

This code of conduct was created to be implemented as a form of the company's commitment to comply with laws and regulations related to employee rights.

**1. Child Labor.**

In accordance with applicable laws, companies will not employ children under the age of 18. For this reason, during the recruitment process, evidence to this end will be examined in the relevant documents, namely: KTP, diploma (by providing the original diploma as a means of proof).

If in the employee recruitment process there is an oversight, namely there are employees under the age of 18, the company will treat it according to applicable laws and regulations, including: Having permission from their parents, placed on light duties, maximum working time of 3 hours, carried out during the day and with wages according to applicable regulations to guarantee their health and safety.

For apprentice students under 18 years of age (high school equivalent) the company will determine regulations including: study hours according to school hours, provision of an obligatory assignment letter from their school, no involvement in the production process, and being given a safety induction related to occupational safety and health.

**2. Forced Labor and Anti Modern Slavery (Anti Modern Slavery).**

The company guarantees that there are no employees who work due to force or involuntarily, including: workers due to imprisonment, subjugation, being required to work to pay debts / for guarantees, slavery and forced labor, etc. Employees have the right to resign with acceptable reasons.

**3. Freedom of Association and Consultation.**

Workers, without exception, have the right to join trade unions of their choice and to bargain in an orderly manner. The company adopts an open attitude towards trade union activities. Employee representatives are not treated differently and can perform their functions within the workplace. If freedom of association is prevented by law, the Company facilitates freedom of association and negotiation.

**4. Disciplinary Action.**

The company will not place sanctions on employees in any physical or psychological form as well as punishments in the form of torture, harassment or in any form whatsoever.

**5. Violence and Harassment**

The company will treat employees with respect and respect their human dignity. No one will experience intimidation, abuse/harassment in the form of: physical, sexual, psychological or other forms of physical or mental violence.

**6. Discrimination.**

The company hires and promotes employees based on their abilities, without discrimination based on race, gender, ethnicity, religion, belief, sexual orientation, or political views. We also adhere to the principle of equal treatment in hiring employees and respect for employees in the work environment. Management will not conduct pregnancy tests prior to and while employees are working.

**7. Wages and Other Benefits.**

Wages are paid according to standards in accordance with applicable regulations. All workers receive written and easy to understand information regarding wages and terms of payment. There is no wage deduction as a form of disciplinary punishment.

**8. Working hours.**

The company will follow applicable national and local regulations in terms of working hours. Except in extraordinary situations and conditions, the company will not employ employees for more than: 40 hours per week and 18 hours of overtime. All employees have the opportunity to work overtime voluntarily.

In addition, except under unreasonable circumstances, employees will get at least 1 day off in a 7-day working period.

The company will provide overtime pay according to applicable regulations.

**9. Training**

The company will treat all employees with respect and get the opportunity to be promoted equally. For this reason, employees will be given programmed training in accordance with their field of work.

**10. Occupational Health and Safety**

The company will provide a safe and healthy work environment for employees in accordance with applicable regulations. For this reason, companies must provide health facilities, health service providers and health insurance programs for employees, with the aim of achieving high work productivity. The company pays close attention to the issue of fire prevention and evacuation systems, and conducts regular training for employees. The company also provides adequate first aid kits, freedom to use separate toilets for men and women, adjusting lighting and temperature, ventilation and cleanliness in the workplace.

**11. Environment**

PT. Dan Liris understands that environmental issues are very important for business continuity in the future, therefore the company is committed to reducing the negative effects of company activities that have an impact on the environment.

The company actively avoids environmental damage and continuously improves its activities, in the following ways:

- a. Carry out organic, inorganic and B3 waste and waste management
- b. Executes Reduse, Reuse and Recycle programs. For example, bringing your containers to eat and drink that is not disposable, using reversable paper and recycling waste for compost.
- c. Saving energy by turning off all machines, lights and water when not in use.

**12. Fulfillment of C-TPAT Provisions**

As part of our efforts to improve the safety of the supply chain of goods ordered by customers, we have established principles, rules and procedures in our company and area. In addition to increasing company security, company assets, and also for the safety of all employees, issued to meet customer requirements and also American customs.

Our goal is to ensure that our company plays an important role in the security of the goods supply chain and as a company that is committed to maintaining security in our region.

**13. Anti Human Trafficking**

The company implements an Anti- Human -Trafficking policy in any form. Employees work on a voluntary basis in accordance with applicable regulations.

**14. Subcontracting and Home working**

The company ensures no unauthorized subcontracting or homework. Subcontract selection is carried out in accordance with applicable regulations.

**15. Transparency**

The company hopes that all business with production partners will run in accordance with ethics and transparency. The company does not tolerate any form of unethical behavior, including fraud, bribery, corruption, money laundering, hiding and falsifying records, or influencing workers with the intent to mislead.

**PT. DAN LIRIS**

Banaran, Grogol, Sukoharjo

(0271) 714400

<b>Company Name</b>	: .....
<b>Name</b>	: .....
<b>Position</b>	: .....
<b>Email</b>	: .....
<b>Date</b>	: .....
<b>Signed/Stamped</b>	: .....

This code of conduct was made to be implemented as a form of the company's commitment to implement the necessary safety standards to fulfill the security across all our production chains so that all goods are free of prohibited and dangerous goods.

**1. VISION AND RESPONSIBILITY**

The company has a vision and responsibility for implementing the C-TPAT program.

**2. RISK ASSESSMENT / RISK ASSESSMENT**

The company carries out a risk assessment of all possibilities that may occur, by carrying out this risk assessment, the expectation is that the company can anticipate all the worst possible risks that may occur in the company.

**3. BUSINESS PARTNER REQUIREMENT / REQUIREMENTS FOR BUSINESS PARTNERS**

Regarding security procedures, The company will work with business partners based on proposals from suppliers, signing the MOU and business partners will apply security procedures to their companies, Point of Origin , the company will send a questionnaire/list of questions related to C-TPAT to business partners.

**4. CYBER SECURITY / IT POLICY**

Cybersecurity is an activity or process that focuses on protecting computers, networks, programs and data from unwanted or unauthorized access, change or destruction. Use of keywords/passwords on the computer, responsibility for using the computer in a special room and only authorized employees may operate the computer.

**5. CONVEYANCE AND INSTRUMENTAL TRAFFIC SECURITY**

There are handling procedures starting from the arrival of the transport vehicle/container, the transportation process, to the storage/parking of the vehicle.

**6. SECURITY SEALS**

The company must provide a seal on the container as a security tool. The seal used must comply with the provisions of the ISO 17712 standard.

**7. SECURITY PROCEDURE/ PROCEDURAL SECURITY**

The company has security procedures for handling goods starting from the process of incoming goods to handling outgoing goods.

**8. AGRICULTURE SECURITY**

In carrying out the C-TPAT procedure PT. Dan Liris is committed to implementing agricultural safety in the supply chain by cleaning containers, pest control and other things that can contaminate the products they produce.

**9. PHYSICAL SECURITY**

The company has a building with a strong structure to prevent unwanted intervention from outsiders equipped with adequate entrances or gates, fences, locks as well as control and locking procedures, adequate lighting especially in door and window areas, an extensive boundary wall, and loading and unloading area as well as parking areas, in addition to the presence of personnel who are responsible for controlling and supervising it.

**10. PERSONNEL SECURITY / PERSONNEL SECURITY**

The company carries out selection and interviews of prospective employees, background checks on employees, including the treatment or procedures for employees who have been made unemployed.

**11. EDUCATION, TRAINING AND AWAREness**

The company provides education, training and awareness of the C-TPAT procedure and all forms of violations that may occur to all employees.

**12. POLICIES REGARDING HUMAN TRADE & SLAVERY, MONEY LAUNDERING AND ACTS OF TERRORISM (HUMAN TRAFFICKING & SLAVERY ACT, MONEY LOUNDRY, TERRORISM)**

It is the Company's policy not to get involved, as well as to provide training and raise awareness to employees about understanding and preventing acts of human trafficking and slavery as well as not committing money laundering and being involved in acts of terrorism.

**PT. DAN LIRIS**

Banaran, Grogol, Sukoharjo

(0271) 740888

<b>Company Name</b>	: .....
<b>Name</b>	: .....
<b>Position</b>	: .....
<b>Email</b>	: .....
<b>Date</b>	: .....
<b>Signed/Stamped</b>	: .....



MEMORANDUM OF UNDERSTANDING  
SOCIAL COMPLIANCE - CUSTOM TRADE PARTNERSHIP AGAINST TERRORISM

PT. Dan Liris has committed to participate in carrying out the Social Compliance program, which is a program of compliance with laws and regulations related to employee rights and the environment as well as the C-TPAT procedure, which is a program developed by American Customs in order to minimize the risk of acts of terrorism through means international trade. In producing and employing employees, PT. Dan Liris is obliged to carry out Social Compliance and C-TPAT procedures, besides that it is also required for us to ensure that these procedures are carried out by companies that are business partners, and or subcontracting companies with PT. DAN LIRIS.

By signing this memorandum of understanding we, PT. Dan Liris hope that your company, as our business partner, is also committed to implementing Social Compliance and C-TPAT procedures in your company.

**PT. DAN LIRIS**

Banaran, Grogol, Sukoharjo  
(0271) 714400

Company Name	:	.....
Name	:	.....
Position	:	.....
Date	:	.....
Signed/Stamp	:	.....

**STATEMENT OF FINANCIAL CONDITIONS**

Dear

PT. DAN LIRIS

Banaran Village, Grogol District

Sukoharjo Regency

T. 0271 - 740888

Yours faithfully,

The undersigned are:

Name :

Position :

Company :

Address :

We hereby declare that our company is in good health and has no significant financial problems, has not committed money laundering and is not involved in acts of terrorism in any form.

Thus this Statement Letter is issued to be in accordance with its designated use.

..... 2023

Signature/Stamp

**SOCIAL COMPLIANCE QUESTIONER**

The following questionnaire was created to find out how far your company implements social compliance with the implementation of applicable laws and regulations.

Please fill in the existing column with a check mark ☒ and if there is any information that needs to be added, please enter it in the remarks column.

**A. NUMBER OF EMPLOYEES**

NUMBER OF EMPLOYEES	MALE	FEMALE	TOTAL
PERMANENT			
CONTRACT			

**B. WORKING HOURS**

WORKING HOURS	IN	OUT	BREAK
SHIFT 1			
SHIFT 2			
SHIFT 3			

**C. REMUNERATION**

REGIONAL MINIMUM WAGES	LOWEST WAGE

**D. SOCIAL COMPLIANCE QUESTIONNAIRE**

NO	POINT	Y	N	N/A	INFORMATION
<b>1.</b>	<b>CHILD LABOR</b>				
a	Is it certain that there are no underage employees (< 18 years)?				
b	Is it possible to ensure that photocopies of ID cards and certificates from employees are kept as supporting documents to ensure that employees are not underage?				
<b>2.</b>	<b>FORCED LABOR</b>				
a	Is it certain that there are no forced labor practices occurring within the company, such as withholding identity cards/passport/diploma, etc., during the hiring process?				
b	Is it certain that there are no forced labor practices taking place within the company, such as employing detainees/convicts without being given proper wages?				
<b>3.</b>	<b>FREEDOM OF ASSOCIATION AND CONSULTATION</b>				
a	Can you ensure that employees have the right to join a trade union?				



NO	POINT	Y	N	N/A	INFORMATION
b	Does the company provide sufficient freedom for labor unions to carry out activities related to freedom of association and to negotiate or consult?				
c	Can it be ensured that employees have the freedom to express opinions, complaints, suggestions, suggestions, etc., either directly or in writing through the suggestion box?				
	Is the suggestion box properly provided in the company?				
<b>4.</b>	<b>DISCIPLINARY ACTIONS</b>				
a	Is it certain that there is no practice of imposing sanctions on employees in any form, physically, verbally or psychologically, including torture, harassment, in any form?				
<b>5.</b>	<b>VIOLENCE AND HARASSMENT</b>				
a	Does the company guarantee that no acts of violence and harassment occur?				
b	Are employees given the space to report in the event of violence and harassment?				
<b>6.</b>	<b>DISCRIMINATION</b>				
a	Can it be ensured that all employees are treated the same regardless of race, ethnicity, religion, gender etc.?				
<b>7.</b>	<b>WAGES AND OTHER BENEFITS</b>				
a	Is it possible to ensure that the company pays the minimum wage according to the applicable UMK?				
b	Is it possible to ensure that the company does not impose sanctions on employees by cutting their wages?				
c	Can it be ensured that the company pays overtime wages for work that exceeds working hours?				
d	Does the company provide annual leave entitlements to employees?				
e	Does the company provide maternity/birth leave for female employees?				
f	Do employees receive proof of wage payment slips from the company (pay slip)?				
<b>8.</b>	<b>WORKING HOURS</b>				
a	Do the working hours in the company not exceed 40 hours per week?				
b	Does the company's overtime hours not exceed 18 hours per week?				
c	Do the total working hours including overtime not exceed 58 hours per week?				
d	Does the company provide at least 1 day off in 7 working days?				
<b>9.</b>	<b>TRAINING</b>				
a	Are employees given training/socialization about the company's COC (Code Of Conduct)?				
b	Are employees given training/socialization about health and safety?				
<b>10.</b>	<b>ENVIRONMENT</b>				
a	Does the company have an environmental policy				
	Does the company save energy?				
b	Is the management of chemicals both storage and use regulated in such a way as to avoid the impact of leakage?				
c	Does the company carry out garbage and waste management?				

NO	POINT	Y	N	N/A	INFORMATION
<b>11</b>	<b>OCCUPATIONAL HEALTH AND SAFETY</b>				
a	Does your company implement Occupational Safety and Health				
b	Do employees use PPE (Personal Protective Equipment) while working				
c	Are there safety signs in the work area?				
d	Is there a Fire Protection Equipment (Hydrant, APAR, Sprinkler)				
e	Do employees receive emergency response training (Fire Evacuation Training and other disasters)				
<b>12.</b>	<b>ANTI HUMAN TRADE</b>				
a	Does the company guarantee no human trafficking practices?				
b	Are employees paid according to the provisions of the law?				
<b>13.</b>	<b>TRANSPARENCY</b>				
	Does the company not commit acts of corruption, money laundering, bribery, fraud etc.				

### **C-TPAT QUESTIONER**

The following questionnaire was created to find out how far your company has implemented C-TPAT (Custom Trade Partnership Against Terrorism) procedures

Please fill in the existing column with a check mark ☒ and if there is any information that needs to be added, please enter it in the remarks column.

NO	POINT	Y	N	N/A	INFORMATION
<b>1.</b>	<b>SECURITY DEPARTMENT</b>				
a	Reception procedures				
b	Goods receipt/delivery procedures				
c	Vehicle entry and exit procedures				
d	Procedure for controlling the loading and unloading of goods				
e	Employee entry and exit procedures				
g	Procedure for handing over guard duties				
h	Fire hazard prevention procedures				
i	Procedure for reporting unwanted things				
<b>2.</b>	<b>PERSONNEL SECURITY/ PERSONAL SECURITY SECTION</b>				
a	Recruitment procedures				
b	New hire training procedures				
c	Employee screening & background check procedures				
d	Company policies and procedure				
e	Safety regulations for employees				
f	Personal file				

NO	POINT	Y	N	N/A	INFORMATION
g	Documentation of new hire/termination				
h	Employee training documentation				
i	Procedures/policies governing human trafficking/trafficking in humans and slavery/enslavement				
<b>3.</b>	<b>WAREHOUSE SECTION</b>				
a	Procedure for receiving goods				
b	Goods storage procedure				
c	Goods delivery procedures				
d	Procedure for handling surplus/shortage of goods				
e	Schedule of checks storage of goods				
f	Security training for warehouse employees				
<b>4.</b>	<b>PRODUCTION SECTION</b>				
a	Maintenance procedures for production machines and supporting machines				
b	Procedures for handling shortage and overage of materials/finished goods				
c	Maintenance documents for production machines and supporting machines				
d	Document shortage and overage of material / finished goods				
<b>5.</b>	<b>DELIVERY / SHIPPING SECTION</b>				
a	Procedure for loading/unloading goods				
b	Seal procedure				
c	Documents for monitoring the departure of goods to their destination				
d	Goods arrival/release documents (especially finished goods)				
e	Documentation relating to the delivery of goods/exports				
<b>6.</b>	<b>INFRASTRUCTURE</b>				
a	Loading/unloading areas				
b	parking area (Employee, visitor, container)				
c	portal				
d	Locking system				
e	CCTV				
f	Emergency alarm				
g	fire extinguisher				
h	Evacuation/exit route plan				
i	Emergency door				
<b>7.</b>	<b>PURCHASING MARKETING DEPARTMENT</b>				
a	Recording of relationships that are still cooperating and those that are not cooperating				

<b>8.</b>	<b>GENERAL AFFAIR</b>			
a	The maintenance schedule for facilities and infrastructure is related to company security			
b	Procedures for checking and periodic maintenance of vehicles			
c	Documentation of checking and periodic maintenance of vehicles			
d	Are employees given safety procedure awareness training?			
e	Is training documentation kept properly?			
<b>9.</b>	<b>IT / CYBERSECURITY DEPARTMENT</b>			
a	Is there an IT procedure or policy			
b	Are all computers protected with a password			
c	If the password is wrong 3 times, the computer will be automatically blocked			
d	Every incident of wrong password input is recorded and stored in chronology			
e	Document checking and computer maintenance on a regular basis			
f	Data storage / backup procedures			
g	Does the company have battery backups/sources other than PLN.			
h	Are all employees given cybersecurity/computer security/IT policy training?			
<b>10.</b>	<b>AGRICULTURE SECURITY</b>			
a	Does the company have agricultural security procedures			
b	Does the company have pest control procedures			
	Is the cleanliness of the container protected from insects, fungi and the like.			

COMPANY DATA

COMPANY NAME :

ADDRESS :

TLP/FAX :

COMPLETED BY :

POSITION :

SIGNATURE/STAMP :

AUDITOR DL