

Our Ref: CLD-CSR-288

November 5, 2015

Mrs. Tessel Pauli
Urgent Appeals Coordinator
Clean Clothes Campaign International Secretariat

Mr. Pak Esfari
HR Group Director
Pinarub Group

Dear Sirs,

We refer to our letter dated October 23, 2015 (Ref. CLD-CSR-283) on the dispute between P.T. Pinarub Industry, P.T. Pinarub Dwikarya Benua, P.T. Pinarub Dwikarya Cikupa, ("PDK") and GSBI-SBGTS PT Pinarub Dwikarya ("GSBI-SBGTS") and continue to preparation for Pleadings.

We refer to the following code, charts and other materials, and show Undisputed Facts (September 1, 2012 to September 30, 2012) to avoid doing that all over again:

Attached 1: Code of letters (revised)
Attached 2: Inquiry & answer PDK
Attached 3: Inquiry & answer GSBI-SBGTS
Attached 4: Inquiry, answer & comment PDK
Attached 5: Inquiry, answer & comment GSBI-SBGTS
Attached 6: M164, 264 VS CCC15-7
Attached 7: M264 VS CCC15-7
Attached 8: CCC15-7

Undisputed Facts Proposed (From September 1, 2012 to October 31, 2012)

9. September 2012

9.1 September 4

9.1.1 GSBI-SBGTS along with DPP.GSBI visited to the National Human Rights Commission ("NHRC") to submit complaints directly related to the issue that occurred in PDK (Ref. G12-2 Page 1 modified).

9.2 September 6

9.2.1 NHRC has issued a letter addressed to President of PDK, with number: 1,799/K/PMT/IX/2012 about asking clarification and insistence to stop intimidation action (Ref. G12-2 Page 2).

9.2.2 Where the parities of PDK within 14 days should explain in terms of a. the use of the police and b. the PDK's actions to intimidation and pressure on workers who joined in the strike to resign (Ref. G12-2 Page 2 modified).

9.2.3 PDK received the NHRC letter 1,799/K/PMT/IX/2012, but received on 27th September 2012(Ref. PDK12-3 Page 1).

9.2.4 What the NHRC letter asked PDK to explain within 14 days is the right content of the letter what PDK had received (Ref. PDK12-3 Page 1 modified).

9.3 September 12

9.3.1 SGBT-GSBI member reduces down to 10 (Ref. PDK12-2 Page 1 modified).

9.3.2 Total number of employee of PDK dated September 12, 2012 is 2402 persons and a detail of association is SGBT-GSBI: 10, SPN: 153, SPI: 1522, non-member: 717 (Ref. PDK12-2 Page 1 modified).

9.4 September 19

9.4.1 NHRC has issued a letter addressed to President of PDK, with number: 1,867/K/PMT/IX/2012 about insistence to stop intimidation action and paying wages (Ref. G12-2 Page 2).

9.4.2 Where the contents of the letter was a. urge PDK to pay workers' rights and wages that have not been given until any a legal decision remains and pay the back payment of wages since January to March 2012 who have not been paid (Ref. G12-2 Page 2 modified).

9.4.3 Where the contents of the letter was c. delivering answers and the results of follow-up letter to NHRC within 14 (fourteen) working days after PDK received a letter.

9.4.4 PDK received the NHRC letter 1,867/K/PMT/IX/2012 (Ref. PDK12-3 Page 1).

9.4.5 PDK received the NHRC letter 1,867/K/PMT/IX/2012 on September 27th together with the NHRC letter dated September 6, 2012 1,799/K/PMT/IX/2012 (Ref. PDK12-3 Page 1).

10. October 2012

10.1 October 5

9.5.1 DPP.GSBI has pressed the police to release Omih under the support of various parties including DPR.RI IX Commission, NHRC, the Ministry of Women's Empowerment, Ministry of Manpower, and that has urged PDK to immediately revoke their report to the Police Resort (Ref. G12-2 Page 3).

10.2 October 8

10.2.1 GSBI, SBGTS-GSBI have attended the Public Hearing organized by the Commission IX of Parliament House ("Manpower Commission"), which was also attended by the Director General of Industrial Relation Settlement of Ministry of Manpower and the Public Hearing held by the Manpower Commission was conducted after receiving a complaint submitted by SBGTS-GSBI (Ref. G12-2 Page 3).

10.3 October 10

10.3.1 The Manpower Commission visited PDK and the Chairperson of Commission urged PDK to rehire immediately unconditional about 1.300 workers who unilateral dismissal and pay rights that have not been received since declared unilateral layoffs, and urged PDK to withdraw their report to the police resort on behalf Omih (Ref. G12-2 Page 3-4).

10.3.2 The result is that the Manpower Commission urges everyone attend the meeting/mediation to make small team consist of Labor department, PDK and

SBGTS-GSBI (Ref. PDK12-3 Page 3).

10.3.3 PDK agreed on involved in the small team as described on the above to seek opportunity to solve the case (Ref. PDK12-3 Page 3).

The above are the Undisputed Facts (from September 1, 2012 to October 31, 2012) proposed. Please note that we have made modifications in case that the parties have different opinions and/or views at that points.

If you need the original documents of Arguments to check details, please do not hesitate to request us.

If you find any mistypes or misunderstanding on "your own part", please let us know. If we do not receive any objection or response on "your own part" by November 19, 2015, we will construe "your own part" as Undisputed Facts.

We will send the Open Letter of Inquiry based on the Undisputed Facts and our consideration soon.

Yours sincerely,


Yasushi TAKAHASHI

Special Staff to General Manager

Corporate Legal Department

Attached:

1. Code of letters (revised)

Cc:

Mr. Toshiaki MIZUNO, Deputy Senior Manage of President Office

Mr. Tadashi BEPPU, Deputy Senior Manager for CSR

Ms. Akiko Gono, Director of International Affairs Bureau, UA Zensen

Attached 1 Code of letters (revised)

PDK12-0: AUG 8, 2012 received, Chronology of Strike

IA12-1: AUG 25, 2012 IndustriALL Letter

M164_P: AUG 27, 2012 CLD-CSR-164, OLI to PDK 1

M165_G: AUG 27, 2012 CLD-CSR-165, OLI to GSBI 1

M167_I: AUG 31, 2012 CLD-GNL-167, Letter to IA12-1

PDK12-1: SEP 5, 2012 PDK Answer 1 to M164

G12-1: SEP10, 2012 GSBI Answer 1 to M165

PDK12_2: SEP14, 2012 PDK Answer 2 to M164

PDK12_N-1: OCT 3, 2012 PDK Answer 1 to NHRC 1,799/K/PMT/IX/2012

G12_2: OCT17, 2012 GSBI Answer 2

M173_G: OCT18, 2012 CLD-CSR-173, OLO to G12-2

M172_P: OCT19, 2012 CLD-CSR-172, OLO to PDK 12-1 and 12-2

M177_G: OCT19, 2012 CLD-CSR-177, OLO to G12-1

M178_P: OCT26, 2012 CLD-CSR-178, OLI to PDK 3

M179_I: OCT31, 2012 CLD-GNL-179, Letter to IA12-1

PDK12-3: NOV 2, 2012 PDK Answer 3 to M178

PDK15-1: FEB26, 2015 received, Chronology

CCC15-1: JUN11, 2015 CCC Letter

CCC15-2: JUN16, 2015 CCC Email

CCC15-3: JUN19, 2015 CCC Email

CCC15-4: JUN22, 2015 CCC Email

CCC15-5: JUN29, 2015 CCC Email

CCC15-6: JUL16, 2015 CCC Email

CCC15-7: AUG20, 2015 CCC Letter

M260_C: JUN11, 2015 CLD-CSR-260 Letter to CCC

M262_C: JUN19, 2015 CLD-CSR-262 Letter to CCC

M263_C: JUN26, 2015 CLD-CSR-263 Letter to CCC

M264_C: JUL10, 2015 CLD-CSR-264 Letter to CCC

M267_C: JUL24, 2015 CLD-CSR-267 Letter to CCC

M270_C: AUG21, 2015 CLD-CSR-270 Email to CCC

M271_C: AUG31, 2015 CLD-CSR-271 Letter to CCC

M276_P: SEP30, 2015 CLD-CSR-276 Letter to PDK

IA15-1: SEP29, 2015 IndustriALL Letter

M277_I: SEP30, 2015 CLD-CSR-277 Letter to IA15-1

M280_I: OCT13, 2015 CLD-CSR-280 Letter to IA15-1