



**Shwe Taung Group  
Code of Conduct**

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## **OVERVIEW**

This Code of Conduct applies to all employees and directors of Shwe Taung Group and all its related entities and subsidiaries (“the Group”). It sets out standards that should guide our behaviour, and our relationships with our stakeholders including our customers, suppliers, partners, and government agencies.

## **ORGANIZATIONAL CONDUCT**

### **Human Rights**

We fully support the United Nations’ Universal Declaration of Human Rights (“Declaration”).

We make sure that all our policies and practices comply with the fundamental principles described in the Declaration. This includes equal chance, right to life, liberty, security of person, as well as the freedom of thought, consciousness, religion, opinion and expression.

We are committed to address human rights risk, discover incidents of human rights abuse within the Group and act upon human rights related issues.

We are an equal opportunity employer. We do not employ child labour and we strictly condemn forced labour. We comply with minimum wage laws in Myanmar and we respect our employee’s rights to collective bargaining.

We view talent as a key asset of our Group and we offer a comprehensive and competitive remuneration and welfare package for our employees.

### **Anti-Bribery and Anti-Corruption**

We adopt a zero tolerance policy on bribery and corruption.

We do not offer or accept bribes including any offer, payment, transfer, or promise that have the purpose or effect of public or commercial bribery, acceptance of extortion, kickbacks, or other unlawful or improper means of obtaining or retaining business.

“Bribe” means money, property, gift, service fee, entertainment and other illegal benefit given or received without giving responsible price, with the purpose of bribery.

We fully comply with Myanmar’s Anti-Corruption Law 2013.

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.

Any breach of our zero tolerance policy on bribery and corruption can lead to termination or dismissal.

We expect our contractors, suppliers and partners, including all their employees, agents and subcontractors, to adopt the Group’s zero tolerance policy on bribery and corruption.

We review our anti-bribery and anti-corruption programme on an annual basis to check its effectiveness and propose improvements where applicable.

## Gifts and Hospitality

Employees should not accept gifts or favours from external parties such as customers, business partners and suppliers as they may lead to potential conflicts of interest.

Cash gifts are strictly prohibited. Receipt of gifts of any value must be declared to the Administrative department.

In the course of business, employees may be asked to attend business meals as part of hospitality. Under such circumstances, employees should seek internal approval to pay for the meal.

## Workplace Health and Safety

We are committed to providing a healthy and safe environment for our employees.

We provide appropriate training and equipment for our employees to equip them with the knowledge and equipment to perform their tasks safely.

We have in place enhanced precautionary programmes at sites with higher potential risks. For example, we have our own clinic with an oxygen concentrator at Shwe Taung Cement that is located in a remote site.

## Conflict of Interest

Employees are expected to always act in the best interest of the Group.

Conflict of interest arises when there is a conflict between the official responsibilities of an employee and any other interests that the employee may have which prevents the employee from acting in the best interest of the Group.

Employees must declare any conflict of interest to their supervisors.

It is not possible to comprehensively define circumstances that will lead to conflicts of interest. Employees are expected to consult their supervisors if they are unsure if they face any potential conflict of interest.

## Land and Property Acquisition

We respect people's rights to land and property and we commit to recognizing and protecting those rights, particularly the rights of those located near our operations.

We are committed to the following when acquiring land for our businesses:

- Conduct due diligence on the ownership of the land
- Identify environmental and social risks and impact to the community
- Engage with affected communities and stakeholders
- Introduce a grievance mechanism for feedback
- If resettlement is required, we will make public information on the resettlement sites, number of affected persons, and mitigation measures to restore livelihood of displaced persons

## Transparency

We practice the principle of transparency in our interactions with our stakeholders. We issue press releases for key announcements concerning the Group. Where required, we provide our audited financial reports to relevant governmental authorities. The Group and its subsidiaries have consistently been ranked among the top taxpayers in Myanmar.

## Political and Social Contributions

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

## Intellectual Property

We respect intellectual property rights and will not infringe or violate any company's intellectual property.

## **EMPLOYEE CONDUCT**

### Media Policy

All media queries and requests should be referred to the Corporate Communications Department (CCD). The media refer to the main means of mass communications comprising television, radio, print and the internet.

Only authorised representatives of the Group are allowed to speak to the media on behalf of the Group.

Employees who participate in social media should not claim to represent the Group or set up social media accounts for the Group.

### Privacy and Confidentiality

Employees are required to respect and protect confidential information about the Group. Confidential information is information that is not publicly available.

Employees should respect proper channels of communication for information, including confidential information, and should check with their supervisors if they are not sure.

## Whistle Blowing

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 should 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.

## COMMUNITY AND ENVIRONMENT

### Corporate Social Responsibility

Sustainability has always been at the core of the Group's strategy. Our activities are guided by our corporate vision "Inspiring Lives with Responsible Investment and Sustainable Development".

We are committed to being a good Corporate Citizen, contributing to the development of Myanmar. Our aim is to create value for stakeholders, while conducting sustainable business practices, caring for our community, and protecting our environment. Through our wide-ranging corporate social responsibility (CSR) engagement, we aim to become a catalyst of positive change that will enhance the lives of the Myanmar people.

More information about our CSR programme can be found in our annual Communication on Progress report submitted to the United Nations Global Compact.

### Environment

We recognise the need to respect the environment. We are fully committed to reducing our carbon footprint across all our operations and continue to develop tools to measure the outcomes of our progress in the direction of being more carbon neutral and environmentally sustainable.

Our environmental policy is articulated around three main pillars:

- Design, according to the principles of sustainability,
- Act, in order to reduce our environmental impact
- Champion, by raising awareness amongst our internal and external stakeholders

For all our major developments, we perform environmental impact assessments to identify environmental threats or opportunities relating the site and its surroundings.

More information about our efforts towards environmental sustainability can be found in our annual Communication on Progress report submitted to the United Nations Global Compact.

## **LEGAL AND COMPLIANCE**

We are dedicated to conducting our businesses consistently with the highest standards of business ethics and in accordance with applicable laws, rules and regulations in Myanmar at all times.

We expect our suppliers and partners, including all their employees, agents and subcontractors, to embrace the Group's commitment to integrity and responsibility in upholding the law at all times while conducting business with, for or on behalf of the Group.

## **IMPLEMENTATION AND REVIEW**

All employees and directors receive training on our Code of Conduct. Any breach of the Code of Conduct may result in disciplinary action taken against the employee or director.

We will monitor the implementation of this Code of Conduct on an annual basis to review its relevance and effectiveness. Where necessary, we will issue updates to the Code of Conduct.

## **CONTACT**

We encourage our stakeholders to contact us if they have any comments on our Code of Conduct.

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