

## **Company policy on Anti-Bribery and corruption**

### **Purpose**

Integrity is our value and the foundation of **SHWE EIN MACHINERY LIMITED (SEM)** corporate strategy built upon our Code of Conduct. We encourage all employees to follow and live by the code.

### **Policy**

It is our policy to conduct all of our business in honest and ethical manner.

We take a zero tolerance approach to bribery and corruption. We will abide by all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate.

### **Applicability**

All Company employees

### **Procedure**

Every employees shall promptly report to his/her superior or to the MD or to the Board of Directors any actual or possible violation of this Code, in an event he or she becomes aware of any breach of this policy or any event that could affect the reputation of the Company.

### **Training to employees**

To provide anti-bribery and corruption compliance training to new employees at the time of orientation and annual refresher training to all employees.

Company may select an individual employees or a group of employees to attend that training based on job function and assessed risks.

### **Governance**

Consistent review by management.

Annual compliance risk assessments to be conducted by Compliance Department.

Annual audits of key dealership operations by Compliance Department.

Date : 01 March 2012

Revise Date : 01 September 2025

Approved by : Managing Director

