human rights risk; and our ability to make a difference.
- 2.1.5. We respect and adhere to the remediation for human rights impacts (harm) that we may have caused or contributed including in the past.
- 2.1.6. We develop and implement grievance mechanisms that are available to all stakeholders including HRDs. We do not tolerate retaliation against anyone who raises concerns through the grievance mechanism or participates in the grievance mechanism.
- 2.1.7. We do not tolerate any violence as a mean to settle dispute.
- 2.1.8. We commit to adhere with national and international regulation, and industry benchmark standards, whichever is higher, in APP's operations.

2.2. Free, Prior and Informed Consent (FPIC)

APP recognizes our responsibility to respect human rights throughout our

operations, by protecting legal and/or customary rights of ownership, use and management of land, territories and resources affected by our activities. In respecting the rights of the communities surrounding our operations, we commit to implementing FPIC principles in line with The Indigenous and Tribal Peoples Convention, 1989 (No. 169) and The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), 2007.

- 2.2.1. We uphold the right to the FPIC principles for local communities and indigenous peoples when they are identified as an affected rights holder due to their legal and/or customary rights being affected by our activities.
- 2.2.2. We commit to adhering to the principles of FPIC, aligning with national and international regulations, and/or industry best practice.
- 2.2.3. We engage in culturally appropriate manner when engaging with rights holder when assessing impacts on environmental values such as landscape and high conservation values (HCVs) that include cultural and spiritual values.
- 2.2.4. We engage with stakeholders, (i.e. legal and/or customary rights stakeholders, etc.), in the design and implementation of management and monitoring plans.
- 2.2.5. We commit to building good and mutually beneficial relationships with a legal and/or customary rights stakeholder in and surrounding APP's operations.
- 2.2.6. We implement FPIC with good faith and informed engagement processes with all affected persons, including women and those particularly vulnerable, with full respect for human rights.

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 Division is appointed to coordinate the day-to-day implementation of APP's human rights programs in line with this Policy.
- 3.5 We report the progress on the implementation of this Policy to our stakeholders in diverse medium that includes 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 Human Rights Policy of 2022.

Last updated: Jakarta, 7 July 2025.

APPENDIX

REFERENCE

REGULATION (LAW)

The Republic of Indonesia Law Number 39 Year 1999 concerning Human Rights;
The Republic of Indonesia Law Number 13 Year 2003 concerning Manpower;
The Republic of Indonesia Law Number 6 Year 2023 concerning the Stipulation of Government Regulation in Lieu of Law Number 2 of 2022 concerning Job Creation into Law.

STANDARD

International Bill of Human Rights:
Universal Declaration of Human Rights;
United Nations (UN) Declaration on Human Rights Defenders;
International Covenant on Civil and Political Rights and International Covenant on Economic, Social and Cultural Rights;
United Nations Guiding Principles on Business and Human Rights (UNGPs on BHR)
ILO Declaration on Fundamental Principles and Rights at Work;
Indigenous and Tribal Peoples Convention, 1989 (No. 169);
The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), 2007;
The Accountability Framework Initiative, 2024;
FSC Guidelines for the Implementation of Free, Prior and Informed Consent, 2021.

DEFINITION

Discrimination

Any distinction, exclusion, or preference made on the basis of race, colour, sex, religion, political opinion, national extraction, or social origin (among other characteristics), which has the effect of nullifying or impairing equality of opportunity and treatment in employment or occupation.

Remediation

Terms used interchangeably or in combination with one another to refer to both the process of providing redress for a negative impact and the substantive outcomes that can counteract, or make good, the negative impact. These outcomes may take a range of forms such as apologies, restitution, rehabilitation, restoration, financial or non-financial compensation, and punitive sanctions (whether criminal or administrative, such as fines), as well as the prevention of harm through, for example, injunctions or guarantees of non-repetition.

Indigenous People

Distinct groups of people who satisfy any of the more commonly accepted definitions of Indigenous Peoples, which consider (among other factors) whether the collective:

- has pursued its own concept and way of human development in a given socioeconomic, political, and historical context;
- has tried to maintain its distinct group identity, languages, traditional beliefs, customs, laws and institutions, worldviews, and ways of life;
- has at one time exercised control and management of the lands, natural resources, and territories that it has historically used and occupied, with which it has a special connection, and upon which its physical and cultural survival typically depends;
- self-identifies as Indigenous Peoples; and/or
- descends from populations whose existence pre-dates the colonisation of the lands within which it was originally found or of which it was then dispossessed.

When considering the factors above, no single one shall be determinative. Indigenous Peoples are defined as such regardless of the local, national, and regional terms that may be applied to them, such as 'tribal people,' 'first peoples,' 'secluded tribes,' 'hill people,' or others.

Human Rights Defender (HRD)

Any person acting individually or in a group or as a community including local communities in a peaceful and fair manner, to protect and promote human rights relating to the local, indigenous and traditional communities.