



Objective

Serge Pun & Associates (Myanmar) Ltd (“SPA”) and its subsidiaries (“the Group”) have implemented its policy on ‘AntiBribery’ in support of a Group wide Corporate Governance framework in preventing bribery and corruption.

Group’s ‘Code of Conduct’ and ‘Conflicts of Interest’ Policies commits us never to engage in bribery, any form of unethical inducement or payment including facilitation payments and ‘kickbacks’.

Definition

For the purposes of this policy, bribery occurs when one person offers, pays, seeks or accepts a payment, gift, favour, or a financial or other advantage from another to influence a business outcome improperly, or to induce or reward improper conduct.

Bribery and corruption, whether involving government officials, political parties, or commercial entities, including joint ventures, can be direct or indirect through third parties such as agents, brokers and joint venture partners including facilitation of payments.

Our Commitment

The Group is committed to put procedures in place to prevent bribery by any individual or organisation that performs services for or on behalf of the Group. Consequently, this policy applies to every employee, contractor, director and officer in every wholly-owned Group company and in every joint venture company with whom the Group has a relationship.

Contractors, consultants or suppliers who are our agents or who are working on our behalf or in our name, through outsourcing of services, processes or any business activity, will be required to act consistently with this policy when acting on our behalf. Independent contractors, consultants or suppliers will be made aware of this policy as it applies to our people in their dealings with them. Joint venture companies not under the Group control and joint venture partners are encouraged by the Group to adopt a similar policy, and adequate procedures, to prevent bribery.

Policy

The Group does not tolerate any form of bribery or corruption.

You must not offer, pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment or to gain any business advantage. You must follow the anti-bribery and corruption laws to which you and the Group are subject, remembering that Myanmar anti-bribery and corruption laws apply wherever you are operating.

You are liable to disciplinary action, dismissal, legal proceedings and possibly imprisonment if you are involved in bribery and corruption.

You must ensure people who work for and with you understand bribery and corruption is unacceptable.

You must comply with the Group procedures for the prevention of bribery and corruption.

This policy will be disseminated and published to all employees, contractors, suppliers and business partners together with all updates and clarification.