



Code of Conduct for Parami Energy Group of Companies

PARAMI ENERGY GROUP'S Code of Conduct defines how we should behave and conduct business in dealing with our colleagues, customers, and stakeholders. It sets forth our core values and responsibilities and general guidance about the Company's expectations.

At the beginning of every year, all employees will be asked to confirm in writing that they have reviewed the code of conduct, and understand and agree to adhere to the Code.

1. Introduction

- 1.1 This code of conduct applies to all employees of Parami Energy Group and its subsidiaries ("the Company"). It provides principles for conducting business and dealing with customers, colleagues and other stakeholders.
- 1.2 Employees should act with integrity and professionalism and be scrupulous in proper use of Company information, funds, equipment and facilities.
- 1.3 Employees should exercise fairness, proper courtesy, consideration and sensitivity in dealing with customers, colleagues and stakeholders.
- 1.4 Employees should avoid real or apparent conflict of interests.

2. Responsibilities

- 2.1 Employees are required to take ownership of their actions and be responsible for their conduct to protect the Company's reputation and that of other employees.
- 2.2 Employees should stay up to date on the Company's policies and standards that apply to their job and level of responsibility.
- 2.3 Employees should be a positive role model by acting with integrity, performing their duties with skill, honesty, and diligence, and encourage compliance by the individuals on their team.

3. Conflict of Interest

- 3.1 Employees must avoid any personal, financial or other interest which may be in conflict with their duties and responsibilities to the Company.
- 3.2 Any interest which may constitute a conflict of interest must be promptly disclosed to an appropriate Manager or Compliance Officer.
- 3.3 Employees must not accept any external appointment, such as working for another company, or conducting a business, without the written permission of the Chief Executive Officer (CEO).

4. Personnel

- 4.1 Respect and Dignity: Employees must treat everyone with respect and dignity.
- 4.1.1 No employee shall be discriminated against in employment or occupation on the grounds of sex, age, sexual orientation, religion, political opinion, nationality, ethnicity, disease or disability.
- 4.1.2 Employees, together with their managers, must work to achieve employee work/life balance.
- 4.1.3 Employees must be able to work in a workplace that is free from discrimination, physical, sexual, psychological, or verbal harassment or abuse, misuse of substances, and unsafe conditions.
- 4.2 Personal Safety and Wellbeing
- 4.2.1 Employees must follow the Company's safety and security guidelines, both in the office and while traveling.
- 4.2.2 Employees must follow *incident reporting procedures* in the case of a work-related injury, or if a safety or security concern is observed.
- 4.2.3 Employees must pay attention to projects that may pose physical safety or security concerns and promptly bring their concerns to their supervisor.
- 4.2.4 Employees must be aware of possible safety hazards, such as wet floors, building repair sites, and faulty electrical equipment, etc. and report adverse conditions that are on-going to the area supervisor and should be brought to the attention of General Manager, Khin Maung Oo.

5. Privacy and Confidentiality

- 5.1 Employees must not disclose any confidential or private information obtained through their employment to third parties, and should share confidential or private information only with the Company management and other employees on a need-to-know basis.
- 5.2 Employees must not use information obtained in the course of employment to obtain financial reward or other benefit.
- 5.3 Employees must not discuss confidential or private information in non-secure or public locations.
- 5.4 Employees must use *secure shredders* for disposing of documents with confidential or private information.
- 5.5 Employees must not transmit or share confidential or private information to third parties without consulting the line manager and Document Control Department.

6. Media and Public Relations

- 6.1 The Company's relationships with the media are conducted exclusively by the Chief Executive Officer (CEO) or as delegated by the CEO.
- 6.2 Employees must not comment on any aspect of the Company or publicly represent their own opinion as the Company's opinion to the media. If an employee receives an inquiry from the media, they should not accept interview requests unless designated by the CEO to do so. They must immediately report such requests to the Chief Executive Officer (CEO).
- 6.3 The Company is committed to open and honest communications, and to protecting its image. When designated by the CEO to represent the Company to the media, the public or other outside agency, employees must provide information that is truthful and consistent with the Company policies regarding quality, integrity and confidentiality.

7. Gifts and Entertainment

- 7.1 Employees may accept unsolicited gifts, other than money, that conform to the reasonable ethical practices of the marketplace such as flowers, fruit baskets and other modest presents and gifts of nominal value in the course of their duties.
- 7.2 Employees must under no circumstances give or accept gifts and entertainment that may have a market value greater than **K50,000 MMK** unless approval is obtained from the management.
- 7.3 Gifts should never be offered or accepted in circumstances where the outcome of a transaction may be influenced by the gift, or give rise to the perception that the transaction may be influenced by the gift.
- 7.4 Employees must not accept any type of compensation or money of any amount from entities with whom the Company does or may do business.
- 7.5 Invitations where travel and accommodation are involved, must be authorized by the Chief Executive Officer (CEO).

8. Physical Property and Electronic Security

- 8.1 Employees must use company funds, properties, facilities, and services only for authorized purposes.
- 8.2 Any intellectual property developed by an employee during or as a result of his or her employment by the Company is the sole property of the Company, unless governed by law or otherwise agreed in writing.
- 8.3 Employees are expected to use with care all the assets in their control, and assist with protecting the physical and network environments.
- 8.4 Employees should change their computer passwords regularly and should not share their computer and network passwords with others.
- 8.5 Employees must only use firm-approved data transfer and storage devices and must not share electronic storage devices containing confidential information with others.
- 8.6 Employees should use the Internet responsibly and access only Internet sites containing content appropriate for the workplace.
- 8.7 Employees must not download unauthorized programs and other inappropriate contents onto company-issued computers.



8.8 Employees should immediately report potential losses of laptops and data storage devices to Document Control Department so that, if possible, access to the device and network can be restricted.

9. Public and Community Involvement

9.1 The Company is committed to building a culture of Corporate Social Responsibility (CSR). Employees are encouraged to participate in CSR initiatives and find ways to volunteer for other non-CSR initiatives to support the community.

9.2 Employees must be aware of safety and security concerns that may arise while participating in volunteer events.

9.3 Employees dealing with youth, children or disabled persons involved in any of our CSR projects should familiarize themselves with our Child Protection Policies.

10. Ensuring Compliance

10.1 Employees must be aware of, and adhere to, company policies.

10.2 Those who violate the code or policies and procedures will be subject to disciplinary action, up to and including dismissal from the Company.

10.3 If an employee should know of, or become aware of, any breach of this Code of Conduct by another employee, they are under an obligation to notify the Compliance Officer.

10.4 A complaint or disclosure about an alleged breach of the code should be in writing and contain details about the date, time and nature of the alleged breach and include any available supporting material.

10.5 The allegation should be made directly to the Compliance Officer.

10.6 Employees may at any time discuss a matter, or seek advice on how to proceed with the matter with the Compliance Officer, the HR manager, the group of selected counsellors, or Chief Executive Officer (CEO).

11. Conclusion

11.1 Employees may seek clarification from their manager or the Company HR for general assistance, questions, or advice about any aspect of the Company's Code of Conduct.

11.2 Employees may contact the Human Resource Department for human resource-related concerns involving individual behavior or work environment, harassment, and discrimination.

Approved By:

Revised by:
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January 2018

Pyi Wa Tun
CEO and Chairman
Parami Energy Group of Companies