



Shwe Taung Group

Anti-Corruption and Anti-Bribery Policy Statement

I. Introduction

The Shwe Taung Group of Companies (the Group) has always been rigorous in setting and enforcing anti-bribery and anti-corruption policies, both internally (in respect to the relationships between the companies and the employees) and externally (in respect to the relationships with suppliers, customers, partners, the different levels of Government and the community in general).

The spirit with which we have embraced these policies is not only that of fairness and integrity, but also of a bigger awareness that certain business practices need to be eradicated in order for the Country to develop to its full potential; and that the Group, as a leading business, has a responsibility of setting the example from within the Myanmar business landscape.

This document is intended to be a clarification of our existing policies and is part of a larger Code of Conduct which the Group will review, update and communicate periodically to ensure consistency with our values, mission and vision.

II. Definitions

Bribery is the action of giving money, property, gift, service fee, entertainment and other benefit to somebody in exchange for a benefit that otherwise would not occur or to influence the action or decision of a person in an official or public capacity.

Bribery contributes to Corruption, which is a form of dishonest or unethical conduct by a person in a position of authority, often to acquire personal benefit.

Favouritism, Nepotism and Clientelism involve favouring someone related, such as a friend, family member or member of an association. Examples would include hiring or promoting a family member or staff member to a role they are not qualified for, regardless of merit.

A Conflict of Interest is a situation in which a person related to the Group, such as employees, contractors, consultants and so on, is involved in external interests, which could possibly be not aligned with the Group's interests. Example would include appointing a friend or family member as supplier, when more qualified or more convenient suppliers are available, thereby causing a loss to the company.

III. Policy and Procedure

The Group conducts its business in compliance with all applicable laws and regulations. The Group is firmly and unequivocally committed to prevent and fight episodes of bribery and corruption. The Group has a **zero tolerance** for any behaviour, by individuals or organizations that act on behalf of the Group or represent it (such as agents, representatives or intermediaries), that can be interpreted as either committing or allowing, directly or indirectly, bribery.

No gifts (financial or otherwise, such as gadgets, hospitality, meals, invitations to events and so on) can be accepted by employees or directors when dealing on behalf of the Group. If gifts are received, regardless of their value, they cannot be retained and must be passed to the Admin department, which will proceed to distribute them for charitable and humanitarian activities. If gifts are received and cannot be given to the Administrative department for any reason, they must be declared in written form to the respective Managing Director and to the Admin Department, including specific reasons to explain why the gifts were received in the first place.

Accepting gifts, or failing to declare them, will result in disciplinary action, including dismissal and legal proceedings.

We prohibit facilitation payments, which are payments made to expedite or secure the performance of a route governmental action, by an official, political party or party official.

We do not provide any contribution of cash or in-kind support to any political party in Myanmar or overseas aimed of obtaining any improper benefit or advantage or any favorable treatment.

Any political and social contribution made must be approved by the Group's Ethics Committee and must adhere to the following:

- Comply with Myanmar laws and regulations
- Clearly identify recipient, organization, purpose, and reason for contribution

Anonymous donations and donations to individuals instead of organisations are not allowed.

Employees are obliged to disclose to their immediate superior and to the respective Managing Director any possible conflict of interests (such as relationships of kinship or partnership with existing or potential suppliers). Failing to disclose will result in disciplinary action.

Employees are strongly discouraged from behaviours that can be interpreted as clientelism, nepotism or favoritism. Any episode where individuals are hired, promoted or rewarded for reasons other than skills and merits will result in disciplinary action.

IV. Reporting of Breach of the Policy

We encourage our employees to raise their concerns and report any breaches of the Code of Conduct within the Group without fear of victimisation, demotion, penalty or dismissal.

We ensure full confidentiality of the whistle-blower and conduct independent investigation of any reported incidents. We shall maintain two-way communication with the whistle-blower for follow up on the investigation.

Employees who would like to report any incidents should first contact their immediate supervisor if appropriate. In the event of any conflict of interest, employees can reach out to the Group's Ethics Committee.

V. Implementation and Review

Employees (permanent or casual), directors, contractors, consultants, agents, suppliers shall be informed about this Policy and comply with it.

Employees and directors are also required to attend a mandatory internal anti-corruption anti-bribery training program.

Suppliers, contractors and sub-contractors need to sign a statement of acceptance of this Policy or Code of Business Conduct for Suppliers before dealing with the Group. These statements will be integral part of the contracts between the parties.

The books and records of the Group and each company controlled shall contain full and accurate information about all expenditures and transactions incurred. This allows for proper financial audits and prevents improper payments being made.

The Group will monitor the effectiveness of this anti-corruption and anti-bribery Policy and will review and update when needed.

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