

# Myanmar Foreign Investment Tracking Project

## Response from Apollo Towers

Sector: Information and communications technology  
Region of HQ: USA

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.*  
Apollo Towers has a very active presence in Myanmar, currently building over 1000 cellphone towers throughout Myanmar – a current investment of over US\$150 million, with more to come.
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.* Attached is our policy that all employees, consultants, suppliers and partners MUST sign. There is zero-tolerance enforcement.
3. *Who in your leadership is responsible for ensuring compliance with the policies and procedures in no. 2?*  
Our CEO, Global PMO and Tillman Holdings ensure 100% compliance.
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
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?*  
At this point, we have not been building in areas of armed conflict.
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.*  
[Bill.pollack@apollo-towers.com](mailto:Bill.pollack@apollo-towers.com) (Global PMO); [philippe.luxcey@apollo-towers.com](mailto:philippe.luxcey@apollo-towers.com) (CEO); [sanjiv.ahuja@way4orth.com](mailto:sanjiv.ahuja@way4orth.com) (Tillman Holdings Chairman)
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. *Freedom of association and collective bargaining* -- no formal written policy
  - b. *Living wages* – internally, this is a requirement and assumed moral obligation of the company
  - c. *Workplace health and safety* – our industry is tightly regulated, due to the dangers inherent to tower building, and we have detailed procedures for worker health and safety, that our aggressively monitored and enforced
  - d. *Child labour* – same as above
  - e. *Forced labour* – as above, including 100% flow down to our contractors, and the usual “zero tolerance”
  - f. *Anti-discrimination (whether based on race, gender, religion, nationality, etc.)* – again, this is covered in our global employment policy. We enforce provisions of US labor law and FCPA, and report as required to the US State Department
  - g. *Environment* – in our construction projects, environment considerations enter into our design and construction policies

- h. Land rights* – we have leased over 1000 parcels of land (or rooftops), always in full compliance with local laws, government permitting, and Myanmar regulations. No construction begins until all approvals and consents are in place.
- i. Relocation* -- we relocation is ever required