

Code of Conduct

General

The Yoma Group has adopted a Code of Conduct (“the Code”) that applies to all employees. The Code sets out the principles to guide employees in carrying out their duties and responsibilities to the highest standards of personal and corporate integrity when dealing with the Yoma Group, its competitors, customers, suppliers, other employees and the community.

The Code sets the minimum standard that the Yoma Group expects of all employees, regardless of the jurisdiction or legal entity through which the Yoma Group operates. Where appropriate, the Code can be supplemented by additional specific requirements related to a country, entity or business unit.

It is the responsibility of every employee to comply with the spirit and principles of the Code, as amended from time to time.

Compliance with the Law

In addition to the Code, the Yoma Group expects employees to comply with all laws, regulations and legal requirements applicable to the different jurisdictions where it operates.

UN Global Impact

The Yoma Group, through our Group of Companies have been signatories to the UN Global Compact and its 10 principles since 2012. The ten principles are listed below and apply to all group businesses and staff. More information can be found at , <https://www.unglobalcompact.org/what-is-gc/mission/principles>

In becoming a signatory to the Global Compact, we express our intent to advance those principles within our sphere of influence. We are committed to making the Global Compact and its principles part of the strategy, culture and day to day operations of our company, and to engage in collaborative projects which advance the broader goals of the United Nations, particularly the Millennium Development Goals, Yoma

Strategic Holdings Ltd. will make a clear statement of this commitment to our stakeholders and the general public.

The Ten Principles of the United Nations Global Compact:

Human Rights

Principle 1 : Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2 : Make sure that they are not complicit in human rights abuses.

Labour

Principle 3 : Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4 : The elimination of all forms of forced and compulsory labour;

Principle 5 : The effective abolition of child labour; and

Principle 6 : The elimination of discrimination in respect of employment and occupation.

Environment

Principle 7 : Businesses should support a precautionary approach to environmental challenges;

Principle 8 : Undertake initiatives to promote greater environmental responsibility; and

Principle 9 : Encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle 10 : Businesses should work against corruption in all its forms, including extortion and bribery

Workplace Health and Safety

The Yoma Group is committed to provide a healthy and safe work environment for employees, customers, business partners and visitors. Every employee has a personal responsibility to support this commitment.

Employees are obliged to carry out their work in a safe manner, without causing harm to themselves or others, and to report any potentially unsafe or unhealthy situations immediately, including near miss events.

They must observe and follow all safety and environmental regulations laid down in the operation instructions, including putting on the necessary safety equipment, where applicable.

This commitment is shared with employees, customers, business partners, visitors, contractors, suppliers and related third parties.

Group Property and Assets

Employees are responsible for property of the Yoma Group that may be entrusted to them. This property includes, but is not limited to physical property (such as phones, Yoma Group vehicles or computers), records (such as data on customers and Yoma Group records), and intangible property (such as computer software and computer records). It is important that, whichever category the property falls into, employees must treat the Yoma Group's property as they would their own and must not damage it, deface it or remove it for personal use, unless authorized to do so.

Similarly, they are responsible for the proper expenditure of the Yoma Group's funds including expenses. While spending or committing Yoma Group funds, employees must be sure that the transaction is properly documented, and that the Yoma Group receives appropriate value in return.

Job Performance

The Yoma Group is committed to providing quality and efficient service to all customers, and every employee has an important role to play. They are required to perform tasks assigned in a responsible and reliable manner and to manage time at work efficiently, without wasting Yoma Group time and resources

by taking part in unauthorized activities including, but not limited, to trading, gambling or political activities on the premises.

Dealing with other Employees

At all times, every employee has a responsibility to treat colleagues with respect and consideration. Improper behavior includes, but is not limited to, discrimination or harassment in any form such as bullying, intimidation, threats, ridicule, sexual, racial or verbal abuse, insults, gestures, willful or serious insubordination, physical violence etc. The Yoma Group will not tolerate these behaviors and will take disciplinary action including termination or dismissal.

While on duty, employees must not conduct themselves in such a manner that will interfere with or prevent other employees from carrying out their duties properly.

Equal Employment Opportunity

The Yoma Group aims to be an equal opportunity employer that does not unlawfully discriminate against employees on the basis of an individual's race, ethnicity, religion, creed, gender, national origin, age, disability, marital status, sexual orientation or any other status protected by applicable law. This policy applies to all terms, conditions and privileges of employment, including recruitment, hiring, placement, compensation, promotion, discipline and termination. The Yoma Group seeks to provide equal pay for equal work.

In accordance with this policy the Group treats civil partnerships to have the same status as legal marriages. For these partnerships there is often no official documentation, so to clarify the Group regards these as permanent in intent. Any abuse of this to claim benefits to which an employee is not entitled will be regarded as fraud.

Customers and Business Partners

Honesty in all dealings with the Government, businesses and other organizations is essential. Making of payments or payments in kind such as gifts or favors to influence individuals to award business opportunities to the Yoma Group or to make a business decision in the Yoma Group's favor is prohibited.

Employees must always seek any third party's confidential information through the proper authorities. If given such confidential information, employees must ensure that they are entitled to have it, and obey the rules of having such information, if any.

They must always maintain good relationships with customers which is vital to the success of the business. Customers must feel that they are getting the highest standard of service from a company which listens to them and is responsive to their needs.

Information about customers and business partners must remain confidential and should only be imparted with full authority to do so.

Alcohol and Drugs

Drugs and/or alcohol can impair an individual's capacity to perform his/her job safely, efficiently and with respect for colleagues and customers. The use of such substances may result in injury or a threat to the well-being of an individual, colleagues, customers or members of the public.

An employee must attend work in a fit state and must not to be under the influence of alcohol or drugs during working hours.

Involvement with the manufacture, possession, use, distribution, sale, purchase, or transfer of illegal drugs is strictly prohibited.

Official Records

Information is a valuable asset of the Yoma Group and its integrity depends on the honesty, completeness and accuracy of its records. This means that anyone preparing the Group's records and reports must be diligent in assuring the accuracy and completeness of all data, records, reports and expenditure connected with the Group.

Employees must keep copies of the Yoma Group records such as installation data, customer records and test data at a safe location. For financial record keeping purposes, employees must not engage in any practice or procedure which might conceal, facilitate or constitute bribery, kickbacks, improper gratuities or other illegal or improper payments or receipts, or which might appear as such.

Proprietary Information and Intellectual Property

Many employees have access to information, which includes the trade secrets, know-how used by the Yoma Group to distinguish its businesses and services from those of competitors, as well as sensitive private business information of a commercial, technical or financial nature such as prospects, agreements with customers, business partners, competitors, account plans, business proposals, negotiations and contracts.

It is important that all Group proprietary information is kept confidential. Employees have a duty to safeguard the Yoma Group information, bearing in mind ethical, legal ramifications and government regulations. Information of commercial value or of a sensitive nature must be tightly controlled. For example, when releasing information to a third party for a bid proposal, a Non-Disclosure Agreement (format provided by legal department) should be signed by the third parties, and information released is on a need-to-know basis.

Any trademark, copyrights, patents, designs, registered designs, proprietary information and all other intellectual property rights developed and commissioned by the Yoma Group belong to the Yoma Group. Employees are reminded not to infringe any third parties' rights including, but not limited to, any third party intellectual property rights, copyrights, patents and trademarks.

The Yoma Group will hold exclusive property of any invention, discovery, design or improvements made. This could also include inventions employees may create which relate to the Group's business, regardless of whether the invention or designs are patentable or are capable of being registered or copyrighted.

Employees must report these inventions to the Yoma Group and shall, at the Yoma Group's request and expense, disclose information relating to the invention and do what is required to obtain patents or industrial rights relating to the invention. The patents will be in the name of the Yoma Group or its nominee and the employee will not be entitled to any payment for the invention. The Yoma Group's ownership of any intellectual property created by employees while with the Group continues after they have left service.

When employees leave the Yoma Group for any reason, including retirement, they must return all the Group's property, including all documents and records in their possession; they must not disclose or misuse Yoma Group's confidential information. Employees are also responsible for protecting information provided in confidence by any third party, such as a customer, supplier or a partner, after they leave the Yoma Group.

Conflict of Interest

A 'conflict of interest' arises when employees have a competing professional or personal interest that would either make it difficult to fulfill their duties properly, or would create an appearance of impropriety that could undermine customer or public confidence.

Employees must do nothing that conflicts with the interests of the Yoma Group, or anything that could be construed as being in conflict, for example, participating in the evaluation/approval of award to a vendor in which an employee has a vested interest (either personally, or through close relatives). Employees should declare/disqualify themselves from handling transactions which put them, whether perceived or real, in a position of conflict.

Employees must avoid all situations which could result in conflicts of interest. They should comply with reporting and disclosure requirements of potential or actual conflicts of interest, and disclose any matters which could reasonably be expected to interfere with their professional duties.

Business Dealings

Employees should not engage in any outside business dealings that involve or could appear to involve, a conflict between their personal interests and the interests of the Yoma Group (i.e. conflict of interests).

Employees must not have any direct or indirect financial or business interest in or dealings with competitors, suppliers, customers or anyone else with whom they are engaged in a business relationship on behalf of the Yoma Group, which might or might appear to, create a conflict of interest, or impair the judgments they make on behalf of the Yoma Group.

They should also not engage in any personal business dealings which detract from or conflict with their employment in the Yoma Group.

Employees must avoid situations where their loyalties may be divided between the Group's interest and those of a customer, supplier or competitor.

Employees must not take advantage of any opportunity for personal gain that rightfully belongs to the Yoma Group. They should avoid putting themselves in any situation which might, or might appear to put them at a personal advantage, and they must report any potentially compromising situation to their supervisors promptly.

Employment outside the Yoma Group

Employees should not engage in any outside employment or hold any position without the prior written consent of Human Resources unless such employment has been arranged or is undertaken in connection with the performance of their responsibilities and duties as part of the enlarged Yoma Group.

If employees are considering accepting an external appointment, they must consider if accepting this position may give rise to the possibility of conflict. If they have been given permission to take on such employment or to have other business relationships, they must ensure that these activities do not negatively affect their ability to fully and effectively perform their role for the group or reputation and/or its services to customers or the Yoma Group's current or future business plans.

Insider Trading

Employees must not use "inside" information - information which has not been made available to the public and which may materially affect a corporation's stock price - as the basis for purchasing, or selling, shares in the listed entities in the Yoma Group, or any other company with which they have dealings. Such information may include unannounced earnings, dividends or potential acquisitions. Employees must not engage in, or procure another person to engage in, any share transactions with respect to the shares of the corporation, whether it is for themselves, anyone else or for the Yoma Group, when in possession of inside information.

Gifts and Hospitality

The acceptance of gifts from customers, existing and/or potential, business partners, suppliers, contractors, competitors or members of the public is prohibited as it may create a situation of conflict or potential conflict of interest.

Retention of Gift

Gifts not exceeding 100,000 kyats (or equivalent in a foreign currency) can be retained by the employee. All gifts exceeding 100,000 kyats must be recorded in a registry maintained by the relevant business head detailing the description of the gift, the name of the person providing the gift and the manner in which such gift was disposed of. Gifts exceeding 100,000 kyats can be retained by the employee if it has been declared to and approved by the relevant business head. It should be noted that retention of gifts is allowed only if they are received under non-obligatory circumstances.

As business lunches/dinners are an accepted mode of hospitality, these need not be declared but care must be exercised while accepting such meals. These should be infrequent. The sole purpose must be for enhancement of a business relationship and not for reciprocity.

Dealing with the Media

It is important that news about all Yoma Group activities – from new partnerships to new services – be properly coordinated. All media requests for information and interviews should be referred to Group Communication and Investor Relations Division in Singapore and Yangon.

Statements made in any online forum (e.g. web logs or blogs) or social networking sites (e.g. Facebook) are considered to be public statements. No comments regarding the Yoma Group, its business, products, services, strategy or practices as well as employee should be made without prior approval from Management. Where employees do participate in blogs or any other online space, even personal sites maintained outside of work hours, they should take care to ensure not to in conflict with the best interests of the Yoma Group.

Fraud

Where an employee has concerns, or receives information about any fraud in connection with the affairs of the Yoma Group, it is the employee's responsibility to report those concerns or information.

The Yoma Group adopts a "zero tolerance" approach to fraud and has implemented a formal policy, the Whistleblower Protection Policy which sets out the procedures for reporting and investigating fraud in connection with the business and affairs of the Yoma Group.

Penalties

Breaches of this Code could result in disciplinary action up to and including termination, as well as compensation for damage caused

Employee Social Media Policy

Social media is a place where people exchange information, opinions and experiences to learn, develop and have fun. The Yoma Group's Social Media Policy provides a framework for using social media.

This Policy provides employees with clear guidelines on the acceptable use of social media and practical advice to avoid issues that might arise by careless use of social media in the workplace and private space.

"Social media" refers to all types of social media platforms and communication tools that exist and provides for the sharing of information to user groups or the public at large. Online communications may include posting or publishing information via social media applications, uploading and/or sharing tweets, photos, images or videos, direct messaging, status updates or any other form of interaction and/or communication facilitated by social media.

The tools include, but are not limited to, the following:

- Social networks such as Facebook, Instagram, TikTok and Twitter;
- Blogs including corporate blogs and personal blogs, and blogs hosted by media outlets;
- Online forums, discussion boards, podcasts and groups;
- User generated media sites such as YouTube and Snapchat.

Note that an employees' behavior reflects the Group even when the employee is not speaking on the company's behalf and/or what they post and share on their personal social media.

How a Yoma Group employee should behave when participating in social media is covered in detail below and all employees are required to understand and adhere to this Policy. The company may monitor postings and review for compliance with the Group's policies. Any breach of company policies may result in disciplinary actions being taken and may include termination.

Employees are advised to:

Before they post, ask if the post would embarrass themselves or other people or harm the reputation of the company. Keep in mind the impact their comments may have on others and the Group.

Use appropriate language. It should be polite and respectful, and no vulgar, coarse language or swear words should be used at all times.

Do not post or upload anything defamatory, threatening, harmful, sexually or racially offensive and obscene, disparaging, vulgar or otherwise objectionable. Avoid posting any material that:

- constitutes harassment, hate speech, or libel;
- violates the privacy rights of fellow employees; or
- is disruptive to the work environment because it impairs workplace discipline or control, impairs or erodes working relationships, creates dispute or strong disagreement among co-workers, interferes with job performance, or obstructs operations.

Do not bully, harass, humiliate, abuse, impersonate or intimidate others. Avoid any defamatory, offensive or derogatory content. It may be considered as a violation of our company's anti-harassment policy, if directed towards colleagues, clients or partners.

Do not post photos and videos that could negatively affect any employee, their job, their co-workers or the company.

Do not misrepresent themselves or their role in the Group. Ensure others know that their personal account or statements do not represent our company by stating that it is their opinion. Employees should not state or imply that their personal opinions and content are authorized or endorsed by the company. We advise using a disclaimer such as "opinions are my own" to avoid misunderstandings.

Be mindful of privacy: Safety is our No. 1 priority. Do not give out any personal information about themselves or anyone else (eg. home address, telephone numbers or any confidential information.)

Confidentiality policies and laws always apply. Do not share intellectual property such as trademarks on a personal account without approval.

The Yoma Connect and Workplace platforms are set up for internal communication purposes. Do not share content posted on this platform unless the employee has received permission from the person who posted or from HR.

If employees neglect their job duties to spend time on social media, their decline in productivity will show on their performance reviews. Whether employees are handling a corporate account or use one of their own, they should remain productive. The Yoma Group will differentiate between an employee's use of personal social media at work and the use of corporate accounts as may be required in the performance of the duties.

Employees representing our company :

Some employees represent our company by handling corporate social media accounts or speak on our company's behalf. We expect all employees to act carefully and responsibly to protect our company's image and reputation.

Employees should:

Be respectful, polite and patient when engaging in conversations on our company's behalf. Be extra careful when making declarations or promises towards customers and stakeholders.

Avoid speaking on matters outside their field of expertise when possible. Everyone should be careful not to answer questions or make statements that fall under somebody else's responsibility.

Follow our confidentiality policy and data protection policy and observe laws on copyright, trademarks, plagiarism and fair use.

Do not use company logos without approval from Group Communications or relevant Marketing and Communications team.

Inform Group Communications or relevant Marketing department when employees are about to share any major-impact content.

Avoid deleting or ignoring comments for no reason. They should listen and reply to criticism.

Never post discriminatory, offensive or libellous content and commentary.

Correct or remove any misleading or false content as quickly as possible.

Disciplinary Consequences

The Yoma Group will monitor all social media postings on its corporate account.

Disciplinary action may be taken if employees do not follow this policy's guidelines. Examples of non-conformity with the employee social media policy include but are not limited to:

- Disregarding job responsibilities and deadlines to use social media.
- Disclosing confidential information through personal or corporate accounts.
- Directing offensive comments (defamatory, threatening, harmful, sexually or racially offensive and obscene, disparaging, vulgar or otherwise objectionable) towards other members of the online community.

Yoma Group reserves the right to direct an employee to immediately and permanently remove content published on any Social Media channel if the content is in breach of this policy or if it is deemed inappropriate.

An employee's responsibilities are not only to comply and act in an appropriate fashion but to also report inappropriate posts and behaviour they may observe on social media platforms.

Every employee owns the consequences of their actions. Disciplinary action may be taken not just for posts on the corporate account, but more generally for actions that do not reflect the company's mission and values.

Employee Confidentiality Policy

Disclosure of Official Documents, Information and Trade Secrets

All documents, papers and information acquired in an employee's official capacity or otherwise should be treated as confidential and trade secrets of the Yoma Group. Employees must not copy, reproduce, extract, translate or in any way deal with them in a manner that is not authorized or allow others to do so, or disclose, publish or communicate them to the Press or to individuals whether directly or indirectly unless it is in the course of their official duties or if it is lawfully required or authorized by any Court of law or with authorization from the Management. This clause shall continue to apply even after they are no longer employed by the Yoma Group. This policy affects all employees, including board members, investors, contractors and volunteers, who may have access to confidential information. Confidential and proprietary information is secret, valuable, expensive and/or easily replicated. Common examples of confidential information are:

- Unpublished financial information
- Data of Customers/Partners/Vendors
- Patents, formulas or new technologies
- Customer lists (existing and prospective)
- Data entrusted to our company by external parties
- Pricing/marketing and other undisclosed strategies
- Documents and processes explicitly marked as confidential
- Unpublished goals, forecasts and initiatives marked as confidential
- Employees may have various levels of authorized access to confidential information.

What employees should do:

- Lock or secure confidential information at all times
- Shred confidential documents when they're no longer needed
- Make sure they only view confidential information on secure devices
- Only disclose information to other employees when it's necessary and authorized
- Keep confidential documents within the Yoma Group's premises unless it's absolutely necessary to move them

What employees shouldn't do:

- Use confidential information for any personal benefit or profit

- Disclose confidential information to anyone outside of our company

Replicate confidential documents within the Yoma Group's and files and store them on insecure devices
Upon termination or expiry of the employee's employment with the Yoma Group, employees are obliged to return any confidential files and delete them from their personal devices.

Confidentiality Measures

The Yoma Group takes measures to ensure that confidential information is well protected, including but not limited to:

- Storing and locking paper documents
- Encrypting electronic information and safeguarding databases
- Requiring employees to sign non-compete and/or non-disclosure agreements (NDAs)
- Requesting for authorization by senior management to allow employees to access certain confidential information
- Exceptions
- Confidential information may occasionally have to be disclosed for legitimate reasons. Examples are:
If a regulatory body requests it as part of an investigation or audit
- If our company examines a venture or partnership that requires disclosing some information (within legal boundaries)
- In such cases, employees involved should document their disclosure procedure and collect all needed authorizations, and should not disclose more information than required.

Disciplinary Consequences

Every breach of the confidentiality policy will be investigated. Employees who do not comply with the confidentiality policy will face disciplinary and possibly, legal action. In the event that any employee willfully or regularly breaches the confidentiality policies for personal benefit, the Yoma Group reserve the right to terminate the employment of such employee immediately. This policy is binding even after termination or expiry separation of employment.