



Max Myanmar Holding Co., Ltd.

Whistle Blowing Policy

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Max (Myanmar) Holding Co., Ltd & Its Subsidiaries		
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DOCUMENT TITLE:	Whistle Blowing Policy	
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1.0 PURPOSE

The policy is created in order to comply with the requirements of Guideline 11.7 of the Singapore Code of Corporate Governance 2005. The purpose of this policy is to:

- provide an avenue for employees to raise concerns about wrongdoing or malpractice within the Company and its subsidiaries which they have become aware of
- provide reassurance that the employees will be protected from reprisals or victimization for whistle blowing made in good faith and without malice.

2.0 STATEMENT OF POLICY

The Company is committed to the highest standards of quality, honesty, openness and accountability, and encourages employees with serious concerns to come forward to express those concerns.

Employees raising concerns in good faith can do so without fear of reprisal or victimisation. The Company is committed to this policy. Employees who raise genuine concerns under this policy should not feel they are at risk of losing their job or suffering any form of retribution as a result. Provided they are acting in good faith, it does not matter if employees are mistaken or if there is an innocent explanation for their concerns.

- RESPONSIBILITY AND AUTHORITY

1st Level	Mr Soe Tint Chairman – Audit Committee	<ul style="list-style-type: none"> • Overall responsible for the update, approval & execution of this policy. • Contact point for the staff who wish to raise their concerns.
2nd Level	Mr Dennis Lim Group Chief Executives Officer	<ul style="list-style-type: none"> • Responsible for the update, approval & execution of this policy. • Contact point for the staff who wish to raise their concerns.
3rd Level	Our appointed Whistle Blowing Officers are: (1) Mr Andrew William Khine - Group	<ul style="list-style-type: none"> • Responsible for execution of this policy. • Contact point for the staff who wish to raise their

	Chief Financial Officer (2) Mr Aung Myo Saw – Head of Corporate Affairs & Planning	<p>concerns.</p> <ul style="list-style-type: none"> Responsible to maintain a central register of all concerns received and submit an annual report to the Audit Committee setting out the numbers of concerns received, the outcome of each investigation conducted together with any action plan for improvement which may have put forward by the investigation officers.
4th Level	<p>Chief executive officers- Subsidiaries</p> <ul style="list-style-type: none"> Mr. Kyaw Zay Myint – CEO (Max Energy Co., Ltd.) Mr. Phyo Wai Win – CEO (Max Myanmar Co., Ltd.) Mr. Khin Maung Kywe – CEO (Max Myanmar Construction Co., Ltd.) Mr. Sun Lin Wynn – CEO (Max Myanmar Hotel Co., Ltd.) Mr. Nyan Toe – CEO (Max Myanmar Manufacturing Co., Ltd.) Mr. Moe Aung Chaw – CEO (Max Myanmar Highway and Toll Collection Co., Ltd.) Mr. Maung Maung Thet - CEO (Shwe Yaung Pya Agro Co., Ltd.) 	<ul style="list-style-type: none"> Contact point for the staff who wish to raise their concerns. To raise the matter to the appointed Whistle Blowing Officers upon receiving feedback from the staff.

- SCOPES

This policy applies to all full-time, part-time and contract employees of Max (Myanmar) Holding Co., Ltd and its subsidiaries.

What types of actions are covered by the policy?

This policy is intended to deal with serious or sensitive concerns about such as the following:

- Financial frauds and malpractice
- Unauthorised use of Company money
- Corruption
- Unlawful acts
- A person abusing his/her position for any unauthorised use or for personal gain
- Non-adherence to major control policies (for example, removing of assets without proper approval)
- Deliberately conceal information tending to show any of the above.

What is not covered?

- A person being discriminated against because of their race, colour, religion, ethnic or national origin, disability, age, sex, home life, etc.
- Staff complaints about their employment

These complaints are dealt with through – Grievance Handling Policy

- Customers' complaints about our products/services

These complaints are dealt by the Customer Care Services.

- PROCEDURE TO FOLLOW

STAGE 1 – Who to Raise a Concern to

You can approach your immediate Director/Manager or our appointed Whistle Blowing Officers if you may be aware of any suspected misconduct within the Company. Their contacts are:

Personnel	Contact No	E-mail
Our appointed Whistle Blowing Officers are:		
(1) Mr Andrew William Khine Group Chief Financial Officer	+95-1-255-820	andrew@maxiasia.com.sg
(2) Mr Aung Myo Saw Head of Corporate Affairs & Planning	+95-1-255-833	aungmyosaw@maxmyanmargroup.com
Chief Executive Officers – Subsidiaries		
<ul style="list-style-type: none"> • Mr. Kyaw Zay Myint • Mr. Phyo Wai Win • Mr. Khin Maung Kywe • Mr. Sun Lin Wynn • Mr. Nyan Toe • Mr. Moe Aung Chaw • Mr. Maung Maung Thet 	+95-1-255-823 +95-1-255-823 +95-1-255-823 +95-1-255-823 +95-1-255-823 +95-1-255-823 +95-1-255-823	kzm@maxmyanmargroup.com phyowaiwin@maxmyanmargroup.com khinmaungkywe@maxmyanmargroup.com slwynn@maxmyanmargroup.com nyantoe@maxmyanmargroup.com moeagchaw@maxmyanmargroup.com mgmgthet@maxmyanmargroup.com

If you feel unable to raise the matter with your immediate Manager or our appointed Whistle Blowing Officers for whatever reason, or are not satisfied with the outcome of initial investigation, you can raise the matter up with the CEO, either personally or via e-mail.

If the above channels have been followed and you still have concerns or if you feel that the matter is so serious that you cannot discuss it with any of the above, you can e-mail only to the Chairman of Audit Committee, Mr. Soe Tint, at his email address soetint@maxmyanmargroup.com.

STAGE 2 – How to Raise A Concern

It is best that you could provide them with as much information as possible, including any relevant names, dates, and places and so on. You will have to show them that there are good reasons for your concern.

The earlier you raise a concern, the easier it will probably be to take effective action.

STAGE 3 – How We Response to Your Concerns

In dealing with your concern under this Policy, the chief executive officers and/or appointed whistle blowing officers have a responsibility to:

- Take concerns seriously
- Consider them fully and sympathetically
- Recognise that raising a concern can be a difficult experience for you and to offer support
- Investigate and resolve the matter as quickly as possible
- Ensure that you are informed of the outcome of the matter
- Ensure that there is no victimisation of you raising concerns
- Ensure that protection is offered if the concern comes with the legal definitions covered by established laws or legislation

They may require you to meet them during the investigation process. The amount of contact you have with them will depend on the nature of your concern, the potential difficulties involved and how clear the information you have provided. Meetings with the whistle blowing officers will normally take place in the Head Office. You may be accompanied by a friend or colleague during the meeting.

They will keep your concerns confidential and will not reveal your name or position without your permission or unless they have to do so by law.

ADDITIONAL POINTS TO NOTE

If the concern later turns out not to be justified, but was raised in good faith and without malice, you can still expect support. However, if you have raised a concern that later turns out to be malicious or brought in bad faith, you will be disciplined accordingly.

Any staff who try to discourage his/her colleagues from coming forward, or criticise or victimise them after voicing a concern, will be disciplinarily dealt with.

STAGE 4 – Monitoring & Documenting Concerns

The whistle blowing officers will maintain a record of concerns raised under this policy, the outcomes and areas of improvement (in a form which does not endanger confidentiality and where applicable, protect identity of the complainant).

STAGE 5– Periodic Reporting

The whistle blowing officers will report the concerns received, outcome of each investigation conducted and action plans for improvement to the Chairman of the Audit Committee during the half-yearly Audit Committee Meeting.

[Note: Approved by Chairman of Audit Committee and Group Chief Executives Officer on 02 May 2014.]

The end.