

WHISTLEBLOWING SYSTEM AND GRIEVANCE

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.

Whistleblowing System

In order to support the implementation of Good Corporate Governance (GCG) within the Company, a good and efficient supervisory system is needed, including the stakeholders. The Company has a reporting system that can be monitored directly by the President Director for all types of violations, including:

1. Frauds (fraud);
2. Manipulation of data and reports;
3. There is a conflict of interest (conflict of interest);
4. Misuse of the Company's business data;
5. Other GCG violations.
6. Submission of other grievance.

Impack has a formal reporting system or Whistleblowing System (WBS) which has been implemented in every aspect of the company's business activity. Reporting violations and submitting grievance can be done by internal parties and from outside the company via WBS.

Apart from using the WBS mechanism, internal and external parties can also submit grievance directly. For internal company matters, employees can directly convey this to the Unit Head, their superiors and/or HR in the unit at work. Meanwhile, external parties to the company can submit grievance through the HR Unit or other company contact persons.

Protection for Whistleblowers

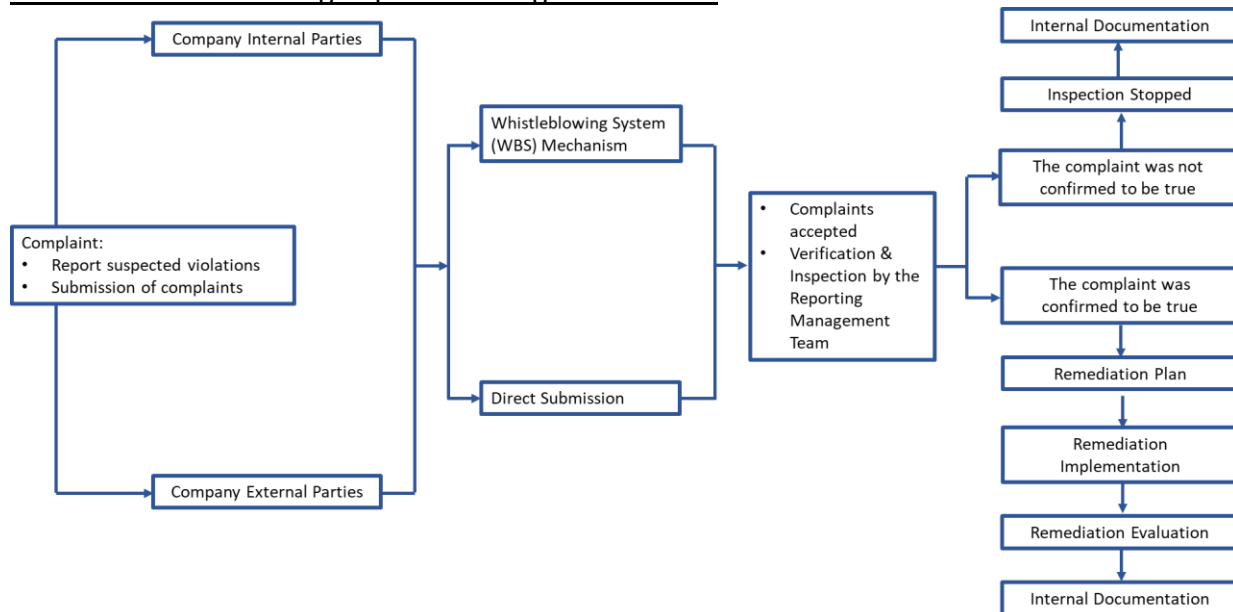
The protection provided by the Company to the whistleblower is:

1. The protection of the identity of the reporter and the contents of the submitted report are guaranteed to be confidential by the Company.
2. The Company guarantees the protection of the whistleblower from all forms of threats, intimidation, or unpleasant actions from any party as long as the reporter maintains the confidentiality of the violation submitted to any party.
3. The protection of whistleblowers also applies to parties conducting investigations as well as parties providing information related to grievance/disclosures.
4. In carrying out the follow-up process on each grievance/disclosure, it is obligatory to prioritize confidentiality, the principle of presumption of innocence and professionalism.
5. Employees who violate the principle of confidentiality will be given sanctions in accordance with the applicable provisions in the Company.

Report Handling Mechanism

All reported violations and grievance that meet the verification criteria will be followed up and handled in accordance with applicable company provisions and policies. The following is a flow chart for reporting suspected violations and submitting grievance:

Flowchart for Submitting Reports of Alleged Violations



Any indication of violation can be reported to:

Reporting Management Team of PT Impack Pratama Industri Tbk

Email: whistleblower@impack-pratama.com

Every report received will be verified and followed up in accordance with the reporting handling mechanism.

The Handling of Grievance

1. Every employee within the Company and its subsidiaries has the same rights in submitting grievance.
2. The contents of the grievance must be constructive and improve the company's performance within the Company and its subsidiaries.
3. Every incoming grievance will only be read by the Company's Reporting Management Team and will be kept confidential.
4. Each grievance must be accompanied by the correct identity of the sender, this is a condition for following up on the grievance. If it is not equipped with the identity of the sender, the grievance will not be followed up.
5. The contents of the grievance submitted must pay attention to high ethics and morals, do not use words/sentences containing SARA, insults, pornography, inappropriate sentences in the contents of the grievance, also not slanderous and the sender must be able to show evidence when requested.
6. The Reporting Management Team will select every grievance received and will follow up on the grievance based on a priority scale.

Sanctions for Violations

Every employee of the Company who is proven to have violated this GCG Guidelines will be given a sanction in accordance with the applicable policies and laws and regulations, namely:

- a. Sanctions for employees who commit violations are decided by their direct supervisor or the Board of Directors according to the level of the violation after receiving a report on the violation committed by the employee concerned.
- b. The Board of Directors provides direction on coaching actions, disciplinary sanctions and/or other actions as well as prevention that must be carried out by direct superiors in their respective environments.
 - a. Sanctions for the Board of Directors who commit violations are decided by the Board of Commissioners.
 - b. Sanctions for the Board of Commissioners who commit violations are decided by the Shareholders.
- c. If the Work Partners or Stakeholders commit a violation, they will be subject to the provisions as stated in the contract. If it is related to a criminal act, it can be forwarded to the authorities.

Implementation and Violation of GCG Guidelines

1. The company must actively disclose the extent of the implementation of GCG principles and the problems encountered.
2. One of the Directors or appointed officials is obliged to monitor and maintain the implementation of GCG as well as possible.
3. The things that are assessed are, among others: the Company's compliance with the Corporate Governance Guidelines, the practices carried out, the conditions that cannot be met in the implementation of GCG, and the formulation of the necessary corrective measures.
4. The Board of Directors and the Board of Commissioners in carrying out their duties must apply the principles of professionalism, efficiency, and GCG principles, namely transparency, accountability, responsibility, independence, and fairness.
5. Every employee is required to report suspected violations of GCG principles.
6. The identity of the reporting employee must be maintained unless required to follow up the report.
7. There is no sanction/punishment imposed on the reporter unless it is later stated that the person concerned is involved and the report is declared to be incorrect.