




**PT MERDEKA COPPER GOLD, Tbk.**

**STANDARD OPERATING PROCEDURE**  
**HANDLING ACTS OF HARASSMENT**  
**AND/OR BULLYING**  
**MCG-SOP-IR-03-01**

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01 June 2023	01 June 2023	01 June 2023	01 June 2023	01 June 2023

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	<b>HANDLING ACTS OF HARASSMENT AND/OR BULLYING</b>	Effective date	01 June 2023
		Revision to	01
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## DOCUMENT CHANGE STATUS

No. Revision	Division/Department	Reason For Change	Revision By	Revision Date
01	HR – Industrial Relations	<p>1. Addition and revision to number 1. General to: Suppose, in the course of implementation, non-conformities are found that are not covered in this document and are considered important for one reason or another. In that case, the non-conformities will be further reviewed, and if they are to continue to be applied, they will be made into an addendum to this procedure.</p> <p>And suppose there is a difference in interpretation between this procedure's Indonesian and English versions. In that case, the Indonesian version is the prevailing version. It will be used, and in the event of a request for Discretion on implementing this procedure, it must obtain prior approval from the President Director.</p>	HR Compliance	01 June 2023
01	HR– Industrial Relations	<p>Revise and remove the term in point 5.1 Definition, as follows:</p> <p>1. Trade/Labor Union is a Trade/Labor Union established by the Employee at PT Merdeka Copper Gold, Tbk. or its subsidiaries by the applicable laws and regulations.</p> <p>2. Member of a Trade/Labor Union is an Employee who declares themselves in</p>	HR Compliance	01 June 2023

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		writing to be a member of a Trade/Labor Union. 3. Management of Trade/Labor Union is Trade/Labor Union Members who are elected or appointed by Trade/Labor Union Members to run or manage the organizational wheels of a Trade/Labor Union.		
01	HR – Industrial Relations	Revisions and additions to point 5.2 of the General Standard, as follows: The Company is committed, responsible, and fair in submitting and resolving Employee's grievances protected by applicable laws and regulations and international labor standards, specifically The International Labor Organization Declaration on Fundamental Principles and Rights at Work and The Core International Labor Conventions.	HR Compliance	01 June 2023
01	HR – Industrial Relations	Revise and delete point 5.5 Handling Acts of Harassment and/or Bullying number 6 regarding: 6. If the targeted Employee is a Trade Union Member, then the handling process for the Harassment and/or Bullying experienced can be accompanied by the Trade Union Management.	HR Compliance	01 June 2023

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## 1. GENERAL

Procedure regarding the Handling Acts 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.

Suppose, in the course of implementation, non-conformities are found that are not covered in this document and are considered important for one reason or another. In that case, the non-conformities will be further reviewed, and if they are to continue to be applied, they will be made into an addendum to this procedure.

And suppose there is a difference in interpretation between this procedure's Indonesian and English versions. In that case, the Indonesian version is the prevailing version. It will be used, and In the event of a request for Discretion on Implementing this procedure, it must obtain prior approval from the President Director.

## 2. PURPOSE

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 Employee 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, ensure that subordinate staff are aware of any changes or updates to the document.

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## **5. PROCEDURE**

### **5.1 Definition**


1. The company is PT Merdeka Copper Gold, Tbk. or its subsidiaries.
2. Employee is a person who works at PT Merdeka Copper Gold, Tbk. and its subsidiaries.
3. Company Policy is any policy or rule decided by management. Management has the right to change its policies from time to time.
4. Direct supervisor is a person who, because of their position, is appointed by the entrepreneur or the head of the Company, among others, to lead and supervise several Employee who are their responsibility.
5. The Head of Department is the person who leads the department and is responsible for managing, supervising, motivating, and directing Employee to achieve the Company's goals.
6. Management is people who must lead and manage the Company's running or are authorized to take action on behalf of the Company.
7. Mediators are parties with a certificate of mediator as a neutral party who assists the parties in resolving a problem to find possible solutions without resorting to breaking or imposing a solution.
8. Harassment and/or Bullying is an act or behavior with a bad intention to one or more people that can cause the target of the act or behavior to feel harassed, offended, humiliated, and intimidated.

### **5.2 General Standard**

The Company is committed, responsible, and fair in submitting and resolving Employee's grievances protected by applicable laws and regulations and international labor standards, specifically The International Labor Organization Declaration on Fundamental Principles and Rights at Work and The Core International Labor Conventions.

### **5.3 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 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.

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4. Acts of Harassment and/or Bullying in question include but are not limited to actions taken, words conveyed verbally, in photos, pictures, social media, 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.

#### **5.4 Grievances/Reporting of Harassment and/or Bullying**

1. Employee who experiences or is 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 grievances as specified in **the procedure of Submission and Settlement of Employee Grievances**.
4. If the grievances/report due to certain reasons is not possible through the mechanism as referred to in point 5.3 number 3 above, then the grievances /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.

#### **5.5 Whistleblower Protection**

1. The Company is committed to protecting every Employee who makes grievances/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 to protect the Whistleblower.
3. The Company prohibits any party from taking retaliatory action or any action against the Whistleblower to interfere with or influence the grievances /report.

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### **5.6 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. If the grievance /report is made through the grievances submission mechanism, then the Direct Supervisor or Head of the Department or HRD Department can facilitate the settlement through mediation.
3. If the grievances/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 by the applicable Laws and Regulations.

### **5.7 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 considering:
  - a. Employment Agreement; or
  - b. Company Regulations; or
  - c. The applicable Laws and Regulations.
3. If 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 5.6 number 2 above.

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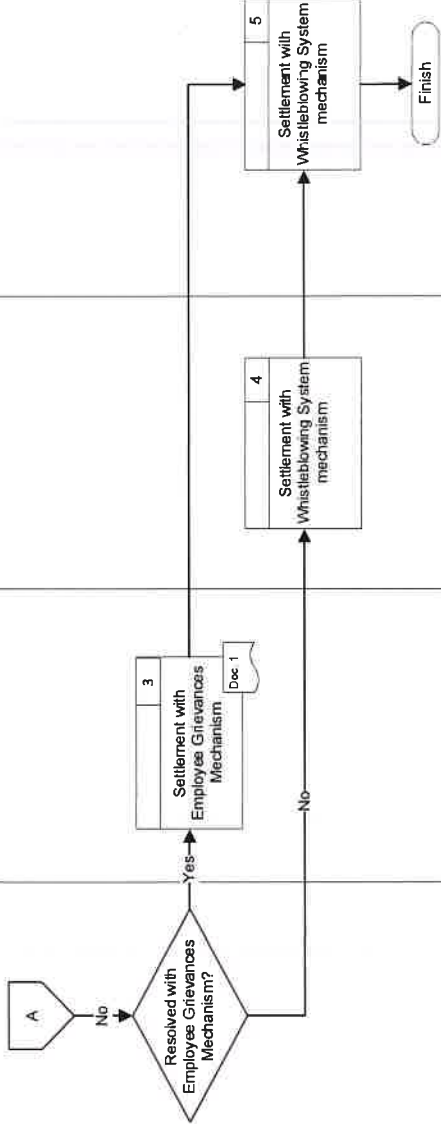
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EMPLOYEE	SUPERVISOR/HR DEPARTMENT	VIOLATION REPORTING TEAM	COMPANION TEAM	PROCESS DESCRIPTION
<p><b>Process Workflow</b></p> <pre> graph TD     Start([Start]) --&gt; 1[1 Knowing, reporting and experiencing acts of harassment and/or bullying]     1 --&gt; Decision{Need assistance?}     Decision -- No --&gt; A1{{A}}     Decision -- Yes --&gt; 2[2 Assist and provide protection for Employee]     2 --&gt; A2{{A}}                     </pre>				<p><b>Process Explanation</b> This procedure regulates the implementation of reporting, handling, and sanctioning procedures in the event of harassment and/or bullying in the Company's environment so as to help create a positive work environment and similar incidents will not recur in the future.</p> <p><b>Related Parties</b></p> <ul style="list-style-type: none"> <li>Employee refers to a person who files an Employee's complaint of harassment and/or bullying.</li> <li>Companion Team refers to a person who provides assistance and protection for Employee who experience acts of harassment and/or bullying.</li> </ul>


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EMPLOYEE/TRADE UNION	SUPERVISOR/HR DEPARTMENT	VIOLATION REPORTING TEAM	VIOLATION HANDLING TEAM	PROCESS DESCRIPTION
 <p style="text-align: center;"><b>Process Workflow</b></p>				
<p><b>Process Explanation</b> This procedure regulates the implementation of reporting, handling, and sanctioning procedures in the event of harassment and/or bullying in the Company's environment so as to help create a positive work environment and similar incidents will not recur in the future.</p> <p><b>Related Parties</b></p> <ul style="list-style-type: none"> <li><b>Employee</b> refers to a person who makes an Employee's grievances of harassment and bullying.</li> <li><b>Direct Supervisor</b> refers to the person who provides a response to the Employee's grievances.</li> <li><b>HR Department</b> refers to the person receiving the Employee Grievances that have been approved by the relevant party.</li> <li><b>Violation Reporting Team</b> refers to the person who resolved the Employee's grievances.</li> <li><b>Violation Handling Team</b> refers to the person who sanctions violations of harassment and/or bullying.</li> </ul> <p><b>Document</b> Doc.1: Submission and Settlement of Employee Grievances Procedure</p>				

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## 6. ANNEX