

PT. KEMAS INDAH MAJU STATEMENT

At PT Kemas Indah Maju (PT. KIM), hereinafter referred to as "the Company," operating with unwavering integrity is the cornerstone of our business ethics. This Business Ethics Policy serves as a guide to help us navigate ethical challenges in an increasingly complex global environment and reaffirms our commitment to the highest standards of honesty, transparency, accountability, and mutual respect.

While our business practices and development strategies may evolve over time, our dedication to ethical conduct remains constant. We firmly believe that conducting our operations with integrity is critical to our success and sustainability. This policy is a public declaration of our commitment to uphold these values in everything we do.

We recognize, however, that no single policy can anticipate or address every situation. In many instances, common sense, sound moral judgment, and adherence to our core values will serve as the best guide. When in doubt, we encourage all employees and stakeholders to seek clarification or report concerns through the available channels.

Guidance and Reporting Channels

If you have questions, concerns, or require guidance regarding this policy or any ethical issue, you are encouraged to reach out through the following channels:

- Email: wbs@kemas.co.id
- Online Form: <http://www.kemaspkg.com/wbs>
- WhatsApp: (+62) 817 933 39777
- Landline: (+62 21) 4608847 (during working hours)

PLEASE NOTE:

Every action taken on behalf of the Company reflects directly on its reputation for honesty and integrity. Employees, representatives, and stakeholders are entrusted with the responsibility to uphold the Company's values and ethical standards in all business dealings.

It is important to note that only authorized individuals with the proper power of attorney or official delegation are permitted to act on behalf of the Company. Furthermore, any individual who falsely claims to represent the Company, or makes statements, commitments, or claims on behalf of the Company that are not aligned with its values, policies, or official positions, is committing a serious violation of the law.

These actions undermine the Company's integrity, erode trust with stakeholders, and damage its reputation, potentially causing significant harm to its operations and relationships. Such misconduct is considered a grave offense and may constitute violations of Indonesian law, including but not limited to:

- Pasal 378 of the Indonesian Penal Code (KUHP): Fraud (Penipuan), which carries a maximum punishment of 4 years imprisonment.
- Pasal 155 of the Law on Limited Liability Companies (UUPT): Misrepresentation or unauthorized actions on behalf of a company, which may result in civil and criminal liability.

The Company will not hesitate to pursue legal action against individuals or entities engaging in these activities. This includes reporting violations to the appropriate authorities and seeking the maximum penalties allowed under the law.

BUSINESS ETHIC POLICY

Operating with Integrity:

Our Commitment to Ethical Business Practices

PT. KEMAS INDAH MAJU

2025

PART ONE: INTRODUCTION

Why a Code of Business Ethics?

This Code was developed to consolidate the ethical expectations of all the Company stakeholders such as employees and union including government and buyers worldwide. We have synthesized and summarized most of the rules, regulations and policies that influence how we must behave with each other, and with our partners, suppliers, employees, government, and the public, to uphold ethical business principles and protect company's reputation as a trustworthy organization.

The primary purpose of this Code is multifaceted and comprehensive. It aims to promote, strengthen, and support an ethical culture throughout the Company, underscore the Company's commitment to the highest standards of integrity, and help Company employees make ethical decisions both in the context of work and in relation to other parties, as well as in personal interactions outside of work.

The fundamental expectation is that all employees will operate with integrity – unwavering integrity. This means maintaining the highest standards of ethical conduct in every aspect of their professional and personal interactions.

Scope of Application

Every EMPLOYEE (regardless of rank or level), consultant, service contractor, and intern are expected to comply with this Code while working for the Company. This Code of Business Ethics identifies the ethical standards expected of all who work for the Company.

It is our intention that all personnel abide by the spirit and intent of this Code as well as the specific policies and rules that may apply in each situation. This comprehensive approach ensures that our ethical standards are not just a set of rules, but a fundamental part of our organizational culture.

Fundamental Ethical Principles

It is fundamental that our personnel discharge their duties with independence, honesty, impartiality, and incorruptibility. The long-term success of the Company and its missions depends on maintaining the respect and confidence of stakeholders around the world. As the Company is judged by the conduct of its personnel, each one of us is bound to act ethically in every way, every day.

The obligation to do what's right must be an essential part of the Company character and underscore everything we do. When taking decisions, we must, regardless of who is present at the time, be guided by a culture that reinforces making the appropriate, ethical choice.

Company Values

The Company has adopted six values that define the overall expectations for organizational behavior:

1. Integrity
2. Transparency
3. Mutual respect
4. Professionalism
5. Accountability
6. Principled Performance

The purpose of these values is to create a unified culture that supports the Company vision to achieve the Sustainable Development Goals (SDGs) through ethical practices.

Foundational Ethical Commitments

This Code of Business Ethics is substantially based on SDG's values, together with the following key aspects as stated in separate policies:

1. **Law & Regulation Compliance:** The Company adheres to laws and regulations where the Company facilities are established, in terms of legal entity, operation, and practices.
2. **Forced Labor:** The Company forbids any forms, practices, and mindset of forced labor such as physical, emotional, and psychological forces towards every employee, regardless of hiring status and authority level.
3. **Wage and Benefit:** The Company compensates employees financially for regular working hours, overtime hours, public holidays (except weekends), as well as statutory leaves in accordance with applicable laws and regulations.
4. **Working Hours:** The Company respects employees' rights to proper breaks, family interaction, and social engagement. The maximum working hours are limited to 6 working days per week, with a maximum of 4 overtime hours per day and 18 overtime hours per week.
5. **Freedom of Association:** The company does not forbid or hinder employees' rights to form or join unions at company, provincial, or national levels. Union caretakers are allowed to perform their functions through internal training, meetings, and attending government or ILO-related invitations.

6. **Child Labor:** The Company recognizes children's rights to protection against exploitation, ensuring their physical, emotional, and psychological well-being, and preserving their opportunities for proper education.
7. **Discrimination:** The Company does not discriminate based on any factor other than an individual's capability to perform a job. This applies to human resources practices, payroll, promotions, training, and business relations.
8. **Harassment and Abuse:** The Company forbids any form of harassment, abuse, psychological, or physical force. Employees are trained periodically, and whistleblowers are encouraged and protected.
9. **Occupational Health & Safety:** The Company follows national and local laws to ensure the health and safety of employees and visitors. A safety culture is a long-term goal, with zero accidents as the short-term objective.
10. **Environmental Protection:** The Company is committed to environmental protection through initiatives like ISCC certification, ISO 2200 environmental management, and emission tracking and reduction.
11. **Bribery & Corruption:** These matters are considered a primary core of ethical behavior for all employees in all interactions.

PART TWO: ETHICAL CONDUCT

In working for the Company, each employee represents the ideals of the Company culture and values and must seek to protect the best interests of the Company, rather than those of individual or other personal or political interests. Each employee must act with loyalty to the Company, and not seek or take instructions from unauthorized entities or persons. Independence, fairness, and objectivity are core Company values that must be integrated into conducting one's duties.

Every employee must uphold and promote the highest standards of ethical and professional conduct, carrying out their duties with honesty, integrity, and professionalism. The expectation is to strive to be a model of the behavior you want to see in others in the workplace, leading by example regardless of location. Each employee, as well as the Company as a legal entity, has an obligation to comply with these fundamental principles.

Conflict of Interest

A conflict of interest is a situation in which one's personal interests clash, or appear to clash, with the interests of the Company. Each employee, regardless of hiring status and authority level, has an obligation to avoid such situations. It is important to understand that a conflict of interest does not necessarily mean you have done anything wrong - only that your objectivity might be questioned.

When a potential or actual conflict of interest arises, it may be perceived that you have a personal bias that makes it difficult to maintain impartiality. This perception can undermine public confidence in the Company. It is critical to avoid conflicts of interest, or even the appearance of a conflict, between personal interests and professional responsibilities.

Specific Ethical Guidelines

A. Gifts, Awards, and Payments

Gifts, awards, entertainment, hospitality, and similar offerings are sensitive ethical issues that require careful consideration. Receiving gifts or benefits in connection with work can appear to create an obligation to the giver, potentially damaging the Company's reputation by calling into question your independence, impartiality, and integrity. Similarly, giving gifts or entertainment can lead to negative inferences of seeking undue benefits.

The fundamental principle is to maintain absolute transparency and avoid any situation that could be interpreted as an attempt to influence business decisions. Employees should be

cautious about accepting or offering any form of gift that could compromise their professional judgment or the Company's interests.

B. Outside Employment, External Activities, and Board Positions

While working for the Company, each employee is expected to devote full time and attention to their duties and responsibilities. Employees cannot undertake any outside work or activities that may interfere with their ability to carry out their role at the Company. This interference can be in terms of time, energy, or potential incompatibility with the Company's interests.

Any external professional activities must be carefully evaluated to ensure they do not conflict with the employee's primary responsibilities or create potential conflicts of interest. Employees are required to seek prior approval for any external professional engagements and must prioritize their commitment to the Company.

C. Political Activity

The Company supports employees' right to vote and encourages political participation. We respect individual political and religious convictions and do not seek to limit personal freedoms. Employees are permitted to belong to political parties, with an important caveat: such membership must not entail actions or obligations inconsistent with the independence and impartiality required by their employment status.

Specifically, involvement with groups that advocate violence, promote discriminatory ideologies, or could potentially reflect adversely on the Company's reputation is strictly prohibited. The key is to maintain a clear separation between personal political beliefs and professional responsibilities.

D. Financial Interests and Disclosure

Employees should not have any financial interests that may profit, or appear to benefit from, their work with the Company. To ensure transparency and prevent potential conflicts, the Company requires all job candidates, regardless of level, to complete a pre-hire conflict of interest disclosure form. This form provides detailed information about relationships and financial interests, allowing the Company to implement necessary controls before employment begins.

The goal is to prevent potential conflicts of interest from developing into actual conflicts that could compromise the employee's objectivity or the Company's integrity. Full disclosure and ongoing transparency are essential to maintaining trust and ethical standards.

Resource Management

While working, employees will have access to numerous Company assets and resources, including monetary funds, computer systems, telephones, supplies, vehicles, and more. Each employee is responsible for the appropriate use and protection of these assets. This means using property and resources wisely and exclusively for the benefit of the Company, preventing waste or misuse.

It is crucial to understand that assets are not limited to physical items. Intangible assets such as time, information, and technology are equally important and must be managed with the same level of care and respect. Employees are stewards of the Company's resources and must treat them with the utmost responsibility and integrity.

PART THREE: OBLIGATIONS AND CONSEQUENCES

A. Duty to Comply

As the Company operates under Indonesian laws, rules, and regulations, it has established policies, administrative instructions, and standards to govern our behavior. If you are uncertain about what to do or whether a specific rule or policy applies to you, it is essential to seek guidance from your manager, the Office of Human Resources, the Legal Office, or the Ethics Office.

You are obligated to follow the rules and policies, even if others, including management, do not. Remember that each of us is responsible for our own actions. If you are asked to do something that you know or believe violates a rule or policy, you are required to refuse.

B. Obligations at Every Level

All employees are bound by the same ethical standards of the organization. However, leaders have a special obligation to embody and promote these standards among their staff and colleagues. They must embrace role model behaviors and set the "tone at the top." This responsibility extends to mid-level managers, who are in close contact with personnel and are integral to delivering the products and services we provide.

Managers and supervisors are expected to offer advice and guidance, support ethical conduct, and foster a culture where employees feel free to raise concerns, ask questions, and make suggestions without fear of reprisal or retaliation. Additionally, managers must be diligent in not delegating discretionary authority to individuals who exhibit questionable judgment or may engage in unethical or illegal activities.

Integrity means doing the right thing, even when no one is watching. We expect all personnel to be honest and engage in appropriate ethical behavior. Practically speaking, if you do something wrong, you are likely to be caught. Violations of rules, regulations, policies, or local laws may result in disciplinary actions, including demotion, loss of privileges, summary dismissal, or termination of your contract. In severe cases, violations may even lead to referral to local authorities for potential criminal prosecution.

C. Duty to Report

If you see something, say something. Management must maintain an open-door culture where employees can approach them with any concerns without fear of punishment. You have an obligation to report suspected misconduct without fear of reprisal or retaliation.

You can speak to your manager, or if you are uncomfortable doing so, you may approach another manager. The Office of Audit and Investigations provides various channels for reporting, including email, landlines, and mobile phone options. Employees who report wrongdoing have the option to remain anonymous, except in cases of workplace harassment or abuse, where the victim must identify themselves.

For confidential advice and guidance, you can contact the Ethics Service via:

1. Email: budi@kemas.co.id
2. Private telephone: 085939624404
3. Written reports can be submitted in the suggestion box provided.

We are committed to protecting employees who submit reports.

D. Protection from Retaliation

The Company actively promotes "whistleblowing," encouraging employees to come forward and raise good faith concerns regarding possible misconduct, fraud, corruption, harassment, abuse of authority, discrimination, or other wrongdoing. We support an open environment where such reporting is viewed positively, as it protects the best interests of the organization.

You are encouraged to make good faith reports of wrongdoing without fear of retaliation. You cannot be punished for fulfilling this obligation. Leaders are advised to foster a speak-up culture where employees feel comfortable bringing their concerns to light. Under the Company's Policy for Protection against Retaliation, the Ethics Office is empowered to protect staff, contractors, and interns from retaliation for good faith reporting or for cooperating with authorized audits or investigations. Remember, retaliation itself is considered misconduct.

For more information about the Whistleblower System (WBS), please visit www.kemaspkg.com/wbs.

Reporting Channels:

- **Website WBS:** <https://www.kemaspkg.com/wbs>
- **Google Form WBS:** [Link to Form](#)
- **Email WBS:** wbs@kemas.co.id
- **Hotline WBS:** 0817-9333-9777 (WhatsApp)
- **Written Reports:** Submit to the WBS Team (Iis/Gabriel) or drop at security.
- **Google Form:** QR Code available.

Information to Include in Reports:

- Identity of the reporter (optional)
- Parties involved
- Type of violation
- Time and location of the incident
- Chronology of events
- Supporting evidence

PART FOUR: ETHICAL DECISION-MAKING

Human beings often face real-life decisions that require discretion and judgment. While we are generally expected to follow established rules, there are times when we may be unsure of their applicability or confronted with unique circumstances. When faced with an ethical dilemma, consider the following questions:

- What are the relevant facts? Identify the key issues and determine who may be affected by your decision.
- Are there specific rules or guidelines for this situation? Ensure that your actions comply with these standards.
- Do you possess information that should cause you to question your intended actions? Reflect on any potential red flags.
- Will my decision reflect positively on the Company in the eyes of society, government, suppliers, buyers, and investors? Consider the broader implications of your choice.
- How would I feel if my decision were to appear on the front page of tomorrow's newspaper or circulate on social media? Think about the potential public perception.
- Do I need assistance in deciding what to do? Don't hesitate to seek guidance if you are uncertain.

Whistleblower System (WBS): Supporting Integrity and Ethical Practices

The **Whistleblower System (WBS)** serves as an independent, confidential, impartial, and professional resource for all personnel, regardless of location. It is designed to promote an organizational culture that values honesty, integrity, accountability, transparency, and mutual respect.

Services Offered by the Whistleblower System (WBS)

The WBS provides five key lines of service to support ethical practices and address concerns:

1. **Confidential Ethics Advice:** Offering practical guidance on ethical dilemmas and misconduct.
2. **Ethics Awareness and Education:** Promoting initiatives focused on ethics, values, and standards within the organization.
3. **Protection Against Retaliation:** Supporting whistleblowing efforts and safeguarding individuals who report misconduct or unethical behavior.
4. **Conflict of Interest Management:** Addressing potential conflicts of interest and ensuring transparency in financial and operational matters.

5. **Standards Development:** Clarifying and consulting on ethical standards, policies, and principles to ensure alignment with the Company's values.

How to Access the Whistleblower System (WBS)

For assistance or to report concerns, you can reach the WBS through the following channels:

- **WBS Website:** www.kemaspkg.com/wbs
- **Google Form:** [Link to Form]
- **Email:** wbs@kemas.co.id
- **Hotline (WhatsApp):** 0817-9333-9777

The WBS ensures that all reports are handled with the utmost confidentiality and professionalism, fostering a safe environment for employees and stakeholders to voice concerns and uphold the Company's commitment to ethical excellence.