

PROCUREMENT POLICY (SUPPLIERS CODE OF CONDUCT)

Legal Basis

1. Guidelines for the Implementation of Good Corporate Governance.
2. Company Code of Ethics.

Our Faith

As a form of our commitment to continue to maintain the trust of all stakeholders and implement noble values in business, we adhere to the Supplier Code of Ethics in procuring goods and/or services within PT Impack Pratama Industri Tbk and its subsidiaries in accordance with principles of good corporate governance.

We believe that the procurement process for goods/services at the Impack company can run effectively, efficiently and transparently if our business relationships with all suppliers are built on the basis of trust, mutual respect and commitment to the following values:

1. Compliance with Laws.
2. Ethical behavior and integrity.
3. Responsible for product quality.
4. Respect human rights and employment.
5. Concern and responsibility for environmental sustainability.

1. Legal Compliance

Impack expects each Supplier to comply with the applicable laws and regulations in the respective countries where it operates. Suppliers are expected to conduct business practices with production or service standards set by the competent authority, including obtaining and maintaining required permits for Supplier's business activities.

2. Business Ethics and Integrity

Suppliers of the Impack company are expected to behave ethically and with integrity in the procurement of goods/services. Therefore, the Supplier:

- i. Must prioritize honesty and compete fairly.
- ii. It is prohibited to promise, give or receive gifts in any form with the aim of influencing decisions, to or from employees or management of the Impack company.
- iii. Avoiding conflicts of interest with employees or management of the Impack company which is reasonably suspected of causing corruption, collusion and

nepotism.

- iv. Must maintain the confidentiality of information belonging to the Impack company, by not reproducing, duplicating, or distributing in any way and form any information and data, including but not limited to technical information, financial information, production processes, or business secrets belonging to the Impack company.
- v. Respect Impack's intellectual property rights and not apply for Impack's intellectual property rights, including those relating to brands, copyrights, patents, designs, production processes, technical know-how, methodologies, and Impack's company business secrets.

3. Responsibility for Quality

Suppliers must provide goods/services in accordance with quality standards/specifications, price, delivery, and service (Quality Cost Delivery and Services (“QCDS”)) of the Impack company.

Each prospective Supplier will go through a fair and objective selection process. After that, each supplier will be evaluated regularly by the Impack company with QCDS standards.

To ensure compliance with the quality standards of goods/services, the Supplier must allow the Impack company to carry out quality audits of the facilities, systems, and/or documents related to the goods/services provided. For this reason, the Supplier is required to store and provide accurate and transparent information related to the procurement of goods/services, including tender documents and payment information, as well as to provide responses and corrective actions requested from the results of the quality audit.

4. Human Rights and Employment

Suppliers are expected to respect Human Rights and care for the health, safety and welfare of employees.

- a. **Maximum Working Hours: Suppliers must ensure that working hours comply with applicable laws and industry standards. Employees should not be required to work more than the maximum daily and weekly working hours established by local regulations, with appropriate breaks provided.**
- b. **Non-Discrimination: Suppliers must provide equal opportunity and fair treatment to all employees without regard to race, color, sex, religion, age, disability, marital status, sexual orientation, or any legally protected characteristic.**

- c. **Prohibition of Child Labor:** Suppliers are prohibited from employing children under the minimum age required by law. The Supplier must ensure that no child labor is employed in the Supplier's work environment.
- d. **Forced Labor & Human Trafficking:** Suppliers shall not use forced, bonded, or unwanted voluntary labor. All work must be voluntary, and workers must not be required to submit government-issued identification, pay a deposit, or work under threat or coercion.
- e. **Corporal Punishment & Disciplinary Practices:** Physical torture, threats of physical torture, or other forms of harsh or inhumane treatment as disciplinary measures are prohibited. Disciplinary actions must be implemented in a manner that respects individual dignity in accordance with local laws and regulations.
- f. **Health & Safety:** Suppliers must provide a safe and healthy work environment for all employees. This includes implementing measures to prevent accidents and health injuries related to or occurring in the course of work activities.
- g. **Providing a Living Minimum Wage:** Suppliers must pay employees sufficient wages to meet basic needs.
- h. **Freedom of Association & Right to Bargain Collectively:** Suppliers must recognize and respect the right of employees to join or form a union to bargain collectively. They must not interfere with the exercise of this right and must ensure that any restrictions comply with national law.
- i. **Provision of Decent Living Conditions:** Suppliers must ensure that employees provided with accommodation by the company have adequate living conditions. Accommodations must meet safety, cleanliness and comfort standards consistent with local laws and industry standards.

5. Environmental Responsibility

Suppliers are expected to run their business in a sustainable and environmentally responsible manner by preventing environmental pollution around their business areas.

6. Supplier Selection and Evaluation

a. Supplier Selection

- Determine several potential suppliers for the types of goods/services required by the Company. If you only have 1 (one) potential supplier, you must provide an explanation to the Company's Management.

- Receive information and documents from each potential supplier.
- Reviewing information and documents of prospective suppliers based on the Company's QCDS criteria.
- Request sustainability data, especially from the main suppliers
- Appointment of the Company's suppliers.

b. Supplier Evaluation

- For the provision of Main and Supporting Raw Materials used throughout the group, they must pass the test and have been approved by the Impack Pratama Group IRIC (Impack Research & Innovative Center) Team to proceed to the next process.
- The suppliers of Impack Pratama Group will be evaluated periodically to ensure and know the performance of each supplier and the overall implementation of this evaluation follows ISO 9001-2015 standard procedures.
- Conduct regular meetings with the main suppliers in the field of sustainability.

7. Integrity Pact

The Impack Company will seek further commitment from the Supplier through an [Integrity Pact](#).

8. Monitoring

We expect any party who becomes aware of a violation of this Supplier Code of Conduct to report to:

Whistleblowing Team of PT Impack Pratama Industri Tbk.:

Email: whistleblower@impack-pratama.com

The informant's information will be kept confidential and the Impack company will follow up the handling of the violation report in accordance with the mechanisms and applicable laws and regulations.