



KBZ BANK
STRENGTH OF MYANMAR

GUIDELINE TO PREVENT INSIDER TRADING
LEGAL & COMPLIANCE

GUIDELINE TO PREVENT INSIDER TRADING OF KANBAWZA BANK (“KBZ Bank”)

KBZ Bank realizes that the Security Exchange Law (“**SEL**”) was enacted on 2013 and it provides the framework for the establishment of a Yangon stock exchange (“**YSX**”). The Securities and Exchange Commission of Myanmar (“**SECM**”) issues an instruction for preventing insider trading to protect investor and achieve investor confidence in the fairness and soundness of securities market.

However, as a Financial services private company, KBZ Bank sets out this Policy regarding material information and it shall be applied to all employees of KBZ Bank. The following acts shall be complied:

- Do not disclose material information related to business or financial situation of KBZ Bank;
- Infringing security measures protected by the lawful owners of business secrets in accessing and collecting of business secrets and information related to such secret;
- Using information of business secret/strategy without permission of the owner of the business.

1. Prohibition

- A person uses internal information such as undisclosed material facts of the companies to other persons or discloses or provides internal information or gives advice to other persons regarding information based on undisclosed internal information.
- An insider is a person such as members of the board and employees being in a special position that enables the person to know material information related to business or financial situation of a company.
- An insider or a person receiving unpublished material information from an insider is in an advantageous position to other investors or businessmen not having such information.
- It is strictly prohibited for a person who knows KBZ Bank information before the company made disclosure of the information to the public or unpublished material information in terms of keeping fairness among investors.

2. Material Information

The following shall be material information:

- Financial results including unaudited financial statement;
- The information of Filings or settlement of a material lawsuits claiming to others company for the purpose of borrowed money as a Bank;
- The customers or borrowers' information from the KBZ Bank.

3. To prevent Insider Trading

- (a) All the employees have to know more about insider trading such as
- material information of KBZ Bank.

- even though there may not be relating parties of a company, material information shall not be disclosure once received its unpublished material information
 - Penalty for disclosing of such information and it will be a criminal.
 - insider trading can be damaged organization's reputation.
- (b) Do not spread material information to others
- Material information should not be shared with even the families or friends before publishing.

Regular reviews of this Policy are conducted by our Board to ensure they remain timely and relevant. Our most recent review was done in BOD meeting and approved by the Board on 25 August 2020.