

Max Myanmar Group of Companies

ANTI - CORRUPTION

Policy, Procedures & Practices



MAX ENERGY



MAX WELL TRADING



MAX CEMENT



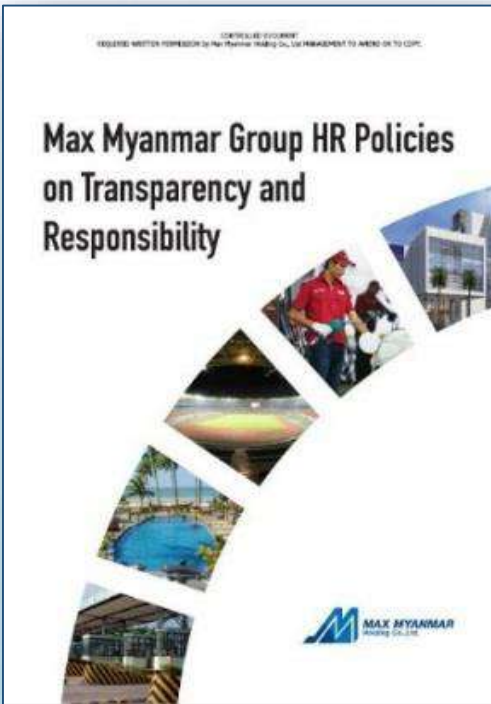
Max Myanmar
CONSTRUCTION



SHWE YUNG PVA AGRO Co.,Ltd.



Anti-Corruption Efforts at Max Myanmar Group



- ❖ Published **Anti-Corruption Policy** on 5th May 2014
- ❖ Supported by **Whistle Blowing Policy & Human Right Policy**
- ❖ Restructured to become a Group of Companies with “**Good Corporate Governance**” : *Transparency, Integrity, Responsibility*

<http://www.maxmyanmargroup.com/en/content/corporate-governance>

<http://www.maxmyanmargroup.com/en/content/anti-corruption-policy-0>

- **To prevent the corruption**
 - **To combat the corruption**
 - **To promote the good governance**

Wage
Increase

Transparency

Accountability

Compliance

Good
Governance

Integrity

Responsibility



Policy, Procedures, Practices, & Proof

➤ Policy

- Express statement of Zero-Tolerance
- Gift, Sponsorship, Entertainment, Facilitation guidelines (*UNCAC Article 17*)
- Donation: Political Donation (*UNCAC Article 16*)
- Extended to Cover Third-Party

➤ Procedures

- Risk Assessment
- Education / Awareness
- Establish a merit system (*UNCAC Article 7*)
- Training: :Orientation (*UNCAC Article 60*)
:Scheduled training with Other CR Topics (Human Rights / OHS)

➤ Practices

- Wages increase and added fringe benefits
- Empowerment / Decentralization
- Transparent Public Procurement: Tender Committee – (*UNCAC Article 9*)
- Whistle Blowing (*UNCAC Article 32*) / Social Media (Facebook)/ Suggestion Box (*UNCAC Article 13*)
- Grievance Handling
- Sustainability Officer / Compliance Officer
- Monthly / Quarterly Meeting Report
- Refreshment Course for Management



➤ Audit

- Internal Audit : **Internal Audit Committee**
- External Audit : **Deloitte** (International Audit Firm)

- ✓ Strong financial management (*UNCAC Article 11*)
- ✓ Clear conflict of interest
- ✓ Transparency (*UNCAC Article 10*)

- ❑ Policy, procedures and practices are in-line with **UNCAC principles**.
- ❑ Assumed **MCRB** as independent, third party monitoring institution
- ❑ **Corporate Responsibility (CR)** Assessment by **BSR** in 2014 and 2015.



Policy, Procedures, Practices, & Proof



MAX ENERGY

UN Global Compact

Transparent procurement & sub-contracting

ISO



Max Myanmar

HIGHWAY & TOLL COLLECTION

UN Global Compact

Tender Committee

Sub-contractor & Supplier Contract

Promotion & Transfer Policy -Procedures

ISO



HOTEL MAX

HOTELS & RESORTS

UN Global Compact

Spinning Off Key assets



Policy, Procedures, Practices, & Proof

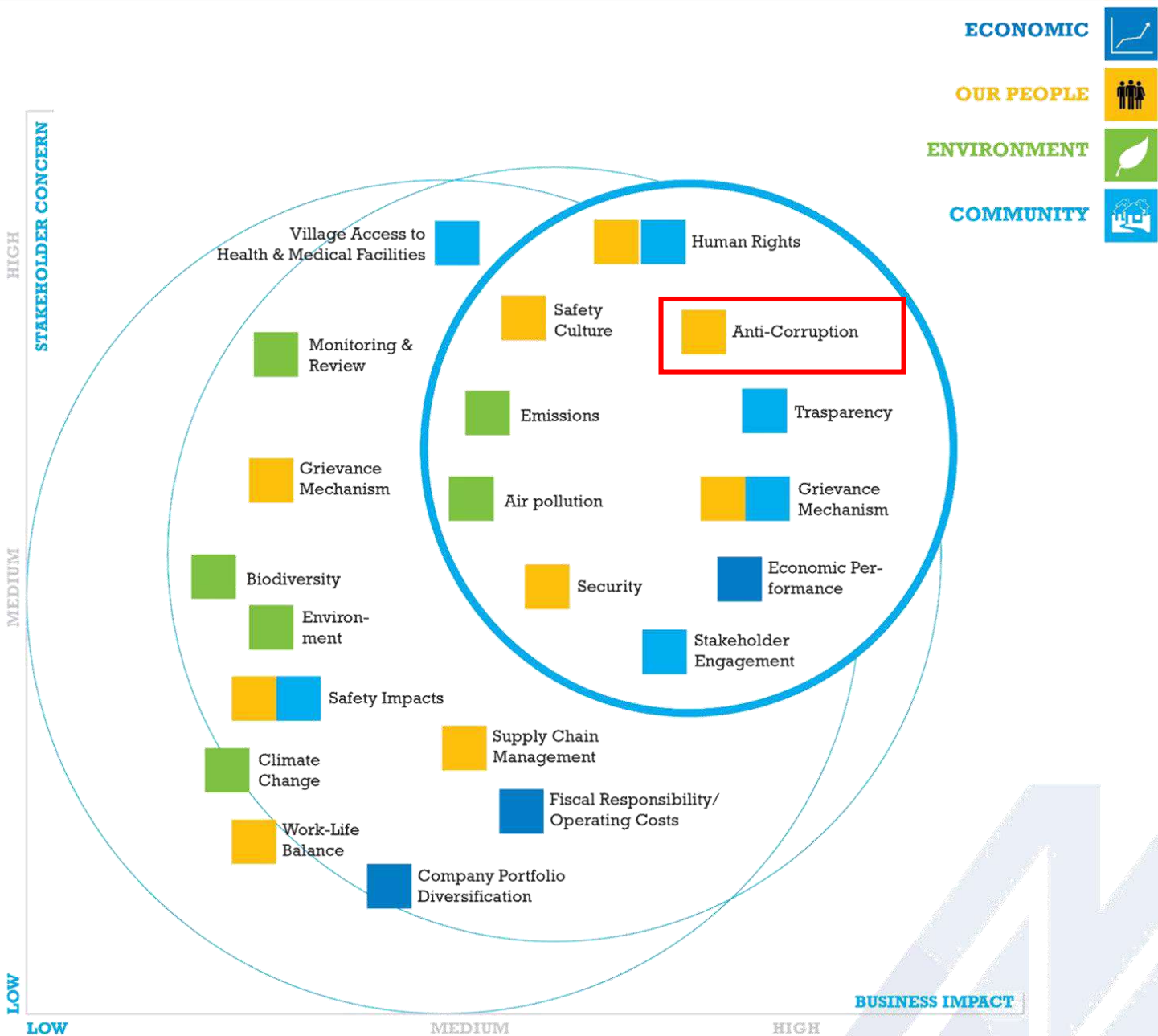


UN Global Compact
Risk Assessment & Follow-up action
Tender Committee
Third Party / Subcontractor / Supplier Engagement
Promotion & Transfer
Post Completion Survey



UN Global Compact

Sustainability Matrix - Max Myanmar





Anti-Corruption Efforts at Max Myanmar Group



❖ **BSR:** Corporate Responsibility (CR) Assessment by **BSR** in 2014 and 2015



PWINT THIT SA PROJECT
Transparency in Myanmar Enterprises

Myanmar Centre for
Responsible Business

❖ **MCRB:** Ranked 3rd in 2014, 2nd in 2015 and 3rd in 2016 TiME report by **MCRB**



❖ **Global Witness**



❖ **c.f.i.:** Received **Best ESG Transparency 2015** award by “**c.f.i.**”



Reported Incidents



Case 1 : Personal use of company's cash while he is on duty for Accountant and Cashier

- Action Taken*
1. Checked and reviewed from Management Team
 2. Demotion
 3. Assigned to repay cash monthly

Case 2 : Personal use of company's payment to supplier while he is working as Supervisor

- Action Taken*
1. Checked and reviewed from HOD and decided him to repay during one month
 2. While he was assigned in rural area, he breached the social order again and so company asked him to resign himself and put him on the black list.



Reported Incidents



Max Myanmar
HIGHWAY CO., LTD

Case 1 : **Misuse of cash from toll collection / Bribery from co-worker**

Action Taken : Dismissed

Case 2 : **Misuse of cash from toll collection / Bribery from external company at
Thanlwin division**

Action Taken : Dismissed

Case 3 : **Misuse of cash and incorrect data entry ledgers**

Action Taken : Dismissed

ANTI - CORRUPTION

Policy, Procedures & Practices



Thank You