

BUSINESS CODE OF CONDUCT

What is the BCOC and Why Do We Have It?

At PT. Indah Kiat Pulp & Paper Tbk (hereinafter referred as the “Company”), we believe that maintaining the highest ethical standards is vital to our business’s long-term sustainability and growth.

Our daily conduct is the key to upholding the Company’s reputation among employees, suppliers, customers, competitors, communities, and other stakeholders. We all have to respect the law, act with integrity and honesty in all matters. We must be accountable for our actions.

Our Business Code of Conduct (BCOC) acts as a set of guiding principles to help you as our employee and others make informed and ethical decisions at work and ensure we all act consistently with the Company’s values. It is also the foundation of the Company’ Culture, which is based on honesty and integrity.

Waivers and Modifications of Rules:

The Company operates globally, and as a result, there may be times when local laws and regulations conflict with the BCOC. Whenever there is a difference or conflict between local legal requirements and the BCOC, we shall apply the strictest requirement.

Who must follow the BCOC?

This BCOC applies to all the Company’s employees worldwide. It applies to you, whether you are a full-time/permanent, temporary/ contract, or intern employee, and anyone who works on our behalf.

We also expect our joint ventures and business partners, including suppliers, vendors, third parties, and their employees, to act in a way consistent with our BCOC.

What is Our Responsibility for the BCOC?

As the Company’s employees, each one of us has the responsibility to:

- Read, understand, and be familiar with the requirements in the BCOC, along with any policies applicable.

- Complete the BCOC training on an annual basis.
- Consistently act and behave in accordance with the Company's values and BCOC.
- Ensure our suppliers, contractors, and business partners act consistently with the provision in our BCOC.
- Speak Up. Raise questions or concerns when in doubt or when you are aware of any possible violations of our BCOC.
- Cooperate fully with an audit or investigation.

As a supervisor, line manager, head, or leader, you have additional responsibilities to:

- Ensure all your team members read, understand, and be familiar with our BCOC. You are responsible for helping your team members understand our BCOC.
- Ensure all your team members complete the BCOC training on an annual basis.
- Be a role model by consistently acting and behaving in accordance with our BCOC.
- Encourage your team members and other parties to Speak Up.
- Listen and properly respond to questions and concerns raised.

Speak Up – When and How:

When should you Speak Up?

Every one of us has a responsibility to Speak Up, ask questions when in doubt, or raise concerns. As our employee, you are responsible to submit a report when you see any unethical behaviour, unsafe act, and potential violations of our BCOC. You should also ask questions whenever you are in doubt or have an ethical dilemma in making a decision at work.

We also encourage our third parties or stakeholders to Speak Up and raise their concerns related to our Companies.

For you to feel comfortable to Speak Up, we provide an option for everyone to report concerns anonymously.

How can you Speak Up?

There are several options for you to Speak Up, as follows:



We understand it is not always easy to raise concerns but we do **encourage you to come forward** with any concerns and Speak Up!

Any concern will be dealt **appropriately** and **confidentially**.

Integrated Call Center (ICC)

One of the options for everyone to Speak Up is through the Integrated Call Center (ICC). ICC is a 24/7 Speak Up channel for the Company's internal and external parties to ask questions and raise concerns. You may contact ICC anonymously, and your report will be kept confidential following the applicable policies and regulations.



The banner features a woman in a black blazer on the left. To her right is a red square with the text 'ICC Integrated Call Center'. Further right, it says 'We want everyone to **SPEAK UP!**'. Below this is a red button with 'TOLL FREE | 0800 1 368 368' and 'app_callcenter@app.co.id'. At the bottom, there are nine icons representing different service categories: Emergency, Customer Service, Fraud Report, Work Incident, Customer Complaint, Community Grievance, Supplier Inquiry, Product Inquiry, and Natural Disaster.

Zero Tolerance on Retaliation

Retaliation can be in many forms, e.g., threats, intimidation, exclusion, humiliation, and unfair treatment. The Company does not tolerate any forms of retaliation against anyone who reports any violations in good faith. We consider retaliation as misconduct, which will be subject to an internal investigation.

If you believe that you or someone else is experiencing retaliation, you shall Speak Up.

Learn more: [Whistleblower Program](#)

Section 1 – Our People

Diversity and Inclusion

The Company is committed to a working environment that promotes diversity, inclusion, and equal opportunity. We believe in the importance of a workplace with mutual trust, respect for human rights, and no discrimination. Therefore, we recruit and retain the best talent from around the world and value each individual's unique background and talent.

We believe that diverse backgrounds, experiences, talents, ideas, as well as the ability to work together in an inclusive environment will lead the Company in a better direction to achieve common goals.

What you shall do:

- Be aware and respectful of cultural differences.
- Treat everyone with respect.
- Recognize each other's diverse backgrounds and abilities.
- Value input and ideas of others.
- Encourage and listen to those who Speak Up.

Equal Opportunity

We are committed to providing equal employment opportunities and to treat everyone with respect, fairness, and dignity. Decisions regarding our employees and applicants must always be based on merit, qualifications, and job-related performance.

What you shall not do:

- Base the employment decisions (e.g., hiring, training, promoting, and compensation) on non-job-related characteristics such as race, ethnicity, national origin, gender, age, religion, disability, and others legally protected status.
- Inappropriate behavior, including making offensive comments and inappropriate jokes of a violent or sexual nature.

Safe Working Environment

At the Company, we are committed to prevent workplace violence and maintain a safe working environment. We support your physical and mental wellbeing as an employee and ensure safe working conditions. The Company is committed to not use any form of forced, trafficked, or child labor. We respect the dignity of the individual, also your right to freedom of association and collective bargaining.

We do not tolerate acts of verbal or physical abuse, behavior that make another individual feel threatened or unsafe, and any form of sexual harassment. All employees, customers, vendors, and business partners should be treated with courtesy and respect at all times. We are all responsible for maintaining the workplace that is free from harassment and violence.

What you shall do:

- Help to create and maintain a workplace environment that is free from harassment and violence.
- Do not threaten, intimidate, or coerce another employee, customer, vendor, or business partner.
- Do not make any inappropriate or offensive comments to another employee, customer, vendor, or business partner.
- Do not make any inappropriate comments of a sexual nature or engage in any sexual offensive behavior against other employees, customers, vendors, or business partners.
- It is prohibited to possess or use weapons while on company premises or while undertaking company business unless you have received specific authorization from the Company to do so and the possession or use of weapons is applicable under the local laws and be willing to comply with the Company's established rules.
- Do not use Company resources (tools, materials, spare parts, and others) to threaten, stalk, or harass anyone at or outside the workplace.
- As soon as possible, report any direct or indirect harassment, threats of violence, incidents of actual violence, and suspicious individuals or activities noticed.

Protecting to Personal Information

We respect your privacy as an employee, including your personal information. We only use employees' personal information for legitimate business reasons and when needed to comply with the laws and regulations.

What you shall do:

- Protect personal information with appropriate care to prevent misuse and loss. You are strongly advised to label the personal information as "confidential" to alert the confidentiality.
- Obtain approval from authorized personnel before sharing personal information with anyone. Only those with a need to know may use confidential information.
- Consult with HR when in doubt.

Conflict of Interest

Conflict of interest means any activities and situation that would constitute an actual or perceived conflict between personal interests and our Company's interests. Conflicts of interest may arise where an employee places his or her personal interests before the interests of the Company, where such personal interests unduly influence that employee's business judgments, decisions, or actions.

We prohibit any conflict of interest that might hinder you from making business decisions in our Company's best interest.

What you shall do:

- Read, understand, and comply with our Company's policy of Conflict of Interest (E-Kinship).
- Make business decisions in the best interest of our Company at all times.
- Avoid, eliminate, resolve, and appropriately disclose any situation that creates, or appears to create, a conflict of interest between personal and the Company's interests.
- Disclose any situation that creates or appears to create a conflict of interest in the E-Kinship system, which must be updated every year, so that we could review the situation and determine steps that should be taken to manage the potential conflict.

Learn more: [Conflict of Interest \(E-Kinship\) Policy](#)

Section 2 – Duty of Care

Workplace Health, Safety, and Security

the Company is committed to the highest standard of health, safety, and security. All of us share the responsibility to maintain health, safety, and security at our workplace to protect our people and the Company's ongoing business.

Everyone must strive to maintain a safe and healthy working environment. The Company's facilities must operate in compliance with the applicable health and safety regulations and the Company's standards, which may be more stringent.

What you shall do:

- Understand and get involved with the workplace health, safety, and security systems.
- Keep the workplace tidy, clean and safe to minimize potential risk of workplace accidents.
- Adhere to safe working procedures and use the equipment correctly.
- Wear protective clothing and equipment that has been adapted to the risks of the work area, whenever required.
- Help new employees, partner and visitors to understand the proper workplace health, safety, and security procedures, and why they should play an active role.
- Tell your supervisor or manager of any health, safety, and security concerns as soon as they arise.
- Promptly report any pain, discomfort, accidents, or anything else that might present a risk to the health and safety of any person.
- Report minor work-related injuries, minor accidents, and "near-misses." This is essential to help us identify hazards and take corrective action before serious injuries occur.
- Encourage our vendors, suppliers, contractors, and others to comply with health, safety, and security regulations.

Drugs and Alcohol Use

Drug and alcohol use at work poses a threat to our people's health and safety, and the Company's security. Everyone is prohibited from being under the influence of alcohol or drugs (both legal and illegal drugs) when at work on company premises or engaged in company business.

Unauthorized buying, selling, manufacturing, or dispensing alcohol or drugs is strictly prohibited within our company premises. Moderate consumption of alcohol as a part of work-related external relations activities is acceptable where reasonable and aligned with the applicable provision and laws.

Section 3 – Business Partners

Maintaining Long-Term and Sustainable Relationship

Our business partners are essential to our business, including our customers, suppliers, vendors, contractors, and third parties. the Company is committed to acting fairly in selecting our suppliers and customers. the Company also seeks to work with business partners who share the same commitments with our ethics and compliance.

What you shall do:

- Clearly communicate our expectations to suppliers, customers, and other business partners; and agree on the applicable contractual obligations.
- Take the appropriate measure in a situation where our business partners do not meet the expectations and obligations.
- Treat our business partners fairly and honestly.
- Protect business partners' confidential information, e.g., pricing, technology, data, and others.
- Report any indications that our business partners are not complying with the applicable laws or the contractual agreement.

Gift and Entertainment

Receiving and providing gifts and entertainment from and to our business partners can become risky. Exchanging gifts and entertainment in return for any business, services, or confidential information is strictly prohibited.

What you shall do:

- Read, understand, and comply with the Company's applicable policy of Gift and Entertainment.

Learn more: [Gift and Entertainment Policy](#)

Prevention of Money Laundering

Money laundering is the process of concealing illegal sources of funds and makes it look legitimate through different stages, placement, layering, and integration. We strictly prohibit this practice in the Company.

What you shall do:

- Build your awareness of the money laundering process.
- Follow the counterparty due diligence process before engaging with business partners.
- Never get involved in money laundering activities.
- Raise concerns when you see any indications of money laundering.

Avoidance of Anti-Competitive Conduct

Anti-competitive conduct is a business practice that limits or prevents competition. Anti-competitive conduct is against the law. We prohibit any engagement in anti-competitive practices, including an agreement with competitors to fix the price, rig bid, or restrict supplies.

What you shall do:

- Know your counterparty before making any business deal by following and performing due diligence.
- Do not solicit or accept bribes or kickbacks from anyone who is seeking to do business with the Company.
- Do not offer, give, or receive any bribes, kickbacks, facilitation payments, or other forms of illegitimate payments.
- Keep accurate records with its supporting documents and ensure all payments are legitimate and not used for any unlawful purpose.
- Raise concerns if you see any indication of anti-competitive conduct.

Section 4 – Environment, Community, and Government

Environmental Protection

Environment protection is one of the targets to be achieved from the three sustainability pillars that form the basis of our sustainability initiatives. The Company fully supports the nation's commitment to protecting the environment. The Company is also committed to carefully and responsibly manage these resources.

What you shall do:

- Understand and comply with health, safety, environmental management and protection regulations in your daily activities.
- Ensure that the Company's facilities meet and exceed the relevant regional, national, and international standards wherever we operate.

- Demonstrate awareness of and commitment to the Company's environmental policies.
- Promptly report any environmental risks, hazards, or any potential violation of our environmental protection policies.
- Encourage our suppliers, contractors, customers, and other business partners to engage in responsible stewardship practices towards environmental protection.
- Contact the Sustainability function or your local Health, Safety and Environment (HSE) function for further information and if you are in doubt.

Engagement with Communities

We are committed to being a trusted partner to the communities where we operate and contribute to those communities' development through our various investment programs.

What you shall do:

- Maintain a sustainable relationship with the surrounding community.
- Contact Corporate Social Responsibility (CSR) function or Health, Safety and Environment (HSE) function for any information and questions related to surrounding communities.

Managing Public Communication

The public communications must be clear, accurate, consistent, and responsible. Only a person appointed or authorized by the Company can talk to the public and media. We prohibit the disclosure of any confidential and proprietary information to anyone without prior approval.

What you shall do:

- Always be careful when posting anything on social media. Do not expect privacy if you participate in social media.
- Always consult with Communication function before making a post related to the Company on social media.
- Many of you are a subject matter expert in your area and are invited to share your expertise through presentations. Make sure you consult with Communication function or Legal function before presenting any company related materials to the public.
- When in doubt, please contact Communication function or Legal function.

Learn more: [Social Media Policy & Guideline](#)

Anti-Bribery and Corruption

We do not tolerate any forms of bribery and corruption in conducting our business. We are committed to complying with the applicable anti-bribery and corruption laws and regulations wherever the Company operates.

What you shall do:

- Understand and comply with the Company's applicable Anti-Bribery & Corruption Policy and the local laws and regulations.
- Know your counterparty before making any business deal by following and performing due diligence.
- Do not offer, give, or receive any bribes, kickbacks, facilitation payments, or other forms of illegitimate payments or allow others to do so on the Company's behalf.
- Do not solicit or accept bribes or kickbacks from anyone.
- Keep accurate records with supporting documents and ensure all payments are legitimate and not used for any unlawful purpose
- If you are dealing with government officials, you must know and follow the particular rules related to this situation. If you are in doubt, please consult with Ethics and Compliance function.

Learn more: Anti-Bribery and Corruption Policy.

Stance on Political Contributions and Activities

We do not prohibit our employees from participating in the political and governmental process or communicating personal views to appointed and elected officials. However, you cannot identify yourselves as representative of the Company or any of its affiliates, contractors, and suppliers when communicating personal views. The Company name shall not be used in political campaigns or to promote the interests of political parties or candidates.

What you shall do:

- You should not engage in personal political activities during paid working hours or using our Company resources (such as funds, e-mail, phones, and meeting rooms) since such actions can be considered as political contributions by the Company.
- You need to obtain approval from your manager before engaging in any political activities.
- Personal political activities can sometimes create a conflict of interest. Talk to your manager or the Ethics and Compliance function if it occurs.

Section 5 – Asset Protections, Records, and Financial Integrity

Protection to the Company's Assets

We are all responsible for protecting our Company's assets, including funds, facilities, property, machines, spare parts, computers, IT systems, information, intellectual property, scrap, energy, electricity, and others. We are also responsible for safeguarding our Company's intellectual property and for respecting the intellectual property of others.

You should only use the Company's assets for business purposes and to properly manage company assets to ensure that they are not damaged, misused, lost, stolen, or wasted. All of us also need to manage budgets, expenses, and other funds properly and accurately.

What you shall do:

- Ensure efficient daily use of our Company resources.
- Follow the Company's travel rules and policies.
- Any company's information/data can be deemed confidential. Do not share the Company's information/data without prior approval from an authorized person.
- Do not share your user ID and password associated with Company access to others.
- Be vigilant against cyber-attacks such as phishing and spam. Report any incidents of cyber-attack that you are aware of to the Information Technology (IT) Department or contact ICC if you are in doubt.

Maintaining Accurate and Complete Record

The Company's books and records must be prepared accurately and truthfully. Books and records can include expenditure reports, job logs, sales reports, materials and stock reports, finished goods and production reports, waste reports, measurements, and others.

The Company is committed to ensuring all financial statements, regulatory reports, and publicly filed documents comply with all applicable requirements. We all responsible for ensuring that all transactions are appropriately recorded, authorized, and reported as required.

What you shall do:

- Ensure that all transactions are properly recorded, authorized, and reported as required.
- Ensure all financial statements, regulatory reports, and publicly filed documents comply with all applicable requirements.
- Follow the applicable procedure (requirement) related to retaining, maintaining, and destroying data and documents.
- Always provide clear and truthful information and cooperate fully during audit programs and the investigation process.

Avoidance of Insider Dealing

In our work, we may become aware of information about the Company that is not publicly available. However, the information may be relevant to investors in making a decision whether to invest in the Company shares or not. Insider dealing is strictly prohibited in the Company. Sharing this "inside information" for a trading purpose is considered illegal based on law and regulation and can result in penalties.

What you shall do:

- Do not share inside information with anyone as a tip to buy or sell the Company shares.
- Do not share any non-public information without prior approval and consultation with the Legal function.
- Never buy or sell the Company shares based on inside information that is not publicly available.
- Consult with the Legal function for further details related to insider dealing.

Jakarta, 31 May 2023

Glossary

- Retaliation: Any detrimental treatment, such as dismissal, disciplinary action, discrimination, threats, intimidation, exclusion, humiliation, and unfair or unfavorable treatment resulting from a concern raised in good faith.
- Gift & Entertainment: Any form of a gift, entertainment, hospitality, reward, benefit, or other incentives that are received or offered.
- Anything of Value: Refers to cash or cash equivalent (voucher, e-cash, cheque, deposit, others); gifts to family members; debt write-off; loans; personal favors; sexual favors; rebates; kickbacks; insider information; entertainment; meals and travel; political, social and charitable contributions; business or employment opportunities; medical care; and others. Items of value that are given in compliance with the requirements of this policy and the applicable Anti-Corruption Laws; and which are not given with the intent to secure an undue or improper advantage will not be considered as bribes.
- Bribe: The act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting anything of value, whether directly or indirectly, to induce or influence an action or decision, which interferes with the Company's value, policies, and procedure, and/ or the applicable laws, rules, or regulation.
- Facilitating Payment: Bribes or unofficial payments given to or by the Company employee intended to speed up routine transactions to which the payer is already entitled, such as to speed up licensing or invoicing process.
- Phishing: Fraudulent attempts through electronic communication, mostly e-mail, to obtain sensitive personal information, such as username and password, PIN, Credit Card.
- Spam: Refers to the e-mail sent without request, which mainly contains advertisement content.

REFERENCE

REGULATION (LAW)

Law of the Republic of Indonesia Number 5 of 1999 concerning Prohibition of Monopolistic Practices and Unfair Business Competition

Law of the Republic of Indonesia Number 20 of 2001 concerning Eradication of Corruption Crimes

Law of the Republic of Indonesia Number 15 of 2002 concerning the Crime of Money Laundering

Law of the Republic of Indonesia Number 13 of 2003 concerning Indonesian Manpower

Law of the Republic of Indonesia Number 32 of 2009 concerning Environmental Protection and Management

Law of the Republic of Indonesia Number 7 of 2014 concerning Trade

STANDARD

International Labour Organization (ILO) Core Convention

United Nations Guiding Principles on Business and Human Rights (UNGPs on BHR)

United Nations Global Compact (UNGC)'s 10 Principles