



EAC Holding Company Limited

No. 19, 4 Za (2-Kha), Corner of Baho Road and Nilar Street, (13) Qtr, Hlaing Tsp, Yangon, Myanmar. Tel : (+951) 2305300 Fax : (+951) 2305305, 2305305

Code of Conduct Policy

Objective

We expect all our employees to follow our code of conduct. We should avoid offending, participating in serious disputes and disrupting our workplace. We also expect them to foster a well-organized, respectful and collaborative environment. This policy applies to all our employees regardless of employment agreement or rank.

Compliance with Laws

We must protect our company's integrity. We need to comply with all environmental, safety and fair dealing rules and regulation of Myanmar laws. We expect all of our employees to be ethical and responsible when dealing with our company's finances, products, partnerships and public image.

Protection of Company Property

We will protect our company's property, whether material or intangible, with due respect and care. Everyone should protect company facilities and other material property (e.g. company cars) from damage and vandalism, whenever possible. Corporate Property which includes but is not limited to: premises, equipment, supplies, furnishings, Employee search accounts, funds, reports, records, vehicles, trade secrets, computer software, hardware and networks, internet accounts and intangible items such as the details of business application systems.

Employees are responsible for ensuring that: Company's assets are protected and not used for personal use unless otherwise authorized; Company's intellectual property is subject to copyright and is not reproduced, distributed or altered without authorization; as far as practicable, contracts are put in writing; and unless otherwise authorized Company's name or purchasing power is not used to obtain personal benefits, discounts or rebates.

Professionalism



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We are all committed to supporting a safe, healthy and positive workplace for all Employees. We will not tolerate behavior that interferes with an Employee's ability to perform his or her duties. The use or effects of alcohol or illegal drugs are not acceptable in our work environment. Responsible alcohol use may be acceptable in very limited circumstances as part of social or business events.

- Take Responsible for your action
- Do not Blame Other
- Do not tattle
- Be a Problem Solver

Corruption

All employees must never offer to provide anything of value directly or indirectly to government officials and business partners to secure an undue advantage. The company prohibits payment, offers of payment as well as anything of value directly or indirectly with the purpose of influencing or obtaining undue business or personal advantage.

Third parties will only be contracted to perform tasks which aid business interests provided: fees to be paid are reasonable; all arrangements are clearly documented; arrangements are in compliance with company's policies.

Payments of any nature, which would be in violation of any law, are prohibited. All payments of commissions and fees shall be in accordance with sound business practices. Payments, gifts or favors must not be made to any person with intent to induce them to violate their duties or to obtain favorable treatment for the Employee or Company.

Conflict of Interest

A conflict-of-interest situation arises when the "private interests" of the employee compete or conflict with the interests of the Company. "Private interests" means both the financial and personal interests of the staff or those of their connections including: family members and other close affiliates; personal friends; the clubs and societies to which they belong; and any person to whom they owe a favor or are obligated in any way.

Employee should avoid using their official position or any information made available to them in the course of their duties to benefit themselves, their affiliates or any other persons with whom they have personal or social ties. They should avoid putting



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themselves in a position that may lead to an actual or perceived conflict of interest with the Company.

Failure to avoid or declare any conflict of interest may give rise to criticism of favoritism, abuse of authority or even allegations of corruption.

In particular, staff involved in the procurement process should declare conflict of interest if they have beneficial interest in any company which is being considered for selection as the Company supplier of goods or services.

Use of Computer System & Software

Every effort should be made to protect Corporate Server and associated software from various threats to data security such as accidental or deliberate destruction of data or equipment, interruption of service, disclosure of confidential information, theft or corruption of data. Any security concerns with respect to our systems or software, or any viruses or data network attacks, weaknesses or unexplained system changes should immediately be reported to the Chief Technology Officer or IT Manager.

Disciplinary Consequences

All principles described in this policy must be strictly followed. A breach of code of conduct policy will invoke disciplinary and possibly legal action.