



Linsi Crain
Senior Advisor
Human Rights Lead

Public Policy & Corporate Responsibility
Policy, Government & Public Affairs
6101 Bollinger Canyon Road, G-2208
San Ramon, CA 94611
humanrights@chevron.com

May 24, 2016

Via email to BurmaPublicReport@state.gov
United States Department of State
2201 C Street NW
Washington, D.C. 20037

Unocal Myanmar Offshore Co., Ltd., ("UMOL") an indirect wholly owned subsidiary of Chevron Corporation submits this report in accordance with the U.S. Department of State's Responsible Investment Reporting Requirements. By my signature below, UMOL acknowledges that the attached report will be made public. No information included in the attached report is exempt from public disclosure under the Freedom of Information Act, Exemption 4.

Please contact me if you have any questions regarding our submission.

Sincerely,

A handwritten signature in blue ink that reads "Linsi Crain".

Linsi Crain

Attachments:

The Chevron Way
Chevron Business Conduct and Ethics Code



submission to U.S. department of state

responsible investment in Myanmar

May 2016

human energy®



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Cover photo: Gyeik Daw.

Inside front cover photo: Kalaya Oo, Chevron Myanmar stakeholder engagement advisor, describes the grievance mechanism process to Gwa fishermen.



summary

Unocal Myanmar Offshore Co., Ltd., (“UMOL”) an indirect wholly owned subsidiary of Chevron Corporation (“Chevron”) submits this report in accordance with the U.S. Department of State’s Responsible Investment Reporting Requirements. UMOL acknowledges that this report will be made public. We do not consider any information presented in this public report to be exempt from public disclosure under Freedom of Information Act (FOIA) Exemption 4.

In 2015, UMOL acquired new exploration acreage in Block A5 located offshore Burma (Myanmar) and subsequently commenced an exploration program which forms the basis of this report. UMOL is in the early stages of its exploration of Block A5 and most recently completed a preliminary seismic survey of the newly acquired block.

Chevron is committed to responsible business conduct, ethics, and respecting human rights. We reinforce these commitments through our management systems, corporate policies, and corporate responsibility performance which apply to our responsible investment in Myanmar. These concepts are embodied in [The Chevron Way](#), a set of values that describe who we are and how we work, placing priority on protecting people and the environment, respecting the law, supporting universal human rights, and maintaining high ethical standards.

Chevron has focused on safely developing and delivering affordable energy to help spur economic growth and

development and improve quality of life around the world. Since acquiring Unocal in 2005, this focus has included our investments in Myanmar.

As a result of Chevron’s acquisition of Unocal in 2005, UMOL became an indirect wholly owned subsidiary of Chevron. UMOL holds a 28.3 percent nonoperated working interest in a production sharing contract for the production of natural gas from blocks M5 and M6 in the Andaman Sea which it has held since 1992. UMOL also has a 28.3 percent nonoperated interest in a pipeline company that transports natural gas to the Myanmar-Thailand border for delivery to power plants in Thailand. The remaining volumes are dedicated to the Myanmar market. These operations pre-existed the current U.S. Department of State’s Responsible Investment Reporting Requirements, do not constitute a “new investment” and are, therefore, exempt from the instant reporting requirements. The existing operations are mentioned here to acknowledge UMOL’s presence in Myanmar prior to the newly acquired interest in and operatorship of Block A5 in March 2015. Chevron’s Downstream companies operating in Singapore and Thailand sell finished products such as lubricants, diesel and fuel to companies located in Myanmar but have no operational presence in Myanmar. These sales are either direct to the end customer in Myanmar or through established distributors in the region. There is no “new investment” in Myanmar as result of these product sales which, therefore, do not give rise to a reporting requirement.

submitter

Unocal Myanmar Offshore Co., Ltd. (“UMOL”)

points of contact

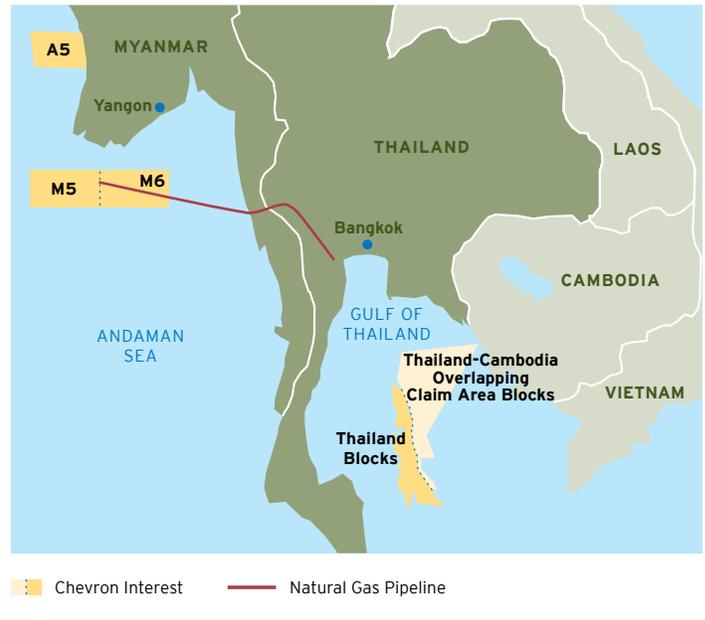
Kirsten Knoepfle-Thorne, Manager, Global Issues and Public Policy
Linsi Crain, Human Rights Lead
Chevron Corporation
6001 Bollinger Canyon Road, Room G-2204, San Ramon, CA 94583-2324

overview of operations in Myanmar

In March 2014, UMOL was selected as the high bidder for a 99 percent interest in and operatorship of Block A5. Block A5 is in the Rakhine Basin of the Bay of Bengal offshore Myanmar. It spans approximately 4,000 square miles (10,600 square kilometers), from shallow continental shelf waters near the southern Rakhine State mainland to beyond the shelf break into open ocean as deep as 7,700 feet (2,350 meters). On its eastern edge, the offshore boundary of Block A5 is defined as three nautical miles from the mainland coast. On March 24, 2015, a production sharing contract for Block A5 was signed between UMOL and Myanma Oil and Gas Enterprise (MOGE). Pursuant to this agreement, UMOL undertook geophysical data acquisition programs in Block A5 in late 2015.

UMOL's exploration and production interests in Myanmar are managed from an office in Yangon which currently employs four national employees and one expatriate employee. Additional support for these operations is provided from a regional office in Thailand.

This report covers the company's general policies and their application in support of the exploration and assessment of Block A5.



Coastline in Gyeik Daw fishing village.

operational excellence management system

Chevron is committed to safely develop and deliver energy while focusing on continually achieving the highest levels of safety, operational, environmental, and social performance. Chevron meets these challenges by continually improving its [Operational Excellence Management System \(OEMS\)](#).

The OEMS is our basis for addressing risk, assuring compliance, and continually improving performance within our global operating companies and business units.

The OEMS includes corporate expectations for addressing risks in key areas and assuring compliance in the following areas:

- Security of Personnel and Assets
- Facilities Design and Construction
- Safe Operations
- Management of Change
- Reliability and Efficiency
- Third-party Services
- Environmental Stewardship
- Product Stewardship
- Incident Investigation
- Stakeholder Engagement
- Emergency Management
- Compliance Assurance
- Legislative and Regulatory Advocacy

The entire OEMS and its connection to other company procedures is critical to how Chevron operates responsibly. This section will focus on UMOL's and Chevron's approach to human rights, worker rights, anticorruption, and environmental policies and procedures.



Morning catch at Ngapali Beach.



Monastic school in southern Rakhine State.

human rights

Chevron's respect for human rights is embedded into the company's values and articulated in our [Corporate Human Rights Policy](#). Our corporate policies, management processes, community investment programs, and participation in voluntary initiatives work together to reinforce our commitment to respecting human rights.

Chevron believes that while governments have the primary duty to protect and ensure fulfillment of human rights, we have a responsibility to respect human rights and can play a positive role in the communities where we operate. To this end, our conduct in global operations is consistent with the United Nations Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the Global Sullivan Principles, the Voluntary Principles on Security and Human Rights, the International Finance Corporation Performance Standard on Land Acquisition and Involuntary Resettlement, and the World Bank Operational Policy and Bank Procedure on Indigenous Peoples.

chevron's human rights policy

Chevron's Human Rights Policy, adopted in 2009, applies to our operations and employees and helps raise awareness of human rights throughout the company. Though the policy predates the UNGP adopted in 2011, it aligns with these principles.

Our policy addresses labor relations, contracting and procurement, stakeholder engagement, environmental protection, and security. The policy includes requirements for training and operations assessments specific to operating environments. It also sets clear guidelines for employees and line management to implement the policy with the necessary resources, support, and review.

Chevron's Human Rights Policy is shaped around four areas most salient to our business: employees, security, community engagement, and suppliers. Key elements of the policy are as follows.

Employees

We treat all of our employees with respect and dignity and promote diversity in the workplace. Our company policies and procedures adhere to applicable domestic laws and are consistent with ILO core labor principles concerning freedom of association and collective bargaining, nondiscrimination, forced labor, and underage workers in the workplace.

Security

We protect personnel and assets and provide a secure environment in which business operations can successfully be conducted. Our guidelines and management processes on security in our areas of operations are consistent with the Voluntary Principles.

Communities

We respect human rights in the following ways:

- Through our contributions to socioeconomic development in the communities where we operate.
- By fostering ongoing, proactive two-way communication with communities and knowledgeable stakeholders.
- Through our corporate Environment, Social and Health Impact Assessment (ESHIA) process for all major capital projects as well as for certain existing operations.
- Through our corporate guidance on indigenous peoples, resettlement, and grievance mechanisms, which are consistent with applicable external guidelines.

Suppliers

We encourage our suppliers to treat their employees and to interact with communities in a manner that respects human rights and is consistent with the spirit and intent of this policy. We require that our key suppliers adhere to all applicable domestic laws and encourage them to be consistent with ILO core labor principles. We also engage with our key suppliers to reinforce awareness of potential human rights issues. [Chevron's Business Conduct and Ethics Expectations for Suppliers and Contractors](#) supports our Human Rights Policy.



Fishermen offload their catch at sunrise near the Ngapali Temple.

Human rights-related guidance on community

Indigenous peoples

Chevron's *Indigenous People's Guidance* document outlines building blocks for effective management of relations with indigenous peoples, including: Stakeholder Identification, Defining the Regulatory Framework, Pre-Consult and Define a Preferred Method of Engagement, Assess Potential Impacts and Benefits, Conduct Community Consultations, and Develop and Implement Indigenous Peoples Plans.

Resettlement

Chevron's *Resettlement Guidance* document provides a framework for projects and operations to utilize when considering resettlement, from assessment and planning to implementation. Resettlement objectives include informed business decision making, partner alignment, and consultation with affected persons.

Operational-level grievances

Chevron's *Grievance Mechanism Guidance* document outlines steps for operations to design or update an operational-level grievance mechanism that strives to be legitimate, accessible, predictable, equitable, transparent, and rights-compatible. The mechanism should be based on engagement and dialog and promote continuous learning.

human rights policy application

Chevron's decision whether to invest in a country or a particular project or to continue or cease operations requires consideration of financial and nonfinancial criteria. For instance, we assess whether operating conditions will allow us to provide a safe and secure environment for our personnel and assets and support human rights and anticorruption.

Human rights due diligence or assessments include potential impacts to natural resources, water use, community health, human rights, and livelihoods. The information gathered through these processes is integrated into project decision making on environmental, social, and health issues and to identify potential community or stakeholder benefits. Chevron's Human Rights Policy and related processes and guidance provide direction on how to manage potential issues in our operations associated with resettlement, grievances, and groups such as indigenous peoples. Chevron's social and community impact assessments specific to the Myanmar exploration program are outlined later in this report.



Kalaya Oo, Chevron Myanmar stakeholder engagement advisor, reviewing the grievance mechanism process.

human rights training

On an ongoing basis, Chevron provides various levels of training for individuals and functions most likely to encounter issues related to human rights in the areas where we do business. Our suite of human rights training includes awareness-raising for employees and contractors, computer-based training that targets key functions and regions, and location-specific training.

Chevron's human rights corporate staff recently conducted in-person training sessions on Chevron's Human Rights Policy for staff in Myanmar and 160 employees in Chevron's Asia South Business Unit. The training targeted Chevron regional leadership, focus functions, and supporting teams in Supply Chain Management and Procurement; Human Resources; Security; Policy, Government and Public Affairs; Health, Environment and Safety; Law; Compliance; and Information Technology. The training covered potential risks, due diligence, and mitigation activities that are available to each function. Each team discussed its specific roles and responsibilities to steward the policy. In-person training sessions were augmented with Chevron's Human Rights Policy computer-based training for business units and Myanmar staff.



Consultation with fishermen in Gwa.

community and stakeholder engagement

At Chevron, stakeholder engagement is a continual process through which the views of individuals or groups are sought and considered in decision making. It is critical in identifying and mitigating risk, bringing about sustainable social and economic development, and fostering constructive relationships. Listening to and engaging appropriate stakeholders improves our ability to anticipate change; avoid or manage conflict; identify emerging issues, trends, and opportunities; appreciate cultural diversity; and understand key economic, environmental, and social issues that affect our decision making and performance.

The underlying principles for our stakeholder engagement are outlined in The Chevron Way – “building productive, collaborative, trusting and beneficial relationships with governments, other companies, our customers, our communities and each other.” It is a cornerstone of our vision “to be *the* global energy company most admired for its people, partnership and performance.” Several corporate guidance documents identify stakeholder engagement as a key business requirement.

Chevron Stakeholder Engagement Process guides are based on energy industry best practices, define stakeholder engagement, and explain its importance to our business. As stakeholder engagement is practiced at both the corporate, regional, and local levels of Chevron, the process provides general guidance, principles, and steps for identifying stakeholders, planning and executing an engagement process that can be scaled to local operating environments, and specific business requirements. In summary, the process requires that:

- A system is in place to identify stakeholders and to plan and execute engagement with them that promotes mutual understanding about projects, operations, facilities, and products.
- Chevron fosters ongoing two-way engagement with communities, nongovernmental organizations (NGOs), government and regulatory authorities, and other appropriate stakeholders to address potential security, safety, health, environmental, supply chain, social, human rights, and other concerns.
- Appropriate plans are in place and updated on a continual basis to include stakeholder engagement, issues management, and social investment.



Large boats docked at Tha Byu Gyaing.

corporate responsibility in Myanmar

In the oil and gas exploration process, it can take many years before decisions can be made that a resource can be safely and responsibly produced. Chevron seeks to align risk-based due diligence processes and procedures with this long-term time horizon. As UMOL prepared to launch its Block A5 exploration program with the acquisition of seismic data in the third quarter of 2015, the company pursued various due diligence procedures as outlined on the following pages: initial environmental examination for seismic work; seismic community consultations; fishing community outreach; the grievance mechanism; human rights at sea; and social performance opportunity review. Consultation highlights and a summary of the stakeholders consulted are also provided.

Initial environmental examination for seismic work

According to the Environmental Conservation Law and the Environmental Conservation Rules of the Republic of the Union of Myanmar, all projects undertaken in Myanmar which have the potential to cause significant environmental and social impacts are required to undertake an [Initial Environmental Examination \(IEE\)](#) or an Environmental Impact Assessment (EIA) and to obtain an Environmental Compliance Certificate (ECC). Per the Ministry of Environmental Conservation and Forestry (MOECAF) draft EIA procedures, offshore oil and gas seismic exploration falls within the category of IEE as the appropriate level of assessment. UMOL commissioned an international firm, supported by local specialists, to undertake an IEE for the proposed geophysical data acquisition programs in Block A5.

The IEE considered the following:

- Physical environment, including climate and meteorology, storms and cyclones, earthquakes, tsunami, current and tides, and seabed topography.
- Biological environment, including fish communities, marine mammals, marine reptiles, seabirds, coral habitats, mangroves, seagrass, and protected and environmentally sensitive areas.
- Socioeconomic environment, including baseline information of the fishing activities that may occur within the survey area, as well as details on southern Rakhine State and the country profile.

Through data collection with coastal governments and communities and desktop review, a socioeconomic baseline of the project site was established. The baseline data obtained was used to characterize the project site and assess potential environmental and social impacts from the proposed geophysical data acquisition programs at Block A5.

Appropriate mitigation and management measures were recommended for potential negative impacts from exploration which were then documented in UMOL's Environmental and Social Management Plan for Block A5. The executive summary of this report is available in both Myanmar language and English at Chevron.com.

Seismic community consultations

UMOL's internal and commissioned studies, including the IEE, identified southern Rakhine as the salient geography for the environmental and social considerations for UMOL's offshore exploration activity. Therefore, local communities in the identified project area were prioritized as key stakeholders for engagement programs. The IEE further emphasized the importance of the area's fishing community, which was also reflected in our engagement. UMOL teams conducted consultation activities in southern Rakhine before, during, and after the Block A5 seismic data acquisition was completed. UMOL's visits to the project area were focused on building relationships, sharing information, answering questions, and receiving feedback from communities and other key stakeholders.

During the pre- and midseismic consultations, UMOL visited several townships and villages and conducted detailed presentations on the exploration activity, timelines, potential environmental and social impacts and their proposed mitigation measures, and the IEE process. UMOL conducted question and answer sessions wherein participants raised questions, shared concerns, sought information, and provided suggestions. The discussions included participants from UMOL and the government. Focused group discussions were also conducted with the stakeholder groups to obtain preliminary understanding of fishing and related issues. Women were engaged separately in some instances in order to facilitate gender-specific discussions. A key input

from the stakeholders engaged was agreement on the proposed engagement process, including timing, methods, and management of grievances. The Chevron Myanmar Grievance Mechanism was shared widely, and copies of grievance forms in Myanmar language were left behind during consultations.

People in the villages were given time to share their concerns and views and to obtain any explanation they required. The information was communicated through visual media and provided in Myanmar language. In cases where the response was provided in English, the translation to local language was provided.

Fishing community outreach

In recognition of the importance of the fishing community as a key stakeholder group, strategic consultations with its members were undertaken to understand their business and explore any potential interaction or impacts from offshore oil and gas seismic acquisition activity. Consultations with groups of fishermen were guided by use of maps explaining the Block A5 location and to gather information to understand fishing patterns and locations. The fishermen were encouraged to discuss and agree on the information that they as a group provided to the stakeholder engagement team. They were encouraged to use maps to identify fishing locations. All information was used to help validate the project team's understanding of potential encounters with fishermen and impacts working at sea.

The normal fishing areas mentioned by the fishermen suggested that there could be fishing activities, though few, in the proposed project area, which is approximately 8.5 miles (14 kilometers) from the mainland coast. The information collected from fishermen was supplemented through site reconnaissance of fishing villages, fish landing activity (especially during early morning), fish sorting and processing (including drying, salting, and icing), local fish markets and supportive infrastructure.

To address potential impacts from the seismic surveys on the fisheries and the fishing community, several controls were identified. For the exploration period, it was established that early warning of seismic vessel positioning and its mobile exclusion zone would be imperative for the fishing community due to the time and effort involved in spreading and collecting fishing nets. The seismic contractor created a detailed plan for the movement of the survey vessels in the operational area. Information related to the approximate locations of the movement of the seismic vessel was made available to the fishing community through different sources (e.g. notices to mariners, village tract leaders, posted at ports, Department of Fishing, and fishing associations), on a real-time basis, so that potential impacts on the fishing community and their equipment could be avoided. Two vessels with Burmese-speaking fisheries liaison officers were employed to ensure navigational safety and appropriate management of interactions with fishing vessels. A mobile exclusion zone limited the duration and extent of disruption to the fishing activity in any area.



The Kyeintali Stream provides safe harbor for fishing and transport boats.

Grievance mechanism

During pre-seismic consultations in the third quarter of 2015, Chevron launched the [Myanmar Grievance Mechanism](#) as part of our overall stakeholder engagement program. The mechanism and a grievance officer were put in place to receive feedback and issues directly related to UMOL's offshore data acquisition. The mechanism is designed to receive and manage feedback in a consistent and transparent manner. Stakeholders who believe they have been impacted by the offshore data acquisition may access the mechanism. The grievance mechanism and forms were shared with community, Department of Fisheries, and General Administration Department stakeholders during consultation visits prior to commencement of offshore activities and was posted in public places throughout the exploration area.

During UMOL's post-seismic stakeholder consultation conducted in February 2016, the grievance officer evaluated several potential grievances from the fishing community. One grievance was determined to not require further action and was closed after the stakeholder was consulted. Other potential grievances were determined to be unrelated to UMOL activity and UMOL's grievance officer connected those stakeholders to another company conducting seismic offshore during the relevant time frames.

The grievance mechanism will continue to be used to support UMOL's Block A5 activity and can be found on [Chevron.com](#). Feedback can be submitted through these channels.

Web: [Chevron.com](#)
E-mail: blockA5@chevron.com
Phone: +95 09781312824
Post: P.O. Box 963
Yangon General Post Office
Yangon 1181
Myanmar

UMOL's grievance officer also regularly contacted key local government officers and community leaders during the seismic acquisition program to check if they had received any community complaints or grievances related to Chevron's operations.

Human rights at sea

It was identified that the vessels involved in the seismic study could possibly happen upon vessels in distress. Obligations to people in distress at sea are enshrined in international laws such as the 1974 International Convention for the Safety of Life at Sea (SOLAS Convention), the 1977 International Convention on Maritime Search and Rescue (SAR Convention), and the 1982 United Nations Convention on the Law of the Sea (UNCLOS). Training was provided to the seismic contractor onboard the vessel ahead of its transfer to Myanmar and also to new crews aboard the vessel during the operation given the crew rotation. A discussion and review of the contractor's processes was conducted to ensure that all parties were aware of the potential scenarios that may arise operating offshore in Myanmar. UMOL's objectives for these engagements were to confirm awareness of Chevron's expectations around human rights and knowledge of the relevant maritime conventions as well as alignment on those obligations and related protocols. The engagements included discussions around various potential scenarios and incorporated the Voluntary Principles.

There were no vessels or people in distress encountered in UMOL's 2015 Myanmar exploration activities.

Social performance opportunity review

In addition to our ongoing stakeholder engagement and the IEE, UMOL contracted with a well-respected international firm to conduct a social performance opportunity review in 2015–2016. The review will help shape our social strategy in support of Block A5 exploration and included a socioeconomic baseline study, a stakeholder analysis, a social investment review, and a human rights impact assessment (HRIA). Data from desk research (in Myanmar and English languages), extensive field work and interviews, and contractor in-country experience and experts were used to create final deliverables for UMOL to consider. UMOL will utilize the information gathered in this research, combined with the IEE and our own due diligence, to guide future stakeholder engagement, operational and environmental planning, social investment, risk management, and rights protection activities.

In support of capital projects under our control, Chevron uses its ESHIA process, which incorporates human rights due diligence to help the company consider how to safeguard the rights and interests of potentially affected communities. In special circumstances, Chevron teams can conduct an early stand-alone HRIA. The corporate, regional, and local team supporting exploration in Myanmar did so given the region's historical considerations and rapidly changing political landscape.

This initial HRIA employed a human rights-based approach, consistent with the UN Guiding Principles and in consideration of the seminal guidance documents on

such assessments and existing reports based on the region. The report identified issues most relevant to our business as well as early potential mitigation strategies. Prioritized items included: remedy, nondiscrimination, labor and worker protections, land rights and standard of living, security, education, and development.

UMOL is working to localize our corporate human rights policies and procedures to our business in Myanmar. UMOL will continue to monitor the socioeconomic situation and status of human rights in southern Rakhine and will consider updating our human rights management strategy as needed.

Consultation highlights

Consultation teams were actively conducting engagement and gathering data in southern Rakhine until late February 2016. This information will continue to be evaluated and considered in UMOL's planning of future activity.

Priorities of the stakeholders UMOL engaged included:

- Closing the gap in awareness of the offshore energy industry.
- Commercial and subsistence fishing livelihoods.
- Food security concerns in relation to both fishing territory access and marine environmental protection, as well as agricultural diversification and improvements.
- Potential cumulative impact from several offshore investments being considered by multiple companies.
- Access to water to support agriculture (specifically during the winter season) and livelihood diversification (aquaculture, for example).
- Transportation challenges and road infrastructure improvement.
- Interest in livelihood diversification, beyond fishing.
- Access to capital and credit.
- Access to affordable and reliable energy.
- Access to affordable quality educational systems.
- Prevalent health concerns such as diarrhea and malaria.
- Availability of medical staff, specifically specialists.
- Revenue transparency and benefit sharing structure between the national government and Rakhine state.
- Concerns regarding religious and ethnic conflict in northern Rakhine.

Stakeholder engagement will be a continuous process

throughout the life of our activity in Myanmar. Community engagement activities will be undertaken in consultation with partners and government, with the following purposes:

- Allow the local stakeholders to have an understanding of the UMOL's activities across the various phases.
- Monitor the effectiveness of the mitigation measures for potential impacts.
- Allow the local stakeholders to provide their feedback.

Stakeholders consulted

UMOL, Chevron, and its contractors conducted stakeholder consultations in connection with the aforementioned studies and as part of our ongoing stakeholder engagement. At Chevron, we define our stakeholders as individuals or groups who can affect, or are affected by, or have a legitimate interest in the company's performance. Regarding Myanmar, our stakeholders include a wide range of local, regional, and international groups and individuals. A representative list is below.

Southern Rakhine community groups

- Bawmi Village Tract community members
- Gake Latt Village community members
- Gwa fishermen
- Gyeik Daw community members
- Gyeik Daw fishermen
- Kalet Chaung Village community members
- Kha Maung community members
- Kyauk Chun Village community members
- Kyeintali community members
- Kyeintali fishermen
- Ma Kyi Ngu Village – diver
- Maw Yon Village community members
- My Kui Sin Village community members
- Pauk Tu Kwin Village community members
- Sattwar Village community members
- Sin Gaung community members
- Ta Laung Gyi Village community members
- Taung Pauk Village community members
- Tha Byu Gyaing Village Fishing and Boating Association
- Thandwe community and businessmen
- Thandwe District Women and Maternal Health Association (Mi Khin Hni Kalay)
- Thandwe District Women's Affairs Association
- Thandwe Township Maternal and Child Welfare Association
- Thandwe Township Women's Affairs Association
- Ya Haing Gadoe Fishing Businessmen
- Ya Haing Gadoe Village fishermen
- Ya Haing Gadoe Village tract administrator

Other southern Rakhine community

- Fishing markets in coastal communities

Myanmar civil society organizations

- 88 Generation
- Arakan Civil Society Network
- Arakan Natural Resources and Environmental Network
- Arakan Youth Organization
- Center for Diversity and National Harmony
- Kyauk Phyu Social Network Group
- Legal Clinic Myanmar
- Myanmar Center for Responsible Business
- NZAID and Adam Smith International – Rakhine Winter Crops Project
- Pipeline Watch Network
- Public Service Committee
- Rakhine Conservation Association leadership and members
- Rakhine Economic Initiative
- Rakhine Women's Union
- Strength of Unity (Gwa)
- Swanyee Development Foundation
- USAID Control and Prevention of Malaria Project and University Research Co. LLC
- Wan Lark

Individuals

- Christian leaders
- Independent member of Parliament
- Dr. Maung Maung Kyi
- Senior Buddhist monk
- Muslim leaders

Myanmar government

- Ministry of Energy
- Ministry of Environmental Conservation and Forestry
- Ministry of Fisheries, Livestock and Rural Development
- Ministry of Labor
- Myanmar Investment Commission
- Rakhine State chief minister
- Rakhine State cabinet members

Other governments

- United States Department of State
- United States Department of Commerce
- The White House National Security Council

Southern Rakhine government groups

- Arakan National Party
- Environment and Conservation Department
- Gyeik Daw General Administration Department
- Gyeik Daw Village head
- Gwa Department of Agriculture
- Gwa Department of Education (including high school headmaster)
- Gwa Department of Fisheries
- Gwa Department of Forestry (including Wildlife Conservation representative)
- Gwa Department of Health
- Gwa Department of Planning
- Gwa Department of Rural Development
- Gwa Electricity Power Corporation
- Gwa General Administration Department
- Gwa Police
- Gwa Township Development and Supporting Committee
- GwaTownship Development Council
- Kha Maung Fishing Association
- Kha Maung town administrator
- Kyauk Phyu District Department of Rural Development

Southern Rakhine government groups (continued)

- Kyauk Phyu District Fisheries officer
- Kyauk Phyu District Health officer
- Kyauk Phyu General Administrative Department
- Kyauk Phyu Township Education officer
- Kyeintali Department of Agriculture
- Kyeintali Department of Education
- Kyeintali Department of Fisheries
- Kyeintali Department of Forestry
- Kyeintali Department of Health (hospital)
- Kyeintali Department of Land Records
- Kyeintali Department of Telecommunications
- Kyeintali ESE (electricity)
- Kyeintali General Administration Department
- Kyeintali police chief
- Kyeintali Township Development Supporting Committee
- Kyeintali Ward Administrators
- Ma Kyi Ngu Village – village head
- Maw Yon Village Fishing Association
- Maw Yon Village General Administration Department
- Maw Yon Village Fishing Association
- National League for Democracy
- Rakhine Fisheries Department
- Rakhine Planning Department
- Rakhine Rural Development Department
- Sin Gaung administrator
- Sin Gaung Fishing Association
- Tha Byu Gyaing Village Tract administrator and village administrators
- Thandwe District Central Statistical Office
- Thandwe District Department of Agriculture
- Thandwe District Department of Education
- Thandwe District Department of Fisheries
- Thandwe District Department of Health
- Thandwe District Department of Planning
- Thandwe District Department of Public Health
- Thandwe District Department of Roads

Southern Rakhine government groups (continued)

- Thandwe District Department of Rural Development (Township level)
- Thandwe District Livestock Breeding and Veterinary Department
- Thandwe District Settlement and Land Records Department
- Thandwe General Administration Department
- Thandwe Port Authority
- Thandwe Township Department of Education
- Thandwe Township Department of Forestry
- Thandwe Township Department of Hotels and Tourism
- Thandwe Township Department of Land Records
- Thandwe Township Department of Livestock and Veterinary
- Thandwe Township Department of Planning
- Thandwe Township Department of Rural Development
- Thandwe Township Development and Supporting Committee
- Thandwe Township District Department of Fisheries
- Thandwe Township General Administration Department
- Toungup Degree College
- Toungup Department of Agricultural Land Management and Statistics
- Toungup Department of Fisheries
- Toungup Department of Forestry
- Toungup Department of Health
- Toungup Department of Meteorology
- Toungup Department of Planning
- Toungup Department of Rural Development
- Toungup division of Myanmar Police
- Toungup Electricity Power Corporation
- Toungup General Administration Department
- Toungup Township Development and Supporting Committee

International NGOs/development agencies

- Earth Rights International
- International Organization for Migration
- International Republican Institute
- Livelihoods and Food Security Trust (LIFT)
- Malteser
- Plan International
- Pact
- Relief International
- Save the Children
- Swisscontact
- United Nations Development Program
- UN-Habitat
- UNICEF
- UN High Commissioner for Refugees
- UN World Food Program
- Wildlife Conservation Society

Companies

- BG Group
- Daewoo
- Montrose
- MPRL
- Myanmar Oil and Gas Enterprise
- Total
- Woodside

social investment in Myanmar

One of the ways that we support the communities in which we work is through social investment. We partner with governments, NGOs, and community leaders to understand their needs and priorities, manage the impacts of our operations, and make strategic social investments throughout the life cycle of a project. We then work with partners to confirm needs and invest in solutions and programs that will create measurable and enduring value.

We contribute to local communities by making strategic social investments in three core areas: health, education, and economic development. Our recent due diligence will help us define Chevron's future social investment in Myanmar. Chevron's current social investment in Myanmar is aligned with our global strategy and targeted to these areas – improving access to health care, promoting sustainable livelihoods, and enabling education and training opportunities. Chevron has also previously supported disaster relief efforts.

Chevron supports the Sustainable Health Improvement and Empowerment (SHINE) project in the Dry Zone region. Implemented in long-term partnership with Pact Global Microfinance Fund (Pact), the project empowers communities to adopt behaviors to improve their health status and increases access to training opportunities. Built on a dozen years of successful partnership between Pact and Chevron, the project has supported more than 1.2 million people across 1,476 villages in 13 townships to bring sustainable health solutions and improved livelihood opportunities. More than 800,000 people have improved access to health care through the Village Health Development Fund under SHINE. Over 14,000 women engaged in savings and empowerment programs are earning 15 percent interest on their saved funds. And to date, SHINE has trained 10,644 community health volunteers to ensure sustainable health improvements in communities.

SHINE trains village-based volunteers, known as *change agents* to identify cases of tuberculosis, malaria, and childhood diseases while raising awareness among communities about disease transmission. Groups of mothers also meet regularly to learn about maternal and child care.

By improving community health awareness and supporting early detection and prompt treatment, there has been a significant decline in reported incidents of infection in these communities.

To improve livelihood opportunities SHINE facilitates a savings-led empowerment program in which groups of women form village banks and learn financial management skills, collectively saving and loaning to support microenterprise activities. The project also assists villages by establishing a community-managed village health and development fund to provide loans and grants for health-related emergencies and community development projects. Over the last decade, more than 1,300 communities have established such funds.

As part of our new investment in Block A5, Chevron added support in 2015 for a new program with Pact which aims to improve access to renewable energy in rural areas of Central Myanmar. The project aims to provide electricity access for 20,000 households representing approximately 100,000 people. Through a revolving capital fund, households will be able to access low-interest financing to purchase solar home systems. As the loans are repaid, the capital is returned to the revolving fund to be lent out to other households, while the interest generated is contributed to the village health and development fund.

Chevron also works with Pact in Kyaw Hmu Township, aiming to improve access to finance services for 3,000 borrowers and subsequently improving the livelihoods and food security of rural communities.

Through the American Chamber of Commerce in Myanmar, Chevron is also contributing to a scholarship fund which provides financial support for students at the University of Yangon. The program has supported 30 underprivileged undergraduate students who have demonstrated outstanding academic achievement and potential.

In 2015, Myanmar experienced severe flooding. Chevron responded immediately with a \$150,000 donation split between the American Red Cross and Pact.

worker rights

Chevron employs tens of thousands of people globally, creating local jobs and developing local workforces. The Chevron Way and our policies require that we treat all of our employees with respect and dignity and promote diversity in the workplace. Our company policies and procedures adhere to all applicable domestic laws and are consistent with International Labour Organization (ILO) core labor principles concerning freedom of association and collective bargaining, nondiscrimination, forced labor, and underage workers in the workplace.



Consultation with the Rahkine Conservation Association.

Employee grievance reporting

Employees may communicate workplace concerns through management, Chevron's ombuds program, [Chevron's Corporate Compliance Hotline](#), (available 24 hours a day, seven days a week) and their respective representation bodies.

Chevron's Global Office of Ombuds is an internal, confidential environment outside of formal reporting channels to help resolve employee workplace concerns. When an employee contacts the Global Office of Ombuds, no formal written records are kept and no further action is taken without the employee's permission.

Chevron's Hotline is a formal reporting channel encouraged for use when there is a concern that a law or policy has potentially been violated. The Hotline is also available for use by external stakeholders and is accessible in multiple languages.

Chevron workforce health and safety

Workforce protection is covered through a number of Chevron policies, processes, and practices. Components of the OEMS not mentioned above that contribute to worker safety include:

- Asset integrity standards
- Contractor Health, Environment and Safety Management (CHESM) Process
- Facilities design and construction
- Frontline field supervisor engagement program
- Managing safe work
- Occupational health
- Operating procedures
- Preventing serious incidents and fatalities field guide
- Process safety information
- Process safety organizational capability program
- Risk management processes
- Safeguard verification and validation programs

Diversity, inclusion and nondiscrimination

Chevron has instituted systems, policies, and practices to cultivate a workplace that welcomes different types of people and motivates performance. Diversity strategies, goals and results, which are reviewed annually, are tied to business plans and performance evaluations of managers at various levels and locations of the company. Each Chevron organization reports its progress on diversity annually to our Human Resources Committee. We believe that valuing and promoting diversity helps each one of us to do a better job while leading to better business results.

anticorruption compliance and risk management

Chevron has a strong culture of compliance and has made compliance a priority by devoting substantial effort and resources to its compliance program. Chevron's compliance program has been in place for a number of years and, through active monitoring, has been modified over time in response to changes in the law, enforcement trends, risk profiles, and enhancements in company procedures. Chevron's policy is to fully comply with all applicable laws and to "get results the right way."

A [Business Conduct and Ethics Code \(BC&EC\)](#) has been developed and disseminated to communicate the company's expectations for ethical business conduct. Chevron's BC&EC holds our workforce to the highest standards of business honesty and integrity and encourages employees to report questionable conduct. The Code is made available to all employees in English and 13 other languages. Every board director, employee, and full-time contractor is trained on the Code every two years. The Code is also available on the company's external website as a statement of our business conduct principles and expectations.

The U.S. Sentencing Guidelines and the Organisation for Economic Co-operation and Development's Good Practice Guidance on Internal Controls, Ethics and Compliance establish recognized standards for the elements of an effective compliance program. Chevron's program incorporates these standards. We seek to promote a culture of compliant and ethical behavior, to exercise due diligence to prevent and detect improper conduct, to promote an organizational culture that encourages ethical conduct and a commitment to compliance with the law, and to focus compliance resources on the specific compliance risks facing the company.

The key components of Chevron's compliance program include:

- Support and oversight by senior management - "Tone at the Top"
- Communication of compliance policies and procedures to all employees
- Compliance training for employees
- Anonymous violation reporting without fear of reprisal
- Response to and prevention of violations
- Monitoring and reporting compliance results
- Periodic independent evaluation of the compliance program
- Periodic re-evaluation of the program based on an assessment of compliance risk

Chevron's Board of Directors oversees the company's overall risk management policies and practices. The Public Policy Committee assists the board in fulfilling its oversight of risks that may arise in connection with the social, political, environmental, and public policy aspects of Chevron's business.

The Global Issues Committee (GIC), a subcommittee of Chevron's Executive Committee, identifies emerging global issues of concern including those related to public policy, corporate responsibility, human rights, and reputation management. The GIC directs the development of policies and positions related to global issues of significance and recommends appropriate actions. The Board Audit Committee and Compliance Policy Committee, comprised of the company's senior leadership, establish a strong and visible tone at the top and provide high-level oversight of the Chevron Compliance Program.

All employees are responsible for immediately reporting potential compliance violations to their supervisors or another company resource, and our partners and stakeholders are urged to report violations as well. Some examples of the types of matters Chevron encourages reporting includes:

- Alleged ethics and compliance violations
- Financial reporting and internal control issues
- Environmental, health, and safety issues
- Workplace disputes and misconduct
- Legal and regulatory issues
- Information protection and data privacy issues
- Threat or physical violence

Chevron's anticorruption program

It is Chevron's policy to fully comply with the U.S. Foreign Corrupt Practices Act (FCPA) and all applicable antibribery laws. Chevron has established detailed compliance guidelines that require advance review and approval of certain sensitive transactions involving persons and entities who qualify as a "foreign or non U.S. government official" under the FCPA. Each business unit is expected to establish compliance procedures that are consistent with these overarching corporate guidelines.

Chevron also has established a system of controls which identifies specific types of transactions that are deemed to be sensitive due to the potential involvement of foreign officials. Chevron employs an embedded compliance structure comprised of trained compliance personnel to monitor engagements with foreign officials to ensure adherence to the established compliance controls. In this regard, Chevron's Office of Corporate Compliance and chief compliance officer has delineated certain types of transactions which, based on the scope and level of risk associated with such transactions, are subject to review by headquarters or Corporate Compliance or both. These include, for example, expenditures for travel, meals,

entertainment, and gifts for the benefit of foreign officials as well as the retention of third-party agents or consultants. Conversely, certain types of low-value expenditures such as business meeting expenses are delegated to compliance personnel embedded at the operational location for their review and approval. Chevron counsel in the local operational jurisdictions, as well as a team of antibribery law subject matter experts located at Chevron's headquarters, are involved in this process.

All Chevron operational locations are expected to adhere to the aforementioned controls for sensitive transactions. Sensitive transactions undertaken by Chevron's Myanmar office, which has a limited number of personnel, are subject to review and approval by Chevron's regional office in Thailand. Depending upon the type and scope of transactions, this review and approval may have to be elevated to the Chevron headquarters providing oversight of the Myanmar operations or to Corporate Compliance.

As part of Chevron's due diligence requirement for third-party engagements, new block acquisitions such as the acquisition of UMOL's interest in Block A5, are required to undergo more enhanced pre-acquisition due diligence. All such due diligence is undertaken under the guidance and oversight of Chevron counsel and, as appropriate, Chevron compliance counsel. With regard to UMOL's Myanmar operations and the acquisition of interest in Block A5, all such due diligence was coordinated and managed by Chevron compliance counsel at headquarters with input from Chevron counsel in Thailand.

Chevron is committed to ensuring that our contractors also adhere to our compliance standards. It is a standard practice that our agreements with third-party vendors and contractors include compliance clauses which require, among other things, a commitment to comply with local antibribery laws and the FCPA as well as applicable trade sanctions laws. Our contracts may also reserve the right for Chevron to audit contracting companies.

environmental stewardship



Dock on Gwa River.

Our Environmental Stewardship Corporate Standard Process is our standardized approach to identify and manage potential impacts, mitigate risks, and strive to continually improve environmental performance. This companywide, disciplined approach helps us to identify and manage potential impacts our operations may have, such as those related to waste disposal, air emissions and water use.

As detailed in *The Chevron Way*, protecting people and the environment is one of our company's core values. In support of these values, we have four environmental principles that define our commitment to conducting business in a responsible way. They are:

1. Include the environment in decision making.
2. Reduce our environmental footprint by managing risks to the environment and reducing potential environmental impacts throughout the life of our assets.
3. Operate responsibly through the application of our Tenets of Operation and improve reliability and process safety in order to prevent accidental releases.
4. Steward our sites by working to decommission, remediate and reclaim operating and legacy sites with the aim of beneficial reuse.

ESHIA

ESHIA is applied to capital projects under Chevron's operational control. It provides a systematic and risk-based approach to identifying, assessing, and managing potential impacts related to our business.

The assessments can include potentially significant impacts of our activities on natural resources, air quality, land and water, and community health and livelihoods, among other things. Obtaining input from communities and partners is an important component of the ESHIA process.

Biodiversity

We recognize the importance of conserving biological diversity—the rich variety of life on Earth, including ecosystems and species as well as the ecological processes that support them. Our OEMS includes processes and tools for managing potentially significant environmental impacts, including on biodiversity. Chevron's Biodiversity Statement expresses our goal of incorporating biodiversity

considerations into capital project evaluations and operational decision making as part of our corporate Environmental Stewardship and ESHIA processes.

Through the ESHIA process, we conduct a baseline assessment of existing environmental conditions, such as the presence of sensitive habitats or fishing grounds, to inform our understanding of potential impacts. The assessment results are incorporated into project planning to help us avoid potentially significant impacts and protect sensitive environments.

In addition, our business units and operating companies incorporate biodiversity protection into their operations through implementation of our corporate Environmental Stewardship process. Our Health, Environment and Safety (HES) staffs work to protect habitats near our operations and share their best practices through the Chevron Biodiversity Network.

Chevron's global fresh water position statement

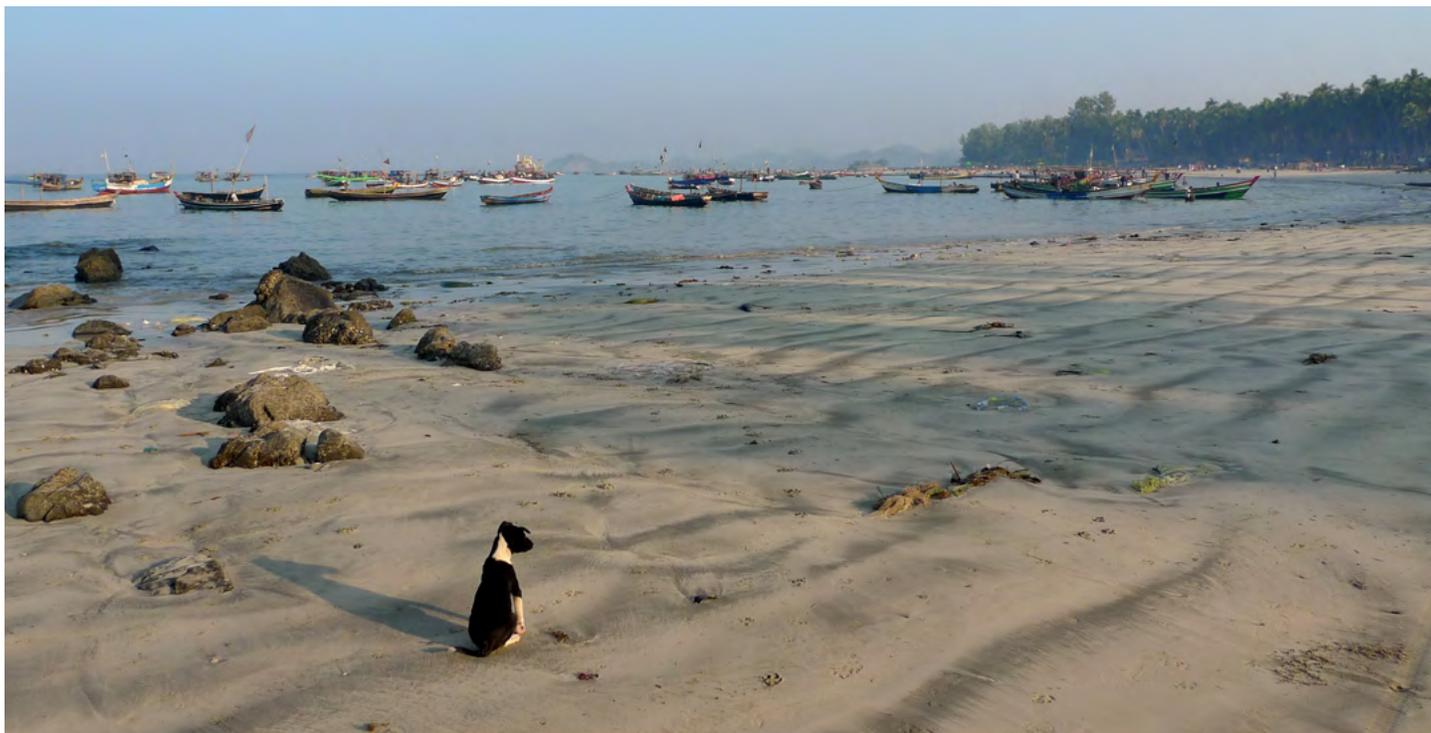
Chevron recognizes that water, and particularly fresh water, is a critical resource for business, communities, and the environment. Our Global Freshwater Position Statement

underscores the significance of this critical resource. The statement articulates our commitment to responsible management of freshwater resources.

Chevron's corporate initiatives for water risk management and reporting practices focus on corporate, regional and local water risk identification and management through the use of water-mapping tools. Our corporate water metric tracks data on withdrawn fresh water, the amount of fresh water returned to fresh water resources, and recycled water for onsite use. This initiative includes risk assessment and management of fresh and other water sources as well as beneficial reuse of wastewater streams through the life cycle of our assets.

Contractor safety management

Chevron is committed to holding our contractors to high OE standards. Chevron has a process to integrate OE criteria into the selection of contractors, establish accountability, and provide active engagement of contractors. Chevron's CHESM process helps ensure our contractors meet HES standards. Company contract owners are assigned for each contract. CHESM also includes a contractor qualification, selection, and evaluation process.



Fishing boats docked at Gyeik Daw.

arrangements with security service providers

Security services

As a founding member of the Voluntary Principles on Security and Human Rights (VPs), Chevron has played a leadership role in responsible security organizations and in practice for more than a decade.

Chevron's Human Rights Policy explains our relationship to the Voluntary Principles:

"We protect personnel and assets and provide a secure environment in which business operations may be successfully conducted. Our guidelines and management processes on security in our areas of operations are consistent with the Voluntary Principles on Security and Human Rights, which covers:

- Interaction with private security providers, including (i) due diligence of potential new security providers; (ii) monitoring of equipment and facilities to prevent misuse; (iii) engagement with communities on security issues; (iv) facilitating education and training on the Principles.
- Interaction with public security providers, including (i) security arrangements; (ii) deployment and conduct; (iii) consultation and advice; and (iv) responses to human rights-related issues.
- Conducting assessments of security and human rights-related issues in areas of operations.
- Reporting security and human rights-related incidents involving public or private security personnel to Company management, and to appropriate Government authorities in cases involving public security personnel."

Chevron's Corporate Policy on Security of Personnel and Assets (SP&A) is complemented by the OEMS, which has as its first element a process with the same name. The SP&A Process provides a comprehensive framework to identify and mitigate security-related risk. This process explains the link between security and human rights and establishes guidelines and safeguards to help Chevron conduct security operations in compliance with our Human Rights Policy and applicable national and international law. Highlights of the process are as follows.

OEMS: Security of personnel and assets

Provide a physical and cyber security environment in which business operations may be successfully conducted.

- A process is in place to actively engage the workforce in security awareness and vigilance to the security environment.
- Risk-based security management plans are developed, implemented and maintained to address potential security threats to the business.
- A process is in place to integrate security management plans with related plans for emergency management, business continuity and information protection.

A key aspect of Chevron's security process is the Security Risk Assessment Program, which includes an assessment guidance tool to help business units identify, assess and manage potential security and human rights-related issues. This assessment considers matters related to community grievances, violence and conflict, security forces and equipment transfer, among others. Issues assessments are conducted prior to the commencement of a major new project or entry into sensitive operating environments.

Chevron requires reporting of security and human rights-related incidents to Chevron's Global Security group and other human rights concerns to the Public Policy and Corporate Responsibility group. For both internal and external stakeholders, Chevron offers a global 24-hour hotline as mentioned earlier. Chevron encourages both employees and contractors to utilize the Hotline to report complaints via phone, Internet, or email.

Chevron's standard security services contracts incorporate clauses that reflect our commitment to the Voluntary Principles. In particular, our contractual terms set forth expectations regarding training on the Voluntary Principles, background screening of contract personnel and investigation of allegations of security and human rights-related incidents. Our contracts also reserve the right for Chevron to audit contracting companies to determine if they adhere to these and other requirements.

Security Management Review (SMR) is another process that Chevron uses to review and assess how business units are implementing security practices. The Voluntary Principles Security and Human Rights are one of several issues assessed through this process. The Corporate SMR program was amended in 2015 to incorporate an increased human rights focus on countries with elevated human rights risk potential as determined through annual corporate and local reviews.

Myanmar security services

UMOL has engaged Exera Limited (Exera), a security services company from the United Kingdom with principal offices in the Mayangone Township in Myanmar to provide security guard services, residential security survey, Rakhine State risk assessment, Active Risk Management security reporting, and emergency call-out services. The security services selection process included obtaining advice on suitable security service providers from the U.S. Embassy in Myanmar.

Exera has provided written confirmation to UMOL that it subscribes fully to the International Code of Conduct Association for Private Security Service Providers (ICoCA) and the Voluntary Principles on Security and Human Rights per their company policies, but that it has not paid to join the ICoCA. Exera has further noted that since there are no national-level certification authorities for private security providers in Myanmar, they utilize the U.K. Security Industry Authority standards wherever appropriate.

Chevron Security monitors and provides oversight of Exera activities via monthly meetings between the Exera Operations Manager and in-country UMOL staff. Regular meetings are held either in Myanmar or Thailand between the Exera senior management and the UMOL president and country manager, Global Security advisor, and as appropriate, Chevron Thailand's general manager and Chevron's local counsel and Policy, Government and Public Affairs representatives.

property acquisition

UMOL's exploration interests in Myanmar are managed from a leased space in Yangon. In addition, UMOL has entered into a local residential lease through June 2016 which is expected to be extended. Prior to the execution of each of these lease agreements, UMOL conducted due diligence on the property owners under the direction of Chevron counsel.

With regard to land acquisition, Block A5 is offshore and UMOL is in the early stages of the exploration process. Thus, there are no land or property acquisitions to report nor any issues associated with our activity at this time outside the 2014 A5 block granting process. However, Chevron does have various processes, procedures and guidelines on land issues, the most relevant of which are specified as follows.

Land use and resettlement

We respect property rights wherever we operate. Chevron's Human Rights Policy sets the expectation that the company will avoid relocation or resettlement whenever possible. When resettlement is unavoidable, our Resettlement Guidance advises that business units should strive to work collaboratively and transparently with local communities, including indigenous peoples, in a way that fosters ongoing support for our activities. Our policies, procedures, and guidance are consistent with relevant external guidelines, including the International Finance Corporation's Performance Standards on Environmental and Social Sustainability.

Chevron also benefits from internal "communities of practice" networks of experienced social performance and ESHIA practitioners. For example, Chevron convenes workshops for company practitioners who are involved in managing land issues related to resettlement. In the workshops, Chevron practitioners discuss how the company's expectations on human rights extend to resettlement issues, discuss relevant international standards, and share lessons learned from their practical experiences.

transparency

Chevron has a long-term commitment to revenue transparency as evidenced by the fact that a company representative has held a seat on the Extractive Industries Transparency Initiative (EITI) Global Board since its inception in 2003. EITI is a global standard to promote open and accountable management of natural resources. It seeks to strengthen government and company systems, inform public debates, and enhance trust. In each implementing country it is supported by a coalition of governments, companies, and civil society organizations working together to publicly reconcile company payments and government revenues. Chevron currently operates or has a nonoperated working interest in 17 of the 51 EITI-implementing countries.

Myanmar joined EITI upon instructions from its president at the end of 2012. Myanmar submitted its application to become an EITI Candidate country to the EITI Board in May 2014. At its 27th meeting in Mexico in early July 2014, the EITI Board approved Myanmar's candidacy application and granted Myanmar until January 2016 to produce its first EITI report. Myanmar has until January 2017 to meet all seven EITI requirements in order to gain EITI Compliant status.

In February 2014, a multistakeholder group (MSG) was formed to oversee EITI implementation in Myanmar. The MSG comprises 21 representatives from government, civil society organizations, and the private sector. Three subcommittees have also been established to take forward the work on reporting, outreach and communications, work plan management, and governance. The first Myanmar EITI Report was released in December 2015 and covers the period from April 2013 through March 2014. This report can be found at EITI.org.

On May 22, 2015, UMOL remitted US\$150,000 to MOGE as payment for the data fee that is required under the production-sharing contract. There have been no other payments to a Government of Myanmar entity, subnational or administrative governmental entity or nonstate group that possesses or claims to possess governmental authority over UMOL's new investment activities in Myanmar.

UMOL disbursements for the referenced environmental, social and health impact assessment studies were paid to a private third-party service provider. Similarly, disbursements for the seismic acquisition services, as well as payments in support of in-country social investment and community engagement projects were all paid to private third parties.



Chevron Corporation

6001 Bollinger Canyon Road, San Ramon, CA 94583-2324

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