

# Indorama Security Management Plan

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## 1.0 INTRODUCTION

### 1.1 Indorama Complex

Indorama complex is a leading petrochemicals and fertilizer manufacturing company located at Eleme, Port Harcourt – Nigeria. It is spread over 400 acres of land and houses a full-fledged Petrochemical and Nitrogenous Fertilizer manufacturing plant. The Petrochemical unit consists of Olefins, Polypropylene / Butane and Polyethylene manufacturing facility while the Fertilizer unit consists of Ammonia, Urea synthesis and Product Handling facility. The manufacturing plants are supported by a captive power plant, utilities, ETP, storage tanks, bagging warehouse and other facilities.

The complex also houses residences for management and operating staff with for round the clock operations.

While the petrochemical facility is in operation since 1996 the fertilizer plant is a new addition and has been in operation since 2016.

A PET plant also is in operation since 2012.

### 1.2 Project Overview and Description

It is proposed to set up an Ammonia-Urea fertilizer plant within the existing Indorama Complex. This shall be in addition to the current fertilizer unit as part of company's expansion plan.

The proposed Ammonia and Urea plant capacity shall be 2300MTPD and 4000MTPD respectively. Utilities shall be supplied from current operations set up with a slight increase in the capacities.



The components of the Project are:

- Steel structures movement and fabrication
- Heavy equipment and process vessels
- Mobilization and construction vehicles
- Project and operation interface
- Contract workforce for project
- Contract expatriate accommodation
- Road access

This Security Management Plan (SMP) applies to all activities undertaken within the Indorama Complex for regular operations and construction of the Project thereof.

## **2.0 OBJECTIVES, MISSION AND APPROACH OF COMPANY SECURITY**

Indorama is committed to constructing the Project in a manner that protects worker and public as its security concern. The Project shall be constructed in accordance with applicable laws, regulations, as laid down by the Federal Ministries and strictly abide by the 'law of the land'

### **2.1 Security Policy**

We at Indorama Nigeria are committed to ensure the business continuity of the companies within this complex, create a safe and secure work environment for employees, associates and assets as well as to communities, through:

- Regular assessment of security threats to business operations and manage the associated risks to eliminate or reduce them to manageable level.
- Ensuring that appropriate security measures are in place such that we do not expose employees to significant risk.
- Ensuring that appropriate response procedures are in place to minimize the impact of any security incident or emergency.
- Record, analyze and training of security operatives / personnel for enabling them to effectively discharge their duties.
- Continual review & improvement investigate all reported security incidents directly involving our business operations or employees to develop improvements to prevent their recurrence.
- Continual education of security objectives, plans, procedures and practices for attainment of highest level of operational efficiency and plant performance.

- Developing contingency plans and measures for emergency relating to potential security incidents.
- We shall not employ armed security unless there is no acceptable or practical alternative to manage the risk.
- Comply all legal & other requirements of organization.

## **2.2 The Approach**

Indorama's security approach is based on respect for people and human rights, and is guided by the Voluntary Principles on Security and Human Rights. These Principles are integrated into our Security Policy, and all working at site endeavor to follow them. Indorama strives to be a good partner and we value our reputation as a good corporate citizen that engages and supports local communities. These relationships are important on many levels, including establishment of a calm, secure environment for our operations.

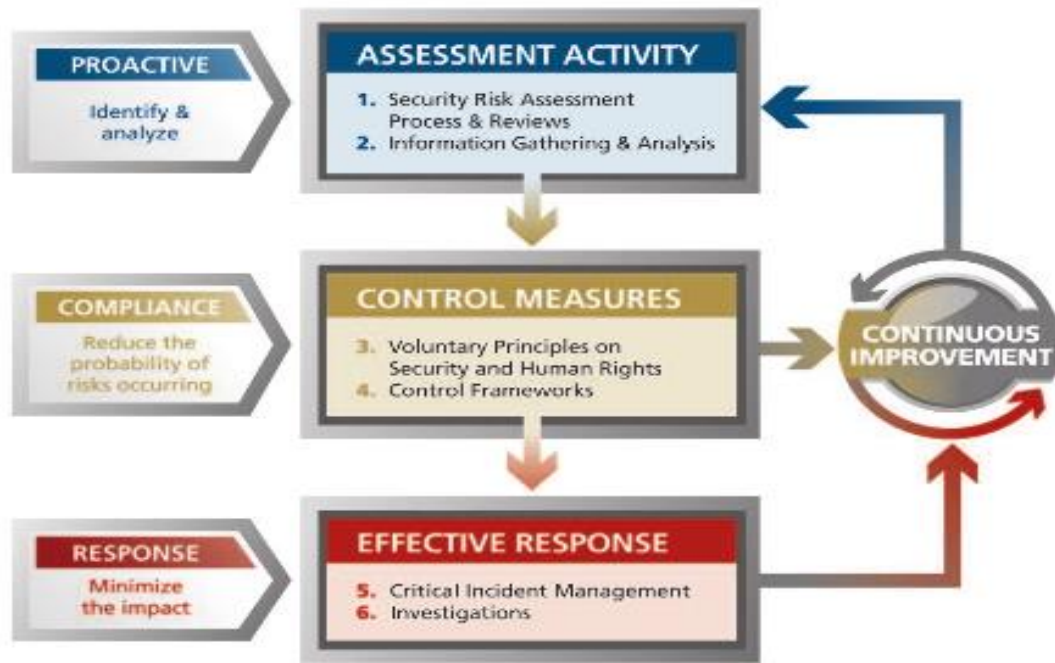
Security and safety of our people are foremost. Indorama has numerous proactive programs to protect people, ranging from stringent access controls at sites to specialized training for personnel on how to avoid security risks while traveling or working in remote locations. We encourage all individuals in the organization to take responsibility for their own security, and we empower them to play a role.

Safeguarding the company's products and assets is fundamental to preventing losses and protecting shareholders' interests. Our security program has established best practice standards for the protection of our personnel and other materials, and we are continuously reviewing and improving these standards.

The Indorama Security Management System enables our company to manage and respond to security challenges wherever we operate. We are committed to a proactive program using the best protection measures available to keep everyone and everything safe and secure.

## **2.3 Security Philosophy and Standards**

The philosophy of Indorama Security Management system is depicted below.



Essentially, it is based on proactive management with physical and administration controls at place. This is followed by compliance to check the efficacy of measures implemented.

Subsequently, the gaps that are visible are corrected with corrective measures. It is to be noted that all the system elements are subjected to continual improvement on iterative basis.

### 3.0 OVERVIEW OF SECURITY SITUATION

The security situation at Indorama Site is by and large peaceful with no major untoward incidents reported at site. This has been possible due to seamless transition from erstwhile Nigerian National Petrochemicals Corporation (NNPC) management to Indorama management by virtue of addressing all the issues with tangible solutions duly implemented.

The community has played a very important role in this transition and has always been a core strength of Indorama's growth success story.

The Indorama management has been instrumental in charting of various Corporate Social Responsibility (CSR) activities that were appreciated and acknowledged by the communities. This was a great measure to alleviate the argumentative attitude among workers since they were indirect beneficiaries from the schemes.



#### 4.0 PHYSICAL SECURITY

The security management system at Indorama Complex is divided in three (03) strata namely:

- Core security team led and managed by ex-servicemen at all levels
- Colonel from Nigerian Police, Army, State Security Services & Explosive Ordnance Department (EOD) securing the complex.
- Contract security staff reporting to Indorama Security Management

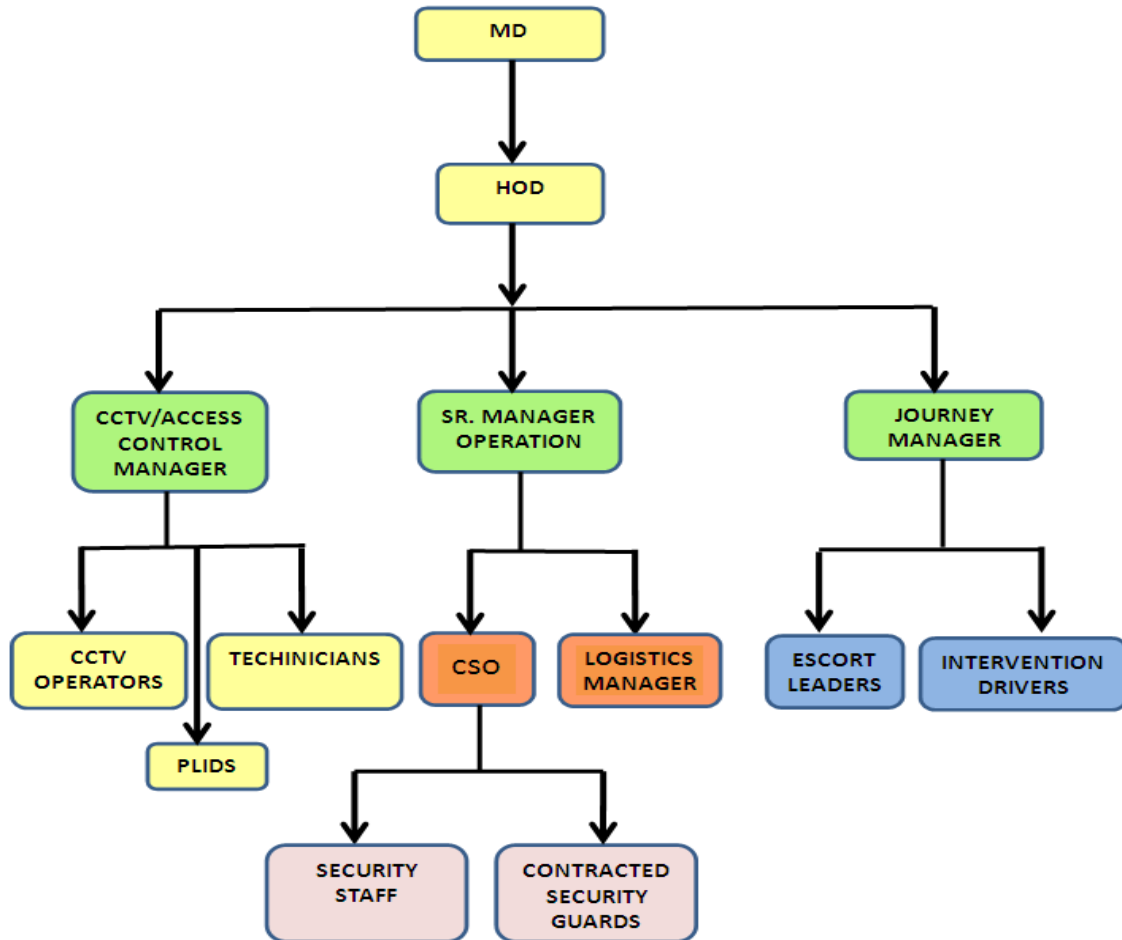
#### 4.1 A brief metrics of security resource is as below:

S/N	SECURITY RESOURCE	ACTIVITY	MANNING
01	Core Security Management consisting of expatriates who have previously served in armed forces and have experience in working in multifunctional environment drawn from defense forces from Colonel to Lieutenant ranks with special focus on civilian defenses and security hardware systems specialist.	24x7 security vigilance at site and controls all over the complex for monitoring.	06 members management team supported by dedicated control room and floor staff
02	Nigerian Army (ZULUS) & Nigerian Mobile Police (MOPOL)	Additional security measures; deployed for safe convoy management & to control incidents of civil disturbances.	Team consisting of Officers, -Sergeants and Other ranks deputed at site on continuous monitoring basis
03	Nigerian Conventional Police	Additional security measure to control incidents of civil disturbances	Team consisting of Inspectors, and constables deputed at site on continuous monitoring basis
04	Explosive Ordnance Department team (EOD)	Additional security measure to control & check movement of all vehicles	Team consisting of Inspectors, constables deputed at site on continuous monitoring basis
05	Contract Security personnel drawn from experienced private security deployed at critical access points and resources.	24x7 contract security guards engaged for complete checks, access controls, traffic guards, emergency services and gate controls	289 Nos. team consisting of security coordinators, supervisors & guards

The management of security has been designed to ensure the unilateral reporting to Head-Security and Administration channelized through various hierarchies.

This helps in centralized and quick decisions with effective actions implemented thereof.

#### 4.2 Organogram for Indorama Security management



#### 4.3 Physical Security Measures

Physical measures such as transportation for employees to-and-from has been great advantage. This ensures a direct discipline of all personnel reporting for their respective duty hours validated by Biometric Punching.

Apart from this, a dedicated and secured car parking space is created within the Indorama Complex for employees commuting in their own vehicles.

A dedicated fleet management system is at place that functions to transport employees, contractors, guests and visitors across the site on periodical basis. The fleet management is owned and controlled by administration department to ensure vehicle road worthiness as well as drivers' discipline. Further, this prevents any untoward vehicles entering inside thereby making it a foolproof security management.



Apart from the human resource, various tools and tackles including proven technologies are being used to eliminate any security issues at site. The technology is infused with security practices with defined responsibilities for each function and is established to form a cohesive activity.

Table below highlights the various tools and technology being practiced at site on regular basis:

S/N	SECURITY RESOURCE HARDWARE	ACTIVITY	MANNING
01	Perimeter Protection	Preventing external intrusion Securing of perimeter by electrified fence &	Installation of electrified fence on perimeter wall, CCTV camera monitoring & surveillance by physical patrols.
02	CCTV Monitoring System	Surveillance of access gates, perimeter & critical places within the complex.	24X7 monitoring by team consisting of CCTV operators & technicians
03	Biometric Access control system	Prevent unauthorized access	Manning access gates by security guards & monitoring by CCTV surveillance team
04	Gates & Boom Barriers	Control on access for personnel & vehicular movement	24X7 manning by security guards & monitoring by team CCTV operators.
05	Visitor Management system	Control on movement of unauthorized individual to the complex	Controlled by gate security team & access Control team
06	Pipeline Leak & Intrusion Detection System (PLIDS)	Safe & secure transfer of GAS & C5 product	24x7 manned by on ground surveillance team & monitoring by PLIDS operator from command & control room

Apart from these, routine security checks (frisking and metal detector checks) are being done. These are done on random basis to ensure no theft issues take place.

## 5.0 SECURITY OPERATING PROCEDURES

Detailed Operating Procedures are in place for the below mentioned activities:

- Management of Convoy
- Access Control
- Finished Goods/Logistics Vehicular Access
- Patrolling
- Procedure for handling Emergency scenarios
- Access to Project related manpower/vehicles

## 6.0 SECURITY SUPERVISION AND CONTROL

Indorama's security management takes a systematic approach to the company's security needs by providing appropriate frameworks, procedures, standards, and guidelines that can be consistently applied across all operations and construction project.

This enables the company to implement best practices and achieve planned security outcomes.

A major focus for Indorama security has been developing robust, world-class security framework for asset protection including residential complex, plant and equipment, vehicles, commodities, and materials. To protect these assets, Indorama's security has established a set of physical and technological security measures that are used for its operations. These standards provide a level of assurance to the senior leadership team, Board, shareholders, and to external stakeholders that Indorama's security team is taking proper steps to secure human and other assets. This same approach will be extended/applied for the new project.

Indorama's approach considers relevant risks and exposures, along with an evaluation of the appropriate balance between technology and staff resources. They are developed in consultation with key stakeholders to achieve these objectives:

- Establish minimum compliance levels
- Enable effective auditing to ensure standards are being maintained
- Create controls over unnecessary or redundant expenditure
- Align security activity with key priorities





In addition to the minimum standards, site security team is encouraged to put in place additional measures or controls required or recommended at their particular operation as dynamic control measures.

Indorama has developed a comprehensive, industry- leading approach through a set of best practice measures for the protection of assets and personnel and is supported by an audit program, detailed procedures, and an alternate control/exemption process. Any exception to the standard is subject to a thorough risk assessment process and must satisfy senior management that an appropriate alternate control is in place. Through the auditing process, Indorama Security Management System ensures that effective internal controls are implemented. If any control gaps are identified, the audit process outlines any remedial actions required.

Standards and guidelines for protecting fuel, explosives and other materials are also part of the Indorama Security Management System, along with standard operating procedures for various tasks

and responsibilities of security personnel.

Indorama security function has an annual audit plan that addresses the highest priority risks. These periodic audits ensure that security is compliant with corporate strategy, standards, legislation, and regulations. In addition to the annual audit plan, management may request focused audits or reviews as desired. The audit scope may cover various technical, procedural and/or organizational areas. Audits are conducted by members of the security team who may be assisted by internal and external resources. Combined with periodic risk assessments, reviews, and information analysis, these audits help determine the continuing suitability and effectiveness of security controls implemented for a particular risk environment.

## **7.0 PRIVATE SECURITY FORCE MANAGEMENT**

As indicated earlier, a dedicated contract management staff is at place and functional for the entire Indorama Complex. This team mans the entire site at all the security gates 24 x 7 and controls the movement of personnel, vehicles and goods after confirming valid documentation.

All the security guards are provided with Radio (Walkie-Talkie) with security channel hooked up. This enables the security officers to stay in touch with the security guards all the time and message percolation for quick action in case of any civil disturbance.

Apart from this, the security guards are trained to handle industrial emergencies like fire, gas release and emergency management. The guards are trained to understand the basics of emergencies and responsibility entrusted to them to act in these conditions.

The security guards are rotated at all gates to enable them to gain learnings and exposed to various nuances of security functions.

This private security management team numbers approximately 289.

The staffing is from local communities and their background credentials are verified before hiring to eliminate criminal antecedents' characters. Periodic trainings are conducted on regular basis. Their reporting is to Indorama Core Security Team. Systems and documentation is at place for reporting to track all developments.

## **8.0 MANAGING RELATIONS WITH PUBLIC SECURITY**

The Nigerian Army, Police, DSS & EOD are deputed as extra security element at site. This group is in regular contact with Indorama Security Management team. They have a complete set up of security team and weapons and are housed inside the complex for better management and control. This forms the interface basis of contact for Public Security and are consulted for any public security contacts. Since the group is in constant touch with agencies, update as are regularly received and dynamic actions may be formalized based on the intelligence inputs.



Last but not the least, the National Security Advisor (NSA) – the premier and apex security body, visits have been acknowledged at site on numerous occasions and has been widely reported in print and electronic media.

THE FINAL THUMBS UP TO OUR SITE FUNCTIONING WAS THE COMMISSIONING OF FERTILIZER PLANT BY THE THEN ACTING-PRESIDENT OF NIGERIA ON 29<sup>TH</sup> JULY 2017.

#### IMAGE OF ACTING PRESIDENT INAUGURATING THE FERTILIZER FACILITY



#### IMAGES OF GOVERNORS VISITING INDORAMA FACILITY

Governor- Rivers State



Governor- Kaduna State



Governor- Kano State



Governor- Bauchi State



Governor- Bauchi State

## 9.0 INCIDENT REPORTING AND INQUIRY

Like any major corporation in the primary industries, Indorama is subject to a wide range of security challenges in the course of its normal operations.

These challenges may include critical incidents, which we define as single high-impact security events that require an immediate local response. Examples of critical incidents include:

- Fraud
- Unauthorized access
- Sabotage
- Major theft
- Strike
- Kidnap/abduction
- Bomb threat
- Evacuation

For high-impact critical incidents, Indorama Security has developed a critical incident management plan to ensure an appropriate response and an orderly recovery process.

Each plan outlines the resources and equipment required for an immediate response to mitigate and contain any impact. The plan clearly identifies – according to the nature of the incident – the required actions and participants' roles and responsibilities. The critical incident plan also details decision points that require engagement of the regional and corporate crisis management teams. Crisis management plans contain guidelines for engagement with the media, host community, and other stakeholders.

These plans help Indorama Security manage a critical incident effectively, and ensure integration into the Indorama Crisis Management System. This approach reduces the potential for harm to people, ensures the continuity of the business, and reduces financial loss and negative impacts on company reputation.

Unlawful acts by security personnel: The security personnel themselves are subjected to intense scrutiny and are always subjected to regular questioning. Further, if any suspicious elements are identified, they are under intelligence radar. Suitable evidences are gathered for malpractices conducted by him / her. Finally, they are subjected to internal inquiry and the handed over to Public Security (Police) for final inquest.

If proven guilty, they are suspended and are blacklisted for re-recruitment.

The same law applies to all the personnel.

## **10.0 COMMUNITY ENGAGEMENT AND GRIEVANCE MECHANISM**

Community engagement is a central aspect of a good security program, and good relations with employees and local communities can substantially contribute to overall security in the project as well as operations area. As has been mentioned in previous section, the private security staff are drawn and hired from communities that are on the list and endorsed by their chieftains. This strategy has paid rich dividends since they are better informed about the developments and inputs are well acknowledged.

Further, the “operational silos” condition is eliminated since most of the employees also being from the same communities and are well connected without having a fear jinx. An exclusive Community Relations (CR) team is already at place headed by HR functionary. The CR team is the receptacle of all complaints from various communities and have a well-oiled machinery to address these. These have been well acknowledged by all the community stakeholders. Any grievance toward security team shall also be routed through this channel since the team and system is well-connected and is the known face among the communities.

Further, the empanelment of this grievance team is from the community themselves to enable them to mitigate the grievances in smooth manner.