

Communications Policy For Parami Energy Group of Companies



PARAMI ENERGY GROUP OF COMPANIES promotes discourse that is professional, honest, and with integrity. This **Communication Policy** aims to influence, guide, and regulate the various modes of communication used by employees in a company.

Introduction:

This policy measure establishes the parameters by which Parami Energy employees should communicate when using

(1) news media, (2) social media, and (3) interpersonal communication.

Employees should exercise fairness, proper courtesy, consideration and sensitivity in dealing with customers , colleagues and stakeholders

Employees must not disclose any confidential or private information obtained through her/his employment to third parties, and should share confidential or private information *only* with the Company management and other employees on a need-to-know basis.

This policy is aligned with the Company Code of Conduct, thus 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.

1. External Agencies and Public Communications

- A. News Media: The Company is committed to open and honest communication, but also is committed to protecting sensitive information and the corporate image. Employees must provide information that is truthful and consistent with Company policies regarding quality and confidentiality when providing information to the media or to the public. Company activities will be published through our website and media agencies, both in Myanmar and abroad.
 - (1) The Company's relationships with the media are conducted exclusively by the Chief Executive Officer (CEO) or as delegated by the CEO.
 - (2) If designated by CEO to deal with the media, employees should follow the guidelines established in Parami Code of Conduct, Section 5 (Privacy and Confidentiality) and Section 7 (Media and Public Relations).
 - (3) Employees must not comment on any aspect of the Company or publicly represent their own opinion as the Company's opinion to the media. If an employee receives an inquiry from the media, they must immediately report it to the Chief Executive Officer (CEO).
 - a. It is the usual responsibility of only the senior management to discuss the company's progress and challenges

- (4) Employees should follow the policy set out in Parami's Social Media Policy when posting any comments or photos of Parami activities, worksites or personnel at work.
- (5) Employees will seek permission before discussing Parami affairs with the press unless they have been specifically designated to do so by the CEO. Employees will seek permission before discussing current, potential and future Parami business affairs.
 - a. It is unacceptable for employees to disclose dishonorable content, such as racial, cultural, ethnic, sexual, religious slurs through news or media outlets.
- **B. Social Media:** This section has been superseded by Section 7 Parami Social Media Policy.
- **C. Interpersonal communication:** At Parami we encourage a respectful and cordial environment. Employees will, at all times, be sensitive to the different social groups of our company and country.
 - (1) Employees must be able to work in a workplace that is free from discrimination, physical, sexual, psychological, or verbal harassment or abuse, misuse of substances, and unsafe conditions.
 - (2) There should not be any belittling of any person or group at any time. There is zero tolerance for discrimination against a person or group based on her/his: ethnicity, religion, culture, gender, sexual identity, or political affiliation.
 - (3) There is zero tolerance for any kind of harassment (verbal or sexual). Any kind of communication (verbal, non-verbal such as physical touching or suggestive motions, or written in any form) that can be exploitative in any is strictly forbidden. Those who experience any such communication and/or interaction are highly encouraged to report such an incident by contacting any of the Parami counselors, If the employee does not feel comfortable bringing this to the attention of head management. Refer to Parami Grievance and Redress Policy for several choices of procedure to follow should this occur.
 - a. All employees must commit to helping create and maintain a positive work environment. This includes communicating in a respectful, cordial, and positive manner
 - (4) In the event that a Parami employee has breached this policy, she/he will be referred to the compliance officer. Parami's current compliance officer is U Myint Win, legal advisor. He may be reached at <u>mwin@parami.com</u>
 - (5) In the event that a Parami employee feels any type of discrimination, she/he can seek council with the compliance officer or a neutral counselor, as listed in the Parami Grievance Policy
- **D. Official Communications:** Parami management is responsible for all official communications. They may use traditional publishing, press releases, social media, website posts or other communication methods as deemed appropriate for the information and intended audience.
 - (1) Relevant and important events, such as speeches, training sessions, and conferences will be published for public viewing on the Parami website and Facebook page.

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- **E. Internal Communication:** Parami will submit relevant information for its employees through news bulletins and internal emails.
 - (1) Employees must not transmit or share confidential or private information to third parties without consulting the line manager and Document Control Department.
 - (2) Employees must use secure shred bins for disposing of documents with confidential or private information.

Revised by: Marga McElroy Compliance Advisor February 2018