



Whistle Blowing Policies

Serge Pun & Associates (Myanmar) Ltd., (“the Company”) is committed to achieving the highest standards of integrity and accountability within its internal structure. With this in mind, the Company has developed these Procedures for reporting improprieties (the “Policy”) where all employees (the “Employees”) with serious concerns about the Company’s activities and operations may come forward and voice these concerns with the assurance that swift action will be taken if necessary.

This Policy makes it very clear that Employees may report improprieties or suspected improprieties without fear of victimization, subsequent discrimination or any form of disadvantage whatsoever. In fact, this Policy intends to empower Employees to raise potentially serious concerns within the Company rather than letting them escalate or possibly seeking alternative externally.

This Policy is a clear and unambiguous statement of the Company’s commitment that any impropriety by the Company or any of its employees, directors, or officers, once identified and reported, will be dealt with in expeditious manner and thoroughly investigated and subsequently remedied. The Company will also use its best endeavors to explore and implement policies to ensure that such impropriety can be prevented in the future.

This reporting mechanism invites and encourages all Employees to act responsibly and impartially to uphold the reputation of the Company and maintain public confidence in it. Nurturing and developing a culture of openness and transparency within the organization will further aid and expedite this process.

Further background to this Policy is summarized in the list of questions and answer below. This write-up is intended to serve as a guide to Employees only and they are encouraged to carefully read the Policy in the full as attached to this Guide.

SECTION A: WHISTLE BLOWING POLICIES

BACKGROUND/FREQUENTLY ASKED QUESTION

1. What is whistleblowing?

Employees are usually uniquely situated within the Company and amongst the first to know when something is going wrong in the Company. A culture of “turning a blind eye” to such problems usually means that the alarm will not be sounded and management will not have a chance to take necessary appropriate action before substantial damage results. Whistleblowing can therefore be described as providing information about potentially illegal and/or unethical practices i.e. impropriety within the Company.

2. What is impropriety?

Impropriety involves any unlawful, illegal, unethical or otherwise improper behavior and can include, amount others:

- a. An unlawful act, whether civil or criminal;
- b. Breach of or failure to implement or comply with approved the Company policy;
- c. Utilizing the Company’s funds in an unauthorized manner;



- d. Not observing the Group's internal and financial control procedures and policies;
- e. Questionable accounting or auditing practices;
- f. Abuse of power or authority for any unauthorized or ulterior purpose;
- g. Intentional provision of incorrect information to public bodies; and
- h. Suppressing or attempting to suppress any information relating to the above.

3. What is the intention of the Policy?

This Policy aims to:

- a. Encourage Employees to feel confident about raising concerns and to question and act upon such concerns;
- b. Provide an outlet for employees to raise their concerns and acquire feedback on any action taken as a result;
- c. Reassure Employees that they will be protected from possible reprisals or victimization provided that they raise their concerns in good faith and reasonably believe them to be true;
- d. Caution Employees that, where more appropriate measures and procedures are available, for example:
 - i. the personnel department for matters concerning personal grievances; or
 - ii. the human resource department for complaints about personal benefits, whistleblowing may not be the appropriate method or forum to adopt.

4. Who should make complaints?

Any Employees who makes a disclosure or raises a concern under this Policy will be protected if the individual:

- a. Discloses the information in good faith;
- b. Has reasonable grounds to believe it to be substantially true;
- c. Does not act maliciously; and
- d. Does not seek any personal or financial gain.

5. Who should you contact?

The Company's open door policy suggests that individuals share their questions, concerns, suggestions or complaints with someone who can address them properly. As such, directors



who are Non-Executive of the management (the “Non-Executive Directors”) are in the best position to address any area of concern or complaints raised or received. Information received will be treated with the utmost confidentiality and will be attended to by appropriate personnel appointed by the Board. Any whistle-blowing report involving any Director or member of senior management (having designation of “Head/Chief/Managing Director of a Division” and above) may be reported directly to the Non-executive Vice Chairman following email communication channels:-

- martinpun@yomastrategic.com

or such other email address as may be instructed by the Chairman of the Management .

6. Company response

All whistle-blowing reports, other than reports involving any Director, member of senior management (having designation of “Head/Chief/Managing Director of a Division” and above) shall be received by the Director, who will log all reports into a register. The Management shall conduct an initial review of the report received and recommend the remedial, disciplinary or other action to be taken action taken by the The Company will depend on the nature of the concern. All investigations shall be reported to the Management for their attention and further action as necessary. The matters raised may:-

- be investigated internally
- be referred to external auditor
- be referred to appropriate law enforcement agencies
- be investigated by an independent inquiry

In the event that the whistle-blowing reports involve any Director, member of the senior management or the Non-executive Vice Chairman, the reports shall be escalated to the Chairman of the Board, for his attention and further action as necessary.

In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Some concerns may be resolved by agreed action without the need for investigation. If urgent action required, this will be taken before any investigation is conducted.

The Company will take steps to minimize any difficulties, which the complainant may experience as a result of raising a concern. For instance, if a complainant is required to give evidence in a criminal or disciplinary proceeding, the Company will arrange for them to receive advice on what to expect.

The Company accepts that complainant needs to be assured that the matter has been properly and adequately addressed. Therefore, subject to legal constraints, the Company will use reasonable endeavors to inform the complainant of the outcome of any investigation.



7. What safeguards are there for Employees?

The Company will not tolerate any harassment or victimization (including formal pressures) and will take appropriate action to protect those who raise a concern in good faith.

No action will be taken against anyone who makes an allegation in good faith, reasonably believing it to be true, even if the allegation is not subsequently confirmed by the investigation. Efforts will be made to ensure confidentiality as far as this is reasonably practical.

8. Can the concern be taken outside of the Company?

This Policy is intended to provide an avenue within the Company to raise concerns. If an Employee takes any matter outside the Company, he or she would ensure that no disclosure of confidential information takes place.

9. Confidentiality and Anonymity

The Company will respect the confidentiality of any complaint received by the Complaint where the complainant requests such confidentiality. However, it must be appreciated that it will be easier to follow up on matters and to verify complaints if the complainant is prepared to give his or her name. Anonymity will not allow the Company to follow up with the complainant and this make any investigation more difficult or incomplete. If the situation arises where the concern is not able to be resolved satisfactorily without revealing the complainant's identity (for instance, because evidence needs to be presented in court), the Company will discuss with the complainant on how best to proceed.

10. Malicious, Mischievous and False Allegation

The Company is proud of its reputation of having high standards of integrity. It will therefore ensure that adequate resources are put into investigation any complaint that it receives. However, the Company will regard the making of any frivolous, bad faith, malicious, mischievous or false allegations by any employee of the Company as a serious disciplinary offence that may result in disciplinary action, up to and including dismissal for cause.