



**MPRL E&P Pte Ltd.**

# ANTI-BRIBERY & CORRUPTION POLICY

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**DOCUMENT TITLE: ANTI-BRIBERY AND CORRUPTION POLICY**

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**APPROVED BY: COUNTRY MANAGER**

## **OBJECTIVES**

MPRL E&P is committed to conducting business in accordance with all applicable laws, rules and regulations, and to the highest ethical standards. We recognize that directors, employees and other personnel including, but not limited to, agents, contractors, consultants, and secondees who work on behalf of MPRL E&P can be subjected to corrupt behaviors that involve offers of, or requests for bribes, facilitation payments or grease payments.

To achieve this objective:

- MPRL E&P has a zero tolerance approach to corruption, meaning the giving or receiving of bribes in any form either directly or by those who work on behalf of MPRL E&P is prohibited and will not be tolerated.
- MPRL E&P will not engage in corrupt business practices;
- MPRL E&P will, at a minimum, comply with all applicable laws, regulations and standards which include, but not be limited to, the Myanmar Anti-Corruption Law, the Tenth Principle of the UN Global Compact, and the UK Bribery Act all of which are applicable to MPRL E&P, our employees and other personnel.
- MPRL E&P is a member of the Myanmar Extractive Industries Transparency Initiative (MEITI) promoting improved governance in resource-rich countries by requiring verification and publication of company payments to, and government revenues from, oil, gas and mining.

## **APPLICABILITY**

This policy is applicable to all MPRL E&P directors, employees, consultants, contractors, agents, advisors and other representatives working in operated assets and offices.

Breach of the MPRL E&P Anti-Bribery and Corruption Policy may result in disciplinary action, up to and including dismissal. Contracted personnel who fail to comply with this policy may have their contract terminated, not renewed, or be subject to other appropriate actions. MPRL E&P reserves the right to amend or update this policy as required from time to time.



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# ANTI-BRIBERY & CORRUPTION POLICY

CONTINUED

## **COMMITMENT**

To achieve this objective, MPRL E&P employees and other personnel shall commit to the following:

- Shall not offer, promise or make any payment or transfer anything of value, including the provision of any service, money, gift or hospitality or any other advantage, to anybody for the purpose of obtaining or retaining business.
- Shall not request, agree to receive or accept anything of value, including provision of any service, money, gift or hospitality or any other advantage for an improper purpose or improper performance. To further reiterate, accepting invitations of a personal nature is prohibited for meals or entertainment from any contractor whose services are being offered in a current tender process or who may try to gain influence for a tender which is imminent. In special cases where a gift is made due to a religious or cultural celebration, all gifts offered and received shall be recorded by the Administration Department. The Administration Department shall keep a record of every gift received.
- MPRL E&P will not make political donations to any political party, politician or candidate for public office.
- The Compliance Department shall improve employees and other personnel's awareness of relevant bribery laws in Myanmar and initiate anti-bribery training, which will cover corruption risks, and situations where they may be subject to unethical approaches.
- Politely refuse a facilitation payment or requested for/offered a bribe, while carrying out duties.
- Immediately report any suspected or actual violation of this policy. The report may be made to the Compliance Department or via the whistleblowing policy. Employees and other personnel shall not suffer any form of retaliation, reprisal or detriment from MPRL E&P for raising a concern or reporting in good faith a violation of this policy. In addition employees and other personnel shall not suffer any form of reprisal from MPRL E&P for refusing to make a corrupt payment.
- The Chief Compliance Officer and/or Assistant Chief Compliance Officer will determine warranting actions. Any action taken will involve informing Senior Management and concerned Head of Department.
- Where possible and when required, MPRL E&P employees and other personnel shall exert influence and share knowledge with contractors and Joint Venture partners to implement adequate policies and procedures to prevent bribery, and promote ethical standards throughout the supply chain.

## **RESPONSIBILITIES**

The Chief Compliance Officer and/or Assistant Chief Compliance Officer are the main points of contact regarding compliance, with responsibility for day-to-day administration and oversight of this policy. The Material and Logistics Manager from the Administration Department will assist with record keeping.

## **REVIEW, MONITORING AND REPORTING**

This policy will be reviewed annually to ensure that it is aligned with changes in our business and external environment, including changes in the national context and legal requirements. MPRL E&P executive management is accountable for the implementation of this policy. Training will be provided to MPRL E&P staff and contractors to better understand ethical practices against corruption and bribery. The Chief Compliance Officer and/or Assistant Chief Compliance Officer will conduct the appropriate level of due diligence to evaluate potential compliance risks to ensure that MPRL E&P only enters into a business relationship with reputable and qualified individuals and firms. Audits of sites, operating units, and contractors may be conducted internally by MPRL E&P or externally by retained third parties. Audit documentation shall include performance improvement action plans and ensure that requirements of this Policy and related procedures are met. Further assistance will be obtained from professional and external organizations to provide guidance and support when needed.