



Grievance and Redress Policy and Procedure for Parami Energy Group of Companies

Introduction

This Grievance Policy provides a structure to identify and settle workplace disputes. Grievances are concerns, issues, complaints, and problems that occur in the workplace. They can be reported because of compelling circumstance to address a systematic concern, but they may also be considered 'smaller issues.' This policy establishes the multiple channels through which Parami employees can address grievances that may be experienced in the workplace.

This policy is aligned with the Company's Code of Conduct, therefore 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.

Parami is committed to a grievance policy where by employees may raise and report concerns in a transparent and effective manner. This process ensures

- (a) strict confidentiality and
- (b) that the employee has no fear of malice, reprisal, or other potential disadvantages.

Preventative Measures

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 employ the following behaviors and pro-active attitudes. They should

- (a) Respect the human rights of all persons they encounter in carrying out duties as a Parami employee.
- (b) Feel comfortable enough 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.

Potential Grievances

Employees are encouraged to:

- (a) Report evidence of injustice that caused by unfair practices in the work place.
- (b) Report on the neglect of a coworkers' duties that might cause harm to their own ability to accomplish their work or which could pose a health and safety concern.
- (c) Report instances of corruption, bribery, or other illegal activity.
- (d) Report on instances of harassment and assault of any kind (verbal, sexual, physical, etc).

Procedure

In the event of a grievance, employees should be guided by the following procedures.

All employees in Parami have the option to seek to redress through **two (2) channels** which are both formal and informal. Employees may raise concerns:

- (a) through any of the five (5) volunteer Parami Counselors. These counselors include Parami's Compliance/Legal officer, Parami's Acting HR manager, and three other individuals with widely ranging backgrounds. The other counselors have been selected by the general consensus of Parami employees.

(b) by submitting feedback in the company suggestion box.

The Compliance officer and Head of HR can offer a more structured and formal venue for recourse. Should the employee, or claimant, feel uncomfortable speaking with the legal officer or representative of HR, the group of selected counselors provides an alternative channel for identifying, reporting, and resolving disputes. The four different counselors, with very different backgrounds and positions, have been selected in the hope that employees can feel at ease with at least one of these counselors. These counselors help bridge the gap so that there is a more comfortable venue for expressing grievances.

Employees may choose to consult with one or more of any of these counselors. For the reporting process, there must be two (2) counselors present to sign off on the file when an employee logs his/her grievance. This is to verify that the employee made the complaint and that the counselor logged the complaint correctly.

No matter the channel, all details will be logged in a secure data base and all the information will be kept in strict confidentiality.

The process will be conducted in a timely manner.

In the event of a grievance the employee or a claimant, should be guided by the following steps: The claimant will consult with one or more of any of the Counselors, i.e. (1) the Compliance Officer, and/or (2) the Head of HR, and/or (3) any of the four of the selected counselors.

All of these persons are reachable by email and the meeting may be scheduled out of the office for privacy reasons.

- (a) The complaint/concern will be logged in an excel file on a secure database by the counselors. This database is only accessible by the counselors.
- (b) All complaints will be catalogued and categorized.
- (c) The employee can choose to follow one of three actions:
 - (i) only reporting,
 - (ii) informal resolution, or
 - (iii) formal resolution.
- (d) In the event that the employee has reported an incident of corruption, bribery, harassment or assault, or the like, a formal resolution must take place, and the process will be governed by the Parami Anti-Corruption Policy.
- (e) Every two months the group of Counselors will go over the log to look for trends and similarities in the registered concerns. This is a way to try to identify the root of many grievances and to see broader patterns of discontent throughout the group of companies that may provide guidance for needed policy changes.

Resolution Phase

The procedure for each claimant resolution option is defined below.

- (1) Only Report and Choose not to take the case any further.** The concern will be logged into the database which is only accessible by the counselors, Compliance Officer, and Head of HR. All of these Counselors have been instructed to maintain confidentiality.

- (a) At a later date and should the problem persist, the claimant may choose to take an informal or formal resolution.

However, in the event that the employee has logged an instance of corruption, bribery, assault or any other similar type of negative activity, a formal resolution must take place. It is not possible to choose an Informal Resolution or to choose to not take the case any further. At this point the situation must be handled under the **Parami Anti-Corruption Policy**.

- (2) **Choose an Informal Resolution.** After consultation and discussion, the counselors will help the claimant decide on the appropriate way to handle and resolve the issue.
 - (a) Many times, workplace issues may be resolved with a quiet conversation and apology. In such an instance there is no need to involve other members who are not affected.
 - (b) It is permissible to bring the concern to the attention of the appropriate member of senior management so that an employee with authority may help resolve the issue.
- (3) **Choose a Formal Resolution.** After consultation and discussion, the matter will be brought to the attention of all of the Counselors. They will then conduct an investigation.
 - (a) The company management empowers the Compliance/Legal Officer and Head of HR in the Company to investigate risk profiles especially to those who have or had suffered grievances with regard to matters concerning their human rights, treatment in the workforce, and other concerns.
 - (b) After investigation and detailed reporting, the situation will be made known to senior management for consultation. This includes a discussion with the relevant head of department, and/or CEO or COO.
 - (c) If it is an issue that is related to the CEO or COO, then the matter will be brought to the attention of the board of advisors.
 - (d) If the problem is with the board of advisors, then it will be reported to the CEO or COO.
 - (e) In all cases, the relevant higher level of management will be asked to assist.
 - (f) The process will be discreet so as to ensure the employee will not be at a disadvantage. (Refer also to the Parami Whistle-blower Policy).

All choices of action require room for flexibility, patience and understanding, given the varying nature of workplace issues and varying persons who may be involved. Either of the resolution pathways can be adapted to the particular needs of the claimant, as well as protecting the rights and reputation of any others involved, and as advised by the counselors.

The Grievance Channels:

- (1) Parami's selected counselors are:
 - (a) U Zaw Win, Head of Drilling Business Unit. He may be reached at zwin@parami.biz
 - (b) Daw Kyaw Kyaw Win, Head of Petroleum Processing Business Unit. She may be reached at kkw@parami.biz
 - (c) U Khing Maung Oo. He may be reached at kmo@parami.biz (HR Manager stand-in)
 - (d) U Myint Win, legal & mwin@parami.biz (Legal)
 - (e) Aung Myat Moe, Parami Event Manager. He may be reached at event@parami.biz

(2) Parami's suggestion box is at the entrance of the Parami Energy office on the 14th floor of Sak:ura Towers.

Revised By: Marga McElroy, January 2018

SECTION 4

GRIEVANCE and REDRESS POLICY

and

PROCEDURES