

HR POLICY AND PROCEDURE MANUAL

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WELCOME

Congratulations on your appointment and welcome to the team at **VANGUARD**! We are excited that you have decided to join us and look forward to a long, happy and successful partnership together. Our business is primarily about holding ourselves accountable for our customers, shareholders, partners and employees by honoring our commitments, providing results, and striving for the highest quality. You have been hired because we believe you can help us to deliver these high levels of value. We want to ensure that your interactions with other VANGUARD's employees and our customers will reflect the value that VANGUARD places on people, teamwork, and our commitments to our customers, partners and employees.

The purpose of this Manual is to introduce you to the VANGUARD, and give you some information about our history, our clients and what we do. You will also find information about your terms and conditions and employment, our expectations around your behaviour and our policies and procedures. This manual should be read in conjunction with your Contract of Employment.

This Manual is by no means an exhaustive guide to your employment with us. It has been developed to act as a resource and reference for you. The policies within this Manual are easily listed and easily accessed via the contents page. This Manual will be updated as required as our business evolves and grows. You will be notified of any changes as they occur. If you have any questions about the content, please do not hesitate to ask.

OUR COMPANY HISTORY

VANGUARD started in 2011 and expanded from start-up consulting firm and become a leader of ERP software providers in Myanmar in 2014. The company has grown from three employees to a team of 55 which consist of 42 local consultants with specialized expertise and experiences across a range of industries.

VANGUARD is Value-added-Reseller (VAR) status from SAP with Gold partner status. The core values of VANGUARD's product and service offerings are providing the very best design and implementation strategy possible and implementing the solution that is best suited to customers' needs.

WHAT WE DO

VANGUARD is a specialist in implementing ERP software to organisations of all sizes, with vast experience in local projects right through to international implementations. VANGUARD also offers comprehensive consultancy, product support and training as well as project management services. VANGUARD has the knowledge and experience to cater all your business management solution requirements.

VANGUARD brings a wealth of IT, Business and Finance experience and expertise in the areas of business process, project management, system development, communication and data integration.

- Integrated services from strategy through implementation and operation
- Deep Industry expertise and knowledge of business processes
- Large pool of resources with end-to-end implementation experience
- Prime contracting with total responsibility for the solution provided
- End-to-end service capability including implementation, upgrades, migration, integration and production support & maintenance

OUR MISSION, VISION & VALUES

Vision & Mission

- To become a leading technology consulting firm and bringing innovation to improve the way business work in SEA Region
- To help our clients to move their business forward faster with clarity. To solve their business problem with technology and to prepare for their future.

Values

We are committed to our customers and partners and have a passion for technology. We take on big challenges, and pride ourselves on seeing them through. We hold ourselves accountable to our customers, shareholders, partners, and employees by honouring our commitments, providing results, and striving for the highest quality.

To create and work in environment where mutual respect and trust is highly regarded, one will work in a way which he/she can obtain trust and respect in the same time giving trust and respect to others.

Go beyond the call of duty and actively participate to solve the problem, with sincere and dedicated attitude focus on purpose

YOUR EMPLOYMENT

Your employment with VANGUARD is essentially governed by your contract of employment, VANGUARD Policies, in conjunction with this Manual. The following section provides general information regarding your pay, conditions and our expectations of you.

Payroll

Your pay cycle is monthly and pays are processed on 1st working day of every month. Pays will be transferred into your ATM card account details provided to VANGUARD. Payslip will also be send to your email.

Changing Pay Details

Please advise the Human Resource manager via email should you wish to change any pay details like changing or closing your bank account or payment system. Please ensure you notify us prior to the date you wish for the change to be effective by.

Hours of Work

Office/Business hours are generally between 8:00am to 5:30pm Monday to Friday. Saturday and Sunday is off. You can take 45 minutes for lunch in afternoon and 15 minutes tea break in the evening. A minimum of 40 working hours excluding lunch and breaktime is required.

Overtime and Additional Hours

Overtime is work which is performed at the need of the projects and which is in excess of your contracted hours of work. If you cannot for some reason work reasonable additional or overtime hours, you must notify your Manager as soon as practicable with the reasons as to why, You could get your overtime form in your google drive and record your overtime with it, overtime form need to be approved by your manager in advance.

Lateness of Work

Any absence or late arrival due to illness, injury or any other reason, and the expected duration of leave must be personally reported to your supervisor as soon as practicable (and prior to your normal starting time wherever possible). If you are unable to do this personally, you are requested to ask someone to telephone on your behalf.

Subsequent to this, you must keep your Manager informed of your progress. Wherever possible you should make dental, medical, business or other appointments outside your normal working hours. It is essential that you are ready to commence work at your normal commencement time as other employees and the business depend upon you and your contribution.

Reimbursement of Expenses

VANGUARD will reimburse employees for pre-approved expenses properly incurred by employees in the proper performance of their duties. Reimbursement will be subject to employees providing the Practice with receipts or other evidence of payment and of the purpose of each expense, in a form reasonably required by the VANGUARD. Employees will also be required to complete the Expense Reimbursement Form which is included in the Office Forms section of this Manual.

Travel

Reasonable travelling expenses, where incurred in the performance of an employee's duties, will be reimbursed, provided that all claims are made on the appropriate form, signed by the appropriate Manager. When traveling in the state employees should arrange travel and accommodation through the

VANGUARD preferred travel supplier prior to departure. Generally air travel will be by economy class, with a carrier chosen by the VANGUARD,

<u>Travel Expenses & Allowances (Local)</u>

Accommodation = Maximum (50,000 Ks) per night

Meal Allowance = Maximum (20,000 Ks) per day

Note: All expenses should have a supporting document such as receipts & invoices.

<u>Travel Expenses & Allowances (Oversea-Asean Region)</u>

Meal Allowance = US\$ 20 per day

Note: Accommodation and other expenses should have supporting documents such as receipts & invoices.

If an employee use his/her own car for work related travel, Vanguard strongly suggest him/her to have his/her car covered by insurance and he/she will be taking their own risk. The risk related to driving personal car can be very high and unpredictable, thus Vanguard will not be responsible/liable for any incident occurred from driving own car for work related travel.

If an employee joining a leisure trip organised by Vanguard or employee and he/she will be taking their own risk for the trip. Vanguard will not be responsible/liable for any incident occurred related to the trip.

Benefit Entitlement

Employee can only enjoy the benefit (Such as Bonus and Incentive) only if he/she is still employed by Vanguard when the benefit payment is due.

BUSINESS ENVIRONMENT

Work Areas

As many employees work in an open plan area, it is important that your workstation and or desk remains clean and tidy and free of boxes, papers and magazines. Our expectation is that your workstation will be cleared and tidied at the end of every day. Any items that require storage should be put away, hard copy paper files should be kept to a minimum, with soft copies of files stored on the relevant shared drive electronically.

Security

Entry to the VANGUARD premises during and / or outside of normal business hours will be by way of keys/security pass. It is the responsibility of every VANGUARD employee to ensure that this key/security pass is kept in safe custody. It must be returned on demand.

If building access devices are lost or misplaced, you must notify your Manager immediately so that they can be cancelled.

Shall you need access to the office outside working day please notify IT manager.

Employees must ensure that all confidential/sensitive documents are locked away at night. You should ensure your personal belongings and valuables are locked away and secured. Personal property is not covered by Company insurance.

Kitchen & Bathrooms

Please keep the kitchen and bathroom areas clean at all times, cleaning up after use. You should be mindful that these are public areas and you should be respectful to others by always cleaning up after yourself. If you use dishes then wash them immediately after use.

If there are any issues with these facilities you should notify your Manager immediately.

Meeting Rooms

If you need to use a meeting room please ensure that there is no others' appointment at the time. Please tidy up after meetings, take away your dirty cups, files papers etc. Place chairs back in position and clean all work away.

Printing

Save costs on printing wherever possible by printing on both sides of paper. Please pick up all printed matter off the printer and ensure that the printer is stocked with paper at all times. Colour printing should be kept to a minimum.

Waste Bins

There are bins around the office. These bins should be used for any items which are not recyclable eg; plastics, metal, a pen, food scraps etc. Please use your discretion and be mindful of disposing food scraps in the office. Liquids should not be poured/ placed into bins.

Security Disposal/Shredders

Paperwork with any sensitive or confidential **VANGUARD** information needs to be disposed of by either being shredded. The key for this bin will be the responsibility of the Practice Manager. Documents to be placed in the security bins include but are not limited to:

- Company Information
- Client information
- Forms
- Terms and conditions
- Policies

The Noise Factor

Try to avoid shouting at each other across the office or on site at a client and respect people's busy periods or meeting times. Or if someone is engrossed in something at their computer or there are

more than two people meeting with someone, it usually means they are busy. Try to talk quietly when you are on the telephone and respect others around you.

CODE OF CONDUCT POLICY

Purpose

This policy affirms **VANGUARD**'s belief in responsible social and ethical behaviour from all employees. This policy clarifies the standards of behaviour that **VANGUARD** expects of all employees.

Principles

Our employees contribute to the success of our organisation and that of our Clients. **VANGUARD** fully endorse that all employees are not deprived of their basic human rights.

Furthermore, our employees have an obligation to the Business, our Clients and themselves to observe high standards of integrity and fair dealing. Unlawful and unethical business practices undermine employee and Client trust.

Policy

Our Code of Conduct policy applies to all employees and provides the framework of principles for conducting business, dealing with other employees, Clients and suppliers. The Code of Conduct does not replace legislation and if any part of it is in conflict, then legislation takes precedence. This policy is based on the following:

- Act, speak and dress professionally
- Cultivate empathy and maintain a high standard of integrity
- Be responsible and scrupulous in the proper use of Company information, funds, equipment and facilities
- Exercise fairness, equality, courtesy, consideration and sensitivity in dealing with other employees, clients and suppliers
- Perform duties with skill, honesty, care and diligence
- Abide by policies, procedures and lawful directions that relate to your employment with VANGUARD and/or our Clients

VANGUARD expects co-operation from all employees in conducting themselves in a professional, ethical and socially acceptable manner of the highest standards. Any employee in breach of this policy may be subject to disciplinary action, including termination.

Should an employee have doubts about any aspect of the Code of Conduct, they must seek clarification from HR manager.

This policy will be regularly reviewed by VANGUARD and any necessary changes will be implemented by HR manager.

Anti-Bribery Code of Conduct

1. Zero-Tolerance for Bribery:

All employees, regardless of their position or role, are not allowed to give, receive, promise, or authorize any bribe, whether directly or indirectly. This includes any improper payment or transfer of value to influence the behaviour of someone in government, business, or private individuals to gain an unfair or improper advantage.

2. Gifts and Hospitality:

Gifts and hospitalities are not allowed if they could influence or appear to influence a business decision. All gifts must be legal, reasonable, approved by a manager, and recorded appropriately. All gifts should be declared and documented in our company's gift register.

3. Charitable Donations and Sponsorships:

All charitable donations and sponsorships should be made transparently and ethically. Due diligence should be conducted to ensure such donations do not serve as a disguise for bribery.

4. Record Keeping:

Accurate records of all financial transactions related to our business must be kept. These records must be clear and not misleading.

5. Conflict of Interest:

All employees must avoid any activities that might lead to, or suggest, a conflict of interest with the business of the company. If there is any potential for perceived or actual conflict of interest, it must be disclosed to the company immediately.

6. Business Partners:

We are committed to working only with business partners who share our values and commitment to compliance. Any engagement with a business partner must include appropriate due diligence, contractual obligations regarding anti-bribery, and regular monitoring.

7. Reporting:

Employees should report any concerns, suspicions or knowledge of bribery through the established confidential reporting mechanism. There will be no retaliation against anyone who reports in good faith.

8. Training and Communication:

Employees will receive regular training on this policy and the company's commitment to anti-bribery. This policy will be communicated to all employees, contractors, and business partners.

9. Compliance and Monitoring:

All employees are responsible for complying with this policy. The company will monitor compliance and impose discipline for non-compliance, up to and including termination.

10. Enforcement:

Failure to comply with this policy, regardless of the position of the person involved, will lead to disciplinary actions, which may include termination.

This policy is not exhaustive, and there may be additional obligations that employees need to fulfill to ensure we conduct our business ethically and legally. Remember, when in doubt, always ask for guidance.

DRESS CODE POLICY

VANGUARD's objective in establishing a safe and comfortable environment includes setting some standards for workplace dress code. This is to enable all people to project a professional image that is in keeping with the needs of our clients and customers to trust us. Because our industry requires the appearance of trusted professionals a standard dress code is necessary for everyone.

Office Employees

Office employees are expected to dress professionally and formal during work hours. Office employees must dress in a neat and well-presented manner at all times.

Prohibited Clothing

Employees should not wear ripped clothing of any sort, low cut clothing such as jeans and shirts, track suits.

IT, INTERNET, EMAIL & SOCIAL MEDIA POLICIES

INTERNET USE

The internet is provided by VANGUARD for business use. Limited private use is permitted if the private use does not interfere with a person's work and that inappropriate sites are not accessed e.g. pornographic, gambling, gaming Management has the right to access the system to check if private use is excessive or inappropriate.

Failure to comply with these instructions is an offence and will be subject to appropriate investigation. In serious cases, the penalty for an offence, or repetition of an offence, may include dismissal. Staff need to be aware that some forms of internet conduct may lead to criminal prosecution.

EMAIL USE

- 1. Email facilities are provided for formal business correspondence.
- 2. Take care to maintain the confidentiality of sensitive information. If emails need to be preserved, they should be backed up and stored offsite.
- 3. Limited private use of email is allowed if it doesn't interfere with or distract from an employee's work. However, management has the right to access incoming and outgoing

- email messages to check if an employee's usage or involvement is excessive or inappropriate.
- 4. Non-essential email, including personal messages, should be deleted regularly from the 'Sent Items', 'Inbox' and 'Deleted Items' folders to avoid congestion.
- 5. All emails sent must include the approved business disclaimer.

To protect VANGUARD from the potential effects of the misuse and abuse of email, the following instructions are for all users:

- 1. No material is to be sent as email that is defamatory, in breach of copyright or business confidentiality, or prejudicial to the good standing of VANGUARD in the community or to its relationship with staff, customers, suppliers and any other person or business with whom it has a relationship.
- Email must not contain material that amounts to gossip about colleagues or that could be
 offensive, demeaning, persistently irritating, threatening, and discriminatory, involves the
 harassment of others or concerns personal relationships.
- 3. The email records of other persons are not to be accessed except by management (or persons authorised by management) ensuring compliance with this policy, or by authorised staff who have been requested to attend to a fault, upgrade or similar situation. Access in each case will be limited to the minimum needed for the task.
- 4. When using email a person must not pretend to be another person or use another person's computer without permission.
- 5. Excessive private use, including mass mailing, "reply to all" etc. that are not part of the person's duties, is not permitted.

RECRUITMENT

Policy

VANGUARD recognises a robust and professional approach to recruitment and selection helps us to attract and appoint individuals with the necessary skills and attributes to fulfil our aims and support our business goals. Our Business recruits people via the following methods:

- Internal
- External
- Employee Referred

Procedure

- 1. Create a simple position description for the job covering key activities, tasks, skills required, expectations, deliverables and safety considerations. When advertising, avoid discriminatory language e.g. young person. Target the requirements of the job e.g. we seek an energetic person.
- 2. The recruitment process may include some or all of these: an application form, interviews, practical testing, reference checks, and right to work in Myanmar checks. If undertaking an interview ensure there are no possible discriminatory requests for information, for example do you plan to have a family in the near future?

- 3. Give the successful candidate a contract of employment setting out clear terms and conditions. This includes the nature of employment e.g. permanent part time, casual. The contract should include a welcome note and start details.
- 4. Once the candidate has accepted, contact the unsuccessful candidates as a matter of courtesy.

TRAINING & DEVELOPMENT

Policy

VANGUARD will give employees adequate training to do their job safely and competently. Our business believes training is a two-way process. We encourage employees to participate and to highlight any gaps in their own skills or knowledge they believe they have.

Training includes internal on-the-job training, written instructions such as standard operating procedures, coaching, external training and courses.

VANGUARD commits to providing every employee with training materials and resources.

External Training Policy

- An employee who are attending for external training, signing agreement in Company Bond Training Agreement.
- After attending the training period, computing for the breaching of the bonding agreement will subject the concerned employees to the following terms:
- Training expenses cost are included with Conference and Seminar Attending Cost, Entrance Cost, Accommodation and Meal Cost, and Transportation Cost.

No.	Training Cost	Bonding Period	Breaking Contract
1.	MMK 1,000,000< 2,000,000	6 Months	Double
			Repayment
2.	MMK 2,000,001 < MMK 3,000,000	12 Months (1 Year)	Double
			Repayment
3.	MMK 3,000,000 <	24 Months (2 Year)	Double
			Repayment

 An employee need to attend for external training, please completed to submit Training Requisition Form, Training Course and Timetable from approval of related department head and final submitted to Executive Management.

PROBATION

Policy

The 3 month probationary period is a time for both the employee and the business to assess suitability, fit and competency within a role. During this period the VANGUARD commits to reviewing employee performance and at the end of this time ongoing permanent employment will be confirmed.

Employees sign in to start probation period in within (14) days, the date on institution and Employment Contract signed by all employees.

TERMINATION OF CONTRACT

Policy

Termination of contract may be effected at any time by the Company or yourself. Your service may be terminated by giving notice to the other, depending on your role and position as follow:

Head and Director: 6 month notice or 6 month salary in lieu of notice.

Head and Senior Manager: 3 month notice or 3 month salary in lieu of notice.

Manager: 2 month notice or 2 month salary in lieu of notice.

General Employee: 1 month notice or 1 month salary in lieu of notice.

LEAVE

General leave policy

Unless specified otherwise, employees referred to in this policy mean permanent full-time or part-time employees.

All employees are entitled to leave in accordance with the relevant awards or agreements and statutory provisions. Where the entitlements or practices in this document conflict, the applicable award, workplace agreement, employment contract or employment law takes precedence.

Annual (earned) leave policy

Employees are entitled for 10 days annual leave after one year of employment, there fourth annual leave are accumulated monthly, e.g. 0.83 days per month, annual leave carried forward to the next

calendar year provided that total annual leave does not exceed 10 days at any point in time. Employee need to apply in advance before 48 hours (2 Days) will be submitted to related department head.

Overtime leave policy

Overtime Leave must be approved by managers/directors before leave can be taken, overtime leaves carried forward to the next calendar year, employee need to apply overtime leave 48 hours (2 Days) in advance in SuccessFactor for approval.

All planned leave has to be mutually agreed, and take into account workloads and the employee's needs. Leave must be approved in advance, except when the employee can't anticipate the absence. Fill the application form, get approval and send it to HR before or after taking a leave. Documents regarding leave will be kept on the employee's personnel file.

Personal (sick) leave policy

- Employees are entitled for 4 days medical/sick leave if they are unable to attend work due to illness or injury.
- Management, at its discretion, may request evidence such as a medical certificate/ recommendation from related doctor/clinic showing that the employee was entitled to take personal leave during the relevant period.
- If we haven't get of Medical Certificate/Recommendation Letter from any employees, we will deduct from each daily salary when calculating the payroll process by monthly.

PERFORMANCE MANAGEMENT

Policy

The purpose of performance management is to improve performance. It is an ongoing process. It should include informal and formal review. We encourage a two-way process, that is, employees can also give management feedback on performance.

All employees will undergo a formal performance review with their immediate managers at least 2 times a year.

Procedure

- 1. The manager and the employee agree on the date for a performance appraisal meeting to allow time to prepare.
- 2. The manager and employee will meet and openly and constructively discuss performance over the period.
- 3. The manager and the employee will agree any objectives and outcomes for the next appraisal period.
- 4. Training and development will be considered as part of the process.

- 5. Notes should be taken of the meeting and copies kept.
- 6. Outside of this formal process, employees are encouraged to raise any issues they have when they arise.

INTELLECTUAL PROPERTY & SECURITY

All intellectual property developed by employees during their employment with VANGUARD, including discoveries or inventions made in the performance of their duties related in any way to the business of VANGUARD, will remain the property of VANGUARD.

Employees may be given access to confidential information, data, business property, keys to premises or any other business related property/information in the performance of their duties. This must be protected and used only in the interests of VANGUARD.

Employees must not:

- Disclose or use any part of any confidential information outside of the performance of their duties and in the interests of VANGUARD; or
- Authorise or be involved in the improper use or disclosure of confidential information; during
 or after their employment without the Employer's written consent, other than as required by
 law.

'Confidential information' includes any information in any form relating to VANGUARD and related bodies, clients or businesses, which is not in the public domain.

Employees must act in good faith towards VANGUARD and must prevent the unauthorised disclosure of any confidential information. Failure to comply with this policy may result in performance improvement proceedings including dismissal, and VANGUARD may also pursue monetary damages or other remedies.

Any offence and criminal action will be handed to Myanmar Police Force and dealt with according to Myanmar Law.

FRATERNIZATION POLICY & GUIDANCE

POLICY STATEMENT

- 1. Work place romance and dating is strongly discouraged at Vanguard.
- 2. Co-worker relationship in the same department is not acceptable at all in vanguard.
- 3. Managers to subordinate relationship is not acceptable at all in Vanguard even from different department.

FRATERNIZATION POLICY

Romantic relationship among employee is strongly prohibited at Vanguard

SEXUAL HARASSMENT POLICY

POLICY BRIEF & PURPOSE

Vanguard Myanmar Company, recognizes the right of every employee and volunteer to be able to attend work and to perform their duties without being subjected to any form of sexual harassment. It is fully committed to its obligation to eliminate sexual harassment in the workplace.

The purpose of this document is to outline Vanguard Myanmar Company's position on sexual harassment and to document the process which is to be followed should any grievances arise.

DEFINING SEXUAL HARASSMENT

Sexual harassment is a form of sex discrimination that involves unwelcome conduct of a sexual nature. Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when:

- An employment decision affecting that individual is made because the individual submitted to or rejected the unwelcome conduct; or
- The unwelcome conduct interferes with an individual's work performance or creates an intimidating, hostile, or abusive work environment.

Unwelcome actions such as the following are inappropriate and, depending on the circumstances, may contribute to a hostile work environment and meet the definition of sexual harassment.

- Sexually-explicit statements, jokes, teasing, or innuendo, in person or via email, text message, or written communication;
- Verbal abuse of a sexual nature;
- Touching or grabbing of a sexual nature;
- Unwelcome sexual advances whether they involve physical touching or not;
- Giving gifts or leaving objects that are sexually suggestive;
- Repeatedly making sexually suggestive gestures;
- Making or posting sexually demeaning or offensive pictures, cartoons or other materials in the workplace;
- Off-duty, unwelcome conduct of a sexual nature that affects the work environment;
- Sexual violence such as domestic or intimate partner violence, sexual assault, sexual battery, sexual coercion, attempted rape, and rape.

POLICY STATEMENT

Vanguard Myanmar Company Ltd., will not tolerate sexual harassment under any circumstances. Responsibility lies with every Manager, Supervisor, and employee/ volunteer to ensure that sexual harassment does not occur.

- This policy applies to conduct that takes place in any work-related context, including conferences, work functions, social events and business trips.
- No employee or volunteer at any level should subject any other employee, volunteer, customer or visitor to any form of sexual harassment.

- A breach of this policy will result in disciplinary action, up to and including termination of employment.
- Vanguard Myanmar is strongly encourages any employee who feels they have been sexually harassed to take immediate action.
- Any reports of sexual harassment will be treated seriously and promptly with sensitively.
- Such reports will be treated as completely confidential up to the point where a formal or informal complaint is lodged against a particular person, at which point that person must be notified under the rules of natural justice.
- All employees and volunteers have the right to seek the assistance of the relevant tribunal
 or legislative body to assist them in the resolution of any concerns.
- Managers or Supervisors who fail to take appropriate corrective action when aware of harassment of a person will be subject to disciplinary action.

COMPLAINT PROCEDURES

Sexual harassment can occur at any level of the organisation, can be experienced by both men and women and may involve a co-worker, volunteer, supervisor, manager, service provider, client or customer. Lack of intent is no defense in sexual harassment cases.

- Employees or volunteers who believe they are the subject of sexual harassment should take firm, positive and prompt action.
- Where possible, the employee or volunteer should make the perceived harasser (s) aware that they find their behaviour offensive, unwelcome, unacceptable, and that it needs to stop immediately.
- If the behaviour continues, or if the employee or volunteer feels unable to speak to the person (s) directly, they should contact their Supervisor or Manager. Alternatively, an employee or volunteer may contact the Human Resource Department.
- The Manager will provide support and ascertain the nature of the complaint and the wishes of the complainant.

PROCEDURES FOR DEALING WITH CRIMINAL CONDUCT

- Some forms of severe sexual harassment (e.g. sexual assault, stalking, indecent exposure, physical molestation, obscene phone calls) may constitute criminal conduct.
- Vanguard Myanmar Company is committed to treat most sexual harassment complaints at a company level as far as possible, this type of conduct is not suited to internal resolution.
 Such complaints should be treated by the criminal justice system.
- In relation to alleged criminal offenses such as rape or sexual assault, the matter must be immediately referred to the Human Resources Department. Employees/Volunteers should be advised of the option of police support or intervention. It is not the obligation or duty of the company to report such matters to the police on behalf of the complainant.