

KEMAS PKG BUSINESS CODE OF CONDUCT

Introduction

At KEMAS PKG, we believe that trust is the foundation of our success. The trust of our customers, employees, business partners, and the public is our most valuable asset. This trust has been earned through years of dedication to quality, integrity, and ethical business practices. However, trust is not permanent—it must be earned every day through our actions and decisions.

The KEMAS PKG Business Code of Conduct serves as a guide for all employees, managers, and stakeholders. It outlines the principles and standards that govern how we work together, how we interact with our business partners, and how we conduct ourselves in the global marketplace. This Code is not just a set of rules; it reflects the values that define KEMAS PKG and encourages everyone to act responsibly, ethically, and in compliance with the law.

By adhering to this Code, we ensure the long-term success of KEMAS PKG, protect our reputation, and contribute to a sustainable future. Every employee, manager, and stakeholder is expected to uphold these principles and seek guidance when faced with ethical dilemmas. Together, we can foster a culture of respect, collaboration, and accountability.

Vision and Mission

Vision

To become a globally recognized leader in packaging, renowned for excellence, innovation, and empowering clients while contributing to the well-being of communities worldwide.

Mission

KEMAS PKG is dedicated to providing innovative, high-quality packaging solutions for the cosmetic and medical industries, with a strong focus on safety, sustainability, and customer satisfaction.

Our Values

At KEMAS PKG, our values are the foundation of everything we do. They guide our decisions, shape our culture, and define our relationships with employees, customers, and partners. These values include:

1. **Integrity:** We act honestly and transparently in all our business dealings.
2. **Respect:** We treat everyone with dignity, fairness, and respect, regardless of their background or position.
3. **Sustainability:** We are committed to protecting the environment and promoting sustainable practices in all aspects of our operations.

4. Innovation: We strive for continuous improvement and embrace new ideas to deliver the best solutions for our customers.
 5. Accountability: We take responsibility for our actions and their impact on our stakeholders and the environment.
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BUSINESS OPERATIONAL HUMAN RESOURCE ACTIVITIES

Respect and Inclusion

At KEMAS PKG, we are committed to fostering a workplace culture that values diversity, inclusion, and mutual respect. We believe that every individual has the right to work in an environment free from discrimination, harassment, or intimidation. Specifically:

- We do not tolerate discrimination based on race, gender, age, religion, ethnicity, disability, sexual orientation, or any other personal characteristic.
- We promote equal opportunities for all employees and encourage diversity as a source of strength and innovation.
- We respect the rights of employees to freedom of association and collective bargaining, in accordance with local laws.

Fair Employment Practices

- All employees are provided with clear terms of employment, including working hours, wages, and benefits, in compliance with applicable laws.
- We ensure that all employees are compensated fairly and at least meet the minimum wage requirements.
- We are committed to the abolition of child labor and forced labor. No employee is subjected to coercion, intimidation, or exploitation.

Health, Safety, and Well-Being

The health and safety of our employees are our top priorities. We are committed to:

- Providing a safe and healthy work environment that complies with all applicable laws and regulations.
 - Conducting regular risk assessments and implementing measures to prevent workplace accidents and injuries.
 - Offering programs and resources to support the physical and mental well-being of our employees.
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Our Business Activities

Avoiding Conflicts of Interest

At KEMAS PKG, we make business decisions based on the best interests of the company. Employees and managers must avoid situations where personal interests could conflict with their professional responsibilities. Examples of potential conflicts include:

- Hiring or promoting family members or close friends.
- Engaging in business relationships with suppliers or partners for personal gain.
- Accepting gifts or favors that could influence business decisions.

If a conflict of interest arises, it must be disclosed to a supervisor or the Compliance Department.

Anti-Corruption and Fair Competition

We are committed to conducting business with integrity and in compliance with all applicable anti-corruption and competition laws. Specifically:

- We do not tolerate bribery, kickbacks, or any form of corruption.
- We compete fairly and do not engage in practices such as price-fixing, market allocation, or abuse of market power.
- We ensure that all business transactions are transparent and properly documented.

Social Responsibility

As a responsible corporate citizen, KEMAS PKG is committed to supporting the communities in which we operate. We contribute to charitable, cultural, and educational initiatives and encourage employees to engage in voluntary work. However, all such activities must align with our values and not conflict with our business interests.

Protecting Company Assets

Confidentiality and Data Protection

We safeguard the confidentiality of sensitive information, including trade secrets, customer data, and employee records. Employees are required to:

- Handle confidential information responsibly and only share it with authorized individuals.
- Comply with data protection laws and company policies to ensure the security of personal and business data.

Intellectual Property

KEMAS PKG's intellectual property, including patents, trademarks, and proprietary technologies, is a valuable asset. Employees must:

- Protect the company's intellectual property from unauthorized use or disclosure.
- Respect the intellectual property rights of others and avoid infringement.
- Employees must protect sensitive company information, including trade secrets, customer data, and intellectual property.
- We comply with data protection laws and company policies to ensure the security of personal and business data.

Use of Company Resources

Company resources, including equipment, facilities, and technology, must be used responsibly and for legitimate business purposes. Personal use of company resources is permitted only with prior approval and must not interfere with work responsibilities.

Environmental Responsibility

KEMAS PKG is committed to minimizing its environmental impact and promoting sustainable practices. We:

- Comply with all environmental laws and regulations.
- Implement measures to reduce waste, conserve energy, and prevent pollution.
- Develop innovative solutions to promote recycling and sustainable packaging.

Employees are encouraged to contribute to environmental initiatives and report any violations of environmental policies.

Compliance and Reporting

Compliance with Laws and Regulations

All employees, managers, and stakeholders are required to comply with applicable laws, regulations, and company policies. Violations of these laws can result in serious consequences for both the individual and the company.

Reporting Misconduct

KEMAS PKG encourages employees to report any violations of the Code of Conduct, company policies, or applicable laws. Reports can be made confidentially to the Compliance Department or through the company's whistleblower hotline. Retaliation against whistleblowers is strictly prohibited.

Consequences of Violations

Violations of the Code of Conduct may result in disciplinary action, including termination of employment and legal consequences. The severity of the action will depend on the nature and impact of the violation.

Conclusion

The KEMAS PKG Business Code of Conduct is a reflection of our commitment to ethical excellence, sustainability, and respect for all stakeholders. By adhering to this Code, we ensure the long-term success of our company and contribute to a better future for our employees, customers, and communities.

KEMAS PKG LEGAL FOUNDATION AND REGULATORY COMPLIANCE

Foundational Legal Framework

This Business Code of Conduct is explicitly anchored in the following Indonesian legal instruments:

1. Constitutional and Fundamental Laws

- Undang-Undang Dasar 1945 (Indonesian Constitution)
- Kitab Undang-Undang Hukum Perdata (Civil Law Code)
- Kitab Undang-Undang Hukum Pidana (Criminal Law Code)

2. Corporate and Business Regulations

- Undang-Undang No. 40 Tahun 2007 tentang Perseroan Terbatas (Limited Liability Company Law)
- Undang-Undang No. 5 Tahun 1999 tentang Larangan Praktek Monopoli dan Persaingan Usaha Tidak Sehat (Anti-Monopoly and Unfair Competition Law)
- Peraturan Pemerintah No. 24 Tahun 2018 tentang Pelayanan Perizinan Berusaha Terintegrasi Secara Elektronik (Electronic Integrated Business Licensing Service Regulation)

Specific Compliance Provisions

Labor and Employment Compliance

- Undang-Undang No. 13 Tahun 2003 tentang Ketenagakerjaan (Manpower Law)
 - Provisions on:
 - Worker rights
 - Employment conditions
 - Minimum wage standards
 - Workplace safety
 - Non-discrimination principles

Anti-Corruption Legal Framework

- Undang-Undang No. 31 Tahun 1999 jo Undang-Undang No. 20 Tahun 2001 tentang Pemberantasan Tindak Pidana Korupsi (Corruption Eradication Law)
 - Specific focus on:
 - Definition of corruption
 - Prohibited practices
 - Penalties for corporate and individual misconduct
 - Whistleblower protections

Environmental Compliance

- Undang-Undang No. 32 Tahun 2009 tentang Perlindungan dan Pengelolaan Lingkungan Hidup (Environmental Protection and Management Law)
 - Mandatory provisions for:
 - Environmental impact assessments
 - Waste management

- Pollution prevention
- Corporate environmental responsibility

Intellectual Property Protection

- Undang-Undang No. 28 Tahun 2014 tentang Hak Cipta (Copyright Law)
- Undang-Undang No. 13 Tahun 2016 tentang Paten (Patent Law)
- Undang-Undang No. 20 Tahun 2016 tentang Merek dan Indikasi Geografis (Trademark and Geographical Indication Law)

Data Protection and Privacy

- Undang-Undang No. 11 Tahun 2008 tentang Informasi dan Transaksi Elektronik (Electronic Information and Transactions Law)
- Peraturan Pemerintah No. 71 Tahun 2019 tentang Penyelenggaraan Sistem dan Transaksi Elektronik (Electronic Systems and Transactions Regulation)

Export-Import Regulations

- Undang-Undang No. 17 Tahun 2006 tentang Kepabeanan (Customs Law)
- Peraturan Pemerintah No. 85 Tahun 2015 tentang Pemberlakuan Standar Nasional Indonesia (Implementation of National Indonesian Standards)

Dispute Resolution

Legal Jurisdiction

- All disputes arising from this Code of Conduct shall be:
 - First addressed through internal mediation
 - Subject to Indonesian legal jurisdiction
 - Resolved through:
 - Musyawarah (deliberation)
 - Arbitration
 - District Court proceedings in Jakarta

Compliance Mechanism

Reporting and Enforcement

- Internal reporting mechanisms aligned with:
 - Whistleblower protections
 - Confidentiality guarantees
 - Fair investigation procedures

Penalties for Non-Compliance

Violations may result in:

- Administrative sanctions
- Civil liability
- Criminal prosecution
- Potential business license revocation

Periodic Review

This legal framework shall be:

- Reviewed annually
- Updated to reflect current Indonesian regulatory landscape
- Aligned with emerging legal standards
- Communicated transparently to all stakeholders