

WORKING HOURS POLICY

(the “Policy”)

1. Our Responsibility to Protect Workers Regarding Working Hours

PT. Indah Kiat Pulp & Paper Tbk (hereinafter referred to as the “Company”) is committed to doing business with integrity in the long term, including a commitment to protecting workers regarding the working hours. This commitment is in accordance with applicable labor laws and regulations in the areas where we operate and in line with the Company's Human Rights Policy. To achieve this goal:

- 1.1 We apply regular working hours of maximum 8 (eight) hours per day and 40 (forty) hours per week with 1 (one) hour break time per day.
- 1.2 We apply shift work in some production areas with at least half an hour break time after working 4 (four) hours continuously.
- 1.3 We apply at least 1 (one) day off in every 7 (seven) working days period.
- 1.4 We implement report attendance using available attendance mechanism.
- 1.5 We apply for the workers who work more than 40 (forty) hours per week or working on holidays will be counted as overtime. Overtime is applied with prior consent of the workers. Overtime wages/premium applied in accordance with applicable laws and regulations.

2. Our approach

The approach we use to meet our goals:

- 2.1 We communicate this Policy to all workers in the Company's operational areas.
- 2.2 We enforce this policy without any discrimination and guarantee that all workers receive the same treatment/rights in accordance with available procedures.
- 2.3 We develop and implement a grievance redress mechanism that is available to all workers. We do not tolerate retaliation against anyone who raises a concern through the grievance mechanism or participates in the grievance mechanism.

3. Governance

- 3.1 This Policy applies to the Company's operations and 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.
- 3.3 Human Resources function is appointed to coordinate the day-to-day implementation of the Company's workers protection program on working hours

in line with this Policy. The Company¹ regularly reviews the progress on the implementation of this Policy.

3.4 We report the progress on the implementation of this Policy to our stakeholders in a variety of ways.

This Policy is to further explain the Company's commitment to protect workers throughout its operations as stated in the Company's Sustainability Commitment.

Jakarta, 31 May 2023

¹ As referred to the Company's Governance Policy

REFERENCE

REGULATION (LAW)

Law of the Republic of Indonesia concerning Manpower

Law of the Republic of Indonesia Number 11 of 2020 concerning Job Creation