



MPRL *E&P* Pte Ltd.



ANTI-BRIBERY & CORRUPTION POLICY

Compliance Department

March 2025



VERSION	DOCUMENT		DATE
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00	N/A	ANTI- CORRUPTION COMPLIANCE POLICY AND PROCEDURE	20 JUNE 2012
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02	MPRL E&P/COM/005/2018/02	ANTI-BRIBERY AND CORRUPTION POLICY	03 JULY 2018
03	MPRL E&P/COM/005/2020/03	ANTI-BRIBERY AND CORRUPTION POLICY	11 AUGUST 2020
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DOCUMENT TITLE:	ANTI-BRIBERY AND CORRUPTION POLICY
AUTHOR:	ASST. CHIEF COMPLIANCE OFFICER
DATE:	20 MARCH 2025
APPROVED BY:	EXECUTIVE MANAGEMENT

1. OBJECTIVE

MPRL E&P is committed to conducting business in accordance with all applicable laws, rules and regulations, and to the highest ethical standards.

We recognize that directors, employees and other personnel including, but are not limited to, agents, contractors, vendors, consultants, and secondees who work on behalf of MPRL E&P can be subject to corrupt behaviors that involve offers of, or requests for bribes, facilitation payments or grease payments.

To achieve our objective:

- MPRL E&P has 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 MPRL E&P is prohibited and will not be tolerated.
- MPRL E&P will not engage in corrupt business practices.
- MPRL E&P will, at a minimum, comply with all applicable laws, regulations and standards which include, but are not limited to, the Myanmar Anti-Corruption Law 2013 (as amended) ("**MACL**"), the Tenth Principle of the UN Global Compact ("**UNGC**"), the US Foreign Corrupt Practices Act 1977 (as amended) ("**USFCPA**"), and the UK Bribery Act 2010 (as amended) ("**UKBA**") all of which are applicable to MPRL E&P, its employees and other personnel who work on behalf of MPRL E&P.

2. APPLICABILITY

This policy is applicable to all directors, officers, employees, advisors, consultants, contractors, subcontractors, suppliers, vendors, service providers, agents, joint venture partners, investors, and other representatives of MPRL E&P, its subsidiaries and/or assets operated and/or managed by MPRL E&P and/or its subsidiary.

Breach of the MPRL E&P's Anti-Bribery and Corruption Policy by an employee, director, officer, advisor, consultant, contractor, subcontractor, supplier, vendor, service provider, agent or other representative of MPRL E&P, its subsidiaries and/or any assets operated and/or managed by MPRL E&P and/or its subsidiary, may result in disciplinary action, including dismissal and/or termination, and be subject to



other actions according to the applicable laws. MPRL E&P reserves the right to amend or update this policy as required from time to time.

3. COMMITMENT

To achieve this objective, MPRL E&P employees and other personnel who work on behalf of MPRL E&P shall commit to the following:

- Shall not offer, promise or make any payment or transfer anything of value, including the provision of any service, money, gift, facilitation payment, entertainment & travel or hospitality or any other advantage, and charitable contributions to anybody for the purpose of obtaining or retaining business.
- Shall not request, agree to receive or accept anything of value, including provision of any service, money, gift, facilitation payment, entertainment & travel or hospitality or any other advantage, and charitable contributions for an improper purpose or improper performance. To further reiterate, accepting invitations of a personal nature is prohibited for meals or entertainment from any contractor whose services are being offered in a current tender process or who may try to gain influence for a tender which is imminent. In special cases where a gift is made due to a religious or cultural celebration, all gifts offered and received shall be recorded by the Administration & Contracts Department. The Administration & Contracts Department shall keep a record of every gift received.
- The Compliance Department shall improve employees and other personnel's awareness of relevant bribery laws in Myanmar and appropriate international laws, and initiate anti-bribery and corruption training, which will cover corruption risks, and situations where they may be subject to unethical approaches.
- Politely refuse a request or an offer for a facilitation payment or a bribe, while carrying out duties.
- The Chief Compliance Officer (CCO) and/or Assistant Chief Compliance Officer (ACCO) will determine warranting actions. Any action taken will involve informing Executive Management and concerned Head of Department.
- Where possible and when required, MPRL E&P employees, including but are not limited to, directors, executive management, managers, heads of departments, officers and all staff members shall exert influence and share knowledge with contractors, vendors and Joint Venture partners to implement adequate policies and procedures to prevent bribery, and promote ethical standards throughout the supply chain.



3.1 Definitions and Key Concepts

Bribe; means without giving the consideration or reasonable price, with the purpose of bribery, receiving or giving money, property, gift, service fee, entertainment and other illegal benefit.

Corruption; means as follows:

- (a) Anyone, by misconduct of his designated duties or by any other way, gives, attempts to give, or accepting, obtaining and attempts to obtain bribes to/from someone, directly or indirectly, to perform something or to avoid performing something according to law, or to give someone legally entitled right or the right which is not legally entitled, or to incorrectly obstruct the right which is legally entitled.
- (b) Anyone, by breach of prevailing law, rule, regulation, procedure, causes damage and loss of money, property and possession of the State, in handling and administration process of public funds of the related government department/organisation, public organisation or other organisation, or in requesting, acquiring, administration and liquidation of their possession, or by participating in and administration of a contract related to them.

Facilitation Payments; small payments are made with the purpose of expediting or facilitating the performance by a Public Official of a routine governmental action and not to obtain or retain business or any other undue advantage.

Public Official; officials or employees of any government or other public body/entity, agency or legal entity, at any level, permanent or temporary, appointed or selected, including officers or employees of state-owned enterprises, officers or employees of enterprises which are mandated by a public body or a state-owned enterprise to administrate public functions, a member of a political party, a political candidate, an officer of a public international organisation.

Third Parties; means any individual or organisation we contact during the course of our work or the contract term for MPRL E&P business. This includes actual and potential customers, suppliers, business contacts, intermediaries, government and public bodies, including their advisors, representatives and officials, politicians and political parties.



3.2 Gifts, Entertainment and Hospitality

This policy does 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 areas and approved by CCO, for all expenditures incurred related to gifts, entertainment and donation/contribution. All occurrences must be recorded in the register at the Administration & Contracts Department accurately, and it will be reviewed by CCO or delegated person of CCO twice a year.

MPRL E&P staff members 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).

3.3 Facilitation Payments

The USFCPA creates an exemption for facilitation payments whereas the UKBA makes no such exception, 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 ACCO through your Head of Department as soon as possible. CCO or ACCO will take appropriate action and report to Executive Management.

3.4 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 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.

3.5 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 CCO, it is permitted.

3.6 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 CCO only and which should only be bona fide, reasonable and documented expenses.

MPRL E&P will pay these travel and lodging expenses directly, if possible, rather than reimburse the Public Official, and it is advisable to notify the Public Official's employer that such expenses will be paid by MPRL E&P.

3.7 Reporting for Breach

Employees and other personnel who work on behalf of MPRL E&P are required to report immediately any request for bribes and facilitation payments, and any suspected or actual violation/breach of this policy to the CCO or Compliance Department or via the Whistleblowing Policy.

3.8 Non-retaliation

Employees and other personnel who work on behalf of MPRL E&P shall not suffer any form of retaliation, reprisal or detriment from MPRL E&P for raising a concern or reporting in good faith a violation of this policy. In addition, employees and other personnel shall not suffer any form of reprisal from MPRL E&P for refusing to make a corrupt payment.

3.9 Clarifications (or) Questions (or) Advice

If you require any clarifications (or) have any questions with regard to this policy, you may seek advice from or discuss with the respective supervisor or Head of Department (HoD) or any appropriate member(s) of the



Whistleblowing Review Committee (WBRC) or CCO. You can provide any feedback, opinions, suggestions and advice regarding this policy directly to the HoD of the Compliance Department and with a Carbon copy (Cc) to HoD of your Department and ACCO.

4. ACCOUNTABILITY

The CCO and/or ACCO are the main points of contact regarding compliance, with responsibility for day-to-day administration and oversight of this policy. The Material and Logistics Manager and/or Admin & Contracts Manager (or) Assistant Admin & Contracts Manager will assist with record keeping. MPRL E&P Executive Management is accountable for the implementation of this policy.

5. REVIEW, MONITORING AND REPORTING

This policy will be reviewed by the Compliance Department every two years to ensure that it is aligned with changes in our business and external environment, including changes in the national context and legal requirements. Training will be provided to MPRL E&P staff members and contractors to better understand ethical practices against corruption and bribery. Regulatory & Compliance Risk Officer will conduct the appropriate level of due diligence in cooperation with the respective departments and under supervision of the CCO and/or ACCO before entering into a business relationship with Third Parties, in accordance with the Third Party Due Diligence Policy to evaluate potential compliance risks to ensure that MPRL E&P only enters into a business relationship with reputable and qualified individuals and firms. Audits of sites, operating units, and contractors may be conducted internally by MPRL E&P or externally by retained third parties. Audit documentation shall include performance improvement action plans and ensure that requirements of this policy and related procedures are met. Further assistance will be obtained from professional and external organizations to provide guidance and support as and when required.