



global witness

The shell starts to crack?

Real owners of Myanmar's oil and gas blocks come forward

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Overview

Corrupt politicians all over the world use companies and trusts with hidden ownership to seize public property worth billions of dollars.¹ This deprives ordinary citizens of money that should be spent on development and empowers unaccountable elites, often helping them gain and maintain power at the expense of democracy, human rights and peace.

Revealing the real people behind companies is critical to achieving genuine reform in Myanmar, where military families and crony tycoons have long benefited from control of natural resources like gas and gemstones. This is a critical time—in July 2014, Myanmar became a candidate member of the Extractive Industries Transparency Initiative (EITI), a global transparency standard which recommends that the identities of individuals who own and control oil, gas and mining companies are published.² If Myanmar can meet the standard, it will go a long way to addressing the question of who really owns the companies that control the country's most valuable natural assets.

To test the waters, Global Witness asked each of the companies granted oil and gas blocks in Myanmar over the past 12 months to declare their ultimate beneficial ownership.³ These blocks were awarded in the wake of a public commitment by the Ministry of Energy to manage Myanmar's energy sector in line with international best practices,⁴ and alongside the engagement of leading energy companies in Myanmar's EITI process.⁵

As such, the willingness of block winners to open up their ownership is an important yardstick for progress on reform of Myanmar's extractive industries.

Key findings

- Over the past 12 months, Myanmar has awarded 36 oil and gas blocks to 46 international and local companies,⁶ with all but one block held by two or more companies in partnership. There are 17 blocks where all companies holding a stake have fully declared their ultimate ownership in responses to Global Witness. **This makes Myanmar the current global leader on company ownership publication**, setting an important precedent on which the government, legislators and the Myanmar EITI can build.
- For 26 blocks, international companies were required to partner with a Myanmar company. Of the 15 private Myanmar companies which won oil and gas block stakes, eight (i.e. just over half) have fully declared who ultimately owns and controls them. In addition, five private international companies chose to provide partial or full ownership information to Global Witness.
- The response rate improved dramatically after an earlier publication by Global Witness drew attention to the problem of opaque company ownership, and the reputational impacts for companies.⁷ The subsequent flood of declarations shows that private companies can and will declare their ultimate beneficial owners if they have the right incentive.
- A hard core of seven Myanmar companies and 11 international companies have not declared their ownership, showing that more work is needed to tackle this corruption risk.
- In a number of instances, company responses have suggested corrections or additions to the notices published by Myanmar's Ministry of Energy on which companies won which blocks. Some respondents told Global Witness that the published names of the winning companies were incorrect or incomplete. This illustrates the importance of making such details public so that they can be independently checked and any errors, inadvertent or deliberate, can be identified and scrutinised.

Recommendations

- All oil, gas and mining companies operating in Myanmar should publish details of the individuals who ultimately own and control them.
- Myanmar's EITI process should prioritise the disclosure of company ownership, and establish this as a standard for the extractive industries. Particular attention should be given to the ownership of companies that hold concessions in conflict-affected areas.
- Myanmar's government and parliament should build requirements for ultimate beneficial ownership disclosure into the new laws and regulations being developed for the oil, gas, mineral, and gemstone sectors. These laws should also protect the rights of citizens to raise concerns over corruption, conflicts of interests or companies' breaches of their obligations to local people.
- The Myanmar government and extractive industry companies engaged in the country should agree a standard for companies to display, substantiate and update ultimate beneficial ownership information.
- The World Bank, US, UK, Norway, Australia and other donors supporting extractives sector reform in Myanmar should vigorously promote beneficial ownership disclosure, through initiatives like the EITI and reforms to the country's legal framework.



Corruption and mismanagement have long deprived Myanmar's people of the benefits of their oil, gas and minerals. Publicly disclosing company ownership could help ensure these resources drive development for all, rather than lining the pockets of an elite few.

(Credit: Greenshoots Communications/Alamy).

1) Why does company ownership matter?

There is a growing recognition of the need for the ultimate beneficial ownership of companies to be opened up to public scrutiny. A World Bank review of major corruption cases in 80 countries between 1980 and 2010 revealed that over 70% involved the use of corporate vehicles to conceal beneficial ownership.⁸ From Slobodan Milosevic's use of thousands of Cypriot front companies to provide arms for the war against Bosnia and Kosovo, to the Italian mafia's use of shell companies to defraud the European Union out of money intended to regenerate Europe's poorest regions, there are countless examples of the harm hidden company ownership causes.⁹

Given the huge sums at play in the oil, gas and mining sectors, the risks of corruption are particularly acute. In Myanmar, a country famed for its natural resource riches, but where one in four citizens lives in extreme poverty,¹⁰ questions have long been raised over 'missing' revenues from natural gas, jade and other natural resources which do not appear to reach official government accounts.¹¹

Box 1: Anonymous companies and corruption

In 2008, the Zimbabwean army took control, on behalf of the **Zimbabwean government**, of the **Marange diamond fields** using troops and helicopter gunships, killing and wounding many small-scale miners in the process. Since then, government diamond concessions have been allocated to several companies in questionable circumstances. **Mbada Diamonds**, which is **partly controlled through companies registered in the British Virgin Islands and Mauritius**, is one such company. It is run by a man widely reported to be **Zimbabwean President Mugabe's former helicopter pilot**.¹²

The **ex-Prime Minister of Ukraine**, Pavel Lazarenko, was sent to jail in the United States in 2006 for **laundering tens of millions of dollars of money that rightfully belonged to the Ukrainian people**.¹³ He was partly able to do this by **using anonymous companies incorporated in Delaware and California**.¹⁴ One of the companies was used to funnel money into the United States to buy him a US\$7 million house in California.¹⁵

A mix of anonymous companies and secrecy in the oil sector led to hundreds of millions of dollars being diverted away from Nigeria's people and into the hands of a convicted money-lauderer. In 2012, Global Witness exposed how Nigerian subsidiaries of Royal Dutch Shell and Italian oil giant Eni agreed to pay US\$1.092 billion for one of Nigeria's most lucrative oil blocks, OPL245. The payment was made by Shell and Eni to the Nigerian government who had a separate agreement to pay the same amount to **Malabu Oil and Gas, a company widely believed at the time to be controlled by convicted money-lauderer and former oil minister Chief Dan Etete**.¹⁶ In 2013, a British High Court ruled that Etete was a hidden owner of Malabu.¹⁷ As Etete had awarded the block to Malabu whilst oil minister under the corrupt dictator Abacha, he had **effectively given himself one of the most lucrative oil blocks in Nigeria**.¹⁸ He was able to do this by **keeping his ownership of Malabu secret**.

The Myanmar government has publicly stated its commitment to reform and transparency of its extractive industries. Getting company ownership into the open is a crucial component of any such reform process. It allows local people to see who is getting access to their natural resources and puts them in the position to identify and raise concerns over conflicts of interest or irregularities.

Transparent company ownership also has important implications for achieving lasting peace in Myanmar. Many of the country's significant natural resource deposits are located in ethnic minority states and in some cases they have provided an incentive or a source of funding for conflicts between the Myanmar government and non-state armed groups. With regard to oil and gas, blocks A, B1/2, J, R, S, T, U and V are all sited in areas which are or have been affected by armed conflict.¹⁹ Bringing into the open the ownership of the companies that control these blocks is pivotal to building the trust needed to achieve peace.

This is reflected in the following message to Global Witness from one Myanmar civil society representative:

“ . . . please help us to get information related to the blocks in the conflict zones as they will be really important to support [the] peace process . . . decision makers need real information in order to make the right decision at the right time.”²⁰



All over the world, corrupt politicians and other criminals use anonymous companies to hide their identities.
(Credit: TED/Megan Jett)

2) What did we ask companies to disclose?

Global Witness contacted each of the winners of the 36 oil and gas blocks awarded by the Myanmar government in October 2013 and March 2014 to ask for details of their ultimate beneficial owners.

Box 2: What is an ‘ultimate beneficial owner’?

A company’s ultimate beneficial owners are the individuals (or single individual) who ultimately own or control the company, either directly or indirectly. This means the persons who control the actions of the company and/or who ultimately receive the profits. Significantly, a beneficial owner must be a real, live individual, and not another company or trust. For companies with complicated ownership structures, involving many different corporate vehicles and, in some cases, private agreements over ownership and/or control, the beneficial owners are the individuals who are right at the very top of the chain.²¹

We asked all privately owned companies with stakes in the blocks to give us the names of the real, live individuals who are right of the top of their ownership chains, and details of any owners with high-level political connections (see Box 3 below).

Many of the winning international companies are either listed on public stock exchanges or are state-owned so their ultimate ownership is already in the public domain. In those cases, we asked if the corporate vehicle used to hold the company's oil and gas block stake in Myanmar is a wholly owned subsidiary. Where the answer was no, we asked for the full details of the other entities which co-owned the corporate vehicle so as to ensure a complete picture of its ultimate ownership.

Box 3: Ownership information requested from private companies with stakes in Myanmar's recently awarded oil and gas blocks²²

- Name of each and every ultimate beneficial owner of the company.
- Name of any politically exposed person who owns a share in the company. For the purposes of this request, a politically exposed person was defined as a senior politician in Myanmar or a close family member or an associate of a senior politician.
- For all beneficial owners or politically exposed persons listed, additional identifying information (for example, dates of birth, nationality or country of residence), a means of contacting them and a description of how they exercise control over the company.

In all cases, we relied on the companies to provide us with details of their ownership, rather than going to public sources such as company websites, registries or stock exchange announcements for information. Companies know who their owners are, and the burden of proof should be on them to publish this information rather than for overstretched government officials to prise it out of them.

3) What did the companies say?

Initially, only a handful of companies chose to respond in full to Global Witness' requests for information about their ultimate beneficial ownership. In June 2014, we published survey results showing that, at that time, we had complete information on the ownership of only three of the 36 oil and gas blocks awarded.²³ Soon afterwards, however, a range of additional companies chose to declare their ultimate beneficial owners. This shows that businesses can and will provide such information if they have an incentive, such as protection of their reputation, to do so.

In total, 28 companies have now participated in Global Witness' ownership review, and we have been provided with full beneficial ownership details of all partners in 17 oil and gas blocks.

Crucially, ten private companies have supplied complete details of the individuals who own and control them. This includes eight of the Myanmar companies working with international partners: Apex Geo Services; Machinery & Solutions; Myanmar Petroleum Exploration and Production; Oil Star Management Services; Parami Energy Development; Royal Marine Engineering; Smart E&P International; and Win Precious Resources. We also received full responses from the UK's Siren E&P and Pakistan's Petroleum Exploration (PVT), whilst the British Virgin Islands' MPRL, Australia's Transcontinental Group and Canada's Canadian Foresight have provided partial responses.



As companies release information about their ultimate owners, Myanmar citizens get a first glimpse of who is really benefiting from their oil and gas reserves.
(Credit: TED/Megan Jett)

Fifteen publicly listed and state owned companies have also participated in the survey. The majority of these simply stated that they held their stakes in the oil or gas blocks through wholly owned subsidiaries. Japan's MOECO, however, holds 73.58% of its subsidiary, with the Japanese government holding another 20.03% and eight other companies holding the remaining 6.39%. MOECO has provided a complete breakdown of each of its co-owners, down to those with 0.23% and 0.30% stakes in the subsidiary, together with details of the ultimate ownership of each of these companies.

Responding companies also addressed the question of 'politically exposed persons'; that is, whether any of their beneficial owners held senior political positions, or were close family or associates of office holders. For the most part, the responses were a straightforward no, but the beneficial owner of Myanmar company Oil Star Management Services Co., Limited declared a previous position in the Ministry of Energy.

This level of participation and disclosure is positive, and sets an important precedent both within Myanmar and internationally. However, despite repeated requests for information, 18 companies have not provided any ownership information to Global Witness. This is particularly concerning when it comes to private companies such as Canada's Pacific Hunt, the Netherlands' CAOG s.a.r.l., India's Oilmax Energy Pvt Ltd, Thailand's Palang Sophon Offshore and Myanmar companies including IGE Pte. Limited, KMA Group and Young Investment Group. With no information available to the public on who really stands behind these companies, they pose a potentially serious corruption risk which needs to be addressed.

The map on page 8 shows the companies awarded oil and gas blocks in 2013 and 2014, and the shading indicates which of these have provided partial or full responses to Global Witness' information request. Where a block is half shaded, at least one partner did not provide any response to the survey.

A table of company responses is set out in the annex to this briefing, together with full details of the information provided by each company.

It should be noted that Global Witness has not verified the information provided but it is now in the public domain and therefore open to independent scrutiny.

Box 4: Company corrections to Ministry of Energy announcements

In October 2013, the Myanmar Ministry of Energy accompanied its announcement of the award of 16 onshore oil and gas blocks with a public list of the winning international companies (but not their Myanmar company partners).²⁴ In March 2014, the Ministry published the winners of 20 offshore shallow and deep water blocks, listing both the international winners and their Myanmar partners.²⁵

Whilst responding to Global Witness' request for ownership information, several companies have suggested the following corrections and additions to the information contained in these official Ministry announcements, specifically:

- The Myanmar partner for offshore block M-15 is not Lin Win Co. Ltd, but Century Bright Gold Co., Limited, a subsidiary of KMA Group.²⁶

- Contrary to the Ministry's March 2014 announcement, Myanmar Petroleum E&P Co. Ltd has no stake in offshore blocks AD-2 or AD-5. Both blocks are owned entirely by Australia's Woodside and the UK's BG.²⁷
- The Ministry's October 2013 announcement states that onshore blocks O and J were awarded to Pakistan's Petroleum Exploration (PVT) Limited (PEL). The UK's Siren E&P Limited has stated, however, that it is PEL's co-venturer for both blocks, and that the two companies are partnering with Myanmar companies Parami Energy Development Co. Ltd and Precious Stone Mining Co. Limited for Block O, and with Parami Energy Development Co. Ltd for Block J.²⁸

The Ministry of Energy's publication of the block winners was a welcome step forward in increasing transparency of Myanmar's oil and gas sector. The company names and contact details made available on the Ministry's public pages provided the starting point for Global Witness' ownership review. At the same time, the apparent errors which companies have flagged in the official announcements show how important it is that such information can be checked by members of the public – not to mention companies themselves – so that any inaccuracies, inadvertent or deliberate, can be identified and corrected.

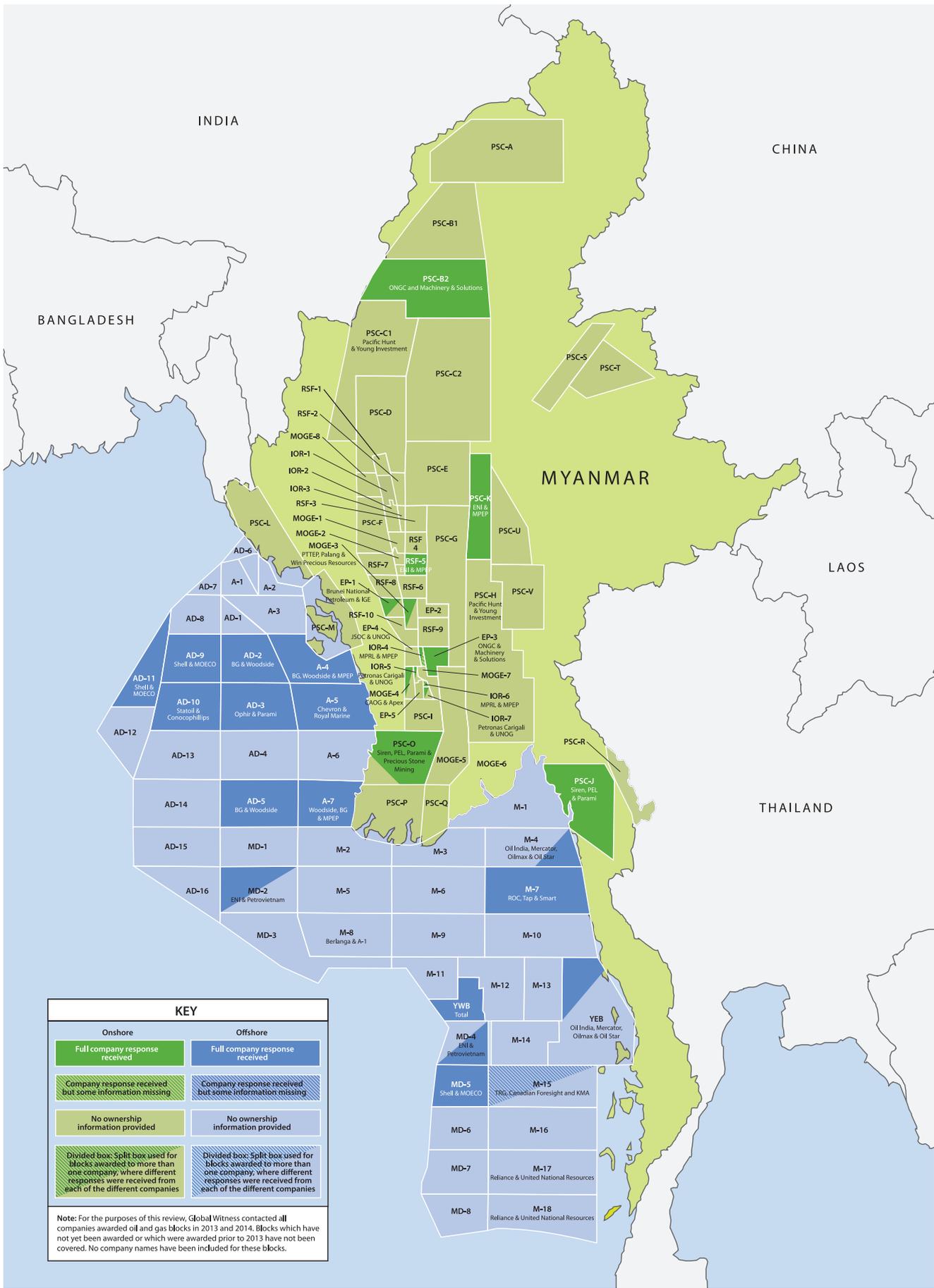
Global Witness has not made full enquiries into the purported inaccuracies in the Ministry of Energy announcements. It is not clear whether the announcements simply contained mistakes or whether changes were made after the award announcements. If the latter, then further enquiries may be necessary to check on the reasons for the changes and whether there has been any circumvention of the standard bidding process.

4) A global first

There is now growing momentum, globally, behind beneficial ownership disclosure. In 2013, the G8 announced that its members would require information on who really owns and profits from companies and trusts to be made available to tax collection and law enforcement authorities.²⁹ The UK has gone further by confirming that it will introduce legislation to establish a company ownership register,³⁰ and France has indicated that it will do the same.³¹ The European Parliament has also voted in favour of public registries of beneficial ownership.³² Through the EITI, 14 countries, including Honduras, the Kyrgyz Republic, Liberia, Tajikistan and Zambia, are currently undertaking extractive industry beneficial ownership pilots.³³

These initiatives are all in their early stages, however, and the declarations by Myanmar's oil and gas block winners are, in fact, setting an international precedent for systematic disclosure of ultimate beneficial ownership. The government and legislators, in particular, now have the opportunity to capitalise on this positive start, and establish Myanmar as a global leader on this critical dimension of the fight against corruption and its impacts on poor countries.

Map showing recent block winners and responses to Global Witness survey



Conclusion: a good start, but what now?

In July 2014, Myanmar became an EITI candidate country, and it will shortly be hosting the next international board meeting of the EITI. The government, company and civil society representatives overseeing EITI implementation in Myanmar have already stated their intention to map beneficial ownership in the country's extractive sectors. They have the opportunity now to build on the 28 company declarations provided to Global Witness, and to **undertake similar exercises in respect of other oil, gas and mining concessions**. Further work is also needed to **push the companies which have so far failed to provide ownership information to publish this data**.

At the same time, the Myanmar government and parliament is in the process of revising the laws and regulations which govern the oil, gas, mineral and gemstone industries. It is also continuing to award new extractive concessions and to negotiate with companies on concession contracts which will set the terms for exploration and exploitation activities for years to come. **These laws, regulations and contracts should all build in requirements for beneficial ownership disclosure, so that this becomes a standard requirement within Myanmar's legal framework.**



By putting an end to hidden company ownership and secret deals, President Thein Sein's government can help steer Myanmar towards the peace and prosperity citizens deserve. (Credit: Martin Sojka. For photographic licence see <http://bit.ly/1xHut8x#>)

In order that citizens can use the information disclosed through beneficial ownership declarations to hold officials and companies to account for any conflicts of interest or irregularities, it is also important that they are able to raise questions or concerns without fear of legal, physical or political retribution. **Disclosure requirements therefore need to be complemented by greater protections for freedom of expression.**

A host of donors including the World Bank, the US, the UK, Norway and Australia are all funding reforms to Myanmar's oil, gas and mining industries. By providing political and technical support, they can help to

ensure that the momentum behind beneficial ownership disclosure is maintained. As an immediate step, donors should consider financing **the creation of an online platform to display and maintain company ownership declarations in Myanmar and ethnic languages**, so that Myanmar's citizens have easy access to up-to-date information on business ventures that affect them.

More broadly, it is important that attention is also given to other transparency measures needed for good management of the extractive industries, notably the publication of contracts. One month after becoming an EITI candidate, Myanmar signed contracts for the onshore oil and gas blocks awarded in October 2013, but the final terms of these agreements have not been published.

This is a worrying development, not least because contract transparency is one of the issues that Myanmar's EITI scheme is intended to cover. Keeping citizens in the dark over the financial terms on which major national assets are being sold off creates an avenue for corruption and public dissatisfaction. Moreover, in a country, where public concerns over the impacts of extractive industry projects have already led to widespread protests,³⁴ it is crucial that citizens can, from the outset, see what social and environmental protections have been agreed, so that they can check their adequacy and monitor their implementation.

The government should move quickly to address this setback by **putting the terms of these onshore block contracts in the public domain**. It should **take the same best practice approach to the forthcoming contracts on offshore blocks** which are currently under negotiation.

Annex: 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 oil and gas 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 Myanmar's 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. The results of all responses received as of 26 June 2014 were published on that date.

In August and September 2014, Global Witness contacted each of the companies which had not provided a response to invite them again to disclose their ownership. Letters were hand delivered to each of the Myanmar companies, and the international companies were contacted by email, fax or post. Calls were also made to each of the companies which had not responded to encourage them to submit information.

Summary of company responses

Key:

	Full response	<i>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.</i>
	Partial response	
	No response	

Block	Ownership information provided by winning international companies	Ownership information provided by Myanmar partner
Onshore blocks awarded in October 2013		
PSC B-2	ONGC Videsh Limited [India]: <i>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 & Natural Gas.</i>	Machinery & Solutions Co. Limited: <i>Full response provided, with details of individuals who own and control the company.</i>
PSC C-1	Pacific Hunt Energy Corp [Canada]: <i>No response.</i>	Young Investment Group: <i>No response.</i>
EP-1	Brunei National Petroleum Company [Brunei]: <i>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>	IGE Pte. Limited: <i>No response.</i>

EP-3	ONGC Videsh Limited [India]: <i>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 & Natural Gas.</i>	Machinery & Solutions Co. Limited: <i>Full response provided, with details of individuals who own and control the company.</i>
EP-4	JSOC Bashneft [Russia]: <i>No response. [Note: JSOC Bashneft is a publicly listed company.]</i>	UNOG Pte. Limited: <i>No response.</i>
H	Pacific Hunt Energy Corp [Canada]: <i>No response.</i>	Young Investment Group: <i>No response.</i>
IOR-4	MPRL E&P Pte. Limited [British Virgin Islands]: <i>Partial response provided, with details of immediate shareholders and directors, but not ultimate beneficial owners.</i>	Myanmar Petroleum E&P Co., Limited. (MPEP): <i>Full response provided, with details of individuals who own and control the company.</i>
IOR-5	PETRONAS Carigali Myanmar Inc. [Malaysia]: <i>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>	UNOG Pte. Limited: <i>No response.</i>
IOR-6	MPRL E&P Pte. Ltd [British Virgin Islands]: <i>Partial response provided, with details of immediate shareholders and directors, but not ultimate beneficial owners.</i>	Myanmar Petroleum E&P Co., Limited. (MPEP): <i>Full response provided, with details of individuals who own and control the company.</i>
IOR-7	PETRONAS Carigali Myanmar Inc. [Malaysia]: <i>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>	UNOG Pte. Limited: <i>No response.</i>
PSC-J	Siren E&P Limited ¹ [UK]: <i>Full response provided, with details of individuals who own and control the company.</i>	Parami Energy Development Co. Limited: <i>Full response provided, with details of individuals who own and control the company.</i>
	Petroleum Exploration (PVT) Limited [Pakistan]: <i>Full response provided, with details of individuals who own and control the company.</i>	
PSC-K	Eni Myanmar B.V.[Italy]: <i>Full response provided; wholly owned by publicly listed company.</i>	Myanmar Petroleum E&P Co., Limited (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 Company Limited: <i>Full response provided, with details of individuals who own and control the company.</i>

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

MOGE-3	PTTEP South Asia Limited [Thailand]: <i>No response.</i> <i>[Note: PTTEP is a publicly listed company.]</i>	Win Precious Resources Pte. Limited: <i>Full response provided, with details of the individual who owns and controls the company.</i>
	Palang Sophon Offshore [Thailand]: <i>No response.</i>	
PSC-0	Siren E&P Limited ² [UK]: <i>Full response provided, with details of individuals who own and control the company.</i>	Parami Energy Development Co. Limited: <i>Full response provided, with details of individuals who own and control the company.</i>
	Petroleum Exploration (PVT) Limited [Pakistan]: <i>Full response provided, with details of individuals who own and control the company.</i>	Precious Stone Mining Co. Limited: <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., Limited (MPEP): <i>Full response provided, with details of individuals who own and control the company.</i>
Offshore shallow water blocks awarded in March 2014		
A-4	BG Asia Pacific Pte Limited [UK]: <i>Full response provided; wholly owned by publicly listed company.</i>	Myanmar Petroleum E&P Co., Limited. (MPEP): <i>Full response provided, with details of individuals who own and control the company.</i>
	Woodside Energy (Myanmar) Pte Limited [Australia]: <i>Full response; wholly owned by publicly listed company.</i>	
A-5	Chevron (Unocal Myanmar Offshore Co. Limited) [US]: <i>Full response; wholly owned by publicly listed company.</i>	Royal Marine Engineering Co., Limited: <i>Full response provided, with details of individuals who own and control the company.</i>
A-7	Woodside Energy (Myanmar) Pte Limited [Australia]: <i>Full response; wholly owned by publicly listed company.</i>	Myanmar Petroleum E&P Co., Limited. (MPEP): <i>Full response provided, with details of individuals who own and control the company.</i>
	BG Asia Pacific Pte Limited [UK]: <i>Full response provided; wholly owned by publicly listed company.</i>	
M-4	Oil India Limited [India]: <i>No response.</i> <i>[Note: Oil India is a state-owned company.]</i>	Oil Star Management Services Co., Limited: <i>Full response provided, with details of individuals who own and control the company.</i>
	Mercator Petroleum Limited [India]: <i>No response.</i> <i>[Note: Mercator is a publicly listed company.]</i>	
	Oilmax Energy Pvt Limited [India]: <i>No response.</i>	
M-7	ROC Oil Company Limited [Australia]: <i>Full response provided; wholly owned by publicly listed company.</i>	Smart E&P International Co., Limited: <i>Full response provided, with details of individuals who own and control the company.</i>
	Tap Oil Limited [Australia]: <i>Full response provided; wholly owned by publicly listed company.</i>	
M-8	Berlanga Holding BV [Netherlands]: <i>No response.</i>	A-1 Mining Co., Limited: <i>No response.</i>

M-15	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>	Century Bright Gold Co., Limited, subsidiary of KMA Group. ³ <i>No response.</i>
	Canadian Foresight Group Limited [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 1 October 2014, four beneficial owners have supplied identifying information for the review.</i>	
M-17	Reliance Industries Limited [India]: <i>No response. [Note: Reliance Industries is a publicly listed company.]</i>	United National Resources Development Services Co., Limited: <i>No response.</i>
M-18	Reliance Industries Limited [India]: <i>No response. [Note: Reliance Industries is a publicly listed company.]</i>	United National Resources Development Services Co., Limited: <i>No response.</i>
YEB	Oil India Limited [India]: <i>No response. [Note: Oil India is a state-owned company.]</i>	Oil Star Management Services Co., Limited: <i>Full response provided, with details of individuals who own and control the company.</i>
	Mercator Petroleum Limited [India]: <i>No response. [Note: Mercator is a publicly listed company.]</i>	
	Oilmax Energy Pvt Limited [India]: <i>No response.</i>	
Offshore blocks awarded in March 2014		
AD-2	BG Exploration and Production Myanmar Limited [UK]: <i>Full response provided; wholly owned by a publicly listed company.</i>	No local partner. ⁴
	Woodside Energy (Myanmar) Pte Limited [Australia]: <i>Full response; wholly owned by publicly listed company.</i>	
AD-3	Ophir Energy Plc [UK]: <i>Full response provided stating that Ophir is a publicly listed company on the London Stock Exchange.</i>	Parami Energy Development Co. Limited: <i>Full response provided, with details of individuals who own and control the company.</i>
AD-5	Woodside Energy (Myanmar) Pte Limited [Australia]: <i>Full response; wholly owned by publicly listed company.</i>	No local partner. ⁵
	BG Asia Pacific Pte Ltd [UK]: <i>Full response provided; wholly owned by publicly listed company.</i>	

3. The Myanmar Ministry of Energy announcement referred to Lin Win Co., Limited as the Myanmar partner for block M-15. However, Canadian Foresight Group Limited has stated to Global Witness that the local partner is, in fact, Century Bright Gold Co., Limited, a subsidiary of KMA Group.
4. The Myanmar Ministry of Energy's announcement of the offshore block winners stated that Myanmar Petroleum E&P Co., Limited has been selected as the local company winner of blocks AD-2 and AD-5. However, Woodside Energy (Myanmar) Pte. Limited has stated to Global Witness that there is no local company partner for either of these blocks.
5. *Ibid.*

AD-9	Shell Myanmar Energy (Pte) Limited [Anglo-Dutch]: <i>Full response provided; wholly owned by publicly listed company.</i>	No local partner
	Mitsui Oil Exploration Co Limited (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>	
AD-10	Statoil [Norway]: <i>Full response provided; wholly owned by publicly listed company.</i>	No local partner
	ConocoPhillips Myanmar E&P Pte. Limited [US]: <i>Full response provided; wholly owned by a publicly listed company.</i>	
AD-11	Shell Myanmar Energy (Pte) Limited [Anglo-Dutch]: <i>Full response provided; wholly owned by a publicly listed company.</i>	No local partner
	Mitsui Oil Exploration Co Limited (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>	
MD-2	Eni Myanmar B.V.[Italy]: <i>Full response provided; wholly owned by publicly listed company.</i>	No local partner
	Petrovietnam Exploration Production Corporation Limited [Vietnam]: <i>No response. [Note: Petrovietnam is a state owned company.]</i>	
MD-4	Eni Myanmar B.V.[Italy]: <i>Full response provided; wholly owned by publicly listed company.</i>	No local partner
	Petrovietnam Exploration Production Corporation Limited [Vietnam]: <i>No response. [Note: Petrovietnam is a state-owned company.]</i>	
MD-5	Shell Myanmar Energy (Pte) Limited [Anglo-Dutch]: <i>Full response provided; wholly owned by publicly listed company.</i>	No local partner
	Mitsui Oil Exploration Co Limited (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>	
YWB	Total E&P Activités Pétrolières [France]: <i>Full response provided; wholly owned by publicly listed company.</i>	No local partner

Full company responses⁶

Full details of the responses from the 28 companies which chose to respond to Global Witness' request for information are set out below, in alphabetical order.⁷

(1) Apex Geo Services Company Limited:

Response stating that Apex Geo Service Company is a private limited company registered at the Directorate of Investment and Company Administration, and that it has two ultimate beneficial owners as follows:

Beneficial owner 1:

- *Name:* U Min Mg Mg
- *Position:* Managing Director
- *Date of birth:* Provided to Global Witness
- *Nationality:* Myanmar
- *Country of residence:* Myanmar

Beneficial owner 2:

- *Name:* Daw Ohn Mar Nyo
- *Position:* Director
- *Date of birth:* Provided to Global Witness
- *Nationality:* Myanmar
- *Country of residence:* Myanmar

The response further stated that these two beneficial owners own and control 100% of Apex Geo Services Company. The company has 50 shares in total, and each person holds 25 shares. They each fully own and control their ownership stakes in the company. On the question of whether either beneficial owner is a politically exposed person (defined as a senior politician in Myanmar or the close family or associates of a senior politician), the response was that they were 'not involving with Political Group' (sic).

The company's beneficial owners can be contacted through the following business address:

No.8(A), Kha Paung Street (Martin Avenue), 6 Miles, Hlaing Township, Yangon, Myanmar
Tel/Fax: (951) 504610, 536559

(2) BG Asia Pacific Pte Limited and BG Exploration and Production Myanmar 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:

6. Full details of the request for information which Global Witness submitted to the companies from February 2014 are available at www.globalwitness.org/myanmaroilandgas.

7. Where dates of birth or national identity numbers have been provided to Global Witness, this has been stated below. To address concerns over risks of identity theft, we are not publishing this information at this time, but we will use it to assist with any attempts to identify particular individuals which are directed to Global Witness.

'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.'

(3) 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.

(4) Canadian Foresight Group Limited:

Response stating that:

'...Canadian Foresight Group Limited (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:

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

Perla Woo Treasurer
1020, 903 – 8 Avenue, S.W., Calgary, AB, Canada T2P 0P7

Rick Pawluk Corporate Secretary
Suite 4000, 421 – 7th Avenue S.W., Calgary, AB, Canada T2P 4K9

After provided this response, Canadian Foresight Group Limited agreed to contact each of its shareholders directly with Global Witness' request for disclosure of their identities.

As of 1 October 2014, four of Canadian Foresight's beneficial owners had provided identifying 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:* Provided to Global Witness
- *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 (Percentage share not provided)
- *Additional details if the beneficial owner is a politically exposed person:* N/A

Beneficial owner 3:

- *Full name:* Li Zhang
- *Date of birth:* Provided to Global Witness
- *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.
- *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 Limited 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 on-going.

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.'

(5) Chevron (Unocal Myanmar Offshore Co. Limited)

Response stating that Unocal Myanmar Offshore Co., Limited., which has a 28.3 percent non-operated working interest in a PSC for the production of natural gas from the Yadana and Sein fields within blocks M5 and M6 in the Andaman Sea and was selected as the provisional operator of Block A5, is a wholly owned subsidiary of Chevron corporation. Further details are available at: www.chevron.com/documents/pdf/chevron2013annualreportsupplement.pdf.

(6) ConocoPhillips Myanmar E&P Pte. Limited:

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

(7) 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 PSC-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 organizational 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.

(8) Machinery & Solutions:

Response stating that the company has two ultimate beneficial owners:

Beneficial owner 1:

- *Full name:* Mr Aung Ye Soe (Managing Director)
- *Date of birth:* Provided to Global Witness
- *Nationality:* Myanmar
- *Country of residence:* Myanmar

Beneficial owner 2:

- *Full name:* Dr Htay Htay (Director)
- *Date of birth:* Provided to Global Witness
- *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.

The company response also stated 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.]

(9) Mitsui Oil Exploration Co. Limited (MOECO):

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

Name of shareholder	Investment ratio (%)	Shareholder details
Mitsui & Co., Limited	73.58%	A publicly listed company.
Ministry of Economy, Trade and Industry of Japan	20.03%	A government department.
Nippon Steel & Sumikin Engineering Co., Limited	1.53%	Nippon Steel & Sumikin Engineering Co., Limited 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, LIMITED	0.85%	Kyokuto Petroleum Industries, Limited is owned by EMG Marketing and MOC Marketing. EMG Marketing is owned by Tonen General Petroleum Limited and Exxon Mobil which are publicly listed companies. MOC Marketing is owned by Tonen General Petroleum Limited, Sumitomo Mitsui Banking Corporation, Sumitomo Mitsui Trust Bank and Mitsui Life Insurance Company Limited which are publicly listed companies.
The Japan Steel Works, Limited	0.69%	A publicly listed company.
SHOWA SHELL SEKIYU K.K.	0.42%	A publicly listed company.
Toagosei Co., Limited	0.30%	A publicly listed company.
JGC Corporation	0.23%	A publicly listed company.

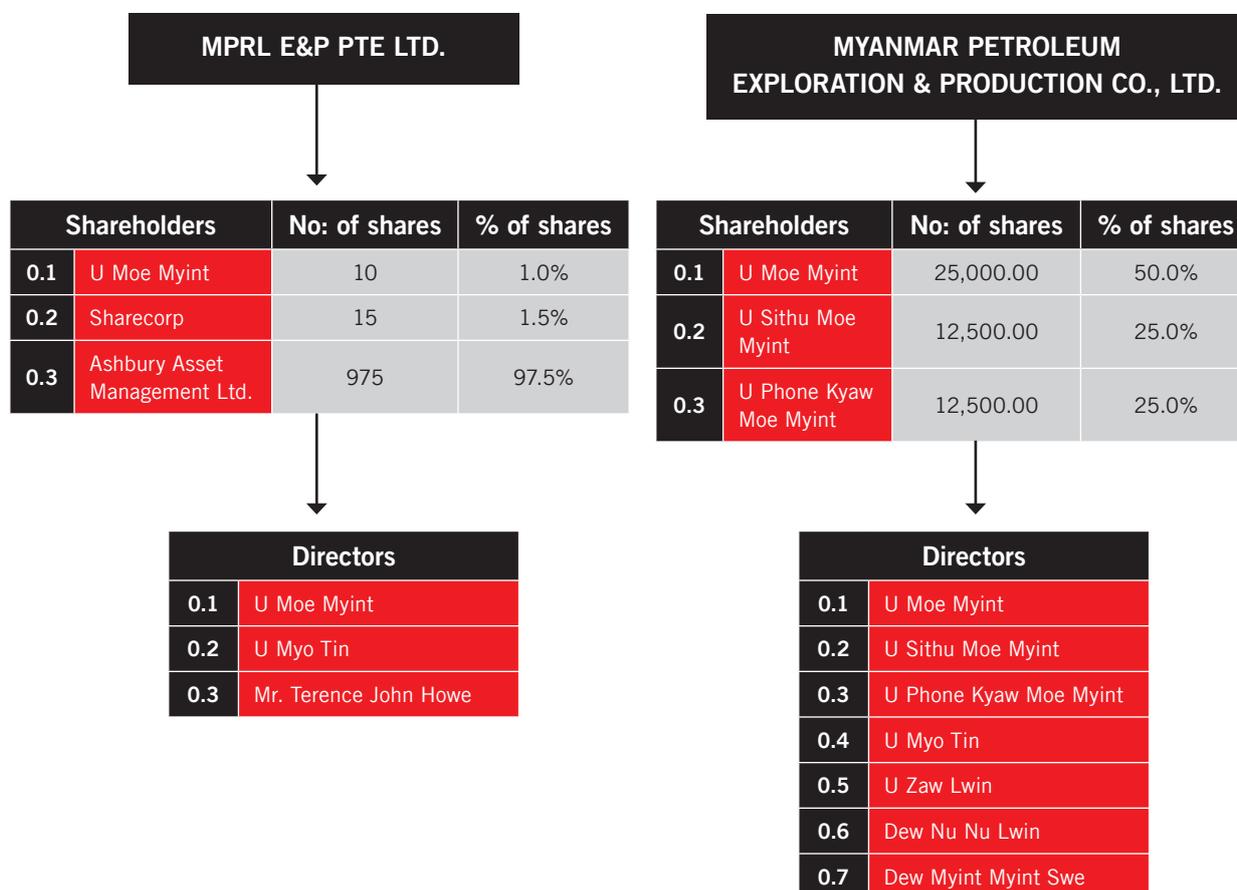
(10) MPRL E&P Pte Limited:

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:
 - *Address:* MPRL E&P Pte Limited, 84-85, Hlaing Myint Moh Lane #1, 10th Quarter, Hlaing Township, Yangon, Myanmar.
 - *Telephone number:* (95-1) 521 471 ~ 3, 521 461 ~ 2.
 - *Facsimile number:* (95-1) 521 156.
- The company is planning to go public in the near future.

The breakdown of both MPRL and associated company MPEP is as follows:

Structure of Shareholders and Directors



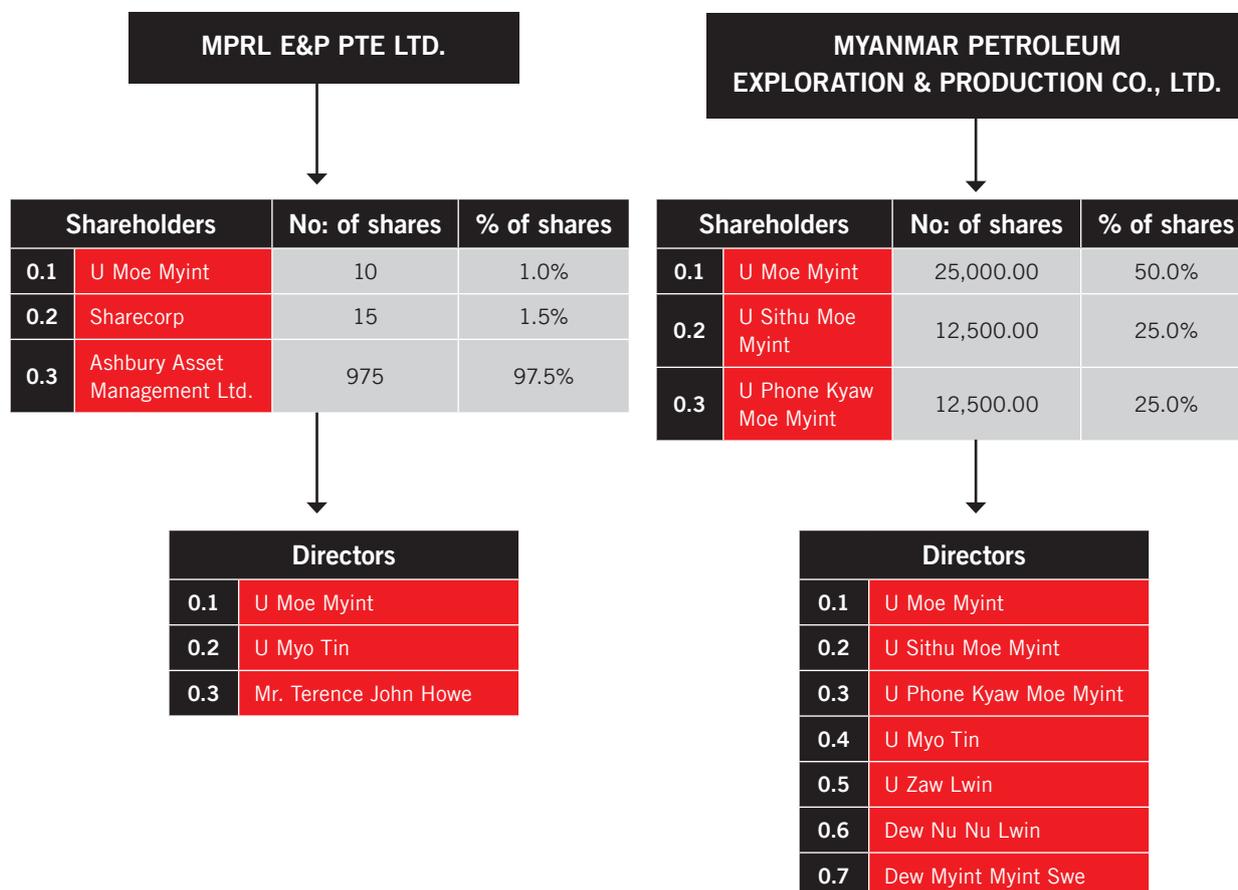
(11) Myanmar Petroleum E&P Co., Limited (MPEP):

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:
 - Address: MPRL E&P Pte Limited, 84-85, Hlaing Myint Moh Lane #1, 10th Quarter, Hlaing Township, Yangon, Myanmar.
 - Telephone number: (95-1) 521 471 ~ 3, 521 461 ~ 2.
 - Facsimile number: (95-1) 521 156.

The breakdown of both MPEP and associated company MPRL is as follows:

Structure of Shareholders and 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).

(12) Oil Star Management Services Company Limited:

Response stating that Oil Star Management Services Company Limited is a private local company which was registered in Naypyitaw on 28 December 2012, and also registered with the Myanmar Oil and Gas Enterprise as a local partner company for the 2013 and 2014 offshore and onshore bidding rounds.

The following details of the company's ultimate beneficial owners have been supplied:

Beneficial owner 1:

Name: U Kyaw Hlaing

Position: Managing Director

Date of birth: Provided to Global Witness

Nationality: Myanmar

Country of residence: Myanmar

Ownership and control: Owns 10% of the company, but directly controls the company's affairs as the second beneficial owner is currently in the UK.

Beneficial owner 2:

Name: U Hlaing Min (Jeffrey)

Position: Director

Nationality: Myanmar

Country of residence: UK

Ownership and control: Owns 90% of the company. However, the company is controlled by U Kyaw Hlaing, through an informal arrangement.

Response further stated that U Kyaw Hlaing is a retired Director of Exploration in Myanmar Oil and Gas Enterprise, Ministry of Energy, Myanmar, and the father of U Hlaing Min. Neither U Kyaw Hlaing nor U Hlaing Min are close family or associates of any military generals.

In addition, the response stated that U Hlaing Min is a private taxi owner and driver in London. U Kyaw Hlaing has 39 years of experience in the oil and gas industry.

The beneficial owners can be contacted through the company's business address:

No.101, SH-2 Condo, Eiksietan Housing, Wayzantar Road, Thingangyun Township, Yangon

(13) ONGC Videsh Limited:

Response stating that ONGC Videsh Limited 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.

(14) Ophir Energy Limited:

Response stating that Ophir is a publicly listed company on the London Stock Exchange.

(15) Parami Energy Development Co. Limited:

Response stating that Parami Energy Development Co. Limited 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:

Subsidiary	Pyi Wa Tun (Ken Tun)	Than Tun	Myint Nay Chi Tun	Ei Ei Khet
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.
- *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.
- *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 has also stated that it 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'.

(16) Petroleum Exploration (PVT) Limited:

Response stating that Petroleum Exploration (PVT) Limited ('PEL') is a private sector oil and gas exploration and production company of Pakistan, incorporated in June 1994.

PEL's beneficial owners are:

Name	Nationality	Designation	Country of Residence	Date of birth
Mr. Zaheeruddin	Pakistani	Chairman & Chief Executive	Pakistan	Provided to Global Witness
Mr. Zafar Iqbal	Pakistani	Director	Pakistan	Provided to Global Witness
Mr. Moeenuddin	Pakistani	Director	Pakistan	Provided to Global Witness
Mr. Shahzad Zaheer	Pakistani	Director	Pakistan	Provided to Global Witness

These four owners hold between them 100% of the company. They each fully own their own stakes in the company but Mr Zaheeruddin who is the Chairman and Chief Executive has final decision making power.

Means of contact:

Business address: House 20, Main Margalla Road, F-8/3, Islamabad, Pakistan 44000.
Tel: 0092 51 2287251-2 Fax: 0092 51 2287154-4

Detailed information on the company can be found by visiting PEL's website:

<http://www.shahzadintl.com.pk> and

<http://www.shahzadintl.com.pk/companies/PEL/#/home>

(17) 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, Petroliam Nasional Berhad (PETRONAS) is stated to be wholly owned by the Malaysian Government.

(18) ROC Oil Company Limited:

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

(19) Royal Marine Engineering Co., Limited:

Response stating that Royal Marine Engineering Co., Limited (RME) is not a publicly listed or a wholly owned subsidiary of a publicly listed company. RME is a 100% family owned company.

No politically exposed persons own shares in the company.

RME's beneficial owners are as follows:

Beneficial owner 1:

- *Full name:* Myint Aung (Mr.), Managing Director
- *Date of birth:* Provided to Global Witness
- *Nationality:* Myanmar
- *Country of residence:* Myanmar

Beneficial owner 2:

- *Full name:* Ce Ce Htwe (Ms.), Director
- *Date of birth:* Provided to Global Witness
- *Nationality:* Myanmar
- *Country of residence:* Myanmar

Between them U Myint Aung and Daw Ce Ce Htwe hold 100% of the company. They fully own and control their stakes in RME.

Contact address for both beneficial owners:

No.22, 2nd floor, Shwe Pone Nyet Yeik Mon, Bayint Naung Road, Kamayut Township, Yangon
Tel: 951-505665, 530830 Fax: 951-530830 Email: office@royalmarinegroup.com
Web: www.royalmarinegroup.com

(20) Shell Myanmar Energy Pte Limited:

Response stating that Shell Myanmar Energy Pte Limited is a wholly owned subsidiary of Royal Dutch Shell plc. Royal Dutch Shell plc is a publicly listed company.

Further stating that 'Shell operates globally in accordance with the Shell General Business Principles in which we commit to honesty, integrity and fairness in all aspects of our business and expect the same in our relationships with all those with whom we do business. We support international efforts to combat corruption by belonging to initiatives such as the World Economic Forum's Partnership against Corruption Initiative (PACI) and Transparency International's Business Principles on Combating Bribery (2002). We are also one of the founding members and a board member of the Extractive industries Transparency Initiative (EITI). Furthermore, Shell is also a member of Global Compact and we report in line with its principles.'

(21) Siren E&P Limited:

Response stating that Siren E&P Limited ('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) Limited ('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. Limited
- For Block J: Petroleum Exploration (Myanmar J) Pte. Limited

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. Limited to participate in both Blocks O and J and Precious Stone Mining Co. Limited 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 response also that 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>	UK	Shell: Country Chairman
<i>James Varanese</i>	US	Clyde & Co.: Partner
<i>Tim Linacre</i>	UK	Panmure Gordon & Co.: CEO
<i>Shahzad Zaheer</i>	Pakistan	Shahzad International Group: CFO
<i>Dr Paul Featherstone</i>	UK	Shell: Exploration Manager
<i>Dr Larry Marks</i>	Canada	Shell: Upstream Manager
<i>Andrew Gifford</i>	UK	Asset management, Family Office Association

Dates of birth for each of these individuals have been provided to Global Witness.

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

(22) Smart E&P International Co., Limited:

Response stating that the beneficial owners of Smart E&P International Co., Limited are as follows:

Beneficial owner 1:

- *Full name:* U Kyaw Kyaw Hlaing (Managing Director)
- *Stake:* Owns 40% of the company
- *Date of birth:* Provided to Global Witness
- *Nationality:* Myanmar
- *Country of residence:* Myanmar

Beneficial owner 2:

- *Full name:* Daw Yadana Su Hlaing (Director)
- *Stake:* Owns 30% of the company
- *Date of birth:* Provided to Global Witness
- *Nationality:* Myanmar
- *Country of residence:* Myanmar

Beneficial owner 3:

- *Full name:* U Chit Nyi Nyi Hlaing (Director)
- *Stake:* Owns 30% of the company
- *Date of birth:* Provided to Global Witness
- *Nationality:* Myanmar
- *Country of residence:* Myanmar

Each of the beneficial owners fully own and control their company stakes.

Response further stated that the company's beneficial owners are not politically exposed persons, and that they could be contacted through the company's business address.

Smart E&P International Co., Limited address:

City Bank Building, 5th floor, Bannyar Dalar Road, Myin Galar Taung Nyunt Township, Yangon, Myanmar.

(23) 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.

(24) Tap Oil Limited:

Response stating that Tap Oil Limited is a publicly listed company, which has been listed on the Australian Securities Exchange since 17 September 1996.

The company information of Tap Oil Limited is on the ASX website at:

<http://www.asx.com.au/asx/research/companyInfo.do?by=asxCode&asxCode=TAP>

(25) Total E&P Activités Pétrolières:

Response stating that the company 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.

(26) 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 Limited response for text of this Joint Bidding Agreement).

(27) Win Precious Resources Pte. Limited

Response stating that Win Precious Resources Limited is a private limited company registered in Singapore. It is not a subsidiary company of any other company.

100% of the shares in Win Precious Resources Pte. Limited are owned by Htun Lynn Shein, the sole beneficial owner of the company. Htun Lynn Shein fully owns and controls his shares in the company, and does not act as proxy for any other individual. No other person owns shares in the company.

Identifying details of the company's beneficial owner are as follows:

Name: Htun Lynn Shein

Date of Birth: Provided to Global Witness

Country of Residence: Myanmar

Address: Room 302, Shwe Than Lwin Condo, New University Avenue, Aye Yate thar 1 Road, Bahan Tsp, Yangon, Myanmar

Htun Lynn Shein is the managing director of Win Precious Resources, the managing director of another Myanmar registered mining company, Myauk Kyun Thu Ma Ma Co Limited, and a shareholder of Myanma Precious Resources Co Limited.

(28) Woodside Energy (Myanmar) Pte Limited:

Response stating that Woodside Energy (Myanmar) Pte Limited is a wholly owned subsidiary of Woodside Energy Limited which in turn is a wholly owned subsidiary of Woodside Petroleum Limited which is listed on the Australian Stock Exchange.

Details of this ownership structure are set out at page 132 (see extract below) of Woodside Petroleum Limited'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)).

Notes to and forming part of the Financial Report

For the year ended 31 December 2012

35. Subsidiaries

(a) Subsidiaries

Name of entity	Notes	Country of incorporation
Parent entity		
Woodside Petroleum Ltd	(1,2,3)	Australia
Subsidiaries		
Woodside Energy Ltd	(2,3,4)	Australia
Woodside Energy Holdings Pty Ltd	(2,4)	Australia
Woodside Energy Holdings (USA), Inc	(4)	USA
Woodside Energy (USA), Inc	(4)	USA
Gryphon Exploration Company	(4)	USA
Gander, Inc (formerly ATS, Inc)	(4,7)	USA
Woodside Offshore LLC	(4,8)	USA
Woodside Natural Gas, Inc	(4)	USA
Avila 8 LLC	(4,9)	USA
Woodside Energy (Peru) Pty Ltd	(2,4)	Australia
Woodside Energy (Myanmar) Pte Ltd	(10)	Singapore
Woodside Energy (Algeria) Pty Ltd	(2,4)	Australia
Woodside Technical Services Pty Ltd	(2,4,6)	Australia
Metasource Pty Ltd	(2,4)	Australia
Woodside Guangdong Shipping (One) Pty Ltd	(2,4)	Australia
Woodside Guangdong Shipping (Two) Pty Ltd	(2,4)	Australia
Woodside Mauritania Investments Pty Ltd	(2,4,6)	Australia
Woodside Energy Holdings (UK) Pty Ltd	(2,4)	Australia
Woodside Energy (UK) Ltd	(4)	UK
Woodside Energy Iberia S.A.	(4)	Spain
Woodside Energy (N.A.) Ltd	(4)	UK
Woodside Energy (Kenya) Pty Ltd	(2,4)	Australia
Woodside Energy (Carbon Capture) Pty Ltd	(2,4)	Australia
Woodside Energy (ISL) Pty Ltd	(2,4)	Australia
Woodside West Africa Pty Ltd	(2,4)	Australia
Woodside Energy Technologies Pty Ltd	(2,4)	Australia
Woodside Energy (Norway) Pty Ltd	(2,4)	Australia
Woodside Energy (M.E.) Pty Ltd	(2,4)	Australia
Woodside Energy Middle East and Africa Pty Ltd	(2,4)	Australia
Woodside Browse Pty Ltd	(2,4)	Australia
Woodside Burnup Pty Ltd	(2,4)	Australia
Pluto LNG Pty Ltd	(5)	Australia
Burnup Facilities Company Pty Ltd	(5)	Australia
Burnup Train 1 Pty Ltd	(5)	Australia
Woodside Energy Australia Asia Holdings Pte Ltd	(4)	Singapore
WelCap Insurance Pte Ltd	(4)	Singapore
Woodside Energy (Korea) Pte Ltd	(4)	Singapore
Woodside Energy Holdings (South America) Pty Ltd	(2,4)	Australia
Woodside Energia (Brasil) Investimento em Exploração de Petróleo Ltda.	(4)	Brazil
Woodside Finance Ltd	(2,4)	Australia
Woodside Petroleum Holdings Pty Ltd	(2,4)	Australia
Woodside Petroleum (Timor Sea 19) Pty Ltd	(2,4)	Australia
Woodside Petroleum (Timor Sea 20) Pty Ltd	(2,4)	Australia
Mermaid Sound Port and Marine Services Pty Ltd	(2,4)	Australia
Woodside Group Staff Superannuation Pty Ltd	(2,4,6)	Australia
Woodside Petroleum (Northern Operations) Pty Ltd	(2,4)	Australia
Woodside Petroleum (W.A. Oil) Pty Ltd	(2,4)	Australia

(1) Woodside Petroleum Ltd is the ultimate holding company and the head entity within the tax consolidated group.

(2) These companies were members of the tax consolidated group at 31 December 2012.

(3) Pursuant to ASIC Class Order 98/1418, relief has been granted to the controlled entity, Woodside Energy Ltd from the Corporations Act 2001 requirements for preparation, audit and publication of accounts. As a condition of the Class Order, Woodside Petroleum Ltd and Woodside Energy Ltd are parties to a Deed of Cross Guarantee.

(4) All subsidiaries are wholly owned except for those listed in Note 5 below.

(5) Kansai Electric Power Australia Pty Ltd and Tokyo Gas Pluto Pty Ltd each have 5% of the shares in these companies.

(6) These companies were deregistered on 7 August 2012.

(7) The dissolution of Gander Inc was effective on 5 December 2012.

(8) The dissolution of Woodside Offshore LLC was effective on 1 November 2012.

(9) The dissolution of Avila 8 LLC was effective on 7 January 2011 and formally notified to the authorities on 10 October 2012.

(10) Woodside Energy (Myanmar) Pte Ltd was incorporated on 5 December 2012.

Endnotes

1. See Global Witness, 'Rigged? The Scramble for Africa's Oil, Gas and Minerals', January 2012 for illustrative case studies from Angola, Nigeria and the Democratic Republic of Congo. Available at <http://www.globalwitness.org/rigged/rigged.pdf>.
2. Global Witness is an alternate member of the international board which oversees the EITI scheme globally.
3. The term 'ultimate beneficial owner' refers to any real, live individual who ultimately owns and controls a company. For a full definition, see Section 2 of the briefing.
4. Myanmar Ministry of Energy, 'Joint Statement on Good Governance and Transparency in the Energy Sector', 29 May 2013. Available at <https://www.facebook.com/photo.php?fbid=584321578255379&set=pb.358148424206030.-2207520000.1397782048.&type=3&theater>.
5. The EITI process is overseen by a multi-stakeholder group comprising representatives of government, companies and local civil society. In Myanmar, energy companies Total, Petronas, MPRL and Goldpetrol are members of this multi-stakeholder group and, as such, they play a direct role in shaping and managing Myanmar's EITI process.
6. In total, Global Witness has contacted 50 companies for this survey. This includes one company, Lin Win Co., which was listed as a block winner in the Myanmar Ministry of Energy award announcement but which we understand has been replaced by another Myanmar local company, Century Bright Gold Co. We have therefore counted Century Bright Gold Co as a block winner but not Lin Win Co. In addition, Siren E&P has informed us that it holds oil and gas block stakes, despite not being listed in the Ministry award announcement, so we have considered it as a block winner. One company, BG Group plc, responded on behalf of the official winners, BG Asia Pacific Pte Limited and BG Exploration and Production Myanmar Limited, so we have considered these entities as one company. Similarly, ENI has responded on behalf of official winners Eni Myanmar BV and Eni so we have counted these entities as part of one company. Consequently, we have calculated the total number of block winners as 46 companies.
7. In June 2014, Global Witness published the initial responses to our requests for company ownership information, raising concerns over the fact that only two private companies had provided full responses (see www.globalwitness.org/myanmaroilandgas/ for further details). The briefing was accompanied and followed by media coverage highlighting concerns over opaque ownership in Myanmar's oil and gas sector. See, for example: Peel, M., 'The opaque world of Myanmar's oil industry', Financial Times, 26 June 2014. Available at <http://www.ft.com/cms/s/0/bb0e732c-fc6e-11e3-86dc-00144feab7de.html#axzz3EFzJn1M8>; Win, T.L., 'High level of corporate secrecy in Myanmar oil and gas sector – survey', Thomson Reuters Foundation, 26 June 2014. Available at <http://www.trust.org/item/20140626093237-hwfra/>.
8. Van der Does de Willeboes, E et al, 'The Puppet Masters: How the Corrupt use Legal Structures to Hide Stolen Assets and What to Do About It', World Bank, 2011, Annex B. Available at <http://hdl.handle.net/10986/2363>.
9. For further examples of the abuse of anonymous companies, see <http://www.globalwitness.org/campaigns/corruption/anonymous-companies>.
10. UNICEF, 'From Natural Resource to Human Capital: Practical, feasible, immediate resourcing solutions for Myanmar's children', August 2013. Available at http://www.unicef.org/eapro/From_Natural_Resources_to_Human_Capital.pdf.
11. Ash Center for Democratic Governance and Innovation, 'Creating a Future: Using Natural Resources for New Federalism and Unity', July 2013; Turnell, S., 'Natural Gas Exports and the Missing Billion', 2007; Myanmar Centre for Responsible Business et al, 'Myanmar Oil & Gas Sector-Wide Impact Assessment', September 2014.
12. Global Witness, 'Diamonds: A Good Deal for Zimbabwe?', February 2010. Available at http://www.globalwitness.org/sites/default/files/library/A_GOOD_DEAL_FOR_ZIMBABWE.pdf.
13. FBI San Francisco Department, 'Former Ukrainian Prime Minister Sentenced to 97 Months in Prison Fined \$9 Million for Role in Laundering \$30 Million of Extortion Proceeds', 19 November 2009. Available at <http://www.fbi.gov/sanfrancisco/press-releases/2009/sf111909a.htm>.
14. SA vs Pavel Ivanovych Lazarenko, second superseding indictment, paragraphs 9 and 10. Available at <https://www.documentcloud.org/documents/1308167-second-indictment-lazarenko.html>.
15. Stolen Asset Recovery Initiative, database, Pavel I Lazarenko, <https://star.worldbank.org/corruption-cases/node/18662> and Dugsbery, <http://star.worldbank.org/corruption-cases/node/19091>. Further details of how Lazarenko bought a bank to help launder money available from Puppet Masters, Stolen Asset Recovery Initiative, <http://star.worldbank.org/corruption-cases/node/18662>.
16. Etete was convicted of money laundering in France in 2007.
17. Energy Venture Partners v Malabu Oil & Gas, Commercial Court, Queen's Bench Division, 2011-13. The case was bought by a broker who alleged that Etete failed to pay him for work he had done in obtaining a buyer for OPL245. Shell and Eni were not part of the proceedings.
18. After General Abacha died in 1998, the administration of Nigerian President Obasanjo revoked Malabu's licence and awarded it to Royal Dutch Shell, but after much legal wrangling Malabu was re-awarded the license in 2006.
19. Myanmar Centre for Responsible Business et al, 'Myanmar Oil & Gas Sector-Wide Impact Assessment', September 2014, p.62. Two of these blocks were awarded in the October 2013 round, and Global Witness has therefore contacted the companies that won them during this review process.
20. Email sent to Global Witness by a Myanmar civil society representative following the release of our 'Who are the real owners of Myanmar's latest oil and gas block sales?' briefing in June 2014.

21. The beneficial ownership concept is already used in the context of anti-money laundering laws. The Financial Action Task Force (FATF), the intergovernmental body which sets global anti-money laundering standards, defines a beneficial owner as 'the natural person(s) who ultimately owns or controls a customer', where reference to ultimate ownership or control refers to situations in which 'ownership/control is exercised through a chain of ownership.', FATF (2012), 'International Standards on Combating Money Laundering and the Financing of Terrorism & Proliferation', p.110.
22. Global Witness began reaching out to companies with ownership information requests in February 2014. Since then, the EITI has developed a standard and more detailed beneficial ownership declaration form, with input from Global Witness. This form is available at <http://eiti.org/pilot-project-beneficial-ownership/>.
23. For further details of the responses received by 26 June 2014, see www.globalwitness.org/myanmaroilandgas/.
24. Myanmar Ministry of Energy, 'Awarded Companies and Related Blocks for Myanmar Onshore Blocks Bidding Round—2013', undated. Available at <https://www.facebook.com/photo.php?fbid=644593565561513&set=pb.358148424206030.-2207520000.1397782048.&type=3&theater>. Accessed on 1 October 2014.
25. Myanmar Ministry of Energy, 'Selected Candidates with local Companies for Myanmar Offshore Blocks Bidding Round—2013', undated. Available at <https://www.facebook.com/photo.php?fbid=731330843554451&set=pb.358148424206030.-2207520000.1397636327.&type=3&heater>. Accessed on 1 October 2014.
26. The Myanmar Ministry of Energy offshore award announcement states that Lin Win Co., Limited is the Myanmar partner for block M-15 (see Ministry of Energy Facebook page, <https://www.facebook.com/photo.php?fbid=644593565561513&set=pb.358148424206030.-2207520000.1397782048.&type=3&theater>). However, Canadian Foresight Group Limited which is one of the international companies with a stake in Block M-15 has stated to Global Witness that the local partner is, in fact, Century Bright Gold Co., Limited a subsidiary of KMA Group.
27. The Myanmar Ministry of Energy offshore award announcement states that Myanmar Petroleum E&P Co. Limited is the local partner for Blocks A-7, AD-5, A-4 and AD-2. However, one of the international companies with stakes in these four blocks, Woodside Energy (Myanmar) Pte. Limited has stated to Global Witness that the is no Myanmar partner for Blocks AD-2 and AD-5.
28. The Myanmar Ministry of Energy onshore award announcement states that Blocks O and J have been awarded to Petroleum Exploration (PVT) Limited (PEL) (see Ministry of Energy Facebook page, <https://www.facebook.com/photo.php?fbid=644593565561513&set=pb.358148424206030.-2207520000.1397782048.&type=3&theater>). However, international company Siren E&P Limited (Siren) has stated to Global Witness that these blocks were awarded to a British-Pakistani joint venture, with Siren as the British co-venturer and PEL as the Pakistani co-venturer. Siren has also stated to Global Witness that Parami Energy Development Co. Limited (Parami) and Precious Stone Mining Co. Limited are both Myanmar partners for Block O, and that Parami is the Myanmar partner for Block J.
29. G8, 2013 Lough Erne Leaders Communiqué, 2013. Available at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/207771/Lough_Erne_2013_G8_Leaders_Communique.pdf.
30. At the UK hosted Open Government Partnership Summit 2013, Prime Minister David Cameron announced plans to create a publicly accessible registry of information on beneficial ownership in the UK. A transcript of the speech delivered on 31 October 2013 is available at <https://www.gov.uk/government/speeches/pm-speech-at-open-government-partnership-2013>. In the June 2014 Queen's Speech, the UK Government announced that it will legislate for an open, publicly available register of beneficial ownership. Cabinet Office, 'Queen's Speech 2014', available at www.gov.uk/government/publications/queens-speech-2014-what-it-means-for-you/queens-speech-2014-what-it-means-for-you.
31. Speech by Pierre Moscovici, Minister of Economy and Finance, French Republic, 11 October 2013. Available at <http://www.cfr.org/france/conversation-pierre-moscovici/p31546>.
32. In February 2014, the European Parliament civil liberties and economic affairs committees voted to amend the anti-money laundering directive to require EU countries to create public registers of who really owns and controls companies. The Parliament will have to formally agree a deal with European governments before this becomes law. European Parliament, 'Parliament toughens up anti-money laundering rules, 11 March 2014. Available at <http://www.europarl.europa.eu/news/en/news-room/content/20140307ipr38110/html/Parliament-toughens-up-anti-money-laundering-rules>.
33. For further details of countries participating in the official EITI pilots, and the latest progress in each, see <http://eiti.org/pilot-project-beneficial-ownership>.
34. Allegations of land grabbing, environmental damage and other adverse impacts associated with projects such as the Letpadaung coppermine and the Shwe Gas pipeline have led to widespread public protests, and in the former case a parliamentary investigation. For examples of media coverage of these protests, see International Business Times, 'China and Myanmar Activists Joust Over Controversial Shwe Oil and Natural Gas Pipeline', 6 August 2013. Available at <http://www.ibtimes.com/china-myanmar-activists-joust-over-controversial-shwe-oil-natural-gas-pipeline-1373579>. Radio Free Asia, 'Residents Protest Letpadaung Copper Mine Resumption', 15 October 2013. Available at <http://www.rfa.org/english/news/myanmar/letpadaung-10152013190656.html>.



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