

## CODE OF CONDUCT OF THE COMPANY

### A. COMPANY BUSINESS ETHICS

Business Ethics is an explanation of how the Company as a business entity behaves, behaves ethically and acts in an effort to balance the interests of the Company with the interests of Stakeholders in accordance with GCG principles and healthy corporate values while maintaining the Company's profitability.

#### I. Compliance with Laws and Regulations

Regulations are legal products that must be obeyed and become guidelines. Therefore, compliance with the law is a standard and ethics that must be implemented. Understanding the laws and regulations that apply in all activities must be lived in every business activity of the Company. Complying with laws and regulations is the main element that must be maintained in every action taken by every employee of the Company. Further provisions may refer to the applicable Company regulations.

#### II. Giving and Receiving Gifts / Gratuities, Bribes and Others

The giving and/or receipt of Gifts, Souvenirs and Business Entertainment is carried out in the context of social interaction and fostering good relations between the Company and partners in a healthy and fair manner and can be accounted for without causing a conflict of interest that can affect decision making in running the Company's business.

The Company prohibits acts of Gratification, Bribery and Improper Payments that can influence decisions. Gratification is the provision of gifts including the provision of money, goods, rebates (discounts), commissions, interest-free loans, travel tickets, lodging facilities, tourist trips, free medical treatment, and other facilities. Every Impack Personnel is not allowed to accept gratuities that can influence decision making or related to his position.

A bribe is a gift intended to do or not do something in his position that is contrary to his obligations for the benefit of the bribe giver. Every Impack Personnel is not justified in offering or accepting bribes or directly instructing others to do so for the benefit of the person concerned.

Unfair Payments/Transactions are payments/transactions to parties outside the Company in order to expedite the running of the Company's business that exceeds the reasonableness/feasibility applicable in the business world. Every Impack Personnel is not justified in conducting unfair payment/transaction practices to parties outside the Company or directly ordering other people to do so for the benefit of the party concerned.

### III. Concern for Occupational Safety and Health and the Environment (K3LH)

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

1. Comply with the prevailing laws and regulations regarding Occupational Health and Safety, both at national and international levels.
2. Creating and maintaining a safe work environment and prioritizing preventive measures, namely those that avoid accidents.
3. Handling the problem of environmental pollution that occurs effectively and efficiently.
4. Understand and comply with all established Occupational Safety procedures.

### IV. Providing equal opportunities for employees to get assignments, promotions and dismissals

Upholding the principles of justice, equality and without discrimination (regardless of religious/belief background, race/ethnicity, nationality, personal relationship (friends and kinship), skin color, nationality, gender (including pregnancy), age, disability, veteran status or other characteristics protected by law) in treating prospective employees and employees to obtain assignments, education and training, compensation, promotions or retirement in accordance with applicable regulations.

Enforce Company laws and regulations consistently without distinction of race, gender, religion and position.

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

## B. ETHICS RELATED TO STAKEHOLDERS

RELATIONSHIP WITH SHAREHOLDERS		
Obligation		Prohibition
1	Improve performance and continuous learning to increase Shareholder value	Ignoring the interests of Shareholders.
2	Applying good corporate governance (GCG) principles related to the relationship with Shareholders	Provide incomplete and inaccurate information to Shareholders.
3	Respect the rights of Shareholders fairly	Defame the Shareholders.
4	Provide equal treatment to Shareholders	
5	Having a relationship communicative and harmonious with the Shareholders.	

RELATIONSHIP WITH EMPLOYEES		
Obligation		Prohibition
1	Create a short-term work action plan and long-term	Committing human rights violations
2	Ensure career path and clear and equal performance appraisal	No discriminatory practices
3	Ensuring proper K3	Employing minors
4	Give work rewards	Delay payment of employee salaries
5	Carry out business processes that ethical, efficient and friendly environment	
6	Provide health insurance and nutritious food	

RELATIONSHIP WITH GOVERNMENT AND LAW ENFORCEMENT		
	Obligation	Prohibition
1	Have knowledge of laws and regulations related to the Company's business processes	Carry out bribery and gratification practices related to the Government and Law Enforcement Officials.
2	Comply with the relevant laws and regulations.	Not cooperative with Law Enforcement Apparatus.
3	Be communicative and fair towards the Government and Law Enforcement Officials.	Covering up facts related to the law enforcement process and giving false information.
4	Supporting Government programs and Law Enforcement Officials.	Utilizing relationships with Law Enforcement Officials for personal interests (outside the interests of the Company).

RELATIONSHIP WITH CONSUMER		
	Obligation	Prohibition
1	Updating related information new product or information addition to the product that has been circulating regularly	Provide incomplete and inaccurate product information to consumers.
2	Provide a limited warranty according to product specifications	Does not provide good after sales to consumers
3	Deliver products on time	Sending products past the specified time limit, except in force majeure conditions
4	Provide after sales the excellent service	
5	Memberikan rekomendasi dan solusi produk yang tepat Provide recommendations and the right product solution	

RELATIONSHIP WITH SUPPLIERS		
Obligation		Prohibition
1	Maintain effective communication	Receive gratuities in any form, both for employees and affiliates.
2	Maintain good relationship with suppliers in a professional manner	Carry out the procurement process in a non-transparent manner and not in accordance with the Procurement Policy
3	Submit a request goods or services properly	
4	Fair and transparent selection of suppliers in accordance with Procurement procedures and Policies	

RELATIONSHIP WITH COMMUNITY		
Obligation		Prohibition
1	Upholding the local customs and norms of the community.	Take actions that can defame the company in the eyes of the surrounding community.
2	Maintain a harmonious relationship with the community	Be disrespectful and rude to the surrounding community
3	Running a Corporate Social Responsibility (CSR) program that prioritizes the development of the surrounding community.	Carry out CSR programs based on personal interests.

RELATIONSHIP WITH CREDITORS		
Obligation		Prohibition
1	Providing finance performance	Provide incomplete and inaccurate information to Creditors
2	Carry out obligations on time	Violating the covenants that have been agreed with the creditors
3	Carry out risk management and cost calculation for new funding sources	Commit a material violation that can cause a default condition
4	Provide clear and non-misleading information to creditors	
5	Guarantee all forms of creditor rights in accordance with the agreed agreement	

RELATIONSHIP WITH ANALYST AND MASS MEDIA		
Obligation		Prohibition
1	Provide accurate and non-misleading information to Analysts and Mass Media.	Provide information that is outside the authority that has been regulated by the Company to Analysts and Mass Media.
2	Be polite and friendly in dealing with Analysts and Mass Media.	Be emotional and rude in dealing with Analysts and Mass Media
3	Following up on constructive criticism submitted through Analysts and Mass Media.	Spreading untrue news to Analysts and Mass Media.
4	Foster good relations and establish a professional closeness with the Analysts and the Mass Media.	Receive gratification from Analysts and Mass Media for providing information that should not be given.

## C. ETHICAL STANDARDS OF MANAGEMENT AND EMPLOYEES

In order to maintain a harmonious relationship between Management and Employees, it is necessary to be based on ethical behavior including:

### 1. Behavior of leaders towards subordinates

- a. Receive ideas and input from subordinates as a consideration for decision making.
- b. Listen to subordinates' complaints related to work and help with practical solutions.
- c. Be a role model in terms of work discipline in the company.
- d. Share knowledge on education and training that has been followed.
- e. Provide motivation, direction in carrying out work.
- f. Encouraging a culture of compliance with GCG and Company Policies.
- g. Make corrections or reprimands to subordinates constructively, fairly and without breaking the spirit of the work concerned.
- h. Respond to every report received regarding disciplinary violations and follow up in a fair and transparent manner in accordance with Company Regulations.
- i. Avoid intimidation or pressure, humiliation and harassment of subordinates.
- j. Provide protection for employees who report suspected irregularities.
- k. Encouraging the improvement of the performance of subordinates in the

framework of leader regeneration.

## **2. Behavior of subordinates towards leaders**

- a. Obey superiors' orders with full responsibility.
- b. Be polite and respectful towards superiors.
- c. Provide useful input and suggestions to superiors.
- d. Express opinions and discuss each job with superiors in a polite manner.
- e. Ask your superior for permission if there is a need or interest, either for the Company or personal interests, during working hours.
- f. Inform the superior if there are indications of deviation.
- g. Do not take actions outside of the authority;
- h. Support and assist in achieving superior performance targets

## **3. Behavior as a Coworker**

- a. Remind each other to complete work on time and not delay work.
- b. Receive input and suggestions from fellow co-workers for performance improvement.
- c. Sharing knowledge with co-workers.
- d. Solve problems by focusing on the core and finding solutions.
- e. Maintain polite and courteous behavior in interacting with co-workers both inside and outside of work.
- f. Respect others, do not belittle and do not discriminate in employment relationships.
- g. Mutual respect and respect for the opinions of others, and can accept differences of opinion well.
- h. Avoid actions and words that contain elements of intimidation, harassment, humiliation, ridicule, slander and demeaning fellow co-workers.
- i. Work together with dedication and trust to achieve a common goal.

## **4. Intellectual Property Rights**

- a. The Company must respect the intellectual property rights created by employees.
- b. The Company provides recognition and awards for the innovation work of employees.
- c. Impack Personnel who participate/work in the development of a process or product that will be used by the Company, or Impack Personnel who have rights to the work must treat the information related to the process or product as property of the Company both during the working period and after the Impack Personnel no longer work for the Company.

- d. All Impact Personnel must inform the work they produce both during and outside working hours, if the work is related to the Company's business or operations.
- e. Innovation works that have been owned by the Company cannot be reclaimed as the property of employees even though they have not been registered as Intellectual Rights of the Company.

## **D. ETHICS OF HUMAN BEHAVIOR**

### **Company Personnel Commitment**

In order to increase the credibility and trust of the Company, all Impact Personnel are committed to:

1. Always think and behave in a corporate and non-sectoral manner by prioritizing the interests of the Company over personal and or group interests to provide added value for the Company.
2. Carry out duties professionally with full responsibility and uphold integrity, honesty and the spirit of togetherness.
3. Cares and is responsive to complaints/inputs from stakeholders and immediately follows up on them in accordance with applicable regulations in the Company.
4. Work hard and try to find the best way to complete tasks effectively and efficiently.
5. Have a strong motivation to develop themselves in order to improve competence and expand knowledge
6. Comply with all provisions and values of the Company to maintain and maintain the image of the Company.
7. Create and understand work plans / work targets in accordance with the scope of work.
8. Considering every risk involved in carrying out each assignment.

### **Keeping the Company's Good Name**

In order to maintain the good name of the Company, every Impact Personnel is required to:

1. Maintain polite and courteous behavior both inside and outside of work.
2. Avoid actions that are contrary to religious norms, laws and ethics of morality, including consuming, distributing and selling things related to narcotics, other illegal drugs, liquor and gambling in any form.



3. Not doing things that can reduce the honor or dignity of the Company.
4. Avoid entering places that can defame the honor or dignity of the Company.
5. Avoid actions that have the potential to violate applicable laws and regulations.

### **Protecting Company Information (Intangible Assets)**

Every Impack Personnel, in accordance with their authority and scope of work, has access to Company information, both general and confidential. In this regard, Impack Personnel are responsible for:

1. Protecting the Company's confidential information both while still actively working or not working or not having a cooperative relationship with the Company in accordance with the applicable laws and regulations.
2. Use Company information, both general and specific, only for the benefit of the Company.
3. Dissemination of confidential information either orally or in writing to other parties in the form of individuals, companies, associations, or other legal entities is carried out by officials appointed by the Company.

### **Maintain and use Company Assets**

Assets are resources owned by the Company to be used in an effort to achieve the Company's goals. Protection and use of Assets is part of the effort to maintain the continuity of the Company's business, for that every Impack Personnel is required to:

1. Using the Company's assets to carry out the Company's operations effectively and efficiently in accordance with applicable regulations.
2. Protect, maintain, secure, and save the Company's assets in accordance with applicable regulations, including not lending, selling, mortgaging and leasing.
3. Using the Company's assets according to the position, authority and scope of work being carried out.

### **Insider Information (Insider Trading)**

Impack personnel who have access to material information may not abuse their position and work in disclosing material information:

1. Which can influence the decision of investors to buy, sell or hold shares of the Company.
2. To people who have special relationships to carry out trade transactions in goods/services to the Company.

### **Giving and/or receiving Gifts, Meals, Entertainment and Donations**

The behavior of Impack Personnel related to the giving and/or receiving of gifts:

1. It is not allowed to accept and/or give gifts, souvenirs, business meals or other facilities, which can influence decision making and violate applicable regulations.
2. Prizes received in connection with sweepstakes held by third parties related to the Company are submitted and recorded as assets of the Company.
3. Holding a Business Dinner with Business Partners and/or Stakeholders as long as it is intended for the benefit of the Company, at a cost that can be accounted for and within reasonable limits in a place that does not create a negative image of the Company.
4. Submitting/receiving Gifts and/or Souvenirs from third parties whose activities are financed by the Company, must become the property of the Company.
5. All expenses related to the giving of Gifts, Souvenirs and Business Entertainment must be authorized by an authorized official of the Company.
6. It is forbidden to accept/give bribes or promise to give/accept bribes.
7. It is prohibited to direct other people outside the Company to bribe Impack Personnel in conducting business activities within the Company and outside the Company.
8. It is prohibited to give/offer directly or indirectly a gift or other improper payment to other parties outside the Company to obtain benefits or preferential treatment in conducting the Company's business transactions.
9. In principle, donations are given to outside parties as long as they are in accordance with the Company's policies, appropriateness limits, for social purposes, such as donations for natural disasters.

### **E. TRAINING & AWARENESS**

**Impack Pratama provides employees with ongoing training and awareness programs regarding ethical standards at least once a year. We promote ethical awareness through internal communications. Employees are empowered to make ethical decisions and understand their role in upholding our values.**