



DISCLOSURE FRAMEWORK

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I. GENERAL PROVISIONS

- 1.1. This Framework defines the scope of information subject to disclosure by uab bank Limited (uab bank or Bank) in its capacity as a bank licensed by the Central Bank of Myanmar.
- 1.2. Subject to relevant laws and in accordance with regulatory requirements, the Bank will disclose relevant information that are accurate and factual to the appropriate constituents.
- 1.3. The Policy on disclosure of information is applied in accordance with the Financial Institutions Law, Companies Law, Anti-money Laundering Law, The Foreign Exchange Management Law and the Corporate Governance Framework of the Bank.
- 1.4. These provisions apply to all uab bank personnel (including members of various Boards), interns, contractors and sub-contractors.

II. PURPOSE AND PRINCIPLES

- 2.1. The purpose of this Framework is to outline the provision of information to stakeholders, shareholders and investors, with a view to enable making objective and informed decisions and evaluations.
- 2.2. In disclosing information, the Bank shall ensure accuracy, timeliness and integrity
- 2.3. In certain cases, under the current legislation and regulations, the disclosure of certain information is not allowed. Such cases are:
 - 2.3.1. when disclosure leads to violation of a law or regulation;
 - 2.3.2. when information is confidential or relates to unfinished negotiations;
 - 2.3.3. when information constitutes official, bank or trade secret (confidential information).

III. INFORMATION CHANNELS

- 3.1. The following channels are used to disclosure information:
 - 3.1.1. Corporate website (www.uab.com.mm) with validated content and scope of disclosed information;
 - 3.1.2. Press releases, press conferences and newspaper advertisements and
 - 3.1.3. Other channels, including Facebook. LinkedIn, Television and radio interviews
- 3.2. In the disclosure of information, the Bank will appoint Authorized Spokespersons to communicate information and respond to queries accurately.

IV. INVESTOR RELATIONS

- 4.1. Whilst uab bank is held by private shareholders, the statutory information and disclosures to shareholders are made at General meetings of shareholders in accordance to the Companies Law.
- 4.2. All information to shareholders are provided in a timely manner before General meetings and members of the Board of Directors are available at General meetings to answer relevant questions
- 4.3. Provision of financial information and any other information that shareholders are entitled are readily provided
- 4.4. Registration of the necessary public forms are registered with the DICA in a timely manner including the Audited Accounts, Shareholders information and Directors information.

V. PERIODIC INFORMATION

- 5.1. The periodic information disclosed by uab bank includes but is not limited to:
 - 5.1.1. Annual financial statements certified by registered auditors approved by Central Bank of Myanmar and prepared in accordance with the Myanmar Accounting Standards.
 - 5.1.2. Annual Report containing reports and financial information approved by the Board of Directors.
 - 5.1.3. Product brochures describing various products of the Bank ranging from Deposits, Loans, Fund Transfer, Credit Cards, Electronic banking and other products.
 - 5.1.4. Statutory reports required by Central Bank of Myanmar (CBM) as directed by regulations. These external reports are made to solely to the CBM.
 - 5.1.5. Anti-money Laundering reports as statutorily required by the Myanmar Financial Intelligence Unit (MFIU). These reports are made solely to MFIU.

VI. CORPORATE WEBSITE

- 6.1. As part of the framework for disclosure of information, uab bank maintains a corporate website (www.uab.com.mm) with validated content, scope and up-dated information disclosed, in accordance with the regulatory requirements and best corporate practices.
- 6.2. The information on the corporate website is constantly reviewed, updated and archived. Historical information is also maintained with a view to ensuring transparency and familiarizing all stakeholders, shareholders and investors with the performance of the Bank.

VII. INTERNAL FLOW OF INFORMATION

- 7.1. Full disclosure of information on the matters of the Bank are made to the Board of Directors and the Management Team of the Bank. Regular meetings of the Board and Management Team are held to collectively review reports and recommendations made by various parties and working committees.
- 7.2. The Corporate Governance Framework will guide the governance structure of the Bank and full information is given to components of the structure as directed by the Framework.
- 7.2. Sub-Committees within the Bank will be guided by their Terms of Reference and receive full information as mandated by their Terms of Reference

VIII. NON-DISCLOSURE OF INFORMATION

- 8.1 For the purposes of this Framework, non-disclosure of information to the public may be due to the following reasons:
 - 8.1.1. Confidential information concerning obligations to customers or other counterparty relationships, under which obligations the institution must maintain the confidentiality of such information.
 - 8.1.2. Facts and circumstances concerning the balances and transactions on accounts and deposits of the Bank's customers.
 - 8.1.3. Trade secret Information whose disclosure would compromise the competitive position of the Bank.
 - 8.1.4. Inside information of a precise nature, which is not made public, relating directly or indirectly to one or more issuers or to one or more financial instruments, and which, if it were made public, would be likely to have a significant effect on the prices of those financial instruments.

IX. MAINTAINING OF CONFIDENTIALITY

- 9.1 To maintain confidentiality, Bank personnel are required to observe the following guidelines to avoid unintentional disclosure or misuse of material informational:
 - 9.1.1. Documents and files containing confidential information should be kept in a safe place with restricted access. Where files are stored digitally, then the Bank's secured electronic facilities should be used.
 - 9.1.2. Access to documents, file and information are restricted to individuals on a "need-to-know" basis and access to digital files should be by personal passwords, thumbprint or other similar methods. Where required, code names may be used for confidential

projects. Similarly lap-tops and content in lap-tops (and other mobile devices) should be well protected.

9.1.3. Confidential documents should not be read or displayed in public areas. When discarding confidential documents, they should be destroyed in a manner that they cannot be retrieved. Where extra copies of confidential material are found after meetings or conferences, they should be collected and disposed.

9.1.4. Confidential matters should not be discussed in places where the discussion may be overheard. Caution should be exercised where discussion takes place in public areas such as elevators, hallways, restaurants, bars, restrooms, airplanes or taxis. Discussions on wireless devices in public areas, arising from urgency or necessity must be conducted with care.

9.1.5. Transmission of documents by fax, email or other electronic means should be made and received under a reasonably secured condition.

9.1.6. Non-disclosure agreements should be signed with parties that require information from the Bank for specific purposes. Such purposes should be stated in the agreement and availability of information restricted to such purposes.

9.1.7. All visitors entering the Bank's premises should be limited to the designated public areas of the Bank and where access to sensitive areas are required, visitors should be accompanied by the Bank's personnel.

Every effort must be made to limit access to confidential information to only those persons who need to know the information, and such persons must be advised that the information is to be kept confidential.

X. INSIDER INFORMATION

Insider information is a non-public disclosed fact regarding the plans or conditions of a publicly traded company that could provide a financial advantage in a securities market. Insider trading is illegal when the material information has not been made public and has been traded on. This is because trading on insider information is seen as an unfair manipulation of the free market to give preference to specific parties. All Bank personnel dealing and handling public traded Customers are strictly prohibited from disclosing such confidential information or trading on such information.

XI. MARKET RUMOURS AND PUBLIC STATEMENTS

The Bank's general policy is not to comment, either affirmatively or negatively, on rumours unless they appear to contain material information, or may be expected to affect the trust and confidence on the Bank.

When a report or rumours contains material errors, the Bank will issue an announcement to deny or clarify the report or rumours, and provide sufficient supporting information so as to minimize uninformed speculation.

Only Authorized Spokespersons will respond with public statements and prior to such statements, the Bank will conduct its due diligence ensure that all public statements are appropriate.

XII. CRISIS COMMUNICATION

Where a serious and potentially damaging event, of either an operational or financial nature, which might materially and negatively affect the Bank and lead to a crisis, then the Bank shall proactively take steps to communicate with public and regulators to avert such crisis.

In a crisis situation, all communications are conducted through a team formed by the Bank's Senior Management.

XIII. OTHER PROVISIONS

9.1. This Framework will be regularly reviewed to ensure effectiveness and up-date.

9.2. Other Policies that are related to this Framework are:

- Code of Ethics
- Whistle Blowers Policy
- Social Media Policy
- Anti-Money Laundering Policy
- Corporate Governance Framework

9.3. The Risk & Compliance Department of the Bank will monitor and report to the Board Risk Committee on matters concerning this Framework.