



# **MIRANT CORPORATION**

## **MIRANT'S ETHICS AND ANTI-CORRUPTION COMPLIANCE PROGRAMS**

**Douglas L. Miller**  
**Sr. Vice President and General Counsel**  
**Mirant Corporation**



# Mirant Worldwide Operations

- **Mirant is a Global Competitive Energy Company**
  - headquarters in Atlanta, Georgia
  - produce, purchase and sell electricity
  - purchase and sell natural gas and other fuels
  - 10,000 employees located in the Americas, Europe and Asia



# Mirant Worldwide Operations

- **Mirant Americas**
  - **Canada**
  - **United States**
  - **Bahamas**
  - **Jamaica**
  - **Trinidad and Tobago**
  - **Mexico**
  - **Chile**
  - **Brazil**
  - **Curacao**



# Mirant Worldwide Operations

- **Mirant Europe**
  - **United Kingdom**
  - **Norway**
  - **Netherlands**
  - **Germany**
  - **Switzerland**
  - **Italy**



# Mirant Worldwide Operations

- **Mirant Asia-Pacific**
  - **China**
  - **South Korea**
  - **Japan**
  - **Philippines**
  - **India**
  - **Singapore**
  - **Australia**



# Highlights of Mirant's Anti-corruption Policy

- **Joint Development Participants, Consultants and Advisors**
- **Gifts and entertainment**
- **Donations and contributions**
- **Local law requirements**
- **Facilitating or expediting payments**
- **Reporting suspected violations and suspicions**

# Keys to Success

- Top management commitment
- Compliance culture
- Training and awareness
- Due diligence