

1 January 2016

Human Rights Policy for Parami Energy Group of Companies

1. PARAMI ENERGY GROUP OF COMPANIES is committed to conducting business, operations, and projects with integrity, excellence, and professionalism. Our Human Rights Policy establishes a framework for this commitment. Parami Energy Group of Companies was started in 2004 with the aim of providing high quality services to our corporate and government clients in Myanmar. Parami has grown from engineering service provider to the Parami Energy Group of Companies ("Parami Energy"). Our core businesses include Oil and Gas, Power, and Construction.
2. Our Human Rights Policy is guided by the United Nations (UN) Declaration of Human Rights (See Annex A) and the UN Compact Initiative¹. **The Company is a member of the UN Compact since 2012.** Two of the key principles of Human Rights that The Company adheres to are as follows:
 - a. *"Businesses should support and respect the protection of internationally proclaimed human rights."*
 - b. *"Businesses should make sure they are not complicit in human rights abuses."²*
3. In addition, the Company agrees and is committed to follow the principles set forth by the Global Dignity Organization (See Annex B), a World Economic Forum initiative to promote human dignity (See www.globaldignity.org for more details). The principles of Global Dignity includes the following five principles:
 - a. *Every human being has a right to lead a dignified life.*
 - b. *A dignified life means an opportunity to fulfill one's potential, which is based on having a human level of health care, education, income and security.*
 - c. *Dignity means having the freedom to make decisions on one's life and to be met with respect for this right.*
 - d. *Dignity should be the basic guiding principle for all actions.*
 - e. *Ultimately, our own dignity is interdependent with the dignity of others.*
4. These principles and the policy apply to all employees, officers and directors of the Company and its related subsidiaries or group of companies.³ The Company incorporates these

¹ The UN Global Compact asks companies to embrace, support and enact, within their sphere of influence, a set of core values in the areas of human rights, labour standards, the environment and anti-corruption. For more information on the Principles on Human Rights, see <http://www.unglobalcompact.org/abouttheGc/TheTenprinciples/principle1.html>

² Complicity means being implicated in a human rights abuse that another company, government, individual, group etc is causing.

³ From 1 April 2014, Parami requires all employees to be aware of this policy. This policy, along with the company's code of conduct, would be included and specifically told to new employees during the orientation phase.

principles, as stated above, with its business partners and take appropriate measures into contracts with suppliers, business partners and distributors. It would also place emphasis on monitoring key suppliers to environmental, health and safety standards, prohibitions against forced and child labour, and local and hour wages.

5. **Redress Policy.** Redress procedures are important to ensure fairness takes place. In addition, they can help address problems in the implementation of organizational policies and provide information to company management regarding policy design. All employees in Parami have the option to seek to redress via the Compliance (legal) Officer if they feel they have been unfairly treated.

The company management empowers the Compliance (legal) Officer of the Company to investigate risk profiles especially to those who have or had suffered grievances with regard to matters concerning their human rights. Employees may also discuss grievances through any of the selected counselors: U Zaw Win, Head of Drilling Business Unit, at zwin@parami.biz; Daw Kyaw Kyaw Win, Head of Petroleum Processing Business Unit, at kkw@parami.biz; U Khin Maung Oo, General Manager, at kmo@parami.biz; Aung Myat Moe, Parami Event Manager, at event@parami.biz; Hillary Strasser, Assistant CSR Manager at hillary@parami.biz Please refer to our Grievance Policy for more information.

The role of employees is to ensure that the Company respects human rights within its spheres of influence. In order to carry out this responsibility, employees should:

- a. Respect the human rights of all persons they encounter in carrying out duties as a Parami employee.
- b. Do not be afraid to report unfair practices and/or abuses to the relevant authorities.
- c. Be alert to potential violations of human rights they may encounter within Parami, or when interacting with direct business partners or visiting their worksites.

6. **Employment Policy.** The following states the conditions of employees' rights:

- a. **Employee Remuneration.** Employee remuneration will be paid according to benchmarking and market practices. There will be provision of fair wages without any form of coercion or threats. Employees are hired, paid and otherwise subject to terms and conditions of employment based on their ability to do the job, not on the basis of their personal characteristics such as race, national origin, sex, religion, ethnicity, disability, maternity, age and other characteristics protected by the local law.
- b. **Freedom of Association and Collective Bargaining.** Employees can freely choose whether or not to join associations for the purpose of collective bargaining as provided by the local law. Employees also have the right to bargain collectively, and can gather independently to discuss work-related problems and to participate freely in discussions related to company matters.
- c. **Non-Discrimination Policy.** Employees must practice a non-discrimination practice, which involves compliance to:
 - Respecting all races and religions.
 - Providing a safe working environment for all personnel.

- Prohibiting physical, sexual or psychological harassment to any person, group or nationality.

7. **Harassment and Abuse Policy.** The Company has a zero tolerance policy with regards to harassment and abuse of any kind (verbal, physical, sexual). Unwelcome advances, inappropriate communication, requests for sexual favours, unwelcome actions, as well as any other instance that contributes to an uncomfortable, intimidating, and/or hostile work environment, are **totally unacceptable**. Those who experience such types of harassment and/or abuse are highly encouraged to report to any of the 6 Parami counselors. These counselors will provide advise, and undertake the necessary steps to ensure that such harassment and abuse does not continue. Please refer to our Grievance Policy for more information.

8. **Health Safety and Environment Policy.** The Company ensures that all its workers are afforded safe, suitable and sanitary work facilities in the office and to employees working in the field areas. Adequate, clean and suitable housing will also be provided for its employees when required to do, i.e. engineers working for a construction project. The Company also supplies its employees with relevant protective equipment and training necessary to perform their tasks safely.

9. **Land Ownership Policy.** In the case of land purchase, the Company will consult with all affected parties, including both legal and customary owners in order to seek their prior informed consent. It has made a strong commitment not seek to any benefit from improper forced relocations, and that the due process would be followed in accordance to local laws, and if needed, adequately compensate inhabitants respecting their dignity and rights.

10. This policy is endorsed and takes effect as of 1 April 2014. It has since been updated as of 1 October 2015. It is subject to regular review by the Company, and it may be revised periodically to reflect changes in the Company's procedures.

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Approved By:



Pyi Wa Tun
CEO and Chairman
Parami Energy Group of Companies