



**MPRL E&P Pte Ltd.**

Organisational  
**CODE** of  
**Conduct**  
**2019**



VERSION. 01  
Organisational  
**CODE** of **Conduct**

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## Contents

1. Our Organisational Code of Conduct.....	1
2. Introduction .....	1
3. Our Mission, Vision & Values .....	2
3.1 Our Mission.....	2
3.2 Our Vision.....	2
3.3 Our Values.....	2
3.3.1 Honesty and Integrity.....	2
3.3.2 Social Responsibility .....	2
3.3.3 Results Focused.....	3
3.3.4 Employee Empowerment.....	3
4. Code of Ethics of MPRL E&P Group of Companies .....	3
5. Occupational Health & Safety, and Environmental Performance.....	3
5.1 Safe and Healthy Work Place.....	4
5.2 Respect for the Environment.....	4
5.3 Applicability.....	4
6. Commitments as a Responsible Investor .....	5
6.1 Corporate Social Responsibility Policy .....	5
6.2 Community Investment .....	5
6.3 Project Related Land Acquisition .....	5
6.4 Applicability.....	6
7. Human Rights .....	6
8. Anti-Bribery and Corruption .....	9
8.1 Gifts, Entertainment and Hospitality .....	10
8.2 Facilitation Payments.....	10
8.3 Contributions and Donations.....	10
8.4 Political Activity.....	11
8.5 Travel Expenses for Public Officials.....	11
9. Raising and Reporting Your Concerns .....	12
10. Avoiding Conflict of Interest .....	15
11. Keeping Accurate Business Records & Confidentiality.....	17
12. Compliance of the Code, Other Policies, Instructions & Office Orders .....	18
13. Implementation, Review, Monitoring and Reporting .....	21

<b>DOCUMENT NO:</b>	MPRL E&P/COM/001/2019/01
<b>DOCUMENT TITLE:</b>	Organisational Code of Conduct
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<b>APPROVED BY:</b>	Senior Management of MPRL E&P Pte Ltd.

## 1. Our Organisational Code of Conduct

Our Organisational Code of Conduct ("the Code") is published as a set of guidelines intended to articulate our primary ethical attitude and compliance to all applicable laws and regulations.

The Code is also intended for all employees and all representatives of the organisation, including directors, executives, managers, consultants, officers, supervisors, staff, vendors, suppliers, partners, and independent contractors, who are involved in our business relationships.

## 2. Introduction

During the last two decades, MPRL E&P has established a reputation of conducting business with honesty and integrity. We are proud of our achievements and believe our continued success is only possible because of the people we work with.

We require that all personnel involved in our business relationship understand and strictly follow the Code while doing their jobs for MPRL E&P.

It is the responsibility of everyone, who has a relationship with our business in any capacity, to comply with the principles of the Code, as amended from time to time.

### 3. Our Mission, Vision & Values

#### 3.1 *Our Mission*

Our mission is to improve livelihoods by being at the forefront of providing energy to drive progress in the nation.

At MPRL E&P we conduct business along the highest standards of ethics, legitimacy and transparency, guided by a clear sense of social and environmental responsibility. We believe the growth of our organisation is dependent on the empowerment of our employees. We strive to develop a thriving environment ensuring employees become involved in a process of continuous improvement.

#### 3.2 *Our Vision*

To be a leading upstream exploration and production company in the oil and gas sector of the Asia-Pacific region through our performance, people, and partnerships.

#### 3.3 *Our Values*

MPRL E&P promotes the following values to all stakeholders in order to achieve the performance needed to be the leading upstream exploration and production company in Myanmar.

##### 3.3.1 *Honesty and Integrity*

Working with honesty and integrity for the people we work with and in the communities where we operate.

##### 3.3.2 *Social Responsibility*

Endeavoring to promote sustainable development across the company's activities through dialogue and engagement enabling the creation of robust partnerships with our employees, local communities, business partners, and government.

### **3.3.3 Results Focused**

Having a strong sense of focus on results whereby driving tasks and projects through to completion with the flexibility to adapt to changing situations.

### **3.3.4 Employee Empowerment**

Committing to positively encouraging the development of employees through training within an environment that promotes capacity building opportunities and fostering new talent.

## **4. Code of Ethics of MPRL E&P Group of Companies**

As MPRL E&P is the flagship company of MPRL E&P Group of Companies, all employees, including directors, executives, managers, consultants, officers, supervisors and staff who are involved in MPRL E&P's business will comply with the Code of Ethics of MPRL E&P Group of Companies ("Code of Ethics") which is distributed to all departments of MPRL E&P.

## **5. Occupational Health & Safety, and Environmental Performance**

As we conduct business along the highest standards of ethics, legitimacy and transparency, guided by a clear sense of environmental responsibility, our [Occupational Health & Safety Policy](#) and [Environmental Policy](#) influence how we operate in environmentally responsible ways and how we protect people and communities related to our operations.

Our Occupational Health & Safety Management System and Environmental Management Plan are fundamental to our business and applicable to all areas of our operations in order to create a safe and healthy working environment with minimal negative impact on the environment whereby everyone is responsible for working safely and protecting negative impact on the environment.



### **5.1 Safe and Healthy Work Place**

We are committed to continuously improving our occupational health & safety (OHS) performance. In addition, we strive to embed a safety-first culture consistent with our fundamental goals, as set forth in our Occupational [Health & Safety Policy](#), which include:

- Zero accidents
- No harm to people

### **5.2 Respect for the Environment**

We are committed to demonstrating appropriate and sincere respect for the environment as set forth in our [Environmental Policy](#), particularly for the prevention of any accidental loss of resources or assets likely to have an impact on the environment, company employees, and communities located in the areas where we operate.

In addition, we focus on enabling business operations to be performed in an environmentally responsible manner and aim to:

- Minimize environmental impact
- Promote a positive environmental stewardship culture.

### **5.3 Applicability**

We expect active participation in achieving our occupational health & safety (OHS) performance and environmental performance goals and commitments by all employees and managers regardless of corporate hierarchy, partners, contractors, and/or suppliers who individually and collectively are responsible for performance across the business value chain.

Breach of our Occupational [Health & Safety Policy](#) and [Environmental 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. We reserve the right to amend or update this policy as required from time to time.

## 6. Commitments as a Responsible Investor

We are committed to being a responsible investor in the long-term development of the host nation by conducting business operations to the highest standards.

Our goal is to be honest and conduct business with integrity with the people we work with, which can include, but are not limited to, local communities, business partners, and governments, and to maintain respect for cultural, national, and religious diversity.

### 6.1 *Corporate Social Responsibility Policy*

We work with our key stakeholders in the community according to the [Corporate Social Responsibility Policy](#) to ensure a responsible and sustainable business that encourages partnerships to address challenges together. Our work activities are carried out in sustainable manner. We build and maintain mutually beneficial relationships with host communities and contribute to their sustainable development through active engagement, dialogue and community investment initiatives.

### 6.2 *Community Investment*

We are committed to addressing business risks and balancing community needs through long-term investment activities, as set forth in our [Community Investment Policy](#), which provides value and meaningful impact to the business and community.

Our investment focuses on projects that address the impact of our activities as well as development issues within the surrounding communities delivering lasting social, economic, and environmental returns for both the host communities and governments.

### 6.3 *Project Related Land Acquisition*

We are committed to minimizing business risks and adverse socio-economic impact on primary stakeholders as a result of project related land acquisition.

The objectives of the Land Acquisition Policy are:

- To establish a proper land acquisition process in the company based on concerns over the land aspects of the business operations;
- To ensure that a fair and transparent process is abided by for project related land acquisition in recognition of the importance of land rights to the communities living near our operations; and
- To promote best practices in the land acquisition process for business purposes.

To achieve these objectives:

- Ensure timely disclosure of information about the proposed project, planning and its likely adverse impacts concerned with land use through consultations and discussions with communities.
- Avoid situations that will lead to involuntary resettlement.
- However, when unavoidable, all people affected by the operations will be fully and fairly compensated for affected assets in accordance and collaboration with government authorities and prevailing laws.

#### **6.4 Applicability**

We expect active participation in achieving our goals and commitments by all employees and managers regardless of corporate hierarchy, partners, contractors, and/or suppliers who individually and collectively are responsible for performance across the business value chain.

Breach of our [Corporate Social Responsibility Policy](#), [Community Investment Policy](#), and [Land Acquisition 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.

## **7. Human Rights**

We aim to conduct business operations to the highest standard of ethics respecting and protecting all internationally recognized Human Rights. We are committed to protecting and promoting Human Rights by coordinating with all

stakeholders within our sphere of influence in all projects undertaken by the company.

We are a signatory of the UN Global Compact, and support the ten principles set out in this framework on human rights, labor, environment and anti-corruption. We continuously monitor and address the environmental impacts of our business operations, and strive to create positive impacts through engagement and CSR programs.

This Human Rights Policy is applicable to every aspect of our operations when acknowledging the rights of our employees and the rights of local communities.

### Community Rights:

MPRL E&P strongly encourages employees, partners, contractors, Non-Governmental Organisations and governmental bodies to address the rights of communities surrounding our operations, through active engagement and dialogue:

- We actively conduct continuous community consultations and assessments to identify and address the needs and concerns of the communities surrounding our operations;
- We recognize and respect the culture and religious rights of indigenous peoples, as well as the practice of their traditions and customs; and
- We strive to increase communities' rights to land, livelihoods, water resources, infrastructure, and education and health services, highlighting our commitment to promote community empowerment and improvement through sustainable development.



### Employee Rights:

- We provide a safe, secure, and worker friendly environment;
- We are an equal opportunity employer;
- We positively stimulate professional and personal growth of our employees through the promotion of creativity and teamwork;
- We encourage a healthy lifestyle by raising health-related awareness and practices among employees;
- We do not use any forced, trafficked or compulsory labor;
- We do not discriminate against race, religion, gender, age, sexual orientation, nationality or ethnicity; and
- All employees have the right to join or form a labour organisation, where such rights are recognized by law.

We expect active participation in achieving our human rights goals and commitments by all employees and managers regardless of corporate hierarchy, contractor, and/or suppliers who individually and collectively are responsible for performance across the business value chain. Anyone who has information on human rights abuses committed by the company's stakeholders can report through the company's Whistleblowing Policy.

Breach of our [Human Rights 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.

## 8. Anti-Bribery and Corruption

We are 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, vendors, consultants, and secondees who work on behalf of us can be subjected to corrupt behaviors that involve offers of, or requests for bribes, facilitation payments or grease payments.

### **To achieve our objective:**

- We have a zero tolerance approach to corruption, meaning the giving or receiving of bribes in any form either directly or indirectly by those who work on behalf of us is prohibited and will not be tolerated.
- We will not engage in corrupt business practices.
- We will, at a minimum, comply with all applicable laws, regulations and standards which include, but are not limited to, the Myanmar Anti-Corruption Law, the Tenth Principle of the UN Global Compact, the US Foreign Corrupt Practices Act and the UK Bribery Act all of which are applicable to us, its employees and other personnel who work on behalf of MPRL E&P.
- We are 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.

Thus, we 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.

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

Breach of our [Anti-Bribery and Corruption Policy](#) ("ABC Policy") by MPRL E&P employees may result in disciplinary action, up to and including dismissal and be subject to other appropriate actions according to civil and criminal laws. Contracted personnel who fail to comply with this policy may have their contract terminated, not renewed, or be subject to other appropriate actions according to

civil and criminal laws. MPRL E&P reserves the right to amend or update this policy as required from time to time.

### **8.1 *Gifts, Entertainment and Hospitality***

According to our ABC Policy, we do not prohibit giving or receiving gifts, entertainment and hospitality to or from Third Parties for the purpose of maintaining a good business relationship (bona fide and justifiable business purpose) provided that they are reasonable and customary, and within applicable legal restrictions of our operated area and approved by Senior Management in consultation with the Chief Compliance Officer ("CCO").

However, MPRL E&P staff are prohibited from accepting or giving gifts or entertainment to/from a third party in the following circumstances:

- it is made with the intention of influencing a Third Party to obtain or retain business, to gain or reward a business advantage or favours or benefits;
- it includes cash or in kind of cash equivalent ; and
- it is of an inappropriate type and value exceeding applicable legal restrictions of our operated area and given at an inappropriate time (e.g. during a tender process).

### **8.2 *Facilitation Payments***

Facilitation payments are prohibited, provided that the safety of our employees is of primary concern in all our operations, if the facilitation payment is being extorted or you are being coerced to pay it and your safety or liberty is under threat or you feel you have no alternative, then pay the facilitation payment and report this to CCO or Asst. Chief Compliance Officer ("ACCO") through your line manager as soon as possible. CCO or ACCO will take appropriate action and report to Senior Management.

### **8.3 *Contributions and Donations***

Political Donations or Contributions; MPRL E&P will not make political donations or contributions to any political party, politician or candidate for public office. Also employees are prohibited to make such political donations or contributions on behalf of MPRL E&P provided that this



prohibition is not intended to their personal contributions or donations on their own behalf.

Donations or Charitable Contributions; MPRL E&P may make charitable contributions or sponsorships to some events and activities which may be related to public interest or benefits provided that prior approval of Senior Management in consultation with CCO is received and comply with legal and ethical local laws and practices. Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

#### **8.4 *Political Activity***

MPRL E&P will neither take part in any activity of political parties nor take place in any form of political activity during working hours or on company premises or in business-operated areas. However, upon legitimate business reason and prior approval of Senior Management in consultation with CCO, it is permitted.

#### **8.5 *Travel Expenses for Public Officials***

Travel Expenses for Public Officials must be related directly to the execution or performance of a contract, or promotion, demonstration, explanation of the MPRL E&P services or operations with a government, government agency, or government-owned or government-controlled enterprise, and which will be incurred upon prior approval of Senior Management in consultation with CCO only and which should only be bona fide, reasonable and documented expenses.

## 9. Raising and Reporting Your Concerns

If you have any concerns that are in the public interest, you must report immediately as per our Whistleblowing Policy.

Concerns raised in the public interest may relate, but not be limited, to:

- Breach of MPRL E&P policies
- Failure to comply with legal obligations
- Financial malpractice
- Misuse of company properties or information
- Unethical behavior or improper conduct
- Harassment
- Willful negligence or attempt to conceal information relating to any of the above

To achieve our objective, we:

- **Encourage** those working at MPRL E&P to report suspected wrongdoing as soon as possible, in the knowledge that the concerns will be taken seriously and promptly investigated as appropriate.
- **Provide guidance** on how to raise concerns.
- Assure that all reports will be treated in a **strictly confidential manner** and that reports can be made anonymous, if desired.
- Reassure those raising concerns that they are **able to raise concerns** in the public interest **without fear of reprisals**, even if they turn out to be mistaken.

Whom do they contact?

Can they go to someone other than their boss?

Seeking Advice or Reporting; If there is a concern about a wrong doing or an unethical behavior within the organisation, the employee may seek advice from or discuss with or report to the respective supervisor or head of department (HoD) or any appropriate member(s) of the Whistleblowing Review Committee (WBRC).

The Whistleblowing Review Committee (WBRC) is comprised of;

- Asst. Chief Compliance Officer (ACCO), [zaw.lwin@mprlexp.com](mailto:zaw.lwin@mprlexp.com)
- Head of Internal Audit (HIA), [myint.m.swe@mprlexp.com](mailto:myint.m.swe@mprlexp.com)
- Corporate Affairs Manager (CAM), [kyisin.h.aung@mprlexp.com](mailto:kyisin.h.aung@mprlexp.com)

Can they report a concern anonymously?

Anonymous Reports; an employee who wishes to report anonymously will have to send the report to a member of the Whistleblowing Review Committee through the postal mail service or with personal emails, preferably with email addresses that do not include the individual's name.

What will happen when they report a concern?  
What is the process?

Review and Investigation; if the issue concerns another policy, reference to the appropriate policy will be made or if the issue does not concern another policy, a Whistleblowing Report Form will have to be prepared and submitted to the WBRC.

After reviewing the Whistleblowing Report Form and case, and if no further investigation is required, the WBRC, the Line Manager, and the Whistle Blower will have a discussion and the case will be resolved.

If an investigation is required, we are committed to investigating and resolving allegations of wrongdoing, misconduct, misbehaviors or misuse within the company, which may affect employees or the company's properties and reputation. We are committed to a fair and discreet process to investigate reports of suspected wrongdoing within the organisation and take corrective action where necessary.

Corrective Action & Feedback; at the end of the case, Line Management will take corrective action, if any, based on the instruction received from Senior Management. Feedback will be given to the whistleblower by the Line Management and/or the WBRC. If no corrective action is taken, only feedback will be given to the whistleblower and the case will be closed.



Is there any promise for Non-Retaliation to the Whistleblower?

Non-Retaliation Promise; We will provide all reasonable protection for employees who raise concerns in the public interest, regardless of whether or not the concern raised is upheld.

We prohibit retaliation against a Whistleblower, who raises a concern, and he or she will not be at risk of losing his or her job or suffer any detriment (such as a reprisal or victimization).

MPRL E&P will reasonably support both the employee raising a concern as well as to any employee against whom allegations have been made under this policy. However, this assurance will not be extended to any employee who maliciously raises a matter that is known to be untrue.

No employee is permitted to engage in retaliation, retribution, or any form of harassment against another employee for reporting compliance-related concerns. Any retribution, retaliation, or harassment will be met with disciplinary action.

## 10. Avoiding Conflict of Interest

Conflict of interest is a situation in which a person or organisation is involved in multiple interests, financial or otherwise, one of which could possibly corrupt the motivation or decision-making of that individual or organisation.

A conflict of interest exists when your personal interests interfere in any way with the best interests of MPRL E&P.

If an outside interest is substantial enough to impact your judgment or in any way interfere with your duty to act in the best interest of MPRL E&P, you have a **conflict**.



Even if you are certain that your judgment will not in any way be affected by an outside interest, if others might reasonably think the interest is substantial, the **appearance of a conflict** may exist.

The duties of loyalty and care: as we conduct business to the highest standards of ethics, legitimacy and transparency; all employees, managers and directors of MPRL E&P, regardless of corporate hierarchy, have affirmative:-

- Duty of loyalty
- Duty of care

to MPRL E&P.

*The duty of loyalty;* is the obligation to give primacy to the interests of MPRL E&P rather than personal concerns to avoid self-dealing at the company's expense.

*The duty of care;* is to act in good faith, in a manner which is reasonably believed to be in the best interests of MPRL E&P.

Together, the duties of loyalty and care frame the requirements for proper conduct of our business affairs and avoidance of conflicts of interest.

Disclosure of Conflict of Interest;

Any conflict of interest situations must be disclosed immediately in writing, as per the prescribed form, to the Chief Compliance Officer (CCO) or Whistleblowing Review Committee (WBRC) by all directors, managers, officers, supervisors, and employees through your superior or HOD (if any).

**Your Duties**

- All employees and relevant persons;
- commit to identify, disclose, manage and monitor conflicts of interest
  - shall complete the *Conflict of Interest Disclosure Form* an annual basis, disclosing financial, personal, and other interests and relationships that may present a conflict of interest

Although we cannot list every conceivable conflict, the following are some examples that illustrate actual or apparent conflicts of interest that must be disclosed.

Substantial Interest	Example
It is an economic interest that could, or might reasonably be thought to, influence judgment or action. An investment representing more than 1% of the stock of a business/company.	Purchase, sell or lease real estate or other facilities that you know or have reason to know that the company may be interested in, or may need in the future

Affiliations in Other Businesses; you or your immediate family members own a Substantial Interest in, or serve as an employee, officer, director or partner with any entity which does or seeks to do business or enters into a transaction with MPRL E&P or competitor of MPRL E&P, he or she shall disclose that interest and refrain from participation in MPRL E&P's business dealings with that party.

Misappropriation of Corporate Opportunities; if you are in a position where access to MPRL E&P's proprietary information may materially influence his or her decisions in another party engaged in business or competition with MPRL E&P, he or she shall decline that information. Proprietary information includes financial, marketing, customer, pricing, medical management, or operations information and strategic plans and initiatives which are important to MPRL E&P.

Public Service and Charitable Activities; you have a personal interest in another party that has received or may receive a charitable contribution from MPRL E&P, he or she shall disclose that interest and shall seek permission from Senior Management before engaging in any discussions with MPRL E&P concerning charitable contributions to that party.

## 11. Keeping Accurate Business Records & Confidentiality

Our record keeping, including, but not limited to, financial and accounting, operational records of geoscience and petroleum engineering, and other business related records must always be accurate, proper, and fulfill contractual and legal requirements, and be completed in a timely manner. All submissions to respective government and regulatory authorities must also be accurate and on time.

If you suspect improper record keeping, report it immediately to your manager, or Head of Internal Audit, or Whistleblowing Review Committee (WBRC), or Chief Compliance Officer. You may also report your concerns anonymously via the Whistleblowing Policy.

Accounting and Internal Control; we keep our financial and accounting books, records, transactions and accounts as per Section 15 (Accounting) of the Field Management Plan (FMP) and the generally accepted accounting principles of all business transactions and use of assets.

Privacy & Personal Information Protection; we are also committed to respecting the privacy of personal information and data. Personal data should be obtained by lawful means and, where it is required, with the knowledge or consent of person concerned. Protecting that information and respecting privacy is fundamental to maintaining trust.

Confidentiality; all information possessed by the company and not available to the general public, constitutes secret or confidential information which is the property of the Company. Every employee and consultant will be required to sign the *Confidential Information Agreement* or prescribed form pursuant to the company policy. Always keep confidential information about MPRL E&P and personal data confidential unless you are specifically authorized to express or convey to other persons, internally or externally.

## 12. Compliance of the Code, Other Policies, Instructions & Office Orders

All employees are responsible to comply with all other Policies, Instructions & Office Orders, including, but not limited to, HR Policies {as mentioned on the MPRL E&P intranet portal & webpage; Section 5.1 of the HR Manual-2010 (as long as any clauses are not contrary to other policies and HR Staff Handbook, which were issued 2010 onwards) and the HR Staff Handbook-2019}, Section 15 (Accounting) of the Field Management Plan (FMP) including the Approval Matrix for Procurement, Purchase Order and Payment, and other departmental issues at the intranet portal in addition to the Code.



Some extraction of HR Policies are mentioned as follows.

Harassment; defining harassment precisely is not easy, but it includes slurs, threats, derogatory comments, unwelcomed jokes, display of sexually suggestive objects to include calendars, photos, etc., teasing or sexual advances, and other similar verbal or physical conduct. Harassment, in any form (verbal, physical or visual) is a prohibited personnel practice, a violation of the law, and will result in corrective action. If you believe that you have been the victim of harassment, or know of someone who has, report the alleged act immediately to the appropriate HR representative. The HR Department will undertake an appropriate investigation immediately.

Unacceptable Behavior; although there is no way to identify every possible violation of standards of conduct, the following is a partial list of infractions which will result in corrective action.

- Fighting on company or customer premises.
- Possession of controlled substances including illegal drugs, firearms or incendiary devices.
- Theft of company property or attempt of the same.
- International falsification of company records.
- Any crime involving an employee's honor or honesty and public morals resulting in conviction.
- Engaging in sabotage or espionage.
- Deliberate destruction of company property.
- Insubordination or refusal to comply with instructions or failure to perform reasonable duties which are assigned.
- Performance which, in the Company's opinion, does not meet the requirements of the position.
- Any violation of Company policies and practices.

Substance Abuse Policy: MPRL E&P seeks to provide its employees with a drug free work environment. Drug use in the workplace is strictly prohibited. Furthermore, employees are required to report to work free from the presence of prohibited drugs in their systems. Alcohol use by employees on the job is also prohibited.

#### IT, Computer & Internet Use;

- The use of company computers shall be for business purposes. No improper material shall be stored on, or circulated, or reproduced by company computers.
- The MPRL E&P internet facility is established in order to provide better access to job-related information, such as websites for vendors, equipment manufacturers, technical institutions, and contractors etc. It is not established for personal use on internet chatrooms or for random surfing on the internet.
- The MPRL E&P internet system is a work-related tool and should be used as such. The misuse of this facility, which is an integral part of the MPRL E&P Communication System, is strictly prohibited.
- The "*Acceptable IT Usage Policy*" is to be complied with and, if it is discovered that someone does not comply with this policy, internet access will be blocked and it will only be available to personnel who can prove that they use this facility responsibly.

#### IT Security Policy and Procedures

It is a framework for establishing suitable levels of IT security for all MPRL E&P IT Systems (including but not limited to all computers, mobile devices, networking equipment, software and data) and to mitigate the risks associated with the theft, loss, misuse, damage or abuse of these systems.

The purpose of this procedure is to provide guidance about how MPRL E&P's MIS Team will manage user accounts on systems operated by MPRL E&P, including, but not limited to, electronic mail systems, servers, and administrative databases. This procedure applies to all equipment that is owned or leased by MPRL E&P.

All employees of MPRL E&P and third parties (Contractors, Suppliers and JV Partners) working on MPRL E&P projects will be users of MPRL E&P information. This carries with it the responsibility to abide by the IT policy and procedures and relevant legislation, supporting policies, procedures and guidance. No individual should be able to access information to which they do not have a legitimate access right.

Telephone Use; the use of international direct dial telephones within Myanmar is strictly limited to MPRL E&P Management or their delegated official users, and must be exclusively for essential business. All phone calls to foreign destinations must be logged, with the time and destination of the call and name of the caller kept in a register.

Dress Code; dress and appearance must never be revealing, provocative, or offensive to our customers or our employees. Employees to whom uniforms have been provided will be expected to wear these in accordance with guidelines mentioned in the Grooming & Uniform Manual & Guidelines when on Company premises or on Company duty, and to maintain their uniforms diligently.

Smoking; MPRL E&P recognizes the inconvenience to non-smokers, and the potential health risks associated with smoking. Therefore, smoking is only permitted in designated areas and only during breaks and lunch periods. This policy applies to any MPRL E&P facility before, during, and after working hours, including weekends.

### 13. Implementation, Review, Monitoring and Reporting

To ensure the successful implementation of the Code, MPRL E&P will:

- Provide all employees with a printed copy of the code to make it easily accessible.
- Upload the Code to the MPRL E&P intranet portal and official website including contacts for WBRC and WBRC's members, and Whistleblowing Report Form for easy access.
- Cascade and send e-mails to all employees to introduce the code, indicate where employees can obtain a printed copy of the document, and include a link to the online version of the code.
- Conduct formal trainings on business conduct and ongoing communication to provide employees with experience using the document as a tool and equip employees with knowledge of how the code applies to their day-to-day work environment.
- Include a presentation of the Code in Staff Orientation/Re-Orientations sessions.
- Arrange a training video, and cascade and send e-mails to all employees to indicate where employees can access the Code training video.



All employees, officers, managers, executives and directors of MPRL E&P must read this entire Code of Conduct. If you have any questions about its contents or how it applies to your job, speak to your manager or one of the members of the Whistleblowing Review Committee (WBRC) or the Chief Compliance Officer (CCO).

Acknowledgment Form; once every two years, you will have to complete a Code of Conduct Acknowledgment Form to confirm that you have read and understand this Code of Conduct and comply with it and other key policies, disclose any possible conflicts of interest, and raise any concerns you may have about possible violations of the Code of Conduct.

The Compliance Department has general oversight for MPRL E&P's Organisational Code of Conduct, such as reviewing the Code on a regular basis, monitoring, and conducting an annual review of the company's performance against the Code. MPRL E&P executive management is accountable for the implementation of the Code. Compliance Department will review the Organisational Code of Conduct every two years to ensure that it is aligned with the changes in our business and external environment, including changes to national context and legal requirements.

All of you are responsible to report any breach of the Code within your working environment to the appropriate person(s) immediately according to the MPRL E&P Whistleblowing Policy.

Breach of the Code, Policies, Instructions and Office Orders may result in disciplinary action, up to and including dismissal. We reserve the right to amend or update the Code and Policies as required from time to time.