



http://www.concordiamyanmar.com
FB : Concordia Int Ltd, Myanmar
Co REG No : 177703591
Former REG No : 690/4993-1994

Concordia International Co.,Ltd

YGN : Bld (11), MICT park, Tel : 01-654 950 ~ 8, Fax : (951) 654 959, concordia@concordia.com.mm
MDY : Block (1), Rm-8, Mingalar Mdy Housing Comp, 73 Street, Chanmyatharsi Tsp,
Ph : 09-91001983, mdy@concordia.com.mm
NPT : No.144, Shopping Complex (Thiriyadanar) Nay Pyi Taw, Ph : 067-420 819, 421 362
npt@concordia.com.mm
TGI : No. (Nya-38), Hnin Si Road, U Gyi Kham Quarter, Taung Gyi.
Ph : 09-444 406 318, taungyi@concordia.com.mm
Magwe : No-67D, Kan Thar Quarter, BHSH (1) Road, West of Aye Zayti Pagoda, Makyeeepin Street, Magwe.
Ph : 09-785 550 820, magwe@concordia.com.mm



HUMAN RIGHTS & LABOUR STANDARDS POLICY STATEMENT

A. Introduction

This statement reflects the underlying Human Rights & Labor Standards Policy approved and published internally on 20 September 2021.

Concordia Int'l Ltd(Concordia) is committed to conducting its business with the highest level of integrity in all aspects of our operations and consistent with local regulations.

The principles and guidelines set out the Policy are derived from the United Nations Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work and The Ten Principles of the United Nations Global Compact, and reflect our aim of respecting human rights as laid out in the United Nations Guiding Principles on Business and Human Rights.

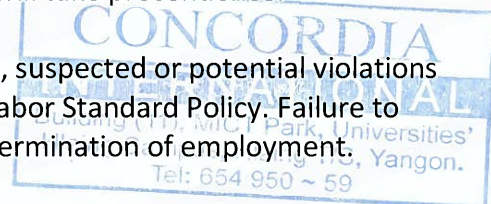
The underlying Policy applies to all Concordia directors, officers and employees of Concordia and those of its wholly-owned subsidiaries ("Concordia Employees").

B. Policy Statement

Concordia Int'l Ltd (Concordia) seeks to provide a work environment where employees are treated with respect, dignity and consideration. This commitment is built upon a framework of policies and procedures designed to ensure fairness in the recruitment, development and retention of all employees.

C. General Principles

1. All employment must be in compliance with all applicable laws and regulations of the countries in which Concordia operates. Where the applicable local laws and regulations require higher or additional levels of protection of human and employment rights than those set out in this Policy, the local laws and regulations will take precedence.
2. All Concordia Employees are required to report any actual, suspected or potential violations of all Company policies, including this Human Rights and Labor Standard Policy. Failure to do so may lead to disciplinary action, up to and including termination of employment.
3. This Policy shall be reviewed on an annual basic and updated where necessary to ensure the continuous improvement of working conditions and management of labor risks in Concordia's operations.



4. Concordia shall make available sufficient resources to give effect to its commitment to year on year improvements to working conditions and management of labor risks in its global operations.

D. Specific Provisions

1. Human Rights

Concordia supports and complies with the United Nations' Universal Declaration of Human Rights and seeks to honor the principles of internationally recognized human rights wherever it operates.

Each Concordia employee shall be treated with dignity and shall not suffer harassment, physical or mental punishment or other forms of abuse.

Concordia has effective grievance mechanisms which are transparent, equitable and predictable to enable the remediation of any adverse human rights impacts that may arise in its operations.

Concordia promotes effective employee engagement throughout its operations and welcomes open feedback from employees on all matters of company business.

2. Freedom of Association

Concordia recognizes and respects the right of employees to establish and join organizations.

No Concordia employee shall be dismissed or otherwise prejudiced for reason of membership of such an employee organization or because of participation in that organization.

3. Compulsory Labor and Human Trafficking

Concordia does not accept nor condone any form of modern slavery whether forced, compulsory or trafficked labor. Without limitation, Concordia does not engage sweatshop labor, convict labor or indentured labor under penal sanction.

All Concordia employees shall provide their services to the Company on an entirely voluntary basis and no one shall be forced to remain in the employ of Concordia against their will.

Concordia has a zero-tolerance approach to modern slavery and encourages all employees to raise concerns about any issue or suspicion of modern slavery, in any part of the Concordia business at the earliest opportunity.

5. Child Labor

Concordia adheres to and strictly complies with international child labor conventions and local child labor laws and regulations.

The minimum age of a Concordia Employee shall be not less than the age of completion of compulsory education in the country of location of the relevant Concordia business unit, and in any event, shall not be less than 16 years.

Where the work concerned is by its nature or the circumstances in which it is carried out, deemed to be “hazardous” under the definition provided by the International Labor Organization 138 Concerning Minimum Age, the minimum age of the Concordia Employee shall be not less than 18 years.

6. Non-Discrimination and Anti-Harassment

At Concordia, we believe that all employees have the right to work in a respectful environment that is free of unlawful discrimination and retaliation.

Concordia is an equal opportunity employer and conducts all hiring and employment practices in strict accordance with all applicable laws and regulations governing fair employment practices. As such, any form of harassment or unlawful discrimination is not tolerated.

Concordia strictly prohibits discrimination and harassment against any Concordia Employee or any applicant for employment with Concordia, whether such discrimination or harassment is based on sex, race, age, color, ancestry, religion, belief, disability, sexual orientation, marital status or any other feature protected by law.

7. Remuneration and Working Hours

Concordia provides employees with regionally competitive compensation and benefits packages that meet all regulatory requirements and Myanmar Minimum Wages Guidelines. Working hours are managed in strict accordance with local regulations.

8. Safe and Healthy Working Environment

Our vision as a company is to conduct our operations in an incident-free workplace, all the time, everywhere. We work toward this goal by ensuring the physical security of our premises and minimizing the occupational health and safety risks in our work sites.

Our Health, Safety, and Environment (HSE) Policy implements controls, procedures, and processes designed to eliminate or mitigate these risks to As Low As Reasonably Practicable (ALARP).

E. Reporting Concerns

Should you believe that Concordia or individuals subject to this policy have acted inconsistently with the principles herein, we encourage you to communicate your concerns to us via Help Line email Compliance@concordia.com.mm.

The Help Line allows you to remain anonymous (where allowed by law). To encourage reporting, Concordia adheres to a strict non-retaliation policy for concerns raised in good faith. Finally, we are committed to investigating and responding to such concerns in a prompt and responsible manner.

Dr Than Win
Chief Executive Officer
Concordia

17 September 2022

Environmental Management Policy, Objectives & Targets

“Concordia Int’l Ltd (Concordia) recognizes that our business has an important role to play in protecting and enhancing the environment for future generations and to help secure the long-term sustainability of the local economy”.

To this end Concordia is committed to taking the following action;

- To achieve sound environmental practices across our entire operation
- To produce an annual Environmental Plan setting out our Objectives, Targets and planned Actions
- To comply fully with all relevant legislation
- To minimize our waste and reduce our water consumption where possible
- To reduce, Reuse, Recycle the resources consumed by our business wherever practical
- To invite our customers, suppliers and contractors to participate in our efforts to protect the environment
- To provide all employees with the training and resources required to meet our objectives
- To openly communicate our policies and practices to interested parties
- To monitor and record our environmental impacts on a regular basis and compare our performance with our policies, objectives and targets”
-

Major Targets & Objectives 2022

1. Energy

- To reduce our Energy consumption by 10% in 2022 over 2021 and reduce Carbon Emissions by 10%.

2. Water

- To reduce consumption of Water by 5% in 2022 over 2021 which will be the equivalent of 80,000 gallons of water.

3. Waste

- To reduce the waste we send to landfill by 20% in 2022 over 2021 which will be equivalent to 4,000kg.

4. Green Purchasing

- To engage with our suppliers to reduce packaging by 20%
- To increase usage of recycled paper products to 10% of all paper/cardboard purchased

5. Community Social Responsibility

- To continue our involvement with “Adopt a University Student Program” and local Rotary Clubs, Emergency Care Responders.
- To engage in a local “Clean Up” at least once a year in conjunction with the Myanmar Dive Center along our beach

17 September 2022

Anti-Bribery and Corruption Statement

Introduction

Concordia Int'l Ltd (Concordia) is committed to conducting business ethically in where we operate, as well as complying with all applicable laws. This includes compliance with anti-bribery and anti-corruption ("ABC") laws such as the Myanmar Anti-Corruption Law 2013 (https://www.asean-pac.org/wp-content/uploads/2016/11/ACCL_en_4.pdf) and Concordia is member UN Global Compact 10 Principles including anti-corruption (<https://www.unglobalcompact.org/what-is-gc/mission/principles/principle-10.>)

The purpose of this document is to set out Concordia's stance in relation to bribery and corruption. This statement applies to all consultants, agents, sales reps, associated third parties and contractors of FT within all regions, areas and functions.

Concordia is preparing now to become a listed company in Myanmar Security Exchange by 2023. In this process a good corporate governance, transparency and paying due taxes is of primary priority for the company. We are being audited by one of the top External Auditor Win Thin & Associates for our financial papers to be scrutinized by Myanmar Security Exchange. Our legal documents are also being reviewed by Allen & Gledhill to conform to the very strict Myanmar Security Exchange requirement (which is set up in collaboration with Daiwa Institute, Japan).

Concordia is preparing to have ISO Certification

Concordia has a zero tolerance policy towards bribery and corruption.

Concordia staff and others working on our behalf must not offer, promise or give a bribe to anyone, and must not request, agree to accept, or take a bribe from anyone.

Concordia has in place measures to maintain its high ethical standards and protect its reputation against any allegations of bribery and corruption. It is the Concordia's policy to compete fairly. We want to win business because of the quality and competitiveness of our products and services. We will not attempt to win on any other basis. We seek to positively influence others wherever practical by setting an example and openly refusing to undertake or support bribery as a way of doing business anywhere the world.

Bribery is illegal

Bribery is a crime, and penalties can be severe, including prison sentences and large financial penalties. The Myanmar Anti-Corruption Law 2013 applies to Concordia and those performing services on its behalf.

In addition to the Myanmar Anti-Corruption Law 2013, there are a number of anti-bribery and corruption laws globally, which Concordia and those providing products and services may need to comply with. For example, under the US Foreign Corrupt Practices Act (“FCPA”) it is a crime to bribe a foreign official for the purpose of obtaining or retaining business or to secure an improper advantage.

Recognizing bribery and corruption

A bribe could involve:

- The direct or indirect promise, offer, authorization, or provision of anything of value.
- The offer or receipt of any kickback, loan, fee, commission, reward, or other advantage.
- The giving of contributions or donations designed or stipulated to influence the recipient to act in the giver’s favor.

The purpose of a bribe is often to obtain, retain or “facilitate” business, where the person receiving the bribe is, or may be, in a position to provide that kind of business advantage to the party offering the bribe. This may involve sales initiatives, such as tendering and contracting; or, it may simply involve the handling of administrative tasks such as licenses, customs, taxes or import/export matters. It does not matter whether the act of bribery is committed before or after the tendering of a contract or the completion of an administrative task.

The party offering or receiving a bribe might be:

- An employee, officer or director.
- Any person acting on behalf of FT (e.g., third party suppliers or agents).
- Individuals and organizations representing FT that authorize someone else to carry out these acts.

Where do bribery and corruption risks typically arise?

This section deals with some specific situations that may present concern about the potential for bribery or corruption.

Use of agents and third parties

Because the actions of an agent, or third party acting on Concordia's behalf, can expose Concordia to liability under ABC laws, a level of due diligence appropriate to the market may be undertaken prior to the appointment of an agent or third party, and at renewal of any agreement with an agent or third party. Particular care will be taken to understand any connection to a government official. It is the third party's responsibility to fully declare any such connection or any other relevant factors to Concordia.

FT may require that agreements with agents and third parties include provisions regarding compliance with ABC laws.

Hospitality and entertainment

Bona fide hospitality and promotional or other business expenditure, which seeks to promote our brand, to better present products and services, or to establish cordial relations, is recognized as an established and important part of doing business.

Hospitality, entertainment, or other business expenses provided to business partners and customers for these purposes are permitted, as long as they are reasonable and proportionate, and are not intended to influence the outcome of any business transaction. If you have any queries, please discuss these with your FT contact or email Compliance@ft.com.

Hospitality, entertainment or other similar expenses are not permitted if:

- It might influence the outcome of a business transaction, whatever the value of the expense, or a reasonable individual could interpret it that way.
- It is for the purpose of facilitating or expediting any decision to award new business, to renew existing business or to take any other action.
- It is given for personal benefit, friendship, personal acquaintances or family purposes.

Giving and receiving gifts

In Myanmar, there are generally accepted customs regarding the exchange of business gifts to strengthen business relationships. Concordia generally permits the giving and receiving of business gifts of 'Nominal Value' that are customary business courtesies and are reasonable in value and frequency; for Concordia staff this may mean prior approval from the Concordia's designated ABC manager.

The giving or receiving of gifts (or otherwise personal preferential treatment) by Concordia staff or third parties acting on our behalf must never:

- - Be used to obligate, or appear to obligate, the recipient.
- - Be of cash, cash vouchers, certificates with a set negotiable value, or other cash equivalents.
- - Be sought or requested from any person or organization.

Facilitation payments

Facilitation payments are defined as "any facilitating payment or expediting payment to an official, political party, or party official, the purpose of which is to expedite or to secure the performance of a routine governmental action". They are illegal under Myanmar law and the laws of many other countries, and are prohibited by Concordia policy.

No Concordia employee, agent or third party acting on Concordia's behalf may willingly offer to make, or make, a facilitation payment.

Payments to facilitate tax evasion

Concordia will not facilitate the evasion of tax by a customer, supplier or other third party, including government officials and contractors, by making payments to offshore bank accounts, or by other means, which have no commercial basis or could be construed by tax authorities to be made to facilitate tax evasion by the recipient.

Reporting

If you are aware of any Concordia related non-compliance with this statement or applicable ABC Laws and Regulations you can report it to our Compliance Committee (Compliance@concordia.com.mm).

Concordia staff should follow our internal whistleblowing policy.

Dr Than Win
Chief Executive Officer
Concordia

17 September 2022