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