PT. Toba Pulp Lestari - Tobafiber Division  
Standard Operating Procedure  

<table>
<thead>
<tr>
<th>SOCIAL CAPITAL</th>
<th>Document No.</th>
<th>: TPF-SOC-8012B-PR</th>
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<tr>
<td>Grievance Redressal Mechanism</td>
<td>Date of Rev./Number of Rev.</td>
<td>: 21</td>
</tr>
<tr>
<td>External</td>
<td>Date of Previous Rev.</td>
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<td>: 0</td>
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<td>Page</td>
<td>: 1 of 6</td>
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01. PURPOSE  
As a guideline in handling grievance either from internal or external of the company so that the impacts caused can be minimised by implementing effective and efficient grievance redressal mechanism and consider the principles of occupational health and safety.

02. SCOPE  
This procedure shall apply to all operational areas of PT Toba Pulp Lestari Tbk Fiber and Mill Division.

03. RELATED DOCUMENTS AND/OR REFERENCES  
- Indonesian Law No. 41 of 1999 on Forestry  
- Indonesian Law No. 18 of 2013 on Prevention and Eradication of Forest Destruction  
- Indonesian Government Regulation No. 45 of 2004 on Forest Protection  
- TPL Tobafiber ISO 14001 Environmental Management System Manual  
- Tobafiber Support Service, Emergency Response Preparedness, TPF-FSS-5005B-PR

04. RELATED FORMS AND ANNEXES  
- Grievance Form  
- Grievance Settlement Report  
- Grievance Recapitulation Report

05. DEFINITIONS  
1) **Forest** shall mean a unity of ecosystem in the form of a large stretch of land containing biological resources dominated by trees in its natural alliance, which cannot be separated from one another.  
2) **Factory/Mill** is any place where human factors, machinery and equipment, materials, energy, capital, information of natural resources and others are managed all together in a production system to generate a product effectively, efficiently and safely.  
3) **Forest disturbance** shall mean the destruction of forests, forests zone, and forest products caused by human actions, fires, natural disasters, pests and diseases, such as forest fires, illegal logging, forest encroachment, poaching, shepherding as well as pests and plant diseases.  
4) **Grievance** is a statement or expression of dissatisfaction with one product or service, both orally and in writing, both from an internal and external party.  
5) **External Grievance** is a statement or expression of dissatisfaction with one product or service, either orally or in writing, from an external party.  
6) **Grievance Mechanism** is a series of activities undertaken in handling grievances/complaints related to the work process as well as reducing and preventing conflict.  
7) **Complainant** is an external party who express grievance, demand and/or claim of ownership of something.
8) **External party** includes Individual, Government (Village, Sub-district, District, Provincial and Central) or Non-Government (indigenous leaders, community organisations - ORMAS, Local, National and International Non-Governmental Organisations).

9) **Mass organisation** is a social group formed voluntarily by the public, both legal entities and non-legal entities, on the basis of commonality of activities, professions, goals that serve as a means of public participation in the State development.

10) **Non-Governmental Organisation/NGO** is an organisation founded by individual or group of people who voluntarily provide services to the general public without the intention to gain profit from its activities.

### 06. RESPONSIBILITY

1) **Assistant HO Socap Manager** shall be responsible for monitoring, ensuring grievance redressal within the factory/mill is carried out in accordance with this procedure and resolving any complaints received by the grievance management unit. The form of responsibility include:

   1. Grievance redressal in the sector area
   2. Clarification and verification on grievance evidence with the complainant
   3. Preparing documentation report (photo, notes) clarification and verification
   4. Determining the form settlement
   5. Discussing with the complainant to reach agreement on the measures of settlement
   6. Monitoring the measures of settlement

2) **Assistant Socap Sector Manager** shall be responsible for monitoring, ensuring grievance redressal within the factory/mill is carried out in accordance with this procedure and resolving any complaints received by the grievance management unit. The form of responsibility include:

   1. Grievance redressal in the sector area
   2. Clarification and verification on grievance evidence with the complainant
   3. Preparing documentation report (photo, notes) clarification and verification
   4. Determining the resolution form
   5. Discussing with the complainant to reach agreement on the measures of settlement
   6. Monitoring the measures of settlement

3) **Sector Manager** shall be responsible for monitoring, supporting and supervising the social capital assistant in the grievance redressal process within the forest/sector area, thus carried out in accordance with this procedure and ensuring grievances are received properly and appropriately.

4) **Officer SHR Fiber as Grievance Management Unit** shall be responsible for:

   1. Grievance handling in the forest/sector area
   2. Supporting and assisting any grievance mechanisms undertaken in the forest/sector area.

5) **Assistant Socap Sector Manager as Grievance Committee** shall be responsible for:

   1. Grievance redressal in the factory/mill area
   2. Clarification and verification on grievance evidence with the complainant
   3. Preparing documentation report (photo, notes) clarification and verification
4. Determining the resolution form  
5. Discussing with the complainant to reach agreement on the measures of settlement  
6. Monitoring the measures of settlement  

6) Assistant Socap Sector as Grievance Management Unit shall be responsible for:  

1. Grievance redressal in the factory/mill area  
2. Recording grievance on the Grievance Form  
3. Identification and survey against grievance evidence having been received.  
4. Together with the Grievance Committee to clarify and verify the grievance evidence with the complainant  
5. Together with the Grievance Committee to hold discussions in order to determine the form of grievance settlement  
6. Implementing the measures of settlement that have been agreed upon  
7. Preparing grievance settlement report and grievance recapitulation report.  
8. Submitting grievance settlement report, Grievance Form and grievance recapitulation report to SHR Mill Manager every Monday in the first week of every month.

07. PROCEDURE  
1) Grievance  
There are some grievance classifications recognised in PT. Toba Pulp Lestari, Tbk namely:  
   a. Environmental Grievance  
   b. Manpower/Contractor/Partner Grievance  
   c. Indigenous Land Grievance  
   d. Land Claims Grievance  
   e. Transportation/Road Transport Grievance  
   f. Grievance on Employee's Behaviour (harassment, drugs, violence, etc.)  
   g. Grievance due to the traffic activities of TPL logging trucks  
   h. Public grievance about the provision of TPL CD Funds which benefits are not directly enjoyed by the community.  
   i. Public grievance about the logging truck speeding up without paying attention to the safety of other road users.  
   j. Grievance from community members whose plants are damaged by TPL heavy equipment.  
   k. Grievance about the road damage due to TPL transportation activities  
   l. Grievance about the proposals that have not been realised or are not approved by TPL  
   m. Grievance of people who did not get job opportunities  

2) SCOPE  
Grievance redressal activities include the following:  
   a. Grievance from any external parties, factory or forest or sector  
   b. Grievance about behaviour of the contractors/partners

3) Grievance Redressal  
   a. The complainant submits a grievance through the grievance official channel provided by the company.  
   b. The grievance handling staff receives and records the grievance on the grievance form, facilitates the recording of grievance at the grievance logbook and informs the
complainant that the complaint will be followed up and will be re-informed no later than 4 days after receipt of the complaint.
c. The grievance handling staff shall identify and classify the grievance received.
d. **If the grievance is classified as Minor**, then the grievance handling staff will inform the grievance to the Assistant Sector Manager or HO Assistant Manager and also to the Sector Manager
e. Assistant Manager/Sector Manager shall perform clarification and verification against grievance evidence with the complainant
f. Assistant Manager/Sector Manager shall hold a discussion to determine the form of settlement for the clarified and verified grievance.
g. Assistant Manager/Sector Manager shall implement the measures of settlement having been agreed upon and prepare any documents of the settlement.
h. Assistant Manager/Sector Manager shall prepare the grievance settlement report and perform monitoring
i. **If the grievance is classified as Medium**, then the complaint handling staff will inform the grievance to the Assistant Sector Manager or HO Assistant Manager and also Sector Manager
j. Assistant Manager/Sector Manager shall report to Socap 1 and Fiber 1 the grievance and its evidence
k. Assistant Manager/Sector Manager together with Socap 1 dan Fiber 1 shall hold preliminary discussion to find the settlement
l. Assistant Manager/Sector Manager shall implement the measures of settlement having been agreed upon and prepare any documents of the settlement.
m. Assistant Manager/Sector Manager shall hold a meeting with the complainant to reach an agreement on the measures of settlement to be taken.
n. Socap 1 dan Fiber 1 shall monitor the measures of settlement.
o. Assistant Manager/Sector Manager shall prepare the grievance settlement report and perform monitoring
p. **If the grievance is classified as Major**, then the grievance handling staff will inform the grievance to the Assistant Sector Manager or HO Assistant Manager and also Sector Manager
q. Assistant Manager/Sector Manager with Socap 1 and Fiber 1 shall report to TPL Management
r. Assistant Manager/Sector Manager together with Socap 1, Fiber 1, and TPL Management shall discuss an action plan.
s. Assistant Manager/Sector Manager shall implement the measures of settlement having been agreed upon and prepare any documents of the settlement.
t. Assistant Manager/Sector Manager shall prepare the grievance settlement report and perform monitoring.
u. **Official channel for grievance submission:**
   Mobile/SMS: 0812 6210 461
   Email: pengaduan@tobapulp.com

08. RECORD KEEPING

**SHR Mill Manager, SHR Fiber Manager** and Assistant Socap Sector Manager shall be responsible for keeping the following records for 5 years:

- Grievance Form
- Grievance Redressal Report
### Annexe 1: Grievance Redressal Procedure

<table>
<thead>
<tr>
<th>Complainant</th>
<th>Grievance Redressal</th>
<th>Acceptance, Recording and Validation</th>
<th>Identification and Clarification</th>
<th>Problem Identification</th>
<th>Clarification and Verification</th>
<th>Preparation of Action Plan</th>
<th>Action and Supervision</th>
<th>Process Closing</th>
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<tbody>
<tr>
<td>Expressing the grievance orally/email/SM S/cal centre</td>
<td>Recording a grievance on the grievance form</td>
<td>Conducting an identification and clarification on the grievance received</td>
<td>1. Minor Grievance</td>
<td>Assistant Manager/Sector Manager shall clarify and verify the grievance evidence with the complainant</td>
<td>Assistant Manager/Sector Manager shall hold a discussion to determine the form of settlement for the clarified and verified grievance.</td>
<td>Assistant Manager/Sector Manager shall implement the measures of settlement having been agreed upon and prepare any documents of the settlement.</td>
<td>Providing response to the action having been done</td>
<td>Assistant Manager/Sector Manager shall prepare the grievance settlement report and perform monitoring</td>
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<td>2. Medium Grievance</td>
<td>Assistant Manager/Sector Manager shall clarify and verify the grievance evidence with the complainant</td>
<td>Assistant Manager/Sector Manager together with Socap 1 and Fiber 1 shall hold preliminary discussion to find the settlement.</td>
<td>Assistant Manager / Sector Manager shall implement the measures of settlement having been agreed upon and prepare any documents of the settlement.</td>
<td>Assistant Manager/Sector Manager shall prepare the grievance settlement report and perform monitoring</td>
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<td>3. Major Grievance</td>
<td>Assistant Manager/Sector Manager with Socap 1 and</td>
<td>Assistant Manager/ Sector</td>
<td>Assistant Manager / Sector Manager shall implement the measures of</td>
<td>Assistant Manager/Sector Manager</td>
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PT. Toba Pulp Lestari - Tobafiber Division  
Standard Operating Procedure

SOCIAL CAPITAL  
Grievance Redress Mechanism

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<td>April 2017/0</td>
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<tr>
<th>Fiber 1 shall report to TPL Management</th>
<th>Manager together with Socap 1, Fiber 1, and TPL Management shall discuss an action plan.</th>
<th>settlement having been agreed upon and prepare any documents of the settlement.</th>
<th>shall prepare the grievance settlement report and perform monitoring</th>
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<tr>
<td>Schedule</td>
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