



MAX ENERGY



Communication On
Progress

Communication On Progress

2025~2026



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Company Overview

Max Energy was founded in June 2010 with twelve filling stations following approval from Myanmar's National Privatization Commission for the private distribution of diesel and petroleum products in Myanmar. Max Energy is also one of the strategic business units of the Max Myanmar Group; **an integrated energy supplier dealing in the retail and wholesales of imported petroleum products.**

Max Energy's **petroleum products are competitively priced, and quality is assured** by reputable international surveyor organizations. Utilizing advanced dispenser machines, quantities are always precise. Customer service is deemed excellent, and **customer satisfaction is consistently high**; brand image is of paramount importance to Max Energy.

Its 79 filling stations are **conveniently located and strategically distributed across major cities and on major automobile routes** throughout the country. Operations are 24-hours a day and staff are comparatively well trained. EV charging stations are constructed at the existing filling stations compound as a sustainable business development execution. Max Energy operated a convenience store and coffee shop as part of its non-fuel retail business to provide a service and product of excellence by adding value for our customers and community.



Our Objectives

- To build a strong brand name of Max Energy in Myanmar Fuel Energy Market.
- To effectively distribute high-quality fuel products imported from abroad to consumers and other users.
- To provide valued-added service to customers to achieve customers' satisfaction.
- To create better job opportunities for younger generation to enhance their personal lives and living standards.
- To contribute positively to social causes that would benefit company employees and society in general.



- To be a leading fuel service company and to be recognized as a reputable brand in Myanmar fuel industry for delivery on our commitments, embracing new opportunities and adding value to our customers, shareholders and community.



- To create a working environment where people are motivated to excel.
- To provide a service and product of excellence.
- To be reliable, professional, driven and highly competitive.
- To grow assets and increase productivity by leveraging on technology, creating a culture of continuous improvement.
- To be an environmentally responsible organization for future growth through good corporate governance and sustainable business practices.



- Excellence – Do things best in every aspect
- Quality – Provide best quality products and service
- Trust – Be integrity in all what we do



Statement of Commitment

To our stakeholders,

Reflecting on the past year, it has been a meaningful journey marked by both significant achievements and considerable challenges. The operating environment in Myanmar remained exceptionally complex, particularly for the energy sector. Throughout the year, the country experienced significant disruptions in fuel supply, foreign exchange constraints, and market uncertainties that tested the resilience of the entire industry. These challenges demanded agility, responsible leadership, and close collaboration among all stakeholders.

At Max Energy, we chose to view these challenges as an opportunity to demonstrate our commitment to the nation and the communities we serve. By working closely with policymakers, industry partners, financial institutions, and our dedicated employees, we actively contributed to maintaining a stable and reliable fuel supply across Myanmar. Through open dialogue, constructive collaboration, and disciplined execution, we successfully navigated these unprecedented circumstances while continuing to support the country's essential energy needs.

Our ability to overcome these challenges was made possible by the unwavering dedication of our employees, whose professionalism, resilience, and commitment never wavered despite the difficult operating environment. I extend my sincere appreciation to every member of the Max Energy family, as well as to our customers, business partners, suppliers, regulators, and stakeholders, whose trust and cooperation enabled us to move forward together.

At Max Energy, we take pride not only in what we have accomplished, but also in the values that have guided every decision we made. Every challenge has strengthened our determination to innovate, collaborate, and create sustainable value for our customers, employees, business partners, shareholders, and the communities we serve. As we look ahead, we remain committed to building a resilient, responsible, and future-ready energy company that contributes to Myanmar's economic development while creating long-term value for all stakeholders.



I am pleased to reaffirm Max Energy Co., Ltd.'s continued commitment to the United Nations Global Compact (UNGC) and its Ten Principles in the areas of Human Rights, Labour, Environment, and Anti-Corruption. Since joining the UN Global Compact, we have continued to embed these principles into our corporate strategy, governance framework, business operations, and organizational culture. We believe that responsible business practices are not only the foundation of sustainable growth but also essential for building resilience during periods of uncertainty.

This Communication on Progress (CoP) outlines the initiatives and actions we have undertaken to integrate the UN Global Compact's principles throughout our organization. It reflects our continued commitment to ethical leadership, environmental stewardship, respect for human rights, fair labour practices, transparency, and sound corporate governance. We also recognize that long-term business success must go hand in hand with creating positive social and environmental impact.

As we move forward, we remain committed to contributing to the United Nations Sustainable Development Goals (SDGs), strengthening stakeholder trust, advancing sustainable business practices, and supporting Myanmar's journey toward a more resilient and sustainable energy future. Together, we will continue to build a stronger, more responsible, and more inclusive future for generations to come.

Sincerely Yours,

Daw Nu Nu Wai

Managing Director



Max Energy And UN Global Compact



Since our establishment, Max Energy has actively implemented CSR initiatives. In 2012, we became aware of the United Nations Global Compact (UNGC), the world's largest corporate responsibility initiative, with over 23,000 corporate participants across more than 160 countries.

In January 2013, Max Energy has become a proud registered participants in the United Nations Global Compact (UNGC). This was our corporate milestone for **Max Energy**, which is the first to participate in UNGC among Myanmar Fuel Oil Retail business industry.

Our alignment with the UNGC has strengthened our commitment to ethical business practices, responsible organization, and community development—positively impacting lives and contributing to a more sustainable future.

Besides, **Max Energy** has been actively supporting to Ayeyarwady Foundation which is a non-profit organization founded by Max Myanmar Group in 2010. Together with the Ayeyarwady Foundation, we contribute meaningfully to Myanmar's education, health, sport and environmental sectors to uplift communities and create lasting, positive change in society.



As our business strategy is rooted in sustainability, we created many milestones as a responsible organization and still on the path to shape a better future for all the human beings.



UN Global compact 10 principles

Human Rights

PRINCIPLE 1

Businesses should support and respect the protection of Internationally Proclaimed Human Rights.

PRINCIPLE 2

Make sure businesses are not complicit in Human Right Abuses.

Environment

PRINCIPLE 7

Businesses should support a precautionary approach to environmental challenges.

PRINCIPLE 8

Undertake initiatives to promote greater environmental responsibility.

PRINCIPLE 9

Encourage the development and diffusion of environmentally friendly technologies.

Labour Standards

Principle 3

Businesses should uphold freedom of association and effective recognition of the right to collective bargaining.

Principle 4

The elimination of all forms of forced and compulsory labour.

Principle 5

The effective abolition of child labour.

Principle 6

Eliminate discrimination in respect of employment and occupation.

Anti-corruption

PRINCIPLE 10

Businesses should work against all forms of corruption, including extortion and bribery.

Human Rights

Principle 1

Businesses should support and respect the protection of Internationally Proclaimed Human Rights.

Principle 2

Make sure businesses are not complicit in Human Right Abuses.





Assessments, Policy & Goals

The UN Guiding Principles on Business and Human Rights are strictly followed by Max Energy. Throughout our organizational policies and operational practices, we uphold a zero-tolerance policy against child labor, forced labor, and any kind of workplace discrimination. Our human right assessment not only focus on diversity, equity and inclusion but also workplace safety.

We have successfully enforced the Human Rights policy by Max Myanmar Group and strictly follow these polices in running the business. This policy is embedded in our corporate governance framework and applies to all employees, contractors, and business partners.

In accordance with the Republic of the Union of Myanmar's current labor laws, Max Energy upholds thorough and current human resource policy guidelines, rules and regulations. These policies support employees throughout their employment and provide a fair, transparent, and lawful framework for addressing concerns.

Besides, at Max Energy, our philanthropic initiatives are deeply rooted in our commitment to upholding and advancing human rights. Our philanthropic efforts focus on empowering vulnerable communities, promoting equal access to healthier environment.

Looking ahead, Max Energy remains committed to expanding its philanthropic footprint and deepening its impact on human rights through strategic partnerships and sustainable community development programs. Max Energy demonstrates its commitment to transparency by openly sharing relevant policies, initiatives, and best practices with stakeholders through its official digital platforms.

* Our Human Rights Policy available to be downloaded at :

https://www.maxenergy.com.mm/wp-content/uploads/2020/03/human_right_policy.pdf

** Our Whistle Blowing Policy available to be downloaded at :

https://www.maxenergy.com.mm/wp-content/uploads/2020/03/whistle_blowing_policy.pdf



Implementation

Max Energy supports the Universal Declaration of Human Rights and incorporates its principles into operations. The company prohibits child labor and maintains a zero-tolerance policy against violence and unethical behavior, including discrimination, forced labor, slavery and property destruction. These standards are enforced through internal policies, compliance audits, staff training, and a reporting system to ensure accountability and improvement.

Our Occupational Health, Safety, and Environment (OHSE) team has put in place comprehensive policies and procedures to protect the health and safety of both employees and customers. The measures include preventive measures, regular safety training, and the provision of essential safety equipment and facilities. Max Energy reaffirms its commitment to human rights and responsible business practices through these initiatives.

Max Energy promotes a safe and inclusive workplace environment by supporting employee rights, encouraging open communication, and adhering to fair employment practices. The company upholds human rights, dignity, and corporate responsibility across all its operations through mechanisms for reporting wrongdoing, feedback channels, fair working conditions, and a firm commitment to ethical business practices. Employees are engaged under conditions that are fair, transparent, and equitable, encompassing regulated working hours, formal employment contracts, and respectful labour relations, as well as equitable pay. Across all levels of operation, our decision-making is guided by this principle, reflecting our commitment to upholding human dignity and corporate responsibility.

Max Energy is deeply committed to advancing human rights through its various charitable efforts. We consistently collaborate with the AYA Foundation to provide a better health and a better future for our communities. In support of community health and social well-being, Max Energy has been making regular monthly donations of generator fuel and oxygen to Yankin Children's Hospital, and this assistance continues to the present day. Moreover, during periods of economic instability, we prioritized the creation of job opportunities for local residents.



Measurement Outcomes

Max Energy demonstrated its commitment to ethical practices during the reporting period by reporting **zero** human rights grievances and no violations, including child labor, forced labor, or infringements on indigenous or religious rights. Our company's management team, which is a reflection of our commitment to gender equality, consists of a **50/50** male to female ratio, with a female Managing Director at the helm, despite the overall workforce being comprised of **65%** male and **35%** female employees.

In addition, between July 2025 and June 2026, we successfully recruited **714** new employees, the majority of whom are local residents near our newly established stations. This initiative supports local employment, strengthens community engagement, and promotes sustainable development.

Health and safety are of paramount importance at Max Energy. Our facilities are equipped with essential items including fire safety systems and emergency kits, and we operate in full compliance with regulations, having secured approval from the Myanmar Fire Safety Department. The HSE team ensured that all contractor personnel understood the site's HSE requirements before starting work by conducting induction training and kickoff meetings to cover station hazardous area classification, workplace hazards, site safety rules, the permit to work (PTW) system, and emergency response procedures as part of their Contractor Safety Management Program for **seven** projects. As a result, Max Energy Lost Time Incidents (LTI) days is (**1527**) until the end of June 2026.

As a conscientious company, Max Energy has sponsored Myanmar Women's League for **800** million kyats and Myanmar Football Federation for **150** million kyats so as to promote gender equality, empower female athletes and build inclusive communities. In addition, we consistently provide **one** barrel of generator fuel and **7** lakhs of raw oxygen every month as a regular monthly donation to Yankin Children's Hospital through AYA foundation. In addition, as a socially responsible and supportive healthcare system, our employees voluntarily donate their blood at the National Blood Centre in Myanmar.



Myanmar Women's League Sponsorship



Myanmar Women's League Sponsorship



Contractor Safety Management Meeting



Contractor Safety Management Meeting



Blood Donation



Blood Donation



Labour Standard

Principle 3 **Businesses should uphold freedom of association and effective recognition of the right to collective bargaining.**

Principle 4 **The elimination of all forms of forced and compulsory labour.**

Principle 5 **The effective abolition of child labor.**

Principle 6 **Eliminate discrimination in respect of employment and occupation.**





Assessments, Policy & Goals

Max Energy fully supports the core conventions and principles of the International Labour Organization (ILO). We conduct internal assessments to ensure compliance with national labour laws and international labour standards. These assessments cover safe working conditions, fair wages and working hours, freedom of association and collective bargaining, the prevention of child labour, forced labour, and discrimination.

Our Employee Handbook is carefully developed to reflect our values, encompassing key topics such as equal opportunity employment and a zero-tolerance policy for child and forced labour. Occupational Health and Safety Policy is strictly enforced to maintain a safe and healthy work environment. These are distributed to all staff for their professional rights and responsibilities, and to ensure clear understanding of company policies. Additionally, we uphold fair employment practices by following appropriate recruitment principles throughout our hiring process.

Our core principles and objectives are to ensure a safe working environment, eradicate forced labour, child labour, and discrimination by raising awareness and providing training as well as enhancing internal oversight and third-party audits. We are committed to delivering a grievance handling system that is effective, timely, fair, and accessible to all, guaranteeing equal treatment for every complainant.

* Max Energy policies available to be downloaded at :

<https://www.maxenergy.com.mm/corporate-policies/>



Implementation

Max Energy does not employ individuals under the age of 18 years, in accordance with regulations set by Myanmar's Ministry of Labor, and strongly opposes all forms of forced labor. Our recruitment process is strictly merit-based, focusing on candidates' skills, experience, and capabilities, regardless of age, race, gender, physical condition, religion, or family status. A range of employee training and knowledge-sharing programs have been established to enhance professional skills and foster continuous learning and promoting sustainable company growth.

Max Energy is dedicated to ensuring a safe and healthy workplace for all staff members, regardless of their position or gender. We obtain fire safety licenses for all filling stations nationwide from the Myanmar Fire Safety Department to ensure workplace safety. Our offices are equipped with first aid and emergency toolkits to deal with unexpected situations. The Myanmar Fire Safety Department conducts basic fire safety training for employees and organizes awareness programs to educate staff on how to respond effectively during fire emergencies.

Max Energy promotes employee growth through internal transfers, job attachments, and special assignments. We also invest in training programs that support both employee development and organizational growth.

Max Energy promotes transparency, accountability, and freedom of expression through labor union support, regular employee engagement meetings, and accessible feedback mechanisms, including workplace suggestion boxes.

Healthcare programs and employee welfare activities are also implemented to motivate employees by providing them with seasonal flu vaccines and health insurance, thereby protecting their workforce from financial hardship due to medical emergencies. Football competitions are organized to foster team spirit and promote physical wellbeing. Compensation and benefits system is practiced at Max Energy to retain valuable employees.



Measurement Outcomes

Max Energy regularly evaluates labor standards through internal audits, employee feedback, and compliance checks. Key outcomes include zero reported cases of child or forced labor that increased employee satisfaction, and enhanced gender balance in leadership roles as resulted 50:50. These results reflect our commitment to ethical labor practices and continuous improvement.

Max Energy gives priority to all feedback, suggestions, and complaints received via meetings, suggestion boxes, and online platforms. Top management and our whistleblowing committee handle issues with care until they are resolved. Max Energy's integrity, trust, and strong employee engagement were recognized as a result.

We continuously seek opportunities for sustainable growth by adhering to HR policies and labor laws. Between July 2025 and June 2026, Max Energy provided orientation training for **215** employees and PPHP training for **153** staff members. Max Energy's HSE team conducted **440** fire emergency drills, **18** HSE training sessions for **407** staff members, **monthly** fire drill practice at all stations and **93** workplace safety inspections to ensure a safe working environment during the reporting period. As a result, the number of Max Energy Lost Time Incidents (LTI) days stands at **1527** until the end of June 2026, with **45** employees being recognized through the Safety Excellence Award Program for demonstrating outstanding safety performance and commitment.

The company also offers welfare support to staff during major life events like weddings and funerals to foster a caring and supportive work environment. Management offers over 200 lakh kyats stipends to employees' children to alleviate family-related stress. Additionally, Max Energy provides health insurance for its employees via AYA Sompoo Insurance, at a cost of approximately 150 million kyats. A total of 61 staff members made a claim for their benefits. The company provided support for all employees who wanted to receive flu vaccinations during the influenza season. The company held a football competition during the reporting period to enhance teamwork and promote physical health.



Fire Safety Training



Fire Safety Training



Orientation Training



Orientation Training



Flu Vaccines



Flu Vaccines



Football Competition



Max Energy (၁၅) နှစ်ပြည့် အထိမ်းအမှတ် ဇူလိုင်လပြည့်နေ့ ဆုပေးပွဲ ပုံရိပ်များ

Staff Party



Environment

Principle 7

Businesses should support a precautionary approach to environmental challenges.

Principle 8

Undertake initiatives to promote greater environmental responsibility.

Principle 9

Encourage the development and diffusion of environmentally friendly technologies.





Assessments, Policy & Goals

To fulfill one of our mission statements, we prioritize the promotion of sustainable living: **“To be an environmentally responsible organization for future growth through good corporate governance and sustainable business practices.”**

The organization has carried out an assessment of energy consumption and its effects, creating green areas and ensuring legal compliance before commencing new filling stations.

Max Energy is dedicated to ensuring a safe and healthy working environment for all its stakeholders. The company's comprehensive OHSE Policy ensures that employees are aware of workplace risks and are equipped to manage them effectively. In line with its 'Safety First' core value, the OHSE Department incorporates preventive safety measures into its monthly planning and operations.

Max Energy is dedicated to advancing and implementing environmentally sustainable technologies. The company aims to enhance digitalization throughout its operations in order to improve efficiency and environmental performance. Management aims to make a positive contribution to community wellness by providing continuous support and implementing responsible corporate initiatives.

* Our Occupational Health And Safety Policy available to be downloaded at :

https://www.maxenergy.com.mm/wpcontent/uploads/2020/03/occupational_health_and_safety.pdf



Implementation

Max Energy has implemented a robust Health, Safety, and Environmental (HSE) management framework that is supported by comprehensive policies, rules, regulations, and procedures. The company's framework highlights its dedication to sustainable practices, responsible operations, and industry leadership.

Max Energy has set up an Occupational Health, Safety, and Environment (OHSE) Committee to facilitate the creation of a healthier and safer workplace environment. The company ensures employee preparedness by hosting regular safety training sessions, weekly safety knowledge sharing sessions, and monthly fire drills, thereby ensuring readiness for potential workplace and environmental hazards. We also strictly adhere to national safety regulations by obtaining approval from the Myanmar Fire Safety Department and installing all necessary safety equipment in accordance with official procedures.

Max Energy is dedicated to promoting environmentally sustainable practices throughout its business activities. Our premises have seen an expansion in the number of EV charging stations to support the transition to cleaner transportation. The organization has expanded solar electricity usage at kiosks to decrease generator fuel consumption. Our digitalization efforts are operating effectively in the HR system, operation system, and control mechanism, significantly reducing paper usage and improving operational efficiency in a timely manner through the adoption of modern technologies.

To support climate action, Max Energy regularly expands green spaces through tree-planting activities and environmental initiatives. The company also conducted the Max Energy Run event to promote community health, environmentally friendly and sustainable lifestyles among stakeholders.



Measurement Outcomes

Max Energy acknowledges the significance of workplace safety and has implemented proactive measures to guarantee a secure setting for all staff members. During the reporting period, we conducted safety training sessions a total of 18 times and fire drill practice 440 times, equipping staff with the knowledge to prevent and respond effectively to emergency situations. As a result of these efforts, there were no lost-time incidents reported. Additionally, based on the lagging indicators from the internal OHSE department report, there was no recorded environmental impact. Besides, all kiosks are duly certified by the Myanmar Fire Services Department and operate in accordance with relevant laws, regulations, and safety standards.

To support sustainable development and reduce air pollution, Max Energy currently operates five (5) EV charging stations, while three (3) additional stations are under development. Solar energy systems are also in use at five (5) service stations, with expansion plans underway. These initiatives have enabled some stations to eliminate generator fuel consumption entirely, reducing carbon emissions and enhancing environmental sustainability.

Max Energy continues to drive digital transformation across its operations. The digital card system for corporate credit customers has reached 93% implementation, substituting paper vouchers and contributing to reduced paper usage, improved efficiency, and more sustainable business practices.

In June 2026, Max Energy planted nearly 300 trees at Municipal road, Dala Township and Danote Pagoda compound to expand green spaces and support environmental conservation. The company's organized running event has also promoted a healthier and more environmentally friendly lifestyle. Sweeping and cleaning activity at Shwedagon Pagoda has supported a healthier and cleaner environment.

Overall, Max Energy's business operations have not caused any severe environmental damage. The company remains committed to promoting sustainable development and building a greener future for the nation, communities, and all stakeholders.





Anti-Corruption

Principle 10

Businesses should work against all forms of corruption, including extortion and bribery.





Assessments, Policy & Goals

Max Energy is committed to transparency, accountability, and conducting its business in an ethical manner. The company's operations and decision-making processes are guided by these principles, which demonstrate our dedication to the highest standards of corporate governance. Our financial position, operational performance, and ownership structure are subject to review by relevant government authorities and independent external auditors. Strong governance, transparency, and ethical practices are considered essential for achieving long-term sustainability, business success, and protecting shareholders' interests. In accordance with our publicly disclosed Anti-Corruption Policy, all business activities are conducted in compliance.

Max Energy adopts a zero-tolerance approach to corruption, bribery, and extortion. All employees are expected to comply fully with the company's policies and procedures, and the acceptance of gifts or benefits that could influence business conduct is strictly forbidden.

One of our objectives is to build a strong brand name in the market, and to achieve this, management has established strict guidelines for quality and quantity assurance. We build trust with our stakeholders by demonstrating a commitment to integrity, fair dealing and good corporate governance practices.

* Our Code of Conduct and Anti-corruption Policy available to be downloaded at :

https://www.maxenergy.com.mm/wp-content/uploads/2020/03/anti-corruption_policy.pdf

<https://www.maxenergy.com.mm/corporate-policies/>



Implementation

Our implementation framework is designed to ensure adherence to the Anti-Corruption Policy and uphold the highest standards of business ethics across all operations.

To promote transparency, integrity, and accountability, management regularly engages with employees and reinforces the company's Code of Conduct through orientation training for new hires. The company also maintains a whistleblowing system to encourage the reporting of unethical behavior and minimize the risk of misconduct and irregularities.

Max Energy maintains a strong internal control framework to promote transparency, accountability, and ethical business conduct. The Internal Audit Team regularly reviews transactions and payments to prevent corruption and bribery, while the Central Control Room monitors operational compliance and fuel transportation activities. Annual external audits and independent fuel quality assessments provide additional assurance of compliance and integrity. The company also operates through dedicated committees that ensure effective oversight, segregation of duties, and balanced decision-making. In addition, a strict no-gambling policy is enforced, with disciplinary measures applied to any violations.

Max Energy maintains a robust Whistleblowing Policy to foster a culture of integrity and ethical conduct. Through confidential reporting channels such as workplace suggestion boxes, social media platforms, and emergency helplines, employees are empowered to raise concerns regarding corruption, misconduct, or policy violations, helping the company effectively manage compliance risks and uphold high standards of corporate governance.



Measurement Outcomes

To ensure customer confidence and regulatory compliance, Max Energy maintains a robust quality and quantity assurance system. All products are tested and certified by recognized government laboratories, including the MPPE Laboratory and PPRD Mobile Laboratory, while product quantities are independently verified by SGS. As a result, the company consistently delivers high-quality products that comply with applicable standards and specifications.

Max Energy fosters a culture of transparency and accountability via confidential reporting mechanisms, operational oversight, and stringent internal safeguards. The Central Control Centre, GPS tracking systems, and suggestion boxes all contribute to the effective oversight of operations, with thorough investigations and timely corrective and preventive actions taken in response to reported concerns. Through its commitment to quality, integrity, and responsible business practices, the company has gained the trust and recognition of the public and its stakeholders.

Max Energy and its employees maintain a clean record of tax compliance, with no breaches in payment reported to date. As part of our commitment to financial transparency and accountability, our financial status is regularly assessed by external auditors, including Myanmar Vigour & Associates Ltd. (Myanmar), the Internal Revenue Department (IRD) for tax audits, and the Ministry of Commerce for import-related evaluations.

Whenever audit findings identify areas for improvement or instances of non-compliance, the company takes full responsibility by implementing timely corrective actions and strengthening internal controls. Through its proactive approach to continuous improvement, transparency, and responsible business practices, Max Energy continues to uphold its reputation as a trusted and reputable organization.





This is our **Communication on Progress** in implementing the principles of the **United Nations Global Compact** and supporting broader UN goals.

We welcome feedback on its contents.



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