



Lebanese Oil & Gas Initiative
المبادرة اللبنانية للنفط والغاز

Investigating Lebanon's pre-qualified oil and gas bidders: Who are they, and how should we assess them?

October 2017



Lebanese Oil & Gas Initiative

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A LOGI Report

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Table of Contents

TABLE OF CONTENTS

- p.7 1. Executive Summary*
- p.15 2. Introduction*
- p.17 3. Lebanon's oil and gas industry: Where are we now?*
 - p.18 a. The Lebanese petroleum industry*
 - p.19 b. General comments on development of a legal framework for petroleum activities*
 - p.19 i. Operators roles and responsibilities*
 - p.20 ii. Non-operators roles and responsibilities*
 - p.21 c. Government criteria for prequalifying companies*
 - p.22 d. A concerning loophole in pre-qualification*
- p.25 4. Assessing companies: Additional criteria to consider*
- p.27 5. Methodology: How do we assess pre-qualified companies?*
 - p.29 a. Disclaimer on the methodology*
 - p.31 b. Corruption-related criteria*
 - p.31 i. Company ownership*
 - p.32 ii. Corruption history*
 - p.33 iii. Anti-corruption policy*
 - p.34 iv. Home-country transparency measures*
 - p.34 c. Sustainability criteria*
 - p.35 i. Industry-specific environmental reporting*
 - p.36 ii. Environmental track record*
- p.37 6. Results: Profiling the 52 pre-qualified companies*
 - p.38 a. Companies by role*
 - p.42 b. Companies by corruption criteria*
 - p.47 c. Home-country transparency measures*
 - p.49 d. Companies by environmental criteria*
 - p.52 e. Full summary of findings table*
- p.59 7. Conclusion & recommendations*

p.63 Annex A: Detailed company profiles

*p.93 Annex B: Sources for home-country
transparency measures data*

p.101 Appendix: Endnotes





1. Executive Summary

1. EXECUTIVE SUMMARY

A total of 52 companies are pre-qualified to bid in Lebanon's first offshore oil and gas licensing round, which closes on October 12, 2017. **While the government ran transparent pre-qualification processes to screen these companies in 2013 and 2017, important questions are left unaddressed.**

- Who are these companies?
- What more do we need to know about them?

Lebanese decision makers and citizens need to learn more about these companies' corruption and environmental management track records.

To find out more, the Lebanese Oil & Gas Initiative, a local non-governmental organization dedicated to transparency and sound resource management, initiated an intensive research project into how the industry operates, what are key corruption and environmental risks in the oil and gas industry and who are the companies that can bid for rights to explore for and produce natural resources that belong to the nation.

Basic starting facts:

- 52 individual companies are prequalified (including two partnerships where the partners must bid together if they bid)
- Lebanese law requires companies to form a consortium including no fewer than three partners to bid
- 13 companies are pre-qualified as operators, and 39 as non-operators

LOGI did not re-evaluate companies based on the government's criteria. Rather, LOGI expanded on the state's criteria and evaluated companies based on track records of corruption and environmental damage. After extensive research, described in the Methodology section, **LOGI settled on six evaluation criteria:**

- Four criteria related to companies' corruption track record and policies
- Two criteria related to companies' environmental track record and policies.

Evaluation Themes	Evaluation Criteria	Question Asked	Source of Data
Corruption	Company ownership	Who owns the company?	<ul style="list-style-type: none"> • Stock exchange disclosures. • Company annual reports. • Notes to company consolidated financial statements
	Corruption history	Has the company been accused of corrupt practices?	<ul style="list-style-type: none"> • US Securities and Exchange Commission's foreign corrupt practices act legal actions • US Department of Justice's foreign corrupt practices act legal actions • 2016 Company disclosures in annual reports and notes to company consolidated financial statements
	Anti-corruption policy	Does the company publish an anti-corruption policy on its website?	<ul style="list-style-type: none"> • Company website
	Home-country transparency measures	Does the company's country of registration have a whistleblower protection law? An access to information law? Is the country an EITI member?	<ul style="list-style-type: none"> • Internet research
Environmental	Industry-specific environmental reporting	Does the company produce an industry-specific sustainability report?	<ul style="list-style-type: none"> • Company website
	Environmental track record	Has the company been responsible for a large offshore spill or leak?	<ul style="list-style-type: none"> • Database of Center of Documentation, Research and Experimentation on Accidental Water Pollution

Given that the 52 companies are registered in a variety of countries around the world, searching through court records and commercial registries for criminal histories and ownership of each individual company was not feasible. There are also several media reports on companies' corruption allegations which are unverifiable. This is why LOGI's information gathering was targeted at factual, verified information including stock exchange disclosures, government judiciary sources, and company reports. We may have missed some allegations, but this exercise should give a good sense of the risks we face in this sector and the need for close monitoring.

Our evaluation found that the oil and gas industry is at high risk for corruption and environmental damage. Even Statoil, which is partially owned by Norway and considered one of the most transparent oil and gas enterprise, admitted to paying bribes for contracts in Iran.

In summary, LOGI found that:

On companies' corruption track record and policies:

- 8 of the 52 companies pre-qualified in Lebanon have been involved in legal disputes related to corruption: Chevron, ENI, GDF Suez (Engie), MOL Hungarian Oil and Gas Company, Petrobras, Shell, Statoil, Total.
- 3 admitted guilt in what is known as a “deferred prosecution agreement”: Shell, Statoil and Total.
- 2 reached settlements that did not involve admissions of guilt: Chevron and ENI
- 1 was found not guilty during arbitration: MOL Hungarian Oil and Gas
- 15 do not publish beneficial ownership information.
- 9 have no published anti-corruption policy.
- 24 of the 29 company home countries are not EITI members
- 11 company home countries do not have a whistleblower protection law
- 2 company home countries do not have access to information laws (and for two, information to clearly answer this question could not be found)
- 1 company, New Age, that has not been listed among the companies that have submitted to be pre-qualified as a non-operator in 2017, has been prequalified as non-operator and appeared in the final list of prequalified companies in April 2017.

On companies' environmental track record and policies:

- 3 of the 52 companies pre-qualified in Lebanon have been involved in large-scale offshore oil spills or gas leaks.
- 28 of the 52 companies do not publish industry-specific sustainability reports.

In summary, it is clear from this analysis that risks of corruption and environmental damage are extremely high in the oil and gas industry. Most companies have traceable negative track records which is major cause of concern. This is why LOGI has three main asks:

1. Ask the Lebanese government to set new pre-qualification criteria that takes into consideration companies' corruption/transparency, and environmental track records.
2. Prompt the Lebanese citizens to actively ask for companies' ownership and be aware of the latter's track records.
3. Support Lebanon in establishing an effective monitoring mechanism of the industry through: (1) transparent Lebanese regulations that empower civil society; (2) a voluntary code of ethics targeting companies; (3) selecting companies with strong in-country oversight.

LOGI's recommendations to improve transparency in Lebanon's oil & gas regulations include:

On Corruption Risks

- LOGI recommends that the Lebanese Petroleum Administration addresses the issue around New Age prequalification for the second round by publishing documents that showcase that this company submitted its application prior to the deadline of the second prequalification round.
- LOGI recommends that Lebanon join and fully implement the EITI.
- LOGI recommends that the LPA & the government disclose the names of companies which bid on each block, along with provisional contract winners, & actual contract winners.
- LOGI recommends that the LPA and the government disclose the terms and outcomes of any negotiations that took place with companies to select a final winner.
- LOGI recommends that the government address the discrepancy that currently exists between articles 3.3 & 7.4 of the 2013 decree used as the basis for pre-qualifying companies
- LOGI recommends that any awarding of contracts under article 3.3 be closely monitored by the LPA and civil society to ensure that such right is not used inappropriately

- LOGI recommends that the government establish a requirement to disclose beneficial owners by law as soon as possible that employs a clear and broad definition for beneficial ownership
- LOGI recommends that the government develop a roadmap for implementing beneficial ownership reporting to ensure proper execution
- LOGI recommends that the government establish an independent oversight & monitoring mechanism for any negotiations between the Lebanese government and companies bidding in licensing rounds
- LOGI recommends that the government publish all signed contracts
- In reference to some companies not having an anti-corruption policy, LOGI recommends that a voluntary code of ethics be drawn for companies to sign prior to initiation of their activities in Lebanon.

On Environmental Risks

- LOGI recommends that the LPA demand oil and gas companies to conduct environmental impact assessments (EIAs) during the exploration phase of project life cycles as this is not required under the model contract, even if it is already required by Lebanese law. The contracts only call for EIAs after resources have been identified and appraised (i.e., prior to development and production). However, to best protect Lebanon's marine environment, EIAs should be conducted prior to any seismic surveying and prior to any exploration- or appraisal-well drilling.
- LOGI recommends that the LPA maintain a public database of equipment being used by companies working offshore as well as information on the maintenance of said equipment. Research for this project revealed that spills and leaks sometimes result from a lack of properly maintained equipment. A public database outlining maintenance schedules for equipment with indications of whether or not such maintenance was performed will help citizens and civil society keep a close eye on the process.

On Local Content Policies

- LOGI recommends that the LPA/Minister of Energy and Water publish a strategic plan for implementing and evaluating the impact of local content policies
- LOGI recommends that the LPA/Minister of Energy and Water publish local content impact reports on a twice-yearly basis & create a monitoring & evaluation mechanism.

On Future Licensing Rounds

- The Ministry of Energy and Water should publish reasons for companies' disqualification in future licensing rounds
- The LPA should collect and publish companies QHSE records as submitted in line with the criteria set out in the first licensing round.
- The LPA should demand companies submit a similar report -- to be published -- regarding outstanding litigation involving the company.
- The LPA should add the publication of anti-corruption policies as a criterion on which to pre-qualify future applicants
- The LPA should add publishing industry-specific Sustainability Reports as a criterion on which to pre-qualify future applicants





2. Introduction

2. INTRODUCTION

Lebanon is about to close its first offshore oil and gas licensing round. Fifty-two companies¹ are pre-qualified to bid, and those bidding must submit their offers on October 12, 2017.

The rules governing the process are generally in line with international best practice, and the companies authorized to participate in the licensing round are almost all well established in the oil and gas industry.

Lebanon has a weak environmental record² and its corruption perception index ranking in 2016 by Transparency International (TI) placed it among the bottom 25 percent of 176 countries surveyed.³ The oil and gas industry in general has a documented history of environmental damage and exposure to legal inquiries involving corruption allegations.

The oil and gas industry, is a risky one. Fatal accidents, as well as spills or leaks that cause environmental damage, are arguably common. A 2014 anti-bribery report by The Organization for Economic Co-operation and Development (OECD) found the highest percentage of anti-bribery legal action in OECD countries involved the extractives sector (which includes oil and gas).⁴

It is within this context that the Lebanese Oil and Gas Initiative, (LOGI), an independent Non-Governmental organization based in Beirut that promotes the transparent and sound management of the country's oil and gas resources, carried out an extensive research project to learn more about these pre-qualified companies and to disseminate this information to Lebanese citizens. In doing so, LOGI hopes to enlighten the public about these companies some of which could be at the forefront of an entirely new industry in Lebanon and urge the government to fully appreciate and mitigate the potential risks of environmental damage and corruption that could result from this sector.





3. Lebanon's oil and gas industry: Where are we now?

3. LEBANON'S OIL AND GAS INDUSTRY: WHERE ARE WE NOW?

Between 1947 and 1963, there were seven attempts to find oil in Lebanon.⁵ All of them failed. Just before hostilities erupted in 1975, attention shifted offshore. Under international law, countries can claim the sole right to exploit resources in their offshore waters in an area known as an Exclusive Economic Zone (the size of a country's EEZ depends on the proximity of neighbors, and countries with abutting EEZs are required to negotiate their EEZ boundaries among themselves). The first seismic surveys in Lebanon's Exclusive Economic Zone in the Mediterranean Sea were carried out near Tripoli in 1971.⁶ Offshore surveying resumed in 1993 in Lebanon⁷ and six years later offshore natural gas discoveries were announced in both Palestinian and Israeli EEZs.⁸ Surveying of Lebanon's EEZ continued throughout the 2000s, as did the process of drafting modern oil and gas legislation with the assistance of Norway's Oil for Development program. In 2010, Lebanon passed the "Offshore Petroleum Resources Law" (OPRL) which laid out the basic framework for the sector's governance.

a. Governance structure of Lebanon's oil and gas sector

The OPRL governs the country's offshore oil and gas sector and divides decision-making power for the sector among three players:

1. The Council of Ministers (CoM)
2. The Minister of Energy and Water (MoEW)
3. The Lebanese Petroleum Administration (LPA), a regulator for the sector which, in accordance with the OPRL, enjoys "financial and administrative autonomy with the Minister of Energy and Water exercising tutelage authority."⁹

Table 1: Governance of Lebanon's oil and gas sector

Government Institution	Responsibility
Parliament ¹⁰	Votes on oil and gas laws and oversees CoM
Council of Ministers	Sets oil and gas policy
Minister of Energy and Water	Implements oil and gas policy
Lebanese Petroleum Administration	Manages and regulates sector under the authority of the Minister of Energy and Water

b. Companies' roles and responsibilities under Lebanese law

According to the OPRL, one method of awarding exploration and production rights is through an exploration and production sharing agreement.¹¹ The law further stipulates that such an agreement shall be based on a model contract,¹² which, according to international transparency advocate Global Witness, is a best practice aimed at increasing transparency and reducing the risk of corruption in awarding of licenses.¹³ Model contracts are pre-written contracts with a few blanks to be filled in by the bidders (such as the name or names of the government's corporate partners in the agreement). Biddable items which are standard in such model contracts tend to include financial terms (i.e., how production -- and profits -- will be split between the government and companies) and work commitments (i.e., firm deadlines by which companies must either conduct exploration surveys or drill wells). Governments use work commitments to keep progress in the sector moving. In Lebanon's case, both financial terms and work commitments are biddable items in the model exploration and production sharing agreement.¹⁴

The 2010 law requires all bids to be received from a consortium of no less than three "right holders,"¹⁵ with right holder defined as a joint-stock company authorized to work in the oil and gas sector in Lebanon.¹⁶ Without directly using the specific terminology (which is used in the model exploration and production agreement), this legal requirement demands companies enter what is known in the industry as a Joint Operating Agreement (JOA) in order to bid. JOAs are "cornerstone contracts in the petroleum projects world" as they help companies spread the risk and cost of risky and costly projects.¹⁷ While LOGI found plenty of examples of countries that allow companies to bid alone or as part of a JOA, LOGI was unable to find statistics concerning how common it is for a country to stipulate that participants in a bid round must enter a JOA in order to bid.

There is no single model for a JOA, but under all JOAs, the partners choose one company among them to take the lead in conducting the technical work (like drilling, for example). The company in the lead role of a JOA is known in the industry as the "Operator,"¹⁸ while the other partners -- who are there to share risk and finance the project -- are known as "Non-Operators."

i. Operator roles and responsibilities:

The roles and responsibilities of Operators are defined in the OPRL and the relevant implementing decrees. In a 2013 presentation, the LPA summarized the Operator's roles as:

- "Managing the day-to-day field operations on behalf of other right holders," including, "design and [execution of] the exploration program," "well design, drilling, completion, production," "engineering, infrastructure and facilities construction and maintenance," "services and logistics," and representing the JOA partners.¹⁹

ii. Non-Operator roles and responsibilities:

Similarly, the roles of Non-Operators were described as follows:

- Participate on the management committee (which also has representatives of the LPA and the Ministry of Energy and Water²⁰) and assist in “co-financing the project,” “commercial and marketing activities,” “technical input, and “regulatory function” including “the power and duty to authorize and supervise.”²¹

Table 2: Roles and responsibilities of oil and gas companies under Lebanese law

<i>Oil and Gas Company Function</i>	<i>Roles and Responsibilities</i>
Operator	<ul style="list-style-type: none"> • Manage the day-to-day field operations on behalf of other right holders • Design and execute the exploration program • Well design, drilling, completion, production • Engineering, infrastructure and facilities construction and maintenance • Services and logistics
Non-operator	<ul style="list-style-type: none"> • Co-finance the project • Assist in commercial and marketing activities • Assist in technical input • Regulatory function • Power and duty to authorize and supervise the operator

Prior to entering a JOA and bidding, interested companies must receive authorization to engage in petroleum activities in Lebanon²². Authorization comes through the pre-qualification process.²³ The 2010 OPRL states that the pre-qualification criteria shall be set by the council of ministers based on a recommendation from the Minister of Energy and Water, itself based on the LPA's advice.²⁴ The law gives the LPA power to “[report] to the Minister about the assessment of qualifications and capabilities of applicants and applications for Petroleum Rights.”²⁵ The prequalification decree of 2013 states that, after receiving a recommendation of which companies pre-qualify and which do not from the LPA, the “Minister will make an announcement of the results of the prequalification process through the means he deems appropriate.”²⁶

c. Government criteria for prequalifying companies

The LPA used four criteria to evaluate applicants:

1. Legal
2. Financial
3. Technical and quality
4. Health, safety and environment (QHSE).

The evaluation methodology is outlined in Table 3. To meet legal requirements, companies had to prove they were incorporated for that purpose. To meet financial requirements, they had to prove they had total assets of a certain value threshold (the threshold is higher for operators than non-operators). To meet technical requirements, companies had to prove they had on-the-ground experience in the industry (again, with more robust requirements for operators than non-operators). And to meet QHSE requirements, they had to prove they had a written QHSE policy and a QHSE management system.

Table 3: Lebanese government pre-qualification criteria for oil and gas companies

Criteria	Description	Operator	Non-operator
Legal	Is the company legally authorized to explore for oil and gas?	Yes	Yes
Financial	Does the company have the capacity to finance a project?	≥\$10 billion in total assets	≥\$500 million in total assets
Technical	Does the company have oil and gas experience?	At least one petroleum development in water depths >500 meters	Established petroleum production (on- or offshore)
Quality, health, safety and environment (QHSE)	Does the company have a policy and management system in place?	Yes	Yes

In 2013, 46 corporate entities were pre-qualified to bid. Twelve of them pre-qualified as operators, and 34 as non-operators. In 2017, a second pre-qualification round was held resulting in one of the non-operators being upgraded to operator, while six new companies were pre-qualified as non-operators.²⁷

d. A concerning loophole in pre-qualification

Holding a pre-qualification round, publishing the criteria for pre-qualification and publishing the results are in line with international best practices, according to Global Witness and other organizations.²⁸ However, the Lebanese pre-qualification decree arguably opens a window for potential corruption risk. Article 3.3 of the decree states that applicants seeking pre-qualification “may be either one company or a group of companies at least one of which must prove that it is able to meet the pre-qualification eligibility criteria set forth in the present Decree.”²⁹ LOGI was unable to find statistics on how common this practice is in the industry and the pre-qualification decree seems to close the loophole present in article 3.3 with article 7.4, which states: “Any applicant whose qualifications, as evidenced by the information and documents provided by it, do not as a minimum meet the criteria set forth in the Annexes to this Decree may not be prequalified to participate in the licensing round.”³⁰

On the one hand, article 3.3 could help in building local capacity by allowing newly formed local companies to participate in the sector with the aim of growing into industry players.

On the other hand, it could allow for the creation of shell companies with unknown ownership, raising the risk of corruption whereby individuals in positions of authority and influence could surreptitiously participate in the sector and use their power to steer contracts toward one entity as opposed to another.

The corruption risk is mitigated, however, by a few factors:

1. All partners in a JOA are required to co-finance exploration projects, meaning that if one JOA partner is a joint venture pre-qualified under article 3.3, the “unqualified” member of this group is still required to invest in the project and risks losing that investment should no commercially recoverable resources be found. There are no rules concerning each JOA partner’s maximum or minimum contribution to financing a project.
2. The model exploration and production agreement states that if a contract is signed with JOA partners that include a joint venture pre-qualified under article 3.3, JV partners must establish a joint-stock company with the “qualified” partner retaining 51 percent ownership (and hence decision-making power for the JV) of the venture until the end of the exploration period³¹ (i.e., 3 years from contract signature).³²

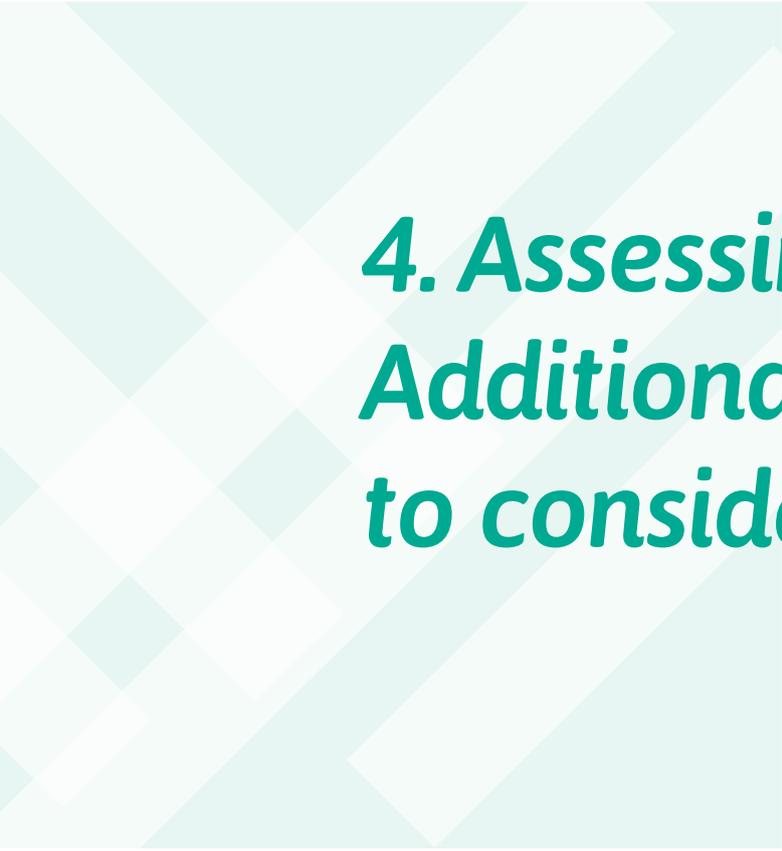
3- According to 2010 comments made by Lebanese Parliament Member Mohammad Kabbani -- a member of the legislature's Energy committee -- the logic behind demanding bidders enter a JOA is so they "supervise themselves" and "control each other," This means that for one partner in a JOA to engage in corruption, all other partners would have to be on board, thereby in theory, reducing the corruption risk.³³

In the 2013 pre-qualification round, three joint ventures made use of article 3.3 to prequalify. However, between 2013 and 2017, one of those joint ventures dissolved,³⁴ leaving only two joint ventures pre-qualified today:

- Bermuda-based GeoPark Holdings Limited partnered with Lebanon's Petroleb.
- UAE-based Crescent Petroleum partnered with Apex Oil and Gas Limited.







4. Assessing companies: Additional criteria to consider

4. ASSESSING COMPANIES: ADDITIONAL CRITERIA TO CONSIDER

The current pre-qualification criteria do not fully address the answers to two important questions about the companies:

- Were they involved in any corruption activities?
- Were they involved in any instances where environmental damage was caused (and hence could they cause damage to Lebanon's environment?)

These are the questions LOGI believes the Lebanese government – and all of Lebanon's citizens – should be asking. Therefore, LOGI decided to research and analyze the pre-qualified companies in an attempt to answer these important questions. To do so, we reviewed the overall industry landscape with a focus on evaluating companies based on track records of corruption and environmental damage. After extensive research, described below in the Methodology section, LOGI settled on five criteria – three related to corruption and two related to environmental considerations – by which to evaluate the companies pre-qualified in Lebanon (see chart below) for corruption and environmental risk.

Table 4: Additional criteria to assess companies bidding for Lebanon's oil and gas licensing round

<i>Evaluation themes</i>	<i>Evaluation criteria</i>	<i>Question asked</i>
Corruption	Company ownership	Who owns the company?
	Corruption history	Has the company been accused of corrupt practices?
	Anti-corruption policy	Does the company publish an anti-corruption policy?
	Home-country transparency measures	Does the company's country of registration have a whistleblower protection law? An access to information law? Is the country an EITI member?
Environment	Industry-specific environmental reporting	Does the company produce an industry-specific sustainability report?
	Environmental track record	Has the company been responsible for a large offshore spill or leak?



5. Methodology: How do we assess pre-qualified companies?

5. METHODOLOGY: HOW DO WE ASSESS PRE-QUALIFIED COMPANIES?

Slightly more than 100 years after the advent of the oil and gas industry, the general assembly of the United Nations recognized the “right of peoples and nations to permanent sovereignty over their natural wealth and resources” via resolution 1803.³⁵ Part of the rationale behind the resolution was “promoting the economic development of developing countries and securing their economic independence.”³⁶ That was in 1962. In the 55 years since the resolution passed, many developing countries rich in natural resources remain generally poor with high levels of perceived corruption. However, momentum has gained internationally behind several ideas aimed at maximizing the benefit of natural resources for the individual citizens of the states with sovereignty over them.

Transparency is a key component in helping to ensure resource wealth is shared by all. Prior to resource discovery, Non-Governmental Organization Global Witness argues that the process by which governments allocated exploration and production licenses should be transparent (meaning that governments should not be allowed to simply choose license winners without explaining to citizens how the choice was made). Once licenses are given and revenues begin flowing from resource sales, companies are increasingly expected to disclose project-by-project payments to governments. This push comes largely from civil society³⁷, particularly groups like Publish What You Pay, and has resulted in the Extractive Industries Transparency Initiative, a voluntary standard host countries (and the home countries where oil and gas companies are registered) can join to promote local revenue transparency in the sector.³⁸ International legislation such as the 1977 US Foreign Corrupt Practices Act (FPCA) and the UK’s 2010 Bribery Act are important tools that can hold companies to account for engaging in corrupt practices in countries with weak judicial systems. The FPCA applies to any company offering securities on a US stock exchange (which includes many of the world’s largest oil and gas companies). The Bribery Act applies to any company registered or operating in the United Kingdom (which again includes many oil and gas companies given the UK’s oil and gas reserves).³⁹

Transparency however, is not only related to revenues. Oil and gas companies are also increasingly requested to disclose a host of environmental data (from greenhouse gas emissions to oil spills, gas leaks and project-related waste management) as well as information on how operations benefit citizens of host countries (whether via direct employment or financing training centers to boost skills in the local labor force). For more than 10 years now, industry associations have been developing voluntary and industry-specific “sustainability reports” aimed at providing information on “environmental performance, health and safety performance, and social and economic performance.”⁴⁰

Social performance is arguably the hardest of these factors to measure, but since the 1970s, governments have been imposing targets on companies through what are known as “local content policies.” Such policies are aimed at requiring foreign oil and gas companies to engage locally in areas ranging from recruitment, procurement and other related services. In Lebanon’s case, the model exploration and production contract requires oil and gas companies working in-country, to hire 80 percent of the staff from Lebanon. Additionally, the contract imposes preference for local sourcing, provided local goods and services are of equal quality to what foreign companies can provide. This preference states that oil and gas companies should opt for local services even if they are 10 percent more expensive than the foreign equivalent and for local goods even if they are 5 percent more expensive.⁴¹

a. Disclaimer on the methodology

The company names used in the tables of this report were those published by the LPA. In some instances, well-known companies are listed by the name of the parent (France’s Total S.A. and Norway’s Statoil ASA). In some instances, the names of wholly-owned subsidiaries are used (Chevron Eastern Mediterranean Exploration and Production Limited representing the US-based Chevron, for example). Oil and gas companies regularly create wholly-owned subsidiaries to work on specific projects, in specific countries, in specific regions or any variety of them all (a US-based company may have a subsidiary for Asia that owns a subsidiary for Vietnam which three subsidiaries, each working on a separate field in the country). Lebanon’s model exploration and production sharing contracts require all companies that sign contracts with the Lebanese government to have unlimited parent company guarantees (meaning the parent company cannot skip on the subsidiary’s tax bill or avoid paying high costs for oil-spill clean-up). LOGI evaluated the parent company of pre-qualified applicants listed below.

LOGI did not re-evaluate companies based on the government’s criteria. Rather, LOGI expanded on the state’s criteria and evaluated companies based on track records of corruption and environmental damage. LOGI has made every effort to make this evaluation as fair and comprehensive as possible. The limits we put on information collection were done in the interest of time and available resources. We may have missed something and regret any omissions.

Table 5: Evaluation criteria with data source description

<i>Evaluation Themes</i>	<i>Evaluation Criteria</i>	<i>Question Asked</i>	<i>Source of Data</i>
Corruption	Company ownership	Who owns the company?	<ul style="list-style-type: none"> • Stock exchange disclosures. • Company annual reports. • Notes to company consolidated financial statements
	Corruption history	Has the company been accused of corrupt practices?	<ul style="list-style-type: none"> • US Securities and Exchange Commission's foreign corrupt practices act legal actions • US Department of Justice's foreign corrupt practices act legal actions • 2016 Company disclosures in annual reports and notes to company consolidated financial statements
	Anti-corruption policy	Does the company publish an anti-corruption policy on its website?	<ul style="list-style-type: none"> • Company website
	Home-country transparency measures	Does the company's country of registration have a whistleblower protection law? An access to information law? Is the country an EITI member?	<ul style="list-style-type: none"> • Internet research
Environmental	Industry-specific environmental reporting	Does the company produce an industry-specific sustainability report?	<ul style="list-style-type: none"> • Company website
	Environmental track record	Has the company been responsible for a large offshore spill or leak?	<ul style="list-style-type: none"> • Database of Center of Documentation, Research and Experimentation on Accidental Water Pollution

b. Corruption-related criteria

The government's criteria for pre-qualification (see above) did not account for corruption risk, nor did it take into account companies' environmental track records. LOGI wanted to know more about the 52 companies pre-qualified to bid in Lebanon's first offshore round based on these criteria.

i. Company ownership

After extensive research into both corruption in the oil and gas industry as well as the environmental track records of the 52 companies pre-qualified to bid in Lebanon's first offshore licensing round, we concluded that the main corruption risks are bribery and/or the hidden participation of politically exposed persons (i.e., government officials and their direct relatives) in the sector (as the undisclosed directors of a company that wins a contract, for example). Therefore, we decided first to find out the true owners of the pre-qualified companies.

Some companies disclose their beneficial owners, almost always because they're legally required to do so. If a company discloses its beneficial owners, the information is available in one of two places:

- The annual report or notes to the consolidated financial statements of companies listed on stock exchanges that require such disclosures
- The commercial registration papers of companies registered in jurisdictions that require such disclosures

A company's registration papers can be difficult to find as commercial registries are not always available in English, information is sometimes only available for a fee, and some countries do not require companies to disclose their beneficial owners in their registration papers. As a result of these challenges, LOGI opted to look only at disclosures on the companies' own websites in the form of annual reports and consolidated financial statements.

ii. Corruption history

Our research revealed two clear facts about corruption-related legal action in the oil and gas industry regarding corruption-related legal actions became clear:

1. Companies often settle cases without admitting or denying guilt, meaning that, from a legal perspective, if a company pays a settlement related to a corruption case, one cannot assume guilt on the company's part.
2. In two instances we found, companies were acquitted of bribery charges, as the accusations seemed to be politically motivated. Further, allegations sometimes surface in the press yet never end up resulting in legal action. Trace International, a US-based consultancy that maintains a database of corruption reports related to the oil and gas industry,⁴² was a valuable resource LOGI used to guide our research. However, the Trace database includes unsubstantiated press reports and does not link to original source documents (court filings, etc.). In the annex to this report where the companies are profiled in detail, LOGI identified which of Lebanon's pre-qualified companies appear in the Trace database.

To be fair and objective, LOGI relied on actions related to the US Foreign Corrupt Practices Act and companies' own self-reporting in 2016 to evaluate companies' track records on corruption allegations. We chose to look at FPCA actions because all related documents are public and easily accessible (as opposed to other legal actions, such as those related to the OECD convention against bribery, source documents for which are spread among many national legal databases). We chose self-reporting in 2016 because listed companies disclose some of the lawsuits they are party to in their annual reports and/or in the notes on their consolidated financial statements.

LOGI realizes that we may not have identified all corruption-related legal actions involving the companies pre-qualified in Lebanon and therefore we apologize if we missed any information.

iii. Anti-corruption policy

Corruption is a clear risk in the oil and gas industry. During research, LOGI encountered the concept of “responsible investing.” In the past decade, investors demanding social responsibility from companies has become more common. Financial advisory companies produce lists of “responsible” companies (which include O&G companies) based on a variety of metrics.

Reading through information these financial advisory companies provided to clients interested in investing in oil and gas companies, LOGI found guidance on corruption risk from the US-based financial firm Morgan Stanley:

“Minimizing the risk of exposure to bribery and corruption is vital for all companies. Implementing the correct policies and procedures are therefore important to help reduce [environmental, social and governance] risks although it is almost impossible to know how well companies follow their own policies. However, a good start is to look at which policies and initiatives the company publicly agrees to follow.”⁴³

As LOGI was unable to find a more robust standard by which to judge companies based on their commitment to fighting bribery and corruption, we chose to include whether companies publish anti-corruption policies as part of our criteria for evaluation.

iv. Home-country transparency measures

The 52 companies pre-qualified in Lebanon's first offshore licensing round are registered in a total of 29 different countries. LOGI wanted to know a bit more about the anti-corruption environment in companies' home countries as stronger anti-corruption laws and processes in companies' home countries could provide another route for remedy should one be needed. Therefore, we looked to see how many of these 29 countries (1) have a whistleblower protection law; (2) have an access to information law and (3) are members of the Extractive Industries Transparency Index (EITI).

Our data was accessed on the internet from reliable sources including but not limited to government websites, institutions such as the Organization for Economic Co-operation and Development and the Organization for Security Co-operation in Europe and non-governmental organizations like Transparency International. The full list of sources for this data is available in Annex B.

c. Sustainability criteria

Given the global nature of the oil and gas industry, attempting to make a fair comparison of oil and gas companies based on their environmental records proved difficult.

First and foremost, LOGI realized that most oil spills and gas leaks go largely unreported. Small oil spills are quite common for large companies operating in many jurisdictions (to take one example, Italy's ENI self-reported 82 oil spills of more than one barrel in 2016, spilling a total of 1,159 barrels during the year despite investing 21 million euro into spill prevention in 2016⁴⁴).

Natural gas leaks are even more common, and are known in the industry as "fugitive emissions." Moreover, natural gas leaks are frequently initiated on purpose to relieve pressure from a producing well to avoid an accident (such a purposeful leak is referred to as "venting" in the industry). These leaks are harmful to the environment given that natural gas is almost entirely methane, which traps more heat in earth's atmosphere than carbon dioxide.

All of this is to say that no repository of global oil spills and gas leaks exists and trying to find detailed information on each company's record proved nearly impossible. However, there is a trend in the industry toward voluntary "sustainability reporting." Many companies publish "sustainability reports" or include promotional information on their websites about their sustainable activities; however, the disclosed data in these reports does not follow a standardized format.

i. Industry-specific environmental reporting

For the oil and gas industry, there are two industry-specific standards for sustainability reports: those set by the Global Reporting Initiative (GRI)⁴⁵, an independent association that has been promoting sustainability performance reporting for all types of companies since 1997; and those set by jointly by the International Petroleum Industry Environmental Conservation Association (IPIECA), International Association of Oil and Gas Producers (OGP) and American Petroleum Institute (API). GRI is an evolving standard, and not all of its iterations are specifically tailored to the oil and gas industry, meaning some oil and gas companies report based on a GRI standard not specified for the industry.

In oil and gas exploration and production, companies often engage in an activity known as venting, meaning natural gas (which is almost entirely made of methane) is released directly into the atmosphere. Venting is a common method of reducing pressure while extracting oil and gas to avoid larger accidents (such as explosions), but methane is a far “worse” greenhouse gas when compared to carbon dioxide (meaning methane contributes to trapping more heat in the earth’s atmosphere than carbon dioxide and therefore does more environmental damage). Methane also escapes from the system during oil and gas production. These leaks are referred to as “fugitive emissions” in the industry. The oil and gas industry is also closely associated with oil spills. Both the industry-specific GRI reporting standards and those set by the IPIECA require companies to report on volumes of methane emissions specifically (as opposed to not reporting specific methane emissions and including methane emissions without naming them by reporting equivalent carbon dioxide emissions) as well as the number and volume of oil spills per year.

LOGI found that some companies produce “sustainability reports” that follow no standard and are often filled with promotional materials and very few numbers, others follow the GRI standard and others follow the industry-specific standard. Based on all of this, we chose to evaluate companies based on whether or not they produced sustainability reports based on industry-specific standards (whether they adhere to GRI or IPIECA standards).

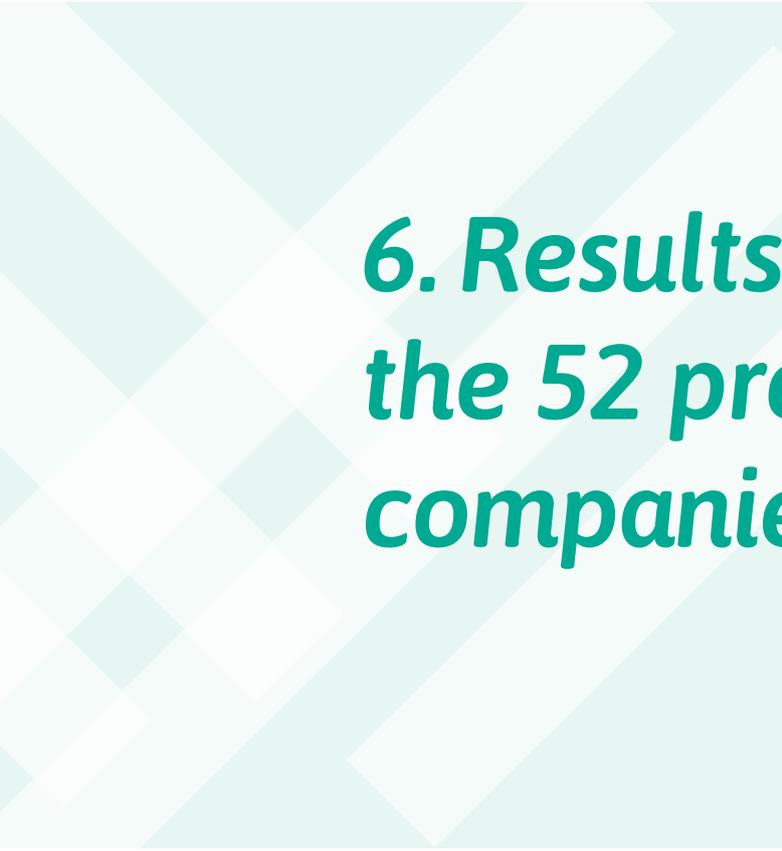
Table 6: Value of industry-specific reports

Standards-based sustainability reports	Oil spills	Methane emissions
Non-industry specific	<ul style="list-style-type: none"> • No reporting 	<ul style="list-style-type: none"> • No specific reporting
Industry-specific (following either Global Reporting Initiative (GRI) standards or those set by the International Petroleum Industry Environmental Conservation Association (IPIECA), International Association of Oil and Gas Producers (OGP) and American Petroleum Institute (API))	<ul style="list-style-type: none"> • Number of oil spills per year • Volume of oil spilt per year 	<ul style="list-style-type: none"> • Annual methane emissions that result from venting and fugitive emissions

ii. Environmental track record

As noted above, oil spills and gas leaks are common in the industry. LOGI found information on large-scale, offshore oil spills or gas leaks published by the Center of Documentation, Research and Experimentation on Accidental Water Pollution, a non-profit association registered and based in France.⁴⁶





6. Results: Profiling the 52 pre-qualified companies

6. RESULTS: PROFILING THE 52 PRE-QUALIFIED COMPANIES

a. Companies by role

Lebanon held two pre-qualification rounds for the first offshore licensing round. One was conducted in 2013, the other conducted in 2017.

In 2013, the Minister of Energy and Water announced which companies applied for pre-qualification. When announcing the results, the Minister (Gebran Bassil, at the time) named the operators who successfully pre-qualified, and he also noted that four companies – which he did not name – did not pre-qualify, for reasons he detailed. He did the same for non-operators, naming the successful applicants and explaining the reasons why unsuccessful candidates did not pre-qualify, without naming them.⁴⁷

In 2017, the pre-qualification process was slightly different. After the deadline for applications had passed, but prior to announcing results, the Minister of Energy (Cesar Abi Khalil, at the time) published a list of 9 companies and “Groups of Companies”⁴⁸ that had applied to pre-qualify. When the Minister announced the results, he did not explain why some of the earlier named applicants had been unsuccessful.

Additionally, one pre-qualified company – New Age (African Global Energy) LTD – was not on the original list of applicants that was disclosed by the minister of Energy and Water upon the closure of the second pre-qualification round⁴⁹. New Age, which does not disclose its beneficial owners, appeared however on the final list of pre-qualified companies that was disclosed by the minister on April 26th⁵⁰ during the press conference. No official explanation was offered for this anomaly. Such practice is marked as a red flag in NRCI’s report entitled “12 Red Flags: Corruption Risks in the Award of Extractive Sector Licenses and Contracts”⁵¹. While we do not want to presume that this is an indicator of any potential corruption, we would like to ask the Lebanese government to present official documentation that explains why the inclusion of this company occurred. Finally, when announcing the results, the Minister said that Lukoil had pre-qualified as a non-operator, yet the company qualified as a non-operator in 2013.

In total, in 2017, 6 companies that had not pre-qualified in 2013 became pre-qualified as non-operators; one company that pre-qualified in 2013 as a non-operator upgraded its status to operator; and one pre-qualified applicant from 2013 (a “Group of Companies” composed of Russia’s Novatek and Russia’s GPB Global Resources) lost its pre-qualification status.⁵²

Table 7: Number of pre-qualified applicants in 2013 and 2017

<i>Number of pre-qualified companies</i>	2013	2017
Operator	12	1
Non-operator	34	6
Total:	46	51

Table 8: Operators

<i>Role</i>	<i>Company name</i>	<i>Country of incorporation</i>
Operator	Anadarko International O&G company	USA
	Chevron Eastern Mediterranean Exploration and Production Limited	USA
	Eni International BV	Italy
	ExxonMobil Exploration and Production Lebanon LTD	USA
	Inpex Corporation	Japan
	Maersk Olie og Gas A/S	Denmark
	ONGC Videsh Limited (OVL)	India
	Petrobras International Braspetro BV	Brazil
	Petronas Carigali SDN BHD	Malaysia
	Repsol Exploracion SA (REXSA)	Spain
	Shell Exploration and Production (LXV) N.V.	Netherlands
	Statoil ASA	Norway
	Total S.A.	France
Total: 13		

Table 9: Non-operators

Role	Company name	Country of incorporation
Non-operator	Cairn Energy Plc	Great Britain
	Cairn India Limited	India
	CC Energy Limited	Lebanon
	Crescent Petroleum Company International Limited ⁵³	UAE
	Crescent Petroleum Company International Limited & Apex Gas Limited	UAE/Hong Kong
	Dana Gas PJSC	UAE
	Dana Petroleum E&P Limited	Great Britain
	Dragon Oil	UAE
	Edison International SpA	Italy
	GDF Suez E&P International S.A.	France
	Genel Energy Plc	Jersey
	GeoPark Holdings Limited/Petroleb SAL	Bermuda/Lebanon
	Heritage Oil Plc	Great Britain
	INA-INDUSTRIJA NAFTE d.d	Croatia
	Japan Petroleum Exploration Corporation	Japan
	JSC Novatek	Russia
	JX Nippon Oil & Gas Exploration Corporation	Japan
	Korea Gas Corporation (KOGAS)	South Korea
Korea National Oil Company	South Korea	
Kuwait Foreign Petroleum Exploration Company	Kuwait	

Table 9: Non-operators (cont.)

Role	Company name	Country of incorporation
Non-operator	LUKOIL	Russia
	Marathon Oil	USA
	MDC Oil & Gas Holding Company LLC	UAE
	Mitsui E&P Middle East B.V.	Netherlands
	MOL Hungarian Oil and Gas Company Plc	Hungary
	New Age (African Global Energy) LTD	Jersey
	OMV AKTIENGESELLSCHAFT	Austria
	Petroceltic International Plc	Ireland
	Petropars	Island of Nevis
	PTT Exploration and Production Public Company Limited	Thailand
	Rosneft Oil Company	Russia
	Santos Limited	Australia
	Sapurakencana Energy Sdn Bhd	Malaysia
	SOCO International Plc	Great Britain
	Sonatrach International Petroleum Exploration and Production Corporation (SIPEX BVI)	Algeria
	Suncor Energy Inc.,	Canada
	Qatar Petroleum Limited	Qatar
Turkiye Petrolleri Anonim Ortakligi	Turkey	

Total: 39⁵⁴

b. Companies by corruption criteria

LOGI found that several of the 52 companies pre-qualified to bid in Lebanon's first offshore oil and gas licensing round have been subject to legal action related to corruption. While press reports and common perceptions might incline one to think the number would be higher, LOGI focused its search in an effort to weed out unfounded and politically motivated corruption allegations (examples of which we came across in the research). As a result of applying the above-described corruption criteria, LOGI found:

- 8 of the 52 companies pre-qualified in Lebanon have been involved in legal disputes related to corruption: Chevron, ENI, GDF Suez (Engie), MOL Hungarian Oil and Gas Company, Petrobras, Shell, Statoil, Total
- 3 admitted guilt in what is known as a “deferred prosecution agreement: Shell, Statoil and Total
- 1 was found not guilty during arbitration; MOL Hungarian Oil and Gas
- 2 reached settlements that did not involve admissions of guilt: Chevron and ENI
- 3 reported in their 2016 annual reports that they are involved in corruption-related litigation
- 15 do not publish beneficial ownership information
- 9 have no published anti-corruption policy

Additionally, two companies raised red flags:

i. APEX Oil and Gas Limited:

Apex Oil and Gas Ltd pre-qualified as part of the loophole in the pre-qualification process. The company is registered in Hong Kong with a “nominee” director and shareholders. Hong Kong allows for “nominee” services, meaning a person or persons can pay a third party to register a company in Hong Kong, and for an additional yearly fee, the third party will nominate people to be listed as the company's officers and shareholders. Nominee services are used to hide a company's true owners and officers. The owners of Apex Oil and Gas Limited are therefore unknown and unknowable. However, in 2014, the owners at the time identified themselves to Executive magazine as:

- Mahmoud Sidani, CEO of the Lebanese natural gas import & distribution company UniGaz.
- Mohamed Choucair, President of the Beirut and Mount Lebanon Chambers of Commerce.⁵⁵

ii. Petroleb:

According to documents retrieved from Lebanon's commercial registry, Petroleb was registered in Beirut in 2011 and its legal shareholders are:

- Salah Bashar Al Khayat
- Omar Bashar Al Khayat
- Bashar Mohamad Salah El Dine Al Khayat

The company describes itself as an oil and gas company, but it does not have exploration rights anywhere in the world, nor does it have any producing oil and gas assets. In a 2014 interview with Executive Magazine, one of the company's owners suggested local connections were what made it valuable to its qualified partner, GeoPark.⁵⁶

A guide to the following tables:

Our criteria ask yes or no questions. Sometimes "yes" is something positive, like disclosing beneficial ownership. Sometimes, however, "yes" is something negative, like having been involved in a large-scale offshore oil spill or gas leak. To make our table more quickly understandable, we have labeled positive answers in green and negative answers in orange (meaning for some questions yes is green, but for some its orange). Yellow, in the home-country transparency measures table, means data could not be found. Sources for all of our data are published in the annexes.

Table Legend

Positive Negative Information unavailable

Table 10: Companies rated by corruption criteria

Role	Company name	Beneficial ownership info available?	Anti-Corruption statement?	Legal action related to bribery?
Operator	Anadarko International O&G company	Positive	Positive	Positive
	Chevron Eastern Mediterranean Exploration and Production Limited	Positive	Positive	Negative
	Eni International BV	Positive	Positive	Negative
	ExxonMobil Exploration and Production Lebanon LTD	Positive	Positive	Positive
	Inpex Corporation	Negative	Positive	Positive
	Maersk Olie og Gas A/S	Positive	Positive	Positive

Table 10: Companies rated by corruption criteria (cont.)

Role	Company name	Beneficial ownership info available?	Anti-Corruption statement?	Legal action related to bribery?
Operator	ONGC Videsh Limited (OVL)			
	Petrobras International Braspetro BV			
	Petronas Carigali SDN BHD			
	Repsol Exploracion SA (REXSA)			
	Shell Exploration and Production (LXV) N.V.			
	Statoil ASA			
	Total S.A.			
non-Operator	Cairn Energy Plc			
	Cairn India Limited			
	CC Energy Limited			
	Crescent Petroleum Company International Limited ⁵⁷			
	Crescent Petroleum Company International Limited & Apex Gas Limited			
	Dana Gas PJSC			
	Dana Petroleum E&P Limited			
	Dragon Oil			
	Edison International SpA			
	GDF Suez E&P International S.A.			

Table 10: Companies rated by corruption criteria (cont.)

Role	Company name	Beneficial ownership info available?	Anti-Corruption statement?	Legal action related to bribery?
non-Operator	Genel Energy Plc			
	GeoPark Holdings Limited/Petroleb SAL (evaluation here being done on GeoPark) ⁵⁸			
	GeoPark Holdings Limited/Petroleb SAL (evaluation here being done on Petroleb)			
	Heritage Oil Plc			
	INA-INDUSTRIJA NAFTE d.d			
	Japan Petroleum Exploration Corporation			
	JSC Novatek			
	JX Nippon Oil & Gas Exploration Corporation			
	Korea Gas Corporation (KOGAS)			
	Korea National Oil Company			
	Kuwait Foreign Petroleum Exploration Company			
	LUKOIL			
	Marathon Oil			
	MDC Oil & Gas Holding Company LLC			
	Mitsui E&P Middle East B.V.			
	MOL Hungarian Oil & Gas Company Plc			
New Age (African Global Energy) LTD				

Table 10: Companies rated by corruption criteria (cont.)

Role	Company name	Beneficial ownership info available?	Anti-Corruption statement?	Legal action related to bribery?
non-Operator	OMV AKTIENGESELLSCHAFT			
	Petroceltic International Plc			
	Petropars			
	PTT Exploration and Production Public Company Limited			
	Rosneft Oil Company			
	Santos Limited			
	Sapurakencana Energy Sdn Bhd			
	SOCO International Plc			
	Sonatrach International Petroleum Exploration and Production Corporation (SIPEX BVI)			
	Suncor Energy Inc.			
	Qatar Petroleum Limited			
	Turkiye Petrolleri Anonim Ortakligi			

c. Home-country transparency measures

LOGI decided to look not only at the companies themselves, but also at their home jurisdictions to get a sense of the anti-corruption environment where they are registered. We looked at whether the home jurisdiction has a whistleblower protection law; whether the home jurisdiction has an access to information law and whether the home jurisdiction is a member of the Extractive Industries Transparency Initiative (EITI). The 52 companies pre-qualified to participate in Lebanon's first offshore licensing round come from 29 countries.

- 24 of the 29 are not EITI members
- 11 do not have a whistleblower protection law
- 2 do not have access to information laws (& for two, information to clearly answer this question could not be found)

Table 11: Companies rated by corruption criteria

Home countries	Whistleblower protection law	Access to information law	EITI member
USA	Positive	Positive	Positive
Italy	Negative	Positive	Negative
Japan	Positive	Positive	Negative
Denmark	Positive	Positive	Negative
Brazil	Negative	Positive	Negative
Malaysia	Positive	Negative	Negative
Spain	Negative	Positive	Negative
Netherlands	Positive	Positive	Negative
Norway	Positive	Positive	Positive
France	Positive	Positive	Negative
India	Positive	Positive	Negative
Great Britain	Positive	Positive	Positive

Table Legend

- Positive
- Negative
- Information unavailable

Table 11: Companies rated by corruption criteria (cont.)

<i>Home countries</i>	<i>Whistleblower protection law</i>	<i>Access to information law</i>	<i>EITI member</i>
Lebanon			
UAE			
Hong Kong			
Jersey			
Bermuda			
Croatia			
Russia			
South Korea			
Hungary			
Austria			
Ireland			
Thailand			
Australia			
Algeria			
Canada			
Turkey			
Qatar			
Kuwait			
St. Nevis Island			

d. Companies by environmental criteria

While individual company sustainability reports confirm LOGI's earlier assertion that small spills and leaks are a common industry occurrence, few of the companies pre-qualified in Lebanon have large-scale spills in their track records. Further, around half of them produce industry-specific sustainability reports. When evaluating the companies against our environmental criteria, LOGI found that:

- 3 of the 52 companies pre-qualified in Lebanon have been involved in large-scale offshore oil spills and/or gas leaks.
- 28 of the 52 companies do not publish industry-specific sustainability reports.

Table Legend

■ Positive ■ Negative ■ Information unavailable

Table 12: Companies rated by corruption criteria

Role	Company name	"Large" offshore spills	Sustainability report?
Operator	Anadarko International O&G company	Positive	Information unavailable
	Chevron Eastern Mediterranean Exploration & Production Limited	Positive	Positive
	Eni International BV	Positive	Positive
	ExxonMobil Exploration and Production Lebanon LTD	Negative	Positive
	Inpex Corporation	Positive	Positive
	Maersk Olie og Gas A/S	Positive	Positive
	ONGC Videsh Limited (OVL)	Positive	Positive
	Petrobras International Braspetro BV	Positive	Positive
	Petronas Carigali SDN BHD	Positive	Positive
	Repsol Exploracion SA (REXSA)	Positive	Positive
Shell Esporation and Production (LXV) N.V.	Positive	Positive	

Table 12: Companies rated by corruption criteria (cont.)

Role	Company name	"Large" offshore spills	Sustainability report?
Operator	Statoil ASA		
	Total S.A.		
Non-operator	Cairn Energy Plc		
	Cairn India Limited		
	CC Energy Limited		
	Crescent Petroleum Company International Limited ⁵⁹		
	Crescent Petroleum Company International Limited and APEX Gas Limited		
	Dana Gas PJSC		
	Dana Petroleum E&P Limited		
	Dragon Oil		
	Edison International SpA		
	GDF Suez E&P International S.A.		
	Genel Energy Plc		
	GeoPark Holdings Limited/Petroleb SAL ⁶⁰		
	GeoPark Holdings Limited/Petroleb SAL		
	Heritage Oil Plc		
	INA-INDUSTRIJA NAFTE d.d		
Japan Petroleum Exploration Corporation			

Table 12: Companies rated by corruption criteria (cont.)

Role	Company name	"Large" offshore spills	Sustainability report?
Non-operator	JSC Novatek		
	JX Nippon Oil & Gas Exploration Corporation		
	Korea Gas Corporation (KOGAS)		
	Korea National Oil Company		
	Kuwait Foreign Petroleum Exploration Company		
	LUKOIL		
	Marathon Oil		
	MDC Oil & Gas Holding Company LLC		
	Mitsui E&P Middle East B.V.		
	MOL Hungarian Oil and Gas Company Plc		
	New Age (African Global Energy) LTD		
	OMV AKTIENGESELLSCHAFT		
	Petroceltic International Plc		
	Petropars		
	PTT Exploration and Production Public Company Limited		
	Rosneft Oil Company		
	Santos Limited		
Sapurakencana Energy Sdn Bhd			

Table 12: Companies rated by corruption criteria (cont.)

Role	Company name	"Large" offshore spills	Sustainability report?
Non-operator	SOCO International Plc		
	Sonatrach International Petroleum Exploration and Production Corporation (SIPEX BVI)		
	Suncor Energy Inc		
	Qatar Petroleum Limited		
	Turkiye Petrolleri Anonim Ortakligi		

e. Full summary of findings table

After extensive research into how the industry operates and a review of global best practices concerning those operations, LOGI has concluded that corruption allegations and accidents are common in the oil and gas industry. This is a dangerous business, where workers are injured or killed and where oil spills and gas leaks can occur.

- 8 of the 52 companies pre-qualified in Lebanon have been involved in legal disputes related to corruption: Chevron, ENI, GDF Suez (Engie), MOL Hungarian Oil and Gas Company, Petrobras, Shell, Statoil, Total
- 3 admitted guilt in what is known as a "deferred prosecution agreement: Shell, Statoil and Total
- 1 was acquitted; MOL Hungarian Oil and Gas
- 2 reached settlements that did not involve admissions of guilt: Chevron and ENI
- 3 reported in their 2016 annual reports that they are targets of corruption-related litigation
- 15 do not publish beneficial ownership information





7. Conclusion & recommendations

7. CONCLUSION & RECOMMENDATIONS

As a country with no proven oil and/or gas reserves that has never drilled an offshore well, Lebanon had to achieve a balance between strict pre-qualification requirements and enticing companies to bid. The criteria the government used ensured that pre-qualified companies were established industry players, except for those pre-qualified as a “Group of Companies.” Adding additional criteria would have narrowed the pool of potential applicants. For example, if “no oil spills” were a criterion, none of the operators that publish industry-specific sustainability reports would have qualified (and it is safe to assume that the operators who do not publish sustainability reports also have operational spills similar to the other companies in their peer group).

Placing a barrier against companies convicted of corruption would not work well either as LOGI’s research revealed there are few corruption-related convictions in this sector, meaning companies that signed deferred prosecution agreements would be able to pre-qualify as the agreements mean they were never legally convicted. Using the signature of a deferred prosecution agreement as a criterion would disqualify some of the world’s largest oil and gas companies, which could impact the competitiveness of future licensing rounds.

For these reasons, LOGI recommends that Lebanon modify pre-qualification criteria for future licensing rounds. Moreover, we also recommend concrete ways Lebanon can mitigate corruption and environmental damage risks once the country signs exploration and production agreements.

Recommendations

The clear take-aways from LOGI’s research into the pre-qualified companies are that corruption and environmental damage risks in the oil and gas industry are very high, and all companies from the most well-known to those with limited or no publicly available information on their status, deserve monitoring and scrutiny to ensure compliance and transparency.

Moving forward with the current licensing round, LOGI has identified recommendations to help mitigate these risks as well as a recommendation related to implementing local content requirements.

On Corruption Risks

- LOGI recommends that the Lebanese Petroleum Administration addresses the issue around New Age prequalification for the second round by publishing documents that showcase that this company submitted its application prior to the deadline of the second prequalification round.
- LOGI recommends that Lebanon join and fully implement the EITI.
- LOGI recommends that the LPA and the government disclose the names of companies which bid on each block, provisional contract winners, and actual contract winners.

- LOGI recommends that the LPA and the government disclose any negotiations that took place with companies to select a final winner.
- LOGI recommends that the government address the discrepancy that currently exists between articles 3.3 and 7.4 of the pre-qualification decree
- LOGI recommends that any awarding of contracts under article 3.3 be closely monitored by the LPA and civil society to ensure that such right is not used inappropriately
- LOGI recommends that the government establish a requirement to disclose beneficial owners by law as soon as possible that employs a clear and broad definition for beneficial ownership
- LOGI recommends that the government develop a roadmap for implementing beneficial ownership reporting to ensure proper execution
- LOGI recommends that the government establish an independent oversight & monitoring mechanism for any negotiations between the Lebanese government and companies bidding in licensing rounds
- LOGI recommends that the government publish all signed contracts
- In reference to some companies not having an anti-corruption policy, LOGI recommends that a voluntary code of ethics be drawn for companies to sign prior to initiation of their activities in Lebanon.

On Environmental Risks

- LOGI recommends that the LPA demand oil and gas companies to conduct environmental impact assessments (EIAs) during the exploration phase of project life cycles as this is not required under the model contract, even if it is already required by Lebanese law. The contracts only call for EIAs after resources have been identified and appraised (i.e., prior to development and production). However, to best protect Lebanon's marine environment, EIAs should be conducted prior to any seismic surveying and prior to any exploration- or appraisal-well drilling.
- LOGI recommends that the LPA maintain a public database of equipment being used by companies working offshore as well as information on the maintenance of said equipment. Research for this project revealed that spills and leaks sometimes result from a lack of properly maintained equipment. A public database outlining maintenance schedules for equipment with indications of whether or not such maintenance was performed will help citizens and civil society keep a close eye on the process.

On Local Content Policies

LOGI's research identified certain advice for local content policies centered on government's need to approach such policies with a strategic vision and not simply set unrealistic quotas. Lebanon has three local content policies in its model exploration and production contract.

- LOGI recommends that the LPA/Minister of Energy and Water publish a strategic plan for implementing and evaluating the impact of local content policies
- LOGI recommends that the LPA/Minister of Energy and Water publish local content impact reports on a twice-yearly basis and create a monitoring and evaluation mechanism.

On Future Licensing Rounds

For future licensing rounds, our first recommendation is more disclosure. While the criteria used to pre-qualify bidders was minimal in terms of rating companies based on environmental, social and criminal records, the LPA collected at least some of that information from the bidders although it was not factored into the overall determination of whether or not a company ultimately pre-qualified. For example, to qualify on the quality, health, safety and environment front, companies only had to prove they have a health, safety and environment policy as well as a health, safety and environment management system. However, the LPA required each potential bidder to submit "QHSE record of material events for the previous three (3) years including oil spills, site fatalities and injuries, major fires and explosions, mechanical/structural failures, emissions and waste, and main remedial efforts."⁶²

- The Ministry of Energy and Water should publish reasons for companies' disqualification in future licensing rounds
- The LPA should collect and publish companies QHSE records as submitted in line with the criteria set out in the first licensing round.
- The LPA should demand companies submit a similar report -- to be published -- regarding outstanding litigation involving the company.
- The LPA should add the publication of anti-corruption policies as a criterion on which to pre-qualify future applicants
- The LPA should add publishing industry-specific Sustainability Reports as a criterion on which to pre-qualify future applicants





Annex A: Detailed Company Profiles

ANNEX A: DETAILED COMPANY PROFILES

Operators:

Anadarko International O&G Company

Country of Incorporation: USA

Corruption criteria:

- Anadarko discloses beneficial owners. Anadarko's beneficial owners are institutional investors.⁶³
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not report outstanding corruption-related litigation in its 2016 annual report.
- Anadarko publishes an anti-corruption policy.⁶⁴
- It does not appear in the TRACE corruption database.

Environmental criteria:

- Anadarko does not publish an industry-specific sustainability report.
- It does not have an entry in the Cedre database of large-scale, offshore oil spills and gas leaks.

Chevron Eastern Mediterranean Exploration and Production Limited

Country of Incorporation: USA

Corruption criteria:

- Chevron discloses beneficial owners. Chevron's beneficial owners are institutional investors.⁶⁵
- In 2007, the company settled corruption charges brought against it by the US Securities and Exchange Commission (SEC).⁶⁶
- The charges related to illegal kickback payments made to the Iraqi government in relation to the UN Oil for Food Program. Chevron paid \$30 million and did not admit or deny guilt.
- The company did not report outstanding corruption-related litigation in its 2016 annual report.

- Chevron publishes as anti-corruption policy.⁶⁷
- Chevron appears in the Trace corruption database.⁶⁸

Environmental criteria:

- Chevron publishes an industry-specific sustainability report.⁶⁹
- The Cedre database of large-scale, offshore oil spills and gas leaks did not have an entry for Chevron.

ENI International BV

Country of Incorporation: Italy

Corruption criteria:

- ENI discloses beneficial owners. ENI's beneficial owners are institutional investors and the Italian Ministry of Economy and Finance.⁷⁰
- In 2010, the company settled corruption charges brought against it by the US Securities and Exchange Commission (SEC).⁷¹ The charges related to a decades-long bribery scheme in Nigeria involving construction contracts.
- It did not report outstanding corruption-related litigation in its 2016 annual report.
- It publishes as anti-corruption policy.⁷²
- Eni does appear in the TRACE corruption database.⁷³

Environmental criteria:

- ENI publishes an industry-specific sustainability report.⁷⁴
- It does not have an entry in the Cedre database of large-scale, offshore oil spills and gas leaks.

ExxonMobil Exploration and Production Lebanon LTD

Country of Incorporation: USA

Corruption criteria:

- ExxonMobil discloses beneficial owners. The company's beneficial owners are institutional investors.⁷⁵
- ExxonMobil has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.

- It did not report outstanding corruption-related litigation in its 2016 annual report.
- It publishes as anti-corruption policy.⁷⁶
- It appears in the TRACE corruption database.⁷⁷

Environmental criteria:

- ExxonMobil publishes an industry-specific sustainability report.⁷⁸
- It has an entry in the Cedre database of large-scale, offshore oil spills and gas leaks.⁷⁹

Inpex Corporation

Country of Incorporation: Japan

Corruption criteria:

- Inpex does not disclose beneficial owners.
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- Inpex did not report outstanding corruption-related litigation in its 2016 annual report.
- It publishes as anti-corruption policy.⁸⁰
- Inpex does not appear in the TRACE corruption database.

Environmental criteria:

- Inpex publishes an industry-specific sustainability report.⁸¹
- It does not have an entry in the Cedre database of large-scale, offshore oil spills and gas leaks.

Maersk Olie og Gas A/S

Country of Incorporation: Denmark

Corruption criteria:

- Maersk does not disclose beneficial owners.
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not report outstanding corruption-related litigation in its 2016 annual report.

- Maersk has an anti-corruption policy statement on its website.⁸²
- Maersk appears in the TRACE corruption database.⁸³

Environmental criteria:

- Maersk publishes an industry-specific sustainability report.⁸⁴
- It does not have an entry in the Cedre database of large-scale, offshore oil spills and gas leaks.

ONGC Videsh Limited (OVL)

Country of Incorporation: India

Corruption criteria:

- OVL is the overseas arm of ONGC Videsh Limited, India's national oil company. OVL is owned by the Indian government.⁸⁵
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not report outstanding corruption-related litigation in its 2016 annual report.
- The company has an anti-corruption policy statement on its website.⁸⁶
- OVL and parent ONGC do not appear in the TRACE corruption database.

Environmental criteria:

- Parent company ONGC publishes an industry-specific sustainability report.⁸⁷
- It does not have an entry in the Cedre database of large-scale, offshore oil spills & gas leaks.

Petrobras International Braspetro BV

Country of Incorporation: Brazil

Corruption criteria:

- Petrobras discloses beneficial owners. The company is majority-owned by the Brazilian government.⁸⁸
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.

- It reported outstanding corruption-related litigation in its 2016 annual report related to an ongoing court case and scandal in Brazil in which top company officials are accused of accepting bribes from companies that overcharged Petrobras for their work.⁸⁹
- It has an anti-corruption policy statement on its website.⁹⁰
- Petrobras appears in the TRACE corruption database.⁹¹

Environmental criteria:

- Petrobras publishes an industry-specific sustainability report.⁹²
- It does not have an entry in the Cedre database of large-scale, offshore oil spills and gas leaks.

Petronas Carigali SDN BHD

Country of Incorporation: Malaysia

Corruption criteria:

- Petronas discloses beneficial owners.
- The company's beneficial owner is the government of Malaysia.⁹³
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not report outstanding corruption-related litigation in its 2016 annual report.
- It has an anti-corruption policy statement on its website.⁹⁴
- Petronas appears in the TRACE corruption database.⁹⁵

Environmental criteria:

- Petronas publishes an industry-specific sustainability report.⁹⁶
- It does not have an entry in the Cedre database of large-scale, offshore oil spills and gas leaks.

Repsol Exploracion SA (REXSA)

Country of Incorporation: Spain

Corruption criteria:

- Repsol discloses beneficial owners. Repsol's beneficial owners are institutional investors.⁹⁷
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not report outstanding corruption-related litigation in its 2016 annual report.
- Repsol has an anti-corruption policy statement on its website.⁹⁸
- It does not appear in the TRACE corruption database.

Environmental criteria:

- Repsol publishes an industry-specific sustainability report.⁹⁹
- It does not have an entry in the Cedre database of large-scale, offshore oil spills and gas leaks.

Shell Exploration and Production (LXV) N.V.

Country of Incorporation: Netherlands

Corruption criteria:

- Shell discloses beneficial owners. Shell's beneficial owners are institutional investors.¹⁰⁰
- In 2010, the company agreed to a deferred prosecution agreement with the US Department of Justice, admitting that a unit operating in Nigeria paid government officials bribes through a third party.¹⁰¹
- Shell reported outstanding corruption-related litigation in its 2016 annual report, but not in much detail, revealing only: "Authorities in various countries are investigating our investment in Nigerian oil block OPL 245 and the 2011 settlement of litigation pertaining to that block."¹⁰²
- Shell has an anti-corruption policy statement on its website.¹⁰³
- Shell appears in the TRACE corruption database.¹⁰⁴

Environmental criteria:

- Shell publishes an industry-specific sustainability report.¹⁰⁵
- It does not have an entry in the Cedre database of large-scale, offshore oil spills & gas leaks.

Statoil SA

Country of Incorporation: Norway

Corruption criteria:

- Statoil discloses beneficial owners. Statoil is majority-owned by the Norwegian government and other major shareholders are institutional investors.¹⁰⁶
- In 2006, the company agreed to a deferred prosecution agreement with the US Department of Justice, admitting it paid a consulting company bribes to win work in Iran.¹⁰⁷
- It did not report outstanding corruption-related litigation in its 2016 annual report.
- It has an anti-corruption policy statement on its website.¹⁰⁸
- Statoil appears in the TRACE corruption database.¹⁰⁹

Environmental criteria:

- Statoil publishes an industry-specific sustainability report.¹¹⁰
- In 2007, 4,000 cubic meters of crude oil spilled into the North Sea because of an accident on an offshore rig operated by Statoil as crude was being loaded into a tanker, according to the Cedre database of large-scale, offshore oil spills and gas leaks.¹¹¹

Total S.A.

Country of Incorporation: France

Corruption criteria:

- Total discloses beneficial owners. Total's beneficial owners are institutional investors and the group's employees.¹¹²
- In 2013, Total agreed to a deferred prosecution agreement with the US Department of Justice, admitting it paid a third party bribes for work in Iran.¹¹³
- The company did not report outstanding corruption-related litigation in its 2016 annual report.
- Total appears in the TRACE corruption database.¹¹⁴

Environmental criteria:

- Total publishes an industry-specific sustainability report.¹¹⁵
- In 2012, a well Total had plugged one year prior began to leak gas and condensate into the North Sea beneath a platform Total was operating, according to the Cedre database of large-scale, offshore oil spills and gas leaks.¹¹⁶ The amount of gas leaked and its impact on the sea is unknown, beyond the general knowledge that natural gas is mostly composed of methane, and methane has a more significant impact on warming earth's atmosphere than carbon dioxide.

Non-operators

Cairn Energy PLC

Country of Incorporation: Great Britain

Corruption criteria:

- Cairn discloses beneficial owners. Cairn's beneficial owners are institutional investors.¹¹⁷ The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not report outstanding corruption-related litigation in its 2016 annual report.
- Cairn has an anti-corruption policy statement on its website.¹¹⁸
- The company does not appear in the TRACE corruption database.

Environmental criteria:

- Cairn does not publish an industry-specific sustainability report.
- It does not have an entry in the Cedre database of large-scale, offshore oil spills and gas leaks.

Cairn India Limited

Country of Incorporation: India

Corruption criteria:

- Cairn India Limited discloses beneficial owners. Cairn India Limited's beneficial owners are institutional investors.¹¹⁹
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not report outstanding corruption-related litigation in its 2016 annual report.
- Cairn India Limited has an anti-corruption policy statement on its website.¹²⁰
- The company does not appear in the TRACE corruption database.

Environmental criteria:

- Cairn India Limited does not publish an industry-specific sustainability report.
- It does not have an entry in the Cedre database of large-scale, offshore oil spills & gas leaks.

CC Energy Limited

Country of Incorporation: Lebanon

Corruption criteria:

- CC Energy Limited does not disclose beneficial owners. Company records are available on the Lebanese Commercial Registry's website, and the majority shareholder (with a 99 percent stake) is registered in the British Virgin Islands.¹²¹
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It does not publish annual reports.
- CC Energy Limited does not publish an anti-corruption policy.
- It does not appear in the TRACE corruption database.

Environmental criteria:

- CC Energy Limited does not publish an industry-specific sustainability report.
- It does not have an entry in the Cedre database of large-scale, offshore oil spills & gas leaks.

Crescent Petroleum Company International Limited

Country of Incorporation: United Arab Emirates

Corruption criteria:

- Crescent does not disclose beneficial owners.
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It does not publish annual reports.
- It publishes an anti-corruption policy statement.¹²²
- Crescent does not appear in the TRACE corruption database.

Environmental criteria:

- Crescent publishes an industry-specific sustainability report.¹²³
- It does not have an entry in the Cedre database of large-scale, offshore oil spills and gas leaks.

Apex Gas Limited

Country of Incorporation: Hong Kong

Corruption criteria:

- Apex does not disclose beneficial owners, and does not have a website.
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It does not produce annual reports.
- It does not appear in the TRACE corruption database.

Environmental criteria:

- Apex does not publish an industry-specific sustainability report.
- It does not have an entry in the Cedre database of large-scale, offshore oil spills and gas leaks.

Dana Gas PJSC

Country of Incorporation: United Arab Emirates

Corruption criteria:

- Dana Gas does not disclose beneficial owners.
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not report outstanding corruption-related litigation in its 2016 annual report.
- It has an anti-corruption policy statement on its website.¹²⁴
- It does not appear in the TRACE corruption database.

Environmental criteria:

- Dana Gas publishes an industry-specific sustainability report.¹²⁵
- It does not have an entry in the Cedre database of large-scale, offshore oil spills and gas leaks.

Dana Petroleum E&P Limited

Country of Incorporation: Great Britain

Corruption criteria:

- Dana Petroleum discloses beneficial owners. Dana Petroleum is fully owned by South Korea's National Oil Company, Korea National Oil Company (KNOC), which is also pre-qualified as a non-operator in Lebanon.¹²⁶
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not report outstanding corruption-related litigation in its 2016 annual report.
- It does not publish an anti-corruption policy.
- Dana Petroleum not appear in the TRACE corruption database.

Environmental criteria:

- Dana Petroleum does not publish an industry-specific sustainability report.
- It does not have an entry in the Cedre database of large-scale, offshore oil spills & gas leaks.

Dragon Oil

Country of Incorporation: United Arab Emirates

Corruption criteria:

- Dragon Oil discloses beneficial owners. Dragon Oil is fully owned by Emirates National Oil Company.¹²⁷
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It does not publish an annual report.
- It publishes an anti-corruption policy.¹²⁸
- Dragon Oil does not appear in the TRACE corruption database.

Environmental criteria:

- Dragon Oil publishes an industry-specific sustainability report.¹²⁹
- It does not have an entry in the Cedre database of large-scale, offshore oil spills and gas leaks.

Edison International SpA

Country of Incorporation: Italy

Corruption criteria:

- Edison discloses beneficial owners. Edison nearly wholly owned by Electricite de France¹³⁰, a French utility.
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not report outstanding corruption-related litigation in its 2016 annual report.
- It has an anti-corruption policy statement on its website.¹³¹
- Edison does not appear in the TRACE corruption database.

Environmental criteria:

- Edison publishes an industry-specific sustainability report.¹³²
- It does not have an entry in the Cedre database of large-scale, offshore oil spills & gas leaks.

GDF Suez E&P International S.A.

Country of Incorporation: USA

Corruption criteria:

- Since prequalifying in 2013, GDF Suez E&P International S.A. has changed its name to Engie. Engie discloses beneficial owners. Engie's beneficial owners are institutional investors and the French government.¹³³
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- In its 2016 annual report, the company disclosed that employees in Spain were under criminal investigation regarding the awarding of contracts in the report called "the Punica case," without elaboration.¹³⁴
- Engie has an anti-corruption policy statement on its website.¹³⁵
- It does not appear in the TRACE corruption database.

Environmental criteria:

- Engie does publish an industry-specific sustainability report.¹³⁶
- It does not have an entry in the Cedre database of large-scale, offshore oil spills & gas leaks.

Genel Energy PLC

Country of Incorporation: Jersey

Corruption criteria:

- Genel Energy does not disclose beneficial owners.
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not report outstanding corruption-related litigation in its 2016 annual report.
- Genel has an anti-corruption policy statement on its website.¹³⁷
- The company does not appear in the TRACE corruption database.

Environmental criteria:

- Genel does not publish an industry-specific sustainability report.
- It does not have an entry in the Cedre database of large-scale, offshore oil spills and gas leaks.

GeoPark Holdings Limited/Petroleb SAL

Country of Incorporation: Bermuda

Corruption criteria:

- GeoPark Holdings Limited is pre-qualified as part of a joint-venture with Lebanon's Petroleb SAL (profiled below). As per the pre-qualification rules, GeoPark cannot join a consortium to bid alone, it can only join a consortium with Petroleb as a partner.
- GeoPark discloses beneficial owners. GeoPark's beneficial owners are private investors.¹³⁸
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not report outstanding corruption-related litigation in its 2016 annual report.
- GeoPark has an anti-corruption policy statement on its website.¹³⁹
- The company does not appear in the TRACE corruption database.

Environmental criteria:

- GeoPark does not publish an industry-specific sustainability report.
- It does not have an entry in the Cedre database of large-scale, offshore oil spills and gas leaks.

Petroleb SAL

Country of Incorporation: Lebanon

Corruption criteria:

- Petroleb does not disclose beneficial owners. Company records are available on the website of Lebanon's commercial registry.¹⁴⁰ The company's legal shareholders are three Lebanese nationals.
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.

- It does not produce an annual report.
- It does not publish an anti-corruption policy.
- Petroleb does not appear in the TRACE corruption database.

Environmental criteria:

- Petroleb does not publish an industry-specific sustainability report.
- It does not have an entry in the Cedre database of large-scale, offshore oil spills and gas leaks.

Heritage Oil PLC

Country of Incorporation: Great Britain

Corruption criteria:

- Heritage Oil does not disclose beneficial owners. In 2014, Al-Mirqab Capital bought Heritage and, according to Heritage's website, still owns the company.¹⁴¹ LOGI could not find any official records for Al-Mirqab Capital
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It does not produce an annual report.
- Heritage has an anti-corruption policy statement on its website.¹⁴²
- The company does not appear in the TRACE corruption database.

Environmental criteria:

- Heritage does not publish an industry-specific sustainability report.
- It does not have an entry in the Cedre database of large-scale, offshore oil spills and gas leaks.

INA-Industrija Nafte d.d.

Country of incorporation: Croatia

Corruption criteria:

- INA does disclose beneficial owners.
- It's beneficial owners are the Croatian government and Hungary's MOL Group, which also owns MOL Hungarian Oil and Gas Company Plc, another company pre-qualified to bid as a non-operator in Lebanon.¹⁴³
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It does not produce an annual report.
- Heritage has an anti-corruption policy statement on its website.¹⁴⁴
- The company appears in the TRACE corruption database.¹⁴⁵

Environmental criteria:

- INA publishes an industry-specific sustainability report.¹⁴⁶
- It does not have an entry in the Cedre database of large-scale, offshore oil spills & gas leaks.

Japan Petroleum Exploration Corporation

Country of Incorporation: Japan

Corruption criteria:

- Japan Petroleum Exploration Corporation discloses its beneficial owners.
- The company's beneficial owners are Japan's Minister of Economy, Trade and Industry as well as institutional investors.¹⁴⁷
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not report outstanding corruption-related litigation in its 2016 annual report.
- Japan Petroleum Exploration Company has an anti-corruption policy statement on its website.¹⁴⁸
- The company does not appear in the TRACE corruption database.

Environmental criteria:

- Japan Petroleum Exploration Corporation publishes an industry-specific sustainability report.¹⁴⁹
- It does not have an entry in the Cedre database of large-scale, offshore oil spills & gas leaks.

JSC Novatek

Country of Incorporation: Russia

Corruption criteria:

- Novatek does not disclose beneficial ownership.
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not disclose corruption-related litigation in its annual report.
- Novatek has an anti-corruption policy statement on its website.¹⁵⁰
- The company does not appear in the TRACE corruption database.

Environmental criteria:

- Novatek publishes an industry-specific sustainability report.¹⁵¹
- It does not have an entry in the Cedre database of large-scale, offshore oil spills & gas leaks.

JX Nippon Oil & Gas Exploration Corporation

Country of Incorporation: Japan

Corruption criteria:

- Nippon discloses beneficial ownership.
- The company's beneficial owners are institutional investors.¹⁵²
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not disclose corruption-related litigation in its annual report.
- Nippon has an anti-corruption policy statement on its website.¹⁵³
- The company does not appear in the TRACE corruption database.

Environmental criteria:

- Nippon does not publish an industry-specific sustainability report.
- It does not have an entry in the Cedre database of large-scale, offshore oil spills & gas leaks.

Korea Gas Corporation (KOGAS)

Country of Incorporation: South Korea

Corruption criteria:

- KOGAS discloses beneficial ownership.
- The company's beneficial owner is the South Korean government.¹⁵⁴
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not disclose corruption-related litigation in its annual report.
- KOGAS does not publish an anti-corruption policy statement on its website.
- The company does not appear in the TRACE corruption database.

Environmental criteria:

- KOGAS publishes an industry-specific sustainability report.¹⁵⁵
- It does not have an entry in the Cedre database of large-scale, offshore oil spills & gas leaks.

Korea National Oil Company

Country of Incorporation: South Korea

Corruption criteria:

- Korean National Oil Company discloses beneficial ownership.
- The company's beneficial owner is the South Korean government.¹⁵⁶
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not disclose corruption-related litigation in its annual report.
- Korean National Oil Company has an anti-corruption policy statement on its website.¹⁵⁷
- The company does not appear in the TRACE corruption database.

Environmental criteria:

- Nippon does not publish an industry-specific sustainability report.
- It does not have an entry in the Cedre database of large-scale, offshore oil spills & gas leaks.

Kuwait Foreign Petroleum Exploration Company K.S.C.

Country of Incorporation: Kuwait

Corruption criteria:

- KUFPEC discloses beneficial ownership.
- The company's beneficial owner is the Kuwaiti government.¹⁵⁸
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not disclose corruption-related litigation in its annual report.
- KUFPEC does not publish an anti-corruption policy.
- The company does not appear in the TRACE corruption database.

Environmental criteria:

- KUFPEC does not publish an industry-specific sustainability report.
- It does not have an entry in the Cedre database of large-scale, offshore oil spills & gas leaks.

Marathon Oil

Country of Incorporation: USA

Corruption criteria:

- Marathon discloses beneficial ownership.
- The company's beneficial owners are institutional investors.¹⁵⁹
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not disclose corruption-related litigation in its annual report.
- Marathon has an anti-corruption policy statement on its website.¹⁶⁰
- The company appears in the TRACE corruption database.¹⁶¹

Environmental criteria:

- Marathon publishes an industry-specific sustainability report.¹⁶²
- It does not have an entry in the Cedre database of large-scale, offshore oil spills & gas leaks.

MDC Oil & Gas Holding Company LLC

Country of Incorporation: United Arab Emirates

Corruption criteria:

- MDC does not beneficial ownership.
- The company is a wholly-owned subsidiary of Mubadala Investment Company.¹⁶³
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not disclose corruption-related litigation in its annual report.
- MDC does not publish an anti-corruption policy.
- The company does not appear in the TRACE corruption database.

Environmental criteria:

- MDC does not publish an industry-specific sustainability report.
- It does not have an entry in the Cedre database of large-scale, offshore oil spills & gas leaks.

Mitsu E&P Middle East B.V.

Country of Incorporation: Japan

Corruption criteria:

- Mitsu discloses beneficial ownership.
- The company's beneficial owners are institutional investors.¹⁶⁴
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not disclose corruption-related litigation in its annual report.
- Mitsu does publish an anti-corruption policy.¹⁶⁵
- The company does not appear in the TRACE corruption database.

Environmental criteria:

- Mitsu does not publish an industry-specific sustainability report.
- It does not have an entry in the Cedre database of large-scale, offshore oil spills and gas leaks.

MOL Hungarian Oil and Gas Company Plc

Country of Incorporation: Hungary

Corruption criteria:

- MOL discloses beneficial ownership.
- The company's beneficial owners the Hungarian government and institutional investors.¹⁶⁶
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It discloses corruption-related litigation in its annual report.¹⁶⁷ The Croatia government had accused MOL of bribing a former Croatian prime minister to gain “management control” over INA-Industrija (which MOL and the Croatia government both own more than 40 percent of). An arbitrator's decision found MOL not guilty, but the company says in its annual report that Croatia is attempting to appeal the decision.
- MOL does publish an anti-corruption policy.¹⁶⁸
- The company does not appear in the TRACE corruption database.

Environmental criteria:

- MOL publishes an industry-specific sustainability report.¹⁶⁹
- It does not have an entry in the Cedre database of large-scale, offshore oil spills and gas leaks.

New Age (African Global Energy) LTD

Country of Incorporation: Jersey¹⁷⁰

Corruption criteria:

- New Age does not disclose beneficial ownership.
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not disclose corruption-related litigation in its annual report.
- New Age does not publish an anti-corruption policy.
- The company does not appear in the TRACE corruption database.

Environmental criteria:

- New Age does not publish an industry-specific sustainability report.
- It does not have an entry in the Cedre database of large-scale, offshore oil spills & gas leaks.

OMV AKTIENGESELLSCHAFT

Country of Incorporation: Austria

Corruption criteria:

- OMV discloses beneficial ownership.
- The company's beneficial owners are the Austrian government & institutional investors.¹⁷¹
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not disclose corruption-related litigation in its annual report.
- OMV publishes an anti-corruption policy.¹⁷²
- The company does not appear in the TRACE corruption database.

Environmental criteria:

- OMV publishes an industry-specific sustainability report.¹⁷³
- It does not have an entry in the Cedre database of large-scale, offshore oil spills & gas leaks.

Petropars

Country of Incorporation: St Nevis Island

Corruption criteria:

- Petropars discloses beneficial ownership.
- The company's beneficial owner is the Iranian government.¹⁷⁴
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not disclose corruption-related litigation in its annual report.
- Petropars does not publish an anti-corruption policy.
- The company does not appear in the TRACE corruption database.

Environmental criteria:

- Petropars does not publish an industry-specific sustainability report.
- It does not have an entry in the Cedre database of large-scale, offshore oil spills & gas leaks.

Petroceltic International PLC

Country of Incorporation: Ireland

Corruption criteria:

- In 2016, Worldview Capital, a private investment company registered in the Cayman Islands,¹⁷⁵ bought Petroceltic.¹⁷⁶ Worldview does not disclose beneficial owners.
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not disclose corruption-related litigation in its annual report.
- Petroceltic does not publish an anti-corruption policy.
- The company does not appear in the TRACE corruption database.

Environmental criteria:

- Petroceltic does not publish an industry-specific sustainability report.
- It does not have an entry in the Cedre database of large-scale, offshore oil spills & gas leaks.

PJSC Lukoil

Country of Incorporation: Russia

Corruption criteria:

- Lukoil discloses beneficial ownership.
- The company's beneficial owners are Institutional investors.¹⁷⁷
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not disclose corruption-related litigation in its annual report.
- Lukoil does not publish an anti-corruption policy.
- The company does not appear in the TRACE corruption database.

Environmental criteria:

- Lukoil publishes an industry-specific sustainability report.¹⁷⁸
- It does not have an entry in the Cedre database of large-scale, offshore oil spills and gas leaks.

PTT Exploration and Production Public Company Limited

Country of Incorporation: Thailand

Corruption criteria:

- PTTEP discloses beneficial owners.
- The company's beneficial owners are the Thai government and institutional investors.¹⁷⁹
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not disclose corruption-related litigation in its annual report.
- PTTEP does publish an anti-corruption policy.¹⁸⁰
- The company does not appear in the TRACE corruption database.

Environmental criteria:

- Petroceltic does not publish an industry-specific sustainability report.
- In 2009, a drill rig operated by a company owned by PTTEP in Australia began leaking. The cause of the leak is unclear, but approximately 4,800 tonnes of crude spilled into the Timor sea as a result, according to the Cedre database of large-scale, offshore oil spills and gas leaks.¹⁸¹

Rosneft Oil Company

Country of Incorporation: Russia

Corruption criteria:

- Rosneft discloses beneficial owners.
- The company's beneficial owners are the Russian government & institutional investors.¹⁸²
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not disclose corruption-related litigation in its annual report.
- Rosneft publishes an anti-corruption policy.¹⁸³
- The company does not appear in the TRACE corruption database.

Environmental criteria:

- Rosneft publishes an industry-specific sustainability report.¹⁸⁴
- It does not have an entry in the Cedre database of large-scale, offshore oil spills and gas leaks.

Santos Limited

Country of Incorporation: Australia

Corruption criteria:

- Santos discloses beneficial owners.
- The company's beneficial owners are institutional investors.¹⁸⁵
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.

- It did not disclose corruption-related litigation in its annual report.
- Santos publishes an anti-corruption policy.¹⁸⁶
- The company does not appear in the TRACE corruption database.

Environmental criteria:

- Santos does not publish an industry-specific sustainability report.
- It does not have an entry in the Cedre database of large-scale, offshore oil spills & gas leaks.

Sapurakencana Energy Sdn Bhd

Country of Incorporation: Malaysia

Corruption criteria:

- Sapurakencana discloses beneficial owners.
- The company's beneficial owners are institutional investors.¹⁸⁷
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not disclose corruption-related litigation in its annual report.
- Sapurakencana publishes an anti-corruption policy.¹⁸⁸
- The company does not appear in the TRACE corruption database.

Environmental criteria:

- Sapurakencana does not publish an industry-specific sustainability report.
- It does not have an entry in the Cedre database of large-scale, offshore oil spills & gas leaks.

Soco International Plc

Country of Incorporation: Great Britain

Corruption criteria:

- Soco does not disclose beneficial owners, but it does disclose the holdings of its directors, one of whom is Rui de Sousa. De Sousa is a shareholder in several Lebanese companies. One of his frequent business partners is Sami Maroun. Maroun and De Sousa both own shares in the following companies registered in Lebanon: Sauri Holding,¹⁸⁹ Gaz Invest Financial Holding SAL,¹⁹⁰ and Quantic Oil Co SAL.¹⁹¹

- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not disclose corruption-related litigation in its annual report.
- Soco publishes an anti-corruption policy.¹⁹²
- The company does not appear in the TRACE corruption database.

Environmental criteria:

- Soco does not publish an industry-specific sustainability report.
- It does not have an entry in the Cedre database of large-scale, offshore oil spills and gas leaks.

**Sonatrach International Petroleum Exploration and Production Corporation
(SIPEX BVI)**

Country of Incorporation: Algeria

Corruption criteria:

- Sontrach discloses beneficial ownership.
- The company's beneficial owner is the Algerian government.¹⁹³
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not disclose corruption-related litigation in its annual report.
- Sontrach publishes an anti-corruption policy.¹⁹⁴
- The company does not appear in the TRACE corruption database.

Environmental criteria:

- Sontrach does not publish an industry-specific sustainability report.
- It does not have an entry in the Cedre database of large-scale, offshore oil spills and gas leaks.

Suncor Energy Inc.

Country of Incorporation: Canada

Corruption criteria:

- Suncor does not disclose beneficial owners below a 10 percent threshold.
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not disclose corruption-related litigation in its annual report.
- Suncor publishes an anti-corruption policy.¹⁹⁵
- The company does not appear in the TRACE corruption database.

Environmental criteria:

- Suncor publishes an industry-specific sustainability report.¹⁹⁶
- It does not have an entry in the Cedre database of large-scale, offshore oil spills and gas leaks.

Qatar Petroleum

Country of Incorporation: Qatar

Corruption criteria:

- QP discloses beneficial ownership.
- The company's beneficial owner is the Qatari government.¹⁹⁷
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not disclose corruption-related litigation in its annual report.
- QP publishes an anti-corruption policy.¹⁹⁸
- The company does not appear in the TRACE corruption database.

Environmental criteria:

- QP does not publish an industry-specific sustainability report.
- It does not have an entry in the Cedre database of large-scale, offshore oil spills & gas leaks.

Turkiye Petrolleri Anonim Ortakligi

Country of Incorporation: Turkey

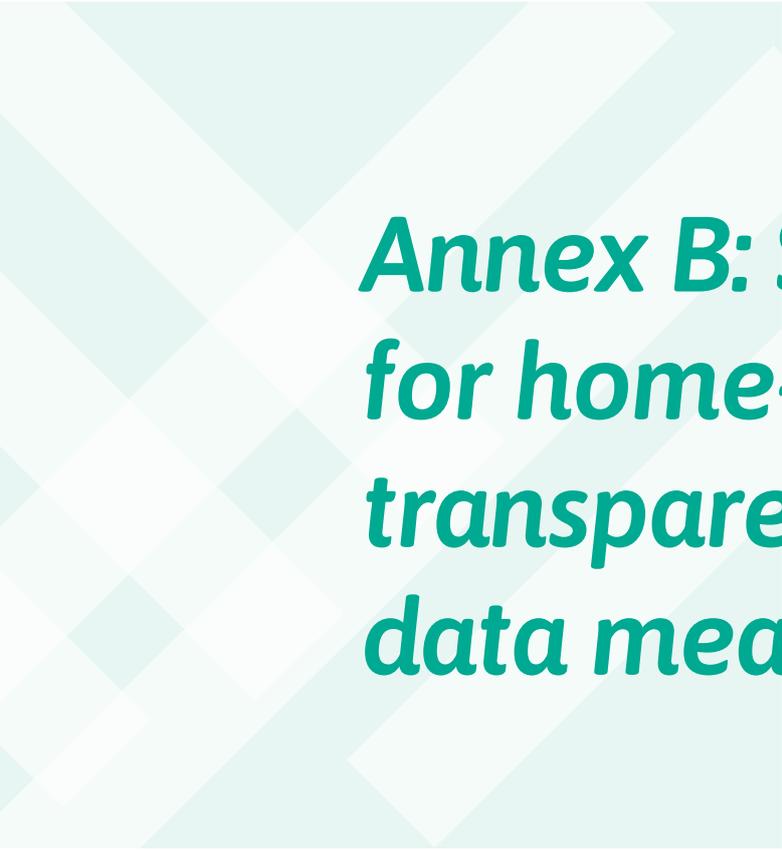
Corruption criteria:

- TPAO discloses beneficial ownership.
- The company's beneficial owner is the Turkish government.¹⁹⁹
- The company has not been subject to enforcement action by either the US Securities and Exchange Commission nor the US Department of Justice.
- It did not disclose corruption-related litigation in its annual report.
- TPAO does not publish an anti-corruption policy.
- The company does not appear in the TRACE corruption database.

Environmental criteria:

- TPAO does not publish an industry-specific sustainability report.
 - It does not have an entry in the Cedre database of large-scale, offshore oil spills and gas leaks.
-





Annex B: Sources for home-country transparency data measures

ANNEX B: SOURCES FOR HOME-COUNTRY TRANSPARENCY DATA MEASURES

Table Legend

- Positive
- Negative
- Information unavailable

Table 14: Companies rated by corruption criteria

<i>Home countries</i>	<i>Whistleblower protection law</i>	<i>Access to information law</i>	<i>EITI member</i>
USA	Positive	Positive	Positive
Italy	Negative	Positive	Negative
Japan	Positive	Positive	Negative
Denmark	Positive	Positive	Negative
Brazil	Negative	Positive	Negative
Malaysia	Positive	Negative	Negative
Spain	Negative	Positive	Negative
Netherlands	Positive	Positive	Negative
Norway	Positive	Positive	Positive
France	Positive	Positive	Negative
India	Positive	Positive	Negative
Great Britain	Positive	Positive	Positive
Lebanon	Negative	Positive	Positive
UAE	Negative	Positive	Positive
Hong Kong	Negative	Negative	Negative
Jersey	Negative	Positive	Negative

Table 14: Companies rated by corruption criteria (cont.)

<i>Home countries</i>	<i>Whistleblower protection law</i>	<i>Access to information law</i>	<i>EITI member</i>
Bermuda			
Croatia			
Russia			
South Korea			
Hungary			
Austria			
Ireland			
Thailand			
Australia			
Algeria			
Canada			
Turkey			
Qatar			
Kuwait			
St. Nevis Island			

1-a

<https://www.whistleblowers.gov>

1-b

<https://foia.state.gov/Learn/FOIA.aspx>

2-a

[https://www.changeofdirection.eu/assets/briefings/EU%20briefing%20paper%20-%20Italy%20-%20english%20\(i\).pdf](https://www.changeofdirection.eu/assets/briefings/EU%20briefing%20paper%20-%20Italy%20-%20english%20(i).pdf)

2-b

<http://www.foia4italy.it/en/news/italy-approves-freedom-of-information-act/>

3-a

https://www.oecd.org/site/adboecdanti-corruptioninitiative/WhistleblowingInJapan_Tsunoda_CAA_July2013.pdf

3-b

<http://nsarchive.gwu.edu/nsa/foia/japanfoia.html>

4-a

<https://blueprintforreespeech.net/document/denmark>

4-b

<http://www.legislationline.org/documents/action/popup/id/6833>

5-a

<http://blog.transparency.org/2015/11/12/brazil-needs-effective-protection-for-witnesses-and-victims-of-corruption/>

5-b

<https://www.article19.org/resources.php/resource/3208/en/brazil:-new-access-to-information-law-becomes-effective-today>

6-a

<http://www.sprm.gov.my/index.php/en/prevention/best-practices/197-perundangan-anti-rasuah/1061-whistleblower-protection-act-2010-act-711>

6-b

<http://www.ucl.ac.uk/constitution-unit/research/foi/countries/malaysia>

7-a

<https://www.changeofdirection.eu/campaign-central/breakthrough-in-the-protection-of-whistleblowers-in-spain>

7-b

<http://www.legislationline.org/topics/country/12/topic/3>

8-a

<https://www.changeofdirection.eu/assets/briefings/EU%20briefing%20paper%20-%20Netherlands%20-%20english.pdf>

8-b

<http://www.legislationline.org/topics/country/12/topic/3>

9-a

<https://blueprintforfreespeech.net/document/norway-overview>

9-b

<http://www.legislationline.org/topics/country/11/topic/3>

10-a

<http://www.eurocadres.eu/sapin-2-a-better-protection-for-whistleblowers-in-france/>

10-b

<http://www.ucl.ac.uk/constitution-unit/research/foi/countries/france>

11-a

<https://www.gov.uk/whistleblowing/treated-unfairly-after-whistleblowing>

11-b

<http://www.ucl.ac.uk/constitution-unit/research/foi/countries/india>

12-a

<https://www.gov.uk/whistleblowing/treated-unfairly-after-whistleblowing>

12-b

<http://www.legislationline.org/topics/country/53/topic/3>

13-a

[https://www.google.com/
url?sa=t&rct=j&q=&esrc=s&source=web&cd=2&cad=rja&uact=8&ved=0ahUKEwjO8LWKhtfVAhUEnRoKHWPxC_oOFggxMAE&url=http%3A%2F%2Ftransparency-lebanon.org%2Fen%2Fwhatwedo%2Fdetails%2F1%2F26%2F0&usq=AFOjCNF_aznzP_I8BEngRzPL-NwEbY24-A](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=2&cad=rja&uact=8&ved=0ahUKEwjO8LWKhtfVAhUEnRoKHWPxC_oOFggxMAE&url=http%3A%2F%2Ftransparency-lebanon.org%2Fen%2Fwhatwedo%2Fdetails%2F1%2F26%2F0&usq=AFOjCNF_aznzP_I8BEngRzPL-NwEbY24-A)

13-b

<http://www.lpa.gov.lb/regulations.php>

14-a

<https://www.clydeco.com/insight/article/new-protection-for-whistleblowers-in-dubai>

14-b

<https://www.state.gov/documents/organization/160079.pdf>

15-a

<https://www.lexology.com/library/detail.aspx?g=8d692490-8204-48fc-b94a-302fccf9cf49>

15-b

<http://www.hkreform.gov.hk/en/projects/accesstoinfo.htm>

16-a

<http://oben.je/2017/05/whistle-blowing-in-jersey-a-need-for-statutory-protection/>

16-b

https://www.jerseylaw.je/laws/revised/Pages/16_330.aspx

17-a

<http://www.canterburylaw.bm/pdfs/Bermuda-Employment-Law-Handbook-2015-protected.pdf>

17-b

<https://www.gov.bm/public-access-information-pati>

18-a

<https://www.changeofdirection.eu/assets/briefings/EU%20briefing%20paper%20-%20Croatia%20-%20english.pdf>

18-b

<http://www.legislationline.org/topics/country/37/topic/3>

19-a

<https://www.lexology.com/library/detail.aspx?g=9d652828-1041-4190-b02e-b39f92e89841>

19-b

<http://www.ucl.ac.uk/constitution-unit/research/foi/countries/russia>

20-a

<https://www.lexology.com/library/detail.aspx?g=9d652828-1041-4190-b02e-b39f92e89841>

20-b

<https://www.article19.org/resources.php/resource/38242/en/country-report:-the-right-to-information-in-south-korea>

21-a

<https://www.lexology.com/library/detail.aspx?g=482b2d89-a20f-411b-80e1-aa2fb910c569>

21-b

http://www.natarch.hu/english/menu_41.htm

22-a

<http://journalism.cmpf.eui.eu/maps/whistleblowing/>

22-b

<https://www.access-info.org/uncategorized/21940>

23-a

http://www.citizensinformation.ie/en/employment/enforcement_and_redress/protection_for_whistleblowers.html

23-b

<http://www.legislationline.org/topics/country/23/topic/3>

24-a

http://www.whistleblowers.org/index.php?option=com_content&task=view&id=605&Itemid=99999999

24-b

<https://www.article19.org/resources.php/resource/38143/en/the-right-to-information-in-thailand>

25-a

<http://ballawyers.com.au/2017/04/05/whistleblowers-protection-australia/>

25-b

<https://www.oaic.gov.au/freedom-of-information/foi-act>

26-a

<https://www.state.gov/e/eb/rls/othr/ics/2016/nea/254433.htm>

26-b

<http://www.giswatch.org/country-report/20/algeria>

27-a

http://www.transparencycanada.ca/wp-content/uploads/2015/06/TI-Canada_Whistleblower-Report_Final1.pdf

27-b

<http://www.legislationline.org/topics/country/38/topic/3>

28-a

<https://www.lexology.com/library/detail.aspx?g=78c363e2-e34d-4ed1-bf49-5d887779f3b4>

28-b

<http://www.legislationline.org/documents/action/popup/id/6419>

29-a

http://www.eversheds-sutherland.com/documents/services/employment/Employment/Whistleblowing-Survey-Results-brochure_V15_pr.pdf

29-b

<https://www.state.gov/documents/organization/253155.pdf>

30-a

http://www.justiciabc.com/Modules/Studies/Uploadspdf/956411818_pdf.pdf

30-b

<https://www.state.gov/documents/organization/253145.pdf>

31-a

<https://www.state.gov/j/drl/rls/hrrpt/2013/wha/220467.htm>

31-c

<https://eiti.org/countries>

Appendix: Endnotes

APPENDIX: ENDNOTES

1

There are 51 applicants, but two applicants are part of a so-called “Group of Companies,” meaning two companies pre-qualified as one legal entity. These “Group of Companies” are GeoPark/Petroleb and Crescent Petroleum/Apex Oil & Gas. Crescent Petroleum also prequalified to apply alone (GeoPark did not). LOGI evaluated each company individually and thus evaluated 52 total companies.

2

See the 2010 State of the Environment report for more detail: <http://www.moe.gov.lb/The-Ministry/Reports/State-Of-the-Environment-Report-2010.aspx?lang=en-us>

3

Transparency International, Corruption Perception Index 2016 results table, available here: https://www.transparency.org/news/feature/corruption_perceptions_index_2016#table

4

The full report is available here: http://www.keepeek.com/Digital-Asset-Management/occd/governance/occd-foreign-bribery-report_9789264226616-en#.Wa_VeSN97yl#page10

5

Timeline for oil and gas in Lebanon and the region, LOGI website (see here: <http://www.logi-lebanon.org/Timeline>)

6

Ibid.

7

See here: <http://www.mesp.me/wp-content/uploads/2014/08/Lebanese-Media-Coverage-of-the-Oil-and-Gas-Sector.pdf>

8

Ibid.

9

Offshore Petroleum Resources Law (OPRL), article 10 (see here: <http://www.lpa.gov.lb/pdf/OPRL%20-%20English.pdf>)

10

The OPRL does not specifically mention parliament’s role in the sector, it does have the constitutional power to legislate and hold the CoM accountable, see Lebanese Constitution articles 16 and 37

11

OPRL article 1

12

OPRL article 8

13

See A Citizen's Checklist (available here: <https://www.globalwitness.org/sites/default/files/a%20citizens%20checklist%20en%20jan%202012.pdf>)

14

Exploration and Production Agreement model contract article 8 (work commitment) and articles 23 and 24 (fiscal terms) (see here: <http://www.lpa.gov.lb/pdf/Decree%20%2043%20-%20EPA%20-%20Rev%206%20-%2029-09-2015.pdf>)

15

OPRL article 1 "Exploration and Production Agreement"

16

OPRL article 1 "Right Holder"

17

Roberts, Peter. "Joint Operating Agreements: A practical guide," Second Edition, 2012 https://kisslibrary.com/book/A00D1A1CEC3197FED6DA?utm_source=oldtraf&utm_medium=banner&utm_campaign=oldtraf&tb=http%3A%2F%2Fdev.quabook.com%2Fview%3Ffilename%3DJoint.Operating.Agreements%253A.A.Practical.Guide.pdf%26q%3DJoint%2BOperating%2BAgreements%253A%2BA%2BPractical%2BGuide%26group%3Dtst217%26source%3Dlqkeys-d0908-1&search=joint%20Operating%20Agreements%3A%20A%20Practical%20Guide

18

See here: <https://www.petropedia.com/definition/7062/joint-operating-agreement-joa>

19

See the Prequalification Results Presentation, page 5 (available here: <http://www.lpa.gov.lb/pdf/Pre-Qualification%20Results%20Presentation.pdf>)

20

Model Exploration and Production Agreement, article 16 (available here: <http://www.lpa.gov.lb/pdf/Decree%20%2043%20-%20EPA%20-%20Rev%206%20-%2029-09-2015.pdf>)

21

See the Prequalification Results Presentation, page 7 (available here: <http://www.lpa.gov.lb/pdf/Pre-Qualification%20Results%20Presentation.pdf>)

22

OPRL article 1 "Right Holder"

23

2013 Prequalification decree, article 2 (see here: <http://www.lpa.gov.lb/pdf/Pre-qualification%20Application%20Package.pdf>)

24

OPRL article 8.2 (see here: <http://www.lpa.gov.lb/pdf/OPRL%20-%20English.pdf>)

25

OPRL article 10.b (see here: <http://www.lpa.gov.lb/pdf/OPRL%20-%20English.pdf>)

26

Pre-qualification decree article 8 (see here: <http://www.lpa.gov.lb/pdf/Pre-qualification%20Application%20Package.pdf>)

27

See 2017 and 2013 Prequalification results here: <http://www.lpa.gov.lb/prequalification.php>

28

See A Citizen's Checklist (available here: <https://www.globalwitness.org/sites/default/files/a%20citizens%20checklist%20en%20jan%202012.pdf>)

29

Prequalification decree, article 3.3 (available here: <http://www.lpa.gov.lb/pdf/Pre-qualification%20Application%20Package.pdf>)

30

Pre-qualification decree, article 7.4 (available here: <http://www.lpa.gov.lb/pdf/Pre-qualification%20Application%20Package.pdf>)

31

Model exploration and production agreement, article 6.8

32

Model exploration and production agreement, article 7

33

Telephone interview with the author July 5, 2010

34

The dissolved partnership was between Russia's Novatek and Russia's GPB Global Resources. Novatek pre-qualified alone as a non-operator in 2017, according to the LPA's website (see here: <http://www.lpa.gov.lb/prequalification.php>)

35

See here for the resolution's text: <http://www.ohchr.org/EN/ProfessionalInterest/Pages/NaturalResources.aspx>

36

Ibid.

37

In the EU, a 2013 directive requires all oil and gas companies publicly listed in an EU country to report project-by-project payments to governments (available here: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32013L0050&from=EN>). A similar rule in the US was repealed in February (see here: <https://www.govtrack.us/congress/bills/115/hjres41>)

38

For more information see here: <http://www.publishwhatyoupay.org/>
and here: www.eiti.org

39

Although none of the companies pre-qualified in Lebanon have been subject to legal action related to the UK Bribery act (see here: <https://www.sfo.gov.uk/our-cases/case-archive/> and here: <https://www.sfo.gov.uk/our-cases/#aza>).

40

See the American Petroleum Institute's website for more information: <http://www.api.org/oil-and-natural-gas/environment/environmental-performance>

41

See model contract article 27 <http://www.lpa.gov.lb/pdf/Decree%20%2043%20-%20EPA%20-%20Rev%206%20-%202029-09-2015.pdf>

42

TRACE's database does not link to source documents and includes information in news reports that does not always result in litigation.

43

See, for example, advice from the US-based financial firm Morgan Stanley on how to choose oil and gas companies for responsible investing purposes available here: https://www.morganstanley.com/sustainableinvesting/pdf/Oil_andGas_ESG_Framework_Exec_Summary.pdf

44

See ENI sustainability report, page 23 https://www.eni.com/docs/en_IT/enicom/sustainability/Eni-FOR-Performance.pdf

45

For more information on the Global Reporting Initiative and the GRI standard, see here: <https://www.globalreporting.org/Information/about-gri/Pages/default.aspx>

46

<http://wwz.cedre.fr/en/Cedre/Association>

47

The results presentation is available here: <http://www.lpa.gov.lb/pdf/Pre-Qualification%20Results%20Presentation.pdf>

48

As defined by article 3.3 of the 2013 pre-qualification decree.

49

<http://www.lpa.gov.lb/news2017.php>

50

<http://www.lpa.gov.lb/prequalification.php>

51

<https://resourcegovernance.org/sites/default/files/documents/corruption-risks-in-the-award-of-extractive-sector-licenses-and-contracts.pdf>

52

The LPA's website explains that the Novatek-GPB Global Resources "Group of Companies" dissolved between 2013 and 2017, therefore Novatek successfully applied to pre-qualify as a non-operator alone in 2017. See here: <http://www.lpa.gov.lb/prequalification.php>

53

Crescent Petroleum Company International is pre-qualified both alone and as part of a "Group of Companies" joint ventures with Apex Gas Limited, which is why it appears twice.

54

Because of the "Group of Companies" loophole in the pre-qualification decree, there are 38 corporate entities pre-qualified as non-operators, representing a total of 39 companies

55

In 2014, Executive Magazine purchased Apex Oil and Gas Limited's registration papers (only to find nominee officers and shareholders listed), interviewed nominee service providers in Hong Kong to confirm the sole purpose of said service and interviewed Mahmoud Sidani and Mohammad Choucair, who admitted they were the actual owners of Apex. See here: <http://www.executive-magazine.com/business-finance/business/lebanons-murky-petroleum-business>

56

Ibid.

57

Crescent Petroleum Company International is pre-qualified both alone and as part of a "Group of Companies" joint ventures with Apex Gas Limited. The row featuring Crescent alone represents LOGI's assessment of Crescent. The row featuring Crescent and Apex together represents LOGI's assessment of Apex alone for the purposes of this report, although the government views Crescent and Apex as one legal entity pre-qualified with Crescent's experience, according to article 3.3 of the pre-qualification decree.

58

According to article 3.3 of the pre-qualification decree, to the Lebanese government, GeoPark and Petroleb are one corporate entity, pre-qualified based on GeoPark's ability to meet the criteria. However, for the purposes of this report, we have analyzed the companies separately. The bolded member of the partnership is the one being evaluated in the corresponding row.

59

Crescent Petroleum Company International is pre-qualified both alone and as part of a "Group of Companies" joint ventures with Apex Gas Limited. The row featuring Crescent alone represents LOGI's assessment of Crescent. The row featuring Crescent and Apex together represents LOGI's assessment of Apex alone for the purposes of this report, although the government views Crescent and Apex as one legal entity pre-qualified with Crescent's experience, according to article 3.3 of the pre-qualification decree.

60

According to article 3.3 of the pre-qualification decree, to the Lebanese government, GeoPark and Petroleb are one corporate entity, pre-qualified based on GeoPark's ability to meet the criteria. However, for the purposes of this report, we have analyzed the companies separately. The bolded member of the partnership is the one being evaluated in the corresponding row.

61

Crescent Petroleum Company International is pre-qualified both alone and as part of a "Group of Companies" joint ventures with Apex Gas Limited. The row featuring Crescent alone represents LOGI's assessment of Crescent. The row featuring Crescent and Apex together represents LOGI's assessment of Apex alone for the purposes of this report, although the government views Crescent and Apex as one legal entity pre-qualified with Crescent's experience, according to article 3.3 of the pre-qualification decree.

62

See article 5.2.5 of Annex 5 here: <http://www.lpa.gov.lb/pdf/Pre-qualification%20Application%20Package.pdf>

63

See here https://www.sec.gov/Archives/edgar/data/773910/000119312517087341/d335961ddef14a.htm#toc335961_5

64

See here: http://www.anadarko.com/content/documents/apc/Responsibility/Governance_Documents/codeethics_final.pdf

65

See here: https://www.sec.gov/Archives/edgar/data/93410/000119312517119801/d304635ddef14a.htm#xtoc304635_55

66

See here: <https://www.sec.gov/news/press/2007/2007-230.htm>

67

See here: <https://www.chevron.com/-/media/shared-media/documents/chevronbusinessconductethicscode.pdf>

68

See here: https://www.Traceinternational.org/TraceCompendium/Detail/58?class=casename_searchresult&type=1

69

<https://www.chevron.com/corporate-responsibility/reporting/industry-specific-reporting>

70

See here https://www.eni.com/docs/en_IT/enicom/publications-archive/publications/reports/reports-2016/Annual-Report-On-Form-20-F-2016.pdf

71

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