

ANTI-FRAUD AND ANTI-CORRUPTION POLICY

Legal Basis

1. Law Number 8 of 1995 concerning the Capital Market;
2. Guidelines for the Implementation of Good Corporate Governance;
3. Company Code of Ethics.

As a commitment to improve anti-fraud and anti-corruption practices and culture in the environment, the Company has established several policies related to corruption prevention, among others.

1. Company Code of Ethics related to Anti-Fraud and Anti-Corruption.
2. Conflict of Interest Policy

These policies aim to provide guidelines, including those related to preventing corruption within the Impack environment.

Policy

The Company expects the highest standards of integrity from all employees, particularly in terms of employee liability for Company assets, including money and confidential information entrusted to them or received by them in the course of carrying out their work in the Company.

The Company takes a serious view of any deviation from any of its employees. Disciplinary action must be taken against any employees who are found to have violated their fiduciary or legal obligations to the Company with respect to assets entrusted to them or received by them. Such breaches include without limitation such fraudulent misappropriation of assets or criminal breach of trust.

Management Responsibilities

Each Business Unit is responsible for being aware of the areas of exposure and risk associated with the handling of money, assets and company information. Management should establish and review internal controls and procedures that should be designed to prevent and detect irregularities. Without exception, any irregularities must be reported to the Divisional Director and the internal audit manager for their actions.

It is the responsibility of the internal audit manager to conduct a review of control systems and procedures to cover areas of higher exposure and risk so as to provide reasonable assurance to Management regarding appropriate behavior and compliance with the controls and procedures implemented by Management. The internal audit manager is also responsible for conducting investigations into violations committed by employees as required by Management.

Investigation Procedures and Guidelines

To ensure that all investigations and disciplinary action with respect to violations are conducted in a fair and consistent manner, the following procedures and guidelines must be adhered to:

- a. It is every employee's responsibility to promptly notify his or her supervisor or the head of the operating unit if he or she has reasonable grounds to believe there has been a deviation from another employee.
- b. Upon receipt of the notification, the head of the operations unit must carry out a preliminary investigation to determine whether there is a prima facie case. If a prima facie case is found, the head of the operations unit must immediately notify the Head of Division, head of finance, internal audit manager.
- c. The Head of Division or in the absence of the chief financial officer of the Division, not later than seven (7) days from notification, appoints an Investigation Panel to investigate to establish and verify the relevant facts. The composition of the Panel must be approved by the Head of Division.

The Investigative Panel consists of three (3) representatives, each from:

- i. Human Resources Department Division or Group
- ii. Department of Finance Division
- iii. Operational units that are not the direct supervisor or subordinate of the employee being examined.

The Panel may seek the assistance of the internal audit manager in conducting the investigation.

- a. In investigating, proper investigative procedures must be followed.
- b. All Panel processes and actions must be documented and/or minuted. The Panel shall prepare its report as soon as practicable but no later than seven (7) days from the date of its last hearing to conclude its findings. The Panel, in conducting any investigation, shall consider the need for prudent action to allow further action including reporting to the relevant law enforcement authorities to be taken as soon as practicable.
- c. All fraudulent acts committed by employees which are criminal acts according to the laws of the country where the Company/Unit operates, must be reported in writing to the authorized law enforcement officers, without any exceptions. All such written reports must obtain prior permission from the GFH or Group legal department or legal counsel.
- d. All proven cases of misconduct by employees must be reported to Group Headquarters as soon as the case is proven in the opinion of the Investigative Panel

To support the Anti-Fraud and Anti-Corruption Policy, the Company also provides a whistleblowing system as a means of reporting for internal Impack and external parties.