
Sustainability Report

2020



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Introduction

- Message from our CEO
- Response to COVID-19

Message from our CEO

Response to COVID-19 Pandemic



The global crisis of 2020 caused by the COVID-19 pandemic posed a serious challenge to all business sectors and required urgent action to maintain both security and economic stability.

In 2020, Nobel Oil introduced a number of protocols to ensure the protection and safety of its employees and the business continuity.

Given the current situation, the Company made the decision to establish an Emergency Situations Committee to coordinate the implementation of priority measures to prevent the spread of the coronavirus infection at Nobel Oil Group's facilities.

This Committee actively monitors the evolving COVID-19 situation, works with the Company management and receives signals from local and national governments, the World Health Organization and national health authorities to adjust our response to the pandemic as needed.

During the reporting period, the issue of health and safety of the employees became particularly important in connection with COVID-19. The Company promptly took all necessary measures and successfully adapted to the new working environment.

As the virus spread, we promptly introduced a set of measures to protect our employees. These include mandatory wearing of facemasks and gloves, daily health checks (including temperature), as well as daily disinfection of premises, equipment and vehicles. All employees of the Group were informed about personal safety precautions and urged to comply with the rules of social distancing.

In order to reduce the number of gatherings, the working schedule of office-based employees was changed. The Company arranged for the transfer of office-based employees to working remotely and provided the facilities required for a smooth transition. Employees not involved in continuous production processes have been transferred to working from distance.

All corporate events (large-scale meetings, trainings, etc.), as well as business trips (with the exception of rotation personnel), were canceled or postponed until a later date.

In addition, Nobel Oil has launched a COVID-19 testing program that covers key personnel in all divisions.

The Company's rapid response to the problems and challenges posed by the pandemic has enabled a continuity of our business and contributed to the protection of employees and local communities from the implications of the pandemic. In 2020, the Company met all its operational goals despite the consequences of lockdowns and the speed with which the virus spread.

Nonetheless, the COVID-19 pandemic has clearly shown how important social factors are for business sustainability.

About this Report

- Overview
- Stakeholder Engagement
- Materiality Assessment

Report overview

Nobel Oil presents the 3rd Sustainability Report (hereinafter – the Report), which reflects the results for the time period from January 1 to December 31, 2020. The previous Report was published in June 2020 (for the time period from January 1 to December 31, 2019).

We have been publishing Sustainable Development Reports since 2018, addressing a wide range of stakeholders and striving to present information relevant to each group in a balanced manner.

Open reporting allows the Company the opportunity to demonstrate its adherence to the principles and concepts of corporate social responsibility (CSR) and sustainable development and provide information relevant to stakeholders on the economic, environmental, social, ethical aspects of the Company's activities, as well as information on corporate governance and its contribution to UN Sustainable Development Goals for the period up to 2030.

In addition, due to the coronavirus pandemic, special attention in the report is paid to the Company's measures related to COVID-19.

The information contained in the Report is confirmed by the heads of functional divisions, and the final document is approved by the Chief Executive Officer (Chairman of the Board of Directors) of the Company.

Reporting standards

When preparing the Report for 2020, the instructions of the Global Reporting Initiative for Sustainable Development (GRI Standards) were taken as a methodological basis. Also, when covering some topics, we relied on other authoritative standards and guidelines in the field of non-financial reporting: ISO 26000, Sustainability Accounting Standards Board, UN Global Compact.

Information on the results of financial activities is presented in the Report for Nobel Oil Group in accordance with the Consolidated Financial Statements prepared in accordance with IFRS.

Scope

The boundaries and scope of the report remain the same. The scope of the Report includes the Nobel Oil Group head office, which provides managerial supervision and management of the companies, Glensol, a subsidiary that provides equipment maintenance services primarily for customers in the energy sector, and Prokon, a company engaged in construction, engineering, procurement and project management services.

Contacts

Comments and suggestions on sustainable development reports can be sent to the Email address indicated in the "Contact information"

section. All messages are reviewed and taken into account in the process of work on the next Report.



Stakeholder Engagement

As a responsible company, Nobel Oil understands the importance of mutually beneficial partnership with a wide range of stakeholders, as these relationships lay the foundation for achieving strategic goals and business development.

We strive to build long-term efficient relationships with stakeholders based on the principles of partnership, business transparency and publicity. The principles and procedures for stakeholder engagement are set forth in our Code of Conduct and Business Ethics.

To interact with stakeholders, the Company has created various communication channels and methods that provide an opportunity for different groups of stakeholders to bring their recommendations, concerns and questions to the attention of Nobel Oil. We are attentive to all inquiries from our stakeholders.

Important stakeholders for Nobel Oil are Company employees, shareholders and investors, customers and business partners, authorities and local communities, contractors and suppliers. Relations with

stakeholders are continuously evolving and improving. The company aims to identify the interests and proposals of stakeholders in a timely and complete manner, develop and improve management practices, develop interaction mechanisms, and enhance the dialogue in all spheres of activity.

In 2020, due to the COVID-19 pandemic and relevant restrictions for the Company, many traditional contacts and work processes were successfully moved online using modern digital solutions. We have made every effort to maintain a high level of openness and information transparency taking into account the emergence of fundamentally new issues related to the pandemic.

Here are our stakeholders and how they interact:

Shareholders

- General meetings of shareholders
- Regular meetings of company managers with shareholders
- Shareholder requests
- Publication of annual reports

Investors

- Regular meetings of company managers with investors

- Publication of annual reports
- Participation in conferences, summits
- Conference calls for investors

Staff

- Collective and private meetings of company managers
- Employee engagement surveys
- Local health, safety, and security reviews
- Career development and performance reviews
- Publication of annual reports
- Yammer (internal social media) postings

State

- Relations with regulators
- Participation in working groups, Roundtables, conferences, forums
- Publication of annual reports
- Publication of press releases and information on important events

Customers

- Regular meetings
- Meetings and calls with account and project
- Statements of qualifications and requests
- for proposals
- managers and senior leaders
- Suggestions

- Contracts and agreements
- Client satisfaction surveys

Society

- Charity and sponsorship projects
- Reception days
- Publication of press releases and information on important events
- Publication of annual reports

Business partners, Suppliers and contractors

- Participation in working groups, roundtables
- Participation in conferences, summits
- Contracts and agreements
- Supplier selection procedures
- Participation in conferences and exhibitions

Media

- Press conferences
 - Press releases
 - Special events
 - Written and oral communication
-

Materiality assessment

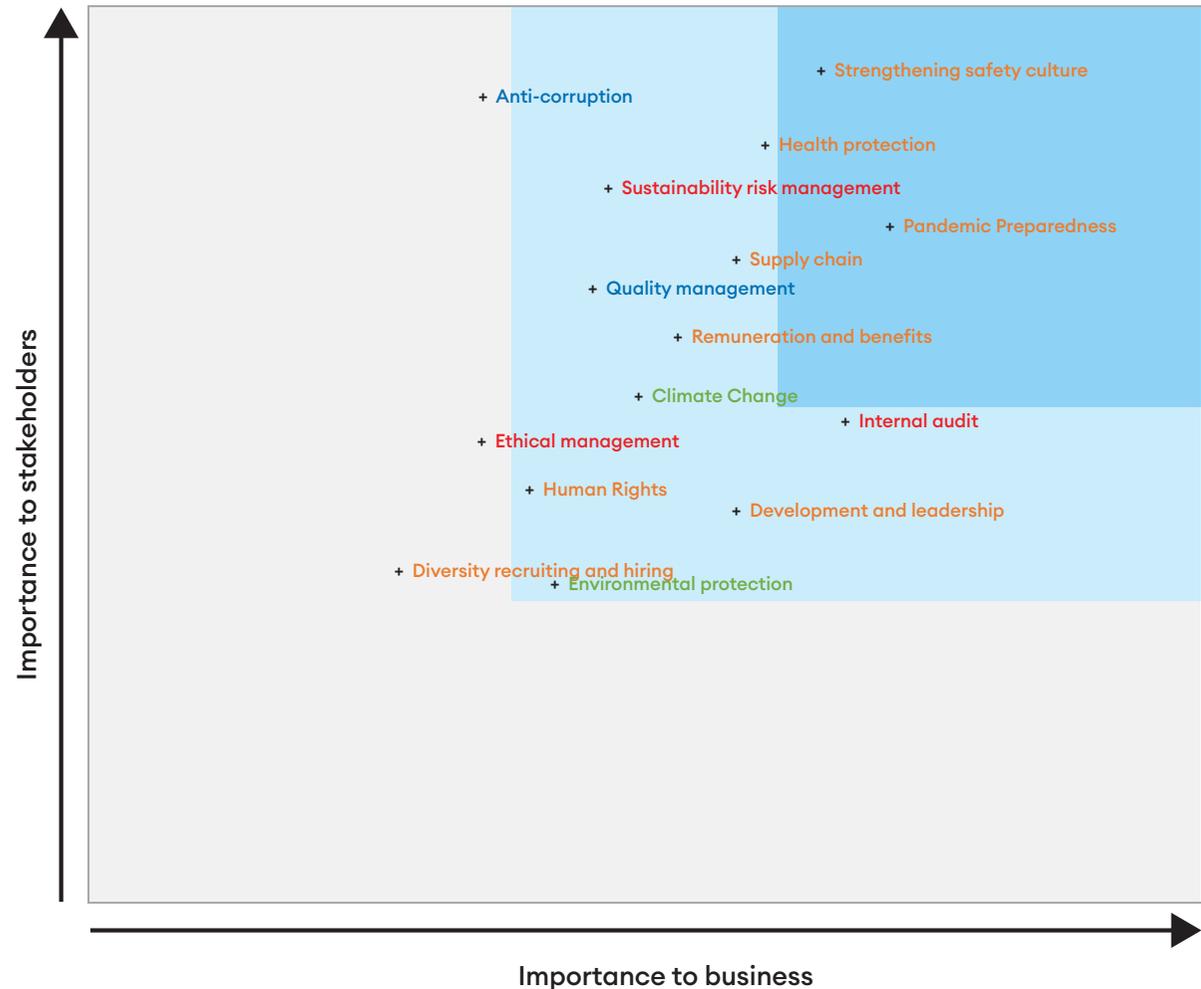
The topics reflected in the Report and forms of their presentation are determined with due consideration of stakeholder opinions and sustainability context, in the interests of completeness and accuracy of the data presented and comparability against previous years.

Furthermore, in order to prioritize the most significant subjects, we have investigated the sustainability reports of international companies, international ESG standards, internal strategies and regulations and current topics in the media.

When assessing a topic for materiality, two main criteria were used: “Importance to business” and “Importance to stakeholders”.

The assessment identified 15 material topics (shown in detail in our materiality matrix) considered most critical to the Nobel Oil business and our stakeholders.

Materiality Matrix

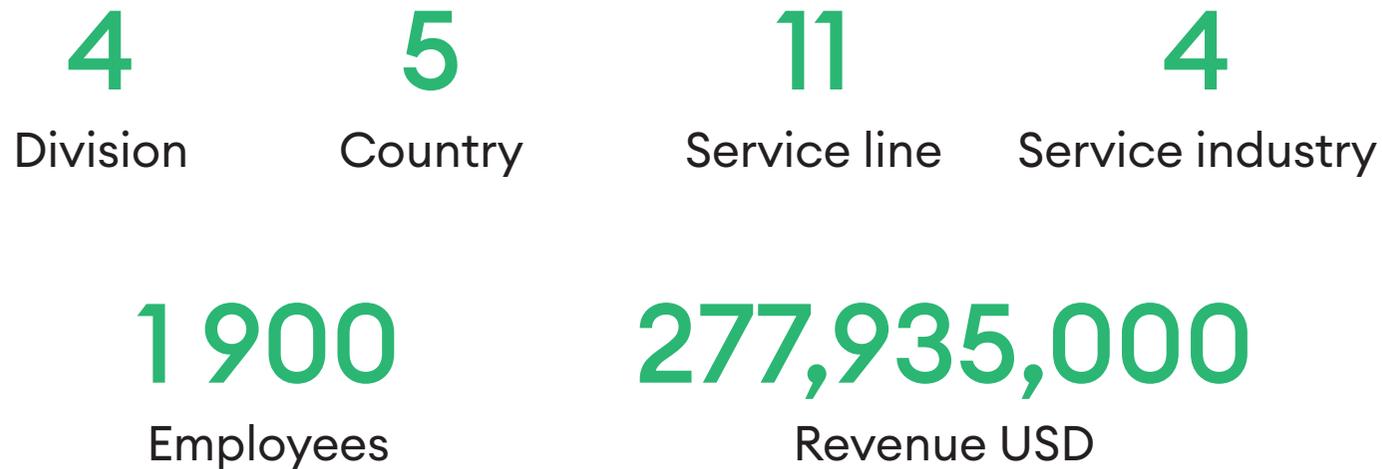


About Nobel Oil Group

- Company Overview
- Business Area
- Financial Performance
- Nobel Oil Group's Contribution to UN SDGs

Company overview

Nobel Oil Services is a diversified group of companies specialized in the energy industry. Companies operating within Nobel Oil Services provide drilling, construction and project management, as well as equipment maintenance, PSCM and enhanced oil recovery services, while successfully expanding their activities in the respective fields.



We have managed to build a rich portfolio by keeping a close watch on changing market trends and discovering promising courses of development. Having earned a reputation as a reliable and trusted partner in the market, we are driven by a strong desire to expand our business to a greater region.

Nobel Oil Services (UK) Limited is a parent company of Global Energy Solutions, PROKON, SOCAR AQS and Llamrei. It also has several joint venture companies such as GVL, SDL Denholm Limited, Lamor NBO, Wood Group Azerbaijan and Turan Drilling & Engineering Company.

Nobel Oil Services employs 1,900 people through its subsidiaries and joint ventures and contracts an additional workforce of over 5,000 people to execute large-scale projects.

Business areas

Service

DRILLING SERVICE

We provide a variety of services involving drilling and comprehensive well management. This includes drilling, design and planning of horizontal, multi-bore and deviated boreholes, well completion, overhaul and geo-technical measures in wells, drilling of sidetracks, installation of casings.

PRODUCTION AND INSTALLATION

We provide onshore and offshore production and installation services, which include fabrication, installation and upgrade of offshore facilities and pipeline systems, high-pressure lines, tanks, reservoirs and related packages.

CONSTRUCTION

We offer construction and management services specializing in the design and installation of offshore gas injection facilities and power plants, onshore and offshore oil and gas refining installations, polymer and fertilizer plants. We also provide infrastructure construction services.

ENGINEERING

We provide installation, commissioning, operation and maintenance of gas turbines and compressors, as well as inspection and maintenance of rotating and static equipment. GLENSOL, in cooperation with Suez, provides a variety of water treatment solutions.

SUPPLY AND LOGISTICS

We provide our customers with a broad range of materials and equipment for drilling, design, maintenance and production operations with the goal of optimizing the flow of materials and equipment from their origin to delivery.

PROJECT MANAGEMENT

Our project management experience and qualified team offer project management services in engineering, procurement and construction in line with existing standards to deliver projects on time and within budget.

Sector

OIL AND GAS

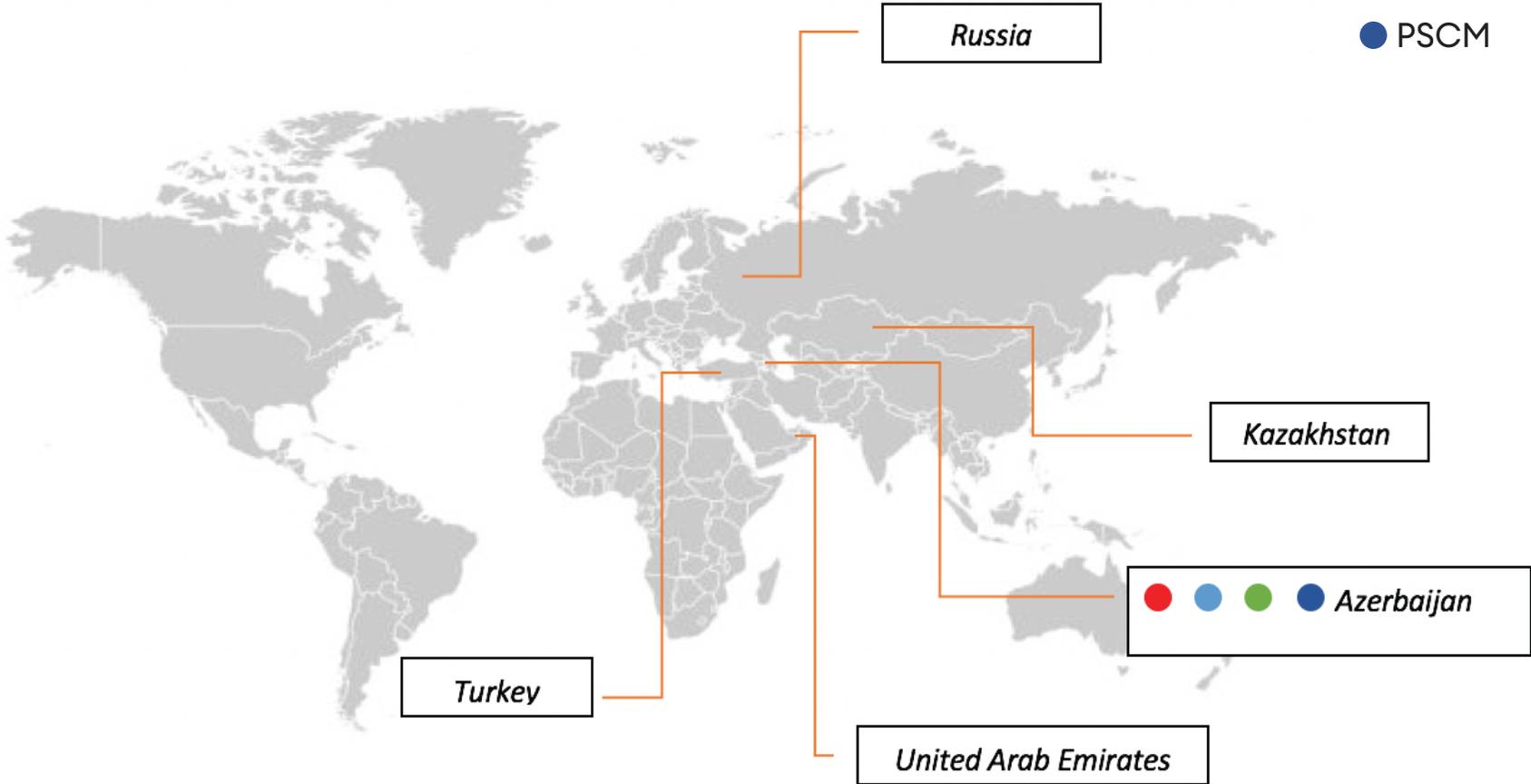
ENERGY

ENERGY AND WATER

CONSTRUCTION

Service type

- Drilling services
- EPC&CPM
- INTEGRATED SERVICES
- PSCM



Financial Performance

Total revenues, USD `000

277,935

Net revenue

Revenue by business, USD `000

223,400

Construction

6,703

Rental income

24,522

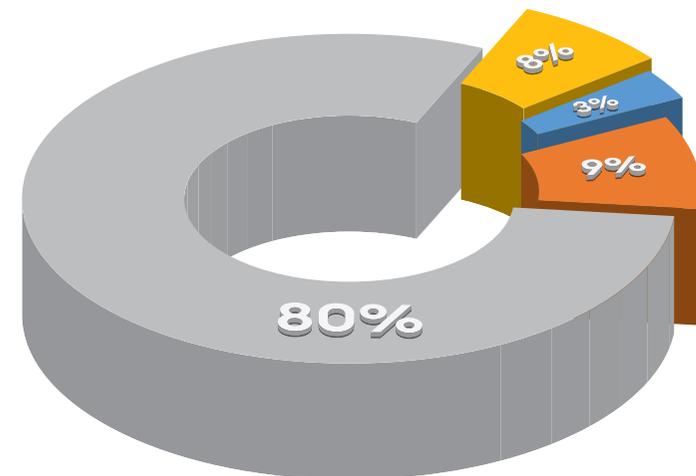
Provision of service

23,310

Sale of goods

Revenue by business, %

■ Rental income ■ Sale of goods
■ Provision of services ■ Construction



Nobel Oil Group's Contribution to UN SDGs

In 2016, the United Nations Assembly adopted 17 Sustainable Development Goals. They encompass economic, environmental and social issues and are designed for the period up to 2030.

While the signatories, that is, the main addressees are all states, the cooperation of other participants, including companies, is critical for the realization of these goals.

Nobel Oil as a business representative, i.e. one of the parties, shares the ambition of the world community to achieve 17 sustainable development goals. The company strives to do its best to follow these efforts.

To achieve these goals, Nobel Oil is already making significant efforts and will continue to work in this direction in the future in order to make a positive contribution to sustainable development.

We will contribute to sustainable development by minimizing the negative impact of our business activities, as well as those of our clients, while maximizing our opportunities.

In 2020, the Company analyzed all the SDGs again, examining in detail sub-goals behind each SDG and their relevance to our business strategy and approach to sustainable development. Thus, we have identified a list of SDGs in which the Company has the most significant influence.

These goals and objectives have been incorporated into our operational programs, which are implemented in the organizations of Nobel Oil Group and are part of corporate planning. Therefore, we believe that their implementation, along with other steps taken by the Company, largely determines the contribution that the Company makes to the achievement of global SDGs.





The safety and health of employees is an absolute priority for the Company. The Company implements extensive procedures and standards that guarantee health and safety of personnel at the workplace and production facilities in all areas of work and projects.



We actively promote a culture of continuous development for our personnel to create an environment, in which employees can succeed and develop their careers, while also increasing productivity.

In addition, the Company, implementing the "Paid Summer School" program, improves the practical knowledge of young professionals.



The Company actively supports decent work and new opportunities for its employees. We create jobs and conditions to maintain productive employment and motivate our employees, provide a decent level of remuneration, and implement popular social programs.



We strive to apply advanced and innovative technological solutions and environmentally safe and energy efficient technologies in all areas of our business. The Company sees this as strategic investment in a sustainable future.



We adhere to the principle of rational consumption of all types of resources, including energy, fuel, water and other used in our activities, reducing costs and increasing efficiency of consumption.

Sustainable consumption also includes prevention of waste accumulation by the Company and the reduction and/or prevention of waste generation by recycling and reuse where possible.



The Company attaches special importance to rigorous compliance with legislation, the fight against corruption and fraud, and prevention of conflict of interest.

Our approach to sustainable development

- Our approach
 - Sustainable development management
 - Internal Audit
 - Sustainability risk management
-

Our approach

We are aware of the important role the principles and values of sustainable development play in the growth and prosperity of our business, and therefore, we are constantly working to integrate them into our business processes.

Our commitment to sustainable development and special attention to ESG factors not only positively affect the image of the business, but also increase its market value.

The Company continually strives to improve the efficiency of its sustainability performance through the application of best practices incorporated in key sustainability initiatives and policies.

Our approach to sustainability begins with ensuring that we conduct our business responsibly and prioritizing the safety of our people, clients and communities.

The Company is constantly looking for opportunities to make a positive impact, from creating a diverse and motivated workforce and reducing greenhouse gas emissions, to directing our innovations and technologies to address tomorrow's sustainable development challenges.

In addition to working on our own

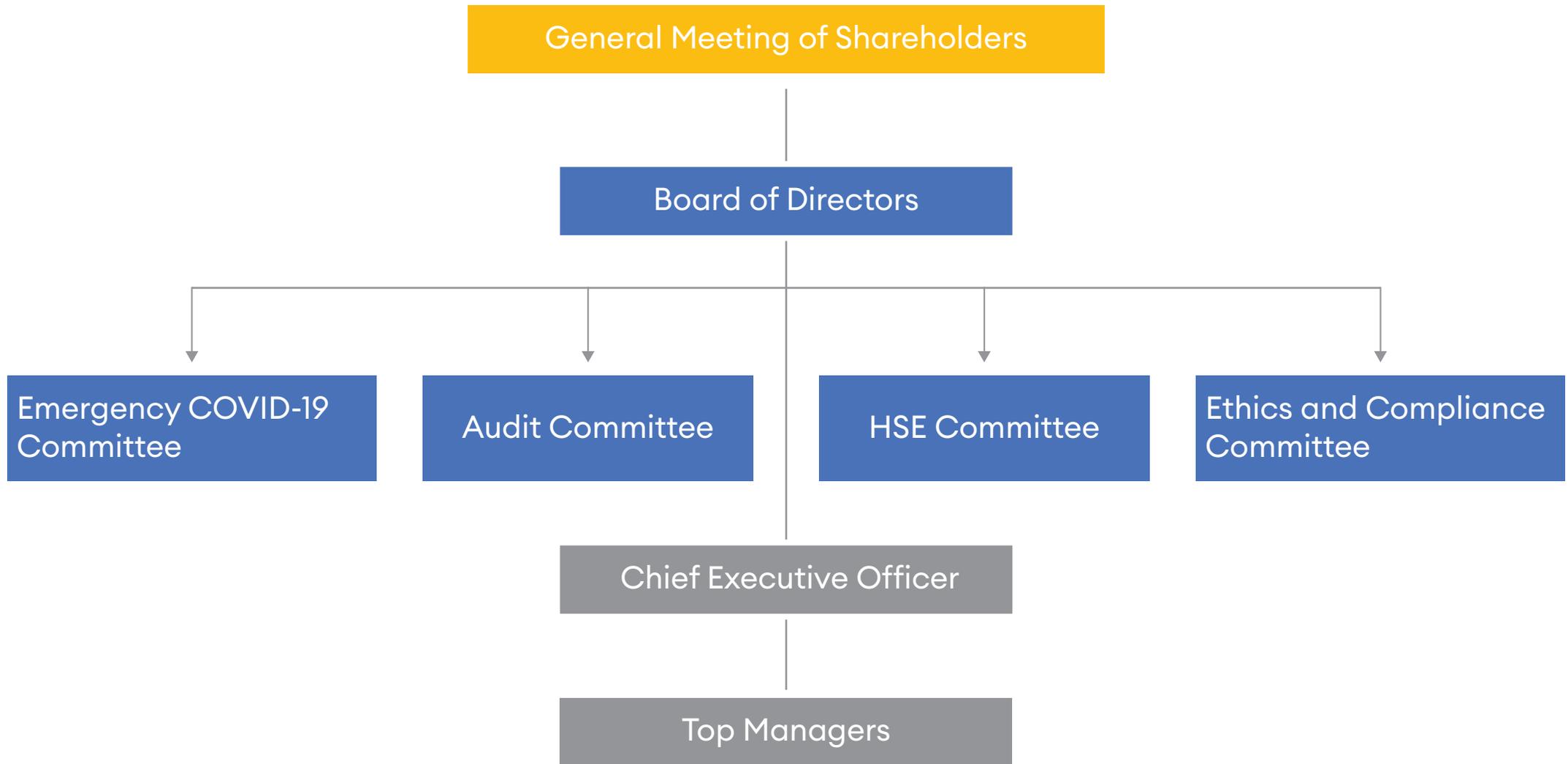
sustainability goals, we are also looking for ways to support our clients' efforts in this area.

Through effective design and planning, we help our clients to solve their problems by identifying and finding ways to make their projects more sustainable.

When we work on a project, we focus on helping our clients to create a positive legacy that includes safety, environmental protection, and economic growth and development.

In Nobel Oil, decisions on sustainable development are made at the highest corporate level. The Board of Directors and executive committees are actively involved in the sustainable development management process. Ultimate responsibility for sustainable development rests with the Board of Directors, which sets the strategic vision and key areas for the implementation of programs in this area.

Governance structure



Sustainable development management

Strong leadership and high management standards are fundamental for building a sustainable and successful organization, in which stability is created at all levels. The company understands that in order to improve efficiency, it is necessary to have a management model consistent with the best practices, which will enable development and decision-making to achieve strategic goals at all organizational levels. In this regard, in addition to the requirements of local and UK legislation and the provisions of internal documents, the Company takes into account a number of requirements of various standards and codes, as well as the best international practices.

Management of sustainable development issues in the Company is integrated into the general corporate system. Our Board of Directors is the body responsible for the overall management of the Company's activities. Its competence includes resolving general management issues of the Company's activities, prioritizing areas of the business, the Company's development strategy with the exception of issues falling under the competence of the General Meeting of Shareholders.

The composition of the Board of Directors is balanced from the perspective of its members

possessing the key skills necessary for effective work. Members of the Board of Directors are recognized professionals in decision-making in the areas of strategic planning, production, international cooperation and business, risk management, analysis of financial reporting, human resources management, marketing and sustainable development. [The Board of Directors, which is elected by the General Meeting of Shareholders, includes one executive and two non-executive members.](#)

To ensure a detailed study and understanding of the Company's activities, development strategy and key risks, members of the Board of Directors hold regular meetings with the management of Nobel Oil. In addition, members of the Board of Directors have the opportunity to hold formal and informal meetings with mid-level managers to discuss various issues and exchange information necessary for the participation in meetings and take timely well-informed decisions. Meetings of the Board of Directors are held as required, however at least bimonthly.

The main items that are usually discussed during Board meetings on a quarterly basis include:

- Achievements and major concerns of the Company and its subsidiaries;
- Strategic objectives;
- Operating Model Implementation;
- Emergency Response/COVID-19 Response;
- Corporate QHSE report and statistics;
- Corporate Headcount;

- Corporate Ethics and Compliance Report;
- ISO ABMS 37001 implementation status;
- Current Contracts and Potential Projects and Future Opportunities;
- Further Opportunities on Business Development.

The Chief Executive Officer carries out day-to-day management of the Company's activities and acts within the powers established by the Company's Charter.

He implements the tasks set by the Board of Directors and the Company's Development Strategy, supervising divisions in certain areas of activity - production and environmental, financial and economic, social and legal.

Committees of the Board of Directors

Committees play an important part in maintaining high standards of corporate management by ensuring pre-review, comprehensive analysis of various issues and preparing appropriate recommendations to the Board of Directors. The Board of Directors has four committees: The Health, Safety and Environment Committee, the Ethics and Compliance Committee, the Emergency COVID-19 Committee, and the Audit Committee.

Name	Function	Committee members	Issues reviewed by the Committee
Health, Safety and Environment Committee	The Committee regularly reviews health, occupational safety and environmental issues, including materials on production activities, summary reports on performance results, and makes decisions to achieve the Company's goals.	<ul style="list-style-type: none"> - Leader of HSE team, chairperson and secretary - Chief Executive Officer, member - Chief Operating Officer, member - Chief Commercial Director, member - SOCAR AQS – General Director, member - SDL NOBEL – General Director, member - GLENSOL – General Director - PROKON – General Director - OGP – General Director, member 	<ol style="list-style-type: none"> 1. Monthly Group HSE performance 2. Incidents/accidents/near misses 3. Group Objectives/LITR&TIR 4. New initiatives, programs
Ethics and Compliance Committee	The Committee regularly reviews ethics and compliance issues, including measures to control key ethical risks. The Committee participates in facilitating the development, implementation and functioning of effective programs for compliance with ethical and legal standards.	<ul style="list-style-type: none"> - Specialist on ethics and compliance, chairperson and secretary - Chief Executive Officer, member - Chief Operating Officer, member - Chief Commercial Director, member - Chief Financial Director, member - Manager of legal team 	<ol style="list-style-type: none"> 1. Non-compliance on information security issues 2. Non-compliance on vendor validation procedures 3. Non-compliance on COI 4. Harassment
Audit committee	The Audit Committee is established by the Board of Directors and its scope is to assist the Board of Directors in fulfilling its responsibilities for overseeing the financial reporting process, adequacy and effectiveness of the Company's internal control and risk management frameworks, monitoring and reviewing the effectiveness of internal and external audits.	<ul style="list-style-type: none"> - Independent consultant, chairman - Member of Board of Directors, member - Member of Board of Directors, member 	<ol style="list-style-type: none"> 1. Execution status of Internal Audit Plan for 2020 2. Internal Audit Reports submitted during 2020 3. Financial Statements audited by external auditors 4. Implementation status of management action plans on completed audit engagements.
Emergency COVID-19 Committee	The committee coordinates the response to the COVID-19 pandemic.	<ul style="list-style-type: none"> - Deputy Chief Financial Officer, chairman - Chief Operating Officer, member - Ethics and Compliance Officer, member - Group QHSE Manager, member - Group HR Manager, member - Senior Lawyer, member - PR Specialist, member - GLENSOL – General Director - PROKON – General Director 	<ol style="list-style-type: none"> 1. A set of measures for the security and safety of employees and business continuity 2. The compliance with the quarantine regime requirements.

Audit committee

In 2020, a meeting of the Nobel Oil Board of Directors decided to establish an Audit Committee consisting of 2 directors.

This decision represents another step towards further improvement and development of the Company's corporate governance system.

An Internal Audit Policy was approved at the meeting of the Board of Directors. This policy is a fundamental document that defines the purpose, principles, responsibilities, powers and procedures of internal audit in accordance with the definitions of internal audit, the code of ethics and international standards of professional practice of internal audit. When developing the Audit Policy, the best international standards of internal audit and corresponding legal provisions on internal audit were used.

In accordance with the Policy, the main goal of establishing the Audit Committee has been to facilitate control by the Company's Board of Directors.

The Audit Committee acts on the basis of the Company's Charter and the Regulations on the Audit Committee.

The purpose and scope of the Committee is to assist the Board in fulfilling its responsibilities for:

- Overseeing the financial reporting process, including internal control structure and procedures for financial reporting of the Company, monitoring the integrity and relevance of the Company's financial statements;
- The manner in which the Company's management ensures and monitors the adequacy of financial and operational internal controls and risk management processes designed to manage significant risk exposures;
- Overseeing the Company's governance practices;
- The selection, compensation, independence and performance of the Company's external auditors;
- The independence and performance of the Company's internal auditors.

The Committee meets at least four times a year ("Regular Meetings") with the power to convene additional meetings ("Extraordinary Meetings") as appropriate. Extraordinary meetings are convened on the initiative of one of the members of the Committee, on the initiative of the Board or the general meeting of the Company.

Decisions on any item in a Committee meeting are made on the basis of a majority vote. Voting is based on the "1 member - 1 vote" principle. No member is permitted to delegate their right to vote to another person, including another member of the Committee. In case of a tie, the Chairman of the Committee casts the final vote. If one of the Committee members does not agree with the final decision on any item in the agenda, he/she has the right to escalate that particular item to the Board via the Committee Chairman. The Shareholder has the right to veto Board decisions on items escalated from the Committee.

Internal Audit

The purpose of the Internal Audit (IA) in the Company is to increase value for shareholders by providing risk-based and objective guarantees, advice, recommendations and analytical data.

The IA operates in accordance with the International Internal Audit Standards and relevant legislative regulations on internal auditing.

The key document describing the internal audit process is the Internal Audit Procedure. The IA Procedure is an integral part of the Internal Audit Policy and is based on the Policy principles and requirements.

The Internal Audit Procedure outlines the Internal Audit process, which aims to assist the Audit Committee, the BoD and the Management in the effective exercise of their duties and responsibilities and to promote

effective management and control at reasonable cost through the provision of information with analysis, appraisals, recommendations and pertinent comments concerning the activities reviewed.

The Internal Audit established in the Company is independent of the business and is not responsible for the operational management of the business. This ensures the integrity and objectivity of its reviews. In order to maintain independence, the Internal Audit is not used where there is or may arise a conflict of interest.

If the independence or objectivity of the Internal Audit are actually or potentially undermined, details of that should be communicated to the Audit Committee for discussion and decision-making. Any identified conflicts or similar actions must be resolved in accordance with the Company's Code of Ethics and the Code of Ethics of the Institute of Internal Auditors.

Competency

Internal auditors apply the knowledge, skills and experience needed in the performance of internal audit services.

Objectivity

Internal auditors exhibit the highest level of professional objectivity in gathering, evaluating and communicating information about the activity or process being examined.

Integrity

The integrity of internal auditors establishes trust and thus provides the basis for reliance on their judgment.

Confidentiality

Internal auditors respect the value and ownership of information they receive and do not disclose information without appropriate authority unless there is a legal or professional obligation to do so.

Sustainability risk management

The Company recognizes that the ability to manage risks is vital for the long-term sustainability of a business. Our Company views the risk management system as a set of regulatory documents, where responsibility for risk management is distributed throughout the organization - from senior managers to all employees.

In our Company, we pay attention not only to strategic and financial risks, but also to the risks in the area of sustainable development. Our approach to risk management encompasses all our business processes and applies to all day-to-day operations. Sustainability risks related to health and safety, protection of the environment, human rights, regulatory compliance and local communities are covered by our regulatory documents and evaluated on an ongoing basis. This is evidenced by the presence of best practices in the sphere of health and safety, business ethics and environmental protection, which makes our Company an attractive partner.

Our approach to risk management consists of several sequential processes: risk identification, analysis, assessment, selection and application of response

measures, continuous monitoring and control. Risks are continuously identified and assessed as the relevant economic, environmental, social and regulatory environment evolves and our business changes.

Considering the specificities of our industry, the risks that can arise in project management can both directly affect the effectiveness of our business and damage our corporate reputation in the long run. Therefore, risk management is an ongoing process for the Company, and this continues to be the case throughout the life cycle of a project.

Ethics and Compliance

- Ethical management
- Anticorruption
- Human Rights

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Ethical management

Our activities are based on corporate values that allow us the opportunity to do our business in accordance with high ethical standards, including unconditional compliance with legal requirements, observance of human rights, rejection of corruption in any form and adherence to the rules of fair competition. The Company recognizes that in order to be successful, we must all act honestly, straightforwardly and fairly. Organization of effective work in these areas is a guarantee that we can build a reputation as an honest and conscientious partner, which is essential for earning and maintaining trust from stakeholders.

The importance on these issues is reflected in the Company's Code of Conduct and Business Ethics. The Code, approved by the Board of Directors, provides guidance and support to conduct business and maintain workplace behavior in accordance with the laws and regulations of the Company.

To ensure that our values are respected at all times, everyone working for the Company must read and comply with all requirements of the Code – whether they work on a permanent or temporary basis, as subcontractors or volunteers. The Code discusses key principles and sets clear rules and expectations regarding the conduct of all employees. Our Code guides employees on how to respond when they face ethical decisions and provides a variety of

channels for employees to report about anything they think is not in line with our values, policies or the law.

In addition, given the role of our supply chain partners in achieving our strategic goals, the Company is committed to creating a business environment, in which all participants in the supply chain and stakeholders respect the rules of business ethics. The principles and requirements of our Code of Conduct and Business Ethics set expectations that all counterparties of the Company such as contractors, consultants, service providers and representatives comply with the requirements of the Code.

To raise employee awareness of regulatory compliance and respond to potential violations of the Code in a timely manner, the Company organizes regular trainings for employees, including contractor employees. Comprehensive or group-specific trainings ensure that we familiarize our employees with the Code requirements.

During the reporting period, due to the Covid-19 pandemic, we created a new channel called “Ethics and Compliance Session” through the Stream app in Microsoft Teams. This application has allowed us the opportunity to conduct routine annual trainings on ethics and compliance with full accessibility for all employees of the Nobel Oil Group of Companies.

Employees underwent Ethics and Compliance training, Nobel Oil

50%

Employees underwent Ethics and Compliance training, Glensol

90%

Employees underwent Ethics and Compliance training, Prokon

100%

Mechanisms for submitting complaints and recommendations introduced by the Company enable confidential reporting about any actions or interactions that may violate our Code. Internally, our employees can report on misconduct using the Reporting Procedure, Hotline and by directly speaking to the Compliance Manager.

For all interested parties, we provide a confidential way to report about problems through the Hotline. It allows employees, customers, suppliers and other third party stakeholders the opportunity to report any

concerns they may have about inappropriate or illegal behavior, violations of Company policies or local legislation. The Company guarantees to all its stakeholders that it will not tolerate any reprisals against anyone seeking advice, raising concern or reporting an actual or suspected violation ([One may apply to the hotline by Email: \[ethics_nbo@nobeloil.com\]\(mailto:ethics_nbo@nobeloil.com\)](#)).

The mechanisms put in place to receive requests and feedback help the Company to examine complaints in a timely manner, resolve various conflicts and reduce the likelihood of similar situations recurring in the future.

Anti-corruption

The company views anti-corruption as one of the core principles of responsible business practice and operates in strict accordance with the local and UK anti-corruption laws. We highly value our reputation and do not accept any forms of bribery or corruption. We expect the same attitude towards corruption from our major stakeholders.

The main document regulating the fight against corruption in Nobel Oil is the Anti-corruption policy. The Policy establishes uniform principles, goals and objectives in the area of combating corruption, defines key mitigation measures that reduce the likelihood of corruption risks in the following situations: gifts and hospitality expenditures, conflict of interest, charity and sponsorship activities, interaction with counterparties, participation in political activities, interaction with the competitors, authorities, etc.

Our anti-corruption and anti-bribery guidelines have been developed in accordance with the requirements of regulatory acts of international and foreign legislation, as well as the recommendations of local, foreign and international bodies and organizations on anti-corruption enforcement. Key documents in the area of combating corruption and bribery are listed below.

- [UK Bribery Act, 2010](#)
- [US Foreign Corrupt Practices Act, 1977](#)
- [Code of Conduct and Business Ethics of Nobel Oil Services UK Limited](#)
- [OECD Convention Combating Bribery of Foreign Public Officials in International Business Transactions, 1997](#)
- [The United Nations Convention against Corruption, 2003](#)
- [ISO 37001:2016 Anti-bribery management systems – Requirements with guidance for use](#)
- [ISO 19011: Guidelines for Auditing Management Systems](#)

Nobel Oil has once again successfully passed the ISO 37001: 2016 Anti-Bribery Management System (ABMS) certification, which confirmed its high level of compliance.

In 2020, the leading international agency LRQA, which is a part of the British Lloyd's Register Group Limited, once again assessed the compliance of Nobel Oil's management system with the requirements

of ISO 37001: 2016, which is an important part of ethics and compliance. Through the application of internationally recognized best practices, we successfully passed the audit, reaffirming our commitment to working honestly and combating corruption.

In addition, the audit showed that actions the management has taken in relation to bribery, internal audit and analysis since the introduction of ABMS have resulted in improved system design.

When building an effective anti-corruption policy, it is critical to understand what corruption offences can be committed by our employees and stakeholders in general, taking into account the specifics of our activities and our business processes. In this context, the assessment of corruption risks is a vital element of our systematic and consistent approach to the prevention of corruption and bribery.

Taking into account the wide range of activities, the Company monitors each business process individually in order to avoid and reduce the risk of corruption. Thus, a special monitoring is carried out annually to determine corruption risks in all of the Company's main and secondary business processes. Potential business processes where a risk of corruption may arise are identified and various risk scenarios are developed taking into account the specifics of each process.

Besides, we assess any exposure to bribery and corruption when dealing with suppliers and business partners. When appropriate, we

develop a risk mitigation plan and decide not to work with a counterparty or reject tenders if we conclude that the risks are too high. We also conduct audits for anti-corruption compliance of selected suppliers subject to the availability of contracts ([more detail is available in the "Supply chain" section](#)).

All partners of the Company are informed that Nobel Oil has an Anti-Corruption Policy and strict standards of ethical business conduct. Since the anti-corruption clause is incorporated in all agreements between the Company and third party organizations, the partners assume obligations to comply with the provisions of the anti-corruption policy and ethical conduct.

For joint venture companies in which the Company or any of its subsidiary companies have a controlling interest, the Company ensures that the joint venture has an anti-bribery policy in place. The JVs in which the Company has 50 percent interest can apply this Policy subject to a joint agreement with partner(s) holding the remaining shares.

Human rights

One of the key factors in business ethics for Nobel Oil is respect for human rights. The Company does not tolerate any form of discrimination and does not use forced and child labor. In addition, each employee is provided with equal opportunities to exercise their labor rights regardless of gender, race, nationality, social status and official position, age, religion, political beliefs and other circumstances not related to professional qualities.

The Company complies fully with the Labor Code and legislation of the countries in which it operates. Thus, for example, by complying with the legislation of the Republic of Azerbaijan, the Company automatically complies with the requirements of most of the key conventions of the International Labor Organization in the area of human rights ratified by Azerbaijan.

In the internal documents of the Company, the principles of observance of human rights are reflected in such corporate documents as the Code of Conduct and Business Ethics, the Anti-Corruption Policy, the Health, Safety and Environment Policy. These documents guarantee equal employment opportunities for all.

The Chief Executive Officer of the Company, who is also the Chairman of the Board of Directors, is responsible for the observance of human rights. All employees of the Company are required to comply with the requirements of local and international laws and internal documents in the field of human rights. The Company has a clear management vertical, according to which critical issues related to the observance of human rights are brought to the attention of the Company management.

We ensure that our employees know their rights, and we raise the level of employee knowledge through regular meetings and communication mechanisms. The Company regularly holds meetings to discuss issues related to the observance of human rights, for example, the rights to fair and favorable working conditions, rights to social security, etc.

In terms of labor relations, the Company identi-

fies such risks associated with human rights as dangers to health and safety (injuries, occupational diseases, etc.), discrimination on any grounds, use of forced and child labor, violation of the terms of collective employment agreements and restriction of opportunities for creating associations.

The company examines the risks of human rights violations, including those that may occur during the interaction with suppliers. At the same time, the Company is aware that suppliers can be both the subject and the object of these risks. The Company makes sure that the partners share the ethical principles of the Company. In cooperation with suppliers, Nobel Oil also pays attention to assessing and mitigating the risk of corruption and other forms of unfair business conduct.

The mechanism of complaints implemented in the Company allows our employees, as well as external stakeholders, the opportunity to report any concerns or suspicions of human rights violations.

Our People

- Our approach
 - Staff portrait
 - Diversity recruiting and hiring
 - Employees' engagement
 - Development and leadership
-

Our approach

Employees form the core of our business and are a key factor for the long-term successful and sustainable development of the Company. We work on a day-to-day basis to create an effective management system to realize the potential and professional abilities of our employees and ensure high productivity and motivation.

We meet the legal requirements in the sphere of labor relations, including human rights, and strive to implement the best international practices. All employees of the company are familiarized with the internal labor regulations and the Code of Conduct and Business Ethics, which formulate the Company's approach to labor organization. In particular, the documents deal with safety, wages, length of a working day, non-discrimination, and confidentiality of private information.

HR policy

Attracting talent

We constantly look at who we are, how we perform and how we interact with each other to make sure we value and take into account the talents, skills and experience of our employees. The Company continuously examines and improves its policies and procedures, especially those related to talent management processes.

Remuneration and benefits

Our philosophy is to provide compensation and benefits that comply with the overall performance of the Company. The system of remuneration and benefits for Company employees aims to encourage employees to improve labor efficiency and achieve high productivity, as well as retain highly qualified personnel in the Company.

Development

Our aim is to create an environment in which employees succeed and develop their careers, while adding to the competence of their respective teams to achieve business goals. By fostering a culture of continuous development of our people, we spare no effort to ensure that we have the talent we need to improve our productivity now and in the future.

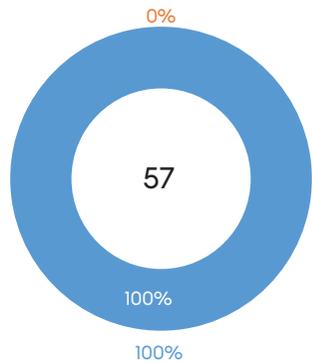
Employee engagement

We create a work environment in which employees feel involved and enthusiastic about their work. The communication system implemented in the Company provides employees with ample opportunities for feedback, understanding the Company's strategy and making a contribution to its future.

Staff portrait

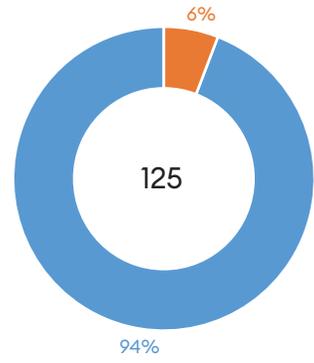
Total number of employees, Nobel Oil

■ Permanent ■ Temporary



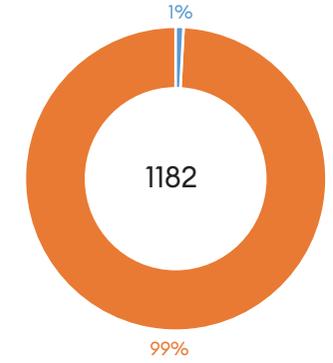
Total number of employees, Glensol

■ Permanent ■ Temporary



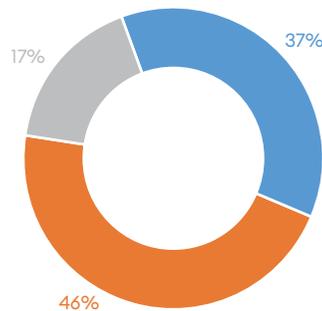
Total number of employees, Prokon

■ Permanent ■ Temporary



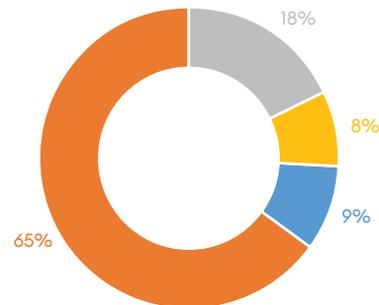
Total number of employees by category, Nobel Oil

■ Executive ■ Specialist ■ Manual labor



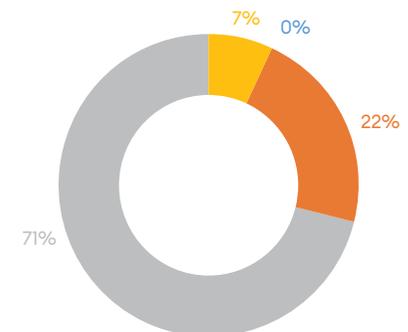
Total number of employees by category, Glensol

■ Executive ■ Specialist ■ Technician ■ Manual labor



Total number of employees by category, Prokon

■ Executive ■ Specialist ■ Technician ■ Manual labor



Diversity recruiting and hiring

Our employees are the most important asset of Nobel Oil, because our success depends only on them. We have over 1,900 employees throughout the Group, and they are all rallied around one common goal.

The Company strives to attract and develop people with different views, experiences and education, so that they, in turn, can assist us in our work. This is necessary for us to have access to a wider and more diverse pool of talented people. In this connection, we strive to ensure that our approach to diversity and inclusion is embedded in every step of the hiring process from job description to candidate selection. This ensures that we carefully and fairly consider all candidates for positions in the Company and contribute to the continuous development of all our employees regardless of their gender, nationality, race, religion, age, gender identity, sexual identity, etc. This approach is supported by our Code of Conduct and Business Ethics and Employment Procedures, which describe how our employees should act.

In the Company, we work to maximize the productivity of each individual and strive to create an environment in which teams can

come together and work towards ambitious goals. As people from different layers of society work together, respecting each other's different values, new concepts and ways of thinking are born and even more valuable and creative solutions are developed, leading to even better business results.

It is important for us to maintain a work environment in which all employees feel that they are treated fairly, respected, cared for and that the contribution they make to the Company is encouraged and welcomed. This is beneficial not only for us, but also for all our stakeholders. Therefore, with an emphasis on equality, we strive to ensure that all our employees feel engaged and valued for their efforts.

Our Company pursues a policy aimed at ensuring equal opportunities for people of all ages, including persons with disabilities, as well as providing equal wages to men and women.

Gender Representation

Male	Female	
64%	36%	Nobel Oil
93%	7%	Prokon
83%	17%	Glensol

Executive Team

Male	Female	
83%	17%	Nobel Oil
100%	-%	Prokon
50%	50%	Glensol

Age Representation

Under 30	30-50	Over 50	
26%	63%	11%	Nobel Oil
34%	50%	16%	Prokon
15%	72%	13%	Glensol

Employee engagement

Our Company strives to create a workplace where employees feel engaged, passionate about their work, confident about their future, and understand and apply Nobel Oil values to help us better serve our customers. To this end, we have created an environment in which employees have the opportunity to talk about safety and other topics important for them, and to offer ideas on how to improve the workplace. Permanent feedback helps us not only to create a comfortable working environment, but also to continuously moving forward.

One of the main activities in this direction continues to be employee surveys, which gives us an idea of the degree of employee engagement and our culture. Such surveys are conducted using the annual questionnaire method, in which Company employees can share their views. This surveys include questions and track employee opinions regarding trust, work, growth, development and engagement.

An important aspect of the survey is its anonymity, which enables employees to express their opinions freely. Only in the presence of such constructive feedback can we objectively assess the situation, determine the steps to solve problems, note the successes of previously established processes and understand our employee needs to create a comfortable working environment.

Our “open door” policy is another important tool for engaging company employees. This policy allows all employees the opportunity to contact management directly, report about the problems and receive feedback on progress in the resolution of arising issues. Such meetings stimulate transparency and employee engagement, enhance their performance and provide management with the most important feedback channel, which, in turn, paves the way for up-to-date informal information about private aspects of activities directly from employees. Such an approach enables us to act on the results and take targeted actions.

In 2020, due to the COVID-19 pandemic, our time-tested communication channels became even more important than ever, as many traditional contacts and workflows were successfully moved onto online domains using modern digital solutions. Our managers have played a critical role in this communication by regularly liaising with employees to provide important information about our policies, requirements and expectations during the pandemic, and to help them cope with the rapidly changing situation. We have made every effort to maintain a high level of employee engagement, given the appearance of fundamentally new issues related to pandemic.

Development and leadership

One of the key successes in the area of sustainable development for the Company is the professionalism of its employees. Our Company implements a number of programs to develop personnel, provide employees with career development opportunities and develop the Company's talent pool.

Training and development initiatives of the Company can be one-off or meet specific business needs. Topics such as safety, environmental protection, information security, and our Code of Conduct and Business Ethics are intended for the entire organization. They are mandatory and apply to all employees of Nobel Oil and its subsidiaries.

Other training activities are carried out on the basis of annual Advance Training Plans. Depending on the characteristics of the industry, each structural subdivision of the Company draws up its own action plan to improve the skills of its employees.

During the reporting period, the Company launched a Competency Assessment process as part of our ongoing efforts to support personnel development and identify priority areas for future development. The purpose of this process is to build a common understanding of performance standards and expectations within the Company and to help to reveal any gaps in employee performance that need to be addressed through training and

development programs.

The restrictions due to COVID-19 have created many problems for employee development, personal learning and interactions. In fact, the pandemic has compelled us to think differently and turn to other solutions. This, in turn, has highlighted the importance of online learning platforms.

In 2020, the Company started working on the Digital Platform-Nexol Academy project. This project will allow us the opportunity to establish an online learning platform that we plan to use in 2021. Through the online learning platform, which will be accessible for all employees, we will be able to provide our employees with excellent opportunities to develop interpersonal skills, leadership and technical training.

In addition, in the reporting year, we continued working on the planning and succession management system. We plan to start its implementation next year. This, in turn, will enable employees to plan their career development, and identify and develop talent within the Company.

Remuneration and benefits

Our system of remuneration and motivation is aimed at ensuring competitiveness in the labor market, retaining and developing highly professional personnel, supporting the career and professional growth of our employees.

One of the Company's top priorities is to provide a system of remuneration that is transparent and clear for all employees and aligned with our principles of fairness.

In this regard, in 2019, the Company introduced a system of motivation based on an employee gradation, which ensures that remuneration systems in different organizations of the Group are uniform. The grading system we use has brought tremendous benefits to the human resource management structure and the Company as a whole due to the development of a correct salary structure, its fair distribution among permanent employees and new hires, and salary adjustment.

A fair evaluation of employee performance remains an important principle in our relationship with employees. The current Performance Management Procedure, which was updated last year, was successfully applied in the certification for 2020. This procedure allowed us the opportunity to see the problems hampering the development of employees and apply the appropriate development plans. In addition, during the new certification, the assessment of employees was based on more convenient and fair principles [not sure what this means – consider using “favorable”, “reasonable”].

Among other things, Nobel Oil offers a wide range of benefits and compensations to motivate its employees. We attach great importance to issues associated with the quality of life of our employees. Our benefits and compensation packages include voluntary health insurance, allowances for temporary disability, work accident insurance, social insurance,

financial assistance, paid leave (e.g. parental and medical), work and study grants and benefits. The benefits envisaged for permanent employees are also available for temporary and part-time employees.

In general, all Nobel Oil employees are of great value to the Company. Therefore, it is no coincidence that the Company is constantly improving, computerizing its processes and applying innovation.

Health, Safety, Environment and Quality

- Our approach
 - Our management system
 - Strengthening the safety culture
 - Health protection
 - Workforce productivity
 - Environmental Protection
 - Climate change
 - Quality management
-

Our approach

Nobel Group's vision is to be the best and fully integrated in the area of health, safety and environment, a Company creating workplaces with zero harm to people and the environment, a Company where everyone returns home safe and healthy and, therefore, protecting its employees, customers, communities and the environment in which we operate. These commitments are set out in our HSE Policy.

Our management system

The Company's HSE Policy is a key document expressing the principled commitment of Nobel Group to HSE matters. The Policy reflects fundamental obligations and uniform principles, which are followed in all our operating companies and applied to employees and everyone associated with the Company's activities.

To implement this Policy, the Company has introduced the Nobel Group HSE Management System. It contains a common set of standards and expectations to address the risks we face. This management system is based on a "Plan-Do-Check-Act" cycle.

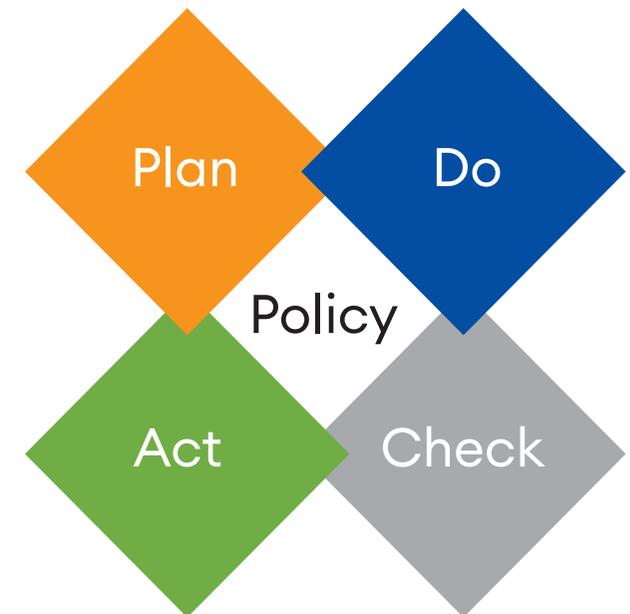
The standards of the HSE Management System develop our understanding and set the standards for our employees, who are required to plan, organize and manage our operations in such a way that we can control all HSE risks and ensure continuous improvement in the HSE performance.

Each thematic section, consisting of six main elements, establishes minimum requirements for

the entire spectrum of the Company's HSE risks. They ensure consistency and uniformity in exercising control over HSE risks regardless of location.

Our activities are conducted in accordance with the industry standard certification programs, including those for quality management (ISO 9001), environmental management (ISO 14001), health and safety management system (OHSAS18001 and ISO45001). Company procedures and guidelines are developed in line with the requirements of ISO standards and local legislation.

In 2020, we continued to prepare for the transition to a new ISO45001 standard (to supersede the previous OHSAS 18001) at our enterprises. This standard presents current requirements for the organization of the labor protection and industrial safety system, expanding the boundaries of management. In particular, the standard prescribes active interaction with employees and other stakeholders, greater responsibility in work with contractors and increased involvement of senior management. The importance of the risk-oriented approach, preventive measures and goal-setting has been strengthened.



Strengthening safety culture

Our Company makes every effort to improve the safety culture and involve employees in occupational health and safety management, and applies a risk-based approach to its daily activities. We strive to maintain and improve a high level of safety culture among employees, making them responsible for safety rules and safe behavior, as well as involving employees in risk assessment and hazard identification processes.

Using this approach, we strive to achieve a sustainable safety culture in the long term, moving from complete control of employees to their personal participation in occupational health and safety issues. In this context, the Company is making significant efforts to create a rigorous safety culture.

Reliable and safe working methods are being implemented at each of our enterprises. The Company understands that without an appropriate level of safety culture, it cannot succeed. In 2020, we made further efforts to improve the safety culture program by introducing a number of initiatives to increase employee engagement and use new safety tools and practices.

Stop Work Authority Policy

As a construction-engineering organization, the Company understands that its activities may pose many hazards to employees fulfilling their responsibilities.

The objective of Nobel Oil's "Stop Work Authority" policy is to provide employees and contractor personnel with the power and obligation to stop any work when a suspected unsafe condition or behavior could lead to an undesirable outcome. Company believes that no activity is urgent or important enough to violate environmental, safety or health standards. Employees have the right and responsibility not to perform tasks or carry out activities that, in their opinion, pose an undue risk to themselves, their colleagues or the environment. Stop work actions take precedence over all other priorities and procedures.

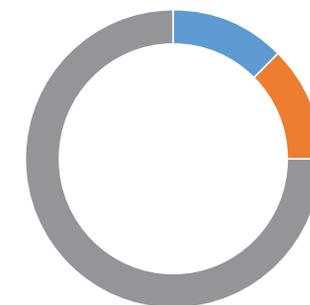
Welfare Policy

In the reporting year, the Company prepared a Welfare Policy, which recognizes that mental health problems and stress can affect anyone regardless of the employee's position, and this is an organizational problem to be addressed by senior management. This approach plays an important role in creating harmonious working relations between the management and employees, which leads to a safer work environment.

This Policy once more emphasizes our commitment to successful management of health and safety, and to creating and maintaining a positive health and safety culture throughout the organization.

Study of safety climate

In 2020, we conducted a study of the safety climate in the Company. With a total of 1,674 employees invited to take part in the study, responses were received from 975 of them (58 percent). The Safety Climate Tool measures health and safety attitudes and perceptions. The report provides an insight into the safety culture by summarizing the views and experiences of our employees. This allows us the opportunity to focus on what is absolutely important and make targeted improvements



■ Unfavourable
 ■ Neutral
 ■ Favourable

Training

Professional education and training are instrumental for informing employees and managers about the hazards and controls at the workplace so that they can work safer and more efficiently.

We organize and supervise the process of mandatory training for all employees in order to raise the culture and value of safety in everything we do.

Our HSE managers are responsible for the development and implementation of training programs to ensure that all employees have the necessary skills, training and competence to perform their assigned duties in a safe manner. Training primarily includes full-time training, retraining and advanced training programs using state-of-the-art teaching materials. These trainings, delivered in a language the listeners understand, include: HSE policy and compliance with the requirements, mechanical and technical skills, emergency preparedness and response, any mandatory certificates. The program also includes the plans for the orientation and induction on HSE issues for contractors and visitors.

If specific competencies are required for different jobs, the required skill level is indicated in the relevant working procedure. Managers are responsible for ensuring that their employees have the appropriate competence to perform work safely and in accordance with applicable legal requirements.

Example trainings offered:



Working at height



Confined space



Fire Fighting



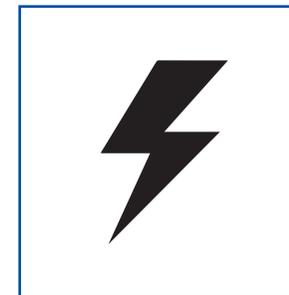
Basic First Aid



Manual handling



Driving safety
Defensive Drive



High Voltage
Certification



Electrical
safety

Health protection

As part of the measures being taken to improve working conditions, Nobel Group makes an annual assessment of working conditions with the goal of identifying harmful and hazardous factors in the working environment and labor conditions and assessing the level of their impact on the employees. Based on the results of the assessment, levels of working conditions are established and measures developed and implemented to improve working conditions for our employees.

In the reporting year, a state-accredited laboratory, in conjunction with the certification commission of the enterprise, carried out a workplace assessment (certification) in a Glensol affiliate's workshop and workplace monitoring at Prokon's HAOR (Heydar Aliyev Oil Refinery) project.

As a result of the certification and monitoring, it was established that physical parameters of the workplace at the Glensol workshop and in the HAOR project were within the limits established by legislation. The key occupational risks in terms of workers' exposure to harmful process included factors such as vibro-acoustic impacts (noise, vibrations), radiation and severity of the working process.

Workforce productivity

Correct and timely investigation of each accident allows us the opportunity to identify the causes of injuries and take corrective action to prevent similar incidents in the future, make decisions about the liability of those responsible and compensation for the damage caused to those affected.

The procedure for investigating and recording accidents at work is carried out in accordance with the Labor Code of the Republic of Azerbaijan and the internal procedure for investigating accidents, the approved corporate protocol "Report on incidents and their investigation", the purpose of which is to establish when and how an investigation should be carried out after the incident. The main goals of the internal investigation are to conduct a comprehensive review of the events preceding the incident and implement corrective action to prevent their recurrence in the future.

The accident rate in the Company remains at a lower level compared to the average indicators in the engineering-construction industry. This is due to the proactive approach we are taking to prevent safety-related accidents, which include

safety inspections, the operation of a safety management system based on international standards, training and thorough investigation of the causes of accidents.

2020 Nobel work hours

This includes direct employees, subcontractors and Joint Ventures
4,816,805 man/hours
0.12 TIR
0.17 LTIR

2020 Prokon work hours

This includes direct employees, subcontractors and Joint Ventures
4,006,498 man/hours
0.19 TIR
0.26 LTIR

2020 Glensol work hours

This includes direct employees, subcontractors and Joint Ventures
284,666 man/hours
0 TIR
0 LTIR

Environmental Protection

As a responsible Company, Nobel Oil strives to conduct its business in accordance with the principles of sustainable development, does everything possible to reduce negative impacts of its daily activities on the environment and provide innovative solutions to its customer.

Our Occupational Health, Safety and Environmental Policy sets out an approach to environmental management. The Company's environmental management system ensures the reduction of environmental risks and compliance with all regulatory requirements by the Group. Environmental management procedures outline the obligations, expectations and responsibilities of each employee and project team, as well as the actions and processes necessary to achieve the established goals and objectives for each area of the environment.

The guidelines of Nobel Oil Group's HSE management system set out the obligations, expectations and responsibilities of each employee, describe the methods used to systematically identify environmental aspects and associated impacts, assess environmental impacts, as well as the actions and processes necessary to achieve

the established goals and objectives for each area of the environment. The assessment includes detailed and phased reviews of all our new projects and operations, and the results are recorded in the register of environmental aspects of the project.

The primary objective of an environmental impact assessment is to evaluate potential direct and indirect impacts of our activities on local communities and the environment and prepare detailed plans to reduce and manage these such. When conducting impact assessments, we consult with our stakeholders such as local authorities, partners and customers throughout the life of the project to discuss any decisions and actions that need to be taken.

This approach of the Company allows us the opportunity to strictly comply with current environmental requirements. Every year, government bodies and third parties conduct external environmental audits of our operations to confirm that the Group meets environmental requirements. During the reporting period, there were no environmental incidents or fines related to the Company's activities.

To maintain a high level of environmental awareness and competence of our employees, we conduct various trainings on waste management methods, HSE practices and other topics.

In their day-to-day activities, Nobel Oil employees are required to adhere to established environmental requirements. These include procedures related to environmental control systems, as well as prohibitions on the release of any chemicals and disposal of wastes outside specifically designated areas.

Biodiversity

Nobel Oil does not cause a negative impact on biodiversity in the territories it operates. At the same time, the Company monitors the state of biodiversity at its production sites and takes appropriate action.

Our monitoring of the state of the environment shows that ecosystems in the areas around our production facilities comply with acceptable standards.

The Company's assets are not located in protected natural areas or areas of high biodiversity value. Therefore, our activities do not have a direct impact on biodiversity.

Wastes

Wastes can have a significant negative impact on the environment and human health if not handled properly.

This being the case, Nobel Oil continuously works to reduce the environmental impact of its operations by managing the use of materials and improving operational efficiency. We strive, as a minimum, to comply with all the rules related to safe and responsible waste management.

The environmental management system implemented in the Company guarantees compliance with all rules regarding safe and responsible handling of waste.

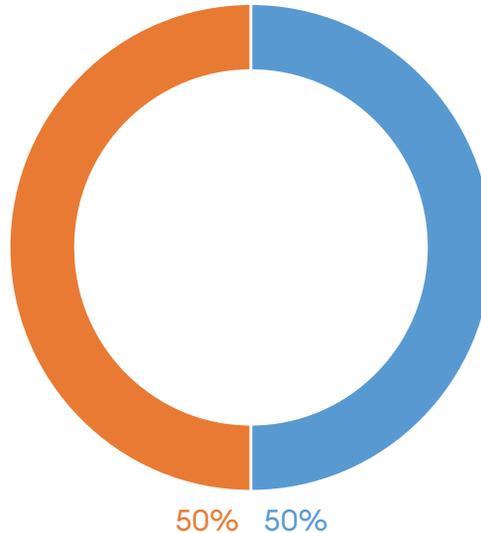
To ensure effective waste management, we monitor the entire process of collection, transportation and disposal of wastes by concluding an agreement with a qualified waste management company. Before entering into a contract, we conduct a preliminary assessment, during in which we evaluate the company's license and technological competencies.

As can be seen from the diagram, most of wastes belong to the non-hazardous or low-hazard categories. When handling hazardous wastes, we, as well as our contractors and subcontractors, use special labels for containers with

hazardous waste. The labels specify the contents, hazard characteristics, risk phrases (R phrases) and safety recommendations (S phrases) of the relevant European EEC directive.

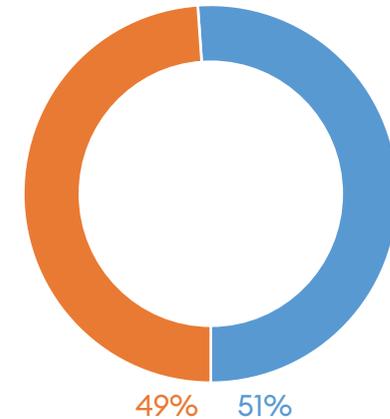
Total amount of waste, 5 195 tons

■ Hazardous ■ Non-hazardous



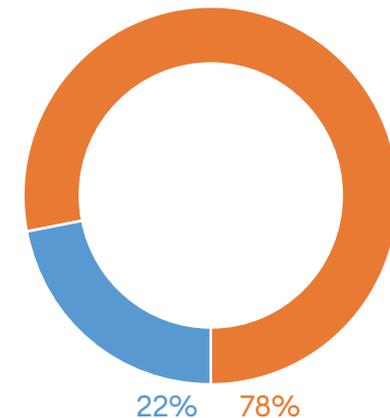
Total amount of waste at prokon, tons

■ Hazardous ■ Non-hazardous



Total amount of waste at glensol, tons

■ Hazardous ■ Non-hazardous



Water

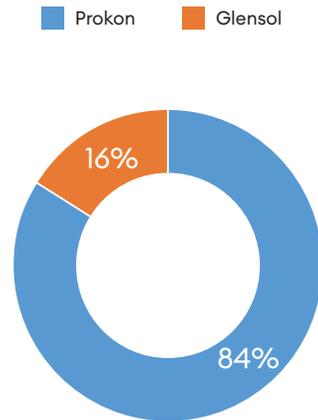
We understand that global population growth and climate change are affecting the distribution and availability of water. We at Nobel Oil are committed to further developing our approach to management of water resources.

Our ability to monitor and report our own water use depends on the location of our office. At our facilities, we carefully monitor water consumption. Monthly reports on water consumption are prepared so that research can be tracked. In the case of rented offices, we do not directly pay water bills and do not manage the process, so it is difficult to track consumption, ensure conservation of water or quantify the results of our conservation efforts. Even then, however, we encourage our employees to use water efficiently.

At our managed facilities, as well as the sites of our customer, the aspects of water conservation and protection are part of our environmental assessment in accordance with Nobel Oil Group's HSE management system.

We follow strict environmental regulations to ensure that our operations do not endanger local surface or groundwater. We ensure a high quality of discharged process water through the use of settling ponds.

Water consumption, 4 827 thsd cbm



Climate change

In 2019, the Intergovernmental Panel of UN experts on climate change published a "Special Report on Climate Change and Land Use". The report contains a warning that climate change will affect biodiversity, human health and food systems to the point where some regions will be facing crises of unprecedented scale.

This shows again how important the Paris Climate Agreement, signed in 2015, is to stepping up the response of the international community to the threat of climate change by keeping the increase in global average temperature well below 2°C above the pre-industrial levels.

As a service company, we are aware of our role in the development of a low carbon economy. We understand that we have a unique opportunity to support our business partners working together to stand against the climate change by providing innovative technology solutions and services.

In addition, we recognize that besides provision of services to our customers, we must also pay attention to our own actions to reduce the environmental impact. As such, we strive to reduce our carbon footprint by enhancing the efficiency of Company operations.

Our main sources of greenhouse gas emissions are associated mainly with the consumption of electricity and fuel that we use in our offices and facilities.

In this respect, considering that the world is committed to more sustainable energy solutions, the way we consume energy and ultimately save resources has never been more important. Therefore, we understand the importance of continuous improvement of the energy efficiency through the measures we are implementing in our business.

Our carbon footprint

How we implement and report our carbon footprint within the framework of our business is critical to the realization of our carbon reduction ambition. The Company adheres to the standards of the Greenhouse Gas Emissions Protocol in respect of inventory, within which we carry out real-time monitoring of emissions. The base unit of measurement used in the inventory of GHG emissions is metric tons of carbon dioxide equivalent.

It is evident from the diagram that the bulk of GHG emissions comes from the use of electric energy and fuel in our activities.

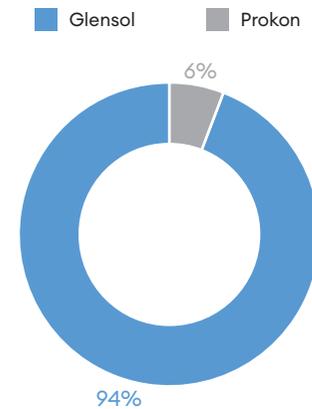
As a service company, we cannot measure the actual electricity consumption in rented offices and field operations, because the electric energy there is consumed and monitored by our customers.

In 2020, the volumes of GHG emissions as a result of the Company's activities amounted to 2,463.4 thousand tons of CO₂ equivalent, of which 2,312.0 thousand tons of CO₂ equivalent accounted for direct emissions of greenhouse gases and 151.4 thousand tons of CO₂ equivalent for indirect emissions associated with the

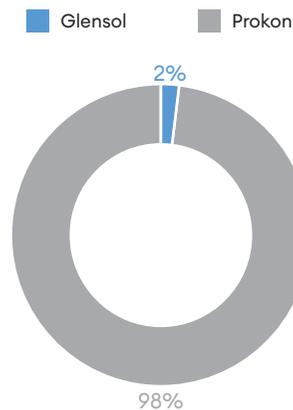
purchase of electricity. The exponential growth of absolute values of GHG emissions in 2020 comparing to 2019 is related to increased scope of work of Prokon on the HAOR project and to the opening of a new Glensol workshop.

Thus, the volume of fuel consumed in 2020 amounted to 2,134,558 tons, or 99 percent more than in 2019. The volume of consumed electric energy during the year amounted to 266,882 kWh, or 98 percent more than in 2019.

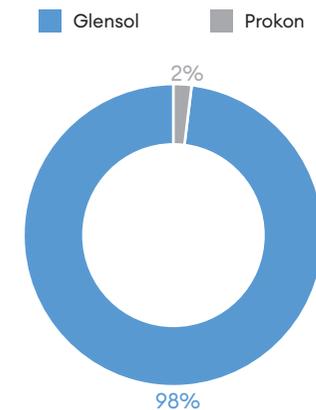
Emissions per scope, 2,463.3 thousand tons of CO₂ equivalent



Fuel consumption, 2,143.5 thousand tons



Electricity consumption, 177,408 thousand kWh



Quality management

The Company realizes that a responsible attitude to high-quality service provision is critical to building long-term relationships with its customers.

We strive to build trusting and long-term relationships with our customers by providing high-quality products and services. Our Code of Conduct and Business Ethics sets rigorous standards for our employees interacting with the customers and ensures the highest quality of service.

As part of the development of Nobel Oil's quality management system, our subsidiary Glensol introduced and certified a Quality Management System that meets the requirements of ISO 9001: 2015 international standard. It is based on the "Plan - Do - Check - Act" approach. Glensol QMS and internal procedures are aligned with API Q1/Q2 requirements, which allows us the opportunity to provide our services in compliance with API Q1/Q2 standards without formal API Q1/Q2 certifications.

We do not see a need for having formal API Q1/Q2 certifications as there is no market or customer requirement for this certification. It is not required by the scope of our services either.

Numerous procedures and guidelines underpin our quality management system, ranging from internal audit to training, monitoring of efficiency to the management review process, incident investigation to reporting, quality measurement with specific targets for continual improvement to routine risk assessments.

A commitment to a culture of quality in the Company is based on regular training, clear communication, appreciation for excellent results, management of KPIs and goals.

Customer satisfaction surveys

Customer satisfaction with products and services is achieved not only through quality, but also through various needs of our customers being met.

We manage all emerging shortcomings, collect customer complaints, maintain communication throughout the service process and measure customer satisfaction on an annual basis.

Our subsidiary Glensol conducts regular customer satisfaction surveys to increase the efficiency of our business and maximize customer satisfaction. With this aim, the Company keeps a register of complaints and positive feedback, and records all opinions.

Sustainable Supply Chain

- Supply chain management
- Tender procedures
- Procurement results

Supply chain management

Thanks to responsible and effective supply chain management, Nobel Oil ensures business continuity and supports the sustainable functioning of the entire value chain. We strongly believe that responsible purchasing can improve our reputation and attractiveness as an employer, and ultimately enhance our competitiveness.

As a service company providing services in the field of construction and engineering, Nobel Oil purchases a significant amount of goods, works and services every year, and interacts with a large number of suppliers and contractors from different sectors of the economy. This is evidenced by our consolidated P&L statement, in which the cost of materials and services accounts for almost half of the Company's revenues. This not only testifies to the significant importance of procurement for Company operations, but also shows the Company's ability to influence sustainable development in the supply chain. Therefore, we recognize the proactive role our partners in supply chain play in achieving our sustainability goals and the importance of our shared commitment and understanding of our approach to doing business.

The supply chain management system at Nobel Oil is a complex process consisting of interrelated elements: production demand planning, inventory management, procurement planning, supplier qualifications, supplier

selection, commitment management and control.

Depending on the specifics of our activity, the Company uses a supplier management system, which consists of several procedures governing the participation of suppliers, their selection and our subsequent work with them. The choice of suppliers of goods, works and services is regulated in line with the national legislation and internal regulations and standards. The main document governing procurement activities at Nobel Oil is the Commercial Review and Procurement procedure.

One of the main internal documents that has a significant impact on our supply chain is our Code of Conduct and Business Ethics, which sets out obligations to comply with environmentally sound business practices, fair competition and respect for data protection, protect intellectual property and comply with foreign trade laws, as well as the prohibition of corruption, bribery and money laundering.

When dealing with the candidates, considerable attention is paid to the issues of safety and environmental protection. Compliance with fundamental safety and environmental standards throughout the supply chain is the only way to secure the trust needed for a long-term business relationship and is therefore a top priority for the Company.

The Company explicitly demands from its business partners to apply the values and requirements set out in our Code of Conduct and Business Ethics in all material respects. When the Company becomes aware of violations of the

Code of Conduct and Business Ethics, it notifies the relevant supplier accordingly and expects the supplier to investigate and resolve any such non-compliance issues as quickly as possible and within the agreed timeframe. If the supplier is unwilling to eliminate such problems, the Company reserves the right to take legal steps – from demanding that corrective action be taken to complete termination of the business relationship.

To ensure compliance with our values and requirements, the Company has implemented a supplier pre-qualification procedure. This procedure describes the sequence of operations for supplier verification and provides a detailed description of each phase of the process. The supplier verification process takes place on the basis of internal and external questionnaires sent by procurement managers during the pre-selection or at the bidding stage.

In the reporting year, the Company continued the process of digitizing internal PSMC processes by transferring approval and verification to Enterprise Resource Planning tools and Document Management system. This process was successfully completed by Nobel Oil and its subsidiary Glensol. In our subsidiary Prokon, we plan to complete a similar process in 2021. These steps allow us the opportunity to promptly respond to changes in demand and ensure the transparency and accountability of the supply chain.

Tender procedures

The Group follows Nobel Oil Services UK PSCM Handbook and Procurement procedure(s) for tender processing. All procurement selections take place only after a competitive bidding process. The only exceptions are the sourcing where a supplier is the sole or single source.

The Group manages its tender processes within the framework of SOD thresholds, where relevant approval flows are listed. Any Company purchase to the tune of 500/1000 AZN (USD) require competitive bidding with a minimum of three offers.

Purchases worth 50,000/100,000 go in sealed bids, where the corporate office validates the results as per the SOD thresholds mentioned above.

Requests for Proposal (RFP) are sent to all Vendors with an equal opportunity to win the business.

Bid evaluations are based on several criteria:

- Compliance with all RFP requirements
- Commercial aspects
- Quality / Technically best offer
- Best delivery

Assessments are performed by a project team, which includes representatives of the requesting and procurement departments. The commercial and technical bid evaluation is then validated as per the set thresholds. The approvers on corporate level are the CCO and the CEO.

After the completion of bidding, PSCM keeps all data available for compliance tracking and audit checks, which are performed on a quarterly and annual basis.

The Group is currently reviewing an e-sourcing tool, the implementation of which will rule out any informal communication with suppliers and manage each bidding/tender through a centralized online tool that ensures communication transparency throughout the cycle.

Procurement results

When making purchases, Nobel Oil gives preference to domestic products if they meet technical requirements and their cost does not exceed the cost of imported analogues. As a result, the Company shortens supply routes and makes them more sustainable, while indirectly supporting the local economy.

The events related to the COVID-19 pandemic have not had a significant impact on the functioning of our supply chains. However, in a number of cases, the Company faced problems related to delays, increased costs due to preventive and protective measures, as well as the restructuring of partner/supplier companies.

In the light of the said problems in the reporting period, Nobel Oil Group revised, rechecked and its adopted business processes so that the Company could respond quickly and not

encounter major problems.

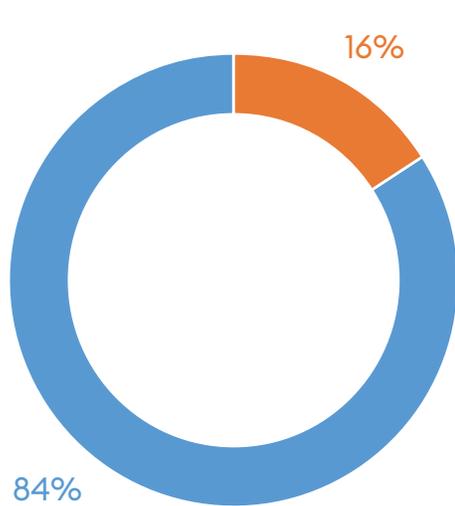
During the reporting period, our suppliers and contractors mainly provided engineering equipment, finished products, as well as construction services to the Company.

In 2020, Nobel Oil, as well as its Glensol and Prokon subsidiaries, purchased goods and services in the amount of 110.9 million AZN, most of which (87 percent of the total amount) was purchased from companies registered in the local market

% of Vendor diversity in 2020

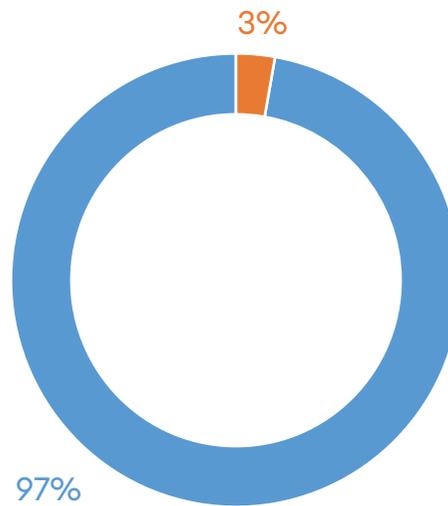
Prokon

Local Abroad



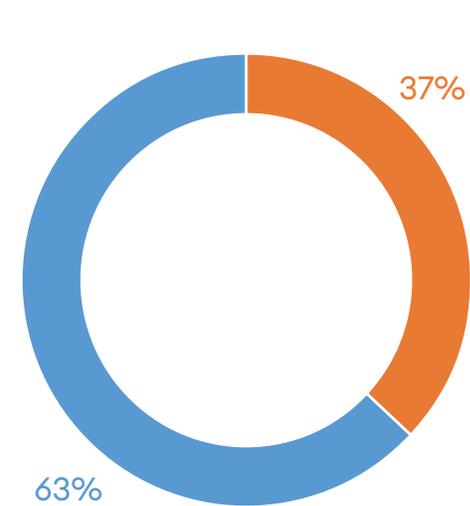
Nobel Oil

Local Abroad



Glensol

Local Abroad



Appendices

- Data summary
- GRI
- Contact information

Financial Performance

Total Revenue, Nobel Group (USD `000)

Nobel Oil Group	2018	2019	2020
		382,82	234,0

Revenue in business

Business	2018	2019	2020
Construction	341,5	184,9	223,400
Rental income	0,02	0,1	6,703
Provision of service	12,7	27,8	24,522
Sale of goods and other revenue	28,6	21,2	23,3

Key Staff Figures

Number of Nobel Oil Group employees

Company	2018		2019		2020	
	Men	Women	Men	Women	Men	Women
Nobel Oil	32	12	38	16	42	15
Prokon	337	26	443	46	1105	77
Glenzol	60	13	84	14	107	18
Total	480		641		1364	

Total number of employees in 2020, by gender and employee category

Employee category	Nobel Oil		Prokon		Glensol	
	Men	Women	Men	Women	Men	Women
Executive	18	3	2	0	8	4
Specialist	15	11	221	37	68	13
Technician	0	0	818	21	22	0
Manual labor	9	1	64	19	9	1

Total number of employees by employment contract (permanent and temporary) and gender

Company	Contract	2018		2019		2020	
		Men	Women	Men	Women	Men	Women
Nobel Oil	Permanent	28	12	37	12	42	15
	Temporary	4	0	1	4	0	0
Prokon	Permanent	13	2	15	4	5	2
	Temporary	324	24	428	42	1100	75
Glensol	Permanent	60	13	84	14	99	18
	Temporary	0	0	0	0	8	0

Staff Turnover

Company	Total employee number	2018	2019	2020
Nobel Oil	Hired	22	27	22
	Dismissed	21	18	14
	Staff turnover	52,50%	40,45%	26,42%
Prokon	Hired	330	456	1028
	Dismissed	833	113	350
	Staff turnover	21%	26%	34,06%
Glensol	Hired	44	46	31
	Dismissed	11	22	9
	Staff turnover	21,15%	26,04%	7,56%

Number of new hires by gender in 2020

Nobel Oil		Prokon		Glensol	
Men	Women	Men	Women	Men	Women
10	12	982	46	27	4

Number of dismissals by gender in 2020

Nobel Oil		Prokon		Glensol	
Men	Women	Men	Women	Men	Women
7	7	332	18	9	0

Number of new hires by age

Nobel Oil			Prokon			Glensol		
below 30	between 30-50	over 50	below 30	between 30-50	over 50	below 30	between 30-50	over 50
15	5	2	429	397	202	8	21	2

Number of new hires by age

Nobel Oil			Prokon			Glensol		
below 30	between 30-50	over 50	below 30	between 30-50	over 50	below 30	between 30-50	over 50
5	8	1	78	215	57	2	6	1

Health and Safety

OHS performance indicators

Company	Category	2018	2019	2020
Nobel Oil	TIR	0	0	0,12
	LTIR	0	0	0,17
Prokon	TIR	0	0,35	0,19
	LTIR	0	0,12	0,26
Glensol	TIR	0	0,80	0
	LTIR	0	0	0

Environment

Greenhouse gas emissions at Nobel Oil Group, thousand tons in CO₂ equivalent

Emissions	2018	2019	2020
Direct	75.8	1602.3	2312.0
Indirect	64.8	96.88	151.4
Total	140.6	1699.1	2463.4

Energy consumption at Nobel Oil Group

Energy	2018	2019	2020
Electricity, thousand kWh	2474	2963	177408
Fuel, ton	30.6	635.8	2143

Water consumption at Nobel Oil Group

	2018	2019	2020
Water consumption, thousand tons	0.96	10.7	4.82

Total amount of waste at Nobel Oil Group, tons

Waste	2018	2019	2020
Hazardous	42	1020	2584
Non-hazardous	97	1206	2611

Supply chain

Share of local suppliers, %

Company	2018	2019	2020
Nobel Oil	96%	83%	97%
Prokon	92.8%	70%	84%
Glensol	94.8%	85.9%	63%

GRI

GRI standards and indicators	Notes	Report Section/Page
GRI 102: GENERAL DISCLOSURES		
Organizational profile		
102-1 Name of the organization		
102-2 Activities, brands, products, and services		
102-3 Location of headquarters		
102-4 Location of operations		
102-5 Ownership and legal form		
102-6 Markets served		
102-7 Scale of the organization		
102-8 Information on employees and other workers		
102-9 Supply chain		
102-10 Significant changes to the organization and its supply chain		
102-11 Precautionary Principle or approach		
Strategy		

102-14 Statement from senior decision-maker		
102-15 Key impacts, risks, and opportunities		
Ethics and integrity		
102-16 Values, principles, standards and norms of behavior		
102-17 Mechanisms for advice and concerns about ethics		
Governance		
102-18 Governance structure		
102-19 Delegating authority		
102-20 Executive level responsibility for economic, environmental, and social topics		
102-21 Consulting stakeholders on economic, environmental, and social topics		
102-22 Composition of the highest governance body and its committees		
102-23 Chair of the highest governance body		
102-24 Nominating and selecting the highest governance body		

102-25 Conflicts of interest		
102-26 Role of the highest governance body in setting purpose, value, and strategy		
102-27 Collective knowledge of highest governance body		
102-28 Evaluating the highest governance body's performance		
102-29 Identifying and managing economic, environmental, and social impact		
102-30 Effectiveness of risk management processes		
102-31 Review of economic, environmental, and social topics		
102-32 Highest governance body's role in sustainability reporting		
102-33 Communicating critical concerns		
102-35 Remuneration policies		
Stakeholder engagement		
102-40 List of stakeholder groups		
102-41 Collective bargaining agreements		

102-42 Identifying and selecting stakeholders		
102-43 Approach to stakeholder engagement		
102-44 Key topics and concerns raised		
Reporting practice		
102-45 Entities included in the consolidated financial statements		
102-46 Defining report content and topic Boundaries		
102-47 List of material topics		
102-48 Restatements of information		
102-49 Changes in reporting		
102-50 Reporting period		
102-51 Date of most recent report		
102-52 Reporting cycle		
102-53 Contact point for questions regarding the report		
102-54 Claims of reporting in accordance with GRI Standards		
102-55 GRI content index		

102-56 External assurance		
GRI 103: MANAGEMENT APPROACH		
103-1 Explanation of the material topic and its Boundary		
103-2 The management approach and its components		
103-3 Evaluation of the management approach		
GRI 201: ECONOMIC PERFORMANCE		
201-1 Direct economic value generated and distributed		
201-3 Defined benefit plan obligations and other retirement plans		
201-4 Financial assistance received from the government		
GRI 202: MARKET PRESENCE		
202-1 Ratios of standard entry level wage by gender compared to local minimum wage		
202-2 Proportion of senior management hired from the local community		
GRI 203: INDIRECT ECONOMIC IMPACTS		

203-1 Infrastructure investments and services supported		
203-2 Significant indirect economic impacts		
GRI 204: PROCUREMENT PRACTICES		
204-1 Proportion of spending on local suppliers		
GRI 205: ANTI-CORRUPTION		
205-1 Operations assessed for risks related to corruption		
205-2 Communication and training about anticorruption policies and procedures		
205-3 Confirmed incidents of corruption and actions taken		
GRI 206: ANTI-COMPETITIVE BEHAVIOR		
206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices		
GRI 302: ENERGY		
302-1 Energy consumption with in the organization		
302-2 Energy consumption outside of the organization		
302-4 Reduction of energy consumption		

GRI 303: WATER		
303-1 Water withdrawal by source		
303-2 Water sources significantly affected by withdrawal of water		
303-3 Water recycled and reused		
GRI 304: BIODIVERSITY		
304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas		
GRI 305: EMISSIONS		
305-1 Direct (Scope 1) GHG emissions		
305-2 Energy indirect (Scope 2) GHG emissions		
305-5 Reduction of GHG emissions		
GRI 306: EFFLUENTS AND WASTE		
306-1 Water discharge by quality and destination		
306-2 Waste by type and disposal method		
306-3 Significant spills		
306-4 Transport of hazardous waste		

306-5 Water bodies affected by water discharges and/or runoff		
GRI 307: ENVIRONMENTAL COMPLIANCE		
307-1 Non-compliance with environmental laws and regulations		
GRI 308: SUPPLIER ENVIRONMENTAL ASSESSMENT		
308-1 New suppliers that were screened using environmental criteria		
GRI 401: EMPLOYMENT		
401-1 New employee hires and employee turnover		
401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees		
GRI 402: LABOR/ MANAGEMENT RELATIONS		
402-1 Minimum notice periods regarding operational changes		
GRI 403: OCCUPATIONAL HEALTH AND SAFETY		
403-1 Workers representation in formal joint management worker health and safety committees		

403-2 Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work related fatalities		
403-3 Workers with high incidence or high risk of diseases related to their occupation		
GRI 404: TRAINING AND EDUCATION		
404-1 Average hours of training per year per employee		
404-2 Programs for upgrading employee skills and transition assistance programs		
404-3 Percentage of employees receiving regular performance and career development reviews		
GRI 405: DIVERSITY AND EQUAL OPPORTUNITY		
405-1 Diversity of governance bodies and employees		
GRI 406: NON-DISCRIMINATION		
406-1 Incidents of discrimination and corrective actions taken		
GRI 407: FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING		

407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk		
GRI 408: CHILD LABOR		
408-1 Operations and suppliers at significant risk for incidents of child labor		
GRI 409: FORCED OR COMPULSORY LABOR		
409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor		
GRI 411: RIGHTS OF INDIGENOUS PEOPLES		
411-1 Incidents of violations involving rights of indigenous peoples		
GRI 413: LOCAL COMMUNITIES		
413-1 Operations with local community engagement, impact assessments, and development programs		
413-2 Operations with significant actual and potential negative impacts on local communities		

GRI 414: SUPPLIER SOCIAL ASSESSMENT		
414-1 New suppliers that were screened using social criteria		
414-2 Negative social impacts in the supply chain and actions taken		
GRI 415: PUBLIC POLICY		
415-1 Political contributions		
GRI 416: CUSTOMER HEALTH AND SAFETY		
416-1 Assessment of the health and safety impacts of product and service categories		
416-2 Incidents of noncompliance concerning the health and safety impacts of products and services		
GRI 418: CUSTOMER PRIVACY		
418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data		
GRI 419: SOCIOECONOMIC COMPLIANCE		
419-1 Non-compliance with laws and regulations in the social and economic area		