SUSTAINABILITY REPORT

2025



NATIONAL REFINERY LIMITED

EXECUTIVE SUMMARY

This Sustainability Report presents National Refinery Limited (NRL)'s Environmental, Social, and Governance (ESG) performance for 1 July 2024 – 30 June 2025 (financial data) and 1 January – 31 December 2025 (social and environmental data). The report underscores NRL's commitment to responsible operations, regulatory compliance, transparency, and long-term value creation in line with SECP Sustainability Guidelines, ISO 14001 and ISO 45001.

As Pakistan's leading oil refining and petrochemical complex, NRL integrates sustainability into its corporate strategy, risk management, and decision-making, with oversight from the Board and executive leadership. During the reporting year, NRL strengthened ESG governance, enhanced risk management systems, and advanced key sustainability priorities. Environmental efforts focused on GHG emission reduction, energy efficiency, flaring control, water conservation, effluent compliance, hazardous waste management, and biodiversity protection. Environmental monitoring ensured full regulatory compliance and alignment with SEQS standards.

Health, Safety, and Environment (HSE) remained central. NRL prioritized process safety, contractor safety, emergency preparedness, and workforce training, while monitoring Potential incidents, near-misses, accidents and LOPC events to support proactive risk management. Social initiatives emphasized employee development, workforce capability, diversity, well-being, and human rights, complemented by community engagement through healthcare camps, blood donation drives, education partnerships, plantation drives, and social welfare visits.

Governance underpins all ESG efforts. NRL maintained strong internal controls, anti-corruption policies, whistleblowing mechanisms, and regulatory compliance systems, with ESG materiality assessment guiding priority areas: occupational health and safety, regulatory compliance, GHG emissions, energy efficiency, and climate-related risks.

Looking ahead to 2025–2030, NRL has set clear targets for zero-fatality workplace ambition, renewable energy adoption, asset integrity, and digitalization. Through structured governance, measurable KPIs, stakeholder engagement, and continuous improvement, NRL aims to deliver sustainable long-term value for shareholders, employees, communities, and the nation, while supporting national energy security and advancing an environmentally responsible future.

ABOUT THIS REPORT

We are pleased to present the National Refinery Limited (NRL) Annual Sustainability Report – 2025, highlighting our progress and achievements on the sustainability journey during the year.

Scope:
This Sustainability Report provides a comprehensive and transparent account of NRL's non-financial performance, demonstrating our commitment to responsible business practices, good governance, and stakeholder accountability.

The report covers the company's key Environmental, Social, and Governance (ESG) aspects, including:

- Environmental Stewardship: Energy management, emissions reduction, waste management, water stewardship, and climate resilience initiatives.
- Social Responsibility: Employee health and safety, workforce development, diversity and inclusion, community engagement, and social investment programs.
- Governance and Ethics: Corporate governance, risk management, compliance, ethical conduct, and transparency in decision-making.

The report also details the methodology used to identify and evaluate stakeholder needs and expectations, and how these inputs are transformed into actionable strategies and initiatives. It serves as a strategic communication tool for all stakeholders, reflecting NRL's long-term commitment to sustainability and value creation.

The disclosures in this report are aligned with SECP ESG disclosure guidelines, the Code of Corporate Governance Regulations, and reference globally recognized sustainability reporting practices to ensure comprehensive and comparable reporting.

Reporting Period:
The reporting period for this Sustainability Report is as follows:

- Social and Environmental Data: 1st January 2025 – 31st December 2025
- Financial Data: 1st July 2024 – 30th June 2025

The report integrates information from the most recently published Annual Report and other internal sources, ensuring consistency, accuracy, and reliability of the data.

The reporting approach provides a holistic view of NRL's performance, combining operational, social, environmental, and financial perspectives. This enables stakeholders to evaluate progress against sustainability objectives, assess ESG-related risks and opportunities, and understand the company's contribution toward national and global sustainability goals.

Report Audience:
This Sustainability Report is prepared to provide transparent and comprehensive information to all stakeholders with an interest in NRL's ESG performance, sustainability initiatives, and operational practices.

ECONOMIC PERFORMANCE
(FINANCE, PEOPLE & CULTURE, HSE & TECHNICAL)

Financial Highlights 2025

Net Sales [1]	Gross Profits / Loss [1]	Operating Profits / Loss [1]
307,663	(6,234)	(7,696)

Shareholder's Equity (%)	Total Sales [1]	Throughput Volumes [2]
50,316	1,612,414	1,704,885

1. Rupees in Million
2. Million Tons

Non - Financial Highlights 2025

Employee & HR Statistics

Number of Employee

905

Training Session conducted (Nos.)

700

Water Utilization

Water withdrawal cubic meter (m^3)

1736960

Water Recycled cubic meter (m^3)

638,001

Percentage of water saved by Recycling (%)

37%

Environment

SEQs Compliance (%)

100

Total Renewal Energy Generation Capacity (kWh)

250

Health & Safety

Total Recordable Incident (Nos.)

4

Emergency Readiness Rehearsal (Nos.)

100+

Work related Fatal Injury

NIL

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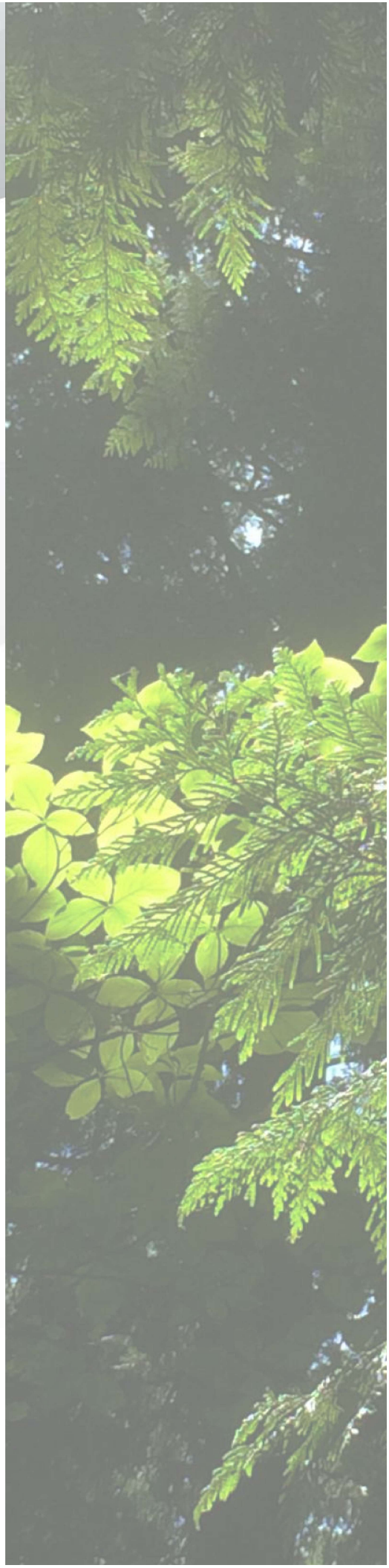
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NRL AT A GLANCE

FIRST LUBE REFINERY

BEFORE RE-VAMP

Design capacity	3,976,500 barrels per year of Crude Oil processing
Design capacity	533,400 barrels per year of Lube Base Oils
Date Commissioned	June 1966
Project Cost	Rs. 103.9 million

AFTER RE-VAMP

Design capacity	5,610,000 barrels per year of Crude Oil processing
Design capacity	568,860 barrels per year of Lube Base Oils
Date Commissioned	September 2020
Project Cost of Revamping	Rs. 1,562 million

FUEL REFINERY

BEFORE RE-VAMP

Design capacity	11,385,000 barrels per year of Crude Oil processing
Date Commissioned	April 1977
Project Cost	Rs. 607.5 million

AFTER FIRST RE-VAMP

Design capacity	16,500,000 barrels per year of Crude Oil processing
Date Commissioned	February 1990
Project Cost of Revamping	Rs. 125.0 million

AFTER SECOND RE-VAMP

Design capacity	17,490,000 barrels per year of Crude Oil processing
Date Commissioned	March 2017
Project Cost of Revamping	Rs. 548.0 million

HSD DESULPHURIZATION AND ASSOCIATEDUNITS

Date Commissioned	June 2017
Project Cost	Rs. 26.82 billion

NAPHTHA BLOCK (ISOMERIZATION UNIT)

Date Commissioned	October 2017
Project Cost	Rs. 6.54 billion

BTX UNIT

Design capacity	180,000 barrels per year of BTX
Date Commissioned	April 1979
Project Cost	Rs. 66.7 million

SECOND LUBE REFINERY

BEFORE RE-VAMP

Design capacity	700,000 barrels per year of Lube Base Oils
Date Commissioned	January 1985
Project Cost	Rs. 2,082.4 million

AFTER RE-VAMP

Design capacity	805,000 barrels per year of Lube Base Oils
Date Commissioned	June 2007
Project Cost of Revamping	Rs. 585.0 million

SHAREHOLDERS' EQUITY

June 1966	Rs. 20.0 million
June 2025	Rs. 50,316.4 million

MESSAGE FROM CEO



Sustainability is a core pillar of NRL's business philosophy and long-term strategy. As one of the nation's leading oil refineries, we recognize that our responsibilities extend well beyond the production of high-quality fuels. They encompass the protection of the environment, the safety and well-being of our people, ethical business conduct, and the creation of lasting value for all stakeholders.

During the reporting year, NRL made tangible progress across key sustainability priorities. We continued to strengthen our health, safety, and environmental performance, with focused initiatives aimed at reducing emissions, improving energy efficiency, enhancing process safety, and minimizing environmental impact across our operations. Our commitment to operational integrity remains unwavering, supported by robust risk management systems, asset reliability programs, and continuous workforce capability development.

We also advanced our climate resilience and sustainability roadmap in alignment with recognized frameworks and regulatory expectations, including SECP guidelines and applicable sustainability reporting standards. Through targeted investments, digitalization, and operational optimization, we are improving resource efficiency, reducing our carbon intensity, and embedding sustainability considerations into decision-making at all levels of the organization.

NRL remains equally committed to strong corporate governance, transparency, and ethical conduct. We continue to reinforce governance structures, compliance mechanisms, and stakeholder engagement processes to ensure accountability and trust. Our social responsibility initiatives focus on employee well-being, diversity and inclusion, skills development, and meaningful engagement with the communities in which we operate.

We acknowledge that the global energy landscape is evolving rapidly. While challenges remain, we view this transition as an opportunity to adapt, and responsibly evolve our business. NRL is committed to supporting the nation's energy security while progressively moving toward a more efficient, resilient, and lower-carbon future.

I would like to express my sincere appreciation to our employees for their dedication, to our partners for their collaboration, and to our stakeholders and communities for their continued trust and support. Together, guided by integrity, innovation, and responsibility, we will continue to build a sustainable and resilient NRL for generations to come.

CHIEF EXECUTIVE OFFICER

OUR HISTORY

1963- Established as a Public Limited Company.

1966- Refinery came into production with a refining capacity of 0.55 million tons per annum by commissioning of 1st Lube Refinery.

1977- The Fuel Refinery was commissioned with a refining capacity of 1.5 million tons per annum.

1979- Petrochemical BTX plant installed, capable of producing 25,000 tons of Benzene, Toluene and Xylene.

1985- Commissioning of 2nd Lube Base Oil Refinery

1990- Fuel Refinery was revamped and its refining capacity increased to 2.1 million tons per annum.

2005- Privatization of NRL. 51% shares acquired by Attock Group of Companies.

2017- Value added Project Plants commissioned - DHT, HPU, SRU and Isomerization Unit.

TODAY- Crude Processing designed capacity 3.05 million tons/year. Lube Based Oil Production designed capacity 192,000 tons.

VISION

Our passion is to attain distinctive leadership amongst the corporate success stories of tomorrow. We at NRL recognize that realization of this passion needs superior professional competencies, continuous value addition and improvising, development of human capital and complete commitment to safety, occupational health and environment

MISSION

1. To remain the premium and preferred supply source for various petroleum products and petrochemicals.
2. Offer products that are not only viable in terms of desirability and price but most importantly give true and lasting value to our customers.
3. Deliver strong returns on existing and projected investments of our stakeholders by use of specialised and high quality corporate capabilities.
4. Business development by adoption of emerging technologies, growth in professional competence, support to innovation, enrichment of human resource and performance recognition.
5. Be a responsible corporate citizen by serving the community through a variety of socio-economic acts and maintaining a high level of safety, occupational health and environmental care.

CORE VALUES

1. ETHICAL CONDUCT AND INTEGRITY

We value lifestyle in our organization where ethics like truth, honesty, integrity and fair play are basic ingredients while interacting within the organization or dealing with the outside world.

2. TEAMWORK AND RESPONSIBILITY

We share information and resources and step in to help out other team members. Conflicts are worked out in spite of obstacles and difficulties. We accept responsibility with “can do” attitude.

3. CUSTOMER SATISFACTION

We endeavor to provide quality products to our customers at competitive prices. We value their satisfaction essential for continued growth of our business.

CORE VALUES

4. CONTINUOUS IMPROVEMENT

We generate new ideas and creative approaches to upgrade and update our refinery to best available technology and processes so that our products are at the level of internationally accepted standards.

5. PROFITABILITY

We believe in enhancing our profitability to the maximum so that Employees, Shareholders and Government all benefit from it.

6. CORPORATE CITIZENSHIP

As a good Corporate Citizen, we are more than willing and happy to meet our social responsibilities towards the community around us. We are also committed to meet requirements of health, safety and environment.

CORPORATE INFORMATION

Board of Directors

Laith G. Pharaon
Alternate Director: Sajid Nawaz
Wael G. Pharaon
Alternate Director: Babar Bashir Nawaz
Shuaib A. Malik - Chairman
Abdus Sattar
Shamim Ahmad Khan
Tariq Iqbal Khan
Khondamir Nusratkhujaev

Chief Executive Officer

Asad Hasan

Chief Financial Officer

Nouman Ahmed Usmani

Company Secretary

Badruddin Khan

Audit Committee

Shamim Ahmad Khan	Chairman
Abdus Sattar	Member
Babar Bashir Nawaz Alternate Director for Mr. Wael G. Pharaon	Member
Muhammad Atta ur Rehman Malik	Secretary

Human Resource and Remuneration (HR&R) Committee

Shamim Ahmad Khan	Chairman
Shuaib A. Malik	Member
Babar Bashir Nawaz Alternate Director for Mr. Wael G. Pharaon	Member
Asad Hasan	Member
Nouman Ahmed Usmani	Secretary

ESG Sustainability Committee

Raghib Nooruddin	Chairman
Ms. Mona Faisal	Member
Nouman Ahmed Usmani	Member
Nisar Ahmed Khan	Member
Ali Raza Bodla	Member
Syed Mustafa Hussain	Secretary

CORPORATE INFORMATION

Auditors
A. F. Ferguson & Co.
Chartered Accountants

Legal Advisor
Ali Sibtain Fazli & Associates
Legal Advisors, Advocates & Solicitors

Bankers
The Bank of Punjab
MCB Bank Limited
Faysal Bank Limited
Meezan Bank Limited
National Bank of Pakistan
Allied Bank Limited
Habib Bank Limited
Habib Metropolitan Bank Limited
MCB Islamic Bank Limited
Dubai Islamic Bank
Bank AL-Habib Limited
Samba Bank Limited
Bank Alfalah Limited
United Bank Limited
Askari Bank Limited
BankIslami Pakistan Limited
Industrial & Commercial Bank of China Limited

Registered Office
7-B, Korangi Industrial Area, Karachi-74900
P.O. Box: 8228, Karachi-74900
UAN: +92-21-111-675-675
PABX: +92-21-35064981-86
+92-21-35064977-79
Website: www.nrlpak.com
E-mail: info@nrlpak.com

Share Registrar
CDC Share Registrar Services Limited
CDC House, 99-B, Block 'B', S.M.C.H.S.,
Main Shahra-e-Faisal, Karachi – 74400.
Tel: (Toll Free) 0800-23275
Fax: +92-21-34326053
Email: info@cdcsrsl.com
Website: www.cdcsrsl.com

CORPORATE OBJECTIVES & DEVELOPMENT STRATEGY

National Refinery Limited is a petroleum refining and petrochemical complex engaged in manufacturing and supplying a wide range of fuel products, lubes, BTX, asphalts and specialty products for domestic consumption and export.

NRL objectives and development strategy are aimed at achieving sustainable productivity and profitability and high standards of safety, occupational health and environmental care.This entails human resource re-engineering & development, enhancing value addition, implementing conservation measures and continuing growth through up-gradation of existingas well as addition of new facilities. In the changing global environment, corporate objective and development strategy have been defined to meet the challenges of 21st Century.

Corporate Objectives

- Ensure that business policies and targets are in conformity with the national goals.
- Contribute in meeting the country's demand of petroleum and petrochemical products.
- Customer's satisfaction by providing best value and quality products.
- Optimization of the value of barrel of crude oil and cost reduction through conservation measures.
- Achieving and maintaining a high standard of Occupational Health, Safety and Environmental care.
- Ensure reasonable return on the shareholders' existing and projected investments.
- Maintain modern management systems conforming to international standards needed for an efficient organization.

Development Strategy

- Contribute in national efforts towards attaining sustainable self-efficiency in petroleum products.
- Human resource development by upgrading training facilities and exposure to modern technologies/management techniques.
- Balancing and Modernization for energy conservation and enhanced yield of value added products as well as revamping for environment friendly products.
- Expansion of refining capacity by de-bottlenecking and adding new facilities.
- Acquire newer generation technologies for the efficient refinery operations as well as for attaining highest standards of Occupational Health, Safety and Environmental care.
- Acquiring self-sufficiency in re-engineering, design and fabrication of equipments.

ESG STRUCTURE

NRL's ESG Structure ensures that environmental, social, and governance considerations are integrated into strategic decision-making, operational processes, and corporate oversight. The structure emphasizes board-level guidance, executive accountability, and cross-functional collaboration to drive sustainable performance and stakeholder trust.

1.Board of Directors

- Provides strategic oversight and approves the ESG strategy.
- Reviews ESG performance, climate-related risks, and sustainability initiatives.
- Ensures alignment with corporate governance standards, SECP ESG guidelines, and global best practices.

2.Audit Committee

- Review and assist the Board, on governance and oversight of sustainability risks and opportunities and in setting the company's sustainability strategies.
- Review and recommend to the Board policies to promote diversity, equity and inclusion (DE&I).
- Support the Board in proactively overseeing the key as well emerging sustainability risks, including climate related impacts and recommend mitigation measures.
- Oversee compliance of relevant laws pertaining to sustainability related considerations.

3.CEO & Leadership Team

- Leads the implementation of ESG strategy across operations.
- Integrates sustainability considerations into business planning, risk management, and capital allocation.
- Champions a culture of responsible growth, operational excellence, and innovation.

4.ESG Sustainability Committee

- Chaired by the Coordinator HSE with cross-functional representation (Operations, Finance, Technical, People & Culture).
- Monitors ESG initiatives, identifies emerging sustainability risks and opportunities, and ensures reporting accuracy.
- Oversees stakeholder engagement and translates feedback into actionable initiatives.

5.Departmental ESG Champions

- Department heads across Operations, Finance, Technical, HSE, and People & Culture act as ESG champions within their units.
- Implement ESG initiatives at operational levels, track performance, and ensure compliance with regulatory and internal standards.

ESG STRUCTURE

6.Reporting & Accountability

- Sustainability performance is monitored, measured, and reported through established KPIs, aligned with SECP ESG disclosure requirements, GRI Standards, and SDGs.
- The Sustainability Report Preparation Team coordinates data collection, consolidation, and reporting to the Board and stakeholders.

6.Stakeholder Engagement

- Continuous engagement with employees, investors, regulators, suppliers, customers, and communities to ensure ESG strategy reflects stakeholder expectations and drives positive impact.

LEADERSHIP TEAM

Muhammad Fahim Siddiqui
(Coordinator Maintenance & Projects)

Amir Ahmed Khan
(GM Commercial, Strategy & Innovation)

Rana Waqar Haider
(GM Administration)

Nouman Ahmed Usmani
(Chief Financial Officer)

Muhammad Irfan
(GM Operations)



Ali Raza Bodla
(GM Technical)

Badruddin Khan
(Company Secretary)

Mona Faisal
(Advisor People & Culture)

Nisar Ahmed Khan
(Coordinator Operations)

Asad Hasan
(Chief Executive Officer)

Shahid Waheed Khwaja
(Advisor to the Chairman)

NRL ESG MATERIAL TOPICS

Environmental	• Green House Gas Emissions & Air Quality – Climate Impacts & Fugitive Emission • Energy efficiency & conservation • Water Use & Effluent Management • Hazardous & Non-Hazardous Waste Management • Spill & Chemical Risk
Social	• Occupational Health & safety, • Employee Training, Development & Retention. • Community Engagement & Social Impact • Labor practices & Diversity, Equity & Inclusion
Governance	• Regulatory & Compliance, • Operational Risk Management, • Ethics & Anti-Corruption, • ESG reporting transparency & Assurance

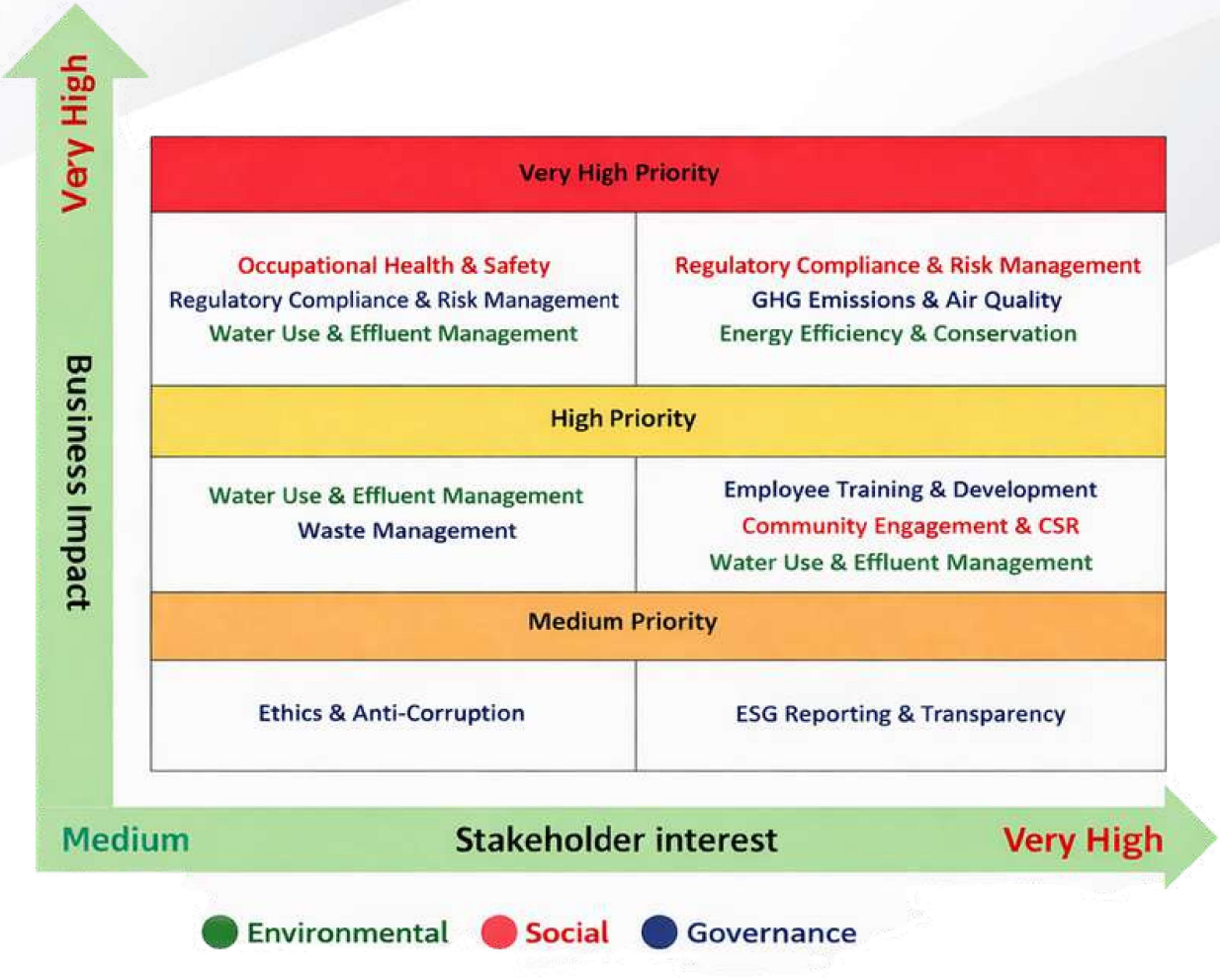
ESG MATERIALITY ASSESSMENT

Materiality Matrix (High / Medium / Low Priority)

Priority	Topics
Very High Priority (High business impact and high stakeholder interest)	• Occupational Health & Safety • Regulatory Compliance & Risk Management • GHG Emissions & Air Quality • Energy Efficiency & Conservation • Climate related Risk
High Priority (Moderate to high impact and stakeholder interest)	• Water Use & Effluent Management • Waste Management • Employee Training & Development • Community Engagement & CSR
Medium Priority (Medium immediate impact but governance-critical)	• Ethics & Anti-Corruption • ESG Reporting &Transparency

NRL ESG MATERIALITY MATRIX

Prioritizing Key Environmental, Social, and Governace Topics



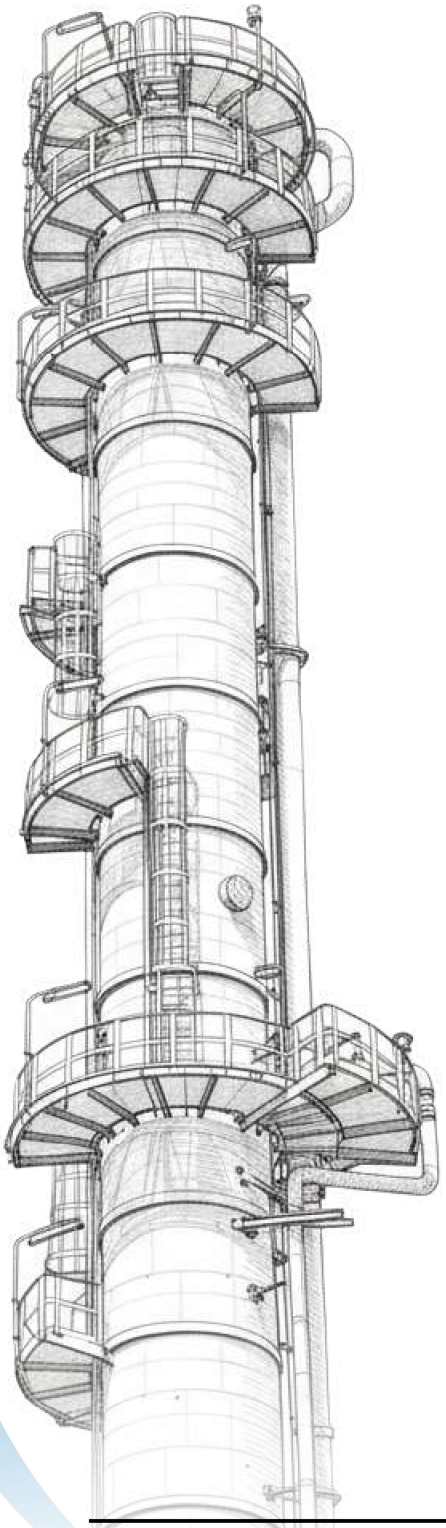
SUSTAINABILITY RISK & OPPORTUNITY MANAGEMENT

ESG MATERIALITY TOPICS, RISK & OPPORTUNITY

ESG Pillar	Material Topic	Key Risks	Opportunities
Environmental	Air Emissions & Climate Impact	Regulatory exceedances, flaring	Emission reduction, energy efficiency
	Effluent & Waste Management	Non-compliance, spills	Improved waste handling, circular economy practices
	Energy & Water Management	Resource inefficiency	Cost savings, reduced carbon footprint
Social	Occupational Health & Safety	Fire, explosion, chemical exposure	Strong safety culture, reduced incidents
	Contractor & Turnaround Safety	Unsafe practices, supervision gaps	Enhanced contractor training, improved turnaround performance
	Emergency Preparedness & Medical Readiness	Delayed response to incidents	Faster response, reduced severity of incidents
	Workforce Welfare & Training	Fatigue, skill gaps	Workforce capability development, retention
	Community & Stakeholder Relations	Local grievances	Improved trust, community engagement
Governance	Regulatory Compliance	Non-compliance with laws	Regulatory trust, risk mitigation
	Asset Integrity & Aging Infrastructure	Equipment failure, leaks	Improved reliability, reduced downtime
	ESG Governance & Reporting	Weak reporting	Enhanced transparency, investor confidence
	Internal Controls	Weak oversight	Improved risk management, operational resilience

NATIONAL REFINERY LIMITED

HEALTH, SAFETY, ENVIRONMENT & QUALITY POLICY



National Refinery Limited (NRL), as a leading fuel refining and petrochemical complex, strives to lead the market by delivering quality products that earn the trust of our customers. Our HSEQ policy is fundamentally driven by the belief that all incidents are preventable. We recognize our responsibility for sustainable development and pledge to the following:

- Protect the health and safety of employees, visitors, contractors, customers and surrounding communities.
- Preserve the environment by preventing pollution, using energy efficiently, and managing resources responsibly.
- Ensure consistently delivering quality products that meet or exceed customer expectations.
- Promote and uphold HSEQ excellence by creating awareness, training, and embedding responsibility, accountability, and continuous improvement in all processes.

NRL MANAGEMENT DEMONSTRATES ITS COMMITMENT BY ENSURING THE FOLLOWING:

- Comply with all applicable legal, regulatory and other HSEQ obligations
- Prevent injuries, illnesses, and incidents by identifying hazards and managing risks, upholding the belief that all incidents are preventable.
- Proactively plan and respond to emergencies through effective preparedness systems that reduce potential impacts.
- Conduct periodic audits to set and review objectives and targets for performance evaluation and assure continual improvement of the HSEQ management system.
- Implement every element of Process Safety Management (PSM) throughout the organization to systematically identify hazards, assess and control risks to prevent catastrophic incidents.
- Strong visible commitment by the Leadership and resource allocation to embed HSEQ objectives into daily operations.
- Engage and empower employees, contractors, and stakeholders through HSEQ consultation, training and awareness to ensure understanding and conformance.

Chief Executive Officer

NRL-IMS-POL-001 Rev-05 / September - 2025

Certificate of Registration

nqa

This is to certify that the Quality Management System of

National Refinery Limited

7-B, Korangi Industrial Area, Karachi - 74900, Karachi.
(Headquarters listed above. See appendix for additional locations.)

applicable to

Manufacturing, Supply, Marketing, Sales and Export of Wide Range of Petroleum Products (Motor Gasoline (MOGAS), Kerosene (SKO), Jet A-1, JP-8, EURO II grade High Speed diesel Oil, Furnace Oil (F.O), Liquefied Petroleum Gas (LPG), Naphtha (For Export), Asphalt Paving Grades, Lube Base Oil, Wax, Slack Wax, Rubber Process Oil, Extract Oil & Sulphur Granular (by-product)) and Petrochemical Products (Benzene, Toluene, Xylene)

has been assessed and registered by NQA against the provisions of

BS EN ISO 9001 : 2015

This registration is subject to the company maintaining a quality management system, to the above standard, which will be monitored by NQA.

Managing Director

Certificate No: 121885
Issue Date: 11 July 2025
Valid Until: 11 July 2028
EAC Code: 10/12

UKAS MANAGEMENT SYSTEMS
0015

MEMBER OF MULTILATERAL RECOGNITION ARRANGEMENT IAF

Signatory of the IAF Arrangement. Holder satisfies accreditation in respect of those activities covered by the accreditation certificate number 015 held by NQA.
NQA is a trading name of NQA Limited, Registration No. 03351758. Registered Office: Warwick House, Houghton Hall Park, Houghton Regis, Dunstable, LU5 5ZX, UK.
This certificate is the property of NQA and must be returned on request.

Certificate of Registration

Appendix to Certificate Number 121885

Includes Facilities Located at:

National Refinery Limited 7-B, Korangi Industrial Area, Karachi - 74900, Karachi.	Manufacturing, Sales and Export of Wide Range of Petroleum Products (Motor Gasoline (MOGAS) , Kerosene (SKO), Jet A-1, JP-8, EURO II grade High Speed diesel Oil, Furnace Oil (F.O), Liquefied Petroleum Gas (LPG), Asphalt Paving Grades, Lube Base Oil, Wax, Slack Wax, Rubber Process Oil, Sulphur Granular (by-product)) and Petrochemical Products (Benzene, Toluene, Xylene)
National Refinery Limited Korangi-Keamari Pipeline & Keamari Terminal	Supply and Marketing of Wide Range of Petroleum Products (Motor Gasoline (MOGAS) , Kerosene (SKO), Jet A-1, JP-8, EURO II grade High Speed diesel Oil, Furnace Oil (F.O), Naphtha (For Export), Lube Base Oil, (Benzene, Toluene, Xylene)

Managing Director

Certificate No: 121885
Issue Date: 11 July 2025
Valid Until: 11 July 2028
EAC Code: 10/12

UKAS MANAGEMENT SYSTEMS
0015

This certificate is the property of NQA and must be returned on request.

Certificate of Registration

This is to certify that the Environmental Management System of

National Refinery Limited

7-B, Korangi Industrial Area, Karachi - 74900, Karachi.
(Headquarters listed above. See appendix for additional locations.)

applicable to

Manufacturing, Supply, Marketing, Sales and Export of Wide Range of Petroleum Products (Motor Gasoline (MOGAS), Kerosene (SKO), Jet A-1, JP-8, EURO II grade High Speed diesel Oil, Furnace Oil (F.O), Liquefied Petroleum Gas (LPG), Naphtha (For Export), Asphalt Paving Grades, Lube Base Oil, Wax, Slack Wax, Rubber Process Oil, Extract Oil & Sulphur Granular (by-product)) and Petrochemical Products (Benzene, Toluene, Xylene)

has been assessed and registered by NQA against the provisions of

BS EN ISO 14001 : 2015

This registration is subject to the company maintaining an environmental management system, to the above standard, which will be monitored by NQA.

Managing Director

Certificate No: 121886
Issue Date: 11 July 2025
Valid Until: 11 July 2028
EAC Code: 10/12

UKAS MANAGEMENT SYSTEMS
0015

Signatory of the IAF Arrangement. NQA Ltd. holds accreditation in respect of those activities covered by the accreditation certificate number 015 held by NQA.
NQA Ltd. is a Limited Company in England and Wales. Limited, Registration No. 08351758. Registered Office: Warwick House, Houghton Hall Park, Houghton Regis, Dunstable, LU5 5ZX, UK.
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Certificate of Registration

Appendix to Certificate Number 121886

Includes Facilities Located at:

National Refinery Limited 7-B, Korangi Industrial Area, Karachi - 74900, Karachi.	Manufacturing, Sales and Export of Wide Range of Petroleum Products (Motor Gasoline (MOGAS) , Kerosene (SKO), Jet A-1, JP-8, EURO II grade High Speed diesel Oil, Furnace Oil (F.O), Liquefied Petroleum Gas (LPG), Asphalt Paving Grades, Lube Base Oil, Wax, Slack Wax, Rubber Process Oil, Sulphur Granular (by-product)) and Petrochemical Products (Benzene, Toluene, Xylene)
National Refinery Limited Korangi-Keamari Pipeline & Keamari Terminal	Supply and Marketing of Wide Range of Petroleum Products (Motor Gasoline (MOGAS) , Kerosene (SKO), Jet A-1, JP-8, EURO II grade High Speed diesel Oil, Furnace Oil (F.O), Naphtha (For Export), Lube Base Oil, (Benzene, Toluene, Xylene)

Managing Director

Certificate No: 121886
Issue Date: 11 July 2025
Valid Until: 11 July 2028
EAC Code: 10/12

UKAS MANAGEMENT SYSTEMS
0015

This certificate is the property of NQA and must be returned on request.

Certificate of Registration

This is to certify that the Occupational Health & Safety Management System of

National Refinery Limited

7-B, Korangi Industrial Area, Karachi - 74900, Karachi.
(Headquarters listed above. See appendix for additional locations.)

applicable to

Manufacturing, Supply, Marketing, Sales and Export of Wide Range of Petroleum Products (Motor Gasoline (MOGAS), Kerosene (SKO), Jet A-1, JP-8, EURO II grade High Speed diesel Oil, Furnace Oil (F.O), Liquefied Petroleum Gas (LPG), Naphtha (For Export), Asphalt Paving Grades, Lube Base Oil, Wax, Slack Wax, Rubber Process Oil, Extract Oil & Sulphur Granular (by-product)) and Petrochemical Products (Benzene, Toluene, Xylene)

has been assessed and registered by NQA against the provisions of

ISO 45001 : 2018

This registration is subject to the company maintaining an occupational health & safety management system, to the above standard, which will be monitored by NQA.

Managing Director

Certificate No: 121887
Issue Date: 11 July 2025
Valid Until: 11 July 2028
EAC Code: 10/12

UKAS MANAGEMENT SYSTEMS
0015

This certificate is the property of NQA and must be returned on request.

Certificate of Registration

Appendix to Certificate Number 121887

Includes Facilities Located at:

National Refinery Limited 7-B, Korangi Industrial Area, Karachi - 74900, Karachi.	Manufacturing, Sales and Export of Wide Range of Petroleum Products (Motor Gasoline (MOGAS) , Kerosene (SKO), Jet A-1, JP-8, EURO II grade High Speed diesel Oil, Furnace Oil (F.O), Liquefied Petroleum Gas (LPG), Asphalt Paving Grades, Lube Base Oil, Wax, Slack Wax, Rubber Process Oil, Sulphur Granular (by-product)) and Petrochemical Products (Benzene, Toluene, Xylene)
National Refinery Limited Korangi-Keamari Pipeline & Keamari Terminal	Supply and Marketing of Wide Range of Petroleum Products (Motor Gasoline (MOGAS) , Kerosene (SKO), Jet A-1, JP-8, EURO II grade High Speed diesel Oil, Furnace Oil (F.O), Naphtha (For Export), Lube Base Oil, (Benzene, Toluene, Xylene)

Managing Director

Certificate No: 121887
Issue Date: 11 July 2025
Valid Until: 11 July 2028
EAC Code: 10/12

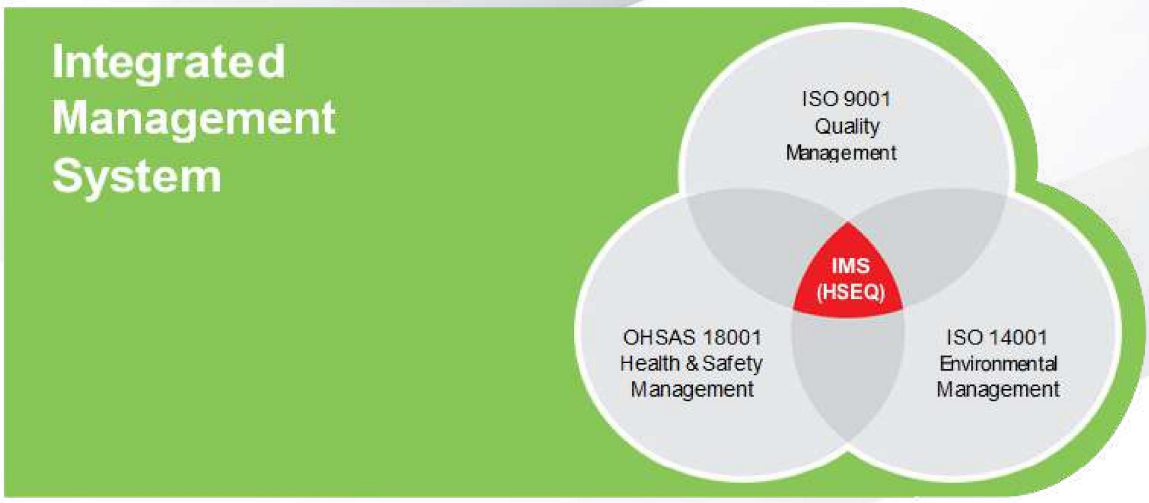
UKAS MANAGEMENT SYSTEMS
0015

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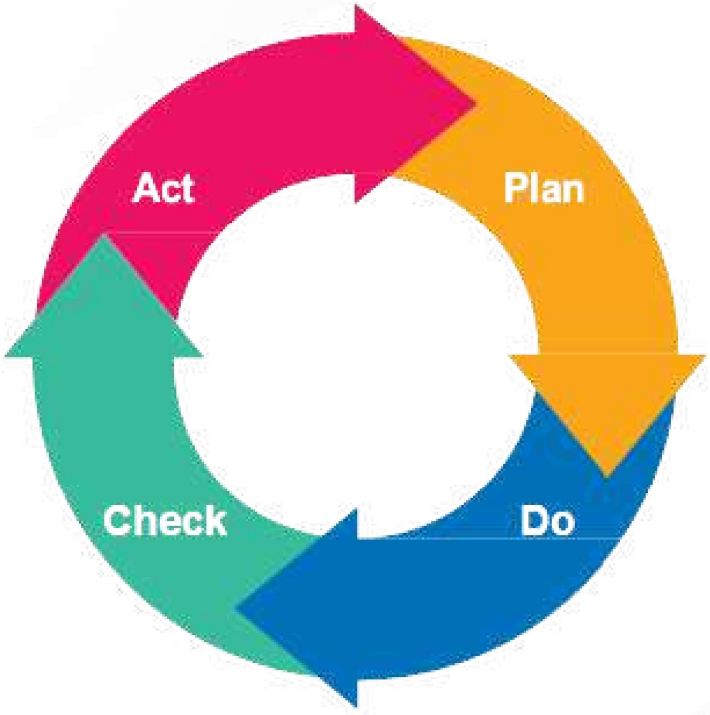
IMS (HSEQ) MANDATORY REQUIREMENTS

S.NO	System Procedure No	System Procedure Title
1	NRL-SPR-DDC-001	Document Data Control And Record Management
2	NRL-SPR-MRM-002	Management Review Meeting
3	NRL-SPR-SRR-003	Structure, Roles, Responsibilities and Accountabilities
4	NRL-SPR-CPA-004	Corrective and Preventive Action
5	NRL-SPR-AWT-005	Awareness, Training and Competence
6	NRL-SPR-CAC-006	Communications, Consultation and Participation
7	NRL-SPR-MAM-007	Calibration, Monitoring and Measurement
8	NRL-SPR-EVC-008	Evaluation of Compliance
9	NRL-SPR-AUD-009	Internal Audit
10	NRL-SPR-EPR-010	Emergency Preparedness and Response
11	NRL-SPR-TRR-011	Tracking of Regulations and other Requirements
12	NRL-SPR-AAP-012	Agency Approvals for EMS & OHSAS
13	NRL-SPR-OCP-013	Operational Control
14	NRL-SPR-CCP-014	Contractor Control
15	NRL-SPR-AIA-015	Environmental Aspects & Impacts Analysis
16	NRL-SPR-EOT-016	Environmental Objectives, Targets and Management
17	NRL-SPR-HRA-017	Occupational Health & Safety Hazards Identification and Risks Assessment
18	NRL-SPR-OTM-018	Occupational Health & Safety Objectives and Management Programs
19	NRL-SPR-RIP-019	Review of (HSEQ) Identified Projects
20	NRL-SPR-NCR-020	Control of Non-Conforming Product
21	NRL-SPR-QOB-021	Quality Objectives, Targets and Analysis of Data
22	NRL-SPR-PRO-022	Process Risk and Opportunity Management

INTEGRATED MANAGEMENT SYSTEM



IMS (HSEQ) MANAGEMENT SYSTEM



Plan

1. HSEQ Policy
2. Aspects, Hazards & Risks
3. Roles and Responsibilities
4. Objectives & Targets
5. Operational Plan
6. Maintenance Plan
7. Legal and other Requirement

Do

8. HSE improvement program(s)
9. Operational Control / Product realization
10. Emergency Preparedness & Response
11. Training
12. Communication , Consultation and Participation
13. Documentation

Check

14. Performance Measurement & monitoring
15. Record keeping
16. HSEQ Audit
17. Accident, Incident
18. Data Analysis
19. Non-Conformance, Corrective and Preventive Action

Act

20. HSE Main / Sub committee
21. Management Review

EMERGENCY PREPAREDNESS AND RESPONSE

S.NO	Procedure No	Procedure Title / Situation Description
1	NRL-SPR-EPR-010	Emergency Preparedness and Response
2	NRL-SPR-OCP-013	Operational Control
3	NRL-SOP-ADM-005	Emergency Response Plan for Telecommunication failure external
4	NRL-SOP-ADM-009	Rain Emergency Management
5	NRL-SOP-PGR-006	Procedure for Power Supply arrangement during failure of TG/DG
6	NRL-SOP-PGR-018	Load / Supply arrangement during failure of any source or all sources
7	NRL-SOP-HSE-006	Emergency Response Plan for Oil Spillage from a storage tanks
8	NRL-SOP-HSE-007	Emergency Response Plan for Chemical Spillage
9	NRL-SOP-HSE-008	Emergency Response Plan for (Korangi-Keamari) pipeline
10	NRL-SOP-HSE-009	Contingency Plan for Terrorist Attack (Bomb Threat)
11	NRL-SOP-HSE-010	Emergency Response Plan for Flood Control
12	NRL-SOP-HSE-011	Emergency Response Plan for propane / LPG Handling / Mass release of flammable gases
13	NRL-SOP-HSE-017	Evacuation Procedure for Lube-I
14	NRL-SOP-HSE-018	Evacuation Procedure for Lube-II
15	NRL-SOP-HSE-019	Evacuation procedure for Fuel Refinery
16	NRL-SOP-HSE-020	Evacuation Procedure for Old Boiler House Utilities
17	NRL-SOP-HSE-021	Evacuation procedure for Boiler-V / Power Generation
18	NRL-SOP-HSE-022	Emergency Response Plan for Earthquakes
19	NRL-SOP-HSE-024	Procedure for Management Block evacuation in case of Fire, Bomb Threat, or other emergencies like earthquake

EMERGENCY PREPAREDNESS AND RESPONSE

S.NO	Procedure No	Procedure Title / Situation Description
20	NRL-SOP-HSE-025	Procedure for Mock Drill (Fire) Korangi and Keamari Terminal
21	NRL-SOP-HSE-026	Emergency Response Plan for handling spillage of oil due to leakage of pipelines in pipe alley, all tank lorries, including JP-I / JP-8 Bowzers
22	NRL-SOP-HSE-027	Evacuation procedure for Shipping & Excise Building
23	NRL-SOP-HSE-028	Procedure for Operation Block evacuation in case of Fire, Bomb Threat or other emergencies like earthquake
24	NRL-SOP-HSE-029	Evacuation procedure for Oil Movement-1 Office
25	NRL-SOP-FPR-002	Fire Watch Coverage Procedure
26	NRL-SOP-FPR-005	Safety requirements for Excavation
27	NRL-SOP-FPR-006	Live Fire Drills / Exercise at Korangi Refinery
28	NRL-SOP-FPR-007	Emergency Response Plan of Handling or Establishing Fire Fighting arrangement for combating fire like situation at Korangi-Keemari Pipelines
29	NRL-SOP-FPR-008	Fire Fighting Plan for Korangi refinery
30	NRL-SOP-FPR-009	Fire Fighting Plan for NRL Keamari Terminal
31	NRL-SOP-FPR-010	Fire Drill / Exercise at Keamari Terminal
32	NRL-SOP-FPR-016	Hose Handling practice
33	NRL-SOP-FPR-012	Ensuring the fire water network operability and reliability testing to ensure the integrity & sustainability to meet emergencies
34	NRL-SOP-OKR-024	Emergency Response plan for oil spills from carrying crude oil (Having heavy leakage from its body)
35	NRL-SOP-OKR-025	Emergency Response Plan to control the leakage from Bottom / Shell of a storage tank to recover spilled oil from the area

EMERGENCY PREPAREDNESS AND RESPONSE

S.NO	Procedure No	Procedure Title / Situation Description
36	NRL-SOP-OKR-026	Emergency Response plan increase of overflow of a storage tank
37	NRL-SOP-OKR-032	Emergency Response Plan for un-loading of asphalt tank lorry having leakage from its body
38	NRL-SOP-OKR-036	Handling of field & empty chemical drums / container, contingency plan of chemical drums / container
39	NRL-SOP-OKR-046	Emergency Response Plan for handling spillage of JP-8 tank lorry having leakage from its body
40	NRL-SOP-LR1-001	Emergency Shutdown Procedure for PDA-I Unit
41	NRL-SOP-LR1-008	Emergency shutdown procedure for Two-Stage / Bender Unit
42	NRL-SOP-LR1-012	Emergency Shutdown Procedure for FEU-I Unit
43	NRL-SOP-LR1-017	Emergency shutdown procedure for BTX unit
44	NRL-SOP-LR1-026	Emergency shutdown procedure for MEK/HFU Unit
45	NRL-SOP-LR1-031	Handing of filled chemical drums contingency plan.
46	NRL-SOP-LR2-001	Emergency shutdown of Vacuum Distillation unit incase of power failure
47	NRL-SOP-LR2-008	Emergency shutdown procedure of Propane De-Asphalting unit
48	NRL-SOP-LR2-016	Emergency shutdown operating procedure for FEU unit of Lube-II Refinery
49	NRL-SOP-LR2-025	Emergency shutdown operating procedure for MEK unit of Lube-II Refinery
50	NRL-SOP-LR2-036	Mitigation plan / Procedure for Heat Exchanger leakage from flanges
51	NRL-SOP-LR2-042	Emergency Shutdown procedure for MEK Dilchill Dewaxing unit

EMERGENCY PREPAREDNESS AND RESPONSE

S.NO	Procedure No	Procedure Title / Situation Description
52	NRL-SOP-FRE-007	Emergency shutdown procedure of 101-Crude Distillation Unit
53	NRL-SOP-FRE-034	Mitigation plan / Procedure for heat Exchanger leakage from flanges
54	NRL-SOP-FRE-041	Emergency shutdown procedure of Naphtha Hydrobon and Platforming unit in case of power failure, steam failure, cooling-water failure, charge oil pump failure, instrument air failure, 102-F1/F2 Tube Rupture
55	NRL-SOP-FRE-046	Emergency shutdown procedure of Propane Recovery unit in case of steam failure, cooling water failure, instrument air failure
56	NRL-SOP-TLW-009	Evacuation procedure for Workshop
57	NRL-SOP-TLW-015	Emergency Response Plan for malfunctioning of workshop machine
58	NRL-SOP-OKT-014	Procedure for Evacuation of Keamari Terminal
59	NRL-SOP-OKT-022	Emergency Preparedness and Response Plan for Keamari Terminal
60	NRL-SOP-OKT-024	Procedure for Mutual Aid Emergency Response (MAERP) & Communication Management System for Oil Installation area at Keamari
61	NRLSOP-WHS-010	Procedure for Contingency plan for Chemical spillage
62	NRL-SOP-WHS-011	Evacuation procedure for HR training center / Ware House / Local manufacturing
63	NRL-SOP-OKT-024	Mutual Aid Emergency Response Plan
64	-	NRL Disaster management Plan
65	-	Business Continuity Plan

CORPORATE GOVERNANCE



CODE OF CONDUCT

National Refinery Limited (the Company) is engaged in the manufacturing of a wide range of petroleum products with the objective to achieve sustainable productivity, profitability and high standards of safety, occupational health and environmental care. This entails human resource development, enhancing value addition, implementing conservation measures and growth by up-gradation and addition of newer generation technologies.

The Company requires all its Board Members and Employees to act within the authority conferred upon them and in the best interests of the Company and observe all the Company's policies and procedures as well as relevant laws and regulations, as are applicable in individual capacity or otherwise, including but not limited to the corporate values, business principles and the acceptable and unacceptable behaviour (hereinafter called the Company's Code of Conduct) embodied in this document.

The Company believes that the credibility, goodwill and repute earned over the years can be maintained through continued conviction in our corporate values of honesty, justice, integrity and respect for people. The Company strongly promotes trust, openness, teamwork and professionalism in its entire business activities.

- The business principles are derived from the above stated corporate values and are applied to all facets of business through well-established procedures. These procedures define behaviour expected from each employee in the discharge of his/her responsibility.
- NRL recognizes the following obligations, which need to be discharged with best efforts, commitment and efficiency:
  - Safeguarding of shareholders' interest and a suitable return on equity.
  - Service customers by providing products which offer value in terms of price, quality, safety and environmental impact.
  - Respect human rights, provide a congenial working environment, offer competitive terms of employment, develop human resources and be an equal opportunity employer.
  - Seek mutually beneficial business relationships with contractors, suppliers and investment partners.
- The Company believes that profit is essential for business survival. It is a measure of efficiency and the value that the customer places on products and services produced by the Company.
- The Company requires honesty and fairness in all aspects of its business and in its relationships with all those with whom it does business. The direct or indirect offer, payment, soliciting and accepting of bribe in any form is undesirable.
- The Company is fully committed to reliability and accuracy of financial statements and transparency of transactions in accordance with established procedures and practices.
- The Company does not support any political party or contribute funds to groups having political interests. The Company will, however, promote its legitimate business interests through trade associations.

CODE OF CONDUCT

- The Company, consistent with its commitments to sustainable development, has a systematic approach to the management of health, safety and environment.
- The Company is committed to observe the laws of Pakistan and is fully aware of its social responsibility. It would assist the community in activities such as education, sports, environmental preservation, training programs, skills development and employment within the parameters of its commercial objectives.
- The Company supports a free market system. It seeks to compete fairly and ethically within the framework of applicable competition laws in the country. The Company will not stop others from competing freely with it.
- In view of the critical importance of its business and its impact on the national economy, the Company provides all relevant information about its activities to legitimate interested parties, subject to any overriding constraints of confidentiality and cost.
- The Company requires all its Board Members and employees to avoid conflicts of interest between private financial and/or other activities and their professional role in the conduct of Company business.
- No Board Member or employee shall in any manner disclose to any person or cause disclosure of any information or documents, official or otherwise, relating to the Company, except those published, unless he/she is authorised by the management.
- All papers, books, drawings, sketches, photographs, documents and similar papers containing analysis, formulas, notes or information relating to the Company's business affairs or operations shall always be treated as Company property, whether prepared by the employee or otherwise, and no employee shall be permitted to carry any of these outside business premises unless specifically authorised to do so by the management.
- The Company's property, funds, facilities and services must be used only for authorised purposes.
- The Board Members or employees of the Company, specifically those coming into direct contact with vendors doing or seeking to do business with the Company, shall not receive favours or incur obligations. In case any contractor/supplier having business relations with the Company happens to be a relative of an official who is entrusted with the responsibility of opening, evaluation or award of supply/contract jobs, or with execution or certification of material/services, he/she shall immediately bring this fact to the notice of the Managing Director, who may entrust the responsibility to another.
- Each employee shall devote his/her full time and energy exclusively to the business and interests of the Company. In particular, no employee (including those on leave), unless otherwise permitted by the Company, shall directly or indirectly engage in any other profession or business or enter into the services of, or be employed in any capacity for any purpose whatsoever, and for any part of his/her time, by any other person, government department, firm or company, and/or shall not have any private financial dealings with any persons or firms having business relations with the Company for sale or purchase of any materials or equipment or supply of labour or for any other purpose.Every employee shall hold himself/herself in readiness to perform any duties required of him/her by his/her superiors to the best of his/her ability.

CODE OF CONDUCT

- No Board Member or employee of the Company shall, directly or indirectly, deal in the shares of the Company in any manner during the closed period, as determined and informed by the Company.
- No Board Member or employee of the Company shall practice insider trading.
- Without prejudice to any penal action defined in any statute, as applicable, against any kind of non-compliance/violations, non-compliance with the Company's Code of Conduct may expose the person involved to disciplinary action as per the Company's rules and/or as determined by the management or the Board of Directors of the Company, as the case may be, on a case-to-case basis.
- The Company is fully committed to providing a safe and respectful working environment for all employees. We strictly prohibit any form of harassment in the workplace. Any instance of harassment will be promptly and thoroughly inquired into, and if the accused is found guilty, penalties will be imposed in accordance with the Company's Code of Conduct for Protection against Harassment at Workplace and applicable laws.

STATEMENT OF COMPLIANCE WITH LISTED COMPANIES (CODE OF CORPORATE GOVERNANCE) REGULATIONS, 2019

FOR THE YEAR ENDED JUNE 30, 2025

The company has complied with the requirements of the Regulations in the following manner

1. The total number of directors are eight (8) as per the following:

a.	Male	Eight
b.	Female*	None

** The Company has filed a constitutional petition before the Honorable High Court of Sindh challenging, inter alia, the compliance of clause No. 7 of the Regulations relating to appointment of female director, which is pending adjudication. The law officer of Securities and Exchange Commission of Pakistan has undertaken that no action contrary to the law would be taken against the Company.*

2. The composition of board is as follows:

	Category	Names
a)	Independent Directors	Mr. Shamim Ahmad Khan Mr. Khondamir Nusratkhujaev Mr. Tariq Iqbal Khan
b)	Non-Executive Directors	Mr. Laith G. Pharaon Alternate Director: Mr. Sajid Nawaz Mr. Wael G. Pharaon Alternate Director: Mr. Babar Bashir Nawaz Mr. Shuaib A. Malik Mr. Abdus Sattar
c)	Executive Director	Mr. Asad Hasan Chief Executive Officer
d)	Female Directors	None

3. The directors have confirmed that none of them is serving as a director on more than seven listed companies, including this company.

STATEMENT OF COMPLIANCE WITH LISTED COMPANIES (CODE OF CORPORATE GOVERNANCE) REGULATIONS, 2019

FOR THE YEAR ENDED JUNE 30, 2025

4. The company has prepared a Code of Conduct and has ensured that appropriate steps have been taken to disseminate it throughout the company along with its supporting policies and procedures;

5. The Board has developed a vision/mission statement, overall corporate strategy and significant policies of the company. The Board has ensured that complete record of particulars of the significant policies along with their date of approval or updating is maintained by the company;

6. All the powers of the Board have been duly exercised and decisions on relevant matters have been taken by the Board / shareholders as empowered by the relevant provisions of the Act and these Regulations;

7. The meetings of the Board were presided over by the Chairman and, in his absence, by a director elected by the Board for this purpose. The Board has complied with the requirements of Act and the Regulations with respect to frequency, recording and circulating minutes of meeting of the Board;

8. The Board has a formal policy and transparent procedures for remuneration of directors in accordance with the Act and these Regulations;

9. The Directors were apprised of their duties and responsibilities from time to time. Seven directors have either already attended the directors' training program as required in previous years or meet the exemption criteria as contained in the Regulations;

10. The Board has approved appointment of Chief Financial Officer, Company Secretary and Head of Internal Audit, including their remuneration and terms and conditions of employment and complied with relevant requirements of the Regulations;

11. Chief Financial Officer and Chief Executive Officer duly endorsed the financialstatements before approval of the board;

12. The Board has formed committees comprising of members given below:

STATEMENT OF COMPLIANCE WITH LISTED COMPANIES (CODE OF CORPORATE GOVERNANCE) REGULATIONS, 2019

FOR THE YEAR ENDED JUNE 30, 2025

A) Audit Committee

Mr. Shamim Ahmad Khan - Chairman
Mr. Abdus Sattar
Mr. Babar Bashir Nawaz (Alternate Director for Mr. Wael G. Pharaon)

B) HR and Remuneration Committee

Mr. Shamim Ahmad Khan - Chairman
Mr. Shuaib A. Malik
Mr. Babar Bashir Nawaz (Alternate Director for Mr. Wael G. Pharaon)
Mr. Asad Hasan

13. The terms of reference of the aforesaid committees have been formed, documented and advised to the committee for compliance;

14. The frequency of meetings of the committee were as per following: a) Audit Committee: Quarterly b) HR and Remuneration Committee: Yearly;

15. The Board has set up an effective internal audit function experienced for the purpose and is conversant with the policies and procedures of the Company;

16. The statutory auditors of the company have confirmed that they have been given a satisfactory rating undertheQuality Control Review programofthe Institute of Chartered Accountants of Pakistan and registered with Audit Oversight Board of Pakistan, that they and all their partners are in compliance with International Federation of Accountants (IFAC) guidelines on code of ethics as adopted by the Institute of Chartered Accountants of Pakistan and that they and the partners of the firm involved in the audit are not a close relative (spouse, parent, dependent and non-dependent children) of the chief executive officer, chief financial officer, head of internal audit, company secretary or director of the company;

17. The statutory auditors or the persons associated with them have not been appointed to provide other services except in accordance with the Act, these regulations or any other regulatory requirement and the auditors have confirmed that they have observed IFAC guidelines in this regard;

18. We confirm that all requirements of the regulations 3,6,7,8,27,32,33 and 36 of the Regulations have been complied with; and

19. Explanation for non-compliance with requirements, other than regulations 3, 6, 7, 8, 27, 32, 33 and 36 (non-mandatory requirements) are below:

S. No.	Requirement	Explanation	Reg. No.
1	The Board may constitute a separate committee, designed as the nomination committee, of such number and class of directors, as it may deem appropriate in its circumstances.	The responsibilities as prescribed for the nomination committee are being taken care of at board level as and when needed so a separate committee is not considered to be necessary.	29
2	The Board may constitute the risk management committee, of such number and class of directors, as it may deem appropriate in its circumstances, to carry out a review of effectiveness of risk management procedures and present a report to the Board.	The Board has not constituted a risk management committee as risk management framework is managed at Company's level by the leadership team which is headed by the CEO and the CEO apprises the Board accordingly.	30
3	The Company may post on its website key elements of its significant policies including but not limited to the following: 1. Communication and disclosure policy; 2. Code of conduct for members of board of directors, senior management and other employees; 3. Risk management policy; 4. Internal control policy; 5. Whistle blowing policy; 6. Corporate social responsibility / sustainability / environmental, social and governance related policy; 7. Policies for promoting DE&I and protection against harassment at the workplace.	As the regulation provides concession with respect to disclosure of key elements of significant policies on the website, only those policies which were considered necessary, have been posted.	35(1)

On behalf of the Board

Asad Hasan
Chief Executive Officer

Shuaib A. Malik
Chairman

August 11, 2025

pwc

A·F·FERGUSON&Co.

INDEPENDENT AUDITOR'S REVIEW REPORT
TO THE MEMBERS OF NATIONAL REFINERY LIMITED

Review Report on the Statement of Compliance contained in Listed Companies (Code of Corporate Governance) Regulations, 2019

We have reviewed the enclosed Statement of Compliance with the Listed Companies (Code of Corporate Governance) Regulations, 2019 (the Regulations) prepared by the Board of Directors of National Refinery Limited (the Company) for the year ended June 30, 2025 in accordance with the requirements of regulation 36 of the Regulations.

The responsibility for compliance with the Regulations is that of the Board of Directors of the Company. Our responsibility is to review whether the Statement of Compliance reflects the status of the Company's compliance with the provisions of the Regulations and report if it does not and to highlight any non-compliance with the requirements of the Regulations. A review is limited primarily to inquiries of the Company's personnel and review of various documents prepared by the Company to comply with the Regulations.

As a part of our audit of the financial statements we are required to obtain an understanding of the accounting and internal control systems sufficient to plan the audit and develop an effective audit approach. We are not required to consider whether the Board of Directors' statement on internal control covers all risks and controls or to form an opinion on the effectiveness of such internal controls, the Company's corporate governance procedures and risks.

The Regulations require the Company to place before the Audit Committee, and upon recommendation of the Audit Committee, place before the Board of Directors for their review and approval, its related party transactions. We are only required and have ensured compliance of this requirement to the extent of the approval of the related party transactions by the Board of Directors upon recommendation of the Audit Committee.

Based on our review, nothing has come to our attention which causes us to believe that the Statement of Compliance does not appropriately reflect the Company's compliance, in all material respects, with the requirements contained in the Regulations as applicable to the Company for the year ended June 30, 2025.

Further, we highlight content of paragraph 1 of the statement where the matter of representation of female director on the Board of Directors of the Company has been explained.

A.F.Ferguson & Co.
Chartered Accountants
Karachi

Dated: September 4, 2025

UDIN: CR202510059n08IYKRB7

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■KARACHI ■LAHORE ■ISLAMABAD

TERMS OF REFERENCE OF AUDIT COMMITTEE

The Board has constituted a fully functional Audit Committee. The features of the terms of reference of the committee in accordance with the Code of Corporate Governance are as follows:

- Determination of appropriate measures to safeguard the company's assets;
- Review of preliminary announcements of results prior to external communication and publication;
- Review of quarterly, half-yearly and annual financial statements of the company, prior to their approval by the Board of Directors, focusing on:
    - Major judgmental areas;
    - Significant adjustments resulting from the audit;
    - The going concern assumption;
    - Any changes in accounting policies and practices;
    - Compliance with applicable accounting standards;
    - Compliance with the code of corporate governance regulations and other statutory and regulatory requirements; and
    - All related party transactions.
- Facilitating the external audit and discussion with external auditors of major observations arising from interim and final audits and any matter that the auditors may wish to highlight (in the absence of management, where necessary);
- Review of management letter issued by external auditors and management's response thereto;
- Ensuring coordination between the internal and external auditors;
- Review of the scope and extent of internal audit, audit plan, reporting framework and procedures and ensuring that the internal audit function has adequate resources and is appropriately placed;
- Consideration of major findings of internal investigations of activities characterized by fraud, corruption and abuse of power and management's response thereto;
- Ascertaining that the internal control systems including financial and operational controls, accounting systems for timely and appropriate recording of purchases and sales, receipts and payments, assets and liabilities and reporting structure are adequate and effective;
- Review of company's statement on internal control systems prior to endorsement by the Board of Directors and internal audit reports;
- Instituting special projects, value for money studies or other investigations on any matter specified by the Board of Directors, in consultation with the Chief Executive and to consider remittance of any matter to the external auditors or to any other external body;

TERMS OF REFERENCE OF AUDIT COMMITTEE

- Determination of compliance with relevant statutory requirements;
- Monitoring compliancewith the code of corporate governance regulations and identification of significant violations thereof;
- Review of arrangement for staff and management to report to audit committee in confidence, concerns, if any, about actual or potential improprieties in financial and other matters and recommend instituting remedial and mitigating measures;
- Recommend to the Board the appointment of external auditors, their removal, audit fees, the provision of any service permissible to be rendered to the company by the external auditors in addition to audit of its financial statements, measures for redressal and rectification of non-compliances with the Regulations;
- Review and assist the Board, on governance and oversight of sustainability risks and opportunities, which includes the environmental, social and governance considerations, within the company, in setting the company'ssustainability strategies, priorities and targets to create long term corporate value;
- Review and recommend to the Board policies to promote diversity, equity and inclusion (DE&I) are in place to encourage gender mainstreaming, gender equality and the participation of women on the board, management and workforce of the company;
- Support the Board in proactively identifying, understanding, and overseeing the principal as well as the emerging sustainability risks and opportunities relevant to the company and its business, including climate-related risks and opportunities, assess their potential financial and operational impacts, and recommend strategies for management and mitigation thereof;
- Ensures that the company's sustainability and DE&I related strategies, priorities and targets as well as performance against these targets are periodically reviewed and monitored;
- Monitor and review sustainability related risks and opportunities of the company, oversee compliance of relevant laws pertaining to relevant sustainability related considerations and its appropriate disclosures;
- Submit to the board a report, at least once a year, on embedding sustainability principles into the company's strategy and operations to increase corporate value;
- Review and recommend directors report that provide adequate disclosures regarding the assessment of sustainability related risks, how these are managed or mitigated, and measures taken to promote DE&I in the Company;
- Consideration of any other issue or matter as may be assigned by the Board.

TERMS OF REFERENCE OF HUMAN RESOURCE AND REMUNERATION (HR&R) COMMITTEE

The Board adopted the responsibilities contained in clause (xxv) of the Code 2012 from (i) to (iv) as the Terms of Reference (TOR) of the HR&R Committee.

The committee shall be responsible for:

i. Recommending human resource management policies to the board;

ii. Recommending to the board the selection, evaluation, compensation (including retirement benefits) and succession planning of the CEO;

iii. Recommending to the board the selection, evaluation, compensation (including retirement benefits) of COO, CFO, Company Secretary and Head of Internal Audit;

iv. Consideration and approval on recommendations of CEO on such matters for key management positions who report directly to CEO or COO.

GENDER PAY GAP STATEMENT UNDER SECP'S CIRCULAR 10 OF 2024

Following is gender pay gap analysis calculated for the year ended June 30, 2025:

1. Mean Gender Pay Gap: 5.79 %
2. Median Gender Pay Gap: (1.80) %

The above percentages reflect the gender pay gap of relevant male versus female employees in different employment grades across the organization.

We are an equal opportunity employer and do not discriminate in pay based on gender. We remain fully committed to promoting gender diversity and equality in our compensation practices.



Chief Executive Officer
Date: August 11, 2025

CORPORATE SOCIAL RESPONSIBILITY

At the heart of our sustainability journey lies a strong commitment to Corporate Social Responsibility (CSR) — a commitment that extends beyond compliance and reflects our responsibility as a corporate citizen. As a refinery operating at the core of the nation's energy ecosystem, we recognize that our success is intrinsically linked to the well-being of our stakeholders and the communities in which we operate.

Our CSR philosophy is built on inclusivity and impact. We strive to engage all our stakeholders—employees, contractors, business partners, and the surrounding community—through meaningful, in-kind initiatives that address real needs and create lasting value. Whether through support for education, healthcare, environmental stewardship, or community development, our efforts are guided by the principle of giving back as much as we can to the society that enables our operations.

Looking ahead, we are committed to accelerating our CSR initiatives year on year, both in scale and effectiveness. By continuously expanding our outreach and deepening our engagement, we aim to strengthen trust, foster shared progress, and contribute positively to sustainable development. Our CSR journey is an evolving one—rooted in responsibility today and driven by a vision for a more resilient and inclusive tomorrow.

Below are some initiatives taken by NRL throughout the year focused on education, healthcare, the environment, and community development.



OLD AGE HOUSE VISIT – DAR UL SUKOON

A visit to an old age home was organized as part of our Corporate Social Responsibility (CSR) initiative. The visit aimed to spend quality time with the residents, engage in meaningful conversations, and understand their thoughts and experiences.



The NRL team, had a wonderful time interacting with the residents. They shared memories, listened to their stories, and gained meaningful insights into their lives. The visit not only brought joy to the residents but also served as a reminder of the importance of compassion and empathy in our lives.

BLOOD DRIVE – INDUS HOSPITAL

A Blood Donation Drive was organized in collaboration with the Indus Hospital, whose expertise and dedicated support played a vital role in the success of this initiative. The drive aimed to support the noble cause of saving lives while fostering a culture of voluntary blood donation within the organization.



The event witnessed enthusiastic participation from employees, reflecting a strong spirit of social responsibility across the Company. This successful initiative stands as a testament to National Refinery Limited's commitment to giving back to society and making a meaningful, positive impact on the wider community.

RAHBAR FOUNDATION

The Rahbar Program is one of The Citizens Foundation's most successful and impactful initiatives, designed to promote social responsibility and active citizenship. Recognizing the program's strong track record and meaningful community impact, NRL partnered with TCF to implement the Rahbar Program following a comprehensive selection process. Selected employees participated in the program in accordance with the guidelines and protocols established by TCF. Through their engagement, participants contributed their time, skills, and commitment toward initiatives aimed at creating lasting, positive change within the community.



MEDICAL CAMP – DAR UL SEHAT HOSPITAL

A medical camp was organized in collaboration with a leading hospital Dar – Ul - Sehat. The camp offered various health tests and consultations with specialist doctors and was undertaken to enhance health awareness among employees. Employees actively participated in the program and received CPR training, strengthening awareness of life-saving techniques and emergency preparedness.

The camp recorded strong employee participation, with many individuals availing medical consultations and essential health screenings. This program supported the Company's ongoing focus on employee health, safety, and well-being. Similar initiatives will continue to be implemented as part of National Refinery Limited's sustainability and people-centric agenda.



MEN'S HEALTH AWARENESS SESSION

Health Awareness Session was also organized by our inhouse Medical team. The session aimed to educate employees on men's health issues, both on and off the field. We believe that such awareness sessions are essential for promoting health and wellness among our employees.



IN-HOUSE PLANT NURSERY, GARDENS AND PLAYGROUND MANAGEMENT

To support long-term sustainability of its green initiatives, NRL operates an in-house plant nursery where saplings are grown for plantation across the refinery premises. This approach ensures continuity of plantation activities and reduces dependency on external sources. Well-maintained gardens and landscaped areas within the refinery contribute to a cleaner, greener, and healthier working environment. Additionally, NRL maintains playgrounds and green recreational spaces to promote employee well-being, work-life balance, and social engagement. These initiatives demonstrate NRL's integrated approach toward environmental conservation, social responsibility, and sustainable development.





BIODIVERSITY PROTECTION

National Refinery Limited (NRL) places strong emphasis on biodiversity protection as part of its Corporate Social Responsibility (CSR) and Environmental, Social and Governance (ESG) commitments. The Company believes that responsible industrial operations must go hand in hand with the protection of natural resources and the well-being of surrounding communities. NRL continues to take practical and sustainable measures to enhance green cover, protect local ecosystems, and create a healthy environment for employees and neighboring areas.

TREE PLANTATION AROUND REFINERY BOUNDARIES

NRL regularly undertakes tree-plantation activities along the refinery boundaries to develop and maintain a green belt. This green belt plays an important role in reducing dust, noise, and the impact of emissions, while also improving air quality. Indigenous and climate-appropriate tree species are selected to support local biodiversity and ensure sustainable growth. These plantation activities also contribute to carbon absorption and help strengthen the ecological balance in the area, reflecting NRL's commitment to environmental protection and climate responsibility.

PLANTATION DRIVE

NRL took a step towards environmental conservation by partnering with DC Korangi to support a green project aimed at promoting plantation and greenery in the city. By supporting such green projects, NRL aims to promote a culture of environmental sustainability and growth.

EMPLOYEE ENGAGEMENT

PAKISTAN INDEPENDENCE DAY CELEBRATION – 14TH AUGUST

National Refinery Limited proudly celebrated Pakistan's 78th Independence Day with great enthusiasm and a strong sense of patriotism. The day was marked with flag hoisting, national songs, and heartfelt tributes to our beloved homeland.

At NRL, we believe that the values of unity, faith, and discipline not only define our nation but also guide our commitment to excellence in everything we do. Here is to working together to build a stronger, greener, and more prosperous Pakistan.



LONG SERVICE AWARD CEREMONY

Our Long Service Awards Ceremony was a celebration of loyalty, perseverance, and the incredible stories of our employees. From those who have been with us for 10 years to those celebrating 25+ years, each milestone represents a journey of hard work, growth, and unwavering commitment to NRL.

We heard inspiring stories of resilience, teamwork, and passion that have shaped not only their careers but also the success of our organization. It was a proud moment for all of us to honor their contributions and reflect on the impact they've made. A huge thank you to all our employees for their dedication and commitment.



EID MILAN PARTY 2025 – A DAY OF JOY, UNITY & CELEBRATION

We had the pleasure of hosting a heartwarming Eid Milan Party to celebrate the joyous occasion of Eid-ul-Fitr with our dedicated employees.

The event was filled with smiles, laughter, traditional treats, and a strong sense of togetherness — a true reflection of the spirit of Eid!

Such moments not only bring us closer as colleagues but also strengthen the culture of appreciation, respect, and unity within the NRL family.



NATIONAL REFINERY CRICKET CHAMPIONSHIP 2025

We organized our annual Cricket Championship, and it was nothing short of an unforgettable experience!From thrilling matches to intense competition, every moment was memorable.



HUMAN CAPITAL DEVELOPMENT AND LEARNING

During the reporting year, National Refinery Limited's Human Resource Development (HRD) initiatives were focused on strengthening a learning culture and enhancing employee capabilities to support long-term business sustainability.

The onboarding and orientation framework was further strengthened to facilitate the effective integration of new employees into the organization and its values. To promote continuous learning and leadership capability, employees were provided access to industry experts and mentors through structured leadership talks and knowledge-sharing sessions. In addition, an online learning platform was implemented, enabling flexible, self-paced learning and delivering training programs aligned with organizational and operational requirements, with emphasis on leadership, technical, and soft skills development.

Capability building remains a core pillar of NRL's sustainable performance strategy. During 2025, the Company delivered over 12,000 training man-hours, demonstrating its commitment to continuous learning and professional development across all levels of the workforce.

Training interventions covered a wide range of focus areas, including Health, Safety and Environment (HSE), technical competency enhancement for engineers and plant operators, leadership development programs aimed at building a future-ready leadership pipeline, and contractor safety and compliance programs to ensure alignment with NRL's HSE standards.

NRL's Trainee Engineer, Management Trainee, and Apprenticeship programs continue to function as key talent pipelines, providing structured, hands-on learning opportunities across engineering and management disciplines, and supporting long-term workforce sustainability.

NRL considers investment in human capital as fundamental to value creation. The Company remains committed to developing a skilled, engaged, and high-performing workforce that supports operational excellence, safety, and sustainable growth.

WORKSHOP ON STRATEGIC LEADERSHIP

National Refinery Limited, in collaboration with the Pakistan Institute of Petroleum (PIP), successfully conducted a two-day workshop on Strategic Leadership at our Karachi facility.

This insightful session brought together leaders and professionals to explore key dimensions of strategic thinking, leadership development, and decision-making in today's evolving energy landscape.



NRL LEADERSHIP SERIES – INSPIRING MINDS, SHAPING FUTURES

We initiated the NRL Leadership Series this year – this program was designed to connect our employees with industry leaders, thought influencers, and experienced professionals who bring valuable insights, career wisdom, and industry knowledge.

We had the privilege of hosting Mr. Parvez Ghias, a visionary corporate leader with a remarkable legacy. Mr. Parvez is a Board Member at Engro Corporation and formerly served as CEO of Indus Motor Company and Habib University Foundation, as well as CFO and Vice President at Engro Corp.

The session was packed with deep insight, engaging dialogue, and practical lessons that our teams can apply in their everyday leadership journeys.

NRL LEADERSHIP SERIES – INSPIRING MINDS, SHAPING FUTURES

We also had the pleasure of hosting a knowledge-sharing session by Mr. Arsalan Khan, B.E. (NED), MBA (IBA), currently serving as General Manager at HARISCO Saudi Ltd, having previously worked at Olayan Descon and SABIC. Arsalan's session was an insightful blend of professional development and personal transformation - encouraging participants to reflect, adapt, and grow.



HR CONNECT – PROMOTING LEARNING & INNOVATION

NRL participated in a conference HR Connect, which brought together leaders, HR professionals, and organizational change agents to exchange ideas, share best practices, and explore the evolving role of HR in driving leadership excellence, workforce engagement, and sustainable growth. Through such events, we aim to contribute to the professional welfare of the community by enabling participants to connect, collaborate, and learn from each other, fostering collective growth and a more inclusive, future-ready workforce.



CONTRACTOR'S SAFETY AWARENESS AND INDUCTION

Several sessions on Safety awareness and induction of new contractors were organized at NRL where the importance of safety awareness was provided to contractors with safety guidelines and information on the induction process, enabling them to perform their work safely and efficiently.

The session aimed to equip contractors with the necessary knowledge and skills to carry out their tasks responsibly, reflecting National Refinery Limited's commitment to ensuring a safe working environment for all.



TOOLBOX TALK (TBT) – DAILY SAFETY BRIEFINGS

Daily Toolbox Talk (TBT) sessions are conducted by the HSE Team at the main gate entrance for all contractors. These briefings focus on key safety rules, job-specific hazards, environmental precautions, and lessons learned from recent incidents.

Conducting TBTs at the gate ensures early engagement and 100% coverage of contractors, reinforcing safe behavior from the very start of the workday. This practice strengthens safety culture, improves compliance with HSE requirements, and supports sustainable operations by reducing incidents, preventing environmental harm, and promoting responsible work practices across site activities.



EARTH DAY 2026 – "OUR POWER, OUR PLANET"

In alignment with its sustainability vision and environmental stewardship commitments, National Refinery Limited (NRL) will commemorate Earth Day 2026 under the global theme "Our Power, Our Planet." This theme emphasizes collective responsibility and the transformative power of individual and organizational actions in protecting the environment and ensuring a sustainable future.

As a responsible corporate entity operating in the energy sector, NRL recognizes its role in minimizing environmental impacts while promoting awareness, conservation, and climate resilience. Earth Day activities will be organized across refinery premises and terminal facilities to reinforce environmental consciousness among employees, contractors, and stakeholders.

Key initiatives planned for the occasion include:

Tree Plantation Drive: Expansion of green belt areas within and around refinery premises to enhance carbon sequestration and improve local biodiversity.
Environmental Awareness Sessions: Toolbox talks and interactive sessions focusing on energy conservation, waste minimization, water stewardship, and emission control practices.
Clean-Up Campaign: Housekeeping and waste segregation campaigns to promote responsible waste management and recycling practices.
Energy Conservation Pledge: Encouraging employees to commit to reducing energy consumption both at the workplace and at home.

Through these initiatives, NRL aims to reinforce the message that sustainability is not a one-day activity but a continuous commitment embedded in daily operations. The Earth Day observance will serve as a platform to strengthen employee engagement, promote environmental responsibility, and align organizational practices with national and international sustainability goals.

By embracing the theme "Our Power, Our Planet," NRL reaffirms its dedication to environmental protection, operational excellence, and long-term sustainable growth for future generations.

STEP TOWARDS RENEWABLE ENERGY

The successful installation & commissioning of the 250 kW solar panel system marks a significant milestone in our commitment to sustainable energy transition. The project was completed in accordance with approved safety standards and technical specifications, contributing to a reduction in conventional energy consumption and carbon footprint.

The solar installation is designed to supplement the refinery's power requirements through renewable sources, thereby reducing dependence on conventional grid electricity and lowering greenhouse gas emissions. The system will contribute to operational cost optimization over the long term while enhancing energy efficiency and environmental performance.

This initiative aligns with national renewable energy goals and demonstrates NRL's proactive approach toward climate change mitigation. By integrating solar energy into its operations, NRL reinforces its dedication to responsible resource management, sustainable growth, and environmental stewardship for future generations.

APPRENTICES INDUCTION DATA

Fiscal Year	Chemical	Mechanical	Electrical	Instrument / Electronics	Petroleum	Total
2022 - 2023	87	20	11	38	-	156
2023 - 2024	28	-	-	-	-	28
2024 - 2025	102	44	16	37	11	210
Total	217	64	27	75	11	394

TRAINEES INDUCTION DATA

Fiscal Year	Chemical	Mechanical	Electrical	Instrument / Electronics	Petroleum	Civil	Any other Engineering	Applied Chemistry	Non-Technical	Total
2022 – 2023	**49**	**11**	**12**	**8**	**2**	**2**	**-**	**2**	**4**	**90**
2023 – 2024	**19**	**9**	**7**	**2**	**2**	**0**	**-**	**1**	**1**	**41**
2024 – 2025	**16**	**1**	**3**	**5**	**0**	**0**	**2**	**-**	**1**	**28**
Total	**84**	**21**	**22**	**15**	**4**	**2**	**2**	**3**	**6**	**159**

SUSTAINABILITY PERFORMANCE, GOALS & ROADMAP

1. SUSTAINABILITY PHILOSOPHY & STRATEGIC DIRECTION

NRL's sustainability strategy is embedded within its operational and technical decision-making framework, with a strong focus on resource efficiency, environmental protection, and long-term operational resilience. The Company's approach emphasizes measurable performance improvement through structured initiatives, phased investments, and continuous monitoring rather than declarative commitments.

Sustainability considerations are integrated into refinery operations, asset integrity management, and future project planning to ensure that environmental and energy performance improvements remain aligned with business continuity, regulatory compliance, and operational reliability.

2. WATER STEWARDSHIP & CIRCULAR WATER MANAGEMENT

The Effluent Treatment Plant (ETP) is operated in full compliance with applicable Environmental Protection Agency (EPA) discharge standards and has a design capacity of approximately 400,000 Imperial Gallons per Day (IGPD). The treated effluent consistently meets regulatory discharge requirements; however, elevated Total Dissolved Solids (TDS) currently limit its reuse for internal process applications.

NRL is transitioning from a discharge-based wastewater management approach to a circular water utilization model, aimed at reducing fresh water withdrawal and external water dependency.

Water Sustainability Targets

Focus Area	Target	Time Line
Fresh water Consumption	25–30% reduction from 2024 baseline	By 2030
Treated effluent reuse	≥60% internal reuse via RO system	By 2027
Bowser water dependency	Progressive reduction	2025–2030

Key enabling initiatives include the technical evaluation of Reverse Osmosis (RO) for tertiary treatment of ETP effluent and planned reuse of treated water in boiler feed water and steam generation systems. These initiatives directly support water conservation, circular resource use, and long-term sustainability objectives.

3. ENERGY EFFICIENCY & RESOURCE OPTIMIZATION

Energy efficiency is a key pillar of NRL's sustainability roadmap. Structured preventive and turnaround maintenance programs are implemented to minimize performance degradation due to fouling, mechanical wear, and hydraulic limitations, thereby reducing avoidable energy losses.

Performance monitoring frameworks enable early identification of inefficiencies and timely corrective actions, supporting stable and efficient unit operation across refinery processes.

ENERGY & RESOURCE EFFICIENCY COMMITMENTS

Area	Commitment	Target Year
Energy intensity	10% reduction from 2024 baseline	2030
Operational losses	Progressive reduction through optimization	2025–2030
Equipment efficiency	Sustained improvement through rehabilitation & monitoring	Ongoing

These measures establish a strong technical foundation for long-term energy optimization and emissions intensity reduction.

4. Strategic Studies Supporting Sustainability

NRL has engaged independent technical consultants, including M/s: Wood, to carry out strategic studies aimed at enabling the refinery to become self-sufficient in Euro-V compliant products while upgrading lower-value product streams into higher-value products through process optimization and configuration improvements. These studies focus on identifying medium- and long-term opportunities to enhance refinery flexibility, product slate optimization, and sustainability performance The scope of the studies includes assessment of existing unit configurations, hydraulic and operational constraints, debottlenecking potential, and future integration opportunities required to support Euro-V production capability and value maximization.

SUSTAINABILITY IMPACT

- Progress toward self-sufficiency in Euro-V compliant products
- Conversion of lower-value products into higher-value products, improving overall refinery yield structure
- Reduction in energy and material losses associated with reprocessing and blending
- Improved long-term energy efficiency and emissions intensity
- Alignment of future investments with NRL's sustainability and ESG objectives

5. PROCESS OPTIMIZATION PROJECTS WITH SUSTAINABILITY IMPACT

NRL is implementing and evaluating a series of process optimization initiatives designed to enhance operational efficiency, improve product quality, and reduce the environmental footprint of refinery operations. These initiatives focus on maximizing value recovery from existing assets, minimizing reprocessing and energy losses, and supporting compliance with evolving fuel quality and environmental standards.

Sustainability Impact

- Improved energy efficiency through optimized unit operation and reduced specific energy consumption
- Enhanced resource utilization and yield optimization, reducing material losses and reprocessing
- Support for long-term sustainability planning through identification of future efficiency and optimization projects

5.1 Naphtha Block Study

The current naphtha processing configuration splits total naphtha into light and medium naphtha streams. Elevated sulphur levels in the medium naphtha stream present challenges in meeting Euro-V gasoline specifications.

The Naphtha Block Study evaluates process modifications to enable effective hydrotreating of both light and medium naphtha streams. The objective is to significantly reduce sulfur content, improve feed flexibility, and enhance gasoline pool quality.

Sustainability Impact

- Improved compliance with Euro-V fuel quality standards
- Reduction in sulfur-related emissions
- Improved utilization of existing hydrotreating capacity
- Reduced corrective blending and reprocessing

5.2 TRAY STUDY OF CDU

A dedicated tray study is being undertaken for the Crude Distillation Unit (CDU) to enhance separation efficiency and increase recovery of valuable fractions. The study evaluates existing column internals, tray hydraulics, operating limitations, and vapor-liquid contact efficiency.

Proposed tray enhancements aim to improve cut-point control, fraction purity, and yield optimization without increasing crude throughput.

Sustainability Impact

- Lower furnace duty per barrel processed
- Improved recovery of high-value fractions
- Reduction in specific energy consumption
- Enhanced process stability and operational reliability

5.3 MEK Unit Optimization

NRL is optimizing the MEK Dewaxing Unit with the objective of reducing oil content in slack wax to below 10%. The initiative includes detailed review of operating conditions, solvent ratios, cooling profiles, filtration performance, and control strategies.

Improved process control will enhance product consistency, reduce yield losses, and minimize reprocessing requirements across different lube grades.

Sustainability Impact

- Improved material efficiency and yield optimization
- Reduced energy consumption due to lower reprocessing
- Enhanced product quality and consistency
- Better utilization of solvents and utilities

5.4 VACUUM DEHYDRATOR SKID

The vacuum dehydrator skid trial for lube base oils has been successfully completed. Following the successful completion of the vacuum dehydrator skid trial for lube base oils, which demonstrated effective moisture reduction and compliance with required product quality specifications, NRL has proceeded with procurement of the skid for permanent installation.

The permanent installation of the vacuum dehydrator skid is intended to ensure consistent moisture control in lube base oils specially 65 NHVI, enhance product quality stability, and reduce the incidence of off-spec production. This modification will minimize reprocessing requirements and associated energy consumption, while improving overall process reliability and operational efficiency.

Key Impact

- Improved lube base oil quality and consistency
- Reduced off-spec production and reprocessing
- Lower energy and utility consumption
- Enhanced operational reliability through permanent installation

5.5 OVERALL CONTRIBUTION OF PROCESS OPTIMIZATION PROJECTS

Collectively, these initiatives support NRL's sustainability objectives by improving energy efficiency, enhancing resource utilization, reducing environmental footprint, and strengthening long-term operational resilience.

6. Future Commitments & Roadmap (2025–2030)

NRL's sustainability roadmap for 2025–2030 focuses on measurable and achievable improvements across environmental, energy, and safety performance domains.

Key Commitments

- 10% reduction in GHG intensity by 2030
- Progressive water circularity through reuse initiatives
- Zero-fatality workplace target through strengthened HSE systems
- Increased digitization and automation for operational efficiency and monitoring

SUSTAINABILITY PERFORMANCE, GOALS & ROADMAP

7. SUSTAINABILITY PERFORMANCE INDICATORS (KPIS)

NRL is strengthening sustainability performance management through defined Key Performance Indicators (KPIs) to support baseline establishment, trend analysis, and data-driven decision-making.

Key Performance Indicators (KPIs)

KPI	Unit	2024	2025	Trend Reduced / Improved
Total Energy Consumption	GJ	10,177.20*10^5	9922.97*10^5	(254.24*10^5)
Losses	M.TON	31,164	30384.9	(779.1)
Water Consumption	m^3	1,781,497.20	1,736,960	(44,537.2)
Waste Recycled	m^3	622,440	638,001	15,561

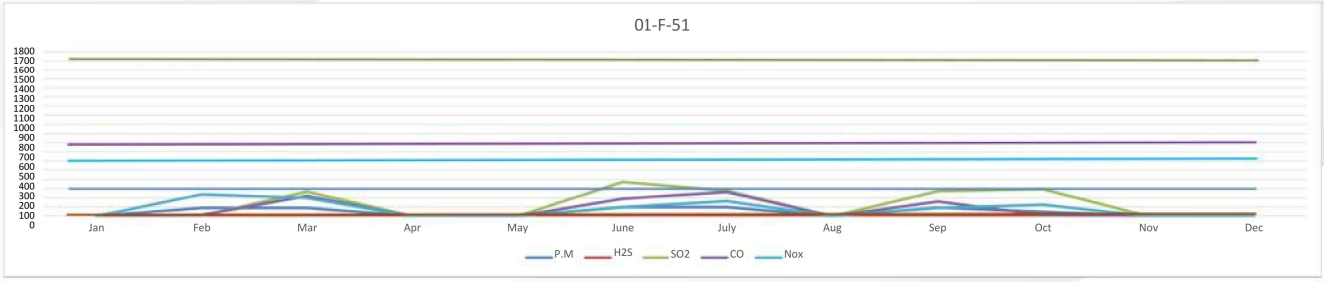
8. Conclusion & Way Forward

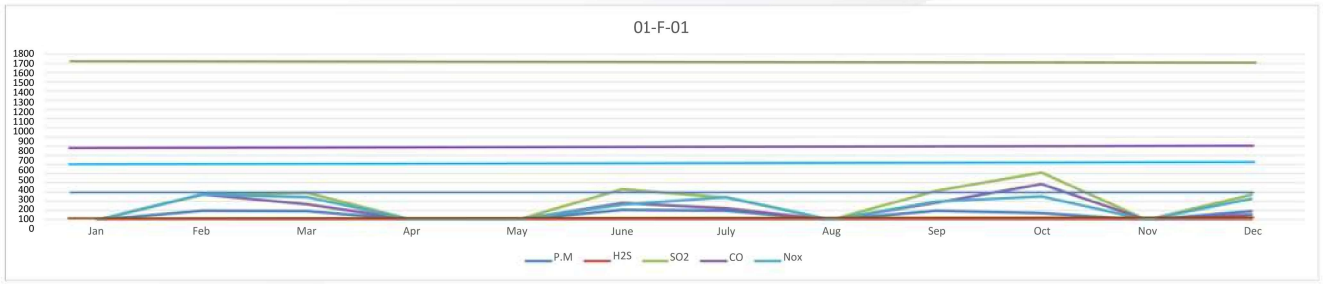
NRL's sustainability journey is evolving from compliance-driven operations to a target-oriented, performance-based framework. Defined goals, structured initiatives, and phased implementation plans provide a credible and achievable pathway toward enhanced environmental performance and long-term operational sustainability.

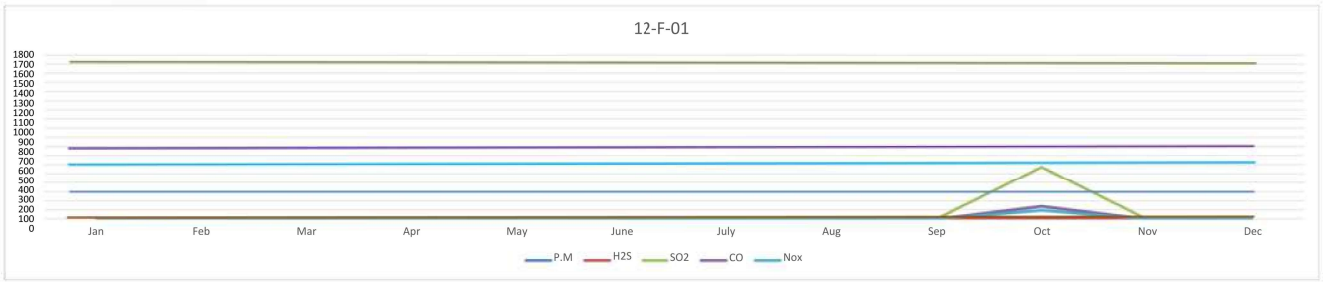
The focus remains on technically sound, practically implementable initiatives that deliver measurable sustainability benefits while supporting refinery reliability and business continuity.

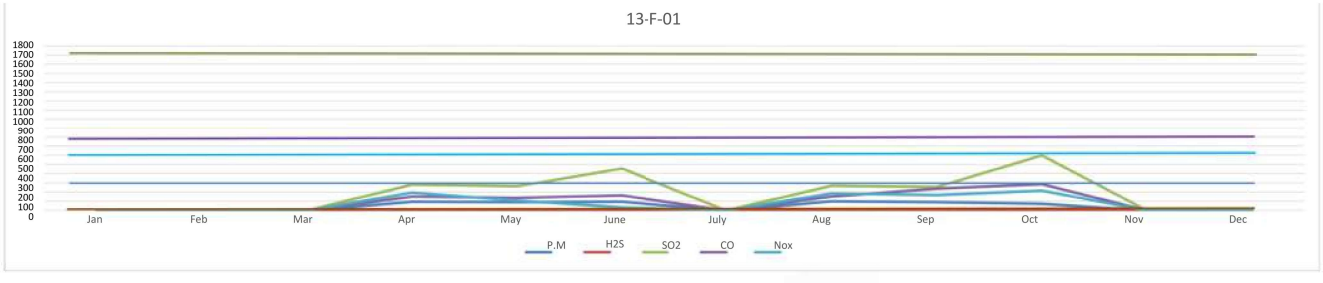
ENVIRONMENTAL REPORTING COMPLIANCE

STACK EMISSION TESTING





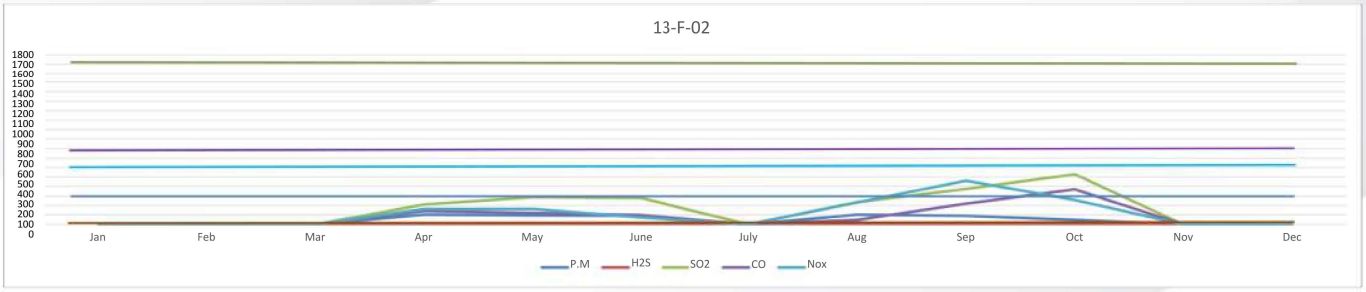


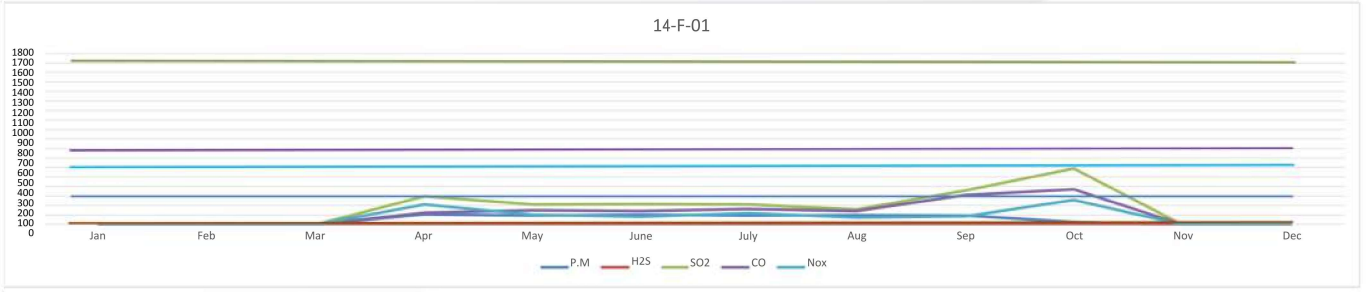


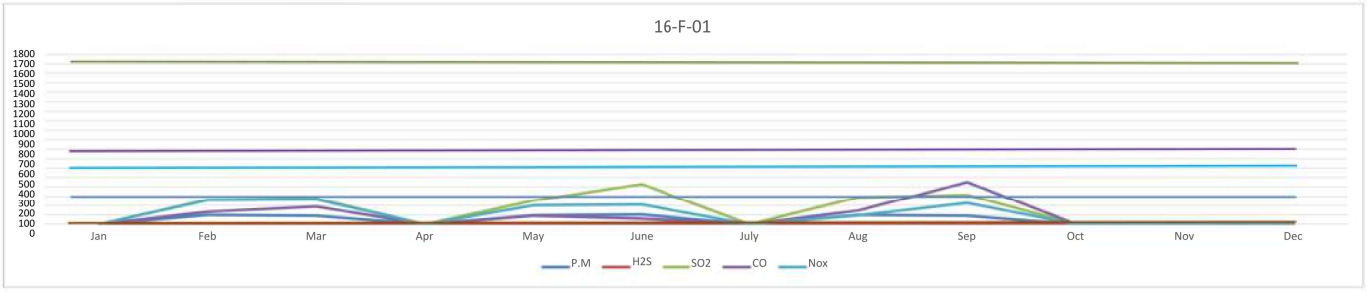
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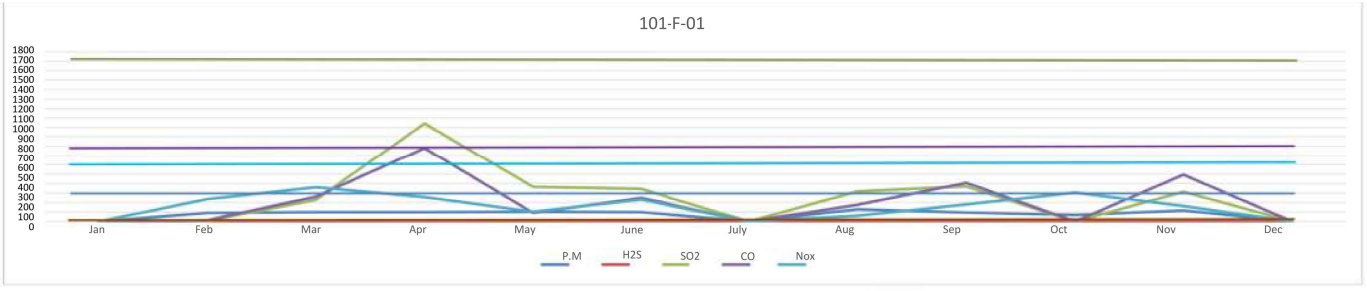
ENVIRONMENTAL REPORTING COMPLIANCE

STACK EMISSION TESTING





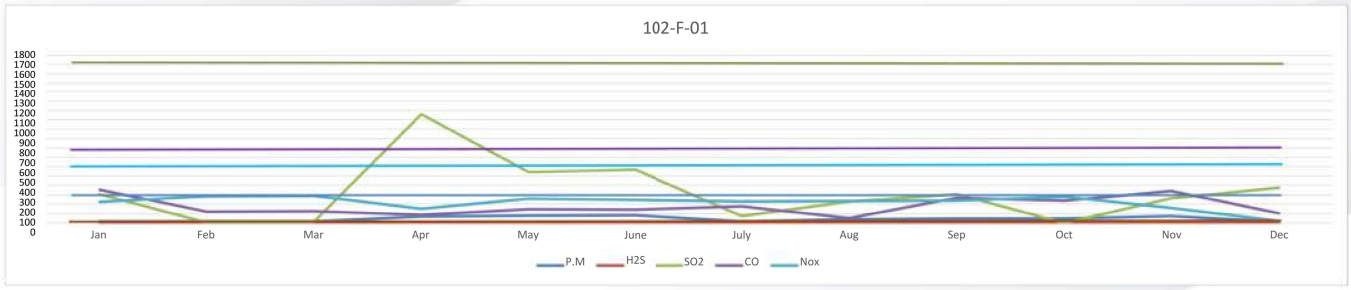


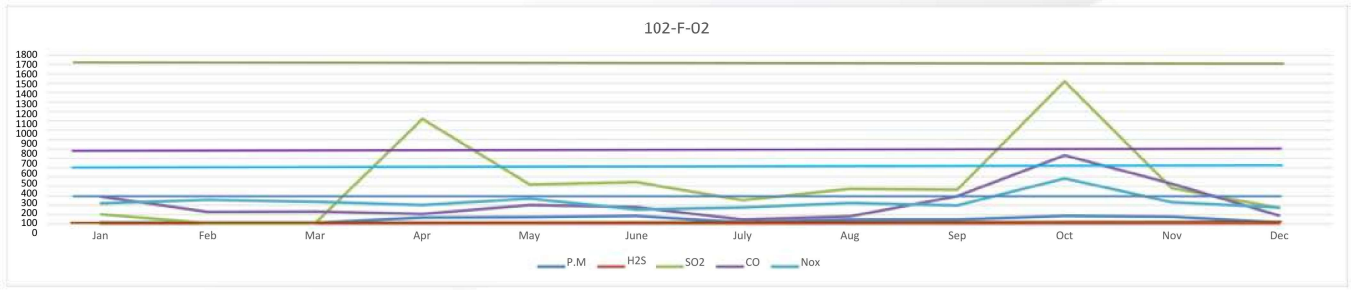


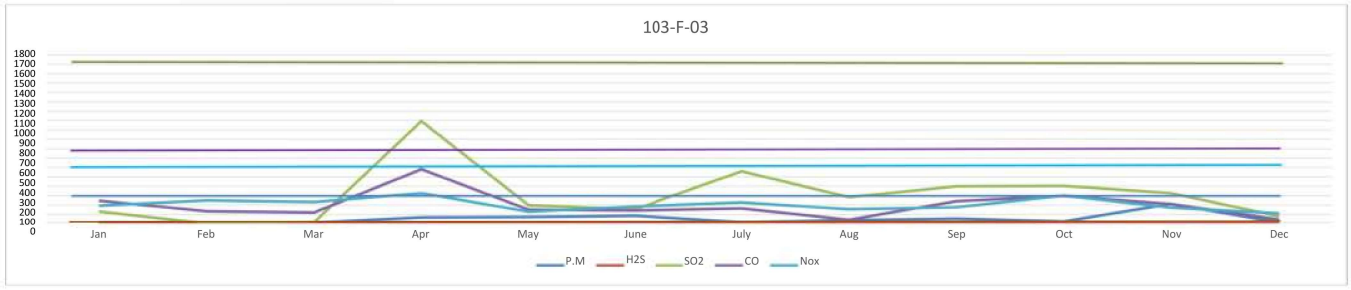
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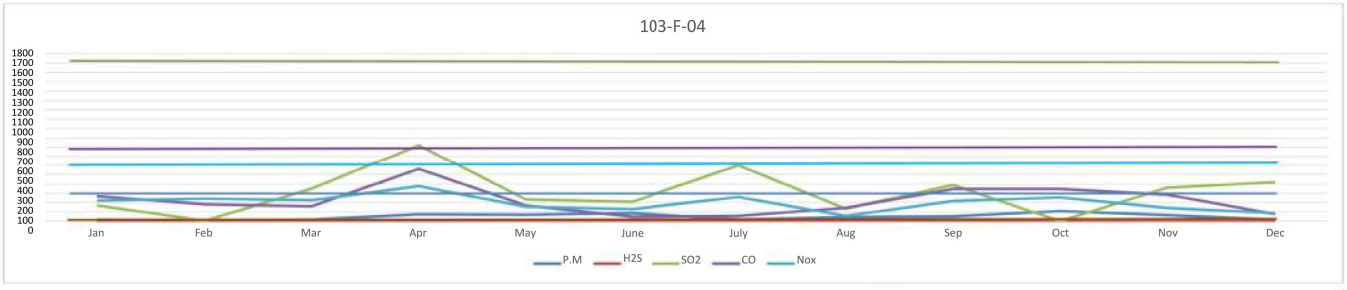
ENVIRONMENTAL REPORTING COMPLIANCE

STACK EMISSION TESTING





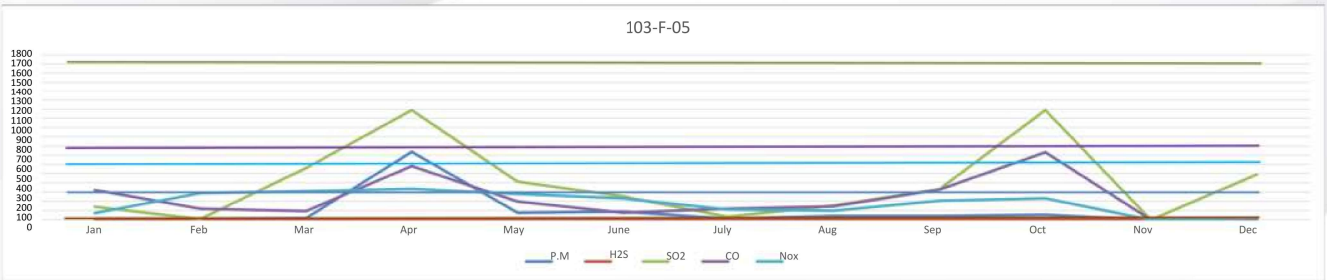


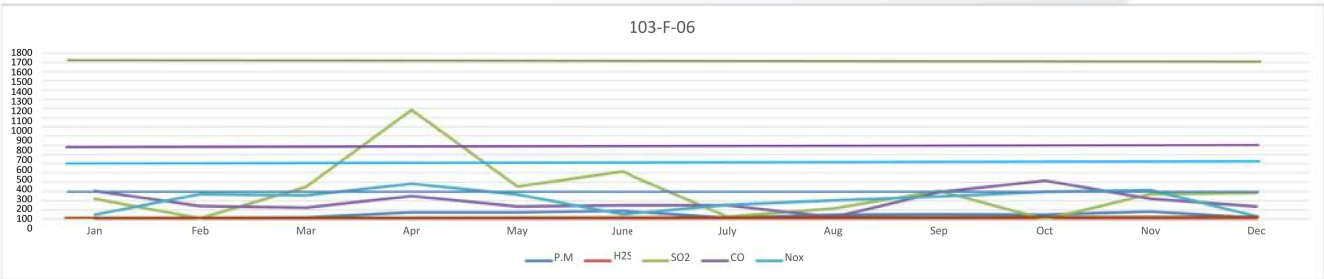


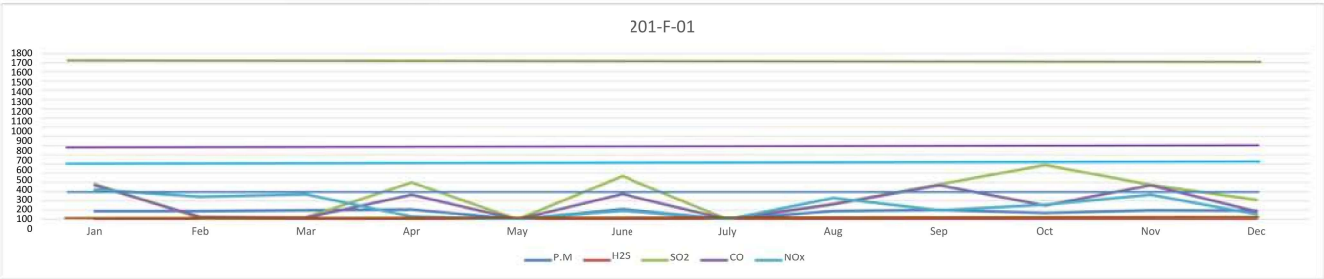
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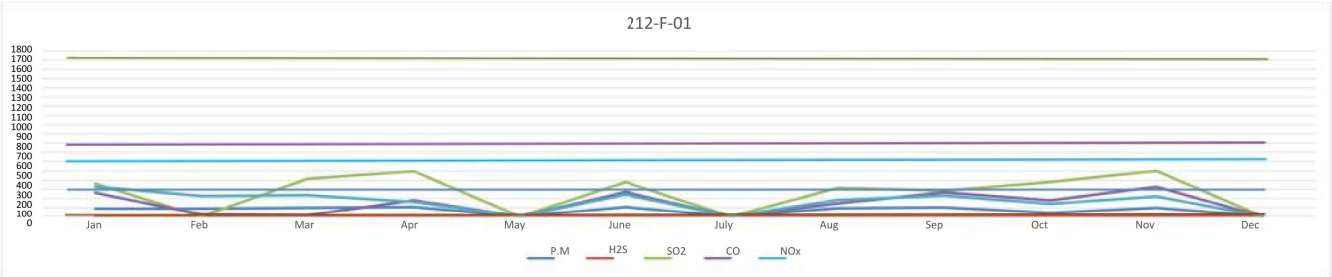
ENVIRONMENTAL REPORTING COMPLIANCE

STACK EMISSION TESTING





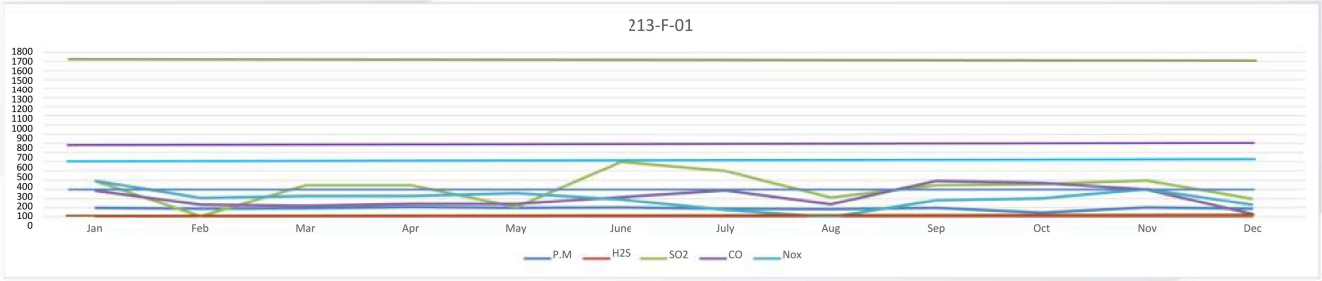


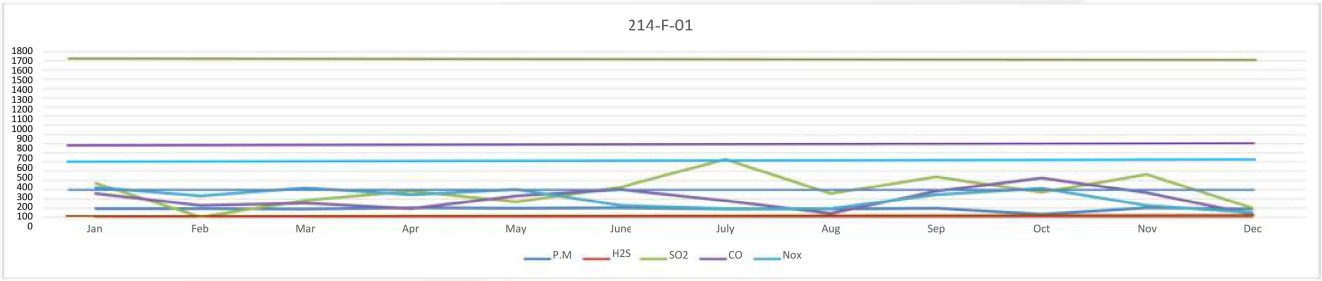


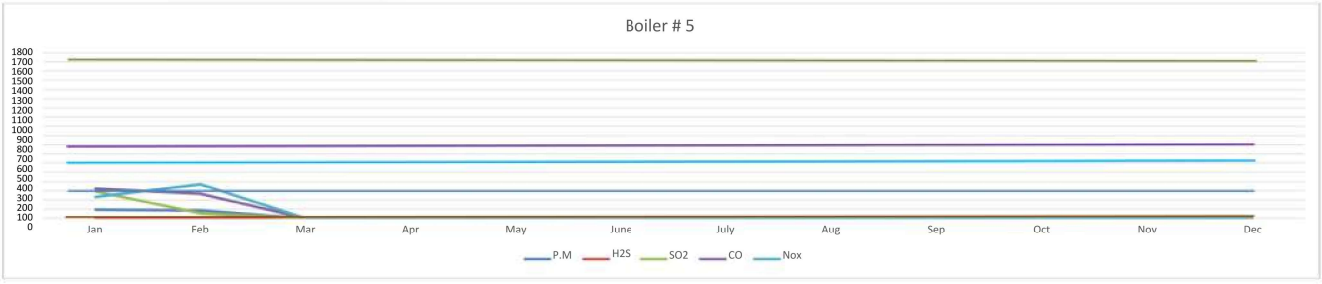
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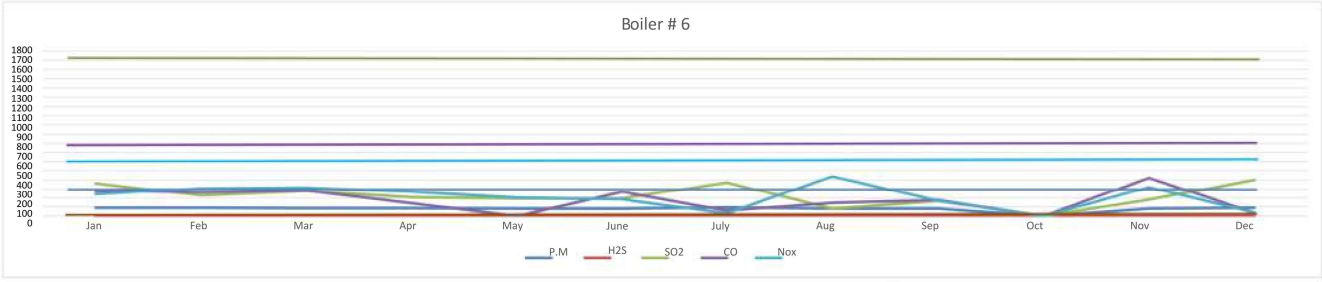
ENVIRONMENTAL REPORTING COMPLIANCE

STACK EMISSION TESTING





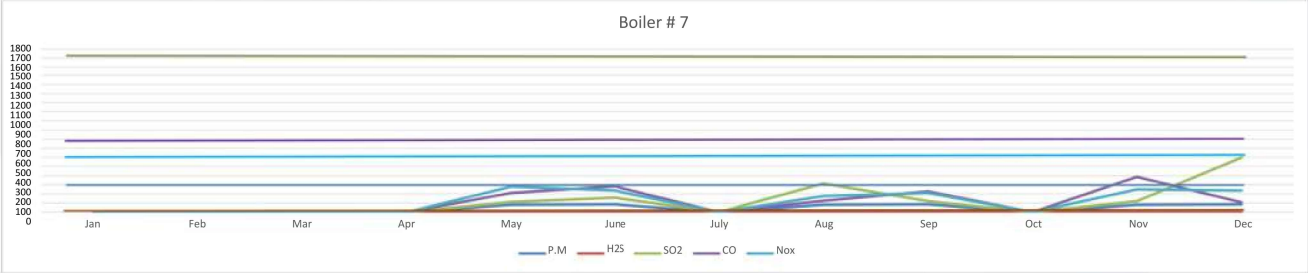


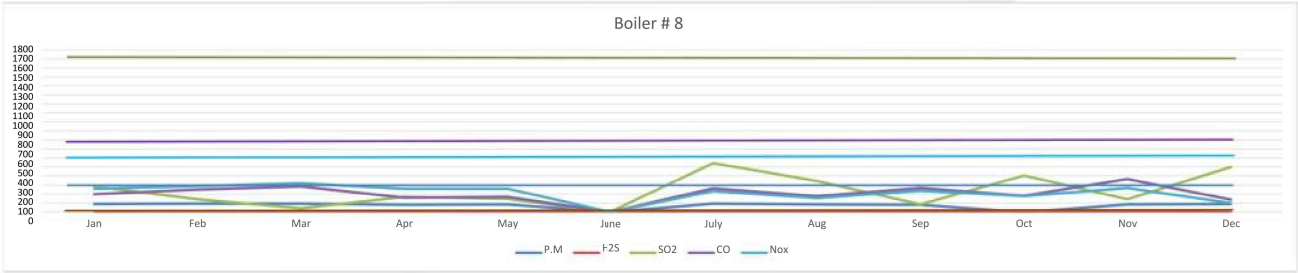


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ENVIRONMENTAL REPORTING COMPLIANCE

STACK EMISSION TESTING

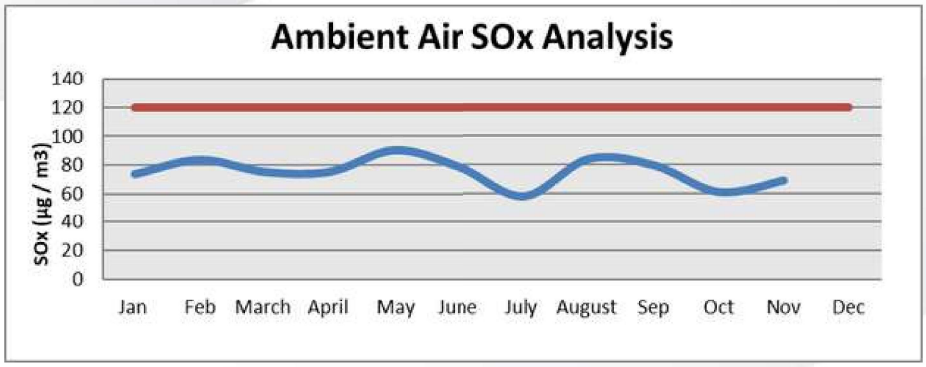


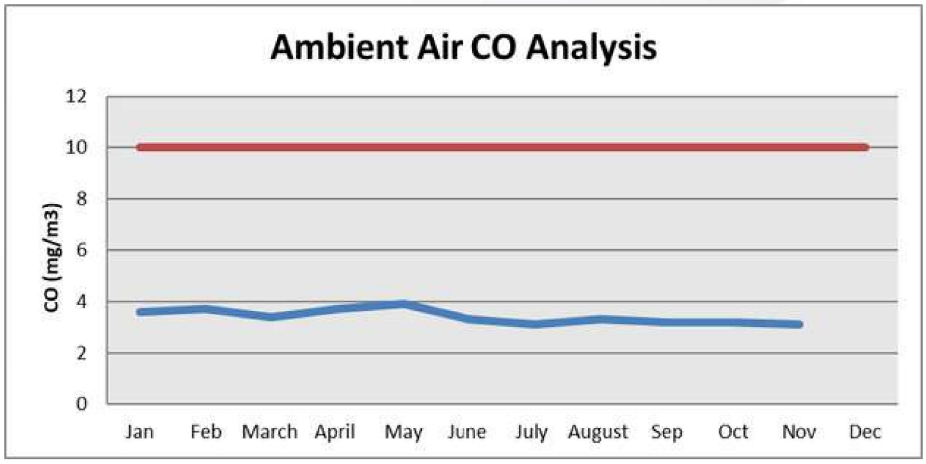


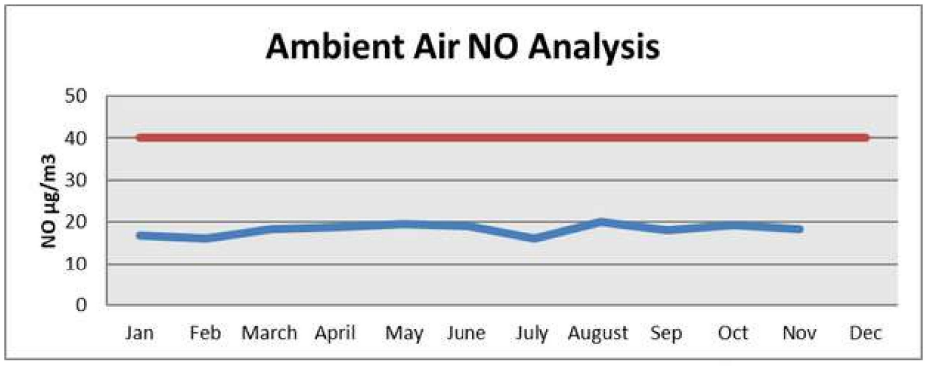
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ENVIRONMENTAL REPORTING COMPLIANCE

AMBIENT AIR MONITORING

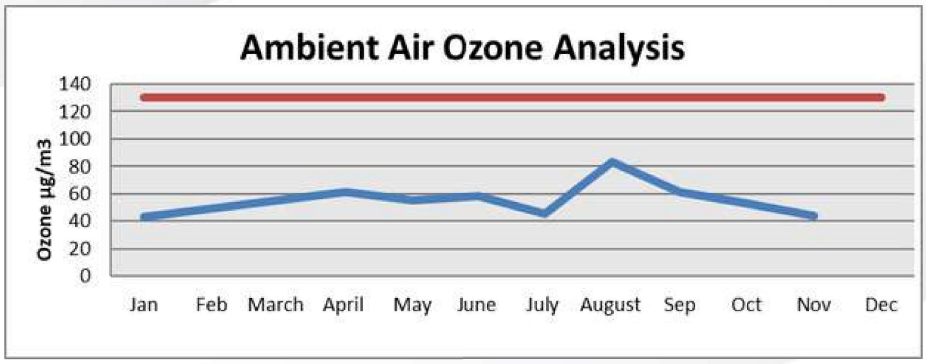


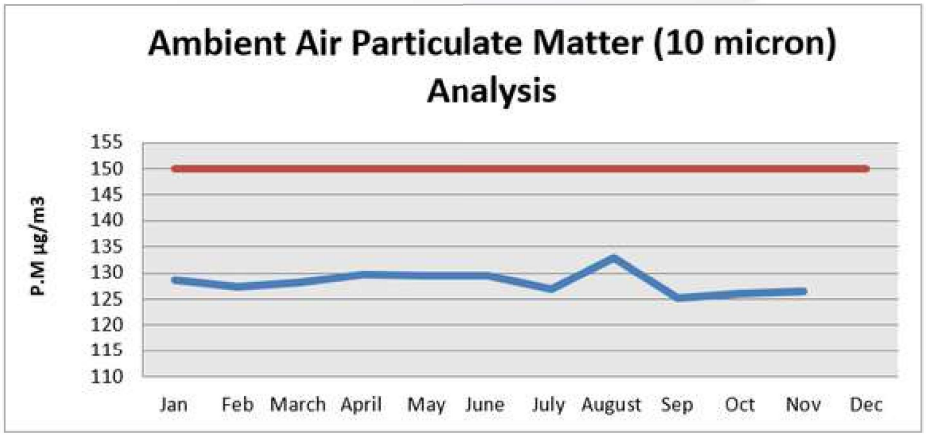


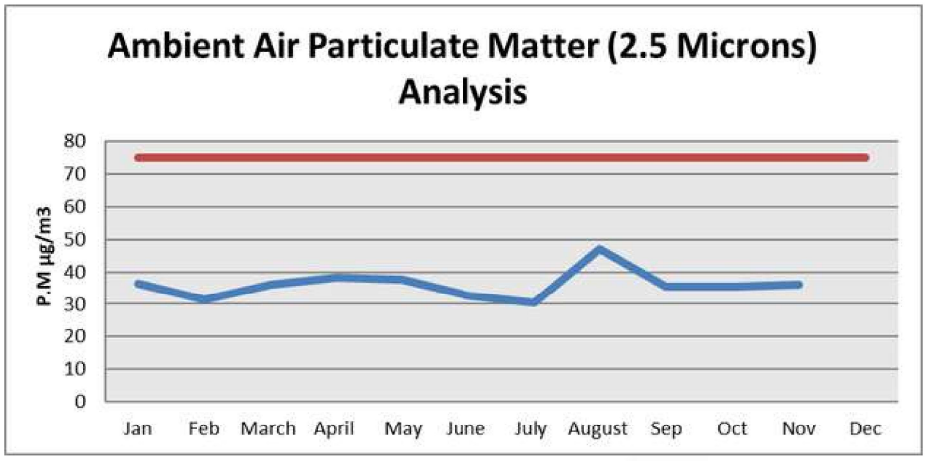


ENVIRONMENTAL REPORTING COMPLIANCE

AMBIENT AIR MONITORING

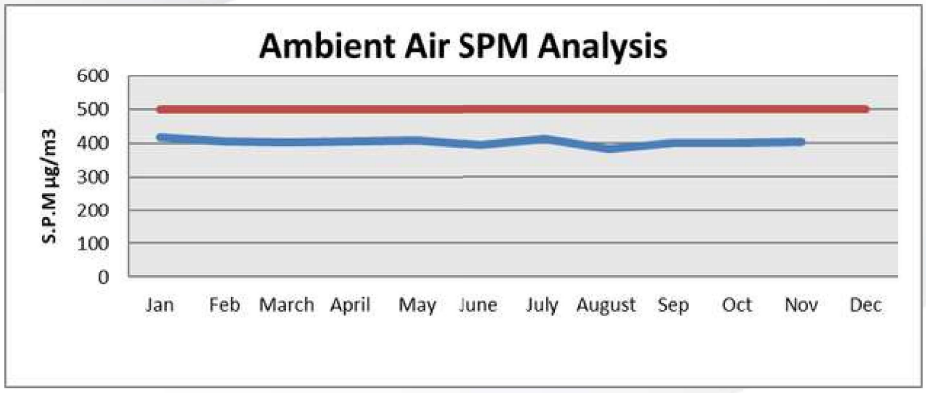


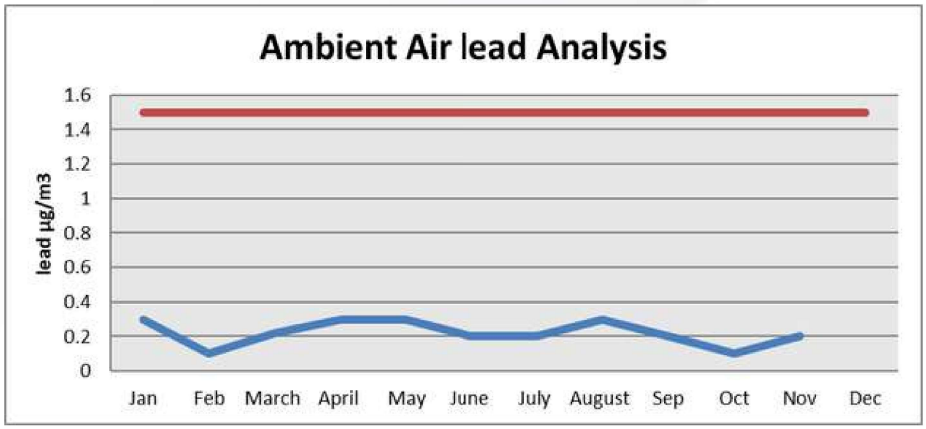


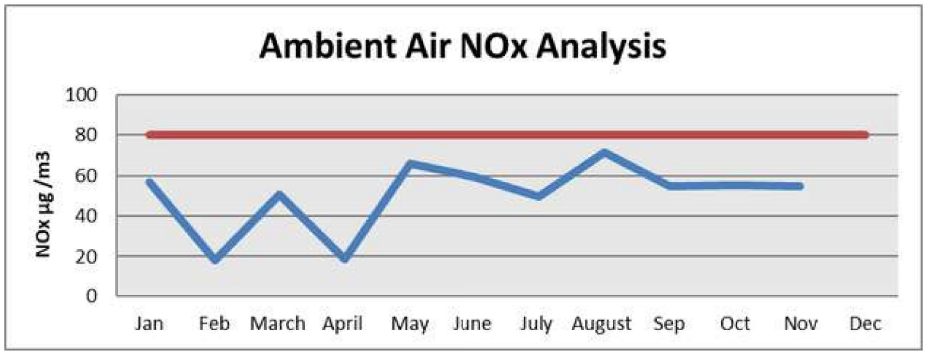


ENVIRONMENTAL REPORTING COMPLIANCE

AMBIENT AIR MONITORING

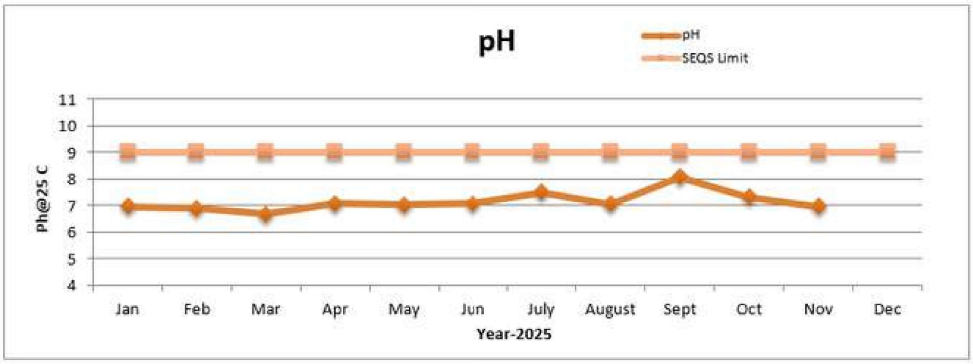


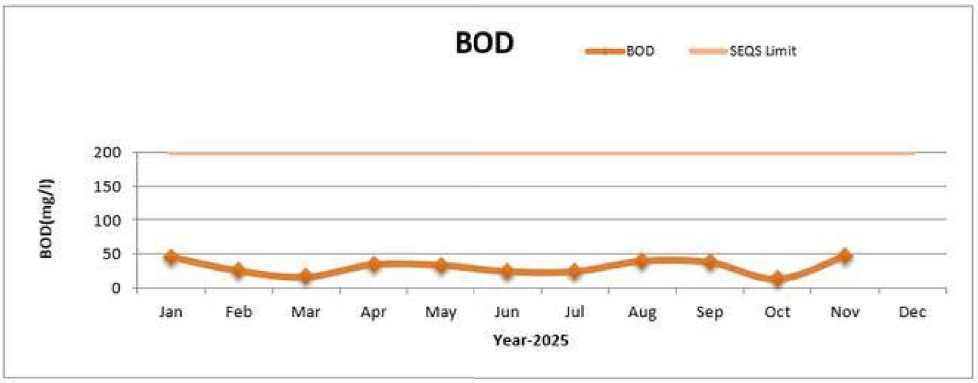


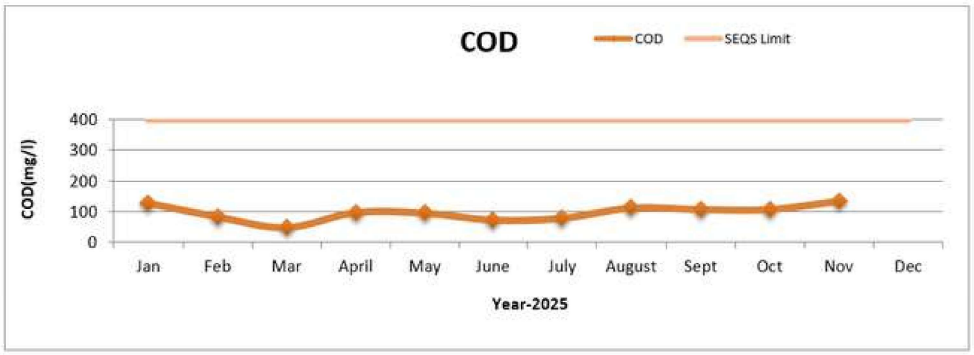


ENVIRONMENTAL REPORTING COMPLIANCE

EFFLUENT TESTING

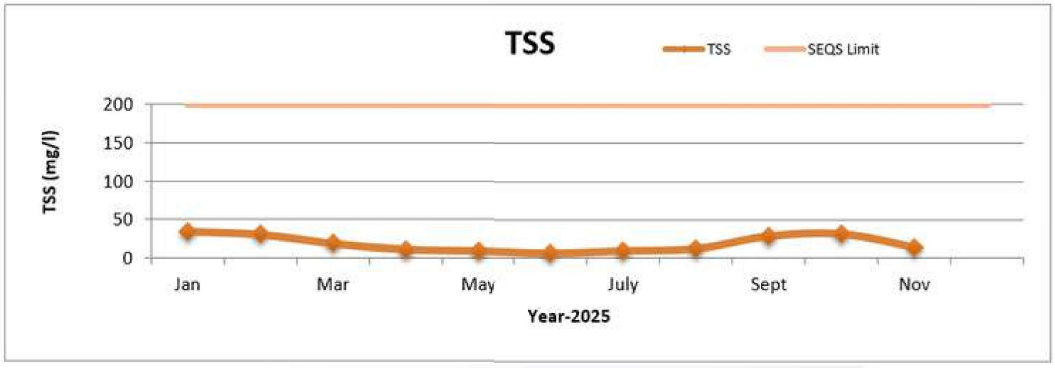


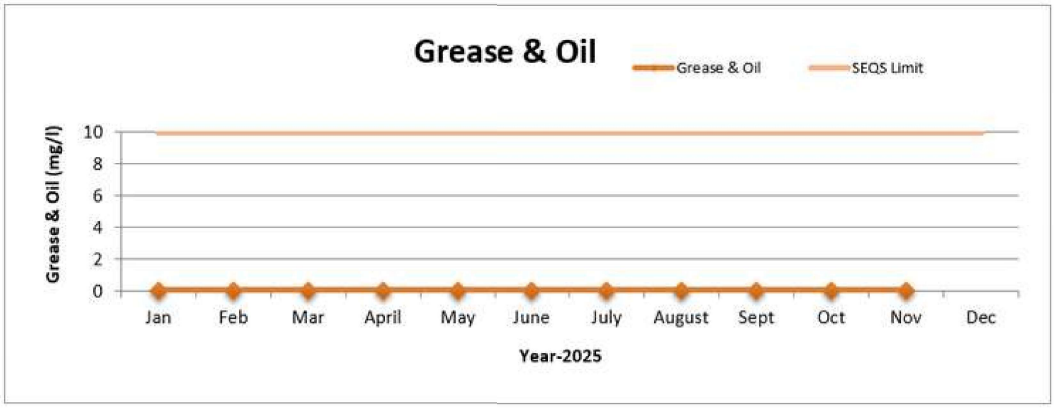


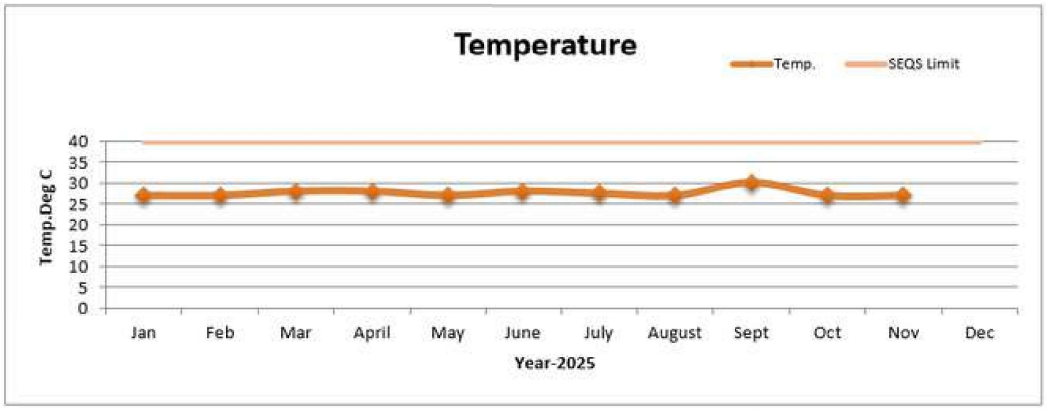


ENVIRONMENTAL REPORTING COMPLIANCE

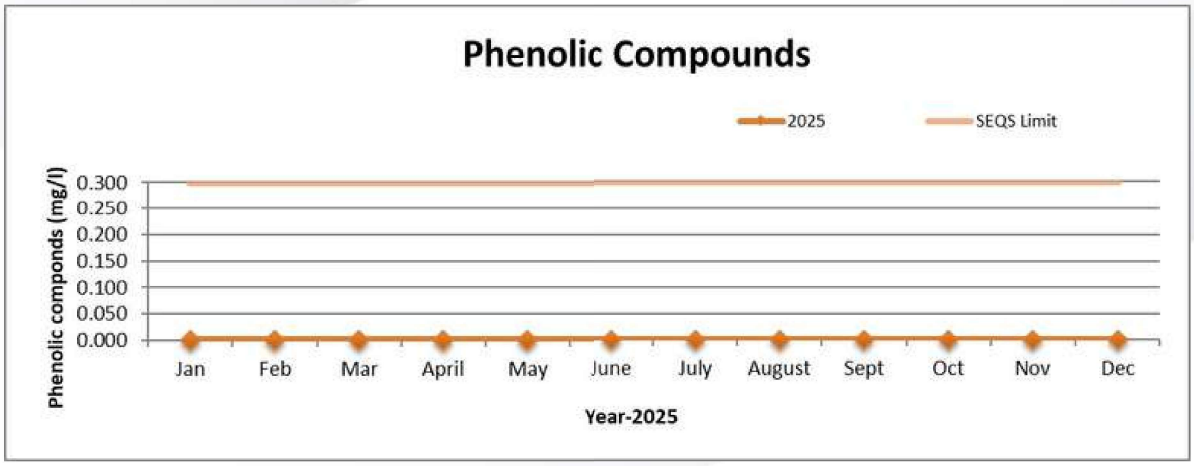
EFFLUENT







EFFLUENT


Phenolic Compounds
2025
SEQS Limit
Phenolic componds (mg/l)
0.300
0.250
0.200
0.150
0.100
0.050
0.000
Jan
Feb
Mar
April
May
June
July
August
Sept
Oct
Nov
Dec
Year-2025

ENVIRONMENTAL REPORTING COMPLIANCE

DRINKING WATER QUALITY MONITORING – REGULATORY COMPLIANCE

In compliance with the Sindh Environmental Protection Act, 2014, National Refinery Limited (NRL) conducts monthly drinking water quality testing through SEPA-recognized/approved laboratories. A total of five (05) drinking water samples are collected and analyzed on a regular basis from designated locations across the facility.

This monitoring ensures the provision of safe and potable drinking water for employees and contractors, safeguarding occupational health and wellbeing. From a sustainability perspective, routine water quality testing supports social sustainability by protecting workforce health and environmental governance by ensuring adherence to regulatory requirements and best practices in environmental management.

Continuous monitoring and timely corrective actions, where required, reflect NRL's commitment to responsible operations and compliance with provincial environmental legislation.

GLOSSARY

LR1	Lube-I Refinery	AWT	Awareness, Training and Competence
FRE	Fuel Refinery	CAC	Communications, Consultation and Participation
LR2	Lube-II Refinery	MAM	Calibration, Monitoring and Measurement
OKR	Oil Movement	EVC	Evaluation of Compliance
NAP	Naphtha Block	AUD	Internal Audit
SRU	Sulphur Block	EPR	Emergency Preparedness and Response
DHB	Diesel Hydro Treating Block	TRR	Tracking of Regulations and other Requirements
OKT	Keamari Terminal	AAP	Agency Approvals for EMS & OHSAS
UT1	Utilities	OCP	Operational Control
FPR	Fire Protection	CCP	Contractor Control
MT1	Maintenance (Rotary)	AIA	Environmental Aspects & Impacts Analysis
TLW	Turnaround Planning / Local Manufacturing	EOT	Environmental Objectives, Targets and Management Programs
MT3	Maintenance (Stationary)	HRA	Occupational Health & Safety Hazards Identification and Risks Assessment
MT2	Electrical & PG	HUR	Human Resource
HSE	Health Safety & Environment	OTM	Occupational Health & Safety Objectives and management Program
TSR	Technical Services	RIP	Review of (HSEQ) Identified Projects
QCL	Quality Control	NCR	Control of Non-Conforming Product
PPE	Production Planning & Economics	QOB	Quality Objectives, Targets and Analysis of Data
PRJ	Project	CO2	Carbon Dioxide
CON	Contract	Db	Decibel-unit for measuring noise level
ENG	Engineering	EPA	Environmental Protection Agency- Govt. of Pakistan

GLOSSARY

INS	Instrumentation & Control	MBL	Management Block
DIS	Dispensary	IGPD	Imperial Gallons Per Day
ISP	Inspection	LTI	Lost Time Injury
SMS	Shipping, marketing & Sales	MR	Management Representative
STR	Supply & Trade Relation	MSDS	Material Safety Data Sheet
WHS	Ware House	SEQS	Sindh Environment Quality Standards
IMP	Import	NOx	Oxides of Nitrogen
LRU	Local Purchase	SOx	Oxides Sulphur
ITS	Information Technology & System	OH&SMS	Occupational Health Safety Management System
LCA	Legal & Corporate Affairs	OHSAS	Occupational Health and Safety Assessment Series
PER	Personnel	MRM	Management Review Meetings
SCY	Security	DDC	Document Data Control
SPR	System Procedures	SRR	Structure, Roles, Responsibilities and Accountabilities

FEEDBACK FORM

The performance evaluation data sheet assistus for further improvement regarding any aspect for this report.

You are requested to fill the questionnaire for each statement, please indicate your responsewith the respective ratinggiven below and add your valuablecomments / suggestions where appropriate.

SA = Strongly Agree, A = Agree, N = Neutral,D = Disagree, SD = Strongly Disagree

S. #		SA	A	N	D	SD
1	Reporting mechanism and presentation					
2	Understandability, readability, accessibility					
3	Completeness					
4	Credibility & communication					
5	Comprehensive navigation					
6	Integration with financial statements					
7	Environmental performance					
8	Compliance & no-compliance record					
9	Management commitment including environmental occupational Health & Safety vision, strategy and related policies.					
10	Application of guidance or standard					

Comments / Suggestions

Many thanks for your time in answering these questions. Your answers / input will play a significant role in improvement of over future report.

Please Forward to
Manager HSE
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Korangi Industrial Zone, Korangi-Karachi
E-mail: mustafa.hussain@nrlpak.com
Phone No. 92-21-5064981-87
Ext: 2559 / 2358

Your Name: _____
Your Designation: _____
Organization: _____
Email: _____