

	<p>Issue Date : July 2020 Effective Date : Aug 2020</p>
<p>ANTI-CORRUPTION POLICY</p>	<p>APPROVED BY HR</p>

Anti-Corruption Policy

1. Objective

A Bank believes that corruption could be detrimental for the development of the country and potentially create negative consequences for the organization. A Bank has established this anti-corruption policy in order to enhance A Bank’s employees’ professional standards and integrity in carrying out the business dealings, to comply with Anti-Corruption Law, to develop a good governance system, to avoid conflict of interest and ensure transparency.

2. Definition

"Bribery" means the promising, offering or discussing or giving to an authorized official, directly or indirectly, of an undue advantage, for the official himself or another person or entity, in order that the official acts or refrains from acting in the exercise of his official duties, in order to obtain or retain business or other undue advantage.

"Bribe" means the consideration or receiving without giving reasonable price, with the purpose of bribery or giving money, property, gift, service fee, entertainment and other illegal benefit

“Hospitality” means the payment for food, accommodation, transportation and other indirect forms of payment.

Gift means goods, personal goods, food stuff, cosmetics, alcoholic beverages and gift cards, gift cheques which will enable the recipient to buy these indirectly.

"Public Official" means any permanent or temporary employee working in any position of legislature, administration and judiciary, whether or not he or she is appointed or selected, receives salary or allowance, is working in a public department, organization or specified as a public service man under any existing law.

"Bank's Authorized Personnel" means bank directors, officials and employee who has the right to make decisions or choose or manage due to his/her position or business nature.

"Individuals who need to comply" means A Bank's Board of Directors, senior management officials, employees from all branches and departments.

3. Regulations to follow

Individuals who need to comply from A Bank shall comply with the followings.

- (a) Individuals who need to comply shall not give bribe, gift or hospitality to Public Official or Bank's Authorized Personnel.
- (b) Bank's Authorized Personnel shall not accept a bribe, gift or hospitality from a third party if they know or suspect that it is offered or provided with an expectation that a business advantage will be provided in return that will negatively impact the benefits or interest of the bank.

4. Exception

In extending hospitality or gifts, the following guidelines published by the President Office may be followed.

- (a) Gifts with a value of no more than 25,000 kyats (the maximum value of gifts which may be received from a person or organization within a year shall be 100,000 kyats)

(b) Gifts with a value of no more than 100,000 kyats and which are given on a special annual occasion such as Christmas or Thadingyut.

Note: gifts allowed as exception do not include money or that could be directly or indirectly liquidated as money.

If the hospitality or gifts were to exceed the amount allowed as exception, it should be reported to Legal and Compliance Department and then to the Managing Director along with remarks form Legal and Compliance Department.

If bank employees receive gifts from bank's customers, business partners, contractors or suppliers (individuals or organizations) of A Bank on special occasion such as Christmas or Thadingyut, he/she will report to the line supervisor and shall transfer to the Bank's Anti-Corruption Watch Team as the Bank's property.

5. Disciplinary action

It should be understood that non-compliance with the anti-corruption may receive judgement form the senior management bank officials and result in penalties as per the employee policies. Additionally, non-compliant individuals shall receive criminal or civil penalties as pe the Section 57 of the Anti-Corruption Law.

6. Establishing Anti-Corruption Watch Team

A Bank's BOD shall establish Anti-Corruption Watch Team with a minimum of three members to implement the bank's anti-corruption policy and define the team's roles and responsibilities.

7. Miscellaneous

The HR Department shall brief the existing bank employees and the new employees about the anti-corruption policy and record evidence that the employees have read the anti-corruption policy. The pledge that the employees shall comply with anti-corruption policy shall also be made.

