

# The corporate values and code of conduct of **ORLEN Unipetrol Group**

**March 2021**



## Table of Contents

I	<b>Foreword by the CEO of the ORLEN Unipetrol Group</b>	3
II	<b>Corporate Values and Code of Conduct of the ORLEN Unipetrol Group</b>	4
III	<b>Internal Relations</b>	5
1.	Respecting Employee Dignity and a Friendly Working Environment	5
2.	Employee Health and Safety	6
3.	Communication and Interaction with Employees	7
4.	Equal Opportunities for Employment, Promotion and Career Growth, Development of Qualifications and Increased Responsibilities for Employees	8
5.	Employee Acts Outside the Workplace and Hours of Work	8
6.	Misusing Corporate Time, Assets and Equipment	9
7.	Accepting and Offering Gifts and Hospitality	9
8.	Conflicts of Interest and Competition	10
9.	Personal Data Protection	11
10.	Financial Data	11
IV	<b>The ORLEN Unipetrol Group and its Environment</b>	12
1.	Owners	12
2.	Customers	12
3.	Local Communities	13
4.	The Environment	14
5.	Business Partners	14
6.	Competition	15
V	<b>Final Provisions</b>	16
1.	How to Use the Code of Conduct	16
2.	Confidentiality	17
	Reporting and Resolving Breaches of the Corporate Values and Code of Conduct of ORLEN Unipetrol Group	18



## I Foreword by the CEO of the ORLEN Unipetrol Group

Dear Colleagues,

A shared culture and values help define a society and its constituents. This principle also applies to manufacturing companies and business corporations, and hence to the ORLEN Unipetrol Group.

Each day, the ORLEN Unipetrol Group strives to provide the best products and services to its customers and care for its employees, motivate them and act responsibly towards the outside world and the environment.

Compliance with ethical standards and principles in our daily activities is crucial to a successful and sustainable business. You therefore now have in your hands the Code of Conduct of ORLEN Unipetrol Group, summarising our corporate values and the main principles of engagement in transparent and ethical business.

In a brief and well-arranged manner, this short document summarises our mission, the forms of conduct and values shared under the ORLEN Unipetrol Group and the entire capital group ORLEN. However, it is not a simple list of required behaviours. The Code of Conduct also serves as a guideline for anyone who may feel or observe acts which conflict with our ethical principles.

I believe this document will become a useful tool for both ORLEN Unipetrol Group employees and our customers and partners.



Tomasz Wiatrak  
CEO  
ORLEN Unipetrol



## II Corporate Values and Code of Conduct of the ORLEN Unipetrol Group

Everything we do at the  
ORLEN Unipetrol Group  
is underpinned by  
**our values**



### III Internal Relations

#### 1. Respecting Employee Dignity and a Friendly Working Environment

To provide a friendly working environment at the ORLEN Unipetrol Group, our daily work is based on the fundamental principles of fairness, respect, dialogue and teamwork and the determination to create a corporate culture which is in line with our corporate values.

- a) We create a working environment based on integrity, mutual respect, tolerance and cooperation.
- b) We reject any form of discrimination and bullying, which includes any form of harassment, intimidation or humiliation, and we are firmly resolved to intervene against such behaviour at any time.
- c) We reject any form of sexual harassment, and we are firmly resolved to take decisive action against such behaviour.
- d) We do not accept any offensive behaviour or comments.
- e) We never use our position in the company to seek personal gain.
- f) We never give contradictory instructions. If we obtain such instructions, we can reject them until our superiors entirely explain them.
- g) We accept only such instructions which comply with the competencies corresponding to our job and position.
- h) If we obtain ambiguous instructions, we have the right to request an explanation of what we are expected to do.
- i) As managers, we never give instructions which conflict with the law or force employees to contravene their powers.
- j) Managers should encourage a friendly atmosphere in the workplace, mainly by:
  - approaching employees as equal partners,
  - paying attention to any employee problems and concerns by providing suitable space and sufficient time to discuss them,
  - supporting their subordinates if they need help in dealing with any issues,
  - seeking as much as possible that all the steps associated with an employee's departure are performed in compliance with ethical conduct towards the employee.



## 2. Employee Health and Safety

We do our utmost to ensure that all ORLEN Unipetrol Group sites are safe. We continually improve established systems and workflows to enhance occupational safety and protect the health of our employees. We aim to reach a zero-accident rate at all our workplaces.

- a) We all are responsible for our safety and the safety of our colleagues.
- b) We keep improving our occupational health and safety results in accordance with applicable laws and regulations, standards, internal guidelines and our insights.
- c) We continually improve the methods used to detect risks and prevent accidents in the workplace and occupational diseases.
- d) We keep raising employee qualifications in occupational health and safety and supporting employee determination to be involved in initiatives which focus on improving working conditions.
- e) We clearly present our occupational health and safety policies and activities to employees and the public.
- f) In risky situations, life-saving activities are our top priority.
- g) We are committed to permanently complying with the regulations, rules and standards applicable to the respective job position.
- h) We protect our lives and health by using appropriate protective equipment, clothing, and footwear, as required by the internal regulations for the respective job position.
- i) We are demonstrably familiarised with the use of personal protective equipment, its maintenance for operational serviceability and instructions for use.
- j) We always use the correct tools in accordance with their purpose.
- k) We never consume alcohol, drugs or other narcotic substances while at work, and we never commence working while under their influence.
- l) We adhere to the quality standards of our products and services.
- m) We report any violation of occupational health and safety regulations, each accident, illness or uncontrolled release of hazardous substances into the environment to the competent institutions.
- n) In the case of any risk, we warn all persons who appear in potentially hazardous areas.



### 3. Communication and Interaction with Employees

Communication between ORLEN Unipetrol Group employees is based on the exchange of reliable and relevant information necessary for the due and proper operation of the Group. We believe that open and straightforward communication supports good mutual relations, thus improving the group's competitive edge and value.

- a) Our employees keep up with the current strategies, plans and objectives of the ORLEN Unipetrol Group.
- b) As managers, we pass on to our subordinates the latest information about any planned changes which may affect their current or future career in the organisation.
- c) We provide our employees with relevant information about their work performance. We explain the reasons for our decisions and suggest areas for improvement.
- d) Our opinions on how the Group is managed must have a coherent and material basis. In procedures, we discuss proposals of how to improve the internal processes in the Group and support its growth.
- e) A manager is obliged to:
  - discuss with the employee any doubts the employee may have about the organisation's operation; or, if the manager cannot do that, the manager must refer the respective employee to a competent person who can provide a satisfactory answer,
  - explain all changes in internal rules and regulations pertaining to the employee's work,
  - initiate cooperation between individual organisational units.

The "open door" policy means that managers are ready to speak with their employees and give them the option for an open dialogue where an employee can rely on the superior's support and compliance with the discussed topic's confidentiality. Managers at all levels are responsible for the implementation of these principles.

Each manager must listen to his/her employees so that they are able to jointly decide on the measures to take in the case of an alleged breach of the Code of Conduct.

Under the "open door policy", each employee may ask for a meeting with the CEO or another ORLEN Unipetrol Group manager.



#### 4. Equal Opportunities for Employment, Promotion and Career Growth, Development of Qualifications and Increased Responsibilities for Employees

At the ORLEN Unipetrol Group, we create and promote a culture based on trust, equal opportunity, fair treatment of all employees regardless of their gender, age, job title, duration of employment, membership in trade union organisations, religion, nationality, physical appearance or sexual orientation. We offer work to people with disabilities, arranging for their appropriate working conditions and career opportunities. We also seek to remove all social barriers, thus supporting their integration with other employees. Our rules for employee recruitment, career growth, development and education, evaluation, remuneration and bonus programmes are simple, transparent and fair.

- a) We comply with the rules applicable to employee recruitment, career growth and professional development.
- b) We evaluate the work of our colleagues and subordinates based on their merits.
- c) We are open and thoroughly consider any feedback we receive about the quality of our work.
- d) As managers, we encourage any effort aimed at increasing the qualifications of our subordinates.
- e) We are involved in open and constructive dialogue about work performance and how to reward achievements.
- f) We reject any form of discrimination.
- g) We develop and implement procedures which facilitate the employment of people with disabilities.

#### 5. Employee Acts Outside the Workplace and Hours of Work

Our actions outside work remain private; the ORLEN Unipetrol Group does not interfere in them. Nonetheless, our behaviour should not jeopardise workplace safety, our ability to do our job or bring the Group into disrepute.

- a) We are aware that our opinions expressed outside the workplace and hours of work may be interpreted as an official position of the ORLEN Unipetrol Group.
- b) When we comment on anything regarding the ORLEN Unipetrol Group outside the workplace and hours of work, we must either present the group's official position or make it clear that this is our private opinion.
- c) We protect the organisation's good reputation, represent it honestly and with deliberation, which will ensure that our attitudes and behaviour outside hours of work will always be appropriate.





## 6. Misusing Corporate Time, Assets and Equipment

We should support the group's prosperity and growth. As honest employees, we respect the organisation's assets, use its equipment for the designated purpose, and spend time working productively.

- a) We do not use the organisation's assets (telephones, copy machines or other equipment and machines, goods and company cars) for other than work-related purposes unless the internal guidelines state otherwise.
- b) We do not carry out our own business while at work.
- c) We do not use corporate means for private purposes.

## 7. Accepting and Offering Gifts and Hospitality

The practice of offering and accepting gifts is acceptable in business if it serves to build excellent and fair relations with business partners. The quality of our products and services and highly professional relations with external partners are a pillar of the ORLEN Unipetrol Group under its cooperation with customers and business partners. For us, accepting any financial donations, gifts or complimentary services which could impact our business resolutions' objectivity is not acceptable.

- a) Accepting minor gifts on the condition that such gifts do not have any impact on our decisions and do not bind a reciprocal service or if they are promotional items delivered officially or publicly (e.g. during a formal event) is permitted.
- b) We do not offer other than standard benefits, including promotional items or other low-value items, to our business partners.
- c) We have a moderate approach to participation in entertainment events and informal meetings organised by our business partners if it should influence our objectivity in business-related decisions concerning these partners.
- d) Under our group's activities, we meet state administration representatives, business partners and potential business partners. During these meetings, we may not present the benefits of ORLEN Unipetrol Group products and technologies if it could be seen as an attempt to impact decisions with a pledge of personal gain.
- e) The policy concerning accepting and providing gifts at the ORLEN Unipetrol Group is governed by the Policy – Internal Anticorruption Programme in Appendix A. If you are unsure whether to accept or reject a gift, contact your immediate superior, the anticorruption policy coordinator or ethical standards ombudsman.



## 8. Conflicts of Interest and Competition

At the ORLEN Unipetrol Group, we value integrity and respect for our organisation. As employees, we aim to avoid situations which could contribute to a conflict of interest when our private interests could impact our decisions. Therefore, we maintain and implement adequate procedures aimed at identifying potential conflict of interest. We also seek to ensure that internal systems, control mechanisms and practices correspondingly serve to identify and resolve conflicts of interests.

- a) We do not provide consultation services to the competitors of the ORLEN Unipetrol Group.
- b) We do not render any services to competitive companies under employment or mandate contracts, nor do we act on the managing bodies of such companies.
- c) We may own a competitor's shares, but only in such volume that will not impact the competitor's business decisions.
- d) We refrain from influencing the process of supplier selection if we hold any shares in the given company or if our relative or close person is an owner or employee of such a supplier.
- e) We never invest in the supplier's shares if we are directly or indirectly (as a manager) involved in the selection, evaluation or negotiation process.
- f) We never invest in the supplier's shares if we are a person who is directly or indirectly (as a manager) responsible for the negotiations and cooperation with the supplier concerned.
- g) Any other competitor, customer or supplier relations which may cause a conflict of interest must be reported to our superior. The next steps must follow the applicable internal guidelines, mainly the Policy – Internal Anticorruption Programme. An employee must obtain the employer's written consent, and if doubt persists, the issue must be consulted with the anticorruption policy coordinator or ethical standards ombudsman.
- h) At the ORLEN Unipetrol Group, we avoid situations which could increase suspicion of protectionism within manager-subordinate relations, employing relatives or other close persons.



## 9. Personal Data Protection

At the ORLEN Unipetrol Group, we emphasise the protection of information, including the personal data of employees and cooperating partners, that we as employees encounter when we perform daily duties. We collect only such data in the scope necessary for the group's correct operation. We are particularly careful when working with information protected by the law, internal guidelines or applicable provisions of agreements with business partners of the ORLEN Unipetrol Group companies.

- a) Under our professional obligations, we only collect such information necessary to perform such duties, hence for the group's operations.
- b) When storing and archiving such information, we observe special security measures.
- c) We ensure the security of information concerning the ORLEN Unipetrol Group, its employees and cooperating partners.
- d) We respect intellectual property. For example, we never copy or use third-party documents or materials without the author's consent.
- e) Every employee has the right to:
  - access his/her personal information collected and registered by the organisation,
  - inspect his/her personal employee file.

## 10. Financial Records

At the ORLEN Unipetrol Group, we comply with the legal and internal regulations governing the administration of accounting items and records of accounting (tax) documents. The accuracy and transparency of supporting documents must be ensured to give an accurate and detailed view of all transactions and use of the organisation's sources. Those of us who have access to financial and accounting data to satisfy our work obligations and who use such data in our daily work must to the best of our best effort ensure the credibility of all financial and accounting records.

- a) We do not reject the provision of information concerning transaction balances.
- b) We do not open anonymous or unregistered funds or accounts for any purpose.
- c) In our books, we do not state untrue information, nor do we deliberately publish misleading information in our reports.
- d) We accept and pay solely verified accounting (tax) documents which genuinely depict the transaction's essence.



## **IV The ORLEN Unipetrol Group and its Environment**

### 1. Owners

The ORLEN Unipetrol Group seeks to ensure permanent value growth for its owners. We act in accordance with the adopted corporate regulating standards, supporting security and stable relations with our owners.

- a) We respect the owners' rights to receive all relevant information, as required by the applicable laws and regulations.
- b) We pursue an open information policy and answer questions regarding ORLEN Unipetrol Group activities in the best possible way.

### 2. Customers

Customer interests and satisfaction are our utmost priority. Our customers have the right to expect top-level reliability, high quality products and services, and professional assistance.

- a) We meet all commitments to our customers; we do not abuse their trust or any potential lack of knowledge or experience.
- b) We treat all customers fairly and equally, regardless of their gender, age, appearance, status, nationality, religion or sexual orientation.
- c) Our customers always receive professional and competent services in a friendly manner which adequately reflects their needs and expectations, whether they contact us in person or in writing.
- d) In our customers' interests, we perform internal audits, adopt corrective measures and precautions, and continually use their experience to identify organisational or technical shortcomings and eliminate non-professional behaviour.
- e) We see to ensure that the products offered to our customers meet the highest quality standards.
- f) In our external communication, we always provide complete and accurate information about our products, services and activities, except for information containing technical, technological, trade or organisational secrets, which could, if disclosed, subject the ORLEN Unipetrol Group to losses. We protect such information according to special legal regulations.
- g) We assume full responsibility for our products and services and withdraw any defective products from the market.
- h) We secure orders in accordance with applicable legislation and business contract provisions.
- i) We provide our customers with reliable and accurate information regarding any extra costs, difficulties or delays in planned deliveries.



- j) We deal with any complaints quickly and effectively and inform customers about the results of each submitted complaint.
- k) We thoroughly analyse any comments regarding our products and services and use the results of analysis to improve our offer and align it to customer needs and expectations.
- l) We are aware that it is necessary to ensure solid and reliable marketing communication and responsible advertising.

### 3. Local Communities

We are determined to build permanent relations with local communities based on integrity, dialogue, partnership and trust. This is why we are accountable for supporting our immediate vicinity, local initiatives and the local labour market. We want the ORLEN Unipetrol Group to contribute to economic development at the local level and become a good neighbour and valued partner.

- a) We support local initiatives which aim to improve the quality of life in local communities, based on partnership and principles of dialogue.
- b) We analyse the long-term impact of our activities and seek to achieve an optimal cost/benefit ratio of our participation in local communities.
- c) We support projects aimed at developing sports, culture and environmental protection.
- d) We support initiatives which seek to promote the education of local communities, prevent social and economic exclusion, enhance safety, improve the health care system, and support health and healthy lifestyle.
- e) We are engaged in charity activities, help the needy, and support life and health protection.
- f) We follow corporate social responsibility principles (CSR) and endeavour to combine business success with the care for local communities and the environment.



#### 4. The Environment

As a significant corporation in the Czech Republic and a company which influences the entire Central European region, the ORLEN Unipetrol Group has special obligations towards the environment. We are committed to environmental protection and believe it is necessary to maintain a sound balance between industrial activities and the natural environment. Being aware of our ecological footprint, we are engaged in a dialogue with organisations and institutions which help us attain sustainable development principles. We seek to achieve this by integrating the prevention and limitation of environmental pollution with active protection of the environment and rectifying any damage caused by our activities.

- a) In our industry, we seek to ensure that manufacturing, storage and distribution processes do not harm the environment.
- b) We mitigate the impact on the environment related to the use of our products.
- c) We care for the environment, regardless of where we work and what we do.
- d) In our daily work and operations, we follow our internal guidelines and laws related to environmental protection.
- e) We report any identified incidents which are harmful to the environment to our superiors and environmental inspection authorities in accordance with the determined procedure.
- f) We are engaged in projects and initiatives aimed at environmental protection.

#### 5. Business Partners

We build business relations with our business partners based on integrity, transparency, mutual respect and professionalism.

- a) We fulfil our promises and commitments.
- b) We make payments and other obligations on time and in line with contractual terms and conditions.
- c) In the case of more complicated situations or conflicts, we seek to resolve it through dialogue with the parties concerned.
- d) In selecting suppliers and other partners for cooperation, we comply with the applicable laws and internal guidelines and market principles (attractive price terms, quality of products and services meeting needs and expectations, company's reliability and professionalism) while ensuring complete transparency of the process.
- e) We evaluate our business partners solely based on their real qualities and business aspects.
- f) We familiarise our business partners with our standards of conduct.
- g) We are not negligent to any violations of the law or ground-rules of conduct by our partners. We report these incidents to our superiors or competent state authorities if required.



## 6. Competition

As a significant market entity in the Central European region, we are committed to performing our business under fair competition principles and in a transparent manner. We believe that market competition should be based on high-quality products and services offered at reasonable prices.

- a) We are never involved in practices such as industrial espionage, theft or concealment of identity to gain access to our competition's secret information.
- b) We never make contemptuous remarks regarding our competitors' businesses, financial positions or potential legal problems to gain a business advantage.
- c) We collect information about our competitors regarding their products, services and marketing strategies in accordance with applicable legislation.



## V Final Provisions

### 1. How to Use the Code of Conduct

The Code of Conduct is binding on all employees, persons and fellow workers of the ORLEN Unipetrol Group. Each employee has the responsibility to read and follow this Code of Conduct and behave, perform and act in accordance with the corporate values of the ORLEN Unipetrol Group and the fundamental principles specified in this document. Compliance with the Code of Conduct is our essential obligation.

We aim to ensure compliance with the highest ethical standards at the ORLEN Unipetrol Group. We want to be certain that all employee questions or concerns about ethics are resolved to their satisfaction. If you have any questions concerning compliance with this Code of Conduct, you may consult your immediate superior or other manager and thereby find help and assistance in dealing with your concerns and making the right decisions. Nonetheless, if you continue to have any doubts about the corporate values and the Code of Conduct of ORLEN Unipetrol Group, you may always contact the ethical standards ombudsman.

If you want to report any breach of the corporate values or the Code of Conduct of ORLEN Unipetrol Group, you have four options:

**Option 1** – If you think the corporate values or the Code of Conduct of ORLEN Unipetrol Group have been violated in any way, report your concerns to **your immediate superior or other manager**.

**Option 2** – If you have a serious reason why you cannot turn to your immediate superior or other manager with a request for help regarding ethical problems, **you may submit your concerns to the ethical standards ombudsman**. The ethical standards ombudsman is authorized to deal with any violation of standards effectively and ensure the adoption of practical corrective actions.

If you wish to report a violation of the corporate values or Code of Conduct of ORLEN Unipetrol Group to the **ethical standards ombudsman**, you may send it to the following anonymous emails: **anonym@orlenunipetrol.cz** or **etickykodex@orlenunipetrol.cz** or by mail to the following address:

ORLEN Unipetrol a.s.  
**Etický ombudsman**  
Milevská 2095/5  
140 00 Praha 4

**Option 3** – If you believe the corporate values or Code of Conduct of ORLEN Unipetrol Group have been violated, you may also notify the safety and control director of ORLEN Unipetrol RPA s.r.o. by mail, email, telephone or in person.





**Option 4** – You may also leave a voice message on the anonymous telephone number **+420 476 162 626** (or internal number: **2626**) or **+420 736 508 500**. The lines operate on workdays from 8 am to 3 pm.

Any breach of the corporate values or the Code of Conduct may be reported either anonymously or with contact details. If the report is submitted without the informant's contact details, it may interfere with or prevent verification of the submitted information, and consequently, investigation of the case.

Any reports regarding the violation of corporate values in the ORLEN Unipetrol Group will be duly verified, and depending on the gravity of the case, addressed with the support of the HR Division Director, Legal Division Director, Security and Control Division Director, or individual executives of ORLEN Unipetrol RPA s.r.o. If necessary, complicated cases may be consulted with the company's ethical commission. More information about the corporate values and Code of Conduct of ORLEN Unipetrol Group is available on the intranet (section 'HR Issues' /*Personalistika*/).

## 2. Confidentiality

Please remember that if you submit an inquiry or seek help from your superior, management member, ethical standards ombudsman or Security and Control Director of ORLEN Unipetrol RPA s.r.o., you need not worry about safety at your work or the confidentiality of the information you provide. All the above persons and other stakeholders protect the confidentiality of such information and your personal data under the special regulations regarding the protection of the company's trade secrets, personal data and confidential information.

