

	Myanma Awba Group			
	Anti-harassment, Anti-bullying and Non-discrimination Policy			
	BU & Dept	Group – Sustainability Dept	Document No.	GRP-POL-009-SCC-01-2026
	Approved By	Group CEO	Version	V1-20260319
	Issued By	Process & Policy Dept	Effective Date	01-07-2026

Anti-harassment, Anti-bullying and Non-discrimination Policy

1. POLICY PURPOSE

- 1.1 Myanma Awba Group recognises the diversity of its workforce and understands that for the business to function in the best way, all workers must be valued, treated with respect.
- 1.2 This policy sets out Myanma Awba Group's approach to promoting an inclusive and equal opportunity, safe and happy working environment with the primary aim of providing equality for all, preventing all forms of discrimination, harassment, bullying and fostering positive and productive relationships between all people including diverse groups.
- 1.3 Myanma Awba Group recognises the right of every employee and relevant stakeholder (advisers, consultants, contractors, sub-contractors, suppliers, partners, volunteers, interns) to attend work and to perform their duties without being subjected to any form of discrimination, harassment and bullying.
- 1.4 Myanma Awba Group will not tolerate any forms of discrimination, harassment, bullying or victimisation of employees or third parties who work on Myanma Awba Group's behalf.
- 1.5 Myanma Awba Group aims to create an inclusive working environment to maximise the potential of all staff by providing equal opportunities in all aspects of employment including but not limited to in the recruitment, training and development of employees, and to pro-actively tackling and eliminating discrimination, harassment and bullying.
- 1.6 By implementing this policy, Myanma Awba Group sets out that any forms of discrimination, harassment, sexual harassment and bullying will not be tolerated. Disciplinary action, up to and including termination of employment/cessation of engagement, may be taken against workers who breach this policy.

2. SCOPE & AUDIENCE

- 2.1 The rights and obligations set out in this policy apply equally to all employees engaged by Myanma Awba Group, which includes, but is not limited to:
- Board members; or

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- Leadership and management personnel (e.g. Managing Directors, CEOs, directors, general managers, team leaders, heads of department; or
- Human resources managers, managers, supervisors, officers; or
- Full-time, part-time, project team staffs, seasonal and casual employees; or
- Consultants with part-time/ full time contract (paid); or
- Contractors, sub-contractors and secondees (e.g. freelance agents who have been contracted or sub-contracted for a specific purpose); and
- Job candidates, volunteers or intern and anyone working in an unpaid capacity; or
- Contractor or sub-contractor; or
- An employee of a job agency (e.g, security, cleaner, driver) who has been assigned to work in the company/organisation; or and also, to associated persons such as secondees, service contractors, or services and others agreed or contracted under different contract types.

2.2 Every employee or persons mentioned in clause 2.1 have personal responsibility for the compliance of this policy as amended from time to time. As part of the employee induction, or service contractor induction, all employees or different types of contractors are expected to read and familiarise by self with this policy, ensure that this policy is properly observed and fully complied with and to complete the declaration of this policy.

2.3 While every worker is required to comply with this policy, this policy is not incorporated as a term of any employment contract or contract for services and does not create any rights enforceable by an employee against Myanmar Awba Group. To the extent that there is an inconsistency between the relevant and legislated laws and this policy, the relevant and legislated law will prevail.

3. THE POLICY STATEMENT

3.1 Myanmar Awba Group is committed to providing a safe and happy working environment for all its employees which is free from discrimination, bullying on any ground and from harassment at work including sexual harassment.

3.2 Myanmar Awba Group will operate a zero-tolerance policy for any forms of discrimination, bullying, harassment including sexual harassment whether it takes place within Myanmar Awba Group premises or outside, including at social events, business trips, training sessions or conferences sponsored by Myanmar Awba Group.

3.3 All complaints or reporting of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimized for making such a complaint.

3.4 Every employee or persons mentioned in clause 2.1 who harasses others will face disciplinary action, up to and including dismissal from employment.

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4. THE APPLICATION OF POLICY

4.1 This policy applies while the employee is at work. It also extends to work-related functions and to conduct outside of work where there is a sufficient connection to the workplace, including, but not limited to, the following circumstances:

- The way in which Myanmar Awba Group provides products to customers, services to customers and interacts with members of the public;
- All aspects of employment; recruitment and selection; conditions and benefits; training and promotion; task allocation; shifts; hours; leave arrangements; workload; equipment and transport;
- On-site, off-site or after-hours work; work-related social functions (such as event nights, after activities, award nights and industry events); tours, work-related travel, member/client functions, promotional activities, workshops, conferences, seminars, webinars or advisory or training sessions – wherever and whenever employees may be as a result of their Myanmar Awba Group duties;
- Use of social media and other electronic communication (e.g. emails); and
- Employees' treatment of other employees, clients, visitors and members of the public encountered in the course of undertaking their duties for Myanmar Awba Group.

5. COMMITMENT

5.1 Every employee is entitled to a working environment that promotes dignity, equality and respect for all. Myanmar Awba Group will not tolerate any acts of harassment, bullying, discrimination committed against an employee, contractor, job applicant or visitor including types of contractors and employees mentioned clause 2.1 because of characteristic including but not limited to following:

- Gender and gender identity;
- Parental status or status as a carer/ family responsibility;
- Race, colour, national origin or ethnic background;
- A disability, disease or injury, including work-related injury;
- Age;
- Sexual orientation preference; (including homosexuality, lesbianism, bisexuality and heterosexuality);
- Religion, religious beliefs and activity;
- Pregnancy, breastfeeding, maternity and paternity;
- Marital status;
- Political opinion, beliefs and activity;
- Social origin;
- Medical records;
- Physical appearance;

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- Relationship status;
- Race and ethnicity;
- Health;
- Associating with someone who has, or is assumed to have, one of these above characteristics;

5.2 Any types of discrimination, harassment, bullying on the basis of work pattern (part-time working, fixed term contract, flexible working) will also not be tolerated.

5.3 Also, employees and types of employments and contractors mentioned in clause 2.1 may also be personally liable for any acts of discrimination prohibited by this policy that they commit. No form of discrimination will be tolerated in Myanmar Awba Group.

6. DEFINITION WITH EXAMPLES

6.1 Discrimination

Discrimination occurs when a person is treated less favorably than others because of characteristics that are not related to the person's competencies or the inherent requirements of the job. All workers and job seekers have the right to be treated equally, regardless of any attributes other than their ability to do the job.

(Notes: ILO- Business, Non-Discrimination and Equality, https://www.ilo.org/empent/areas/business-helpdesk/WCMS_DOC_ENT_HLP_BDE_EN/lang--en/index.htm).

This Policy is underpinned by the potential types and forms of discrimination outlined below to show the commitment of Myanmar Awba Group in any forms of discrimination at work-place.

6.1.1 Direct discrimination

Direct discrimination is when someone is treated less favorably than another person because of a protected characteristic mentioned in clause 5.1. Direct Discrimination is not justifiable.

Examples

- An employer refusing to hire someone based on their age
- A worker harasses another because of their race

6.1.2 Indirect Discrimination

Indirect discrimination is when you have a condition, rule, criterion, policy or practice that applies to everyone but particularly disadvantages people who share a characteristic mentioned in clause 5.1 and it cannot be shown to be a proportionate means of achieving a legitimate aim.

An Example

A policy of promotion that prioritizes on male employees is indirect discrimination on the basis of sex, as a greater proportion of workers are female.

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6.1.3 Occupational Requirement

Occupational requirement (previously known as genuine occupational requirement) in limited circumstances employers can directly discriminate against an individual for a reason related to any of the characteristics mentioned in clause 5.1 where there is an occupational requirement. The occupational requirement must be crucial to the post and be a proportionate means of achieving a legitimate aim. Decisions are made on a case by case basis. For example, refusing the job applications based on religions.

6.1.4 Associative Discrimination

Associative discrimination is where an individual is directly discriminated against for association with another individual who has a characteristic mentioned in clause 5.1. An example would be not promoting a staff member because they care for a person who had a stroke. This is a discrimination against the staff member because of their association with a disabled person or carer's responsibility.

6.1.5 Perspective Discrimination

Perspective discrimination is where an individual is directly discriminated against due to a perception by others that they have a characteristic listed in clause 5.1. It applies even if the individual does not actually possess that characteristic. An example would be if colleague A harass colleague B because they think colleague B has AIDS, even though they do not, in fact have the illness. Colleague A has made assumption and discrimination against colleague, based on a perception.

6.1.6 Discrimination Arising from Disability

Discrimination arising from disability is where an individual has been treated unfavorably because of something connected with their disability (so does not have to be the disability itself). During the recruitment process for the customer service department, an applicant with a hearing impairment was not selected due to the hearing challenges, despite being fully qualified and capable of performing the required duties with the support of assistive devices, such as hearing aids.

6.1.7 Discrimination on Recruitment & Promotion

Discrimination on recruitment and promotion is where an individual is directly or indirectly discriminated against based on i) the perception by others that they might have a particular characteristic mentioned in clause 5.1 ii) because of having have a particular characteristic mentioned in clause 5.1 in recruitment and promotion processes.

6.1.8 Discrimination on Career & Professional Development (Training)

Discrimination on career development and professional development including trainings is where an individual is directly or indirectly discriminated against based on i) the perception by others that they might have a particular protected Characteristic mentioned in clause 5.1 ii) because of having have a particular protected characteristic mentioned in Clause 5.1 in recruitment and promotion processes.

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6.1.9 Discrimination on Equal Pay

Discrimination on equal pay is where an individual is directly or indirectly discriminated against based on i) the perception by others that they might have a particular characteristic mentioned in clause 5.1 ii) because of having have a particular characteristic mentioned in clause 5.1, not only in remuneration but also other forms of monetary and non-monetary benefits or incentives throughout the employment duration of the organisation/company.

6.1.10 Neglecting Diversity & Inclusion

Diversity recognizes the unique characteristics that each employee brings to their work. Inclusion helps us build a workplace that promotes respect, fairness and equity for all. Diversity can take many forms: work background, experience, multiculturalism (including race, ethnicity and languages), gender identity, sexual orientation, family structure, age, physical abilities, education, thoughts / worldview, mental health, religious beliefs and political views. Each individual has unique qualities that they bring to the workplace and the wide range of perspectives that results from this diversity promotes business growth and success.

All employees including any types mentioned in clause 2.1 are required to provide an environment that is inclusive, supportive, respectful and welcoming and which accepts differences and values diversity.

6.2 What is not discrimination?

In certain circumstances, it will not be treated or regard as discrimination by Myanmar Awba Group in below act or practice:

- Is necessary to comply with other legislation;
- Is a genuine occupational requirement;
- Is necessary to protect health and safety;
- Is permitted because an exemption or 'special measure' applies;
- Is taken reasonable management practices because the employee cannot perform the inherent (essential) requirements of their job, including performance management, reasonable adjustments and disciplinary procedures;
- Is taken a direction to carry out reasonable duties and instructions; or
- Is taken a direction to comply with the company/organisation's policies, procedures or guidelines.

This is often referred to as 'positive discrimination' or 'affirmative action'.

6.3 Harassment

Harassment is unwelcome and unsolicited behaviour that a reasonable person would consider to be offensive, intimidating, humiliating or threatening.

It is unacceptable to harass an individual or group because of their characteristic mentioned in clause (5.1) outlined above. Harassment of any kind will not be tolerated at Myanmar Awba Group. Harassment that is not related to a characteristic mentioned in clause 5.1. is still inappropriate in the workplace and Myanmar Awba Group will deal with such incidents accordingly.

Harassment can be physical, spoken or written. It can include, but is not limited to:

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- Intimidation, verbal abuse, repeated threats or ridicule;
- Sending offensive messages by text, email or other means;
- Derogatory comments;
- Displaying offensive materials, pictures, comments or objects;
- Ridiculing someone because of their accent or English/Myanmar-speaking ability;
- Telling offensive jokes or making practical jokes based on a protected characteristic;
- Belittling or teasing someone based on a characteristic mentioned in clause (2.1); and
- Isolating, segregating or humiliating someone based on a protected characteristic.

6.3.1 Sexual harassment

Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient. Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal. Forms of conduct or behaviour which constitute sexual harassment include, but are not limited to:

6.3.1.1 Physical conduct

- Excessive or unwelcome familiarity or physical contact including patting, pinching, touching, brushing, stroking, kissing, hugging, fondling, or inappropriate touching up against someone;
- Physical violence, including sexual assault;
- The use of job-related threats or rewards to solicit sexual favors; and
- Behavior that may also be considered to be an offence under penal code, such as physical or sexual assault indecent exposure, stalking or obscene communications.

6.3.1.2 Verbal conduct

- Suggestive sexual comments, jokes, stories, conversations on an employee's appearance, age, private life, etc.
- Intrusive questions or comments about someone's private life;
- Repeated and unwanted social invitations for dates or physical intimacy;
- Insults based on the sex or other characteristics of the employee;
- Unwelcome flirting, requests for sex or repeated unwanted requests to go out on dates;
- Inappropriate or unwanted gifts; and

6.3.1.3 Non-verbal conduct

- Display of sexually explicit or suggestive material;
- Insults or taunts of a sexual nature or obscene gestures or sexually-suggestive gestures ;
- Whistling with intention of sexuality;
- Leering, staring or leering at a person or parts of their body;

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- Inappropriate advances on social networking sites;
- Accessing sexually explicit internet sites in the presence of others;
- Displaying or disseminating material such as posters, magazines or screen savers of a sexual nature;
- Making or sending sexually explicit messages (by phone or by email) or other online platforms;

6.3.1.4 Just because someone does not object to inappropriate behaviour in the workplace at the time, it does not mean that they are consenting to the behaviour.

Behaviour can still be considered to be sexual harassment even if:

- It is a one-off incident;
- The person engaging in the behaviour did not intend to humiliate, intimidate or offend;
- Other people in the workplace are not offended by the behaviour; or
- The behaviour was previously an accepted practice in the workplace.

6.3.1.5 Sexual harassment may be considered work-related even if it occurs outside of the workplace or outside of normal working hours, such as on tour, during work-related travel, or at an event night, after party/activities, industry event, promotional activity or conference. All workers have the same rights and responsibilities in relation to sexual harassment. All incidents of sexual harassment – no matter how big or small or who is involved – should be reported to the appointed Complaint Committee (refer to the Complaints Handling and Investigation Procedure/Flowchart) or relevant leadership or management position so that appropriate action can be taken.

6.4 What is not sexual harassment?

Where employees engage in consensual, welcome and reciprocated behaviour, this is not sexual harassment. However, appropriate professionalism is expected of all employees at all times, including in relation to employees engaging in consensual behaviour.

Anyone can be a victim of sexual harassment, regardless of their sex and of the sex of the harasser. Myanmar Awba Group recognizes that sexual harassment may also occur between people of the same sex. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

6.5 Workplace Bullying

Workplace bullying ('bullying') is where an individual or group of individuals repeatedly behave unreasonably to another person or group of persons at a workplace, which creates a risk to health and safety. It is unacceptable for an employee to engage in bullying, or encourage or allow another worker to do so. Bullying will not be tolerated at Myanmar Awba Group. Bullying does not need to be intentional to regard or take as bullying. Whilst one-off incidents of unreasonable behaviour may not be considered bullying, they are still inappropriate and may constitute discrimination or harassment.

Bullying can take many forms. It can be physical, spoken, written, overt or covert. Behaviours that may constitute bullying include, but are not limited to:

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- Physical intimidation or abuse;
- Aggressive or intimidating conduct or threatening gestures;
- Manipulation, intimidation or coercion;
- Threats, abuse, offensive language, shouting or belittling;
- Innuendo, sarcasm and other forms of demeaning language;
- Ganging up;
- Public humiliation or belittling;
- Initiation activities;
- Practical jokes, teasing, or ridicule;
- Isolation, exclusion or ignoring people;
- Inappropriate blaming;
- Inappropriate emails/pictures/text messages;
- Unreasonable accusations or undue unconstructive criticism;
- Allocating unpleasant, meaningless or impossible tasks;
- Placing unreasonably high work demands on selected workers;
- Deliberately withholding information, resources, support, supervision or consultation or equipment that a person needs to do their job or access their entitlements;
- Unreasonable refusal of requests for leave, training or other workplace benefits;
- Withholding access to opportunities;
- Deliberately changing hours of work for a person or group to inconvenience them; and
- Unreasonable timelines or constantly changing deadlines targeted at a specific person or group.

All employees in Myanmar Awba Group should behave in a manner that is professional, appropriate and does not constitute harassment or bullying.

6.6 What is not Workplace bullying?

Workplace bullying does not include reasonable management action carried out in a reasonable manner. Myanmar Awba Group has rights and obligations to effectively direct and control the way work is carried out. It is reasonable for managers and supervisors to allocate work to a worker and give fair and reasonable feedback on its workers' performance.

Examples of reasonable management action include, but are not limited to:

- Setting reasonable performance goals, standards and deadlines;
- Rostering and allocating working hours or assigned work where the requirements are reasonable;
- Transferring a worker for operational reasons;
- Deciding not to select a worker for promotion where a reasonable process is followed;
- Disciplinary action (including investigations) taken in a reasonable manner;
- Informing a worker about unsatisfactory work performance or inappropriate behaviour in an objective and confidential way;
- Implementing organisational changes or restructuring; and

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- Termination of employment.

Workplace conflict is generally not considered workplace bullying. Differences of opinion and disagreements in the workplace (e.g. differences of opinion on artistic interpretation or direction) may arise without engaging in repeated, unreasonable behaviour that creates a risk to health and safety. This is because not all conflicts or disagreements have a negative impact on health or safety, and it is common within a workplace that people will have differences of opinion. Low level, task-based differences of opinion can benefit the organisation and employees, as it may generate debate leading to new ideas and innovation, provided all workers behave in an appropriate manner.

6.7 Victimization

Victimization involves treating or threatening someone unfairly or badly or in a detrimental way, because they have made, or intend to make a complaint or helped someone else make a complaint, or refused to do or raised a grievance or suspect they are doing so a discrimination/harassment/sexual harassment, bullying complaint. This also includes those who have supported another person in making a complaint.

It is also victimisation to threaten someone (such as a witness) who may be involved in an investigation of a complaint. It is unacceptable to victimise another person. Victimisation will not be tolerated at Myanmar Awba Group. Victimisation is a very serious breach of this policy and is likely (depending on the severity and circumstances) to result in formal disciplinary action against the perpetrator. The perpetrator may also be subject to legal proceedings under penal code of The Republic of The Union of Myanmar.

6.8 Vilification/Criticism

Vilification/Criticism is any public act that incites hatred, serious contempt, or severe ridicule against another person or group of people due to their race (including ethno-religious origin), homosexuality, transgender status and HIV/AIDS status. Vilification will not be tolerated at Myanmar Awba Group.

6.9 Gossip and confidentiality

All employees must avoid gossiping about historical matters involving current or former workers or any allegations of inappropriate workplace behaviour occurring at Myanmar Awba Group. Where an employee considers a person's behaviour to be inappropriate, the worker should raise this with the relevant leadership or management person, or report the behaviour to the Complaints Committee so that appropriate action can be taken.

It is also unacceptable for employees at Myanmar Awba Group to talk with other workers, clients or suppliers, extended family or friends, or the media about any complaint of discrimination, harassment, sexual harassment or bullying that is the subject of a current complaint or investigation other than on a 'need to know' basis. Breaching the confidentiality of

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a current complaint or investigation or inappropriately disclosing personal information obtained in the course of a complaint or investigation (for example, as a manager) is a serious breach of this policy and may lead to formal disciplinary action.

Those directly involved in a complaint (i.e. complainant and respondent) are entitled to seek personal and professional support, and seeking of such support (for example, from someone who has knowledge of the complaint) is not considered a breach of confidentiality.

7. EMPLOYEE'S RIGHT AND RESPONSIBILITIES

7.1 All employees are entitled to:

- Enjoy a workplace free from discrimination, harassment, sexual harassment and bullying;
- The right to raise issues or to make an enquiry or complaint in a reasonable and respectful manner without being victimised;
- Request to have a support person (e.g. a co-worker, friend or family member) present during the complaints process;
- Reasonable flexibility in working arrangements, especially where needed to accommodate family responsibilities, disability, religious beliefs or culture; and
- Have recruitment and selection decisions based on merit and not affected by irrelevant personal characteristics.

All employees must:

- Strictly comply with the standards of behaviour outlined in this policy, the Code of Conduct and other related policies;
- Treat everyone with dignity, courtesy and respect at all times;
- Where appropriate, offer support to people who experience discrimination, harassment, sexual harassment and bullying, such as providing information about how to make a complaint;
- Avoid gossip about historical matters or matters that are subject of a current complaint or investigation;
- Respect the confidentiality of complaint resolution procedures;
- Where applicable, assist and cooperate in the investigation of complaints made under this policy;
- Participate in training provided by Myanma Awba Group around workplace discrimination, harassment, sexual harassment and bullying; and
- Take bystander action (if safe to do so) if they see or hear about discrimination, harassment, sexual harassment or bullying in the workplace

8. ROLES AND RESPONSIBILITIES OF LEADERSHIP AND MANAGEMENT POSITION

8.1 Preventing from any forms of discrimination, harassment, sexual harassment and bullying is central to our work and each of us have a responsibility for taking action. In addition to the responsibilities of employees, personnel in leadership and management positions must also:

- Model appropriate standards of behaviour;
- Take steps to educate and make employees aware of their obligations under this policy, the Code of Conduct

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and other related policies, and the relevant penal codes and law;

- Treat all workplace incidents seriously and take immediate action where a complaint is made;
- Act fairly to resolve issues and enforce workplace behavioural standards, making sure relevant parties are heard;
- Where appropriate, help employees resolve complaints informally;
- Refer formal complaints about breaches of this policy to the appropriate Complaints Person for investigation;
- Use their best endeavours to prevent employees who raise an issue or make a complaint from being victimised and taking steps to address the issue where it occurs;
- Provide employees (including bystanders) with information about the support available to them;
- Not ask discriminatory questions or request information during a recruitment process, unless it is directly relevant to a genuine requirement of the position; and
- Reasonably consider requests for flexible working arrangements.

8.2 Furthermore, personnel in senior leadership positions (e.g. CEOs, directors, team leaders, senior manager, specialists, managers, human resource managers, board members) must also:

- Monitor the effectiveness of this policy, the Code of Conduct and other related policies;
- Review and update the information within the policy, the Code of Conduct and other related policies so that it remains relevant;
- Provide training or guidance to workers regarding discrimination, harassment, sexual harassment and bullying and how to make a complaint or take bystander action;
- Provide training or guidance to all employees on this policy, the Code of Conduct, the complaints process and other related policies and mechanisms to support employees to make a complaint or take bystander action; and
- Promote this policy, the Code of Conduct and other related policies throughout Myanma Awba Group;
- Embed equality and avoid any forms of harassment in all aspects of employment, including but not limited to recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.
- Make recruitment and job selection decisions based on merit – that is, the skills and abilities of the candidate as measured against the inherent requirements of the position – regardless of personal characteristics;
- Screen new policies, initiatives, programmes for their potential impact on equality- to meet the needs of people from the group mentioned in clause 5.1.
- Prohibit retaliation based on a protected activity, such as the filing of a complaint of discrimination or participation in the investigation of such a claim. Any witness, complainant or respondent involved in an investigation ought not to be retaliated against for their participation in the process.
- All reported complaints must be addressed promptly, seriously, and with sensitive manners.

Respective senior officers have a proactive responsibility to prevent all forms of workplace discrimination, harassment and bullying. They are obligated to take appropriate action upon becoming aware of discriminatory incidents or circumstances where such incidents are likely to arise, even there is no formal complaints from employees.

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9. GENERAL RESPONSIBILITIES

All employees and stakeholders of Myanmar Awba Group are responsible for following this policy to create an environment free from any forms of harassment. Myanmar Awba Group expects all employees to avoid any behaviour or conduct that could reasonably be interpreted as harassment, discrimination and sexual harassment as defined under this policy.

Any employee has the right to raise concerns or make a complaint regarding harassment under this policy without fear of retaliation. Any person found in violation of this policy is subject to disciplinary action up to and including termination of employment.

10. SUPPORTING BYSTANDER ACTION

In order to promote a safe, equitable and respectful workplace, Myanmar Awba Group encourages all employees to take appropriate action (in accordance with this policy) if they witness or hear about workplace discrimination, harassment, sexual harassment and bullying.

- **See:** Know where the line is. If you see or hear something that makes you feel uncomfortable, don't ignore it.
- **Talk:** It takes courage to speak up. Talk with your boss, your colleagues or with the person who is crossing the line.
- **Support:** Don't underestimate the power of support. It can help a colleague stand up and take action.

Victimisation of someone taking bystander action will not be tolerated by Myanmar Awba Group.

11. BREACH OF THE POLICY

A breach of this policy will result in disciplinary action. Depending upon the severity of the case, consequences may include apology, counselling, transfer, demotion, dismissal, or other forms of disciplinary action deemed appropriate.

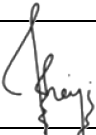
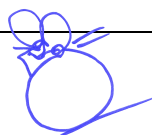
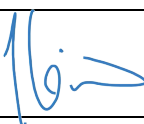
12. POLICY MANAGEMENT

This policy takes effects from the date of approval by the CEO/Managing Director/Chairperson or Top Management of the company/organisation.

Amendments or developments will be recommended to the board from time to time as deemed appropriate. Formal review will take place before the expiry of (two) years from the anniversary date of approval. Recommendations for change will require board consideration and if necessary, approval.

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DATE: 17-June-2026		DATE: 17-June-2026

Policy Document History

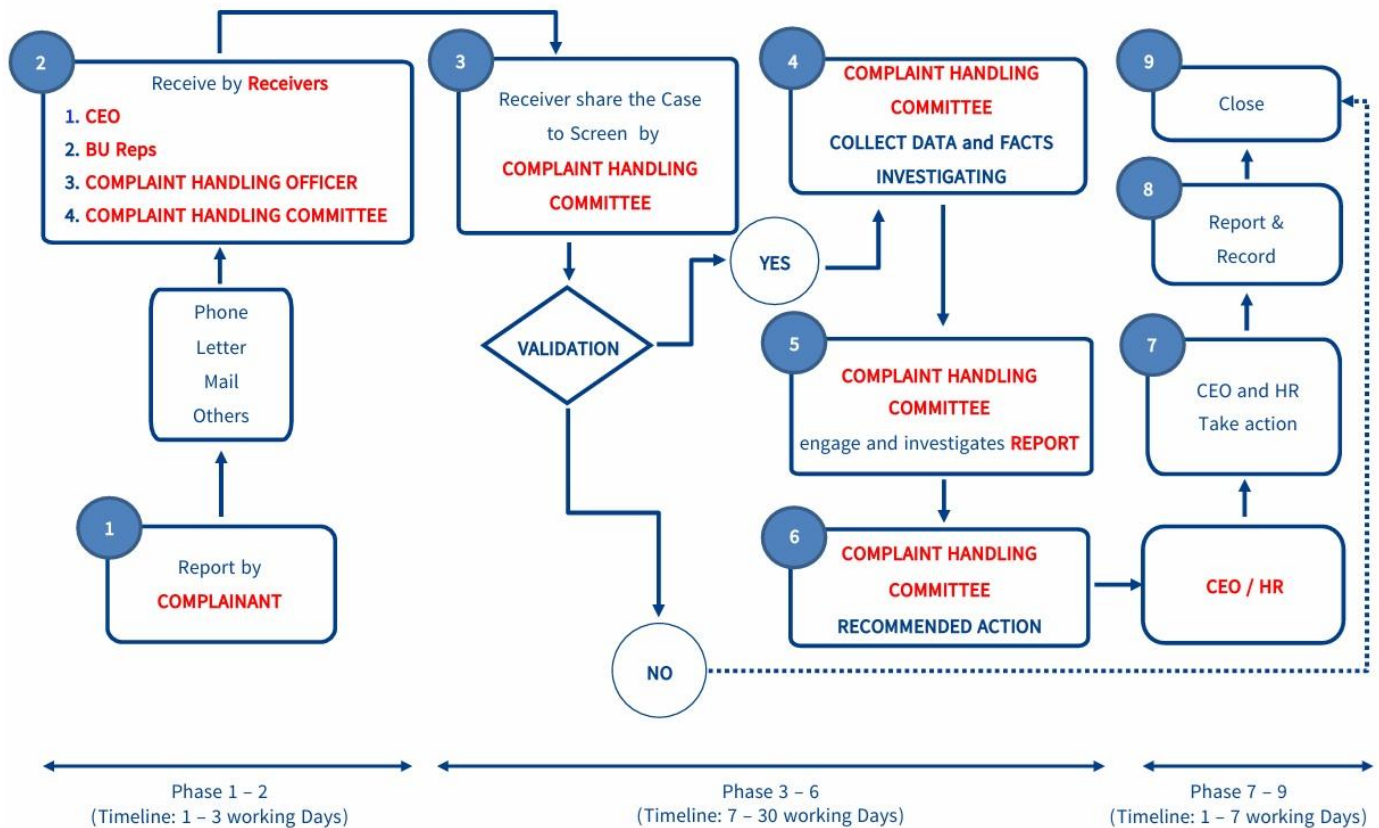
Version No.	Date		Author(s)		Approver (s)		Date reissued to previous recipients	Brief of Changes
	Issued	Reviewed	Name	Designation	Name	Designation		

Annex – 1

Myanma Awba Group Co., Ltd.

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Process Flow Diagram : Complaint Handling Mechanism



This mechanism provides a clear and structured way to address complaints within the organization, including serious issues such as harassment. It ensures complaints are managed fairly, promptly, and confidentially by a multidisciplinary internal body.

Members of Complaint Handling Committee

Parties Involved – Complaint Handling Committee (CHC):

1. Group Chief Sustainability Officer
2. Group Legal Head
3. Group HR Head
4. Group Internal Audit Head
5. Group CEO (Optional, depending on case severity or conflict of interest)

Step-by-Step Process

Phase 1 – 2: Receiving and Screening (1–3 Working Days)

1. Complaint Submission

Complaints can be submitted to Group HR department via phone, email (complaints@awba-group.com), letter, or in person to:

- CEO of Business Units
- Assigned Representative from each Business Unit

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- Complaint Handling Officer

- Any member of the CHC

Complaints should be included as minimum:

1. The complainant's name, position, department, business unit
2. The details statement of complaint (when, where, how, etc.)
3. Who is the complainant complaining against (name, position, department, business unit)
4. Evidence/Witness (if available)

2. Initial Screening

The receiver shares the complaint with the CHC. The committee screens and validates whether it falls under misconduct, policy breach, or harassment/discrimination/bullying.

Phase 3 – 6: Investigation (7–30 Working Days)

3. Validation

If the complaint is invalid or unfounded, the case is closed. If valid, the CHC proceeds with an investigation.

4. Investigation & Evidence Gathering

The CHC collaborates to collect relevant facts:

- Interviewing complainant, alleged party and witnesses
- Reviewing records (emails, CCTV, messages)
- Gathering witness statements including the interviews with the witness(es)

5. Internal Deliberation & Analysis

Members of CHC (e.g., Legal for compliance, HR for policy, Sustainability for ethics, Internal Audit for impartiality) review the facts independently and collectively.

6. Recommendation of Action

CHC consolidates findings and submits a joint report to the CEO and HR with clear action recommendations which includes making the decision on whether the respondent (alleged harasser) engaged in inappropriate action.

Phase 7 – 9: Action and Closure (1–7 Working Days)

7. CEO / HR Decision

Based on CHC's recommendation, disciplinary or corrective actions are taken (e.g., warnings, training, reassignments).

8. Reporting and Record Keeping

A formal report is created and securely filed by Group HR and Internal Audit for compliance.

9. Closure & Communication

The complaint process is closed. Outcomes are communicated to the complainant, respondent and relevant parties, ensuring confidentiality.

Employees who are directly involved in a complaint or an accompanying investigation (whether as a complainant, respondent, witnesses or support person) and all the responsible persons to resolve the complaint must maintain confidentiality to the maximum extent possible throughout the process.

Sample Case: Anti-Harassment Complaint in Factory Admin Department

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Background

A female administrative assistant from Factory A reports that her department supervisor has made repeated inappropriate remarks and jokes with sexual undertones. She feels unsafe and seeks immediate redress.

Case Flow

1. Report Received

The complaint is emailed to the Complaint Handling Officer and shared with CHC.

2. Screening & Validation (CHC)

CHC validates that this qualifies as a potential harassment case and launches an investigation.

3. Investigation (CHC Roles):

- Group HR collects initial statements and interviews.
- Legal Head reviews potential breaches of policy and national labor laws.
- Internal Audit ensures neutrality.
- Chief Sustainability Officer ensures process aligns with ethical and human rights standards.
- CEO is consulted due to seriousness of allegation.

4. Findings

Witnesses confirm inappropriate behavior. Chat logs support the complainant's claims. No physical harassment, but verbal misconduct proven.

5. CHC Recommendation

Formal written warning to supervisor, mandatory anti-harassment and ethics training, optional team reassignment for complainant, and an apology facilitated through HR (if complainant agrees).

6. Management Action

Specific BU 's CEO and BU's HR implement CHC recommendation. Monitoring mechanism added for repeat offenses.

7. Closure

Report documented and stored by Internal Audit. Case closed and resolution shared with complainant confidentially.

Core Values Ensured Throughout the Process:

Zero Tolerance for Harassment

Confidentiality and Non-Retaliation

Prompt Resolution and Transparency

Legal and Ethical Integrity

Psychological Safety of the Complainant

Remark: The organisation can use the informal procedure when issues are -

- Voluntary & Complainant-Led – The informal process is only considered when the complainant requests it, ensuring comfort and safety in raising issues.
- Early Resolution Approach – Focuses on addressing less severe concerns through open discussion, mediation, or intervention by the immediate manager.

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- **Confidential & Supportive** – A designated HR officer receives complaints, with alternative contacts available if conflicts of interest arise.

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