

We expect any member of staff to let us know whenever they suspect there has been or might be an act of conduct contrary to our Code of Conduct or other policies. This includes any form of corruption, bribery, misuse of company funds, theft or any other form of behaviour that may be deemed illegal or otherwise contrary to the interests of KBZ Group of companies.

Such activities can seriously damage the reputation of our Group of Companies and will also have repercussions on our workforce. Any member of staff actively engaging in such activities will face reprimand up to and including summary dismissal for gross misconduct.

Any member of staff who is aware of such activities, or suspects that they are taking place (or will take place) is obligated to report them. Failure to do so may deem that the individual(s) is/are complicit with the act in question and also face serious reprimand.

Internal audit and other monitoring procedures are in place to ensure we identify such cases. We have a zero tolerance policy towards corruption, bribery, facilitation payments, conflicts of interest and abuses of human rights. Details are outlined in our Anti-corruption and human rights policies.

This policy is designed to help the Group, employees of all subsidiaries as well as third parties/ other stakeholders to avoid malpractice and illegal acts. Employees engaging in such acts will be reported to the relevant authorities and may face imprisonment and/or a fine.

KBZ is committed to follow the highest standards of responsible business activities to being a world leader in ethical business standards in accordance with our motto, 'The Strength of Myanmar'. We want our staff to be proud to work for KBZ Group and adhere to our core values as outlined in our Code of Conduct.

KBZ Group believes good employment practices stem from appropriate recruitment, high standard induction training, strong communications and regular consultation with staff and other stakeholders. We seek to empower our staff to enable them to maximise their potential. We do this by providing regular support through training, equal opportunities, competitive remuneration, a conducive work environment and high levels of health and safety. We want to demonstrate trust, respect and appreciation to all our team and listen to their ideas, views and concerns.

As a large organisation, with a workforce of more than 80,000 staff, we need to have a rigid process in place whereby reports of wrong-doing can be effectively reported without any risk of jeopardy for the whistle-blower. Dealing with issues at an early stage will help ensure that minimum harm is inflicted on either the Group or the individual(s) concerned.

In such a circumstance whereby a whistle-blowing issue is raised, we ensure that:

- ❖ •No whistle-blower will suffer demotion, penalty or other reprisals for raising concerns or reporting violations of any element of the Code of Conduct or other policies.
- ❖ •There is channel assuring full confidentiality and/or anonymity and two-way communication with the whistle-blower for any needed follow-up. The first reporting contact should be through an immediate superior if appropriate. Alternatively, the HR Manager in a particular subsidiary. At Group level, we also offer support through our central Legal & Compliance Department if required.

- ❖ •Parties can report a whistle-blowing issue if they are aware of any wrongdoing, including, but not limited to the following:
 - ➤ •fraud;
 - ➤ •misappropriation of assets;
 - ➤ •sexual harassment;
 - ➤ •criminal breach of trust;
 - ➤ •illicit and corrupt practices;
 - ➤ •questionable or improper accounting;
 - ➤ •misuse of confidential information;
 - ➤ •acts or omissions which are deemed to be against the interest of the company, laws, regulations or public policies;
 - ➤ •giving false or misleading information (including suppression of any material facts or information);
 - ➤ •breaches of Group Policies and Code of Conduct; or
 - ➤ •the deliberate concealment of any of the above matters or other acts of wrong doing

In all cases where a case of wrongdoing is being assessed, individuals or parties under scrutiny will be treated with respect and will have the right to be accompanied by a work colleague, a family member, a union representative or a legal representative.

Independent mediators may be engaged in more serious cases as deemed appropriate. The formal procedure to deal with whistle-blowing issues will be followed at all times providing clarity to all involved.



WHISTLE-BLOWING POLICY



KBZ GROUP

