



**RESPONSIBLE RESEARCH POLICY**



## 1. Background

Tomypak Holdings Berhad (“Tomypak”) is committed to sustainable practices within the flexible packaging industry. This Responsible Research Policy ensures that our research and development activities are aligned with environmental stewardship, integrating innovation and growth with our sustainability commitments.

## 2. Scope

This Policy applies to all employees, contractors, and subsidiaries (collectively, “Covered Parties”) associated with Tomypak’s Research and Development (“R&D”) -related operations, products, and services. It encompasses all R&D-related facilities, processes, and activities within the organisation.

## 3. Policy Statement

This Responsible Research Policy (“Policy”) establishes guidelines and a framework for Tomypak’s research culture to promote responsible development and innovation. It supports Tomypak’s aspiration to lead innovation in the flexible packaging industry while upholding our commitments to environmental stewardship, regulatory compliance, and carbon footprint reduction.

We will achieve this through the following actions:

- a. Clearly defining the objectives and direction of each project before commencing any research activities.
- b. Ensuring that all development and innovation efforts promote sustainability and reduce environmental impacts by:
  - i. Reducing energy consumption in converting processes
  - ii. Using renewable or recycled material sources
  - iii. Reducing product carbon footprints
  - iv. Designing for recyclability to replace non-recyclable structures
- c. All innovations and research findings are owned by Tomypak.
- d. All materials used must adhere to our Food Safety, Health & Safety, and Environmental Policies, ensuring safety for employees, end users, and the environment.
- e. Screening technical properties and compliance for materials, including reviewing Technical Data Sheets (“TDS”), Material Safety Data Sheets (“MSDS”), and other compliance documents, in line with FDA and EU regulations, particularly for food contact materials.
- f. Proactively identifying and mitigating potential risks related to food safety, legal compliance, and customer requirements during the screening process.
- g. Regularly reviewing and updating the TDS and MSDS records to ensure accuracy.
- h. Outlining confidentiality requirements for research projects and ensuring confidentiality among interested parties; implementing Non-Disclosure Agreements (NDAs) between parties when necessary.
- i. After project completion, defining and implementing product specifications, with periodic reviews for relevance based on product study reports and customer requirements.
- j. Ensuring the responsible disposal of waste materials in accordance with Department of Environment (DOE) regulations for scheduled waste disposal.

## 4. Roles and Responsibilities

### 4.1 Sustainability Committee

The Sustainability Committee, chaired by the Managing Director, is responsible for overseeing the Responsible Research Policy. This includes ensuring its establishment, monitoring adherence within the organisation, and verifying compliance with relevant environmental regulations.



#### 4.2 Head of R&D Department

The Head of the R&D Department is responsible for implementing this Policy. He/she will ensure that R&D department personnel and related production teams adhere to the policy and actively participate in sustainability initiatives.

#### 4.3 Covered Parties

All Covered Parties are responsible for understanding and complying with this Policy, engaging in relevant training programs, and contributing to Tomypak's responsible research objectives.

### **5. References**

This Policy should be read in conjunction with the following policies and guidelines:

- a. Environmental Policy – for guidelines on sustainable practices and waste management.
- b. Health and Safety Policy – ensuring the safe use of materials and practices for employees and the environment.
- c. Food Safety Policy – related to materials and processes used in food packaging to meet global standards (such as FDA and EU regulations).
- d. Code of Conduct for Suppliers - ensuring that suppliers involved in research activities comply with ethical and environmental standards.

### **6. Review**

This Policy will be reviewed annually, or as necessary, in response to changes in legislation, industry standards, or company operations. Any updates or modifications will be communicated to all relevant parties.

### **7. Approval**

This Responsible Research Policy has been reviewed and approved by the Board of Directors. The Board will provide oversight to ensure that the implementation, led by management, aligns with the company's strategic goals and sustainability commitments.

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