



## DAGON INTERNATIONAL LTD

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DOCUMENTTITLE:	<b>Anti-corruption and Bribery Policy</b>	
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### CORPORATE GOVERNANCE POLICIES, PRINCIPLES & GUIDELINES

It is DAGON INTERNATIONAL LTD's steadfast and firm policy to conduct all of our business in an honest and ethical manner. DAGON INTERNATIONAL LTD takes a strict approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates, and to implementing and enforcing effective systems to counter bribery.

DAGON INTERNATIONAL LTD will uphold Myanmar Anti-corruption and bribery law, relevant rules, regulations and directives issued by Myanmar Union Government, Regional Governments of Myanmar, Union and Regional legislature of Myanmar. Bribery and corruption are punishable for individuals by up to many years' imprisonment and if the Company is found to have taken part in corruption, it could face substantial fine, be excluded from tendering for public contracts and face damage to its reputation. DAGON INTERNATIONAL LTD therefore takes its legal responsibilities very seriously.

In strict adherence to this anti-corruption and bribery policy, it is compulsory to be zero corruption and zero bribery in third-party engagements and activities such as dealing with any individual or organization, DAGON INTERNATIONAL LTD and its staff come into contact with, during the course of work and business for DAGON INTERNATIONAL LTD, and third party includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives, officials and politicians and political parties.

This policy applies to all individuals working at all levels and grades, including general managers, senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with DAGON INTERNATIONAL LTD, wherever their workplace is located.

Each and every member of DAGON INTERNATIONAL LTD's staff force must ensure that he or she reads, understands and complies with this policy. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for DAGON INTERNATIONAL LTD or under its control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties. The giving or receipt of gifts is not prohibited, if the following requirements are met:



- a. it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- b. it complies with local law;
- c. it is given in the DAGON INTERNATIONAL LTD's name, not in individual's name;
- d. it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- e. it is appropriate in the circumstances - for example, in Myanmar, it is customary for gifts to be given at Myanmar Thadingyut Lighting Festival;
- f. taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time; and
- g. it is given openly, not secretly.

Gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of the Compliance Officer and/or Group Managing Director

DAGON INTERNATIONAL LTD appreciates that the market practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

It is not acceptable for an individual (or someone on his or her behalf) to:

- a. give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- b. give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- c. accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- d. accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- e. threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- f. engage in any activity that might lead to a breach of this policy.

DAGON INTERNATIONAL LTD only makes charitable donations that are legal and ethical under Myanmar laws and practices. No donation must be offered or made without the prior approval of the CSR Committee and the Managing Director.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for DAGON INTERNATIONAL LTD or under the Company's control. As such, every staff at DAGON INTERNATIONAL LTD must ensure that he or she reads, understands and complies with this



policy and must notify the Compliance Officer as soon as possible if believed or suspected that a conflict with this policy has occurred, or may occur in the future.

Any employee who breaches this policy will face disciplinary action, which could even result in dismissal for gross misconduct.

Training on this policy forms part of the induction process for all new employees and other workers. All existing employees and workers will receive regular, relevant training on how to implement and adhere to this policy. The Company's strict approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of its business relationship with them and as appropriate thereafter.

The board of directors has overall responsibility for ensuring this policy complies with DAGON INTERNATIONAL LTD's legal and ethical obligations, and that all those under the Company's control comply with it. Comments, suggestions and queries should be addressed to the Compliance Office or to Managing Director.