



PT Impack Pratama Industri Tbk

EXCELLENCE THROUGH PASSION

No: 47/IP-CORSEC/VII/2024

Jakarta, 8 Juli 2024

Kepada.

PT BURSA EFEK INDONESIA

Indonesia Stock Exchange Building Tower I

Jalan Jenderal Sudirman Kav. 52-53

Jakarta 12190

Up.: **Yth. Ibu Lidia M. Panjaitan – Kepala Divisi Penilaian Perusahaan 3**

Perihal: Penjelasan Keterbukaan Informasi Terkait Transaksi Material dan Transaksi Afiliasi

Dengan hormat,

Menanggapi surat dari PT Bursa Efek Indonesia No.: S-06682/BEI.PP3/07-2024 tanggal 1 Juli 2024 perihal Permintaan Penjelasan atas Keterbukaan Informasi Terkait Transaksi Material dan Transaksi Afiliasi PT Impack Pratama Industri Tbk., berikut adalah penjelasan kami sebagai berikut:

1. Agar disampaikan laporan keuangan Mulford Holdings Pty. Ltd. periode 31 Desember 2023.

Jawaban:

Laporan Keuangan Mulford Holdings Pty. Ltd. ("MH") periode 31 Desember 2023 telah disampaikan bersamaan dengan jawaban ini.

2. Sehubungan dengan fasilitas kredit investasi dari PT Bank Central Asia Tbk, agar disampaikan:

a. Latar belakang Perseroan menggunakan fasilitas kredit investasi untuk pengambilalihan Mulford Holdings Pty. Ltd.

Jawaban:

Latar belakang Perseroan menggunakan fasilitas kredit investasi dari PT Bank Central Asia Tbk ("Bank BCA") untuk pengambilalihan Mulford Holdings Pty. Ltd dikarenakan Perseroan sebelumnya telah memiliki fasilitas kredit dari Bank BCA sehingga penggunaan fasilitas kredit investasi ini hanya memanfaatkan fasilitas Bank BCA yang telah ada. Untuk penambahan fasilitas kredit investasi ini, Perseroan mendapatkan penawaran yang kompetitif serta syarat dan ketentuan dari Bank BCA yang menurut penilaian Perseroan tidak merugikan Perseroan, seperti suku bunga yang rendah, tidak terdapat penambahan



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jaminan dari aset tetap dan penambahan hanya terjadi pada fidusia piutang dan persediaan dengan kenaikan nilai penjaminan yang Perseroan nilai wajar.

- b. Informasi atas aset Perseroan yang dijaminan untuk fasilitas kredit investasi tersebut yang paling sedikit mencakup bentuk aset, alamat lokasi aset (jika berbentuk tanah dan/atau bangunan), status kepemilikan saat ini, dan nilai masing-masing aset.

Jawaban:

Keterangan	Lokasi	Nilai Jaminan Sebelumnya	Tambahan Jaminan (Baru)	Total Penjaminan
Fidusia Persediaan Barang atas nama Perseroan	Delta Silicon 2, Cikarang Kabupaten Bekasi, Jawa Barat	Rp82.500.000.000	Rp67.500.000.000	Rp150.000.000.000
Fidusia Piutang Usaha atas nama Perseroan	-	Rp82.500.000.000	Rp17.500.000.000	Rp100.000.000.000
Tanah dan Bangunan (SHGB atas nama Perseroan)	Delta Silicon 2, Cikarang Kabupaten Bekasi, Jawa Barat	Rp497.058.750.000	-	Rp497.058.750.000

- c. Hal-hal yang dilarang dilakukan oleh Perseroan.

Jawaban:

Berdasarkan Perjanjian Kredit antara Bank BCA dengan Perseroan, hal-hal yang dilarang dilakukan oleh Perseroan adalah sebagai berikut:

- I. Selama Debitur belum membayar lunas utang atau batas waktu penarikan dan/atau penggunaan fasilitas kredit belum berakhir, Debitur tidak diperkenankan untuk melakukan hal-hal di bawah ini, tanpa persetujuan tertulis terlebih dahulu dari Bank:
1. Memperoleh pinjaman uang/kredit baru/penambahan Utang dari pihak lain/bank atau lembaga pembiayaan lainnya serta melakukan penambahan pinjaman ke



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anak perusahaan/afiliasi apabila financial covenant tidak terpenuhi dan/atau mengikatkan diri sebagai penanggung/penjamin dalam bentuk dan dengan nama apapun, memberikan Corporate Guarantee atas nama Debitur untuk mengcover fasilitas kredit grup usaha/anak usaha/perusahaan afiliasi di bank/lembaga keuangan lain dan/atau mengagunkan harta kekayaan Debitur kepada pihak lain.

2. Apabila Debitur berbentuk badan:
 - a) melakukan peleburan, penggabungan, pengambilalihan, pembubaran/likuidasi.
 - b) mengubah susunan para pemegang saham yang menyebabkan kepemilikan ultimate shareholder menjadi minoritas.
3. Apabila akan menyewakan agunan kepada pihak lain di luar grup usaha Debitur.
- II. Selama Debitur belum membayar lunas Utang atau Batas Waktu Penarikan dan/atau Penggunaan Fasilitas Kredit belum berakhir, Debitur tidak diperkenankan untuk menjual/melepas/mengalihkan hak atau kekayaan intelektual Debitur ke pihak lain di luar grup usaha, untuk hak cipta, paten, merek atas produk roofing dan ACP hasil produksi Perseroan.
4. Penjelasan lebih lanjut terkait dengan Mulford Holdings Pty. Ltd. yaitu:
 - a. Informasi dan profil anak usaha.

Jawaban:

Mulford Holdings Pty. Ltd memiliki 2 anak usaha yaitu Mulford Plastics (NZ) Limited yang beroperasi di New Zealand dan Mulford Plastics Pty. Ltd, beroperasi di Australia.

Riwayat Singkat Mulford Plastics (NZ) Limited ("MPNZ")

Pendirian MPNZ

Mulford Plastics (NZ) Limited (MPNZ) suatu perseroan terbatas yang didirikan berdasarkan Companies Act 1955 dengan nama Mulford Plastics (NZ) Pty Ltd tanggal 16 Oktober 1984.

MPNZ telah terdaftar kembali sebagai perusahaan berdasarkan Companies Act 1993 pada tanggal 30 Juni 1997.

Perusahaan berdomisili di 5 Arthur Brown Place Mount Wellington Auckland, 1060, New Zealand.



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Pemegang Saham MPNZ

Modal dasar MPNZ adalah NZD 640.000 terbagi atas 640.000 saham dengan nilai nominal per-saham sebesar NZD 1. Dari modal dasar tersebut seluruhnya telah ditempatkan dan disetor 100% sejumlah NZD 640.000.

Komposisi pemegang saham MPNZ per Tanggal Keterbukaan Informasi adalah sebagai berikut:

Pemegang Saham	Lembar saham	Modal Disetor (NZD)	Kepemilikan (%)
Mulford Holdings Pty Ltd	640.000	640.000	100
Total	640.000	640.000	100

Susunan Pengurus MPNZ

Susunan pengurus MPNZ per Tanggal Keterbukaan Informasi adalah sebagai berikut:

Direksi:

Direktur : Perry Pericleous

Direktur : Sugiarto Romeli

Kegiatan Usaha MPNZ

Kegiatan usaha MPNZ adalah di bidang distributor lembaran plastik dan plastik olahan, menyediakan panel komposit aluminium, eksterior polikarbonat, polietilena, papan busa, panel akustik, dan polistiren berdampak tinggi.

Riwayat Singkat Mulford Plastics Pty. Ltd ("MPA")

Pendirian MPA

Mulford Plastic Australia (MPA) suatu perseroan terbatas yang didirikan berdasarkan Companies Act 1936 dengan nama Mulford & Co. Pty Ltd, yang kemudian berganti nama menjadi Mulford Plastics Pty Ltd berdasarkan Companies Act 1961 pada tanggal 14 Maret 1968.



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Perusahaan berdomisili di Unit 5, 65 Balham Road Archerfield, Queensland 4108 Australia.

Pemegang Saham MPA

Modal dasar Perusahaan adalah AUD 1.480.340 terbagi atas 740.170 saham dengan nilai nominal per-saham sebesar AUD 2. Dari modal dasar tersebut seluruhnya telah ditempatkan dan disetor penuh.

Komposisi pemegang saham MPA per Tanggal Keterbukaan Informasi adalah sebagai berikut:

Pemegang Saham	Lembar saham	Modal Disetor (AUD)	Kepemilikan (%)
Mulford Holdings Pty Ltd	740.170	1.480.340	100
Total	740.170	1.480.340	100

Susunan Pengurus MPA

Susunan pengurus MPA per Tanggal Keterbukaan Informasi adalah sebagai berikut:

Direksi:

Direktur : Perry Pericleous

Direktur : Sugiarto Romeli

Kegiatan Usaha MPA

Kegiatan usaha Perusahaan yaitu distributor lembaran plastik dan plastik olahan, menyediakan panel komposit aluminium, eksterior polikarbonat, polietilena, papan busa, panel akustik, dan polistiren berdampak tinggi.

- b. Jaringan distribusi yang dimiliki Mulford Holdings Pty. Ltd dan/atau anak usaha.

Jawaban:

Jaringan distribusi yang dimiliki oleh Mulford Holdings Pty. Ltd dan anak usahanya sebanyak 14 *distribution center* di Australia dan New Zealand yang melayani lebih dari 8.300 pelanggan.



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4. Sehubungan dengan rencana perluasan ekspansi dan pasar usaha Perseroan agar disampaikan:

a. Informasi produk yang akan dijual.

Jawaban:

Produk yang dijual adalah lembaran plastik untuk *signage* dan bahan bangunan seperti *Acrylic, Polycarbonate, Alumunium Composite, PVC Foam* dan *PP (Polypropylene)*.

b. Penjelasan komprehensif terkait dengan pangsa pasar yang dituju Perseroan di Australia dan New Zealand.

Jawaban:

Mulford Holdings Pty. Ltd dan anak usahanya, Mulford Plastics (NZ) Limited dan Mulford Plastics Pty Ltd, merupakan perusahaan distribusi lembaran plastik yang telah beroperasi lebih dari 5 dekade dan selama ini telah dikenal luas oleh konsumen di wilayah Australia dan New Zealand. Untuk itu, Perseroan menargetkan pangsa pasar dan konsumen serta jaringan distribusi yang telah ada selama ini di Australia dan New Zealand. Dan apabila dikombinasikan dengan nama yang telah dikenal serta pengalaman mumpuni yang merupakan keunggulan Mulford Holdings Pty. Ltd dan anak usahanya selama ini, hal ini akan mendukung strategi Perseroan terhadap Mulford Holdings Pty. Ltd.

c. Strategi yang akan diterapkan Mulford Holdings Pty. Ltd agar dapat melakukan pemasaran secara efektif untuk mendukung perluasan ekspansi dan pasar usaha.

Jawaban:

Strategi yang akan diterapkan oleh Perseroan adalah **sinergi rantai pasokan yang terintegrasi secara vertikal** yaitu Perseroan akan menggantikan peran prinsipal dari pihak ketiga yang selama ini memasok barang ke Mulford Holdings Pty. Ltd. Perseroan akan memproduksi sendiri produk yang dijual dan didistribusikan oleh Mulford Holdings Pty Ltd seperti *Polycarbonate, Alumunium Composite, PVC Foam* dan *PP (Polypropylene)*. Melalui sinergi antar group ini, Perseroan mengharapkan terjadinya peningkatan margin, penambahan pendapatan dan pada akhirnya meningkatkan EBITDA Perseroan dalam lima tahun mendatang.



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5. Sehubungan dengan transaksi afiliasi yang dilakukan Perseroan, agar Perseroan memberikan informasi terkait dengan dasar ketentuan dan peraturan sehingga transaksi tersebut tidak perlu memperoleh persetujuan Rapat Umum Pemegang Saham.

Jawaban:

- Berdasarkan Pasal 4 ayat (1) POJK Nomor 42/POJK.04/2020 tentang Transaksi Afiliasi dan Transaksi Benturan Kepentingan ("POJK 42"), mengatur bahwa Perusahaan Terbuka yang melakukan Transaksi Afiliasi wajib:
 - menggunakan Penilai untuk menentukan nilai wajar dari objek Transaksi Afiliasi dan/atau kewajaran transaksi dimaksud.
 - mengumumkan keterbukaan informasi atas setiap Transaksi Afiliasi kepada masyarakat.
 - Menyampaikan keterbukaan informasi sebagaimana dimaksud dalam Pasal 4 ayat (1) huruf (b) dan dokumen pendukungnya kepada Otoritas Jasa Keuangan.

Perseroan telah memenuhi ketentuan Pasal 4 ayat (1) huruf (a) dan (b), dimana Laporan Penilai atas Nilai Transaksi dan Kewajaran telah disampaikan kepada Otoritas Jasa Keuangan dan diumumkan kepada masyarakat pada tanggal 25 Juni 2024.

- Berdasarkan Pasal 4 ayat (1) huruf (d) POJK 42, mengatur bahwa Perusahaan Terbuka yang melakukan Transaksi Afiliasi wajib terlebih dahulu memperoleh persetujuan Pemegang Saham Independen dalam RUPS, dalam hal nilai Transaksi Afiliasi memenuhi batasan nilai transaksi material yang wajib memperoleh persetujuan RUPS.

Berikut dijabarkan dalam bentuk tabel mengenai perhitungan nilai transaksi sebagai berikut:

	Nilai Transaksi (Rp.)	Ekuitas Perseroan (Rp.)	Nilai Transaksi / Ekuitas Perseroan	Pemenuhan Kriteria Transaksi Material
Nilai Transaksi	808.000.000.000	2.487.649.831.619	32,48%	Memenuhi
	MH (Rp.)	Perseroan (Rp.)	MH / Perseroan	Pemenuhan Kriteria Transaksi Material
Total Aset	519.860.426.108	3.597.041.437.692	14,45%	Tidak Memenuhi
Laba Bersih	18.941.856.268	440.542.975.412	4,30%	Tidak Memenuhi
Pendapatan	852.791.102.147	2.860.388.195.952	29,81%	Memenuhi



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Berdasarkan data dalam tabel diatas, transaksi material yang mengandung transaksi afiliasi antara Perseroan dan Mulford Holdings Pty Ltd ("MH") merupakan transaksi material sebagaimana dimaksud dalam Pasal 3 ayat (2) POJK No. 17/POJK. 04/2020 Tentang Transaksi Material dan Perubahan Kegiatan Usaha ("POJK 17"), dengan nilai tidak lebih dari 50% dan oleh karenanya hanya wajib memenuhi ketentuan Pasal 6 ayat (1) huruf (a), (b), (c) dan (e) POJK 17 dan tidak memenuhi ketentuan Pasal 6 ayat (1) huruf (d.1) POJK 17 serta tidak memenuhi ketentuan Pasal 4 ayat 1 huruf (d) POJK 42, sehingga dengan demikian tidak wajib memperoleh persetujuan dari Rapat Umum Pemegang Saham.

6. Informasi/fakta/kejadian penting lainnya yang material dan dapat mempengaruhi harga efek Perseroan yang belum diungkapkan kepada publik.

Jawaban:

Perseroan tidak memiliki informasi/fakta/kejadian penting lainnya yang material dan dapat mempengaruhi harga efek Perseroan yang belum diungkapkan kepada publik.

Demikian Surat ini disampaikan. Atas perhatian dan kerjasamanya, kami mengucapkan terima kasih.

Hormat kami,

PT IMPACK PRATAMA INDUSTRI TBK


PT. Impack Pratama Industri Tbk

Lenggana Linggawati

Corporate Secretary

Tembusan:

Otoritas Jasa Keuangan



PT Impack Pratama Industri Tbk

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No: 47/IP-CORSEC/VII/2024

Jakarta, 8 July 2024

To:

Indonesia Stock Exchange
Stock Exchange Building Tower I
Jalan Jenderal Sudirman Kav. 52-53
Jakarta 12190

Dear Ms Lidia M Panjaitan – Head of Corporate Valuation 3 Division,

Subject : Review of Information Disclosure Related to Material Transactions and Affiliate Transactions

Yours faithfully,

Answering to the Financial Services Authority (“OJK”) letter no. S-06682/BEI.PP3/07-2024 dated July 1, 2024 regarding Request for Explanation regarding Information Disclosure Regarding Material Transactions and Affiliate Transactions of PT Impack Pratama Industri Tbk., the following is our explanation as below:

1. To submit the financial report of Mulford Holdings Pty. Ltd. period December 31, 2023.

Answer:

Financial Report of Mulford Holdings Pty. Ltd. (“MH”) for the period of December 31, 2023 has been submitted along with this response letter.

2. Related with the investment credit facility from PT Bank Central Asia Tbk, please submit:

- a. Background the Company used investment credit facilities for the takeover of Mulford Holdings Pty. Ltd.

Answer:

Background: The Company used investment credit facilities from PT Bank Central Asia Tbk (“BCA Bank”) for the takeover of Mulford Holdings Pty. Ltd. because the Company previously had a credit facility from BCA Bank, so that the use of this investment credit facility only utilized existing BANK facilities. To increase this investment credit facility, the Company received a competitive offer and terms and conditions from the BANK which according to the Company's assessment, were not detrimental to the Company, such as low interest rates, no additional collateral for fixed assets and additions only occurred in fiduciary receivables and inventories with increases the Company's fair value of the guarantee.



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- b. Information on the Company's assets pledged as collateral for the investment credit facility includes at least the form of the asset, address of the location of the asset (if in the form of land and/or buildings), current ownership status, and the value of each asset.

Answer:

Description	Location	Previous Warranty Value	Additional Warranty (New)	Total Warranty
Fiduciary of Goods Inventory on behalf of the Company	Delta Silicon 2, Cikarang, Bekasi Regency, West Java	Rp82.500.000.000	Rp67.500.000.000	Rp150.000.000.000
Fiduciary of Accounts Receivable on behalf of the Company		Rp82.500.000.000	Rp17.500.000.000	Rp100.000.000.000
Land and Buildings (SHGB on behalf of the Company)	Delta Silicon 2, Cikarang, Bekasi Regency, West Java	Rp497.058.750.000	-	Rp497.058.750.000

- c. The prohibited things to be done by the Company.

Answer:

Based on the Credit Agreement between BCA Bank and the Company, the prohibited things to be done by the Company are as follows:

- i. As long as the Debtor has not paid the debt in full- or the-time limit for withdrawals and/or use of credit facilities has not expired, the Debtor is not permitted to do the following things, without prior written approval from the Bank:
1. Obtain a loan of money/new credit/increase in debt from another party/bank or other financing institution as well as make additional loans to subsidiaries/affiliates if financial covenants are not fulfilled and/or commit itself as guarantor/guarantor in whatever form and under any name, provide a Corporate Guarantee on behalf of the Debtor to cover the credit facilities of the business group/subsidiary/affiliated company at another bank/financial institution and/or collateralize the Debtor's assets to other parties.
 2. If the Debtor is a corporate:
 - a. carry out consolidation, merger, takeover, dissolution/liquidation;
 - b. changing the composition of shareholders which causes the ultimate shareholder's ownership to become a minority



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3. If It want to rent out the collateral to other parties outside the Debtor's business group.
- II. As long as the Debtor has not paid the Debt in full or the Deadline for Withdrawal and/or Use of Credit Facilities has not expired, the Debtor is not permitted to sell/release/transfer the Debtor's intellectual property or rights to other parties outside the business group, for copyrights, patents, brands on products roofing and ACP produced by the Company.
4. Further explanation regarding Mulford Holdings Pty. Ltd. that are:
 - a. Subsidiary information and profiles.

Answer:

Mulford Holdings Pty. Ltd has 2 subsidiaries, namely Mulford Plastics (NZ) Limited which operates in New Zealand and Mulford Plastics Pty. Ltd, operating in Australia.

A Brief History of Mulford Plastics (NZ) Limited (“MPNZ”)

Establishment of MPNZ

Mulford Plastics (NZ) Limited (MPNZ) is a limited company established under the Companies Act 1955 with the name of Mulford Plastics (NZ) Pty Ltd on October 16, 1984.

MPNZ was re-registered as a company under the Companies Act 1993 on June 30, 1997.

The Company is domiciled at 5 Arthur Brown Place Mount Wellington Auckland, 1060, New Zealand.

MPNZ Shareholders

MPNZ's authorized capital is NZD 640,000 divided into 640,000 shares with a nominal value per share of NZD 1. From this authorized capital, all of it has been issued and paid up 100% in the amount of NZD 640,000.

The composition of MPNZ shareholders as of the Information Disclosure Date is as follows:

Shareholders	Shares	Paid-Up Capital (NZD)	Ownership (%)
Mulford Holdings Pty Ltd	640,000	640,000	100
Total	640,000	640,000	100



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MPNZ Management Composition

The composition of the MPNZ management as of the Information Disclosure Date is as follows:

Board of Directors:

Director : Perry Pericleous

Director : Sugiarto Romeli

MPNZ Business Activities

MPNZ's business activities are in the field of plastic sheet and processed plastic distributors, providing aluminum composite panels, polycarbonate exteriors, polyethylene, foam boards, acoustic panels and high-impact polystyrene.

A Brief History of Mulford Plastics Pty. Ltd (“MPA”)

Establishment of MPA

Mulford Plastic Australia (MPA) is a limited company incorporated under the Companies Act 1936 under the name Mulford & Co. Pty Ltd, which later changed its name to Mulford Plastics Pty Ltd under the Companies Act 1961 on March 14, 1968.

The Company is domiciled at Unit 5, 65 Balham Road Archerfield, Queensland 4108 Australia.

MPA Shareholders

The Company's authorized capital is AUD 1,480,340 divided into 740,170 shares with a nominal value per share of AUD 2. All of the authorized capital has been issued and fully paid up.

The composition of MPA shareholders as of the Information Disclosure Date is as follows:

Shareholders	Shares	Paid-Up Capital	Ownership (%)
Mulford Holdings Pty Ltd	740,170	1,480,340	100
Total	740,170	1,480,340	100

MPA Management Composition

The composition of the MPA management as of the Information Disclosure Date is as follows:



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Board of Directors:

Director : Perry Pericleous

Director : Sugiarto Romeli

MPA Business Activities

The Company's business activities are distributor of plastic sheets and processed plastic, providing aluminum composite panels, polycarbonate exteriors, polyethylene, foam boards, acoustic panels and high-impact polystyrene.

- b. The distribution network owned by Mulford Holdings Pty. Ltd and/or subsidiaries.

Answer:

The distribution network owned by Mulford Holdings Pty. Ltd and its subsidiaries have 14 distribution centers in Australia and New Zealand serving more than 8,300 customers.

4. Related with the Company's business expansion and market expansion plans, please submit:

- a. Information on sold products.

Answer:

The products sold are plastic sheets for signage and building materials such as Acrylic, Polycarbonate, Aluminum Composite, PVC Foam and PP (Polypropylene).

- b. Comprehensive explanation regarding the Company's target market share in Australia and New Zealand.

Answer:

Mulford Holdings Pty. Ltd and its subsidiaries, Mulford Plastics (NZ) Limited and Mulford Plastics Pty Ltd, are plastic sheet distribution companies that have been operating for more than 5 decades and have been widely known by consumers in Australia and New Zealand. For this reason, the Company is targeting market share and consumers as well as the existing distribution network in Australia and New Zealand. And when combined with a well-known name and extensive experience, these are the advantages of Mulford Holdings Pty. Ltd and its subsidiaries so far, this will support the Company's strategy towards Mulford Holdings Pty. Ltd.

- c. The strategy that will be implemented by Mulford Holdings Pty. Ltd so that it can market effectively to support business expansion and market expansion.

Answer:

The strategy that will be implemented by the Company is a **vertically integrated supply chain synergy**, namely that the Company will replace the role of principals from third parties who have been supplying goods to Mulford Holdings Pty. Ltd. The company will produce its own products that are sold and distributed by Mulford Holdings Pty Ltd, such as Polycarbonate, Aluminum Composite, PVC Foam and PP (Polypropylene).



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Through synergy between these groups, the Company hopes to increase margins, increase revenue and ultimately increase the Company's EBITDA in the next five years.

5. Related with affiliated transactions carried out by the Company, the Company must provide information related to the basic rules and regulations so that such transactions do not need to obtain approval from the General Meeting of Shareholders.

Answer:

- Based on Article 4 paragraph (1) POJK Number 42/POJK.04/2020 concerning Affiliate Transactions and Conflict of Interest Transactions ("POJK 42"), it regulates that Public Companies conducting Affiliate Transactions are obliged to:
 - use an Appraiser to determine the fair value of the object of the Affiliated Transaction and/or the fairness of the transaction in question;
 - announce the disclosure of information regarding each Affiliate Transaction to the public;
 - Submit information disclosure as intended in Article 4 paragraph (1) letter (b) and supporting documents to the Financial Services Authority.

The Company has complied with the provisions of Article 4 paragraph (1) letters (a), (b) and (c), which the Appraisal Report on Transaction Value and Fairness has been submitted and announced to the public on June 25, 2024.

- Based on Article 4 paragraph (1) letter (d) POJK 42, it regulates that Public Companies conducting Affiliated Transactions must first obtain approval from Independent Shareholders at the GMS, in the event that the value of the Affiliated Transaction meets the material transaction value limits that must obtain GMS approval.

The following is explained in table form regarding the calculation of transaction value as follows:

	Transaction Value (Rp)	Company Equity (Rp)	Transaction Value/Company Equity	Compliance of Material Transaction Criteria
Transaction Value	808,000,000,000	2,487,649,831,619	32.48%	Comply
	MH (Rp)	Company (Rp)	MH/Company	Compliance of Material Transaction Criteria
Total Assets	519,860,426,108	3,597,041,437,692	14.45%	Not Comply
Net Profit	18,941,856,268	440,542,975,412	4.30%	Not Comply
Revenue	852,791,102,147	2,860,388,195,952	29.81%	Comply



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Based on the data in the table above, material transactions containing affiliated transactions between the Company and Mulford Holdings Pty Ltd ("MH") are material transactions as intended in Article 3 paragraph (2) POJK No. 17/POJK. 04/2020 concerning Material Transactions and Changes in Business Activities ("POJK 17"), with a value of no more than 50% and therefore only required to comply with the provisions of Article 6 paragraph (1) letters (a), (b), (c) and (e) POJK 17 and does not fulfill the provisions of Article 6 paragraph (1) letter (d.1) POJK 17 and does not fulfill the provisions of Article 4 paragraph 1 letter (d) POJK 42, so that it is not mandatory to obtain approval from the General Meeting of Shareholders.

6. Information/facts/other important events that are material and could affect the price of the Company's securities that have not been disclosed to the public.

Answer:

The Company does not have information/facts/other important events that are material and could influence the price of the Company's securities that have not been disclosed to the public.

Thus, this letter was delivered. For your attention and cooperation, we thank you.

Best regards,

PT IMPACK PRATAMA INDUSTRI TBK

Lenggana Linggawati

Corporate Secretary

CC:

Financial Services Authority



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EXCELLENCE THROUGH PASSION



SURAT KETERANGAN PT IMPACK PRATAMA INDUSTRI Tbk ("Perseroan")

Sehubungan dengan adanya surat dari PT Bursa Efek Indonesia Nomor S-06682/BEI.PP3/07-2024 tanggal 1 Juli 2024 perihal Permintaan Penjelasan ("SURAT BURSA") yang telah di tindak lanjuti oleh Perseroan melalui suratnya Nomor 47/IP-CORSEC/VII/2024 tanggal 8 Juli 2024 perihal Penjelasan Keterbukaan Informasi Terkait Transaksi Material dan Transaksi Afiliasi ("SURAT PENJELASAN"), melalui surat keterangan ini Perseroan menginformasikan bahwa Perseroan telah menyampaikan seluruh jawaban melalui SURAT PENJELASAN, namun atas pertimbangan tertentu dari Perseroan beberapa penjelasan belum dapat dipublikasikan atau masih merupakan rahasia, khususnya untuk angka 1 dan 4 SURAT BURSA, dengan demikian dalam menanggapi SURAT BURSA tersebut Perseroan menggunakan form E074 pada aplikasi IDXnet.

Demikian agar menjadi maklum, atas perhatiannya kami ucapkan terima kasih.

Jakarta, 8 Juli 2024

PT IMPACK PRATAMA INDUSTRI Tbk



PT. Impack Pratama Industri Tbk
Haryanto Tjiptodihardjo **Lisan**
Direktur Utama Direktur



PT Impack Pratama Industri Tbk

EXCELLENCE THROUGH PASSION

COVER NOTE

PT IMPACK PRATAMA INDUSTRI Tbk ("Company")

Related with the letter from the Indonesian Stock Exchange Number S-06682/BEI.PP3/07-2024 dated July 1, 2024 regarding a Request for Explanation ("IDX LETTER") which has been followed up by the Company through letter Number 47/IP-CORSEC/ VII/2024 dated July 8, 2024 regarding Explanation of Information Disclosure Related to Material Transactions and Affiliated Transactions ("EXPLANATION LETTER"), through this statement letter, the Company informs that the Company has submitted all answers through an EXPLANATION LETTER, However, due to certain considerations from the Company, some explanations cannot be published or are still confidential, especially for numbers 1 and 4 of the IDX LETTER, therefore in responding to the IDX LETTER, the Company uses form E074 in the IDXnet application.

Thus, this letter is conveyed for your understanding, we thank you for your attention.

Jakarta, 8 July, 2024

PT IMPACK PRATAMA INDUSTRI Tbk
BOARD OF DIRECTORS

dwi.gusrialdo@impack-pratama.com

From: Notifikasi SPE OJK <n_o_replyspe@ojk.go.id>
Sent: Monday, July 8, 2024 4:55 PM
To: dwi.gusrialdo@impack-pratama.com
Subject: DRAFT IMPC Permintaan Penjelasan Emiten dan Perusahaan Publik Lainnya

Yth Bpk/Ibu dwi gusrialdo

Form status : Approved by Lenggana Linggawati

Kode Emiten : IMPC

Nama Emiten : PT Impack Pratama Industri Tbk

Nomor Surat : 47//IP-CORSEC/VII/2024

Kode Form : E075

Perihal Pengumuman : Permintaan Penjelasan Emiten dan Perusahaan Publik Lainnya

Waktu Submit : 2024-07-08 16:55:25.143

dwi.gusrialdo@impack-pratama.com

From: Notifikasi IDXnet <notifikasi.idxnet@idx.co.id>
Sent: Monday, July 8, 2024 4:54 PM
To: dwi.gusrialdo@impack-pratama.com
Subject: DRAFT IMPC Penjelasan Keterbukaan Informasi Terkait Transaksi Material dan Transaksi Afiliasi

Yth Bpk/Ibu dwi gusrialdo

Form status : Approved by Lenggana Linggawati

Kode Emiten : IMPC

Nama Emiten : PT Impack Pratama Industri Tbk

Nomor Surat : 47/IP-CORSEC/VII/2024

Kode Form : E074

Perihal Pengumuman : Penjelasan Keterbukaan Informasi Terkait Transaksi Material dan Transaksi Afiliasi

Waktu Submit : 2024-07-08 16:53:41.17

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