

WIPOLIMEX RAYA GROUP

Jl. S. Parman No.41, Medan

Company Ethics policy

Company Statement and Commitment

In carrying out its business activities, Wipolimex Raya Group (PT. Wipolimex Raya and PT. Poly Bangkinang Raya) must pay attention to ethics both internal and external to the Company. Ethics are moral values and norms which become a guideline for a person or a group in regulating their behavior. Company Business Ethics is an explanation of how the Company as a business entity behaves, behaves and acts in an effort to balance the interests of the Company with the interests of all stakeholders.

Wipolimex Raya Group (PT. Wipolimex Raya and PT. Poly Bangkinang Raya) is committed to conducting its business in an honest and professional manner and complying with applicable local, national, and international laws on human rights, labour, land use, and the environment, as well as all relevant governmental laws, rules, and regulations

Scope

The Policy applies to all of the employees, as well as shareholders, vendors, contractors, and/or any other parties with a business relationship with . Wipolimex raya Group. Any investigative activity required will be conducted without regard to the suspected wrongdoer's length of service, position/title, or relationship to the Company. All parties should read and follow our company policies. If they have any questions, they should ask Human Resources (HR) department.

Corruption

Every company Individual is not permitted to offer or accept bribes, or to directly tell others to do it for the benefit of the person who is concerned. Corruption in all of its forms is not permitted.

1. To acknowledge that the prevention, detection and reporting of any attempt act or act of Bribery and Corruption is the responsibility of the employee.
2. To acknowledge that any employee who violates this Policy will be subject to disciplinary action, which can result in termination of employment.
3. Not accept or receive any gift in any form from Third Parties.
4. Not offer or transfer any gift in any form to Third Parties.
5. Not give, transfer, promise or offer any gift, money, invitation, service or hospitality to Public Officials or Third Parties for any purpose.
6. Report any offer or transfer of a gift, money invitation, service or hospitality to the employee, including suspected attempted act or act of Bribery or Corruption.

Measures

- Company builds a strong anti – corruption spirit at workplace.
- Company conducts regular audits at suppliers and employees to prevent any form of bribery
- Employees are required to disclose all outside-office invitations to events with company related external parties, and may only attend upon approval from management.

Conflict Of Interest

Conflict of Interest is a condition where by a company's personnel in carrying out their duties and obligations have interests outside the interests of the department, both involving personal, family, and other parties' interests so that the company's people may lose their objectivity in making decisions and policies according to the authority that has been given to him.

WIPOLIMEX RAYA GROUP

JL. S. Parman No.41, Medan

1. Refrain from participating in transactions with the company which could result in personal profit
2. Refrain from any gift, compensation or benefit with from any person or organization who aims to influence the employee's professional judgment. This includes any person or organization with whom the employee may transact business on behalf company.

Fraud

Fraud is an act of deviation or deliberate omission to deceive, deceive, or manipulate the Company, or other parties, which occurs within the Company and / or uses Company facilities so as to result in the Company or other party suffering losses and / or the fraudster obtains financial benefits directly or indirectly. The types of actions that are classified as fraud are: Fraud, Cheating, Asset embezzlement, Information leak, Other wrong actions.

1. Disclosing confidential and proprietary information to outside parties
2. Accepting or seeking anything of material value from contractors, vendors, or persons providing services/materials
3. Any dishonest or fraudulent act
4. Misappropriation of funds, securities, supplies, or other assets
5. Improperly in the handling or reporting of money or financial transactions

Money Laundering

Money laundering, It is the process of showing the source of money obtained from illegal income as a legal income. It is not possible to use illegal revenues freely and in a short time because the revenues obtained from illegal activities are generally cash. Therefore, criminals aim to prevent the detection of their guilt by hiding criminal elements through money laundering activities. Money laundering is a dangerous crime. If detected, people who launder money are given large fines and prison sentences, under Indonesia law.

1. Transfer or layering

It is prohibited to take actions by transferring assets originating from criminal acts that have been successfully placed with one financial service provider to another financial service provider.

2. Placement

It is prohibited to carry out the act of placing an amount of cash which is also sourced from a criminal act into the financial system (Banks/Other Financial Institutions).

3. User Wealth or Integration

It is prohibited to take action in using assets originating from a criminal act that has been placed in the financial system and transferred as if it were personal and lawful assets.

Anti-Competitive Practices

An anti-competitive practice is an action conducted by one or more businesses to make it difficult or impossible for other companies to enter or succeed in their market. The market distortion resulting from anti-competitive practices can result in higher prices, poorer service and a stifling of innovation, among other effects. As such, anti-competitive practices are illegal.

Prohibited of:

1. **Monopolization** – one or more persons or companies totally dominates an economic market.
2. **Unfair Competition** – an attempt to gain unfair competitive advantage through false, fraudulent, or unethical commercial conduct.

WIPOLIMEX RAYA GROUP

JL. S. Parman No.41, Medan

3. **Price Fixing** – an agreement among competitors to raise, fix, or otherwise maintain the price at which their goods or services are sold.

Information Security

Information security is a set of practices designed to keep personal data secure from unauthorized access and alteration during storing or transmitting from one place to another.

Information security is designed and implemented to protect the print, electronic and other private, sensitive and personal data from unauthorized persons. It is used to protect data from being misused, disclosure, destruction, modification, and disruption.

1 Confidentiality - The prevention of unauthorised disclosure of information

1. Integrity - The prevention of unauthorised change to information

2. Availability - The appropriate setting of accesses and security levels to prevent unauthorised access and maintain those that are legitimate

Measures

1. Provide adequate and safe storage media. Company provides file cabinets with lock feature at each department to protect data confidentiality.
2. Key to every office is held by only few, relevant personnel, mostly department heads
3. At least one staff is always present in offices with sensitive data during work hours.
4. CCTV installed in offices and factories.
5. Sensitive data can only be accessed by related personnel, such as top management and or department heads.
6. Non relevant personnel strictly does not have access to sensitive data base.

Disciplinary Actions

- Company takes strong disciplinary action against employees who fail to comply with company ethics policy.
- These include written warning, demotion, transfers, suspensions and immediate dismissal
- Company also takes legal actions against cases of corruption, theft, embezzlement, where appropriate.
- We regularly check our progress on company commitments to evaluate performance and keep us on course.

Company shall report publicly on progress and outcomes of policy-related commitments at least annually to ensure transparency and accountability

Company shall integrate its commitments into decision-making processes, systems, and performance metrics across corporate management, relevant business units, joint ventures, affiliates, and subsidiaries

**Updated by the management of Wipolimex Raya Group
31 July 2025**