

## **HUMAN RIGHTS, CHILD LABOUR, DISABILITY AND SEXUAL HARASSMENT POLICY (“Policy”) PT Elang Mahkota Teknologi Tbk (“Company”)**

### **1. Statement**

This Policy is prepared in accordance with the Company's business processes and refers to regulations and standards related to human rights, both nationally and internationally. This Policy is a big umbrella that covers human rights, child labour, disability and sexual harassment aspects, including those related to workers/employees, vendors, business partners, and society in general. The implementation of this Policy will be carried out in stages, effectively, and efficiently in accordance with the availability of resources, needs, and the level of urgency of each aspect listed in this Policy.

### **2. Introduction**

The Company runs business in services (professional activities, media services, solutions, information technology, connectivity, healthcare, banking services) and trading through the Company's subsidiaries. In running a sustainable business, the Company understands the importance of respect for human rights, child labour, disability and sexual harassment as a form of Corporate Social Responsibility. The Company is committed to paying attention to the impact of the Company's business on human rights, child labour, disability, sexual harassment and trying to minimize negative impacts. This Policy is a manifestation of the Company's commitment to human rights. The Policy also forms the basis for various policies, procedures, and operational activities to be in line with the Company's human rights commitments.

### **3. Legal Basis**

The legal basis used as a reference for respecting human rights by the Company includes:

- a. Law Number 39 of 1999 concerning Human Rights;
- b. Law Number 13 of 2003 concerning Manpower;
- c. Law Number 17 of 2016 concerning Stipulation of Government Regulation in Lieu of Law Number 1 of 2016 concerning the Second Amendment to Law Number 23 of 2002 concerning Child Protection into Law;
- d. Law Number 12 Year 2022 concerning Criminal Acts of Sexual Violence;
- e. Law Number 8 Year 2016 concerning Persons with Disabilities;
- f. Government Regulation No. 43 Year 1998 concerning efforts to improve social welfare for persons with disabilities;
- g. Company Employment Agreement;
- h. Company Regulations;
- i. The Company's Good Corporate Governance Guidelines;
- j. Universal Declaration of Human Rights;
- k. United Nations Guiding Principles on Business and Human Rights (UNGPR);
- l. United Nations Global Compact and Children's Rights and Business Principles (CRBP);
- m. Women's Empowerment Principles (WEP);
- n. Declaration of the International Labour Organization on Fundamental Principles and Rights at Work;
- o. OECD Guidelines for Multinational Enterprises;
- p. The International Labour Organization (ILO) Committee of Experts on the Application of Conventions and Recommendations has confirmed that sexual

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harassment is a form of sex discrimination covered by the Discrimination (Employment and Occupation) Convention (No. 111) of 1958. The ILO’s Indigenous and Tribal Peoples Convention (No. 169) also specifically prohibits sexual harassment in the workplace;

- q. United Nation (UN) General Assembly Resolution 48/104 on the Declaration on the Elimination of Violence Against Women defines violence against women to include sexual harassment, which is prohibited at work, in educational institutions, and elsewhere (Art. 2(b)), and encourages development of penal, civil or other administrative sanctions, as well as preventative approaches to eliminate violence against women (Art. 4(d-f));
- r. Various conventions and other relevant provision of laws and regulations related to human rights, child labour, disability and sexual harassment.

#### **4. Policy Applicability**

The scope of this Policy extends to the Company’s sole office located at SCTV Tower, Central Jakarta, Indonesia.

#### **5. Scope and Context of Human Rights, Child Labour, Disability and Sexual Harassment**

The scope and context of the Company's human rights, child labour, disability and sexual harassment are in accordance with the scope of its business operations, which include human rights related to civil and political rights, basic labour rights, human rights related to business, business partners or supply chains, as well as human rights related to community empowerment. Regarding civil and political rights, the Company is committed to ensuring that all employees of the Company have the freedom to take part in social and/or political processes, as regulated in the Corporate Governance Guidelines. In addition, for the Company, employees are an important asset for the Company so that the Company is committed to paying attention to basic labour rights, such as fulfilling employee remuneration and welfare, social protection, career development, non-discriminatory practices in the workplace, gender equality, disability rights, non-sexual harassment and health and safety aspects. In addition, the rights of association and assembly, as well as the right to collective bargaining are also basic labour rights in the Company.

The Company encourages all stakeholders to try to minimize negative impacts on human rights, especially employees and the community. This is a concern for the Company, because the occurrence of incidents or acts of human rights violations can have an impact on the reputation risk of the Company.

Furthermore, the Company pays attention to human rights, child labour, disability and sexual harassment in the scope of relationships with business partners or supply chains. The Company encourages business partners or supply chains to pay attention to human rights, especially those related to labour rights. This is important because often human rights violations will increase the operational risk of partners or supply chains, and subsequently have an impact on their performance risk to produce products and services for the Company. Furthermore, the Company is committed to fulfilling community human rights through community empowerment activities under

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the “*Pundi Amal Peduli Kasih*” Foundation and Indosiar Foundation. Community empowerment activities are one of the approaches and efforts to fulfil human rights aspects, especially in the context of the socio-economic rights of the community. Some of the issues that can be covered in community empowerment are community rights to education, health, economy, and socio-culture.

### **6. Implementation of Policy**

#### **a. General Implementation**

The Company's commitment and policies in respecting human rights, child labour, disability and non-sexual harassment are strategically effective and efficient as follows:

- 1) Improve the understanding of all employees and management of the Company, including the Board of Directors, Board of Commissioners on human rights;
- 2) Conduct periodic human rights assessment or due diligence in accordance with the context of the Company's social and business responsibilities;
- 3) Review and ensure that policies, manuals and procedures comply with human rights regulations, and apply the principles of non-discrimination, gender equality, disability rights and non-sexual harassment in the workplace;
- 4) Avoid direct or indirect involvement in activities or activities that can lead to human rights incidents, such as trafficking in persons, prostitution, and labour smuggling;
- 5) Respond to potential risks and opportunities related to human rights effectively and efficiently;
- 6) Conduct socialization and education regarding the Company's human rights commitments to stakeholders in accordance with their respective contexts and scopes;
- 7) Involve relevant stakeholders in the context of respecting human rights in accordance with their respective contexts and scopes.

#### **b. Implementation towards Employees**

The Company's human rights commitments and policies towards employment include:

- 1) Fulfil the basic rights of workers, such as in terms of wages and remuneration (equal pay for equal work), social protection, occupational health and safety, social security and old age, allowances and assistance;
- 2) Provide wages based on the minimum wages that equal to the Government-set Regional Minimum Wage and may even exceed that minimum wages to meet a living wage;
- 3) Appreciate the working relationship with employees, especially in terms of clarity of employee status, job placement, recruitment of new employees, transfers, rotations, promotions and demotions;
- 4) Respect the right of employees to obtain good health, including providing guarantees for health checks and health care; clear working days and hours, including overtime, shifts and weekend services; as well as opportunities for sick leave, menstrual leave, childbirth, miscarriage, joint leave and annual leave;

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- 5) Provide equal and non-discriminatory opportunities, as well as providing resource development for employees in the aspects of education, training, performance appraisal and employee career development;
- 6) Respect the rights of employees to associate and assemble;
- 7) Ensure that there is no child labour and forced labour in the Company's labour practices;
- 8) Provision of social facilities for all workers, which includes religious facilities, recreational and sports facilities;
- 9) Provide clarity and appropriate compensation in every act of temporary dismissal, termination of employment (PHK) and early retirement;
- 10) Provide facilities for workers to submit and resolve complaints;
- 11) Company is committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment. Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient. Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal;
- 12) Company will operate a zero tolerance for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment, and reported as criminal acts comply to the applicable Law and Regulation;
- 13) All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimised for making such a complaint.

**c. Implementation towards Business Partners or Supply Chains**

The Company's commitments and policies in encouraging business partners or supply chains to respect human rights, child labour, disability and non-sexual harassment, including:

- 1) Developing and implementing policies and procedures that pay attention to human rights, child labour, disability and sexual harassment in the selection and implementation of cooperation with partners or supply chains;
- 2) Encouraging every working partner to provide a statement of compliance regarding the implementation of occupational health and safety (K3), no child labour, and no forced labour;
- 3) Supervising work partners or supply chain to ensure that there are no human rights, child labour, and sexual harassment incidents that could have a significant impact on the Company and other stakeholders;
- 4) Responding to negative impacts that occur in the event of significant human rights, child labour, and sexual harassment incidents committed by partners or supply chains.

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### **d. Implementation towards Community**

The Company's commitments and policies in helping the fulfilment of community human rights, child labour, and sexual harassment, are among others:

- 1) Empowering the community effectively and efficiently as an approach to assisting the fulfilment of the socio-economic rights, and safe environment with non-sexual harassment of the community;
- 2) Paying attention to local wisdom as a form of respect for human rights in community empowerment;
- 3) Supporting government efforts to protect and fulfil children's rights in every action of the Company, including in the empowering the community;
- 4) Striving to establish strong relationships with the local communities in the areas where we operate and contribute to social development by employing local residents and supporting local business;
- 5) Supporting and pay attention to under-privileged groups, including those from deprived backgrounds, having poor social status and with no formal education or qualifications in the employee recruitment process;
- 6) Promoting the taking part in volunteering opportunities by its employees and encourages employees to volunteer for activities in the local community through “*Pundi Amal Peduli Kasih*” Foundation;
- 7) Treating person with disability who meets the job requirements and job qualifications in the Company fairly without bias or discrimination of any kind.

### **e. Concrete Measures towards Policy Implementation**

In order to ensure that all stakeholders of the Company are fully aware on the Company's concern on human rights protection, the Company has conducted or implemented the following actions to cover several aspects related to human rights, namely:

- 1) **To raise awareness of all employees**, the Company conducted training on (i) Anti-Harassment in the Workplace on 2 December 2022 and (ii) Diversity & Inclusivity at Work on 2 December 2022;
- 2) **As a proof that the Company upholds gender equality and woman participation**, (i) each the Board of Commissioners and Board of Directors of the Company has female member and (ii) the availability of a lactation room for female employees;
- 3) **For children protection**, the Company has special policy namely Child Protection Policy;
- 4) **The Company welcomes the participation of migrant workers**, in addition to its emphasis on recruiting Indonesian human resources. This commitment is evident in the composition of the Company's Board of Directors, which includes a foreign member; and
- 5) **As a form of contribution to local communities**, the Company has joint prayer activities such as recitation, prayer fellowship, and first Friday mass that can be attended by all parties, including local communities and employees of other companies located in the area near the Company's office.

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**7. Monitoring and Evaluation**

The implementation of this Policy is coordinated, monitored and evaluated by the Environmental, Social and Governance Committee (“**ESG Committee**”) annually and reported to the Board of Directors, Board of Commissioners and all stakeholders of the Company in the Company's Sustainability Report. Company can ask external independent parties to conduct an objective assessment or due diligence of human rights, child labour, disability, and sexual harassment performance in accordance with certain standards.

**Internal Assessment**

In accordance with the Employee Grievance Procedure Policy, Human Resources Division (“**HRD**”) is a department within the Company that will receive and handle any complaints, problems, and/or related to the work performed by an employee, and therefore the employee may file an official complaint about deviation of this Policy, unjust treatment, harassment, and/or health and safety concerns in the workplace. Furthermore, HRD as a department that is responsible for the recruitment process, shall ensure to uphold the implementation of this Policy during such recruitment procedure.

The ESG Committee performs an assessment annually on HRD to determine among others, whether the handling of the grievance report and the recruitment process have been implemented in accordance with the relevant policies and procedures, and to provide rectification actions, as necessary, for any discrepancy found during such assessment.

**External Assessment**

The Company not only identifies risks by conducting assessment or due diligence of the implementation of human rights, child labour, disability, and sexual harassment performance internally, but also externally to suppliers, business partners, and other third parties in carrying out the Company's business activities, such as in the supply chain process and corporate business actions such as mergers, acquisitions, and consolidation. The examination in the supply chain process can be seen further in Supplier Selection Creditors Protection Policy. The Company conducts due diligence to external parties involved in its business activities by asking questions related to various human rights aspects as referred to in the Supplier Selection Creditors Protection Policy.

**Further Action on Assessment**

As a result of the assessment, the Company conducts regular reviews of potential issues that may arise from human rights violations that are identified in the risk mapping.

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### **Prevention and Remedies**

The Company's efforts to prevent human rights violations are implemented through the following preventive measures:

- 1) Conduct an assessment of this Policy implementation to internal and external parties such as suppliers, business partners, and other third parties;
- 2) Implement the commitment on this Policy and ensure that they are applied and communicated to all employees, stakeholders, and third parties by providing human rights-related training to all employees, stakeholders, and third parties;
- 3) Monitor and evaluate the effectiveness of this Policy to identify parts for improvement; and
- 4) Provide remediation or improvement to those affected by human rights violations and take action to prevent similar harm from occurring in the future.

The implementation of the above preventive measures requires the commitment, cooperation, and involvement of employees and the Company. With the implementation of these preventive measures, it is expected that the Company can help prevent human rights violations against employees throughout the Company's workplace.

Despite the prevention efforts by the Company, if violations of this Policy still occur, the Company will implement the following measures:

- 1) Conduct an investigation to determine the violation that occurred and identify those who responsible;
- 2) The Company takes appropriate and firm action to impose sanctions on those who commit violations;
- 3) Take and implement steps to prevent similar violations from occurring in the future by implementing new policies and procedures and providing additional training to stakeholders; and
- 4) Provide necessary support to individuals or party affected, among others access to healthcare services.

### **8. Evaluation of Policy**

This implementation of this Policy is evaluated and, if necessary, revised in accordance with the development of human rights aspects and the Company's business context. In order to be implemented effectively, the Company discloses this Policy to the stakeholders, namely: shareholders, Board of Commissioners, Board of Directors, management, employees, investors, regulators, business partners, supplier/ sourcing, media, and related communities.

### **9. Closing**

Further information on this Policy and its implementation can be obtained through the ESG Committee. If there is a violation or potential violation in the implementation of this Policy, the parties can report it through the Company's grievance system.