



# GRI Content Index

2025/26

## MAX MYAMAR GROUP - GRI CONTENT INDEX 2025/26

This report is in accordance with the Global Reporting Initiative (GRI) Standards: Comprehensive option. To locate the topics and standards contained within the guidelines, and our responses to these standards, use the index below.

| GRI standard | GRI Disclosure | Location and Notes |
|--------------|----------------|--------------------|
|--------------|----------------|--------------------|

### GRI 101: FOUNDATION 2016 GENERAL DISCLOSURES

#### ORGANIZATIONAL PROFILE

### GRI 102: GENERAL DISCLOSURE

|        |                                                              |                                                                                                                                                                                               |
|--------|--------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 102-1  | Name of the organization                                     | Max Myanmar Group                                                                                                                                                                             |
| 102-2  | Activities, brands, products, and service                    | Highway and Toll, Construction, Manufacturing, Trading, Energy, Logistics, Hotel, Agriculture                                                                                                 |
| 102-3  | Location of headquarters                                     | 123, Alanpya Pagoda Road, Dagon Township                                                                                                                                                      |
| 102-4  | Location of operations                                       | Our Business on Website                                                                                                                                                                       |
| 102-5  | Ownership and legal form                                     | Ownership and Share Allocation                                                                                                                                                                |
| 102-6  | Markets served                                               | Our Businesses                                                                                                                                                                                |
| 102-7  | Scale of the organization                                    | Our Businesses                                                                                                                                                                                |
| 102-8  | Information on employees and other workers                   | Non-Financial Highlights<br>People and Society<br>Code of Conduct<br>Inclusive Workforce                                                                                                      |
| 102-9  | Supply chain                                                 | <a href="https://maxmyanmargroup.com/responsible-business-practices/#1566808319594-9b05d58b-ec93">https://maxmyanmargroup.com/responsible-business-practices/#1566808319594-9b05d58b-ec93</a> |
| 102-10 | Significant changes to the organization and its supply chain | There were no significant changes to size, structure or ownership during the reporting period.                                                                                                |
| 102-11 | Precautionary principle or approach                          | <a href="https://maxmyanmargroup.com/risk-management-and-internal-control/">https://maxmyanmargroup.com/risk-management-and-internal-control/</a>                                             |

| GRI Standard                | GRI Disclosure                                                                | Location and Notes                                                                                                                                                                                                                                                                                     |
|-----------------------------|-------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 102-12                      | External initiatives                                                          | <a href="https://maxmyanmargroup.com/people-and-society/#1566794255038-8b301761-e3da">https://maxmyanmargroup.com/people-and-society/#1566794255038-8b301761-e3da</a><br><a href="https://maxmyanmargroup.com/stakeholder-value-creation/">https://maxmyanmargroup.com/stakeholder-value-creation/</a> |
| 102-13                      | Membership of associations                                                    | <a href="https://maxmyanmargroup.com/people-and-society/">https://maxmyanmargroup.com/people-and-society/</a>                                                                                                                                                                                          |
| <b>Strategy</b>             |                                                                               |                                                                                                                                                                                                                                                                                                        |
| 102-14                      | Statement from senior decision-maker                                          | <a href="https://maxmyanmargroup.com/about-us/">https://maxmyanmargroup.com/about-us/</a><br>Letter from Founder                                                                                                                                                                                       |
| 102-15                      | Key impacts, risks, and opportunities                                         | <a href="https://maxmyanmargroup.com/maxs-erm-framework/">https://maxmyanmargroup.com/maxs-erm-framework/</a>                                                                                                                                                                                          |
| <b>ETHICS AND INTEGRITY</b> |                                                                               |                                                                                                                                                                                                                                                                                                        |
| 102-16                      | Values, principles, standards, and norms of behavior                          | <a href="https://maxmyanmargroup.com/corporate-governance/">https://maxmyanmargroup.com/corporate-governance/</a>                                                                                                                                                                                      |
| 102-17                      | Mechanisms for advice and concerns about ethics                               | <a href="https://maxmyanmargroup.com/corporate-policies/corporate-hr-policies/#1566143363424-18a5885f-03ff">https://maxmyanmargroup.com/corporate-policies/corporate-hr-policies/#1566143363424-18a5885f-03ff</a>                                                                                      |
| <b>GOVERNANCE</b>           |                                                                               |                                                                                                                                                                                                                                                                                                        |
| 102-18                      | Governance structure                                                          | <a href="https://maxmyanmargroup.com/corporate-governance/">https://maxmyanmargroup.com/corporate-governance/</a>                                                                                                                                                                                      |
| 102-19                      | Delegating authority                                                          | <a href="https://maxmyanmargroup.com/corporate-governance/governance-framework/">https://maxmyanmargroup.com/corporate-governance/governance-framework/</a>                                                                                                                                            |
| 102-20                      | Executive-level responsibility for economic, environmental, and social topics | <a href="https://maxmyanmargroup.com/corporate-governance/governance-framework/">https://maxmyanmargroup.com/corporate-governance/governance-framework/</a>                                                                                                                                            |
| 102-21                      | Consulting stakeholders on economic, environmental, and social topics         | <a href="https://maxmyanmargroup.com/sustainability-direction/materiality-assessment/">https://maxmyanmargroup.com/sustainability-direction/materiality-assessment/</a>                                                                                                                                |

| GRI Standard | GRI Disclosure                                                           | Location and Notes                                                                                                                                                                                                                                                                                                                                                                                  |
|--------------|--------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 102-22       | Composition of the highest governance body and its committees            | <a href="https://maxmyanmargroup.com/corporate-governance/governance-manual/">https://maxmyanmargroup.com/corporate-governance/governance-manual/</a>                                                                                                                                                                                                                                               |
| 102-23       | Chair of the highest governance body                                     | <a href="https://maxmyanmargroup.com/corporate-governance/governance-manual/">https://maxmyanmargroup.com/corporate-governance/governance-manual/</a>                                                                                                                                                                                                                                               |
| 102-24       | Nominating and selecting the highest governance body                     | <a href="https://maxmyanmargroup.com/corporate-governance/governance-manual/">https://maxmyanmargroup.com/corporate-governance/governance-manual/</a>                                                                                                                                                                                                                                               |
| 102-25       | Conflicts of interest                                                    | Conflicts of Interest Policy                                                                                                                                                                                                                                                                                                                                                                        |
| 102-26       | Role of highest governance body in setting purpose, values, and strategy | <a href="https://maxmyanmargroup.com/corporate-governance/governance-manual/">https://maxmyanmargroup.com/corporate-governance/governance-manual/</a>                                                                                                                                                                                                                                               |
| 102-27       | Collective knowledge of highest governance body                          | <a href="https://maxmyanmargroup.com/corporate-governance/governance-manual/">https://maxmyanmargroup.com/corporate-governance/governance-manual/</a>                                                                                                                                                                                                                                               |
| 102-28       | Evaluating the highest governance body's performance                     | <a href="https://maxmyanmargroup.com/corporate-governance/governance-manual/">https://maxmyanmargroup.com/corporate-governance/governance-manual/</a>                                                                                                                                                                                                                                               |
| 102-29       | Identifying and managing economic, environmental, and social impacts     | <p>We analyze our impact on SDGs added a new perspective on the assessment of the most important issues for Max Myanmar by clustering under four categories such as economic, people, environment and community.</p> <p><a href="https://maxmyanmargroup.com/sustainability-direction/materiality-assessment/">https://maxmyanmargroup.com/sustainability-direction/materiality-assessment/</a></p> |
| 102-30       | Effectiveness of risk management processes                               | <p>The management board of Max Myanmar cannot, however, rely solely on the embedded monitoring processes within the company to discharge its responsibilities. It should regularly receive and review reports on internal control.</p> <p><a href="https://maxmyanmargroup.com/risk-management-and-internal-control/">https://maxmyanmargroup.com/risk-management-and-internal-control/</a></p>     |
| 102-31       | Review of economic, environmental, and social topics                     | <p>We believe that adopting business strategies and activities that meet the needs of the enterprise and its stakeholders today while protecting, sustaining and enhancing the human and natural resources that will be needed in the future for long-term.</p> <p><a href="https://maxmyanmargroup.com/sustainability-direction/">https://maxmyanmargroup.com/sustainability-direction/</a></p>    |
| 102-32       | Highest governance body's role in sustainability reporting               | Max Myanmar Group's Sustainability Report is reviewed by the Board of Directors and Governance Committee.                                                                                                                                                                                                                                                                                           |
| 102-33       | Communicating critical concerns                                          | Max Group is engaging and communicating more with its stakeholders through social media and in-person meetings. It has participated in a variety of local and international fora focused on responsible business in Myanmar, both with NGOs and industry groups.                                                                                                                                    |

|                               |                                                            |                                                                                                                                                                                                                                                                                                                                                                                        |
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|                               |                                                            | <a href="https://maxmyanmargroup.com/stakeholder-value-creation/#1566812360216-56c6ac01-a929">https://maxmyanmargroup.com/stakeholder-value-creation/#1566812360216-56c6ac01-a929</a>                                                                                                                                                                                                  |
| 102-34                        | Nature and total number of critical concerns               | This information is considered confidential.                                                                                                                                                                                                                                                                                                                                           |
| 102-35                        | Remuneration policies                                      | <a href="https://maxmyanmargroup.com/corporate-policies/operation-hr-policies-and-procedures/">https://maxmyanmargroup.com/corporate-policies/operation-hr-policies-and-procedures/</a>                                                                                                                                                                                                |
| 102-36                        | Process for determining remuneration                       | <a href="https://maxmyanmargroup.com/corporate-policies/operation-hr-policies-and-procedures/">https://maxmyanmargroup.com/corporate-policies/operation-hr-policies-and-procedures/</a>                                                                                                                                                                                                |
| 102-37                        | Stakeholders involvement in remuneration                   | N/A                                                                                                                                                                                                                                                                                                                                                                                    |
| 102-38                        | Annual total compensation ratio                            |                                                                                                                                                                                                                                                                                                                                                                                        |
| 102-39                        | Percentage increase in annual total compensation ratio     |                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>STAKEHOLDER ENGAGEMENT</b> |                                                            |                                                                                                                                                                                                                                                                                                                                                                                        |
| 102-40                        | List of stakeholder groups                                 | Stakeholder Mapping<br><a href="https://maxmyanmargroup.com/stakeholder-value-creation/#1566814942557-14ca1c16-d0ef">https://maxmyanmargroup.com/stakeholder-value-creation/#1566814942557-14ca1c16-d0ef</a>                                                                                                                                                                           |
| 102-41                        | Collective bargaining agreements                           | N/A                                                                                                                                                                                                                                                                                                                                                                                    |
| 102-42                        | Identifying and selecting stakeholders                     | Our Stakeholder engagement strategy will reflect the important component which interplays social, economic, cultural, and political considerations to our business activities and investment.<br><a href="https://maxmyanmargroup.com/stakeholder-value-creation/#1566812360201-acbea1a7-761c">https://maxmyanmargroup.com/stakeholder-value-creation/#1566812360201-acbea1a7-761c</a> |
| 102-43                        | Approach to stakeholder engagement                         | <a href="https://maxmyanmargroup.com/stakeholder-value-creation/#1566812360216-56c6ac01-a929">https://maxmyanmargroup.com/stakeholder-value-creation/#1566812360216-56c6ac01-a929</a>                                                                                                                                                                                                  |
| 102-44                        | Key topics and concerns raised                             | N/A                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>REPORTING PRACTICE</b>     |                                                            |                                                                                                                                                                                                                                                                                                                                                                                        |
| 102-45                        | Entities included in the consolidated financial statements | <a href="https://maxmyanmargroup.com/financial-highlights/">https://maxmyanmargroup.com/financial-highlights/</a>                                                                                                                                                                                                                                                                      |
| 102-46                        | Defining report content and topic Boundaries               | <a href="https://maxmyanmargroup.com/responsible-business-practices/">https://maxmyanmargroup.com/responsible-business-practices/</a>                                                                                                                                                                                                                                                  |
| 102-47                        | List of material topics                                    | <a href="https://maxmyanmargroup.com/sustainability-direction/materiality-assessment/">https://maxmyanmargroup.com/sustainability-direction/materiality-assessment/</a>                                                                                                                                                                                                                |
| 102-48                        | Restatements of information                                |                                                                                                                                                                                                                                                                                                                                                                                        |

| GRI Standard                              | GRI Disclosure                                                                 | Location and Notes                                                                                                                                                                                                   |
|-------------------------------------------|--------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 102-49                                    | Changes in reporting                                                           | <a href="https://maxmyanmargroup.com/sustainability-direction/sustainable-strategy/">https://maxmyanmargroup.com/sustainability-direction/sustainable-strategy/</a>                                                  |
| 102-50                                    | Reporting period                                                               |                                                                                                                                                                                                                      |
| 102-51                                    | Date of most recent report                                                     | Annual report for 2018-19 was published.                                                                                                                                                                             |
| 102-52                                    | Reporting cycle                                                                |                                                                                                                                                                                                                      |
| 102-53                                    | Contact point for questions regarding the report                               | <a href="https://maxmyanmargroup.com/contact/">https://maxmyanmargroup.com/contact/</a>                                                                                                                              |
| 102-54                                    | Claims of reporting in accordance with the GRI Standards                       | Reporting Standards                                                                                                                                                                                                  |
| 102-55                                    | GRI content index                                                              | Reporting Standards                                                                                                                                                                                                  |
| 102-56                                    | External assurance                                                             |                                                                                                                                                                                                                      |
| <b>MATERIAL TOPICS</b>                    |                                                                                |                                                                                                                                                                                                                      |
| <b>ECONOMIC PERFORMANCE</b>               |                                                                                |                                                                                                                                                                                                                      |
| <b>GRI 103: MANAGEMENT APPROACH 2016</b>  |                                                                                |                                                                                                                                                                                                                      |
| 103-1                                     | Explanation of the material topic and its Boundary                             | Annual Report<br>Business model for creating stakeholder value                                                                                                                                                       |
| 103-2                                     | The management approach and its components                                     | <a href="https://maxmyanmargroup.com/sustainability-direction/sustainable-strategy/">https://maxmyanmargroup.com/sustainability-direction/sustainable-strategy/</a>                                                  |
| 103-3                                     | Evaluation of the management approach                                          | <a href="https://maxmyanmargroup.com/sustainability-direction/sustainable-strategy/">https://maxmyanmargroup.com/sustainability-direction/sustainable-strategy/</a>                                                  |
| <b>GRI 201: ECONOMIC PERFORMANCE 2016</b> |                                                                                |                                                                                                                                                                                                                      |
| 201-1                                     | Direct economic value generated and distributed                                | <a href="https://maxmyanmargroup.com/financial-highlights/">https://maxmyanmargroup.com/financial-highlights/</a>                                                                                                    |
| 201-2                                     | Financial implications and other risks and opportunities due to climate change | Annual Report – Risk Sector<br><a href="https://maxmyanmargroup.com/risk-management-and-internal-control/">https://maxmyanmargroup.com/risk-management-and-internal-control/</a>                                     |
| 201-3                                     | Defined benefit plan obligations and other retirement plans                    | Man Power Planning Policy<br><a href="https://maxmyanmargroup.com/corporate-policies/operation-hr-policies-and-procedures/">https://maxmyanmargroup.com/corporate-policies/operation-hr-policies-and-procedures/</a> |
| <b>MARKET PRESENCE</b>                    |                                                                                |                                                                                                                                                                                                                      |
| <b>GRI 103: MANAGEMENT APPROACH 2016</b>  |                                                                                |                                                                                                                                                                                                                      |
| 103-1                                     | Explanation of the material topic and its Boundary                             | Boundary: Internal: Max Myanmar Group's Subsidiaries; Max employees and partners; External: Communities                                                                                                              |
| 103-2                                     | The management approach and its components                                     | <a href="https://maxmyanmargroup.com/sustainability-direction/sustainable-strategy/">https://maxmyanmargroup.com/sustainability-direction/sustainable-strategy/</a>                                                  |

|                                                |                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|------------------------------------------------|------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 103-3                                          | Evaluation of the management approach                                        | <a href="https://maxmyanmargroup.com/sustainability-direction/sustainable-development-goals/">https://maxmyanmargroup.com/sustainability-direction/sustainable-development-goals/</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>GRI 202: MARKET PRESENCE 2016</b>           |                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 202-1                                          | Ratios of standard entry level wage by gender compared to local minimum wage |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 202-2                                          | Proportion of senior management hired from the local community               | There is no foreign experts in management level.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>INDIRECT ECONOMIC IMPACTS</b>               |                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>GRI 103: MANAGEMENT APPROACH 2016</b>       |                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 103-1                                          | Explanation of the material topic and its Boundary                           | Boundary: Internal: Max Myanmar Group's Subsidiaries; Max employees and partners; External: Communities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 103-2                                          | The management approach and its components                                   | <a href="https://maxmyanmargroup.com/about-us/maxs-strategy/">https://maxmyanmargroup.com/about-us/maxs-strategy/</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 103-2                                          | Evaluation of the management approach                                        | <a href="https://maxmyanmargroup.com/sustainability-direction/sustainable-strategy/">https://maxmyanmargroup.com/sustainability-direction/sustainable-strategy/</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>GRI 203: INDIRECT ECONOMIC IMPACTS 2016</b> |                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 203-1                                          | Infrastructure investments and services supported                            | <p>Max Myanmar Group will not only strengthen its own business practices, but will help to build the foundation for responsible business practice in Myanmar. In this way, Max Myanmar Group has the potential to be a leading company that demonstrates to other Myanmar businesses the importance of acting responsibly, and how the private sector can do so in a way that is consistent with international best practices.</p> <p>Max Group is developing a culture of safety by making OHS part of daily work routines, particularly for those companies where it is needed most because of the type of operations (e.g. construction). Max Group has begun the process of supplier engagement on important topics such as labor law, OHS, and child labor. Max Group is also starting to shift its corporate culture to focus more on transparency. This has been done chiefly through publication of policies, reports, and related materials on its website and social media accounts.</p> |
| 203-2                                          | Significant indirect economic impacts                                        | <a href="https://maxmyanmargroup.com/sustainability-direction/sustainable-development-goals/">https://maxmyanmargroup.com/sustainability-direction/sustainable-development-goals/</a><br><a href="https://maxmyanmargroup.com/responsible-business-practices/">https://maxmyanmargroup.com/responsible-business-practices/</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>PROCUREMENT PRACTICES</b>                   |                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>GRI 103: MANAGEMENT APPROACH 2016</b>       |                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 103-1                                          | Explanation of the material topic and its Boundary                           | Boundary: Internal: Max Myanmar Group's Subsidiaries; Max employees and partners; External: Communities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 103-2                                          | The management approach and its components                                   | <a href="https://maxmyanmargroup.com/about-us/maxs-strategy/">https://maxmyanmargroup.com/about-us/maxs-strategy/</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 103-3                                          | Evaluation of the management approach                                        | <a href="https://maxmyanmargroup.com/sustainability-direction/sustainable-strategy/">https://maxmyanmargroup.com/sustainability-direction/sustainable-strategy/</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

| GRI 204: PROCUREMENT PRACTICES 2016     |                                                                                 |                                                                                                                                                                                                                                                                                    |
|-----------------------------------------|---------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 204-1                                   | Proportion of spending on local suppliers                                       | This information is considered confidential.                                                                                                                                                                                                                                       |
| ANTI-CORRUPTION                         |                                                                                 |                                                                                                                                                                                                                                                                                    |
| GRI 103: MANAGEMENT APPROACH 2016       |                                                                                 |                                                                                                                                                                                                                                                                                    |
| 103-1                                   | Explanation of the material topic and its Boundary                              | Boundary: Internal: Max Myanmar Group's Subsidiaries; Max employees and partners; External: Communities                                                                                                                                                                            |
| 103-2                                   | The management approach and its components                                      | Statements from Chairman and Group CEO                                                                                                                                                                                                                                             |
| 103-3                                   | Evaluation of the management approach                                           | <a href="https://maxmyanmargroup.com/corporate-policies/corporate-hr-policies/#1566143097783-2655afd8-7acd">https://maxmyanmargroup.com/corporate-policies/corporate-hr-policies/#1566143097783-2655afd8-7acd</a>                                                                  |
| GRI 205: ANTI-CORRUPTION 2016           |                                                                                 |                                                                                                                                                                                                                                                                                    |
| 205-1                                   | Operations assessed for risks related to corruption                             | Max Myanmar has been continuously collaborating with other institutions to develop effective solutions that support a zero-tolerance towards corruption. We support these initiatives and encourage our businesses to spread this best practice in other areas of their operation. |
| 205-2                                   | Communication and training about anti-corruption policies and procedures        | Anti-Corruption Practices<br><a href="https://maxmyanmargroup.com/corporate-policies/corporate-hr-policies/#1566143097746-259ebfb0-c2f4">https://maxmyanmargroup.com/corporate-policies/corporate-hr-policies/#1566143097746-259ebfb0-c2f4</a>                                     |
| 205-3                                   | Confirmed incidents of corruption and actions taken                             | This information is considered confidential.                                                                                                                                                                                                                                       |
| ANTI-COMPETITIVE BEHAVIOR               |                                                                                 |                                                                                                                                                                                                                                                                                    |
| GRI 103: MANAGEMENT APPROACH 2016       |                                                                                 |                                                                                                                                                                                                                                                                                    |
| 103-1                                   | Explanation of the material topic and its Boundary                              | Boundary: Internal: Max Myanmar Group's Subsidiaries; Max employees and partners; External: Communities                                                                                                                                                                            |
| 103-2                                   | The management approach and its components                                      | Code of Conduct<br><a href="https://maxmyanmargroup.com/corporate-policies/corporate-hr-policies/#1566143363424-18a5885f-03ff">https://maxmyanmargroup.com/corporate-policies/corporate-hr-policies/#1566143363424-18a5885f-03ff</a>                                               |
| 103-3                                   | Evaluation of the management approach                                           | <a href="https://maxmyanmargroup.com/corporate-governance/">https://maxmyanmargroup.com/corporate-governance/</a>                                                                                                                                                                  |
| GRI 206: ANTI-COMPETITIVE BEHAVIOR 2016 |                                                                                 |                                                                                                                                                                                                                                                                                    |
| 206-1                                   | Legal actions for anti-competitive behavior, anti-trust, and monopoly practices | Code of Conduct                                                                                                                                                                                                                                                                    |
| GRI 300 ENVIRONMENTAL STANDARDS SERIES  |                                                                                 |                                                                                                                                                                                                                                                                                    |
| MATERIALS                               |                                                                                 |                                                                                                                                                                                                                                                                                    |
| GRI 103: MANAGEMENT APPROACH 2016       |                                                                                 |                                                                                                                                                                                                                                                                                    |
| 103-1                                   | Explanation of the material topic and its Boundary                              | Boundary: Internal: Max Myanmar Group's Subsidiaries; Max employees and partners; External: Communities                                                                                                                                                                            |
| 103-2                                   | The management approach and its components                                      | <a href="https://maxmyanmargroup.com/sustainability-direction/materiality-assessment/">https://maxmyanmargroup.com/sustainability-direction/materiality-assessment/</a>                                                                                                            |
| 103-3                                   | Evaluation of the management approach                                           | We believe that adopting business strategies and activities that meet the needs of the enterprise and its stakeholders today while protecting, sustaining and enhancing the human and natural resources that will be needed in the future for long-term.                           |

| GRI 301: MATERIALS 2016           |                                                            |                                                                                                                                                                                                                                                                                                       |
|-----------------------------------|------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 301-1                             | Materials used by weight or volume                         | Information on total materials used by weight or volume unavailable at a company level.                                                                                                                                                                                                               |
| 301-2                             | Recycled input materials used                              | This information is considered confidential.                                                                                                                                                                                                                                                          |
| 301-3                             | Reclaimed products and their packaging materials           | Information not readily available.                                                                                                                                                                                                                                                                    |
| ENERGY                            |                                                            |                                                                                                                                                                                                                                                                                                       |
| GRI 103: MANAGEMENT APPROACH 2016 |                                                            |                                                                                                                                                                                                                                                                                                       |
| 103-1                             | Explanation of the material topic and its Boundary         | Sustainable Operations - Energy and Emissions, Minimizing our Supply Chain Impact                                                                                                                                                                                                                     |
| 103-2                             | The management approach and its components                 | Max Myanmar plans to adopt the ISO 14001:2004 Environmental Management System based on a solid sustainability framework in the near future in order to secure the future growth of both the corporation and the communities it operates in.                                                           |
| 103-3                             | Evaluation of the management approach                      | Max's environmental management includes understanding and assessing environmental impacts, reducing environmental impacts (e.g. waste, water and air emissions, biodiversity, etc), and ensuring transparency of actions taken and impact.                                                            |
| GRI 302: ENERGY 2016              |                                                            |                                                                                                                                                                                                                                                                                                       |
| 302-1                             | Energy consumption within the organization                 | Data available under Reporting Session on website <a href="https://maxmyanmargroup.com/responsible-business-practices/">https://maxmyanmargroup.com/responsible-business-practices/</a>                                                                                                               |
| 302-2                             | Energy consumption outside of the organization             | Nearly 50 Solar panels have been installed at Max Highway Co., Ltd Aung Lan Toll Gate to demonstrate group commitment to environmental sustainability. We always focus on actions taken to improve resource efficiency and reduce emissions will improve both economic and environmental performance. |
| 302-3                             | Energy intensity                                           | Data available under Reporting Session on website <a href="https://maxmyanmargroup.com/responsible-business-practices/">https://maxmyanmargroup.com/responsible-business-practices/</a>                                                                                                               |
| 302-4                             | Reduction of energy consumption                            | We always seek to use technological advances and innovative solutions to minimize the negative impact of our operations on the environment. At the same time, economical use of the most valuable and costly raw materials helps us to ensure the competitiveness sustainably.                        |
| 302-5                             | Reductions in energy requirements of products and services | Conservation of Resources Session on website                                                                                                                                                                                                                                                          |
| WATER                             |                                                            |                                                                                                                                                                                                                                                                                                       |
| GRI 103: MANAGEMENT APPROACH 2016 |                                                            |                                                                                                                                                                                                                                                                                                       |
| 103-1                             | Explanation of the material topic and its Boundary         | Sustainable Operations - Water Use, minimizing our Supply Chain Impact, Reducing Our Vehicle Footprint Boundary: Internal: Boundary: Internal: Max Myanmar Group's Subsidiaries; Max employees and partners; External: Communities.                                                                   |

|                                          |                                                             |                                                                                                                                                                                                                                                                                                                                           |
|------------------------------------------|-------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 103-2                                    | The management approach and its components                  | Sustainable Operations - Water Use, minimizing our Supply Chain Impact, Reducing Our Vehicle Footprint                                                                                                                                                                                                                                    |
| 103-3                                    | Evaluation of the management approach                       | <a href="https://maxmyanmargroup.com/responsible-business-practices/">https://maxmyanmargroup.com/responsible-business-practices/</a>                                                                                                                                                                                                     |
| <b>GRI 303: WATER 2016</b>               |                                                             |                                                                                                                                                                                                                                                                                                                                           |
| 303-1                                    | Water withdrawal by source                                  | Max's environmental management includes understanding and assessing environmental impacts, reducing environmental impacts (e.g. waste, water) and ensuring transparency of actions taken and impact.                                                                                                                                      |
| 303-2                                    | Water sources significantly affected by withdrawal of water | Data not available for Group level.                                                                                                                                                                                                                                                                                                       |
| 303-3                                    | Water recycled and reused                                   | Data not available for Group level.                                                                                                                                                                                                                                                                                                       |
| <b>EFFLUENTS AND WASTE</b>               |                                                             |                                                                                                                                                                                                                                                                                                                                           |
| <b>GRI 103: MANAGEMENT APPROACH 2016</b> |                                                             |                                                                                                                                                                                                                                                                                                                                           |
| 103-1                                    | Explanation of the material topic and its Boundary          | Boundary: Internal: Boundary: Internal: Max Myanmar Group's Subsidiaries; Max employees and partners; External: Communities.                                                                                                                                                                                                              |
| 103-2                                    | The management approach and its components                  | Waste reduction will be achieved through building design, and reuse and recycling efforts will be maintained throughout the construction process.<br>The General Contractor of Max Group need to develop, update, and post at the jobsite with a graph indicating the progress to date for achieving the project's waste management goal. |
| 103-3                                    | Evaluation of the management approach                       | <a href="https://maxmyanmargroup.com/reducing-environmental-impact/#1566794143807-92870427-eb14">https://maxmyanmargroup.com/reducing-environmental-impact/#1566794143807-92870427-eb14</a>                                                                                                                                               |
| <b>GRI 306: EFFLUENTS AND WASTE 2016</b> |                                                             |                                                                                                                                                                                                                                                                                                                                           |
| 306-1                                    | Water discharge by quality and destination                  | We follow the community voices and restrictions for water discharge points from sites.                                                                                                                                                                                                                                                    |
| 306-2                                    | Waste by type and disposal method                           | At each of our facilities, we practice waste management procedures strictly with total waste management contractors to follow all relevant laws and to dispose of waste in an environmentally and socially responsible way.                                                                                                               |
| 306-3                                    | Significant spills                                          | There are no significant spills.                                                                                                                                                                                                                                                                                                          |
| 306-4                                    | Transport of hazardous waste                                | <a href="https://maxmyanmargroup.com/wp-content/uploads/2019/08/Waste-Management-Plan.pdf">https://maxmyanmargroup.com/wp-content/uploads/2019/08/Waste-Management-Plan.pdf</a>                                                                                                                                                           |
| 306-5                                    | Water bodies affected by water discharges and/or runoff     | This indicator is not applicable because the impact captured by the indicator is insignificantly low.                                                                                                                                                                                                                                     |

| ENVIRONMENTAL COMPLIANCE                        |                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-------------------------------------------------|---------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| GRI 103: MANAGEMENT APPROACH 2016               |                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 103-1                                           | Explanation of the material topic and its Boundary            | Boundary: Internal: Boundary: Internal: Max Myanmar Group's Subsidiaries; Max employees and partners; External: Communities.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 103-2                                           | The management approach and its components                    | We are not only to sustain environment for future generation but also to rehabilitate the environmental damages. We believe that our corporate responsibility goes beyond our proprietary borders and therefore every effort will be made to conserve resources throughout our operations.                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 103-3                                           | Evaluation of the management approach                         | <a href="https://maxmyanmargroup.com/wp-content/uploads/2019/08/Environmental-Policy-of-Max-Myanmar.pdf">https://maxmyanmargroup.com/wp-content/uploads/2019/08/Environmental-Policy-of-Max-Myanmar.pdf</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| GRI 307: ENVIRONMENTAL COMPLIANCE 2016          |                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 307-1                                           | Non-compliance with environmental laws and regulations        | Max Myanmar Group has always been supporting the protection and preservation of our environment and committed to contribute to the sustainable hotel and tourism development in Myanmar. We are well aware of the importance of the need for Myanmar's costal tourism potential and the negative consequences of developmental intervention particularly sand mining on beaches.<br><a href="https://maxmyanmargroup.com/max-myanmar-group-supports-protection-of-myanmars-costal-tourism-beaches-and-anti-sand-mining-campaign-in-ngapali-beach/">https://maxmyanmargroup.com/max-myanmar-group-supports-protection-of-myanmars-costal-tourism-beaches-and-anti-sand-mining-campaign-in-ngapali-beach/</a> |
| SUPPLIER ENVIRONMENTAL ASSESSMENT               |                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| GRI 103: MANAGEMENT APPROACH 2016               |                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 103-1                                           | Explanation of the material topic and its Boundary            | Boundary: Internal: Boundary: Internal: Max Myanmar Group's Subsidiaries; Max employees and partners; External: Communities.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 103-2                                           | The management approach and its components                    | We promote consistency in procurement practices throughout the global supply chain, sharing its vision and principles with business partners and engaging with them to ensure their adoption.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 103-3                                           | Evaluation of the management approach                         | <a href="https://maxmyanmargroup.com/responsible-business-practices/#1566808319594-9b05d58b-ec93">https://maxmyanmargroup.com/responsible-business-practices/#1566808319594-9b05d58b-ec93</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| GRI 308: SUPPLIER ENVIRONMENTAL ASSESSMENT 2016 |                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 308-1                                           | New suppliers that were screened using environmental criteria | Suppliers Selecting Criteria                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| GRI 400 SOCIAL STANDARDS SERIES                 |                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| EMPLOYMENT                                      |                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| GRI 103: MANAGEMENT APPROACH 2016               |                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 103-1                                           | Explanation of the material topic and its Boundary            | Boundary: Internal: Boundary: Internal: Max Myanmar Group's Subsidiaries; Max employees and partners; External: Communities.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

|                                                 |                                                                                                    |                                                                                                                                                                                                                                                                                        |
|-------------------------------------------------|----------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 103-2                                           | The management approach and its components                                                         | we believe that building the diversity and inclusive workforce improves operational performance, influences innovative business strategies and drives positive results by advancing our workforce, cultivating an inclusive workplace and advancing our reputation in the marketplace. |
| 103-3                                           | Evaluation of the management approach                                                              | <a href="https://maxmyanmargroup.com/about-us/inclusive-workforce/">https://maxmyanmargroup.com/about-us/inclusive-workforce/</a>                                                                                                                                                      |
| <b>GRI 401: EMPLOYMENT 2016</b>                 |                                                                                                    |                                                                                                                                                                                                                                                                                        |
| 401-1                                           | New employee hires and employee turnover                                                           | <a href="https://maxmyanmargroup.com/non-financial-highlights/">https://maxmyanmargroup.com/non-financial-highlights/</a>                                                                                                                                                              |
| 401-2                                           | Benefits provided to full-time employees that are not provided to temporary or part-time employees | <a href="https://maxmyanmargroup.com/corporate-policies/operation-hr-policies-and-procedures/">https://maxmyanmargroup.com/corporate-policies/operation-hr-policies-and-procedures/</a>                                                                                                |
| 401-3                                           | Parental leave                                                                                     | More information on Employee Handbook                                                                                                                                                                                                                                                  |
| <b>LABOR/MANAGEMENT RELATIONS</b>               |                                                                                                    |                                                                                                                                                                                                                                                                                        |
| <b>GRI 103: MANAGEMENT APPROACH 2016</b>        |                                                                                                    |                                                                                                                                                                                                                                                                                        |
| 103-1                                           | Explanation of the material topic and its Boundary                                                 | Boundary: Internal: Boundary: Internal: Max Myanmar Group's Subsidiaries; Max employees and partners; External: Communities.                                                                                                                                                           |
| 103-2                                           | The management approach and its components                                                         | <a href="https://maxmyanmargroup.com/corporate-policies/operation-hr-policies-and-procedures/">https://maxmyanmargroup.com/corporate-policies/operation-hr-policies-and-procedures/</a>                                                                                                |
| 103-3                                           | Evaluation of the management approach                                                              | <a href="https://maxmyanmargroup.com/corporate-policies/operation-hr-policies-and-procedures/">https://maxmyanmargroup.com/corporate-policies/operation-hr-policies-and-procedures/</a>                                                                                                |
| <b>GRI 402: LABOR/MANAGEMENT RELATIONS 2016</b> |                                                                                                    |                                                                                                                                                                                                                                                                                        |
| 402-1                                           | Minimum notice periods regarding operational changes                                               | Max Myanmar Holding and its subsidiaries fully comply with applicable Myanmar Companies Law and other legal requirements for minimum notice periods regarding significant operational changes.                                                                                         |
| <b>OCCUPATIONAL HEALTH AND SAFETY</b>           |                                                                                                    |                                                                                                                                                                                                                                                                                        |
| <b>GRI 103: MANAGEMENT APPROACH 2016</b>        |                                                                                                    |                                                                                                                                                                                                                                                                                        |
| 103-1                                           | Explanation of the material topic and its Boundary                                                 | Boundary: Internal: Boundary: Internal: Max Myanmar Group's Subsidiaries; Max employees and partners; External: Communities and suppliers.                                                                                                                                             |
| 103-2                                           | The management approach and its components                                                         | We strongly believe that excellent health, and safety standards of our employees directly contribute to the success of the company and as such committed to ensure a safe working environment to enhance company's health and safety climate.                                          |
| 103-3                                           | Evaluation of the management approach                                                              | <a href="https://maxmyanmargroup.com/wp-content/uploads/2019/11/Occupational-Health-and-Safety-OHS-Policy.pdf">https://maxmyanmargroup.com/wp-content/uploads/2019/11/Occupational-Health-and-Safety-OHS-Policy.pdf</a>                                                                |
| 403-1                                           | Workers representation in formal joint management worker health and safety committee               | All of subsidiaries have OHS Team.                                                                                                                                                                                                                                                     |

|       |                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-------|-------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 403-2 | Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities | Under the session of Non-Financial Highlights                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 403-3 | Workers with high incidence or high risk of diseases related to their occupation                                              | Max Myanmar strongly believes that excellent health, and safety standards of our employees directly contribute to the success of the company and as such committed to ensure a safe working environment to enhance company's health and safety climate. Max Myanmar is committed to the goal of zero occupational injuries and operates regular safety programs with the aim of maintaining an accident-free record at all Max Myanmar business environments. In addition, each site and group company conduct fire and disaster prevention/evacuation drills. For example, Max Highway is striving hard to ensure the convenience and safety of the road users on its BOT roads. |
| 403-4 | Health and safety topics covered in formal agreements with trade unions                                                       | <a href="https://maxmyanmargroup.com/wp-content/uploads/2019/11/Occupational-Health-and-Safety-OHS-Policy.pdf">https://maxmyanmargroup.com/wp-content/uploads/2019/11/Occupational-Health-and-Safety-OHS-Policy.pdf</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

#### TRAINING AND EDUCATION

##### GRI 103: MANAGEMENT APPROACH 2016

|       |                                                    |                                                                                                                                                                          |
|-------|----------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 103-1 | Explanation of the material topic and its Boundary | Boundary: Internal: Boundary: Internal: Max Myanmar Group's Subsidiaries; Max employees and partners; External: Communities and suppliers.                               |
| 103-2 | The management approach and its components         | Orientation trainings and skill trainings were conducted in regular basis not only to welcome the new employee and make them aware of their rights and responsibilities. |
| 103-3 | Evaluation of the management approach              | <a href="https://maxmyanmargroup.com/non-financial-highlights/">https://maxmyanmargroup.com/non-financial-highlights/</a>                                                |

##### GRI 404: TRAINING AND EDUCATION 2016

|       |                                                                                      |                                                                                                                                                                       |
|-------|--------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 404-1 | Average hours of training per year per employee                                      | Under the session of Training on website<br><a href="https://maxmyanmargroup.com/non-financial-highlights/">https://maxmyanmargroup.com/non-financial-highlights/</a> |
| 404-2 | Programs for upgrading employee skills and transition assistance programs            | <a href="https://maxmyanmargroup.com/non-financial-highlights/">https://maxmyanmargroup.com/non-financial-highlights/</a>                                             |
| 404-3 | Percentage of employees receiving regular performance and career development reviews | <a href="https://maxmyanmargroup.com/non-financial-highlights/">https://maxmyanmargroup.com/non-financial-highlights/</a>                                             |

#### DIVERSITY AND EQUAL OPPORTUNITY

##### GRI 103: MANAGEMENT APPROACH 2016

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|-------|----------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|
| 103-1 | Explanation of the material topic and its Boundary | Boundary: Internal: Boundary: Internal: Max Myanmar Group's Subsidiaries; Max employees and partners; External: Communities and suppliers. |
|-------|----------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|

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|------------------------------------------------------|----------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 103-2                                                | The management approach and its components               | In Max Myanmar, we ensure all our employees can benefit freedom of religion and we make sure no discrimination and getting equal working environment in align with UDHR. Awareness trainings of Human Rights and Whistle Blowing policies were conducted among employee by the management.                                                                                                                                                                                                                 |
| 103-3                                                | Evaluation of the management approach                    | <a href="https://maxmyanmargroup.com/about-us/inclusive-workforce/">https://maxmyanmargroup.com/about-us/inclusive-workforce/</a>                                                                                                                                                                                                                                                                                                                                                                          |
| <b>GRI 405: DIVERSITY AND EQUAL OPPORTUNITY 2016</b> |                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 405-1                                                | Diversity of governance bodies and employees             | <a href="https://maxmyanmargroup.com/non-financial-highlights/">https://maxmyanmargroup.com/non-financial-highlights/</a>                                                                                                                                                                                                                                                                                                                                                                                  |
| 405-2                                                | Ratio of basic salary and remuneration of women to men   | <a href="https://maxmyanmargroup.com/non-financial-highlights/">https://maxmyanmargroup.com/non-financial-highlights/</a>                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>NON-DISCRIMINATION</b>                            |                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>GRI 103: MANAGEMENT APPROACH 2016</b>             |                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 103-1                                                | Explanation of the material topic and its Boundary       | Boundary: Internal: Boundary: Internal: Max Myanmar Group's Subsidiaries; Max employees and partners; External: Communities and suppliers.                                                                                                                                                                                                                                                                                                                                                                 |
| 103-2                                                | The management approach and its components               | We appreciate the diversity and individuality of our employee and do not discriminate based on personal characteristics such as nationality, gender, age, ethnicity, religion, sexual orientation or disability.                                                                                                                                                                                                                                                                                           |
| 103-3                                                | Evaluation of the management approach                    | <a href="https://maxmyanmargroup.com/wp-content/uploads/2019/08/Code-of-Conduct.pdf">https://maxmyanmargroup.com/wp-content/uploads/2019/08/Code-of-Conduct.pdf</a>                                                                                                                                                                                                                                                                                                                                        |
| <b>GRI 406: NON-DISCRIMINATION 2016</b>              |                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 406-1                                                | Incidents of discrimination and corrective actions taken | All incidents are promptly investigated and handled appropriately. The status of incidents and actions taken are not reported as this information is considered confidential.                                                                                                                                                                                                                                                                                                                              |
| <b>CHILD LABOR</b>                                   |                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 103-1                                                | Explanation of the material topic and its Boundary       | Boundary: Internal: Boundary: Internal: Max Myanmar Group's Subsidiaries; Max employees and partners; External: Communities and suppliers.                                                                                                                                                                                                                                                                                                                                                                 |
| 103-2                                                | The management approach and its components               | Max Myanmar does not use or employ child labor under any circumstances, as defined in the International Labour Organization Convention 182, Article 3 (Worst Forms of Child Labor). There is no recruitment of child labor by Max Myanmar or its sub-contractors in our workplace. If any incident of child labor is identified in Max Myanmar's industry, Max Myanmar shall initiate a program to transfer any children involved in child labor into quality education until they are no longer children. |
| 103-3                                                | Evaluation of the management approach                    | <a href="https://maxmyanmargroup.com/corporate-policies/corporate-hr-policies/#1566143426645-2a0e839c-e9fe">https://maxmyanmargroup.com/corporate-policies/corporate-hr-policies/#1566143426645-2a0e839c-e9fe</a>                                                                                                                                                                                                                                                                                          |

| GRI 408: CHILD LABOR 2016                |                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|------------------------------------------|-----------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 408-1                                    | Operations and suppliers at significant risk for incidents of child labor                           | We will be resolute in upholding human rights in everything we do and will not tolerate such discrimination in others. Ignorance and inaction do not constitute excuses for discrimination. Additionally, Max Myanmar is committed to implementing effective measures to protect migrant employees against any form of discrimination and to provide appropriate support services that reflect their special status.                                        |
| FORCED OR COMPULSORY LABOR               |                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| GRI 103: MANAGEMENT APPROACH 2016        |                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 103-1                                    | Explanation of the material topic and its Boundary                                                  | Boundary: Internal: Boundary: Internal: Max Myanmar Group's Subsidiaries; Max employees and partners; External: Communities and suppliers.                                                                                                                                                                                                                                                                                                                  |
| 103-2                                    | The management approach and its components                                                          | Employment is voluntary. Max Myanmar does not use forced, bonded or indentured labor, in-voluntary prison labor, slavery or trafficking of persons, or other forms of forced labor. Max Myanmar is responsible for employment eligibility fees, including recruitment fees.                                                                                                                                                                                 |
| 103-3                                    | Evaluation of the management approach                                                               | <a href="https://maxmyanmargroup.com/corporate-policies/corporate-hr-policies/#1566143426645-2a0e839c-e9fe">https://maxmyanmargroup.com/corporate-policies/corporate-hr-policies/#1566143426645-2a0e839c-e9fe</a>                                                                                                                                                                                                                                           |
| GRI 409: FORCED OR COMPULSORY LABOR 2016 |                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 409-1                                    | Operations and suppliers at significant risk for incidents of forced or compulsory labor Governance | Max Myanmar Group's Human Rights Policy reflects the Holdings commitment to conduct its business in a manner consistent with these principles and to protect and promote human rights within the company's sphere of influence. Assessment of the risk of forced or compulsory labor is included in Max Myanmar Group's audit processes and is part of our risk management.                                                                                 |
| HUMAN RIGHTS ASSESSMENT                  |                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| GRI 103: MANAGEMENT APPROACH 2016        |                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 103-1                                    | Explanation of the material topic and its Boundary                                                  | Boundary: Internal: Boundary: Internal: Max Myanmar Group's Subsidiaries; Max employees and partners; External: Communities and suppliers.                                                                                                                                                                                                                                                                                                                  |
| 103-2                                    | The management approach and its components                                                          | Max Myanmar acknowledges and respects the principles contained in the International Bill of Human Rights, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We recognize our responsibility to respect human rights and avoid complicity in human rights abuses, as stated in the UN Guiding Principles on Business and Human Rights, and we actively participate in the United Nations Global Compact. |
| 103-2                                    | Evaluation of the management approach                                                               | <a href="https://maxmyanmargroup.com/corporate-policies/corporate-hr-policies/#1566143426645-2a0e839c-e9fe">https://maxmyanmargroup.com/corporate-policies/corporate-hr-policies/#1566143426645-2a0e839c-e9fe</a>                                                                                                                                                                                                                                           |
| GRI 412: HUMAN RIGHTS ASSESSMENT 2016    |                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 412-1                                    | Operations that have been subject to human rights reviews or impact assessments                     | <a href="https://maxmyanmargroup.com/corporate-policies/corporate-hr-policies/#1566143426645-2a0e839c-e9fe">https://maxmyanmargroup.com/corporate-policies/corporate-hr-policies/#1566143426645-2a0e839c-e9fe</a>                                                                                                                                                                                                                                           |

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|------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                          |                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 412-2                                    | Employee training on human rights policies or procedures                                                                   | Under Training Session on Non-Financial Highlights<br><a href="https://maxmyanmargroup.com/non-financial-highlights/">https://maxmyanmargroup.com/non-financial-highlights/</a>                                                                                                                                                                                                                                                                                                                                               |
| 412-3                                    | Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening | We seek to establish relationships with entities that share the same respect for human rights as Max Myanmar. Max Myanmar will work with our suppliers, subcontractors and business community whenever possible to drive towards the adoption of comparable standards for their own operations.                                                                                                                                                                                                                               |
| <b>LOCAL COMMUNITIES</b>                 |                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>GRI 103: MANAGEMENT APPROACH 2016</b> |                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 103-1                                    | Explanation of the material topic and its Boundary                                                                         | Boundary: Internal: Boundary: Internal: Max Myanmar Group's Subsidiaries; Max employees and partners; External: Communities and suppliers.                                                                                                                                                                                                                                                                                                                                                                                    |
| 103-2                                    | The management approach and its components                                                                                 | With a corporate mission of Sharing and Contributing to the Community, Max Myanmar is committed to the community development in areas of financial, educational, charitable, cultural, and environmental causes.<br>Community engagement also comprises the provision of structures that facilitate career development and create job opportunities for young people. Max Myanmar also invites local communities to participate in the company's training programs, such as fire-fighting and occupational health and safety. |
| 103-3                                    | Evaluation of the management approach                                                                                      | <a href="https://maxmyanmargroup.com/people-and-society/">https://maxmyanmargroup.com/people-and-society/</a>                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>GRI 413: LOCAL COMMUNITIES 2016</b>   |                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 413-1                                    | Operations with local community engagement, impact assessments, and development programs                                   | Max Myanmar Group is engaging and communicating more with its stakeholders through social media and in-person meetings. It has participated in a variety of local and international community focused on responsible business in Myanmar, both with NGOs and industry groups.<br><a href="https://maxmyanmargroup.com/stakeholder-value-creation/">https://maxmyanmargroup.com/stakeholder-value-creation/</a>                                                                                                                |

|                                                 |                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-------------------------------------------------|----------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 413-2                                           | Operations with significant actual and potential negative impacts on local communities | <p>Since its inception in 1993, Max Myanmar Group has based its businesses in trading, construction, agriculture and livestock and fisheries. The group has properly compensated the farmers when acquiring land for development use obtained legally and in accordance with the laws, rules and regulations of the previous government. The Group never forces, influence high authorities in obtaining nor confiscate land, which will not be beneficial to the original landowners/farmers.</p> <p><a href="https://maxmyanmargroup.com/land-compensation-in-agriculture-sector/">https://maxmyanmargroup.com/land-compensation-in-agriculture-sector/</a></p> |
| <b>SUPPLIER SOCIAL ASSESSMENT</b>               |                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>GRI 103: MANAGEMENT APPROACH 2016</b>        |                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 103-1                                           | Explanation of the material topic and its Boundary                                     | Boundary: Internal: Boundary: Internal: Max Myanmar Group's Subsidiaries; Max employees and partners; External: Communities and suppliers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 103-2                                           | The management approach and its components                                             | Max Group has begun the process of supplier engagement on important topics such as labor law, OHS, and child labor. Formalizing this approach and continuing to integrate supplier engagement on CR performance into purchasing practices, training and development, and on-site review will help Max protect its own reputation while improving the safety of suppliers and their employees, along with environmental practices.                                                                                                                                                                                                                                 |
| 103-3                                           | Evaluation of the management approach                                                  | Max's Supply Chain Sustainability<br><a href="https://maxmyanmargroup.com/responsible-business-practices/#1566808319594-9b05d58b-ec93">https://maxmyanmargroup.com/responsible-business-practices/#1566808319594-9b05d58b-ec93</a>                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>GRI 414: SUPPLIER SOCIAL ASSESSMENT 2016</b> |                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 414-1                                           | New suppliers that were screened using social criteria                                 | We promote consistency in procurement practices throughout the global supply chain, sharing its vision and principles with business partners and engaging with them to ensure their adoption. We aim to achieve sustainable growth built on a foundation of mutual trust with its business partners. We always listen closely to and works with its new suppliers as equal partners, developing and maintaining cooperative and competitive relations that enable it to implement best practices.                                                                                                                                                                 |
| 414-2                                           | Negative social impacts in the supply chain and actions taken                          | No suppliers were terminated for negative impacts.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>PUBLIC POLICY</b>                            |                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>GRI 103: MANAGEMENT APPROACH 2016</b>        |                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 103-1                                           | Explanation of the material topic and its Boundary                                     | Boundary: Internal: Boundary: Internal: Max Myanmar Group's Subsidiaries; Max employees and partners; External: Government                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

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|----------------------------------------------------------------------------|-------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 103-2                                                                      | The management approach and its components                                    | We strive to explore the best working environment by creating opportunities for success and development while maintaining discipline and demeanor in consonance to the culture and values of the Group. In the process, a set of policies addressing to all dimensions have been created which we all have to learn, adopt and practice. These policies are the driving engine, the guiding principles, and the road map in the pursuit of our vision and mission.                                                                                                                  |
| 103-3                                                                      | Evaluation of the management approach                                         | Corporate HR Policies<br>Strategic HR Policies<br>Operational HR Policies and Procedures<br><a href="https://maxmyanmargroup.com/corporate-policies/corporate-hr-policies/">https://maxmyanmargroup.com/corporate-policies/corporate-hr-policies/</a>                                                                                                                                                                                                                                                                                                                               |
| <b>GRI 415: PUBLIC POLICY 2016</b>                                         |                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 415-1                                                                      | Political contributions                                                       | Max Myanmar Group does not make contributions to political candidates or political organizations as a matter of policy. While Max Myanmar has been seriously committed to philanthropies and services to our society, we do not make charitable donations or contributions to political parties.<br>We adopt zero tolerance to any form of bribery or corruption. We do not bribe any public official or private person and we do not accept any bribes. We always maintain honest and fair relationships with political organizations, government agencies and public authorities. |
| <b>CUSTOMER HEALTH AND SAFETY</b>                                          |                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>GRI 103: MANAGEMENT APPROACH 2016 103-1 Explanation of the material</b> |                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 103-1                                                                      | Explanation of the material topic and its Boundary                            | Boundary: Internal: Boundary: Internal: Max Myanmar Group's Subsidiaries; Max employees and partners; External: Customers and Suppliers                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 103-2                                                                      | The management approach and its components                                    | Max Group is developing a culture of safety by making OHS part of daily work routines, particularly for those companies where it is needed most because of the type of operations (e.g. construction). It has also created a monthly accident report which is published online. In addition, Max Group has started to map its risks across four areas: economic, people, environment, and community, to help determine where additional gaps in practice exist. Max Myanmar always care for customers' health and safety.                                                           |
| 103-3                                                                      | Evaluation of the management approach                                         | OHS Policy<br><a href="https://maxmyanmargroup.com/corporate-policies/strategic-hr-policies/#1566150043914-b59ecde9-6734">https://maxmyanmargroup.com/corporate-policies/strategic-hr-policies/#1566150043914-b59ecde9-6734</a>                                                                                                                                                                                                                                                                                                                                                     |
| <b>GRI 416: CUSTOMER HEALTH AND SAFETY 2016</b>                            |                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 416-1                                                                      | Assessment of the health and safety impacts of product and service categories | We set occupational health and safety goals and action plans to ensure implementation and improvements of occupational health and safety standards. To monitor occupational health and safety performance standards, we do regular site inspections, audits and reviews of company's OHS                                                                                                                                                                                                                                                                                            |

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|------------------------------------------|----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                          |                                                                                              | performance. The OHS team identifies foreseeable hazards and assets risks in respect of company's undertakings with suitable and sufficient control measures.                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>CUSTOMER PRIVACY</b>                  |                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>GRI 103: MANAGEMENT APPROACH 2016</b> |                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 103-1                                    | Explanation of the material topic and its Boundary                                           | Boundary: Internal: Boundary: Internal: Max Myanmar Group's Subsidiaries; Max employees and partners; External: Customers and Suppliers                                                                                                                                                                                                                                                                                                                                                                                                        |
| 103-2                                    | The management approach and its components                                                   | We believe that customer benefits and satisfaction are our heart of businesses. We expect our employees in all areas of our business to focus on providing best customer services and innovative solutions while adhering to the respective laws governing those activities. We strive for the highest customer satisfaction. We listen to our customers and provide solutions that add value and create mutual benefit for both parties. Max Group educates employees at the Group and subsidiary level about ongoing consumer rights issues. |
| 103-3                                    | Evaluation of the management approach                                                        | Max Myanmar Group has developed Customer Information Privacy Policy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>GRI 418: CUSTOMER PRIVACY 2016</b>    |                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 418-1                                    | Substantiated complaints concerning breaches of customer privacy and losses of customer data | This information is considered confidential.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>SMART TECHNOLOGY</b>                  |                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>GRI 103: MANAGEMENT APPROACH 2016</b> |                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 103-1                                    | Explanation of the material topic and its Boundary                                           | Boundary: Internal: Boundary: Internal: Max Myanmar Group's Subsidiaries; Max employees and partners; External: Customers and Suppliers                                                                                                                                                                                                                                                                                                                                                                                                        |
| 103-2                                    | The management approach and its components                                                   | Max Myanmar increases confidence in the usage of advance technology through integrated reporting system to enhance transparency for shareholders.                                                                                                                                                                                                                                                                                                                                                                                              |
| 103-3                                    | Evaluation of the management approach                                                        | Technology and Innovation Initiatives including developing Digital Dashboard, launching new Integrated Group Website and Reporting System, implementing Office365 Platform.                                                                                                                                                                                                                                                                                                                                                                    |