

Security Guard Policy
for
PT Domas Agrounti Prima

1 INTRODUCTION

[The Project Company, PT. Domas Agrointi Prima (DAP), is a large and unique producer of top quality highly-refined oleochemical products. DAP is the oleochemical producing arm of PT Bakrie Sumatera Plantation Tbk (BSP), one of the oldest and largest Indonesian plantation conglomerates and a vertically integrated palm fruit plantation and processing operation. The project is currently mothballed, and the BSP management is working to fund and execute a restart of the existing operating equipment and a build-out of the partially-completed capabilities.]

This document is a Security Policy describing the duties, training levels and powers of security guards at the Project site.

The Security Policy is a living document and it will be regularly monitored, reviewed and updated by DAP throughout all stages of Project implementation.

2 PROJECT DESCRIPTION

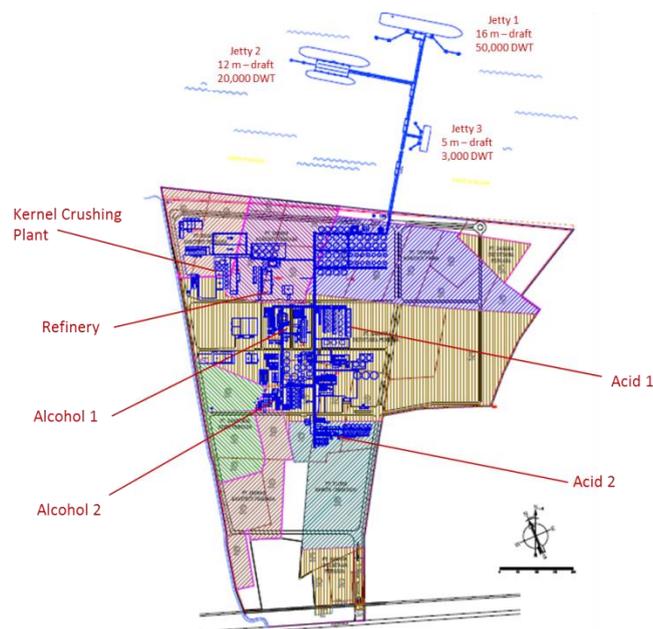
2.1 PROJECT LOCATION

The oleochemical processing facilities (the "Project") of DAP are located on a land area of around 114 Ha within the PT Sarana Industri Perkasa industrial estate in Kuala Tanjung, North Sumatra, Indonesia. The manufacturing sites are easily accessible from the locations of BSP's other plantations. The Project is surrounded on three sides with a high wall, with the fourth side facing the ocean. There is a large metal gate at the entrance to the Project site with a guard booth. There are also guard posts placed intermittently around the grounds.

2.2 PROJECT CHARACTERISTICS

This plant is comprised of 6 key facilities:

1. Line 1 Fatty Acid and Fatty Alcohol (100% completed);
2. Line 2 Fatty Acid and Fatty Alcohol ([]% completed);
3. Refinery ([]% completed);
4. Kernel Crushing Plant ([]% completed);
5. Jetty ([]% completed); and
6. Power Station (In design stage)



3 REGULATORY REQUIREMENTS

[Currently being researched]

4 DUTIES OF SECURITY GUARDS

- I. Enforce the prevailing regulations within the workplace, specifically in relation to security and other tasks given by the company, such as:
 - a. The procedure for employee identification;
 - b. The procedure for guest reception (including identification procedures);
 - c. The procedure for vehicle screening and inspection for weapons, explosive devices or other dangerous items;
 - d. The procedure for parking vehicles;
 - e. Maintaining a security journal for reporting; and
 - f. Providing polite and appropriate interpersonal service to clients/customers.
- II. Coordinating with local police to address and investigate any onsite security incidents.
- III. Safeguarding the workplace.
- IV. Patrolling the workplace according to the proper route and time, and identifying any suspicious activities around the workplace that may pose a threat to the company.
- V. Escorting key management personnel, buyers or suppliers when necessary.
- VI. Taking the appropriate measures to mitigate the consequences of a security breach including:
 - a. Securing the scene of the breach;
 - b. Capturing and handcuffing the culprit (if caught in the act) without using excessive force;
 - c. Helping the victim(s) with needed support such as first aid, emotional comforting and contacting of family members;
 - d. Asking for appropriate assistance from the local police as soon as possible; and
 - e. Appropriate reporting of the security breach to relevant Project Company departments.
- VII. Alerting the Project Company in case an emergency event occurs that could endanger the lives of employees at the site and local community members, and to provide aid when needed.

5 TRAINING LEVELS OF SECURITY GUARDS

Key areas of focus in the training of security guards include:

- I. How to identify and respond to risks or threats to the safety of plant employees or members of the surrounding communities
- II. When to use force and the appropriate amount of force to use in various situations
- III. When to involve police and local authorities in a security breach

There are three levels of training for a security guard:

- I. Basic Level: This is a compulsory basic training for prospective members of the unit. The training period is four weeks, consisting of 232 hours of lessons.
- II. Supervisor Level: This is an advanced training for members of the security guard force who have acquired the Basic qualification. The training period is two weeks, consisting of 160 hours of lessons. This qualification may or may not result in actual supervisory responsibility. It does, however, entitle the member to (at least) additional seniority of rank.
- III. Security Manager Level: This training is open to anyone at the manager level. This level of training requires 100 hours of relevant lessons.

6 ACTIONS IN THE EVENT OF A SECURITY BREACH

- I. Report the breach to the commander of the unit (unit structure and hierarchy is forthcoming)
- II. Evaluate the scene of the breach
- III. Determine the impacts and effects of the breach before reporting it to the authorities
- IV. If the incident is to be reported, then:
 - a. Report it to the police;
 - b. Secure the scene of the incident;
 - c. Do not touch anything that is in the scene, in order to facilitate the investigation by the police; and
 - d. Do not allow anyone, with the exception of police and emergency personnel and caregivers, to enter the scene.
- V. If a security guard happens to be at the scene when the incident occurs, that particular guard is obliged to stand as a witness to the incident
- VI. Ask the following questions during an investigation (among others): Where, who was there, using what, why, how, when.

7 WEAPONS AND EQUIPMENT

Handcuffs

The handcuffs used by security guards will be according to the standard used by the national police, namely the hand and thumb cuffs. The function of these handcuffs are to secure the suspect before taking him/her to the authorities.

Currently, none of the security guards at the Project site are carrying firearms and the Project Company does not anticipate the need for any security personnel to possess a firearm, even after operational restart. Should firearms ever be seriously considered, this would be following a strict and extensive internal review as well as substantial training of guards and input from key stakeholders.

8 TIMELINE

As the Project is partially complete and there is already a working office on site, there currently exists a security team in place to ensure that there is no trespassing or theft at the site.

The security team will need to be expanded in the ramp up to operational restart. This process will begin six months before restart along with the general hiring practices. Also, at this point the design of the guard force organization will be determined.

Training of the new security team members will begin three months prior to operational restart.

8 RESOURCES

HR and Health, Safety and Environment manager will coordinate with finance officer and general manager for resources required for training materials and recruitment activities. This will include the determination of guard force qualifications required as well as recruitment and hiring procedures.

9 REPORTING

Pacific Harbor and the general manager of the Project Company will receive monthly site safety reports and senior management in Jakarta will receive quarterly reports.

10 CONTACT DETAILS

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