

Whistleblowing Policy

1. Overview and Purpose

1.1 Employees are often the first to realise that there may be irregularities within a Company. However, employees may not express their concerns for fear of being disloyal to their colleagues or to the Company. They may also be afraid of discrimination or harassment. In such circumstances, employees may feel that it is best to ignore the concern rather than to report it.

1.2 External parties who have dealings with the Company (such as our business partners and customers) may also avoid raising a concern of potential irregularities for the same reasons.

1.3 EFD Group does not tolerate any malpractice, impropriety, statutory non-compliance or wrongdoing by staff in the course of their work. This Policy is intended to provide a framework to promote responsible and secure whistle blowing without fear of adverse consequences. The Policy aims to create a work environment where our employees, business partners, customers and other stakeholders can raise concerns on misconduct, irregularities or malpractices, without fear of harassment and/or victimization and with an assurance that their concerns will be taken seriously and investigated.

2. Scope

This policy applies to all EFD employees (permanent, contract and temporary), contractors, consultants and all other workers in the company and its subsidiaries, including all personnel affiliated with third parties.

3. Policy

3.1 This policy is intended to encourage our employees and other relevant stakeholders to report unethical or illegal conduct. The objectives include:

- Encourage timely reporting of alleged malpractices/misconduct;
- Provide a confidential channel for escalation without fear of reprisal;
- Ensure consistent and timely response to reported improprieties and awareness by whistle blowers of their options;
- Ensure appropriate oversight by the Management;
- Serve as a means of preventing and deterring any misconduct;
- Protect the rights of EFD Group; and,
- Promote a culture of openness, accountability and integrity.

3.2 Reporting Mechanisms.

3.2.1 The Whistleblower should report his/her concern to the Chairman Office, where an appointed staff from the Chairman Office will handle the reported cases and ensure that issues raised are properly resolved by Management or such parties as appropriate.

3.2.2 The channels of reporting are as follows:

Mailing Address:

Chairman Office - Whistleblowing
No. 5 (A), Pyay Road, Ward (10),
Hlaing Township, Yangon, Myanmar

Email: chairmanoffice@efdgroup.com

3.2.3 All reports will be assessed to ensure that they are fairly and properly considered. As it is essential to have all critical information to effectively evaluate and investigate a complaint, the report made should provide as much information and be as specific as possible.

3.2.4 Employees and external parties are encouraged to put their names to their allegations whenever possible. Concerns or irregularities expressed anonymously are difficult to act upon effectively, but they will be considered, depending on the:

- Seriousness of issues raised;
- Significance and credibility of the concerns;
- Likelihood of confirming the allegation from attributable sources and information provided.

3.3 Confidentiality.

3.3.1 All reports are handled confidentially, except as necessary or appropriate to conduct investigation and to take remedial action, in accordance with the applicable laws and regulations. In this regard, the

- Identity of the person making the allegation will be kept confidential and confined to the Investigating Committee so long as it does not hinder or frustrate any investigation;

- Investigation process may reveal the source of the information to persons involved in the investigation or resolution of the investigation report; and
- The person making the report may need to provide a statement as part of the gathering of evidence required.

3.3.2 If you raise a genuine concern and “whistleblow” under this Policy, you will not be at risk of losing your job or suffer retribution or harassment, if you are acting in good faith, it does not matter if you are mistaken.

3.3.3 However, the Company does not condone any frivolous, mischievous or malicious allegations. Employee(s) making such allegations shall face disciplinary action in accordance with the Company’s disciplinary procedures. The Policy is also not a route for taking up personal grievances.

4. Policy Compliance

4.1 Compliance Measurement

The Group will verify compliance to this policy through various methods, including but not limited to feedback to the policy owner.

4.2 Exceptions

Any exception to the policy must be approved by the policy owner in advance.

4.3 Non-Compliance

An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment. We may take legal action in cases of any unlawful behavior.