



## Whistle Blowing Policy and Procedure for Parami Energy Group of Companies

PARAMI ENERGY GROUP OF COMPANIES is committed to a whistle-blowing policy where by employees may raise and report concerns in a transparent and effective manner. This policy is further designed to ensure complete anonymity and confidentiality of the whistleblower. This process ensures 1) strict confidentiality and 2) that the employee has no fear of malice, reprisal, or other potential disadvantages.

### 1. Introduction:

Whistle-blowing is defined as a process by which a person, such an employee, discloses information that is in the public interest. Usually, this information is disclosed to a public or regulatory body to provide evidence that her/his employer is partaking in unlawful or unethical practices.

This policy is concurrently aligned with the Company's Code of Conduct policy of which some overlaps will be seen. This Policy applies to all employees, officers and directors of the Company and its related subsidiaries or group of companies.

### 2. Procedure:

The following process facilitates an avenue for whistle-blowers:

- (a) **The Identification Phase:** In the event that an employee notices incidents of corruption, bribery, or any other type of unacceptable behavior, she/he will identify and take note of the issue(s). Forms of unacceptable behavior include:
  - (i) Corruption
  - (ii) Bribery
  - (iii) Fraud
  - (iv) Malpractice
  - (v) Abuse of position
  - (vi) Discrimination on the grounds of race, ethnicity, religion, culture, gender, sexuality.
  - (vii) Non-compliance with Parami's Code of Conduct and/or Human Rights
  - (viii) Other negative behaviors
  
- (b) **The Reporting Process:** the employee will raise the issue with the compliance officer verbally who shall commit the details in writing. Parami's current compliance officer is Mr. Myint Win, legal advisor. He may be reached at [mwin@parami.com](mailto:mwin@parami.com)
  - (i) Should the employee feel uncomfortable reporting directly to the Compliance Officer, she/he may approach any of the other 4 designated Parami counselors. These counselors can then bring the information to the legal officer and will work together with the legal counselor to follow up quickly and accordingly.
  - (ii) The other counselors include: U Zaw Win, Head of Drilling Business Unit, at [zwin@parami.biz](mailto:zwin@parami.biz); Daw Kyaw Kyaw Win, Head of Petroleum Processing Business Unit, at [kkw@parami.biz](mailto:kkw@parami.biz); U Khin Maung Oo, General Manager, at [kmo@parami.biz](mailto:kmo@parami.biz); and Aung Myat Moe, Parami Event Manager, at [event@parami.biz](mailto:event@parami.biz). Please refer to our Grievance Policy for more information.

- (c) **The Verification Process:** the compliance officer, upon receipt of the complaint, will acknowledge the issue and follow up accordingly. The complaint must be verifiable and justifiable. All details will be kept in strict confidentiality. In the event that the issue is grave enough for the immediate attention of senior management, the compliance officer will immediately bring this to the attention of the CEO so that the senior management may be involved and aware of the verification process.
- (i) In the event that a senior manager, such as the CEO or COO is involved in the issue, the compliance officer will direct the issue towards the independent board of advisors.
  - (ii) In the event that any member of the independent board of advisors is involved, the compliance officer will direct the issue to the CEO or COO.
  - (iii) The process will be discreet so as to ensure the whistle-blower will not be at a disadvantage.

Revised: Marga McElroy, Compliance Advisor, January 2018

# **SECTION 8**

## **WHISTLE-BLOWER POLICY**

**and**

## **PROCEDURE**