

Max (Myanmar) Holding Co., Ltd & Its Subsidiaries

DOCUMENT NO:	COC001/2014	
DOCUMENT TITLE:	Code of Conduct	
DATE:	24 June 2014	REVISION NO: 001

Max Myanmar Code of Conduct forms an integral part of the terms of employment of all employee of the Max Myanmar. Our Code of Conduct reflects our commitments to meet the expectations of our stakeholders as a responsible corporate citizen, and contains the fundamental principles and rules concerning transparent and ethical business conduct.

We believe that how we achieve our business results is as important as the achievement itself. Max Myanmar insists all employees on full compliance and will not tolerate any misconduct.

Our five core principles

Customer	Customer benefits and satisfaction is our heart of business
Employees	We treat our employees with dignity, fairness and respect
Shareholders	We endeavor to outstanding and sustainable business performance ethically & with integrity
Business Partners	We work with our business partners based on mutual trust and mutual growth
Society	We aspire to be good corporate citizen

Customer - Customer benefits and satisfaction is our heart of business

Customer benefit and safety

We expect our employees in all areas of our business to focus on providing best customer services and innovative solutions while adhering to the respective laws governing those activities. We strive for the highest customer satisfaction. We listen to our customers and provide solutions that add value and create mutual benefit for both parties.

Customer information

We will endeavor to protect the personal information of customers and everyone else with whom we engage in business, in accordance with the letter and spirit of privacy laws.

Quality and safety

We discover, develop and manufacture high-quality products and services that meet all regulatory requirements, and pursue quality beyond compliance in both our products and processes. We protect our customer safety by identifying, assessing, managing and reporting any risks in a timely manner.

Employees - We treat our employees with dignity, fairness, and respect

Human rights

We respect and honor the human rights of people involved in our business and, in particular, do not use or tolerate any form of harassment, bullying and violence.

Fair working conditions

We commit to provide our employee fair and competitive wages based on performance and ethical conduct. We protect employee from unfair or unethical working conditions, including bonded, forced or child labor, or any unsafe working conditions.

Diversity

We treat our employee fairly, equally and respectfully. We expect employee to demonstrate respect toward each other and we do not tolerate any form of harassment or discrimination.

We seek to create an inclusive work environment where employee regardless of their backgrounds can contribute to their potential. We appreciate the diversity and individuality of our employee and do not discriminate based on personal characteristics such as nationality, gender, age, ethnicity, religion, sexual orientation or disability. We believe a diverse workforce is critical to our success. We therefore attract, develop and retain highly talented people with diverse backgrounds and inclusive mindsets.

Fair evaluation and development

The evaluation of an employee's performance considers both achievement on objectives as well as adherence to our values and behaviors. We offer opportunities for our associates to develop, grow and continuously improve individual skills to strengthen the competencies of Max Myanmar as a whole.

Business Partners - We work with our business partners based on mutual trust and mutual growth

Anti-bribery and corruption

We adopt zero tolerance to any form of bribery or corruption. We do not bribe any public official or private person and we do not accept any bribes. We always maintain honest and fair relationships with business partners, government agencies and public authorities.

Fair competition

We are committed to fair and free competition and will not breach competition laws and regulations.

Marketing practices

We market and sell our products and services in compliance with all applicable rules and regulations, and in line with high ethical standards. This commitment also applies to all our other activities relating to the commercialization of our products.

Commitment to all laws and regulations

We comply with all laws and regulations applicable to our activities. We also implement and comply with our internal policies.

Third party integrity

We expect third parties with whom we work to comply with the law, to adhere to ethical business practices, and to observe our standard requirements concerning labor, health, safety, environmental protection and management systems.

Shareholders - We endeavor to outstanding and sustainable business performance with integrity and ethically

Financial integrity

We do not compromise our financial integrity. Financial risks and operational measures must be appropriately reviewed and approved. We provide timely, accurate and complete financial information to our shareholders. We maintain effective controls over financial reporting to ensure a complete and accurate record of our financial transactions.

Business continuity

We believe that business continuity management is critical for our employees, partners, customers, associates and other stakeholders, and is part of responsible management practice. In the event of an emergency or significant business disruption, we are committed to doing our utmost to ensure uninterrupted supply of key products and services.

Safeguarding corporate assets

We work to protect assets of all business entities of Max Myanmar Holding Ltd. This applies to our employees, reputation, intellectual property, information, products, property and other assets. We properly use and maintain assets of Max Myanmar and ensure that they are protected from misuse, loss, theft and waste. We protect our investments in intangible assets by obtaining, enforcing and defending intellectual property (IP) rights and by maintaining confidentiality of sensitive information.

Information security

We protect the confidentiality, integrity and availability of critical information, regardless of its form and location.

Conflict of interest

Personal interests must not influence our business judgment or decision making. Associates must disclose actual or potential conflicts of interest to their supervisor. We recognized that a conflict of interest may arise without any willful action on our part of changes in circumstances may create a conflict or appearance of a conflict in situations where previously none existed. Disclosure is mandatory; failing to disclose a conflict of interest is a violation of the code.

Society - We aspire to be good corporate citizen

Corporate citizenship

Max Myanmar has a long standing, reputation as a responsible corporate citizen. To be responsible business entity, we strive to achieve business success in ways that reveal respect for people and planet and uphold the values and high standards of ethics. We demonstrate respect for people and planet that considering long term and short term impacts to the environment and community when we make business decisions. We are committed to the principles of UDHR and United Nations Global Compact, the world's largest corporate citizenship initiative.

Environmental management and compliance

A number of environmental laws, standards, requirements and policies apply to our business operations and practices. We follow the environmental requirements such as conserving energy, water, raw materials and other natural resources, and complying with environmental permits and health and safety requirements. We make efficient use of natural resources and minimize the environmental impact of our activities.

Transparency

We are open and transparent with respect to our business principles and practices and comply with applicable laws and regulations. We are responsible for preparing company policies, reports or contributing information, we ensure that the disclosures are accurate, reliable and complete.

Data privacy

We respect the privacy rights of our employees, customers, partners and other stakeholders. We inform individuals of collection and processing of their personal data, allowing them to make informed decisions and exercise their rights. We collect and process personal data for specific and legitimate business purposes only and secure such data against unauthorized access.

Corporate social responsibility (CSR)

By actively contributing to educational, social, ecological, cultural, and other projects and programs, we strive to contribute to the solution of societal problems. We enthusiastically promote and engage in social contribution activities that help strengthen communities to be enrichment of our society.

[Note: Approved by Group Chief Operation Officer on 24 June 2014.]