



Code of Conduct

At Shwe Than Lwin Group (the Group), our Code of Conduct serves as the cornerstone of our commitment to ethical and responsible business practices. This Code applies to all employees and sets the standards for personal and professional integrity when dealing with colleagues, customers, partners, and the broader community.

All employees are expected to adhere to the spirit and principles outlined in this Code, ensuring compliance with the laws and regulations of the regions in which we operate.

Legal and Regulatory Compliance

Employees must comply with all applicable laws and regulations. Adherence to these standards safeguards the Group's reputation and ensures operational integrity.

Sanctions and Embargoes

The Group prohibits direct or indirect involvement with any entities listed on international sanctions lists, including the United Nations, the U.S., the E.U., and the Asian Development Bank. Employees must consult the Risk Management and Assurance team before engaging in any transactions involving such entities.

Workplace Safety

We prioritise a safe and healthy work environment. All employees are responsible for performing their duties safely and promptly reporting potential hazards. Compliance with safety guidelines and proper use of protective equipment are mandatory.

Company Property and Assets

Employees must safeguard the Group's assets, including physical property, data, and intellectual property. Misuse, negligence, or unauthorised use of company resources is prohibited. All expenses and transactions must be properly documented and justified.

Ethical Behaviour

Employees are expected to conduct themselves respectfully and professionally, fostering a positive and inclusive workplace. Discrimination, harassment, or any form of inappropriate behaviour will not be tolerated and may result in disciplinary action.

While on duty, employees must not conduct themselves in such a manner that will interfere with or prevent other employees from carrying out their duties properly.

Integrity in Business Relationships

Strong, transparent relationships with customers and partners are vital. Employees must not engage in practices such as offering payments, gifts, or favours to influence business decisions. Confidentiality and respect for stakeholders' information are essential.

Substance-Free Workplace

Employees must remain fit for duty and avoid being under the influence of alcohol or drugs during work hours. Involvement with illegal substances is strictly forbidden.

Accurate Recordkeeping

Integrity in documentation is crucial. Employees must ensure the accuracy of all company records and avoid practices that may lead to improper reporting or concealment of information.

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Protecting Confidential Information

Employees must protect proprietary and sensitive information, including trade secrets and intellectual property, even after leaving the Group. Unauthorised disclosure or misuse of such information is prohibited.

Avoiding Conflicts of Interest

Employees must avoid situations where personal interests could conflict with their responsibilities to the Group. Any potential conflicts must be disclosed to management promptly.

Media Engagement

All media inquiries must be directed to the Communications Department to ensure consistent and accurate messaging about the Group's activities.

Disciplinary Measures

Violations of this Code may result in disciplinary action, including termination, and potential compensation for any damages caused.

By upholding these principles, we demonstrate our commitment to operating with integrity and maintaining the trust of all our stakeholders.