



# **SUSTAINABLE DEVELOPMENT REPORT & UNGC COMMUNICATION ON PROGRESS 2017**





# SUSTAINABLE DEVELOPMENT REPORT

2017



*This document draws on relevant sections of the company's latest edition of Business Principles, Our Code of Conduct and Facts and Figures on NLNG 2018, as published on the company website,  
<http://www.nigerialng.com>*



# SUSTAINABLE DEVELOPMENT REPORT

2017

## SUSTAINABLE DEVELOPMENT REPORT

This publication is produced by the Corporate Communication and Public Affairs Department of Nigeria LNG Limited.

More information on the company's operations can be found at [www.nigerialng.com](http://www.nigerialng.com) or [www.nlng.com](http://www.nlng.com).

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2017

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Images from NLNG's Bonny Plant Complex





LNG Abuja II

## BACKGROUND

In December 2015, Nigeria LNG Limited (NLNG) became a signatory to United Nations Global Compact (UNGC), the world's largest voluntary corporate responsibility initiative with business and non-business participants from 160 countries.

The UNGC supports companies to:

- Do business responsibly by aligning their strategies and operations with the UNGC's Ten Principles anchored on four global areas of human rights, labour, environment and anti-corruption.
- Take strategic actions to advance broader societal goals, such as the UN Sustainable Development Goals, with an emphasis on collaboration and innovation.

Our UNGC membership is a public declaration of our continued commitment to incorporating environmental, social and governance standards in our strategies, policies and procedures, as well as embedding a culture of integrity, all of which are underscored in our Statement of Business Principles and Our Code of Conduct.

Through our UNGC membership and the annual Communication on Progress (COP), we will transparently inform the public on how we continue to align our practices with the universal principles of responsible behaviour through support to host communities as well as engage customers, suppliers and service providers on the need for responsible business practices.

Contents of this report can be verified in our published *Facts and Figures on NLNG 2017*, Anti-Bribery and Corruption (ABC) Policy, Statement of Business Principles, and Code of Conduct.





Administration Building, NLNG Bonny Plant Complex



## NLNG: PROFILE

Nigeria LNG Limited (NLNG) was incorporated as a limited liability company on May 17, 1989 to harness Nigeria's vast natural gas resources and produce Liquefied Natural Gas (LNG) and Natural Gas Liquids (NGLs) for export.

It is owned by four shareholders, namely, the Federal Government of Nigeria, represented by Nigerian National Petroleum Corporation (49%), Shell Gas B.V. (25.6%), Total Gas Electricite Holdings France (15%) and Eni (10.4%). The company has two subsidiaries: Bonny Gas Transport (BGT) Limited and NLNG Ship Management Limited (NSML).

### **Our Vision**

... A global LNG company helping to build a better Nigeria.

Nigeria LNG Limited will continue to be a global LNG company

renowned for its operational excellence, cost leadership, high HSE standards, honesty and integrity. We help to build a better Nigeria by processing, shipping and marketing efficiently and profitably, the country's gas resources and by putting out the flares, thus diversifying the economy and minimising the environmental impact of our activities and products.

We will set the standards in community relations and technology transfer, and actively promote the sustainable development of Nigerian businesses. We will provide to our shareholders a good return on their investment. We will provide an exciting and fulfilling place to work and the opportunity for staff to develop their potential.

Finally, we will execute and operate our business in Nigeria with an international outlook and mind-set.



NLNG signed HSE Leadership Charter with its contractors wherein both parties committed to zero incidents in company operations





NLNG Bonny Plant Complex at night

## HUMAN RIGHTS PRINCIPLES

### **Principle 1:**

Businesses should support and respect the protection of internationally proclaimed human rights; and

### **Principle 2:**

Make sure that they are not complicit in human rights abuses.

NLNG's human rights objectives and practices are in full alignment with UNGC principles on Human Rights. We strive to conduct our activities in a manner that respects the rights and dignity of all people. This is a business imperative for NLNG.



## ASSESSMENT, POLICY AND GOALS

NLNG's commitment to employees in our Statement of Business Principles and Ethics is "to respect the human rights of our employees and to provide them with good and safe working conditions, and competitive terms and conditions of employment."

Also, in Principle 5 (Human Rights) of the NLNG Code of Conduct, we commit to comply with applicable laws and regulations including the United Nations Universal Declaration of Human Rights and the core conventions of International Labour Organisation.

Human rights requirements are embedded in Our Code of Conduct manual and other policies, to make our position clear for all our customers, suppliers, employees and partners. They include:

Social Performance: all major projects must have a social

performance plan and address the social impacts of our operations on local communities.

Security: companywide security requirements help keep staff, contractors and facilities safe in a way that respects human rights, and the security of our host communities.

Contracting and Procurement: we seek to work with contractors and suppliers who contribute to sustainable development and are economically, environmentally and socially responsible.

### **Principles on harassment**

In furtherance of our support for Human Rights principles of the UNGC, NLNG has also committed to addressing issues of harassment in the workplace through Principle 4 of Our Code of Conduct policy by stating thus:

*“NLNG will not tolerate harassment. We will not tolerate any action, conduct or behaviour which is humiliating, intimidating or hostile. Treat others with respect and avoid situations that may be perceived as inappropriate. Feedback, criticism and challenge must always be delivered in an appropriate and respectful manner. In particular, be aware of cultural sensitivities - what is acceptable in one culture may not be in another. It is important to be aware of, and understand, these differences.”*

## **Complaints hotline and supporting resources**

Our commitment to human rights is further entrenched with the introduction of the Employee Assistance Programme (EAP) and the Ethics Line (Whistleblower) platform where parties come forward with complaints of abuses, unethical business practices, injustice and suspicious behaviours capable of compromising human rights standards in the organisation.





Staff members in a Stand-Down-for-Safety session





NLNG Deputy Managing Director, Sadeeq Mai-Bornu (middle), addressing participants at the 2018 NLNG Contractor CEO Safety Leadership Conference

## IMPLEMENTATION

We regularly engage with our external stakeholders and always strive to contribute, both directly and indirectly, to the general well-being of our host communities.

Principle 3.3 (Human Rights) of Our Code of Conduct document equally highlights the following expectation from all our stakeholders:

- You must ensure that your work complies with NLNG's commitments to human rights in Social Performance, Security, Human Resources and Contracting and Procurement.
- If you know of or suspect any potential human rights violations relating to our business, it is your duty to speak up.

Our social performance commitments are further entrenched by

our commitments to best practices in Principle 3.1 of Our Code of Conduct (HSSE and Social Performance).

Our Social Performance principles are specifically designed to ensure compliance with the law and to achieve continuous performance improvement, while promoting a culture in which all NLNG staff and contractors share this commitment.

In 2017, NLNG's focus on promoting Human Rights was further reiterated in (1) its review of the company's core values to understand the causes of fear in the organisation and (2) renewed commitment to set targets for HSSE&SP improvement, and measure, appraise and report performance levels towards achieving Goal Zero on all safety indicators.

Relying on existing NLNG HSSE&SP Control Framework that supports effective and efficient implementation of our policy, the



following commitments were extracted from our stakeholders:

- Comply with the law, standards and procedures
- Intervene in unsafe or non-compliant situations
- Respect our neighbours
- Compliance with the HSSE&SP policies and procedures
- Adherence to the 12 Life-Saving Rules
- Report and act on a HSSE&SP incident, potential incident or near-miss as soon as you become aware of it.

The Employee Assistance Programme (EAP) and Ethics Line platforms were sustained throughout 2017 and adequately supervised by experienced professionals within the Human Resources and Corporate Governance (GRC) business functions respectively, to further give impetus to the implementation plan.

This also included renewing the following expectations from all our stakeholders:

- You must treat others with respect
- You must not physically or verbally intimidate or humiliate others
- You must avoid situations that may be perceived as inappropriate
- You must not make inappropriate jokes or comments. If you are unsure whether something is inappropriate, assume that it is.
- You must not display offensive or disrespectful material
- Challenge someone if you find their behaviour hostile, intimidating, humiliating or disrespectful
- You may always contact your line manager, the GRC office or Human Resources



Production personnel in a tool box meeting



## MEASURES OF OUTCOMES

In 2017, NLNG made significant progress in promoting Human Rights in line with its earlier commitments and diligent implementation of the 2017 plans. In particular, the company recorded the following key outcomes in promoting Human Rights in the organisation and among its stakeholders:

### **Respect as a human right**

- Introduced and accentuated RESPECT as a critical element of our core values in NLNG in addition to the existing core values of Integrity, Teamwork, Excellence and Caring, and as part of the company's efforts to promote The Universal Declaration of Human Rights.

### **Campaign on harassment**

- The introduction of Respect as a core value in NLNG was

immediately followed up with a campaign focused on discussing the various dimensions of respect and what constitutes disrespectful behaviour in the organisation, including a survey on harassment, fear and other dimensions of respect in the organisation.

### **HSSE and Social Performance and Contracting/Procurement**

- In 2017, NLNG launched a campaign entitled "Reset the baseline and take back control on Safety" where the entire leadership team committed to reviving the safety journey. This led to over 200% increase, compared to 2016, in leadership involvement in safety and security - especially, Emergency Response.
- Intensified efforts on safety campaigns and awareness, reaching out to our contractors' personnel especially. In



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addition, the maiden Contractor CEO Safety Conference was organized, after which a follow-up workshop was held to build a solid partnership with our contractors on our safety leadership journey.

- Intensified the all-year-round HSE and Security campaigns in the last quarter of the year with the theme; "Safety in the Festive Season" aimed at keeping staff, contractors and facilities safe in a way that respects human rights and the security of our host communities.

Details of some of these activities can be found in our *Facts and Figures on NLNG 2017* and in relevant sections of our website, <http://www.nigerialng.com>



Some Plant personnel



Mechanical workshop staff in a Stop-For-Safety briefing



## LABOUR PRINCIPLES

**Principle 3:**

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

**Principle 5:**

The effective abolition of child labour

**Principle 4:**

The elimination of all forms of forced and compulsory labour

**Principle 6:**

The elimination of discrimination in respect of employment and occupation.

NLNG'S labour practices, evident in Our Code of Conduct and Business Principles, fully align with UNGC Labour principles.





Staff celebrating 2018 HSE Day

## ASSESSMENT, POLICY AND GOALS

Our commitment to employees in our Business Principles adequately supports the promotion of Principles 3 and 4 of the UNGC by providing for a system:

- To respect the human rights of our employees and to provide them with good and safe working conditions, and competitive terms and conditions of employment.
- To promote the development and best use of the talents of our employees; to create an inclusive work environment where every employee has an equal opportunity to develop his or her skills and talents.
- We recognise that commercial success depends on the full commitment of all employees.

- To encourage the involvement of employees in the planning and direction of their work; to provide them with channels to report concerns.

Equally, our Labour principles and practices on Equal Opportunity as clearly stated in Principle 3 of Our Code of Conduct are very well aligned with Principle 6 of the UNGC.

At NLNG, we offer equal opportunities to everyone. This helps us ensure that we always draw on the widest possible talent pool and attract the very best people. We rely on everyone at NLNG to adhere to our principles on equal opportunity.

In 2017, NLNG's labour practices were further enhanced with a focus on eliminating all forms of unhealthy working conditions through improved Work-Life Balance practices.





Cross section of participants at the 2017 NLNG Contractor CEO Safety Leadership Conference



## IMPLEMENTATION

In our support of UNGC Labour principles, we expect similar commitment to Equal Opportunity by our stakeholders as stated in our Business Principles and in Principle 3.5 of Our Code of Conduct Behaviours, namely:

- When making employment decisions, including hiring, evaluation, promotion, training, development, discipline, compensation and termination, you must base them solely on objective factors, including merit, qualifications, performance and business considerations.
- You should understand the value of diversity and must not discriminate in any way based on race, colour, religion, age, gender, disability, ethnic origin or nationality.



The 2018 Drive Safe Campaign was a very interactive affair with recognitions and celebrations of deserving participants.





The 2018 Drive Safe Campaign kicked off in NLNG offices in Nigeria with Learn & Share sessions which were engaging with rich conversations around Fatigue, Driver Distractions and In-Vehicle Monitoring System, (IVMS).

## MEASURES OF OUTCOMES

In 2017, NLNG's progress in promoting Labour practices can be measured by the following key positive outcomes that support all the UNGC principles on labour:

### Work-Life Balance

- In 2017, the atmosphere of healthy collective bargaining between the company and labour unions resulted in the introduction of the following work-life balance provisions in our Conditions of Service:
  - i. Working from alternate locations
  - ii. Flexible working terms
  - iii. Compressed working hours

### Equal opportunity employment

- NLNG's commitment to the elimination of discrimination in respect of employment and occupation as well as promotion of equal opportunity was sustained in 2017 with the recruitment of young graduate trainees and technicians from across the country in company's effort at replenishing the talent pipeline while reflecting Nigeria's diversity.

Details of some of these activities can be found in our *Facts and Figures on NLNG 2017* and in relevant sections of our website, <http://www.nigerialng.com>



## ENVIRONMENTAL PRINCIPLES

### **Principle 7:**

Businesses should support a precautionary approach to environmental challenges

### **Principle 9:**

Encourage the development and diffusion of environmentally friendly technologies

### **Principle 8:**

Undertake initiatives to promote greater environmental responsibility; and challenges

**NLNG has aligned itself with Principles 7, 8 and 9 of the UNGC on the Environment through its policies and practices as evident in Our Code of Conduct and the Business Principles:**



Finima Nature Park, approximately 1000 hectares, has been set aside by NLNG for conservation, recreation, and research on the fauna, flora and cultural heritage of its primary host community, Bonny Kingdom.

## ASSESSMENT, POLICY AND GOALS

As part of NLNG Statement of Business Principles, we commit to the tenets of sustainable development. This requires balancing short and long-term interests, integrating economic, environmental and social considerations into business decision-making.

Specifically, Principle 3.1 of NLNG Code of Conduct on Health, Safety, Security and the Environment states that NLNG has a systematic approach to health, safety, security and environmental management in order to achieve continuous performance management. To this end, NLNG manages these matters as critical business activities, sets standards and targets for

improvement, and measures, appraises and reports performance externally.

In our environmental practices, Nigeria LNG Limited ensures continuous compliance with applicable legislations as stipulated by the various regulatory bodies in Nigeria: Federal Ministry of Environment (FME), Department of Petroleum Resources (DPR), Rivers State Ministry of Environment (RSME), etc., that issue permits for her various operations. We carry out regular reviews and evaluation of existing and proposed environmental laws and regulations that impact or have potential impact on NLNG Business.



## IMPLEMENTATION

With regard to the environment, NLNG has a sound Health, Safety and Environment (HSE) policy anchored on the need to take proper care of its assets, the health and safety of its employees and stakeholders, and to give proper regard to the sustainable management of the environment.

In line with this and in alignment with relevant Principles, NLNG plans its work to:

- Prevent injuries and ill-health to workers and surrounding communities;
- Prevent damage to assets and minimise any negative impact on the environment;
- Avoid or eliminate future liabilities;
- Meet requirements for demonstrable due diligence.

NLNG being the first major multinational company in Nigeria to complete full EIA process for all of its Trains 1-6 before commencement of business, regularly interfaces with the Federal Ministry of Environment (FME) and other relevant stakeholders, locally, nationally and internationally on environmental issues.

An important element of the EIA process is to identify and mitigate potential adverse impacts of NLNG's operations. For NLNG's existing projects, a number of potential impacts (positive and negative) were identified and mitigation measures taken for the adverse impacts.

As a key stakeholder on issues that concern the environment, FME regularly carries out annual mitigation and compliance monitoring exercises of NLNG Projects.



NLNG/FRSC Child Safety Campaign, 2017

In addition, NLNG submits itself to external audits from independent auditors, e.g., British Standards Institution (BSI). NLNG is ISO14001:2004 certified as well as conducts regular monitoring of its own HSE performance, in pursuance of continuous improvement and to foster a positive HSE culture within the organisation.

On biodiversity and nature conservation, Nigeria LNG Limited has established a Nature Park on Bonny Island to preserve the natural environment of its host communities. The site of the nature park is the natural habitat of the Salt Water Hippopotamus, now rare in

Nigeria, and other interesting and unique flora and fauna prevalent on Bonny Island.

The park was established in recognition of the importance of preserving the ecosystem of Bonny Island, and as a commitment to keeping a permanent record of the sacrifices of Bonny people, their aspirations and their natural heritage and culture. It is also part of NLNG's contribution to national and global conservation, in line with Rio Agenda 21, the Ramsar Convention and Convention on Biological Diversity.





NLNG's 100 per cent Nigerian Senior Management Team is proudly supported by efficient and happy professionals.

## MEASURES OF OUTCOMES

In promoting the UNGC goals on Environment, NLNG has reported in its published *Facts and Figures on NLNG 2017* how it recorded significant progress in the following areas:

- i. Discharges to water
- ii. Sewage treatment and disposals
- iii. Solid waste management
- iv. Hazardous and Non-hazardous waste
- v. Air emission
- vi. Environmental noise measurement and performance

In pursuing its environmental objectives, the company considers public consultation and enlightenment fundamental to fostering good relationships with its neighbours, hence it has initiated forest protection and biodiversity conservation enlightenment campaigns in accordance with recommended EIA mitigation measures.

The company partners with community-based organisations such as the Bonny Environmental Consultants' Committee (BECC) and Nigerian Conservation Foundation (NCF) in outreach programs to schools, organisations and settlements within Bonny Kingdom with the objective of establishing conservation clubs in primary and post primary schools and entrenching a culture of conservation early in the youth. In 2017 over 7000 visits to the nature park were recorded, an over 100% increase in the total numbers of 2016.

Further details of our role in this aspect can be found in our *Facts and Figures on NLNG 2017* under “Biodiversity and Nature Conservation”. This is also available on NLNG website, <http://www.nigerialng.com>.



## ANTI-CORRUPTION PRINCIPLES

**Principle 10:**

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

NLNG's two major policies: Our Code of Conduct and Anti-Bribery and Corruption (ABC) Policy are well aligned with UNGC's Principle 10 on anti-bribery and corruption.



MD Division celebrating their victory for best presentation, HSE Day, 2018



## ASSESSMENT, POLICY AND GOALS

NLNG is committed to upholding the highest standards of ethics in our relationships with employees, customers, suppliers, shareholders, regulators and our host communities. This commitment is ensured through policies which guide the business in its relationship with stakeholders. Two of the key policies are: Our Code of Conduct, and Anti-Bribery and Corruption (ABC) Policy.

Integrity is a core value in NLNG and our strong commitment to Integrity is reinforced in our Statement of Business Principles that applies to all transactions, large or small, and drive the behaviour expected of every employee and director of NLNG in the conduct of its business at all times.

Specifically, Principle 3 of the General Business Principles states:

NLNG insists on honesty, integrity and fairness in all aspects of our business and expect the same in our relationships with all those with whom we do business. The direct or indirect offer, payment, soliciting or acceptance of bribes in any form including facilitation payments is unacceptable. Employees must avoid conflicts of interest between their private activities and their part in the conduct of company business. Employees must also declare to NLNG potential conflicts of interest. All business transactions on behalf of NLNG must be reflected fairly and accurately in the accounts of the company in accordance with established procedures and are subject to audit and disclosure.

The '*tone at the top*' towards Bribery and Corruption in NLNG is simple: it is one of zero tolerance. In order to drive this down the entire organization, the Anti-Bribery and Corruption effort of NLNG is multi-faceted, to assist employees and stakeholders to manage the inherent risks.

## IMPLEMENTATION

In line with Principle 5.1 of Our Code of Conduct (on Anti-Bribery and Corruption), we build relationships based on trust, and we are determined to maintain and enhance that trust, thereby protecting our reputation. As such, we never accept or pay bribes, including facilitation payments. Even unsubstantiated claims of bribery and corruption may damage NLNG's reputation.

Everyone involved with NLNG's business must comply with the anti-bribery and corruption (ABC) laws of Nigeria and of the countries in which we operate and do business. Involvement in bribery and corruption will attract disciplinary action, dismissal, legal proceedings and, possibly, imprisonment.

Specifically, we expect the following commitments from our stakeholders:

- You must not offer, pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment or to gain a business advantage. You must not allow anybody else to do so, on your behalf.
- You must not make facilitation payment or other such payments. If a facilitation payment has been requested or made, you must immediately report it to your line manager.
- Know who you are doing business with by conducting appropriate due diligence as set out in the ABC Manual.
- Dealing with government officials poses a greater bribery risk so you must follow the mandatory requirements in the ABC Manual.



- You must comply with all anti-bribery and corruption laws of Nigeria and those of other countries we have dealings with.
- You must report corrupt behaviour. Turning a blind eye to suspicions of bribery and corruption can result in liability for NLNG and for individuals.

NLNG requires all staff members to declare any perceived or actual conflict situations that exist during the course of their engagement with the company. Declared conflicts are reviewed and resolved by company management.

Employees are also required to declare any gifts and hospitality given/received from the company's business partners/associates. The annual conflict of interest declaration also provides a medium for staff members to attest to the NLNG Code of Conduct &

## Business Principles.

To further emphasise our commitment to fighting corruption, NLNG Ethics Line was set up in 2012 and, since then, has been providing a platform that allows for confidential, anonymous submission of information on unethical business practices, potential violation of laws, rules, regulations or any policies.

NLNG Ethics Line is a toll free resource managed by an external party. No call tracing or recording devices are ever used, and callers may remain completely anonymous, if they so wish. Callers are given a number and call back date at the end of their calls. Should they desire to follow up on the status of their report, or want to provide additional information, they simply call back and reference this information.



The Deputy Managing Director, Sadeeq Mai-Bornu (third left), and other staff on Management Facility Inspection during Train 3 Shutdown activities, 2017

## MEASURES OF OUTCOME

### **Anti-Bribery and Corruption Training and Awareness**

In 2017, NLNG set out to consolidate on and sustain the gains of the previous years in embedding the ABC principles. This was achieved by addressing the gaps identified in 2016 which included, amongst other things, improving record keeping in Gifts and Hospitality to Government Officials, and revising NLNG ABC foundation documents, namely: the Code of Conduct and NLNG Standard on Company Sponsored Travel for Government Officials. All these activities are aimed at raising awareness on current developments and the required ethical considerations in the company's supply chain.

### **Integrity Barometer Journey**

From 2013 to 2014, NLNG undertook a baseline Integrity Barometer assessment to provide a simple exposition of the effectiveness of its policy and actions on anti-corruption governance in relation to the company's operations across all key sectors and divisions.

Subsequently, a review was carried out every year up to 2017 to ascertain the progress made on agreed key focus areas of the Transparency Index, for company to track and monitor its business landscape for compliance with national and international standards on ABC.



Going forward, company will continue with both the annual self-assessment of identified parameters and stakeholder survey to continuously monitor its performance around this very important business integrity index.

## **Conflict of Interest (Col)**

In 2017, Col declaration recorded significant improvement in compliance due to increased awareness via the Code of Conduct roadshow, continuous engagement of staff in closing out declared conflicts as well as introduction of additional Col declaration platforms for personnel in recruitment functions.

## **Ethics Line (the “whistleblower”)**

In 2017, the ethics line platform continuously provided company with additional windows of proactively managing potential and actual risks associated with unethical behaviour in the organisation.

Further details of our anti-bribery and corruption (ABC) program and the Whistleblower platform can be found in our published *Facts and Figures on NLNG 2017* and under the “Anti-Bribery and Corruption (ABC)” and “Whistleblower” sections of the NLNG website, <http://www.nigerialng.com>

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COMPANY



The 2018 NLNG CONTRACTOR  
SAFETY LEADERSHIP  
CONFERENCE

THEME: \_\_\_\_\_  
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NLNG MD/CEO, Tony Attah, addressing contracting companies' chief executives during the 2018 NLNG Contractor CEO Safety Leadership Conference



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