



ORGANIZATIONAL
**CODE OF
CONDUCT**
2025

MPRL **E&P** Pte Ltd.
Compliance Department



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1. Our Organizational Code of Conduct

Our Organizational 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 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 Pte Ltd ("MPRL E&P"), its subsidiaries and/or assets operated and/or managed by MPRL E&P and/or its subsidiary.

2. Introduction

During the last three 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 to the highest standards of ethics, legitimacy and transparency, guided by a clear sense of social and environmental responsibility. We believe the growth of our organization 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 communities we operate in.

3.3.2 Social Responsibility

Endeavoring to promote sustainable development across the company's activities through dialog 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, Environmental Performance and Biodiversity

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](#), [Environmental Policy](#) and [Biodiversity 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, Environmental Management Plan and Biodiversity Management 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 adverse impact on the environment and biodiversity whereby everyone is responsible for working safely and protecting adverse impact on the environment and biodiversity.

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 work-related incidents
- No harm to people
- Compliance with all applicable OHS legislation and regulations

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.
- Be in Compliance with all applicable Environmental Conservation Laws and Regulations
- Continuously Improve Environmental Management

5.3 *Protect Biodiversity*

We are dedicated to environmentally and socially responsible operations, striving to minimize environmental adverse impact through initiatives that support the United Nations Sustainable Development Goals, with a particular focus on biodiversity and ecosystem conservation in our operational sites and surrounding areas, as set forth in our [Biodiversity Policy](#). We aim to:

- Minimize our adverse impact on biodiversity by applying the mitigation hierarchy rigorously,
- Give priority to avoiding and minimizing potential adverse impacts on habitats and species during Project Design, Construction and Operations,
- Aggressively restore and provide offsets / enhancements and conservation measures as required.

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*

As a responsible investor, we are committed to integrating social responsibility into our core operations to enhance sustainable development and support the achievement of the United Nations Sustainable Development Goals (UN SDGs). In alignment with our [Corporate Social Responsibility Policy](#), we uphold **ethical business practices** by conducting our operations with integrity, transparency, and respect for human rights, as outlined in ISO 26000. Through **stakeholder engagement**, we foster meaningful dialogue to understand community expectations and concerns, ensuring inclusive and participatory decision-making. We promote **environmental sustainability** by minimizing adverse

environmental impacts, improving resource efficiency, and supporting biodiversity conservation in line with relevant UN SDGs. In the area of **community development**, we build and maintain mutually beneficial relationships with host communities and contribute to their socio-economic growth through responsible investments and community initiatives. All our activities are carried out in a sustainable manner, guided by our core values of honesty, partnership, accountability, and integrity, and with full respect for cultural, national, and religious diversity.

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. Therefore, we implemented the [Land Acquisition Policy](#).

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:

- Develop land acquisition or land use procedures and other compulsory procedures in accordance with national and international standards.
- 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.
- Develop a resettlement action plan (RAP) where appropriate, in order to manage the potential risks impacting people affected by the operation and when necessary, to justify their displacement.
- Continuous engagement will take place to ensure affected people are consulted and are involved in resettlement planning to ensure that the mitigation of adverse effects as well as benefits of resettlement are appropriate and sustainable.

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 Universal Declaration of Human Rights in all of its spheres of influence. We continuously monitor and address the environmental impacts of our business operations and strive to create positive impacts through active engagement and strategic community investments.

This [Human Rights Statement and Policy](#) is applicable to all aspects of our operations, integrating respect for human rights with our Corporate Principles, Values, and Commitments. It aligns with our [Environmental Policy](#) by promoting environmental responsibility and contributing to biodiversity conservation. It incorporates our Security Principles by applying the Voluntary Principles on Security and Human Rights to ensure respect for human rights while maintaining a secure environment. Our [Community Investment Policy](#) supports human rights and sustainable development through active engagement and investment in local communities. Our Human Resources Policies ensure fair treatment, equal opportunity, non-discrimination, employee welfare, professional development, employee rights, and compliance with labour laws and regulations.

Community Rights:



MPRL E&P strongly encourages employees, partners, contractors, Non-Governmental Organizations 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 child, forced, trafficked or compulsory labour;
- 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 organization, where such rights are recognized by law.



Anyone who has information on human rights abuses committed by the company's stakeholders can report through the company's Whistleblowing Manual.

8. Anti-Bribery and Corruption

According to our [Anti-Bribery and Corruption Policy](#) (“ABC Policy”), 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.

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.

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 the Chief Compliance Officer (“CCO”).

However, our 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).

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 2013 (as amended), the Tenth Principle of the UN Global Compact, the US Foreign Corrupt Practices Act 1977 (as amended) and the UK Bribery Act 2010 (as amended) all of which are applicable to us, its employees and other personnel who work on behalf of MPRL E&P.



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 Head of Department ("HoD") as soon as possible. CCO or ACCO will take appropriate action and report to Executive Management.

8.3 Contributions and Donations

Political Donations or Contributions; we 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; we 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.

8.4 Political Activity

We 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.

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 our 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.

We 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 us.



9. Anti-Money Laundering

We comply with applicable laws which prohibit money laundering. Money laundering includes, but is not limited to, any of the following actions:

- 1) converting or transferring money or property, knowing or suspecting that it comes from criminal activity, in order to hide its illegal origin or to help someone involved in the crime avoid legal consequences;
- 2) hiding or disguising the true nature, source, location, movement, ownership, or rights related to money or property known or suspected to be proceeds of crime;
- 3) receiving, possessing, or using such money or property while knowing or having reason to believe it came from criminal activity; or
- 4) taking part in or supporting these actions in any way, including assisting, facilitating, managing, advising, joining a group, or attempting or conspiring to commit any of the above activities. To help prevent money laundering:
 - Know our business partners and counterparties
 - Follow all applicable Company policies and procedures
 - Although we are a non-financial enterprise, any suspicious transactions related to money laundering are to be reported to respective authorities in accordance with applicable legislation.

10. Raising and Reporting Your Concerns

If you have any concerns that are in the public / Company interest related to Company's business, you must report immediately as per our [Whistleblowing Manual](#). You can submit your concern using the methods described in the following link:

<https://mprlexp.com/contact-us/whistleblower-reporting/>



Concerns raised in the public / Company interest related to the Company's business may relate, but not be limited, to:

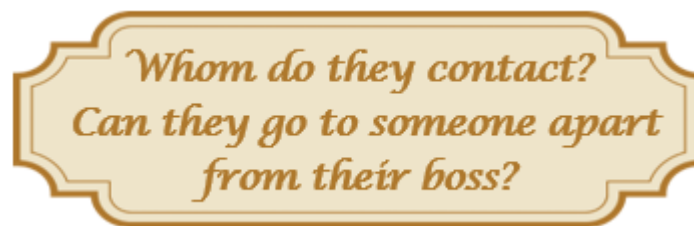
Breach of the MPRL E&P Organizational Code of Conduct and Policies, provided that for those concerns mentioned below only.

- Failure to comply with legal obligations
- Corruption and fraud
- Financial / Accounting malpractice
- Access without permission / Misuse of company properties or information
- Damage to the financial benefits and reputation of MPRL E&P
- Unethical behavior or improper conduct related to public / Company interest related to the Company's Business
- Harassment and other HR related issues in breach of applicable laws
- Potential or actual damage to the environment, and safe and healthy working environment
- Third parties' concerns relating to public / Company interest related to the Company's business
- Retaliation against a person who reports an activity ("**Whistleblower**") that he/she reasonably believes to be illegal, fraudulent or misconduct
- Willful negligence of information relating to any of the above

In addition, you can advise on how to effectively improve the Compliance and Ethics Program.

To achieve our objective, we:

- **Encourage** those working for MPRL E&P, including third parties, to speak up and report suspected wrongdoing or misconduct 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 **strict confidentiality** and that reports can be made anonymous, if desired.
- Reassure potential whistleblower that they are **able to raise concerns** in the public / Company interest related to the Company's business **without fear of reprisals**, even if they turn out to be mistaken, provided that which is not maliciously raises a matter that is known to be untrue.



Seeking Advice or Reporting; If there is a concern about a wrong doing or an unethical behavior within the organization, the employee may seek advice from or discuss with or report to the respective supervisor or head of department 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
- Group Head of Internal Audit (GHIA), myint.m.swe@mprlexp.com
- Geoscience Manager (GGM), kyaw.s.win@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; details of the Review and Investigation process can be found in the clause 2.4 Detailed Process of the [MPRL E&P Whistleblowing Manual](#).

*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 / Company interest related to the Company's business, 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).

We will reasonably support both the Whistleblower raising a concern as well as to any persons against whom allegations have been made under this policy. However, this assurance will not be extended for a Whistleblower 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.

Recognition, Incentives and Rewards; we have established a plan for recognition, incentives and awards to promote compliance and ethics programs by encouraging employees to be mindful of compliance and ethical issues and to raise questions and concerns when they see something that is not right. Furthermore, to encourage participating in compliance and ethics activities vigorously, and providing comments, suggestions and advice effectively to improve compliance and ethics programs.

For detailed information, please visit to the Recognition, Incentives and Rewards section in our [Whistleblowing Manual](#).

11. Avoiding Conflict of Interest

Conflict of interest is a situation in which a person or organization is involved in multiple interests, financial or otherwise, one of which could possibly corrupt the motivation or decision-making of that individual or organization and which affects their ability to complete job duties, and their loyalty to MPRL E&P.

From the company's perspective, 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 (if any) 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. Once disclosure form has been received, Compliance Department will keep respective superior or HoD informed accordingly.

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

Commitments & Regular Submission
<p>All employees and relevant persons;</p> <ul style="list-style-type: none"> • commit to identify, disclose, manage and monitor conflicts of interest • shall complete the <i>Conflict of Interest Disclosure Form</i> (“CoID Form”) every two years or after completion of revision of Conflict of Interest Policy and awareness training sessions, disclosing whether they have any financial, personal, and other interests and relationships that may present a conflict of interest, or whether there is no such conflict.

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.

Substantial Interest
<p>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 stocks/shares of a business/company. Less than 1% is not a Substantial Interest.</p>



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, 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 or retaining the services as a charity from MPRL E&P, he or she shall disclose that interest and shall seek permission from CCO before engaging in any discussions with MPRL E&P concerning charitable contributions to that party.

12. 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 HoD, or Group Head of Internal Audit, or Whistleblowing Review Committee (WBRC), or Chief Compliance Officer. You may also report your concerns anonymously via the Whistleblowing Manual.

Intellectual Property Protection; any intellectual property, such as trademarks, copyrights, patents, trade secrets and any work created by an employee in the course of employment at MPRL E&P shall be the property of the company, and the employee is deemed to have waived all rights in favour of the company. Work, for the purpose of the Code, refers to written, creative or media work. All source material used in presentations or written documents must first be granted permission for access from Executive Management.

The protection of confidential business information and trade secrets is vital to the interests and the success of MPRL E&P. Such confidential information includes, but is not limited to, the following examples.

- Compensation data
- Computer processes
- Computer programs and codes
- Financial information
- Pending projects and proposals



- Propriety production processes
- Research and development strategies
- Scientific Formulae
- Scientific data
- Scientific prototypes
- Technological data
- Technological prototypes

Accounting and Internal Control; We keep our financial and accounting books, records, transactions, and accounts in accordance with the Departmental Accounting Manuals (A-6 and Mann Field) and the generally accepted accounting principles of all business transactions and proper 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 & Invention 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.

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

In addition to the policies, briefly mentioned above, all employees are responsible to comply with all other Policies, Instructions & Office Orders, including, but not limited to, HR Policies and Staff Handbook, as mentioned on the MPRL E&P intranet portal & webpage, Departmental Accounting Manuals including the Approval Matrix for Procurement, Purchase Order and Payment, and other departmental issues at the intranet portal in addition to the Code.

Some of extraction are mentioned as follows.

Extraction of HR Policies

Harassment; defining harassment precisely is not easy, but it includes:

- Sabotaging someone's work on purpose.



- 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.
- Commenting derogatorily on a person's ethnic heritage or religious beliefs.
- Starting or spreading rumours about a person's personal life.
- Ridiculing someone in front of others or singling them out to perform tasks unrelated to their job (e.g. bringing coffee) against their will.

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 you are being harassed, you have multiple options for reporting the issue. You can attempt to address it directly with the offender for minor issues, reach out to your supervisor or department head, confidentially report it to Compliance or HR, or even contact Executive Management directly.

Unacceptable Behavior: although there is no way to identify every possible violation of standards of conduct, the following is a list of ordinary and serious misconducts which will result in oral/written warning up to dismissal.

Ordinary Misconduct / Offence

If the employee violates the ordinary misconduct / offence, the procedures of disciplinary actions are as mentioned above. The employee shall be given a written warning for the first violation, another written warning for the second violation and then sign a Letter of Undertaking for the third violation. In the event of any further violation within twelve months after the third violation, the employer may terminate the employment of the employee without payment of severance pay. If the employee does not commit any further violation within twelve months of the third violation, all previously committed violations shall be cancelled.

Grave / Serious Misconduct / Offence

The employees acknowledge to follow, and are fully aware of, the basic work discipline specified in the Employment Contract (EC). They also agree and recognize that penalties apply if any terms in Staff Handbook are violated. In case an employee violates the grave / serious misconduct / offence, he/she will be punished by dismissal without notice pay and severance pay according to the signed EC.

Alcohol & Substance Abuse Policy: We are committed to providing a safe, healthy, and drug- and alcohol-free work environment for all its employees, contractors, visitors, and partners. We maintains a strict policy on the use and

consumption of drugs and alcohol to any person traveling to, working or visiting onshore and offshore workplaces. This policy includes the following:

- Zero Tolerance to drug or alcohol use in the MPRL E&P premises.
- Emphasis on the organization's commitment to maintaining a drug and alcohol-free workplace.
- Compliance with all applicable Myanmar Legislation associated with Drug and Alcohol rules and regulations.

Extraction of Acceptable IT Usage Policy

- Company IT equipment and systems are provided for business use only, with strictly limited personal use permitted only during breaks and without impacting work or operations.
- Storing or circulating improper material (e.g., personal media, unlicensed software, or offensive content) on company devices or networks is prohibited, and all critical data must be stored on designated locations.
- Email and internet use are monitored to prevent inappropriate or excessive activity, including spam, phishing, unauthorized downloads, streaming, or accessing inappropriate sites. Violations may result in access being blocked or disciplinary action.
- Any changes in access to MPRL E&P GoC IT Systems are required; Must inform the IT focal person or MIS team with approval from HoDs, and ensure proper use of relevant request forms in advance.
- Compliance with the “**GoC Acceptable IT Usage Policy**” is mandatory, including secure password practices, data protection, and reporting suspicious activities to the MIS team via helpdesk@mprlexp.com.

Extraction of 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.

Please contact MPRL E&P Administration & Contracts Department to access “GoC Acceptable IT Usage Policy” and “MPRL E&P IT Security Policy and Procedures”.

Extraction of others

Telephone Usage; the use of international direct dial telephones is strictly limited to MPRL E&P Executive Management or their delegated official users, and must be exclusively for essential business purposes. 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.

Other staff who need to make an international phone call for business purposes may request the Reception to make the call. The phone call will be logged in the register by the Receptionists.

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; we recognize 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.

14. Implementation, Review, Monitoring and Reporting

To ensure the successful implementation of the Code, we will:

- Provide 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 Whistleblowing Report Form for easy access.

- Cascade and send e-mails to all employees through respective HoD to introduce the Code (as amended).
- Conduct formal training sessions 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-Orientation sessions.
- Arrange a training recording by “MS Team”, and cascade to all employees through HR and/or training focal persons to indicate where employees can access the Code training recording by “MS Team”.

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 HoD 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 Organizational 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 Organizational 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 Manual.

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 the Code, Policies, Instructions and Office Orders 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.

Please visit the link below to review the Organizational Code of Conduct, Manual, Policies, and Procedures of MPRL E&P:

<https://mprlexp.com/sustainability/policies-procedures/>

*Approved by the Senior Executive Management of MPRL E&P Pte Ltd. on 19 May 2017
Revised and approved by the Senior Executive Management of MPRL E&P Pte Ltd. on 14 June 2019
Revised and approved by the Senior Executive Management of MPRL E&P Pte Ltd. on 14 July 2025*