

# Responses from 2013 and 2014 oil and gas block winners on their ultimate beneficial ownership

## Company responses to Global Witness' survey of beneficial ownership

### Survey methodology

In February 2014, Global Witness sent information requests to each of the companies that were awarded onshore blocks in October 2013, or which were involved in the bidding for offshore blocks. Requests were sent by email, fax or post using contact information published by the Myanmar Ministry of Energy, or to company head offices. Due to the difficulties in reaching some companies in Myanmar, letters were subsequently hand delivered to the Yangon offices of these companies in March and April 2014. Global Witness has also met with companies engaged in the EITI process, and discussed the requests for information with them directly. Global Witness has not verified the responses provided by companies.

### 16 July 2014 update

The results of Global Witness' beneficial ownership survey were released on 26 June 2014. A range of companies that had not previously responded to our questions have subsequently provided us with information about their ownership. As of 16 July 2014, Global Witness had received additional responses from Myanmar's Parami Energy Development Co. Ltd, Australia's Woodside Energy (Myanmar) Pte Ltd, Italy's Eni SpA and Norway's Statoil. Global Witness has also received further direct responses from beneficial owners of Canadian Foresight Group. The UK's Siren E&P Ltd, which was not listed in the Ministry of Energy's original award announcement, has informed Global Witness that it has a stake in two onshore blocks, and it has provided us with full ownership information. This document has been updated fully to reflect these company responses.

### Summary of company responses

#### Key:

- Full response
- Partial response
- No response

**Note:** Where companies have not responded but their parent companies are understood to be either publicly listed or state owned, this has been noted in the table below.

Block	Ownership information provided by winning international companies	Ownership information provided by Myanmar partner
<b>Onshore blocks awarded in October 2013</b>		
PSC B-2	<i>ONGC Videsh Limited [India]: Full response provided. Wholly owned subsidiary of Oil and Natural Gas Corporation Limited, which is listed on the Bombay Stock Exchange and</i>	<i>Machinery &amp; Solutions Co. Ltd: Full response provided, with details of two individuals who own and control the company.</i>

	<i>the National Stock Exchange of India, and is under the administrative control of the Government of India's Ministry of Natural Petroleum &amp; Natural Gas.</i>	
PSC C-1	<i>Pacific Hunt Energy Corp [Canada]: No response.</i>	<i>Young Investment Group: No response.</i>
EP-1	<i>Brunei National Petroleum Company [Brunei]: Full response provided. The company, which is also known as PetroleumBRUNEI is wholly owned by the Government of Brunei Darussalam by way of the Ministry of Finance Corporation. This Corporation is a statutory body enacted under the Ministry of Finance (Incorporation) Order 2011.</i>	<i>IGE Pte. Ltd: No response.</i>
EP-3	<i>ONGC Videsh Limited [India]: Full response provided. Wholly owned subsidiary of Oil and Natural Gas Corporation Limited, which is listed on the Bombay Stock Exchange and the National Stock Exchange of India, and is under the administrative control of the Government of India's Ministry of Natural Petroleum &amp; Natural Gas.</i>	<i>Machinery &amp; Solutions Co. Ltd: Full response provided, with details of two individuals who own and control the company.</i>
EP-4	<i>JSOC Bashneft [Russia]: No response. [Note: JSOC Bashneft is a publicly listed company.]</i>	<i>UNOG Pte. Ltd: No response.</i>
H	<i>Pacific Hunt Energy Corp [Canada]: No response.</i>	<i>Young Investment Group: No response.</i>
IOR-4	<i>MPRL E&amp;P Pte. Ltd [British Virgin Islands]: Partial response provided, with details of immediate shareholders and directors, but not ultimate beneficial owners.</i>	<i>Myanmar Petroleum E&amp;P Co., Ltd. (MPEP): Full response provided, with details of individuals who own and control the company.</i>
IOR-5	<i>PETRONAS Carigali Myanmar Inc. [Malaysia]: Full response provided, stating company is wholly owned subsidiary of Petroleum Nasional Berhad (PETRONAS). According to the PETRONAS group's annual reports, PETRONAS is wholly owned by the Malaysian government.</i>	<i>UNOG Pte. Ltd: No response.</i>
IOR-6	<i>MPRL E&amp;P Pte. Ltd [British Virgin Islands]: Partial response provided, with details of immediate shareholders and directors, but not ultimate beneficial owners.</i>	<i>Myanmar Petroleum E&amp;P Co., Ltd. (MPEP): Full response provided, with details of individuals who own and control the company.</i>
IOR-7	<i>PETRONAS Carigali Myanmar Inc. [Malaysia]: Full response provided, stating that the company is a wholly owned subsidiary of Petroleum Nasional Berhad (PETRONAS). According to the PETRONAS group's annual reports, PETRONAS is wholly owned by the Malaysian government.</i>	<i>UNOG Pte. Ltd: No response.</i>

PSC-J	Siren E&P Ltd <sup>1</sup> [UK]: <i>Full response provided, stating that the company is privately owned, and setting out details of seven beneficial owners.</i>	Parami Energy Development Co. Ltd: <i>Full response provided, with details of individuals who own and control the company.</i>
	Petroleum Exploration (Pvt) Ltd [Pakistan]: <i>No response.</i>	
PSC-K	Eni Myanmar B.V.[Italy]: <i>Full response provided; wholly owned by publicly listed company.</i>	Myanmar Petroleum E&P Co., Ltd. (MPEP): <i>Full response provided, with details of individuals who own and control the company.</i>
MOGE-4	CAOG s.a.r.l. [Luxembourg]: <i>No response.</i>	Apex Geo Services Co. Ltd: <i>No response.</i>
MOGE-3	PTTEP South Asia Ltd [Thailand]: <i>No response.</i> [Note: PTTEP is a publicly listed company.] Palang Sophon Offshore [Thailand]: <i>No response.</i>	Win Precious Resources Pte. Ltd: <i>Company responded to say it is participating in the EITI committee. However, no information on its ownership has been provided.</i>
PSC-O	Siren E&P Ltd <sup>2</sup> [UK]: <i>Full response provided, stating the company is privately owned, and setting out details of the seven beneficial owners.</i>	Parami Energy Development Co. Ltd: <i>Full response provided, with details of individuals who own and control the company.</i>
	Petroleum Exploration (PVT) Ltd [Pakistan]: <i>No response.</i>	Precious Stone Mining Co. Ltd: <i>No response.</i>
RSF-5	Eni Myanmar B.V.[Italy]: <i>Full response provided; wholly owned by publicly listed company.</i>	Myanmar Petroleum E&P Co., Ltd. (MPEP): <i>Full response provided, with details of individuals who own and control the company.</i>
<b>Offshore shallow water blocks awarded in March 2014</b>		
A-4	BG Asia Pacific Pte Ltd [UK]: <i>Full response provided; wholly owned by publicly listed company.</i>	Myanmar Petroleum E&P Co., Ltd. (MPEP): <i>Full response provided, with details of individuals who own and control the company.</i>
	Woodside Energy (Myanmar) Pte Ltd [Australia]: <i>Full response; wholly owned by publicly listed company.</i>	
A-5	Chevron (Unocal Myanmar Offshore Co. Ltd) [US]: <i>No response.</i> [Note: Chevron is a publicly listed company.]	Royal Marine Engineering Co., Ltd: <i>No response.</i>
A-7	Woodside Energy (Myanmar) Pte Ltd [Australia]: <i>Full response; wholly owned by publicly listed company.</i>	Myanmar Petroleum E&P Co., Ltd. (MPEP): <i>Full response provided, with details of individuals who own and control the company.</i>
	BG Asia Pacific Pte Ltd [UK]: <i>Full response provided; wholly owned by publicly listed</i>	

<sup>1</sup> The Myanmar Ministry of Energy's award announcement stated that the international investor in blocks O and J was Pakistan Exploration (Pvt) Ltd (PEL). Siren E&P Ltd (Siren) has stated to Global Witness that these blocks were in fact awarded to a British-Pakistan joint venture, with Siren as the British co-venturer and PEL as the Pakistani co-venturer.

<sup>2</sup> Ibid.

	<i>company.</i>	
M-4	<p>Oil India Limited [India]: <i>No response.</i>  <i>[Note: Oil India is a state-owned company.]</i></p> <p>Mercator Petroleum Limited [India]: <i>No response.</i>  <i>[Note: Mercator is a publicly listed company.]</i></p> <p>Oilmax Energy Pvt Ltd [India]: <i>No response.</i></p>	Oil Star Management Services Co., Ltd: <i>No response.</i>
M-7	<p>ROC Oil Company Limited [Australia]: <i>Full response provided; wholly owned by publicly listed company.</i></p> <p>Tap Oil Ltd [Australia]: <i>No response.</i>  <i>[Note: Tap Oil is a publicly listed company.]</i></p>	Smart E&P International Co., Ltd: <i>No response.</i>
M-8	Berlanga Holding BV [Netherlands]: <i>No response.</i>	A-1 Mining Co., Ltd: <i>No response.</i>
M-15	<p>Transcontinental Group (TRG) [Australia] <i>Partial response provided stating that it is an Australian regulated private company, owned by the family of managing director, Simon Trevisan, who are Australian citizens. Response states that no owners are politically exposed persons.</i></p> <p>Canadian Foresight Group Ltd. [Canada]: <i>Partial response provided stating that no owners are politically exposed persons. Company has contacted shareholders with a request for beneficial owners to disclose their details directly to Global Witness. As of 16 July 2014, four beneficial owners have supplied information for the review.</i></p>	Century Bright Gold Co., Ltd, subsidiary of KMA Group. <sup>3</sup> <i>No response.</i>
M-17	Reliance Industries Ltd [India]: <i>No response.</i> <i>[Note: Reliance Industries is a publicly listed company.]</i>	United National Resources Development Services Co., Ltd: <i>No response.</i>
M-18	Reliance Industries Ltd [India]: <i>No response.</i> <i>[Note: Reliance Industries is a publicly listed company.]</i>	United National Resources Development Services Co., Ltd: <i>No response.</i>
YEB	<p>Oil India Limited [India]: <i>No response.</i>  <i>[Note: Oil India is a state-owned company.]</i></p> <p>Mercator Petroleum Limited [India]: <i>No response.</i></p> <p><i>[Note: Mercator is a publicly listed company.]</i></p>	Oil Star Management Services Co., Ltd: <i>No response.</i>

<sup>3</sup> The Myanmar Ministry of Energy announcement referred to Lin Win Co., Ltd as the Myanmar partner for block M-15. However, Canadian Foresight Group Ltd. has stated to Global Witness that the local partner is, in fact, Century Bright Gold Co., Ltd, a subsidiary of the KMA Group.

	Oilmax Energy Pvt Ltd [India]: <i>No response.</i>	
<b>Offshore blocks awarded in March 2014</b>		
AD-2	<p>BG Exploration and Production Myanmar Limited [UK]: <i>Full response provided; wholly owned by a publicly listed company.</i></p> <p>Woodside Energy (Myanmar) Pte Ltd [Australia]: <i>Full response; wholly owned by publicly listed company.</i></p>	Myanmar Petroleum E&P Co., Ltd. (MPEP): <i>Full response provided, with details of individuals who own and control the company.</i>
AD-3	Ophir Energy Plc [UK]: <i>No response.</i> <i>[Note: Ophir is a publicly listed company.]</i>	Parami Energy Development Co. Ltd: <i>Full response provided, with details of individuals who own and control the company.</i>
AD-5	<p>Woodside Energy (Myanmar) Pte Ltd [Australia]: <i>Full response; wholly owned by publicly listed company.</i></p> <p>BG Asia Pacific Pte Ltd [UK]: <i>Full response provided; wholly owned by publicly listed company.</i></p>	Myanmar Petroleum E&P Co., Ltd. (MPEP): <i>Full response provided, with details of individuals who own and control the company.</i>
AD-9	<p>Shell Myanmar Energy (Pte) Ltd [Anglo-Dutch]: <i>No response.</i> <i>[Note: Shell is a publicly listed company.]</i></p> <p>Mitsui Oil Exploration Co Ltd (MOECO) [Japan]: <i>Full response provided. MOECO is 79.97% owned by nine companies, each of which is either publicly listed or ultimately owned by a publicly listed company. The remaining 20.03% of the company is held by the Ministry of Economy, Trade and Industry of Japan.</i></p>	No local partner.
AD-10	<p>Statoil [Norway]: <i>Full response provided; wholly owned by publicly listed company.</i></p> <p>ConocoPhillips Myanmar E&amp;P Pte. Ltd [US]: <i>Full response provided stating that company is wholly owned by a publicly listed company.</i></p>	No local partner.
AD-11	<p>Shell Myanmar Energy (Pte) Ltd [Anglo-Dutch]: <i>No response.</i> <i>[Note: Shell is a publicly listed company.]</i></p> <p>Mitsui Oil Exploration Co Ltd (MOECO) [Japan]: <i>Full response provided. MOECO is 79.97% owned by nine companies each of which is either publicly listed or ultimately owned by a publicly listed company. The remaining 20.03% of the company is held by the Ministry of Economy, Trade and Industry</i></p>	No local partner.

	<i>of Japan.</i>	
MD-2	<i>Eni Myanmar B.V.[Italy]: Full response provided; wholly owned by publicly listed company.</i>	
	<i>Petrovietnam Exploration Production Corporation Ltd [Vietnam]: No response. [Note: Petrovietnam is a state owned company.]</i>	No local partner.
MD-4	<i>Eni Myanmar B.V.[Italy]: Full response provided; wholly owned by publicly listed company.</i>	
	<i>Petrovietnam Exploration Production Corporation Ltd [Vietnam]: No response. [Note: Petrovietnam is a state-owned company.]</i>	No local partner.
MD-5	<i>Shell Myanmar Energy (Pte) Ltd [Anglo-Dutch]: No response. [Note: Shell is a publicly listed company.]</i>	
	<i>Mitsui Oil Exploration Co Ltd (MOECO) [Japan]: Full response provided. MOECO is 79.97% owned by nine companies each of which is either publicly listed or ultimately owned by a publicly listed company. The remaining 20.03% of the company is held by the Ministry of Economy, Trade and Industry of Japan.</i>	No local partner.
YWB	<i>Total E&amp;P Activités Pétrolières [France]: Full response provided, stating that it is wholly owned by the publicly listed Total SA.</i>	No local partner.

### Detailed company responses

Full details of the responses from the 13 companies which chose to respond to Global Witness' request for information are set out below, in alphabetical order.

#### (1) **BG Asia Pacific Pte Limited:**

Response stating that all BG's interests in blocks A-4, A-7, AD-2 and AD-5 will be held by a wholly owned subsidiary of BG Group plc, a FTSE-listed company.

The company has also provided the following additional information and comments:

'Details of the principles and activities of BG Group can be found at: <http://www.bg-group.com/16/sustainability/>.

BG Group strongly supports Myanmar's commitment to manage its energy sector transparently and in line with international best practice. We have held several meetings with consultants in the Myanmar Development Resource Institute to seek ways to assist the country's candidacy for membership of the Extractive Industries Transparency Initiative. BG Group recently addressed an UNCAC conference in Nay Pyi Taw on the importance of effective anti-corruption policy in the

natural resources sector. We also support the work of the Myanmar Centre for Responsible Business.’

**(2) Brunei National Petroleum Company:**

Response stating that Brunei National Petroleum Company, also known as PetroleumBRUNEI, is a national oil company wholly owned by the Government of Brunei Darussalam by way of the Ministry of Finance Corporation. The said Corporation is a statutory body enacted under the Minister of Finance (Incorporation) Order 2011. Further information on PetroleumBRUNEI can be found on the company website [www.pb.com.bn](http://www.pb.com.bn).

**(3) Canadian Foresight Group Ltd.:**

Response stating that:

‘ . . . Canadian Foresight Group Ltd. (the “**Company**”) is a Canadian controlled, Alberta incorporated private company. The Company is not listed on any exchange and is in the large part directly held by the beneficial shareholders of the company, most of whom are private citizens resident in Alberta, Canada. . . .

With respect to the requested details of the company’s beneficial shareholders, Alberta and applicable Canadian federal privacy legislation, including the *Personal Information and Privacy Act* (Alberta) and the *Personal Information and Protection and Electronic Documents Act* (Canada), prevent an organization such as the Company, from disclosing such details without obtaining the prior consent of the shareholder. We do not have this consent and as such not be able to provide a shareholder list.

However, we are able to confirm that, to the Company’s knowledge after due inquiry, none of the beneficial owners of the Company are ‘politically exposed persons’ as set forth in [Global Witness’] letter.

Additionally, we can confirm that each of the directors and officers of the Corporation, all of whom are Canadian citizens, are also shareholders. We are happy to provide the following identifying and contract details:

<b>Kevin Flaherty</b>	Executive Director and Director A603 City Garden Apartments, 59 Ngo Tat To, Binh Thanh, HCMC, Vietnam
<b>Songning Shen</b>	President and Director 1020, 903-8 Avenue S.W., Calgary, AB, Canada T2P 0P7
<b>Gregory G. Turnbull</b>	Director Suite 4000, 421 – 7 <sup>th</sup> Avenue S.W., Calgary, AB, Canada T2P 4K9
<b>Raymond S. Fong</b>	Director 1020, 903 – 8 Avenue, S.W., Calgary, AB, Canada T2P 0P7
<b>Perla Woo</b>	Treasurer 1020, 903 – 8 Avenue, S.W., Calgary, AB, Canada T2P 0P7

**Rick Pawluk**

Corporate Secretary  
Suite 4000, 421 – 7<sup>th</sup> Avenue S.W., Calgary, AB, Canada T2P 4K9

Since providing this response, Canadian Foresight Group Ltd. has agreed to **contact each of its shareholders directly with a request for disclosure of their identities**. Any further information provided to Global Witness in respect of the identities of Canadian Foresight Group Ltd.'s beneficial owners will be published on this page.

As of 16 July 2014, four of Canadian Foresight's beneficial owners had provided their information to Global Witness:

*Beneficial owner 1:*

- *Full name:* Kevin Flaherty.
- *Date of birth and/or national identity number:* Not supplied.
- *Nationality:* Canadian.
- *Country of residence:* Vietnam.
- *Status:* Beneficial owner of all Canadian Foresight shares held in his name on a 100% basis.
- *Number and percentage of shares held in Canadian Foresight:* Twenty two million shares representing 15.12% of the issued and outstanding shares of Canadian Foresight.
- *Percentage of shares held in Canadian Foresight with direct or indirect voting rights:* 15.12% with direct voting rights. No indirect rights held or controlled.

*Note: Global Witness had also requested a date of birth and/or national identity number for identification purposes. This beneficial owner declined to provide this information on the basis of concerns over identity theft.*

*Beneficial owner 2:*

- *Full name:* Minglin Li.
- *Date of birth and/or national identity number:* Date of birth provided to Global Witness. Available upon request.
- *Nationality:* Canadian.
- *Country of residence:* Calgary, Alberta, Canada.
- *Number and percentage of shares held in Canadian Foresight:* 100,000 shares.
- *Percentage of shares held in Canadian Foresight with direct or indirect voting rights:* 100,000 shares.
- *Additional details if the beneficial owner is a politically exposed person:* N/A.

*Beneficial owner 3:*

- *Full name:* Li Zhang
- *Date of birth and/or national identity number:* Date of birth provided to Global Witness. Available upon request.
- *Nationality:* Canadian
- *Country of residence:* Canada
- *Number and percentage of shares held in Canadian Foresight:* 2 million shares, 1.4%
- *Percentage of shares held in Canadian Foresight with direct or indirect voting rights:* 1.4% direct voting rights.

*Beneficial owner 4:*

- *Full name:* Rui Yang
- *Date of birth and/or national identity number:* Date of birth provided to Global Witness. Available upon request.
- *Nationality:* Canadian
- *Country of residence:* Canada
- *Number and percentage of shares held in Canadian Foresight:* 2.5 million shares, 1.7%
- *Percentage of shares held in Canadian Foresight with direct or indirect voting rights:* 1.7% direct voting rights.

In addition, Canadian Foresight Group Ltd. has also provided the following comments and information on its engagement in Myanmar:

'We . . . look forward to working with the government of Myanmar, [Global Witness] and other like-minded organizations in the development of Myanmar's natural resource sector in accordance with best international practice in a transparent, corruption free, locally engaged and environmentally aware manner.

. . . While the Company has been awarded the right to negotiate the terms of a production sharing contract with the Government of Myanmar and Myanma Oil and Gas Enterprise with respect to Block M-15, the production sharing contract is yet to be signed and the negotiation process is ongoing.

With respect to the issue of corruption, we would like to emphasize the fact that as a Canadian firm and as Canadian citizens we are subject to the provisions of Canada's *Corruption of Foreign Public Officials Act*. In addition, the Joint Bidding Agreement between the Company and its partners contains the following warranty:

**WARRANTIES AS TO NO PAYMENTS, GIFTS AND LOANS**

- (a) Each Party warrants that it, its Affiliates and employees have not made, offered, or authorized and will not make, offer or authorize with respect to the matters which are the subject of this Agreement, any payment, gift, promise or other advantage, whether directly or through any other person or entity, to or for the use or benefit of any public official (i.e., any person holding a legislative, administrative or judicial office, including any person employed by or acting for a public agency, a public enterprise or a public international organization) or any political party or political party official or candidate for office, where payment, gift, promise or advantage would violate (i) the applicable laws of Myanmar; (ii) the laws of the country of incorporation of that Party or that Party's ultimate parent company and of the principal place of the business of the ultimate parent company; and (iii) the principles described in the *Convention on Combating Bribery of Foreign Public Officials in International Business Transactions*, signed in Paris on December, 17, 1997, which entered into force on February 15, 1999, and the Convention's Commentaries. Each Party shall defend, indemnify and hold the other Party harmless from and against all claims, damages, losses, penalties, costs and expenses arising from or related to, any breach by the first Party of that Warranty. The indemnity obligation shall survive termination or expiration of this Agreement.'

Following on from this response, Canadian Foresight has submitted requests for information directly to each of its shareholders. Global Witness will update this site with any additional details provided on the beneficial owners of Canadian Foresight.

**(4) ConocoPhillips Myanmar E&P Pte. Ltd.:**

Response stating that ConocoPhillips Myanmar E&P Pte. Ltd. participated in Myanmar's offshore bid round by submitting two joint bids with Statoil AS. ConocoPhillips Myanmar E&P Pte. Ltd. is a wholly owned subsidiary of ConocoPhillips, a publicly listed company on the New York Stock Exchange.

**(5) Eni Myanmar B.V.:**

Response stating that Eni SpA participated in the Myanmar onshore and offshore bidding rounds launched by the Ministry of Energy of Myanmar in 2013, through Eni Myanmar B.V., a wholly owned subsidiary of Eni International B.V. (100% owned affiliate of Eni). In October 2013, Eni Myanmar B.V. was awarded the onshore licenses RSF-5 and RSC-K. In March 2014, Eni Myanmar B.V. was chosen as selected candidate for the award of the deepwater offshore licenses MD-2 and MD-4. Eni SpA is a publicly listed company trading on the Italian and New York Stock Exchanges.

Response also notes that in terms of organisational transparency, Eni discloses the list of its subsidiaries in the company's annual report. Thanks to this, Eni was attributed the highest score in the organisational transparency section of the 'Transparency in Corporate Reporting' study, released by Transparency International in 2012.

**(6) Machinery & Solutions:**

- Response stating that the company has two ultimate beneficial owners:
  - Mr Aung Ye Soe (Managing Director)
    - Date of birth: Date of birth provided to Global Witness. Available upon request.
    - Nationality: Myanmar
    - Country of residence: Myanmar
  - Dr Htay Htay (Director)
    - Date of birth: Date of birth provided to Global Witness. Available upon request.
    - Nationality: Myanmar
    - Country of residence: Myanmar
- Contact details for Mr Aung Ye Soe and Dr Htay Htay:
  - Address: No. 146 (L-2) Shwe Hnin Si Street, Mayangone Township, Yangon, Myanmar.
  - Telephone numbers: +95 1 667 110; +95 1 966 9562; +95 1 966 9563.
  - Facsimile number: +95 1 667 110.
  - Email: [info@mandsenergyservices.com](mailto:info@mandsenergyservices.com).
- Statement that no politically exposed person owns any share in Machinery & Solutions. [For the purposes of this survey, a politically exposed person was defined to mean a senior politician in Myanmar or the close family or associates of a senior politician].

**(7) Mitsui Oil Exploration Co. Ltd (MOECO):**

Response providing a full breakdown of the full ownership of Mitsui Oil Exploration Co. Ltd as follows:

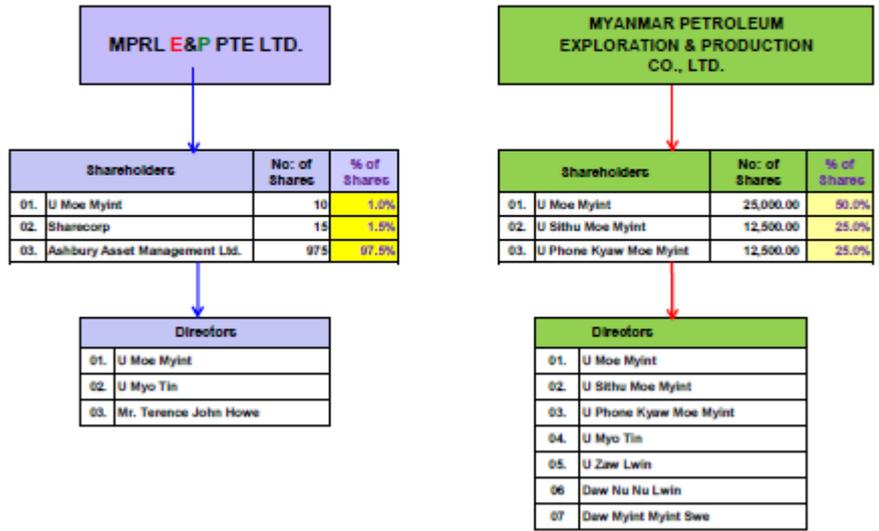
<b>Name of shareholder</b>	<b>Investment ratio (%)</b>	<b>Shareholder details</b>
Mitsui & Co., Ltd.	73.58%	A publicly listed company.
Ministry of Economy, Trade and Industry of Japan	20.03%	A government department.
Nippon Steel & Sumikin Engineering Co., Ltd.	1.53%	Nippon Steel & Sumikin Engineering Co., Ltd is a wholly-owned subsidiary of parent company, Nippon Steel & Sumitomo Metal, which is a publicly listed company.
JX Nippon Oil & Gas Exploration Corporation	1.45%	JX Nippon Oil & Gas Exploration Corporation is a wholly-owned subsidiary of a parent company, JX holdings, which is a publicly listed company.
INPEX CORPORATION	0.92%	A publicly listed company.
KYOKUTO PETROLEUM INDUSTRIES, LTD.	0.85%	Kyokuto Petroleum Industries, Ltd is owned by EMG Marketing and MOC Marketing. EMG Marketing is owned by Tonen General Petroleum Ltd and Exxon Mobil which are publicly listed companies. MOC Marketing is owned by Tonen General Petroleum Ltd, Sumitomo Mitsui Banking Corporation, Sumitomo Mitsui Trust Bank and Mitsui Life Insurance Company Ltd which are publicly listed companies.
The Japan Steel Works, Ltd.	0.69%	A publicly listed company.
SHOWA SHELL SEKIYU K.K.	0.42%	A publicly listed company.
Toagosei Co., Ltd.	0.30%	A publicly listed company.
JGC Corporation	0.23%	A publicly listed company.

**(8) MPRL E&P Pte Ltd:**

Response from company stating that:

- MPRL is a privately owned company and as such is not publicly listed.
- None of the shareholders or directors of MPRL are politically exposed in Myanmar or are related to any senior politicians in Myanmar.
- All personnel listed can be contacted via the MPRL E&P office. Contact details for the office and website are as follows:
  - o Address: MPRL E&P Pte Ltd, 84-85, Hlaing Myint Moh Lane #1, 10<sup>th</sup> Quarter, Hlaing Township, Yangon, Myanmar.
  - o Telephone number: (95-1) 521 471 ~ 3, 521 461 ~ 2.
  - o Facsimile number: (95-1) 521 156.
- The breakdown of both MPRL and associated company MPEP is as follows:

## Structure of Shares Holders & Directors



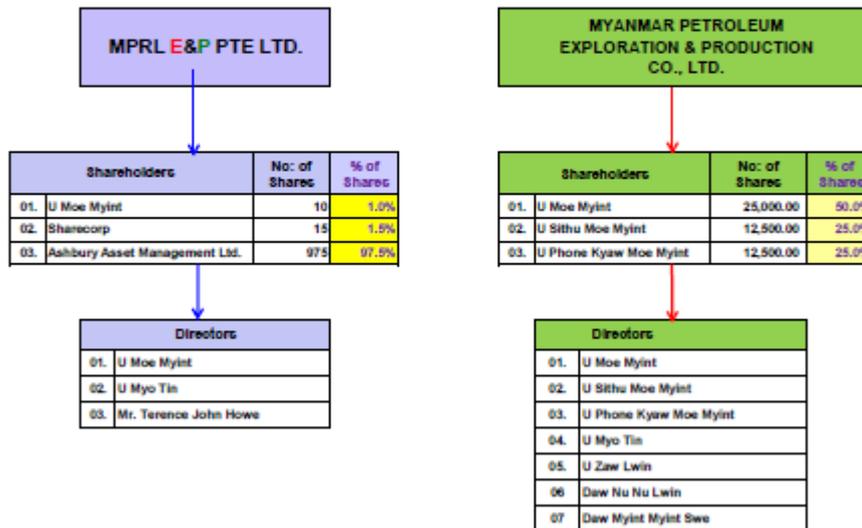
- The company is planning to go public in the near future.

### (9) Myanmar Petroleum E&P Co., Ltd. (MPEP):

Response from company stating that:

- MPEP is a privately owned company and as such is not publicly listed.
- None of the shareholders or directors of MPEP are politically exposed in Myanmar or are related to any senior politicians in Myanmar.
- All personnel listed can be contacted via the MPRL E&P office. Contact details for the office and website are as follows:
  - o *Address:* MPRL E&P Pte Ltd, 84-85, Hlaing Myint Moh Lane #1, 10<sup>th</sup> Quarter, Hlaing Township, Yangon, Myanmar.
  - o *Telephone number:* (95-1) 521 471 ~ 3, 521 461 ~ 2.
  - o *Facsimile number:* (95-1) 521 156.
- The breakdown of both MPEP and associated company MPRL is as follows:

## Structure of Shares Holders & Directors



- The individuals named as shareholders of MPEP in the above breakdown fully control their ownership stakes (i.e. none of these shareholders act on the instruction of or as a proxy for any other person in relation to their MPEP shares).

### (10) PETRONAS Carigali Myanmar Inc:

Response from PETRONAS Carigali Sdn Bhd stating that its interests in Myanmar are held by PETRONAS, which is its wholly owned subsidiary and is not listed.

Further information on PETRONAS Carigali Myanmar Inc. can be obtained from the Annual Report which is available at <http://www.petronas.my/investor-relations/Pages/default.aspx>.

In the annual reports, Petroliaam Nasional Berhad (PETRONAS) is stated to be wholly owned by the Malaysian Government.

### (11) ONGC Videsh Limited:

Response stating that ONGC Videsh Ltd. is a wholly owned subsidiary and overseas arm of Oil and Natural Gas Corporation Limited (ONGC) which is the flagship national oil company of India. ONGC is a Central Public Sector Enterprise (CPSE) under the administrative control of the Ministry of Petroleum & Natural Gas, Government of India. ONGC is also listed with the Bombay Stock Exchange and National Stock Exchange of India.

### (12) Parami Energy Development Co. Ltd:

Response stating that Parami Energy Development Co. Ltd is part of the Parami Energy Group of Companies, and that there is no politically exposed person in the company. [For the purposes of this survey, a politically exposed person was defined to mean a senior politician in Myanmar or the close family or associates of a senior politician].

Currently, the 13 companies of the Parami Group are a family-run business. The vast majority of the shares are held by two of those shareholders: Pyi Wa Tun (Ken Tun) and his father Than Tun. Myint Nay Chi Tun is Ken Tun's sister and Ei Ei Khet is his wife. There are no political connections or affiliations within the owners of Parami. The exact share ownership structure is as follows:

<b>Subsidiary</b>	<b>Pyi Wa Tun (Ken Tun)</b>	<b>Than Tun</b>	<b>Myint Nay Chi Tun</b>	<b>Ei Ei Khet</b>
Parami Energy Development	60%	40%	--	--
Parami Energy Trading (no activity)	50%	50%	--	--
Parami Energy Pipeline	40%	60%	--	--
Mandalay Petroleum Services	98%	--	2%	--
PT & MM Travels & Tours	96%	4%	--	--
PT & MM Event Ads	96%	4%	--	--
Mandalay Petroleum Development	99%	1%	--	--
Royal Yemon Investment	50%	--	--	50%
Mandalay Aviation Services	99%	1%	--	--
Pillar of Truth Insurance	60%	40%	--	--
Parami Energy Services	50%	50%	--	--
Parami Energy Pte	100%	--	--	--
Parami Pte	100%	--	--	--

Pyi Wa Tun or Ken Tun is also CEO and Chairman of the Parami Group, which is currently an informal association of these 13 companies.

With respect to the two named beneficial owners of Parami Energy Development, the following identifying details have been supplied:

*Beneficial owner 1:*

- *Full name:* Pyi Wa Tun (Ken Tun)
- *Date of birth and/or national identity number:* Date of birth provided to Global Witness. Available upon request.
- *Nationality:* Burmese; Singapore PR
- *Country of residence:* Yangon, Myanmar

*Beneficial owner 2:*

- *Full name:* Than Tun
- *Date of birth and/or national identity number:* Date of birth and identification number provided to Global Witness. Available upon request.
- *Nationality:* Burmese
- *Country of residence:* Yangon, Myanmar

*Company address:* #14-02, #15-07 Sule Pagoda Road, Yangon Myanmar  
Tel: (951) 255104, 255106, 255450

In addition, Parami Energy Group's transparency policy is available at <http://parami.com/wp-content/uploads/2014/05/Organizational-Transparency-Policy-for-Parami-Energy-Group-of->

[Companies110414.pdf](#). This policy is dated 1 April 2014 and provides details of company structure, ownership and control.

Parami Energy Group is reviewing its Due Diligence process and is in the process of preparing audited accounts (by internal auditors and KPMG), as well as an inaugural annual report that highlights full disclosure of the Group's business units, operations and accounting practices.

**(13) ROC Oil Company Limited:**

Response stating that Roc Oil Company Limited is a public company listed on the Australian Securities Exchange Limited.

**(14) Siren E&P Limited:**

Response stating that Siren E&P Ltd ('Siren') is a privately-owned upstream oil and gas company that is committed to good corporate citizenship and the implementation of industry best practice. Siren is led by an experienced team of executives, several of whom were previously senior management at Shell. Siren's senior top team has in excess of 150 man years of industry experience.

Myanmar Block O and Block J were awarded to a British-Pakistan joint venture, with Siren as the British co-venturer and Pakistan Exploration (Pvt) Ltd ('PEL') as the Pakistani co-venturer. (Shahzad International is the parent company of PEL). In order to enhance accounting and tax transparency, the following affiliates will implement the venture:

- For Block O: Petroleum Exploration (Myanmar Block O) Pte. Ltd.
- For Block J: Petroleum Exploration (Myanmar J) Pte. Ltd.

In the interest of transparency, information on these companies is publicly available in their place of registration, Singapore, a proper jurisdiction with appropriate international agreements with Myanmar providing for information exchange and tax transparency.

In each block the Myanmar government stipulates that at least one local partner participates. We have chosen Parami Energy Development Co. Ltd to participate in both Blocks O and J and Precious Stone Mining Co. Ltd to participate in Block O.

Siren will be responsible for health, safety and environmental compliance, and for environmental and social impact assessment, and has already expended significant efforts in respect of its commitments in these and other areas.

The beneficial owners of Siren with control are the following:

Name	Nationality	Key recent employment and roles
Board of Directors		
<i>Dr Neil Carmichael</i>	<i>UK</i>	<i>Shell: Country Chairman</i>
<i>James Varanese</i>	<i>US</i>	<i>Clyde &amp; Co.: Partner</i>
<i>Tim Linacre</i>	<i>UK</i>	<i>Panmure Gordon &amp; Co.: CEO</i>
<i>Shahzad Zaheer</i>	<i>Pakistan</i>	<i>Shahzad International Group: CFO</i>
<i>Dr Paul Featherstone</i>	<i>UK</i>	<i>Shell: Exploration Manager</i>
<i>Dr Larry Marks</i>	<i>Canada</i>	<i>Shell: Upstream Manager</i>
<i>Andrew Gifford</i>	<i>UK</i>	<i>Asset management, Family Office Association</i>

*Dates of birth for each of these individuals have been provided to Global Witness and are available upon request.*

None of the individuals involved in Siren is a politically exposed person.

**(15) Statoil:**

Response stating that the listed parent company is Statoil ASA. The deep-water exploration block AD-10 was awarded to Statoil and partner ConocoPhillips on 26 March 2014, each with a 50% equity share and with Statoil as the operator. There are no local partners involved and there are no obligations to have local partners involved in the deep-water blocks.

**(16) Total E&P Activités Pétrolières:**

Response stating it had participated in Myanmar's offshore round launched in 2013 through Total E&P Activités Pétrolières, a wholly-owned subsidiary of Total SA, the latter being a publicly listed company.

**(17) Transcontinental Group:**

Response stating that Transcontinental Group ('TRG') is an Australian owned and regulated private proprietary limited company and it is not a subsidiary of a public company. It is beneficially owned and controlled by the family of the managing director, Simon Trevisan, who are Australian citizens. No politically exposed persons (as defined in Global Witness' request for information) has any involvement with TRG.

Further details of beneficial ownership were not provided on the basis that it is private information protected by privacy laws in Australia and Europe.

In addition, TRG recognises the clear legal and ethical obligations to not participate in or co-operate with any forms of corrupt behaviour – which are captured in the Joint Bidding Agreement between TRG and its partners (see Canadian Foresight Group Ltd. response for text of this Joint Bidding Agreement).

**(18) Woodside Energy (Myanmar) Pte Ltd:**

Response stating that Woodside Energy (Myanmar) Pte Ltd is a wholly owned subsidiary of Woodside Energy Ltd which in turn is a wholly owned subsidiary of Woodside Petroleum Ltd which is listed on the Australian Stock Exchange. Details of this ownership structure are set out at page 132 of Woodside Petroleum Ltd's 2012 Annual Report for the year ended 31 December 2012 ([http://www.woodside.com.au/Investors-Media/Annual-Reports/Documents/2012%20Annual%20Report%20\(Interactive\).pdf](http://www.woodside.com.au/Investors-Media/Annual-Reports/Documents/2012%20Annual%20Report%20(Interactive).pdf)).