



Ambassador Karan Bhatia
Vice President
Senior Counsel
Global Government Affairs and Policy

GE
1299 Pennsylvania Avenue, NW
Suite 900
Washington, DC 20004

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Via Email

U.S. Department of State
2201 C Street NW
Washington, DC 20037
BurmaPublicReport@state.gov

The General Electric Company hereby submits its initial report on responsible investment in Myanmar, pursuant to OFAC General License No. 17 ("GL-17"). GE opened a representative office in Yangon, Myanmar in 2013 and now employs 12 employees. GE's activities in Myanmar principally include the sales and service of medical equipment, gas turbines for electricity generation, leased aircraft, and philanthropic initiatives.

We do not believe this activity constitutes "new investment" in Myanmar as defined by the applicable regulations. GE also has not engaged in any investment agreements with the Myanmar Oil and Gas Enterprise. However, consistent with the company's commitment to transparency, we are voluntarily submitting the attached report.

Please do not hesitate to contact me if you have any questions about our submission.

Sincerely,

A handwritten signature in black ink that reads 'Karan Bhatia'. The signature is written in a cursive style and is positioned above a solid red horizontal line.

Karan Bhatia

Attachments:

General Electric Company's Report on Responsible Investment in Myanmar
The Spirit and the Letter
Statement of Principles on Human Rights

General Electric Company's Report on Responsible Investment in Myanmar

Public Report
February 19, 2016

1. Name

General Electric Company (or “General Electric,” or “GE,” or “the Company”).

2. Acknowledgement

On behalf of General Electric, I acknowledge that this report will be made public with our signature below. We do not consider any information presented in this public report to be exempt from public disclosure under FOIA Exemption 4.

Karan Bhatia, Vice President & Senior Counsel for Global Government Affairs & Policy

3. Point of Contact

Karan Bhatia
Vice President & Senior Counsel for Global Government Affairs & Policy
General Electric Company
Karan.Bhatia@ge.com

4. Overview of GE’s Operations in Burma

Focus on Healthcare, Electricity, and Aircraft Leasing

GE has a total of 12 employees in Myanmar, all of whom are Burmese; this includes 3 new staff members who were formerly part of Alstom, whose power generation and grid businesses GE acquired in November 2015.

GE discontinued all operations in Myanmar in 1996 for policy and compliance reasons. Based on more recent advances toward democracy and changes to U.S. policy, the Company permitted its businesses to re-engage with Myanmar in 2012 and established a representative office in Yangon in May 2013. The physical location is GE International Incorporated, Chatrium Hotel Royal Lake Yangon, 40 Natmak Road, Tamwe Township, Yangon, Myanmar. Andrew Lee is GE’s Chief Country Representative. All GE businesses are now allowed to conduct business in Myanmar provided that no GE business engages in any activities prohibited under (i) U.S. law, regardless of whether U.S. jurisdiction applies, or (ii) other applicable local law.

In Myanmar, GE engages in product sales and product-related services. Most of GE’s product sales and service agreements have been concentrated in the vicinity of Yangon and Mandalay.

As detailed below, GE’s has principally been active in Myanmar to date in the healthcare, power, and aviation leasing sectors. In addition, distributors have sold a modest amount of GE Oil & Gas and Lighting products.

GE Healthcare, via its distributor Sea Lion Co. Ltd., supplies advanced imaging equipment including Magnetic Resonance (MR), Computed Tomography (CT), Cardiac Catheterization

Systems (CathLab), Digital X-rays and Ultrasound technology to the nation's biggest teaching hospitals, public hospitals and leading private hospitals. The advanced imaging systems selected by the government for the teaching hospitals will contribute to more innovative training of medical professionals. GE Healthcare has also provided several hundred medical devices to improve critical, cardiac, and maternal and infant care in Myanmar. With the installation of quality medical equipment across the country, more people in Myanmar will benefit from more accurate medical diagnosis and treatment.

GE Power is offering its innovative portfolio of power generation solutions, including distributed power solutions, to help meet the country's urgent need for additional electricity. GE Power has sold aeroderivative gas turbine technology for a natural-gas fired power plant, located in Alhone Township in Yangon, which will produce approximately 120 MW of electricity. Toyo Thai Power Corp. in Singapore, an independent power producer (IPP), will own and operate the plant and sell power to Myanma Electric Power Enterprise (MEPE). GE was also recently awarded a contract to supply two state-of-the-art gas turbines to the Myingan Power Project in central Myanmar, which is owned and operated by Singapore-based Sembcorp, operating as an IPP and selling electricity to MEPE. In addition, GE has committed to rehabilitating and repowering two gas turbines in Yangon. Finally, GE will supply two F-Class fuel-efficient gas turbines for Thaton (World Bank's sponsored project) to a Chinese firm CEEC operating as an EPC (Engineering Procurement Contractor). This project was signed between MEPE & CEEC on January 26, 2016.

GE Capital Aviation Services (GECAS) has leased several Embraer E190s to Myanmar National Airlines (MNA), the country's flag carrier, to help with the airline's fleet modernization and expansion. This modern and fuel-efficient aircraft is powered by GE's CF34-10E engines. GECAS also signed a contract in February 2014 with MNA to lease 10 Boeing 737-800 aircraft for delivery from 2015 – 2020 powered by GE fuel efficient jet engine technologies.

In addition to the forgoing activities, a GE Oil & Gas (O&G) channel partner (Smart Technical Services Co., Ltd.) will be supplying blowout preventers (BOPs) to Myanma Oil & Gas Enterprise (MOGE) for use in MOGE onshore oil & gas blocks. Delivery is expected in April/May 2016. A GE Lighting channel partner (Krislite) has also been supplying a modest amount of GE Lighting products to Myanmar.

Overall, GE's focus has been on supplying safe, efficient and sustainable products and services to meet the substantial infrastructure needs of the Myanmar people. GE's approach to operating in Myanmar has been, and will continue to be, measured, incremental, and informed by due diligence, commensurate with the size, scope and nature of our operations. GE's activities in Myanmar are in compliance with U.S. law and in keeping with the Company's human rights commitments.

Strong Commitment to Humanitarian Assistance and Capacity Building

In addition to its commitment to improving Myanmar's infrastructure and supporting the development of human capital in Myanmar, GE continues to engage in significant philanthropic and capacity-building activities.

In the healthcare sector, the GE Foundation, through its 'Developing Health Globally' program, focuses on decreasing the rate of maternal and new-born infection at Government-operated,

district-level hospitals and clinics. The Foundation is undertaking this initiative with Myanmar's Ministry of Health (MOH) and Jhpiego, an affiliate of Johns Hopkins University.

As part of a rural healthcare pilot project, GE worked with the MOH to supply training, technology, and equipment to help reduce maternal and infant mortality rates. The project included 'Rural Kit' such as handheld ultrasound units (Venue 40), infant warmers, and LED phototherapy. GE also has provided training for MOH participants in the usage of medical devices and on the delivery of healthcare as part of its biomedical engineer training program. GE has delivered \$500,000 in equipment and \$2.5 million in healthcare training (focusing on reducing infant mortality) in Myanmar to date.

GE also developed, at the government's request, a comprehensive electricity plan for Myanmar to evaluate how best to address the country's needs with available resources. The plan identified what types of power solutions would be most effective and where facilities should be located to maximize efficiency and system stability. GE has also provided a series of energy technical training programs. These services were provided free of charge.

Finally, GE launched a Myanmar Executive Leadership Program for public and private sector leaders which sends officials to either the United States or Singapore to participate in intensive training to develop leadership skills in business, government, rule of law and civil society. To date, we have trained 30 public & private leaders to our Crotonville Global Learning Center and trained more than 60 public officials by LKYS (Lee Kwan Yew School) in Myanmar and Singapore.

GE's operations in Myanmar, which to date only involve the sale of goods and services and the provision of humanitarian, health, and educational programs, do not constitute "new investment" as defined by the applicable regulations that would trigger U.S. State Department reporting obligations under OFAC General License No. 17 ("GL-17"). GE also has not engaged in any new investment activities with Myanmar Oil and Gas Enterprise (MOGE) that would require the separate MOGE reporting requirements,. The Company's decision to file this report voluntarily reflects GE's commitment to sustainability, including our commitment to the principal of transparency.

5. Human Rights, Worker Rights, Anti-Corruption, and Environmental Policies and Procedures

GE's Commitment to Sustainability

General Electric is committed to aligning our business strategy to meet societal needs, while minimizing environmental impact and advancing social development. This commitment is embedded at every level of our company and in every place we do business, including Report on Responsible Investment in Myanmar
Myanmar

The Company's global sustainability priorities are all relevant to Myanmar: 1) Social, which includes workforce development and inclusiveness, improving health, and human rights, 2) Environment, which includes resource productivity, water, and energy and climate, and 3) Governance, which includes doing business in emerging markets, promoting rule of law, and advocating integrity and compliance.

Doing business in emerging markets like Myanmar is a key element of GE's growth strategy and provides the company with opportunities to employ our expertise and technology to promote development and improved standards of living. As in other emerging markets, GE recognizes that doing business in Myanmar comes with risk. However, we believe that with planning, adequate due diligence and measured initiatives, the company can not only win business, but improve the quality of life for the people of Myanmar. GE's record of strong corporate governance, commitment to acting ethically, and philanthropic initiatives enable the Company to be a positive influence in the country as it moves toward democratic rule.

Due Diligence and Stakeholder Engagement

GE engages in rigorous transactional due diligence and engages with stakeholders on a regular basis at all levels of the Company and in all regions in which we operate. Each GE business has a Compliance Review Board responsible for:

- ensuring due diligence is conducted commensurate with the nature of a transaction's human rights risk;
- ensuring adequate grievance processes exist;
- determining appropriate responses to known human rights impairments;
- ensuring direct business partners comply with local laws and GE Supplier Expectations;
- training employees on relevant compliance programs;
- due diligence review of new business partners in terms of suitability and compliance record

Additionally, GE's regionally-based leaders are tasked with anticipating human rights issues in emerging markets and monitoring local developments that give rise to concern.

Globally, the Company's most extensive due diligence and lasting local interface arise in conjunction with the manufacturing facilities we operate in over 40 countries. By comparison, our presence in Myanmar, with just a 12-person office focusing on sales and service, is much smaller, with correspondingly less impact on the environment and worker or human rights. Nonetheless, addressing the risks posed by any country at Myanmar's level of political, social and economic development requires that we implement appropriate practices to ensure that GE conducts business in Myanmar in a way that respects human rights and the environment and remains compliant with our anti-corruption principles. These activities include the following:

- GE has a rigorous, company-wide trade controls program that ensures *inter alia* strict compliance with regulations governing interactions with Specially Designated Nationals. This program includes background check procedures, including acquiring personal information from our potential partners and employees. Except for GE's healthcare business, personal information collated on our potential partners and employees are sent to the head of compliance at the ASEAN office in Bangkok Thailand for review.
- To ensure headquarters-level oversight and due diligence, numerous GE officials have conducted trips to the country, starting in 2013 and continuing with the most recent trip in November 2015. GE's Chairman, Vice Chairman, General Counsel, Senior Counsel for Labor and Employment, President of the GE Foundation, as well as senior government relations executives, have traveled to Myanmar to participate in a series of meetings with NGO leaders, government officials, UN officials and the U.S. Ambassador. These

- individuals have met with officials from various political parties and NGOs, including the International Labor Organization, the Myanmar Center for Responsible Business, as well as various healthcare NGOs and rule of law advocates. During their visits, they asked the government of Myanmar tough questions about their commitment to reforms, listened, and shared best practices. These meetings have helped the Company understand the country context and potential risks to human rights of our doing business in the country, and structure its business in a way that is most beneficial for the people of Myanmar.
- While GE's Oil & Gas business has had limited involvement in Myanmar to date, the GE Foundation commissioned a Human Rights Impact Assessment to guide the Company's future interaction with the country's extractive sector. The Assessment, which was prepared by the Institute for Human Rights and Business, applies the UN Guiding Principles to facilitate sustainable engagement with business partners and civil society in Myanmar. We have made the report public to highlight for all in the Oil & Gas sector the human rights issues that attend extractive sector operations in Myanmar. It is available at:

<http://www.myanmar-responsiblebusiness.org/pdf/SWIA/Oil-Gas/00-Myanmar-Oil-and-Gas-Sector-Wide-Assessment.pdf>

The Environment, Health, and Safety

GE is committed to having a world-class program for managing environmental, health and safety (EHS) risks. GE's commitment begins with its Board of Directors, which regularly reviews the Company's environmental and safety performance. Under the leadership of GE's Vice President for EHS, all of our operations, including our manufacturing and service operations, are subject to the Company's Environmental, Health and Safety (EHS) policy and EHS management system.

GE has learned that delivering on EHS performance requires holding site and service managers accountable for the safety and environmental integrity of their operations, real-time tracking of EHS data and regular reviews, appropriate training, and seeking periodic anonymous feedback on EHS issues from employees. GE's customers often conduct high-risk operations in challenging environments and the Company frequently offers our EHS systems to customers and third parties to ensure that we keep people and the environment safe.

While the company's footprint in Myanmar – and potential environmental impact – is more limited than in many other countries, all of GE's global policies related to the environment, as well as health and safety, apply to our operations in Myanmar. GE employees in Myanmar have received training in environmental and fire safety standards and GE's EHS team has inspected our facilities in Myanmar, which at this point in time consist solely of an office suite in the Chatrium Hotel. GE also makes an effort to keep its employees informed and well versed with these policies by conducting internal e-learning programs.

Human Rights, Worker Rights, and Grievance Procedures

GE concluded in 2006 that high growth rates in emerging markets relative to developed markets would mean the company would be increasingly operating in countries where human rights are under pressure. To help us meet the challenge of protecting human rights and doing business

sustainably in these countries, GE joined the Business Leaders Initiative on Human Rights, adopted a Statement of Principles on Human Rights, joined the UN Global Compact, and adopted Implementing Principles on Human Rights. We aim to bring our global principles, as well as our practical experience of operating in countries with weak human rights protections and weak rule of law, to all GE businesses engaged in Myanmar.

GE's Statement of Principles on Human Rights is attached to this report and also available here:

http://www.ge.com/files_citizenship/pdf/ge_statement_principles_human_rights.pdf

Among other commitments, this Statement outlines GE's determination to apply the broad principles contained in the Universal Declaration of Human Rights within our businesses by promoting respect for human rights through our employees, through our interactions with direct business partners, in our products, and in the communities where we operate. Actively applying these principles is especially critical in a country like Myanmar which has a history of human rights violations and which is in the midst of dramatic political and social change. Implementing the principles in practice requires integrating due diligence, audit protocols, reporting and the use of grievance systems into our commercial operations.

At the Corporate level, responsibility for human rights strategy rests with the Executive Counsel for Labor & Employment, in coordination with the Vice President for Global Government Affairs & Policy, and the Vice President for Environmental Health & Safety. The GE Foundation, through its President and the Company's Chief Diversity Officer, also plays a role in helping fund philanthropic programs focused on human rights and which align with Company and Foundation priorities. Additionally, at each GE business, a Human Rights champion has been designated by the respective General Counsels of the GE businesses in a structure chaired by the Senior Counsel of Labor and Employment Law.

With respect to worker rights specifically, in Myanmar and in all countries in which GE operates, the Company respects employees' right to freedom of association and respects employees' rights to bargain collectively consistent with local country law. While our current staffing needs in Myanmar are minimal, GE is committed to hiring and retaining superior local talent, and in investing in our employees' long-term development.

GE's extensive ombudsperson process serves as a mechanism for individuals to ask questions and report grievances and integrity concerns without fear of retaliation. Ombudsperson coverage is provided in Myanmar, as it is for every business and country in which GE operates. Ombudspersons communicate with their employees formally through company policies, Employment Contracts, Employee Handbooks and informally through associations and social media. We also require ombudspersons to understand the culture and business environment of their locations.

Anti-Corruption and Compliance

GE infuses compliance and governance into every aspect of its business. We are committed to maintaining a world-class compliance culture in every GE business, everywhere we operate around the world. A key challenge for a company of GE's size, in conducting business across a

diverse global platform, is ensuring that every employee at every site – including GE’s small office in Myanmar – conducts business ethically.

At the heart of GE’s Integrity & Compliance program is *The Spirit & The Letter*, a code of conduct and set of policies that cover our integrity commitments on critical subjects and risk areas. *The Spirit & The Letter* is attached to this report and also available on our website in 32 languages:

<http://www.gesustainability.com/how-ge-works/integrity-compliance/the-spirit-the-letter/>

GE has long taken a leading role in pushing for transparency and integrity in the global marketplace. GE’s policy against improper payments in business transactions is a key element of *The Spirit & The Letter* and represents a core belief in how we do business. Recent recognition speaks to the strength and effectiveness of GE’s compliance operations. In 2015, GE was proud to be recognized by *Ethisphere* magazine as one of the World’s Most Ethical Companies for the ninth straight year.

GE’s commitment to perform with integrity is instilled in every employee as a nonnegotiable expectation of behavior. Our employees in Myanmar and around the globe can access *The Spirit & The Letter* in an interactive eBook format on GE’s intranet website, together with additional resources including a database of frequently asked questions, compliance stories, videos and links to online training.

GE is keenly aware of the challenge of ensuring our global compliance policies are strictly followed in Myanmar given the country’s high level of corruption. Getting basic things done in the country can be difficult for an ethical company committed to avoiding improper payments. In Myanmar, as elsewhere, we remain fundamentally committed to taking the ethical and legally compliant path, even if that path takes longer or is more costly.

GE currently seeks to sell its healthcare, oil and gas, energy management, power and water products in Myanmar through locally appointed distributors. GE conducts numerous face-to-face, as well as online anti-corruption and compliance trainings for its own employees and those of its distributors annually. GE also requires its distributors and their employees to declare in writing that they do not engage in bribery or corruption in Myanmar on a periodic basis when acting as GE’s distributor.

GE conducted an in-depth compliance training program for all our existing, new staff and partners in Myanmar in December 2015, making sure that all employees were familiar with the company’s standards of operation on sanctions, SDNs and ITC-related topics.

In addition to acting ethically, GE is committed to helping improve the rule of law in the country. For example, the GE Foundation supports an undertaking of the International Senior Lawyers Project to train civil society advisors on rule-of-law concepts. The Foundation has also supported training in international best practices on public procurement and commercial law for Myanmar Government officials.

Globally, GE continues to take a leadership role in the B20 Working Group on Improving Transparency and Anticorruption, working to foster cooperation among business communities

and governments in G20 countries in the global fight against corruption. GE also regularly raises rule-of-law issues with regional bodies, such as the Americas Competitiveness Forum and the Asia-Pacific Economic Forum (APEC), to encourage regulatory reform and harmonization, and the establishment of regional programs to promote rule of law.

6. Arrangements with Security Service Providers

Globally, security providers used by GE must observe the policies of the Company regarding ethical conduct and human rights, the law of the country in which they operate, industry best practices, and promote the observance of international humanitarian law. It is GE policy that contracted security providers also exercise restraint in a manner consistent with international guidelines regarding the use of force, including the UN Principles on the Use of Force and Firearms by Law Enforcement Officials and the UN Code of Conduct for Law Enforcement Officials, as well as with emerging best practices. GE requires that contracted security providers properly investigate credible allegations of abuse. The company also requires providers to investigate the use of physical force and to report such incidents to the appropriate GE Business Unit Security Manager.

7. Transparency

There have been no payments made by GE or on its behalf valued over \$10,000 during the reporting year to any Government of Burma entity and/or any sub-national or administrative governmental entity or non-state group that possesses or claims to possess governmental authority over the submitter's new investment activities in Burma.

9. Point of Contact for Person Preparing this Report

Orit Frenkel
Senior Manager for Global Government Affairs & Policy – Asia
orit.frenkel@ge.com
1-202-637-4273

10. Military Communication

There has been no written or telephone communication with the armed forces of Burma and/or other armed groups related to the GE's investments in Burma.

11. Risk Prevention and Mitigation

As discussed earlier in the report, GE recognizes the significant risk factors present in our decision to operate in Myanmar. Risk factors include high-levels of corruption, human and worker rights violations, and in some sectors, environmental degradation. Around the world, GE operates in a number of developing countries with similar challenges. Our experience elsewhere has informed our careful and incremental approach to doing business in Myanmar. Now that we've been

operating in the country for several years, GE has also gained country-specific knowledge from our commercial sales and philanthropic activities to support the rule of law and train Burmese leaders. This knowledge has helped the Company better identify risks and potential negative impacts. Our rich mitigation efforts are discussed above.

Additionally, every business transaction that is conducted in Burma by GE undergoes a background check. GE runs names, passport numbers, dates of birth and other personal information through the International Trade Controls Team as well as the industry to ensure that potential business partners are not precluded by sanctions. GE also checks to ensure that there are no reputation issues so as to avoid any potential future litigation. In the past, we have rejected potential partners that have not met our clearance standards.