



MPRL E&P Pte Ltd.

Community Operational Grievance Mechanism







1. Introduction

MPRL E&P operates Mann Field in Minbu in Central Myanmar through a Performance Compensation Contract with Myanma Oil and Gas Enterprise (MOGE) and it implements a strategic Corporate Social Responsibility (CSR) Program to support the host community consisting of 14 villages.

Since the field operations commenced in 1996, MPRL E&P has sustained a firm commitment to the host community with its increasingly extensive investments in local community needs and socio-economic development in the area as part of its shared value model in the country's second-best onshore oil producing asset.

MPRL E&P's approach to Corporate Social Responsibility has been widely supported by broad-based stakeholder engagement activities including but not limited to the Local



Community and Township Authorities and Regional Government. The objective is to develop a transparent and constructive approach to local community engagement and investments. MPRL E&P firmly believes that its strategic Corporate Social Responsibility initiatives in line with IFC's Good Practice Principles upkeep the company's social license to operate in Mann Field while the community harvests lasting benefits from its onshore oil producing operations.

Accessibility, Predictability and Transparency for the Community

Wherever business enterprises operate, their activities will bring them in contact with local communities. Sometimes these contacts are mutually beneficial, but on occasion problems arise with some of them being serious.

There have been many well-documented situations where serious harm has occurred as a result of companies' activities. It is now over 10 years since the United Nations Human Rights Council adopted the Framework "Protect, Respect, Remedy", which led to the UN Guiding Principles on Business and Human Rights.



MPRL



Since the adoption of the UNGP, there has been some progress in terms of companies creating Operational-level Grievance Mechanism (OGM) and understanding their usefulness. OGMs are directly addressed in Guiding Principle 29, which calls on businesses to "establish or participate in effective Operational-level Grievance Mechanisms for individuals and communities who may be adversely impacted", in order to make it possible for grievances to be addressed early and remediated directly.



UN Guiding Principles

The UN "Protect, Respect and Remedy" Framework and its companion instrument, the UN Guiding Principles, state companies have a responsibility to respect human rights. As part of this obligation, companies should provide access to remedies for individuals, workers and/or communities who may be impacted by their activities by establishing a grievance mechanism (GM) to handle complaints. In accordance with Principle 31 of the UN Guiding Principles, GMs should be legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning and based on engagement and dialogue.

In a country like Myanmar where natural resources are abundant, Oil and Gas exploration and production plays an important role in positively impacting Myanmar's economy. When undertaking oil & gas exploration and production, the local communities where we operate may sometimes have concerns or grievances based on the potential impacts that our operations may have on them.

A mechanism to address affected communities' concerns and complaints — an Operational Grievance Mechanism (OGM) — is an important pillar of the stakeholder engagement process, since it creates opportunities for companies and communities to identify problems and discover solutions together. There are several models of grievance mechanisms and multiple roads to remedy and multiple kinds of remedies — OGMs fit within this remedial ecosystem.







2. The OGM at MPRL E&P

MPRL E&P has designed an Operational Grievance Mechanism (OGM) process to reflect IFC standards. The grievance mechanism provides access for communities to lodge concerns and complaints that can be effectively addressed. MPRL E&P's objective is to ensure communities are given a voice and to ensure impact associated with operations affecting the environment and surrounding communities are monitored and effectively addressed. Receiving a social license to operate is a driving factor to establishing an effective partnership with community stakeholders.

The OGM at MPRL E&P is a process for systematically receiving, investigating, responding to, and closing out complaints or grievances from affected communities in a timely, fair and consistent manner. Our grievance management system aims to be based on dialogue with our stakeholders first and foremost, and is designed to prevent any retaliation risks. We consider this to be essential in order to maintain a social license to operate in Mann Field.

MPRL E&P works closely with the Operator of Mann Field, Myanma Oil and Gas Enterprise (MOGE), providing advice, support, and guidance. The objective is to enable local communities to have a voice and to ensure impact associated with operations affecting the environment and surrounding communities are solicited, monitored, and effectively addressed.

We aim to solve all grievances quickly. Depending on the severity level of a grievance and the type of issue raised, the response to the complainant can take anywhere between first 24 hours in cases where immediate resolution is necessary and/or possible up to a maximum of 30



U Sithu Moe Myint
Chief Operating Officer (COO) &
Executive Director
MPRL E&P Pte Ltd.

affected by our operations, they can submit their grievances to us in three different ways. The first method is to submit their grievances through writing. We have a letterbox in each of the 14 villages within our project area. The second option is to contact us directly by phone to our offices. The third method is to contact the community volunteers in each of the villages.

days in cases (rare, if within our sphere of influence) where detailed investigations resolutions are required.

To encourage accessibility by stakeholders, the existence of OGMs and details of processes must be known to them. Information for the potential users of the OGM and wider communication with the general public are essential.





2.1 Objectives

MPRL E&P aims to:

- Implement a safe and secure system that effectively receives complaints/concerns associated with our operations.
- Provide stakeholders with an opportunity to develop a partnership with MPRL E&P by working together to minimize risk and address concerns.
- Resolve concerns received in a timely manner with all primary stakeholders involved in a confidential space.
- Ensure the views of each complaint are respected and not discriminated against.







3. Our OGM Journey

We value our host community and see disclosing information and providing a platform to promote two-way communications as important factors in partnership formation, trust building and maintaining the social license to operate. This said, we adopt a multi-stake-holder approach to designing an Operational Grievance Mechanism (OGM) in Mann Field and it is the first ever mechanism in Myanmar led by MPRL E&P, Myanma Oil and Gas Enterprise (MOGE) and the host community to empower the local community by providing them with a voice and to ensure impacts associated with the operations are solicited, monitored and effectively addressed.



Ms. Vicky Bowman
Director, Myanmar Centre
for Responsible Business (MCRB);
International Advisory Council,
IHRB

What was really innovative about the MPRL E&P's OGM was that it was the first time a Myanmar company had based a complaint grievance mechanism on the UN Guiding Principles on Business and Human Rights. It was also innovative in the way it used volunteers, who were embedded in the villages and they were from the villages and were therefore trusted by the villagers in a way that somebody coming directly from the company would not be.

As part of MPRL E&P's outreach and awareness building, Community Volunteers and CSR Field Team regularly conduct information sessions for Mann Field Communities, split up into small groups for them to better understand how the complaint will be handled and the types of remedy the company can, or cannot, provide and the timelines for the remaining steps in the procedure. Communities are provided a variety of access points so that they can lodge a grievance in a manner convenient to them. The access points are publicized as part of the company's outreach and awareness building. At each MPRL E&P operated site, a grievance expressed by our stakeholder goes through the below 5-step process.







4. Our OGM Process

Receive & Acknowledge

Grievances can be expressed in local languages and lodged in writing, by phone to our offices and through our community volunteers. Each grievance is acknowledged once received, and the complainant is informed of the next steps.

Assess & Assign

Once we receive a grievance, we assess its severity. CSR Field Staff reports to MPRL E&P's Field Operations Manager and MOGE General Manager and coordinates with assigned staff who will follow through to ensure that the issue is investigated by respective department that are best suited to do so. The complainant is then responded to in due course. If there may be grievances with high severity levels, they are escalated to executive management level.







Investigate & Respond

The CSR Field Coordinator and the respective departments investigate the grievance and respond to the complainant informing them about the proposed resolution. In some cases, more information may be requested from the complainant to ensure a thorough investigation.

Close Out

We strive for our community grievance process to be based on dialogue where a resolution can be found together with the complainant. Remedies are proposed depending on the case. If the solution is not satisfactory, the complainant can appeal, in which case the grievance will be re-evaluated. Once the complainant accepts the solution, the grievance is considered resolved.

Lessons Learned

A key step in the process is regular review and extraction of lessons learned from the grievances received. Grievance trends are regularly discussed with executive management and at project sites for improvements to the grievance management process itself.

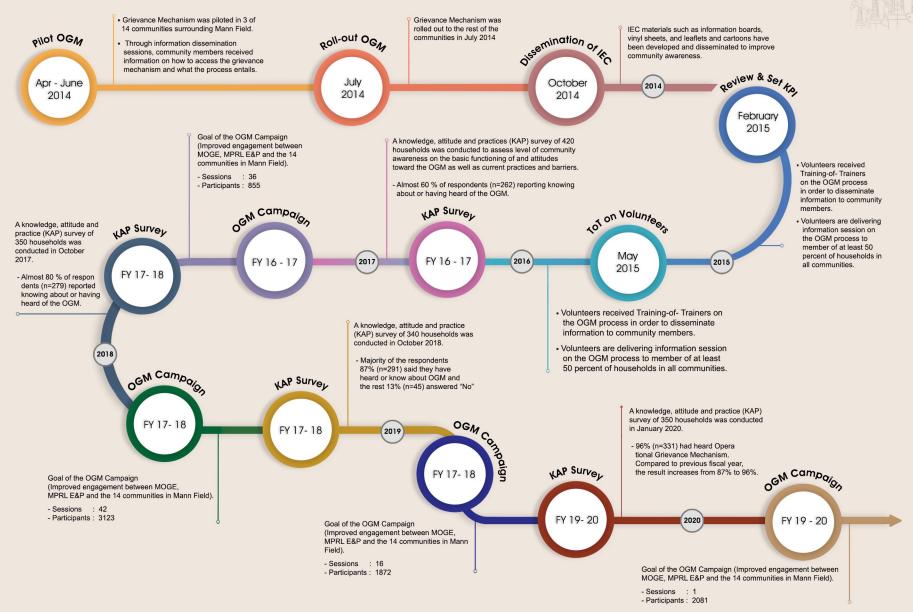








Build through Excellence - Lead with Integrity







I found out about MPRL E&P's OGM process from the awareness sessions in our Village. I noticed the utility pole near well #33 was on the ground, which could cause an electrical hazard. I informed our Village Administrator who reported the case to CSR Field Team. The CSR Field Coordinator immediately reported the case to the MPRL E&P's Field Operations Team and then to MOGE's Electrical Department. The representatives from the Electrical Department inspected the case and resolved the concern on the same day. Because of my reported case through the OGM, the entire community was safe from potential electrical hazard. Also, the new pole is of solid steel, not wood like the old ones we used to have, and therefore, it prevents potential risks or any future hazards in my village. I passed on this OGM information to my neighbors by using my case as an example. I wish MPRL E&P continue having this effective mechanism.



U Aye Thaung Ywar Thar Village







5. Awareness Raising Campaign in Mann Field

MPRL E&P had been organizing OGM awareness raising campaign for four years starting from 2016 to 2019. Before the OGM awareness raising campaign was kicked off, MPRL E&P had conducted knowledge, attitude and practice (KAP) survey to determine the awareness level on OGM; to explore the satisfaction level of complainants; and to identify process improvements required. The campaign design was made based on the KAP survey results. The CSR Team always keeps awareness actionable and strive to achieve the underlying goal of this awareness campaign – improved engagement among MOGE, MPRL E&P and 14 surrounding communities of Mann Oil Field.



The very first OGM Awareness Raising Campaign was organized by CSR & Communications Department in the fiscal year of 2016–2017 through a series of knowledge sharing sessions and raised the awareness for a total of (855) community members from (14) communities in Mann Field. In the fiscal year 2017–2018, we continued the campaign with three phases

and (3,123) community members joined the different sessions during the campaign period. In this fiscal year, (16) personnel from MOGE and (54) volunteers had also received OGM Awareness. From May 2015 to March 2018, (2,766) households from the (14) communities were given (553) OGM information sessions through community volunteers.





In third quarter of fiscal year 2017–2018, the CSR & Communications Department launched a two-phase campaign to raise awareness about its Operational Grievance Mechanism selected target community groups in Mann Field with the aim of promoting their interest, awareness and confidence in the process.

The OGM awareness raising campaign for 2019–2020 fiscal year was run in November 2019 in order to promote awareness and practice of Operational Grievance Mechanism (OGM) among the communities in Mann Field with the support and efforts of the community volunteers. In this fiscal year, we came up with an idea to attract the attention and participation of school children, their families, teachers, school administrators, communities, local authorities and MOGE through school children's musical contest, and display of CSR functional booths.











The school children groups from 10 schools had to prepare performance over a theme song on OGM developed by CSR & Communications Department at the CSR Open Day and OGM Awareness Raising Campaign. As part of showcasing Mann Field's CSR activities at the event, a total of 10 CSR functional booths were set up for OGM cartoon gallery, environmental awareness and Trash Hero Minbu activities, face painting, vocational training products including bamboo-based products, cotton bags, soaps and foodstuff so that the visitors could buy them and enhance their knowledge on the CSR initiatives in Mann Field, and take part in the fun activities themselves like face painting and OGM quiz at the respective booths. In this campaign, the four entertainment groups





organized by Field Operations Team had performed the visitors as part of the program and a total of 2,081 visitors from Mann Field Communities enjoyed the event. All activities were facilitated by CSR Team, Field Operations Team, Community Volunteers, vocational trainees and Village Development Committees (VDCs).

Despite awareness campaigns, there may be some people who do not know about an OGM or that it is relevant to them. In this case, community leaders also help to publicize the OGM and act as referral points. Designing a mechanism facilitated by Community Volunteers has proven to be successful as trust is immediately captured. In addition, strengthening the capacity of volunteers has led to improved decision making and empowerment.









Because Mann Field Operations is running 24/7, we expect some environmental and social impacts on the surrounding communities. Environmental impact cases rarely occur in Mann Field due to our company's careful operational performance following the environmental guidelines. If the community members are dissatisfied with such impacts and results in implementing our OGM process to solve the problem, Field Operations Team always ensures to collaborate with the respective stakeholders (CSR Field Team, Community Volunteers, Village Administrators, and MOGE) based on the reported cases. This kind of collaboration is very important because it is the most effective way of resolving the

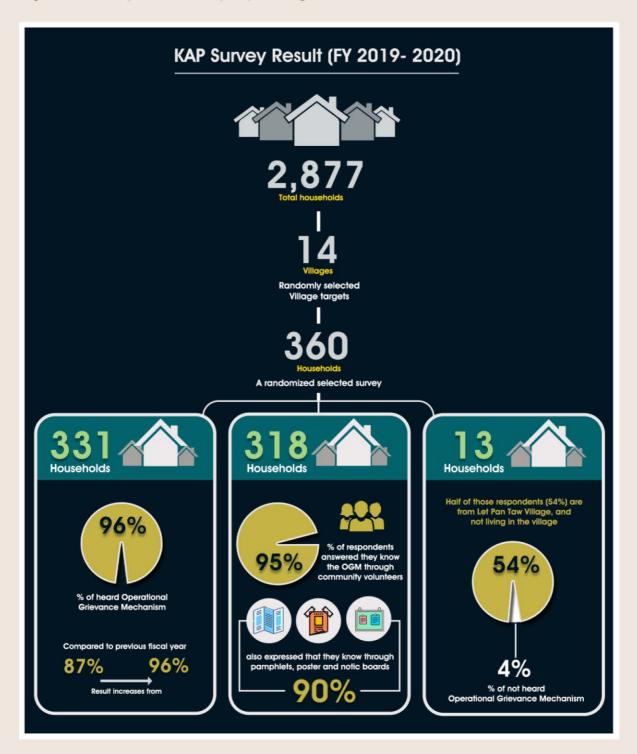
issues and satisfying the communities, and also, it brings out the teamwork spirit which is crucial for the OGM process. By having an OGM channel, issues get resolved faster and our operations have neither significant conflict nor delay. But we can even prevent unsafe conditions, which can bring electrical or fire hazard to our operations, due to the OGM case reported by the community. The OGM process serves as the bridge for the stakeholders and the organization in providing a better understanding of our field operations and how we find a resolution to satisfy the community's concerns. It promotes a strong relationship between the business organization and the surrounding communities.





6. KAP Survey Result (FY 2019-2020)

The annual OGM KAP survey was conducted in the third week and fourth week of January 2020. The target population considered for this survey was 2,877 households, with a simple size of 344 households. Using simple random sampling, 360 households were randomly selected from sampling frame of 14 target communities in Mann Field. Following is a summary of the survey key findings.











OGM Awareness Raising (FY 2019-2020)

The OGM Awareness Raising Campaign and CSR Open Day is conducted and a total of 2,081 participants joined the event.

Goal of the OGM Campaign

Improved engagement between MOGE, MPRL E&P and the 14 communities in Mann Field.

Objectives of the OGM Campaign

- . To increase in awareness about OGM in targeted communities by 30%
- . To increase by 30% in the number of respondents who can utilize the mechanism efficiently.

To increase by 10% in the level of trust in the OGM which will help build a better relationship between the three stakeholders.

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7. OGM Reflection in Impact Assessment Survey (FY 2021-2022)

MPRL E&P's CSR & Communications Department conducted the impact assessment study by organizing Focus Group Discussions, Key Informant Interviews and Household Surveys in Mann Field Communities from 28th to 31st March 2022. The research was implemented with the objectives to gather feedback from the target beneficiaries and community stakeholders involved in the process of implementing CSR initiatives, to assess the projects in terms of effectiveness and satisfaction, and to identify corrective measures for better implementation, execution and impact of the CSR interventions by MPRL E&P in Mann Field.



In the assessment research, the CSR Team conducted 15% of Household Surveys which assessed about (422) community members for community perception on CSR initiatives including Mann Field Grievance Mechanism. To ensure impartiality in the assessment exercise, the Communications Team led Focus Group Discussions and Key Informant Interviews with Village Administrators, Village Development Committees, Community Volunteers, Women Group, Men Group, Farmer Group, Vocational Trainees, former MOGE CSR Staff,



and other related stakeholders, who are beneficiaries of Community Investment Initiatives from (14) surrounding communities of Mann Field.

According to the Household Survey results, 97% of respondents knew the OGM. Those who knew about or had heard of OGM were then asked how they knew about the OGM. It turned out that 89% knew through brochures, pamphlets and posters, while 88% did so through Community Volunteers and CSR Staff. Most of the respondents expressed appreciation for the Operational Grievance Mechanism as it has enabled them to voice their concerns or complaints directly to the company and receive a satisfactory answer during the set timeframe.









In the Focus Group Discussions, participants revealed their responses to the OGM questionnaires and their satisfaction with the mechanism. The response summary about OGM is as follows:

- Farmers can raise issues with the company any time without fear of repercussions.
- Easy to communicate CSR Staff to report issues and oil leakage and electrical hazard cases have been handled well.
- · No health impacts so far from oil leakages.
- Challenging to report oil pilfering cases through the current formal system due to risk of being targeted by perpetrators in a community where everyone knows everyone else.





During the Key Informant Interviews, the interviewees expressed their confidence in applying Mann Field Grievance Mechanism and also revealed their trust in the mechanism by sharing their knowledge of OGM and referring their neighbors to use the mechanism as their rights. The interviewees affirmed that the mechanism can reduce their loss, protect their rights and resolve their sufferings. As they can tell their difficulties and needs to the company via OGM freely and openly, it is beneficial not only for farmers but also for all community members.





The results of Impact Assessment reassured that MPRL E&P protected community rights through an effective well-functioning OGM at the area where the business operates and the communities remained confident and satisfied with Mann Field Grievance Mechanism.













8. Access to OGM and Remedy in the Crisis Era

MPRL E&P had to run business operations in minimum workforce and budget due to the impact of COVID-19, that the World Health Organization (WHO) declared the novel coronavirus outbreak as a global pandemic on 11th March 2020. However, we never shut down OGM process in the Mann Field, but sustained it as a safe platform for project-affected communities to access and lodge complaints and concerns.











Although there were several challenges in implementing business operations due to the severe situation of the infectious disease and the political issue in the country, we ensured our grievance mechanism to operate properly and effectively even in the crisis time. To be confirmed, there were a total of 45 new OGM cases received from Mann Field Communities during the period of March 2020 to June 2022. Most of the cases came from farmers who informed MPRL E&P to remove or bury or repair old pipelines in their farmlands or to solve oil pipeline issues.

Grievances Received & Addressed during COVID-19 Crisis

March 2020



June 2022

Amid an unsafe and insecure environment, the field personnel enabled the OGM to remain well functioning to act out of good will and sense of duty. All the reported complaints were able to be managed under the collaboration of the OGM process representatives, including CSR Team, Field Operations Team, MOGE Staff, Community Volunteers and Village Administrators. Their collaboration could solve the community's concerns and grievances in a planned, timely, and respectful manner while keeping all KPIs met.

Besides OGM channel, we also tried to hear community voices and concerns through a community survey in January 2022. According to the survey, we noticed a dire need of healthcare service in Mann Field and the communities were facing difficulties and challenges to access proper healthcare in their daily life due to the severe impacts of



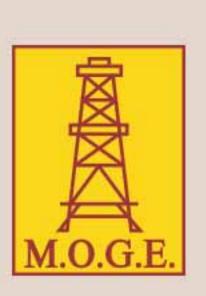




the COVID-19 outbreak and the political situation.

At that critical time, the community stakeholders strongly desired to have MPRL E&P's free healthcare service, Mobile Clinic Program resumed in their villages. Hearing the community's strong voices, MPRL E&P's CSR Program tackled the challenges to fulfill







the community needs and met their requests by relaunching Mobile Clinic Program in Mann Field Communities in line with the pandemic preventive measures.

Since April 2020, MPRL E&P had suspended the Mobile Clinic Program temporarily by considering health and safety concerns of both staff and patients during the COVID–19 pandemic. However, after listening to the community's voices and requests, the Senior Executive Management decided to reopen Mobile Clinics for Mann Field Communities.

The Mobile Clinic Program was reopened on 21st February 2022 after twenty-two-month suspension and started running four clinic sessions per week in four centrally located villages around Mann Field: Kywe Cha, Kyar Kan, Lay Eain Tan and Let Pan Ta Pin Villages. Since July 2022, two more Mobile Clinic sessions are available every other Wednesday at Aye Mya and Nan U Villages. Currently, five clinic sessions are conducted a week at six locations, providing free-of-charge healthcare services to Mann Field Communities.

MPRL E&P's CSR Program contributed necessary support to Mobile Clinic Program, running with the medical doctor, two healthcare assistants and community volunteers, and monitored the program progress regularly.







Since June 2022, two Site Doctors from MPRL E&P joined the Mobile Clinic Program and they also provided 21 health talk sessions on common health problems—diabetes and hypertension to 428 community members in Mann Field. Up to 27 March 2023, Mobile Clinic Program received (7,630) patient visits through (230) clinic sessions since the program resumed in February 2022.



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During the Household Survey of CSR Impact Assessment, the community expressed their words on Mobile Clinic Program as follows:

- The Mobile Clinic uses good medicines which effectively cure the patients' illnesses. The majority said they felt better within a short period of time.
- The free of charge services benefit elderly and children as well as for poor people in the communities.
- Patients with chronic diseases such as diabetes and hypertension can access medi cines regularly to control their diseases and prevent further implications.
- The doctor and clinic aides were friendly and supportive to the patients. 100% of respondents voiced that MPRL E&P's Mobile Clinic Program benefited themselves, their family and the whole community.







9. OGM at a Glance: Key Performance Indicators (KPIs)



Average Time to Feedback (days) Target 14 day

OGM
Key Perfomance
Indicators
(March 2023)

Average Duration to Closure (days) Target 30 days

% Satisfied with the Process (Target 50%)

% Satisfied with the Outcome (Target 50%)

Average Time to Acknowledgment (days) Target 1-3 days

Figure 1. OGM at a Glance: Key Performance Indicators (KPIs) September 2014 – March 2023







I reported on oil leakage in my farm near well #175 by following MPRL E&P's OGM procedure. I informed our Community Volunteer about the case by asking her to request the respective representatives to inspect the site and fix it as needed. CSR Field Coordinator reported the case to Field Operations Team immediately. They made an inspection, cleaned the spilled area, and repaired the pipeline on the same day! I was grateful to see their immediate action after reporting the case via a phone call. Thanks to MPRL E&P and the CSR Team! This speedy action helped me and my family meet the crop production timeline and also, it reduced damage to nearby crops and soil in the surrounding area. I would like to make a suggestion here; it would be great if holes of these pipelines can be coated with concrete and tightened with screws for easier disassembling. ""



U Aye Min Mann Kyoe Village

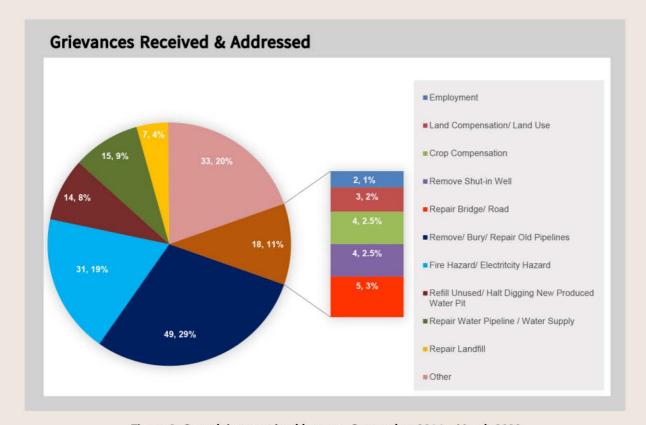


Figure 2. Complaints received by type: September 2014 - March 2023





Received & Closed Cases by Quarterly: September 2014 - March 2023

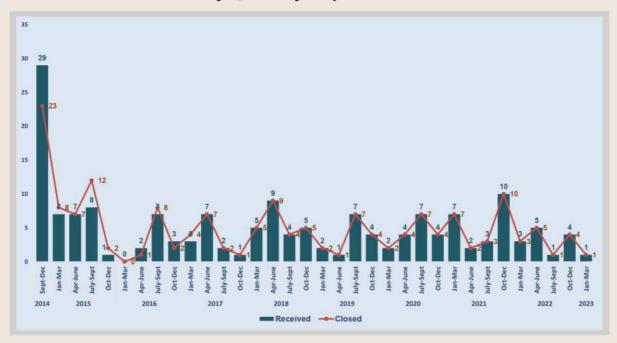


Figure 3. Received and Closed Cases by Quarterly: September 2014 - March 2023

Because I am both a Village Administrator and Community Volunteer, I know a lot about the MPRL E&P's OGM process and have good experience in sharing the OGM-related information with others. For example, if there is an oil pipeline leakage in Mann Field, the respective department will quickly repair the damaged pipeline, clean the oil spill on the ground and make soil or dirt replacements. There was a time when two pipelines crossing my farm caused difficulties in cultivation. I called CSR Field Team and reported the case using the OGM procedure. I requested that the company remove those pipelines if they were not in use. CSR Field Coordinator informed Field Operations Team about this concern, and the Team inspected the reported case in a heartbeat. They explained to me that one of the pipelines was still in use and asked me whether it would be okay to remove the unused one. I was pleased with their response and the immediate action because it really helped me with my cultivation. ""



U Kyaw Min Makyee Chaung Village







10. Current Challenges

Additional stakeholders are required, especially Township Land Management Committee.

As the Village Administrator, I offer the farmers in my village information and advice related to the OGM and I would sign off their complaint forms, acknowledging that the information is correct and I am informed of its submission to the company. Sometimes when the nature of complaints cannot be solved by the company, I, together with the CSR Field Staff, would explain why the company cannot deliver the resolution to the complainant until they can understand and accept the explanation. Because the company has put the OGM in place in Mann Field, we can directly reach the company personnel and solve the issues instantly—whether it is oil spillage or water pipeline leakage or electrical hazard, reducing damage to life and property. Consequently, the OGM has brought about many good things to the communities living nearby the operations. ""







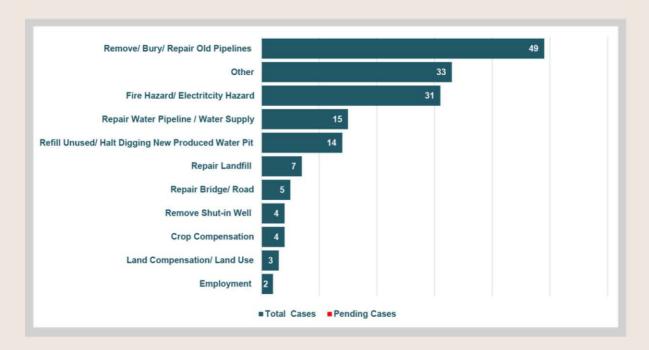


Figure 4. Total Received Cases by types: September 2014 - March 2023









U Thura Win Senior Engineer Field Operations Department

In our OGM process, Field Operations Team is responsible for resolving OGM cases informed by the CSR Field Team. When a case occurs, the first step is to conduct a field study of the case and then meet with the CSR Field Team and the Community Volunteer and analyze the case. If the case is easily resolvable, we provide feedback with how and when it can be resolved, otherwise, we explain the reasons why we cannot take action as per the complainant's request. The feedback we receive from the community after solving the case or cases has been positive. Having a structured OGM process is vital for any exploration organization; it promotes a healthy relationship and trust between community members and the company. Lastly, it is the most effective way to resolve issues and provide remedy to those affected in a peaceful way.

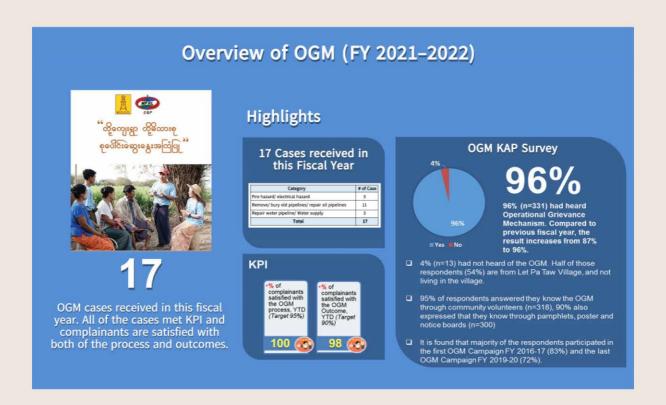
I assist community members who want to submit a complaint about an oil pipeline that spills or about old electric cable wires that need to be fixed or replaced in filling in necessary documents and informing the CSR Field Coordinator of the complaint. As a Community Volunteer, I had contributed to the organization of the OGM Awareness Raising Campaigns for the communities over the past four years. Through these activities, I have strengthened my relationship with my fellow community members, gaining their trust and confidence. The OGM is a very beneficial tool for the community stakeholders in Mann Field, and I hope it will exist as long as the operations do.



Ma Kyi Kyi Myaing Community Volunteer Kyar Kan Village







11. Next Steps

As MPRL E&P planned to launch its fifth OGM Awareness Raising Campaign in the fiscal year of 2022–2023, the campaign was designed the two-day four-session with six hands-on exhibits showcasing CSR initiatives and a cartoon gallery with crowd control measures in place during the third week of March 2023.

The campaign aimed to strengthen awareness level about the OGM and to increase in trust upon the resolved OGM which helps to build a better relationship between MOGE, MPRL E&P and Communities and a total of (788) community members participated in the campaign. We will also measure the effectiveness of OGM Awareness Program by tracking changes in the level of community awareness of the OGM process.

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