

REAL GROWTH ENERGY CO., LTD.

Room No. 2006, Level -20, Office Tower (2), Times City, (7) Quarter, Kamayut Township, Yangon, Myanmar

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CODE OF ETHICS AND BUSINESS CONDUCT

Our Belief: To be a leading enterprise in regional energy, commodities, and infrastructure, focusing on people and operational excellence to ensure long-term stakeholder value.

Our Values: Teamwork, Humility, Respect, Initiative.

1. Build Trust and Recognition

The success of Real Growth Energy depends on the trust we earn from our employees, clients, and international business partners. We gain trust by sticking to our commitments, demonstrating honesty and integrity, and meeting company goals through honorable conduct.

2. Build Mutual Respect

Employees must avoid discrimination based on status, position, race, or religious faith. Harassing behavior, abusive speech, and personal attacks are strictly prohibited. Respectful interaction is mandated across all corporate ranks.

3. Create a Culture of Open and Honest Communication

All employees are obliged to maintain professional behavior and speech reflecting RGE's corporate culture. Unethical behavior will result in formal disciplinary action.

4. Abide by Ethical Rules, Regulations, and Laws

Management staff must act as role models. All personnel must acquaint themselves with RGE policies and strictly adhere to applicable local and international laws.

5. Compete Fairly and Squarely

Real Growth Energy is dedicated to fair commercial competition. We market products and services strictly based on merit, quality, functionality, and competitive pricing.

6. Proprietary Information & Selective Disclosure

Unauthorized use, copying, or distribution of company data, software, or nonpublic financial/operational information is strictly prohibited. Important nonpublic information relating to business operations, proposals, or financial conditions shall not be selectively disclosed.

7. Refrain from Conflicts of Interest

Employees must not use RGE property, information, or positions for personal or family gain. Conflict situations include: employment with a competitor/supplier, recruiting close family members, holding personal financial interests in transactions, or accepting improper gifts/favors from vendors.

8. Gifts, Gratuities, and Business Courtesies

Employees must avoid actions creating a perception of favorable treatment in exchange for business courtesies. Nominal unsolicited promotional items (pens, calendars) or modest occasion presents (flowers) may be accepted, but cash, honoraria, or excessive gifts are strictly forbidden.

9. Accurate Public Disclosures & Corporate Recordkeeping

All financial records, disclosures, and public documents must be full, fair, accurate, timely, and understandable. Improperly influencing, manipulating, or misleading internal/external auditors is illegal and strictly prohibited.

10. Use of Company Resources

RGE resources (equipment, computers, networks) are provided for official business use. Misuse for personal outside business, political/religious campaigns, or accessing offensive material is grounds for immediate termination.

Contract Employee Acknowledgment

**For and On Behalf of Real Growth
Energy Co., Ltd.**

Signature:

Name:

NRC / ID No.:

Date:

Signature:

Name:

Position:

Date:
