

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

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DOCUMENT TITLE:	<b>Corporate Communication Policy</b>	
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## Introduction

This policy is to establish guidelines for Max Myanmar Holding Co., Ltd for communications by the Company, including the release of material information about the Company to the general public, media, customers, potential investors, other stakeholders and employees itself.

This policy applies to all Max Myanmar Holding Co., Ltd.'s employees with respect to all information (general, confidential, or material) in whatever form or means, regarding the Company that is shared between the Company, employees, and other parties.

## Objectives

- To ensure material information is disclosed in a timely, consistent, and appropriate manner.
- To provide guidelines for the broad dissemination of material information pursuant to all applicable legal requirements.
- To prevent the improper use or premature disclosure of confidential material information.
- To provide direction for all Max Myanmar employees in the appropriate treatment of material, confidential, general, and routine Company information.
- To assist the Company in satisfying the objectives above, and in assigning responsibility for the implementation and oversight of these policies and procedures.

## Guiding Principles

Max Myanmar recognizes that active communication with different stakeholders and the general public is an integral part of good business practice and administration. In order to reach its overall goals for communication, Max Myanmar follows a set of guiding principles.

### 1. Transparency

- As a leading institution of Myanmar, we strive our communication to be as transparent and open as possible while protecting personal information and privacy. This contributes to maintaining a high level of accountability and responsibility.

### 2. Efficiency

- We uses modern communication technologies in a timely manner to convey its messages to its target groups. Synergies are sought when it comes to using different communication channels.

- Max Myanmar Holding Co., Ltd shall reply without undue delay to information requests by the media and the public.

### **3. Proactivity**

- Max Myanmar proactively develops contacts with its target groups and identifies topics of possible mutual interest.

### **4. Clarity**

- Max Myanmar aims at clarity, i.e., to send uniform and clear messages on key policy issues. We avoid unnecessary jargon in its communication. Max Myanmar reinforces clarity by adhering to a well-defined visual identity in its external communication.

### **5. Feedback**

- We actively and regularly seek feedback on its image and communication activities both from the media as well as from its key target groups. This feedback is used to fine-tune communication activities.

## **Types of Communication**

### **External Communication**

- External communication is an important area which supports Max Myanmar in pursuing the overall goals as described in its vision, mission and strategy.
- Customer relations (branding, marketing) and investor relations (name recognition) play an important role in the external relations of Max Myanmar.
- In addition, external communication can promote overall knowledge and awareness of Max Myanmar among different stakeholders.

### **Internal Communication**

- The main goal of the Max Myanmar internal communication is to support the organization in achieving the overall goals described in the vision and mission statement.
- Furthermore, the internal communication can strengthen the organizational culture and feeling of commitment among Max Myanmar Holding Co., Ltd.'s staffs.
- Timely and transparent and relevant information sharing is an important principle to ensure efficient internal communication.

## **Target Groups**

We have a variety of target groups for Max Myanmar Holding's communication systems.

### **External Communication**

## **Customers**

- Our customers are located in the private and public sectors from both domestic and international institutions.
- External communication should support the process of maintaining current customer relations as well as finding potential new customers.
- Customer relations (branding, marketing) play an important role in the external relations of the company.

## **Government and public administration**

Max Myanmar's activities and performances are accountable to disclosure for government and public administration bodies. Max Myanmar Holding Co., Ltd is responsible to its member companies for their actions, which creates a natural need to communicate.

## **Non-governmental organizations**

- Max Myanmar Holding analyses carefully all aspects of its activities, with special emphasis on competitiveness and the environment.
- It is important that we conduct a two-way dialogue and communicate our goals and environmental policy to NGOs.

## **Media**

We consider the media as an intermediary in reaching other key target groups. Especially, the media dealing with corporate governance, business ethic, human rights, environmental and economic issues are of high priority party for us.

## **General public**

The general public is an important stakeholder group for Max Myanmar.

## **Internal Communication**

### **Staff**

Our goal is to recruit and retain personnel that possess the competencies and skills required in order for the company to implement its strategy. Highly motivated staff coming from diverse background are an important multiplier for our external communication.

## **Basic Rules for Communication**

### **1. Responsibility for external and internal communication**

- In general, the CEO and Administration Director of a subsidiaries have the overall responsibility for our external and internal communication for respective company.
- However, the responsibility is shared depending on the key target groups. In internal communication, responsibility is shared by Administration Director and executive officer of Human Resources department.

## **2. Spokespersons for the company**

- As regards public statements on behalf of the Max Myanmar Holding Co., Ltd, a basic rule is that the key spokespersons for the company (i.e., persons giving on-the-record comments to the media) are Chairman of the Max Myanmar Holding Co., Ltd, CEO or authorized person of individual subsidiaries.
- However, decentralization of communication is sought whenever there are valid arguments for it: e.g., expertise or language skills.
- Prior consultation with the Communications is desirable in case information is given that is not in the public domain.
- The management and staff of Max Myanmar Holding Co., Ltd are encouraged to identify opportunities to be authorized to become a spoke person for external communication whenever possible.

## **3. Coordination of communication**

- Communication is an integral part of the company's overall business processes and key policy messages are discussed in the decision-making bodies of the company.
- When items are discussed in the decision-making bodies there should be a short suggestion on how they will be communicated both externally and internally.
- Information on public appearances by Max Myanmar representatives is to be sent in a timely manner to executive officer responsible for communications.

## **Communication tools**

### **External Communication**

#### ***Newsletter***

- Max Myanmar Holding Co., Ltd shall publish a newsletter to inform key target groups about its activities.
- The material to be used in the newsletter will be published on the Max Myanmar Holding Co., Ltd website.
- It could be used in a broader form in other publications such as each company's newsletter. CEO of a respective subsidiary has the overall editorial responsibility for the newsletter.

#### ***Annual Report***

- The Annual Report provides for an official account of the Max Myanmar Holding Co., Ltd activities for a calendar year.
- It is comprehensive by nature, as it serves as a future point of reference.

#### ***Internet***

- The website is the central platform for all external information our produces. It is up-to-date, reader-friendly and it clearly communicates company's mission.

- CEO of a respective subsidiary has the overall editorial responsibility for their company Internet site.

### ***Seminars***

- Max Myanmar organizes and participates not only in seminars with key target groups but also participates actively in panels, providing speakers or discussants for relevant sessions.
- With a view to its own seminars (e.g. lending seminars), efforts are to be made to serve to the media whenever appropriate.
- The CEO of the respective subsidiary is responsible for updating a calendar of these forthcoming events, which is to be published both internally and externally.

### ***Speeches***

- Chairman and executive members of the top management team will often be invited to give speeches on various topics.
- The most important public appearances are to be announced on the website.
- To the extent possible, short summaries of the speeches are to be published on the website and distributed at the venue to interested parties (including the press).

### ***Media activities***

- Max Myanmar Holding Co., Ltd sends press releases on its most important activities.
- While Chairman and/or CEO are responsible for the external communication and are the main spokespersons for Max Myanmar Holding Co., Ltd, pragmatic solutions for different communication situations are sought to find the relevant expertise and language combination to serve the interests of the company and the media.
- Interviews, background talks, and trips to locations of important projects are organized to inform the media of Max Myanmar Holding Co., Ltd activities.

### ***Advertising & sponsoring***

- Max Myanmar may use advertising and sponsoring to support its actions and to reach its key target groups.
- As a leading institution of Myanmar, Max Myanmar Holding Co., Ltd shall carefully consider the pros and cons of any such activity against defined criteria as advertising and sponsoring should support the activities of the Max Myanmar Holding Co., Ltd.

## **Internal Communication**

### ***Notice Boards***

- Notice boards is to provide communications material to be read at the employee's convenience.
- They are mainly intended for non-urgent news and information.

### ***E-mail/Fast-track News Bulletin***

- E-mail or fast-track news bulletin to all employees are to be used for quick dissemination of business/industry related news that all employees should be aware of.
- Line Managers are required to ensure that all their employees have read their e-mail or fast-track News Bulletins within two working days of issue where ever possible.

### ***Directors' Briefings***

- It is a program of business updates and an opportunity for line managers to meet directors and discuss business issues.
- Attendees are encouraged to ask questions and are required to cascade the information obtained from these sessions to their respective Teams.
- The main purpose is to allow for face-to-face meetings between directors and line managers and to update messages on business objectives, priorities and targets.

### ***Line Manager Team Meeting***

- Used by Line Managers to disseminate information about their respective Departments and the organization

### ***Valued Interviews***

- Valued interviews such as performance review and objective setting interview undertaken between the line manager and employees. This process includes an employee development element, which identifies learning and development needs.

### ***One-to-one Employee Briefings***

- Direct interface between line manager and employee to discuss a broad spectrum of issues including both business related and personal issues.

## **Communication Roles and Responsibilities**

All employees have the responsibility to ensure that the communication process in the organization works effectively, timely, and transparently in accordance with the communication policy.

### ***Executive Director***

- ensure that all important issues are communicated to staff in the organization in a timely and accurate manner
- determine the messages and the methods of appropriate communication
- ensure that all information, as far as possible, is communicated internally before communicated externally
- ensure that the management behavior and style is consistent with the principles in this document
- work in partnership with staff and their representatives, when the need arises
- ensure that managers are kept up to date with developments in the organization

## ***Managers***

- ensure that mechanisms exist in the departments to allow the free flow of information, upwards and downwards
- ensure that staff views are considered, and responses given where appropriate
- identify potential blocks to communication within the organization and remedy them
- actively provide accurate up-to-date information to prevent confusion and unnecessary communication problems as a result
- ensure that the opportunity exists for each member of staff to receive and give information
- responsible for delivering information, and obtaining the views of staff in a consistent manner.

## ***Staff***

- participate actively in the communication process in the organization
- when information is perceived to be inaccurate, or is unclear, communicate directly with the relevant manager(s) to address this
- provide accurate ongoing information regarding programs or processes to ensure efficiency and effectiveness of these
- Take responsibility for sharing appropriate information

## **Spoke Person**

1. In general, spoke persons are Chairman of Max Myanmar Holding Co., Ltd, CEO or authorized executive officer from a respective subsidiary.
2. Where the disclosure relates to financial statements, information derived from financial statements or financial projections, the CFO shall be deemed a spoke person.
3. The Spoke person has the responsibility to:
  - a. Update this policy regularly, including to take account of new developments and standards of practice;
  - b. Monitor the effectiveness of and compliance with this policy;
  - c. Educate the company's directors, officers and employees about the matters covered by this policy;
  - d. Review and authorize all written, electronic and oral disclosure before it is publicly disclosed;
  - e. Monitor the Company's website;
  - f. Meet as needed, but at least once six months, to discuss drafting responsibilities for public documents and to identify any areas of particular risk and sensitivity that require special care; and
  - g. Document, monitor and evaluate the disclosure controls and procedures and internal controls and procedures for financial reporting of the company.
4. The Disclosure Officers are responsible for determining whether information is material, the timely disclosure of material information in accordance with securities laws, monitoring compliance with the policy and overseeing the disclosure controls, procedures and practices of the company.

**[Note: Approved by Group Chief Operation Officer on 09 July 2014.]**