

COMPANY CODE OF CONDUCT

I. COMPANY BUSINESS ETHICS

Business ethics refers to how the Company, as a business entity, behaves, acts ethically, and acts in an effort to balance the Company's interests with the interests of stakeholders in accordance with the principles of good corporate governance (GCG) and corporate values, while maintaining the Company's profitability.

1. Compliance with Legislation

Regulations are legal products that must be complied with and serve as guidelines. Therefore, compliance with the law is a fundamental standard and ethical obligation that must be followed. Understanding the applicable laws and regulations in all activities must be internalized in every business activity of the Company. Adhering to laws and regulations is a key element that must be upheld in every action taken by employees of the Company. For further provisions, refer to the Company's applicable regulations.

2. Anti-Fraud, Anti-Bribery, and Anti-Corruption

Fraud is an act of deception or manipulation carried out by individuals or groups within the Company with the aim of gaining unlawful personal benefits or harming the Company, employees, stakeholders, or other related parties. Impact personnel are prohibited from committing fraud or directly instructing others to do so for the benefit of any individual.

Bribery is a payment intended to influence someone's actions or decisions in their position, contrary to their duties, for the benefit of the briber. Impact personnel are prohibited from offering or accepting bribes or instructing others to do so for the benefit of any individual.

Corruption is the abuse of power, position, or authority by an individual within the Company with the aim of gaining personal, group, or certain party benefits, to the detriment of the Company, employees, or other stakeholders. Impact personnel are prohibited from committing acts of corruption or directly instructing others to do so for the benefit of any individual.

Facilitation payments refer to payments made to external parties intended to facilitate the Company's business, which exceed the usual or reasonable business practice. Impact personnel are prohibited from engaging in facilitation payment practices with external parties or directly instructing others to do so for the benefit of any individual.

For further information, please refer to our [Anti-Fraud, Anti-Bribery, and Anti-Corruption Policy](#).

3. Concern for Occupational Health and Safety (OHS)

In order to achieve a healthy, safe, productive, independent, effective, and efficient workforce in all aspects of the Company's activities, Impack personnel must:

- a. Comply with applicable occupational health and safety regulations at both national and international levels.
- b. Create and maintain a safe working environment with a focus on prevention, which involves avoiding accidents.
- c. Understand and adhere to all safety procedures that have been implemented.

4. Equal Opportunities for Employees

Uphold the principles of fairness, equality, and non-discrimination—regardless of religion and/or belief, race or ethnicity, nationality, personal relationships (friendships and kinships), skin color, citizenship, gender, pregnancy, age, disability, veteran status, or other characteristics protected by law—in treating employees to ensure they receive appropriate assignments, education and training, compensation, promotions, and retirement benefits in accordance with applicable regulations.

Enforce Company laws and regulations consistently without discrimination based on race, gender, religion, or position.

Comply with applicable labor regulations, including those governing freedom of association, assembly, and expression.

For more information, refer to our [Human Rights Policy](#).

5. Environmental Stewardship

Impack is committed to promoting environmental responsibility and sustainable practices across all aspects of its operations. In line with this commitment, the Company strives to minimize its environmental footprint by following best practices in resource management, energy efficiency, and waste reduction. Impack employees are expected to:

- a. Comply with applicable environmental laws and regulations to ensure that operations are conducted in an environmentally responsible manner.

- b. Implement sustainable practices by utilizing resources efficiently, promoting the use of new and renewable energy, and minimizing waste through initiatives such as recycling, reuse, and resource consumption reduction.
- c. Ensure the proper handling and disposal of hazardous and toxic materials in accordance with the Company's hazardous waste management policy, while minimizing risks to the environment and human health.
- d. Foster environmental awareness among employees, suppliers, and other stakeholders, while encouraging responsible environmental practices and participation in sustainability initiatives.
- e. Support the Company's circularity efforts, including waste reduction programs, recycling, and the development of sustainable products through innovation, research, and partnerships.
- f. Report and address environmental incidents promptly and accurately, ensuring corrective and preventive actions are taken appropriately to reduce any harmful environmental impact.

For more information, please refer to our [Environmental Policy](#).

II. ETHICS RELATING TO STAKEHOLDERS

RELATIONSHIP WITH SHAREHOLDERS		
Obligations		Prohibitions
1	Improve performance and continuous learning to increase shareholder value.	Disregard shareholder interests.
2	Apply GCG principles related to relationships with shareholders.	Provide incomplete or inaccurate information to shareholders.
3	Respect shareholders' rights fairly.	Defame shareholders.
4	Provide equal treatment to shareholders.	Treat shareholders differently.
5	Foster communicative and harmonious relationships with shareholders.	Ignore questions raised by shareholders.

RELATIONSHIP WITH EMPLOYEES		
Obligations		Prohibitions
1	Develop short-term and long-term work plans.	Commit human rights violations.
2	Ensure clear and equal career progression and performance appraisals.	Engage in discriminatory practices.
3	Guarantee a suitable OHS environment.	Employ minors.
4	Provide appropriate work rewards.	Delay employee salary payments.
5	Operate ethically, efficiently, and environmentally friendly.	Dispose of waste irresponsibly.
6	Provide health insurance and nutritious food.	Not include employees in the Social Security Agency for Health (BPJS Kesehatan) program.

RELATIONSHIP WITH GOVERNMENT AND LAW ENFORCEMENT AUTHORITIES		
Obligations		Prohibitions
1	Understand laws regulations related to the Company's business processes.	Engage in bribery or gratuity practices related to government and law enforcement authorities.
2	Comply with applicable laws and regulations.	Fail to cooperate with law enforcement authorities.
3	Maintain a communicative and reasonable stance towards government and law enforcement authorities.	Conceal facts related to legal enforcement or provide false information.
4	Support government and law enforcement programs.	Exploit relationships with law enforcement for personal gain (outside the Company's interests).

RELATIONSHIP WITH CONSUMERS		
Obligations		Prohibitions
1	Regularly update information about new products or additional information for existing products.	Provide incomplete or inaccurate product information to consumers.
2	Offer limited warranties according to product specifications.	Fail to provide proper after-sales services to consumers.
3	Deliver products on time.	Send products past the specified time, unless under force majeure conditions.
4	Provide excellent after-sales services.	Not respond to questions from consumers who have purchased products.
5	Provide appropriate product recommendations and solutions.	Offer products without considering the needs of consumers.

RELATIONSHIP WITH SUPPLIERS		
Obligations		Prohibitions
1	Maintain effective communication.	Receive gratuities in any form, whether for employees or affiliates.
2	Maintain professional relationships with suppliers.	Engage in procurement processes that are non-transparent and inconsistent with the Procurement Policy .
3	Submit accurate orders for goods or services.	Provide incorrect information about the specifications of the goods to be purchased.
4	Select suppliers fairly and transparently according to procedures and the Procurement Policy .	Select suppliers due to family ties with company employees.

RELATIONSHIP WITH THE COMMUNITY		
Obligations		Prohibitions
1	Uphold local norms and values.	Engage in actions that could damage the Company's reputation in the community.
2	Build harmonious relationships with the community.	Be disrespectful or rude towards the local community.
3	Implement corporate social responsibility (CSR) through creating shared value (CSV) programs that focus on community development.	Use CSR and CSV programs for personal interests.

RELATIONSHIP WITH CREDITORS		
Obligations		Prohibitions
1	Provide financial performance results.	Provide incomplete or inaccurate information to creditors.
2	Meet obligations on time.	Violate covenants agreed with creditors.
3	Perform risk management and cost calculations for new funding sources.	Commit material violations that may lead to default.
4	Provide clear, non-deceptive information to creditors.	
5	Ensure all creditors' rights are fulfilled according to agreements.	

RELATIONSHIP WITH ANALYSTS AND THE MEDIA		
Obligations		Prohibitions
1	Provide accurate and non-deceptive information to analysts and the media.	Provide unauthorized information to analysts and the media.
2	Be polite and courteous when dealing with analysts and the media.	Be emotional or rude in dealing with analysts and the media.
3	Address constructive criticism from analysts and the media.	Spread false news to analysts and the media.
4	Build professional relationships with analysts and the media.	Receive gratuities from analysts and the media for providing unauthorized information.

III. ETHICAL STANDARDS OF MANAGEMENT AND EMPLOYEES

In order to maintain harmonious relationships between management and employees, the following ethical conduct should be followed:

1. Behavior of Superiors Towards Subordinates

- a. Accept ideas and inputs from subordinates as part of decision-making processes.
- b. Listen to and assist subordinates with practical solutions to work-related complaints.
- c. Lead by example in terms of discipline in the Company.
- d. Share knowledge gained from education and training attended.
- e. Provide motivation and guidance for job performance.
- f. Promote a culture of compliance with GCG and Company policies.
- g. Offer constructive and fair corrections or reprimands without demoralizing subordinates.
- h. Respond to disciplinary violation reports fairly and transparently according to Company regulations.
- i. Avoid intimidation, threats, or harassment towards subordinates.
- j. Protect employees who report suspected violations.
- k. Encourage performance improvement to develop leadership candidates.

2. Behavior of Subordinates Towards Superiors

- a. Obey superiors' orders with full responsibility.
- b. Treat superiors with respect and politeness.
- c. Provide useful input and suggestions to superiors.
- d. Discuss work-related matters with superiors in a courteous manner.
- e. Request permission from superiors for personal or Company-related matters during working hours.
- f. Inform superiors of any suspected violations.
- g. Avoid acting beyond one's authority.
- h. Support and assist in achieving the Company's performance targets.

3. Behavior as a Colleague

- a. Remind each other to complete tasks on time and avoid delays.
- b. Accept feedback and suggestions from colleagues for work improvement.
- c. Share knowledge with colleagues.
- d. Focus on finding solutions to problems.

- e. Maintain politeness and courtesy when interacting with colleagues, both inside and outside of work.
- f. Respect others, avoid belittling or discriminating against other in work relationships.
- g. Respect and value the opinions of others, accepting differences of opinion gracefully.
- h. Avoid behaviors or comments that include intimidation, harassment, insults, mocking, defamation, slander, or belittling colleagues.
- i. Collaborate with dedication and trust to achieve common goals.

4. Intellectual Property Rights

- a. The Company must respect the intellectual property created by employees.
- b. The Company will acknowledge and reward employees for innovative contributions.
- c. Employees involved in developing processes or products for the Company must treat related information as Company property, both during and after employment.
- d. All employees must inform the Company of any work created, whether during or outside working hours, if it is related to the Company's business.
- e. Innovative works owned by the Company cannot be claimed back by employees even if not registered as intellectual property.

IV. ETHICAL BEHAVIOR OF EMPLOYEES

This section outlines the acceptable behavior at Impack. Impack employees are required to demonstrate professionalism, respect, and integrity in all interactions. These behavioral guidelines ensure a positive and productive work environment in alignment with the values upheld by the Company. Compliance with these standards is essential to maintaining a culture of accountability and mutual respect within the Company.

1. Employee Commitment to the Company

In order to enhance the credibility and trust of the Company, all Impack personnel are committed to:

- a. Thinking and behaving corporately and in a non-sectoral manner, prioritizing the Company's interests above personal and/or group interests to add value to the Company.
- b. Performing duties professionally with full responsibility, upholding integrity, honesty, and teamwork.
- c. Being responsive to complaints and feedback from stakeholders and promptly addressing them in accordance with Company regulations.
- d. Working diligently and seeking the best ways to complete tasks effectively and efficiently.
- e. Maintaining strong motivation to develop professionally, enhancing competencies, and broadening knowledge.
- f. Complying with all Company rules and values to preserve and uphold the Company's reputation.
- g. Creating and understanding work plans and goals within the scope of their responsibilities.
- h. Considering all risks when carrying out assigned tasks.

2. Maintaining the Company's Reputation

In order to maintain the Company's reputation, each Impack personnel is required to:

- a. Maintain polite and courteous behavior, both inside and outside of work.
- b. Avoid actions contrary to religious norms, laws, and ethical decency, such as consuming, distributing, or selling narcotics, other illegal drugs, alcoholic beverages, or engaging in gambling in any form.
- c. Refrain from actions that could harm or degrade the Company's dignity and reputation.

- d. Avoid entering places that may tarnish the Company's dignity or reputation.
- e. Refrain from actions that could potentially violate laws and regulations.

3. Protecting Company Information (Intangible Assets)

Each Impack personnel, based on their authority and scope of work, has access to Company information, both public and confidential. In this regard, employees are responsible for:

- a. Protecting the Company's confidential information, both during and after their employment or contractual relationship, in accordance with applicable laws and regulations.
- b. Using Company information, both general and specific, exclusively for the Company's interests.
- c. Disseminating confidential information, either orally or in writing, to other parties only as authorized by the Company.

4. Protecting and Using Company Assets

Assets are resources owned by the Company for use in achieving its goals. Protecting and utilizing assets is part of maintaining the Company's continuity. Therefore, each Impack personnel must:

- a. Use Company assets for the effective and efficient operation of the Company, in accordance with applicable regulations.
- b. Protect, maintain, secure, and preserve Company assets in accordance with applicable regulations, including not lending, selling, mortgaging, or leasing them.
- c. Use Company assets in accordance with position, authority, and job scope.

5. Insider Information

Impack personnel who have access to material information are prohibited from misusing their position or job in disclosing such information:

- a. That could influence investor decisions to buy, sell, or hold Company shares; and
- b. To individuals with special relationships who might engage in transactions involving the Company's goods and/or services.

For further details, refer to our [Insider Trading Policy](#).

6. Giving and Receiving Gifts, Entertainment, and Donations.

The behavior of Impack personnel regarding the giving and/or receiving of gifts is outlined as follows:

- a. Employees are prohibited from receiving and/or giving gifts, souvenirs, business meals, or other facilities that could influence decision-making or violate applicable regulations.
- b. Gifts received from lotteries organized by third parties related to the Company should be handed over and recorded as Company assets.
- c. Business meals with business partners and/or stakeholders may be held for the Company's benefit, with expenses that are justifiable within reasonable limits and in locations that do not create a negative image for the Company.
- d. Gifts and/or souvenirs from third parties funded by the Company must become the property of the Company.
- e. All expenses related to the giving of gifts, souvenirs, and business meals must receive authorization from the relevant Company officials.
- f. Accepting or giving bribes, or promising to give or receive bribes, is strictly prohibited.
- g. Employees must not direct others outside of the Company to engage in bribery in business activities within or outside the Company's environment.
- h. It is forbidden to offer or provide, directly or indirectly, any gifts or payments that are unreasonable to external parties to obtain advantages or special treatment in the Company's business transactions.
- i. Donations, in principle, are given to external parties as long as they comply with the Company's policies and appropriateness limits, for social purposes such as donations for natural disasters.

7. Training and Awareness

Impack is committed to providing employees with regular training and awareness programs on ethical standards at least once a year. The Company actively promotes ethical awareness through internal communications and initiatives. By empowering employees with the knowledge to make informed ethical decisions, the Company ensures they understand their role in upholding and promoting its core values.