

SUPPLIER CODE OF CONDUCT

FOREWORD

PT Kemas Indah Maju, including but not limited to all subsidiaries and affiliates (hereafter termed “KEMAS PKG”), is committed to the highest standards of ethics and integrity and aims to create an impact for a better world and a better future. In doing so, KEMAS PKG has established a Business Code of Conduct (“BCoC”) as the company standard for ethical business practices and regulatory compliance. This standard applies to all KEMAS PKG employees, directors, and officers worldwide.

Similar to our BCoC, this Supplier Code of Conduct (“SCoC” or the “Code”) further outlines the values and principles we expect from all our suppliers, contractors, consultants, agents, distributors, intermediaries, and other business partners, along with their employees, parent entities, subsidiaries, and subcontractors (collectively referred to as “Suppliers”) to adhere to.

KEMAS PKG expects all business partners we engage with to share similar values and principles of the highest business ethics and compliance. For this reason, KEMAS PKG expects all Suppliers to commit to achieving these shared values. Accordingly, by engaging with us and/or accepting this Code, Suppliers are obligated to adhere to and comply with the provisions contained herein and are responsible for educating their people accordingly.

Waivers and Modifications of Rules

This Code is not intended to be an exhaustive list nor purposely to replace any contract agreements and applicable standards or regulation, but rather complement it. If there is a different requirement between the applicable laws and regulations, the KEMAS PKG and the Supplier’s Code, policies, and procedures, the strictest provision must be followed.

GENERAL REQUIREMENTS

KEMAS PKG expects all Suppliers to be honest, fair, and trustworthy in conducting their business activities, especially when engaging with us. KEMAS PKG Suppliers are required to:

- Demonstrate commitment to the fulfillment of this Code by adopting this Code or developing their own equivalent to this Code.
- Comply with all applicable laws and regulations, along with standards and requirements governing KEMAS PKG and Suppliers’ business while conducting business, including but not limited to:
 - **Trade Laws:** comply with all applicable trade controls, as well as all applicable export, re-export, and import laws and regulations.
 - **Anti-Monopoly Laws:** conduct business in full compliance with anti-trust and fair competition laws that govern the jurisdictions in which Suppliers conduct their business. Suppliers are prohibited from involving in any engagement through contracts, arrangements, understandings, or concerted practices that have the purpose, effect, or

likely effect of substantially lessening competition in a market in anti-monopoly practices, including an agreement with competitors to fix the price, rig bid, or restrict supplies.

- **Anti-Money Laundering Laws:** comply with the anti-money laundering policies and ensure adequate processes and controls are in place to prevent and detect money laundering attempts in the business.
- **Labour Laws:** comply with the worker protection policies in carrying out their work and provide workers with decent living opportunities without discrimination against race, sex, and gender.
- Conduct their business activities and fulfil all legal and contractual obligations honestly, transparent, and accountable manner.
- Establish an adequate management system to ensure the effectiveness of overall business operation (especially pertaining to the fulfilment of requirements under this Code), considering its business size and associated risks. This includes effective preventive, monitoring, and reporting controls or activities for their business operations.
- Promote the *Speak-Up* culture in their business which encourages employees and stakeholders to raise their concerns.
- Provide an effective and confidential mechanism for employees and stakeholders to raise their concerns related to works, or report violations towards this Code, the KEMAS PKG and Supplier's own policies or procedures, and the applicable laws & regulations. Ensure that the appropriate measures concerning the report are taken in an objective and unbiased manner.
- Promptly inform their KEMAS PKG's representative of any circumstances they faced that might hinder them from fulfilling their obligation concerning this Code.
- Educate and train employees, subcontractors, and others deemed necessary to ensure their understanding and compliance to KEMAS PKG's and Supplier's Code, policies and procedures, and applicable laws and regulations.

Following below are the values that constitute this Code:

1. ENVIRONMENT, HEALTH, & SAFETY

KEMAS PKG Suppliers must integrate sound, secure, health, and safety management practices into all aspects of business. In addition, Suppliers must also respond to challenges posed by climate changes, and work towards protecting the environment.

1.1. Working Environment

KEMAS PKG Suppliers must:

- Provide a secure, safe, and healthy work environment and fully comply with all safety and health laws, regulations, and practices, including those applicable to the areas of occupational safety, natural disaster and emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food and drinking water, and housing. Adequate steps must be taken to prevent and minimize the causes and impacts of hazards inherent in the working environment, including by providing all standard personal protective equipment that is

suited to the type of work being carried out, as well as meeting the requirements of the Contractor Safety Management System (CSMS) guidelines applicable in KEMAS PKG.

- Prohibit the use, possession, distribution, or sale of illegal drugs, especially in KEMAS PKG's premises or anywhere when conducting business activities for the purpose of fulfilling contractual obligation with KEMAS PKG, including in the Supplier own premises and public area. Possession or use of weapons while on company premises or undertaking company business is strictly prohibited unless specifically required and regulated by local laws.

1.2. Products & Services Safety and Quality

KEMAS PKG Supplier must adhere to all applicable laws, regulations, and customer requirements regarding quality, health, and safety standards for the products and/or services provided, including the prohibition or restriction of specific substances and labelling for recycling and disposal.

1.3. Environmental Protection

KEMAS PKG is committed to being actively involved in the global effort of reducing emissions to combat climate-changing and protect biodiversity. KEMAS PKG also encourages the same commitment from KEMAS PKG Suppliers. At the minimum, KEMAS PKG Suppliers must comply with the below requirements:

- Obtain, maintain, and keep current all required environmental permits and registrations, and follow such permits' operational and reporting requirements.
- Endeavor to use resources efficiently and reduce or eliminate waste of all types, including water and energy, by implementing appropriate conservation measures in their facilities, through their maintenance and production processes, and by recycling, reusing, or substituting materials.
- Comply with all applicable environmental laws and regulations regarding hazardous materials, air emissions, waste, and wastewater discharges, including the manufacture, transportation, storage, disposal, and release to the environment of such materials.
- If applicable, identify the chemicals or other materials being produced and/or released that pose a threat to the environment and manage them appropriately to ensure their safe handling, movement, storage, use, recycling, or reuse and disposal.

2. FAIR EMPLOYMENT PRACTICES

KEMAS PKG expects its Suppliers to share its commitment to human rights and equal opportunity in the workplace. All KEMAS PKG Suppliers must conduct their employment practices in full compliance with all applicable laws and regulations and must, without limitation, adhere to the below provisions.

2.1. Diversity & Inclusion

While respecting cultural differences, KEMAS PKG requires Suppliers to avoid discrimination in hiring, compensation, access to training, promotion, termination, and retirement based on race, color, gender, national origin, religion, age, disability, gender identity or expression, marital status, pregnancy, sexual orientation, political affiliation, union membership, or other protected characteristics.

Suppliers are encouraged to foster an inclusive workplace where all employees feel respected, valued, and included. Inclusion goes beyond diversity; it ensures that individuals feel safe, appreciated, and respected in the workplace. A diverse workforce without inclusion can hinder a company's ability to perform at its best.

2.2. Safe Working Environment

KEMAS PKG is committed to maintaining a workplace free from harassment, abuse, and unlawful discrimination. Suppliers must align with this commitment by prohibiting physical disciplinary actions, sexual or verbal abuse, harassment, and intimidation in any form. Suppliers must also ensure that no employee faces retaliation for raising concerns or reporting violations of company policies or laws.

2.3. Use of Voluntary Labor Only

Suppliers are strictly prohibited from employing forced labor, including indentured labor, bonded labor, or prison labor. Any involvement in or support for human trafficking or the use of involuntary labor through threats, force, deception, or coercion is also strictly forbidden.

2.4. Prohibition of Child Labor

Suppliers must comply with all applicable minimum working age laws and regulations and must not employ child labor in any form. Suppliers are prohibited from hiring individuals who are under the age required to complete compulsory education or below the legal minimum working age—whichever is higher. KEMAS PKG supports legitimate workplace apprenticeship programs designed for the educational benefit of young people and will not work with Suppliers who exploit such systems.

2.5. Working Hours and Compensation

Suppliers must adhere to all applicable laws and regulations regarding working hours, overtime, and compensation. All disciplinary actions must be documented. Wages, benefits, and overtime pay must comply with applicable laws, and any terms agreed upon under a legal collective bargaining agreement must be appropriately fulfilled.

2.6. Freedom of Association and Collective Bargaining

Suppliers must respect employees' rights to freedom of association and their ability to form, organize, and join unions or other associations, as well as engage in collective bargaining, in accordance with applicable laws and regulations.

3. BUSINESS ETHICS AND INTEGRITY CONDUCT

3.1. Conflicts of Interest

Suppliers must avoid actual conflicts of interest or the appearance of impropriety when conducting business with KEMAS PKG. Any potential conflict of interest must be disclosed in writing before engaging in business with KEMAS PKG. This includes, but is not limited to:

- Ownership or beneficial interest in the Supplier's business by public officials, government representatives, political party representatives, or employees of KEMAS PKG.

While a conflict of interest is not necessarily a violation of KEMAS PKG policy, failing to disclose it promptly is always a violation. Disclosure is mandatory to allow management to identify and mitigate risks that may influence business decisions.

3.2. Anti-Bribery and Corruption

KEMAS PKG has zero tolerance for bribery and corruption and is committed to complying with all applicable anti-bribery and corruption laws. Suppliers must not engage in bribery, kickbacks, facilitating payments, or any corrupt practices, whether in dealings with public officials or private individuals.

Suppliers must comply with all applicable laws governing lobbying, gifts, payments to public officials, political campaign contributions, and related regulations. Suppliers are strictly prohibited from:

- Offering, promising, giving, or receiving anything of value (e.g., travel, gifts, hospitality, charitable donations) to:
 - Unlawfully obtain proprietary, private, or confidential information.
 - Improperly influence any act or decision for the benefit of the Supplier or KEMAS PKG.
 - Otherwise promote improper business interests.

Definition of Bribery:

Bribery includes offering, giving, receiving, or soliciting anything of value to influence an action or decision or gain an improper business advantage.

Definition of "Anything of Value":

This includes, but is not limited to:

- Cash or cash equivalents (e.g., vouchers, e-cash, checks).
 - Gifts to family members.
 - Loans, debt write-offs, or personal favors.
 - Rebates, kickbacks, or insider information.
 - Entertainment, meals, travel, or charitable contributions.
 - Business or employment opportunities.
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3.3. Gifts and Entertainment

Exchanging anything of value may improperly influence business decisions and could constitute bribery or create a conflict of interest. For this reason, KEMAS PKG enforces a **NO GIFTS** policy with its Suppliers and business partners.

- **Prohibited Actions:**
 - Offering anything of value to obtain or retain a benefit or advantage for the giver.
 - Offering anything that might appear to influence, compromise judgment, or obligate a KEMAS PKG employee.
- **Business Meals:**
 - Business meals are allowed only if the purpose is to discuss business and the meal is shared together.
 - Suppliers must exercise good judgment, discretion, and moderation when offering meals and ensure compliance with all policies, regulations, and local customs.

KEMAS PKG values proper business relationships and respects all business partners. Refusing well-intended gifts is not intended to be discourteous but is necessary to avoid any inappropriate influence on business decisions. Suppliers are expected to maintain a similar gifts and entertainment policy.

3.4. Business Records

Suppliers must honestly and accurately record and report all business information and transactions, including dealings with KEMAS PKG. The creation, retention, and disposal of business records must comply with all applicable standards, legal, and regulatory requirements.

Suppliers must be truthful and transparent when disclosing information to stakeholders, including regulatory agencies and government officials.

3.5. Protection of Intellectual Property, Information, and Assets

Protecting intellectual property, information, and assets is critical to KEMAS PKG. Suppliers must:

- Respect and protect the intellectual property rights of all parties by using only legitimately acquired and licensed software, hardware, and content.
- Protect and responsibly use KEMAS PKG's physical and intellectual assets, including confidential and proprietary information, tangible property, supplies, and equipment.
- Respect the privacy and personal information of KEMAS PKG employees and business partners, ensuring access is limited to legitimate business purposes or legal requirements.
- Comply with all KEMAS PKG requirements for maintaining confidentiality, security, and privacy, including proper use of passwords and access to corporate systems.

Suppliers are prohibited from using KEMAS PKG-provided technology or systems to:

- Create, access, or send inappropriate, offensive, or harassing material.
- Send false, derogatory, or malicious information.
- Benefit personal needs or advantages.

3.6. Insider Dealing

Suppliers must avoid insider dealing, which is illegal and unethical. Suppliers must not:

- Acquire confidential or non-public information unlawfully.
- Make business decisions or trades based on confidential or non-public information.
- Share confidential or non-public information without prior authorization.

3.7. Engagement with Communities

KEMAS PKG believes in contributing to the prosperity and welfare of its stakeholders and communities. Suppliers are encouraged to:

- Engage with surrounding communities as trusted partners.
 - Promote and empower the social and economic development of communities.
 - Protect cultural heritage and respect property and land rights, including those of indigenous peoples.
 - Ensure all negotiations related to property and land use are transparent, documented, and conducted with prior and voluntary consent.
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3.8. Accountability and reporting

KEMAS PKG requires all Suppliers to comply with this Supplier Code of Conduct. Suppliers must promptly inform their KEMAS PKG contact or a member of KEMAS PKG management if any situation arises that causes the Supplier to operate in violation of this Code.

To ensure understanding, KEMAS PKG may provide training on this Code, which may be mandatory for Suppliers.

While Suppliers are expected to self-monitor and demonstrate compliance, KEMAS PKG reserves the right to:

- Conduct audits or inspections of Suppliers and their facilities to confirm compliance.
- Take corrective measures, including contract termination or removal of Supplier personnel, in cases of non-compliance with this Code or applicable laws and regulations.

Key Question of Integrity

Suppliers must remember that this KEMAS PKG Supplier Code of Conduct is not a substitute for their good judgment. This Code is not meant and cannot cover every conceivable situation. For this reason, Suppliers should be alert to signs that they might be in an integrity grey area and ask themselves three simple questions if there are doubts about what they should do.

1. How would this decision look to KEMAS PKG, your own company, and other parties?
2. Is your action compliant with laws, your own company's policies, and this Supplier Code of Conduct?
3. Would your action damage KEMAS PKG's and/or your own company's reputation

¹ Intellectual property is among KEMAS PKG's most valuable assets. Intellectual property includes patents, trade secrets, trademarks, copyrights, and designs, and helps protect KEMAS PKG's inventions, manufacturing processes, brands, business plans, marketing documents and graphics, software, product shapes, proprietary information, and many other things.

Proprietary information is information that is undisclosed, for example, not publicly known or generally available, and that is held in confidence.

Personal information is any information that could be used to identify someone, either directly or indirectly, for example, name, employee and personal ID, address, phone number, biometric and genetic data, and other sensitive data or information.