

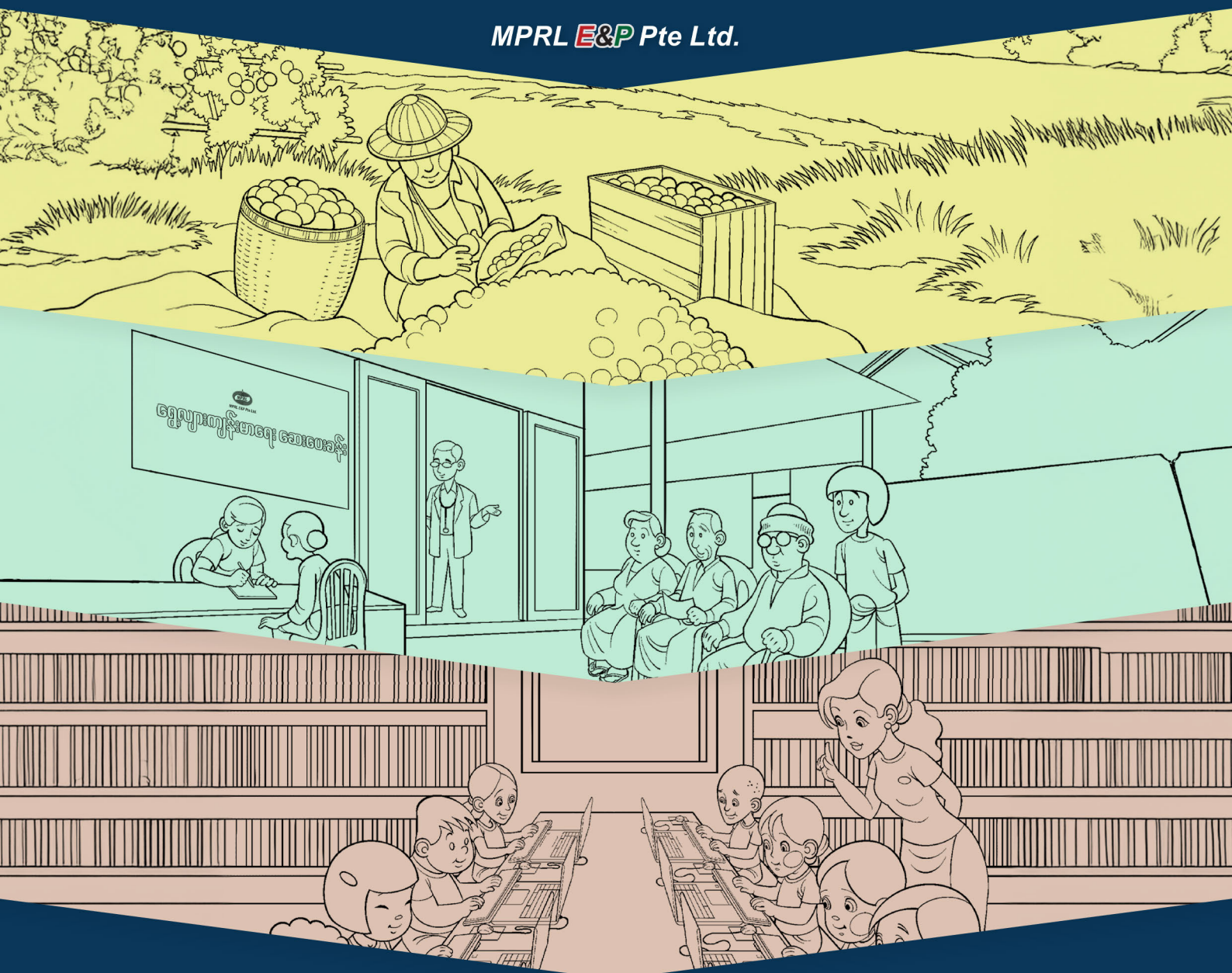


Local Community

Operational Grievance Mechanism

(FY 2025-2026)

MPRL E&P Pte Ltd.



DOCUMENTED GRIEVANCES FROM

Mann Field

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① Objective

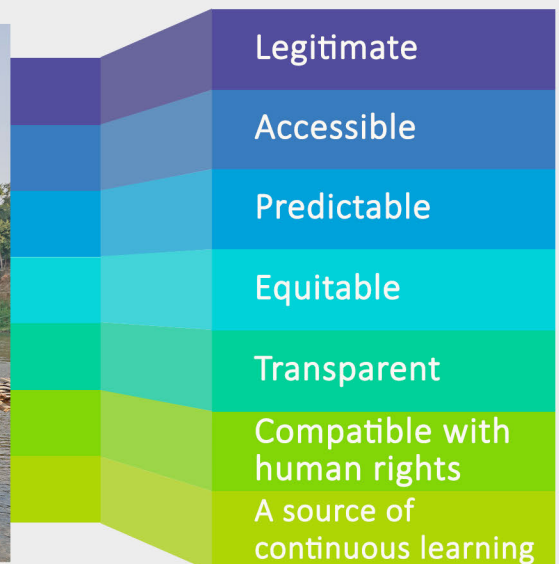
The operational grievance mechanism (OGM) is a formal, private avenue for the host communities consisting of 14 hamlets and villages in Mann Field – where MPRL E&P undertakes hydrocarbon exploration and production activities in cooperation with Myanmar Oil and Gas Enterprise (MOGE) – to raise environmental 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

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.



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.”

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



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);
Senior Advisor, 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.



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.



On 25 January 2025, we commemorated a decade of our Operational Grievance Mechanism (OGM) with a vibrant community event in front of the Aye Mya Community Center. The celebration, themed “Celebrating 10 Years of OGM: A Night of Unity, Fun, and Family,” brought together 723 people, including 415 children from Mann Field Communities.

The event served as the annual awareness-raising campaign for the OGM, a key platform established in 2014 to ensure that community grievances are addressed transparently and effectively. The campaign continues to play a vital role in helping local communities understand how grievances are managed, the types of remedies available, and the overall grievance resolution process and timeframe.



Attendees enjoyed a range of interactive activities, including food stalls, face painting, storybook coloring, educational Q&A sessions, and knowledge-sharing sessions hosted by the Field Operations and HSE teams. The celebration also featured a community play based on real OGM stories, followed by a movie screening under the night sky.



⑧ OGM Procedures, Roles & Responsibilities

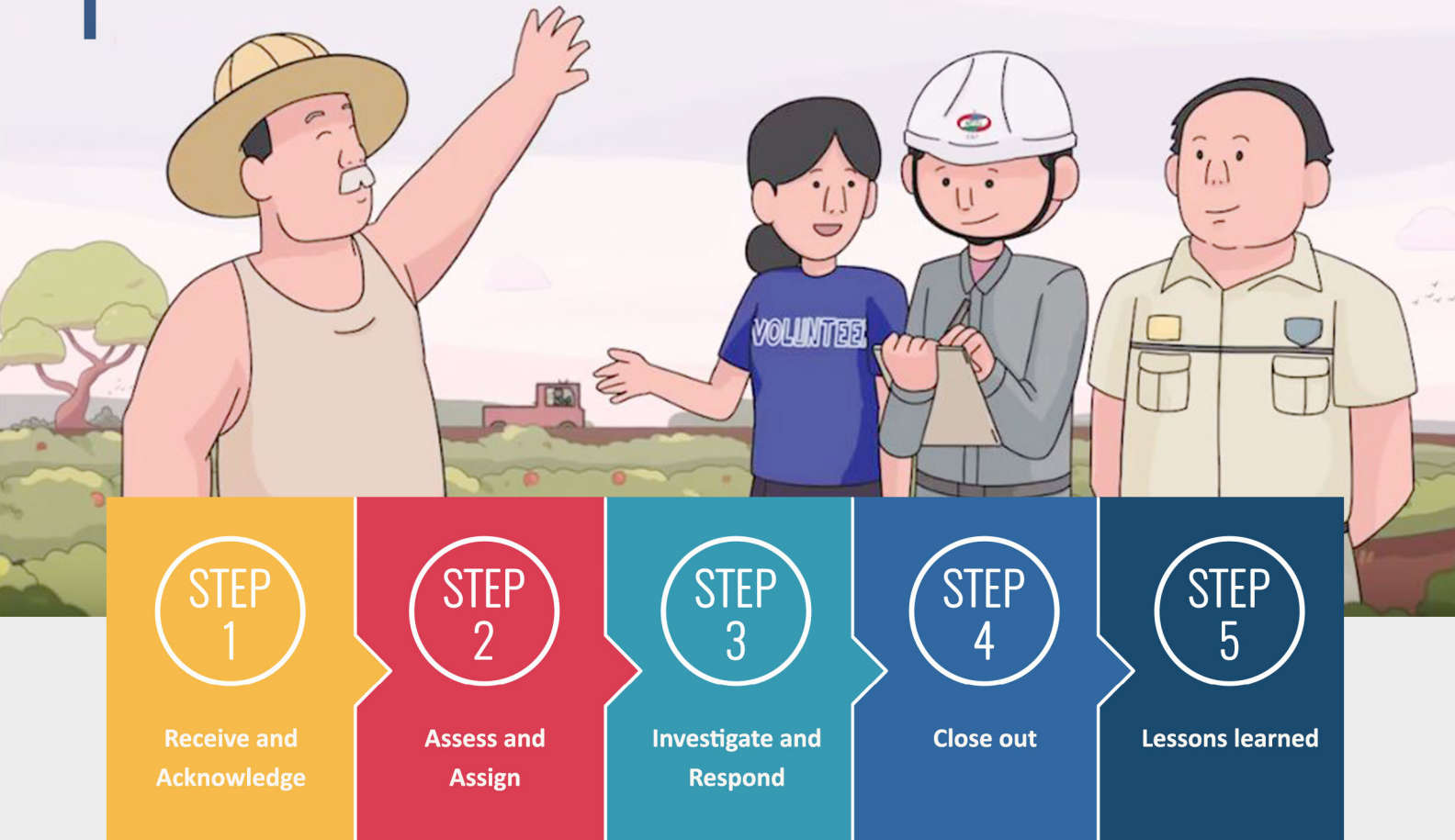


Figure 1. Illustration of Our 5-Step OGM Procedures

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 Personnel 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 Personnel 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.

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.

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MPRL E&P Pte Ltd. က အကောင်အထည်ဖော် ဆောင်ရွက်လျက်ရှိတဲ့ အကြံပြုဆွေးနွေးခြင်းဆိုတာ

ကျွန်းကျပ်ရင်းဆောင်ရွက်မှုနဲ့ ဆက်စပ် ပတ်သက်နေတဲ့ လူ့အဖွဲ့အစည်းအတွင်း က တစ်နိမိတ်ပေးတာ (ပိုမိုပျက်စီးမှု) အပေါ် အထူးအရေးကြီးတဲ့ အကြံပြုချက်တွေ၊ တောင်းဆို ဆွေးနွေးချက်တွေကို ဆက်သွယ် ပြောကြားခြင်းကို ခေါ်ပါတယ်။

ကျွန်ုပ်တို့၏ လုပ်ငန်းဆောင်ရွက်မှုကြောင့် ဖြစ်ပေါ်လာသည့်

- မြေခွဲစိတ်မှုကြောင့်
- သင့်ယာခင်းတွင် သိမ်းပိုက်မှုကြောင့်
- သင်မှာကျန်ခဲ့သော ဆွေးနွေးချက်ကြောင့်
- စေတနာ့ဝန်ထမ်းများထံမှ တဆင့် အကြံပြုဆွေးနွေးချက် ရေးသားပေးပို့ခြင်း
- နေရာနှင့်ပတ်သက်သည့်
- လျှင်စေ့ပါးအကြံပြုချက် ချမှတ်ခြင်း
- လူမှုအကျိုးပြုလုပ်ငန်းများတွင် ချုပ်ဆိုချက်များ မျှတမှုမရှိမှု ယူဆချက် (ပိုမိုပျက်စီးမှု) ဝန်ထမ်းများ၏ ဆက်ဆံရေး ပြေငြိမ်ရေး
- ကုမ္ပဏီ၏ တာဝန်ရှိသူများနှင့် တိုက်ရိုက်ဆက်သွယ် ဆွေးနွေးနိုင်ပါသည်။

အကြံပြုဆွေးနွေးလိုပါက
MPRL E & P Pte Ltd.

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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

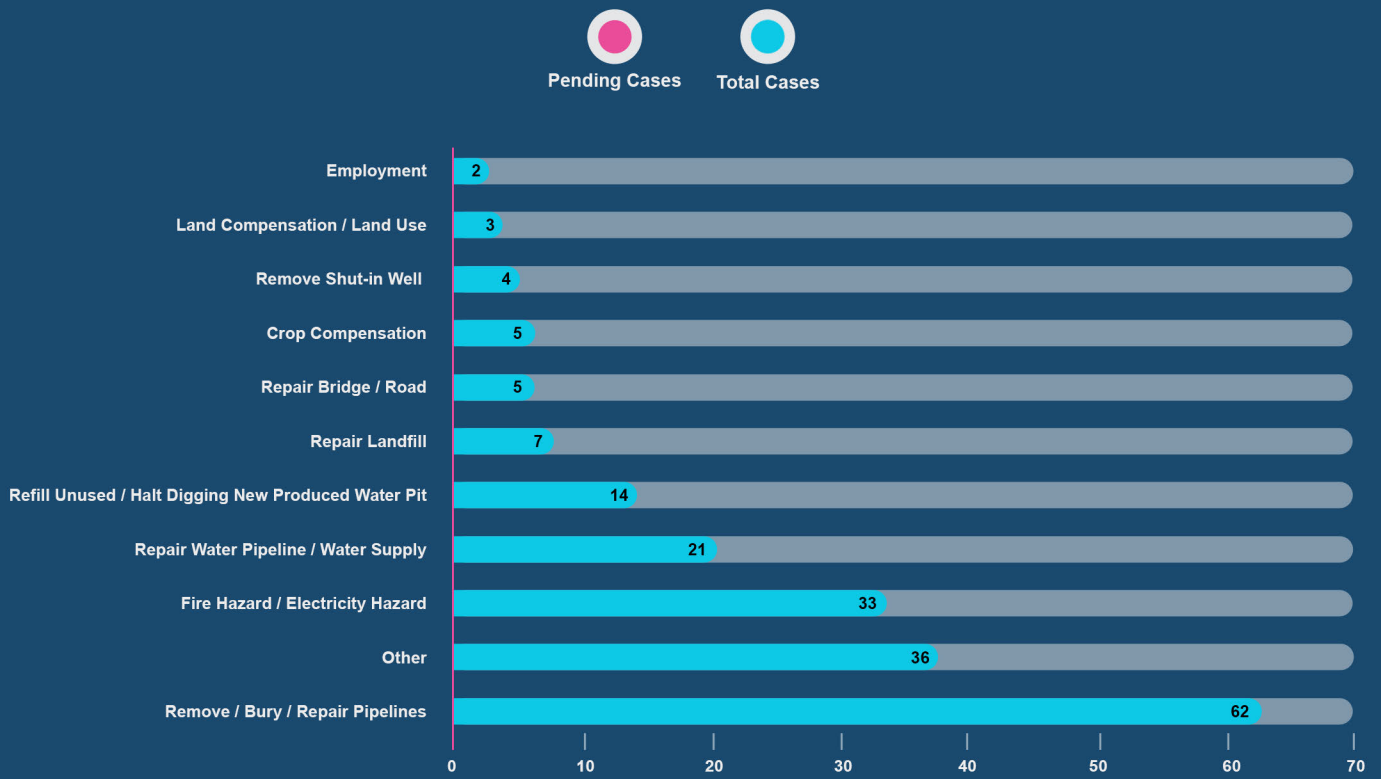


Figure 3. Types of OGM cases received and closed out from September 2014 – December 2025

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 2025.

Of the 192 complaints received by the OGM from September 2014 through December 2025, 43% were submitted directly by complainants and 57% 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.



43%

were submitted directly by complainants

57%

were referred by our local staff



OGM Cases Register by Calendar Year from September 2014 - December 2025



Figure 4. Complaints received and closed out from September 2014 – December 2025

Select Cases

1. Complaint 202501-01

The complaint was filed with the OGM by community member. A leakage in the water pipeline connects GIP to the fire water pump in her farmland, resulting in difficulties in cultivating. She requested to inspect and repair it. The case was registered under the category of 'Repair Water Pipeline/Water Supply'.

Resolution

A site inspection was made and the leakage was found and repaired. The case was closed with 2 days from receipt and the complaint was satisfied with the process and outcome. The CSR team facilitated the process until a suitable resolution was agreed and implemented.

2. Complaint 202505-01

A complaint was filed with the OGM by community member. The unused pipeline in her farmland causing difficulties in cultivation. The complainant requested that a site inspection be made to investigate and take necessary action.

Resolution

The case was investigated and the unused pipeline were removed. The case was closed within 1 day from receipt and the complaint was satisfied with the process and outcome.



⑪ Year 10 and Ahead: Adaptation, Resilience, and Continuity

Marking a decade of implementation, MPRL E&P's Operational Grievance Mechanism (OGM) stands as a symbol of the company's continued commitment to sustainable operations, lasting positive impacts on local communities, and alignment with global sustainability goals. Over the past 10 years, the OGM has evolved to meet the needs of communities and adapt to Myanmar's changing political landscape. Whether operating under democratic governance or during a state of emergency, the mechanism has proven its resilience by adjusting communication and operational strategies to remain effective and inclusive.



In times of heightened regulatory and security challenges, the OGM has helped MPRL E&P maintain transparency and accountability. The mechanism supports the company's adherence to the Voluntary Principles on Security and Human Rights (VPSHR), ensuring that operations respect human rights while remaining stable and secure.

In the current challenging socio-political environment, the OGM has become a critical channel for promoting mutual understanding and constructive dialogue. By addressing grievances fairly and promptly, it fosters trust and cooperation—key elements in the company's drive toward sustainable, community-centered development.

Now in its tenth year and looking ahead, the grievance mechanism continues to adapt to new challenges. It remains rooted in the principles of fairness, transparency, and responsiveness, and plays a vital role in helping the company uphold its social license to operate. By resolving concerns, preventing conflicts, and

strengthening community relationships, the OGM directly contributes to MPRL E&P's long-term sustainability. It not only supports local development but also reinforces the company's alignment with broader global sustainability frameworks.

In essence, the grievance mechanism reflects MPRL E&P's enduring dedication to responsible business practices. As the company continues its journey, the OGM will remain central to fostering resilience, protecting stakeholder trust, and delivering meaningful, lasting change in the communities where we operate.



U Tin Thaung

(Mei Bayt Kone Village)

As a member of the Village Development Committee, I've become very familiar with the MPRL E&P CSR program in our community, including the Organizational Grievance Mechanism (OGM). I first learned about it when it was introduced in our village, and the pamphlets they provided helped me understand it more clearly.

Whenever I need to submit a grievance, I usually go through our village volunteer, following the step-by-step process. But in urgent cases—like those involving fire or electricity issues—I contact the MPRL E&P CSR office directly by phone. After submitting a case, the CSR team always comes to the location to inspect, gather details, take photo evidence, and then coordinate with the relevant departments quickly. I've seen many cases resolved on the same day. For cases that require coordination with MOGE or other entities, the team explains the process clearly and follows up until it's resolved.

Having this kind of mechanism is incredibly helpful for us. In the past, we didn't know where to report our concerns. Now, with the OGM in place—along with its clear procedures and prompt responses—we feel supported and heard. I'm very thankful to MPRL E&P for implementing such an effective system.

Because of my experience using the OGM, I also help others in the village understand how to use it and encourage them to report any issues. From my perspective, the mechanism is well-structured and working perfectly. I have no further suggestions—just gratitude.

INTERVIEWS



Daw Hnin Yu Khaing

Volunteer
(Mei Bayt Kone Village)

Since becoming a village volunteer, I have actively participated in various CSR activities, particularly supporting the Organizational Grievance Mechanism (OGM). I have served as a bridge between the company and the village, doing my best to support both sides. As a volunteer, I explained the OGM process to community members, distributed pamphlets, posted announcements on the village signboard, and encouraged villagers to attend the 10th Year Anniversary of the OGM program. Whenever a villager raised a concern, I explained the proper steps to submit an OGM case and informed the CSR team accordingly.

When CSR and other relevant staff visited the village to assess cases, I guided them to the location, took photos, and joined the discussion between the CSR team, village administrator, and villagers. I also served as a witness to the case. Throughout the resolution process, I accompanied the CSR team to the site and assisted as needed. Once the case was resolved, I supported the closure of the OGM form by helping the complainant express their satisfaction and assisting the CSR team and village administrator with final documentation.

I am honored and proud to have participated in the entire OGM process. It is deeply fulfilling to contribute to resolving the challenges our villagers face. Many villagers have shared their appreciation for the OGM approach, noting how effectively and promptly their concerns were addressed. In the past, people didn't know how to voice their issues or who to turn to. Now, thanks to the MPRL E&P CSR Program and its initiatives like the OGM, our communities have access to development support and a trusted platform to raise their voices. I would like to express my sincere gratitude to the CSR team and everyone involved in the OGM process for making such a positive difference in our village.





Daw Yin Mar Aye
(Auk Kyaung Village)

I first became aware of the MPRL E&P CSR Organizational Grievance Mechanism (OGM) through village awareness campaigns. At the time, I didn't fully understand the process, but later, the pamphlets distributed in the village and explanations from village volunteer helped me learn more.

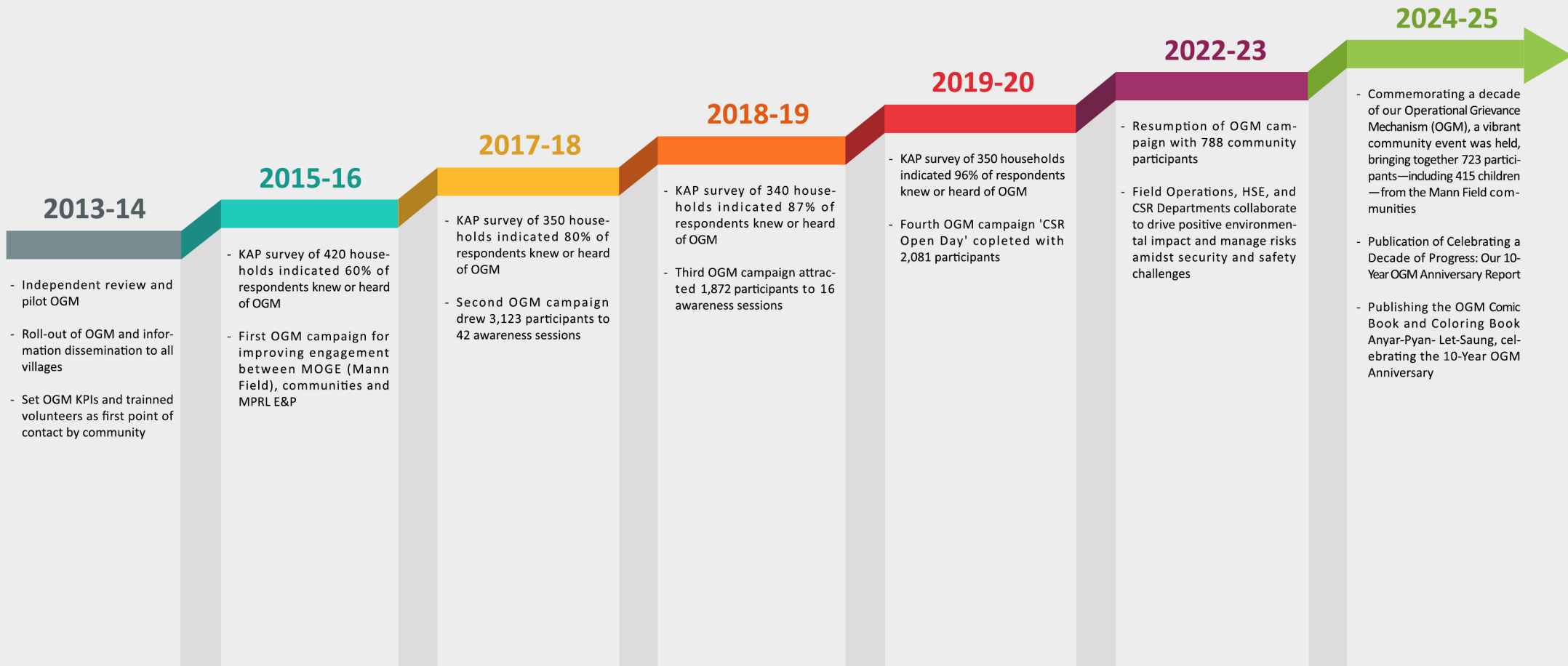
One day, I discovered a water pipeline leak in my farmland that threatened my crops. I remembered the OGM and approached our village volunteer, Ma Myint Myint Khaing, to submit a case. She immediately contacted the CSR team. The CSR staff arrived promptly, inspected the site, and explained the resolution plan, which involved coordination with MOGE, as the pipeline belonged to them. The next day, MOGE staff located the leakage and repaired it.

I was impressed that the team responded within one day and the issue was resolved in just one to two days. It showed that the MPRL E&P CSR team takes our concerns seriously. I've submitted OGM cases several times and am now very familiar with the process. I've never faced any inconvenience and always encourage others in our village to use the mechanism if they face any issues.

Beyond the OGM, I truly appreciate the other development programs MPRL E&P CSR has implemented in our village. I'm thankful for their continued support and hope these efforts will carry on.



⑫ Historical Timeline of the OGM in Mann Field





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