



**Nouri Petrochemical Company**  
Sustainability Report  
2017





# Contents

Organizational Profile

About this Report	
Sustainability basis in Nouri Petrochemical Company	
CEO Statement	
Company Introduction	
History of Nouri Petrochemical Company	
Constructing & Installing Equipment of the Complex	
Some of Main Executive Projects in Constructing the Complex	
Membership of Associations	
Address	
Employment statistics at Nouri Petrochemical Company	
Usage of Main Products manufactured by Nouri Petrochemical Company	
Usage of By- Products manufactured by Nouri Petrochemical Company	
The Export Destinations of Nouri Petrochemical Company	
Production Process of Nouri Petrochemical Company	
Organizational Chart of Company	
The Certificates Received by Nouri Petrochemical Company	
The Honors of Nouri Petrochemical Company in 1396 SH	
The Most Significant Actions taken by Nouri Petrochemical Company in 2017	

Pag 6 - 27

Key Strategic Components

Key Strategic Components			
Nouri Petrochemical Company's Mission			
Nouri Petrochemical Company's Vision in 2023			
Organizational Values			
Major Goals			
Nouri Petrochemical Company's Strategic Plan & Goals			
Corporate Social Responsibility Policy at Nouri Petrochemical Company			
Nouri Petrochemical Company's Social Responsibility Strategy		Sustainability material topics and their scops	
Company's Approach to Corporate Sustainability			
Nouri Petrochemical Company's Important Topics			
Nouri Petrochemical Company's Materiality Matrix			
Social Responsibility Executive Plan at Nouri Petrochemical Company			
Identifying & Managing Stakeholders			
Nouri Petrochemical Company's Value Chain			
Stakeholders Management at Nouri Petrochemical Company			
Nouri Petrochemical Company's Approach in Categorizing, Analyzing and Managing Stakeholders			
-Stakeholders Analysis & Mapping			
-Communication Strategy & Program			
-Engagement Techniques			
-Evaluating & Improving			
Stakeholder Engagement Approach			
Stakeholder Relations Management			
Cooperation & The Importance of Stakeholders			
1.Organizational Governance:	2.Citizenship Rights	3.Workforce (Labor force)	4.Environment
5.Business	6.Consumers	7.Local Communities Development	
Corporate Governance			
Organizing Responsible Business Management			
Legal Structure of Nouri Petrochemical Company			
Shareholders			
Structure & Composition of Board of Directors			

Pag 28 - 64

Economic Responsibilities  
Performance & Management at  
Nouri Petrochemical Company

Board of Directors Explanation	
A)Specialized Committees of the Board of Directors	B)Conflict of Interest of Board Members
C)Corporate Sustainability & Board of Directors	D)Compensation for Board Members
Social Responsibility Committee at Nouri Petrochemical Company	
Professional Ethics	
Codes of Ethics & Principles of Business Ethics	

Pag 28 - 64

Pag 65- 75

Environment Performance  
&  
Management at Nouri Petrochemical Company

Management & Performance of Economic Responsibilities at Nouri Petrochemical Company	
Review of Nouri Petrochemical Company's Economic Performance in 1396 SH	
Productive Performance at Nouri Petrochemical Company in 1396 SH	
Internal & External Consumption of Company Products	
Contributing to a Healthy and Transparent Economy	
A.Anti- Money Laundering	
B.Obtaining necessary documents from clients to organize file & paperwork	
C.Training & Empowering Employees and Optimizing Intra- Organizational Mechanisms	
D.Using Independent Auditors & Cooperating closely with Them	
E.Operational Activities & Provisions of Contracts	
F.Transparent & Accountable Financial Management	
Customers	
Ensuring Responsible Use of Products by Customers	
Supply Chain Management	

Management & Performance of Environmental Responsibility at Nouri Petrochemical Company	
Environmental Management	
The Environmental Activities	
Important Activities done to Environment Protection Management	
Environmental Projects & Plans	
Environmental Programs Budget in 1396 SH	
A.Current Projects	B.Capital Projects
Environmental Assessment	
Energy Management	
Energy Management Actions done by Nouri Petrochemical Company	
Ongoing Programs to Manage Energy & Greenhouse Gases Emissions Reduction	
Activities done to Manage Energy	
Gas Emissions	
Water Resources management	
Effluents	
Waste Management	
Considering Requirements	
Waste Disposal Process Graph	
Humpback Dolphin Conservation Project at Dayer- Nakhiloo National Park & Protected Area of Bushehr Province	
Environmental Awareness Raising & Training	
Complex Green Space	

Pag 76- 109

Social Responsibilities  
Performance & Management at  
Nouri Petrochemical Company

Management & Performance of Social Responsibilities at Nouri Petrochemical Company	
Employees	
Employees; the Most Important Capital at Nouri Petrochemical Company	
Nouri Petrochemical Company's Strategic Approach to Human Resources	
Employees' Health & Safety	
Employees' Health	
Maintaining & Controlling Level of Employees' Health	
Employees Development & Training	
Employee Satisfaction Assessment	
Benefits & Welfare Services	
Improving Employees' Occupational Participation at Nouri Petrochemical company	
Work- Life Balance	
Diversity & Equal Opportunities	
Measures Taken in Unifying Payment of Different Types of Employment	
Respect for Cultural Diversity & Non-Discrimination	
Parental Leave	
Employee Relationship Management	
ISO- 26000 Project	
Corporate Social Responsibility for the Community	
Managing Community Contribution Programs	
Measuring Community Satisfaction	

Pag 110- 139

GRI Content Index	
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140



The logo for Nouri Petrochemical Company, featuring the word "Nouri" in a large, bold, black serif font. Below it, the words "Petrochemical" and "Company" are stacked in a smaller, black, sans-serif font, separated by a thin horizontal line.

**Nouri**  
Petrochemical  
Company

Organizational Profile

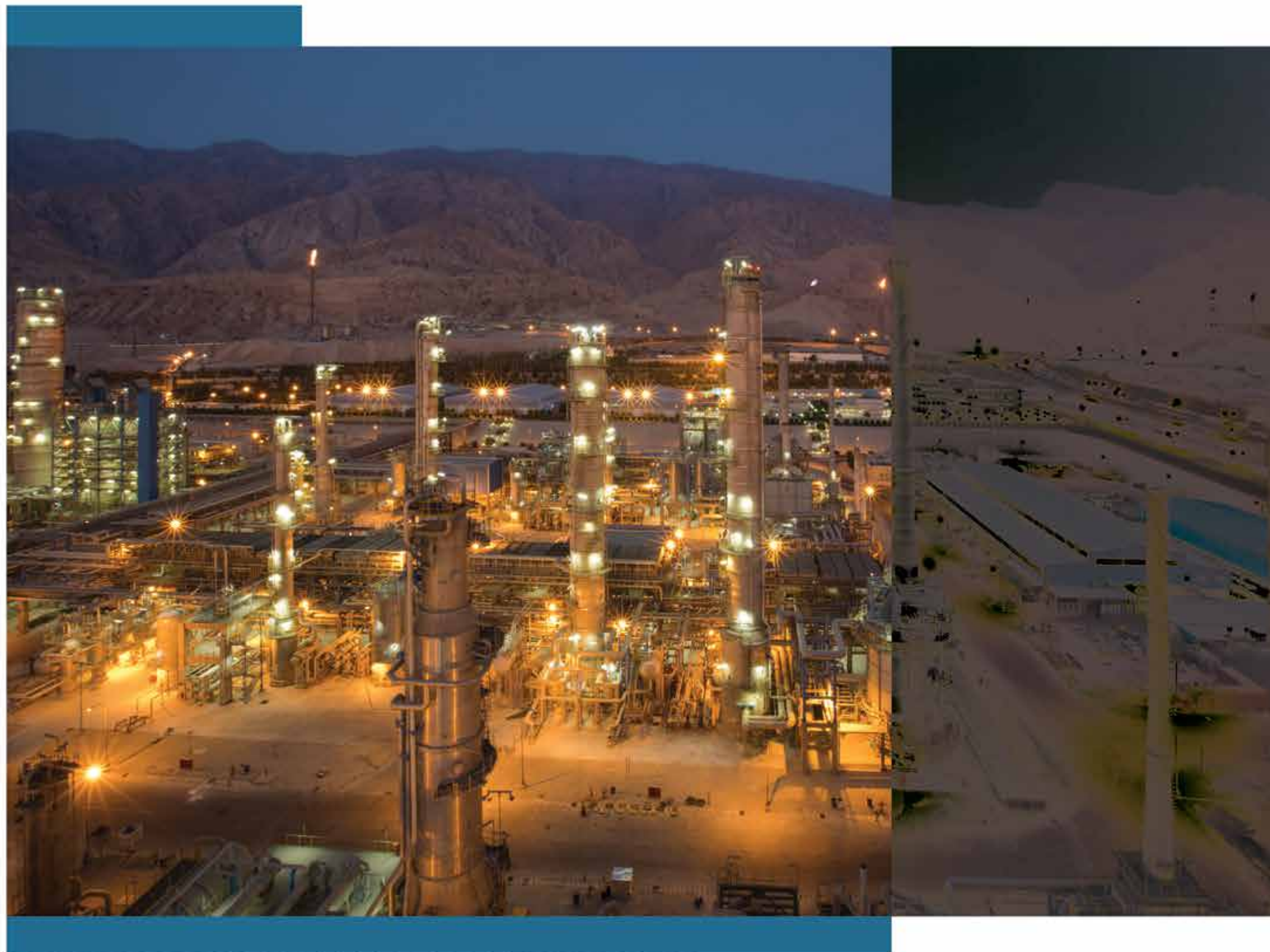


## About this Report

— This is the first sustainability report of Nouri Petrochemical Company which covers its sustainable and responsible management and performance in 1396 SH (2017/18). For the sake of providing report audiences with a more meaningful picture of company statues, this report includes important programs and actions taken in the last 5 years form 1392 SH (2013/14) to 1396 SH (2017/18). Sustainability reporting period matches fiscal year in Nouri Petrochemical Company which is according to the Solar Hijiri calendar year in Iran.

— Preparing report content and gathering required data and information were done using different methods including studying company documents & official reports, interviewing with senior managers, holding several meetings with experts of various units, interviewing with major external stakeholders. The level of information coverage is specified in each section.

— This report has been prepared in accordance the GRI Standards 2016, but no claim about compliance level is made. GRI content index is provided at the end of this report which lists all GRI Standards used and disclosures reported. Interested parties may contact Public Relations of Nouri Petrochemical Company by Tel: +98 77 37303068 or via email .

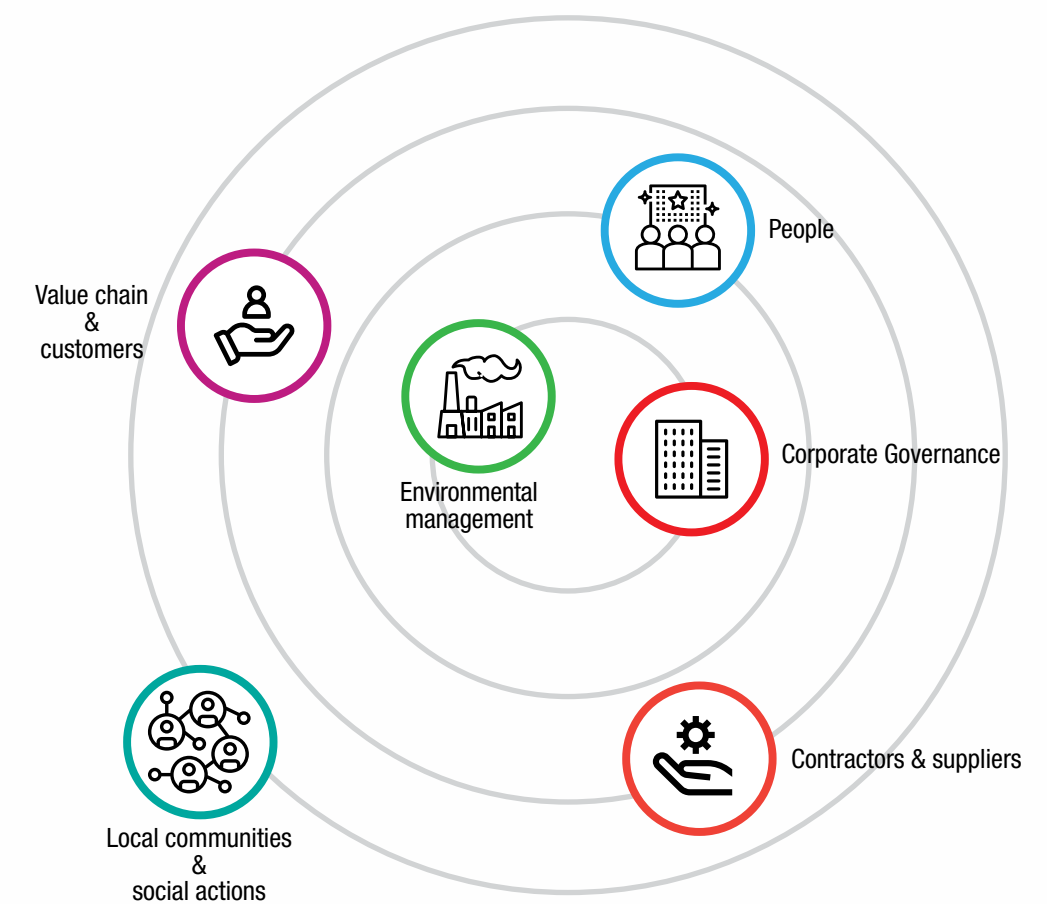




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### Sustainability basis in Nouri Petrochemical Company

Materiality analysis and CSR maturity level evaluation have been foundations of determining main areas of responsible actions in Nouri Petrochemical Company. Also, it's intended to do periodical evaluations of changes in material issues and company progress in its sustainability plans. Subsequently, necessary revisions would be considered in related plans and actions.







### CEO's Statement

—It would be definitely our pleasure that Nouri Petrochemical Company presents its first sustainability report. Nouri Petrochemical Company is one of the main manufacturers of aromatic products in the world. Our corporate values act as a guiding compass in our sustainability journey and we have determined our sustainability and social responsibility objectives clearly. We comprehensively realized that the only way to achieve our major sustainability organizational goals is through being committed to these values in Nouri Petrochemical Company. Our long-term goal is being a sustainable dynamic company through having responsible continuous cooperation and interactions with our stakeholders in community, environment and economy spheres. We are sure Nouri Petrochemical

Company could improve its performance through committing to this goal continuously.

—As a corporate citizen, every enterprise has specific rights and duties. Nouri Petrochemical Company is not exception to this rule. Considering environmental, social and economic challenges in our surrounding community, we obligate ourselves to decrease negative impacts of our business and increase positive impacts of our operations. We believe that it would be surely possible through relying on fundamental values of the company namely rule of the law, rationality and public participation.

—We are looking for improvement of the current situation with the aim of progressing in our sustainability journey and through benefiting from the guidance provided in ISO 26000 and GRI standards. Therefore, the following key approaches have been pursued:

1. Nouri Petrochemical Company continuously internalizes its organizational values, responsible behavior rules in its business and value chain. This approach would result in increasing transparency in activities, enhancing shareholders' and stakeholders' trust and decreasing business risks given the importance of this issue, this company has developed an awareness raising plan about its fundamental values among its internal and external stakeholders. This vital matter is considered as one of Public Relations' duties.

2. Although Nouri Petrochemical Company endeavors to maximize satisfaction of shareholders who are one of its key stakeholders; but it's aware of the fact that having a stakeholder-oriented approach is a requirement for sustainable management of the organization and successful integrated risk management. In line with this understanding, Nouri Petrochemical Company have changed shareholder-oriented management approaches to stakeholder-oriented ones in all its organizational matters. Consequently, it has shifted its focus on profit to three pillars of profit, people and planet.

3. Nouri Petrochemical Company as one of the largest companies in Oil, Gas & Petrochemical industry in Iran, obligates to improve its activities continuously. Moreover, this company obligate to have particular plans and study environmental, social and economic impacts of its activities with the purpose of developing measures related to its sustainability. This company also emphasizes on improving these plans objectively.

4. Focusing on sustainability and social responsibility in Nouri Petrochemical Company is not limited to

compliance with laws and regulation. In addition to this commitment and in line with our corporate values, we continuously implement CSR activities beyond minimum legal requirements and try to improve performance to reach our targets.

5. Climate change, air pollutions, employee health and safety, environmental protection, citizenship rights, and direct/indirect economic impacts at the local and national levels are among material issues considered in our corporate strategies. Also, we continuously monitor related targets and our progress towards them.

6. In Nouri Petrochemical Company, we believe that budget allocation to activities leading to greater sustainability and development in company is not only cost, but also it is considered as an investment which would continually create more value for our organization. It is worth noting that Bord of Directors of Nouri Petrochemical Company supervises all CSR activities which are defined and implemented based on materiality analysis results. This supervision and monitoring are done on behalf of shareholders.

7. one of the material topics which Nouri Petrochemical Company puts emphasis on, is atmospheric pollutants and their effects on surrounding environment. Our attempts in managing and minimizing this impact is described in related section of this report.

8. The other material issue that our company puts emphasis on, is considering development of human resources in all occupational aspects related to the company as well as personal, social & economic improvement in their life. In addition to its previous efforts in this regard, Nouri Petrochemical Company has prepared a variety of plans and strategies for the future with the intention of achieving this goal.

9. Nouri Petrochemical Company seeks to promote corporate sustainability principles and responsible business throughout its value chain. In this regard, the company uses all its facilities such as meetings for consulting with stakeholders, public reporting through Public Relations and etc.

10. Learning from best practices and other companies' experiences, Nouri Petrochemical Company seeks to manage CSR related expenditures in a way that leads to value creation for its organization and its key stakeholders at the same time.



# Nouri Petrochemical Company

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## COMPANY INTROUCTION

### General Specifications:

- Geographic Location: 280 kilometers from the center of Bushehr province in Pars Special Economic Energy Zone in Assaluyeh
- Complex Area: 61 Acres
- Main Reason of Establishing: The added value of the country's hydrocarbon (gas condensate)
- Initial Investment: 8 Trillion Rials
- Direct Employment Rate: approximately 1200 people

### Production Position:

- The fourth company producing Aromatic in Iran
- One of the largest companies producing Aromatic Materials with the capacity of 4/5 million tons per year.

### Shareholders:

- Persian Gulf Petrochemical Industries Company: 76.55 %
- Social Security Investment Company: 17 %
- Pension Fund Investment Company: 6.45 %

### Particular Specifications:

- Having adequate feed & energy supply sources in Pars Special Economic Energy Zone
- High capacity of Energy
- Multi – product Economy (diversity in company's products)
- Distinguished geographic location in Iran and access to international waters (high seas) (Ease of Exports, decreasing transport costs
- Employing professional, young and enabled workforce





## History of Nouri Petrochemical Company

- Nouri Petrochemical Company was established in 1998
- Executive operations of constructing the Complex's building & installing equipment was commenced on November 2000.
- First production unit of the Complex was launched in on February 2007.
- The Complex was officially opened on June 2007

## Constructing & Installing Equipment of the Complex

- Basic, Detailed Engineering & Procurement and Consortium Equipment Contractor: Toyo Consortium (Japan), Sazeh (Iran), LG (South Korea)
- License of Processing Units: AXENS France, COROP UHDE Germany, and TORY Japan
- **Manufacturing Equipment:** The total weight of equipment of this Complex is about 100 thousand tons. 20% of the above – mentioned equipment was made by Iranian manufactures.
- **Constructing:** 100% of constructing is done by Iranian manpower a joint venture between Jahan Pars Co., Kayson Inc., Tehran Jonoob Co. Machine Sazi Arak Co. and Iran Industrial Buildings Co.

## Some of Main Executive Projects in Constructing the Complex

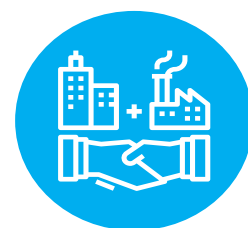
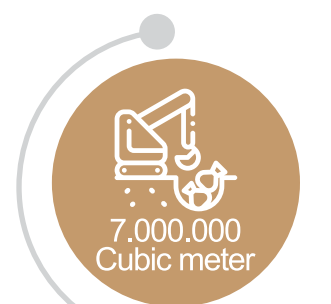
- **Excavation:** 7 million cubic meters
- **Concrete Placing:** 110 thousand cubic meters
- **Piping:** Approximately 1150000 inch – diameter
- **Insulation:** 180 thousand square meters
- **Painting:** 940 thousand square meters
- **Power (electrical) Cabling & High Precision Tools:** 1650 Km

## Membership of Associations:

- Petrochemical Industry Employers Association
- Iranian Oil, Gas and Petrochemical Products Exporters' Union

## Address:

- 280 kilometers from the center of Bushehr province in Pars Special Economic Energy Zone in Assaluyeh, Bushehr
- **Central Office:** Level 5- Kian Tower – west Dastgerdi-Valiasr - Tehran



1998



2007



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## Employment statistics at Nouri Petrochemical Company

**Number of Employees in 1396 SH:** 1179 (1160 men & 19 women)

**Corporate Employees:** 518 (504 men & 14 women)

— Permanent Employees (348 people)

— Fixed – term contract Employees (31 people)

**Subcontractors Employees: people: 661 (656 men & 5 women)**

Maintenance (195 people)

Technical Services (101 People)

Public Services (110 people)

Catering (73 people)

Cleansing & Green Areas (71 people)

Security (12 people)

Transportation (87 people)

Fire Alarm System (1 person)





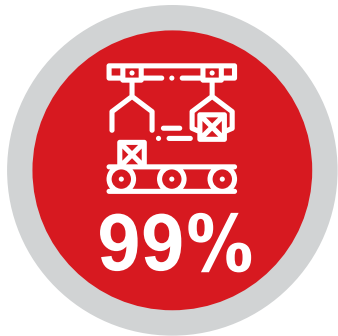
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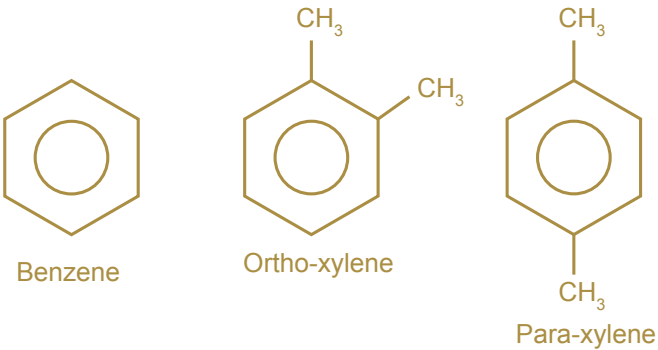


Optical petrochemical performance in 1396 at a glance

- Achieving the production record of 107% of the product production program in 1396
- 99% of the nominal production capacity of products
- 10% of the country's petrochemical industry products
- 52% of Persian Gulf Petrochemical Industries Holding
- \$ 1 billion in exports



Complex Feed		
4.77 million ton per year		
Gas Condensate	4.5 million ton	Received from Refineries of South Pars Gas Complex
Pyrolysis Gasoline	270/000 Tones / Year	Received from JAM petrochemical Co. (Tenth Olefin)
Nouri Petrochemical Company receives all utility services including electricity power, steam, different types of water, Nitrogen, .... from Mobin Petrochemical Company (centralized utility supplier).		
Main Products of the Complex		
1.2 million tons per year		
Para – xylene		750000 tons per year
Benzene		330000 tons per year
Ortho – xylene		80000 tons per year
By Products of the Complex		
3.3 million tons per year		
Heavy HYDROCARBONS		1980000 tons
Heavy AROMATICS		16000 tons
RAFFINATE		769000 tons
Light HYDROCARBONS		380000 tons
Liquid Petroleum Gas (LPG)		76000 tons
PENTANE		47000 tons
HYDROTREATING NAPHTA (HTN)		120000 tons





## Usage of Main Products manufactured by Nouri Petrochemical Company

### Products:

Polyesters, Synthetic (artificial) fiber, paints, Resins, Disposable bottles, Nylon, Detergents, Pharmaceutical compounds, Pesticides, Industrial solvents, etc

## Usage of By - Products manufactured by Nouri Petrochemical Company

One of the most significant feed in Olefin Unit

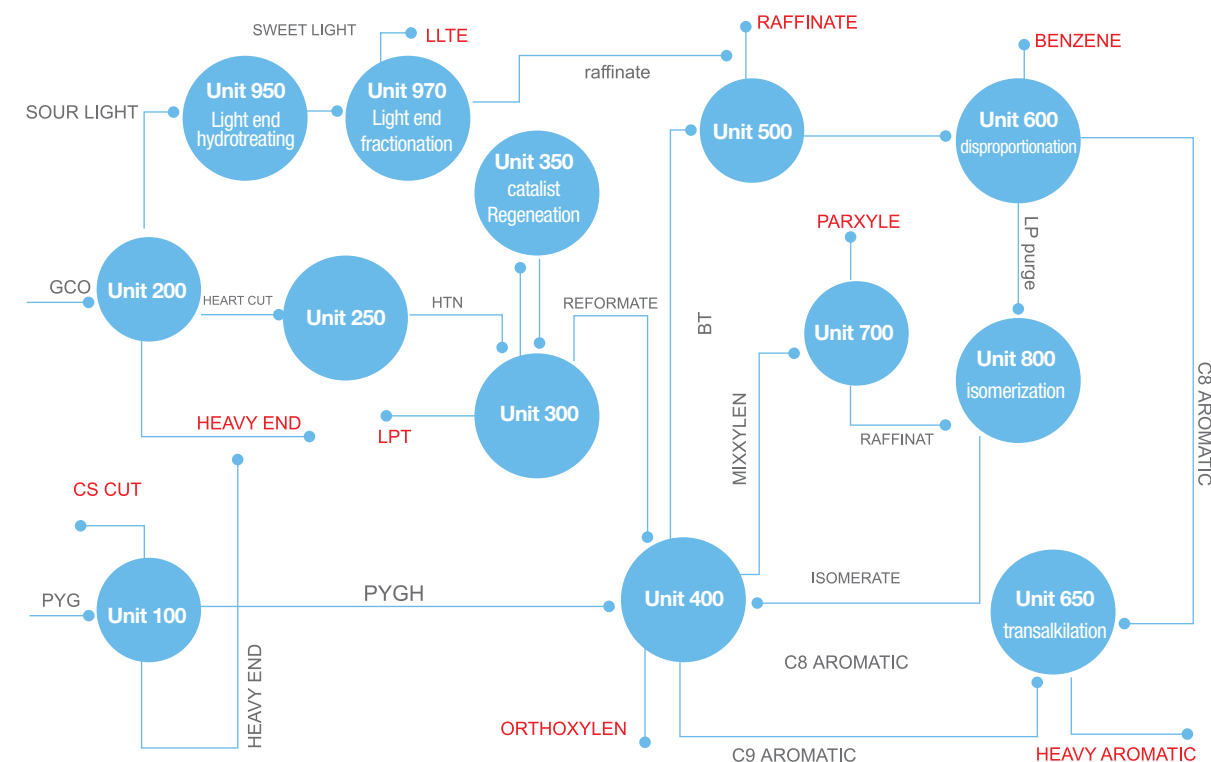
Also, could be used in Refinery Industries with the aim of manufacturing petroleum products.

## The Export Destinations of Nouri Petrochemical Company

In addition to using the products manufactured by this Complex in Iran, they are exported to different parts of the world. Countries situated in Europe, East & Southeast Asia, countries in The Persian Gulf region, India, etc.

## Production Process of Nouri Petrochemical Company

Nouri Petrochemical Company consists of 13 Process Units and 1 (product) Storage & Transfer Unit. To illustrate, these units are responsible for receiving feed, producing and transferring the products. All operational control is done by advanced control systems such as DCS (Distributed Control System) & FCS (Fieldbus Control System) and experienced & expert human forces.



**Unit 100:** Pyrolysis Gasoline Hydrogenation: Removal of impurities (Nitrogenous, Sulfur - containing & olefin compounds)

**Unit 200:** Preparation of Gas Condensate (Separation of light & heavy compounds)

**Unit 250:** Product Hydrotreating Heart Cut receiving from Unit 200 as output

**Unit 300:** Catalytic Reforming (reforming Paraffin & Aromatic compounds)

**Unit 350:** Catalytic Regeneration

**Unit 400:** Separation of Reformate & Aromatics and Ortho - xylene

**Unit 500:** Extraction of Benzene & Toluene from Nonaromatic hydrocarbons using Normal Morpholine Solvent

**Unit 600:** Separation of Benzene from Toluene and Reforming Toluene to Benzene

**Unit 650:** Reforming 9 - carbon Hydrocarbons (received from Unit 400) to Xylene mixture and coming back to Unit 400

**Unit 700:** Separation of Para-Xylene from Mixed Xylenes received from Unit 400 using adsorption by molecular sieve

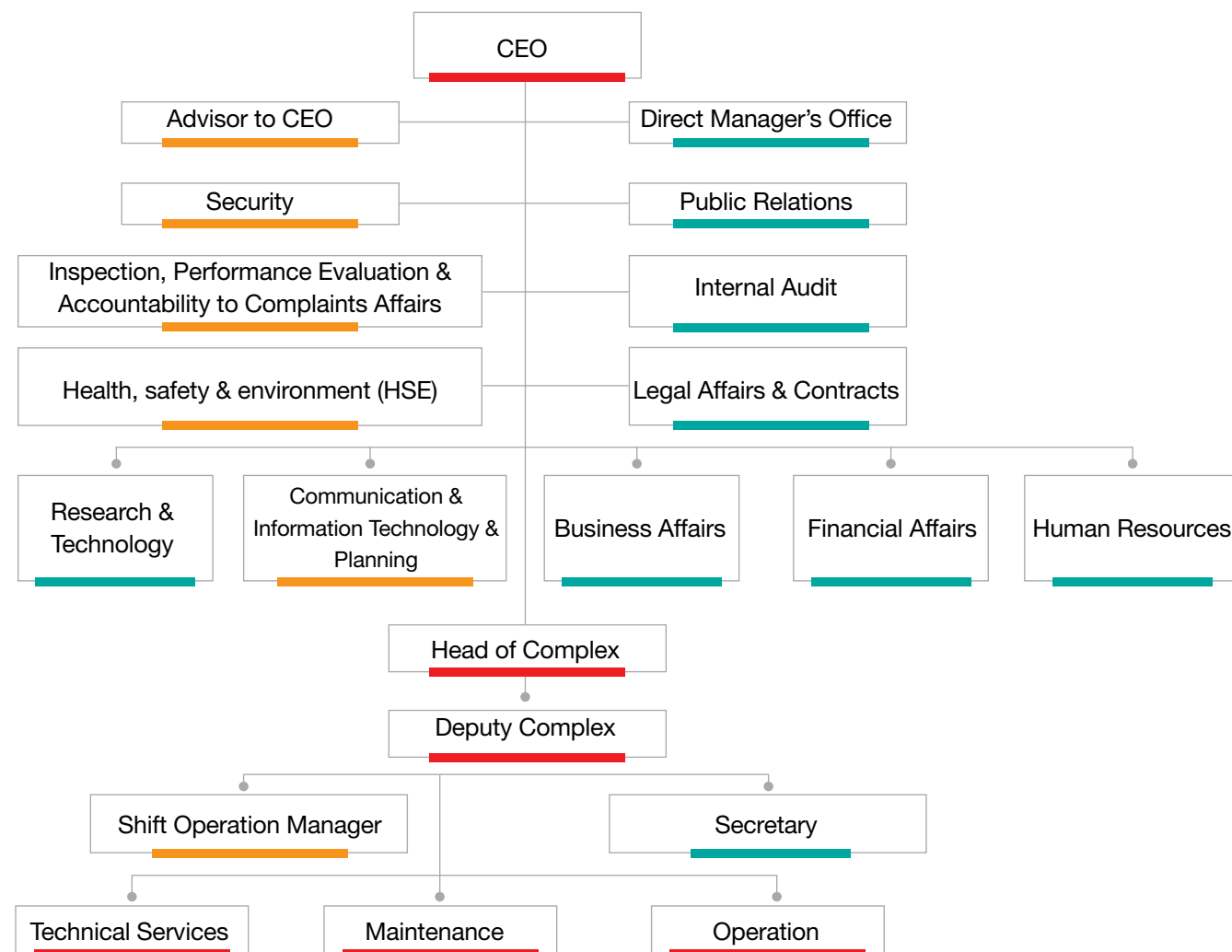
**Unit 800:** Enriching Xylene mixtures (from Unit 700) with Para-Xylene and sending to Unit 400 to further separation

**Unit 950:** Desulfurization of light cut produced in Unit 200 for sending to Jam Petrochemical Company

**Unit 970:** LTE SPLITTING



## Organizational Chart of Company



## The Certificates Received by Nouri Petrochemical Company

- Health, Safety & Environment Management System MS – HSE
- Occupational Health & Safety Management System OHSAS18001
- Environmental Management System ISO14001
- Quality Management System ISO9001
- Quality Management System of Oil, Gas & Petrochemical TS29001/ISO
- Laboratory Quality Management System IEC/ISO17025
- Energy Quality Management System ISO50001
- Quality Management System for Training ISO10015





## The Honors of Nouri Petrochemical Company in 1396 SH

- Achieving 107 percent of Complex Production Plan
- Achieving 99 percent of Nominal Capacity of Complex Production
- Top export-oriented company in twentieth ranking of Industrial Management Organization IMI - 100
- Taking first place in Production Petrochemical Companies Group in twentieth ranking of Industrial Management Organization IMI - 100
- Receiving Crystal Statue of Oil Industry Excellence Award
- Receiving three - star Silver Statue from National Energy Management
- Opting Nouri Petrochemical Company as Leading Exporter in Bushehr Province & Iran
- Obtaining National Standards of Benzene, Para - Xylene & Ortho - Xylene and Standardizing Heavy Compounds, Naphtha, Raffinate & Heavy Aromatics from Iranian National Standards Organization
- Receiving The Excellence Badge of Entrepreneurship from Organization of Industry, Mine & Trade, obtaining Certificate of Conformity to ISO10015 (Quality Management System for Training)
- Obtaining Top Rank of Research & Development at the Fifth Research & Technology Festival of Industry, Mine & Trade
- Obtaining Certificate of Conformity to Energy Consumption from Iranian National Standards Organization
- Extending Certificates related to standard, OHSAS18001, IEC/ISO17025 (2015), ISO 1400(2015), ISO9001 (2015) and ISO29000 (2015)
- Winning first place in Sports held in Assaluyeh since seven years ago



## The Most Significant Actions taken by Nouri Petrochemical Company in 1396 SH

- Holding training courses and International Minimum Industry Safety Training (IMIST)
- Surveillance to develop Process Safety Management (PSM)
- Caring Audit related to ISO50001 & HSE - MS
- Conducting Feasibility Studies of Recovery of gas flare & producing Ammonium Sulfate.
- Holding the third annual meeting of foreign customers at the Complex
- Implementing Social Responsibility Management System on the basis of ISO26000
- Visiting different categories of Society including organizations, students, college students & instructors
- Installing Information Digital Panels at the Complex



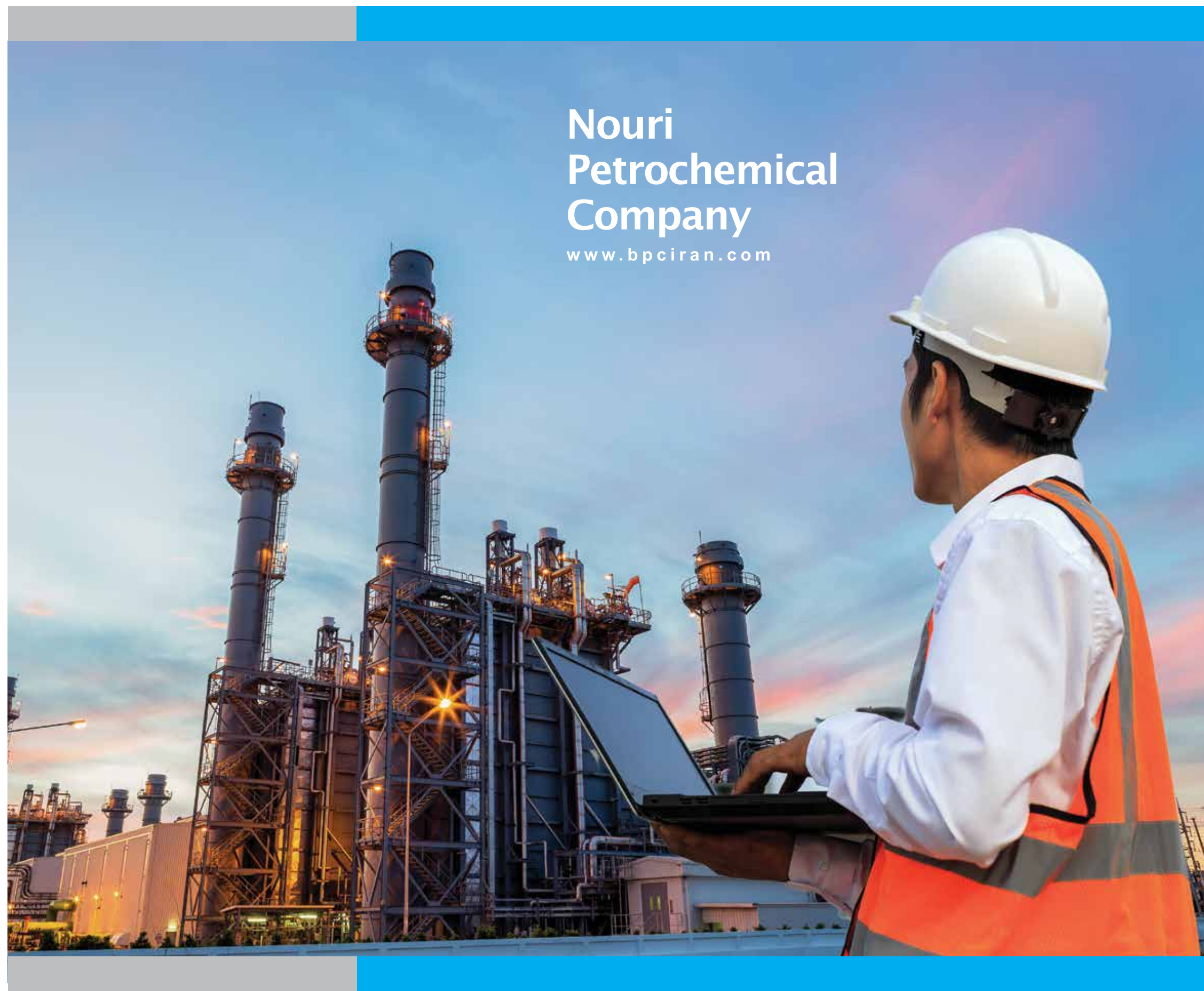
## Key Strategic Components

### Nouri Petrochemical Company's Mission

Manufacturing high – quality Aromatic products and by – products from gas condensate & Pyrolysis gasoline with the purpose of estimating the expected values of customers using productive production system based on the latest technologies, stable supply chain and using effective communication mechanisms with stakeholders through actively cooperating with partners, committed human force and experts having constant and responsible look.

# Nouri Petrochemical Company

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### Nouri Petrochemical Company's Vision in 2023

Excellent Organization with sustainable production & profitability and the least waste of resources

### Organizational Values



Protecting Environment and considering safety principles



Continuous improvement, teamwork, innovation & creativity



Business Ethics (accountability, responsibility, sustainability)

### Major Goals

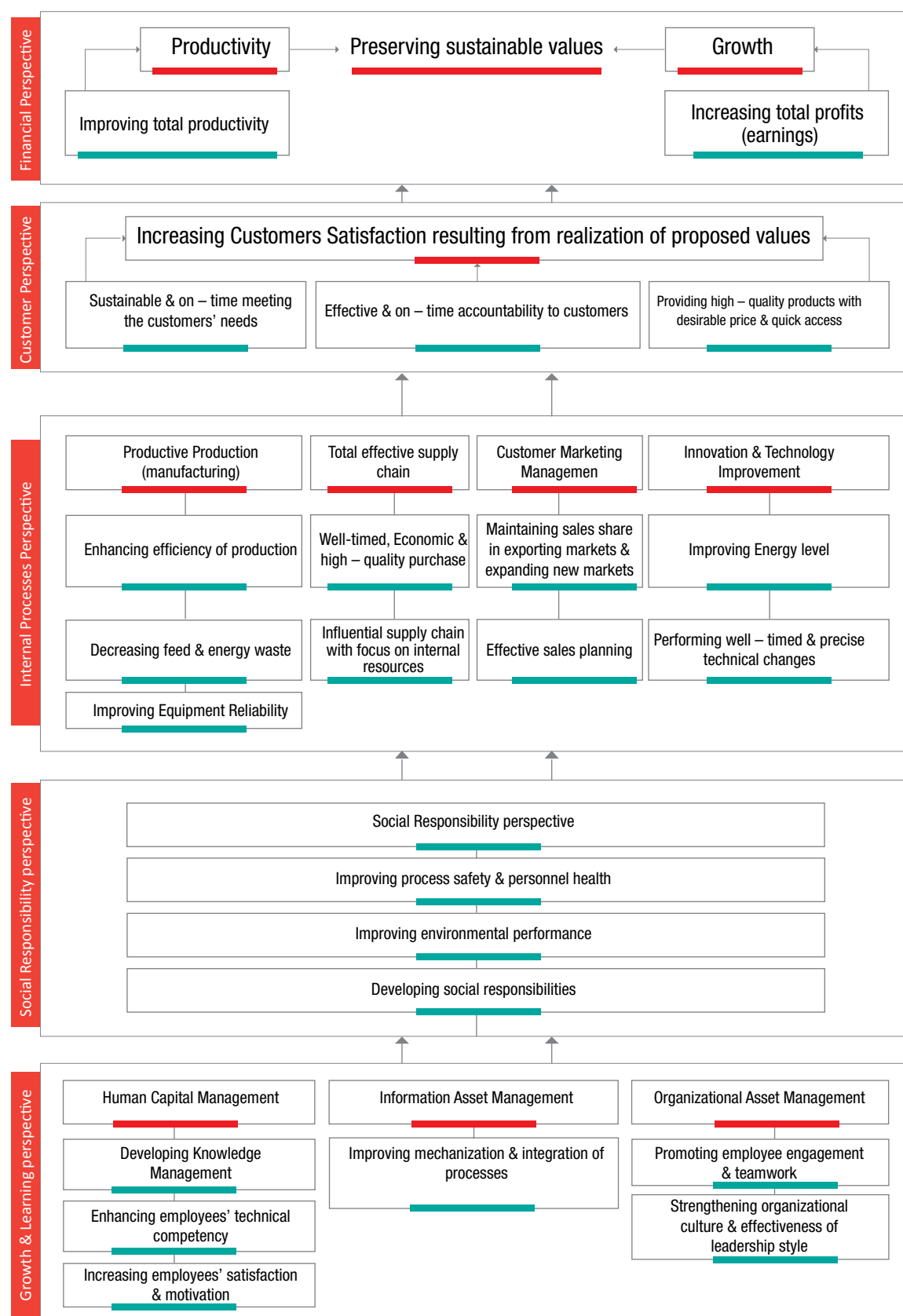
1. Increasing profitability
2. Increasing stakeholders' satisfaction
3. Improving productivity
4. Improving Health & Safety
5. Decreasing adverse environmental impacts
6. Reducing energy consumption
7. Empowering employees

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## Nouri Petrochemical Company's Strategic Plan & Goals



1

### Corporate Social Responsibility Policy at Nouri Petrochemical Company

Public participation is considered as one of the fundamental values at Nouri Petrochemical Company. In this regard, it has contributed in achievement of sustainable development goals through social responsibility activities. Considering Corporate Social Responsibility Policy, Nouri Petrochemical Company focuses on four spheres as follows;

1. Performing in the context of sustainability by considering how our business and operations might affect stakeholders in environmental and social aspects.
2. Using engineering knowledge and employees' experiences with the aim of supporting economic & social development in local community and country.
3. Implementing corporate social responsibility plans and projects, with focus on local participation and in coordination with community organizations.
4. Supporting and employees' participation in carrying out corporate responsibility & sustainability plan



2



3



4





## Nouri Petrochemical Company's Social Responsibility Strategy

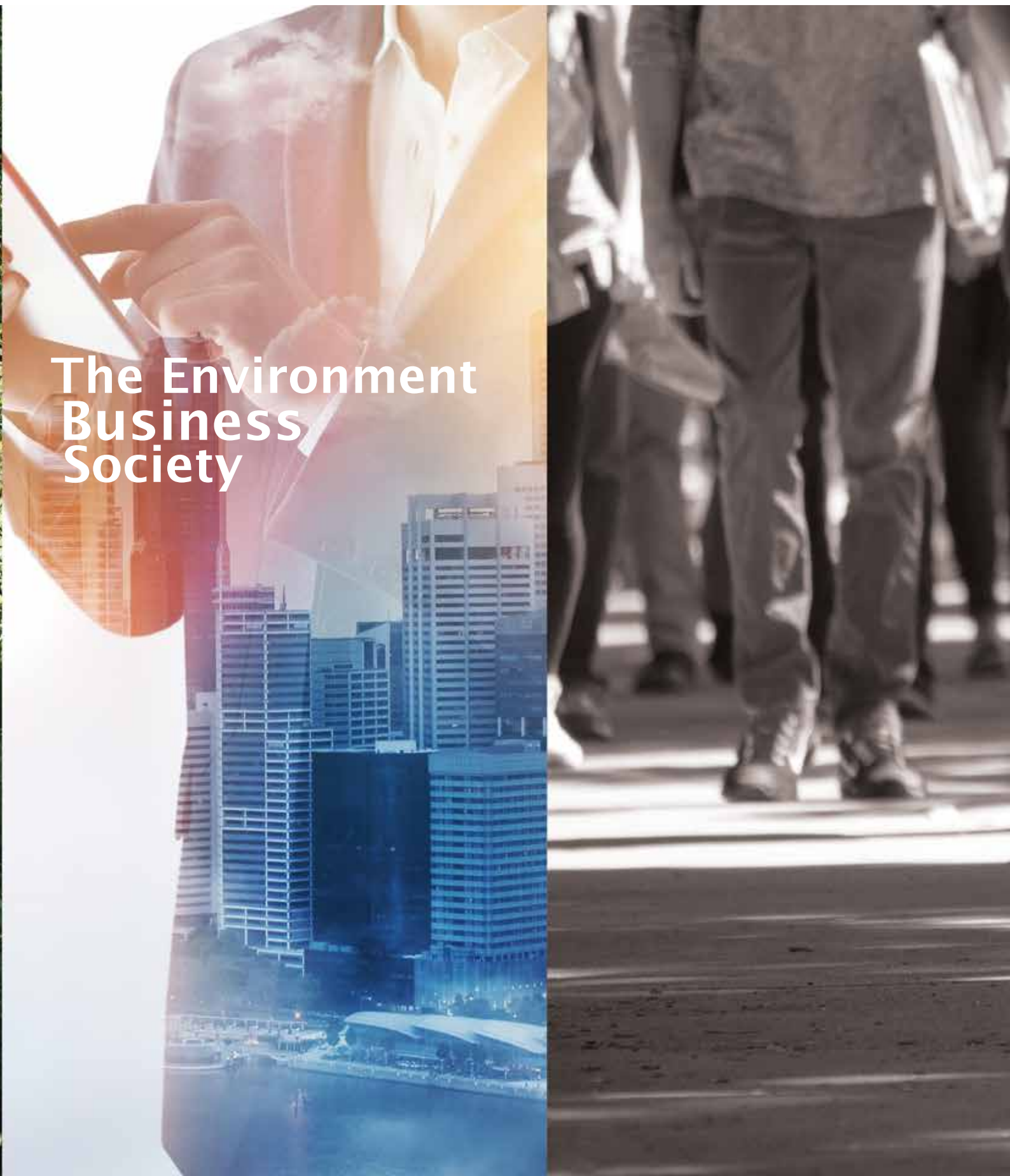
— Three main fields of sustainability at Nouri Petrochemical Company which are considered as fundamental bases for all activities done in the company are as follows; 1. Environment 2. Business 3. Society

— In the field of environment, Nouri Petrochemical Company offers innovative solutions and process with the purpose of improving its local community, supply chain & environmental balance. In the field of business, this company focuses on creating long – term value. In the field of Society, it focuses on empowering humane resources as well as being a good citizen in the community in which it operates.

— It should be noted that Nouri Petrochemical company's social responsibility strategy has been compiled with the intention of achieving corporate sustainability objectives and policy. Consequently, this strategy could help the company in fulfilling its commitments. Nouri Petrochemical Company's social responsibility strategy is as follows;

1. Implementing corporate social responsibility plan with a focus on synergy in plans & projects of Persian Gulf Petrochemical Industries Company
2. Focusing on four fields of training, conservation of energy & natural resources, environment protection and improving quality of employees' lives and local community.
3. Enhancing cooperation between private sector, public organizations and local community in compiling & implementing corporate social responsibility projects, with the aim of improving corporate sustainability network in the region.
4. Promoting participation of all interested parties in implementation of corporate social responsibility plans including non-governmental organizations, local authorities, employees, suppliers and customers.

## The Environment Business Society





## Sustainability material topics and their scope

### Company's Approach to Corporate Sustainability

—As a matter of fact, corporate sustainability includes all activities and strategies which meet today's stakeholders' needs and it preserves human & natural resources required for future generations simultaneously. According to this approach, companies with any operational scales require to turn restrictions to opportunities by considering economic complexities in long run. Furthermore, creating positive social and environmental impacts should be in the center of their business activities through applying innovative solutions. Therefore, Nouri Petrochemical Company considers health of society, company & environment on basis of its corporate sustainability approach and it emphasizes on important issues such as corporate governance, environmental management, employees' health & safety, empowering employees and supply chain, fair competition and customer development.

—Based on special attention of the management and employees working for Nouri Petrochemical Company to social responsibility and its impact on company's business as well as considering relation of social responsibility with sustainable development, according to ISO 26000, the company management set "Social Responsibility Approach" with the purpose of integrating social responsivities in the organization since 2017.

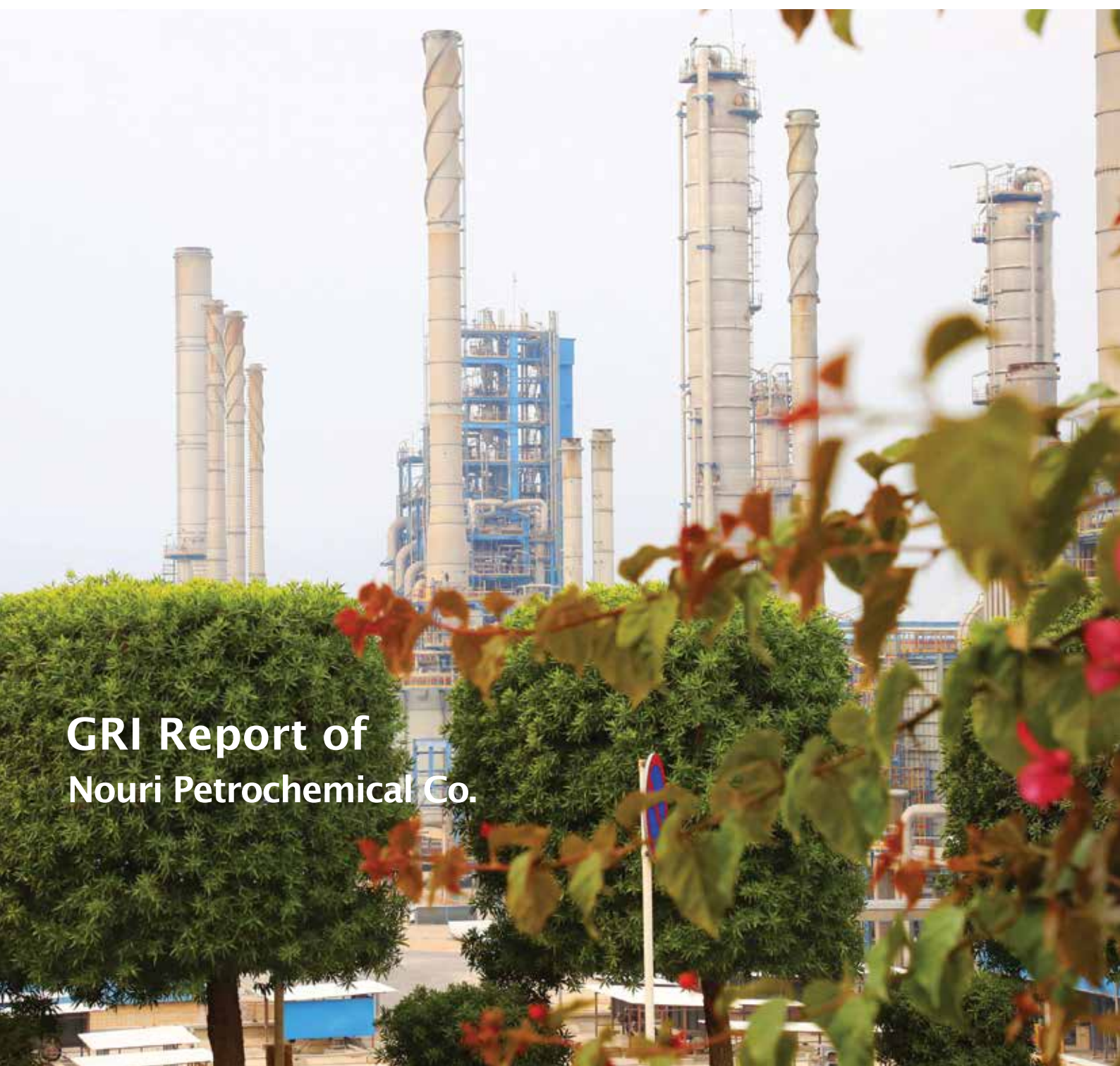
—Recognizing social responsibility involves identifying issues arising from the impact of decisions and actions of the company as well as determining the approach that must be adopted to address these issues and achieve sustainable development. It also includes identifying social responsibility, including recognizing stakeholders. Consequently, it should be commented based on these two criteria which are how social responsibility measures are defined and how planning is done at Nouri Petrochemical Company. So, the information related to stakeholders and their expectations were completed through stakeholders' questionnaires. After analyzing the questionnaires, the matrix of significance was extracted and stakeholders' needs were determined. Therefore, predicting stakeholders' needs and expectations has been improved by taking social responsibility approach at Nouri Petrochemical Company. Finally, it resulted in comprehending and planning for appropriate reactions



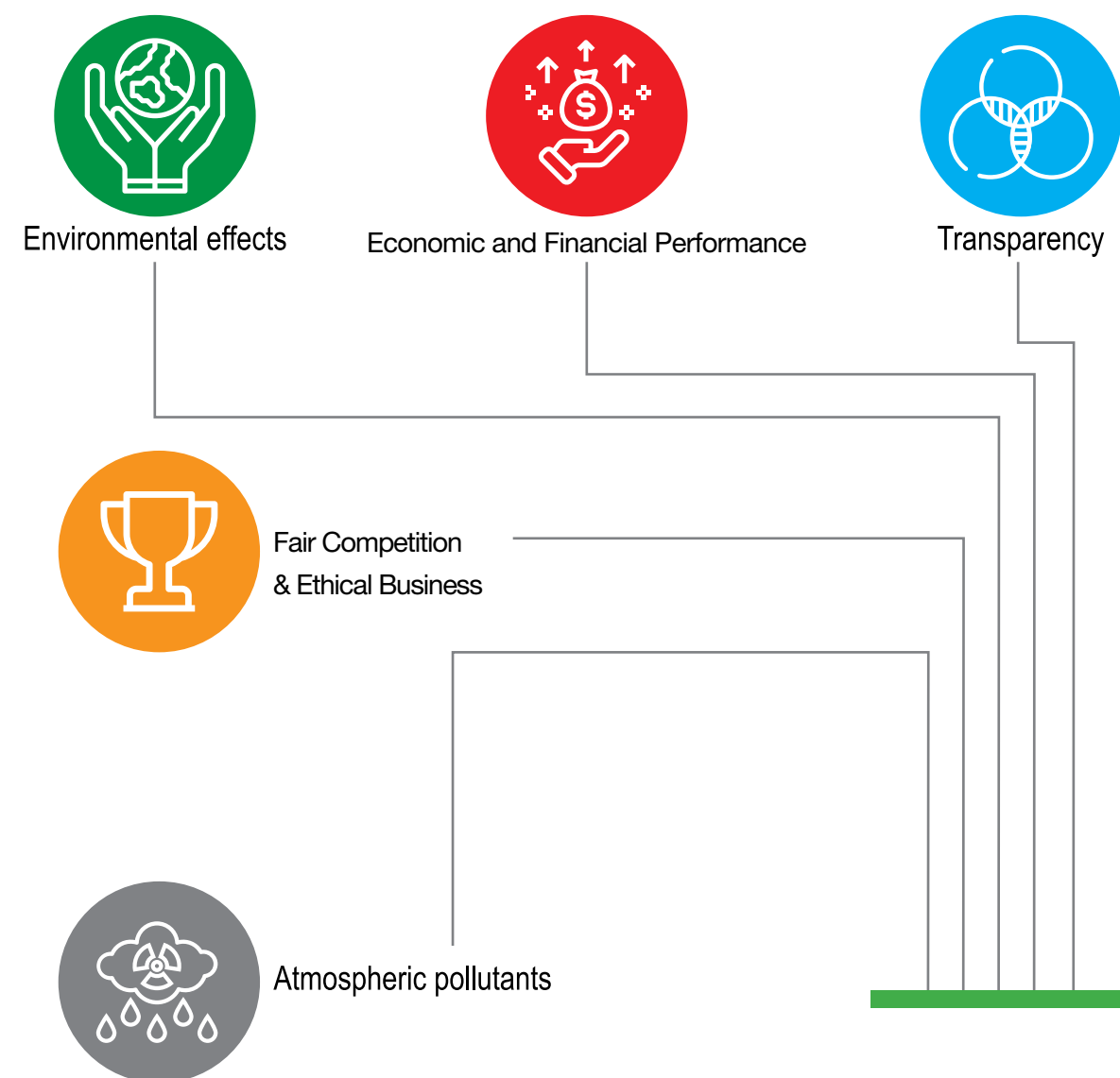
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- Transparency
- Economic and Financial Performance
- Environmental Effects
- Fair Competition & Ethical Business
- Atmospheric Pollutants



# GRI Report of Nouri Petrochemical Co.



## Nouri Petrochemical Companies' Materiality Matrix

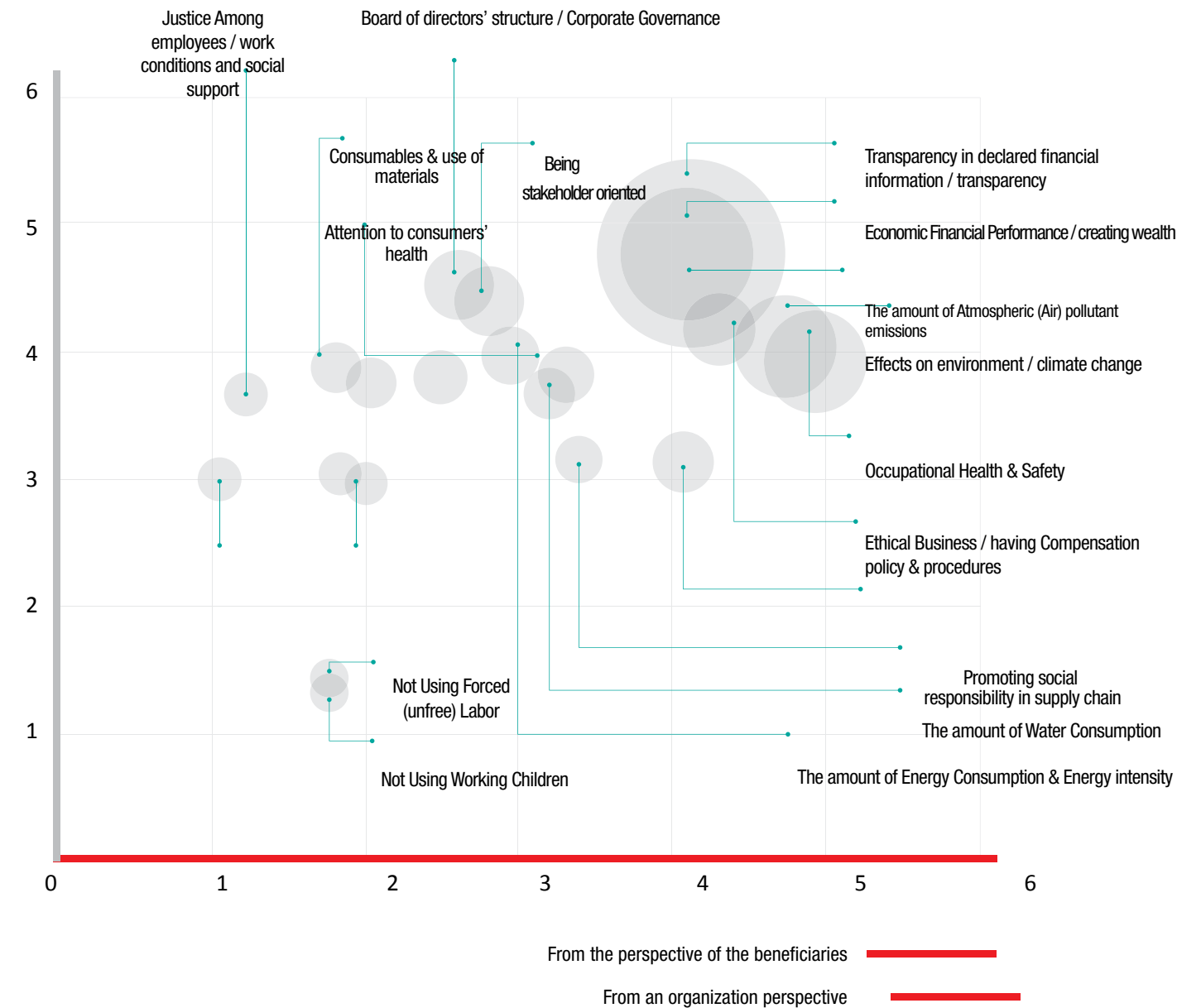
According to principles of responsible business, material issues have been prioritized from company & stakeholders' perspective for Nouri Petrochemical Company. In this regard, 1. Transparency 2. Economic and Financial Performance 3. Environmental Effects 4. Fair Competition & Ethical Business 5. Atmospheric Pollutants are considered as the main priorities of the company. Moreover, the following table shows prioritizing important issues from company & stakeholders' perspective. It should be noted that important issues from organization perspective were completed in Strategic Council through interviews and filling in questionnaires at Nouri Petrochemical company. Also, with the intention of finding out stakeholders' opinions, stakeholders first were categorized and then interviewed with the most important ones. Subsequently, relevant questionnaire was sent to those stakeholders whom could not be present for interview. The results are indicated in the following table.



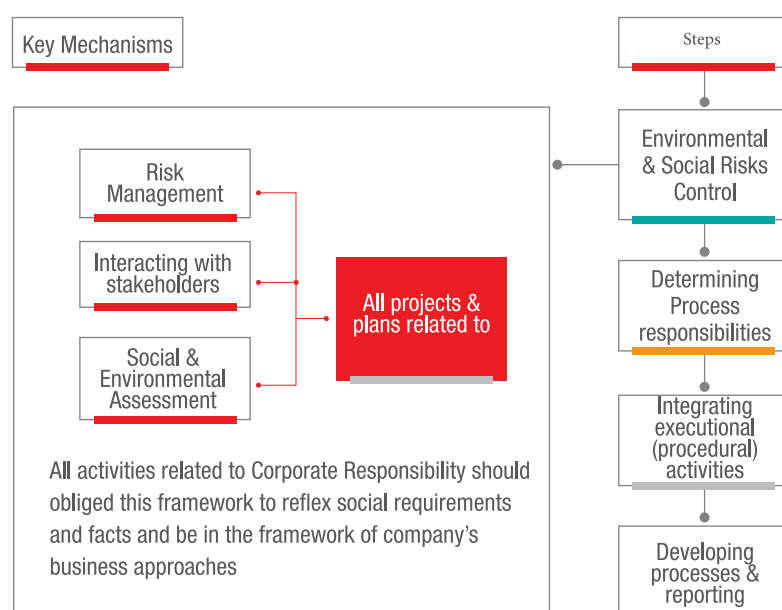
## Nouri Petrochemical Company's Material Issues

	From stakeholders' perspective	From organization's perspective	Rank
Board of directors' making – decision structure / Corporate Governance	2.62	4.53	7
Economic Financial Performance / creating wealth	4.09	4.79	2
Performance in market of competition & Sales / fair competition	4.75	4.06	4
Stakeholder	2.81	4.40	8
Transparency in presented financial information / transparency	4.13	4.77	1
Effects on environment / climate changes	4.91	3.94	3
	1.82	3.87	15
The amount of Energy Consumption & Energy intensity	2.96	3.98	11
The amount of Water Consumption	3.20	3.66	12
The amount of Atmospheric (Air) pollutant propagation	4.48	4.29	5
Employer – Employee Relationship & Employment Laws	2.08	3.69	17
	2.96	3.98	11
	3.20	3.66	12
	4.48	4.29	17
Occupational Health & Safety	4.31	4.21	6
Training & Empowering Employees	2.04	3.73	16
Justice Among employees / working conditions & social support	1.24	3.68	18
Diverse Employees (gender, ethnicity, ...)	1.08	3.00	21
Not Using Working Children	1.75	1.34	23
Not Using Forced (unfree) Labor	1.77	1.44	22
Ethical Business / having Compensation policy & procedures	4.07	3.15	9
Interacting with local community / local recruitment	1.85	3.05	20
Promoting social responsibility in supply chain	3.40	3.16	13
Interacting with local community	2.02	2.97	19
Anti – corruption measures	2.51	3.81	14
Attention to consumers' health	3.31	3.82	10

## Final Matrix of Important Issues Incorporating in stakeholders' priorities & Company Managers







## Social Responsibility executive plan at Nouri Petrochemical Company

In order to ensure that company's business management system leads Nouri Petrochemical Company to corporate sustainability, it defined and implemented ISO 26000 Standard in 2017 in its complex. To illustrate, this approach is in compliance with upstream documents related to strategic planning and organizational excellence system. It should be stated that its outcome is a list of actions and projects, which the organization has to do in different fields with the aim of having a more sustainable and more responsible organization. In fact, commitment, awareness and supporting employees, senior managers and Board of Directors from implementing social responsibility programs and determining direction of the company to a company with social responsibilities are considered as the most important actions of this Complex to stabilize Corporate Sustainability Approach.

For this purpose, Nouri Petrochemical Company has attempted to explain the concept of Corporate Sustainability and its effects for managers and employees working for this company through seminars and workshops, and to determine the scope of Corporate Social Responsibility for employees, as well. Consequently, it identifies employees' opinions, expectations and needs related to implementing Corporate Social Responsibility strategies precisely

by creating appropriate conditions. Moreover, Nouri Petrochemical Company emphasizes on managers' commitment to implementing Corporate Responsibility programs as the most significant factor by which the Company could be successful achieving sustainability during several meetings with managers & employees. So, determining key indexes for controlling and measuring company's movement toward Corporate Sustainability and succeeding in implementing Corporate Social Responsibility are regarded as to be two of the most important activities in reporting Corporate Responsibility, as well. to ensure that Corporate Responsibility Programs are implemented effectively, the company needs to determine measurable indexes with the aim of knowing company's commitment and improvement in this movement. Therefore, measuring and pursuing Corporate Social Responsibility programs could make the company more capable and efficient in achieving its goals. Furthermore, these indexes include all levels of the company from Board of Directors to employees working in different departments in order to increase competitive advantage and create value, commitment and capability of all levels of this Complex could be determined in implementing Corporate Sustainability programs at Nouri Petrochemical Company.

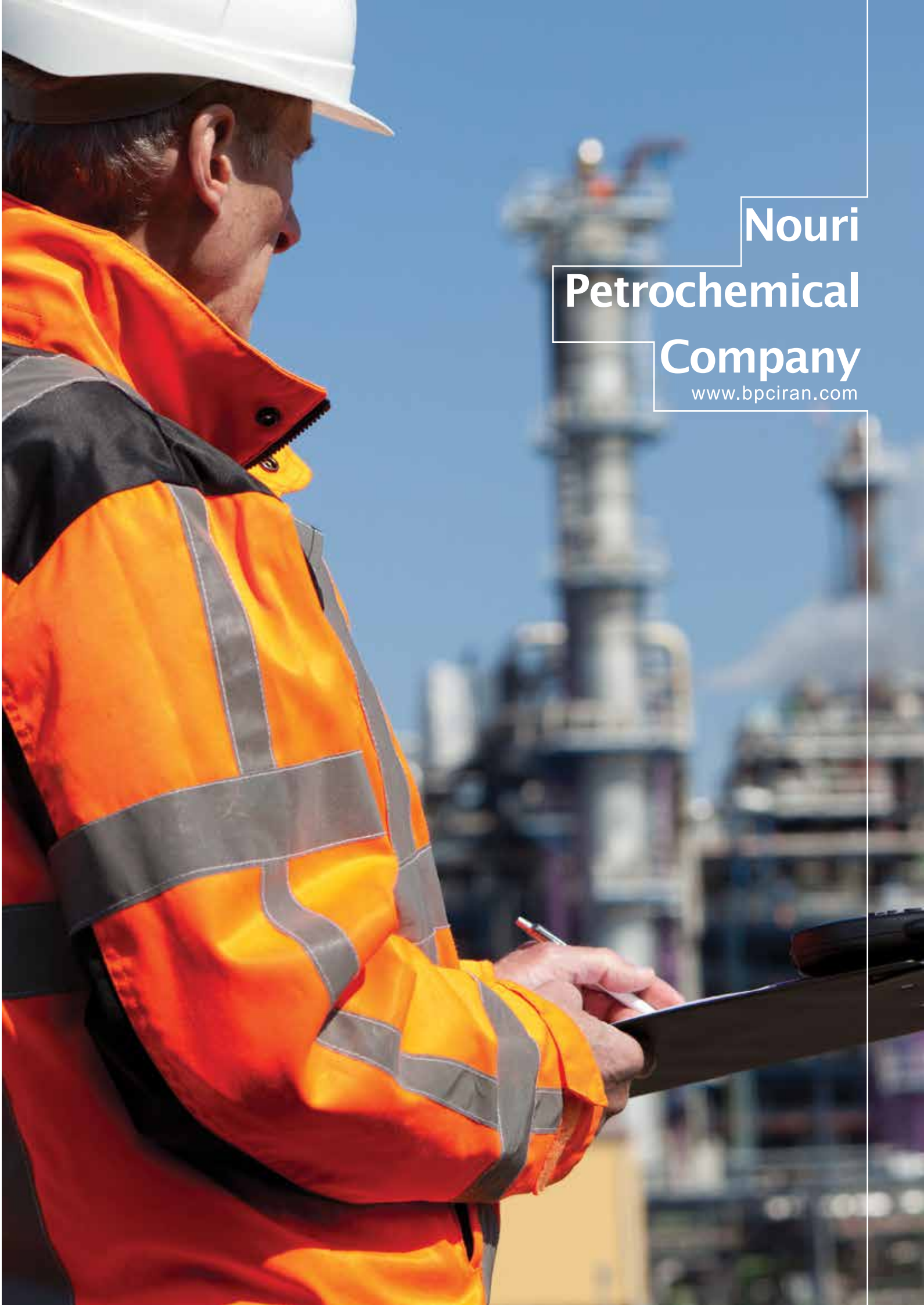
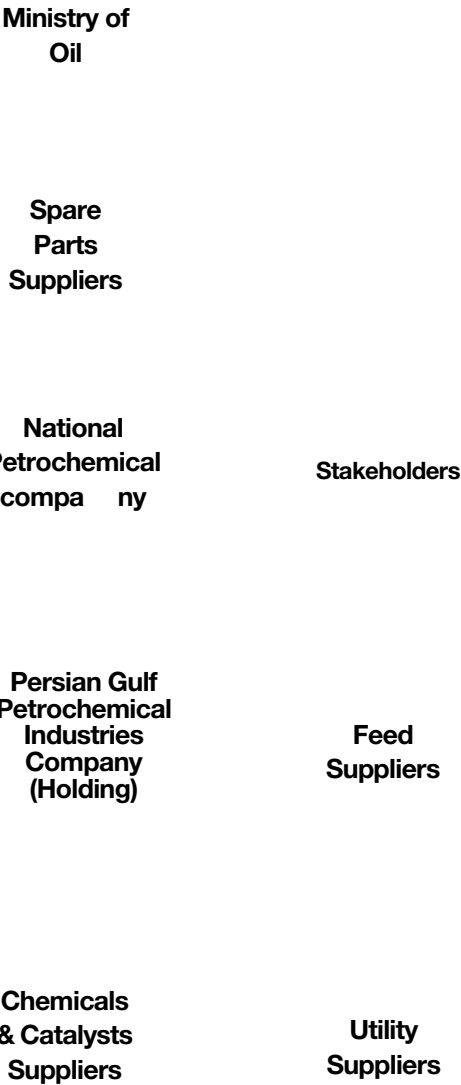
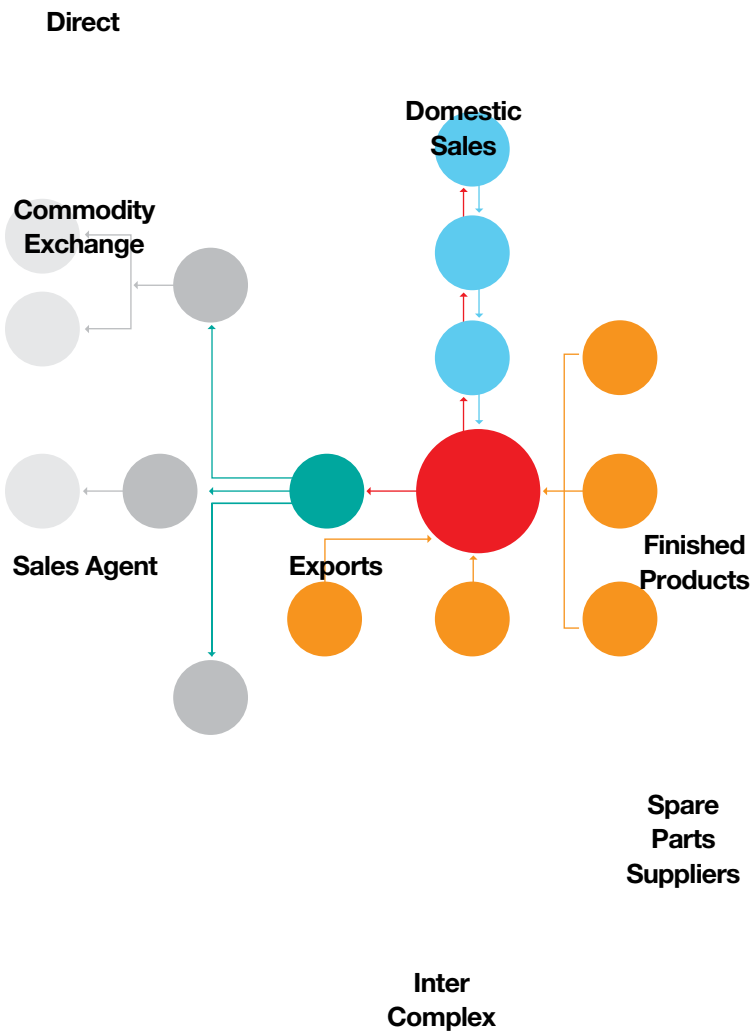
## Table of defined activities related to ISO26000 Corporate Sustainability Project

Material Topics	Defined Activities	Responsible
Creating wealth/economic financial performance/ Corporate Governance	Increasing the volume or percentage of supply by the surrounding community & Assaluyeh	Financial
	Reporting measures & activities done by Companies situated in this area to support creating wealth	Public Relations
	Increasing local recruited employees compared to total recruited employees, if possible	Human Resources
	Reporting impact of our economic performance on Assaluyeh & impact scope	Financial
Transparency/ transparency in presenting financial reports	Reviewing strategies to increase transparency rank in stock and reporting to Corporate Responsibility Index workgroup after being reviewed, for example, ranking below 30 for the first year	Financial
	Compiling an operational calendar presenting to CODAL (Comprehensive Database Of All Listed Companies) to increase transparency in organization	Financial
	Providing GRI Report	Public Relations
	Developing distribution plan for GRI Report among selected stakeholders & receiving feedback	Public Relations
Pollutants/ Atmospheric pollutants/ effects on environment	Reviewing Management Systems such as ISO14000 / Targeting	HSE
	Providing periodic report related to Atmospheric pollutants and leakage management to organization's Corporate Responsibility workgroup	HSE
	Providing quarterly performance report to Corporate Responsibility workgroup	HSE
Resources/ Energy/ Water consumption	Reviewing policy of Energy/ Gas/ targeting corresponding with International Standard, if possible	Energy
	Defining activities related to achieving determined goals I updating Energy Index	Energy
	Providing periodic report on performance & projects related to Energy to Corporate Responsibility workgroup	Energy
	Planning to report other unsustainable resources consumption (water/ electricity power/ feed gas)	Technical Services
stakeholders	Providing organization's Stakeholder Communication Calendar	Public Relations
	Defining & implementing approaches related to communication with stakeholders (defining Communication project)	Public Relations
	Providing periodic report on analyzing & communicating with organization's stakeholders to Corporate Responsibility workgroup	Public Relations
	Conducting community studies with regional CEOs to investigate the effects of petrochemical companies on local communities	Public Relations
	Periodic definition of controlling legal rights of organization's stakeholders	Public Relations
Fair competition/ performance in market of competition & Sales	Clarifying principles of Corporate Responsibility of Nouri Petrochemical Company in Industry Trading Company as a business partner	Sales
	Defining strategy policy & fair sales and adding to organization's documents & website to access	Public Relations
Occupational Health & Safety	Defining Strategy project and Safety & Health approach at Nouri Petrochemical Company	HSE
	Providing periodic report related to indexes & activities to workgroup	HSE
Corporate Governance	Defining a Corporate Governance Project / Board of Directors on Company responsible affairs of the company	Public Relations
Ethical Business	Compiling & revising policy and approving in Board of Directors	Public Relations
	Defining training courses in order for Organization identifies social human resources responsibilities policy & necessity of Ethical Business Booklet	Human Resources
	Developing & compiling Ethical Business Booklet	Public Relations



Identifying & Managing Stakeholders

Nouri Petrochemical Company's Value Chain





## List of Stakeholders at Nouri Petrochemical Company

Category	Stakeholders
Customers	Domestic Customers
	Neighboring Complexes
	Overseas Customers
Employees	Permanent Employees
	Fixed – term contract Employees
	Temporary – term contract Employees
	Contractors' Employees
	Day Laborer
Shareholders	Persian Gulf Petrochemical Industries Company
	Other key shareholders
	Edalat Shares
	Minority Shareholders
	National Iranian Oil Industry Pension Fund
Government & Legal Entities	Environment Protection Organization
	Iranian National Tax Administration
	Social Security Organization
	Audit Organization
	Pars Special Economic Energy Zone
	Inspections Organizations (General Inspection Organization of Iran,...)
	Ministry of Industry, Mine and Trade
	Ministry of Roads & Transportation
	Government & NPC
	Ministry of Health, Treatment & Medical Training
	Institute of Standards
	Anti – Trafficking Organization
	Customs Administration

Category	Stakeholders
Suppliers	Suppliers
	Goods Suppliers
	Technical Services Suppliers
	Feed Suppliers
	Public Services Providers (Suppliers)
	Exclusive Materials & Parts Suppliers
	UTILITY Suppliers
	Firefighting & Safety Services Suppliers
	Training Services Suppliers
	Insurance Associations
Regional Organizations & Relevant	Ports & Maritime Organization
	Banks
	Inspecting Organizations
Others	Charities
	Training Institutes & Trainees Research Centers (Religious Schools & Schools)
	Non – Governmental Organizations (NGOs)
	Residents & Local People
	Indigenous people
	Employees' Families

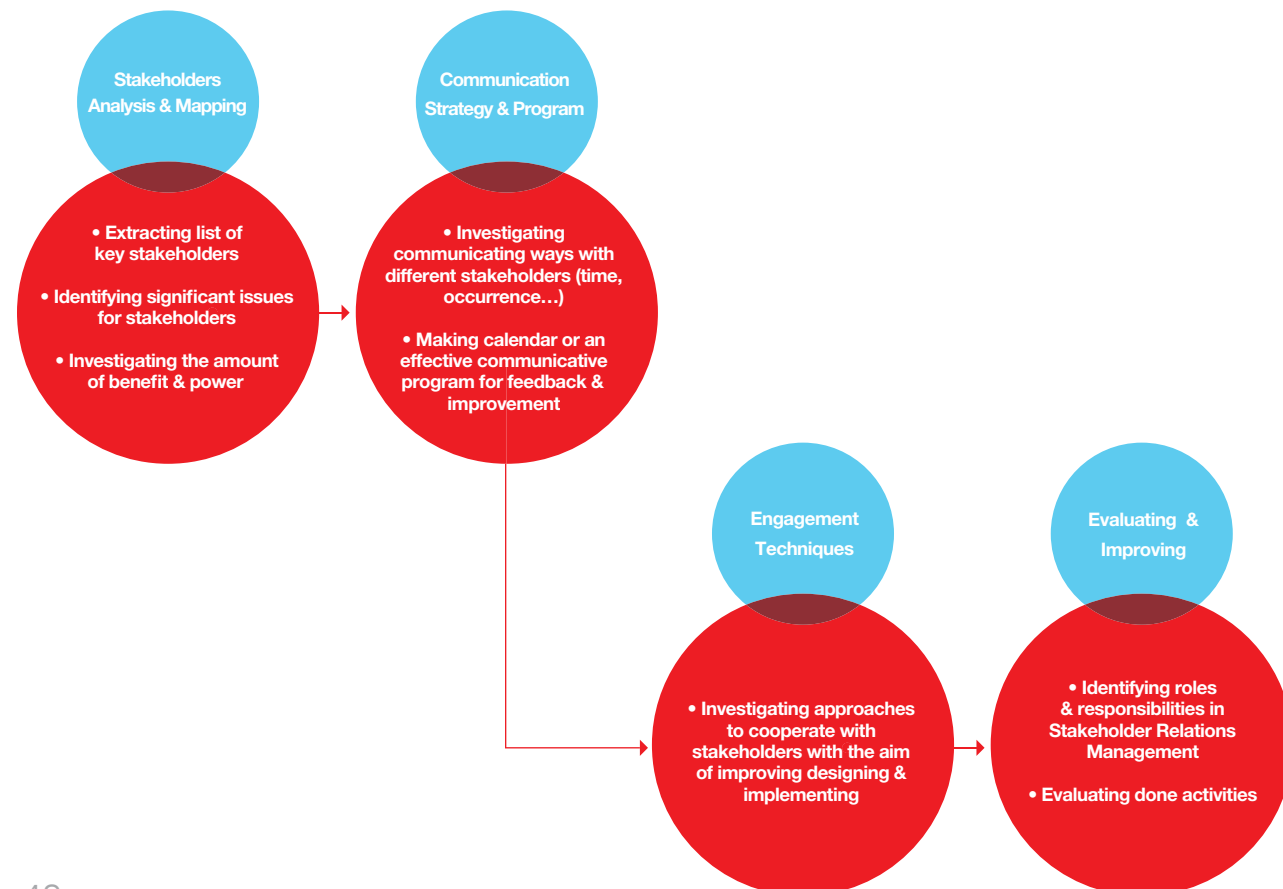


## Stakeholder Management at Nouri Petrochemical Company

Considering those activities hitherto done consistent with Organizational Excellence, Nouri Petrochemical Company is now focusing on responsibility to stakeholders than shareholders. In the other words, Nouri Petrochemical Company's Organizational Culture emphasizes on all stakeholders' priorities to determine strategies and Company profitability not merely focusing on shareholders. In keeping with, managing relationship with stakeholders and meeting their reasonable needs and expectations are regarded as to be the most significant responsibilities of CEOs in this company.

It should be stated that stakeholders' needs and expectations have been identified based on the following diagram and are used as data for compiling company's strategies at Nouri Petrochemical Company. Consequently, these needs and expectations are gathered in the form of "Strategic Planning" through various ways such as meetings, surveys, visits, correspondences, circular letters, legal necessities and governance guidelines and are analyzed and revised in Strategic Council's meetings.

### Nouri Petrochemical Company's approach in categorizing, analyzing and managing stakeholders



## Stakeholder Engagement Approach

There are various Stakeholder Relations Management approaches which are noted in Table 2 considering Nouri Petrochemical Company's conditions. It should be stated that when stakeholders play an important role in the company business conditions are more sustainable, the company manages them directly in communicating with this group of stakeholders. On the other hand, —when those stakeholders that are important to the company but business conditions are not in sustainable conditions, the company takes Stakeholders Engagement Approach so that the common goals with stakeholders would be defined. This strategy requires a mutual commitment between the company and the stakeholder group, which indicates interdependence.

—When stakeholders are important to the company, but fall into the secondary stakeholder group and business conditions are in sustainable situations, managers rely solely on environmental monitoring to control processes and forces to identify and manage potential risks.

—When stakeholders are important to the company and are in the secondary stakeholder group, but the business environment is in an unsustainable environment, managers are more focused on communicating with stakeholders. Also, the company has more flexibility in engaging with this stakeholder group with the aim of going beyond controlling. Moreover, while stakeholders are important to the company and fall into public stakeholders group, and business conditions are sustainable, no particular activities are done by managers.

—When stakeholders are important to the company and are part of public stakeholder group and business environment is not sustainable, managers rely merely on environmental monitoring to investigate processes and forces to recognize and manage possible risks.

**GRI Report of  
Nouri Petrochemical Co.**



## Different Approaches to Communicating with Stakeholders

Stakeholders	Mechanisms of Analyzing Expectations & Needs	Expectations	Way of Identifying Expectations & Needs
Technical Services Suppliers	Contracts, Correspondence & visits	Considering fairness in contracts, clarifying mutual expectations, timely paying statements	Negotiation
Feed Suppliers	Joint Meetings & Correspondence Contracts	Clarifying mutual expectations, timely paying statements, necessary coordination while units are shut down, comprehending technical issues & presenting required solutions	Joint Meetings & Correspondence
Public Services Suppliers	Negotiation & Contracts	Long – term communication, clear expectations, timely paying financial statements, contract with Win – Win attitude (considering fairness)	Performance Status based on statements
UT Suppliers	Constant Meetings, Correspondence, Contracts	Making necessary arrangements, clarifying expectations, necessary coordination while units are shut down, timely paying financial statements, contract with Win – Win attitude (considering fairness), comprehending technical issues & offering required solutions.	Feedback from Meeting Survey
Community	Results from Negotiations, Special Economic Zone, Pazargad Company, Survey, Communication & Meetings with HSE	Observing & preserving Community's ethical and cultural values collaborating, coordinating and helping to solve community's problems, transparency and facilitating access to information	Survey from Community
Oil Industry Pension Fund	Regulations & Circular Letters related to Pension Fund	Timely paying retired employees' shares	New Regulations & Circular Letters
Financial Tribunal	Meetings with Heads	Compliance with legal requirements and related regulations	New Regulations
Auditing Organization	Attending of their representatives in the company	Compliance with legal requirements & related regulations, accounting standards	New legal requirements
Exclusive Materials & Parts Suppliers	Receiving Inquiries, Legal Requirements, Circular Letters & Regulations	Timely paying statements, clarifying mutual expectations, considering fairness in contracts, improving activities	Meetings, new Regulations & Circular Letters
Main Shareholders	General Meeting's responsibilities, General Meeting's minutes, Persian Gulf Petrochemical Industries Company (Holding)'s minutes	Sustainable profitability, making well-timed, accurate & transparent reports, budget management based on new & cost-effective investing budget	New Approved & Announcements
Inter – complex Customers	Joint Meetings with Jam & Pars Petrochemical Companies, Surveys Joint Meetings with Jam & Pars Petrochemical Companies, Surveys	Acting on a contract for feed supply, a necessary commitment to timely feed supply, well – timed paying financial statements, required coordination while units are shut down & feed cutoff	Contracts, Joint Meetings

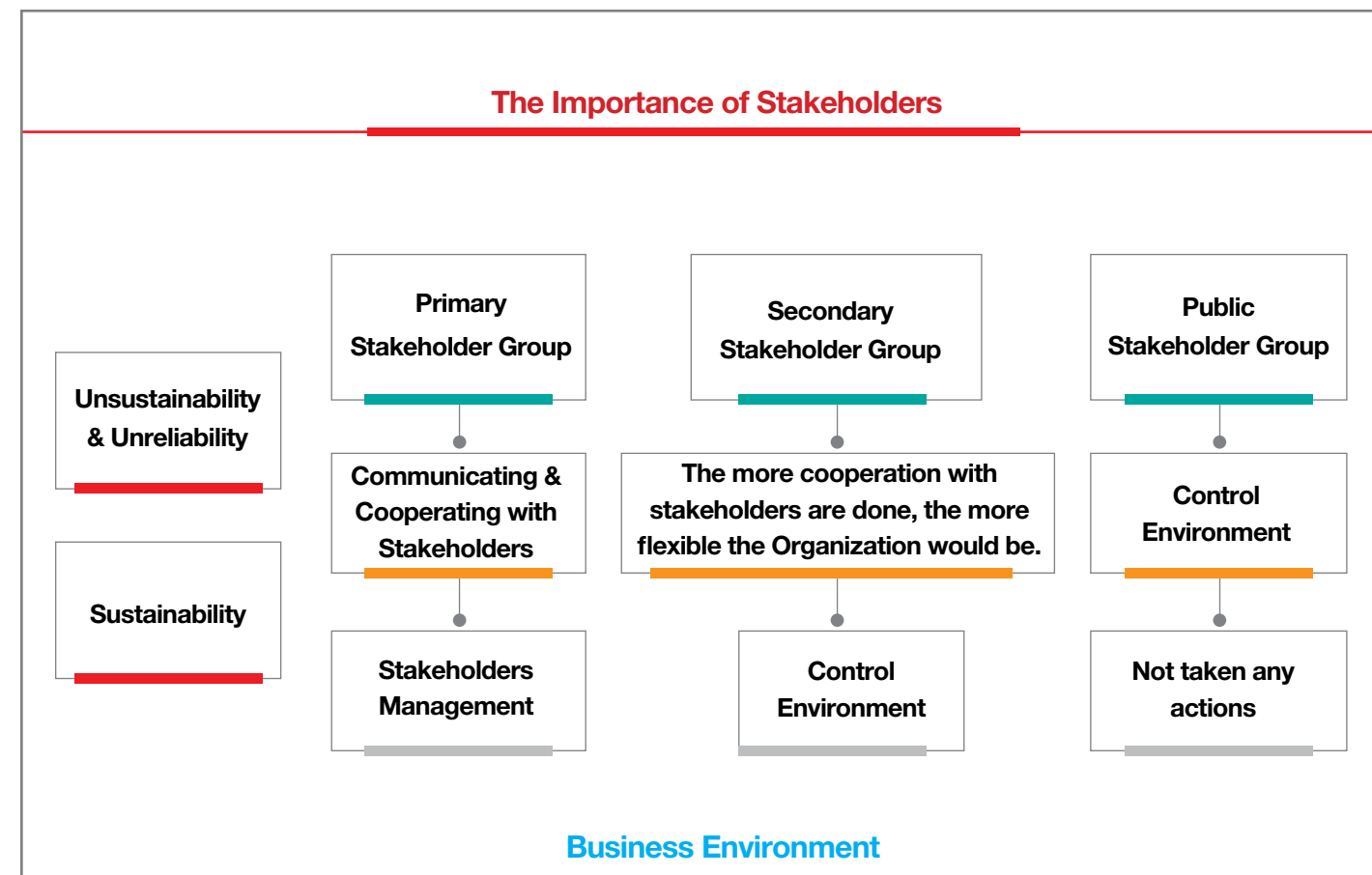


## Different Approaches to Communicating with Stakeholders

Domestic Costumers	Customers Feedback form through Email, website, constant meetings with Industry Trading Company	Adapting products to technical specifications, having required accuracy in weighing products, timely delivery, product insurance, technical training related to products, experts with technical skills & knowledge, reasonable prices, changes process and adjusting to market fee, sending technical properties, safety data, and loading sheets with products, continuous relation with customers, variation in sales procedures, Rapid Complaints Handling, variety in available products	Customer's Feedback
Overseas Customers	Constant meetings with Industry Trading Company	Timely delivery of shipment documents to customers, flexibility in specific products delivery 2000 Incoterms, flexibility in customer payment, acceptable & reliable quality, warranty provision, introduction to Stock Exchange & how to purchase it, appropriate pricing, product variety, Foreign products insurance, After Sales Service	Meeting Minutes
Government & NPC	General Meetings & Official Meetings with CEO, Circular of Letters, Announcements issued by Social Security Organization & Ministry of Economic Affairs and Finance	Compliance with Governmental Laws & Regulations, Cooperation with other State Petrochemical Companies along with Major Governmental Policies	New Circular of Letters, Announcements & Requirements
Department of Environment	Meetings, Correspondence & Circular of Meetings	Compliance with Environmental Laws & Regulations, developing green spaces in operational environments, participating in environmental culture promotion and seminars	New Circular of Letters & Requirements

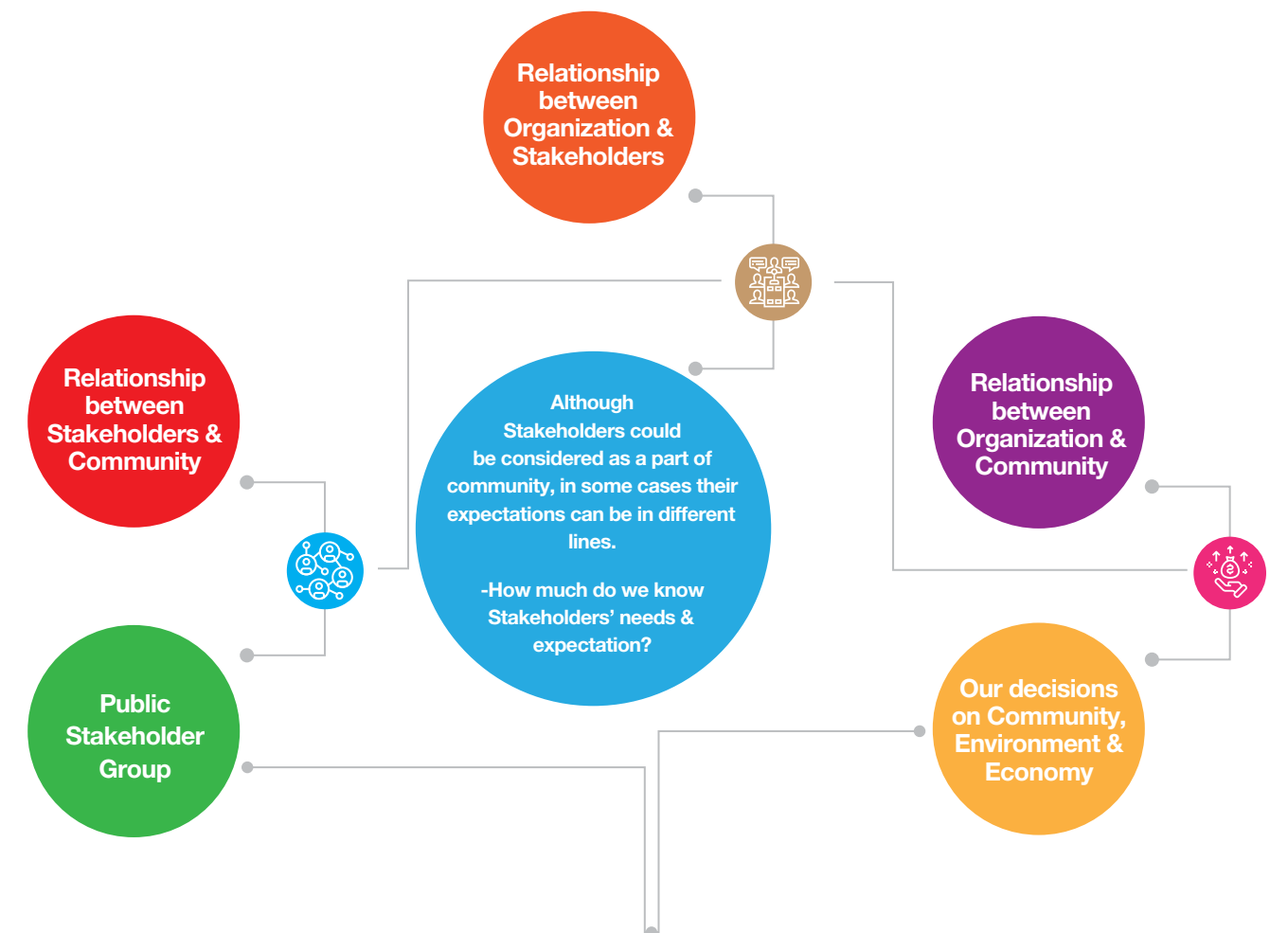


## Stakeholder Relations Management



The entry of Nouri Petrochemical Company into Over – the – Counter (OTC) Market could be considered as one of the influential events in strengthening Stakeholder Approach. Then, the following activities could be regarded as to be those activities done by Nouri Petrochemical Company with the purpose of Stakeholder Approach; effort for implementing Organizational Excellence Model (EFQM) with the aim of providing a framework for organizational improvements and moving from islanded activities related to different stakeholders to regular programs associated with them, receiving stakeholders' expectations & opinions and monitoring received

feedbacks from them and finally compiling Corporate Strategies on the basis of creating balanced benefits for the company and its key stakeholders. Moreover, considering different stakeholders' expectations and needs in making decisions & Corporate Management processes, systematic regulations through a wide range of cooperating with community, business environment and stakeholders could be resulted in transparency in accountability and actively going beyond standards & legal requirements at Nouri Petrochemical Company.



- Relationship between Nouri Petrochemical Company and Stakeholders
- Extracting lists, Categorizing & Interviewing with Organization's Stakeholders
- Relationship between Nouri Petrochemical Company and Community:
  - Defining Community as Sphere of Influence, categorizing negative outputs & influential issues
  - Relationship between Community and Stakeholders
  - There is no conflict of interest in this regard with the current definition of Community.



## Cooperation & The Importance of Stakeholders

Identifying those issues which are related to the seven key topics in sustainability is considered as an effective way to determine social responsibility for Nouri Petrochemical Company. Those issues are as follows;

**1.Organizational Governance:** issues related to ways of corporate decision making & macro – organizational decision – making, as well as relationship among shareholders, as one of the most important stakeholders of the company (with managers & Board of Directors).

**2.Citizenship Rights:** in addition to civil rights, Citizenship rights also applies to social, economic and cultural rights. These entitlements include the right to work, food, access to the highest possible level of education, and health.

**3.Workforce (Labor force):** is considered as employment & work relationships among workers and employers, general conditions of work and the amount of social support that employers provide to employees, as well as employees' health & safety, human development and training sources.

**4.Environment:** issues such as pollution prevention, sustainable use of available resources, the degree of susceptibility of the organization to severe climate change and its modification, biodiversity & environmental protection.

**5.Business:** which is related to how to combat corruption in the organization, fair competition, promoting social responsibility in support chain and so on.

**6.Consumers:** issues related to ethical & fair marketing, supporting consumers' safety & health, sustainable use, customers' services and handling their complaints (Grievance procedures), protecting customers' information and their privacy and finally training and informing them.

**7.Local Communities Development:** issues such as help to develop these communities, culture, training and so on.

In keeping with stakeholder – based view, on the basis of global patterns of corporate sustainability, a complete list of stakeholder groups was made. It should be noted that stakeholders' expectations and their important issues were determined through interviews, surveys and group meetings for both stakeholders and the company. Moreover, interaction patterns among stakeholders are considered dynamic and constantly evolving due to economic, social and legal developments. In the other words, stakeholders of company are not constant and would change based on major economic changes and the company.

## Nouri Petrochemical Company's Approach to its Stakeholders

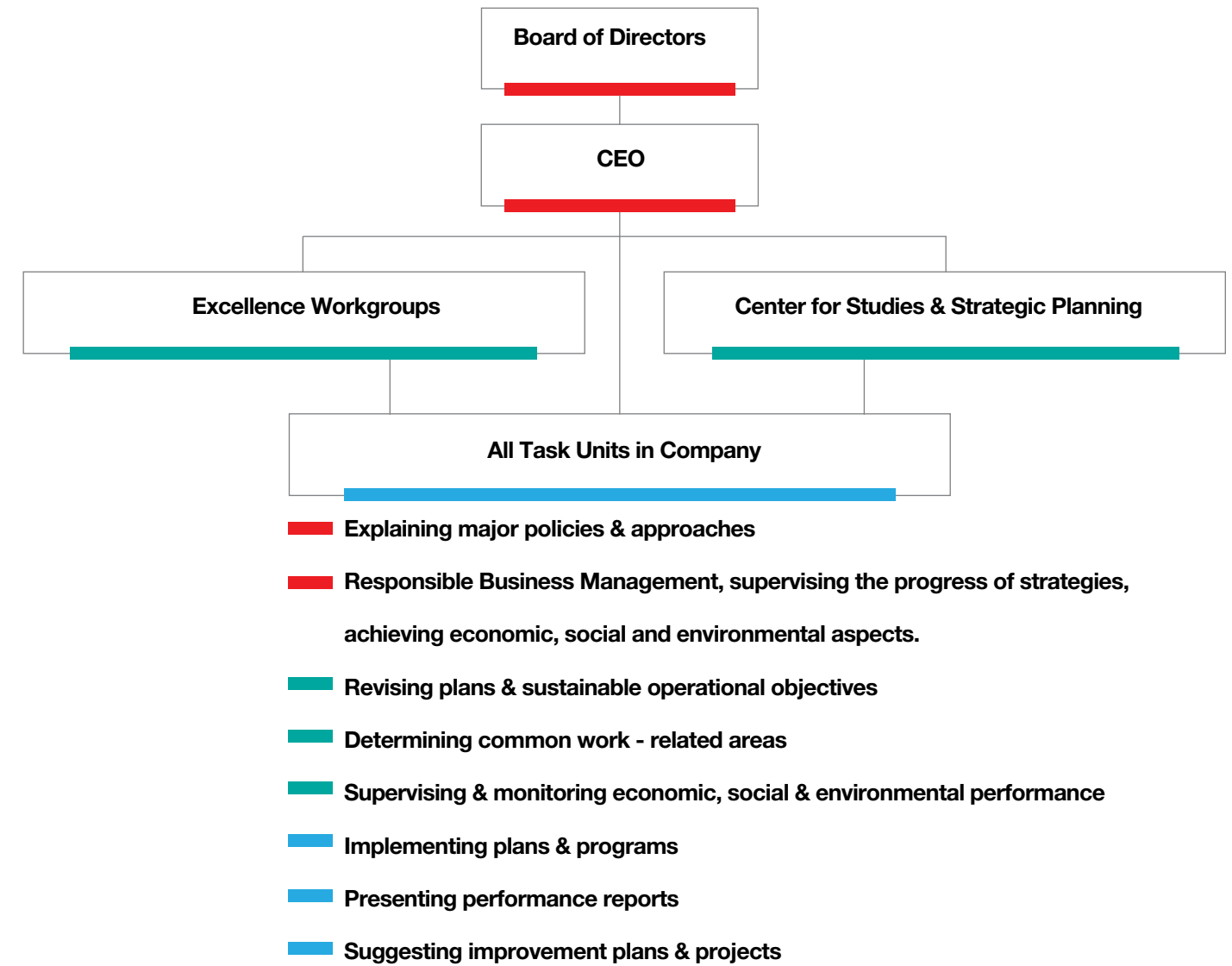
Category	Stakeholder	Approach
Customers	Domestic Customers	Informing
	Neighboring Complexes	To be managed
	Overseas Customers	To be managed
Employees	Permanent Employees	To be managed
	Fixed – term contract Employees	To be managed
	Temporary Employees	To be managed
	Contractors	Informing
	Day rate Employees	Minimum Monitoring
Shareholders	Persian Gulf Petrochemical Industries Company	To be managed
	Other key shareholders	Informing
	Edalat Shares	Minimal Monitoring
	Minority Shareholders	Minimal Monitoring
	National Iranian Oil Industry Pension Fund	Minimal Monitoring
Government & Legal Entities	Environment Protection Organization	To be made satisfied
	Iranian National Tax Administration	To be made satisfied
	Social Security Organization	Minimal Monitoring
	Ministry of Cooperatives, Labor and Social Welfare	Minimal Monitoring
	Audit Organization	Minimal Monitoring
	Pars Special Economic Energy Zone	Minimal Monitoring
	Ministry of Industry, Mine and Trade	Minimal Monitoring
	Ministry of Roads & Transportation	Minimal Monitoring
	Government & NPC	To be made satisfied
	Ministry of Health, Treatment & Medical Training	Minimal Monitoring
	Institute of Standards	Minimal Monitoring
	Anti – Trafficking Organization	Minimal Monitoring
	Customs	To be made satisfied



### Nouri Petrochemical Company's Approach to its Stakeholders

Category	Stakeholder	Approach
Suppliers	Contracting Services Suppliers	To be managed
	Goods Suppliers	To be managed
	Technical Services Suppliers	To be managed
	Feed Suppliers	To be managed
	Public Services Providers (Suppliers)	Minimal monitoring
	Exclusive Materials & Parts Suppliers	To be made satisfied
	UTILITY Suppliers	To be managed
	Firefighting & Safety Services Suppliers	To be made satisfied
	Training Services Suppliers	Minimal monitoring
Regional & Relevant Organizations	Insurance Associations	Minimal monitoring
	Ports & Maritime Organization	To be made satisfied
	Banks	Minimal monitoring
	Inspecting Organizations	Minimal monitoring
Others	Charities	Minimal monitoring
	Training Institutes & Trainees Research Centers (Religious Schools & Schools)	Minimal monitoring
	Non – Governmental Organizations (NGOs)	
	Residents & Local People	Informing
	Local people	Informing
Competitors	Employees' Families	Informing
	Competitors	To be managed

### Corporate Governance



### Organizing Responsible Business Management

Nouri Petrochemical Company, as a joint – stock company, was established in 2007. This company was initially regarded as to be a subsidiary company of the National Iranian Petrochemical Company, which was transferred to Persian Gulf Holding Company in 2009 in accordance with Article 44 of privatization policies.

This company is currently preparing to enter the stock market, which has its own legal & governance requirements. Presently, Nouri Petrochemical Company is considered as a part of the commercial units of Persian Gulf Petrochemical Industries Company

(public corporation). The headquarters of this company is located in Pars Special Energy Economic Zone in Assaluyeh.

Nouri Petrochemical Company's organizational chart in sufpainadilipy and excellnce matters is shown above. Board of Directors consists of five ipeople and has one layer. Two of this structure has executive responsibility. On the basis of governance corporate principles, those structures which assist in decision – making and supervision structures in organization have been defined and executed based on rules & regulations. However, Board Committees are restricted to Audit Committees. It should be stated that there are no other Committees such as Appointments Committees,



## Legal Structure of Nouri Petrochemical Company

From the beginning of establishing this company, its capital is

three trillion rials (3000 trillion rials) including three trillion shares at par value of 1000 rials by the end of 2016. Moreover, shareholders having more than 5% of company's shares at the end of fiscal year ending November 8, 2016 are shown in the following table:

### Shareholders

No.	Shareholders	Nov. 11. 2018		Feb. 2. 2017			
		Number of Shares	Percentage	Number of Shares	Percentage	Number of Shares	Percentage
1	Persian Gulf Petrochemical Industries Company	2296496000	76.55	2296496000	76.55	2296496000	76.55
2	Oil & Gas & Petrochemical Investment Company TAMIN	509999000	17	509999000	17	509999000	17
3	The National Pension Fund Investment Company	193500000	6.45	193500000	6.45	193500000	6.45
4	Others (less than 5%)	5000	-	5000	-	5000	-
Total		3000000000	100	3000000000	100	3000000000	100

## Structure & Composition of Board of Directors

Like other organizations, members of Board of Directors are selected at Nouri Petrochemical Company on the basis of shareholders' opinions. It is obvious that selecting these members are principally effected by main policies of major shareholders. It should be stated that these members are experienced and expert at Petrochemical, Gas & Oil Industry and they have

mastered financial affairs and main organizational strategies. Moreover, average tenure of Board of Directors is two years. The percentage of presents in Board of Directors meetings are based on Business Law and the numbers of permanent and board absentee members are documented in each meeting.

### Board of Directors at Nouri Petrochemical Company

Name	Position	On behalf of	Executive or Non-executive Member
Hakim Karami	Chairman of the Board	Mobin Petrochemical Company	Non-executive
Taghi Saneie	CEO & Vice Chairman of the Board	Persian Gulf Petrochemical Industries Company	Executive
Mohammad Heydari	Member of the Board	Bandar Imam Petrochemical Company	Non-executive
Seyed Farhang Hosseini	Member of the Board	Petrochemical Industry Development Management Company	Non-executive
Mohammad Reza Pashae	Member of the Board	Oil & Gas & Petrochemical Investment Company TAMIN	Non-executive



## Board of Directors Explanation

A) **Specialized Committees of the Board of Directors:** As Nouri Petrochemical Company is entering the stock market in accordance with the requirements of Stock Exchange, Internal Audit Committee has been formed. Furthermore, other committees which assist Board of Directors in making decisions are Internal Audit Committee, Product Sales Committee, Exchange Committee, Budget Committee and Transactions Committee.

B) **Conflict of Interest of Board Members:** Nouri Petrochemical Company have clear procedures regarding the conflict of interest of board members. According to Article 129 of Business Law, Board of Directors is required to formally disclose any conflict of interest with the Company through business activities. On the other hand, in formal voting at Board meetings, if there is a conflict of interest, Board member who is involved in, does not vote.

C) **Corporate Sustainability & Board of Directors:** Considering implementing ISO 26000 project and compiling activities related to Corporate Sustainability, it was determined that issues are referred to Board members with the aim of controlling every six months. In addition to the organization's performance in relation to social responsibility strategies (a list of defined responsibility actions), Board of Directors are updated relating to important Corporate issues (matrix materiality), and how to extract it, as well as budgeting and costing associated with responsible actions. The first meeting related to social responsibility and Corporate Sustainability was held in 2016.

D) **Compensation for Board Members:** Employees get paid on the basis of laws & regulations determined by Oil Industry and Social Security Organization. Moreover, Board of Directors' remuneration shall be approved in accordance with the rules at the end of each year at the annual general meeting of Nouri Petrochemical Company.



## Social Responsibility Committee at Nouri Petrochemical Company

— Social Responsibility Committee at Nouri Petrochemical Company is responsible for increasing cooperation in responsible activities as well as supervising planning and implementing such activities.

Important duties of this Committee are as follows;

— 1. Supervising planning responsible activities at Nouri Petrochemical Company based on following principles:

- Focusing on stakeholders & sustainability
- Focusing on material issues

— 2. Supervising how determined social responsibilities activities are implemented and periodically monitoring relevant indicators.

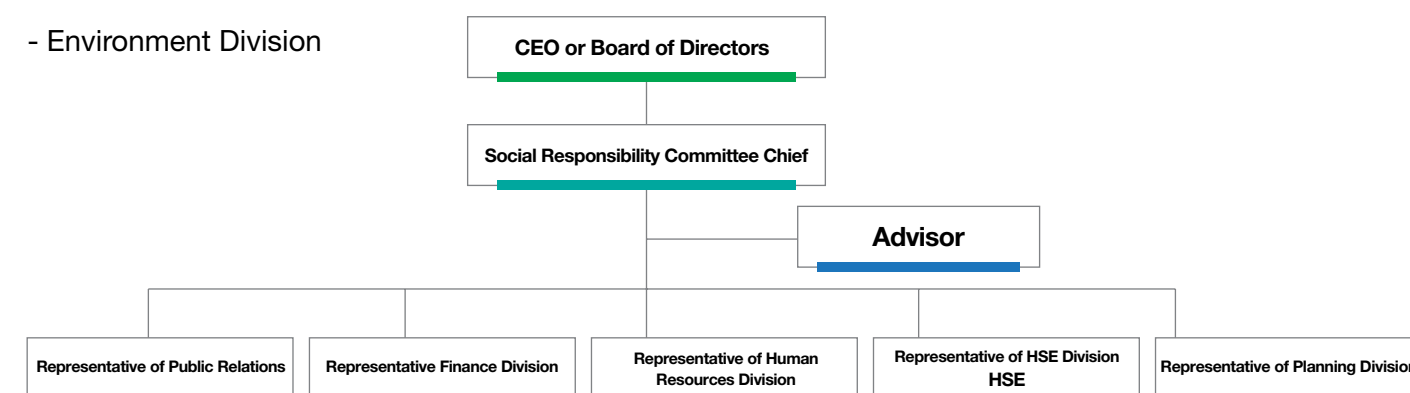
— 3. Supervising how reports on responsible activities done at Nouri Petrochemical Company are made.

— 4. Supervising corporate social responsibility discourse through defining of training activities

According to organizational chart at Nouri Petrochemical Company, Social Responsibility Committee has one member from the following departments;

- Management & Board of Directors
- Management Planning & Quality Assurance
- Finance Division
- Public Relations
- Human Resources
- Environment Division

It should be noted that members of Social Responsibility Committee are appointed based on suggestion made by Committee Director and confirmed by CEO for two years. Each member is responsible for all defined activities in social responsibilities in his / her department. Moreover, members should report Committee on progress and quality of done activities. Social Responsibility Committee is directly accountable to CEO of the company, but in discussing budgeting and defining programs, committee approvals are subject to confirming by Board of Directors. In addition, time of holding Social Responsibility Committee's meetings is at least once a month. Committee Director is also in charge of informing meeting schedule to the members of this committee.





## Professional Ethics

### Codes of Ethics & Principles of Business Ethics

Nouri Petrochemical Company is committed to creating maximum value for all its stakeholders, particularly shareholders in all aspects of its business including operations and support activities using a responsible approach and a long – term perspective of sustainable business. As a matter of fact, all processes were defined on the basis on responsible policies. Moreover, at Nouri Petrochemical Company, managers make their decisions and take them into consideration regarding responsible & ethical business. They also make sure that whether or not all structures which define, determine and monitor issues related to responsible business.

Managers improve performance of organization and economic, social & environmental conditions in those communities which are related to them simultaneously. So, they could have a positive impact on their surroundings. It should be noted that on the basis of “Social Responsibility” Approach, appropriate activities have been done with the aim of balancing between legal requirements and expectations of the community, environment and people in the organization.

Code of Business Ethics was provided and compiled at Nouri Petrochemical Company and finally was approved in Corporate Strategic Council which consists of CEO and all managers of the company. According to this, it has been attempted to define principles of Business Approaches. It should be stated that this Code of Business Ethics is being implemented in organization and people, who engaged with processes in organization, are being trained.

The Code of Business Ethics would help employees at Nouri Petrochemical Company in all areas including Corporate Governance, Business Ethics, Accountability and Transparency, and even executive affairs, and to find responses to their questions on how to act ethically. At least knowing which source they should seek help from in case there would be any uncertainties







Management & Performance of  
Economic Responsibilities at  
Nouri Petrochemical Company



## Review of Economic Responsibilities at Nouri Petrochemical Company in 1396 SH

Economic Value Generated & Distributed	
Corporate Capital	3000 billion rials
Number of Employees	1179 people
Accumulated Earnings & Profits at the end of period	20,870,766 million rials
Net profit per share	5114 rials
Sales of products & services	91,057,961 million rials

## Productive Performance at Nouri Petrochemical Company in 1396 SH

Products	Actual Production Amount (ton)	Actual Sales Amount (ton)
	Fiscal Year 2017	Fiscal Year 2017
Para – xylene	366,184	364,740
Ortho – Xylene	46,386	41,254
Gasoline	278,479	270,658
Liquid Gas	107,446	108,236
Raffinate	342,048	323,932
Light Cut	964,744	967,664
Heavy Cut	1,553,701	1,563,828
A92	64,502	83,037
Heavy Aromatics	44,941	35,865
C5	49,477	49,338
Naphtha	613,419	615,540
Total	4,431,327	4,424,091

## • Internal & External Consumption of Company Products

product	2018.3.20 Fiscal Year Ending on		2017.3.20 Fiscal Year Ending on		2016.3.19 Fiscal Year Ending on	
	company's market share		company's market share		company's market share	
	Internalshare	External	Internalshare	External	Internalshare	External
	Million to Rial	Million to Rial	Million to Rial	Million to Rial	Million to Rial	Million to Rial
Para –xylene	10,083,135	1,213,578	5,766,913	8,612,324	462,442	11,814,898
Ortho–Xylene	1,141,818		1,068,464	213,450	528,036	349,774
Benzene	6,782,686		7,151,235		4,992,189	736,572
Liquid Gas	1,604,009		1,671,429		1,356,429	
Raffinate	85,881	6,162,845	165,445	7,014,938	161,595	5,150,503
Light Cut	14,848,733		11,920,526		9,813,366	
Heavy Cut		32,632,067	147,971	27,231,745	368,087	20,999,067
A92		2,463,676				
Heavy Aromatics	621,970		499,042		290,421	
C5	797,908		6921,953		598,804	
Naphtha		12,619,655		5,316,481		2,719,882
Total	35,966,140	550,091,821	29,083,978	48,388,938	18,571,369	41,770,696



107%

99%

10%

25%

1/ 00/000/000

#### Review of Nouri Petrochemical Company's Performance in 2017

- Achieving a 107 percent Production Record for Products Plan
- Achieving 99 percent of Nominal Production Capacity
- 10 percent of Petrochemical Industry Productions in the Country
- 25 percent of Persian Gulf Petrochemical Industries Holding Productions
- 1.3 billion in Exporting

## Sustainability Report Nouri Petrochemical Co.

### • Contributing to a Healthy and Transparent Economy

#### A. Anti – Money Laundering

Considering Anti – Money Laundering at Nouri Petrochemical Company, the following activities are being applied in the company in framework of an executive order to Anti – Money Laundering at Business Enterprises and Nonbusiness Organizations;

#### B. Obtaining necessary documents from clients to organize file & paperwork

In all send invoices, receipts and contracts, information such as national ID for legal entities, national number, address and postal code for natural persons are required to be considered.

#### C. Training & Empowering Employees and Optimizing Intra – Organizational Mechanisms

Employees working in Administrative, financial, business, legal affairs & contracts departments and directors have passed elementary & advanced training courses on Anti – Money Laundering Law and obtained certificated of the above – mentioned courses. along with Anti-Money Laundering Committee has been set up with members of the Internal Audit, Financial, Legal, Business and Security Divisions.

#### D. Using Independent Auditors & Cooperating closely with Them

It has been cooperated with Independent Auditors firmly. Also, it should be possible for someone who is responsible for Anti – Money Laundering to access customers and clients' information files and financial system.

#### E. Operational Activities & Provisions of Contracts

Finally, the Anti-Money Laundering Officer receives and applies the latest relevant information and trainings by visiting the Secretariat of the Supreme Anti-Money Laundering Council. In keeping with implementing the above instruction, commitment form on Anti – Money Laundering Law has been prepared and attached to all contracts in order for contractors to make their firm commitment on this issue.

#### F. Transparent & Accountable Financial Management

All financial activities at Nouri Petrochemical Company are controlled and recorded in accordance with financial governance processes and at all relevant organizational levels. In order to apply this approach, several regulations, circular letters, instructions and rules such as Budget Operating Instructions & Regulations, Transaction Regulations, Accounting & Auditing Standards, Resolutions approved by Board of Directors at Nouri Petrochemical Company, Persian Gulf Petrochemical Industries Company & Ministry of Oil are being codified and used at all financial process levels to comply with events which have financial impact and dimensions. Moreover, financial supervision of Nouri Petrochemical Company is also carried out on a continuous basis using activities such as budget control, property control, documenting of all of financial & insurance auditing documents and tax auditing. It should be noted that information related to organizations such as such as Computing & Inspectorate Court of the country is sent based on process and enquires.

Annual Audit is done by auditors and statutory auditors with the aim of investigating Corporate Financial Performance and commenting on the acceptability of financial statements within the framework of accounting standards, auditing, reporting to Annual General Meeting provided by Board of Directors and enhancing the scope of internal audit activity is regarded as to be one of Corporate Financial Governance's roles. Implementing the effective internal controls to achieve an acceptable level of financial risks is considered one of issues related to Corporate Governance. According to the improvements in financial process with a transparent approach to financial performance reporting and the lack of discrepancies in activities, in independent Petrochemical Company's auditing process over many years has provided auditor's opinion that financial statements are in compliance with accounting standards has been desirable.



## Customers

Improving stakeholders' satisfaction is regarded as to be one of the strategic objectives at Nouri Petrochemical Company. In this regard, this company always attempts to involve in mutual success by developing constructive, innovative and win – win relationship with customers. To explain, Nouri Petrochemical Company has always stayed in contact with their customers using a variety of methods such as periodic surveys, in – person meetings, organizational correspondence, participating in associations, workgroups and their opinions are highly important to this company. Such activities are pursued at various levels, from organizational managers to responsible experts in relevant units, such as Sales Office, Quality Assurance Office and Public Relations. Moreover, the results of continuous communication with customers are stated and decisions required for meeting customers' needs and expectations are made based on problem – solving based approach in management review meetings.

As a matter of fact, the nature of activities and products at Nouri Petrochemical Company made the quality and quantity of corporate's performance has led to a direct impact on customers' capability, especially effective management in their business. One of the most important issues related to this field is that despite the exclusivity of offering Nouri Petrochemical Company's products and services in this region, it has always attempted to avoid monopolistic attitudes. In the field of product pricing, there has always been a close relationship between Nouri Petrochemical Company, Petrochemical Industry Association and customers. On the other hand, the company has always embraced exchanging knowledge and experiences as well as creating technical adaptations to its determined customers' relationship. According to the type of business and manufacturing products, Nouri Petrochemical Company's customers are as follows;

- Overseas Customers
- Domestic Customers
- Inter – Complex Customers

In this company, with the purpose of obtaining feedback from customers, annual surveys are conducted twice a year at 6 month intervals. Subsequently, the results are discussed in Management Review Meetings. If needed, the current approaches are improved. As the value offered to the customers at Nouri Petrochemical Company is “providing high – quality products with reasonable price, high capacity (tonnage) and being delivered in the shortest time”, so, it has been attempted to find out customers' opinions on how to deliver manufactured products and their quality & quantity as well as measure customers' loyalty.

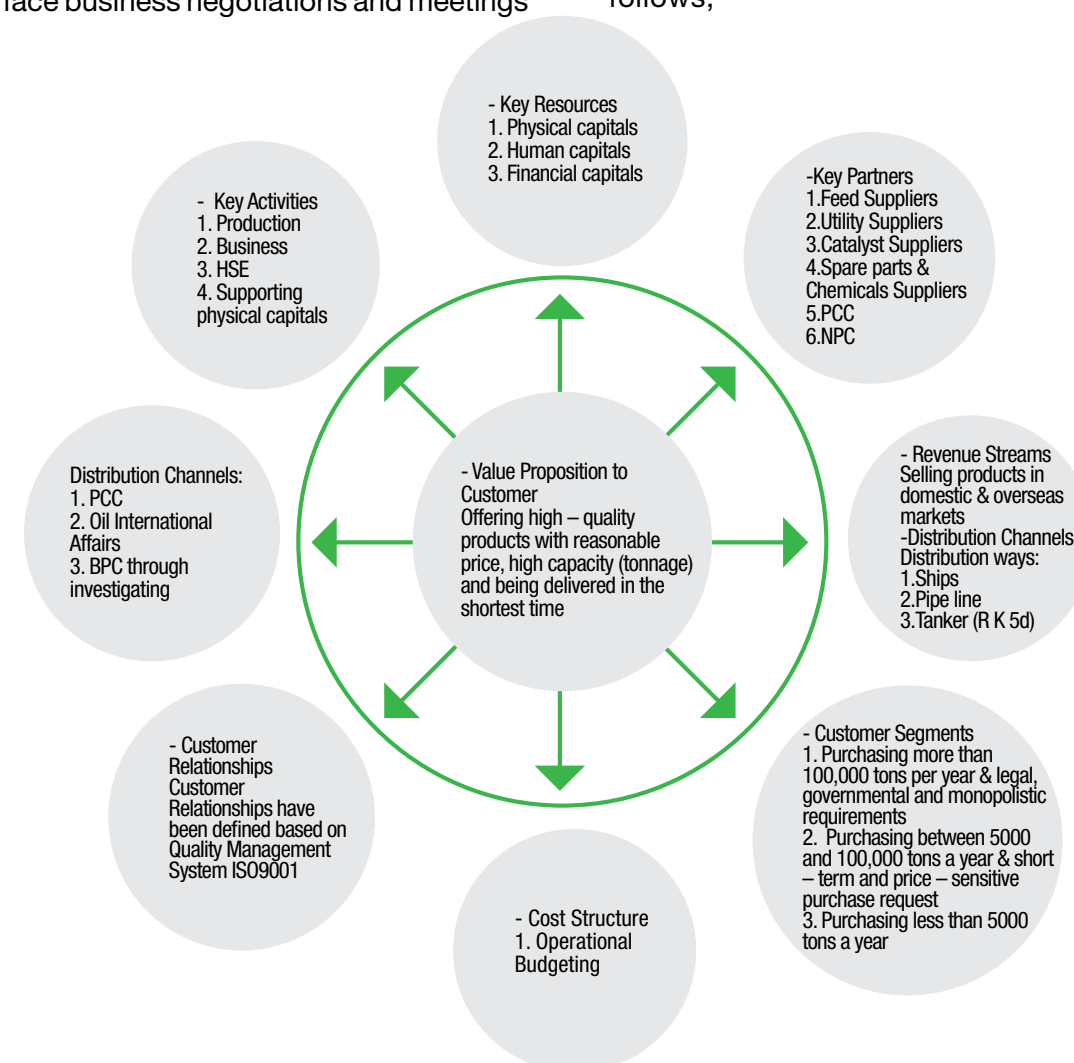
In this company, according to the type of business which is mainly B2B, customers could be

divided into two groups of overseas and domestic customers based on geographic segmentation. It should be stated that domestic customers could be in two groups of inter – complex & exchange customers. On the basis of geography, overseas customers include five parts. Sales Unit has been developed in terms of number of people with the aim of carrying out Customer Relationship Process (CRP). To explain, this unit, supervised by business management, directs Customer Relationship Process (CRP) through meetings and surveys. Since 2009, “Survey Approach” has been taken with the intention of managing mutual interactions with customers effectively by Nouri Petrochemical Company which is one of the organization's strategies consisting of “increasing export sales & revenue” relating to stakeholders.

It should be stated that this activity is in relation to other processes in the company such as “Customer Relationship Process” and the results obtained from periodic monitoring could be used to assess and improve effectiveness. Moreover, in various segments of the market, selecting sales agent, making annual contracts with them, obligating corporate's representatives to attend face – to – face business negotiations and meetings

with customers and offering value package to them have been done by Nouri Petrochemical Company.

Indicators related to “Customer Relationship Process” are as follows; “number of corrective actions to meet customers' requirements”, “effectiveness of organizational communication channels”, “number of customers' complaints” and “customers' loyalty” which are monitored and measured on a regular basis and the obtained results assessed and analyzed, subsequently are discussed in management review meetings to take appropriate approaches. Considering company's vision, mission and strategies, Nouri Petrochemical Company compiled its Business Model through studying and using Oster Walder. On the basis of Oster Walder, Nouri Petrochemical Company's Business Model consists of 9 elements. As it could be seen in the model, value proposition is in its center which is offered to customers based on the nature of B2B of company's business by Nouri Petrochemical Company. In addition to value proposition as a core of the model, eight other elements support the organization to achieve value proposition. The concept of these nine building blocks of model and their performance are as follows;



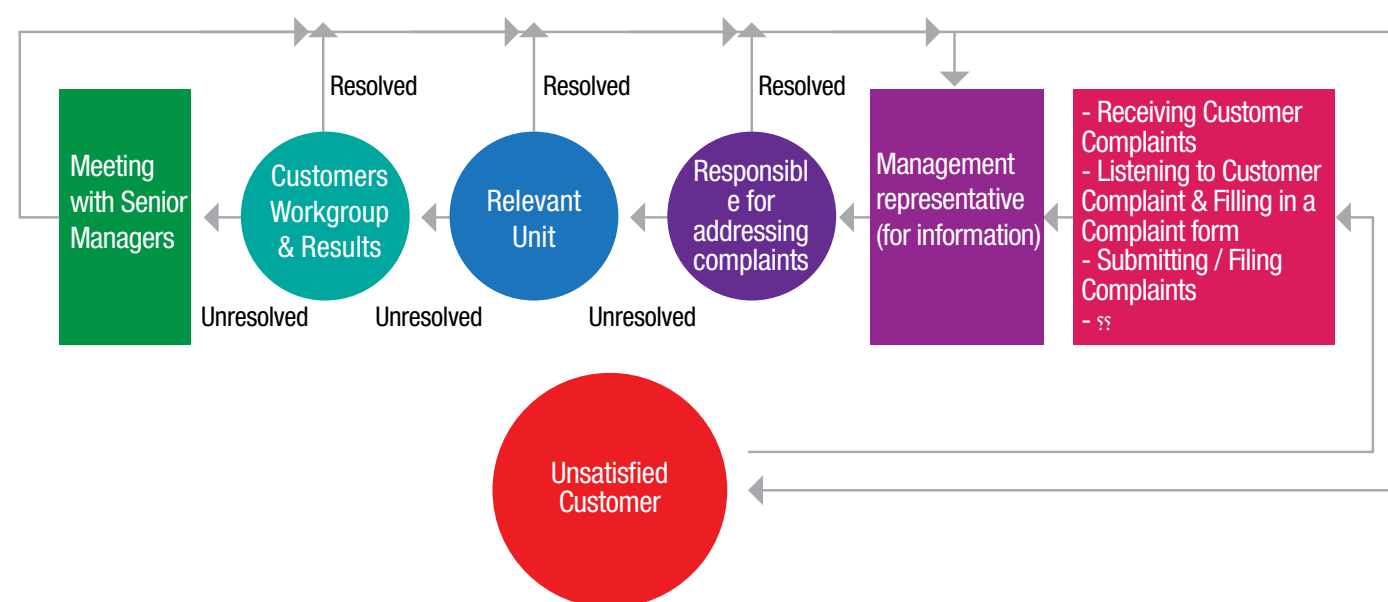


According to applying data analysis, No. BPC-P-09, Nouri Petrochemical Company has set up communication channels with customers in order to determine its customers' communication needs. Moreover, it attempts to communicate with customers through holding meetings with them and made its employees to cooperate with them. In order to monitor and measure customer satisfaction with organization's activities and channels along with customers' communication, customer survey forms are gathered and their results are analyzed by Quality Assurance Unit. Subsequently, required improvements are done, for example, improvements have been made in developing communication channels in recent years and creating customers' questions & complaints on company's website.

With the aim of addressing customers' complaints, Nouri Petrochemical Company has defined "Grievance Procedure Approach" in keeping with strategic goals "improving effectiveness of export sales and increasing revenues" since 2012. Moreover, to measure the mentioned approach regularly, indicators such as "number of customers' complaints", "Customer Complaint Response Time" and "customers' loyalty" are monitored at 6 month intervals.

Quality Assurance Unit at Nouri Petrochemical Company has been sending customer survey forms to consumers who purchased more than 5000 tons of products and overseas, domestic & inter – complex customers at 6 month intervals. To illustrate, these forms consist of 10 questions on value proposition for customers and other issues. On the basis of this approach, those forms filled in by customers are gathered and analyzed using data analysis method, NO. BPC – P – 09. Consequently, nonconformities are discussed and necessary decisions are made in management review meetings. Additionally, performance indicators used in this process are "Conformity of product quality with declared specifications", "Conformity of the amount of delivered products with remittance", "Loading & Delivery of products", "Considering Environment & Safety requirements", "Employees behavior", "Transparency in Accountability & response to customers", "Effectiveness of communication channels", "Accessibility to attendants", "Customers' loyalty" and "Customer Complaint Response Time".

Also, "Customers' Survey Approach" is taken to use customers' experiences and feedbacks by Nouri Petrochemical Company.



#### • Ensuring Responsible Use of Products by Customers

On the basis of requirements of ISO 14001 Standards, OHSAS 18001 and Management System MS – HSE, considering potential risks of misusing company's products, MSDS of products, including a list of chemical characteristics of products and methods for controlling possible harms caused by misusing, would be given to customers. In this regard, information of MSDS product is also included on back of the product sales slip. Moreover, this information is also posted on the company's website. It is important to state that with the aim of customers' awareness of information related to products, the indicator "satisfaction with technical information and product characteristics" is also monitored.



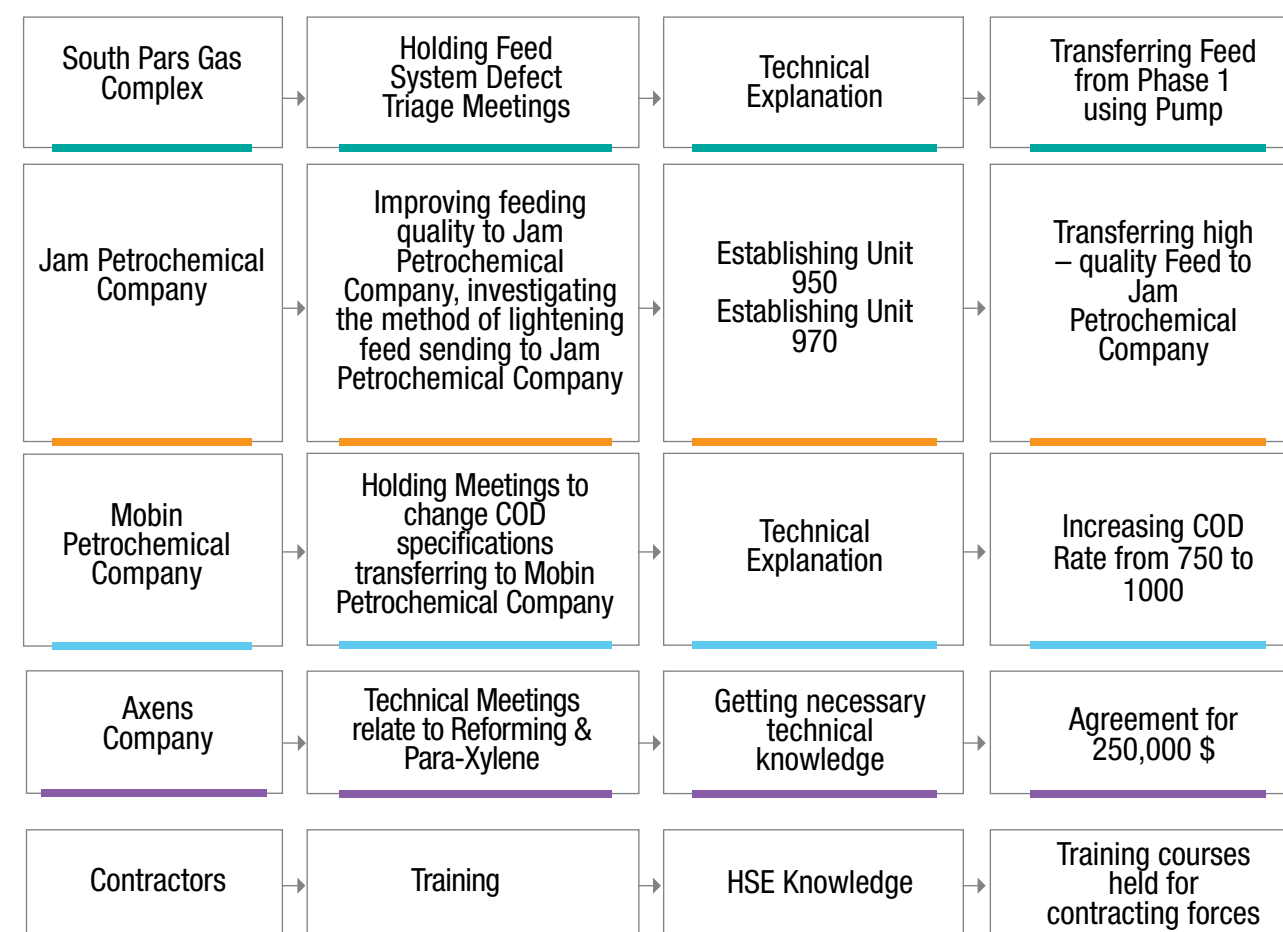
## Supply Chain Management

Nouri Petrochemical Company identifies the importance of social and environmental risk management in all its activities related to supply chain and seeks to take preventive approaches in its supply chain. In order to collaborate effectively, this company has defined “partners & suppliers’ management” approach on the basis of mutual trust & respect, determining partnership opportunities with suppliers and contractors, achieving mutual financial and knowledge benefits and ensuring that suppliers and partners’ performance along with organization strategic purposes. This approach is in line with strategic purposes including “promoting productivity”, “sustaining production” and “increasing revenue” as well as relating to “technology management”.

With the intention of preventing production resulted by spare parts sanction, supplying parts have been excluded from production as well as increasing capabilities in organization along with “promoting productivity” as a strategic purpose, Nouri Petrochemical Company focuses on partnership opportunities with manufacturers and “Self – Sufficiency Committee” is used. To illustrate, localization program of those imported spare parts which there was a problem in providing them was considered by setting up Self – Sufficiency Committee.

After three years of forming Self – Sufficiency Committee, regarding expanding sanctions, it was completely obvious to empower this committee because of Complex’s need to equipment and spare parts as well as ensuring the capability of domestic manufacturers and results of self – assessment. Consequently, in the first step, a specific agent was appointed to better organize activities related to the Committee in keeping with strategic purposes “promoting productivity” and “increasing revenue” to determine Self – Sufficiency Committee’s strategies. Then, more than 20000 items among all the items, spare parts and equipment were prepared and prioritized by 10 working groups based on holding several meetings. In line with this activity, database of suppliers & contractors was completed on the basis of studying, investigating and modelling from a variety of sources such as full information & experiences of SPEC company as well as Oil, Gas & Petrochemical Equipment Suppliers Association and EP contract information related to Vendor List and adding exclusive agents of reputable companies. In order to measure this approach on a regular and systematic basis, two indicators – “Economic feasibility” & “Number of manufactured parts” are defined, then, monitored and measured monthly. Consistent with strategic purposes and company’s values, Nouri Petrochemical Company acts in accordance with the following table to ensure suppliers and partners’ performance.

At Nouri Petrochemical Company, Supply Chain Management is considered as one of the fundamental processes for controlling costs and being able to meet stakeholders’ expectations and maintaining competitive advantage of the company. Therefore, this company has developed a management framework to strengthen relationship with its supply chain including suppliers and contractors, so that precisely assessing supply chain and identifying strengths & weaknesses and opportunities & threats resulted from supply chain as well as supply chain management standards could be improved. Moreover, in line with allocating resources and knowledge, Nouri Petrochemical Company has done several activities to achieve mutual benefits with its business partners as indicated in the following table:



### Ensuring Business Partners performance in line with Strategic Purposes

Measurement Method	Purpose	Compliance with Values	Compliance with Strategic Purposes	Suppliers & Partners
	Achieving Nominal Capacity of Continuity in Production	Safety & Environment Protection	Rate & Continuity of feed & utilities	Strategic Partners
Performance assessment of Suppliers	Continuity in Production	Safety & Environment Protection	On – time delivery of goods & on – time delivery of high – quality items	Key non – strategic partners



**Nouri**  
Petrochemical  
Company

# Management & Performance of Environmental Responsibility at Nouri Petrochemical Company

GRI 300 - Environmental





• Environmental Management

Nouri Petrochemical Company has always sought to control its pollutants in the air, water and soil by taking an environmental approach and considering environmental issues during designing, constructing and operating phases. Therefore, it was praised for taking conservation approaches and efforts to culturalize relating to environmental issues.

The impacts and consequences of production chain processes in terms of environmental risks and relevant aspects are investigated and monitored by Nouri Petrochemical Company through establishing occupational & environmental health and safety management systems. Furthermore, corrective & preventive actions and required programs and projects are done based on requirements of the above – mentioned systems with the purpose of controlling and minimizing the effects of occupational health, safety risks and environmental aspects. Along with, the effectiveness of the aforementioned approach is monitored and measured by the indicators of “compliance with environmental measurement results” and “occupational safety and health”. Subsequently, its results are considered in Strategic Council and Management Review Meetings and, if needed, opportunities for improving are defined and implemented. Environmental indicators are carefully monitored and reported under supervising Environmental Protection Agency at Nouri Petrochemical Company.

Process: Environment Man agement	Process Owner: HSE	Process Mission: Managing environmental consequences of Company
Process Type: Supporting	Influential References: Integrated Management System Holding Requirements, Organizational Strategies, Rules& Regulations	Required Resources: Human force, nternet, Office Automation, Office Equipment, related software

Receiver	Output	Activities	Responsible	Input	Sender
HSE	Handbooks of environmental aspects & list of obvious features	Managing environmental aspects, determining, evaluating (defining RPN) & prioritizing environmental aspects	HSE	Content of Complex activities	HSE
Revising Managem ent	Revising Management Report	Notifying implementation & supervision of law enforcement	HSE	Circulars & regulations of legal institutions	CEO
CEO HSE Legal Affaires Management Head of Organization & Deputy Complex Environment Protection Agency and others Subsidiary Entities Technical Services Improvement Management	Waste Management Report Reviewed statement Non – compliance report & Corrective items request Revising Management Report Wastewater Report Risk Assessment Report Corrective items & effectiveness monitoring report	Waste Management Reviewing statement & announcing Reviewing reports & stating non – compliance items with standard Adapting to environmental requirements & announcing non – compliance & Corrective and / or preventative items request Documenting & reporting on monitoring output industrial effluent Risk Assessment Report Corrective items & effectiveness monitoring report	HSE	Results of complaints or stakeholders' opinions Results of internal & external Audit or evaluating Results of environmental projects Waste disposal form Results of monitoring pollutants in self – reporting plan Contractor invoice Environmental Daily Report TSR Non – compliance report Request for contractor qualification review	Product production Legal Affairs Management Trusted Laboratory Laboratory (contract party) Product production Technical change management improvement & Corrective items management



### • The Environmental Activities

The following could be considered as the most important environmental activities done at Nouri Petrochemical Company;

1. Installing Vapor Recovery Unit (VRU) system for recovery of toxic & carcinogenic vapors caused by ship loading
2. Monitoring environmental pollutants by Trusted Laboratory of Environmental Protection Agency
3. Physical Pre – treatment of Industrial Wastewater in Complex & separating oils & suspended hydrocarbons
4. Reusing Waste Clay in concrete production
5. Creating & extending green spaces over 8.1 hectares or 13% of the complex area, which is beyond the legal requirements.
6. Implementing separation plan from recyclable waste sources such as paper, plastic etc. from common waste.
7. Improving Environmental Protection Culture by holding training classes & a painting contest, distributing Green Books and supporting the dolphins in Assaluyeh.

### • Important Activities done to Environment Protection Management

	Project	Start Date of Project	Finish Date of Project	Project Cost	Project Status	Explanations
1	Designing, purchasing, installing & commissioning flue output gas analyzer of furnace H - 4 - 3001	July, 2012	May, 2018	8 billion rials	%100	Analyzer is in service & SO <sub>2</sub> , NO <sub>x</sub> & CO and their current intensity are being monitored.
2	Leak detecting & monitoring Volatile – Hydrocarbon pollutants sources (LDAR)	March, 2017	August, 2018	3 billion rials	%70	Minor leaks of volatile pollutants from process connections & equipment, which could not be measured using common machines, are being detected, removed and monitored by this project. Leaks have been removed and are being re – monitored through Camera – IR.
3	Amine project for flaring reduction, fuel consumption reduction & SO <sub>2</sub> emissions reduction by recycling & processing gases sent to flare	2015	2019	25 million dollars	%50	Pollutant gas CO <sub>2</sub> is converted to Ammonium Sulfate by implementing this project along with flaring reduction, reducing natural gas consumption & reducing greenhouse gas emissions
4	Project of heat loss reduction & greenhouse gas emissions reduction by replacing & optimizing burners of all furnaces	2015	2019	200 billion rials	%20	Burners of furnaces of H1001-, H4-3001- & H8001- were replaced. While reducing gas consumption, their efficiency increased by %20. this project is being implemented for other furnaces.
5	Project of purchasing, installing & commissioning a new flare line flowmeter	June, 2013	February , 2018	6 billion rials	%70	New flowmeter of flare line was purchased & stored in Complex warehouse, as soon as the conditions are met, it would be replaced by the previous flow meter.
6	Establishing ISO 50001 Energy Management Standard & its special software (SAMAN)	2015	2017	6 billion rials	%100	ISO 50001 Standard was gained in 2016 & extended in 2017. The budget for installing & launching its special software (SAMAN) was 1 billion rials.



7	Projects of production bottlenecks, Energy Intensity reduction & greenhouse gas emissions (including replacing PAKINOX exchanger & internal reactors in Unit 300 & catalyst in Unit CCR)	2012	2017	6 billion euros	%100	In order to solve the process problems in reforming Unit, these three major projects were carried out in the major overhauls of the complex last autumn. In addition to achieving production goals, it has had a great impact on reducing Energy consumption which resulted in reducing greenhouse gas emissions.
8	Other projects on Energy management & greenhouse gas emissions reduction (including installing smart meters, modifying steam traps & Level 3 Energy Audit)	2012	2017	6 billion euros	%60	In order to solve the process problems in reforming Unit, these three major projects were carried out in the major overhauls of the complex last autumn. In addition to achieving production goals, it has had a great impact on reducing Energy consumption which resulted in reducing greenhouse gas emissions.
9	Dolphin Conservation Study Project in Nakhiloo & Mond Protected Areas	2013	To be continued ...	5 billion rials	%60	This project was started in 2013 supervised by General Department of Environment of Bushehr Province. and its fourth phase is in progress.
10	Study project on Heavy metal & Polycyclic aromatic hydrocarbons (PAHs) pollution in urban & industrial solid & dust in Assaluyeh and Kangan	2016	2018	1.3 billion rials	%60	This study project is being carried out supervised by General Department of Environment of Bushehr Province.
11	PSM implementation project in reducing risks of incidents, fire & environmental pollution	2016	2019	1 million euro	%30	This project is being in progress based on CCPS model contracting with reputable European Companies
12	Project of launching Vapor Recovery System while ship loading	2009	2012	250,000 dollars	%30	This system was given to Terminals & Tanks Petrochemical Company after launching & ensuring its proper function



Sustainability Report  
Nouri Petrochemical Co.

• Environmental Projects & Plans

In keeping with a 5 – year country development vision & its strategic purposes in the field of HSE, Nouri Petrochemical Company is applying the following plans & projects;

- 1. Process Safety Management Project (PSM). (This project provides an appropriate platform for preventing incidents, fires & environmental consequences resulted from those incidents & fires).
- 2. Implementing Revision HAZOP Project, Quantitative Risk Assessment (QRA), ... [this project is considered as one of the fundamentals of Process Safety Management which some parts of it have already been implemented through contract with E European companies.
- 3. Reducing greenhouse gas CO2 emission through implementing Burner Retrofitting Project for all furnaces.
- 4. Flaring Reduction Project with the aim of reducing greenhouse gas CO2 & Fuel Consumption.
- 5. Palladium Recovery Project from Catalysts

• Environmental Programs Budget in 1396 SH

A. Current Projects

Description of Costs		Budget (million rials)
1	Self – expression in Monitoring – Trusted Laboratory	100
2	Air and wastewater monitoring (non-routine)	50
3	Printing & Advertising Environmental Posters	100
4	Commemorating Special Days	200
5	Attending Exhibitions & Seinars	1000
6	Buying Books (especially for families & employees) on Environmental Issues	1000
7	Purchasing Sensors, Repairing & Calibrating Monitoring Equipment	400
8	Technical Services & Consultant PaymentMonitoring Equipment	500
9	Research Projects	7000
10	Industrial Waste Management Costs (clay, ...)	1000
11	Technical Software	200
Total		11550

B. Capital Projects

Description of Costs		Budget (million rials)
1	Eliminating or Reducing Emissions of Wastewater Ponds Projects	5000
2	Purchasing & Installing 15 On – line Monitoring Systems of CO parameters flue output gas of furnaces	20000
3	Installing On – Line Monitoring System of COD parameters in the outlet effluent route	3500
4	Constructing Waste Separation Area and Special & Hazardous Waste Storing	2000
5	Truck Loading Hydrocarbon Steam Removal Project	2000
6	Leak Detection and Quantification Fixed Sources of Volatile Pollutants Project (LDAR)	3000
7	Purchasing & Installing On – Line Monitoring System of Air quality	10000
8	Leak Detector IR - Camera	10000
9	Air Pollution Analyzer (Gasmet)	5000
Total		60500



## • Environmental Assessment

In order to measure and monitor optimizing operational consequences & product life cycle on environment, as well as achieving Oil, Gas & Petrochemical Standards in the field of HSE and based on the needs of employees, neighbors & local communities as main stakeholders, Nouri Petrochemical Company opted the approach to “Environmental Protection – Optimal Use of Resources & Energy”. To illustrate, in the period of constructing the Complex, this approach through implementing Health, Safety & Environment System Management (HSE MS) was established as the first company in Iran. Moreover, from the beginning of establishing the complex, it is being monitored through internal & external auditing and implementing Environment Management System ISO 14001/2004 and revising 2015 of this standard systematically in the organization. Environmental consequences caused by operations, repairs, services and other activities done by the Organization using executive method of identifying and assessing the highlighted aspects of energy have been determined, assessed and prioritized and recorded in the Environmental Aspects & Impacts Booklet. Moreover, it has been integrated into the Organization as an essential base of Standard ISO14001/2015 and an important part of IMS Management System in such a way that all the negative & positive aspects of the Organization's activities and products are controlled.

With the purpose of monitoring environmental pollutant emissions, indicators such as emission rate of SO<sub>2</sub>, NO<sub>x</sub>, ... from furnace are being monitored by Trusted Laboratory over a period of two months and then reported to Environmental Protection Agency officially. On the other hand, the process of indicators related to this approach has been revised and analyzed in in Management Revision Meetings. Also, corrective actions or improvement plan is taken into considerations in case the determined objectives have not been achieved or deviated from National & International Standards. In contrast, with the aim of complying with legal requirements, flare and rate of oxygen in furnace have been made available to the Supervising Organization through on line systems. Furthermore, on line analyzer of one of the furnaces was installed and the others are being in progress.

One of the most important steps in management cycle is supervising the performance to ensure being in the right direction, detecting errors and taking well – timed corrective actions. Along with, the process of supervising environmental performance is implemented at Nouri Petrochemical Company. Its most important steps are as follows;

1. Supervising environmental parameters of Air & Waste emissions

2. Daily investigating & analyzing Complex Laboratory results related to waste emissions and sending non – conformity issues to the relevant units
3. Updating environment indicators
4. Monthly Reporting on Complex environment & sending it to Management Planning Unit
5. Supervising & monitoring environmental aspects of operation units and sending the report to relevant units
6. Identifying & analyzing results by on line analyzers on flues in the Complex
7. Recognizing & analyzing Trusted Laboratory's results & sending non – conformity issues to relevant units
8. Obligating the contractor to present HSE plan before assigning the contract

In order to ensure that environment standards are being considered, pollutant parameters in waste & flue emissions are measured by Complex Laboratory and Trusted Laboratory of Environment Protection Agency periodically in the form of self – reporting plan. It should be noted that it could be achieved through implementing the process of measuring & monitoring environmental pollutants at Nouri Petrochemical Company. Moreover, regarding the latest environmental changes in trans – regional & global dimension. In keeping with the recent changes of the International Conventions, especially global warming & Paris Summit and reducing greenhouse gas emissions, this company has implemented necessary projects in its future agenda.

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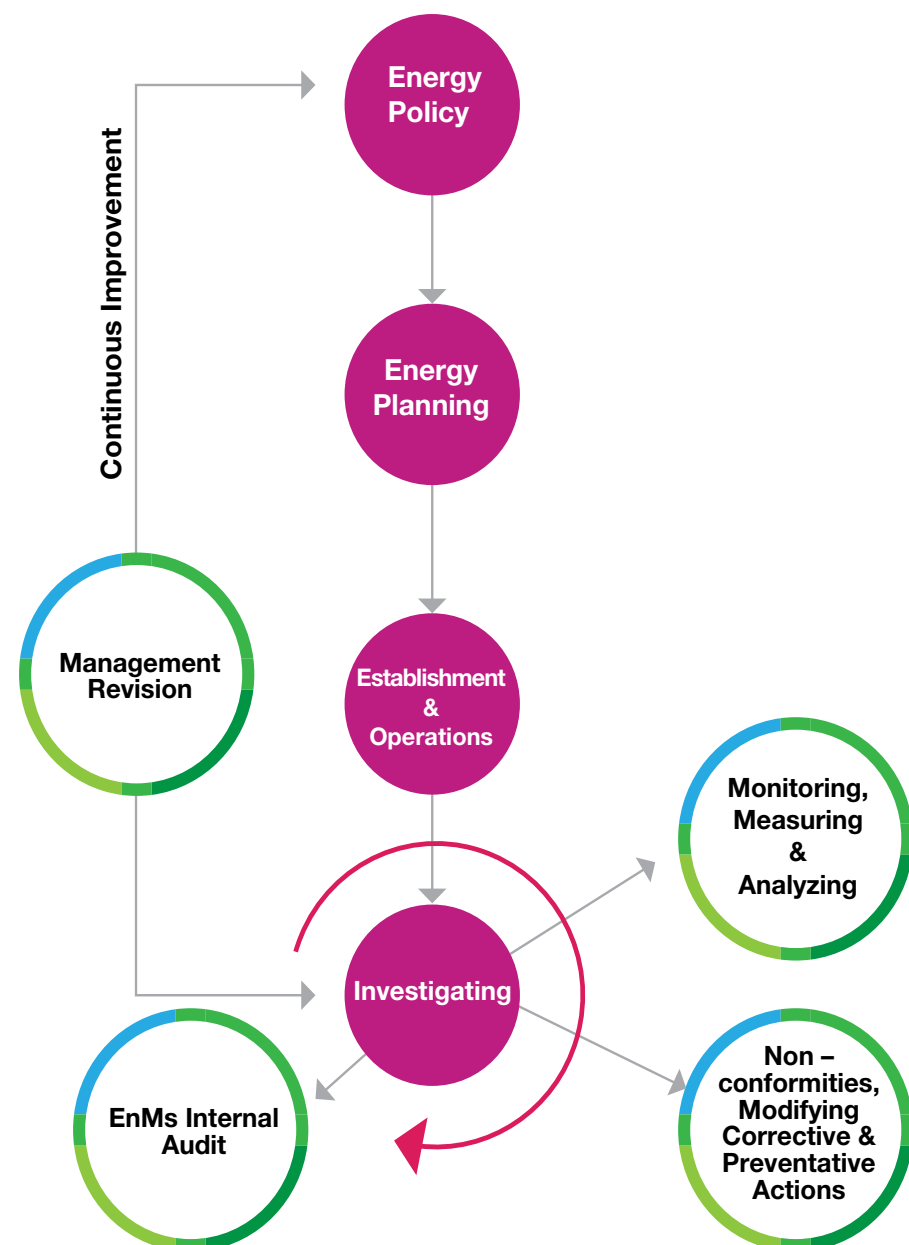
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## - Energy Management

Energy Management System Flowchart



### • Indicators related to Energy are as follows;

1. Internal Energy Consumption in Complex including the amount of energy consumed is restricted to the geographic area of the Company
2. External Energy Consumption in Complex related to the amount of energy consumed throughout the Organization Value Chain.
3. Energy Intensity (An index of measuring energy use efficiency)

In the field of Energy Efficiency & Energy Dissipation, Nouri Petrochemical Company acts on the basis of ISO 50001 Standard and Process Engineering & Energy Units operates alongside Production Control Unit. It should be mentioned that Production Control Unit is responsible for performing all monitoring and balancing between production & consumption. Moreover, Process Engineering Unit is in charge of supervising those issues related to monitoring all system, products characteristics and production while processing.

### • Energy Management Actions done by Nouri Petrochemical Company

Some of the activities done with the purpose of managing, controlling and optimizing Energy Consumption at Nouri Petrochemical Company are as follows;

- Obtaining a Conformity Energy Consumption Criterion Certificate in 2013, 2014, 2015 & 2016
- Establishing Energy Management System & obtaining ISO 50001 Certificate from SGS Switzerland.
- Processing Burners Modification Project & 18 % reduction of Energy Consumption in Furnace H – 1001
- Creating a central & automatic ventilation system for all buildings to maintain a balanced temperature & prevent energy loss
- Creating a Capacitor Bank on the main switchgear of Complex entrance gate (20 kilowatt) with the aim of increasing power factor & reducing reactive losses
- Mounting Earth Leakage Current Relay to protect motors & Leakage Current Protection Fuses in all lighting divisions to prevent Current Loss.
- Establishing Flare Gas Sweetening Unit to remove sulfur compounds from Gas Off produced by Units with the purpose of reducing flaring and using produced gas to supply furnace fuel which results in reducing fuel consumption. It should be mentioned that it is considered as one of the most significant projects to manage Energy and decrease greenhouse gases emission done by Nouri Petrochemical Company.



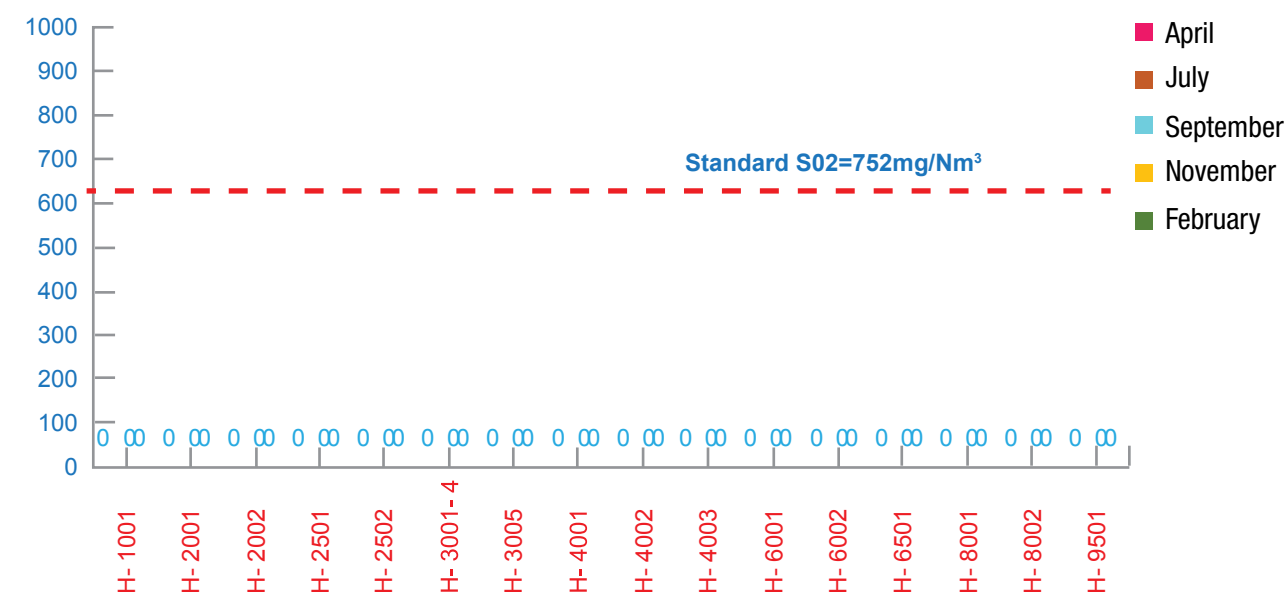


#### • Ongoing Programs to Manage Energy & Greenhouse Gases Emissions Reduction

- Intelligent Control of Electricity Consumers
- Replacing Burner of Furnace H - 3001, H - 3002, H - 3003 & H - 3004
- Changing Faulty Steam Traps

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#### Year 2017



#### • Activities done to Manage Energy

In order to remove minor pollutants emissions and improve the conditions of its furnaces to the current settings, the following activities done by Nouri Petrochemical Company;

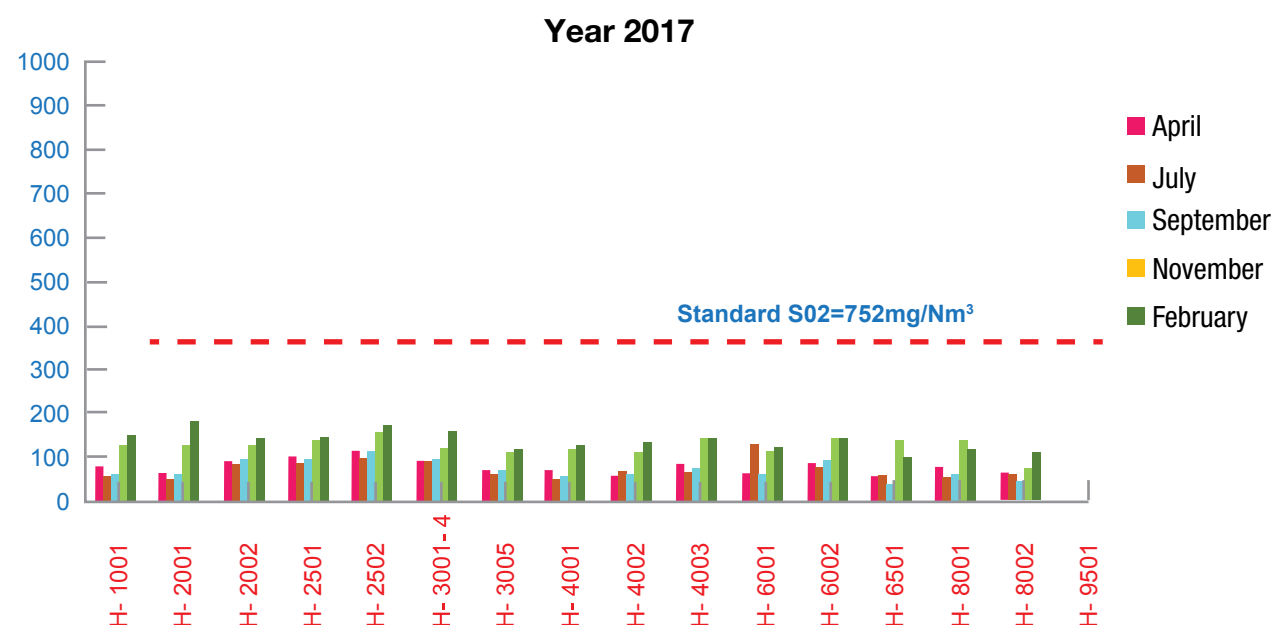
Fuel Consumption Reduction and Greenhouse gas of CO<sub>2</sub> Emission Reduction Projects were successfully done on furnace H - 1001 through replacing and modifying furnaces related to these projects in 2016. Consequently, Fuel Consumption was reduced by 18% and combustion status was improved significantly. The comprehensive report of this project was attached in appendix. It should be highlighted that success in implementing this project resulted in applying the above – mentioned project on the other furnaces and it is presently done on furnaces in Unit 800.

Continuous monitoring quality of furnace fuel by sampling and analyzing in in furnace fuel laboratory mainly contains hydrogen and light gases such as methane, ethane & propane and the amount of H<sub>2</sub>S is zero in fuel. Non-use of gases containing sulfur compounds as furnace fuel.

Using combined fuel (Natural gas + Excess gases Units) was regarded as to be one of the reasons related to excess pollutants emissions in furnaces in the past years which was an attempt to reduce flaring, fuel consumption & energy and greenhouse gas CO<sub>2</sub> emission. Although in most cases, and reduction of furnace emission rate was controlled and approximately permissible, sometimes a change in feed composition and an increase in sour gases in excess gases of Units which fed to fuel furnace network could make a temporarily change in furnace conditions. Moreover, by the time necessary controls are done by the operators working in operating units, some of parameters were exceeded the standard level, and in some cases of pollutant emission rate of one of furnaces was occasionally exceeded during 96 tests done on furnaces.

For this reason, in 2014, the benefits of recycling gases and saving fuel consumption were ignored and gas flue containing sulfur compounds to fuel furnace network was stopped and directed to flare. Then, it was decided not to use gases containing sulfur compounds as furnace fuels. This made the furnace fuel completely free of sulfur compounds. Since then, there has been no case of impermissible emission in furnaces of Nouri Petrochemical Company.





With the purpose of identifying, monitoring volatile pollutants emission sources from its process lines equipment & connections, the following steps have been taken by Nouri Petrochemical Company;

1. Implementing the project of identifying & reducing volatile organic compounds emission from equipment & connections relating to the operating lines through LDAR (Leak Detection & Repair) method in February, 2017.

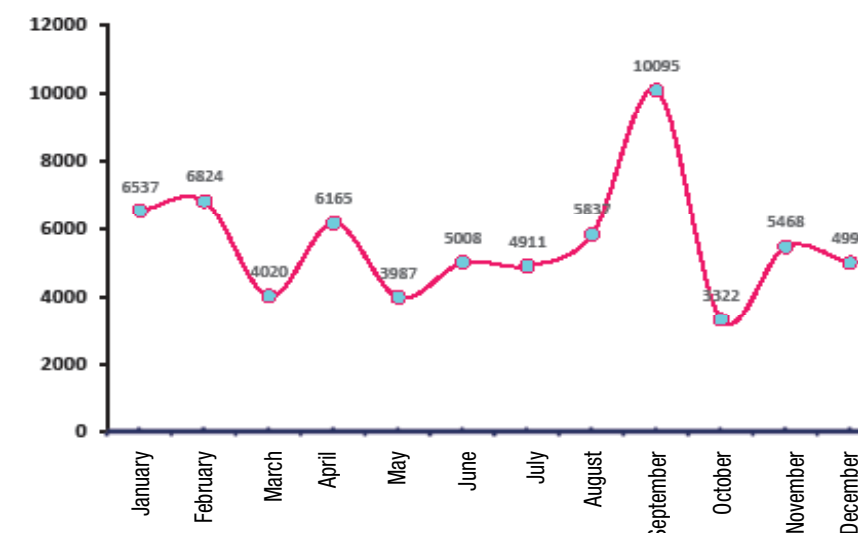
2. Implementing the study project on investigating Heavy Metals & Polycyclic Aromatic Hydrocarbons (PAHS) Pollution in urban & industrial soil and air metal contamination cooperating with Shiraz University in January, 2017.

Moreover, it should be noted that the burners used in this complex did not violate standards of Organization of standardization & Environmental Protection and other furnaces, excluding Furnace H – 1001, were of standard carbon monoxide emissions. However, in order to optimize energy consumption & reduce greenhouse gas emission, Nouri Petrochemical Company has purchased and replaced burners of furnace H – 8001 which reducing fuel consumption between 10 to 20 was

seen in this furnace. Also, the burners of furnaces H – 3001, H – 3002, H – 3003 & H – 3004 would be replaced with the new generation of burners costing 20 billion rials. On the other hand, there were no legal requirements for this. In this complex, hydrogen is released through Aromatization process, which is not currently used. To this end, Amine Unit Project is in progress. Separated hydrogen is reused for fuel. Therefore, it reduces energy consumption in addition to a positive action to be done for reducing greenhouse gas emission. Sulfur is separated in this unit and finally sold. In fact, this project is about to gain necessary certificates. In the past, produced hydrogen was burned in furnaces and because of mixing with sulfur, H<sub>2</sub>S gas was produced which led to energy loss & corrosion of furnaces in Nouri Petrochemical Company.

The first plan to solve this problem was to purify and remove sulfur, which would then be pumped into furnaces with the intention of hydrogen burning. Studies and pilots were done for about three years but isolation was done not more than 60 %.

## - Flaring chart for in 2017 based on tons



## • Activities done to Manage Energy

### Implementation of programs related to Environmental Protection Approach & Efficient Use of Resources & Energy

Environmental Consequences of Operations & Product Life Cycle	Control Program Title	Reason for implementing program	Project Status	Improvement Method	Stakeholders	Results
Emissions of combustion pollutants from furnaces	Monitoring environmental pollutants of furnaces by Trusted Laboratory of Environment Protection Agency	Based on Legal Requirements related to self – expression in monitoring	100 %	Executive Procedure for access to laws & regulations related to No. PBC-P14-	Local communities, Neighbors, Employees & Shareholders	On – time & Accurate implementing legal requirements, not receiving any notices or warnings from Environment Protection Agency
Emission of combustion pollutants from flare	On line monitoring of flare image	Based on Legal Requirements	100 %	Executive Procedure for access to laws & regulations related to No. PBC-P14-	Local communities, Neighbors, Employees & Shareholders	On – time & Accurate implementing legal requirements, not receiving any notices or warnings
Emission of combustion pollutants from flare	Designing, purchasing, installing & commissioning flue output gas analyzer of furnace H - 4 - 3001	Based on Legal Requirements	100 %	Executive Procedure for access to laws & regulations related to No. PBC-P14-	Local communities, Neighbors, Employees & Shareholders	Implementing legal requirements in due date
Emission of volatile pollutants from process equipment	Leak detecting & monitoring Volatile – Hydrocarbon pollutants sources (LDAR)	Beyond the Requirements	50 %	Benchmarking	Local communities, Neighbors, Employees & Shareholders	Ensuring contaminants (pollutants) are not released from equipment
Emission of combustion pollutants from flare	Purchasing, installing & commissioning of flare flowmeter	Based on Legal Requirements	10 %	Executive Procedure for access to laws & regulations related to No. PBC-P14-	Local communities, Neighbors, Employees & Shareholders	Implementing legal requirements in due date



**Implementation of programs related to Environmental Protection  
Approach & Efficient Use of Resources & Energy**

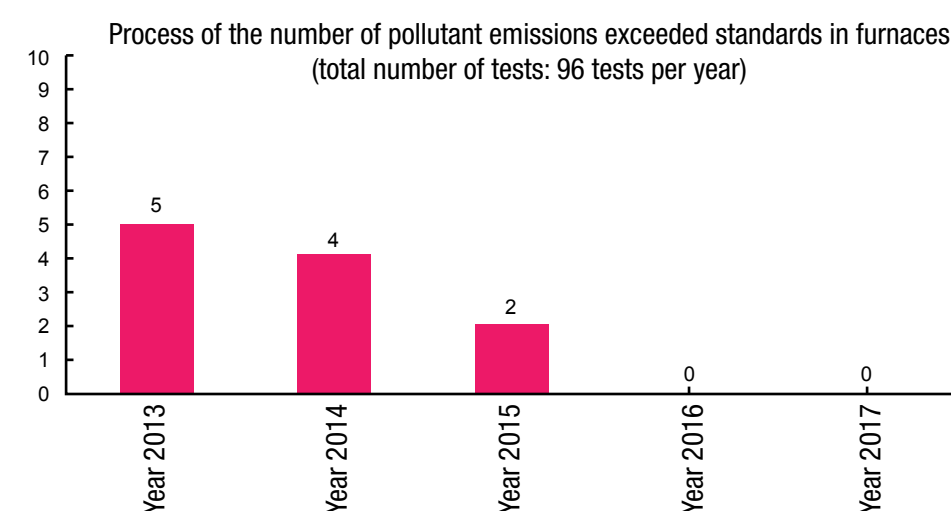
Emission of product loading equipment in export docks	Installing & commissioning Vapor Recovery Unit (VRU) during ship loading	Beyond the Requirements	100 %	Creativity & Training	Local communities, Neighbors, Employees & Shareholders	Preventing annual release of billions of cubic meters of pollutants into the environment & preventing waste of resources
Emission of combustion pollutants from flare	Project of Recycling gases sending to flare & reducing flaring	Beyond the Requirements	5 %	Creativity & Training	Local communities, Neighbors, Employees & Shareholders	Reducing greenhouse gases emission & preventing energy Waste
Emission of greenhouse gases	Study project of reducing heat losses & greenhouse gases through modifying burners of furnaces	Beyond the Requirements	It was done on furnace H – 1001 was done as a pilot	Creativity & Training	Local communities, Neighbors, Employees & Shareholders	Reducing greenhouse gases emission & preventing energy Waste
Emission of greenhouse gases	Implementing Energy Management System ISO 50001	Beyond the Requirements	Certificate was obtained	Creativity & Training	shareholders	Reducing greenhouse gases emission & preventing energy Waste
Sending industrial waste to Mobin central treatment plant	Purchasing, installing & commissioning on – line industrial waste PH & COD analyzer	Beyond the Requirements	PH analyzer purchased & installed. Choosing the model of COD analyzer is in progress	Creativity & Training	Local communities, Neighbors, Employees & Shareholders	Ensuring waste is being sent based on designing criteria
Catalytic waste production	Project of Platinum Recovery from catalysts & preventing waste of resources	Beyond the Requirements	100 %	Creativity & Training	Local communities, Neighbors, Employees & Shareholders	Environment protection & preventing waste of resources
Industrial soil waste production	Sending to Kangan cement factory and preventing soil contamination & waste of resources	Beyond the Requirements		Benchmarking	Local communities, Neighbors, Employees & Shareholders	Environment protection & preventing waste of resources
	Dolphin Conservation Study project in Mond & Nakhiloo	Beyond the Requirements	70 %	Creativity & Training	Shareholders	Marine animal species protection
Emission of combustion pollutants from flare	Designing, purchasing, installing & commissioning gas analyzer	Based on Legal Requirements	Under studying	Designing, purchasing, installing & commissioning flue output gas analyzer of furnace H - 4 - 3001	Local communities, Neighbors, Employees & Shareholders	Implementing legal requirements in due date
Project of Palladium Recovery from Catalysts	Project of Palladium Recovery from Catalysts		Under studying	Creativity & Training	Shareholders	

**• Gas Emissions**

At Nouri Petrochemical Company, there are 16 burners of furnaces in gas emissions or air pollution part should be considered and monitored on the basis of environmental standards. Also, in accordance with monitoring done and previous environmental standards, it ought to be noted that none of these burners did not exceed permissible environmental standards. Furthermore, with the change of environmental standards in line with Resolution approved by Cabinet of Ministers in 2016, although the heaters have been designed to be lower than permissible emissions limit at Nouri Petrochemical Company, Burners Modification Project has been determined with the purpose of reducing flue gases emissions from burners, optimizing energy consumption & environmental advantages. As mentioned earlier, this complex has 16 burners which their fuel is natural gas. Consequently, their designing conditions are as follows;

Pollutant Parameter	Standards of Environment Protection Agency (while constructing)	Complex designing standards	Furnace Manufacturer Standards	Average emission over the past ten years, based on Trusted Laboratory reports
CO	150	Maximum 100	100	20
XON	350	Maximum 300	146	50
CO2	800	Maximum 700	520	100

As shown in the above table, designing the furnaces in this company has been done in stricter conditions than National standards. In the following graph, according to reports provided by Trusted Laboratory of Environment Protection Agency, the process of non – standard emissions of pollutants from the furnaces of this company has been made. It illustrates minor removing non – compliance issues with standards in this company.





#### • Water Resources management

Water resources using in this complex include different types of industrial, consumptive, firefighting, SW, DM and DSW water which supplied by Mobin Petrochemical Company, so this complex does not use seawater directly. Seawater sweetening process is done by Mobin Petrochemical Company and then sent to units located in this region. All wastewater produced by the company is sent to central waste treatment plant and analyzed by Trusted Laboratory of Environment Protection Agency every week. Moreover, designing wastewater collection & transport system in Nouri petrochemical Company does not make it possible to discharge polluted water into the environment and all produced industrial & sanitary wastewater is sent to Mobin Petrochemical Company. Therefore, there is no way for this complex to connect with seawater and Cooling Water System is a closed rotary system which is completely isolated from the environment.

# Sustainability Report Nouri Petrochemical Co.





## • Effluents

Totally, three different types of effluents in three separated networks is produced in this complex;

### Industrial Effluents

This effluents includes hydrocarbon contaminated water from industrial equipment washing and drain lines and rainfall water is a process of collecting through all the industrial wastewater network called CWD and directed to the physical pretreatment of industrial wastewater. Then, after Separator API, oil and hydrocarbons are separated in two steps and is sent and recovered in feed tank.

Effluents from this part is completely free of suspended oil & hydrocarbons after testing and ensuring that pollutant parameters such as TDS, TSS, NH<sub>3</sub>, PH, COD ... are compliance with designing ranges of Mobin Petrochemical Company's treatment plant is sent with the aim of final treatment through pipelines

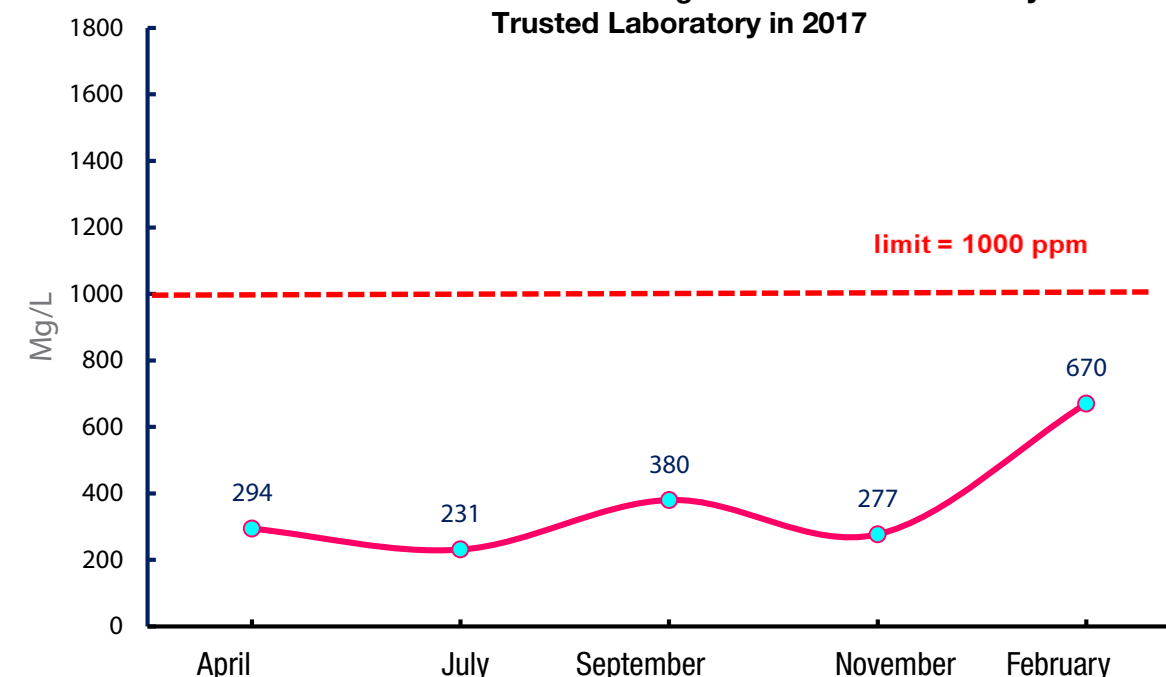
to that company. It is highly important to mention that Nouri Petrochemical Company is able to store its produced wastewater at its 2800 m<sup>3</sup> pond in case of emergency.

### Sanitary Effluents

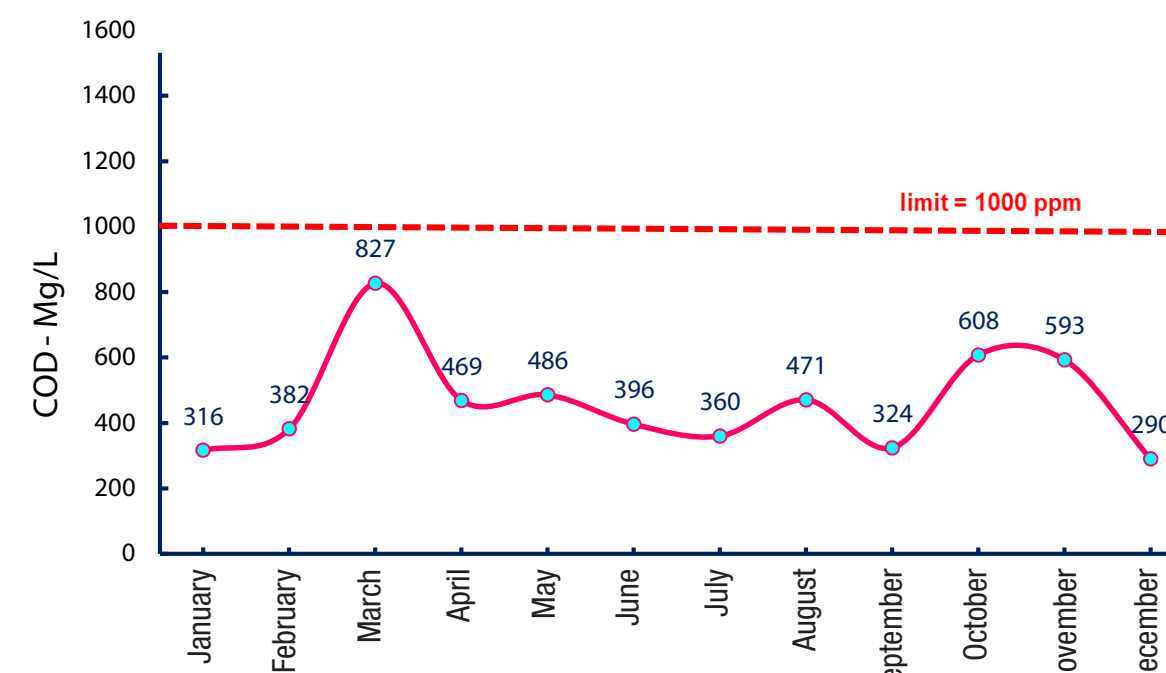
sanitary effluents would also be sent directly to Mobin Petrochemical Company after being collected by the Sanitary Complex for treatment.

Surface Runoff Waters from rainfalls in non – industrial areas get into the joint channel of Nouri & Mobin Petrochemical Companies due to being free from pollution. As this company has always compiled with the standards & conditions related to sending wastewater for the past eleven years as well as it has had a positive cooperation with Mobin Petrochemical Company, it has never had any problems with its wastewater transport & treatment. The status of COD parameter of industrial wastewater has been presented in the following charts in recent years.

**Results of COD Monitoring of Industrial Effluents by Trusted Laboratory in 2017**



**Average of COD industrial effluents sent to Mobin Petrochemical Company's treatment plant by Complex Laboratory in 2017**





## Waste Management

In order to prevent hydrocarbon materials waste and to reduce the negative effects of producing operations on the environment, “Hydrocarbon Materials Recovery Management” approach was taken by Nouri Petrochemical Company. It should be noted that this approach is in line with strategic goal “achieving HSE Standards” and based on the needs of community & shareholders. This company has made it possible to reuse and recycle OFF products in its initial designing. Subsequently, if the product does not conform to the technical specifications, the non – conforming product could be redirected back to the beginning of production line. Since, the feedstock used in this company is gas condensate and its products are mainly liquid, there is no significant process waste. Also, any probable non – conforming products which are called Spec Off, redirected back to feed tank and reprocess is done and finally recycled. It should be mentioned that none of petroleum and hydrocarbon materials would not be sent out due to environmental considerations & economic value. How to manage the main production waste in this company as follows;

### Reusing Clay Waste (industrial soil) in Cement Production:

Clay (industrial soil) is considered as the most important process waste which is completely free from any oil contamination after washing with steam & drying with nitrogen gas. Moreover, according to MSDS date, it could be buried with ordinary waste, but approximately 864 tons of this type of waste were delivered to Kangan Cement Factory with the purpose of reusing in cement production process in 2017.

### NFM Polymerized Solvent Waste:

NFM polymerized solvent waste is regarded as to be another type of waste in this company which is similar to bitumen (asphalt) and produced 2500 kg yearly and on the basis of standards burned in waste incinerator at Mobin Petrochemical Company.

### Recovery of Platinum from Catalyst AR405:

The basic elimination of all process filters & electrical waste (lamp & fluorescent lamp) through authorized companies under supervising & authorizing of Environmental Protection Agency (presently, a Knowledge enterprise named Pelikan which has been established in Najaf Abad for this purpose and Nouri Petrochemical Company is the first company to collaborate with it as a sponsor).

### Recycling 30,000 liters of expired foam by sending to the foam manufacturer company

Foam Scrap is considered as another problematic disposal which is currently returned to foam manufacturer company.

### Other items such as bottles, paper, etc. have their own contractor for receiving and recycling.

Recycling of 10,000 liters of Nalco chemical waste & Biocides through sending to manufacturer company

### Reusing Activated Alumina in paint industry supervised by Environmental Protection Agency

### Produced Industrial Oil Waste:

this type of waste is sold as a by – product. It should be noted that the method of disposal & recycling of this by – product is that it is added to one of the products during producing re – products and as its amount is not high, there would not be any problems. Consequently, this industrial oil is used in reusing process instead of disposal. (there is a product in grade gasoline named HYE which is 100% exported and it is heavy cutting part). So, it would find economic value and could not make any environmental problems. All the issues have been stated in waste management & wastes in Environmental Performance file of Nouri Petrochemical Company. At Nouri Petrochemical Company, waste management is codified, named and transported on the basis of waste management executive method, No. PBC-P-17 and priorities & requirements. Then, in terms of waste management necessary audits are done.

The status of waste management in this company in 2017 was shown in the following table.

Waste	Production Rate (ton)		Final Management Status
Industrial Soil (Clay)	864	54.5	Recycling in Cement Factory
Light & Florescent	0.09	0.005	Basic elimination in Pelikan Co.
HEMP Filters	11.1	0.7	Basic elimination in MAPSA Co.
NFM Solvent	12	0.12	Eliminating in waste incinerator at Mobin Petrochemical Company
Municipal Waste	575	36.3	
Total	1582	100	

## Considering Requirements

In Nouri Petrochemical Company, all the operational units are responsible for collecting produced wastes from production places and separated them and put in temporary placed (in special waste bins) determined by HSE. The following requirements are necessary to be considered with the aim of waste depot:

### Full Separation of Waste

### Considering MSDS Requirements of Waste

### Considering Compatibility of Waste during temporary collecting & storing

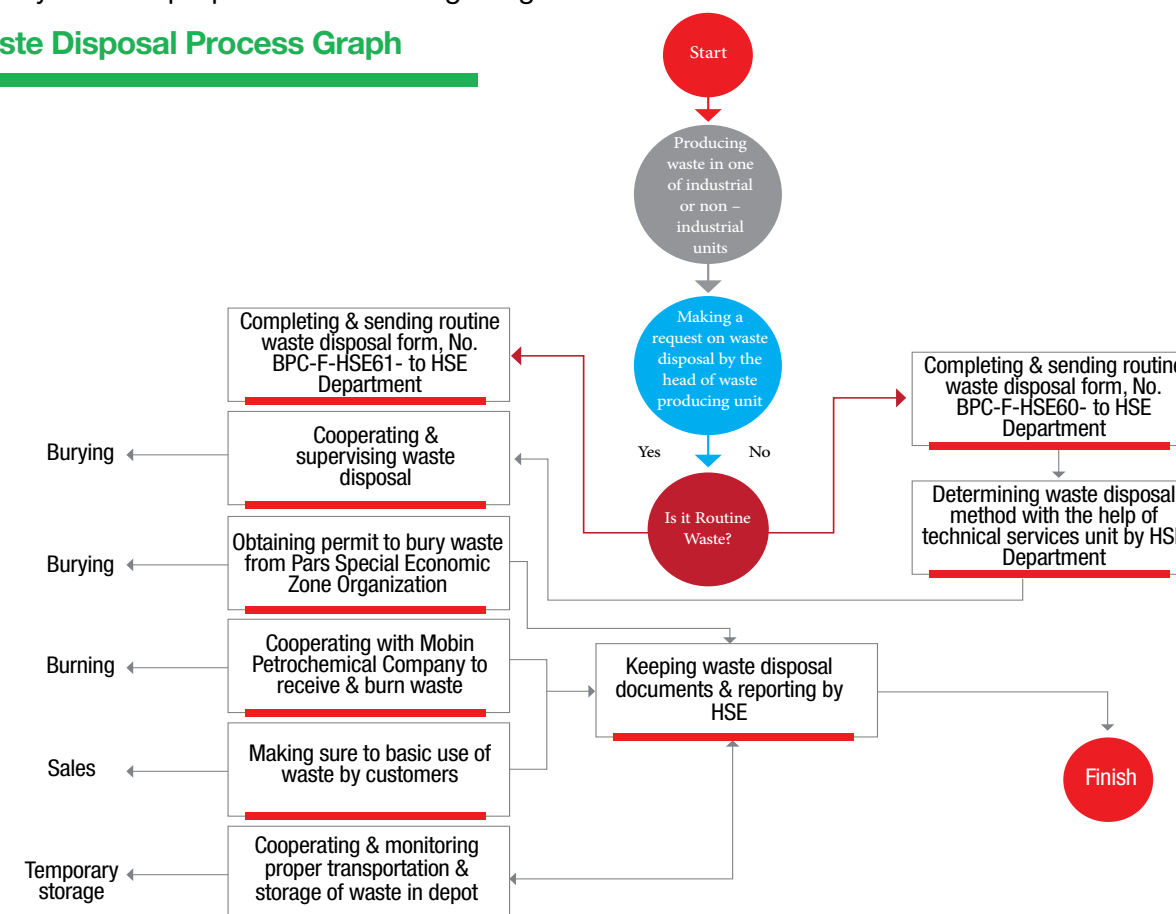
### Temporary Storing of Waste are done due to the following reasons in this company:

A) Disposal conditions are not prepared.

B) The amount of waste exceeds the acceptance of disposal places.

Moreover, compatibility of hazardous waste with each other is considered in temporary waste storing in this company with the purpose of not making dangerous conditions.

## Waste Disposal Process Graph





According to different environmental aspects, wastes are important. One of the most significant fields which managed on the basis of current approaches and processes by Nouri Petrochemical Company is wastes resulted from process & non – process operations in this complex. Along with, according to present methods and instructions, process & non – process wastes are identified, classified and codified. Important activities done for managing waste are as follows;

Basic supervising & following – up waste disposal, especially in landfills approved by Environmental Protection Agency or incinerated under controlled conditions using modern methods.

Implementing rules & regulations governing collection, storage, processing, transportation and safe disposal of hazardous & non – hazardous waste

Collecting monthly information & reports on waste made by units

Monthly waste reports in complex

Since Nouri Petrochemical Company produces intermediate products, feed recycling makes no sense but could be used in other usages. Generally, waste management is classified based on hazards and different environmental aspects. Industrial soil (clay) could be considered as the most recyclable materials which sent to cement factory and used. In addition, some of the catalysts used in this complex do not have the capability of reusing or disposal. So, Nouri Petrochemical Company attempts to separate their heavy metals cooperating with relevant companies which resulted in extracting Platinum. Waste production (generation) in

Nouri Petrochemical Company and its management in 2017 is shown separately in table 6.

Waste	Production Rate (ton)			Final Management (ton)		
	Total	Recycle	Sale	Incineration	Disposal	Temporary Storage
Restaurant & Municipal waste	575	0	0	0	575	0
Woods & Recyclable Waste	93.2	93.2	0	0	0	0
Hospital Waste	0.034	0	0	0.034	0	0
Industrial Oil	9.8	0	9.8	0	0	0
Different types of Bottles	0.16	0	0	0	0	0.16
Filters	11.1	0	0	11.1	0	0
Lamps	0.09	0	0	0	0	0.09
NFM Polymerized Solvent	2	0	0	0	2	0
Construction Waste	120	0	0	0	120	0
Industrial Soil (Clay)	864	864	0	0	0	0





• **Humpback Dolphin Conservation Project at Dayer – Nakhiloo National Park & Protected Area of Bushehr Province**

Humpback Dolphin has been added to the red list of International Union for Conservation of Nature (IUCN) as a threatened species. As a matter of fact, overfishing, crashing into boat blades, sea pollution and habitat destruction are regarded as to be major threats for humpback dolphins. Moreover, Dayer – Nakhiloo National Park is known as one of the most important habitats for humpback dolphins in Iran which has great fishery potential and one of the significant places for sea turtles lay.

Thousands of sternidae (terns) come to this place for laying every year. In spite of its high potential and abundant ecological value, primary information on this area is very restricted and studies have shown that marine resources decrease and sea pollution increases. Subsequently, in March 2013, Humpback Dolphins Conservation study project was started supervised by General Directorate of Environmental Protection Agency with the focus on further knowing this area, examining the population & distribution of humpback dolphins and preparing appropriate images of them.

Making a continuous relation between local people and natural resources in Dayer – Nakhiloo National

Park and protected area through training is considered as one of the objectives of this study project. The followings are the main objectives of the above – mentioned study project;

1. Identifying number of humpback dolphins based on Photo – Id
2. Finding new places of species dispersal at Dayer – Nakhiloo National Park & Mond protected area to provide dispersal map
3. Increasing public awareness, especially children, teenagers & fishermen in the bank of Dayer – Nakhiloo National Park and Mond protected area to conserve humpback dolphins
4. Investigating fishermen's activities and knowing the impact of conservation activities on improving fishermen & local people's incomes and engaging them in protecting, creating and empowering local teams to enter the conservation cycle.

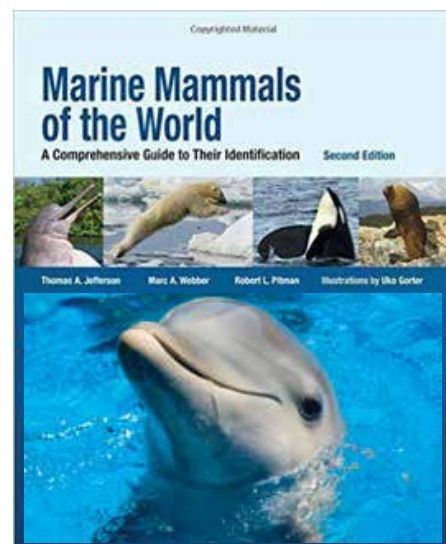
The method used in this project consists of doing library studies, field surveys, monthly maritime patrol and ID – photos which studying and analyzing images taken of humps in humpback dolphins through Distance method in monthly maritime patrol & random search, negotiating with Fishing Cooperatives and fishermen while fishing in this area.

An Image of Maritime Patrol Transects in Map Source Software





Images of some important world books which some images of this projects published in them.



122 G.R.T. Boudin et al.



**Figure 1** External morphology of adult Indian Ocean humpback dolphins (*Sousa plumbea*) from (A) Sri Lanka, Photograph: Anouk Bangkoon; (B) Iran, Photograph: Hamed Moshafian; (C) Pemba Island, Tanzania, Photograph: Gill Braulik; (D) Mossel Bay, South Africa, Photograph: Renat Logez.

There is considerable variation and population structure within the Indian Ocean humpback dolphin species and it is possible that additional work will reveal several subspecies (Figure 1; Jefferson and Rosenbaum, 2014). There is uncertainty about the taxonomic affinities of the humpback dolphin in eastern India, Sri Lanka, Bangladesh and Myanmar, but there are few samples available from this area to provide clarity (Jefferson and Rosenbaum, 2014). Preliminary genetic analysis indicates that humpback dolphins in Bangladesh are genetically distinct from all other members of the genus (*Amorim et al., 2015*). Future studies will confirm whether *S. plumbea* actually occurs east of the southern tip of India and will clarify the relationships and taxonomic affinities of humpback dolphins in the Bay of Bengal. However, as the taxonomy is currently not clearly resolved, we tentatively include *Sousa* that occur in the western Bay of Bengal within this *S. plumbea* review.



A collection of images from training courses held in different places of Dayer – Nakhiloo National Park and Mond Protected Area, Autumn 2017



A collection of images from training courses held for research team in Kish Island, July 2017





Number of Humpback Dolphins observed from December 2016 to November 2017

	Month	Number of days of sea monitoring	Total observed Dolphins	Running Time	Covered Distance (Km)
1	January	3	17	08,24	139
2	February	3	26	09,45	151
3	March	4	23	17,09	353,67
4	April	4	14	19,47	472
5	May	3	9	12,24	173
6	June	2	11	06,07	120,9
7	July	2	16	06,15	83,01
8	August	2	8	06,59	91,79
9	September	4	16	23,42	370,4
10	October	2	1	09,10	112,9
11	November	1	0	02,45	56,3
12	December	0	0	0	0
Total	12	30	144	120:27:00	2124

#### • Environmental Culturalizing & Training

Main strategies and approaches taken by Nouri Petrochemical Company support environmental Culturalizing and training. In keeping with the purpose of “developing, committing & promoting organizational knowledge management” and based on policy i.e. concerning creative & thoughtful human resources and improving scientific & technical level of employees through continuous training and developing human resources as the most important capital and focusing on their cooperation, different training – cultural activities and programs done in company as follows;

- Holding general & technical Environmental training courses
- Partaking in holding environmental conferences & events
- Providing & distributing environmental books, newsletters & occasional bulletins



#### • Complex Green Space

According to standard, 10 % of total space of Nouri Petrochemical Company should be green space. It should be noted that presently 13.2 % of this complex is allocated to green space, a project is being in progress by green space expert as well. In this way, those plant species that are capable of being planted are identifies and experimentally planted, in case of positive results of planting these species, they could be used out of complex on the basis of conditions of this region. Also, it is believed that this complex has helped South Pars Area to form and improve environment and green space. As a result, Nouri Petrochemical Company has provided more than 8 hectares, equivalent to 13% of the complex's green space, creating a vibrant environment that is unique in the region, and this process is being continued.





## Management & Performance of Social Responsibilities at Nouri Petrochemical Company

GRI 400 - Social



## • Employees

Nouri Petrochemical Company believes that human capitals are one of the most important fundamentals in supporting key processes to accomplish organization's policy and strategies, so Human Resources strategies, purposes and plans have been developed in the presence of the Heads of different departments and finally approved by the senior management of the organization. For this reason, in line with business strategies, Nouri Petrochemical Company attempts to apply Human Resources Task Strategy by forming committees consisting of members from different units in the company such as Human Resource Committee which includes representatives & trustees of Human Resources Processes.

## • Employees; the Most Important Capital at Nouri Petrochemical Company

Nouri Petrochemical Company respects all of its employees, without discrimination and regardless of job position or organizational unit and workplace. Moreover, it always promotes unity, integrity and trust among its employees as well as encourages them to treat each other with respect and courtesy. It should be noted that this company is committed to protecting its employees from internal & external occupational safety threats and providing a satisfying work environment for them. Additionally, the company seeks to provide employees with appropriate benefits and prosperity. It should be stated that the main objective of Human Resources Department at Nouri Petrochemical Company is to ensure that all employees do their job duties with car, diligence, perseverance, conscientiousness, rationality, concentration, interest and calm, and use the most of their professional knowledge which is accomplished through a variety of ways including satisfaction survey and targeting to optimize indicators related to employees' satisfaction.

### Number of Employees by line – staff Organization

	Total	Male	Female
Number of Employees	1179	1160	19
Number of Staff – organization Employees	104	89	15
Numbers of Line – organization Employees (production, distribution & service sections)	1075	1071	4

### Number of Employees by Type of Employment

	Total	Male	Female
Number of Corporate Staffing	518	504	14
Number of Contracting Staff	661	656	5

## • Nouri Petrochemical Company's Strategic Approach to Human Resources

Nouri Petrochemical Company is regarded as to be a production complex, which emphasizes Human Resources capability as one of the most fundamental corporate strategic assets as well as equipment and processes. For this reason, Nouri Petrochemical Company has attempted to compile its strategies in the field of human Resources as well as taking main strategies which resulted from strategy map in this company. In keeping with company's upstream documents, performance levels have been identified on the basis of company's mission and vision, achieving strategic, improving employees' knowledge & skills, enhancing efficiency and developing collaborating and group work. The following table shows these employees' performance levels:

### Employees' Performance Levels

Strategic Purposes	Defined Performance Levels	Tools
Developing employees' collaborating & teamwork, improving organizational culture & effectiveness of leadership, increasing process mechanism & integration, developing knowledge management & professional competence of employees, improving employees' satisfaction & motivations, promoting social responsibilities & environmental performance, developing safety of process & employees' health	Describing organizational positions and defined occupations in organizational chart, performance at levels of task units, identifying all organizational processes & their owner, targeting or monitoring them at defined interval	DACUM HAY GROUP Job Qualification Requirements BSC Job Description Organizational Chart Comprehensive Human Resources System Strategic Booklet QA Software

In line with strategic purpose "improving employees' knowledge & skills", since 2016, Nouri Petrochemical Company has implemented "Leadership Development Approach" to define leadership culture in organization and to improve individual behavior using Organization Evaluation Feedback Report in 2015.



## • Employees' Health & Safety

Ensuring a safe & healthy work environment is regarded as to be one of the most important issues which managers focus on at Nouri Petrochemical Company. In keeping with, one of the strategic purposes of this company is considering occupational health and safety legal requirements as well as being monitored continuously. With the intention of supporting continuous and committed programs and activities in this field, Nouri Petrochemical Company has implemented OHSAS18001 Standard and MS – HSE management system. It should be stated that implementing, improving and maintaining these two systems are monitored through internal & valid external auditing. Integrated developing of this approach could be seen in comprehensive management system policy of Nouri Petrochemical Company which some of its issues are as follows;

— Committing to continuous improvement in all fields of occupational healthy, quality and safety.

— Protecting environment and improving energy efficiency based on assessing comprehensive management performance

— Identifying & complying with legal requirements and other commitments related to activities, services and products in the fields of occupational health, safety, quality, environment & energy

— Along with strategic purposes and to eliminate and monitor risks and reduce industrial & occupational incidents, achieving Petrochemical, Gas & Oil standards in accordance with occupational & operational hazard identification guidelines as well as reporting unsafe conditions and results of periodic audits and inspections, achieving continuous production, sustainable profitability and promoting group collaboration, “

“eliminating and controlling hazards & reducing occupational and industrial accidents Approach” has been defined in Nouri Petrochemical Company.

Additionally, to implement this approach, using the results of HSE periodic audits and daily inspections, reports of unsafe practices and operating systems, including work permit system, periodic recording & relevance audits, work permit audits, equipment inspection systems, assessing risks of projects and technical service requests is carried out in accordance with internal guidelines and procedures. It should be stated that this approach is done by HSE department cooperating with all chiefs, supervisors and employees. Also, in order to support implementing this approach, those exemplary employees working in Safety, Health & Environment have been introduced annually and finally, they are

appreciated and honored on National Day of Safety & Firefighting. The following table shows programs related to Safety Approach.

## Sustainability Report Nouri Petrochemical Co.

### Programs done related to Safety Approach at Nouri Petrochemical Company

Operation Consequences	Control Program	Reason to execute program	Control Program	Stakeholders	Results
Possibility of Fire in Effluent/Sewage Basin	Designing, Purchasing & Installing Foam Fire Extinguishing System	Beyond the Requirements	Benchmarking	Local Communities, Neighbors, Employees & Shareholders	Ensuring the efficiency of system based on performance testing
Possibility of Fire in Server Room	Designing Fire Extinguishing System in server Room	Beyond the Requirements	Benchmarking	Local Communities, Neighbors, Employees & Shareholders	Designing based on Aerosol Fire Extinguishing System (No damage to equipment & Personnel)
Possibility of Fire in Chemical Warehouse	Designing Fire Extinguishing System for Chemical Racks Storage & Fire Alarm System for whole Storage	Beyond the Requirements	Benchmarking	Local Communities, Neighbors, Employees & Shareholders	Designing Foam Fire Extinguishing System for chemicals & Addressable Fire Alarm System
Possibility of Fire in Tanks	Fixing faults & complete commissioning Fire Alarm & Fire Extinguishing Systems in Tanks	AR4 Fire Extinguishing System Designing Requirements	Safety & Firefighting Execution Method	Local Communities, Neighbors, Employees & Shareholders	Ensuring the efficiency of system based on performance testing
Lack of effectively managing factors affecting safety of operations & processes	Implementing Process Management System (PMS)	Based on Legal Requirements of NPC Company	Benchmarking	Local Communities, Neighbors, Employees & Shareholders	-
Possibility of vehicles accidents with flare line	Reducing Risks of Accidents with flare line out of complex	-	Safety & Firefighting Execution Method	Local Communities, Neighbors, Employees & Shareholders	Securing flare line & installing physical barriers & protections ...
Sending Gasometer to Operating Control Room (but not received in Firefighting Control Room)	Controlling safety conditions & increasing reaction speed in emergency cases	Based on Safety Standards Requirements	Standards Requirements	Local Communities, Neighbors, Employees & Shareholders	Sending Alarm to Firefighting Control Room
Unable to identify, evaluate & control risks related to repair activities in Complex	Implementing new work permit system	Based on Legal Requirements of NPC Company	Benchmarking	Local Communities, Neighbors, Employees & Shareholders	General change in work permit format & related guidelines and implementing them in all operation units



Carrying out various projects in operational areas & need to review operational hazard studies (HAZOP)	Defining review project of HAZOP study	Based on Legal Requirements of NPC Company & NPI Standards	BPC-I16- Guideline	Local Communities, Neighbors, Employees & Shareholders	Report on reviewing HAZOP studies for Units 650 & 600 ,500
Lack of Gap Identification of HSE – MS & PSM systems	Auditing Gap Analysis by IRACA Company	Legal Requirements	-	Local Communities, Neighbors, Employees & Shareholders	Report on Gap Analysis & defining QRA & PSM projects
Necessity of having independent Fire Department at Nouri Petrochemical Company	Purchasing ladder platform fire truck	Making Fire Station at Nouri Petrochemical Company independent of Pazargad Company	Benchmarking	Local Communities, Neighbors, Employees & Shareholders	Preparing Fire truck proposal
Necessity of identifying operational risks	QRA studies project (Quantitative Risk Assessment)	Legal Requirements & API	Benchmarking	Local Communities, Neighbors, Employees & Shareholders	Preparing proposal
Possibility of fire in loading area	Optimizing water fire extinguishing system to automatic foam system	NFPA Standards Requirements	-	Local Communities, Neighbors, Employees & Shareholders	According to Circular No. 3 of NPC was put back on the agenda



• Employees' Health

In line with providing a safe & healthy workplace for employees and protecting their health, the following activities done by Nouri Petrochemical Company;

Periodic Personnel Examination (Permanent, fixed – term contract, temporary employees) annually as well as identifying & assessing occupational health risks in Complex

Industrial Health Audit & Inspections at all industrial & non – industrial sites at Nouri Petrochemical Company on a daily basis with the aim of monitoring good performance of health requirements (monthly & yearly) to audit all legal requirements.

Annual measuring harmful factors of workplace (chemical, physical, biological, ergonomic & psychological) in order to comply with legal requirements and to take corrective measures to prevent occupational diseases

Monitoring employees' health & nutrition issues, from raw materials entering restaurant to cooking & distributing (water purifiers) through measuring the amount of chlorine in drinking water & microbial sampling of water outlet in water purifiers

Doing specialized insect & rodent controls to prevent non – communicable (contagious) diseases & technical incidents

Table 3 indicates activities done by Nouri Petrochemical Company to provide a safe & healthy workplace for employees and protect their health.

The most important activities done to provide a safe & healthy workplace for employees

Periodic Medical Examinations	Accelerating periodic medical examinations to employees subject to labor law & approval of executive guarantees to oblige employees to refer t occupational medicine clinics to do necessary examinations based on schedule	Introducing all employees for annual medical examinations
Improving Health Care Coverage	Qualitative & Quantitative improving supplemental health insurance	Oil Industry Health Insurance, Social Security Health Insurance, Life & Accident Insurance, Supplemental Health Insurance
Providing Medical Services	Equipping clinic with CPR Unit, Establishing Medical Devices Sterilization Unit, Nutrition Clinic, Decontamination & Burns Salon	Establishing Complex Clinic under supervising Petroleum Industry Health Organization
Identifying Occupational Risks	Identifying occupational Risks by organization units with the help of consultative services & technical guidance by relevant experts	Compiling Occupational Risks Booklets
Developing Civil Liability Insurance	Third – party Insurance including visitors, interns & apprentices	Creating Civil Liability Insurance for all employees
Culturalizing	Holding Safety training courses for all employees	Holding safety training courses based on HSE Matrix, selecting HSE exemplary Unit on a quarterly basis & appreciating all employees working in HSE department, selecting HSE exemplary employees yearly & honoring them on Safety Day





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• Maintaining & Controlling Level of Employees’ Health

The purpose of safety indicators defined at Nouri Petrochemical Company is to help its employees to improve their safety. Also, it should be notated that it could be done through HSE department. However, it does not necessarily mean that there should be an official representative with employees’ perspective in a committee under this name. Notably, there have been no incidents and deaths caused by accidents in 2006 based on approaches and strategies taken and implemented (man hour without incident is zero).

Requirements of Department of Labor and NPC have been considered as well as legal requirements in Oil, Gas & Petrochemical Industry in the field of Safety & Health. To explain, requirements related to personnel exposure to harmful factors, chemical, ergonomic and physical factors in workplace could be regarded as to be those legal requirements which considered by Nouri Petrochemical Company.

At Nouri Petrochemical Company, a list of all available chemicals which might be hazardous is provided and safety issues related to them are defined and constantly monitored. Other activities which done with the intention of providing a safe & healthy workplace for employees and their health care could be named equipping the company with an independent fire engine, establishing an emergency shelter, conducting survey from employees on their workplace, health, safety and defense management resulting from gas emissions.

In order to reduce identified risks, unsafe acts & conditions, number of pseudo – accidents, occupational & process accidents and fires, several executive activities and plans have been designed and implemented. Among those plans, it could be stated forming committee on improving HSE culture, holding HSE training courses for all employees, establishing process management system, reviewing and providing safety guidelines based on the latest edit of world standards.

To preserve human resources as the most important stakeholders of this company and considering Oil, Gas & Petrochemical standards, Nouri Petrochemical Company considered “Maintaining & Controlling the level of Employees’ Health” Approach. In addition to extracting Risk Matrix from risk assessment, measurable points have been defined with the purpose of validating obtained risks. Then, information, which resulted from monitoring and measuring, have been complied with risk assessment and those issues were out of standard have been put in control plan.

Health Level control Plans at Nouri Petrochemical Company

1. Controlling resource or Removing risk factor
2. In case of impossibility of removing at level 1, level 2 would be occurred resulting in a change in process or replacing risk factor
3. In case of impossibility of implementing level 2, level 3 could be considered which consists of isolation.
4. If isolation is not possible, level four which includes management control actions would be implemented.
5. In case of impossibility of implementing level 4, using individual equipment is regarded which is one of control programs.

Each of the above – mentioned levels could be implemented in combination or individually at Nouri Petrochemical Company. With the intention of measuring the stated approach systematically and regularly,

According to those activities done at Nouri Petrochemical Company, technical projects and plans have been defined and in progress with the aim of identifying and monitoring risks more effectively as follows;

- Risk Assessment of Chemicals Project
- Risk Assessment of Physical Factors & hazards (vibration, sound, heat, cold, pressure, humidity, lighting)
- Risk Assessment of Ergonomic Factors
- Determining the lifetime & type of respiratory mask & Fit Test operations
- Improving conditions of control room in Operation Unit in terms of designing and interior decoration
- Qualitative evaluating Personal Protective Equipment

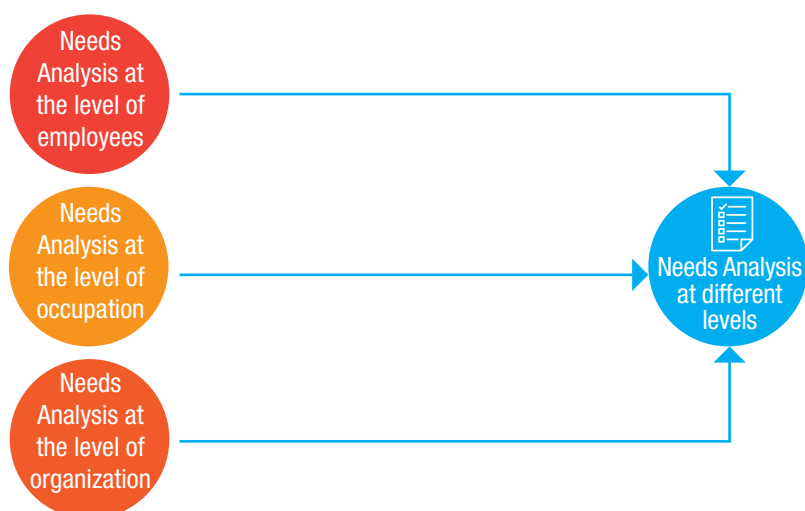
Employees’ safety is considered as the most important safety issue which several requirements have been define for changing related guidelines by National Petrochemical Industries Company. Moreover, since three years ago, Nouri Petrochemical Company has formed a committee including operation, HSE, maintenance & repairs departments. It should be stated that this committee attempted to provide new guideline using investigation results and their visits while visiting companies that have permit & risk identification system. So, responsibilities of permit issuer, doer of the work, Safe Maker in the place have been more obvious. It is also needed to note that old systems merely had determined responsibilities of permit issuers and doer of the work.

For the purpose of regular and systematic measurements of such an approach, the following indicators are defined: medical examination coverage percentage, suitable percentage for the job, conditional percentage for the job, unsuitable percentage for the job, nutritional diseases, psychometric and occupational diseases. These indicators are periodically exerted through risk management, monitoring the harmful agents at the workplace, and the application of periodic examination documents and occupational therapy.

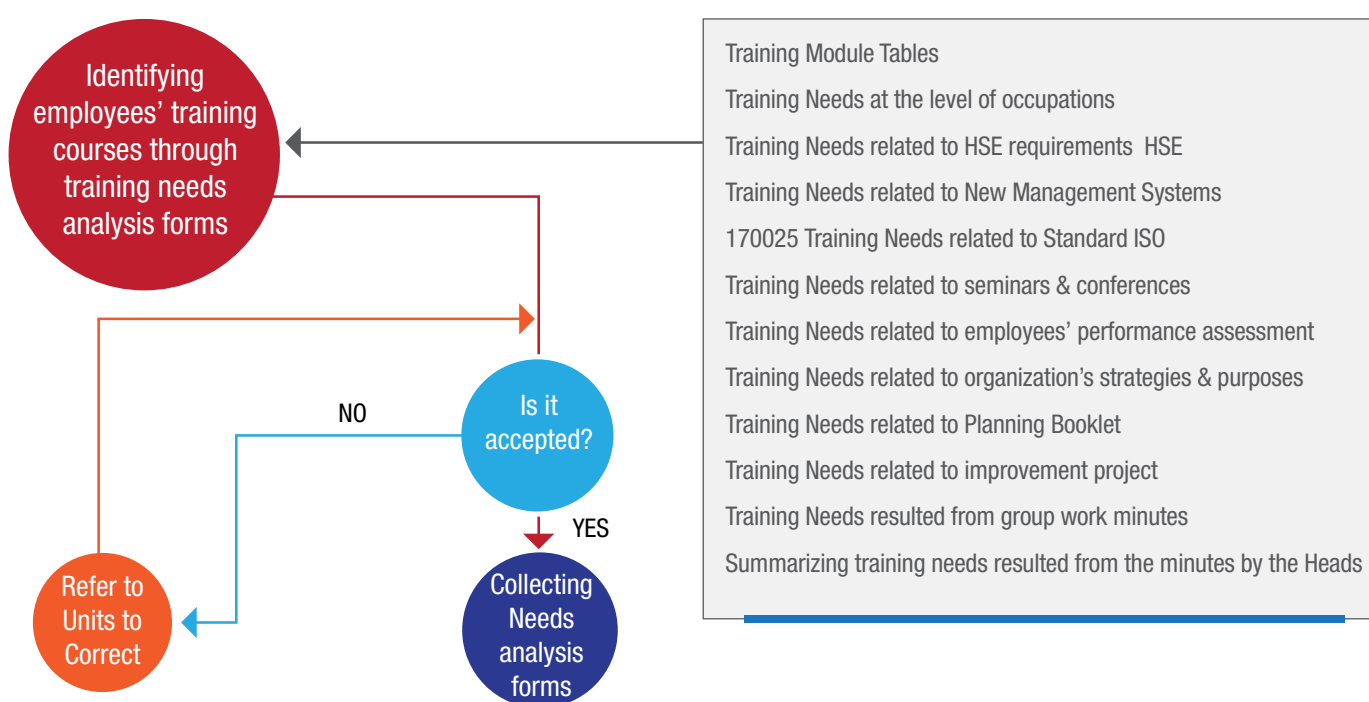


## • Employees Development & Training

In order to develop abilities & competencies, Nouri Petrochemical Company applies the mentioned methods which shown in the following diagram using “Training Approach”. This company defines a “training” approach to develop and update abilities & competencies required for its employees and, consequently, to achieve the expected performance levels in order to fulfill organization’s mission, vision & strategic goals of the organization. To illustrate, this approach as well as subsidiary approaches including “Needs Analysis”, “Planning” and “Implementing” are as follows;



## • Workflow in Training Needs Analysis Process



Focusing on employees as one of the key stakeholders in the company, all activities related to training approach attempt to increase three features including employees’ abilities, knowledge & attitude which are expected by the company.

### Training Course held by Nouri Petrochemical Company in 2017

Training Course	Number of Training Course	Man – hour
Technical & Engineering	64	4972
Management & Non-technical	51	5519
English	30	3438
Health, Safety & Environment (HSE)	127	7703
Information & Awareness Seminars	32	1095
<b>Total</b>	<b>304</b>	<b>22727</b>

Performance results of this approach could be measured and improved through relevant indicators. Moreover, the obtained results related to the training courses are measured through surveys done at the end of training courses. In fact, this approach has been taken in line with “implementing long – term & short – term training courses” strategy and achieving “improving employees’ knowledge & abilities” as a strategic purpose. Also, it should be noted that training approach is directly related to succession planning, career path and performance evaluation approaches. Additionally, in keeping with improving efficiency of training programs and empowering employees, Nouri petrochemical Company has attempted to monitor the average training hours per employee a year, developing training programs based on job position, implementing job promotion plans, transferring employees’ abilities and skills, knowledge transferring programs to improve employment level and managing it in case of disabled or dismissed states.

### Improving Employees’ Abilities & Skills

Methods to improve Abilities & Skills	Examples
In – Country Related Training	Training Experiences
Sending Overseas Training Courses	Sending a three – person team to training courses Crisis Management in Netherland Occupational Health Course in Spain
Supporting scientific articles provided by employees	Rewards for submitting Physical Asset Management Article
Supporting scientific articles provided by employees Rewards for submitting Physical asset Management Article	Sending 8 persons to International Conference
Supporting scientific articles provided by employees	Rewards for submitting Physical Asset Management Article
Using skilled employees as training courses instructors	Teaching HSE, Compressor & Instrumentation Courses and so on
Supporting to compile, translate & publish books provided by employees	Publishing a book on Hot & Cold Work Permit Publishing Nouri Petrochemical Company's Safety Book
Membership in Company's workgroups & Committees	Membership of 120 persons in different workgroups based on workgroups ID
Succession Planning Approach	Training Programs related to Succession Planning Approach



## • Employee Satisfaction Assessment

In order to find out the present status of the organization in the field of employees and using their opinions with the intention of improving strategy, policy and employees' plans, employee satisfaction assessment approach was implemented by managers at Nouri Petrochemical Company. To illustrate, since 2009, this approach has been taken after providing a questionnaire and evaluating its validity & reliability by the related advisor cooperating with organization's managers and experts and holding meetings and finding out members' views.

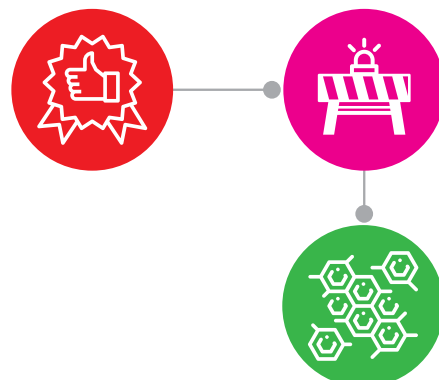
In accordance with the above – mentioned approach, employees' views have been monitored yearly and it could be attempted to control the level of employee job satisfaction through organizing improvement plans as well as reviewing employees' plans based on their opinions. As an example, employees' educational degrees adjusting procedure, which was one of the most important their dissatisfaction, was modified by forming human resources committee in 2014. Consequently, it was revised and technical interview with applicant was added to educational degree adjusting process in 2015. It should be noted that adjusting compensation and benefits to temporary & contracting employees is considered as another significant issues has been focused on by Nouri Petrochemical company. After investigating the obtained results from survey related to contracting, temporary and fixed – term contract employees done in 2014, in line with organization's major purposes and increasing employees' satisfaction, the management at Nouri Petrochemical Company had several meetings with Human Resources managers of Persian Gulf Holding subsidiary companies. Subsequently, the following activities have been done by the company after discussing the issue of reforming employee payroll system related to contracting companies, managing temporary employee payroll system and reviewing legal approaches in current laws & regulations framework provided by trusted advisors;

Developing & reforming wage payment system for employees working for contracting companies including ranking & running wage table.

Extraordinary shift payment to shift contracting employees, at a rate of 35% of daily wage Pay

Paying 30% of daily wage as other benefits to contracting employees

Revising & reforming payroll system related to those employees whose employment status



converted from contracting to temporary (including ranking & applying wage table)

Amending the regulations on motivational welfare benefits

## • Benefits & Welfare Services

The benefits given to employees are as follows;

Providing housing conditions for contracting employees similar to housing conditions created for permanent employees

Providing restaurant services

Travel Affairs (Transporting from the cities employees reside to company & vice versa)

Transporting in this region (transportation services for all personnel & contractors)

Cleaning Unit (related to cleaning all passageways & green spaces)

Sports (including gyms, holding domestic sports competitions, responsible for sending sports teams to regional & oil competitions)

Residence Unit (responsible for providing accommodation for guests & corporate housing units (210 units)

Accommodation & travel facilities for employees and their families in cities such as Shiraz, Kish, Mashhad, North of Iran, ... and signing a contract of welfare facilities & services in four cities for employees use.

Signing a contract with gyms with the aim of enhancing employees' physical & mental health

As mentioned earlier in occupational health section of this report, other activities and projects have been defined and implemented in organization that they could be classified based on the approach of improving efficiency of human forces and considering employees' welfare and benefits. Some of these activities and projects are as follows;

Risk assessment of chemical factors to separate occupational hazards from perspective of facing with chemical pollutants and reduce operational risks

Risk assessment of physical factors to reduce operational risks facing physical factors such as sound vibration and atmospheric conditions.

Risk assessment of ergonomic factors & evaluation of work postures and reducing musculoskeletal diseases





### • Improving Employees' Occupational Participation at Nouri Petrochemical company

It is highly important to state that Nouri Petrochemical Company is a dynamic organization that could use all its capabilities to develop in keeping with organization excellence and its employees. Subsequently, on the basis of various ways, this company cooperates with its employees or their representatives in organization's activities and projects such as developing and reviewing strategies and programs related to human resources as indicated in the following table. Also, with the intention of creating appropriate conditions for employees' participation or their representatives, this company took a variety of approaches. Consequently, results of their reviews are discussed and decided in Strategic Council and Human Resources Committee and lead to improving organizational processes.

#### How Employees Participate in Developing Human Resources Plans

Programs & Strategies	Programs & Strategies	How Employees & their Representatives participate	Approach
	Developing & Reviewing Strategies	Developing & Reviewing Strategies	Strategic planning
Programs & Strategies	Training	Representatives of units in training needs analysis	Needs Analysis Approach
	Healthcare	Using employees' opinions through job satisfaction survey	Job Satisfaction Survey
	Partnership System	Using all employees' opinions including permanent, temporary & contracting employees in improving organization's processes, measuring employees satisfaction with providing conditions for teamwork & their participation in corporate decision making through employee survey	Suggestion System, Committees & Workgroups
	Knowledge Management	Using all employees' technical knowledge to improve processes	Knowledge Registration Methods
	Communication Channels	Using all employees' knowledge to develop	Communication Channels Survey
	Welfare Services	Using employees' opinions & suggestions	Job Satisfaction Survey
	Improving employees' Satisfaction	Participation of representatives of all organizational units in Satisfaction Promotion Committee	Job Satisfaction Survey

At Nouri Petrochemical Company, employees who are actively involved in committees, workgroups and extracurricular activities are given material & spiritual encouragement. It should be mentioned that although encouraging has been done continuously in the company since past years, in order to manage more effectively and systematically as well as align encouragements with achieving goals and vision, all department heads, committees and workgroups have announced CEO about their requests of compensation and reasons through the format developed in the office automation system since 2014.

In keeping with achieving company strategic program better, "Compensation Committee" approach was taken to improve teamwork and collaborating by Nouri Petrochemical company. It is expected that the above – mentioned committee appreciates employees' efforts and support them in different areas appropriately.

At Nouri Petrochemical Company, "Compensation Committee" includes CEO (chairman of Committee),

Complex Manager, Human Resources Director, Director of Human Resources Planning (Committee Secretary) and if necessary, the Head of Unit asking for the encouragement. The meetings of this committee are held in a period of two months and decisions are made based on the received requests. The work procedure in Compensation Committee is that received requests are stated and appropriate decisions (material encouragement) are made on the basis of type and nature of requests and done activities. Subsequently, approved financial rewards (remunerations) are paid to employees through payroll system. This approach is monitored and measured using indicators such as "amount of paid remuneration" and "number of remunerated employees". It should be noted that this approach has been taken in keeping with increasing motivation in workforce as one of the key stakeholders and strategic purpose "improving teamwork & collaborating". Since implementing this approach aims to motivate employees to use creativity and innovation in order to achieve strategic goals, this approach has a direct impact on approaches such as knowledge management and participation.

### • Work – Life Balance

One of the link areas between sustainability of Corporate performance and sustainability of communities relating to its activities is considering balanced quality of work life and family life of employees. In keeping with, Nouri Petrochemical Company has attempted to strengthen this link and provide key stakeholders with relevant economic and social benefits through different activities and programs. The following measures have been done to order to maintain work – life balance with the aim of strategic purpose "promoting productivity" as indicated in the table.

#### Measures taken in line with Strategic Purpose "Productivity"

Type of Measure	Relevant Indicator	Type of Measure	Relevant Indicator
Creating an 8 Hour Work shift	Level of employees satisfaction with work shift	Providing flight services to employees who periodically travel between their place of residence & work	Employee Satisfaction
Staff Accommodation in Town	-Satisfaction level from housing provided by company -Percentage of employee resident in the region to those who have applied for it	Creating tourism & Pilgrimage facilities	Satisfaction with welfare & entertainment facilities
Implementing Production Incentive Pay Plan instead of overtime working	- Human Resources Productivity - Reducing useless hours of attending the Complex	Implementing two – week work & one – week Off plan for resident employees over Summer	- Reducing job stress - Increasing public satisfaction
Allocating flight quotas to resident employees	- Level of satisfaction with flight facilities - Facilities used compared to total available facilities	Holding celebrations on various occasions	Satisfying with celebrations held on different occasions
Accommodating staff periodically travelling between their place of residence & work in Camps & Hotels	Satisfying with Camp & Hotel	Changing working conditions for contracting & temporary employees	Employees public satisfaction

Moreover, with the intention of improving work – life balance, managing leisure time of employees' families, developing family relationships and increasing intimacy in families, Nouri Petrochemical Company mainly focuses on developing specialized – artistic skills of employees' family members (wives and children) and sports programs. It should be noted that specialized workshops on home & art skills for women, including handicrafts, music, sewing arts and other types of art courses are considered as the most important areas which cultural and training programs could be done through them. Consequently, participants are given a certificate after completing the training courses. In addition, in order to improve school children's knowledge in school subjects, supplementary training courses are planned and implemented for employees' families. In fact, increasing children's skills in computer, creativity, Internet is considered by Nouri Petrochemical Company annually. Also, this company has enthusiastically participated in sports competitions held in this area, and could achieve the first place in some sports.



## Diversity & Equal Opportunities

With the intention of providing its required human resources, regarding justice & equal opportunities, Nouri Petrochemical Company applies "Recruitment Approach" on the basis of organizational chart. It should be noted that this approach has been taken and implemented according to the instruction related to regulations & criteria on human resources selecting and recruiting in oil industry. Applying the above – mentioned approach resulted in providing required human resources and regarded as to be one of the main production and capital entities. Also, this approach has been taken in line with strategic purpose of "promoting productivity". To illustrate, in accordance with this approach, human resources needed for organizational positions and occupations with determined rank and qualifications, are selected and recruited through Employment Test, Employment Services Management in Special Economic Zone and transferring from other partner companies. Then, the accepted people and those who applied for transferring to other companies are introduced to the Recruitment Committee. In this committee, people who are introduced, are recruited after interviews on technical, administrative issues and English & computer knowledge done by the Committee members including organization's managers and experts. Moreover, "career path" approach has been defined and implemented at Nouri Petrochemical Company to increase competitiveness among employees, to use employees effectively and to improve their dignity. It should be stated that this approach is based on the instructions related to employees' promotions and appointments in oil industry.

Nouri Petrochemical Company has defined "Succession Planning Approach" with the aim of identifying and developing qualified human resources and ensuring continuous and sustainable availability of experienced and capable human resources in all areas related to organization's activities through Persian Gulf Petrochemical Industries Company. "Succession Planning Approach" is implemented for improving human resources and promoting employees at critical and higher positions in organizational chart. Additionally, this approach has been determined and applied in keeping with achieving strategic purposes "Sustaining production" and "Promoting productivity" and is related to "career path" approaches associated with employee's promotions, appointments and training.

This "career path" for each employee is determined on the basis of such inputs such as performance appraisal records, promotion records, employees'

work experiences and taken training courses by Personnel Committee. It should be stated that this approach for employees as key stakeholders of the company, could result in increasing motivation. Moreover, this approach was taken in line with strategic purposes "promoting productivity" and "Increasing employees' knowledge and skills" as well as 1. performance evaluation approach through considering results of performance appraisal in appointing those employees who are assigned to be on higher organizational positions or are to be promoted and 2. Training by regarding training courses which employees should successfully pass to be appointed for higher job positions.

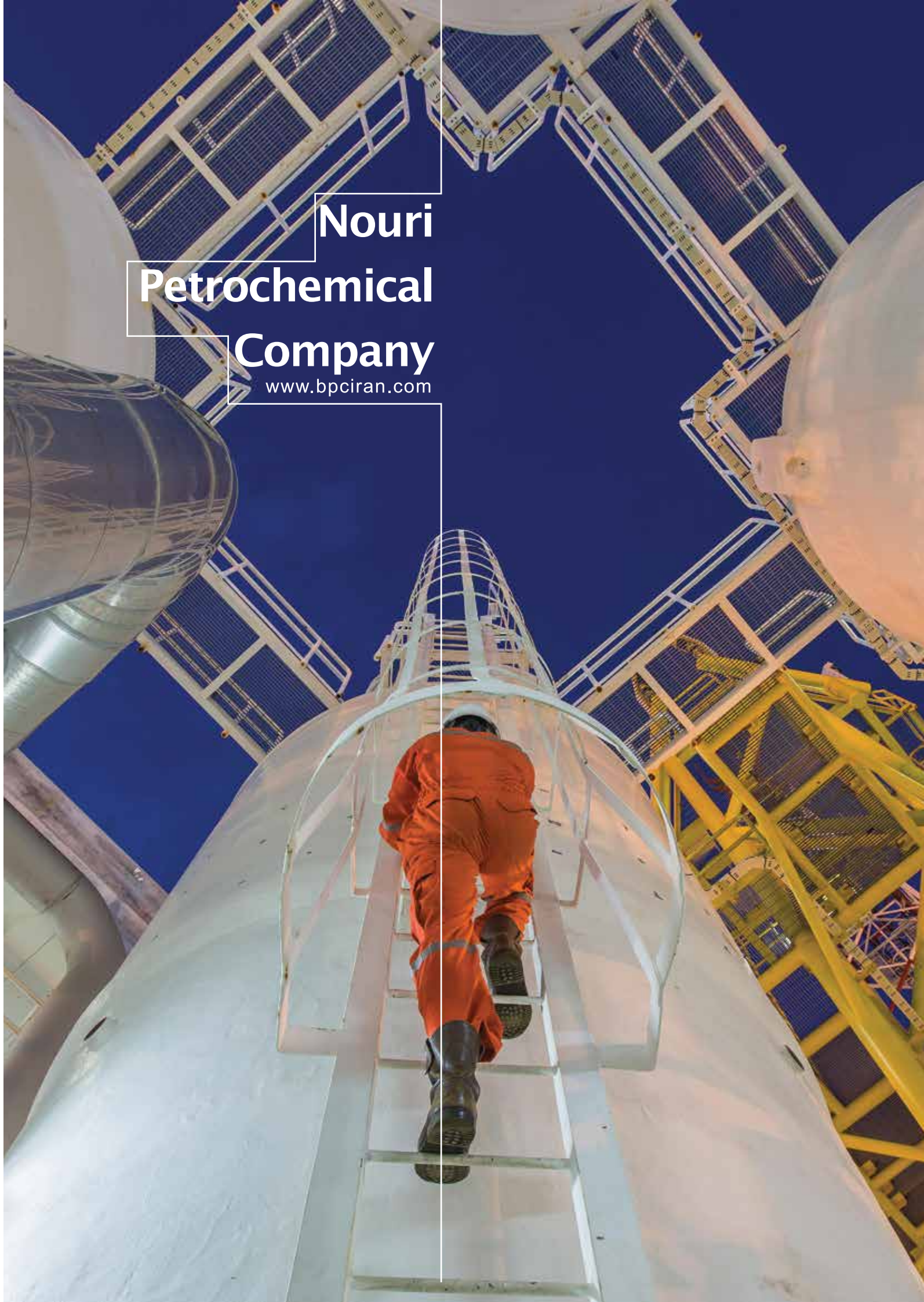
Career path approach has been created in the company since 2000 and was systematized by forming Personnel Committee in 2013. Also, it is based on written employee promotion guidelines in Oil Industry. Accordingly, a committee, named "Personnel Committee" was formed by Nouri Petrochemical Company to implement this approach systematically. The above – mentioned committee consists of CEO, Complex Manager, Personnel Manager, Planning Manager, Human Resources Manager and Head of employee's office. To illustrate, this committee is responsible for making and executing appropriate decisions on employee development based on career path. And, meetings are held by this committee monthly. Career path approach includes to procedures as follows;

**Appointments:** this process is used with the purpose of enhancing employees' job and organizational positions in career path based on written appointment guidelines in Oil Industry.

**Promotions:** this process is applied to improve employees' job grade in career path based on written promotions guidelines in Oil Industry.

In keeping with controlling and measuring the above – mentioned approach, indicators such as "ratio of granted promotions", "ratio of appointments", "level of promotion satisfaction", "level of salary satisfaction" and "productivity of human resources" are defined and controlled yearly by Nouri Petrochemical Company.

Subsequently, the output of the above – mentioned approaches is discussed in Personnel Committees meetings which are held with the presence of organization managers and necessary decisions are made. Moreover, it should be noted that career path approach has been determined and implemented for permanent employees, regarding the defined goals for this approach, it could be considered for temporary employees and has a great impact on employees' performance and motivation. In addition, Nouri Petrochemical Company attempts to expand the scope of career path approach for employees subordinate to Labor Law by defining job classification plan which is being implemented. It is highly important to state that career path approach is applied by Personnel Committee to prevent personal impacts on developing this approach as well as using group wisdom.



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### • Measures Taken in Unifying Payment of Different Types of Employment

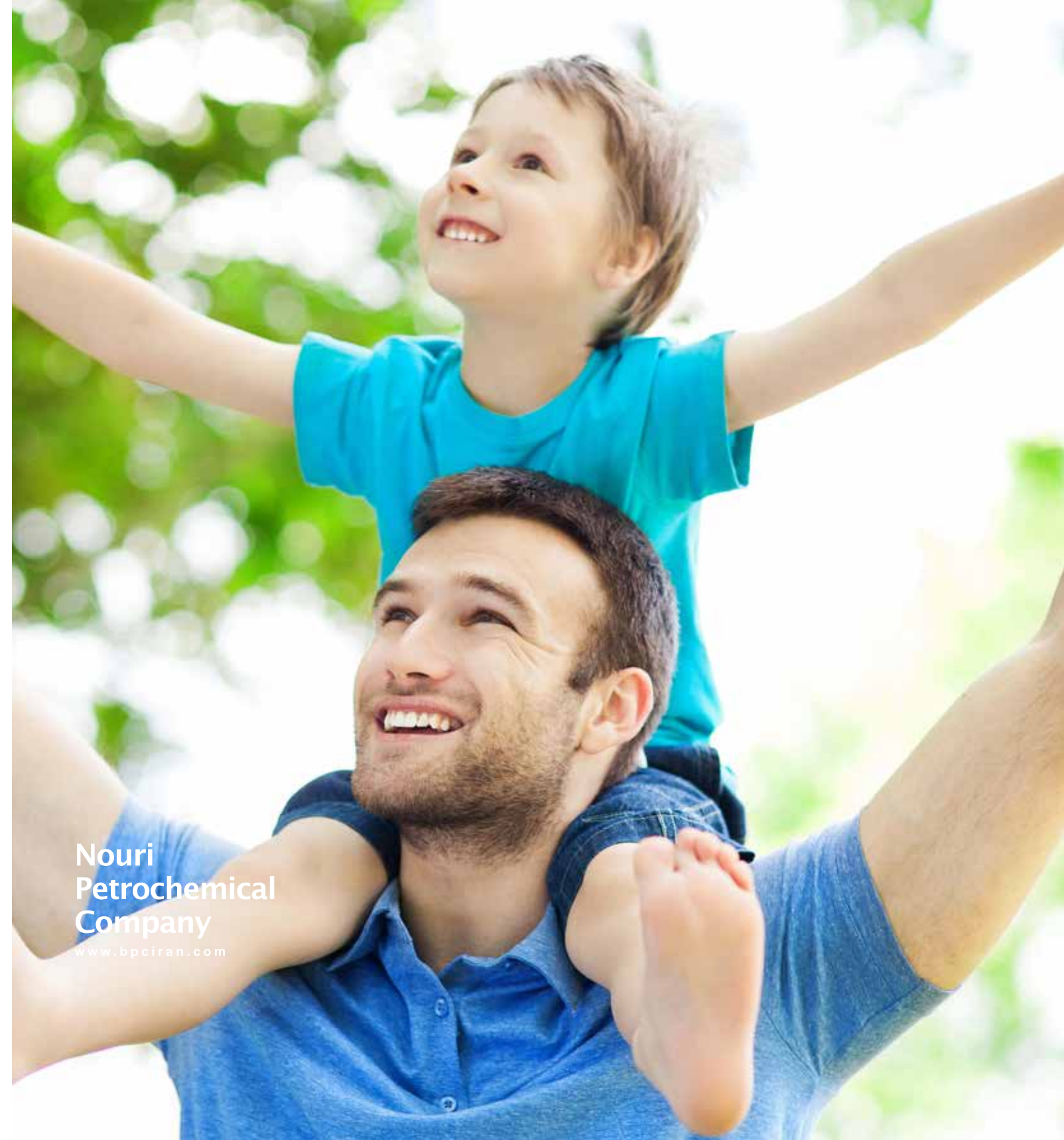
Since 2014, Nouri Petrochemical Company has attempted to unify payments. In this regard, Nouri Petrochemical Company is considered as the first company compared to other similar companies. Consequently, human resources workgroup introduced job classification plan and after final reviewing and confirming the plan, it was proposed to Persian Gulf Petrochemical Industries Company which has signed a contract with one of the companies approved by Ministry of Labor to implement. Presently, it is being applied.

### • Respect for Cultural Diversity & Non Discrimination

Nouri Petrochemical Company, from the beginning of its activities, has been attempted to recruit employees all over the country using recruitment mechanism and following rules & regulations by the government in the field recruitment in Pars Special Economic Energy Zone regardless of ethnicity, religion and gender. To illustrate, employees are classified into four groups, namely, permanent, temporary, fixed – term contract Employees and Employees contractors / contracting (i.e. those employees contracted directly by the company). In some cases, their payments could be different, so that, there would be a sense of discrimination. Consequently, this company has taken several measures cooperating with Persian Gulf Petrochemical Industries Company which resulting in decreasing such differences.

#### Considering Diversity in Various Fields

Field	Type of Service	Example & Evidences
Employees	Recruitment	<ul style="list-style-type: none"> <li>- Recruiting local people</li> <li>- Recruiting qualified people from all over the country</li> <li>- Recruiting females</li> <li>- Regardless of religion in recruitment</li> <li>- Creating equal conditions for recruiting test participants</li> </ul>
Communities	Support	<ul style="list-style-type: none"> <li>- Support creating green space</li> <li>- Support developing communication channels</li> <li>- Support Dolphins of Assaluyeh</li> <li>- Support accepting interns of regional universities</li> </ul>



### • Parental Leave

Nouri Petrochemical Company, like other subsidiaries of Persian Gulf Petrochemical Industries Company, has written programs to support those employees who have become parents. These programs include Maternity Leave. In this regard, giving incentive and compassionate leaves at Nouri Petrochemical Company is as follows;

- Maternity Leave (9 months for female employees) and 14 days for those male employees whose wives have given birth.
- Compassionate, Sick Leaves (member of an employee's immediate family or household dies, or contracts a life-threatening illness or injury, an employee may be able to take compassionate leave).



# Sustainability Report

## Nouri Petrochemical Co.

### • Employee Relationship Management

With the purpose of making effective organizational communication along with organization's strategies, Nouri Petrochemical Company attempted to establish systematic organizational communications and use informing approaches to completely meet vertical & horizontal communication needs in the organization. Accordingly, Nouri Petrochemical Company classified information needs of employees into individual needs, occupational needs and organizational needs. So, the appropriate communication channels have been defined to meet these needs based on parameters such as message type, receiver type, exact time and so on. The approach taken by Nouri Petrochemical Company in communicating with employees is based on approved organizational values, transparency values in reports and key stakeholders' satisfaction. The interactive solutions of company managers with employees and vice versa are shown in Table 5.

### Employee-management relations ways

Managers & Employees Consultation Meetings	Holding annual, seasonal & occasional consultation meetings at different departments or the whole organization, in – person meeting with senior management
Daily Morning Meetings held by Managers & Heads of Organization	Developing organizational communication, appropriately coordinating, exchanging opinions and cooperating in solving organizational problems
Regular Weekly Meetings held by Managers & Employees	Direct communication between managers & employees
Electronic Notification through organizational portal	With the aim of expediting notification, increasing accessibility, and completely removing paper from notification system, delivering in-company instant news with employees' visibility
Individual counseling by a psychologist in the company	To develop organizational communication & deeper investigating communication field in the company
Sending SMS	Prompt notification to all employees, especially in emergency cases
Organizational & Family events	Holding religious, national & organizational events in the company & cultural center
Letter writing using special software in the form of office automation	Transferring information & creating employee – friendly workplace



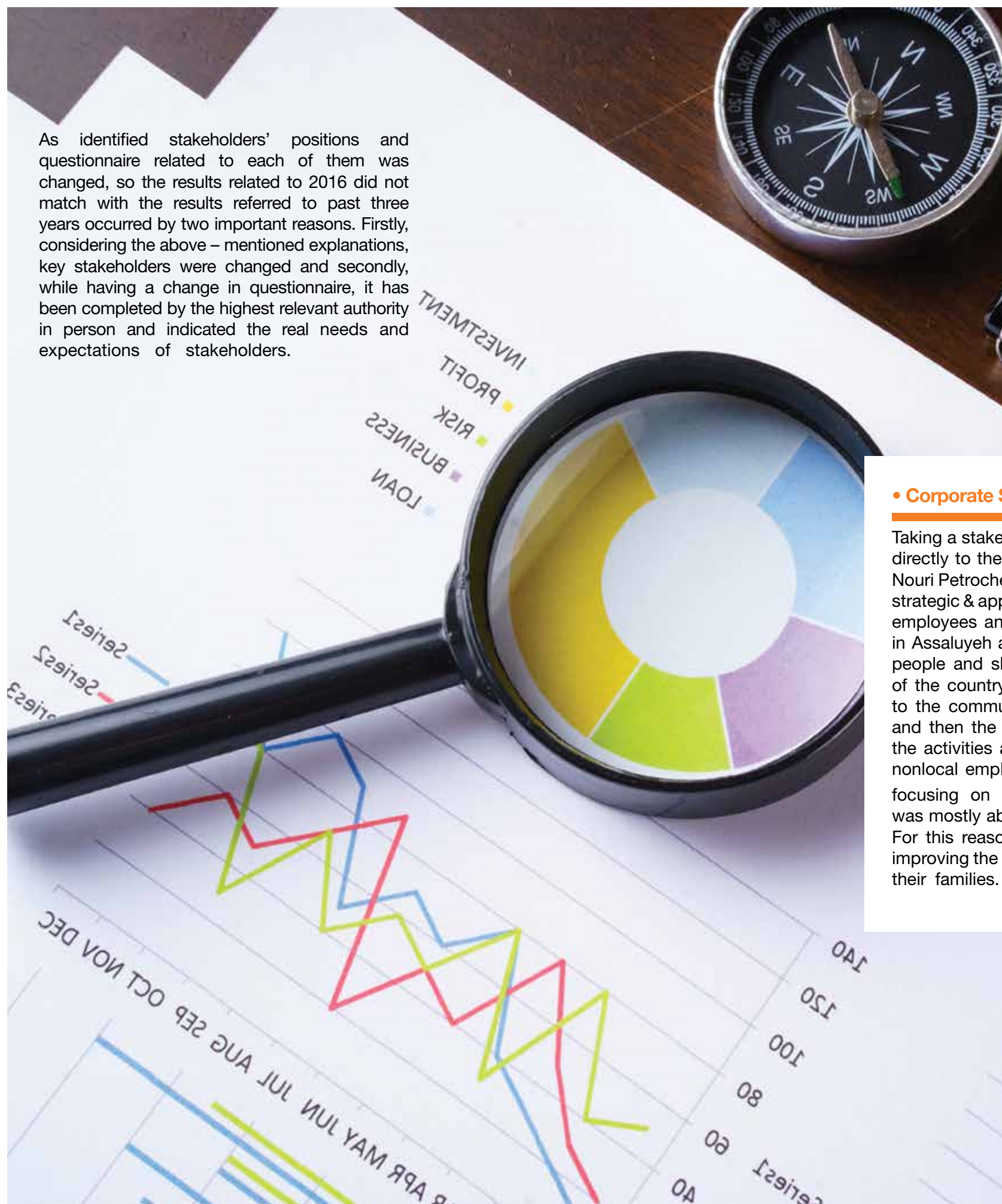
### • ISO – 26000 Project

Since 2016, on the basis of studies and the importance of sustainable development as well as feedback on evaluating organizational excellence, Social Responsibility has been placed on the agenda of Strategic Council as an improvement opportunity in Nouri Petrochemical Company. In order to implementing this approach, it was obligated to establish ISO – 26000 project to integrate Corporate Social Responsibility Approach at the level of company. For this reason, establishing ISO – 26000 project has been defined and using consultative services under contract has been started. It should be noted that this project seeks to integrate social responsibility into all decisions and activities.

According to this standard, stakeholders are very important, so in the first step, Nouri Petrochemical Company identified stakeholders and then analyzed the impact of each stakeholder on company's business and the impact of the company on each of them. Subsequently, the quadratic matrix of importance & benefit was extracted indicating the division of stakeholders to the extent to which they effect on company and how to make decisions on how to deal with stakeholders. Accordingly, key stakeholders of the company were identified, in which all stakeholder had been considered the same during past three years, currently, each of those stakeholders had a different position in terms of significance in the importance matrix. In the next step, it was obliged that stakeholder identity matrix card should be provided for each stakeholder on the basis of its position in the above – mentioned matrix.

All of these steps while implementing were presented and carried out in Strategic Council. One of the activities done in this part was providing questionnaire for stakeholders considering the importance matrix. Therefore, for the first year, it was obliged to revise that questionnaire related to the community which used for the past three years and completed by the highest relevant authority of affiliated organization of identified stakeholders or people as identified stakeholders in person.

As identified stakeholders' positions and questionnaire related to each of them was changed, so the results related to 2016 did not match with the results referred to past three years occurred by two important reasons. Firstly, considering the above – mentioned explanations, key stakeholders were changed and secondly, while having a change in questionnaire, it has been completed by the highest relevant authority in person and indicated the real needs and expectations of stakeholders.



### • Corporate Social Responsibility for the Community

Taking a stakeholder approach links social responsibilities directly to the sustainability of a business. In this regard, Nouri Petrochemical Company has defined and developed strategic & approaches relating to its two key stakeholders, employees and community. As this company is situated in Assaluyeh and this area was formerly devoted to local people and skilled labor was recruited from other parts of the country, in considering responsible affairs related to the community, the focus was mostly on employees and then the local community. For this reason, most of the activities are aimed at improving living conditions of nonlocal employees and their families.

focusing on responsible affairs. Community-related, it was mostly about the staff and then the local community. For this reason, the bulk of the measures are aimed at improving the living conditions of non-indigenous staff and their families.



## • Managing Social Responsibility Programs

The approach taken by Nouri Petrochemical company in cooperating with local community is on the basis of making decisions and collective action. One of the most important issues to be focused on in Governing Council of Direct Managers of Petrochemical Companies located in Pars Special Economic Energy Zone is the quality & quantity of Petrochemical Companies' participation in allocating funds for social programs & projects. To explain, in the first step, the Governing Council determines and finalizes annual social support programs through receiving opinions of key community representatives in social affairs such as Governorate, the Relief Committee, Welfare Organization & NGOs. In the next step, according to the size of each of petrochemical company, its financial contribution is determined and finally, Pazargad Non – Industrial Operation Services Company is considered as a responsible for implementing social projects and programs. This mechanism has been designed and implemented with the aim of synergizing and integrating existing resources and using them more effectively in addressing community challenges and needs. In keeping with social responsibility and its organizational values, Nouri Petrochemical Company takes some measures to support the community as shown in Table 4. Some of these indexes are as follows;

— Budget allocation & Social Costs

— Number of university students, interns & apprentices

— Number of visitors to Complex

— Expeditionary Teams to Sport Competitions

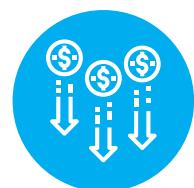
— Satisfying with working with public benevolent institutions

— Being satisfied with environmental activities

— Being satisfied with developing green spaces

— Number of Sport Teams

— Sports rank gained by the Company



## Monitoring Indexes for Social Activities

	Activity	Reason of Activity	Reason of Activity
1	Contributing to the cost of road construction in this region	Increasing qualitative & quantitative of the roads in this region and their safety factor	CEO
2	Contributing to the cost of Medical Centers in this region	Improving the quality of medical services provided by Healthcare	Human Resources
3	Supporting Persian Gulf Dolphins Conservation Project	Supporting the Environment	HSE
4	Supporting Knowledge enterprises in the field of localizing catalysts	Improving level of companies' empowerment	Research & Technology
5	Participating in benzene vapor recycling project	Preventing hazardous pollutants emission	Technical Services
6	Holding Sports Competitions	Increasing level of vitality in the youths & athletes and level of health in community	Human Resources
7	Public Assistance to Schools & the Relief Committee	Improving level of livelihood in community & educational opportunities in this region	Public Relations
8	Membership in Petrochemical Entrepreneurship Association	Supporting Non – Governmental Organizations (NGOs)	Business Affairs
9	Supporting International Green Film Festival	Improving Environment Protection Culture	Public Relations / HSE
10	Attending periodic maneuvers in this region	Improving preparedness in response to emergencies	HSE
11	Attending fire extinguishing in ponds of Gas Refineries	Using experiences gained in Safety & Firefighting	HSE
12	Collaborating with universities of this region & job services management for interns & apprentices	Improving knowledge, competency and skills of university graduates & young people in this region to increase employability	Human Resources / Training



## • Measuring Community Satisfaction

In keeping with managing environmental, economic and social consequences effectively, Nouri Petrochemical Company has taken various approaches during the years of commercial production, and different steps to comprehend, anticipate and respond to different stakeholders' needs and expectations. One of the steps taken is surveying stakeholders. It should be stated that this step has been implemented in the organization with responsibility of Social Responsibility Working Group, as one of the eleven Excellence Working Groups since 2014. Moreover, this step is based on a model of Social Responsibility Standard (ISO – 26000) which finally provided community identification, index, questionnaire and community survey while determining 20 stakeholder groups in a total of taking 10 steps.

Along with considering the community as well as values on protecting environment with the purpose of understanding the community's needs, "Community Survey Approach" has been taken by Nouri Petrochemical Company which designed and its validity & reliability were assessed by Social Responsibility Group using survey forms yearly.

As a matter of fact, this approach has been implemented since 2011. Regarding the method of surveying community, every year the Public Relations Department attempts to distribute, collect and analyzes survey forms from the beginning of year. This approach is done using 5 main indexes as follows;

1. Environmental Consequences
2. Company Reputation
3. Social Consequences
4. Workplace Consequences
5. Awards & Media Coverage

Moreover, there are 22 sub – indicators are monitored and assessed. Then, conducted surveys is being analyzed in Social Responsibility Committee and if it is needed to do corrective activity or have an improvement plan, required activities are done. Surveying community method was reviewed completely in 2015. To illustrate, in reviewing this method, the new approach is on the basis of learning from Social Responsibility related to Standard ISO 26000. The reason for opting the above – mentioned approach by Nouri Petrochemical Company is that this approach was first introduced in the sixth festival of Public Relations in Oil Industry in 2017 and could achieved the second place in the field of social studies, research, survey and content analysis.

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Considering the acceptance of this approach in Oil Industry, Nouri Petrochemical Company emulated this approach and has applied in the field of social responsibility. Therefore, predicting stakeholders' needs and expectations have been improved by taking social approach at Nouri Petrochemical Company which resulted in understanding and required planning to react appropriately.

According to above – mentioned issues as well as the output of ISO – 26000 project which was finalized in 2017, the following table shows a list of the most important plans and projects done or in progress by this company with the aim of empowering local community;

### The Most Important Activities Done by Nouri Petrochemical Company for Local Communities

Approach	Related Activities
<b>Implementing &amp; Establishing</b>	Forming Social Responsibilities Committee, selecting advisor & holding meetings for providing the first GRI report and training courses along with implementing ISO – 26000 Standard
<b>Cultural, Technical &amp; Scientific Visits</b>	Setting visits of different groups university professors & students, students of state authorities (parliamentarians, ministry officials, employees' families), coordinating & assigning company experts to give explanation to visitors, providing tuition to visit providers, supporting camps & local students events, setting visits of students & university professors from Nouri Petrochemical Company
<b>Internship Admission</b>	Internship admission from different universities & internship courses for universities in different majors at Nouri Petrochemical Company, providing required services and facilities such as work clothes, accommodations and transportation, giving necessary information to interns and company in some training courses
<b>Participating in Public Utilities in Assaluyeh</b>	Partaking in cultural events & infrastructure plans (road construction, highway lighting, etc.), Participating in improving educational, research & religious spaces, Supporting artistic activities by Culture & Islamic Guidance of city & province, Supporting tunnel lighting Jam – Assaluyeh road & Supporting in holding Social events
<b>Participating in Environmental Services</b>	Making an agreement with General Directorate of Environmental Protection Agency of Bushehr, implementing three phases, signing a study contract on conserving Persian Gulf Humpback Dolphins, publishing a book entitled "the concept of sustainability from environmental perspective", doing three scientific articles (under publishing), supporting Green Film Festival
<b>Providing Public Grants</b>	Providing Public Grants to Charities such as the Relief Committee, the Welfare Organization and those who are in need through charity funds available in Charity Organizations



## GRI Content Index

Disclosure	Description	Level of coverage	Page
<b>GRI 102: General Disclosures</b>			
Organizational Profile			
102-1	Name of the organization	Full	Front Cover
102-2	Activities, brands, products, and services	Full	14,16
102-3	Location of headquarters	Full	16
102-4	Location of operations	Full	16
102-5	Ownership and legal form	Full	60
102-6	Markets served	Full	22
102-7	Scale of the organization	Full	17,21,68,114
102-8	Information on employees and other workers	Full	17114
102-9	Supply chain	Full	44,76-77
102-10	Significant changes to the organization and its supply chain	Full	Non
102-12	External initiatives	Partial	25
102-13	Membership of associations	Full	16
<b>Strategy</b>			
102-14	Statement from senior decision-maker	Full	10-11
102-15	Key impacts, risks, and opportunities	Full	28-43
<b>Ethics and Integrity</b>			
102-16	Values, principles, standards, and norms of behavior	Partial	30,64
<b>Governance</b>			
102-18	Governance structure	Full	59,61,63
102-19	Delegating authority	Full	63,69
102-20	Executive-level responsibility for economic, environmental, & social topics	Full	63,69
102-21	Consulting stakeholders on economic, environmental, & social topics	Partial	50,53
102-22	Composition of the highest governance body and its committees	Partial	61,62
102-23	Chair of the highest governance body	Full	61
102-25	Conflicts of interest		62
102-26	Role of highest governance body in setting purpose, values, and strategy	Full	62
102-29	Identifying and managing economic, environmental, and social impacts	Partial	58,62
102-31	Review of economic, environmental, and social topics	Full	58
102-32	Highest governance body's role in sustainability reporting	Full	63
102-35	Remuneration policies		62

Disclosure	Description	Level of coverage	Page
Stakeholder Engagement			
102-40	List of stakeholder groups	Full	46-47
102-42	Identifying and selecting stakeholders	Full	48
102-43	Approach to stakeholder engagement	Full	48-58
102-44	Key topics and concerns raised	Full	50-53
Reporting Practice			
102-45	Entities included in the consolidated financial statements	Full	6
102-46	Defining report content and topic Boundaries	Full	6
102-47	List of material topics	Full	36-41
102-48	Restatements of information	N-A	-
102-49	Changes in reporting	Full	6
102-50	Reporting period	Full	6
102-51	Date of most recent report	Full	6
102-52	Reporting cycle	Full	6
102-53	Contact point for questions regarding the report	Full	6
102-54	Claims of reporting in accordance with the GRI Standards	Full	6
102-55	GRI content index	Full	142-147
102-56	External assurance	Full	6
<b>GRI 201: Economic Performance</b>			
201-1	Direct economic value generated and distributed	Full	68
<b>GRI 203: Indirect Economic Impacts</b>			
103-1	Explanation of the material topic and its Boundary	Full	137-138
103-2	The management approach and its components	Full	138
103-3	Evaluation of the management approach	Partial	140
203-1	Infrastructure investments and services supported	Full	139-141
203-2	Significant indirect economic impacts	Partial	76-77
<b>GRI 204: Procurement Practices</b>			
103-1	Explanation of the material topic and its Boundary	Partial	76-77
103-2	The management approach and its components	Partial	76-77
103-3	Evaluation of the management approach	Partial	76-77
204-1	Proportion of spending on local suppliers	Partial	76-77



Disclosure	Description	Level of coverage	Page
<b>GRI 205: Anti-corruption</b>			
103-1	Explanation of the material topic and its Boundary	Partial	71
103-2	The management approach and its components	Partial	71
103-3	Evaluation of the management approach	Partial	71
205-1	Operations assessed for risks related to corruption	Partial	71
205-2	Communication and training about anti-corruption policies and procedures	Partial	71
<b>GRI 301: Materials</b>			
301-1	Materials used by weight or volume	Full	21
<b>GRI 302: Energy</b>			
103-1	Explanation of the material topic and its Boundary	Full	90
103-2	The management approach and its components	Full	90
103-3	Evaluation of the management approach	Full	90
302-3	Energy intensity	Partial	93
302-4	Reduction of energy consumption	Full	91-96
<b>GRI 303: Water and Effluents</b>			
103-1	Explanation of the material topic and its Boundary	Partial	98-100
103-2	The management approach and its components	Partial	98-100
103-3	Evaluation of the management approach	Partial	98-100
303-1	Interactions with water as a shared resource	Partial	98-100
303-2	Management of water discharge-related impacts	Partial	100
<b>GRI 304: Biodiversity</b>			
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Partial	106-110
304-3	Habitats protected or restored	Full	106-110
<b>GRI 305: Emissions</b>			
103-1	Explanation of the material topic and its Boundary	Partial	97
103-2	The management approach and its components	Partial	97
103-3	Evaluation of the management approach	Partial	97
305-7	Nitrogen oxides (NOX), sulfur oxides (SOX), & other significant air emissions	Partial	97

Disclosure	Description	Level of coverage	Page
<b>GRI 306: Effluents and Waste</b>			
103-1	Explanation of the material topic and its Boundary	Full	100-102
103-2	The management approach and its components	Full	100-102
103-3	Evaluation of the management approach	Full	100-102
306-1	Water discharge by quality and destination	Full	100-101
306-2	Waste by type and disposal method	Full	100-105
306-4	Transport of hazardous waste	Partial	100-105
<b>Social</b>			
<b>GRI 401: Employment</b>			
103-1	Explanation of the material topic and its Boundary	Partial	114-115
103-2	The management approach and its components	Partial	114-115
103-3	Evaluation of the management approach	Partial	114-115
401-1	New employee hires and employee turnover	Partial	114-115
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Partial	126,132
401-3	Parental leave	Partial	133
<b>GRI 402: Labor-Management Relations</b>			
103-1	Explanation of the material topic and its Boundary	Partial	128-129
103-2	The management approach and its components	Partial	128-129
103-3	Evaluation of the management approach	Partial	128-129
402-1	Minimum notice periods regarding operational changes	Partial	128-129
<b>GRI 403: Occupational Health and Safety</b>			
103-1	Explanation of the material topic and its Boundary	Full	116
103-2	The management approach and its components	Full	116
103-3	Evaluation of the management approach	Full	116
403-1	Occupational health and safety management system	Full	123
403-2	Hazard identification, risk assessment, and incident investigation	Partial	120-123
403-3	Occupational health services	Full	120-123
403-4	Worker participation, consultation, and communication on occupational health and safety	Partial	102
403-5	Worker training on occupational health and safety	Partial	105
403-6	Promotion of worker health	Partial	120-123
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Partial	106-107
403-8	Workers covered by an occupational health and safety management system	Full	All Workers



Disclosure	Description	Level of coverage	Page
<b>GRI 404: Training and Education</b>			
103-1	Explanation of the material topic and its Boundary	Full	124,130
103-2	The management approach and its components	Full	124,130
103-3	Evaluation of the management approach	Full	124,130
404-1	Average hours of training per year per employee	Full	125
404-2	Programs for upgrading employee skills and transition assistance programs	Full	125
404-3	Percentage of employees receiving regular performance and career development reviews	Partial	130
<b>GRI 405: Diversity and Equal Opportunity</b>			
103-1	Explanation of the material topic and its Boundary	Partial	130
103-2	The management approach and its components	Partial	130
103-3	Evaluation of the management approach	Partial	130
405-1	Diversity of governance bodies and employees	Partial	114
<b>GRI 406: Non-discrimination</b>			
103-1	Explanation of the material topic and its Boundary	Partial	132
103-5	The management approach and its components	Partial	132
103-3	Evaluation of the management approach	Partial	132
<b>GRI 413: Local Communities</b>			
103-1	Explanation of the material topic and its Boundary	Partial	137-138
103-2	The management approach and its components	Partial	137-138
103-3	Evaluation of the management approach	Partial	137-138
413-1	Operations with local community engagement, impact assessments, and development programs	Full	139-141
<b>GRI 416: Customer Health and Safety</b>			
103-1	Explanation of the material topic and its Boundary	Full	72-73
103-2	The management approach and its components	Full	72-73
103-3	Evaluation of the management approach	Full	72-73
416-1	Assessment of the health and safety impacts of product and service categories	Full	74-75
<b>GRI 417: Marketing and Labeling</b>			
103-1	Explanation of the material topic and its Boundary	Full	74-75
103-2	The management approach and its components	Full	74-75
103-3	Evaluation of the management approach	Full	74-75
417-1	Requirements for product and service information and labeling	Full	75
417-2	Incidents of non-compliance concerning product and service information and labeling	Full	Non
417-3	Incidents of non-compliance concerning marketing communications	Full	Non



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