



INTRODUCTION

IGE Group is committed to making positive economic, social and environmental contributions to society, consistent with the principles of honesty, integrity, fairness and respect.

The Board has adopted this Code to provide a set of guiding principles which are to be observed by all IGE personnel, and against which we hold ourselves accountable. IGE personnel are expected at all times to act consistently with the principles set out in this Code.

OUR PRINCIPLES

All directors and employees of IGE Group companies (**IGE personnel**) are expected at all times to act consistently with the following principles:

1. Act with honesty, integrity and fairness, and be accountable for our decisions.
2. Act in compliance with the law and IGE' policies and procedures, and do not make or receive improper payments.
3. Seek to make positive and sustainable economic, social and environmental contributions to the communities in which we operate.
4. Respect and maintain privacy and confidentiality of information and accuracy of business records.
5. Identify and manage conflicts of interest.
6. Treat IGE's image & other employees with respect, value diversity and provide a safe working environment.
7. Respect and do not misuse IGE's resources and information systems.
8. Engage in business relationships professionally and honestly.

1. Act with honesty, integrity and fairness, and be accountable for our decisions

Honesty, integrity and fairness are integral to the way in which our businesses operate and should guide all our decisions. These values are integral to maintaining the trust of our suppliers, customers, colleagues, community and shareholders.

IGE shareholders, suppliers, customers and the communities in which we operate expect IGE personnel to act in a professional manner by:

- performing our duties with care and diligence, and seeking to achieve excellence in our roles;
- not participating in any illegal or unethical activity;
- being accountable for our decisions and actions; and
- dealing fairly with all of our customers, suppliers, business partners and competitors.

2. Act in compliance with the law and IGE's policies and procedures, and do not make or receive improper payments

IGE personnel must be familiar and comply with all laws and regulations, and the policies and procedures of the Company that are applicable to their roles. A breach of the law can have serious consequences both for IGE and for the individuals involved. If there is anything inconsistent between the laws and regulations applying where you work and IGE's policies and procedures, then you should meet whichever sets the higher standard of behavior.

Anti-bribery

IGE personnel must not engage in activity that constitutes bribery, facilitation payments, secret commissions or money laundering. Such activity is contrary to principles of integrity and fairness, and is harmful to IGE's reputation & image amongst customers, suppliers, shareholders and the community.

IGE personnel are required to comply with and uphold all laws against bribery and related conduct in all the jurisdictions where IGE operates. IGE personnel must observe the following at all times:

- do not offer or accept bribes, kick-backs and similar payments – IGE personnel must never offer or accept any irregular payment to win business or to influence a business decision in IGE's favor (such as bribes, 'kick-backs' and similar payments in any form). This restriction also applies to consultants and contractors.
- do not accept gifts, entertainment or hospitality in breach of our policies - IGE recognizes that accepting or offering gifts, entertainment or hospitality of moderate value is in accordance with usual business practice.
- do not offer or accept gifts, entertainment or hospitality in circumstances which could be considered to give rise to undue influence - Gifts, entertainment and hospitality must be recorded in accordance with IGE's Anti-bribery Policy.
- do not improperly influence an official - All dealings with politicians and government officers which relate to IGE and its business activities must be conducted at arm's length and with the utmost professionalism, to avoid any perception of attempts to gain advantage.
- recording of business dealings - All business dealings must be accurately documented to reflect the true & genuine nature of the transaction.
- expect the same from third parties as we expect of ourselves - IGE personnel must take all practical steps to ensure that third parties (agents, contractors, intermediaries or business partners) dealing with or on behalf of IGE do not engage in conduct that would contravene the Anti-bribery Policy, this Code or any applicable laws in Myanmar.
- political donations - Any political donations must be authorized by the Board and will be disclosed as required by law and recorded in our accounts. Political donations may not be made at business unit or divisional level.
- IGE may choose to make donations to political parties because IGE believes this would enable any such parties to perform their functions better and to improve the political process.
- *Further information: **Anti-bribery Policy** can be found on the IGE website.*

Competition Law

IGE is committed to compliance with the Competition Law in Myanmar, and equivalent legislation in other jurisdictions in which IGE operates.

The Competition Law has two main purposes:

- to promote and maintain fair and open competition in the marketplace; and
- to protect consumers by requiring accurate information in the marketplace and fairness in business dealings where there is an inequality in bargaining power.

We respect consumers by providing accurate information, acting in a fair manner in our business dealings and trading independently of our competitors. All IGE personnel have an obligation to actively promote compliance with this Law (and equivalent legislation in other jurisdictions, where applicable). Employees in management or marketing roles, and those who have responsibility for deciding how to deal with suppliers, customers or competitors, are required to undertake regular training. If you are unsure about any matter in relation to Myanmar Competition Law, you should raise the matter with your Head of Department or Executive Officers.

3. Seek to make positive and sustainable economic, social and environmental contributions to the communities in which we operate

IGE believes that companies have community responsibilities above and beyond the contribution made by their employment and wealth creation activities. IGE is committed to seeking to make positive and sustainable economic, social and environmental contributions in the communities in which we operate and to ensuring that good corporate behavior is integrated into all aspects of operations. IGE's personnel are expected to assist in meeting these commitments.

4. Respect and maintain privacy and confidentiality of information and accuracy of business records

Business information

IGE personnel may come across confidential information concerning the Group Companies, such as technical, strategic or financial information, commercial arrangements or intellectual property.

IGE personnel must:

- use confidential information solely for the purposes of their duties;
- preserve the confidentiality of IGE' confidential information and ensure that it is not disclosed, except on a "need-to-know" basis to other IGE personnel authorized recipients, or as required by law;
- maintain the confidentiality of information they come across in dealings with customers, suppliers and third parties; and
- not use or modify any confidential information for their own or a third party's interest or benefit.
- *These confidentiality obligations continue even after you have left IGE Group.*

Privacy obligations

IGE is committed to complying with government legislation governing privacy of personal information obtained by its businesses, and protecting and safeguarding the privacy of people who deal with IGE.

All personal information that is collected must be used, stored, handled and updated in line with the privacy policy of the relevant division, business unit or Corporate Office. If you have any queries in relation to your privacy obligations, contact one of the Executive Officers for your division, business unit or the Corporate Office.

Business records

We must ensure that we accurately and rigorously maintain all records relating to business and its operations.

The **Document Control Policy** requires the safe and efficient storage and handling of documents to ensure compliance with legal obligations as well as to preserve documents of importance for business and/or historical reasons. The **Document Control Policy** also sets out principles for the periodic, orderly and secure destruction of obsolete documents.

5. Identify and manage conflicts of interest (COI)

Our personal interests should not conflict with our duties and obligations to IGE Group. A conflict of interest may arise if you have a direct or indirect (through a family member, friend or associate) financial interest in a business that has commercial arrangements.

To manage conflicts of interest properly, IGE personnel must:

- disclose any actual or perceived conflicts of interest to the *executive officers*.
- in the case of divisions/business units, this is the divisional/business unit Corporate Secretary, Compliance Officer or Managing Director/Chief Executive Officer (**Divisional Officer**).
- in the case of the Corporate Office, this is the IGE Corporate Secretary, the Group Compliance Officer or the Group Managing Director (**Corporate Officer**).
- seek approval from a relevant Executive Officer, as the case may be, before accepting any outside business interests including non-IGE work, business ventures, directorships, partnerships or other interests which have the potential to create a conflict of interest.
- keep an arm's length relationship when dealing with government officials, customers, partners and suppliers.

6. Treat IGE's image & other employees with respect, value diversity and provide a safe working environment

IGE's image

IGE does not tolerate its image and reputation being misused or insulted by not only employees but also the related parties in business dealings. Hence, you must ensure:

- to maintain your own dignity and image go in line with IGE Management's expectations by sharing IGE's vision, mission and objectives;
- to avoid any situation and circumstances that may jeopardize your own image as a IGE employee and IGE's image itself;
- to avoid visiting adult venues/ or other inappropriate places and behaving inappropriately while wearing IGE batch or the uniform;

Diversity

IGE does not tolerate unlawful discrimination, bullying, harassment or other unacceptable conduct. We can create a diverse and supportive environment by:

- supporting each other and working collaboratively as a Team;

- ensuring that we do not unlawfully discriminate against, bully or harass our colleagues or anyone else in the workplace;
- making employment decisions based only on merit, qualification and performance;

Safe working environment

IGE will provide a safe working environment and comply fully with all local and national laws and regulations regarding safety in the workplace. IGE personnel will:

- report health and safety issues - take responsibility for safety by reporting any health or safety issues immediately;
- abide by health and safety policy - abide by Divisional health and safety policy and follow safety instructions at all times;
- comply with alcohol consumption prohibitions - comply with the alcohol prohibitions that applies in their division/business unit. Where permitted at IGE's site or function, alcohol must be served and consumed in a responsible manner; and
- no smoking - not smoke during work hours outside of permitted breaks at any premises, sponsored function or activity.

IGE has a zero tolerance policy towards illegal drug possession and use, and the misuse of prescription drugs, at work whether on IGE's premises, when conducting business on behalf of IGE or at sponsored functions or activities.

7. Respect and do not misuse company's resources and information systems

IGE personnel must use company's property, funds, facilities and services for authorized purposes and not for personal benefit, or the benefit of unauthorized third parties. IGE regards the unauthorized removal of equipment, supplies and other resources belonging to the company as theft. Any transactions or disposals of company's property or resources must be approved by senior management and accurately recorded in financial records.

Information Systems

Email, the internet, facsimile, telephones and other company's information systems must be used appropriately so as to maintain and not put at risk the integrity of the information

systems. Divisions, business units and the Corporate Office have policies in place to manage risks associated with information technology systems and their use. IGE personnel must comply with the requirements of those policies at all times.

Bring Your Own Devices

IGE personnel linking personal devices to the IGE's information systems must ensure they first obtain appropriate authorization and use such devices in accordance with all relevant Corporate Office or divisional/business units' policies.

Social Media/Networking

IGE personnel must ensure that they use any social media and networking sites in accordance with the requirements of the Code of Conduct and relevant IT and media policies.

8. Engage in business relationships professionally and honestly

From time to time IGE engages agents, contractors, consultants and other intermediaries (**External Personnel**); it is our policy to deal fairly and honestly with all External Personnel and ensure that all relationships with External Personnel are based on price, quality, service and reputation. Improper conduct by External Personnel may expose IGE to legal liability or reputational damage. IGE is committed to the safe and ethical manufacture and supply of goods and services, and reserves the right not to do business with External Personnel who do not share and demonstrate this commitment.

