

## BMJ BUSINESS CONDUCT

### A. Social and Ethics

#### 1. Human rights

We must always conduct our operations in a way that respects the human rights of our Employees, the people we work with and the communities in which we operate. BMJ fully supports the Indonesia Law on Human Rights (as stipulated in article 1 of law No. 39 of 1999 concerning human rights) (UU No. 39 tahun 1999 Pasal 1) and the 1945 constitution (UUD 1945) as well as commits itself to respect all International Labor Organization (ILO) core labor standards as set out below.

##### a. Banning of child labor

BMJ undertakes not to employ children in violation of conventions in accordance with the law No. 13 of 2003 concerning manpower article 68 (UU No. 13 tahun 2003 Pasal 68). In any case, BMJ will apply the age of 18 as the minimum age for employment, except in the framework of internship- or vocational training programs, organized in co-operation with schools and training institutes or approved by the competent authority.

##### b. Banning of forced labor

In accordance with the Law No. 19 of 1999 concerning Ratification of the ILO Convention No. 105 Concerning The Abolition of Forced Labor (ILO Convention on the Abolition of Forced Labor) (UU No. 19 tahun 1999), BMJ will under no circumstances make use of forced or bonded labor, such as forced labor by persons placed in an institution, or compulsory labor including labor as a means of political coercion or education.

##### c. Right to organize and collective bargaining

In accordance with the 1945 Constitution article 28 and article 28E paragraph (3) (UUD 1945 Pasal 28 & 28E Ayat (3)), The Law (UU) No. 39 of 1999 concerning human rights article 24 paragraph (1) (UU No. 39 tahun 1999 Pasal 24 Ayat (1) and the Law (UU) No. 13 of 2003 concerning manpower article 104 (UU No. 13 tahun 2003 Pasal 104). BMJ recognizes and respects the freedom of its employees to choose whether to establish or to associate with any employee organization of their own choosing (including labor unions).

The employment of a worker is not contingent upon the condition that he/she joins or not joins a union or be forced to relinquish trade union membership. Furthermore, union membership shall not be the cause for the dismissal of - or otherwise prejudice against - a worker. BMJ will not interfere with or finance labor organizations or take other actions with the intent of placing such organizations under its control.

BMJ and the respective employee organizations will co-operate constructively in a spirit of good faith. Even in cases of dispute the goal shall always be to maintain viable co-operation in the long term. This implicates, amongst others, the mutual respect of agreed commitments.

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**d. Equal opportunities / Non-discrimination**

In accordance with the law No. 40 of 2008 concerning the Elimination of Racial and Ethnic Discrimination (UU No. 40 Tahun 2008), BMJ is committed to an inclusive work culture and appreciates and recognizes that all people are unique and valuable and should be respected for their individual abilities. BMJ does not accept any form of harassment or discrimination based on gender, religion, race, national or ethnic origin, cultural background, social group, disability, marital status, age or political opinion.

BMJ shall provide equal employment opportunity and treat all employees fairly. BMJ employees and business units shall only use merit, qualifications and other professional criteria as the basis for employee-related decisions in BMJ, regarding for instance recruitment, training, compensation and promotion.

**e. Remuneration**

In accordance with the Law No. 11 of 2020 concerning work copyright in the labor section and Government Regulation No. 36 of 2021 concerning wages (UU No. 11 tahun 2020 dan PP No. 36 tahun 2021), It is acknowledged and agreed that all employees of BMJ are entitled to adequate remuneration. Remuneration and all the other benefits are based on the principle of fairness and comply with the individual national legal standards or the standards of the national branches or company collective labor agreements, whichever is higher.

**f. Working time and paid holidays**

BMJ makes sure that the national regulations and agreements on working hours and regular paid holiday are complied with in accordance with law No. 11 of 2020 concerning work copyright in the labor section and Government Regulation No. 35 of 2021 Work agreement for a certain time (PKWT), outsourcing, working time-rest time, termination of employment (PHK) (UU No. 11 tahun 2020 dan PP No. 35 tahun 2021).

**g. Privacy and Personal Information**

In accordance with the Law No. 27 of 2022 concerning Protection of Personal Data (UU No. 27 tahun 2022). BMJ respects the privacy of all persons and will use reasonable care to maintain the privacy and confidentiality of personal data. BMJ complies with applicable laws and regulations related to the protection of personal information and do not tolerate unauthorized disclosure of or access to such data.

**2. Human rights management**

We are committed to promoting human rights in our sphere of influence, including our supply chain. All our suppliers are expected to meet the requirements of our Supplier Code of Conduct, and this is incorporated into our contractual arrangements with suppliers.

We are committed to fully investigating and remediating any human rights issues identified in our operations and to strive for continuous improvement. If we identify human rights breaches in relation to a supplier, but there is no clear commitment to corrective action, persistent inaction or a lack of improvement, then our work with that supplier should cease.

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## **B. Health, safety and welfare**

We must provide, and maintain, safe and healthy working conditions. We place a high value on the health, safety and welfare of our Employees, and are committed to providing a safe working environment, to prevent accidents and injury, and to minimize occupational health risks. Our Quality, Health, Safety Environment and Energy Policy is based on local and international labor laws and standards. We comply with all relevant health and safety laws and regulations.

### **1. Health and Safety management**

We recognize the importance of the health, safety and welfare of all our Employees, contractors and non-company personnel in the successful conduct of our business.

The Company

We must:

Adopt health and safety procedures consistent with our Quality, Health, Safety Environment and Energy Policy or national law (whichever is the higher).

All Employees must:

- a. Take reasonable care of the health and safety of themselves and others while at work;
- b. Cooperate fully in all health and safety-related matters;
- c. Not interfere with or misuse equipment provided for safety; and
- d. Report any unsafe conditions in accordance with our Quality, Health, Safety Environment and Energy Policy.

### **2. Safeguarding employee well-being**

We place a high value on the well-being of our Employees, and are committed to providing a safe working environment to prevent accidents and injury, and to minimize occupational health risks. We will work continuously to maximize the physical security of our Employees, ensuring that our policies and standards are understood, and that training is provided, so everyone is aware of the health, safety and security issues and requirements relevant to their work.

## **C. Environment**

We are committed to excellence in environmental management across our business operations and throughout the wider supply chain that we influence.

BMJ is therefore committed to:

- a. Complying with all applicable legal and regulatory requirements governing environmental management.
- b. Implementing environmental management standards and practices internally, which has been designed using the principles of the international environmental management system standard ISO 14001.
- c. Monitoring and verifying compliance and identifying best practices, using our internal auditing systems and processes.
- d. Assessing the environmental impacts across our value chain, which includes future operational changes, and proactively putting in place plans to eliminate, reduce or mitigate these impacts.

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- e. Adopting circular economy principles to help us deliver better products, creating efficiencies in our operations, offering our employees opportunities to innovate and ultimately reduce the overall environmental impact across our value chain.
- f. Monitoring our performance through a set of key metrics and setting targets for continuous improvement in reducing our environmental impacts and publishing our targets and performance annually.
- g. Providing training and increasing awareness of our employees and stakeholders, including of our environmental impacts, as well as our Quality, Health, Safety Environment and Energy Policy statement, ensuring that they have the knowledge, tools and resources to support implementation of our programs.
- h. Working toward to including environmental considerations in our product design using product Life Cycle Analysis (LCA).
- i. Working with suppliers, service providers to reduce the environmental impacts of our products and services across their lifecycle, sharing good practices on environmental management and encouraging them to measure and manage their business in an environmentally responsible way.
- j. Undertaking proactive long-term engagement and collaboration with key stakeholders through open dialogue, to better understand emerging issues, regulatory or societal expectations, and technological innovations. We will work with governments, academics and other key stakeholders to develop effective and environmentally responsible solutions to the challenges that we face.

Specific to our industry, we have identified four priority areas that we will focus on:

**1. Tackling Climate Change**

- a. Working to achieve carbon neutral operations and toward net zero across our value chain.
- b. Start implementing our energy provision from renewable sources in non-production areas.

**2. Water Stewardship**

Reducing the amount of water withdrawn and increasing water recycling across our operations.

**3. Eliminating Waste**

- a. Working towards eliminating single use plastics from our packaging.
- b. Reducing waste generation across our operations.
- c. Working towards 100% Zero Waste to Landfill.

**4. Protecting Biodiversity and Forests**

- a. Progressing our commitment to no gross deforestation and working towards net zero deforestation of managed forests and net positive impacts on forests in our pulp raw material supply chain.
- b. Continuing to work with our suppliers to develop, advance and implement environmentally responsible and biodiversity protection best practices.

All Employees are encouraged to contribute to our environmental management efforts by:

- a. Understanding their personal environmental impact and identify opportunities to use resources responsibly;
- b. Ensuring they are familiar and comply with all environmental laws and regulations and our Quality, Health, Safety Environment and Energy Policy;
- c. Ensuring that our suppliers and partners comply with the minimum standards for environmental sustainability set out in our Supplier Code of Conduct; and
- d. Reporting any non-conformances in accordance with our Quality, Health, Safety Environment and Energy Policy.

## **D. Personal and business integrity**

### **1. Anti-bribery and corruption**

BMJ has a zero-tolerance approach and is committed to working against bribery and corruption in all forms. It is wholly unacceptable for the Company, Employees or our business partners to be involved or implicated in any way in bribery or other corrupt or criminal practices, including fraud, embezzlement or extortion.

### **2. No bribery**

Bribing a Public Official is a crime in almost every country. In many, it is also a crime to bribe employees or agents engaged in private business (such as our suppliers).

All Employees must never:

- a. offer, promise or give any gift, payment or other benefit to any person (directly or indirectly), including a Public Official, to induce or reward Improper Conduct or improperly influence, or intend to improperly influence, any decision by any person to our advantage
- b. ask for or accept, agree to accept or receive any gift, payment or other advantage from any person (directly or indirectly) as a reward or inducement for Improper Conduct or which improperly influences, or gives the impression that it is improperly intended to improperly influence, decisions of the Company.

### **3. Gifts and entertainment**

Any Gifts and Entertainment the employees offer, give or receive must:

- a. never be given/accepted if it can constitute bribery and corruption, as defined in the Anti-Bribery and Corruption Policy
- b. be given/accepted in an open way
- c. be lawful in all relevant jurisdictions, and not prohibited by the other party's organization
- d. not involve parties engaged in a tender or competitive bidding process
- e. not have, or be capable of being seen to have, a material effect on a transaction involving our Company
- f. not be a gift of cash or cash redeemable equivalent (vouchers, gift certificates, loans or Securities)
- g. not be asked for or demanded not be offered for something in return (i.e. offered with conditions attached)
- h. not be, or give the appearance of being, lavish or inappropriate (disrespectful, indecent, sexually explicit or might otherwise reflect on Company poorly, having regard to culture)
- i. be approved in writing in advance (where approval is required by this policy and/or additional local requirements)
- j. be expensed in accordance with the applicable business expense policies and procedures

## **E. Corporate assets**

### **Data privacy, confidentiality and information security**

Confidential information is any information, material or knowledge not generally available to the public that relates to the Company, our Employees, customers, business partners or others we do business with. Confidential information may prejudice the Company's interests if disclosed to third parties. The way we obtain, use

or otherwise handle confidential information, whether relating to the Company or third parties, can also breach applicable laws or other Company policies.

Examples of confidential information include:

- a. sales, marketing and other corporate databases
- b. pricing and marketing strategies and plans
- c. confidential product information and trade secrets
- d. research and technical data
- e. new product development material
- f. business ideas, processes, proposals or strategies
- g. unpublished financial data and results
- h. company plans
- i. personnel data and matters affecting Employees
- j. software licensed to or developed by BMJ.

## **F. National and International trade**

### **1. Sanctions and export controls**

We are committed to ensuring that our business is conducted in compliance with all applicable sanctions and export control regimes, and that we do not engage in any transactions involving or benefitting any Sanctioned Parties where it is prohibited to do so.

Sanctions and export controls Sanctions include prohibitions or restrictions on the following (whether direct or indirect):

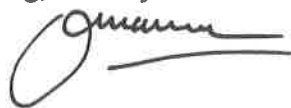
- a. exports, re-exports or trans shipments of products or services to/ through a Sanctioned Territory
- b. imports from, or dealings in products or services originating from, a Sanctioned Territory
- c. investments, Merger & Acquisitions (M&A) transactions and other dealings involving a Sanctioned Territory or Sanctioned Parties
- d. making funds or resources available to designated parties
- e. making/receiving payments to/from Sanctioned Territories or Sanctioned Parties
- f. transfer of restricted software, hardware, technical data or technology to particular Sanctioned Territories by physical shipment, email, download or even hand carry when visiting the Sanctioned Territory.

We must be aware of, and fully comply with, all applicable sanctions regimes and export controls affecting our business.

### **2. Anti-counterfeiting and Illicit Trade**

BMJ commit and ensure that our business practices only support legitimate trade. We follow our Know Your Customer (KYC) and Know Your Agent (KYA) procedures to support our Anti-counterfeiting.

Karawang, January 01<sup>st</sup> 2023



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