



Local Community

OPERATIONAL GRIEVANCE MECHANISM

(FY 2023-2024)

MPRL **E&P** Pte Ltd.

DOCUMENTED GRIEVANCES FROM
Mann Field

Table of Contents

1. Objective	01
2. Scope	02
3. Governing Law and International Standards	03
4. Background	04
5. Methods to Access	05
6. Timeline	06
7. Public Awareness	07
8. OGM Procedures, Roles & Responsibilities	08
9. Potential Outcomes and Remedies	11
10. OGM Statistics	12
11. Lessons Learned and Emerging Trends	15
12. Historical Timeline of the OGM in Mann Field	18



1. Objective

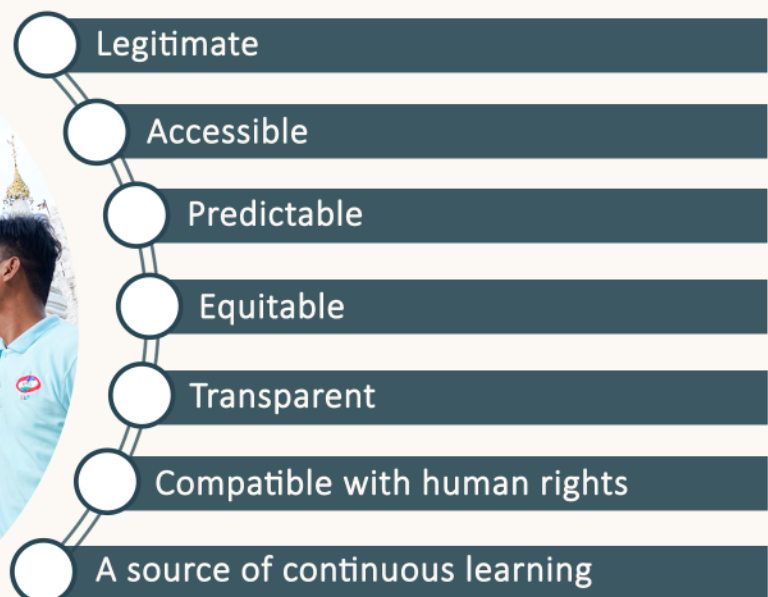
The Operational Grievance Mechanism (OGM) is a formal, private avenue for the host communities consisting of 14 hamlets and villages in Mann Field – where MPRL E&P undertakes hydrocarbon exploration and production activities in cooperation with Myanmar Oil and Gas Enterprise (MOGE) – to raise environmental and social issues if they believe the field operations have or is likely to adversely affect them.

We believe our OGM, among others, meets the following effectiveness principles:

Confidentiality	: a safe and secure system that receives complaints and concerns associated with our operations;
Accessibility	: a route of communications for our project-affected stakeholders to work together with MPRL E&P to address issues and concerns;
Impartiality	: the views of each complaint are respected and not discriminated against;
Transparency	: resolving complaints received in a timely and diligent manner with the involvement of all primary stakeholders.

As a multistakeholder-driven problem-solving mechanism, the OGM aims to resolve issues quickly and effectively through a collaborative manner for delivering sustainable solutions to stakeholder concerns and issues. It also serves as an effective tool for early identification, assessment and resolution of project-related issues and risks.

This project specific mechanism outlines procedures to receive, register, resolve and report concerns and complaints of affected communities and stakeholders as part of the implementation of the enhanced oil recovery project at Mann Field. It does not replace existing administrative or judicial systems of the state for redressing grievances.



2. Scope

We define a grievance as a verbal or written complaint related to the activities and impacts of operations at Mann Field. To a large extent, a grievance refers to an incident or event associated with Mann Field, and is put forward by an individual or group of individuals or a representative acting on behalf of a specific individual or group from the communities surrounding Mann Field.

We work in close collaboration with our project stakeholders, including local communities themselves, to verify all grievances lodged and remediate the damage caused by our activities or the activities of our partners. These include but not limited to the following:

- Remove/ bury/ repair old pipelines
- Fire hazard/electricity hazard
- Repair water pipeline/ water supply
- Refill unused/ halt digging new produced water pit
- Repair landfill
- Repair bridge/ road
- Remove shut-in well
- Crop compensation
- Land compensation/ land use
- Employment



U Sithu Moe Myint

Chief Operating Officer (COO) & Executive Director
MPRL E&P Pte Ltd.

“ If the local community is negatively 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. ”



In addition, we anticipate, listen and respond to minor incidents related to the operations before they escalate, and we actively cooperate to perform remediation with affected stakeholders as early as possible.

3. Governing Law and International Standards

MPRL E&P’s OGM is a formalized, private and non-judicial mechanism that operates under the Myanmar Law. Furthermore, it is implemented in line with a suite of corporate policies, project-specific documents and the international standards.

Project-Specific Documents

- Mann Field Environmental Impact Assessment (EIA) Report
- Mann Field Environmental Compliance Certificate (ECC)

Corporate Policies

- MPRL E&P Human Rights Statement and Policy
- MPRL E&P Corporate Social Responsibility Policy
- MPRL E&P Organizational Code of Conduct



UNITED NATIONS



International Standards & Requirements

- **United Nations Guiding Principles (UNGPs)**
“To make it possible for grievances to be addressed early and remediated directly, business enterprises should establish or participate in effective operational-level grievance mechanisms for individuals and communities who may be adversely impacted.”
- **International Finance Corporation Performance Standards (IFC PS)**
“Where there are Affected Communities, the client will establish a grievance mechanism to receive and facilitate resolution of Affected Communities’ concerns and grievances about the client’s environmental and social performance. The grievance mechanism should be scaled to the risks and adverse impacts of the project and have Affected Communities as its primary user.”



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.”

4. Background

The OGM is a key part of MPRL E&P's accountability framework to respect and promote human rights, and it was first established following a study of the company's safeguard policies by independent consultants in 2013-2014, which recommended that the company design and adopt a grievance resolution mechanism to complement its Corporate Social Responsibility Program in Mann Field. Since then, the OGM has enabled the communities to register concerns, either real or perceived, with the aim of resolving the issues before they impact field operations.

The operational grievance mechanisms are centrally featured in the United Nations Guiding Principles on Business and Human Rights (UNGPs), unanimously endorsed by the United Nations Human Rights Council in 2011. MPRL E&P's OGM is the answer to UNGP 29 which calls on private companies to implement an OGM for early remediation of harm to project stakeholders.

Furthermore, the OGM is designed to reflect the International Finance Corporation Performance Standards, and through the mechanism MPRL E&P ensures the communities has a voice and impact associated with the project affecting the environment and human rights harm are monitored, captured systematically and resolved effectively.



5. Methods to Access

The methods to access the grievance mechanism have been widely publicized within the communities since the full rollout of the mechanism. A grievance mechanism pamphlet in Myanmar language was prepared and distributed to local stakeholders in Mann Field. The pamphlet includes key information about the type of grievances that might occur as a result of our operation activities, key steps towards reaching a resolution through dialog and engagement with all stakeholders concerned, and contact persons with phone numbers to submit a grievance. Access to the mechanism is free of charge, and registering a complaint involves no costs nor retributions.

Anyone can inform us of their grievances, complaints or concerns at a variety of access points within the communities and these are:



In addition, the OGM is regularly publicized at the community meetings, at the local CSR office, and at the company’s website.

All information related to the grievance procedures, grievance registers and grievance reports, which are prepared in both Myanmar and English, are maintained on site and at head office. As we have recruited an incentive-based volunteer for each village as the first point of contact, it’s expected that a number of grievances will be received via the volunteers.

6. Timeline

All grievances will be handled in a confidential and dialog-based manner. From start to close-out, a grievance resolution process can take the first 24 hours to a maximum of 30 days. Cases where detailed investigation and involvement of other stakeholders are concerned can take up to 30 days to be resolved, but this is rare, if they ever happen within our sphere of influence.

In general, the OGM aims to

- Acknowledge receipt of grievances within 1 to 3 working days;
- Provide feedback to the complainant within two working weeks;
- Close out grievances within 30 days from receipt; and
- Target 50% satisfaction rates with the process, and outcome of grievance resolution.

“ As a community volunteer, I serve as the first point of contact for the community members to let the company personnel know of their concerns or complaints and facilitate the case registration, investigation, resolution and closing out in coordination with complainant, village administrator and company personnel.

All complaints have been handled in a diligent and efficient manner, thereby securing satisfaction and trust from the community members. Farmers would lodge their complaints by calling to their village volunteer or in person or in writing. I have witnessed a downward trend in harm to soil and crops as well as electrical hazards in the community on account of the OGM.

I am proud of my role and the contributions I have been able to make to the betterment of



U Nay Zaw
Community Volunteer
Chin Taung Village

the community not only through the OGM but also through health and education initiatives that support local schoolchildren and strengthening the farming households through livestock vaccination initiatives. I hope to help sustain and extend these efforts under MPRL E&P’s CSR Program in all communities for nurturing a new generation of physically and mentally strong leaders and a vibrant community in Mann Field.”

7. Public Awareness

We have delivered OGM information sessions and campaigns for the target communities in Mann Field to ensure a better understanding of how grievances will be handled, the types of remedy the company can or cannot provide, and the grievance procedures and timeframe. We also publish periodic OGM reports on the website, and verbally disclose updates about the OGM at stakeholder engagement activities. We repeat communication and awareness raising sessions regarding the OGM in regular intervals, and these activities track the improvement in community awareness level of the mechanism.





8. OGM Procedures, Roles & Responsibilities

Step 1: Receive and Acknowledge

- Grievances can be expressed in local languages and lodged in three ways—in writing, or through community volunteers or by phone.
- Receipt of each grievance is acknowledged within one to three days and the complainant is informed of the next steps of the process.

Step 2: Assess and Assign

- Once we receive a grievance, we assess its severity. Our CSR Field Coordinator 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 departments that are best suited to do so. The complainant is then responded in due course.
- There may be grievances with high severity levels and they are escalated to company management accordingly.

Step 3: Investigate and Respond

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

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Figure 1. Illustration of Our 5-Step OGM Procedures

Step 4: Close out

- We strive for the process of the OGM to be based on dialog 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.

Step 5: Lessons learned

- A key step in the process is regular review and extraction of lessons learned from the grievances collected. Periodically, grievance trends are discussed with company management and at project sites to identify improvement to the grievance management process itself.





“ 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,



U Myo Win
Field Operations Manager
Field Operations Department

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 ations, 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. ”

9. Potential Outcomes and Remediation

One of the advantages of the operational grievance mechanism is the flexibility that offers a lot of possible resolution options appropriate for the varying types of complaints. These may include, but not limited to, restricting or shifting scope and time for repair or construction activities, providing monetary compensation, replacing damaged soil, removing old property, offering a full verbal explanation, revising engagement strategy or renegotiating commitments.



The grievance investigation team will work together to come up with a resolution and propose it to the complainant. If all parties accept the proposed resolution, which is often straightforward, the agreed actions will be carried out in the given timeline. If the complainant does not agree to the proposed resolution, we shall re-investigate the situation. Then we shall thoroughly explore all alternative options within the grievance mechanism framework and agree upon a final resolution option.



The close-out step will be undertaken by collecting proof that we have taken necessary actions towards the resolution, including a case documentation and evidential photographs or other documentary evidence to ensure a comprehensive record of grievances and how they were handled in a dedicated manner.

10. OGM Statistics

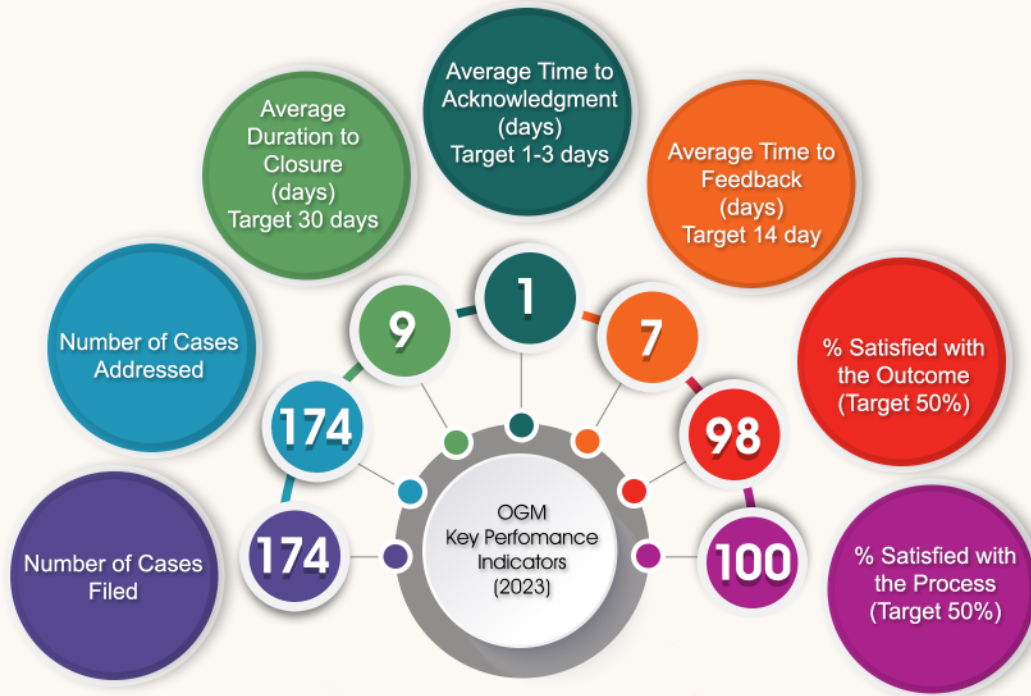


Figure 2. Key Performance Indicators of the OGM

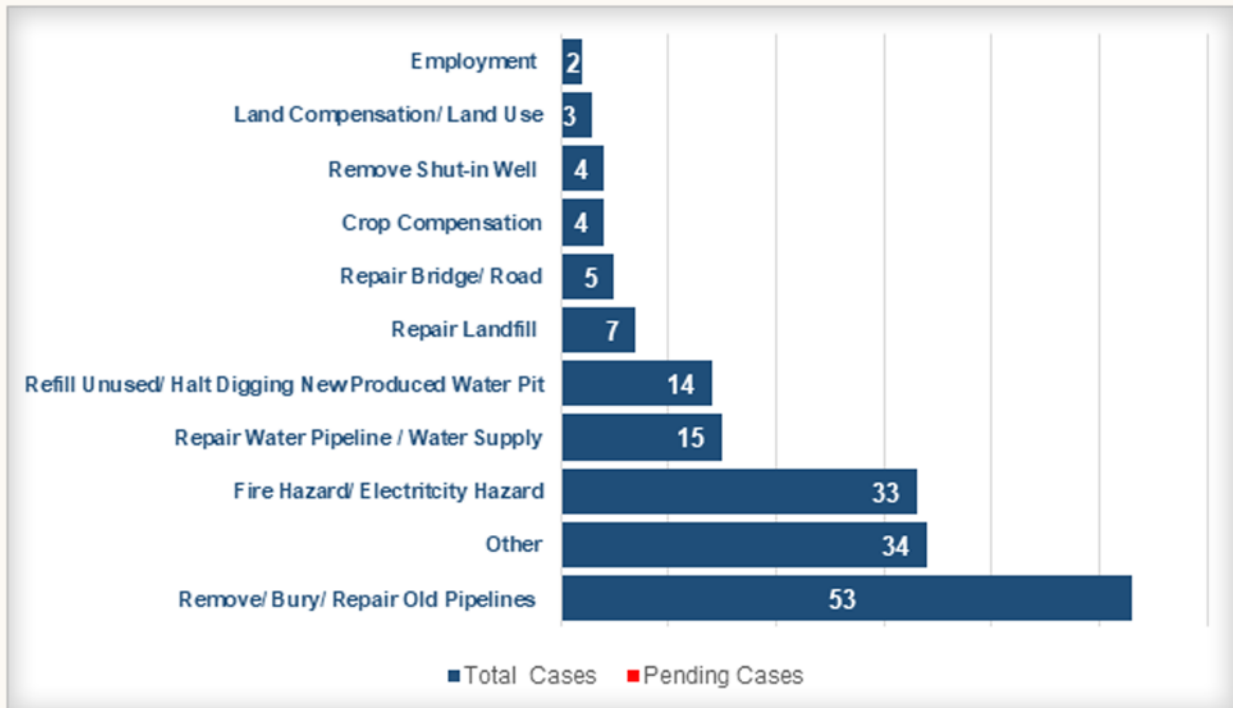


Figure 3. Types of OGM cases received and closed out from September 2014 – December 2023

Intake of Complaints Received by the OGM

The number of complaints received each fiscal year has risen and stayed within a range since the OGM was established in 2013. Except for 2014 through to 2017 during which some of the grievances were carried to the next year for processing a resolution, the OGM cases received have been resolved within the established timeframe. Figure 4 shows the number of complaints received and resolved by the OGM by calendar year, from full rollout in 2014 until December 2023.

OGM Case Register by Calendar Year from September 2014 - December 2023

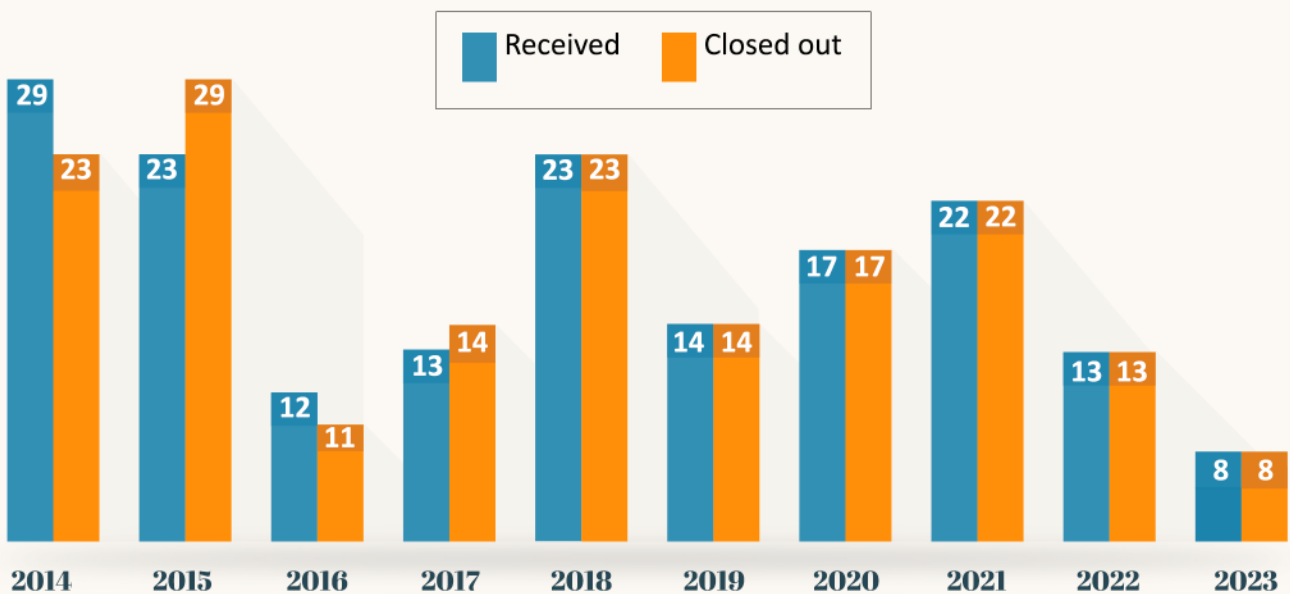


Figure 4. Complaints received and closed out from September 2014 – December 2023

Of the 174 complaints received by the OGM from September 2014 through December 2023, 89% were submitted directly by complainants and 11% were referred by our local staff. The number of complaints raised by community members has increased steadily over time, reflecting greater awareness of the mechanism among the local people.



89%

were submitted directly by complainants

11%

were referred by our local staff



Select Cases

1. Complaint - 1

The complaint was filed with the OGM by two community members. They reported that oil from an oil well located near their farmlands was leaking significant naturally and it was spreading within their farmlands. They requested to inspect and repair it as necessary. The case was registered under the category of 'Remove/Bury/Repair Old Pipelines'.

Resolution

A site inspected was made and the oil spill was fixed; the damaged patch of land was replaced with alluvial soil. The case was closed with 5 days from receipt and the complainant was satisfied with the process and outcome. The CSR team facilitated the process until a suitable resolution was agreed and implemented.

2. Complaint - 2

A complaint was filed with the OGM by community member. The shrubs around the pipeline near his farmland that had been cleared the other day were left on his farmland and he could not do his cultivation freely. The complainant requested that a site inspection be made to investigate and take necessary action. The case was lodged on 29 May 2023.

Resolution

The case was investigated and the shrubs were removed. The case was closed within 8 days from receipt and the complainant was satisfied with the process and outcome.



11. Lessons Learned and Emerging Trends

MPRL E&P signed its first human rights policy in 2014, believing that we have a key role to play to engender respect for human rights in our sphere of influence and society in which we exist. Since then, we have taken key steps to make progress. We have publicly adhered to the United Nations Global Compact Principles since 2016, regularly disclosed our progress and remained ‘active’ on the platform until today.

We aim to respect internationally recognized human rights and those specifically set out in the Universal Declaration of Human Rights (International Bill of Rights), and to do so in accordance with our mission, vision and code of conduct. We achieve this by making reasonable efforts or due diligence to assess our impacts on employees and host communities and, if they occur, to offer remedies to mitigate or repair them.

Regarding our neighboring communities in Mann Field in Central Myanmar – where we operate as the main contractor – we build and maintain strong



relationships based on respect for and recognition of their rights. This entails proactively engaging the host communities through transparent and responsible management of their concerns and complaints associated with our operations.

Despite recent unforeseen challenges, MPRL E&P has diligently demonstrated that the OGM is an essential tool in its accountability framework,



U Aye Min
Mann Kyoe Village

“ I complained about a crude oil pipeline leakage that happened on my land to the community volunteer and MPRL E&P personnel responded at the drop of a hat. I have seen that the company

staff takes great care in entering our farmland with their machinery so as to not cause harm, and their tanker trucks carrying crude oil from wellhead to storage have never had a single incident of spillage or wastage.

It is really convenient for farmers like us as the company take immediate actions to address the issue of oil pipeline leakages and old pipelines on farmland through this reporting platform. As a result, we pass this information to fellow farmers and encourage them to use it if they have concerns or suggestions to the company. It’s not a big deal for us; we are always happy to use it whenever we have something to report. ”



“ As a village administrator, I have to acknowledge by signing complaints lodged by community members as they report to the company through the OGM. Then I coordinate together with respective company personnel and complainant to work out a resolution that meet all parties’ expectations and the mechanism’s performance indicators.

Sometimes I would direct the community about what type of issues and how they can lodge a complaint to the company through the mechanism, and I find it very supportive of and responsive to the community members and farmers when it comes to their concerns.

U Aung Aung

Village Administrator
Kyar Kan Village



The company have never failed to appear and resolve the complaints even during the pandemic and changes in the country’s political process. They diligently explain and discuss to reach a negotiated resolution even if they cannot address a specific concern.”



In addition to its responsibility for handling grievances, the OGM plays an important role in understanding the lessons learned from the complaints it receives and in helping the company’s Executive Management to identify emerging trends in social and environmental issues that may require further consideration or action. The cases processed by the OGM have included a wide variety of issues covering key environmental and social themes as well as emerging trends with growing concerns around COVID-19, safety and security conditions.



helping to ensure best possible outcomes on the ground and reinforce a respectful relationship on the basis of communications and trust with the affected communities. Up to now, 168 cases have been resolved through the OGM. This means, regardless of the ongoing challenges, the mechanism continues to maintain community confidence by resolving cases before they escalate.

Daw San Wai
Chin Taung Village

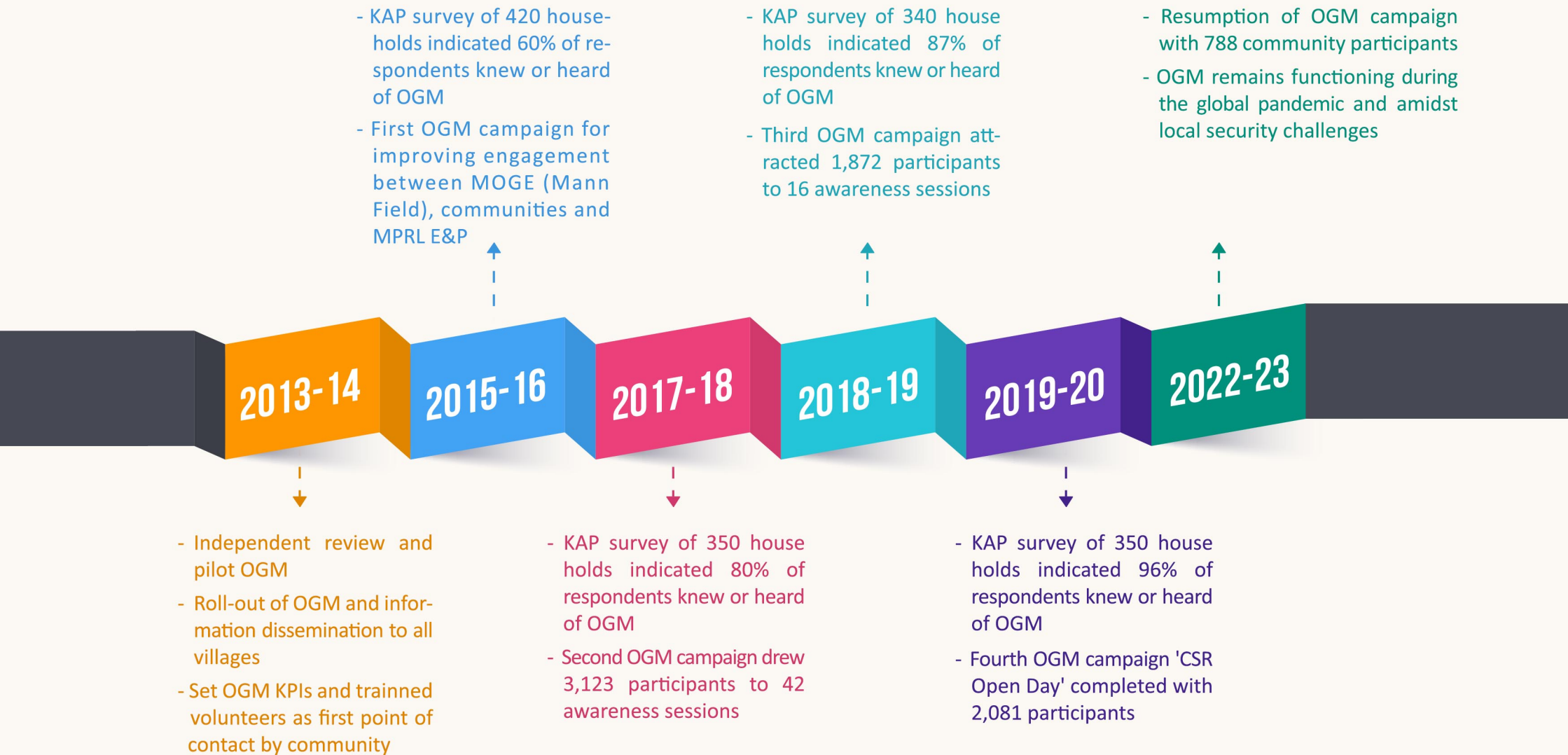


I wish to take this opportunity to express my thanks to the personnel who responded in a timely and effective manner to relieve my concern. The OGM is such a beneficial mechanism that our community and farmers in Mann Field are able to report situations – oil spill or leakage in their farmland, crop or soil damage, to name a few – that affect the community and get responded to minimize and repair harm.”

“ I used to worry about electrical hazards as the low-hanging overhead powerline was too close to my house. In case of strong wind or rain, it posed several electrical hazards, and I was prompted to contact the community volunteer and put him in the picture. Finally, here’s the newly-erected electricity pole in my compound with the powerline kept at a safe distance thanks to the response of officials concerned. I am now able to do my household chores and run my grocery at ease. I do not have to stay out of the house even when it rains or gets windy like I used to, and I feel safe living in my house today.

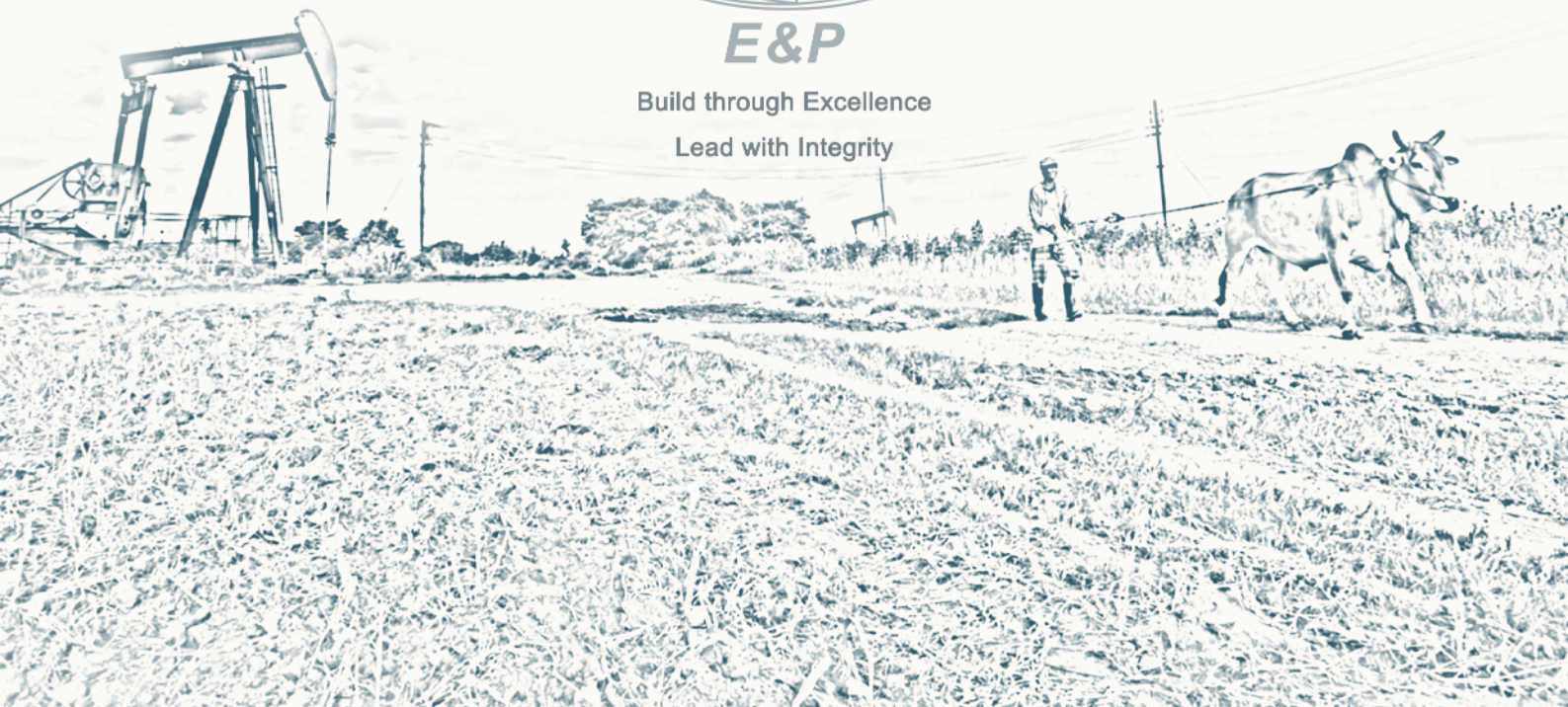


12. Historical Timeline of the OGM in Mann Field





Build through Excellence
Lead with Integrity



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