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Our ref: LRT/70-40576887

7 August 2015

BY EMAIL

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Dear Sir/Madam

## **SOCO International plc ("SOCO")**

Thank you for your letters of 29 July 2015.

Initially, as a responsible business we would underscore this firm's commitment to the principles espoused by the UN Global Compact. We will always consider, when engaging with a client, whether that engagement is consistent with our commitment to those principles; and we regard our engagement by SOCO in relation to the allegations made against it in connection with its work in Block V, to be so.

Against that background, you will of course appreciate that we have professional obligations of confidentiality to all our clients, our communications and advice to our clients are privileged and, as such, we are not in a position to address fully the points you raise. We have, however, forwarded your letters to SOCO.

With that said, you will have seen what SOCO has already reported and we are authorised to say the following.

The purpose of our review was to assess whether there is evidence supporting the allegations of bribery made by various organisations. We defined and focused the review on the evidence which we considered to be most relevant. In this context, SOCO provided us with access to the personnel, processes and documents we requested, sufficient to advise the Board as to the appropriate steps to be taken. This review was of a nature that will be conducted routinely by law firms for their clients.

167636-3-7304-v1.2

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## C L I F F O R D C H A N C E

As to the bribery allegations, we concluded that the allegations of bribery were substantially inaccurate. We found non-material instances where those with whom the Company worked made payments in breach of Group policy. These are subject to remedial advice.

We also confirmed that the Company provided funding to various Governmental authorities (e.g., military escorts) for the performance of legal and legitimate activities required for the performance of SOCO's and the DRC government's obligations under the Production Sharing Agreement. We found no evidence that any such payment was made to secure any unentitled advantage or to curry special treatment.

Further, in reviewing the material for the purposes of our work we were asked to notify SOCO if there was any evidence contradicting SOCO's conclusion, based on its prior internal review, that it or any of its employees had not been complicit in any intimidation and/or human rights abuses. We found no such evidence.

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Yours faithfully

Clifford Chance LLP