

A large, dark blue arrow pointing to the right, which serves as a background for the title text. The arrow has a white outline and is set against a white background with faint grey arrow shapes in the corners.

Code of Conduct

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Foreword

This document is the very first version of the GGI's comprehensive Code of Conduct, which includes and standardises all existing policies and instructions issued over the years.

As first version, this document is bound to contain the occasional mistakes, errors, typos and inconsistencies. There might be cases where the Myanmar version is slightly different from the English version and cases where one instruction seems to be contradicting what written elsewhere. There might also be cases where following the Code of Conduct to the letter makes running the business very convoluted or difficult or impractical. And of course there are areas of work that are not yet covered.

Over the course of the next few months, we will work to correct all of these, and we plan to release improved versions of the Code of Conduct on a regular basis. Every time a new version of the Code of Conduct is released, employees will be notified.

You can help in this process by reporting any issue you encounter to the Organisation Development Department. We appreciate your help.

To report:

- Typos, errors, mistakes
- Inconsistencies in the translation
- Incongruences between instructions
- Any other issue

and to offer any suggestions on topics that should be included, please contact:

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I. INTRODUCTION

This Code of Conduct applies to all employees and directors of GGI.

The first part includes policies and sets out standards that should guide our behavior and our relationships with our stakeholders including our customers, suppliers, partners, and government agencies.

The second part is aimed at providing instructions on how to implement the policies and how to act when the policies might be conflicting with the situation an employee or director finds himself/ herself in.

However, these instructions may not provide answers to every question we may have and are not a substitute for our individual responsibility to exercise good judgment and common sense. In cases of doubt about the correct behavior, employees should seek advice from the Code of Conduct Compliance Committee.

The Code of Conduct is integral part of the Employee Handbook, and together with it defines the expected behaviors of GGI employees.

Every employee is responsible to read and understand the guidelines and act according to it. Employees need to be aware that the Company does not tolerate violations of the Code of Conduct.

2. DEFINITIONS AND ABBREVIATIONS

Abbreviations	Explanation
Bribe	Bribery is the action of giving money, property, gift, service fee, entertainment and other benefit to somebody in exchange for a benefit that otherwise would not occur or to influence the action or decision of a person in an official or public capacity.
BOD	Board of Directors
CCD	Corporate Communications Department
Code of Conduct Compliance Committee	Independent Committee within the Board of Directors, responsible for monitoring compliance with the Code of Conduct and for investigating violations
Conflict of Interests	A situation in which a person related to the Company, such as employees, contractors, consultants and so on, is involved in external interests, which could possibly be not aligned with the Company's interests. Example would include appointing a friend or family member as supplier, when more qualified or more convenient suppliers are available, thereby causing a loss to the company.
Corruption	The act of offering or accepting bribes, or encouraging others to offer or accept bribes in order to gain unfair advantages.
CPC	Contract and Purchase Committee
CSR	Corporate Social Responsibility: programs to create a value for the stakeholders and positively influence lives of Myanmar people

Favouritism, Nepotism and Clientelism	Involve favouring someone related, such as a friend, family member or member of an association. Examples would include hiring or promoting a family member or staff member to a role they are not qualified for, regardless of merit. Another example would be buying good/services from a friend at non-market price.
GRI G4	Global Reporting Initiative: reporting standard, G4 are specific for sustainability reports.
OHSAS	Occupational Health and Safety Assessment Series
SCL	Service Contract Labour
SCW	Service Contract Worker
GGI	Grand Guardian Insurance Public Co.,Ltd.
Tender	An offer made in writing by one party to another to execute certain work, supply certain commodities, etc., at a given cost, bid.
United Nations Global Compact	The world's largest corporate sustainability initiative A call to companies to align strategies and operations with universal principles on human rights, labour, environment and anti-corruption, and take actions that advance societal goals.



Policies

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3. POLICIES

3.1. Organisational Conduct

3.1.1. Human Rights and Labour Rights Policy

Introduction

GGI is committed to being a good corporate citizen and contributing to the society of Myanmar within which we operate. We fully support the United Nations' Universal Declaration of Human Rights, to which every human being is entitled. As a company, we utilise the 30 articles from within the Universal Declaration of Human Rights as a common standard of achievement across all facets of our work. We acknowledge that the common understanding and compliance to these rights and freedoms are of the greatest importance.

We also understand and give full support to the principles of the International Labour Organisation's (ILO) Core Conventions and Principles. These cover the areas of freedom of association and common bargaining, the elimination of all forms of forced or compulsory labour, the effective abolition of child labour and the elimination of discrimination in respect of employment and occupation.

Purpose

We strive to achieve an international standard on labour policies and will continue to develop tools to measure the outcomes of our policies and practices for greater advancement in this area. This leads us to adopt and operate a human resource strategy that goes beyond the national regulations.

Key Policy Areas

- a. All our policies and practices comply with the fundamental principles described in the Universal Declaration of Human Rights. This includes equal chance, right to life, liberty, security of person, as well as the freedom of thought, consciousness, religion, opinion and expression.
- b. We are committed to address human rights risk, discover incidents of human rights abuse within the Company and act upon human rights related issues.
- c. We are an equal opportunity employer and have a policy of non-discrimination across all facets of employment from the hiring phase to on-going employment right through to termination or retirement. GGI operates in a fair manner and does not consider race, religion, gender, disability, parental status or age in any matter related

to employment. We also make sure that men and women have the same chances of hiring, of career progression, and are paid an equal salary for an equal job.

- d. We do not employ child labour and we strictly condemn forced labour.
- e. We respect our employees' rights to the freedom of association and collective bargaining. We do not forbid the creation and the commitment to any trade union, and recognize the right to collective bargaining as long as it is done in accordance with the law.
- f. We operate in full compliance with applicable work hours, overtime and benefits prescribed by laws in Myanmar. We comply with minimum wage laws in Myanmar. In addition, we provide extra allowances for employees based in certain locations of operations.
- g. We are committed to providing a healthy and safe working environment for our employees. Our employees attend health and safety trainings and awareness seminars on a regular basis. We provide Personal Protective Equipment (PPE) to employees to ensure their safety during operations. Rules and regulations specific to different operations and projects by GGI are clearly laid out in the workplace in order to effectively communicate our safety measures and precautions to all employees.
- h. We prioritise equitable access to healthcare for all our employees. We employ Doctors (or) Medical Officers to work on remote sites to ensure that medical attention is received promptly. Depending on the requirements of the operations, we make sure our on-site clinics are fully equipped to suit the medical needs of our employees.
- i. We view talent as a key asset of GGI and we offer a comprehensive and competitive remuneration and welfare package for our employees.

- j. Further development of the workforce is our priority. GGI provides employees with on-going skills development and training opportunities, and conduct both internal and external training programmes. We invest in our employees as we understand that their development is the key to our country's success.

Compliance with the Policy

Our commitments are fully supported by our Board of Directors, with a detailed management system stating ongoing objectives and targets which provides the framework of delivery of this Policy. We expect our business partners, suppliers, contractors and stakeholders to respect the same principles.

3.1.2. Anti-Corruption and Anti-Bribery Policy

Introduction

The Company has always been rigorous in setting and enforcing anti-bribery and anti-corruption policies, both internally (in respect to the relationships between the companies and the employees) and externally (in respect to the relationships with suppliers, customers, partners, the different levels of Government and the community in general).

Bribery is the action of giving money, property, gift, service fee, entertainment and other benefit to somebody in exchange for a benefit that otherwise would not occur or to influence the action or decision of a person in an official or public capacity. Bribery contributes to Corruption, which is a form of dishonest or unethical conduct by a person in a position of authority, often to acquire personal benefit.

Favoritism, Nepotism and Clientelism involve favoring someone related, such as a friend, family member or member of an association. Examples would include hiring or promoting a family member or staff member to a role they are not qualified for, regardless of merit.

Purpose

The spirit with which we have embraced these policies is not only that of fairness and integrity, but also of a bigger awareness that certain business practices need to be eradicated in order for the Country to develop to its full potential; and that GGI, as a leading business, has a responsibility of setting the example from within the Myanmar business landscape.

Key Policy Areas

- a. GGI conducts its business in compliance with all applicable laws and regulations. GGI is firmly and unequivocally committed to prevent and fight episodes of bribery and corruption. Our company has a **zero tolerance** for any behaviour, by individuals or organizations that act on behalf of GGI or represent it (such as agents, representatives or intermediaries), that can be interpreted as either committing or allowing, directly or indirectly, bribery.
- b. No gifts (financial or otherwise, such as gadgets, hospitality, meals, invitations to events and so on) can be accepted by employees or directors when dealing on behalf of the GGI. If gifts are received, regardless of their value, they cannot be retained and must be dealt with according to the instructions provided in the *Instructions* part of this Code of Conduct.
- c. Accepting gifts, or failing to declare them, will result in disciplinary action, including dismissal and legal proceedings.
- d. We prohibit facilitation payments, which are payments made to expedite or secure the performance of a routine governmental action, by an official, political party or party official.

- e. We do not provide any contribution of cash or in-kind support to any political party in Myanmar or overseas aimed of obtaining any improper benefit or advantage or any favorable treatment.
- f. Any political and social contribution made must be approved by GGI's Code of Compliance Committee and must adhere to the following;
 - i. Comply with Myanmar laws and regulations
 - ii. Clearly identify recipient, organization, purpose, and reason for contribution
- g. Anonymous donations and donations to individuals instead of organizations are not allowed.
- h. Employees are obliged to disclose to their immediate superior and to the respective top manager any possible conflict of interests (such as relationships of kinship or partnership with existing or potential suppliers).
- i. Employees are strongly discouraged from behaviors that can be interpreted as clientelism, nepotism or favoritism. Any episode where individuals are hired, promoted or rewarded for reasons other than skills and merits are not acceptable.

Compliance with the Policy

Our commitments are fully supported by our Board of Directors, with a detailed management system stating on-going objectives and targets which provides the framework of delivery of this Policy. We expect our Employees (permanent or casual), business partners, suppliers, contractors and stakeholders to respect the same principles.

Employees and directors are also required to attend a mandatory internal anti-corruption anti-bribery training program. Suppliers, contractors and sub-contractors need to sign a statement of acceptance of this Policy or Code of Business Conduct for Suppliers before dealing with the GGI. These statements will be integral part of the contracts between the parties.

The books and records of the GGI and each company controlled shall contain full and accurate information about all expenditures and transactions incurred. This allows for proper financial audits and prevents improper payments being made.

GGI will monitor the effectiveness of this anti-corruption and anti-bribery Policy and will review and update when needed.

3.1.3. Conflict of Interests

Introduction

A Conflict of Interests is a situation in which a person related to the company, such as employees, contractors, consultants and so on, is involved in external interests, which could possibly be not aligned with the GGI's interests. Example would include appointing a friend or family member as supplier, when more qualified or more convenient suppliers are available, thereby causing a loss to the company.

Purpose

Conflict of interests arises when there is a conflict between the official responsibilities of an employee and any other interests that the employee may have which prevents the employee from acting in the best interest of the company.

Key Policy Areas

- a. Employees must declare any conflict of interests to their supervisors.
- b. It is not possible to comprehensively define circumstances that will lead to conflicts of interests. Employees are expected to consult their supervisors if they are unsure if they face any potential conflict of interests.

Compliance with the policy

Undeclared conflicts of interests can be investigated and punished with disciplinary measures, according to section 4.3 of the Code of Conduct.

3.1.4. Transparency

Introduction

We believe that open and transparent communication and feedback are essential elements of enhancing our relationship with our stakeholders, reducing risk, sustainable development and improving management of our operational impact on others. We endeavour to provide a transparent, relevant and fair report on our activities. We dedicate time and manpower to provide accurate assessments of our procedures and actions. We communicate on both the progress of our projects and on our CSR activities.

Purpose

The information that we provide improves the choices of customers, suppliers, employees, partners, investors, and citizens. Those choices improve our markets accountability and encourage us to reduce risks associated with our businesses.

Key Policy Areas

We practice the principle of transparency in our interactions with our stakeholders. We issue press releases for key announcements concerning GGI.

Compliance with the policy

Our commitments are fully supported by our Board of Directors, with a detailed management system stating ongoing objectives and targets which provides the framework of delivery of this Policy.

3.1.5. Workplace Health and Safety Policy

Introduction

Our philosophy is that the well-being of our company and clients is dependent on the health and safety of our workforce. Every precaution reasonable in all circumstances shall be taken for the protection of all workers. The welfare of the individual is our greatest concern.

We are committed to providing a healthy and safe working environment for our employees and any visitors to our work sites, in order to protect people and property/physical assets, in accordance with industry standards and in compliance with legislative requirements.

Purpose

We recognise that the responsibility for health and safety are shared. All employees will be equally responsible for minimizing accidents within our facilities and on our work sites, together with contractors, suppliers and customers.

Everybody in GGI is expected to participate actively in the implementation of sound Safety procedures.

Key Policy Areas

- a. All management activities will comply with company safety requirements such as identifying health and safety roles and structure within the organization, issuing safety rules and instructions, performing inspections, displaying proper signage, keeping records of incidents, as they relate to planning, operation and maintenance of facilities and equipment. All employees will perform their jobs properly in accordance with established procedures and safe work practices.

- b. We are committed to continuing improvement toward an accident-free workplace through effective administration, education and training. All supervisors and workers must be dedicated to the continuing objectives of eliminating the “near misses” which will greatly reduce the risk of injuries.
- c. Our employees attend health and safety trainings and awareness seminars on a regular basis.
- d. No job is to be regarded so urgent that time cannot be taken to do it in a safe manner.
- e. We provide Personal Protective Equipment (PPE) to employees to ensure their safety during operations.
- f. Rules and regulations specific to different operations and projects by GGI are clearly laid out in the workplace in order to effectively communicate our safety measures and precautions to all employees.

Compliance with the policy

Our commitments are fully supported by our Board of Directors, with a detailed management system stating ongoing objectives and targets which provides the framework of delivery of this Policy. We expect our business partners, suppliers, contractors and stakeholders to respect the same principles.

3.1.6. Land and Property Acquisition

Introduction

GGI respects people’s rights to land and resources and we are committed to recognizing and protecting those rights, particularly the rights of those located near our operations.

Our land resources will be managed, administered and used with the long-term objectives of livelihood improvement of Myanmar citizens and sustainable development of Myanmar.

Purpose

We are committed to be consistent with our objectives; the Company applies the following fundamental goals

- a. To ensure that a fair and transparent process for project-related land
- b. To promote sustainable land use management and protection of cultural heritage areas, environment, and natural resources for the interests of all people in the country;
- c. To promote people centered development, participatory decision making, responsible investment in land resources and accountable land use administration in order to support the equitable economic development of the country;
- d. to identify manage and avoid the negative impacts from land acquisition for our business activities;

Key Policy Areas

We are committed to the following when acquiring land for our businesses to avoid negatively affecting the communities located on or near the land:

- a. Conduct due diligence on the ownership of the land
- b. Identify environmental and social risks and impact to communities
- c. Engage with affected communities and stakeholders
- d. Obtain independent advice prior to land acquisition, and ensure that affected communities' rights are protected and respected

- e. Compensation for affected communities will be just and fair, with the objective of improving or restoring their standards of living or livelihoods
- f. If resettlement is required, we will publicly communicate the resettlement sites, the number of affected persons, and the mitigation measures to restore livelihood of displaced people
- g. Introduce a grievance mechanism to provide opportunities for affected communities to give feedback

Compliance with the policy

This Policy is in full compliance with the land acquisition law in Myanmar. Our commitments are fully supported by our Board of Directors, with a detailed management system stating ongoing objectives and targets which provides the framework of delivery of this Policy. We expect our business partners, suppliers, contractors and stakeholders to respect the same principles.

3.1.7. Intellectual Property

Introduction

Intellectual property protection is critical to fostering innovation. Without protection of ideas, businesses and individuals would not reap the full benefits of their inventions and would focus less on research and development. The investment in our infrastructure reinforces our continued commitment to adopting international business practices and respecting intellectual property rights.

Purpose

Our intellectual property policy is intended to protect assets that may be integral to the core services and overall long-term viability of our business as well as others' businesses.

Key Policy

We respect intellectual property rights and will not infringe or violate any company's intellectual property.

Compliance with the policy

Our commitments are fully supported by our Board of Directors, with a detailed management system stating ongoing objectives and targets which provides the framework of delivery of this Policy.

Example- In November 2015, we embarked on our digital transformation journey by investing in Microsoft solutions for higher efficiency, productivity and security. The investment in our technology infrastructure reinforces our continued commitment to adopting international business practices and respecting intellectual property rights. This partnership is a testament to GGI commitment to strong corporate governance and our respect for intellectual property rights.

3.2. Employee Conduct

3.2.1. Media Relations and Disclosure

Introduction

These guidelines cover our communications with the media and the public. They apply to all employees, in both formal and informal disclosure of company information to external parties.

Purpose

Effective communication with the media and the public allows us to raise the profile of GGI and provide accurate and consistent information to the public. Our commitments are to ensure the disclosed information in a timely, consistent, and appropriate manner.

Key Policy Areas

- a. All media queries and requests shall be referred to the Corporate Communications Department (CCD). *Media* refers to the main means of mass communications comprising television, radio, print and the internet.
- b. Only authorized representatives of GGI are allowed to speak to the media on behalf of the company.
- c. Employees who participate in social media should not claim to represent GGI or set up social media accounts for the Company.

Compliance with the policy

Our commitments are fully supported by our Board of Directors, with a detailed management system stating ongoing objectives and targets which provides the framework of delivery of this Policy.

3.2.2. Privacy and Confidentiality

Introduction

Employees are required to respect and safeguard confidential information about the Company Confidential information is information that is not publicly available.

Purpose

This policy is intended to regulate to what extent employees can handle and disclose information about GGI and its businesses.

Key Policy Areas

- a. Employees shall not divulge to any person or otherwise make use of any confidential information concerning the business, finance or operations of the Company or any such confidential information concerning any of its investors, contractors, suppliers and customers.
- b. The business affairs and the financial information of the Company, its affiliates and subsidiaries, shall not be discussed with any individuals outside of our organization, particularly, not to any direct competitors.
- c. In the event that an employee is approached to disclose any such information, the employee must immediately communicate this to his/her superior.
- d. We always make sure that we enter into a Non-Disclosure Agreement before starting collaborations with any third party in order to protect our confidential information.
- e. We comply with all laws, rules, regulations, and terms and conditions of respective agreements in regard to protecting information of business dealings or engagements with other parties.

- f. Employees should respect proper channels of communication for information, including confidential information, and should check with their supervisors if they are not sure.

In case of doubt, employees can seek guidance with the Code of Conduct Compliance Committee.

Compliance with the policy

Our commitments are fully supported by our Board of Directors, with a detailed management system stating ongoing objectives and targets which provides the framework of delivery of this Policy. We expect our business partners, suppliers, contractors and stakeholders to respect the same principles.

3.2.3. Whistleblowing

Introduction

Employees and stakeholders are encouraged to make good faith reports of suspected cases of bribery and corruption, or health and safety concerns, or any other breaches of the Code of Conduct within GGI.

Purpose

We are committed to conducting our business with accountability and we expect all staff to maintain high standards. The purpose of the policy is to eradicate unethical and unwanted behaviours by facilitating reports and by protecting the reporter from negative consequences (retaliation, etc.)

Key Policy Areas

- a. We encourage our employees who have knowledge of
 - i. violations or intent of violations of an applicable law by the employee,
 - ii. A hazard or potential danger to the health and safety of an employee or the public, including any injury, illness or fraud,
 - iii. Breaches or non-compliances of the Code of Conduct within GGI,

to report to the Code of Conduct Compliance Committee without fear of victimization, demotion, penalty or dismissal.
- b. We ensure full confidentiality of the whistleblower and conduct independent investigation of any reported incidents. We should maintain two-way communication with the whistleblower for follow up on the investigation.
- c. Employees who would like to report any incidents should first contact their immediate supervisor if appropriate. In the event of any conflict of interests, employees can reach out to the Code of Conduct Compliance Committee.

Compliance with the policy

Our commitments are fully supported by our Board of Directors, with a detailed management system stating ongoing objectives and targets which provides the framework of delivery of this Policy. We expect our business partners, suppliers, contractors and stakeholders to respect the same principles.

3.3. Community and Environment

3.3.1. Sustainability Policy

Introduction

Sustainability has always been at the core of the GGI's strategy. Our activities are guided by our corporate vision "To build an ideal environment for the growth and protection of wealth and lives."

Purpose

We are committed to being a good Corporate Citizen, contributing to the development of Myanmar. Our aim is to create value for stakeholders, while conducting sustainable business practices, caring for our community, and protecting our environment. Through our wide ranging corporate social responsibility (CSR) engagement, we aim to become a catalyst of positive change that will enhance the lives of Myanmar citizens.

Our objective is to achieve sustainable outcomes through private public ventures and shared value initiatives. GGI is invested in the communities we work beside, our consumers are our key stakeholders and we strive to support the communities we serve.

Key Policy Area

GGI has been a member of the United Nations Global Compact since 8th November 2016, a United Nations initiative to encourage businesses worldwide to adopt sustainable and socially responsible policies in the areas of human rights, labour, the environment and anti-corruption. Our approach to sustainability is based on four pillars and United Nation Sustainable Development Goals (GGI):

People: Our people are our most important resource and we believe that the development of human capital is key to sustainability. We are committed to providing our employees with fair and dignified employment that maximises each employee's potential in the long term.

Environment: At GGI we recognise the need to respect the environment. We are fully committed to tackling the challenges brought about by climate change. We are actively working towards reducing our carbon footprint across all our operations and continue to develop tools to measure the outcomes of our progress in the direction of being more carbon neutral and environmentally sustainable.

Governance: We believe strong corporate governance is fundamental to maintaining a successful business.

Communities: We believe that community development is a key aspect of sustainability. We are committed to becoming a catalyst promoting positive change that will enable communities to live better, safer and happier. Our aim is to go beyond contribute and be actively involved in projects that have positive impact for the community and the society.

Sustainable Development Goals: GGI commitment to work towards achieving the 17 United Nations Sustainable Development Goals. The Company is committed to reaching all SDGs in 2030.

For each major project, at least 1% of our revenue is dedicated to CSR activities through the constitution of a CSR fund reserve. The More information about our CSR programme can be found in our annual Communication on Progress report submitted to the United Nations Global Compact. The Communication on Progress (COP) report will discuss our progress towards achieving the GGI and in addition highlight the ways in which we have begun to shift our company strategy away from the traditional methods of Corporate Social Responsibility (CSR) strategies to focus on more sustainable practices.

Compliance with the Policy

Our commitments are fully supported by our Board of Directors, with a detailed management system stating ongoing objectives and targets which provides the framework of delivery of this Policy. We expect our business partners, suppliers, contractors and stakeholders to respect the same principles.

3.3.2. Environmental

Introduction

At GGI, we recognize the need to respect the environment and be cautious when conducting projects that may adversely harm the eco-system and bio-diversity of Myanmar. The Company is actively working towards reducing our carbon footprint across all our operations and continues to develop tools to measure the outcomes of our progress in the direction of being more carbon neutral and environmentally sustainable.

Purpose

We believe that businesses are fully responsible for achieving good environmental practices and operating in a sustainable manner. We are therefore committed to reducing our environmental impact and continually improving our environmental performance as an integral and fundamental part of our business strategy and operating methods.

It is our priority to encourage our customers, suppliers and all business associates to do the same. This not only makes sound commercial sense for all but also delivers our duty of care towards future generations.

We want our co-workers to be ambassadors of the company's environmental commitment. Beyond developing the sustainable properties, our environmental commitments are communicated to all our stakeholders, who are required to share the same set of practices.

Key Policy Areas

Our policy is to:

- a. Articulate around three main pillars:
 - Design, according to the principles of sustainability,
 - Act, in order to reduce our environmental impact
 - Champion, by raising awareness amongst our internal and external stakeholders.
- b. Wholly support and comply with or exceed the requirements of current environmental legislation and codes of practice.
- c. Minimise our waste and then reuse or recycle as much as possible.
- d. Minimise energy, water and raw material usages in our daily operation in order to conserve supplies, and minimize our consumption of natural resources to reduce any impact from our operations on the environment and local community.
- e. Apply the principles of continuous improvement in respect of air, odour, noise and light pollution from our premises and reduce any impacts from our operations on the environment and local community.
- f. Where possible, purchase products and services that do the least damage to the environment and encourage others to do the same.
- g. Assess the environmental impact of any new processes or products we intend to introduce in advance.
- h. Work with business partners, interest groups and other government agencies in a concerted effort to operate in an environmentally responsible manner.

Compliance with the policy

This policy is fully supported by Board of Directors with an internal commitment to adopt an Environmental Management System aligned with the ISO 14001 certification.

For all our major developments, we perform environmental impact assessments to identify environmental threats or opportunities relating the site and its surroundings.

More information about our efforts towards environmental sustainability can be found in our annual Communication on Progress report submitted to the United Nations Global Compact.

3.3.3. Stakeholders' Grievance and Dispute Resolution Policy

Introduction

The Company's Stakeholders' Grievance and Dispute Resolution Policy is a structured process that can be used by individuals, employees (including temporary and contract employees), communities and civil society organisations that are negatively affected by our business activities and operations.

We believe that open and transparent communication and feedback are essential elements of enhancing our relationship with our stakeholders, reducing risk, and improving management of our operational impact on others.

Purpose

We are committed to working together with our stakeholders to resolve their concerns in a prompt, equitable and satisfactory manner.

Key Policy Areas

- a. People have the right to have their grievances receive careful consideration through established processes that are timely and based on fairness and respect.
- b. The best resolution is one that is reached cooperatively and informally where possible prior to a formal complaint being lodged in writing.
- c. Any aggrieved party can submit a grievance by letter or email to the Code of Conduct Compliance Committee which is responsible for hearing, processing and resolving grievances.

- d. Any grievance received will be considered in a timely and confidential manner, and documented together with the steps towards resolution.
- e. The Code of Conduct Compliance Committee will respond to all grievances received, taking into account the relevant circumstances and the needs of all affected parties.
- f. If the outcome of the dispute resolution proposed by Code of Conduct Compliance Committee is not acceptable to the complainant, the complainant can submit an appeal letter to the Code of Conduct Compliance Committee.
- g. The Code of Conduct Compliance Committee will form an Appeals Committee jointly with (a) the complainant, and (b) an independent, respected member of the community, to reach resolution acceptable to all parties.
- h. We believe that our stakeholders, including our employees, should be able to raise any grievance without fear victimization, demotion, penalty or dismissal. We will endeavour to maintain full confidentiality of the complainant and investigation process. In circumstances where full confidentiality cannot be maintained if the grievance is to be fully investigated, we will first inform the complainant.

Compliance with the Policy

Our commitments are fully supported by our Board of Directors, with a detailed management system stating ongoing objectives and targets which provides the framework of delivery of this Policy.

3.4. Legal and Compliance

We are dedicated to conducting our businesses consistently with the highest standards of business ethics and in accordance with applicable laws, rules and regulations in Myanmar at all times.

We expect our suppliers and partners, including all their employees, agents and subcontractors, to embrace the GGI's commitment to integrity and responsibility in upholding the law at all times while conducting business with, for or on behalf of the company.