



**Final Report**  
BO Study - Papua New Guinea

December 2020

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## List of abbreviations

BO	Beneficial Ownership or Beneficial Owner
CSOs	Civil Society Organisations
EITI	Extractive Industries Transparency Initiative
EU	European Union
FATF	Financial Action Task Force
ITA	Income Tax Act 1959
IPA	Investment Promotion Authority
JV	Joint Venture
LLC	Limited Liability Company
MA	Mining Act 1992
MSG	PNGEITI Multi-stakeholder Group
OGA	Oil and Gas Act 1998
PEP	Politically exposed person
PNG	Papua New Guinea
PNG-EITI	Papua New Guinea Extractive Industries Transparency Initiative
RBOD	Roadmap for BO Disclosure
TOR	Terms of Reference

## 1. Executive Summary

### 1.1. Introduction

BDO Tunisia Consulting (BDO) and BDO PNG (together hereinafter referred to as “BDO”) are pleased to present this report presenting BO data collected from licence holders and applicants and setting out recommended draft mechanisms to implement a public beneficial ownership register in PNG, in support to the implementation of PNG’s Roadmap for BO Disclosure (RBOD)<sup>1</sup>.

This report builds on the BO scoping report dated 21 October 2020 and the review of International Good Practice for BO Disclosure.

This report describes the approach, definitions and scope of the BO data collection and provides recommendations on issues that will need considering when implementing a mandatory BO disclosure regime once the core definition has been agreed. This report also lists approaches for specific key elements of the mechanisms for BO disclosure regime. The aim is to provide key stakeholders with a platform for consultation on the substance of the essential elements of the mechanisms.

The report is structured as follows:

- Chapter 1: provides a brief summary of the agreed definitions, the approved BO data collection template and guidelines, the disclosure mechanism, and the proposed implementation of a BO register that is accessible to public.
- Chapter 2: provides the approved BO and PEP definition, the scope for BO data collection as well as approach for participating companies to assure the accuracy of BO information.
- Chapter 3: provides the analyses of BO data collected and the assessment of identified gaps and weaknesses and sets out the architecture of the developed EITI BO register
- Chapter 4: provides a brief summary of key policy drivers and national goals towards the introduction of mandatory BO disclosure regime and sets out options on how a new BO register might build on, and work in conjunction with, the Company Register
- Chapter 5: provides an assessment of progress in meeting EITI requirement 2.5.

### 1.2. Summary and conclusions

#### ❖ BO/PPE Definitions

PNG has demonstrated its commitment to beneficial ownership disclosure through its National Action Plan on Promotion of Open Governance in August 2018- August 2020; the EITI-PNG Work plan (2019); the PNG Roadmap for BO disclosure; the Anti-Money Laundering and Counter Terrorist Financing Act 2015 (No. 20 of 2015); the National Policy for Transparency and Accountability in the Extractives Sector in Papua New Guinea;<sup>2</sup> and Principles and Prudential Requirements (Bank of PNG).

Various pieces of existing PNG legislation have set policy goals that are driving the introduction of a mandatory BO disclosure regime. Whilst it would be desirable to use a uniform definition for a multi-sector mandatory BO disclosure regime, existing PNG law definitions do not satisfy the more onerous minimum criteria based on international good practice for ownership transparency in the extractive sector.

The definition proposed in the scoping report and agreed by PNG-MSG for BO data collection includes the criteria for identifying the BO including level of ownership or control through voting rights or other measures. The agreed threshold of 5% for disclosing BO is a key part of the definition and it is towards the low-end of the recommended EITI range. The systematic disclosure of PEPs irrespective of the level of control or ownership was also considered for a more effective BO disclosure regime.

It is recommended to initiate discussion with the Investment Promotion Authority (IPA), the Financial, Analysis and Supervision Unit (FASU) at the Bank of PNG and the Mineral Resources Authority (MRA) to consider this definition for any BO legal framework reform.

<sup>1</sup> <http://www.pngeiti.org.pg/beneficial-ownership/>

<sup>2</sup> [https://eiti.org/files/documents/png\\_eiti\\_national\\_policy\\_final\\_2019\\_1.pdf](https://eiti.org/files/documents/png_eiti_national_policy_final_2019_1.pdf)

### ❖ BO data collection template

For the purposes of BO data collection, a new template and guidelines were proposed and adopted by PNG- MSG. The proposed amendments to the reporting template include a clear statement of who is responsible for signing the form to certify accuracy and completeness of data provided, sufficient space to include all relevant information as required by the EITI Standard, especially on politically exposed persons and ownership chain.

Although the expectation is that PNG will implement the collection of BO data through IPA online system used for the existing company register, the first step to achieving this goal will be to initially develop a template for reporting, which can then be built into the register. The BO data collection template approved by PNG-MSG may be considered for the online declaration system, taking into account the decisions made on the recommended definition and disclosure mechanisms.

### ❖ Scope and disclosure mechanisms

Collection of BO information can be achieved using a range of tools, from Excel templates and questionnaires to fully integrated web portals and bespoke databases. The scale of the solution should match the scale of the information being collected and to facilitate making the information publicly available. However, collection will only be successful where it is backed by a statutory obligation.

All legal entities that apply for or hold participating interest in exploration and production contracts or licenses in the oil, gas and mining sectors were invited to disclose their BOs using the proposed template and detailed guidelines including among others, the data assurance procedure.

### ❖ Implementation of a BO register

PNG has an opportunity to implement a mandatory BO regime at a time when there is substantial institutional guidance and there are suitable examples of emerging international good practices.

Common challenges that emerge from review of BO data collected through EITI-PNG are the difficulty in the collection and verification of BO information without a legal framework and the efficiency of a BO disclosure regime encompasses a clear definition set out in law, a public access to BO registers and a general application to all corporate entities regardless of the industry.

The elements required for the mechanisms to implement and administer a BO disclosure regime are (i) the architecture of the BO register; (ii) the data collection framework, (iii) publication mechanisms, (iv) sanction system, and (vi) the legislative process. This report lists the approaches and provides recommendations for specific key elements of the mechanisms for BO disclosure regime.

It is recommended to initiate discussion with the Investment Promotion Authority (IPA), the Financial, Analysis and Supervision Unit (FASU) at the Bank of PNG and the Mineral Resources Authority (MRA) to implement a comprehensive BO legal framework in PNG, taking into account the recommendations included in this report.

### ❖ Analyses of BO data collected

Of the 145 extractive companies, only 21 companies have submitted their BO declarations. Of the 21 companies that submitted their declaration, 20 companies are more than 95% owned subsidiaries of publicly listed companies. The reporting entities that have submitted a BO declaration represent more than 29%<sup>1</sup> of the extractive revenues collected by PNG. None of the reported BOs was identified as a PEP by the reporting entities. the detail of reporting entities and BO data submitted is presented in section 3.

The key deficiencies in the reported data are:

- lack of information on ultimate beneficial owners ie ownership is not reported back to natural persons;
- failure to provide the link to BO disclosure for publicly listed companies;
- failure to provide legal ownership information even it is available on IPA website;
- failure to provide information on the intermediary legal entities or the ownership chain;
- where individuals were identified, there is a lack of detail enabling confirmation of individuals eg ID numbers, dates of birth and addresses.

<sup>1</sup> Government revenues from extractive companies, per revenue stream 2017



A common theme that emerged from discussions with reporting entities was the lack of understanding amongst companies' focal points of the concept of beneficial ownership. The difficulties in obtaining complete information appear to bear out this analysis. Companies cited the need for awareness raising and information campaigns.

In our view and in addition to the absence of a legal provision to collect BO information, challenges faced by reporting entities are mainly due to the following reasons:

- several reporting entities did not attend the BO training workshop;
- unfamiliarity with BO concept especially for non-publicly listed companies ;
- complex corporate structures especially where there are multiple layers of ownership involving several jurisdictions and different types of legal entities;
- Unavailability of BO data at the reporting entities level for overseas companies;
- misunderstanding of BO guidelines as most of publicly listed companies have included in their declaration the link to the company website or to the stock exchange website instead of the link to BO disclosure on the stock exchange website.

❖ **Action plan**

Actions	Stakeholders
<p><b>1.Compliance with Requirement 2.5</b></p> <ul style="list-style-type: none"> <li>➤ Consultations with DPE and MRA in order to publish a letter inviting extractive companies to submit their BO declarations including:               <ul style="list-style-type: none"> <li>• both licences holders and licences applicants as recipient; and</li> <li>• the link to the electronic version of BO declaration form and reporting guidelines.</li> </ul> </li> <li>➤ Updating the BO register developed as new declarations are received.</li> </ul>	<p>EITI- PNG/MRA/DPE</p>
<p><b>2.BO Legal framework</b></p> <ul style="list-style-type: none"> <li>➤ Consultations with stakeholders and development of a legislative package that establishes the framework necessary to meaningfully advance on beneficial ownership transparency and implement an open register of beneficial owners.</li> <li>➤ This legislative package will be based on a comprehensive analysis of international experiences on issues such as the Beneficial Ownership Data Standard, the definition of beneficial owners, verification mechanisms, and the range of required documentation as recommend in section 4 of this report. .</li> </ul>	<p>EITI/IPA/MRA/DPE</p>
<p><b>3. Awareness and training</b></p> <ul style="list-style-type: none"> <li>➤ Initiate discussions with Mineral Resources Authority (MRA) and the Department of Petroleum and Energy to ensure beneficial ownership information is collected from licence applicants in addition to licence holders</li> <li>➤ Design and implement a sustained campaign to explain the concept of beneficial ownership to companies, encompassing an explanation of the drivers behind including it in the EITI Standard, the extent and nature of the information to be reported and the advantages to be gained from full compliance</li> </ul>	<p>EITI/MRA/DPE/IPA Extractive companies</p>
<p><b>4.Development of a database</b></p> <ul style="list-style-type: none"> <li>➤ Development of a BO database using the Beneficial Ownership Data Standard of with the IPA which will be responsible of the technical implementation. The database will be open and freely accessible to the public and ensure adequate use and search capabilities as per for legal ownership data.</li> <li>➤ Piloting the register by entering data of ultimate beneficial owners of companies. This includes collecting, verifying, publishing, and resolving system problems which are encountered during the pilot.</li> <li>➤ Launch of an open and public register of ultimate beneficial owners and parallel launch of a public awareness campaign.</li> </ul>	<p>EITI/IPA</p>

## 2. Data collection: Approach, definitions and scope

Legal entities that apply for or hold a participating interest in an oil, gas or mining license or contract in PNG, including foreign companies, where invited to submit a BO declaration pursuant the following definitions, scope and approach agreed by the PNG-MSG.

### 2.1. BO/PEP definition

Requirement 2.5 of the EITI Standard 2019 contains EITI's definition of BO. The definition is: "A *beneficial owner in respect of a company means the natural person(s) who directly or indirectly ultimately owns or controls the corporate entity.*"

After considering international norms and relevant national laws detailed in the scoping study, PNG-MSG has considered the following as a definition of "beneficial owner" for use for PNG-EITI reporting:

#### 1. Beneficial Owner

A "beneficial owner" of a legal entity is the natural person(s) who ultimately control(s) or own(s) the legal entity, whether such ownership or control is direct or indirect.

For the purposes of this Clause, if a natural person directly or indirectly:

- a) owns or controls 5% or more of the shares or voting rights in a legal entity; or
- b) in the case where the natural person is a Politically Exposed Person, that natural person owns a single share or a single voting right or more in a legal entity; or
- c) has the right to appoint, veto the appointment or remove a majority of the board of directors or equivalent body of a legal entity or legally binding arrangement; or
- d) in circumstances where a) - to c) do not apply, has the right to exercise, or actually exercises, significant influence or control over or derives significant economic benefit from a legal entity.
- e) For the avoidance of doubt agents, nominees, trustees and other intermediaries shall not be deemed to be a beneficial owner.
- f) In the case of a joint venture, each entity within the venture should disclose its beneficial owner(s).

#### 2. Exceptions

Publicly listed companies, including wholly-owned subsidiaries, are required to disclose the name of the stock exchange and include a link to the stock exchange BO filings where they are listed.

If a government or governmental body would, if it were a natural person, be deemed to be a beneficial owner pursuant to clause 1 above, then that government or governmental body shall be a beneficial owner.

#### 3. Politically Exposed Person

*"The term 'politically exposed person' means :*

- a) A natural person who is or has been entrusted with prominent public functions in a foreign country with prominent public functions, including but not limited to, a Head of State or the head of a government, a senior politician, a senior government official, a senior judicial or a senior military official; or
- b) A natural person who is or has been a senior executive in a foreign country of a state-owned company of that foreign company; or
- c) A natural person who is or has been a senior political party official in a foreign country; or
- d) A natural person who is or has been entrusted with a prominent function by an international organisation, including but not limited to directors, deputy directors and members of the board or equivalent positions; or

e) A natural person who or has been entrusted in Papua New Guinea with prominent public functions as listed in Section 26 (Application of Division 2) of the Constitution; or

f) A natural person who is a family member or is known to be a close associate of a person mentioned in paragraphs (a) to (e)”

*“For the purpose of clause 3, ‘family members’ definition includes the following:*

- *the spouse, or a person considered to be equivalent to a spouse, of a politically exposed person;*
- *the children or grandchildren and their spouses, or persons considered to be equivalent to a spouse, of a politically exposed person;*
- *the parents or grandparents of a politically exposed person, whether such relationship be natural, adoptive or otherwise.*

*‘persons known to be close associates’ means:*

- *natural persons who have joint BO of legal entities or legal arrangements, or any other close business relations, with a politically exposed person;*
- *natural persons who have sole BO of a legal entity or legal arrangement, which is known to have been set up for the de facto benefit of a politically exposed person. “*

Public functions listed in Section 26 (Application of Division 2) of the Constitution are:

- “a. the Prime Minister, the Deputy Prime Minister and the other Ministers; and*
- b. the Leader and Deputy Leader of the Opposition; and*
- c. all other members of the Parliament; and*
- d. members of Provincial Assemblies and Local-level Governments; and*
- e. all constitutional office-holders within the meaning of Section 221(definitions); and*
- f. all heads of Departments of the National Public Service; and*
- g. all heads of or members of the boards or other controlling bodies of statutory authorities; and*
- h. the Commissioner of Police; and*
- i. the Commander of the Defence Force; and*
- j. all ambassadors and other senior diplomatic and consular officials prescribed by an Organic Law or an Act of the Parliament; and*
- k. the public trustee; and*
- l. the personal staff of the Governor-General, the Ministers and the Leader and Deputy Leader of the Opposition; and*
- m. executive officers of registered political parties as defined by Section 128 (“registered political party”); and*
- n. persons holding such public offices as are declared under Subsection (3) to be offices to and in relation to which this Division applies.”*



## 2.2. Classes of data to be collected

EITI Standard prescribe the following information about BO that must be collected :

- name;
- nationality;
- country of residence;
- the level of ownership; and
- nature of control.

EITI Standard also recommend to collect the following details of the beneficial owners:

- the national identity number;
- date of birth;
- residential or service address; and
- means of contact.

PNG-MSG has considered a new BO declaration form presented in annex 1. The declaration form includes the following data:

**A. DF1. BO declaration** includes the signed statement of submitting person along with data on beneficial owners, which shall be filled in Sections A to B according to the instructions below. In this statement the company is required to tick off certifying:

- the number of identified beneficial owners;
- the exemption from BO data declaration (filling Section A) if the company is a publicly listed company, a wholly owned subsidiary of a publicly listed company or if the BO is a State;
- the Absence of a Beneficial Owner -if surveys have revealed that no natural persons are considered as beneficial owners of the given company for the purpose of EITI reporting; and
- the information provided is accurate and complete. If not, the company is required to explain the reasons.

**B. DF2. Section A** shall be filled in data on the legal entity (hereinafter referred to as Company) submitting the Declaration. Each company shall fill in this Section only once. In this section the reporting entity is required to provide the following information:

**1. Company data:** Name and registration data of the company shall be filled in this Sub-Section, including name of the company, the country of registration, the registration number and the office address of the company by which the registration of the company has been is carried out.

**2. State Participation:** Data on State participation in the company shall be filled in this Sub-Section. Any direct or indirect State ownership of the company shall be filled in the Table regardless of the participation percentage.

**3. Publicly listed Company:**

3.1 This subsection shall be ticked off to certify public listing of the company. Data on the publicly listed shares shall be filled in this subsection, including stock exchange name, Legal Entity Identifier (LEI) and link to the stock exchange documents/filings. The data for each Stock Exchange shall be filled in separately.

3.2 In case of ticking off the field “Company is a wholly owned subsidiary of a publicly listed entity,” the company shall fill in data of the publicly listed Legal Entity including the name of the legal entity, stock exchange name, Legal Entity Identifier (LEI) and link to the stock exchange documents/filings.

**4. Legal ownership** - Data on shareholding in the company shall be filled in this subsection, including the names of direct shareholders, the participation interest, the nature, the country of registration and the identification number. If the shareholder is a publicly listed entity, the stock exchange name, Legal Entity Identifier (LEI) and link to the stock exchange documents/filings shall be filled in this section. The data for each shareholder shall be filled in separately.

**C. DF3. Section B** shall be filled in data on the natural person - the beneficial owner. This section shall be filled in separately for each for the company’s beneficial owner. Each beneficial owner is given a number (1, 2, 3, etc.). For each beneficial owner, the company is required to provide the following information:

**1. Beneficial Owner's identity data** - Personal identity data of a beneficial owner shall be filled in this subsection as given in the beneficial owner's ID. Beneficial owner's contacts and address of residence shall also be filled in this subsection.

**2. Status of a Politically Exposed Person** - This subsection shall be ticked off, if the beneficial owner is considered a Politically Exposed Person for the purpose of the EITI Reporting. The company determines the circumstance of being a PEP based on the data that became available no longer than 30 days before the day of submission of the Declaration on BO.

**3. Information about how ownership is held or control over the company is exercised** - The grounds for being considered a beneficial owner of the company shall be filled in in this subsection along with the required information related to these grounds. In case of being a beneficial owner on more than one grounds, all grounds shall be marked in the appropriate clauses.

**3.1** This subsection shall be filled, if a natural person holds at least 5 percent of shares in the company, either through ownership of a stock/shares in the company (direct shareholding) or through ownership of a stock/shares of another Legal Entity owning a stock/shares in the company (indirect shareholding). Indirect shareholding may be exercised regardless of the number of intermediary legal entities in the chain of the "Natural person - Company".

Total shares/voting rights shall be calculated based on the sum of all the percentages of shares/voting rights in the company both directly and indirectly owned by the beneficial owner. In the event of indirect shareholding, the share of the beneficial owner in the company shall be calculated based on the participation/voting rights percentage of each previous intermediary entity, namely, by multiplying the percentage of the Legal Entity's shares in the company by the percentage of shares of relevant intermediary entity in the Legal Entity owning shares in the Company and so on. In case the field "indirect shareholding" is filled, the number of intermediary entities operating in the chain of the company and beneficial owner shall be filled in for the relevant beneficial owner.

**3.2** This shall be filled, if the natural person holds the right to exercise influence or control over the company by other means. The legal tools underlying such a capacity shall be mentioned, if available.

**3.3** In the field "Acquisition date, the date of the last acquisition by the power of which a person becomes a beneficial owner of the company shall be filled in, and if the person has become a beneficial owner on another ground, the date of becoming a beneficial owner is indicated.

**3.4** Data on shareholding of the intermediary legal entity either direct, indirect or a combination of both in the company, shall be filled in in this subsection. The reporting entity is also required as an option to provide the company ownership map.

## 2.3. BO data assurance procedure

According to the requirement 2.5 (e), the MSG should assess any existing mechanisms for assuring the reliability of BO information and agree an approach for corporate entities within the scope to assure the accuracy of the BO information they provide. This could include requiring companies to attest the BO declaration form through sign-off by a member of the senior management team or senior legal counsel, or submit supporting documentation.

Given the lack of legal framework for BO disclosure in PNG, the PNG-MSG has considered the following approach to assure the accuracy of BO data submitted by reporting entities:

- BO declaration should be signed-off by an official authorised to represent the company, confirming that all the information reported is "accurate and complete";
- The statement shall indicate the first and last names of the person submitting the declaration, their status in the company, the number of enclosed pages, the date, month and year of submission;
- Documents certifying the ownership right of the legal entity's equity share issued by the relevant competent authority (including foreign country's) should be submitted for high risk companies (if any) and are optional for other companies;
- Legal ownership data submitted is checked with the data available on the IPA company register (publicly accessible free of charge on: <https://www.ipa.gov.pg/>)

In addition, when the information provided is not accurate or incomplete, reporting entities were given the possibility to explain the reasons by selecting one of the following options:

- Where a legal entity is unable to immediately identify its BOs

If a legal entity has reason to believe that it has a BO but was unable to identify within the reporting timeframe, the company should submit the BO declaration on time and should indicate, for example:

“The company has not yet completed the process of taking reasonable steps to identify anyone who is a BO in relation to the company.”

- Where a legal entity is unable to verify BOs data

If a company has one or more BOs but is unable to verify the information relating to such person(s), when it has taken reasonable steps to do so, it must note this fact on the BO declaration. The BO declaration should indicate that, for example:

“The company knows or has reasonable cause to believe that there is a BO in relation to the company, but it has not been able to verify such BO.”

- Where a legal entity has identified a BO but cannot confirm the BO details

A company may have identified the BO but is unable to confirm one or more pieces of the minimum required information, it must note this fact on the BO declaration. The BO register should indicate that:

“The company identified a BO in relation to the company but the minimum required information in respect of that person has not been confirmed”.

## 2.4. Scope of reporting entities

According to the requirement 2.5 (c), BO disclosure applies to corporate entity(ies) that apply for or hold a participating interest in an exploration or production oil, gas or mining license or contract.

A letter has been issued by the Mineral Resources Authority (MRA) and the Department of Petroleum and Energy inviting all licence holders and corporate entities that apply for a license in oil & gas and mining sectors to submit their BO declaration. The invitation letter as well as the declaration form and reporting guidelines have been published on EITI-PNG website.

In addition, extractive companies were invited to attend a workshop to provide guidance on how to fill out the BO declaration form including a presentation of practical cases on how to determine whether an individual is the ultimate beneficial owner of the company.

### 3. BO Data collected and BO data base

#### 3.1. Analysis of BO data submission

Of the 145 companies, only 21 companies have submitted their BO declarations. The detail of defaulting companies is listed in tables below.

Sector	Total number of licence holders	BO declaration submitted
Mining	108	3
Oil and gas	32	18
State Owned Entities	5	-
<b>Total</b>	<b>145</b>	<b>21</b>

Of the 21 companies that submitted their declaration, 20 companies are more than 95% owned subsidiaries of publicly listed companies.

The reporting entities that have submitted a BO declaration represent more than 29%<sup>1</sup> of the extractive revenues collected by PNG. None of the reported BOs was identified as a PEP by the reporting entities.

When the information is publicly available, the declarations submitted were crosschecked/completed by using the data available on the Registrar of Companies of the IPA (<https://www.ipa.gov.pg/>) and the stock exchange documents. A capture of these documents as well as the access link are presented in annex 3.

As shown in the table below, complete BO and legal ownership data were collected for 20 extractive companies. Where data is available on the IPA website, company and legal ownership data were also collected for the preparation of this report.

The key deficiencies in the reported data are:

- lack of information on ultimate beneficial owners ie ownership is not reported back to natural persons;
- failure to provide the link to BO disclosure for publicly listed companies;
- failure to provide legal ownership information even it is available on IPA website;
- failure to provide information on the intermediary legal entities or the ownership chain;
- where individuals were identified, there is a lack of detail enabling confirmation of individuals eg ID numbers, dates of birth and addresses.

A common theme that emerged from discussions with reporting entities was the lack of understanding amongst companies' focal points of the concept of beneficial ownership. The difficulties in obtaining complete information appear to bear out this analysis. Companies cited the need for awareness raising and information campaigns.

In our view and in addition to the absence of a legal provision to collect BO information, challenges faced by reporting entities are mainly due to the following reasons:

- several reporting entities did not attend the BO training workshop;
- unfamiliarity with BO concept especially for non-publicly listed companies ;
- complex corporate structures especially where there are multiple layers of ownership involving several jurisdictions and different types of legal entities;
- multiple documentary sources of BO data; and
- misunderstanding of BO guidelines as most of publicly listed companies have included in their declaration the link to the company website or to the stock exchange website instead of the link to BO disclosure on the stock exchange website.

<sup>1</sup> Government revenues from extractive companies, per revenue stream 2017

Table 1: Analysis of BO data submission

	Companies	Sector	DF 1		DF2				DF 3	Complete data
			Declaration Received?	Signed Declaration?	Companies Data	State Participation	PLC DATA	Legal Ownership DATA	BO Data	
1	Total E&P PNG Ltd	Oil and gas	Yes	Yes	Yes	N A	Yes	Yes	N.A	Yes
2	Gini Energy Ltd	Oil and gas	Yes	Yes	Yes*	N A	Yes	Yes*	Yes	Yes
3	Newcrest PNG 2 Limited	Mining	Yes	Yes	Yes	N A	Yes	Yes	N.A	Yes
4	Lihir Gold Ltd	Mining	Yes	Yes	Yes	N A	Yes	Yes	N.A	Yes
5	Anomaly Ltd	Mining	Yes	Yes	Yes	N A	Yes	Yes	N.A	Yes
6	ExxonMobil PNG Ltd	Oil and gas	Yes	Yes	Yes*	N A	Yes	Yes*	N.A	Yes
7	Ampolex (PNG) Ltd	Oil and gas	Yes	Yes	Yes*	N A	Yes	Yes*	N.A	Yes
8	Ampolex Highlands Ltd	Oil and gas	Yes	Yes	Yes*	N A	Yes	Yes*	N.A	Yes
9	Ampolex (PNG Petroleum) INC	Oil and gas	Yes	Yes	Yes*	N A	Yes	NO	N.A	Yes
10	Esso Highlands Ltd	Oil and gas	Yes	Yes	Yes*	N A	Yes	Yes*	N.A	Yes
11	Esso PNG Juha Ltd	Oil and gas	Yes	Yes	Yes*	N A	Yes	Yes*	N.A	Yes
12	Esso PNG Moran Ltd	Oil and gas	Yes	Yes	Yes*	N A	Yes	Yes*	N.A	Yes
13	ExxonMobil PNG Antelope Limited	Oil and gas	Yes	Yes	Yes*	N A	Yes	Yes*	N.A	Yes
14	Merlin Pacific Oil Co. NL	Oil and gas	Yes	Yes	Yes*	N A	Yes	Yes*	N.A	Yes
15	SPI (210) Limited	Oil and gas	Yes	Yes	Yes*	N A	Yes	Yes*	N.A	Yes
16	SPI (220) Limited	Oil and gas	Yes	Yes	Yes*	N A	Yes	Yes*	N.A	Yes
17	Esso PNG P'nyang Limited	Oil and gas	Yes	Yes	Yes*	N A	Yes	Yes*	N.A	Yes
18	Harmony Gold (PNG) Exploration Limited	Mining	NO	NO	Yes*	N A	Yes*	Yes*	N.A	NO
19	Morobe Consolidated Goldfields Ltd	Mining	NO	NO	Yes*	N A	Yes*	Yes*	N.A	NO
20	Wafi Mining	Mining	NO	NO	Yes*	N A	Yes*	Yes*	N.A	NO
21	Hidden Valley JV	Mining	NO		NO			NO	N.A	NO
22	Santos Hides Limited	Oil and gas	Yes	Yes	Yes	N A	Yes	Yes	N.A	Yes
23	Lavana Ltd	Oil and gas	Yes	Yes	Yes	N A	Yes	Yes*	N.A	Yes
24	Santos P'nyang Limited	Oil and gas	Yes	Yes	Yes	N A	Yes	Yes	N.A	Yes
25	Barracuda Limited	Oil and gas	Yes	Yes	Yes	N A	Yes	Yes	N.A	Yes
26	Barrick (Niugini) Ltd	Mining	NO	NO	Yes*	N A		Yes*	NO	NO
27	Ok Tedi Mining Ltd	Mining	NO	NO	Yes*	Yes*		Yes*	NO	NO
28	Oil Search Ltd	Oil and gas	NO	NO	Yes*			Yes*	NO	NO
29	Kainantu Gold Mine	Mining	NO	NO	NO			NO	NO	NO
30	Niuminco Edie Creek Ltd	Mining	NO	NO	Yes*			Yes*	NO	NO
31	Simberi Gold Co. Ltd	Mining	NO	NO	Yes*			Yes*	NO	NO
32	Harmony PNG 20 Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
33	Morobe Exploration Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
34	Newcrest PNG 3 Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
35	Newcrest PNG Exploration Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
36	Niuminco (ND) Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
37	Upper Ok Tedi Resources Company Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
38	Ok Tedi Foundation	SOE	NO	NO	Yes*			Yes*	NO	NO
39	Frieda River Ltd	Mining	NO	NO	Yes*			Yes*	NO	NO
40	Horizon oil (Papua) Ltd	Oil and gas	NO	NO	Yes*			Yes*	NO	NO
41	K92 Mining Ltd	Mining	NO	NO	Yes*			Yes*	NO	NO



	Companies	Sector	DF 1		DF2				DF 3	Complete data
			Declaration Received?	Signed Declaration?	Companies Data	State Participation	PLC DATA	Legal Ownership DATA	BO Data	
42	MCC Ramu NiCo Ltd	Mining	NO	NO	Yes*			Yes*	NO	NO
43	Mineral Resources Enga Limited	Mining	NO	NO	Yes*	Yes*		Yes*	NO	NO
44	Nautilus Minerals Niugini 3 Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
45	Nautilus Minerals Niugini Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
46	Repsol Oil and Gas Niugini Ltd	Oil and gas	NO	NO	NO			NO	NO	NO
47	Larus Energy (PNG) Ltd	Oil and gas	NO	NO	Yes*			Yes*	NO	NO
48	MKS Ltd	Oil and gas	NO	NO	Yes*			Yes*	NO	NO
49	Rawson Resources Ltd	Oil and gas	NO	NO	NO			NO	NO	NO
50	Kina Petroleum Ltd	Oil and gas	NO	NO	Yes*			Yes*	NO	NO
51	Hillsborough Ltd	Oil and gas	NO	NO	Yes*			Yes*	NO	NO
52	Sandaun Petroleum Energy Development Ltd	Oil and gas	NO	NO	Yes*			Yes*	NO	NO
53	Begesin Petroleum Ltd	Oil and gas	NO	NO	Yes*			Yes*	NO	NO
54	Peak Oil (PNG) Pty Ltd	Oil and gas	NO	NO	Yes*			NO	NO	NO
55	Kapul Petroleum Ltd	Oil and gas	NO	NO	Yes*			Yes*	NO	NO
56	Dondonald Ltd	Oil and gas	NO	NO	Yes*			Yes*	NO	NO
57	Ramu Nickel Ltd	Mining	NO	NO	Yes*			Yes*	NO	NO
58	Tolukuma Gold Mine Ltd	Mining	NO	NO	Yes*			Yes*	NO	NO
59	Woodlark Mining Ltd	Mining	NO	NO	Yes*			Yes*	NO	NO
60	Abundance Valley (PNG) Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
61	Aiabba Minerals (PNG) Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
62	Alexander Mining Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
63	Anglo American Exploration (PNG) Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
64	APAC Mining (PNG) Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
65	Apollo Mineral Resources Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
66	B2GOLD CORP	Mining	NO	NO	Yes*			NO	NO	NO
67	Ballygowan Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
68	Bayawaha Limestone Company Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
69	Biangai Development Corporation	Mining	NO	NO	Yes*			Yes*	NO	NO
70	Bismarck Mining Corporation (PNG) Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
71	Bougainville Copper Pty Ltd	Mining	NO	NO	NO			NO	NO	NO
72	Bulolo Alluvials Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
73	Bungamba (Sankwep) Investments Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
74	Canterbury Resources (PNG) Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
75	Cheroh Mining PNG Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
76	Combuco Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
77	Copper Quest PNG Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
78	Coral Sea Venture Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
79	CRA Minerals (PNG) Limited	Mining	NO	NO	NO			NO	NO	NO
80	Croke Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
81	Dae Han Resources Development Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
82	Dansar Mining 1 Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
83	Eda Kopa (Solwara) Limited	Mining	NO	NO	Yes*			Yes*	NO	NO

	Companies	Sector	DF 1		DF2				DF 3	Complete data
			Declaration Received?	Signed Declaration?	Companies Data	State Participation	PLC DATA	Legal Ownership DATA	BO Data	
84	Edie Alluvial Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
85	EL Dorado Mining and Energy Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
86	Finny Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
87	Footprint Resources Pty Ltd	Mining	NO	NO	Yes*			NO	NO	NO
88	Frontier Copper (PNG) Limited	Mining	NO	NO	NO			NO	NO	NO
89	Gallipoli Exploration (PNG) Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
90	Gama Projex Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
91	GMN 6768 (PNG) Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
92	Golden Valley Enterprise Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
93	Goldfields (PNG) Mining Limited	Mining	NO	NO	NO			NO	NO	NO
94	Hardrock Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
95	Hells Gate Exploration Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
96	Highlands Pacific Resources Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
97	Kallow Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
98	Kawari Wiem Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
99	Khor ENG Hock & Sons (PNG) Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
100	Komomoa Energy Resources PNG Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
101	Kuh Chun Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
102	Kupuyapa Mining Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
103	LogiKon Corporation Pty Ltd	Mining	NO	NO	Yes*			NO	NO	NO
104	Mayur Exploration PNG Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
105	Mayur Industrials PNG Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
106	Mayur Iron PNG Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
107	MB Transport Limited	Mining	NO	NO	NO			NO	NO	NO
108	Mineral Resources Madang Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
109	Mineral Resources Ramu Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
110	Mineral Resources Star Mountain Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
111	Mobile Works Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
112	Munga River Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
113	New Dawn Mining (PNG) Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
114	Nickelex PNG Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
115	Niugini Nickel Limited	Mining	NO	NO	NO			NO	NO	NO
116	Nord Australex Nominees (PNG) Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
117	Oro Nickel Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
118	Pacific Arc Aurum (Niugini) Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
119	Pacific Energy Consulting Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
120	Pacific Niugini Minerals (PNG) Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
121	Papuan Minerals Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
122	PNG Forest Products Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
123	Property New Group Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
124	Reekera Limited	Mining	NO	NO	NO			NO	NO	NO
125	RGC (PNG) Pty Ltd	Mining	NO	NO	NO			NO	NO	NO

	Companies	Sector	DF 1		DF2				DF 3	Complete data
			Declaration Received?	Signed Declaration?	Companies Data	State Participation	PLC DATA	Legal Ownership DATA	BO Data	
126	Rik Holdings Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
127	Rio Tinto Exploration (PNG) Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
128	Ruino Brothers Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
129	Solway Group Mining (PNG) Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
130	Sudest Island Mining Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
131	Sumwari Sino PNG Gold Resources Development Co Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
132	Tribune Mount Kare Gold Limited	Mining	NO	NO	NO			NO	NO	NO
133	Viva Gold (PNG) Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
134	Viva No. 20 Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
135	Wabu Alluvials Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
136	Waterford Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
137	West Coast Mining Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
138	WNB Resources Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
139	Yandera Mining Company Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
140	Zhong Rui Kuang Ye (PNG) Co. Limited	Mining	NO	NO	Yes*			Yes*	NO	NO
141	JX Nippon Oil and Gas Exploration Corporation	Oil and gas	NO	NO	NO			NO	NO	NO
142	Kumul Petroleum Holdings	SOE	NO	NO	NO			NO	NO	NO
143	Kumul Consolidated Holdings	SOE	NO	NO	NO			NO	NO	NO
144	Kumul Mineral Holdings	SOE	NO	NO	NO			NO	NO	NO
145	MRDC	SOE	NO	NO	NO			NO	NO	NO

**Yes** : Information submitted by reporting entities

**Yes\*** : Information not submitted but collected From IPA website and other sources

**NO** : Information not submitted

### 3.2. Analyses of BO data collected

The company , legal ownership and BO compiled data are presented in the tables below :

**Table 2: Company data**

No.	Company	Sector	Source	Country of registration	Unique identification number	Registration authority	Contact address (registered office)
1	Total E&P PNG Ltd	Oil and gas	YES	PNG	1-32894	IPA	Level 7, Deloitte Haus, Mac Gregor Street CBD P.O. Box 1145 Port Moresby
2	Gini Energy Ltd	Oil and gas	Yes*	PNG	1-70498	IPA	Suite 11, Section , Allotment 05, Building 1, Cameron Road, Hohola, National Capital District, Papua New Guinea
3	Newcrest PNG 2 Limited	Mining	YES	PNG	1-62605	IPA	2nd Floor, Brian Bell Plaza, Turumu Street, Boroko, NCD 111, PNG
4	Lihir Gold Ltd	Mining	YES	PNG	1-23423	IPA	2nd Floor, Brian Bell Plaza, Turumu Street, Boroko, NCD 111, PNG
5	Anomaly Ltd	Mining	YES	PNG	1-56947	IPA	C/- Sinton Spence Chartered Accountants, 2nd Floor, Brian Bell Plaza, Turumu Street, NCD, PNG
6	ExxonMobil PNG Ltd	Oil and gas	Yes*	PNG	1-18948	IPA	Ashurst Png, Level 11 Mrdc Haus, Cnr Of Musgrave Street and Champion Parade, Port Moresby, National Capital District PNG
7	Ampolex (PNG) Ltd	Oil and gas	Yes*	PNG	1-9385	IPA	Ashurst Png, Level 11 Mrdc Haus, Cnr Of Musgrave Street and Champion Parade, Port Moresby, National Capital District PNG
8	Ampolex Highlands Ltd	Oil and gas	Yes*	PNG	1-16225	IPA	Ashurst Png, Level 11 Mrdc Haus, Cnr Of Musgrave Street and Champion Parade, Port Moresby, National Capital District PNG
9	Ampolex (PNG Petroleum) INC	Oil and gas	Yes*	PNG	3-10965	IPA	Ashurst Png, Level 11 Mrdc Haus, Cnr Of Musgrave Street and Champion Parade, Port Moresby, National Capital District PNG
10	Esso Highlands Ltd	Oil and gas	Yes*	PNG	1-18948	IPA	Ashurst Png, Level 11 Mrdc Haus, Cnr Of Musgrave Street and Champion Parade, Port Moresby, National Capital District PNG
11	Esso PNG Juha Ltd	Oil and gas	Yes*	PNG	1-55618	IPA	Ashurst Png, Level 11 Mrdc Haus, Cnr Of Musgrave Street and Champion Parade, Port Moresby, National Capital District PNG
12	Esso PNG Moran Ltd	Oil and gas	Yes*	PNG	1-59195	IPA	Ashurst Png, Level 11 Mrdc Haus, Cnr Of Musgrave Street and Champion Parade, Port Moresby, National Capital District PNG
13	ExxonMobil PNG Antelope Limited	Oil and gas	Yes*	PNG	1-31349	IPA	Ashurst Png, Level 11 Mrdc Haus, Cnr Of Musgrave Street and Champion Parade, Port Moresby, National Capital District PNG
14	Merlin Pacific Oil Co. NL	Oil and gas	Yes*	PNG	1-11149	IPA	Ashurst Png, Level 11 Mrdc Haus, Cnr Of Musgrave Street and Champion Parade, Port Moresby, National Capital District PNG

No.	Company	Sector	Source	Country of registration	Unique identification number	Registration authority	Contact address (registered office)
15	SPI (210) Limited	Oil and gas	Yes*	PNG	1-31348	IPA	Ashurst Png, Level 11 Mrdc Haus, Cnr Of Musgrave Street and Champion Parade, Port Moresby, National Capital District PNG
16	SPI (220) Limited	Oil and gas	Yes*	PNG	1-32891	IPA	Ashurst Png, Level 11 Mrdc Haus, Cnr Of Musgrave Street and Champion Parade, Port Moresby, National Capital District PNG
17	Esso PNG P'nyang Limited	Other	Yes*	PNG	1-55617	IPA	Ashurst Png, Level 11 Mrdc Haus, Cnr Of Musgrave Street and Champion Parade, Port Moresby, National Capital District PNG
18	Harmony Gold (PNG) Exploration Limited	Mining	Yes*	PNG	1-56826	IPA	Ashurst Png, Level 11 Mrdc Haus, Cnr Of Musgrave Street and Champion Parade, Port Moresby, National Capital District PNG
19	Morobe Consolidated Goldfields Ltd	Mining	Yes*	PNG	1-12047	IPA	Ashurst Png, Level 11 Mrdc Haus, Cnr Of Musgrave Street and Champion Parade, Port Moresby, National Capital District, Papua New Guinea
20	Wafi Mining	Mining	Yes*	PNG	1-11452	IPA	Ashurst Png, Level 11 Mrdc Haus, Cnr Of Musgrave Street and Champion Parade, Port Moresby, National Capital District, Papua New Guinea
21	Hidden Valley JV	Mining	NO				
22	Santos Hides Limited	Other	Yes	PNG	1-30340	IPA	C/- Pacific Legal Group Lawyers, Ground Floor-laraguma Haus, Section 30, Allotment 38, Cameron Road, Hohola (Gordons), Port Moresby, National Capital District, Papua New Guinea
23	Lavana Ltd	Other	Yes	PNG	1-32230	IPA	C/- Pacific Legal Group Lawyers, Ground Floor-laraguma Haus, Section 30, Allotment 38, Cameron Road, Hohola (Gordons), Port Moresby, National Capital District, Papua New Guinea
24	Santos P'nyang Limited	Other	Yes	PNG	1-11440	IPA	C/- Pacific Legal Group Lawyers, Ground Floor-laraguma Haus, Section 30, Allotment 38, Cameron Road, Hohola (Gordons), Port Moresby, National Capital District, Papua New Guinea
25	Barracuda Limited	Other	Yes	PNG	1-14694	IPA	C/- Pacific Legal Group Lawyers, Ground Floor-laraguma Haus, Section 30, Allotment 38, Cameron Road, Hohola (Gordons), Port Moresby, National Capital District, Papua New Guinea
26	Barrick (Niugini) Ltd	Mining	Yes*	PNG	1-11031	IPA	Ashurst Png, Level 11 Mrdc Haus, Cnr Of Musgrave Street and Champion Parade, Port Moresby, National Capital District PNG
27	Ok Tedi Mining Ltd	Mining	Yes*	PNG	1-6233	IPA	Dakon Road, Tabubil, Western Province, PNG
28	Oil Search Ltd	Oil and gas	Yes*	PNG	1-125	IPA	Ground Floor, Harbourside East Building, Stanley Esplanade, Port Moresby, National Capital District, Papua New Guinea
29	Kainantu Gold Mine	Mining	NO				



No.	Company	Sector	Source	Country of registration	Unique identification number	Registration authority	Contact address (registered office)
30	Niuminco Edie Creek Ltd	Mining	Yes*	PNG	1-57284	IPA	Unit 3, Level 1, Nambawan Super Haus, 2nd Street, Lae, Morobe Province, 411, Papua New Guinea
31	Simberi Gold Co. Ltd	Mining	Yes*	PNG	1-26598	IPA	Ashurst Png, Level 11 Mrdc Haus, Cnr Of Musgrave Street and Champion Parade, Port Moresby, National Capital District, Papua New Guinea
32	Harmony PNG 20 Limited	Mining	Yes*	PNG	1-62603	IPA	Ashurst Png, Level 4, Mogoru Moto Building, Champion Parade, Port Moresby, National Capital District, Papua New Guinea
33	Morobe Exploration Limited	Mining	Yes*	PNG	1-63559	IPA	Ashurst Png, Level 11 Mrdc Haus, Cnr Of Musgrave Street and Champion Parade, Port Moresby, National Capital District, Papua New Guinea
34	Newcrest PNG 3 Limited	Mining	Yes*	PNG	1-62606	IPA	Sinton Spence Chartered Accountants, 2nd Floor, Brian Bell Plaza, Turumu Street, Boroko, National Capital District, Papua New Guinea
35	Newcrest PNG Exploration Limited	Mining	Yes*	PNG	1-76015	IPA	Sinton Spence Chartered Accountants, 2nd Floor Brian Bell Plaza, Turumu Street, Boroko, National Capital District, Papua New Guinea
36	Niuminco (ND) Limited	Mining	Yes*	PNG	1-56944	IPA	Unit 3, Level 1, Nambawan Super Haus, 2nd Street, Lae, Morobe Province, 411, Papua New Guinea
37	Upper Ok Tedi Resources Company Limited	Mining	Yes*	PNG	1-109715	IPA	Ningerum Llg Building, Ground Floor, United 01, Ningerum District, Tabubil, Western Province, Papua New Guinea
38	Ok Tedi Foundation	SOE	Yes*	-			
39	Frieda River Ltd	Mining	Yes*	PNG	1-58096	IPA	Dentons Png, Level 5, Bsp Haus, Harbour City, Konedobu, National Capital District, Papua New Guinea
40	Horizon Oil (Papua) Ltd	Oil and gas	Yes*	PNG	3-24330	IPA	Horizon Oil (papua) Limited, Level 3, Pacific Place, Cnr Musgrave Street & Champion Parade, Port Moresby, National Capital District, Papua New Guinea
41	K92 Mining Ltd	Mining	Yes*	PNG	1-52231	IPA	Level 6, Pwc Haus, Harbour City, Port Moresby, National Capital District, 121, Papua New Guinea
42	MCC Ramu NiCo Ltd	Mining	Yes*	PNG	1-54528	IPA	Posman Kua Aisi Lawyers, Level 1, Mogoru Moto Building, Port Moresby, National Capital District, Papua New Guinea
43	Mineral Resources Enga Limited	Mining	Yes*	PNG	1-32087	IPA	Level 12, Pacific Place, Corner of Musgrave Street, Champion Parade, Port Moresby, National Capital District, Papua New Guinea
44	Nautilus Minerals Niugini 3 Limited	Mining	Yes*	PNG	1-58070	IPA	Flat 91 Section 117, Allotment 7, Kanage Street 6 Mile, Port Moresby, National Capital District, Papua New Guinea

No.	Company	Sector	Source	Country of registration	Unique identification number	Registration authority	Contact address (registered office)
45	Nautilus Minerals Niugini Limited	Mining	Yes*	PNG	1-24459	IPA	Flat 91 Section 117, Allotment 7, Kanage Street 6 Mile, Port Moresby, National Capital District, Papua New Guinea
46	Repsol Oil and Gas Niugini Ltd	Oil and gas	NO				
47	Larus Energy (PNG) Ltd	Oil and gas	Yes*	PNG	1-59266	IPA	C/- Sinton Spence Chartered Accountants, 2nd Floor, Brian Bell Plaza, Turumu Street, Boroko, National Capital District, Papua New Guinea
48	MKS Ltd	Oil and gas	Yes*	PNG	1-59678	IPA	Section 43, Allotment 4, Alotau, Milne Bay Province, Papua New Guinea
49	Rawson Resources Ltd	Oil and gas	NO				
50	Kina Petroleum Ltd	Oil and gas	Yes*	PNG	1-63551	IPA	Level 10, Pacific Place, Corner of Musgrave Street and Champion Parade, Port Moresby, National Capital District, Papua New Guinea
51	Hillsborough Ltd	Oil and gas	Yes*	PNG	1-61557	IPA	Sinton Spence Chartered Accountants, 2nd Floor, Brian Bell Plaza, Turumu St, Boroko, National Capital District, Papua New Guinea
52	Sandaun Petroleum Energy Development Ltd	Oil and gas	Yes*	PNG	1-88129	IPA	Section 47, Allotment 50, North Waigani, Pitpit Street, Port Moresby, National Capital District, Papua New Guinea
53	Begesin Petroleum Ltd	Oil and gas	Yes*	PNG	1-102225	IPA	Section 12, Allotment 04, Madang, Madang Province, Papua New Guinea
54	Peak Oil (PNG) Pty Ltd	Oil and gas	Yes*	PNG	3-68746	IPA	C/- Dfk Mayberry, Level 5, Avara Annex Building, Brampton St, Port Moresby, National Capital District, Papua New Guinea
55	Kapul Petroleum Ltd	Oil and gas	Yes*	PNG	1-113447	IPA	Section 86, Allotment 11, Ganigo Street, Gordons, National Capital District, Papua New Guinea
56	Dondonald Ltd	Oil and gas	Yes*	PNG	1-107292	IPA	Sinton Spence Chartered Accountants, 2nd Floor, Brian Bell Plaza, Turumu Street, Boroko, National Capital District, Papua New Guinea
57	Ramu Nickel Ltd	Mining	Yes*	PNG	1-26890	IPA	Level 5, Office 3, Monian Tower, Douglas Street, Port Moresby, National Capital District, Papua New Guinea
58	Tolukuma Gold Mine Ltd	Mining	Yes*	PNG	1-16395	IPA	Level 1, Petromin Haus, Ground Floor, Section 45, Allotment 4, Hubert Murray Highway, Port Moresby, National Capital District, Papua New Guinea
59	Woodlark Mining Ltd	Mining	Yes*	PNG	1-57121	IPA	O'Briens, Level 6, Pwc Haus, Harbour City, Port Moresby, National Capital District, Papua New Guinea
60	Abundance Valley (PNG) Limited	Mining	Yes*	PNG	1-116306	IPA	Unit 103, 1st Floor, Lot 19, Section 406, Waigani, National Capital District, Papua New Guinea
61	Aiabba Minerals (PNG) Limited	Mining	Yes*	PNG	1-108987	IPA	Section 40, Allotment 31, Munga Street, Mt Hagen, Western Highlands Province, Papua New Guinea

No.	Company	Sector	Source	Country of registration	Unique identification number	Registration authority	Contact address (registered office)
62	Alexander Mining Limited	Mining	Yes*	PNG	1-78482	IPA	Section 5, Allotment 10, Karius Street, Gabutu, National Capital District, Papua New Guinea
63	Anglo American Exploration (PNG) Limited	Mining	Yes*	PNG	1-113582	IPA	C/- Pacific Legal Group Lawyers, Ground Floor, Iaraguma Haus, Section 38, Allotment 30, Off Cameron Road, Gordons, National Capital District, Papua New Guinea
64	APAC Mining (PNG) Limited	Mining	Yes*	PNG	1-117897	IPA	Section 490, Allotment 14, Telikom Compound, Waigani, Waigani, National Capital District, Papua New Guinea
65	Apollo Mineral Resources Limited	Mining	Yes*	PNG	1-11287	IPA	Section 56, Allotment 13, Boio Street, Boroko, National Capital District, Papua New Guinea
66	B2GOLD CORP	Mining	Yes*	PNG	3-119321	IPA	
67	Ballygowan Limited	Mining	Yes*	PNG	1-107968	IPA	Sinton Spence Chartered Accountants, 2nd Floor, Brian Bell Plaza, Turumu Street, Boroko, National Capital District, Papua New Guinea
68	Bayawaha Limestone Company Limited	Mining	Yes*	PNG	1-7064	IPA	The Offices of Tengdui & Associates, Section 26, Allotment 1, Bay 19b, Agc Haus, Hagen Drive, Mount Hagen, Western Highlands Province, Papua New Guinea
69	Biangai Development Corporation	Mining	Yes*	PNG	1-16280	IPA	Section 1, Allotment A, Nangamanga Building, Wau, Morobe Province, Papua New Guinea
70	Bismarck Mining Corporation (PNG) Limited	Mining	Yes*	PNG	1-56633	IPA	C/- Dfk Mayberry Chartered Accountants, Level 5, Avara Annex Building, Brampton Street, Port Moresby, National Capital District, 121, Papua New Guinea
71	Bougainville Copper Pty Ltd	Mining	NO				
72	Bulolo Alluvials Limited	Mining	Yes*	PNG	1-1304	IPA	Section 49, Allotment 9, Ipi Building, 2nd Street, Lae, Morobe Province, Papua New Guinea
73	Bungamba (Sankwep) Investments Limited	Mining	Yes*	PNG	1-119229	IPA	Section 339, Allotment 39, Tenth City, Lae, Morobe Province, Papua New Guinea
74	Canterbury Resources (PNG) Limited	Mining	Yes*	PNG	1-86939	IPA	Sinton Spence Chartered Accountants, 2nd Floor, Brian Bell Plaza, Turumu Street, Boroko, National Capital District, Papua New Guinea
75	Cheroh Mining PNG Limited	Mining	Yes*	PNG	1-107492	IPA	Claim 269 Vada Road, Taurama, National Capital District, Papua New Guinea
76	Combuco Limited	Mining	Yes*	PNG	1-112587	IPA	Section 161, Allotment 80, Sky View, Ats, 7 Mile, National Capital District, Papua New Guinea
77	Copper Quest PNG Limited	Mining	Yes*	PNG	1-58812	IPA	Sinton Spence Chartered Accountants, 2nd Floor, Brian Bell Plaza, Turumu Street, Boroko, National Capital District, Papua New Guinea
78	Coral Sea Venture Limited	Mining	Yes*	PNG	1-111380	IPA	C/o Jack Pupu, Sam Bonner Lawyers, Level 2, Ori Lavi Haus, Turumu Street, Boroko, Port Moresby, National Capital District, Papua New Guinea
79	CRA Minerals (PNG) Limited	Mining	NO				

No.	Company	Sector	Source	Country of registration	Unique identification number	Registration authority	Contact address (registered office)
80	Croke Limited	Mining	Yes*	PNG	1-117878	IPA	C/- Sinton Spence Chartered Accountants, 2nd Floor, Brian Bell Plaza, Turumu Street, Boroko, National Capital District, Papua New Guinea
81	Dae Han Resources Development Limited	Mining	Yes*	PNG	1-44216	IPA	Suite No. 02, Level 2 First Heritage Centre, Waigani, National Capital District, Papua New Guinea
82	Dansar Mining 1 Limited	Mining	Yes*	PNG	1-110586	IPA	Section 6, Allotment 133, Deboma Street, Gerehu, National Capital District, Papua New Guinea
83	Eda Kopa (Solwara) Limited	Mining	Yes*	PNG	1-77936	IPA	Section 45, Allotment 4, Level 3, Petromin Haus, 2 Mile, National Capital District, Papua New Guinea
84	Edie Alluvial Limited	Mining	Yes*	PNG	1-465	IPA	Section 51, Allotment 39, Airvos Avenue, Port Moresby, National Capital District, Papua New Guinea
85	EL Dorado Mining and Energy Limited	Mining	Yes*	PNG	1-107615	IPA	C/- Sinton Spence Chartered Accountants, 2nd Floor, Brian Bell Plaza, Turumu Street, Boroko, National Capital District, Papua New Guinea
86	Finny Limited	Mining	Yes*	PNG	1-104673	IPA	Sinton Spence Chartered Accountants, 2nd Floor, Brian Bell Plaza, Turumu Street, Boroko, National Capital District, Papua New Guinea
87	Footprint Resources Pty Ltd	Mining	Yes*	PNG	3-109116	IPA	
88	Frontier Copper (PNG) Limited	Mining	NO				
89	Gallipoli Exploration (PNG) Limited	Mining	Yes*	PNG	1-55847	IPA	Pacific Legal Group Lawyers, Ground Floor, Investwell Building, Section 38, Allotment 30, (off Cameron Road), Gordons, National Capital District, Papua New Guinea
90	Gama Projex Limited	Mining	Yes*	PNG	1-73477	IPA	Offices Of Pokarup & Morton, Unit 9 Section 41 Allotment 5, Bava Street, Boroko, National Capital District, Papua New Guinea
91	GMN 6768 (PNG) Limited	Mining	Yes*	PNG	1-107904	IPA	Unit 103, Lot 19, Section 406, Lamana Residences, Waigani, National Capital District, Papua New Guinea
92	Golden Valley Enterprise Limited	Mining	Yes*	PNG	1-48696	IPA	Section 16, Allotment 03, Corner Milforhaven Road & Marsina Street, Lae, Morobe Province, Papua New Guinea
93	Goldfields (PNG) Mining Limited	Mining	NO				
94	Hardrock Limited	Mining	Yes*	PNG	1-119358	IPA	Sinton Spence Chartered Accountants, 2nd Floor, Brian Bell Plaza, Turumu Street, Boroko, National Capital District, Papua New Guinea
95	Hells Gate Exploration Limited	Mining	Yes*	PNG	1-56631	IPA	O'Briens Lawyers, Level 6, Pwc Haus, Harbour City, Port Moresby, National Capital District, Papua New Guinea
96	Highlands Pacific Resources Limited	Mining	Yes*	PNG	1-11862	IPA	Level 5, Office 3, Monian Tower, Douglas Street, Port Moresby, National Capital District, Papua New Guinea

No.	Company	Sector	Source	Country of registration	Unique identification number	Registration authority	Contact address (registered office)
97	Kallow Limited	Mining	Yes*	PNG	1-58987	IPA	Section 147, Allotment 51, Tokarara, National Capital District, Papua New Guinea
98	Kawari Wiem Limited	Mining	Yes*	PNG	1-83034	IPA	Section 41, Allotment 003, Warbler Place, Waigani, National Capital District, Papua New Guinea
99	Khor ENG Hock & Sons (PNG) Limited	Mining	Yes*	PNG	1-12622	IPA	Section 64, Allotment 8, Gabaka Street, Gordons, National Capital District, Papua New Guinea
100	Komomoa Energy Resources PNG Limited	Mining	Yes*	PNG	1-100637	IPA	C/- Nka Chartered Accountants, Suite 8, Level 2, Ori Lavi Building, Turumu Street, Boroko, National Capital District, 111, Papua New Guinea
101	Kuh Chun Limited	Mining	Yes*	PNG	1-81539	IPA	Section 37, Allotment 2, Alamanda Crescent, Madang, Madang Province, Papua New Guinea
102	Kupuyapa Mining Limited	Mining	Yes*	PNG	1-116160	IPA	Section 204, Allotment 51, Jabiru Drive, Gordons, National Capital District, Papua New Guinea
103	LogiKon Corporation Pty Ltd	Mining	Yes*	PNG	3-112112	IPA	
104	Mayur Exploration PNG Limited	Mining	Yes*	PNG	1-78746	IPA	Sinton Spence Chartered Accountants, 2nd Floor, Brian Bell Plaza, Turumu Street, Boroko, National Capital District, Papua New Guinea
105	Mayur Industrials PNG Limited	Mining	Yes*	PNG	1-100509	IPA	Sinton Spence Chartered Accountants, 2nd Floor, Brian Bell Plaza, Turumu Street, Boroko, National Capital District, Papua New Guinea
106	Mayur Iron PNG Limited	Mining	Yes*	PNG	1-80057	IPA	Sinton Spence Chartered Accountants, 2nd Floor, Brian Bell Plaza, Turumu Street, Boroko, National Capital District, Papua New Guinea
107	MB Transport Limited	Mining	NO				
108	Mineral Resources Madang Limited	Mining	Yes*	PNG	1-53439	IPA	Level 12, Mrdc Haus Building, Corner Of Musgrave Street & Champion Parade, Port Moresby, National Capital District, 121, Papua New Guinea
109	Mineral Resources Ramu Limited	Mining	Yes*	PNG	1-36654	IPA	Level 12, Pacific Place, Corner Of Musgrave Street, Champion Parade, Port Moresby, National Capital District, Papua New Guinea
110	Mineral Resources Star Mountain Limited	Mining	Yes*	PNG	1-27147	IPA	Level 12, Pacific Place, Corner Of Musgrave Street, Champion Parade, Port Moresby, National Capital District, Papua New Guinea
111	Mobile Works Limited	Mining	Yes*	PNG	1-63916	IPA	Portion 527, Markham Rd, Lae, Morobe Province, Papua New Guinea
112	Munga River Limited	Mining	Yes*	PNG	1-86592	IPA	Section 43, Allotment 83, Kupanda Street, Mount Hagen, Western Highlands Province, Papua New Guinea
113	New Dawn Mining (PNG) Limited	Mining	Yes*	PNG	1-120465	IPA	Allotment 07, Section 41, 12 Warbler Place, Waigani, Ncd, Png, Port Moresby, National Capital District, 121, Papua New Guinea
114	Nickelex PNG Limited	Mining	Yes*	PNG	1-119126	IPA	Section 204, Allotment 51, Jabiru Drive, Gordons, National Capital District, Papua New Guinea



No.	Company	Sector	Source	Country of registration	Unique identification number	Registration authority	Contact address (registered office)
115	Niugini Nickel Limited	Mining	NO				
116	Nord Australex Nominees (PNG) Limited	Mining	Yes*	PNG	1-7115	IPA	Ashurst Png, Level 11 Mrdc Haus, Cnr Of Musgrave Street and Champion Parade, Port Moresby, National Capital District, Papua New Guinea
117	Oro Nickel Limited	Mining	Yes*	PNG	1-52559	IPA	Sinton Spence Chartered Accountants, 2nd Floor, Brian Bell Plaza, Turumu St, Boroko, National Capital District, Papua New Guinea
118	Pacific Arc Aurum (Niugini) Limited	Mining	Yes*	PNG	1-115558	IPA	Sinton Spence Chartered Accountants, 2nd Floor, Brian Bell Plaza, Turumu Street, Boroko, National Capital District, Papua New Guinea
119	Pacific Energy Consulting Limited	Mining	Yes*	PNG	1-100047	IPA	Level 2, Pacific Place, Cnr. Champion Parade & Musgrave Street, Port Moresby, National Capital District, Papua New Guinea
120	Pacific Niugini Minerals (PNG) Limited	Mining	Yes*	PNG	1-56905	IPA	Sinton Spence Chartered Accountants, 2nd Floor, Brian Bell Plaza, Turumu Street, Boroko, National Capital District, Papua New Guinea
121	Papuan Minerals Limited	Mining	Yes*	PNG	1-85441	IPA	Sinton Spence Chartered Accountants, 2nd Floor, Brian Bell Plaza, Turumu Street, Boroko, National Capital District, Papua New Guinea
122	PNG Forest Products Limited	Mining	Yes*	PNG	1-303	IPA	Portion 483, Huxley Street, Milinch Of Bulolo, Fourmil Of Wau, Lae, Morobe Province, 411, Papua New Guinea
123	Property New Group Limited	Mining	Yes*	PNG	1-76658	IPA	Unit 3c, Block 2, Allotment 33,, Section 26, Hohola, Port Moresby, National Capital District, Papua New Guinea
124	Reekera Limited	Mining	NO				
125	RGC (PNG) Pty Ltd	Mining	NO				
126	Rik Holdings Limited	Mining	Yes*	PNG	1-22452	IPA	Sterling Chase Plantation, Portion 251, Wau, Morobe Province, 422, Papua New Guinea
127	Rio Tinto Exploration (PNG) Limited	Mining	Yes*	PNG	1-16359	IPA	Bdo, Section 15, Allotment 15, Bernal Street, Port Moresby, National Capital District, Papua New Guinea
128	Ruino Brothers Limited	Mining	Yes*	PNG	1-23350	IPA	Coopers & Lybrand, Second Floor, Ang Haus, Central Avenue, Lae, Morobe Province, Papua New Guinea
129	Solway Group Mining (PNG) Limited	Mining	Yes*	PNG	1-102567	IPA	Level 5, Pacific Place, Cnr Musgrave Street & Champion Parade, Port Moresby, National Capital District, Papua New Guinea
130	Sudest Island Mining Limited	Mining	Yes*	PNG	1-114566	IPA	Ashurst Png, Level 11 Mrdc Haus, Cnr Of Musgrave Street and Champion Parade, Port Moresby, National Capital District, Papua New Guinea
131	Sumwari Sino PNG Gold Resources Development Co Limited	Mining	Yes*	PNG	1-117618	IPA	Section 507, Allotment 44, Rainbow Height, Hohola, National Capital District, Papua New Guinea

No.	Company	Sector	Source	Country of registration	Unique identification number	Registration authority	Contact address (registered office)
132	Tribune Mount Kare Gold Limited	Mining	NO				
133	Viva Gold (PNG) Limited	Mining	Yes*	PNG	1-116362	IPA	Unit 103, 1st Floor, Lot 19, Section 406, Waigani, National Capital District, Papua New Guinea
134	Viva No. 20 Limited	Mining	Yes*	PNG	1-72150	IPA	Unit 103, Lot 13, Section 406, Lamana Residences, Waigani, National Capital District, 131, Papua New Guinea
135	Wabu Alluvials Limited	Mining	Yes*	PNG	1-115024	IPA	Section 16, Allotment 3, Marsina Street, Milforf Haven Road, Lae, Morobe Province, Papua New Guinea
136	Waterford Limited	Mining	Yes*	PNG	1-68506	IPA	Sinton Spence Chartered Accountants, 2nd Floor, Brian Bell Plaza, Turumu Street, Boroko, National Capital District, Papua New Guinea
137	West Coast Mining Limited	Mining	Yes*	PNG	1-87540	IPA	Section 13, Allotment 1, Hubert Murray, Port Moresby, National Capital District, Papua New Guinea
138	WNB Resources Limited	Mining	Yes*	PNG	1-90565	IPA	Sinton Spence Chartered Accountants, 2nd Floor, Brian Bell Plaza, Turumu Street, Boroko, National Capital District, Papua New Guinea
139	Yandera Mining Company Limited	Mining	Yes*	PNG	1-53202	IPA	Allens Arthur Robinson, Level 6, Mogoru Moto Building, Champion Parade, Section 20, Allotment 13, Granville, Port Moresby, National Capital District, Papua New Guinea
140	Zhong Rui Kuang Ye (PNG) Co. Limited	Mining	Yes*	PNG	1-116818	IPA	Section 25, Allotment 03, Brampton Street, Port Moresby, National Capital District, Papua New Guinea
141	JX Nippon Oil and Gas Exploration Corporation	Oil and gas	NO				
142	Kumul Petroleum Holdings	SOE	NO	-			
143	Kumul Consolidated Holdings	SOE	NO	-			
144	Kumul Mineral Holdings	SOE	NO	-			
145	MRDC	SOE	NO	-			

Table 3: Legal ownership data

No.	Company	Sector	Source	Full name of direct shareholder(s)	% interest	Shareholder Is	Country or nationality	Unique ID number	Publicly listed
1	Total E&P PNG Ltd	Oil and gas	YES	TOTAL HOLDINGS INTERNATIONAL BV	100%	legal person (LP)	Netherlands-NL	54265258	
2	Gini Energy Ltd	Oil and gas	Yes*	PNG ENERGY LIMITED	100%	legal person (LP)	Australia-AU	3-83904	
3	Newcrest PNG 2 Limited	Mining	YES	NEWCREST INTERNATIONAL PTY LIMITED	100%	legal person (LP)	Australia-AU	54 007 449 194	
4	Lihir Gold Ltd	Mining	YES	NEWCREST MINING LIMITED	100%	legal person (LP)	Australia-AU	3-74770	Yes
5	Anomaly Ltd	Mining	YES	Crater Gold Mining Limited - ASX:CGN	100%	legal person (LP)	Australia-AU	67519779	Yes

No.	Company	Sector	Source	Full name of direct shareholder(s)	% interest	Shareholder Is	Country or nationality	Unique ID number	Publicly listed
6	ExxonMobil PNG Ltd	Oil and gas	Yes*	MOBIL PNG GAS HOLDINGS PTY LTD	82%	legal person (LP)	Australia-AU	35008633707	
			Yes*	EXXON OVERSEAS INVESTMENT CORPORATION	18%	legal person (LP)	United States-US	790650	
7	Ampolex (PNG) Ltd	Oil and gas	Yes*	MOBIL PNG PTY LTD	99%	legal person (LP)	Australia-AU	12002658228	
			Yes*	ESSO PNG INVESTMENTS (JUHA) LIMITED	1%	legal person (LP)	Bahamas-BS		
8	Ampolex Highlands Ltd	Oil and gas	Yes*	MOBIL PNG PTY LTD	100%	legal person (LP)	Australia-AU	12002658228	
10	Esso Highlands Ltd	Oil and gas	Yes*	MOBIL PNG GAS HOLDINGS PTY LTD	82%	legal person (LP)	Australia-AU	35 008 633707	
			Yes*	EXXON OVERSEAS INVESTMENT CORPORATION	18%	legal person (LP)	United States-US	790650	
11	Esso PNG Juha Ltd	Oil and gas	Yes*	EXXON OVERSEAS INVESTMENT CORPORATION	44%	legal person (LP)	United States-US	790650	
			Yes*	ESSO PNG INVESTMENTS (JUHA) LIMITED	55%	legal person (LP)	PNG	1-55618	
			Yes*	ESSO EXPLORATION HOLDINGS INC.	0%	legal person (LP)			
12	Esso PNG Moran Ltd	Oil and gas	Yes*	MOBIL PNG GAS HOLDINGS PTY LTD	1%	legal person (LP)	Australia-AU	35 008 633707	
			Yes*	EXXON OVERSEAS INVESTMENT CORPORATION	99%	legal person (LP)	United States-US	790650	
13	ExxonMobil PNG Antelope Limited	Oil and gas	Yes*	S.P.I. EXPLORATION AND PRODUCTION CORPORATION	100%	legal person (LP)	Bahamas-BS	Not Supplied	
14	Merlin Pacific Oil Co. NL	Oil and gas	Yes*	MOBIL PNG PTY LTD	100%	legal person (LP)	Australia-AU	Not Supplied	
15	SPI (210) Limited	Oil and gas	Yes*	S.P.I. EXPLORATION AND PRODUCTION CORPORATION	100%	legal person (LP)	Bahamas-BS	Not Supplied	
16	SPI (220) Limited	Oil and gas	Yes*	S.P.I. EXPLORATION AND PRODUCTION CORPORATION	100%	legal person (LP)	Bahamas-BS	Not Supplied	
17	Esso PNG P'nyang Limited	Other	Yes*	EXXON OVERSEAS INVESTMENT CORPORATION	27%	legal person (LP)	United States-US	790650	
			Yes*	ESSO EXPLORATION HOLDINGS INC.	73%	legal person (LP)			
18	Harmony Gold (PNG) Exploration Limited	Mining	Yes*	HARMONY GOLD (PNG SERVICES) PTY LIMITED	100%	legal person (LP)	Australia-AU	23 083 828853	
19	Morobe Consolidated Goldfields Ltd	Mining	Yes*	HARMONY GOLD (PNG SERVICES) PTY LIMITED	100%	legal person (LP)	PNG	1-12047	Yes
			Yes*	AURORA GOLD PNG PTY LTD	0%	legal person (LP)	Australia-AU	83828853	
20	Wafi Mining	Mining	Yes*	AURORA GOLD (WAFI) PTY LTD	100%	legal person (LP)			
22	Santos Hides Limited	Other	YES	SANTOS INTERNATIONAL HOLDINGS PTY LTD	100%	legal person (LP)	Australia-AU	57 057 585869	
23	Lavana Ltd	Other	Yes*	SANTOS INTERNATIONAL HOLDINGS PTY LTD	100%	legal person (LP)			
			YES	SANTOS INTERNATIONAL HOLDINGS PTY LTD	100%	legal person (LP)	Australia-AU	57 057 585869	
24	Santos P'nyang Limited	Other	YES	SANTOS INTERNATIONAL HOLDINGS PTY LTD	100%	legal person (LP)	Australia-AU	57 057 585869	

No.	Company	Sector	Source	Full name of direct shareholder(s)	% interest	Shareholder Is	Country or nationality	Unique ID number	Publicly listed
25	Barracuda Limited	Other	YES	SANTOS INTERNATIONAL HOLDINGS PTY LTD	100%	legal person (LP)	Australia-AU	57 057 585 869	
26	Barrick (Niugini) Ltd	Mining	Yes*	GOLD MOUNTAINS (H.K.) INTERNATIONAL MINING COMPANY LIMITED	50%	legal person (LP)	Hong Kong-HK		
			Yes*	BARRICK (PD) AUSTRALIA PTY LIMITED	50%	legal person (LP)	Austria-AT		
27	Ok Tedi Mining Ltd	Mining	Yes*	THE INDEPENDENT STATE OF PAPUA NEW GUINEA	67%	State entity	PNG		
			Yes*	MINERAL RESOURCES STAR MOUNTAINS LIMITED	9%	legal person (LP)	PNG	1-27147	
			Yes*	MINERAL RESOURCES OK TEDI NO.2 LIMITED	12%	legal person (LP)	PNG	1-27966	
			Yes*	MINERAL RESOURCES CMCA HOLDINGS LIMITED	12%	legal person (LP)	PNG	1-107331	
28	Oil Search Ltd	Oil and gas	Yes*	HSBC CUSTODY NOMINEES (AUSTRALIA ) LIMITED	37%	legal person (LP)	Australia-AU	43 003 094 568	
			Yes*	J P MORGAN NOMINEES AUSTRALIA PTY LIMITED	28%	legal person (LP)	Australia-AU	75 002 899 961	
			Yes*	AUST EXECUTOR TRUSTEES LIMITED (IPIC )	15%	legal person (LP)	Australia-AU	F00127950	
			Yes*	CITICORP NOMINEES PTY LIMITED	8%	legal person (LP)	Australia-AU	37 000 809 030	
			Yes*	NATIONAL NOMINESS LIMITED	3%	legal person (LP)			
			Yes*	BNP PARIBAS NOMINEES PTY LTD (AGENCY LENDING DRP A/C)	3%	legal person (LP)	Australia-AU	54 084 150 023	
			Yes*	BNP PARIBAS NOMS PTY LTD (DRP)	2%	legal person (LP)			
			Yes*	AUSTRALIAN FOUNDATION INVESTMENT COMPANY LIMITED	1%	legal person (LP)	Australia-AU	56 004 147 120	
			Yes*	CITICORP NOMINEES PTY LIMITED (COLONIAL FIRST STATE INV A/C)	1%	legal person (LP)	Australia-AU	37 000 809 030	
			Yes*	HSBC CUSTODY NOMINEES (AUSTRALIA) LIMITED (NT-COMNWLTH SUPER CORP A/C)	1%	legal person (LP)	Australia-AU	43 003 094 568	
			Yes*	BNP PARIBAS NOMINEES PTY LTD (AGENCY LENDING COLLATERAL)	1%	legal person (LP)	Australia-AU	54 084 150 023	
30	Niuminco Edie Creek Ltd	Mining	Yes*	NIUMINCO LTD	100%	legal person (LP)			
31	Simberi Gold Co. Ltd	Mining	Yes*	NORD PACIFIC LIMITED	100%	legal person (LP)			
32	Harmony PNG 20 Limited	Mining	Yes*	HARMONY GOLD (PNG SERVICES) PTY LTD	100%	legal person (LP)			
33	Morobe Exploration Limited	Mining	Yes*	HARMONY GOLD (PNG SERVICES) PTY LIMITED	100%	legal person (LP)			
34	Newcrest PNG 3 Limited	Mining	Yes*	NEWCREST INTERNATIONAL PTY LIMITED	100%	legal person (LP)			
35	Newcrest PNG Exploration Limited	Mining	Yes*	NEWCREST INTERNATIONAL PTY LIMITED	100%	legal person (LP)			
36	Niuminco (ND) Limited	Mining	Yes*	NIUMINCO GROUP LIMITED	100%	legal person (LP)	PNG	3-88205	
37	Upper Ok Tedi Resources Company Limited	Mining	Yes*	Caleb KONMOP	100%				
38	Ok Tedi Foundation	SOE	Yes*						
39	Frieda River Ltd	Mining	Yes*	PANAUST SPVI PTE. LTD	100%	legal person (LP)			
40	Horizon Oil (Papua) Ltd	Oil and gas	No						
41	K92 Mining Ltd	Mining	Yes*	K92 HOLDINGS INTERNATIONAL LIMITED	100%	legal person (LP)			
42	MCC Ramu NiCo Ltd	Mining	Yes*	MCC-JJJ MINING DEVELOPMENT COMPANY LIMITED	100%	legal person (LP)			
43	Mineral Resources Enga Limited	Mining	Yes*	ENGA PROVINCIAL GOVERNMENT	50%	State entity			

No.	Company	Sector	Source	Full name of direct shareholder(s)	% interest	Shareholder Is	Country or nationality	Unique ID number	Publicly listed
			Yes*	KUPIANE YUU ANDUANE COMPANY LIMITED	50%	legal person (LP)	PNG	1-15135	
44	Nautilus Minerals Niugini 3 Limited	Mining	Yes*	DSMF I LTD	100%	legal person (LP)			
45	Nautilus Minerals Niugini Limited	Mining	Yes*	DSMF I LTD	100%				
47	Larus Energy (PNG) Ltd	Oil and gas	Yes*	LARUS ENERGY LIMITED	100%		AUSTRALIA		
48	MKS Ltd	Oil and gas	Yes*	SOUTHERN INTERNATIONAL CO LTD	5%	legal person (LP)	Japan		
			Yes*	FUTURE TRILLION HOLDINGS LIMITED	82%	legal person (LP)	Virgin Islands		
			Yes*	RICHLAND RESOURCES LIMITED	6%	legal person (LP)	Virgin Islands		
			Yes*	AVONHERST LIMITED	7%	legal person (LP)	Virgin Islands		
4		Oil and gas	Yes*	Alastair Rowland BROWN	0,90%	Natural person (NP)	AUSTRALIA		
	Kina Petroleum Ltd		Yes*	William James &. Carole Patricia EDWARDS	0,22%	Natural person (NP)	AUSTRALIA		
			Yes*	Peter Nam NGUYEN	0,09%	Natural person (NP)	AUSTRALIA		
			Yes*	Lindall Jane NUTT	0,09%	Natural person (NP)	AUSTRALIA		
			Yes*	Anthony CLARK	0,16%	Natural person (NP)	AUSTRALIA		
			Yes*	Joseph CARISTO	0,22%	Natural person (NP)	AUSTRALIA		
			Yes*	Harold CLOUGH	0,09%	Natural person (NP)	AUSTRALIA		
			Yes*	Claudette KHAZEN	0,09%	Natural person (NP)	AUSTRALIA		
			Yes*	Marcelo Bernardi DE ANDRADE	0,04%	Natural person (NP)	AUSTRALIA		
			Yes*	Derek Raymond &. Desiree Melodie LEE	0,13%	Natural person (NP)	AUSTRALIA		
			Yes*	Michelle Louise SICILIANO	0,24%	Natural person (NP)	AUSTRALIA		
			Yes*	Darrell Patrick SEETO	0,24%	Natural person (NP)	AUSTRALIA		
			Yes*	ASSOCIATED PROJECT MANAGEMENT PTY LTD	1%	legal person (LP)			
			Yes*	NEQUAM PTY LTD	0%	legal person (LP)			
			Yes*	DAVKIRK PTY LTD	0%	legal person (LP)			
			Yes*	GEBA PTY LTD	1%	legal person (LP)			
			Yes*	PEGARI PTY LIMITED	0%	legal person (LP)			
			Yes*	DB MANAGEMENT PTY LTD	3%	legal person (LP)			
			Yes*	REDOPTS PTY LTD	1%	legal person (LP)			
			Yes*	LUAGA PTY LTD	7%	legal person (LP)			
			Yes*	PACIFIC NOMINEES LIMITED	0%	legal person (LP)	PNG	1-57953	
			Yes*	PEWOVE PTY LTD	9%	legal person (LP)			
			Yes*	BOWERBIRD CONSOLIDATED PTY LTD	6%	legal person (LP)			

No.	Company	Sector	Source	Full name of direct shareholder(s)	% interest	Shareholder Is	Country or nationality	Unique ID number	Publicly listed
			Yes*	JSC INVESTMENT LIMITED	13%	legal person (LP)	PNG	1-70435	
			Yes*	PROFESSIONAL NOMINEES PTY LTD	21%	legal person (LP)			
			Yes*	J & R SCHRODER SUPER FUND	9%	legal person (LP)			
			Yes*	AGENTS & NOMINEES PTY LTD	5%	legal person (LP)			
			Yes*	KUMUL ENERGY RESOURCES LIMITED	4%	legal person (LP)	PNG	1-73901	
			Yes*	Barry James TAN	15,69%	Natural person (NP)	PNG		
51	Hillsborough Ltd	Oil and gas	Yes*	RIMBUNAN PETROGAS LIMITED	90%	legal person (LP)	Virgin Islands		
			Yes*	DOUBLEROCK LIMITED	10%	legal person (LP)	PNG	1-62275	
52	Sandaun Petroleum Energy Development Ltd	Oil and gas	Yes*	Carl NANGI	12,50%	Natural person (NP)	PNG		
			Yes*	Ambrose UNNA	12,50%	Natural person (NP)	PNG		
			Yes*	Gabriel Job AREMAN	12,50%	Natural person (NP)	PNG		
			Yes*	Jacob AREMAN	12,50%	Natural person (NP)	PNG		
			Yes*	Paschal SAIRERE	12,50%	Natural person (NP)	PNG		
			Yes*	Florian SARWAP	12,50%	Natural person (NP)	PNG		
			Yes*	Leo PENI	12,50%	Natural person (NP)	PNG		
			Yes*	Kevin KASAP	12,50%	Natural person (NP)	PNG		
53	Begesin Petroleum Ltd	Oil and gas	Yes*	George NARAUP	12,50%	Natural person (NP)	PNG		
			Yes*	John MAUNI	12,50%	Natural person (NP)	PNG		
			Yes*	Eki EGURUPA	12,50%	Natural person (NP)	PNG		
			Yes*	Abraham UMM	12,50%	Natural person (NP)	PNG		
			Yes*	Bill SUAIP	12,50%	Natural person (NP)	PNG		
			Yes*	Yamaip SISIRIP	12,50%	Natural person (NP)	PNG		
			Yes*	Puni MURI	12,50%	Natural person (NP)	PNG		
			Yes*	Irisa BARR	12,50%	Natural person (NP)	PNG		
55	Kapul Petroleum Ltd	Oil and gas	Yes*	Petrus THOMAS	100,00%	Natural person (NP)	PNG		

No.	Company	Sector	Source	Full name of direct shareholder(s)	% interest	Shareholder Is	Country or nationality	Unique ID number	Publicly listed
56	Dondonald Ltd	Oil and gas	Yes*	RAWSON RESOURCES LIMITED	93%	legal person (LP)	AUSTRALIA		
			Yes*	LAKES OIL NL	7%	legal person (LP)	AUSTRALIA		
57	Ramu Nickel Ltd	Mining	Yes*	HIGHLANDS PACIFIC LIMITED	100,00%	Natural person (NP)	PNG	1-26892	
58	Tolukuma Gold Mine Ltd	Mining	Yes*	ASIDOKONA MINING RESOURCES PTE. LTD.	100%	legal person (LP)	PNG	3-109020	
59	Woodlark Mining Ltd	Mining	Yes*	GEOPACIFIC RESOURCES LIMITED	100%	legal person (LP)	AUSTRALIA		
60	Abundance Valley (PNG) Limited	Mining	Yes*	GOLD MOUNTAIN LIMITED	100%	legal person (LP)	AUSTRALIA		
61	Aiabba Minerals (PNG) Limited	Mining	Yes*	Moses MONDOWA	100,00%	Natural person (NP)	PNG		
62	Alexander Mining Limited	Mining	Yes*	James DAS	40,00%	Natural person (NP)	PNG		
			Yes*	Raymond DAS	30,00%	Natural person (NP)	CANADA		
			Yes*	Desmond DAS	30,00%	Natural person (NP)	CANADA		
63	Anglo American Exploration (PNG) Limited	Mining	Yes*	ANGLO AMERICAN INTERNATIONAL HOLDINGS LIMITED	100%	legal person (LP)	United Kingdom		
64	APAC Mining (PNG) Limited	Mining	Yes*	APAC MINING PTY LTD	100%	legal person (LP)	AUSTRALIA		
65	Apollo Mineral Resources Limited	Mining	Yes*	Eng Cheng LEE	100,00%	Natural person (NP)	PNG		
67	Ballygowan Limited	Mining	Yes*	James Sinton SPENCE	32,67%	Natural person (NP)	New Zealand		
			Yes*	Duncan John HARDIE	32,67%	Natural person (NP)	PNG		
			Yes*	Anthony WILLIAMSON	32,67%	Natural person (NP)	AUSTRALIA		
			Yes*	ARC GOLD HOLDINGS PTY LTD	2%	legal person (LP)	AUSTRALIA		
			Yes*	Mawun BALOB	50,00%	Natural person (NP)	PNG		
68	Bayawaha Limestone Company Limited	Mining	Yes*	Guzerries YAKAM BOM	50,00%	Natural person (NP)	PNG		
			Yes*	Mawun BALOB	50,00%	Natural person (NP)	PNG		
69	Biangai Development Corporation	Mining	Yes*	Tom YABI	14,29%	Natural person (NP)	PNG		
			Yes*	Yapi SIWING	14,29%	Natural person (NP)	PNG		
			Yes*	Ngawae MITIO	14,29%	Natural person (NP)	PNG		
			Yes*	Yapu SOGOWA	14,29%	Natural person (NP)	PNG		
			Yes*	Danny WELE	14,29%	Natural person (NP)	PNG		
			Yes*	Wali KAWA	14,29%	Natural person (NP)	PNG		



No.	Company	Sector	Source	Full name of direct shareholder(s)	% interest	Shareholder Is	Country or nationality	Unique ID number	Publicly listed
			Yes*	Ransen KAWIA	14,29%	Natural person (NP)	PNG		
70	Bismarck Mining Corporation (PNG) Limited	Mining	Yes*	ODYSSEY MARINE EXPLORATION, INC.	80%	legal person (LP)	United States		
			Yes*	NEPTUNE MINERALS, INC	20%	legal person (LP)	United States		
72	Bulolo Alluvials Limited	Mining	Yes*	Collin BAYLISS	33,33%	Natural person (NP)	AUSTRALIA		
			Yes*	Mary June BAYLISS	33,33%	Natural person (NP)	AUSTRALIA		
			Yes*	ZERO MINING COMPANY	33%	legal person (LP)	PNG		
73	Bungamba (Sankwep) Investments Limited	Mining	Yes*	Bogena SAING	80,00%	Natural person (NP)	PNG		
			Yes*	Moses TAGIWING	10,00%	Natural person (NP)	PNG		
			Yes*	Masam SOM	10,00%	Natural person (NP)	PNG		
74	Canterbury Resources (PNG) Limited	Mining	Yes*	CANTERBURY RESOURCES LIMITED	100%	legal person (LP)	AUSTRALIA		
75	Cheroh Mining PNG Limited	Mining	Yes*	Laurel Francisco TIU JR	25%	legal person (LP)	Philippines		
			Yes*	STRATEGIC VENTURE PTE. LTD	75%	legal person (LP)	Singapore		
76	Combuco Limited	Mining	Yes*	Ole RAWALO	100,00%	Natural person (NP)	PNG		
77	Copper Quest PNG Limited	Mining	Yes*	COPPERMOLY LIMITED ACN	100%	legal person (LP)	AUSTRALIA		
78	Coral Sea Venture Limited	Mining	Yes*	Ian GRAY	100,00%	Natural person (NP)	AUSTRALIA		
80	Croke Limited	Mining	Yes*	David John MORRISON	25,00%	Natural person (NP)	AUSTRALIA		
			Yes*	James Sinton SPENCE	25,00%	Natural person (NP)	PNG		
			Yes*	Duncan John HARDIE	25,00%	Natural person (NP)	New Zealand		
			Yes*	Anthony WILLIAMSON	25,00%	Natural person (NP)	AUSTRALIA		
81	Dae Han Resources Development Limited	Mining	Yes*	Kumsun KIM	20,00%	Natural person (NP)	Korea, Republic Of		
			Yes*	Tae Seon PARK	30,00%	Natural person (NP)	Korea, Republic Of		
			Yes*	Yeon Soo LEE	50,00%	Natural person (NP)	Korea, Republic Of		
82	Dansar Mining 1 Limited	Mining	Yes*	Tony David BLAIR	100,00%	Natural person (NP)	AUSTRALIA		
83	Eda Kopa (Solwara) Limited	Mining	Yes*	KUMUL MINERALS HOLDINGS LIMITED	100%	legal person (LP)	PNG	1-59327	
84	Edie Alluvial Limited	Mining	Yes*	John Kensa GAWI	49,00%	Natural person (NP)	PNG		
			Yes*	John Ronald SEDDON	1,00%	Natural person (NP)	PNG		

No.	Company	Sector	Source	Full name of direct shareholder(s)	% interest	Shareholder Is	Country or nationality	Unique ID number	Publicly listed
			Yes*	MELANESIAN RESOURCES LIMITED	50%	legal person (LP)	PNG	1-14265	
85	EL Dorado Mining and Energy Limited	Mining	Yes*	GRYPHON MINING & ENERGY MELANESIA PTY LTD	100%	legal person (LP)	AUSTRALIA		
86	Finny Limited	Mining	Yes*	CANTERBURY RESOURCES LIMITED	100%	legal person (LP)	AUSTRALIA		
89	Gallipoli Exploration (PNG) Limited	Mining	Yes*	WCB PACIFIC PTY LIMITED	81%	legal person (LP)	AUSTRALIA		
			Yes*	PAN PACIFIC COPPER CO LTD	19%	legal person (LP)	Japan		
90	Gama Projex Limited	Mining	Yes*	PACIFIC HELICOPTERS LTD.	35%	legal person (LP)	PNG	1-6992	
			Yes*	MEDCONS LIMITED	20%	legal person (LP)	PNG	1-48219	
			Yes*	LEC (LANDS & EXPLORATION COMPANY) LTD	20%	legal person (LP)	PNG	1-71499	
			Yes*	GAMA PROJEX PTE LTD	25%	legal person (LP)	Malaysia		
91	GMN 6768 (PNG) Limited	Mining	Yes*	GOLD MOUNTAIN LIMITED	100%	legal person (LP)	AUSTRALIA		
92	Golden Valley Enterprise Limited	Mining	Yes*	PARKER HOLDINGS LIMITED	100%	legal person (LP)	PNG	1-86019	
94	Hardrock Limited	Mining	Yes*	Anthony WILLIAMSON	25,00%	Natural person (NP)	AUSTRALIA		
			Yes*	Duncan John HARDIE	25,00%	Natural person (NP)	New Zealand		
			Yes*	David John MORRISON	25,00%	Natural person (NP)	AUSTRALIA		
			Yes*	James Sinton SPENCE	25,00%	Natural person (NP)	PNG		
95	Hells Gate Exploration Limited	Mining	Yes*	Timothy James WARD	100,00%	Natural person (NP)	PNG		
96	Highlands Pacific Resources Limited	Mining	Yes*	QUIDUM RESOURCES INC.	100%	legal person (LP)	CANADA		
97	Kallow Limited	Mining	Yes*	Francis WAINA	50,00%	Natural person (NP)	PNG		
			Yes*	Winnie WAINA	50,00%	Natural person (NP)	PNG		
98	Kawari Wiem Limited	Mining	Yes*	Rizal MAHJUDDIN	80,00%	Natural person (NP)	AUSTRALIA		
			Yes*	WIEM HOLDINGS LIMITED	10%	legal person (LP)	PNG	1-83033	
			Yes*	KAWARI LIMITED	10%	legal person (LP)	PNG	1-24025	
99	Khor ENG Hock & Sons (PNG) Limited	Mining	Yes*	Hin Hong KHOR	61,74%	Natural person (NP)	Malaysia		
			Yes*	Boon Hong KHOR	35,00%	Natural person (NP)	Malaysia		
			Yes*	Quo Shun Vance KOH	3,24%	Natural person (NP)	Malaysia		
			Yes*	Issac WARTOVO	0,02%	Natural person (NP)	PNG		
100	Komomoa Energy Resources PNG Limited	Mining	Yes*	Philip KENDE	0,05%	Natural person (NP)	PNG		
			Yes*	James JOSIAH	0,08%	Natural person (NP)	PNG		
			Yes*	B.E. RESOURCE HOLDINGS PTY LTD	99,874%	legal person (LP)	AUSTRALIA		
101	Kuh Chun Limited	Mining	Yes*	Jim KAS	50,00%	Natural person (NP)	PNG		

No.	Company	Sector	Source	Full name of direct shareholder(s)	% interest	Shareholder Is	Country or nationality	Unique ID number	Publicly listed
102	Kupuyapa Mining Limited	Mining	Yes*	Frank AISAP	50,00%	Natural person (NP)	PNG		
			Yes*	Koiti MEL	50,00%	Natural person (NP)	PNG		
			Yes*	David Raim RAKADUI	50,00%	Natural person (NP)	PNG		
104	Mayur Exploration PNG Limited	Mining	Yes*	MR EXPLORATION PNG PTE. LTD	100%	legal person (LP)	SINGAPORE		
105	Mayur Industrials PNG Limited	Mining	Yes*	MR PNG DRI & STEEL MAKING PTE LTD	100%	legal person (LP)	SINGAPORE		
106	Mayur Iron PNG Limited	Mining	Yes*	MR IRON PNG PTE LTD	100%	legal person (LP)	SINGAPORE		
108	Mineral Resources Madang Limited	Mining	Yes*	MINERAL RESOURCES DEVELOPMENT COMPANY LIMITED	100%	legal person (LP)	PNG	1-53439	
109	Mineral Resources Ramu Limited	Mining	Yes*	MINERAL RESOURCES DEVELOPMENT COMPANY LIMITED	100%	legal person (LP)	PNG	1-5231	
110	Mineral Resources Star Mountain Limited	Mining	Yes*	MINERAL RESOURCES DEVELOPMENT COMPANY LIMITED	100%	legal person (LP)	PNG	1-5231	
111	Mobile Works Limited	Mining	Yes*	David Raim RAKADUI	100,00%	Natural person (NP)	PNG		
112	Munga River Limited	Mining	Yes*	Koiti MEL	32,00%	Natural person (NP)	PNG		
			Yes*	Grace RAIM	3,00%	Natural person (NP)	PNG		
			Yes*	MOBILE WORKS LTD	60%	legal person (LP)	PNG	1-63916	
			Yes*	MANGKUM LIMITED	5%	legal person (LP)	PNG	1-29852	
113	New Dawn Mining (PNG) Limited	Mining	Yes*	Komai KAWI	5,00%	Natural person (NP)	PNG		
			Yes*	RASHIN LIMITED	40%	legal person (LP)	PNG	1-89619	
			Yes*	ONYX INVESTMENT LIMITED	25%	legal person (LP)	PNG	1-118539	
			Yes*	JINGHARNS INTERNATIONAL LIMITED	30%	legal person (LP)	PNG	1-120402	
114	Nickelex PNG Limited	Mining	Yes*	Koiti MEL	33,33%	Natural person (NP)	PNG		
			Yes*	Timothy BARRY	33,33%	Natural person (NP)	New Zealand		
			Yes*	Trevor WRIGHT	33,33%	Natural person (NP)	New Zealand		
116	Nord Australex Nominees (PNG) Limited	Mining	Yes*	NORD PACIFIC LIMITED	100%	legal person (LP)	CANADA		
117	Oro Nickel Limited	Mining	Yes*	ORO NICKEL (VANUATU) LIMITED	100%	legal person (LP)	Vanuatu		
118	Pacific Arc Aurum (Niugini) Limited	Mining	Yes*	James Sinton SPENCE	33,30%	Natural person (NP)	PNG		
			Yes*	Duncan John HARDIE	33,33%	Natural person (NP)	New Zealand		
			Yes*	Anthony WILLIAMSON	33,33%	Natural person (NP)	AUSTRALIA		
			Yes*	AUSTRALIS GOLD RESOURCES PTY LTD	0,020%	legal person (LP)	AUSTRALIA		
			Yes*	ARC GOLD HOLDINGS PTY LTD	0,02%	legal person (LP)	AUSTRALIA		

No.	Company	Sector	Source	Full name of direct shareholder(s)	% interest	Shareholder Is	Country or nationality	Unique ID number	Publicly listed
			Yes*	Gidisa RIKANI	75,00%	Natural person (NP)	PNG		
			Yes*	Susu SALOS	20,00%	Natural person (NP)	PNG		
			Yes*	Ortzoba SESERO	20,00%	Natural person (NP)	PNG		
			Yes*	Jessey SESIGUO	20,00%	Natural person (NP)	PNG		
			Yes*	Seseru PAKIABI	20,00%	Natural person (NP)	PNG		
			Yes*	Samuel IFAME	16,67%	Natural person (NP)	PNG		
			Yes*	Noel KONNY	16,67%	Natural person (NP)	PNG		
			Yes*	Kelep WAIA	16,67%	Natural person (NP)	PNG		
			Yes*	Nahum HEMAN	16,67%	Natural person (NP)	PNG		
			Yes*	Andrew WAIA	16,67%	Natural person (NP)	PNG		
			Yes*	Siew Hong KOH	16,40%	Natural person (NP)	AUSTRALIA		
			Yes*	Hin Hong KOH	15,60%	Natural person (NP)	Malaysia		
			Yes*	GOLD MOUNTAIN LTD	20%	legal person (LP)	PNG	1-66827	
			Yes*	PARKER HOLDINGS LIMITED	51%	legal person (LP)	PNG	1-86019	
			Yes*	Raymond DAS	40,00%	Natural person (NP)	Canada		
			Yes*	Desmond DAS	40,00%	Natural person (NP)	Canada		
119	Pacific Energy Consulting Limited	Mining	Yes*	ASIA PACIFIC ENERGY VENTURES PTE LTD	100%	legal person (LP)	Singapore	201425452 Z	
120	Pacific Niugini Minerals (PNG) Limited	Mining	Yes*	PACIFIC NIUGINI MINERALS LTD	100%	legal person (LP)	AUSTRALIA	127 825 665	
121	Papuan Minerals Limited	Mining	Yes*	PAPUAN MINERALS PTY LIMITED (FORMERLY, GHM RESOURCES PTY LIMITED)	100%	legal person (LP)	AUSTRALIA	156 225 919	
122	PNG Forest Products Limited	Mining	Yes*	IB HOLDINGS PTE LIMITED	100%	legal person (LP)	PNG		
123	Property New Group Limited	Mining	Yes*	PACIFIC NOVEL ENTERPRISE LTD	100%	legal person (LP)	Hong Kong	2763998	
126	Rik Holdings Limited	Mining	Yes*	Doris RIKANI	25,00%	Natural person (NP)	PNG		
127	Rio Tinto Exploration (PNG) Limited	Mining	Yes*	RIO TINTO LIMITED	100%	legal person (LP)	AUSTRALIA		
128	Ruino Brothers Limited	Mining	Yes*	Upuru SOGIMO	20,00%	Natural person (NP)	PNG		
129	Solway Group Mining (PNG) Limited	Mining	Yes*	AQUILA MINE PTE LTD	100%	legal person (LP)	PNG		
130	Sudest Island Mining Limited	Mining	Yes*	AMD RESOURCES LIMITED	100%	legal person (LP)	PNG	3-109890	

No.	Company	Sector	Source	Full name of direct shareholder(s)	% interest	Shareholder Is	Country or nationality	Unique ID number	Publicly listed
131	Sumwari Sino PNG Gold Resources Development Co Limited	Mining	Yes*	Peter AWO	16,67%	Natural person (NP)	PNG		
133	Viva Gold (PNG) Limited	Mining	Yes*	GOLD MOUNTAIN LIMITED	100%	legal person (LP)	AUSTRALIA	115 845 942	
134	Viva No. 20 Limited	Mining	Yes*	KHOR ENG HOCK & SONS (PNG) LIMITED	48%	legal person (LP)	PNG	1-12622	
135	Wabu Alluvials Limited	Mining	Yes*	Russell Mark PAYNE	49,00%	Natural person (NP)	AUSTRALIA		
136	Waterford Limited	Mining	Yes*	MR ENERGY PNG PTE LTD	100%	legal person (LP)	Singapore		
137	West Coast Mining Limited	Mining	Yes*	James DAS	20,00%	Natural person (NP)	Canada		
138	WNB Resources Limited	Mining	Yes*	METAL MINING PNG LTD	100%	legal person (LP)	AUSTRALIA	628 862 886	
139	Yandera Mining Company Limited	Mining	Yes*	MARENCO MINING (AUSTRALIA) PTY LTD	100%	legal person (LP)	AUSTRALIA	099 496 474	
140	Zhong Rui Kuang Ye (PNG) Co. Limited	Mining	Yes*	ZHONG RUI (PNG) INVESTMENT HOLDINGS CO. LIMITED	100%	legal person (LP)	PNG	1-119161	

Table 4: Companies owned by publicly listed entities

No.	Companies	Source	Full legal name of listed entity	Stock exchange name	Link to stock exchange documents
1	Total E&P PNG Ltd	YES	TOTAL SE	Euronext	<a href="https://www.sec.gov/edgar/search/?r=el#/q=beneficial%2520ownership&amp;dateRange=1y&amp;category=form-cat0&amp;ciks=0000879764&amp;entityName=TOTAL%2520SE%2520(TOT)%2520(CIK%25200000879764)&amp;filter_ciks=0000879764&amp;filter_entityName=TOTAL%2520S.A.%2520%2520(TOT)%2520%2520(CIK%25200000879764)&amp;filter_location=I0">https://www.sec.gov/edgar/search/?r=el#/q=beneficial%2520ownership&amp;dateRange=1y&amp;category=form-cat0&amp;ciks=0000879764&amp;entityName=TOTAL%2520SE%2520(TOT)%2520(CIK%25200000879764)&amp;filter_ciks=0000879764&amp;filter_entityName=TOTAL%2520S.A.%2520%2520(TOT)%2520%2520(CIK%25200000879764)&amp;filter_location=I0</a>
2	Gini Energy Ltd	Yes*	CNOOC LTD (CEO)	New York Stock Exchange	<a href="https://www.sec.gov/edgar/search/#/q=beneficial%2520ownership&amp;dateRange=1y&amp;ciks=0001095595&amp;entityName=CNOOC%2520LTD%2520(CEO)%2520(CIK%25200001095595)">https://www.sec.gov/edgar/search/#/q=beneficial%2520ownership&amp;dateRange=1y&amp;ciks=0001095595&amp;entityName=CNOOC%2520LTD%2520(CEO)%2520(CIK%25200001095595)</a>
3	Newcrest PNG 2 Limited	YES	Newcrest Mining Limited	Toronto Stock Exchange	<a href="https://www.sedar.com/DisplayCompanyDocuments.do?lang=EN&amp;issuerNo=00032889">https://www.sedar.com/DisplayCompanyDocuments.do?lang=EN&amp;issuerNo=00032889</a>
4	Lihir Gold Ltd	YES	Newcrest Mining Limited	Toronto Stock Exchange	<a href="https://www.sedar.com/DisplayCompanyDocuments.do?lang=EN&amp;issuerNo=00032889">https://www.sedar.com/DisplayCompanyDocuments.do?lang=EN&amp;issuerNo=00032889</a>
5	Anomaly Ltd	YES	Crater Gold Mining Limited	Australian Securities Exchange	<a href="https://www2.asx.com.au/markets/trade-our-cash-market/announcements">https://www2.asx.com.au/markets/trade-our-cash-market/announcements</a>
6	ExxonMobil PNG Ltd	YES	Exxon Mobil Corporation	New York Stock Exchange	<a href="https://www.sec.gov/Archives/edgar/data/0000102909/000110465920018249/tv01546-exxonmobilcorp.htm">https://www.sec.gov/Archives/edgar/data/0000102909/000110465920018249/tv01546-exxonmobilcorp.htm</a>
7	Ampolex (PNG) Ltd	YES	Exxon Mobil Corporation	New York Stock Exchange	<a href="https://www.sec.gov/Archives/edgar/data/0000102909/000110465920018249/tv01546-exxonmobilcorp.htm">https://www.sec.gov/Archives/edgar/data/0000102909/000110465920018249/tv01546-exxonmobilcorp.htm</a>
8	Ampolex Highlands Ltd	YES	Exxon Mobil Corporation	New York Stock Exchange	<a href="https://www.sec.gov/Archives/edgar/data/0000102909/000110465920018249/tv01546-exxonmobilcorp.htm">https://www.sec.gov/Archives/edgar/data/0000102909/000110465920018249/tv01546-exxonmobilcorp.htm</a>
9	Ampolex (PNG Petroleum) INC	YES	Exxon Mobil Corporation	New York Stock Exchange	<a href="https://www.sec.gov/Archives/edgar/data/0000102909/000110465920018249/tv01546-exxonmobilcorp.htm">https://www.sec.gov/Archives/edgar/data/0000102909/000110465920018249/tv01546-exxonmobilcorp.htm</a>
10	Esso Highlands Ltd	YES	Exxon Mobil Corporation	New York Stock Exchange	<a href="https://www.sec.gov/Archives/edgar/data/0000102909/000110465920018249/tv01546-exxonmobilcorp.htm">https://www.sec.gov/Archives/edgar/data/0000102909/000110465920018249/tv01546-exxonmobilcorp.htm</a>
11	Esso PNG Juha Ltd	YES	Exxon Mobil Corporation	New York Stock Exchange	<a href="https://www.sec.gov/Archives/edgar/data/0000102909/000110465920018249/tv01546-exxonmobilcorp.htm">https://www.sec.gov/Archives/edgar/data/0000102909/000110465920018249/tv01546-exxonmobilcorp.htm</a>
12	Esso PNG Moran Ltd	YES	Exxon Mobil Corporation	New York Stock Exchange	<a href="https://www.sec.gov/Archives/edgar/data/0000102909/000110465920018249/tv01546-exxonmobilcorp.htm">https://www.sec.gov/Archives/edgar/data/0000102909/000110465920018249/tv01546-exxonmobilcorp.htm</a>
13	ExxonMobil PNG Antelope Limited	YES	Exxon Mobil Corporation	New York Stock Exchange	<a href="https://www.sec.gov/Archives/edgar/data/0000102909/000110465920018249/tv01546-exxonmobilcorp.htm">https://www.sec.gov/Archives/edgar/data/0000102909/000110465920018249/tv01546-exxonmobilcorp.htm</a>
14	Merlin Pacific Oil Co. NL	YES	Exxon Mobil Corporation	New York Stock Exchange	<a href="https://www.sec.gov/Archives/edgar/data/0000102909/000110465920018249/tv01546-exxonmobilcorp.htm">https://www.sec.gov/Archives/edgar/data/0000102909/000110465920018249/tv01546-exxonmobilcorp.htm</a>
15	SPI (210) Limited	YES	Exxon Mobil Corporation	New York Stock Exchange	<a href="https://www.sec.gov/Archives/edgar/data/0000102909/000110465920018249/tv01546-exxonmobilcorp.htm">https://www.sec.gov/Archives/edgar/data/0000102909/000110465920018249/tv01546-exxonmobilcorp.htm</a>
16	SPI (220) Limited	YES	Exxon Mobil Corporation	New York Stock Exchange	<a href="https://www.sec.gov/Archives/edgar/data/0000102909/000110465920018249/tv01546-exxonmobilcorp.htm">https://www.sec.gov/Archives/edgar/data/0000102909/000110465920018249/tv01546-exxonmobilcorp.htm</a>
17	Esso PNG P'nyang Limited	YES	Exxon Mobil Corporation	New York Stock Exchange	<a href="https://www.sec.gov/Archives/edgar/data/0000102909/000110465920018249/tv01546-exxonmobilcorp.htm">https://www.sec.gov/Archives/edgar/data/0000102909/000110465920018249/tv01546-exxonmobilcorp.htm</a>
18	Harmony Gold (PNG) Exploration Limited	Yes*	Harmony Gold Mining Company	JSE	<a href="https://www.sec.gov/edgar/search/?r=el#/q=beneficial%20owner&amp;page=1&amp;ciks=0001023514&amp;entityName=HARMONY%20GOLD%20MINING%20CO%20LTD%20%20(CIK%200001023514)">https://www.sec.gov/edgar/search/?r=el#/q=beneficial%20owner&amp;page=1&amp;ciks=0001023514&amp;entityName=HARMONY%20GOLD%20MINING%20CO%20LTD%20%20(CIK%200001023514)</a>
19	Morobe Consolidated Goldfields Ltd	Yes*	Harmony Gold Mining Company	JSE	<a href="https://www.sec.gov/edgar/search/?r=el#/q=beneficial%20owner&amp;page=1&amp;ciks=0001023514&amp;entityName=HARMONY%20GOLD%20MINING%20CO%20LTD%20%20(CIK%200001023514)">https://www.sec.gov/edgar/search/?r=el#/q=beneficial%20owner&amp;page=1&amp;ciks=0001023514&amp;entityName=HARMONY%20GOLD%20MINING%20CO%20LTD%20%20(CIK%200001023514)</a>

No.	Companies	Source	Full legal name of listed entity	Stock exchange name	Link to stock exchange documents
20	Wafi Mining	Yes*	Harmony Gold Mining Company	JSE	<a href="https://www.sec.gov/edgar/search/?r=el#/q=beneficial%20owner&amp;page=1&amp;ciks=0001023514&amp;entityName=HARMONY%20GOLD%20MINING%20CO%20LTD%20(CIK%200001023514)">https://www.sec.gov/edgar/search/?r=el#/q=beneficial%20owner&amp;page=1&amp;ciks=0001023514&amp;entityName=HARMONY%20GOLD%20MINING%20CO%20LTD%20(CIK%200001023514)</a>
22	Santos Hides Limited	YES	Santos Limited	Australian Securities Exchange	<a href="https://www2.asx.com.au/markets/trade-our-cash-market/announcements">https://www2.asx.com.au/markets/trade-our-cash-market/announcements</a>
23	Lavana Limited	YES	Santos Limited	Australian Securities Exchange	<a href="https://www2.asx.com.au/markets/trade-our-cash-market/announcements">https://www2.asx.com.au/markets/trade-our-cash-market/announcements</a>
24	Santos Pnyang Limited	YES	Santos Limited	Australian Securities Exchange	<a href="https://www2.asx.com.au/markets/trade-our-cash-market/announcements">https://www2.asx.com.au/markets/trade-our-cash-market/announcements</a>
25	Barracuda Limited	YES	Santos Limited	Australian Securities Exchange	<a href="https://www2.asx.com.au/markets/trade-our-cash-market/announcements">https://www2.asx.com.au/markets/trade-our-cash-market/announcements</a>

Table 5: BO data

Company	Name	Date of Birth	Nationality	Country of Residence	Residential Address	% Share	% Voting Rights	Intermediate Company	Country of Registration
Gini Energy Ltd	Patrick Mahon	30/03/1940	IRELAND	SWITZERLAND	CHEMIN de BAFFA 8, 1184 VINZEL	18%	-	Hereford Securities & Management S.A.	Belize
	Ng King Chung Calvin	09/02/1967	China	Hong Kong	Westwood, 6 Maize Path, Palm Springs, Yuen Long San Tin, NT	58%	-	SKY NIGHT LIMITED	British Virgin Islands
Anomaly Ltd*	SWS CHAN	-	-	-	-	99,6%	-	Crater Gold Mining Limited/Freefire Technology Ltd	-Australia

\* Sources : Annual report for shareholders : <https://www2.asx.com.au/markets/trade-our-cash-market/announcements>

Yes	: Information submitted by reporting entities
Yes*	: Information not submitted but collected From IPA website and other sources
NO	: Information not submitted

### 3.3. Ownership maps

The ownership maps of the reporting entities are shown in annex 3.



### 3.4. BO register structure

The pilot BO register was designed by using Excel. The register includes five (5) interconnected spreadsheets as follows:

**(i) Company data**

- Name of the company
- Sector
- Source of information
- Country of registration
- Unique identification number
- Registration authority
- Registered office address

**(ii) Legal ownership data**

- Name of the company
- Sector
- Name(s) of direct shareholder(s)
- Participation interest
- Country or nationality
- Unique identification number
- If the shareholder is a publicly listed entity, the stock exchange name, Legal Entity Identifier (LEI) and link to the stock exchange documents

**(iii) Publicly listed Company**

- Name of the company
- Sector
- Full legal name of listed entity
- Stock exchange name
- Legal Entity Identifier (LEI)
- Link to stock exchange documents (must include the link to BO disclosure)

**(iv) Declaration**

**(v) Company ownership map**

## 4. Implementation of a Beneficial Ownership Register in PNG

### 4.1. PNG Policy for the Introduction of a Mandatory BO Disclosure Regime

Beneficial ownership (BO) is not specifically contained in PNG's national priorities, however, there are development goals in the resource extractive industry that indirectly relate to BO (stakeholders). These development goals are integrated through the development strategies<sup>5</sup>.

The current PNG legislative regulations on the disclosure of BOs described in the scoping study are incomplete and do not entirely meet the conditions set forth in Requirement 2.5 of the EITI Standard. The subject matter regulations are generic (they apply to all legal entities) and stem exclusively from the legal regulations on combating money laundering and terrorism financing.

We understand that the PNGEITI-MSG had agreed that the PNG Investment Promotion Authority (PNGIPA)'s Registrar of Companies would be the appropriate government agency to maintain a BO register or a license register. We also understand that there is an on-going work for IPA, supported by the ADB technical assistance project for review of all legislations administered by the IPA as part of the government's legislative reforms to create a conducive environment for further investment.

Key elements of relevant PNG legislation and government declarations demonstrating commitment for BO transparency include:

- the "National Action Plan on Promotion of Open Governance in August 2018- August 2020";<sup>6</sup>
- the EITI-PNG Work plan (2019);<sup>7</sup>
- PNG Roadmap for BO disclosure;<sup>8</sup>
- Anti-Money Laundering and Counter Terrorist Financing Act 2015 (No. 20 of 2015);<sup>9</sup> and
- The National Policy for Transparency and Accountability in the Extractives Sector in Papua New Guinea;<sup>10</sup> and
- Principles and Prudential Requirements (Bank of PNG);<sup>11</sup>

all of which explicitly support transparency in the extractive industries and BO disclosure, whilst recognising that further work is needed to achieve this aim.

The focus of a generally accepted BO regime is likely to be driven by stakeholder's commitment and desire to:

- prevent corruption and illicit financial transactions;
- prevent conflict of interest due to the undue influence (e.g., licensing and/or contracting extractive industries);
- reduce reputational and other risks and comply with international treaty and other obligations;
- enhance revenue collection and combat tax evasion;
- increase trust and accountability in government; and
- improve the investment climate and public trust in business.

In summary, the collection and subsequent disclosure of BO information is increasingly accepted as good international practice meeting rising expectations of transparency and good governance from Civil Society as well as from multilateral institutions and initiatives and investors.

### 4.2. Mechanism for a BO Disclosure Regime in PNG

As stated above, PNG has an opportunity to implement a mandatory BO regime at a time when there is substantial institutional guidance and there are suitable examples of emerging international good practices.

In assessing international good practice, the scoping report draws on the experience of initiatives to implement BO disclosure in selected comparator countries and guidelines developed by selected international institutions and initiatives.

<sup>5</sup> Vision 2050, National Strategy for Responsible Sustainable Development for PNG, Medium Term Development Plan 2 (2016-17), Alotau Accord

<sup>6</sup> [https://www.opengovpartnership.org/wp-content/uploads/2018/11/Papua-New-Guinea\\_Action-Plan\\_2018-2020.pdf](https://www.opengovpartnership.org/wp-content/uploads/2018/11/Papua-New-Guinea_Action-Plan_2018-2020.pdf)

<sup>7</sup> <https://eiti.org/files/documents/png-eiti-2019-workplan-final.pdf>

<sup>8</sup> [https://eiti.org/files/documents/png\\_eiti\\_beneficial\\_ownership\\_roadmap.pdf](https://eiti.org/files/documents/png_eiti_beneficial_ownership_roadmap.pdf)

<sup>9</sup> <http://www.parliament.gov.pg/index.php/bills-and-legislation/view/anti-money-laundering-and-counter-terrorist-financing-act-2015>

<sup>10</sup> [https://eiti.org/files/documents/png\\_eiti\\_national\\_policy\\_final\\_2019\\_1.pdf](https://eiti.org/files/documents/png_eiti_national_policy_final_2019_1.pdf)

<sup>11</sup> <https://www.bankpng.gov.pg/financial-inclusion/principles-and-prudential-requirements/>

A common theme that emerges from the review of BO data collected through EITI-PNG and the comparator countries is:

- the difficulty in the collection and verification of BO information without a legal framework;
- international good practice in the mechanisms for implementing and administering a BO register is still evolving. There are few operating registers worldwide including in UK, which present an example of international good practice in many aspects of its BO register.
- efficient BO disclosure regime encompasses a clear definition set out in law, a public access to BO registers and a general application to all corporate entities regardless of the industry.

The elements required for the mechanisms to implement and administer a mandatory BO disclosure regime are:

- (i) the architecture of the BO register;
- (ii) the data collection framework;
- (iii) verification processes;
- (iv) publication mechanisms;
- (v) sanction system; and
- (vi) the legislative process.

#### 4.2.1. Architecture of the BO register

##### *(i) Good practice*

Countries implementing a BO register face the choice of adding the register to an existing platform, such as a legal entity register or establishing a separate registry system.

This depends first on the scope. The EITI requirements only cover companies participating in the “upstream” segment of the extractive sector (i.e., legal entities applying for or holding extractive licenses). This brings a relatively small number of companies in scope for reporting (as compared to an economy-wide register). A stand-alone approach in these circumstances may be more economical and require less infrastructure to implement, maintain and administer.

The other consideration when choosing between adding the register to an existing system or creating a stand-alone system is the level of sophistication of the company register already in place.

It is worth noting that countries that have implemented mandatory BO disclosure regimes, applying to significant numbers of companies or having their whole economy in scope, have opted to incorporate the BO requirements into an existing company register (UK, Zambia, Senegal, Ukraine, Indonesia and Mongolia).

The approach of a stand-alone may not be appropriate in the case of PNG, where the number of extractive companies exceeds a hundred and will likely be larger as PNG-MSG decides to include not just “upstream” but also “midstream” and “supply chain” activities.

Moreover, PNG has an existing, sophisticated legal entity register, the Registrar of Companies (ROC) under the Investment Promotion Authority (IPA)<sup>12</sup> available online and it is easier to add on the BO reporting system. PNG companies or overseas companies intending to carry on business in PNG must register with the ROC. Companies or branches which are foreign owned must also obtain formal certification from the IPA as a foreign entity carrying on business in PNG.

##### *(ii) Contents of a company registration at the Register of Companies*

The Investment Promotion Authority through the Register of Companies office maintains a national registry of all companies, associations, business groups and business names in Papua New Guinea. The company register is maintained in paper and electronic formats<sup>13</sup> and includes the following information on companies:

- ROC registered number
- Name of the company, Type, Legal Status & Historical Status
- Incorporation date
- Business activity
- Full Address - registered office address, postal address and address for service

<sup>12</sup> <https://www.ipa.gov.pg/>

<sup>13</sup> [https://www.ipa.gov.pg/pngmaster/viewInstance/view.html?id=a52871ec04449bd6717859e74e6643016f84b616edbdbc8d&\\_timestamp=635401770206442](https://www.ipa.gov.pg/pngmaster/viewInstance/view.html?id=a52871ec04449bd6717859e74e6643016f84b616edbdbc8d&_timestamp=635401770206442)

- Authorised/Issued/Paid Up Share Capital
- Principals/Directors/Secretaries
- Legal ownership, depending on whether the shareholder is:
  - a legal entity: name, legal address, appointment date and registration details
  - a natural person: name and surname, nationality or residence of each shareholder
- Number of shares held by each shareholder
- Annual Return - filing month and date AR last filed.

### **(iii) Filing deadlines and penalties**

Failure to comply with the legislations administered by the ROC may result in administrative penalties or prosecutions that may follow jail sentences or fines or both against the company directors and the company itself. The latter can only be fined or deregistered. The nature of penalty, whether administrative or others, and deregistration of a company depends on the severity of the offences.

The list of defaulting companies is also published on the IPA website (<https://www.ipa.gov.pg/defaulting-companies-list/>) in preparation for the deregistration exercise.

### **(iv) Access to the register**

The PNG register of company is accessible online. Any person (whether PNG or a foreign citizen) has the right of access to the relevant records by requesting an extract from the ROC or copies of the documents provided for registration.

This right currently include information on the shareholders of legal entities and on their share in the charter capital. The online access to key information about a legal entity is free. All information specified in paragraph (ii) above can be obtained online and free-of-charge.

## **4.2.2. Data collection framework**

### **(i) Good practice**

Countries have adopted a variety of approaches to data collection and disclosure mechanisms. Some EITI countries have established separate reporting systems or added it to their annual EITI reporting process. Choices about the data collection framework are determined by the scope of companies required. However, the trend is towards implementing BO disclosure onto existing company registers.

In the case of the latter option, other companies involved in the extractive sector, such as service providers and other suppliers, could be captured by default where the BO register extends across the whole economy.

Amongst comparator countries and organizations, there is a high degree of alignment on the basic information to be collected on each BO.

Table 1 below contains a summary of the disclosure details in the comparator countries and organizations/initiatives.

**Table 1: Summary of Disclosure Details including PEPs**

	Name	Date of Birth	Address	Nationality	Nature/ level of ownership control	Effective date	ID Number	Occupation	PEPs
<b>Mongolia</b>	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes
<b>UK</b>	Yes	Yes	Yes	No	Yes	Yes	No	No	No
<b>Ukraine</b>	Yes	Yes	Yes	Yes	Yes	No	Yes	No	Yes
<b>Zambia</b>	Yes	Yes	Yes	Yes	Yes	No	No	No	No
<b>Indonesia</b>	Yes	Yes	Yes	Yes	Yes	No	Yes	No	No
<b>EITI</b>	Yes	Yes	Yes	Yes	Yes	No	Yes	No	Yes

	Name	Date of Birth	Address	Nationality	Nature/ level of ownership control	Effective date	ID Number	Occupation	PEPS
EU	Yes	Yes	Yes	Yes	Yes	No	No	No	Yes
FATF	Yes	No	No	No	Yes	No	No	No	Yes

### *(ii) Data to be collected*

See section 2.2.

### *(iii) Interoperability of BO register*

The initial purpose of PNG's BO register is to meet the commitment made as part of EITI implementation. However, it cannot be ignored that there is also a need to use a BO register to combat offshore profit shifting and avoidance through complex structures, intragroup and related party transactions, to enforce the conflict of interest provisions and support authorities' efforts to identify and address undisclosed conflicts of interest.

Therefore, the interoperability of the BO register should be considered in the data collection framework for the following benefits:

- Allowing the sharing of information between tax authorities and law enforcement agencies in an efficient manner. BO information may be shared either domestically between different government agencies, or internationally under agreements to share information (on an automatic or on a request basis). Clearly, there is a practical advantage if that information is provided in a consistent format. This is particularly important where information is being shared across language barriers;
- Helping the identification of potential red flags by comparing automatically and systematically information reported through a variety of domestic registers or national BO registers of other countries;
- Allowing more stakeholders accessing its data. Stakeholders are likely to be accessing data from other countries' registers and comparing publicly available BO information across multiple local and foreign sources.

International good practice in interoperability is still developing and reflects a very small number of fully operational BO registers. The Beneficial Ownership Data Standard (BODS)<sup>14</sup> is a technical framework for collecting and publishing BO information, and enabling the resulting data to be interoperable. The BODS developed Open Ownership<sup>15</sup> which is an organization driven by leading Civil Society Organisations and initially funded by the UK government's Department for International Development. Ukraine has signed up to adopt BODS, and Open Ownership are also working with the Kyrgyz Republic. It is a common data standard which provides a structured template for describing BO in a machine-readable format.

In designing the additional templates and data storage elements for the BO register, PNG may consider utilising the BODS. If practically feasible, BODS should be used as the basis for the technical solution. This would likely apply only to the data identified as being part of the BO register, rather than the whole Company Register, the architecture for which already exists.

### *(iv) BO declaration template*

An example of a suitable BO data collection template can be found in annex 1. This template captures all information required by the EITI Standard.

Although this template gives a good example of the key elements required in collecting data, a new template/structure would need to be designed specifically for PNG, taking into account the decisions made on the recommended definition and disclosure mechanisms for BO data, including any decisions about the use of the BO register.

<sup>14</sup> <http://standard.openownership.org/en/0.2.0/>

<sup>15</sup> <https://www.openownership.org>

### 4.2.3. Data Verification

#### (i) Good practise

Effective verification is essential for a BO register to be a reliable tool to enhance transparency and to combat corruption. A key challenge for any BO register is ensuring completeness and accuracy of initial data collected, as well as its integrity over time by ensuring that data is periodically updated. This is achieved through a robust verification process and periodic requests for updates from registered entities.

A number of the comparator countries experienced difficulty in persuading companies to report BO data, especially where there was no legal obligation.

Most of the existing operational BO regimes are based on a reporting system where the onus is on companies to record BO details and to maintain supporting documentation. None of the existing operational BO regimes has an effective verification process in place and so there is little experience on which to base international good practice. However, public access and sanctions for failure to report or reporting misleading information could be relevant to address accuracy of BO data.

#### (ii) Verification challenges

The verification challenge arises from various factors, including:

- Unfamiliarity with BO concept especially for smaller companies;
- Complex corporate structures especially where there are multiple layers of ownership involving several jurisdictions and different types of legal entities and/or legally binding arrangements;
- Multiple documentary sources of BO data; and
- Continuous verification since BO information is likely to change continuously over time.

#### (iii) Layers of data verification

As verification is a continuous process, there are different layers at which verification can take place:

Layers of data verification	Detail of verification activities
Data submission	<ul style="list-style-type: none"> <li>➤ Measures to ensure accurate data entry: foreign names, full name of the legal owners</li> </ul>
	<ul style="list-style-type: none"> <li>➤ Verifying the identity and submitting authority of the submitter including:               <ul style="list-style-type: none"> <li>• Confirmation of identity and right to make submissions;</li> <li>• confirmation that the person submitting BO details is both able and authorised to provide accurate and reliable information.</li> </ul> </li> </ul>
Oversight of BO register	<ul style="list-style-type: none"> <li>➤ Screening of information against other sources of information, such as PEP register or BO register of other countries</li> </ul>
	<ul style="list-style-type: none"> <li>➤ Providing annual confirmation of the BO data held</li> </ul>
	<ul style="list-style-type: none"> <li>➤ Obligation to notify changes: To ensure the integrity of the BO register at any point in time, qualifying legal entities should be obliged to report any changes to their BO information within a short time period. The IPA Register currently has a reporting deadline of 14 days of the date of change<sup>16</sup>.</li> </ul>
	<ul style="list-style-type: none"> <li>➤ Obligation to maintain a record This obligation is found in BO disclosure systems in several comparator countries. The obligation typically includes a requirement to make information available on request from law enforcement agencies.</li> </ul>
Enforcement	<ul style="list-style-type: none"> <li>- Enforcement of reporting obligations</li> <li>- Disclosure of defaulting companies list</li> <li>- Sending reminders to companies that miss submission deadlines</li> </ul>

<sup>16</sup> Section 32 of Investment Promotion Act 1992.

Layers of data verification	Detail of verification activities
	<ul style="list-style-type: none"> <li>- Investigation and prosecution for serious noncompliance</li> <li>- Create awareness amongst companies of the potential penalties for noncompliance</li> <li>- Linking the provision of BO information to other commercial processes, such as the granting/renewing of licenses, permits, loans and other approvals.</li> </ul> <p>➤ Identifying red flags</p> <p>The BO register’s administrator should develop institutional criteria and skills to help identify and investigate red flags. Criteria that could raise red flags may include:</p> <ul style="list-style-type: none"> <li>- appearance on sanctions lists</li> <li>- complex ownership structures</li> <li>- persistent delay or failure to provide accurate or complete data</li> <li>- clear discrepancies with other publicly available data</li> </ul> <p>➤ Spot checks</p> <p>The BO register’s administrator should develop a set of institutional criteria and skills to conduct spot checks (e.g., to help identify a representative sample of submissions for spot checks).</p> <p>Such checks are different from those for red flags as the information submitted may not at first glance contain any errors or unusual features.</p> <p>➤ Obligation to report unusual activity</p> <p>The BO legal framework may include professional obligation on specific categories of registry users (e.g., law and accounting firms, financial institutions and advisors, etc.) to report instances where the user becomes aware of any discrepancies in the information held in the BO register.</p>
Public scrutiny	<p>This layer is provided by CSOs, media, citizens and companies. It includes identifying discrepancies in the normal course of retrieving the publicly available information from the BO register for their own data analyses and investigations.</p>

#### 4.2.4. Publication mechanisms

##### (i) Good practise

The EITI Standard calls for a public register. International good practice appears to be moving in the direction of public access to BO registers. In all comparator countries considered, the BO register is publicly available with safeguards to protect privacy and avoid security threats.

The advantages of public access to BO information are improving the overall transparency of the business environment. In addition, as noted in the above section, public access forms a vital element in BO data verification. It allows for scrutiny by a wide range of interested stakeholders, as well as of any reporting of unusual aspects or information that appears to be incomplete or inaccurate.

##### (ii) Personal security constraint

The Constitution of the Republic PNG does not contain any specific provisions that would prevent BO disclosure in the extractive industries although it does set out basic principles that are relevant - such as Section 51 of the Constitution which provides freedom of information and clearly states that:

*“Every citizen other than a citizen who has dual citizenship has the right of reasonable access to official documents, subject only to the need for such secrecy as is reasonably justifiable in a democratic society in respect of... (c) trade secrets, and privileged or confidential commercial or financial information obtained from a person or body...(h) the maintenance of personal privacy and security of the person”*



The Constitution recognises the right of personal security, which is taken to include the right of personal data secrecy. This may be relevant if there was a requirement to disclose personal details such as residential address in circumstances where it might expose the individual to harm.

The protection of personal data challenge can be addressed through withholding specific data fields (e.g., a private individual's residential address) from public access. Such information should still be collected for verification purposes and use by relevant authorities such as law enforcement.

#### 4.2.5. Sanctions and penalties

##### *(i) Good practise*

Most of the existing or proposed mandatory BO disclosure regimes contain provisions for sanctions and penalties in the event of non-compliance with the regime. Non-compliance can also provide a red flag to law enforcement authorities and provoke further investigations.

##### *(ii) Options for compliance incentives*

Therefore, PNG may consider the extension of the existing penalty regime under the Investment Promotion Act. Legal entities and authorised officers that provide a statement, or gives information that is false or misleading in a material particular, is guilty of an offence and are subject to fines not exceeding K50,000.00. Legal entities that fail to file the necessary information or required supporting documents on time are subject to fines not exceeding K25,000.00 or to imprisonment for a term not exceeding two years, or to both such fine and imprisonment, and where the offence is a continuing one, is further liable to a default penalty of a fine not exceeding K2,500.00 for each day during which the offence is committed after conviction (Sec 43 and 41B of the IPA Act).

Similar fines may be considered for any failure to disclose BO information in a timely manner or in case of false statement. These fines will alert companies to the risks of potentially being subjected to an investigation.

In addition to these existing penalties that may apply in case of failure to comply with the mandatory BO disclosure regime, PNG may also consider introducing further penalty options such as:

- Disqualification from public procurement processes and termination of licenses and permits; and
- Invalidation of any Contract(s) already awarded.

#### 4.2.6. The legislative process.

##### *(i) Good practise*

To date, the voluntary approach has failed to bring about adequate levels of BO disclosure.

For countries with a legislative requirement to report on BO, it is then possible to have a penalty regime for failure to report or the reporting of incorrect information. Information collected under a legislative requirement to disclose BO can provide evidence to support action under other legislative powers such as anti-money laundering and anti-corruption initiatives.

In countries that have legislated mandatory BO disclosure regimes, the typical direction has been to amend existing laws rather than introduce a stand-alone law. An exception is Ukraine and Senegal, that has introduced a stand-alone law to implement BO disclosure. Both Zambia and the UK enacted amendments to existing company laws to introduce mandatory BO disclosure requirements. This approach usually includes adding mandatory BO disclosure requirements to existing systems.

##### *(ii) Options*

The use of the existing Companies Register would reflect the largely successful approach adopted by the UK, Zambia and Senegal.

The existing register includes a clear legislative basis, a clear legal obligation (and related penalty regime) to provide and update the required information, dedicated and experienced supervisory authorities, public access and the use of electronic tools. The main weakness is a limited ability to monitor and identify incorrect or concealed information at an early stage.

We recommend that the BO register should be maintained by the Registrar of Companies (ROC) office. On that basis, we further recommend that:

- the existing architecture and framework of the Companies Register is applied to the registration of BO data;
- The ROC should be responsible for maintenance of the BO data;
- the same processes and time limits for registration and updating of information apply as for corporate information;
- the existing penalty regime under the Investment Promotion Authority Act apply for failure to register the required BO details.
- the Investment Promotion Authority Act and the Companies Act should be amended to:
  - include the list of information and documents that must be registered for the requirements of the BO disclosure regime;
  - add all BO specific data and disclosure requirements into the existing registry; and
  - add BO related penalty provisions.
- the National Procurement Act 2018 add BO should be amended to include obligation and provisions on disqualification from public procurement proceedings in case of failure to disclose BO;
- the MRA Act 2018, Mining Act 1992 (MA), Oil and Gas Act 1998 (OGA) and Unconventional Hydrocarbons Act 2015 should be amended to add explicit references to BO legislation and BO disclosure obligation for licences/contact holders and applicants;
- BO information is made freely available to the public as per legal ownership information;
- the development of the BO register should consider enabling factors for future interoperability;
- specific BO template and guidelines are adopted and EITI list should be the minimum set of data to be collected for each beneficial owner; and
- a robust verification process is implemented as an integral part of the BO register implementation and administration.

#### 4.2.7. Key elements of Mechanisms of disclosure

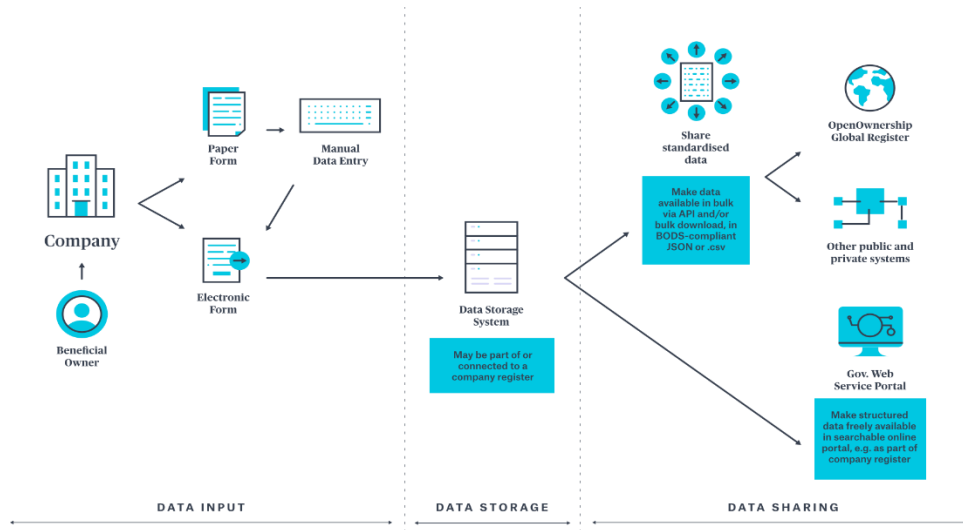
With regard to mechanisms for BO disclosure, international good practice encompasses:

- BO clearly defined in law including keyways in which ownership or control is exerted;
- BO disclosures should be collated and held within a central register;
- BO information being available towards public registers;
- Data being published in structured formats compliant with the BO Data Standard;
- The published data should indicate where information is missing, and the reason for this;
- Where there is legitimate reason to withhold information from publication, for example due to personal safety concerns, exemptions should be clearly defined and limited in scope;
- A general application to all legal entities in all economic activities;
- Full BO chain from target company to BO being captured including the companies in between;
- Users must be provided with enough information (company number, country of registration, etc.) to allow them to match with other datasets;
- For entities without BOs, or which are exempt from the requirements (e.g., publicly listed companies), identifying information about the entity should be recorded and published, including company name and Legal Entity Identifier (LEI) where available, or a stock ticker or International Securities Identification Number (ISIN) and the name of the stock exchange where they are listed;
- Showing when company statements were made to allow users to judge whether they trust the information;
- Companies should be required to update their BO information within a short, defined time period after their BO changes. In addition, mandating an annual confirmation of BO information will help keep the register up to date;
- A process should be put in place to identify company information that is suspected to be out-of-date, and action taken to resolve this.

Effective BO register data should enable:

- Reconciling data across systems;
- Merging and de-duping records;
- Tracking the history of data and its provenance;
- Analysing data; and
- Receiving submitted data from users.

The graphic<sup>17</sup> presentation below shows the components and steps to create BO data:



<sup>17</sup> Source: Openownership.org

## 5. Assessing progress in meeting Requirement 2.5 in PNG

The assessment of progress in meeting the EITI requirement 2.5 can be summarised as follow:

Elements of Requirement 2.5	Technical Element	References
Public register of BO - (2.5.a, recommended only)	Are there laws/regulations/policies in place to establish and maintain a public register of beneficial owners, including those of corporate entity(ies) that apply/operate/hold a participating interest in exploration/production of oil, gas or mining license/contract?	See sections : 4.1 & 4.2.1
Government's policy & MSG's discussions - 2.5.b	Documenting of government's policy and MSG's discussion on BO disclosure (legal provisions, practices & reforms).	See section : 4.1 and consult: <a href="http://www.pngeiti.org.pg/beneficial-ownership/">http://www.pngeiti.org.pg/beneficial-ownership/</a> See section 4.2 for recommended reforms
Request and disclosure of BO Information, gaps & weaknesses - 2.5.c	Has the implementing country requested BO information to be publicly disclosed by corporate entity(ies) that apply for or hold a participating interest in an exploration or production oil, gas or mining license or contract? Does the legal framework back the request? (2.5.c)	See sections 2.4, 4.1 and 4.2 See section 4.2 for recommended legal framework reforms
	Have any corporate entity(ies) that apply for or hold a participating interest in an exploration or production oil, gas or mining license or contract disclosed the information?	See sections 2.1, 2.2, 2.4, 3.1, 3.2, 3.3 and annexes 1&2
	Does the requested information include the identity(ies) of their beneficial owner(s), the level of ownership and details about how ownership or control is exerted?	
	Has the MSG assessed gaps or weaknesses on the disclosure of BO information, including an assessment of the materiality of omissions and the reliability of BO information? (2.5.c)	See section 3
Information about the identity of the BO - 2.5.d	Does the requested information include details of the identity of the beneficial owner(s), including nationality, country of residence, and identification of politically exposed persons? (2.5.d)	See sections 2.1 and 2.2 and annexes 1&2
Assurances on the accuracy of information - 2.5.e	Has the relevant government entity or the MSG established an approach for participating companies to assure the accuracy of the beneficial ownership information they provide? (2.5.e)	See sections 2.3 and 4.2.3
BO definition, disclosure for publicly listed companies & joint ventures. - 2.5.f	For publicly listed companies, including wholly-owned subsidiaries, has the name of the stock exchange been disclosed and a link included to the stock exchange filings where they are listed, in the public register or in the EITI Report? (2.5.f)	See Section 3.2, 3.3 and annex 3.
	Has the MSG agreed an appropriate definition of the term beneficial owner? (2.5.f) <ul style="list-style-type: none"> <li>Is the definition aligned with Requirement 2.5.f.(i) and does it take international norms and relevant national laws into account?</li> <li>Does it include ownership threshold(s) and specify reporting obligations for politically exposed persons?</li> <li>Is the definition included in the EITI Report or does the report include a reference or link to another public source (e.g., a law) that includes the definition?</li> </ul>	See Section 2.1
Disclosure of legal owners. - 2.5.g	Is information about legal owners and share of ownership of such companies publicly available? (2.5.g)	See section 4.2.1

# Annexes

**Annex 1 - BO Declaration form**

**BENEFICIAL OWNERSHIP DECLARATION**

The form has 2 parts (worksheets):

Part A covers the company identification details

Part 2 is a beneficial ownership declaration form to be filled in for each beneficial owner. If there is more than one beneficial owner, please complete one worksheet per beneficial owner

It is required that fields marked in orange are completed by the company

It is optional that fields marked in green are completed by the company, unless the MSG decides otherwise. The MSG should decide on this and adjust the colours accordingly prior to distributing the template.

For questions on filling in this form, please contact [Name or Office of form administrator, email / phone number]

The template includes comment boxes that provide guidance on how to complete each section. These comment boxes should be removed by the company prior to submitting the declaration form.

**Company filing the declaration:**

Reference to license(s) held by company

**Status**

Number of identified Beneficial Owners	<insert number>
Data on the Beneficial Owner was collected and was reported in sheet DF 3	<choose option>
The company is exempt from communicating data on Beneficial Owners (Publicly listed company or more than 95% owned subsidiaries of publicly listed company ), the details of which is disclosed in sheet DF 2	<choose option>
The shareholder holding more than 95% is a Governing authority, bodies, agencies or legal persons governed by public national laws, the details of which is disclosed in sheet DF 2	<choose option>
Company has no Beneficial Owner	<choose option>
Sufficient data could not be collected to identify the Beneficial Owners	<text>

**Limitation**

*If sufficient data could not be collected to identify the Beneficial Owners, please explain the reasons:*

**Attestation**

I, the undersigned, for and on behalf of the reporting entity, confirm that all information provided above and in the attached beneficial ownership declaration(s) is accurate and complete. If the attestation needs to be filled in by a person with a certain level of seniority within the organisation, please indicate this in this section.

Date	<YYYY-MM-DD>
First name, Last name	<text>
Position	<text>
Telephone number	<text>
Email address	<text>
Signature	<text>

Please find attached the following supporting documents verifying the accuracy of the beneficial ownership information submitted:

<text>
<text>



## A. Company

1. Company data	Entry	Comments
Registered name of the company (including legal form of legal entity)	<legal name> <legal form>	
Country of registration	<country>	
Unique identification number (i.e. registration number)	<number>	
Registration authority (name of Ministry or agency that issued the unique identification number)	<text>	
Contact address (registered office)	<address>	
Contact address (Address for services)	<address>	
<b>2.State Participation</b>		
<i>If the company is (100%) state owned:</i>		
Company is a state-owned (state shareholding) company	<choose option>	
State title 1	<text>	
State title 2	<text>	
Equity participation	<percentage>	
<b>3. Publicly-listed Company</b>		
3.1 Company is a Publicly listed entity	<choose option>	
Stock Exchange Name	<text>	
Legal Entity Identifier (LEI)	<identifier>	
Link to stock exchange documents (must include the link to BO disclosure)	<URL>	
3.2 Company is a wholly owned subsidiary of publicly listed entity	<choose option>	
Full legal name of listed entity	<legal name> <legal form>	
Stock Exchange Name	<text>	
Legal Entity Identifier (LEI)	<identifier>	
Link to stock exchange documents (must include the link to BO disclosure)	<URL>	
<b>4. Legal ownership</b>		
Full name of direct shareholder(s) (i.e. legal owners of company)	<text>	
% interest	<percentage>	
Is this shareholder a natural person (NP), a legal person (LP) or a state entity	Legal Person (LP)	
Country of registration (or nationality of a natural person)	<text>	
Unique identification number (i.e. registration number) (if LP)	<number>	
Publicly listed entity (for LP)	Yes	
Stock Exchange Name (if Publicly-listed entity)	<text>	
Legal Entity Identifier (LEI) (if Publicly-listed entity)	<identifier>	
Link to stock Exchange documents (must include the link to BO disclosure)	<URL>	
<i>(Please add more rows below if there are more than one direct shareholder)</i>		



**B. Beneficial Owner N°** <insert number>

In accordance with this beneficial ownership definition, as per the BO instruction as per date

beneficial owner/s of the company are: ① <DD-MM-YYYY>

		Entry			Entry
<b>1. Beneficial Owner identity data</b>					
Full name as it appears on national identify card	<text>				
Date of Birth	<YYYY-MM-DD>				
National identity number*	<number>				Number will not be made public
Nationality	<select>				
Country of residence	<select>				
Residential address	<text>				
Service address	<text>				
Other means of contact	<text>				
<b>2. Status of a Politically Exposed Person</b>					
Is the Beneficial Owner a Politically exposed person (PEP)?	<choose option>				
Reason for PEP designation /position	<text>				
Country where the role is held	<country>				
Applicable from	<YYYY-MM-DD>				
Applicable to	<YYYY-MM-DD>				
<i>If several positions are held by the same person, copy and paste the rows and insert them below.</i>					
<b>3. Information about how ownership is held or control over the company is exercised</b>					
<b>3.1 Alone or Jointly with an associate person(s) controls or owns at least 5%of the company shares/voting rights (irrespective of the level of control in case beneficial owner is a Politically Exposed Person)</b>					
By direct shares	<choose option>	Number of shares	<number>	% of shares	<number>
By direct voting rights	<choose option>	Number of votes	<number>	% of voting rights	<number>
By indirect shares	<choose option>	Number of indirect shares	<number>	% of indirect shares	<number>
By indirect voting rights	<choose option>	Number of indirect votes	<number>	% of indirect voting rights	<number>
<b>Total shares</b>		<b>Number of shares</b>	<number>	<b>% of shares</b>	<number>
<b>Total voting rights</b>		<b>Number of votes</b>	<number>	<b>% of voting rights</b>	<number>
<b>Number of intermediary entities</b>	<number>				
<b>3.2 Has the right to exercise influence or control over the company by other means</b>	<choose option>	Receives not less than 5% of Company's annual revenue (irrespective of the level of control or ownership)			
	<choose option>	Holds the right to appoint of dismiss executive of the company			
	<choose option>	Holds the right to exercise influence and control over the management and operations of the company or has the capacity to predetermine decisions through other means, including and not limited : Trust management agreement/Agreement on joint activities/Option agreement/shares for debt agreement			
	<choose option>	Other means	<Explanation of how ownership is exercised >		
<b>3.3 Acquisition date</b>					
	<YYYY-MM-DD>				
<i>If the person holds several stakes through different intermediary companies, insert extra rows to list the indirect interest and through what legal owner.</i>					
<b>3.4. Intermediary Legal Entity with indirect Shareholding (If indirect, through what legal owner and intermediary company)</b>					
Legal name of intermediate company	<text>				
Unique identification number	<text>				
Country of registration	<text>				
Legal Entity operates for beneficial owner :	<choose option>				
<i>(add rows as necessary)</i>					

## Annex 2 -BO Declaration Guidelines

### FOREWORD

This document is intended to provide general guidance on what reporting entities must do to comply Requirement 2.5 of the EITI Standard<sup>18</sup> and to help a legal entity comply with the Beneficial Ownership (BO) requirements under the EITI Standard.

This Guidance Note should not be construed as legal advice and is not intended to be relied upon in relation to any specific matter. It deals in broad terms only and is intended merely to provide general guidance.

### Part 1: BO declaration framework

#### 1.1. International Commitment

EITI Standard requires implementing countries to ensure that companies that apply for or hold a participating interest in oil, gas or mining license or contract in their country disclose their Beneficial Owners (BOs). Such information must also be accessible and made available to public.

PNG, as EITI implementing country, has committed and continues to strive to meet the EITI Standard requirements.

#### 1.2. The requirements at a glance

Legal entities that apply for or hold a participating interest in oil, gas or mining license or contract in PNG, including foreign companies, are required to submit a BO declaration. As a result, these entities:

- should take reasonable steps to identify the individual BOs, if any, of a legal entity;
- should contact these persons whom it believes to be registrable persons, to confirm whether they meet the conditions and, if so, obtain the minimum required information in respect of such registrable persons;
- should file the minimum required information with respect to BOs and PEPs, as defined below in Part 2.1;
- should enter the minimum required information on the legal entity's BO declaration (see Part 3);
- should keep the minimum required information on such BOs and PEPs up-to-date (see Part 4).

#### 1.3. Applicability of the BO requirements

The requirement to submit a BO declaration applies to all registered legal entities that apply for or hold a participating interest in an exploration or production of oil, gas or mining license or contract, except those that are specifically exempted as set forth below in Part 2.5.

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<sup>18</sup> See <https://eiti.org/document/eiti-standard-2019#r2-5> for the requirement in full. And the guide (<https://eiti.org/beneficial-ownership#eiti-guidance-and-publications-on-beneficial-ownership>) for further guidance on BO transparency.

## Part 2: Who is a Beneficial owner (BO)

### 2.1. Who is a Beneficial Owner?

Beneficial owners are always natural persons who ultimately own or control a legal entity.

A “beneficial owner” of a legal entity is the natural person(s) who ultimately control(s) or own(s) the legal entity, whether such ownership or control is direct or indirect.

For the purposes of this Clause, if a natural person directly or indirectly:

- a) owns or controls 5% or more of the shares or voting rights in a legal entity; or
- b) in the case where the natural person is a Politically Exposed Person, that natural person owns a single share or a single voting right or more in a legal entity; or
- c) has the right to appoint, veto the appointment or remove a majority of the board of directors or equivalent body of a legal entity or legally binding arrangement; or
- d) in circumstances where a) to c) do not apply, has the right to exercise, or actually exercises, significant influence or control over or derives significant economic benefit from a legal entity;,
- e) For the avoidance of doubt agents, nominees, trustees and other intermediaries shall not be deemed to be a beneficial owner.
- f) In the case of a joint venture, each entity within the venture should disclose its beneficial owner(s).

#### Exceptions

Publicly listed companies, including wholly-owned subsidiaries, are required to disclose the name of the stock exchange and include a link to the stock exchange filings where they are listed.

If a government or governmental body would, if it were a natural person, be deemed to be a beneficial owner pursuant to clause 1 above then that government or governmental body shall be a beneficial owner.

#### Politically Exposed Person

*“The term ‘politically exposed person’ means:*

- a) A natural person who is or has been entrusted with prominent public functions in a foreign country with prominent public functions, including but not limited to, a Head of State or the head of a government, a senior politician, a senior government official, a senior judicial or a senior military official; or
- b) A natural person who is or has been a senior executive in a foreign country of a state-owned company of that foreign company; or
- c) A natural person who is or has been a senior political party official in a foreign country; or
- d) A natural person who is or has been entrusted with a prominent function by an international organisation, including but not limited to directors, deputy directors and members of the board or equivalent positions; or
- e) A natural person who or has been entrusted in Papua New Guinea with prominent public functions as listed in Section 26 (Application of Division 2) of the Constitution; or
- f) A natural person who is a family member or is known to be a close associate of a person mentioned in paragraphs (a) to (e)”

*For the purpose of clause 3, ‘family members’ definition includes the following:*

- *the spouse, or a person considered to be equivalent to a spouse, of a politically exposed person;*
- *the children or grandchildren and their spouses, or persons considered to be equivalent to a spouse, of a politically exposed person;*
- *the parents or grandparents of a politically exposed person, whether such relationship be natural, adoptive or otherwise.*

*‘persons known to be close associates’ means:*

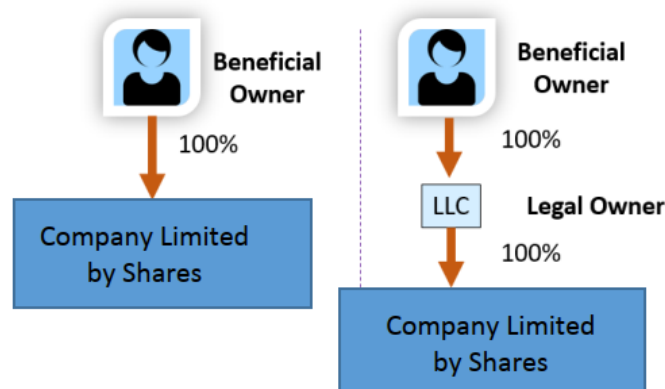
- *natural persons who have joint BO of legal entities or legal arrangements, or any other close business relations, with a politically exposed person;*
- *natural persons who have sole BO of a legal entity or legal arrangement which is known to have been set up for the de facto benefit of a politically exposed person. “*

## 2.2. How does a legal entity determine BO?

Given that BO or control of shares, interest or rights can be exercised in many different ways, determining the BO of a legal entity can be a complex process that must be undertaken on a case-by-case basis. Note, also that, determining the BO is independent of the BO's nationality and place of residence.

The use of a legal entity or arrangement can obscure identity of a beneficial owner. Where an individual is the sole shareholder of a company and controls it directly, that individual is the BO of the company. However, there may be more layers involved in the ownership structure, perhaps a chain of entities between a legal entity and its BO. In Figure 1, the example on the right side shows an additional layer - the Limited Liability Company (LLC) - between the legal entity (the company) and its beneficial owner. The LLC, as the shareholder of the company, is its direct legal owner, while the beneficial owner indirectly controls the company through the LLC.

Figure 1: Difference between beneficial owner and legal owner



When identifying a Beneficial Owner, a company shall have regard to the following:

- Its Articles of Incorporation and amendments thereto;
- Agreements pertaining to the corporation's establishment;
- Shareholders' resolutions;
- Information from private institutions in which the proceeds of share sales are deposited or transferred to;
- Documents belonging to the company or third party that shows that the individual concerned is the true owner of the company's share capital;
- Documents belonging to the company or third party that shows that the individual concerned is the true owner of financial or other assets, or an investment in the company, and/or;
- Other information whose accuracy is capable of being verified.

### 2.3. Why is it important to identify BOs?

Anonymity enables many illegal activities to take place hidden from law enforcement and regulatory authorities, such as tax evasion, corruption, money laundering, and terrorist financing.

For example, money laundering involves complex operations and transactions to make money from illicit sources, in order to appear to have legal sources, while in reality the money is from illicit activities.

In a business setting, in particular, it is therefore important to know the BOs of legal entities and arrangements to prevent misuse of such structures.<sup>19</sup> Whilst it is open to persons to create sophisticated corporate structures including corporate structures across jurisdictions, the concern is that certain persons could use such structures for illegal purposes such as to obscure their identity, income or property ownership.

### 2.4. Establishing BO

A BO can only be a natural person. A legal entity cannot be a beneficial owner and must determine the identity of its BOs. Moreover, there may be more than one BO of a legal entity that owns or controls, through direct or indirect ownership, 5% or more of the shares in a company.

#### ❖ Calculating shareholdings

In the case of a company limited by shares, information in its register of members can assist a company in determining whether any individual or individuals directly own or control at least 5% of its shares.

All shares issued (whether voting or non-voting) by a company should be included when calculating shareholdings. However, shares which have never been issued or which have been bought back and cancelled by the company should not be included in the calculation. If a company's shares or voting rights are held by legal arrangement, the company should take steps to identify the BOs of that legal arrangement.

BO must be determined in relation to another person in certain situations including, but not limited to:

- shares or voting rights that are held jointly by two or more persons, each person must be treated as holding the entirety of the shares or rights;
- shares or voting rights that are not held jointly and are subject to an arrangement between the people who hold them (whether or not the arrangement is in writing) that they will exercise their rights in the same way, each person who is party to the arrangement must be treated as holding the entirety of the shares or rights that are covered by the arrangement. This applies to voting rights attached to shares or any other rights;
- a person controls a voting right held by another, the person with control must be treated as holding the right. This is also the case if the person who holds the right, the latter also has control of such right. If, however, the person who holds the right has to act entirely as directed by another, only that person directing the actions should be treated as holding the right.

If no individual's holding meets the threshold of 5% of shares or voting rights, that individual will still be a beneficial owner if he or she is a Political exposed Person (PEP) or has the right to appoint, veto the appointment or remove a majority of the board of directors or equivalent body of a legal entity or legally binding arrangement.

#### ❖ Calculating BO of voting rights

The voting rights attached to any shares or LLC interests are likely to be set out in the legal entity's governing documents. Voting rights can be exercisable in different ways, including at general meetings or through written resolutions. Often one vote is attached to one share or percentage of interest, but the entity may have different classes of shares or interests with different rights. Some shares or interests may have no voting rights, or the right to vote only in certain circumstances, or additional rights to more than one vote per share or percentage of interest.

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<sup>19</sup> For this reason, EITI, FATF and OECD have included BO requirements in their standards and conduct peer review assessments across jurisdictions, on availability of such BO information.

Where shares or interests in a legal entity are directly owned and the voting rights attached to shares or LLC are set out in such governing documents, then the information contained in the register of members and the voting rights provisions of the governing documents may enable such entity to work out if any individual or entity directly at least 5% of the voting rights. Voting rights attached to shares that have been bought back and are held as treasury shares or interests should not be included.

In the case of LLC interests, all interests which are allocated to the members of the LLC should be used to calculate the percentage of LLC interests held by any member. This may correspond with the voting rights, or if the interest does not carry the right to vote, the rights of members to share in the profits of the LLC.

#### ❖ Control by other means

Any individual exercising control over an entity whether directly or indirectly, should be identified as a beneficial owner (subject to the 5% threshold, as mentioned in Part 2.1).

It is not possible to give an exhaustive definition of “control” because it will depend on the particular circumstances of each specific legal entity. However, generally speaking, an individual is likely to have control over a legal entity in situations which include, but not limited to:

- (i) The individual holds, directly or indirectly, at least 5% of the shares, interests or voting rights in an entity, which may include having absolute decision or veto rights over the running of the business of the legal entity;
- (ii) The individual holds the right, directly or indirectly, to appoint, veto the appointment or remove a majority of the board of directors or equivalent body of the legal entity;
- (iii) The individual otherwise has the right to exercise, or actually exercises, significant influence and control over the management and operations of the company;
- (iv) The individual otherwise has the capacity to predetermine decisions through other means, including and not limited to:

- Trust management agreement
- Agreement on joint activities
- Option agreement
- shares for debt agreement

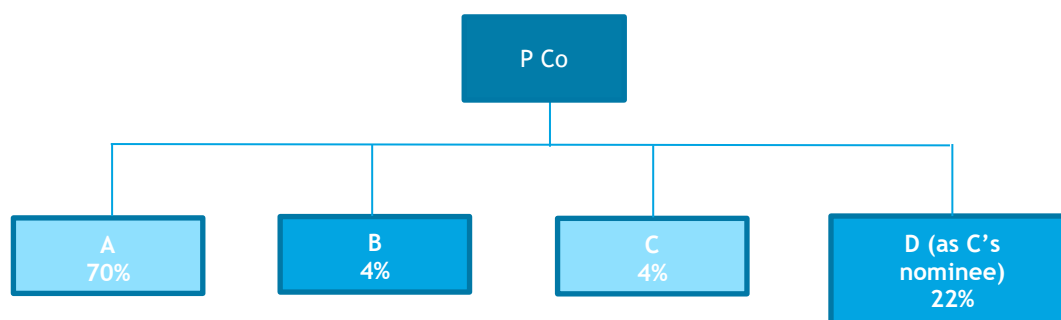
Control will not ordinarily arise in the context of a standard professional or commercial relationship between the legal entity and an individual such as a legal adviser, an accountant, a client, a lender or a supplier, nor will it ordinarily arise in the context of the exercise of a statutory function such as that of a regulator or a liquidator.

#### ❖ Further guidance on other ownership arrangements

##### ➤ Nominees

If shares, voting rights or interests are held by a nominee, these should be treated as if they were held by the person for whom the nominee is acting. If this individual is a BO, the minimum required information in respect of that BO on the BO declaration should be entered. If the nominee is acting for a legal entity or legal arrangement, a legal entity must follow the steps in Part 2 as it would for any other legal entity or legal arrangement with an interest in such entity.

Figure 2



In Figure 2, P Co is a PNG company in which A holds 70% of the shares, B and C each hold 4% of the shares, and D holds 22% of the shares as nominee for C. As A holds more than 5% of the shares in P Co, A is a beneficial owner of P Co. B holds less than 5% of the shares in P Co, so B is not a beneficial owner of P Co. Although C only holds 4% of the shares in his own name, D holds a further 22% of the shares as C's nominee. Shares held by D must be treated for purposes of determining BO as belonging C, not D. This means that C holds more than 5% of the shares in total, so C is a beneficial owner of P Co.

➤ **Jointly and severally held interests**

If two or more people jointly and severally hold shares, voting rights or interests, each of them is treated as holding the total number of shares, interests or voting rights held by all of them. Therefore, if two or more people hold jointly and severally 5% or more of the shares, interests or voting rights, the minimum required information in respect of each of them must be separately entered on the BO declaration.

➤ **Joint arrangements**

A joint arrangement includes proxy agreements, voting blocs, and any scheme, agreement or understanding, whether or not legally enforceable and any convention, custom or practice of any kind. It does not include one-off arrangements, partnerships or LLCs.

If two or more people have such an arrangement, which relates to voting rights or interests in a legal entity, each of them is treated as holding the total number of shares or percentage of interests held by all of them. Where an arrangement covers at least 5% of the shares or interests, the minimum required information in respect of each party to the arrangement must separately be entered on the BO declaration. If the arrangement covers appointment or removal of directors with a majority of board level voting rights, then the minimum required information in respect of each party to the arrangement must be separately entered on the BO register.

➤ **Option agreement**

Voting rights and rights to appoint or remove company directors, LLC managers or general partners may only be exercisable in certain circumstances. If the circumstances under which the rights are exercisable are within the control of the individual who holds them, then they are relevant for identifying the BO of a legal entity. Otherwise, a legal entity should only consider these rights if those circumstances have arisen, and for as long as those circumstances continue.

## 2.5. Exemptions

➤ **Publicly listed company**

The requirements to obtain BO information do not apply to entities whose shares are listed on Port Moresby Stock Exchange or other appointed stock exchange. In addition, more than 95% owned subsidiaries of such entities are also exempted from these. However, these entities are required to collect and submit data legal ownership and on the publicly listed shares, including stock exchange name, Legal Entity Identifier (LEI) and link to the stock exchange documents/filings. The data for each Stock Exchange shall be filled in separately.

➤ **State owned company**

If the shareholder holding more than 95% is a Governing authority, bodies, agencies or legal persons governed by public national laws, the requirements to obtain BO information do not apply. Example would be an investment by a District Development Authority in the mining or petroleum sector in which the beneficial owner is the provincial government and not a specific person or individual. However, the legal entity is required to collect and submit data on state participation and legal ownership.

## 2.6. When a BO cannot be identified

- Where a legal entity is unable to immediately identify its BOs

If a legal entity has reason to believe that it has a BO but it was unable to identify within the reporting timeframe, the company should submit the BO declaration on time and indicate, for example:

“The company has not yet completed the process of taking reasonable steps to identify anyone who is a BO in relation to the company.”

- Where a legal entity is unable to verify BOs data

If a company has one or more BOs but is unable to verify the information relating to such person(s), when it has taken reasonable steps to do so, it must note this fact on the BO declaration. The BO declaration should indicate that, for example:

“The company knows or has reasonable cause to believe that there is a BO in relation to the company, but it has not been able to verify such BO.”

- Where a legal entity has identified a BO but cannot confirm the BO details

A company may find that it has identified the BO but is unable to confirm one or more pieces of the minimum required information, it must note this fact on the BO declaration. The BO register should indicate that:

“The company has identified a BO in relation to the company, but the minimum required information in respect of that person has not been confirmed”.

## Part 3: Procedure for filling-in and submitting Declaration on Beneficial Owners

### 4.3. Declaration Structure

DF1. BO declaration includes the signed statement of submitting person along with data on beneficial owners, which shall be filled in Sections A to B according to the instructions below. In this statement the company is required to tick off certifying:

- the number of identified beneficial owners;
- the exemption from BO data declaration (filling Section A) if the company is a publicly listed company, a wholly owned subsidiary of a publicly listed company or if the BO is a State;
- the absence of a Beneficial Owner -if surveys have revealed that no natural person is considered as beneficial owner of a particular company for the purpose of EITI reporting; and
- the information provided is accurate and complete. If not, the company is required to explain the reasons thereof.

DF2. Section A shall be filled in data on the legal entity (hereinafter referred to as company) submitting the Declaration. Each company shall fill in this section only once.

DF3. Section B shall be filled in data on the natural person - the beneficial owner. This section shall be filled in separately for each of the company’s beneficial owner. Each beneficial owner is given a number (1, 2, 3, etc.)

### 4.4. The rules of completing Section A - Company

**1. Company data:** Name and registration data of the company shall be filled in this subsection, including name of the company, the country of registration, the registration number and the office address of the company by which the registration of the company has been carried out.

**2. State Participation:** Data on State participation in the company shall be filled in this subsection. Any direct or indirect State ownership of the Company shall be filled in the Table regardless of the participation percentage.



### 3. Publicly listed Company:

3.1 This subsection shall be ticked off to certify public listing of the company. Data on the publicly listed shares shall be filled in this subsection, including stock exchange name, Legal Entity Identifier (LEI) and link to the stock exchange documents/filings. The data for each Stock Exchange shall be filled in separately.

3.2 In case of ticking off the field “Company is a wholly owned subsidiary of a publicly listed entity,” the company shall fill in data of the publicly listed Legal Entity including the name of the legal entity, stock exchange name, Legal Entity Identifier (LEI) and link to the stock exchange documents/filings.

**4. Legal ownership** - Data on shareholding in the Company shall be filled in this subsection, including the names of direct shareholders, the participation interest, the nature, the country of registration and the identification number. If the shareholder is a publicly listed entity, the stock exchange name, Legal Entity Identifier (LEI) and link to the stock exchange documents/filings shall be filled in this section.

The data for each shareholder shall be filled in separately.

#### 4.5. The rules of completing Section B - Beneficial owner

**1. Beneficial Owner’s identity data** - Personal identity data of a beneficial owner shall be filled in this subsection as given in the beneficial owner’s ID. Beneficial owner’s contacts and address of residence shall also be filled in this subsection.

**2. Status of a Politically Exposed Person** - This subsection shall be ticked off, if the beneficial owner is considered a Politically Exposed Person for the purpose of the EITI Reporting. The company determines the circumstance of being a PEP based on the data that became available no longer than 30 days before the day of submission of the Declaration on BO.

**3. Information about how ownership is held or control over the company is exercised** - The grounds for being considered a beneficial owner of the company shall be filled in in this subsection along with the required information related to these grounds. In case of being a beneficial owner on more than one grounds, all grounds shall be marked in the appropriate clauses.

3.1 This subsection shall be filled, if a natural person holds at least 5 percent of shares in the company, either through ownership of a stock/shares in the company (direct shareholding) or through ownership of a stock/shares of another Legal Entity owning a stock/shares in the company (indirect shareholding). Indirect shareholding may be exercised regardless of the number of intermediary legal entities in the chain of the “Natural person - Company”.

**A politically exposed person holding a stake in the company is considered the beneficial owner regardless of the level of control or ownership.**

Total shares/voting rights shall be calculated based on the sum of all the percentages of shares/voting rights in the company both directly and indirectly owned by the beneficial owner. In the event of indirect shareholding, the share of the beneficial owner in the company shall be calculated based on the participation/voting rights percentage of each previous intermediary entity, namely, by multiplying the percentage of the Legal Entity’s shares in the company by the percentage of shares of relevant intermediary entity in the Legal Entity owning shares in the company and so on.

In case the field “indirect shareholding” is filled, the number of intermediary entities operating in the chain of the company and beneficial owner shall be filled in for the relevant beneficial owner.

3.2 This shall be filled, if the natural person holds the right to exercise influence or control over the company by other means. The legal basis underlying such a capacity shall be mentioned, if available.

3.3 In the field “Acquisition date”, the date of the last acquisition, by the power of which a person becomes a beneficial owner of the company shall be filled in, and if the person has become a beneficial owner on another ground, the date of becoming a beneficial owner is indicated.

3.4 Data on shareholding of the intermediary legal entity, either direct or indirect or a combination of both in the company, shall be filled in in this subsection.

#### **Part 4: Submission of declaration**

The minimum required information in respect of the company and BO data should be filled in the declaration form. The scanned version of the signed declaration should be submitted to .....no later than ..... 2020.

No matter when it was incorporated or formed, the company must ensure that the information filed is up to date.

The declaration is filed with all the sections enclosed to the statement signed by the person entitled to submit the company's declaration. The statement shall indicate the first and last names of the person submitting the declaration, their position in the company, their contact details (email and phone number) and the date of submission.

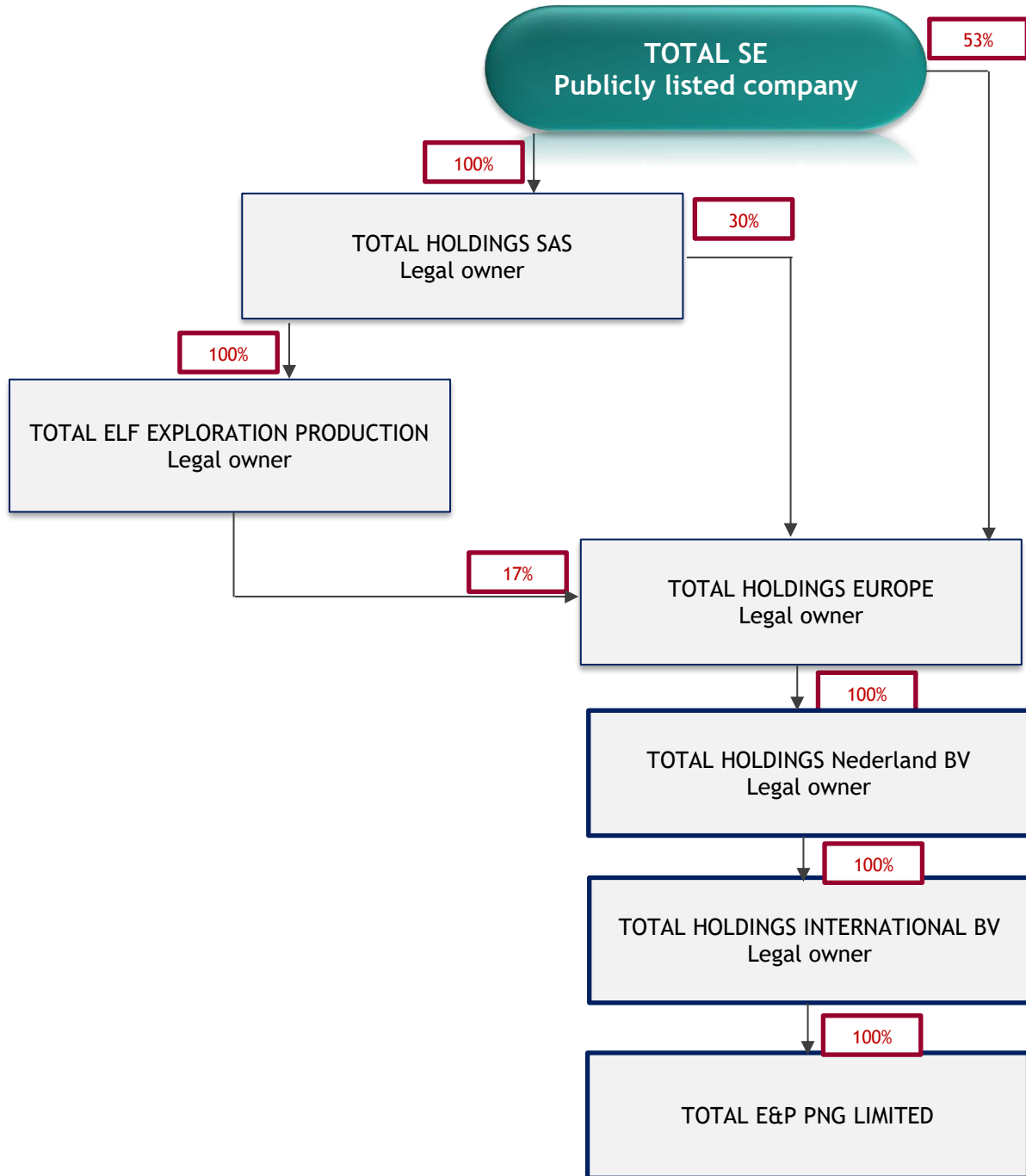
When submitting a declaration or within 1 month after its submission, the company may be requested to provide a document certifying the ownership right of the legal entity's equity share issued by the relevant competent authority (including foreign country's) and any other document certifying the accuracy of the BO information submitted.

Where there are changes to the minimum required information concerning individual BOs or where an individual BO has changed throughout the year, the minimum required information relating the company's individual BOs should be updated and a BO declaration submitted as soon as practicable, but not later than 30 days after the minimum required information has been confirmed by the company in respect of the change.

Annex 3 -Company Ownership Map & Bo declaration

1. Total E&P PNG Ltd

(i) Company ownership map



## (ii) Beneficial Ownership Declaration

**BENEFICIAL OWNERSHIP DECLARATION**

The form has 2 parts (worksheets):

Part A covers the company identification details

Part 2 is a beneficial ownership declaration form to be filled in for each beneficial owner. If there is more than one beneficial owner, please complete one worksheet per beneficial owner

It is required that fields marked in orange are completed by the company

It is optional that fields marked in green are completed by the company, unless the MSG decides otherwise. The MSG should decide on this and adjust the colours accordingly prior to distributing the template.

For questions on filling in this form, please contact [Name or Office of form administrator, email / phone number]

The template includes comment boxes that provide guidance on how to complete each section. These comment boxes should be removed by the company prior to submitting the declaration form.

**Company filing the declaration:**

TOTAL E&P PNG LIMITED	
Reference to license(s) held by company	PRL15,PPL576,PPL589

**Status**

Number of identified Beneficial Owners	NA
Data on the Beneficial Owner was collected and was reported in sheet DF 3	No
The company is exempt from communicating data on Beneficial Owners (Publicly listed company or more than 95% owned subsidiaries of publicly listed company), the details of which is disclosed in sheet DF 2	Yes
The shareholder holding more than 95% is a Governing authority, bodies, agencies or legal persons governed by public national laws, the details of which is disclosed in sheet DF 2	No
Company has no Beneficial Owner	No
Sufficient data could not be collected to identify the Beneficial Owners	No

**Limitation****Attestation**

I, the undersigned, for and on behalf of the reporting entity, confirm that all information provided above and in the attached beneficial ownership declaration(s) is accurate and complete. If the attestation needs to be filled in by a person with a certain level of seniority within the organisation, please indicate this in this section.

Date

First name, Last name

Position

Telephone number

Email address

Signature

2020-10-30

Maryline SANTINA

Finance Controller

+675 73178845

maryline.santina@total.com

Please find attached the following supporting documents verifying the accuracy of the beneficial ownership information submitted:

<https://www.total.com/investors/shares-and-dividends/ownership-structure>



## A. Company

1. Company data	Entry	Comments
Registered name of the company (including legal form of legal entity)	TOTAL E&P PNG LIMITED	
Country of registration	Papua New Guinea	
Unique identification number (i.e. registration number)	1-32894	
Registration authority (name of Ministry or agency that issued the unique identification number)	IPA Papua New Guinea	
Contact address (registered office)	Port Moresby	
Contact address (Address for services)	Port Moresby	
<b>2. State Participation</b>		
<i>If the company is (100%) state owned:</i>		
Company is a state-owned (state shareholding) company	No	
State title 1		
State title 2		
Equity participation		
<b>3. Publicly-listed Company</b>		
<b>3.1 Company is a Publicly listed entity</b>	No	
Stock Exchange Name		
Legal Entity Identifier (LEI)		
Link to stock exchange documents (must include the link to BO disclosure)		
<b>3.2 Company is a wholly owned subsidiary of publicly listed entity</b>	Yes	
Full legal name of listed entity	TOTAL SE	
Stock Exchange Name	Euronext	
Legal Entity Identifier (LEI)	529900521EQ1B04E5M68	
Link to stock exchange documents (must include the link to BO disclosure)	<a href="https://sec.report/CIK/000879764">https://sec.report/CIK/000879764</a> <a href="https://www.total.com/investors/shares-and-dividends/ownership-structure">https://www.total.com/investors/shares-and-dividends/ownership-structure</a>	
<b>4. Legal ownership</b>		
Full name of direct shareholder(s) (i.e. legal owners of company)	TOTAL HOLDINGS INTERNATIONAL BV	
% interest	100.00%	
Is this shareholder a natural person (NP), a legal person (LP) or a state entity (S)	Legal Person (LP)	
Country of registration (or nationality of a natural person)	NL	
Unique identification number (i.e. registration number) (if LP)	54265258	
Publicly listed entity (for LP)		
Stock Exchange Name (if Publicly-listed entity)		
Legal Entity Identifier (LEI) (if Publicly-listed entity)		
Link to stock Exchange documents (must include the link to BO disclosure)		
<i>(Please add more rows below if there are more than one direct shareholder)</i>		

### (iii) Link to BO disclosure of Total:

#### Item 5. Ownership of Five Percent or Less of a Class.

If this statement is being filed to report the fact that as of the date hereof the reporting person has ceased to be the beneficial owner of more than five percent of the class of securities, check the following .

#### Item 6. Ownership of More Than Five Percent on Behalf of Another Person.

Not Applicable.

#### Item 7. Identification and Classification of the Subsidiary Which Acquired the Security Being Reported on by the Parent Holding Company.

Not Applicable.

#### Item 8. Identification and Classification of Members of the Group.

Not Applicable.

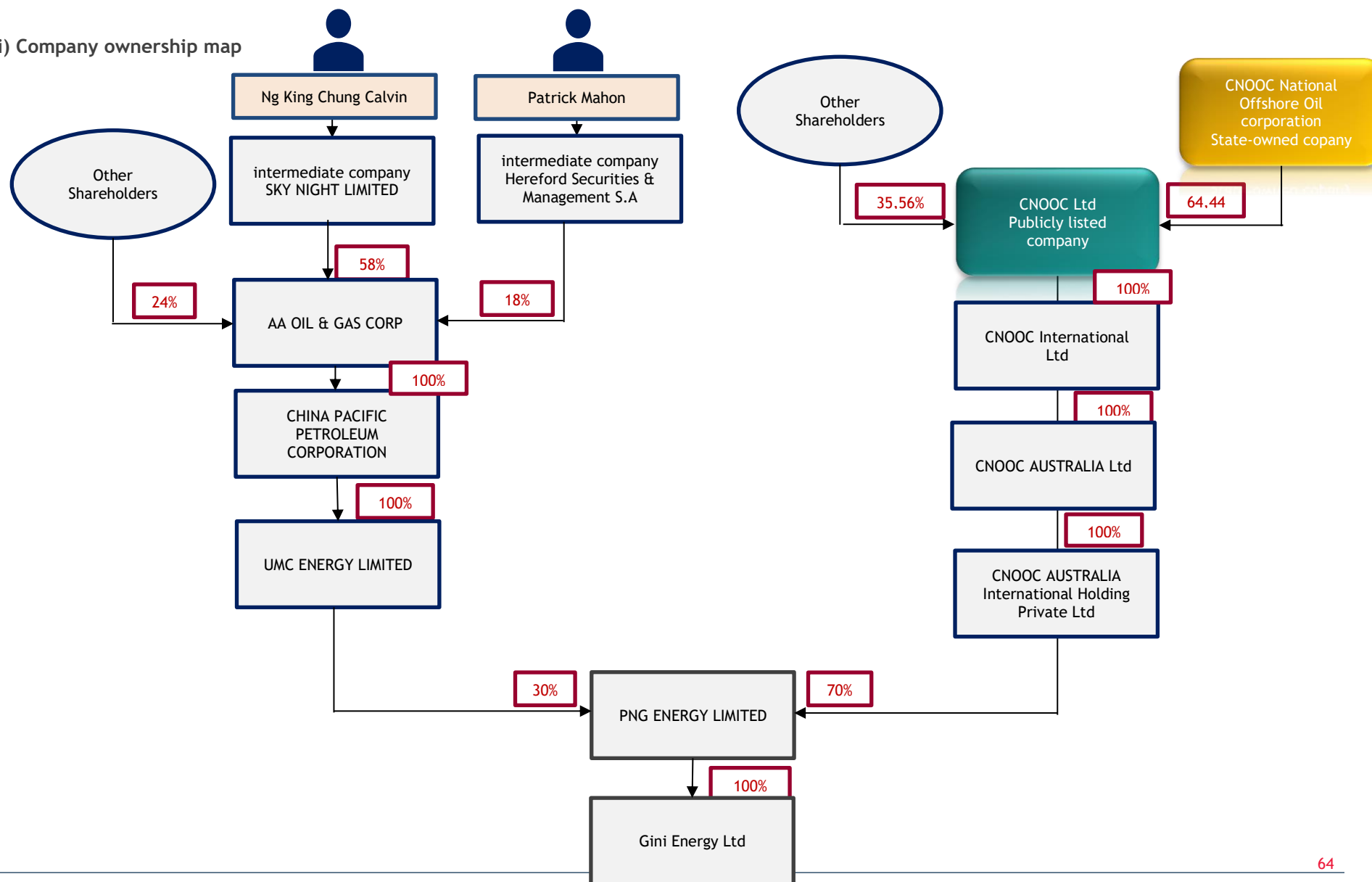
#### Item 9. Notice of Dissolution of Group.

Not Applicable.

[https://www.sec.gov/edgar/search/?r=el#/q=beneficial%2520ownership&dateRange=1y&category=form-cat0&ciks=0000879764&entityName=TOTAL%2520SE%2520\(TOT\)%2520\(CIK%25200000879764\)&filter\\_ciks=0000879764&filter\\_entityName=TOTAL%2520S.A.%2520%2520\(TOT\)%2520%2520\(CIK%25200000879764\)&filter\\_location=10](https://www.sec.gov/edgar/search/?r=el#/q=beneficial%2520ownership&dateRange=1y&category=form-cat0&ciks=0000879764&entityName=TOTAL%2520SE%2520(TOT)%2520(CIK%25200000879764)&filter_ciks=0000879764&filter_entityName=TOTAL%2520S.A.%2520%2520(TOT)%2520%2520(CIK%25200000879764)&filter_location=10)

## 2. Gini Energy Ltd

(i) Company ownership map



(ii) Beneficial Ownership Declaration



**BENEFICIAL OWNERSHIP DECLARATION**

The form has 2 parts (worksheets):

Part A covers the company identification details

Part 2 is a beneficial ownership declaration form to be filled in for each beneficial owner. If there is more than one beneficial owner, please complete one worksheet per beneficial owner

It is required that fields marked in orange are completed by the company

It is optional that fields marked in green are completed by the company, unless the MSG decides otherwise. The MSG should decide on this and adjust the colours accordingly prior to distributing the template.

For questions on filling in this form, please contact [Name or Office of form administrator, email / phone number]

The template includes comment boxes that provide guidance on how to complete each section. These comment boxes should be removed by the company prior to submitting the declaration form.

**Company filing the declaration:**

Gini Energy Limited
Reference to license(s) held by company

**Status**

Number of Identified Beneficial Owners	2
Data on the Beneficial Owner was collected and was reported in sheet DF 3	Yes
The company is exempt from communicating data on Beneficial Owners (Publicly listed company or more than 95% owned subsidiaries of publicly listed company), the details of which is disclosed in sheet DF 2	No
The shareholder holding more than 95% is a Governing authority, bodies, agencies or legal persons governed by public national laws, the details of which is disclosed in sheet DF 2	No
Company has no Beneficial Owner	No
Sufficient data could not be collected to identify the Beneficial Owners	No

**Limitation**

If sufficient data could not be collected to identify the Beneficial Owners, please explain the reasons:

**Attestation**

I, the undersigned, for and on behalf of the reporting entity, confirm that all information provided above and in the attached beneficial ownership declaration(s) is accurate and complete. If the attestation needs to be filled in by a person with a certain level of seniority within the organisation, please indicate this in this section.

Date	2020-11-13
First name, Last name	Patrick Mahon
Position	Director
Telephone number	41793255709
Email address	mahonpaddy@gmail.com
Signature	

Please find attached the following supporting documents verifying the accuracy of the beneficial ownership information submitted:

<text>
<text>



A. Company

1. Company data	Entry	Comments
Registered name of the company (including legal form of legal entity)	Gini Energy Limited	
Country of registration	Papua New Guinea	
Unique identification number (i.e. registration number)	1-70498	
Registration authority (name of ministry or agency that issued the unique identification number)	Investment Promotion Authority IPA	
Contact address (registered office)	Suite 11, Section , Allotment 05, Building 1, Cameron Road, Hohola, National Capital District	
Contact address (Address for services)	Suite 11, Section , Allotment 05, Building 1, Cameron Road, Hohola, National Capital District	
2. State Participation		
<i>If the company is (100%) state owned:</i>		
Company is a state-owned (state shareholding) company	No	
State title 1	<text>	
State title 2	<text>	
Equity participation	<percentage>	
3. Publicly-listed Company		
3.1 Company is a Publicly listed entity	No	
Stock Exchange Name	<text>	
Legal Entity Identifier (LEI)	<identifier>	
Link to stock exchange documents (must include the link to BO disclosure)	<URL>	
3.2 Company is a wholly owned subsidiary of publicly listed entity	No	Company is a subsidiary for 70% of publicly listed entity
Full legal name of listed entity	CNOOC LTD	
Stock Exchange Name	U.S SECURITIES AND EXCHANGE COMMISSION	
Legal Entity Identifier (LEI)	CNOOC LTD (CEO) (CIK 0001095595)	
Link to stock exchange documents (must include the link to BO disclosure)	<a href="https://www.sec.gov/edgar/search/#/q=beneficial%20ownership&amp;dateRange=1%5B%3D0001095595&amp;entityName=CNOOC%20%20%20CEO%20%20(CIK%200001095595)">https://www.sec.gov/edgar/search/#/q=beneficial%20ownership&amp;dateRange=1%5B%3D0001095595&amp;entityName=CNOOC%20%20%20CEO%20%20(CIK%200001095595)</a>	
4. Legal ownership		
Full name of direct shareholder(s) (i.e. legal owners of company)	PNG ENERGY LIMITED	
% interest	100%	
Is this shareholder a natural person (NP), a legal person (LP) or a state entity (S)?	Legal Person (LP)	
Country of registration (or nationality of a natural person)	AUSTRALIA	
Unique identification number (i.e. registration number) (if LP)	3-83904	
Publicly listed entity (for LP)	No	
Stock Exchange Name (if Publicly-listed entity)	<text>	
Legal Entity Identifier (LEI) (if Publicly-listed entity)	<identifier>	
Link to stock Exchange documents (must include the link to BO disclosure)	<URL>	
<i>(Please add more rows below if there are more than one direct shareholder)</i>		





**B. Beneficial Owner N°**

1

In accordance with this beneficial ownership definition, as per the BO instruction as per date

2020-11-13

beneficial owner/s of the company are: ①

		Entry	Entry
<b>1. Beneficial Owner Identity data</b>			
Full name as it appears on national identify card		Patrick Mahon	
Date of Birth		1940-03-30	
National identity number*		PU2664739	Number will not be made public
Nationality		IRELAND	
Country of residence		SWITZERLAND	
Residential address		CHEMIN de BAFFA 8, 1184 VINZEL	
Service address		CHEMIN de BAFFA 8, 1184 VINZEL	
Other means of contact		mahonpaddy@gmail.com	
<b>2. Status of a Politically Exposed Person</b>			
Is the Beneficial Owner a Politically exposed person (PEP)?		No	
Reason for PEP designation /position		<text>	
Country where the role is held		<country>	
Applicable from		<YYYY-MM-DD>	
Applicable to		<YYYY-MM-DD>	
<i>If several positions are held by the same person, copy and paste the rows and insert them below.</i>			
<b>3. Information about how ownership is held or control over the company is exercised</b>			
<b>3.1 Alone or Jointly with an associate person(s) controls or owns at least 5% of the company shares/voting rights (Irrespective of the level of control in case beneficial owner is a Politically Exposed Person)</b>			
By direct shares	<choose option>	56 000 000	<number> % of shares 3%
By direct voting rights	<choose option>		<number>
By indirect shares	<choose option>	260 000 000	<number> % of indirect shares 15%
By indirect voting rights	<choose option>		<number>
Total shares		316 000 000	<number> % of shares 18%
Total voting rights			
Number of intermediary entities		<number>	
3.2 Has the right to exercise influence or control over the company by other means	<choose option>	Receives not less than 5% of Company's annual revenue	
	<choose option>	Holds the right to appoint or dismiss executive of the	
	<choose option>	Holds the right to exercise influence and control over the	
	<choose option>	Other means	<Explanation of how ownership is exercised
<b>3.3 Acquisition date</b>			
		2018-05-29	
<i>If the person holds several stakes through different intermediary companies, insert extra rows to list the indirect interest and through what legal owner.</i>			
<b>3.4. Intermediary Legal Entity with Indirect Shareholding (If indirect, through what legal owner and intermediary company)</b>			
Legal name of intermediate company		Hereford Securities & Management S.A.	
Unique identification number		85 494	
Country of registration		Belize	
Legal Entity operates for beneficial owner :		Both directly or indirectly	
<i>(add rows as necessary)</i>			



**B. Beneficial Owner N°** 2  
 In accordance with this beneficial ownership definition, as per the BO instruction  
 as per date 2020-11-13  
 beneficial owner/s of the company are: ①

Entry		Entry	
<b>1. Beneficial Owner identity data</b>			
Full name as it appears on national identify card	Ng King Chung Calvin		
Date of Birth	1967-02-09		
National identity number*	KJ0470678	Number will not be made public	
Nationality	China		
Country of residence	Hong Kong		
Residential address	Westwood, 6 Maize Path, Palm Springs, Yuan Long San		
Service address	Westwood, 6 Maize Path, Palm Springs, Yuan Long San		
Other means of contact	ngcalvin@163.com		
<b>2. Status of a Politically Exposed Person</b>			
Is the Beneficial Owner a Politically exposed person (PEP)?	No		
Reason for PEP designation /position	<text>		
Country where the role is held	<country>		
Applicable from	<YYYY-MM-DD>		
Applicable to	<YYYY-MM-DD>		
<i>If several positions are held by the same person, copy and paste the rows and insert them below.</i>			
<b>3. Information about how ownership is held or control over the company is exercised</b>			
<b>3.1 Alone or Jointly with an associate person(s) controls or owns at least 5% of the company shares/voting rights (irrespective of the level of control in case beneficial owner is a Politically Exposed Person)</b>			
By direct shares	<choose option>	<number>	% of shares
By direct voting rights	<choose option>	<number>	
By indirect shares	<choose option>	1 000 000 000	% of indirect shares 58%
By indirect voting rights	<choose option>	<number>	
Total shares		1 000 000 000	% of shares 58%
Total voting rights			
Number of intermediary entities	<number>		
<b>3.2 Has the right to exercise influence or control over the company by other means</b>	<choose option>	Receives not less than 5% of Company's annual revenue (irrespective of the level of control or ownership)	
	<choose option>	holds the right to appoint or dismiss executive of the company	
	<choose option>	holds the right to exercise influence and control over the management and operations of the company or has the capacity to predetermine decisions through other means, including and	
	<choose option>	Other means	<Explanation of how ownership is exercised >
<b>3.3 Acquisition date</b> 2018-05-19			
<i>If the person holds several stakes through different intermediary companies, insert extra rows to list the indirect interest and through what legal owner.</i>			
<b>3.4. Intermediary Legal Entity with Indirect Shareholding (if indirect, through what legal owner and intermediary company)</b>			
Legal name of intermediate company	SKY NIGHT LIMITED		
Unique identification number	85 494		
Country of registration	British Virgin Islands		
Legal Entity operates for beneficial owner :	Both directly or indirectly		
<i>(add rows as necessary)</i>			

## (iii) Link to BO disclosure of “CNOOC LTD” Gini Energy Ltd:

**4. MAJOR SHAREHOLDERS**

The following table sets forth information regarding the ownership of our outstanding shares by major shareholders as of March 31, 2018.

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[Table of Contents](#)

Shareholder	Number of Shares Owned	Percentage
CNOOC <sup>(1)</sup>	28,772,727,273	64.44%

<sup>1)</sup> CNOOC owns our shares indirectly through its wholly owned subsidiaries, CNOOC (BVI) Limited and Overseas Oil & Gas Corporation, Ltd.

Our major shareholder listed above does not have voting rights different from our other shareholders. Except as set forth in the above table, we are not aware of any shareholders that hold more than 5% of our shares. Except as disclosed above, we are not aware of any significant changes in the percentage ownership of our major shareholder over the course of the past three years. To our knowledge, no arrangements are currently in place that could lead to a change of control of our company.

As of March 1, 2018, 10,429,785 ADSs, representing approximately 2.3% of our then outstanding shares, were held of record in the form of ADSs. At such date, the number of registered ADS holders in the United States was 59.

**3. RELATED PARTY TRANSACTIONS**

**Overview**

We regularly enter into transactions with related parties, including CNOOC and its associates. Since CNOOC indirectly owns an aggregate of approximately 64.44% of our outstanding shares, some of these transactions constitute connected transactions under the Hong Kong Stock Exchange Listing Rules, and are regulated by the Hong Kong Stock Exchange.

Apart from transactions with CNOOC and its associates, we have transactions with other state-owned enterprises, including, but not limited to, the following:

- Sales and purchase of goods and services;
- Purchases of assets, goods and services;
- Leases of assets; and
- Bank deposits.

Source :

[https://www.sec.gov/edgar/search/#/q=beneficial%2520ownership&dateRange=1y&ciks=0001095595&entityName=CNOOC%2520LTD%2520\(CEO\)%2520\(CIK%25200001095595\)](https://www.sec.gov/edgar/search/#/q=beneficial%2520ownership&dateRange=1y&ciks=0001095595&entityName=CNOOC%2520LTD%2520(CEO)%2520(CIK%25200001095595))

3. Newcrest PNG 2 Limited

(i) Company ownership map



**(ii) Beneficial Ownership Declaration**



**BENEFICIAL OWNERSHIP DECLARATION**

The form has 2 parts (worksheets):

Part A covers the company identification details

Part 2 is a beneficial ownership declaration form to be filled in for each beneficial owner. If there is more than one beneficial owner, please complete one worksheet per beneficial owner

It is required that fields marked in orange are completed by the company

It is optional that fields marked in green are completed by the company, unless the MSG decides otherwise. The MSG should decide on this and adjust the colours accordingly prior to distributing the template.

For questions on filling in this form, please contact [Name or Office of form administrator, email / phone number]

The template includes comment boxes that provide guidance on how to complete each section. These comment boxes should be removed by the company prior to submitting the declaration form.

**Company filing the declaration:**

Newcrest PNG 2 Limited (holder of 50% interest in Wafi Golpu Joint Venture)	
Reference to license(s) held by company	EL 440 and EL 1105

**Status**

Number of identified Beneficial Owners	<insert number>
Data on the Beneficial Owner was collected and was reported in sheet DF 3	<choose option>
The company is exempt from communicating data on Beneficial Owners (Publicly listed company or more than 95% owned subsidiaries of publicly listed company), the details of which is disclosed in sheet DF 2	YES
The shareholder holding more than 95% is a Governing authority, bodies, agencies or legal persons governed by public national laws, the details of which is disclosed in sheet DF 2	<choose option>
Company has no Beneficial Owner	<choose option>
Sufficient data could not be collected to identify the Beneficial Owners	<text>

**Limitation**

If sufficient data could not be collected to identify the Beneficial Owners, please explain the reasons:

**Attestation**

I, the undersigned, for and on behalf of the reporting entity, confirm that all information provided above and in the attached beneficial ownership declaration(s) is accurate and complete. If the attestation needs to be filled in by a person with a certain level of seniority within the organisation, please indicate this in this section.

Date

First name, Last name

Position

Telephone number

Email address

Signature

2020-11-17
Craig Jones
Director
61395225208
<a href="mailto:craig.jones@newcrest.com.au">craig.jones@newcrest.com.au</a>

Please find attached the following supporting documents verifying the accuracy of the beneficial ownership information submitted:

<text>
<text>



## A. Company

1. Company data	Entry	Comments
Registered name of the company (including legal form of legal entity)	Newcrest PNG 2 Limited (company)	
Country of registration	Papua New Guinea	
Unique identification number (i.e. registration number)	Co. No.1-62605	
Registration authority (name of Ministry or agency that issued the unique identification number)	Investment Promotion Authority (Companies Office)	
Contact address (registered office)	2nd Floor, Brian Bell Plaza, Turumu Street, Boroko, NCD 111, PNG	
Contact address (Address for services)	As above	
<b>2.State Participation</b>		
<i>If the company is (100%) state owned:</i>		
Company is a state-owned (state shareholding) company	<choose option>	
State title 1	<text>	
State title 2	<text>	
Equity participation	<percentage>	
<b>3. Publicly-listed Company</b>		
3.1 Company is a Publicly listed entity	Yes	
Stock Exchange Name	<text>	
Legal Entity Identifier (LEI)	<identifier>	
Link to stock exchange documents (must include the link to BO disclosure)	<URL>	
3.2 Company is a wholly owned subsidiary of publicly listed entity	Yes	
Full legal name of listed entity	Newcrest Mining Limited	
Stock Exchange Name	Australian Securities Exchange	
Legal Entity Identifier (LEI)	NCM	
Link to stock exchange documents (must include the link to BO disclosure)	<a href="http://www.pngx.com.pg/?s=ncm">market/announcements</a>	
Stock Exchange Name	PNGX Markets Limited	
Legal Entity Identifier (LEI)	NCM	
Link to stock exchange documents (must include the link to BO disclosure)	<a href="http://www.pngx.com.pg/?s=ncm">http://www.pngx.com.pg/?s=ncm</a>	
Stock Exchange Name	Toronto Stock Exchange	
Legal Entity Identifier (LEI)	NCM	
Link to stock exchange documents (must include the link to BO disclosure)	<a href="https://www.sedar.com/search/search_form_pc_en.htm">https://www.sedar.com/search/search_form_pc_en.htm</a>	
<b>4. Legal ownership</b>		
Full name of direct shareholder(s) (i.e. legal owners of company)	<text>	
% interest	<percentage>	
Is this shareholder a natural person (NP), a legal person (LP) or a state entity (S)	Legal Person (LP)	
Country of registration (or nationality of a natural person)	<text>	
Unique identification number (i.e. registration number) (if LP)	<number>	
Publicly listed entity (for LP)	Yes	
Stock Exchange Name (if Publicly-listed entity)	<text>	
Legal Entity Identifier (LEI) (if Publicly-listed entity)	<identifier>	
Link to stock Exchange documents (must include the link to BO disclosure)	<URL>	
<i>(Please add more rows below if there are more than one direct shareholder)</i>		

(iii) Link to BO disclosure of Newcrest Mining Limited:

<https://www.sedar.com/DisplayCompanyDocuments.do?lang=EN&issuerNo=00032889>

**4. Lihir Gold Limited**

**(i) Company ownership map**



(ii) Beneficial Ownership Declaration



**BENEFICIAL OWNERSHIP DECLARATION**

The form has 2 parts (worksheets):

Part A covers the company identification details

Part 2 is a beneficial ownership declaration form to be filled in for each beneficial owner. If there is more than one beneficial owner, please complete one worksheet per beneficial owner

It is required that fields marked in orange are completed by the company

It is optional that fields marked in green are completed by the company, unless the MSG decides otherwise. The MSG should decide on this and adjust the colours accordingly prior to distributing the template.

For questions on filing in this form, please contact [Name or Office of form administrator, email / phone number]

The template includes comment boxes that provide guidance on how to complete each section. These comment boxes should be removed by the company prior to submitting the declaration form.

**Company filing the declaration:**

Lihir Gold Limited	
Reference to license(s) held by company	EL485, ML125, ML126, LMP34, LMP35, LMP38, LMP39, LMP40, ME71, ME72, ME73 and SMLG

**Status**

Number of Identified Beneficial Owners	<insert number>
Data on the Beneficial Owner was collected and was reported in sheet DF 3	<choose option>
The company is exempt from communicating data on Beneficial Owners (Publicly listed company or more than 95% owned subsidiaries of publicly listed company), the details of which is disclosed in sheet DF 2	YES
The shareholder holding more than 95% is a Governing authority, bodies, agencies or legal persons governed by public national laws, the details of which is disclosed in sheet DF 2	<choose option>
Company has no Beneficial Owner	<choose option>
Sufficient data could not be collected to identify the Beneficial Owners	<state>

**Limitation**

If sufficient data could not be collected to identify the Beneficial Owners, please explain the reasons:

**Attestation**

I, the undersigned, for and on behalf of the reporting entity, confirm that all information provided above and in the attached beneficial ownership declaration(s) is accurate and complete. If the attestation needs to be filled in by a person with a certain level of seniority within the organization, please indicate this in this section.

Date	2020-11-17
First name, Last name	Craig Jones
Position	Director
Telephone number	61395225208
Email address	<a href="mailto:craig_jones@newcrest.com.au">craig_jones@newcrest.com.au</a>
Signature	

Please find attached the following supporting documents verifying the accuracy of the beneficial ownership information submitted:

<state>

<state>





## A. Company

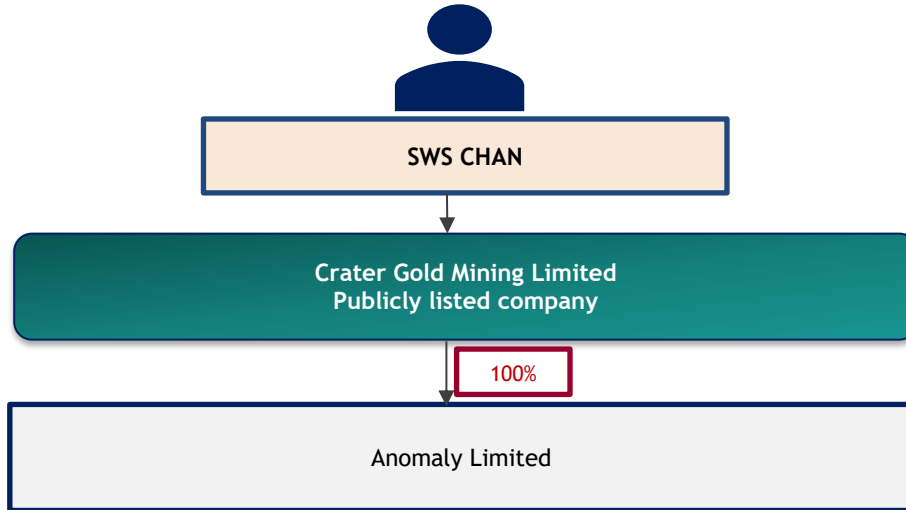
1. Company data	Entry	Comments
Registered name of the company (including legal form of legal entity)	Lihir Gold Limited(company)	
Country of registration	Papua New Guinea	
Unique identification number (i.e. registration number)	Co. No.1-23423	
Registration authority (name of Ministry or agency that issued the unique identification number)	Investment Promotion Authority (Companies Office)	
Contact address (registered office)	2nd Floor, Brian Bell Plaza, Turumu Street, Boroko, NCD 111, PNG	
Contact address (Address for services)	As above	
<b>2.State Participation</b>		
<i>If the company is (100%) state owned:</i>		
Company is a state-owned (state shareholding) company	<choose option>	
State title 1	<text>	
State title 2	<text>	
Equity participation	<percentage>	
<b>3. Publicly-listed Company</b>		
3.1 Company is a Publicly listed entity	Yes	
Stock Exchange Name	<text>	
Legal Entity Identifier (LEI)	<identifier>	
Link to stock exchange documents (must include the link to BO disclosure)	<URL>	
3.2 Company is a wholly owned subsidiary of publicly listed entity	Yes	
Full legal name of listed entity	Newcrest Mining Limited	
Stock Exchange Name	Australian Securities Exchange	
Legal Entity Identifier (LEI)	NCM	
Link to stock exchange documents (must include the link to BO disclosure)	<a href="#">market/announcements</a>	
Stock Exchange Name	PNGX Markets Limited	
Legal Entity Identifier (LEI)	NCM	
Link to stock exchange documents (must include the link to BO disclosure)	<a href="http://www.pngx.com.pg/?s=ncm">http://www.pngx.com.pg/?s=ncm</a>	
Stock Exchange Name	Toronto Stock Exchange	
Legal Entity Identifier (LEI)	NCM	
Link to stock exchange documents (must include the link to BO disclosure)	<a href="https://www.sedar.com/search/search_form_pc_en.htm">https://www.sedar.com/search/search_form_pc_en.htm</a>	
<b>4. Legal ownership</b>		
Full name of direct shareholder(s) (i.e. legal owners of company)	<text>	
% interest	<percentage>	
Is this shareholder a natural person (NP), a legal person (LP) or a state entity (S)	Legal Person (LP)	
Country of registration (or nationality of a natural person)	<text>	
Unique identification number (i.e. registration number) (if LP)	<number>	
Publicly listed entity (for LP)	Yes	
Stock Exchange Name (if Publicly-listed entity)	<text>	
Legal Entity Identifier (LEI) (if Publicly-listed entity)	<identifier>	
Link to stock Exchange documents (must include the link to BO disclosure)	<URL>	
<i>(Please add more rows below if there are more than one direct shareholder)</i>		

(iii) Link to BO disclosure of Newcrest Mining Limited:

<https://www.sedar.com/DisplayCompanyDocuments.do?lang=EN&issuerNo=00032889>

5. Anomaly Ltd

(i) Company ownership map



(ii) Beneficial Ownership Declaration



## BENEFICIAL OWNERSHIP DECLARATION

The form has 2 parts (worksheets):

Part A covers the company identification details

Part 2 is a beneficial ownership declaration form to be filled in for each beneficial owner. If there is more than one beneficial owner, please complete one worksheet per beneficial owner

It is required that fields marked in orange are completed by the company

It is optional that fields marked in green are completed by the company, unless the MSG decides otherwise. The MSG should decide on this and adjust the colours accordingly prior to distributing the template.

For questions on filling in this form, please contact [Name or Office of form administrator, email / phone number]

The template includes comment boxes that provide guidance on how to complete each section. These comment boxes should be removed by the company prior to submitting the declaration form.

### Company filing the declaration:

Anomaly Limited	
Reference to license(s) held by company	MLS10, EL115

### Status

Number of identified Beneficial Owners	1
Data on the Beneficial Owner was collected and was reported in sheet DF 3	No
The company is exempt from communicating data on Beneficial Owners (Publicly listed company or more than 95% owned subsidiaries of publicly listed company ), the details of which is disclosed in sheet DF 2	Yes
The shareholder holding more than 95% is a Governing authority, bodies, agencies or legal persons governed by public national laws, the details of which is disclosed in sheet DF 2	No
Company has no Beneficial Owner	No
Sufficient data could not be collected to identify the Beneficial Owners	No

### Limitation

If sufficient data could not be collected to identify the Beneficial Owners, please explain the reasons:

### Attestation

I, the undersigned, for and on behalf of the reporting entity, confirm that all information provided above and in the attached beneficial ownership declaration(s) is accurate and complete. If the attestation needs to be filled in by a person with a certain level of seniority within the organisation, please indicate this in this section.

Date	2020-11-05
First name, Last name	Matthew O'Kane
Position	CFO
Telephone number	61478782346
Email address	matthew@azargaresources.com
Signature	

Please find attached the following supporting documents verifying the accuracy of the beneficial ownership information submitted:

<text>  
<text>



## A. Company

1. Company data	Entry	Comments
Registered name of the company (including legal form of legal entity)	Anomaly Limited	
Country of registration	Papua New Guinea	
Unique identification number (i.e. registration number)	1-56947	
Registration authority (name of Ministry or agency that issued the unique identification number)	Registrar of Companies, Papua New Guinea	
Contact address (registered office)	Bell Plaza, Turumu Street, NCD, PNG	
Contact address (Address for services)	P.O. Box 6861, Boroko, NCD, PNG	
<b>2.State Participation</b>		
<i>If the company is (100%) state owned:</i>		
Company is a state-owned (state shareholding) company	No	
State title 1	<text>	
State title 2	<text>	
Equity participation	<percentage>	
<b>3. Publicly-listed Company</b>		
3.1 Company is a Publicly listed entity	No	
Stock Exchange Name		
Legal Entity Identifier (LEI)		
Link to stock exchange documents (must include the link to BO disclosure)		
3.2 Company is a wholly owned subsidiary of publicly listed entity	Yes	
Full legal name of listed entity	Crater Gold Mining Limited	
Stock Exchange Name	Australian Securities Exchange	
Legal Entity Identifier (LEI)	Crater Gold Mining Limited - ASX.CGN	
Link to stock exchange documents (must include the link to BO disclosure)	<a href="https://www2.asx.com.au/markets/trade-our-cash">https://www2.asx.com.au/markets/trade-our-cash</a>	
<b>4. Legal ownership</b>		
Full name of direct shareholder(s) (i.e. legal owners of company)	Crater Gold Mining Limited - ASX.CGN	
% interest	100	
Is this shareholder a natural person (NP), a legal person (LP) or a state entity (S)?	Legal Person (LP)	
Country of registration (or nationality of a natural person)	AU	
Unique identification number (i.e. registration number) (if LP)	67519779	
Publicly listed entity (for LP)	Yes	
Stock Exchange Name (if Publicly-listed entity)	Crater Gold Mining Limited - ASX.CGN	
Legal Entity Identifier (LEI) (if Publicly-listed entity)	67519779	
Link to stock Exchange documents (must include the link to BO disclosure)	<a href="http://www.cratergold.com.au/IRM/content/defa">http://www.cratergold.com.au/IRM/content/defa</a>	
<i>(Please add more rows below if there are more than one direct shareholder)</i>		

## (iii) Link to BO disclosure of Crater Gold Mining Limited:

Document Dated 20 September 2020

“Annual report for shareholders”

<https://www2.asx.com.au/markets/trade-our-cash-market/announcements>**S W S Chan BA** (Non-Executive Chairman), age 71

Mr Chan has been a Director of the Company since 29 January 2013 and was appointed as Non-Executive Chairman on 11 March 2013.

Mr Chan is a director and the controller of Freefire Technology Limited (“Freefire”), the major shareholder in the Company.

Mr Chan received a Bachelor’s degree from the University of Manchester, UK in 1970 and qualified as a chartered accountant in 1973. He was the Company secretary of Yangtzekiang Garment Limited from 1974 to 1988 and has been a Director of Yangtzekiang Garment Limited since 1977. Mr Chan was appointed the Managing Director of YGM Trading Limited from 1987 to 2006 and the Chief Executive Officer of YGM Trading Limited from 2006 to 2010. He has been the Vice Chairman of the board of YGM Trading Limited since 2010. Mr Chan is also on the board of Yangtzekiang Garment Limited.

Mr Chan was formerly a Director of Hang Ten Group Holdings Limited (listed in Hong Kong) from January 2003 to March 2012.

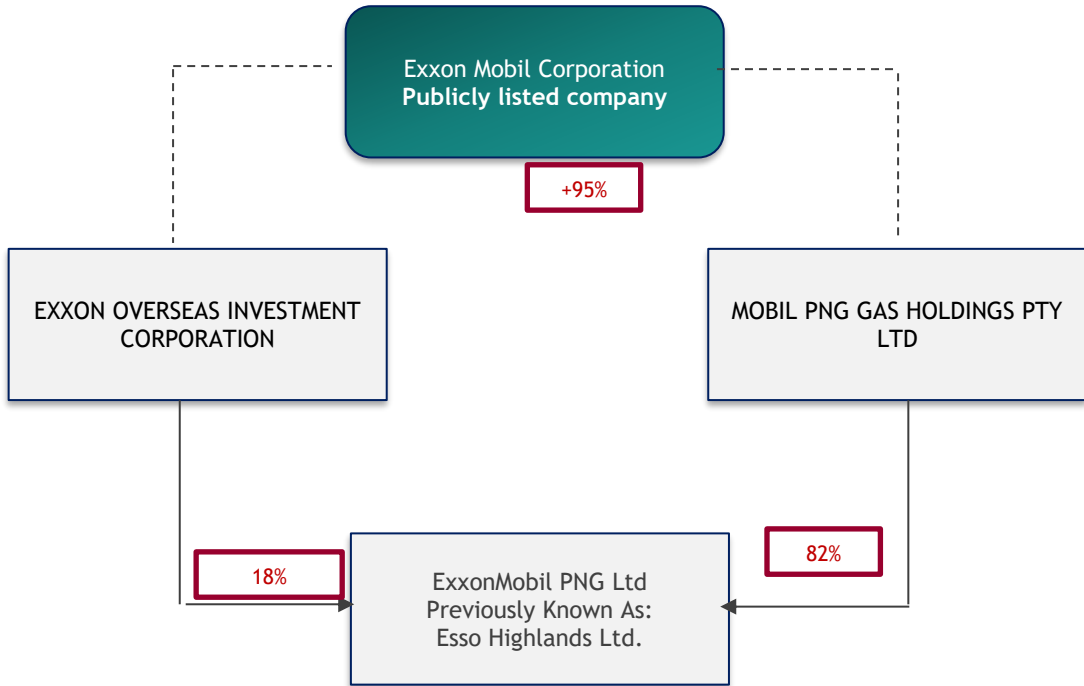
As at the date of this report, Mr Chan has a beneficial interest of 1,044,953,183 ordinary shares in the Company.

Top 20 Holders of Ordinary Shares		
Name	Number of shares	% holding
Freefire Technology Ltd	1,040,558,539	84.77%
China New Economy Fund Ltd	35,000,000	2.85%
HSBC Custody Nominees (Australia) Limited	20,684,022	1.69%
Mr Paul Thomas McGreal	10,000,000	0.81%
Mr Norman Colburn Mayne <N C Mayne Family Fund A/C>	6,030,000	0.49%
BNP Paribas Nominees Pty Ltd <IB AU Noms Retail client DRP>	4,388,864	0.36%
Mr Graham John Bailey & Mrs Annette Maree Bailey <Bailey Super Fund A/C>	4,375,000	0.36%
Ms Shiyang Yang	4,000,000	0.33%
Mr David Mingorance	3,600,000	0.29%
Graham Bailey Earthmoving Pty Ltd	3,125,000	0.25%
J P Morgan Nominees Australia Limited	2,980,228	0.24%
Mr Fouad Abdo	2,937,941	0.24%
Mr Joe Holloway	2,643,524	0.22%
One Managed Investment Funds Limited <Technical Investing Absolute Return A/C>	2,160,637	0.18%
Mr Stephen Charles Lindsay	1,897,002	0.15%
Bloom Star Investment Limited	1,775,649	0.14%
Desmond Tak Yan Sun	1,750,000	0.14%
Kin Keung Lee	1,750,000	0.14%
Lennard Drilling Pty Ltd	1,739,374	0.14%
Mr Brad Anthony Vaughan	1,687,290	0.14%
<b>Grand Total</b>	<b>1,153,083,070</b>	<b>93.93%</b>

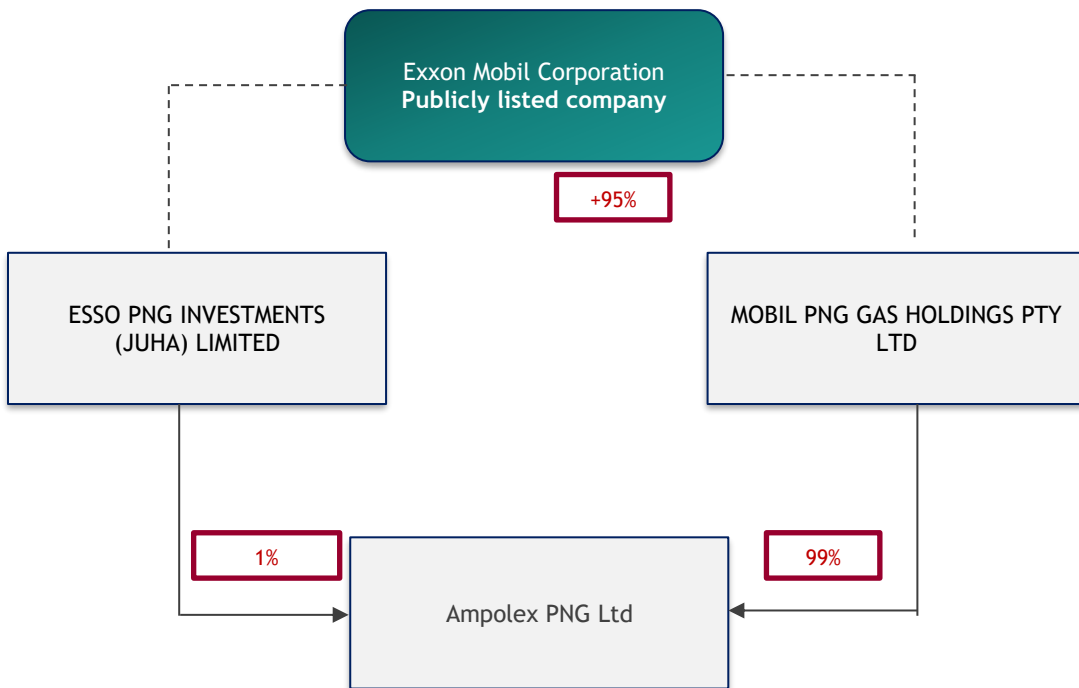
**6. ExxonMobil PNG Ltd & Subsidiary**

**(i) Company ownership**

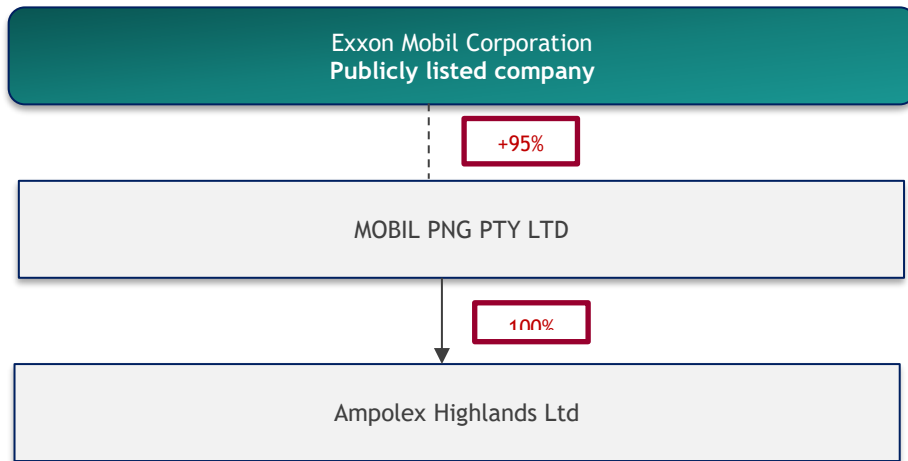
**ExxonMobil PNG Ltd**



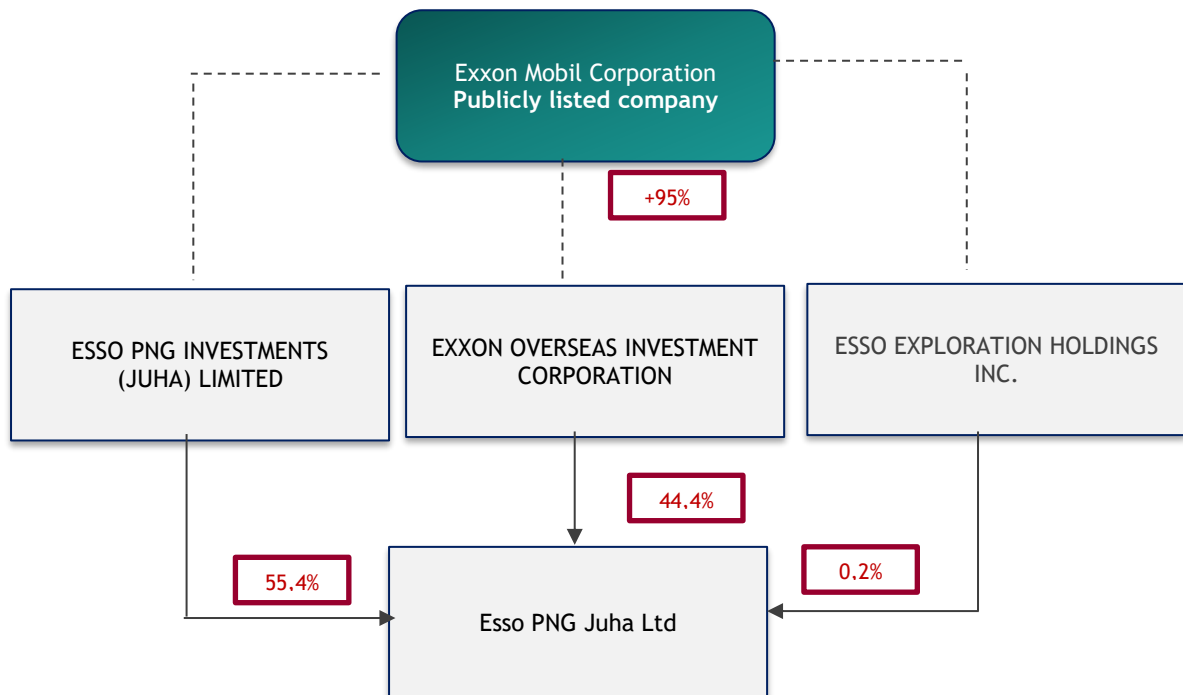
**Ampolex (PNG) Ltd**



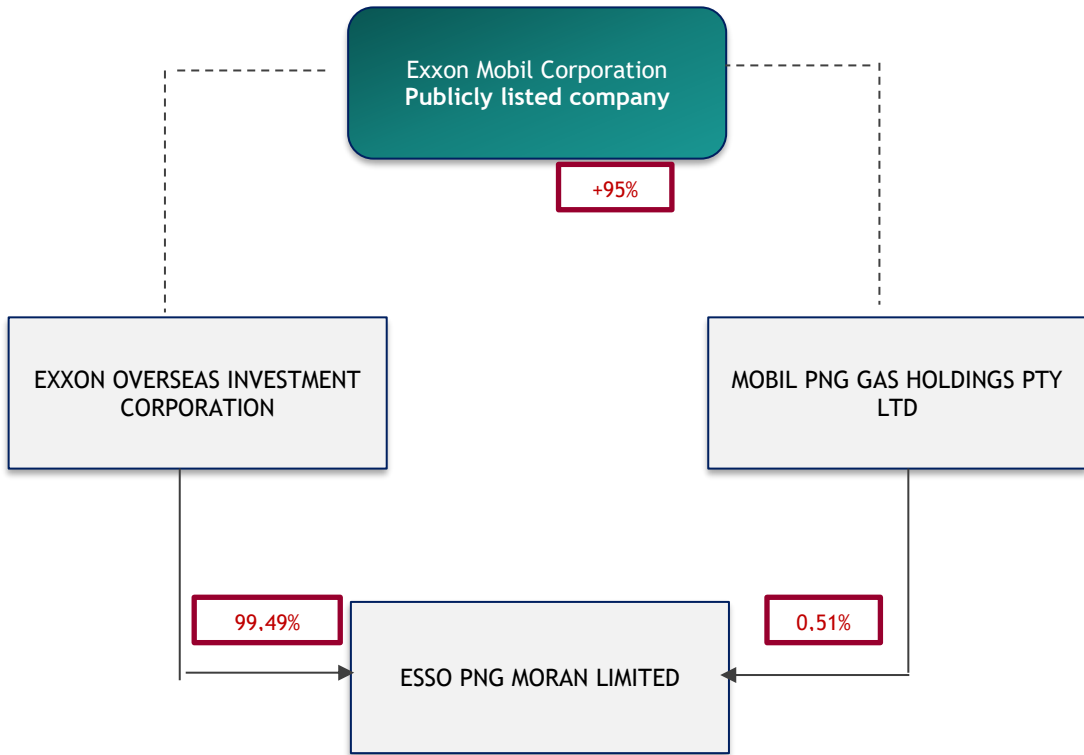
Ampolex Highlands Ltd



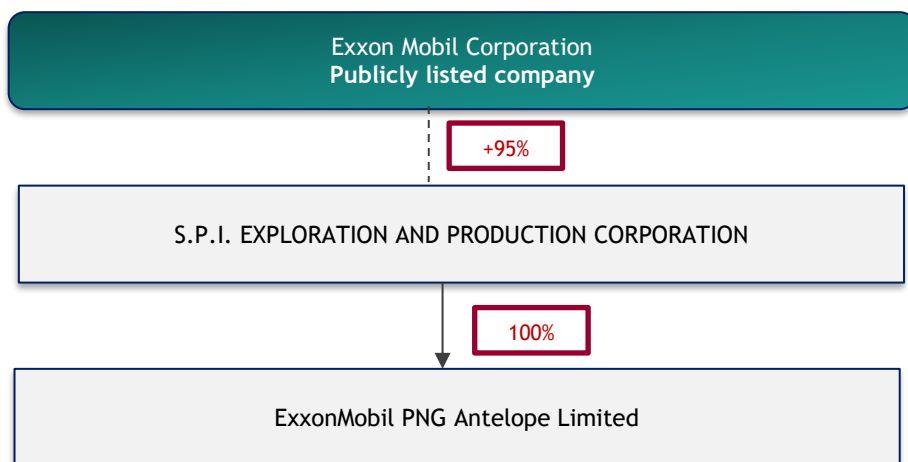
Esso PNG Juha Ltd



Esso PNG Moran Ltd

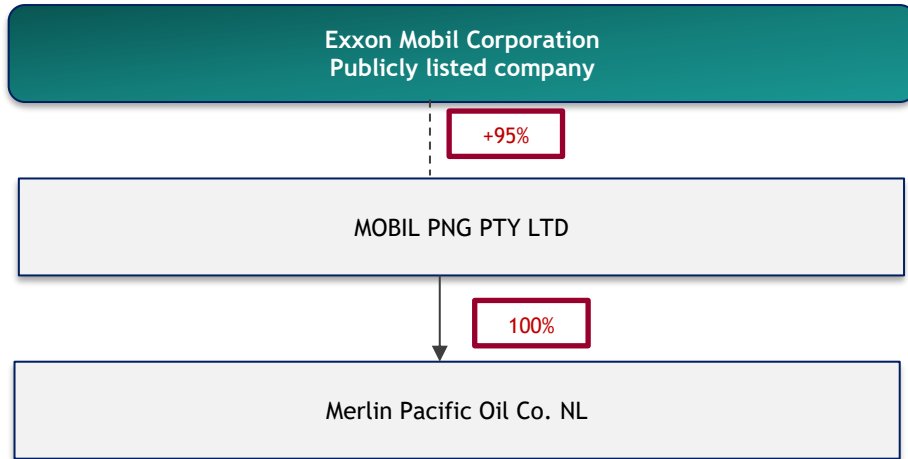


ExxonMobil PNG Antelope Limited

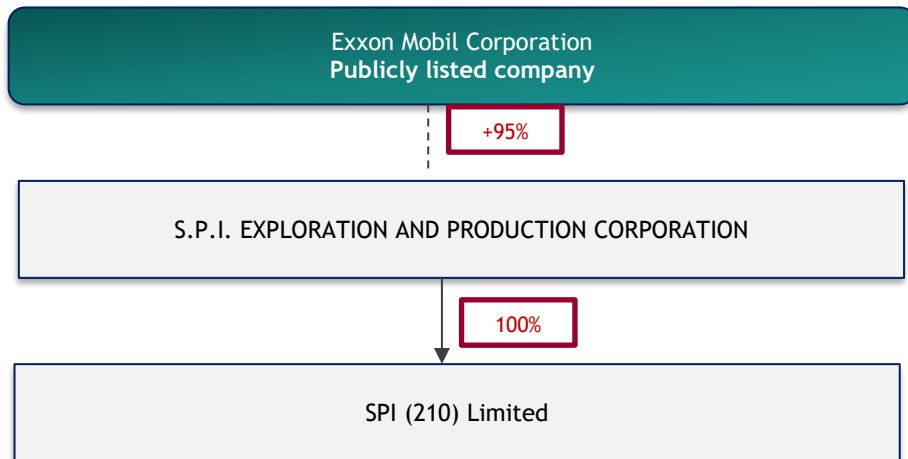


Merlin Pacific Oil Co. NL

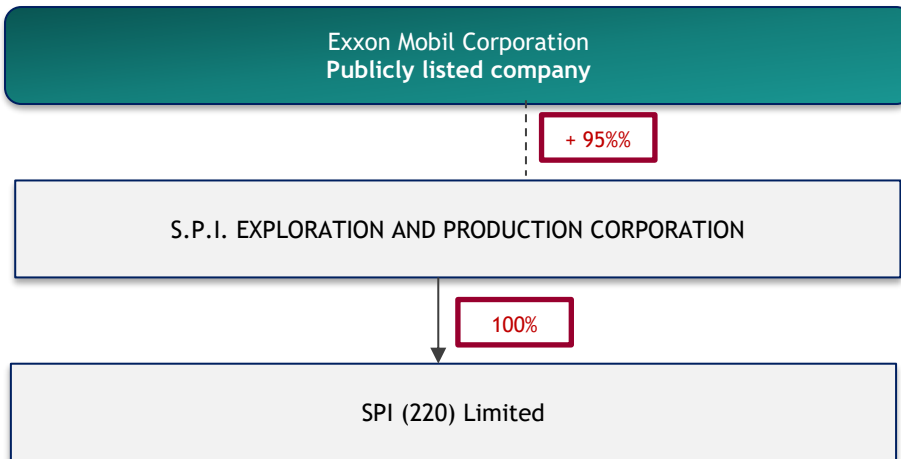




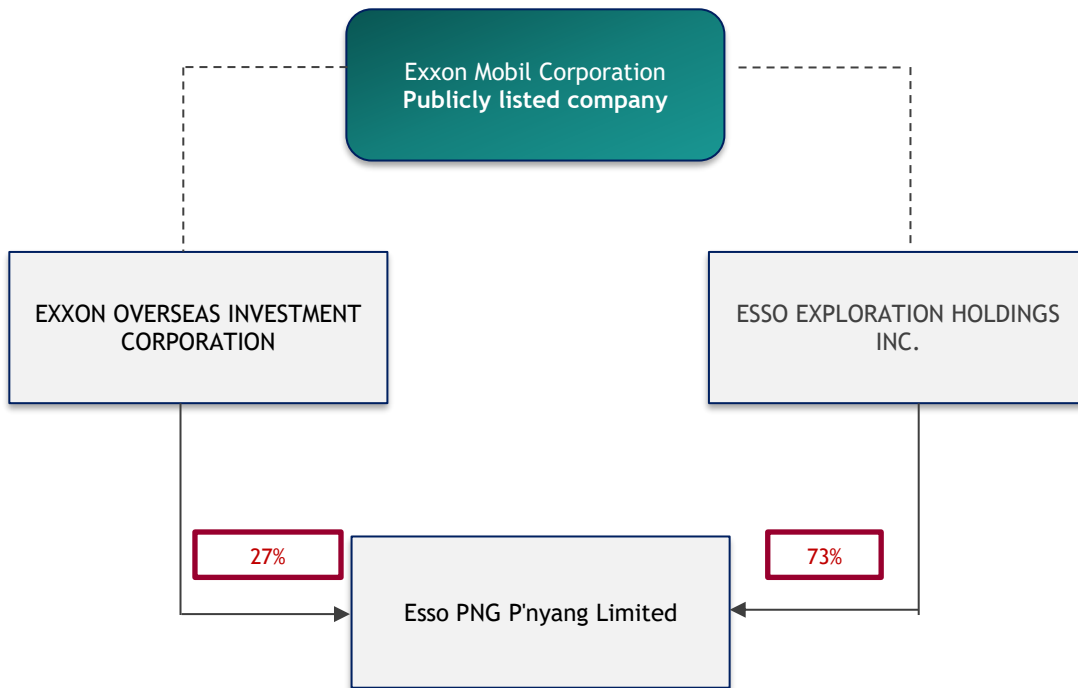
SPI (210) Limited



SPI (220) Limited



Esso PNG P'nyang Limited



## (ii) Beneficial Ownership Declaration



### BENEFICIAL OWNERSHIP DECLARATION

The form has 2 parts (worksheets):

Part A covers the company identification details

Part 2 is a beneficial ownership declaration form to be filled in for each beneficial owner. If there is more than one beneficial owner, please complete one worksheet per beneficial owner

It is required that fields marked in orange are completed by the company

It is optional that fields marked in green are completed by the company, unless the MSG decides otherwise. The MSG should decide on this and adjust the colours accordingly prior to distributing the template.

For questions on filling in this form, please contact [Name or Office of form administrator, email / phone number]

The template includes comment boxes that provide guidance on how to complete each section. These comment boxes should be removed by the company prior to submitting the declaration form.

#### Company filing the declaration:

Esso/Mobil Upstream Companies	Esso/Mobil PNG Limited, Esso PNG Subs Limited, Ampolite (Papua New Guinea) Limited, Ampolite (PNG Petroleum), Inc, Ampolite (Highland) Limited, Merin Pacific Oil Company Limited, Esso PNG Moran Limited, Esso PNG F'Njagid Limited, InterOil Shipping Pte. Ltd, InterOil Corporate PNG Ltd, Esso/Mobil PNG Amalgam Limited, SPI (210) Limited, SPI (220) Limited
Reference to license(s) held by company	

#### Status

Number of Identified Beneficial Owners	N/A	
Date on the Beneficial Owner was collected and was reported in sheet DP 8	checkboxes optional	
The company is exempt from communicating data on Beneficial Owners (Publicly listed company or more than 95% owned subsidiaries of publicly listed company), the details of which is disclosed in sheet DP 2	Yes	All the companies included for EITI reporting are 100% owned (indirectly) by Esso/Mobil Corporation which is a publicly listed company on the New York Stock Exchange
The shareholder holding more than 95% is a Governing authority, body, agencies or legal persons governed by public national laws, the details of which is disclosed in sheet DP 2	checkboxes optional	
Company has no Beneficial Owners	checkboxes optional	
Sufficient data could not be collected to identify the Beneficial Owners	checkboxes	

#### Limitation

If sufficient data could not be collected to identify the Beneficial Owners, please explain the reasons.

#### Attestation

I, the undersigned, for and on behalf of the reporting entity, confirm that all information provided above and in the attached beneficial ownership declaration(s) is accurate and complete. If the attestation needs to be filled in by a person with a certain level of seniority within the organisation, please indicate this in this section.

Date	2016-10-26
First name, last name	Thomas Clark
Position	Director & Controller
Telephone number	6753 4199
Email address	thomas.c.clark@esso.com.pg
Signature	Scanned copy signed

Please find attached the following supporting documents verifying the accuracy of the beneficial ownership information submitted.

Sheet:	
Sheet:	



**A. Company**

1. Company data	Entry	Comments
Registered name of the company (including legal form of legal entity)	<legal name> <legal form>	
Country of registration	<country>	
Unique identification number (i.e. registration number)	<number>	
Registration authority (name of Ministry or agency that issued the unique identification number)	<text>	
Contact address (registered office)	<address>	
Contact address (Address for services)	<address>	
<b>2.State Participation</b>		
<i>If the company is (100%) state owned:</i>		
Company is a state-owned (state shareholding) company	<choose option>	
State title 1	<text>	
State title 2	<text>	
Equity participation	<percentage>	
<b>3. Publicly-listed Company</b>		
<b>3.1 Company is a Publicly listed entity</b>	<choose option>	
Stock Exchange Name	<text>	
Legal Entity Identifier (LEI)	<identifier>	
Link to stock exchange documents (must include the link to BO disclosure)	<URL>	
<b>3.2 Company is a wholly owned subsidiary of publicly listed entity</b>	Yes	
Full legal name of listed entity	Exxon Mobil Corporation	
Stock Exchange Name	New York Stock Exchange	
Legal Entity Identifier (LEI)	29AH8GDM7S706ZVMDC91	
Link to stock exchange documents (must include the link to BO disclosure)	https://www.sec.gov/cgi-bin/browse	
<b>4. Legal ownership</b>		
Full name of direct shareholder(s) (i.e. legal owners of company)	<text>	
% interest	<percentage>	
Is this shareholder a natural person (NP), a legal person (LP) or a state entity (SE)?	Legal Person (LP)	
Country of registration (or nationality of a natural person)	<text>	
Unique identification number (i.e. registration number) (if LP)	<number>	
Publicly listed entity (for LP)	Yes	
Stock Exchange Name (if Publicly-listed entity)	<text>	
Legal Entity Identifier (LEI) (if Publicly-listed entity)	<identifier>	
Link to stock Exchange documents (must include the link to BO disclosure)	<URL>	
<i>(Please add more rows below if there are more than one direct shareholder)</i>		

**(iii) Link to BO disclosure of Exxon Mobil Corporation**

Document Dated 20 December 2019 “SC 13G/A 1 tv01546 ExxonMobilcorp.htm SCHEDULE 3G/A”

<https://www.sec.gov/Archives/edgar/data/0000102909/000110465920018249/tv01546-exxonmobilcorp.htm>

Comments:

Item 5 - Ownership of Five Percent or Less of a Class:

If this statement is being filed to report the fact that as of the date hereof the reporting person has ceased to be the beneficial owner of more than 5 percent of the class of securities, check the following

Item 6 - Ownership of More Than Five Percent on Behalf of Another Person:

Not applicable

**7. Santos Hides Limited**

**(i) Company ownership map**



(ii) Beneficial Ownership Declaration



**BENEFICIAL OWNERSHIP DECLARATION**

The form has 2 parts (worksheets):

Part A covers the company identification details

Part 2 is a beneficial ownership declaration form to be filled in for each beneficial owner. If there is more than one beneficial owner, please complete one worksheet per beneficial owner

It is required that fields marked in orange are completed by the company

It is optional that fields marked in green are completed by the company, unless the MSG decides otherwise. The MSG should decide on this and adjust the colours accordingly prior to distributing the template.

For questions on filling in this form, please contact [Name or Office of form administrator, email / phone number]

The template includes comment boxes that provide guidance on how to complete each section. These comment boxes should be removed by the company prior to submitting the declaration form.

**Company filing the declaration:**

Santos Hides Limited
Reference to license(s) held by company

**Status**

Number of Identified Beneficial Owners	N/A
Data on the Beneficial Owner was collected and was reported in sheet DF 3	No
The company is exempt from communicating data on Beneficial Owners (Publicly listed company or more than 95% owned subsidiaries of publicly listed company), the details of which is disclosed in sheet DF 2	Yes
The shareholder holding more than 95% is a Governing authority, bodies, agencies or legal persons governed by public national laws, the details of which is disclosed in sheet DF 2	No
Company has no Beneficial Owner	No
Sufficient data could not be collected to identify the Beneficial Owners	No

**Limitation**

*If sufficient data could not be collected to identify the Beneficial Owners, please explain the reasons:*

**Attestation**

I, the undersigned, for and on behalf of the reporting entity, confirm that all information provided above and in the attached beneficial ownership declaration(s) is accurate and complete. If the attestation needs to be filled in by a person with a certain level of seniority within the organisation, please indicate this in this section.

Date	2020-11-18
First name, Last name	Angeline Sariman
Position	Director
Telephone number	325 0011
Email address	angelineleahy@email.com
Signature	

Please find attached the following supporting documents verifying the accuracy of the beneficial ownership information submitted:

<text>
<text>



**A. Company**

	Entry	Comments
<b>1. Company data</b>		
Registered name of the company (including legal form of legal entity)	Santos Hides Limited	
Country of registration	Papua New Guinea	
Unique identification number (i.e. registration number)	1-30340	
Registration authority (name of Ministry or agency that issued the unique identification number)	Investment Promotion Authority	
Contact address (registered office)	Haus, Section 30, Allotment 38, Cameron Road, Hohola	
Contact address (Address for services)	Haus, Section 30, Allotment 38, Cameron Road, Hohola	
<b>2. State Participation</b>		
<i>If the company is (100%) state owned:</i>		
Company is a state-owned (state shareholding) company	No	
State title 1	<text>	
State title 2	<text>	
Equity participation	<percentage>	
<b>3. Publicly-listed Company</b>		
<b>3.1 Company is a Publicly listed entity</b>		
Company is a Publicly listed entity	No	
Stock Exchange Name	<text>	
Legal Entity Identifier (LEI)	<identifier>	
Link to stock exchange documents (must include the link to BO disclosure)	<URL>	
<b>3.2 Company is a wholly owned subsidiary of publicly listed entity</b>		
Company is a wholly owned subsidiary of publicly listed entity	Yes	
Full legal name of listed entity	Santos Limited	
Stock Exchange Name	Australian Securities Exchange (ASX)	
Legal Entity Identifier (LEI)	ACN 007 550 923	
Link to stock exchange documents (must include the link to BO disclosure)	<a href="https://www2.asx.com.au/markets/company/STO/">https://www2.asx.com.au/markets/company/STO/</a> <a href="https://www.santos.com/investors/">https://www.santos.com/investors/</a>	
<b>4. Legal ownership</b>		
Full name of direct shareholder(s) (i.e. legal owners of company)	N/A	
% interest	<percentage>	
Is this shareholder a natural person (NP), a legal person (LP) or a state entity (SE)?	Legal Person (LP)	
Country of registration (or nationality of a natural person)	<text>	
Unique identification number (i.e. registration number) (if LP)	<number>	
Publicly listed entity (for LP)	Yes	
Stock Exchange Name (if Publicly-listed entity)	<text>	
Legal Entity Identifier (LEI) (if Publicly-listed entity)	<identifier>	
Link to stock Exchange documents (must include the link to BO disclosure)	<URL>	
<i>(Please add more rows below if there are more than one direct shareholder)</i>		

(iii) Link to BO disclosure of Exxon Mobil Corporation

<https://www2.asx.com.au/markets/trade-our-cash-market/announcements>



**8. Santos P'nyang Limited**

**(i) Company ownership map**



(ii) Beneficial Ownership Declaration



**BENEFICIAL OWNERSHIP DECLARATION**

The form has 2 parts (worksheets):

Part A covers the company identification details

Part 2 is a beneficial ownership declaration form to be filled in for each beneficial owner. If there is more than one beneficial owner, please complete one worksheet per beneficial owner

It is required that fields marked in orange are completed by the company

It is optional that fields marked in green are completed by the company, unless the MSG decides otherwise. The MSG should decide on this and adjust the colours accordingly prior to distributing the template.

For questions on filling in this form, please contact [Name or Office of form administrator, email / phone number]

The template includes comment boxes that provide guidance on how to complete each section. These comment boxes should be removed by the company prior to submitting the declaration form.

**Company filing the declaration:**

Santos Pinyang Limited
Reference to license(s) held by company

**Status**

Number of identified Beneficial Owners	N/A
Data on the Beneficial Owner was collected and was reported in sheet DF 3	No
The company is exempt from communicating data on Beneficial Owners (Publicly listed company or more than 95% owned subsidiaries of publicly listed company ), the details of which is disclosed in sheet DF 2	Yes
The shareholder holding more than 95% is a Governing authority, bodies, agencies or legal persons governed by public national laws, the details of which is disclosed in sheet DF 2	No
Company has no Beneficial Owner	No
Sufficient data could not be collected to identify the Beneficial Owners	No

**Limitation**

*If sufficient data could not be collected to identify the Beneficial Owners, please explain the reasons:*

**Attestation**

I, the undersigned, for and on behalf of the reporting entity, confirm that all information provided above and in the attached beneficial ownership declaration(s) is accurate and complete. If the attestation needs to be filled in by a person with a certain level of seniority within the organisation, please indicate this in this section.

Date	2020-11-18
First name, Last name	Angeline Sariman
Position	Director
Telephone number	325 0011
Email address	angelineleahy@gmail.com
Signature	

Please find attached the following supporting documents verifying the accuracy of the beneficial ownership information submitted:

<text>
<text>



## A. Company

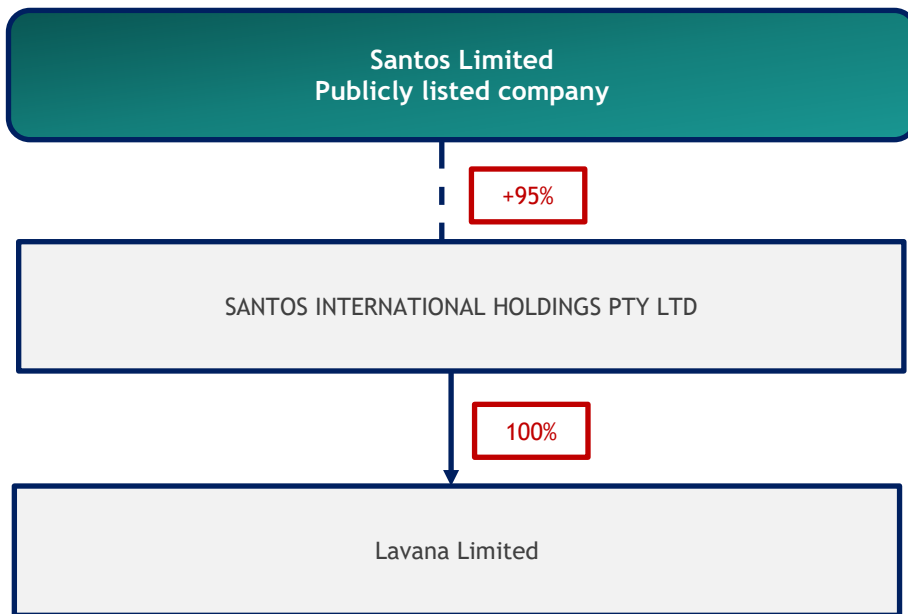
1. Company data	Entry	Comments
Registered name of the company (including legal form of legal entity)	Santos P'nyang Limited	
Country of registration	Papua New Guinea	
Unique identification number (i.e. registration number)	1-11440	
Registration authority (name of Ministry or agency that issued the unique identification number)	Investment Promotion Authority	
Contact address (registered office)	Haus, Section 30, Allotment 38, Cameron Road, Hohola	
Contact address (Address for services)	Haus, Section 30, Allotment 38, Cameron Road, Hohola	
<b>2.State Participation</b>		
<i>if the company is (100%) state owned:</i>		
Company is a state-owned (state shareholding) company	No	
State title 1	<text>	
State title 2	<text>	
Equity participation	<percentage>	
<b>3. Publicly-listed Company</b>		
<b>3.1 Company is a Publicly listed entity</b>	No	
Stock Exchange Name	<text>	
Legal Entity Identifier (LEI)	<identifier>	
Link to stock exchange documents (must include the link to BO disclosure)	<URL>	
<b>3.2 Company is a wholly owned subsidiary of publicly listed entity</b>	Yes	
Full legal name of listed entity	Santos Limited	
Stock Exchange Name	Australian Securities Exchange (ASX)	
Legal Entity Identifier (LEI)	ACN 007 550 923	
Link to stock exchange documents (must include the link to BO disclosure)	https://www2.asx.com.au/markets/company/STO; https://www.santos.com/investors/	
<b>4. Legal ownership</b>		
Full name of direct shareholder(s) (i.e. legal owners of company)	N/A	
% interest	<percentage>	
Is this shareholder a natural person (NP), a legal person (LP) or a state entity (S)?	Legal Person (LP)	
Country of registration (or nationality of a natural person)	<text>	
Unique identification number (i.e. registration number) (if LP)	<number>	
Publicly listed entity (for LP)	Yes	
Stock Exchange Name (if Publicly-listed entity)	<text>	
Legal Entity Identifier (LEI) (if Publicly-listed entity)	<identifier>	
Link to stock Exchange documents (must include the link to BO disclosure)	<URL>	
<i>(Please add more rows below if there are more than one direct shareholder)</i>		

(iii) Link to BO disclosure of Exxon Mobil Corporation

<https://www2.asx.com.au/markets/trade-our-cash-market/announcements>

9. Lavana Limited

(i) Company ownership map



**(ii) Beneficial Ownership Declaration**



**BENEFICIAL OWNERSHIP DECLARATION**

The form has 2 parts (worksheets):

Part A covers the company identification details

Part 2 is a beneficial ownership declaration form to be filled in for each beneficial owner. If there is more than one beneficial owner, please complete one worksheet per beneficial owner

It is required that fields marked in orange are completed by the company

It is optional that fields marked in green are completed by the company, unless the MSG decides otherwise. The MSG should decide on this and adjust the colours accordingly prior to distributing the template.

For questions on filling in this form, please contact [Name or Office of form administrator, email / phone number]

The template includes comment boxes that provide guidance on how to complete each section. These comment boxes should be removed by the company prior to submitting the declaration form.

**Company filing the declaration:**

Levene Limited
Reference to license(s) held by company

**Status**

Number of Identified Beneficial Owners	N/A
Data on the Beneficial Owner was collected and was reported in sheet DF 3	No
The company is exempt from communicating data on Beneficial Owners (Publicly listed company or more than 95% owned subsidiaries of publicly listed company), the details of which is disclosed in sheet DF 2	Yes
The shareholder holding more than 95% is a Governing authority, bodies, agencies or legal persons governed by public national laws, the details of which is disclosed in sheet DF 2	No
Company has no Beneficial Owner	No
Sufficient data could not be collected to identify the Beneficial Owners	No

**Limitation**

If sufficient data could not be collected to identify the Beneficial Owners, please explain the reasons:

**Attestation**

I, the undersigned, for and on behalf of the reporting entity, confirm that all information provided above and in the attached beneficial ownership declaration(s) is accurate and complete. If the attestation needs to be filled in by a person with a certain level of seniority within the organisation, please indicate this in this section.

Date	2020-11-18
First name, Last name	Angeline Sariman
Position	Director
Telephone number	325 0011
Email address	angelineeahy@gmail.com
Signature	

Please find attached the following supporting documents verifying the accuracy of the beneficial ownership information submitted:

<text>
<text>



## A. Company

	Entry	Comments
<b>1. Company data</b>		
Registered name of the company (including legal form of legal entity)	Lavana Limited	
Country of registration	Papua New Guinea	
Unique identification number (i.e. registration number)	1-32230	
Registration authority (name of Ministry or agency that issued the unique identification number)	Investment Promotion Authority	
Contact address (registered office)	Haus, Section 30, Allotment 38, Cameron Road, Hohola	
Contact address (Address for services)	Haus, Section 30, Allotment 38, Cameron Road, Hohola	
<b>2. State Participation</b>		
<i>If the company is (100%) state owned:</i>		
Company is a state-owned (state shareholding) company	No	
State title 1	<text>	
State title 2	<text>	
Equity participation	<percentage>	
<b>3. Publicly-listed Company</b>		
<b>3.1 Company is a Publicly listed entity</b>	No	
Stock Exchange Name	<text>	
Legal Entity Identifier (LEI)	<identifier>	
Link to stock exchange documents (must include the link to BO disclosure)	<URL>	
<b>3.2 Company is a wholly owned subsidiary of publicly listed entity</b>	Yes	
Full legal name of listed entity	Santos Limited	
Stock Exchange Name	Australian Securities Exchange (ASX)	
Legal Entity Identifier (LEI)	ACN 007 550 923	
Link to stock exchange documents (must include the link to BO disclosure)	<a href="https://www2.asx.com.au/markets/company/STO">https://www2.asx.com.au/markets/company/STO</a> ; <a href="https://www.santos.com/investors/">https://www.santos.com/investors/</a>	
<b>4. Legal ownership</b>		
Full name of direct shareholder(s) (i.e. legal owners of company)	N/A	
% interest	<percentage>	
Is this shareholder a natural person (NP), a legal person (LP) or a state entity (S)?	Legal Person (LP)	
Country of registration (or nationality of a natural person)	<text>	
Unique identification number (i.e. registration number) (if LP)	<number>	
Publicly listed entity (for LP)	Yes	
Stock Exchange Name (if Publicly-listed entity)	<text>	
Legal Entity Identifier (LEI) (if Publicly-listed entity)	<identifier>	
Link to stock Exchange documents (must include the link to BO disclosure)	<URL>	
<i>(Please add more rows below if there are more than one direct shareholder)</i>		

(iii) Link to BO disclosure of Exxon Mobil Corporation :

<https://www2.asx.com.au/markets/trade-our-cash-market/announcements>

10. Barracuda Limited

(i) Company ownership map



(ii) Beneficial Ownership Declaration



**BENEFICIAL OWNERSHIP DECLARATION**

The form has 2 parts (worksheets):

Part A covers the company identification details

Part 2 is a beneficial ownership declaration form to be filled in for each beneficial owner. If there is more than one beneficial owner, please complete one worksheet per beneficial owner

It is required that fields marked in orange are completed by the company

It is optional that fields marked in green are completed by the company, unless the MSG decides otherwise. The MSG should decide on this and adjust the colours accordingly prior to distributing the template.

For questions on filling in this form, please contact [Name or Office of form administrator, email / phone number]

The template includes comment boxes that provide guidance on how to complete each section. These comment boxes should be removed by the company prior to submitting the declaration form.

**Company filing the declaration:**

Barracuda Limited
Reference to license(s) held by company

**Status**

Number of identified Beneficial Owners	N/A
Data on the Beneficial Owner was collected and was reported in sheet DF 3	No
The company is exempt from communicating data on Beneficial Owners (Publicly listed company or more than 95% owned subsidiaries of publicly listed company ), the details of which is disclosed in sheet DF 2	Yes
The shareholder holding more than 95% is a Governing authority, bodies, agencies or legal persons governed by public national laws, the details of which is disclosed in sheet DF 2	No
Company has no Beneficial Owner	No
Sufficient data could not be collected to identify the Beneficial Owners	No

**Limitation**

If sufficient data could not be collected to identify the Beneficial Owners, please explain the reasons:

**Attestation**

I, the undersigned, for and on behalf of the reporting entity, confirm that all information provided above and in the attached beneficial ownership declaration(s) is accurate and complete. If the attestation needs to be filled in by a person with a certain level of seniority within the organisation, please indicate this in this section.

Date	2020-11-18
First name, Last name	Angeline Sariman
Position	Director
Telephone number	325 0011
Email address	angelineleahy@gmail.com
Signature	

Please find attached the following supporting documents verifying the accuracy of the beneficial ownership information submitted:

<text>
<text>





**A. Company**

	Entry	Comments
<b>1. Company data</b>		
Registered name of the company (including legal form of legal entity)	Barracuda Limited	
Country of registration	Papua New Guinea	
Unique identification number (i.e. registration number)	1-14694	
Registration authority (name of Ministry or agency that issued the unique identification number)	Investment Promotion Authority	
Contact address (registered office)	Haus, Section 30, Allotment 38, Cameron Road, Hohola	
Contact address (Address for services)	Haus, Section 30, Allotment 38, Cameron Road, Hohola	
<b>2.State Participation</b>		
<i>If the company is (100%) state owned:</i>		
Company is a state-owned (state shareholding) company	No	
State title 1	<text>	
State title 2	<text>	
Equity participation	<percentage>	
<b>3. Publicly-listed Company</b>		
3.1 Company is a Publicly listed entity	No	
Stock Exchange Name	<text>	
Legal Entity Identifier (LEI)	<identifiers>	
Link to stock exchange documents (must include the link to BO disclosure)	<URL>	
3.2 Company is a wholly owned subsidiary of publicly listed entity	Yes	
Full legal name of listed entity	Santos Limited	
Stock Exchange Name	Australian Securities Exchange (ASX)	
Legal Entity Identifier (LEI)	ACN 007 550 623	
Link to stock exchange documents (must include the link to BO disclosure)	<a href="https://www2.asx.com.au/markets/company/STO">https://www2.asx.com.au/markets/company/STO</a> <a href="https://www.santos.com/investors/">https://www.santos.com/investors/</a>	
<b>4. Legal ownership</b>		
Full name of direct shareholder(s) (i.e. legal owners of company)	N/A	
% interest	<percentage>	
Is this shareholder a natural person (NP), a legal person (LP) or a state entity (S)?	Legal Person (LP)	
Country of registration (or nationality of a natural person)	<text>	
Unique identification number (i.e. registration number) (if LP)	<number>	
Publicly listed entity (for LP)	Yes	
Stock Exchange Name (if Publicly-listed entity)	<text>	
Legal Entity Identifier (LEI) (if Publicly-listed entity)	<identifiers>	
Link to stock Exchange documents (must include the link to BO disclosure)	<URL>	
<i>(Please add more rows below if there are more than one direct shareholder)</i>		

(iii) Link to BO disclosure of Exxon Mobil Corporation

<https://www2.asx.com.au/markets/trade-our-cash-market/announcements>