BUSINESS
CODE OF CONDUCT



PAKERIN
PULP, PAPER, PAPER PRODUCTS, & CHEMICAL MANUFACTURER

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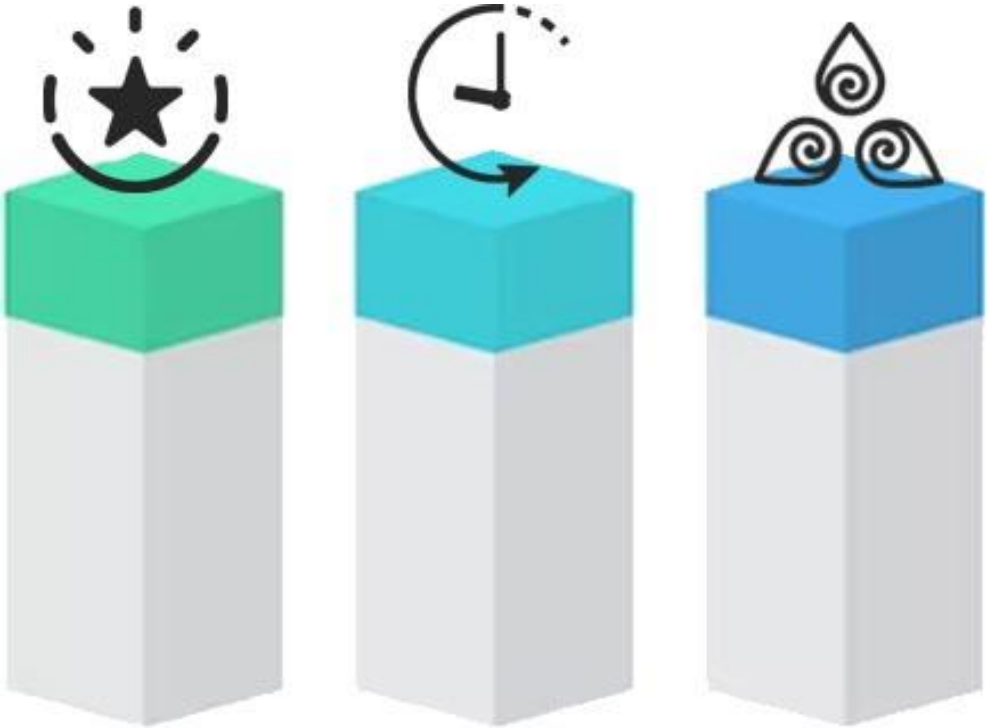


Vision

To be the leading company with the best competitiveness, endurance, and harmony in all aspects

Mission

- Widen the market trust by professionally gaining competitiveness in product quality, service, and efficiency
- Incorporate endurance in all circumstances to thrive and achieve continuous growth
- Nourish sustainable harmony with nature



COMPETITIVENESS

To be competitive, we have to understand the needs of the customers.

We have to work with the Company's perspective in mind and work hand-in-hand to achieve the Company's Objectives.

ENDURANCE

To achieve sustained and continuous growth, we have to keep the confidential information and trade secret secure as part of our competitive advantage.

As the foundation of Company's endurance against external threats and challenges, we have to support the Company's well being through environment sustainability, personal health and safety.

HARMONY

Harmony with our vendors, our people, our customers, and all stakeholders of PT. PAKERIN.

Harmony demands mutual respects, integrity, and team development.

OUR RESPONSIBILITIES

Individual Responsibilities

Our professionalism starts with the implementation of our responsibility and commitment. We are responsible for becoming familiar with and following the policies that apply to our job and level of responsibility. We also are responsible for seeking advice when needed, raising concerns, and reporting to management potential violations of our Code of Conduct.

We deliver our professionalism through:

- OWNERSHIP – we take ownership of all responsibilities given by the Company to us and internalized Code of Conduct as part of our work culture.
- LEAD BY EXAMPLE – be the example for other people by communicating and acting in the manner consistent with our core values.
- STAND FIRM – never compromise our value no matter how strong the internal and external pressure maybe.
- CONSULT WITH OTHERS – we are not responsible to know all the answers but we have the responsibility to consult with others when help required.

Management Responsibilities

Management responsibilities should help ensure that our people understand that ethics and integrity is the cornerstone of our business conduct by:

- BEING A POSITIVE ROLE MODEL – make the Code of Conduct as the standard of our business conduct by showing what it means to act with integrity and Company's point of view.
- ENHANCING UNDERSTANDING – help those we lead or supervise to seek and obtain the knowledge and resources they need.
- BEING A COACH – respond appropriately to anyone who asks a question or identifies a concern, supporting and encouraging those who raise their hands.
- BEING ACCOUNTABLE – take responsibility for our conduct and the conduct of those on our team, and be prepared to be held accountable for that conduct.

Put Ourselves in Our Client Shoes

Our customers / clients are all parties, departments, or persons we provide our product and services to and not limited to the buyers of PT. PAKERIN products.

We recognize that our clients are of paramount importance and the Company will prosper only to the extent that we meet and exceed the needs of our customers.

We deliver professional services to our clients in accordance with Companies policies and relevant technical, professional, and quality standards.

We should start from the client's point of view by asking **what** the clients' needs and wants, **which** of those needs and wants are the most important, **why** the products / services are needed, **where** and **when** should the needs and wants be fulfilled, **who** is the appropriate person to deliver the right products / services to the clients, and **how** the products / services should be delivered. Therefore, we can provide the most appropriate products / services that satisfy the needs of our clients.

We understand that promises are commitments that have to be kept and uphold

We take ownership and accountable for our client's operations and difficulties, and try to solve their problem whichever possible in accordance with our work capacity. It means we have to be there for the clients for assistance, listen to them, maintain long term relationships, and help them to make positive difference.

We promptly respond to all queries from clients.

We handle all customer complaints promptly and fairly.

We endeavor to meet delivery commitments to our clients, uphold their trust, and inform our clients well in advance in the event of inability to meet delivery commitments for unavoidable reasons.



Act with the Company's Perspective in Mind

We uphold the PAKERIN name. We do not misrepresent PAKERIN brand name in professional and other matters.

Employees do not personally comment on any aspect of PT. PAKERIN or its stakeholders to the media. If we receive an inquiry from the media, immediately report it to the person in charge for Public Relations.

We obtain appropriate approvals prior to publishing articles or giving external presentations.

We recognize that our competitive advantage is achieved through the quality of our product delivery, the excellence of our professional service, and the efficiency of our operations.

We continuously strive for the best in achieving the Company's objectives and do not conduct any non-value added or damaging activities during the working hours.

We understand the scope of work assigned as part of the whole company's business practices.

We must ensure that we do not make any business and /or financial dealings that create disadvantages or losses to PT. PAKERIN.

Before we carry out any directions from the managers or supervisors, we should understand the purpose of the directions, the benefits, and the risks of those business practices so that we could perform our works more effectively.

We promote a culture of consultation. When faced with difficult issues or issues that place Company at risk, we consult appropriate person in charge before taking action. We do not hide from or ignore issues.

We recruit, hire and retain the best talent, reflecting the markets and consumers we serve. Developing and retaining a diverse workforce provides us with a sustained competitive advantage.

Protecting the Company's assets is our key responsibility. Care should be taken to ensure that assets are not misused, misappropriated, loaned to others, or sold or donated or mortgaged, without appropriate authorization.

We do not influence or direct other employees to strike, sabotage, conduct illegal activities, and /or other activities that cost the Company.

Keep the Confidential Information Secure

We respect and protect confidential information obtained from, or relating to, our clients or third parties, as well as information about our business processes, technical specifications, and other sensitive information in accordance with our professional standards.

We must exercise caution when interacting with competitors. We must avoid cooperating, or even appearing to cooperate, with competitors.

We obtain, develop and protect intellectual property in an appropriate manner. We respect the restrictions on its use and reproduction.

We may never discuss any of the following information with competitors without Legal's consent:

- Proprietary or confidential information
- Pricing or pricing policy, costs, marketing or strategic plans
- Marketing / promotions we will conduct with customers
- Technological improvements
- Division of customers, markets, territories or countries
- Boycotts of certain customers, suppliers or competitors



We take proactive measures to safeguard our documents, computers and other data devices that contain personal or confidential information.

- We should follow the specific security measures and internal controls in place for the document, computer systems, and data devices to which we have access.
- We have a responsibility to use electronic resources in a safe, ethical, lawful and efficient manner. This means that we should not use Company technologies or systems (including computers and other electronic devices that have access to the Internet, such as Smartphone) to download or send inappropriate, discriminatory, sexually explicit or offensive statements or materials. In addition, we should not use these technologies or systems to access illegal material, send unauthorized solicitations or conduct non-Company-related business.

We do not use confidential information for personal gain.

We use and share internal and external knowledge solely for the benefit of the Company and our professional obligations.

Ensuring Environment Sustainability, Personal Health, and Safety

As a good corporate citizen, we recognize our responsibility as an organization in playing an active and positive role in supporting a successful and sustainable society from the broad perspective of the future of the earth and humanity.

We should consider the potential impact of the activities, products, and services of the Company on human health and environment and should take necessary measures, over and above legal requirements, to reduce detrimental impacts of our business operations.

People are our Company's most valuable asset. We must therefore be committed to the highest standards of health and safety to protect ourselves and our stakeholders.

- We understand and comply with the law and related company policies and procedures in areas that are subject to safety and/or environmental regulations including the use of personal protective equipment provided
- We follow incident reporting procedures if we sustain a work-related injury, or if we ever aware of, or suspect, any unsafe working conditions or other safety issues.
- If you have any concerns about your health at work or the health of a co-worker, promptly contact our site Health Services (Medical Clinic).
- We check all of the working equipments and machineries before starting to work and after leaving the work to make sure they are in safe condition and do not impose any hazards that lead to losses.
- We do not smoke in the working are because it will create safety hazards.
- We do not consume alcohol, illegal drugs, controlled substances, or medication which may impair our ability to perform our job and job performance, at work

We must ensure that employees, contractors, and visitors are well informed, and given appropriate training and guidance to enable them to carry out their tasks in a safe and competent manner.

We understand and uphold the importance of clean working environment to our health and work productivity.



Respecting Others

We believe in people and believe that people should feel passionate about coming to work.

We treat our colleagues, clients, and others with whom we do business with respect, dignity, fairness, and courtesy.

We take pride in the diversity of our workforce and view it as a competitive advantage to be nurtured and expanded. By valuing our similarities and differences, we build upon our strengths and enhance our work environment.

We are committed to provide a work environment free of unlawful harassment. Sexual harassment and harassment based on age, race, religion, caste, ethnic origin, disability unrelated to the role, marital status, sexual orientation, pregnancy/ childbirth, or any other is prohibited.

We build relationships with each other based on a shared trust and confidence that each of us has a personal and professional commitment to do the right thing.



If mistakes are foreseen and done; directions, warnings, opinions, or comments should be made in professional and objective manner. The recipient should not take any warnings or directions personally but as a professional and constructive criticism to improve, grow, and / or correct the mistakes.

We consult with each other and value the perspectives of those who are different from us, as well as those who challenge our own point of view.

We are committed to communicating openly and honestly.

We respect the privacy of others. We should not share employees' personal information with anyone, either inside or outside our Company, who does not have a legitimate business need to know.

We avoid behavior, jokes, or otherwise inappropriate comments that may interfere with work performance or contribute to a hostile work environment

We try to balance work and private life and help others to do the same.

Integrity in Everything We Do

We will comply with applicable laws, internal company policies and rules, abide by sound social norms, and take appropriate action against any illegal or criminal acts or acts in violation of the company's policies and rules.

- Personnel involved in international trade must be familiar and compliant with all applicable laws, regulations, and restrictions relating to import, export, boycotts, customs and embargoes.

We protect our clients' and other stakeholders' trust by adhering to our professional work standards, which are designed to achieve objectivity in our work. In doing so, we strive to ensure our independence is not compromised or perceived to be compromised.

If we find ourselves in a potential or actual conflict of interest situation, we must immediately report it to our manager.

We engage only in practices that are ethical.

We should not as a principle, solicit or accept gifts, bribes, cash, or enjoy any special privileges from any business associate. We should not accept offers to be entertained by an individual or organizations with which our Company transacts business.

We will not offer any gifts, favors or entertainment to others that are:

- Not consistent with customary business practice.
- Excessive in value and / or could be construed as a bribe or pay-off.
- In violation of applicable laws or ethical standards.
- Such that public disclosure could have a negative impact to the Company or oneself.

- Invitations to occasional lunches/dinners hosted by our business associates may be accepted, if it serves the purpose of enhancing the relationship by informing the immediate superior.
- It is essential that in the event of accepting complimentary or attending occasional lunches/dinners, we should be certain that it will not impair our objective judgement or being construed as having influenced the judgement.

We report any attempt by a customer, vendor, or any other third party to influence us by offering something of value.



Nourish the Team Development

We work together in a collaborative manner as a team – within our department and with other departments – towards the achievement of business objectives, putting the interests of the team and the Company before our own as part of the PT. PAKERIN family.

We understand that individual or one department achievements will not be enough without the collaborations with other departments or PAKERIN's stakeholders. Therefore, we should not just find who is responsible for particular issues, instead we should work together to solve those issues.

We foster a culture of open and honest communication within the team, and supervise the work of others effectively.

We provide feedback that will enhance the skills of others by sharing required information with each other, learn from each other, and contribute towards making the experience of working in PT. PAKERIN enjoyable

We characterized our leadership with the notion of leader as teachers, a willingness of a leader to say "I don't know", and a desire to create the environment of learning and discovery.

We encourage and support professional development and intellectual curiosity of our employees, promote individual achievement, and continuous learning consistent with the needs of the business.

We understand that we are limited by our mental models / beliefs. Learning requires us to unveil our mental model and defensive layers and accept the others' point of view.

We ensure that our team has the right skills and experience to serve our client's needs.

During the collaboration with external parties or consultants:

- We should treat the external parties or consultants as part of our team and provide supports whichever possible to produce smoother, efficient, and effective working process.
- We should learn as much information and knowledge as possible to sustain the expertise within the organization.



FRAMEWORK OF ETHICAL DECISION MAKING

1. Recognize the event, decision or issue



- Understand the whole situation and the impact. Is there any potential illegal or unethical conduct arises in the event?
- Get as much information as possible so that we can make better decision

2. Think before you act



- Summarize and clarify your issue
- Consider all options and the consequences
- Consider who might be affected

3. Decide the course of action



- Determine the course of action in accordance with your job responsibilities
- Refer to PT. PAKERIN's policies and procedures
- Assess the risk and how you could reduce them
- Determine the best course of action

4. Evaluate your decision



- Refer to the Code of Conduct
- Ask yourself "Are you absolutely certain with your decision?"
- Seek consultation or support if we are unsure about the proper business conduct

5. Re-evaluate the decision



- Ask yourself "Are you absolutely certain with your decision?"
- Do you receive a satisfactory answer from the previous consultation?
- Escalate and consult with more appropriate person – enlist their opinion of your planned action

6. Proceed with care and confidence



- Communicate decision and rationale to stakeholders
- Reflect upon what was learned
- Share your success stories with others – where appropriate.

ETHICS QUESTIONS TO CONSIDER

1. Does it feel right?
2. Am I upholding the values of PT. PAKERIN?
3. Am I compromising my integrity or the integrity of PT. PAKERIN? What will other people perceived about my actions?
4. Would my actions damage the reputation of PT. PAKERIN?
5. How would it look in the news? Would you be embarrassed if others knew you took this course of action?
6. Who else could be affected by this?
7. Are my actions legal and in compliance with the standards of our profession?
8. Is my choice of action the most ethical among the possible alternatives? Do I feel good about my choice?
9. Am I treating others the way I expect others to treat me?
10. If I document my decision, would a reviewer agree with the action I have taken?
11. Have I consulted appropriately with colleagues?
12. Can you sleep at night?



COMPLIANCE WITH OUR CODE

Anyone who violates our Code or the policies it is based on, regardless of title or tenure, may be subject to discipline, up to and including warnings and termination of employment. The following actions may subject partners and employees to discipline:

- Violations of PAKERIN's policies, regulations, and Code of Conducts
- Directing or encouraging others to violate PAKERIN's policies, regulations, and Code of Conducts
- Interfering, providing false information, or being uncooperative during the investigation
- Violations of laws also can trigger governmental legal action

Where to Find Supports

In developing the Code of Conduct, PT. PAKERIN recognizes that no code can cover every eventuality — and that from time to time we may require the advice and support of others in addressing some situations arose during the normal course of daily business life.

To promote and help each of us live up to the commitments, PT. PAKERIN have created a support network that is available for consultation and advice.

Here are some of the places where you can seek for advice and guidance, in the following order:

- The managers or above in your line of reporting within the organizations
- HR Department who have been appointed to resolve personnel and work ethics related issue
- The Code of Conduct Committee
- Directors of PT. PAKERIN

While you should choose the channel you feel most comfortable with, resources closest to the situation are often in a better position to resolve an issue. This usually means your manager or direct supervisor. Depending on the issue, you may wish to consider other channels of communication.

For human resources-related concerns, including harassment, discrimination, and issues involving individual behavior or your work environment, your Human Resources manager may be an appropriate channel.

