

Business & Human Rights Resource Centre – 1/25/15

1. **Does your company have investments or operations in Myanmar or is it seriously considering investing or operating there? If so, please provide information on the nature of these investments, and which geographic areas and communities they will affect.**
 - a) *As of January 2015, we do not have any active investments in Myanmar. We have limited operations (mainly evaluating investment opportunities) with two full-time local employees, supported by several employees and consultants from our global operating companies spending considerable time in Yangon.*
 - b) *We are currently considering investing in several real estate projects; these are in due diligence and under negotiation and would involve potentially acquiring long term land leases in Yangon to develop international standard office space targeting multinational corporations and NGOs as tenants.*
 - c) *These investment opportunities are all in built-up urban areas in existing business or residential areas, currently vacant, owned by private land owners and thoroughly vetted to ensure uncontested legal ownership and no ongoing disputes with affected individuals or communities.*
 - d) *Our mission includes contributing to Myanmar's economic liberalization and reintegration into the global economy. With our investments, we will contribute to relieving the immense pressure on commercial real estate, enabling businesses to operate and facilitating job creation. We will directly create jobs through construction, and in operations after our buildings are complete, providing training in the nascent hospitality and property management sector.*
2. **Do you have policies and procedures in place to prevent your business activities or investment from contributing to human rights abuse and social conflict in Myanmar (including, for example, human rights due diligence measures)? Please specify whether these policies and procedures apply to your company in general, or specifically to your Myanmar investment. If you have human rights policies and procedures regarding investing or operating in Myanmar, are you willing to share them for posting on our website? If so, please send them as a Word or PDF file, or, if available, as a hyperlink.**
 - a) *Yes we do have such policies and procedures, developed through consultation with external advisors to provide perspective on local law and standards, and global best practices. These policies and procedures apply to our company in general as well as to our future investments. These cover areas including non-discrimination, workers' rights, land acquisition and anti-corruption.*
 - b) *Our policies are commensurate with the identified risks associated with our current business activities. We would prefer to share policies at a later date once our guidelines have been refined further based on expanded operations.*
3. **Who in your leadership is responsible for ensuring compliance with the policies and procedures in no. 2?**

Our Managing Director, who spends most of his time in Yangon
4. **If you do not yet have human rights policies and procedures in place, do you have plans to develop them? If so, what efforts are you currently engaged in or plan to engage in on this regard?**

N/A - we do have human rights policies and procedures in place.

5. **How does your company try to prevent or mitigate conflicts that affect its operations or the surrounding communities (including armed conflict, inter-communal conflict and violence, etc.)? Could you please list your policies, procedures or concrete activities in this regard, including community engagement and dialogue measures and revenue sharing agreements?**

a) *The investments currently under consideration are all located in downtown Yangon, and far from regions with a history of ethnic, inter-communal or armed conflict – those risks are limited or non-existent.*

b) *The remaining risks from our planned investments are mainly to do with individuals or entities with links to former or existing conflicts or controversial military activity, or through acquiring any disputed property.*

c) *We have a thorough vetting procedure for any prospective partners or employees. This includes:*
i. *Due diligence through our local network which includes two Yangon based law firms and other relevant stakeholders who are well-connected in real estate.*
ii. *Running background checks on all prospective partner individuals or entities through global databases such as WorldCheck, Interpol, World Bank Ineligible Firms and Individuals and the US list of Specially Designated Nationals (SDN) and Blocked Persons.*

d) *We also have due diligence policies in place specific to real estate, the area of our current focus:*
i. *We conduct thorough background checks on landowners and brokers*
ii. *We conduct an exhaustive check (e.g. legal documents, non-alertive enquiries among local stakeholders etc.) on the ownership history of properties in question to determine how current owners acquired land, and whether there are any disputes involving affected communities or individuals (whether or not legally recognized)*

While we expect our due diligence to eliminate any need for compensation to affected parties, we also have an open-door policy to receive, adjudicate and address reported grievances.

6. **Who should communities or civil society groups contact if they have questions or concerns about your investment or operations in Myanmar? Please provide their contact information.**

Communications on any matter can be sent to info@fourriversasia.com

7. **We further invite you to respond to questions specific to your industry. Does your company have policies and procedures in place to address each of the following areas? If so, please provide details:**

a. **Does your company have an anti-discrimination policy (whether based on race, gender, religion, nationality, etc.). If so, please provide details.**

Yes. We have an anti-discrimination policy for all full-time employees and consultants, prohibiting any form of discrimination or harassment, and adhering to an equal employment policy covering a range of criteria including Race, color or ethnicity, Religion or belief, Gender, Sexual orientation, National or any other defining origin including nationality or citizenship, Age, Disability and Marital status.

b. **Does your company have human rights due diligence policies and procedures, and do they extend to clients and business partners? Please provide details.**

Yes, our human rights due diligence policies and procedures extend to clients and business partners. We look to internationally recognized conventions, as relevant for our corporate scale and evolution,

such as the UN Universal Declaration of Human Rights and International Labor Organization guidelines. We commit to:

- i. Acknowledging responsibility of our employees and affiliated external parties to follow relevant aspects of our human rights guidelines when working on our behalf*
- ii. Having a clear grievance mechanism to facilitate early identification and assessment of any alleged human rights related grievances*
- iii. Addressing, as feasible, any adverse Four Rivers human rights impact that we identify or that is brought to our attention*

In real estate, local practices vary widely and there is a risk of on-site safety procedures not meeting local guidelines. We commit to paying particular attention to areas such as site safety, hours worked, and pay, as part of our due diligence on external parties prior to commencing any business partnerships or vendor selection. We also require acknowledgement of our human rights policies as a condition of engagement. We will also have a PMCM (Project Management Construction Management) company and full-time Project Director to monitor sites (including on compliance with local guidelines) once construction begins.

We also pay particular attention to ensuring that none of our consultants or contractors is involved in, or employs in our projects any forced or child labor. Our policies are consistent with revised Myanmar law on child labor which is now aligned with ILO guidelines. NRC (National Registration Card) age verification is required for all employees and external parties including subcontractors.