



# UN Global Compact Communication on Progress 2012



*Providing quality education for disadvantaged communities remains the centrepiece of Pakistan Petroleum Limited's Corporate Social Responsibility Programme*



**Pakistan Petroleum Limited**



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## Pakistan Petroleum Limited

PIDC House, Dr. Ziauddin Ahmed Road, Karachi-75530, Pakistan  
Tel: (021) 35651480-98, 35657730-39, 35681391-95 & 35683853-57  
UAN: (021) 111-568-568, Fax: 92-21-35680005 & 92-21-35682125

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### ***United Nations Global Compact Communication on Progress 2012***

#### **Message from the Managing Director & Chief Executive Officer**

As a responsible corporate entity, we at Pakistan Petroleum Limited (PPL) reiterate our commitment to the principles of the United Nations Global Compact (UNGC). The company remains steadfast in sustaining good governance practices, including sustainable socio-economic development of disadvantaged communities, environmental conservation and high standards of health and safety as well as human resource development.

Being a frontline Exploration and Production Company, PPL has executed many initiatives through its Corporate Social Responsibility (CSR) programme, focusing on healthcare, education, livelihood generation, infrastructure development and post-disaster relief and rehabilitation for marginalized communities within and beyond its operational areas.

The company's efforts have been widely acknowledged, most notably by the Pakistan Centre for Philanthropy, which has declared the company as the largest corporate giver in terms of volume of donations, as well as the Management Association of Pakistan, Employers' Federation of Pakistan and the South Asian Federation of Accountants Award.

PPL strives to minimize the environmental impact of its operations and enhance quality of outputs. Thirteen company field and facilities are certified for ISO 14001 Environment Management System (EMS), Occupational Health and Safety Assessment Series (OHSAS) 18001 and ISO 9001 Quality Management System. Audits of remaining facilities are underway. As part of PPL's on-going efforts to ensure safety and a hazardous-free environment for staff and contractors, the company surpassed its 2011 target for Loss Time Illnesses and Injuries rate of 0.38 percent, achieving 0.02 percent.

The company maintains an equitable approach by providing equal opportunities for employment, growth, benefits and compensation and facilitates constructive interface between staff and management in order to work together to further improve the working environment. PPL conducts and participates in various reputable organizational surveys to improve processes and address emerging needs.

As we detail progress for the reporting year, our real commitment to excellence lies in the continuous effort to ensure a sustainable future for our stakeholders through ongoing improvements in operations and governance systems as defined in the UNGC principles.

**ASIM MURTAZA KHAN  
MANAGING DIRECTOR & CHIEF EXECUTIVE OFFICER**

# Principle 1



Business should support and respect the protection of internationally proclaimed human rights.



## Commitment

Pakistan Petroleum Limited (PPL) respects the dignity and rights of its human resource. Through our Corporate Social Responsibility (CSR) Programme, we also support the right to education, healthcare and basic civic amenities for communities.





## 1 Strategic System for Organizational and Human Development

### ACTION

#### Organizational Surveys

##### Performance

**PPL conducts and participates regularly in organizational surveys, enabling the company management to review and adopt best practices from benchmark companies. This proactive approach helps in continuous improvement of systems and procedures.**

- ▶ PPL participates in various countrywide Human Resource (HR) benchmarking surveys to assess prevailing and emergent trends. The findings enable the company to align its HR system with leading companies and consolidate best practices already followed by the company.
- ▶ After conducting the Employee Satisfaction Survey in 2010, PPL is participating in an external survey as a follow-up to identify and prioritize areas of improvement through benchmarking against other organizations.
- ▶ As a contender for the 2008 award, PPL participated in Management Association of Pakistan's (MAP) assessment process to evaluate and confirm its adherence to best practices. PPL won the prestigious MAP Award for four consecutive years from 2006 to 2009.
- ▶ The company sends its head office staff on regular field visits to seek their opinion and suggestions for work-related improvements. Besides, posting of staff between fields and head office on a rolling-basis has been further streamlined during 2011. To this end, a number of staff were moved from head office to fields and vice versa to enrich their experiences.
- ▶ PPL was adjudged the winner of excellence award for 'Best Management and Decent Work Practices' by the Employers' Federation of Pakistan in January 2012.

## 2 Industrial Relations and Employees

### ACTIONS

#### Fair Investigation Procedures

##### Performance

**PPL protects employee rights, ensuring equitable treatment and opportunity for all to voice their views.**

- ▶ The company has an effective policy for redressal of staff grievances, if any.
- ▶ Based on laws relevant to its various locations, PPL follows the Standing (Orders) Ordinance 1968 for official reprimand of staff.

#### Benefits

##### Performance

**The company provides its staff with competitive remuneration packages as well as strives to facilitate enabling working environment with ample capacity development and career progression opportunities.**

- ▶ In line with the Companies Profits (Worker's Participation) Act 1968, PPL contributes 5 percent of its net profit to the Workers Participation Fund.
- ▶ PPL follows the Employees Old Age Benefits (EOB) Act 1976, contributing 5 percent of minimum basic salary to EOB institutions with employees participation of 1 percent.
- ▶ The company pays Statutory Bonus under Section 10-C of the West Pakistan Industrial and Commercial Employment (Standing Order) Ordinance 1968 as well as Annual Settlement Bonus to non-management staff.
- ▶ Annual Leave Fare Assistance is given to non-management staff in addition to monthly remuneration.
- ▶ PPL also extends loans to staff for house construction/renovation and purchase of vehicle.
- ▶ The company offers 13 scholarships to children of permanent workers, with four scholarships for post-intermediate and professional and 9 for post-matriculation education on an annual basis.
- ▶ Free bachelor accommodation along with necessary utilities is given to field-stationed staff.
- ▶ Gratis Haj and Umrah facilities are provided to workers.
- ▶ PPL provides pick-and-drop transport facility to women staff.
- ▶ For senior executives and women employees, the company provides a nutritious and balanced lunch facility at the head office.





## Employee Recognition

### Performance

**PPL follows fair and transparent policies and procedures to recognize and reward high standards of performance and enhance staff motivation.**

- ▶ Performance Excellence Awards are given on an annual basis to employees in recognition of their outstanding achievements in both tangible and intangible categories. The company recognizes and rewards individual efforts for extraordinary performance, innovation, creativity, cost savings, productivity gains and complexity reduction. The scheme also sets out to establish role models within the organization that other employees can emulate.
- ▶ PPL considers human capital its premium asset and acknowledges longevity of service, ranging from 15 to 40 years, through annual long service awards.
- ▶ The company arranges farewells for retiring staff in appreciation of their services.

## Healthy Entertainment for Employees

### Performance

**PPL attaches great importance to providing sports facilities and entertainment for staff.**

- ▶ PPL encourages sports among head office and field employees such as the Annual Interlocation Cricket Tournaments. Besides the company has teams for various sports that participate in contests/ matches with other organizations.
- ▶ PPL organizes annual golf tournament for employees and other enthusiasts. The 7<sup>th</sup> tournament in this series was held in February 2012.
- ▶ PPL has a dedicated Exploration Library that subscribes to leading industry journals to enhance staff knowledge.
- ▶ Current reading material, including newspapers, magazines and periodicals are provided to keep staff updated on latest trends and information.
- ▶ The company's monthly newsletter *Progress*, now in its 56<sup>th</sup> year of publication regularly reports on company activities and industry-related news. Since January 2011, the Urdu version of *Progress* has been initiated to increase reach and update staff and stakeholders who were otherwise not able to get first-hand information due to language barrier.
- ▶ PPL maintains a fully-equipped health and fitness facility to keep its employees mentally and physically fit. Head Office Sports Club remains available for staff recreation during lunch break or after working hours. The club at Sui Gas Field also has a jogging track, badminton, tennis and squash courts and a swimming pool for staff use. Besides, the company has proper indoor games/ recreation facilities at all field locations. The company also organizes indoor games competition among the head office employees.
- ▶ PPL organizes musical and other cultural programmes for its employees.

- ▶ Company management and staff celebrate religious and cultural festivals as well as national days.

## Preventing Forcible Displacement of Individuals

### Performance

**Due to its strict adherence to prescribed laws, PPL has never had a case of forcible displacement of employees.**

## Employment Policy for Handicapped and Disabled People

- ▶ PPL follows the Disabled Persons (Employment and Rehabilitation) Ordinance 1981 and ensures employment of handicapped personnel.
- ▶ In line with the Workmen Compensation Act in matters related to disability, alternate job assignments are given to disabled staff.

## 3 Employee Safety and Security

### ACTIONS

## Safe Working Conditions

### Performance

**Employee safety and security is one of PPL's top priorities. The company has dedicated Security and Health, Safety and Environment (HSE) departments to ensure hazard-free working conditions and has taken the following initiatives to help protect its employees from risky situations and conditions:**

- ▶ Safety alerts and travel advisories are sent regularly to employees.



- ▶ Employees are provided personal protective equipment (PPE) and clothing according to the nature of their job.
- ▶ Safety and fire drills are regularly conducted as per HSE requirements at head office and all field locations.
- ▶ HSE awareness and training sessions are held regularly in English and Urdu on fire fighting, incident investigation and reporting and permit-to-work system.
- ▶ Security passes are compulsory for PPL employees at the head office and field locations.
- ▶ HSE procedure on 'Hazard Identification, Risk Assessment and Management' is developed and distributed to all concerned. Field HSE representatives provide training to relevant staff for conducting risk assessment of routine and project activities at PPL locations.
- ▶ Head Count System in the form of T-Card is being implemented at all PPL fields. As a quick and accurate estimation of personnel's location at various field sites, the T-Card boards are already in use at Kandhkot, Mazarani, Adhi, Chachar and Hala fields.

## Employee Travel Safety

### Performance

**PPL regularly arranges training programmes on defensive and evasive driving. Awareness programme on road sense and safety has been initiated for company staff.**

- ▶ Any unsafe driving practices, travel route issues, vehicle or employee complaints regarding transport are reported to the Administration Department for necessary countermeasures.
- ▶ Wearing seat belts is mandatory for company transport drivers and employees using company vehicles.
- ▶ All PPL employees are insured while travelling locally, domestically or internationally.
- ▶ Use of mobile phones is prohibited while driving company vehicles.
- ▶ First aid boxes and fire extinguishers are placed in all company vehicles.

## 4 Health

### ACTIONS

## Healthy Environment for Employees

### Performance

**PPL's goal is to support a safe and healthy workplace by enhancing staff health and well-being.**

- ▶ Periodic check-ups are carried out to check fire extinguishers, fire alarms and sprinklers at all field locations.
- ▶ Assessment of Occupational Health, Safety and Environment (OHSE) performance against identified Key Performance Indicators, including Loss Time Injury Illness target rate for the year, PPE compliance by management, non-management and contract staff in routine and project activities and implementation of annual work plans, is undertaken through regular monitoring and conducting awareness sessions.
- ▶ As a result of rigorous planning and implementation of HSE procedures at all company locations, PPL was able to surpass its 2011 target Loss Time Illnesses and Injuries rate of 0.38 percent, which was actually 0.02 percent.

## Basic Health Facilities

### Performance

**PPL extends a comprehensive health plan and medical policy to employees and their families. The company has qualified doctors for providing medical consultation and treatment in the head office and field locations.**

- ▶ The company provides medical assistance to all employees, including their immediate family, and pensioners as per medical policy.



- ▶ PPL maintains a city clinic in Karachi to ensure easy access for its employees and their families. Besides, PPL has a full-fledged hospital located within the premises of the Sui Gas Field. At other company fields and locations, Kandhkot, Adhi, Mazarani, Chachar and Adhi fields, proper arrangements for emergency medical care are in place.
- ▶ PPL follows the Factories Act – 1934, Mines Act – 1923 and Oil and Gas (Safety in Drilling and Production) Regulations – 1974, which include employee personal hygiene, environment, emergency medical assistance and periodic medical checkups.
- ▶ Health awareness sessions are regularly conducted by company doctors and guest consultants for informing and updating staff on preventive measures and treatment of common diseases, including high blood pressure and obesity, and outbreaks such as dengue.
- ▶ Ex- gratia payments are made to staff in case of prolonged sickness.
- ▶ Clean drinking water is provided to staff at all locations.

## 5 Corporate Social Responsibility

PPL stands committed to community development in education, health, infrastructure development, livelihood generation and post-disaster rehabilitation and has allocated minimum 1.5 percent of its pre-tax profit for CSR activities.

The company spent around Rs. 844 million for CSR initiatives during July 2010 to June 2011 and Rs. 746 million during July 2011 to March 2012, which is over and above its minimum benchmark.

### ACTIONS

#### Education

##### Performance

**PPL assigns top priority to promoting education in some of the country's most remote areas.**

- ▶ The company has been providing quality education to children of company employees and local communities at Sui Model School (SMS) since 1957. SMS was upgraded to girls' college in 2009. Currently, the college offers education to about 35 girls and the school caters to 2800 students both boys and girls.
- ▶ To promote a reading culture at the local level, PPL has constructed public libraries at various towns, especially those where the company initiated exploration efforts. During 2010-2011, PPL constructed a library and an auditorium at Dadhar Town, Balochistan, which was furnished during 2011-2012.
- ▶ The company earlier constructed and operationalized the first ever Computer Training Centre and Library (CTCL) at Sui in 2010 for general public. PPL engaged Kalsoft, an Information Technology company, to operate the centre. So far, 200 local students, in three batches, have completed three-month basic computer course. Since January 2011, CTCL has offered a six-month Advanced Course in Information Technology (ACIT). 120 students, 60 in each batch, have completed ACIT during 2011, bringing the total number of computer literates to over 300, trained through CTCL. Besides, CTCL also houses a reading area where books and selected magazines are provided. Over 450 residents have been registered as regular visitors to the library.
- ▶ The company provides free-of-cost transport facility to students of Taaleem Foundation Grammar School (TFGS) and Federal Government (FG) Public School, Sui.
- ▶ In order to encourage competent and professional teachers from other areas to teach at TFGS, PPL is constructing a staff hostel within the TFGS premises. The hostel is built with an investment of Rs. 14 million. Moreover, PPL is also constructing additional classrooms at TFGS to address the issue of large classes due to high enrolment rate.
- ▶ The company constructed academic blocks at Government Girls High School, Dhong and Government Boys High School, Nabab Janjua. Besides, sanitary facilities were built at Government Boys High School Nabab Juba and Miana Mora near Adhi Field. These facilities were constructed with an investment of Rs. 0.764 million. Besides, the company also constructed school building for Government Girls Primary School, Sunjer Khan Junejo with an investment of Rs. 0.188 million and a stadium at Government Boys High School Nabab Janjua near Adhi Field at a cost of Rs. 2.309 million.
- ▶ PPL regularly provides scholarships for students residing around its operational fields, especially in District Dera Bugti, to enable them to acquire quality education at renowned institutions. To this end, a



scholarship programme was initiated in 2005 to support both boys and girls pursuing higher professional education in renowned universities/ colleges across the country. Later in 2009, the scholarship programme was expanded for students living around other producing assets. To date, the higher professional scholarship has benefited more than 80 students in District Dera Bugti and about 15 students in districts Kashmore, Sanghar and Kamber-Shahdadkot.

- ▶ A four-year scholarship programme for students of District Dera Bugti and adjoining districts has recently been initiated. Under this programme, 10 scholarships from grade IX to XII will be provided to students already enrolled at any renowned and well-reputed educational institution across the country. The scholarships awards will commence from 2012.
- ▶ The company is supporting Balochistan Public School (BPS) since the mid-2000. BPS provides quality secondary education to local boys from grade VII to XII through a residential facility, latest teaching and learning resources and qualified teachers. Initially, PPL provided about Rs. 6 million for renovation of the school building and provision of books and uniforms for students. Later, Rs.14.108 million was provided for construction of hostel and messing facility. In 2009, PPL Board of Directors approved 12 annual scholarships for 6 years for deserving students from District Dera Bugti to study at BPS. During 2011, the third tranche of scholarships was provided to BPS students bringing the total number of beneficiaries to 36.
- ▶ PPL regularly provides furniture, stationary and other relevant items/ equipment to schools near its operational areas to support their curricular and co-curricular activities. To this end, the company provided furniture to Inter College Dera Bugti and Mai Maryam Girls High School, District Sanghar worth Rs. 1.416 million
- ▶ The company regularly supports its adopted government schools in Ghabi Dero and Ghazi Khan Chandio, near Mazarani Gas Field.
- ▶ PPL provided 100 Frequency Modular (FM) Systems to the Institute for Special Children (ISC), Quetta over a period of five

years from 2007 to 2011. FM is a state-of-the-art hearing instrument that directly transmits the teacher's voice to students, regardless of distance, and reduces grey noise to make audibility clear. During 2011, PPL completed the delivery through the last tranche of 20 to ISC.

- ▶ PPL has constructed three primary schools in Kandhkot, near its operational field. These schools are run by The Citizen's Foundation (TCF). As part of the MOU signed between the two organizations, TCF will ensure provision of quality education to children from the local communities while PPL will provide the cost for operation, construction and other expenses besides monitoring and feedback on progress made by TCF. The company has created an endowment fund worth Rs. 78 million for construction and operationalization of these schools over a period of 10 years. These schools have started operations during 2011 with an encouraging enrolment of over 400 students.
- ▶ To promote education, especially in remote areas, PPL has given generous donations to the following institutions, including:

Institutions/ Initiatives	Spending in 2011-2012 (March) (Rs. in millions)
NED University of Engineering & Technology, Karachi for establishing Petroleum Faculty	0.142
The Garage School, offering educational opportunities to children of disadvantaged communities in Karachi	0.8
Uniforms and shoes for students of Ghaibi Dero School	0.783
Construction of a PPL-block at Chemical Engineering Department, University Karachi	2.75
Books for Sardar Ali Sabri Memorial Society, Karachi	0.16
Fees for girl students moved from FG Public School to TFGS	0.564
Construction of two classrooms at Government Boys High School, Kani Tehsil and District Attock	0.358
Balochistan Institute of Technical Education for Endowment Fund	25
Construction of Lieutenant Saifullah (Shaheed) FC Public School & College, Nushki	1.50
Operational cost for 30 literacy centres to National Commission for Human Development, Dera Bugti	0.375
Books for Sardar Ali Sabri Memorial Society, Karachi	0.160
Bahria University, Karachi	0.02
Establishment of computer lab and library at Jamia Masjid, Quetta	0.50





## Social Welfare

### Performance

PPL draws strength and direction from the government's policy of encouraging the corporate sector to extend a helping hand to people living in remote areas of the country. The company has formulated a diverse, need-based social welfare policy. Though concentrated around its locations, PPL's CSR initiatives are spread across the country. To ensure optimum on-ground implementation and impact, PPL works through government, local civil society institutions and communities.

- ▶ The company won the Pakistan Corporate Philanthropy Awards instituted by the Pakistan Centre for Philanthropy (PCP) for seven consecutive years from 2004 to 2010.
- ▶ To support organizations delivering social, healthcare and other services to the needy, PPL has given generous donations to the following:

Institutions/ Initiatives	Spending in 2011-2012 (March) (Rs. in millions)
PCP, Islamabad	3.4
Old Association of Kinnaird Society	0.2
Providence Home for Golden Jubilee celebrations	0.01
St. Patrick's Cathedral for Fundraising Cricket Tournament	0.015
Society of Petroleum Engineers - Pakistan Association of Petroleum Geoscientists Annual Technical Conference 2012	1.2
World Wide Fund for Nature (WWF), Pakistan for Earth Hour 2011 and 2012	0.2
Conference by Management Association of Pakistan	0.25
Special Olympics C/o RMC Resource Marketing for Musical Night	0.2
SADA Welfare Foundation for distribution of ration	0.05
Pakistan Hockey Federation	0.10
National Forum for Environment and Health	0.2

## Healthcare Initiatives

### Performance

PPL cares for local communities wherever it operates. The company has provided extensive medical facilities in some of the most remote regions of Pakistan through building hospitals, rural health and mother and childcare centres, mobile dispensaries and medical camps.

- ▶ PPL runs a fully equipped Sui Field Hospital (SFH) at Sui Gas Field since the early 1960s. The hospital provides free-of-cost medical facilities to a large number of local patients, in addition to PPL field staff.
- ▶ A fully equipped mobile medical dispensary (MMD) takes a weekly round of more than 12 villages around Sui Gas Field to provide healthcare facility, including treatment of common diseases, X-Rays and minor procedures, to locals residing in the area. The dispensary refers cases for further investigation and treatment to SFH. Despite these efforts, a large number of patients in Sui could not be reached. For this, PPL in partnership with Government of Balochistan (GoB) is constructing a 50-bed PPL Public Welfare Hospital in Sui Town. The land is provided by GoB while PPL is committed to invest Rs. 243 million for construction and furnishing the hospital together with providing basic equipment, medicines and hiring of 10 consultants. The hospital will be run by GoB and have the necessary facilities such as gynaecology and obstetrics, emergency and operation theatres. The hospital will be completed by end-2012. Additionally, PPL provides free medicines to Rural Health Centre (RHC), Sui on a monthly basis. Recently, PPL carried out renovation of RHC at a cost of Rs. 0.036 million.
- ▶ The company operates MMDs for local communities living around Mazarani and Kandhkot Gas fields.



- ▶ PPL holds bi-annual free-of-cost eye camps for treatment of ophthalmic diseases around its operational areas in Sui, Adhi, Kandhkot, Mazarani, Chachar and Hala fields. Cataract surgeries are also performed at the eye camps. Besides, the company also holds free-of-cost medical camps for critical epidemic/ contagious diseases such as scabies around its producing assets. These camps draw a large number of people who benefit from the facilities.
- ▶ PPL has adopted Marie Adelaide Leprosy Centre's Triple Merger programme at Turbat and Panjgur, Balochistan and Kandhkot, Sindh for over four years. These centres extend free-of-cost diagnosis and treatment for leprosy, blindness and tuberculosis to local communities.
- ▶ During 2011, the company supported a major initiative by Murshid Hospital and Healthcare Centre for training traditional birth attendants (TBAs) in safe delivery practices, especially around company's production assets with a dedicated budget of Rs 1 million. To this end, initially a capacity building programme was conducted for local midwives to work as master trainers by certified practising midwives trained by the practitioners at Royal College of Obstetricians and Gynaecologists, United Kingdom. These master trainers in turn held training sessions for TBAs residing in remote areas, including PPL's operational fields in Adhi, Kandhkot and Mazarani during April and May 2011. TBAs were selected through training needs assessment by PPL staff. A refresher course was also organized for trained TBAs in Adhi and Kandhkot fields during October 2011 to assess implementation, address issues/ lessons learned and fill-in gaps.
- ▶ To support viable community health projects and services, PPL has given generous donations to various institutions, including the following:

Institutions/ Initiatives	Spending in 2011-2012 (March) (Rs. in millions)
National Institute of Cardiovascular Diseases, Karachi	5
Sindh Institute of Urology and Transplantation, Karachi	5
Dialysis of 20 patients at Zubeida Medical Centre	2.10
The Kidney Centre	3.05
Pakistan Association of Mental Health	0.085
Karwan-e-Hayat, Karachi (on an annual basis since 2002)	3.90
Patient Welfare Society, Aga Khan University	0.060
Pink Ribbon, Pakistan	0.75
Video laparoscope for Nighaban Welfare Association and Endoscopic Retrograde Cholangio Pancreatography machine for Civil Hospital, Karachi	3
Koohi Goth Hospital	0.05
Pakistan Association of Blind	0.096
Make A Wish Foundation for purchase of vehicle	0.80
Sindh Welfare Association of the Deaf	0.02
Jinnah Postgraduate Medical College for construction of tuberculosis ward	5
Dar-ul-Sukoon for fund raising gala	0.15
Pakistan Psychological Association	0.1
Poor Patients Aid Society, Civil Hospital	0.20

## Enhancing Livelihood Opportunities

### Performance

**PPL realizes that changing the fate of marginalized communities is better addressed through creating livelihood options on a sustainable basis. The company has invested substantially in engaging people, both men and women, in earning livelihoods through sustained sources of income.**

- ▶ The company has been supporting operational costs of Women Handicraft and Welfare Centre (WHWC) at Sui since 2006. The centre, currently run by Pakistan Army in the FG Public School's premises, provides skill learning opportunities for young local women who could not complete their formal education and are interested in enhancing their income potential. A purpose-built facility is nearing completion within the TFGS premises, run by a renowned civil society organization Taaleem Foundation (TF) working in Balochistan. On completion, TF will take over the operations of WHWC. PPL will also furnish the facility and provide relevant equipment and material. The centre will host a day-care facility for participant mothers to look after their children while they attend classes.
- ▶ PPL is extending infrastructure and maintenance support for Technical Training Centres (TTCs) in Sui and Daultala, near Adhi Field, since the 1990s. The courses offered at these centres include automobile, electronics, carpentry, welding and plumbing. Besides, PPL is supporting 15 top graduating students of TTC-Sui to pursue diploma level studies in recognized polytechnics across the country through provision of scholarships on an annual basis. To date 35 students have benefitted from the scholarship programme since 2009.



- ▶ PPL initiated a 12- week training scheme for Heavy Transport Vehicle drivers at National Logistics Cell Driving School Dina, Jhelum. Under this programme 100 participants, living around PPL's operational areas, will receive an internationally recognized HTV driving certificate on completion of the course. So far, 67 drivers have received HTV training through three batches.
- ▶ After receiving an overwhelming response from WHWC Sui and results of the need analysis survey carried out by PPL staff in Adhi, a Women Vocational Training Centre (WVTC) was established by PPL in Mastala near Adhi Field to facilitate women who want to increase their income potential through learning new skills. Inaugurated in 2011, the centre is run by Help in Need, a non-governmental organization, who is working as an implementing partner. PPL constructed, furnished and provided resource material together with operational cost for WVTC with an investment of 4.6 million rupees. The centre focuses on training women in tailoring, embroidery and cooking. Besides, WVTC also runs a basic literacy programme for participants. A play area with a trained baby sitter is also available within WVTC's premises to provide childcare support to participating mothers. Currently, about 80 women from surrounding communities are enrolled at WVTC.

## Infrastructure Development

### Performance

**PPL recognizes that provision of meaningful, durable infrastructure is a key to development and sustained economic growth, especially in the far-flung areas of the country. The company's business takes it to the remotest and usually the disadvantaged areas of the country, where it has focussed on developing infrastructure and civic amenities, including roads, bridges, culverts, water supplies and construction of basic facilities, not only for its own use but also for local communities.**

- ▶ PPL provides free-of-cost gas and water supplies to Sui Town and villages around Sui Gas Field. More than 2 million gallons of drinking water is supplied daily to about 40000 residents in Sui Town, through Kashmore Pumping Station situated 55 kilometers away from the town, at an annual cost of Rs. 100 million. Due to line losses and pilferages on the supply line, the residents' needs were not fully meet. To address this issue, PPL in partnership with GoB is developing a new water supply system for Sui Town. With a contribution of Rs. 85 million, the company will fund the construction of trunk lines, overhead tanks, pump houses, pumping machinery, repair of existing tanks and providing independent electrification system for operating the pumping station.
- ▶ To provide free-of-cost potable water to Ghabi Dero (GD) and its surrounding villages near Mazarani Gas Field, PPL has initiated a water supply scheme using a bowzer facility. The water is provided through a safe source as there is a high incidence of water reservoir turning polluted/unfit for drinking. The water is stored in two tanks built in GD



village. The company provides about Rs. 1.5 million annually for maintenance, supply and salaries.

- ▶ Haibat Bridge near Kandhkot Gas Field was renovated by PPL in 2005. Due to the bridge's deteriorating state, it was decided to construct a new and wider bridge over the BS Feeder canal adjacent to the old Haibat Bridge. For this, a 100-meter long new bridge was designed and constructed by PPL, which was completed in December 2011 with an investment of Rs. 69 million. The new bridge provides the shortest route for locals residing near the right bank of the Indus River to the Indus Highway and main Kandhkot city, a commercial hub and district headquarter, encouraging socio-economic growth.
- ▶ In 2005, PPL constructed a 17-kilometer long road from Mazarani Gas Field to Ali Hyder Mirjat Mile village, passing through GD, to facilitate company staff and local communities in District Kamber-Shahdadt. PPL maintains the road. As part of the calamity hit area during 2010 Floods, the road was damaged and became inaccessible. The company repaired and re-opened the road in a record time of one week.
- ▶ Given the tribal disputes and lack of infrastructure facilities in Kandhkot, the law and order situation remained poor. On the request of District Police Department, PPL constructed a Police Complaint and Quick Response Centre in Kandhkot with an investment of Rs. 0.161 million.

Institutions/ Initiatives	Spending in 2011-2012
	(March) (Rs. in millions)
Community Water supply scheme at Shoran, Dhadar, Balochistan	17.467
Construction of Access Road to Mastala near Adhi	0.499
Construction of Shiree Jinnah Terminal, Karachi	3

## Post-disaster Relief

### Performance

**In times of national emergencies, PPL has always come forward to give generous donations in cash and kind to victims of disaster-hit areas. Following the 2005 earthquake, the company moved a step forward by assisting rehabilitation efforts so that affectees can once again become productive members of society. Likewise, for the devastating floods in 2010 and 2011, PPL not only provided generous donations for victims but it is also working on a strategy for their long-term rehabilitation in partnership with local civil society organization.**

- ▶ PPL established and operationalized a Rehabilitation Centre in Bagh in 2006 for the October 8, 2005 earthquake victims, needing prostheses and orthoses treatment. The centre is managed by Chal Foundation and extends physiotherapy and counselling services for physical and psychological management of the disability besides provision of limbs to affectees. Since 2010, PPL has created an endowment fund worth Rs. 24 million to support the centre's operational cost for another three years.
- ▶ PPL extended generous support for flood affectees of July 2010. The company donated Rs. 20 million in cash to the Prime Minister's Flood Relief Fund 2010 (PMFRF). PPL staff and workers also contributed one day's salary amounting to Rs. 6.3 million to PMFRF. Besides, PPL also distributed relief goods, including dry food packages, tents and other basic necessities amounting to Rs. 30 million, to affected areas. To provide healthcare facility to flood affectees around its operational fields, PPL set up medical camps in collaboration with local rural healthcare centre. The camps facilitated over 6000 patients through on-spot diagnostics, oral





and clinical administration of medicines and provision of free medical supplies worth Rs 2.7 million. PPL has also earmarked Rs. 50 million for rehabilitation work near Kandhkot Gas Field in partnership with a civil society organization.

- ▶ PPL Board approved Rs. 35 million for flood affectees in 2011. Of this, Rs. 20 million was provided to PMFRF and the remaining amount was used for distributing relief goods among flood victims. Two consignments containing 8500 food boxes and 1100 tents were sent to flood affectees near PPL's Hala Field as well in districts Badin, Thatta, Dadu and Tando Mohammad Khan. Besides, 300 food packets and 50 tents were provided for affectees in District Nasirabad, Balochistan. Moreover, 11 free medical camps were organized in District Sanghar, near PPL's Hala Field benefitting about 6000 flood victims.

The assistance provided to flood victims was through a need assessment process in consultation with relevant local authorities and area notables.

Institutions/ Initiatives	Spending in 2011-2012
	(March) (Rs. in millions)
Flood Relief Fund through Overseas Investors Chamber of Commerce and Industry	0.2
Flood Relief Fund, Karachi	0.130

# Principle 2



Business should ensure that they are not complicit in human rights abuses.



## COMMITMENT

PPL is highly committed to conducting its business in accordance with the highest ethical and legal standards.



## 1 ETHICS

### ACTIONS

#### Adherence to Highest Corporate Values

##### Performance

**PPL's vision, mission and values are testament to the importance the company places on corporate ethics. As such, the company expects its employees to adhere to the following core values:**

- ▶ Recognizing that leadership, empowerment and accountability are essential for corporate success
- ▶ Pursuing the highest standards of ethical behaviour and integrity
- ▶ Considering people as the most important resource
- ▶ Valuing creativity and innovation
- ▶ Committing to excellence in all spheres of performance
- ▶ Advocating team spirit and work
- ▶ Respecting environmental imperatives and striving for its conservation

#### Code of Business Ethics

##### Performance

**Ethical commitments and values remain the centrepiece of PPL's code of conduct, compliance to which is mandatory for all employees.**

- ▶ All employees sign and submit annual compliance certificates to ensure clear understanding and acceptance and uphold PPL's Code of Business Ethics.
- ▶ PPL requires its employees to maintain an environment free from prejudice, harassment and disruptive activities.

- ▶ In compliance with Oil & Gas Regulatory Authority's directives to implement 'Protection Against Harassment of Women at Workplace (PAHWW) Act 2010', the company took the following measures:
  - Circulated brochures on salient features of the Act, including instructions on compliance, to all employees.
  - Company's harassment policy was prominently placed on the PPL website and portal.
  - A three-member committee, including a female staff, was constituted to address staff grievances.
  - Awareness sessions for staff were organized on PAHWW Act 2010 and PPL's harassment policy at head office and Sui Gas Field.
- ▶ Any suspected violations or actions that create hostile or offensive work environment such as sexual harassment or insensitive comments concerning gender, religion, race, disability or age are promptly reported to management that ensures appropriate actions in line with Standard Operating Procedures.
- ▶ Violations of the Code of Business Ethics are viewed seriously and have often resulted in disciplinary action and, in some cases, led to termination of service.

# Principle 3



Business should uphold the freedom of association and the effective recognition of the right to collective bargaining.



## COMMITMENT

We acknowledge and respect rights to freedom of association and collective bargaining. We are committed to addressing issues, problems and grievances proactively to regulate the company's operations with dignity of labour, minimization of animosity and fostering a relationship of trust between management and workers.





## 1 Industrial Relations

### ACTIONS

#### Freedom Of Association

##### Performance

**The company believes in the freedom of opinion and expression of all stakeholders and seeks to ensure a congenial and equitable working environment as per law:**

- ▶ The company complies with the Industrial Relations Act, wherein employees are free to join any trade union of their choice.
- ▶ PPL has a registered trade union, Pakistan Petroleum Workers Union, of which most workers are members.

#### Collective Bargaining

##### Performance

**The company management and Collective Bargaining Agent (CBA) work towards creating a cordial working environment for workers at all field locations.**

- ▶ The CBA together with stewards and union members, coordinates with management to improve working conditions and redress job-related issues.
- ▶ Negotiations of the Charter of Demands are always settled amicably with CBA representatives.
- ▶ Initiatives for change are undertaken by incorporating the union's suggestions to ensure hassle-free implementation.

- ▶ The office bearers of the trade union enjoy freedom to discharge their legal responsibilities without any interference from management.
- ▶ All terms and conditions of employment of workers are reviewed bi-annually and discussed in a friendly environment with CBA. After bilateral negotiations, a handsome increase in wages and other allowances are paid to them through settlement.
- ▶ Policies on salaries and allowances as well as other benefits such as medical, leave and travel are duly discussed and finalized with the CBA every two years.
- ▶ The Collective Bargaining agreement is concluded through bilateral negotiations.
- ▶ The company has not witnessed any strike, legal or illegal, or lockout during the last five years.
- ▶ No cases of unfair labour practices have been filed by the union.
- ▶ The company provides special leave to CBA union/employees for appearance in court cases, if it is party to disputes.





## Principle 4

Business should support the elimination of all forms of forced and compulsory labour.



## Principle 5

Business should support the effective abolition of child labour.



## COMMITMENT

PPL supports abolition of child labour and elimination of all forms of forced and compulsory labour in its areas of operations or by any of its business partners and contractors.



## 1 Employees

### ACTIONS

#### Procedure for Preventing Under-age Employment

##### Performance

**The company strictly forbids child labour and actively prevents hiring under-age workers.**

- ▶ All PPL permanent workers are in the adult person (18 years and above) category, in accordance with the law.
- ▶ To prevent under-age hiring, the ages of all workers are confirmed through national identity cards, birth certificates, educational certificates or Form 'B' issued by the National Database and Registration Authority.

#### Procedure for Preventing Forced Labour

##### Performance

**The company follows strict procedures to prevent forced labour.**

- ▶ Employment agreement clearly states terms and conditions of service, voluntary nature of employment, freedom to leave and any conditions associated with departure or cessation of work.
- ▶ Employment agreements do not violate any human rights or labour laws.
- ▶ Either party can terminate employment contracts within the notice period.

- ▶ Exit notice period for workers is 30 days and for management, professional and technical staff is 90 days.
- ▶ Exit interviews are taken to solicit feedback and institute corrective measures, if necessary.

#### Record of Checking Minimum Wage Rate Against Regulated Amount

##### Performance

**The company keeps its wage policy in line with governmental directives to ensure fair corporate governance.**

- ▶ All workers in the company (both permanent and contract) are employed above the minimum wage rate as specified by the government and paid competitively in accordance with market norms.

# Principle 6



Business should support the elimination of discrimination in respect of employment and occupation.



## COMMITMENT

PPL is committed to providing equal opportunities for employment as well as growth opportunities without any discrimination on the basis of race, sex, religion, language, social origin, birth or other status.





## 1 Recruitment

### ACTION

#### Equal Employment Opportunity

##### Performance

**PPL's employment policy provides equal opportunities for employment and discourages all forms of employee discrimination.**

- ▶ PPL is an equal opportunity employer and provides equal opportunity to women employees.
- ▶ Women employees are placed at various levels in the organization, ranging from non-management to senior management positions.
- ▶ The company employs men and women employees under standard screening processes based on merit and job suitability.
- ▶ There are equitable career paths and opportunities for women employees.
- ▶ To further emphasize the equitable role of working women and address their issues at work place, the company marks the International Women's Day and International Working Women's Day. Dedicated sessions are organized for women employees to increase awareness about their role and responsibilities and address their issues.

## 2 Employees

### ACTIONS

#### Enabling working conditions for diversified workforce

##### Performance

**As a leading employer and responsible corporate citizen, PPL provides an enabling environment for professional growth, with equity, security and human dignity, irrespective of gender or religion.**

- ▶ PPL has a diversified workforce and does not discriminate on the basis of race, colour, gender, religion, disability or family status in the recruitment, training or advancement of its employees.
- ▶ Minorities are given special holidays in accordance with their religious festivals to ensure an open and moderate culture and environment across the company.

#### Career Plan: No Discrimination in Staff Promotions

##### Performance

- ▶ Hiring and promotions are done on merit, professional performance and qualification. The company has also put in place a uniform recruitment and promotion policy issued by the Ministry of Petroleum and Natural Resources in 2011.

# Principle 7



Business should support a precautionary approach to environmental challenges



## COMMITMENT

PPL is committed to environmental conservation by complying with National Environmental Quality Standards (NEQS).



## 1 Environment Management

### ACTIONS

#### Health, Safety and Environment

##### Performance

- ▶ PPL's HSE Policy recognizes its management's commitment to the health and safety of its employees, contractors and visitors and ensuring environmental conservation during the company's operations. The policy is displayed at prominent locations at the head, regional and field offices and can be accessed through the company's website:  
<http://www.ppl.com.pk/>
- ▶ The company has a well-defined HSE Management System developed in line with internationally recognized ISO 14001 Environment Management System (EMS) and Occupational Health and Safety Assessment Series (OHSAS) 18001. The system provides a continuous assessment and monitoring process against standard parameters to ensure the highest level of safety and minimal damage to the surrounding natural environment.
- ▶ The HSE Executive Committees at field level monitor HSE activities at regular intervals and hold quarterly meetings to review results of internal and external audits, carry out key investigation and review progress and performance against set objectives. Moreover, a Central HSE Executive Committee at the head office chaired by the Managing Director meets every quarter to discuss company-wide HSE issues and takes decisions vis-à-vis organizational policy. The committee also monitors the progress on implementation of decisions.

#### Environmental Studies

##### Performance

- ▶ Initial Environment Examination (IEE) and Environment Impact Assessment (EIA) studies are consistently undertaken for all development initiatives, including drilling and seismic operations and projects, in compliance with the Pakistan Environmental Protection Act, 1997. IEE/ EIA aim to identify potential environmental impacts at development sites and advise mitigation measures accordingly. These studies are submitted to relevant provincial Environmental Protection Agencies (EPA) for approvals. Once approved, IEE/ EIA provide a benchmark for regular internal and external monitoring against suggested mitigation measures.
- ▶ Independent monitoring is organized for seismic and drilling operations in environmentally sensitive areas through specialized consultants to ensure that the methodologies used in carrying out the survey and mitigation measures

adequately address the environmental issues of these areas, while meeting legal requirements, company's HSE standards and stakeholders' expectations.

- ▶ Monthly environmental monitoring is carried out through an external laboratory for compliance with local regulatory requirements. Environmental reports are communicated to concerned EPAs through the Self Monitoring and Reporting Tool (SMART) programme.

#### Environmental Aspect Impact Analysis

##### Performance

- ▶ The company has devised Environmental Aspect Impact Analysis (EAIA) procedure for small to medium operations at its fields/ exploration blocks in line with the international EMS and OHSAS standards. EAIA helps in proactively identifying, evaluating potential environmental hazards and taking appropriate precautionary control measures to mitigate impacts.

#### Precautionary Measures

##### Performance

- ▶ Noise monitoring and abatement is ensured for safe working environment in high noise areas. For this, enclosures and sound barriers are provided, as appropriate.
- ▶ To control accidental leakage, adequate control arrangements such as barriers and spill control kits are available at all operational areas. Besides, designated teams are trained to handle incidental spills.

# Principle 8



Business should undertake initiatives to promote greater environmental responsibility



## COMMITMENT

PPL is committed to raising environmental awareness within the company, suppliers and dealers through encouragement of eco-friendly practices.





## 1 Awareness Raising

### ACTION

#### Enhancing Environmental Awareness

##### Performance

- ▶ Awareness raising sessions and trainings with special focus on environment and sustainable development are regularly held to apprise staff on key environmental issues, their causes and solutions at various levels, including individual, organizational and national. In addition, HSE safety talks and bulletin boards are effectively utilized to promote awareness on environmental conservation.
- ▶ PPL offices and fields have been declared 'No Smoking Zones' and separate smoking areas are designated for smokers. The non-smoking policy is displayed in all departments and locations.
- ▶ PPL is an active corporate member of the Pakistan chapter of World Business Council for Sustainable Development. The company works with other corporate partners to bring together organizations in Pakistan to adopt business practices based on sustainable development principles.
- ▶ PPL is a corporate member of leading environmental organizations, including WWF, and participates in various events and campaigns organized by them. PPL was a sponsor for the Earth Hour (EH) 2011 and 2012 organized by WWF. All company locations observed EH with unnecessary lights switched off during the given hour.

## 2 Environmental Responsibility

### ACTIONS

#### Setting up Environment-friendly Models

##### Performance

**PPL ensures proactive acceptance of responsibility and accountability for environmental imperatives. The company recognizes conservation as a key component of operational excellence and actively incorporates industry best practices in its overall operations. The company's latest plants and facilities are designed according to the best environmental standards. Besides, the existing facilities are being upgraded to conserve the environment.**

- ▶ The company-operated latest producing asset, Hala Early Production Facility, inaugurated in February 2010, is designed in line with environmental imperatives. Some of the key features include:
  - Chlorofluorocarbon (CFC) - free natural gas refrigeration system in compliance with the Montreal Protocol to address ozone depletion and global warming. Propane is used instead of CFC.
  - Containment of water (produced during operations) in properly lined evaporation ponds, ensuring zero land discharge and preventing soil and ground water contamination.
  - Procurement of material according to the NEQS such as generator sets and asbestos-free material, including fire suits and storage sheds.





- Minimal flaring and venting of sales gas during commissioning phase.
- NEQS compliant equipments are also procured at Kandhkot Field Gas Compressor Station commissioned in 2010.
- ▶ 'PPL House' construction project was designed according to leading green built-design practices. For this, extensive consultations were held with renowned green building consultants to incorporate Leadership in Energy and Environmental Design (LEED) protocol.
- ▶ Energy conservation programme was initiated during 2011 at PPL-operated fields to record and develop inventories for electricity, gas, other fuels and water use for collecting baseline information. The baseline enabled the HSE Department and relevant field staff to develop energy conservation plan for each field. The plan will be used to monitor and implement energy conservation programme during 2012.

## Eco-friendly Practices

### Performance

**PPL is gradually moving towards eco-friendly practices to minimize damage to natural resources through its regular operations to support company's commitment towards sustainability:**

- ▶ Tree cutting/ logging is avoided during seismic operations while site restoration is simultaneously carried out, even for a small vegetation patch.
- ▶ Tree plantation campaigns are undertaken at all PPL-operated production and exploration assets to off-set emissions and improve ambience.
- ▶ For drilling operations, water-based mud, which is known for compatibility with natural soil, is preferred over oil-based mud, which requires special treatment for disposal.
- ▶ Use of biodegradable explosives in exploration activities.
- ▶ Promoting electronic communication for official purpose together with duplex printing to reduce paper usage.
- ▶ Conventional lighting fixtures have been replaced with energy efficient structure at head office to further energy conservation.

## Evaluation of HSE Performance

### Performance

- ▶ The HSE Executive Committees, comprising field management at field-level and senior management from head office as part of the Central Executive Committee, regularly evaluates activities at various company locations, provides feedback and monitors compliance.
- ▶ Internal audits of departments/ fields are carried out in line with the annual HSE audit plan to assess implementation of HSE Management System and performance. In addition, external audits are also carried out to verify compliance to ISO 14001 EMS and OHSAS 18001 certifications. HSE inspections, spot checks and suggestion forms are utilized with participation of all staff in accordance with the guidelines provided in the HSE Management System for eliminating hazards.
- ▶ As a result, 13 company fields and facilities are certified for ISO 14001 EMS and OHSAS 18001. These include Kandhkot, Adhi, Mazarani and Chachar fields, Sui Field Gas Compressor Station, Sui Production and Sui Field Engineering, Sui Stores and Sui Hospital together with Drilling Operations, Design and Construction, HSE and Projects departments. Certification for remaining facilities is underway for ensuring continual improvement.

# Principle 9



Business should encourage the development and diffusion of environmentally friendly technologies.



## COMMITMENT

PPL is committed to environment-friendly technology to reduce its carbon footprint.



## 1 Environment-friendly Technologies

### ACTION

### Waste Management and Emission Control

#### Performance

**The company seeks to minimize adverse environmental impact of its operations through the use of innovative technology.**

- ▶ The company has a well-defined waste disposal and management process in place that follows the corporate HSE Standard Operating Procedures, including waste segregation at source, waste minimization strategy, preference to recycling and reuse, safe handling and disposal of hazardous waste as per good practices such as landfill, composting and incineration.
- ▶ All company-operated fields are registered with the Federal EPA under SMART programme for monthly testing through external laboratory and reporting of emission against NEQS parameters.

- ▶ PPL encourages use of environmental-friendly equipment, especially for its new facilities. Emissions from company equipment, at fields, is also monitored and controlled through in-house maintenance programme and end of pipeline solutions. A defined system for monitoring, root cause analysis of excursions in emission test results and subsequent remedial actions is in place for NEQS compliance.
- ▶ Optimum measures are undertaken to process waste water to avoid further pollution. Usually, effluent water is contained in ponds lined with pit line for evaporation. Alternatively, waste water evaporator is installed to reduce contamination of underground water through seepage of effluents carrying salt and oil droplets in the shape of emulsion.



# Principle 10



Businesses should work against all forms of corruption, including extortion and bribery.



## COMMITMENT

PPL is committed to eliminating corruption through implementation of ethical codes and policies that govern business operations and relationships with external stakeholders.





## 1 Employees

### ACTIONS

#### Code of Ethics

##### Performance

**The company has zero-tolerance for all forms of corruption, including bribery and extortion.**

- ▶ All employees are required to sign the Code of Business Ethics at the time of joining and submit compliance every year.
- ▶ All employees are forbidden to give or receive any bribes or other payments intended to influence business decision or compromise fair judgment.
- ▶ No employee can give money to obtain business for the company or receive money for giving company business to an external agency.
- ▶ All employees are forbidden to accept gifts from suppliers, contractors, dealers or competitors, who have or wish to have a business relationship with the company.
- ▶ Rumour mongering and gossiping is strictly prohibited.
- ▶ All employees are required to declare their assets on a yearly basis.

#### Corporate Governance

##### Performance

- ▶ PPL promotes fair business practices and ensures compliance with regulatory and legal requirements.
- ▶ The company uses internationally acceptable accounting standards to maintain transparency.
- ▶ All funds, assets, receipts and disbursements are properly recorded in the books of the company.
- ▶ The company complies with regulations of the Securities and Exchange Commission of Pakistan.
- ▶ Signed statement of compliance is included in the company's annual reports.
- ▶ No incident of corruption has been reported in the company.
- ▶ All business units were analyzed for risks related to corruption.
- ▶ Regular checks by Internal Audit Department are carried out for all departments to ensure compliance with company procedures and ensure course correction, if required.
- ▶ In recognition of its management practices and extensive social contributions, PPL was adjudged the winner of the 25<sup>th</sup>, 26<sup>th</sup>, 27<sup>th</sup> and 28<sup>th</sup> Corporate Excellence Awards in the Fuel and Energy Sector. This award was conferred by MAP. PPL's exemplary performance was accredited by MAP, following a detailed review not only of the company's management systems and policies and procedures but the efficacy of their implementation.

## 2 External Interface

### ACTION

#### Credible Disclosure of Information to Investors and Stakeholders

##### Performance

- ▶ PPL ensures transparency in business transactions and rejects any business practice which may be deemed improper.
- ▶ All financial reports are properly audited by external auditors.
- ▶ PPL's Annual Report 2010 was chosen as the best report among the five selected companies from the Fuel and Energy sector. The annual report also received the Best Presented Accounts Award by the South Asian Federation of Accountants in 2011.
- ▶ Quarterly briefing on financial statements is given to management.
- ▶ Meeting of PPL's Board of Directors is held on a quarterly basis.
- ▶ Media/press briefings and interviews are given on demand.
- ▶ Consultative meetings with CSR partners are held for social development initiatives.
- ▶ The company ensures timely payment of taxes.
- ▶ Checks such as annual declaration of assets, notifying the company in case of receipt of gifts above a certain value, hospitality and potential conflicts of interest are in-built into the system to preempt corruption.
- ▶ Similar checks and balances are built into organizational processes, governing procurement, materials and personnel in accordance with the Manual on Delegation of Authority and Public Procurement Regulatory Authority, a public sector entity to monitor procurement in a transparent manner.





## **Pakistan Petroleum Limited**

4<sup>th</sup> Floor, PIDC House  
Dr. Ziauddin Ahmed Road  
P. O. Box 3942, Karachi-75530  
UAN: +92-21-111-568-568  
Tel. Nos: +92-21-35651480-89  
Fax Nos: +92-21-35680005 & 35682125  
Email: [info@ppl.com.pk](mailto:info@ppl.com.pk)  
Website: [www.ppl.com.pk](http://www.ppl.com.pk)