

# EXTRACTIVE INDUSTRIES TRANSPARENCY INITIATIVE

EITI MYANMAR

PREFINAL EITI REPORT 2017-2018



This report has been prepared at the request of the Multi-Stakeholder Group (MSG) in charge with the implementation of the Extractive Industries Transparency Initiative in Myanmar (MEITI). The opinion expressed in the report are those of the Independent Administrator and did not reflect the official opinion of the MEITI-MSG. This report has been prepared exclusively for use by EITI Myanmar and must not be used by other parties, nor for any purposes other than those for which it is intended.

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Glossary and abbreviations	
ADB	Asian Development Bank
AGM	Annual General Meeting
AGO	Attorney General Office
ASM	Artisanal and Small-scale mining
ATL	Andaman Transportation Limited
Bbl.	Barrel
BCF	Billions of Cubic Feet
BO	Beneficial Ownership
BOPD	Barrel Oil Per Day
BPSD	Barrel Per Stream Day
Bscf	Billion Scf
CBM	Central Bank of Myanmar
CD	Customs Duties
CGT	Capital Gains Tax
CIF	Cost, insurance and freight
CIT	Corporate Income Tax
CNG	Compressed Natural Gas
CNPC	China National Petroleum Corporation
CNUOC	China National United Oil Corporation
CSO	Central Statistical Organization
CSO	Civil Society Organisation
CSR	Corporate Social Responsibility
CT	Commercial Tax
DEPP	Department of Electric Power and Planning
DGSE	Department of Geological Service and Mineral Exploration
DHPI	Department of Hydropower Implementation
DHPP	Department of Hydropower Planning
DICA	Directorate of Investment and Company Administration
DOM	Department of Mines
DPP	Directorate of Defence Procurement
DPTSC	Department of Power Transmission and System Control
EGSA	Export Gas Sales Agreement
EGTA	Export Gas Transportation Agreement
EIA	Environmental Impact Assessment
EITI	Extractive Industries Transparency Initiative
EMP	Environmental Management Plan
E&P	Exploration and production
EPD	Energy Planning Department
EPGE	Electric Power Generation Enterprise
EQEG	Environmental Quality Emission Guideline
ERT	Electro Refined Tin
ESE	Electricity Supply Enterprise
EUR	Euro
FDI	Foreign Direct Investment
FDP	Field Development Plan

## Glossary and abbreviations

FIL	Foreign Investment Law
FOB	Free on Board
FS	Financial Statements
FY	Fiscal Year
G&G	Geological and Geophysical Study
GAAP	Generally Accepted Accounting Principles
GAD	General Administration Department
GDP	Gross Domestic Product
GEG	Gas Engine Driven Generating Set
GJOC	Gold Petrol Joint Operating Company
GOUM	The Government of the Republic of the Union of Myanmar
GPOA	Gas Pipeline Operating Agreement
IA	Independent Administrator
IASB	International Accounting Standards Board
IEE	Initial Environmental Examination
IFAC	International Federation of Accountants
IFC	International Finance Corporation
IFRS	International Financial Reporting Standards
INTOSAI	International Organisation of Supreme Audit Institutions
IOC	International Oil Company
IPRC	Improved Petroleum Recovery Contracts
IPSAS	International Public Sector Accounting Standards
IRD	Internal Revenue Department
ISRS	International Standards for Related Services
IT	Income Tax
JV	Joint Venture
JV(A)	Joint Venture (Agreement)
Kg	Kilograms
km <sup>2</sup>	Square kilometer
LME	London Metal Exchange
LoEI	Letter of Expression of Interest
LPG	Liquid Petroleum Gas
LTO	Large Taxpayer Office
MAC	Myanmar Accountancy Council
MACCS	Myanmar Automated Cargo Clearance System
MAS	Myanmar Accounting Standards
MATA	Myanmar Alliance for Transparency and Accountability
MCA	Myanmar Companies Act
MCD	Myanmar Customs Department
MCL	Myanmar Companies Law
ME	Mining Enterprise
ME 1	No.1 Mining Enterprise
ME 2	No.2 Mining Enterprise
MEB	Myanma Economic Bank
MEC	Myanmar Economic Corporation

Glossary and abbreviations	
MEHL	Myanmar Economic Holding Limited
MEHPCL	Myanmar Economics Holding Public Company Limited
MEITI	Myanmar Extractive Industries Transparency Initiative
MEPE	Myanmar Electric Power Enterprise
MESC	Mandalay Electricity Supply Corporation
MFMA	Myanmar Federation of Mining Associations
MFPMF	Myanmar Forest Products Merchant Federation
MFRS	Myanmar Financial Reporting Standards
MFTB	Myanmar Foreign Trade Bank
MGE	Myanmar Gems Enterprise
MGEDLC	Myanmar Gems Enterprises Development Leading Committee
MGJEA	Myanmar Gems and Jewellery Entrepreneurs Association
MGTC	Moattama Gas Transportation Co. Ltd
MIC	Myanmar Investment Commission
MICCL	Myanmar Ivanhoe Copper Company Ltd
MICPA	Myanmar Institute of Certified Accountants
MIL	Myanmar Investment Law
MMCFD	Million Cubic Feet per Day
MMK	Myanmar Kyats
Mscf	Million scf
MNPED	Ministry of National Planning and Economic Development
MNRMC	Minerals and Natural Resources Management Committee
MOBD	Myanmar office of Budget Department
MOE	Ministry of Energy
MOECAF	Ministry of Environmental Conservation and Forestry
MOEE	Ministry of Energy and Electricity
MOEP	Ministry of Electric Power
MOGE	Myanmar Oil and Gas Enterprise
MOM	Ministry of Mines
MONREC	Ministry of Natural Resource and Environmental Conservation
MoPF	Ministry of Planning and Finance
MoU	Memorandum of Understanding
MPE	Myanmar Pearl Enterprise
MPE	Myanmar Petrochemical Enterprise
MPPE	Myanmar Petroleum Product Enterprise
MSA	Myanmar Standards on Auditing
Mscf	Thousand scf
MSDP	Myanmar sustainable development plan
MSG	Multi-Stakeholder Group
MSMCE	Myanmar Salt and Marine Chemical Enterprise
MT	Metric Tons
MTFF	Medium Term Fiscal Framework
MTO	Medium Taxpayer Offices
n/a	Not applicable
n/c	Not communicated

## Glossary and abbreviations

NCS	National Coordination Secretariat
NECC	National Economics Coordination Committee
NEPAS	National Energy Puma Aviation Services
NRGI	Natural Resource Governance Institute
OA	Other Accounts
OAG	Office of the Auditor General of the Union
OAS	Official Assessment System
OECD	Organisation for Economic Co-operation and Development
OGPD	Oil and Gas Planning Department
OPTR	Operator
Oz T	troy ounce
PAC	Public Accounts Committee
PCC	Performance Compensation Contract
PEP	Political exposed persons
PFM	Public Finance Management
PIT	Personal Income Tax
PRT	Pyro Refine Tin
PSC	Production Sharing Contract
PTT	Petroleum Authority of Thailand
PTTEP	Petroleum Authority of Thailand Exploration and Production
PTTEPO	PTTEP Offshore Investment Limited
R&D	Research and Development
SAD	Self-assessment System
scf	Cubic Feet
SEAGP	South East Asia Gas Pipeline
SEAOP	Southeast Asia Crude Oil Pipeline
SEE	State Economic Enterprise
SEP	Socio-Economic Programme
SEZ	Special Economic Zone
SGT	Specific Goods Tax
SIA	Social Impact Assessment
SME	Small and Medium-sized Enterprise
SOE	State-Owned Enterprise
SSB	Social Security Board
Tcf	Trillion Cubic Feet
THB	Thai Baht
TIN	Tax Identification Number
ToR	Terms of Reference
Toz	Troy ounce
TPC	Taninthayi Pipeline Company LLC
Tscf	Trillion Cubic Feet
UFA	Union Fund Account
UMEHL	Union of Myanmar Economic Holdings Ltd
UMO	Union Minister Office
UNCITRAL	United Nations Commission on International Trade Law



Glossary and abbreviations	
US \$-USD	United States dollars
UTL	Union Taxation Law
WHT	Withholding Tax
YESC	Yangon Electricity Supply Corporation

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# INTRODUCTION

## Extractive Industries Transparency Initiative (EITI) <sup>1</sup>

The Extractive Industries Transparency Initiative (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 organisations working together.

The Extractive Industries Transparency Initiative (EITI) was first announced at the World Summit on Sustainable Development in Johannesburg in 2002 (the Earth Summit 2002) and was officially launched in London in 2003. EITI is currently being implemented in 53 countries in Africa, Asia, Europe and America.

The EITI Standard sets out of the requirements which countries need to meet in order to be recognised, first as EITI Candidates and subsequently as EITI Compliant country. The Standard is overseen by the International EITI Secretariat, with which comprises members from governments, extractive companies and civil society organisations.

## EITI in Myanmar

Myanmar joined EITI on 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 July 2014, the EITI Board approved Myanmar's candidacy application, and granted Myanmar until January 2016 to produce its first EITI Report.

In December 2015, Myanmar published its first EITI report for the period starting from April 2013 to March 2014.

On the 19<sup>th</sup> of December 2016, the Union Government formally appointed the Myanmar EITI Leading Committee, composed of the Minister of Planning and Finance (MOPF) as Chair, the Minister of Natural Resources and Conservation and the Minister of Energy and Electricity as members, and the Deputy Minister of MOPF as Secretary. The Renaissance Institute was appointed as the National Coordination Office. Civil society is represented by nine members of the Myanmar Alliance for Transparency and Accountability (MATA), while industry is represented by members of the Myanmar Federation of Mining Associations (MFMA) and oil and gas companies. The government has seven representatives.

On 7 March 2017, the EITI International Board approved MEITI's request for extension of deadlines, setting 31 March 2018 as the deadline for the publication of the second EITI Report, and 1 July 2018 as the commencement date for their Validation.

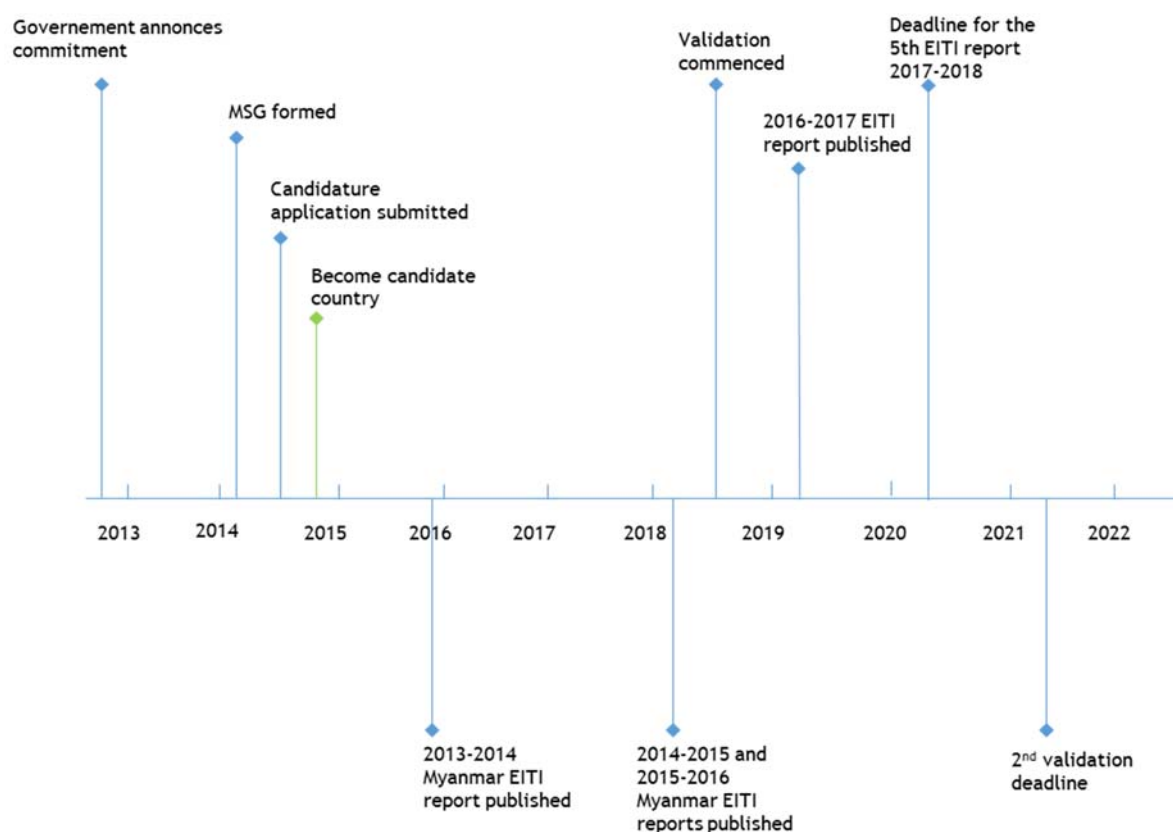
The timeline for Myanmar EITI process can be presented as follows:<sup>2</sup>

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<sup>1</sup> Source: <https://eiti.org/eiti>

<sup>2</sup> [https://eiti.org/sites/default/files/inline/timeline\\_myanmar\\_0.png](https://eiti.org/sites/default/files/inline/timeline_myanmar_0.png)

Chart 1 : Myanmar EITI process timeline



Myanmar's Validation against the Standard commenced on 1 July 2018. On the 16<sup>th</sup> of October 2019, the EITI Board recognised Myanmar to have made meaningful progress in implementing the EITI Standard.

Taking into account<sup>3</sup> the complexity of the extractive sector in the country and the good faith efforts undertaken by Myanmar to meet requirements of the EITI Standard, the Board has determined that Myanmar will have 18 months, i.e. until 16 April 2021, before a second Validation to carry out corrective actions.

The follow up of the corrective actions requested by this validation is presented in the annex 13.

The ongoing initiatives and other reform processes related to the EITI process are presented in the validation report<sup>4</sup>.

## Objective

The purpose of this Report is to reconcile the data provided by companies operating in the extractive sector (hereafter referred to as “Companies”) with the data provided by relevant Government Ministries and Bodies (hereinafter referred to as “Government Agencies”).

The overall objectives of the reconciliation exercise are to assist the Government of Myanmar in identifying the positive contribution that extractive sector makes to the economic and social development of the country and to realise their potential through improved resource governance that encompasses and fully implements the principles and criteria of the Extractive Industries Transparency Initiative.

<sup>3</sup> <https://eiti.org/board-decision/2019-58>

<sup>4</sup> <https://eiti.org/scorecard-pdf?filter%5Bcountry%5D=54&filter%5Byear%5D=2018>



According to MSG's decision, the extractive sectors to be covered by this report are oil and gas, gems and jade, other minerals and pearls.

## Nature and extent of our work

We have performed our work in accordance with the International Auditing Standards applicable to related services (ISRS 4400 Engagements to perform agreed upon procedures regarding Financial Information). The procedures performed were those set out in the terms of reference as set out in the Request for Proposal and approved by MSG.

The reconciliation procedures carried out were not designed to constitute an audit or review in accordance with International Standards on Auditing or International Standards on Review Engagements and as a result, we do not express any assurance on the transactions beyond the explicit statements set out in this report.

The report consists of seven (7) chapters presented as follows:

- Executive summary;
- Approach and methodology;
- Contextual information on the extractive sector;
- Determination of the reconciliation scope;
- Reconciliation results;
- Other information; and
- Findings, recommendations.

Reported data disaggregated by individual companies, Government Agencies and revenue streams, are included as Appendices to the report. The amounts in this report are stated in Myanmar Kyat (MMK), unless otherwise stated.

Our report incorporates information received up to 8 February 2020. Any information received after this date has not been included in the report.

# 1. EXECUTIVE SUMMARY

This report summarises information about the reconciliation of fiscal and non-fiscal revenues from the extractive sector in Myanmar as part of the implementation of the Extractive Industries Transparency Initiative (EITI). In addition, this report includes the reconciliation of revenues collected by State-Owned Enterprises (SOEs) from extractive companies and cash flows contributed by SOEs to the State's budget.

As agreed by MSG during their 25<sup>th</sup> meeting, the extractive sector covered by the present reconciliation includes three sub-sectors Oil and Gas, Gems and Jade, other minerals and pearls.

## 1.1. Limitations to the scope of work

### General limitations

- This report covers the mining sector and the upstream and midstream Oil and gas sector, the downstream sector will be subject to the first Commodity trading report to be published after this report.
- According to the MSG decision, the B.O information gathering was performed according to another process, the main conclusion of this process is presented in the section 3.7 of this report.

### Limitations regarding the information related to the mining sector

- We have not been able to include in this report the unilateral disclosure detailed per company related to the MGE payments. This information wasn't reported by the MGE.
- We have not received the unilateral disclosure reporting template of the MGE certified by the OAG.
- We have not been able to reconcile the pearl exports and production because the MPE did not report the information detailed by individual companies with the exact name of the companies as agreed by the MSG during the scoping study. The information provided by the MPE was reported as below :

Description	Local Sale					Export			
	Lot	Pcs	Momme	US \$	Euro	Lot	Pcs	Momme	US \$
USA Las Vegas						40	2,422	2,030	816,002
6 <sup>th</sup> HK						267	50,122	37,279	6,196,539
MPA Aug 2017	209	59,427	45,705	2,165,110	1,860,521	61	27,487	19,297	489,222
TSK 18th Har (75%)							174,114	120,526	6,050,115
ALT 29th Har (75%)							45,655	26,213	846,312
ADM 26th Har (75%)							66,086	35,423	1,722,426
BPM 1st (75%)							8,683	5,560	201,446
OPC (OGL)							145,025	82,691	3,673,705
NN (OGL)							34,322	24,796	1,074,893
<b>Total</b>	<b>209</b>	<b>59,427</b>	<b>45,705</b>	<b>2,165,110</b>	<b>1,860,521</b>	<b>368</b>	<b>553,916</b>	<b>353,816</b>	<b>21,070,660</b>

## 1.2. Revenue generated from the extractive sector

The receipts reported by the Government Agencies during the period from 1 April 2017 to 31 March 2018, after reconciliation, are summarised as follows:

### REVENUES OF THE EXTRACTIVE COMPANIES

Total revenue collected from the extractive companies amounted to MMK 1,935,945 million<sup>5</sup> for the fiscal year 2017-2018. The revenue stream from the extractive sector is made up of 72.19% of revenues from the Oil and Gas sub-sector (including Oil and Gas transportation) while mining sector represent 27.81%. Details of these revenues streams is set out in the table below:

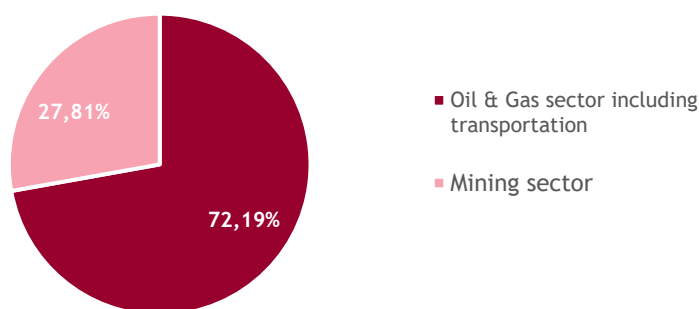
Table 1: Total revenue collected

Figures in million MMK

Sub-sector	Total revenues collected	Social payments	Total revenues	%
Oil & Gas sector including transportation	1,386,959	10,508	1,397,467	72.19%
Mining sector	528,759	9,720	538,479	27.81%
<b>Total</b>	<b>1,915,717</b>	<b>20,228</b>	<b>1,935,945</b>	<b>100%</b>

Source : EITI data

Chart 2 : Breakdown of extractive revenue



#### Revenue of the oil and gas sub-sector:

##### Revenue in cash:

According to the data reported by Government Agencies and SOEs, details of the oil and gas revenues after adjustments including the transportation sector can be detailed below:

Table 2: Total revenue per subsector

Figures in MMK million

Sub-sector	Total revenues collected	Social payments	Total revenues	%
Revenue collected from Oil and gas companies	985,714	5,947	991,661	71%
Oil & Gas transportation	401,245	4,561	405,806	29%
<b>Total</b>	<b>1,386,959</b>	<b>10,508</b>	<b>1,397,467</b>	<b>100%</b>

Source : EITI data

<sup>5</sup> Source: EITI Data reported by Government Agencies after adjustments

Revenues collected from oil and gas companies amounted to 985,714 mill MMK are net revenues after payments from MOGE to the oil and companies are deducted. The deductions include purchase of domestic gas offshore and purchase of the companies' share of oil/gas onshore.

#### Revenue in kind:

The oil and gas revenues in kind detailed by payment flows are as follows:

**Table 3 : Total revenue in kind**

Type of in-kind payment	Oil collection in barrels	Gas collection in Mscf
Baseline payments	613,272	616
Cost recovery	316,992	61
State profit share	73,585	
Royalties payments	43,451	
Risk compensation	38,409	29
<b>Total</b>	<b>1,085,709</b>	<b>707</b>

Source : EITI data

#### Oil and Gas revenue detailed per type of permit :

According to the data reported by MOGE after adjustments, the Oil and Gas revenue detailed per type of permit is presented as follows:

**Table 4 : Total revenue per type of permit**

*Figures in MMK million*

Type of permits	PSC contracts			PCC contracts			IPR contracts		
	in Million MMK	in bbl	in Mscf	in Million MMK	in bbl	in Mscf	in Million MMK	in bbl	in Mscf
Total production		1,603,783	649,704		487,490	706.854		829,549	-
Total revenue in kind					487,490	706.854		598,219	
Equivalent in cash				36,652 <sup>6</sup>			44,476		
Revenue collected in cash	924,243			(14,675)			(17,010)		
<b>Total revenue</b>	<b>924,243</b>			<b>21,977</b>			<b>27,466</b>		

Source : EITI data

Following this analysis, we can confirm that the PSC generated more revenues for the extractive sector compared to the two other types of contract even after matching the revenues generated to the quantities produced by the different types of permits.

#### Revenue of the mining sub-sector:

According to the data reported by Government Agencies and SOE's, details of the mining sub-sector revenues after adjustments including the Gems and Jade, Pearl and other minerals is as follows:

**Table 5: Total mining revenue per subsector**

*Figures in MMK million*

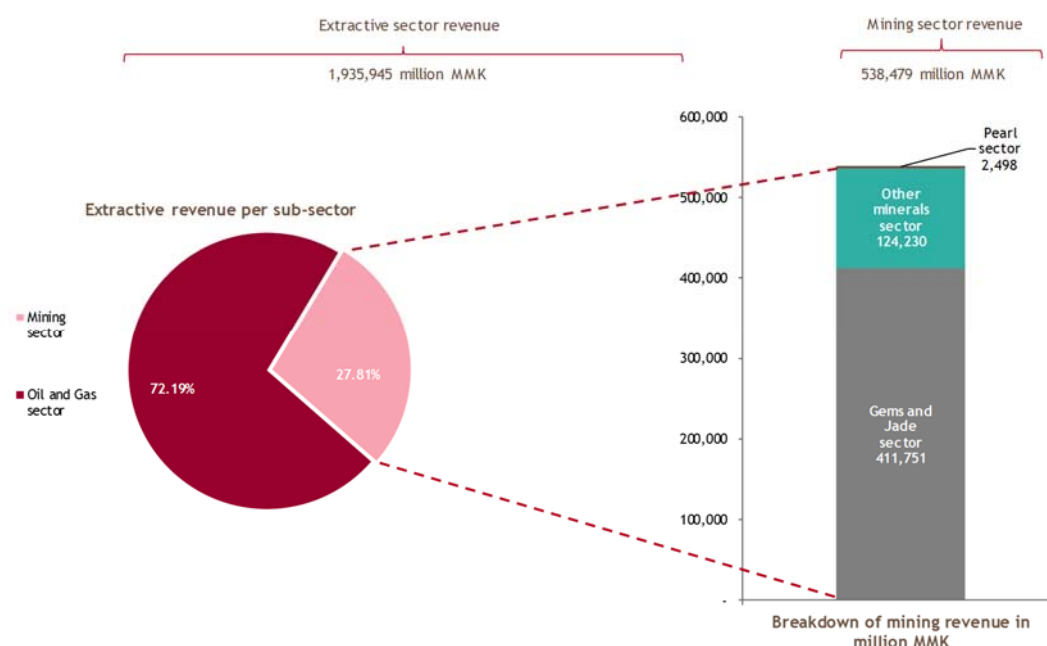
Sub-sector	Total revenues collected	Social payments	Unilateral disclosure	Total revenues	%
Revenue collected from Gems and Jade companies	349,264	381	62,106	411,751	76%
Payments performed by other minerals companies	110,733	8,695	4,802	124,230	23%
Revenue collected from pearl companies	1,853	644	-	2,498	0%
<b>Total</b>	<b>461,850</b>	<b>9,720</b>	<b>66,908</b>	<b>538,479</b>	<b>100%</b>

Source: EITI data

<sup>6</sup> The equivalent of revenue in cash is calculated by multiplying the unit production value by the total in kind revenue collected

The diagram below shows the breakdown of the mining sector by sub-sector:

**Chart 3: Breakdown of mining revenue per sub-sector**



EITI figures indicate that in fiscal year 2017/18, the mining sector represented 27.81% of the total extractive revenue. The main part came from the Gems and Jade sub-sector with more than 411 billion MMK followed by the other minerals sub-sector with 124 billion MMK.

#### Revenue breakdown by collecting entity (Government Agency or SOE):

Details of the extractive revenue presented by collecting entity is set out in the table below<sup>7</sup>.

The figures reported are presented after reconciliation and include payments made by SOEs.

**Table 6: Total revenue per collecting entity**

*Figures in MMK million*

Collection entity	Oil and Gas companies	Oil and gas transport.	Pearl sector	Gems and Jade	Other minerals	Total	%
State Owned Enterprises (SOE's)	937,012	208,375	45	376,157	17,742	1,539,331	79.51%
Internal Revenue Department (IRD)	48,510	184,682	1,067	32,488	87,296	354,045	18.29%
Myanmar Customs Department (MCD)	191	3,628	39	2,725	4,692	11,276	0.58%
Department of Mines (DOM)	-	-	702	-	5,390	6,092	0.31%
Department of Trading (DoT)	-	4,559	-	-	-	4559	0.24%
Forest Department (FD)	-	-	-	-	410	410	0.02%
Department of Geological Survey and Mining Exploration (DGSE)	-	-	-	-	5	5	0.00%
Social payments	5,948	4,561	644	380	8,695	20,228	1.04%
<b>Total</b>	<b>991,661</b>	<b>405,805</b>	<b>2,498</b>	<b>411,751</b>	<b>124,230</b>	<b>1,935,945</b>	<b>100.00%</b>

Source: government data

<sup>7</sup> Source: EITI data reported by Government Agencies after reconciliation adjustments

We can conclude that more than half of extractive revenues is collected by SOEs. The second entity includes the Ministry of Planning and Finances through IRD and MCD. Social payments represent 5% of the total extractive revenues.

The payments made by the extractive companies to the SOEs include non-tax revenues (signature and production bonuses, royalties on sales, royalties on production, production split, sale split, licence fees, data fees).

The payments made by the extractive companies to IRD include Income Tax, Commercial Tax, withholding tax and stamp duties while the payments to the Customs Department include the customs duties and Commercial Tax and Specific Good Tax which will be transferred to IRD.

The payments to DoM include royalties, signature bonuses/application fees, dead rent fees and licence fees while the payments to the Forestry Department include land rental fees and environmental / plantation fees.

The revenues received from the extractive sector disaggregated by revenue streams and by company are presented in Section 5 of the report. The reconciliation sheets by company are presented in annex 12 of the report.

### Significance to Myanmar economy

According to the Central Statistical Organization (CSO), the Gross Domestic Product (GDP) contribution from the extractive sector for 2017-2018 amounted to approximately MMK 4,324,810<sup>8</sup> million or 4.78% of the Country's GDP.

The extractive sector's contribution to the State's revenue amounted to MMK 383,330 million (5.16%)<sup>9</sup> in 2017-2018 (Total revenues of the Union amounting to MMK 7,423,520 million<sup>10</sup>).

As per the Central Statistical Organization, the value of exports from the extractive sector amounted to US\$ 5,271.5 million and represents about 35.5% of the country's total export of <sup>11</sup> US\$ 14,850.7 million.

From the data collected from companies, SOEs and Government Agencies, the extractive sector employment represented 0.25% of the country's 2017-2018 total labour force in Myanmar.

The charts below show the contribution from the extractive sector to GDP, the State's revenues and the exports figures for 2017-2018. More details are set out in Section 6.6 of this report.

Chart 5: Macro-economic indicators for the extractive sector (2017-2018)



## 1.3. Production and exports

### Oil and Gas

According to data reported by MOGE, 1,603,783 barrels of condensate and 649,704 Mscf of Natural Gas were produced in offshore blocks and 1,317,039 barrels of Oil and 706.853 Mscf of Natural Gas were produced in onshore blocks during the year from April 2017 to March 2018.

8 Central Statistical Organization  
9 Central Statistical Organization  
10 Central Statistical Organization  
11 Central Statistical Organization

The value of oil and natural gas exported amounted to MMK 144,719 million and MMK 4,065,380 million respectively according to data made available by MOGE.

**Table 9 : Oil and Gas production and exports**

		Production			Exportation		
		Volume	Unit	Value (in million MMK)	Volume	Unit	Value (in million MMK)
Offshore blocks	Condensate	1,603,783	Barrels	127,190	1,824,806	Barrels	144,719
	Gas	649,704	Mscf	5,153,8425(*)	512,490	Mscf	4,065,380
Onshore blocks	Oil	1,317,039	Barrels	96,742	-	-	-
	Gas	707	Mscf	1,584	-	-	-
Total				5,379,358			4,210,099

(\*)Value calculated based on the exportation price

### Gems and jade

According to data reported by MGE, 6,949,331 carats, 4.9 tons of gems were produced in 2017-2018 as follows:

**Table 10: Gems production**

Mineral Type	Sharing / Private	Unit	Production Volume	Production Value Million Kyat
Gems	Scope	Carat	599,119	145.96
		Kilo	33	
	Out of Scope	Carat	6,350,211	1,437.6
		Kilo	4,882	
Total Gems Production		Carat	6,949,331	1,583.6
		Kilo	4,914	

Source: MGE data

Additionally, 31,677.7 tons of jade were produced in 2017-2018 as follows for a total value of MMK 118,090 million as set out in the table below:

**Table 11: Jade production**

Mineral Type	Sharing / Private	Number of Company	Unit	Production Volume	Production Value Million Kyat
Jade	Scope		Kilo	21,942,112	84,839
	Out of Scope		Kilo	9,735,661	33,251
				31,677,773	118,090

Source: MGE data

According to data reported by MGE, the Gems and Jade sales and exports are detailed as follows:

**Table 12: Gems and Jade exports**

Sales	Mineral Type	EUR			MMK			USD		
		Volume		Total sale in EURO	Volume		Total (in million MMK)	Volume		Total Exports in USD
		Carat	Kg		Carat	Kg		Pieces	Kg	
Emporium Sales	Gems	979,427.70	246.91	3,892,593	756,932.90	45.74	5,974.90			
	Jade		5.437.831	821,184,613		3,984,635	44,214			
Exports from Emporium	Gems	4,950.80	96.38	923,091						
	Jade		3,738,294	734,316,575						
Exports	Gems							23,485		1,055,812
Exports outside of Emporium	Jade (pieces)							2,036,736		
	Jade (packages)							5,094		
	Gems	-	-	-	-	-	-	23,670		1,172,857

Source: MGE data

#### Gems and Jade Sale valuation and allocation system:

According to MGE, valuation in accordance with Myanmar Gems Law is performed by a committee composed of the chairman of Myanmar Gems Enterprise, representatives from relevant departments, parliament representatives from relevant state and region / state, representatives of regional governments, gems and jade association representatives and third parties.

The geological graduates of the department are presented with jadeite, jade, and jade. Exploring gem pairs the unique stones presented at the show are limited in volume and can be estimated by auction prices, qualitative tests and good practice, as well as good practice. According to the prices of jade shown in emporium, the royalty fees are collected by valuation organisation.

Graduates of the Geology Degree have been awarded diplomas and master degree. Attend international exhibitions to gain international experience and the department invites outside consultants to hold seminars and the department was invited by staff from the department to attend a seminar held by the Jewellers Association in Yangon in January 2018.

According to the Myanmar Gems Act year 1995, rubies, sapphires and jade (20%) and other gems are subject to a 10% royalty fees. There is amended the Myanmar Gems Act which enacted on January,30 2019, rubies / sapphire and Jade (10%) and other gems are subject to a (5%) royalty fees.

Valuation of jade and rough jade and the prices for the gem exhibitions for the calculation of prices, outside market prices, type of market based on market and market prices are making necessary adjustments according to quality.



## Other Minerals

The production and exports value for other minerals as declared by SOEs (ME1 & ME2), amounted to MMK 490,781 million and MMK 25,098 million, respectively. The table below shows the contribution of each category of minerals in relation to the total production and exports of the other minerals sub-sector:

**Table 13: Other minerals production and exports**

Minerals	Production value (in million MMK)	in %	Export value (in million MMK)	in %
Lead, Zinc, Copper, Iron, Chromium, Antimony, Coal, Manganese, Nickel, Barite, Limestone, Gypsum (reported by ME 1)	398,199	81.14%	14,992	59.75%
Gold, Tin and Refined Tin (reported by ME 2)	92,582	18.86%	10,098	40.25%
<b>Total</b>	<b>490,781</b>	<b>100.00%</b>	<b>25,090</b>	<b>100.00%</b>

Source: ME 1 and ME 2 data

The pricing method is presented in the annex 6 of the report.

The breakdown by mineral of the volumes and values of production and exports is presented in the annex 6 of the report.

## Pearls

The total pearl production reported by MPE is detailed in the table below.

**Table 14 : Pearl production**

License	Production Volume	Unit	Production Value in million MMK
MPE+AQU	38,322	momme	1,996
ALT+BPM+OPC(z)	89,317	momme	4,537
MPE+ADM+NN	108,152	momme	5,893
TSK+OPC(z)+NN+OPC(j)	207,346	momme	13,919
<b>Total revenue</b>	<b>443,137</b>	<b>momme</b>	<b>26,345</b>

Source : MPE

The volume and value of sales that were reported by MPE is detailed in the table below.

**Table 15 : Pearl exports**

No.	Name of Emporium	Weight (Momme)	Sale Price		Total (in million MMK)
			EUR	USD	
1	Domestic sales	63,940	2,229,725	-	3,539.60
2	Exports	46,673	-	7,617,692	10,328.22
<b>Total</b>		<b>110,613</b>	<b>2,229,725</b>	<b>7,617,692</b>	<b>13,867.82</b>

Source : MPE data

## 1.4. Scope of the data collection and reconciliation

### Payment flows and data reported

MSG agreed that for the purpose of the EITI Report the revenues collected from the extractive sector in Myanmar for the fiscal year 2017-2018 would comprise the following sectors:

- Oil and Gas including their transportation; and
- Mining (including jade and gemstones, other minerals and pearl sectors).

The scope of revenue streams included for reconciliation include:

- all tax payments, non-tax payments and in-kind payments made or reported by companies selected in the scope and revenues received by or reported to the Government Agencies during the fiscal year 2017-2018; and
- all payments and transfers made or reported to SOEs and revenues received by or reported to Government Agencies during the fiscal year 2017-2018.

Payments made by companies not selected in the scope and social payments are disclosed unilaterally and do not form part of the reconciliation process.

### Extractive companies

For the mining sector, MSG identified 384 companies to be included in the reconciliation process for the fifth MEITI Report. The companies listed in Section 4.3 of the report meet the materiality threshold of **MMK 0.5 billion** for the Gems and Jade and other minerals sectors.

The detailed approach for the companies selected is detailed in the section 4 of the current report.

With regards to the Oil and Gas sector, MSG agreed to include all Oil and Gas operators in producing field and exploration companies without applying any materiality threshold. This has led to the selection of 56 Oil and Gas companies and 5 transportation companies within the reconciliation scope.

MSG also agreed to include all companies operating in the pearl producing field and exploration companies without applying any materiality threshold. These companies are listed in Section 4.3 of the report.

Details of the number of companies included within the 2017-2018 scope are set out in the table below:

**Table 16: Coverage per subsector**

EITI Scope		Coverage				
Sector	Oil and Gas	Oil and Gas Transportation	Gems and Jade	Mining	Pearl	MEC and MEHPCL related companies
Number of companies selected	56	5	209	94	11	9
Materiality	All companies	All companies	MMK 0.5 billion	MMK 0.5 billion	All companies	All companies
Actual coverage by sub sector	100%	100%	85%	96%	100%	100%
Actual overall reconciliation coverage			97%			

Source: EITI data

### Government Agencies

MSG agreed that all Government Agencies which receive extractive-related revenues from companies should be included within the reconciliation scope. Accordingly, MSG identified sixteen (16) Government Agencies to be included as listed in Section 4.4 of the report.

## 1.5. Comprehensiveness and reliability of data

### Comprehensiveness of data collected

#### Government

All the government agencies and SOEs submitted their reporting templates.

#### Companies

Details of data submission are presented in the table below:

**Table 17: Data submission follow-up**

Sector	Company selected in the scope	Company submitted their reporting template
Oil and Gas	56	19
Oil and Gas transportation	5	5
Gems and Jade	209	205
Other minerals	94	79
Pearl	11	11
<b>Total</b>	<b>375</b>	<b>319</b>

Source: EITI data

All companies included in the reconciliation scope have submitted their reporting templates according to the reporting instructions approved by MSG, with the exception of:

- (36) Oil and Gas companies whose payments to Government Agencies are detailed in the section 5.1.4.
- (4) Gems and Jade companies (A K&K, Phar Kant Sai Bon, Palaung National, Myat Myittar Mon (G & J) Co.,Ltd). According to the data submitted by Government Agencies, there were no payments made by these companies except for:
  - A K&K for which MGE has reported royalties amounting MMK 43,957,340; and
  - Phar Kant Sai Bon for which MGE has reported a total payment of MMK 12,053,265.
 The detail of those companies is presented in the section 5.2.5.
- (15) other minerals companies; according to the data submitted by Government Agencies, the payments made by these companies to government agencies is presented in the section 5.3.5.

All the pearl and transportation companies submitted their reporting templates.

#### Impact of the non-submission on the comprehensiveness of the extractive sector revenue

The impact of the non-submission of the RT is presented as below :

**Table 18.1: the comprehensiveness of the extractive sector revenue**

Sub-sector	Government revenue after adjustments	Total non-submission companies	%
Oil and Gas sector	991,661	15,234	2%
Oil and Gas transportation sector	405,806	-	0%
Gems and Jade sector	411,751	56	0%
Other minerals sector	124,230	3,358	3%
Pearl sector	2,498	-	0%
<b>Total</b>	<b>1,935,946</b>	<b>18,648</b>	<b>1%</b>

We can conclude from the above that this non submission has no impact on the opinion of the IA on the comprehensiveness of the extractive sector revenue.

### Reliability of data submitted

#### Companies

As decided by MSG, the reporting templates should be approved by an official authorised person from the company.

Accordingly, all the Oil and Gas transportation companies most of companies in the other sectors have submitted reporting templates signed by an authorised officer as requested by the MSG, except for:

- for the Oil and Gas Sector: of the 19 companies which submitted a reporting template, only “CFG Energy Pte Ltd” did not submit a reporting template approved by an authorised company official.  
Two companies did not submit their audited financial statements for the FY 2017-2018, namely “Gold Petrol Joint Operating Company Inc., (GJOC Inc.)” and “CFG Energy Pte Ltd.,”.
- For the Gems and Jade Sector: of the 205 companies which submitted a reporting template, 54 companies did not submit a reporting template approved by an authorised company official.  
Additionally, 101 companies did not submit the audit report for their financial statements for the FY 2017-2018.
- For the Other Minerals Sector: of the 67 companies which submitted a reporting template, 12 companies did not submit a reporting template approved by an authorised company official.  
Additionally, 51 companies did not submit their audited financial statements for the FY 2017-2018.
- For the Pearl Sector: of the 11 companies which submitted a reporting template, two companies “Belppearl Myanmar Co., Ltd” and “Pyae Phyto Tun Co., Ltd” did not submit a reporting template approved by an authorised company official.  
Additionally, “Pyae Phyto Tun Co., Ltd” did not submit its audited financial statements for the FY 2017-2018.

The detail of those companies is presented in the annex 7 companies’ profile.

#### Impact of the non-signature of the RT on the reliability of the extractive sector revenue

The impact of the non-submission of the RT is presented as below :

**Table 18.1: the reliability of the extractive sector revenue**

Sub-sector	Government revenue after adjustments	Not signed RT	%
Oil and Gas sector	991,661	1,356	0%
Oil and Gas transportation sector	405,806	-	0%
Gems and Jade sector	411,751	55,321	13%
Other minerals sector	124,230	6,003	5%
Pearl sector	2,498	38	2%
Total	1,935,946	62,717	3%

We can conclude from the above that the total payments of the companies that did not submit signed RT represent 3% of the extractive revenue, which is slightly above the materiality decided by the MSG (2%). However, the impact of this excess is mitigated by the following fact :

- The comprehensiveness of the extractive revenue; and
- the non-significant difference noted during the reconciliation of payments between companies and government agencies and the SOEs detailed in the next section.

#### Government Agencies

With regards to Government Agencies including SOEs, reporting templates should be signed by an authorised officer and certified by the Office of the Auditor General (OAG).

This has been complied with by all SOEs and Government Agencies selected within the reconciliation scope except for MGE unilateral disclosure for which we only received the certified reporting templates of companies in scope.

All reconciled revenues reported by Government Agencies and SOEs, were certified by the Office of Auditor General (OAG) except for MGE unilateral disclosure which payments amounted MMK 49,737 million and represents 2.6% of the total revenues reported by Government Agencies and SOEs.

## IA opinion regarding the comprehensiveness and the reliability of the revenue

The IA concluded from the above that the final assessment of the overall comprehensiveness and reliability of reconciled financial data from the companies, SOEs and government entities to be satisfactory.

## 1.6. Summary of the reconciliation results

Total revenues received from extractive companies as declared by Government Agencies amounted to MMK 2,607,408 million in the period covered by the report. The table and figures shown below summarise the reconciled revenues and revenues disclosed unilaterally by the government in accordance with the reconciliation scope.

Table 19: Revenue of the extractive sector

*Figures in million MMK*

Sub-sector	Reconciled revenues	Payments from companies not selected in the reconciliation scope	Social contributions	Total revenues
Oil & Gas	985,714	-	5,948	991,662
Oil & Gas transportation	401,245	-	4,561	405,806
Gems & Jade (including Military subsidiaries)	349,507	62,106	381	411,994
Other Minerals	110,807	4,802	8,292	123,901
Pearl	1,853	-	644	2,497
<b>Total</b>	<b>1,849,126</b>	<b>66,908</b>	<b>19,826</b>	<b>1,935,860</b>
<b>%</b>	<b>95.52%</b>	<b>3.46%</b>	<b>1.02%</b>	<b>100.00%</b>

Source : EITI data

## Reconciliation of payments to the Government Agencies

BDO LLP has been contracted to reconcile taxes reported by extractive companies and Government Agencies in order to identify and clarify any potential discrepancies in the payments reported in the declarations. Disaggregated reporting is detailed in Section 5 of this report.

A net difference of **MMK (20,872) million** (US\$ 13.1 million) representing (1.13%) of Government reporting templates after adjustments remained unreconciled.

Table 20: Reconciliation result per sub-sector

*In million MMK*

Sub sector	Extractive companies	Government	Positive difference		Negative difference		Net Difference	
			Amount	%	Amount	%	Amount	%
Oil and Gas	970,582.7	985,714.0	126.2	0.01%	(15,257.5)	(1.55%)	(15,131.3)	(1.54%)
Gems and Jade	345,354.5	349,264.2	85.0	0.02%	(3,994.7)	(1.14%)	(3,909.7)	(1.12%)
Gems and Jade Military subsidiaries	870.6	846.8	23.8	2.81%	(0.0)	0.00%	23.8	2.81%
Other minerals	106,100.8	110,732.9	340.3	0.31%	(4,972.4)	(4.49%)	(4,632.1)	(4.18%)
Oil and Gas Transportation	403,410.4	401,244.7	2,165.8	0.54%	-	0.00%	2,165.8	0.54%
Pearl	1,860.5	1,853.4	7.5	0.40%	(0.3)	(0.02%)	7.2	0.39%
<b>Total</b>	<b>1,828,179.49</b>	<b>1,849,655.95</b>	<b>2,748.43</b>	<b>0.15%</b>	<b>(24,224.89)</b>	<b>(1.31%)</b>	<b>(21,476.46)</b>	<b>(1.16%)</b>

Excluding data related to entities not subject to EITI reporting

The unreconciled difference of (1.16%) is below the final acceptable discrepancy threshold of 2% of the total revenues declared by the Government Agencies/SOEs set by MSG.

The analysis of the unreconciled difference by sector is as follows:

#### Oil and Gas sector

The total unreconciled discrepancies amounted to MMK (15,131.3) million representing (1.54%) of total payments reported by Government Agencies which is **below** the final acceptable discrepancy threshold of 2%. This is the sum of positive differences of MMK 126.2 million and negative differences amounting to MMK (15,257.5) million. This unreconciled difference is summarised in the table below.

Table 21: Oil and gas sector: differences raised

Reasons for differences	Amount in million MMK
Reporting template not submitted by the extractive company (a)	(15,234.26)
Tax not reported by the extractive company (b)	(42.1)
Tax not reported by the Govt Body	145.1
Not material difference	0.05
<b>Total</b>	<b>(15,131.3)</b>

Source: EITI data

#### (a) Reporting template not submitted by the extractive company

This difference relates to taxes reported by Government Agencies. However, the companies failed to include these payments in their reporting templates.

Eight (8) companies did not submit their reporting templates and for which Government Agencies reported payments. Those companies are:

*Figures in million MMK*

Company	Amount reported by the government agencies
CNPC International Ltd.	(9,080.6)
Nippon Oil Exploration (Myanmar) Ltd	(4,307.2)
Eden Group Co., Ltd	(1,166.8)
Gail JJ India Ltd	(500.8)
Smart Technical Services Ltd.	(110.7)
Machinery and Solutions Co., Ltd.	(49.7)
Royal Marine Engineering Co.,Ltd	(16.2)
ONGC Videsh Ltd.,	(2.0)
<b>Total</b>	<b>(15,234.2)</b>

Source: EITI data

#### **(b) Taxes not reported by extractive companies**

This difference is mainly related to the taxes reported by IRD but not reported by the extractive companies including corporate income tax and stamp duties.

#### **Gems and Jade**

The total unreconciled discrepancies amounted to MMK (3,909.7) million representing (1.12%) of total payments reported by Government Agencies which is below the final acceptable discrepancy threshold of 2%. This is the sum of positive differences of MMK 85.0 million and negative differences amounting to MMK (3,994.7) million. These unreconciled differences are summarised below:

**Table 22: Gems and Jade sector : differences raised**

<b>Reasons for differences</b>	<b>Total payments (MMK)</b>
Tax not reported by the extractive company	(4,616,377,900)
Tax not reported by the Govt Body	789,802,898
Reporting template not submitted by the extractive company	(56,010,605)
Not material difference < 1.5 Million Kyats	(29,140,021)
Reporting template not submitted by the Govt Body	2,000,000
<b>Total differences</b>	<b>(3,909,725,628)</b>

#### **(a) Taxes not reported by extractive companies**

This difference relates to taxes declared by Government Agencies as a payment from Gems and Jade companies. However, the companies failed to include these payments in their reporting templates. This difference represents the final unexplained difference after performance of the reconciliation work.

Details of this discrepancy by company and by tax are presented in Section 5.2.4 of the report.

#### **(b) Taxes not reported by Government Agencies**

This difference relates to taxes declared by Gems and Jade companies as a payment to Government Agencies. However, the Government Agencies did not report these payments in their reporting templates. This difference represents the final unexplained difference after performance of the reconciliation work and input of the confirmed adjustments.

#### **(c) Reporting templates not submitted by extractive companies**

This difference is related to taxes declared by the Government Agencies for companies which did not submit a reporting template.

#### **(d) Immaterial differences < 1.5 Million Kyats**

These differences correspond to immaterial differences falling below the materiality threshold of MMK 1,500,000 as described in the Section 2.3 above.

## Other minerals

The total unreconciled discrepancies amounted to MMK (4,632.1) million representing (4.18%) of total payments reported by Government Agencies which is above the final acceptable discrepancy threshold of 2%. This is the sum of positive differences of MMK 340.3 million and negative differences amounting to MMK (4,972.4) million. These unreconciled differences are summarised in the table below.

**Table 23: Other minerals sector : differences raised**

Final difference breakdown	Amount in MMK
Reporting templates not submitted by extractive companies	(3,357,648,445)
Taxes not reported by extractive companies	(2,031,250,696)
Taxes not reported by Government Agencies	767,135,805
Exchange rate differences	(11,130,463)
Not material difference < 5 Million Kyats	779,047
Total differences	(4,632,114,751)

### (a) Reporting templates not submitted by extractive companies

This difference relates to taxes reported by Government Agencies but not by companies.

Details of this discrepancy by company and by tax are presented in Section 6.3.3 of the report.

### (b) Taxes not reported by extractive companies

This difference relates to taxes declared by Government Agencies as a payment from Other Minerals companies. However, the companies failed to include these payments in their reporting templates. This difference represents the final unexplained difference after performance of the reconciliation work and input of the confirmed adjustments.

Details of this discrepancy by company and by tax are presented in Section 6.3.3 of the report.

### (c) Taxes not reported by Government Agencies

This difference relates to taxes declared by Other Mineral companies as a payment to Government Agencies. However, the Government Agencies did not include these payments in their reporting templates. This difference represents the final unexplained difference after adjustments.

Details of this discrepancy by company and by tax are presented in Section 6.3.3 of the report.

### (d) Exchange rate differences

This difference relates to taxes declared by Other Mineral companies in MMK and reported by Government Agencies in USD. The amount declared by Government Agencies was converted using the annual average exchange rate MMK/USD.

Details of this discrepancy by company and by tax are presented in Section 6.3.3 of the report.



## Oil and Gas Transportation

The total unreconciled discrepancies amounted to MMK 2,165.7 million representing 0.5% of total payments reported by Government Agencies which is below the final acceptable discrepancy threshold of 2%. These unreconciled differences are summarised in the table below.

**Table 23: O&G transportation sector: differences raised**

Reasons for differences	Unreconciled difference (MMK)
Exchange rate differences (a)	1,209,553,546
Taxes not reported by Government Agencies (b)	956,189,272
Immaterial differences	23,531
<b>Total Differences</b>	<b>2,165,766,349</b>

### (a) Exchange rate differences:

Those differences resulted from the use of different exchange rate between IRD and the exchange rate used in this report to convert the payments made by the companies in USD.

### (b) Taxes not reported by Government Agencies

This difference relates to taxes declared by companies as a payment to Government Agencies. However, the Government Agencies failed to include these payments in their reporting templates. The differences are detailed by company by tax in the table below.

Company	SEAGP MMK	SEAOP MMK	Total MMK
Transit fees collected by the MCD	931,840,172		931,840,172
Stamp Duty	14,531,200	9,817,900	24,349,100
<b>Total Differences</b>	<b>946,371,372</b>	<b>9,817,900</b>	<b>956,189,272</b>

## Pearls

The total unreconciled discrepancies amounted to MMK 7.2 million representing 0.39% of total payments reported by Government Agencies which is below the final acceptable discrepancy threshold of 2%. These unreconciled differences are summarised in the table below.

**Table 24: Pearl sector : differences raised**

Reasons for differences	Unreconciled differences ((MMK))
Taxes not reported by Government Agencies (a)	7,465,632
Taxes not reported by extractive companies	(299,544)
Immaterial differences	(11)
<b>Total differences</b>	<b>7,166,077</b>

### (a) Taxes not reported by Government Agencies

This difference relates to taxes declared by companies as a payment to Government Agencies. However, the Government Agencies failed to include these payments in their reporting templates. The differences are detailed by tax in the table below.

Payment flows	Amount in million MMK
Customs duties	4.68
Withholding Tax	1.86
Stamp Duties	0.80
Other Fees	0.13
<b>Total</b>	<b>7.47</b>

## Reconciliation of payments in kind to Government Agencies

We reconciled in kind payments made by extractive companies selected within the scope with commodities received by Government Agencies and note differences as detailed in the table below.

**Table 24: Reconciliation of payments in kind**

Payment in kind	Government Agency	Extractive companies	Government	Differences
<b>Oil and Gas sub-sector</b>				
Payment in kind (Barrels)	MOGE	1,084,233	1,085,708	(1,475)
Payment in kind (Mscf)	MOGE	706.853	706.853	-
<b>Gems and Jade sub-sector</b>				
Payment in kind (Jade in Kg)	MGE	1,919	59,092	(57,173)
<b>Mining sub-sector</b>				
Gold in ToZ	ME (2)	7,707	8,371	(663)
Tin in MT	ME (2)	396	400	(4)
Copper in MT	DOM	14,709	14,709	-
Nickel in MT	ME (1)	531	531	-
Nickel in MT	DOM	-	867	(867)
Barite in MT	ME (1)	514	-	514
<b>Pearl sub-sector</b>				
Pearl in Carat	MPE	62,572	62,572	-

## Reconciliation of production and exports

We reconciled the production and exports figures declared by extractive companies selected within the scope with those of Government Agencies and note the differences as detailed in the table below.

### Oil and condensate production reconciliation:

Table 25: Oil and condensate production reconciliation

Company name	Company		SOE		Difference	
	Quantity produced in bbl	Value in USD	Quantity produced in bbl	Value in USD	Quantity produced in bbl	Value in USD
GOLDPETROL JOC. Inc.	829,549	45,488,963	829,549	45,488,963	-	-
MPRL&ELP Pte Ltd. (Yangon Branch)	487,490	25,864,308	487,490	25,864,308	-	-
PC Myanmar (Hongkong) Limited	1,603,783	Nc	1,603,783	nc	-	nc
Total	2,920,822	71,353,270	2,920,822	71,353,270	-	-

Source: EITI data

### Gas production reconciliation:

Table 26: Gas production reconciliation

Company name	Company		SOE		Difference	
	Quantity produced in Mscf	Value in USD	Quantity produced in Mscf	Value in USD	Quantity produced in Mscf	Value in USD
GOLDPETROL JOC. Inc.					-	-
MPRL&ELP Pte Ltd. (Yangon Branch)	707	1,168,429	707	1,168,429	-	-
PC Myanmar (Hongkong) Limited	81,407		81,407		-	-
Posco Daewoo Corporation (Myanmar E&P Office)	172,023		172,023		-	-
PTTEP International Ltd.	110,748	703,921,306	114,492	nc	(3,744)	na
Total E&P Myanmar	281,782	1,422,861,113	281,782	nc	-	na
Total	646,667	2,127,950,849	650,411	1,168,429	(3,744)	-

Source: EITI data

(a) Oil and Gas sales

The table below shows the differences between the sales reported by Oil and Gas companies and MOGE.

Oil sales reconciliation:

Table 27: Oil sales reconciliation

Company name	Type of sales	Company		SOE		Difference	
		Quantity sold in bbl	Value in USD	Quantity sold in bbl	Value in USD	Quantity sold in bbl	Value in USD
GOLDPETROL JOC. Inc.	Domestic sales	5,900	323,845	5,900	323,845	-	-
PC Myanmar (Hongkong) Limited	Exports	1,824,806	106,739,343	1,824,806	106,739,343	-	-
Total		1,830,706	107,063,188	1,830,706	107,063,188	-	-

Source: EITI data

Gas exports reconciliation:

Table 28: Gas exports reconciliation

Company name	Type of sales	Company		SOE		Difference	
		Quantity sold in MMsf	Value	Quantity sold in MMsf	Value in USD	Quantity exported	Value
PC Myanmar (Hongkong) Limited	Export	74,447	482,749,621	74,447	482,749,621	-	-
Posco Daewoo Corporation (Myanmar E&P Office)	Export	139,940	916,255,910	139,940	916,255,910	-	-
PTTEP International Ltd.	Export	87,177	572,965,671	87,177	572,965,671	-	-
Total E&P Myanmar	Export	210,926	1,026,494,470	201,750	1,026,494,470	9,176	-
Total		512,489	2,998,465,672	503,313	2,998,465,672	9,176	-

## Gas domestic sales reconciliation:

Table 29: Gas domestic sales reconciliation

Company name	Type of sales	Company		SOE		Difference	
		Quantity sold in MMsf	Value	Quantity sold in MMsf	Value in USD	Quantity exported	Value
Posco Daewoo Corporation (Myanmar E&P Office)	Domestic sales	26,159	170,432,298	26,159	170,432,298	-	-
PTTEP International Ltd.	Domestic sales	23,571	130,955,635	23,571	130,955,635	-	-
Total E&P Myanmar	Domestic sales	64,888	204,736,866	64,889	204,736,866	-	-
Total		114,618	506,124,798	114,619	506,124,798	-	-

## Actual MGE, Gems and Jade production

Table 30: Gems and Jade production

Production	Company		MGE		Difference	
	Volume	Unit	Volume	Unit	Volume	Unit
Gems	231,982	CARAT	599,119	CARAT	(367,138)	CARAT
	174,579	KG	33	KG	174,547	KG
Jade	15,504,237	KG	21,942,112	KG	(6,437,875)	KG

Source: EITI data

## Actual MGE, Gems and Jade Emporium Sales

Table 31: Gems and Jade Emporium sales

Figures in MMK

Sales		Per company				Per Government				Final difference			
		Sales in Euro		Sales in MMK		Sales in Euro		Sales in MMK		Sales in Euro		Sales in MMK	
		Volume	Value	Volume	Value	Volume	Value	Volume	Value	Volume	Value	Volume	Value
Gems	In Carats	69,985	749,598	234,630	3,732,385,679	431,134	1,188,206	281,385	3,537,725,613	-361,149	-438,608	-46,754	194,660,066
	In Kilo	185	353,392	27,756	1,267,043,774	154	586,974	4	-	30	-233,582	27,752	1,267,043,774
Jade	In Kilo	2,954,770	1,193,711,829	3,254,048	70,149,095,095	3,641,627	646,733,723	2,749,434	27,384,178,094	-686,857	546,978,106	504,614	42,764,917,001

Source: EITI data

## Other mineral production

Table 32: Other mineral production

Type of mineral produced	Company		MONREC		Difference	
	Volume	Unit	Volume	Unit	Volume	Unit
Bauxite		MT	134,437.00	MT	(134,437.00)	MT
Cathode Copper	195,485.00	MT	70,755.84	MT	124,729.16	MT
Clay		MT	97,490.26	MT	(97,490.26)	MT
Coal	390,414.00	MT	607,213.50	MT	(216,799.50)	MT
Copper Ore	1,380.00	MT	2,380.00	MT	(1,000.00)	MT
FERRONICKEL	61,291.84	MT	62,366.80	MT	(1,074.96)	MT
Gold	18,275.73	Toz	46,782.99	Toz	(28,507.26)	Toz
Granite		MT	330.00	MT	(330.00)	MT
Gypsum	3,500.00	MT	284,808.00	MT	(281,308.00)	MT
Iron Ore		MT	950.00	MT	(950.00)	MT
Lead Ore	25,954.05	MT	36,222.05	MT	(10,268.00)	MT
Limestone	2,829,911.67	MT	7,734,374.03	MT	(4,904,462.36)	MT
Marble	3,730.00	MT	9,680.17	MT	(5,950.17)	MT
tin & tungsten	917.32	MT	1 237.52	MT	(320.20)	MT
Zinc	18,068.80	MT	13,384.95	MT	4,683.85	MT

Source: EITI data

## Other mineral exports

Table 33: Other mineral exports

Type of mineral	Company				MONREC				Differences		
	Volume	Unit	Value	Currency	Volume	Unit	Value	Currency	Volume	Value	Currency
Antimoni Concentrate				USD	330	MT	340,380	USD	(330)	(340,380)	USD
Cathode Copper	100,682	MT	619,429,288	USD				USD	100,682	619,429,288	USD
Coal	2,215,000	MT	79,740,000	USD					2,215,000	79,740,000	USD
FERRONICKEL	80,527	MT	291,958,249	USD					80,527	291,958,249	USD
Iron Ore				USD	10,830	MT	486,070	USD	(10,830)	(486,070)	USD

Type of mineral	Company				MONREC				Differences		
	Volume	Unit	Value	Currency	Volume	Unit	Value	Currency	Volume	Value	Currency
Lead	756,828	MT	701,390,745	USD	24,117	MT	4,416,440	USD	732,711	696,974,305	USD
Marble	1,267	MT	687,340	USD	1,289	MT	690,954	USD	(22)	(3,614)	USD
Tin & Tungsten	101,089	MT	694,591,516	USD					101,089	694,591,516	USD
Zinc	27,588	MT	1,014,248,378		6,395	MT	808,795	USD	21,193	1,013,439,583	USD

Source: EITI data

Details of the reconciliation and adjustments made by company and by tax are set out in Section 6 of the report.

## Reconciliation of payments and transfers made by SOEs to government agencies

Following the reconciliation of payments and transfers made by SOEs to Government Agencies, we note a total difference for payments amounting 849,9 million MMK representing (0.127%) of total payments and 478.8 million MMK representing 0.037% of total transfers:

**Table 34: SOEs payments and transfers reconciliation**

	Per SOE			Per Government			Figures in MMK	
	Original	Adjust	Final	Original	Adjust	Final	Final difference	%
Total cash payments	683,826,791,920	(16,798,224,152)	667,028,567,768	667,878,535,349	-	667,878,535,349	(849,967,581)	(0.127%)
Myanmar Customs Department (MCD)	26,541,708,216	(16,798,224,152)	9,743,484,064	9,965,846,743	-	9,965,846,743	(222,362,679)	-
Customs duties	9,743,484,064		9,743,484,064	9,965,846,743		9,965,846,743	(222,362,679)	
Commercial Tax	16,798,224,152	(16,798,224,152)	-	-		-	-	
Internal Revenue Department (IRD)	657,285,083,704	-	657,285,083,704	657,912,688,606	-	657,912,688,606	(627,604,902)	-
Corporate Income Tax	211,188,379,000		211,188,379,000	211,188,610,650		211,188,610,650	(231,650)	
Commercial Tax for MOGE contractors' sales	152,589,852,237		152,589,852,237	153,655,609,396		153,655,609,396	(1,065,757,159)	
Specific Goods Tax	293,503,836,477		293,503,836,477	293,065,452,570		293,065,452,570	438,383,907	
Capital Gains Tax	3,015,990		3,015,990	3,015,990		3,015,990	-	
Social Payments	3,408,047,844		3,408,047,844	-		-		
Mandatory Corporate Social Responsibility	3,408,047,844		3,408,047,844	-		-		
Transfers	1,299,489,659,420	-	1,299,489,659,420	1,299,497,714,723	-	1,299,497,714,723	478,887,912	0.037%
Transfers to OGD	352,874,435,723		352,874,435,723	352,874,435,723		352,874,435,723	-	
Transfers to Treasury department (State contribution 20%)	171,937,602,000		171,937,602,000	171,937,602,000		171,937,602,000	-	
Transfer to UFA other accounts	774,677,621,697		774,677,621,697	774,685,677,000		774,685,677,000	(8,055,303)	
Opening balance UFA OA	6,490,237,644,825		6,490,237,644,825	6,489,990,145,361		6,489,990,145,361	247,499,464	
Closing balance UFA OA	7,264,915,266,111		7,264,915,266,111	7,264,675,822,361		7,264,675,822,361	239,443,750	

Source : EITI data

Templates detailed by SOE showing the reconciliation work are set out in Section 6.6 of this report.



## 1.7. Findings and recommendations

We raised several findings and have made recommendations with a view to improve the EITI process in Myanmar and governance of the extractive sector and revenue management. The findings raised are summarised as follows:

These findings and the associated recommendations are detailed in Section 7 of this report

Number	Findings titles
1	Completeness of Beneficial Ownership information
2	Publication of loans contracts
3	Including the Myanmar Port Authority (MPA) in the scope
4	Compliance of the Extractive sector regulation and transparency with the economic policy of the Union of Myanmar
5	Including mandatory BO disclosure in the process of awarding, and transferring extractive licenses in Myanmar
6	Implementation of systematic disclosure of EITI information
7	Submission of the reporting templates

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## 2. APPROACH AND METHODOLOGY

The reconciliation of revenues from the extractive sector consisted of the following steps:

- conduct a scoping study to determine the scope of the reconciliation exercise and to design the reporting;
- preparation of a reporting template (See Annex 1) and reporting instructions;
- collection of payment and other data from Government Agencies and extractive companies which provide the basis for reconciliation;
- comparison of payments and other data reported by Government Agencies and extractive companies to determine if there are discrepancies between the amounts reported as being received by the authorities and the amounts reported as being paid by taxpayers; and
- contact Government Agencies and extractive companies to investigate and resolve identified discrepancies.

Our fieldwork started on 30 September 2019 with a meeting with the EITI National Coordination Secretariat during which we were able to:

- follow up documents requested before the commencement of the fieldwork;
- define a work plan for the scoping study and reconciliation exercise;
- discuss the EITI framework and review the objectives; and
- schedule all interviews to be carried out with key Government Agencies and company representatives.

### 2.1. Scoping Study

One of the objectives of the report is to clearly define the scope of the EITI reporting process, the reporting templates, the data collection process and the publication schedule of the EITI report, in accordance with the EITI Standard (Version 2016) and the objectives agreed by MSG and its expectations.

The EITI scope approved by MSG provided the basis for the design of Reporting Templates to be used by reporting entities for communicating payments and receipts related to the extractive sector for the period from April 2017 to March 2018.

The determination of the reconciliation scope consists in particular to:

- identify significant revenue streams from extractive sector;
- identify extractive companies which are required to prepare and submit a Reporting Template;
- identify Governments Agencies which are required to prepare and submit reporting templates;
- prepare a reporting template to be completed by the reporting entities; and
- ensure that data submitted by reporting entities is credible.

This Scoping report aims to define the scope of reconciliation. Non-financial information stated in EITI Standard should be considered in detail in the EITI Report.

The financial flows to be included in the reconciliation, the Government Agencies and companies which were required to report were determined by MSG based on the basis of the scoping study conducted by the IA.

In accordance with the ToR for the Engagement, we were required to carry out a scoping study which eventually determined the scope of the fifth MEITI Report, including a proposal of:

- the materiality threshold for receipts and payments by sub-sector.

- taxes and revenues to be included.
- companies and Government Agencies to be included in the report; and
- assurances to be provided by reporting parties to ensure credibility of the data being reported.

The scope of the EITI report as decided by MSG is described in Section 4 of the report.

### Meetings with stakeholders

We conducted interviews with key government officials between 30 September and 10 October 2019.

During these meetings, we were able to obtain an understanding of the regulatory and fiscal frameworks of the extractive sector, the revenue collection process and key events that may have occurred during the period from April 2017 to March 2018, including important exploration activities and main reforms.

Accordingly, the stakeholders we contacted were:

<b>CSO</b>
NRGI
Other CSOs (Sone Sii, TNC, Spectrum)
Myanmar Forest Products Merchant Federation (MFPMF)
Myanmar Gems and Jade Jewellery Association (MGJEA)
MATA
<b>Government Agencies</b>
MCD
Department of Trade
Internal Revenue Department (IRD)
General Administration Department, Ministry of the Office of Union Government
Central Statistical Organization
MOBD, Budget Dept. (SEE unit), Treasury Dept.
Office of the Auditor General
DGSE, Department of Mining (DOM), Mining Enterprises (ME1, ME2)
& Myanmar Pearl Enterprise (MPE)
Myanmar Oil and Gas Enterprise (MOGE)
Oil and Gas Planning Department (OGPD)
Myanmar Petrochemical Enterprise (MPE)
Myanmar Gems Enterprise (MGE)
Myanmar Federation of Mining Association (MFMA)
<b>Private Sector</b>
Total Myanmar E&P
PanAust Services (Myanmar) Company Ltd.

## 2.2. Data collection

A standard reporting template and instructions were designed to facilitate the process for the reporting entities. The template was designed to include the revenue streams paid to each Government agency and was formatted in such a way that companies could easily identify and determine the appropriate amounts to be disclosed. The reporting templates were sent electronically to the reporting entities.

The companies and Government Agencies were required to report directly to the Reconciler, and they were also requested to whom they were instructed to direct any questions on the reporting templates.

Companies and Government Agencies were requested to submit a breakdown of payments by date and by receipt in the supporting schedules.

## 2.3. Reconciliation and investigation of discrepancies

The data reconciling exercise was carried out between 19 January and 31 January 2020. In carrying out the reconciliation, we performed the following procedures:

**Initial Reconciliation Procedures:** Figures reported by extractive companies were compiled item by item and compared with figures reported by Government Agencies. As a result, all discrepancies identified have been listed by item in relation to each Government Agency and company.

In cases where the reported revenue data from Governmental Agencies agreed with a company's reported payment data, with deviation within the allowable variance as described in section below, the government figures were considered to be confirmed and no further action was undertaken.

In cases where the reported revenue data from Governmental Agencies did not agree with a company's reported payment data and the difference was not within the allowable variance, discrepancies were identified for each company and Government Agency and the discrepancies were subject to further investigations before completing the initial reconciliation report.

**Reconciliation Variance and Level of Effort:** As part of the reporting template finalisation, a variance threshold of MMK 1.5 million was set to help determine an acceptable level of effort to be spent in attempting to resolve discrepancies.

In cases where the reported revenue data from Government Agencies did not agree with the company's reported payment data, and the discrepancies were at or below the variance threshold, the Reconciler concluded that the discrepancies were not material to the MEITI Report.

**Follow-Up Procedures to Investigate Differences:** In cases where the reported revenue data from Governmental Agencies did not agree with the company's reported payments and the discrepancies were outside the variance, the IA considered the discrepancies to be material and further investigations were performed in a bid to resolve these discrepancies. In such instances, the Government Agencies and companies were requested to provide supporting documents and/or confirmations in respect of any adjustments to the data provided in the original reporting templates.

We contacted the reporting entities and arranged meetings with relevant officials. We also reviewed additional supporting documentation evidencing the payments reported. In instances where we were unable to identify the reason for the discrepancies following the review of additional supporting evidence, we concluded that the discrepancies were "undetermined / unexplained". The results of our work are presented in Section 5 of the report. The list of persons contacted or involved is detailed as below:

No	Name	Position
<b>National Coordination Secretariat (NCS)</b>		
1	U Soe Win	National Coordinator
2	U Aung Khine	Deputy National Coordinator
3	U Htun Paw Oo	Technical Specialist
4	Daw Zin Mar Myaing	Programme and Technical Advisor
5	Daw Hnin Htet Htet Aung	Program Manager
6	U Nay Min Maung	Technical Coordinator
7	U Hein Htet Soe	Technical Officer
8	U Kyaw Thin Maung	Program Assistant
9	U Zwe Sithu Aung	BO Coordinator
10	Daw Htet Nandar Aung	Senior Communication Officer
11	U Zin Ko Ko Aung	Communication Officer

No	Name	Position
12	U Soe Thiha Naing	Admin Officer
13	U Tat Tun Sai	Admin Assistant
14	U Maung Maung Myint Lwin	IT Technician
<b>Budget Department (BD)</b>		
1	Daw Khin Khin Lwin	Director
2	Daw Khin Pa Pa Khaing	Deputy Director
3	Daw Thwe Thwe Tun	Deputy Director
4	Daw Chaw Su Khaing	Deputy Director
5	Daw Myo Myint Than	Assistant Director
6	Daw Phyu Phyu Thant	Assistant Director
7	Daw Shwe Ye Win	Staff Officer
8	Daw Mai Khin Nway Shein	Staff Officer
9	Daw Moe Moe Aye	Staff Officer
10	Daw Sein Lae Lae	Staff Officer
11	Daw Su Yee Hlaing	Deputy Staff Officer
<b>Budget Department (SEE)</b>		
1	Daw War War Tun	Director
2	Daw Chaw Su Khine	Deputy Director
3	Daw Swe Zin Oo	Assistant Director
4	Daw Cho Cho Win	Assistant Director
5	Daw Moe Thuzar Win	Assistant Director
6	Daw May Zin Phyu	Assistant Director
7	Daw Naw Yin Yin Myint	Staff Officer
8	Daw Aye Aye Mon	Staff Officer
<b>Treasury Department (TD)</b>		
1	Daw Than Than Win	Director
2	Daw Khin Nyo Theint	Assistant Director
3	Daw Hay Mar Hnin	Staff Officer
4	Daw Ei Ei Aung	Staff Officer
5	Daw Marlar Soe	Staff Officer
<b>Internal Revenue Department (IRD)</b>		
1	Daw Mu Mu Saw	Director (Statistics Directorate)
2	U Ne Lin Aye	Deputy Director
3	U Aung Lwin	Assistant Director
4	U Myint Naing Oo	Assistant Director
5	Daw Aye Aye Cho	Assistant Director
6	Daw Thidar Hlaing	Assistant Director
7	Daw Thidar Moe	Assistant Director
8	Daw Tin Mar Mar Thet	Assistant Director
9	Daw Swe Swe Oo	Assistant Director
10	Daw Yu Yu Sein	Assistant Director
11	Daw Myat Theingi	Staff Officer
12	Daw Sandar	Staff Officer
13	Daw Nay Chi Khaing	Staff Officer
14	U Soe Naing	Staff Officer
15	Daw Wai Wai Phyo	Staff Officer
16	U Zaw Moe Kyaw	Staff Officer
17	U Aung Kyaw Oo	Staff Officer
18	Daw Thin Thin Naing	Staff Officer
19	Daw May Su Thar	Staff Officer

No	Name	Position
20	Daw Ei Ei Khaing	Deputy Staff Officer
21	Daw Moe Moe Hlaing	Deputy Staff Officer
22	U Kyaw Swar Linn	Deputy Staff Officer
23	U Hein Zaw	Deputy Staff Officer
24	Daw Kyaw Mone Yee	Deputy Staff Officer
25	U Kyaw Zin Oo	Deputy Staff Officer
26	U Thet Ko Oo	Deputy Staff Officer
27	U Wai Myo Zin	UD
<b>Myanmar Customs Department (MCD)</b>		
1	U Than Swe Tint	Assistant Director
2	U Zaw Zaw	Assistant Director
3	Daw Shwe Sin Win	Custom Inspector
4	Daw May Yadanar Tun	Custom Inspector
5	Daw Chaw Kay Khaing	Custom Inspector
6	Daw Win Win Than	Deputy Custom Inspector
<b>Office of the Auditor General of the Union(OAG)</b>		
1	Daw Khaing Khaing Ag	Director General
2	Daw San San Win	Deputy Director General
3	Daw Hla Hla Kyein	Director
4	Daw San San Myint	Director
5	Daw Hla Than	Deputy Director (Natural Resources)
6	Daw Mary	Assistant Director
7	Daw Kywat Kywat Htun	Assistant Director
8	Daw Chaw Kalayar Shwe	Assistant Director
9	Daw Khine Phyto Wai	Assistant Director
<b>Central Statistical Organization (CSO)</b>		
1	U Than Zaw	Deputy Director General
2	Daw Khin Moe Moe	Director
3	Daw Cing Lun Hwai	Director
4	Daw Hla Myo Khaing	Staff Officer
5	Daw Thein Htet Htet Wai	Deputy Staff Officer
6	Daw Phu Pwint Phyu	Deputy Staff Officer
7	Daw Ei Thandar Soe	Deputy Staff Officer
8	U Yan Myo Aung	Deputy Staff Officer
<b>Natural Resource Governance Institute (NRGI)</b>		
1	U Maw Htun Aung	Country Manager
2	Daw Aye Kyithar Swe	Myanmar Senior Officer
3	U Hosana Chay	Myanmar Officer
<b>Myanmar Alliance for Transparency and Accountability (MATA)</b>		
1	U Ye Thein Oo	Member of MATA
2	U Naing Lin Htut	Member of MATA
3	U Htoo Aung	Program Coordinator (EITI/Communication)
4	U Myo Min Thant	Program Coordinator (EITI)
<b>World Bank Group (WBG)</b>		
1	Mrs. Shona Kirkwood	EITI Implementation Support Coordinator
2	Tinzar Htun	EITI Implementation Support Consultant
<b>Ministry of Commerce - Department of Trade</b>		
1	U Minn Minn	Director General
2	Daw Cho Thet Mu	Deputy Director
3	Daw San San Aye	Assistant Director

No	Name	Position
4	Daw Khaing Khaing Soe	Assistant Director
5	Daw Lae Lae Win	Computer Operator
<b>General Administration Department (GAD)</b>		
1	Daw Mi Mi Win	Director
2	U Phone Myat Min	Director
3	U Win Lwin	Deputy Director
4	U Hein Thu	Deputy Director
5	U Hla Myo	Assistant Director
6	U Aung Ko Ko Lin	Staff Officer
7	Daw Thaw Thaw Han Thar	Staff Officer
<b>Department of Mining (DOM)</b>		
1	U Khin Latt Gyi	Director General
2	U Kyaw Thet	Deputy Director General
3	U Kyaw Zaw Htun	Deputy Director
4	Daw Soe Sandar Maung	Assistant Director
5	Daw Su Pyae Sone Swe	Deputy Staff Officer
6	Daw Thidar	Cashier-1
7	Daw Khin Khin Soe	
<b>Mining Enterprise 1 (ME-1)</b>		
1	Daw Mi Mi Kyawt	Manager
2	Daw Nan Htar Htar Oo	Manager
3	Daw Theingi	Assistant Manager
4	U Soe Naing	Staff Officer
5	Daw Hnin Aye	SE-2
<b>Mining Enterprise 2 (ME-2)</b>		
1	U Ye Myo Min	Assistant General Manager
2	U Lin Lin Khun Koe	Manager
3	Daw Ohnmar Linn	Assistant Manager
4	Daw Ei Mon Cho	Account-1
5	Daw Aye Mya Bo	Superintendent
<b>Myanmar Gems Enterprise (MGE)</b>		
1	U Min Thu	Managing Director
2	U Tun Tun Zaw	Manager
3	U Shwe Win	Manager
4	Daw Kyu Kyu Win	Assistant General Manager
5	Daw Swe Swe Aung	Assistant Manager
6	Daw Kyein Shin Yan	Assistant Manager
7	Daw Kyaut Su Thein	Gem Sorter-1
8	Daw Khwer Nyo Htay Ko	Gem Sorter-1
<b>Myanmar Gems &amp; Jewellery Enterprise Association (MGJEA)</b>		
1	U Zaw Bo Khant	Vice Chairman
2	U Thet Win Tun	CEC
<b>DGSE</b>		
1	U Soe Win	Geologist
2	Daw Nyein Mya	Assistant Geologist
3	Daw Khin San Maw	Staff Officer
<b>MOGE</b>		
1	U Myo Myint Oo	Managing Director
2	U Than Htay Aung	Expert
3	Daw Myint Myint Khaing	Manager

No	Name	Position
4	U Nay Aung	Manager
5	Daw Nu Nu Yi	Deputy Director (Finance)
6	Daw Kyi Kyi Pyone	Advisor
7	U Than Zaw	Account-1
8	Daw Thandar Soe	Cashier-1
9	Daw Sandar Soe	
<b>OGPD</b>		
1	U Than Zaw	Director General
2	U Win Maw	Deputy Director General
3	Daw Win Win Kyu	Deputy Director
4	Daw Su Su Soe	Deputy Director
5	Daw Mu Mu Myint	Deputy Director
6	Daw Su Mi San	Assistant Director
7	Daw Thandar Oo	Staff Officer
8	Daw Kyi Zar Oo	Staff Officer
<b>MPE</b>		
1	U Tayzar Linn	Deputy General Manager
2	U Tin Win Ko	Assistant General Manager
3	Daw San Dar Tint	Manager
4	Daw Pan Pa Pa Lin	Manager
<b>Forest Department (FD)</b>		
1	Dr.Nyi Nyi Kyaw	Director General
2	U Khin Maung Win	Director
3	U Aung Win Tun	Director
4	U Tin Htun	Director
5	U Kyaw Myo Htwe	Deputy Director
6	U Phyo Zin Maung Naing	Assistant Director
7	U Hla Htay Aung	Assistant Director
8	U Htun Htun Wai	Assistant Director
<b>Total E &amp; P Myanmar</b>		
1	Daw May Thet Su Oo	Finance
2	U Win Tin	Head of Contractual and Commercial Support (MSG Member)
<b>MPRL E &amp; P</b>		
1	Daw Yin Yin Aye	Senior Accountant
2	Nang Hseng Noon	Accountant
<b>Myanmar Federation of Mining Association</b>		
1	U Khin Maung Han	Chairman
2	U Thet Naing Win	Secretary (Admin)

## 2.4. Reliability and credibility of data reported

### Initial assessment of assurance procedure

The EITI Standard (2016) requires that a credible assurance process applying international standards should be in place. The approach adopted for the 2017-18 MEITI Report incorporated constraints existing in Myanmar and insufficiencies noticed during the previous reconciliation.

BDO LLP applied its professional judgement to assess the extent to which reliance could be placed on the Existing Controls and Audit Framework (ECAf) of the companies, SOEs and Government Agencies. This step helps in determining the Initial Assessment of Assurance (IAA) for each of the reporting template. In short, when the AF is rated low, the IAA is rated low (i.e. low assurance).



The assessment is based on key factors such as accounting standards applied (international standards, local reliable standards, other standards), existing governance and internal controls, audit standards applied where the entities are audited, and the reliability of the auditor where an auditor has been appointed.

In order to comply with EITI Requirement 4.9 of the EITI Standard (2016) which aims to guarantee the credibility of the data submitted by reporting entities, MSG agreed the following approach for the preparation of the 2017-2018 MEITI report.

#### Extractive companies

The companies selected in the scope were requested to submit their reporting templates:

- signed by a person authorised to represent the extractive company (Chief Financial Officer or Chief Executive Officer/Director); and
- supported by details of payments reported.

All selected companies having their accounts audited were also requested to provide a copy of their audited financial statements.

The IA proposed the option of having external auditors signing-off on the data submitted by the companies selected in the scope. The companies explained that they had no budget available to pay for such attestation reports and the time constraint would not allow reliable audit firms to perform the necessary assurance procedures.

#### Government Agencies and SOEs

BDO LLP and the MSG agreed that for the 2017-18 that all Government Agencies and SOEs selected in the scope should submit a reporting template:

- signed by a person authorised to represent the Government Agency.
- accompanied by payment details reported; and
- certified by the Office of the Auditor General.

## **2.5. Basis and period of reporting**

MSG defined the reporting period as the Fiscal Year (FY). For the 2017/18 MEITI Report, the reconciliation has been carried out on data for FY 2017-2018, which is 1 April 2017 through 31 March 2018.

The revenue streams included in the reconciliation scope relate to only the payments made by companies and revenues received by Government Agencies during FY 2017-2018. The period in which the fees are incurred by companies is not relevant; but rather the date on which the fees were paid and reported.

The reporting currency is Myanmar Kyats (MMK). For payments made in foreign currency, the reporting entities were required to report in the currency of payment. Payments made in foreign currency (US\$ and Euro) have been converted to MMK at the actual rate used by the Government Agency to record the amount received.

Where actual rates were not available or not disclosed by the reporting entities, we applied the average rate for the period as published by the Central Bank of Myanmar. The average rate used were as follows:

- 1 USD is equal to 1,355.82 MMK; and
- 1 Euro is equal to 1587.462 MMK

## 2.6. Procedures for the management and protection of the collected data

In order to protect the confidentiality of the data collected from the reporting entities, the following measures have been applied:

- only the data required by the EITI Standard, Terms of Reference and reconciliation exercise has been requested. Any irrelevant information inadvertently communicated has been deleted and/or destroyed.
- data collected is processed on password-protected laptops and e-mail communications are performed via secure messaging servers.
- reporting entities were requested to address the completed reporting template and any information considered sensitive or confidential directly to the IA's generic email address: (meiti@bdo.co.uk)
- all requests for additional information from Government Agencies or extractive companies for the reconciliation purposes were processed in accordance with the above protocol.

## 3. CONTEXTUAL INFORMATION ON THE EXTRACTIVE SECTOR

### 3.1. Extractive sector in Myanmar

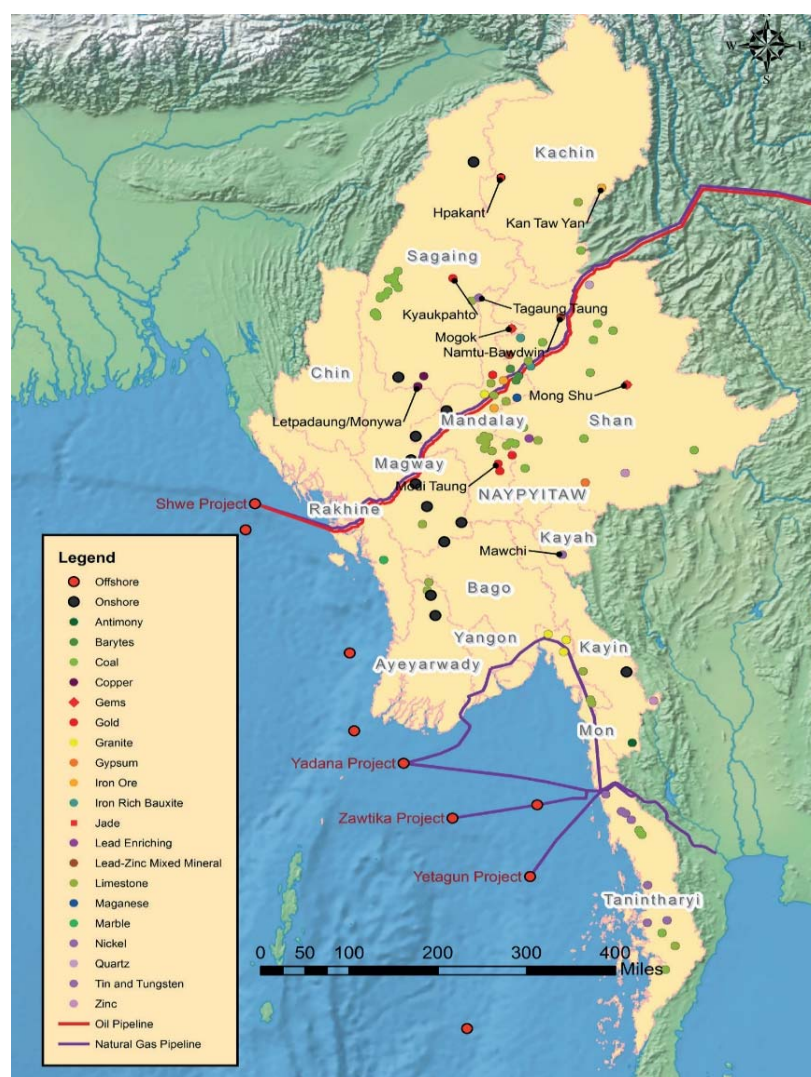
Myanmar is richly endowed with mineral resources and is one the largest producers and exporters of Jade. In 2017, Myanmar produced a variety of mineral commodities, including natural gas, petroleum, coal, copper, precious and semi-precious stones, tin, tungsten, and zinc.

According to the Central Statistical Organization, gas and gemstones accounted for 24% and 5% of exports respectively in the FY April 2017 - March 2018. The Central Statistical Organization reported total sales of gas of US \$3.5 billion in 2017-18. Official revenues from gemstones sales in 2017-18 were estimated at US \$0.7 billion.

The sectors covered by this report are:

- oil and gas study, exploration and production ;
- oil and gas transit and transfer pipelines; and
- solid minerals and mining sector including gems, jade and pearls.

Chart 6: Extractive sector map



## 3.2. Regulatory framework and context of the Oil & Gas sector

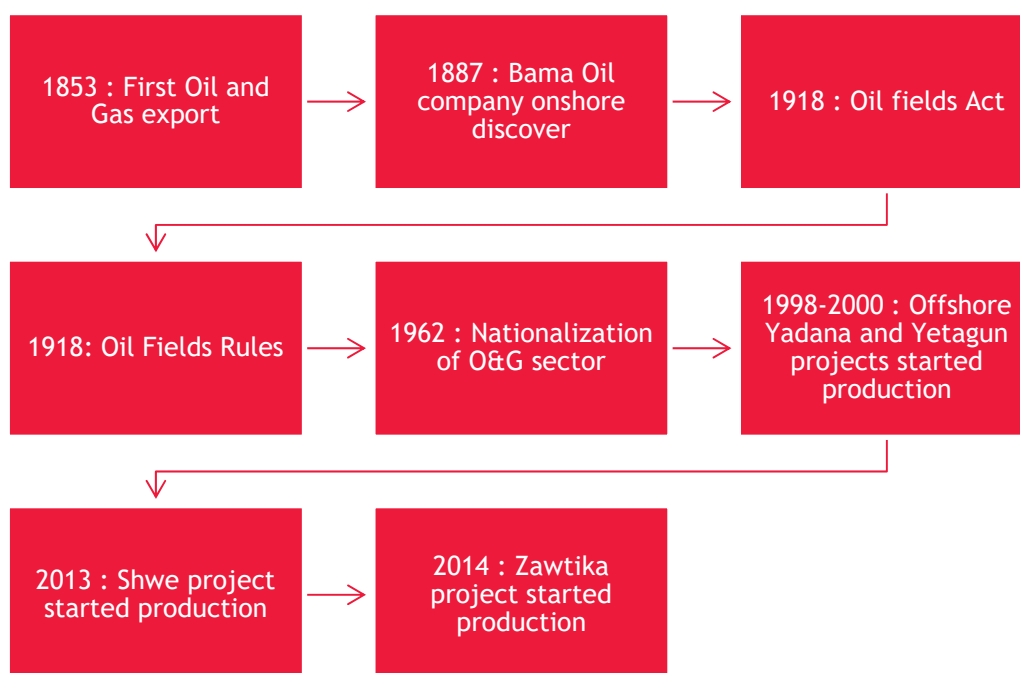
### 3.2.1. INTRODUCTION

#### History of Oil and Gas production:

Myanmar is one of the world's oldest oil producers as its first exports of oil date back to 1853. Myanmar is the second-largest natural gas producer within South East Asia and over the last decade, its production has increased substantially.

The main stages of the Myanmar Oil and Gas history can be summarized in the following chronogram:

Chart 7: Main stages of the Myanmar Oil and Gas history



#### Reserves and cumulate production:

Myanmar has not reached its full oil and gas potential. The oil and gas reserves and cumulated production as reported by MOGE in October 2019 are detailed below:

Table 35: O&G Reserves and cumulate production

Onshore	Initial recoverable	Production	Future recoverable	Unit
Oil	715.57	621.88	93.69	Million bbl.
Gas	2.04	1.66	0.38	TCF

Source MOGE

The oil and gas reserves and cumulated production as reported by MOGE in October 2019 detailed by project are presented below:

Table 36: O&G Reserves and cumulate production per project

Offshore		Initial recoverable	Production	Future recoverable	Unit
Yadanda		6.354	4.96	1.39	TCF
Yetagun	Gas	2.28	2.27	0.01	TCF
	Condensate	59.00	55.60	3.41	Million bbl
Shwe		3.32	0.97	2.35	TCF

Zawitka	1.69	0.60	1.09	TCF
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Source MOGE

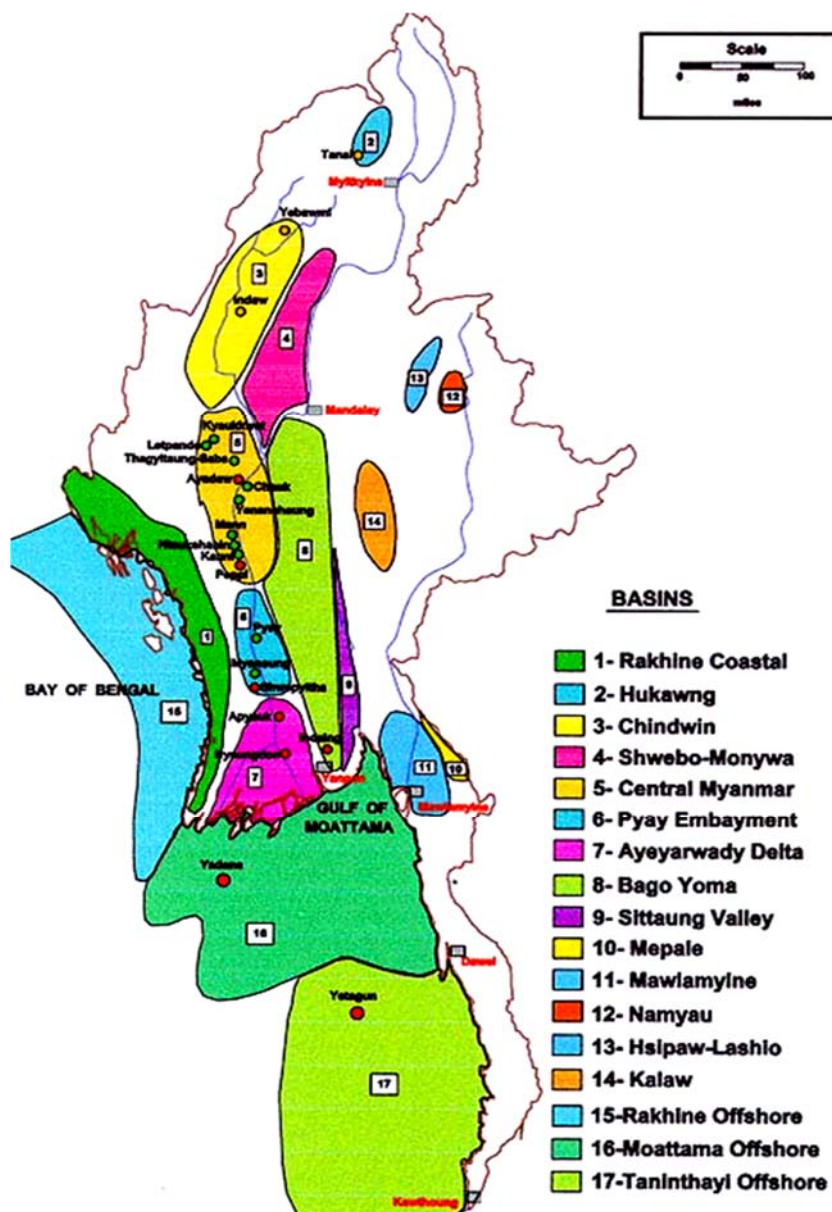
### The Oil and Gas basins and blocks :

According to the information received from the OGPD<sup>12</sup>, a total of 17 sedimentary basins have been identified to date, of which :

- 3 Onshore Tertiary basins in Central, Pyay & Ayeyarwady Delta which are producing oil and gas.
- 3 Offshore Tertiary basins in Moattama, Rakhine & Tanintharyi Offshore which are producing gas and condensate.
- 8 onshore Tertiary frontier basins ; and
- 3 onshore Pre-Tertiary basins.

The map below presents those basins :

Chart 8 : The Oil and Gas basins and blocks



<sup>12</sup> Electricity and energy expo 2019 ( eee-2019 ) Tatmadaw hall, Yangon (29-11-2019 to 01-12-2019)

According to the information received from the OGPD, the total number of blocks as at November 2019 is detailed as below :

**Table 37: Number of available blocks**

Type of blocks	Total number	Number of available blocks
Onshore	53	19
Offshore	51	17

Those blocks can be classified into 5 types:

- PSC blocks (PSC).
- exploration / production blocks (EP).
- improved oil recovery blocks (IOR).
- reactivation of suspended fields (RSF); and
- MOGE reserved blocks (MOGE)

We noted that those blocks are exploited through 3 type of contracts :

- PSC = Production Sharing Contract (PSC).
- IPRC = Improved Petroleum Recovery Contract; and
- PCC = Performance Compensation Contract

we understand that the PSC is the default contract model and since 2014, this type of contract is automatically granted for every new contract signed.

The offshore Yadana (TOTAL, Chevron and PTTEP) and Yetagun (Petronas, PTTEP) natural gas projects started production in 1998 and 2000 respectively under gas sales contracts to the Thai state oil company, PTT. The Daewoo (Daewoo and three partners) natural gas project (also known as “Shwe Gas Project”) started production in 2013. Natural gas produced is sold to China National Petroleum Corporation (CNPC). The offshore Zawtika (PTTEP) natural gas project which started production in March 2014 includes a new 300 km long pipeline (270 km of which will be offshore and only 30 km onshore).

The daily production rate of the Yadana natural gas project is 910 million cubic feet (Mcf); Shwe produces around 500 Mcf; Zawtika produces 360 Mcf; and Yetagon produces over 250 Mcf. There are six deep rigs, nine medium rigs and eleven shallow rigs. The total length of natural gas pipeline in the country is 2,200 miles.

The comprehensive list of blocks is presented in the map in the annex 2 :

#### **Investment in the Oil and gas sector:**

According to the Directorate of Investment and Company Administration (DICA), Myanmar has received more than US\$69 billion in cumulative foreign direct investment (FDI) as of January 2017. The oil and gas sector attracted over US\$22.4 billion in FDI which represents approximately 32% of the total FDI from 154 foreign enterprises with permits. This makes the country’s oil and gas sector one of the top FDI sectors, followed by power, manufacturing, transport and communications. Further exploration may unveil much more substantial reserves. Now that Myanmar is open to international exploration, major international oil companies are making significant investments using updated technology to locate new sources of hydrocarbons.



### 3.2.2. LEGAL FRAMEWORK

Upstream activities (exploration and production) in the oil and gas sector are governed by the following legislations:

- 1918 Oil Fields Act<sup>13</sup>
- 1918 Oil Fields Rules
- 1934 The petroleum Act
- 1951 Oil Fields Labour and Welfare Act<sup>14</sup>
- 1957 Petroleum Resources Development Regulation Act (in the process of revision)
- 1969 Amended Petroleum Resources Development Regulations Act (in the process of revision)
- 1962 Myanmar Petroleum Concession Rules
- 2010 Law Amending the Oilfields Act<sup>15</sup>
- 2017 The Petroleum Hand-dug Well Law<sup>16</sup>

In addition to the above, the Petroleum Resources Development Bill 2019 has been drafted and is currently being discussed in parliament. This will replace the 1957 Petroleum Resources Development Regulation Act.

We also noted that a new Upstream Oil and gas sector law is drafted and under discussion in the parliament.

Although the terms and conditions of production sharing contracts (PSCs) largely govern exploration and production (E&P) operations in the above-mentioned oilfields, the Labour and Welfare Act 1951 is of continued importance to contractors and their service companies. Environmental legislations have become part of the legal framework regulating oil activities.

Of equal importance in the oil and gas sector are the State-Owned Economic Enterprises Law 1989 (under which the Myanmar Oil and Gas Enterprise (MOGE) is assigned responsibility for the E&P sector under PSCs with private companies), the Myanmar Investment Law (2016) (MIL) (formerly the Foreign Investment Law (2012) (FIL), repealed by MIL), Myanmar Investment Rules and MIC Notification (under which permits are granted by the Myanmar Investment Commission (MIC) to approve terms and conditions of draft PSCs).

The old petroleum laws refer mainly to rights characterised as concessions. Although the above-mentioned laws relating to petroleum are still applicable, in practice investors generally enter into PSCs, performance compensation contracts (PCCs), Improved Petroleum Recovery (IPRs), and reactivation agreements.

### 3.2.3. Institutional framework

The Ministry of Energy (MOE) was established on 12 April 1985 through the Order No. (5/ 85) with the Minister Office, the Energy Administration Department, the Myanma Oil Corporation, the Petrochemical and Gas Corporation, the Petroleum Products Corporation and the Electricity Corporation. The Ministry of Electricity was established on 16 November 1997 through issuance of Letter No. (40/ 97 AhPhaYa 97 (3) and the Ministry of Energy was thereafter restructured with the Minister's Office, the Energy Administration Department, the Myanma Oil and Gas Enterprise (MOGE), the Myanma Petrochemical Enterprise and the Myanma Petroleum Products Enterprise. The Ministry of Electricity and Energy (MOEE) was formed on 01 April 2016 combining the Ministry of Electric Power (MOEP) and the Ministry of Energy (MOE)<sup>17</sup>.

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<sup>13</sup>[https://www.myanmarconstitutionaltribunal.org.mm/lawdatabase/sites/default/files/myanmar\\_code/2016/04/1-1918%20The%20Oilfields%20Act.pdf](https://www.myanmarconstitutionaltribunal.org.mm/lawdatabase/sites/default/files/myanmar_code/2016/04/1-1918%20The%20Oilfields%20Act.pdf)

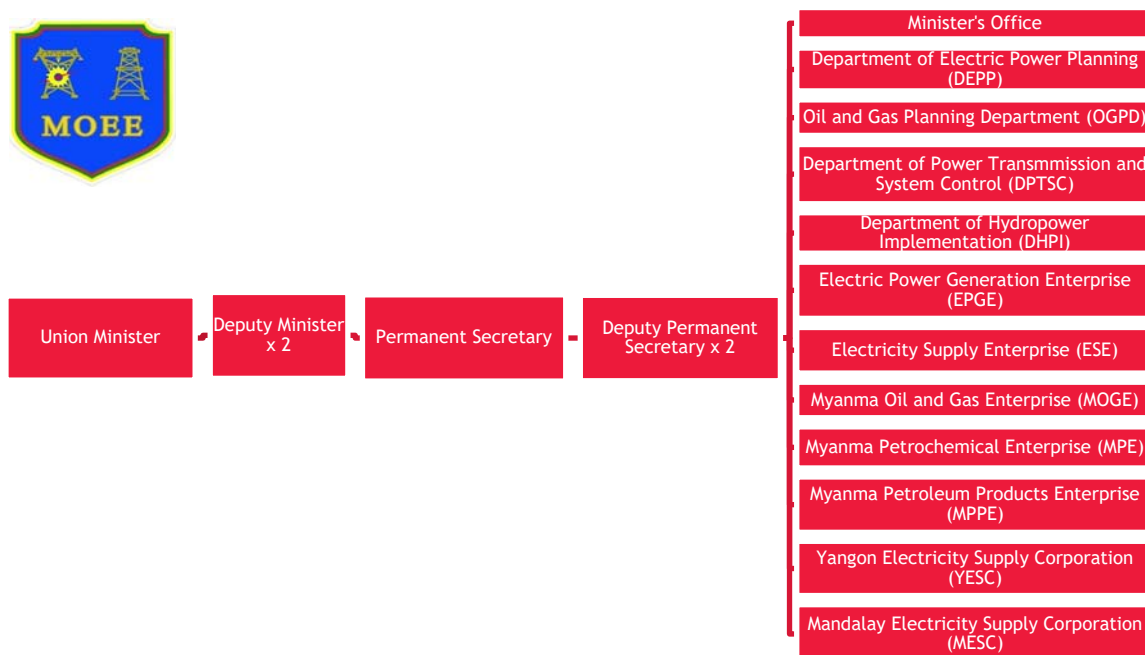
<sup>14</sup>[http://www.myanmar-law-library.org/?page=pdfjs&id\\_document=83#page=147](http://www.myanmar-law-library.org/?page=pdfjs&id_document=83#page=147)

<sup>15</sup>[http://www.burmalibrary.org/docs18/2010-12-31-SPDC\\_Law2010-34\\_Law\\_Amending\\_the\\_Oilfields\\_Act\\_1918-oag-en.pdf](http://www.burmalibrary.org/docs18/2010-12-31-SPDC_Law2010-34_Law_Amending_the_Oilfields_Act_1918-oag-en.pdf)

<sup>16</sup><http://www.moe.gov.mm/en/ignite/page/98>

<sup>17</sup><http://www.moe.gov.mm/en/ignite/page/3>

Chart 9 : Structure of the MOEE



MoEE is the primary Government Agency responsible for the electricity and energy sector. MoEE has oversight of three State Owned Enterprises:

- **Myanmar Oil and Gas Enterprise (MOGE):** responsible for exploration/production and land transmission of oil and gas through a 2,488 km onshore transmission pipeline network and to oversee Production Sharing contracts (PSCs) entered into with private investors.
- **Myanmar Petrochemical Enterprise (MPE):** has the oversight of three refineries, five urea fertilizer plants and a number of other processing plants; and
- **Myanmar Petroleum Products Enterprise (MPPE):** manages retail and wholesale distribution of petroleum products.

In addition to these enterprises, the MoEE organisation chart includes the Oil and Gas Planning Department (OGPD) which is responsible for energy policy formulation, coordination and the discussion of Energy Development Programmes. OGPD is also responsible with MOGE for tendering oil and gas blocks (onshore, shallow water offshore, deep water offshore) in Myanmar and for managing contracts, exploration and production and sale of oil and gas.

MOGE and OGPD have a regulator and an operator role. MoEE and MIC also have regulatory roles.

Under the electricity sector, there are three departments, namely: the Department of Electric Power Planning (DEPP), the Department of Electric Power Transmission and System Control (DPTSC) and the Department of Hydro Power Implementation (DHPI).

There are two enterprises: Electric Power Generation Enterprise (EPGE) and Electricity Supply Enterprise (ESE).

Finally, there are two corporations: Yangon Electricity Supply Corporation (YESC) and Mandalay Electricity Supply Corporation (MESC)<sup>18</sup>.

In order to ensure the development of the energy and electricity sectors, the National Energy Management Committee was set up in January 2013 by the President's Office notification No (12/2013). It is chaired by the Minister of Energy and comprises MOGE, the Ministry of Energy and the 10 other government institutions involved in energy development and aims to streamline the country's national energy policy. This committee has been dissolved since 2016 April by the new government.

<sup>18</sup> <http://www.moee.gov.mm/en/ignite/page/3>



### 3.2.4. CONTRACT TYPES

The Oil and Gas sector in Myanmar is governed by three types of contracts, as described below:

- Production Sharing Contracts (PSCs): for offshore and onshore projects
- Performance Compensation Contracts (PCC): for onshore projects; and
- Improved Petroleum Recovery Contracts (IPRs): for onshore projects.

The main clauses of the three types of contracts are described as below:

**Table 38 : Main clauses of Oil and Gas contracts**

Main clause/Type of contract	Production Sharing Contracts (PSCs)	Performance Compensation Contract (PCC)	Improved Petroleum Recovery Contract (IPR)
Signature bonus	Payment within 30 days of signing PSC [amended to 30 days after start of Exploration Period]	Contractor shall not be obligated to pay any annual bonus, rental, minimum payment or signing bonus.	(Payment within 30 days after the commencement of the Pilot Project Period)
Royalty	12.5% of available petroleum (10% for PSC up to 2012)	NA	12.5% of all Incremental Petroleum.
Cost recovery	Limited to 60% in water depth of 2,000 feet or less; 70% for water depth exceeding 2,000 feet	Maximum 40% of all Incremental Petroleum.	Maximum 40% of all Incremental Petroleum.
Production split	Progressive per rate of production 60/55% to 85/80% for crude oil and 60/55% to 90/80% for natural gases	Incremental Crude Oil	Incremental Crude Oil
Production bonus	Progressive per rate of production. USD 1 million to 10.0 million	Contractor shall not be obliged to pay any annual bonus, rental, minimum payment or signing bonus	Contractor shall not be obliged to pay any annual bonus, rental, minimum payment or signing bonus
Domestic requirements	20% of crude oil and 25% of natural gas of contractor's share of profit realised from the sale of petroleum on the domestic market, at 90% of fair market prices	10% of Crude Oil and 15% of Natural Gas of contractor's share of profit petroleum at 75% of Fair Market Prices.	10% of Crude Oil and 15% of Natural Gas of contractor's share of profit petroleum at 75% of Fair Market Prices.
Training fund	USD 25,000 during exploration USD 50,000 during production	Initial Joint Study Period = 10,000 US\$ Pilot Project Period = 50,000 US\$ per Year Production Period = 50,000 US\$ per Year If any average daily gross production rate exceeds 30,000 BOPD, Production Period = 100,000 US\$ per Year	Initial Joint Study Period = 10,000 US\$ Pilot Project Period = 50,000 US\$ per Year Production Period = 50,000 US\$ per Year If any average daily gross production rate exceeds 30,000 BOPD, Production Period = 100,000 US\$ per Year
State participation	Up to 20% with MOGE option to increase up to 25%	15 % undivided interest.	15 % undivided interest.
Other	CSR Obligations. Contractor must include a company registered in Myanmar	MOGE and CONTRACTOR shall collaborate to implement the Extractive Industries Transparency Initiative.	MOGE and CONTRACTOR shall collaborate to implement the Extractive Industries Transparency Initiative.

### 3.2.5. Main oil and gas projects

#### Offshore project

##### Yetagun project

The Yetagun gas field is an offshore gas field in the Andaman Sea, covering an area of approximately 24,130 km<sup>2</sup>. Following the Yadana project, the US\$700 million Yetagun project was the second natural gas offshore project in Myanmar.

The field is estimated to hold three trillion cubic feet of gas and 80 million barrels of condensate in reserves.

The Yetagun field was discovered in December 1992. The field development activities started in 1996, construction of the pipeline and associated facilities were carried out in 1998 and 1999 and commercial production started in May 2000. The field is expected to continue production until 2030.

The percentage of shares held by every shareholder in this project is set out below:

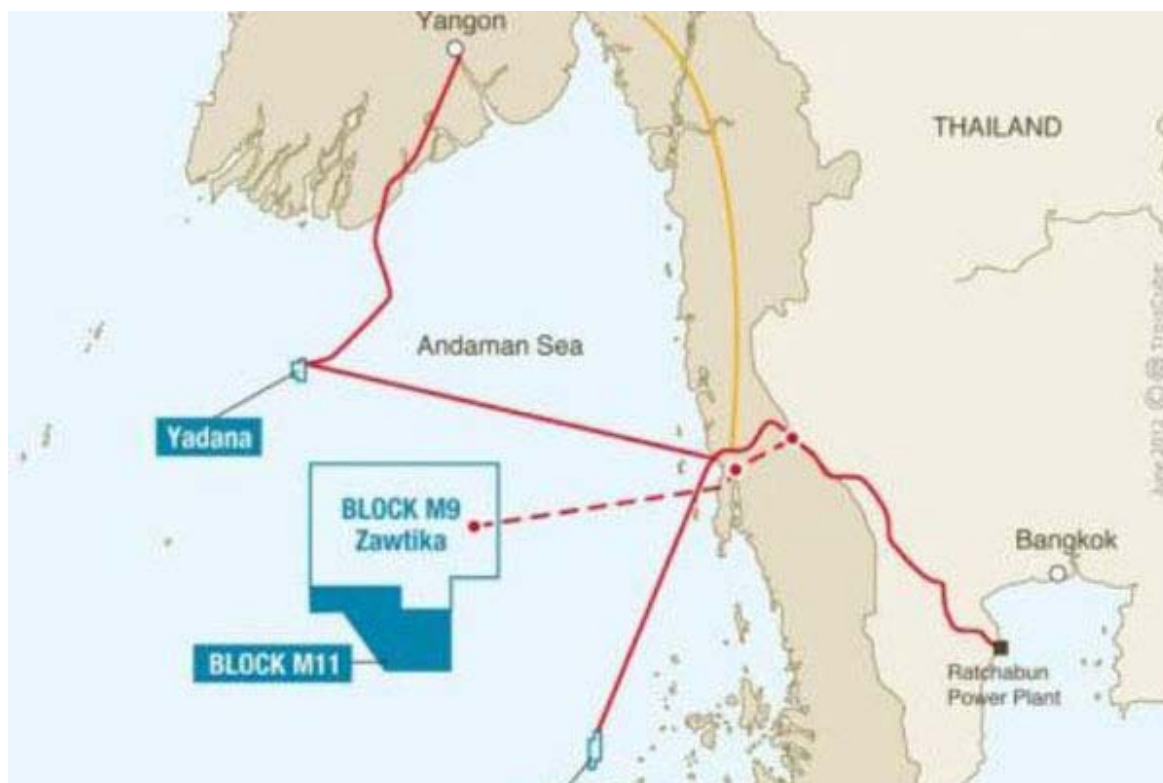
**Table 39: Percentage of shares in Yetagun project**

Project	Operator	Partners	% of interest
Yetagun project	PCML		40.91%
		MOGE	20.45%
		PTTEP International Limited	19.32%
		Nippon Oil Exploration	19.32%
Total			100.00%

Source: EITI data

Natural gas produced from the field is supplied to the Petroleum Authority of Thailand (PTT) through the Taninthayi Pipeline operated by Taninthayi Pipeline Company (TPC), whereas the condensate from the field is stored in the Yetagun FSO vessel and sold to both domestic and international customers.

**Chart 10: Yetagun project pipeline**



According to the data reported by TPC, details of the pipeline are set out below:

Pipeline Information	Pipeline Name	Pipeline Length	Pipeline Diameter	Location
	Taninthayi Pipeline	68 km	24 inches	Yetagun Gas Field Myanmar Offshore and Thai-Myanmar border

The total volume of gas transported through this pipeline are as follows:

**Table 40: The total volume of gas transported through the TPC pipeline**

Date/month	Volume transported	Unit	Tariff rates	Project	Tariff in USD
2017-04-01	5,860,275	MMBTU	36% of Gas Revenue	Yetagun	13,599,753
2017-05-05	7,091,608	MMBTU	36% of Gas Revenue	Yetagun	16,457,268
2017-06-08	6,457,359	MMBTU	36% of Gas Revenue	Yetagun	14,981,806
2017-07-12	6,951,172	MMBTU	36% of Gas Revenue	Yetagun	16,563,235
2017-08-15	6,379,229	MMBTU	36% of Gas Revenue	Yetagun	15,453,095
2017-09-18	5,951,449	MMBTU	36% of Gas Revenue	Yetagun	14,456,271
2017-10-22	5,741,405	MMBTU	36% of Gas Revenue	Yetagun	14,549,571
2017-11-25	6,150,737	MMBTU	36% of Gas Revenue	Yetagun	15,586,879
2017-12-29	5,614,869	MMBTU	36% of Gas Revenue	Yetagun	14,228,909
2018-01-18	4,838,060	MMBTU	36% of Gas Revenue	Yetagun	12,679,589
2018-02-18	4,448,052	MMBTU	36% of Gas Revenue	Yetagun	11,657,455
2018-03-18	5,180,110	MMBTU	36% of Gas Revenue	Yetagun	13,576,033
<b>Total</b>	<b>70,664,326</b>				<b>173,789,864</b>

### Fiscal regime

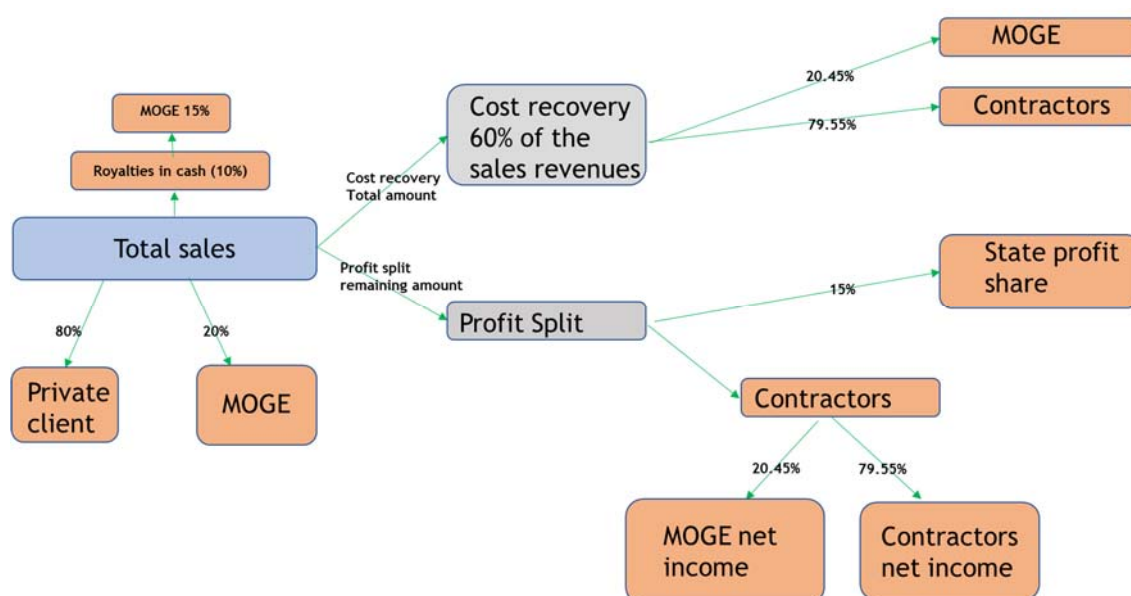
The data received from PCML indicates that the company is exploiting the Yetagun blocks under the following contracts:

**Table 40: List of contracts of Yetagun blocks**

Block Number	Onshore/Offshore	Contract Type	Activity Type	Location
M-12	Shallow Water Offshore	PSC	Production	Andaman Sea
M-13	Shallow Water Offshore	PSC	Production	Andaman Sea
M-14	Shallow Water Offshore	PSC	Production	Andaman Sea

Following discussions held with MOGE and Total management, we understand that the fiscal regime related to those contracts can be explained as follows:

**Chart 11 : Yetagun project fiscal regime chart**



- In this contract, the company PCML performs the gas sales then allocate to the partners their share according to their percentage shareholding, as included in the agreement.
- The royalties in cash is paid quarterly by PCML to the different partners.
- 10% of the total sales is allocated to MOGE at a discounted price.

## Production and exports

The total production of the Yetagun project as reported by PCML is detailed below:

**Table 41: Yetagun production volume**

Block	For the month ending	Production Volume	
		Crude Oil (barrel)	Gas (Mscf)
M-12/ M13/ M14	30/04/2017	135,431	6,751
	31/05/2017	161,431	8,122
	30/06/2017	147,149	7,426
	31/07/2017	153,962	7,995
	31/08/2017	147,582	7,366
	30/09/2017	136,713	6,903
	31/10/2017	129,531	6,647
	30/11/2017	140,705	7,102
	31/12/2017	128,243	6,485
	31/01/2018	108,693	5,564
	28/02/2018	98,362	5,084
	31/03/2018	115,981	5,962
	<b>Total</b>	<b>1,603,783</b>	<b>81,407</b>

Based on the data reported by PCML, total exports of the Yetagun project in 2017-2018 were detailed as follows:

**Table 42: Yetagun exports volume**

Block	For the month ending	Export Volume			Export Value (USD)	
		Crude Oil (barrel)	Gas (Mscf)	Gas (mmbtu)	Crude Oil	Gas
M-12/ M13/ M14	30/04/2017	367,435	6,161	5,860,275	19,846,985	37,777,090
	31/05/2017		7,465	7,091,608		45,714,633
	30/06/2017	430,339	6,811	6,457,359	20,988,919	41,616,128
	31/07/2017		7,336	6,951,172		46,008,987
	31/08/2017		6,733	6,379,229		42,925,265
	30/09/2017	412,923	6,283	5,951,449	24,026,338	40,156,309
	31/10/2017		6,042	5,741,405		40,415,474
	30/11/2017		6,488	6,150,737		43,296,885
	31/12/2017	430,473	5,921	5,614,869	29,264,415	39,524,748
	31/01/2018		5,084	4,838,060		35,221,080
	28/02/2018		4,672	4,448,052		32,381,818
	31/03/2018	183,636	5,450	5,180,110	12,612,685	37,711,204
	<b>Total</b>	<b>1,824,806</b>	<b>74,447</b>	<b>70,664,326</b>	<b>106,739,343</b>	<b>482,749,621</b>

## Shwe Natural Gas Project

The Shwe Natural Gas project consists of the Shwe, Shwe Phyu and Mya offshore gas fields, located in blocks A-1 and A-3 of the Bay of Bengal, Myanmar.

The project has been developed by a consortium of six companies, led by POSCO a subsidiary Daewoo International, which is also the operator of the project.

The percentage shareholding of every partner in this project is set out in the table below:

**Table 43: List of percentage shareholding of Shwe project**

Project	Operator	Partners	% of interest
The Shwe Natural Gas project	Daewoo		51%
		MOGE	15%
		ONGC Videsh	17%
		KOGAS	9%
		Gail India	8%
Total			100.00%

The first production gas from the Shwe project took place in July 2013 from the Mya field and commercial production started in August the same year.

Production from the Shwe gas field started in January 2014, as a result of which, the production by the end of 2014 was expected to reach 500 million cubic feet of gas a day.

### Fiscal regime

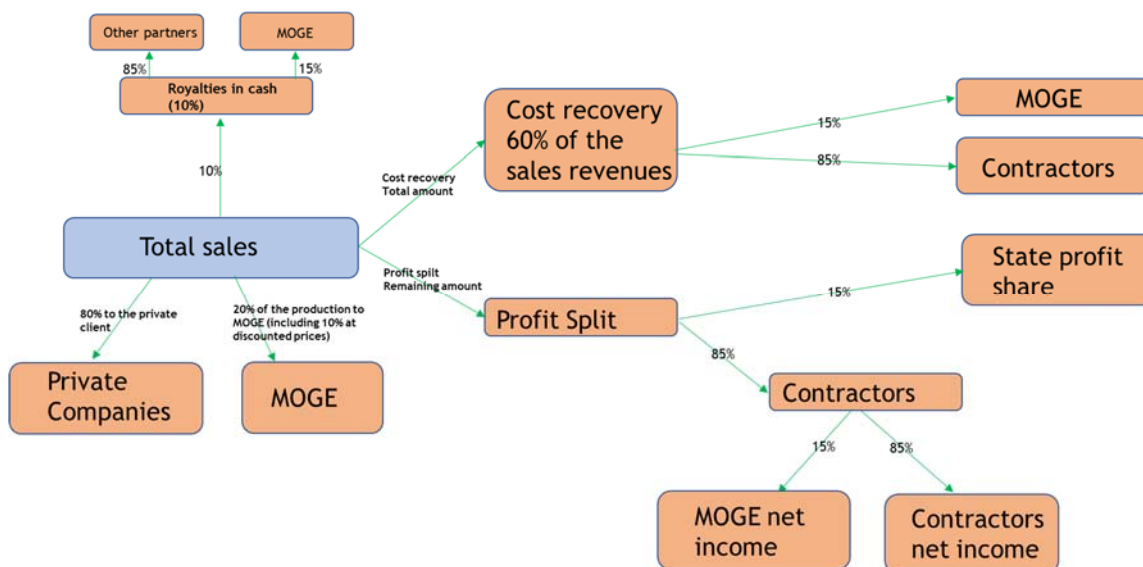
According to the information received from Daewoo Posco, the company is exploiting the Shwe project under the following contracts:

**Table 44: List of contracts of Shwe project**

Block Number	Onshore/Offshore	Contract Type	Activity Type	Commodity	Location	Region
A-1	Offshore	PSC	Production	Natural Gas	Kyaukpyu	Rakhine State
A-3	Offshore	PSC	Production	Natural Gas	Kyaukpyu	Rakhine State

According to discussions held with MOGE and the Daweoo management, we understand that the fiscal regime related to those contracts can be set out as follows:

**Chart 12 : Shwe project fiscal regime chart**



According to discussions held with MOGE and Daewoo Posco management we understand the following:

- royalties are paid in cash to partners every monthly. The total amount is 10% of the monthly sales (15% to MOGE and 85% to the remaining partners). In the 4<sup>th</sup> month, the partners repay the royalties to MOGE; and
- every month the operator performs the cash call in order to cover its production expenses. These amounts are repaid as cost recovery (after deduction of the royalties in cash). The

expenses depend on the production, but the cost recovery is always 60% of the sales revenue.

### Production and exports

Based on the information reported by Daewoo Posco, the total production of project Shwe in 2017-2018 were as follows:

Block A-1:

**Table 44: Total production of Shwe project (block A1)**

Block	For the month ending	Gas Production Volume (Mscf)
A-1	30/04/2017	4,744
	31/05/2017	6,769
	30/06/2017	9,605
	31/07/2017	3,592
	31/08/2017	3,565
	30/09/2017	6,502
	31/10/2017	10,524
	30/11/2017	10,368
	31/12/2017	11,027
	31/01/2018	11,177
	28/02/2018	9,984
	31/03/2018	9,510
Total		97,367

Block A-3:

**Table 44: Total production of Shwe project (block A3)**

Block	For the month ending	Gas Production Volume (Mscf)
A-3	30/04/2017	3,980
	31/05/2017	3,567
	30/06/2017	7,028
	31/07/2017	3,599
	31/08/2017	4,642
	30/09/2017	5,575
	31/10/2017	6,759
	30/11/2017	7,572
	31/12/2017	8,798
	31/01/2018	8,599
	28/02/2018	7,503
	31/03/2018	7,033
Total		74,656

Based on the data reported by Daewoo Posco, the total exports of the Shwe project in 2017 were as follows:

**Block A-1:**

**Table 45: Total exports of Shwe project (block A1)**

Block	For the month ending	Export Volume		Export Value (USD)	Destination (Country)
		Gas (Mscf)	Gas (mmbtu)	Gas	
A-1	30/04/2017	3,850	3,893,169	24,270,013	China
	31/05/2017	5,452	5,512,923	34,367,563	China
	30/06/2017	7,885	7,974,322	49,711,920	China
	31/07/2017	2,423	2,450,096	15,659,297	China
	31/08/2017	2,787	2,818,558	18,014,249	China
	30/09/2017	5,742	5,806,297	37,109,783	China
	31/10/2017	9,317	9,421,753	61,383,662	China
	30/11/2017	8,997	9,097,471	59,270,935	China
	31/12/2017	9,136	9,238,188	59,416,864	China
	31/01/2018	9,339	9,442,967	62,606,871	China
	28/02/2018	8,336	8,428,873	55,883,429	China
	31/03/2018	7,935	8,023,548	53,196,122	China
Total		81,199	82,108,164	530,890,709	

**Block A-3:**

**Table 46: Total exports of Shwe project (block A3)**

Block	For the month ending	Export Volume		Export Value (USD)	Destination (Country)
		Gas (Mscf)	Gas (mmbtu)	Gas	
A-3	30/04/2017	3,233	3,269,441	20,381,697	China
	31/05/2017	2,886	2,918,897	18,196,402	China
	30/06/2017	5,771	5,836,206	36,382,909	China
	31/07/2017	2,792	2,823,578	18,046,337	China
	31/08/2017	3,206	3,241,953	20,720,296	China
	30/09/2017	4,096	4,142,460	26,475,703	China
	31/10/2017	5,988	6,055,357	39,451,253	China
	30/11/2017	6,548	6,621,327	43,138,609	China
	31/12/2017	7,293	7,374,055	47,450,584	China
	31/01/2018	7,186	7,265,518	48,170,385	China
	28/02/2018	6,268	6,338,095	42,021,572	China
	31/03/2018	5,873	5,938,569	39,372,712	China
Total		61,140	61,825,457	399,808,459	

## Overview of the Myanmar-China Oil & Gas Pipelines<sup>19</sup>

The Myanmar-China Oil & Gas Pipelines is an international cooperation project. The Myanmar-China Crude Oil Pipeline is jointly invested and constructed by SEAP and MOGE; their joint venture, South-East Asia Crude Oil Pipeline Company Limited (SEAOP), is responsible for its operation and management. While the Myanmar-China Gas Pipeline Project is jointly invested and constructed by SEAP, MOGE, POSCO DAEWOO, ONGC VIDESH, GAIL and KOGAS; their joint venture, South-East Asia Gas Pipeline Company Limited (SEAGP), is responsible for its operation and management.

### Myanmar-China Crude Oil Pipeline:

The 771-kilometer long pipeline extends from Madè Island on the west coast of Myanmar to Ruili in the south western Chinese province of Yunnan, running through Rakhine State, the Magwe region, the Mandalay region, and Shan State. The Pipeline is 813 mm in diameter and is able of delivering 12Mt/a upon completion of the Phase I project, and 22Mt/a upon the completion of the Phase II project, with a total annual delivery of 2 million tons to Myanmar. A 300,000-ton crude oil terminal has been built, with an annual capacity of 22 million tons. On 10 April 2017, the Myanmar-China Crude Pipeline project was officially launched into operation.

### Myanmar-China Gas Pipeline

The Myanmar-China Gas Pipeline starts at Ramree Island on the western coast of Myanmar and ends at Ruili in China's Yunnan Province. Running in parallel with the Myanmar-China Crude Oil Pipeline, the crude pipeline is 1,016 mm in diameter over a distance of 793 km in Myanmar. It can deliver 5.2 billion m<sup>3</sup> per year upon completion of the Phase I project, and 12 billion m<sup>3</sup> per year upon completion of the Phase II project. Pursuant to the cooperation agreement, four gas off-take stations (Kyaukphyu, Yenangyaung, Taungtha and Mandalay) were established to unload less than 20% of the pipeline's total delivery in Myanmar. On 28 July 2013, the Myanmar-China Gas Pipeline became operational and started to deliver natural gas to the Myanmar market through its off-take stations.

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<sup>19</sup> <http://csr.cnpc.com.cn/cnpccsr/xhtml/PageAssets/mdbg2016-en.pdf>



The map<sup>20</sup> below details the itinerary of the 2 pipelines:

Chart 13: Shwe project pipelines



### Volume of gas transported

The quantity of gas transported by SEAGP in 2017-2018 were as follows:

Table 47: Total gas transported by SEAGP

Date/month	Volume transported	Unit	Tariff in USD
01/04/2017	9,654	MSCF	22,262,142
01/05/2017	9,167	MSCF	21,564,512
01/06/2017	16,258	MSCF	39,497,343
01/07/2017	6,944	MSCF	15,913,555
01/08/2017	7,719	MSCF	18,224,891
01/09/2017	11,430	MSCF	28,422,948
01/10/2017	16,941	MSCF	43,245,333
01/11/2017	17,603	MSCF	44,297,003
01/12/2017	19,513	MSCF	48,175,221
01/01/2018	19,323	MSCF	43,773,500
01/02/2018	17,175	MSCF	38,767,694
01/03/2018	17,002	MSCF	37,840,817
<b>Total</b>	<b>168,730</b>		<b>401,984,959</b>

<sup>20</sup> <https://oilprice.com/Energy/Crude-Oil/Myanmar-Oil-Pipeline-Could-Bring-Cheaper-Crude-To-China.html>

## Volume of oil transported

The volume of oil transported by SEAOP in 2018 were as follows:

**Table 48: Total Oil transported by SEAOP**

Date/month	Volume transported	Unit	Tariff rates	Tariff total
01/02/2018	749,740	MTS	31.56	23,661,794
01/03/2018	715,266	MTS	31.56	22,573,794
<b>Total</b>	<b>1,465,006</b>			<b>46,235,588</b>

## Yadana project

Total signed the Yadana production sharing contract with MOGE in July 1992 and operates the field with a 31.24% interest with the State-Owned Myanmar Oil and Gas Enterprise (MOGE) holding 15% interest.

The Yadana gas field is located in the Andaman Sea, approximately 60 kilometres offshore the nearest landfall in Myanmar. This major energy resource contains more than 5.3 trillion cubic feet (150 billion cubic metres) of natural gas, with an expected field life of 30 years. Commercial production began in the year 2000 and production averaged more than 21.5 million cubic metres per day in 2007.

The shareholding percentage hold by the partners in this project is set out below:

**Table 49: Shareholders of Yadana project**

Project	Operator	Partners	% of interest
The Yadana project	TOTAL E&P		31.24%
	Unocal Myanmar Offshore Co., Ltd		28.26%
	PTTEP		25.50%
	MOGE		15.00%
<b>Total</b>			<b>100.00%</b>

The gas is supplied to Thai power plants and is also sold on Myanmar's domestic market. The gas is transported onshore via a 346-kilometre subsea pipeline. A 63-kilometer onshore pipeline then takes it to the Thai border.

The Pipeline is managed by Mottama Gas Transportation Company (Yangon Branch) (MGTC), details of which are set out below:

Pipeline Length	Pipeline Diameter	Site	Location
410 Km	36"	Extending from offshore blocks M5-M6 to Myanmar-Thailand Boarder at Ban Tong	Tanintharyi

The map below shows the route followed by the pipeline from the production area to the connection to export.

Chart 14: Yadana project pipeline



Based on the data reported by MGTC, the volume transported is detailed as below:

Table 49: Volume transported by MGTC

Date/month	Volume transported	Unit	Tariff rates	Tariff in USD
April 2017	14,740	MSCF	\$/MMBTU	26,618,278
May 2017	19,329	MSCF	\$/MMBTU	35,474,277
June 2017	18,604	MSCF	\$/MMBTU	30,305,747
July 2017	20,562	MSCF	\$/MMBTU	34,139,394
August 2017	19,960	MSCF	\$/MMBTU	34,176,046
September 2017	18,739	MSCF	\$/MMBTU	33,062,810
October 2017	17,293	MSCF	\$/MMBTU	35,011,715
November 2017	15,720	MSCF	\$/MMBTU	31,844,991
December 2017	16,520	MSCF	\$/MMBTU	36,252,608
January 2018	14,638	MSCF	\$/MMBTU	30,710,952
February 2018	14,199	MSCF	\$/MMBTU	32,274,009
March 2018	20,900	MSCF	\$/MMBTU	46,028,617
Total	211,205			405,899,445

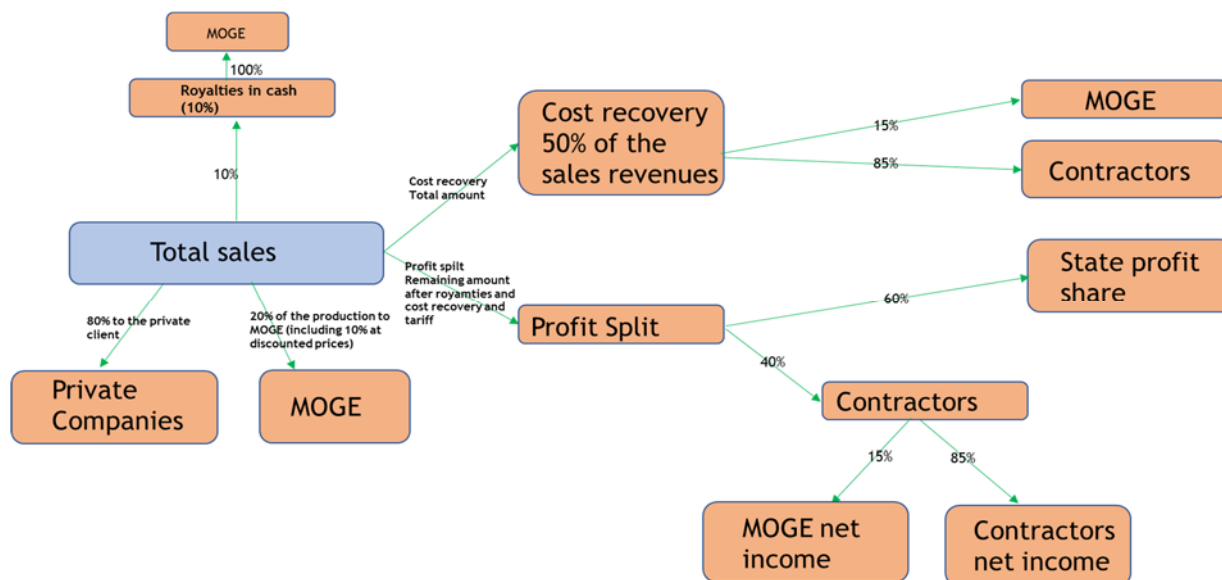
## Fiscal regime

Based on the data received from Total E&P Myanmar, the company is exploiting the Yadana project under the following contracts:

Block Number	Onshore/ Offshore	Contract Type	Activity Type	Commodity 1	Area (Km2)	Location	Region
M5-M6	Offshore	PSC	Production	Natural Gas	26,141	Mottama Offshore	Tanintharyi

According to our discussion with the Total E&P Myanmar management, we understand that the fiscal regime related to those contracts can be explained as below :

Chart 15 : Yadana project fiscal regime chart



## Production and exports

According to the information reported by Total E&P, the total production of the project Yadana were as follows:

Table 50: Total production of Yadana project

Block	For the month ending	Gas Production Volume (Mscf)	Production Value (USD)
M5-M6	Apr 2017	20,646	96,558,068
M5-M6	May 2017	26,443	123,669,777
M5-M6	Jun 2017	23,887	111,716,327
M5-M6	Jul 2017	26,194	130,853,690
M5-M6	Aug 2017	25,416	126,965,431
M5-M6	Sep 2017	23,865	119,221,474
M5-M6	Oct 2017	22,923	118,824,665
M5-M6	Nov 2017	21,230	110,049,075
M5-M6	Dec 2017	22,016	114,123,647
M5-M6	Jan 2018	20,801	111,546,495
M5-M6	Feb 2018	20,668	110,833,215
M5-M6	Mar 2018	27,692	148,499,248
Total		281,782	1,422,861,113

Based on the data reported by Total E&P, the total exports of the Yadana project in 2017 were as follows:

**Table 51 : Total exports of Yadana project**

Block	For the month ending	Export Volume		Export Value (USD)	Destination (Country)
		Gas (Mscf)	Gas (MMBtu)		
M5-M6	Apr 2017	14,740	10,642,203	68,602,833	Thailand
M5-M6	May 2017	18,148	13,219,852	85,219,132	Thailand
		1,181	860,573	-	Make up gas (*)
M5-M6	Jun 2017	16,520	12,116,483	78,106,484	Thailand
		2,084	1,528,251	-	Make up gas
M5-M6	Jul 2017	17,515	12,972,373	87,986,417	Thailand
		3,047	2,256,604	-	Make up gas
M5-M6	Aug 2017	17,515	12,986,300	88,080,878	Thailand
		2,445	1,813,166	-	Make up gas
M5-M6	Sep 2017	16,950	12,563,290	85,211,771	Thailand
		1,789	1,326,196	-	Make up gas
M5-M6	Oct 2017	17,293	12,818,700	90,234,675	Thailand
M5-M6	Nov 2017	15,720	11,659,280	82,073,170	Thailand
M5-M6	Dec 2017	16,520	12,255,734	86,271,788	Thailand
		-	-	7,161,002	Make up gas
M5-M6	Jan 2018	14,638	10,872,288	79,150,257	Thailand
M5-M6	Feb 2018	14,148	10,549,813	76,802,639	Thailand
M5-M6	Mar 2018	20,672	15,328,767	111,593,424	Thailand
<b>Total</b>		<b>210,926</b>	<b>155,769,873</b>	<b>1,026,494,470</b>	

(\*) Make up Gas means the portion of the quantity of Contract Gas which Buyer has paid for but not taken in the relevant Month, and where the context so requires, means the aggregate of such quantities of Contract Gas credited to Buyer in respect of prior Months less any quantities of Contract Gas taken by Buyer.

Based on the data reported by Total E&P, the total local sales of the Yadana project in 2017-2018 were as follows:

Block	For the month ending	Export Volume		Export Value (USD)
		Gas (mscf)	Gas (mmbtu)	
M5-M6	Apr 2017		5,215	3,724,974
M5-M6	May 2017		6,775	4,849,771
M5-M6	Jun 2017		4,847	3,516,454
M5-M6	Jul 2017		5,121	3,715,946
M5-M6	Aug 2017		4,870	3,502,212
M5-M6	Sep 2017		4,756	3,422,134
M5-M6	Oct 2017		5,047	3,628,836
M5-M6	Nov 2017		5,050	3,623,164
M5-M6	Dec 2017		4,943	3,570,081
M5-M6	Jan 2018		5,716	4,132,922
M5-M6	Feb 2018		6,108	4,402,189
M5-M6	Mar 2018		6,440	4,625,704
<b>Total</b>			<b>64,889</b>	<b>46,714,387</b>

### Zawtika project<sup>21</sup>

The Zawtika project includes the development of the Zawtika, Kakonna and Gawthaka fields, located in Blocks M9 and Small North East Part of M11, offshore of Myanmar. The project is spread across an area of 12,306 square kilometres.

The Petroleum Authority of Thailand Exploration and Production International (PTTEP International) is the operator of the project. PTTEP owns an 80% interest in the project, with Myanmar Oil and Gas Enterprise (MOGE) holding the remaining 20%.

The USD 2bn project initially started delivering natural gas for domestic purposes in Myanmar in March 2014 at a rate of approximately 60 million standard cubic feet per day (Mscf/d). In August 2014, it started exporting natural gas to Thailand at a rate of 240Mscf/d.

The offshore Zawtika (PTTEP) natural gas project started production in March 2014.

On 5 January 2012, PTTEP Offshore Investment Limited (PTTEP) with Myanmar Oil and Gas Enterprise (MOGE) entered into a Shareholder Agreement with Andaman Transportation Limited (ATL) to invest in Zawtika gas transportation project.

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<sup>21</sup> <https://www.pttep.com/en/OurBusiness/Explorationandproduction/projects/Myanmar/Zawtikaproject.aspx>

According to the data reported by ATL, the total volume transported by the company in 2017 and 2018 was as follows:

**Table 52: Total quantity transported by ATL**

Date/month	Volume transported	Nature	Unit	Tariff rates	Project	Tariff
April 2017	6,533,621	Export	MMBTU	2.58	Zawtika	16,846,942
April 2017	1,675,208	Domestic	MMBTU	2.07	Zawtika	3,463,995
May 2017	7,441,998	Export	MMBTU	2.58	Zawtika	19,189,192
May 2017	1,838,053	Domestic	MMBTU	2.07	Zawtika	3,800,726
June 2017	7,819,569	Export	MMBTU	2.58	Zawtika	20,162,759
June 2017	1,813,410	Domestic	MMBTU	2.07	Zawtika	3,749,769
July 2017	7,764,695	Export	MMBTU	2.71	Zawtika	21,065,618
July 2017	1,358,802	Domestic	MMBTU	2.18	Zawtika	2,956,346
August 2017	7,593,911	Export	MMBTU	2.71	Zawtika	20,602,281
August 2017	1,309,043	Domestic	MMBTU	2.18	Zawtika	2,848,085
September 2017	7,154,784	Export	MMBTU	2.71	Zawtika	19,410,929
September 2017	1,248,661	Domestic	MMBTU	2.18	Zawtika	2,716,712
October 2017	7,166,288	Export	MMBTU	2.82	Zawtika	20,178,117
October 2017	1,000,535	Domestic	MMBTU	2.26	Zawtika	2,259,308
November 2017	6,631,484	Export	MMBTU	2.82	Zawtika	18,672,270
November 2017	1,176,793	Domestic	MMBTU	2.26	Zawtika	2,657,316
December 2017	6,585,995	Export	MMBTU	2.82	Zawtika	18,544,186
December 2017	1,642,762	Domestic	MMBTU	2.26	Zawtika	3,709,521
January 2018	5,580,570	Export	MMBTU	2.91	Zawtika	16,250,620
January 2018	1,231,485	Domestic	MMBTU	2.34	Zawtika	2,875,887
February 2018	5,428,714	Export	MMBTU	2.91	Zawtika	15,808,415
February 2018	1,235,613	Domestic	MMBTU	2.34	Zawtika	2,885,527
March 2018	7,710,576	Export	MMBTU	2.91	Zawtika	22,453,197
March 2018	1,780,626	Domestic	MMBTU	2.34	Zawtika	4,158,296
<b>Total</b>	<b>100,723,196</b>					<b>267,266,012</b>

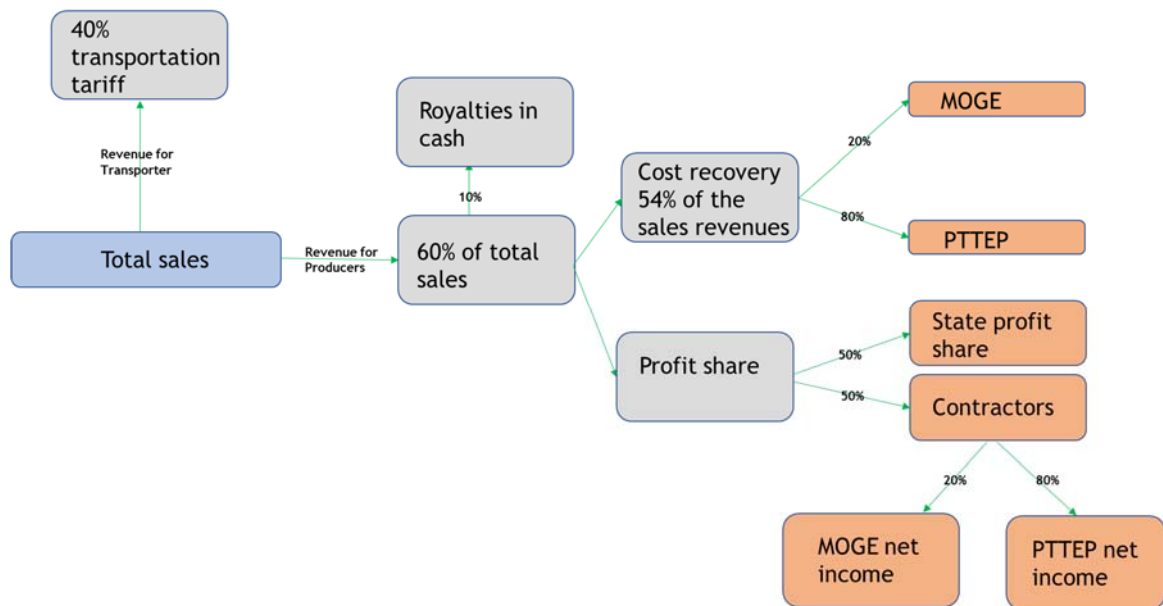
## Fiscal regime

Based on the data received from PTTEP, the company is exploiting the Zawtika project under the following contracts:

Block Number	Onshore/Offshore	Contract Type	Activity Type	Commodity	Location
M-9	Shallow Water Offshore	PSC	Production	Natural Gas	Zawtika, Mottama

According to our discussion with the PTTEP management, we understand that the fiscal regime related to this contract can be explained as follows:

Chart 16 : Zawtika project fiscal regime chart



## Production and exports

Based on the data reported by PTTEP, the total production of the Zawtika project are detailed as follows:

Table 53 : the total production of the Zawtika project

Block	For the month ending	Production Volume Gas (Mscf)	Production Value (USD)
M9	30/4/2017	9,101	53,711,281
	31/5/2017	10,173	60,602,791
	30/6/2017	10,511	62,837,355
	31/7/2017	9,992	62,963,379
	31/8/2017	9,759	61,494,301
	30/9/2017	9,245	58,076,371
	31/10/2017	8,996	58,811,052
	30/11/2017	8,609	56,127,336
	31/12/2017	9,051	58,891,418
	31/1/2018	7,567	50,829,062
	28/2/2018	7,371	49,562,620
	31/3/2018	10,375	70,014,339
Total		110,750	703,921,306



According to the information reported by the company PTTEP, the total exports of the project Zawtika are detailed below :

**Table 54 : the total exports of the Zawtika project**

Block	For the month ending	Export Volume Gas (Mscf)	Export Value (USD)
M9	30/4/2017	6,884	42,117,681
	31/5/2017	7,785	47,973,352
	30/6/2017	8,167	50,407,288
	31/7/2017	8,108	52,664,820
	31/8/2017	7,927	51,506,461
	30/9/2017	7,489	48,528,038
	31/10/2017	7,485	50,445,651
	30/11/2017	6,929	46,681,005
	31/12/2017	6,872	46,360,795
	31/1/2018	5,818	40,626,550
	28/2/2018	5,662	39,521,038
	31/3/2018	8,051	56,132,993
Total		87,177	572,965,671

## Onshore project

### Chauk and Yenangyaung Fields

Interraresources holds 60% of the rights and interests to two of the largest onshore all producing fields in Chauk and Yenangyaung under two Improved Petroleum Recovery Contracts (IPRCs). The IPRCs with Myanma Oil and Gas Enterprise (MOGE) commenced on 4 October 1996. The two fields are jointly managed through Goldpetrol Joint Operating Company Inc. The adjacent Myanmar concession extend over a total area of approximately 1,800 square metres and are located along the Ayeyarwaddy River, approximately, 580 kilometres North of Yangon. At 1st April 2018, 5808 wells had been drilled in the field and approximately 390 million barrels of oil and 176 bcf of gas had been produced. Estimated ultimate remaining recoverable oil is about 19 MMbbls.

Chart 17 : Chauk and Yenangyaung Fields map



## Fiscal regime

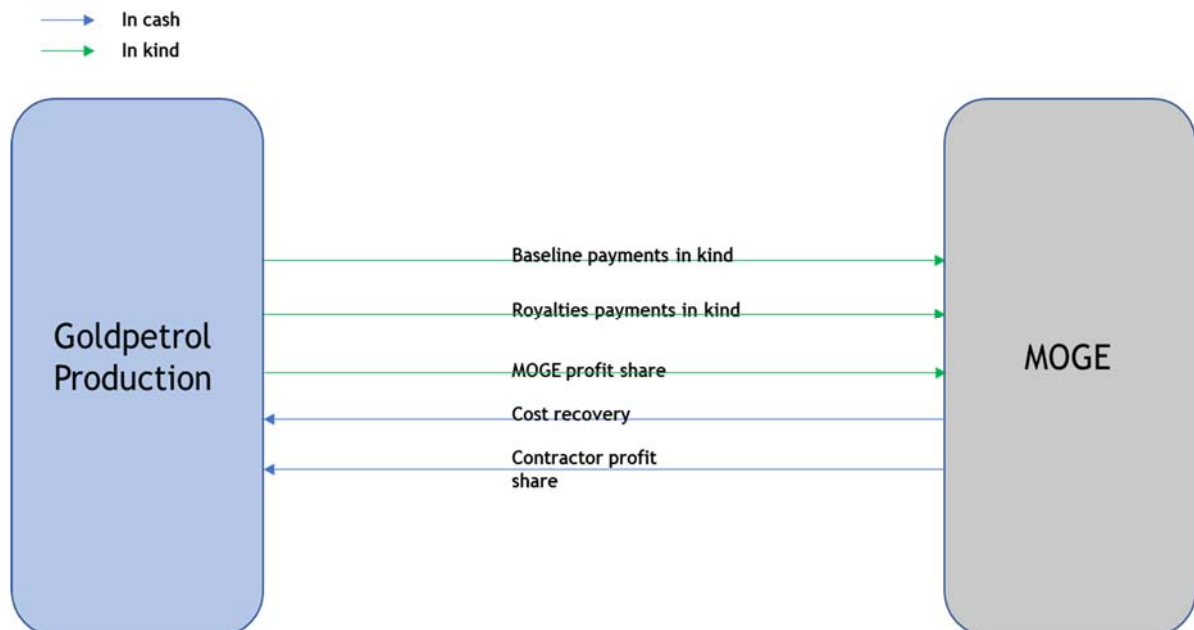
Based on the data received from Goldpetrol, the company is exploiting the project under the following contracts:

Table 55: the list of contracts of MOGE 1 and IOR 2 blocks

Block Number	Onshore/Offshore	Contract Type	Commodity 1	Area (Km2)	Location	Region
MOGE-1	Onshore	IPR	Crude Oil	60 Sq. Mile	Yenangyaung	Magway
IOR-2	Onshore	IPR	Crude Oil	82.5 sq. Mile	Chauk	Magway

Following our discussion with the Goldpetrol management, we understand that the fiscal regime related to this contract can be explained as follows:

**Chart 18 : Goldpetrol contract fiscal regime**



The main idea in this type of contract is that MOGE receives the total production in kind and pays the company in cash. We also include the following ideas in order to clarify the fiscal regime of the IPR contract:

- the Baseline payment is calculated according to the contract;
- incremental production = (Total production - baseline);
- royalties in kind is calculated as follows: (total production - baseline) \* (10% + 2.5%);
- cost recovery is calculated on the basis of the incremental production after the deduction of royalties. 50% of the remaining volume is used to determine the amount in cash to be paid by MOGE to Goldpetrol;
- Profit share: The remaining volume (after the deduction of the baseline, royalties and cost recovery) is split between Gold Petrol and MOGE: MOGE receives its profit share of 55% in kind while Gold Petrol receives 45% in cash.

## Production

Based on the data reported by Goldpetrol, the total production is set out in the table below:

**Table 56: the total production reported by Goldpetrol**

For the month ending	Oil Production Volume in bbl		Production Value (USD)	
	MOGE-1	IOR-2	MOGE-1	IOR-2
2017-04-30	40,039	27,959	2,022,394	1,412,209
2017-05-31	41,270	28,217	1,984,265	1,356,673
2017-06-30	40,002	27,079	1,788,501	1,210,702
2017-07-31	41,488	30,506	1,922,979	1,413,953
2017-08-31	41,158	30,066	2,023,721	1,478,345
2017-09-30	39,784	29,567	2,115,332	1,572,077
2017-10-31	40,488	30,827	2,215,124	1,686,518
2017-11-30	39,208	29,886	2,345,831	1,788,079
2017-12-31	39,882	30,149	2,440,386	1,844,817
2018-01-31	40,160	29,388	2,643,733	1,934,612
2018-02-28	36,456	26,864	2,271,557	1,673,896
2018-03-31	39,950	29,155	2,510,866	1,832,392
	479,885	349,663	26,284,688	19,204,274

## Mann Field

The Mann Field is situated on the Northern plunging end of the 30-mile-long Mann-Minbu structure trend in the oil province of the Central Myanmar basin. The Mann field was discovered in April 1970 by Myanma Oil and Gas Enterprise (MOGE) and this recovery led to the Padaung formation. At 1st April 2018, 668 wells had been drilled in the field and approximately 122 million barrels of oil and 125 Bcf of associated gas had been produced. Estimated ultimate remaining recoverable oil is about 17 MMbbls. The field is currently producing about 1,234 barrels of oil per day from 330 wells.

MPRL E&P, formerly known as Myanmar Petroleum Resources Ltd, is the current holder of a Performance Compensation Contract originally signed between Baker Hughes Singapore and MOGE.

## Fiscal regime

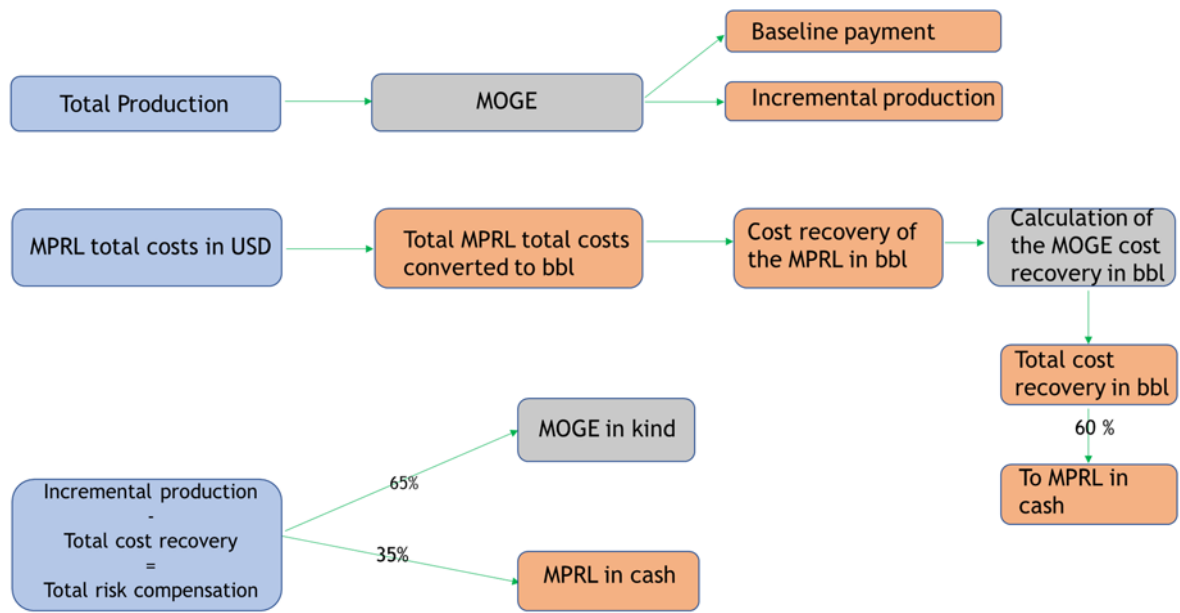
Based on the information received from MPRL, MOGE is exploiting the project under the following contract:

**Table 57: Details of the PCC contract**

Block Number	Onshore/Of fshore	Contract Type	Activity Type	Commodity 1	Commodity 2	Area (Km2)	Location	Region
Mann Oil Field MIC Permit No.218 / 1996	Onshore	PCC	Production	Crude Oil	Natural Gas	52 km2	Minbu	Magway

We understand that MOGE is the operator of this contract and MPRL is the contractor. The fiscal regime in this contract can be presented as follows:

Chart 19 : MPRL contract fiscal regime



Following a meeting held with the MPRL management, we understand that the payment flows related to this contract are calculated as follows:

MPRL transfers the baseline payment to MOGE based on a formula established by the agreement. The difference between the total production and the baseline payment is **the incremental production**.

MPRL calculates the total cost incurred with regards to this project in USD and the amount is subsequently converted in number of barrels.

The cost recovery (in kind) is transferred to MOGE representing 40% of the total cost supported by MPRL, while the remaining 60% of this cost is paid to MPRL in cash.

The difference between the incremental production and the cost recovery converted in number of barrels representing the compensation risk. MOGE keeps 65% of this amount in kind, while the equivalent of 35% of this amount is paid cash to MPRL.

It is important to note that in this type of contract, there are no royalties paid to MOGE. Additionally, all the production is transferred to MOGE in kind, whereas MPRL receives all its payments in cash.

### Production and exports

Based on the data reported by MPRL, the total production is detailed as follows:

**Table 58: Total production of Mann Oil Field**

Block	For the month ending	Production Volume		Production Value (USD)	
		Crude Oil (barrel)	Gas (mscf)	Crude Oil	Gas
Mann Oil Field	30/04/2017	41,284	56.043	1,872,149	92,168
Mann Oil Field	31/05/2017	42,213	58.357	1,920,177	95,973
Mann Oil Field	30/06/2017	40,542	60.661	1,725,390	99,763
Mann Oil Field	31/07/2017	42,062	60.845	1,989,453	100,066
Mann Oil Field	31/08/2017	41,793	60.701	1,919,875	99,829
Mann Oil Field	30/09/2017	40,414	60.445	2,120,476	99,408
Mann Oil Field	31/10/2017	41,311	62.757	2,277,413	103,210
Mann Oil Field	30/11/2017	39,690	59.033	2,283,316	97,086
Mann Oil Field	31/12/2017	40,764	58.360	2,479,186	95,978
Mann Oil Field	31/01/2018	41,109	58.766	2,555,303	98,704
Mann Oil Field	28/02/2018	36,360	52.707	2,190,673	88,527
Mann Oil Field	31/03/2018	39,945	58.179	2,530,897	97,718
<b>Total</b>		<b>487,487</b>	<b>706.854</b>	<b>25,864,308</b>	<b>1,168,429</b>

The sales of MOGE's share will be subject to a separate commodity trading report which will relate to the sale of the State's shares under the various oil and gas agreements.

### 3.2.6. PROCEDURES FOR THE AWARD OF OIL AND GAS BLOCKS

#### Blocks awarded during 2017-2018:

Following a meeting held with the Oil and Gas Planning Department (OGPD) management team, we understand that there has been no call for Bidding Round for exploration, extraction and excavation on both onshore and offshore after the financial year 2011-2013. We also understand that there are on-going discussions to launch an international bidding process during 2020 for the attribution / development of available onshore and offshore blocks following the notification of the new Oil and Gas law and pending the conclusion of discussions between the National Economic Coordination Committee NECC and MOPF in order to update the fiscal terms of the PSC model.

From the list of oil blocks made available to us by MOGE for the purpose of preparing this report (presented in the annex 2 and 3), there were no new attribution during the FY 2017-2018.

#### Biddings rounds 2013-2014:

Before 2011, there was no Oil and Gas bidding process and the senior authorities allocated blocks to companies through direct negotiations. However, since 2010, Production Sharing Contracts are increasingly being awarded through licensing rounds. A bidding process and evaluation procedure has been implemented for the award of licenses.

The first licensing rounds for oil and natural gas fields took place in 2013 as follows:

On 17 January 2013, MOGE announced a round of bidding for 18 onshore blocks: 3 IPRs and 15 PSCs

- Expressions of Interest were due on 16 March 2013;
- 59 bidders were shortlisted for the second round of bidding;
- 26 shortlisted bidders submitted 53 bids for 16 blocks; and
- 11 bidders were awarded 16 onshore blocks on 10 October 2013.

Table 59: List of awarded onshore blocks

Recent onshore energy block winners		
Company name	Country	Number of blocks
<b>Production Sharing Contract</b>		
ONGC Videsh	India	2
<b>Recent onshore energy block winners</b>		
Eni	Italy	2
Petroleum exploration	Pakistan	2
<b>Recent onshore energy block winners</b>		
Brunei National Petroleum	Brunei	1
Petronas	Malaysia	1
Pacific Hunt energy	Canada	2
CAOG S.a.r.l	Luxembourg	1
JSOC Bashneft	Russia	1
PTTEP South Asia Ltd and Palang	Thailand	1
Sophon Offshore	Thailand	1
<b>Petroleum Recovery Contracts</b>		
MPRL E&P Pte	British Virgin Islands	2

ON 11 APRIL 2013, A NEW BIDDING ROUND WAS ANNOUNCED FOR SHALLOW WATER BLOCKS (11 PSCS) AND DEEP-WATER BLOCKS (19 PSCS) AS FOLLOWS:

- EXPRESSIONS OF INTEREST WERE DUE ON 14 JUNE 2013;
- 61 BIDDERS WERE SHORTLISTED FOR THE SECOND ROUND OF BIDDING;
- 30 SHORTLISTED BIDDERS SUBMITTED BIDS ON 15 NOVEMBER 2013; AND
- 13 BIDDERS WERE AWARDED 10 SHALLOW WATER BLOCKS AND 10 DEEP WATER BLOCKS IN MARCH 2014 AS FOLLOWS:

#### SHALLOW WATER BLOCKS:

TABLE 60: LIST OF AWARDED BLOCKS

N°	Block/Area	Company awarded	Country	Acreage (sm km)
1	A4	BG Asia Pacific and Woodside Energy(Myanmar)	UK and Australia	2,200
2	A5	Chevron (Unocal Myanmar Offshore Co. Ltd)	United States	10,600
3	A7	BG Asia Pacific and Woodside Energy(Myanmar)	UK and Australia	8,220
4	M4	Oil India Ltd, Mercator Petroleum Ltd and Oilmax Energy	India	na
5	M7	ROC Oil and Tap Oil	Australia	13,000
6	M8	Berlanga Holding	Netherlands	na
7	M15	Transcontinental Group	Australia	na
8	M17	Reliance Industries	India	27,600
9	M18	Reliance Industries	India	na
10	10 YEB	Oil India Ltd, Mercator Petroleum Ltd and Oilmax Energy	India	na

#### DEEP WATER BLOCKS

TABLE 61: LIST OF AWARDED BLOCKS

N°	Block/Area	Company awarded	Country	Acreage (sm km)
1	AD2	BG Asia Pacific and Woodside Energy(Myanmar)	UK and Australia	8,098
2	AD3	Ophir Energy Pic	United Kingdom	10,000
3	AD5	BG Asia Pacific and Woodside Energy(Myanmar)	UK and Australia	10,560
4	AD9	Shell Myanmar Energy and MOECO	Netherlands	na
5	AD10	Statoil and Conoco Philips	Norway and United States	9,000
6	AD11	Shell Myanmar Energy and MOECO	Netherlands	na
7	MD2	Eni Myanmar	Italy	na
8	MD4	Eni Myanmar	Italy	na
9	MD5	Shell Myanmar Energy and MOECO	Netherlands	na
10	YWB	Total E&P	France	na

Once an agreement has been reached between MoEE and the selected candidates, MoEE requests comments from relevant Government Agencies such as the Union Attorney General Office, the Union Auditor General Office, the Ministry of National Planning and Economic Development, the Ministry of Planning and Finance and the Central Bank on the draft contract.

Following the receipt of comments from these Government Agencies, the draft contracts are submitted to the Economic Committee Cabinet and Myanmar Investment Commission for approval. Once the Myanmar Investment Commission has approved these contracts, successful bidders can enter into the PSC Contracts.

12 companies (successful bidders) have executed PSC Contracts for 19 offshore blocks with MOGE.

The list of selected candidates was announced on the Ministry of Electricity and Energy Website which held a press release for announcement of selected candidates on 26 March 2014.



### Criteria and process used for the license awarding:

For the bid rounds under the new process, MOGE set out the following bid assessment criteria:

- Technical capability;
- Financial capability;
- Prior experience in Myanmar;
- Financial terms for the block; and
- Experience relevant to the block (e.g. deep-water).

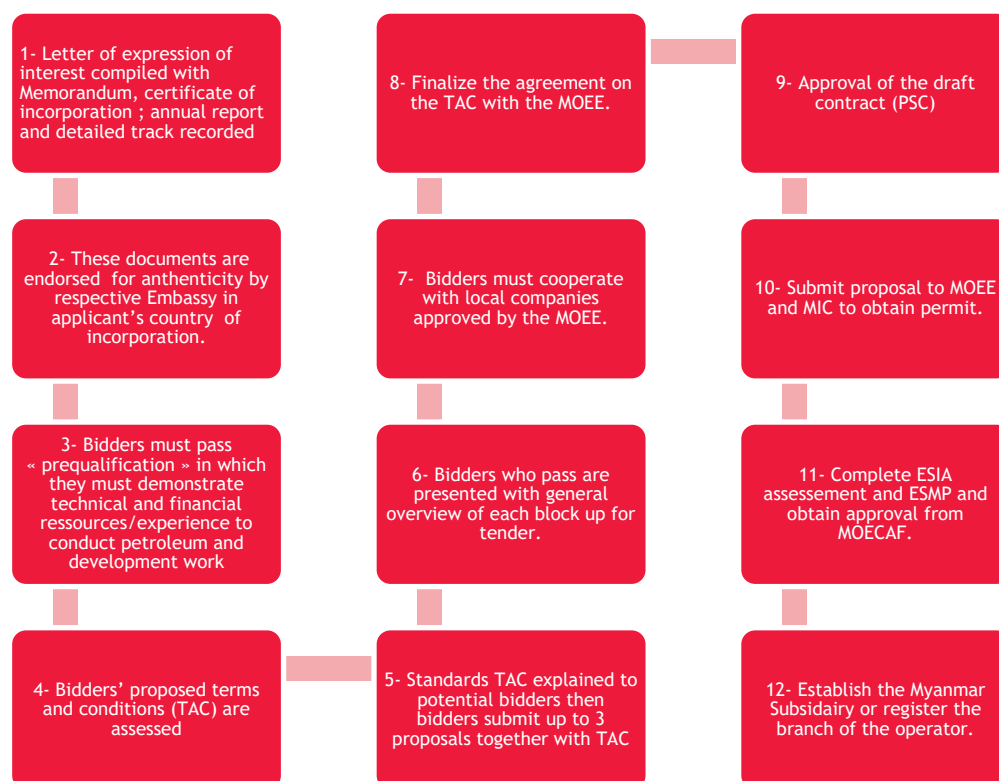
MOGE's Shallow/Deep Offshore PSC Selection Criteria allocated scores as follows:

Sr. No	Description Mark	Mark
1	Work Program and Expenditure	60%
2	Production Split	20%
3	Signature Bonus & Working Experience	10%
4	Financial Standing	10%
Total		100%

Moreover, for onshore and shallow water blocks, potential bidders must partner with at least one local company which is registered with the Oil and Gas Planning Department (OGPD). Bidders for deep water offshore blocks are not required to partner with a local company.

The figure below outlines the application process used by GOUM to manage the development for available oil and gas blocks.

Chart 20: the application process of the development for available oil and gas blocks



### License transfer:

The transferor and transferee sign documents on the transfer or exchange of oil blocks and these are submitted to MOGE. The MOGE consent is required for transfer of interest. The MOGE checks

with the IRD whether there are any taxable gains resulting from the transaction. The MOGE seeks approval from the Leading Committee of the MOEE and then from the Executive Committee when the IRD reply is received. Approval is sought from the MIC after receiving approval from the Executive Committee. It usually takes about 90 days in order to get written consent from the MOGE on transfer.

The MOGE confirmed that there was no transfer or exchange of interest in a block taken place during FY 2017-2018.

### 3.2.7. Policy on disclosure of contracts and licenses

#### Contracts disclosures

The oil and gas legislation do not include any express restrictions on the public disclosure of contracts and licenses by the government. However, signed contracts are not currently published due to the confidentiality provisions in oil and gas contracts.

Under this contract, information regarding the exploration period, the work programme and expenditure, production periods, royalties, production shares, data fees, production bonuses for both crude oil and gas, domestic requirements, cost recovery provisions, training and research and development funds, state participation, income tax and tax holiday periods, profit sharing and arbitration and governing laws are addressed.

The existing oil and gas contracts are predominantly PSCs entered into by MOGE and private operators. PSCs are all based on a model contract that MoEE has used for several years. This model contract contains a confidentiality provision which prevents the public disclosure of information relating to oil and gas operations by both MOGE and the operators as follows:

Clause 27.5 of the model PSC stipulates that “Contractor undertakes to maintain in strictest secrecy and confidence all data and information purchased or acquired from MOGE as well as during the course of operations... until such time as MOGE agrees in writing to release the Contractor from its undertakings and obligations CONTRACTOR may disclose data and information to government authorities if required by law and, in order to facilitate the conduct of the Petroleum Operations may also disclose data and information to affiliates, its contractors, consultants and bona fide prospective assignees provided that the CONTRACTOR obtains an undertaking by the recipient to maintain such data in strictest secrecy and confidence. MOGE may use at its own discretion all the data and information obtained but shall undertake to maintain such data and information in the strictest secrecy and confidence during the term of this Contract.”.

In practice, only the PSC signed between Total Myanmar E&P and MOGE for the Yedana project dated 9 July 1992 is publicly available<sup>22</sup> We also noted the existence of the model PSC published on an external website<sup>23</sup>. We understand that this model was published during the bidding round of 2013 on MoEE’s website but was subsequently removed from the website.

However, as part of efforts to improve transparency and the publication of contracts, MEITI and NRGi held the Contract Transparency Workshop on December 16, 2019.

This workshop brought together over 60 participants from various government departments, civil society organizations and private sectors (oil & gas, mining) and aim to :

- To increase knowledge of EITI stakeholders on contract transparency and to better understand the new EITI standards on contract transparency;
- To explore and identify potential challenges in implementing the standard; and

<sup>22</sup> <https://www.resourcecontracts.org/contract/ocds-591adf-6716589315/view#/pdf>

<sup>23</sup> <http://charltonsmyanmar.com/wp-content/uploads/2013/10/Model-Production-Sharing-Contract-Onshore.docx>

- To identify preparatory measures before January 2021.

The summary of the group discussion were :

- how to implement the new EITI standards 2019;
- identify possible challenges/barriers when implementing; and
- explore way to overcome those challenges/barriers.

Following this workshop, it was decided the following next steps :

- Work-plan sub-committee to discuss implementation of contract disclosure and then during MSG meeting; and
- Conduct another workshop in February or March 2020.

### **3.2.8. State participation in the oil and gas sector**

The Constitution of the Republic of the Union of Myanmar 2008 stipulates that the state is the ultimate owner of all-natural resources including Oil and Gas.

According to chapter 2 of the State-Owned Economic Enterprises Law (1989)<sup>24</sup> : “The Government has the sole right to carry out the following economic activities as State-Owned Economic Enterprise:

- exploration, extraction and sale of petroleum and natural gas and production of products of the same; and
- exploration and extraction of pearls, jade and precious stones and export of the same.

Following our review of the contextual data of the oil and gas sector, we understand that the State’s intervention in the sector is made primary through MOGE, MPE and MPPE.

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<sup>24</sup> [https://www.burmalibrary.org/docs15/1989-SLORC\\_Law1989-09-State-Owned\\_Enterprise\\_Act-en.pdf](https://www.burmalibrary.org/docs15/1989-SLORC_Law1989-09-State-Owned_Enterprise_Act-en.pdf)

## a. State Owned Enterprises (SOEs)- MOGE

In 1989, Myanmar enacted its State-Owned Economic Enterprise Law, identifying key areas of economic activities where the State would exercise control via SOEs. Although this law remains in effect, the Foreign Investment Law largely determines, in practical terms, how GOUM exercises its involvement in the extractive sector. For example, in contrast to the State-Owned Economic Enterprises Law, GOUM no longer exercises its right to monopolise the extraction of resources.

### i. Evolution of MOGE participation in the Oil and Gas sector

According to the information received from the MOGE, we understand that there were no changes in the MOGE participation in the Oil and gas sector between 2016-2017 and 2017-2018. The details of MOGE's interest in the different oil and gas projects are presented below.

**Table 62: MOGE participation in the O&G sector**

	Project		Operator	Interest distribution (in %)							
Offshore projects	Yadana	TOTAL	31%	MOGE	15%	UNOCAL	28%	PTTEP	26%		
	Yetagun	PCML	41%	MOGE	21%	Nippon Oil	19%	PTTEP	19%		
	Shwe	Daewoo	51%	MOGE	15%	ONGC	17%	Gail	8%	Korea Gas Corporation	9%
	Zawtika	PTTEP	80%	MOGE	20%						

Source: MOGE

- On the basis of the data reported by MOGE, it does not hold any shares in oil and gas operator companies.
- We also understand that MOGE does not hold any interests in the Onshore permits.

### ii. Financial relationship between MOGE and the GOUM

#### Transfers performed by the MOGE

Following the review of data reported by MOGE, we note that it transferred the following amounts to the following Government Agencies:

**Table 63: Transfers performed by the MOGE**

Nature of transfers	Amount in million MMK	Beneficiaries
5% Commercial Tax	233,671	IRD
8% Specific Goods Tax	293,326	IRD
State Contribution	114,832	Treasury department
Income Tax	143,540	IRD
Royalty and Bonus	352,874	OGPD
<b>Total</b>	<b>1,138,243</b>	

According to the information received from the MOGE, we understand that in accordance with the oil and gas agreements (PSC, PCC and IPR), MOGE is responsible for the payments of all the taxes on the behalf of Oil and Gas companies except the income tax for the contracts signed before 2014. Thus, MOGE created a deposit fund at the Customs Department in order to support the different customs duties on the behalf of Oil and Gas companies. The movements of this deposit are detailed as below.

The customs deposit represents the amount transferred by the MOGE to the MCD. The deductions from customs deposit represent the annual amounts supported by the MOGE on the behalf of the Oil and Gas companies.

**Table 64: Details of the MOGE deposit**

Nature of transfers	Amount in million MMK
Customs deposit	31,000
Deduction from customs deposit	(539)
<b>Net deposit in 31/03/2018</b>	<b>30,461</b>

According to the data reported by the MOGE, we understand that the SOE is not distributing dividend.

## Loans contracted by MOGE

According to information received from the MOGE, details of loans contracted are described as follows:

**Table 65: Details of the MOGE loans**

No	Contract No/ Purchase	Agreement Date	Loan	Particulars	Curr ency	Loan Amount	Paid up to 31.3.2018		Balance to be Paid		Lender / Suppliers
							Principal	Interest	Principal	Interest	
1	PBC NO (2007)10,11,12 TOTAL NO. (031),(032), (033)	27.9.07	China Soft Loan	Four Drilling Rigs and Oil Field Equipment and Materials Project	USD in million	80.51	44.28	19.14	36.23	2.75	Export-Import of China / Central Bank of Myanmar
2	18 01 01-00 16 01(MY-C1)	15.1.13	JACA Loan	Offshore Petroleum Exploration Project	JY in million	11,629.72	5.84	5.78	11,623.88	23.25	Japan International Cooperation Agency
3	5300942322009591489	20.12.09	CDB (24")	Yadana-Yangon 24" Gas Pipelile Project	Euro in million	185.60	35.92	62.39	149.68	44.54	China Development Bank
4	5300942322010591241	16.12.10	CDB(EURO)	Offshore Natural Gas Development and Pipeline Project/ Onshore Natural Gas Pipeline Project	Euro in milliom	452.75	67.78	114.37	384.97	108.58	China Development Bank (CDB) Loan /Myanma Foreign Trade Bank
5	5300942322010591242	16.12.10	CDB(RMB)	Oil Pipeline Project	RMB in million	7,358.40	913.58	1,516.22	6,444.82	1,463.48	China Development Bank (CDB) Loan /Myanma Foreign Trade Bank

## Review of the budget law:

Following the review of the 2017 Union Budget Law<sup>25</sup> and Union Supplementary Law of the 2017-2018 financial year<sup>26</sup>, we set out in the table below the figures reported as receipts by Government Agencies from SOEs:

**Table 66: SOEs receipts during 2017-2018**

Receipt 2017 in million MMK			
The State-owned Economic - Organizations under the Ministry of Electric Power and Energy	Other Current Receipts	Receipts from Foreign Aids	Loans drawn
	3,716,498	1,911	215,046

Expenditure supported by the government on the behalf of SOEs:

- 2017 Union Budget law:

Expenditure 2017 in million MMK						
Expenditures of Union Budget				Working Capital for carrying out their functions with their own fund		
State-owned Economic - Organisations under the Ministry of Electric Power and Energy	Current Expenditure	Capital expenditure	Repayment of loans	Current Expenditure	CT, SGT, Income tax, contribution to the state	Capital expenditure
	710,688	268,689	178,838	2,131,607	760,942	15,978

- 2018 Supplementary budget law:

Supplementary Expenditure Sanctioned 2017-2018 in million MMK						
Expenditure of Union Budget				Working Capital for carrying out their functions with their own fund		
State-owned Economic - Organisations under the Ministry of Electric Power and Energy	Current Expenditure	Capital expenditure	Repayment of loans	Current Expenditure	CT, SGT, Income tax, contribution to the state	Capital expenditure
	115,741	87,193	40,701	242,719	153,054	2,362

We understand that the SOEs falling under the Ministry of Electric Power and Energy are MOGE, MPE and MPPE, but we have not received the split of those amounts received per SOE.

The principal vehicles by which MOGE collects these revenues appear to be their production sharing contracts, which entitles the government's to its share of profit on petroleum (40 to 60 percent for oil and gas, according to details released by the government), production bonuses and other fees for training and development purposes (aimed at increasing MOGE's capacity building). Beyond its revenue collection and marketing responsibilities, MOGE plays major roles in the allocation of licenses, the monitoring of implementation of the country's legal regime and efforts to develop commercial capacity.

## MPE and MPPE

We understand that the Myanmar Petrochemical Enterprise (MPE) and Myanmar Petroleum Products Enterprise (MPPE) are mainly involved in the downstream sector. Thus, all details regarding those company will be included in the commodity trading report dedicated to the Oil and Gas Downstream sector.

<sup>25</sup> [https://www.mopfi.gov.mm/sites/default/files/upload\\_pdf/2018/09/2017%20Union%20Budget%20Law\\_English.pdf](https://www.mopfi.gov.mm/sites/default/files/upload_pdf/2018/09/2017%20Union%20Budget%20Law_English.pdf)

<sup>26</sup> [https://www.mopfi.gov.mm/sites/default/files/upload\\_pdf/2018/09/2017-2018%20SG%20Law\\_%20English.pdf](https://www.mopfi.gov.mm/sites/default/files/upload_pdf/2018/09/2017-2018%20SG%20Law_%20English.pdf)

### 3.3. Legal framework and context of the mining sector (including G&J and Pearl)

#### 3.3.1. General context of the mining sector

Myanmar is well known for the untapped potential of its extensive mineral portfolio. Home to the world's largest deposits of jade and some of the most sought-after rubies, it also has substantial deposits of lucrative metals as well as industrial minerals. Despite significant deposits, foreign investment across Myanmar's mining sector has lagged behind other key industries due to poor administration, legal uncertainty and ongoing conflicts. As such, the diverse landscape of Myanmar remains largely underexplored. However, with previous legal uncertainties addressed in recently amended mining laws and rules, a multitude of prospectors are waiting in the wings, ready to extract valuable resources<sup>27</sup>.

Myanmar's mining sector is made up of large-scale mining, small scale artisan extraction and a certain amount of informal mining. The mining sector operates both through granting concessions to private investors and through State Owned Mining Enterprises placed under the Ministry of Natural Resources and Environmental Conservation (MONREC).

In the precious gem subsector, around 90% of the world's supply of Rubies are sourced from Myanmar and the country is also the world's largest single source of Jade. The Government of Myanmar prohibits the extraction of precious gems by foreign investors. The sub-sector also remains subject to sanctions, thus entirely off limits to foreign investors for the foreseeable future.

On 26 July 2018 the Department of Mines at the Ministry of Natural Resources and Environmental Conservation (MONREC) began accepting applications from local and international companies to undertake projects in the country.

The stage for this was set by the February promulgation of Notification No. 13/2018 (the Mine Rules), which implements the provisions laid out under the delayed 2015 Mines Law<sup>28</sup>.

Copper makes up the largest export metal in the mining sector, while silver, lead, tin, tungsten and antimony deposits are widespread across the country. Exploration of metallic or industrial minerals can only be undertaken through a JVA with citizens of Myanmar.

#### 3.3.2. Mineral resources

##### a) Gems and Jade

Myanmar is the world's single largest source of jadeite (jade) globally, accounting for an estimated 90% of global production.

Coloured gemstones are mined in approximately 50 countries worldwide. Of these, Myanmar is renowned for its abundance of high-quality gemstones, including world-class rubies, sapphires (ruby and sapphire are both varieties of corundum) and jadeite. Other gemstone varieties found in Myanmar include spinel, diamonds, tourmaline, peridot, topaz, garnet, moonstone, lapis lazuli, chrysoberyl, amber, quartz, and more. There are also a few extremely rare varieties of gemstone that are unique to Myanmar and have never been found anywhere else in the world.

The largest official venue for selling jade is the "Myanmar Gems and Jade Emporium," held in the capital Nay Pyi Taw up to three times a year. Jade is also sold at smaller trading centres and markets elsewhere in Myanmar, including in Mandalay, Yangon and Myitkyina, the capital of Kachin State.<sup>29</sup>

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<sup>27</sup> <https://oxfordbusinessgroup.com/myanmar-2019/mining>

<sup>28</sup> <https://oxfordbusinessgroup.com/news/myanmar%E2%80%99s-mining-sector-reopens-investors>

<sup>29</sup> <https://resourcegovernance.org/sites/default/files/documents/jade-info-booklet.pdf>



While a number of geological surveys of Myanmar's gem-producing areas have been undertaken over the past decades, the quality and reliability of these is not known, and there is very little publicly available information. The lack of clear and up-to-date geological information leads to a considerable amount of speculation and misinformation about potential gem-yielding areas, makes the allocation of gemstone production permits more challenging, and is also therefore a deterrent to investors. This is an area requiring further attention and strengthening.

### Coloured Gemstones

The Mogok valley in Mandalay Division, around 150 miles North East of Mandalay, is probably the most well-known of Myanmar's gem producing areas due to its famous ruby deposits, and the Mogok stone tract has been known throughout history as the 'Land of Rubies'. The allure of certain wealth in return for control of the gemstone mines has fuelled conflicts in this area throughout history.

According to the 2017-2018 production data provided by Myanmar Gems Enterprise (MGE), 87.7% of the national gemstones production was extracted from Mandalay Division, followed by Shan State producing 12.2% of the national gemstones production as shown in the table below:

**Table 67: Actual MGE, Coloured Gemstones**

Commodity	Rough Ruby/Sapphires /Rough (Others)	Location (Region)	Weight		Value MMK	%
			Carat	Kilo		
Gems	Rough Ruby/Sapphires (20%)	Mandalay Division	3,963,496.60	3,227	1,063,700,000	87.7%
	Rough (Others) 10%		2,124,394.65	1,687.4	326,400,000	
	Rough Ruby/Sapphires (20%)	Shan State	861,273.50	-	192,608,200	12.2%
	Rough Ruby/Sapphires (20%)	Kachin State	165.80	-	893,200	0.1%

### Jadeite

Jadeite (jade) is found predominantly in the Hpakant area of Kachin State as well as Mohnyin, and also in Hkamti Township in Sagaing Division. Myanmar is the world's main commercial source of jade although jadeite also occurs in Guatemala, Japan and the US. It is commonly estimated that up to 90% of the world's jade is now mined around the Hpakant area and sold to Chinese buyers. Myanmar's 'imperial jade' is the most valuable in the world with its translucent to almost transparent bright emerald green colour.

According to the 2017-2018 production data provided by MGE, Kachin State produced 98.3% of the national jadeite production followed by Sagaing Division for 1.7% as shown in the table below:

**Table 68: Jade 2017-2018 production**

Commodity	Rough Ruby/Sapphires /Rough (Others)	Location (Region)	Weight		Value MMK	%
			Carat	Kilo		
Jade	Jade (Rough Materials) 20%	Kachin State	-	31,054,204	115,988,528,275	98.3%
	Others (Rough Materials) 10%		-	62,187	93,978,150	
	Jade (Rough Materials) 20%	Sagaing Division	-	559,464	1,977,357,400	1.7%
	Others (Rough Materials) 10%		-	1,918	30,249,600	

### b) Other minerals

#### Copper

Myanmar has nearly 65 copper occurrences, which include the world class high sulphidation copper deposits at Monywa. In the past copper was rather used as a by-product of the Bawdwin Mine, and copper has also become associated with epigenetic vein type and epithermal gold and silver deposits.

The Monywa high sulphidation copper deposits is located 150 km NW of Mandalay in Central Myanmar and is one of the largest copper resources in mainland southeast Asia, with 7 Mt of

contained copper. This foremost deposit constitutes three orebodies known as the Kyisintaung, Sabetaung, and Letpadaung, which have a total resource estimation of 1.5 billion tonnes with cut-off grade of 0.40% Cu. The Letpadaung Deposit is located 7 km to the south east of the other deposits mentioned and is one of the biggest copper mines in Myanmar. Production that has been taken from the Sabetaung, which is now considered to be mined in a single pit, and the Kyisintaung is known to commonly lie beneath a prominent hill to the immediate west of the Sabetaung and Letpadaung deposits, which underlie an isolated 6 km hill that is bisected by a north east trending valley. Together these deposits are strongly considered to comprise the northern most copper resource in the 7,000 km Banda Sunda Myanmar Arc.

Letpadaung is a large mine project operated by the Wanbao Mining Copper Ltd, in cooperation with the Union of Myanmar Economic Holdings Ltd (UMEHL). Wanbao, a subsidiary of China North Industries Group Corp, bought the project from Ivanhoe, a Canadian mining company in 2011. Ivanhoe divested its share of the project in 2011 selling its stake for a reported \$103m to the Myanmar Wanbao Mining company under the Ministry of Mines (MoM). The final agreement with Wanbao, reached in 2012, under a joint venture (JV), gave it a 30% share of the eventual profits, while 19% would go to UMEHL and the remaining 51% to Myanmar's government. A later agreement gave 2% of profits to local development. The project is reported to have cost approximately \$1 billion to develop with an annual production target of 139,000 tonnes of copper<sup>30</sup>.

#### **Refined Lead/ Refined Silver and Zinc Concentrates**

Mining operations in Namtu Bawdwin lead/zinc mine started since the 15<sup>th</sup> century. The mine was operated by the Burma Mines Ltd prior to Myanmar's independence from British Colonial rule and became a joint venture operation in 1951. The mine is currently operating under No.1 Mining Enterprise. Other lead/zinc mines under No. 1 Mining Enterprise are Yadanatheingi and Bawsaing mines all of which are located in the Shan States. Bawdwin underground mine has its own concentrating plant for upgrading of sulphide ores of lead, where after the concentrates are fed into smelter at Namtu to produce refined lead and refined silver and zinc concentrates. By-products include copper matte, nickel speiss and antimonial lead. There are privately owned lead/zinc mines in the same region. Most of the lead/zinc production are exported. Silver and lead produced by the No.1 Mining Enterprise are also registered with London Metal Exchange.

#### **Refined Tin, Tin Concentrate, Tin Wolfram mixed concentrates**

The majority of tin-tungsten deposits are situated in the Tanintharyi (Tennanserim) Region, especially in the Dawei (Tavoy) and Myeik (Mergui) districts, except the largest deposit at Mawchi (Kayah State). The Dawei district has the largest and more important tin-tungsten lode mines, whereas more tin-rich tin-tungsten lode mines, tin lode mines, and alluvial tin deposits are found in the Myeik district. The Tagu tin-tungsten deposit is located in the middle region of the WGP in the southern part of Myanmar, and the tin-tungsten mineralised quartz veins are hosted by both granite and metasedimentary rocks.

The principal tin-producing area is located around the port town of Dawei. Most historical production was from elluvial/alluvial deposit types that are particularly focused around Myeik in the far south. This metallogenic province is also rich in tungsten spatially associated with the tin mineralisation, commonly in the form of wolframite and more rarely as scheelite. In some deposits, tungsten contents exceed tin, and there appears to be a geographic zonation in Sn:W ratio<sup>31</sup>

The Mawchi mine, located in the Kayah State was well known for its tin tungsten scheelite mixed concentrate in the world market until most of the installations were destroyed during the Second World War. Tin and Tungsten mixed concentrates are also produced from various mines in Tanintharyi division. Heinda Kanbauk and Kalonta tin mines are major tin producing mines. All tin

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<sup>30</sup> <https://www.nytimes.com/aponline/2014/12/22/world/asia/ap-as-myanmar-mine-protest.html>.

<sup>31</sup> <https://www.mdpi.com/2075-163X/9/11/654/htm>

and tungsten mines have been privatised and at present there is no state operated tin tungsten mine apart from one tin smelter in Thanlyin.

Myanmar Pongpipat Company Limited, a Thai private own company under Foreign Direct Investment with Myanmar Investment Commission since 1999, operates the Heinda Tin Mine located in Dawei, Taninthayi Division with No.2 Mining Enterprise, Ministry of Nature Resources and Environmental Conservation. Heinda Tin Mine is regarded as one of the largest open-pit tin mines in the country. The mine was discovered in 1923 by Anglo-Burma with a three-megawatt hydro power plant. Myanmar Pongpipat Company Limited has been operating this mine since 1999. The main production is high grade Tin Concentrate.

Delco Limited operates in one of the nation's biggest tin mine, located in Dawei District of Tanintharyi Division in southern Myanmar. Under the Myanmar Mining Act, the company has been granted permission to operate large scale mining for a period of 50 years. Its specialised product group is tin tungsten with concentration made to tin due to its versatile applications in electronics and hi-tech goods.

## Coal

Myanmar is endowed with significant deposits of coal. The coal deposits are typically situated in pockets in southern, central, western and north-western Myanmar. The large-scale mines are located in Magway, Mandalay, Sagaing, Shan and Tanintharyi region.

Maw daung open-cast mine in Tanintharyi division produces over 500,000 tonnes annually which are exported across the border to Thailand. Private-owned coal mines in Shan State are operated by nine local entrepreneurs for local consumption.

The main active coal production projects are:

- coal mine in Kyauk Ohn Chaung, Kalaywa, Sagaing State is operated by Htoo Han Thit Co. Ltd;
- coal mine located in Sagaing region in western Myanmar, about 150 km from the plant site which supplies coal, is operated by Shwe Taung Mining Company Limited; and
- coal mine in Sagaing Region's Kalewa Township is operated by Max (Myanmar) Company Limited;

## Gold

Myanmar has more than 300 gold occurrences. Gold deposits are classified as either primary or alluvial types. Gold deposits are located in six main geological associations/tectonic belts in Myanmar: Central Magmatic Arc, Tagaung-Myitkyina Belt, Sagaing Fault Zone, Mogoke Metamorphic Belt (MMB), in the Chaung Magyi and Mergui Groups and Jade Mines Belt<sup>32</sup>.

Kyaukpahtoe gold mine located in the Kawlin township Sagaing division is operated by Eternal Mining Co., Ltd. Private gold mines in Mandalay division, Sagaing division and Kachin States are being operated with production sharing contracts with ME 2. The government is working in joint venture with three foreign companies for exploration of gold and one of the companies is already at the production stage

Modi Momi Gold Mine, operated by the National Prosperity Gold Production Group, estimates it holds more than 2.3m oz of gold.<sup>33</sup>

Following the passing of the new mining legislation in 2016, a first new foreign investment has been announced. Australian PanAust Group has been granted a license for exploration and production at three sites in Sagaing Region via its local subsidiary Wuntho Resources, a Joint Venture with local Myanmar Energy Resources Group International.

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<sup>32</sup> [https://www.researchgate.net/publication/321079033\\_Chapter\\_25\\_Gold\\_deposits\\_of\\_Myanmar/link](https://www.researchgate.net/publication/321079033_Chapter_25_Gold_deposits_of_Myanmar/link)

<sup>33</sup> <https://oxfordbusinessgroup.com/overview/treasure-trove-complex-geography-provides-diverse-mix-rich-minerals>

## Iron and Steel

Over 300 Iron ore occurrences have been recorded in Myanmar and most of them are of minor importance. The iron ore deposits of Northern Shan State are residual type. At Kyatwinye, 22 meters thick limonite/hematite roll ores covering Devonian dolomite and sandstone. The reserve is about 3.0 mt with the grade of 54% Fe. At Pang Pet, near Taunggyi, the iron ore deposit is represented by primary hematite mineralisation bounded in two regional fault system in the Plateau limestone seem skarn type. Iron ore deposit at KathaingTaung, Lamaungof Phakhantand Taungnyoand Taungkadonof Shwegu area in Kachin state are related to the ultrabasic rocks<sup>34</sup>.

No.1 Iron and Steel Plant at Pyin Oo Lwin smelts iron ore from Kyatwinye iron mine located 26 miles to the South East of Pyin Oo Lwin. No.1 iron steel plant produces sponge iron, pig iron and steel, steel grinding balls and steel round bars. The products are used locally for construction works.

## Limestone

Two types of limestone are produced in Myanmar depending on the physical properties. Limestone which has a high calcium content with no outstanding physical appearance is used as raw material for cement production while limestone with inclusions giving rise to beautiful a texture and colour is used as decoration limestone, known as dimension stones. One of the outstanding decoration qualities of limestone mine is situated near Loikaw. Limestone production is sufficient for the local cement industry.

The main limestone mines are located in Ayeyarwady, Kayin, Mandalay and Shan region.

## Pearl

Myanmar has been a producer of white and golden South Sea cultured pearls from the Pinctada maxima oyster since the 1950s. According to the Myanmar Pearl Enterprise<sup>35</sup>, there is Four kinds of cultured pearls:

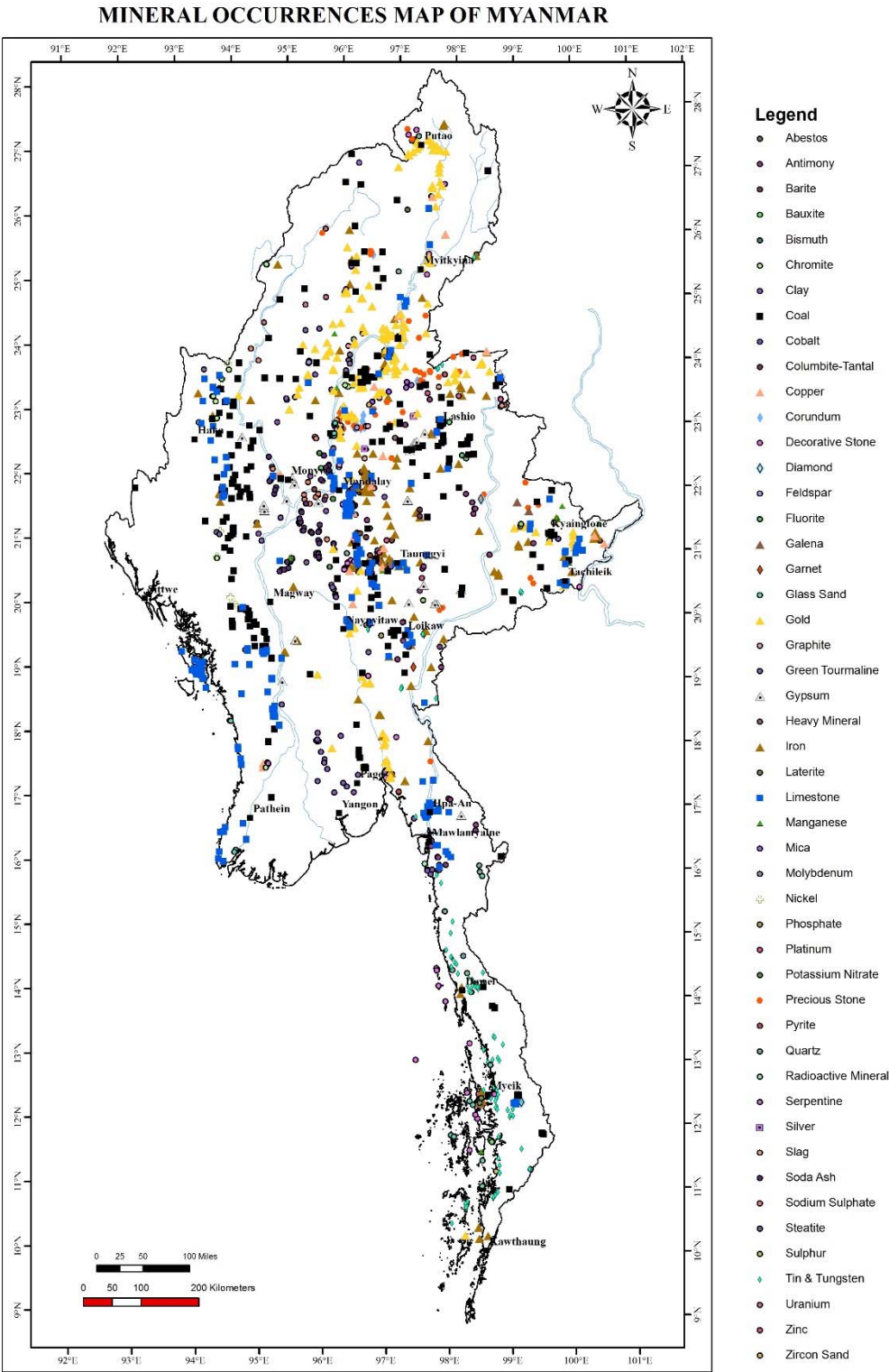
- Freshwater cultured pearl;
- Akoya cultured pearl;
- Tahitian cultured pearl; and
- Cultured pearl of the South Seas.

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<sup>34</sup> <http://aseanmining.dpim.go.th/dokuwiki/doku.php?id=myanmar:start>

<sup>35</sup> <https://www.myanmarpearl.com/index.php/en/2015-05-26-06-25-44>

Chart 21: Mineral occurrences map of Myanmar



### 3.3.3. Main mining projects

The main mining projects in Myanmar can be summarised in the table below:

Table 69 : Main mining projects

Commodity	Project name	Location	Company operating	Description
Gold	Modi Momi Gold Mine Project	Yamethin Township	National Prosperity Company limited	Gold mining, exploration, ore production, drilling, crushing & refining business at Narbu Taung Mining Plot (Acres 600) being under the large-scale area of gold mining project owned by National Prosperity Gold Production Group Company Limited, located at Modi Momi, Yamaethin Township, Mandalay Region. A survey of the concession estimates it holds more than 2.3m oz of gold. The largest gold miner the National Prosperity Gold Production Group which operates the Modi Momi mine, with a total processing capability of 400 ounces of gold per day.
Copper	Monywa Copper Project	Letpadaung, Salingyi Township, Sagaing Region	Wanbao Mining Ltd (Wanbao Mining) in joint venture with a Myanmar company, the Union of Myanmar Economic Holdings Limited (UMEHL)	There are four large deposits of copper in the Monywa district, in Sagaing Region, north western Myanmar. They are situated in hills that rise out of the flood plain of the Chindwin River. These deposits have been developed as two, linked mining operations - the Letpadaung and S&K copper mines. Letpadaung is the largest of the four deposits and accounts for 75% of the total copper reserves. It is expected to produce 100,000 tonnes of cathode copper a year. Work to develop the Letpadaung mine began in 2011, and though the mine is still under construction it produced its first copper in May 2016. The three other deposits are located next to each other and have been developed since 1978 as the S&K mine. Since 2010, China-based Wanbao Mining Ltd (Wanbao Mining) has owned the two copper mines in joint venture with a Myanmar company, the Union of Myanmar Economic Holdings Limited (UMEHL), and the state-owned company, Mining Enterprise 1 (ME1). Under the current production sharing contract (modified in July 2013) Wanbao Mining and UMEHL retain 49% of the profits and the remaining 51% goes to the Government of Myanmar, represented by ME1.
Zinc	Longh Keng zinc mine and Lashio zinc refinery project	Township of Lashio	Cornerstone Resources (Myanmar) Ltd	The long Keng zinc mine covers 8 km <sup>2</sup> of highly prospective ground and hosted two surface outcrops of high-grade smithsonite with a historical Inferred Resource of 170,000 tonnes at an average grade of 37% zinc for a total metal content of 63,000 tonnes. The ore is presently being processed at the Lashio Zinc refinery. The Lashio Zinc refinery has a capacity of 10,000t of LME (99.99% zinc) refined zinc per annum with plans to scale up capacity to 18,000t of refined zinc per annum. Lashio is the only modern zinc refinery plant with Myanmar's highly prospective Shan Plateau zinc and base metal province.
Nickel	Tagaung Taung Nickel Mine Project	Thabeikying, Mandalay	MYANMAR CNMC NICKEL COMPANY LIMITED	The Tagaung Taung nickel mine has a reserve of more than 30 million tons of high-grade nickel ore containing some 700,000 tons of nickel. The US\$800 million project has an annual output of 85,000 tonnes of ferronickel. The mine went into operation in 2009 under a production-sharing contract between the No. 3 Mining Enterprise of the Ministry of Mines and state-owned China Nonferrous Metal Mining Co.
Coal	Kalewa Coal Mine Project	Kalewa, Sagaing Region	Tun Thwin Mining	The reserve estimated at 100 million tons, the Kalewa Coal Mine Project is the major coal mine which covers an area of 4,500 acres in the Kalewa area, approximately 200 miles North West of Mandalay producing more than 100,000 tons of coal per year.
Tin	Heinda Tin Mining Project	Dawei, Tanintharyi Region	Myanmar Pongpipat Co	The Heinda Mine, 25 km NE of Dawei, is a major open-pit placer tin mine that has been continuously operated for over 100 years and is still a major producer today. Since 1999, Heinda has been operated by Myanmar Pongpipat Co. a Thai company. Shan States tin within the Shan States in eastern Myanmar, tin-bearing granites have been reported. Major Shan producing areas include the Man Maw tin district



Commodity	Project name	Location	Company operating	Description
Iron	Pinpet Mount Iron Mining Project	Shan State		The Pinpet Mining Project is an open-pit iron ore mine in Mount Pinpet, Shan State. The Pinpet deposit consists of an estimated 10 million tons of hematite with 56.4% iron and reserves of limonite at 70 million tons with 42.6% iron. The mountain also has an estimated deposit of 30 million tons of limestone, which can be used to make cement.
Base metal	Bawdwin Mine Project	Namtu, Shan State	Win Myint Mo Industries	The Bawdwin base metal mine in Namtu, northern Shan State, is a world-class mineral site with significant zinc, lead, silver and copper deposits. The mine is also expected to produce some nickel and cobalt. The polymetallic deposit has a JORC resource of 94Mt at 4.2 per cent Pb, 107g/t Ag, 2.1 per cent Zn and 0.2 per cent Cu, according to the latest deposit estimates made at the site. Resource estimates at the site have continued to trend upwards over the past two years. The mine saw signs of new life in 2017 when Perth-based Myanmar Metals paid local company Win Myint Mo Industries a \$1.5 million deposit for the option to acquire an 85 per cent interest in the project. At that time, Myanmar Metals owned the concession to operate the mine. Myanmar Metals later exercised the option in June 2018, acquiring a 51 per cent participating interest in the project. The company ultimately formed a joint venture with Win Myint Mo Industries and East Asia Power (Mining) known as the Bawdwin Joint Venture (BJV). The project site is approximately 38 square kilometres. The relatively high grades found at the site thus far could put the mine in the first quartile of all large-scale underground and open-pit mines in the world in terms of grade and resource size.

### 3.3.4. Context of the Artisanal Mining Sector (AMS)

Myanmar's ASM sector is a major contributor to the country's economy. Experts estimate that the sector is worth hundreds of millions of dollars annually and supports the livelihoods of millions of people. Like many countries with large ASM populations, Myanmar struggles with high levels of informality. Experts estimate that over 90 percent of mining in Myanmar is informal. Most miners operate without legal permits from the government. ASM is associated with serious environmental, social and governance challenges<sup>36</sup>.

ASM plays an important role in Myanmar's mining sector. In 2016 and 2017 ASM permits made up over 90 percent of official government issued production permits in the mining sector. A recent study by Pact estimates that the sector accounts for most gold, tin and industrial mineral production.

The sector employs hundreds of thousands of people and supports the livelihoods of millions. In gold and tin mining, ASM accounts for as much as 95 percent and 80 percent, respectively, of employment in 2016 to 2017. While ASM operations are spread across Myanmar, the highest concentrations are in Kachin, Mandalay, Sagaing, Shan and Tanintharyi.

Historically, Myanmar's legal framework for the minerals sector was highly centralised. Government policy largely ignored ASM. Following amendments to Myanmar's constitution, the 2015 Myanmar Mines Law and 2018 Mines Rules, the Myanmar government recently decentralised responsibilities for issuing artisanal and small-scale mining (ASM) permits to the country's states and regions. If well managed, decentralisation could make government policy more sensitive to the needs and concerns of miners and the communities impacted by mining activity.

The passage of the amended Myanmar Mines Law in 2015 and promulgation of the accompanying Mines Rules in February 2018 provide the legislative and regulatory framework for the decentralisation of powers of granting permits in the ASM sector. The law grants state and regional permit scrutiny boards the power to award ASM permits. According to a MONREC notification, the boards comprise the state and regional MONREC minister, a representative each from GAD, Department of Agricultural Land Management and Statistics, Forest Department, ECD and Department of Mines and an additional official appointed by the state and regional government. The Minister chairs the board while the state and Regional Director of the Department of Mines is the Secretary<sup>37</sup>.

The mines law sets out the legal definitions of artisanal and small-scale mining. The law defines small-scale mining as commercial minerals production by companies with low capital investment and production volumes. The law defines artisanal mining as minerals production by individuals using only ordinary hand tools and basic machinery.

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<sup>36</sup> Unpacking Decentralization: Improving How States and Regions in Myanmar Issue Artisanal and Small-scale Mining Permits; NRG, October 2019

<sup>37</sup> Unpacking Decentralization: Improving How States and Regions in Myanmar Issue Artisanal and SmallScale Mining Permits; NRG, October 2019.



The most important criteria used to classify different mines is the acreage of a permit. Table below shows acreage limits used for different permits. Small-scale production permits are valid for five to 10 years, depending on the mineral being produced and can be renewed for a maximum of two years per renewal.

**Table 70: AMS type of permits**

Permit type	Maximum permit size	Length of tenure
Small scale		
Gold and other precious metals	Up to four acres	Five to 10 years (plus two years extensions)
Other metals	Up to 10 acres	
Industrial Minerals	Up to 20 acres	
Artisanal		
Gold and other precious metals	Up to one acres	One year
Other metals	Up to three acres	
Industrial Minerals	Up to five acres	

The most important criteria used to classify different mines is the acreage of a permit. The table below shows acreage limits used for different permits. Small-scale production permits are valid for five to 10 years, depending on the mineral being produced and can be renewed for a maximum of two years per renewal. The mines rules state that renewals can be issued by state and regional scrutiny boards in consultation with Union MONREC but provide no further detail on the steps and costs involved. The rules make reference to the possibility of extending artisanal permits but do not provide any additional details (e.g., the length of these extensions). The mines rules also give states and regions the right to issue small-scale exploration permits.

### 3.3.5. Legal and fiscal framework

#### Mining sector

#### Legal framework

The mining sector is governed by the following laws:

- 1994 Myanmar Mines Law<sup>38</sup>
- 1996 Myanmar Mines Rules<sup>39</sup>
- 2015 Amendment of Myanmar Mines Law<sup>40</sup>
- 2018 Myanmar Mines Rules<sup>41</sup>

The Union of Myanmar Mines Law was promulgated in September 1994 and Rules relating to the law followed in December 1996. The 1994 Myanmar Mines Laws covered prospecting, exploration, large scale, small scale and artisanal mining.

On 24 December 2015 Myanmar's parliament (the Pyidaungsu Hluttaw) passed Law No. 72 'An Act Amending the Myanmar Mining Law' (2015 Mines Law). The 2015 Mines Law amends Myanmar's outdated 1994 Mines Law.

The 2015 Amended Myanmar Mines Law covered medium scale mining, feasibility study, processing and trading and some definitions were amended such as "minerals" where it includes metallic minerals extracted from the rivers, creeks, ponds and lake basement, "permit" where it got extended to feasibility studies, processing and trading, "feasibility studies" which includes study on commercial viability such as extraction, processing, financials, environmental and social impact, "trading" where it means buying, selling, transport and storage of metallic minerals,

<sup>38</sup>[http://www.mining.gov.mm/LAWS\\_mm/1.LAWS\\_mm/Mining\\_Law\\_Book\\_Eng\\_Myan.pdf](http://www.mining.gov.mm/LAWS_mm/1.LAWS_mm/Mining_Law_Book_Eng_Myan.pdf)

<sup>39</sup>[http://www.mining.gov.mm/LAWS\\_mm/1.LAWS\\_mm/RULE\\_2018.pdf](http://www.mining.gov.mm/LAWS_mm/1.LAWS_mm/RULE_2018.pdf)

<sup>40</sup><http://www.myanmar-law-library.org/law-library/laws-and-regulations/laws/myanmar-laws-1988-until-now/union-solidarity-and-development-party-laws-2012-2016/myanmar-laws-2015/pyidaungsu-hluttaw-law-no-72-2015-law-amending-the-myanmar-mining-law-burmese.html>

<sup>41</sup><https://www.slideshare.net/aung3/myanmar-mining-law-2018-in-burmese-update-1332018>

“artisanal mining” where basic mechanical mining practices are covered instead of production using ordinary hand tools.<sup>42</sup>

According to the 1994 mining law, foreign investors were allowed to invest as joint venture partners in large scale mining depending on the quality and quantity of mineral deposit. The 2015 Mines Law allows for foreign shareholding in previously restricted mining related activities namely the trading and processing of minerals.

Large scale mining permits were granted for up to 25 years and small-scale mining permits for up to five years. The 2015 Mines Law provides for an increase in permit periods for both large-scale and small-scale production. Large-scale production permits, available for up to 25 years under the 1994 Mines Law, are now available for up to 50 years. Small-scale production permits, available for up to 5 years under the 1994 Mines Law, are now available for up to 10 years.

Prospecting permits remained the same for one year, exploration permits for three years and artisanal permits for one year with options to extend for up to four times.<sup>43</sup>

Currently, there is no formal written mineral policy that would be comparable to the GOUM Energy Policy. However, MoM has a “policy direction”. This policy direction sets out the government’s overall privatisation goals, which are to encourage private sector investment into the mining sector and to avoid reliance on public sector funds. It is the policy of the Ministry of Mines not to make new investment on its own, but to encourage foreign and local investors to invest in the mining sector.

The forms of agreement may be generally on production sharing basis or profit-sharing basis, depending on equity contribution by both parties. Production sharing type of investment could either be straight split on total production or after cost recovery. The Ministry of Mines is flexible whether to have majority, minority or equal participation in equity participation joint ventures, depending on a case by case basis.

Any application for the award of a mining permit is subject to the signing of a production sharing or profit-sharing arrangements with MoM.

MoM can enter into agreements with mining operators through joint ventures with state owned enterprises (Mining Enterprise 1 and Mining Enterprise 2) on a production sharing basis. However, these joint ventures only happen for the most significant large-scale projects.

In addition to the Mining Legislations cited above, the following key legislations are relevant to the mining industry in Myanmar:

- Constitution of Myanmar (2008);
- Income tax legislation;
- Foreign investment legislation;
- Companies legislation;
- State-owned Economic Enterprises Law 1989;
- Myanmar Official Secrets Act 1923;
- Environmental Conservation Law 2012; and
- Contract Act 1872.
- Law n° 45/2015 Amending the Constitution; and
- Notifications of Myanmar Investment Commission (MIC).

### **Fiscal framework**

Royalties are based on ad valorem sales and the rates changed under the 2015 Amended Myanmar Mines Law. Operators were required to pay royalties either in cash or in-kind. Under the 1994 Mines Law, gold, platinum, uranium and silver were subject to 4%-5%, iron, zinc, copper, lead, tin, tungsten, nickel, antimony and alluvium at 3%-4%, gemstones and jade at 5%-7.5% and industrial minerals or stones at 1%-3%. Under the 2015 Amended Mines Law, royalty on gold, platinum and uranium is fixed at 5%, silver, copper, tungsten, nickel at 4%, iron, zinc, and lead, antimony and

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<sup>42</sup>[http://www.mining.gov.mm/LAWS\\_mm/1.LAWS\\_mm/Mining\\_Law\\_Book\\_Eng\\_Myan.pdf](http://www.mining.gov.mm/LAWS_mm/1.LAWS_mm/Mining_Law_Book_Eng_Myan.pdf)

<sup>43</sup>[http://www.mining.gov.mm/LAWS\\_mm/1.LAWS\\_mm/Mining\\_Law\\_Book\\_Eng\\_Myan.pdf](http://www.mining.gov.mm/LAWS_mm/1.LAWS_mm/Mining_Law_Book_Eng_Myan.pdf)

alluvium at 3% and industrial minerals or gemstones at 2%.<sup>44</sup> The table below indicates the Evolution of the royalty rate range between 1994 and 2015 Mines Law.

**Table 71: Evolution of the royalty rate range**

1994 Mines Law		2015 Mines Law	
Mineral	Royalty Rate Range	Mineral	Royalty Rate Range
Gold, platinum uranium, and silver	4 - 5%	Gold, platinum, uranium.	5%
Iron, zinc, copper, lead, tin, tungsten, nickel, antimony, aluminium	3 - 4 %	Silver, copper, lead, tungsten, nickel, heavy sands and others	4%
Gemstones and jade	5 - 7.5%	Iron, zinc, lead, tin, tungsten, aluminium, arsenic, manganese, cobalt and others	3%
Industrial minerals or stone	1 - 3 %	Raw industrial minerals or stones	2%

The 2015 Amended Mines Law encourages profit sharing rather than production sharing while 1994 Mines Law and 1996 Mines Rules prescribed for production sharing. Operators that enter into PSCs are responsible for 100% of production costs and are required to share a certain percentage of production to the relevant mining enterprises.

The Government receives revenue from mineral companies both in cash and in-kind. Dead rents are payable from Year 1 exploration under the Mines Rules. Performance bank guarantees and signature bonuses are prescribed under PSCs but is not prescribed in the 2015 Amended Mines Law.<sup>45</sup>

The following taxes are collected from mineral companies:<sup>46</sup>

- income tax on taxable income is 25% unless there is tax exemption granted through MIC permit. Capital gains tax on gains derived from the disposal of capital assets are 10%; and
- commercial tax is 5% on domestic sales of minerals if turnover exceeds MMK 50 million in a financial year. For minerals, commercial tax is levied at zero percent on export.

In addition to the taxes collected, the government receives application fees, royalties, dead rent and license fees in cash from the permit holders and state contribution from the ME (1) and the ME (2). We understood from the initial meetings held with DOM and mining enterprises that the only in-kind royalty payments in FY 2016-2017 were from mining permits holders of copper, nickel, gold, tin and tungsten.<sup>47</sup>

### **Social and environmental provisions in the Mines Law and Rules**

The 2015 Amended Mines Law requires joint venture operators to commit in environmental impact assessments and required feasibility studies to include information on social and environmental impact in the project proposed that showed an additional oversight on the feasibility studies. The Chief Inspector is responsible for inspecting system and controls for social and environmental impacts from the mining project under the 2015 Amended Mines Law. Operators are required to establish environmental/ social fund and fund for mines closure and rehabilitation while there is not enough prescription on site rehabilitation.<sup>48</sup>

<sup>44</sup>[http://www.mining.gov.mm/DM\\_mm/1.DM\\_mm/Details.asp?submenuID=8&sid=186](http://www.mining.gov.mm/DM_mm/1.DM_mm/Details.asp?submenuID=8&sid=186)

<sup>45</sup><http://www.myanmar-law-library.org/law-library/laws-and-regulations/laws/myanmar-laws-1988-until-now/union-solidarity-and-development-party-laws-2012-2016/myanmar-laws-2015/pyidaungsu-hluttaw-law-no-72-2015-law-amending-the-myanmar-mining-law-burmese.html>

<sup>46</sup>2016 Union Tax Law

<sup>47</sup>Meeting held in Nay Pyi Taw with the DOM, the ME (1), the ME (2), the MGE and the MPE

<sup>48</sup><http://www.myanmar-law-library.org/law-library/laws-and-regulations/laws/myanmar-laws-1988-until-now/union-solidarity-and-development-party-laws-2012-2016/myanmar-laws-2015/pyidaungsu-hluttaw-law-no-72-2015-law-amending-the-myanmar-mining-law-burmese.html>

Several subsections were added by the 2015 amendments to the Mines Law which are intended to increase the scope of environmental and social responsibility of the mine operator.

- addition to Section 13e (1) requiring mines to minimise environmental damage and negative impacts on local communities, and to make an annual contribution to a fund for environmental conservation.
- An additional requirement (Section 13e (2) to contribute to a Mine Closure Fund for environmental rehabilitation and reforestation.

The Mines Rules contain (identical) requirements in Rule 51c (large-scale), 67c (mediumscale) and 85c (small-scale) for the company to submit at the time of its application for a Production Permit the evidence that it has undertaken negotiations with local communities about local social responsibility, and obtained their agreement.

### Gems and jade

Most of the world's supply of rubies and jade are sourced from Myanmar. However, the Myanmar government prohibits the extraction of precious gems by foreign investors. Myanmar rubies and jadeite command the highest prices on international markets and Myanmar is the world's largest source of jadeite, accounting for an estimated 90% of global production as per Global Witness research<sup>49</sup>.

Gems and jade extraction, sales of rough gems and jade, cutting and polishing, sales of polished gems and jade, making jewellery and sales of jewellery in Myanmar are governed by the following laws and regulations:

- 1995 Myanmar Gemstone Law<sup>50</sup>
- 1995 Myanmar Gemstone Rules
- 2003 Amendment of Myanmar Gemstone Law<sup>51</sup>
- 2016 Second Amendment of Myanmar Gemstone Law<sup>52</sup>
- 2019 Myanmar Gemstone Law<sup>53</sup>

Pursuant to the 1995 Myanmar Gemstone Law, MONREC is to designate gemstone tract and gemstone blocks to determine the tenure of permit, floor price of gemstone block and invite competitive bids for gemstone blocks.

There are two types of licenses under the Myanmar Gemstone Law: gemstone extraction permits and gemstone trading licenses. The law intends to develop the whole value chain of gemstones in Myanmar while eradicating illegal extraction and trade. Extraction of ruby, sapphire, jade and diamonds are subject to a 20% royalty on production and others 10%.<sup>54</sup>

The enactment of the Myanmar Gemstone Law supersedes the Mining Law as such the Mining Law is no longer applicable to the gems sector effective in the year 1995. The Myanmar Gemstone Law was amended in 2003 and was later on amended in 2016. The significant changes in the second amendment is categorising gemstones into rough, cut and polished and jewellery and products made with gemstones. The 1995 Myanmar Gemstone Rules supported Myanmar Gemstones Law and technical guidance and procedures were prescribed. The Myanmar Gemstones Law was enacted on 30 January 2019. MGE is responsible for drafting rules and regulations.<sup>55</sup> As was the case under the 1994 Mines Law royalty rates do not vary with mine size.

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<sup>49</sup> <https://www.globalwitness.org/jade-story/>

<sup>50</sup> [http://www.burmalibrary.org/docs15/1995-SLORC\\_Law1995-08-Myanmar\\_Gemstone\\_Law-en.pdf](http://www.burmalibrary.org/docs15/1995-SLORC_Law1995-08-Myanmar_Gemstone_Law-en.pdf)

<sup>51</sup> [http://www.myanmar-law-library.org/IMG/pdf/myanmar\\_laws\\_2003.pdf](http://www.myanmar-law-library.org/IMG/pdf/myanmar_laws_2003.pdf)

<sup>52</sup> <http://www.myanmar-law-library.org/law-library/laws-and-regulations/laws/myanmar-laws-1988-until-now/union-solidarity-and-development-party-laws-2012-2016/myanmar-laws-2016/pyidaungsu-hluttaw-law-no-23-2016-second-amendment-to-the-myanmar-gemstone-law.html>

<sup>53</sup> [http://www.myanmar-law-library.org/IMG/pdf/myanmar\\_gemstone\\_law.pdf](http://www.myanmar-law-library.org/IMG/pdf/myanmar_gemstone_law.pdf)

<sup>54</sup> [http://www.mining.gov.mm/DM\\_mm/1.DM\\_mm/Details.asp?submenuID=8&sid=186](http://www.mining.gov.mm/DM_mm/1.DM_mm/Details.asp?submenuID=8&sid=186)

<sup>55</sup> [http://www.myanmar-law-library.org/IMG/pdf/myanmar\\_laws\\_2003.pdf](http://www.myanmar-law-library.org/IMG/pdf/myanmar_laws_2003.pdf)

**Table 71 : Evolution of the royalty rate range**

1994 Mines Law		2015 Mines Law	
Mineral	Royalty Rate Range	Mineral	Royalty Rate Range
Gold, platinum uranium, and silver	4 - 5%	Industrial minerals or stone	5%
Iron, zinc, copper, lead, tin, tungsten, nickel, antimony, aluminium	3 -4 %	Silver, copper, tungsten, nickel	4%
Gemstones and jade	5 - 7.5%	Iron, zinc, lead, antimony, aluminium	3%
Industrial minerals or stone	1 -3 %	Industrial minerals or gemstones	2%

The 2015 Mines Law allows for foreign shareholding in previously restricted mining related activities namely the trading and processing of minerals.

The 2015 Mines Law provides for an increase in permit periods for both large-scale and small-scale production. Large-scale production permits, available for up to 25 years under the 1994 Mines Law, are now available for up to 50 years. Small-scale production permits, available for up to 5 years under the 1994 Mines Law, are now available for up to 10 years.

We gathered from the initial meetings with DOM, that it and MGE receive revenues from the gems and jade companies both in cash and in-kind. Income tax, capital gains tax, specific goods tax, commercial tax and withholding tax are collected in cash by IRD. Customs duties are collected in cash upon imports by MCD, commercial tax and Special goods tax for the IRD.

The following taxes are collected from companies:<sup>56</sup>

- income tax on taxable income is 25% unless there is tax exemption granted through the MIC Permit. Capital gains tax on gains derived from the disposal of capital assets is 10%;
- Specific Goods Tax of 10% is charged on rough gemstones, 5% on finished goods produced, sales and exports.
- Specific goods tax paid upon production can be offset against the specific goods tax due upon sales and export; and
- a 5% Commercial tax is imposed on domestic sales of gems and jewellery if turnover exceeds MMK 50 million. For gems and jewellery, commercial tax is levied at zero per cent on export.

In addition to the taxes, the government receives application fees, royalties, dead rent and license fees from permit holders and state contribution from MGE. There is an in-kind royalty payment in FY 2016-2017 from jade companies.

The Gemstone Sector Supporting Committee was formed following notification 106/ 2017 on 9 November 2017 with 22 members represented from: Union Ministries, Gems and Jewellery Entrepreneurs Association and civil society by Ministry of Natural Resources and Environmental Conservation. A series of workshops have been conducted in different regions in order to collect inputs from stakeholders for the gemstone policy that will be drafted with assistance from foreign experts. Monthly meetings were held where several issues were discussed and debated in order to obtain consensus on the framework of the gemstone policy. The Myanmar Gemstone Policy statement was drafted with the 36 statements from the following 16 topics that were published to the general public for comments and suggestions until 18 January 2019.

The new Myanmar Gemstones Law was enacted on 30 January 2019. It was criticised that it did not reflect a certain key issue of Draft Myanmar Gemstone Policy such as licensing criteria, transparency in the valuation process, conflicts of interest of the MGE roles both as a regulator and as a participant in the joint ventures and beneficial ownership disclosure.<sup>57</sup>

<sup>56</sup>2016 Union Tax Law

<sup>57</sup><https://www.globalwitness.org/en/press-releases/myanmars-flawed-new-gemstone-law-set-to-restart-gemstone-permits-in-tainted-sector/>

## Pearl

Pearl has six types of functions that need licenses and three types of activities that need to be registered, all of which are regulated under Myanmar Pearl Law<sup>58</sup> and Myanmar Pearl Rules.<sup>59</sup> The Myanmar Pearl Law was enacted in 1995 and was amended in 2014 and again in 2018 while the Myanmar Pearl Rules was approved in 2000 and was amended in 2015 and 2016 following the restructuring of MPE and the Ministry.

The Myanmar Pearl Law 1995 has 13 Chapters and it specifies the license application and approval process, responsibilities of licensees and owners of registered vessels and registered technicians and divers, designation of oyster fishing ground, functions of MPE, Inspector General and Inspectors, administrative actions and penalties. The Myanmar Pearl Rules contain seven chapters and elaborate on the license application and approval process, responsibilities of licensees, registration application and approval process, responsibilities of registration holders, designation of oyster fishing ground and valuation team along with different application forms and license/registration forms with regulations.<sup>60</sup>

The Government receives non-tax revenues from pearl companies in cash from the local companies and in-kind from foreign joint venture companies. Income tax on taxable income and capital gains, commercial tax, withholding tax are collected in cash by IRD. Customs duties are collected in cash upon import by MCD. There is no specific goods tax on certain key issues of Draft Myanmar Gemstone Policy:<sup>61</sup>

- income tax on taxable income is 25% unless there is tax exemption granted through the MIC Permit. Capital gains tax of 10% arise on gains derived from the disposal of capital assets ; and
- commercial tax of 5% is payable on domestic sales of minerals where turnover exceeds MMK 50 million in a financial year. For pearls, commercial tax is levied at zero percent upon export.

In addition to the taxes, the government receives application fees, royalties, dead rent and license fees from the permit holders and state contributions from MPE. Only production split is received as in-kind from the foreign joint venture companies. 75% of the pearl produced is allowed to be exported.

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<sup>58</sup>[http://www.mining.gov.mm/LAWS\\_mm/1.LAWS\\_mm/Pearl\\_Law\\_Myanmar.pdf](http://www.mining.gov.mm/LAWS_mm/1.LAWS_mm/Pearl_Law_Myanmar.pdf)

<sup>59</sup>[http://www.mining.gov.mm/LAWS\\_mm/1.LAWS\\_mm/The\\_Myanmar\\_Pearl\\_Rules.pdf](http://www.mining.gov.mm/LAWS_mm/1.LAWS_mm/The_Myanmar_Pearl_Rules.pdf)

<sup>60</sup>[http://www.mining.gov.mm/LAWS\\_mm/1.LAWS\\_mm/Pearl\\_Law\\_Myanmar.pdf](http://www.mining.gov.mm/LAWS_mm/1.LAWS_mm/Pearl_Law_Myanmar.pdf)

<sup>61</sup>2016 Union Tax Law

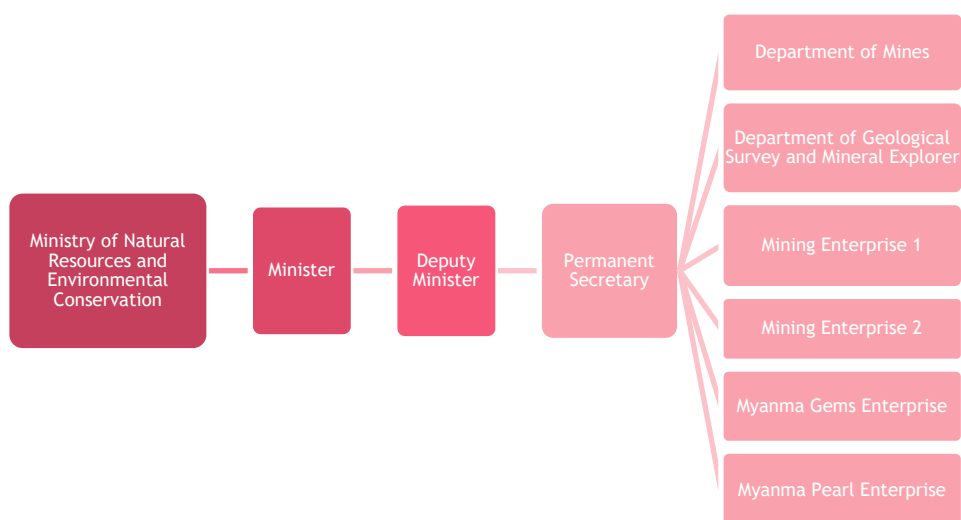
### 3.3.6. Institutional framework

The Ministry of Mines (now under MONREC) is the Government Agency responsible for implementing GOUM's mineral policy, for planning and for enforcing the laws and regulations related to the mining sector.

The Ministry evaluates and processes all licence applications for the prospection and production of minerals (value added processing) in accordance with the 1994 Mining Law. It also monitors production operations and promotes investment in the minerals sector. According to the Mining Law, any naturally occurring minerals found on or under the ground and on Myanmar's continental shelf belong to the State of Myanmar.

The ministry is structured as follows:

Chart 21: MONREC Organisational Structure (Mineral Affairs)



State Enterprises rely on a production sharing contract (PSC) system with private companies, by which 100% of the investments are borne privately and profits are shared between the two parties. According to GOUM officials, all mines are now either JVs or have been privatised and State Enterprises are no longer involved in the mining operations.

The functions of every department under the Ministry of Natural Resources and Environmental Conservation<sup>62</sup>(MONREC) are set out in the table below:

Table 72 : Function of departments under the MONREC

Sr.	Departments	Responsibilities
1	Department of Mines (DOM)	<ul style="list-style-type: none"> <li>·Mining policy</li> <li>·Monitoring</li> <li>·Collecting taxes and revenue</li> <li>·Salt and other mineral salts</li> <li>·Chief Inspector</li> </ul>
2	Department of Geological Survey and Mineral Exploration (DGSE)	<ul style="list-style-type: none"> <li>·Geological Survey</li> <li>·Minerals exploration</li> </ul>
3	Mining Enterprise 1 (ME 1)	<ul style="list-style-type: none"> <li>·Cadmium</li> <li>·Copper</li> <li>·Antimony</li> <li>·Chromium</li> <li>·Mercury</li> <li>·Iron</li> <li>·Zinc</li> <li>·Aluminium</li> </ul>

<sup>62</sup>[http://www.mining.gov.mm/Minister\\_Office\\_mm/4.Minister\\_Office\\_mm/Details.asp?submenulD=6&sid=62](http://www.mining.gov.mm/Minister_Office_mm/4.Minister_Office_mm/Details.asp?submenulD=6&sid=62)



Sr.	Departments	Responsibilities
		<ul style="list-style-type: none"> <li>·Lead</li> <li>·Silver</li> <li>·Tellurium</li> <li>·Nickle</li> <li>·Magnesium</li> <li>·Manganese dioxide</li> </ul>
		<ul style="list-style-type: none"> <li>·Arsenic</li> <li>·Coal</li> <li>·Graphite</li> <li>·Glass sand</li> <li>·Limestone</li> <li>·Barite</li> </ul>
4	Mining Enterprise 2 (ME 2)	<ul style="list-style-type: none"> <li>·Tin</li> <li>·Tantalum-niobium</li> <li>·Titanium</li> <li>·Vanadium</li> <li>·Bismuth</li> <li>·Molybdenum</li> <li>·Rare earth elements</li> <li>·Radioactive minerals</li> </ul>
		<ul style="list-style-type: none"> <li>·Rubidium</li> <li>·Lithium</li> <li>·Hafnium</li> <li>·Indium</li> <li>·Gold</li> <li>·White gold</li> <li>·Tungsten</li> <li>·Heavy metal</li> </ul>
5	Myanma Gems Enterprise (MGE)	<ul style="list-style-type: none"> <li>·Ruby</li> <li>·Sapphire</li> <li>·Jade</li> <li>·Assorted gems</li> </ul>
6	Myanma Pearl Enterprise (MPE)	<ul style="list-style-type: none"> <li>·Pearl</li> <li>·Oyster shell</li> </ul>

In March 2016, it was announced that the Ministry of Mines and the Ministry of Environmental Conservation and Forestry (MOECF) would be merged into one ministry with the new incoming NLD government. The ministry is now called the Ministry of Natural Resources and Environmental Conservation (MONREC).

The Director General is the Chief Inspector of Mines under the Myanmar Mines Law and is responsible for scrutinising applications and granting of permits.<sup>63</sup>

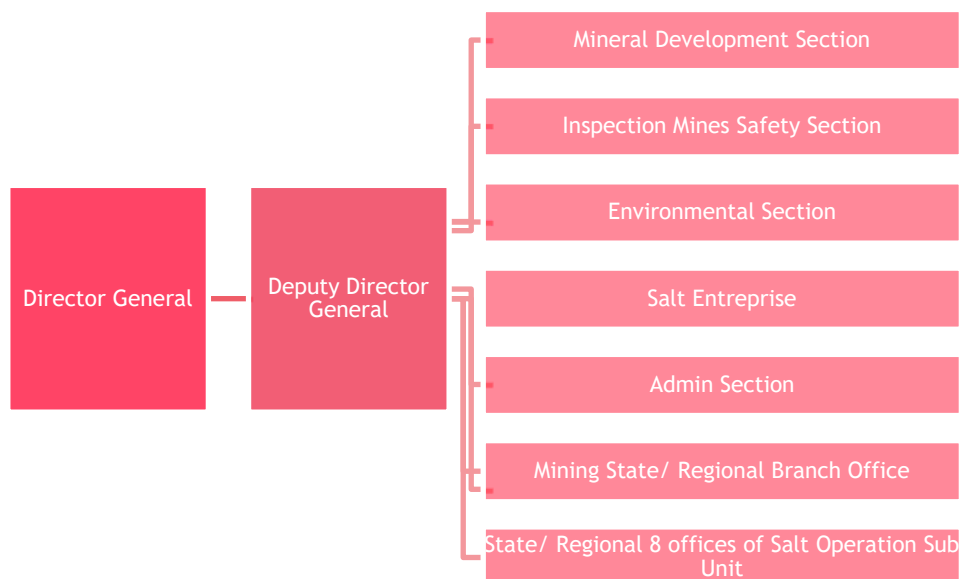
DOM comprises five sections: the Mineral Development Section, the Inspection Section, the Mineral Conservation and Environmental Control Section, the Salt Section and the Administration and Accounts Section.

<sup>63</sup>[http://www.mining.gov.mm/DM\\_mm/1.DM\\_mm/Details.asp?submenuID=8&sid=35](http://www.mining.gov.mm/DM_mm/1.DM_mm/Details.asp?submenuID=8&sid=35)



The Organisation Structure of DOM is presented as below<sup>64</sup>

**Chart 22: DOM Organisational Structure**



The duties and functions of the various sections falling under DOM are as follows<sup>65</sup>:

**Table 73: Function of the DOM**

No.	Sections	Duties and Functions
1	Mineral Development Section	<p>Increase the development of the mineral sector as directed for local and foreign investment.</p> <p>Scrutinise the application for all permits in accordance with Myanmar Mines Law.</p> <p>Amendment of promulgated laws and regulations as and when necessary so that they are efficient at all times and in any conditions.</p> <p>Perform activities relating to international mining industry including ASEAN countries.</p> <p>Train technicians at all level of operations in the mining sector.</p> <p>Carry out co-operations on relief to increase mineral products.</p>
2	Inspection Mines Safety Section	<p>Perform inspections on individuals, companies and associations that have been granted a license</p> <p>Report the inspection work</p>
3	Environmental Section	Carry out the inspection of Mineral conservation

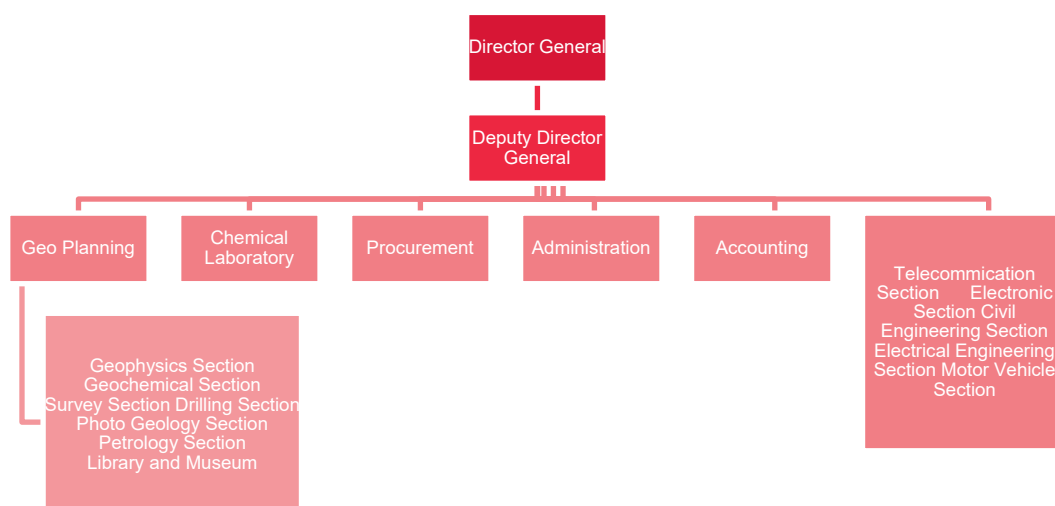
<sup>64</sup>[http://www.mining.gov.mm/DM\\_mm/1.DM\\_mm/Details.asp?submenuID=8&sid=166](http://www.mining.gov.mm/DM_mm/1.DM_mm/Details.asp?submenuID=8&sid=166)

<sup>65</sup>[http://www.mining.gov.mm/DM\\_mm/1.DM\\_mm/Details.asp?submenuID=8&sid=180](http://www.mining.gov.mm/DM_mm/1.DM_mm/Details.asp?submenuID=8&sid=180)

No.	Sections	Duties and Functions
		Protect the environmental conservation works that may have detrimental effects due to mining operations and procession plants
4	Salt Enterprise	Industrially used salt required for industries and annual consumer's salt- supplement-demand are now being fulfilled and permitted licenses on crude salt, table-salt, extra-mineral salts and fine salt productions are issued. To prevent the entire nation from iodine deficiency and its contribution of universal salt iodisation system has been practiced by making collaborative and cooperative effort with the Ministry of Health and UNICEF. Laboratory investigations are performed for detection of concentration of Sodium Chloride (NaCl) and Potassium Iodide (KIO <sub>3</sub> ). To provide consumer's annual salt demand and industrially employed raw salt extract demand, private salt manufacturing sectors are supervised. Technical support is availed for production of solar salt, various mineral salts and iodated salt.
5	Admin Section	It is responsible for staff affairs, administration for liaising with external departments, security, sports, payroll and expenditure, finance and budget affairs of the Ministry.

The Department of Geological Survey and Mineral Exploration (DGSE) is responsible for country wide geological mapping, mineral prospecting, exploration and joint venture with foreign companies in mineral exploration and feasibility study. DGSE has seven activities: geology, geochemistry, geophysics, analytical laboratory, drilling, surveying and hydrogeology and provides five types of services; geological survey, mineral deposit evaluation, laboratory and pilot plant test work, feasibility and technical assistance.<sup>66</sup> DGSE comprises five divisions: Geo-Planning Division, Chemical Laboratory Division, Procurement Division, Administrative Division and Accounting Division.

Chart 23: DGSE structure



The main functions of DGSE are geological mapping, mineral prospecting, mineral exploration, topographic survey, detail geological mapping, geochemical survey, geophysical survey, drilling, data assessment and evaluation and laboratory analysis<sup>67</sup>.

<sup>66</sup> [http://www.mining.gov.mm/DGSE\\_mm/1.DGSE\\_mm/Details.asp?submenuID=10&sid=36](http://www.mining.gov.mm/DGSE_mm/1.DGSE_mm/Details.asp?submenuID=10&sid=36)

<sup>67</sup> [http://www.mining.gov.mm/DGSE\\_mm/1.DGSE\\_mm/Details.asp?submenuID=10&sid=105](http://www.mining.gov.mm/DGSE_mm/1.DGSE_mm/Details.asp?submenuID=10&sid=105)

### 3.3.7. Types of mining permits

A person or organisation that wishes to carry out prospecting, exploration, large scale production, medium or small-scale production activities in relation to gemstones, metallic minerals, industrial minerals or stones, must apply for a permit.

Different permits are issued by the Ministry of Mines, depending on the type of activities, or on whether or not foreigners are involved, and each permit will specify the conditions and restrictions that the applicant is required to comply with.

2015 Amendment of Myanmar Mines Law and 2018 Myanmar Mines Rules, specifies nine types of permits that can be issued : prospecting permit, exploration permit, Feasibility Study, large scale production permit, medium scale production permit, small scale production permits, subsistence production permits, Mineral Processing Permit and Mineral Sale and Purchase Permit.

**Table 74 : Type of mining permits**

Permit Type	Definition	Validity period
Prospecting permit	This is issued to an individual or organisation desirous of carrying out prospecting operations of metallic minerals, industrial minerals or stones. The total area of land for which the permit is attributed must not exceed 2,100 km <sup>2</sup>	Period not exceeding 1 year
Mineral Exploration Permit	This is issued to an individual or an organisation desirous of carrying out exploration of metallic minerals, industrial minerals or stones. The total area of land for which the permit is attributed must not exceed 2,100 km <sup>2</sup>	Period not exceeding 3 years.
Feasibility Study	This is issued to an individual or an organisation desirous of examining a mineral deposit to ensure whether it can be mined commercially or not when mineral exploration and prospection have been completed to that deposit.	Period not exceeding 1 year
Large Scale Mineral Production Permit	This is issued to an individual or an organisation desirous of carrying out large scale production of metallic minerals, industrial minerals or stones. The total area of land for which the permit is attributed depends on investment on amount and ore Deposit.	Period between 15 years to 50 years
Medium Scale Mineral Production Permit	This is issued to an individual or an organisation desirous of carrying out medium scale production operation of metallic minerals, industrial minerals or stones. The total area of land for which the permit is attributed must not exceed 1 km <sup>2</sup>	Period between 10 years to 15 years
Small Scale Mineral Production Permit	This is issued to an individual or an organisation desirous of carrying out small scale production operation of metallic minerals, industrial minerals or stones. The total area of land for which the permit is attributed between 0.0161 to 0.08 km <sup>2</sup>	Period between 5 years to 10 years
Subsistence Mineral Production Permit	This is issued to an individual or an organisation desirous of carrying out subsistence mineral production operation of metallic minerals, industrial minerals or stones.	Period not exceeding 1 year
Mineral Processing Permit	This is issued to an individual or an organisation desirous to processing of metallic minerals, industrial minerals or stone.	Period between 15 years to 50 years
Mineral Sale and Purchase Permit	This is issued to an individual or an organisation desirous to carrying out large, medium and small scale sales and purchases of metallic mineral, industrial minerals or stones.	Not exceeding (3) years

### 3.3.8. Procedures for the award of mining permit

#### Other minerals

According the 2015 Mining Law and Rules, any person or organization desirous of carrying out prospecting, exploration, production operations of metallic minerals, industrial minerals or stone shall apply to the Ministry or to the Department depending of the type of minerals.

The 1996 Myanmar Mines Rules set out the procedural requirements for the application for various mining permits, including: (1) prospecting permits; (2) exploration permits; (3) large scale production permits; (4) small scale production permits; (5) subsistence scale production permits.

According the Active Licenses-permits as of 1st April 2017 to 31 March 2018, 243 mining permits were granted during 2017/2018. The table below indicates the details of those permits by type and commodity:

Permit type	Number of permit awarded during 2017/2018
<b>Exploration permit</b>	<b>36</b>
Antimony	2
Coal	3
Copper & Associated	1
Dolomite	2
Gold & Associated	1
Gypsum	2
Lead	2
Lead & Zinc Associated	4
Limestone	2
Manganese Dioxide	1
Tin & Tungsten	16
<b>Large scale production permit</b>	<b>1</b>
Gold	1
<b>Small scale production permit</b>	<b>198</b>
Antimony	17
Biotite	1
Bosite	1
Chromium	2
Clay	1
Coal	32
Copper	6
Gold	95
Gypsum	1
Lead	7
Lead & Associated	9
Lead & Zinc Associated	12
Manganese Dioxide	7
Tin & Tungsten	7
<b>Subsistence scale production permits</b>	<b>8</b>
Bentonite	1
Clay	6
Limestone	1
<b>Total</b>	<b>243</b>

The list of mining licenses including the list of recipients is presented in Annex 6.

### Description of the process for awarding the mining license

The application and granting procedure, i.e. application process, application requirements, granting process for each type of mining permit is defined by the 1994 Myanmar Mines Rules<sup>68</sup> as follows:

Type of mining permit	Chapter
Application and Granting of Mineral Prospecting Permit	2
Application and Granting of Mineral Exploration Permit	3
Application and Granting of Large-Scale Mineral Production Permit	4

<sup>68</sup> <http://displacementsolutions.org/wp-content/uploads/THE-MYANMAR-MINES-LAW-1994.pdf>

Type of mining permit	Chapter
Application and Granting of Small-Scale Mineral Production Permit	5
Application and Granting of Subsistence Mineral Production Permit	6

### Application with the New 2018 Mines Rules

The New 2018 Mines Rules set out the New certain procedural requirements for the application for various mining or mining-related permits, including: (1) prospecting permits; (2) exploration permits; (3) feasibility study permits; (4) large scale production permits; (5) medium scale production permits; (6) small scale production permits; (7) subsistence scale production permits; (8) mineral treatment permits; (9) mineral trading permits; and (10) integrated operations permits.

The application and granting procedure: application process, application requirements, granting process for each type of mining permit is defined by Myanmar Mines Rules 2018 as follows:

Type of mining permit	Chapter
Application and Granting of Mineral Prospecting Permit	3
Application and Granting of Mineral Exploration Permit	4
Application and Granting of Mineral Feasibility Study Permit	5
Application and Granting of Large-Scale Mineral Production Permit	6
Application and Granting of Medium Scale Mineral Production Permit	7
Application and Granting of Small-Scale Mineral Production Permit	8
Application and Granting of Subsistence Mineral Production Permit	9

The table below indicates to which government the applicant should submitting his application under the 2018 Mines Rules :

Types of permits	Application to		
	MONREC	Department of Mines	State and regions
Exploration	Mineral	Stone	Mineral
Large			
Medium	Metallic and industrial Minerals	Stone	
Small	Restricts Minerals		Mineral

Under 2018 Mines Rules, The Government Agency responsible for issuing permits depending on the type of permit and the commodity as indicated in the table below:

Types of permits	Awarding authority				
	MONREC after the approval of the Ministry’s Administrative Committee			Department of Mines	State and region
	Foreign investment	Local investment			
	Government	Government	Ministry		
Exploration	Mineral (large scale)	Metallic Mineral	Mineral (large, Medium, small scale)	Stone	Mineral
Large			Stone & industrial Minerals		
Medium			Metallic and industrial Minerals	Stone	
Small			Restrict Minerals		Mineral
Artisanal					

## Technical and financial criteria

Article 13 (a) of 1994 Myanmar Mines Rules stipulates that: « *the applicant shall have adequate financial resources, technical competence and experience, to carry on effective exploration operation* ».

Article 24 of 1994 Myanmar Mines Rules stipulates that: “ *the applicant has adequate financial resources and also technical competence and experience to carry out the mineral production operation effectively;*”.

Additionally to Sub section (K) of chapter 1 of the 2015 Amendment of Myanmar Mines Law : “*Large Scale extraction means the commercial production of the mineral as business activity with the permission to produce from 15 years to 50 years and which requires substantial investment and expenditure or special technical knowhow and methods according to the volume of the mineral deposit*”.

It is therefore manifest that the mining law and rules require the applicant to prove its technical and financial capacities.

## Awarding method

We understand according the 1994 Myanmar Mines Rules that the awarding method is based on first-come-first-served basis.

However, with the 2018 Myanmar Mines Rules, the awarding method is depending on if the proposed area has been applied for by one or more than one applicant for a Minerals Exploration Permit, showing or not commercially viable extractability after a regional geological survey and study of that area.

Article 24 of the 2018 Myanmar Mines Rules stipulates that: The relevant permit granting department/ organisation shall:

“ *Examine and select the first applicant and registered person or organization by giving them priority, if they meet the specifications prescribed in Rule 23, where the same proposed area has been applied for by one or more than one applicants for a Minerals Exploration Permit, and where a regional geological survey and study of that area has not been conducted*”.

“*If an area has been applied for with the Mineral Exploration Permit by one party or more than one party, and if the current Mineral Prospecting Permit holder is no longer desirous to continue but if it has complete geological data showing commercially viable extractability, in accordance with Rule 23 and specifications, the permit shall be selected based on a competitive basis*”.

It therefore appears that the award process is based on competitive basis if the complete geological data showing commercially viable extractability. Otherwise, the award of the area process is based on first-come-first-served basis.

## Pearl

According to the information reported by the MPE<sup>69</sup>, There are ten types of pearl operations :

- oyster fishing and collecting;
- artificial breeding of oysters;
- oyster rearing;
- oyster culturing;
- pearl harvesting;
- sales of oyster shell;

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<sup>69</sup> <https://www.mopf.gov.mm/sites/default/files/4th%20MEITI%20Report.pdf>

- oyster diving vessel operation;
- pearl culturing technician;
- oyster rearing technician ; and
- pearl culturing diving technician.

We understand also that there are two types of permits required based on the types of operations, license and registration. Ministry approves license for oyster fishing and collecting, artificial breeding of oysters, oyster rearing, oyster culturing, pearl harvesting and sales of oyster shells for foreign companies and artificial breeding of oysters, oyster rearing, oyster culturing and pearl harvesting for citizen companies while MPE approves licenses for oyster fishing and collecting and sales of oyster shells and registration of oyster diving vessel, pearl culturing technician, technician for artificial breeding of oyster, oyster rearing technician and pearl culturing diving technician.

**Table 75 : Types of Operations with License Requirement**

No.	Type of Operations	Type	Ministry Foreign	Citizen	MPE Foreign	Citizen
1	Oyster fishing and collecting	License	✓	-	-	✓
2	Artificial breeding of oysters	License	✓	✓	-	-
3	Oyster rearing	License	✓	✓	-	-
4	Oyster culturing	License	✓	✓	-	-
5	Pearl harvesting	License	✓	✓	-	-
6	Sales of oyster shell	License	✓	-	-	✓
7	Oyster diving vessel	Registration	-	-	✓	✓
8	Pearl culturing technician	Registration	-	-	✓	✓
9	Technician for artificial breeding of oyster	Registration	-	-	✓	✓
10	Oyster rearing technician	Registration	-	-	✓	✓
11	Pearl culturing diving technician	Registration	-	-	✓	✓

Different operations need to use different application forms

**Table 75 : Types of Operations with Application Forms**

No.	Type of Operations	Type	Application Form for Foreign	Application Form for Citizen
1	Oyster fishing and collecting	License	MaPaLa - 1	MaPaLa - 5
2	Artificial breeding of oysters	License	MaPaLa - 1	MaPaLa - 2
3	Oyster rearing	License	MaPaLa - 1	MaPaLa - 2
4	Oyster culturing	License	MaPaLa - 1	MaPaLa - 2
5	Pearl harvesting	License	MaPaLa - 1	MaPaLa - 2
6	Sales of oyster shell	License	MaPaLa - 1	MaPaLa - 6
7	Oyster diving vessel	Registration	MaPaLa - 9	MaPaLa - 9
8	Pearl culturing technician	Registration	MaPaLa -10	MaPaLa -10
9	Technician for artificial breeding of oyster	Registration	MaPaLa - 15	MaPaLa - 15
10	Oyster rearing technician	Registration	MaPaLa - 16	MaPaLa - 16
11	Pearl culturing diving technician	Registration	MaPaLa -11	MaPaLa -11

### 3.3.9. Register of mining licenses

Myanmar does not currently have a mining cadastre. We were provided with a list of active licenses, which is presented in Annex 6 of this report.

We understand that the process of implementing a mining cadastre is ongoing. This process began in 2016 with a diagnostic study. A consultant for the conceptual design was recruited in mid-2016. The objective of the pre-cadastre is to create a complete and clean database (graphic and alphanumeric, linked into a GIS) where all the existing mineral rights as well as the pending application should be properly included and codified.<sup>70</sup> The first phase of conceptual design of the Myanmar mining cadastre was carried out by the consultant, between October 2017 and February 2018. His report identified the main deficiencies in the licensing methodology, proposed the required solutions and developed a roadmap for implementation of a new licensing methodology and a modern cadastre in Myanmar is consistent with the best international practice.

On 21 December 2018 the Ministry of Planning and Finance (MoPF) launched a ToR for an international consultancy for the development and installation of a computerised mining cadastre system in Myanmar (Phase II)<sup>71</sup>. The principal objective of the assignment is the design, installation and testing of a new modern computerised Myanmar Mining Cadastre to automate the management of the application and granting of mining titles, guarantees the transparency, efficiency and performance of the process, as well as ensure the security of tenure and protection of mining titles. The new cadastral system would be based at the MONREC central office in Nay Pyi Taw, having also units in the states and regions where the decentralised licensing activities take place. It would improve governance and investment climate of the mining sector, provide easy access to minerals by private investors and improve transparency and public accountability. The Myanmar Mining Cadastre System would be required to:

- provide a robust and transparent system for the management of mineral and gemstones licenses consistent with the Myanmar Mining and Gemstone Laws;
- provide guidelines for appropriately formatted data, maps and reports for internal and external clients;
- provide various levels of security and access to the information, reflecting the various functional roles in license administration;
- provide reports and statistics for internal use and external dissemination;
- provide systems for dealing with issues of non-compliance and notices to companies for minor breaches; and
- provide a client-focused and user-friendly interface with the investing community.

This contract started from 2018 and the project should be completed by December 2020 when the cadastre is expected to be fully operational.

### 3.3.10. Mining licence transfer

The 1996 Myanmar Mining Rules provided that the holder of a licence had the right to transfer the licence with the approval of the Ministry or the Department. However, no guidance was provided on the basis upon which the transfer was to be approved or rejected. The new 2018 Mines Rules provide the clarity required, which is procedural in nature, with the focus on ensuring the transferee complies with the conditions of the licence.

According article n° 158 of Myanmar Mining Rules : “*The company or organization to which the permit is transferred shall pay the transfer fee to the account specified by the Department of Mines or State or Region Worksite Scrutiny and Allocation Board at the prescribed rates for each type of operation as stated in the procedures made under the Law when the permission for the transfer permit is granted under Rule*”.

According to the data reported by the DOM, we understand there was no licenses transfer during 2017-2018.

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<sup>70</sup>[https://myanmareiti.org/sites/myanmareiti.org/files/publication\\_docs/intermediate\\_report\\_tracking\\_changes1.pdf](https://myanmareiti.org/sites/myanmareiti.org/files/publication_docs/intermediate_report_tracking_changes1.pdf)

<sup>71</sup> [https://myanmareiti.org/sites/myanmareiti.org/files/publication\\_docs/cadastre\\_tor\\_final\\_211218.pdf](https://myanmareiti.org/sites/myanmareiti.org/files/publication_docs/cadastre_tor_final_211218.pdf)



#### **Technical and financial capacities of the transferee**

The new rules 2018 don't specify if the transferee should have the technical and financial capacities but according article 155 the respective permit granting department may issue the permit or refuse to issue the permit if there the transferee is not eligible under the Law and these Rules. We understand that the technical and financial capacities are among the eligibility criteria.

#### **3.3.11. Mining contracts**

The Ministry may authorise any Director General of the relevant departments or the Managing Director of Mining Enterprises under the Ministry to enter into agreements relating to mineral prospection, mineral exploration, a mineral feasibility study, large-scale, medium scale or small-scale mineral production with any person, company or organisation.

The relevant State or Region Worksite Scrutiny and Allocation Board may authorise any officer of the departments under its management to enter into agreements relating to small scale mineral production with any local individual or local organisation.

Any person or organisation may enter into joint venture agreements relating to mineral prospecting, mineral exploration, feasibility studies or mineral production with any state owned enterprises under the ministry, in accordance with these rules.

A person desirous of carrying out industrial minerals or stone prospecting, exploration or small-scale production with local citizen may enter into a joint venture agreement with any department under the management of the State or Region Worksite Scrutiny and Allocation Board, in accordance with these Rules.

The contracts may be signed through bidding or negotiation based on the specified terms and conditions. In practice, mining is usually conducted under production sharing contracts (PSCs), which are not mentioned in the Mining Rules 1996.

### 3.3.12. Policy on disclosure of contracts and licenses

#### Contracts disclosures

Contractual terms in the mining sector remain largely unknown. Companies inform us that under existing contractual terms (including the Non-disclosure terms), they are unable to disclose contracts without government consent, even where they are willing to do so.

We understand that the main type of model contract between mining operators and mining enterprises includes a confidentiality clause which prevents the parties from disclosing any information relating to the operations to third parties, except for information which is required to be disclosed by law to financial institutions for the purpose of funding. However, that clause does not expressly prohibit disclosure of the contracts themselves. Moreover, the mining legislation does not include any specific restrictions on the public disclosure of contracts and licenses by the government.

The Department of Geological Survey and Mineral Exploration has since made public and updated a sample agreement for prospection, exploration and feasibility study operations<sup>72</sup>. The agreement includes information on fiscal terms and operational commitments. It also outlines the companies' administrative and legal responsibilities and the formation of a joint coordination committee for oversight of mining operations.

#### Contract allocation and transfer disclosure

The Mining Legislation does not restrict the disclosure of the award or transfer of mining permits or the criteria used for the granting of a licence.

In practice, MONREC does not publicly release any information on the award or transfer of mining permits and there may be restrictions on disclosure of such information in mining contracts signed with operators.

### 3.3.13. State participation in the mining sector

#### Production sharing contracts

The Myanmar Ministry of Mines (MoM) utilises Production Sharing Contracts (PSCs). Under a PSC agreement the investor is required to come up with 100% of the investment. The government takes a share of the production according to a production sharing ratio agreed between the mining joint venture partners. The Production Sharing Ratio is based on the mineral commodity such as Gold, Copper, Lead, Zinc, Tin, Tungsten, Nickel, Manganese, industrial raw, mineral and coal and the current commodity prices on the London Metal Exchange.

The 1989 State-Owned Enterprises Law grants the Union Government the 'sole right' to carry out business in certain sectors. This includes all exploration, extraction and export of minerals, metals, pearl, jade and precious stones. Private operators and investors may, however, participate in the mining sector through contracts with the Government or by entering joint venture agreements with the relevant SOE. Such joint ventures operate on a production sharing basis, whereby the private partner is responsible for raising all capital for investment and production is shared with the relevant SOE in accordance with the terms and conditions set out in a negotiated Production Sharing Contract (PSC). While both production sharing split and other taxes and royalty payments vary depending on several factors, including the mineral and whether the operator is a foreign or Myanmar citizen investor, the ratio is typically in the range of a 70%/30% split to the private company and the mining SOE, respectively.

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<sup>72</sup> Department of Geological Survey and Mineral Exploration, "[Sample] Agreement for prospecting, exploration and feasibility study of \_\_\_ and associated minerals at \_\_\_ area, \_\_\_ township, \_\_\_ region" (web date 2012) and Department of Geological Survey and Mineral Exploration, "[Sample] Agreement for prospecting, exploration and feasibility study of \_\_\_ and associated minerals at \_\_\_ area, \_\_\_ township, \_\_\_ region" (web date 2016).

According to government officials, all mines today have been either privatised or are operating in a public-private joint venture, with no mining projects run solely by an SOE.

### **State Owned Enterprises (SOEs)**

The State-Owned Economic Enterprise Law grants the government discretion to allow investment either as joint venture between the government and the investor, or to allow the investor to pursue the enterprise independently under prescribed conditions.

Where the relevant Ministry considers that the application should be dealt with under the Foreign Investment Law, the company will be required to obtain a Foreign Investment permit. Criteria which suggest that Foreign Investment Law is applicable include: whether the Ministry believes the operation should be a joint venture with a State Owned Enterprise and the size of the proposed operation.

Joint venture companies which partner with the State or a State-Owned Enterprise must obtain a Foreign Investment Law permit along with a Companies Act permit. Foreign Investment Law permits are issued by the Myanmar Investment Commission (MIC). For joint-ventures, MIC has discretion to stipulate minimum equity participation requirements for each partner.

Although State-Owned Economic Enterprise Law remains in effect, the Foreign Investment Law largely determines in practical terms, how GOUM exercises its involvement in the extractive industries sector. In contrast to the State-Owned Economic Enterprises Law, GOUM no longer exercises its right to monopolise the extraction of resources.

### **Participation in the other minerals sector**

Following our review of the context of the mining sector, we understand that the State's intervention in the mining sector is made primary through the No. 1 Mining Enterprise (ME1) and No. 2 Mining Enterprise (ME2).

### **State-Owned No. 1 Mining Enterprise (ME1)**

No. 1 Mining Enterprise (ME1), a State-Owned Enterprise under MONREC, which oversees the production and marketing of non-ferrous metals such as lead, zinc, copper, silver, iron, aluminium, cadmium, cobalt, antimony, chromium, tellurium, mercury and arsenic, as well as by-products such as antimonial lead and copper matte.

### **Participation of ME1 in the mining Joint Ventures**

The enterprise is currently a partner in multiple joint ventures with both local and foreign mining companies operating in Sagaing Region, Township of Lashio, Shan State and Mandalay Region. The participation of ME1 in the mining Joint Ventures is presented in the Annex 6. We understood that there were no changes in the percentages detained in the JVs between 2016-2017 and 2017-2018.

### **Responsibility to cover expenses at various phases of the project cycle**

According to Mines Law and regulations investors are expected to provide 100% of the exploration expenses until completion of the feasibility study. After a positive feasibility study, the joint venture is structured for the investor, with interest for the State Mining Enterprise (ME1), and interest for the government.

### **Participation of ME1 in the equity of mining companies**

We understood that ME1 did not hold any participation in the equity of mining companies in 2017/2018.

### **Revenues**

ME1's revenues are comprised of:

- revenues from the sale of the state's share of production (production split);
- production split (cash payment); and
- application fees.

Based on the data reported by ME1, the total revenues collected during 2017/2018 amounted MMK 21,982,876,571. The table below indicates the total revenues disaggregated by revenue stream:

*Figures in MMK*

Revenue stream	2017/2018
Production split	16,831,786,328
in-Kind payment sales revenues	3,844,711,775
Other received amount	1,306,378,468
<b>Total</b>	<b>21,982,876,571</b>

The Revenues collected from the sale of the state's share of production during 2017/2018 amounted MMK 3,844,711,775. ME1 did not report details of the sale revenues disaggregated by commodity, by transaction, by destination and individual buying company.

### Financial relationship between mining ME1 and the government

Myanmar's profit-making ME1s are permitted to retain 55% of their profits with 20% being transferred to Public Treasury as State contribution, while 25% is paid as corporate income tax.

### Transfers performed by ME1 to government during 2017/2018

The table below indicates the total amount transferred by ME1 to government during 2017/2018 detailed by payment flow:

*Figures in MMK*

Revenue stream	2017/2018
Transfers to Treasury department (State contribution 20%)	6,030,447,000
Corporate Income Tax	7,538,061,100
<b>Total</b>	<b>13,568,508,100</b>

### Loans or subsidies received from government

based on the data reported by the Treasury Department, we identified the following loan related to the ME1 company:

**Table 76 : Details of the ME1 loan**

Beneficiary	Sector	Currency	Total amount of the loan	Date of grant	Terms of the Transaction	Repayment period	Interest rate	Outstanding amount on 31/03/2018
<b>I. No (1) Mining Enterprise</b>								
<b>(1) Japan Loan</b>								
(i) Steel Mill Renovation (MY-C1, JICA)	Mining	JPY	4,637	28-12-1982	30 years	1.01%		3,050
<b>Total</b>		<b>JPY</b>	<b>4,637</b>					<b>3,050</b>

### Other account (OA) of ME1

Based on the data received from ME1 related to OA, we note that the closing balance amounted to MMK 65,554,803,629 as detailed below:

**Table 77 : Details of the ME1 OA**

*Figures in MMK*

2017/2018	Amount
Opening Balance	62,860,037,560
Add: Total Received Amount	21,982,876,571
Less: Total Expenditure Amount	19,288,110,502
<b>Closing balance as of 31 March 2018</b>	<b>65,554,803,629</b>

## Audit of Annual Statements of No.1 Mining Enterprise

ME1 undergoes an audit by the Office of the Auditor General annually. The primary purpose of the audit is to determine whether the correct percentage of ME1 reported income is paid to the State in terms of income tax and state contribution. The OAG is also responsible for appointing a third-party auditor to review the finances of ME1's joint venture partners. We did not receive a copy of the audit report of the Financial Statements of the JV for the year ending 31 March 2018. We are informed that the report cannot be disclosed to the public.

## Social payments and quasi-fiscal expenditures

Based on the data reported by ME1, the company did not make any social payments or quasi-fiscal expenditure during FY 2017-2018.

## State-Owned No. 2 Mining Enterprise (ME2)

ME (2) is responsible for mining tin concentrate, tungsten concentrate, tin - tungsten mixed concentrate and gold. Several production sharing agreements are entered into with local and foreign companies.

## Participation of ME2 in the mining Joint Ventures

The enterprise is currently a partner in multiple joint ventures with both local and foreign mining companies in Kachin State, Kayah State, Shan State, Mon State, Sagaing Region, Mandalay Region and Tanintharyi Region. The participation of ME2 in the mining Joint Ventures is presented in Annex 6 of the report. We are informed that there were no changes in the percentages detained in the JVs between 2016-2017 and 2017-2018.

## Responsibility to cover expenses at various phases of the project cycle

According to the Mines Law and regulations investors are expected to provide 100% of the exploration expenses until completion of the feasibility study. After a positive feasibility study, the joint venture is structured for the investor, with interest for the State Mining Enterprise (ME2), and interest for the government.

## Participation of ME2 in the mining companies

We are informed that ME2 did not hold any participation in the equity of mining companies in 2017/2018.

## Revenues

ME2's revenues received from mining companies comprised:

- revenues from the sale of the state's share of production (production split-in kind);
- production split (cash payment); and
- application fees.

Based on data reported by ME2, the total revenues collected from mining companies during 2017/2018 amounted MMK 18,871,240,255. The table below indicates the total revenues disaggregated by revenue stream:

Table 78: Details of the ME2 revenue

Figures in MMK	
Revenue stream	2017/2018
in-Kind payment sales revenue	15,271,025,812
Production split (*)	3,275,074,021
Application fees (*)	125,000,000
Other Fees (Penalty/Rental machineries) (*)	200,140,422
Total	18,871,240,255

(\*) only revenues received from mining companies selected in the reconciliation scope 2017/2018

The Revenues collected from the sale of the State's share of production during 2017/2018 amounted MMK 15,271,025,812. The table below sets out details of the sale revenues by commodity.

*Figures in MMK*

Type of Minerals	Sale Volume	Unit	Sale Value
Gold	7,192	Tical	6,582,090,339
Tin, Tungsten & Mixed Ore	720	MT	8,649,373,513
Pyro Refined Tin	1	MT	39,561,960
<b>Total</b>			<b>15,271,025,812</b>

### Financial relationship between mining ME2 and the government

Myanmar's profit-making ME2s are permitted to retain 55% of their profits, while 20% is transferred to Public Treasury as State contribution and the remaining Being paid 25% as corporate income tax.

#### Transfers made by ME2 to government during 2017/2018

The table below shows the total amount transferred by ME2 to government during 2017/2018 detailed by payment flow:

**Table 78 : Details of the ME2 revenue**

*Figures in MMK*

Revenue stream	2017/2018
Transfers to Treasury department (State contribution 20%)	4,222,813,000
Corporate Income Tax	1,544,892,000
Commercial Tax	65,161,535
Capital Gains Tax	3,015,990
<b>Total</b>	<b>5,835,882,525</b>

#### Loans or subsidy received from government

According to the information reported by ME2, the company did not receive any loans or subsidy from government during FY 2017/2018

#### Other account (OA) of ME2

The available amount in the OA at 31 March 2018 amounted to MMK 112,010,740,361. This was confirmed by the ME2's Financial Statements ended 31 March 2018. The table below indicates the total amount received and the total expenditure amount and OA's closing balance at 31 March 2018.

*Figures in MMK*

2017/2018	Amount
Opening Balance	103,777,420,747
Add: Total Received Amount	21,656,626,867
Less: Total Expenditure Amount	13,423,307,253
Closing balance as of 31 March 2018	112,010,740,361

#### Audit of Annual Financial Statements of No.2 Mining Enterprise

ME2 is audited by the Office of the Auditor General on an annual basis. The primary purpose of the audit appears to be to determine whether the correct percentage of ME2 reported income is paid to the State in terms of income tax and state contribution. OAG is also responsible for appointing a third-party auditor to review the financial statements of ME2's joint venture partners. We have received a copy of the audit report of ME2's Financial Statements ending 31 March 2018. We understood that the audit report is not publicly disclosed.

## Social payments and quasi-fiscal expenditures

According to the information reported by ME2, the company did not make any social payments or quasi-fiscal expenditure during FY 2017-2018.

### Participation in the Gems and Jade sector:

Following our review of the contextual data of the Gems and Jade sector, we understand that the State's intervention in this sector is made primary through the Myanmar Gems Enterprise (MGE).

MGE supervises and grants permits to local private entrepreneurs, who wish to make joint venture production with the nation on mutual benefit allowing to produce in the tracts. Myanmar Gems Enterprise also organises the emporiums and special sales three times a year for the productive jades and gems sale. Moreover, Myanmar Gems Enterprise encourages Gems and jewellery Traders to allow permit, so that the jewellery shops are being developed and the market takes place in Yangon.<sup>73</sup>

MGE's authority is not clearly defined in the existing legislations or regulations. Instead, MONREC has delegated its authority under the Myanmar Gemstone Law (1995) to MGE via ministry rules and regulations. MGE's self-stated duties are identified on its website as: (a) the designation of gemstone blocks in gemstone tract areas; (b) the granting of gemstone production permits to national entrepreneurs and cooperative societies; (c) the charge taxes on gemstone production and the sale of raw or finished gemstones and jewellery; and (d) the holding of gems emporiums under the supervision of MONREC. In practice, however, MGE has assumed wider-ranging commercial and regulatory responsibilities:

- Commercial activities: MGE participates in jade and gemstone joint ventures on behalf of the State, which are based on a model contract. While the size of licenses granted to private operators are capped at 1 acre, companies entering into joint venture agreements may mine up to 50 acres under a single permit at a minimum price of MMK 1 million per acre. The criteria by which MGE's joint venture partners are determined are not specified in laws or relevant internal directives. MGE's interest in mining joint ventures is freely carried out and MGE is not obligated to bear any operational costs. Joint ventures are required to market their production at semi-annual jade and gemstone emporiums, with MGE and private partners receiving 25% and 75% of revenues from these sales respectively. Under its model contract, MGE may alternatively receive a 50% share of production from joint ventures. However, the government does not appear to have pursued this option in recent years.
- Regulatory activities:
  - Policymaking: MGE has been responsible for drafting regulations and directives under the Myanmar Gemstone Law. MGE participates in the Central Gemstone Supervisory Committee, which is responsible for advising MONREC on regulatory matters (including the designation of gemstone tracts, licensing, taxation and gemstones sales) and arbitrating disputes over gemstone valuation. The supervisory committee is chaired by the Deputy Minister of MONREC (formerly Deputy Minister of Mines) and also includes representatives from other relevant Government Agencies, gemstone experts and technicians, and members of the Myanmar Gems and Jewellery Entrepreneurs' Association and the country's national-level industry group.
  - Licensing: Under the former government, MGE was responsible for the review of license applications, collection of associated revenues, and maintenance of permit records. MGE also participated in the Working Committee for issuing permits, inspecting and supervising gemstone blocks, which made recommendations to the leading committee on license allocation and the designation of gemstone tracts.

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<sup>73</sup> <http://www.mining.gov.mm/MGE/1.MGE/Details.asp?submenuID=17&sid=48>



- ✚ Monitoring: Although the legal basis for its role is not clear, MGE has exercised de facto authority over enforcement of monitoring jade and gemstone mining companies' compliance with fiscal and operational terms included in licenses and contracts, including environmental, social, health and safety standards.
- ✚ Revenue collection: Companies are required to report their gemstone production to the local MGE office. Royalty payments are determined by eleven regional "valuation bodies" which comprises:
  - three officers from MGE (one of whom serves as the chair of the valuation body);
  - a representative from the region/state government;
  - a member of the region/state parliament;
  - a township revenue officer;
  - a representative from Myanmar Gems and Jewellery Entrepreneurs Association (MGJEA); and
  - two business owners with expertise in jade/gems.

### Shareholding of MGE in Gems and Jade Joint Ventures

- In 2017-2018, MGE held 25% in all the Gems and Jade JVs. The list of active licenses is presented in the Annex 5 of the report.
- From the data received from MGE, it appears that the company does not hold any shares in other private companies.

### Financial relationship between mining SOEs and the State

The data received from MGE shows the detail of revenues collected and transferred by MGE and the balance of its respective Other Accounts in the table below.

**Table 79 : Details of the MGE other accounts**

Amounts in MMK

Bank Account Name	Incentive Accounts	Museum Entrance Fee	Myanmar Gems Enterprise	Myanmar Gems Enterprise	Emporium Central Committee	Total
Bank Account No.	OA-011782	OA-011771	OA-010659(SEE)	SEE-10532	OA- 012570	
Opening Balance (1.4.2017)	3,280,412,510	499,815,803	683,705,850,049	-	610,823,289	688,096,901,652
Inflows	5,123,630,452	3,522,500	174,658,756,547	902,174,704	2,685,779,422	183,373,863,624
Outflows	3,710,393,756	1,896,450	103,777,226,977	216,300,000	1,139,489,312	108,845,306,495
Closing Balance (31.3.2018)	4,693,649,206	501,441,853	754,587,379,619	685,874,704	2,157,113,399	762,625,458,781

According to 2017-2018 MGE audit report, the statements of total revenues and expenditure for the year were as follows:

**Table 80 : MGE statements of total revenues and expenditure**

Amounts in MMK

Description	Revised Budget		Suspense Account Actual
Expenses			
Cost of goods sold	1,844.400	(-)	16,785.213
Administration Expenses	2,603.484		2,595.805
	<b>4,447.884</b>	<b>(-)</b>	<b>14,189.408</b>
Less: Security Expenses	-		-
Distribution Expenses	30.350		14.839
Financial Expenses	1.000		20.400
Special Goods Tax	350.000		-
<b>Total Operation Expenses</b>	<b>4,829.234</b>	<b>(-)</b>	<b>14,154.169</b>



Description	Revised Budget	Suspense Account Actual
Income		
Sales	837.434	1,286.146
Income related to Gems Law	40,110.835	40,394.343
Income from Services	46,557.452	41,455.087
<b>Other income</b>	<b>140,034.617</b>	<b>132,984.107</b>
<b>Total Income</b>	<b>227,540.338</b>	<b>216,119.683</b>

### Military Holding Companies

The two large military holding companies, Myanmar Economics Holding Public Company Limited (UMEHL) and Myanmar Economic Corporation (MEC) hold important positions in Myanmar's economy, including in the energy, mining and gems sectors. These two companies which report to directorates of the Defence Services are set up under laws that provide protections and privileges to state-based companies.

The purpose of setting up both companies was to generate funds for the welfare of both active-duty and retired Defence Services personnel and their families. This has been accomplished through a combination of profit distribution and job provision for family members of military personnel as well as for veterans themselves.

### Myanmar Economics Holding Public Company Limited (MEHPCL)

#### Presentation

MEHPCL was set up in 1990 under the Special Companies Act as the economic arm of the Burmese military, during a period of privatisation and transition from a socialist command economy, with an initial capital of USD 1.6 billion. UMEHL was set up to generate profits from light industry and the trade of commercial goods.

In the mid-2000s it expanded into services and trading activities. Its current holdings include stakes in almost all sectors of the Myanmar economy.

MEHPCL is jointly owned by two military departments: the Directorate of Defence Procurement and Defence Personnel (active and veterans), including high-ranking military officials. IRD collects the revenues in accordance with the existing laws, rules and regulations. MEHPCL has been paying commercial taxes from the year 2017-2018.

MEHPCL participate in various projects in Myanmar as shown in the table below:

**Table 81 : MEHPCL main projects**

Region/State	Area	Type
Mandalay	Kyaukpukhet	Limestone
Mandalay	Hsin Mountain	Granite
Mon	Mayangon	Granite
Mon	Kyauk Mae Mountain	Granite
Mon	Tir War Mountain	Granite
Sagaing	Kyay Sin Mountain	Copper
Sagaing	Kyauk An Che	Coal
Sagaing	Letpadaung Mountain	Copper

MEHPCL subsidiaries include Myanmar Imperial Jade Company and Myanmar Ruby Enterprise, which operate mines at Mogoke, Mongshu, Nayar, Mawchi and Thabeikkyin. Some of these operations are subcontracted to other domestic companies.

The subsidiaries of Myanmar Ruby Enterprise Limited are as follow:

- Kayah State Mining Co., Ltd.
- DuWun Star Gems and Jade Co., Ltd.
- Thein Nget Star Gems and Jade Co., Ltd.
- Sait Taya Star Gems and Jade Co., Ltd.
- Dana Thedi Star Gems and Jade Co., Ltd.
- Thit Sar Pan Gems and Jade Co., Ltd.
- Pone Nyat Gems and Jade Co., Ltd.
- Sabal Gems and Jade Co., Ltd.
- Myanmar Imperial Jade Gems and Jade Co., Ltd.

These companies have been included in the reconciliation scope for 2017-2018.

The information reported by MEHPCL indicates that it holds shares in the following companies:

#### **Trading Business**

- Myawaddy Trading Limited
- Shwe Gradamar International Trading Limited
- Adipati Agricultural Produce Trading Limited
- Ngwe Pinlae Livestock Breeding and Fisheries Co.,Ltd
- Myanmar Ruby Enterprise Limited

Myanmar Ruby Enterprise (MRE) is in the gems and jade production.

Myanmar Imperial Jade Gems and Jade company limited is solely operate the exploration and production of gems and jade. The sharing ratio is the same as with Myanmar Ruby Enterprise.

The company is also involved in other sectors such as services, production, local and foreign joint venture businesses.

#### **Financial relationship between MEHPCL and the government**

MEHPCL pays taxes to the government on its extractive activities, both in-kind and cash. The cash payments made by MEHPCL on mining activities and reported by Government Agencies after reconciliation amounted MMK 29,133,864,790.

The cash payments made by MEHPCL subsidiaries on Gems and Jade activities and reported by Government Agencies after reconciliation are set out in the table below:

**Table 82: Payments performed by the MEHPCL subsidiaries**

		Amount MMK
No.	Company	Government Disclosure
1	Myanmar Ruby Enterprise (Jewellery) Co., Ltd.	431,713,780
2	Thein Nhget Star	330,055,801
3	Duwon Star (Gem&Jewellery)Co.,Ltd	2,401,246
4	Dana Thedi Star (Gem&Jewellery) Co.,Ltd	3,501,503
5	Si Tra Star	2,083,860
6	Pone Nyet (Gem & Jewellery) Co.,Ltd	62,551,391
7	Thit Sar Pann (Gems & Jewellery) Co.,Ltd	1,550,000
8	Jasmine (Sabae(Gem & Jewellery) Co.,Ltd)	12,977,549
<b>Total</b>		<b>846,835,130</b>

The in-kind payments made by MEHPCL to government during 2017-2018 are set out in the table below:

Commodity	Unit	Volume
Gold	Tical	728
Copper	MT	12,551

According to our discussion with the management company, the company is not distributing dividends to its shareholders.

### Social payments and quasi-fiscal expenditure

MEHPCL has reported paying kyat 703,611,120 of social payments. The company did not provide us the details of those payments and the name and function of the beneficiary. The table below indicates the amount of mandatory social payments and voluntary social payments, as follows:

**Table 83 : Social payments performed by the MEHPCL**

*Figures in MMK*

Social payments	Amount
Mandatory Corporate Social Responsibility	676,261,120
Voluntary Corporate Social Responsibility	27,350,000
<b>Total</b>	<b>703,611,120</b>

### The Myanmar Economic Corporation (MEC)

The Myanmar Economic Corporation (MEC) was set up in 1997, during the Asian financial crisis. MEC is one of the two major conglomerates and holding companies operated by the Burmese military forces. It was founded in 1997 to set up profitable heavy industries that can provide the Burmese military access to supplies of important materials (e.g. cement and rubber).

MEC operates under the Ministry of Defence's Directorate of Defence Procurement (DPP), with its private shares exclusively owned by active-duty military personnel. MEC's capital was issued through revenues generated from the public auctioning of State-Owned Enterprises throughout the 1990s. Through joint ventures with foreign companies and mergers with smaller companies, MEC has positioned itself as one of Burma's largest corporations.

Unlike UMEHL, MEC was more explicitly focused on serving the industrial and technological needs of the armed forces, as well as on larger-scale infrastructure projects. Although less is publicly known about MEC than UMEHL, OAG has the power to request audits from MEC but not from UMEHL.

MEC is also involved in extractive activities, namely in the extraction of gypsum, marble, limestone, coal, gems and Jade. MEC's mining interests are presented in the table below.

**Table 84 : MEC mining interests**

Region/State	Area	Type
Kayin	Than Dai Mountain	Limestone
Mandalay	Yathayt Mountain	Marble
Shan (East)	Mongku	Coal
Tanintharyi	Maw Taung	Coal
Shan (East)	Maw Taung	Gypsum

Based on the information received from MONREC, the following subsidiaries and representative presented in table below operate Myanmar Economic Corporation (MEC) and its subsidiaries which are in joint venture operation with No.2 Mining Enterprise.

**Table 85 : MEC list of subsidiaries**

Sr.	Company Name	Remarks
1	Myanmar Ruby Enterprise (Jewellery) Co., Ltd.	Subsidiary
2	Khaya State Metal Production Co., Ltd.	Subsidiary
3	Ye Htut Kyaw Mining Co., Ltd.	Representative of Khaya State Metal Production Co., Ltd.

2017-2018 report.

MEC is also involved in manufacturing activities. The company has 36 factories across the country near the extractive areas. It produces raw materials, which it transfers to other factories such as These companies have been included in the reconciliation scope for the cement factory in order to produce final products. MEC has two cement factories:

- N1 produces cement for building constructions for the Ministry of Defence; and
- N2 cement factory also sells to the public at standard prices.

### Financial relationship between MEC and the government

MEC pays taxes to the government on its extractive activities. The cash payments made by MEC on mining activities and reported by Government Agencies after reconciliation amounted to MMK 10,398,923,559. MEC officials inform us that the company did not distribute dividends to the government or to any other shareholders.

The cash payments made by MEC on its Gems and Jade activities and reported by Government Agencies after reconciliation amounted to MMK 48,695,337. We are informed that the company did not distribute dividends to its shareholders.

According to our discussion with the management company, the company is not distributing dividends to its shareholders.

### Social payments and quasi-fiscal expenditure

MEC did not report any social payments or quasi-fiscal expenditure.

## 3.3.14. Pricing method of the other mineral products :

According to DOM letter of the 10 March 2020 “the production system according to the Myanmar law of mining Section 25, Agreement contract section 163(a) Production agreement contract in respect of material kind.

Product	=	Royalties	+	the remaining coal
Eg.(Coal)	=	2%	+	98%
100 Ton	=	2 Ton	+	98 Ton

As to the facts that when mining material that are produced and sold with 2% taxes by the person who get permission of production mining material according to Chapter 6, mining and material tax, paragraph 18, must pay taxes on the value of mining material set by the department of ministry, after the company paid 2% taxes on the value of coal as per contract, the company and no.1 mining operation allocate as per following.

The remaining coal	=	ME 1	+	Contractor
(Coal)	=	30%	+	70%
98 Ton	=	29.4 Ton	+	68.6 Ton

In order to collect tax on the mining material, Department of Mines calculated and collected according to the mining material tax mentioned in the mining law Chapter 6 mining material tax Section 19, that is “ Department of mining must calculate the value of metal according to the international market price of the current period when it sell”.

The following agreements are included in the Section 21 of mutual agreement contract of allocation on the production of mining material with the agreement of Office of the Antony general.

(a) Section 21-1(a) “To make the committee included with ME1 and representative of Contractor. The Chairman must be the Director General of ME1 and must include 5 members.”

(b) Section 21-1(D) “The committee must negotiate and discuss about procedure of excavation and production of coal according to contract, technological issues, Management issues and Selling Issues”

(c) Section 21-1(E) “Committee’s decision and negotiation must be presented to department of ministry and management committee.

Therefore, in the case of collecting taxes on Mining material, as the value of coal has been not calculated by international price, the price must be set according the section 5 of service agreement of section (21) management that is “ the director general must set the amount to produce and selling price according to the market price after getting permission from department of ministry and committee of management.

According to the fact “taxes on metal and other charges can be collected with cash” mentioned in Section 35, paragraph 202 (E ) of Mining material law, it is collected based on in kind of mining material and tax has been levied on No.1 Zinc, Nickel and No.2 Gold, Tin and tungsten according to production agreement law.”

## 3.4. Reforms in the extractive sector

### 3.4.1. The abolition of other accounts

The other accounts are banks accounts used by the SOE to receive a proportion of their profit and used to cover raw materials, such as fuel for trucks, as well as capital expenses, debt expenses and other expenses<sup>74</sup>.

In June 2019, Myanmar's cabinet issued a directive to abolish the Other Accounts and as a result, state-owned enterprises (SOEs) will have to transfer all of their net income to the Union government, and not their own accounts.

### 3.4.2. The Myanmar mining rules

Following the Notification No. 13/2018, the Ministry of Natural Resources and Environmental Conservation (MONREC) enacted the new Myanmar Mines Rules.

The key changes brought by the Mines Law Amendments include<sup>75</sup>:

- increasing the maximum production permit period, for large scale production projects to 50 years;
- allowing joint ventures, between foreign investors and local investors, in the case of small and medium scale production projects upgraded to become large scale production projects;
- specifying the criteria for determining size of individual production permit areas; and
- providing a guaranteed right to production permit for those who have successfully carried out prospecting and exploration and completed a feasibility study.

The clarifications provided by the new Mines Rules include further guidance and addressing certain regulatory concerns for the creation of the necessary legal and regulatory environment conducive to investment in the mining industry including:

- **Procedures for application of relevant permits:** the Mines Rules set out certain procedural requirements for the application for various mining or mining-related permits. The Mines Rules provide that production permit holders will be able to conduct mineral treatment and mineral trading, without requiring specific permits.
- **Permitted area and tenure:** the Mines Rules contain details for investors in relation to permitted area and tenure. It provides that the "permitted area" for "large scale mineral operations plot" (i.e. area to be used for prospecting, exploration, feasibility study, and/or (large scale) production) shall be from 1 to 2100 square kilometres, and for "medium scale mineral operations plot" (i.e. area to be used for prospecting, exploration, feasibility study, and/or (medium scale) production), it shall be 1 square kilometre. The Mines Rules also sets out details related to the tenure of various mining permits. The Mines Law Amendments states that the maximum production permit period for a large-scale production project is from 15 to 50 years.
- **Focus on environmental considerations:** investors should be aware that environmental considerations are priority at the various levels of mining-related operations. Depending on the type of permit applied for, an investor may be required to submit various instruments for managing environmental impacts, such as Initial Environmental Examination, Environmental Impact Assessment (EIA) and/or Environmental Management Plan ("EMP"). Such instruments are to be prepared according to the requirements and guidance of the MONREC and in compliance with various legislations. The Mines Rules also state that permit holders shall be

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<sup>74</sup> [https://resourcegovernance.org/sites/default/files/documents/state-owned-economic-enterprise-reform-in-myanmar\\_0.pdf](https://resourcegovernance.org/sites/default/files/documents/state-owned-economic-enterprise-reform-in-myanmar_0.pdf)

<sup>75</sup> <https://www.shlegal.com/news-insights/myanmar-mines-law-amendments>

responsible for all expenses relating to environmental conservation. In this regard, the Mines Rules envisage permit holders to set-up an environmental conservation fund at a Myanmar state-owned bank.

### **3.4.3. The 2017 Myanmar company law<sup>76</sup>**

The Myanmar Companies Law came into effect on 1 August 2018. The main changes incorporated in this law can be summarised as follows:

- ❖ foreigners can now hold 35% in the Myanmar companies;
- ❖ companies can register online as long as they explain their overall structure and intended activities; and
- ❖ companies can be formed with only one director and one shareholder.

### **3.4.4. Petroleum and petroleum products law 20-2017**

The Union Parliament of Myanmar enacted the Petroleum and Petroleum Product Law of 2017 on 1<sup>st</sup> August 2017<sup>77</sup>. The objective of this law are as follows:

- ❖ to carry out the petroleum and petroleum product businesses activities systematically in accordance with the provisions of the law, stipulated standards, procedures and conditions;
- ❖ to enable the petroleum and petroleum product business activities to carry out safely without environmental impact;
- ❖ to establish free and fair competition in carrying out petroleum and petroleum product business activities;
- ❖ to secure energy requirement and energy security of the Union; and
- ❖ to obtain tax revenues for the State.

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<sup>76</sup> [https://www.dica.gov.mm/sites/dica.gov.mm/files/document-files/final\\_mcl\\_english\\_version\\_6\\_dec\\_president\\_signed\\_version\\_cl.pdf](https://www.dica.gov.mm/sites/dica.gov.mm/files/document-files/final_mcl_english_version_6_dec_president_signed_version_cl.pdf)

<sup>77</sup>

[https://www.myanmartradeportal.gov.mm/uploads/legals/2018/7/Petrol%20and%20Petroleum%20Product%20Law%202017%20\(Eng\).pdf](https://www.myanmartradeportal.gov.mm/uploads/legals/2018/7/Petrol%20and%20Petroleum%20Product%20Law%202017%20(Eng).pdf)

### 3.4.5. Union taxation law and fiscal amendments

Following the review of the Union Taxation Law 2017 and the Union Taxation Law 2018, we note the following tax amendments related to the extractive sector:

- ❖ **Amendments to the Union Taxation Law 2017**Raw/finished jade, rubies, sapphires jewellery sold at Myanmar domestic jewellery exhibitions held by the government are now exempted from commercial tax.
- ❖ The specific goods tax rates for importation and production of specific goods within the country have been changed as follows:
  - decrease in specific goods tax rate on raw jade from 20% to 15%.
  - decrease in specific goods tax rate on raw rubies, sapphires, emeralds, diamonds and other precious gems from 20% to 10%.
  - decrease in specific goods tax on the export of raw jade from 20% to 15%.
  - decrease in specific goods tax on the export of raw rubies, sapphires, diamonds, emeralds and other precious gems from 20% to 10%.

#### Amendments to the Union Taxation Law 2018

- ❖ Under the Union Taxation Law 2018, pure gold (Standard gold bars, gold block, gold coins) became exempt from commercial tax; and
- ❖ diamonds and emeralds are no longer on the list of businesses for extraction gems and producing and trading completed gems and jewellery in accordance with Section 34, Chapter 8 of the Union Taxation Law 2018, which specifies that sales of gems or jewellery, either in local or foreign currency are subject to:
  - specific Goods Tax at the rate of 5 to 10%; and
  - Commercial tax at 5% for import, production, selling and trading regardless of the threshold of non-taxable revenue.

### 3.4.6. Notification no. 104/2019<sup>78</sup> law : the beneficial ownership (BO)

This notification was issued on the 2 October 2019 and confirmed the mandate of the Beneficial Ownership Task Force to make decisions regarding ownership disclosures and empowers the Directorate of Investment and Company Administration (DICA) to implement them. The notification also paves way for several companies and state-owned enterprises operating in Myanmar's oil and gas production and transportation, mineral, pearl, jade and coloured gemstone industries to disclose their beneficial owners by 1 January 2020.

We understand that NRGI, DICA and the task force members were involved in the preparation of Myanmar's Beneficial Ownership register published in the DICA website<sup>79</sup>.

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<sup>78</sup> [https://myanmareiti.org/sites/myanmareiti.org/files/publication\\_docs/notification\\_bo.pdf](https://myanmareiti.org/sites/myanmareiti.org/files/publication_docs/notification_bo.pdf)

<sup>79</sup> <https://www.dica.gov.mm/>



### 3.5. Budget process

In Myanmar, accounting is on a cash basis, following the double entry principle. Most payments are made through the Myanmar Economic Bank (MEB) by cheques or bank transfers. Tax revenue is usually paid into MEB by the taxpayer directly, based on an assessment raised by the tax authorities, although some fees and charges are collected in cash and paid in by the relevant Government Agency.

Accounting records are originated by the spending/revenue raising Government Agency. Aggregation and reconciliation for reporting and control purposes are conditioned by the largely manual, paper-based processes that are still used in both the originating agencies and in MEB.

The accounting year for the Government runs from April to March. Accounts are prepared in the form of consolidated financial statements, including several annexes. Copies of the financial statements are provided to the Minister of Planning and Finance, the Cabinet, and the President, but are not published or made available to the public.

Since 1<sup>st</sup> October 2018, the accounting year for the government runs from October to September.

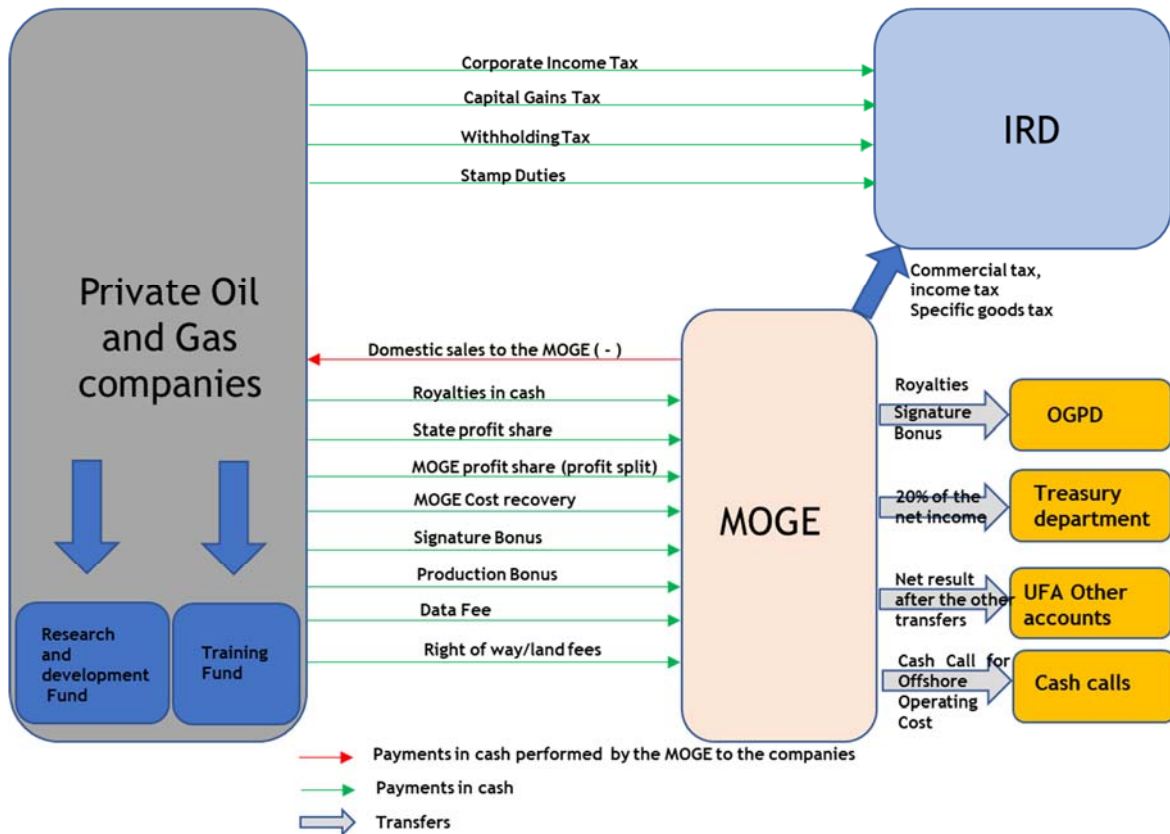
Since 2011, the Parliament has set up two specialised committees for the purpose of providing oversight of the Government's public finances. The Public Accounts Committee (PAC) has a bipartisan membership and vets the budget bill and the audit report. The Planning and Finance Committee is responsible for reviewing the national development plan and legislative matters related to the financial sector. Since 2012/13 these committees have reviewed and rationalised the executive budget proposal significantly and have been instrumental in having the approved Budget Law published in the local press.

In order to coordinate and integrate state and regional budgets with the Union's budget, the government has also set up the Financial Commission and the National Planning Commission. Since 2011, the new planning and budgeting practices have resulted in the decentralisation of Public Financial Management (PFM) policy functions from the President's Office to the Ministry of Planning, Finance (MoPF) and the Ministry of National Planning and Economic Development (MNPED) respectively.

### 3.6. Revenues collection and other accounts allocation

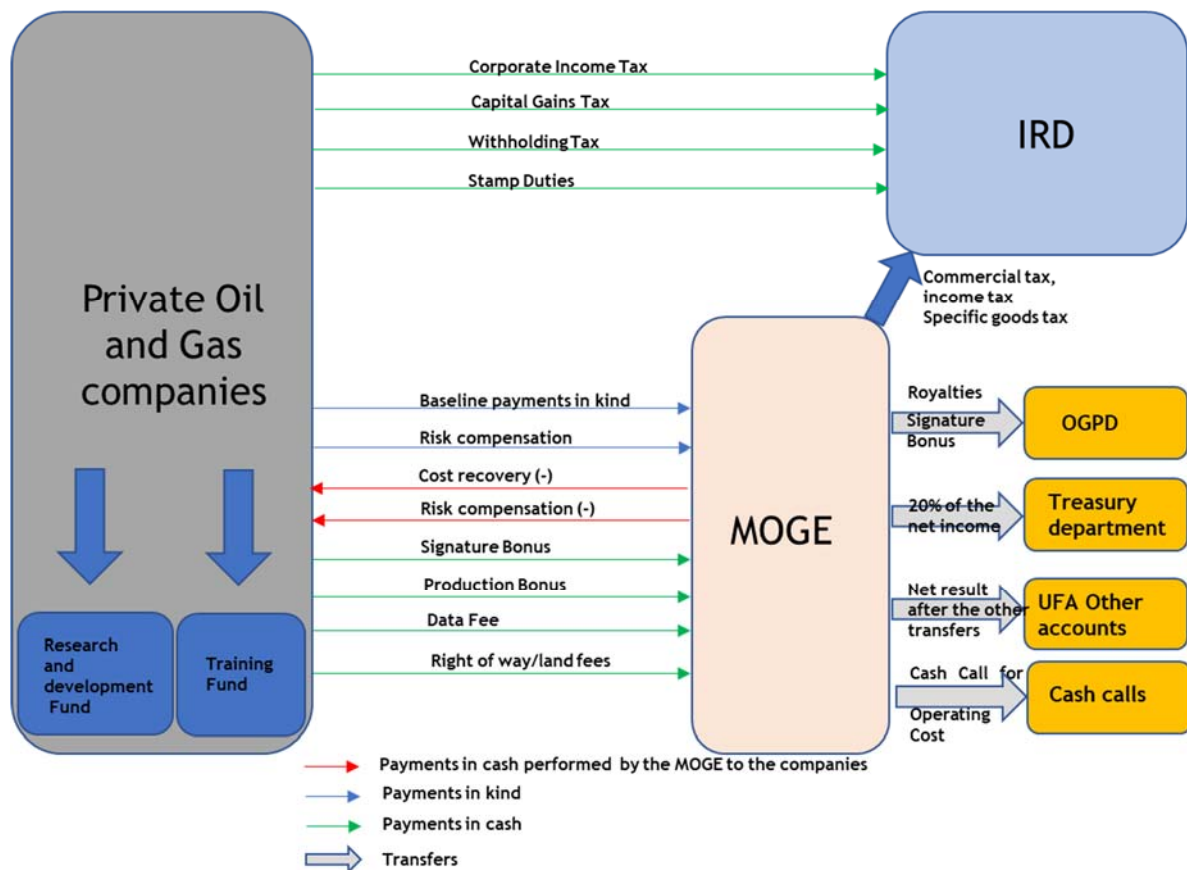
#### 3.6.1. Oil and gas payments flow

##### PSC contracts



- According to this type contract, the operator performs the Oil and Gas sales then allocate to the different partners their share according to the interest percentage included in the agreement;
- Every month the operator performs the cash call in order to cover its production expenses, then this amount is repaid as cost recovery (after deduction of the royalties in cash). Those expenses depend on the production, but the cost recovery is always 60% of the sales revenue.
- The royalties are paid in cash on a quarterly basis or monthly basis;
- The difference between the state profit share and the MOGE profit share is explained as follow :
  - The state profit share is calculated based on the production sales after the deduction of the cost recovery;
  - The MOGE profit share : after the deduction of the cost recovery and the state profit share, the remaining amount is divided between the different contractors according to their interest. The amount received by the MOGE is the MOGE profit share.
- 10% of the total sales is performed to MOGE on a discounted price.

## PCC contracts



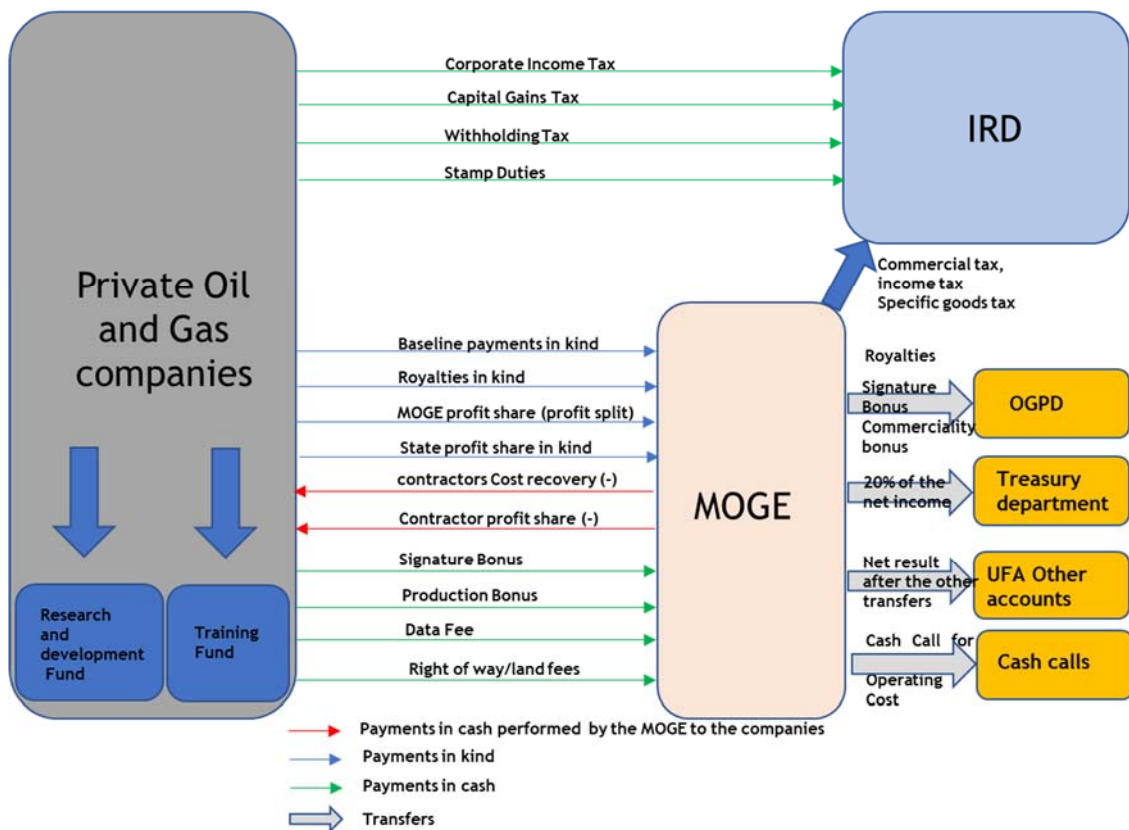
The operator transfers the baseline payment to the MOGE based on a formula established by the agreement. The difference between the total production and the baseline payment is **the incremental production**.

Then, the operator establishes the total cost supported related to this project in USD, then this amount is converted in number of barrels.

The cost recovery (in kind) is transferred to the MOGE representing 40% of the total cost supported by the operator, 60% of this cost is paid by the MOGE to the operator in cash.

The difference between the incremental production and the cost recovery converted in number of barrels represent the risk compensation. The MOGE keeps 65% of this amount in kind. The equivalent of 35% of this amount is paid in cash to the operator.

## IPR contracts

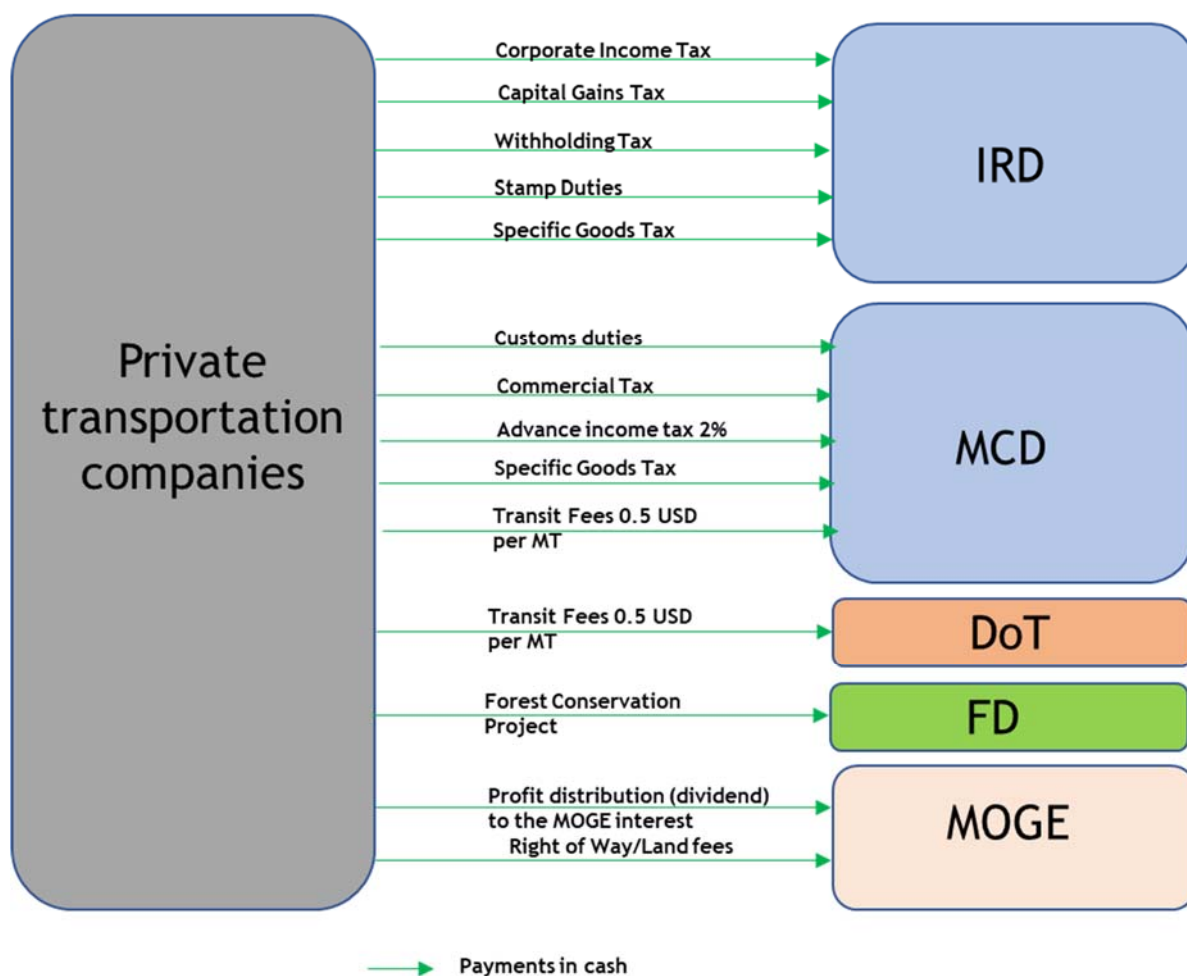


The main idea in this type of contract is that the MOGE receives the total production in kind and pay the company in cash.

We also include the following ideas in order to clarify the fiscal regime of the IPR contract :

- The Baseline payment Is calculated according to the contract ;
- Incremental production = (Total production - baseline) ;
- Royalties in kind is calculated as follows: (total production - baseline) \* (10% +2.5%);
- Cost recovery : is calculated based in the incremental production after the deduction of royalties. 50% of the remaining quantity is used to determine the amount in cash to be paid by the MOGE to the company;
- Profit share : The remaining quantity (after the deduction of the baseline, royalties and cost recovery) is divided between company and MOGE : MOGE receive the profit share in kind : 55% in kind and company receive 45% in cash;

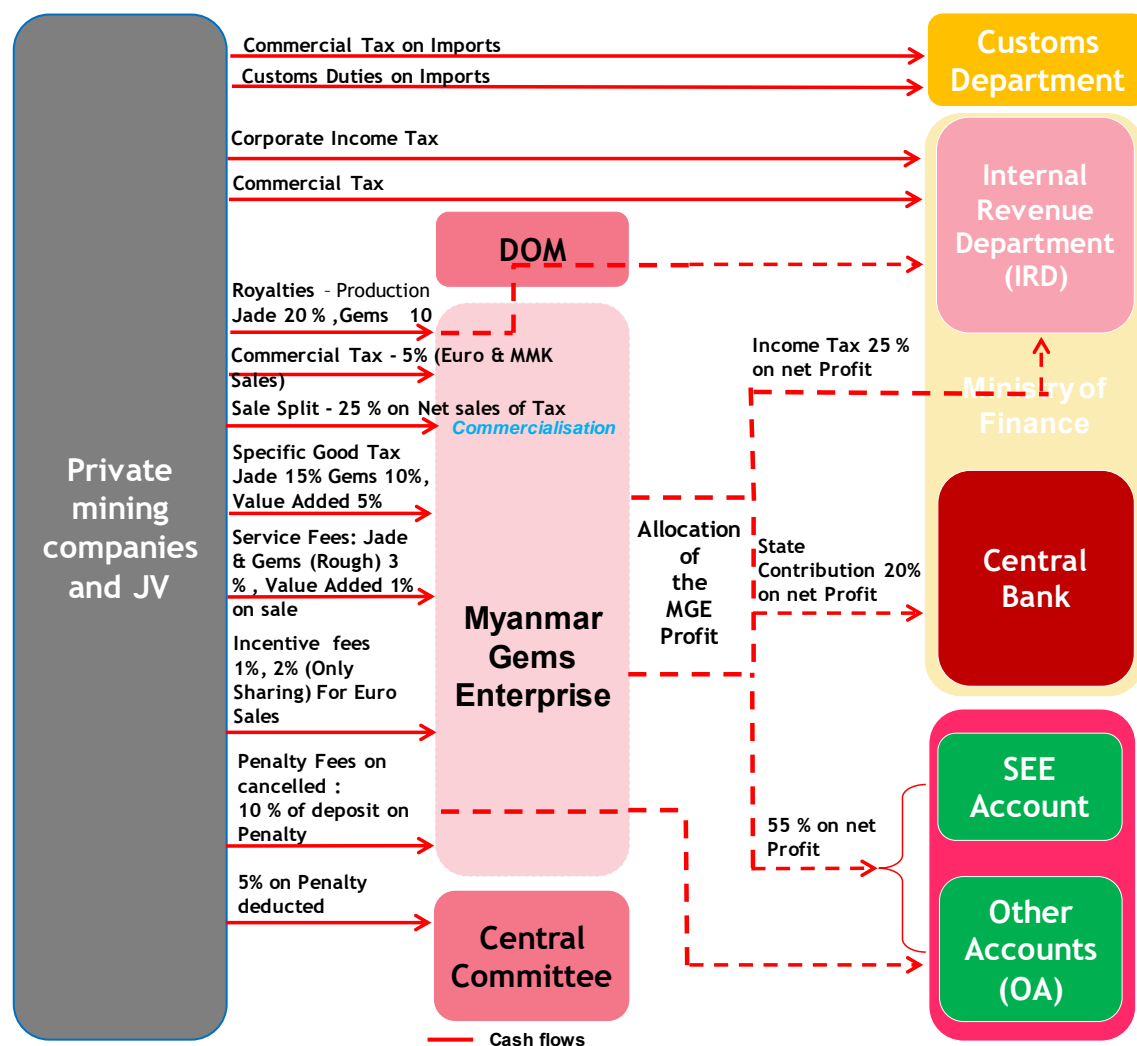
### 3.6.2. Transportation of oil and gas payments flow



The definition of the payment flows is presented in the section 4.2.7. For the forest conservation project payment, this payment flow is performed by transportation companies to support Tanintharyi Nature Reserve. However, this payment was not reported by any of the transportation companies.

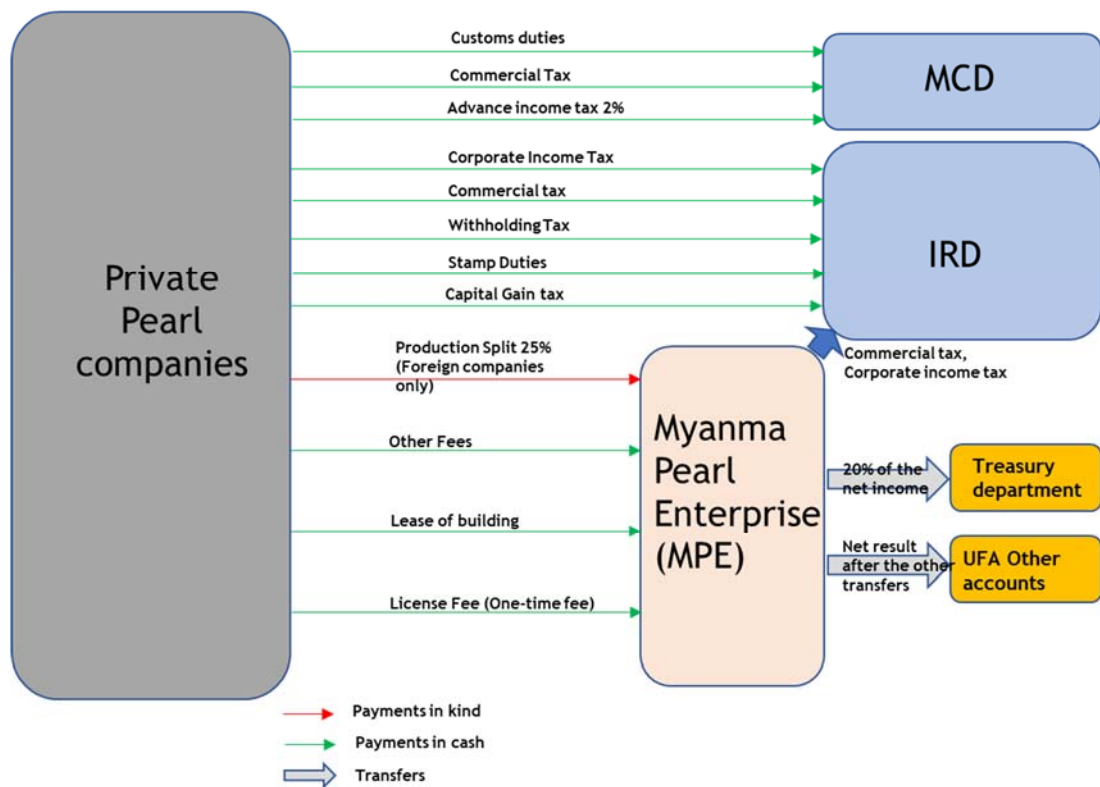
### 3.6.3. Mining sector payments flow

#### a. Jade and Gemstones



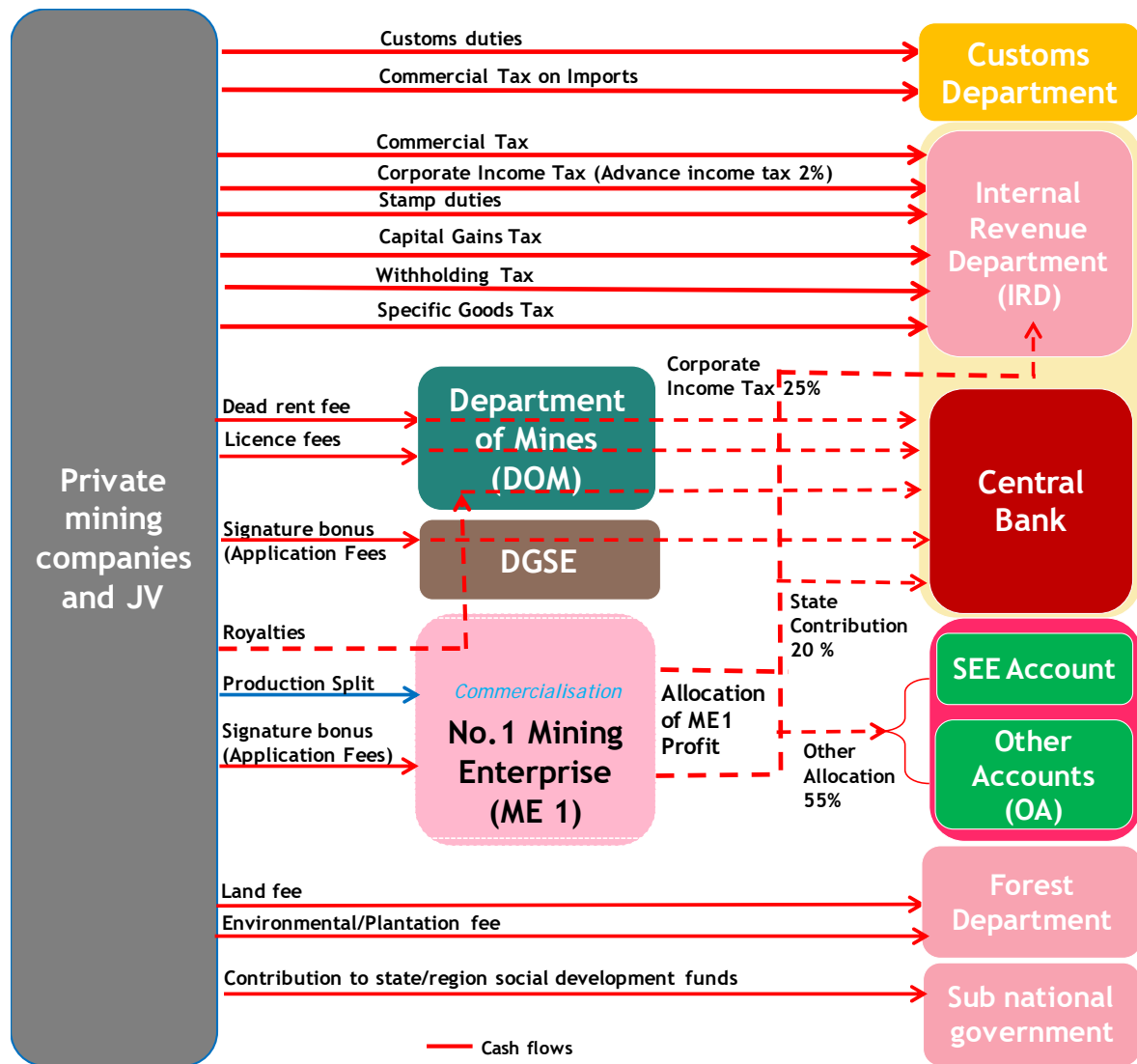
□ Incentive Fees are collected as below  
 (After deducted Specific Good Tax and Service Fees on sales)  
 US\$ 1-100000 = 2 %  
 US\$ 100001-300000 = 1.5 %  
 US\$ 300001-400000 = 1.25%  
 US\$ 400001 and above = 1%

b. Pearl companies



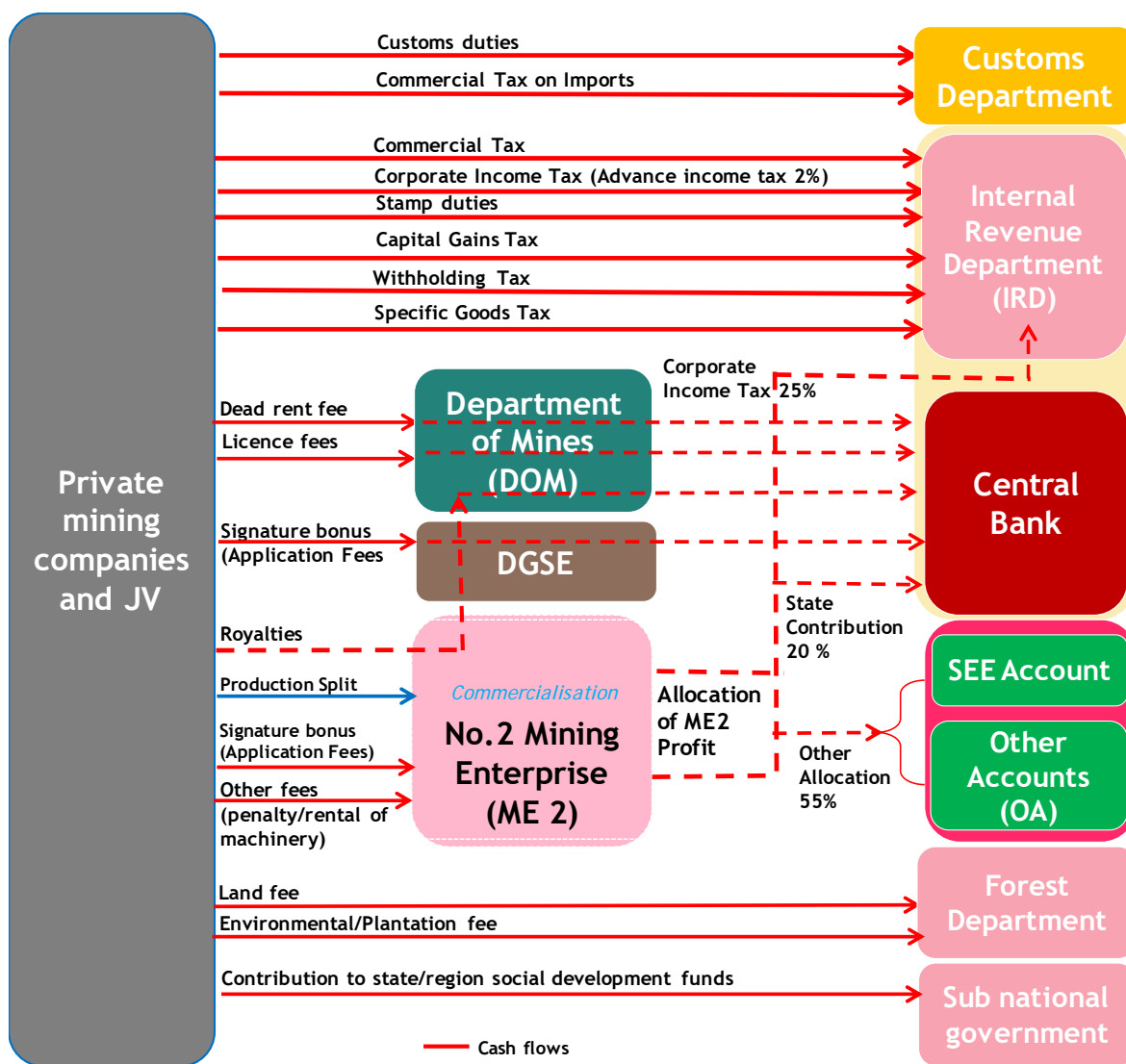
c. Other minerals

For companies paying taxes to ME1 :





For companies paying taxes to ME2 :



### 3.6.4. the Union Fund Account-Other Accounts (UFA-OA)

#### Management of the UFA-OA

The letter No. Ba-4/Budget/(5/2015) of the Budget department dated 5-March-2015 related to the management of the Union Fund Account-Other Accounts present the general rules governing inflows and outflows of the Union Fund Account-Other Accounts (UFA-OA) opened at the level of the SOE's.

According to this letter, The type of revenues received by the SOEs must be deposit into its respective (UFA-OA) are :

- sales of product production (or) operation income
- licence and entrance fees, profit share of JV and partners which are under other income received.

The following SOEs revenues should be deposit in the SOEs normal accounts :

- Confiscate as fine
- Deposits according to audit finding
- Deposit of surplus from union budget fund, income form change

- Income from rental of fixed assets

This letter presents also the type of expenses to be funded by the SOE normal account and expenses to be funded from its owned other account. In fact, according to this letter :

- Expenses to be funded by the SOE's OA: the raw material purchase expenses, production/ operation expenses, commercial tax, income tax and state contribution are incurred by the SOE's own OA account;
- Expenses to be funded by the SOE's normal account :Other production expenses, administration expenses, selling and distribution expenses, research and development expenses and financial expenses.

#### Calculation details of the amount transferred to SOEs-OA :

According to our discussion with the Budget department, we understand that the amounts to be transferred to this account are calculated as follows:

Revenues	XXXX	
Less: Expenses	(xxxx)	
Add: Other Income	Xxxx	
Profit	Xxxx	
Less: CT	(xxxx)	
Less: SGT	(xxxx)	
Profit before tax	Xxxx	A
Income (25% x A)	(xxxx)	
State Contribution (20% x A)	(xxxx)	
Other account (OA) - (55% x A)	Xxxx	

#### The budget department UFA-OA auditing process :

- The Budget Department requests the audited closing balances by AOG of OAs from every SOEs;
- The Budget Department requests the OAs' closing balances and bank statements of each SOEs from Myanmar Economic Bank (MEB)
- The Budget Department reconciled the data received from SOEs with MEB.
- If there is any discrepancy, the budget department requests the SOEs to reconcile the balances with the MEB and respond by a formal letter.
- After reconciled the OA balances of SOEs, the Budget Department recorded the closing balances of OA for each SOE.

#### MOGE OA inflows-outflows details :

According to the data reported by the MOGE, the UFA-OA the payments flows are detailed as below :

Table 86 : MOGE OA inflows-outflows details

		Figures in MMK
No.	UFA-OA MOGE details	Amount
1	Opening Balance as of 1 April 2017	5,598,952
	<b>Add: Total Received Amount</b>	<b>2,376,750</b>
	In-flow of revenues during the year	2,376,750
	a) Income from Sale of Crude Oil ,Natural Gas and CNG(Onshore)	180,516
2	b) Income from Sale of Natural Gas and Condensate(Offshore)	1,743,690
	c) Income from Service Chgs Of PSC Contract including Handling charges	1,221
	d) Miscelleous revenue including lending revenues and Vice President Salary...)	98,448
	e) Receipt of Royalty and Bonus	352,874
	<b>Less: Total Expenditure Amount</b>	<b>(1,692,899)</b>
	Payments made during the year	(1,692,899)
	a) 5% Commercial Tax	(233,671)
	b) 8% Specific Goods Tax	(293,326)
3	c) State Contribution	(114,832)
	d) Income Tax	(143,540)
	e) Cash Call for Offshore Operating Cost	(283,258)
	f) Other Expenses (i.e. Salaries, Pension, Variable Cost, Fixed Cost	(271,398)
	g) Transfer to OGPD (Royalty and Bonus)	(352,874)
4	Closing balance as of 31 March 2018	6,282,803

#### MGE OA inflows-outflows details :

According to the data reported by the MGE, the total amount transferred to the UFA-OA is :

Table 87 : MOGE OA inflows-outflows details

		Figures in MMK
No.	UFA-OA MGE details	Amount
1	Opening Balance as of 1 April 2017	687,514
2	<b>Add: Total Received Amount</b>	<b>181,125</b>
	In-flow of revenues during the year	181,125
3	<b>Less: Total Expenditure Amount</b>	<b>(108,765)</b>
	Payments made during the year	(108,765)
4	Closing balance as of 31 March 2018	759,874

#### ME1 OA inflows-outflows details :

According to the data reported by the ME1, the UFA-OA the payments flows are detailed as below :

Table 88 : ME1 OA inflows-outflows details

		Figures in MMK
No.	UFA-OA ME1 details	Amount
1	Opening Balance as of 1 April 2017	62,860
	<b>Add: Total Received Amount</b>	<b>21,983</b>
	In-flow of revenues during the year	
2	a) Production Split	16,832
	b) Sale(Mill Tailing)	3,845
	c) Application Fees	-

No.	UFA-OA ME1 details	Amount
	Less: Total Expenditure Amount	(19,288)
	Payments made during the year	
3	a) Pension expenditure	(3,706)
	b) Corporate Income Tax expenditure	(7,538)
	c) State Contribution	(6,030)
	d) Salary & wages	(869)
4	Closing balance as of 31 March 2018	65,555

#### ME2 OA inflows-outflows details :

According to the data reported by the ME2, the UFA-OA the payments flows are detailed as below :

Table 89 : ME2 OA inflows-outflows details

		Figures in MMK
No.	UFA-OA ME2 details	Amount
1	Opening Balance as of 1 April 2017	103,777
2	Add: Total Received Amount	21,657
	In-flow of revenues during the year	21,657
3	Less: Total Expenditure Amount	(13,423)
	Payments made during the year	(13,423)
4	Closing balance as of 31 March 2018	112,011

#### MPE OA inflows-outflows details:

According to the data reported by the MOGE, the UFA-OA the payments flows are detailed as below :

Table 90: MPE OA inflows-outflows details

		Figures in MMK
No.	UFA-OA MPE details	Amount
1	Opening Balance as of 1 April 2017	37,134
2	Add: Total Received Amount	15,108
	In-flow of revenues during the year	15,108
3	Less: Total Expenditure Amount	(7,569)
	Payments made during the year	(7,569)
4	Closing balance as of 31 March 2018	44,673

#### The merger and the abolition of the SOEs UFA OA:

According to the union government meeting no, (5/2019) resolution, the closing balance of the other Union Fund Account- Other Account (UFA-OA) deposit to the Union budget Fund account in FY 2019-2020. Therefore, UFA-SOE Account and UFA-OA Account which are entitled for 20 SOEs in will be combined to one account as Union Budget Fund of all SOEs.

We understand that this step was a preliminary step before the abolition of those accounts. In fact, in June 2019, Myanmar's cabinet issued a directive to abolish the Other Accounts and as a result, state-owned enterprises (SOEs) will have to transfer all of their net income to the Union government, and not their own accounts.

## 3.7. Beneficial Ownership (BO)

### 3.7.1. BO context in Myanmar

Following the review of government's policy regarding the BO disclosure and the legislation regulating the publication of those data, we note that the 2017 Myanmar Company Law introduced the ownership interest concept on both direct and indirect shareholding, regulating transfer of shares relevant to overseas corporations for foreign shareholdings. The 2014 Anti-Money Laundering Law provides a definition of BO and domestic and international politically exposed persons (PEPs) that are aligned with international best practices. The 2013 Anti-Corruption Law promotes transparency of the rule of law and governance sector. DICA issues an Anti-Corruption Code of Ethics for Companies and Body Corporates, requiring all companies and body corporates that are incorporated within the Union to carry out business activities in line with the code of ethics of 03 August 2018. The 2016 Myanmar Investment Law provides conflict of interest provisions relevant to Commissioners and the PEP requirement.<sup>80</sup>

### 3.7.2. BO task force and progress in the implementation of BO register

A BO task force for extractive industries was set up on 30 June 2018 through an order No. 60/2018 by MOPF. It comprises 13 members representing the MEITI National Coordination, directors from DOM, MOGE, DICA, the Attorney General Office (AGO), the Office of Auditor General (OAG), CBM, the Anti-corruption Commission and the Financial Information Unit as well as two representatives from the private sector and two representatives from civil society organisations.

The terms of reference of the BO Task Force is set out below:

- prepare and implement the Work Plan in order to implement BO Roadmap;
- identify a focal agency - the agency that shall lead in the implementation of Work Plan;
- identify the agency(ies) that is (are) best suited to collect, maintain and disclose BO data;
- recruit a consultant for the implementation of BO if deemed necessary
- undertake consultations and develop amendments to the legal framework and implementing regulations in order to embed the requirement for BO disclosure (including sanctions or incentives for BO disclosure; level of detail of BO disclosures; data validation and frequency of updates);
- oversee and support while reviewing relevant national laws, regulations and orders in extractive sector;
- support in reviewing to the relevant national laws and regulations to assess whether the BO and Political Exposed Person (PEP) definitions developed by METI align fully with the existing national legislation and developing amendments as necessary;
- oversee and support in reviewing relevant national laws, regulations and contractual terms to assess whether there are any legal or regulatory barriers to disclosure of BO (for example, confidentiality clauses).
- initiate with the Sector Specific approach to BO disclosure;
- support the implementation of the BO on a pilot scale;
- implement the activities for timely disclosure of BO data in the MEITI report since 1 January 2020 in compliance with the 2016 EITI Standard;
- hold BO Task Force meetings for coordination as required;
- implement decisions of BO Task Force meetings;
- make suggestions for BO activities to MEITI Working Committee meeting;
- develop and propose transitional arrangements to the EITI International Secretariat to meet the 1 January 2020 requirement, if deemed necessary;

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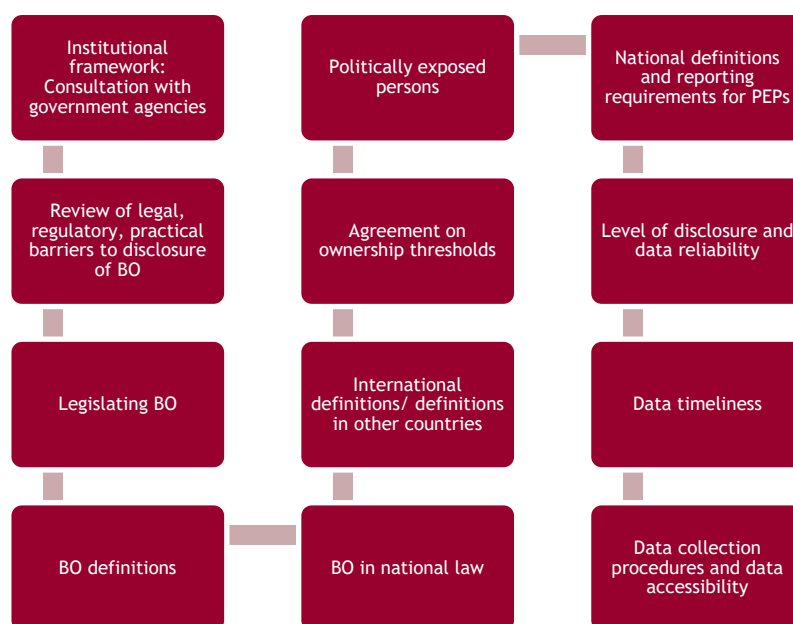
<sup>80</sup> BO Progress Information for Short Publication provided by NCS Technical Team

- provide guidance on the work of the National Coordination Secretariat (NCS) in regard to BO; and
- receive relevant national and international training and workshop related to BO.

BO for Myanmar has twelve components that contribute to successful implementation (refer to the figure below). In addition, it will benefit the national procurement and public infrastructure projects, should the government mainstream the BO practices in procurement.

The Draft Beneficial Ownership Roadmap of Myanmar can be presented below <sup>81</sup>

**Chart 24 : Draft Beneficial Ownership Roadmap**



We understand that Myanmar EITI has conducted awareness-raising activities with government, companies and civil society organisations. The EITI Multi-Stakeholder Group (MSG) is adopting a phased approach to implement reforms with concrete short and long-term plans on data collection, first through EITI Reports and eventually through systematic disclosures by DICA. Details on beneficial owners have been disclosed through a pilot report published in 2018<sup>82</sup>.

We also understand the Myanmar government issued a notification on the 2 October 2019 and confirmed the mandate of the Beneficial Ownership Task Force to make decisions regarding ownership disclosures and empowers the Directorate of Investment and Company Administration (DICA) to implement them. The notification also paves the way for several companies and state-owned enterprises operating in Myanmar's oil and gas production and transportation, mineral, pearl, jade and coloured gemstone industries to disclose their beneficial owners by January 1, 2020.

<sup>81</sup> [https://eiti.org/sites/default/files/documents/bo\\_roadmap\\_-\\_myanmar.pdf](https://eiti.org/sites/default/files/documents/bo_roadmap_-_myanmar.pdf)

<sup>82</sup> [https://eiti.org/sites/default/files/documents/eiti\\_myanmar\\_bo\\_pilot\\_report-final.pdf](https://eiti.org/sites/default/files/documents/eiti_myanmar_bo_pilot_report-final.pdf)

### 3.7.3. EITI requirements

The 2016 EITI Requirement recommends that implementing countries maintain a publicly available register of the beneficial owners of the corporate entity(ies) that bid for, operate or invest in extractive assets, including the identity(ies) of their beneficial owner(s), the level of ownership and details of how ownership or control is exerted. Where possible, beneficial ownership information should be incorporated in existing filings by companies to corporate regulators, stock exchanges or agencies regulating extractive industry licensing. Where this information is already publicly available, the EITI Report should include guidance on how to access this information.

The EITI standard provides a basic definition of beneficial ownership, and states that the information made available should include the identity of each company's beneficial owner or owners, and their level of ownership. Where information is already publicly available, for example, through stock exchange disclosures, EITI reports should include guidance on how this information can be accessed.

#### *Beneficial Ownership as defined by the EITI Standard*

- i) A beneficial owner in respect of a company means the natural person(s) who directly or indirectly ultimately owns or controls the corporate entity*
- ii) The multi-stakeholder group should agree an appropriate definition of the term beneficial owner. The definition should be aligned with (f)(i) above and take international norms and relevant national laws into account and should include ownership threshold(s). The definition should also specify reporting obligations for politically exposed persons.*
- iii) Publicly listed companies, including wholly owned subsidiaries, are required to disclose the name of the stock exchange and include a link to the stock exchange filings where they are listed.*
- iv) In the case of joint ventures, each entity within the venture should disclose its beneficial owner(s), unless it is publicly listed or is a wholly owned subsidiary of a publicly listed company. Each entity is responsible for the accuracy of the information provided.*

### 3.7.4. Definition of beneficial ownership

Based on the review of Myanmar's legal framework which does not include provisions relating to the beneficial ownership definition or disclosure and taking into account EITI Requirement 2.5, the following definition of Beneficial Ownership is adopted by the MSG:

#### **Definition of beneficial ownership**

*In accordance with the EITI Standard 2019, Requirement 2.5.f.i, with the decision of the MEITI Multi Stakeholder Group, a beneficial owner is defined as:*

- 1. The individual holds, directly or indirectly, 5% and above of the shares in the public or private company or corporate entity.*
- 2. The individual holds, directly or indirectly, 5% and above of the voting rights in the public or private company or corporate entity.*
- 3. The individual holds the right, directly or indirectly, to appoint or remove a majority of the board of directors of the public or private company or corporate entity.*
- 4. The individual has the right to exercise, or actually exercises, significant influence or control over the public or private company or corporate entity. (Reference to "ultimately owns or controls" refer to situations in which ownership/control is exercised through a chain of ownership or by means of control other than direct control. This definition should also apply to a beneficiary under a life or other investment.")*
- 5. For shareholding entities:*
  - i. which are state-owned enterprises or their subsidiaries, disclose the parent ministry and country.*
  - ii. which are publicly listed, disclose the name of the stock exchange and a web link to stock exchange filings.<sup>83</sup>*

The following definition of Politically Exposed Persons (PEPs) is adopted by the MSG:

#### **Politically Exposed Persons (PEPs)**

*Politically exposed persons (PEPs)*

*Definition. Politically exposed persons (PEPs) within the Myanmar EITI framework are defined as individuals who are or were entrusted with prominent public functions, either domestically or internationally. The coverage also includes:*

- 1. family members defined as individuals related to a PEP, by common ancestry, through marriage or similar forms of partnership; and*
- 2. close associates defined as those who are closely connected to a PEP in their public roles, either socially or professionally.*

*Coverage. For detailed coverage of individuals defined as PEP in Myanmar, refer to the link:*

*[https://myanmareiti.org/sites/myanmareiti.org/files/publication\\_docs/bo\\_pep\\_coverage\\_eng\\_0.pdf](https://myanmareiti.org/sites/myanmareiti.org/files/publication_docs/bo_pep_coverage_eng_0.pdf).*

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<sup>83</sup> [https://myanmareiti.org/sites/myanmareiti.org/files/publication\\_docs/beneficial\\_ownership\\_definitionupdate.pdf](https://myanmareiti.org/sites/myanmareiti.org/files/publication_docs/beneficial_ownership_definitionupdate.pdf)



### 3.7.5. BENEFICIAL OWNERSHIP REPORTING

The MSG agreed in its 25th meeting resolution held on 27 November 2019:

- for the companies from BO Data Collection Phase I to update their BO Data and;
- to collect BO Data for any additional companies from 5th MEITI Report Scope which are not part of BO Data Collection Phase I.

This means that the information wasn't requested within the reporting templates addressed to the companies included in the scope but will be extracted from the external B.O report prepared exclusively for this purpose.

Following the "Final Report of the BO Data Disclosure Analysis Consultant"<sup>84</sup> prepared by the consultant "Charlotte Boyer" in January 2020, the 162 companies included in the scope of the 4th MEITI report (FY 2016-2017) were requested to disclose their beneficial owners through an online form before 28 October and 8 November 2019.

Charlotte's latest report dated 20 Feb states that "121 companies submitted their form on time, or a submission rate of 74%. Among the submitted forms, 80 were judged fully filled-in with consistent information, while 10 were categorized as containing minor errors or omissions, and 31 as containing significant gaps undermining the credibility of the data or translating a weak understanding of the beneficial ownership requirements. In total, 270 beneficial owners were reported, among them 261 natural persons. 90% of the beneficial owners are natural persons exerting their control through direct shares, illustrating how companies have, in their overwhelming majority, straightforward structures with beneficial owners being the shareholders." Table below shows the status of companies' submissions by sector:

Table 91 : B.O companies follow up

Sub-Sector	B.O not submitted	B.O submitted	Total	%
Jade & Gems	15	68	83	81%
Mining	10	20	30	68%
Oil and Gas	12	19	31	61%
Oil and Gas Transportation	3	1	4	25%
Pearl	1	9	10	90%
SOE	1	4	5	80%
<b>Total</b>	<b>42</b>	<b>121</b>	<b>163</b>	<b>74%</b>

The data was published online on 28 December 2019 at <https://bo.dica.gov.mm/>. The report is a review of the data that was disclosed by the 121 companies who submitted a BO form before the deadline.

After reviewing the first MEITI beneficial ownership disclosure, we noted that 240 companies from the 2017-2018 scope were not included in the disclosure because they were not under the scope in the first disclosures. The table below details the companies selected in the 2017-2018 scope which were included in the BO disclosure:

<sup>84</sup> [https://myanmareiti.org/en/publication/review-first-meiti-beneficial-ownership-disclosure?fbclid=IwAR1H4KJAG5QJJ4B6eOfpsuy\\_Odjm4YG25pEre5wm6\\_zQVC4jrnvaRU89ydm](https://myanmareiti.org/en/publication/review-first-meiti-beneficial-ownership-disclosure?fbclid=IwAR1H4KJAG5QJJ4B6eOfpsuy_Odjm4YG25pEre5wm6_zQVC4jrnvaRU89ydm)

**Table 92: Review of the first M-EITI beneficial ownership disclosure**

Sector	2017-2018 Scope	Review of the first M-EITI beneficial ownership disclosure					2017-2018 Scope (companies not contacted)
		Fully completed BO Form	BO Form submitted with Minor Gaps	BO Form submitted with Significant Gaps	BO Form Not Submitted	Total Companies contacted to submit a BO Form	
Jade & Gems	209	49	2	6	12	69	140
Mining	94	11	1	5	7	24	70
Oil and Gas	56	4	3	10	11	28	28
Oil and Gas Transportation	5	-	-	1	3	4	1
Pearl	11	7	-	2	1	10	1
SOE	5	2	1	1	1	5	-
Other companies	-	7	3	6	8	-	-
<b>Total</b>	<b>380</b>	<b>80</b>	<b>10</b>	<b>31</b>	<b>43</b>	<b>140</b>	<b>240</b>

## Auditing and accounting

### 3.8.1. Private companies

Under the Myanmar Company Law 2017, companies must keep proper books of accounts at their registered office. Financial statements must be prepared in accordance with Myanmar Accounting Standards (MAS).

Accounting practices in Myanmar have been historically based on British accounting standards and Generally Accepted Accounting Principles (GAAP). For several years, Myanmar adopted International Accounting Standards for reporting purposes, while the Myanmar Accountancy Council (MAC), through the Myanmar Institute of Certified Accountants (MICPA) has adopted the majority of International Accounting Standards that existed in 2003 and 2004. In 2010, MAC withdrew all 30 of International Accounting Standards and replaced them with 29 new Myanmar Accounting Standards and 8 new Myanmar Financial Reporting Standards that were identical to the 2010 International Financial Reporting Standards (IFRS). Such standards were published in the Official Gazette and became effective on 4 January 2011. Public companies and financial institutions are required to apply MFRS (Myanmar Financial Reporting Standards, which are a word-for-word equivalent of IFRS). SMEs must apply MFRS for Small and Medium Enterprises (SMEs) (word-for-word equivalent of IFRS for SMEs).

Recently, the Myanmar Accountancy Council (MAC) has signed the agreement for the Supply of Data for the Adoption and Publication of IFRS Standards between Myanmar Accountancy Council and IFRS Foundation Cooperation in order to adopt International Financial Reporting Standards (IFRS) in Myanmar. In July 2018, MAC announced the adoption of the latest versions of IFRS standards for financial reporting periods beginning in or after the 2022-2023 financial year for both public companies, financial institutions and SMEs. Early adoption of IFRS standards is permitted.

The tax assessment year runs from 1 April to 31 March. This is mandatory even for branches of foreign companies which may have a different financial year-end. The Myanmar Internal Revenue Department (IRD) issued a Letter on 15 May 2019 confirming the change of fiscal year end from 1 April - 31 March to 1 October - 30 September that shall apply to co-operatives and private enterprises from 1 October 2019. This confirmation is in line with the provisions in the Union Taxation Law 2018 (UTL 2018) and Union Taxation Law 2018-2019 (UTL 2018-2019) stating that the fiscal year for Income Tax Law shall be the same for all taxpayers including both private taxpayers and state owned enterprises, starting from 1st October 2019.

The Myanmar Companies Act 1914 and subsidiary legislation (Myanmar Companies Rules 1940 and Myanmar Companies 18 Detailed Report Regulations 1957) (together, the Companies Legislation) govern the conduct of companies and company affairs in Myanmar today. The Companies Legislation contains annual reporting requirements for companies registered in Myanmar, including the

preparation of statutory reports setting out the share capital and details of the receipts and payment of a company (Section 148 of the Myanmar Company Law 2017) and financial reports containing balance sheets and profit and loss statements (Section 260 of the Myanmar Company Law 2017). Such reports are required to be audited and sent to the Companies Registrar as well as members of the companies. The Companies Legislation also imposes certain auditing requirements for companies in which the Government holds shares (Section 282 of the Myanmar Company Law 2017). The Myanmar Company Law 2017 also requires companies to appoint an auditor and companies are required to submit audited financial statements to the tax authorities annually by 31 December.

Section 285 of the Myanmar Company Law 2017 requires an auditor to report to the members of a company on the financial statements examined by the auditor at the annual general meeting. The auditor's report must state, amongst others, whether or not in their opinion the balance sheet and profit and loss account referred to in the auditor's report are drawn up in accordance with law, whether or not the balance sheet gives a true and fair view of the state of affairs of the company. The opinion should also state whether the company's accounting records have been kept by the company as required by law.

In practice, however, the financial reporting and auditing provisions of the Companies Legislation are not comprehensively or consistently applied and there is limited transparency on the financial affairs of companies in Myanmar today.

Myanmar Companies Law was enacted by the Pyidaungsu Hluttaw on 6 December 2017, replacing the Myanmar Companies Act of 1914. The requirements of Financial Reports and Audit are prescribed in Division 24 of the Law. The requirement of Repeal of certain existing Regulations and continued effect of others is prescribed in Article 471,472 of the Law.

The companies selected in the EITI scope were required to confirm whether their financial statements for the period covered by this report had been audited. Details on the confirmations received can be found in Annex 7 of the report.

### **3.8.2. Public sector and SOEs**

In Myanmar there is a special Government Agency - Office of the Auditor General of the Union (OAGM) - the supreme audit institution of Myanmar, which is accountable to the President and the Parliament simultaneously. This body carries out controls over the execution of the State's budget and payment of taxes and other mandatory payments, including payments from SOEs and partners.

OAGM was set up under the 2008 Constitution as an independent agency, for the appointment of the Auditor General. This was made by the President with the approval of the Parliament.

OAGM performs audits consistent with Generally Accepted Auditing standards comparable with International Organisation of Supreme Audit Institutions (INTOSAI) audit standards.

All SOEs are required to submit bi-annual financial reports which have been prepared in accordance with Generally Accepted Accounting Standards to OAGM. According to OAGM, the annual audit includes all tax and non-tax payments made by all partners to the extractive industries sector project. Other Accounts, held by the SEEs, are state fund accounts that are audited by the OAGM, as are all the state accounts held at MEB.

Union Auditor General has the authority to audit government ministries, SOEs and to give comment on the appointment of their Joint Ventures auditors. According to the amendment of Union Auditor General Law (2018), the Union Auditor General has a duty to audit the Joint Ventures companies jointly owned by the Government, if necessary. The Union Auditor General also has a duty to re-audit the accounts of private companies which have been already audited by a certified public accountant and practicing accountant relating to taxes and revenues to be paid to the Union if necessary, but currently lacks the capacity and the resources to do so. OAG's effectiveness and capacity to hold government ministries, SOEs and the Parliament to account has yet to be determined, and its reports are not disclosed to the public.

OAGM sends bi-annual summary reports both to the President and the Parliament simultaneously. However, there are no penalties for delayed submissions.

The Union Auditor General is also Chairman of the Myanmar Accountancy Council which deals with accounting standards in Myanmar. Accounting standards have been developed for the commercial sector which is also applicable to SOEs in the “commercial” form of their accounts. But, to date, there are no standards or statements of practice that apply to the Government's financial statements which include SOEs activities prepared on a cash basis in parallel.

Government departments maintain their accounting system on cash basis, while SOEs maintain their accounting system on the accrual basis. However, the current form of the financial statements does not fully reflect the IPSAS requirements.

## 4. DETERMINATION OF THE RECONCILIATION SCOPE

### 4.1. Introduction

The EITI Standard defines materiality as follows: “Payments and revenues are considered material if their omission or misstatement could significantly affect the comprehensiveness of the EITI Report.”

Different ways could be used to define materiality for the 2017-2018 EITI Report. The most common way consists of defining materiality in terms of a minimum value of payment to government, the other could be based on the size of the company (for example, a minimum annual size) or the type of permit held (large scale, production).

The purpose of this section is to propose thresholds so that the reconciliation report covers all material payments and revenues from the extractive sector in Myanmar. The materiality analysis in this report was based on company data provided by Government Agencies on the basis of the aggregate of their projects rather than on the projects themselves.

The aggregate tax data used includes all relevant benefit streams stated in oil and gas and mining legislations. Common taxation including CIT, CT and specific Goods Tax and customs duties were also considered during the materiality analysis.

### 4.2. Analysis of payments to government

#### 4.2.1. Common taxation analysis (tax revenue streams)

##### Payments flows

The Internal Revenue Department (IRD) within MoPF is responsible for the collection of taxes revenue streams. The documentation received from IRD shows six (6) types of taxes paid by extractive companies:

Table 93: List of payments collected by the IRD from the private companies

Sector	In billion kyats					
	Commercial Tax	Corporate Income Tax	Specific Goods Tax	Withholding Tax	Capital Gain Tax	Stamp Duty
Mining	39.395	59.073	1.260	1.047	0.007	0.018
Oil & Gas	56.690	38.228	-	1.560	-	-
Oil & Gas Transportation	0.733	184.682	-	-	-	-
Pearl	0.009	0.184	-	0.020	-	-
Gems & Jade	11.097	16.885	86.622	0.684	0.109	0.000
<b>Total</b>	<b>107.924</b>	<b>299.053</b>	<b>87.882</b>	<b>3.312</b>	<b>0.116</b>	<b>0.018</b>

The list of taxes and payments collected by IRD from State-owned Enterprises (SOE) and reported by IRD are as follows:

Table 94: List of payments collected by the IRD from the SOEs

Sector	In billion kyats		
	Commercial Tax	Income Tax	Specific Goods Tax
No. 1 Mining Enterprise (ME1)	0.03	7.54	-
No. 2 Mining Enterprise (ME2)	0.06	1.55	-
Myanmar Gems Enterprise (MGE)	0.00	55.67	0.18
Myanmar Pearl Enterprise (MPE)	0.15	2.89	-
Myanmar Oil and Gas Enterprise (MOGE)	153.66	143.54	292.89
<b>Total</b>	<b>153.91</b>	<b>211.19</b>	<b>293.07</b>

The Customs Department within MoPF is responsible for the collection of customs duties. The 2017-2018-income reports shows two types of taxes paid by extractive companies:

**Table 95 : List of payments collected by the MCD from the private companies**

In billion MMK						
Sector	Custom duties		Commercial taxes		Total Custom duties	Total Commercial tax
	Border import	Normal import	Border import	Normal import		
Gems and Jade companies		1.82		2.52	1.82	2.52
Mining companies	0.25	1.59	0.4	3.27	1.84	3.67
Pearl companies	1.67	0.01	0.12	0.02	1.68	0.15
<b>Grand Total</b>	<b>5.34</b>		<b>6.33</b>		<b>5.34</b>	<b>6.34</b>

### Scope decided by the MSG

Based on the above, the payment flows of the tax revenues flows collected by IRD and the Customs Department that was decided to include by the MSG in the 2017-2018 reconciliation are detailed below:

N°	Payment flows	Governmental Agency
1	Corporate Income Tax	Internal Revenue Department (IRD)
2	Commercial Tax	Internal Revenue Department (IRD)
4	Capital Gains Tax	Internal Revenue Department (IRD)
3	Withholding Tax	Internal Revenue Department (IRD)
4	Stamp Duties	Internal Revenue Department (IRD)
5	Specific Goods Tax	Internal Revenue Department (IRD)
6	Customs duties (Normal and border imports)	Myanmar Customs Department (MCD)
7	Commercial Tax (Normal and border imports)	Myanmar Customs Department (MCD)
8	Advance income tax 2% collected by the MCD	Myanmar Customs Department (MCD)
9	Specific Goods Tax collected by the MCD	Myanmar Customs Department (MCD)

Those payment flows should be reported by all the companies (Oil and Gas, Oil and Gas transportation, Gems and Jade, other minerals and Pearl Sectors) without threshold.

In addition, the MSG decided to include the following entities and data in the reconciliation process:

- all SOEs in the reconciliation scope without applying a materiality threshold;
- all payments and transfers made by MONREC and MoEE to MoPF regardless whether they are recorded in the budget accounts or in off-budget accounts; and

the revenues collected for companies which have made payments below the proposed materiality thresholds through the unilateral disclosure by Government Agencies in accordance with EITI Requirement 4.2.b.

## 4.2.2. Oil and gas payments analysis (non-tax revenue streams)

### Payments flows

Following the analysis of the documentation received from MOGE, we identified the following payments:

Table 96 : List of payments collected by the MOGE from the private companies

Non-tax payment	Amount in cash	In billion kyats		%
		Amount in kind (in bbl)	Cumulative	
Production split	707	-	707	67%
Royalties in cash	309	-	1,016	96%
Signature Bonus	44		1,060	100%
Land Fee	1	-	1,061	100%
Royalties in kind	-	43,451	1,061	100%
<b>Total</b>	<b>1,061</b>	<b>43,451</b>		

Following to our discussion with the MOGE management and our understanding of the Oil and Gas sector, we identified 4 type of Oil agreements. We will present below the payments flows identified for every type of agreement :

### Production sharing contracts (PSC) :

The payment flows identified following the review for this type of contract are presented below :

Table 97 : Definition of payment flows

N°	Payment flows	Definition
1	Royalties in cash	Royalties are charged at the percentage (mentioned in the agreement) of the value of production. The same rate applies for both oil and natural gas. Royalties in Myanmar is paid in cash.
2	State profit share	the share of the state on the net profit after the deduction of the cost recovery and the profit split. This payment is calculated according to the % of interest of MOGE in the project.
3	MOGE profit share (profit split)	the share of the MOGE on the net profit after the deduction of the cost recovery
4	MOGE Cost recovery	the share of the MOGE on the cost recovery
5	Domestic sales to the MOGE ( - )	Sales of the production to the MOGE.
6	Signature Bonus	Amount paid upon conclusion of an O&G contract.
7	Production Bonus	Bonus paid to MOGE in proportion to the quantities of hydrocarbons produced. The amount of the Production Bonus is specified in the PSC.
8	Data fee	Data fee is levied only on offshore blocks. It is payable within 30 days after the signature of the agreement.
9	Right of way/land fees	Land fees is payable to the MOGE. The amount of the land rent is specified in the agreement.
10	Annual expenses of the Training Fund	The amount effectively spent from the training fund and not the amount allocated to this fund
11	Annual expenses of Research and Development Fund	The amount effectively spent from the Research and Development Fund and not the amount allocated to this fund

## Performance Compensation Contract (PCC) :

The payment flows identified following the review for this type of contract are presented below :

N	Payment flows	Definition
Payment in kind		
1	Baseline payments in kind	In-kind payment made by Oil and Gas companies to MOGE. The amount and payment modalities are detailed in the PCC (Performance Compensation Contracts) and IPR (Improved Petroleum Recovery Contract).
2	Cost recovery	the share of the MOGE on the cost recovery
3	Risk compensation	In-kind payment made by Oil and Gas onshore companies to MOGE. The amount and payment modalities are detailed in the agreements.
Payment in cash		
1	Cost recovery (-)	paid by MOGE to companies in cash
2	Risk compensation (-)	or profit sharing 35% paid by MOGE in cash
3	Signature Bonus	Amount paid upon conclusion of an O&G contract.
4	Production Bonus	Bonus paid to MOGE in proportion to the quantities of hydrocarbons produced. The amount of the Production Bonus is specified in the PSC.
5	Data fee	Data fee is levied only on offshore blocks. It is payable within 30 days after the signature of the agreement.
6	Right of way/land fees	Land fees is payable to the MOGE. The amount of the land rent is specified in the agreement.
7	Annual expenses of the Training Fund	The amount effectively spent from the training fund and not the amount allocated to this fund
8	Annual expenses of Research and Development Fund	The amount effectively spent from the Research and Development Fund and not the amount allocated to this fund

## Improved Petroleum Recovery contracts (IPR) :

The payment flows identified following the review for this type of contract are presented below :

N°	Payment flows	Definition
Payment in kind		
1	Baseline payments in kind	In-kind payment made by Oil and Gas companies to MOGE. The amount and payment modalities are detailed in the PCC (Performance Compensation Contracts) and IPR (Improved Petroleum Recovery Contract).
2	Royalties in kind	Royalties are charged at the percentage (mentioned in the agreement) of the value of production. The same rate applies for both oil and natural gas. Royalties in Myanmar is paid in kind.
3	MOGE profit share (profit split) in kind	the share of the MOGE on the net profit in kind
4	State profit share in kind	the share of the state on the net profit after the deduction of the cost recovery and the profit split.
Payment in cash		
1	contractor Cost recovery (-)	The cost recovery of the contractors paid in cash
2	Contractor profit share (-)	The contractor profit share 35% paid in cash
3	Signature Bonus	Amount paid upon conclusion of an O&G contract.
4	Production Bonus	Bonus paid to MOGE in proportion to the quantities of hydrocarbons produced. The amount of the Production Bonus is specified in the PSC.
5	Data fee	Data fee is levied only on offshore blocks. It is payable within 30 days after the signature of the agreement.
6	Right of way/land fees	Land fees is payable to the MOGE. The amount of the land rent is specified in the agreement.
7	Annual expenses of the Training Fund	The amount effectively spent from the training fund and not the amount allocated to this fund
8	Annual expenses of Research and Development Fund	The amount effectively spent from the Research and Development Fund and not the amount allocated to this fund



## Scope decided by the MSG

The MSG decided to include all the non-tax revenue streams in the scope of the 2017-2018 EITI report without applying a materiality threshold. To include the process of Training Fund, Research and Development Fund managed by MOGE.

Based on the above, the oil and gas payment flows that we propose to include in the 2017-2018 reconciliation scope may be summarised as follows:

Production sharing Contract (PSC)	
Payments in Cash	
1	Domestic sales to the MOGE ( - )
2	MOGE Cost recovery
3	MOGE profit share (profit split)
4	Production Bonus
5	Royalties in cash
6	State profit share
Performance Compensation Contract (PCC)	
Payments in kind	
7	Baseline payments in kind
8	Cost recovery
9	Risk compensation
Payments in cash	
10	Cost recovery (-)
11	Production Bonus
12	Risk compensation (-)
Improve Petroleum Recovery Contract (IPR)	
Payments in kind	
13	Baseline payments in kind
14	MOGE profit share (profit split) in kind
15	Royalties in kind
16	State profit share in kind
Payments in cash	
17	contractor Cost recovery (-)
18	Contractor profit share (-)
19	Production Bonus
Common payments to the different type of contracts	
Payments in cash	
20	Signature Bonus
21	Right of way/land fees
22	Data fee
23	Annual expenses of the Training Fund
24	Annual expenses of Research and Development Fund

### 4.2.3. Oil and gas transportation payments analysis (non-taxes revenues streams)

#### Payment flows

We noted that the following payment flows were included in the previous EITI reports:

Table 98 : Payment flows paid by the transportation companies

N°	Payment flows	In billion kyats
		Amount reported by MOGE (2017-18)
1	Profit Sharing Oil and Gas transportation	
2	Transit fees Oil and Gas transportation	
3	Road right fee Oil and Gas transportation	10.61

#### Scope decided by the MSG

The MSG decided to include all oil and gas transportation payments in the scope without applying a materiality threshold.

In accordance with Requirement 4.4 of the EITI Standard, tariff rates and volumes of the transported commodities should be reported in the EITI Report.

### 4.2.4. Gems and jade sector payments analysis (non-tax revenues streams)

#### Payments flows

According to the data provided by MONREC there are seven categories of fees and charges payable by Gems and Jade companies to the ministry. These fees and charges are set out in the table below:

Table 99 : Payment flows paid by the G&J companies

Payment	Amount	%	In billion kyats
			Cumulative
Permit fees	365.30	49%	49%
Specific goods tax	180.00	24%	74%
Sale Split	128.08	17%	91%
Service Fees - 3%	40.71	6%	97%
Royalties	23.89	3%	100%
Penalties	2.70	0%	100%
Commercial Tax	0.38	0%	100%
<b>Total</b>	<b>741.06</b>	<b>100%</b>	

#### Scope decided by the MSG

The MSG decided to include all non-tax revenue streams in the scope of EITI report without threshold. According to the above, the gems and jade payment flows that was decided to include in the 2017-2018 reconciliation scope may be summarised as follows:

Table 100 : Payment flows included in the G&J scope collected by the MGE

N°	Payment flows	Agency
1	Permit/licence fees	MGE
2	Specific goods tax	MGE
3	Sale Split	MGE
4	Service Fees - 3%	MGE
5	Royalties on production	DOM
6	Penalties	MGE
7	Commercial Tax	MGE

Following the review of the taxation regime of the Gems and Jade companies and the previous EITI reports, the MSG decided to include the following fees and payments in the 2017-18 scope without threshold.:

**Table 101 : Payment flows included in the G&J scope**

N°	Payment flows	Agency
1	Incentive fees	MGE
2	Environment/plantation fee	Forest Department
3	Land fees	Forest Department
4	In-kind: Production split	MGE
5	Royalties	MGE
6	Entrance fees	Central Committee

#### 4.2.5. Other minerals sector payments analysis (non-tax revenues streams)

##### Payment flows

According to the data provided by MONREC there are six categories of fees and charges payable by mining companies to the ministry. These fees and charges are set out in the table below:

**Table 102 : Payment flows included in the other minerals scope**

		In billion kyats		
N°	Payment	Amount	%	Cumulative
1	Production Split (Mineral Tax)	34.90	82%	82%
2	In Kind Royalties	3.16	7%	90%
3	Dead Rent Fee	2.76	6%	96%
4	Royalty	1.48	3%	100%
5	License Fee	0.10	0%	100%
6	Application Fee	0.03	0%	100%
Total		42.43	100%	

Moreover, following meetings held with MONREC and the Forestry Department, we identified the following additional non-tax payments:

**Table 103 : Payment flows included in the other minerals**

N°	Payment flows
1	Land Fees
2	Environment/plantation fees

Following the review of the taxation regime of the mining companies and the previous EITI reports, the following additional non-tax payments were identified:

**Table 104 : Payment flows collected by the ME1 and ME2**

N°	Payment flows	Agency
1	Production Split (In Kind)	(ME1 & ME2)
2	Application Fee	(ME1 & ME2)
3	Other fees (penalty/rental of machinery)	ME2

### Scope decided by the MSG

On the basis of the information provided by MONREC, the MSG decided to include all non-tax revenue streams in the scope of the 2017-2018 report without applying the materiality threshold. Accordingly, the mining payment flows that we propose to be included in the 2017-2018 reconciliation scope may be summarised as follows:

N°	Payment flows	Governmental Agency
1	Royalties	DOM
2	Dead Rent fee	DOM
3	Licence fee	DOM
4	Application Fee	DGSE
5	Land Fees	Forest Department
6	Environment/plantation fee	Forest Department
7	Production Split	ME1 / ME2
8	Application Fees	ME1 / ME2
9	Other fees (penalty/rental of machinery) (*)	ME2
10	In-kind Production split	DOM

### 4.2.6. Pearl sector payments analysis (non-tax revenues streams)

#### Payment flows

According to the data provided by MPE there are five categories of fees and charges payable by Pearl companies to the as follows:

N°	Payment	In Kyat	
		Amount	%
1	Royalty (Seeding Tax)	702,000,010	93.94%
2	Lease of Building	43,800,000	5.86%
3	Other Fees (Registration & Annual Fees)	1,477,000	0.20%
4	License Fee	-	0.00%
5	Production split 25% in kind (Foreign companies only)	62,575	
Total in cash		747,339,585	100.00%

### Scope decided by the MSG

The MSG decided to include all the non-tax revenue streams in the scope of the 2017-2018 EITI reports without applying a materiality threshold.

Based on the above, the Pearl payment flows to be included in the 2017-2018 reconciliation scope may be summarised as follows:

N°	Payment flows	In Cash	In kind
1	Royalty (Seeding Tax)	X	
2	Lease of Building	X	
3	Other Fees (Registration & Annual Fees)	X	
4	License Fee	X	
5	Production split 25% in kind (Foreign companies only)		X

## 4.2.7. Definition of the payments flows

Based on the selection criteria presented in the previous section, the following payment flows were selected in the scope.

### Common taxation

Table 105 : Definition of the Payment flows included in the scope

N°	Payment flows	Definition
<b>Payments to IRD and Customs Department</b>		
1	Corporate Income Tax (CIT)	For the company that is registered and established in Myanmar under the Myanmar Companies Act or the Special Companies Act 1950, the other income except the salary heading of the non-resident foreigner, the business that operates with the permission issued by the Myanmar Investment Commission, State Owned economic organizations, the income tax is 25 % of net profit.
2	Commercial Tax	Commercial tax is levied on the sales of goods and services and applies to certain transactions as defined in the Commercial Tax Law. Commercial tax is applied to the gross sales of goods and services. For imported goods, commercial tax is calculated on the "cost, insurance and freight" (CIF) value of goods plus customs duties. The commercial tax levied on the export of electricity is at a rate of 8% and crude oil at a rate of 5%. Commercial tax is at zero percent on exports, except in the case of exported electricity and crude oil. The application for registration must be in the prescribed form and filed one month before the commencement of business.
3	Specific good Tax	Specific Goods Tax is payable on goods that are imported goods, manufacturing goods that are produced in the domestic market and exported goods. There are 17 specific goods with tax rates from 5% to 80%. The specified tax rates on the specific goods: <ul style="list-style-type: none"> <li>Natural gas: 8%</li> <li>Raw jade: 15%</li> <li>Raw ruby, sapphire and precious stones: 10%</li> <li>Finished products of jade, ruby, sapphire and other precious stones Jewellery made by finished products of jade, ruby, sapphire, and other precious stones : 5%</li> <li>The exported log and different type of timber : 10%</li> </ul> All exports are exempt from commercial tax with the exception of specific goods.
4	Stamp Duties	Stamp duties collected from the sale of judicial and non-judicial stamps. Judicial stamps represent fees payable under the Court Fees Act. Non-judicial stamp duty is levied on various types of instruments required to be stamped under the Myanmar Stamp Act.
5	Capital Gains Tax	The sale, exchange or transfer of capital assets are levied for income tax purposes on gains calculated based on the difference between <b>gross sales</b> and the <b>purchase cost of assets plus any additions less depreciation</b> . Capital assets for income tax purposes are defined as lands, buildings, vehicles, or any other asset owned by an entity including shares, bonds and intangibles. CGT is levied at <b>10%</b> on the capital gain and payments are required to be made within thirty days from the date of disposal of the capital assets.
6	Withholding tax	Withholding tax (WHT) is a tax where any person or company making certain payments is required to deduct from such payments and remit to the Government Agencies. The tax withheld must be paid to IRD within seven days from the date of withholding. Tax withheld from payments to residents will be set off against the tax due on their final tax assessments. Tax withheld from payments to non-resident companies (except the branches registered in Myanmar) is a final tax. <u><b>Latest updates:</b></u> <b>Notification 51/2017 dated on 22 May 2017</b> WHT does not apply to payments in local currency of less than MMK 500,000 within a financial year. WHT does not apply to payments among Government organisations, SEE or interest payments made to branches of foreign banks.  <b>Notification 47/2018 dated on 18 June 2018</b> Notification N° 41/2017 has been replaced by Notification N° 47/2018 starting from 1 July 2018.

N°	Payment flows	Definition
		The main change is the removal of withholding tax on payments for goods and services to residents. However, payments made by the Government are still subject to a 2% withholding tax.  In the new notification, for payment made by the government under paragraph (c) of the withholding tax rates table below, MoPF states the payment exemption threshold of MMK 1 million in a year. It is also stated that no withholding tax is required for payments made between Government Agencies.
7	Other significant payments (> 50,000 USD)	To avoid material omissions, a line entitled "Other significant payments flows" has been included in the reporting template for extractive companies to report any significant payments including any payment flows which are not expected in the reporting template and which are above USD 50,000.
<b>Payments to Customs Department</b>		
1	Commercial Tax	A commercial tax is levied on the sales of goods and services and applies to certain transactions as defined in the Commercial Tax Law. Commercial tax is applied to the gross sales of goods and services. For imported goods, commercial tax is calculated via the "cost, insurance and freight" (CIF) value of goods.
2	Customs Duties	Goods imported in Myanmar are subject to Customs Duties and are required to be declared to the Myanmar Customs Department accordingly.  Currently, the Customs Duties levied on the import of goods generally range from 0% to 40% of the value of the goods.  For exports of goods, export duty is levied on certain commodities.

## Oil and Gas payments

### Payment flows in kind

**Table 105 : Definition of the Payment flows included in the scope**

N°	Payment flows	Definition
<b>Payments to MOGE</b>		
1	State production entitlement	It is the State's entitlement to the Profit Oil/Gas of the Oil and Gas produced.
2	MOGE production entitlement	It is MOGE's entitlement on the Profit Oil/Gas and Cost Oil/Gas of the Oil and Gas produced. All three of the Standard PSCs used by EPD contain state buy-in provisions. For onshore blocks, the standard PSC reserves a 15% undivided interest for MOGE, with the option for the state to increase their share up to a 25% undivided interest in the project. For offshore blocks, MOGE has the right to buy-in to the project up to 20% upon a commercial discovery (increasing to 25% if the reserves are greater than 5 TCF).
3	Royalties	Royalties are charged at the percentage (mentioned in the contract) of the value of production. The same rate applies for both oil and natural gas. Royalties in Myanmar could be paid in kind or in cash (PSC in cash and IPR in kind).
4	Baseline payment	In-kind payment made by Oil and Gas onshore companies to MOGE. The amount and payment modalities are detailed in the PCC (Performance Compensation Contracts) and IPR (Improved Petroleum Recovery Contract)..
5	Risk compensation	In-kind payment made by Oil and Gas onshore companies to MOGE. The amount and payment modalities are detailed in the PCC (Performance Compensation) Contracts and IPR (Improved Petroleum Recovery Contract).

### Payment flows in cash

**Table 105 : Definition of the Payment flows included in the scope**

N°	Payment flows	Definition
<b>Payments to MOGE</b>		
7	Signature Bonus	Bonus paid upon conclusion of a (Production Sharing Contract (PSC). The amount of the Signature Bonus is specified in the PSC.
8	Royalties	Royalties are charged at the percentage (mentioned in the contract) of the value of production. The same rate applies for both oil and natural gas. Royalties in Myanmar could be paid in kind or in cash (PSC in cash and IPR in kind).
9	Production Split (State share)	It is the State's entitlement on the Profit Oil/Gas of the Oil and Gas produced. Production of petroleum net of cost is shared between PSC parties, based on a progressive sliding scale linked to average daily production levels from the production area. The rates are distinct for oil and for natural gases.
10	Production Bonus	Bonus paid to MOGE in proportion to the quantities of hydrocarbons produced. The amount of the Production Bonus is specified in the PSC.

N°	Payment flows	Definition
11	MOGE share (Profit and Cost)	It is MOGE's entitlement on the Profit Oil/Gas and Cost Oil/Gas of the Oil and Gas produced. All three of the Standard PSCs used by EPD contain state buy-in provisions. For onshore blocks, the standard PSC reserves a 15% undivided interest for MOGE, with the option for the state to increase its share up to a 25% undivided interest in the project. For offshore blocks, MOGE has the right to buy-in to the project up to 20% upon commercial discovery (increasing to 25% if the reserves are greater than 5 TCF).
12	Dividend	This is the distribution of profits in proportion to the number of shares held directly in the Extractive Company.
13	Training Fund	A training contribution is payable annually by concession holders. Different annual payments apply during the exploration and production periods. The payments to the training fund are not transferred to MOGE, they are held by the extractive companies and managed by a monitoring committee of which MOGE is a member.
14	Research and Development Fund	Contractors should pay an annual contribution to a Research and Development (R&D) Fund from the start of production. This contribution is equal to 0.5% of contractor's share of profit production.
16	Data fee	Data fee is levied only on offshore blocks. It is payable within 30 days after the signature of the PSC.
17	Land fees/Dead rent fee	Land fees is payable to the Ministry of Environmental Conservation and Forestry. The amount of the land rent is specified in the PSC
18	Other significant payments (> 50,000 USD)	To avoid material omissions, a line entitled "Other significant payments flows" has been included in the reporting template for extractive companies to report any significant payments including any payment flows which are not expected in the reporting template and which are above USD 50,000.
19	Contribution to the State/region social development fund	It is the annual contribution made by Oil and Gas companies to the State/region social development fund.

## Oil and Gas transportation payments

Table 105 : Definition of the Payment flows included in the scope

N°	Payment flows	Definition
<b>Payments to MOGE</b>		
1	Profit Sharing Oil and Gas transportation	It is MOGE's share of the Oil and Gas transported via the pipeline.
2	Transit fees Oil and Gas transportation	Transit fees are paid by extractives companies to MOGE for the use of the pipelines.
3	Road right fee Oil and Gas transportation	Road right fees are paid to MOGE by the companies which operate the pipelines.

## Mining sector payments

### Payment flows in kind

Table 105 : Definition of the Payment flows included in the scope

N°	Payment flows	Definition
<b>Payments to MoM</b>		
1	Production Split	Production is shared between the parties. The percentage of the SOE and the percentage of each partner are mentioned in the PSC. The Ministry of Mines share can be increased if production increases.
2	Royalties	Royalties are paid by a mining licence holder to SOEs on the sales value of all products extracted. Royalties for Mining Projects are payable on: -Precious metallic minerals from 5% to 7.5% -Iron, copper, zinc, lead, etc. from 3% to 4%; and gold, silver, platinum from 4% to 5%.

## Cash payment

**Table 105 : Definition of the Payment flows included in the scope**

N°	Payment flows	Definition
<b>Payments to Ministry of Mines Department of Mines N°1 Mining Enterprise (ME1) N°2 Mining Enterprise (ME2)</b>		
1	Royalties	Royalties are paid by a mining licence holder to SOEs on the sales value of all products extracted. Royalties for Mining Projects are payable on: -Precious metallic minerals from 5% to 7.5% -Iron, copper, zinc, lead, etc. from 3% to 4%; and -Gold, silver, platinum from 4% to 5%.
2	Signature Bonus	Bonus paid within 30 days after conclusion of mining agreement. The amount of the Signature Bonus is specified in the agreement.
3	Production Split	Production is shared between the parties. The percentages payable to the SOE and to each partner are mentioned in the PSC. The Ministry of Mines' share can be increased if production increases.
4	Dead Rent Fees	Land rent also called "dead rent" is payable during mineral prospecting and exploration stages. The amount of the land rent is specified by the mining agreement.
5	Licence Fees	Fees payable by an applicant of mining rights to be granted a mining license or permit.
6	Application Fees	Fees payable by an applicant for a mining right
7	Dividend	This is the distribution of profits in proportion to the number of shares held directly in the Extractive Company.
8	Other significant payments (> 50,000 USD)	To avoid material omissions, a line entitled "Other significant payments flows" has been included in the reporting template for extractive companies to report any significant payments including any payment flows which are not expected in the reporting templates and which are above USD 50,000.
<b>Payments to MGE</b>		
9	Royalties (20%)	Royalties are levied on the Gems and Jade sales production at the rate of 20% These royalties are paid to MGE.
10	Royalties (10%)	Royalties are levied on the Gems and Jade sales in the annual emporium at the rate of 10%. Royalties are split between IRD (7%) and MGE (3%).
11	Sale Split	It is the share of the State on the revenues of Gems & Jade sales made in the annual emporium.
12	Emporium Fees / Sale Fees	These fees are payable by the participants at the Gems and Jade Emporium.
13	Commercial Tax	A commercial tax is levied on the sales of goods and services and applies to certain transactions as defined in the Commercial Tax Law.
14	Permit Fee	Permit fees are payable by the holders of Gems and Jade rights
15	Service Fees	Service fees are payables by the participants to the Emporium at the rate of 3% for the raw materials and 1% for the values added products
16	Incentives	These fees are payable at the rate of 1% or 2% only by Joint Venture partners.
N°	Payment flows	Definition
<b>Payments to Forest Department -Ministry of Environmental Conservation and Forestry</b>		
13	Land rental fees	Land rent also called "dead rent" is payable on mineral prospecting and exploration stages. The amount of the land rent is specified by the mining agreement.
14	Environmental / Plantation fees	Environmental / Plantation fees is payable by mining companies when they obtain their mining licenses.
<b>Payments General Administration Department-Ministry of Home Affairs</b>		
15	Mineral taxes	This includes 'fees from licenses for the extraction of minerals such as stone, laterite, limestone, marble, gypsum, clay, or other minerals which are not under the special mining rule.' In some cases, there is a fee per mill or rent per acre; in other cases, as with marble, GAD receives a certain number of kyat per 100 cubic feet extracted.
<b>Payments to States/Regions</b>		
16	Contribution to the State/region social development fund	It is the annual contribution made by companies to the State/region social development fund.



## Social payments

The private sector's contribution to good governance in the extractive industries sector typically comes through either individual projects (which can be classed, in EITI terms, as "social payments"), as Corporate Social Responsibility (CSR) programmes, or in a more structured form as Community Development Agreements which are incorporated into legal contracts between the operator and the government.

Under the EITI 2016 Standard, all forms of social payments must be recorded in the annual EITI reports, whether these social payments are mandated by law or included within the contract.

We understand that in Myanmar there are no social payments mandated by law, but social expenditure made voluntarily through CSR programmes which are implemented in accordance with company policies. We refer to two major CSR programmes, for the Yadana (Socio-Economic Programme (SEP)) and Shwe Gas pipelines. We also understand that some companies could be contractually obligated to contribute to the local CSR spending.

We cannot confirm whether companies have contractual obligations to make social payments since we could not consult these contracts

We understand that CSR has been established at the level of MOGE. 2% of the Net Profit of MOGE will be allocated to this fund.

MEITI may wish to play a role in ensuring greater transparency and accountability in these programmes by requiring detailed reporting on social expenditure for all companies that will be selected in the scope. The selected companies will be required to provide details of the projects and the beneficiaries of such expenditure.

N°	Flux	Definition
1	Mandatory social payments	<p>These flows relate to mandatory social payments made by extractive companies in the development of local communities under agreements and contracts or commitments to communities and local councils.</p> <p>These include payments made by extractive companies to finance health infrastructure projects, schools, roads, truck farming and those supporting the actions of local communities, compensation other than those granted in return for direct compensations.</p>
2	Voluntary social expenditures	<p>These flows relate to voluntary social payments made by extractive companies in the development of local communities under agreements and contracts or commitments to communities and local councils.</p> <p>These include payments made by extractive companies to finance health infrastructure projects, schools, roads, truck farming and those supporting the actions of local communities, compensation other than those granted in return for direct compensations.</p>

## 4.3. List of reporting entities decided by the MSG

### 4.3.1. Approach for the selection of reporting entities for inclusion in the reconciliation scope

We understand that extractive revenues are collected by MONREC and MoEE for the specific payments while MoPF collects common taxation. We also understand that tax revenues received by MoPF from the mining sector may relate to activities other than mining operations as mining companies are allowed to operate in several sectors according to Myanmar regulations.

The Customs Department within MoPF is responsible for the collection of Customs Duties. Commercial tax and Specific Good Tax are collected by the MCD for IRD.

Therefore, the materiality analysis was based on the statements of revenues provided by the SOEs, MONREC, IRD and the Customs Department for the fiscal years 2017-2018.

### 4.3.2. List of reporting entities decided by the MSG for 2017-2018 EITI report

#### a. Oil and Gas sector

##### Materiality analysis

According to the data provided by MOGE and OGD, payments made by the Oil and Gas companies for the FY 2017-2018 are set out in the table below:

In billion kyats								
Company	Project	Land Fee	Royalties in cash	Royalties in kind	State's Share	Total in cash	Cumulative	%
Total E & P Myanmar (Yangon Branch) Co.,Ltd	Yadana Project	1.36	104.09	-	261.74	367.19	367.19	31%
Daewoo International Corporation	Shwe Project	-	91.38	-	216.02	352.91	720.1	30%
PCML	Yetagun Project	-	54.67	-	214.32	314.88	1034.98	27%
PTTEP Ltd	Zawtika Project	-	56.65	-	15.25	131.63	1166.61	11%
Goldpetrol JOC Inc	Chauk and YNG	-	2.01	43,451.48	-	2.01	1168.62	0%
<b>Total</b>		<b>1.36</b>	<b>308.79</b>	<b>43,451.48</b>	<b>707.33</b>	<b>1168.62</b>		

Moreover, according to the data submitted by MOGE, Signature Bonuses of USD 44.08 million were paid in the FY 2017-2018 in addition to the payments in the table above. The breakdown by company and by block is detailed as follows:

In billion kyats			
Company	Date	Block	Amount paid
Woodside Energy (Myanmar)Pte.Ltd (Yangon Branch)	7-2-2018	Block A-7	31.28
Petronas Carigali Myanmar Inc (Branch Office)	12-5-2017	IOR-7	4.04
Total E & P Myanmar (Yangon Branch) Co.,Ltd	7-11-2017	Block M5-M6	2.03
Unocal Myanmar Offshore Co.,Ltd (Yangon Branch)	24-11-2017	Block A-5	1.35
Berlanga Myanmar Pte.Ltd (Myanmar Branch)	12-10-2017	Block M-8	1.35
Total E & P Myanmar (Yangon Branch) Co.,Ltd	9-11-2017	Block YWB	1.35
ENI Myanmar B.V(Myanmar Branch)	13-3-2018	Block MD-4	1.34
CFG Energy Pte(Myanmar Branch)	27-10-2017	Block M-8	0.68
CFG Energy Pte(Myanmar Branch)	26-7-2017	Block M-15	0.67
<b>Total</b>			<b>44.08</b>

According to the data provided by IRD, the following payments were made by the oil and gas companies during the FY 2017-2018:

In billion kyats				
Company	Commercial Tax	Income Tax	Withholding Tax	Total
Berlanga Myanmar Pte Ltd., (Myanmar Branch)	-	-	0.03	0.03
CAOG PTE LTD (MYANMAR BRANCH)	-	-	0	0
Gail JJ India Ltd	-	0.5	-	0.5
Gold Petrol Joint Operating Company Inc., (GJOC Inc.)	0.63	-	-	0.63
Nippon Oil Exploration (Myanmar) Ltd	-	4.31	-	4.31
ONGC Videsh Ltd.,	0.04	-	0	0.04
PC Myanmar (Hong Kong) Limited	16.11	-	-	16.11

Company	Commercial Tax	Income Tax	Withholding Tax	Total
Petronas Carigali Myanmar Inc (PCMI)	1.91	-	-	1.91
Posco Daewoo Corporation (Myanmar E&P Office)	0.83	-	1.49	2.32
PTTEP International Ltd.	26.56	16.84	0.04	43.44
Statoil Myanmar Pte. Ltd	0.04	-	-	0.04
Total E&P Myanmar	5.1	-	-	5.1
Unocal Myanmar Offshore Co., Ltd.	-	15.95	-	15.95
Woodside Energy (Myanmar) Pte Ltd	6.11	-	-	6.11
<b>Grand Total</b>	<b>57.32</b>	<b>37.6</b>	<b>1.56</b>	<b>96.48</b>

### Scope decided by the MSG

the MSG decided to include the 56 companies' oil and gas companies holding Oil and Gas licenses as an operator, partner in the production field or Operators with Blocks in the Study and Exploration Phases. The list of selected companies is detailed below:

**Table 106: List of Oil and Gas companies selected in the scope**

Type	N°	Company
State Owned Enterprise	1	Myanma Oil and Gas Enterprise
Operator in producing field	2	Gold Petrol Joint Operating Company Inc., (GJOC Inc.)
	3	MPRL E&P Pte Ltd. (Yangon Branch)
	4	PC Myanmar (Hong Kong) Limited
	5	Posco Daewoo Corporation (Myanmar E&P Office)
	6	PTTEP International Ltd.
	7	Total E&P Myanmar
Partner in the producing field	8	Gail JJ India Ltd
	9	Korea Gas Corporation
	10	Nippon Oil Exploration (Myanmar) Ltd
	11	ONGC Videsh Ltd.,
	12	Unocal Myanmar Offshore Co., Ltd.
Operators with Blocks in the Study and Exploration Phases	13	Asia Orient International Ltd. (CJs Oc Nobel Oil)
	14	Bashneft International B.V. (Myanmar Branch)
	15	Berlanga Myanmar Pte Ltd., (Myanmar Branch)
	16	BG Exploration & Production Myanmar Pte. Ltd. (Myanmar Branch)
	17	Brunei National Petroleum Company Sdn Bhd (PB Myanmar)
	18	CAOG PTE LTD (MYANMAR BRANCH)
	19	CFG Energy Pte Ltd.,
	20	ENI Myanmar B.V. (Myanmar Branch)
	21	IsTech Energy EP-5 Pte Ltd., (Myanmar Branch)
	22	Jubilant Oil & Gas Pte. Ltd.
	23	North Petro-Chem Corporation Myanmar Ltd. (NPCMM)
	24	Ophir Myanmar (Block AD-3) Limited (Myanmar Branch)
	25	Pacific Hunt Energy Corporation (Myanmar Branch)
	26	Parami Energy Development Company Ltd

Type	N°	Company
	27	Apex Geo Services Co.,
	28	Petronas Carigali Myanmar Inc (PCMI)
	29	Petrovietnam Exploration Production Corporation
	30	Reliance Industries Ltd.
	31	Shell Myanmar Energy Pte. Ltd. - Yangon Branch
	32	SNOG Pte Ltd
	33	Tap Energy (M-7) Co., Ltd. (Statoil)
	34	TRG M15 Pte. Ltd.
	35	Woodside Energy (Myanmar) Pte Ltd
	36	MOECO Asia Pte. Ltd
	37	SmartE&PInternational Co.,Ltd
	38	United National Resources Development Services Co., Ltd
	39	Century Bright Gold Co., Ltd
	40	Myanmar Petroleum Exploration & Production Co., Ltd.
	41	Royal Marine Engineering Co.,Ltd
	42	Eden Group Co., Ltd
	43	Maurel & Prom Exploration & Production
	44	CNPC International Ltd.
	45	Asia Petroleum Investment Company (APIC)
	46	UPR Pte Ltd.
	47	A-1 Mining Company.Ltd.
	48	Win Precious Resources Pte Ltd.
	49	Palang Sophon Offshore Pte. Ltd. (PSO)
	50	Smart Technical Services Ltd.
	51	Lister Services Co., Ltd.
	52	Machinery and Solutions Co., Ltd.
	53	Sun Apex Holdings Ltd.
	54	Young Investment Group Co. Ltd.
	55	IGE Pte. Ltd.
	56	UNOG Pte. Ltd.

## b. Transportation of Oil and Gas

### Materiality analysis

#### Specific payments and taxes

According to the data provided by MOGE, we identified the following payments related to the transportation of Oil and Gas sector:

Company	Project	In billion kyats Road right fee Oil and Gas transportation
South East Asia Gas Pipeline Co., Ltd (Great Ocean Branch) SEAGP	Shwe	9.20
Southeast Asia Crude Oil Pipeline (SEAOP)	NC	0.39
Andaman Transportation Limited (Yangon Branch) (ATL)	NC	1.02
<b>Total</b>		<b>10.61</b>

The documentation provided by MOGE shows an additional right of way payment amounting 0.7 billion kyats related to the Yetagan offshore project. We were unable to identify the transportation company that made this payment.

## Common law tax and payments

According to the data provided by IRD, the following payments were made by Oil and Gas transportation companies:

No	Company	In billion kyats		
		Commercial Tax	Income Tax	Total
1	Moattama Gas Transportation Co.,Ltd (MGTC)	-	131.31	131.31
2	South East Asia Gas Pipeline Co.,Ltd (Great Ocean Branch) SEAGP	0.73	-	0.73
3	Taninthayi Pipeline Company LLC (Myanmar Branch)	-	53.38	53.38
<b>Total</b>		<b>0.73</b>	<b>184.68</b>	<b>185.42</b>

Following the data provided by the Customs Department, we did not come across any payment made by Oil and Gas transportation companies.

### Scope decided by the MSG

Given the limited number of operators, the MSG decided to include all the entities without applying a materiality threshold. On this basis, five oil and gas transportation companies will be included in the reconciliation scope. Those companies are presented as follows:

**Table 107: List of Transportation companies selected in the scope**

Company	Scope 2017-18	Scope 2016-17
South East Asia Gas Pipeline Co.,Ltd (Great Ocean Branch) (SEAGP)	☐	☐
Southeast Asia Crude Oil Pipeline (SEAOP)	☐	☐
Andaman Transportation Limited (Yangon Branch) (ATL)	☐	☐
Moattama Gas Transportation Co.,Ltd (MGTC)	☐	☐
Taninthayi Pipeline Company LLC (Myanmar Branch) (TPC)	☐	☐

## c. Gems and Jade sector

### Materiality analysis

The statements of revenues obtained from MONREC do not include the registration number of the companies. The names of some companies have been spelt differently from one government agency to another. These differences may be also due to the translation of these statements from Myanmar to English. Therefore, it would be erroneous to compile these data using company names as minor errors in these names may affect the accuracy of the materiality analysis.

Due to these constraints, the analysis of the materiality threshold has been done separately for each Government Agency without compiling all the data.

The payments made by Gems and Jade companies were collected from MONREC, IRD, Customs Department and the Forestry Department. Details of these payments by Government Agency are as follows:

Government agency	In billion kyats	
	Amount	%
Ministry of Natural Resources and Environmental Conservation MONREC	741.063	86%
Inland Revenue Department IRD	115.397	13%
Myanmar Customs Department MCD	4.342	1%
Forestry Department FD	0.003	0%
<b>Total</b>	<b>860.80</b>	<b>100%</b>

Due to same limitations mentioned for the 2017-2018 data, the materiality has been analysed for each Government Agency separately without compiling all the data.

## Materiality analysis of the MONREC data

Based on the data provided by MONREC, the profile of payments for Gems and Jade sector in FY 2017-2018 is set out in the following table:

Gems and Jade Companies/Taxpayers				
Payment threshold	Number of companies/ taxpayers	Revenue collected by MoM (billion Kyats)	Weight / total collected revenue	Cumulative weight
Amount > Kyats 10 billion	7	147.59	20%	20%
Kyats 5 billion <Amount <Kyats 10 billion	23	151.94	21%	40%
Kyats 3 billion <Amount <Kyats 5 billion	27	102.82	14%	54%
Kyats 2 billion <Amount <Kyats 3 billion	28	67.90	9%	63%
Kyats 1.5 billion <Amount <Kyats 2 billion	29	50.58	7%	70%
Kyats 1 billion <Amount <Kyats 1.5 billion	41	51.69	7%	77%
Kyats 0.84 billion <Amount <Kyats 1 billion	23	20.68	3%	80%
Amount < Kyats 0.84 billion	2,431	147.87	20%	100%
<b>Total</b>	<b>2,609</b>	<b>741.06</b>	<b>100%</b>	

According to the above table, the companies paying taxes of more than **Kyats 0.84 bn** represent **80%** of the total revenues collected by MONREC from companies operating in the Gems and Jade sector.

The materiality threshold above means that Gems and Jade companies making **80%** of reported payments to MONREC will be included in the reconciliation i.e. all companies making payments to MONREC in excess of **0.84 bn Kyats**.

Accordingly, the MSG decided to select 178 companies for the reconciliation exercise on the basis of the data obtained from MONREC as follows:

**Table 108: List of Gems and Jade companies selected in the scope**

Gems and Jade companies proposed for the reconciliation scope 2017-2018			
N°	Company name	N°	Company name
1	Linn Lett Win Yadanar Gems Co Ltd	90	Nay La Pwint
2	Yar Za Htar Ni	91	Ma Li Kha Gemstone Co
3	YADANAR TAUNG TEN	92	Wan Full
4	Wai Aung Gabar	93	Aung Tu Ka Dana
5	Ayeyar Yadanar Gems & Jewellery Co., Ltd	94	Yadanar Moe Myay
6	A K N K	95	Shine Family
7	SILVER ELEPHANT GEMS CO LTD	96	Thein Gabar Aung
8	Phyo Thiha Kyaw	97	Jade Treasure
9	Same Wai Hlaing (SWH)	98	Lawka Nandar
10	Mya Garden (GEG)	99	Ngwe Si Hein
11	Kan Pwint Oo	100	Myat Pan Khaing
12	Shwe Ngar Koe Kaung	101	Lon Hine
13	Shwe Gaung Gaung Gems Co Ltd	102	Shwe Yaung Sin
14	Htun Tauk Zabu Gems & Jewellery Co;Ltd.	103	Hein Aung Lin Htet Jade Co. Ltd
15	Sein Lon Taung Tan (SLTT-S)	104	Phar Kant Sai Bon
16	Ayar Jade	105	Thigi Myintzu Yadanar
17	Shining Star Light Gems & Jewellery Co.,Ltd	106	Same Nay Chi (SNC)

Gems and Jade companies proposed for the reconciliation scope 2017-2018			
N°	Company name	N°	Company name
18	Yadanar Sin Thiri Gems Co	107	Seine Light
19	SHWE OAK KHAI MINING CO., LTD.	108	New Lucky Green Gems
20	Jade Mountain	109	Mya San Dar (MSD)
21	Thi Yaw Ma Ni	110	Jade Thazin
22	Phoe Thar Htoo	111	Kaung Su Aung
23	Myanma Seinn Lei Aung Gems Co Ltd.	112	Kachin National Development
24	Yadanar Young Chi	113	Kyaut Seinn Tapyay
25	Lin Htet Aung	114	Kaung Wai Yan Co
26	Norbal Three Star (GMMK)	115	Seine Sein
27	WAN BROTHERS	116	Lucky Star Jade Group
28	Mya Young Tun	117	Yadanar Si
29	Nan Htike Pyae Paing Co	118	Ah Mhan Akhan Kyauk Seinn
30	Khun Paooe	119	Yadanar Thayaphu
31	Shwe Tataing	120	Kaung Mon Yadanar
32	Great Genesis Gems (GMH)	121	Seine Young Myay
33	Htat Aye Yar	122	Global Sun Light
34	Wai Family	123	Aung Hlaing Kyawlwa
35	Sai Taung Co	124	Ah Phoe Tan San Chain Mhe
36	KYAUK SEINN NANDAW GEMS & JEWELLERY Co Ltd	125	Seine Aung
37	Jade Land	126	Myint Shinn
38	Jade Than Lwin	127	U Kyaw Thet
39	1 1 1	128	Buu Gar
40	Kaung Myat Thu Ka	129	Jade Shae Saung
41	Seine Pwint Pwint Wai	130	Jade Min
42	Khine Myanmar	131	Yi Li Fa [YLF]
43	Unity	132	Pyi Yadanar
44	Wai Yan Thar (WYT)	133	Tharyar Kyinu Phwe
45	Sin Gaung Taung	134	Myanmar Thura [MTY]
46	GREEN MOUNTAIN CO; LTD	135	Kyaut Seinnn Karbarkyaw
47	Chang Long Gems & Jewellery Co Ltd	136	Hole In One
48	Kyaut Myat Min	137	Nay Chi Yadanar
49	Yadanar Shwe Ye Win	138	Kyauk Same Win Kabar
50	Myit Sone Ayar	139	Oo Ru Seine Yadanar
51	Yadanar Aung Chan	140	Kaung Htike
52	Myanmar Imperial Jade Co	141	Sein Minn Yadanar
53	Khin Zaw Aung & Brother	142	Yadanar Kyal Ngar Pwint
54	Myanmar First Gems & Jewellery Co Ltd	143	Kyal Lin
55	Ever Winner [EW]	144	Ngwe Young Stone
56	Shwe Hein Htet Gems Co Ltd	145	Wan Chan
57	Myo Nwe Gems	146	Khine Lon
58	Tun Naing Aung	147	Pon Taung Thar
59	Nay Min Kabar Co	148	Palaung National
60	Zabu Thiri Co	149	Yadanar Linn
61	Yadanar Three Elephants Co	150	Yadanar Kyar Phyu



Gems and Jade companies proposed for the reconciliation scope 2017-2018			
N°	Company name	N°	Company name
62	Kyaing International (GKI)	151	Sein Thura San
63	Nan Oo Yadanar	152	Aung Shwe Kabar
64	Su Htoo Pan	153	San Taw Win
65	Long Byit	154	Jade Crystal Palace
66	Super Sein	155	Shwe Hwa
67	Win le' Yadanar	156	Aung Myin Thu
68	Kyal Sin Phyu	157	Gold Jade
69	Yadanar kyal	158	Thet Hein
70	ARS Gems [ARS]	159	Myanmar Kywal Wa Thaw Myay
71	Yadanar Pyae Phyo Aung	160	MEGA STAR JEWEL LIMITED
72	Jade Padathar Gems Co,Ltd	161	Kan Sein Pwint
73	Ruby Dragon Company	162	Myanmar Winning Gate (GMWG)
74	Northern Jade World	163	San Family
75	Kaung Htet Khaing	164	Hone Yin Yi Shin
76	Kaung Swan Htet Co	165	Kyal Ta Khon Sein
77	Shwe Ywat Hlwar	166	Gandawin Kyaut Myat Garden
78	Same Lei Yadanar Win Co (SLYW)	167	Kaung Taw Myay
79	Phar kant Bayin	168	U Hla Soe Oo
80	Agga Yadanar	169	80000
81	Shwe War Myae (mandalay)	170	Than Lwin Kyaw Kyar
82	Delta Land	171	Gems Shwe Pyi Co
83	Seine Lone Aung	172	Moe Brothers
84	Aung Hein Minn	173	Innwa Nay Chi Co
85	Kyauk Seinn Sun Shwin Jade Gems & Jewellery Co Ltd	174	Jade Master
86	Yadanar Aung Tun Tauk	175	Taw Win Jade Dragon
87	U YA GEMS	176	Shwe Tun Win
88	Chaung Brother	177	Kan Thar Yar
89	Myat Yamon	178	Jade Brothers

### Materiality analysis of IRD data

Based on the data provided by IRD, payments for Gems and Jade sector in the FY 2017-2018 are set out in the following table:

Gems and Jade Companies/Taxpayers				
Payment threshold	Number of companies/ taxpayers	Revenue collected by IRD (billion Kyats)	Weight / total collected revenue	Cumulative weight
Amount > Kyats 3 billion	8	60.74	53%	53%
Kyats 2 billion <Amount <Kyats 3 billion	7	16.38	14%	67%
Kyats 1 billion <Amount <Kyats 2 billion	8	10.29	9%	76%
Kyats 0.5 billion <Amount <Kyats 1 billion	13	8.66	8%	83%
Amount < Kyats 0.5 billion	411	19.33	17%	100%
<b>Total</b>	<b>447</b>	<b>48.14</b>	<b>100%</b>	

Accordingly, the companies paying taxes of more than **0.5 bn Kyats** represent **83%** of the total revenue collected by IRD from companies operating in the Gems and Jade sector.

The materiality threshold decided by the MSG above means that Gems and Jade companies making **83%** of reported payments to IRD will be included in the reconciliation i.e. all companies making payments to IRD in excess of **0.5 bn Kyats**.

Accordingly, 36 companies will be selected for the reconciliation exercise on the basis of the data obtained from IRD as follows:

**Table 109: List of additional Gems and Jade companies selected in the scope**

Gems and Jade companies proposed for the reconciliation scope 2017-2018	
Linn Lett Win Yadanar Gems Co.,Ltd *	Kyauk Seinn Sun Shwin Jade Gems & Jewellery Co.;Ltd*
Yar Zar Htar ne Gems Co.,Ltd *	Khin Zaw Aung & Brothers Gems & Jewellery Co.,Ltd *
Myat Myittar Mon (G & J) Co.,Ltd	Shining Star Light Gems & Jewellery Co.,Ltd*
Yadanar Taung Tann Gems Co.,Ltd *	Nay Min Kabar Jade & Gems Co.,Ltd *
Wai Aung Gabar Gems Company Limited *	Shwe Gaung Gaung Gems Co.,Ltd *
Kan Pwint Oo Gems & Jewellery Co.,Ltd *	Shwe Hein Htet Gems Co.,Ltd*
Myanmar Imperial Jade Co.,Ltd *	Pang Huke Duwa Co.,Ltd
AUNG HEIN MIN CO., LTD *	Great Genesis Gems Co.,Ltd *
Silver Elephant Gems Co.,Ltd *	Agga Yadanar Jade, Gems & Jewellery Co.,Ltd *
Ayar Jade Co.,Ltd *	Phyo Thiha Kyaw Gems Co.,Ltd *
Myo Nwe Gems & Jewellery Co.,Ltd *	Nay La Pwint *
Unity Gems Co.,Ltd *	Kaung Swan Htet Co.,Ltd *
Kyaing Int'L Trading Co.,Ltd *	Shwe Pyi Thar Thama
Myanmar Thura Gems Co.,Ltd *	Kaung Su Aung Jade & Gems *
Sein Lom Taung Tan Gems Co.,Ltd *	Yadanar Yaung Chi Gems Co.,Ltd *
Thirawmani Gems & Jewellery Co.,Ltd *	Khant Shwe Pyi Co.,Ltd
Ayeyar Yadanar Gems & Jewellery Co.,Ltd *	Agga Yadanar Min Yarzar Jade Gems *
Thein Gabar Aung Co.,Ltd *	Aung Myin Thu Gems & Jewellery Co.,Ltd*

(\*) Company already selected on the basis of MONREC data

### Materiality analysis of Customs data

Based on the data provided by the Customs Department, payments received from the Gems and Jade sector in the FY 2017-2018 are set out in the following table:

Gems and Jade Companies/Taxpayers				
Payment threshold	Number of companies/ taxpayers	Revenue collected by Customs Department (billion Kyats)	Weight / total collected revenue	Cumulative weight
Amount > Kyats 1 billion	1	2.14	49%	49%
Kyats 0.5 billion <Amount <Kyats 1 billion	1	0.84	19%	69%
Kyats 70 million <Amount <Kyats 0.5 billion	7	0.93	21%	90%
Kyats 50 million <Amount <Kyats 70 million	3	0.18	4%	94%
Amount <Kyats 99 million	29	0.26	6%	97%
<b>Total</b>	<b>41</b>	<b>4.34</b>	<b>100%</b>	

Accordingly, the companies paying taxes of more than **70 million Kyats** represent **90%** of the total revenues collected by the Customs Department from companies operating in the Gems and Jade sector.

The materiality threshold decided by the MSG above means that mining companies making **90%** of reported payments to the Customs Department will be included in the reconciliation i.e. all companies making payments to the Customs Department in excess of **70 million Kyats**.

Accordingly, nine (9) companies will be selected for the reconciliation exercise on the basis of the data obtained from the Customs Department as follows:

Gems and Jade companies proposed for the reconciliation scope 2017-2018	
Kaung Swan Htet *	Yadanar San Shwin Gem
Nilar Yoma	Yadanar Moe Myay Gem *
Lyan Shan	Mega Star Jewel*
Yadanar Myat Noe Thwe Gem	111 (triple one) *
Kyi Wai Yan	

(\*) Company already selected on the basis of MONREC data

### Materiality analysis for the Forestry Department

Based on the data provided by the Forestry Department, payments for Gems and Jade sector in the FY 2017-2018 are set out in the following table:

Gems and Jade sector Companies/Taxpayers				
Payment threshold	Number of companies/ taxpayers	Revenue collected by Forest Department (million Kyats)	Weight / total collected revenue	Cumulative weight
Amount > Kyats 1 million	1	2.73	93%	93%
Amount < Kyats 1 million	4	0.20	7%	100%
<b>Total</b>	<b>5</b>	<b>2.93</b>	<b>100%</b>	

According to the above table, Hee Ya Gems paid land fees of **2,73 million Kyats** representing **93%** of the total revenues collected by the Forestry Department from companies operating in the Gems and Jade sector.

The materiality threshold decided by the MSG above means that Gems and Jade companies making **93%** of reported payments to the Forestry Department will be included in the reconciliation i.e. all companies making payments to the Customs Department in excess of **2,73 million Kyats**.

Hee Ya Gems will therefore be selected for the reconciliation exercise on the basis of the data obtained from the Forestry Department.

### Scope decided by the MSG

The materiality thresholds decided by the MSG above means that Gems and Jade companies making **80%** of reported payments to MONREC, IRD, Customs Department and Forestry Department will be included in the reconciliation scope.

Therefore, on the basis of the data obtained from MONREC, IRD, Customs Department and Forestry Department, 188 companies have been selected for the reconciliation exercise:

Table 110: List of G&amp;J companies selected in the scope

N°	Company name	N°	Company name
1	Linn Lett Win Yadanar Gems Co Ltd	95	Shine Family
2	Yar Za Htar Ni	96	Thein Gabar Aung
3	YADANAR TAUNG TEN	97	Jade Treasure
4	Wai Aung Gabar	98	Lawka Nandar
5	Ayeyar Yadanar Gems & Jewellery Co., Ltd	99	Ngwe Si Hein
6	A K N K	100	Myat Pan Khaing
7	SILVER ELEPHANT GEMS CO LTD	101	Lon Hine
8	Phyo Thiha Kyaw	102	Shwe Yaung Sin
9	Same Wai Hlaing (SWH)	103	Hein Aung Lin Htet Jade Co. Ltd
10	Mya Garden (GEG)	104	Phar Kant Sai Bon
11	Kan Pwint Oo	105	Thigi Myintzu Yadanar
12	Shwe Ngar Koe Kaung	106	Same Nay Chi (SNC)
13	Shwe Gaung Gaung Gems Co Ltd	107	Seine Light
14	Htun Tauk Zabu Gems & Jewellery Co;Ltd.	108	New Lucky Green Gems
15	Sein Lon Taung Tan (SLTT-S)	109	Mya San Dar (MSD)
16	Ayar Jade	110	Jade Thazin
17	Shining Star Light Gems & Jewellery Co.,Ltd	111	Kaung Su Aung
18	Yadanar Sin Thiri Gems Co	112	Kachin National Development
19	SHWE OAK KHAI MINING CO., LTD.	113	Kyaut Seinn Tapyay
20	Jade Mountain	114	Kaung Wai Yan Co
21	Thi Yaw Ma Ni	115	Seine Sein
22	Phoe Thar Htoo	116	Lucky Star Jade Group
23	Myanma Seinn Lei Aung Gems Co Ltd.	117	Yadanar Si
24	Yadanar Yaung Chi	118	Ah Mhan Akhan Kyauk Seinn
25	Lin Htet Aung	119	Yadanar Thayaphu
26	Norbal Three Star (GMMK)	120	Kaung Mon Yadanar
27	WAN BROTHERS	121	Seine Yaung Myay
28	Mya Yaung Tun	122	Global Sun Light
29	Nan Htike Pyae Paing Co	123	Aung Hlaing Kyawlwa
30	Khun Paooe	124	Ah Phoe Tan San Chain Mhe
31	Shwe Tataing	125	Seine Aung
32	Great Genesis Gems (GMH)	126	Myint Shinn
33	Htat Aye Yar	127	U Kyaw Thet
34	Wai Family	128	Buu Gar
35	Sai Taung Co	129	Jade Shae Saung
36	KYAUK SEINN NANDAW GEMS & JEWELLERY Co Ltd	130	Jade Min
37	Jade Land	131	Yi Li Fa [YLF]
38	Jade Than Lwin	132	Pyi Yadanar
39	1 1 1	133	Tharyar Kyinu Phwe
40	Kaung Myat Thu Ka	134	Myanmar Thura [MTY]
41	Seine Pwint Pwint Wai	135	Kyaut Seinnn Karbarkyaw
42	Khine Myanmar	136	Hole In One
43	Unity	137	Nay Chi Yadanar
44	Wai Yan Thar (WYT)	138	Kyauk Same Win Kabar

N°	Company name	N°	Company name
45	Sin Gaung Taung	139	Oo Ru Seine Yadanar
46	GREEN MOUNTAIN CO; LTD	140	Kaung Htike
47	Chang Long Gems & Jewellery Co Ltd	141	Sein Minn Yadanar
48	Kyaut Myat Min	142	Yadanar Kyal Ngar Pwint
49	Yadanar Shwe Ye Win	143	Kyal Lin
50	Myit Sone Ayar	144	Ngwe Young Stone
51	Yadanar Aung Chan	145	Wan Chan
52	Myanmar Imperial Jade Co	146	Khine Lon
53	Khin Zaw Aung & Brother	147	Pon Taung Thar
54	Myanmar First Gems & Jewellery Co Ltd	148	Palaung National
55	Ever Winner [EW]	149	Yadanar Linn
56	Shwe Hein Htet Gems Co Ltd	150	Yadanar Kyar Phyu
57	Myo Nwe Gems	151	Sein Thura San
58	Tun Naing Aung	152	Aung Shwe Kabar
59	Nay Min Kabar Co	153	San Taw Win
60	Zabu Thiri Co	154	Jade Crystal Palace
61	Yadanar Three Elephants Co	155	Shwe Hwa
62	Kyaing International (GKI)	156	Aung Myin Thu
63	Nan Oo Yadanar	157	Gold Jade
64	Su Htoo Pan	158	Thet Hein
65	Long Byit	159	Myanmar Kywal Wa Thaw Myay
66	Super Sein	160	MEGA STAR JEWEL LIMITED
67	Win le' Yadanar	161	Kan Sein Pwint
68	Kyal Sin Phyu	162	Myanmar Winning Gate (GMWG)
69	Yadanar kyal	163	San Family
70	ARS Gems [ARS]	164	Hone Yin Yi Shin
71	Yadanar Pyae Phyo Aung	165	Kyal Ta Khon Sein
72	Jade Padathar Gems Co,Ltd	166	Gandawin Kyaut Myat Garden
73	Ruby Dragon Company	167	Kaung Taw Myay
74	Northern Jade World	168	U Hla Soe Oo
75	Kaung Htet Khaing	169	80000
76	Kaung Swan Htet Co	170	Than Lwin Kyaw Kyar
77	Shwe Ywat Hlwar	171	Gems Shwe Pyi Co
78	Same Lei Yadanar Win Co (SLYW)	172	Moe Brothers
79	Phar kant Bayin	173	Innwa Nay Chi Co
80	Agga Yadanar	174	Jade Master
81	Shwe War Myae (mandalay)	175	Taw Win Jade Dragon
82	Delta Land	176	Shwe Tun Win
83	Seine Lone Aung	177	Kan Thar Yar
84	Aung Hein Minn	178	Jade Brothers
85	Kyauk Seinn Sun Shwin Jade Gems & Jewellery Co Ltd	179	Myat Myittar Mon (G & J) Co.,Ltd
86	Yadanar Aung Tun Tauk	180	Pang Huke Duwa Co.,Ltd
87	U YA GEMS	181	Shwe Pyi Thar Thama
88	Chaung Brother	182	Khant Shwe Pyi Co.,Ltd
89	Myat Yamon	183	Nilar Yoma

N°	Company name	N°	Company name
90	Nay La Pwint	184	Lyan Shan
91	Ma Li Kha GemStone Co	185	Yadanar Myat Noe Thwe Gem
92	Wan Full	186	Kyi Wai Yan
93	Aung Tu Ka Dana	187	Yadanar San Shwin Gem
94	Yadanar Moe Myay	188	Hee Ya Gems

The MSG also decided to include 31 additional companies based in the number of licenses owned by companies as follows:

No.	Additional List	Jade and Gem JV List
1	MOGOK PRIDE	Gem
2	EXCELLENT RUBY & SAPPHIRE	Gem
3	CHIT KYI YAE	Gem
4	SHWE NAING TUN	Gem
5	R.B.G	Gem
6	KHINE THIT SAR	Gem
7	MYANMAR LABA	Gem
8	METAL METERO	Gem
9	RUBY TIGER	Gem
10	THAN HTIKE LU	Gem
11	BIRDS GEM	Gem
12	ZABUKYAWAUNG	Gem
13	KYAN FAMILY	Gem
14	HTAY PAING	Gem
15	JADE YADANAR*	Jade
16	RED MOUNTAIN	Jade
17	JADE YADANAR*	Jade
18	KYAW NAING & BROTHERS	Jade
19	SEILOM TAUNG TANG*	Jade
20	WAI AUNG KABAR*	Jade
21	LINN LATT WIN*	Jade
22	LAW LU	Jade
23	PHOE THER HTOO*	Jade
24	JADE VARIETY*	Jade
25	MYO NEW*	Jade
26	U YA GEMS*	Jade
27	MYANMAR SITHU	Jade
28	THEITHI AUNG NGWE MOE	Jade
29	Pwint Phoo Nadi	Jade
30	SHWE YWET HLWER*	Jade
31	Emerald Garden*	Jade

(\*) Company already selected on the basis of MONREC, IRD, MCD and Forest Department data

The MSG decided also to add the company Myanmar Economic Corporation the reconciliation scope.

Therefore, based on the above criteria, the reconciliation scope decided by the MSG for the FY 2017-2018 is as follows:

**Table 111: Final list of G&J companies selected in the scope**

N°	Company name	N°	Company name
1	Linn Lett Win Yadanar Gems Co Ltd	106	Same Nay Chi (SNC)
2	Yar Za Htar Ni	107	Seine Light
3	YADANAR TAUNG TEN	108	New Lucky Green Gems
4	Wai Aung Gabar	109	Mya San Dar (MSD)
5	Ayeyar Yadanar Gems & Jewellery Co., Ltd	110	Jade Thazin
6	A K N K	111	Kaung Su Aung
7	SILVER ELEPHANT GEMS CO LTD	112	Kachin National Development
8	Phyo Thiha Kyaw	113	Kyaut Seinn Tapyay
9	Same Wai Hlaing (SWH)	114	Kaung Wai Yan Co
10	Mya Garden (GEG)	115	Green Diamond Gems & Jewellery Co. Ltd
11	Kan Pwint Oo	116	Lucky Star Jade Group
12	Shwe Ngar Koe Kaung	117	Yadanar Si
13	Shwe Gaung Gems Co Ltd	118	All Right Company
14	Htun Tauk Zabu Gems & Jewellery Co;Ltd.	119	Jewel Crown Company
15	Sein Lon Taung Tan (SLTT-S)	120	Kaung Mon Yadanar
16	Ayar Jade	121	Seine Yaung Myay
17	Shining Star Light Gems & Jewellery Co.,Ltd	122	Global Sun Light
18	Yadanar Sin Thiri Gems Co	123	Aung Hlaing Kyawlwa
19	SHWE OAK KHAI MINING CO., LTD.	124	Value Standard
20	Jade Mountain	125	Seine Aung
21	Thi Yaw Ma Ni	126	Myint Shinn
22	Phoe Thar Htoo	127	U Kyaw Thet
23	Myanma Seinn Lei Aung Gems Co Ltd.	128	Buu Gar
24	Yadanar Yaung Chi	129	Jade Shae Saung
25	Lin Htet Aung	130	Jade Min
26	Norbal Three Star (GMMK)	131	Yi Li Fa [YLF]
27	WAN BROTHERS	132	Pyi Yadanar
28	Mya Yaung Tun	133	MELODIOUS GEMS COMPANY LIMITED
29	Nan Htike Pyae Paing Co	134	Myanmar Thura [MTY]
30	Khun Paooe	135	Kyaut Seinnnn Karbarkyaw
31	Great wall Gems&Jade company	136	Hole In One
32	Great Genesis Gems (GMH)	137	Nay Chi Yadanar
33	Htat Aye Yar	138	Kyauk Seinn Wingabar Jade Gems & Jewellery Co.
34	Wai Family	139	Oo Ru Seine Yadanar
35	Sai Taung Co	140	Kaung Htike
36	Kyauk Same Nan Taw (GKN)	141	Sein Minn Yadanar
37	Jade Land	142	Treasure Five Star Co., Ltd
38	Jade Than Lwin	143	Kyei Linn Gems & Jade Company
39	1 1 1	144	Ngwe Young Stone
40	Kaung Myat Thu Ka	145	Wan Chang
41	Seine Pwint Wai	146	Khaing Lon Gems
42	Khine Myanmar	147	Pon Taung Thar

N°	Company name	N°	Company name
43	Unity	148	Palaung National
44	Wai Yan Thar (WYT)	149	Treasure Linn
45	Sin Gaung Taung	150	Treasure White Lotus
46	GREEN MOUNTAIN CO;LTD	151	Sein Thura San
47	Chang Long Gems & Jewellery Co Ltd	152	Aung Shwe Kabar
48	Kyaut Myat Min	153	San Taw Win
49	Yadanar Shwe Ye Win	154	Jade Crystal Palace
50	Myit Sone Ayar	155	Shwe Hwa
51	Yadanar Aung Chan	156	Aung Myin Thu Gems & Jewellery Co.,Ltd
52	Myanmar Imperial Jade Co	157	Gold Jade
53	Khin Zaw Aung & Brother	158	Thet Hein
54	Myanmar First Gems & Jewellery Co Ltd	159	Myanmar Kywal Wa Thaw Myay
55	Ever Winner [EW]	160	MEGA STAR JEWEL LIMITED
56	Shwe Hein Htet Gems Co Ltd	161	Kan Sein Pwint
57	Myo Nwe Gems	162	Myanmar Winning Gate (GMWG)
58	Tun Naing Aung	163	San Family
59	Nay Min Kabar Co	164	Hone Yin Yi Shin
60	Zebu Thiri Gems Co.,Ltd	165	Green Comet gems& Jade company
61	Yadanar Three Elephants Co	166	Gandawin Kyaut Myat Garden
62	Kyaing International (GKI)	167	Kaung Taw Myay
63	Nan Oo Yadanar	168	U Hla Soe Oo
64	Su Htu Pan	169	80000
65	Long Byit	170	Than Lwin Kyaw Kyar
66	Super Sein	171	Kyauk Myet Shwe Pyi
67	Win Lei Yadanar	172	Moe Brothers
68	Kyal Sin Phyu	173	Innwa Nay Chi Co
69	Treasure Star Co., Ltd	174	Jade Master
70	ARS Gems [ARS]	175	Taw Win Jade Dragon
71	Yadanar Pyae Phyo Aung	176	Shwe Tun Win
72	Jade Padathar Gems Co,Ltd	177	Kan Thar Yar
73	Ruby Dragon Company	178	Jade Brothers
74	Northern Jade World	179	Myat Myittar Mon (G & J) Co.,Ltd
75	Kaung Htet Khaing	180	Pang Huke Duwa Co.,Ltd
76	Kaung Swan Htet Co	181	Shwe Pyi Thar Gems Trading and Faceting Co-op,Ltd
77	Shwe Ywat Hlwar	182	Khant Shwe Pyi Co.,Ltd
78	Same Lei Yadanar Win Co (SLYW)	183	Nilar Yoma
79	Hpakan King Gems & Jewellery Co. Ltd	184	Lyan Shan
80	Agga Yadanar Jade Gems & Jewellery Co., LTD	185	Yadanar Myat Noe Thwe Gem
81	Shwe War Myae (mandalay)	186	Kyi Wai Yan
82	Delta Land	187	Yadanar San Shwin Gem
83	Seine Lone Aung	188	HERA Co., ltd
84	Aung Hein Minn	189	MOGOK PRIDE
85	Kyauk Seinn Sun Shwin Jade Gems & Jewellery Co Ltd	190	EXCELLENT RUBY & SAPPHIRE
86	Yadanar Aung Tun Tauk	191	CHIT KYI YAE
87	U YA GEMS	192	SHWE NAING TUN



N°	Company name	N°	Company name
88	Chaung Brother	193	R.B.G
89	Myat Yamon	194	KHINE THIT SAR
90	Nay La Pwint	195	Myanmar Lar Ba Gems Co., Ltd.
91	Ma Li Kha Gemstone Co	196	METAL METERO
92	Wan Full	197	RUBY TIGER
93	Aung Tu Ka Dana	198	THAN HTIKE LU
94	Yadanar Moe Myay	199	BIRDS GEM
95	Shine Family	200	ZABUKYAWAUNG
96	Thein Gabar Aung	201	KYAN FAMILY
97	Jade Treasure	202	HTAY PAING
98	Lawka Nandar	203	RED MOUNTAIN
99	Ngwe Si Hein	204	KYAW NAING & BROTHERS
100	Myat Pan Khaing	205	LAW LU
101	Lon Hai	206	MYANMAR SITHU
102	Shwe Yaung Sin	207	THEITHI AUNG NGWE MOE
103	Hein Aung Lin Htet Jade Co. Ltd	208	Pwint Phoo Nadi
104	Phar Kant Sai Bon	209	Myanmar Economic Corporation
105	Thigi Myintzu Yadanar		

For the other companies which made payments below the thresholds presented above, we recommend the disclosure by Government Agency of the combined benefit streams, including those companies whose production are exported, in accordance with EITI Requirement 3.

#### d. Mining sector

The payments made by the mining companies were collected by MONREC (including ME1 and ME2), IRD, the Customs Department and the Forest Department. Details of these payments by Government Agency are as follows:

In billion Kyat		
Government Agency	Amount	%
IRD	100.80	67%
MONREC (including ME1 and ME2)	42.43	28%
Customs Department	5.51	4%
Forestry Department	1.49	1%
<b>Total</b>	<b>150.22</b>	<b>100%</b>

#### Materiality Analysis

Based on the data provided by MONREC (including ME1 and ME2), the profile of payments for other minerals sector in FY 2017-2018 is set out in the following table:

Mining Companies/Taxpayers				
Payment threshold	Number of companies /taxpayers	Revenue collected by MoM (billion Kyats)	Weight / total collected revenue	Cumulative weight
Amount > Kyats 5 billion	1	6.65	16%	16%
Kyats 1 billion <Amount <Kyats 5 billion	8	14.25	34%	49%
Kyats 0.5 billion <Amount <Kyats 1 billion	9	6.90	16%	66%
Kyats 0,15 billion <Amount <Kyats 0,5 billion	21	5.51	13%	79%
Kyats 0,10 billion <Amount <Kyats 0,15 billion	12	1.61	4%	82%
Kyats 50 million <Amount <Kyats 100 million	36	2.52	6%	88%
Amount <Kyats 50 million	539	4.99	12%	100%
<b>Total</b>	<b>1,038</b>	<b>42.43</b>	<b>100%</b>	

According to the above table, companies operating in other minerals subsector and which paid taxes of more than **0.15 bn Kyats** represent **79%** of the total revenues collected by MONREC.

The materiality threshold decided by MSG above means that mining companies making **79%** of reported payments to MONREC, ME1 and ME2 will be included in the reconciliation i.e. all companies making payments to MONREC, ME1 and ME2 in excess of **0.15 bn Kyats**.

Accordingly, the MSG decided to include the 39 companies detailed below in the reconciliation scope.

Company Reg No	Company	Type of mineral
101027546	NATIONAL PROSPERITY COMPANY LIMITED	Gold
105444192	MYANMAR ECONOMIC CORPORATION LIMITED	Limestone/ Clay/ Copper/ Coal/ Marble/ Granite/ Gypsum
116058790	GEO ASIA INDUSTRY & MINING COMPANY LIMITED	Gold
117328058	CORNERSTONE RESOURCES (MYANMAR) LTD.	Zin
107350594	ETERNAL MINING COMPANY LIMITED	Gold
103947189	MYANMA ECONOMIC HOLDINGS PUBLIC COMPANY LIMITED	Gold/ Copper/ Coal/ Granite/ Bauxite
111611327	KAYAH STATE MINERAL PRODUCTION COMPANY LIMITED	Tin & Tungsten Associated
101082474	SHWE MOE YAN COMPANY LIMITED	Gold/ Lead & Associated
109035068	GPS JOINT VENTURE COMPANY LIMITED	Lead
178268163	SHWE TAUNG MINING COMPANY LIMITED	Limestone/ Clay/ Coal
106646872	DELCO LIMITED	Tin & Tungsten
141288016	MAX (MYANMAR) COMPANY LIMITED	Limestone/ Coal

Company Reg No	Company	Type of mineral
101585220	FIRST RESOURCES COMPANY LIMITED	Gypsum
113988045	PACIFIC LINK CEMENT INDUSTRIES LIMITED	Limestone
112358587	WIN MYINT MO INDUSTRIES COMPANY LIMITED	Lead & Zinc Associated
	No. (2) Heavy Industry, Ministry of Industry	Glass Sand/ Limestone/ Marble/ Buxite/ Clay/ Iron
106803838	MYANMAR PONGPIPAT COMPANY LIMITED	Tin & Tungsten
155743298	NGWE YI PALE MINING COMPANY LIMITED	Limestone/ Buxite/ Coal/ Gypsum
101781372	NEW DAYS ASIA MINING COMPANY LIMITED	Lead & Associated
131415710	HTOO INTERNATIONAL INDUSTRY GROUP COMPANY LIMITED	Iron/ Coal/ Gypsum
110005199	HARBOR STAR MINING COMPANY LIMITED	Copper& Associated (Lead & Zinc)
118051289	MANDALAY GOLDEN FRIEND MINING CO., LTD.	Coal
109529788	MYANMAR GOLDEN POINT FAMILY CO., LTD.	Gold
179607255	THAN TAW MYAT COMPANY LIMITED	Limestone
113284412	TUN THWIN MINING COMPANY LIMITED	Coal
104054625	MANDALAY DISTRIBUTION & MINING COMPANY LIMITED	Coal
	YCDC	Coal
163480255	SAN LIN INTERNATIONAL EXPORT & IMPORT COMPANY LIMITED	Iron/ Lead & Zinc Associated
110622678	KAN PWINT OO MINING COMPANY LIMITED	Coal
117343227/ 108012463	TOP TEN STAR PRODUCTION CO., LTD.	Lead & Associated
102961366	HEAY HEIN COMPANY LIMITED	Coal
101201996	NGWE KABAR MYANMAR COMPANY LIMITED	Tin & Tungsten
103947189	MYAUK KYUN THU MA MINING & REFINERY COMPANY LIMITED	Gold
104418821	XIE SHAN MINING PRODUCTION & MARKETING COMPANY LIMITED	Lead
117675386	DRAGON CEMENT COMPANY LIMITED	Coal/ Limestone
102093003	PRINCE MANUFACTURING COMPANY LIMITED	Lead & Zinc Associated
103472008	HTAT YEE LINN MINING & REFINERY COMPANY LIMITED	Gold
103600111	MYAY NAGAR MINING COMPANY LIMITED	Lead
114804703	THA BYU MINING COMPANY LIMITED	Antimony

Moreover, the following payments in kind were received by MONREC from the other minerals sector in the FY 2017-2018:

Name of Company	Type of Minerals	In Kind per payment Ton
MYANMAR ECONOMIC CORPORATION LIMITED	Copper	2,158.95
MYANMA ECONOMIC HOLDINGS PUBLIC COMPANY LIMITED	Copper	2,830.23
MYANMAR CNMC NICKEL COMPANY LIMITED	Nickel	867.00
	Ferronickel	2,451.49

According to the above table, only the company “MYANMAR CNMC NICKEL COMPANY LIMITED” is selected for the reconciliation exercise.

Following the review of the documentation received from the ME2, we identified the following payments in kind (Gold) from the mining sector in FY 2017-2018:

Company	Type of Minerals	In Kind (Payment) Toz	Weight / total collected revenue	Cumulative weight
NATIONAL PROSPERITY GOLD PRODUCTION GROUP LIMITED *	Gold	3,961.32	37%	37%
GEO ASIA INDUSTRY & MINING COMPANY LIMITED *	Gold	1,575.67	15%	51%
ETERNAL MINING COMPANY LIMITED *	Gold	955.00	9%	60%

Company	Type of Minerals	In Kind (Payment) Toz	Weight / total collected revenue	Cumulative weight
SHWE MOE YAN COMPANY LIMITED *	Gold	613.15	6%	66%
MYANMA ECONOMIC HOLDINGS PUBLIC COMPANY LIMITED *	Gold	418.95	4%	70%
MYANMAR GOLDEN POINT FAMILY CO., LTD.	Gold	110.25	1%	71%
HTAT YEE LINN MINING & REFINERY COMPANY LIMITED	Gold	106.05	1%	72%
MYAUK KYUN THU MA MINING & REFINERY COMPANY LIMITED	Gold	97.65	1%	73%
MYANMAR GOLDEN POINT FAMILY CO., LTD	Gold	96.25	1%	74%
AGGA YADANAR MINING COMPANY LIMITED	Gold	78.75	1%	74%
RUBY DRAGON MINING COMPANY LIMITED	Gold	77.70	1%	75%
THEIDDI AUNG SHWE MOE MINING COMPANY LIMITED	Gold	75.60	1%	76%
MYANMAR KYIN SEIN COMPANY LIMITED	Gold	63.00	1%	76%
AUNG HTUN LINN SHEIN WIN MINING & REFINERY COMPANY LIMITED	Gold	59.85	1%	77%
WARM POOL COMPANY LIMITED	Gold	54.60	1%	77%
MYA THEINGI MINERAL PRODUCTION COMPANY LIMITED	Gold	53.55	0%	78%
ASIA GOLDEN LIGHT MINING COMPANY LIMITED	Gold	50.40	0%	78%
MAY FLOWER MINING ENTERPRISES LIMITED	Gold	50.40	0%	79%
SEA SUN STAR MINING PRODUCTION & MARKETING COMPANY LIMITED	Gold	50.40	0%	79%
YADANAR AUNG TAW MU MINING COMPANY LIMITED	Gold	50.40	0%	80%
SHWE URU AUNG MINING COMPANY LIMITED	Gold	39.90	0%	80%
HONG YUAN SHENG COMPANY LIMITED	Gold	37.80	0%	80%
THAN SHWE YI AUNG COMPANY LIMITED	Gold	37.80	0%	81%
AUNG WOON NAY COMPANY LIMITED	Gold	31.50	0%	81%
DOUBLE DRAGON COMPANY LIMITED	Gold	31.50	0%	81%
SAI AGRICULTURE INVESTMENT COMPANY LIMITED	Gold	31.50	0%	82%
SAN PARAME MINING COMPANY LIMITED	Gold	31.50	0%	82%
SHWE PYI THAR GOLD PRODUCTION & REFINING CO., LTD	Gold	31.50	0%	82%
SOUTHERN BANNER MINING COMPANY LIMITED	Gold	31.50	0%	83%
AYE NYEIN DANA COMPANY LIMITED	Gold	30.45	0%	83%
TAN CHU SHIN MINING COMPANY LIMITED	Gold	30.45	0%	83%
SHWE TAUNG NYUNT COMPANY LIMITED	Gold	29.92	0%	83%
ZA LATT PWINT PHU COMPANY LIMITED	Gold	29.40	0%	84%
ARKAR MYINT MANUFACTURING COMPANY LIMITED	Gold	28.35	0%	84%
MYANMAR SHWE PYI HEIN COMPANY LIMITED	Gold	28.35	0%	84%
NGWE LA WON THA MINING COMPANY LIMITED	Gold	28.35	0%	84%
SHWE PYI KYAL TAKHON COMPANY LIMITED	Gold	28.35	0%	85%
TACHILEIK SHWE SIN COMPANY LIMITED	Gold	28.35	0%	85%
TACHILEIK SHWE TAUNG CO., LTD	Gold	28.35	0%	85%
TUN PYI THEIN SAN COMPANY LIMITED	Gold	28.35	0%	85%
WAI TEL MINING COMPANY LIMITED	Gold	28.35	0%	86%
SHWE SIN MOE COMPANY LIMITED	Gold	28.34	0%	86%
FUTURE ENGINEERING & GOLD, MINING CO., LTD	Gold	27.30	0%	86%
GOLD WINNER ASSOCIATION COMPANY LIMITED	Gold	27.30	0%	87%
KAUNG KIN KYEI SIN MINING COMPANY LIMITED	Gold	27.30	0%	87%
SHWE AYE YEIK COMPANY LIMITED	Gold	27.30	0%	87%
SHWE MOE THOON AUNG MINING COMPANY	Gold	27.30	0%	87%
GOLDEN MOON LIGHT COMPANY LIMITED	Gold	26.77	0%	88%
AUNG SHWE SIN MYAT COMPANY LIMITED	Gold	25.20	0%	88%
GOLDEN VILLEY INTERNATIONAL DEVELOPMENT COMPANY LIMITED	Gold	25.20	0%	88%
HEIN MYITTAR MINING COMPANY LIMITED	Gold	25.20	0%	88%

Company	Type of Minerals	In Kind (Payment) Toz	Weight / total collected revenue	Cumulative weight
HTEAN SHWE MINING COMPANY LIMITED	Gold	25.20	0%	88%
PHWINT PHYO THIT COMPANY LIMITED	Gold	25.20	0%	89%
PHYAUNGT PHYU PYAW SHWIN COMPANY LIMITED	Gold	25.20	0%	89%
SEIN NAW MINING COMPANY LIMITED	Gold	25.20	0%	89%
SHWE LET WEL THONENARA MINING COMPANY LIMITED	Gold	25.20	0%	89%
SHWE MI KHIN TAUNG MINING COMPANY LIMITED	Gold	25.20	0%	90%
SHWE THEIN THAN KABA MINERAL MANUFACTURING COMPANY LIMITED	Gold	25.20	0%	90%
YARZA MIN SHWE MINING COMPANY LIMITED	Gold	25.20	0%	90%
SHWE SU THAN MINING COMPANY LIMITED	Gold	21.00	0%	90%
AUNG SHWIN LE COMPANY LIMITED	Gold	15.75	0%	90%
AWZAR SHWE PYAE MINING COMPANY LIMITED	Gold	15.75	0%	91%
HEIN KAUNG SAT MINING COMPANY LIMITED	Gold	15.75	0%	91%
LWE KHAM LONE MINING COMPANY LIMITED	Gold	15.75	0%	91%
NGWE TAUNG MINN COMPANY LIMITED	Gold	15.75	0%	91%
PYAE MINING COMPANY LIMITED	Gold	15.75	0%	91%
SAI AUNG SHAN MINING CORPORATE COMPANY LIMITED	Gold	15.75	0%	91%
SHAN SHWE LI MINING COMPANY LIMITED	Gold	15.75	0%	91%
SHWE TAUH HTAIN COMPANY LIMITED	Gold	15.75	0%	92%
THAN HTIKE SHWE SIN MINING COMPANY LIMITED	Gold	15.75	0%	92%
UNITED POWER RESOURCES COMPANY LIMITED	Gold	15.75	0%	92%
YADANAR THAKHIN MINING COMPANY LIMITED	Gold	15.75	0%	92%
LIN KHANT KYAW COMPANY LIMITED	Gold	15.23	0%	92%
SHWE MAHAW MINING COMPANY LIMITED	Gold	15.23	0%	92%
AUNG LA PYAE COMPANY LIMITED	Gold	15.22	0%	92%
AUNG PYAE PHYO COMPANY LIMITED	Gold	15.22	0%	93%
PYI SONE AUNG MINING COMPANY LIMITED	Gold	15.22	0%	93%
WANA AND SONS MINING COMPANY LIMITED	Gold	15.22	0%	93%
GOLD SEVEN STAR COMPANY LIMITED	Gold	14.70	0%	93%
GOLDEN ZAW MINING COMPANY LIMITED	Gold	14.70	0%	93%
HEIN THAN COMPANY LIMITED	Gold	14.70	0%	93%
KAN LINN THU MINING COMPANY LIMITED	Gold	14.70	0%	93%
KHAING SOE LINN COMPANY LIMITED	Gold	14.70	0%	94%
MAN SHWE THITSAR GEMS & JEWELLERY COMPANY LIMITED	Gold	14.70	0%	94%
NATURAL GOLD MINING & PRODUCTION COMPANY LIMITED	Gold	14.70	0%	94%
PYI CHIT THAR MINING COMPANY LIMITED	Gold	14.70	0%	94%
SEVEN TWO SEVEN MINING COMPANY LIMITED	Gold	14.70	0%	94%
IKELENG PHONE AUNG COMPANY LIMITED	Gold	14.17	0%	94%
SHWE HTAY BAMAR MINING COMPANY LIMITED	Gold	14.17	0%	94%
SHWE THANT OO COMPANY LIMITED	Gold	14.17	0%	94%
THWEMI THAR SU MINING CO, LTD	Gold	13.77	0%	95%
NAING MYINT MO COMPANY LIMITED	Gold	13.60	0%	95%
THIRI YADANAR TOE COMPANY LIMITED.	Gold	12.60	0%	95%
AUNG PYAE THAR MINING COMPANY LIMITED	Gold	12.60	0%	95%
AUNG TAING SAN MINING COMPANY LIMITED	Gold	12.60	0%	95%
BO MYINT MIN ZAW COMPANY LIMITED.	Gold	12.60	0%	95%
CERTAIN MINERAL EXPLORATION COMPANY LIMITED	Gold	12.60	0%	95%
EASTERN SHAN BRIGHT COMPANY LIMITED	Gold	12.60	0%	95%
Golden Brothers Unity Mining Co, Ltd	Gold	12.60	0%	96%
GOLDEN KING HOUSE COMPANY LIMITED	Gold	12.60	0%	96%

Company	Type of Minerals	In Kind (Payment) Toz	Weight / total collected revenue	Cumulative weight
GOLDEN MASCOT INTERNATIONAL TRADING COMPANY LIMITED	Gold	12.60	0%	96%
HMU MYAT SHIN COMPANY LIMITED	Gold	12.60	0%	96%
HTOON SHWE SIN MINING COMPANY LIMITED	Gold	12.60	0%	96%
HTUT KHAUNG KYAW MINING COMPANY LIMITED	Gold	12.60	0%	96%
IMAWBUM COMPANY LIMITED.	Gold	12.60	0%	96%
KYAW SOE YA SHWE MINING COMPANY LIMITED	Gold	12.60	0%	96%
LA PYI WUN GOLD MINING COMPANY LIMITED	Gold	12.60	0%	96%
MAHA SHWE ZABU CO., LTD	Gold	12.60	0%	97%
MARGA SHWE TAUNG COMPANY LIMITED	Gold	12.60	0%	97%
MEGA BANNER COMPANY LIMITED	Gold	12.60	0%	97%
MOE HTI MOE MI COLLECTIVE SMALL SCALE GOLD PRODUCTION ENTREPRENEURS COMPANY LIMITED	Gold	12.60	0%	97%
MYANMAR SHWE TOE PWAR MANN MINING COMPANY LIMITED	Gold	12.60	0%	97%
MYANMAR SHWE YARZAR COMPANY LIMITED	Gold	12.60	0%	97%
MYINT OO AUNG COMPANY LIMITED	Gold	12.60	0%	97%
NATURE MEN COMPANY LIMITED	Gold	12.60	0%	97%
NAUNG TONG DRAGON COMPANY LIMITED	Gold	12.60	0%	98%
NILAR LIN LAT CO., LTD	Gold	12.60	0%	98%
SEIN MYA LWIN MINING CO., LTD	Gold	12.60	0%	98%
SHINN THANT AUNG MYIN MINING COMPANY LIMITED	Gold	12.60	0%	98%
SHWE LA WYAING MANUFACTURING COMPANY LIMITED	Gold	12.60	0%	98%
SHWE MOE SANEAIN COMPANY LIMITED	Gold	12.60	0%	98%
SHWE OH SI MINING COMPANY LIMITED	Gold	12.60	0%	98%
SHWE PHYOE KYWE MINING COMPANY LIMITED	Gold	12.60	0%	98%
SHWE SINGU REGION DEVELOPMENT PUBLIC COMPANY LIMITED	Gold	12.60	0%	98%
SHWE SUNE THAIKE COMPANY LIMITED	Gold	12.60	0%	99%
SHWE TOE HLYAN COMPANY LIMITED	Gold	12.60	0%	99%
SHWE WAR WIN AUNG COMPANY LIMITED	Gold	12.60	0%	99%
SI SHWE TOE COMPANY LIMITED	Gold	12.60	0%	99%
SOUTHERN VALUE MINING COMPANY LIMITED	Gold	12.60	0%	99%
THITSAR MYINT MYAT COMPANY LIMITED	Gold	12.60	0%	99%
TREASURE OF TRUTH COMPANY LIMITED	Gold	12.60	0%	99%
TUN HEIN HLYAN COMPANY LIMITED	Gold	12.60	0%	99%
YADANAR KADAE THAIK TRADING COMPANY LIMITED (ဓမ္မဒါန)	Gold	12.60	0%	100%
YADANAR KYWE WA CHAN THAR MINING COMPANY LIMITED	Gold	12.60	0%	100%
YADANAR SHWE POUN MINING COMPANY LIMITED	Gold	12.60	0%	100%
NC	Gold	12.60	0%	100%
NC	Gold	12.60	0%	100%
<b>Total</b>		<b>10,789.79</b>	<b>100%</b>	

According to the above table, the companies paying more than **400 Toz** represent **70%** of the total revenue in kind collected by the ME2 from companies operating in other minerals subsector.

The materiality threshold decided by MSG above means that mining companies making **70%** of reported payments in kind to ME2 will be included in the reconciliation i.e. all companies making payments in kind to ME2 in excess of **400 Toz**.

According to the above, five (5) companies will be selected for the reconciliation exercise on the basis of the data obtained from MONREC as follows:

Company	Type of Minerals
NATIONAL PROSPERITY GOLD PRODUCTION GROUP LIMITED *	Gold
GEO ASIA INDUSTRY & MINING COMPANY LIMITED *	Gold
ETERNAL MINING COMPANY LIMITED *	Gold
SHWE MOE YAN COMPANY LIMITED *	Gold
MYANMA ECONOMIC HOLDINGS PUBLIC COMPANY LIMITED *	Gold

(\*) Company already selected on the basis of MONREC data

Given that all these companies have already been selected on the basis of MONREC data, no companies are selected on the basis of ME2 in kind payments.

Furthermore, the following payments in kind (Tin/ Tungsten Mixed Ore) were received by ME 2 from the other minerals sector in the FY 2017-2018:

Company	Type of Minerals	In Kind (Payment) MT	Weight / total collected revenue	Cumulative weight
KAYAH STATE MINERAL PRODUCTION COMPANY LIMITED	Tin	146.61	34%	34%
DELCO LIMITED	Tin	118.61	27%	61%
MYANMAR PONGPIPAT COMPANY LIMITED	Tin	81.59	19%	80%
NGWE KABAR MYANMAR COMPANY LIMITED	Tin	26.24	6%	86%
YE HTUT KYAW MINING COMPANY LIMITED	Tin	10.00	2%	89%
MYANMAR TIN -TUNGSTEN COMPANY LIMITED	Tin	9.60	2%	91%
MINING WORLD COMPANY LIMITED	Tin	8.53	2%	93%
DAWEI MYAY MINING COMPANY LIMITED	Tin	5.33	1%	94%
POPA-L COMPANY LIMITED	Tin	3.96	1%	95%
KAYAH HTARNI MINING COMPANY LIMITED	Tin	3.94	1%	96%
LIR MU KOH COMPANY LIMITED	Tin	3.94	1%	97%
U SAUNG THU MINING COMPANY LIMITED	Tin	3.36	1%	98%
WAI INTERNATIONAL MANUFACTURING COMPANY LIMITED	Tin	2.76	1%	98%
KAYAH GOLDEN GATE MINING COMPANY LIMITED	Tin	2.35	1%	99%
AUNG HEIN BO WIN COMPANY LIMITED	Tin	1.75	0%	99%
PYAE SONE MYAT MINING COMPANY LIMITED	Tin	1.50	0%	100%
NAN THILAR MINING COMPANY LIMITED	Tin	1.03	0%	100%
SILVER BRIGHT COMPANY LIMITED	Tin	0.51	0%	100%
<b>Total</b>		<b>431.61</b>	<b>100%</b>	

According to the above table, companies operating in other minerals subsector and which paid more than 9 MT represent 91% of the total revenues in kind collected by ME2.

The materiality threshold decided by MSG above means that mining companies making 91% of reported payments in kind to ME2 will be included in the reconciliation i.e. all companies making payments in kind to ME2 in excess of 9 MT.

According to the above, five (5) companies will be selected for the reconciliation exercise on the basis of the data obtained from MONREC as follows:

Company	Type of Minerals
KAYAH STATE MINERAL PRODUCTION COMPANY LIMITED *	Tin
DELCO LIMITED *	Tin
MYANMAR PONGPIPAT COMPANY LIMITED *	Tin
NGWE KABAR MYANMAR COMPANY LIMITED *	Tin
YE HTUT KYAW MINING COMPANY LIMITED	Tin
MYANMAR TIN -TUNGSTEN COMPANY LIMITED	Tin

(\*) Company already selected on the basis of MONREC data

#### Materiality analysis of IRD data

Based on the data provided by IRD, the payments for other minerals sector in FY 2017-2018 are set out in the following table:

Mining Companies/Taxpayers				
Payment threshold	Number of companies/ taxpayers	Revenue collected by IRD (billion Kyats)	Weight / total collected revenue	Cumulative weight
Amount > Kyats 10 billion	2	78.50	78%	78%
Kyats 1 billion <Amount <Kyats 10 billion	3	14.64	15%	92%
Kyats 0.5 billion <Amount <Kyats 1 billion	3	2.17	2%	95%
Amount <Kyats 0.5 billion	317	5.48	5%	100%
<b>Total</b>	<b>325</b>	<b>100.80</b>	<b>100%</b>	

According to the above table, companies operating in the other minerals sector and which paid taxes of more than 1 billion Kyats represent 92% of the total revenues collected by IRD.

The materiality threshold decided by MSG above means that mining companies making 92% of reported payments to IRD will be included in the reconciliation i.e. all companies making payments to IRD in excess of 1 billion Kyats.

According to the above, five (5) companies are selected for the reconciliation exercise on the basis of the data obtained from IRD as follows:

License holder	Total	billion Kyats	
		Total collected revenue	Cumulative Revenue
Myanmar Yang Tse Copper Ltd	50.03	50%	50%
Myanma Economic Holdings Public Co., Ltd *	28.47	28%	78%
Myanmar Economic Corporation *	8.96	9%	87%
Eden Energy & Natural Resources Development Co., Ltd	3.69	4%	90%
Kanbawza Industries Ltd	1.97	2%	92%

(\*) Company already selected on the basis of MONREC data



## Materiality analysis of Customs department data

Based on the data provided by the Customs Department, payments for other minerals sector in the FY 2017-2018 are set out in the following table:

Mining Companies/Taxpayers				
Payment threshold	Number of companies/ taxpayers	Revenue collected by Customs Department	Weight / total collected revenue	Cumulative weight
Amount > Kyats 1 billion	2	4.62	84%	84%
Kyats 0.1 billion <Amount <Kyats 1 billion	2	0.52	9%	93%
Amount <Kyats 0.1 billion	31	0.37	7%	100%
<b>Total</b>	<b>35</b>	<b>5.51</b>	<b>100%</b>	

According to the above table, companies operating in the other minerals sector and which paid taxes of more than **0.1 bn Kyats** represent **93%** of the total revenue collected by the Customs Department from companies.

The materiality threshold decided by MSG above means that mining companies making 93% of reported payments to the Customs Department will be included in the reconciliation i.e. all companies making payments to the Customs Department in excess of Kyats 0.1 bn.

According to the above, four (4) companies are selected for the reconciliation exercise on the basis of the data obtained from the Customs Department as follows:

### License holder

MYANMAR WANBAO MINING COPPER LTD.

MYANMAR YANG TSE COPPER LIMITED. \*\*

MYANMA ECONOMIC HOLDINGS LIMITED. \*

CORNERSTONE RESOURCES (MYANMAR) LTD. \*

(\*) Company already selected on the basis of MONREC data

(\*\*) Company already selected on the basis of IRD data

## Materiality analysis of Forest Department

Based on the data provided by the Forest Department, payments for other minerals sector in the FY 2017-2018 are set out in the following table:

Mining Companies/Taxpayers				
Payment threshold	Number of companies/ taxpayers	Revenue collected by Forest Department (billion Kyats)	Weight / total collected revenue	Cumulative weight
Amount > Kyats 0.1 billion	3	0.88	59%	59%
Kyats 20 million <Amount <Kyats 0.1 billion	6	0.29	19%	78%
Amount <Kyats 20 billion	89	0.32	22%	100%
<b>Total</b>	<b>98</b>	<b>1.49</b>	<b>100%</b>	

According to the above table, companies operating in the other minerals sector and which paid taxes of more than **20 million Kyats** represent **78%** of the total revenues collected by the Forestry Department.

The materiality threshold decided by MSG above means that mining companies making 78% of reported payments to the Forestry Department will be included in the reconciliation i.e. all companies making payments to the Forest Department in excess of **20 million Kyats**.

According to the above, the additional companies detailed below are selected for the reconciliation exercise on the basis of the data obtained from the Customs Department as follows:

License holder
TUN THWIN *
HTAR WA YA
MANDALAY DISTRIBUTION *
MAX MYANMAR *
YANGON CITY DEVELOPMENT COMMITTEE
WUNTHO RESOURCES*
SHWE TAUNG *
MYANMAR ECONOMIC HOLDINGS LIMITED *
TUN TAU SA *

(\*) Company already selected on the basis of MONREC data

### Proposed scope

The materiality thresholds recommended above means that mining companies making 88% of reported payments to MONREC, ME1, ME2, IRD, MCD and FD will be included in the reconciliation scope.

Therefore, on the basis of the data obtained from MONREC, ME1, ME2, IRD, Customs Department and Forest Department, 47 companies will be selected for the reconciliation exercise:

N°	Company Reg No	Company	Type of mineral
1	101027546	NATIONAL PROSPERITY COMPANY LIMITED	Gold
2	105444192	MYANMAR ECONOMIC CORPORATION LIMITED	Limestone/ Clay/ Copper/ Coal/ Marble/ Granite/ Gypsum
3	116058790	GEO ASIA INDUSTRY & MINING COMPANY LIMITED	Gold
4	117328058	CORNERSTONE RESOURCES (MYANMAR) LTD.	Zin
5	107350594	ETERNAL MINING COMPANY LIMITED	Gold
6	103947189	MYANMA ECONOMIC HOLDINGS PUBLIC COMPANY LIMITED	Gold/ Copper/ Coal/ Granite/ Bauxite
7	111611327	KAYAH STATE MINERAL PRODUCTION COMPANY LIMITED	Tin & Tungsten Associated
8	101082474	SHWE MOE YAN COMPANY LIMITED	Gold/ Lead & Associated
9	109035068	GPS JOINT VENTURE COMPANY LIMITED	Lead
10	178268163	SHWE TAUNG MINING COMPANY LIMITED	Limestone/ Clay/ Coal
11	106646872	DELCO LIMITED	Tin & Tungsten
12	141288016	MAX (MYANMAR) COMPANY LIMITED	Limestone/ Coal
13	101585220	FIRST RESOURCES COMPANY LIMITED	Gypsum
14	113988045	PACIFIC LINK CEMENT INDUSTRIES LIMITED	Limestone
15	112358587	WIN MYINT MO INDUSTRIES COMPANY LIMITED	Lead & Zinc Associated
16		No. (2) Heavy Industry, Ministry of Industry	Glass Sand/ Limestone/ Marble/ Buxite/ Clay/ Iron
17	106803838	MYANMAR PONGIPAT COMPANY LIMITED	Tin & Tungsten
18	155743298	NGWE YI PALE MINING COMPANY LIMITED	Limestone/ Buxite/ Coal/ Gypsum
19	101781372	NEW DAYS ASIA MINING COMPANY LIMITED	Lead & Associated
20	131415710	HTOO INTERNATIONAL INDUSTRY GROUP COMPANY LIMITED	Iron/ Coal/ Gypsum
21	110005199	HARBOR STAR MINING COMPANY LIMITED	Copper& Associated (Lead & Zinc)
22	118051289	MANDALAY GOLDEN FRIEND MINING CO., LTD.	Coal
23	109529788	MYANMAR GOLDEN POINT FAMILY CO., LTD.	Gold
24	179607255	THAN TAW MYAT COMPANY LIMITED	Limestone
25	113284412	TUN THWIN MINING COMPANY LIMITED	Coal

N°	Company Reg No	Company	Type of mineral
26	104054625	MANDALAY DISTRIBUTION & MINING COMPANY LIMITED	Coal
27		YCDC	Coal
28	163480255	SAN LIN INTERNATIONAL EXPORT & IMPORT COMPANY LIMITED	Iron/ Lead & Zinc Associated
29	110622678	KAN PWINT OO MINING COMPANY LIMITED	Coal
30	117343227/ 108012463	TOP TEN STAR PRODUCTION CO., LTD.	Lead & Associated
31	102961366	HEAY HEIN COMPANY LIMITED	Coal
32	101201996	NGWE KABAR MYANMAR COMPANY LIMITED	Tin & Tungsten
33	103947189	MYAUK KYUN THU MA MINING & REFINERY COMPANY LIMITED	Gold
34	104418821	XIE SHAN MINING PRODUCTION & MARKETING COMPANY LIMITED	Lead
35	117675386	DRAGON CEMENT COMPANY LIMITED	Coal/ Limestone
36	102093003	PRINCE MANUFACTURING COMPANY LIMITED	Lead & Zinc Associated
37	103472008	HTAT YEE LINN MINING & REFINERY COMPANY LIMITED	Gold
38	103600111	MYAY NAGAR MINING COMPANY LIMITED	Lead
39	114804703	THA BYU MINING COMPANY LIMITED	Antimony
40	115122282	YE HTUT KYAW MINING COMPANY LIMITED	Tin & Tungsten
41	106131341	MYANMAR TIN -TUNGSTEN COMPANY LIMITED	Tin & Tungsten
42		Myanmar Yang Tse Copper Ltd	Copper
43	118193601	Eden Energy & Natural Resources Development Co., Ltd	Barite
44	134879211	Kanbawza Industries Ltd	Limestone/ Coal/ Gypsum
45		MYANMAR WANBAO MINING COPPER LTD	Copper
46		HTAR WA YA	
47	108341157	MYANMAR CNMC NICKEL COMPANY LIMITED	Nickel

The MSG also decided to include 32 large scale companies based on commodity and Acre as follows:

N°	Company Reg No	Company	Type of mineral
1	103687241	24 HOUR MINING & INDUSTRY COMPANY LIMITED	Limestone/ Gypsum
2	104959474	A & A NATURAL RESOURCES DEVELOPMENT CO., LTD	Tin & Tungsten
3	108410094	ASIA PHYO MINING COMPANY LIMITED	Limestone
4	111788340	BLUE DIAMOND CEMENT COMPANY LIMITED	Limestone
5	104028462	DAGON MINING COMPANY LIMITED	Coal
6	102404661	DIAMOND SHARK MINING COMPANY LIMITED	Tin & Tungsten
7		Directorate of Military office of Chief of Defence Industries, Ministry of Defence	Iron/ Coal/ Limestone
8	129020334	GREEN ASIA COMPANY LIMITED	Coal/ Limestone
9	100706083	GREEN STRATEGIC MINING COMPANY LIMITED	Quartz
10	100430363	GROUP OF FOUR MINING COMPANY LIMITED	Coal
11	105552475	HTUT KHAUNG KYAW MINING COMPANY LIMITED	Coal/ Gold
12	117418820	JUNE CEMENT INDUSTRY LTD.	Granite
13	116551748	LINN PYAE MINING COMPANY LIMITED	Lead & Zinc Associated
14	110744463	LOI CHAI NAGAR MINING COMPANY LIMITED	Coal
15	100784866	MAY FLOWER MINING ENTERPRISES LIMITED	Coal/ Gold
16	114974269	MINING WORLD COMPANY LIMITED	Tin & Tungsten
17	105617070	MOUNT CHING YING MINING COMPANY LIMITED	Lead & Zin Associated/ Marble
18	101715809	MYANMAR APEX MINING CO., LTD	Coal
19	112682317	MYANMAR NAING GROUP MINING COMPANY LTD	Limestone

N°	Company Reg No	Company	Type of mineral
20	110108567	MYANMAR SIMCO SONG DA JOINT STOK COMPANY LIMITED	Marble
21	116291568	MYINT INVESTMENT GROUP COMPANY LIMITED	Limestone
22		No. (3) Heavy Industry. Ministry Of Industry	Gypsum
23	118049551	SHWE PAUK MINING COMPANY LIMITED	Coal
24	109973629	SHWE PIN LE MINING & INDUSTRY COMPANY LIMITED	Tin & Tungsten
25	116492032	SILVER BRIGHT COMPANY LIMITED	Tin & Tungsten
26	115516027	THE SILVER LION MINING COMPANY LIMITED	Antimony
27	116447428	THIHA THANT HEIN MINING COMPANY LIMITED	Coal
28	102861965	TRIPLE "A" CEMENT INTERNATIONAL COMPANY LIMITED	Gypsum
29	119718384	U E EXPORT IMPORT COMPANY LIMITED	Coal
30	117032973	UNITED CEMENT COMPANY LIMITED	Limestone
31	111029180	YIG COMPANY LIMITED	Coal
32	108744308	YOUNG INVESTMENT GROUP COMPANY LIMITED	Limestone

Therefore, the MSG also decided to include 15 small scale companies based on Acre 100 and above as follows:

N°	Company Reg No	Company	Type of mineral
1	198408573	SEA SUN STAR MINING PRODUCTION & MARKETING COMPANY LIMITED	Copper Associated
2	104449093	ZABU TALU MINING COMPANY LIMITED	Copper Associated
3	100678624	RUBY DRAGON MINING COMPANY LIMITED	Antimony
4	3269/2016-17	HTAY FAMILY COMPANY LIMITED	Antimony
5	106135533	SEIN CHI LIN MINING CO., LTD.	Coal
6	103580234	AUNG HTUN LINN SHEIN WIN MINING & REFINERY COMPANY LIMITED	Gold
7	761/1998-1999	Future Mining Co.,Ltd	Gold
8	761/1998-1999	Future Engineering Gold Mining	Gold
9	103309565	SHWE MYINT THAUNG YINN INDUSTRY & MANUFACTURING COMPANY LIMITED	Gypsum
10	111192928	MYANMAR MYO KO MEDICAL INSTRUMENT COMPANY LIMITED	Iron
11	103798841	SAT WINE INN ARR MINING COMPANY LIMITED	Lead
12	106564965	SHWE SAPAR MINING COMPANY LIMITED	Lead & Zinc, Copper
13	103801990	NAN KANAUNG MINING & ENGINEERING COMPANY LIMITED	Manganese Dioxide
14	101853578	NEW ERA GOLD COMPANY LIMITED	Marble
15	106174911	SHWE PYI NAGAR COMPANY LIMITED	Quartz

Therefore, on the basis of the data obtained from MONREC, IRD, Customs Department, Forestry Department and MSG decision, 94 companies will be selected for the reconciliation exercise:

**Table 113 : List of other minerals companies selected in the scope**

N°	Company Reg No	Company	Type of mineral
1	101027546	NATIONAL PROSPERITY COMPANY LIMITED	Gold
2	105444192	MYANMAR ECONOMIC CORPORATION LIMITED	Limestone/ Clay/ Copper/ Coal/ Marble/ Granite/ Gypsum
3	116058790	GEO ASIA INDUSTRY & MINING COMPANY LIMITED	Gold
4	117328058	CORNERSTONE RESOURCES (MYANMAR) LTD.	Zin
5	107350594	ETERNAL MINING COMPANY LIMITED	Gold
6	103947189	MYANMA ECONOMIC HOLDINGS PUBLIC COMPANY LIMITED	Gold/ Copper/ Coal/ Granite/ Bauxite
7	111611327	KAYAH STATE MINERAL PRODUCTION COMPANY LIMITED	Tin & Tungsten Associated

N°	Company Reg No	Company	Type of mineral
8	101082474	SHWE MOE YAN COMPANY LIMITED	Gold/ Lead & Associated
9	109035068	GPS JOINT VENTURE COMPANY LIMITED	Lead
10	178268163	SHWE TAUNG MINING COMPANY LIMITED	Limestone/ Clay/ Coal
11	106646872	DELCO LIMITED	Tin & Tungsten
12	141288016	MAX (MYANMAR) COMPANY LIMITED	Limestone/ Coal
13	101585220	FIRST RESOURCES COMPANY LIMITED	Gypsum
14	113988045	PACIFIC LINK CEMENT INDUSTRIES LIMITED	Limestone
15	112358587	WIN MYINT MO INDUSTRIES COMPANY LIMITED	Lead & Zinc Associated
16		No (2)Heavy Industry, Ministry of Industry	Glass Sand/ Limestone/ Marble/ Buxite/ Clay/ Iron
17	106803838	MYANMAR PONGPIPAT COMPANY LIMITED	Tin & Tungsten
18	155743298	NGWE YI PALE MINING COMPANY LIMITED	Limestone/ Buxite/ Coal/ Gypsum
19	101781372	NEW DAYS ASIA MINING COMPANY LIMITED	Lead & Associated
20	131415710	HTOO INTERNATIONAL INDUSTRY GROUP COMPANY LIMITED	Iron/ Coal/ Gypsum
21	110005199	HARBOR STAR MINING COMPANY LIMITED	Copper& Associated (Lead & Zinc)
22	118051289	MANDALAY GOLDEN FRIEND MINING CO., LTD.	Coal
23	109529788	MYANMAR GOLDEN POINT FAMILY CO., LTD.	Gold
24	179607255	THAN TAW MYAT COMPANY LIMITED	Limestone
25	113284412	TUN THWIN MINING COMPANY LIMITED	Coal
26	104054625	MANDALAY DISTRIBUTION & MINING COMPANY LIMITED	Coal
27		YCDC	Coal
28	163480255	SAN LIN INTERNATIONAL EXPORT & IMPORT COMPANY LIMITED	Iron/ Lead & Zinc Associated
29	110622678	KAN PWINT OO MINING COMPANY LIMITED	Coal
30	117343227/ 108012463	TOP TEN STAR PRODUCTION CO., LTD.	Lead & Associated
31	102961366	HEAY HEIN COMPANY LIMITED	Coal
32	101201996	NGWE KABAR MYANMAR COMPANY LIMITED	Tin & Tungsten
33	103947189	MYAUK KYUN THU MA MINING & REFINERY COMPANY LIMITED	Gold
34	104418821	XIE SHAN MINING PRODUCTION & MARKETING COMPANY LIMITED	Lead
35	117675386	DRAGON CEMENT COMPANY LIMITED	Coal/ Limestone
36	102093003	PRINCE MANUFACTURING COMPANY LIMITED	Lead & Zinc Associated
37	103472008	HTAT YEE LINN MINING & REFINERY COMPANY LIMITED	Gold
38	103600111	MYAY NAGAR MINING COMPANY LIMITED	Lead
39	114804703	THA BYU MINING COMPANY LIMITED	Antimony
40	115122282	YE HTUT KYAW MINING COMPANY LIMITED	Tin & Tungsten
41	106131341	MYANMAR TIN -TUNGSTEN COMPANY LIMITED	Tin & Tungsten
42		Myanmar Yang Tse Copper Ltd	Copper
43	118193601	Eden Energy & Natural Resources Development Co., Ltd	Barite
44	134879211	Kanbawza Industries Ltd	Limestone/ Coal/ Gypsum
45		MYANMAR WANBAO MINING COPPER LTD	Copper
46		HTAR WA YA	
47	108341157	MYANMAR CNMC NICKEL COMPANY LIMITED	Nickel
48	103687241	24 HOUR MINING & INDUSTRY COMPANY LIMITED	Limestone/ Gypsum
49	104959474	A & A NATURAL RESOURCES DEVELOPMENT CO., LTD	Tin & Tungsten
50	108410094	ASIA PHYO MINING COMPANY LIMITED	Limestone
51	111788340	BLUE DIAMOND CEMENT COMPANY LIMITED	Limestone
52	104028462	DAGON MINING COMPANY LIMITED	Coal

N°	Company Reg No	Company	Type of mineral
53	102404661	DIAMOND SHARK MINING COMPANY LIMITED	Tin & Tungsten
54		Directorate of Military office of Chief of Defence Industries, Ministry of Defence	Iron/ Coal/ Limestone
55	129020334	GREEN ASIA COMPANY LIMITED	Coal/ Limestone
56	100706083	GREEN STRATEGIC MINING COMPANY LIMITED	Quartz
57	100430363	GROUP OF FOUR MINING COMPANY LIMITED	Coal
58	105552475	HTUT KHAUNG KYAW MINING COMPANY LIMITED	Coal/ Gold
59	117418820	JUNE CEMENT INDUSTRY LTD.	Granite
60	116551748	LINN PYAE MINING COMPANY LIMITED	Lead & Zinc Associated
61	110744463	LOI CHAI NAGAR MINING COMPANY LIMITED	Coal
62	100784866	MAY FLOWER MINING ENTERPRISES LIMITED	Coal/ Gold
63	114974269	MINING WORLD COMPANY LIMITED	Tin & Tungsten
64	105617070	MOUNT CHING YING MINING COMPANY LIMITED	Lead & Zin Associated/ Marble
65	101715809	MYANMAR APEX MINING CO., LTD	Coal
66	112682317	MYANMAR NAING GROUP MINING COMPANY LTD	Limestone
67	110108567	MYANMAR SIMCO SONG DA JOINT STOK COMPANY LIMITED	Marble
68	116291568	MYINT INVESTMENT GROUP COMPANY LIMITED	Limestone
69		No. (3) Heavy Industry. Ministry Of Industry	Gypsum
70	118049551	SHWE PAUK MINING COMPANY LIMITED	Coal
71	109973629	SHWE PIN LE MINING & INDUSTRY COMPANY LIMITED	Tin & Tungsten
72	116492032	SILVER BRIGHT COMPANY LIMITED	Tin & Tungsten
73	115516027	THE SILVER LION MINING COMPANY LIMITED	Antimony
74	116447428	THIHA THANT HEIN MINING COMPANY LIMITED	Coal
75	102861965	TRIPLE "A" CEMENT INTERNATIONAL COMPANY LIMITED	Gypsum
76	119718384	U E EXPORT IMPORT COMPANY LIMITED	Coal
77	117032973	UNITED CEMENT COMPANY LIMITED	Limestone
78	111029180	YIG COMPANY LIMITED	Coal
79	108744308	YOUNG INVESTMENT GROUP COMPANY LIMITED	Limestone
80	198408573	SEA SUN STAR MINING PRODUCTION & MARKETING COMPANY LIMITED	Copper Associated
81	104449093	ZABU TALU MINING COMPANY LIMITED	Copper Associated
82	100678624	RUBY DRAGON MINING COMPANY LIMITED	Antimony
83	3269/2016-17	HTAY FAMILY COMPANY LIMITED	Antimony
84	106135533	SEIN CHI LIN MINING CO., LTD.	Coal
85	103580234	AUNG HTUN LINN SHEIN WIN MINING & REFINERY COMPANY LIMITED	Gold
86	761/1998-1999	Future Mining Co.,Ltd	Gold
87	761/1998-1999	Future Engineering Gold Mining	Gold
88	103309565	SHWE MYINT THAUNG YINN INDUSTRY & MANUFACTURING COMPANY LIMITED	Gypsum
89	111192928	MYANMAR MYO KO MEDICAL INSTRUMENT COMPANY LIMITED	Iron
90	103798841	SAT WINE INN ARR MINING COMPANY LIMITED	Lead
91	106564965	SHWE SAPAR MINING COMPANY LIMITED	Lead & Zinc, Copper
92	103801990	NAN KANAUNG MINING & ENGINEERING COMPANY LIMITED	Manganese Dioxide
93	101853578	NEW ERA GOLD COMPANY LIMITED	Marble
94	106174911	SHWE PYI NAGAR COMPANY LIMITED	Quartz

For the other companies which made payments below the thresholds presented above, we recommend the disclosure by Government Agencies of the combined benefit stream from the companies in accordance with EITI Requirement 3.

**e. Pearl sector**

**Materiality Analysis**

Due to the limited number of companies (11) in this sector, the MSG decided that all the Pearl companies will be included in the reconciliation scope without applying a materiality threshold.

**Scope decided by the MSG**

The list of companies to be included in the reconciliation scope for the EITI Report for the FY 2017-2018 are as follows:

**Table 114 : List of pearl companies selected in the scope**

Number	License holder
1	Myanmar Tasaki Co., Ltd
2	Myanmar Atlantic Co., Ltd
3	Myanmar Andman Co., Ltd
4	Belpearl Myanmar Co., Ltd
5	Nino Pearl Culturing Co., Ltd
6	Orient Pearl Co., Ltd (Zinyaw)
7	Orient Pearl Co., Ltd (Jalan)
8	Annawar Pearl Co., Ltd (Marine Pearl Company)
9	Pyae Sone Htet Myint Co., Ltd
10	Aquagold Myanmar Co., Ltd
11	Pyae Phyo Tun Co., Ltd

**f. Payments and transfers made by SOEs to Government agencies**

The MSG decided to include all payments and transfers made by SOEs to Government agencies regardless whether they are recorded in the budget accounts or in off-budget accounts.

## 4.4. Selection of Government Agencies

Based on the scoping study of extractive companies and payment flows selected for the 2017-2018 EITI Report, eleven (11) Government Agencies and five (5) SOEs will be required to report the revenues collected from extractive sector as follows:

Government Agencies
General taxation
1. Treasury department (TD)
2. Budget department (BD)
3. The Internal Revenue Department (IRD)
4. The Myanmar Customs Department (MCD)
5. Department of trade (DoT)
Oil and gas sector
1. Ministry of Electricity and Energy (MoEE)
2. Oil and Gas Planning Department (OGPD)
Mining Sector
1. Ministry of Natural Resources and Environmental Conservation (MONREC)
2. Department of Mining (DOM)
3. Department of Geological Survey and Mineral Explorer (DGSE)
Other
1. Ministry of Environmental Conservation and Forestry
SOEs
1. Myanmar Oil and Gas Enterprise (MOGE)
2. N°1 Mining Enterprise (ME1)
3. N°2 Mining Enterprise (ME2)
4. Myanmar Gems Enterprise (MGE)
5. Myanmar Pearl Enterprise (MPE)

## 4.5. Fiscal year

The period covered by the fifth EITI Report for Myanmar is the fiscal year 2017-2018.

Therefore, payment flows and contributions made between 1 April 2017 and 31 March 2018 should be reported by companies and Government Agencies.

The dates to be considered are those mentioned on the flag receipts or the dates of the cheques / bank transfers.



## 4.6. Other information to be disclosed

### Bartering arrangements

According to Requirement 4.3.d of EITI (2016), payments in kind or barters identified during the period covered by this study should be included in the EITI report.

### Other material payments flow

To avoid material omissions, a line entitled "Other significant payments flows" has been included in the reporting template for extractive companies to report any significant payments USD 50,000 including any payment flow which is not shown in the reporting templates.

### Social payments

In accordance with Requirement 6.1 of the EITI Standard, companies are required to disclose social expenditures when mandated by law or contract. Where such benefits are provided in-kind, it is required that companies disclose the nature and deemed value of the in-kind transaction. The beneficiaries and their functions should also be disclosed.

The reconciliation is not possible for social payments due to the various nature of beneficiary that cannot be included in the scope of the reconciliation.

The selected companies will be required to disclose their social payments unilaterally including the following payments flows:

- Mandatory social payments;
- Voluntary social payments;
- The Corporate Social responsibility payments; and
- Contribution to the State/region social development fund

The definition of those payment flows is provided in the section 4.2 of this report.

### Quasi fiscal expenditure

Quasi-fiscal expenditures include arrangements whereby SOE undertake public social expenditure such as payments for social services, public infrastructure, fuel subsidies and national debt servicing, etc. outside of the national budgetary process.

The MSG decided that the SOEs selected in the scope disclose all quasi fiscal expenditure. These payments will be reported unilaterally.

### Loans /Loan guarantee granted to Entities operating in extractive sector

EITI Requirement 3.6 (c) states where the government and SOE(s) have provided loans or loan guarantees to mining, oil and gas companies operating within the country, details on these transactions should be disclosed in the EITI Report. Accordingly, the MSG decided that the reporting entities should disclose loans /Loan guarantee granted by SOE's to entities operating in the extractive sector.

### Production and export

Based on the provisions of Requirement 3 of the EITI Standard (2016), the MSG decided to include the flows and volumes of production and exports in the 2017-2018 report as follows:

- The MSG decided that the reporting entities should report the production data. Production values will be reported on the basis of the cost price. Otherwise, the production value will be reported by the average selling price multiplied by the production of the period; and

- exports volumes and values: the volumes and values of exports will be subject to reporting by reporting entities. The data collected will be reconciled. The export values will be reported on the basis of their FOB prices.

#### **Employment in the extractive sector**

Based on the provisions of Requirement 6 of the EITI Standard, the MSG decided that the staff employed by extractive companies is disclosed, broken down between local employees and expatriates and between men and women.

### **4.7. Reliability and certification of data to be reported**

In order to comply with Requirement No 5 of the EITI Standard (2016) which seeks to guarantee the credibility of the data submitted by reporting entities, the MSG adopted the following approach in the context of the preparation of the 2017-2018 Myanmar EITI report:

#### **For extractive companies**

The Reporting Templates submitted by extractive companies selected in the reconciliation scope should be:

- signed by a person authorised to represent the extractive company;
- supported by detailed receipts of the payments reported; and
- supported by the audit report of the extractive company for the fiscal year 2017-2018.

#### **For Government Agencies**

The Reporting Templates submitted by Government Agencies included in the reconciliation scope must be:

- signed by a person authorised to represent the Government Agency;
- accompanied by detailed receipts of the payments reported; and
- certified by the Auditor General.

### **4.8. Disaggregation level**

The MSG decided that the Reporting Templates and the data are submitted:

- by extractive company;
- by Government Agency; or SOE for each company/taxpayer selected in the reconciliation scope;
- by tax and by type of payment flows as detailed in the Reporting Template ; and
- by project/permit/license...

For each payment flow reported, companies/taxpayers and Government Agencies must produce details by receipt / payment, by date and by beneficiary.

The companies will also be requested to provide the audit report for 2017-2018.

### **4.9. Acceptable margin of error**

For the 2017-18 fiscal year, the acceptable margin of error for reconciliation differences (after adjustments), between the reported payments by extractive companies and the revenue reported by Government Agencies, is 2% of the total extractive revenue reported.

In addition, for the purposes of reconciliation of payment flows, a threshold of **1,500,000 Kyats** is proposed from which a difference requires the collection of the necessary supporting documents from the reporting entities for its analysis and its adjustment.

## 5. RECONCILIATION RESULTS

We present below detailed results of the reconciliation exercise, as well as differences noted between amounts paid by extractive companies and amounts received by Government Agencies. We have highlighted the amounts initially reported and the adjustments made following our reconciliation work, as well as the final amounts and unreconciled differences.

### 5.1. Payments of Oil & Gas companies

#### 5.1.1. Cash flows reconciliation by company

The tables below summarise the differences between the payments reported by extractive companies and receipts reported by Government Agencies.

The tables include consolidated figures based on the reporting templates prepared by each extractive company and Government Agency, adjustments made by us following our reconciliation work and residual, unreconciled differences.

Table 115: Oil and gas payments reconciled by company

*Amounts in MMK*

No.	Company	Templates originally lodged			Adjustments			Final amounts		
		Extractive company	Government	Difference	Extractive company	Government	Difference	Extractive company	Government	Difference
		(a)	(b)	(c) =(a - b)	(d)	€	(f) = (d-e)	(g) = (a+d)	(h) = (b+e)	(i) = (g-h)
1	Gold Petrol Joint Operating Company Inc., (GJOC Inc.)	(14,410,700,217)	(14,183,355,327)	(227,344,890)	67,047,593	(160,298,311)	227,345,904	(14,343,652,624)	(14,343,653,638)	1,014
2	MPRL E&P Pte Ltd. (Yangon Branch )	(14,675,019,330)	(14,675,019,330)	-	-	-	-	(14,675,019,330)	(14,675,019,330)	-
3	PC Myanmar (Hong Kong) Limited	281,235,480,559	297,301,796,151	(16,066,315,592)	(11,288,370)	(16,077,621,327)	16,066,332,957	281,224,192,189	281,224,174,824	17,365
4	Posco Daewoo Corporation (Myanmar E&P Office)	57,901,192,104	264,332,010,339	(206,430,818,235)	204,155,815,541	(2,275,001,467)	206,430,817,008	262,057,007,645	262,057,008,872	(1,227)

No.	Company	Templates originally lodged			Adjustments			Final amounts		
		Extractive company	Government	Difference	Extractive company	Government	Difference	Extractive company	Government	Difference
		(a)	(b)	(c) =(a - b)	(d)	€	(f) = (d-e)	(g) = (a+d)	(h) = (b+e)	(i) = (g-h)
5	PTTEP International Ltd.	(164,272,760,607)	100,828,795,381	(265,101,555,988)	219,820,241,597	(45,281,324,995)	265,101,566,592	55,547,480,990	55,547,470,386	10,604
6	Total E&P Myanmar	331,482,620,774	348,780,362,658	(17,297,741,884)	12,200,828,132	(5,096,913,752)	17,297,741,884	343,683,448,906	343,683,448,906	-
7	Gail JJ India Ltd	-	500,853,775	(500,853,775)	-	-	-	-	500,853,775	(500,853,775)
8	Nippon Oil Exploration (Myanmar) Ltd	-	4,307,263,379	(4,307,263,379)	-	-	-	-	4,307,263,379	(4,307,263,379)
9	ONGC Videsh Ltd.,	-	44,141,968	(44,141,968)	-	(42,111,812)	42,111,812	-	2,030,156	(2,030,156)
10	Unocal Myanmar Offshore Co., Ltd.	15,939,662,340	17,303,141,801	(1,363,479,461)	1,363,479,461	-	1,363,479,461	17,303,141,801	17,303,141,801	-
11	Berlanga Myanmar Pte Ltd., (Myanmar Branch)	1,613,466,561	1,386,474,472	226,992,089	(257,297,561)	-	(257,297,561)	1,356,169,000	1,386,474,472	(30,305,472)
12	BG Exploration & Production Myanmar Pte. Ltd. (Myanmar Branch)	53,960,472	-	53,960,472	(7,324,248)	-	(7,324,248)	46,636,224	-	46,636,224
13	CAOG PTE LTD (MYANMAR BRANCH)	1,449,153,226	617,079	1,448,536,147	(1,448,705,299)	-	(1,448,705,299)	447,927	617,079	(169,152)
14	CFG Energy Pte Ltd.,	1,356,021,300	1,355,820,000	201,300	-	-	-	1,356,021,300	1,355,820,000	201,300
15	ENI Myanmar B.V. (Myanmar Branch)	2,324,493,544	1,355,999,916	968,493,628	(773,865,516)	181,052,705	(954,918,221)	1,550,628,028	1,537,052,621	13,575,407
16	IsTech Energy EP-5 Pte Ltd.,	11,512,519	-	11,512,519	-	881,340	(881,340)	11,512,519	881,340	10,631,179

No.	Company	Templates originally lodged			Adjustments			Final amounts		
		Extractive company	Government	Difference	Extractive company	Government	Difference	Extractive company	Government	Difference
		(a)	(b)	(c) =(a - b)	(d)	€	(f) = (d-e)	(g) = (a+d)	(h) = (b+e)	(i) = (g-h)
17	(Myanmar Branch) Ophir Myanmar (Block AD-3) Limited (Myanmar Branch)	1,804,642	71,540,002	(69,735,360)	-	(71,540,002)	71,540,002	1,804,642	-	1,804,642
18	Pacific Hunt Energy Corporation (Myanmar Branch)	16,548,189,846	-	16,548,189,846	(16,548,189,846)	-	(16,548,189,846)	-	-	-
19	Petronas Carigali Myanmar Inc (PCMI)	4,067,640,000	5,980,120,178	(1,912,480,178)	-	(1,912,480,178)	1,912,480,178	4,067,640,000	4,067,640,000	-
20	Shell Myanmar Energy Pte. Ltd. - Yangon Branch	796,708,353	-	796,708,353	(725,110,047)	-	(725,110,047)	71,598,306	-	71,598,306
21	Tap Energy (M-7) Co., Ltd. (Statoil)	-	37,030,523	(37,030,523)	-	(37,030,523)	37,030,523	-	-	-
22	Woodside Energy (Myanmar) Pte Ltd	35,040,714,479	37,425,263,700	(2,384,549,221)	(3,717,088,708)	(6,101,639,862)	2,384,551,154	31,323,625,771	31,323,623,838	1,933
23	Myanmar Petroleum Exploration & Production Co., Ltd.	-	11,064,522	(11,064,522)	-	-	-	-	11,064,522	(11,064,522)
24	Royal Marine Engineering Co.,Ltd	-	20,412,341	(20,412,341)	-	(4,200,214)	4,200,214	-	16,212,127	(16,212,127)
25	Eden Group Co., Ltd	-	4,978,378,454	(4,978,378,454)	-	(3,811,569,062)	3,811,569,062	-	1,166,809,392	(1,166,809,392)
26	CNPC International Ltd.	-	9,080,670,147	(9,080,670,147)	-	-	-	-	9,080,670,147	(9,080,670,147)

No.	Company	Templates originally lodged			Adjustments			Final amounts		
		Extractive company	Government	Difference	Extractive company	Government	Difference	Extractive company	Government	Difference
		(a)	(b)	(c) =(a - b)	(d)	€	(f) = (d-e)	(g) = (a+d)	(h) = (b+e)	(i) = (g-h)
27	Smart Technical Services Ltd.	-	357,037,151	(357,037,151)	-	(246,328,501)	246,328,501	-	110,708,650	(110,708,650)
28	Machinery and Solutions Co., Ltd.	-	106,763,580	(106,763,580)	-	(57,047,064)	57,047,064	-	49,716,516	(49,716,516)
29	Young Investment Group Co. Ltd.	5,976,250	-	5,976,250	(5,976,250)	-	(5,976,250)	-	-	-
Total		556,470,116,815	1,066,707,182,860	(510,237,066,045)	414,112,566,479	(80,993,173,025)	495,105,739,504	970,582,683,294	985,714,009,835	(15,131,326,541)

## 5.1.2. Payments flows reconciliation by revenue stream

### Payments in kind :

The table below shows the total in kind Payments reported by extractive companies and Government Agencies, taking into account all adjustments:

Table 116 : Oil and gas payments reconciled by payment flow

N°	Description of Payment	Templates originally lodged			Adjustments			Final amounts		
		Extractive company	Govt	Difference	Extractive company	Govt	Difference	Extractive company	Govt	Difference
MOGE										
PCC										
Payments in kind										
1	Baseline payments in kind	748,939	748,939	-	-	-	-	748,939	748,939	-
2	Cost recovery	378,130	378,130	-	-	-	-	378,130	378,130	-
3	Risk compensation	67,273	67,273	-	-	-	-	67,273	67,273	-
IPR										
Payments in kind										
4	Baseline payments in kind	481,182	481,182	-	-	-	-	481,182	481,182	-
5	MOGE profit share (profit split) in kind	72,110	-	72,110	-	-	-	72,110	-	72,110
6	Royalties in kind	43,451	43,451	-	-	-	-	43,451	43,451	-
7	State profit share in kind	-	73,585	(73,585)	-	-	-	-	73,585	(73,585)

### Payments in cash:

The table below shows the total cash Payments reported by extractive companies and Government Agencies, taking into account all adjustments:



Table 116 : Oil and gas payments reconciled by payment flow

Amounts in MMK

N°	Descripti on of Payment	Templates originally lodged			Adjustments			Final amounts		
		Extractive company	Govt	Difference	Extractive company	Govt	Difference	Extractive company	Govt	Difference
Ministry of Planning and Finance (MoPF)										
	Customs Department	-	190,757,692	(190,757,692)	-	(14,877)	14,877	-	190,742,815	(190,742,815)
1	Customs duties (Normal and border imports)	-	190,757,692	(190,757,692)	-	(14,877)	14,877	-	190,742,815	(190,742,815)
	Internal Revenue Department (IRD)	34,013,499,821	111,074,903,183	(77,061,403,362)	(442,712,253)	(62,563,481,862)	62,120,769,609	33,570,787,568	48,511,421,321	(14,940,633,753)
2	Corporate Income Tax	22,717,824,013	50,174,484,096	(27,456,660,083)	10,702,476,476	(1,687,431,514)	12,389,907,990	33,420,300,489	48,487,052,582	(15,066,752,093)
3	Commercial Tax for MOGE contractors sales	50,053,237	60,881,113,526	(60,831,060,289)	(50,053,237)	(60,881,113,526)	60,831,060,289	-	-	-
4	Withholding Tax	4,179,622,681	19,305,561	4,160,317,120	(4,070,939,767)	-	(4,070,939,767)	108,682,914	19,305,561	89,377,353
5	Stamp Duty	41,804,165	-	41,804,165	-	5,063,178	(5,063,178)	41,804,165	5,063,178	36,740,987
6	Other significant payments (> USD 50,000)	7,024,195,725	-	7,024,195,725	(7,024,195,725)	-	(7,024,195,725)	-	-	-
MOGE										
	PSC	498,694,177,924	942,926,962,186	(444,232,784,262)	425,549,115,848	(18,683,695,156)	444,232,811,004	924,243,293,772	924,243,267,030	26,742
	Payments in Cash	498,694,177,924	942,926,962,186	(444,232,784,262)	425,549,115,848	(18,683,695,156)	444,232,811,004	924,243,293,772	924,243,267,030	26,742
7	Domestic sales to the MOGE (-)	(466,558,995,232)	(654,155,961,929)	187,596,966,697	(187,596,966,695)	-	(187,596,966,695)	(654,155,961,927)	(654,155,961,929)	2

N°	Description of Payment	Templates originally lodged			Adjustments			Final amounts		
		Extractive company	Govt	Difference	Extractive company	Govt	Difference	Extractive company	Govt	Difference
8	MOGE Cost recovery	(256,732,572,949)	274,679,114,421	(531,411,687,370)	531,108,989,803	(302,700,469)	531,411,690,272	274,376,416,854	274,376,413,952	2,902
9	MOGE profit share (profit split)	73,833,138,647	99,111,310,383	(25,278,171,736)	23,536,752,337	(1,741,420,595)	25,278,172,932	97,369,890,984	97,369,889,788	1,196
10	Production Bonus	-	-	-	-	-	-	-	-	-
11	Royalties in cash	317,045,861,922	339,352,600,179	(22,306,738,257)	15,887,554,847	(6,419,190,598)	22,306,745,445	332,933,416,769	332,933,409,581	7,188
12	State profit share	831,106,745,536	883,939,899,132	(52,833,153,596)	42,612,785,556	(10,220,383,494)	52,833,169,050	873,719,531,092	873,719,515,638	15,454
PCC		(14,675,019,330)	(14,675,019,330)	-	-	-	-	(14,675,019,330)	(14,675,019,330)	-
Payments in cash		(14,675,019,330)	(14,675,019,330)	-	-	-	-	(14,675,019,330)	(14,675,019,330)	-
16	Cost recovery (-)	(13,561,187,430)	(13,561,187,430)	-	-	-	-	(13,561,187,430)	(13,561,187,430)	-
17	Risk compensation (-)	(1,113,831,900)	(1,113,831,900)	-	-	-	-	(1,113,831,900)	(1,113,831,900)	-
IPR		(17,010,311,602)	(17,010,312,616)	1,014	-	-	-	(17,010,311,602)	(17,010,312,616)	1,014
Payments in cash		(17,010,311,602)	(17,010,312,616)	1,014	-	-	-	(17,010,311,602)	(17,010,312,616)	1,014
18	contractor Cost recovery (-)	(12,699,309,723)	(12,699,309,963)	240	-	-	-	(12,699,309,723)	(12,699,309,963)	240
19	Contractor profit share (-)	(4,311,001,879)	(4,311,002,653)	774	-	-	-	(4,311,001,879)	(4,311,002,653)	774
Common payments to the different type of contracts		55,447,770,002	44,199,891,745	11,247,878,257	(10,993,837,116)	254,018,870	(11,247,855,986)	44,453,932,886	44,453,910,615	22,271
Payments in cash		55,447,770,002	44,199,891,745	11,247,878,257	(10,993,837,116)	254,018,870	(11,247,855,986)	44,453,932,886	44,453,910,615	22,271
20	Signature Bonus	55,182,462,762	44,199,891,745	10,982,571,017	(10,982,548,746)	-	(10,982,548,746)	44,199,914,016	44,199,891,745	22,271
21	Annual expenses	265,307,240	-	265,307,240	(11,288,370)	254,018,870	(265,307,240)	254,018,870	254,018,870	-

N°	Description of Payment	Templates originally lodged			Adjustments			Final amounts		
		Extractive company	Govt	Difference	Extractive company	Govt	Difference	Extractive company	Govt	Difference
	of the Training Fund									
	Social Payments	5,946,884,011	-	5,946,884,011	-	-	-	5,946,884,011	-	5,946,884,011
22	Mandatory Corporate Social Responsibility	362,400	-	362,400	-	-	-	362,400	-	362,400
23	Voluntary Corporate Social Responsibility	5,946,521,611	-	5,946,521,611	-	-	-	5,946,521,611	-	5,946,521,611
	Total	556,470,116,815	1,066,707,182,860	(510,237,066,045)	414,112,566,479	(80,993,173,025)	495,105,739,504	970,582,683,294	985,714,009,835	(15,131,326,541)

### 5.1.3. Adjustments to the reporting templates

#### Adjustments to the companies reporting templates

##### Adjustments per companies

The detail of the adjustments performed to the companies RT detailed per companies is presented below :

Table 117 : Oil and gas companies adjustments by company

Amounts in MMK								
No	Company	Tax paid not reported	Tax paid reported but outside the period covered	Tax paid reported but outside the reconciliation scope	Tax amount incorrectly reported	Payments already supported by the MOGE on the behalf of companies	Tax paid on other identification number	Total Extractive company Adjustments
1	Gold Petrol Joint Operating Company Inc., (GJOC Inc.)	67,047,593	-	-	-	-	-	67,047,593
2	PC Myanmar (Hong Kong) Limited	-	-	(11,288,370)	-	-	-	(11,288,370)
3	Posco Daewoo Corporation (Myanmar E&P Office)	204,155,815,541	-	-	-	-	-	204,155,815,541
4	PTTEP International Ltd.	(152,417,338,741)	(29,365,441,766)	(6,212,280,288)	407,815,302,392	-	-	219,820,241,597

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No.	Company	Tax paid not reported	Tax paid reported but outside the period covered	Tax paid reported but outside the reconciliation scope	Tax amount incorrectly reported	Payments already supported by the MOGE on the behalf of companies	Tax paid on other identification number	Total Extractive company Adjustments
5	Total E&P Myanmar	12,200,828,132	-	-	-	-	-	12,200,828,132
6	Unocal Myanmar Offshore Co., Ltd.	1,363,479,461	-	-	-	-	-	1,363,479,461
7	Berlanga Myanmar Pte Ltd., (Myanmar Branch)	-	-	(173,480,806)	-	(1,055,763)	(82,760,992)	(257,297,561)
8	BG Exploration & Production Myanmar Pte. Ltd. (Myanmar Branch)	-	-	-	-	(7,324,248)	-	(7,324,248)
9	CAOG PTE LTD (MYANMAR BRANCH)	-	-	(71,695,012)	-	(4,277,612)	(1,372,732,675)	(1,448,705,299)
10	ENI Myanmar B.V. (Myanmar Branch)	-	-	(773,865,516)	-	-	-	(773,865,516)
11	Pacific Hunt Energy Corporation (Myanmar Branch)	-	(10,982,548,746)	(5,565,641,100)	-	-	-	(16,548,189,846)
12	Shell Myanmar Energy Pte. Ltd. - Yangon Branch	-	-	(693,690,683)	-	(31,419,364)	-	(725,110,047)
13	Woodside Energy (Myanmar) Pte Ltd	-	-	-	(3,717,088,708)	-	-	(3,717,088,708)
14	Young Investment Group Co. Ltd.	-	-	-	-	(5,976,250)	-	(5,976,250)
	Total	65,369,831,986	(40,347,990,512)	(13,501,941,775)	404,098,213,684	(50,053,237)	(1,455,493,667)	414,112,566,479

### Adjustments per tax

The detail of the adjustments performed to the companies RT detailed per payment flows is presented below :

Table 118 : Oil and gas companies adjustments by payment flows

Amounts in MMK

No.	Revenue stream	Tax paid not reported	Tax paid reported but outside the period covered	Tax paid reported but outside the reconciliation scope	Tax amount incorrectly reported	Payments already supported by the MOGE on the behalf of companies	Tax paid on other identification number	Total Extractive company Adjustments
		65,369,831,986	(40,347,990,512)	(13,501,941,775)	404,098,213,684	(50,053,237)	(1,455,493,667)	414,112,566,479
	Ministry of Planning and Finance (MoPF)	16,914,756,764	-	(13,490,653,405)	(3,717,088,708)	(50,053,237)	(99,673,667)	(442,712,253)
	Internal Revenue Department (IRD)	16,914,756,764	-	(13,490,653,405)	(3,717,088,708)	(50,053,237)	(99,673,667)	(442,712,253)
1	Corporate Income Tax	16,914,756,764	-	(6,212,280,288)	-	-	-	10,702,476,476
2	Commercial Tax for MOGE contractors' sales	-	-	-	-	(50,053,237)	-	(50,053,237)
3	Withholding Tax	-	-	(254,177,392)	(3,717,088,708)	-	(99,673,667)	(4,070,939,767)
4	Other significant payments (> USD 50,000)	-	-	(7,024,195,725)	-	-	-	(7,024,195,725)
	MOGE	48,455,075,222	(40,347,990,512)	(11,288,370)	407,815,302,392	-	(1,355,820,000)	414,555,278,732
	PSC	47,099,255,222	(29,365,441,766)	-	407,815,302,392	-	-	425,549,115,848
	Payments in Cash	47,099,255,222	(29,365,441,766)	-	407,815,302,392	-	-	425,549,115,848
5	Domestic sales to the MOGE ( - )	(187,596,966,695)	-	-	-	-	-	(187,596,966,695)
6	MOGE Cost recovery	123,293,687,411	-	-	407,815,302,392	-	-	531,108,989,803
7	MOGE profit share (profit split)	26,720,501,551	(3,183,749,214)	-	-	-	-	23,536,752,337
8	Royalties in cash	25,957,436,613	(10,069,881,766)	-	-	-	-	15,887,554,847
9	State profit share	58,724,596,342	(16,111,810,786)	-	-	-	-	42,612,785,556
	Common payments to the different type of contracts	1,355,820,000	(10,982,548,746)	(11,288,370)	-	-	(1,355,820,000)	(10,993,837,116)
	Payments in cash	1,355,820,000	(10,982,548,746)	(11,288,370)	-	-	(1,355,820,000)	(10,993,837,116)
10	Signature Bonus	1,355,820,000	(10,982,548,746)	-	-	-	(1,355,820,000)	(10,982,548,746)
11	Annual expenses of the Training Fund	-	-	(11,288,370)	-	-	-	(11,288,370)
	Total	65,369,831,986	(40,347,990,512)	(13,501,941,775)	404,098,213,684	(50,053,237)	(1,455,493,667)	414,112,566,479

## Adjustments to the government reporting templates

### Adjustments per companies

The detail of the adjustments performed to the government agencies RT detailed per companies is presented below:

**Table 119 : Oil and gas government adjustments by companies**

*Amounts in MMK*

No.	Company	Tax received not reported	Tax received reported but outside the period covered	Tax reported but not received	Tax received on other identification number	Payments already supported by the MOGE on the behalf of companies	Total Government Adjustments
1	Gold Petrol Joint Operating Company Inc., (GJOC Inc.)	122,060,829	-	(282,359,140)	-	-	(160,298,311)
2	PC Myanmar (Hong Kong) Limited	30,851,684	-	-	(14,877)	(16,108,458,134)	(16,077,621,327)
3	Posco Daewoo Corporation (Myanmar E&P Office)	42,114,481	-	-	-	(2,317,115,948)	(2,275,001,467)
4	PTTEP International Ltd.	-	(18,683,695,156)	-	(40,872,627)	(26,556,757,212)	(45,281,324,995)
5	Total E&P Myanmar	-	-	-	-	(5,096,913,752)	(5,096,913,752)
6	ONGC Videsh Ltd.,	-	-	-	-	(42,111,812)	(42,111,812)
7	ENI Myanmar B.V. (Myanmar Branch)	181,052,705	-	-	-	-	181,052,705
8	IsTech Energy EP-5 Pte Ltd., (Myanmar Branch)	881,340	-	-	-	-	881,340
9	Ophir Myanmar (Block AD-3) Limited (Myanmar Branch)	-	-	-	-	(71,540,002)	(71,540,002)
10	Petronas Carigali Myanmar Inc (PCMI)	-	-	-	-	(1,912,480,178)	(1,912,480,178)
11	Tap Energy (M-7) Co., Ltd. (Statoil)	-	-	-	-	(37,030,523)	(37,030,523)
12	Woodside Energy (Myanmar) Pte Ltd	4,181,838	-	-	-	(6,105,821,700)	(6,101,639,862)
13	Royal Marine Engineering Co.,Ltd	-	-	-	-	(4,200,214)	(4,200,214)
14	Eden Group Co., Ltd	-	-	-	-	(3,811,569,062)	(3,811,569,062)
15	Smart Technical Services Ltd.	-	-	-	-	(246,328,501)	(246,328,501)
16	Machinery and Solutions Co., Ltd.	-	-	-	-	(57,047,064)	(57,047,064)
	<b>Total</b>	<b>381,142,877</b>	<b>(18,683,695,156)</b>	<b>(282,359,140)</b>	<b>(40,887,504)</b>	<b>(62,367,374,102)</b>	<b>(80,993,173,025)</b>

## Adjustments per tax

The detail of the adjustments performed to the government agencies RT detailed per payment flows is presented below:

Table 120 : Oil and gas government adjustments by payment flows

Amounts in MMK

No.	Revenue stream	Tax received not reported	Tax received reported but outside the period covered	Tax reported but not received	Tax received on other identification number	Payments already supported by the MOGE on the behalf of companies	Total Government Adjustments
		381,142,877	(18,683,695,156)	(282,359,140)	(40,887,504)	(62,367,374,102)	(80,993,173,025)
	Ministry of Planning and Finance (MoPF)	127,124,007	-	(282,359,140)	(40,887,504)	(62,367,374,102)	(62,563,496,739)
	Customs Department	-	-	-	(14,877)	-	(14,877)
1	Customs duties (Normal and border imports)	-	-	-	(14,877)	-	(14,877)
	Internal Revenue Department (IRD)	127,124,007	-	(282,359,140)	(40,872,627)	(62,367,374,102)	(62,563,481,862)
2	Corporate Income Tax	122,060,829	-	(282,359,140)	(40,872,627)	(1,486,260,576)	(1,687,431,514)
3	Commercial Tax for MOGE contractors' sales	-	-	-	-	(60,881,113,526)	(60,881,113,526)
4	Stamp Duty	5,063,178	-	-	-	-	5,063,178
	MOGE	254,018,870	(18,683,695,156)	-	-	-	(18,429,676,286)
	PSC	-	(18,683,695,156)	-	-	-	(18,683,695,156)
	Payments in Cash	-	(18,683,695,156)	-	-	-	(18,683,695,156)
5	MOGE Cost recovery	-	-	-	-	-	(302,700,469)
6	MOGE profit share (profit split)	-	(2,044,121,064)	-	-	-	(1,741,420,595)
7	Royalties in cash	-	(6,419,190,598)	-	-	-	(6,419,190,598)
8	State profit share	-	(10,220,383,494)	-	-	-	(10,220,383,494)
	Common payments to the different type of contracts	254,018,870	-	-	-	-	254,018,870
	Payments in cash	254,018,870	-	-	-	-	254,018,870
9	Annual expenses of the Training Fund	254,018,870	-	-	-	-	254,018,870
	Total	381,142,877	(18,683,695,156)	(282,359,140)	(40,887,504)	(62,367,374,102)	(80,993,173,025)

### 5.1.4. Unreconciled discrepancies

Following our adjustments made, the total unreconciled discrepancies amounted to MMK (15,131,328,016) representing (1.53%) of total payments reported by Government Bodies. These unreconciled differences are summarised below:

**Unreconciled discrepancies per company:**

**Table 121 : Unreconciled discrepancies per company**

			<i>Amounts in MMK</i>			
No.	Company	Unreconciled difference	Reporting template not submitted by the extractive company	Tax not reported by the extractive company	Tax not reported by the Govt Body	Not material difference
1	Shell Myanmar Energy Pte. Ltd. - Yangon Branch	71,598,306	-	-	71,598,306	-
2	BG Exploration & Production Myanmar Pte. Ltd. (Myanmar Branch)	46,636,224	-	-	46,636,224	-
3	ENI Myanmar B.V. (Myanmar Branch)	13,575,407	-	(179,916)	13,755,323	-
4	IsTech Energy EP-5 Pte Ltd., (Myanmar Branch)	10,631,179	-	-	10,631,179	-
5	Ophir Myanmar (Block AD-3) Limited (Myanmar Branch)	1,804,642	-	-	1,804,642	-
6	CFG Energy Pte Ltd.,	201,300	-	-	201,300	-
7	PC Myanmar (Hong Kong) Limited	17,365	-	-	-	17,365
8	PTTEP International Ltd.	10,604	-	-	-	10,604
9	Woodside Energy (Myanmar) Pte Ltd	1,933	-	-	-	1,933
10	Gold Petrol Joint Operating Company Inc., (GJOC Inc.)	1,014	-	-	-	1,014
11	Posco Daewoo Corporation (Myanmar E&P Office)	(1,227)	-	-	-	(1,227)
12	CAOG PTE LTD (MYANMAR BRANCH)	(169,152)	-	(617,079)	447,927	-
13	ONGC Videsh Ltd.,	(2,030,156)	(2,030,156)	-	-	-
14	Myanmar Petroleum Exploration & Production Co., Ltd.	(11,064,522)	-	(11,064,522)	-	-
15	Royal Marine Engineering Co.,Ltd	(16,212,127)	(16,212,127)	-	-	-
16	Berlanga Myanmar Pte Ltd., (Myanmar Branch)	(30,305,472)	-	(30,325,810)	-	20,338
17	Machinery and Solutions Co., Ltd.	(49,716,516)	(49,716,516)	-	-	-
18	Smart Technical Services Ltd.	(110,708,650)	(110,708,650)	-	-	-
19	Gail JJ India Ltd	(500,853,775)	(500,853,775)	-	-	-
20	Eden Group Co., Ltd	(1,166,809,392)	(1,166,809,392)	-	-	-
21	Nippon Oil Exploration (Myanmar) Ltd	(4,307,263,379)	(4,307,263,379)	-	-	-



No.	Company	Unreconciled difference	Reporting template not submitted by the extractive company	Tax not reported by the extractive company	Tax not reported by the Govt Body	Not material difference
22	CNPC International Ltd.	(9,080,670,147)	(9,080,670,147)	-	-	-
	Total	(15,131,326,541)	(15,234,264,142)	(42,187,327)	145,074,901	50,027

### Reporting template not submitted by the extractive company:

8 companies did not submit their reporting templates and for which government agencies reported payments. Those companies are :

<i>Amounts in MMK</i>	
Company	Amount reported by the government agencies
CNPC International Ltd.	(9,080,670,147)
Nippon Oil Exploration (Myanmar) Ltd	(4,307,263,379)
Eden Group Co., Ltd	(1,166,809,392)
Gail JJ India Ltd	(500,853,775)
Smart Technical Services Ltd.	(110,708,650)
Machinery and Solutions Co., Ltd.	(49,716,516)
Royal Marine Engineering Co.,Ltd	(16,212,127)
ONGC Videsh Ltd.,	(2,030,156)
Total	(15,234,264,142)

## Unreconciled discrepancies per tax :

### In kind payments:

Table 122 : Unreconciled discrepancies per tax in kind

No.	Revenue Stream	Unreconciled difference	Discrepancies explanations			
			Reporting template not submitted by the extractive company	Tax not reported by the extractive company	Tax not reported by the Govt Body	Not material difference
MOGE		48,552	-	(73,585)	72,110	50,027
IPR		(461)	-	(73,585)	72,110	1,014
Payments in kind		(1,475)	-	(73,585)	72,110	-
10	MOGE profit share (profit split) in kind	72,110	-	-	72,110	-
11	State profit share in kind	(73,585)	-	(73,585)	-	-

### Tax not reported by the extractive company

The discrepancies regarding the payment in kind is due to the following reason:

- MOGE reported a payment of 73,585 bbl as State profit share in kind
- The company GOLDPETROL JOC. Inc. reported a payment of 72 110 bbl as profit share (profit split) in kind

### In cash payments:

Table 123 : Unreconciled discrepancies per tax in cash

No.	Revenue Stream	Unreconciled difference	Discrepancies explanations			
			Reporting template not submitted by the extractive company	Tax not reported by the extractive company	Tax not reported by the Govt Body	Not material difference
		(15,131,328,016)	(15,234,264,142)	(42,260,912)	145,147,011	50,027
	Ministry of Planning and Finance (MoPF)	(15,131,376,568)	(15,234,264,142)	(42,187,327)	145,074,901	-

Amounts in MMK

			Discrepancies explanations			
No.	Revenue Stream	Unreconciled difference	Reporting template not submitted by the extractive company	Tax not reported by the extractive company	Tax not reported by the Govt Body	Not material difference
Customs Department		(190,742,815)	(179,498,377)	(11,244,438)	-	
1	Customs duties (Normal and border imports)	(190,742,815)	(179,498,377)	(11,244,438)	-	-
Internal Revenue Department (IRD)		(14,940,633,753)	(15,054,765,765)	(30,942,889)	145,074,901	-
2	Corporate Income Tax	(15,066,752,093)	(15,035,460,204)	(31,291,889)	-	-
3	Withholding Tax	89,377,353	(19,305,561)	-	108,682,914	-
4	Stamp Duty	36,740,987	-	349,000	36,391,987	-
MOGE		48,552	-	(73,585)	72,110	50,027
PSC		26,742	-	-	-	26,742
Payments in Cash		26,742	-	-	-	26,742
5	Domestic sales to the MOGE ( - )	2	-	-	-	2
6	MOGE Cost recovery	2,902	-	-	-	2,902
7	MOGE profit share (profit split)	1,196	-	-	-	1,196
8	Royalties in cash	7,188	-	-	-	7,188
9	State profit share	15,454	-	-	-	15,454
IPR		(461)	-	(73,585)	72,110	1,014
Payments in cash		1,014	-	-	-	1,014
12	contractor Cost recovery (-)	240	-	-	-	240
13	Contractor profit share (-)	774	-	-	-	774
Common payments to the different type of contracts		22,271	-	-	-	22,271
Payments in cash		22,271	-	-	-	22,271
14	Signature Bonus	22,271	-	-	-	22,271
Total		(15,131,326,541)	(15,234,264,142)	(42,187,327)	145,074,901	50,027

#### Reporting template not submitted by the extractive company :

The payment flows of the companies that did not submit their reporting templates listed above are mainly composed of the payments of corporate income tax for 15,035,460,204 MMK, customs duties for 179,498,377 MMK and withholding tax for 19,305,561 MMK.

## 5.2. Payments of Gems and Jade companies

### 5.2.1. Cash flows reconciliation by company

#### For Companies in scope:

The tables below summarise the differences between payments reported by extractive companies and receipts reported by Government Agencies.

The tables include consolidated figures based on the reporting templates prepared by each extractive company and Government Agency, adjustments made following our reconciliation work and the residual, unreconciled differences:

**Table 124: Gems and Jade payments reconciliation per company**

*Amounts in MMK*

Company	Templates originally lodged			Adjustments			Final amounts		
	Extractive company (a)	Government (b)	Difference (c) = (a - b)	Extractive company (d)	Government €	Difference (f) = (d-e)	Extractive company (g) = (a+d)	Government (h) = (b+e)	Difference (i) = (g-h)
Linn Lett Win Yadanar Gems Co Ltd	36,979,696,968	37,223,464,814	(243,767,846)	278,258,703	42,932,419	235,326,284	37,257,955,671	37,266,397,233	(8,441,562)
Yar Za Htar Ni	32,482,335,147	32,034,040,992	448,294,155	591,920	448,886,202	(448,294,282)	32,482,927,067	32,482,927,194	(127)
YADANAR TAUNG TEN	21,860,448,263	23,817,029,166	(1,956,580,903)	1,956,580,903	-	1,956,580,903	23,817,029,166	23,817,029,166	-
Wai Aung Gabar	23,125,056,609	23,125,056,624	(16)	-	-	-	23,125,056,609	23,125,056,624	(16)
Ayeyar Yadanar Gems & Jewellery Co., Ltd	4,096,010,058	4,137,651,754	(41,641,696)	241,961,052	200,319,565	41,641,487	4,337,971,110	4,337,971,319	(209)
A K N K	-	43,957,340	(43,957,340)	-	-	-	-	43,957,340	(43,957,340)
SILVER ELEPHANT GEMS CO LTD	20,570,667,536	11,017,063,347	9,553,604,189	(9,556,297,060)	-	(9,556,297,060)	11,014,370,476	11,017,063,347	(2,692,872)
Phyo Thiha Kyaw	10,351,491,965	13,776,295,452	(3,424,803,487)	-	(3,424,693,487)	3,424,693,487	10,351,491,965	10,351,601,965	(110,000)
Same Wai Hlaing	8,877,127,349	8,877,127,349	-	-	-	-	8,877,127,349	8,877,127,349	-

Company	Templates originally lodged			Adjustments			Final amounts		
	Extractive company (a)	Government (b)	Difference (c) =(a - b)	Extractive company (d)	Government €	Difference (f) = (d-e)	Extractive company (g) = (a+d)	Government (h) = (b+e)	Difference (i) = (g-h)
Mya Garden	8,332,306,202	8,328,661,018	3,645,184	-	12,969,969	(12,969,969)	8,332,306,202	8,341,630,987	(9,324,785)
Kan Pwint Oo	6,875,269,107	6,203,345,545	671,923,562	(671,923,562)	-	(671,923,562)	6,203,345,545	6,203,345,545	-
Shwe Ngar Koe Kaung	349,936,252	349,936,252	-	-	-	-	349,936,252	349,936,252	-
Shwe Gaung Gaung Gems Co Ltd	2,850,505,388	2,930,849,587	(80,344,199)	83,510,575	3,031,121	80,479,454	2,934,015,962	2,933,880,708	135,254
Htun Tauk Zabu Gems & Jewellery Co;Ltd.	2,413,813,506	2,878,564,069	(464,750,563)	436,572,092	(28,305,468)	464,877,560	2,850,385,598	2,850,258,601	126,997
Sein Lonm Taung Tan	6,180,094,190	7,993,029,438	(1,812,935,248)	1,810,518,135	-	1,810,518,135	7,990,612,324	7,993,029,438	(2,417,114)
Ayar Jade	6,955,340,026	7,012,369,297	(57,029,270)	56,842,573	64,100	56,778,473	7,012,182,599	7,012,433,397	(250,797)
Shinning Star Light Gems & Jewellery Co.,Ltd	5,974,017,581	6,158,061,678	(184,044,097)	78,798,023	-	78,798,023	6,052,815,604	6,158,061,678	(105,246,074)
Yadanar Sin Thiri Gems Co	798,596,138	515,918,173	282,677,965	(203,040,427)	81,053,202	(284,093,629)	595,555,711	596,971,375	(1,415,663)
SHWE OAK KHAI MINING CO.,LTD.	3,136,460,200	2,637,271,150	499,189,050	(499,189,050)	-	(499,189,050)	2,637,271,150	2,637,271,150	-
Jade Mountain	5,423,953,001	5,350,582,685	73,370,317	1,587,462	74,957,781	(73,370,319)	5,425,540,463	5,425,540,466	(2)
Thirawmani	7,910,586,895	5,661,998,671	2,248,588,224	(2,246,976,132)	833,991	(2,247,810,123)	5,663,610,762	5,662,832,662	778,100
Phoe Thar Htoo Gems Co.,Ltd.	4,832,256,604	4,781,219,654	51,036,950	3,035,324	59,313,865	(56,278,542)	4,835,291,927	4,840,533,519	(5,241,592)
Myanma Seinn Lei Aung Gems Co Ltd.	1,772,439,205	2,504,042,143	(731,602,938)	105,777,302	(604,066,348)	709,843,651	1,878,216,508	1,899,975,795	(21,759,287)
Yadanar Yaung Chi	1,070,086,981	1,008,689,069	61,397,913	(0)	40,373,466	(40,373,466)	1,070,086,981	1,049,062,535	21,024,447

Company	Templates originally lodged			Adjustments			Final amounts		
	Extractive company (a)	Government (b)	Difference (c) = (a - b)	Extractive company (d)	Government €	Difference (f) = (d-e)	Extractive company (g) = (a+d)	Government (h) = (b+e)	Difference (i) = (g-h)
Linn Htet Aung Gems Co., Ltd.	391,819,051	406,717,661	(14,898,610)	54,858,501	39,959,890	14,898,610	446,677,552	446,677,552	-
Norbal Three Star	5,616,386,762	5,770,900,332	(154,513,570)	154,099,461	-	154,099,461	5,770,486,223	5,770,900,332	(414,109)
WAN BROTHERS	5,492,778,978	5,426,331,914	66,447,064	(66,447,064)	-	(66,447,064)	5,426,331,914	5,426,331,914	-
Mya Yaung Tun	80,454,319	89,310,279	(8,855,960)	8,811,300	-	8,811,300	89,265,619	89,310,279	(44,660)
Nan Htike Pyae Paing Co	690,517,039	680,427,121	10,089,918	-	-	-	690,517,039	680,427,121	10,089,918
Khun Paooe	4,985,156,178	5,206,466,092	(221,309,914)	219,983,726	-	219,983,726	5,205,139,903	5,206,466,092	(1,326,189)
Great wall Gems&Jade company	203,405,293	61,928,464	141,476,829	-	143,476,829	(143,476,829)	203,405,293	205,405,293	(2,000,000)
Great Genesis Gems	5,553,989,650	6,354,377,886	(800,388,236)	64,227,119	(736,161,117)	800,388,236	5,618,216,769	5,618,216,769	-
Wai Family	3,125,092,116	3,125,092,116	-	-	-	-	3,125,092,116	3,125,092,116	-
Seng Tawng Gems&Jewellery Co., Ltd	2,094,292,043	2,094,293,154	(1,111)	-	-	-	2,094,292,043	2,094,293,154	(1,111)
Kyauk Same Nan Taw	2,904,292,485	2,904,292,485	-	-	-	-	2,904,292,485	2,904,292,485	-
Jade Land	-	991,522	(991,522)	-	-	-	-	991,522	(991,522)
1 1 1	2,478,967,585	2,397,523,013	81,444,573	20,000,000	105,652,066	(85,652,066)	2,498,967,585	2,503,175,079	(4,207,493)
Kaung Myat Thu Ka	3,530,878,949	3,458,252,247	72,626,702	2,926,550	100,882,447	(97,955,897)	3,533,805,499	3,559,134,694	(25,329,195)
Khine Myanmar	358,747,261	203,601,921	155,145,341	(121,678,086)	36,047,242	(157,725,328)	237,069,176	239,649,163	(2,579,987)
Unity	1,872,763,608	1,520,654,927	352,108,681	(353,512,334)	68,102	(353,580,436)	1,519,251,275	1,520,723,030	(1,471,755)
Wai Yan Thar	80,661,952	46,285,247	34,376,705	(34,376,705)	-	(34,376,705)	46,285,247	46,285,247	-
Sin Gaung Taung	671,678,048	27,035,087	644,642,961	(644,642,961)	-	(644,642,961)	27,035,087	27,035,087	0
GREEN MOUNTAIN CO;LTD	2,031,899,863	2,360,710,639	(328,810,776)	1,251,534,951	923,980,739	327,554,213	3,283,434,814	3,284,691,378	(1,256,563)

Company	Templates originally lodged			Adjustments			Final amounts		
	Extractive company (a)	Government (b)	Difference (c) = (a - b)	Extractive company (d)	Government €	Difference (f) = (d-e)	Extractive company (g) = (a+d)	Government (h) = (b+e)	Difference (i) = (g-h)
Chang Long Gems & Jewellery Co Ltd	1,770,389,259	1,839,463,739	(69,074,480)	-	-	-	1,770,389,259	1,839,463,739	(69,074,480)
Kyaut Myat Min	101,424,810	101,937,664	(512,853)	-	-	-	101,424,810	101,937,664	(512,853)
Yadanar Shwe Ye Win	480,429,111	478,785,213	1,643,898	-	2,061,279	(2,061,279)	480,429,111	480,846,492	(417,381)
Myit Sone Ayar	1,951,196,181	1,934,790,604	16,405,577	1,552,796	17,965,123	(16,412,327)	1,952,748,977	1,952,755,727	(6,750)
Yadanar Aung Chan	41,707,603	83,484,428	(41,776,825)	-	(34,314,620)	34,314,620	41,707,603	49,169,808	(7,462,205)
Myanmar Imperial Jade Co	4,293,147,277	4,470,869,601	(177,722,324)	183,258,280	5,535,956	177,722,324	4,476,405,557	4,476,405,557	-
Khin Zaw Aung & Brother	3,540,585,962	3,547,071,509	(6,485,547)	11,591,460	6,252,690	5,338,771	3,552,177,422	3,553,324,198	(1,146,776)
Myanmar First Gems & Jewellery Co Ltd	3,174,937,381	3,172,508,397	2,428,984	(2,428,984)	-	(2,428,984)	3,172,508,397	3,172,508,397	-
Ever Winner	593,421,070	995,186,489	(401,765,419)	10,834,463	(390,930,956)	401,765,419	604,255,533	604,255,533	-
Shwe Hein Htet Gems Co Ltd	1,201,385,898	1,035,533,036	165,852,862	-	165,852,862	(165,852,862)	1,201,385,898	1,201,385,898	-
Myo Nwe Gems	2,130,859,240	2,348,111,828	(217,252,588)	240,148,126	23,057,787	217,090,339	2,371,007,366	2,371,169,615	(162,249)
Tun Naing Aung	992,846,715	1,571,144,920	(578,298,205)	168,215,193	(409,604,314)	577,819,507	1,161,061,908	1,161,540,607	(478,699)
Nay Min Kabar Co	1,353,880,234	2,338,281,265	(984,401,031)	-	(984,401,025)	984,401,025	1,353,880,234	1,353,880,240	(6)
Zebu Thiri Gems Co.,Ltd	654,471,651	658,573,979	(4,102,327)	-	-	-	654,471,651	658,573,979	(4,102,327)
Yadanar Three Elephants Co	2,568,497,691	2,851,709,145	(283,211,454)	311,468,294	21,056,912	290,411,382	2,879,965,985	2,872,766,057	7,199,928
Kyaing International	345,465,884,569	2,948,553,219	342,517,331,350	(342,593,515,064)	-	(342,593,515,064)	2,872,369,506	2,948,553,219	(76,183,713)

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Nan Oo Yadamar	192,947,578	172,373,206	20,574,372	1,696,460	22,477,746	(20,781,286)	194,644,038	194,850,952	(206,914)
Su Htu Pan	156,443,265	158,326,959	(1,883,694)	(69,739)	-	(69,739)	156,373,526	158,326,959	(1,953,433)
Long Byit	129,242,273	102,067,199	27,175,074	(66,908,163)	-	(66,908,163)	62,334,110	102,067,199	(39,733,089)
Win Lei Yadamar	56,576,007	120,247,662	(63,671,655)	63,648,850	-	63,648,850	120,224,857	120,247,662	(22,805)
Kyal Sin Phyu	11,638,509	23,697,825	(12,059,315)	-	-	-	11,638,509	23,697,825	(12,059,315)
Treasure Star Co., Ltd	1,210,280,978	1,305,732,474	(95,451,496)	115,208,215	20,000,000	95,208,215	1,325,489,193	1,325,732,474	(243,281)
ARS Gems	495,108,897	280,920,054	214,188,843	(216,608,583)	346,938	(216,955,521)	278,500,314	281,266,992	(2,766,678)
Yadamar Pyi Phyo Aung Gems Co., Ltd	241,874,729	396,845,158	(154,970,429)	158,111,183	8,982,310	149,128,874	399,985,913	405,827,468	(5,841,555)
Jade Padatar Gems Co.,Ltd	1,205,460,960	1,357,132,253	(151,671,293)	151,668,504	-	151,668,504	1,357,129,464	1,357,132,253	(2,788)
Ruby Dragon Company	1,171,985,650	1,159,991,766	11,993,884	29,824,479	3,884,508	25,939,971	1,201,810,129	1,163,876,274	37,933,855
Northern Jade World	2,048,974,000	-	2,048,974,000	(2,048,974,000)	-	(2,048,974,000)	-	-	-
Kaung Htet Khaing	61,156,968	61,156,968	-	-	-	-	61,156,968	61,156,968	-
Kaung Swan Htet Co	1,593,654,885	1,574,911,021	18,743,864	(3,882,185)	14,075,479	(17,957,664)	1,589,772,700	1,588,986,500	786,200
Shwe Ywat Hlwar	172,936,632	136,193,138	36,743,495	-	37,914,026	(37,914,026)	172,936,632	174,107,164	(1,170,531)
Same Lei Yadamar Win Co	3,477,221,127	2,215,486,384	1,261,734,743	(1,261,734,743)	-	(1,261,734,743)	2,215,486,384	2,215,486,384	-
Hpakan King Gems & Jewellery Co. Ltd	50,354,783	51,667,704	(1,312,921)	-	-	-	50,354,783	51,667,704	(1,312,921)
Agga Yadamar Jade Gems & Jewellery Co., LTD	1,662,437,551	1,732,656,333	(70,218,782)	124,156,720	53,994,483	70,162,237	1,786,594,270	1,786,650,816	(56,545)



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Shwe War Myae	17,443,984	49,936,003	(32,492,019)	32,491,320	-	32,491,320	49,935,304	49,936,003	(698)
Delta Land	943,833,055	176,735,526	767,097,529	(766,992,283)	-	(766,992,283)	176,840,772	176,735,526	105,246
Seine Lone Aung	38,468,373	38,468,373	-	-	-	-	38,468,373	38,468,373	-
Aung Hein Minn	629,709,449	577,026,314	52,683,135	(57,683,970)	(4,988,262)	(52,695,708)	572,025,480	572,038,053	(12,573)
Kyauk Seinn Sun Shwin Jade Gems & Jewellery Co Ltd	3,015,481,523	1,875,507,984	1,139,973,540	(1,139,973,540)	-	(1,139,973,540)	1,875,507,984	1,875,507,984	-
Yadanar Aung Tun Tauk	55,253,103	52,995,058	2,258,045	-	2,258,045	(2,258,045)	55,253,103	55,253,103	-
U YA GEMS	3,751,347,085	1,834,595,880	1,916,751,205	(1,798,455,412)	118,024,930	(1,916,480,342)	1,952,891,672	1,952,620,810	270,862
Chaow Brothers Gemstone Enterprise Ltd	461,353,002	1,018,796,469	(557,443,467)	557,443,467	-	557,443,467	1,018,796,469	1,018,796,469	-
Myat Yamon	1,917,869,095	1,996,588,578	(78,719,482)	103,016,790	26,094,963	76,921,827	2,020,885,886	2,022,683,541	(1,797,655)
Nay La Pwint	1,200,402,053	1,196,339,668	4,062,386	2,937,567	7,000,000	(4,062,433)	1,203,339,620	1,203,339,668	(48)
Ma Li Kha Gem Stone Co	340,644,429	715,109,256	(374,464,827)	37,833,590	-	37,833,590	378,478,019	715,109,256	(336,631,237)
Wan Full	16,786,147	56,537,201	(39,751,054)	25,834,877	-	25,834,877	42,621,024	56,537,201	(13,916,177)
Aung Tu Ka Dana	-	3,920,400	(3,920,400)	-	-	-	-	3,920,400	(3,920,400)
Yadanar Moe Myay	247,640,474	165,097,247	82,543,228	90,225	82,231,844	(82,141,619)	247,730,699	247,329,091	401,609
Shein Family gems Co., Ltd.	75,406,369	64,864,948	10,541,421	-	6,579,804	(6,579,804)	75,406,369	71,444,752	3,961,617
Thein Gabar Aung	223,145,919	100,030,622	123,115,297	(74,574,660)	48,758,188	(123,332,848)	148,571,259	148,788,810	(217,551)
Jade Treasure	575,768,767	301,163,174	274,605,594	(255,878,958)	-	(255,878,958)	319,889,810	301,163,174	18,726,636

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Lawka Nandar	637,923,891	783,224,238	(145,300,347)	-	(137,236,814)	137,236,814	637,923,891	645,987,424	(8,063,532)
Ngwe Si Hein	410,790,339	369,523,493	41,266,846	-	-	-	410,790,339	369,523,493	41,266,846
Myat Pan Khaing	1,757,603,431	1,757,574,857	28,574	-	-	-	1,757,603,431	1,757,574,857	28,574
Lon Hai	-	8,313,540	(8,313,540)	-	-	-	-	8,313,540	(8,313,540)
Goldend Light gems	223,149,013	263,325,385	(40,176,372)	-	2,957,031	(2,957,031)	223,149,013	266,282,416	(43,133,403)
Hein Aung Lin Htet Jade Co. Ltd	191,111,922	222,427,286	(31,315,363)	-	-	-	191,111,922	222,427,286	(31,315,363)
Phar Kant Sai Bon	-	12,053,265	(12,053,265)	-	-	-	-	12,053,265	(12,053,265)
Thigi Myintzu Yadanar	322,458,549	95,112,824	227,345,724	(72,485,193)	84,083,020	(156,568,213)	249,973,355	179,195,844	70,777,511
Seinn Nay Chi Gems & jade company	1,769,908,266	2,522,114,382	(752,206,116)	-	-	-	1,769,908,266	2,522,114,382	(752,206,116)
Seine Light	-	101,935,390	(101,935,390)	-	-	-	-	101,935,390	(101,935,390)
New Lucky Green Gems	22,550,308	20,896,065	1,654,243	-	1,705,042	(1,705,042)	22,550,308	22,601,107	(50,799)
Mya San Dar	2,772,994	2,772,994	-	-	-	-	2,772,994	2,772,994	-
Jade Thazin	150,023,470	231,221,887	(81,198,418)	-	-	-	150,023,470	231,221,887	(81,198,418)
Kaung Su Aung	740,042,651	2,172,775,951	(1,432,733,300)	67,189,154	(557,943,762)	625,132,916	807,231,804	1,614,832,189	(807,600,384)
Kachin National Development	713,201,538	724,225,194	(11,023,656)	-	(11,023,616)	11,023,616	713,201,538	713,201,578	(40)
Jade Thapyae Co., Ltd	39,216,341	40,507,815	(1,291,474)	-	-	-	39,216,341	40,507,815	(1,291,474)
Kaung Wai Yan Co	75,599,699	167,602,381	(92,002,682)	-	-	-	75,599,699	167,602,381	(92,002,682)
Green Diamond Gems & Jewellery Co. Ltd	113,228,080	101,551,123	11,676,957	-	11,676,944	(11,676,944)	113,228,080	113,228,067	13

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Lucky Star Jade Group	343,171,705	212,967,289	130,204,416	29,153,302	158,817,600	(129,664,298)	372,325,007	371,784,889	540,118
Yadanar Si	5,000,000	14,516,160	(9,516,160)	-	-	-	5,000,000	14,516,160	(9,516,160)
All Right Company	179,237,699	179,843,721	(606,022)	-	-	-	179,237,699	179,843,721	(606,022)
Jewel Crown Company	661,271,446	426,182,150	235,089,296	(230,771,576)	4,317,720	(235,089,296)	430,499,870	430,499,870	-
Kaung Mon Yadanar	60,575,733	108,777,498	(48,201,765)	(40,314)	-	(40,314)	60,535,418	108,777,498	(48,242,079)
Global Sun Light	112,734,873	111,441,681	1,293,192	-	-	-	112,734,873	111,441,681	1,293,192
Aung Hlaing Kyawlwa	1,506,544	98,338	1,408,206	-	-	-	1,506,544	98,338	1,408,206
Value Standard	818,324,700	693,800,754	124,523,946	-	124,963,957	(124,963,957)	818,324,700	818,764,711	(440,011)
Seine Aung	772,550,796	772,550,209	587	-	-	-	772,550,796	772,550,209	587
Myint Shin Gems Co.,LTd	1,914,971	1,914,971	-	-	-	-	1,914,971	1,914,971	-
U Kyaw Thet	1,301,741,629	1,302,149,861	(408,232)	-	-	-	1,301,741,629	1,302,149,861	(408,232)
Buu Gar	-	248,820	(248,820)	-	-	-	-	248,820	(248,820)
Jade Pioneer Mining Limited	10,090,523	11,438,889	(1,348,366)	-	-	-	10,090,523	11,438,889	(1,348,366)
Kyauk Seinn Minn Gems	520,475,973	536,706,693	(16,230,720)	-	-	-	520,475,973	536,706,693	(16,230,720)
Yi Li Fa	10,272,703	1,324,103,474	(1,313,830,770)	-	-	-	10,272,703	1,324,103,474	(1,313,830,770)
Pyi Yadanar	1,231,539,336	1,232,539,336	(1,000,000)	-	-	-	1,231,539,336	1,232,539,336	(1,000,000)
MELODIOUS GEMS COMPANY LIMITED	108,468,151	108,468,151	-	-	-	-	108,468,151	108,468,151	-
Myanmar Thura	2,427,532,589	1,308,244,318	1,119,288,271	(855,542,693)	263,026,219	(1,118,568,912)	1,571,989,895	1,571,270,537	719,358
Nay Chi Yadanar Co., Ltd.	448,317,118	481,363,474	(33,046,356)	-	46,518,095	(46,518,095)	448,317,118	527,881,569	(79,564,451)

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Kyauk Seinn Wingabar Jade Gems & Jewellery Co.,Ltd	1,459,903,724	842,278,060	617,625,664	(617,580,695)	-	(617,580,695)	842,323,029	842,278,060	44,970
Ou Ryu Sein Yadanar	13,180,111	13,180,111	-	-	-	-	13,180,111	13,180,111	-
Kaung Htike	-	6,810,780	(6,810,780)	-	-	-	-	6,810,780	(6,810,780)
Sein Minn Yadanar	10,821,439	10,821,661	(222)	-	-	-	10,821,439	10,821,661	(222)
Treasure Five Star Co., Ltd	-	1,000,220	(1,000,220)	-	-	-	-	1,000,220	(1,000,220)
Kyei Linn Gems & Jade Company	2,576,707	4,576,707	(2,000,000)	-	-	-	2,576,707	4,576,707	(2,000,000)
Silver Sand Stone Gems co.,	210,511,732	210,511,732	-	-	-	-	210,511,732	210,511,732	-
Wan Chang	23,682,297	25,610,942	(1,928,645)	-	-	-	23,682,297	25,610,942	(1,928,645)
Khaing Lon Gems Co., Ltd	951,697,833	978,313,265	(26,615,432)	26,615,432	-	26,615,432	978,313,265	978,313,265	-
PON TUNG THARR GEMS COMPANY LIMITED	390,195,202	406,952,477	(16,757,275)	-	-	-	390,195,202	406,952,477	(16,757,275)
Treasure Linn Gems Co.,Ltd	74,126,774	61,304,436	12,822,339	-	12,061,922	(12,061,922)	74,126,774	73,366,358	760,417
Treasure White Lotus	191,839,794	164,308,805	27,530,989	-	14,767,671	(14,767,671)	191,839,794	179,076,476	12,763,318
Sein Thura San	1,079,675,060	1,095,771,854	(16,096,794)	-	-	-	1,079,675,060	1,095,771,854	(16,096,794)
Aung Shwe Kabar	50,921,786	28,134,869	22,786,916	(22,626,000)	-	(22,626,000)	28,295,786	28,134,869	160,917
San Taw Win	894,507,116	895,147,124	(640,008)	-	-	-	894,507,116	895,147,124	(640,008)
Jade Crystal Palace	6,766,920	6,766,920	-	-	-	-	6,766,920	6,766,920	-
Aung Myin Thu Gems &	396,870,964	403,039,857	(6,168,893)	-	-	-	396,870,964	403,039,857	(6,168,893)

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Jewellery Co.,Ltd									
Gold Jade	773,150,385	722,038,164	51,112,222	(7,040,608)	44,071,614	(51,112,222)	766,109,778	766,109,778	-
Thet Hein Gems & Jewellery Co;Ltd.	20,009,686	51,232,280	(31,222,594)	32,465,020	-	32,465,020	52,474,706	51,232,280	1,242,426
Myanmar Rich Land Gems	795,516,678	633,261,777	162,254,901	(163,647,831)	-	(163,647,831)	631,868,847	633,261,777	(1,392,930)
MEGA STAR JEWEL LIMITED	164,595,769	164,399,457	196,312	1,966,200	-	1,966,200	166,561,969	164,399,457	2,162,512
Kan Sein Pwint	1,975,800	5,799,380	(3,823,580)	-	-	-	1,975,800	5,799,380	(3,823,580)
Myanmar Winning Gate	765,589,917	831,947,156	(66,357,239)	-	-	-	765,589,917	831,947,156	(66,357,239)
San Family	203,458,842	218,879,538	(15,420,696)	-	-	-	203,458,842	218,879,538	(15,420,696)
HONG YENG YEE SHIN GEMS & JADE COMPANY LTD	99,524,011	66,964,958	32,559,053	(33,454,600)	-	(33,454,600)	66,069,411	66,964,958	(895,547)
Green Comet gems& Jade company	167,217,919	70,823,163	96,394,756	-	-	-	167,217,919	70,823,163	96,394,756
Gandawin Kyaut Myat Garden	56,064,947	55,429,079	635,868	1,581,000	-	1,581,000	57,645,947	55,429,079	2,216,868
U Hla Soe Oo	890,224,495	890,224,495	-	-	-	-	890,224,495	890,224,495	-
80000	996,268,623	880,629,460	115,639,163	(115,974,113)	-	(115,974,113)	880,294,510	880,629,460	(334,950)
Than Lwin Kyaw Kyar	228,760,646	219,160,646	9,600,000	-	9,600,000	(9,600,000)	228,760,646	228,760,646	-
Kyauk Myet Shwe Pyi	1,655,810,443	1,340,486,698	315,323,746	(315,623,746)	-	(315,623,746)	1,340,186,698	1,340,486,698	(300,000)
Moe Brothers	65,106,123	63,845,789	1,260,334	-	-	-	65,106,123	63,845,789	1,260,334
Innwa Nay Chi Co	161,628,345	91,749,814	69,878,530	(68,451,310)	-	(68,451,310)	93,177,035	91,749,814	1,427,221

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Jade Master	70,255,464	70,425,687	(170,224)	-	-	-	70,255,464	70,425,687	(170,224)
Shwe Tun Win	404,354,431	405,222,313	(867,883)	-	(855,000)	855,000	404,354,431	404,367,313	(12,883)
Jade Brothers	40,056,360	40,056,360	-	-	-	-	40,056,360	40,056,360	-
Myat Myittar Mon (G & J) Co.,Ltd	-	1,912,660,067	(1,912,660,067)	-	(1,912,660,067)	1,912,660,067	-	-	-
Pang Huke Duwa Co.,Ltd	221,117,058	288,358,068	(67,241,010)	-	-	-	221,117,058	288,358,068	(67,241,010)
Shwe Pyi Thar Gems Trading and Faceting Co.,Ltd	760,006,040	739,242,584	20,763,456	-	-	-	760,006,040	739,242,584	20,763,456
Khant Shwe Pyi Co.,Ltd	7,292,069,446	1,407,797,027	5,884,272,419	(87,860,902)	5,796,411,524	(5,884,272,426)	7,204,208,544	7,204,208,551	(7)
Nilar Yoma	18,200,198	203,402,729	(185,202,531)	-	(185,202,531)	185,202,531	18,200,198	18,200,198	-
Lyan Shan	732,920,478	548,151,779	184,768,699	(97,050,962)	87,717,737	(184,768,699)	635,869,516	635,869,516	-
Yadanar Myat Noe Thwe Gem	299,846,186	245,600,608	54,245,578	(68,839,581)	(13,294,440)	(55,545,141)	231,006,605	232,306,168	(1,299,563)
Kyi Wai Yan	169,785,714	90,578,867	79,206,847	(25,126,349)	68,463,360	(93,589,709)	144,659,365	159,042,227	(14,382,862)
Yadanar San Shwin Gem	487,126,965	397,102,384	90,024,581	1,780,510	91,805,091	(90,024,581)	488,907,475	488,907,475	-
MOGOK PRIDE	6,910,061	6,821,561	88,500	-	-	-	6,910,061	6,821,561	88,500
EXCELLENT RUBY & SAPPHIRE	1,450,000	1,450,000	-	-	-	-	1,450,000	1,450,000	-
CHATKIYAY GEMS & JEWELLERY CO.,LTD	7,871,973	21,024,512	(13,152,539)	12,810,200	-	12,810,200	20,682,173	21,024,512	(342,339)
SHWE NAING TUN	666,569	1,883,435	(1,216,866)	-	-	-	666,569	1,883,435	(1,216,866)
R.B.G	83,160,225	83,160,225	-	-	-	-	83,160,225	83,160,225	-
KHINE THIT SAR	44,353,658	43,331,610	1,022,048	-	-	-	44,353,658	43,331,610	1,022,048

Company	Templates originally lodged			Adjustments			Final amounts		
	Extractive company (a)	Government (b)	Difference (c) = (a - b)	Extractive company (d)	Government €	Difference (f) = (d-e)	Extractive company (g) = (a+d)	Government (h) = (b+e)	Difference (i) = (g-h)
Myanmar Lar Ba Gems Co., Ltd.	1,500,000	1,500,000	-	-	-	-	1,500,000	1,500,000	-
METAL METERO	4,131,168	7,451,168	(3,320,000)	-	-	-	4,131,168	7,451,168	(3,320,000)
THAN HTIKE LU	48,424,605	48,622,465	(197,860)	-	-	-	48,424,605	48,622,465	(197,860)
BIRDS GEM	-	910,000	(910,000)	-	-	-	-	910,000	(910,000)
ZABUKYAWAU NG	36,458,458	38,302,935	(1,844,477)	-	-	-	36,458,458	38,302,935	(1,844,477)
KYAN FAMILY	6,804,915	17,404,291	(10,599,376)	-	-	-	6,804,915	17,404,291	(10,599,376)
HTAY PAING	106,173,301	67,198,906	38,974,394	(36,513,329)	-	(36,513,329)	69,659,971	67,198,906	2,461,065
KYAW NAING & BROTHERS	176,082,151	170,221,293	5,860,857	-	-	-	176,082,151	170,221,293	5,860,857
LAW LU	87,210,729	85,409,007	1,801,722	(1,801,722)	-	(1,801,722)	85,409,007	85,409,007	-
MYANMAR SITHU	34,531,571	35,039,940	(508,369)	-	-	-	34,531,571	35,039,940	(508,369)
Pwint Phoo Nadi	4,220,045	4,220,045	-	-	-	-	4,220,045	4,220,045	-
Myanmar Economic Corporation	247,232,283	48,695,337	198,536,946	-	-	-	247,232,283	48,695,337	198,536,946
<b>Total</b>	<b>703,525,595,748</b>	<b>348,867,701,947</b>	<b>354,657,893,801</b>	<b>(358,171,127,840)</b>	<b>396,491,588</b>	<b>(358,567,619,429)</b>	<b>345,354,467,908</b>	<b>349,264,193,536</b>	<b>(3,909,725,628)</b>

**For military subsidiaries of Myanmar Economics Holding Public Company Limited (MEHPCL):**

No.	Company	Templates originally lodged			Adjustments			Final amounts		
		Extractive company (a)	Government (b)	Difference (c) = (a - b)	Extractive company (d)	Government €	Difference (f) = (d-e)	Extractive company (g) = (a+d)	Government (h) = (b+e)	Difference (i) = (g-h)
1	Myanmar Ruby Enterprise (Jewellery) Co., Ltd.	450,918,488	431,713,780	19,204,708	-	-	-	450,918,488	431,713,780	19,204,708
2	Thein Nhget Star (	330,055,801	330,055,801	-	-	-	-	330,055,801	330,055,801	-
3	Duwon Star (Gem Jewellery) Co.,Ltd	2,563,367	2,725,492	(162,125)	-	(324,246)	324,246	2,563,367	2,401,246	162,121
4	Dana Thedi Star (Gem&Jwellery) Co.,Ltd	4,648,677	5,795,871	(1,147,194)	-	(2,294,368)	2,294,368	4,648,677	3,501,503	1,147,174
5	Si Tra Star	4,355,488	2,083,860	2,271,628	-	-	-	4,355,488	2,083,860	2,271,628
6	Pone Nyet (Gem & Jewellery) Co.,Ltd	62,551,391	62,551,391	-	-	-	-	62,551,391	62,551,391	-
7	ThitSarPann (Gems & Jewellery) Co.,Ltd	2,540,000	1,550,000	990,000	-	-	-	2,540,000	1,550,000	990,000
8	Jasmine	12,977,549	12,977,549	-	-	-	-	12,977,549	12,977,549	-
Total		870,610,761	849,453,744	21,157,017	-	(2,618,614)	2,618,614	870,610,761	846,835,130	23,775,631



## 5.2.2. Cash flows reconciliation by revenue stream

### For Companies in scope:

The tables below show the original payments reported by extractive companies and Government Agencies, taking into account all adjustments:

**Table 125: Gems and Jade payments reconciliation per tax**

*Amounts in MMK*

Description	Templates originally lodged			Adjustments			Final amounts		
	Extractive company (a)	Government (b)	Difference (c) = (a - b)	Extractive company (d)	Government (e)	Difference (f) = (d-e)	Extractive company (g) = (a+d)	Government (h) = (b+e)	Difference (i) = (g-h)
<b>Payments in cash</b>	<b>703,525,595,748</b>	<b>348,867,701,947</b>	<b>354,657,893,801</b>	<b>(358,171,127,840)</b>	<b>396,491,588</b>	<b>(357,774,636,252)</b>	<b>345,354,467,908</b>	<b>349,264,193,536</b>	<b>(3,909,725,628)</b>
<b>MoF-Customs Department</b>	<b>11,802,816,867</b>	<b>3,386,503,657</b>	<b>8,416,313,210</b>	<b>(9,439,549,011)</b>	<b>(1,085,718,819)</b>	<b>(8,353,830,192)</b>	<b>2,363,267,856</b>	<b>2,300,784,838</b>	<b>62,483,018</b>
Customs Duties	1,823,677,992	3,386,503,657	(1,562,825,665)	(164,926,245)	(1,718,515,908)	1,553,589,663	1,658,751,747	1,667,987,749	(9,236,002)
Commercial Tax on Imports	4,270,010,143	-	4,270,010,143	(4,103,548,500)	94,742,623	(4,198,291,123)	166,461,643	94,742,623	71,719,020.00
Corporate Income Tax (Advance income tax 2%)	1,513,713,887	-	1,513,713,887	(1,477,043,485)	36,670,402	(1,513,713,887)	36,670,402	36,670,402	-
Specific Goods Tax (MCD)	4,195,414,845	-	4,195,414,845	(3,694,030,781)	501,384,064	(4,195,414,845)	501,384,064	501,384,064	0.00
<b>MoF-IRD</b>	<b>58,320,549,350</b>	<b>19,198,282,527</b>	<b>39,122,266,823</b>	<b>(37,977,702,030)</b>	<b>1,344,883,528</b>	<b>(39,322,585,558)</b>	<b>20,342,847,320</b>	<b>20,543,166,055</b>	<b>(200,318,736)</b>
Corporate Income Tax	9,451,456,627	8,785,301,210	666,155,417	1,554,928,163	2,348,892,145	(793,963,982)	11,006,384,790	11,134,193,355	(127,808,564.79)
Commercial Tax	441,011,963	1,220,005,346	(778,993,382)	3,907,670,314	3,152,281,394	755,388,920	4,348,682,277	4,372,286,739	(23,604,462)
Capital Gains Tax	39,980,250	47,130,250	(7,150,000)	37,588,162	30,438,162	7,150,000	77,568,412	77,568,412	-
Withholding Tax	223,063	-	223,063	-	-	-	223,063	-	223,063
Specific Goods Tax (IRD)	48,350,289,285	9,145,845,722	39,204,443,563	(43,440,300,507)	(4,186,728,173)	(39,253,572,334)	4,909,988,778	4,959,117,549	(49,128,771.73)
Other significant payments (> USD 50,000) IRD	37,588,162	-	37,588,162	(37,588,162)	-	(37,588,162)	-	-	-

Description	Templates originally lodged			Adjustments			Final amounts		
	Extractive company (a)	Government (b)	Difference (c) = (a - b)	Extractive company (d)	Government (e)	Difference (f) = (d-e)	Extractive company (g) = (a+d)	Government (h) = (b+e)	Difference (i) = (g-h)
Department of Mining (DOM)	6,299,858,960	-	6,299,858,960	(6,299,858,960)	-	(6,299,858,960)	-	-	-
Royalties on Production - Raw Materials 20%, Added Value 10%	6,299,858,960	-	6,299,858,960	(6,299,858,960)	-	(6,299,858,960)	-	-	-
State Owned Enterprises: Myanmar Gems Enterprise	627,003,169,301	326,282,915,763	300,720,253,538	(304,367,192,886)	137,326,880	(304,504,519,766)	322,635,976,416	326,420,242,643	(3,784,266,228)
Royalties - Production (20% Jade, ruby and sapphire, 10% other Gems)	17,604,331,281	16,992,438,864	611,892,417	(1,676,623,037)	64,100	(1,676,687,137)	15,927,708,243	16,992,502,964	(1,064,794,720.72)
Commercial Tax - 5% (EURO Sales)	288,316,963	271,902,019	16,414,944	(26,522,988)	(1,650,366)	(24,872,622)	261,793,975	270,251,653	(8,457,678)
Specific Goods Tax - Jade 20%, Gems 15%, 5 % Value added for finish goods	106,410,430,268	143,149,598,386	(36,739,168,118)	35,934,396,139	59,788,248	35,874,607,891	142,344,826,406	143,209,386,633	(864,560,227.01)
Sale Split	462,452,979,472	126,003,665,189	336,449,314,283	(337,663,767,022)	261,759,896	(337,925,526,917)	124,789,212,450	126,265,425,085	(1,476,212,634)
Service Fees Euro Sales - Raw Materials 3%, Added Value 1%	30,933,771,336	32,391,335,572	(1,457,564,237)	1,230,022,735	13,751,294	1,216,271,440	32,163,794,070	32,405,086,867	(241,292,796.22)
Incentive fees 1%, 2%	4,671,983,795	4,974,411,612	(302,427,818)	275,606,468	(11,417,815)	287,024,284	4,947,590,263	4,962,993,797	(15,403,534)
Permit/License Fee	2,639,405,152	-	2,639,405,152	(2,638,764,023)	-	(2,638,764,023)	641,129	-	641,129.30
Penalties for cancelled sales	1,991,591,457	2,494,564,121	(502,972,664)	208,015,786	(184,968,476)	392,984,262	2,199,607,243	2,309,595,644	(109,988,401)
Other significant payments (> USD 50,000) MGE	10,359,577	5,000,000	5,359,577	(9,556,943)	-	(9,556,943)	802,634	5,000,000	(4,197,365.74)

Description	Templates originally lodged			Adjustments			Final amounts		
	Extractive company (a)	Government (b)	Difference (c) =(a - b)	Extractive company (d)	Government (e)	Difference (f) = (d-e)	Extractive company (g) = (a+d)	Government (h) = (b+e)	Difference (i) = (g-h)
Central Committee (MONREC)	89,201,270	-	89,201,270	(86,824,953)	-	(86,824,953)	2,376,317	-	2,376,317
Entrance fees	89,201,270	-	89,201,270	(86,824,953)	-	(86,824,953)	2,376,317	-	2,376,317
States/regions	10,000,000	-	10,000,000	-	-	-	10,000,000	-	10,000,000
Contribution to the State/region social development fund	10,000,000	-	10,000,000	-	-	-	10,000,000	-	10,000,000.00
Social payments	380,820,000	-	380,820,000	-	-	-	380,820,000	-	380,820,000
Voluntary Corporate Social Responsibility	370,820,000	-	370,820,000	-	-	-	370,820,000	-	370,820,000.00
Other significant payments (> USD 50,000) SP	10,000,000	-	10,000,000	-	-	-	10,000,000	-	10,000,000
Total	703,525,595,748	348,867,701,947	354,657,893,801	(358,171,127,840)	396,491,588	(358,567,619,429)	345,354,467,908	349,264,193,536	(3,909,725,628)

**For military subsidiaries of Myanmar Economics Holding Public Company Limited (MEHPCL) :**

*Amounts in MMK*

N°	Description	Templates originally lodged			Adjustments			Final amounts		
		Extractive company (a)	Government (b)	Difference (c) = (a - b)	Extractive company (d)	Government (e)	Difference (f) = (d-e)	Extractive company (g) = (a+d)	Government (h) = (b+e)	Difference (i) = (g-h)
	<b>Payments in cash</b>									
	<b>MOPF-IRD</b>	<b>705,046,702</b>	<b>288,890,391</b>	<b>416,156,311</b>	<b>(414,461,344)</b>	<b>(2,618,614)</b>	<b>(411,842,730)</b>	<b>290,585,358</b>	<b>286,271,777</b>	<b>4,313,581</b>
7	Corporate Income Tax	288,871,072	286,271,777	2,599,295	-	-	-	288,871,072	286,271,777	2,599,295
8	Commercial Tax	1,714,286	-	1,714,286	-	-	-	1,714,286	-	1,714,286
12	Specific Goods Tax	414,461,344	2,618,614	411,842,730	(414,461,344)	(2,618,614)	(411,842,730)	-	-	-
	<b>State Owned Enterprises: Myanmar Gems Enterprise</b>	<b>165,564,059</b>	<b>560,563,353</b>	<b>(394,999,294)</b>	<b>414,461,344</b>	<b>-</b>	<b>414,461,344</b>	<b>580,025,403</b>	<b>560,563,353</b>	<b>19,462,050</b>
17	Royalties - Production (20% Jade, ruby and sapphire, 10% other Gems)	28,792,780	9,330,000	19,462,780	-	-	-	28,792,780	9,330,000	19,462,780
19	Specific Goods Tax - Jade 20%, Gems 15%, 5 % Value added for finish goods	-	414,461,630	(414,461,630)	414,461,344	-	414,461,344	414,461,344	414,461,630	(285.96)
21	Service Fees Euro Sales - Raw Materials 3%, Added Value 1%	136,771,279	136,771,723	(444)	-	-	-	136,771,279	136,771,723	(444)
	<b>Total</b>	<b>870,610,761</b>	<b>849,453,744</b>	<b>21,157,017</b>	<b>-</b>	<b>(2,618,614)</b>	<b>2,618,614</b>	<b>870,610,761</b>	<b>846,835,130</b>	<b>23,775,631</b>

### 5.2.3. In kind flows reconciliation

The tables below summarise the differences, in-kind production reported by extractive companies and receipts reported by MGE by company:

Table 126: Gems and Jade production reconciliation

Jade in Kg										
N°	Description	Templates originally lodged			Adjustments			Final amounts		
		Extractive company (a)	Government (b)	Difference (c) =(a - b)	Extractive company (d)	Government (e)	Difference (f) = (d-e)	Extractive company (g) = (a+d)	Government (h) = (b+e)	Difference (i) = (g-h)
Payments in Kind										
	Production Split (In Kind)	1,919	59,092	(57,173)	-	-	-	1,919	59,092	(57,173)
1	Wai Aung Gabar Gems Co; Ltd.	1,292	1,292	-	-	-	-	1,292	1,292	-
2	Jewel Crown Company	627	-	627	-	-	-	627	-	627
3	Ayar Jade Co.,Ltd.	-	57,800	(57,800)				-	57,800	(57,800)
	Total	1,919	59,092	(57,173)	-	-	-	1,919	59,092	(57,173)

### 5.2.4. Adjustments to Gems & Jade Sub-sector

#### extractive companies' adjustments

The adjustments were carried out on the basis of confirmations from extractive companies and Government Agencies and were supported by adequate evidence wherever deemed appropriate. The adjustments made are detailed as follows:

Adjustments to extractive company payments		Amounts in MMK
		Total Amount
Tax amount incorrectly reported		(362,113,188,144)
Tax paid not reported		15,989,436,286
Tax reported but not paid		(5,724,009,967)
Tax paid reported but outside the period covered		(3,416,517,707)
Tax paid to other Government entity		(1,972,140,289)
Tax paid on other identification number		(932,457,526)
Tax paid reported but outside the reconciliation scope		(2,250,492)
<b>Total added to amounts originally reported</b>		<b>(358,171,127,840)</b>

**(a) Taxes amount incorrectly reported**

These are payment flows incorrectly reported by the extractive companies (i.e.: payments in Euro reported in MMK, amounts doubly reported...). Adjustments were based on the receipt or confirmation companies. We set out in the table below a summary of the adjustments made to company payments:

		<i>Amounts in MMK</i>							
Adjustments to Government Entity payments	Total Amount (in MMK)	Sale Split	Royalties on Production (MGE)	Specific Goods Tax (IRD)	Specific Goods Tax (MCD)	Corporate Income Tax	Specific Goods Tax (MGE)	Service Fees Euro Sales	Other Taxes
Kyaing International (GKI)	(342,668,735,147)	(342,668,735,147)	-	-	-	-	-	-	-
SILVER ELEPHANT GEMS CO LTD	(10,072,178,475)	(184,879,984)	(9,798,028,000)	-	-	(228,620,608)	-	6,874,470	132,475,646
Same Lei Yadanar Win Co (SLYW)	(1,738,610,563)	-	-	(1,738,610,563)	-	-	-	-	-
Kyauk Seinn Sun Shwin Jade Gems & Jewellery Co Ltd	(1,507,740,762)	-	-	(1,507,740,762)	-	-	-	-	-
U YA GEMS (Oo Ya Gems & Jewellery)	(1,233,382,370)	-	-	(1,231,056,443)	-	-	-	-	(2,325,927)
Treasure Star Co., Ltd.	(1,210,280,978)	-	-	-	(897,973,660)	-	-	(206,534,038)	(105,773,280)
Yadanar Three Elephants Co	(1,046,129,158)	-	-	(1,046,129,158)	-	-	-	-	-
Kyauk Seinn Wingabar Jade Gems & Jewellery Co.,Ltd	(657,078,252)	-	-	(657,078,252)	-	-	-	-	-
Aung Hein Minn	(339,002,747)	-	-	(339,002,747)	-	-	-	-	-
Yadanar Sin Thiri Gems Co	(299,535,698)	-	-	(299,535,698)	-	-	-	-	-
Jade Treasure	(255,878,958)	-	-	(255,878,958)	-	-	-	-	-
YADANAR TAUNG TEN	(232,195,696)	-	(178,786,000)	-	-	(53,409,696)	-	-	-
Other companies	(852,439,341)	101,435,167	(76,044,760)	(505,033,593)	(189,264,820)	(140,852,568)	341,531,749	(22,626,000)	(361,584,515)
Total added to amounts originally reported	(362,113,188,144)	(342,752,179,964)	(10,052,858,760)	(7,580,066,174)	(1,087,238,480)	(422,882,872)	341,531,749	(222,285,568)	(337,208,076)

**(b) Taxes paid not reported**

These are payment flows reported by Government Agencies but were not reported by Gems and Jade companies. Adjustments were based on the receipt or confirmation of the company. We set out in the table below a summary of the adjustments made to company payments:

		<i>Amounts in MMK</i>							
Adjustments to Government Entity payments	Total Amount (in MMK)	Sale Split	Royalties on Production (MGE)	Specific Goods Tax (MGE)	Corporate Income Tax	Specific Goods Tax (IRD)	Service Fees Euro Sales	Penalties for cancelled sales	Other Taxes
YADANAR TAUNG TEN	2,188,776,599	1,810,181,594	-	199,068,747	-	-	50,389,756	97,871,886	31,264,616
Sein Lonm Taung Tan (SLTT-S)	1,839,387,540	-	-	-	160,000,000	1,679,387,540	-	-	-
Yadanar Three Elephants Co	1,357,597,452	1,344,417,103	-	-	-	-	-	7,227,884	5,952,466
Treasure Star Co., Ltd.	1,325,489,193	-	211,716,935	889,245,627	-	-	204,526,630	-	20,000,000
GREEN MOUNTAIN CO;LTD	1,259,717,048	1,094,052,872	129,272,840	-	7,449,903	-	-	27,941,432	1,000,000
Kaung Swan Htet Co	599,316,195	463,270,353	-	-	-	-	88,184,197	10,753,182	37,108,464
Chaow Brothers Gemstone Enterprise Ltd	581,072,426	469,610,492	71,066,460	16,991,828	-	-	3,908,120	2,087,701	17,407,825
SILVER ELEPHANT GEMS CO LTD	515,881,415	-	-	-	515,881,415	-	-	-	-
Kyauk Myet Shwe Pyi	512,281,476	-	295,916,240	5,567,436	-	-	184,324,478	23,028,323	3,445,000
Same Lei Yadanar Win Co (SLYW)	476,875,821	-	58,178,580	-	-	-	399,880,749	18,816,492	-
Htun Tauk Zabu Gems & Jewellery Co;Ltd.	436,572,092	-	436,266,860	-	-	-	-	305,232	-
Kyauk Seinn Sun Shwin Jade Gems & Jewellery Co Ltd	367,767,222	-	8,067,830	-	-	-	343,921,722	3,157,585	12,620,085
Myanmar Imperial Jade Co	353,220,918	-	-	-	330,000,000	-	-	7,346,298	15,874,620
Other companies	4,175,480,888	878,653,877	1,091,100,910	787,676,329	694,310,060	-	249,192,810	334,150,719	140,396,183
<b>Total added to amounts originally reported</b>	<b>15,989,436,286</b>	<b>6,060,186,292</b>	<b>2,301,586,655</b>	<b>1,898,549,966</b>	<b>1,707,641,378</b>	<b>1,679,387,540</b>	<b>1,524,328,462</b>	<b>532,686,735</b>	<b>285,069,259</b>

**(c) Tax reported but not paid**

These adjustments were made to the Gems & Jade reporting templates. During the reconciliation work they stated that this payment was not made. Accordingly, we adjusted their reporting template

		<i>Amounts in MMK</i>				
Adjustments to Government Entity payments	Total Amount (in MMK)	Specific Goods Tax MGE	Permit/License Fee	Sale Split	Specific Goods Tax (IRD)	Other Taxes
Thirawmani	(2,247,977,997)	(2,244,273,552)	-	-	-	(3,704,446)
Northern Jade World	(1,046,240,000)	-	(1,046,240,000)	-	-	-
Delta Land	(934,066,848)	-	-	(934,066,848)	-	-
Kaung Swan Htet Co	(602,895,841)	-	-	-	(602,895,841)	-
U YA GEMS (Oo Ya Gems & Jewellery)	(565,068,564)	(564,403,394)	-	-	-	(665,170)
Other companies	(327,760,717)	-	-	(106,656,089)	(75,117,625)	(145,987,003)
<b>Total added to amounts originally reported</b>	<b>(5,724,009,967)</b>	<b>(2,808,676,946)</b>	<b>(1,046,240,000)</b>	<b>(1,040,722,937)</b>	<b>(678,013,466)</b>	<b>(150,356,619)</b>

**(d) Tax paid reported but outside the period covered by the EITI Report**

These are payments reported, but which fall outside the reconciliation period, i.e. before 1 April 2017 or after 31 March 2018. Adjustments were made to the reporting template of the following companies:

		Amounts in MMK					
Adjustments to Government Entity payments	Total Amount (in MMK)	Permit/License Fee	Corporate Income Tax	Penalties for cancelled sales	Commercial Tax on Imports	Specific Goods Tax (MCD)	Other Taxes
Northern Jade World	(1,002,734,000)	(1,002,734,000)	-	-	-	-	-
Kan Pwint Oo	(684,016,514)	-	(684,016,514)	-	-	-	-
Sin Gaung Taung	(524,360,856)	(524,360,856)	-	-	-	-	-
SHWE OAK KHAI MINING CO., LTD.	(499,189,050)	-	(72,389,629)	-	(204,471,233)	(166,516,000)	(55,812,188)
Unity	(366,553,548)	-	-	(366,553,548)	-	-	-
80000	(115,974,113)	-	(115,974,113)	-	-	-	-
Other companies	(223,689,626)	-	(118,980,491)	-	(6,767,268)	-	(97,941,867)
Total added to amounts originally reported	(3,416,517,707)	(1,527,094,856)	(991,360,747)	(366,553,548)	(211,238,501)	(166,516,000)	(153,754,055)



**(e) Tax paid to other Government entity**

These adjustments were made to the payments reported by Gems & Jade companies, however most of these payments (Specific Goods Tax) were paid to MGE and not IRD.

Adjustments to Government Entity payments	Total Amount (in MMK)	Amounts in MMK	
		Specific Goods Tax (IRD)	Commercial Tax
Kyauk Myet Shwe Pyi	(827,905,222)	(827,905,222)	-
Myanmar Rich Land Gems	(340,274,389)	(337,433,705)	(2,840,684)
Jewel Crown Company	(230,771,576)	(230,771,576)	-
ARS Gems [ARS]	(216,608,583)	(216,608,583)	-
Khine Myanmar	(121,678,086)	(121,678,086)	-
Thigi Myintzu Yadanar	(72,485,193)	(72,485,193)	-
Yadanar Myat Noe Thwe Gem	(68,839,581)	(68,839,581)	-
Innwa Nay Chi Co	(68,451,310)	(68,451,310)	-
Kyi Wai Yan	(25,126,349)	(25,126,349)	-
<b>Total added to amounts originally reported</b>	<b>(1,972,140,289)</b>	<b>(1,969,299,606)</b>	<b>(2,840,684)</b>

**(f) Tax paid on other identification number**

These are payments reported by the extractive companies, but which are paid by non-extractive other companies. Adjustments were made to the reporting template of the following companies:

Adjustments to Government Entity payments	Total Amount (in MMK)	Amounts in MMK			
		Specific Goods Tax (MGE)	Service Fees Euro Sales	Specific Goods Tax (IRD)	Royalties on Production (MGE)
Myanmar Thura [MTY]	(916,046,564)	(745,137,895)	(170,908,670)	-	-
Yadanar Pyi Phyo Aung Gems Co., Ltd	(12,908,162)	-	(2,413,720)	(10,494,441)	-
Yadanar San Shwin Gem	(3,502,800)	-	-	-	(3,502,800)
<b>Total added to amounts originally reported</b>	<b>(932,457,526)</b>				

**(g) Tax paid reported but outside the reconciliation scope**

The adjustment was made to the reporting template of U Ya Gems for a total amount of MMK 2,250,492.

## Adjustments to Government Agencies templates

The adjustments were carried out on the basis of confirmations received from extractive companies or from Government Agencies and supported by payment receipts wherever deemed appropriate. These adjustments are detailed as follows:

<i>Amounts in MMK</i>	
Adjustments to Government payments	Total Amount
Tax received not reported	10,028,854,697
Tax reported but not received	(4,641,578,991)
Tax amount incorrectly reported	(2,775,529,325)
Tax related to activity other than mining	(1,912,660,067)
Tax received on other identification number	(274,289,258)
Tax received reported but outside the reconciliation scope	(28,305,468)
Total added to amounts originally reported	396,491,588

### (a) Taxes received not reported

These are payment flows reported by extractives companies, but which were not reported by Government Agencies. We set out in the table below a summary of the adjustments made to Government Agencies' initial reporting:

<i>Amounts in MMK</i>		<i>Amounts in MMK</i>		
Adjustments to Government Entity payments	Total Amount (in MMK)	MoF-IRD	MoF-Customs Department	State Owned Enterprises: MGE
Khant Shwe Pyi Co.,Ltd	5,796,411,524	5,796,411,524	-	-
GREEN MOUNTAIN CO; LTD	923,980,739	918,250,341	5,730,398	-
Yar Za Htar Ni	494,961,376	-	494,905,300	56,076
Myanmar Thura [MTY]	263,026,219	252,258,580	10,767,639	-
Ayeyar Yadanar Gems & Jewellery Co.,Ltd	201,382,199	-	201,382,199	-
Lucky Star Jade Group	158,817,600	158,817,600	-	-
Shwe Hein Htet Gems Co Ltd	165,852,862	165,852,862	-	-
Great wall Gems&Jade company	143,476,829	143,476,829	-	-
Value Standard	124,963,957	-	124,963,957	-
U YA GEMS	118,024,930	1,079,275	112,113,373	4,832,282
1 1 1	105,652,066	105,652,066	-	-
Kaung Myat Thu Ka	100,882,447	86,147,823	14,734,624	-
Other companies	1,431,421,950	1,130,356,503	164,938,483	136,126,964
Total added to amounts originally reported	10,028,854,697	8,758,303,403	1,129,535,973	141,015,322

## Taxes reported but not received

These adjustments were made to the Government Entity reporting templates. During the reconciliation work they stated that this payment was not received. Accordingly, we adjusted their reporting template. We set out in the table below a summary of the adjustments made to Government Agencies' initial reporting:

Adjustments to Government Entity payments	Total Amount (in MMK)	Amounts in MMK	
		Specific Goods Tax (IRD)	Other Taxes
Phyo Thiha Kyaw	(3,482,187,896)	(3,482,187,896)	-
Myanma Seinn Lei Aung Gems Co Ltd.	(604,066,348)	(604,066,348)	-
Ever Winner [EW]	(401,780,184)	(401,780,184)	-
Lawka Nandar	(137,236,814)	(137,236,814)	-
Other companies	(16,307,748)	-	(16,307,748)
<b>Total added to amounts originally reported</b>	<b>(4,641,578,991)</b>	<b>(4,625,271,243)</b>	<b>(16,307,748)</b>

## (b) Tax amount incorrectly reported

These are payment flows incorrectly reported by the government entities. Adjustments were based on the receipt or confirmation of government entities. We set out in the table below a summary of the adjustments made to government received payments:

Adjustments to Government Entity payments	Total Amount (in MMK)	Amounts in MMK	
		IRD	MGE
Nay Min Kabar Co	(990,677,697)	(990,677,697)	-
Great Genesis Gems (GMH)	(734,591,816)	(734,591,816)	-
Kaung Su Aung	(557,943,762)	(557,943,762)	-
Tun Naing Aung	(409,604,314)	(409,604,314)	-
Other companies	(82,711,737)	(82,299,038)	(412,698)
<b>Total added to amounts originally reported</b>	<b>(2,775,529,325)</b>	<b>(2,775,116,627)</b>	<b>(412,698)</b>

## (c) Tax related to activity other than mining

This adjustment is made to the customs duties reported by MCD for the company Myat Myittar Mon Co., Ltd which didn't perform any extractive activity during the FY 2017-2018.

## (d) Taxes received on other identification number

These adjustments are made to the customs duties reported by MCD on other TIN. The adjustments are made to the payments reported by MCD for the following companies:

Adjustments to Government Entity payments	Total Amount (in MMK)	Amounts in MMK	
Nilar Yoma	(185,202,531)		
Yadanar Myat Noe Thwe Gem	(84,098,465)		
Aung Hein Minn	(4,988,262)		
<b>Total added to amounts originally reported</b>	<b>(274,289,258)</b>		

## (e) Tax received reported but outside the reconciliation scope

This adjustment is made to the payment of MMk 28,305,468 reported by MCD outside the reconciliation scope for the company Htun Tauk Zabu Gems Co.,

## 5.2.5. Unreconciled discrepancies

Following our adjustments, the total unreconciled discrepancies amounted to MMK (3,909,725,628) representing (1.12%) of total payments reported by Government Bodies. This is the sum of positive differences of MMK 84,959,530 and negative differences amounting to MMK (3,994,685,158). These unreconciled differences can be analysed as follows:

*Amounts in MMK*

Reasons for differences	Total payments (MMK)
Tax not reported by the extractive company	(4,616,377,900)
Tax not reported by the Govt Body	789,802,898
Reporting template not submitted by the extractive company	(56,010,605)
Not material difference < 1.5 Million Kyats	(29,140,021)
Reporting template not submitted by the Govt Body	2,000,000
<b>Total differences</b>	<b>(3,909,725,628)</b>

### (a) Tax not reported by the extractive company

This difference is related to taxes declared by Government Bodies as a payment from gems and jade companies. However, the companies didn't report these payments in their reporting templates. The differences are detailed by company by tax as below:

*Amounts in MMK*

Company	Total	Specific Goods Tax (MGE)	Sale Split	Royalties Production (MGE)	Service Fees Euro Sales	Corporate Income Tax	Specific Goods Tax (IRD)	Penalties for cancelled sales	Other Taxes
Yi Li Fa	(1,313,830,770)	(1,030,704,152)	-	-	(238,209,595)	(44,917,023)	-	-	-
Kaung Su Aung	(804,618,727)	-	(800,385,816)	-	-	-	-	-	(4,232,911)
Ma Li Kha Gem Stone Co	(336,629,729)	-	-	(336,629,729)	-	-	-	-	-
Seinn Nay Chi Gems & jade company	(760,331,435)	-	(601,084,495)	(159,246,940)	-	-	-	-	-
Chang Long Gems & Jewellery Co Ltd	(115,000,000)	-	-	-	-	(115,000,000)	-	-	-
Shinning Star Light Gems & Jewellery Co.,Ltd	(105,236,302)	-	(70,962,275)	-	(13,185,952)	-	-	(18,396,835)	(2,691,240)

Seine Light	(101,935,390)	(56,112,470)	-	(32,917,060)	(12,905,861)	-	-	-	-
Kaung Wai Yan Co	(92,463,840)	-	-	(92,463,840)	-	-	-	-	-
Jade Thazin	(81,198,449)	-	-	(28,278,740)	-	-	(51,286,703)	(1,633,006)	-
Kyaing International (GKI)	(76,139,949)	(21,656,813)	(33,750,602)	-	(4,947,301)	(12,000,000)	-	(3,785,232)	-
Nay Chi Yadanar Co., Ltd.	(79,564,451)	-	-	(51,815,700)	-	(16,204,765)	-	-	(11,543,986)
Goldend Light gems	(42,872,403)	-	-	-	(6,008,655)	(35,664,430)	-	(1,199,318)	-
Pang Huke Duwa Co.,Ltd	(67,227,231)	(49,052,245)	-	-	(11,282,430)	-	-	(6,892,556)	-
Myanmar Winning Gate (GMWG)	(66,160,377)	-	-	(64,429,440)	-	-	-	(1,730,937)	-
Other Companies	(573,168,846)	(63,908,668)	(41,369,007)	(250,771,488)	(10,390,362)	(52,171,075)	-	(71,346,961)	(83,211,286)
<b>Total</b>	<b>(4,616,377,900)</b>	<b>(1,221,434,348)</b>	<b>(1,547,552,196)</b>	<b>(1,016,552,937)</b>	<b>(296,930,155)</b>	<b>(275,957,293)</b>	<b>(51,286,703)</b>	<b>(104,984,845)</b>	<b>(101,679,423)</b>

**(b) Tax not reported by Government Entities**

This difference is related to taxes declared by gems and jade companies as a payment to Government Bodies. However, the Government Bodies didn't report these payments in their reporting templates. The differences are detailed by company by tax as below:

		Amounts in MMK						
Company	Total	Specific Goods Tax (MGE)	Corporate Income Tax	Commercial Tax on Imports (MCD)	Sale Split	Service Fees Euro Sales	Commercial Tax	Other Taxes
Myanmar Economic Corporation	203,588,048	167,331,147	-	-	-	35,121,945	-	1,134,956
Green Comet gems& Jade company	96,394,756	-	63,171,100	-	-	-	33,223,656	-
Thigi Myintzu Yadanar	70,777,511	-	-	70,777,511	-	-	-	-
KYAW NAING & BROTHERS	52,684,682	45,833,027	-	-	-	6,851,655	-	-
Chang Long Gems & Jewellery Co Ltd	45,925,520	36,631,575	-	-	-	8,425,262	-	868,683
Ngwe Si Hein	41,266,846	14,534,452	-	-	23,389,347	3,343,047	-	-
Ruby Dragon Company	38,671,415	9,846,936	28,824,479	-	-	-	-	-
Mya Garden (GEG)	37,622,386	-	-	-	37,622,386	-	-	-
Kyauk Seinn Minn Gems	35,741,500	6,444,959	29,296,541	-	-	-	-	-
Yadanar Yaung Chi	32,256,252	32,256,252	-	-	-	-	-	-
Other Companies	134,873,982	54,599,547	26,586,404	-	10,938,138	9,265,100	3,876,015	29,608,778
<b>Total</b>	<b>789,802,898</b>	<b>367,477,896</b>	<b>147,878,524</b>	<b>70,777,511</b>	<b>71,949,871</b>	<b>63,007,008</b>	<b>37,099,671</b>	<b>31,612,416</b>

**(c) Reporting template not submitted by the extractive company**

In the total, 4 companies did not submit their reporting templates. Only 2 companies have made payments to the government agencies during the FY 2017-2018 to the government agencies as below:

<i>Amounts in MMK</i>	
Companies that have not submitted a reporting template	Total payments reported by the government
A K N K	(43,957,340)
Phar Kant Sai Bon	(12,053,265)
Palaung National	-
Myat Myittar Mon (G & J) Co.,Ltd	-
<b>Total</b>	<b>(56,010,605)</b>

**(d) Not material difference**

These differences correspond to immaterial differences above i.e. falling below the materiality threshold of **MMK 1,500,000**.

## 5.3. Payments of other minerals companies

### 5.3.1. Cash flows reconciliation by company

The tables below show the differences between the payments reported by extractive companies and receipts reported by Government Agencies.

The tables include consolidated figures based on the reporting templates prepared by each extractive company and Government Agencies, adjustments made following our reconciliation work and the residual unreconciled differences:

**Table 127: Other minerals payments reconciliation per company**

*Amounts in MMK*

Company	Templates originally lodged			Adjustments			Final amounts		
	Extractive company (a)	Government (b)	Difference (c) = (a - b)	Extractive company (d)	Government €	Difference (f) = (d-e)	Extractive company (g) = (a+d)	Government (h) = (b+e)	Difference (i) = (g-h)
NATIONAL PROSPERITY COMPANY LIMITED	519,141,118	1,727,802,360	(1,208,661,242)	1,011,492,374	(194,811,638)	1,206,304,012	1,530,633,492	1,532,990,722	(2,357,230)
MYANMAR ECONOMIC CORPORATION LIMITED	2,345,198,497	10,231,883,475	(7,886,684,978)	7,996,093,944	167,040,085	7,829,053,859	10,341,292,441	10,398,923,559	(57,631,118.49)
GEO ASIA INDUSTRY & MINING COMPANY LIMITED	145,183,504	1,328,813,695	(1,183,630,191)	44,839,180	(1,138,791,011)	1,183,630,191	190,022,684	190,022,684	-
CORNERSTONE RESOURCES ( MYANMAR ) LTD.	1,339,608,611	2,630,079,966	(1,290,471,355)	1,316,858,058	26,283,466	1,290,574,592	2,656,466,670	2,656,363,432	103,237.11
ETERNAL MINING COMPANY LIMITED	722,754,100	240,028,672	482,725,428	-	482,725,428	(482,725,428)	722,754,100	722,754,100	-
MYANMA ECONOMIC HOLDINGS PUBLIC COMPANY LIMITED	28,607,502,174	29,133,864,790	(526,362,616)	440,777,364	-	440,777,364	29,048,279,538	29,133,864,790	(85,585,252.03)
KAYAH STATE MINERAL PRODUCTION COMPANY LIMITED	136,047,052	296,146,339	(160,099,287)	(33,412,603)	(192,980,210)	159,567,607	102,634,449	103,166,129	(531,680)
SHWE MOE YAN COMPANY LIMITED	104,167,807	161,543,588	(57,375,781)	-	-	-	104,167,807	161,543,588	(57,375,781.00)
GPS JOINT VENTURE COMPANY LIMITED	124,816,789	136,528,597	(11,711,808)	12,019,200	-	12,019,200	136,835,989	136,528,597	307,392
SHWE TAUNG MINING COMPANY LIMITED	1,173,550,085	1,185,366,299	(11,816,214)	30,412,923	19,673,000	10,739,923	1,203,963,008	1,205,039,299	(1,076,291.00)
DELCO LIMITED	65,337,191	212,538,851	(147,201,660)	34,792,059	(112,609,601)	147,401,660	100,129,250	99,929,250	200,000
MAX (MYANMAR) COMPANY LIMITED	1,617,201,861	806,430,704	810,771,157	70,941,928	881,806,145	(810,864,217)	1,688,143,789	1,688,236,849	(93,060.00)
FIRST RESOURCES COMPANY LIMITED	1,035,608,953	930,035,820	105,573,133	182,321,082	287,894,215	(105,573,133)	1,217,930,035	1,217,930,035	0
PACIFIC LINK CEMENT INDUSTRIES LIMITED	-	739,978,360	(739,978,360)	-	-	-	-	739,978,360	(739,978,360.00)
WIN MYINT MO INDUSTRIES COMPANY LIMITED	615,434,173	1,714,234,065	(1,098,799,892)	1,087,669,428	-	1,087,669,428	1,703,103,601	1,714,234,065	(11,130,464)
No.(2)Heavy Industry, Ministry of Industry	-	99,484,644	(99,484,644)	52,356,560	-	52,356,560	52,356,560	99,484,644	(47,128,084.04)

Company	Templates originally lodged			Adjustments			Final amounts		
	Extractive company (a)	Government (b)	Difference (c) = (a - b)	Extractive company (d)	Government €	Difference (f) = (d-e)	Extractive company (g) = (a+d)	Government (h) = (b+e)	Difference (i) = (g-h)
MYANMAR PONGPIPAT COMPANY LIMITED	251,191,170	352,073,293	(100,882,122)	21,581,007	(80,436,008)	102,017,015	272,772,177	271,637,284	1,134,893
NGWE YI PALE MINING COMPANY LIMITED	322,346,818	323,040,656	(693,838)	-	-	-	322,346,818	323,040,656	(693,838.00)
NEW DAYS ASIA MINING COMPANY LIMITED	422,356,390	437,016,021	(14,659,631)	-	-	-	422,356,390	437,016,021	(14,659,631)
HTOO INTERNATIONAL INDUSTRY GROUP COMPANY LIMITED	665,170,868	573,874,309	91,296,559	(55,336,099)	35,960,460	(91,296,559)	609,834,769	609,834,769	-
HARBOR STAR MINING COMPANY LIMITED	368,941,208	353,740,017	15,201,191	-	-	-	368,941,208	353,740,017	15,201,191
MANDALAY GOLDEN FRIEND MINING CO., LTD.	690,403,498	240,186,800	450,216,698	(444,239,870)	9,114,000	(453,353,870)	246,163,628	249,300,800	(3,137,172.00)
MYANMAR GOLDEN POINT FAMILY CO., LTD.	117,414,051	97,709,591	19,704,461	-	38,841,383	(38,841,383)	117,414,051	136,550,973	(19,136,922)
THAN TAW MYAT COMPANY LIMITED	533,637,504	506,635,428	27,002,076	-	-	-	533,637,504	506,635,428	27,002,076.00
TUN THWIN MINING COMPANY LIMITED	-	399,189,602	(399,189,602)	-	-	-	-	399,189,602	(399,189,602)
MANDALAY DISTRIBUTION & MINING COMPANY LIMITED	525,493,595	486,160,480	39,333,115	-	51,055,119	(51,055,119)	525,493,595	537,215,599	(11,722,004.00)
YCDC	341,219,416	279,646,416	61,573,000	2,000	61,575,000	(61,573,000)	341,221,416	341,221,416	-
SAN LIN INTERNATIONAL EXPORT & IMPORT COMPANY LIMITED	18,489,200	268,471,706	(249,982,506)	-	-	-	18,489,200	268,471,706	(249,982,506.46)
KAN PWINT OO MINING COMPANY LIMITED	4,278,000	264,186,549	(259,908,549)	-	-	-	4,278,000	264,186,549	(259,908,549)
TOP TEN STAR PRODUCTION CO., LTD.	484,138,329	512,940,126	(28,801,798)	46,638,204	12,284,204	34,354,000	530,776,533	525,224,330	5,552,202.43
HEAY HEIN COMPANY LIMITED	398,062,267	251,408,379	146,653,888	(109,649,287)	36,968,601	(146,617,888)	288,412,980	288,376,980	36,000
NGWE KABAR MYANMAR COMPANY LIMITED	34,096,456	49,182,178	(15,085,722)	-	18,995,267	(18,995,267)	34,096,456	68,177,445	(34,080,989.00)
MYAUK KYUN THU MA MA MINING & REFINERY COMPANY LIMITED	59,428,081	91,532,786	(32,104,705)	-	7,510,774	(7,510,774)	59,428,081	99,043,560	(39,615,479)
XIE SHAN MINING PRODUCTION & MARKETING COMPANY LIMITED	214,551,626	197,083,275	17,468,351	-	13,561,400	(13,561,400)	214,551,626	210,644,675	3,906,950.81
DRAGON CEMENT COMPANY LIMITED	959,803,080	1,045,294,469	(85,491,389)	84,867,389	-	84,867,389	1,044,670,469	1,045,294,469	(624,000)
PRINCE MANUFACTURING COMPANY LIMITED	15,162,500	170,761,347	(155,598,847)	155,297,847	-	155,297,847	170,460,347	170,761,347	(301,000.00)
HTAT YEE LINN MINING & REFINERY COMPANY LIMITED	9,121,550	33,641,002	(24,519,452)	1,201,000	-	1,201,000	10,322,550	33,641,002	(23,318,452)
MYAY NAGAR MINING COMPANY LIMITED	210,358,976	191,846,448	18,512,527	-	-	-	210,358,976	191,846,448	18,512,527.16
THA BYU MINING COMPANY LIMITED	-	161,660,648	(161,660,648)	-	-	-	-	161,660,648	(161,660,648)
YE HTUT KYAW MINING COMPANY LIMITED	192,209,067	204,402,764	(12,193,697)	-	-	-	192,209,067	204,402,764	(12,193,696.81)



Company	Templates originally lodged			Adjustments			Final amounts		
	Extractive company (a)	Government (b)	Difference (c) = (a - b)	Extractive company (d)	Government €	Difference (f) = (d-e)	Extractive company (g) = (a+d)	Government (h) = (b+e)	Difference (i) = (g-h)
MYANMAR TIN -TUNGSTEN COMPANY LIMITED	6,250,909	12,618,579	(6,367,670)	(6,250,909)	-	(6,250,909)	-	12,618,579	(12,618,579)
Myanmar Yang Tse Copper Ltd	34,264,571,096	12,517,659,788	21,746,911,308	-	21,750,062,239	(21,750,062,239)	34,264,571,096	34,267,722,027	(3,150,930.99)
Eden Energy & Natural Resources Development Co., Ltd	2,215,294,480	4,088,050,663	(1,872,756,183)	1,866,393,673	-	1,866,393,673	4,081,688,153	4,088,050,663	(6,362,510)
Kanbawza Industries Ltd	776,181,732	850,561,773	(74,380,041)	69,767,168	-	69,767,168	845,948,900	850,561,773	(4,612,873.00)
MYANMAR WANBAO MINING COPPER LTD	3,029,141,299	1,140,897,131	1,888,244,168	(40,984,753)	1,844,416,830	(1,885,401,583)	2,988,156,546	2,985,313,961	2,842,585
HTAR WA YA	-	1,843,308,058	(1,843,308,058)	-	-	-	-	1,843,308,058	(1,843,308,057.84)
MYANMAR CNMC NICKEL COMPANY LIMITED	28,911,507,781	325,912,582	28,585,595,199	(28,157,745,591)	427,519,787	(28,585,265,378)	753,762,189	753,432,369	329,820
24 HOUR MINING & INDUSTRY COMPANY LIMITED	96,629,424	75,485,600	21,143,824	-	-	-	96,629,424	75,485,600	21,143,824.00
A & A NATURAL RESOURCES DEVELOPMENT CO., LTD	1,880,658	518,802	1,361,856	-	-	-	1,880,658	518,802	1,361,856
ASIA PHYO MINING COMPANY LIMITED	18,827,503	18,516,803	310,700	-	-	-	18,827,503	18,516,803	310,700.00
BLUE DIAMOND CEMENT COMPANY LIMITED	373,587,885	662,649,968	(289,062,083)	688,559,924	382,921,599	305,638,325	1,062,147,809	1,045,571,566	16,576,243
DAGON MINING COMPANY LIMITED	67,545,613	116,488,009	(48,942,396)	42,749,800	-	42,749,800	110,295,413	116,488,009	(6,192,596.00)
DIAMOND SHARK MINING COMPANY LIMITED	48,809,520	48,516,000	293,520	-	-	-	48,809,520	48,516,000	293,520
Directorate of Military office of Chief of Defence Industries, Ministry of Defence	-	15,931,840	(15,931,840)	-	-	-	-	15,931,840	(15,931,840.00)
GREEN ASIA COMPANY LIMITED	4,843,200	6,567,200	(1,724,000)	-	-	-	4,843,200	6,567,200	(1,724,000)
GREEN STRATEGIC MINING COMPANY LIMITED	-	6,407,600	(6,407,600)	-	-	-	-	6,407,600	(6,407,600.00)
GROUP OF FOUR MINING COMPANY LIMITED	142,368,638	154,371,786	(12,003,148)	-	-	-	142,368,638	154,371,786	(12,003,148)
HTUT KHAUNG KYAW MINING COMPANY LIMITED	34,734,543	39,618,218	(4,883,675)	-	-	-	34,734,543	39,618,218	(4,883,675.00)
JUNE CEMENT INDUSTRY LTD.	29,708,624	49,003,638	(19,295,014)	-	-	-	29,708,624	49,003,638	(19,295,014)
LINN PYAE MINING COMPANY LIMITED	41,569,426	41,911,518	(342,092)	(0)	-	(0)	41,569,426	41,911,518	(342,091.99)
LOI CHAI NAGAR MINING COMPANY LIMITED	429,548,079	418,708,883	10,839,196	(14,112,000)	-	(14,112,000)	415,436,079	418,708,883	(3,272,804)
MAY FLOWER MINING ENTERPRISES LIMITED	31,163,776	25,163,776	6,000,000	-	-	-	31,163,776	25,163,776	6,000,000.00
MINING WORLD COMPANY LIMITED	-	107,467,210	(107,467,210)	-	-	-	-	107,467,210	(107,467,210)
MOUNT CHING YING MINING COMPANY LIMITED	47,585,200	47,585,200	-	-	-	-	47,585,200	47,585,200	-

Company	Templates originally lodged			Adjustments			Final amounts		
	Extractive company (a)	Government (b)	Difference (c) = (a - b)	Extractive company (d)	Government €	Difference (f) = (d-e)	Extractive company (g) = (a+d)	Government (h) = (b+e)	Difference (i) = (g-h)
MYANMAR APEX MINING CO., LTD	2,570,379,075	2,620,957,032	(50,577,957)	-	(3,000,000)	3,000,000	2,570,379,075	2,617,957,032	(47,577,957)
MYANMAR NAING GROUP MINING COMPANY LTD	51,266,488	45,613,400	5,653,088	-	-	-	51,266,488	45,613,400	5,653,088.00
MYANMAR SIMCO SONG DA JOINT STOK COMPANY LIMITED	5,838,204	6,093,992	(255,788)	-	-	-	5,838,204	6,093,992	(255,788)
MYINT INVESTMENT GROUP COMPANY LIMITED	147,139,768	70,437,645	76,702,123	-	73,359,589	(73,359,589)	147,139,768	143,797,234	3,342,534.00
No.(3) Heavy Industry. Ministry Of Industry	-	13,021,700	(13,021,700)	-	-	-	-	13,021,700	(13,021,700)
SHWE PAUK PAUK MINING COMPANY LIMITED	128,711,140	13,179,849	115,531,291	(22,300,000)	93,877,500	(116,177,500)	106,411,140	107,057,349	(646,209.00)
SHWE PIN LE MINING & INDUSTRY COMPANY LIMITED	-	87,770,346	(87,770,346)	-	-	-	-	87,770,346	(87,770,346)
SILVER BRIGHT COMPANY LIMITED	56,292,601	56,545,280	(252,679)	-	-	-	56,292,601	56,545,280	(252,679.14)
THE SILVER LION MINING COMPANY LIMITED	148,500	1,010,150	(861,650)	-	-	-	148,500	1,010,150	(861,650)
THIHA THANT HEIN MINING COMPANY LIMITED	142,476,486	133,384,943	9,091,543	-	-	-	142,476,486	133,384,943	9,091,543.14
TRIPLE "A" CEMENT INTERNATIONAL COMPANY LIMITED	121,022,172	280,144,459	(159,122,287)	-	-	-	121,022,172	280,144,459	(159,122,287)
U E EXPORT IMPORT COMPANY LIMITED	159,397,328	146,205,328	13,192,000	-	-	-	159,397,328	146,205,328	13,192,000.00
UNITED CEMENT COMPANY LIMITED	-	15,548,418	(15,548,418)	-	-	-	-	15,548,418	(15,548,418)
YIG COMPANY LIMITED	5,976,250	113,306,600	(107,330,350)	-	-	-	5,976,250	113,306,600	(107,330,350.00)
YOUNG INVESTMENT GROUP COMPANY LIMITED	135,548,771	20,885,760	114,663,011	-	113,125,800	(113,125,800)	135,548,771	134,011,560	1,537,211
SEA SUN STAR MINING PRODUCTION & MARKETING COMPANY LIMITED	-	8,600,000	(8,600,000)	-	-	-	-	8,600,000	(8,600,000.00)
ZABU TALU MINING COMPANY LIMITED	4,030,800	352,800	3,678,000	-	-	-	4,030,800	352,800	3,678,000
RUBY DRAGON MINING COMPANY LIMITED	60,325,772	47,019,728	13,306,044	-	-	-	60,325,772	47,019,728	13,306,044.00
SEIN CHI LIN MINING CO., LTD.	53,090,780	71,836,597	(18,745,817)	-	-	-	53,090,780	71,836,597	(18,745,817)
AUNG HTUN LINN SHEIN WIN MINING & REFINERY COMPANY LIMITED	4,979,288	76,479,561	(71,500,273)	50,429,561	-	50,429,561	55,408,849	76,479,561	(21,070,712.00)
Future Mining Co.,Ltd	-	6,261,244	(6,261,244)	-	-	-	-	6,261,244	(6,261,244)
Future Engineering Gold Mining	-	3,000,000	(3,000,000)	-	-	-	-	3,000,000	(3,000,000.00)
SHWE MYINT THAUNG YINN INDUSTRY & MANUFACTURING COMPANY LIMITED	-	926,432	(926,432)	-	-	-	-	926,432	(926,432)
MYANMAR MYO KO KO MEDICAL INSTRUMENT COMPANY LIMITED	-	75,209	(75,209)	-	-	-	-	75,209	(75,209.00)
SAT WINE INN ARR MINING COMPANY LIMITED	-	39,272,123	(39,272,123)	-	-	-	-	39,272,123	(39,272,123)

Company	Templates originally lodged			Adjustments			Final amounts		
	Extractive company (a)	Government (b)	Difference (c) = (a - b)	Extractive company (d)	Government €	Difference (f) = (d-e)	Extractive company (g) = (a+d)	Government (h) = (b+e)	Difference (i) = (g-h)
SHWE SAPAR MINING COMPANY LIMITED	46,800,880	1,500,000	45,300,880	(3,527,786)	34,273,094	(37,800,880)	43,273,094	35,773,094	7,500,000.00
NAN KANAUNG MINING & ENGINEERING COMPANY LIMITED	11,253,003	10,914,708	338,295	-	-	-	11,253,003	10,914,708	338,295
NEW ERA GOLD COMPANY LIMITED	1,224,726	2,494,650	(1,269,924)	-	-	-	1,224,726	2,494,650	(1,269,924.00)
SHWE PYI NAGAR COMPANY LIMITED	13,182,400	11,457,300	1,725,100	-	-	-	13,182,400	11,457,300	1,725,100
<b>Total</b>	<b>119,680,259,383</b>	<b>85,584,660,394</b>	<b>34,095,598,989</b>	<b>(13,579,497,224)</b>	<b>25,148,216,517</b>	<b>(38,727,713,740)</b>	<b>106,100,762,159</b>	<b>110,732,876,911</b>	<b>(4,632,114,751)</b>

### 5.3.2. Cash flows reconciliation by revenue stream

The table below shows the total Payments reported by extractive companies and Government Agencies, taking into account all adjustments:

Table 128: Other minerals payments reconciliation per tax

Amounts in MMK

Description	Templates originally lodged			Adjustments			Final amounts		
	Extractive company (a)	Government (b)	Difference (c) = (a - b)	Extractive company (d)	Government €	Difference (f) = (d-H)	Extractive company (g) = (a+d)	Government (h) = (b+H)	Difference (i) = (g-h)
<b>MoF-Customs Department</b>	<b>13,895,191,650</b>	<b>2,224,354,622</b>	<b>11,670,837,027</b>	<b>(9,714,237,488)</b>	<b>1,862,243,452</b>	<b>(11,576,480,940)</b>	<b>4,180,954,162</b>	<b>4,086,598,075</b>	<b>94,356,087</b>
Customs Duties	1,594,449,823	2,224,354,622	(629,904,799)	563,052,454	30,278,022	532,774,432	2,157,502,278	2,254,632,645	(97,130,367)
Commercial Tax on Imports	4,182,870,646	-	4,182,870,646	(2,349,619,501)	1,831,965,430	(4,181,584,931)	1,833,251,144	1,831,965,430	1,285,714.09
Corporate Income Tax	8,117,871,181	-	8,117,871,181	(7,927,670,441)	-	(7,927,670,441)	190,200,740	-	190,200,740
<b>MoF-IRD</b>	<b>62,577,128,317</b>	<b>57,300,283,495</b>	<b>5,276,844,823</b>	<b>19,671,037,994</b>	<b>27,297,008,267</b>	<b>(7,625,970,273)</b>	<b>82,248,166,312</b>	<b>84,597,291,762</b>	<b>(2,349,125,451)</b>
Corporate Income Tax	49,018,725,187	36,196,834,731	12,821,890,456	11,864,212,497	25,747,918,386	(13,883,705,889)	60,882,937,684	61,944,753,117	(1,061,815,433.02)
Commercial Tax	10,946,488,861	19,512,753,469	(8,566,264,608)	9,028,848,247	1,577,095,546	7,451,752,701	19,975,337,108	21,089,849,014	(1,114,511,907)
Capital Gains Tax	300,000	6,768,948	(6,468,948)	6,768,948	-	6,768,948	7,068,948	6,768,948	300,000.00
Withholding Tax	925,790,907	329,676,849	596,114,058	(775,092,941)	(1,530,661)	(773,562,280)	150,697,966	328,146,188	(177,448,222)
Stamp Duties	15,445,100	-	15,445,100	-	12,451,400	(12,451,400)	15,445,100	12,451,400	2,993,700.00
Specific Goods Tax	1,445,371,302	1,254,249,497	191,121,805	(230,048,208)	(38,926,403)	(191,121,805)	1,215,323,094	1,215,323,094	-
Other significant payments (> USD 50,000)	225,006,960	-	225,006,960	(223,650,549)	-	(223,650,549)	1,356,411	-	1,356,411.00
<b>Department of Mining (DOM)</b>	<b>32,437,896,895</b>	<b>7,849,459,087</b>	<b>24,588,437,808</b>	<b>(29,178,698,052)</b>	<b>(4,032,894,517)</b>	<b>(25,145,803,535)</b>	<b>3,259,198,843</b>	<b>3,816,564,570</b>	<b>(557,365,727)</b>
Royalties	30,655,015,086	5,606,075,399	25,048,939,687	(29,506,660,186)	(4,179,053,411)	(25,327,606,775)	1,148,354,900	1,427,021,988	(278,667,088)
Dead Rent Fees	1,768,641,809	2,214,494,028	(445,852,219)	319,797,134	146,158,894	173,638,240	2,088,438,943	2,360,652,922	(272,213,979.04)
Licence Fees	14,240,000	28,889,660	(14,649,660)	8,165,000	-	8,165,000	22,405,000	28,889,660	(6,484,660)
<b>DGSE</b>	<b>-</b>	<b>5,000,000</b>	<b>(5,000,000)</b>	<b>5,000,000</b>	<b>-</b>	<b>5,000,000</b>	<b>5,000,000</b>	<b>5,000,000</b>	<b>-</b>
Application Fees	-	5,000,000	(5,000,000)	5,000,000	-	5,000,000	5,000,000	5,000,000	-

Description	Templates originally lodged			Adjustments			Final amounts		
	Extractive company (a)	Government (b)	Difference (c) = (a - b)	Extractive company (d)	Government €	Difference (f) = (d-H)	Extractive company (g) = (a+d)	Government (h) = (b+H)	Difference (i) = (g-h)
<b>Forest Department -</b>	<b>629,545,982</b>	<b>-</b>	<b>629,545,982</b>	<b>-</b>	<b>485,383,972</b>	<b>(485,383,972)</b>	<b>629,545,982</b>	<b>485,383,972</b>	<b>144,162,010</b>
Land rental fees	629,268,482	-	629,268,482	-	485,383,972	(485,383,972)	629,268,482	485,383,972	143,884,510
Environmental / Plantation fees	277,500	-	277,500	-	-	-	277,500	-	277,500.00
<b>Mining Enterprises (ME1 &amp; ME2)</b>	<b>10,140,496,539</b>	<b>18,205,563,190</b>	<b>(8,065,066,651)</b>	<b>5,637,400,323</b>	<b>(463,524,658)</b>	<b>6,100,924,981</b>	<b>15,777,896,861</b>	<b>17,742,038,532</b>	<b>(1,964,141,671)</b>
Production Split	7,303,022,841	13,900,077,484	(6,597,054,643)	4,190,576,516	(573,224,658)	4,763,801,174	11,493,599,357	13,326,852,826	(1,833,253,469)
Application Fee	190,188,507	348,875,460	(158,686,953)	161,000,000	102,500,000	58,500,000	351,188,507	451,375,460	(100,186,953.00)
Other fees (penalty/rental of machinery) ME2	290,503,315	553,501,982	(262,998,667)	262,307,107	7,200,000	255,107,107	552,810,422	560,701,982	(7,891,560)
Other significant payments (> USD 50,000) ME	2,356,781,875	3,403,108,264	(1,046,326,389)	1,023,516,700	-	1,023,516,700	3,380,298,575	3,403,108,264	(22,809,688.60)
<b>Social payments</b>	<b>8,724,266,805</b>	<b>-</b>	<b>8,724,266,805</b>	<b>(29,516,700)</b>	<b>-</b>	<b>(29,516,700)</b>	<b>8,694,750,105</b>	<b>-</b>	<b>8,694,750,105</b>
Mandatory Corporate Social Responsibility	994,040,220	-	994,040,220	-	-	-	994,040,220	-	994,040,220.00
Voluntary Corporate Social Responsibility	7,420,923,085	-	7,420,923,085	-	-	-	7,420,923,085	-	7,420,923,085
Other significant payments (> USD 50,000) SP	309,303,500	-	309,303,500	(29,516,700)	-	(29,516,700)	279,786,800	-	279,786,800.00
<b>Total</b>	<b>119,680,259,383</b>	<b>85,584,660,394</b>	<b>34,095,598,989</b>	<b>(13,579,497,224)</b>	<b>25,148,216,517</b>	<b>(38,727,713,740)</b>	<b>106,100,762,159</b>	<b>110,732,876,911</b>	<b>(4,632,114,751)</b>

### 5.3.3. Adjustments to the reporting templates

#### Adjustments to the companies reporting templates

##### Adjustments per companies

The detail of the adjustments performed to the companies RT detailed per companies is presented below:

Table 129: Companies payments adjustments

Amounts in MMK

Company	Tax paid not reported	Tax paid reported but outside the period covered	Tax paid reported but outside the reconciliation scope	Tax amount incorrectly reported	Tax reported but not paid	Tax incorrectly classified	Tax paid on other identification number	Total Extractive company Adjustments
NATIONAL PROSPERITY COMPANY LIMITED	1,011,492,374	-	-	-	-	-	-	1,011,492,374
MYANMAR ECONOMIC CORPORATION LIMITED	7,996,093,944	-	-	-	-	-	-	7,996,093,944
GEO ASIA INDUSTRY & MINING COMPANY LIMITED	44,839,180	-	-	-	-	-	-	44,839,180
CORNERSTONE RESOURCES ( MYANMAR ) LTD.	1,316,858,058	-	-	-	-	0	-	1,316,858,058
MYANMA ECONOMIC HOLDINGS PUBLIC COMPANY LIMITED	440,777,364	-	-	-	-	-	-	440,777,364
KAYAH STATE MINERAL PRODUCTION COMPANY LIMITED	8,486,100	-	(41,898,703)	-	-	-	-	(33,412,603)
GPS JOINT VENTURE COMPANY LIMITED	12,019,200	-	-	-	-	-	-	12,019,200
SHWE TAUNG MINING COMPANY LIMITED	30,412,923	-	-	-	-	-	-	30,412,923
DELCO LIMITED	34,792,059	-	-	-	-	-	-	34,792,059
MAX (MYANMAR) COMPANY LIMITED	86,899,388	-	-	5,621,540	-	(21,579,000)	-	70,941,928
FIRST RESOURCES COMPANY LIMITED	182,321,082	-	-	-	-	-	-	182,321,082
WIN MYINT MO INDUSTRIES COMPANY LIMITED	1,087,669,428	-	-	-	-	-	-	1,087,669,428
No.(2)Heavy Industry, Ministry of Industry	52,356,560	-	-	-	-	-	-	52,356,560
MYANMAR PONGPIPAT COMPANY LIMITED	25,560,000	-	-	(3,978,993)	-	-	-	21,581,007
HTOO INTERNATIONAL INDUSTRY GROUP COMPANY LIMITED	15,268,097	-	-	(70,604,196)	-	-	-	(55,336,099)
MANDALAY GOLDEN FRIEND MINING CO., LTD.	-	(193,485,600)	-	(250,754,270)	-	-	-	(444,239,870)

YCDC	2,000	-	-	-	-	-	-	2,000
TOP TEN STAR PRODUCTION CO., LTD.	46,638,204	-	-	-	-	-	-	46,638,204
HEAY HEIN COMPANY LIMITED	-	(49,439,994)	-	(60,209,293)	-	-	-	(109,649,287)
DRAGON CEMENT COMPANY LIMITED	34,918,000	-	-	49,949,389	-	-	-	84,867,389
PRINCE MANUFACTURING COMPANY LIMITED	159,495,147	-	-	(4,197,300)	-	-	-	155,297,847
HTAT YEE LINN MINING & REFINERY COMPANY LIMITED	1,201,000	-	-	-	-	-	-	1,201,000
MYANMAR TIN -TUNGSTEN COMPANY LIMITED	-	(6,250,909)	-	-	-	-	-	(6,250,909)
Eden Energy & Natural Resources Development Co., Ltd	2,495,073,866	(628,680,193)	-	-	-	-	-	1,866,393,673
Kanbawza Industries Ltd	115,803,324	-	-	(46,036,156)	-	-	-	69,767,168
MYANMAR WANBAO MINING COPPER LTD	72,097,939	(113,082,692)	-	-	-	-	-	(40,984,753)
MYANMAR CNMC NICKEL COMPANY LIMITED	-	-	-	(27,934,095,042)	(223,650,549)	-	-	(28,157,745,591)
BLUE DIAMOND CEMENT COMPANY LIMITED	688,559,924	-	-	-	-	-	-	688,559,924
DAGON MINING COMPANY LIMITED	42,749,800	-	-	-	-	-	-	42,749,800
LOI CHAI NAGAR MINING COMPANY LIMITED	3,528,000	(17,640,000)	-	-	-	-	-	(14,112,000)
SHWE PAUK PAUK MINING COMPANY LIMITED	-	-	-	-	-	-	(22,300,000)	(22,300,000)
AUNG HTUN LINN SHEIN WIN MINING & REFINERY COMPANY LIMITED	50,429,561	-	-	-	-	-	-	50,429,561
SHWE SAPAR MINING COMPANY LIMITED	-	(3,527,786)	-	-	-	-	-	(3,527,786)
<b>Total</b>	<b>16,056,342,523</b>	<b>(1,012,107,174)</b>	<b>(41,898,703)</b>	<b>(28,314,304,321)</b>	<b>(223,650,549)</b>	<b>(21,579,000)</b>	<b>(22,300,000)</b>	<b>(13,579,497,224)</b>

## Adjustments per tax

The detail of the adjustments performed to the companies RT detailed per payment flows is presented below:

Table 129: Companies payments adjustments

Amounts in MMK

N°	Revenus streams	Tax paid not reported	Tax paid reported but outside the period covered	Tax paid reported but outside the reconciliation scope	Tax amount incorrectly reported	Tax reported but not paid	Tax incorrectly classified	Tax paid on other identification number	Total Extractive company Adjustments
	<b>MoF-Customs Department</b>	<b>563,052,454</b>	<b>(113,082,692)</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>(10,164,207,250)</b>	<b>-</b>	<b>(9,714,237,488)</b>
2	Customs Duties	563,052,454	-	-	-	-	-	-	563,052,454
3	Commercial Tax on Imports	-	(113,082,692)	-	-	-	(2,236,536,809)	-	(2,349,619,501)
4	Corporate Income Tax (Advance income tax 2%)	-	-	-	-	-	(7,927,670,441)	-	(7,927,670,441)
	<b>MoF-IRD</b>	<b>10,678,075,054</b>	<b>(632,904,587)</b>	<b>-</b>	<b>(270,810,174)</b>	<b>(223,650,549)</b>	<b>10,142,628,250</b>	<b>(22,300,000)</b>	<b>19,671,037,994</b>
7	Corporate Income Tax	3,679,553,702	(464,404,587)	-	(46,700,000)	-	8,702,763,382	(7,000,000)	11,864,212,497
8	Commercial Tax	6,991,752,403	(168,500,000)	-	5,938,034	-	2,214,957,809	(15,300,000)	9,028,848,247
9	Capital Gains Tax	6,768,948	-	-	-	-	-	-	6,768,948
10	Withholding Tax	-	-	-	-	-	(775,092,941)	-	(775,092,941)
12	Specific Goods Tax (IRD)	-	-	-	(230,048,208)	-	-	-	(230,048,208)
13	Other significant payments (> USD 50,000) IRD	-	-	-	-	(223,650,549)	-	-	(223,650,549)
	<b>Department of Mining (DOM)</b>	<b>425,622,067</b>	<b>(12,658,695)</b>	<b>(41,898,703)</b>	<b>(27,968,910,958)</b>	<b>-</b>	<b>(1,580,851,764)</b>	<b>-</b>	<b>(29,178,698,052)</b>
14	Royalties	156,779,121	(2,880,000)	-	(27,964,713,658)	-	(1,695,845,649)	-	(29,506,660,186)
15	Dead Rent Fees	260,677,946	(9,778,695)	(41,898,703)	(4,197,300)	-	114,993,885	-	319,797,134



N°	Revenus streams	Tax paid not reported	Tax paid reported but outside the period covered	Tax paid reported but outside the reconciliation scope	Tax amount incorrectly reported	Tax reported but not paid	Tax incorrectly classified	Tax paid on other identification number	Total Extractive company Adjustments
16	Licence Fees	8,165,000	-	-	-	-	-	-	8,165,000
	Department of Geological Survey and Mining Exploration (DGSE)	-	-	-	-	-	5,000,000	-	5,000,000
17	Application Fees	-	-	-	-	-	5,000,000	-	5,000,000
	MoM (ME 1-ME 2-ME 3)	4,389,592,948	(253,461,200)	-	(74,583,189)	-	1,575,851,764	-	5,637,400,323
20	Production Split	2,933,790,148	(253,461,200)	-	(70,604,196)	-	1,580,851,764	-	4,190,576,516
21	Application Fee	166,000,000	-	-	-	-	(5,000,000)	-	161,000,000
22	Other fees (penalty/rental of machinery) ME2	266,286,100	-	-	(3,978,993)	-	-	-	262,307,107
23	Other significant payments (> USD 50,000) ME	1,023,516,700	-	-	-	-	-	-	1,023,516,700
	Social payments								
27	Other significant payments (> USD 50,000) SP	-	-	(29,516,700)	-	-	-	-	(29,516,700)
		16,056,342,523	(1,012,107,174)	(41,898,703)	(28,314,304,321)	(223,650,549)	(21,579,000)	(22,300,000)	(13,579,497,224)

## Adjustments to the government reporting templates

### Adjustments per companies

The detail of the adjustments performed to the government agencies RT detailed per companies is presented below:

**Table 130: Government payments adjustments**

*Amounts in MMK*

Company	Tax received not reported	Tax received reported but outside the period covered	Tax received reported but outside the reconciliation scope	Tax amount incorrectly reported	Total Extractive company Adjustments
NATIONAL PROSPERITY COMPANY LIMITED	150,899,348	-	-	(345,710,986)	(194,811,638)
MYANMAR ECONOMIC CORPORATION LIMITED	205,966,488	-	-	(38,926,403)	167,040,085
GEO ASIA INDUSTRY & MINING COMPANY LIMITED	-	-	-	(1,138,791,011)	(1,138,791,011)
CORNERSTONE RESOURCES ( MYANMAR ) LTD.	26,283,466	-	-	-	26,283,466
ETERNAL MINING COMPANY LIMITED	573,546,736	-	-	(90,821,308)	482,725,428
KAYAH STATE MINERAL PRODUCTION COMPANY LIMITED	-	-	-	(192,980,210)	(192,980,210)
SHWE TAUNG MINING COMPANY LIMITED	29,673,000	(10,000,000)	-	-	19,673,000
DELCO LIMITED	39,787,191	-	-	(152,396,792)	(112,609,601)
MAX (MYANMAR) COMPANY LIMITED	903,385,145	-	-	(21,579,000)	881,806,145
FIRST RESOURCES COMPANY LIMITED	287,894,215	-	-	-	287,894,215
MYANMAR PONGPIPAT COMPANY LIMITED	-	-	-	(80,436,008)	(80,436,008)
HTOO INTERNATIONAL INDUSTRY GROUP COMPANY LIMITED	45,960,460	-	-	(10,000,000)	35,960,460
MANDALAY GOLDEN FRIEND MINING CO., LTD.	9,114,000	-	-	-	9,114,000
MYANMAR GOLDEN POINT FAMILY CO., LTD.	60,202,500	-	-	(21,361,117)	38,841,383
MANDALAY DISTRIBUTION & MINING COMPANY LIMITED	51,055,119	-	-	-	51,055,119
YCDC	61,575,000	-	-	-	61,575,000
TOP TEN STAR PRODUCTION CO., LTD.	12,284,204	-	-	-	12,284,204
HEAY HEIN COMPANY LIMITED	36,968,601	-	-	-	36,968,601
NGWE KABAR MYANMAR COMPANY LIMITED	18,995,267	-	-	-	18,995,267

Company	Tax received not reported	Tax received reported but outside the period covered	Tax received reported but outside the reconciliation scope	Tax amount incorrectly reported	Total Extractive company Adjustments
MYAUK KYUN THU MA MA MINING & REFINERY COMPANY LIMITED	7,510,774	-	-	-	7,510,774
XIE SHAN MINING PRODUCTION & MARKETING COMPANY LIMITED	13,561,400	-	-	-	13,561,400
Myanmar Yang Tse Copper Ltd	24,907,858,218	-	-	(3,157,795,979)	21,750,062,239
MYANMAR WANBAO MINING COPPER LTD	1,844,416,830	-	-	-	1,844,416,830
MYANMAR CNMC NICKEL COMPANY LIMITED	427,519,787	-	-	-	427,519,787
BLUE DIAMOND CEMENT COMPANY LIMITED	388,970,911	-	-	(6,049,312)	382,921,599
MYANMAR APEX MINING CO., LTD	-	-	(3,000,000)	-	(3,000,000)
MYINT INVESTMENT GROUP COMPANY LIMITED	73,359,589	-	-	-	73,359,589
SHWE PAUK PAUK MINING COMPANY LIMITED	93,877,500	-	-	-	93,877,500
YOUNG INVESTMENT GROUP COMPANY LIMITED	113,125,800	-	-	-	113,125,800
SHWE SAPAR MINING COMPANY LIMITED	34,273,094	-	-	-	34,273,094
<b>Total</b>	<b>30,418,064,643</b>	<b>(10,000,000)</b>	<b>(3,000,000)</b>	<b>(5,256,848,126)</b>	<b>25,148,216,517</b>

## Adjustments per tax

The detail of the adjustments performed to the government agencies RT detailed per tax is presented below :

Amounts in MMK						
No.	Company	Tax received not reported	Tax received reported but outside the period covered	Tax received reported but outside the reconciliation scope	Tax amount incorrectly reported	Total Extractive company Adjustments
<b>MoF-Customs Department</b>		<b>1,868,292,764</b>	<b>-</b>	<b>-</b>	<b>(6,049,312)</b>	<b>1,862,243,452</b>
2	Customs Duties	36,327,334	-	-	(6,049,312)	30,278,022
3	Commercial Tax on Imports	1,831,965,430	-	-	-	1,831,965,430
<b>MoF-IRD</b>		<b>27,377,513,671</b>	<b>(10,000,000)</b>	<b>-</b>	<b>(70,505,403)</b>	<b>27,297,008,267</b>
7	Corporate Income Tax	25,718,300,340	-	-	-	25,718,300,340
8	Commercial Tax	1,646,761,931	(10,000,000)	-	(31,579,000)	1,605,182,931
11	Stamp Duties	12,451,400	-	-	-	12,451,400
12	Specific Goods Tax (IRD)	-	-	-	(38,926,403)	(38,926,403)
<b>Department of Mining (DOM)</b>		<b>147,398,894</b>	<b>-</b>	<b>-</b>	<b>(4,180,293,411)</b>	<b>(4,032,894,517)</b>
14	Royalties	1,240,000	-	-	(4,180,293,411)	(4,179,053,411)
15	Dead Rent Fees	146,158,894	-	-	-	146,158,894
<b>Forest Department</b>		<b>485,383,972</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>485,383,972</b>
18	Land rental fees	485,383,972	-	-	-	485,383,972
19	Environmental / Plantation fees	-	-	-	-	-
<b>MoM (ME 1-ME 2-ME 3)</b>		<b>539,475,342</b>	<b>-</b>	<b>(3,000,000)</b>	<b>(1,000,000,000)</b>	<b>(463,524,658)</b>
20	Production Split	426,775,342	-	-	(1,000,000,000)	(573,224,658)
21	Application Fee	102,500,000	-	-	-	102,500,000
22	Other fees (penalty/rental of machinery) ME2	10,200,000	-	(3,000,000)	-	7,200,000
		<b>30,418,064,643</b>	<b>(10,000,000)</b>	<b>(3,000,000)</b>	<b>(5,256,848,126)</b>	<b>25,148,216,517</b>

### 5.3.4. Unreconciled discrepancies

Following our adjustments made, the total unreconciled discrepancies amounted to MMK (4,632,114,752) representing (4.18%) of total payments reported by Government Bodies. These unreconciled differences are summarised below:

#### Unreconciled discrepancies per company:

		Amounts in MMK				
Company	Unreconciled difference	Reasons for differences				Not material difference < 5 Million Kyats
		Reporting template not submitted by the extractive company	Tax not reported by the extractive company	Tax not reported by the Govt Body	Exchange rate difference	
NATIONAL PROSPERITY COMPANY LIMITED	(2,357,230)	-	(150,899,348)	148,542,118	-	-
MYANMAR ECONOMIC CORPORATION LIMITED	(57,631,118)	-	(56,916,833)	(714,286)	-	-
CORNERSTONE RESOURCES ( MYANMAR ) LTD.	103,237	-	-	-	-	103,237
MYANMA ECONOMIC HOLDINGS PUBLIC COMPANY LIMITED	(85,585,252)	-	(137,410,374)	51,825,122	-	-
KAYAH STATE MINERAL PRODUCTION COMPANY LIMITED	(531,680)	-	-	-	-	(531,680)
SHWE MOE YAN COMPANY LIMITED	(57,375,781)	-	(60,744,688)	3,368,907	-	-
GPS JOINT VENTURE COMPANY LIMITED	307,392	-	-	-	-	307,392
SHWE TAUNG MINING COMPANY LIMITED	(1,076,291)	-	-	-	-	(1,076,291)
DELCO LIMITED	200,000	-	-	-	-	200,000
MAX (MYANMAR) COMPANY LIMITED	(93,060)	-	(400,000)	-	-	306,940
PACIFIC LINK CEMENT INDUSTRIES LIMITED	(739,978,360)	(739,978,360)	-	-	-	-
WIN MYINT MO INDUSTRIES COMPANY LIMITED	(11,130,464)	-	-	-	(11,130,463)	(1)
No.(2)Heavy Industry, Ministry of Industry	(47,128,084)	-	(39,252,040)	(6,636,044)	-	(1,240,000)
MYANMAR PONGPIPAT COMPANY LIMITED	1,134,893	-	-	-	-	1,134,893
NGWE YI PALE MINING COMPANY LIMITED	(693,838)	-	(400,000)	-	-	(293,838)
NEW DAYS ASIA MINING COMPANY LIMITED	(14,659,631)	-	(30,181,380)	15,268,500	-	253,249
HARBOR STAR MINING COMPANY LIMITED	15,201,191	-	(7,346,740)	22,167,173	-	380,758
MANDALAY GOLDEN FRIEND MINING CO., LTD.	(3,137,172)	-	(600,000)	-	-	(2,537,172)
MYANMAR GOLDEN POINT FAMILY CO., LTD.	(19,136,922)	-	(19,136,922)	-	-	-
THAN TAW MYAT COMPANY LIMITED	27,002,076	-	-	24,676,356	-	2,325,720

Company	Unreconciled difference
TUN THWIN MINING COMPANY LIMITED	(399,189,602)
MANDALAY DISTRIBUTION & MINING COMPANY LIMITED	(11,722,004)
SAN LIN INTERNATIONAL EXPORT & IMPORT COMPANY LIMITED	(249,982,506)
KAN PWINT OO MINING COMPANY LIMITED	(259,908,549)
TOP TEN STAR PRODUCTION CO., LTD.	5,552,202
HEAY HEIN COMPANY LIMITED	36,000
NGWE KABAR MYANMAR COMPANY LIMITED	(34,080,989)
MYAUK KYUN THU MA MA MINING & REFINERY COMPANY LIMITED	(39,615,479)
XIE SHAN MINING PRODUCTION & MARKETING COMPANY LIMITED	3,906,951
DRAGON CEMENT COMPANY LIMITED	(624,000)
PRINCE MANUFACTURING COMPANY LIMITED	(301,000)
HTAT YEE LINN MINING & REFINERY COMPANY LIMITED	(23,318,452)
MYAY NAGAR MINING COMPANY LIMITED	18,512,527
THA BYU MINING COMPANY LIMITED	(161,660,648)
YE HTUT KYAW MINING COMPANY LIMITED	(12,193,697)
MYANMAR TIN -TUNGSTEN COMPANY LIMITED	(12,618,579)
Myanmar Yang Tse Copper Ltd	(3,150,931)
Eden Energy & Natural Resources Development Co., Ltd	(6,362,510)
Kanbawza Industries Ltd	(4,612,873)
MYANMAR WANBAO MINING COPPER LTD	2,842,585
HTAR WA YA	(1,843,308,058)
MYANMAR CNMC NICKEL COMPANY LIMITED	329,820
24 HOUR MINING & INDUSTRY COMPANY LIMITED	21,143,824
A & A NATURAL RESOURCES DEVELOPMENT CO., LTD	1,361,856
ASIA PHYO MINING COMPANY LIMITED	310,700

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Reasons for differences				
Reporting template not submitted by the extractive company	Tax not reported by the extractive company	Tax not reported by the Govt Body	Exchange rate difference	Not material difference < 5 Million Kyats
(399,189,602)	-	-	-	-
-	(12,595,090)	873,086	-	-
-	(249,982,506)	-	-	-
-	(259,859,491)	-	-	(49,058)
-	(5,418,404)	10,970,377	-	229
-	-	-	-	36,000
-	(34,021,140)	-	-	(59,849)
-	(36,227,534)	-	-	(3,387,945)
-	-	1,000,900	-	2,906,051
-	-	-	-	(624,000)
-	(1,000)	-	-	(300,000)
-	(32,440,002)	9,121,550	-	-
-	-	18,632,937	-	(120,410)
(161,660,648)	-	-	-	-
-	(13,397,497)	1,203,800	-	-
-	(12,618,579)	-	-	-
-	-	-	-	(3,150,931)
-	(1,400,000)	-	-	(4,962,510)
-	(11,017,320)	7,155,416	-	(750,969)
-	-	-	-	2,842,585
(1,843,308,058)	-	-	-	-
-	664	-	-	329,156
-	(36,965,600)	58,571,424	-	(462,000)
-	(518,802)	1,880,658	-	-
-	(5,504,400)	5,515,100	-	300,000

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EITI MYANMAR

Company	Unreconciled difference
BLUE DIAMOND CEMENT COMPANY LIMITED	16,576,243
DAGON MINING COMPANY LIMITED	(6,192,596)
DIAMOND SHARK MINING COMPANY LIMITED	293,520
Directorate of Military office of Chief of Defence Industries, Ministry of Defence	(15,931,840)
GREEN ASIA COMPANY LIMITED	(1,724,000)
GREEN STRATEGIC MINING COMPANY LIMITED	(6,407,600)
GROUP OF FOUR MINING COMPANY LIMITED	(12,003,148)
HTUT KHAUNG KYAW MINING COMPANY LIMITED	(4,883,675)
JUNE CEMENT INDUSTRY LTD.	(19,295,014)
LINN PYAE MINING COMPANY LIMITED	(342,092)
LOI CHAI NAGAR MINING COMPANY LIMITED	(3,272,804)
MAY FLOWER MINING ENTERPRISES LIMITED	6,000,000
MINING WORLD COMPANY LIMITED	(107,467,210)
MYANMAR APEX MINING CO., LTD	(47,577,957)
MYANMAR NAING GROUP MINING COMPANY LTD	5,653,088
MYANMAR SIMCO SONG DA JOINT STOK COMPANY LIMITED	(255,788)
MYINT INVESTMENT GROUP COMPANY LIMITED	3,342,534
No.(3) Heavy Industry. Ministry Of Industry	(13,021,700)
SHWE PAUK PAUK MINING COMPANY LIMITED	(646,209)
SHWE PIN LE MINING & INDUSTRY COMPANY LIMITED	(87,770,346)
SILVER BRIGHT COMPANY LIMITED	(252,679)
THE SILVER LION MINING COMPANY LIMITED	(861,650)
THIHA THANT HEIN MINING COMPANY LIMITED	9,091,543
TRIPLE "A" CEMENT INTERNATIONAL COMPANY LIMITED	(159,122,287)
U E EXPORT IMPORT COMPANY LIMITED	13,192,000

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Reasons for differences				
Reporting template not submitted by the extractive company	Tax not reported by the extractive company	Tax not reported by the Govt Body	Exchange rate difference	Not material difference < 5 Million Kyats
-	(3,888,000)	11,576,250	-	8,887,993
-	-	(6,192,596)	-	-
-	(48,516,000)	48,809,520	-	-
(15,931,840)	-	-	-	-
-	(4,107,600)	-	-	2,383,600
(6,407,600)	-	-	-	-
-	(30,267,470)	21,254,500	-	(2,990,178)
-	(6,689,676)	2,065,363	-	(259,362)
-	(16,410,414)	-	-	(2,884,600)
-	(366,182)	-	-	24,090
-	(46,301,244)	42,068,440	-	960,000
-	-	9,444,840	-	(3,444,840)
(107,467,210)	-	-	-	-
-	(219,106,797)	171,487,400	-	41,440
-	-	6,007,200	-	(354,112)
-	-	-	-	(255,788)
-	-	-	-	3,342,534
(13,021,700)	-	-	-	-
-	(742,000)	-	-	95,791
-	(87,770,346)	-	-	-
-	(654,980)	-	-	402,301
-	(767,150)	(94,500)	-	-
-	(9,114,000)	15,450,000	-	2,755,543
-	(167,169,887)	8,242,932	-	(195,332)
-	(9,310,600)	23,240,600	-	(738,000)

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EITI MYANMAR

Company	Unreconciled difference
UNITED CEMENT COMPANY LIMITED	(15,548,418)
YIG COMPANY LIMITED	(107,330,350)
YOUNG INVESTMENT GROUP COMPANY LIMITED	1,537,211
SEA SUN STAR MINING PRODUCTION & MARKETING COMPANY LIMITED	(8,600,000)
ZABU TALU MINING COMPANY LIMITED	3,678,000
RUBY DRAGON MINING COMPANY LIMITED	13,306,044
SEIN CHI LIN MINING CO., LTD.	(18,745,817)
AUNG HTUN LINN SHEIN WIN MINING & REFINERY COMPANY LIMITED	(21,070,712)
Future Mining Co.,Ltd	(6,261,244)
Future Engineering Gold Mining	(3,000,000)
SHWE MYINT THAUNG YINN INDUSTRY & MANUFACTURING COMPANY LIMITED	(926,432)
MYANMAR MYO KO KO MEDICAL INSTRUMENT COMPANY LIMITED	(75,209)
SAT WINE INN ARR MINING COMPANY LIMITED	(39,272,123)
SHWE SAPAR MINING COMPANY LIMITED	7,500,000
NAN KANAUNG MINING & ENGINEERING COMPANY LIMITED	338,295
NEW ERA GOLD COMPANY LIMITED	(1,269,924)
SHWE PYI NAGAR COMPANY LIMITED	1,725,100
<b>Total</b>	<b>(4,632,114,752)</b>

Reasons for differences				
Reporting template not submitted by the extractive company	Tax not reported by the extractive company	Tax not reported by the Govt Body	Exchange rate difference	Not material difference < 5 Million Kyats
(15,548,418)	-	-	-	-
-	(113,306,600)	5,976,250	-	-
-	-	1,356,411	-	180,800
(8,600,000)	-	-	-	-
-	-	3,678,000	-	-
-	-	8,972,000	-	4,334,044
-	(17,339,767)	3,375,000	-	(4,781,050)
-	(22,050,000)	-	-	979,288
(6,261,244)	-	-	-	-
-	(3,000,000)	-	-	-
(926,432)	-	-	-	-
(75,209)	-	-	-	-
(39,272,123)	-	-	-	-
-	-	7,500,000	-	-
-	(431,708)	770,000	-	3
-	(1,685,250)	-	-	415,326
-	(7,000,000)	8,725,100	-	-
<b>(3,357,648,445)</b>	<b>(2,031,250,696)</b>	<b>767,135,805</b>	<b>(11,130,463)</b>	<b>779,047</b>



**Reporting template not submitted by the extractive company:**

15 companies did not submit their reporting templates and for which government agencies reported payments. Those companies are:

Company	Amounts in MMK
	Amount reported by the government agencies
PACIFIC LINK CEMENT INDUSTRIES LIMITED	739,978,360
TUN THWIN MINING COMPANY LIMITED	399,189,602
THA BYU MINING COMPANY LIMITED	161,660,648
HTAR WA YA	1,843,308,058
Directorate of Military office of Chief of Defence Industries, Ministry of Defence	15,931,840
GREEN STRATEGIC MINING COMPANY LIMITED	6,407,600
MINING WORLD COMPANY LIMITED	107,467,210
No.(3) Heavy Industry. Ministry Of Industry	13,021,700
UNITED CEMENT COMPANY LIMITED	15,548,418
SEA SUN STAR MINING PRODUCTION & MARKETING COMPANY LIMITED	8,600,000
HTAY FAMILY COMPANY LIMITED	-
Future Mining Co.,Ltd	6,261,244
SHWE MYINT THAUNG YINN INDUSTRY & MANUFACTURING COMPANY LIMITED	926,432
MYANMAR MYO KO KO MEDICAL INSTRUMENT COMPANY LIMITED	75,209
SAT WINE INN ARR MINING COMPANY LIMITED	39,272,123
<b>Total</b>	<b>3,357,648,445</b>

## Unreconciled discrepancies per tax :

Amounts in MMK

No.	Revenu Stream	Unreconciled difference	Reasons for differences				
			Reporting template not submitted by the extractive company	Tax not reported by the extractive company	Tax not reported by the Govt Body	Exchange rate difference	Not material difference < 5 Million Kyats
	<b>MoF-Customs Department</b>	<b>94,356,087</b>	<b>(21,283,645)</b>	<b>(80,533,267)</b>	<b>191,486,454</b>	<b>-</b>	<b>4,686,545</b>
2	Customs Duties	(97,130,367)	(21,283,645)	(80,533,267)	-	-	4,686,545
3	Commercial Tax on Imports	1,285,714	-	-	1,285,714	-	(0)
4	Corporate Income Tax (Advance income tax 2%)	190,200,740	-	-	190,200,740	-	-
	<b>MoF-IRD</b>	<b>(2,349,125,451)</b>	<b>(1,888,027,632)</b>	<b>(733,251,304)</b>	<b>273,788,515</b>	<b>-</b>	<b>(1,635,030)</b>
7	Corporate Income Tax	(1,061,815,433)	(626,823,704)	(483,751,991)	52,602,933	-	(3,842,671)
8	Commercial Tax	(1,114,511,907)	(1,261,203,928)	(48,604,760)	195,832,740	-	(535,959)
9	Capital Gains Tax	300,000	-	-	300,000	-	-
10	Withholding Tax	(177,448,222)	-	(200,894,553)	23,446,331	-	-
11	Stamp Duties	2,993,700	-	-	250,100	-	2,743,600
13	Other significant payments (> USD 50,000) IRD	1,356,411	-	-	1,356,411	-	-
	<b>Department of Mining (DOM)</b>	<b>(557,365,727)</b>	<b>(185,211,065)</b>	<b>(469,678,830)</b>	<b>93,325,930</b>	<b>-</b>	<b>4,198,237</b>
14	Royalties	(278,667,088)	(123,300,230)	(244,434,312)	87,561,730	-	1,505,723
15	Dead Rent Fees	(272,213,979)	(60,509,835)	(221,003,858)	5,564,200	-	3,735,514
16	Licence Fees	(6,484,660)	(1,401,000)	(4,240,660)	200,000	-	(1,043,000)
	<b>Forest Department</b>	<b>144,162,010</b>	<b>-</b>	<b>-</b>	<b>144,162,010</b>	<b>-</b>	<b>-</b>
18	Land rental fees	143,884,510	-	-	143,884,510	-	-
19	Environmental / Plantation fees	277,500	-	-	277,500	-	-
	<b>MoM (ME 1-ME 2-ME 3)</b>	<b>(1,964,141,671)</b>	<b>(1,263,126,102)</b>	<b>(747,787,295)</b>	<b>64,372,895</b>	<b>(11,130,463)</b>	<b>(6,470,705)</b>
20	Production Split	(1,833,253,469)	(1,231,460,102)	(644,733,217)	43,372,895	(4,223,899)	3,790,855
21	Application Fee	(100,186,953)	(31,666,000)	(83,620,953)	21,000,000	-	(5,900,000)
22	Other fees (penalty/rental of machinery) ME2	(7,891,560)	-	(3,530,000)	-	-	(4,361,560)
23	Other significant payments (> USD 50,000) ME	(22,809,689)	-	(15,903,125)	-	(6,906,564)	-
		<b>(4,632,114,751)</b>	<b>(3,357,648,445)</b>	<b>(2,031,250,696)</b>	<b>767,135,805</b>	<b>(11,130,463)</b>	<b>779,047</b>

### 5.3.5. In Kind payment flows reconciliation

Following adjustments of in-kind payments, final differences correspond to (773) ToZ of Gold, (4) MT of Tin and 514 MT of Barite between production split reported by mining companies and ME (1) and ME (2).

The table below summarises the differences, by company, between the payments in kind reported by extractive companies and receipts reported by Government Agencies:

**Table 131: In kind payments flows reconciliation**

N°	Company	Templates originally lodged			Adjustments			Final quantities		
		Extractive company (a)	Government (b)	Difference (c) = (a - b)	Extractive company (d)	Government €	Difference (f) = (d-e)	Extractive company (g) = (a+d)	Government (h) = (b+e)	Difference (i) = (g-h)
	Gold in oz-T	9,292	8,957	337	(1,108)	-	(1,108)	8,184	8,957	(773)
1	NATIONAL PROSPERITY COMPANY LIMITED	4,553	3,961	591	(591)	-	(591)	3,961	3,961	-
3	GEO ASIA INDUSTRY & MINING COMPANY LIMITED	2,173	1,576	597	(577)	-	(577)	1,596	1,576	20
5	ETERNAL MINING COMPANY LIMITED	1,430	1,431	(1)	-	-	-	1,430	1,431	(1)
6	MYANMA ECONOMIC HOLDINGS PUBLIC COMPANY LIMITED	728	728	-	-	-	-	728	728	-
8	SHWE MOE YAN COMPANY LIMITED	-	613	(613)	-	-	-	-	613	(613)
23	MYANMAR GOLDEN POINT FAMILY CO., LTD.	261	216	45	-	-	-	261	216	45
33	MYAUK KYUN THU MA MA MINING & REFINERY COMPANY LIMITED	-	161	(161)	-	-	-	-	161	(161)
37	HTAT YEE LINN MINING & REFINERY COMPANY LIMITED	-	106	(103)	-	-	-	-	103	(103)
58	HTUT KHAUNG KYAW MINING COMPANY LIMITED	13	-	13	-	-	-	13	-	13
82	RUBY DRAGON MINING COMPANY LIMITED	86	78	8	-	-	-	86	78	8
85	AUNG HTUN LINN SHEIN WIN MINING & REFINERY COMPANY LIMITED	-	60	(60)	60	-	60	60	60	-
86	Future Engineering Gold Mining	48	27	21	-	-	-	48	27	21
	Copper in MT	11,103	12,551	(1,448)	3,606	2,158	1,448	14,709	14,709	-
6	MYANMA ECONOMIC HOLDINGS PUBLIC COMPANY LIMITED	8,945	12,551	(3,606)	3,606	-	3,606	12,551	12,551	-
42	Myanmar Yang Tse Copper Ltd	2,158	-	2,158	-	2,158	(2,158)	2,158	2,158	-
	Tin in MT	465	403	62	(69)	(3)	(66)	396	400	(4)
7	KAYAH STATE MINERAL PRODUCTION COMPANY LIMITED	146	146	-	-	-	-	146	146	-

N°	Company	Templates originally lodged			Adjustments			Final quantities		
		Extractive company	Government	Difference	Extractive company	Government	Difference	Extractive company	Government	Difference
		(a)	(b)	(c) = (a - b)	(d)	€	(f) = (d-e)	(g) = (a+d)	(h) = (b+e)	(i) = (g-h)
11	DELCO LIMITED	188	119	69	(69)	-	(69)	119	119	-
17	MYANMAR PONGPIPAT COMPANY LIMITED	79	82	(3)	-	(3)	3	79	79	-
32	NGWE KABAR MYANMAR COMPANY LIMITED	26	26	-	-	-	-	26	26	-
40	YE HTUT KYAW MINING COMPANY LIMITED	-	10	(10)	-	-	-	-	10	(10)
41	MYANMAR TIN -TUNGSTEN COMPANY LIMITED	10	10	-	-	-	-	10	10	-
53	DIAMOND SHARK MINING COMPANY LIMITED	16	-	16	-	-	-	16	-	16
63	MINING WORLD COMPANY LIMITED	-	9	(9)	-	-	-	-	9	(9)
72	SILVER BRIGHT COMPANY LIMITED	-	1	(1)	-	-	-	-	1	(1)
	Nickel in MT	588	943	(355)	(57)	(412)	355	531	531	-
47	MYANMAR CNMC NICKEL COMPANY LIMITED	588	943	(355)	(57)	(412)	355	531	531	-
	Barite in MT	257	-	257	257	-	257	514	-	514
43	Eden Energy & Natural Resources Development Co., Ltd	257	-	257	257	-	257	514	-	514

## 5.4. Payments of Oil and Gas Transportations Companies:

### 5.4.1. Cash flows reconciliation by company

The tables below show the differences between the payments reported by Oil and Gas Transportation companies and receipts reported by Government Agencies.

The tables include consolidated figures based on the reporting templates prepared by each company and Government Agency, adjustments made following our reconciliation work and the residual, unreconciled differences:

**Table 132: Transportation companies payments flows reconciliation**

*Amounts in MMK*

No.	Company	Templates originally lodged			Adjustments			Final amounts		
		Extractive company (a)	Gvt (b)	Difference (c) = (a - b)	Extractive company (d)	Gvt €	Difference (f) = (d-e)	Extractive company (g) = (a+d)	Government (h) = (b+e)	Difference (i) = (g-h)
1	(SEAGP)	32,055,178,406	43,670,606,695	(11,615,428,289)	10,912,464,177	(733,391,230)	11,645,855,407	42,967,642,583	42,937,215,465	30,427,118
2	(SEAOP)	12,353,502,594	9,422,254,505	2,931,248,089	(2,679,124,753)	(689,534,736)	(1,989,590,017)	9,674,377,841	8,732,719,769	941,658,072
3	(ATL)	423,308,857,588	61,961,096,023	361,347,761,565	(361,347,738,034)	-	(361,347,738,034)	61,961,119,554	61,961,096,023	23,531
4	(MGTC)	188,161,961,871	187,613,264,454	548,697,417	-	-	-	188,161,961,871	187,613,264,454	548,697,417
5	(TPC)	100,645,342,491	100,000,382,280	644,960,211	-	-	-	100,645,342,491	100,000,382,280	644,960,211
Total		756,524,842,950	402,667,603,957	353,857,238,993	(353,114,398,610)	(1,422,925,966)	(351,691,472,644)	403,410,444,340	401,244,677,991	2,165,766,349

## 5.4.2. Cash flows reconciliation by revenue stream

The table below shows total Payments reported by Oil and Gas Transportation companies and Government Agencies, taking into account all adjustments:

Table 133 : Transportation companies payments flows reconciliation

Amounts in MMK

N°	Description of Payment	Templates originally lodged			Adjustments			Final amounts		
		Extractive company	Govt	Difference	Extractive company	Govt	Difference	Extractive company	Govt	Difference
	<b>Payments in Cash</b>	<b>756,524,842,950</b>	<b>402,667,603,957</b>	<b>353,857,238,993</b>	<b>-353,114,398,610</b>	<b>-1,422,925,966</b>	<b>-351,691,472,644</b>	<b>403,410,444,340</b>	<b>401,244,677,991</b>	<b>2,165,766,349</b>
	Ministry of Planning and Finance (MoPF)	203,589,634,020	189,732,729,304	13,856,904,716	-13,129,983,782	-1,422,925,966	-11,707,057,816	190,459,650,238	188,309,803,338	2,149,846,900
	Customs Department	839,734,438	-	839,734,438	3,719,741,793	3,627,636,059	92,105,734	4,559,476,231	3,627,636,059	931,840,172
1	MCD Transit Fees 0.5 USD per MT	839,734,438	-	839,734,438	3,719,741,793	3,627,636,059	92,105,734	4,559,476,231	3,627,636,059	931,840,172
	Internal Revenue Department (IRD)	202,749,899,582	189,732,729,304	13,017,170,278	-16,849,725,575	-5,050,562,025	-11,799,163,550	185,900,174,007	184,682,167,279	1,218,006,728
2	Corporate Income Tax	185,875,824,907	184,682,167,279	1,193,657,628	-	-	-	185,875,824,907	184,682,167,279	1,193,657,628
3	Commercial Tax for MOGE contractors sales	5,081,007,145	5,050,562,025	30,445,120	-5,081,007,145	-5,050,562,025	-30,445,120	-	-	-
4	Stamp Duty	24,349,100	-	24,349,100	-	-	-	24,349,100	-	24,349,100
5	IRD Other significant payments (> USD 50,000)	11,768,718,430	-	11,768,718,430	-11,768,718,430	-	-11,768,718,430	-	-	-
	Department of Trade (DoT)	839,734,438	4,559,476,231	-3,719,741,793	3,719,741,793	-	3,719,741,793	4,559,476,231	4,559,476,231	-
6	DoT Transit Fees 0.5 USD per MT	839,734,438	4,559,476,231	-3,719,741,793	3,719,741,793	-	3,719,741,793	4,559,476,231	4,559,476,231	-
	State Owned Enterprises: MOGE	552,095,474,492	208,375,398,422	343,720,076,070	-343,704,156,621	-	-343,704,156,621	208,391,317,871	208,375,398,422	15,919,449
7	Profit distribution (dividend) to the MOGE interest	115,822,984,769	115,807,088,851	15,895,918	-	-	-	115,822,984,769	115,807,088,851	15,895,918
8	Right of Way/Land fees	73,907,863,158	13,879,429,323	60,028,433,835	-60,028,433,835	-	-60,028,433,835	13,879,429,323	13,879,429,323	-
9	MOGE Other significant payments (>50 KUSD)	362,364,626,565	78,688,880,248	283,675,746,317	-283,675,722,786	-	-283,675,722,786	78,688,903,779	78,688,880,248	23,531
	Social Payments	4,561,083,390	-	4,561,083,390	-	-	-	4,561,083,390	-	4,561,083,390
10	Voluntary Corporate Social Responsibility	4,561,083,390	-	4,561,083,390	-	-	-	4,561,083,390	-	4,561,083,390
	<b>Total payments</b>	<b>756,524,842,950</b>	<b>402,667,603,957</b>	<b>353,857,238,993</b>	<b>-353,114,398,610</b>	<b>-1,422,925,966</b>	<b>-351,691,472,644</b>	<b>403,410,444,340</b>	<b>401,244,677,991</b>	<b>2,165,766,349</b>

### 5.4.3. Adjustments to the reporting templates

#### Adjustments to the companies reporting templates

##### Adjustments per companies

The detail of the adjustments performed to the companies RT detailed per companies is presented below :

Table 134 : Transportation companies payments flows adjustments

							<i>Amounts in MMK</i>
No.	Company	Tax paid not reported	Tax paid reported but outside the period covered	Tax paid reported but outside the reconciliation scope	Tax amount incorrectly reported	Tax paid to other Government entity	Total Extractive company Adjustments
1	(SEAGP)	25,100,805,272	(6,489,531,923)	(6,960,997,011)	-	(737,812,161)	10,912,464,177
2	(SEAOP)	150,240,876	-	(4,807,721,419)	7,439,483,586	(5,461,127,796)	(2,679,124,753)
3	(ATL)	1,016,865,000	-	(362,364,603,034)	-	-	(361,347,738,034)
4	(MGTC)	-	-	-	-	-	-
5	(TPC)	-	-	-	-	-	-
Total		26,267,911,148	(6,489,531,923)	(374,133,321,464)	7,439,483,586	(6,198,939,957)	(353,114,398,610)

##### Adjustments per tax

The detail of the adjustments performed to the companies RT detailed per payment flows is presented below :

Table 134 : Transportation companies payments flows adjustments

							<i>Amounts in MMK</i>
No.	Revenue stream	Tax paid not reported	Tax paid reported but outside the period covered	Tax paid reported but outside the reconciliation scope	Tax amount incorrectly reported	Tax paid to other Government entity	Total Extractive company Adjustments
Payments in Cash		26,267,911,148	(6,489,531,923)	(374,133,321,464)	7,439,483,586	(6,198,939,957)	(353,114,398,610)
Ministry of Planning and Finance (MoPF)		-	-	(11,768,718,430)	3,719,741,793	(5,081,007,145)	(13,129,983,782)
Customs Department		-	-	-	3,719,741,793	-	3,719,741,793
1	MCD Transit Fees 0.5 USD per MT	-	-	-	3,719,741,793	-	3,719,741,793
Internal Revenue Department (IRD)		-	-	(11,768,718,430)	-	(5,081,007,145)	(16,849,725,575)
2	Commercial Tax for MOGE contractors' sales	-	-	-	-	(5,081,007,145)	(5,081,007,145)
3	IRD Other significant payments (> USD 50,000)	-	-	(11,768,718,430)	-	-	(11,768,718,430)

No.	Revenue stream	Tax paid not reported	Tax paid reported but outside the period covered	Tax paid reported but outside the reconciliation scope	Tax amount incorrectly reported	Tax paid to other Government entity	Total Extractive company Adjustments
	Department of Trade (DoT)	-	-	-	3,719,741,793	-	3,719,741,793
4	DoT Transit Fees 0.5 USD per MT	-	-	-	3,719,741,793	-	3,719,741,793
	State Owned Enterprises: MOGE	26,267,911,148	(6,489,531,923)	(362,364,603,034)	-	(1,117,932,812)	(343,704,156,621)
5	Right of Way/Land fees	1,016,865,000	-	-	-	(1,117,932,812)	(60,028,433,835)
6	MOGE Other significant payments (>50 KUSD)	25,251,046,148	(6,489,531,923)	(362,364,603,034)	-	-	(283,675,722,786)
	Total payments	26,267,911,148	(6,489,531,923)	(374,133,321,464)	7,439,483,586	(6,198,939,957)	(353,114,398,610)

### Adjustments to the government reporting templates

#### Adjustments per companies

The detail of the adjustments performed to the government agencies RT detailed per companies is presented below :

Table 135 : Government payments flows adjustments

*Amounts in MMK*

No.	Company	Tax received not reported	Tax supported by the MOGE on the behalf of companies	Tax received on other identification number	Total Government Adjustments
1	South East Asia Gas Pipeline Co.,Ltd(Great Ocean Branch)(SEAGP)	-	(733,391,230)	-	(733,391,230)
2	Southeast Asia Crude Oil Pipeline (SEAOP)	3,627,636,059	-	(4,317,170,795)	(689,534,736)
	Total	3,627,636,059	(733,391,230)	(4,317,170,795)	(1,422,925,966)

#### Adjustments per tax

The detail of the adjustments performed to the government agencies RT detailed per payment flows is presented below :



Table 135 : Government payments flows adjustments

					<i>Amounts in MMK</i>
No.	Revenue stream	Tax received not reported	Tax supported by the MOGE on the behalf of companies	Tax received on other identification number	Total Government Adjustments
	Payments in Cash	3,627,636,059	(733,391,230)	(4,317,170,795)	(1,422,925,966)
	Ministry of Planning and Finance (MoPF)	3,627,636,059	(733,391,230)	(4,317,170,795)	(1,422,925,966)
	Customs Department	3,627,636,059	-	-	3,627,636,059
1	MCD Transit Fees 0.5 USD per MT	3,627,636,059	-	-	3,627,636,059
	Internal Revenue Department (IRD)	-	(733,391,230)	(4,317,170,795)	(5,050,562,025)
2	Commercial Tax for MOGE contractors' sales	-	(733,391,230)	(4,317,170,795)	(5,050,562,025)
	Total payments	3,627,636,059	(733,391,230)	(4,317,170,795)	(1,422,925,966)

#### 5.4.4. Unreconciled discrepancies

Following our adjustments, the total unreconciled discrepancies amounted to MMK 2,165,766,349 representing (0.54%) of total payments reported by Government Bodies. These unreconciled differences are summarised in the table below:

*Amounts in MMK*

Reasons for differences	Unreconciled difference
Exchange rate difference (a)	1,209,553,546
Tax not reported by the Govt Body (b)	956,189,272
Not material difference	23,531
<b>Total Differences</b>	<b>2,165,766,349</b>

##### (b) Exchange rate difference:

Those differences resulted from the use of different exchange rate between the IRD and the exchange rate used in this report to convert the different payments performed by the companies in USD.

##### (c) Tax not reported by the Government Agency

This difference is related to taxes declared by companies as a payment to Government Agencies. However, the Government Agencies didn't report these payments in their reporting templates. The differences are detailed by company by tax as below:

*Amounts in MMK*

Company	SEAGP	SEAOP	Total
Transit fees collected by the MCD	931,840,172		931,840,172
Stamp Duty	14,531,200	9,817,900	24,349,100
<b>Total Differences</b>	<b>946,371,372</b>	<b>9,817,900</b>	<b>956,189,272</b>

## 5.5. Payments of Pearl Companies

### 5.5.1. Cash flows reconciliation by company

The tables below show the differences between the payments reported by Pearls companies and receipts reported by Government Agencies.

The tables include consolidated figures based on the reporting templates prepared by each company and Government Agency, adjustments made following our reconciliation work and the residual, unreconciled differences:

**Table 136 : Pearl companies payments flows reconciliation**

*Amounts in MMK*

No.	Company	Templates originally lodged			Adjustments			Final amounts		
		Extractive company (a)	Government (b)	Difference (c) =(a - b)	Extractive company (d)	Government €	Difference (f) = (d-e)	Extractive company (g) = (a+d)	Government (h) = (b+e)	Difference (i) = (g-h)
1	Myanmar Tasaki Co., Ltd	478,690,836	586,785,045	(108,094,209)	-	(110,336,333)	110,336,333	478,690,836	476,448,712	2,242,124
2	Myanmar Atlantic Co., Ltd	202,066,392	78,160,778	123,905,614	1,824,836	125,312,450	(123,487,614)	203,891,228	203,473,228	418,000
3	Myanmar Andman Co., Ltd	61,950,394	66,125,034	(4,174,640)	3,875,096	-	3,875,096	65,825,490	66,125,034	(299,544)
4	Belpearl Myanmar Co., Ltd	17,612,219	17,612,219	-	-	-	-	17,612,219	17,612,219	-
5	Nino Pearl Culturing Co., Ltd	271,579,667	271,579,667	-	-	-	-	271,579,667	271,579,667	-
6	Orient Pearl Co., Ltd (Zinyaw)	450,307,169	470,307,169	(20,000,000)	20,000,000	-	20,000,000	470,307,169	470,307,169	-
7	Orient Pearl Co., Ltd (Jalan)	170,244,000	170,244,000	-	-	-	-	170,244,000	170,244,000	-
8	Annawar Pearl Co., Ltd	85,088,713	84,445,906	642,807	-	-	-	85,088,713	84,445,906	642,807
9	Pyae Sone Htet Myint Co., Ltd	17,960,000	17,960,010	(10)	-	-	-	17,960,000	17,960,010	(10)
10	Aquagold Myanmar Co., Ltd	59,321,700	53,425,000	5,896,700	-	1,734,000	(1,734,000)	59,321,700	55,159,000	4,162,700
11	Pyae Phyto Tun Co., Ltd	20,000,000	20,000,000	-	-	-	-	20,000,000	20,000,000	-
<b>Total</b>		<b>1,834,821,090</b>	<b>1,836,644,828</b>	<b>(1,823,738)</b>	<b>25,699,932</b>	<b>16,710,117</b>	<b>8,989,815</b>	<b>1,860,521,022</b>	<b>1,853,354,945</b>	<b>7,166,077</b>

## 5.5.2. Cash flows reconciliation by revenue stream

The table below shows total Payments reported by Pearl companies and Government Agencies, taking into account all adjustments:

Table 136 : Pearl companies payments flows reconciliation

Amounts in MMK										
N°	Description of Payment	Templates originally lodged			Adjustments			Final amounts		
		Extractive company	Govt	Difference	Extractive company	Govt	Difference	Extractive company	Govt	Difference
	Payments in Kind	62,572	62,572	-	-	-	-	62,572	62,572	-
	State Owned Enterprises: MPE	62,572	62,572	-	-	-	-	62,572	62,572	-
1	Production Split 25% (Foreign companies only)	62,572	62,572	-	-	-	-	62,572	62,572	-
	Payments in Cash	1,834,821,090	1,836,644,828	(1,823,738)	25,699,932	16,710,117	8,989,815	1,860,521,022	1,853,354,945	7,166,077
	Ministry of Planning and Finance (MoPF)	1,087,664,090	1,089,614,818	(1,950,728)	25,699,932	16,710,117	8,989,815	1,113,364,022	1,106,324,935	7,039,087
	Customs Department	53,018,343	3,598,149	49,420,194	(9,400,075)	35,341,613	(44,741,688)	43,618,268	38,939,762	4,678,506
1	Customs duties (Normal and border imports)	19,080,667	2,874,795	16,205,872	-	11,527,366	(11,527,366)	19,080,667	14,402,161	4,678,506
2	Commercial Tax (Normal and border imports)	24,338,055	523,808	23,814,247	-	23,814,247	(23,814,247)	24,338,055	24,338,055	-
3	Advance income tax 2% collected by the MCD	9,599,621	199,546	9,400,075	(9,400,075)	-	(9,400,075)	199,546	199,546	-
	Internal Revenue Department (IRD)	1,034,645,747	1,086,016,669	(51,370,922)	35,100,007	(18,631,496)	53,731,503	1,069,745,754	1,067,385,173	2,360,581
6	Corporate Income Tax	1,025,042,952	1,076,949,619	(51,906,667)	33,275,171	(18,631,496)	51,906,667	1,058,318,123	1,058,318,123	-
7	Commercial Tax	6,942,670	9,067,050	(2,124,380)	1,824,836	-	1,824,836	8,767,506	9,067,050	(299,544)
8	Capital Gains Tax	-	-	-	-	-	-	-	-	-
9	Withholding Tax	1,858,125	-	1,858,125	-	-	-	1,858,125	-	1,858,125
10	Stamp Duties	802,000	-	802,000	-	-	-	802,000	-	802,000
	Ministry of Natural Resources and Environment Conservation (MONREC)	747,157,000	747,030,010	126,990	-	-	-	747,157,000	747,030,010	126,990
	Department of Mining (DOM)	702,000,000	702,000,010	(10)	-	-	-	702,000,000	702,000,010	(10)
13	Royalties (Seeding Tax - for local companies only)	702,000,000	702,000,010	(10)	-	-	-	702,000,000	702,000,010	(10)
	State Owned Enterprises: Myanmar Pearl Enterprise	45,157,000	45,030,000	127,000	-	-	-	45,157,000	45,030,000	127,000
14	License Fee (One-time fee)	-	-	-	-	-	-	-	-	-
15	Other Fees	1,357,000	1,230,000	127,000	-	-	-	1,357,000	1,230,000	127,000

N°	Description of Payment	Templates originally lodged			Adjustments			Final amounts		
		Extractive company	Govt	Difference	Extractive company	Govt	Difference	Extractive company	Govt	Difference
16	Lease of building	43,800,000	43,800,000	-	-	-	-	43,800,000	43,800,000	-
	<b>Social Payments</b>	<b>644,394,831</b>	<b>-</b>	<b>644,394,831</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>644,394,831</b>	<b>-</b>	<b>644,394,831</b>
17	Mandatory Corporate Social Responsibility	29,310,000	-	29,310,000	-	-	-	29,310,000	-	29,310,000
18	Voluntary Corporate Social Responsibility	611,642,081	-	611,642,081	-	-	-	611,642,081	-	611,642,081
19	Contribution to the State/region social development fund	3,442,750	-	3,442,750	-	-	-	3,442,750	-	3,442,750
	<b>Total payments</b>	<b>1,834,821,090</b>	<b>1,836,644,828</b>	<b>(1,823,738)</b>	<b>25,699,932</b>	<b>16,710,117</b>	<b>8,989,815</b>	<b>1,860,521,022</b>	<b>1,853,354,945</b>	<b>7,166,077</b>

### 5.5.3. Adjustments to the reporting templates

#### Adjustments to the companies reporting templates

##### Adjustments per companies

The detail of the adjustments performed to the companies RT detailed per companies is presented below :

*Amounts in MMK*

No.	Company	Tax paid not reported	Tax amount incorrectly reported	Total Extractive company Adjustments
1	Myanmar Tasaki Co., Ltd	-	-	-
2	Myanmar Atlantic Co., Ltd	-	1,824,836	<b>1,824,836</b>
3	Myanmar Andman Co., Ltd	3,875,096	-	<b>3,875,096</b>
4	Belpearl Myanmar Co., Ltd	-	-	-
5	Nino Pearl Culturing Co., Ltd	-	-	-
6	Orient Pearl Co., Ltd (Zinyaw)	20,000,000	-	<b>20,000,000</b>
7	Orient Pearl Co., Ltd (Jalan)	-	-	-
8	Annawar Pearl Co., Ltd (Marine Pearl Company)	-	-	-
9	Pyae Sone Htet Myint Co., Ltd	-	-	-
10	Aquagold Myanmar Co., Ltd	-	-	-
11	Pyae Phyoo Tun Co., Ltd	-	-	-
<b>Total</b>		<b>23,875,096</b>	<b>1,824,836</b>	<b>25,699,932</b>

### Adjustments per tax

The detail of the adjustments performed to the companies RT detailed per payment flows is presented below :

*Amounts in MMK*

No.	Revenue stream	Tax paid not reported	Tax amount incorrectly reported	Total Extractive company Adjustments
<b>Payments in Cash</b>		<b>23,875,096</b>	<b>1,824,836</b>	<b>25,699,932</b>
<b>Ministry of Planning and Finance (MoPF)</b>		<b>23,875,096</b>	<b>1,824,836</b>	<b>25,699,932</b>
<b>Customs Department</b>		-	-	<b>(9,400,075)</b>
3	Advance income tax 2% collected by the MCD	-	-	(9,400,075)
<b>Internal Revenue Department (IRD)</b>		<b>23,875,096</b>	<b>1,824,836</b>	<b>35,100,007</b>
6	Corporate Income Tax	23,875,096	-	33,275,171
7	Commercial Tax	-	1,824,836	1,824,836
<b>Total payments</b>		<b>23,875,096</b>	<b>1,824,836</b>	<b>25,699,932</b>

### Adjustments to the government reporting templates

#### Adjustments per companies

The detail of the adjustments performed to the government agencies RT detailed per companies is presented below :

*Amounts in MMK*

No.	Company	Tax received not reported	Tax received reported but outside the period covered	Total Government Adjustments
1	Myanmar Tasaki Co., Ltd	33,607,613	(143,943,946)	<b>(110,336,333)</b>
2	Myanmar Atlantic Co., Ltd	125,312,450	-	<b>125,312,450</b>
3	Aquagold Myanmar Co., Ltd	1,734,000	-	<b>1,734,000</b>
<b>Total</b>		<b>160,654,063</b>	<b>(143,943,946)</b>	<b>16,710,117</b>

## Adjustments per tax

The detail of the adjustments performed to the government agencies RT detailed per payment flows is presented below :

*Amounts in MMK*

No.	Revenue stream	Tax received not reported	Tax received reported but outside the period covered	Total Government Adjustments
<b>Payments in Cash</b>		<b>160,654,063</b>	<b>(143,943,946)</b>	<b>16,710,117</b>
<b>Ministry of Planning and Finance (MoPF)</b>		<b>160,654,063</b>	<b>(143,943,946)</b>	<b>16,710,117</b>
<b>Customs Department</b>		<b>35,341,613</b>	<b>-</b>	<b>35,341,613</b>
1	Customs duties (Normal and border imports)	11,527,366	-	11,527,366
2	Commercial Tax (Normal and border imports)	23,814,247	-	23,814,247
<b>Internal Revenue Department (IRD)</b>		<b>125,312,450</b>	<b>(143,943,946)</b>	<b>(18,631,496)</b>
3	Corporate Income Tax	125,312,450	(143,943,946)	(18,631,496)
<b>Total payments</b>		<b>160,654,063</b>	<b>(143,943,946)</b>	<b>16,710,117</b>



## 5.5.4. Unreconciled discrepancies

Following our adjustments made, the total unreconciled discrepancies amounted to MMK (15,131,328,016) representing (1.53%) of total payments reported by Government Bodies. These unreconciled differences are summarised below:

### Unreconciled discrepancies per company :

			<i>Amounts in MMK</i>		
No.	Company	Unreconciled difference	Tax not reported by the extractive company	Tax not reported by the Govt Body	Not material difference
1	Myanmar Tasaki Co., Ltd	2,242,124	-	2,242,125	(1)
2	Myanmar Atlantic Co., Ltd	418,000	-	418,000	-
3	Myanmar Andman Co., Ltd	(299,544)	(299,544)	-	-
4	Annawar Pearl Co., Ltd (Marine Pearl Company)	642,807	-	642,807	-
5	Pyae Sone Htet Myint Co., Ltd	(10)	-	-	(10)
6	Aquagold Myanmar Co., Ltd	4,162,700	-	4,162,700	-
<b>Total</b>		<b>7,166,077</b>	<b>(299,544)</b>	<b>7,465,632</b>	<b>(11)</b>

### Unreconciled discrepancies per company :

			<i>Amounts in MMK</i>		
No.	Revenue Stream	Unreconciled difference	Tax not reported by the extractive company	Tax not reported by the Govt Body	Not material difference < 5 Million Kyats
		<b>7,166,077</b>	<b>(299,544)</b>	<b>7,465,632</b>	
<b>Ministry of Planning and Finance (MoPF)</b>		<b>7,039,087</b>	<b>(299,544)</b>	<b>7,338,632</b>	<b>(1)</b>
<b>Customs Department</b>		<b>4,678,506</b>	-	<b>4,678,507</b>	<b>(1)</b>
1	Customs duties (Normal and border imports)	4,678,506	-	4,678,507	(1)
<b>Internal Revenue Department (IRD)</b>		<b>2,360,581</b>	<b>(299,544)</b>	<b>2,660,125</b>	-
7	Commercial Tax	(299,544)	(299,544)	-	-
9	Withholding Tax	1,858,125	-	1,858,125	-
10	Stamp Duties	802,000	-	802,000	-
<b>(MONREC)</b>		<b>126,990</b>	-	<b>127,000</b>	<b>(10)</b>
<b>Department of Mining (DOM)</b>		<b>(10)</b>	-	-	<b>(10)</b>

No.	Revenue Stream	Unreconciled difference
13	Royalties (Seeding Tax - for local companies only)	(10)
<b>State Owned Enterprises: Myanmar Pearl Enterprise</b>		<b>127,000</b>
14	License Fee (One-time fee)	-
15	Other Fees	127,000
<b>Total</b>		<b>7,166,077</b>

Tax not reported by the extractive company	Tax not reported by the Govt Body	Not material difference < 5 Million Kyats
-	-	(10)
-	<b>127,000</b>	-
-	-	-
-	127,000	-
<b>(299,544)</b>	<b>7,465,632</b>	<b>(11)</b>

## 5.6. SOE's Payments and transfers

Following MSG's decision, we reconciled the payments and transfers made by SOE to the Government Agencies. The results of this reconciliation is detailed below:

### 5.6.1. MOGE's Payments and transfers reconciliation

Table 137 : MOGE payments flows reconciliation

Figures in MMK

	Per SOE			Per Government			Final difference
	Original	Adjust	Final	Original	Adjust	Final	
Ministry of Planning and Finance (MoPF)	615,997,076,502	(16,810,087,924)	599,186,988,578	600,048,103,677	-	600,048,103,677	(861,115,099)
Internal Revenue Department (IRD)	589,455,368,286	-	589,455,368,286	590,082,256,934	-	590,082,256,934	(626,888,648)
Corporate Income Tax	143,540,007,000		143,540,007,000	143,540,083,600		143,540,083,600	(76,600)
Commercial Tax for MOGE contractors' sales	152,589,852,237		152,589,852,237	153,655,609,396		153,655,609,396	(1,065,757,159)
Specific Goods Tax	293,325,509,049		293,325,509,049	292,886,563,938		292,886,563,938	438,945,111
Myanmar Customs Department (MCD)	26,541,708,216	(16,810,087,924)	9,731,620,292	9,965,846,743	-	9,965,846,743	(234,226,451)
Customs duties (Normal and border imports)	9,743,484,064	(11,863,772)	9,731,620,292	9,965,846,743		9,965,846,743	(234,226,451)
Commercial Tax (Normal and border imports)	16,798,224,152	(16,798,224,152)	-			-	-
Social Payments	3,408,047,844		3,408,047,844			-	3,408,047,844
Mandatory Corporate Social Responsibility	3,408,047,844		3,408,047,844			-	3,408,047,844
Transfers	1,151,557,237,205	-	1,151,557,237,205	1,151,557,236,723	-	1,151,557,236,723	482
Transfers to OGD	352,874,435,723		352,874,435,723	352,874,435,723		352,874,435,723	-
Transfers to Treasury department (State contribution 20%)	114,832,006,000		114,832,006,000	114,832,006,000		114,832,006,000	-
Transfer to UFA other accounts	683,850,795,482		683,850,795,482	683,850,795,000		683,850,795,000	482
Opening balance UFA OA	5,598,952,285,930		5,598,952,285,930	5,598,952,286,000		5,598,952,286,000	(70)
Closing balance UFA OA	6,282,803,081,000		6,282,803,081,000	6,282,803,081,000		6,282,803,081,000	-

## 5.6.2. MGE's Payments and transfers reconciliation

Table 138 : MGE payments flows reconciliation

	Per SOE			Per Government			Amounts in MMK
	Original	Adjust	Final	Original	Adjust	Final	Final difference
Ministry of Planning and Finance (MoPF)	55,855,353,428	-	55,855,353,428	55,855,914,632	-	55,855,914,632	(561,204)
Internal Revenue Department (IRD)	55,855,353,428	-	55,855,353,428	55,855,914,632	-	55,855,914,632	(561,204)
Corporate Income Tax	55,674,026,000		55,674,026,000	55,674,026,000		55,674,026,000	-
Commercial Tax	3,000,000		3,000,000	3,000,000		3,000,000	-
Specific Goods Tax	178,327,428		178,327,428	178,888,632		178,888,632	(561,204)
<b>Transfers</b>	<b>116,898,963,013</b>	<b>-</b>	<b>116,898,963,013</b>				
Transfers to Treasury department (State contribution 20%)	44,539,221,000		44,539,221,000	44,539,221,000		44,539,221,000	-
Transfer to UFA other accounts	72,359,742,013		72,359,742,013	72,359,742,000		72,359,742,000	13
Opening balance UFA OA	687,513,958,350		687,513,958,350	687,513,958,000		687,513,958,000	350
Closing balance UFA OA	759,873,700,363		759,873,700,363	759,873,700,000		759,873,700,000	363

### 5.6.3. ME 1's Payments and transfers reconciliation

Table 139 : ME1 payments flows reconciliation

	Per SOE			Per Government			Final difference
	Original	Adjust	Final	Original	Adjust	Final	
Ministry of Planning and Finance (MoPF)	7,538,061,000						
Internal Revenue Department (IRD)	7,538,061,000	-	7,538,061,000	7,572,960,781	-	7,572,960,781	(34,899,781)
Corporate Income Tax	7,538,061,000		7,538,061,000	7,538,192,050		7,538,192,050	(131,050)
Commercial Tax			-	34,768,731		34,768,731	(34,768,731)
<b>Transfers</b>	<b>137,140,054,259</b>	<b>-</b>	<b>137,140,054,259</b>	<b>136,663,567,000</b>	<b>-</b>	<b>136,663,567,000</b>	<b>476,487,259</b>
Transfers to Treasury department (State contribution 20%)	6,030,447,000		6,030,447,000	6,030,447,000		6,030,447,000	-
Transfer to UFA other accounts	2,694,766,069		2,694,766,069	2,704,022,000		2,704,022,000	(9,255,931)
Opening balance UFA OA	62,860,037,560		62,860,037,560	62,612,538,000		62,612,538,000	247,499,560
Closing balance UFA OA	65,554,803,630		65,554,803,630	65,316,560,000		65,316,560,000	238,243,630
<b>Social payments</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
Mandatory Social Payments			-			-	-
Voluntary Social Payments			-			-	-
Contribution to the State/region social development fund			-			-	-
Other significant payments (> USD 50,000)			-			-	-

Amounts in MMK

## 5.6.4. ME 2's Payments and transfers reconciliation

Table 140 : ME2 payments flows reconciliation

	Per SOE			Per Government			Final difference
	Original	Adjust	Final	Original	Adjust	Final	
Ministry of Planning and Finance (MoPF)	1,613,069,526						
Internal Revenue Department (IRD)	1,613,069,526	-	1,613,069,526	1,611,267,427	-	1,611,267,427	1,802,099
Corporate Income Tax	1,544,892,000		1,544,892,000	1,544,916,000		1,544,916,000	(24,000)
Commercial Tax	65,161,536		65,161,536	63,335,437		63,335,437	1,826,099
Capital Gains Tax	3,015,990		3,015,990	3,015,990		3,015,990	-
Transfers	228,244,293,721	-	228,244,293,721	228,244,293,722	-	228,244,293,722	- 1
Transfers to Treasury department (State contribution 20%)	4,222,813,000		4,222,813,000	4,222,813,000		4,222,813,000	-
Transfer to UFA other accounts	8,233,319,614		8,233,319,614	8,233,319,000		8,233,319,000	614
Opening balance UFA OA	103,777,420,746		103,777,420,746	103,777,421,361		103,777,421,361	(615)
Closing balance UFA OA	112,010,740,361		112,010,740,361	112,010,740,361		112,010,740,361	-
Social payments	-	-	-	-	-	-	-
Mandatory Social Payments			-			-	-
Voluntary Social Payments			-			-	-
Contribution to the State/region social development fund			-			-	-
Other significant payments (> USD 50,000)			-			-	-

Amounts in MMK

## 5.6.5. MPE's Payments and transfers reconciliation

Table 141 : MPE payments flows reconciliation

	Per SOE			Per Government			Amounts in MMK
	Original	Adjust	Final	Original	Adjust	Final	Final difference
<b>Ministry of Planning and Finance (MoPF)</b>	3,051,528,865	-	3,051,528,865	3,051,528,865	-	3,051,528,865	-
<b>Internal Revenue Department (IRD)</b>	3,051,528,865	-	3,051,528,865	3,051,528,865	-	3,051,528,865	-
Corporate Income Tax	2,891,393,000		2,891,393,000	2,891,393,000		2,891,393,000	-
Commercial Tax	160,135,865		160,135,865	160,135,865		160,135,865	-
<b>Social Payments</b>	-	-	-	-	-	-	-
Mandatory Social Payments			-			-	-
Voluntary Social Payments			-			-	-
Contribution to the State/region social development fund			-			-	-
Other significant payments (> USD 50,000)			-			-	-
<b>Transfers</b>							
Transfers to Treasury department (State contribution 20%)	2,313,115,000		2,313,115,000	2,313,115,000		2,313,115,000	-
Transfer to UFA other accounts	7,538,998,519		7,538,998,519	7,537,799,000		7,537,799,000	1,199,519
Opening balance UFA OA	37,133,942,238		37,133,942,238	37,133,942,000		37,133,942,000	238
Closing balance UFA OA	44,672,940,758		44,672,940,758	44,671,741,000		44,671,741,000	1,199,758

## 5.7. Production and Exportation

### 5.7.1. Oil and Gas

#### (a) Oil and Gas Production

The table below shows the differences between the production reported by Oil and Gas companies and MOGE.

#### Oil and condensate production reconciliation:

Table 142 : Oil and condensate production reconciliation

Company name	Company		SOE		Difference	
	Quantity produced in bbl	Value in USD	Quantity produced in bbl	Value in USD	Quantity produced in bbl	Value in USD
GOLDPETROL JOC. Inc.	829,549	45,488,963	829,549	45,488,963	-	-
MPRL&ELP Pte Ltd. (Yangon Branch)	487,490	25,864,308	487,490	25,864,308	-	-
PC Myanmar (Hongkong) Limited	1,603,783	Nc	1,603,783	nc	-	nc
Total	2,920,822	71,353,270	2,920,822	71,353,270	-	-

#### Gas production reconciliation :

Table 143 : Gas production reconciliation

Company name	Company		SOE		Difference	
	Quantity produced in Mscf	Value in USD	Quantity produced in Mscf	Value in USD	Quantity produced in Mscf	Value in USD
GOLDPETROL JOC. Inc.					-	-
MPRL&ELP Pte Ltd. (Yangon Branch)	707	1,168,429	707	1,168,429	-	-
PC Myanmar (Hongkong) Limited	81,407		81,407		-	-
Posco Daewoo Corporation (Myanmar E&P Office)	172,023		172,023		-	-
PTTEP International Ltd.	110,748	703,921,306	114,492	nc	(3,744)	na
Total E&P Myanmar	281,782	1,422,861,113	281,782	nc	-	na
Total	646,667	2,127,950,849	650,411	1,168,429	(3,744)	-



**(b) Oil and Gas sales**

The table below shows the differences between the sales reported by Oil and Gas companies and MOGE.

**Oil sales reconciliation :**

**Table 144 : Oil sales reconciliation**

Company name	Type of sales	Company		SOE		Difference	
		Quantity sold in bbl	Value in USD	Quantity sold in bbl	Value in USD	Quantity sold in bbl	Value in USD
GOLDPETROL JOC. Inc.	Domestic sales	5,900	323,845	5,900	323,845	-	-
PC Myanmar (Hongkong) Limited	Exports	1,824,806	106,739,343	1,824,806	106,739,343	-	-
<b>Total</b>		<b>1,830,706</b>	<b>107,063,188</b>	<b>1,830,706</b>	<b>107,063,188</b>	<b>-</b>	

**Gas exports reconciliation :**

**Table 145 : Gas exports reconciliation**

Company name	Type of sales	Company		SOE		Difference	
		Quantity sold in Mscf	Value in USD	Quantity sold in MMsf	Value in USD	Quantity exported	Value
PC Myanmar (Hongkong) Limited	Export	74,447	482,749,621	74,447	482,749,621	-	-
Posco Daewoo Corporation (Myanmar E&P Office)	Export	139,940	916,255,910	139,940	916,255,910	-	-
PTTEP International Ltd.	Export	87,177	572,965,671	87,177	572,965,671	-	-
<b>Total E&amp;P Myanmar</b>	<b>Export</b>	<b>210,926</b>	<b>1,026,494,470</b>	<b>201,750</b>	<b>1,026,494,470</b>	<b>9,176</b>	<b>-</b>
<b>Total</b>		<b>512,489</b>	<b>2,998,465,672</b>	<b>503,313</b>	<b>2,998,465,672</b>	<b>9,176</b>	<b>-</b>

Gas domestic sales reconciliation :

Table 146 : Gas domestic sales reconciliation

Company name	Type of sales	Company		SOE		Difference	
		Quantity sold in MMsf	Value in USD	Quantity sold in MMsf	Value in USD	Quantity exported	Value
Posco Daewoo Corporation (Myanmar E&P Office)	Domestic sales	26,159	170,432,298	26,159	170,432,298	-	-
PTTEP International Ltd.	Domestic sales	23,571	130,955,635	23,571	130,955,635	-	-
Total E&P Myanmar	Domestic sales	64,888	204,736,866	64,889	204,736,866	-	-
Total		114,618	506,124,798	114,619	506,124,798	-	-

## 5.7.2. Gems and Jade

### (a) Gems and Jade Production

The table below shows the differences between the jade production reported by companies and MGE.

**Table 147 : Gems and Jade production reconciliation**

*Amounts in MMK*

N°	Company	Company			MGE			Differences	
		Volume (Kg)	Value	Currency	Volume (Kg)	Value	Currency	Volume	Value
1	Linn Lett Win Yadanar Gems Co Ltd	737,885	2,496,093,300	MMK	737,888	2,496,102,300	MMK	(3)	(9,000)
2	Yar Za Htar Ni	101,754	329,467,400	MMK	101,754	331,492,400	MMK	-	(2,025,000)
3	YADANAR TAUNG TEN	-	-	MMK		5,461,340,000	MMK	-	(5,461,340,000)
4	Wai Aung Gabar	165,392	533,339,700	MMK	165,392	533,339,700	MMK	-	-
5	Ayeyar Yadanar Gems & Jewellery Co.,Ltd	1,759,063	5,823,519,800	MMK	2,121,643	7,091,822,050	MMK	(362,580)	(1,268,302,250)
6	A K N K				63,016	219,786,700	MMK	(63,016)	(219,786,700)
7	SILVER ELEPHANT GEMS CO LTD (Ngwe Sin (NS-S))	1,505,851	1,088,517,080	MMK	1,498,471	5,447,445,400	MMK	7,380	(4,358,928,320)
8	Phyo Thiha Kyaw	119,261	428,977,200	MMK	119,261	428,977,200	MMK	-	-
10	Mya Garden (GEG)	1,169,416	3,793,273,100	MMK	1,169,416	3,793,273,100	MMK	-	-
11	Kan Pwint Oo	57,829	234,794,050	MMK	57,829	234,794,050	MMK	-	-
12	Shwe Ngar Koe Kaung	1,206	4,012,950	MMK	1,206	4,012,950	MMK	-	-
14	Htun Tauk Zabu Gems & Jewellery Co;Ltd.	-	-	MMK	597,872	2,181,334,300	MMK	(597,872)	(2,181,334,300)
15	Sein Lon Taung Tan (SLTT-S)	120,208	560,314,700	MMK	120,208	560,314,700	MMK	-	-
16	Ayar Jade	-	-	MMK	114,870	378,369,500	MMK	(114,870)	(378,369,500)
17	Shining Star Light Gems & Jewellery Co.,Ltd	1,202,870	3,917,385,400	MMK	1,202,870	3,917,385,400	MMK	-	-
18	Yadanar Sin Thiri Gems Co	77,576	51,582,440	MMK	82,572	274,297,000	MMK	(4,996)	(222,714,560)
20	Jade Mountain	30,626	99,380,000	MMK	30,626	99,380,000	MMK	-	-
21	Thirawmani	168,131	540,845,000	MMK	168,131	540,845,000	MMK	-	-
22	Phoe Thar Htoo	69,225	223,333,900	MMK	69,225	223,333,900	MMK	-	-
23	Myanma Seinn Lei Aung Gems Co Ltd.	103,599	350,820,300	MMK	146,407	495,354,150	MMK	(42,808)	(144,533,850)
24	Yadanar Young Chi	-	-	MMK	355,254	1,695,444,300	MMK	(355,254)	(1,695,444,300)

N°	Company	Company			MGE			Differences	
		Volume (Kg)	Value	Currency	Volume (Kg)	Value	Currency	Volume	Value
25	Lin Htet Aung	67,644	246,992,550	MMK	143,102	521,220,950	MMK	(75,458)	(274,228,400)
26	Norbal Three Star (GMMK)	40,430	302,621,500	MMK	40,430	302,621,500	MMK	-	-
27	WAN BROTHERS	-	-	MMK	268,363	908,986,350	MMK	(268,363)	(908,986,350)
28	Mya Yaung Tun	2,864	144,635,000	MMK	14,764	188,691,500	MMK	(11,900)	(44,056,500)
30	Khun Paooe	65,822	347,997,558	MMK	208,980	674,851,600	MMK	(143,158)	(326,854,042)
31	Great wall Gems&Jade company (Shwe Tataing)	28,680	110,491,700	MMK	28,680	110,491,700	MMK	-	-
32	Great Genesis Gems (GMH)	1,076,001	715,133,270	MMK	1,076,001	3,575,666,350	MMK	-	(2,860,533,080)
34	Wai Family	88,583	324,450,300	MMK	88,583	324,450,300	MMK	-	-
35	Sai Taung Co	40	544,037,042	MMK	206,747	713,111,100	MMK	(206,707)	(169,074,058)
35	Sai Taung Co	44	6,464,850	Euro	-	-	MMK	44	6,464,850
36	Kyauk Same Nan Taw (GKN)				225,074	770,120,500	MMK	(225,074)	(770,120,500)
39	1 1 1	250,913	1,184,755,500	MMK	250,913	1,184,755,500	MMK	-	-
40	Kaung Myat Thu Ka	1,082,188	3,844,950,850	MMK	1,081,723	3,852,180,850	MMK	465	(7,230,000)
42	Khine Myanmar	38,509	25,689,040	MMK	38,509	128,445,200	MMK	-	(102,756,160)
43	Unity	3,348	9,389,300	MMK	3,264	46,946,500	MMK	84	(37,557,200)
44	Wai Yan Thar (WYT)	14,699	56,862,700	MMK	14,699	56,862,700	MMK	-	-
45	Sin Gaung Taung	-	-	MMK	2,026	6,816,300	MMK	(2,026)	(6,816,300)
46	GREEN MOUNTAIN CO;LTD	239,315	165,014,220	MMK	239,163	825,070,800	MMK	152	(660,056,580)
48	Kyaut Myat Min	19,895	68,406,400	MMK	19,895	68,406,400	MMK	-	-
49	Yadanar Shwe Ye Win	10,736	111,017,100	MMK	10,736	111,017,100	MMK	-	-
50	Myit Sone Ayar	529,599	1,743,036,300	MMK	529,629	1,744,416,300	MMK	(30)	(1,380,000)
51	Yadanar Aung Chan	-	-	MMK	6,730	21,224,400	MMK	(6,730)	(21,224,400)
52	Myanmar Imperial Jade Co	77,076	677,664,800	MMK	77,076	677,664,800	MMK	-	-
53	Khin Zaw Aung & Brother	-	-	MMK	439,456	1,466,980,800	MMK	(439,456)	(1,466,980,800)
54	Myanmar First Gems & Jewellery Co Ltd	606,255	1,958,443,100	MMK	606,255	1,958,443,100	MMK	-	-
55	Ever Winner [EW]	12,365	59,847,000	MMK	12,365	59,847,000	MMK	-	-
56	Shwe Hein Htet Gems Co Ltd	47,851	155,997,450	MMK	47,851	155,997,450	MMK	-	-
57	Myo Nwe Gems	182,446	136,347,840	MMK	182,446	681,739,200	MMK	-	(545,391,360)

N°	Company	Company			MGE			Differences	
		Volume (Kg)	Value	Currency	Volume (Kg)	Value	Currency	Volume	Value
58	Tun Naing Aung	-	-	MMK	29,778	110,005,000	MMK	(29,778)	(110,005,000)
59	Nay Min Kabar Co	183,273	697,369,100	MMK	183,273	697,369,100	MMK	-	-
60	Zebu Thiri Gems Co.,Ltd	53,094	165,649,400	MMK	53,772	167,683,400	MMK	(678)	(2,034,000)
61	Yadanar Three Elephants Co	209,478	137,937,980	MMK	209,478	689,689,900	MMK	-	(551,751,920)
62	Kyaing International (GKI)				12,976	41,791,000	MMK	(12,976)	(41,791,000)
63	Nan Oo Yadanar	19,901	67,177,050	MMK	19,901	67,177,050	MMK	-	-
64	Su Htu Pan (Su Htoo Pan)	-	-	MMK	3,099	10,516,900	MMK	(3,099)	(10,516,900)
65	Long Byit	93,305	311,670,550	MMK	109,874	366,540,450	MMK	(16,569)	(54,869,900)
67	Win Lei Yadanar	7,333	24,612,600	MMK	90,579	342,856,850	MMK	(83,246)	(318,244,250)
69	Treasure Star Co., Ltd. (Yadanar kyal)	149,345	528,866,400	MMK	304,070	1,058,635,050	MMK	(154,725)	(529,768,650)
70	ARS Gems [ARS]	12,566	8,242,460	MMK	12,566	41,212,300	MMK	-	(32,969,840)
71	Yadanar Pyae Phyo Aung	-	-	MMK	259	1,297,500	MMK	(259)	(1,297,500)
72	Jade Padatar Gems Co,Ltd	177,222	586,681,050	MMK	384,073	1,270,025,850	MMK	(206,851)	(683,344,800)
73	Ruby Dragon Company	2,611	8,995,700	MMK	2,611	8,995,700	MMK	-	-
75	Kaung Htet Khaing	30,896	102,190,800	MMK	30,896	102,190,800	MMK	-	-
76	Kaung Swan Htet Co	38,570	32,716,800	MMK	38,570	163,584,000	MMK	-	(130,867,200)
78	Same Lei Yadanar Win Co (SLYW)	-	-	MMK	88,715	290,892,900	MMK	(88,715)	(290,892,900)
80	Agga Yadanar	76,564	256,744,900	MMK	279,554	948,890,100	MMK	(202,990)	(692,145,200)
81	Shwe War Myae (mandalay)	15,173	66,156,500	MMK	15,173	66,156,400	MMK	-	100
84	Aung Hein Minn	-	-	MMK	175,857	588,016,600	MMK	(175,857)	(588,016,600)
85	Kyauk Seinn Sun Shwin Jade Gems & Jewellery Co Ltd	-	-	MMK	9,769	36,653,150	MMK	(9,769)	(36,653,150)
87	U YA GEMS	81,886	263,472,100	MMK	83,252	268,099,800	MMK	(1,366)	(4,627,700)
88	Chaung Brother	-	-	MMK	103,247	355,332,300	MMK	(103,247)	(355,332,300)
89	Myat Yamon	45,002	30,353,420	MMK	45,002	151,767,100	MMK	-	(121,413,680)
90	Nay La Pwint	92,397	374,861,700	MMK	92,397	374,861,700	MMK	-	-
91	Ma Li Kha Gem Stone Co	-	-	MMK	580,189	1,872,779,140	MMK	(580,189)	(1,872,779,140)
93	Aung Tu Ka Dana	-	-	MMK	6,387	19,602,000	MMK	(6,387)	(19,602,000)
96	Thein Gabar Aung	2,805	2,641,640	MMK	3,960	13,208,200	MMK	(1,155)	(10,566,560)

N°	Company	Company			MGE			Differences	
		Volume (Kg)	Value	Currency	Volume (Kg)	Value	Currency	Volume	Value
97	Jade Treasure	6,201	3,920,200	MMK	6,201	19,601,000	MMK	-	(15,680,800)
98	Lawka Nandar	351,822	1,114,818,700	MMK	351,822	1,114,818,700	MMK	-	-
101	Lon Hai	-	-	MMK	12,497	41,567,700	MMK	(12,497)	(41,567,700)
102	Shwe Yaung Sin	91,835	343,058,400	MMK	92,270	344,363,400	MMK	(435)	(1,305,000)
103	Hein Aung Lin Htet Jade Co. Ltd	54,927	176,283,800	MMK	91,520	323,144,400		(36,593)	(146,860,600)
104	Phar Kant Sai Bon				22	9,318,000	MMK	(22)	(9,318,000)
105	Thigi Myintzu Yadanar	9,542	5,945,640	MMK	9,542	29,728,200	MMK	-	(23,782,560)
106	Same Nay Chi (SNC)	231,064	796,234,700	MMK	231,064	796,234,700	MMK	-	-
107	Seine Light				33,287	164,585,300	MMK	(33,287)	(164,585,300)
108	New Lucky Green Gems	18,141	74,307,300	MMK	18,141	74,307,300	MMK	-	-
110	Jade Thazin	148,364	438,591,050	MMK	177,297	579,984,750	MMK	(28,933)	(141,393,700)
111	Kaung Su Aung	-	-	MMK	41,782	169,935,500	MMK	(41,782)	(169,935,500)
112	Kachin National Development	100	286,808,543	MMK	5,817	20,692,200	MMK	(5,717)	266,116,343
114	Kaung Wai Yan Co				138,525	481,642,200	MMK	(138,525)	(481,642,200)
116	Lucky Star Jade Group	25,068	93,738,200	MMK	25,068	93,738,200	MMK	-	-
117	Yadanar Si	-	-	MMK	20,402	72,580,800	MMK	(20,402)	(72,580,800)
118	Ah Mhan Akhan Kyauk Seinn	114,351	377,440,300	MMK	114,351	377,440,300	MMK	-	-
119	Jewel Crown Company (Yadanar Thayaphu)	132,956	143,812,820	MMK	132,956	719,064,100	MMK	-	(575,251,280)
120	Kaung Mon Yadanar	84,842	256,543,450	MMK	84,842	256,543,450	MMK	-	-
125	Seine Aung				221,084	731,845,250	MMK	(221,084)	(731,845,250)
126	Myint Shinn	2,665	13,221,000	MMK	-	-	MMK	2,665	13,221,000
128	Buu Gar				75	1,244,100	MMK	(75)	(1,244,100)
129	Jade Shae Saung	-	-	MMK	3,979	13,257,500	MMK	(3,979)	(13,257,500)
130	Jade Min (Kyauk Seinn Minn Gems)	4,985	19,745,600	MMK	77,368	275,418,100	MMK	(72,383)	(255,672,500)
133	MELODIOUS GEMS COMPANY LIMITED (Tharyar Kyinu Phwe)	36,962	123,219,900	MMK	36,962	123,219,900	MMK	-	-
137	Nay Chi Yadanar	-	-	MMK	78,369	259,078,500	MMK	(78,369)	(259,078,500)
138	Kyauk Sein Win Kabar	-	-	MMK	10,077	53,564,800	MMK	(10,077)	(53,564,800)
140	Kaung Htike	-	-	MMK	10,721	34,053,900	MMK	(10,721)	(34,053,900)

N°	Company	Company			MGE			Differences	
		Volume (Kg)	Value	Currency	Volume (Kg)	Value	Currency	Volume	Value
142	Treasure Five Star Co., Ltd (Yadanar Kyal Ngar Pwint)	-	-	MMK	1,469	5,122,600	MMK	(1,469)	(5,122,600)
144	Ngwe Young Stone	-	10,641,980	MMK	10,036	53,209,900	MMK	(10,036)	(42,567,920)
147	Pon Taung Thar	308,766	203,856,330	MMK	361,548	1,188,634,800	MMK	(52,782)	(984,778,470)
150	Treasure White Lotus (Yadanar Kyar Phyu)	672	2,171,100	MMK	672	2,171,100	MMK	-	-
151	Sein Thura San	-	-	MMK	20,320	71,326,475	MMK	(20,320)	(71,326,475)
153	San Taw Win				8,680	33,125,550	MMK	(8,680)	(33,125,550)
154	Jade Crystal Palace	8,555	33,834,600	MMK	8,555	33,834,600	MMK	-	-
157	Gold Jade	254,248	2,056,748,900	MMK	254,248	2,056,748,900	MMK	-	-
158	Thet Hein	-	-	MMK	48,142	162,325,100	MMK	(48,142)	(162,325,100)
159	Myanmar Kywal Wa Thaw Myay (Myanmar Rich Land Gems)	55,715	197,227,800	MMK	56,395	199,883,400	MMK	(680)	(2,655,600)
160	MEGA STAR JEWEL LIMITED	14,181	45,909,000	MMK	17,293	55,740,000	MMK	(3,112)	(9,831,000)
161	Kan Sein Pwint				2,941	9,879,000	MMK	(2,941)	(9,879,000)
162	Myanmar Winning Gate (GMWG)				737,142	2,455,296,500	MMK	(737,142)	(2,455,296,500)
163	San Family	38,597	182,667,800	MMK	60,929	256,868,700	MMK	(22,332)	(74,200,900)
164	Hone Yin Yi Shin	11,102	35,990,100	MMK	11,102	35,990,100	MMK	-	-
165	Green Comet gems& Jade company (Kyal Ta Khon Sein)	11,906	44,500,300	MMK	11,906	44,500,300	MMK	-	-
166	Gandawin Kyaut Myat Garden	-	-	MMK	2,500	7,905,000	MMK	(2,500)	(7,905,000)
170	Than Lwin Kyaw Kyar	17,588	60,744,250	MMK	17,588	60,744,250	MMK	-	-
171	Gems Shwe Pyi Co	-	-	MMK	90,152	1,479,581,200	MMK	(90,152)	(1,479,581,200)
173	Innwa Nay Chi Co	12,533	7,997,300	MMK	12,533	39,986,500	MMK	-	(31,989,200)
174	Jade Master	14,524	57,724,450	MMK	14,524	57,724,450	MMK	-	-
176	Shwe Tun Win	27,651	97,845,150	MMK	27,651	97,845,150	MMK	-	-
178	Jade Brothers	-	-	MMK	57,185	200,503,400	MMK	(57,185)	(200,503,400)
181	Shwe Pyi Thar Thama	1,117	4,008,300	MMK	1,117	4,008,300	MMK	-	-
184	Lyan Shan	13,637	47,227,800	MMK	13,637	47,227,800	MMK	-	-
185	Yadanar Myat Noe Thwe Gem	30,432	77,405,560	MMK	30,432	387,027,800	MMK	-	(309,622,240)
186	Kyi Wai Yan	9,002	29,053,100	MMK	9,002	29,053,100	MMK	-	-
187	Yadanar San Shwin Gem	145,799	492,911,600	MMK	140,414	475,397,600	MMK	5,385	17,514,000

N°	Company	Company			MGE			Differences	
		Volume (Kg)	Value	Currency	Volume (Kg)	Value	Currency	Volume	Value
204	KYAW NAING & BROTHERS	42,056	134,390,000	MMK	42,056	134,390,000	MMK	-	-
205	LAW LU	-	-	MMK	83,539	278,315,800	MMK	(83,539)	(278,315,800)
206	MYANMAR SITHU	5,715	22,740,600	MMK	5,715	22,740,600	MMK	-	-
Total Jade production (MMK)		15,504,193	45,189,062,613	MMK	21,942,112	84,839,380,815	MMK	(6,437,919)	(39,650,318,202)
Total Jade production (EUR)		44	6,464,850	Euro				44	6,464,850

#### Actual MGE, Gems Production

N°	Company	Company			MGE			Differences		
		Volume in carat	Volume in kilo	Value in MMK	Volume in carat	Volume in kilo	Value in MMK	Volume in carat	Volume in kilo	Value in MMK
30	Khun Paoee	-	-	-	60,800	-	6,488,000	(60,800)	-	(6,488,000)
34	Wai Family	500	-	60,000	500	-	60,000	-	-	-
65	Long Byit	-	-	-	37,800	-	6,085,000	(37,800)	-	(6,085,000)
73	Ruby Dragon Company	14,200	-	3,750,000	14,200	-	3,750,000	-	-	-
84	Aung Hein Minn	-	168,744	565,036,600	-	-	-	-	168,744	565,036,600
85	Kyauk Seinn Sun Shwin Jade Gems & Jewellery Co Ltd	-	-	-	28,800	-	3,686,000	(28,800)	-	(3,686,000)
90	Nay La Pwint	8,000	-	1,298,000	8,000	-	1,298,000	-	-	-
114	Kaung Wai Yan Co	-	5,835	19,323,000	-	-	-	-	5,835	19,323,000
123	Aung Hlaing Kyawtwa	-	-	-	2,000	-	500,000	(2,000)	-	(500,000)
183	Nilar Yoma	78,100	-	14,906,000	78,100	-	14,906,000	-	-	-
189	MOGOK PRIDE	15,500	-	900,000	15,500	-	4,500,000	-	-	(3,600,000)
190	Excellent Ruby & Sapphire(Sharing)	-	-	-	10,900	-	6,250,000	(10,900)	-	(6,250,000)
190	Excellent Ruby & Sapphire(Private)	-	-	-	14,500	-	1,000,000	(14,500)	-	(1,000,000)
191	CHIT KYI YAE	-	-	-	2,900	-	2,000,000	(2,900)	-	(2,000,000)
192	SHWE NAING TUN	-	-	-	-	27	350,000	-	(27)	(350,000)
193	R.B.G	4,690	-	3,250,000	4,690	-	3,250,000	-	-	-
194	KHINE THIT SAR	11,217	-	19,750,000	12,306	-	19,750,000	(1,089)	-	-
195	MYANMAR LABA	17,955	-	7,950,000	17,955	-	7,950,000	-	-	-



N°	Company	Company			MGE			Differences		
		Volume in carat	Volume in kilo	Value in MMK	Volume in carat	Volume in kilo	Value in MMK	Volume in carat	Volume in kilo	Value in MMK
196	METAL METERO	50,740	-	7,500,000	53,740	-	8,500,000	(3,000)	-	(1,000,000)
198	Than Htike Lu(Mogok)	-	-	-	38,050	6	9,200,000	(38,050)	(6)	(9,200,000)
198	Than Htike Lu(Mongshu)	-	-	-	49,100	-	6,928,000	(49,100)	-	(6,928,000)
199	BIRDS GEM	-	-	-	30,400	-	4,550,000	(30,400)	-	(4,550,000)
200	ZABUKYAWAUNG	-	-	-	7,500	-	2,000,000	(7,500)	-	(2,000,000)
201	KYAN FAMILY	20,100	-	4,500,000	20,100	-	4,500,000	-	-	-
202	Htay Paing(Sharing)	-	-	-	24,000	-	9,000,000	(24,000)	-	(9,000,000)
202	Htay Paing(Private)	10,980	-	7,500,000	10,980	-	7,500,000	-	-	-
209	Myanmar Economic Corporation	-	-	-	56,299	-	11,962,500	(56,299)	-	(11,962,500)
Total Jade production Gems (Carat)		231,982	-	655,723,600	599,119	-	145,963,500	(367,138)	-	509,760,100
Total Jade production Gems (Kilo)		-	174,579		-	33		-	174,547	

**(b) Gems and Jade Sales**

The table below shows the differences between the jade sales reported by Gems and Jade companies and MGE.

**Table 148 : Gems and Jade sales reconciliation**

*Amounts in MMK*

N°	Company	Company				MGE				Differences	
		Volume	Volume-Unit	Value	Currency	Volume	Volume-Unit	Value	Currency	Volume	Value
1	Linn Lett Win Yadanar Gems Co Ltd	257,570	Kg	8,859,038,893	MMK	192,228	Kg	1,791,907,579	MMK	65,342	7,067,131,314
1	Linn Lett Win Yadanar Gems Co Ltd	152,232	Kg	47,653,255	EURO	249,574	Kg	57,600,906	EURO	(97,342)	(9,947,651)
2	Yar Za Htar Ni	-		-	MMK	82,933	Kg	365,887,143	MMK	(82,933)	(365,887,143)
2	Yar Za Htar Ni	179,524	Kg	61,855,720	EURO	147,639	Kg	51,352,076	EURO	31,886	10,503,644
3	YADANAR TAUNG TEN	62,230	Kg	92,939,341	MMK	62,230	Kg	92,939,341	MMK	-	-
3	YADANAR TAUNG TEN	147,799	Kg	35,319,347	EURO	163,379	Kg	36,046,500	EURO	(15,580)	(727,153)
4	Wai Aung Gabar	246,002	Kg	6,747,998,558	MMK	140,802	Kg	2,223,414,380	MMK	105,200	4,524,584,178
4	Wai Aung Gabar	193,141	Kg	32,062,116	EURO	298,341	Kg	34,862,564	EURO	(105,200)	(2,800,448)
5	Ayeyar Yadanar Gems & Jewellery Co .,Ltd	-	Kg	-	MMK	16,550	Kg	160,383,900	MMK	(16,550)	(160,383,900)
5	Ayeyar Yadanar Gems & Jewellery Co .,Ltd	36,380	Kg	8,293,114	EURO	38,598	Kg	8,345,263	EURO	(2,218)	(52,149)
7	SILVER ELEPHANT GEMS CO LTD (Ngwe Sin (NS-S))	26,935	Kg	528,217,545	MMK	26,935	Kg	528,217,545	MMK	-	-
7	SILVER ELEPHANT GEMS CO LTD (Ngwe Sin (NS-S))	160,734	Kg	12,382,506	EURO	130,353	Kg	14,852,187	EURO	30,381	(2,469,681)
8	Phyo Thiha Kyaw	12,569	Kg	363,134,694	MMK	11,805	Kg	11,490,192	MMK	764	351,644,502
8	Phyo Thiha Kyaw	2,392	Kg	16,127,212	EURO	3,156	Kg	16,345,131	EURO	(764)	(217,919)
9	Same Wai Hlaing (SWH)	2,645	Kg	34,855,441	EURO	2,645	Kg	34,855,441	EURO	-	-
10	Mya Garden (GEG)	46,047	Kg	2,685,178,963	MMK	37,165	Kg	161,487,806	MMK	8,882	2,523,691,157
10	Mya Garden (GEG)	40,448	Kg	10,745,873	EURO	49,330	Kg	12,306,230	EURO	(8,882)	(1,560,357)
11	Kan Pwint Oo	4,599	Kg	102,449,167	MMK	4,599	Kg	102,449,167	MMK	-	-
11	Kan Pwint Oo	25,797	Kg	23,748,800	EURO	27,227	Kg	23,941,799	EURO	(1,430)	(192,999)
12	Shwe Ngar Koe Kaung	197	Kg	51,187	MMK	-	Kg	-	MMK	197	51,187
12	Shwe Ngar Koe Kaung	2,951	Kg	1,271,160	EURO	3,148	Kg	1,322,347	EURO	(197)	(51,187)
13	Shwe Gaung Gaung Gems Co Ltd	111,610	Kg	2,135,733,032	MMK	66,800	Kg	160,834,457	MMK	44,810	1,974,898,575
13	Shwe Gaung Gaung Gems Co Ltd	70,375	Kg	3,329,067	EURO	123,817	Kg	4,786,574	EURO	(53,442)	(1,457,507)

N°	Company	Company				MGE				Differences	
		Volume	Volume-Unit	Value	Currency	Volume	Volume-Unit	Value	Currency	Volume	Value
14	Htun Tauk Zabu Gems & Jewellery Co;Ltd.	-	Kg	-	MMK	9,990	Kg	85,941,003	MMK	(9,990)	(85,941,003)
14	Htun Tauk Zabu Gems & Jewellery Co;Ltd.	-	Kg	-	EURO	27,310	Kg	9,312,144	EURO	(27,310)	(9,312,144)
15	Sein Lon Taung Tan (SLTT-S)	97,670	Kg	334,592,142	MMK	97,670	Kg	334,592,142	MMK	-	-
15	Sein Lon Taung Tan (SLTT-S)	224,789	Kg	9,718,635	EURO	224,789	Kg	9,718,635	EURO	-	-
16	Ayar Jade	-	Kg	3,710,443,037	MMK	78,784	Kg	1,392,795,185	MMK	(78,784)	2,317,647,852
16	Ayar Jade	-	Kg	9,328,284	EURO	167,653	Kg	10,760,184	EURO	(167,653)	(1,431,900)
17	Shinning Star Light Gems & Jewellery Co.,Ltd	148,975	Kg	2,965,330,495	MMK	127,903	Kg	567,139,937	MMK	21,072	2,398,190,558
17	Shinning Star Light Gems & Jewellery Co.,Ltd	57,962	Kg	6,817,989	EURO	89,053	Kg	8,574,610	EURO	(31,091)	(1,756,621)
18	Yadanar Sin Thiri Gems Co	4,965	Kg	228,276,782	MMK	22,896	Kg	233,122,759	MMK	(17,931)	(4,845,977)
18	Yadanar Sin Thiri Gems Co	12,726	Kg	1,273,455	EURO	30,336	Kg	1,665,144	EURO	(17,610)	(391,689)
19	SHWE OAK KHAI MINING CO.,LTD.	-	Kg	-	MMK	14,225	Kg	187,779,774	MMK	(14,225)	(187,779,774)
19	SHWE OAK KHAI MINING CO.,LTD.	35,067	kg	12,381,472	EURO	37,110	Kg	9,894,353	EURO	(2,043)	2,487,119
20	Jade Mountain	48,556	kg	517,320,851	MMK	41,470	Kg	102,438,136	MMK	7,086	414,882,715
20	Jade Mountain	23,334	kg	8,328,296	EURO	30,420	Kg	8,585,286	EURO	(7,086)	(256,990)
21	Thirawmani	39,705	kg	1,465,712,617	MMK	25,162	Kg	165,806,145	MMK	14,543	1,299,906,472
21	Thirawmani	32,490	kg	10,651,140	EURO	41,666	Kg	11,351,992	EURO	(9,177)	(700,852)
22	Phoe Thar Htoo	42,562	Kg	1,577,455,290	MMK	31,286	Kg	419,785,269	MMK	11,276	1,157,670,021
22	Phoe Thar Htoo	28,912	Kg	6,668,959	EURO	51,703	Kg	7,384,655	EURO	(22,791)	(715,696)
23	Myanma Seinn Lei Aung Gems Co Ltd.	109,117	kg	922,628,312	MMK	8,718	Kg	248,093,806	MMK	100,399	674,534,506
23	Myanma Seinn Lei Aung Gems Co Ltd.	2,507	kg	2,238,055	EURO	8,113	Kg	2,804,937	EURO	(5,607)	(566,882)
24	Yadanar Yaung Chi	281,061	KG	478,200,924	MMK	4,537	Kg	7,782,099	MMK	276,524	470,418,825
24	Yadanar Yaung Chi	4,954	KG	1,799,972	EURO	5,269	Kg	1,956,761	EURO	(315)	(156,789)
25	Lin Htet Aung	8,793	Kg	311,672,724	MMK	6,805	Kg	15,987,663	MMK	1,988	295,685,061
25	Lin Htet Aung	6,968	Kg	950,691	EURO	5,442	Kg	995,105	EURO	1,526	(44,414)
26	Norbal Three Star (GMMK)	15,587	Kg	186,248,893	MMK	15,587	Kg	186,248,893	MMK	-	-
26	Norbal Three Star (GMMK)	8,080	Kg	9,177,329	EURO	9,092	Kg	9,427,237	EURO	(1,012)	(249,908)
27	WAN BREUROO	-	Kg	-	MMK	6,060	Kg	21,687,779	MMK	(6,060)	(21,687,779)

N°	Company	Company				MGE				Differences	
		Volume	Volume-Unit	Value	Currency	Volume	Volume-Unit	Value	Currency	Volume	Value
27	WAN BREURO	-	Kg	-	EURO	3,683	Kg	20,199,023	EURO	(3,683)	(20,199,023)
28	Mya Yaung Tun	4,410	Kg	6,670,240	MMK	6,250	Kg	12,936,740	MMK	(1,840)	(6,266,500)
28	Mya Yaung Tun	10,075	Kg	189,303	EURO	9,330	Kg	189,303	EURO	745	-
29	Nan Htike Pyae Paing Co	-	Kg	-	MMK	15,708	Kg	241,804,999	MMK	(15,708)	(241,804,999)
29	Nan Htike Pyae Paing Co	10,833	Kg	3,342,903	EURO	8,796	Kg	2,290,506	EURO	2,037	1,052,397
30	Khun Paooe	26,431	Kg	1,594,530,071	MMK	67,526	Kg	374,258,555	MMK	(41,095)	1,220,271,516
30	Khun Paooe	32,098	Kg	7,036,648	EURO	74,236	Kg	8,021,202	EURO	(42,138)	(984,554)
31	Great wall Gems&Jade company (Shwe Tataing)	3,247	Kg	137,519	EURO	3,247	Kg	137,519	EURO	-	-
32	Great Genesis Gems (GMH)	75,619	KG	548,961,066	MMK	75,492	Kg	546,871,066	MMK	127	2,090,000
32	Great Genesis Gems (GMH)	63,246	KG	7,448,401	EURO	63,246	Kg	7,448,401	EURO	-	-
34	Wai Family	5,383	kg	241,958,548	MMK	5,330	Kg	70,760,999	MMK	53	171,197,549
34	Wai Family	3,282	kg	10,602,851	EURO	3,335	Kg	10,706,949	EURO	(53)	(104,098)
35	Sai Taung Co	45	Kg	546,932,816	MMK	33,412	Kg	455,290,258	MMK	(33,367)	91,642,558
35	Sai Taung Co	33	Kg	3,890,133	EURO	19,056	Kg	5,598,232	EURO	(19,023)	(1,708,099)
36	Kyauk Same Nan Taw (GKN)	-		-		25,135	Kg	61,796,682	MMK	(25,135)	(61,796,682)
36	Kyauk Same Nan Taw (GKN)	-		-		3,484	Kg	4,560,512	EURO	(3,484)	(4,560,512)
37	Jade Land	-	Kg	-	MMK	1,120	Kg	6,180,404	MMK	(1,120)	(6,180,404)
39	1 1 1	36,495	Kg	551,147,725	MMK	36,495	Kg	551,147,725	MMK	-	-
39	1 1 1	49,736	Kg	5,649,454	EURO	50,720	Kg	5,942,575	EURO	(984)	(293,121)
40	Kaung Myat Thu Ka	35,524	Kg	790,794,132	MMK	28,989	Kg	133,268,368	MMK	6,535	657,525,764
40	Kaung Myat Thu Ka	55,950	Kg	4,710,392	EURO	64,097	Kg	5,117,943	EURO	(8,147)	(407,551)
42	Khine Myanmar	26,033	Kg	589,243,644	MMK	24,193	Kg	216,754,407	MMK	1,840	372,489,237
42	Khine Myanmar	5,020	Kg	193,242	EURO	1,840	Kg	225,600	EURO	3,180	(32,358)
43	Unity	17,388	Kg	277,707,264	MMK	12,074	Kg	304,810,700	MMK	5,314	(27,103,436)
43	Unity	5,978	Kg	3,353,957	EURO	5,917	Kg	3,223,957	EURO	61	130,000
44	Wai Yan Thar (WYT)	5,020	Kg	29,655,181	MMK	5,020	Kg	29,655,181	MMK	-	-
44	Wai Yan Thar (WYT)	4,120	Kg	74,320	EURO	4,120	Kg	74,320	EURO	-	-
45	Sin Gaung Taung	-	Kg	-	EURO	2,240	Kg	65,388	EURO	(2,240)	(65,388)

N°	Company	Company				MGE				Differences	
		Volume	Volume-Unit	Value	Currency	Volume	Volume-Unit	Value	Currency	Volume	Value
46	GREEN MOUNTAIN CO;LTD	52,414	Kg	1,819,859,569	MMK	1,095	Kg	2,070,000	MMK	51,319	1,817,789,569
46	GREEN MOUNTAIN CO;LTD	24,314	Kg	2,814,147	EURO	39,295	Kg	3,560,098	EURO	(14,981)	(745,951)
47	Chang Long Gems & Jewellery Co Ltd	10,785	Kg	620,577,582	MMK	10,217	Kg	78,044,334	MMK	568	542,533,248
47	Chang Long Gems & Jewellery Co Ltd	1,625	Kg	6,379,489	EURO	2,028	Kg	6,716,574	EURO	(403)	(337,085)
48	Kyaut Myat Min	4,907	Kg	104,846,301	MMK	4,907	Kg	104,846,296	MMK	-	5
48	Kyaut Myat Min	1,808	Kg	268,093	EURO	1,808	Kg	268,093	EURO	-	-
49	Yadanar Shwe Ye Win	8,593	Kg	340,191,367	MMK	6,128	Kg	10,495,778	MMK	2,465	329,695,589
49	Yadanar Shwe Ye Win	4,509	Kg	1,382,488	EURO	6,974	Kg	1,587,251	EURO	(2,465)	(204,763)
50	Myit Sone Ayar	19,879	Kg	817,835,232	MMK	4,935	Kg	27,106,729	MMK	14,944	790,728,503
50	Myit Sone Ayar	17,511	Kg	2,168,269	EURO	34,559	Kg	2,656,332	EURO	(17,048)	(488,063)
51	Yadanar Aung Chan	765	Kg	13,305,030	MMK	-	Kg	-	MMK	765	13,305,030
51	Yadanar Aung Chan	1,390	Kg	151,419	EURO	2,155	Kg	159,648	EURO	(765)	(8,229)
52	Myanmar Imperial Jade Co	13,562	Kg	2,231,706,563	MMK	13,562	Kg	2,231,706,563	MMK	-	-
52	Myanmar Imperial Jade Co	143,643	Kg	11,075,540	EURO	143,643	Kg	11,075,540	EURO	-	-
53	Khin Zaw Aung & Brother	182,122	KG	1,282,717,790	MMK	138,216	Kg	188,547,915	MMK	43,906	1,094,169,875
53	Khin Zaw Aung & Brother	55,945	KG	4,052,088	EURO	99,471	Kg	4,726,925	EURO	(43,526)	(674,837)
54	Myanmar First Gems & Jewellery Co Ltd	43,288	Kg	1,126,614,297	MMK	23,221	Kg	413,380,381	MMK	20,067	713,233,916
54	Myanmar First Gems & Jewellery Co Ltd	48,108	Kg	3,914,665	EURO	68,175	Kg	4,356,039	EURO	(20,067)	(441,374)
55	Ever Winner [EW]	2,358	Kg	137,677,776	MMK	2,023	Kg	84,176,945	MMK	335	53,500,831
55	Ever Winner [EW]	3,540	Kg	1,817,645	EURO	4,075	Kg	1,889,160	EURO	(535)	(71,515)
56	Shwe Hein Htet Gems Co Ltd	140	Kg	51,390,922	MMK	-	Kg	-	MMK	140	51,390,922
56	Shwe Hein Htet Gems Co Ltd	173	Kg	3,907,309	EURO	313	Kg	3,939,308	EURO	(140)	(31,999)
57	Myo Nwe Gems	51,163	Kg	516,975,637	MMK	51,163	Kg	531,905,637	MMK	-	(14,930,000)
57	Myo Nwe Gems	395,543	Kg	4,209,036	EURO	39,543	Kg	4,208,937	EURO	356,000	99
58	Tun Naing Aung	-	Kg	-	MMK	2,264	Kg	69,451,008	MMK	(2,264)	(69,451,008)
58	Tun Naing Aung	6,694	Kg	3,895,196	EURO	7,684	Kg	3,900,295	EURO	(990)	(5,099)
59	Nay Min Kabar Co	47,035	Kg	756,396,786	MMK	3,986	Kg	184,782,187	MMK	43,049	571,614,599
59	Nay Min Kabar Co	13,884	Kg	4,244,297	EURO	15,986	Kg	4,259,443	EURO	(2,102)	(15,146)
60	Zebu Thiri Gems Co.,ltd	2,977	Kg	61,892,555	MMK	2,933	Kg	61,892,555	MMK	44	-

N°	Company	Company				MGE				Differences	
		Volume	Volume-Unit	Value	Currency	Volume	Volume-Unit	Value	Currency	Volume	Value
60	Zebu Thiri Gems Co.,Ltd	6,950	Kg	2,398,246	EURO	6,950	Kg	2,398,246	EURO	-	-
61	Yadanar Three Elephants Co	156,059	Kg	2,154,641,613	MMK	111,241	Kg	1,184,678,499	MMK	44,818	969,963,114
61	Yadanar Three Elephants Co	53,198	Kg	3,396,127	EURO	98,016	Kg	4,001,249	EURO	(44,818)	(605,122)
62	Kyaing International (GKI)	-		-		48,386	Kg	484,121,246	MMK	(48,386)	(484,121,246)
62	Kyaing International (GKI)	-		-		32,568	Kg	4,565,301	EURO	(32,568)	(4,565,301)
63	Nan Oo Yadanar	8,966	Kg	340,453,296	MMK	7,504	Kg	240,905,538	MMK	1,462	99,547,758
63	Nan Oo Yadanar	4,162	Kg	372,620	EURO	5,563	Kg	442,154	EURO	(1,401)	(69,534)
64	Su Htu Pan (Su Htoo Pan)	4,015	KG	8,533,333	MMK	4,015	Kg	8,533,333	MMK	-	-
64	Su Htu Pan (Su Htoo Pan)	968	KG	294,565	EURO	968	Kg	294,565	EURO	-	-
65	Long Byit	-	Kg	-	MMK	2,379	Kg	24,499,442	MMK	(2,379)	(24,499,442)
65	Long Byit	-	Kg	-	EURO	1,590	Kg	21,218	EURO	(1,590)	(21,218)
67	Win Lei Yadanar	4,361	Kg	75,907,128	MMK	2,466	Kg	8,860,577	MMK	1,895	67,046,551
67	Win Lei Yadanar	1,066	Kg	154,886	EURO	2,449	Kg	195,508	EURO	(1,383)	(40,622)
68	Kyal Sin Phyu	462	Kg	36,999	EURO	462	Kg	36,999	EURO	-	-
69	Treasure Star Co., Ltd. (Yadanar kyal)	5,913	Kg	2,724,333,985	MMK	8,191	Kg	120,523,150	MMK	(2,279)	2,603,810,835
69	Treasure Star Co., Ltd. (Yadanar kyal)	2,020	Kg	2,555,551	EURO	2,267	Kg	4,182,549	EURO	(247)	(1,626,998)
70	ARS Gems [ARS]	14,310	Kg	161,236,817	MMK	13,075	Kg	52,009,291	MMK	1,235	109,227,526
70	ARS Gems [ARS]	3,974	Kg	921,166	EURO	5,209	Kg	989,065	EURO	(1,236)	(67,899)
71	Yadanar Pyae Phyoo Aung	8,532	Kg	250,771,926	MMK	10,275	Kg	47,336,652	MMK	(1,743)	203,435,274
71	Yadanar Pyae Phyoo Aung	3,631	Kg	540,075	EURO	3,760	Kg	1,172,806	EURO	(129)	(632,731)
72	Jade Padatar Gems Co,Ltd	35,141	Kg	622,486,017	MMK	35,465	Kg	622,486,017	MMK	(324)	-
72	Jade Padatar Gems Co,Ltd	12,432	Kg	2,571,643	EURO	12,432	Kg	2,094,643	EURO	-	477,000
73	Ruby Dragon Company	7,399	Pcs	208,873,214	MMK	-	Kg	-	MMK	7,399	208,873,214
74	Northern Jade World	-	Kg	-	EURO	1,478	Kg	189,456	EURO	(1,478)	(189,456)
75	Kaung Htet Khaing	-	Kg	25,182,048	MMK	-	Kg	-	MMK	-	25,182,048
75	Kaung Htet Khaing	5,460	Kg	59,357	EURO	5,460	Kg	74,769	EURO	-	(15,412)
76	Kaung Swan Htet Co	72,483	Kg	1,525,736,088	MMK	60,131	Kg	937,048,626	MMK	12,352	588,687,462
76	Kaung Swan Htet Co	13,701	Kg	1,851,681	EURO	26,053	Kg	2,190,123	EURO	(12,352)	(338,442)
77	Shwe Ywat Hlwar	4,747	Kg	70,190,106	MMK	4,747	Kg	70,190,106	MMK	-	-

N°	Company	Company				MGE				Differences	
		Volume	Volume-Unit	Value	Currency	Volume	Volume-Unit	Value	Currency	Volume	Value
77	Shwe Ywat Hlwar	2,165	Kg	203,214	EURO	2,360	Kg	203,214	EURO	(195)	-
78	Same Lei Yadanar Win Co (SLYW)	-	Kg	-	MMK	15,790	Kg	289,484,976	MMK	(15,790)	(289,484,976)
78	Same Lei Yadanar Win Co (SLYW)	-	Kg	-	EURO	18,294	Kg	8,207,750	EURO	(18,294)	(8,207,750)
79	Hpakan King Gems & Jewellery Co. Ltd (Phar kant Bayin)	5,745	Kg	18,000,242	MMK	4,025	Kg	18,000,242	MMK	1,720	-
79	Hpakan King Gems & Jewellery Co. Ltd (Phar kant Bayin)	880	Kg	183,188	EURO	842	Kg	183,188	EURO	38	-
80	Agga Yadanar	8,398	Kg	882,829,459	MMK	14,319	Kg	227,045,810	MMK	(5,921)	655,783,649
80	Agga Yadanar	21,086	Kg	1,607,202	EURO	15,519	Kg	2,960,564	EURO	5,567	(1,353,362)
81	Shwe War Myae (mandalay)	17,388	Kg	9,105,000	MMK	1,160	Kg	9,105,000	MMK	16,228	-
81	Shwe War Myae (mandalay)	5,978	Kg	3,353,957	EURO	1,676	Kg	132,348	EURO	4,302	3,221,609
82	Delta Land	-	Kg	-	EURO	363	Kg	693,306	EURO	(363)	(693,306)
83	Seine Lone Aung	5,600	Kg	10,160,229	MMK	4,610	Kg	10,160,229	MMK	990	-
83	Seine Lone Aung	1,133	Kg	143,899	EURO	1,133	Kg	143,899	EURO	-	-
84	Aung Hein Minn	-	Kg	-	MMK	5,676	Kg	128,205,098	MMK	(5,676)	(128,205,098)
84	Aung Hein Minn	-	Kg	-	EURO	20,639	Kg	1,044,003	EURO	(20,639)	(1,044,003)
85	Kyauk Seinn Sun Shwin Jade Gems & Jewellery Co Ltd	-	Kg	-	MMK	27,300	Kg	119,165,781	MMK	(27,300)	(119,165,781)
85	Kyauk Seinn Sun Shwin Jade Gems & Jewellery Co Ltd	-	Kg	-	EURO	18,552	Kg	6,993,821	EURO	(18,552)	(6,993,821)
86	Yadanar Aung Tun Tauk	2,022	Kg	158,680	EURO	1,968	Kg	158,680	EURO	54	-
87	U YA GEMS	-	Kg	-	MMK	59,746	Kg	119,590,780	MMK	(59,746)	(119,590,780)
87	U YA GEMS	19,350	Kg	2,656,653	EURO	22,213	Kg	2,671,916	EURO	(2,863)	(15,263)
88	Chaung Brother	33,119	Kg	778,977,101	MMK	20,874	Kg	311,668,567	MMK	12,245	467,308,534
88	Chaung Brother	25,376	Kg	1,191,609	EURO	39,031	Kg	1,555,170	EURO	(13,655)	(363,561)
89	Myat Yamon	64,240	Kg	271,068,722	MMK	66,050	Kg	271,978,722	MMK	(1,810)	(910,000)
89	Myat Yamon	36,074	Kg	3,157,843	EURO	36,854	Kg	3,179,352	EURO	(780)	(21,509)
90	Nay La Pwint	87,270	Kg	641,529,143	MMK	62,450	Kg	131,145,002	MMK	24,820	510,384,141
90	Nay La Pwint	14,189	Kg	2,562,793	EURO	39,009	Kg	2,873,077	EURO	(24,820)	(310,284)

N°	Company	Company				MGE				Differences	
		Volume	Volume-Unit	Value	Currency	Volume	Volume-Unit	Value	Currency	Volume	Value
91	Ma Li Kha Gem Stone Co	-	Kg	111,148	EURO	1,525	Kg	1,321,697	EURO	(1,525)	(1,210,549)
92	Wan Full	-		-		4,510	Kg	6,700,122	MMK	(4,510)	(6,700,122)
92	Wan Full	-		-		1,185	Kg	177,776	EURO	(1,185)	(177,776)
94	Yadanar Moe Myay	3,915	Kg	209,685,695	MMK	3,915	Kg	209,685,695	MMK	-	-
94	Yadanar Moe Myay	4,020	Kg	268,649	EURO	4,020	Kg	268,649	EURO	-	-
95	Shine Family	5,323	Kg	94,414,368	MMK	5,100	Kg	55,974,568	MMK	223	38,439,800
95	Shine Family	1,824	Kg	162,961	EURO	-	Kg	-	EURO	1,824	162,961
96	Thein Gabar Aung	16,010	Kg	248,170,437	MMK	12,500	Kg	164,116,353	MMK	3,510	84,054,084
96	Thein Gabar Aung	5,095	Kg	203,043	EURO	8,605	Kg	254,405	EURO	(3,510)	(51,362)
97	Jade Treasure	22,515	Kg	921,323,451	MMK	16,870	Kg	113,122,296	MMK	5,645	808,201,155
97	Jade Treasure	14,100	Kg	640,193	EURO	18,925	Kg	1,139,333	EURO	(4,825)	(499,140)
98	Lawka Nandar	18,733	Kg	118,059,885	MMK	16,703	Kg	92,826,552	MMK	2,030	25,233,333
98	Lawka Nandar	15,754	Kg	1,611,178	EURO	13,264	Kg	1,590,499	EURO	2,490	20,679
99	Ngwe Si Hein	-		-		3,075	Kg	111,434,887	MMK	(3,075)	(111,434,887)
99	Ngwe Si Hein	-		-		1,019	Kg	593,209	EURO	(1,019)	(593,209)
100	Myat Pan Khaing	-		-		573	Kg	6,900,999	EURO	(573)	(6,900,999)
102	Shwe Yaung Sin	91,835	Kg	343,058,400	MMK	1,850	Kg	104,892,194	MMK	89,985	238,166,206
102	Shwe Yaung Sin	1,850	Kg	104,892,194	EURO	4,243	Kg	546,399	EURO	(2,393)	104,345,795
103	Hein Aung Lin Htet Jade Co. Ltd	11,153	Kg	49,720,117	MMK	11,153	Kg	49,720,117	MMK	-	-
103	Hein Aung Lin Htet Jade Co. Ltd	4,614	Kg	422,157	EURO	6,007	Kg	561,245	EURO	(1,393)	(139,088)
104	Phar Kant Sai Bon	-		-		5	Kg	40,009	EURO	(5)	(40,009)
105	Thigi Myintzu Yadanar	6,655	Kg	48,312,000	MMK	6,655	Kg	48,312,000	MMK	-	-
105	Thigi Myintzu Yadanar	10,595	Kg	331,949,893	EURO	10,595	Kg	315,057	EURO	-	331,634,836
106	Same Nay Chi (SNC)	16,194	Kg	85,926,226	MMK	17,076	Kg	91,326,225	MMK	(882)	(5,399,999)
106	Same Nay Chi (SNC)	38,954	Kg	2,634,798	EURO	38,954	Kg	2,883,430	EURO	-	(248,632)
107	Seine Light	-		-		2,958	Kg	270,000	EURO	(2,958)	(270,000)
108	New Lucky Green Gems	1,149	Kg	9,730,808	MMK	1,149	Kg	9,730,808	MMK	-	-
108	New Lucky Green Gems	2,348	Kg	16,924	EURO	2,348	Kg	16,924	EURO	-	-
109	Mya San Dar (MSD)	-	Kg	-	EURO	1,240	Kg	16,988	EURO	(1,240)	(16,988)



N°	Company	Company				MGE				Differences	
		Volume	Volume-Unit	Value	Currency	Volume	Volume-Unit	Value	Currency	Volume	Value
110	Jade Thazin	5,258	Kg	40,127,030	MMK	5,258	Kg	40,127,030	MMK	-	-
110	Jade Thazin	7,118	Kg	218,220	EURO	7,118	Kg	218,220	EURO	-	-
111	Kaung Su Aung	-	Kg	345,146,400	MMK	19,917	Kg	53,370,422	MMK	(19,917)	291,775,978
111	Kaung Su Aung	-	Kg	1,421,996	EURO	11,605	Kg	2,598,137	EURO	(11,605)	(1,176,141)
112	Kachin National Development	-		-		18,653	Kg	163,892,480	MMK	(18,653)	(163,892,480)
112	Kachin National Development	-		-		17,330	Kg	1,007,214	EURO	(17,330)	(1,007,214)
113	Kyaut Seinn Tapyay	3,062	Kg	79,841,217	MMK	3,062	Kg	79,841,217	MMK	-	-
113	Kyaut Seinn Tapyay	1,413	Kg	102,263	EURO	1,413	Kg	102,263	EURO	-	-
114	Kaung Wai Yan Co	-		-		1,840	Kg	3,001,977	MMK	(1,840)	(3,001,977)
114	Kaung Wai Yan Co	-		-		507	Kg	277,025	EURO	(507)	(277,025)
115	Green Diamond Gems & Jewellery Co. Ltd (Seine Sein)	10,095	kg	46,277,269	MMK	10,095	Kg	46,277,269	MMK	-	-
115	Green Diamond Gems & Jewellery Co. Ltd (Seine Sein)	571	kg	368,548	EURO	571	Kg	368,548	EURO	-	-
116	Lucky Star Jade Group	1,936	KG	269,858,478	MMK	-	Kg	-	MMK	1,936	269,858,478
116	Lucky Star Jade Group	1,416	KG	563,776	EURO	3,352	Kg	730,209	EURO	(1,936)	(166,433)
118	Ah Mhan Akhan Kyauk Seinn	5,480	Kg	10,570,666	MMK	5,480	Kg	10,570,666	MMK	-	-
118	Ah Mhan Akhan Kyauk Seinn	2,109	Kg	360,762	EURO	2,109	Kg	360,762	EURO	-	-
119	Jewel Crown Company (Yadanar Thayaphu)	26,277	Kg	577,990,109	MMK	24,317	Kg	338,665,688	MMK	1,960	239,324,421
119	Jewel Crown Company (Yadanar Thayaphu)	13,846	Kg	733,546	EURO	15,806	Kg	880,281	EURO	(1,960)	(146,735)
120	Kaung Mon Yadanar	-	Kg	-	MMK	4,690	Kg	7,302,381	MMK	(4,690)	(7,302,381)
120	Kaung Mon Yadanar	-	Kg	-	EURO	1,370	Kg	228,874	EURO	(1,370)	(228,874)
122	Global Sun Light	11,168	Kg	171,752,063	MMK	10,835	Kg	57,519,232	MMK	333	114,232,831
122	Global Sun Light	1,201	Kg	273,656	EURO	1,534	Kg	344,953	EURO	(333)	(71,297)
124	Value Standard (Ah Phoe Tan San Chain Mhe)	10,837	kg	169,009,772	MMK	7,837	Kg	125,920,873	MMK	3,000	43,088,899
124	Value Standard (Ah Phoe Tan San Chain Mhe)	6,657	kg	1,622,193	EURO	9,270	Kg	1,664,456	EURO	(2,613)	(42,263)
125	Seine Aung	-		-		2,793	Kg	2,457,730	EURO	(2,793)	(2,457,730)
126	Myint Shinn	415	Kg	1,071,945	EURO	190	Kg	7,519	EURO	225	1,064,426
129	Jade Shae Saung	-	Kg	-	MMK	910	Kg	39,289,000	MMK	(910)	(39,289,000)

N°	Company	Company				MGE				Differences	
		Volume	Volume-Unit	Value	Currency	Volume	Volume-Unit	Value	Currency	Volume	Value
129	Jade Shae Saung	-	Kg	-	EURO	213	Kg	14,763	EURO	(213)	(14,763)
130	Jade Min (Kyauk Seinn Minn Gems)	4,068	Kg	461,275,018	MMK	2,118	Kg	237,246,097	MMK	1,950	224,028,921
130	Jade Min (Kyauk Seinn Minn Gems)	1,777	Kg	1,595,460	MMK	-		-	MMK	1,777	1,595,460
131	Yi Li Fa [YLF]	-		-		889	Kg	5,001,896	EURO	(889)	(5,001,896)
132	Pyi Yadanar	-		-		1,629	Kg	4,835,556	EURO	(1,629)	(4,835,556)
133	MELODIOUS GEMS COMPANY LIMITED (Tharyar Kyinu Phwe)	90	Kg	10,112,052	MMK	-	Kg	-	MMK	90	10,112,052
133	MELODIOUS GEMS COMPANY LIMITED (Tharyar Kyinu Phwe)	4,085	Kg	322,760	EURO	4,175	Kg	329,015	EURO	(90)	(6,255)
134	Myanmar Thura [MTY]	8,910	Kg	10,564,450	MMK	2,650	Kg	2,490,006	MMK	6,260	8,074,444
134	Myanmar Thura [MTY]	18,597	Kg	8,480,613	EURO	11,101	Kg	4,138,214	EURO	7,496	4,342,399
136	Hole In One	-	Kg	-	EURO	330	Kg	43,830	EURO	(330)	(43,830)
137	Nay Chi Yadanar	1,530	Kg	173,920,257	MMK	-	Kg	-	MMK	1,530	173,920,257
137	Nay Chi Yadanar	5,069	Kg	1,256,260	EURO	6,599	Kg	1,362,716	EURO	(1,530)	(106,456)
138	Kyauk Sein Win Kabar	-	Kg	-	MMK	27,210	Kg	183,867,965	MMK	(27,210)	(183,867,965)
138	Kyauk Sein Win Kabar	-	Kg	-	EURO	25,260	Kg	2,890,466	EURO	(25,260)	(2,890,466)
139	Ou Ryu Sein Yadanar	-		-		428	Kg	50,892	EURO	(428)	(50,892)
141	Sein Minn Yadanar	-		-		990	Kg	37,596	EURO	(990)	(37,596)
143	Kyei Linn Gems & Jade Company	8	KG	6,677,880	MMK	-	Kg	-	MMK	8	6,677,880
143	Kyei Linn Gems & Jade Company	66	KG	5,909	EURO	74	Kg	10,039	EURO	(8)	(4,130)
144	Ngwe Young Stone	-	Kg	759,017	EURO	352	Kg	759,017	EURO	(352)	-
145	Wan Chang (Wan Chan)	-		-		1,473	Kg	92,937	EURO	(1,473)	(92,937)
146	Khine Lon	6,738	Kg	142,962,575	MMK	6,738	Kg	142,962,575	MMK	-	-
146	Khine Lon	2,531	Kg	1,474,822	EURO	2,531	Kg	1,474,822	EURO	(0)	-
147	Pon Taung Thar	3,582	Kg	35,331,116	MMK	-	Kg	-	MMK	3,582	35,331,116
147	Pon Taung Thar	10,840	Kg	652,609	EURO	3,158	Kg	607,976	EURO	7,682	44,633
149	Treasure Linn (Yadanar Linn)	3,842	Kg	176,900,456	MMK	3,378	Kg	22,711,623	MMK	464	154,188,833
149	Treasure Linn (Yadanar Linn)	3,511	Kg	127,399	EURO	3,975	Kg	222,992	EURO	(464)	(95,593)
150	Treasure White Lotus (Yadanar Kyar Phyu)	11,960	Kg	192,612,204	MMK	7,280	Kg	54,438,850	MMK	4,680	138,173,354

N°	Company	Company				MGE				Differences	
		Volume	Volume-Unit	Value	Currency	Volume	Volume-Unit	Value	Currency	Volume	Value
150	Treasure White Lotus (Yadanar Kyar Phyu)	2,546	Kg	414,567	EURO	5,191	Kg	498,896	EURO	(2,645)	(84,329)
151	Sein Thura San	-	Kg	-	MMK	3,634	Kg	4,684,000	MMK	(3,634)	(4,684,000)
151	Sein Thura San	-	Kg	-	EURO	8,545	Kg	1,769,139	EURO	(8,545)	(1,769,139)
152	Aung Shwe Kabar	-		-		2,460	Kg	121,100,009	MMK	(2,460)	(121,100,009)
152	Aung Shwe Kabar	-		-		1,314	Kg	31,899	EURO	(1,314)	(31,899)
153	San Taw Win	-		-		415	Kg	1,899,577	MMK	(415)	(1,899,577)
153	San Taw Win	-		-		373	Kg	1,442,444	EURO	(373)	(1,442,444)
156	Aung Myin Thu Gems & Jewellery Co.,Ltd	-	Carat	914,972,948	MMK	4,250	Kg	29,582,776	MMK	(4,250)	885,390,172
156	Aung Myin Thu Gems & Jewellery Co.,Ltd	-	KG	731,882	EURO	5,475	Kg	1,525,769	EURO	(5,475)	(793,887)
157	Gold Jade	7,485	kg	577,507,770	MMK	3,155	Kg	5,501,600	MMK	4,330	572,006,170
157	Gold Jade	10,860	kg	833,375	EURO	15,190	Kg	1,183,151	EURO	(4,330)	(349,776)
158	Thet Hein	220	KG	25,360,778	MMK	5,692	Kg	16,770,607	MMK	(5,472)	8,590,171
158	Thet Hein	878	Kg	7,334	EURO	1,280	Kg	78,213	EURO	(402)	(70,879)
159	Myanmar Kywal Wa Thaw Myay (Myanmar Rich Land Gems)	8,665	Kg	1,533,870,381	MMK	9,225	Kg	14,000,026	MMK	(561)	1,519,870,355
159	Myanmar Kywal Wa Thaw Myay (Myanmar Rich Land Gems)	6,907	Kg	633,705	EURO	16,532	Kg	1,578,622	EURO	(9,625)	(944,917)
160	MEGA STAR JEWEL LIMITED	8,758	Kg	79,922,025	MMK	3,540	Kg	16,522,466	MMK	5,218	63,399,559
160	MEGA STAR JEWEL LIMITED	1,342	Kg	164,486	EURO	776	Kg	193,843	EURO	566	(29,357)
161	Kan Sein Pwint	-		-		980	Kg	23,833,321	MMK	(980)	(23,833,321)
162	Myanmar Winning Gate (GMWG)	-		-		5,722	Kg	4,616,009	MMK	(5,722)	(4,616,009)
162	Myanmar Winning Gate (GMWG)	-		-		2,037	Kg	562,065	EURO	(2,037)	(562,065)
163	San Family	13,036	Kg	31,408,797	MMK	13,036	Kg	31,408,797	MMK	-	-
163	San Family	6,754	Kg	615,458	EURO	7,105	Kg	633,158	EURO	(351)	(17,700)
164	Hone Yin Yi Shin	1,823	Kg	230,991	EURO	1,823	Kg	230,991	EURO	-	-
165	Green Comet gems& Jade company (Kyal Ta Khon Sein)	2,826	KG	201,998	EURO	2,826	Kg	201,998	EURO	-	-
166	Gandawin Kyaut Myat Garden	4,974	Kg	69,454,542	MMK	4,784	Kg	51,757,094	MMK	190	17,697,448
166	Gandawin Kyaut Myat Garden	3,465	Kg	153,894	EURO	-	Kg	-	EURO	3,465	153,894

N°	Company	Company				MGE				Differences	
		Volume	Volume-Unit	Value	Currency	Volume	Volume-Unit	Value	Currency	Volume	Value
169	80000	3,989	Kg	76,310,000	MMK	2,012	Kg	74,000,000	MMK	1,977	2,310,000
169	80000	2,144	Kg	3,409,803	EURO	2,144	Kg	3,409,803	EURO	-	-
170	Than Lwin Kyaw Kyar	7,366	Kg	426,543,452	MMK	6,751	Kg	355,760,002	MMK	615	70,783,450
170	Than Lwin Kyaw Kyar	6,370	Kg	467,005	EURO	6,985	Kg	510,758	EURO	(615)	(43,753)
171	Gems Shwe Pyi Co	-	Kg	-	MMK	13,700	Kg	473,263,533	MMK	(13,700)	(473,263,533)
171	Gems Shwe Pyi Co	-	Kg	-	EURO	22,196	Kg	3,569,780	EURO	(22,196)	(3,569,780)
172	Moe BrEUROO	-		-		3,357	Kg	239,494	EURO	(3,357)	(239,494)
173	Innwa Nay Chi Co	4,460	Kg	123,641,997	MMK	4,460	Kg	123,641,997	MMK	-	-
173	Innwa Nay Chi Co	10,680	Kg	94,331,885	EURO	10,680	Kg	244,892	EURO	-	94,086,993
174	Jade Master	10,142	Kg	34,207,597	MMK	10,142	Kg	34,207,597	MMK	-	-
174	Jade Master	3,178	Kg	208,495	EURO	3,178	Kg	208,495	EURO	-	-
176	Shwe Tun Win	27,651	Kg	97,845,150	MMK	3,320	Kg	102,100,666	MMK	24,331	(4,255,516)
176	Shwe Tun Win	3,161	Kg	97,845,150	EURO	6,175	Kg	1,304,359	EURO	(3,014)	96,540,791
180	Pang Huke Duwa Co.,Ltd	-	Kg	-	MMK	1,625	Kg	376,080,998	MMK	(1,625)	(376,080,998)
180	Pang Huke Duwa Co.,Ltd	-	Kg	783,145	EURO	3,521	Kg	783,145	EURO	(3,521)	-
181	Shwe Pyi Thar Thama	38,705	KG	204,755,838	MMK	2,140	Kg	160,029,999	MMK	36,565	44,725,839
181	Shwe Pyi Thar Thama	20,787	KG	1,168,096	EURO	20,787	Kg	1,168,096	EURO	-	-
182	Khant Shwe Pyi Co.,Ltd	4,054	KG	12,560,329	EURO	3,438	Kg	2,148,344	EURO	616	10,411,985
184	Lyan Shan	-	Kg	299,185,077	MMK	29,214	Kg	247,332,859	MMK	(29,214)	51,852,218
184	Lyan Shan	-	Kg	335,467	EURO	19,831	Kg	386,842	EURO	(19,831)	(51,375)
185	Yadanar Myat Noe Thwe Gem	12,310	Kg	188,839,161	MMK	8,975	Kg	19,501,297	MMK	3,335	169,337,864
185	Yadanar Myat Noe Thwe Gem	5,440	Kg	210,084	EURO	8,775	Kg	315,488	EURO	(3,335)	(105,404)
186	Kyi Wai Yan	11,875	Kg	30,112,999	MMK	11,875	Kg	30,112,999	MMK	-	-
186	Kyi Wai Yan	10,690	Kg	20,119,575	EURO	10,690	Kg	155,890	EURO	-	19,963,685
187	Yadanar San Shwin Gem	2,834	Kg	245,299,887	MMK	2,834	Kg	185,899,887	MMK	-	59,400,000
187	Yadanar San Shwin Gem	11,942	Kg	807,650	EURO	11,942	Kg	807,650	EURO	-	-
204	KYAW NAING & BREUROO	360	Kg	52,835,840	MMK	8,260	Kg	214,335,614	MMK	(7,900)	(161,499,774)
204	KYAW NAING & BREURO	8,480	Kg	467,380	EURO	8,840	Kg	499,380	EURO	(360)	(32,000)
205	LAW LU	-		-		641	Kg	44,100	EURO	(641)	(44,100)

N°	Company	Company				MGE				Differences	
		Volume	Volume-Unit	Value	Currency	Volume	Volume-Unit	Value	Currency	Volume	Value
206	MYANMAR SITHU	346	Kg	33,867,989	MMK	-	Kg	-	MMK	346	33,867,989
206	MYANMAR SITHU	1,055	Kg	21,997	EURO	1,401	Kg	43,139	EURO	(346)	(21,142)
208	Pwint Phoo Nadi	-		-		990	Kg	10,777	EURO	(990)	(10,777)
209	Myanmar Economic Corporation	-		-		2,084	Kg	935,493	EURO	(2,084)	(935,493)
Total Jade Sales (MMK)		3,254,047	KG	70,149,095,092	MMK	2,749,434	KG	27,384,178,094	MMK	504,613	42,764,916,998
Total Jade Sales (EUR)		2,954,767	KG	1,193,711,829	EURO	3,641,627	KG	646,733,723	EURO	(686,860)	546,978,106

#### Actual MGE, Gems Sales

N°	Company	Company				MGE					Differences			
		Volume	Volume-Unit	Value	Currency	Volume in carat	Volume in kilo	Volume-Unit	Value	Currency	Volume in carat	Volume in kilo	Value in MMK	Value in EUR
30	Khun Paooe	-	Kg	30,443,483	MMK	-	12	Carat/Kilo	19,011	Euro	-	-	30,443,483	(19,011)
45	Sin Gaung Taung	1	Lots	20,508,375	MMK	-	-	-	-	-	1	-	20,508,375	-
45	Sin Gaung Taung	4	Lots	52,888	Euro	-	-	-	-	-	4	-	-	52,888
65	Long Byit	-	-	-	-	-	4	Carat/Kilo	23,888	Euro	-	(4)	-	(23,888)
73	Ruby Dragon Company	217,265	Carat	3,362,397,630	MMK	179,065	4	Carat/Kilo	3,178,827,168	MMK	-	(4)	183,570,462	-
73	Ruby Dragon Company					38,200	-	Carat/Kilo	114,600	Euro				
84	Aung Hein Minn	25,558	KG	1,140,375,862	MMK	-	-	-	-	-	-	25,558	1,140,375,862	-
85	Kyauk Seinn Sun Shwin Jade Gems & Jewellery Co Ltd	-	-	-	-	-	10	Carat/Kilo	149,444	Euro	-	(10)	-	(149,444)
114	Kaung Wai Yan Co	2,197	Kg	75,716,054	MMK	-	-	-	-	-	-	2,197	75,716,054	-
114	Kaung Wai Yan Co	168	Kg	221,213	Euro	-	-	-	-	-	-	168	-	221,213
138	Kyauk Sein Win Kabar	-	-	-	-	-	4	Carat/Kilo	80,199	Euro	-	(4)	-	(80,199)
183	Nilar Yoma	13	Kg	79,291	Others	-	13	Carat/Kilo	79,291	Euro	-	-	-	-
184	Lyan Shan	-	Carat	8,018,800	MMK	7,800	-	Carat/Kilo	17,299,990	MMK	(7,800)	-	(9,281,190)	-
184	Lyan Shan	-	Carat	550,519	Euro	233,000	-	Carat/Kilo	519,824	Euro	(233,000)	-	-	30,695
189	MOGOK PRIDE	540	Carat	6,500,000	MMK	11,600	-	Carat/Kilo	6,500,000	MMK	(11,060)	-	-	-
189	MOGOK PRIDE	1,785	Carat	6,200	Others	15,500	-	Carat/Kilo	6,200	Euro	(13,715)	-	-	-

N°	Company	Company				MGE					Differences			
		Volume	Volume-Unit	Value	Currency	Volume in carat	Volume in kilo	Volume-Unit	Value	Currency	Volume in carat	Volume in kilo	Value in MMK	Value in EUR
191	CHIT KYI YAE	-	-	-	-	1,950	-	Carat/Kilo	8,018,800	MMK	(1,950)	-	(8,018,800)	-
191	CHIT KYI YAE	-	-	-	-	5,200	-	Carat/Kilo	30,695	Euro	(5,200)	-	-	(30,695)
192	SHWE NAING TUN	-	-	-	-	-	95	Carat/Kilo	3,266	Euro	-	(95)	-	(3,266)
193	R.B.G	8,720	Carat	241,509,002	MMK	6,670	-	Carat/Kilo	223,888,800	MMK	-	-	17,620,202	(11,000)
193	R.B.G	-	-	-	-	2,050	-	Carat/Kilo	11,000	Euro	-	-	-	-
194	KHINE THIT SAR	8,106	Carat	113,960,247	MMK	6,500	-	Carat/Kilo	3,000,000	MMK	-	-	110,960,247	-
194	KHINE THIT SAR	-	-	-	-	1,606	-	Carat/Kilo	68,979	Euro	-	-	-	-
196	METAL METERO	57,200	Carat	4,608	Euro	57,200	-	Carat/Kilo	4,608	Euro	-	-	-	-
198	THAN HTIKE LU	-	-	-	-	-	2	Carat/Kilo	231,875	Euro	-	(2)	-	(231,875)
200	ZABUKYAWAUNG	-	-	-	-	16,000	-	Carat/Kilo	16,774,355	MMK	(16,000)	-	(16,774,355)	-
200	ZABUKYAWAUNG	-	-	-	-	40,100	-	Carat/Kilo	50,983	Euro	(40,100)	-	-	(50,983)
201	KYAN FAMILY	-	-	-	-	14,700	-	Carat/Kilo	24,800,000	MMK	(14,700)	-	(24,800,000)	-
201	KYAN FAMILY	11,000	Carat	14,100	Others	11,000	-	Carat/Kilo	14,100	Euro	-	-	-	-
202	HTAY PAING	-	-	-	-	37,100	-	Carat/Kilo	58,616,500	MMK	(37,100)	-	(58,616,500)	-
202	Htay Paing	-	Carat	174,171	Euro	25,897	-	Carat/Kilo	174,171	Euro	(25,897)	-	-	-
209	Myanmar Economic Corporation	-	-	-	-	1,382	15	Carat/Kilo	193,046	Euro	(1,382)	(15)	(193,046)	-
Total Gem Sales (MMK)		234,630.10	Carat	3,732,385,679		281,384.50	Carat		3,537,725,613		(46,754)		194,660,066	
		27,756.00	Kilo	1,267,043,774		3.75	Kilo	-	-		-	27,752	1,267,043,774	
Total Gem Sales (EUR)		69,985.00	Carat	749,598		431,134.23	Carat		1,188,206		(361,149)			(438,608)
		184.50	Kilo	353,392		154.12	Kilo		586,974		-	30		(233,582)

### 5.7.3. Other Minerals

#### (a) Other Minerals Production

The table below shows the differences between the production reported by the other minerals' companies and ME1/ME2:

**Table 149 : Other minerals production reconciliation**

N°	Company	Mineral Type	Company		Government		Differences
			Volume	Unit	Volume	Volume-Unit	Volume
1	National Prosperity Gold Production Group Limited	Refined Gold	13,072	Troy Ounces	37,020	Toz	-23,949
		Marble Stone	3,730	MT	3,730		0
		Clay			86,515	MT	-86,515
2	MYANMAR ECONOMIC CORPORATION LIMITED	Gypsum			76,464	MT	-76,464
		Coal			36,500	MT	-36,500
		Lime Stone			487,299	MT	-487,299
3	GEO ASIA INDUSTRY & MINING COMPANY LIMITED	Gold	56		3,509	Toz	-3,454
4	CORNERSTONE RESOURCES (MYANMAR) LTD.	Zinc Ore	10,000	MT	3,800	MT	6,200
5	ETERNAL MINING COMPANY LIMITED	Gold	3,935	Troy Ounces	2,346	Toz	1,589
		Cathode Copper	70,756	MT			70,756
6	MYANMA ECONOMIC HOLDINGS PUBLIC COMPANY LIMITED	Bauxite			5,426	MT	-5,426
		Lime Stone			156,620	MT	-156,620
7	KAYAH STATE MINERAL PRODUCTION COMPANY LIMITED	Tin, Tungsten & Mixed Ore	147	MT	488.71	MT	341,71
8	SHWE MOE YAN COMPANY LIMITED	Gold			1,141	Toz	-1,141
		Lead Ore		MT	700	MT	-700
9	GPS JOINT VENTURE COMPANY LIMITED		0	MT	0	MT	0
		Lead Ore			250	MT	-250
10	SHWE TAUNG MINING COMPANY LIMITED	coal	71,200	MT	71,200	MT	0
		Limestone	683,640	MT	683,640	MT	0
		Mudstone	10,975	MT			10,975
11	DELCO LIMITED	Tin & Tungsten	377	MT	362	MT	15

N°	Company	Mineral Type	Company		Government		Differences
			Volume	Unit	Volume	Volume-Unit	Volume
12	MAX (MYANMAR) COMPANY LIMITED	Coal	73,407	MT	73,407	MT	0
		Lime Stone	224,505	MT	227,140	MT	-2,635
13	FIRST RESOURCES COMPANY LIMITED	Gypsum	0		194,076	MT	-194,076
14	PACIFIC LINK CEMENT INDUSTRIES LIMITED	Lime Stone			1,939,800	MT	-1,939,800
15	WIN MYINT MO INDUSTRIES COMPANY LIMITED	Zinc Concentrate	2,804	MT			2,804
		Mixed Concentrate	117	MT			117
		Pbs Concentrate	876	MT			876
		Zinc Concentrate	825	MT	825	MT	0
		Lead Concentrate	2,251	MT	2,251	MT	0
16	No. (2)Heavy Industry, Ministry of Industry	Lime Stone	0		1,060,243	MT	-1,060,243
		Bauxite			124,636	MT	-124,636
		Feldspar			242		-242
		Silica			4,802		-4,802
		Clay			10,975	MT	-10,975
		Gypsum			325	MT	-325
		Marble (Decorative)			5,280		-5,280
17	MYANMAR PONGPIPAT COMPANY LIMITED	Tin Concentrates	250,119	Kg	233	MT	249,886
18	NGWE YI PALE MINING COMPANY LIMITED	Coal	0		64,680	MT	-64,680
		Bauxite			2,075	MT	-2,075
		Lime Stone			591,644	MT	-591,644
		Gypsum			6,212	MT	-6,212
19	NEW DAYS ASIA MINING COMPANY LIMITED	Lead Ore	17,454	MT	17,454	MT	0
20	HTOO INTERNATIONAL INDUSTRY GROUP COMPANY LIMITED	Coal	30,400	MT	30,400	MT	0
21	HARBOR STAR MINING COMPANY LIMITED	Lead	3,300,000	Kg	3,300	MT	3,296,700
22	MANDALAY GOLDEN FRIEND MINING CO., LTD.	Coal	1,462,500,000		35,000	MT	1,462,465,000
23	MYANMAR GOLDEN POINT FAMILY CO., LTD.	Gold	585	T.oz	238.44	Toz	346.56
24	THAN TAW MYAT COMPANY LIMITED	Lime Stone	1,397,967	Ton	1,397,967	MT	0



N°	Company	Mineral Type	Company		Government		Differences
			Volume	Unit	Volume	Volume-Unit	Volume
25	TUN THWIN MINING COMPANY LIMITED	Coal			28,340	MT	-28,340
26	MANDALAY DISTRIBUTION & MINING COMPANY LIMITED	Coal	0		29,428	MT	-29,428
27	YCDC	Coal	24,999	MT	25,000	MT	-1
28	SAN LIN INTERNATIONAL EXPORT & IMPORT COMPANY LIMITED	Zinc Ore			320	MT	-320
		Iron Ore			950	MT	-950
29	KAN PWINT OO MINING COMPANY LIMITED	Coal	30,650	Ton	26,250	MT	4,400
30	TOP TEN STAR PRODUCTION CO., LTD.	Lead Ore	0		4,810	MT	-4,810
		Lead Concentrate			1,570	MT	-1,570
31	HEAY HEIN COMPANY LIMITED	Coal	72,000	ton	62,400		9,600
32	NGWE KABAR MYANMAR COMPANY LIMITED	Tin	80	MT	80	MT	0
33	MYAUK KYUN THU MA MA MINING & REFINERY COMPANY LIMITED	Gold for (8) Sites	384	Tickle	321.30		62.7
34	XIE SHAN MINING PRODUCTION & MARKETING COMPANY LIMITED	Lead Ore	800	MT	800	MT	0
35	DRAGON CEMENT COMPANY LIMITED	Coal	21,271	Tons	21,271	MT	0
		Limestone	250,800	Tons	250,800	MT	0
36	PRINCE MANUFACTURING COMPANY LIMITED	Zinc Ore			4,000	MT	-4,000
		Lead Carbonate	742,000	Kg			742,000
		Lead Ores	1,300,000	Kg	1,150	MT	1,298,850
37	HTAT YEE LINN MINING & REFINERY COMPANY LIMITED	Gold for (7) sites	336	Tickle	212.10		123.9
38	MYAY NAGAR MINING COMPANY LIMITED	Zinc Ore	4,440	MT	4,440	MT	0
39	THA BYU MINING COMPANY LIMITED	Antimony Concentrate			120	MT	-120
40	YE HTUT KYAW MINING COMPANY LIMITED	Tin Tungsten	30	MT	30	MT	0
41	Myanmar Tin-Tungsten Company Limited	Tin	17	Ton	17	MT	0
42	Myanmar Yang Tse Copper Ltd	Cathode Copper	53,974	MT			53,974
43	Eden Energy & Natural Resources Development Co., Ltd	Barite			878		-878
44	Kanbawza Industries Ltd	Lime Stone			321,847	MT	-321,847
		Gypsum			1,850	MT	-1,850
45	MYANMAR WANBAO MINING COPPER LTD	Cathode Copper	70,756	MT	70,756	MT	0
46	HTAR WA YA						0

N°	Company	Mineral Type	Company		Government		Differences
			Volume	Unit	Volume	Volume-Unit	Volume
47	MYANMAR CNMC NICKEL COMPANY LIMITED	FERRONICKEL	61,292	MT	62,367	MT	-1,075
48	24 HOUR MINING & INDUSTRY COMPANY LIMITED	Lime Stone			100,000	MT	-100,000
49	A & A NATURAL RESOURCES DEVELOPMENT CO., LTD		0				0
50	ASIA PHYO MINING COMPANY LIMITED	Coal	500	Tons			500
		Limestone	18,000	Tons	18,300	MT	-300
51	BLUE DIAMOND CEMENT COMPANY LIMITED	Limestone	108,000,000	Kg	108,000	MT	107,892,000
52	DAGON MINING COMPANY LIMITED	Coal	4,300	Tons			4,300
53	DIAMOND SHARK MINING COMPANY LIMITED	tin & tungsten	16	tans			16
54	Directorate of Military office of Chief of Defence Industries, Ministry of Defence						0
55	GREEN ASIA COMPANY LIMITED	Line Stone	9,000	Ton	9,000	MT	0
		Coal			30	MT	-30
56	GREEN STRATEGIC MINING COMPANY LIMITED						0
57	GROUP OF FOUR MINING COMPANY LIMITED	coal	15,006		15,006	MT	0
58	HTUT KHAUNG KYAW MINING COMPANY LIMITED	Coal	2,306,000	Kg	2,906	MT	2,303,094
59	JUNE CEMENT INDUSTRY LTD.	Limestone	0		105,000	MT	-105,000
60	LINN PYAE MINING COMPANY LIMITED	Lead	107,500	Kg	108	MT	107,393
61	LOI CHAI NAGAR MINING COMPANY LIMITED	Coal	21,500	Ton	21,500		0
62	MAY FLOWER MINING ENTERPRISES LIMITED	Coal	2,215,000	Kg	0	MT	2,215,000
63	MINING WORLD COMPANY LIMITED	Tin & Tungsten Mixed Concentrate			26	MT	-26
64	MOUNT CHING YING MINING COMPANY LIMITED						0
65	MYANMAR APEX MINING CO., LTD	Coal	9,000	MT	9,000	MT	0
		Lead Ore			1,800	MT	-1,800
66	MYANMAR NAING GROUP MINING COMPANY LTD	Limestone	110,000	Kg	110,000	MT	0
67	MYANMAR SIMCO SONG DA JOINT STOK COMPANY LIMITED		0				0
68	MYINT INVESTMENT GROUP COMPANY LIMITED		0				0
69	No.(3) Heavy Industry. Ministry Of Industry						0

N°	Company	Mineral Type	Company		Government		Differences
			Volume	Unit	Volume	Volume-Unit	Volume
70	SHWE PAUK PAUK MINING COMPANY LIMITED	Coal			1,150	MT	-1,150
71	SHWE PIN LE MINING & INDUSTRY COMPANY LIMITED						0
72	SILVER BRIGHT COMPANY LIMITED	Tin & Tungsten Mixed Concentrate	0		1	MT	-1
73	THE SILVER LION MINING COMPANY LIMITED	Granite	0		330	MT	-330
74	THIHA THANT HEIN MINING COMPANY LIMITED		0				0
75	TRIPLE "A" CEMENT INTERNATIONAL COMPANY LIMITED	Coal			19,548	MT	-19,548
		Bauxite			2,300	MT	-2,300
		Gypsum			2,505	MT	-2,505
		Limestone			71,420	MT	-71,420
76	U E EXPORT IMPORT COMPANY LIMITED	Coal			24,000	MT	-24,000
		Limestone			64,654	MT	-64,654
77	UNITED CEMENT COMPANY LIMITED	Limestone			3,000	MT	-3,000
78	YIG COMPANY LIMITED						0
79	YOUNG INVESTMENT GROUP COMPANY LIMITED	Limestone	28,000	MT	28,000	MT	0
		Coal	1,200	MT	1,200	MT	0
80	SEA SUN STAR MINING PRODUCTION & MARKETING COMPANY LIMITED				1,000	MT	-1,000
81	ZABU TALU MINING COMPANY LIMITED	Copper Ore	1,380	MT	1,380		0
82	RUBY DRAGON MINING COMPANY LIMITED	Gypsum	3,500	MT	3,300	MT	200
		Gold	288	Tical	155.4		132.6
		Antimony (raw material)	1,255	MT	735	MT	520
		Antimony (finished product)	38	MT			38
							0
83	HTAY FAMILY COMPANY LIMITED						0
84	SEIN CHI LIN MINING CO., LTD.	Coal	8,998	MT	8,998		0
85	AUNG HTUN LINN SHEIN WIN MINING & REFINERY COMPANY LIMITED	Gold for (4) Sites	192	Tickle	119.70		72.3
86	Future Mining Co.,Ltd						0
87	Future Engineering Gold Mining	Gold	48	tickles	54.60		(6.6)
88	SHWE MYINT THAUNG YINN INDUSTRY & MANUFACTURING COMPANY LIMITED	Gypsum			76	MT	-76

N°	Company	Mineral Type	Company		Government		Differences	
			Volume	Unit	Volume	Volume-Unit	Volume	Volume
89	MYANMAOR MYO KO KO MEDICAL INSTRUMENT COMPANY LIMITED							0
90	SAT WINE INN ARR MINING COMPANY LIMITED	Lead Ore			1,430	MT		-1,430
91	SHWE SAPAR MINING COMPANY LIMITED	Lead Ore	0		600	MT		-600
92	NAN KANAUNG MINING & ENGINEERING COMPANY LIMITED	Manganese Dioxide			1,870			-1,870
93	NEW ERA GOLD COMPANY LIMITED	Marble (Decorative)	0		670			-670
94	SHWE PYI NAGAR COMPANY LIMITED							

**(b) Other Minerals Exports**

The table below shows the differences between the exportation reported by the other mineral's companies and MONREC:

**Table 150 : Other minerals exports reconciliation**

N°	Company	Company			Government					Differences	
		Mineral Type	Volume	Value	Mineral Type	Volume	Volume-Unit	Value	Currency	Volume	Value
1	National Prosperity Gold Production Group Limited										
2	MYANMAR ECONOMIC CORPORATION LIMITED	Marble Stone	1,267	687,340	Marble (Decorative)	1,267	MT	687,340	US\$	0	0
3	GEO ASIA INDUSTRY & MINING COMPANY LIMITED									0	0
4	CORNERSTONE RESOURCES (MYANMAR) LTD.	Zinc Ingot	9,818	27,463,837	Zinc Ingot	9,818	MT	27,463,837	US\$	0	0
5	ETERNAL MINING COMPANY LIMITED									0	0
6	MYANMA ECONOMIC HOLDINGS PUBLIC COMPANY LIMITED									0	0
7	KAYAH STATE MINERAL PRODUCTION COMPANY LIMITED									0	0
8	SHWE MOE YAN COMPANY LIMITED				Lead Ore	700	MT	75,900	US\$	-700	-75,900
9	GPS JOINT VENTURE COMPANY LIMITED	Lead	1,000	542,800	Lead Concentrate	1,000	MT	523,400	US\$	0	19,400
10	SHWE TAUNG MINING COMPANY LIMITED				Lead Ore	500	MT	71,000	US\$	-500	-71,000
11	DELCO LIMITED	Tin & Tungsten	91,179	521,459,655						91,179	521,459,655
12	MAX (MYANMAR) COMPANY LIMITED									0	0
13	FIRST RESOURCES COMPANY LIMITED									0	0
14	PACIFIC LINK CEMENT INDUSTRIES LIMITED									0	0

N°	Company	Company			Government					Differences	
		Mineral Type	Volume	Value	Mineral Type	Volume	Volume-Unit	Value	Currency	Volume	Value
15	WIN MYINT MO INDUSTRIES COMPANY LIMITED	Lead Concentrate	500	241,020,375						500	241,020,375
		Zinc Concentrate	1,500	814,890,331						1,500	814,890,331
16	No. (2)Heavy Industry, Ministry of Industry									0	0
17	MYANMAR PONGPIPAT COMPANY LIMITED	Tin Concentrates	146	1,127,303						146	1,127,303
18	NGWE YI PALE MINING COMPANY LIMITED									0	0
19	NEW DAYS ASIA MINING COMPANY LIMITED	Lead Ore	5,143	531,473	Lead Ore	8,000	MT	922,000	US\$	-2,857	-390,527
20	HTOO INTERNATIONAL INDUSTRY GROUP COMPANY LIMITED									0	0
21	HARBOR STAR MINING COMPANY LIMITED	Lead	2,800	795,300	Lead Ore	2,800	MT	975,300	US\$	0	-180,000
22	MANDALAY GOLDEN FRIEND MINING CO., LTD.									0	0
23	MYANMAR GOLDEN POINT FAMILY CO., LTD.									0	0
24	THAN TAW MYAT COMPANY LIMITED									0	0
25	TUN THWIN MINING COMPANY LIMITED									0	0
26	MANDALAY DISTRIBUTION & MINING COMPANY LIMITED									0	0
27	YCDC									0	0
28	SAN LIN INTERNATIONAL EXPORT & IMPORT COMPANY LIMITED				Zinc Ore	2,225	MT	210,885	US\$	-2,225	-210,885
					Iron Ore	10,830	MT	486,070	US\$		
29	KAN PWINT OO MINING COMPANY LIMITED									0	0
30	TOP TEN STAR PRODUCTION CO., LTD.				Lead Ore	2,793	MT	465,248	US\$	-2,793	-465,248
					Lead Concentrate	1,522	MT	604,562	US\$		
31	HEAY HEIN COMPANY LIMITED									0	0
32	NGWE KABAR MYANMAR COMPANY LIMITED	Tin	35	261,604						35	261,604
33	MYAUK KYUN THU MA MA MINING & REFINERY COMPANY LIMITED									0	0
34	XIE SHAN MINING PRODUCTION & MARKETING COMPANY LIMITED	Lead Ore	4,085	459,735	Lead Ore	4,440	MT	467,780	US\$	-355	-8,045
35	DRAGON CEMENT COMPANY LIMITED	use their production by them self								0	0
36	PRINCE MANUFACTURING COMPANY LIMITED	Lead Carbonate	742,000	197,813,429						742,000	197,813,429
					Zinc Ore	1,300	MT	191,100	US\$		

N <sup>o</sup>	Company	Company			Government					Differences	
		Mineral Type	Volume	Value	Mineral Type	Volume	Volume-Unit	Value	Currency	Volume	Value
		Lead Ores	1,300	260,227,633	Lead Ore	750	MT	147,250	US\$	550	260,080,383
37	HTAT YEE LINN MINING & REFINERY COMPANY LIMITED									0	0
38	MYAY NAGAR MINING COMPANY LIMITED	Lead Zinc Ore	2,870	406,810	Zinc Ore	2,870	MT	406,810	US\$	0	0
39	THA BYU MINING COMPANY LIMITED				Antimony Concentrate	330	MT	340,380	US\$		
40	YE HTUT KYAW MINING COMPANY LIMITED										
41	Myanmar Tin-Tungsten Company Limited										
42	Myanmar Yang Tse Copper Ltd	Cathode Copper	47,791	293,244,041	Cathode Copper	42,600	MT			5,191	
43	Eden Energy & Natural Resources Development Co., Ltd										
44	Kanbawza Industries Ltd										
45	MYANMAR WANBAO MINING COPPER LTD	Cathode Copper	52,891	326,185,247	Cathode Copper	52,800	MT			91	
46	HTAR WA YA										
47	MYANMAR CNMC NICKEL COMPANY LIMITED	FERRO NICKEL	80,527	291,958,249	FERRO NICKEL	83 748	MT	853,979,354	US\$	3,221	562 021 105
48	24 HOUR MINING & INDUSTRY COMPANY LIMITED										
49	A & A NATURAL RESOURCES DEVELOPMENT CO., LTD	Tin Concentrate	9,729	171,742,954							
50	ASIA PHYO MINING COMPANY LIMITED										
51	BLUE DIAMOND CEMENT COMPANY LIMITED										
52	DAGON MINING COMPANY LIMITED										
53	DIAMOND SHARK MINING COMPANY LIMITED										
54	Directorate of Military office of Chief of Defence Industries, Ministry of Defence										
55	GREEN ASIA COMPANY LIMITED										
56	GREEN STRATEGIC MINING COMPANY LIMITED										
57	GROUP OF FOUR MINING COMPANY LIMITED										
58	HTUT KHAUNG KYAW MINING COMPANY LIMITED										
59	JUNE CEMENT INDUSTRY LTD.										
60	LINN PYAE MINING COMPANY LIMITED				Lead Concentrate	112	MT	56,000	US\$		

N o.	Company	Company			Government					Differences	
		Mineral Type	Volume	Value	Mineral Type	Volume	Volume-Unit	Value	Currency	Volume	Value
61	LOI CHAI NAGAR MINING COMPANY LIMITED										
62	MAY FLOWER MINING ENTERPRISES LIMITED	Coal	2,215,000	79,740,000							
63	MINING WORLD COMPANY LIMITED										
64	MOUNT CHING YING MINING COMPANY LIMITED										
65	MYANMAR APEX MINING CO., LTD	Zinc Oxide	13,400	171,487,400							
66	MYANMAR NAING GROUP MINING COMPANY LTD										
67	MYANMAR SIMCO SONG DA JOINT STOK COMPANY LIMITED				Marble	22	MT	3,614	US\$		
68	MYINT INVESTMENT GROUP COMPANY LIMITED										
69	No.(3) Heavy Industry. Ministry Of Industry										
70	SHWE PAUK PAUK MINING COMPANY LIMITED										
71	SHWE PIN LE MINING & INDUSTRY COMPANY LIMITED										
72	SILVER BRIGHT COMPANY LIMITED										
73	THE SILVER LION MINING COMPANY LIMITED										
74	THIHA THANT HEIN MINING COMPANY LIMITED										
75	TRIPLE "A" CEMENT INTERNATIONAL COMPANY LIMITED										
76	U E EXPORT IMPORT COMPANY LIMITED										
77	UNITED CEMENT COMPANY LIMITED										
78	YIG COMPANY LIMITED										
79	YOUNG INVESTMENT GROUP COMPANY LIMITED										
80	SEA SUN STAR MINING PRODUCTION & MARKETING COMPANY LIMITED										
81	ZABU TALU MINING COMPANY LIMITED										
82	RUBY DRAGON MINING COMPANY LIMITED										
83	HTAY FAMILY COMPANY LIMITED										
84	SEIN CHI LIN MINING CO., LTD.										
85	AUNG HTUN LINN SHEIN WIN MINING & REFINERY COMPANY LIMITED										

N °	Company	Company			Government				Differences		
		Mineral Type	Volum e	Value	Mineral Type	Volum e	Volume- Unit	Value	Curren cy	Volume	Value
86	Future Mining Co.,Ltd										
87	Future Engineering Gold Mining										
88	SHWE MYINT THAUNG YINN INDUSTRY & MANUFACTURING COMPANY LIMITED										
89	MYANMAR MYO KO KO MEDICAL INSTRUMENT COMPANY LIMITED										
90	SAT WINE INN ARR MINING COMPANY LIMITED				Lead Ore	1,500	MT	108,000	US\$		
91	SHWE SAPAR MINING COMPANY LIMITED										
92	NAN KANAUNG MINING & ENGINEERING COMPANY LIMITED										
93	NEW ERA GOLD COMPANY LIMITED										
94	SHWE PYI NAGAR COMPANY LIMITED										



## 5.7.4. Pearl sector

### (a) Pearl Production

The table below shows the differences between the production reported by pearl companies and MPE.

Table 151 : Pearl production reconciliation

N°	Company name	Company		SOE		Difference	
		Quantity produced in momme	Value in USD	Quantity produced in momme	Value in USD	Quantity produced in momme	Value in USD
1	Myanmar Tasaki Co., Ltd	160,702	8,066,826			160,702	8,066,826
2	Myanmar Atlantic Co., Ltd	34,951	1,128,414			34,951	1,128,414
3	Myanmar Andman Co., Ltd	47,231	2,296,571			47,231	2,296,571
4	Belpearl Myanmar Co., Ltd	7,413	268,592			7,413	268,592
5	Nino Pearl Culturing Co., Ltd	27,477				27,477	-
6	Orient Pearl Co., Ltd (Zinyaw)	67,880	3,270,027			67,880	3,270,027
7	Orient Pearl Co., Ltd (Jalan)	14,811	759,960			14,811	759,960
8	Annawar Pearl Co., Ltd (Marine Pearl Company)	-				-	-
9	Pyae Sone Htet Myint Co., Ltd	-				-	-
10	Aquagold Myanmar Co., Ltd	-				-	-
11	Pyae Phyo Tun Co., Ltd	-				-	-
Total		360,466	15,790,390	443,137	19,431,352	(82,671)	(3,640,962)

We have not been able to reconcile the pearl production as the information reported by the MPE wasn't presented by company.

### (b) Pearl exports

The table below shows the differences between the sales and exports reported by pearl companies and MPE :

Table 152 : Pearl exports reconciliation

N°	Company name	Company		SOE		Difference	
		Quantity exported in momme	Value in USD	Quantity exported in momme	Value in USD	Quantity exported in momme	Value in USD
1	Myanmar Tasaki Co., Ltd	120,526	6,050,115			120,526	6,050,115
2	Myanmar Atlantic Co., Ltd	20,525	1,230,849			20,525	1,230,849
3	Myanmar Andman Co., Ltd	nc				na	-
4	Belpearl Myanmar Co., Ltd	5,560	201,446			5,560	201,446
5	Nino Pearl Culturing Co., Ltd	24,796	1,110,273			24,796	1,110,273
6	Orient Pearl Co., Ltd (Zinyaw)	67,880	3,270,027			67,880	3,270,027
7	Orient Pearl Co., Ltd (Jalan)	14,811	759,960			14,811	759,960
8	Annawar Pearl Co., Ltd (Marine Pearl Company)	-				-	-
9	Pyae Sone Htet Myint Co., Ltd	-				-	-
10	Aquagold Myanmar Co., Ltd	-				-	-
11	Pyae Phyo Tun Co., Ltd	-				-	-
Total		254,098	12,622,670	46,673	7,617,692	207,425	5,004,979

We have not been able to reconcile the pearl exports as the information reported by the MPE wasn't presented by company.

**(c) Pearl local sales**

The table below shows the differences between the local sales reported by pearl companies and MPE :

**Table 152 : Pearl local sales reconciliation**

N°	Company name	Company		SOE		Difference	
		Quantity sold in momme	Value in USD	Quantity sold in mome	Value in USD	Quantity sold in momme	Value in USD
1	Myanmar Tasaki Co., Ltd					-	-
2	Myanmar Atlantic Co., Ltd	6,699	80,896			6,699	80,896
3	Myanmar Andman Co., Ltd					-	-
4	Belpearl Myanmar Co., Ltd					-	-
5	Nino Pearl Culturing Co., Ltd					-	-
6	Orient Pearl Co., Ltd (Zinyaw)					-	-
7	Orient Pearl Co., Ltd (Jalan)					-	-
8	Annawar Pearl Co., Ltd (Marine Pearl Company)					-	-
9	Pyae Sone Htet Myint Co., Ltd					-	-
10	Aquagold Myanmar Co., Ltd					-	-
11	Pyae Phyo Tun Co., Ltd					-	-
<b>Total</b>		<b>6,699</b>	<b>80,896</b>	<b>63,940</b>	<b>2,229,725</b>	<b>(57,241)</b>	<b>(2,148,829)</b>

## 6. OTHER INFORMATION

### 6.1. Production and exports/Sold declared by SOEs

SOEs were asked to report production for the Fiscal Year 2017-2018. Aggregated figures as declared by SOE's are detailed in the table below:

Sector	Production (In million MMK)	Export/Sold (In million MMK)
Oil & Gas	98,326	4,210,099
Gems & Jade	119,674	2,528,282
Other minerals	398,199	25,090
Pearls	26,345	10,328
<b>Extractive Sector</b>	<b>642,544</b>	<b>6,748,709</b>

### 6.2. Government receipts from companies not selected in the reconciliation scope

According to MSG's decisions, SOEs were required to disclose aggregated revenues received from extractive companies not selected in the reconciliation scope. Unilateral revenues received by Government Agencies amounted to MMK 66,908,329,027 and are summarised as follows:

Table 153 : Unilateral disclosure

Revenues	Amount in MMK
<b>DoM</b>	<b>1,499,034,117</b>
Royalties	890,140,631
Dead Rent Fees	541,379,486
Licence Fees	67,514,000
<b>Custom Department</b>	<b>604,935,287</b>
Customs Duties	604,935,287
<b>IRD</b>	<b>2,698,039,440</b>
Commercial Tax	1,656,542,945
Corporate Income Tax	835,253,659
Specific Goods Tax IRD	181,365,843
Withholding Tax	24,876,993
<b>Sub-total (Other minerals)</b>	<b>4,802,008,844</b>
<b>MGE</b>	<b>49,736,725,277</b>
Commercial Tax - 5% (EURO Sales)	157,050,455
Specific Goods Tax - Jade 20%, Gems 15%, 5 % Value added for finish goods	37,418,076,365
Sale Split	3,002,371,965
Service Fees Euro Sales - Raw Materials 3%, Added Value 1%	8,484,804,822
Incentive fees 1%, 2%	124,424,417
Incentive fees 1%, 2%(Penalty)	20,749,555
Penalties for cancelled sales	386,003,581
Penalties for cancelled sales(Emporium Central Committee)	143,244,117
<b>Custom Department</b>	<b>424,622,051</b>
Customs Duties	424,622,051
<b>IRD</b>	<b>11,944,972,855</b>
Commercial Tax	494,939,685
Corporate income Tax	1,745,286,697
Specific Goods Tax IRD	9,664,350,601

Revenues	Amount in MMK
Capital Gains Tax	40,087,842
Withholding Tax	119,946
Stamp Duties	188,084
Sub-total (Gems& Jade)	62,106,320,183
Total unilateral disclosure	66,908,329,027

### 6.3. Oil & gas transportation volume and tariff

The volume transported by each Oil & Gas transportation company and the average tariff applied in the FY 2017-2018 are as follows:

Table 154 : Oil and Gas transportation tariff

Company	Project	Quantity	Unit	Unit Tariff in USD	Total
(SEAGP)	Shwe	168,730	MSCF	2,382.41	401,984,959
(SEAOP)	Shwe	1,465,006	MTS	31.56	46,235,588
(ATL)	Zawtika	100,723,196	MMBTU	2.65	267,266,012
(MGTC)	Yadana	211,205	\$/Mscf	1,921.83	405,899,445
(TPC)	Yetagun	70,664,326	MMBTU	2.46	173,789,864
Total					1,295,175,867

### 6.4. Revenues in kind collected by the SOEs

Reporting entities were requested to report contributions in kind made to or received by Government or State-Owned Entities. An in-kind flow is where the Government receives minerals, crude oil or natural gas instead of cash, and monetises the physical commodity in some way. SOEs were also requested to report quantities and revenues received from the sale of the State's production share.

#### In kind flows

In kind flow as reported by SOE detailed by commodity for the fiscal period 2017/18 are set out in the table below:

Table 155 : Revenue in kind collected by the MOGE

SOE	Commodity	Quantity	Unit
MOGE onshore blocks	Oil in kind revenue	1,085,709	in barrels
	Gas in kind revenue	707	in Mscf
MGE	Jade	59,092	kg
ME (1)	Cathode Copper	10,812	MT
	Ferro Nickel	1,601	MT
ME (2)	Gold	11,061.860	oz-T
	Tin, Tungsten & Mixed Ore	431.605	MT
MPE	Pearl	62,572	Momme

## Revenues from sales

### MOGE

According to the information received from the MOGE, the detail of in-kind payments detailed by payment flows is presented as below:

**Table 156: Revenue in kind collected by the MOGE detailed by payment flow**

Type of in-kind payment	Oil collection in barrels	Gas collection in Mscf
Baseline payments	613,272	616.850
Cost recovery	316,992	61.138
State profit share	73,585	
Royalties payments	43,451	
Risk compensation	38,409	28.865
<b>Total</b>	<b>1,085,709</b>	<b>706.853</b>

The detail of in-kind payments sales will be presented separately in the commodity trading report related to the Oil and gas downstream sector.

### MGE

According to MGE data, the following companies are in kind sharing on production in financial year 2017-2018.

Sr.	Company Name	State Own	
		Weight	Value
		(Kilo)	(Million Kyats)
1	Wai Aung Kaba Company	1,292	4,860,900
2	Ayar Jade Company	57,800	5,800,000
<b>Total</b>		<b>59,092</b>	<b>10,660,900</b>

The rough jade received from the in-kind allocation of production sharing is recorded in the state ledger, transformed to finished goods then displayed in the gems museum at Yangon or Naypyidaw. There is no sale from the in-kind received during the financial year 2017-2018.

### ME 1

The royalties in kind received by ME (1). totalised 53,973.79 Tons of Copper. However, the document received from DOM didn't mention the value of the royalties in kind received.

### ME 2

Sales of State's share of production operated by ME (2) amounted to MMK 15,271.03 and is detailed, by Commodity below:

**Table 157: Sales of the state share**

Minerals	Qty	Unit	Amount (in million MMK)
Gold	7,191.55	Tical	6,582.09
Tin, Tungsten & Mixed Ore	479.76	MT	5,154.74
Pyro Refined Tin	1.47	MT	39.56
Tin, Tungsten & Mixed Ore	240.56	MT	3,494.63
<b>Total</b>			<b>15,271.03</b>

The detail of these sales by individual buying entity is as follows:

## Gold

No.	Buyers	Date	Payment Voucher	Type of Product	Volume	Unit	Value (in MMK)
1	Ministry of Home Affairs	06/01/2017	R-045	Gold	157.42	Tical	135,830,972
2	Central Bank	01/03/2018	R-162	Gold	6,896.14	Tical	6,316,866,857
3	Ministry of Religious Affairs and culture	01/08/2018	R-164	Gold	106.03	Tical	99,350,110
4	Ministry of Military	22/03/2018	R-219	Gold	31.96	Tical	30,042,400
Total					7,191.55		6,582,090,339

## Refined Tin

No.	Buyers	Date	Payment Voucher	Type of Product	Volume	Unit	Value (in MMK)
1	Myanmar Golden Bonaza Co.,ltd	05/11/2017	R-001	Tin-Tungsten Scheelite (Mixed)	57.91	MT	381,488,795
2	Myanmar Golden Bonaza Co.,ltd	05/11/2017	R-001	Tin-Tungsten Scheelite (Mixed)	42.67	MT	277,345,487
3	Ruili Yujie Imp & Exp Co.,ltd	09/05/2017	R-002	Tin-Tungsten(Mixed)	15.55	MT	198,727,144
4	China Sonic Technology Co.,ltd	09/11/2017	R-003	Tin-Tungsten(Mixed)	24.68	MT	387,007,498
5	China Sonic Technology Co.,ltd	27/10/2017	R-008	Tin-Tungsten(Mixed)	86.70	MT	1,304,690,462
6	China Sonic Technology Co.,ltd				13.61	MT	158,157,211
7	Myanmar Crate Promote Refined Mining Co.,ltd	14/09/2017	R-004	Tungsten Concentrates	1.40	MT	14,606,070
8	Credera Global (Singapore)PTE ltd	15/09/2017	R-005	Tungsten Concentrates	2.56	MT	38,441,566
9	Credera Global (Singapore)PTE ltd	15/09/2017	R-005	Tungsten Concentrates	0.41	MT	5,850,775
10	Pyae Phyo Kywe Mining Co.,ltd	23/10/2017	R-006	Tin	3.80	MT	33,806,312
11	E & N PTE ltd	23/10/2017	R-007	Tin-Tungsten(Mixed)	79.07	MT	1,164,238,234
12	E & N PTE ltd	23/10/2017	R-007	Tin-Tungsten(Mixed)	78.10	MT	1,072,288,948
13	Asia Tungsten Products Vietnam Co.,ltd	14/03/2018	R-009	Tin-Tungsten(Mixed)	49.30	MT	772,135,878
14	Asia Tungsten Products Vietnam Co.,ltd	14/03/2018	R-009	Tin-Tungsten(Mixed)	31.50	MT	495,519,199
15	Asia Future PTE.ltd	14/03/2018	R-010	Tin	25.82	MT	454,013,469
16	Asia Future PTE.ltd	14/03/2018	R-010	Tin	17.72	MT	309,197,967
17	Ruili City Yunmachang Imp & Exp Co.,ltd	14/03/2018	R-011	Tin-Tungsten Scheelite (Mixed)	4.86	MT	72,313,952
18	Ruili City Yunmachang Imp & Exp Co.,ltd	14/03/2018	R-011	Tin-Tungsten Scheelite (Mixed)	111.37	MT	1,391,453,748
19		08/02/2017	R-082	Pyro Refined Tin	1.47	MT	39,561,960
20	Myanmar Golden Bonaza Co.,ltd	05/11/2017	R-003	Tin-Tungsten Scheelite (Mixed)	11.71	MT	60,469,404
21	China Sonic Technology Co.,ltd	27/10/2017	R-012	Tin-Tungsten(Mixed)	61.58	MT	57,621,395
Total					721.79		8,688,935,473

## 6.5. Social Expenditures and Infrastructure Provisions

Companies were requested to disclose social expenditure incurred and infrastructure provisions. Amounts reported are shown in the table below. These amounts were declared unilaterally by the companies and were not included in the reconciliation flows.

**Table 158 : Social payments detailed by company**

No.	Company	Mandatory Corporate Social Responsibility	Voluntary Corporate Social Responsibility	Total (In MMK)
<b>Oil and Gas</b>		<b>362,400</b>	<b>5,946,521,610</b>	<b>5,946,884,010</b>
1	Gold Petrol Joint Operating Company Inc., (GJOC Inc.)	-	115,000,000	115,000,000
2	MPRL E&P Pte Ltd. (Yangon Branch )	-	732,673,540	732,673,540
3	PC Myanmar (Hong Kong) Limited	-	383,320,229	383,320,229
4	Posco Daewoo Corporation (Myanmar E&P Office)	-	2,121,684,982	2,121,684,982
5	PTTEP International Ltd.	-	745,791,543	745,791,543
6	Unocal Myanmar Offshore Co., Ltd.	-	847,624,314	847,624,314
7	Pacific Hunt Energy Corporation (Myanmar Branch)	-	100,826,611	100,826,611
8	Shell Myanmar Energy Pte. Ltd. - Yangon Branch	362,400	-	362,400
9	Woodside Energy (Myanmar) Pte Ltd	-	874,393,739	874,393,739
10	Young Investment Group Co. Ltd.	-	25,206,652	25,206,652
<b>Oil and Gas transportation</b>		<b>-</b>	<b>4,561,083,390</b>	<b>4,561,083,390</b>
1	(SEAGP)		635,821,809	635,821,809
2	(SEAOP)		461,709,343	461,709,343
3	(ATL)		-	-
4	(MGTC)		3,372,498,304	3,372,498,304
5	(TPC)		91,053,934	91,053,934
<b>Gems and Jade</b>		<b>-</b>	<b>380,820,000</b>	<b>380,820,000</b>
1	Northern Jade World		10,000,000	10,000,000
2	Yadanar Si		2,050,000	2,050,000
3	Aung Hlaing Kyawlwa		2,700,000	2,700,000
4	Seine Aung		13,000,000	13,000,000
5	Myint Shin Gems Co., LTd		3,000,000	3,000,000
6	Myanmar Rich Land Gems		12,900,000	12,900,000
7	Kan Sein Pwint		2,000,000	2,000,000
8	Moe Brothers		263,000,000	263,000,000
9	MOGOK PRIDE		37,200,000	37,200,000
10	Myanmar Lar Ba Gems Co., Ltd.		570,000	570,000
11	METAL METERO		2,900,000	2,900,000
12	KYAN FAMILY		1,500,000	1,500,000
13	HTAY PAING		30,000,000	30,000,000
<b>Other Minerals</b>		<b>994,040,220</b>	<b>7,700,709,885</b>	<b>8,694,750,105</b>
1	NATIONAL PROSPERITY COMPANY LIMITED	-	3,211,784,630	3,211,784,630
2	GEO ASIA INDUSTRY & MINING COMPANY LIMITED	-	416,006,890	416,006,890
3	ETERNAL MINING COMPANY LIMITED	-	236,614,975	236,614,975
4	MYANMA ECONOMIC HOLDINGS PUBLIC COMPANY LIMITED	676,261,120	27,350,000	703,611,120
5	DELCO LIMITED	-	39,657,000	39,657,000
6	MAX (MYANMAR) COMPANY LIMITED	-	23,096,000	23,096,000
7	WIN MYINT MO INDUSTRIES COMPANY LIMITED	-	46,561,247	46,561,247

No.	Company	Mandatory Corporate Social Responsibility	Voluntary Corporate Social Responsibility	Total (In MMK)
8	MYANMAR PONGPIPAT COMPANY LIMITED	-	21,500,000	21,500,000
9	HTOO INTERNATIONAL INDUSTRY GROUP COMPANY LIMITED	-	6,658,500	6,658,500
10	HARBOR STAR MINING COMPANY LIMITED	-	18,400,000	18,400,000
11	MYANMAR GOLDEN POINT FAMILY CO., LTD.	-	1,163,913,675	1,163,913,675
12	THAN TAW MYAT COMPANY LIMITED	300,000,000	94,775,000	394,775,000
13	HEAY HEIN COMPANY LIMITED	11,000,000	106,300,000	117,300,000
14	NGWE KABAR MYANMAR COMPANY LIMITED	-	58,462,500	58,462,500
15	MYAY NAGAR MINING COMPANY LIMITED	-	3,000,000	3,000,000
16	YE HTUT KYAW MINING COMPANY LIMITED	-	101,587,400	101,587,400
17	MYANMAR TIN -TUNGSTEN COMPANY LIMITED	-	6,000,000	6,000,000
18	Myanmar Yang Tse Copper Ltd	-	706,302,441	706,302,441
19	Eden Energy & Natural Resources Development Co., Ltd	-	25,298,295	25,298,295
20	MYANMAR WANBAO MINING COPPER LTD	-	867,054,152	867,054,152
21	MYANMAR CNMC NICKEL COMPANY LIMITED	-	298,445,270	298,445,270
22	24 HOUR MINING & INDUSTRY COMPANY LIMITED	6,779,100	-	6,779,100
23	BLUE DIAMOND CEMENT COMPANY LIMITED	-	14,740,000	14,740,000
24	DIAMOND SHARK MINING COMPANY LIMITED	-	2,810,000	2,810,000
25	GROUP OF FOUR MINING COMPANY LIMITED	-	6,250,000	6,250,000
26	LOI CHAI NAGAR MINING COMPANY LIMITED	-	10,000,000	10,000,000
27	MYANMAR APEX MINING CO., LTD	-	65,341,310	65,341,310
28	MYANMAR NAING GROUP MINING COMPANY LTD	-	12,000,000	12,000,000
29	SHWE PIN LE MINING & INDUSTRY COMPANY LIMITED	-	7,170,000	7,170,000
30	TRIPLE "A" CEMENT INTERNATIONAL COMPANY LIMITED	-	67,480,600	67,480,600
31	SEIN CHI LIN MINING CO., LTD.	-	33,150,000	33,150,000
32	NAN KANAUNG MINING & ENGINEERING COMPANY LIMITED	-	3,000,000	3,000,000
<b>Pearl</b>		<b>29,310,000</b>	<b>615,084,831</b>	<b>644,394,831</b>
1	Myanmar Tasaki Co., Ltd	-	4,753,800	4,753,800
2	Myanmar Atlantic Co., Ltd	-	19,694,721	19,694,721
3	Myanmar Andman Co., Ltd	29,310,000	557,500,000	586,810,000
4	Belpearl Myanmar Co., Ltd	-	2,500,000	2,500,000
5	Nino Pearl Culturing Co., Ltd	-	24,263,560	24,263,560
6	Annawar Pearl Co., Ltd (Marine Pearl Company)	-	3,030,000	3,030,000
7	Aquagold Myanmar Co., Ltd	-	3,342,750	3,342,750
<b>Total</b>		<b>1,023,712,620</b>	<b>19,204,219,716</b>	<b>20,227,932,336</b>

MOGE reported a total social payment of 3,408,047,844. The breakdown of the social payments by beneficiary and by project is presented in the Annex 11 and 9 and 10 of the report.



## 6.6. Contribution to the Myanmar economy

### Extractive sector contribution to the State revenue

The extractive sector accounted for 5.16% to the country's revenues during in the FY 2017/2018. The table below shows the breakdown of Myanmar's revenues by tax.

**Table 159 : Extractive sector contribution to the State revenue**

Revenue per Sector	2017-2018	Contribution in %
Taxes on Extraction Petroleum and Natural Gas	352,874.4	4.75%
Revenues of Transportation of Oil and Gas Sector	-	-
Minerals Tax and Treasure Tax	30,386.1	0.41%
Taxes on Extraction of Mineral Produce	69.8	0.00%
<b>Extractive Sector Revenue</b>	<b>383,330.3</b>	<b>5.16%</b>
<b>Total Taxes and Duties</b>	<b>7,423,519.6</b>	

Source: Central Statistical Organization, 2018 Myanmar Statistical Yearbook

### Extractive sector contribution to GDP

The extractive sector accounted for approximately 4.78% to the country's GDP during FY 2017/2018.

**Table 160 : Extractive sector contribution to GDP**

GDP per Sectors	2017-2018	Contribution in %
Oil and Gas	3,422,785	3.78%
Mining	902,025	1.00%
<b>Extractive industries</b>	<b>4,324,810</b>	<b>4.78%</b>
<b>Gross Domestic Product of Myanmar</b>	<b>90,450,949</b>	<b>-</b>

Source: Central Statistical Organization, 2018 Myanmar Statistical Yearbook, Table 8.01.

### Extractive sector contribution to the State exports

According to the CSO, the contribution of the extractive sector to the state exports amounted to US\$ 5,271.5 million during the FY 2017/2018.

Extractive sector exports represented 35.5% of total Myanmar export during the FY 2017/2018:

**Table 161 : Extractive sector contribution to the State exports**

Exportations per Sector	2017-2018	Contribution in %
Exports of Gas	3,506.2	23.61%
Exports of Gems and Jade	754	5.08%
Exports of Other minerals	1,002.3	6.75%
Exports of Pearl	8.6	0.06%
<b>Extractive Sector Revenues</b>	<b>5,271.5</b>	<b>35.50%</b>
<b>Total State Exports</b>	<b>14,850.7</b>	

Source: Central Statistical Organization, 2018 Myanmar Statistical Yearbook

### Extractive sector contribution to employment

The entire sector's contribution to employment has not been made available to us. We understand that this information is not available at the level of the SOEs and Oil and Gas and mining departments. According to the collected data from companies, SOEs and Government Agencies, the extractive sector employment representing 0.26% of total Country's 2017-2018 labour force in Myanmar.

**Table 162 : Extractive sector contribution to employment**

Sector	Number of direct domestic employees		Number of direct foreign employees		Total	Contribution in %
	Male	Female	Male	Female		
Oil and Gas Sector	8,855	1,266	114	8	10,243	0.05%
Oil and Gas transportation Sector	672	195	213	36	1,116	0.005%
Pearl Sector	1,043	699	6	-	1,748	0.01%
Gems & Jade Sector	18,218	2,051	155	40	20,464	0.09%
Other Minerals Sector	21,031	2529	-	-	23,560	0.11%
<b>Extractive sector labour force</b>	<b>49,819</b>	<b>6,740</b>	<b>488</b>	<b>84</b>	<b>57,131</b>	<b>0.25%</b>
<b>Total Labour force in Myanmar</b>	<b>22,389,000</b>					

(1) Source: Reporting templates of Oil and Gas and Oil and Gas transportation companies

(2) Source: MPE employment Data for all the Pearl sector

(3) Source: Reporting templates of MGE and Gems and Jade companies in scope

(4) Source: ME1 and ME2 employment Data for the other minerals sector

(5) Source: annual labour force survey published by the Ministry of Labour, Immigration and Population, Department of Labour for the 1st quarter of 2017

## 6.7. Quasi-fiscal expenditures

SOEs falling under the responsibility of MoEE and MONREC were requested to disclose the quasi-fiscal contributions made to Government. According to the information reported by the SOE, these companies did not make any quasi-fiscal expenditures during the reporting period 2017-2018.

## 6.8. Loans and loan guarantees

SOEs and Government Agencies were requested to disclose the loans and loan guarantees provided to extractive companies with the details of these transactions. According to the information reported by the MOGE, the loans contracted are detailed as below:

### Oil and Gas sector:

**Table 163 : Loans contracted by the MOGE**

Amounts in million											
No	Contract No/ Purchase	Agreement Date	Loan	Particulars	Curr ency	Loan Amount	Paid up to 31.3.2018		Balance to be Paid		Lender / Suppliers
							Principal	Interest	Principal	Interest	
1	PBC NO (2007)10,11,12 TOTAL NO. (031),(032), (033)	27.9.07	China Soft Loan	Four Drilling Rigs and Oil Field Equipment and Materials Project	USD in million	80.51	44.28	19.14	36.23	2.75	Export-Import of China / Central Bank of Myanmar
2	18 01 01-00 16 01(MY-C1)	15.1.13	JACA Loan	Offshore Petroleum Exploration Project	J¥ in million	11,629.72	5.84	5.78	11,623.88	23.25	Japan International Cooperation Agency
3	5300942322009591489	20.12.09	CDB (24")	Yadana-Yangon 24" Gas Pipelile Project	Euro in million	185.60	35.92	62.39	149.68	44.54	China Development Bank
4	5300942322010591241	16.12.10	CDB(EURO)	Offshore Natural Gas Development and Pipe line Project/ Onshore Natural Gas Pipe line Project	Euro in milliom	452.75	67.78	114.37	384.97	108.58	China Development Bank (CDB) Loan /Myanma Foreign Trade Bank
5	5300942322010591242	16.12.10	CDB(RMB)	Oil Pipe line Project	RMB in million	7,358.40	913.58	1,516.22	6,444.82	1,463.48	China Development Bank (CDB) Loan /Myanma Foreign Trade Bank

## Other Minerals:

Table 164 : Loan contracted by the ME1

Amounts in million

Beneficiary	Sector	Currency	Total amount of the loan	Date of grant	Terms of the Transaction		
					Repayment period	Interest rate	Outstanding amount on 31/03/2018
I. No (1) Mining Enterprise							
(1) Japan Loan							
(i) Steel Mill Renovation (MY-C1, JICA)	Mining	JPY	4,637	28-12-1982	30 years	1.01%	3,050
Total		JPY	4,637				3,050

We understand that these loans are used to fund projects with robust cash flow for which equity funding through mining contracts was not available. These projects have been funded under this shareholder loan agreements signed between the ME1 and the contractors. These agreements are not made public and therefore the sharing mechanisms remain unclear.

Except as provided above, no loans or guarantees were granted during the fiscal year 2017-18 to the extractive companies including Military Holding Companies.

## **6.9. Infrastructure provisions and barter arrangements**

SOEs and Government Agencies were requested to disclose the Infrastructure provisions and barter arrangements with the companies operating in the extractive sector. According to the information reported by the SOE, these companies was not part in any of infrastructure provision and barter arrangements during the reporting period 2017-2018.

## 7. RECOMMENDATIONS

The recommendations below are based on the findings and weaknesses that we noted during the scoping and reconciliation phases for the preparation of the 2017-2018 MEITI report. In the meantime, many reforms have been implemented in Myanmar and some of them may cover the issues detailed in the recommendations below. Details about the implemented and on-going reforms are presented in Section 3.4 of the report. Therefore, the following recommendations must be considered in conjunction with the different reforms being implemented.

### 7.1. Current year recommendations

We raised several findings and have made recommendations with a view to improve the EITI process in Myanmar and governance of the extractive sector and revenue management. The findings raised are summarised as follows:

#### 7.1.1. Availability of B.O information

According to the EITI requirement 3.11 Beneficial ownership : “It is recommended that implementing countries maintain a publicly available register of the beneficial owners of the corporate entity(ies) that bid for, operate or invest in extractive assets, including the identity(ies) of their beneficial owner(s) and the level of ownership. Where this information is already publicly available, e.g. through filing to corporate regulators and stock exchanges, the EITI Report should include guidance on how to access this information”.

The MSG agreed in its 25<sup>th</sup> meeting resolution held on 27 November 2017:

- for the companies from BO Data Collection Phase I to update their BO Data and;
- to collect BO Data for any additional companies from 5th MEITI Report Scope which are not part of BO Data Collection Phase I.

This means that the information was not requested within the reporting templates addressed to the companies included in the scope but will be extracted from the external B.O report prepared exclusively for this purpose.

We have been provided with the Review of the first MEITI beneficial ownership disclosure dated on January 2020 for the consultant Charlotte Boyer. This Report states that the 162 companies included in the scope of the 4th MEITI report (FY 2016-2017) were requested to disclose their beneficial owners through an online form before 28 October and 8 November 2019.

Charlotte’s latest report dated 20 Feb states that “121 companies submitted their form on time, or a submission rate of 74%. Among the submitted forms, 80 were judged fully filled-in with consistent information, while 10 were categorized as containing minor errors or omissions, and 31 as containing significant gaps undermining the credibility of the data or translating a weak understanding of the beneficial ownership requirements. In total, 270 beneficial owners were reported, among them 261 natural persons. 90% of the beneficial owners are natural persons exerting their control through direct shares, illustrating how companies have, in their overwhelming majority, straightforward structures with beneficial owners being the shareholders.”

Table below shows the status of companies’ submissions by sector:

Sub-Sector	B.O not submitted	B.O submitted	Total	%
Jade & Gems	15	68	83	81%
Mining	10	20	30	68%
Oil and Gas	12	19	31	61%
Oil and Gas Transportation	3	1	4	25%
Pearl	1	9	10	90%
SOE	1	4	5	80%
<b>Total</b>	<b>42</b>	<b>121</b>	<b>163</b>	<b>74%</b>

After reviewing the first MEITI beneficial ownership disclosure, we noted that 240 companies from the 2017-2018 scope were not included in the disclosure because they were not under the scope in the first disclosures.

Sector	Review of the first M-EITI beneficial ownership disclosure (2016-2017 Scope)						2017-2018 Scope (companies not contacted)
	2017- 2018 Scope	Fully completed BO Form	BO Form submitted with Minor Gaps	BO Form submitted with Significant Gaps	BO Form Not Submitted	Total Companies contacted to submit a BO Form	
Jade & Gems	209	49	2	6	12	69	140
Mining	94	11	1	5	7	24	70
Oil and Gas	56	4	3	10	11	28	28
Oil and Gas Transportation	5	-	-	1	3	4	1
Pearl	11	7	-	2	1	10	1
SOE	5	2	1	1	1	5	-
Other companies (out of 2017-2018 scope)	-	7	3	6	8	-	-
<b>Total</b>	<b>380</b>	<b>80</b>	<b>10</b>	<b>31</b>	<b>43</b>	<b>140</b>	<b>240</b>

### Recommendation

We recommend that the MSG invite the various stakeholders in the extractive sector in order to collect the information regarding the B.O of the companies included in the scope.

## 7.1.2. Publication of loans contracts

According to the EITI requirement 4.1 Defining the taxes and revenues to be covered in the EITI Report Infrastructure provisions and barter arrangements : “ The multi-stakeholder group and the independent administrator are required to consider whether there are any agreements, or sets of agreements, involving the provision of goods and services, including loans, grants and infrastructure works... Where the multi-stakeholder group concludes that these agreements are material, the multi-stakeholder group and the Independent Administrator are required to ensure that the EITI Report addresses these agreements, providing a level of detail and transparency commensurate with the disclosure and reconciliation of other payments and revenues streams. Where reconciliation of key transactions is not feasible, the multi-stakeholder group should agree an approach for unilateral disclosure by the parties to the agreement(s) to be included in the EITI Report.”

Following the reception of the Treasury Department and the SOEs reporting template, we identified the following loans contracted by the MOGE and ME1:

### MOGE:

Amounts in million

Nature	Currency	Total amount of the loan/loan guarantee	Terms of the Transaction			
			Date of the Agreement	Repayment period	Interest rate	Outstanding amount on 31/03/2018
(1) China Loan	USD	81				36
	Euro	638				502
	RMB	7,358				4,751
(i) Drilling Rigs & Oil field Equipment & Materials Project	USD	81	27/09/2007	15(5)	3%	36
(ii) Yadana-Yangon 24" Natural Gas Pipeline	Euro	186	20/12/2009	20(5)	4.50%	150
(iii) Offshore Natural Gas Pipeline Shwe Project	Euro	334	30/11/2010	20(5)	4.50%	280

Nature	Currency	Total amount of the loan/loan guarantee	Terms of the Transaction			
			Date of the Agreement	Repayment period	Interest rate	Outstanding amount on 31/03/2018
(iv) Onshore Natural Gas Pipeline Shwe Project	Euro	119	30/11/2010	20(5)	4.50%	72
(v) Oil Pipeline Project	RMB	7,358	30/11/2010	20(5)	4.50%	4,751
<b>(2) Japan Loan</b>	<b>JPY</b>	<b>11,630</b>				<b>11,624</b>
(i) The Offshore Petroleum Exploration & Oil Development Project (MY-C1, JICA)	JPY	11,630	15/01/2013	40(10)	0.01%	11,624

#### ME1:

Amounts in million							
Beneficiary	Sector	Currency	Total amount of the loan	Terms of the Transaction			
				Date of the Agreement	Repayment period	Interest rate	Outstanding amount on 31/03/2018
I. No(1) Mining Enterprise							
(1) Japan Loan							
(i) Steel Mill Renovation (MY-C1, JICA)	Mining	JPY	3,051	15/01/2013	40(10)	0.01%	3,050
Total		JPY	3,051				3,050

Those loans are not published in the websites of the relevant SOEs and we have not been able to obtain a copy of those contracts.

#### Recommendation

We recommend that the MSG invite the various stakeholders including the management of the SOEs and the Treasury Department in order to take the appropriate measures to guarantee the transparency of the publication of loans contracts.

### 7.1.3. Including the Myanmar Port Authority (MPA) in the scope

According to the EITI requirement 4.2 “The EITI Report must provide a comprehensive reconciliation of government revenues and company payments, including payments to and from state owned enterprises, in accordance with the agreed scope (Requirement 4.1). All companies making material payments to the government are required to comprehensively disclose these payments in accordance with the agreed scope. An entity should only be exempted from reporting if it can be demonstrated that its payments and revenues are not material. All government entities receiving material revenues are required to comprehensively disclose these revenues in accordance with the agreed scope.”

Following the reconciliation phase and the reception of the reporting template from the companies and government agencies and SOEs, we identified that a significant proportion of the right of way paid by the Oil and Gas transportation sector is collected by the Myanmar Port Authority which was not included in the scope of the report.

#### Recommendation

We recommend including the Myanmar Port Authority in the next EITI reports in order to ensure the completeness of the extractive sector information and the reconciled revenue of the sector.

#### **7.1.4. Compliance of the Extractive sector regulation and transparency with the economic policy of the Union of Myanmar**

The economic policy of the Union of Myanmar<sup>1</sup> is people-centred and aims to achieve inclusive and continuous development. It aims to establish an economic framework based on the just balancing of sustainable natural resource mobilisation and allocation across the States and Regions.

The Myanmar government's 12-point Economic Policy accentuates the strategic role of EITI in the reform process, specifically in natural resource governance.

The implementation of this policy is performed through the Myanmar Sustainable Development Plan (2018 - 2030) which include directives aiming to accomplish those objectives. One of the directives includes expanding the financial resources through transparent and effective public financial management by the Improvement of land governance and sustainable management of resource-based industries ensuring our natural resources dividend benefits all our people.

Following the review of the Myanmar extractive mainstream, we noted that the sector does not fully comply with those principles and policies.

##### **Recommendation**

We recommend that the MSG invites the different stakeholders in the extractive sector to participate to the efforts to align the Myanmar legislation and contracts with the principles in this policy by:

- Inviting the SOE's to publish their financial statements and contracts related to the extractive sector including the exploitation and loans contracts; and
- Aligning the extractive legislation with the EITI principles.

#### **7.1.5. Including mandatory BO disclosure in the process of awarding, and transferring extractive licenses in Myanmar**

In Myanmar, the procedures relating to the award, transfer and disposal of petroleum blocks is governed by the Petroleum Act, 1934 and the Petroleum regulation (please refer to Section 3.2.2). Furthermore, the award of the mining licenses is governed by the Mines Law, 1994 as amended in 2015 and the Mines Rules, 2018 while the gemstone sector is covered by Myanmar Gemstone Law, 2019.

We note that the abovementioned laws and regulation do not include specific provisions relating to the disclosure of the Beneficial Ownership neither require BO data as mandatory filing prior to the award of an extractive license or its transfer or disposal in Myanmar.

Furthermore, we understand that extractive companies and SOEs have been required to disclose their BO data by January 2020 through a notification from the GUOM which empowered the BO task force to collect this information. BO data is being gathered from the extractive companies through the EITI process and more precisely through the BO pilot report published in 2018 (please refer to Section 3.7.2).

However, the BO data collected and published in the pilot report presented several gaps in terms of the comprehensiveness and quality of data collected. Moreover, we note that many companies included in the MEITI reconciliation scope 2017-2018 were not involved in the pilot BO project and hence did not report their BO data (please refer to Section 3.7.5).

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<sup>1</sup> [https://themimu.info/sites/themimu.info/files/documents/Core\\_Doc\\_Myanmar\\_Sustainable\\_Development\\_Plan\\_2018\\_-\\_2030\\_Aug2018.pdf](https://themimu.info/sites/themimu.info/files/documents/Core_Doc_Myanmar_Sustainable_Development_Plan_2018_-_2030_Aug2018.pdf)



## Recommendation

We recommend to MOE and MONREC to consider including the disclosure of the BO data among the required disclosures for the application to extractive licenses in Myanmar. Therefore, any applicant who wishes to obtain an extractive license will be required to disclose his Beneficial Owner. This disclosure must be compliant with the definition of BO as approved by the MSG.

The same requirement must be applicable for the transfer and disposal of extractive licenses in Myanmar.

### 7.1.6. Implementation of systematic disclosure of EITI information

Extractive industry transparency should not be confined to an EITI Report, but rather be an integral part of how governments manage their extractive sector.

EITI implementing countries are increasingly making the information required by the EITI Standard available through government and corporate reporting systems (databases, websites, annual progress reports, portals etc.) - rather than relying on the EITI Report - to bring about transparency.

Mainstreaming is about encouraging and recognising countries that make transparency an integral and routine feature of their governance and management systems.

Following the review of the mainstream in Myanmar, we noted the lack of public availability of EITI information (contracts, financial statements of the SOEs...)

## Recommendation

We recommend that the MSG invite the various stakeholder in order to prepare a study on the systematic disclosure and make recommendations on public availability of EITI information. This would enable the MSG to shift their attention away from collecting data toward encouraging stakeholders to make effective use of this information.

### 7.1.7. Submission of reporting templates

According to the instructions for Completion of Reporting Templates:

- a) For private companies: hard copies with original signatures and a copy of the audit report should be sent in sealed envelope to NCS Office; and reporting templates submitted by private companies should be signed by a person authorized to represent the company (Chief Financial Officer or Chief Executive Officer/Director);and
- b) Reporting Templates submitted by Government Agencies and SOEs should be signed by a person authorised to represent the Government Agency and certified by the Office of the Auditor General (OAG) of the Union.

We noted that;55 companies did not submit their reporting templates, for which the total payments reported by the Government represents 1.01% in the total reconciled revenues as detailed by sector below:

Sub-sector	Number of companies	Govt revenue after adjustments	Total non-submission companies	%
Oil and Gas sector	36	991,661	15,234	2%
Oil and Gas transportation sector	15	405,806	-	0%
Gems and Jade sector	4	411,751	56	0%
Other minerals sector	-	124,230	3,358	3%
Pearl sector	-	2,498	-	0%
Total	55	1,935,946	18,648	1%

Also, the reporting templates received from companies representing 3% of the revenues reported by the companies were not approved by an authorised company official as shown in the summary table below:

Sub-sector	Government revenue after adjustments	Not signed RT	%
Oil and Gas sector	991,661	1,356	0%
Oil and Gas transportation sector	405,806	-	0%
Gems and Jade sector	411,751	55,321	13%
Other minerals sector	124,230	6,003	5%
Pearl sector	2,498	38	2%
Total	1,935,946	62,717	3%

And finally, we noted that reconciled revenues reported by Government Agencies and SOEs, were certified by the Office of Auditor General (OAG) except for MGE unilateral disclosure which payments amounted MMK 49,737 million and represents 2.6% of the total revenues reported by Government Agencies and SOEs.

#### Recommendation

We recommend that the MSG invite the various stakeholders and participants in the extractive sector to take measures in order to increase the coverage of the companies submitting their reporting templates and make sure they submit the certified RT.

## 7.2. Follow Up of Prior Years' Recommendations

We received the updated follow up of recommendations in Burmese language, the translation should be inserted in the prefinal version of this report

S/N	Agency	Recommendation from the 1st, 2nd and 3rd and 4th Reports	Prior Year Update/Progress/Comments from Agency	Implemented (Yes, No, Ongoing, Partially) [To update - Below status is from last year report]	Current year Update/Progress/Comments from Agency
1	<ul style="list-style-type: none"> <li>MSG</li> <li>All Agencies</li> </ul>	<p><u>Contract Disclosure, Exploration and Export,</u> <u>Comprehensive Disclosure of Taxes and Revenues, Data Timeliness</u></p> <p>MSG should consider to work with government agencies to strengthen the EITI Implementation and also consider working with the government to issue an administrative order or notification to support the implementation. (1)</p> <p>On 28 February 2019, the global EITI Board agreed in principle to proposed changes to the EITI Requirements, including:</p> <ul style="list-style-type: none"> <li>- Contract transparency and disclosure: Disclosure of new contracts between the state and the companies, with mandatory disclosure of contracts signed or amended after 1 January 2021.</li> <li>- Strengthening disclosure requirements regarding state participation, transactions related to state-owned enterprises and quasi-fiscal expenditures.</li> <li>- Mainstreaming transparency: Encourage systematic public disclosure of extractive data instead of reliance on EITI Reporting for comprehensive disclosure of extractive data.</li> </ul>	<p>MOEE Comments</p> <ul style="list-style-type: none"> <li>• Regarding the Project-level Reporting it is to coordinate with the operators jointly cooperated in the projects as well as the departments/ organizations which have been performing related works for presentation in the future periods.</li> <li>• Regarding the performance in terms of transparency besides the relevant data regarding the natural resources have been described in the EITI Report, it is required to perform feasibility study on the international good experiences for the strengthening of public disclosure of data relating to the natural resources so that Independent Administrator (IA) is requested to help and aid in this regard.</li> <li>• Arrangement has been made on timely basis for posting the statistics and accounts of the operator and consortium relevant to Oil and Natural Gas and current situation on the MOEE Website.</li> <li>• For posting of the updated extractive activities and data on the website, the Civic Society Organizations (CSOs) has been performing regarding such accounts/data and the Ministry of Commerce and the CSOs have been describing the export data.</li> <li>• For the disclosure of the data regarding the Ministry of Electricity and Energy (MOEE), coordinated performance need to be done</li> </ul>	Ongoing	

S/N	Agency	Recommendation from the 1st, 2nd and 3rd and 4th Reports	Prior Year Update/Progress/Comments from Agency	Implemented (Yes, No, Ongoing, Partially) [To update - Below status is from last year report]	Current year Update/Progress/Comments from Agency
		<p>The EITI Board will look into transitional arrangements and have discussed possible ways to address this, including an approach whereby the 2019 Standard would come into force immediately. It is expected that the Implementation Committee will make a recommendation in April 2019.</p> <p>The Cabinet of the Government of the Union of Myanmar have issued a notification dated on 29 June 2018 to support the implementation of MEITI process, urging the respective “Union Ministries, State and Regional Governments, union level government organisations were being urged to cooperate with MEITI Leading Committee, Working Committee, MEITI Multi-stakeholder Group and National Coordination Secretariat office in order to implement MEITI process and activities for sustainable development of Myanmar.”</p> <p>For the fourth EITI report, only MOGE provided project level reporting for the oil and gas projects. We understand that project level data is not readily available from MONREC.</p> <p>To further strengthen EITI implementation, the MSG is encouraged to work with the extractive government agencies on the following actions:  - For the short-term purpose and for the next EITI reporting, to start early discussion on availability of government data for project-level reporting for</p>	<p>with the obtaining of the comment from the CSOs.</p> <ul style="list-style-type: none"> <li>Regarding the information, close watch must be done on the accuracy and correctness based on the time period in order to timely present the information and the department must perform in cooperation with the relevant departments in order to present up to date information.</li> <li>Regarding the Quasi-Fiscal Expenditures it is needed to know accurately the meaning of QFE. The Independent Administrator (IA) needs to thoroughly clarify the definition of quasi-fiscal expenditure. It can be understood and performed how to arrange and keep the accounts only then thoroughly knowing and understanding on the quasi-fiscal expenditures and it is required to search solution and perform in coordination and cooperation with Office of Auditor General, Ministry of Planning and Finance (Budget Department) and Myanmar Oil and Gas Enterprise. Independent Administrator (IA) is requested to help and provide the requirements as the departments need to study the International Financial Regulations.</li> </ul> <p>DOM Comments:</p> <ul style="list-style-type: none"> <li>As the agreement is required by the private investors it can be disclosed/ described after revising and amending the contracts signed by conducting separate workshops.</li> <li>To send an official letter to the ministries by the office of National Coordination Secretariat (NCS) regarding the compulsory description of the contracts according to the advices of the International EITI Secretariat and new EITI Standard 2019/Myanmar Gems</li> </ul>		

S/N	Agency	Recommendation from the 1st, 2nd and 3rd and 4th Reports	Prior Year Update/Progress/Comments from Agency	Implemented (Yes, No, Ongoing, Partially) [To update - Below status is from last year report]	Current year Update/Progress/Comments from Agency
		<p>sectors other than oil and gas for the next MEITI report and engage with extractive companies to support in providing the information.</p> <ul style="list-style-type: none"> <li>- Revisit the confidentiality restrictions for extractive contracts, and implement changes to PSC terms, or regulations that require disclosure of information for EITI purposes an exception to any confidentiality provisions in advance of the implementation date of 1 January 2021.</li> <li>- It is encouraged that even prior to 1 January 2021, the list of operators and contractors who were awarded contracts and their current status of operations such as exploration/ study/ development/ production should be uploaded on the website of relevant government agencies for full transparency.</li> <li>- Extractive government agencies should consider to disclose the details of Myanmar's extractive activities on their websites to demonstrate transparency and accountability of the government sector. Such disclosures could also include data on revenue collected, production and exports, sources of data, manner of determination of values and volumes, etc., and be regularly updated.</li> </ul> <p>The MSG can consider to work with the government to issue an administrative order or notification to support the implementation of the above such disclosures.</p>	<p>Enterprise (MGE) is participating in the Mining Cadastre System as advices provided and is cooperating to apply the system.</p> <ul style="list-style-type: none"> <li>• In the MEITI 5th Report it will be coordinated and performed in cooperation with the departments of the Ministry for submission of the data on project level wise. In submission of the data relating to the royalty in order for drawing up the MEITI 4th Report, the No. (2) Mining Enterprise submitted project wise data. In the future reports to be written, it shall be performed that the data relating to the mineral type wise under the same company shall be provided.</li> <li>• Regarding the project level, special advice is being given that it needs to be clear in the scoping of the Independent Administrator (IA) who prepared the template and the members of Multi-Stakeholders Group (MSG) and NCS office should help in setting project level.</li> <li>• In the 2017-2018 Report it shall be performed to describe company wise royalty received instead of the sum in total.</li> <li>• The data regarding the minerals exploration, survey and production have been described/ disclosed in the Website of the Ministry from since (1.4.2016), the date of the first report was written, up to date.</li> <li>• It is necessary to link up with the Union Attorney General's Office in order to perform according to the Ministry's existing/ prevailing law, rules, procedures prescribed security standards and classifications and it is needed to coordinate and perform in advance from now onwards</li> <li>• It can be provided if there is clear instruction on the required data when the</li> </ul>		

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			<p>template is to be filled up. Since the commencing of the stage of scoping, details should be requested/ demanded regarding the License Holder. It should be discussed and performed in the nearest Multi-Stakeholders Group (MSG) meeting.</p> <p>MGE Comments: Regarding the Project-level Reporting, the technology, understanding and enhancement of the staff/employee capacity are needed. By successfully doing this, regarding the project-level reporting, it can thoroughly be presented to the relevant decision makers. According to the nature of Myanmar Gems Enterprise (MGE) it cannot be fixed in detail in determining the project level reporting. Regarding the disclosure of contracts the comments of the relevant companies can become challenges.</p> <p>There is no data available as the exploration work is not needed for Myanmar Gems Enterprise (MGE). Myanmar Gems Enterprise (MGE) is participating in the Mining Cadastre System as advices provided and is cooperating to apply the system.</p> <p>MOPF Comments: Regarding to “Disclosure”, it is to be submitted by the NCS to the working committee and leading committee to coordinate with respective ministries by viewing over other EITI implementing countries.</p> <p>IRD Comments: Noted. This recommendation applies to MSG and extractive government agencies.</p>		

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			<p>DGSE Comments:</p> <p>Regarding with systematic public disclosure of extractive data, DGSE accepts it. For project-level reporting, DGSE has no activity to describe in project-level. For implementation of changes to PSC terms, it needs to be in line with Myanmar Mines Rules.</p> <p>To upload list of operators, contractors and status of operations and disclose the details of Myanmar's extractive activities on the website of relevant government agencies for full transparency, mining cadastre is going to be implemented.</p>		
2	• All Agencies	<p><u>Contract Disclosure</u></p> <p>Government agencies should make available up-to-date model contracts on their websites while working towards the ultimate goal of disclosing all extractive contracts to improve compliance. Taxpayer Identification Number (TIN) for companies and cooperatives and the TIN or NRC for individuals should be included in the disclosure of permit-holder details as a unique identification number. (3)</p> <p>Extractive contracts were kept as confidential due to confidentiality clauses but model contract terms were provided. We understand that different operators have different terms in the contracts. Model contracts are available in the DOM's website. There was duplication of mining permits noted in the register and it was corrected during the reconciliation process. Permit-holder names were spelt differently in different records.</p>	<p>ME-2 Comments:</p> <p>ME-2 contracted with the companies for mining activities. Now, Directorate of Investment and Company Administration (DICA) has already installed online registry called Myco Database. So, companies' information is available at <a href="http://www.myco.dica.gov.mm">www.myco.dica.gov.mm</a>.</p> <p>MOEE Comments:</p> <p>If the model contract is posted on the Website it will be presented after obtaining the agreement from the relevant departments. For the posting of contract in the Website coordinated performance must be made according to the EITI Standard as it can only be made by obtaining the comments from the operator and consortium who have been cooperating in the projects as well as by obtaining comments from the concerned department/ organizations. Study needs to be done in similar cases in other EITI member/candidate countries and therefore the Independent Administrator (IA) is</p>	Ongoing	

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		<p>Disclosure of permit-holder details should include the Taxpayer Identification Number (TIN) for companies and cooperatives and the TIN or NRC for individuals and instead of only using names.</p> <p>The MCD uses IE codes to identify the exporters and importers and HS codes to identify the commodity. If the IA could provide IE code of the companies to the MCD in the following year, it would be easier for the MCD to collect information. Through the use of MACCS, the MCD would be able to provide information on import and exports in the following year.</p> <p>As an initial measure, all government agencies should post up to date model contracts on their websites if full disclosure of the terms of every contract is not feasible from confidentiality issues. The ministries should then move to disclosing all extractive contracts as this will improve compliance with EITI standards and make reconciliation process more meaningful and facilitate checking if all payments received are per contract terms and to monitor whether there were outstanding receivables from the extractive companies.</p>	<p>requested to provide help and aid of knowing the situation of the performance in this respect of some EITI countries.</p> <p>DOM Comments:</p> <ul style="list-style-type: none"> <li>• The number of license No. has been repeated/ identical as there are a variety of licenses issued based on the types of various mineral licenses. The good code system in State/Region wise has now been practised and performed in doing/ implementing Mining Cadastre in such case. Regarding the variance in describing the name of the companies, the departments, from one department to other, will be using similar company's registered name.</li> <li>• It should be coordinated to easily receive the TIN from the Internal Revenue Department (IRD) and it is required to link up the TIN and License Nos.</li> <li>• The samples of standard Contracts to be made with the Ministry have been described in the Ministry' Website and it shall be continued to coordinate with the departments within the Ministry and Union Attorney General's Office in order for the disclosure of the facts contained in the contract made.</li> </ul> <p>MGE Comments:</p> <p>The sample contract form has already been posted/ presented on the MGE Website. At present, the Rules is under drawing up and amending according to the new Myanmar Gems Law and if there is new sample of contract form is coming out it will be posted/ presented on the Website. Regarding the disclosure of contract, the</p>		



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			comments of the relevant companies could become challenges.		
3	• All Agencies	<p><u>Legal framework and fiscal regime</u></p> <p>There should be a summary of legal frameworks highlighting the relevant laws, rules, orders and notifications on SOEs and government agencies' websites. (6)</p> <p>Relevant laws, rules and notifications are not always available on the website of relevant ministries and SOEs.</p> <p>The government agencies and SOEs should provide a summary of legal framework on their websites and provide links to the relevant laws, rules, orders and notifications. In addition, they should also provide a link to the relevant ministry's website where relevant. For example, a link to the IRD website could be provided and the IRD should then ensure that all up-to-date laws, rules, orders and notifications relevant to the extractive industries would be found available on the website.</p>	<p>Agency Comments</p> <p>ME-2 Comments: Department of Mines has already uploaded laws and regulations on <a href="http://www.mining.gov.mm">www.mining.gov.mm</a>. There is no further comment on this recommendation since it is being implemented to upload the notifications.</p> <p>MOEE Comments: Laws, Rules and Notifications relevant to the departments are presented/ posted on the Ministry's Website and posting of Laws, Rules and Notifications relevant to the Oil and Gas on the Oil and Gas Planning Department (OGPD) Website is under programming and arrangement.</p> <p>DOM Comments: Law and Rules have already been described in the Ministry's Website and it shall be continuing to describe the notifications in the Website.</p> <p>MGE Comments: In <a href="http://www.mining.gov.mm">www.mining.gov.mm</a>, the 2019 Myanmar Gems Law has already been described. Currently the Rules are under amending and drawing up.</p> <p>IRD Comments: IRD has used its own website since 2010. IRD has provided up-to-date laws, rules, regulations, notifications, pamphlet, the latest news of the department, the announcement for taxpayers and the tax</p>	Ongoing	

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			reform process on IRD website: www.irdmyanmar.gov.mm. IRD also upload their updated information on the Ministry of Planning and Finance website: www.mopf.gov.mm. The promulgated laws, rules and regulations of IRD are provided and updated on other ministries' websites: www.myanmartradeportal.gov.mm and www.myanmar.gov.mm. which the links of those websites are described on IRD's website to access easily.		
4	<ul style="list-style-type: none"> <li>• MOEE</li> <li>• MONREC</li> <li>• MGE</li> </ul>	<p><u>License allocations</u></p> <p>The license allocation process should be transparent, formalise into regulations, and subject to independent review/audit. (7)</p> <p>Technical and financial criteria in awarding contracts/ permits in oil and gas and mining industry are not publicly available. The assessment on the past contracts/permits awarded were not disclosed except for the list of bidders.</p> <p>For the mining industry, we understand that mining permits were granted on a first-come-first-serve basis. If more than one entity applied for the same mining block at the same time, it would be awarded to the higher bidder.</p> <p>Based on the information provided by the government agencies for the gems and jade sector, we understand that mining permits were granted to the highest bidders.</p>	<p>Agency Comments</p> <p>OAG comments: Regarding with mining sector, revenues and expenditures accounts were prioritized to be audited whilst one case of license allocation process was audited. For the next audited period, it will be earmarked for license allocation process to be audited.</p> <p>For Oil and Gas sector, revenue collection and whether it is correctly described and involved in budget account have been audited, but not license allocation process in the FY of 2016-2017 and 2017-2018. For the next audited period, it will be earmarked for license allocation process to be audited.</p> <p>MOEE Comments: - Awarded Lists regarding the Oil and Gas Blocks have been posted/ presented on the Website. The Terms of Conditions have also been posted/ presented with the permission of the department. - There has been difficulty in posting/ presenting the Detailed Marking System regarding the contracts due to the security</p>	Ongoing	

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		<p>The government agencies should disclose the technical and financial criteria and applicable weightage used in awarding contracts/ permits to investors in order to improve transparency of the license allocation process.</p> <p>The license allocation process should be formalised into regulations and subject to independent review / audit (e.g. performed by OAG).</p>	<p>conditions. If it is possible, the practices of other countries in this respect need to be known so that the Independent Administrator (IA) is requested to help and aid in this respect.</p> <ul style="list-style-type: none"> <li>- In performing the projects relevant to the Oil and Gas, the projects have been implemented according to the comments of State President's Office, State Cabinet Office and other related organizations/ departments.</li> <li>- Regarding the work performance of projects, the Office of Auditor General (OAG) has been conducting Performance Audits.</li> </ul> <p>DOM Comments: The Myanmar Gems Enterprise's license allocation process is described in the government's newspapers and has been presented/ posted on the department's Website. There is no difficulty for MGE if the Office of Auditor General audits the license allocation process.</p> <p>MGE Comments: The Myanmar Gems Enterprise's license allocation process is described in the government's newspapers and has been presented/ posted on the department's Website. There is no difficulty for MGE if the Office of Auditor General audits the license allocation process.</p> <p>DGSE Comments: Regarding with disclosure of the technical and financial criteria and applicable</p>		

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			weightage, DGSE has described and uploaded them on government website.		
5	<ul style="list-style-type: none"> <li>• MOEE</li> <li>• MONREC</li> </ul>	<p><u>Register of licenses</u></p> <p>The government agencies and SOEs should maintain centralised public registers of contracts/permits with coordinates on their websites. (8)</p> <p>Coordinates of oil and gas blocks were provided by the MOGE but they were not uploaded on its website. The types of coordinates used in oil and gas and mining were not the same. It was found that application dates of gems and jade permits are included in the list of permits as of 1 April 2016 on Myanmar Gems Enterprise website, but application dates of minerals permits were not recorded as it was not required by the Mining Rules at that time. Public registers of contracts and permits were not available.</p> <p>The information on the mining permit register held by the DOM and Mining Enterprises were not consistent. We understand that the permit register is not shared across the agencies.</p> <p>ME2 was not able to provide the coordinates for all the mining blocks in time.</p> <p>There are no procedures documented over the return of mining permits in Gems and Jade.</p> <p>The government agencies and SOEs should maintain centralised public registers of contracts/ permits with coordinates on their websites so that public will be able to access information. This should include the procedures for the return of permits.</p>	<p>Agency Comments</p> <p>MOEE Comments:</p> <ul style="list-style-type: none"> <li>• The Coordinates of the Oil and Gas sector have been posted on the Website. The awarded dates regarding the blocks done for tender are as advertised in the newspapers. For the future tender processes awarded dates and date of signing the contracts shall be described on the Website.</li> <li>• The contractual tenure/ term of the PSC is normally 20 years and it is fixed based on the production/ distribution of natural gas.</li> </ul> <p>DOM Comments:</p> <ul style="list-style-type: none"> <li>• Although there cannot be any description during the period for the MEITI 4th Report to be prepared, initial recording teams have been formed and performed according to 2018 Myanmar Mines Rules and regarding the procedures on the license-in-return, details have been promulgated in the new Rules.</li> <li>• It is underway for the description of coordinate contained in the contracts in the Website and permit records are accumulated, maintained and described up to date from time to time.</li> </ul> <p>MGE Comments:</p> <p>Since 2016-2017 Financial Year, there are no new blocks allocation. If there will be any block allocation in the future it will be described/posted on the Website.</p> <p>According to the Myanmar Gems Law promulgated on (30.1.2019), the procedure</p>	Ongoing	

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			<p>relevant to the block-in-return is in inclusion in the new Myanmar Mines Rules which is under drawing. Currently if the block is closed, the block closing arrangement/ programme is to be drawn up and submitted and it is accepted only when it is completely performed.</p> <p>MGE is cooperating in the process of Mining Cadastre and when the Mining Cadastre System commences, MGE will perform as the advices provided.</p> <p>DGSE Comments: Regarding the types of coordinates, DGSE has started using UTM system. For maintaining a centralised public register of contracts/permits, Mining Cadastre is going to be implemented.</p>		
6	• MSG	<p><u>State Participation</u></p> <p>Entities determined to be SOEs should be fully engaged in the EITI reporting process including full disclosures of information required for state participation. (11)</p> <p>Requirement 2.6 states that for the purpose of EITI reporting, “a SOE is a wholly or majority government owned company that is engaged in extractive activities on behalf of the government. Based on this, the multi-stakeholder group is encouraged to discuss and document its definition of SOEs taking into account national laws and government structures.”</p> <p>MEHL and MEC are not treated as SOEs for</p>	<p>Agency Comments</p> <p>MOPF Comments: During 18th MSG meeting dated 29th January 2019, it was told that Myanmar Economic Holding Public Company Limited (MEHPCL) will participate in MEITI process especially in the publication of MEITI reports. Therefore, NCS needs to coordinate with MEHPCL and MEC in order to receive the required comprehensive information for the MEITI reports.</p> <p>DOM Comments (MSG representative): Due to Beneficial ownership disclosure has to be implemented on 1 January 2020, Beneficial Ownership Task Force and MSG decided that companies in the scope of 4th</p>	Ongoing	

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		<p>the EITI reporting to date, but more information should be obtained such as source of financing, and if there is any financial control/ returns to the government, and to clarify if these entities are government-owned or controlled. In addition the award of permits and licences to these companies should be made transparent.</p> <p>MEHL was initially set up as a special company in the name of Union of Myanmar Economic Holding Limited (UMEHL) under the 1950 Special Company Act in 1990 with the Union Budget where Share “A” was held by the Ministry of Defence and the Directorate of Defence Procurement and Share “B” was held by military personnel, ex-servicemen, regiments and units, and ex-servicemen-led organisations. MEHL changed its company status to a public limited company under 1914 Myanmar Companies Act in 2015 by transferring Share “A” to Share “B”.</p> <p>MEHL is not treated as SOEs for the EITI reporting to date, but more information should be obtained such as source of financing, and if there is any financial control/ returns to the government, and to clarify if these entities are government-owned or controlled. In addition the award of permits and licences to these companies should be made transparent.</p> <p>If MEHL is assessed to be a SOE, it should</p>	MEITI report including MEHPCL and MEC have to disclose their BO information.		

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		<p>be fully engaged in the EITI reporting process including full disclosures of information required for state participation under EITI requirement 2.6. For the fourth EITI report, MEHL participated as a reporting extractive company and the reconciliation process concluded with significant unreconciled differences between the company's and the government data.</p> <p>It is also expected that the Presidential Decree on BO will be released by June 2019 and companies in 5th MEITI report will have to disclose their BO information. MEHL would be required to provide the details of the shareholders and funding arrangement at that time.</p>			
7	• MSG	<p><u>State Participation</u></p> <p>Entities determined to be SOEs should be fully engaged in the EITI reporting process including full disclosures of information required for state participation. (12)</p> <p>Requirement 2.6 states that for the purpose of EITI reporting, "a SOE is a wholly or majority government owned company that is engaged in extractive activities on behalf of the government. Based on this, the multi-stakeholder group is encouraged to discuss and document its definition of SOEs taking into account national laws and government structures."</p> <p>MEHL and MEC are not treated as SOEs for the EITI reporting to date, but more</p>	<p>Agency Comments</p> <p>MOPF Comments: During 18th MSG meeting dated 29th January 2019, it was told that Myanmar Economic Holding Public Company Limited (MEHPCL) will participate in MEITI process especially in the publication of MEITI reports. Therefore, NCS needs to coordinate with MEHPCL and MEC in order to receive the required comprehensive information for the MEITI reports.</p> <p>DOM Comments (MSG representative): Due to Beneficial ownership disclosure has to be implemented on 1 January 2020, Beneficial Ownership Task Force and MSG decided that companies in the scope of 4th MEITI report including MEHPCL and MEC have to disclose their BO information.</p>	Ongoing	

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		<p>information should be obtained such as source of financing, and if there is any financial control/ returns to the government, and to clarify if these entities are government-owned or controlled. In addition the award of permits and licences to these companies should be made transparent.</p> <p>No information was made available on the shareholdings of MEC.</p> <p>MEC is not treated as SOE for the EITI reporting to date, but more information should be obtained such as source of financing, and if there is any financial control/ returns to the government, and to clarify if the entity is government-owned or controlled. In addition the award of permits and licences to the company should be made transparent.</p> <p>If MEC is assessed to be a SOE, it should be fully engaged in the EITI reporting process including full disclosures of information required for state participation under EITI requirement 2.6. For the fourth EITI report, MEC participated as a reporting extractive company and the reconciliation process concluded with significant unreconciled differences between the company's and the government data.</p> <p>It is also expected that the Presidential Decree on BO will be released by June 2019 and companies in 5th MEITI report will have to disclose their BO information.</p>			



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		MEC would be required to provide the details of the shareholders and funding arrangement at that time.			
8	SOEs	<p><u>State participation, Transactions related to state-owned enterprises</u></p> <p>SOEs should work towards demonstrating that they have no regulatory role to avoid any issues concerning conflict of interest. Audited reports of SOEs should be made publicly available. (9)</p> <p>The SOEs participating in the exclusive industries, such as MOGE, are units operating inside Government Ministries. They are not stand alone corporate entities. Their activities do give rise to material revenue including payments directly from the non-government companies involved in the extractive industries. They also act as contractors in projects.</p> <p>Audited reports from SOEs are provided to the IA upon request but are not publicly available at their websites or OAG's website. Although the IA was provided with SOE accounts that are previously not publicly available, details of loan financing and any equity were not fully transparent. It is recommended that all SOE financing (including guarantees), as well as any equity interests are fully disclosed by the SOEs. It is also recommended that the SOEs should work towards demonstrating that they have no regulatory role, whether initiating regulations or having oversight of regulations, to avoid any issues</p>	<p>Agency Comments</p> <p>OAG comments: According to the Auditor General Law Article 11 (A), the Office of the Auditor General of the Union (OAG) has to submit the audited findings of financial returns/budget data in Pyidaungsu Hluttaw or Pyithu Hluttaw or Amyotha Hluttaw at least once a year. If there is any urgent, OAG reports occasionally.</p> <p>According to Article 11 (O), OAG reports the audited activities to the President of the Republic of the Union of Myanmar at the same time to the Myanmar Union Parliament. The OAG send the report to the Public Account Committee (PAC). After the PAC has done the analysis, verification, and evaluation on the report submitted by OAG, the report will be published on the website of PAC <a href="https://pyidaungsu.hluttaw.mm/reports">https://pyidaungsu.hluttaw.mm/reports</a>.</p> <p>Regional/ State Auditor General reports to the Chief Minister of State/Region and the Regional Parliament as well.</p> <p>OAG follows the enacted Law, Rules and Regulations. The Auditor General of the Union Law 2010 was amended in 2013, 2014 and 22-Jan 2018 in which last date Amendment of the Law Article 11 (A) &amp; (O), 25 (A) and 25 (D).</p>	Ongoing	

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		concerning conflict of interest. The SOEs should also focus and report progress on best practice governance frameworks and transparency in financial reporting such as publishing audited financial statements showing fiscal revenue and expenditure clearly to the public.	<p>Likewise, occasionally, Regional/ State Auditor General reports to the Chief Minister of State/Region and the Regional Parliament as well.</p> <p>OAG submit findings report to Government Departments in EITI process and State-owned Enterprises (SOEs). Even though, the Office of the Auditor General of the Union (OAG) do not publish the report to the public directly, OAG reports the information to PAC regularly and it will be published on the website of PAC. In addition, OAG participates in the press conference.</p> <p>For the mining sector, there is no activity under loan.</p> <p>For Oil and Gas sector, there is no request letter from MOGE to OAG in order to produce the report for loans. The revenue, receivables from debt return and whether it is correctly described have been audited. For World Bank and ADB's loans have been audited with the request letters from MOGE and so, OAG will audit it when respective ministries release request letter. For the next audited period, it will be earmarked for license allocation process to be audited.</p> <p>ME-2 Comments: There is no any comment for it. MSG needs to take time in order to implement this recommendation.</p> <p>MOEE Comments: - In the Oil and Gas sector, the Oil and Gas Planning Department (OGPD) is playing regulatory role while the Myanmar Oil and Gas Enterprise (MOGE) is playing implementation</p>		

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			<p>role. The OGPD has been performing in accordance with the guidance of the Minister's Office for the contracts regarding the oil and gas blocks.</p> <p>- Regarding the Audited Financial Statements, the State-owned Enterprises (SOEs) have been performing according to the laws promulgated by the Office of Auditor General (OAG)(49-b)</p> <p>DOM Comments: For the reform process for SOE sector, MGE is currently cooperating in this process.</p> <p>MGE Comments: For the reform process for SOE sector, MGE is currently cooperating in this process.</p>		
9	<ul style="list-style-type: none"> <li>• DOM</li> <li>• MGE</li> <li>• ME1 and ME2</li> </ul>	<p><u>Production</u></p> <p>There should be independent review mechanisms in place to verify beneficial ownership of companies and production data. (2)</p> <p>Significant differences were noted in the production volume reconciliation for gems and jade, and minerals. DOM, MGE, ME1 and ME2 should take initiatives to improve quality and completeness of production data for each gems and jade and minerals project through verification of revenue and production data.</p> <p>We would recommend that reviews should include: - Beneficial ownership of companies, including determination of whether BO rests with offshore entities or individuals</p>	<p>Agency Comments ME-2 Comments: There are differences in production data reported by government agencies and companies during the reconciliation phase. This is because of cut-off error.</p> <p>DOM Comments: • The variances occurred in checking / verification is cut off error due to the difference of financial period defined/ practised by the company and the Ministry. • Regarding the Beneficial Ownership (B.O) it has been prescribed to describe on the 1.1.2020 without fail, it shall initially be performed with the companies participating in preparing MEITI 4th Report according to the decisions/ resolutions of Beneficiary Ownership Task Force and Multi-Stakeholders Group (MSG).</p>	Ongoing	

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		and a determination of whether such ownership is legal. - Production data by output, value and quality should be independently reviewed when possible and reconciled to sales and export data.	MGE Comments: All the production volume extracted and produced within one financial year could not be sold in the gems emporium held in such financial year. Annual verification and reconciliation on the annual production accounts and sales/revenue accounts could not be done due to the need of storing of the gems and selling of the products based on the market demand/ requirement. There are differences in between the production volume and sales volume due to the following conditions: there are gems received in the past financial years included, low grade gems not meeting the standard set for the Gems Emporium are appeared when doing the cutting and polishing of the raw gemstone and there used to be weight losses of gems. The accounts of the department are held annually audited by the Office of Auditor General and monthly audited by internal auditors as well as inter departmental audit.		
10	<ul style="list-style-type: none"> <li>All Agencies</li> <li>MONREC</li> </ul>	<u>Exports</u>  Export data should be maintained and made readily available. (13)  Export data on volume and value by commodity is not publicly available although there is aggregated export data available in Central Statistical Organisation (CSO) Year Book 2017.  Although export volume and value are required to be reported to the respective government agencies, there is no proper recording or monitoring system and export data was not independently	Agency Comments  ME-2 Comments: ME-2 has already provided export data on minerals and revenues received to IA. In order to upload it on the website, ME-2 will coordinate with Department of Mines (DOM).  MOEE Comments: In the Myanmar Oil and Gas Enterprise (MOGE) has kept the daily production accounts and export accounts of companies. There is also an appraisal of the export accounts. In the Ministry of Commerce and Custom Department the export accounts are being kept. In the MOGE the custom declaration	Ongoing	

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		<p>validated. For example, information on request for export recommendation was kept and the actual export data was not reported to the government agencies.</p> <p>The government agencies should set out procedures for extractive companies to report on export by commodity in volume and value, accompanied with customs declaration forms for export to enable easy access to the export data.</p> <p>For gems and jade, a significant difference was noted between the production volume and emporium sales volume.</p> <p>The MONREC should also ensure that the export outside of emporium sales can be identified through its reporting system. In addition, the MONREC should also require the companies to report on the volume of inventory and perform periodic physical verification of the inventory.</p>	<p>forms together with export accounts and data of companies are systematically kept and performed.</p> <p>DOM Comments: It shall be performed after studying the export data contained in such CSO Year Book 2017. Although our Ministries issue the Export License Recommendation, it is required to coordinate and perform with the Trading Department whether the goods are really exported or not.</p> <p>MGE Comments: All the production volume extracted and produced within one financial year could not be sold in the Gems Emporium held in such financial year. There are differences in between the production volume and sales volume due to the following conditions: there are gems received in the past financial years included, low grade gems not meeting the standard set for gems emporium are appeared when doing the cutting and polishing of the raw gemstone and there used to be weight losses of gems.</p> <p>For the sales of gems from gems retail shops which got the license from the MGE, the shops sells the foreigners abroad with Cash Memo and the tax was collected at the time of exchanging the new Cash Memo. For the domestic sales, the sales and tax payment were appraised when the shops renew their license terms/tenure. The sales of gems retail shops are checked one in every six months. It is therefore difficult to present financial year wise.</p>		

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11	• All Agencies	<p><u>Data quality and assurance</u></p> <p>SOEs and government agencies should continue to address the prior years' recommendations for accounting and other system reforms, including implementing greater automation in recording of data and reduced reliance on manual records. (5)</p> <p>During the data reconciliation process, we noted unreconciled differences relating to withholding tax and stamp duty payments reported by the extractive companies but not confirmed by IRD as IRD did not have such data readily available in respect of each tax payer.</p> <p>MCD implemented automation of system in November 2016 commencing with Yangon which improved data quality, and unreconciled differences mainly arose in the period before November 2016.</p> <p>DOM was not able to provide readily aggregated revenue data for not in-scope companies.</p> <p>The first, second and third MEITI reports have included recommendations on improving the quality of data from government including reform, strengthening and computerising government accounting systems, and establishing a country-wide single database for companies with correspondingly unique Taxpayer Identification Number (TIN).</p>	<p>Agency Comments</p> <p>MOEE Comments: In implementing the works for the improvement and enhancement of the data quality by the State-owned Enterprises (SOEs) and the government departments, the Internal Revenue Department (IRD) as well as Myanma Oil and Gas Enterprise (MOGE) are to be performed in cooperation. It shall be appropriate to establish and perform Computerized Accounting System by setting an accurate software programme for the systematization of the accounts and records and financial and technical assistance in this respect is needed.</p> <p>IRD Comments: IRD does not have capacity to meet this recommendation at present. Aggregate salary withholding tax information is available, however cannot be presented by industry segment. It will be possible with the successful deployment of relevant functionality in the new IT system (ITAS). This is not expected before 2020 at the earliest. Taxpayer IDs do not apply to payments of Stamp Duty according to the Myanmar Stamp Act. Therefore, this may be possible with the implementation of IRD's Integrated Tax Administration System (ITAS) at some point in 2020 or later years. In collaboration with DICA, unique taxpayer identification numbers are now issued to all corporate taxpayers. IRD has commenced the process for configuring and deploying its new IT system which will support its transition to a modern tax administration. However,</p>	Ongoing	

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		The SOEs and government agencies, in particular the IRD, should continue address the prior years' recommendations for accounting and other system reforms. Greater automation in recording of data and reduced reliance on manual records would improve the quality of data and hence increase the level of assurance in the reconciliation process.	<p>taxpayers will not experience the effects of this reform before 2020.</p> <p>In accordance with the Tax Reform Program of Internal Revenue Department, Ministry of Planning and Finance 2017-2022, the Data Centre is started establishing in Nay Pyi Taw and Yangon using the ITAS (Integrated Tax Administration System) for taxation. It will be practiced not only for the extractive industries but also for the other industries as per the project: MMPFM (Myanmar Modernization for Public Financial Management. At the LTO office, it has been performed with small scale computer system (Tax Revenue Management System-TRMS) and all organizations under extractive industries sector are recorded. At present the procurement of an Integrated Tax Administration System (ITAS) is under way. Although it takes several years to use in the whole country, a data base system can be drawn up and used for the policy objectives. IRD is doing the reform process in accord with the timeline, and the progress of prior recommendations concerned with IRD's reform has already been sent to MEITI-NCS office.</p> <p>DOM Comments: As there is no ring facing by project wise, a Ring Facing System regarding the mining sector should be established by the Ministry of Planning and Finance (MOPF).</p>		
12	<ul style="list-style-type: none"> <li>• MOGE</li> <li>• Treasury</li> </ul>	<p><u>Transactions related to state-owned enterprises</u></p> <p>Payments received from extractive companies should be transferred to OGD</p>	<p>Agency Comments</p> <p>MOEE Comments: - The minimum amount of money that needs to be retained in the Bank by the Shwe</p>	Ongoing	<p>MFTB response :</p> <p>1. There was received the request letter about the information of MFTB EURO collection account such as the amount which need to maintain in EURO collection account and procedure of payment order issue.</p>

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		<p>on a timely basis. Amounts in overseas bank accounts should be reconciled to the earnings received and remittances made. (10)</p> <p>We understand that the Shwe project has taken a loan under the name of Myanmar Foreign Trade Bank (MFTB) from China Development Bank. The revenue received by Shwe Project was paid to the MFTB's Euro currency account bank account in Germany and MFTB transferred the funds after leaving minimum amount of money that needs to be retained in the bank account. However, the amount that is required to be retained in the bank is not made available.</p> <p>As set out in Section 3.5.5, the amount transferred by MOGE to the government agencies and Union Fund (OA) in FY2016-2017 is higher than MOGE's revenue received in FY2016-2017. This is related to the transfer from MOGE to OGDP where MOGE received the revenue from oil and gas companies (Posco Daewoo and SEAGP) at the MFTB bank account in Germany but transferred to OGDP at a later timing from the date of receipt of funds in its MEB bank account.</p> <p>The below table sets out the MOGE's revenue based on invoices raised to POSCO Daewoo, the funds received in the EURO bank account, payment transfers raised by MFTB and amounts received by MFTB. The significant payment made from MOGE to OGDP in the Financial Year 2016-</p>	<p>Project is in accordance with the terms agreed in the Loan Contract.</p> <ul style="list-style-type: none"> <li>- Regarding the payments by the extractive companies, the OGPD is accepting and performing only the royalty and signature bonus relevant to the OGPD.</li> <li>- The verification and reconciliation of the money transferred and earnings received by date wise was audited by the Office of Auditor General (OAG) every year.</li> </ul> <p>Treasury Department Comments: Regarding the recommendation 9.1, only Myanmar Foreign Trade Bank (MFTB) can be aware of this as the EUR Facility Agreement had been signed between MFTB and CDB on 30-11-2010 to implement Shwe Project with a loan taken from China Development Bank (CDB), the People's Republic of China.</p>		<p>2. Regarding to above matter, MFTB reply the information are as follow:</p> <ol style="list-style-type: none"> <li>1. MFTB was operation perform the foreign currency received of state own enterprise from oversea countries and remittance to foreign countries. MFTB issued PO which was equivalent to Myanmar Kyats to respective departments when foreign currency received from foreign currency and the remittance made by MFTB to foreign countries for loan principle and interest repayment of trading and non-trading of respective departments in accordance with the order form budget department.</li> <li>2. According to the contract which made between the MFTB and China development Bank, amount received from Myanmar of repayment source project are deposit to EURO collection account which opened at the Bank of China, Frankfurt. MFTB inform to MOGE when money received in EURO collection account and send copy to Budget department. Payment Order (PO) was issued by MFTB to MOGE and make reconciliation in real time situation. There is not difference till now.</li> <li>3. There was only the transactions of received from repayment source projects and issued PO and remaining PO outstanding balance. MFTB make reconciliation in real time situation and continuing issued the remaining PO outstanding balance.</li> <li>4. MFTB does not available to know the how much income received form the repayment source project. There does not described the how much income received by loan contract. The information can available from the JV agreement which made between the paying parties as project implementation partner as the SEAGP (South East Asia Gas Pipeline Company limited) Daewoo International Cooperation including MOGE parties. MFTB can only available the total received amount in EURO collection account.</li> <li>5. There had been explained about the income record of MOGE in relation with loan from China Development Bank by the representative of MFTB at the meeting which</li> </ol>



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		2017 is arising from the revenue received in the Euro bank account in previous financial years, but only transferred to MOGE's MFTB bank account in FY2016-17. All payments received from extractive companies should also be transferred to OGDG on a timely basis. The amounts in the overseas bank account should be reconciled to the earnings received and bank transfers to OGDG to date.			conducted at MEITI NCS office. 6. The income record of MOGE is not only included the income which related to China Development Bank but also included the others income sources. Therefore, MFTB reply the require information should request directly to MOGE.
13	<ul style="list-style-type: none"> <li>• SOEs</li> <li>• MOPF</li> </ul>	<p><u>Distribution of extractive industry revenues</u></p> <p>There should be clear policies and procedures over usage of extractive revenue collected by the Government agencies. OAG should audit all the bank accounts, including bank accounts of all the SOEs, and consider to make the audit reports publicly available. (14)</p> <p>The SOEs Financial Management: No. Ba Kha - 3/ 20 (547/ 2012) dated 3 April 2012 sets out that with effect from 1 April 1 2012, the SOEs shall be operated commercially and on their own financial strength. The SOEs' profit and loss account shall be calculated based on the total revenues and the total expenditure, and the income tax on the profit must be paid according to the income tax law (25%) and 20% of profit shall be distributed to the Union. The surplus fund balance could be carried forward to the next fiscal year in the SOE's Union Fund Account - Other Account.</p>	<p>Agency Comments</p> <p>OAG comments:</p> <p>OAG annually check the bank accounts (SEE and OA) that are included in the Union Budget and it also describes when reporting templates are verified. If the authorized persons requested for the auditing of the Union Fund Account-Other Account (UFA-OA) in accordance with the Auditor General of the Union law, OAG performs accordingly. For 2017- 2018 Fiscal Year, the SEE and OA accounts from MGE in the Union Budget and the one OA which is requested with official letter have been audited.</p> <p>MOEE Comments:</p> <p>- The tax/revenue for the Myanma Oil and Gas Enterprise has been paid periodical wise in accordance with the fixation of the Internal Revenue Department (IRD). The Office of Auditor General (OAG) is verifying and reconciling the cash payments and cash receipts relevant to the tax payment. Within the departments of the MOGE and MOPF tax/ revenue and payment and receipt transactions are being performed with</p>	Ongoing	

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		<p>Sections 2.3.5.2, 2.3.5.3 and 2.3.5.4 sets out details of the UFA - OA for the extractive SOEs and it was noted that the total revenues received and total expenditure was budgeted as the Union revenue and allocated to the expenditure of the Union accordingly. The balance amount of the funds in the OA is treated as a liability to the government.</p> <p>In 2019, the National Economics Coordination Committee (NECC) issued a decision which is approved by the Union Government, that in respect of the SOEs' Other Accounts, the annual surplus shall be transferred to the Union Government's Budget with effect from the fiscal year 2019/20. However, it is not clearly prescribed how the remaining surplus in Other Accounts at the end of FY 2018/19 would be dealt with.</p> <p>We noted that the Union Government through MoPF has been coordinating with the relevant bodies issue notifications to prescribe the clear action plan for any surplus funds in Other Accounts at the end of FY2018/19 (e.g. transfer to Union Budget after budgeting for necessary amount to be retained in SOE for investment or expenditure purpose).</p> <p>MoPF informed on 26 April 2019 that permission was given at the Union Government's Meeting on 14 March 2019 to adjust and transfer the funds in the Other Accounts of the SOEs into the Union Fund. Based on MoPF Letter</p>	<p>documents as well as soft copies. If these daily routine works are to be done paperless system it is required to make programming and design appropriate software accurately. The capacity building is also needed regarding the application of such software. For doing such work, the financial and technical assistance are needed. In order for the financial accounts to become digitalized system for the departments, the support and aid is needed to be provided by the Independent Administrator (IA).</p> <p>MGE Comments: MGE pay once in every three months according to the budget provision. MGE's annual Other Account (OA) and Accounts of State Economic Enterprise (SEE) are audited by the Office of Auditor General (OAG)</p>		

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		<p>SaBa/Finance-4/1/1(550-2019) dated 28 February 2019:</p> <ul style="list-style-type: none"> <li>• All state-owned economic enterprises that have opened the Union Fund Account UFA-OA (Other Account) are to proceed only with the UFA-SEE account starting from the 2019-2020 Financial Year. All allocations and expenses must be incurred from UFA-SEE account within the permitted limit of Union Budget.</li> <li>• Accounts associated with the Union Fund included in the balance of the Union Fund Account (UFA-OA) as of 30 September 2019 must be transferred to the UFA-SEE account after being inspected and approved by the OAG. All remaining balance of UFA-OA that has been inspected and approved by the office of the Union's Auditor General is to be adjusted and transferred, and UFA-OA Accounts must be closed.</li> </ul> <p>We noted SOEs are not making quarterly payment of income tax. SOEs should comply and make quarterly income tax payments to the IRD</p> <p>Spending policy and procedures from UFA (Other Accounts) were prescribed in the Citizen Budget that is publicly available. Changes in the UFA (Other Accounts) for the year were provided in the reporting template. Details of UFA (Other Accounts) were later provided by the SOEs. Based on the Audit Report on the Union Budget for FY 2016-2017 (previously available online), it was found that not all the bank accounts of SOEs were audited by the</p>			

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		<p>OAG. For example, MGE has five bank accounts and the number of other accounts audited by the OAG was reported as one.</p> <p>OAG should audit all the bank accounts, including bank accounts of all the SOEs, and consider to make the audit reports publicly available.</p>			
14	• All Agencies	<p><u>Contribution of the extractive sector to the economy</u></p> <p>The government agencies should consider systematic disclosure and regular update of employment data for the extractive industries on their websites. (4)</p> <p>Employment data for all the extractive industries is not available. The employment data disclosed in this report is based on the data reported by the reporting entities. We recommend that the respective government agencies should require periodic (or at least annual) reporting of headcount at the extractive companies and within the government and maintain employment information for the sector.</p> <p>The government agencies are also encouraged to consider systematic disclosure and regular update of extractive data on government websites, including employment data for the extractive industries. We understood that the DOM has already published employment information on their website.</p>	<p>Agency Comments</p> <p>ME-2 Comments:</p> <p>The employment data of companies that were jointly implemented with ME-2 during the fiscal year of 2016-2017 has already been sent to MEITI-NCS office dated 22nd April, 2019.</p> <p>MOEE Comments:</p> <p>- In the Myanmar Oil and Gas Enterprise, there are staff/ employees statements/records for those companies joint ventured with MOGE.</p> <p>- Independent Administrator (IA) need to help and provide Reporting framework for systematic keeping of records/statements in the department according to the EITI requirement and in order for posting updates on the webpage as the companies are currently keeping the staff/employees record according to their own formats and arrangements shall be made in coordination/cooperation with the relevant organizations in order for systematic keeping of staff records/statements in accordance with such framework.</p>	Ongoing	

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			<p>DOM Comments: It has already been sent to the NCS Office.</p> <p>MGE Comments: As the staff/ employees records/statements are kept monthly basis and used to send it to the Ministry once in every three months (quarterly), such records/ statements shall be presented/ posted once in every three months on the department's Website in the future.</p> <p>DGSE Comments: Regarding employment data of extractive industries to be disclosed and updated on government websites, DGSE has already sent employment data for 2016-2017 Fiscal Year. Later, they will be uploaded on government website</p>		
15	<ul style="list-style-type: none"> <li>• MOEE</li> <li>• MONREC</li> </ul>	<p><u>Social expenditures by extractive companies</u></p> <p>A formalised reporting framework for mandatory CSR expenditures should be implemented to facilitate consistent reporting of information required by the EITI Standard. (15)</p> <p>MOGE has published discretionary CSR expenses of the companies operating on their website. However, there were inconsistencies in the reporting templates, reporting periods, currencies etc. The other extractive sectors do not publish discretionary CSR expenses of the companies operating under them. There is no mandatory CSR expense at present other than MOGE's 2% Mandatory CSR</p>	<p>Agency Comments</p> <p>ME-2 Comments: Companies reported their CSR activities which were implemented until the current reporting period, and after contracting with the companies in accordance with 2018 Mining Rules, they will provide more accurate data.</p> <p>MOEE Comments: - For those projects operating and implementing the oil and gas works, the Corporate Social Responsibility (CSR) works are being performed by the companies in accordance with the guidelines given by the Myanmar Oil and Gas Enterprise (MOGE). The CSR programmes being implemented by the companies have been described and</p>	Ongoing	

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		<p>Expenditure.</p> <p>The government agencies should adopt a formalised reporting framework for the companies so that consistent information is available for reporting.</p> <p>There should also be full disclosure on the beneficiaries of mandatory CSR expenditure in accordance with EITI requirement 6.1 by the companies or SOEs.</p>	<p>presented in their annual reports.</p> <p>- For the systematic recording and performing of the CSR programmes done by the companies and the MOGE, Independent Administrator (IA) is requested to fix and provide the Reporting Framework and the coordinated performance must be made with relevant organizations for the similarity/uniformity of report in line with such framework.</p> <p>DOM Comments: In the past EITI Reports, it was described as it was presented by the company and if the contracts are to be signed and performed, the rules for CSR have already been prescribed according to the new Myanmar Mines Rules promulgated in 2018 in order to systematically manage the expenditures of Corporate Social Responsibility (CSR)</p> <p>MGE Comments: Regarding the Corporate Social Responsibility (CSR), it is fixed to use 2% of the total investment in the 2019 Myanmar Gems Law and it is being performed in inclusion of such provision in the Myanmar Gems Rules, which is under drawing.</p> <p>DGSE Comments: For adopting a formalised reporting framework for the companies' CSR activities, DGSE accepts it.</p>		
16	MSG	<p><u>EITI Reporting Period</u></p> <p>MSG should have early discussion to determine the periods to be covered for the next MEITI reports. (16)</p>	<p>Agency Comments</p> <p>MSG Decisions: According to 20th MSG meeting decisions number 13, regarding with the reporting</p>	Ongoing	

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		<p>In November 2017, the government announced a change in the Myanmar fiscal year to the 12 month period from 1 October to 30 September. The Union Taxation Law 2018 ("UTL 2018") which is effective from 1 April 2018 also sets out further guidance stating that for all taxpayers apart from the state-owned enterprises, the fiscal years shall be the period from 1 April 2018 to 31 March 2019, followed by 1 April 2019 to 30 September 2019 and only thereafter the government fiscal year is to be adopted starting from 1 October 2019.</p> <p>In view of the change in fiscal year and the different fiscal years for private companies and the government during the transition period (i.e. government fiscal period is from 1 April 2018 to 30 September 2018 followed by 1 October 2018 to 30 September 2019) the MSG should start early discussion on the periods to be covered for data reconciliation for future MEITI reports.</p>	<p>period for 5th MEITI report to cover 12 months or 18 months due to changes in fiscal year, it is decided that it need to consult with the International EITI Secretariat and tentatively it is decided to cover just 12 months due to the extension issues.</p> <p>After that, NCS consulted with the International Secretariat and they replied to us as follows:</p> <p>The international secretariat's advice on this matter is that the 5th Myanmar EITI report should cover the 12-month period from April 2017 - March 2018. This report will be due by 31 March 2020.</p> <p>After that, you have two options. You can either do a one-off report covering six months, and then move to the new calendar for the following reports. An alternative would be a one-off report covering 18 months, but with this option we will need to further discuss the deadline to make sure data submitted is not older than 2 years. We therefore suggest you go for the first alternative for the 6th Myanmar EITI report, which would then cover only six months.</p> <p>However, if you do go for a solution where the 6th report only covers six months, we suggest that for the procurement of the next IA you include (in the ToR ) that the same IA works on both the 5th and 6th report.</p> <p>In 21st MSG meeting conducted on 3 May 2019, MSG decided that 5th MEITI report to be covered only 12 months from 1 April 2017</p>		

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			<p>to 31st March 2018 and 6th MEITI report will cover only 6 months from 1 April 2018 to 30 September 2018 and then 7th MEITI report will be followed by 1 October 2018 to 30 September 2019 with the same Independent Administrator for 6th and 7th MEITI reports.</p> <p>MOPF Comments: It is to be carried out that all taxpayers will be levied taxes with effect from 1st October, 2019.</p>		
17	OAG	<p><u>Reliability of the data reported</u> According to EITI Requirements, the reliability of data is one of the critical points for the evaluation of a country's transparency and consequently one of the important criteria during the compliance process.</p> <p>The Office of the Auditor General do not publish any reports relating to audits carried out on Government Agencies. We requested audit reports from OAG for the Government Agencies involved in the extractive sector and these documents are not available for the public.</p> <p>With the purpose of ensuring the reliability of financial information relating to the extractive sector in accordance with international standards we recommend to review the regulation to make OAG reports publicly available in order to raise awareness and importance of the extractive sector in Myanmar.</p>	<p>OAG communicated to the IA all the audit reports of the Government Agencies and SOEs involved in the EITI process for the fiscal years 2014-2015 and 2015-2016.</p> <p>However, these reports are not publicly available.</p>	Partially	<p>Comments from OAG According to the Auditor General Law Article 11 (A), the Office of the Auditor General of the Union (OAG) has to submit the audited findings of financial returns/budget data in Pyidaungsu Hluttaw or Pyithu Hluttaw or Amyotha Hluttaw at least once a year. If there is any urgent thing, OAD reports occasionally.</p> <p>According to Article (O), OAG reports the audited activities to the President of the Republic of the Union of Myanmar at the same time to the Myanmar Union Parliament. The OAG send the report to the Public Account Committee (PAC). After the PAC has done the analysis, verification, and evaluation on the report submitted by OAG, the report will be published on the website of PAC <a href="https://pyidaungsu.hluttaw.mm/reports">https://pyidaungsu.hluttaw.mm/reports</a>.</p> <p>Regional/ State Auditor General reports to the Chief Minister of State/Region and the Regional Parliament as well.</p> <p>OAG follows the enacted Law, Rules and Regulations.</p> <p>Attorney General of the Union Law 2010 was amended in 2013, 2014 and 22-Jan 2018 in which last date Amendment of the Law Article 11 (A) &amp; (O), 25 (A) and 25 (D).</p>



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					<p>Likewise, occasionally, Regional/ State Auditor General reports to the Chief Minister of State/Region and the Regional Parliament as well.</p> <p>Recommendation made in the second and third reports, the Department of Internal Revenue has taken some actions to address the issue of deferred payment related to income tax payments. These actions are included in the comments sent by the Internal Revenue Department.</p> <p>OAG submit findings report to Government Departments in EITI process and State-owned Enterprises (SOEs). Even though, the Office of the Auditor General of the Union (OAG) do not publish the report to the public directly, OAG reports the information to PAC regularly and it will be published on the website of PAC. In addition, OAG participates in the press conference.</p>
18	IRD	<p><u>Delay in issuing CIT payment receipts</u></p> <p>CIT payment receipts are issued by IRD with considerable delay. In fact, extractive companies do not receive payment receipts upon money transfer. Payment receipts can be issued by IRD with a delay that can reach one month. The gap between the payment/transfer date made by the extractive companies and the accounting records of the IRD causes significant discrepancies in the reported data. Several companies reported CIT final payment for the year 2013-2014 and presented proof that transfers were made during March 2014. The IRD did not report these payments as receipts were issued during April 2014 which is outside the reconciliation period. We recommend that CIT payment receipts are issued upon receiving transfers from</p>	<p>IRD implemented some actions in order to address the issue of delayed payments receipts related to the payment of the Income Tax. These actions are described in the following IRD comment:</p> <p><u>IRD comment:</u></p> <p>IRD has made the following efforts to urge companies for tax compliance:</p> <ul style="list-style-type: none"> <li>- Informed to submit income declaration form</li> <li>- Invited for investigation in accordance with their annual tax payment</li> <li>- Checked the submitted reports</li> <li>- Asked to provide more information if required</li> <li>- If completed, calculated the amount for taxation (need to pass different levels of authorities)</li> <li>- Having calculated the amount to be taxed, recorded in a register and made entries in e-</li> </ul>	Ongoing	<p>Comments from IRD:</p> <p>March 2019 update:</p> <p>Current capacity levels within IRD present continuing challenges for timely processing. This will be further exacerbated by the need to process twice the volume of transactions as result of the introduction of a transitional six month tax year from 1 April to 30 September 2019. Present efforts to deploy a new IT system with operational effect from sometime in 2020 will drive a major overhaul of IRD processes and procedures for greater efficiency and improved processing timeliness. However this will present immediate benefits for those taxpayers operating under the Self-Assessment System. Expansion of this population will occur in the period 2020-22.</p> <p>2020 Update:</p> <p>No change except for the fact that implementation of the new IT system anticipated in the last report will now not</p>

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		companies. This will avoid cut-off errors in the reported data. IRD should review the process and identify weaknesses that causes the delay in producing the receipts.	RTS, issued Tax Requisition Form (Pa Ta Kha (oc)-(8) as per the provision 53 of the Income Tax Law and three-folds chalan for payment - Companies need to pay taxes at the respective Myanmar Economic Bank once they got a chalan. One piece of chalan is to be kept by the tax payer whereas the other one will be kept by the respective bank and the rest by the respective IRD office. If the tax payer paid the tax in foreign currencies in 2013-2014, they had to pay taxes at Myanma Foreign Trade Bank (MFTB) or Myanma Investment and Commercial Bank (MICB), then needed to forward the P.O to the respective IRD offices due to the fact that foreign currency accounts can't be opened up at those offices at that time. Only then has the P.O been received, the IRD offices issue a chalan which states equivalent kyats of cooperate income tax to be paid, whereby tax payers can deposit the tax amount as per the chalan at the nearest Myanmar Economic Bank. That's the main reason of why actual payment date and chalan issued date are different. However, after large taxpayers' office have been set up since 2015, unnecessary bureaucratic procedures are being cut off for tax payers to pay tax more easily.		occur with full functionality before 2024. Prior to that time, it is anticipated that around an additional 4,000 taxpayers will enter the self-assessment system from October 1. 2020.
19		<u>Future EITI scope</u> EITI requirement 4 requires the production of comprehensive EITI Reports that include full government disclosure of extractive industry revenues and disclosure of all material payments to government by oil, gas and mining companies. We make the following recommendations	The scope of the second and third Myanmar EITI reports was widen by the inclusion of payments from Gems and Jade sector beyond the emporium and the Oil and Gas transportation companies and by reconciling the production and exports data. We understand that Myanmar is preparing its First EITI forestry report as well.	<i>Partially</i>	Comments from MGE: In 4th MEITI report, the reporting template was filled up with allocation of permits, production, payment of jewellery tax, sales at emporium, permit order, in-kind share, social responsibility, income tax payment and environmental conservation. Also, details of UFA (OA)'s earnings and expenses with extended scope was included in the template.

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		<p>which MEITI could consider in this context:</p> <ul style="list-style-type: none"> <li>• Include the production in the reconciliation process;</li> <li>• extending the coverage of the Gems and Jade sub-sector revenues by including all revenues collected and not only those received from emporium; and study the possibility to include hydro, forestry, fisheries and others;</li> <li>• reconcile revenues collected by SOEs from companies with the transfers made by SOEs to the MoF;</li> <li>• extending the coverage of the report by reducing the materiality thresholds and by considering other relevant criteria for Gems, Jade and other minerals;</li> <li>• include transportation revenues in the reconciliation scope; and</li> <li>• disclosure of social expenditures desegregated by project and beneficiary;</li> </ul> <p>In setting its annual work plan, MEITI should cover the extractive sector in full and consider the progressive extension of the EITI scope.</p>			
20		<p><u>Definition of the Beneficial Ownership</u></p> <p>The 2013 EITI Requirement recommends that beneficial owners of companies which bid for, operate and/or invest in the extractive industries are made public (see below for EITI standard provisions on beneficial ownership). This is a mandatory requirement for government and state owned enterprises, and could become a requirement as from 2016 for private or unlisted public companies, including partners in joint ventures.</p> <p>Myanmar does not currently have a</p>	<p>A definition of Beneficial Owners (BO) and Politically Exposed Persons (PEP) has been set up by MSG for the 2nd and 3rd MEITI reports. The extractive companies include in the scope of reconciliation of these reports have requested to disclose information about BO and PEP. However, MSG decided hat this disclosure is voluntary.</p> <p>We noted that all the companies (when applicable) failed to disclose information about BO and PEP in their reporting templates.</p> <p>There is no register of Beneficial Owners in</p>	<i>Partially</i>	<p>Comments from MGE:</p> <p>Five gems companies were part of BO pilot project. Two MGE officials are currently involved with the BO Task Force. There is collected the information of 84 companies via BO onlne form which are included in the 4th MEITI reports.</p>

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		<p>publicly available register of the beneficial owners of the corporate entities that bid for, operate or invest in extractive assets. A brief on the proposed definitions for Beneficial Ownership and Politically Exposed Persons was circulated to Steering Committee members at the MEITI scope validation meeting but has yet to be further discussed at the Committee level.</p> <p>The appropriateness of the beneficial ownership definition proposed in the scoping report needs to be addressed by the MSG on the basis that EITI multi-stakeholders will give their feedback in order to agree the percentage shareholding in a company that a person has to hold or controls in order to qualify as a beneficial owner and take necessary action to implement the beneficial ownership reporting process. The MSG should also agree whether Politically Exposed Persons, who otherwise benefit financially from the company, are also considered to be beneficial owners.”</p> <p>In this connexion and after agreeing the BO definition and reporting process, we recommend that MEITI Secretariat should ensure that reporting entities are made aware of the importance of the BO declaration. Particular attention should be given to the ownership of companies which are not owned by listed companies or SOEs.</p> <p>Furthermore, we strongly recommend that training should be provided to companies on BO reporting requirements. During training, the BO template should</p>	<p>Myanmar. MOGE comment: A consultative workshop was organized in Novotel Hotel on 23rd and 24th of March 2017 and international companies were also invited to submit their expression of interest for the beneficiary ownership.</p> <p>DICA comment: - Disclosing the information of an approved investment project at <a href="http://www.dica.gov.mm">www.dica.gov.mm</a> within 24 hours after the MIC meeting that approved the project, organizing a press conference, uploading investment information by sectors as well as by countries are being conducted. - List of companies registered at DICA is also being uploaded in the DICA's website (<a href="http://www.dica.gov.mm">www.dica.gov.mm</a>). - The DICA is coordinating with Mspiral International Design and Web Development Agency for the betterment of the DICA's website thanks to the supports of GIZ. - There is no separate section yet at DICA for registering beneficial owners of the cooperate entities. - According to provision 38 of the Myanmar Investment Rules (MIR) enacted on 30th March 2017, it is mentioned that an investor needs to submit a summary of proposed investment in which it is a must to include information regarding the investor and any other person holding a significant direct or indirect interest in the investment and provide other information as directed by the commission if necessary. - The provision 45 of MIR also states that the commission can publish the summary of the</p>		

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		be presented and instructions and guidance notes should be provided for the preparation of BO declaration. It is also recommended that MSG launches a consultation with Government along with extractive industry companies engaged in the country to agree a standard format for companies to display, substantiate and update ultimate beneficial ownership information according to EITI Requirement 3.11. For this purpose, the MSG could consider the setting up of a sub-committee in which Civil Society Organisations, regulators, companies, experts and other stakeholders are represented. This committee will allow for an exchange of information on the effectiveness and future developments of disclosure rules and regulations.	proposal for public awareness. - In addition, the provision 199 of MIR also calls for publication of an annual report submitted by an investor within three days after submission on the investor's website or DICA's website for public information. MONREC comment: In order to submit a beneficial ownership (BO) road map to the international EITI secretariat office on 31st of December 2015, a road map was drafted in a workshop with the presence of the government, the civil society (MATA), the private sector (MFMA) and Natural Resource Governance Institute (NRGI) on 15th of December 2016 at Royal ACE Hotel in Naypyidaw. The draft BO road map was then reviewed in a two-day review workshop organized at Novotel Hotel in Yangon in last March (23-24 March 2017) by presenting all important stakeholders such as the government, MATA, MFMA and NRGI together with Ms. Gay from EITI secretariat office and Ms. Shona from the World Bank, so as to have the road map finalized. In addition, the ministry is also negotiating with subcommittee and MSG in order to hire a BO Consultant.		
21		<u>Military holding companies</u> The EITI Standard requires the disclosure by SOE(s) their quasi-fiscal expenditures such as payments for social services, public infrastructure, fuel subsidies and national debt servicing and to develop a reporting process with a view to achieving a level of transparency commensurate with other payments and revenue streams, and which should include SOE subsidiaries and joint ventures. SOEs are	MEC has been selected in the reconciliation scope of the 2014-2015 and 2015-2016 MEITI reports in application of the materiality thresholds described in the Section 4 of this report. Payments received from UMEHL will be included in the report through unilateral disclosure from Government Agencies and SOEs. However, MSG may consider Military Holding companies and their subsidies as specific	Ongoing	Comments from MGE: Union of Myanmar Economic Holdings Limited (UMEHL) and Myanmar Economic Corporation (MEC) are involved in gems extractive industry. They were part of the scoping study from FY 2013-14 to FY 2016-17 and filled up the reporting templates and also include in scoping study of FY 2017-2018.

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		<p>also required to disclose their level of beneficial ownership in mining, oil and gas companies operating within the country's oil, gas and mining sector, including those held by SOE subsidiaries and joint ventures, and any changes in the level of ownership during the reporting period.</p> <p>We understand that the two large military holding companies, UMEHL and MEC, hold important positions in Myanmar's economy, including in the mining and gems sectors. We also understand that these two conglomerates which report to the Directorates of the Defence Services are organised under laws which provide protections and privileges to state-based companies. We also understand that until 2014, these companies were exempt from certain taxes and contributions applied for private mining companies.</p> <p>We recommend to address the issue whether UMEHL and MEC should be treated as SOEs for the next EITI Report and included in the scope, irrespective of the materiality threshold. Accordingly, these companies will be required to disclose:</p> <ul style="list-style-type: none"> <li>· prevailing rules and practices regarding their financial relationship with the government;</li> <li>· level of beneficial ownership in mining, oil and gas companies;</li> <li>· payments and contribution to the national budget;</li> <li>· their quasi-fiscal expenditures such as payments for social services, public infrastructure, fuel subsidies and national</li> </ul>	<p>entities which are risky and therefore should be subject to higher level of scrutiny, including request to submit an auditors' specific attestation, specific interviews, and / or analysis and auditing of specific transactions within their accounts.</p>		

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		debt servicing; and · transactions relating to loans or loan guarantees granted to mining, oil and gas companies operating within the country.			
22		<p><u>Publication of statistics and information on the extractive industry</u></p> <p>The EITI standard stipulates the disclosure of contextual information and regulations in the extractive industry, including the disclosure of:</p> <ul style="list-style-type: none"> <li>· an overview of the extractive industry in terms of reserves, regions, current structure and size, significant exploration activities etc.;</li> <li>· contribution to the economy in terms of employment and export levels;</li> <li>· government revenues generated by the extractive industry and funds earmarked for specific programmes / geographic regions and sub-national transfers; and</li> <li>· public information on license allocations, register of licensees, beneficial owners, contract terms, etc.</li> </ul> <p>Currently, Myanmar EITI Secretariat does not have a comprehensive database including extractive operators, contextual information and statistics on the sector. The contextual information in this report was collected from dispersed sources and meetings held with Government Agencies. Most of the information collected is not available to the public. Some analyses were limited due to the lack of statistics in the sector such as employment. We also noted that many figures such as exports and production vary from one source to another (See Section 3.11 of this report).</p>	<p>Except the information communicated for the purpose of preparation of the 2nd and 3rd MEITI reports, we did note any progress in the publication of contextual information related to the extractive sector by the Government Agencies.</p> <p>MOGE comment: The Myanmar Investment Commission has already enacted the Myanmar Investment Law, in which how employment shall be done by investors to have a balance between international and local personnel is explained. Besides, taxes gained from extractive companies and SOEs are being paid to the Ministry of Planning and Finance on a monthly basis as well as an annual basis whereas those facts and figures are also being publicized through CSOs.</p> <p>MONREC comment: The statistics and information regarding the government revenues generated from the extractive industry and funds allocated for separated plans; license allocations and registration; law, related rules, orders and instructions and sample contracts have been sent to Moore Stephens that will do independent reconciliation for the second MEITI reporting. That information will be officially disclosed to the public once through organizing press conferences and launching event. In addition, the website (<a href="http://www.mining.gov.mm">www.mining.gov.mm</a>) has been being</p>	No	<p>Comments from ME1: Regarding with the publication of statistics and information on the extractive industry, the production data, permits, and lists of blocks related with No.1 Mining Enterprise are published on department website.</p> <p>Comments from MGE: In order for a mineral cadastre system, the Mineral Cadastre Working Group led by the Department of Mines was formed and trainings are underway. Two MGE officials are in the Working Group. A jade website, <a href="http://www.openjadedate.org">www.openjadedate.org</a>, was completed with the cooperation between the MGE and Natural Resource Government Institute (NRGI) and launched in Yangon in May 2018. It is publicly available now.</p> <p>Based on the nature of gemstone sector in Myanmar, the Supporting Committee on gems sector will pay attention to Policy Making Theory that incorporates the following points.</p> <p>(A) Agenda setting/ Identification of issues or problems) (B) Policy formulation (C) Policy adoption/ legitimization (D) Policy implementation (E) Policy assessment/ evaluation</p> <p>Plans on Myanmar gemstone policy monitoring and evaluation, and implementation will be included in Chapter (5) and (6) of the Myanmar Gemstone Policy.</p> <p>Comments and suggestions are being requested on 36 policy statements of the Myanmar Gems Policy, which have been approved as final draft.</p> <p>Comments from DOM</p>

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		<p>In order to enhance the integrity, accuracy, reliability and accessibility of contextual information, we recommend that MEITI Secretariat, MoM, MoE and CSOs publish contextual information at least annually including: the industry potential, the contribution to the economy, the strategy for the sector, relevant events and facts, current regulations and upcoming changes, amongst others.</p> <p>We also recommend that the MSG assists the EITI Secretariat with adequate resources in order to consider implementing reporting requirements that are similar to the international directives regarding accounting and transparency.</p>	updated with statistics of cadastral mines licensed by the ministry since May 2015.		<p>Although there is no publication on statistics and information on the extractive industry, state-owned enterprises of Ministry of Natural Resources and Environmental Conservation (MONREC) such as Mining Enterprise 1 (ME1) and Mining Enterprise 2 (ME2) upload and update their production data and open tender system on the website of <a href="http://www.mining.gov.mm">www.mining.gov.mm</a> monthly and on a year basis. The statistics and information regarding the government revenues generated from the extractive industry and separated plans allocated from Other Account (OA); license allocations and registration; law, rules, regulations, orders and instructions and sample contracts have been sent to Moore Stephens through MEITI-NCS for 2nd and 3rd MEITI reports. As the press release and report launches for the 2nd and 3rd MEITI reports have been done, the public awareness has been raised. The up to date information on the mining area lists and data are published on the Ministry's website <a href="http://www.mining.gov.mm">www.mining.gov.mm</a> since May, 2015. The initial registration team accepted the mineral areas application since 1-8-2018 and the application lists are published up to date on <a href="http://www.mining.gov.mm">www.mining.gov.mm</a>.</p>
23		<p><u>Register of licenses</u></p> <p>The EITI Standard requires implementing countries to maintain a publicly available register or cadastral system including comprehensive information regarding each of the licenses pertaining to companies covered in the EITI Report. This register should cover the following information:</p> <ul style="list-style-type: none"> <li>i. license holder(s);</li> <li>ii. coordinates of the license area;</li> <li>iii. date of application, date of award and duration of the license; and</li> <li>iv. in the case of production licenses, the commodity being produced.</li> </ul> <p>We noted that the current permit register</p>	The progress on the implementation of unified Mineral Cadastre System is described in the Section 3.3.16 of the report.	Ongoing	<p>Comments from ME1: In register of licenses, MONREC initiate for the implementing Mineral Cadastre System under the management of Ministry.</p> <p>Comments from MGE: Myanmar Gemstone Law was enacted on January 30, 2019 and the development of Myanmar Gems Rules are in process. After that, the MGE will follow in accordance with rules. MGE publicized the licencing procedure on public newspapers and ministry website. There is included the assigment of blocks licencing procedure in Myanmar Gems Rules which enacted on 30th January 2019. MGE is only accepted the blocks closure which are jointly extraction with government after the mine closure plan report submitted.</p> <p>Comments from DOM</p>



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		has the following weaknesses: i) it is not available online; ii) transfers of mineral rights are not computerised; iv) intensive manual manipulation required to extract the list of licenses; v) licences are not systematically pre-numbered. We recommend that the Mining Cadastre ensures that all records are computerised and kept up to date. This would then allow the generation of reports of all licensed operators with relevant details. An online cadastral system should be installed, which includes information on coordinates of concessions and transfers of mineral rights as well as fees paid. The MoM and the MoE should have official online cadastre maps with details of licences.			The consultant Mr. Enrique Ortega was hired with the World Bank's funding in order to establish the Mining Cadastre System for Myanmar EITI process for 2017-2018 Fiscal Year. He visited to Myanmar three times and has performed the consultation for Mining Cadastre process and presented the recommendations. According to his recommendations, the Pre Cadastre Working group was first established with (11) staffs and Mr. Chorn Nak was hired as the consultant. The Mining Cadastre Working Committee of the MONREC, including the (9) senior officials, is established and led by the Director General of the Department of Mines (DOM) under the notification no. (13/ 2019) dated 17-1-2019. Comments from MOEE: The JV companies working on the onshore/ offshore Oil fields are permitted with Myanmar Investment Commission (MIC) Permit, not under licensing system.
24		<u>Government accounting systems</u> During the reconciliation work, we noted that government accounting systems are not always set up in such a way that it is easy for Government Agencies to provide information required for EITI purposes and to report on a timely basis. The records in departments and SOEs under the MoF, the MoM and the MoE are kept using manual systems. This made the collection of information time-consuming and prone to error. It also makes management of the information and the control over Government revenues more difficult. Government Agencies do not use Tax Identification Number. Payments are recorded in most cases using companies' names. In several instances, we noted that payments were allocated to the	Many reforms with relation to the government accounting system are being implemented by the different Government Agencies. These reforms are as follows: IRD comment: A reform process is being undertaken in IRD to have a modern and effective tax management system installed since 2012 with the supports of international organizations such as IMF, World Bank, ADB, ITIC, JICA, OECD and OTA (USA). Two strategies employed in tax reforms include the transformation of taxation system from OAS to SAS, and from current commercial tax system to value added tax system. Similar to other countries, large taxpayer office (LTO) has been set up to enhance transitions towards SAS system since 1st April 2014 and a counsellor from USOTA has been recruited to help the system be in place. Based on the	Ongoing	Comments from ME1 : For Government Accounting system, ME 1 does not have comments because the Ministry have submitted the implementation progress. Comments from MGE: Starting the 56th Myanma Gems Emporium in 2019, jades lots for display/ sale are only accepted with company names under the company registration list of Directorate of Investment and Company Administration (DICA).  Regarding license allocation and registration, the list of worksites that are considered vacant after the end of permit duration is uploaded to <a href="http://www.mining.gov.mm">www.mining.gov.mm</a> and <a href="http://www.mge.gov.mm">www.mge.gov.mm</a> on monthly basis.  Information on production and sale is being computerized.  Comments from IRD:  March 2019 update:

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		<p>wrong company because the company name was misspelt or because the company name is similar to other companies. This renders the identification of payments per company laborious as payments can be made by other entities on behalf of the company.</p> <p>We recommend that the Government introduces appropriate computerised systems to record and control information relating to taxation and revenues. We also recommend that the Myanmar Tax Authorities (IRD and Customs Department) implement the use of Unique Tax Identification Numbers for all taxpayers in order to avoid unnecessary confusion and mistakes. TIN would also lead to information being reported reliably and efficiently.</p>	<p>suggestions of international experts from LTO, taxpayer identification numbers (TIN) have been issued using tax revenue management software (TRMS) as taxation software is not yet ready. Likewise, TINs have been granted to medium taxpayers as well from medium tax payer office (MTO). Besides, TINs are being issued to tax payers who want to start using SAS system in accordance with the tax they pay. In order to develop a digital taxation system, IRD is preparing to procure integrated tax administration system (ITAS), which is a commercial off-the-shelf taxation system based on international taxation standards, with the World Bank loan and supports for Myanmar modernization of public financial management project (M-MPFMp) and with the technical expertise being provided by the tax administration and IT experts from the World Bank and IMF. Electronic taxpayer registration system being part of the ITAS, transitions towards the employment of TIN could be properly implemented in accordance with the tax reform plan.</p> <p>MOGE comment: MOGE has started using a computerized accounting system for salary payments and store accounting in the Head Office and the offices in Yangon Region. When the Naypyitaw Head Office uses a computerized accounting system for monthly reporting of cash budget, commercial budget, trial balance, etc., to the higher authorities and in preparing annual balance sheet, field offices can only employ a computerized accounting system for other accounts rather than salary payments and store accounts.</p>		<p>In collaboration with DICA, unique taxpayer identification numbers are now issued to all corporate taxpayers. IRD has commenced the process for configuring and deploying its new IT system which will support its transition to a modern tax administration. However, taxpayers will not experience the effects of this reform before 2020.</p> <p>2020 update: See earlier comments - the new core IT system in IRD will not be fully functional before 2024.</p> <p>Comments from DOM The Fiscal Modeling Workshop was held with the collaboration of DOM and Natural Resource Governance Institute (NRGI) to have the accurate tax for the State, to be more beneficial in comparing the projects including the production expenditures, to record the information related to the revenues. Under our Ministry, the communication between departments has been done via the online system, e-government system, computerized database and the departments are cooperating to implement the Mining Cadastre System.</p> <p>Comments from Customs: 1. Regarding export/import under the Myanmar Custom Department, a good international practice: Myanmar Automated Cargo Clearance System (MACCS) was initially implemented in Yangon area and Myawaddy Trade Zone in November 2018 and June 2018 respectively. The import companies have first to do User Registration on MACCS. When require documents are completed, Importer/Exporter Codes (IE Code) are issued to the companies. Those IE Code represents individual company like TIN. If the company list (scoping study) is matched with IE Code for the purpose of reconciliation in the forthcoming EITI report, the company name, tax revenue, and reference will be easy to identified specifically and able to avoid misleads and complication. As Myanmar Custom Department, it will be budgeted to change from</p>

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			<p>DICA comment: With regard to the introduction of an appropriate computerized system, information of the companies registered at DICA are being recorded using a company registration software developed by Myanmar Information Technology Co., Ltd. DICA is coordinating with the ADB to implement an electronic registry system. DICA is working closely with Data Focus Co., Ltd. to be able to set up an investment database starting from the budget year 2017-2018.</p> <p>In addition, a FDI Pilot Survey is being conducted in order to have a reliable information with the financial supports of EU-ASEAN COMPASS and the technical supports of IMF.</p> <p>Capacity building trainings are also being provided to the staff for documentation and database development.</p> <p>MONREC comment: Since it is planned to include the information about computerized mining cadaster (MCS) that can record all license information in one place in the second MEITI report, the World Bank has committed to support one million dollars for MEITI implementation in 2017-2018. Evidently, the ministry has learnt that one million dollars has now been budgeted by the bank for MCS. At the same time, Mr Morten Larsen, a mining specialist, and Mr. Jesus Jose Artieda, GIS &amp; Cadaster Consultant from the World Bank visited to the ministry in last October 2016 and conducted a pre-feasibility study for a week in order to implement MCS. In addition, Mr. Morten Larsen and Mr. Chorn Nak, a mining</p>		<p>currently using IE Code to TIN using in the other departments then it will be more accuracy.</p> <p>2. Furthermore, please be informed the implementation updates on the recommendations such as if Myanmar Custom Department built a specific database upon the company list (scoping study), it can only be a small change and it can provide accurate data on timely basis.</p> <p>Comments from MOEE: MOGE has started using the computerized database for staffs' salaries and store accounting list for the Nay Pyi Taw Headquarter and the Yangon Branch.</p> <p>In Nay Pyi Taw Headquarter, the computerized database is used in monthly reporting to the senior officials for the monthly cash budget, the commercial budget and the financial statement, and recording the yearly financial statement. However, in the regional branches, the computerized system is used for other lists rather than salaries and store accounting.</p>

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			cadaster specialist and consultant, visited again and discussed about MCS at the Department of Mines on 8th of August 2017 and subsequently conducted a knowledge sharing workshop on the following day, followed by a meeting with the responsible ministerial officials on 11st. Moreover, the ministry is actively participating in sub-committee and MSG to be able to recruit an international mining cadaster consultant.		
25		<p><u>Budget comprehensiveness and transparency</u></p> <p>The EITI standard requires that the EITI Report should indicate which extractive industry revenues, are recorded in the national budget and whether these include cash or in-kind payments. When revenues are not recorded in the national budget, the allocation of these revenues must be explained.</p> <p>According to the Union budget for the year 2013/2014, the revenues are detailed by source such as revenues from Ministries and department revenues, State Owned Enterprise Revenues and NPT development committee.</p> <p>The Union budget for FY2013/2014 does not show specific line for the extractive sector revenues. Figures mentioned for each ministry or SOEs are detailed by sector or activity and include total revenue collected from all sectors. As a result, we were not able to determine the contribution of the extractive sector in the State revenues. Furthermore, there is extensive use of "other accounts" in the budgetary system in Myanmar. These 'other accounts' are essentially accounts</p>	<p>The Union Budget Law does not include details related to the revenues from extractive sector and information about the Other Accounts. However, we understand from the below comments from MoPF that these information are included in the Citizens Budget.</p> <p>MoPF comment:</p> <p>The department expressed its receipt (In Cash) and the material collected by (In Kind) from the mineral resource extractive industries in the Current revenue account issued in the annually published Union Budget Law.</p> <p>According to annual Union Budget Law, the revenue of mineral resources extractive industries sector do not mention a specific topic. However, the related revenue &amp; expenditure of mineral resource extractive industries are expressed in details in Citizens Budget (Citizen's Budget) publication which is intended for citizens to ensure open and transparent Budget and to know the revenue of the extractive industries sectors.</p> <p>The status of the purpose of opening OA Account, the opened patterns of OA Account, the expenditures incurred from OA Account, the payments to OA Account are expressed</p>	Partially	<p>Comments from Budget Department:</p> <ol style="list-style-type: none"> <li>1. Regarding to the recommendations on comprehensiveness and transparency of Budget for 2013-2014 EITI Report, the extractive industries State-owned Economic Enterprises (SEEs) current revenue was released in MMK that was received not just for In Cash but also In Kind in accordance with the Annual Union Budget Law and Other Accounts were also published in the Citizen's Budget 2016-2017 to promote budget Transparency.</li> <li>2. Regarding UFO-OA of SEEs, "Public talks on Myanmar Economy" led by Deputy Minister of MOPF were Brocasted in the MRTV and released on daily newspapers to ensure public understanding.</li> <li>3. It is to be informed that with regard to the current actions on Other Account balance per book-keeping standards, the work-in progress are being implemented with the decision of National Economic Coordinatiing Committee (NECC) with approval of Union Government.</li> </ol>

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		<p>held by ministries and SEEs at the Myanmar Economic Bank (MEB) for management of their own resources. Functioning modalities and use of these accounts were not provided to us. As a result we cannot provide explanation on rules and practices governing transfers of funds between the SOE(s) and the State, retained earnings, reinvestment and third-party financing as requested by Requirement 3.6 of the EITI Standard. In order to improve the transparency and comprehensiveness of the budgeting process, we recommend that the Ministry of Finance considers whether own-source revenues from extractive sector could be redefined as normal budgetary revenue and whether more information need to be disclosed with regards to “other accounts” in the budget.</p>	<p>with the title of financial management of State-Owned Enterprises and other information related to accounts published in the Citizen's Budget plan (2016 - 2017) for the clear public understanding. Regarding the recommendation on the revenue from mineral resource extractive industries, it should be separated and should be described with the title of Normal budgetary. Although the revenue of the State-owned enterprises (SEEs) working as the mineral resource extractive industries displayed together, the revenues details of annual current budget submitted to Ministry of Planning and Finance are listed by title of sale revenue, dividends revenues from the service of partnership contract.</p> <p>Budget Department comment: Incomes, either in-cash or in-kind, from the extractive industries gets published as normal incomes in Union Budgetary Law, which is published every year. The yearly published budgetary law hasn't yet elaborated the detailed headings of extractive industries from which the incomes were generated. However, Citizen's Budget, that is published to improve budget transparency by highlighting how extractive industries play a role in nation's income, entails incomes and expenditures regarding those extractive industries. To enhance peoples' understanding, information regarding OA Accounts such as the purposes of opening up OA Accounts, the status of those accounts set up so far, the settlement of expenditures from those accounts and how incomes are remitted into</p>		

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			the accounts is clearly mentioned with the title namely 'Financial management plan of the State Owned Enterprises (SOE)' in the Citizen's Budget published in 2016-2017. With regard to the recommendation 'to make a separate reporting on incomes from extractive industries as normal budget', though the SOEs doing extractive industries illustrate collective incomes in Union's Budgetary Account, they entail separate incomes items such as sale incomes, benefit shares from joint venture and other incomes in the Normal Budgetary Account, that needs to be submitted to the Ministry of Planning and Finance every year.		
26		<p><u>Enactment of EITI reporting regulations</u> EITI is established by the Presidential Decree 99/2012 of December 2012 which formally established EITI and states the Government's intention and commitment to implement EITI.</p> <p>However, we understand that the EITI reporting obligations are not covered by any other Law organising the process of collection in the current Legislation. This is one of the main reasons which led to delays to submit EITI reporting templates by some extractive companies and also the lack of contextual information's covering the extractive sector in Myanmar.</p> <p>We recommend to develop a legal framework for EITI in Myanmar including an EITI law that can be harmonised with existing legislation. The law can include provisions relating to:</p> <p>§ reporting obligations for extractive companies and Government Agencies</p>		No	<p>Comments</p> <p>The MEITI Work Plan includes the following two activities:</p> <ul style="list-style-type: none"> <li>• Research to recommend legal options to EITI institutionalisation; and</li> <li>• Developing a draft EITI Law or amendments to Sectoral Laws.</li> </ul> <p>The 11th MSG meeting held on 14 and 15 February 2018 decided to conduct a review of the existing policies and legislation to explore formulation of EITI policy and legislation. The draft TOR for this project was prepared and discussed at the 12th MSG meeting held on 16 March 2018 and sub-committee meetings. There are more than 40 policies and legislations related to Extractive Industries. Technical and Reporting Sub-committee conducted on 11 March 2019 was done in order to finalize the ToRs for Report on Legislative Institutionalization of EITI in Myanmar and reviewing of existing policies and legislation will be organised in 2020.</p> <p>The amendment for existing laws as well as promulgation of new law is being undertaken at the Parliament. Recently amendment for Environmental Conservation Law was initiated at the Phyithu Hluttaw (Lower House). The developing a draft EITI Law or amendments to Sectoral</p>

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		alike, while specifying the level of disaggregation of the data to be submitted; and § a time schedule for updating and publishing forms and instructions and selection of the reporting entities and submission of declarations and completion of all reconciliation work.			<p>Laws will be undertaken after reviewing the existing policies and legislation.</p> <p>In addition, the Cabinet of the Government of the Union of Myanmar issued a notification dated on 29 June 2018 to support the implementation of MEITI process.</p> <p>It states that “MEITI is a process that supports the country economic policy to raise financial resources with strong and transparent public financial management system. Furthermore, respective ministries, State and Regional Governments, private sectors and civil society organisations were being urged to participate deeply in MEITI process as a mainstreaming because MEITI is implementing practical, beneficial and sustainable forwarding reform actions for the country and public. Therefore, respective Union Ministries, State and Regional Governments, union level government organisations were being urged to cooperate with MEITI Leading Committee, Working Committee, MEITI Multi-stakeholder Group and National Coordination Secretariat office in order to implement MEITI process and activities for sustainable development of Myanmar.”</p> <p>MGE Comments:</p> <p>May 2018 Starting in January, the Central Committee's budget committee UFA (OA) has been transformed into the Union Fund (another list) and the annual audits are being reviewed by the Union Auditor General's Office.</p> <p>Preparing for MGE's Annual Report Release in collaboration with NRG. Licenses, the list of blocks that have been expired and licensed as a free-standing block is published monthly at <a href="http://www.mining.gov.mm">www.mining.gov.mm</a> and at <a href="http://www.mge.gov.mm">www.mge.gov.mm</a>. Press release on relevant Regions / States Timely issues of the exhibition.</p> <p>To have access to natural resources in the long-term sustainable mining production projects in the areas of the Department of gems and jade mining companies the ability to affect the environment, than the economic benefits that result from more preferential conditions based on the environmental impact assessment report</p>

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					EMP -Environmental Management Plan to Lone Khin/ Hpa-Kant gems track activity has occurred to maintain the environmental damage from South Australia Valentis & Coffey Co. Lead by local company Geosystems Engineering Myanmar Company. Participate in the development of the EMP -Environmental Management Plan and the private companies are preparing the EMP and submitting the requirements to the Department of Environmental Conservation and the requirements of the project. In the future, the companies will be required to submit the Initial Environmental Examination (IEE) for the mining concessions. EMP presentation will be conducted.
27		<u>Allocation of licenses</u> The EITI standard requires the disclosure of information related to the award or transfer of licenses pertaining to the companies covered in the EITI Report, including: a description of the process for transferring or awarding the license; the technical and financial criteria used; information about the recipient(s) of the license that has been transferred or awarded, including consortium members	We understand that the new Gemstone Law (actually drafted) will include the procedures for awarding licenses for exploration and production. MONREC comment: First come first serve policy is employed in awarding licenses for exploration of minerals. However, an auction system is practised to award licenses if the proposed exploration areas fall into an area with certain mineral reserve, upon which many	Ongoing	Comments from ME1  For license allocation, applications of license are accepted since 27th July 2018 in accordance with Mining Rues 2018. Comments from MGE: It will be carried out in accordance with Myanmar Gemstone Law enacted on January 30, 2019 and coming rules. There is not issued the licence of new blocks from FY 2016-2017. Comments from DOM:



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		<p>where applicable; and any non-trivial deviations from the applicable legal and regulatory framework governing license transfers and awards.</p> <p>The mining legislation does not precise if bidding procedure is to be applied for the award of licences or permits or the application of the principle of “first come, first served”. However, the right to the production permit is guaranteed in case of the discovery of a deposit by the holder of prospecting permit.</p> <p>We recommend that the MoM reviews the current legislation to state clearly the process used for awarding licenses and when a round of bidding should be conducted with the highest bidder obtaining the concession. This will ensure transparency and could also generate higher revenues.</p>	<p>investors are of interest. On the other hand, according to the provision 25, Section A of the Myanmar Mines Rules (1996), the ministry shall grant a large scale mine production permit if the application is made by a holder of mineral exploration permit. An auction system was once used in awarding licenses for mineral exploration. However, license renewal and awarding of new licenses have been suspended for the time being. On the other hand, the ministry is planning to include the procedures for awarding licenses for exploration and production in the new gemstone rules that is currently being formulated.</p>		<p>The mining licenses are permitted in accordance with the amended law of the Myanmar Mining Law published on 24-12-2015 and the newly Myanmar Mining Rules published on 26-7-2018. The mineral study permit is processed with the First Come, First Served system. The areas with the certain production of mining ore which have high interest rate are permitted with the bidding system. In the section (34) of the newly published Myanmar Mining Rule, it is mentioned that if the person who has the mining study permit has applied in accordance with the permit rules and regulation, the large-scale mining or the medium-scale mining permit can be authorized. It has been mentioned in details under the section 155 of the newly published Myanmar Mining Rules regarding the licenses transfers in mining sector and it is allowed in accordance the section (157) of that Mining Rules. However, transfers of license is not allowed under Myanmar Gems Law in gems and jade sector.</p> <p>Comments from MOEE: The JV companies working on the onshore/ offshore Oil fields are permitted with Myanmar Investment Commission (MIC) Permit, not under licensing system.</p>
28		<p>Confidentiality provisions in PSCs</p> <p>The model PSC used by MOE contains confidentiality provisions preventing public disclosure of information relating to Oil &amp; Gas operations by both parties (MOGE and the operators). This issue was addressed by the MOGE before the reconciliation stage by providing to each company selected in the scope a letter of consent allowing them to disclose information about the amounts paid to MOGE and the MoF</p> <p>However, over the long term such provisions should be amended to allow disclosure for EITI purposes and include an</p>	<p>MOGE comment: MoEE will disclose confidential contract information once both parties (MOGE and its contractors) agree to do so even though PSCs between them usually contains confidentiality provisions preventing public disclosure of contract information. The MOEG also provided that information when the first MEITI report was being prepared.</p>	Yes	

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		EITI reporting obligation on the operators and MOGE. These amendments should be considered for the forthcoming contracts and those currently being negotiated.			
29		<p><u>Strengthening transparency at the subnational level</u></p> <p>We understand that there is no regulation or procedure allowing the distribution of extractive revenues to region/states and local population in Myanmar. We also understand that the influence of illegal mining in the regions is particularly problematic in terms of negative health impacts and environmental effects, poor safety standards and monitoring, and in some cases human rights violations. In order to strength transparency and promoting good governance in extractive sector, we recommend to review the mining regulation in order to setup a fair revenue sharing mechanism of extractive revenues between central and local level. It is also useful to reflect the establishment of subnational EITI units in mining regions/states such as Mandalay and Magway regions and Rakhine and Shan states. This process can provide a valuable forum for dialogue at the state/regional level on the distribution/collection of extractive revenues and environmental and social issues associated with the extractive industries. We also recommend the involvement of General Administration Department (GAD) in local resource management, which can further improve local efforts to increase transparency.</p>	<p>MONREC comment:</p> <p>The Table 2-F of the 2008 constitution defines the rights of state and regional governments and those have been enacted in the provision 6 and 10 of the amended Myanmar Mines Law (2015). The Law Amending Myanmar Gemstones Law Rules is currently being discussed at the Hluttaws and the ministry is trying to enact a new mine rules.</p>	Ongoing	<p>Comments from ME1:</p> <p>In Strengthening transparency at the subnational level, the Mining Rules (2018) was stated the permission for management on small and medium mining fields for regions and state and it was started for implementation.</p> <p>Comments from MGE:</p> <p>Since January 2018, Central Committee Account has been renamed as UFA (OA) and its annual account has been audited by the Office of the Auditor General of the Union (OAG).</p> <p>To sustain natural resources, the MGE has asked extractive companies to develop the environmental management plan (EMP). In doing so, an EMP for Lonekin/ Hpakant area is jointly developed by the Australia-based Valentis &amp; Coffy Co. in partnership with Geosystems Engineering Myanmar Co. for the conversation of environmental damages caused by jade extraction there. Private companies also prepared EMPs for their mining sites and submitted to the Department of Environmental Conservation for necessary amendments. In future, companies that are granted permits for gems extraction will be asked to prepare and submit initial environmental examination (IEE) and EMP.</p> <p>Comments from DOM:</p> <p>In accordance with the table (2-F) of the 2018 Constitution, the states and regions have the right for the distribution of the revenues from the exctractive sectors. It is also stipulated under the section (6) and (10) of Myanmar Mining Law 2015. The respective states and regions are working on the publishing the law. The Sub-national Coordition Units (SNUs) are established to promote the cooperation of the states and regions. The SNUs have been formed in Mandalay, Sagaing, Magway and</p>

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					Shan State, and the formation of SNUs in the rest of states and regions will be processed.
30	IRD	<p><u>Strengthen the institutional capacities of the IRD</u> Myanmar has significant mineral and other natural resources which are being extracted widely. However, these resources contributed only about 17.8% of total revenue in 2015-2016. The Asian Development Bank (ADB) estimates that its revenue to GDP is 4.0% in 2011-2012, which is well below the region average and even below the fragile states average of 22%. Potential revenue from minerals is lost due to: · weak mineral and other extractive industries revenue collection capacity at the IRD; · weak mineral and extractive industries revenue policy analysis and revenues forecasting capacities at MoPF; · weak capacities to monitor compliance with Oil &amp; Gas and mining contracts and verify production amounts, exports, and global prices at the SOEs; and · lack of an effective extractive industries governance structure to promote transparency, accountability, and responsibility in the management of extractive industries</p> <p>Therefore, we recommend: · the establishment of an Extractive Industries Revenue Unit within the IRD. The establishment of this unit will enhance the institutional capacity of the IRD to collect adequate revenue from the extractive industries; · to conduct training needs assessment covering the areas of tax audit, risk-based tax audits,</p>	<p><u>Comments from IRD</u></p> <p>Although the reasons contained in the EITI report is partially correct it cannot represent the whole picture of the process. The most important basic principle shall be the Government must have the capabilities to collect the data regarding the extractive industries, auditing of works/accounts, taking action practicing relevant laws. If there are no such capabilities it shall be most difficult for the revenue departments to collect the volume of revenue which should be collected from the relevant extractive industries. The Government has such capabilities only in the Oil and Gas sector. Such capabilities are weak in minerals, gems and forestry resources and the Government's capacity to take action especially in the border areas where many resources are extracted.</p> <p>For the effective management of extractive industries, the Internal Revenue Department needs to have higher capacities as well as law enforcement and abilities to take action are needed in these areas where these industries are located. Another most important point is more information exchange and cooperation and coordination are needed among the relevant government departments. The present status of information exchange and cooperation and coordination has never reached up to the satisfactory stage.</p> <p>It is recognized that the Internal Revenue Department is weak in its internal capacity in</p>	Ongoing	<p>Comments from IRD: March 2019 update: IRD technical capacity levels preclude the establishment of industry specializations at this point in time. However significant technical assistance has been and continues to be provided by donors in connection with the oil &amp; gas industry. In consequence, staff in the Large Taxpayer Offices are better enabled to respond to related revenue risks and taxpayer expectations.</p> <p>2020 update: No change.</p>

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		data exchange, transfer pricing, · the establishment of procedures and systems to administer extractive industries revenue including an assessment and audit strategy; · to set up a data base of all companies and other entities in the extractive industries for taxation purposes; · to set up a Research Team responsible for drafting research and policy documents; and · to conduct a study on the Harmonisation of Mineral Taxation Regimes and the consolidation of fiscal regulations.	tax policy and tax governance. The Internal Revenue Department has been implementing and performing basic reforms in these two areas. Such reforms will help build internal capacity in managing extractive industries. However, it would have to take time to reach up to the stage of effectively managing the extractive industries while capacity building works are rapidly performed.		
31		<p><u>Suggestions relevant to EITI</u></p> <p>To establish a revenue collection unit (Branch) for extractive industries at the Internal Revenue Department (IRD). By establishing such unit, internal capacity of collection of revenue which should be collected from the extractive industries will be enhanced.</p>	<p>Response from the Internal Revenue Department (IRD)</p> <p>In order to establish the modernized and capable tax revenue management system, and the initial phase of reform programme, the Internal Revenue Department (IRD), Ministry of Planning and Finance has established the LTO (Large Taxpayer Office), which is using the Self-Assessment System since 1st April 2014 after receiving the approval on 30th August 2013. In addition to that the MTO (Medium Taxpayer Office) no. (1) has also been set up and using the Self-Assessment System since 1st April 2017. As these offices are taxpayer offices are the largest taxpayer offices in Myanmar and they are collecting tax revenue not only from the extractive industries but also for the commerce and manufacturing sectors. Most of the Companies under the extractive industries sector are places in the Large Taxpayer Office (LTO Office). In this LTO Office there are (3) audit teams formed and capacity building training courses for Oil and Gas sector have significantly been provided.</p>	Ongoing	<p>Comments from IRD:</p> <p>March 2019 update: See updated response to previous recommendation. Circumstances and status remain unchanged. IRD will continue to develop the capability of its staff.</p> <p>2020 update: No change.</p>

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			Such training courses have been supported by the NORAD. According to the present status/situation there is no sufficient manpower in the Internal Revenue Department to manage all extractive industries. According to the reforms programs, arrangements have been made to implement sustainable capacity building works from time to time. It is reviewed that there can be decrease in the long run by scattering the human resources/manpower and aid and support to (many sectors) even in this condition of less capacity.		
32		<u>EITI Sub-Recommendation (1)</u> To study and identify the training needs assessment to cover the areas such as the revenue auditing, risk-based tax auditing, data exchanging, transferred pricing.	<u>Response from the Internal Revenue Department (IRD)</u> Internal Revenue Department has assigned the staffs as per their relative levels to study the tax auditing, transfer pricing, tax reform management training, trainings for the avoidance of double taxation agreement, oil and gas revenue management training, tax policy and expenditures related with tax revenues workshop, policy and activities training, technical support training and more-effective and efficient Integrated Tax Administration System (ITAS) trainings in order to be able to work efficiently and effectively. All of these training had already been conducted by foreign experts from World Bank, OTA, IMF, NORAD, etc. After conducting the above-mentioned trainings, the staffs are able to apply the skills and expertise that they learned from the trainings and it enhanced the capacity of staff for sustainable developmen The training needs assessment works were conducted and the implementation of reform programs have also been approved. As a result of training		Comments from IRD: March 2019 update: Circumstances and status remain unchanged.  2020 update: Capacity building efforts continue with the support of donors as outlined for previous update

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			needs assessment, the risk-based tax auditing work is provided to be mainly done. The NORAD has provided trainings for the Oil and Gas works and the auditing works are also practically being performed. Similarly, the World Bank supports the trainings related to transfer pricing. The purpose of these trainings is to do audit efficiently according to the staff qualification/efficiency or to extend the qualification of the staff.		
33		<u>EITI Sub-Recommendation (2)</u> To establish and perform the procedures and systems including tax supervision and revenue auditing strategy for the collection and management of revenue from the extractive industries	<u>Response from the Internal Revenue Department (IRD)</u> The audit strategy is already finished and the auditing on the general accounts and auditing on the oil and gas sector has been implemented phase by phase in LTO (Large Taxpayer Office) collaborating with NORAD. Furthermore, the auditing is implementing in line with risk management and the audit manual is already set up. All of these steps are already included in Reform Process and currently implementing on it. The IRD would like to say that higher efficiency of performance is badly needed for the management as the extractive industries sector is complicated. At present the Internal Revenue Department has no such kind of efficiency. The auditing strategy has been drawn up and the procedures for general works auditing and oil and gas sector auditing have been provided. It is also important to understand the limitation of efficiency in this part. The individual staff ability must be enhanced and more difficulties can be encountered if starting with more complicated sectors from time to time.	<i>Ongoing</i>	Comments from IRD: March 2019 update: Circumstances and status remain unchanged.  2020 update: No change.
34		<u>EITI Sub-Recommendation (3)</u> To establish and perform data base for all	<u>Response from the Internal Revenue Department (IRD)</u>	<i>Implemented</i>	Comments from IRD: March 2019 update:

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		companies and firms/teams for revenue collection in the extractive industries sector	In accordance with the Tax Reform Programme of Internal Revenue Department, Ministry of Planning and Finance 2014-2024, the Data Centre is started establishing in Nay Pyi Taw and Yangon using the ITAS (Integrated Tax Administration System) for taxation. It will be practiced not only for the extractive industries but also for the other industries as per the project: MMPFM (Myanmar Modernization for Public Financial Management which will be started in December 2019. The present running system of the Internal Revenue Department is based on the manual system. At the LTO office, it has been performed with small scale computer system and all organizations under extractive industries sector are recorded. At present the procurement of an Integrated Tax Administration System (ITAS) is under way. Although it takes several years to use in the whole country, a data base system can be drawn up and used for the policy objectives.		Status: See earlier progress update.  2020 update: The data analysis capability anticipated by the new IT core system for IRD will not be available before the 2024 year.
35		<u>EITI Sub-Recommendation (4)</u> To establish and perform a research team (unit) to undertake to prepare the research and policy papers/reports.	<u>Response from the Internal Revenue Department (IRD)</u> Internal Revenue Department, Ministry of Planning and Finance restructures the organization in line with the tax reform process as per the meeting decision of Union Ministers' cabinet meeting no. (12/2014) dated 19 June 2014. There are 11 units in new organization structure and the research and policy department is included as one of the 11 units. At this moment, a policy division has been established. The IMF team and the NORAD team are also helping this unit to build capacity regarding extractive industries. The re-writing of income tax law	<i>Ongoing</i>	Response from Internal Revenue Department (IRD): March 2019 update: Current levels of technical capability in IRD preclude the establishment of a sustainable research team or unit for this specialized purpose. IRD deploys its existing capability across this and a range of other policy and research focuses to the extent that it can do so.  2020 update: No change.

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			in order to build a basic of law to effectively collect the revenue from the extractive industries and the building of capacity are included in their helps. In re-writing the new income tax law the provisions of international revenue collection such as the transfer pricing (not included in the present income tax law) shall be included. Because of this long-term work, it is able to provide certainty, clarity and accuracy for both the tax payer and the Internal Revenue Department (IRD) from time to time.		
36		<u>EITI Sub-Recommendation (5)</u> To conduct a study and assessment for balanced performance of revenue collection of extractive minerals and integrated performance of financial regulations	Response from the Internal Revenue Department (IRD) The new tax revenue is currently drafting and the extractive industries is included as separated section. Once this new law is enacted, it will be more beneficial and effective for the extractive industries.	<i>Not Implemented</i>	Response from the Internal Revenue Department (IRD):  March 2019 update: The recommendation calls for technical assistance which is not currently available to IRD.  2020 update: The existing Production Sharing Contracts (PSCs) have been jointly reviewed by National Economic Coordination Committee (NECC) and PSC review working group (led by MOPFI) and the observations/suggestions are provided to the relevant agency. With the assistance from World Bank and NORAD, revenue forecasting activities are being done to estimate the revenue from extractive industry sector. In addition, the new income tax law (draft) includes a separate chapter for taxation of extractive industry sector, with an aim to avoid any revenue loss and to collect the right amount of revenue from this sector.
37	Various	<u>Lack of unique Taxpayer Identification Number (TIN) used by all Government Agencies for the identification of the extractive companies</u>  We recommend that all the Government Agencies use a unique TIN to record the payments received from extractive	<u>Comments from IRD</u> Internal Revenue Department has started using the Taxpayer Identification Number (TIN) at (Large Taxpayer Office) LTO using the computer system since financial year 2014-2015 and the use of TIN is being expanded phase by phase at MTO (Medium Taxpayer Office). It is targeted that the new	<i>Implemented</i>	Comments from IRD:  March 2019 update: In collaboration with DICA, unique taxpayer identification numbers are now issued to all corporate taxpayers.  2020 Update: IRD coordinated with Directorate of Investment and



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		companies. This will require continued close cooperation between the different Government Agencies in order to address the situation of existing companies. With regards to the new companies, the TIN should be allocated at the moment they are set up. The TIN should be communicated to all Government Agencies and should be quoted for every company to avoid any ambiguity.	tax management system will be applied to the whole of the Internal Revenue Department on 1 April 2019 during the financial year 2019-2020. On the other hand, not only the extractive industries but also other government agencies related to ITD should use the TIN as same as TIN number used by IRD. In order to use the same TIN and develop the system, the information technology and network system is required to installed as well as the new law is needed to be enacted in compliance with the International Standard.		Company Administration (DICA), Trade Department and Customs Department so that Single Registration can be done among these departments. As a result, Trade Department has been using Taxpayer Identification Numbers (TINs) as a Unique ID instead of Importer/Exporter Registration Number since it operationalizes its Myanmar Trade Net 2.0 Online Licensing system on January 5, 2020. IRD is conducting initial meetings with e-ID system working group of Ministry of Labor, Immigration and Population in order to issue TIN numbers to individual taxpayers. The e-ID system issues a specific number once a person is enrolled as a resident. This specific number will be used as individual TIN number for tax purposes.
38		Consider setting a resource revenue sharing system for extractive revenues Oil, natural gas and mineral revenues are generated in nearly every state and region in Myanmar, with the most important onshore interests lying in Bago, Kachin, Magway, Mandalay, Sagaing, Shan and Tanintharyi. In these areas and others, extractive activities have significantly impacted livelihoods and the local environment. Taxes and fees collected from extractive companies form part of the State Fund Accounts and are programmed to be spent towards projects and expenses for the entire country. There are no specific projects for which revenues collected from mining companies are allocated to.  Given that local communities are the ones directly affected by extractive activities, the government should consider setting up a special fund arising from revenues earned from extractive companies or			Medium Term Fiscal Framework has been practiced since 2015-2016. The demands of State/Regional Financial funds are filled up based on the calculation of MTFF. Tax sharing is carried out using six indicators under Medium Term Fiscal Framework (MTFF).  1. Total population 2. poverty index 3. Area 4. Per capita tax collection 5. Per capital GDP 6. Urban population as percent of Total State population  (-) Political agreement is required for a resource sharing system.

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		<p>revenue sharing mechanisms so that these may be allocated towards projects that would contribute to: · the rehabilitation and development of communities impacted by extractive operations. · mitigate or prevent violent conflicts; · respond to local claims for benefits, based on ideas of local ownership; and · promote regional income equality between resource and non-resource rich regions.</p> <p>For better transparency and efficiency, the revenue sharing system would require stakeholder consensus on any revenue sharing formula, as well as legal codification.</p>			
39		<p><u>Lack of transparency of SOEs</u></p> <p>We recommend that MoNREC and MoEE take reasonable steps to publish an annual aggregate report that covers all SOEs and make it a key disclosure tool directed to the relevant stakeholders including the general public, the parliament and the media. The following information may be included in the annual aggregate report:</p> <ul style="list-style-type: none"> <li>· A general statement on the State's ownership policy and information on how the State has implemented this policy (i.e. Information on the organisation of the ownership function as well as an overview of the progress of SOEs, the relationship between SOEs and the Government, SOEs mandate, role in licensing, conflict of interest management);</li> <li>· Aggregate financial information and reporting on changes in SOEs' boards;</li> </ul>	<p><u>Comments from DOM</u></p> <p>Although the Ministry of Natural Resources and Environmental Conservation has prepared their step in this year to set out the standard requirements of the State-owned Economic Enterprises and private Companies, the State-owned Economic Enterprises under the Ministry of Natural Resources and Environmental Conservation are less transparent than the Oil and Gas sector. The State-owned Economic Enterprises under the Ministry of Natural Resources and Environmental Conservation are less disclosure on information regarding their joint venture businesses, income, expenditures (or) conditions in relationship with the sub-contractors. Besides there are no performances to be more transparent (or) accountable with the works related to the Military/Tatmadaw (Armed Forces). According to the information obtained by the general public, the legislation, nature of</p>		<p>Comments from DOM:</p> <p>MONREC is collaborating in the SOEs reform process in order for SOEs to have clear duty and responsibilities, to have capacities in accordance with the International Standards, to increase revenue from SOEs, to reduce the cost and to promote management capacities. Besides, Extractive Sector SOEs Reform Workshop was held at Horizon Lake View Hotel, Nay Pyi Taw on Feb 21 &amp; 22, 2019. The Senior Officials from the respective departments related with the SOEs transparently presented and discussed the current implementations of economic management, laws, rules and regulations, way forwards and challenges.</p> <p>Comments from ME1:</p> <p>Regarding with the recommendation 7.1.4 Lack of transparency of SOEs, the activities of Ministry, production data, tax revenue, notifications and instructions were published and updated on Ministry website. In new mining rule, the tender system is using for the mining fields explored from government and the mining fields that are being applied from more than one person.</p>

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		<ul style="list-style-type: none"> <li>· Key financial indicators including revenues collected, profit, cash flow from operating activities, gross investment, transfers to the government, spending); and</li> <li>· Information on individual reporting on the SOEs.</li> </ul> <p>We also recommend to complete the transformation of SOEs and separate their current regulatory function into another part of the MoNREC/MoEE, to remove conflicts of interests, leading to better long-term regulation of the extractive sector.</p>	<p>work, mandates and duties and responsibilities are not clear. In some cases, there are dual roles and responsibilities as business partner as well as regulator in running the businesses.</p> <p>In the annual consolidated report, the following points may be included and contained:</p> <p>(a) General declaration on the information about the State-owned policies and how these policies are being implemented (for example information about who own and how possess and summary of the progress of the State-owned Economic Enterprises, relationship between the State-owned Economic Enterprises and the Government, the mandate of the State-owned Economic Enterprises, the role of obtaining licenses, conflict of interest management)</p> <p>(b) Issuance of news regarding the change of Boards of the State-owned Economic Enterprises and consolidated financial information.</p> <p>(c) Income collected, profits, income flow from running businesses, net investment, transfer to the Government, financial spending.</p> <p>(d) Information regarding the individual reporting on the State-owned Economic Enterprises.</p>		<p>Comments from MGE:</p> <p>(A) In 4th MEITI report, the reporting template was filled with allocation of permits, production, payment of jewellery tax, sales at emporium, permit order, in-kind share, social responsibility, income tax payment and environmental conservation. Also, details of UFA (OA)'s earnings and expenses with extended scope was included in the template.</p> <p>(B) Based on the nature of gemstone sector in Myanmar, the Supporting Committee on gems sector will pay attention to Policy Making Theory that incorporates the following points.</p> <p>(A) Agenda setting/ Identification of issues or problems)</p> <p>(B) Policy formulation</p> <p>(C) Policy adoption/ legitimization</p> <p>(D) Policy implementation</p> <p>(E) Policy assessment/ evaluation</p> <p>(C) Plans on Myanmar gemstone policy monitoring and evaluation, and implementation will be included in Chapter (5) and (6) of the Myanmar Gemstone Policy.</p> <p>(D) Comments and suggestions are being requested on 36 policy statements of the MGE, which have been approved as final draft.</p> <p>Comments from MOEE</p> <p>MOGE conducts press release monthly and the factual information and data of Ministry queried by national and international media are disclosed transparently. Furthermore, they are uploaded on Ministry's website and social media in a timely manner.</p>
40	MONREC	<p><u>Management of the Gems and Jade Sector</u></p> <p><u>- Lack of certification, traceability and valuation of the gemstones</u></p> <p>1. Capacity building</p> <p>We recommend to perform a capacity review of MGE staff and to consider</p>			<p>Comments from MGE:</p> <p>Regarding gemstone sale and purchase, state-owned and partner companies are easy to deal with, but private ones are not throughout gemstone production and distribution process. Under this administration, the Supporting Committee (SC) on gems sector was formed with 22</p>

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		<p>developing employees' skills and hiring technically skilled experienced gemstones experts.</p> <p>MONREC and MGE's capacity and technical expertise must be strengthened to begin addressing poor monitoring and oversight, which in turn leads to foregone revenue and growth of the informal sector. The capacity of government agency staff to monitor and enforce legal compliance should also be built.</p> <p>2. Gemstone Governance Framework We recommend the development of a national Gemstone Sector Policy and a corresponding review of the Gemstone legal framework, to improve governance, including production as well as allocation of permits, valuation, export and sales; and the development of appropriate systems and procedures for the monitoring and reporting of gemstone production.</p> <p>3. Valuation Procedures We recommend that MONREC:</p> <ul style="list-style-type: none"> <li>- reviews and strengthens the valuation process of gemstones by involving external valuers with extensive knowledge of the sector markets and valuation methods and by requiring checks against fair value/market price;</li> <li>- opts for a clear description of the valuation method in the minutes of the valuation committee and perform random audits and reconciliations between the valuation of gemstones and their sale prices at the Emporium to determine if there were any shortfalls when collecting the royalties on production.</li> </ul>			<p>members consisting of government officials, businessmen and representatives from civil society organizations (CSOs). The SC has organized workshops in gemstone areas such as Myitkyina, Mogok, Monywa and Mandalay to listen to local people in order to set appropriate tax rate for gemstone, and for the development of gems industry. Pyithu Hluttaw (Lower House) Natural Resources and Environmental Conservation Committee, Amyotha Hluttaw (Upper House) Natural Resources and Environmental Conservation Committee, CSOs and international organizations have been requested for comments and suggestions on 36 gemstone policy statements of the MGE. They are also put online for public counsel.</p>

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		<p>4. Responsible Mining and Traceability</p> <p>We recommend that MONREC considers:</p> <ul style="list-style-type: none"> <li>- Encouraging gemstone mines to begin adopting international standards for responsible mining, to meet the increasing global demand for responsibly sourced gemstones</li> <li>- Exploring the future potential of establishing a mine-to-market traceability system, in line with other similar emerging international initiatives (see footnote for some examples<sup>1</sup>). The Kimberley Process is an international multi-stakeholder certification mechanism that was established in diamond producing countries to stem the flow of rough 'conflict' diamonds. There are several other international initiatives emerging, most of which focus on diamonds and precious metals (not colored gemstones). Nevertheless, Myanmar may wish to begin engaging in talks with local stakeholders and importing countries to consider the viability of establishing a similar sort of certification process to prevent conflict gemstones from entering the legitimate trade. The creation of an international certification could help in combating the informal sector and breaking the link between the illicit trade in rough gemstone and human rights abuses associated with armed conflict. However, any such activity must be preceded by implementation of other recommendations in this report, including clarification of institutional roles and responsibilities, institutional capacity</li> </ul>			

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		building, and development of a sector-wide governance framework.			
41	MGE	<p><u>Gemstones sector institutional reform</u> The main role of MGE is to impose taxes in accordance with the Mines Law and Gemstone Law for Gems and Jade production or for the sale of rough and finished products. MGE also participates in Joint Ventures on behalf of the State, manages the Emporium and issues Gems and Jade permits. There is an inherent conflict of interest between its role as a policymaker, a regulator and also as a JV partner.</p> <p>The existing arrangement does not meet international best practices for governing the State-Owned Enterprises. The cumulation of all these functions coupled with MGE's limited capabilities represent a high risk of conflict of interest.</p> <p>We recommend to revisit MGE roles in any government considerations of institutional reform in Myanmar's gemstone sector and to adapt them to best international practices. The role of MGE and the other departments under MONREC (DoM, DGSE, etc) should be clearly defined in laws and regulations. The segregation between the role of MGE as regulatory body and its role as partner in JVs should be considered.</p>			<p>Comments from MGE:</p> <p>(A) The need of technical skills and experience of MGE staff is a human resource challenge for MGE thus, it has sent its staff to domestic universities to study diploma on gems and masters on geology. It has also organized two English trainings for capacity development of the staff. Furthermore, a training on environmental management was conducted with assistance from Mr. Shane Anthony Langdon of Australian Volunteer International (AVI). In addition, environmental awareness talks are being held in MGE's different regional divisions and staff are being sent to international gems emporia for study purpose.</p> <p>Currently, an English Proficiency Training Course is in session with assistance from Dr. Kathleen Violet Hartig of AVI.</p> <p>(B) Regarding new recruitment for MGE, applicants with degrees around gemstone sector are prioritized and assigned to gems extraction areas.</p> <p>Comment from DGSE: Department of Geological Survey and Mineral Exploration(DGSE) are coordinated with MGE based on the operation needs and perform the geological survey and mineral exploration.</p>
42	MONREC / MOEE	<p><u>EITI Implementation - Completeness of the data reported on license register</u> The EITI Standard requires implementing countries to maintain a publicly available register or cadastral system including comprehensive information regarding each of the licenses relating to companies</p>	<p><u>Comments of DOM</u> The data regarding the license of minerals sector except the application date are described under the heading of the Department of Mining of the Internet Web Page of the Ministry of Mining</p>		<p>Comments from DOM: The data related to the license application date was not included in the previous regulation. According to the rules and regulations published on 13-2-2019, the license application data have been updated on the <a href="http://www.mining.gov.mm">www.mining.gov.mm</a> since 1.8.2018.</p> <p>Comments from ME1 :</p>

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		<p>covered in the EITI Report. This register should cover the following information:</p> <ul style="list-style-type: none"> <li>i. license holder(s);</li> <li>ii. coordinates of the license area;</li> <li>iii. date of application, date of award and duration of the license; and</li> <li>iv. in the case of production licenses, the commodity being produced.</li> </ul> <p>Where such registers do not exist or are incomplete, the EITI Report should include the above information.</p> <p>We noted in certain cases that the list of approved mining and Oil and Gas contracts/permits does not include information about the application date, award date, duration and coordinates of the licensed area.</p> <p>We recommend that MoNREC and MoEE include systematically these information in the register and for it to be accessible by the public via the ministry's website.</p>	www.mining.gov.mm and it has been updated monthly.		<p>For completeness of the data reported on the license register, it was published and updated on the Ministry website.</p> <p>Comments from MGE:</p> <p>(A) Myanmar Gemstone Law was enacted on January 30, 2019 and the development of by-laws are in process. After that, the MGE will act in accordance with them.</p> <p>(B) In order for a mineral cadastre system, the Mineral Cadastre Working Group led by the Department of Mines was formed and trainings are underway. Two MGE officials are in the Working Group.</p> <p>(C) The list of worksites with permit expiry is uploaded to www.mining.gov.mm on monthly basis.</p> <p>Comments from MOEE</p> <p>License system is not practiced in the exploration and production activities of onshore and offshore blocks. International bidding round were called for with a transparent manner by the respective Committee and then they were evaluated with selection criteria. With the permission of Myanmar Investment Commission (MIC), the awarded companies were signed with the Production Sharing Contract (PSC).</p> <p>Tender process, terms and conditions, selection criteria, awarded companies, awarded date, oil and gas blocks' coordinates and their implementation status were uploaded on MEITI website, Ministry's website and social media.</p> <p>Environmental Management Plan (EMP) were reviewed, amended and accepted by MONREC. Therefore, disclosing the information related with EMP is concerned with MONREC.</p>
43	MONREC / MOEE	Unclear licensing process The information we received from MONREC and MoEE regarding the licensing process in the Oil and Gas and mining sectors do not disclose clearly the	<p><u>Comments of DOM</u></p> <p>In the minerals sector, the foreign companies are allowed to invest 100% in obtaining license for minerals exploration, testing/surveying, and large-scale production</p>		<p>Comments from DOM:</p> <p>The 100% foreign investment is allowed in study phase and large-scale production in mining sector. The permits are granted with the "First Come, First Serve" system in accordance with the nature of mining business. In Myanmar</p>

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		<p>technical and financial criteria used to evaluate the license application. Although a bidding process is used in the Oil and Gas sector, the lack of information about the evaluation criteria and the candidates for each license reduces transparency and opens doors to abuses.</p> <p>Despite the fact that foreign investors are prohibited by law to have gems and jade licenses and cannot even enter into JVs with nationals and local companies, in practice it is well known that the beneficial owners of many mines are in fact foreigners which reveals the vulnerability of the licensing process.</p> <p>We recommend that “first come first served” should be the basis for licensing in the mining sector. Competitive procedures should only be applied in the cases where there is detailed geological data available or mineral deposits were proved. in the latter case, the valuation of the bidders should be based on clear technical and financial criteria and identity and beneficial owners of all the candidates should be identified.</p>	<p>and in cooperation with domestic companies. Foreign investment is not allowed in obtaining licenses for other small-scale and manual (bare earner) production.</p> <p>The policy of the Ministry up to date is “First Come First Serve” and “Known Deposit” and the provisions is included and enacted in the new Rules such as if the facts are meeting with as the would-be-operator who wish to do is more than one person, many people are interested, tender calling will be conducted. According to the new rules the application for obtaining licenses for minerals exploration/ testing and surveying/ mining shall only be accepted and performed at the Minister’s office and the Department of Mining.</p> <p>The general public may see and study transparently regarding the License Information after installing the Mineral Cadastre.</p>		<p>Mining Rules and Regulations, it is stated that if the area of land has not been explored, the application of person or organization that apply first will be prioritized in the selection process, and if more than one person or one organization applied for the same area of land, that area has geological data and can produced commercially, the selection is carried out by tender. If with tender process, in order to have transparency in the tender process, it is noticed via government newspapers. The previously permitted licenses and the newly applied licenses are transparently accessible on <a href="http://www.mining.gov.mm">www.mining.gov.mm</a>.</p> <p>Comments from ME1: For unclear license process, the companies made hundred percent investment for exploration and production and used the first come, first serve system and then tender system will be used for mineral ores that are highly interested by public.</p> <p>Comments from ME2: Two representatives from ME2 are participating and cooperating in the Mineral Cadastre Process implemented by DOM.</p> <p>Comments from MGE: (A) Myanmar Gemstone Law was enacted on January 30, 2019 and the development of by-laws are in process. After that, the MGE will act in accordance with them. (B) In order for a mineral cadastre system, the Mineral Cadastre Working Group led by the Department of Mines was formed and trainings are underway. Two MGE officials are in the Working Group. (C) The list of worksites with permit expiry is uploaded to <a href="http://www.mining.gov.mm">www.mining.gov.mm</a> on monthly basis.</p> <p>Comments from MOEE License system is not practiced in the exploration and production activities of onshore and offshore blocks. International bidding round were called for with a transparent manner by the respective Committee and then they were evaluated with selection criteria. With the</p>



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					<p>permission of Myanmar Investment Commission (MIC), the awarded companies were signed with the Production Sharing Contract (PSC).</p> <p>Tender process, terms and conditions, selection criteria, awarded companies, awarded date, oil and gas blocks' coordinates and their implementation status were uploaded on MEITI website, Ministry's website and social media.</p> <p>Environmental Management Plan (EMP) were reviewed, amended and accepted by MONREC. Therefore, disclosing the information related with EMP is concerned with MONREC.</p>
44	IRD	<p>Lack of availability and accessibility of information -IRD</p> <p>One of the identified revenue streams under IRD is withholding taxes arising from interest paid to non-resident foreign nationals, royalty payments to claim owners and purchase of goods and services payments. Final withholding taxes, however, are monitored in aggregate under the current reporting system, irrespective of the extractive companies having withheld the tax. Consequently, IRD disclosures will usually be lower due to the inability to readily extract of withholding taxes details.</p> <p>As a result, IRD may consider customising certain reports generated from the current system that will enable the further disaggregation of information to facilitate reconciliation for future reports.</p>	<p>Comments of IRD</p> <p>As Integrated Tax Administration System (ITAS) is currently implemented, the required data for EITI report will be provided comprehensively once this system has been finalized successfully. It is expected that this system will run for the whole IRD department during April, 2019. Up to now, it is used at LTO and MTO offices. Thus, IRD has already purchased a computer system that can support the detail data for EITI process.</p>	Ongoing	<p>Comments from IRD</p> <p>As Integrated Tax Administration System (ITAS) is currently implemented, the required data for EITI report will be provided comprehensively once this system has been finalized successfully. It is expected that this system will be run during 2020. Up to now, TRMS (Tax Revenue Management System) is used at LTO and MTO offices.</p> <p>March 2019 Update:</p> <p>IRD's more recent understanding of the timeline for deployment of functionality supporting this recommendation suggests that it is possibly still several years away. A more accurate indication may be possible with the next progress update.</p> <p>2020 update:</p> <p>IRD is currently initiating a bidding process for the supply of a new core IT software system; the Integrated Tax Administration System (ITAS). This has become necessary because of the failure to deliver by the previous software provider. EITI reports may be informed with comprehensive and better datasets once ITAS system is</p>

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					operationalized. This is unlikely to occur before the 2024 year.
45	MOGE	<p>Improvement in the bidding process for O&amp;G blocks</p> <p>As part of the EITI process, the government has stated its intention to introduce greater transparency in decision making and better oversight mechanisms. Despite notable improvement in transparency during the most recent onshore and offshore oil and gas bidding rounds, including the public advertising of tenders in English, the selection criteria and decision-making process and Environmental Management Plan (EMP) information remains opaque. Systematic disclosure of the following additional information would improve the governance of the bidding and selection process:</p> <ul style="list-style-type: none"> <li>• who is mandated to make the decision about awards.</li> <li>• the criteria and priorities for selection of successful bidders (these criteria should be revised to seek information on bidders' commitments to environmental and social sustainability by requiring information on policies and management systems for environmental, social, human rights, health and safety, community engagement);</li> <li>• whether there was a signature bonus paid; and</li> <li>• the evaluation criteria and scoring method applied by MOGE, together with a</li> </ul>			<p>Comments from MOEE</p> <p>License system is not practiced in the exploration and production activities of onshore and offshore blocks. International bidding round were called for with a transparent manner by the respective Committee and then they were evaluated with selection criteria. With the permission of Myanmar Investment Commission (MIC), the awarded companies were signed with the Production Sharing Contract (PSC).</p> <p>Tender process, terms and conditions, selection criteria, awarded companies, awarded date, oil and gas blocks' coordinates and their implementation status were uploaded on MEITI website, Ministry's website and social media.</p> <p>Environmental Management Plan (EMP) were reviewed, amended and accepted by MONREC. Therefore, disclosing the information related with EMP is concerned with MONREC.</p>

S/N	Agency	Recommendation from the 1st, 2nd and 3rd and 4th Reports	Prior Year Update/Progress/Comments from Agency	Implemented (Yes, No, Ongoing, Partially) [To update - Below status is from last year report]	Current year Update/Progress/Comments from Agency
		brief justification for the selection of the chosen operators.			
46	MGE, MONREC	<p>Improvement in the bidding process for gemstone permits Gemstone concessions are awarded through competitive bidding. The Myanmar Gems Enterprise (MGE) publishes new opportunities to tender in local newspapers and allows prospective investors one month to survey the concession site. MONREC has not made additional information on the application process available on its website. Mineral licenses are currently awarded on a first-come, first-served basis, although the Gemstone Law opens the door for tenders in future. In both cases, very little published data are available on the selection criteria and decision-making process.</p> <p>We recommend to review and revise bidding processes for mining concessions in consultation with stakeholders for mining states in a bid to promote openness and fairness. This could include the disclosure of:</p> <ul style="list-style-type: none"> <li>• application procedures including all the required steps;</li> <li>• who is mandated to make the decision about awards;</li> <li>• the criteria and priorities for selection of successful bidders (these criteria should be revised to seek information on bidder's commitments to environmental and social sustainability by requiring information on policies and management systems for environmental, social, human</li> </ul>			<p>Comments from MGE: Worksites under current permits were granted under the 1995 Gems Law. New Myanmar Gemstone Law was enacted on January 30, 2019 and the development of Myanmar Gems Rules are in process. Therefore, after by-laws have been enacted, the MGE will follow in accordance with both laws and rules.</p>

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		rights, health and safety, community engagement); • data on active mineral licenses by state and by region; and • guidance to be followed in the event of conflicts of interest and corruption which take account of the identities and histories of bidders.			
47	MONREC / MOEE	<p>Creation of a reporting system for employment data In accordance with the EITI Standard, implementing countries must disclose information about employment in the extractive industries in absolute terms and as a percentage of the total employment. We note that both MONREC and MoEE do not have a reporting system that would determine the direct impact measured through the jobs attributable to the extractive industry. Thus, employment data collected and stated in this report is partial and does not reflect the comprehensive extractive sector contribution.</p> <p>We recommend to review and revise bidding processes for mining concessions in consultation with stakeholders for mining states in a bid to promote openness and fairness. This could include the disclosure of:</p> <ul style="list-style-type: none"> <li>• application procedures including all the required steps;</li> <li>• who is mandated to make the decision about awards;</li> <li>• the criteria and priorities for selection of successful bidders (these criteria</li> </ul>	<p>Comments from DOM Although the provisions regarding the appointment of mining employees, assigning works, age, salary and wages and other fees and allowances are set out in the chapter (17) of the 1996 Myanmar Mines Rules, arrangement shall be made to collect data regarding the network of labour and employment within the own system for the correct data reflecting the present situation and obtaining more data.</p>		<p>Comments from DOM: The employment data of MONREC and JV companies are reported in monthly production reports. The employment data of the companies' mining sector are reported every three months and the officials occasionally conduct the site-check. The employment data of MONREC and JV companies are stated by respective departments on <a href="http://www.mining.gov.mm">www.mining.gov.mm</a>. Comments from ME1: For creation of a reporting system for employment data, it will be easy to collect the information if specific information for employment is classified. Comments from MGE: Details of employees (Male and Female) at company worksites in different gems areas are listed and kept in MGE's different regional divisions. Those lists are sent to MGE (Headquarters) on monthly basis and then forward to the Ministry.</p> <p>Comments from MOEE Employment data has been provided to the relevant ministry.</p>

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		<p>should be revised to seek information on bidder's commitments to environmental and social sustainability by requiring information on policies and management systems for environmental, social, human rights, health and safety, community engagement);</p> <ul style="list-style-type: none"> <li>• data on active mineral licenses by state and by region; and</li> <li>• guidance to be followed in the event of conflicts of interest and corruption which take account of the identities and histories of bidders.</li> </ul>			
48	MONREC	<p>Inaccuracy of production data We understand that the production data provided by SOEs and departments falling under MoNREC was based on the submissions and declarations from the mining companies. MoNREC does not have its own procedures and systems to collect and control production data provided by the mining companies.</p> <p>We recommend that the agencies falling under MONREC set up their own mechanisms, processes and procedures to collect and control production data. Also, it is recommended that the agencies under MoNREC carry out periodic reconciliations of the production volumes declared by the mining companies with the measurements of the agency for each reporting year.</p>	<p>Comments from DOM Since May 2017 the system of monthly reporting of the provision of production target coordinated by both sides before starting the production and the system of field monitoring periodically have been performed.</p>		<p>Comments from DOM: For SOEs, the proposed production is negotiated with respective company before the start of production. The monthly reporting system and occasional field-checks are practiced. It has been checked whether it is able to produce the proposed production. During the monsoon season (June to September) where there is no production, the production is managed by doing site-checked whether the production is certainly stopped by respective regional offices. Having observers in the mining sites and regular field-checks are also performed. Up to date monthly and fiscal-yearly production data of ME1 and ME2, the SOES under MONREC, are accessible on <a href="http://www.mining.gov.mm">www.mining.gov.mm</a>.</p> <p>Comments from ME1: Concerning with For inaccuracy of production data, the estimated production was defined depending on the mineral ore of company and department, and sometimes, field inspection was made to meet the targets based on the monthly reported list of production.</p> <p>Comments from ME2: ME2 signs the contracts by piecework system, production sharing system with the JV companies. Regarding the production data, the data is accurate for the sites under production sharing contract. The State and Region offices under ME2 are undertaking occasional field visit to have</p>

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					<p>the right production for the sites under piecework contract. Starting from October, 2018, the mineral production lists are shown by States and Regions on the ME2 website.</p> <p>Comments from MGE:</p> <p>(A) Production of raw jade extracted by state-owned and partner companies, and private companies in different gems areas are kept in MGE's regional divisions. Such list is sent to MGE Headquarters on daily basis and kept, and then forward to the Ministry monthly.</p> <p>(B) The OAG audits production and revenue from gems on financial year basis.</p> <p>(C) A computer program is being developed to make production data more accurate.</p>
49	Various	<p><u>Lack of availability and accessibility of information on companies social and environmental commitments</u></p> <p>We understand that there are no regulations to date that require mandatory/voluntary expenditure and funds to be specifically disclosed in companies and SOEs annual financial statements.</p> <p>Companies and SOEs could consider publicly disclosing mandatory and voluntary expenditure and funds to ensure full transparency of their social and environmental commitments. Many of these expenditure and funds, if not all, are already disclosed to Government Entities, and would therefore not pose a significant challenge in being made available. Including this information in key public documents such as annual reports, press releases and financial statements, would provide an additional</p>	<p>Comments from DOM</p> <p>There are no regulations provided to demand to include the compulsory voluntary expenditure and finance in the annual financial statements of Companies and State-owned Economic Enterprises.</p> <p>The Companies and State-owned Economic Enterprises may present their compulsory/voluntary expenditure and finance in order to show their full transparency regarding their commitment on corporate social responsibility.</p> <p>These data shall be included and described in the public documents such as annual reports, press releases, financial statements etc.</p>		<p>Comments from DOM:</p> <p>Since 2016, it is specified that, based on the production by the companies, 1% of sales to be contributed in environmental conservation, 2% of sales to be contributed in CSR and 2% of sales to be contributed in Mine Closure Plan. The CSR activities and amounts of the enterprise/ departments and joint ventured departments are accessible on <a href="http://www.mining.gov.mm">www.mining.gov.mm</a>.</p> <p>Comments from MOEE</p> <p>MOGE provides 25% of net profit as income tax, 20% as state contribution and the remaining 55% as Other Account in which 2% of them are allowed to contribute as social expenditures by the Union Government from the budget.</p> <p>Although, there is mandated to perform CSR activities in the PSC contract, how much need to be spent is not described. This is because oil and gas companies implement CSR activities since the study phase in accordance with International Standard. However, in accordance with the sideline of MOGE, oil and gas companies submit and undertake CSR activities as their annual allocated budget.</p> <p>For those CSR activities, guidelines and CSR project report</p>

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		layer of credibility and reliability to the disclosures.			samples have been submitted to Myanmar EITI National Coordination Secretariat dated 24 January 2019 with the official letter No. Admin- OuNyaMa-2/11(0047)2019 by MOGE.
50	MONREC / MOEE	<p><u>Improving the implementation of projects donated by extractive companies</u> We understand that donations and infrastructure projects by extractive companies are given directly to ultimate beneficiaries. These are not always reported by either the beneficiaries or the company to the respective State/Regions, and as such, municipalities and regions are not fully aware of the extent of the companies' contributions to extractive regions.</p> <p>It is recommended that MoEE and MoNREC coordinate with State or regional bodies to keep a record of these projects in order to ensure proper accounting of the value of these contributions and to include them in the development plan of the extractive regions to avoid duplication with the efforts made by the central government.</p>	<p><u>Comments from DOM</u> It is known that the donation and infrastructure projects by the extractive companies are directly provided to the final beneficiaries. The town/city development departments and the region do not aware such kind of provisions (aid and assistance) for the extractive areas due to never acknowledgement to the relevant Regions and States by both beneficiaries and Company. The overlapping can be avoided by inclusion of the value/ cost of such projects by recording and including the appropriate calculation to be made by the Ministry of Natural Resources and Environmental Conservation in cooperation with the Departments of Region and State and include in the development plan to be implemented in these extractive regions by the Central Government. It shall be described in the website by asking separately to the relevant Companies.</p>		<p>Comments from ME2: ME2 and JV companies are collaborating in supporting the regional development for respective mining regions. The activities will be recorded by the State and Region offices under ME2 and the State and Regional Development lists will be shown on the ME2 website. Comments from MGE: (A) MGE is currently implementing projects/ works donated by extractive companies for regional development such as hospital, road, bridge and religious buildings. (B) It has also informed to respective Region/ State Governments and Development Committees about those projects/ works, uploaded them to the Ministry and MGE websites.</p> <p>Comments from MOEE Since the current CSR activities done not only by Ministry but also by joint venture companies are done with the coordination of State and Region governments, these activities are not duplicated and also the ones in need.</p>
51	Government Entities, SOEs	<p><u>Lack of reporting at project level</u> As noted in Section 4.7, the EITI Standard requires reporting at project level in certain circumstances. The MEITI Report does not contain this level of disaggregation because Government Entities, SOEs and companies do not allocate revenue streams between projects.</p>	<p><u>Comments from DOM</u> The Government departments, State-owned Economic Enterprises (SOE) and Companies have been reporting the project stage financial affairs.</p>		<p>Comments from DOM: Although there is no difficulty for ME1, ME2, Myanmar Pearl Enterprise (MPE) and Department of Mines (DOM) for reporting at project level, there will be difficult in Gems and Jade sector as one company holds several permits. Nevertheless, a total of 84 Gems and Jade companies are involved in the 4th MEITI reporting process. Comments from ME1: For lack of reporting at project level, the department can describe income per project but it will be very</p>

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		We recommend Government Entities, SOEs as well as extractive companies assess how to disaggregate revenue streams between projects wherever possible, in order to report these revenue streams at project level.			difficult for companies which describe aggregated data in annual report but not, for each permit and each industry.
52		<p><u>Extracting Data and Information</u>  The purpose of developing an EITI report is to provide reference to the public and shape better understanding of the reconciliation process. To this end, it is vital that the public obtains information and clarification from parties which are directly involved in the extractive governance.  The team of Reconcilers faced numerous difficulties in obtaining data and confirmations due to:</p> <ul style="list-style-type: none"> <li>· red tape which hindered the data gathering process; and</li> <li>· data and information presented by reporting entities inconsistent with the reporting format.</li> </ul> <p>As a result, the EITI report was not of the expected quality. Given the constraints we faced, there was not enough time to perform data analysis properly, which could have been informative to users of the report.</p> <p>Focal points in reporting entities should be encouraged to take more active roles in providing data and information as well as to give comprehensive explanations and confirm elements in EITI report. The reporting format adopted by MSG could be used by reporting entities to start the data collection process, prior the</p>			<p>Comments from DOM:  When Ministry of Planning and Finance and Myanmar EITI National Coordination Secretariat request for the required data from ME1, ME2, MPE, Myanmar Gems Enterprise (MGE) and DOM, it is performed in time as per guidance of the Union Minister. The production volume by sector of SOEs are now being stated in the Ministry's website, and in future, the data included in EITI reports such as the production data, foreign export, employment data, CSR data will be reported not only in template but also via website timely.</p> <p>Comments from ME1:  For extracting data and information, it will be easier to implement if there is standardized formats to refer.</p>



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		Independent Administrator starting the fieldwork.			
53	MSG	<p><u>MSG to consider expanding scope of future MEITI Reports</u></p> <p>The first two MEITI reports relate only to upstream entities (i.e., actual mining and extracting companies) and do not cover sub-contractors, which are part and parcel of the extractive industry. Although coverage of the gemstone sector has expanded in the two last reports, due to massive informal activity they still cover only a fraction of the whole sector.</p> <p>We recommend for future reports, that MSG considers: the inclusion of upstream sub-contractors in the extractive sector. The main objective for the inclusion of these entities is to provide a more comprehensive assessment of the value chain of these industries and their respective economic contribution; · expanding the coverage of the gems and jade sector by applying for Adapted Implementation based on the Gemstone Sector reform plan and including the trading companies in the reconciliation process; and · Military Holding companies and their subsidies as specific entities which are risky and therefore should be subject to higher level of scrutiny, including request to submit an auditors' specific attestation, specific interviews, and / or analysis and auditing of specific transactions within their accounts.</p>			<p>MSG Comments</p> <p>1. In 4th MEITI report, the scoping of Mining and Gems and Jade sector are expanded depending on not only Revenue streams but also permit areas/numbers. It also covers pearl sector in the reconciliation scope.</p> <p>2. For consideration of inclusion of Sub-Contractor, PSC contract should be amended. There is no law for PSC, so that it will need to give directive notification from DoM. Amended PSC contract will be cover on 2019-20 reporting period.</p> <p>3. To reduce informal activities in Jade and Gems sector Government should establish regional sales markets for small scale, GTC, in order to control and traceable of Jade government should regulate medium scale mining</p> <p>4. MSG should encourage to Leading committee to get access the data and qualified information from Military holding companies</p>
54		<u>Sale of the State' share of production</u> According to the EITI requirement (4.2),			<p>Comments from MGE:</p> <p>(A) MGE contributes to the State income tax 25 % from its</p>

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		<p>“where the sale of the state’s share of production or other revenues collected in kind is material, the government, including state-owned enterprises, are required to disclose the volumes sold and revenues received. The published data must be disaggregated by individual buying company. Reporting could also break down disclosures by the type of product, price, market and sale volume.”</p> <p>In case of Myanmar, we understand that according to the Oil and Gas PSCs, the State share on production is calculated on the basis of the total volume produced by the field. The Joint Ventures partners sell all gas revenues in accordance with a long-term gas sales contracts and the revenues received are thereafter allocated on cash basis to MOGE and the partners in accordance to the PSCs provisions. MOGE did not disclose the volume sold and revenues received disaggregated by individual buying company. Information about the price and market destination was not disclosed as well.</p> <p>We recommend to disclose all the information required regarding the first trade of the State’s share of production. This information shall include:</p> <ul style="list-style-type: none"> <li>- the volume and value of each sale operation;</li> <li>- the date;</li> <li>- the type of mineral sold</li> <li>- the identity of the buying company;</li> <li>- the Incoterms;</li> </ul>			<p>net profits and 20 % state contribution annually.</p> <p>(B) Raw jade that the MGE received as in-kind share in FY 2016-17 will be on display for sale in the 56th Myanmar Gems Emporium in 2019.</p> <p>Comments from MOEE</p> <p>MOGE did not take in-kind data from oil and gas companies. According to Domestic Market Obligation in the Clause 14.1 and 14.4 of PSC contract, MOGE buys 20% of crude oil from Share of Profit Petroleum of Contractor and 25% of Natural Gas with the 10% discount of Fair Market Value.</p> <p>Crude Oil and Natural Gas were sold and MOGE also disclose the individual buying company, the type of product sold, the destination country, the sale income.</p>

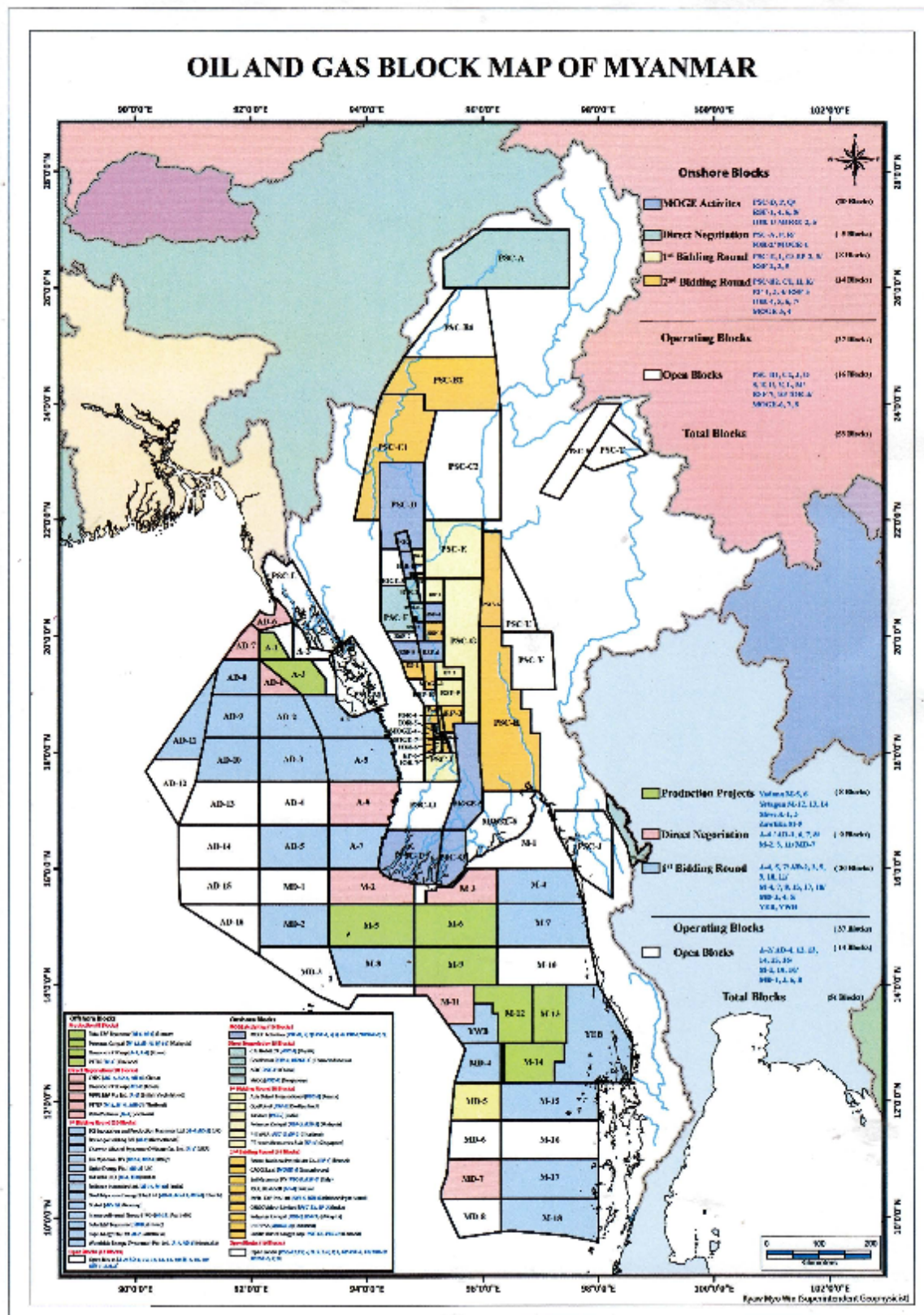
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		<ul style="list-style-type: none"> <li>- the individual price of sell; and</li> <li>- the market/destination of the sale.</li> </ul>			
55	MSG	<p><u>Implementation of recommendations from the first MEITI report</u></p> <p>The recommendations formulated in the first MEITI Report emphasise the need for reforms in existing reporting mechanisms to promote better transparency through enhancement of data quality, and amendments to legislations and existing regulations.</p> <p>We understand that the current design of monitoring action plans to address the recommendations and observations raised in the first MEITI report is still being strengthened.</p> <p>Accordingly, we recommend that MSG implements a formal process to document the review its activities and Government Entities of the recommendations be implemented such as inclusion in the agenda of monthly MSG meetings. Also, review activities can be further re-enforced through adoption of a more structured accountability and reporting lines, as well as fixed timetable for implementation.</p>			<p>MSG's comments</p> <p>Implementation of recommendation of 1st MEITI report, MSG discussed them in the meetings, timely updated to Working Committee and Leading Committee, monitor the activities of relevant government department if they are in their agreed timeframe, all those activities must be recorded in MSG meeting minutes</p>

## ANNEXES

## **Annex 1 Reporting templates**

See the Excel attached

## Annex 2 Map of Oil and Gas blocks



### Annex 3 List of Oil and Gas permits 2017-2018 offshore

Sr. No	Block	Company	Kinds of Activity (Study Period, Exploration, Production)	MIC Permit	Period from	Period To	Company Status (Active/ Pending)	Area	Company Location & Contact Detail	Company Sharing	Remarks
1	M-12	-PCML - 40.91% (Operator-O)	Production	251/1997	1997	30 years from Commercial Operation Date	Active	Tanintharyi	- Malaysia -Japan -Thai -Myanmar	as per coloum 3	Yetagun Project
2	M-13	-Nippon Oil - 19.32% (Partner-P)									
3	M-14	-PTTEPI - 19.32% (P) -MOGE - 20.45% (P)									
4	A-1	-Daewoo International Corporation (Posco Daewoo Corporation)51.00% (O)	Production	445/2010 & 444/2010	2010	30 years from Commercial Operation Date	Active	Rakhine	- Korea - Korea - India - India - Myanmar	as per coloum 3	Shwe Project
5	A-3	-KOGAS - 8.50% (P) -ONGC Videsh - 17.00% (P) -GAIL - 8.50% (P) -MOGE - 15% (P)									
6	AD-7	- Daewoo International Corporation (Posco Daewoo Corporation) - 60% (O) - Woodside EnergyMyanmar Pte. Ltd- 40% (P)	Exploration	416/2007	2007	2019	Active	Rakhine	- Singapore	as per coloum 3	Permit Extension
7	M-3	- PTTEP International Ltd. - 80%(O) - MOECO Asia Pte. Ltd. - 20% (P)	Exploration	394/2004	2004	2019	Active	Mottama	- Thailand - Singapore	as per coloum 3	Permit Extension
8	M-11	-PTTEPI- 80% (O) -MOGE-20% (P)	Exploration	405/2005	2005	2017	Active	Mottama	- Thailand - Singapore - France -Japan	as per coloum 3	Permit Extension
9	M-9	- PTTEP Ltd. - 80% (O) - MOGE - 20% (P)	Production	446/2010 & 447/2010	2010	30 years from Commercial Operation Date	Active	Mottama	- Thailand - Myanmar		Zawtika Project
10	AD-1	- CNPC International Ltd. - 50% (O) - Woodside Energy (Myanmar) Pte. Ltd. 50% (P)	Exploration	413/2007	2007	2019	Active	Rakhine	- Cayman Islands	as per coloum 3	Permit Extension
11	AD-6			414/2007	2007	2019	Active	Rakhine			Permit Extension
12	AD-8			415/2007	2007	2019	Active	Rakhine			Permit Extension
13	A-6	-MPRL E&P Ptd. Ltd. - 20% (O) -Woodside Energy (Myanmar) Pte.Ltd. - 40%(P) -Total E&P Myanmar - 40%(P)	Exploration	411/2006	2006	2017	Active	Rakhine	-British VirginIslands -Singapore -France	as per coloum 3	Permit Extension

Sr. No	Block	Company	Kinds of Activity (Study Period, Exploration, Production)	MIC Permit	Period from	Period To	Company Status (Active/ Pending)	Area	Company Location & Contact Detail	Company Sharing	Remarks
14	M-2	-Petrovietnam Exploration Production Corporation - 45% (O) -Eden Group Co., Ltd - 15% (P) - Maurel&Prom Exploration & Production7-40%(P)	Exploration	429/2008	2008	2018	Active	Mottama	-Vietnam - Myanmar - France	as per coloum 3	Permit Extension
15	MD-7	- PTTEP South Asia Ltd. -50% (O) - Total E&P Myanmar - 50%	Exploration	559/2013	2013	2020	Active	Tanintharyi	-Cayman Islands -France	as per coloum 3	
16	AD-3	- Unocal Myanmar Offshore Co., Ltd. 55% (O) '- Ophir Myanmar (Block AD-3)Ltd. - 42% (P) - Parami Energy Development Co.,Ltd. - 2.5% (P) '- Royal Marine Engineering Co., Ltd. - 0.5% (P)	Exploration	869/2014	2015	2023	Active	Rakhine	- Channel Islands -Myanmar	as per coloum 3	
17	M-8	- Barlanga Myanmar Pte. Ltd. - 95% (O) -A-1 Mining Co., Ltd. - 5% (P)	Study	867/2014	2015	2022	Active	Mottama	-Signapore -Myanmar	as per coloum 3	
18	MD-5	-Shell Myanmar Energy Pte. Ltd.-90% (O) -MOECO Asia South Pte. Ltd.-10% (P)	Study	881/2014	2015	2023	Active	Tanintharyi	-Singapore -Singapore	as per coloum 3	
19	AD-9	-Shell Myanmar Energy Pte.Ltd.-54% (O) -MOECO Oil and Gas Asia Pte.Ltd.10% (P)	Study	879/2014	2014	2023	Active	Rakhine	-Singapore -Singapore	as per coloum 3	
20	AD-11	-PC Myanmar (Hong Kong) Ltd.-36% (P)		880/2014	2014	2023	Active	Rakhine	-Hong Kong	as per coloum 3	
21	A-5	-Unocal Myanmar Offshore Co.,Ltd-55% (O) - Ophir Myanmar (Block AD-3) Ltd. 42% (P) - Parami Energy Development Co., Ltd 2.5% (P) -Royal Marine Engineering Co.,Ltd-0.5% (P)	Study	907/2015	2015	2023	Active	Rakhine	-Islands of Bermuda -Myanmar	as per coloum 3	
22	A-4	- BG Exploration&Production Myanmar Pte. Ltd. - 45% (O) - Woodside Energy (Myanmar )Pte.Ltd.-45%(P) - Myanmar Petroleum Exploration & Production Co., Ltd. - 10%	Study	916/2015	2015	2022	Active	Rakhine	-Singapore -Singapore -Myanmar	as per coloum 3	
23	AD-2	- BG Exploration&Production Myanmar Pte. Ltd. - 55% (O) -Woodside Energy (Myanmar ) Pte.Ltd. - 45% (P)	Study	917/2015	2015	2023	Active	Rakhine	-Singapore -Singapore	as per coloum 3	



Sr. No	Block	Company	Kinds of Activity (Study Period, Exploration, Production)	MIC Permit	Period from	Period To	Company Status (Active/ Pending)	Area	Company Location & Contact Detail	Company Sharing	Remarks
24	A-7	-Woodside Energy (Myanmar ) Pte. Ltd.- 45% (O) '-BG Exploration&Production Myanmar Pte. Ltd. - 45% (P) - Myanmar Petroleum Exploration & Production Co., Ltd. - 10% (P)	Exploration	918/2015	2015	2022	Active	Rakhine	-Singapore -Singapore -Myanmar	as per coloum 3	
25	AD-5	- Woodside Energy (Myanmar ) Pte.Ltd - 55% (O) '- BG Exploration&Production Myanmar Pte. Ltd. -45% (P)	Study	919/2015	2015	2023	Active	Rakhine	-Singapore -Singapore	as per coloum 3	
26	M-5	- Total E&P Myanmar - 31.24% (O) - Unocal Myanmar Offshore Co., Ltd - 28.26%(P) - PTTEP - 25.50%(P) - MOGE - 15%(P)	Production	055/1992 & 124/1995	1995	30 years from Commercial Operation Date	Active	Mottama	- France -Bermuda -Thailand -Myanmar	as per coloum 3	Yadana Project
27	M-6									as per coloum 3	
28	YWB	Total E&P Myanmar 100%(O)	Study	868/2014	2015	2023	Active	Tanintharyi	-France	100%	
29	M-15	- CFG Energy Pte.Ltd. - 80% (O) '- TRG M15 Pte.Ltd. - 10% (P) - Century Bright Gold Co., Ltd.-10%(P)	Study	929/2015	2015	2022	Active	Tanintharyi	-Singapore -Singapore -Myanmar	as per coloum 3	
30	MD-2	- Eni Myanmar B.V - 60% (O) - Total E&P Myanmar - 40% (P)	Study	932/2015	2015	2023	Active	Mottama	- Netherlands -Vietnam -France	as per coloum 3	
31	MD-4		Study	933/2015	2015	2023	Active	Tanintharyi		as per coloum 3	
32	M-17	- Reliance Industries Ltd. - 96% (O) - United National Resources Development Services Co., Ltd. - 4% (P)	Study	930/2015	2015	2022	Active	Tanintharyi	-India -Myanmar	as per coloum 3	
33	M-18		Study	931/2015	2015	2022	Active	Tanintharyi		as per coloum 3	
34	M-7	-Tap Energy(M-7) Pte Ltd. - 95% (O) -Smart E&P InternationalCo.,Ltd - 5% (P)	Study	928/2015	2015	2022	Active	Mottama	-Singapore -Myanmar	as per coloum 3	

## Annex 4 List of Oil and Gas permits 2017-2018 onshore

Sr. No	Block	Company	Kinds of Activity (Study Period, Exploration, Production)	MIC Permit	Period from	Period To	Company Status (Active/ Pending)	Area	Company Location & Contact Detail	Company Sharing	Remarks
1	MOGE-1	-Goldpetrol JOC Inc. 100% (Operator-O)	Production	216/1996	1996	2028	Active	Yenangyaung	-Indonesia	100%	Permit Extension
2	IOR-2			215/1996	1996	2028		Chauk		100%	Permit Extension
3	MOGE-2	-MPRL E&P Pte. Ltd.100% (O)	Production	218/1996	1996	2024	Active	Mann	-British Virgin Island	100%	Permit Extension
4	PSC- F	-North Petro-Chem CorporationMyanmarLtd. (NPCCM) - 40%(O) -Asia Petroleum Investment Company (APIC) -60% (Partner-P)	Semi-exploration	442/2010	2010	2017	Active	Ngahlaing Dwin	-P.R. China -England and wales	as per coloum 3	Permit Extension
5	PSC-R	-SNOG Pte Ltd. - 94% (O) -UPR Pte Ltd. - 6% (P)	Exploration	450/2011	2011	2021	Active	Mepale	-Singapore -Myanmar	as per coloum 3	Permit Extension
6	RSF-9	-Geopetrol International Holding Inc. - 80% (O) -A-1 Mining Company .Ltd.-20% (P)	Exploration	471/2012	2012	2018	Active	Pylo-Paukkaung	-Panama -Myanmar	as per coloum 3	
7	PSC-I	- Myanmar PSC I Pte. Ltd. 68.4% (O) -Jubilant Oil & Gas Pte.Ltd.-9.1% (P) -Parami Energy Development Co.,Ltd-22.5% (P)	Exploration	474/2012	2012	2018	Active	Hinthada	-India -Myanmar	as per coloum 3	
8	PSC-G	-PTTEP South Asia Ltd.-70%(O) -Win Precious Resources Pte Ltd.-10% (P) - Palang Sophon Offshore Pte.Ltd.(PSO)-10%(P) - MOECO -10%(P)	Exploration	482/2012	2012	2018	Active	TaungDwin Gyi	-Cayman Islands -Myanmar -Singapore -Singapore	as per coloum 3	
9	EP-2			480/2012	2012	2018	Active	AungLan		as per coloum 3	
10	EP-5	-IsTech Energy EP5 Pte. Ltd. - 95%(O) -Smart Technical Services Ltd.-5% (P)	Exploration	481/2012	2012	2018	Active	Inbin-Tegyigon	-Singapore -Myanmar	as per coloum 3	
11	PSC-E	-Asia Orient International Ltd.-85% (CJs Oc "Nobel Oil") (O) -A' Lister Services Co., Ltd.-15% (P)	Exploration	479/2012	2012	2018	Active	Myingyan	-Hong Kong -Myanmar	as per coloum 3	
12	PSC-K		Exploration	762/2014	2014	2021	Active	Yamethin		as per coloum 3	

Sr. No	Block	Company	Kinds of Activity (Study Period, Exploration, Production)	MIC Permit	Period from	Period To	Company Status (Active/ Pending)	Area	Company Location & Contact Detail	Company Sharing	Remarks
13	RSF-5	-Eni Myanmar B.V.-90% (O) -Myanmar Petroleum Exploration and Production Co., Ltd.-10% (P)		763/2014	2014	2021	Active	Ondwe	- Netherlands -Myanmar	as per coloum 3	
14	MOGE-3	-PTTEP South Asia Ltd.-77.5% (O) -Palang Sophon Offshore Pte. Ltd - 10% (P) -Win Precious Resources Pte. Ltd.- 2.5% (P) -MOECOAsiaMG3Pte.Ltd. 10%(P)	Exploration	764/2014	2014	2021	Active	Padaukpin-Natmi	-Cayman Islands -Singapore -Singapore	as per coloum 3	
15	B-2	-ONGC Videsh Ltd. -97%(O) -Machinery and Solutions Co., Ltd.- 3% (P)	Exploration	784/2014	2014	2021	Active	Zepyutaung-Nandaw	-India -Myanmar	as per coloum 3	
16	EP-3			785/2014	2014	2021	Active	Thegon-Shwegu		as per coloum 3	
17	EP-4	-Bashneft International B.V.75% (O) -Sun Apex Holdings Ltd.25% (P)	Exploration	790/2014	2014	2021	Active	Mayaman	-Netharland -British Virgin Island	as per coloum 3	
18	PSC C-1	-Pacific Hunt Energy Corporation - 75%(O) -Young Investment Group Co. Ltd.- 25% (P)	Exploration	787/2014	2014	2021	Active	Yenan-Indaw	-Canada -Myanmar	as per coloum 3	
19	PCS-H			788/2014	2014	2021	Active	Taungoo-PyinMaNa		as per coloum 3	
20	IOR-5	-Petronas Carigali Myanmar Inc.- 67.25%(O) -UNOG Pte Ltd. - 12.75% (P) - Brunei National Petroleum Co., Sdn.Bhd. (PB Myanmar Pte. Ltd.)- 20% (P)	Exploration	797/2014	2014	2021	Active	Htantabin	-Liberia -Singapore -Myanmar	as per coloum 3	
21	IOR-7			793/2014	2014	2021	Active	Shwepyitha	-Liberia -Singapore -Myanmar	as per coloum 3	
22	EP-1	-Brunei National Petroleum Co., Sdn.Bhd. (PB Myanmar Co., Ltd.)-43.625% (O) -IGE Pte. Ltd. - 12.75% (P) -Petronas Carigali Myanmar Inc.- 43.625% (P)	Exploration	786/2014	2014	2021	Active	Kyaukkyi-Mindon	-Myanmar -Myanmar -Malaysia	as per coloum 3	

Sr. No	Block	Company	Kinds of Activity (Study Period, Exploration, Production)	MIC Permit	Period from	Period To	Company Status (Active/ Pending)	Area	Company Location & Contact Detail	Company Sharing	Remarks
23	MOGE-4	-CAOG S.a' r. l(CAOG Pte. Ltd.)- 94.5% (O) -Apex Geo Services Co., Ltd. 5.5% (P)	Exploration	789/2014	2014	2021	Active	Myintha	-Singapore -Myanmar	as per coloum 3	

## **Annex 5 List of Gems and Jade Licenses**

See the Excel attached

## **Annex 6 List of Mining Licenses**

See the Excel attached

## Annex 7 Companies' profile

### Oil and Gas

N o.	Company	Registry Number	Founding date	Core business activities	Secondary business activities	Certified FS	Auditor Name
1	Gold Petrol Joint Operating Company Inc., (GJOC Inc.)	177 FC 97-98	01/04/1998	Exploration and Production of Crude Oil	N/C	Yes	NC
2	MPRL E&P Pte Ltd. ( Yangon Branch )	177811262	07/08/2000	Exploration & Production	N/C	Yes	Khin Su Htay & Associates Ltd.
3	PC Myanmar (Hong Kong) Limited	166259592	08/12/1991	Petroleum Exploration/ Production	N/C	Yes	U Hla Tun & Associates Limited
4	Posco Daewoo Corporation (Myanmar E&P Office)	114730092	17/06/2002	Exploration, Development, Production and Sale of Natural Gas	N/C	Yes	U Hla Tun & Associates Ltd
5	PTTEP International Ltd.	84/FC	19/10/1995	N/C	N/C	Yes	U Hla Tun & Associates Limited
6	Total E&P Myanmar	186813227	03/11/1992	Exploration & Production of Crude Oil& Gas	N/C	Yes	U Hla Tun & Associate
7	Gail JJ India Ltd						
8	Korea Gas Corporation						
9	Nippon Oil Exploration (Myanmar) Ltd						
10	ONGC Videsh Ltd.,						
11	Unocal Myanmar Offshore Co., Ltd.	9FC of 1994-1995	21/04/1994	N/C	N/C	Yes	U Hla Tun & Associates Limited
12	Asia Orient International Ltd. (CJs Oc Nobel Oil)						
13	Bashneft International B.V. (Myanmar Branch)						
14	Berlanga Myanmar Pte Ltd., (Myanmar Branch)	155075031	19/03/2015	N/C	N/C	Yes	Deloitte
15	BG Exploration & Production Myanmar Pte. Ltd. (Myanmar Branch)	107276645		Petroleum exploration activities	N/C		EY UTW (Myanmar) Limited
16	Brunei National Petroleum Company Sdn Bhd (PB Myanmar)						
17	CAOG PTE LTD (MYANMAR BRANCH)	108009233	19/03/2015	N/C	N/C	Yes	Deloitte
18	CFG Energy Pte Ltd.,	116092360	01/11/2014	N/C	N/C	N/C	N/C
19	ENI Myanmar B.V. (Myanmar Branch)	134183292	13/05/2013	Extraction of crude petroleum and natural gas	N/C	Yes	UTW (Myanmar) Limited

N o.	Company	Registry Number	Founding date	Core business activities	Secondary business activities	Certified FS	Auditor Name
20	IsTech Energy EP-5 Pte Ltd., (Myanmar Branch)	105603525	30/05/2012	Oil & Gas Exploration-PSC Contract with MOGE	N/C	Yes	Daw Winn Htay & Associates
21	Jubilant Oil & Gas Pte. Ltd.						
22	North Petro-Chem Corporation Myanmar Ltd. (NPCMM)						
23	Ophir Myanmar (Block AD-3) Limited (Myanmar Branch)	103204453	26/01/2015	Oil & Gas Exploration and Production	N/C	Yes	Myanmar Vigour
24	Pacific Hunt Energy Corporation (Myanmar Branch)	187436311	05/08/2017	Extraction of crude petroleum and natural gas	N/C	Yes	MYANMAR VIGOUR & ASSOCIATES LIMITED
25	Parami Energy Development Company Ltd						
26	Apex Geo Services Co.,						
27	Petronas Carigali Myanmar Inc (PCMI)	167068618	19/09/2011	Petroleum Exploration/ Production	N/C	Yes	U Hla Tun & Associates Limited
28	Petrovietnam Exploration Production Corporation						
29	Reliance Industries Ltd.						
30	Shell Myanmar Energy Pte. Ltd. - Yangon Branch	107278451	24/09/2014	Petroleum exploration activities	N/C	Yes	EY UTW (Myanmar) Limited
31	SNOG Pte Ltd						
32	Tap Energy (M-7) Co., Ltd. (Statoil)						
33	TRG M15 Pte. Ltd.						
34	Woodside Energy (Myanmar) Pte Ltd	104674488	29/11/2013	Exploration and Production of Crude Oil and Natural Gas	N/C	Yes	UTW (Myanmar) Limited
35	MOECO Asia Pte. Ltd						
36	SmartE&PIInternational Co.,Ltd						
37	United National Resources Development Services Co., Ltd						
38	Century Bright Gold Co., Ltd						
39	Myanmar Petroleum Exploration & Production Co., Ltd.						
40	Royal Marine Engineering Co.,Ltd						
41	Eden Group Co., Ltd						
42	Maurel & Prom Exploration & Production						
43	CNPC International Ltd.						

N o.	Company	Registry Number	Foundin g date	Core business activities	Second ary busines s activiti es	Certifi ed FS	Auditor Name
44	Asia Petroleum Investment Company (APIC)						
45	UPR Pte Ltd.						
46	A-1 Mining Company .Ltd.						
47	Win Precious Resources Pte Ltd.						
48	Palang Sophon Offshore Pte. Ltd. (PSO)						
49	Smart Technical Services Ltd.						
50	A-Lister Services Co., Ltd.						
51	Machinery and Solutions Co., Ltd.						
52	Sun Apex Holdings Ltd.						
53	Young Investment Group Co. Ltd.	108744308	04/05/2015	N/C	N/C	Yes	Daw Thant Myat Win (Focus Consulting Group Ltd)
54	IGE Pte. Ltd.						
55	UNOG Pte. Ltd.						



## Oil and Gas transportation

No.	Company	Registry Number	Founding date	Core business activities	Secondary business activities	Certified FS	Auditor Name
1	South East Asia Gas Pipeline Co.,Ltd(Great Ocean Branch)(SEAGP)	17 FC (2010-2011) / 180954341	10/03/2011	Natural Gas Transportation by Pipeline	N/C	Yes	UTW ( Myanmar) Limited
2	Southeast Asia Crude Oil Pipeline (SEAOP)	15 FC (2010-2011) / 180808949	31/01/2011	Natural Gas Transportation by Pipeline	N/C	Yes	UTW ( Myanmar) Limited
3	Anadaman Transportation Limited(Yangon Branch)(ATL)	13 FC	08/09/2011	N/C	N/C	Yes	U Hla Tun & Associates Limited
4	Moattama Gas Transportation Co.,Ltd(MGTC)	142356155	15/12/1995	Natural Gas Transportation	N/C	Yes	U Hla Tun & Associate
5	Tanitharyi Pipeline Company LLC(Myanmar Branch)(TPC)	183495127	17/07/1997	Construction and operation of natural gas pipeline, processing compression and transportation of natural gas	N/C	Yes	U Hla Tun & Associated Limited

## Pearl sector

No .	Company	Registry Number	Founding date	Core business activities	Secondary business activities	Certified FS	Auditor Name
1	Myanmar Tasaki Co., Ltd	151618537	21/06/2001	Artificial Breeding and Culturing of Pearls	N/C	Yes	JF Group Accounting & Auditing Firm
2	Myanmar Atlantic Co., Ltd	109939404	14/08/1998	Breeding of Oysters, Rearing of Oysters and Culturing of Pearls	N/C	Yes	U Hla Tun & Associates Limited
3	Myanmar Andman Co., Ltd	104651240	23-12-1998	N/C	N/C	Yes	Daw Khaing Su Aung
4	Belppearl Myanmar Co., Ltd	105482817	19/08/2014	Artificial Breeding of Oysters, Rearing of Oysters and Culturing of Pearls	N/C	No	Kyu Kyu Win & Associates Services Co., Ltd
5	Nino Pearl Culturing Co., Ltd	157123394	24/2/2000	N/C	N/C	Yes	Tin Tin Htike
6	Orient Pearl Co., Ltd (Zinyaw)	1384/1998-1999	24/02/1999	Production of Myanmar South Sea Pearl (Zinyaw Kyunn)	N/C	Yes	Win Group Audit Firm
7	Orient Pearl Co., Ltd (Jalan)	1384/1998-1999	24/02/1999	Production of Myanmar South Sea Pearl (Jarlan Kyunn)	N/C	Yes	Win Group Audit Firm
8	Annawar Pearl Co., Ltd (Marine Pearl Company)	109604496	22.04.2010	N/C	N/C	Yes	U Sein Win
9	Pyae Sone Htet Myint Co., Ltd	100108143	10/10/2014	Pearl Culturing	NUL	Yes	U Myat Lwin Moe
10	Aquagold Myanmar Co., Ltd	110185464	04/09/2015	PEARL PRODUCTION	Nail	Yes	HNA Group
11	Pyae Phyo Tun Co., Ltd	164028682	07/01/1994	Frozen Export	N/C	No	N/C

## Gems and Jade sector

N°	Company	Registry Number	Founding date	Core business activities	Secondary business activities	Certified FS	Auditor Name
1	Linn Lett Win Yadanar Gems Co Ltd	150969522	01/04/2000	Gems	Nc	No	N/A
2	Yar Za Htar Ni	102310144	11/01/2011	Jade Business	Nc	Yes	U Zaw Lwin
3	YADANAR TAUNG TEN	No.787/2000-2001	28/08/2000	Nc	Nc	Yes	U Sun Tun
4	Wai Aung Gabar	153250650	180/07/2005	Jade Extracting	Nc	Yes	YEE YEE KHIN /Focus Consulting Group Ltd.
5	Ayeyar Yadanar Gems & Jewellery Co.,Ltd	102323033	12/02/1996	Jade Business	Nc	Yes	U Zaw Lwin
6	A K N K						
7	SILVER ELEPHANT GEMS CO LTD	196422048	28/05/2001	Nc	Nc	Yes	Focus Consulting Group Limited
8	Phyo Thiha Kyaw	109675040	15/11/2006	Jade	Nc	Yes	U Sun Tun (B.A,CPA, F.B.S.A)
9	Same Wai Hlaing (SWH)	106379017	30/03/2011	Jade	Nc	Yes	DAW YEE YEE KHIN
10	Mya Garden (GEG)	115165925	08/06/2011	Jade Mining	Nc	Yes	Kyu Kyu Win & Associates Services Co.,Ltd.
11	Kan Pwint Oo	108440619	03/12/2003	Nc	Nc	Yes	Zin & Friends Audit Firm
12	Shwe Ngar Koe Kaung	103883865	03/11/1996	Nc	Nc	Yes	Daw Khin Thin Kyu Audit Firm
13	Shwe Gaung Gaung Gems Co Ltd	173478178	06/02/1996	Jade	Nc	Yes	NGWE INZALY AUDIT FIRM
14	Htun Tauk Zabu Gems & Jewellery Co;Ltd.	101178919	25/11/2011	Nc	Nc	Yes	Zaw Lwins & Associations Audit Firm
15	Sein Lonm Taung Tan (SLTT-S)	183561383	25/10/1996	Nc	Nc	Yes	Daw Hla Than
16	Ayar Jade	108175893	05/05/2009	Jade	Nc	Yes	U Sein Kyaw Win
17	Shining Star Light Gems & Jewellery Co.,Ltd	193310389	19/05/2004	Raw Jade Excavation	No	Yes	Daw Khin Thin Kyu Audit Firm
18	Yadanar Sin Thiri Gems Co	145864046	24/09/2002	Nc	Nc	Yes	Ngwe Inzaly Audit Firm
19	SHWE OAK KHAI MINING CO.,LTD.	101538060	02/06/2011	Jade Business	Nc	Yes	U Zaw Lwin
20	Jade Mountain	176743174	12/05/2000	Jade	Nc	Yes	U Sun Tun (B.A,CPA, F.B.S.A)
21	Thirawmani	106962162	14/11/1995	Gems & Gade	Nc	Yes	KHAING WIN B.COM.C.P.A,D.B.L,D.M.L.DIL
22	Phoe Thar Htoo Gems Co.,Ltd.	147968183	15/08/2003	Gems	Nc	No	N/A
23	Myanma Seinn Lei Aung Gems Co Ltd.	104372880	06/03/2000	Gems	Nc	Nc	Nc
24	Yadanar Yaung Chi	152951604	04/08/2008	Nc	Nc	Nc	Nc
25	Linn Htet Aung Gems Co.,Ltd.	1952818234	13/08/2003	Gems	Nc	Nc	Nc

N°	Company	Registry Number	Founding date	Core business activities	Secondary business activities	Certified FS	Auditor Name
26	Norbal Three Star (GMMK)	104323286	07/06/2011	Jade	Business of Culturing, Production and Selling of Pearls	Yes	Daw Sandar Aye
27	WAN BROTHERS	100226448	27/12/1995	Jade	Nc	Yes	ZIN & FRIENDS
28	Mya Young Tun	2393/2012-2013	13/09/2012	Nc	Nc	Yes	FOCUS CONSULTING GROUP LTD
29	Nan Htike Pyae Paing Co	101493539	27/09/2010	Jade	Nc	Yes	U Zaw Lwin
30	Khun Paooe	162307657	29/01/1996	Nc	Nc	Nc	Nc
31	Great wall Gems&Jade company	111033986	28/11/2006	Nc	Nc	Yes	Daw Khin Thin Kyu Audit Firm
32	Great Genesis Gems (GMH)	1275806086	16/08/2005	Jade	Business of Culturing, Production and Selling of Pearls	Yes	Daw Thant Myat Win
33	Htat Aye Yar	107652248	12/01/2011	Jade	Nc	Yes	U Zin Wai
34	Wai Family	174 / 2000 - 2001 (102870808)	04/05/2000	Jade Extracting	Nc	Yes	DAW YEE YEE KHIN Focus Consulting Group Ltd.
35	Seng Tawng Gems&Jewellery Co., Ltd	112486801	20/12/1995	Jade	Nc	Yes	Than Than Win & Associates
36	Kyauk Same Nan Taw (GKN)	100798247	10/02/2004	Jade	Nc	Yes	U Khin Maung Myint
37	Jade Land	102449940	15/11/995	Jade Mining	No	Yes	Ngwe Inzali Audit Firm
38	Jade Than Lwin	115655183	04/02/2012	Jade Production	No	Yes	Nc
39	1 1 1	121174545	16/05/2006	Nc	Nc	Yes	Zin & Friends Audit Firm
40	Kaung Myat Thu Ka	1005814935	19/05/2014	Gems	Nc	No	N/A
41	Seine Pwint Pwint Wai	116600978	11/05/2010	Jade	Nc	Yes	U Sai Soe Win
42	Khine Myanmar	161540552	05/04/2012	Nc	Nc	Yes	Ngwe Inzaly Audit Firm
43	Unity	1259/1995-1996	24/01/1996	Nc	Nc	Yes	FOCUS CONSULTING GROUP LTD
44	Wai Yan Thar (WYT)	2389/2012-2013	13/09/2012	Nc	Nc	Yes	FOCUS CONSULTING GROUP LTD
45	Sin Gaung Taung	105919638	13/6/1996	Gems	Nc	Yes	U Zaw Lwin
46	GREEN MOUNTAIN CO;LTD	137474379	13/12/2006	Nc	Nc	Yes	FOCUS CONSULTING GROUP LTD.
47	Chang Long Gems & Jewellery Co Ltd	147874405	15/11/1995	Jade	Nc	Yes	Ngwe Izaly
48	Kyaut Myat Min	113325240	22/11/2007	Jade Production	No	Yes	FOCUS CONSULTING GROUP LTD
49	Yadanar Shwe Ye Win	100012707	16/12/2005	Gems	Nc	Yes	Ngwe Inzaly Audit Firm
50	Myit Sone Ayar	145315298	11/08/2005	Gems	Nc	No	No

N°	Company	Registry Number	Founding date	Core business activities	Secondary business activities	Certified FS	Auditor Name
51	Yadanar Aung Chan	145839467	24/09/2002	Nc	Nc	Yes	Ngwe Izaly
52	Myanmar Imperial Jade Co	176227869	13/09/1996	Business of Production & Sale of Jade	Nc	Yes	Kyu Kyu Win & Associates Services Co.,LTD
53	Khin Zaw Aung & Brother	109567442	30/11/2007	Nc	Nc	Nc	Nc
54	Myanmar First Gems & Jewellery Co Ltd	112643648	09/04/2006	Nc	Nc	Yes	Daw Khin Thin Kyu Audit Firm
55	Ever Winner [EW]	102788486	27/12/1995	Gems	Nc	No	N/A
56	Shwe Hein Htet Gems Co Ltd	113888792	18/06/2002	Jade	Nc	Yes	Myanmar Golden Accounting & Auditing Firm
57	Myo Nwe Gems	162073524	12/07/1999	Gems	Nc	Yes	Self-Assessment System
58	Tun Naing Aung	153051356	10/06/2002	Production of Jade	Nc	Yes	THAUNG AYE & ASSOCIATES
59	Nay Min Kabar Co	112235213	14/03/2011	Gems & Jade	Nc	Yes	Daw Win San FOCUS Consulting Group Ltd
60	Zebu Thiri Gems Co.,Ltd	111921644	12/10/2009	Jade Production	No	Yes	FOCUS CONSULTING GROUP LTD
61	Yadanar Three Elephants Co	106857660	21/09/2015	Gems	No	No	FOCUS CONSULTING GROUP LTD.
62	Kyaing International (GKI)	106577293	15/11/2007	Gems & Jade	Nc	Yes	Focus Consulting Group Co.,Ltd
63	Nan Oo Yadanar	100192071	27/12/1995	GEMS	Nc	Yes	Sein Win & Associates
64	Su Htu Pan	103300215	29/08/1996	Gems	Nc	Yes	Ngwe Inzaly
65	Long Byit	104973124	14/11/1995	Gems and Jewellery	No	Yes	U Min Lwin Oo, U Min Lwin Oo& Associates
66	Super Sein	112301100	28.3.1996	Gems	Nc	Yes	Daw Sandar Aye
67	Win Lei Yadanar	110049617	20/04/2004	Gems	Nc	Yes	ZIN WAI B.COM;(AA);C.P.A(210)
68	Kyal Sin Phyu	103508312	17/01/2013	Raw Jade Excavation	No	Yes	Daw Khin Thin Kyu Audit Firm
69	Treasure Star Co., Ltd.	110015348	25/02/2000	Nc	Nc	Yes	Ngwe Inzaly
70	ARS Gems [ARS]	105949642	29/10/1993	Nc	Nc	No	Ngwe Inzaly Audit Firm
71	Yadanar Pyi Phyo Aung Gems Co., Ltd	174126674	19/06/2001	Gems	Nc	No	N/A
72	Jade Padatar Gems Co,Ltd	115325728	16/03/2004	Nc	Nc	Yes	Nc
73	Ruby Dragon Company	177490903	22/12/1995	Gem/ Jade Mining	Nc	Yes	U Kyaw Nyunt
74	Northern Jade World	111092141	30/05/2012	Gemstone Production	Jewelry Production	Yes	Daw Sandar Aye
75	Kaung Htet Khaing	117705390	12/01/2007	Jade	Nc	Yes	Myanmar Golden Accounting & Auditing Firm
76	Kaung Swan Htet Co	110392907	05/05/2010	Gems	No	Yes	Ngwe Inzaly Audit Firm

N°	Company	Registry Number	Founding date	Core business activities	Secondary business activities	Certified FS	Auditor Name
77	Shwe Ywat Hlwar	102607236	22/10/2003	Gems	Nc	No	N/A
78	Same Lei Yadanar Win Co (SLYW)	103758491	03/04/2012	Jade Gems & Jewellery	Nc	Yes	Myat Lwin Moe
79	Hpakan King Gems & Jewellery Co. Ltd	1455/2009-2010	07/01/2010	Nc	Nc	Yes	FOCUS CONSULTING GROUP LTD
80	Agga Yadanar Jade Gems & Jewellery Co., LTD	117141772	05/09/2008	Extraction de gemmes	Nc	Yes	Daw Nwe Nwe Toe
81	Shwe War Myae (mandalay)	1735/1999-2000	24/07/2013	Nc	Nc	Yes	FOCUS CONSULTING GROUP LTD
82	Delta Land	104724434	22/11/1995	Gems Production	Nc	Yes	FOCUS CONSULTING GROUP LTD
83	Seine Lone Aung	1477/2009-2010	12/01/2010	Nc	Nc	Yes	FOCUS CONSULTING GROUP LTD
84	Aung Hein Minn	102150392	02/08/2004	Nc	Nc	Nc	Nc
85	Kyauk Seinn Sun Shwin Jade Gems & Jewellery Co Ltd	103832675	03/04/2012	Jade Gems & Jewellery	Nc	Yes	Myat Lwin Moe
86	Yadanar Aung Tun Tauk	100379252	15/08/2003	Gems	Nc	Yes	Sein Win & Associates Accounting, Auditing & Consultancy Services
87	U YA GEMS	135456713	08/10/1999	Jade	Nc	No	N/A
88	Chaow Brothers Gemstone Enterprise Ltd	150335590	20/11/1995	Nc	Nc	No	MTO-1 (SAS)
89	Myat Yamon	118936019	29/12/1995	Gems	Nc	Yes	Self-Assessment System
90	Nay La Pwint	106846650	27/12/1995	Nc	Nc	Yes	Daw San Kyi
91	Ma Li Kha Gem Stone Co	105456425	Nc	Jade	Nc	Yes	U San Tun
92	Wan Full	105806833	22/12/1995	Jade	Nc	Yes	Daw Thant Myat Win
93	Aung Tu Ka Dana	104728448	13/10/2003	Other mining and quarrying	Nc	Yes	Daw Than Myat Win
94	Yadanar Moe Myay	164972941	26/03/2004	Gems	Nc	No	N/A
95	Shein Family gems Co., Ltd.	147273711	22/10/2003	Gems	Nc	No	N/A
96	Thein Gabar Aung	115025554	27/10/2004	Gems	No	Yes	FOCUS CONSULTING GROUP LTD.
97	Jade Treasure	105726791	10/07/2006	Gems	No	No	Ngwe Inzaly Audit Firm
98	Lawka Nandar	101487253	13/05/2011	Jade Business	Nc	Yes	U Zaw Lwin
99	Ngwe Si Hein	114898813	03/03/2000	Jade	Nc	No	N/A
100	Myat Pan Khaing	Nc	Nc	Nc	Nc	Nc	Nc
101	Lon Hai	134823119	01/08/1997	Gemstone Mining and Trading	No	No	N/A
102	Goldend Light gems	129792604	22/01/2004	Jade Production	No	Yes	FOCUS CONSULTING GROUP LTD

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103	Hein Aung Lin Htet Jade Co. Ltd	111951209	04/06/2012	Jade Production	No	Yes	FOCUS CONSULTING GROUP LTD
104	Phar Kant Sai Bon						
105	Thigi Myintzu Yadanar	106825963	26/12/2011	Gems	No	Yes	FOCUS CONSULTING GROUP LTD.
106	Seinn Nay Chi Gems & jade company	110657528	09/12/2011	Jade	Nc	No	N/A
107	Seine Light	104639151	16/07/2007	Jade	Nc	Yes	Nc
108	New Lucky Green Gems	140515442	22/12/1995	Jade Mining	No	Nc	Nc
109	Mya San Dar (MSD)	107669450	20/11/2002	Production of Jade	Nc	Nc	Nc
110	Jade Thazin	113784563	04/05/2012	Jade Production	No	Yes	FOCUS CONSULTING GROUP LTD
111	Kaung Su Aung	107642706	25/11/2002	Production of Jade	Nc	Nc	Nc
112	Kachin National Development	112066055	27/12/1995	Jade	Nc	Yes	Than Than Win & Associates
113	Jade Thapyae Co.,ltd	114035033	04/10/2012	Production of Jade	No	Yes	FOCUS CONSULTING GROUP LTD
114	Kaung Wai Yan Co	110033095	24/6/2005	Nc	Nc	Yes	ZIN WAI B.COM;(AA);C.P.A(210) CERTIFIED PUBLIC ACCOUNTANT
115	Green Diamond Gems & Jewellery Co. Ltd	102774922	23/08/2010	Jade Extracting	Nc	Yes	DAW YEE YEE KHIN Focus Consulting Group Ltd.
116	Lucky Star Jade Group	162113011	12/03/2004	Nc	Nc	Yes	Daw Khin Thin Kyu Audit Firm
117	Yadanar Si	108857250	05/01/1996	Jade	Nc	Yes	Daw Yin Yin
118	All Right Company	113781203	04/04/2012	Jade Production	No	Yes	FOCUS CONSULTING GROUP LTD
119	Jewel Crown Company	105805837	09/08/2006	Gems	No	No	Ngwe Inzaly Audit Firm
120	Kaung Mon Yadanar	103303893	10/05/2004	Gems	Nc	Yes	Ngwe Inzaly
121	Green Earth Gems Co., Ltd	112434720	22/05/2001	Gems & Jewellery Mining	No	Yes	CPA- DAW TANT MYAT WIN
122	Global Sun Light	102255585	26/07/2013	Jade Extracting	Nc	Yes	DAW YEE YEE KHIN Focus Consulting Group Ltd.
123	Aung Hlaing Kyawlwa	100251507	10/04/2006	Gemstone (Rough Gem)	No	No	N/A
124	Value Standard	135428841	28/06/2005	Jade Business	Nc	Yes	Nc
125	Seine Aung	100315440	14/11/1995	Gems	Nc	No	N/A
126	Myint Shin Gems Co.,LTd	106333483	06/08/2003	Nc	Nc	Yes	Daw Tin Tin Kyaw
127	U Kyaw Thet	Nc	Nc	Jade	Nc	Yes	U Kyaw Thet
128	Buu Gar	110499930	15/11/1995	Jade	Nc	No	N/A

N°	Company	Registry Number	Founding date	Core business activities	Secondary business activities	Certified FS	Auditor Name
129	Jade Pioneer Mining Limited	102272692	28/06/2016	Nc	Nc	Nc	Nc
130	Kyauk Seinn Minn Gems	103472296	15/11/1995	Jade	Nc	Yes	U Myaing
131	Yi Li Fa [YLF]	141482904	22/12/1995	Gems	Nc	Yes	Daw Thin Thin Soe
132	Pyi Yadanar	195679029	24/11/2004	Gems Purchasing and Selling	Nc	No	N/A
133	MELODIOUS GEMS COMPANY LIMITED	105609108	28/06/2006	Gems	Nc	Yes	Daw San Kyi
134	Myanmar Thura [MTY]	105600755	29/09/2003	Nc	Nc	Yes	Daw San Kyi
135	Kyaut Seinnn Karbarkyaw	100818132	15/05/2012	Gems production	Nc	No	N/A
136	Hole In One	149493417	24/09/1996	Jade	PEARL	Yes	Focus
137	Nay Chi Yadanar Co., Ltd.	165715756	28/01/2010	Gems	Nc	No	N/A
138	Kyauk Seinn Wingabar Jade Gems & Jewellery Co.,Ltd	133473467	05/04/2012	Jade Gems & Jewellery	Nc	Yes	Myat Lwin Moe
139	Ou Ryu Sein Yadanar	102529812	28/02/2006	Jade	Nc	Yes	Daw Nyunt May
140	Kaung Htike	102673077	07/10/2006	Other mining and quarrying	Nc	Yes	Daw Than Myat Win
141	Sein Minn Yadanar	152332807	15/11/1995	Rough Jade	Nc	No	N/A
142	Treasure Five Star Co., Ltd	111142246	01/01/2013	Jade	Nc	Yes	Than Than Win
143	Kyei Linn Gems & Jade Company	11522 6118	19/04/2000	Jade	Nc	Nc	Nc
144	Silver Sand Stone Gems co.,	100900424	25/02/2008	Jade	PEARL	Yes	ZIN WAI
145	Wan Chang	112714472	07/03/1996	Jade	Nc	Yes	U Tin Sein
146	Khaing Lon Gems Co., Ltd	116262495	29/12/2005	Jade	Business of Culturing, Production and Selling of Pearls	Yes	Daw Thant Myat Win
147	PON TUNG THARR GEMS COMPANY LIMITED	109634336	14/02/2011	Gems	Nc	Yes	Thant Myat Win
148	Palaung National						
149	Treasure Linn Gems Co.,Ltd	100375257	27/06/2008	Gems	Nc	Yes	SEIN WIN & ASSOCIATES Accounting,Auditing&Consultancy Services
150	Treasure White Lotus	151284108	22/08/2003	Gems	Nc	No	N/A
151	Sein Thura San	108045671	04/12/2006	MINING (GEMS) AND SOLD TO EMPORIEM IN NAYPYITAW	No	Yes	U ZIN WAI (ZIN AND FRIEND AUDIT FIRM)



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152	Aung Shwe Kabar	114585149	15/01/2003	Gems & jewellery production	Agriuculture	Yes	JF Group
153	San Taw Win	100717417	20/06/2015	Jade	Nc	Yes	Daw Yin Yin Htay
154	Jade Crystal Palace	107791612	29/12/1995	Gems	Nc	Yes	Daw San Kyi
155	Shwe Hwa	111532001	Nc	Nc	Nc	Nc	Nc
156	Aung Myin Thu Gems & Jewellery Co.,Ltd	108425016	10/01/1996	Production of Jade	Nc	Nc	Nc
157	Gold Jade	101104931	22/11/1995	Jade	Nc	Yes	U Sun Tun (B.A,CPA, F.B.S.A)
158	Thet Hein Gems & Jewellery Co;Ltd.	129590645	16/07/2003	Nc	Nc	Nc	Nc
159	Myanmar Rich Land Gems	101665933	21/07/2000	Jade	Nc	Yes	ZIN & FRIENDS AUDITORS
160	MEGA STAR JEWEL LIMITED	110022956	24/06/2005	Nc	Nc	Yes	ZIN WAI B.COM;(AA);C.P.A(210) CERTIFIED PUBLIC ACCOUNTANT
161	Kan Sein Pwint	106369615	02/11/2006	Gem	Nc	No	N/A
162	Myanmar Winning Gate (GMWG)	104797172	10/10/2007	Nc	Nc	Nc	Nc
163	San Family	114020222	30/03/2006	Jade	No	Yes	FOCUS CONSULTING GROUP LTD
164	HONG YENG YEE SHIN GEMS & JADE COMPANY LTD	113631473	26/03/1997	Jade Production	No	Yes	FOCUS CONSULTING GROUP LTD
165	Green Comet gems& Jade company	188092349	28/11/2006	Nc	Nc	Yes	Daw Khin Thin Kyu Audit Firm
166	Gandawin Kyaut Myat Garden	162206370	11/05/2005	Nc	Nc	No	N/A
167	Kaung Taw Myay	105747071	15/01/2009	Jade	No	Yes	Zaw Lwin & Associates
168	U Hla Soe Oo	NPT-52	04/12/2013	Nc	Nc	Nc	Nc
169	80000	2302/2011-2012	19/10/2011	Jade Mining	Nc	Yes	U Zaw Lwin
170	Than Lwin Kyaw Kyar	111158657	19/01/2005	Gems & Jade	Nc	Yes	Daw Win San FOCUS Consulting Group Ltd
171	Kyauk Myet Shwe Pyi	100174359	29/12/2015	Jade Gems & Jewellery	Nc	No	Myat Lwin Moe
172	Moe Brothers	102595246	13/11/1995	Jade Production, Gems&Jewellery Shop	Electronic Devices and water supply pumps selling	Yes	Nc
173	Innwa Nay Chi Co	107341439	09/10/2012	Nc	Nc	Yes	Ngwe Inzaly Audit Firm
174	Jade Master	115160419	11/02/2012	Jade Production	No	Yes	FOCUS CONSULTING GROUP LTD
175	Taw Win Jade Dragon	116621991	17/10/2014	Jade	Jade	Yes	U Sai Soe Win
176	Shwe Tun Win	103437687	15/11/1995	Jade	Nc	Yes	U Myaing

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177	Kan Thar Yar Gems Co.,Ltd.	109595225	28/08/2009	Jade	Nc	Yes	Daw Yin Yin
178	Jade Brothers	115037854	04/10/1997	Jade	Nc	Yes	Than Than Win & Associates
179	Myat Myittar Mon (G & J) Co.,Ltd						
180	Pang Huke Duwa Co.,Ltd	103768306	20/11/1995	Jade	Nc	Yes	Daw Tin Tin Kyaw
181	Shwe Pyi Thar Gems Trading and Faceting Co-op.,Ltd	KHA-3313/SALA/CHAN AYE THAR SAN	12/10/1995	Nc	Nc	Yes	Daw Win San
182	Khant Shwe Pyi Co.,Ltd	102548493	27/04/2016	Trading	Nc	Yes	Win Aung
183	Nilar Yoma	163055198	29/01/1996	Gems	Nc	No	N/A
184	Lyan Shan	108840048	14/11/1995	Jewellery Company	No	Yes	FOCUS CONSULTING GROUP LTD
185	Yadanar Myat Noe Thwe Gem	106843244	09/10/2012	Gems	No	No	Ngwe Inzaly Audit Firm
186	Kyi Wai Yan	102754441	27/02/2012	Gems	No	No	FOCUS CONSULTING GROUP LTD.
187	Yadanar San Shwin Gem	105217382	13/03/2001	Jade Production	No	Yes	FOCUS CONSULTING GROUP LTD
188	HERA Co.,Ltd (Hee Ya Gems)	100702312	04/10/2006	Rough Gem	Nc	Yes	U Sun Tun
189	MOGOK PRIDE	107022201	15/11/1995	Mining	Jewellery Shop	Yes	Daw San Kyi,Daw Sany Kyi Audit firm
190	EXCELLENT RUBY & SAPPHIRE	113304022	28/01/2020	Nc	Nc	Nc	Nc
191	CHATKIYAY GEMS & JEWELLERY CO.,LTD	108838345	24/07/2012	Gems	Nc	Yes	Nc
192	SHWE NAING TUN	102764757	05/08/2009	Jade Mining	No	No	Daw Khin Win Division 3
193	R.B.G	101387704	10/02/2005	Gem Mining	Nc	Yes	U Kyaw Nyunt
194	KHINE THIT SAR	100833727	22/07/2002	Gem Mining	Nc	Yes	U Kyaw Nyunt
195	Myanmar Lar Ba Gems Co., Ltd.	111053472	24/09/2009	Gems Mining	Nc	Yes	Daw San Kyi
196	METAL METERO	105818165	11/11/2011	Gems	Nc	Yes	Daw Than Than Win
197	RUBY TIGER	115697390	05/02/2011	Gems	Nc	No	N/A
198	THAN HTIKE LU	147118708	13/06/1996	Gems	Construction	Yes	Daw Nyunt May
199	BIRDS GEM	108269669	23/11/2007	Gem mining	Nc	Yes	Daw Nwe Nwe Toe
200	ZABUKYAWAUNG	107810935	03/10/2006	Gems production	Nc	Yes	U Zin Wai ,Zin and friends Audit firm
201	KYAN FAMILY	104947204	05/04/2006	Gems Mining	No	Yes	Nc
202	HTAY PAING	105130775	26/03/2004	Gems Production	Jewellery Shop	Yes	Daw Thant Myat Win, FOCUS Consulting Group
203	RED MOUNTAIN	101117995	10/10/2005	Nc	Nc	Yes	U Kyaw Nyunt
204	KYAW NAING & BROTHERS	151554474	10/08/1999	Jade Production	Nc	Yes	Thin Thin Soe

N°	Company	Registry Number	Founding date	Core business activities	Secondary business activities	Certified FS	Auditor Name
205	LAW LU	136924281	14/05/2001	Gems Production	Nc	Yes	Daw Win San, FOCUS Consulting Grooup LTD
206	MYANMAR SITHU	106648646	17/11/1995	Jade	Nc	Yes	Daw Nyunt Nyunt Yi
207	THEITHI AUNG NGWE MOE	119414296	24/12/2009	Jade	Jade	Yes	U Sai Soe Win
208	Pwint Phoo Nadi	113379510	24/08/2009	Nc	Nc	Yes	ZIN & FRIENDS
209	Myanmar Economic Corporation	105444192/2019	Nc	Nc	Nc	Yes	Daw Mi MI Hlaing

N°	Company	Registry Number	Founding date	Core business activities	Secondary business activities	Certified FS	Auditor Name
1	Myanmar Ruby Enterprise Co.,Ltd	1499/1995-1996	14/12/1996	Gem	Gold	Yes	kyu kyu win & Associate Service Co.,Ltd
2	Duwon Star (Gem&Jwellery) Co.,Ltd	1064/2012-2013	19/06/2012	Nc	Nc	N/A	N/A
3	Dana Thedi Star (Gem&Jwellery) Co.,Ltd	1065/2012-2013	19/06/2012	Nc	Nc	N/A	N/A
4	Hawk Star (Gem & Jewellery) Co.,Ltd	1069/2012-2013	19/06/2012	Nc	Nc	N/A	N/A
5	Pone Nyet(Gem & Jewellery) Co.,Ltd	1067/2012-2013	19/06/2012	Nc	Nc	N/A	N/A
6	Sabae (Gem & Jewellery) Co.,Ltd	1068/2012-2013	19/06/2012	Nc	Nc	N/A	N/A
7	Seik Tra Star (Gem & Jewellery) Co.,Ltd	1070/2012-2013	19/06/2012	Nc	Nc	N/A	N/A
8	ThitSarPann (Gems & Jewellery) Co.,Ltd	1066/2012-2013	19/06/2012	Nc	Nc	N/A	N/A

## Other Minerals sector

N o.	Company	Registry Number	Founding date	Core business activities	Secondary business activities	Certified FS	Auditor Name
1	NATIONAL PROSPERITY COMPANY LIMITED	4327	15/03/2012	Gold Mining	N/C	No	N/A
2	MYANMAR ECONOMIC CORPORATION LIMITED						
3	GEO ASIA INDUSTRY & MINING COMPANY LIMITED	116058790	19/04/2006	Gold Mine	N/C	No	N/A
4	CORNERSTONE RESOURCES (MYANMAR ) LTD.	117328058	06/01/2000	Exploration and Feasibility Studies Leading to Zinc Mining and Processing	N/C	Yes	FOCOUS CONSULTING GROUP LTD (DAW THANT MYAT WIN)
5	ETERNAL MINING COMPANY LIMITED	107350594	13/11/2006	Mining	N/C	Yes	Maung Maung Hteik & Associate
6	MYANMA ECONOMIC HOLDINGS PUBLIC COMPANY LIMITED	156387282	27/04/1990	N/C	N/C	Yes	U Hla Tun & Associates Limited
7	KAYAH STATE MINERAL PRODUCTION COMPANY LIMITED	76212002-2003	28/02/2002	N/C	N/C	Yes	kyu kyu win & Associates Services Co.,Ltd
8	SHWE MOE YAN COMPANY LIMITED	101082474	24/03/2011	Gold	N/C	Yes	Royal Treasure Audit Firm (Daw Khin Than Oo)
9	GPS JOINT VENTURE COMPANY LIMITED	109035068	09/01/2013	Lead mining, processing and sales	N/C	No	In progress
10	SHWE TAUNG MINING COMPANY LIMITED	178268163	10/05/2005	N/C	N/C	Yes	UTW(Myanmar)Limited
11	DELCO LIMITED	125445020	25/09/2007	Tin Tungsten Mining	N/C	Yes	Daw Thant Myat Win
12	MAX (MYANMAR) COMPANY LIMITED	141692534	17/12/2007	Cement	N/C	Yes	Myanmar Vigour & Associates Limited
13	FIRST RESOURCES COMPANY LIMITED	101585220	18/6/2012	08-Other mining and quarrying	N/C	NO	
14	PACIFIC LINK CEMENT INDUSTRIES LIMITED						
15	WIN MYINT MO INDUSTRIES COMPANY LIMITED	1928	25/08/2008	Mining of metal ores Other mining and quarrying Mining support service activities	N/C	Yes	WIN GROUP
16	No.(2)Heavy Industry, Ministry of Industry	N/C	N/C	Cement Factory, Glass Factory	N/C	N/C	N/C
17	MYANMAR PONGPIPAT COMPANY LIMITED	106803838	12/08/1999	N/C	N/C	Yes	Daw Than Than Win
18	NGWE YI PALE MINING COMPANY LIMITED	155743298	22/12/2004	N/C	N/C	Yes	N/C
19	NEW DAYS ASIA MINING COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C
20	HTOO INTERNATIONAL INDUSTRY GROUP COMPANY LIMITED	131415710	11/01/2005	N/C	N/C	Yes	Famat Audit Firm
21	HARBOR STAR MINING COMPANY LIMITED	110005199	12/04/2014	Lead mining, processing and sales	N/C	NO	
22	MANDALAY GOLDEN FRIEND MINING CO., LTD.	1288	01/11/2007	N/C	N/C	N/C	N/C
23	MYANMAR GOLDEN POINT FAMILY CO., LTD.	109529788	24/02/1997	Mining	N/C	Yes	Maung Maung Hteik & Associate

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24	THAN TAW MYAT COMPANY LIMITED	179607255	01/02/2010	N/C	N/C	NO	
25	TUN THWIN MINING COMPANY LIMITED						
26	MANDALAY DISTRIBUTION & MINING COMPANY LIMITED	104054625	24/02/2019	N/C	N/C	Yes	N/C
27	YCDC	N/C	N/C	Mining(Coal), Cement Factory	N/C	NO	
28	SAN LIN INTERNATIONAL EXPORT & IMPORT COMPANY LIMITED	163480255	13/12/1993	Iron, Lead Pb	N/C	Yes	U Zin Wai
29	KAN PWINT OO MINING COMPANY LIMITED	110622678	04/04/2012	Coal Mine	N/C	Yes	U Zin Wai
30	TOP TEN STAR PRODUCTION CO., LTD.	117343227	20/07/2009	Large Scale Production of Lead Concentrate	N/C	Yes	Khaing Win & Associates Audit Firm
31	HEAY HEIN COMPANY LIMITED	102961366	10/06/2015	Coal	NO	Yes	Internal revenue department, Loilin Division,Southern Shan State.
32	NGWE KABAR MYANMAR COMPANY LIMITED	101201996	07/08/1999	Production Tin-Tingsten and Mixed Ore and Exporting	NO	Yes	Myat Lwin Moe
33	MYAUK KYUN THU MA MA MINING & REFINERY COMPANY LIMITED	103947189	11/02/1999	Gold Production	Cu & Au Prospecting, Exploration & Feasibility Study	(Yes)	U Than Aung (PA-847)
34	XIE SHAN MINING PRODUCTION & MARKETING COMPANY LIMITED	104418821	N/C	N/C	N/C	N/C	N/C
35	DRAGON CEMENT COMPANY LIMITED	117675386	12/05/1999	N/C	N/C	Yes	U Kyaw Nyunt
36	PRINCE MANUFACTURING COMPANY LIMITED	102093003	02/01/2009	Production (Lead Carbonate & Lead Ores)	Construction	Yes	Daw Sandar Aye
37	HTAT YEE LINN MINING & REFINERY COMPANY LIMITED	103472008	25/02/1999	Gold Production	N/C	(Yes)	U Than Aung (PA-847)
38	MYAY NAGAR MINING COMPANY LIMITED	103600111	08/08/2005	N/C	N/C	YES	Daw San Kyi
39	THA BYU MINING COMPANY LIMITED						
40	YE HTUT KYAW MINING COMPANY LIMITED	115122282	24/11/2009	N/C	N/C	YES	Zin Wai B.Com;(AA); C.P.A (210)
41	MYANMAR TIN -TUNGSTEN COMPANY LIMITED	106131341	25/02/1999	Tin Production	N/C	Yes	U Myaing,
42	Myanmar Yang Tse Copper Ltd	19 FC	11/08/2011	N/C	N/C	Yes	Daw Win Htay and Associates
43	Eden Energy & Natural Resources Development Co., Ltd	118193601	27/09/2002	Coal Mining, Braite Mining	N/C	NO	
44	Kanbawza Industries Ltd	594	07/09/2001	N/C	N/C	N/C	N/C
45	MYANMAR WANBAO MINING COPPER LTD	157050907	10/09/2010	PROCESSING AND MARKETING OF CATHODE COPPER	N/C	Yes	U HLA TUN & ASSOCIATES LIMITED
46	HTAR WA YA						

N o.	Company	Registry Number	Founding date	Core business activities	Secondary business activities	Certified FS	Auditor Name
47	MYANMAR CNMC NICKEL COMPANY LIMITED	108341157	23/09/2008	MINING, MINERAL PROCESSING & MARKETING OF FERRONICKEL	N/C	Yes	Daw Phyu Phyu Khine
48	24 HOUR MINING & INDUSTRY COMPANY LIMITED	103687241	19/09/2007	N/C	N/C	NO	
49	A & A NATURAL RESOURCES DEVELOPMENT CO., LTD	104959474	09/07/1993	Tin, Tungsten, Mix Ores Mining	N/C	No	Ngwe Inzaly Audit Firm
50	ASIA PHYO MINING COMPANY LIMITED	108410094	10/02/2011	Mining of Coal and Lignite	N/C	Yes	Khin Thinn Kyu
51	BLUE DIAMOND CEMENT COMPANY LIMITED	111788340	30/12/2014	Transportation	Mining(Limestone), Joint venture with a foreign Co.,(LGI) forming HCL Co.,Ltd.for manufacturing & trading of cement.	Yes	Famat Audit
52	DAGON MINING COMPANY LIMITED	104028462	27/02/2006	Mining of Coal and Lignite	N/C	Yes	Khin Thinn Kyu
53	DIAMOND SHARK MINING COMPANY LIMITED	102404661	17/01/2007	Mining	N/C	Yes	Myat Lwin Moe
54	Directorate of Military office of Chief of Defence Industries, Ministry of Defence						
55	GREEN ASIA COMPANY LIMITED	129020334	15/11/1996	N/C	N/C	Yes	U Khin Aung
56	GREEN STRATEGIC MINING COMPANY LIMITED						
57	GROUP OF FOUR MINING COMPANY LIMITED	100430363	23/07/2010	Coal	N/C	Yes	Sein Win, SEIN WIN & ASSOCIATES
58	HTUT KHAUNG KYAW MINING COMPANY LIMITED	105552475	05/06/2012	Mining	N/C	Yes	Daw Thant Myat Win B.Com,(Q), C.P.A.Dip.IFR Dip, In Business Law Certificate Public Accountant
59	JUNE CEMENT INDUSTRY LTD.	9	01/04/2011	Cement Product	N/C	N/C	N/C
60	LINN PYAE MINING COMPANY LIMITED	116551748	27/08/2008	N/C	N/C	Yes	U Tin Latt
61	LOI CHAI NAGAR MINING COMPANY LIMITED	110744463	29/03/2012	Coal Mining	N/C	Yes	U Khin Mg Than, Than&Friends Accounting,Auditing&Consultancy Services
62	MAY FLOWER MINING ENTERPRISES LIMITED	100784866	12/05/1998	Gold and Coal Production	N/C	Yes	U Myat Lwin Moe
63	MINING WORLD COMPANY LIMITED						
64	MOUNT CHING YING MINING COMPANY LIMITED	105617070	03/03/2006	Marble	N/C	NO	
65	MYANMAR APEX MINING CO., LTD	101715809	27/06/2001	N/C	N/C	Yes	U Tin Latt

N o.	Company	Registry Number	Founding date	Core business activities	Secondary business activities	Certified FS	Auditor Name
66	MYANMAR NAING GROUP MINING COMPANY LTD	112682317	22/12/2010	Limestone Production	N/C	NO	
67	MYANMAR SIMCO SONG DA JOINT STOK COMPANY LIMITED	110108567	09/04/2012	Marble Production at Nay Pu Taung	N/C	Yes	U Tin Latt
68	MYINT INVESTMENT GROUP COMPANY LIMITED	116291568	21/07/2011	Mining of Coal and Lignite	N/C	Yes	Khin Thinn Kyu
69	No.(3) Heavy Industry. Ministry Of Industry						
70	SHWE PAUK PAUK MINING COMPANY LIMITED	118049551	29/09/2009	Coal Mining	Hard Coke	YES	Daw Nwe Nwe Toe
71	SHWE PIN LE MINING & INDUSTRY COMPANY LIMITED	109973629	07/01/2009	Tin	N/C	No	N/A
72	SILVER BRIGHT COMPANY LIMITED	116492032	08/06/2004	Mix-Ole	N/C	YES	U Tin Latt
73	THE SILVER LION MINING COMPANY LIMITED	115516027	12/08/2004	Marble Rock Mining	Trading	No	N/A
74	THIHA THANT HEIN MINING COMPANY LIMITED	116447428	29/09/2008	Coal	N/C	YES	U Tin Latt
75	TRIPLE "A" CEMENT INTERNATIONAL COMPANY LIMITED	102861965	29/12/2009	Cement Product	N/C	N/C	N/C
76	U E EXPORT IMPORT COMPANY LIMITED	119718384	07/06/1993	Coal and Limestone	N/C	YES	U Than Aung
77	UNITED CEMENT COMPANY LIMITED						
78	YIG COMPANY LIMITED	108744308	04/05/2015	Production / Manufacturing	No	YES	Daw Thant Myat Win (Focus Consulting Group Ltd)
79	YOUNG INVESTMENT GROUP COMPANY LIMITED	109000574	13/01/2011	Production / Manufacturing	No	YES	Daw Thant Myat Win (Focus Consulting Group Ltd)
80	SEA SUN STAR MINING PRODUCTION & MARKETING COMPANY LIMITED						
81	ZABU TALU MINING COMPANY LIMITED	104449093	N/C	N/C	N/C	N/C	N/C
82	RUBY DRAGON MINING COMPANY LIMITED	100678624	10/10/2005	N/C	N/C	YES	U Kyaw Nyunt
83	HTAY FAMILY COMPANY LIMITED						
84	SEIN CHI LIN MINING CO., LTD.	106135533	29/02/2012	Coal	Teak Plantation	No	N/A
85	AUNG HTUN LINN SHEIN WIN MINING & REFINERY COMPANY LIMITED	103580234	25/02/1999	Gold Production	N/C	YES	U Than Aung (PA-847)
86	Future Mining Co.,Ltd						
87	Future Engineering Gold Mining	26078	09/10/1998	Gold Mining	N/C	No	N/A
88	SHWE MYINT THAUNG YINN INDUSTRY & MANUFACTURING COMPANY LIMITED						
89	MYANMAR MYO KO KO MEDICAL INSTRUMENT COMPANY LIMITED						
90	SAT WINE INN ARR MINING COMPANY LIMITED						
91	SHWE SAPAR MINING COMPANY LIMITED	106564965	18/07/2005	Mining	N/C	N/C	N/C

N o.	Company	Registry Number	Foundin g date	Core business activities	Secondary business activities	Certifi ed FS	Auditor Name
92	NAN KANAUNG MINING & ENGINEERING COMPANY LIMITED	103801990	05/12/2008	Maganese Dioxide Production	N/C	Yes	N/C
93	NEW ERA GOLD COMPANY LIMITED	101853578	26/11/2003	Marbel	N/C	No	N/A
94	SHWE PYI NAGAR COMPANY LIMITED	10614911	19/01/2011	N/C	N/C	No	N/A



## Annex 8 Legal ownership

### Oil and Gas sector

No	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity (yes/no)	Name of the Stock exchange
1	Gold Petrol Joint Operating Company Inc., (GJOC Inc.)	Goldwater Company Limited	Indonesia	60%	Yes	SGX
		North Petrol Operating Inc	China	40%	No	SOE
2	MPRL E&P Pte Ltd. ( Yangon Branch )	MPRL E&P Pte Ltd.	British Virgin Island	100%	No	N/C
3	PC Myanmar (Hong Kong) Limited	PC (Myanmar) Holding Limited	Hong Kong	100%	No	N/C
		PETRONAS International Corporation Limited	Malaysia	0%	No	N/C
4	Posco Daewoo Corporation (Myanmar E&P Office)			100%		
5	PTTEP International Ltd.	PTTEP International Limited	N/C	100%	N/C	N/C
6	Total E&P Myanmar	Total E&P Myanmar	French	100%	Yes	Paris
7	Gail JJ India Ltd					
8	Korea Gas Corporation					
9	Nippon Oil Exploration (Myanmar) Ltd					
10	ONGC Videsh Ltd.,					
11	Unocal Myanmar Offshore Co., Ltd.	Chevron Global Ventures, Ltd.	Bermuda	100%	No	N/A
12	Asia Orient International Ltd. (CJs Oc Nobel Oil)					
13	Bashneft International B.V. (Myanmar Branch)					
14	Berlanga Myanmar Pte Ltd., (Myanmar Branch)	Berlanga International Pte Ltd	Singapore	100%	No	N/C
15	BG Exploration & Production Myanmar Pte. Ltd. (Myanmar Branch)	BG Myanmar Pte. Ltd.	Singapore	100%	No	N/A
16	Brunei National Petroleum Company Sdn Bhd (PB Myanmar)					
17	CAOG PTE LTD (MYANMAR BRANCH)	Berlanga International Pte Ltd	Singapore	100%	No	N/C
18	CFG Energy Pte Ltd.,	CFG ENERGY PTE. LTD.	Singaporean	80%	No	N/C
		TRG M15 PTE. LTD.	Australian	10%	No	N/C
		CBG PTE. LTD.	Myanmar	10%	No	N/C
19	ENI Myanmar B.V. (Myanmar Branch)	Eni Spa	Italian	100%	Yes	NYSE
20	IsTech Energy EP-5 Pte Ltd., (Myanmar Branch)	NC	N/C	N/C	N/C	N/C
21	Jubilant Oil & Gas Pte. Ltd.					
22	North Petro-Chem Corporation Myanmar Ltd. (NPCMM)					

No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity (yes/no)	Name of the Stock exchange
23	Ophir Myanmar (Block AD-3) Limited (Myanmar Branch)	PT Medco Energi	Indonesian	100%	Yes	IDX
24	Pacific Hunt Energy Corporation (Myanmar Branch)	ARTHUR JOSEPH PORCARI	United States of America	0%	N/A	N/A
		ERIC CLAY PRIM	United States of America	0%	N/A	N/A
		PAUL ANDREW TURNER	British	0%	N/A	N/A
		KARL JAMES EBELING	United States of America	2%	N/A	N/A
		PETER LAURENCE DALRYMPLE	United States of America	1%	N/A	N/A
		RAY EDWARD JONES	United States of America	0%	N/A	N/A
		BRYCE ALAN HARRELL	United States of America	1%	N/A	N/A
		ROBERT CHESTER WESOLEK	United States of America	2%	N/A	N/A
		LYNN MAUREEN ANDERSON	Canadian	0%	N/A	N/A
		MARK ANDREW VANRY	Canadian	0%	N/A	N/A
		BRIAN JOHN BUCKLEY	Canadian	0%	N/A	N/A
		CARSON JOHN PHILLIPS	Canadian	0%	N/A	N/A
		CLEO ALLEN	Canadian	0%	N/A	N/A
		JASON ROHNIL SUNDAR	Canadian	0%	N/A	N/A
		ROBERT JAMES BEADLE	Canadian	0%	N/A	N/A
		DARCY JAMES WILL	Canadian	0%	N/A	N/A
		MARTIN MALUS	Canadian	0%	N/A	N/A
		COLIN CAMPBELL ROTHERY	Canadian	1%	N/A	N/A
		PATRICK ALEXANDER ROBINSON	Canadian	0%	N/A	N/A
		NANCY MARIE MARCELLE ROTHERY	Canadian	1%	N/A	N/A
		MORGAN TINCHER	Canadian	0%	N/A	N/A
		JAMES ANDREW HUTTON	Canadian	2%	N/A	N/A
		DANIEL ANTHONY CARRIERE	Canadian	1%	N/A	N/A
		KOSTANTINOS GEORGAKOPOULOS	Canadian	0%	N/A	N/A
		GRANT MOGENS PETERSEN	Canadian	2%	N/A	N/A
		KWAN CHONG WAH	Singaporean	0%	N/A	N/A
		YEO KOK TONG	Singaporean	0%	N/A	N/A

No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity (yes/no)	Name of the Stock exchange
		TAN HWEE LUNG AGNES	Singaporean	0%	N/A	N/A
		NEOH CHIN CHEE	Malaysian	1%	N/A	N/A
		NEO KAH KIAT	Singaporean	1%	N/A	N/A
		CHIA KIA HWEE ROYSTON	Singaporean	0%	N/A	N/A
		GREGG JAMES SEDUN	Canadian	0%	N/A	N/A
		DENNIS HENRY HOESGEN	Canadian	0%	N/A	N/A
		LEIGHTON PATRICK BOCKING	Canadian	0%	N/A	N/A
		ERIC HENRY HOESGEN	Canadian	0%	N/A	N/A
		JAMES FRANCIS HEAPS	Canadian	0%	N/A	N/A
		CARY DENNIS PINKOWSKI	Canadian	0%	N/A	N/A
		ANTHONY ALVARO	Canadian	0%	N/A	N/A
		HOLLOMAN VALUE HOLDINGS, LLC	United States of America	22%	No	NA
		NOVA TREK CAPITAL INC.	Canada	0%	No	NA
		G.K. BRAUN LIMITED	Canada	0%	No	NA
		STEVENSON HOLDINGS, LTD.	United States of America	1%	No	NA
		PENTICOM INVESTMENTS INC.	Canada	1%	No	NA
		COUNTRY ROCK RESOURCES LTD.	Canada	0%	No	NA
		VDST HOLDINGS LTD.	Canada	0%	No	NA
		EVERONA LIMITED	Hong Kong	0%	No	NA
		UNI-HARVEST INVESTMENTS LIMITED	British Virgin Islands	0%	No	NA
		CARSON ADDISON INVESTMENT TRUST	United States of America	0%	No	NA
		PARKER ADDISON INVESTMENT TRUST	United States of America	0%	No	NA
		LPD INVESTMENTS, LTD.	United States of America	3%	No	NA
		CHELMER INVESTMENTS CORP.	Canada	1%	No	NA
		FIDELITY CLEARING CANADA ULC ITF GRF CONSULTING CORP.	Canada	0%	No	NA
		JLHLC HOLDINGS INC.	Canada	0%	No	NA
		HUTTON CAPITAL CORPORATION	Canada	1%	No	NA
		BMO NESBITT BURNS INC ITF PRIMEVESTFUND AC# 402-21696-29	Canada	1%	No	NA

No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity (yes/no)	Name of the Stock exchange
		THE PETER AND JOANNE BROWN JOINT SPOUSAL TRUST (2015)	Canada	0%	No	NA
		WISDOM POWER VENTURES INC	British Virgin Islands	42%	No	NA
		SEMERU ENERGY (MYANMAR) LIMITED	British Virgin Islands	5%	No	NA
		PI FINANCIAL CORP.	Canada	0%	No	NA
		ALCARON CAPITAL CORP.	Canada	0%	No	NA
		PRESSELLO TRUST	Canada	0%	No	NA
		0958015 B.C. LTD.	Canada	0%	No	NA
		INVESTOR COMPANY ITF RAKESH DHIR A/C 363709E	Canada	0%	No	NA
		CANACCORD GENUITY CORP. ITF ROCKPORT PARTICIPATION INC.	Canada	0%	No	NA
25	Parami Energy Development Company Ltd					
26	Apex Geo Services Co.,					
27	Petronas Carigali Myanmar Inc (PCMI)	PETRONAS International Corporation Limited	Malaysia	100%	N/C	N/C
28	Petrovietnam Exploration Production Corporation					
29	Reliance Industries Ltd.					
30	Shell Myanmar Energy Pte. Ltd. - Yangon Branch	Shell EP Middle East Holdings B.V.	Netherlands	100%	No	N/A
31	SNOG Pte Ltd					
32	Tap Energy (M-7) Co., Ltd. (Statoil)					
33	TRG M15 Pte. Ltd.					
34	Woodside Energy (Myanmar) Pte Ltd	Woodside Energy (Myanmar) Pte Ltd	Singapore	100%	No	Wholly owned subsidiary of Woodside Energy Holdings Pty Ltd, Registered company in Myanmar as "Woodside Energy (Myanmar) Pte Ltd"

No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity (yes/no)	Name of the Stock exchange
		Woodside Energy Holdings Pty Ltd	Australia	100%	No	Woodside Energy (Myanmar) Pte Ltd (Yangon Branch)" Wholly owned subsidiary of Woodside Energy Ltd
		Woodside Energy Ltd	Australia	100%	No	Wholly owned subsidiary of Woodside Petroleum Ltd
		Woodside Petroleum Ltd	Australia	100%	Yes	Australian Stock Exchange (ASX)
35	MOECO Asia Pte. Ltd					
36	SmartE&PInternational Co.,Ltd					
37	United National Resources Development Services Co., Ltd					
38	Century Bright Gold Co., Ltd					
39	Myanmar Petroleum Exploration & Production Co., Ltd.					
40	Royal Marine Engineering Co.,Ltd					
41	Eden Group Co., Ltd					
42	Maurel & Prom Exploration & Production					
43	CNPC International Ltd.					
44	Asia Petroleum Investment Company (APIC)					
45	UPR Pte Ltd.					
46	A-1 Mining Company .Ltd.					
47	Win Precious Resources Pte Ltd.					
48	Palang Sophon Offshore Pte. Ltd. (PSO)					

No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity (yes/no)	Name of the Stock exchange
49	Smart Technical Services Ltd.					
50	A-Lister Services Co., Ltd.					
51	Machinery and Solutions Co., Ltd.					
52	Sun Apex Holdings Ltd.					
53	Young Investment Group Co. Ltd.	U Thiha Aung	Myanmar	80%	N/C	N/C
54	IGE Pte. Ltd.	Daw Nang Swe Htwe	Myanmar	10%	N/C	N/C
		Daw Khin Myint	Myanmar	10%	N/C	N/C
55	UNOG Pte. Ltd.					

## Oil and Gas transportation

No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity (yes/no)	Name of the Stock exchange
1	South East Asia Gas Pipeline Co.,Ltd(Great Ocean Branch)(SEAGP)	CNPC-SEAP Co., Ltd	China	51%	N/C	N/C
		MOGE	Myanmar	7%	N/C	N/C
		POSCO Daewoo Corporation	Korea	25%	N/C	N/C
		ONGC Caspian E&P B.V	India	8%	N/C	N/C
		Gail ( India) limited	India	4%	N/C	N/C
		KG-SEAGP Company Limited	Korea	4%	N/C	N/C
2	Southeast Asia Crude Oil Pipeline (SEAOP)	CNPC-SEAP Co., Ltd	China	51%	N/C	N/C
		MOGE	Myanmar	49%	N/C	N/C
3	Anadaman Transportation Limited(Yangon Branch)(ATL)	N/C	N/C	20%	N/C	N/C
		PTTEP Offshore Limited	N/C	80%	N/C	N/C
4	Moattama Gas Transportation Co.,Ltd(MGTC)	Myanma Oil & Gas Enterprise		15%	N/C	N/C
		Total E&P Myanmar	French	31%	Yes	Paris
		Unocal Global Venture Co., Ltd	American	28%	Yes	America
		PTTEPI Co., Ltd	Thailand	26%	Yes	Thailand
5	Tanitharyi Pipeline Company LLC(Myanmar Branch)(TPC)	PC Myanmar (Hong Kong) Limited	Malaysia	11%	No	N/C
		Myanma Oil & Gas Enterprise	Myanmar	20%	No	N/C
		Nippon Oil and Gas Enterprise	Japan	19%	No	N/C
		PTTEP International Limited	Thailand	19%	No	N/C
		PETRONAS Carigali Myanmar III Inc	Malaysia	30%	No	N/C

## Pearl

No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity (yes/no)	Name of the Stock exchange
1	Myanmar Tasaki Co., Ltd	TASAKI & Co., Ltd.	Japan	100%	No	N/C
2	Myanmar Atlantic Co., Ltd	Mr.Giuseppe Rotondella	Australian	52%	N/C	N/C
		U Kyi Soe	Myanmar	38%	N/C	N/C
		U Min Kun Htaw	Myanmar	10%	N/C	N/C
3	Myanmar Andman Co., Ltd	N/C	N/C	N/C	N/C	N/C
4	Belpearl Myanmar Co., Ltd	Belpearl (S) Pte Ltd		96%	N/C	N/C
		Mrs.Marie Rose Hajjar	Canada	3%	N/C	N/C
		Mr.Pierre Hajjar	Canada	1%	N/C	N/C
5	Nino Pearl Culturing Co., Ltd	U Ye Htun	Myanmar	50%	N/C	N/C
		Daw Myo Pa Pa Win	Myanmar	50%	N/C	N/C
6	Orient Pearl Co., Ltd (Zinyaw)	N/C	N/C	N/C	N/C	N/C
7	Orient Pearl Co., Ltd (Jalan)	N/C	N/C	N/C	N/C	N/C
8	Annawar Pearl Co., Ltd (Marine Pearl Company)	Daw Aye Aye Mon	Myanmar	100%	N/C	N/C
9	Pyae Sone Htet Myint Co., Ltd	U Kyaw Lwin	Myanmar	65%	N/C	N/C
		U Myo Win Than	Myanmar	15%	N/C	N/C
		U Htay Win	Myanmar	15%	N/C	N/C
		Daw May Thandar Myint	Myanmar	5%	N/C	N/C
10	Aquagold Myanmar Co., Ltd	N/C	N/C	N/C	N/C	N/C
11	Pyae Phyto Tun Co., Ltd	Dr Aung Lwin @ Ah Khwe	Myanmar	33%	N/C	N/C
		U Hla Than	Myanmar	30%	N/C	N/C
		Daw Thet Sanda	Myanmar	10%	N/C	N/C
		Daw Khin Than Yi	Myanmar	10%	N/C	N/C
		Daw Tin War	Myanmar	8%	N/C	N/C
		Daw Myint Myint Kyu	Myanmar	8%	N/C	N/C
		U Myat Ko Ko	Myanmar	0%	N/C	N/C
		Daw Myat Thiri Khaing	Myanmar	0%	N/C	N/C
		Daw Hsu Thiri Nwe	Myanmar	0%	N/C	N/C



## Gems and Jade

No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity	Name of the Stock exchange
1	Linn Lett Win Yadanar Gems Co Ltd	U Tun Kyi	Nc	50%	Nc	Nc
		D Kyi Kyi Aye @ D Ah Chin	Nc	50%	Nc	Nc
2	Yar Za Htar Ni	Nc	Nc	Nc	Nc	Nc
3	YADANAR TAUNG TEN	U Thet Naing	Myanmar	20%	Nc	Nc
		U Than Myint	Myanmar	16%	Nc	Nc
		U Sai Shwe Myint Than	Myanmar	14%	Nc	Nc
		U Sai Lu Htwe	Myanmar	14%	Nc	Nc
		U Maung Kyay	Myanmar	12%	Nc	Nc
		U Chit Han	Myanmar	13%	Nc	Nc
		U KhinAung	Myanmar	10%	Nc	Nc
4	Wai Aung Gabar	Daw Htet Hteet Wai	Myanmar	23%	No	N/A
		U Sai Shung Twee	Myanmar	23%	No	N/A
		Daw Yu Yu San	Myanmar	21%	No	N/A
		Daw Nway Nway Hlaing	Myanmar	17%	No	N/A
		Daw Le Le Wai	Myanmar	17%	No	N/A
		U Thant zin	Myanmar	0%	No	N/A
5	Ayeyar Yadanar Gems & Jewellery Co .,Ltd	Nc	Nc	Nc	Nc	Nc
6	A K N K					
7	SILVER ELEPHANT GEMS CO LTD	U Soe Myint	Myanmar	20%	Nc	Nc
		Daw Nan Than Kyi	Myanmar	20%	Nc	Nc
		U Myo Min Soe	Myanmar	20%	Nc	Nc
		Daw Ei Myo Myo Khine	Myanmar	20%	Nc	Nc
		U Soe Thein Aung	Myanmar	20%	Nc	Nc
8	Phyo Thiha Kyaw	Nc	Nc	Nc	Nc	Nc
9	Same Wai Hlaing (SWH)	U CHIT OO LWIN @ CHIT LWIN OO	MYANMAR	2%	Nc	Nc
		U SI THU	MYANMAR	2%	Nc	Nc
		U MAUNG MAUNG LAY	MYANMAR	0%	Nc	Nc
		DAW THANDAR OO	MYANMAR	2%	Nc	Nc

No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity	Name of the Stock exchange
		U WANG SHAN LYAN @ U KHIN MG SOE	MYANMAR	93%	Nc	Nc
		DAW MOE MOE WIN	MYANMAR	2%	Nc	Nc
10	Mya Garden (GEG)	U Tin Maung	Myanmar	50%	No	N/A
		Daw Shwe Cynn	Myanmar	50%	No	N/A
11	Kan Pwint Oo	SHOUK SHAN	MYANMAR	50%	No	N/A
		MYA SEIN	MYANMAR	9%	No	N/A
		SHOUK HOUN	MYANMAR	40%	No	N/A
		HMWE KHAYA @ HIAO SHU	MYANMAR	1%	No	N/A
12	Shwe Ngar Koe Kaung	Nc	Nc	Nc	Nc	Nc
13	Shwe Gaung Gaung Gems Co Ltd	U Chit Lwin	Myanmar	54%	Nc	Nc
		U Than Htay @ U Maung Maung	Myanmar	24%	Nc	Nc
		Daw Hmaw Hmaw	Myanmar	13%	Nc	Nc
		U Aung Thwin Lay	Myanmar	7%	Nc	Nc
		U Myint Aung	Myanmar	1%	Nc	Nc
		U Shey Reh	Myanmar	1%	Nc	Nc
14	Htun Tauk Zabu Gems & Jewellery Co;Ltd.	Nc	Nc	Nc	Nc	Nc
15	Sein Lonm Taung Tan (SLTT-S)	U YAN CHIN SEIN	MYANMAR	39%	Nc	Nc
		DAW ZU HWAM	MYANMAR	31%	Nc	Nc
		U LAN PIYN SITE	MYANMAR	11%	Nc	Nc
		U THEIN AUNG	MYANMAR	7%	Nc	Nc
		DAW THAN THAN SWE	MYANMAR	12%	Nc	Nc
16	Ayar Jade	U La Phai Hkun Sa	Myanmar	50%	No	N/A
		U Than Oo	Myanmar	45%	No	N/A
		U Shouk Houn	Myanmar	5%	No	N/A
17	Shining Star Light Gems & Jewellery Co.,Ltd	Nc	Nc	Nc	Nc	Nc
18	Yadanar Sin Thiri Gems Co	U Saw Linn	Citizen	92%	No	N/A
		Daw Kyi Kyi Aye	Citizen	4%	No	N/A
		U Nyan Kyi Htet	Citizen	4%	No	N/A
19	SHWE OAK KHAI MINING CO.,LTD.	U Tun Tun Oo	Myanmar	39%	Nc	Nc

No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity	Name of the Stock exchange
		U Arr Sam	Myanmar	10%	Nc	Nc
		U Kyaw Oo	Myanmar	20%	Nc	Nc
		U Sai Lone Tint	Myanmar	10%	Nc	Nc
		U Sai Myo Thant	Myanmar	10%	Nc	Nc
		U Kyaw Sein	Myanmar	10%	Nc	Nc
20	Jade Mountain	Nc	Nc	Nc	Nc	Nc
21	Thirawmani	U HTUN THEIN@ U TUN TUN	MYANMAR	56%	No	N/A
		DAW WAI WAI	MYANMAR	19%	No	N/A
		U ZAW TUN NAING	MYANMAR	6%	No	N/A
		U ZAW TUN WAI	MYANMAR	6%	No	N/A
		U ZAW TUN AUNG	MYANMAR	6%	No	N/A
		DAW THAZIN HTUN	MYANMAR	6%	No	N/A
22	Phoe Thar Htoo Gems Co.,Ltd.	U Than Aye	Nc	51%	Nc	Nc
		D Myint Myint Shwe	Nc	49%	Nc	Nc
23	Myanma Seinn Lei Aung Gems Co Ltd.	U Si Thu Myat	Myanmar 7/TaNgaNa (Naing) 087375	8%	Nc	Nc
		U Hla Win	Myanmar 13/TaKaNa (Naing) 130429	29%	Nc	Nc
		Daw Aye Thandar Khaing	Myanmar 7/TaNgaNa (Naing) 000012	20%	Nc	Nc
		Daw Li Kwi Shan	Myanmar 13/KaKhaNa (Naing) 024403	25%	Nc	Nc
		Daw Thida Aye	Myanmar 13/KhaMaSa (Naing) 021352	13%	Nc	Nc
		Daw Myint Kyi	Myanmar 9/MaKaNa (Naing) 095601	5%	Nc	Nc
24	Yadanar Yaung Chi	1.Daw Chein Yu Yin	Myanmar	20%	Nc	Nc
		2.Daw Nan Lee	Myanmar	25%	Nc	Nc
		3.Daw Yan Shinn May	Myanmar	15%	Nc	Nc
		4.U Hla Maung@Yan Kyar Lint	Myanmar	10%	Nc	Nc
		5.U Kyaw Wai	Myanmar	30%	Nc	Nc
25	Linn Htet Aung Gems Co.,Ltd.	U TUN KYAING	Nc	10%	Nc	Nc
		U PYI PHYO AUNG	Nc	90%	Nc	Nc
26	Norbal Three Star (GMMK)	Daw Khin Nw e Soe	2/LaKaNa(N)005851	20%	Nc	Nc

No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity	Name of the Stock exchange
		Daw Phyo Thandar Htay	7/TanGaNa (N) 097700	10%	Nc	Nc
		U Saw Naing Oo	3/BaaHna(N)128118	50%	Nc	Nc
		U Aik Maung	1/MaKaNa(N)018063	10%	Nc	Nc
		U Thet Naing Oo	12/DaGaNa(N)033357	10%	Nc	Nc
27	WAN BROTHERS	Aye Shwe yi Lwin	Myanmar	0%	Nc	Nc
		Chit Swe @ Wang Shan Sein	Myanmar	52%	Nc	Nc
		War War Chit	Myanmar	48%	Nc	Nc
28	Mya Young Tun	DAW NAN AYE CHIT	Myanmar	250%	No	N/A
		U SAN MYINT OO	Myanmar	250%	No	N/A
29	Nan Htike Pyae Paing Co	Nc	Nc	Nc	Nc	Nc
30	Khun Paoee	Nc	Nc	Nc	Nc	Nc
31	Great wall Gems&Jade company	Nc	Nc	Nc	Nc	Nc
32	Great Genesis Gems (GMH)	Daw Nang Saw Htwe	1/Ma Ka Ta (N) 049490	100%	Nc	Nc
		Daw Naw Muse Wah	7/Ka Ta Kha (N) 140551	0%	Nc	Nc
		Daw Toe Myint San	7/Pha Ma Na (N) 133005	0%	Nc	Nc
33	Htat Aye Yar	U Maung Chain	Myanmar	10%	Nc	Nc
		U Maung Tun	Myanmar	10%	Nc	Nc
		U Win Naing	Myanmar	80%	Nc	Nc
34	Wai Family	U Sai Shang @ U Tar Wai	Myanmar	60%	No	N/A
		Daw Khin Saw Hlaing	Myanmar	10%	No	N/A
		U Sai Shung Twee	Myanmar	10%	No	N/A
		Daw Nway Nway Hlaing	Myanmar	10%	No	N/A
		Daw Yu Yu San	Myanmar	10%	No	N/A
35	Seng Tawng Gems&Jewellery Co., Ltd	U GON DAN DU	MYANMAR	5%	No	N/A
		DAW NAN ZI @ INN NAN	MYANMAR	7%	No	N/A
		U ZAW BAWN	MYANMAR	87%	No	N/A
36	Kyauk Same Nan Taw (GKN)	U Khin Maung Myint	Myanmar	50%	Nc	Nc
		Daw Thin Thin Khaing	Myanmar	50%	Nc	Nc
37	Jade Land	Nc	Nc	Nc	Nc	Nc

No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity	Name of the Stock exchange
38	Jade Than Lwin	U Thet Tun	Myanmar	80%	Nc	Nc
		U Aung Aung Tun	Myanmar	20%	Nc	Nc
39	1 1 1	SHOUK HOUN	MYANMAR	11%	No	N/A
		KHAING KHAING OO	MYANMAR	4%	No	N/A
		MIN LWIN	MYANMAR	11%	No	N/A
		TIN TIN SHWE @ SOON KYEIN YIN	MYANMAR	32%	No	N/A
		KHIN WIN KYI	MYANMAR	11%	No	N/A
		HMWE KHAYA @ HIAO SHU	MYANMAR	1%	No	N/A
		MYA SEIN	MYANMAR	28%	No	N/A
		WIN WIN KHING @ SHORT CHANG	MYANMAR	4%	No	N/A
40	Kaung Myat Thu Ka	D KYI KYI HTWE	Nc	98%	Nc	Nc
		D SAN SAN WIN	Nc	2%	Nc	Nc
41	Seine Pwint Pwint Wai	U Sai Soe Win	Myanmar	50%	Nc	Nc
		Daw Nan Aye Khine	Myanmar	50%	Nc	Nc
42	Khine Myanmar	U AUNG KYAW MYINT	Citizen	67%	No	N/A
		U SAW LINN	Citizen	30%	No	N/A
		DAW SAN SAN TOE	Citizen	3%	No	N/A
43	Unity	U Tin Tun @ Kyan Ein Htee	Myanmar	200%	No	N/A
		Daw Nan Aye Htwen	Myanmar	300%	No	N/A
44	Wai Yan Thar (WYT)	DAW LAW KAY	Myanmar	250%	No	N/A
		U MOE CHAIN	Myanmar	250%	No	N/A
45	Sin Gaung Taung	U Kyaw Lwin	Myanmar	42%	Nc	Nc
		Daw Yin Yin Oo	Myanmar	23%	Nc	Nc
		U Kyaw Win	Myanmar	17%	Nc	Nc
		U Aung Zaw Hein	Myanmar	10%	Nc	Nc
		U Than Win Tun	Myanmar	9%	Nc	Nc
46	GREEN MOUNTAIN CO;LTD	U KYAW THU	Citizen	90%	No	N/A
		U NYAN KYI HTET	Citizen	10%	No	N/A
47	Chang Long Gems & Jewellery Co Ltd		Nc	Nc	Nc	Nc

No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity	Name of the Stock exchange
48	Kyaut Myat Min	U Tun Kyaw Win	Myanmar	2%	Nc	Nc
		U San Hlaing	Myanmar	98%	Nc	Nc
		Daw San San Win	Myanmar	0%	Nc	Nc
		U Win Naing	Myanmar	0%	Nc	Nc
49	Yadanar Shwe Ye Win	D KHIN KHIN HTWE	Nc	99%	Nc	Nc
		D KHIN SHWE YI MON	Nc	1%	Nc	Nc
50	Myit Sone Ayar	U Thein Latt	Nc	8%	Nc	Nc
		U Sai Zin Nyunt	Nc	8%	Nc	Nc
		D Wai Wai Htwe	Nc	83%	Nc	Nc
51	Yadanar Aung Chan	Nc	Nc	Nc	Nc	Nc
52	Myanmar Imperial Jade Co	MYANMA ECONOMIC HOLDING PUBLIC Co.,Ltd	MYANMAR	100%	Yes	Nc
53	Khin Zaw Aung & Brother	1.U Tin Win	Myanmar	1%	Nc	Nc
		2.U Khin Zaw Aung	Myanmar	1%	Nc	Nc
		3.Daw Chein Yu Yin	Myanmar	48%	Nc	Nc
		4.Daw Nan Lee	Myanmar	25%	Nc	Nc
		5.Daw Yan Shinn May	Myanmar	15%	Nc	Nc
		6.Daw Hla Hla Khaing	Myanmar	5%	Nc	Nc
		7.Fu Chan@U San Maung	Myanmar	5%	Nc	Nc
54	Myanmar First Gems & Jewellery Co Ltd	Nc	Nc	Nc	Nc	Nc
55	Ever Winner [EW]	U AIKE HTWE	Nc	55%	Nc	Nc
		D KYAUK CHI PHONE	Nc	45%	Nc	Nc
56	Shwe Hein Htet Gems Co Ltd	U Win Naing	Myanmar	55%	Nc	Nc
		Daw Wai Wai Mon	Myanmar	44%	Nc	Nc
		U Win Aung	Myanmar	0%	Nc	Nc
		U Kyaw Naing	Myanmar	0%	Nc	Nc
		Daw San Yu Mar	Myanmar	0%	Nc	Nc
		U Min Thein Kha	Myanmar	0%	Nc	Nc
57	Myo Nwe Gems	U Khin Maung Myint	Myanmar	57%	No	N/A
		Daw Lily Myint	Myanmar	43%	No	N/A

No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity	Name of the Stock exchange
58	Tun Naing Aung	Yan Swe Sai	Nc	83%	Nc	Nc
		Fan Shauk Kyaung @ Hla Myint @ Than Lwin	Nc	17%	Nc	Nc
59	Nay Min Kabar Co	U Zaw Myint Htoo	Myanmar	100%	No	N/A
		U Than Oo	Myanmar	0%	No	N/A
		U Ye Yan Aung	Myanmar	0%	No	N/A
60	Zebu Thiri Gems Co.,ltd	Daw Phyu Phyu Win	Myanmar	50%	Nc	Nc
		U San Tin	Myanmar	50%	Nc	Nc
61	Yadanar Three Elephants Co	U HLA HTOO	Citizen	80%	No	N/A
		DAW LIN LET WIN KYI	Citizen	20%	No	N/A
62	Kyaing International (GKI)	Kyaing San Shwe	Myanmar	80%	Nc	Nc
		U Win Tin	Myanmar	20%	Nc	Nc
63	Nan Oo Yadanar	U SAN ZAW OO	Nc	1%	Nc	Nc
		U NAY LIN AUNG	Nc	0%	Nc	Nc
		D EI EI HTWE	Nc	99%	Nc	Nc
64	Su Htu Pan (Su Htoo Pan)	U Kyaw Htay	Myanmar	52%	Nc	Nc
		Daw Khaing Thet Mon	Myanmar	48%	Nc	Nc
65	Long Byit	U Zakhon Taing Yein	MYANMAR	40%	Nc	Nc
		U Zakhon Wai Taung@zaw tun	MYANMAR	10%	Nc	Nc
		U Maung Naing@zaw win	MYANMAR	10%	Nc	Nc
		U Nyi Lay@ Thar Aung	MYANMAR	20%	Nc	Nc
		U Khin Zaw Oo@Khin Zaw	MYANMAR	10%	Nc	Nc
		U Zakon Yein Chang	MYANMAR	10%	Nc	Nc
66	Super Sein	Nc	Nc	Nc	Nc	Nc
67	Win Lei Yadanar	Daw Lee Kwai Shan	Myanmar	2174%	Nc	Nc
		U Chein Soak	Myanmar	10%	Nc	Nc
		U Lway Khine Wan	Myanmar	906%	Nc	Nc
		U Myint Zaw Hein	Myanmar	10%	Nc	Nc
68	Kyal Sin Phyu	AUNG AUNG	MYANMAR	30%	No	N/A
		PHONE THANDAR	MYANMAR	30%	No	N/A

No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity	Name of the Stock exchange
		WAING WAING MYINT	MYANMAR	40%	No	N/A
69	Treasure Star Co., Ltd.	Nc	Nc	Nc	Nc	Nc
		Daw San San Toe	Citizen	48%	No	N/A
70	ARS Gems [ARS]	U Saw Linn	Citizen	28%	No	N/A
		Daw Kyi Kyi Aye	Citizen	24%	No	N/A
71	Yadanar Pyi Phyto Aung Gems Co., Ltd	D WAI WAI HTWE	Nc	97%	Nc	Nc
		D ARZET	Nc	3%	Nc	Nc
72	Jade Padatar Gems Co,Ltd	U Tun Kyaw	Myanmar	2%	Nc	Nc
		U San Hlaing	Myanmar	98%	Nc	Nc
		Nay Win Swe(a)Nay Win Tun	Myanmar	88%	No	N/A
73	Ruby Dragon Company	Ye Myat Thu	Myanmar	7%	No	N/A
		Aye Aye Myint	Myanmar	1%	No	N/A
		Myint Myat Thu	Myanmar	2%	No	N/A
		Min Myat Thu	Myanmar	2%	No	N/A
		U Labya Tu	Myanmar	4%	Nc	Nc
74	Northern Jade World	U Labya Aung Mai	Myanmar	1%	Nc	Nc
		U Phyto Wai aung	Myanmar	1%	Nc	Nc
		U Law Ay	Myanmar	2%	Nc	Nc
		U Ma Naw	Myanmar	1%	Nc	Nc
		U Jar Naw	Myanmar	2%	Nc	Nc
75	Kaung Htet Khaing	Daw Wai Wai Mon	Myanmar	48%	Nc	Nc
		U Min Thein Kha	Myanmar	48%	Nc	Nc
		Daw San Yu Mar	Myanmar	2%	Nc	Nc
		Daw Aye Hnin Phyu	Myanmar	2%	Nc	Nc
		Daw Yee Yee Lay	Citizen	29%	No	N/A
76	Kaung Swan Htet Co	U AUNG THEIN	Citizen	42%	No	N/A
		U NYAN KYI HTET	Citizen	14%	No	N/A
		DAW KYU KYU AYE	Citizen	14%	No	N/A
		DAW HMWAY KHAYAY @ SHAW SUE	Citizen	1%	No	N/A



No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity	Name of the Stock exchange
77	Shwe Ywat Hlwar	U Moe Kyaw	Nc	50%	Nc	Nc
		D Moh Moh Win	Nc	50%	Nc	Nc
78	Same Lei Yadanar Win Co (SLYW)	Nc	Nc	Nc	Nc	Nc
79	Hpakan King Gems & Jewellery Co. Ltd	U ZAW MIN TUN	Myanmar	250%	No	N/A
		DAW SHWE LI	Myanmar	250%	No	N/A
80	Agga Yadanar Jade Gems & Jewellery Co., LTD	U Thant Zin	MYANMAR	50%	Nc	Nc
		Daw Li Shwin Shan	MYANMAR	50%	Nc	Nc
81	Shwe War Myae (mandalay)	U Tin Tun @ Kyan Ein Htee	Myanmar	200%	No	N/A
		Daw Nan Aye Htwen	Myanmar	300%	No	N/A
82	Delta Land	Khin Nyein Nyein Thu	MYANMAR	8%	Nc	Nc
		NAN Ngwe Kyu	MYANMAR	38%	Nc	Nc
		Shauk Kaung@U Aung Myat	Nc	38%	Nc	Nc
		Nyein Nyein San	Nc	8%	Nc	Nc
		Than Htike Oo	Nc	8%	Nc	Nc
83	Seine Lone Aung	DAW YEE CHUN	Myanmar	250%	No	N/A
		U SOE LI	Myanmar	250%	No	N/A
84	Aung Hein Minn	U Chit San	Myanmar	40%	No	N/A
		Daw Leo Shwn @ Yin Yin Lei	Myanmar	27%	No	N/A
		U Than Nain gWin	Myanmar	17%	No	N/A
		U Zaw Naing Oo	Myanmar	17%	No	N/A
85	Kyauk Seinn Sun Shwin Jade Gems & Jewellery Co Ltd	Nc	Nc	Nc	Nc	Nc
86	Yadanar Aung Tun Tauk	U Shauk Feng	Nc	48%	Nc	Nc
		D Cho Cho Lay	Nc	52%	Nc	Nc
87	U YA GEMS	1. U Jan Pin Chang	Myanmar	27%	Nc	Nc
		2. Daw Than Kyi	Myanmar	23%	Nc	Nc
		3. U Kyaw Sein	Myanmar	4%	Nc	Nc
		4. U Tin Win	Myanmar	2%	Nc	Nc
		5. U San Wai Chin	Myanmar	15%	Nc	Nc
		6. U Kyaw Wai @ San Wai Hwar	Myanmar	27%	Nc	Nc

No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity	Name of the Stock exchange
		7. U Win Naing Oo	Myanmar	2%	Nc	Nc
88	Chaow Brothers Gemstone Enterprise Ltd	U Chaow Yin Htone	Myanmar	67%	No	N/A
		U Than Naing Win	Myanmar	30%	No	N/A
		U Zaw Lin Tun@ Zin Lin Tun	Myanmar	3%	No	N/A
89	Myat Yamon	Daw Soe Soe Thet (@) Su Phine	Myanmar	25%	No	N/A
		U Khin Maung Myint	Myanmar	30%	No	N/A
		U Kyaw Oo	Myanmar	20%	No	N/A
		U Tin Myint	Myanmar	25%	No	N/A
90	Nay La Pwint	U Aik Pang (Managing Director)	Wa/ Myanmar	31%	Nc	Nc
		U Sai Noom Lone (Director)	Shan/Myanmar	11%	Nc	Nc
		Daw Myint Myint Win @ Yan Min Waw (Director)	Koe Kant/Myanmar	11%	Nc	Nc
		U Yin Lin Phoo (Director)	Koe Kant/Myanmar	11%	Nc	Nc
		U Aik Kwin (Director)	Wa/ Myanmar	11%	Nc	Nc
		U Sat Ko @ U Ba Shwe (Director)	Shan/Myanmar	11%	Nc	Nc
		U Aik Pee (Director)	Koe Kant/Myanmar	12%	Nc	Nc
		Daw Shauk Ho (Director)	Koe Kant/Myanmar	3%	Nc	Nc
91	Ma Li Kha Gem Stone Co	Daw Lwin Lwin Kyaw	Myanmar	12%	Nc	Nc
		Daw Nan Sai	Myanmar	11%	Nc	Nc
		U Paing San Raydam	Myanmar	29%	Nc	Nc
		U Ray Dam Tang	Myanmar	36%	Nc	Nc
		U Saw Lwin	Myanmar	12%	Nc	Nc
92	Wan Full	U Kaung Htee Yin @ U Sein	Myanmar	66%	Nc	Nc
		U Kyaw Kyaw	Myanmar	17%	Nc	Nc
		Daw Li Shwin Paung	Myanmar	17%	Nc	Nc
93	Aung Tu Ka Dana	U Maung Kyaw	Myanmar	42%	Nc	Nc
		Daw Khin San Yee	Myanmar	32%	Nc	Nc
		U Maung Nge	Myanmar	26%	Nc	Nc
94	Yadanar Moe Myay	U Hla Myint	Nc	50%	Nc	Nc
		D Myo Zin Mar Tun	Nc	50%	Nc	Nc

No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity	Name of the Stock exchange
95	Shein Family gems Co., Ltd.	D THIDA	Nc	51%	Nc	Nc
		D KYI SAN	Nc	49%	Nc	Nc
96	Thein Gabar Aung	Daw Than Than Htwe	Citizen	24%	No	N/A
		Daw Yin Mon Mon Kyaw	Citizen	26%	No	N/A
		Daw Kyu Kyu Aye	Citizen	50%	No	N/A
97	Jade Treasure	Daw Kyu Kyu Aye	Citizen	94%	No	N/A
		U Ko Ko Oo	Citizen	6%	No	N/A
98	Lawka Nandar	Nc	Nc	Nc	Nc	Nc
99	Ngwe Si Hein	U San Tauk	Myanmar	Nc	Nc	Nc
		U Mg Mg Tar	Myanmar	Nc	Nc	Nc
		Daw Yang Chin May	Myanmar	Nc	Nc	Nc
		Daw Nan Chaw Hla	Myanmar	Nc	Nc	Nc
100	Myat Pan Khaing	Nc	Nc	Nc	Nc	Nc
101	Lon Hai	Ann Hai	Myanmar	60%	No	N/A
		Aye Thi	Myanmar	40%	No	N/A
102	Goldend Light gems	U San Tin	Myanmar	100%	Nc	Nc
		U Tun Kyaw Win	Myanmar	0%	Nc	Nc
103	Hein Aung Lin Htet Jade Co. Ltd	Daw Aye Aye	Myanmar	40%	Nc	Nc
		U San Hlaing	Myanmar	60%	Nc	Nc
104	Phar Kant Sai Bon					
105	Thigi Myintzu Yadanar	LEE KYAIN CHIN @ U AUNG KYAW SOE	Citizen	93%	No	N/A
		U CHIT MIN THU	Citizen	7%	No	N/A
106	Seinn Nay Chi Gems & jade company	Nc	Nc	Nc	Nc	Nc
107	Seine Light	U Nay Win Maung	Myanmar	60%	Nc	Nc
		U Htet Win	Myanmar	30%	Nc	Nc
		U Phone Naing	Myanmar	5%	Nc	Nc
		U Yan Myo Aung	Myanmar	5%	Nc	Nc
108	New Lucky Green Gems	New Lucky Green Gems	Myanmar	100%	Nc	Nc
109	Mya San Dar (MSD)	Mya Sandar Jade & Jewellery		100%	No	N/A

No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity	Name of the Stock exchange
110	Jade Thazin	U Maung Pyone	Myanmar	2%	Nc	Nc
		U San Haing	Myanmar	98%	Nc	Nc
111	Kaung Su Aung	Kaung Su Aung Jade		100%	No	N/A
112	Kachin National Development	U DA BAN NODELE	Myanmar	11%	No	N/A
		U GUM DAN DU	Myanmar	6%	No	N/A
		U HLA TUN @ U HLA TAUNG	Myanmar	8%	No	N/A
		U KWE PINN @ U SHWE MYINT	Myanmar	18%	No	N/A
		U LA BANG GU RA	Myanmar	22%	No	N/A
		U LAPHAI ZAW YUN	Myanmar	13%	No	N/A
		U MA TU NAW	Myanmar	13%	No	N/A
		U TU JA	Myanmar	8%	No	N/A
		U TUN MIN	Myanmar	0%	No	N/A
113	Jade Thapyae Co.,ltd	U Phan Lin	Myanmar	2%	Nc	Nc
		U San Hlaing	Myanmar	98%	Nc	Nc
114	Kaung Wai Yan Co	Daw Lee Kwai Shan	Myanmar	23%	Nc	Nc
		Daw Myint Kyi	Myanmar	47%	Nc	Nc
		U Chein Soak	Myanmar	10%	Nc	Nc
		U Lway Khine Wan	Myanmar	12%	Nc	Nc
		U Myint Zaw Hein	Myanmar	10%	Nc	Nc
115	Green Diamond Gems & Jewellery Co. Ltd	U Sai Shung Twee	Myanmar	30%	No	N/A
		U Sai Lay Thu	Myanmar	30%	No	N/A
		Daw Nway Nway Hlaing	Myanmar	20%	No	N/A
		Daw Yu Yu San	Myanmar	20%	No	N/A
116	Lucky Star Jade Group	Nc	Nc	Nc	Nc	Nc
117	Yadanar Si	Nc	Nc	Nc	Nc	Nc
118	All Right Company	Aung Kyaw Oo	Myanmar	2%	Nc	Nc
		Li Kyin Phyin	Myanmar	98%	Nc	Nc
119	Jewel Crown Company	Daw Yin Yin Aye)	Citizen	92%	No	N/A
		U Saw Lin	Citizen	8%	No	N/A

No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity	Name of the Stock exchange
120	Kaung Mon Yadanar	U Kyaw Htay	Myanmar	54%	Nc	Nc
		Daw Khaing Thet Mon	Myanmar	46%	Nc	Nc
121	Green Earth Gems Co., Ltd	U HU YU PAN	MYANMAR	20%	No	N/A
		U LIN YU @ WAN SHAN YIN	MYANMAR	20%	No	N/A
		U MAUNG MAUNG AUNG	MYANMAR	20%	No	N/A
		U TIN SEIN	MYANMAR	40%	No	N/A
		U Sai Shung Twee	Myanmar	40%	No	N/A
122	Global Sun Light	U Sai Lay Thu	Myanmar	10%	No	N/A
		U Kyaw Win Aung	Myanmar	10%	No	N/A
		Daw Htet Htet Wai	Myanmar	10%	No	N/A
		Daw Le Le Wai	Myanmar	10%	No	N/A
		Daw May Thu Win	Myanmar	10%	No	N/A
		U Thant Zin	Myanmar	5%	No	N/A
		U Win Sein	Myanmar	5%	No	N/A
		U Myo Min Aung	Myanmar	20%	Nc	Nc
123	Aung Hlaing Kyawlwa	U Than Naing	Myanmar	48%	Nc	Nc
		U San Hlaing	Myanmar	32%	Nc	Nc
		U Myo Min Aung	Myanmar	20%	Nc	Nc
124	Value Standard	Nc	Nc	Nc	Nc	Nc
125	Seine Aung	U Aung Win	Myanmar	10%	Nc	Nc
		U Yan Kyae Fa	Myanmar	10%	Nc	Nc
		Daw Nan Htay	Myanmar	10%	Nc	Nc
		U Kha Khoo	Myanmar	35%	Nc	Nc
		U Than Myint @ U Khun Daung	Myanmar	35%	Nc	Nc
126	Myint Shin Gems Co.,LTd	U AIK LUN	Myanmar	300%	Nc	Nc
		DAW ANN MAY	Myanmar	200%	Nc	Nc
127	U Kyaw Thet	U Kyaw Thet	Myanmar	100%	Nc	Nc
128	Buu Gar	Kareng La Tawng	Myanmar	25%	Nc	Nc
		Seng Tawng	Myanmar	25%	Nc	Nc
		Naw Sam	Myanmar	25%	Nc	Nc

No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity	Name of the Stock exchange
129	Jade Pioneer Mining Limited	La Tat	Myanmar	25%	Nc	Nc
		AH SHONE	Nationality	88%	No	N/A
		MYA KHINE	Nationality	8%	No	N/A
		CHIN ANG	Nationality	2%	No	N/A
		LIN NEW OO	Nationality	2%	No	N/A
130	Kyauk Seinn Minn Gems	U Tun Win	Myanmar	80%	Nc	Nc
		U Win Htaik	Myanmar	10%	Nc	Nc
		Daw Yein Fee	Myanmar	10%	Nc	Nc
131	Yi Li Fa [YLF]	U Ah Woo	Myanmar	20%	Nc	Nc
		U Maung Ko	Myanmar	20%	Nc	Nc
		U Aik Shan	Myanmar	28%	Nc	Nc
		Daw Shwe Oh	Myanmar	20%	Nc	Nc
		U Win Aung	Myanmar	12%	Nc	Nc
132	Pyi Yadanar	U Aung Phyo	MYANMAR	0%	Nc	Nc
		U Ko Ko Naing	MYANMAR	0%	Nc	Nc
		U Myo Aung	MYANMAR	1%	Nc	Nc
		U Myo Thant	MYANMAR	50%	Nc	Nc
		U Zaw Htay Lwin	MYANMAR	0%	Nc	Nc
		U Zaw Lin	MYANMAR	49%	Nc	Nc
133	MELODIOUS GEMS COMPANY LIMITED	Daw Than Than (Managing Director)	Myanmar	34%	Nc	Nc
		Daw Win Win(Director)	Myanmar	32%	Nc	Nc
		U Hla Soe Oo(Director)	Myanmar	34%	Nc	Nc
		U Ko Ko Aung(Director)	Myanmar	0%	Nc	Nc
		U Nyunt Htay(Director)	Myanmar	0%	Nc	Nc
134	Myanmar Thura [MTY]	U Kyaw Thura (Managing Director)	Myanmar	37%	N/A	N/A
		U Hla Soe Oo (Director)	Myanmar	30%	N/A	N/A
		Daw Than Than (Director)	Myanmar	30%	N/A	N/A
		U Thein Tun (Director)	Myanmar	2%	N/A	N/A
		U Myo Min Tun (Director)	Myanmar	2%	N/A	N/A

No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity	Name of the Stock exchange
135	Kyaut Seinnn Karbarkyaw	U Mg Mg Hla Kyaw (Director)	Myanmar	0%	N/A	N/A
		U Zakhon Taint Yein	Myanmar	20%	N/A	N/A
		U Nyi Lay (A) Thar Aung	Myanmar	20%	N/A	N/A
		Myo Kyin	Myanmar	20%	N/A	N/A
		Zaw Sai	Myanmar	20%	N/A	N/A
		Khin Zaw Oo (A) Khin Zaw	Myanmar	20%	N/A	N/A
136	Hole In One	U Kauk Kyone Nin	1/WaMaNa(Phu)000007	35%	Nc	Nc
		U Law Sone	9/MaYaTa(Phu)000001	20%	Nc	Nc
		U Yang Shan Yung	1/WaMaNa(Phu)000008	20%	Nc	Nc
		U Chin Sein	9/MaYaTa(N)106511	10%	Nc	Nc
		U Aik Pin	13/TaYaNa(N)022066	15%	Nc	Nc
137	Nay Chi Yadanar Co., Ltd.	U YAN AUNG	Nc	50%	Nc	Nc
		U MYO AUNG	Nc	50%	Nc	Nc
138	Kyauk Seinn Wingabar Jade Gems & Jewellery Co.,Ltd	Nc	Nc	Nc	Nc	Nc
139	Ou Ryu Sein Yadanar	U Kyaw Aung	Myanmar	92%	N/A	N/A
		Daw Min Min Than	Myanmar	0%	N/A	N/A
		Daw Myint Myint Aye	Myanmar	8%	N/A	N/A
140	Kaung Htike	U Maung Kyaw	Myanmar	11%	Nc	Nc
		Daw Khin San Yee	Myanmar	89%	Nc	Nc
141	Sein Minn Yadanar	U Kyaw Aung	Myanmar	20%	N/A	N/A
		U Kyaw Win Lwin	Myanmar	40%	N/A	N/A
		U Kyaw Sein	Myanmar	40%	N/A	N/A
142	Treasure Five Star Co., Ltd	U MALANG GAM	MYANMAR	14%	No	N/A
		DAW JI SENG NAN	MYANMAR	14%	No	N/A
		U ZAW SHAM LUM	MYANMAR	28%	No	N/A
		U LAHTAW YAW	MYANMAR	16%	No	N/A
		U GAM DAN ZAU	MYANMAR	14%	No	N/A
		DAW ROI SENG	MYANMAR	14%	No	N/A
143	Kyei Linn Gems & Jade Company	U AHEIK KWYE	MYANMAR	10%	Nc	Nc

No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity	Name of the Stock exchange
		U AHEIK TUN	MYANMAR	10%	Nc	Nc
		DAW YIN YIN	MYANMAR	10%	Nc	Nc
		U MAUNG LAY	MYANMAR	50%	Nc	Nc
		DAW NILAR AUGN	MYANMAR	10%	Nc	Nc
		U SAN AUNG	MYANMAR	10%	Nc	Nc
144	Silver Sand Stone Gems co.,	Daw Aye Sander Thin	1/MaKaTa(A)000878	50%	Nc	Nc
		U Soe Aung Kha	13/KaMaNa(N)089140	30%	Nc	Nc
		U Min Kai	13/KaKaNa(N)043923	20%	Nc	Nc
145	Wan Chang	U Tin Sein	Myanmar	68%	Nc	Nc
		U Maung Maung Aung	Myanmar	14%	Nc	Nc
		U Than Tun Aung	Myanmar	14%	Nc	Nc
		Daw Myint Myint Thein	Myanmar	4%	Nc	Nc
146	Khaing Lon Gems Co., Ltd	U Thiha Aung	13/La Ya Na (N) 083483	100%	Nc	Nc
		Daw Hla Myat Thu	12/Ba Ha Na (N) 081655	0%	Nc	Nc
147	PON TUNG THARR GEMS COMPANY LIMITED	U Myint San	Myanmar	550%	Nc	Nc
		U Thein Myint	Myanmar	300%	Nc	Nc
		Daw Moe Moe Lwin	Myanmar	450%	Nc	Nc
148	Palaung National					
149	Treasure Linn Gems Co.,Ltd	D Ei Ei Htwe	Nc	97%	Nc	Nc
		U Myint Zaw	Nc	2%	Nc	Nc
		D Hnin Hnin	Nc	2%	Nc	Nc
150	Treasure White Lotus	U EIKE TI	Nc	99%	Nc	Nc
		D PHYO PHYO SAN	Nc	1%	Nc	Nc
151	Sein Thura San	U YONE SEIN	MYANMAR	49%	No	N/A
		DAW SAN SAN NYO	MYANMAR	49%	No	N/A
		DAW KAY ZIN YU	MYANMAR	2%	No	N/A
152	Aung Shwe Kabar	U Brang Seng	Myanmar	8%	N/A	N/A
		U Gam Moon	Myanmar	22%	N/A	N/A
		U Hkyet Htein Nan	Myanmar	22%	N/A	N/A



No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity	Name of the Stock exchange
		U Hkun Aung	Myanmar	8%	N/A	N/A
		U Naw Ji	Myanmar	8%	N/A	N/A
		U N-Bwi Brang Aung	Myanmar	8%	N/A	N/A
		U Yin Chang	Myanmar	8%	N/A	N/A
		U Brang Tawng	Myanmar	8%	N/A	N/A
		U Khun Aung	Myanmar	8%	N/A	N/A
153	San Taw Win	Daw Aye Aye Win	Myanmar	22%	Nc	Nc
		U Thant Sin Phyo	Myanmar	22%	Nc	Nc
		Daw Tin Moe Khine	Myanmar	33%	Nc	Nc
		Daw Yan Lin May	Myanmar	11%	Nc	Nc
		U Yan Kwal Kyan	Myanmar	11%	Nc	Nc
		U Phyo Wai Naing	Myanmar	0%	Nc	Nc
154	Jade Crystal Palace	U AikLA	Myanmar	60%	No	N/A
		U Kyaw Min	Myanmar	20%	No	N/A
		U Swe Tin	Myanmar	20%	No	N/A
155	Shwe Hwa	Nc	Nc	Nc	Nc	Nc
156	Aung Myin Thu Gems & Jewellery Co.,Ltd	Aung Myin Thu Gems & Jewellery Co.,Ltd	Nc	100%	No	N/A
157	Gold Jade	Nc	Nc	Nc	Nc	Nc
158	Thet Hein Gems & Jewellery Co;Ltd.	Daw Su Su Mon	Myanmar 7/TaNgNaNa (Naing) 097527	10100%	Nc	Nc
		U Thein Shwe	Myanmar 13/TaKaNa (Naing) 129160	80000%	Nc	Nc
159	Myanmar Rich Land Gems	Daw Yin Yin	Myanmar	96%	Nc	Nc
		U Yone Shwe	Myanmar	4%	Nc	Nc
160	MEGA STAR JEWEL LIMITED	Daw Kyu Shin	Myanmar	21%	Nc	Nc
		Daw Lee Kway Shan	Myanmar	49%	Nc	Nc
		U Chein Soak	Myanmar	10%	Nc	Nc
		U Myint Zaw Hein	Myanmar	10%	Nc	Nc
161	Kan Sein Pwint	U Maji Dee Ram	Myanmar	25%	N/A	N/A
		U Maji Hpung Aung	Myanmar	25%	N/A	N/A
		U Mangyi Singwah	Myanmar	25%	N/A	N/A

No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity	Name of the Stock exchange
		Daw Ahkon Chan	Myanmar	25%	N/A	N/A
162	Myanmar Winning Gate (GMWG)	Nc	Nc	Nc	Nc	Nc
		U Tun Kyaw Win	Myanmar	1%	Nc	Nc
163	San Family	U San Tin	Myanmar	98%	Nc	Nc
		Daw Shwe Nu	Myanmar	1%	Nc	Nc
		U Nay San	Myanmar	1%	Nc	Nc
164	HONG YENG YEE SHIN GEMS & JADE COMPANY LTD	U San Tin	Myanmar	99%	Nc	Nc
165	Green Comet gems& Jade company	Nc	Nc	Nc	Nc	Nc
		U KYI WIN	Nc	35%	Nc	Nc
166	Gandawin Kyaut Myat Garden	D KYU SHIO	Nc	30%	Nc	Nc
		U THEIN HAN OO	Nc	35%	Nc	Nc
		La Awng	Myanmar	7%	No	N/A
		La bang Tu Lum	Myanmar	7%	No	N/A
167	Kaung Taw Myay	Lahpai Zau Doi	Myanmar	15%	No	N/A
		N HPRAU GAM	Myanmar	42%	No	N/A
		Zau Hpan	Myanmar	28%	No	N/A
		U Nyein Chan Maung	Myanmar	0%	No	N/A
168	U Hla Soe Oo	U Hla Soe Oo	Myanmar	100%	Nc	Nc
		Daw Thidar Aye	Myanmar	94%	Nc	Nc
169	80000	U Tun Myint	Myanmar	6%	Nc	Nc
		U Aik San	Myanmar	100%	No	N/A
170	Than Lwin Kyaw Kyar	Daw Hnin Hnin Oo	Myanmar	0%	No	N/A
171	Kyauk Myet Shwe Pyi	Nc	Nc	Nc	Nc	Nc
		U Thein Aung	Myanmar	15%	N/A	N/A
		U Yan Aung	Myanmar	27%	N/A	N/A
172	Moe Brothers	U Than Aung	Myanmar	16%	N/A	N/A
		Daw Yin Shwin	Myanmar	17%	N/A	N/A
		U Kyaw Lin	Myanmar	25%	N/A	N/A
		Daw Thidar Win	Myanmar	1%	N/A	N/A

No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity	Name of the Stock exchange
173	Innwa Nay Chi Co	U AUNG KYAW KHAING	Citizen	51%	No	N/A
		DAW THIDAR OHN	Citizen	49%	No	N/A
174	Jade Master	U San Tin	Myanmar	80%	Nc	Nc
		U Tun Kyaw Win	Myanmar	20%	Nc	Nc
175	Taw Win Jade Dragon	U Sai Soe Win	Myanmar	50%	Nc	Nc
		Daw Nan Aye Khine	Myanmar	50%	Nc	Nc
176	Shwe Tun Win	Yang Chini Yu	Myanmar	60%	Nc	Nc
		Tun Win	Myanmar	10%	Nc	Nc
		Yang Chin Kwan	Myanmar	10%	Nc	Nc
		Yein Fee	Myanmar	10%	Nc	Nc
		U Win Htaik	Myanmar	10%	Nc	Nc
177	Kan Thar Yar Gems Co.,Ltd.	Nc	Nc	Nc	Nc	Nc
178	Jade Brothers	U GON DAN DU	MYANMAR	11%	No	N/A
		U HLA TUN @ U HLA TAUNG	MYANMAR	8%	No	N/A
		U KAUNG KWE PINN @ U SHWE MYINT	MYANMAR	67%	No	N/A
		U KHUN AUNG	MYANMAR	9%	No	N/A
179	Myat Myittar Mon (G & J) Co.,Ltd					
180	Pang Huke Duwa Co.,Ltd	U La Phai Hkun Sa	Myanmar	49%	No	N/A
		U Au Ra Tang	Myanmar	25%	No	N/A
		U Thant Zin	Myanmar	14%	No	N/A
		U Zaw Yaw	Myanmar	13%	No	N/A
181	Shwe Pyi Thar Gems Trading and Faceting Co-op.,Ltd	DAW SAN SAN	MYANMAR	25%	Nc	Nc
		U KYAW KYAW ZIN	MYANMAR	25%	Nc	Nc
		U THAN AUNG	MYANMAR	5%	Nc	Nc
		DAW KHIN KHIN CHAW LWIN	MYANMAR	20%	Nc	Nc
		U TIN AUNG SOE	MYANMAR	5%	Nc	Nc
		U ZAR NI OO	MYANMAR	20%	Nc	Nc
182	Khant Shwe Pyi Co.,Ltd	U Zaw Bo Khant	Myanmar	44%	Nc	Nc
		Daw Marlar Phyu	Myanmar	33%	Nc	Nc

No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity	Name of the Stock exchange
		Daw Moe Pwint Phyu Aung	Myanmar	12%	Nc	Nc
		Daw Poe Ei Kyawe	Myanmar	12%	Nc	Nc
183	Nilar Yoma	U Aung Ko Win	Myanmar	42%	No	N/A
		Daw Nan Than Htwe	Myanmar	33%	No	N/A
		Daw Nang Lang Kham	Myanmar	25%	No	N/A
184	Lyan Shan	Nc	Nc	Nc	Nc	Nc
185	Yadanar Myat Noe Thwe Gem	DAW MOE SANDAR TUN	Citizen	51%	No	N/A
		DAW KHIN MA MA @ DAW TIN NWE WIN	Citizen	49%	No	N/A
186	Kyi Wai Yan	U LIN HTET AUNG	Citizen	75%	No	N/A
		U CHIT MIN THU	Citizen	25%	No	N/A
187	Yadanar San Shwin Gem	U San Hlaing	Myanmar	98%	Nc	Nc
		Daw Yi Yi Cho	Myanmar	2%	Nc	Nc
188	HERA Co.,ltd	Hare Lall	Myanmar	50%	N/A	N/A
		Toap Kumar	Myanmar	50%	N/A	N/A
189	MOGOK PRIDE	Daw Myo Sandy Khin	MYANMAR	20%	Nc	Nc
		Shwe Yaung Ku@ U Soe Hlaing	MYANMAR	12%	Nc	Nc
		U Hlaing Myint	MYANMAR	12%	Nc	Nc
		U San Myo	MYANMAR	55%	Nc	Nc
190	EXCELLENT RUBY & SAPPHIRE	Nc	Nc	Nc	Nc	Nc
191	CHATKIYAY GEMS & JEWELLERY CO.,LTD	Nc	Nc	Nc	Nc	Nc
192	SHWE NAING TUN	Nc	Nc	Nc	Nc	Nc
193	R.B.G	Nay Win Swe@Nay Win Tun	Myanmar	42%	No	N/A
		Daw Myint Myat Thu	Myanmar	40%	No	N/A
		Aye Aye Myint	Myanmar	6%	No	N/A
		Ye Myat Thu	Myanmar	4%	No	N/A
		Min Myat Thu	Myanmar	4%	No	N/A
		Too Maung	Myanmar	4%	No	N/A
194	KHINE THIT SAR	Nay Win Swe(a)Nay Win Tun	Myanmar	21%	No	N/A
		Ye Myat Thu	Myanmar	53%	No	N/A

No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity	Name of the Stock exchange
		Aye Aye Myint	Myanmar	7%	No	N/A
		Myint Myat Thu	Myanmar	8%	No	N/A
		Min Myat Thu	Myanmar	4%	No	N/A
		Sein Htwe	Myanmar	6%	No	N/A
		Kyaw Khine	Myanmar	1%	No	N/A
195	Myanmar Lar Ba Gems Co., Ltd.	U Zin Ko Latt	Myanmar	60%	Nc	Nc
		U Myint Moe	Myanmar	40%	Nc	Nc
196	METAL METERO	U Arkar Kyaing	12/LaThaNa(N)021457	50%	Nc	Nc
		Daw Theingi lln	12/SaKhaNa(N)057096	50%	Nc	Nc
197	RUBY TIGER	U Than Htut	Myanmar	57%	N/A	N/A
		U Saw Aye Naing	Myanmar	14%	N/A	N/A
		Daw Han Ni Aung	Myanmar	14%	N/A	N/A
		Daw Soe Sandi	Myanmar	14%	N/A	N/A
198	THAN HTIKE LU	Nc	Nc	Nc	Nc	Nc
199	BIRDS GEM	Nc	Nc	Nc	Nc	Nc
		Daw Shu Mate	MYANMAR	8%	Nc	Nc
		U Kyein Chan@U Saw Lwin	MYANMAR	28%	Nc	Nc
200	ZABUKYAWAUNG	U Kyaw Min Lwin	MYANMAR	28%	Nc	Nc
		U Kyaw Min Aung@U Hteik Wai	MYANMAR	13%	Nc	Nc
		U Kyaw Min Htet@U Hteik Shwin	MYANMAR	13%	Nc	Nc
		U Kayw Min Htut@U Htike Shwe	MYANMAR	13%	Nc	Nc
201	KYAN FAMILY	Nc	Nc	Nc	Nc	Nc
		Daw Aye Aye Myint	MYANMAR	2%	Nc	Nc
		Daw Htay Htay	MYANMAR	85%	Nc	Nc
202	HTAY PAING	Khin Eaint Mon	MYANMAR	2%	Nc	Nc
		U Law Oo	MYANMAR	5%	Nc	Nc
		Daw Shaw May	MYANMAR	5%	Nc	Nc
		Daw Khin Htwe	MYANMAR	2%	Nc	Nc
203	RED MOUNTAIN	Nc	Nc	Nc	Nc	Nc

No.	Company	Name	Nationality of the Entity	% Interest	Publicly Listed entity	Name of the Stock exchange
204	KYAW NAING & BROTHERS	U KYAW NAING	MYANMAR	10%	No	N/A
		U WAM SEIN YINT	MYANMAR	3%	No	N/A
		U SAI SINC	MYANMAR	3%	No	N/A
		U SAI KYAW SHI	MYANMAR	42%	No	N/A
		U SAI CHIN	MYANMAR	42%	No	N/A
		U AUNG CHAN MIN	MYANMAR	0%	No	N/A
205	LAW LU	U Law Lu@U Hla Moe	Myanmar	60%	Nc	Nc
		Daw Soe Thandar Win	Myanmar	40%	Nc	Nc
206	MYANMAR SITHU	U Wang Shan Lyan @ U Khin Maung Soe	Myanmar	33%	Nc	Nc
		Daw San San Aye	Myanmar	50%	Nc	Nc
		U Chit Lwin Oo @U Chit Oo Lwin	Myanmar	7%	Nc	Nc
		U SiThu	Myanmar	7%	Nc	Nc
		U Chit Khaing	Myanmar	3%	Nc	Nc
207	THEITHI AUNG NGWE MOE	U Sai Soe Win	Myanmar	100%	Nc	Nc
208	Pwint Phoo Nadi	Khin Kyu Kyu Shein	Myanmar	25%	Nc	Nc
		Myint Aung	Myanmar	25%	Nc	Nc
		War War Chit	Myanmar	50%	Nc	Nc
209	Myanmar Economic Corporation	Nc	Nc	Nc	Nc	Nc

## Other Minerals

No.	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects) Description of the projects (activities undertaken, beneficiaries, objectives..)	Project cost incurred during 2017-2018	Purpose of payment ("Resettlement" or "Sustainability")	Legal/contractual basis of the payment (Ref to the agreement, Act, ..)*
				Amount (Kyat)	Date				
1	NATIONAL PROSPERITY COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
2	MYANMAR ECONOMIC CORPORATION LIMITED								
3	GEO ASIA INDUSTRY & MINING COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
4	CORNERSTONE RESOURCES ( MYANMAR ) LTD.	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
5	ETERNAL MINING COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
6	MYANMA ECONOMIC HOLDINGS PUBLIC COMPANY LIMITED	N/C	N/C	676,261,120	N/C	N/C	N/C	N/C	N/C
7	KAYAH STATE MINERAL PRODUCTION COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
8	SHWE MOE YAN COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
9	GPS JOINT VENTURE COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
10	SHWE TAUNG MINING COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
11	DELCO LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
12	MAX (MYANMAR) COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
13	FIRST RESOURCES COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
14	PACIFIC LINK CEMENT INDUSTRIES LIMITED								
15	WIN MYINT MO INDUSTRIES COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
16	No.(2)Heavy Industry, Ministry of Industry	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
17	MYANMAR PONGPIPAT COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
18	NGWE YI PALE MINING COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
19	NEW DAYS ASIA MINING COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
20	HTOO INTERNATIONAL INDUSTRY GROUP COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
21	HARBOR STAR MINING COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
22	MANDALAY GOLDEN FRIEND MINING CO., LTD.	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
23	MYANMAR GOLDEN POINT FAMILY CO., LTD.	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
24	THAN TAW MYAT COMPANY LIMITED	N/C	Kyautsae Township	200,000,000	10.8.2017	N/C	N/C	Sustainability	N/C
		N/C	Kyautsae Township	100,000,000	9.10.2017	N/C	N/C	Sustainability	N/C

No.	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects) Description of the projects (activities undertaken, beneficiaries, objectives..)	Project cost incurred during 2017-2018	Purpose of payment ("Resettlement" or "Sustainability")	Legal/contractual basis of the payment (Ref to the agreement, Act, ..)*
				Amount (Kyat)	Date				
25	TUN THWIN MINING COMPANY LIMITED								
26	MANDALAY DISTRIBUTION & MINING COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
27	YCDC	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
28	SAN LIN INTERNATIONAL EXPORT & IMPORT COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
29	KAN PWINT OO MINING COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
30	TOP TEN STAR PRODUCTION CO., LTD.	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
31	HEAY HEIN COMPANY LIMITED	N/C	N/C	11,000,000	N/C	N/C	N/C	N/C	N/C
32	NGWE KABAR MYANMAR COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
33	MYAUK KYUN THU MA MA MINING & REFINERY COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
34	XIE SHAN MINING PRODUCTION & MARKETING COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
35	DRAGON CEMENT COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
36	PRINCE MANUFACTURING COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
37	HTAT YEE LINN MINING & REFINERY COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
38	MYAY NAGAR MINING COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
39	THA BYU MINING COMPANY LIMITED								
40	YE HTUT KYAW MINING COMPANY LIMITED	N/C	N/C	N/C	2017-2018	N/C	N/C	N/C	N/C
41	MYANMAR TIN -TUNGSTEN COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
42	Myanmar Yang Tse Copper Ltd	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
43	Eden Energy & Natural Resources Development Co., Ltd	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
44	Kanbawza Industries Ltd	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
45	MYANMAR WANBAO MINING COPPER LTD	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
46	HTAR WA YA								
47	MYANMAR CNMC NICKEL COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
48	24 HOUR MINING & INDUSTRY COMPANY LIMITED	N/C	N/C	6,779,100	N/C	N/C	N/C	N/C	N/C
49	A & A NATURAL RESOURCES DEVELOPMENT CO., LTD	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
50	ASIA PHYO MINING COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C



No.	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects) Description of the projects (activities undertaken, beneficiaries, objectives..)	Project cost incurred during 2017-2018	Purpose of payment ("Resettlement" or "Sustainability")	Legal/contractual basis of the payment (Ref to the agreement, Act, ..)*
				Amount (Kyat)	Date				
51	BLUE DIAMOND CEMENT COMPANY LIMITED	Nyaung Nyunt Thazi Township Mandalay Region	Nyaung Nyo	N/C	2017-2018	Donate Cement to Schools (50 kg bags)	707	N/C	N/C
			N/C	N/C	N/C	Donate Cement to the Warehouse	706	N/C	N/C
			N/C	N/C	N/C	Donate Cement to Monasteries	730	N/C	N/C
			N/C	N/C	N/C	Donate Cement to the District Administrator's Office	687	N/C	N/C
52	DAGON MINING COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
53	DIAMOND SHARK MINING COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
54	Directorate of Military office of Chief of Defence Industries, Ministry of Defence								
55	GREEN ASIA COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
56	GREEN STRATEGIC MINING COMPANY LIMITED								
57	GROUP OF FOUR MINING COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
58	HTUT KHAUNG KYAW MINING COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
59	JUNE CEMENT INDUSTRY LTD.	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
60	LINN PYAE MINING COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
61	LOI CHAI NAGAR MINING COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
62	MAY FLOWER MINING ENTERPRISES LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
63	MINING WORLD COMPANY LIMITED								
64	MOUNT CHING YING MINING COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
65	MYANMAR APEX MINING CO., LTD	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
66	MYANMAR NAING GROUP MINING COMPANY LTD	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
67	MYANMAR SIMCO SONG DA JOINT STOK COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
68	MYINT INVESTMENT GROUP COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
69	No.(3) Heavy Industry. Ministry Of Industry								
70	SHWE PAUK PAUK MINING COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
71	SHWE PIN LE MINING & INDUSTRY COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
72	SILVER BRIGHT COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C

No.	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects) Description of the projects (activities undertaken, beneficiaries, objectives..)	Project cost incurred during 2017-2018	Purpose of payment ("Resettlement" or "Sustainability")	Legal/contractual basis of the payment (Ref to the agreement, Act, ..)*
				Amount (Kyat)	Date				
73	THE SILVER LION MINING COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
74	THIHA THANT HEIN MINING COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
75	TRIPLE "A" CEMENT INTERNATIONAL COMPANY LIMITED	N/C	Kyaukse	N/C	27/07/2017	560 Bag	N/C	N/C	N/C
		N/C	N/C	N/C	27/07/2017	N/C	N/C	N/C	N/C
		N/C	N/C	N/C	27/07/2017	N/C	N/C	N/C	N/C
		N/C	N/C	N/C	27/07/2017	N/C	N/C	N/C	N/C
		N/C	N/C	N/C	27/07/2017	N/C	N/C	N/C	N/C
		N/C	N/C	N/C	01/09/2017	N/C	N/C	N/C	N/C
		N/C	N/C	N/C	30/09/2017	N/C	N/C	N/C	N/C
76	U E EXPORT IMPORT COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
77	UNITED CEMENT COMPANY LIMITED								
78	YIG COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
79	YOUNG INVESTMENT GROUP COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
80	SEA SUN STAR MINING PRODUCTION & MARKETING COMPANY LIMITED								
81	ZABU TALU MINING COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
82	RUBY DRAGON MINING COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
83	HTAY FAMILY COMPANY LIMITED								
84	SEIN CHI LIN MINING CO/, LTD/	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
85	AUNG HTUN LINN SHEIN WIN MINING & REFINERY COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
86	Future Mining Co/,Ltd								
87	Future Engineering Gold Mining	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
88	SHWE MYINT THAUNG YINN INDUSTRY & MANUFACTURING COMPANY LIMITED								
89	MYANMAR MYO KO KO MEDICAL INSTRUMENT COMPANY LIMITED								
90	SAT WINE INN ARR MINING COMPANY LIMITED								
91	SHWE SAPAR MINING COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C

No.	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects) Description of the projects (activities undertaken, beneficiaries, objectives..)	Project cost incurred during 2017-2018	Purpose of payment ("Resettlement" or "Sustainability")	Legal/contractual basis of the payment (Ref to the agreement, Act, ..)*
				Amount (Kyat)	Date				
92	NAN KANAUNG MINING & ENGINEERING COMPANY LIMITED	Alamna village road construction	Alaman villager, Bokeypyin township	N/C	43161	N/C	N/C	N/C	N/C
93	NEW ERA GOLD COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C
94	SHWE PYI NAGAR COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C	N/C

## Annex 9 Mandatory Social Expenditure

### Oil and Gas sector

No.	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)	Project cost incurred during 2017-2018	Purpose of payment ("Resettlement" or "Sustainability")	Legal/contractual basis of the payment (Ref to the agreement, Act, ..)*
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives..)			
1	Shell Myanmar Energy Pte. Ltd. - Yangon Branch	N/C	N/C	362,400	N/C	N/C	N/C	N/C	N/C

### Other Minerals sector

No.	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)	Project cost incurred during 2017-2018	Purpose of payment ("Resettlement" or "Sustainability")	Legal/contractual basis of the payment (Ref to the agreement, Act, ..)*
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives..)			
6	MYANMA ECONOMIC HOLDINGS PUBLIC COMPANY LIMITED	N/C	N/C	676,261,120	N/C		N/C	N/C	N/C
24	THAN TAW MYAT COMPANY LIMITED	N/C	Kyautsae Township	200,000,000	10.8.2017		N/C	Sustainability	N/C
		N/C	Kyautsae Township	100,000,000	9.10.2017		N/C	Sustainability	N/C
31	HEAY HEIN COMPANY LIMITED	N/C	N/C	11,000,000	N/C		N/C	N/C	N/C
40	YE HTUT KYAW MINING COMPANY LIMITED	N/C	N/C	N/C	2017-2018		N/C	N/C	N/C
48	24 HOUR MINING & INDUSTRY COMPANY LIMITED	N/C	N/C	6,779,100	N/C		N/C	N/C	N/C
51	BLUE DIAMOND CEMENT COMPANY LIMITED	Nyaung Nyunt	Nyaung Nyo	N/C	2017-2018	Donate Cement to Schools (50 kg bags)	707	N/C	N/C
		Thazi Township	N/C	N/C	N/C	Donate Cement to the Warehouse	706	N/C	N/C
		Mandalay Region	N/C	N/C	N/C	Donate Cement to Monasteries	730	N/C	N/C
		N/C	N/C	N/C	N/C	Donate Cement to the District Administrator's Office	687	N/C	N/C
75	TRIPLE "A" CEMENT INTERNATIONAL COMPANY LIMITED	N/C	Kyaukse	N/C	27/07/2017	560 Bag	N/C	N/C	N/C
		N/C	N/C	N/C	27/07/2017	N/C	N/C	N/C	N/C
		N/C	N/C	N/C	27/07/2017	N/C	N/C	N/C	N/C

No.	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects) Description of the projects (activities undertaken, beneficiaries, objectives..)	Project cost incurred during 2017-2018	Purpose of payment ("Resettlement" or "Sustainability")	Legal/contractual basis of the payment (Ref to the agreement, Act, ..)*
				Amount (Kyat)	Date				
		N/C	N/C	N/C	27/07/2017	N/C	N/C	N/C	N/C
		N/C	N/C	N/C	27/07/2017	N/C	N/C	N/C	N/C
		N/C	N/C	N/C	01/09/2017	N/C	N/C	N/C	N/C
		N/C	N/C	N/C	30/09/2017	N/C	N/C	N/C	N/C
92	NAN KANAUNG MINING & ENGINEERING COMPANY LIMITED	Alamna village	Alaman villager, Bokepyin township	N/C	02/03/2018	N/C	N/C	N/C	N/C
Total				994,040,220					

## Pearl

No .	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)	Project cost incurred during 2017-2018	Purpose of payment ("Resettlement" or "Sustainability")	Legal/contractual basis of the payment (Ref to the agreement, Act, ..)*
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives..)			
1	Myanmar Andman Co., Ltd	N/C	Zadike island, Tanintharyi Division	620,000	07/09/2017	Education Fund for Zadike Island	Yes	N/C	N/C
		N/C	Hinthata Town, Ayarwaddy Division	18,690,000	19/6/2017	Education fund for primary School	Yes	N/C	N/C
		N/C	Rakhine State	10,000,000	13/9/2017	Donation for Flood refugees	Yes	N/C	N/C
Total				29,310,000					

## Annex 10 Voluntary Social Expenditure

### Oil and Gas

No.	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)	Project cost incurred during 2017-2018	Project cost incurred during 2017-2018 (Kyat)
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives.)		
1	Gold Petrol Joint Operating Company Inc., (GJOC Inc.)	N/C	Yenangyaung	4,000,000	08/12/2017	1st payment for Expenses of Drilling deep water well (700') at Kan Thar village in Sakan Kan village group , Yng township;UTW/UKY/UZMH/USN	N/C	N/C
			Yenangyaung	4,000,000	10/01/2018	Final payment for Expenses of Drilling deep water well (700') at Kan Thar village in Sakan Kan village group , Yng township;UTW/UKY/UZMH/USN	N/C	N/C
			Yenangyaung	10,000,000	27/02/2018	1st partial payment for making Human cremate Building Construction.(CSR-2017)	N/C	N/C
			Yenangyaung	10,000,000	28/03/2018	2nd partial payment for makng Human cremate Building Construction.(CSR-2017)	N/C	N/C
			Yenangyaung	9,000,000	28/03/2018	1st partial payment for making football stadium for stand building;UKS/UYA	N/C	N/C
			Chauk	16,000,000	30/01/2018	Truck for Garbage Collection in Chauk City Development Committee	N/C	N/C
			Chauk	8,300,000	10/02/2018	Transformer for No 14 Block in Chauk Township	N/C	N/C
			Chauk	27,300,000	09/03/2019	Concrete Tank (50000 Gals)for water storage at No 15 Block in Chauk Township	N/C	N/C
			Chauk	7,000,000	09/03/2019	Draing Ditch around market in Salary, Chauk Township	N/C	N/C
			Chauk	8,000,000	09/03/2019	Concrete Tank (10000 Gals) for water storage at Lanywa	N/C	N/C
			Chauk	11,400,000	09/03/2019	Concrete road to cemetery in May Ni Gone Village, Chauk Township]	N/C	N/C
2	MPRL E&P Pte Ltd. ( Yangon Branch )	N/C	N/C	732,673,540	N/C	N/C	N/C	N/C
3	PC Myanmar (Hong Kong) Limited	N/C	N/C	383,320,229	N/C	Youth Programme	N/C	N/C

No.	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)	Project cost incurred during 2017-2018	Project cost incurred during 2017-2018 (Kyat)
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives.)		
4	Posco Daewoo Corporation (Myanmar E&P Office)	Ministry of Education	Gwa	212,116,629	N/C	Two Story Building at Saththwar High School (Recommended by Rakhine State Government) (100'x30')	N/C	N/C
		Ministry of Education	Kyaukpyu	211,978,525	N/C	Demolition of Old School Building & Construction of Two-Story Building at Myoma Affiliated High School in Kyaukpyu (100'x30')	N/C	N/C
		Ministry of Education	Rakhine State	13,667,913	N/C	Provision of Teaching Aids to newly constructed school buildings	N/C	N/C
		17 Deserving Students from Rakhine State	Rakhine State	69,011,238	N/C	Shwe Scholarship Program (17 deserving students)	N/C	N/C
		Students from Gonechwein/ Malakyun	Gonechwein/ Malakyun	2,966,222	N/C	Computer Training Courses	N/C	N/C
		Local Residents from Gonechwein & Malakyun	Gonechwein/ Malakyun	23,769,463	N/C	Shwe Free Medicare Centers	N/C	N/C
		Ministry of Health	Kyaukpyu	65,671,704	N/C	Provision of Medical Equipment	N/C	N/C
		Local Residents from Lamuumaw	Maei (Taunggup Tsp.)	34,375,460	N/C	Construction of Spillway at Lamumaw Village in Maei Township (Recommend by Rakhine State Government)	N/C	N/C
		Local Residents	Kyaukpyu	18,492,422	N/C	Construction of Earth Ponds (100'x100'x6') (4 Nos) / Other Water Supply	N/C	N/C
		Local Residents from Kyaukpyu	Kyaukpyu	57,493,452	N/C	Installation of Lamp Post (Phase II) at Kyaukpyu (Recommended by Rakhine State Government in FY 2016-2017)	N/C	N/C
		Local Residents from Gonechwein	Gonechwein	169,409,709	N/C	Upgrading Interconnection Road (Phase IV) at Gonechwein	N/C	N/C
		Local Residents from Malakyun	Malakyun	170,121,515	N/C	Upgrading Interconnection Road (Phase III) at Malakyun	N/C	N/C
		Local Residents from Manaung	Manaung	211,507,920	N/C	Feasibility Study of Electricity Distribution in Manaung Island	N/C	N/C
		Local Residents from 5 Villages	5 Villages in Kyaukpyu	203,373,000	N/C	Village Development Project (Phase II) (KOICA & DOA)	N/C	N/C

No.	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)	Project cost incurred during 2017-2018	Project cost incurred during 2017-2018 (Kyat)
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives.)		
		Local Residents from Rakhine State	Rakhine State	166,146,589	N/C	Provision of 660L Mobile Garbage Bins/ Garbage Collection Trucks	N/C	N/C
		Local Residents from Rakhine State	Rakhine State	266,406,048	N/C	Plantation of Fresh Water Trees along the Highway of Tounoup - Maei - Ann - Minbya	N/C	N/C
		Local Residents & Tree Growers from Kyaukpyu	Kyaukpyu	180,012,221	N/C	M&E / Mangrove Conservation Program	N/C	N/C
		Local Residents from Kyaukpyu	Kyaukpyu	23,392,451	N/C	Green Kyaukpyu Campaign	N/C	N/C
		Local Residents from Malakyun	Malakyun	21,772,500	N/C	Construction of Pit Latrine 75 Nos in Malakyun Village	N/C	N/C
5	PTTEP International Ltd.	School students	10 villages in Kanbaw area, Yeabhyu Tsp, Tanintharyi Region	68,838,204	N/C	Parasite Free School Program - Medical checkup - Diagnosis and treatment - Health Training	N/C	N/C
		School students	11 villages in Kanbaw area, Yeabhyu Tsp, Tanintharyi Region	29,625,896	N/C	Higher Education Assistance for Development Program - Provide continuous scholarship to qualified students to continue their study in college or university level	N/C	N/C
		90 Technical students	Myanmar country	268,319,840	N/C	High Vocational Diploma Scholarship	N/C	N/C
		1 student	Yangon region	11,546,400	N/C	Undergraduate Oversea Scholarship	N/C	N/C
		Teachers	Ohnbinkwin School and Paya (South) Post Primary Schools, Yeabhyu Tsp, Tanintharyi Region	90,296,800	N/C	Construction of teacher accommodation in 2 schools	N/C	N/C
		School students and teachers	The' Chaung Primary School, Yeabhyu Tsp, Tanintharyi Region	78,293,600	N/C	Construction of one school building in The' Chaung	N/C	N/C
		Villagers	Kaleinaung and Kaw Hlaing villages, Yeabhyu Tsp, Tanintharyi Region	16,845,400	N/C	Utility Supply Improvement - 2 Clean Drinking Water system, Overhead tank and Piping Installation	N/C	N/C
		Villagers	Yephyu Tsp, Tanintharyi Region	5,239,000	N/C	Infrastructure, Utility Supply Improvement and Miscellaneous (Support village and school activities, emergency relief, etc.)	N/C	N/C
		Villagers and monks	Zimba village, Yeabhyu Tsp, Tanintharyi Region	15,350,000	N/C	Monastery support for building construction	N/C	N/C



No.	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)	Project cost incurred during 2017-2018	Project cost incurred during 2017-2018 (Kyat)
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives.)		
		Monks	Yangon region	15,350,000	N/C	Monastery support	N/C	N/C
		425 trainees	Yangon region	42,955,460	N/C	Technical Capability Building and Development Program incorporative with Ministry of Energy and Ministry of Labour	N/C	N/C
		General Villagers and monks	Yangon region	6,034,000	N/C	Tree plantation	N/C	N/C
			Kaleinaung, Yeabhyu Tsp, Tanintharyi Region	27,060,000	14/12/2017	N/C	N/C	N/C
		Villagers	Se Ywar, Htan Lay Pin, Lae Pin, Thet Kal, Min De', Kyauk Me', Taung Myint and Moe Nat Kone villages in Thayet and Kanma Townships, Magway Region	12,000,000	N/C	Mobile Health Check Program in 8 villages	N/C	N/C
		Villagers	Thayet and Kanma Townships, Magway Region	4,162,116	N/C	Infrastructure, Utility Supply Improvement and Miscellaneous (Support village and school activities, emergency relief, etc.)	N/C	N/C
		Villagers	Thayet Township, Magway Region	2,229,800	N/C	Infrastructure, Utility Supply Improvement and Miscellaneous (Support village and school activities, emergency relief, etc.)	N/C	N/C
		Monks	Thayet and Kanma Townships, Magway Region	17,550,000	N/C	Monastery support in 3 monasteries	N/C	N/C
		425 Trainee	Yangon Region	16,176,737	N/C	Technical Capability Building and Development Program incorporative with Ministry of Energy and Ministry of Labour	N/C	N/C
		EP2	N/C	N/C	N/C	N/C	N/C	N/C
		Villagers	Sinbaungwe Township, Magway Region	250,000	N/C	Support village and school activities, emergency releif, etc	N/C	N/C
		PSCG	N/C	N/C	N/C	N/C	N/C	N/C
		Villagers	Sinbaungwe Township, Magway Region	250,000	N/C	Support village and school activities, emergency releif, etc	N/C	N/C
		Villagers	Pyapone Township, Ayeyarwaddy Region	5,300,000	N/C	Mobile Health Check Program and medical supply for Pyapone Township Hospital	N/C	N/C
		Dhamma School student	Pyapone Township, Ayeyarwaddy Region	3,120,740	N/C	Monastery support for Dhamma School student	N/C	N/C

No.	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)	Project cost incurred during 2017-2018	Project cost incurred during 2017-2018 (Kyat)
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives.)		
		425 Trainee	Yangon Region	8,997,550	N/C	Technical Capability Building and Development Program incorporative with Ministry of Energy and Ministry of Labour	N/C	N/C
6	Total E&P Myanmar	N/C	N/C	N/C	N/C	N/C	N/C	N/C
7	Gail JJ India Ltd							
8	Korea Gas Corporation							
9	Nippon Oil Exploration (Myanmar) Ltd			45				
10	ONGC Videsh Ltd.,							
11	Unocal Myanmar Offshore Co., Ltd.	Pact Institute	Dry Zone - Madaya	813,013,396	12/12/2017	N/C	N/C	N/C
		Pact Institute	Rakine State	34,610,918	07/12/2017	N/C	N/C	N/C
12	Asia Orient International Ltd. (CJs Oc Nobel Oil)							
13	Bashneft International B.V. (Myanmar Branch)							
14	Berlanga Myanmar Pte Ltd., (Myanmar Branch)	N/C	N/C	N/C	N/C	N/C	N/C	N/C
15	BG Exploration & Production Myanmar Pte. Ltd. (Myanmar Branch)	Small-holder fishermen and farmers in Manaung Township, Rakhine State	Manaung Township, Rakhine State			Payment made to BGEPM's social investment partner - Montrose International LLP. Enterprise Development and Support Programme to improve the income and livelihoods of small-holder fishermen and farmers in Manaung Township, Rakhine State,	N/C	N/C
16	Brunei National Petroleum Company Sdn Bhd (PB Myanmar)							
17	CAOG PTE LTD (MYANMAR BRANCH)	N/C	N/C	N/C	N/C	N/C	N/C	N/C
18	CFG Energy Pte Ltd.,	N/C	N/C	N/C	N/C	N/C	N/C	N/C
19	ENI Myanmar B.V. (Myanmar Branch)	N/C	N/C	N/C	N/C	N/C	N/C	N/C

No.	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)	Project cost incurred during 2017-2018	Project cost incurred during 2017-2018 (Kyat)
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives.)		
20	IsTech Energy EP-5 Pte Ltd., (Myanmar Branch)	N/C	N/C	N/C	N/C	N/C	N/C	N/C
21	Jubilant Oil & Gas Pte. Ltd.							
22	North Petro-Chem Corporation Myanmar Ltd. (NPCMM)							
23	Ophir Myanmar (Block AD-3) Limited (Myanmar Branch)	N/C	N/C	N/C	N/C	N/C	N/C	N/C
24	Pacific Hunt Energy Corporation (Myanmar Branch)	N/C	N/C	100,826,611	N/C	N/C	N/C	N/C
25	Parami Energy Development Company Ltd							
26	Apex Geo Services Co.,							
27	Petronas Carigali Myanmar Inc (PCMI)	N/C	N/C	N/C	N/C	N/C	N/C	N/C
28	Petrovietnam Exploration Production Corporation							
29	Reliance Industries Ltd.							
30	Shell Myanmar Energy Pte. Ltd. - Yangon Branch	Citizens - 35,000 people	Tanintharyi Region	N/C	N/C	Access to Energy (A2E) project was introduced to the rural communities in Thanitharyi region providing electricity access using photovoltaic power and microfinance program with the development Partner, PACT. The program improved the lives of around 35,000 people through improved livelihoods and increased access to electricity.	N/C	N/C
		Road Users	Yangon-Mandalay Expressway	N/C	N/C	Shell implemented Road Safety Program to raise awareness amongst drivers on the Yangon-Mandalay	N/C	N/C

No.	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)	Project cost incurred during 2017-2018	Project cost incurred during 2017-2018 (Kyat)
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives.)		
		Farmers in Rakhine State	Rakhine State	N/C	N/C	Expressway (billboards, posters, gadgets and social media posts), saving lives of the road users. Sustainable Agricultural Development programme was implemented to improve vegetable production and improve market access and linkages for the villagers in Rakhine State with development partner, Mercy Corps. The program also included capacity building of government departments and input suppliers.	N/C	N/C
		PhD students	N/C	N/C	N/C	Capacity Building Program for the Water Resources Sector in Myanmar, supporting two PhD scholars at TU DELFT under Integrated Water Resources Management Program.	N/C	N/C
31	SNOG Pte Ltd							
32	Tap Energy (M-7) Co., Ltd. (Statoil)							
33	TRG M15 Pte. Ltd.							
34	Woodside Energy (Myanmar) Pte Ltd	Various	Various	874,393,739	N/C	Sum of voluntary social responsibility spend	Payments made by Woodside Energy (Myanmar) Pte Ltd (Yangon Branch) and its parent company Woodside Energy Ltd.	N/C
35	MOECO Asia Pte. Ltd							
36	Young Investment Group Co. Ltd.	Block-PSC-C1	Indaw-Yenan Area (Sagaing Division)	248,573	09/10/2017	Donation regarding Flooding victim	2017-2018	

No.	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)	Project cost incurred during 2017-2018	Project cost incurred during 2017-2018 (Kyat)
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives.)		
		Block-PSC-C1	Indaw-Yenan Area (Sagaing Division)	12,402	27/11/2017	Donation for Ka Htein Festival at Mawlaik Township-Sagaing Region	2017-2018	
		Block-PSC-C1	Indaw-Yenan Area (Sagaing Division)	692,977	20/12/2017	4 Core 25mm*110M wire Cable to Moliike Hospital	2017-2018	
		Block-PSC-C1	Indaw-Yenan Area (Sagaing Division)	12,396	29/12/2017	(Donation for Mawlaik Sport Celebration at Mawlaik Township)	2017-2018	
		Block-PSC-C1	Indaw-Yenan Area (Sagaing Division)	38,051	08/02/2018	Donation for Pantha High School and Union Day Ceremony at Mawlaik Township-Sagaing Region)	2017-2018	
		Block-PSC-C1	Indaw-Yenan Area (Sagaing Division)	14,687	18/02/2018	Lunch box 50pcs and sample	2017-2018	
		Block-PSC-C1	Indaw-Yenan Area (Sagaing Division)	151,533	05/03/2018	Donation Diesel for Exam at Mawlaik	2017-2018	
		Block-PSC-C1	Indaw-Yenan Area (Sagaing Division)	64,761	09/03/2018	Installation charges for power cable donation at Mawlaik Hospital	2017-2018	
		Block-PSC-C1	Indaw-Yenan Area (Sagaing Division)	16,324,073	28/03/2018	Providing Education, Medical and staff house at Maulaik and Pan Thar Township	2017-2018	
		Block-PSC-H	Taungoo-Pyinmana Area ( Mandalay Division)	106,422	15/08/2017	Projector(MOGE)	2017-2018	
		Block-PSC-H	Taungoo-Pyinmana Area ( Mandalay Division)	198,136	16/11/2017	Laptop for CSR PSC - H ( four township)	2017-2018	
		Block-PSC-H	Taungoo-Pyinmana Area ( Mandalay Division)	394,242	16/11/2017	Projector for CSR PSC -H (For township)	2017-2018	
		Block-PSC-H	Taungoo-Pyinmana Area ( Mandalay Division)	67,279	23/11/2017	Tripod ( Projector Screen) for PSC H CSR	2017-2018	
		Block-PSC-H	Taungoo-Pyinmana Area ( Mandalay Division)	29,750	28/12/2017	crmmk20171239 (Monk Donation or Soft Drink Donation at PC meetings at Waw-Deik-U Township-Bago Region)	2017-2018	
		Block-PSC-H	Taungoo-Pyinmana Area ( Mandalay Division)	25,181	03/01/2018	cbmmk20180106 (Monk Donation for Base Camp Ceremony at Wingabaw Village-Bago Township)	2017-2018	
		Block-PSC-H	Taungoo-Pyinmana Area ( Mandalay Division)	35,245	31/01/2018	doncation of Fris bee	2017-2018	
		Block-PSC-H	Taungoo-Pyinmana Area ( Mandalay Division)	2,135,417	07/02/2018	Generator and 5 wheels frame set	2017-2018	
		Block-PSC-H	Taungoo-Pyinmana Area ( Mandalay Division)	4,454,395	28/03/2018	Provision of Medical serices	2017-2018	

No.	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)	Project cost incurred during 2017-2018	Project cost incurred during 2017-2018 (Kyat)
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives.)		
		Block-PSC-H	Taungoo-Pyinmana Area (Mandalay Division)	201,088	29/03/2018	Donation to Monk at PSC H	2017-2018	
Total				5,946,521,611				

**MOGE**

Beneficiary Identity	Beneficiary Location	Cash Payments (Kyats)						In Kind payments (Projects)	
		Education	Helth	Infrastructure	Others	Total (Kyats)	Date	Description of the projects (activities undertaken, beneficiaries, objectives..)	Project cost incurred during 2017-2018
1	Chauk	95,643,805	13,680,000	122,654,383		231,978,188	N/C	N/C	N/C
1	Yengyaung	28,487,960	19,800,000	109,908,200	20,700,000	178,896,160	N/C	N/C	N/C
2	Mann	45,251,290	51,827,600	123,720,075	1,100,000	221,898,965	N/C	N/C	N/C
3	Pyi	44,101,936	830,000	259,913,110		304,845,046	N/C	N/C	N/C
4	Myanaung	27,001,363	16,313,650	120,202,090		163,517,103	N/C	N/C	N/C
5	ShwePyiTha	89,985,400	4,417,000	86,863,000		181,265,400	N/C	N/C	N/C
6	HtaukSharbin/Kanni	35,400,000	44,900,000	243,948,959		324,248,959	N/C	N/C	N/C
7	Kyaukuk-Lapto-Ayadaw	203,359,000	7,456,000	59,011,000		269,826,000	N/C	N/C	N/C
8	NyaungDone	69,873,000	1,701,000	66,615,000		138,189,000	N/C	N/C	N/C
9	Ma Aubin	42,423,739	21,000,000	145,622,904		209,046,643	N/C	N/C	N/C
10	Apauk	63,960,365	8,500,000	7,998,945		80,459,310	N/C	N/C	N/C
11	TharKyiTauung-Sabai	55,177,900	11,378,000	38,922,450		105,478,350	N/C	N/C	N/C
12	Htan Kine	97,599,284	13,086,000	100,230,498		210,915,782	N/C	N/C	N/C
13	Pipeline						N/C	N/C	N/C
14	(1) Phugyi	28,434,670		12,931,000		41,365,670	N/C	N/C	N/C
	(2) Titut	65,729,000	8,566,000	14,930,500		89,225,500	N/C	N/C	N/C
	(3)Pyawbe	35,235,600	21,433,100			56,668,700	N/C	N/C	N/C
	(4)Shwepyithar	3,360,000	28,618,000			31,978,000	N/C	N/C	N/C
	(5)Dadayee	2,800,000	14,000,000			16,800,000	N/C	N/C	N/C
	(6) Innywa	8,179,000		13,047,900		21,226,900	N/C	N/C	N/C
	(7)Mawlamyaung	31,565,000		7,293,000		38,858,000	N/C	N/C	N/C
	(8)MaAhuBin	6,000,000				6,000,000	N/C	N/C	N/C
	(10) MannHtabin					0	N/C	N/C	N/C
	(a) Control Station	21,740,000		156,865,000		178,605,000	N/C	N/C	N/C
	Thaketa Offshore Base					0	N/C	N/C	N/C

Beneficiary Identity	Beneficiary Location	Cash Payments (Kyats)						In Kind payments (Projects)	
		Education	Helth	Infrastructure	Others	Total (Kyats)	Date	Description of the projects (activities undertaken, beneficiaries, objectives..)	Project cost incurred during 2017-2018
15	CNG (YGN+MDY)	78,910,000		39,740,000		118,650,000	N/C	N/C	N/C
16	HeadOffice			4,490,000		4,490,000	N/C	N/C	N/C
17	Exploration						N/C	N/C	N/C
18	(1) Appline Recerch	2,499,600	4,000,000	3,500,400		10,000,000	N/C	N/C	N/C
	(2) Geology Dept	9,499,075				9,499,075	N/C	N/C	N/C
	(3) Seismic Party (1)			17,913,720		17,913,720	N/C	N/C	N/C
	(4) Seismic Party (2)	6,978,370	8,500,000	1,976,000		17,454,370	N/C	N/C	N/C
	(၅) Seismic Party (3)						N/C	N/C	N/C
	(၆) Seismic Party (4)						N/C	N/C	N/C
	(၁)ရေထွက်အစမ်းတွင်း					0	N/C	N/C	N/C
	(5) Patholone Testwell	116,248,003	0	12,500,000		128,748,003	N/C	N/C	N/C
Total		1,315,443,360	300,006,350	1,770,798,134	21,800,000	3,408,047,844			



## Oil and gas transportation

No.	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)	Project cost incurred during 2017-2018	Purpose of payment ("Resettlement" or "Sustainability")	Legal/contractual basis of the payment (Ref to the agreement, Act, ..)*
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives..)			
1	South East Asia Gas Pipeline Co.,Ltd(Great Ocean Branch)(SEAGP)	Public	Kan Ne, KyaukPhyu, Rakhine State Mandalay Region	67,020,650	N/C	Construction a 3450'x10' line with 1 bridge and 7 pipe-culvert.		Sustainability	SEAGP-2017-JSGCHT-0097
		Public	1.Min Gan, Taungtha 2.Thin Ta Yar, Nwarhtogyi 3.Nyaung Kone, Nwarhtogyi	68,884,415	N/C	1. Install ceilings of 48'x20', construct a wall of 517'. 2.Laying the cable 1.5 miles and installing poles and transformer. 3.Construct a 600'well and a 5000 Gal reservoir and a generator.		Sustainability	SEAGP-2017-JSGCHT-0098
		Public	1.Than Pa Yar, Pyin Oo Lwin, Mandalay Region 2.Nat Lin Khan, NaungCho, Shan State	62,771,293	N/C	1.Construct a (60'x30'x12') RCC teaching building, 2 2-door toilet, 3 blackboards, 20 sets of students' desks and benches and 3 sets of teachers'. 2.Construct a (60'x30'x12') RCC teaching building, 2 2-door toilet, 3 blackboards, 20 sets of students' desks and benches and 3 sets of teachers'.		Sustainability	SEAGP-2017-JSGCHT-0099
		Public	Shan State 1.Naung Pai Lay, Kyaukme 2.Hsun Ai, HsiPaw	38,691,564	N/C	1.Construct a 200'well and a 3000 Gal reservoir. 2.Construct a (60'x30'x12') RCC teaching building, 2 2-door toilet, 3 blackboards, 20 sets of students' desks and benches and 3 sets of teachers'.		Sustainability	SEAGP-2017-JSGCHT-0100
		Public	Namtu, Shan State 1.Pan Tha Pay 2.Nant Taung Koun	77,904,983	N/C	1.Construct a (60'x30'x12') RCC teaching building, 2 2-door toilet, 3 blackboards, 20 sets of students' desks and benches and 3 sets of teachers'. 2.Construct a (60'x30'x12') RCC teaching building, 2 2-door toilet, 3 blackboards, 20 sets of students' desks and benches and 3 sets of teachers'; 620'of 6.5'brick walls (including 1'foundation).		Sustainability	SEAGP-2017-JSGCHT-0096
		Public	Namhkam, Mu Se, Shan State	32,539,680	N/C	One portable X-ray machine and one batch of drugs		Sustainability	SEAGP-2017-JSGCHT-0096
		Public	Taungtha, Myingyan,	81,979,250	N/C	Construct a 6225' long water pipeline from the flesh water lake to downtown; Install a 40 horsepower water suction pump, two 40' high		Sustainability	SEAGP-2017-JSGCHT-0089

No.	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)	Project cost incurred during 2017-2018	Purpose of payment ("Resettlement" or "Sustainability")	Legal/contractual basis of the payment (Ref to the agreement, Act, ..)*
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives..)			
2	Southeast Asia Crude Oil Pipeline (SEAOP)	Public	Mandalay Region Thanpankhine, Nawnghkio, Shan State	10,973,166	N/C	and 12,000 gallons water towers with 5,225' Φ6" PVC pipe, and 1,000' galvanized pipe. 1.Library Room (40'x26'x12') 2.Concrete pavement (4200'x12'x6")		Sustainability	SEAGP-2016-MMHT-0073
		Public	Namhan, Nammadu, Shan State	193,231,466	N/C	Donation of 350 solar electric sources at Namhan		Sustainability	SEAGP-2016-MMHT-0073
		Public	Dee Ma, Muse, Shan State	1,825,340	N/C	Bridge Maintenance		Sustainability	ER00035880
		Public	KyaukPhyu, Rakhine State 1.Ka Lar Bar Taung 2.Thu Bu Taung 3.Pe Tain Se 4.A Nout Myar Tain	127,416,344	N/C	1.Construct a (60'x30'x12') RCC teaching building, 2 2-door toilet, 3 blackboards, 20 sets of students' desks and benches and 3 sets of teachers'. 2.A (50'x50'x6') reservoir. 3.Construct a (60'x30'x12') RCC teaching building, 2 2-door toilet, 3 blackboards, 20 sets of students' desks and benches and 3 sets of teachers'. 4.Construct a (100'x100'x6') reservoir.		Sustainability	SEAOP-2018-JSGCHT-0059
		Public	Ann, Rakhine State 1.Ye Kaung Chain 2.Pe Dae Kyaw	76,114,691	N/C	1.Construct a (60'x30'x12') RCC teaching building, 2 2-door toilet, 3 blackboards, 20 sets of students' desks and benches and 3 sets of teachers'. 2.Construct a (Φ10', depth 30') well.		Sustainability	SEAOP-2017-JSGCHT-0061
		Public	Ngape, Magway Region 1.Goat Gyi 2.Zin Bynn Min Bu, Magway Region 3.Ao Byin Me	31,534,746	N/C	1.1 Allocate 5 computers . 1.2 Install a Water purifier with 1200L per day and 1 generator. 2.Repairing 288'of 7'brick walls (including 1.5'fundation) 3.A (60'x30'x12') RCC teaching building, 2 2-door toilet, 3 blackboards, 20 sets of students' desks and benches and 3 sets of teachers'.		Sustainability	SEAOP-2018-JSGCHT-0060
		Public	YenaungChaung, Magway Region 1.WatMaSutt 2.NgarlanTer PwinPhyu, Magway Region 3.Kong Su	143,658,281	N/C	1.Construct a (90'x30'x19'6") 2-storey RCC stilted teaching building, 2 2-door toilet, 5 blackboards, 30 sets of students' desks and benches and 5 sets of teachers'. 2.Construct a (90'x30'x12') RCC teaching building, 2 2-door toilet, 5 blackboards, 30 sets of students' desks and benches and 5 sets of teachers'. 3.A (60'x30'x19'6") 2-storey RCC stilted teaching building, 2 2-door toilet, 3 blackboards, 45 sets of students' desks and benches and 3 sets of teachers'.		Sustainability	SEAOP-2017-JSGCHT-0062

No.	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)	Project cost incurred during 2017-2018	Purpose of payment ("Resettlement" or "Sustainability")	Legal/contractual basis of the payment (Ref to the agreement, Act, ..)*
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives..)			
		Public	Zee Bwar, Chauk, Magway Region	42,269,966	N/C	Construct a (90'x30'x12') RCC teaching building, 2 2-door toilet, 5 blackboards, 30 sets of students' desks and benches and 5 sets of teachers'.		Sustainability	SEAOP-2018-JSGCHT-0063
		Public	Kyao Tan, Kyaukypu, Rakhine State	40,715,315	N/C	Repair 4 bridges.		Sustainability	ER00008053
3	Anadaman Transportation Limited(Yangon Branch)(ATL)	N/C	N/C	N/C	N/C	N/C		N/C	N/C
4	Moattama Gas Transportation Co.,Ltd(MGTC)	N/C	N/C	557,210,592	N/C	Management- Staff Costs		N/C	N/C
		N/C	N/C	289,438,542	N/C	KBK OFFICE (General expenses)		N/C	N/C
		N/C	N/C	512,684,623	N/C	Public health		N/C	N/C
		N/C	N/C	282,526,653	N/C	Community development and communication		N/C	N/C
		N/C	N/C	273,112,205	N/C	Education		N/C	N/C
		N/C	N/C	116,755,463	N/C	Agriculture		N/C	N/C
		N/C	N/C	140,442,601	N/C	Veterinary		N/C	N/C
		N/C	N/C	10,497,640	N/C	General Services (Infrastructure)		N/C	N/C
		N/C	N/C	203,373,000	N/C	Tannitharyi Natural Resources		N/C	N/C
		N/C	N/C	302,007,929	N/C	Blindness prevention program in central Myanmar		N/C	N/C
		N/C	N/C	207,458,682	N/C	Yadana Welding Training Program		N/C	N/C
		N/C	N/C	338,962,077	N/C	Road Safety Campaign		N/C	N/C
		N/C	N/C	74,850,755	N/C	YTU Training Programs		N/C	N/C
		N/C	N/C	37,790,418	N/C	Solar Project		N/C	N/C
		N/C	N/C	25,387,125	N/C	Miscellaneous (Project Monitoring, General Support Neighbourhood & HQ Support)		N/C	N/C
5	Tanitharyi Pipeline Company LLC(Myanmar Branch)(TPC)	N/C	N/C	91,053,934	N/C	N/C		N/C	N/C
Total				4,561,083,390					

## Gems and Jade

N°	Company	Beneficiary Identity	Beneficiary Location	Cash Payments Amount (Kyat)			In Kind payments (Projects)		Purpose of payment ("Resettlement" or "Sustainability")	Legal/contractual basis of the payment (Ref to the agreement, Act, ..)*
				Mandatory Social Expenditure	Voluntary Social Expenditure	Date	Description of the projects (activities undertaken, beneficiaries, objectives..)	Project cost incurred during 2017-2018		
74	Northern Jade World	N/C	N/C	-	10,000,000	N/C	N/C	-	-	-
117	Yadanar Si	Sayalay Daw Oattara Wati	Hpakhtant	-	50,000	25/02/2018	for Monastery Building	-	-	-
		Prime Minister of Kachin State	Hpakhtant	-	2,000,000	16/04/2017	fordisplaced refugee medical expense	-	-	-
123	Aung Hlaing Kyawlwa	Post Basic Education Primary School	Marnar village, Mogoke Township	-	2,500,000	Jan, Feb, March, 2017	-	-	-	-
		Monestry	-	-	100,000	June, July, 2017	-	-	-	-
		Festival	-	-	100,000	Oct, Nov, Dec 2017	-	-	-	-
125	Seine Aung	Well	Sin Thay Village, Taung Thar Township	-	6,000,000	December, 2017	-	-	-	-
		Road Construction	Hmaw Wan Lay Village, Phar Kant Township	-	3,000,000	February, 2018	-	-	-	-
		Upper School	Lone Khin Village, Phar Kant Township	-	4,000,000	March, 2018	-	-	-	-
126	Myint Shin Gems Co.,LTd	N/C	N/C	-	3,000,000	N/C	-	-	-	-
159	Myanmar Rich Land Gems	Dama School Donation Cost	Phar Kant	-	100,000	14/06/2017	-	-	-	-
		Winemor Shwe Moe Taung Pagoda Donation to Building	Phar Kant	-	300,000	09/07/2017	-	-	-	-
		Phar Kant Monastery Donation to Building	Phar Kant	-	300,000	09/08/2017	-	-	-	-
		Donation Cost for Yakhine Displaced People	Yakhine	-	1,000,000	03/09/2017	-	-	-	-
		Funds for Regional Development	Phar Kant	-	2,000,000	14/09/2017	-	-	-	-
		Nan Paphit Village Regional Development	Phar Kant	-	400,000	09/10/2017	-	-	-	-

N°	Company	Beneficiary Identity	Beneficiary Location	Cash Payments Amount (Kyat)			In Kind payments (Projects)		Purpose of payment ("Resettlement" or "Sustainability")	Legal/contractual basis of the payment (Ref to the agreement, Act, ..)*
				Mandatory Social Expenditure	Voluntary Social Expenditure	Date	Description of the projects (activities undertaken, beneficiaries, objectives..)	Project cost incurred during 2017-2018		
		Funds for Regional Development	Phar Kant	-	2,000,000	15/10/2017		-	-	-
		Donation Cost for Nursing Home	Phar Kant	-	100,000	22/10/2017		-	-	-
		Donation for Lisu Centenary Dama talk	Phar Kant	-	500,000	27/11/2017		-	-	-
		Fundst for Yakhine Rehabilitation	Yakhine	-	2,000,000	31/12/2017		-	-	-
		Funds for Nan Paphit Village Fire Station	Phar Kant	-	200,000	31/12/2017		-	-	-
		Funds for Regional Development	Phar Kant	-	3,000,000	13/01/2018		-	-	-
		Donation to Building Phar Kant Backup Fire Station	Phar Kant	-	1,000,000	13/03/2018		-	-	-
161	Kan Sein Pwint	Kachin Traditional Festival	Myitkyina Township, Kachin	-	2,000,000	01/01/2018		-	-	-
172	Moe Brothers	Electrical Power	Htee Tin Taung Village	-	65,000,000	2017-2018		-	-	-
		Road Construction	Nga Pyin Inn Village - Htee Tin Taung Village	-	80,000,000	2017-2018		-	-	-
		Lake	Yae Shin Village	-	20,000,000	2017-2018		-	-	-
		Pipeline for Lake	Yae Myat village	-	15,000,000	2017-2018		-	-	-
		Electrical Power	Yae Shinn Village	-	30,000,000	2017-2018		-	-	-
		Electrical Power	Nga Pyin Inn Village	-	30,000,000	2017-2018		-	-	-
		Teaching Aids for Padathar	Yae Myat, Nga Pyin Inn, Yae Shin, Htee Tin Taung Villages	-	10,000,000	2017-2018		-	-	-
		Annual Religious Donation	Yae Myat, Nga Pyin Inn, Yae Shin, Htee Tin Taung Villages	-	13,000,000	2017-2018		-	-	-
189	MOGOK PRIDE	Koe Lan Village Road	Koe Lan Village, Mogok City, Mandalay Division	-	10,000,000	10/04/2017	Stones, sands/ Backhoe work	15,000,000	-	-
		Koe Lan Village Electricity	Koe Lan Village, Mogok	-	25,700,000	03/05/2017		-	-	-

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N°	Company	Beneficiary Identity	Beneficiary Location	Cash Payments Amount (Kyat)			In Kind payments (Projects)		Purpose of payment ("Resettlement" or "Sustainability")	Legal/contractual basis of the payment (Ref to the agreement, Act, ..)*
				Mandatory Social Expenditure	Voluntary Social Expenditure	Date	Description of the projects (activities undertaken, beneficiaries, objectives..)	Project cost incurred during 2017-2018		
195	Myanmar Lar Ba Gems Co., Ltd.	Cleaning the sands,muds from downtown stream	City,Mandalay Division Mogok City,Mandalay Division	-	1,500,000	15/08/2017		-	-	-
		Local communities	Mogok Township	-	250,000	08/05/2017	Donation for development of Red Cross Society at Mogok Township	-	-	-
		Local communities	Sin Khwar and Kyauk Phar Village (Mogok Township)	-	320,000	03/02/2018	Donation for reconstruction project of Sin Khwar-Kyauk Phar Road (Mogok Township)	-	-	-
196	METAL METERO	No(56)Basic Education School	No(56)Basic Education School	-	200,000	23/01/2018		-	-	-
		King West Village Road	King West Village Road	-	1,000,000	26/01/2018		-	-	-
		The Four face pagoda Donation	The Four face pagoda Donation	-	500,000	08/03/2018		-	-	-
		King East Village Road	King East Village Road	-	0	28/01/2018	Disel - (2)Drum	-	-	-
		King Village Social Donation (Funeral)	King Village Social Donation (Funeral)	-	200,000	28/01/2018		-	-	-
		King Village Social Donation	King Village Social Donation	-	1,000,000	18/03/2018		-	-	-
201	KYAN FAMILY	Locals	Thaketa Village Tract	-	1,000,000	16/9/2017		-	-	-
				-	500,000	01/08/2018		-	-	-
202	HTAY PAING	Mogoke West Hospital	Mogoke (West), Mandalay	-	20,000,000	2018	Road Construction for Hospitals	-	-	-
		Balt Lone Gyi Primary School	Mogoke (West), Mandalay	-	10,000,000	2018	-	-	-	-

## Other Minerals

No.	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)	Project cost incurred during 2017-2018	Project cost incurred during 2017-2018 (Kyat)
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives..)		
1	NATIONAL PROSPERITY COMPANY LIMITED	1	Yamethin Township	20,000,000	12/5/2016 23/6/2016 31/3/2017	Donation 20 houses ,Rehabilitaion For Fire Refugee	N/C	N/C
		2	NayPyiTaw	2,001,758,460	31/08/2016	Donation Amber Stone to , Myanmar Gem Museum , NayPyiTaw	N/C	N/C
		3	Yangon	5,000,000	02/02/2017	N/C	Donation to Gem Training School	
		4	Yangon	933,236,873	2016-2017	Donation Mahathada High Shool Building	N/C	N/C
		5	Mandalay	30,000,000	15/12/2016 26/12/2016	N/C	Donation to Mandalay Mahawthahtar School Donation	
		6	Yamethin Township	6,604,640	30/04/2016	Donation Li Pan Kyan Bridge Construction	N/C	N/C
		7	Yamethin Township	5,841,920	30/04/2016	Donation Pha Lin Kyan Bridge Construction	N/C	N/C
		8	Yamethin Township	11,401,600	30/04/2016	Donation MayTonRoe Bridge Construction	N/C	N/C
		9	Yamethin Township	7,200,000	04/09/2016	N/C	Donation for Outstanding Students Awarding Ceremony & Others Donations	N/C
		10	Yamethin Township	101,494,315	2016-2017	N/C	Donation Repair& Main; (Road)& Monastery Donations	N/C
		11	Yangon	34,442,050	2016-2017	N/C	Donation for Buddhist Culture ( Htein Taw )	N/C
3	GEO ASIA INDUSTRY & MINING COMPANY LIMITED	Dragon Temple	Shwe Min Bon	157,062,500	2017-2018	N/C	N/C	N/C
		School	Shwe Min Bon	38,944,390	2017-2018	N/C	N/C	N/C
		Road	Shwe Min Phone - Nyaung Kone (6) Miles	60,000,000	N/C	N/C	N/C	N/C
		Road	Nyaung Kone - Nga Pagoda (6) miles	60,000,000	N/C	N/C	N/C	N/C
		Road	Tailoring - 7 miles	70,000,000	N/C	N/C	N/C	N/C
		Education	Kalaw Township Education Fund	10,000,000	2017-2018	N/C	N/C	N/C
		Monastery Donation	Shwe Min Bon	20,000,000	2017-2018	N/C	N/C	N/C
5	ETERNAL MINING COMPANY LIMITED	Public	Colin! Go round, I have no idea. The men of the city!	236,614,975	N/C	N/C	N/C	N/C

				Cash Payments		In Kind payments (Projects)		
No.	Company	Beneficiary Identity	Beneficiary Location	Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives..)	Project cost incurred during 2017-2018	Project cost incurred during 2017-2018 (Kyat)
6	MYANMA ECONOMIC HOLDINGS PUBLIC COMPANY LIMITED	N/C	N/C	27,350,000	N/C	N/C	N/C	N/C
9	GPS JOINT VENTURE COMPANY LIMITED	Collective	Bawsaing Region	N/C	31/03/2018			
11	DELCO LIMITED	Donation for Water Festival & for Buddish related festivals, etc..	Kanbauk mining, Kanbauk, Yaybyu Tsp, Dawei District, Tanintharyi Division.	3,420,000	April, 2017	N/C	N/C	N/C
		paving the concreted roads, etc...	Kanbauk mining, Kanbauk, Yaybyu Tsp, Dawei District, Tanintharyi Division.	3,155,000	May, 2018	N/C	N/C	N/C
		Donation to the orphans in Irrewaddy Region, etc..	Kanbauk mining, Kanbauk, Yaybyu Tsp, Dawei District, Tanintharyi Division.	2,841,500	June, 2018	N/C	N/C	N/C
		Made some donation for Martyrs's Day celebration & Football Club in Kanbauk Village, etc..	Kanbauk mining, Kanbauk, Yaybyu Tsp, Dawei District, Tanintharyi Division.	3,125,000	July, 2018	N/C	N/C	N/C
		Donation for public health process in Tanintharyi Region & some medical treatment tools to Kanbauk Village's Hospital, etc...	Kanbauk mining, Kanbauk, Yaybyu Tsp, Dawei District, Tanintharyi Division.	23,071,000	August, 2018	N/C	N/C	N/C
		some donations to Monestary in Myetta Township, Tanintharyi Region & to Police Station in Kanbauk Village, etc...	Kanbauk mining, Kanbauk, Yaybyu Tsp, Dawei District, Tanintharyi Division.	1,500,000	September, 2018	N/C	N/C	N/C
		Donated for paving concreted road for Shwe Si Ti Monestary, etc..	Kanbauk mining, Kanbauk, Yaybyu Tsp, Dawei District, Tanintharyi Division.	2,330,000	October, 2018	N/C	N/C	N/C
	Donated for Paving Concreted Road & Renovation for existing bridge in the areas of Te Pong Si Di, etc...	Kanbauk mining, Kanbauk, Yaybyu Tsp, Dawei District, Tanintharyi Division.	214,500	November, 2018	N/C	N/C	N/C	
12	MAX (MYANMAR) COMPANY LIMITED	Stipend for Student	N/C	10,480,000	30/06/2017	N/C	N/C	N/C
		Stipend for Student	N/C	680,000	30/06/2017	N/C	N/C	N/C
		Stipend for Student	N/C	740,000	30/06/2017	N/C	N/C	N/C



No.	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)		Project cost incurred during 2017-2018 (Kyat)
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives..)	Project cost incurred during 2017-2018	
15	WIN MYINT MO INDUSTRIES COMPANY LIMITED	Khatain Donation	Thae Phyu Station	50,000	31/10/2017	N/C	N/C	N/C
		Middle School Building	Aung Silar Village	100,000	19/12/2017	N/C	N/C	N/C
		Dahama School Donation	Aung Nan Cho Village	500,000	11/01/2019	N/C	N/C	N/C
		Chrismax Day	Aung Nan Cho Village	100,000	01/05/2017	N/C	N/C	N/C
		Aung Nan Cho Village for Middle School Award	Aung Nan Cho Village	100,000	16/01/2018	N/C	N/C	N/C
		Aung Nan Cho Village for Middle School Award	Aung Nan Cho Village	246,000	18/01/2018	N/C	N/C	N/C
		Aung Si Lar Village for Middle School Award	Aung Silar Village	100,000	29/01/2018	N/C	N/C	N/C
		Natural Disasters in Kalay District , Sagaing Division	Sagaing Division, Kalay District	10,000,000	24/09/2017	N/C	N/C	N/C
		Public	North Shan State Namtu	9,404,229	N/C	Nan Ma La Flue Line	N/C	N/C
		Public	North Shan State Namtu	2,407,528	N/C	Underground Tube Well	N/C	N/C
17	MYANMAR PONGPIPAT COMPANY LIMITED	Public	North Shan State Namtu	6,057,560	N/C	Electricity Donation for School & Seminary	N/C	N/C
		Public	North Shan State Namtu	28,691,930	N/C	Miscellaneous Donation	N/C	N/C
		School Roof installation	Yaybuwa, Heinda Tract, Dawei	400,000	16/08/2017	N/C	N/C	N/C
		Primary School (Ceilling Installation)	Heinda Village, Dawei	700,000	12/04/2017	N/C	N/C	N/C
20	HTOO INTERNATIONAL INDUSTRY GROUP COMPANY LIMITED	Tanintharyi Government	Dawei, Tanintharyi Region	20,000,000	24/12/2017	N/C	N/C	N/C
		2018 Independent Day Sport Game	Heinda Village, Dawei	400,000	27/12/2017	N/C	N/C	N/C
21	HARBOR STAR MINING COMPANY LIMITED	N/C	N/C	6,658,500	N/C	N/C	N/C	N/C
		Temple	YwarNgan Township	100,000	03/01/1900	N/C	N/C	N/C
		Village	YwarNgan Township	1,000,000	10/01/1900	N/C	N/C	N/C
		Village	YwarNgan Township	2,800,000	10/01/1900	N/C	N/C	N/C
		Temple	YwarNgan Township	4,500,000	10/01/1900	N/C	N/C	N/C
		Village	YwarNgan Township	8,000,000	11/01/1900	N/C	N/C	N/C

No.	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)		Project cost incurred during 2017-2018 (Kyat)
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives..)	Project cost incurred during 2017-2018	
23	MYANMAR GOLDEN POINT FAMILY CO., LTD.	Public	Phayaung Taung	1,163,913,675	N/C	N/C	N/C	N/C
		N/C	Thabeikkyin	N/C	N/C	N/C	N/C	N/C
24	THAN TAW MYAT COMPANY LIMITED	N/C	Kyautsae Township	94,775,000	28/06/2017	N/C	N/C	N/C
31	HEAY HEIN COMPANY LIMITED	N/C	N/C	6,300,000	N/C	N/C	N/C	N/C
32	NGWE KABAR MYANMAR COMPANY LIMITED	Villagers	Yamon Village	N/C	N/C	N/C	N/C	N/C
			Donated by Pagoda Building	34,435,000	2017-2018 Period	N/C	N/C	N/C
			Near Work-Site Area Villages	24,027,500	2017-2018 Period	N/C	N/C	N/C
38	MYAY NAGAR MINING COMPANY LIMITED	VILLAGRER	NAUNG LWAE VILLAGE	2,000,000	3.5.2017	N/C	N/C	N/C
		VILLAGRER	BAW SAING VILLAGE	1,000,000	5.1.2018	N/C	N/C	N/C
41	MYANMAR TIN - TUNGSTEN COMPANY LIMITED	Theindaw High School	Theindaw Min Village, Tanitharyi	3,500,000	2.10.2017	N/C	N/C	N/C
		Road Construction	Theindaw Min Village, Tanitharyi	2,500,000	15.12.2017	N/C	N/C	N/C
42	Myanmar Yang Tse Copper Ltd	Kangon Village	Kysisintaung in Saligy Township and Yinmabin Towship	10,326,684	15/08/2017	Construct School Fencing		N/C
		N/C		36,021,448	27/07/2017	Extend Mahar Bawdi Monastery Building		N/C
		Dondaw Village		17,403,013	23/01/2018	Electricity Extension		N/C
		N/C		17,403,013	16/02/2018	Electricity Extension		N/C
		N/C		1,328,704	08/04/2017	To Extend Water Pipelines		N/C
		Wadan Village		43,955,425	15/08/2017	Connect Water Tower, Pump and Tank with Water Pipes		N/C
		N/C		43,955,425	23/01/2018	Connect Water Tower, Pump and Tank with Water Pipes		N/C
		Tebinkan Village		33,750,000	05/06/2017	Reservoir Construction		N/C
		N/C		73,125,000	07/08/2017	Reservoir Construction		N/C
		N/C		13,000,000	23/08/2017	Water pipeline installation		N/C
		N/C		23,500,000	27/06/2017	Road & Bridge Construction over brook between Htandawgyi and Yegybin		N/C
		Yegybin Village		15,238,095	11-7-17/ 13-9-17/ 25-9-17	Donate Ambulance for Social Team		N/C
		N/C		625,000	10/11/2017	Ambulance Lighting		N/C

No.	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)		Project cost incurred during 2017-2018 (Kyat)
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives..)	Project cost incurred during 2017-2018	
		N/C		1,332,771	18/08/2017	Request Machines to repair dam of New Shwepankhine		N/C
		Ywatha Village		32,393,119	18/08/2017	Extend School and donate furniture construct Teacher's Rest Room		N/C
		N/C		825,000	26/05/2017	Cement for Chan Thar Aye Monastery		N/C
		Gondaw		17,117,228	05/09/2017	Construct Embankment along Yama Stream		N/C
		Thaedawgyi		24,573,760	08/08/2017	Computers & Building for computers & Cupboard for E-Library		N/C
		Mine Town		2,263,474	13/06/2016	Water pipeline for Head Monastery		N/C
		N/C		11,054,000	27/06/2017	Complete School Hall for BEHS School		N/C
		N/C		1,160,000	27/06/2017	Kindergarten Sports Equipment		N/C
		Myayake		15,238,095	11-7-17/ 13-9-17/ 25-9-17	Ambulance Vehicle		N/C
		N/C		625,000	10/11/2017	Ambulance Lighting		N/C
		Myasane		6,635,852	01/06/2017	Construct Preliminary School Fence with Electricity		N/C
		Kyeethakya		9,790,100	07/08/2017	Drinking Water purifier & well		N/C
		Kyaukmyet		20,102,041	25-8-17/ 21-9-17/ 16-10-17	Car for Fire - 2,000 gal.		N/C
		Htanaunggon		6,216,435	31/03/2017	150 KVA Trasformer (only)		N/C
		Ayegone		5,087,466	22/05/2017	Fence for School		N/C
		Banenwechaung		15,238,095	11-7-17/ 13-9-17/ 25-9-17	Ambulance Vehicle		N/C
		N/C		625,000	N/C	Ambulance Lighting		N/C
		All Village		96,100,000	07/12/2017	Scholarships		N/C
		Kangon Hospital		34,093,800	07/12/2017	Mobile Medical		N/C
43	Eden Energy & Natural Resources Development Co., Ltd	Sourthen Part Village Hall	Tekyit Village	13,239,445	09/2017 To 02/2018	N/C	N/C	N/C
		Concrete Lamp Pose (7M)(25)Nos	Taung Pot Hla Village	2,125,000	30/05/2017	N/C	N/C	N/C
		Construction, Repair, Donation	Tekyit Village	2,325,450	06/2017 To 09/2018	N/C	N/C	N/C
		Lake	Tekyit Village Hospital	2,822,000	15/06/2017	N/C	N/C	N/C
		Repair & Donation	Tekyit Village	3,041,950	06/2017 To 07/2017	N/C	N/C	N/C

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				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives..)	Project cost incurred during 2017-2018	
45	MYANMAR WANBAO MINING COPPER LTD	Road Construction	Min Village	1,544,450	01/01/2017	N/C	N/C	N/C
		Donation for Refugees Camp	Rakhine	200,000	08/09/2017	N/C	N/C	N/C
		Moe Kyoe Pyin(N) village		18,960,000	05.04.2017	Well & Repair hoses construction	N/C	N/C
		Kyaw Ywar Mingalar kone		27,319,000	05.04.2017	Well & Repair hoses construction	N/C	N/C
		Kyaut Phyu Tie village		26,000,000	05.04.2017	Electrical & Road etc	N/C	N/C
		Ywar Shay village		46,845,000	11.04.2017	Road construction	N/C	N/C
		Myay pyin thar		12,261,303	11.04.2017	Dining room construction	N/C	N/C
		Thar Yar Kone village		5,538,041	11.04.2017	Car garage & office construction	N/C	N/C
		Taw Kyaung village		13,150,000	12.04.2017	Healthy dispensary construction	N/C	N/C
		Phuang Kar (N)Village		21,100,000	26.04.2017	Repair Lake & New lake	N/C	N/C
		Taw Kyaung village		35,840,000	30.04.2017	Build & buy land construction	N/C	N/C
		A Lal ywar village		35,840,000	08.05.2017	Build construction	N/C	N/C
		Moe Kyoe Pyins) village		51,155,000	08.05.2017	Pave & Build construction	N/C	N/C
		Shwe Hlay village		50,452,000	08.05.2017	Build construction	N/C	N/C
		Lae Ti village		5,070,000	08.05.2017	Buy communal accessories	N/C	N/C
		A Lal Taw village		41,704,000	09.05.2017	Build construction & Lake	N/C	N/C
		Tone Ywar Ma village		30,144,000	09.05.2017	well & Build construction	N/C	N/C
		Htan Taw Village		28,897,000	09.05.2017	Buy communal car & Built construction	N/C	N/C
		Let pa tuang /Ma Soe Yein village		12,343,000	09.05.2017	Street construction	N/C	N/C
		Sae Tae village		38,400,000	09.05.2017	buy land construction	N/C	N/C
		Taung pa lu village		22,022,000	09.05.2017	Buy communal car & Built construction	N/C	N/C
		Phuang Kar (s)Village		37,755,708	09.05.2017	Build transformer	N/C	N/C
		Tone Ywar Thit Village		11,200,000	09.05.2017	Build construction	N/C	N/C
		Phaung Kar (M)Village		12,345,600	09.05.2017	Build construction & Build septic	N/C	N/C
		A Lal ywar village		10,254,000	06.06.2017	build street construction	N/C	N/C
		Pa laung village		18,048,000	31.05.2017	electric construction	N/C	N/C

No.	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)		Project cost incurred during 2017-2018 (Kyat)
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives..)	Project cost incurred during 2017-2018	
			Ku Toe Kone village	10,650,000	19.06.2017	school construction	N/C	N/C
			CSD Grants and Pensions	142,766,500	12.08.2017	CSD Grants and pensions	N/C	N/C
			Nyaung Pin Gyi village	29,230,000	10.10.2017	Electrical project	N/C	N/C
			Ma Gyi Tan village	8,080,000	08.09.2017	Electrical construction	N/C	N/C
			Kan Taw New village	31,584,000	07.08.2017	Ditch construction	N/C	N/C
			Ywar Shay village	32,100,000	31.03.2018	Ywar Shay Village	N/C	N/C
47	MYANMAR CNMC NICKEL COMPANY LIMITED	N/C	Sagaing Division Htee Htoo Township and Mandalay Division. Thanlyin Township Local and organizations in Taung sub-township	298,445,270	2017-2018	Sagaing Division Htee Htoo Township and Mandalay Division. Thanlyin Township Taung sub-township	N/C	N/C
51	BLUE DIAMOND CEMENT COMPANY LIMITED	N/C	N/C	14,740,000	N/C	N/C	N/C	N/C
52	DAGON MINING COMPANY LIMITED	N/C	N/C	N/C	N/C	N/C	N/C	N/C
57	GROUP OF FOUR MINING COMPANY LIMITED	N/C	N/C	6,250,000	N/C	N/C	N/C	N/C
61	LOI CHAI NAGAR MINING COMPANY LIMITED	Nang Lin Monastery	Nar Mhan Vilage, Lai Char Township, Sourthern Shan State	10,000,000	N/C	N/C	N/C	N/C
66	MYANMAR NAING GROUP MINING COMPANY LTD	N/C	N/C	12,000,000	N/C	N/C	N/C	N/C
71	SHWE PIN LE MINING & INDUSTRY COMPANY LIMITED	Bridge	Thazin Village	7,170,000	02/01/2018	N/C	N/C	N/C
75	TRIPLE "A" CEMENT INTERNATIONAL COMPANY LIMITED	N/C	N/C	67,480,600	N/C	N/C	N/C	N/C
84	SEIN CHI LIN MINING CO., LTD.	Olders Offering Ceremony	Mabaekhone Vilage, Minbu Township, Magway Region	650,000	25/10/2017	N/C	N/C	N/C
		Monastery Education School	Padan Township,Mgaway Region	500,000	10/04/2017	N/C	N/C	N/C
		Monastery Education School	Padan Township,Mgaway Region	500,000	11/02/2018	N/C	N/C	N/C
		Dhamatheingi Dhama Station	Shwechaung Village,Minibu township, Magway Region	30,000,000	10/07/1905	N/C	N/C	N/C
		Bridge construction	Shwechaung Village,Minibu township, Magway Region	1,500,000	10/07/1905	N/C	N/C	N/C
92	NAN KANAUNG MINING &	N/C	N/C	3,000,000	N/C	N/C	N/C	N/C

No.	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)		Project cost incurred during 2017-2018 (Kyat)
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives..)	Project cost incurred during 2017-2018	
	ENGINEERING COMPANY LIMITED							
	Total			7,297,967,003				

Pearl

No	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)	Project cost incurred during 2017-2018	Project cost incurred during 2017-2018 (Kyat)
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives..)		
1	Myanmar Tasaki Co., Ltd	Scholarship Student (6 Person) for Dec 2017, Jan & Feb 2018	Tanintharyi Region (Myeik & Kyunsu Tsp.)	3,564,000	12/02/2018	N/C	N/C	N/C
		Scholarship Student (6 Person)	Tanintharyi Region (Myeik & Kyunsu Tsp.)	1,189,800	05/03/2018	N/C	N/C	N/C
2	Myanmar Atlantic Co., Ltd	Village teacher (for 5 teachers)	Done Za Latt Village, Done Nyaung Hmainn Village, Done Palae Aww Village, Done Oo Yin Kan Village	6,660,000	April'17 to Mar'18	Salary sponsorship for local teachers in four primary schools and one middle school	N/C	N/C
		Villagers	Done Nyaung Hmainn, Done Za Latt Village	1,440,000	April'17 to Mar'19	Monthly medical cover in two villages	N/C	N/C
		Company's staff	N/C	750,080	25.4.2017, 31.5.2017, 9.1.2018	Health cured for company's staff (for operation waist, stomach disease)	N/C	N/C
		Villagers	Linn Loom village, Don Nyaun Hmainn village, Pa Anw Wa village, Don Pearl Village ( Sa Lon Kong ), Don Pearl Aww Village, Don Zalatt Village	2,012,000	27.6.2017, 8.3.2018, 12.3.2018	Solar bulb donation	N/C	N/C
		Myanmar Pearl Enterprise, Myeik University, Navy General Headquarters	NayPyiTaw, Myeik, Tanintaryi Region	1,389,000	23/08/2017	Donation of Automatic Weather Observation Station and Laptop	N/C	N/C
		Marine Science Student	Myeik	1,200,000	Dec'17 to Mar'18	Scholarship for two Marine Science Student	N/C	N/C
		Distance Students	Company, Done Zalatt Village	600,000	20/09/2017	Scholarship for 5 staff of company and 1 teacher of Done Zalatt Village	N/C	N/C
		Students	NayPyiTaw, Done Palae Aww, Done Za Latt Villages	450,000	18/07/2017, 19/01/2018, 29/01/2018	Donation for education award ceremony of village primary school and children of MPE staff (NPW)	N/C	N/C

No	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)	Project cost incurred during 2017-2018	Project cost incurred during 2017-2018 (Kyat)
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives..)		
3	Myanmar Andman Co., Ltd	Village Students	Done Za Latt Village	1,780,391	30/06/2017	Primary school repaired charges	N/C	N/C
		Students	Done Za Latt Village, Done Nyaung Hmainn Village, Done Palae Aww Village, Done Oo Yin Kan Village, Pa Yaw War Village, Myeik MPE, Naypyitaw MPE, Palae Kyun, Tanintaryi Navy Base	2,700,000	30/06/2017	Books and stationery donation for village school	N/C	N/C
		Kyun Su Township	Kyun Su Township	100,000	02/01/2018	Donation for "Independence Day" of Kyun Su Township	N/C	N/C
		Myeik University Students	Myeik	213,250	26/01/2018	Pearl and knowledge talk show at Myeik University	N/C	N/C
		Myeik University	Myeik	300,000	26/01/2018	Donation for chapel construction of Myk university	N/C	N/C
		Kaut Thaung District	Kaut Thaung	100,000	12/03/2018	Donation for Travel & Investment Festival at Kaut Thaung	N/C	N/C
			St.Luke's Island, Tanintharyi Division	445,500,000	N/C	For Worship Stupa	Yes	N/C
			Insein Township	82,000,000	N/C	Donation to Aung San Monestary	Yes	N/C
			Naypyitaw	30,000,000	N/C	Donation for Yan Aung Myin Pagoda Renovation	Yes	N/C
4	Belpearl Myanmar Co., Ltd	Home of Age	Zar Det Gyi Island	2,500,000	02/06/2017	N/C	N/C	N/C
		Basic Education High School	Zar Det Gyi Island	N/C	N/C	500 dozens of Exercise Books@2,600MMK/Doz	1,300,000	N/C
		Basic Education High School	Pearl Island	N/C	N/C	500 dozens of Exercise Books@2,600MMK/Doz	1,300,000	N/C
5	Nino Pearl Culturing Co., Ltd	Ma Thin Thin Kyu	Myitkyina	200,000	06/04/2017	Payment for Attending for University	N/C	N/C



No	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)	Project cost incurred during 2017-2018	Project cost incurred during 2017-2018 (Kyat)
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives..)		
		Pa La Ka (Clinic)	Pa La Ka Island	180,000	11/04/2017	Donation to PaLaKa Clinic	N/C	N/C
		Ma Thin Thin Kyu	Myitkyina	100,000	12/05/2017	Payment for Attending for University	N/C	N/C
		Ma Jar Phan, Mg Myo Sut Jat Naw	Myitkyina	100,000	12/05/2017	Payment for Attending for University	N/C	N/C
		Ma Hwan Lin Oo	Myitkyina	100,000	18/05/2017	Payment for Attending for University	N/C	N/C
		Ma Sai Jar Sue Pan	Myitkyina	150,000	18/05/2017	Payment for Attending for University	N/C	N/C
		Pa La Ka (Clinic)	Pa La Ka Island	180,000	18/05/2017	Donation to PaLaKa Clinic	N/C	N/C
		Ma Hwan Lin Oo	Myitkyina	50,000	07/06/2017	Payment for Attending for University	N/C	N/C
		Ma Thin Thin Kyu	Myitkyina	100,000	07/06/2017	Payment for Attending for University	N/C	N/C
		Ma Jar Phan, Mg Myo Sut Jat Naw	Myitkyina	100,000	07/06/2017	Payment for Attending for University	N/C	N/C
		Ma Sai Jar Sue Pan	Myitkyina	50,000	07/06/2017	Payment for Attending for University	N/C	N/C
		Pa La Ka (Clinic)	Pa La Ka Island	180,000	09/06/2017	Donation to PaLaKa Clinic	N/C	N/C
		Ma Jar Phan, Mg Myo Sut Jat Naw	Myitkyina	100,000	06/07/2017	Payment for Attending for University	N/C	N/C
		Ma Thin Thin Kyu	Myitkyina	100,000	06/07/2017	Payment for Attending for University	N/C	N/C

No	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)	Project cost incurred during 2017-2018	Project cost incurred during 2017-2018 (Kyat)
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives..)		
		Ma Hwan Lin Oo	Myitkyina	50,000	06/07/2017	Payment for Attending for University	N/C	N/C
		Pa La Ka (Clinic)	Pa La Ka Island	180,000	12/07/2017	Donation to PaLaKa Clinic	N/C	N/C
		MPE Students	Naypyitaw	300,000	21/07/2017	Donation to MPE Students	N/C	N/C
		Ma Hwan Lin Oo	Myitkyina	50,000	31/07/2017	Payment for Attending for University	N/C	N/C
		Ma Thin Thin Kyu	Myitkyina	100,000	31/07/2017	Payment for Attending for University	N/C	N/C
		Ma Sai Jar Sue Pan	Myitkyina	100,000	31/07/2017	Payment for Attending for University	N/C	N/C
		Ma Jar Phan, Mg Myo Sut Jat Naw	Myitkyina	100,000	31/07/2017	Payment for Attending for University	N/C	N/C
		Pa La Ka (Clinic)	Pa La Ka Island	180,000	14/08/2017	Donation to PaLaKa Clinic	N/C	N/C
		Pa La Ka	Pa La Ka Island	972,650	27/08/2017	Donation for renovation navy's building	N/C	N/C
		Ma Hwan Lin Oo	Myitkyina	50,000	31/08/2017	Payment for Attending for University	N/C	N/C
		Ma Thin Thin Kyu	Myitkyina	100,000	31/08/2017	Payment for Attending for University	N/C	N/C
		Ma Sai Jar Sue Pan	Myitkyina	50,000	31/08/2017	Payment for Attending for University	N/C	N/C
		Ma Jar Phan, Mg Myo Sut Jat Naw	Myitkyina	100,000	31/08/2017	Payment for Attending for University	N/C	N/C
		Public	Rakhine State	600,000	04/09/2017	Donation to public from Rakhine State	N/C	N/C

No	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)	Project cost incurred during 2017-2018	Project cost incurred during 2017-2018 (Kyat)
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives..)		
		Ma May Zin Oo	Phyu	50,000	06/09/2017	Payment for Attending for High School	N/C	N/C
		Public	Rakhine State	1,000,000	07/09/2017	Donation to public from Rakhine State	N/C	N/C
		Pa La Ka (Clinic)	Pa La Ka Island	180,000	29/09/2017	Donation to PaLaKa Clinic	N/C	N/C
		Pa La Ka	Pa La Ka Island	178,500	11/10/2017	Donation for renovation navy's building	N/C	N/C
		Pa La Ka (Clinic)	Pa La Ka Island	180,000	31/10/2017	Donation to PaLaKa Clinic	N/C	N/C
		Ma Hwan Lin Oo	Myitkyina	50,000	06/11/2017	Payment for Attending for University	N/C	N/C
		Ma May Zin Oo	Phyu	50,000	06/11/2017	Payment for Attending for High School	N/C	N/C
		Ma Jar Phan, Mg Myo Sut Jat Naw	Myitkyina	100,000	06/11/2017	Payment for Attending for University	N/C	N/C
		Ma Thin Thin Kyu	Myitkyina	100,000	06/11/2017	Payment for Attending for University	N/C	N/C
		Ma Sai Jar Sue Pan	Myitkyina	50,000	06/11/2017	Payment for Attending for University	N/C	N/C
		Pa La Ka (Clinic)	Pa La Ka Island	180,000	18/11/2017	Donation to PaLaKa Clinic	N/C	N/C
		Pa La Ka (Clinic)	Pa La Ka Island	180,000	30/11/2017	Donation to PaLaKa Clinic	N/C	N/C
		Ma Thin Thin Kyu	Myitkyina	100,000	04/12/2017	Payment for Attending for University	N/C	N/C
		Ma Jar Phan, Mg Myo Sut Jat Naw	Myitkyina	100,000	04/12/2017	Payment for Attending for University	N/C	N/C

No	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)	Project cost incurred during 2017-2018	Project cost incurred during 2017-2018 (Kyat)
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives..)		
		Ma May Zin Oo	Phyu	50,000	04/12/2017	Payment for Attending for High School	N/C	N/C
		Ma Sai Jar Sue Pan	Myitkyina	50,000	04/12/2017	Payment for Attending for University	N/C	N/C
		Ma Hwan Lin Oo	Myitkyina	50,000	04/12/2017	Payment for Attending for University	N/C	N/C
		Ma Hwan Lin Oo	Myitkyina	50,000	29/12/2017	Payment for Attending for University	N/C	N/C
		Ma Thin Thin Kyu	Myitkyina	100,000	29/12/2017	Payment for Attending for University	N/C	N/C
		Ma Jar Phan, Mg Myo Sut Jat Naw	Myitkyina	100,000	29/12/2017	Payment for Attending for University	N/C	N/C
		Ma Sai Jar Sue Pan	Myitkyina	50,000	29/12/2017	Payment for Attending for University	N/C	N/C
		Ma May Zin Oo	Phyu	50,000	29/12/2017	Payment for Attending for High School	N/C	N/C
		Pa La Ka (Clinic)	Pa La Ka Island	180,000	29/12/2017	Donation to PaLaKa Clinic	N/C	N/C
		Pa La Ka (Clinic)	Pa La Ka Island	180,000	15/01/2018	Donation to PaLaKa Clinic	N/C	N/C
		Pa La Ka (Clinic)	Pa La Ka Island	180,000	31/01/2018	Donation to PaLaKa Clinic	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	1,860,000	03/02/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	150,000	03/02/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	40,000	03/02/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	2,000,000	06/02/2018	Donation to PaLaKa School	N/C	N/C

No	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)	Project cost incurred during 2017-2018	Project cost incurred during 2017-2018 (Kyat)
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives..)		
		Pa La Ka (School)	Pa La Ka Island	30,000	08/02/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	61,200	15/02/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	975,000	17/02/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	31,000	28/02/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	31,000	28/02/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	45,000	28/02/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	50,000	28/02/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	10,000	28/02/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	863,250	28/02/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	160,000	28/02/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	310,000	28/02/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	10,000	28/02/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	1,086,400	28/02/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	140,000	28/02/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	10,000	28/02/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (Clinic)	Pa La Ka Island	180,000	28/02/2018	Donation to PaLaKa Clinic	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	22,800	01/03/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	63,000	01/03/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	51,900	01/03/2018	Donation to PaLaKa School	N/C	N/C

No	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)	Project cost incurred during 2017-2018	Project cost incurred during 2017-2018 (Kyat)
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives..)		
		Pa La Ka (School)	Pa La Ka Island	2,000,000	05/03/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	574,000	05/03/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (Clinic)	Pa La Ka Island	180,000	06/03/2018	Donation to PaLaKa Clinic	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	23,000	07/03/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	862,300	22/03/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	11,000	22/03/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	1,457,000	22/03/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	17,000	22/03/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	10,560	22/03/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	57,000	22/03/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	2,000,000	22/03/2018	Donation to PaLaKa School	N/C	N/C
		Pa La Ka (School)	Pa La Ka Island	150,000	24/03/2018	Donation to PaLaKa School	N/C	N/C
		Ma Thin Thin Kyu	Myitkyina	100,000	30/03/2018	Payment for Attending for University	N/C	N/C
		Ma Sai Jar Sue Pan	Myitkyina	50,000	30/03/2018	Payment for Attending for University	N/C	N/C
		Ma Jar Phan, Mg Myo Sut Jat Naw	Myitkyina	100,000	30/03/2018	Payment for Attending for University	N/C	N/C
		Ma May Yee Mon	Yangon	100,000	30/03/2018	Payment for Attending for University	N/C	N/C

No	Company	Beneficiary Identity	Beneficiary Location	Cash Payments		In Kind payments (Projects)	Project cost incurred during 2017-2018	Project cost incurred during 2017-2018 (Kyat)
				Amount (Kyat)	Date	Description of the projects (activities undertaken, beneficiaries, objectives..)		
		Ma May Zin Oo	Phyu	50,000	30/03/2018	Payment for Attending for High School	N/C	N/C
		Pa La Ka (Clinic)	Pa La Ka Island	180,000	30/03/2018	Donation to PaLaKa Clinic	N/C	N/C
6	Orient Pearl Co., Ltd (Zinyaw)	N/C	N/C	N/C	N/C	N/C	N/C	N/C
7	Orient Pearl Co., Ltd (Jalan)	N/C	N/C	N/C	N/C	N/C	N/C	N/C
8	Annawar Pearl Co., Ltd (Marine Pearl Company)	N/C	N/C	3,030,000	N/C	N/C	N/C	N/C
9	Pyae Sone Htet Myint Co., Ltd	N/C	N/C	N/C	N/C	N/C	N/C	N/C
10	Aquagold Myanmar Co., Ltd	N/C	N/C	3,342,750	N/C	N/C	N/C	N/C
11	Pyae Phyto Tun Co., Ltd	N/C	N/C	N/C	N/C	N/C	N/C	N/C
Total				615,084,831				

## Annex 11 Employment

### Oil and Gas

N°	Company	Total	Number of direct domestic employees		Number of direct foreign employees	
			Male	Female	Male	Female
1	Myanma Oil and Gaz Enterprise	9,261	8,161	1,100	-	-
2	Gold Petrol Joint Operating Company Inc., (GJOC Inc.)	439	398	29	12	-
3	MPRL E&P Pte Ltd. ( Yangon Branch )	198	130	65	2	1
4	PC Myanmar (Hong Kong) Limited	-	-	-	-	-
5	Posco Daewoo Corporation (Myanmar E&P Office)	244	126	44	74	-
6	PTTEP International Ltd.	-	-	-	-	-
7	Total E&P Myanmar	-	-	-	-	-
8	Gail JJ India Ltd	-				
9	Korea Gas Corporation	-				
10	Nippon Oil Exploration (Myanmar) Ltd	-				
11	ONGC Videsh Ltd.,	-				
12	Unocal Myanmar Offshore Co., Ltd.	4	1	3	-	-
13	Asia Orient International Ltd. (CJs Oc Nobel Oil)	-				
14	Bashneft International B.V. (Myanmar Branch)	-				
15	Berlanga Myanmar Pte Ltd., (Myanmar Branch)	12	6	-	3	3
16	BG Exploration & Production Myanmar Pte. Ltd. (Myanmar Branch)	1	-	-	1	-
17	Brunei National Petroleum Company Sdn Bhd (PB Myanmar)	-				
18	CAOG PTE LTD (MYANMAR BRANCH)	12	6	-	3	3
19	CFG Energy Pte Ltd.,	5	1	2	2	
20	ENI Myanmar B.V. (Myanmar Branch)	26	7	9	9	1
21	IsTech Energy EP-5 Pte Ltd., (Myanmar Branch)	7	4	2	1	-
22	Jubilant Oil & Gas Pte. Ltd.	-				
23	North Petro-Chem Corporation Myanmar Ltd. (NPCMM)	-				
24	Ophir Myanmar (Block AD-3) Limited (Myanmar Branch)	2	-	2	-	-
25	Pacific Hunt Energy Corporation (Myanmar Branch)	12	10	2	-	-



N°	Company	Total	Number of direct domestic employees		Number of direct foreign employees	
			Male	Female	Male	Female
26	Parami Energy Development Company Ltd	-				
27	Apex Geo Services Co.,	-				
28	Petronas Carigali Myanmar Inc (PCMI)	-	-	-	-	-
29	Petrovietnam Exploration Production Corporation	-				
30	Reliance Industries Ltd.	-				
31	Shell Myanmar Energy Pte. Ltd. - Yangon Branch	4	-	2	2	-
32	SNOG Pte Ltd	-				
33	Tap Energy (M-7) Co., Ltd. (Statoil)	-				
34	TRG M15 Pte. Ltd.	-				
35	Woodside Energy (Myanmar) Pte Ltd	12	2	5	5	-
36	MOECO Asia Pte. Ltd	-				
37	SmartE&PInternational Co.,Ltd	-				
38	United National Resources Development Services Co., Ltd	-				
39	Century Bright Gold Co., Ltd	-				
40	Myanmar Petroleum Exploration & Production Co., Ltd.	-				
41	Royal Marine Engineering Co.,Ltd	-				
42	Eden Group Co., Ltd	-				
43	Maurel & Prom Exploration & Production	-				
44	CNPC International Ltd.	-				
45	Asia Petroleum Investment Company (APIC)	-				
46	UPR Pte Ltd.	-				
47	A-1 Mining Company .Ltd.	-				
48	Win Precious Resources Pte Ltd.	-				
49	Palang Sophon Offshore Pte. Ltd. (PSO)	-				
50	Smart Technical Services Ltd.	-				
51	A-Lister Services Co., Ltd.	-				
52	Machinery and Solutions Co., Ltd.	-				
53	Sun Apex Holdings Ltd.	-				

N°	Company	Total	Number of direct domestic employees		Number of direct foreign employees	
			Male	Female	Male	Female
54	Young Investment Group Co. Ltd.	4	3	1	-	-
55	IGE Pte. Ltd.	-				
56	UNOG Pte. Ltd.	-				
		10,243	8,855	1,266	114	8

## Oil and Gas transportation

N°	Company	Total	Number of direct domestic employees		Number of direct foreign employees	
			Male	Female	Male	Female
1	South East Asia Gas Pipeline Co.,Ltd(Great Ocean Branch)(SEAGP)	523	313	99	93	18
2	Southeast Asia Crude Oil Pipeline (SEAOP)	593	359	96	120	18
3	Anadaman Transportation Limited(Yangon Branch)(ATL)	0	0	0	0	0
4	Moattama Gas Transportation Co.,Ltd(MGTC)	0	0	0	0	0
5	Tanitharyi Pipeline Company LLC(Myanmar Branch)(TPC)	0	0	0	0	0

## Pearl

N°	Company	Total	Number of direct domestic employees		Number of direct foreign employees	
			Male	Female	Male	Female
1	Myanmar Tasaki Co., Ltd	305	162	139	4	0
2	Myanmar Atlantic Co., Ltd	0	0	0	0	0
3	Myanmar Andman Co., Ltd	152	102	50	0	0
4	Belparl Myanmar Co., Ltd	80	72	8	0	0
5	Nino Pearl Culturing Co., Ltd	89	54	35	0	0
6	Orient Pearl Co., Ltd (Zinyaw)	199	141	58	0	0
7	Orient Pearl Co., Ltd (Jalan)	199	141	58	0	0

8	Annawar Pearl Co., Ltd (Marine Pearl Company)	78	41	37	0	0
9	Pyae Sone Htet Myint Co., Ltd	83	54	29	0	0
10	Aquagold Myanmar Co., Ltd	72	36	36	0	0
11	Pyae Phyo Tun Co., Ltd	87	46	41	0	0

## Gems and Jade

	Company	Total	Number of direct domestic employees		Number of direct foreign employees	
			Male	Female	Male	Female
1	Linn Lett Win Yadanar Gems Co Ltd	1111	1109	2	0	0
2	Yar Za Htar Ni	56	51	5	0	0
3	YADANAR TAUNG TEN	17	13	4	0	0
4	Wai Aung Gabar	250	230	20	0	0
5	Ayeyar Yadanar Gems & Jewellery Co.,Ltd	806	798	8	0	0
6	A K N K	0			0	0
7	SILVER ELEPHANT GEMS CO LTD (Ngwe Sin (NS-S))	1800	1500	300	0	0
8	Phyo Thiha Kyaw	96	84	12	0	0
9	Same Wai Hlaing (SWH)	3	3	0	0	0
10	Mya Garden (GEG)	150	130	20	0	0
11	Kan Pwint Oo	85	80	5	0	0
12	Shwe Ngar Koe Kaung	98	93	5	0	0
13	Shwe Gaung Gaung Gems Co Ltd	311	295	16	0	0
14	Htun Tauk Zabu Gems & Jewellery Co;Ltd.	934	914	20	0	0
15	Sein Lonm Taung Tan (SLTT-S)	50	50	0	0	0
16	Ayar Jade	325	320	5	0	0
17	Shining Star Light Gems & Jewellery Co.,Ltd	550	540	10	0	0
18	Yadanar Sin Thiri Gems Co	150	135	15	0	0
19	SHWE OAK KHAI MINING CO.,LTD.	305	300	5	0	0
20	Jade Mountain	64	52	12	0	0
21	Thirawmani	35	30	5	0	0
22	Phoe Thar Htoo Gems Co.,Ltd.	222	222	0	0	0
23	Myanma Seinn Lei Aung Gems Co Ltd.	24	16	8	0	0
24	Yadanar Yaung Chi	131	125	6	0	0
25	Linn Htet Aung Gems Co.,Ltd.	40	38	2	0	0
26	Norbal Three Star (GMMK)	50	47	3	0	0
27	WAN BROTHERS	40	35	5	0	0

	Company	Total	Number of direct domestic employees		Number of direct foreign employees	
			Male	Female	Male	Female
28	Mya Young Tun	50	45	5	0	0
29	Nan Htike Pyae Paing Co	250	240	10	0	0
30	Khun Paooe	72	52	20	0	0
31	Great wall Gems&Jade company (Shwe Tataing)	43	38	5	0	0
32	Great Genesis Gems (GMH)	250	220	30	0	0
33	Htat Aye Yar	5	3	2	0	0
34	Wai Family	125	110	15	0	0
35	Seng Tawng Gems&Jewellery Co., Ltd (Sai Taung Co)	270	150	120	0	0
36	Kyauk Same Nan Taw (GKN)	50	47	3	0	0
37	Jade Land	37	33	4	0	0
38	Jade Than Lwin	25	20	5	0	0
39	1 1 1	147	140	7	0	0
40	Kaung Myat Thu Ka	307	304	3	0	0
41	Seine Pwint Pwint Wai	22	20	2	0	0
42	Khine Myanmar	150	130	20	0	0
43	Unity	100	90	10	0	0
44	Wai Yan Thar (WYT)	50	45	5	0	0
45	Sin Gaung Taung	55	47	8	0	0
46	GREEN MOUNTAIN CO;LTD	150	130	20	0	0
47	Chang Long Gems & Jewellery Co Ltd	0	Nc	Nc	0	0
48	Kyaut Myat Min	30	25	5	0	0
49	Yadanar Shwe Ye Win	43	43	0	0	0
50	Myit Sone Ayar	122	121	1	0	0
51	Yadanar Aung Chan	5	0	5	0	0
52	Myanmar Imperial Jade Co	13	10	3	0	0
53	Khin Zaw Aung & Brother	145	140	5	0	0
54	Myanmar First Gems & Jewellery Co Ltd	530	520	10	0	0
55	Ever Winner [EW]	86	84	2	0	0
56	Shwe Hein Htet Gems Co Ltd	100	90	10	0	0

	Company	Total	Number of direct domestic employees		Number of direct foreign employees	
			Male	Female	Male	Female
57	Myo Nwe Gems	150	120	30	0	0
58	Tun Naing Aung	95	85	10	0	0
59	Nay Min Kabar Co	226	209	17	0	0
60	Zebu Thiri Gems Co.,Ltd	170	140	30	0	0
61	Yadanar Three Elephants Co	150	130	20	0	0
62	Kyaing International (GKI)	30	15	15	0	0
63	Nan Oo Yadanar	30	30	0	0	0
64	Su Htu Pan (Su Htoo Pan)	105	95	10	0	0
65	Long Byit	7	7	0	0	0
66	Super Sein	0	Nc	Nc	0	0
67	Win Lei Yadanar	103	95	8	0	0
68	Kyal Sin Phyu	41	36	5	0	0
69	Treasure Star Co., Ltd. (Yadanar kyal)	0	Nc	Nc	0	0
70	ARS Gems [ARS]	150	135	15	0	0
71	Yadanar Pyi Phyo Aung Gems Co., Ltd	57	55	2	0	0
72	Jade Padatar Gems Co,Ltd	200	170	30	0	0
73	Ruby Dragon Company	136	119	17	0	0
74	Northern Jade World	22	22	0	0	0
75	Kaung Htet Khaing	60	50	10	0	0
76	Kaung Swan Htet Co	150	135	15	0	0
77	Shwe Ywat Hlwar	28	26	2	0	0
78	Same Lei Yadanar Win Co (SLYW)	100	85	15	0	0
79	Hpakan King Gems & Jewellery Co. Ltd (Phar kant Bayin)	50	45	5	0	0
80	Agga Yadanar Jade Gems & Jewellery Co., LTD	2	1	1	0	0
81	Shwe War Myae (mandalay)	50	45	5	0	0
82	Delta Land	0	Nc	Nc	0	0
83	Seine Lone Aung	50	45	5	0	0
84	Aung Hein Minn	7	4	3	0	0
85	Kyauk Seinn Sun Shwin Jade Gems & Jewellery Co Ltd	100	85	15	0	0

	Company	Total	Number of direct domestic employees		Number of direct foreign employees	
			Male	Female	Male	Female
86	Yadanar Aung Tun Tauk	19	17	2	0	0
87	U YA GEMS (Oo Ya Gems & Jewellery)	10	8	2	0	0
88	Chaow Brothers Gemstone Enterprise Ltd	5	3	2	0	0
89	Myat Yamon	100	75	25	0	0
90	Nay La Pwint	238	238	0	0	0
91	Ma Li Kha Gem Stone Co	4	2	2	0	0
92	Wan Full	5	3	2	0	0
93	Aung Tu Ka Dana	5	4	1	0	0
94	Yadanar Moe Myay	25	24	1	0	0
95	Shein Family gems Co., Ltd.	19	19	0	0	0
96	Thein Gabar Aung	150	140	10	0	0
97	Jade Treasure	150	130	20	0	0
98	Lawka Nandar	0	Nc	Nc	0	0
99	Ngwe Si Hein	20	20		0	0
100	Myat Pan Khaing	0	Nc	Nc	0	0
101	Lon Hai	15	12	3	0	0
102	Goldend Light gems (Shwe Yaung Sin)	170	150	20	0	0
103	Hein Aung Lin Htet Jade Co. Ltd	170	140	30	0	0
104	Phar Kant Sai Bon	0			0	0
105	Thigi Myintzu Yadanar	50	40	10	0	0
106	Seinn Nay Chi Gems & jade company (Same Nay Chi (SNC)	32	30	2	0	0
107	Seine Light	4	4		0	0
108	New Lucky Green Gems	2	2	0	0	0
109	Mya San Dar (MSD)	0	Nc	Nc	0	0
110	Jade Thazin	150	130	20	0	0
111	Kaung Su Aung	85			65	20
112	Kachin National Development	527	320	207	0	0
113	Jade Thapyae Co.,ltd (Kyaut Seinn Tapyay)	30	25	5	0	0
114	Kaung Wai Yan Co	105	98	7	0	0

	Company	Total	Number of direct domestic employees		Number of direct foreign employees	
			Male	Female	Male	Female
115	Green Diamond Gems & Jewellery Co. Ltd (Seine Sein)	68	58	10	0	0
116	Lucky Star Jade Group	90	85	5	0	0
117	Yadanar Si	2	2		0	0
118	All Right Company (Ah Mhan Akhan Kyauk Seinn)	150	130	20	0	0
119	Jewel Crown Company (Yadanar Thayaphu)	150	130	20	0	0
120	Kaung Mon Yadanar	140	120	20	0	0
121	Green Earth Gems Co., Ltd (Seine Yaung Myay)	4	3	1	0	0
122	Global Sun Light	50	40	10	0	0
123	Aung Hlaing Kyawla	4	3	1	0	0
124	Value Standard (Ah Phoe Tan San Chain Mhe)	197	187	10	0	0
125	Seine Aung	10	8	2	0	0
126	Myint Shin Gems Co.,Ltd (Myint Shinn)	46	44	2	0	0
127	U Kyaw Thet	0	Nc	Nc	0	0
128	Buu Gar	5	3	2	0	0
129	Jade Pioneer Mining Limited (Jade Shae Saung)	0	Nc	Nc	0	0
130	Kyauk Seinn Minn Gems (Jade Min)	8	6	2	0	0
131	Yi Li Fa [YLF]	3	2	1	0	0
132	Pyi Yadanar	3	1	2	0	0
133	MELODIOUS GEMS COMPANY LIMITED (Tharyar Kyinu Phwe)	85	85	0	0	0
134	Myanmar Thura [MTY]	100	100	0	0	0
135	Kyaut Seinnn Karbarkyaw	50	30	20	0	0
136	Hole In One	33	30	3	0	0
137	Nay Chi Yadanar Co., Ltd.	44	42	2	0	0
138	Kyauk Seinn Wingabar Jade Gems & Jewellery Co.,Ltd	100	85	15	0	0
139	Ou Ryu Sein Yadanar	9	6	3	0	0
140	Kaung Htike	5	4	1	0	0
141	Sein Minn Yadanar	9	6	3	0	0
142	Treasure Five Star Co., Ltd (Yadanar Kyal Ngar Pwint)	60	40	20	0	0
143	Kyei Linn Gems & Jade Company	3	3		0	0



	Company	Total	Number of direct domestic employees		Number of direct foreign employees	
			Male	Female	Male	Female
144	Silver Sand Stone Gems co., (Ngwe Young Stone)	23	20	3	0	0
145	Wan Chang (Wan Chan)	4	3	1	0	0
146	Khaing Lon Gems Co., Ltd (Khine Lon)	150	120	30	0	0
147	PON TUNG THARR GEMS COMPANY LIMITED	12	9	3	0	0
148	Palaung National	0			0	0
149	Treasure Linn Gems Co.,Ltd (Yadanar Linn)	8	7	1	0	0
150	Treasure White Lotus (Yadanar Kyar Phyu)	10	10		0	0
151	Sein Thura San	0	Nc	Nc	0	0
152	Aung Shwe Kabar	10	7	3	0	0
153	San Taw Win	30	28	2	0	0
154	Jade Crystal Palace	3	3	0	0	0
155	Shwe Hwa	0	Nc	Nc	0	0
156	Aung Myin Thu Gems & Jewellery Co.,Ltd	85			65	20
157	Gold Jade	30	28	2	0	0
158	Thet Hein Gems & Jewellery Co;Ltd.	5	3	2	0	0
159	Myanmar Rich Land Gems (Myanmar Kywal Wa Thaw Myay)	4		4	0	0
160	MEGA STAR JEWEL LIMITED	111	103	8	0	0
161	Kan Sein Pwint	4	3	1	0	0
162	Myanmar Winning Gate (GMWG)	0	Nc	Nc	0	0
163	San Family	50	40	10	0	0
164	HONG YENG YEE SHIN GEMS & JADE COMPANY LTD	30	25	5	0	0
165	Green Comet gems& Jade company (Kyal Ta Khon Sein)	62	58	4	0	0
166	Gandawin Kyaut Myat Garden	5	5	0	0	0
167	Kaung Taw Myay	5	4	1	0	0
168	U Hla Soe Oo	3	3	0	0	0
169	80000	32	30	2	0	0
170	Than Lwin Kyaw Kyar	226	209	17	0	0
171	Kyauk Myet Shwe Pyi (Gems Shwe Pyi Co)	100	85	15	0	0
172	Moe Brothers	68	60	8	0	0

	Company	Total	Number of direct domestic employees		Number of direct foreign employees	
			Male	Female	Male	Female
173	Innwa Nay Chi Co	50	35	15	0	0
174	Jade Master	70	60	10	0	0
175	Taw Win Jade Dragon	22	20	2	0	0
176	Shwe Tun Win	8	6	2	0	0
177	Kan Thar Yar Gems Co.,Ltd.	2	2		0	0
178	Jade Brothers	50	30	20	0	0
179	Myat Myittar Mon (G & J) Co.,Ltd (to remove from Scope)	0			0	0
180	Pang Huke Duwa Co.,Ltd	137	132	5	0	0
181	Shwe Pyi Thar Gems Trading and Faceting Co-op.,Ltd	20	20		0	0
182	Khant Shwe Pyi Co.,Ltd	26	15	11	0	0
183	Nilar Yoma	409	334	75	0	0
184	Lyan Shan	0	Nc	Nc	0	0
185	Yadanar Myat Noe Thwe Gem	50	45	5	0	0
186	Kyi Wai Yan	50	35	15	0	0
187	Yadanar San Shwin Gem	200	170	30	0	0
188	HERA Co.,ltd (Hee Ya Gems)	26	23	3	0	0
189	MOGOK PRIDE	12	10	2	0	0
190	EXCELLENT RUBY & SAPPHIRE	0	Nc	Nc	0	0
191	CHATKIYAY GEMS & JEWELLERY CO.,LTD	0	Nc	Nc	0	0
192	SHWE NAING TUN	10	4	6	0	0
193	R.B.G	11	11	0	0	0
194	KHINE THIT SAR	43	39	4	0	0
195	Myanmar Lar Ba Gems Co., Ltd.	27	24	3	0	0
196	METAL METERO	30	30		0	0
197	RUBY TIGER	10	8	2	0	0
198	THAN HTIKE LU	220	200	20	0	0
199	BIRDS GEM	2	1	1	0	0
200	ZABUKYAWAUNG	0	Nc	Nc	0	0
201	KYAN FAMILY	150	145	5	0	0

	Company	Total	Number of direct domestic employees		Number of direct foreign employees	
			Male	Female	Male	Female
202	HTAY PAING	300	299	1	0	0
203	RED MOUNTAIN	0	Nc	Nc	0	0
204	KYAW NAING & BROTHERS	150	140	10	0	0
205	LAW LU	22	20	2	0	0
206	MYANMAR SITHU	85	85		0	0
207	THEITHI AUNG NGWE MOE	22	20	2	0	0
208	Pwint Phoo Nadi	5	0	5	0	0
209	Myanmar Economic Corporation	25	0	0	25	0
Total		20,036	17,804	2,037	155	40

## Gems and Jade other companies

N°	Company	Total	Number of direct domestic employees		Number of direct foreign employees	
			Male	Female	Male	Female
1	Myanmar Ruby Enterprise(Gem&Jwellery)Co.,Ltd	48	48	0	0	0
2	Duwon Star (Gem&Jwellery)Co.,Ltd	55	55	0	0	0
3	Dana Thedi Star (Gem&Jwellery)Co.,Ltd	50	50	0	0	0
4	Hawk Star(Gem & Jewellery)Co.,Ltd	32	32	0	0	0
5	Pone Nyet(Gem & Jewellery)Co.,Ltd	53	53	0	0	0
6	Sabae(Gem & Jewellery)Co.,Ltd	30	30	0	0	0
7	Seik Tra Star(Gem & Jewellery) Co.,Ltd	30	30	0	0	0
8	ThitSarPann (Gems & Jewellery)Co.,Ltd	50	50	0	0	0
<b>Total</b>		<b>348</b>	<b>348</b>	<b>-</b>	<b>-</b>	<b>-</b>

## Other Minerals

N°	Company	Total	Number of direct domestic employees		Number of direct foreign employees	
			Male	Female	Male	Female
1	NATIONAL PROSPERITY COMPANY LIMITED	879	691	188	-	-
3	GEO ASIA INDUSTRY & MINING COMPANY LIMITED	504	391	113	-	-
4	CORNERSTONE RESOURCES ( MYANMAR ) LTD.	459	250	197	12	-
5	ETERNAL MINING COMPANY LIMITED	650	520	130	-	-
6	MYANMA ECONOMIC HOLDINGS PUBLIC COMPANY LIMITED	8,450	4,200	4,250	-	-
7	KAYAH STATE MINERAL PRODUCTION COMPANY LIMITED	125	125	-	-	-
8	SHWE MOE YAN COMPANY LIMITED	109	91	18	-	-
9	GPS JOINT VENTURE COMPANY LIMITED	43	28	6	7	2
10	SHWE TAUNG MINING COMPANY LIMITED	195	184	11	-	-
11	DELCO LIMITED	1	-	-	1	-
12	MAX (MYANMAR) COMPANY LIMITED	644	556	88	-	-
13	FIRST RESOURCES COMPANY LIMITED	25	19	6	-	-
15	WIN MYINT MO INDUSTRIES COMPANY LIMITED	1,062	573	489	-	-
17	MYANMAR PONGPIPAT COMPANY LIMITED	325	238	76	10	1

N°	Company	Total	Number of direct domestic employees		Number of direct foreign employees	
			Male	Female	Male	Female
18	NGWE YI PALE MINING COMPANY LIMITED	160	100	60	-	-
20	HTOO INTERNATIONAL INDUSTRY GROUP COMPANY LIMITED	84	79	5	-	-
21	HARBOR STAR MINING COMPANY LIMITED	59	38	5	12	4
22	MANDALAY GOLDEN FRIEND MINING CO., LTD.	40	35	5	-	-
23	MYANMAR GOLDEN POINT FAMILY CO., LTD.	175	122	53	-	-
24	THAN TAW MYAT COMPANY LIMITED	25	24	1	-	-
26	MANDALAY DISTRIBUTION & MINING COMPANY LIMITED	150	100	50	-	-
28	SAN LIN INTERNATIONAL EXPORT & IMPORT COMPANY LIMITED	16	10	6	-	-
29	KAN PWINT OO MINING COMPANY LIMITED	8	6	2	-	-
30	TOP TEN STAR PRODUCTION CO., LTD.	255	232	14	7	2
31	HEAY HEIN COMPANY LIMITED	58	50	7	1	-
32	NGWE KABAR MYANMAR COMPANY LIMITED	87	80	7	-	-
33	MYAUK KYUN THU MA MA MINING & REFINERY COMPANY LIMITED	80	80	-	-	-
35	DRAGON CEMENT COMPANY LIMITED	668	569	99	-	-
36	PRINCE MANUFACTURING COMPANY LIMITED	40	37	3	-	-
37	HTAT YEE LINN MINING & REFINERY COMPANY LIMITED	70	70	-	-	-
38	MYAY NAGAR MINING COMPANY LIMITED	17	12	5	-	-
40	YE HTUT KYAW MINING COMPANY LIMITED	21	21	-	-	-
41	MYANMAR TIN -TUNGSTEN COMPANY LIMITED	40	30	10	-	-
42	Myanmar Yang Tse Copper Ltd	2,237	1,960	247	29	1
43	Eden Energy & Natural Resources Development Co., Ltd	610	576	34	-	-
44	Kanbawza Industries Ltd	387	276	84	26	1
45	MYANMAR WANBAO MINING COPPER LTD	1,955	1,421	373	127	34
47	MYANMAR CNMC NICKEL COMPANY LIMITED	1,979	1,422	121	414	22
48	24 HOUR MINING & INDUSTRY COMPANY LIMITED	8	7	1	-	-
49	A & A NATURAL RESOURCES DEVELOPMENT CO., LTD	47	35	12	-	-
50	ASIA PHYO MINING COMPANY LIMITED	3	3	-	-	-
51	BLUE DIAMOND CEMENT COMPANY LIMITED	1,170	895	275	-	-
52	DAGON MINING COMPANY LIMITED	7	7	-	-	-

N°	Company	Total	Number of direct domestic employees		Number of direct foreign employees	
			Male	Female	Male	Female
53	DIAMOND SHARK MINING COMPANY LIMITED	45	31	2	12	-
55	GREEN ASIA COMPANY LIMITED	10	8	2	-	-
57	GROUP OF FOUR MINING COMPANY LIMITED	72	64	8	-	-
58	HTUT KHAUNG KYAW MINING COMPANY LIMITED	8	8	-	-	-
59	JUNE CEMENT INDUSTRY LTD.	38	34	4	-	-
60	LINN PYAE MINING COMPANY LIMITED	102	73	29	-	-
61	LOI CHAI NAGAR MINING COMPANY LIMITED	16	16	-	-	-
62	MAY FLOWER MINING ENTERPRISES LIMITED	17	10	7	-	-
64	MOUNT CHING YING MINING COMPANY LIMITED	23	20	3	0	0
65	MYANMAR APEX MINING CO., LTD	52	42	10	-	-
66	MYANMAR NAING GROUP MINING COMPANY LTD	7	7	-	-	-
68	MYINT INVESTMENT GROUP COMPANY LIMITED	5	5	-	-	-
70	SHWE PAUK PAUK MINING COMPANY LIMITED	31	20	11	-	-
71	SHWE PIN LE MINING & INDUSTRY COMPANY LIMITED	40	34	1	5	-
72	SILVER BRIGHT COMPANY LIMITED	17	16	1	-	-
73	THE SILVER LION MINING COMPANY LIMITED	230	200	30	-	-
74	THIHA THANT HEIN MINING COMPANY LIMITED	39	36	3	-	-
75	TRIPLE "A" CEMENT INTERNATIONAL COMPANY LIMITED	215	21	194	-	-
76	U E EXPORT IMPORT COMPANY LIMITED	236	181	55	-	-
78	YIG COMPANY LIMITED	4	3	1	-	-
79	YOUNG INVESTMENT GROUP COMPANY LIMITED	18	16	2	-	-
81	ZABU TALU MINING COMPANY LIMITED	20	15	5	-	-
82	RUBY DRAGON MINING COMPANY LIMITED	93	84	9	-	-
84	SEIN CHI LIN MINING CO., LTD.	190	140	50	-	-
85	AUNG HTUN LINN SHEIN WIN MINING & REFINERY COMPANY LIMITED	70	70	-	-	-
87	Future Engineering Gold Mining	70	50	20	-	-
92	NAN KANAUNG MINING & ENGINEERING COMPANY LIMITED	15	15	-	-	-
93	NEW ERA GOLD COMPANY LIMITED	36	32	4	-	-
94	SHWE PYI NAGAR COMPANY LIMITED	27	22	5	-	-

N°	Company	Total	Number of direct domestic employees		Number of direct foreign employees	
			Male	Female	Male	Female
	Total	25,673	17,436	7,507	663	67

BDO LLP

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EITI MYANMAR

**Annex 12 The reconciliation sheets by company**

See the Excel attached





## Annex 13 The follow up of the corrective actions requested during the validation

Corrective action requested	Corrective action undertook in the EITI report 2017-2018
<p>In accordance with Requirement 1.2.a, Myanmar must ensure that companies particularly the military-affiliated companies, as well as oil and gas companies outside of the MSG are fully, actively and effectively engaged in the EITI process. If there are barriers to the participation of these companies, the government must, in accordance with Requirement 1.2.b ensure that there is an enabling environment for company participation with regard to relevant laws, regulations, and administrative rules as well as actual practice in implementation of the EITI.</p>	<p>Those companies and their subsidiaries were included in the reconciliation scope. Please review the section 5 for the differences raised. We also received contextual information from those companies. Please review the section 3.3.12</p>
<p>In accordance with Requirement 1.3.c of the EITI Standard and the civil society protocol, the government must ensure that there are no obstacles to civil society participation in all aspects of the EITI process. Accordingly, the Government of Myanmar is required to ensure that there are no obstacles to civil society's ability to engage in public debate related to the EITI process and that civil society is able to express opinions about the EITI process without restraint, coercion or reprisal. The government is further required to ensure that mechanisms are in place to enable civil society to undertake dissemination of EITI data and outreach in all areas of the country, including subnational EITI implementation.</p>	<p>This recommendation will be followed by the NCS and the MSG.</p>
<p>In accordance with Requirement 2.2.a.ii of the EITI Standard, Myanmar is required to disclose the technical and financial criteria used in awarding licenses in the mineral and gemstone sector. The MSG should also include a discussion of non-trivial deviations from the applicable legal and regulatory framework governing license awards pursuant to Requirement 2.2.a.iv. Lastly, the MSG should clarify the rules on transfer of licenses, particularly whether it is allowed in the mineral sector. The MSG is encouraged to systematically disclose all information required by Requirement 2.2 of the Standard, in accordance with the level of detail required by the Standard.</p>	<p>This recommendation is detailed in the section 3.2.6</p>
<p>In accordance with Requirement 2.3 of the EITI Standard, Myanmar is required to publicly disclose the following information that were missing the EITI Report: the coordinates of several ME3 blocks, the dates of application, awards and duration of all oil and gas and mining licenses, and the commodities for each oil and gas block. To strengthen implementation, Myanmar should ensure that license information as required under Requirement 2.3 of the Standard are disclosed through a public register as part of the government's routine and systematic disclosure of information.</p>	<p>According to the information received from the government agencies, we understand that ME3 does not exist anymore.</p>
<p>In accordance with Requirement 2.6, Myanmar is required to disclose the details regarding the terms attached to the equity stake of all SOEs in extractive projects. It should also disclose the SOE's responsibility to cover expenses at various phases of the project cycle, including the details of payment of taxes in behalf of joint venture partners and miscellaneous revenues in the case of oil and gas. MOPF should also disclose the details of the loan guarantees it provided to SOEs as well as prevailing rules on retained earnings. Finally, Myanmar is required to clarify whether UMEHL and MEC are government- owned corporations. If they are, the MSG is required to engage them in the EITI process in accordance with Requirement 1.2, include them in the scope of the EITI reporting process and assess the comprehensiveness of its interests in extractive projects as disclosed in the MEITI Report. To strengthen implementation, the MSG is encouraged to consider examining the alleged miscellaneous revenues of MOGE.</p>	<p>-The information regarding the equity stake of all SOEs in extractive projects is provided in the section 3.3.12 and 3.2.8; - the Loan details provided by the MOPF are provided in the section 6.8; -UMEHL and MEC were considered as SOEs, the information gathered and reconciled are provided in the section 3.3.12</p>
<p>In accordance with Requirement 3.2 of the EITI Standard, Myanmar is required to disclose production volume and value by commodity for jade and gems. To strengthen implementation, the MSG should consider including export data from transactions outside of the gem's emporium in the scope of the EITI Report. Government is encouraged to regularly disclose this information through government platforms.</p>	<p>The information regarding the exports and production of Gems and Jade is presented in the section 1.3 and 5.7 of the present report.</p>

Corrective action requested	Corrective action undertook in the EITI report 2017-2018
<p>In accordance with Requirement 3.3 of the EITI Standard, Myanmar should disclose comprehensive data for export volumes and value for gems and jade, disaggregated by commodity. To strengthen implementation, the MSG should consider including export data from transactions outside of the gems emporium in the scope of the EITI Report. Government is encouraged to regularly disclose this information through government platforms.</p>	<p>The information regarding the exports and production of Gems and Jade is presented in the section 1.3 and 5.7 of the present report.</p>
<p>In accordance with Requirement 4.2, Myanmar should categorically assess the materiality of in-kind payments for the three sectors. It should also be clarified in the next report whether there are in-kind payments for oil and gas. The sales of the state's share for oil and gas should be disclosed including the volumes sold and revenues received. For mining and gems, in-kind payments should be disaggregated by paying company to the SOE, and by buying company in the case of sales of the government's share. To strengthen implementation, the government is encouraged to systematically disclose data on on-kind revenues through government platforms.</p>	<p>The materiality assessment is presented in the chapter 4 of the report regarding the scoping study. The disclosure of the in-kind payments received by the government is presented in the 6.4 of the report.</p> <p>The disclosure of the sales of the government shares will be presented in the first commodity trading report to be prepared after the publication of the current report.</p>
<p>In accordance with Requirement 4.5, government should ensure that all transfers from government to SOEs are comprehensively and publicly disclosed in government platforms. Myanmar should review the comprehensiveness of information disclosed regarding SOE transactions in view of what is revealed from other sources of information, including whether there are material transfers made between the SOE's other accounts to other entities.</p>	<p>All the transfers reported by the SOEs were explained in the flow charts presented in the section 3.6 of the report. The total amounts transferred are presented in the section 5.6 of the report. The mechanism of transfer performed by the SOEs are presented in the section 3.3.12 and 3.2.8.</p>
<p>In accordance with Requirement 5.1, Myanmar is required to provide further explanation regarding the extractive revenues that are not recorded in the national budget. The MSG should consider expanding the scope of EITI reporting to further examine the details of these Other Accounts, such as tracing the exact extractive sector revenues that go to these accounts and how these revenues are spent, as well as explaining the rules in maintaining these accounts.</p>	<p>Further explanation regarding the OA process are presented in the section 3.6.4 of the current report. A reconciliation process was also initiate to raise any discrepancy between the SOEs and the government agencies presented in the section 5.6.</p>
<p>In accordance with Requirement 6.1 of the EITI Standard, companies are required to disclose social expenditures when mandated by law or contract. Where such benefits are provided in-kind, it is required that companies disclose the nature and deemed value of the in-kind transaction. The beneficiaries and their functions should also be disclosed. Where possible, these payments should be reconciled. The companies are further encouraged to disclose discretionary social expenditures where material. The MSG is encouraged to develop a reporting process with a view to achieving a level of transparency commensurate with the disclosure of other payments.</p>	<p>Those payments are included in the annex 9 and 10 and section 6.5 of the report.</p>
<p>In accordance with Requirement 6.2, Myanmar is required to include disclosures from SOE(s) on their quasi-fiscal expenditures including SOE(s) payments for social services, public infrastructure, fuel subsidies and national debt servicing, etc. outside of the national budgetary process. The multi-stakeholder group is required to develop a reporting process with a view to achieving a level of transparency commensurate with other payments and revenue streams and should include SOE subsidiaries and joint ventures.</p>	<p>The reporting template of the SOE include a separate sheet to report the quasi-fiscal expenditure. Also, during the workshop, the IA explained the definition and the nature of this information. Following the R.T received, the SOEs did not report any quasi-fiscal expenditure</p>

## Annex 14 Person contacted or involved

No	Name	Position
<b>BDO LLP</b>		
1	Tim Woodward	Partner
2	Ben Toorabally	Director
3	Hedi Zaghouani	Manager
4	Sami Sakka	Audit supervisor
5	Ahmed Zouari	Audit supervisor
6	Maher Kabsi	Audit supervisor
7	Bilel Yahyaoui	Audit senior
8	Mohamed Ali Ghali	Audit senior
<b>BDO Myanmar</b>		
1	JOE YEW	Executive director
2	Su Mon Swe	Senior Executive
3	Nang Hnin Thet Htwe	Senior Executive
4	Crystal Aung	Senior Executive
5	Phu Pwint Phyu	Senior Executive
<b>National Coordination Secretariat (NCS)</b>		
1	U Soe Win	National Coordinator
2	U Aung Khine	Deputy National Coordinator
3	U Htun Paw Oo	Technical Specialist
4	Daw Zin Mar Myaing	Programme and Technical Advisor
5	Daw Hnin Htet Htet Aung	Program Manager
6	U Nay Min Maung	Technical Coordinator
7	U Hein Htet Soe	Technical Officer
8	U Kyaw Thin Maung	Program Assistant
9	U Zwe Sithu Aung	BO Coordinator
10	Daw Htet Nandar Aung	Senior Communication Officer
11	U Zin Ko Ko Aung	Communication Officer
12	U Soe Thiha Naing	Admin Officer
13	U Tat Tun Sai	Admin Assistant
14	U Maung Maung Myint Lwin	IT Technician
<b>Budget Department (BD)</b>		
1	Daw Khin Khin Lwin	Director
2	Daw Khin Pa Pa Khaing	Deputy Director
3	Daw Thwe Thwe Tun	Deputy Director
4	Daw Chaw Su Khaing	Deputy Director
5	Daw Myo Myint Than	Assistant Director
6	Daw Phyu Phyu Thant	Assistant Director
7	Daw Shwe Ye Win	Staff Officer
8	Daw Mai Khin Nway Shein	Staff Officer
9	Daw Moe Moe Aye	Staff Officer
10	Daw Sein Lae Lae	Staff Officer
11	Daw Su Yee Hlaing	Deputy Staff Officer
<b>Budget Department (SEE)</b>		
1	Daw War War Tun	Director
2	Daw Chaw Su Khine	Deputy Director
3	Daw Swe Zin Oo	Assistant Director
4	Daw Cho Cho Win	Assistant Director

No	Name	Position
5	Daw Moe Thuzar Win	Assistant Director
6	Daw May Zin Phyu	Assistant Director
7	Daw Naw Yin Yin Myint	Staff Officer
8	Daw Aye Aye Mon	Staff Officer
<b>Treasury Department (TD)</b>		
1	Daw Than Than Win	Director
2	Daw Khin Nyo Theint	Assistant Director
3	Daw Hay Mar Hnin	Staff Officer
4	Daw Ei Ei Aung	Staff Officer
5	Daw Marlar Soe	Staff Officer
<b>Internal Revenue Department (IRD)</b>		
1	Daw Mu Mu Saw	Director (Statistics Directorate)
2	U Ne Lin Aye	Deputy Director
3	U Aung Lwin	Assistant Director
4	U Myint Naing Oo	Assistant Director
5	Daw Aye Aye Cho	Assistant Director
6	Daw Thidar Hlaing	Assistant Director
7	Daw Thidar Moe	Assistant Director
8	Daw Tin Mar Mar Thet	Assistant Director
9	Daw Swe Swe Oo	Assistant Director
10	Daw Yu Yu Sein	Assistant Director
11	Daw Myat Theingi	Staff Officer
12	Daw Sandar	Staff Officer
13	Daw Nay Chi Khaing	Staff Officer
14	U Soe Naing	Staff Officer
15	Daw Wai Wai Phyo	Staff Officer
16	U Zaw Moe Kyaw	Staff Officer
17	U Aung Kyaw Oo	Staff Officer
18	Daw Thin Thin Naing	Staff Officer
19	Daw May Su Thar	Staff Officer
20	Daw Ei Ei Khaing	Deputy Staff Officer
21	Daw Moe Moe Hlaing	Deputy Staff Officer
22	U Kyaw Swar Linn	Deputy Staff Officer
23	U Hein Zaw	Deputy Staff Officer
24	Daw Kyaw Mone Yee	Deputy Staff Officer
25	U Kyaw Zin Oo	Deputy Staff Officer
26	U Thet Ko Oo	Deputy Staff Officer
27	U Wai Myo Zin	UD
<b>Myanmar Customs Department (MCD)</b>		
1	U Than Swe Tint	Assistant Director
2	U Zaw Zaw	Assistant Director
3	Daw Shwe Sin Win	Custom Inspector
4	Daw May Yadanar Tun	Custom Inspector
5	Daw Chaw Kay Khaing	Custom Inspector
6	Daw Win Win Than	Deputy Custom Inspector
<b>Office of the Auditor General of the Union(OAG)</b>		
1	Daw Khaing Khaing Ag	Director General
2	Daw San San Win	Deputy Director General
3	Daw Hla Hla Kyein	Director
4	Daw San San Myint	Director

No	Name	Position
5	Daw Hla Than	Deputy Director (Natural Resources)
6	Daw Mary	Assistant Director
7	Daw Kywat Kywat Htun	Assistant Director
8	Daw Chaw Kalayar Shwe	Assistant Director
9	Daw Khine Phyo Wai	Assistant Director
<b>Central Statistical Organization (CSO)</b>		
1	U Than Zaw	Deputy Director General
2	Daw Khin Moe Moe	Director
3	Daw Cing Lun Hwai	Director
4	Daw Hla Myo Khaing	Staff Officer
5	Daw Thein Htet Htet Wai	Deputy Staff Officer
6	Daw Phu Pwint Phyu	Deputy Staff Officer
7	Daw Ei Thandar Soe	Deputy Staff Officer
8	U Yan Myo Aung	Deputy Staff Officer
<b>Natural Resource Governance Institute (NRGI)</b>		
1	U Maw Htun Aung	Country Manager
2	Daw Aye Kyithar Swe	Myanmar Senior Officer
3	U Hosana Chay	Myanmar Officer
<b>Myanmar Alliance for Transparency and Accountability (MATA)</b>		
1	U Ye Thein Oo	Member of MATA
2	U Naing Lin Htut	Member of MATA
3	U Htoo Aung	Program Coordinator (EITI/Communication)
4	U Myo Min Thant	Program Coordinator (EITI)
<b>World Bank Group (WBG)</b>		
1	Mrs. Shona Kirkwood	EITI Implementation Support Coordinator
2	Tinzar Htun	EITI Implementation Support Consultant
<b>Ministry of Commerce - Department of Trade</b>		
1	U Minn Minn	Director General
2	Daw Cho Thet Mu	Deputy Director
3	Daw San San Aye	Assistant Director
4	Daw Khaing Khaing Soe	Assistant Director
5	Daw Lae Lae Win	Computer Operator
<b>General Administration Department (GAD)</b>		
1	Daw Mi Mi Win	Director
2	U Phone Myat Min	Director
3	U Win Lwin	Deputy Director
4	U Hein Thu	Deputy Director
5	U Hla Myo	Assistant Director
6	U Aung Ko Ko Lin	Staff Officer
7	Daw Thaw Thaw Han Thar	Staff Officer
<b>Department of Mining (DOM)</b>		
1	U Khin Latt Gyi	Director General
2	U Kyaw Thet	Deputy Director General
3	U Kyaw Zaw Htun	Deputy Director
4	Daw Soe Sandar Maung	Assistant Director
5	Daw Su Pyae Sone Swe	Deputy Staff Officer
6	Daw Thidar	Cashier-1
7	Daw Khin Khin Soe	
<b>Mining Enterprise 1 (ME-1)</b>		
1	Daw Mi Mi Kyawt	Manager

No	Name	Position
2	Daw Nan Htar Htar Oo	Manager
3	Daw Theingi	Assistant Manager
4	U Soe Naing	Staff Officer
5	Daw Hnin Aye	SE-2
<b>Mining Enterprise 2 (ME-2)</b>		
1	U Ye Myo Min	Assistant General Manager
2	U Lin Lin Khun Koe	Manager
3	Daw Ohnmar Linn	Assistant Manager
4	Daw Ei Mon Cho	Account-1
5	Daw Aye Mya Bo	Superintendent
<b>Myanmar Gems Enterprise (MGE)</b>		
1	U Min Thu	Managing Director
2	U Tun Tun Zaw	Manager
3	U Shwe Win	Manager
4	Daw Kyu Kyu Win	Assistant General Manager
5	Daw Swe Swe Aung	Assistant Manager
6	Daw Kyein Shin Yan	Assistant Manager
7	Daw Kyaut Su Thein	Gem Sorter-1
8	Daw Khwer Nyo Htay Ko	Gem Sorter-1
<b>Myanmar Gems &amp; Jewellery Enterprise Association (MGJEA)</b>		
1	U Zaw Bo Khant	Vice Chairman
2	U Thet Win Tun	CEC
<b>DGSE</b>		
1	U Soe Win	Geologist
2	Daw Nyein Mya	Assistant Geologist
3	Daw Khin San Maw	Staff Officer
<b>MOGE</b>		
1	U Myo Myint Oo	Managing Director
2	U Than Htay Aung	Expert
3	Daw Myint Myint Khaing	Manager
4	U Nay Aung	Manager
5	Daw Nu Nu Yi	Deputy Director (Finance)
6	Daw Kyi Kyi Pyone	Advisor
7	U Than Zaw	Account-1
8	Daw Thandar Soe	Cashier-1
9	Daw Sandar Soe	
<b>OGPD</b>		
1	U Than Zaw	Director General
2	U Win Maw	Deputy Director General
3	Daw Win Win Kyu	Deputy Director
4	Daw Su Su Soe	Deputy Director
5	Daw Mu Mu Myint	Deputy Director
6	Daw Su Mi San	Assistant Director
7	Daw Thandar Oo	Staff Officer
8	Daw Kyi Zar Oo	Staff Officer
<b>MPE</b>		
1	U Tayzar Linn	Deputy General Manager
2	U Tin Win Ko	Assistant General Manager
3	Daw San Dar Tint	Manager
4	Daw Pan Pa Pa Lin	Manager

No	Name	Position
<b>Forest Department (FD)</b>		
1	Dr.Nyi Nyi Kyaw	Director General
2	U Khin Maung Win	Director
3	U Aung Win Tun	Director
4	U Tin Htun	Director
5	U Kyaw Myo Htwe	Deputy Director
6	U Phyo Zin Maung Naing	Assistant Director
7	U Hla Htay Aung	Assistant Director
8	U Htun Htun Wai	Assistant Director
<b>Total E &amp; P Myanmar</b>		
1	Daw May Thet Su Oo	Finance
2	U Win Tin	Head of Contractual and Commercial Support (MSG Member)
<b>MPRL E &amp; P</b>		
1	Daw Yin Yin Aye	Senior Accountant
2	Nang Hseng Noon	Accountant
<b>Myanmar Federation of Mining Association</b>		
1	U Khin Maung Han	Chairman
2	U Thet Naing Win	Secretary (Admin)



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