



Human Rights Protection Policy in the ORLEN Capital Group

Introduction

This Policy sets out the key principles of the actions, responses and regulations binding in the Group that are directly or indirectly related to ensuring respect for human rights within it and in relations with external stakeholders.

Respect for human rights in the ORLEN Group is implemented on the basis of internal regulations, national legislation and international standards and guidelines, in particular:

- ✓ **Universal Declaration of Human Rights**
- ✓ **The International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, i.e. based on key ILO convention**
- ✓ **The UN Guiding Principles for Business, i.e. the United Nations framework document "Protect, Respect and Remedy"**
- ✓ **Organisation for Economic Co-operation and Development (OECD) guidelines for multinational enterprises**
- ✓ **International Finance Corporation (IFC) standards**
- ✓ **The Ten Principles of the United Nations Global Compact.**



01

Caring for our employees' human rights



Creating an open and tolerant working environment

The ORLEN Group is committed to promoting values, principles and ethical standards that aim to build an atmosphere of acceptance and deepen the understanding of diversity and its importance in the employing establishment. Through its actions, the Group creates conditions for an open and tolerant workplace.

The ORLEN Group promotes an inclusive working environment that provides equal opportunities for all employees, regardless of gender, marital status, parenthood, ethnic, national or social origin, sexual orientation, religious beliefs, political affiliation, age, disability or trade union membership.

In addition, the ORLEN Group recognises the right of employees to be able to speak freely on topics that concern them, as well as the right to privacy – and does not interfere in employees' domestic or family matters.



Health & safety at work

Caring for the health and safety of employees is an overriding value in the ORLEN Group, an important element of the organisational culture and business ethics, as well as an expression of care for fundamental human rights.

The ORLEN Group provides a safe and clean working environment for all its employees, making every effort to ensure that work stations are free from risks to health and life and are organised in such a way as to protect against accidents and serious injury.

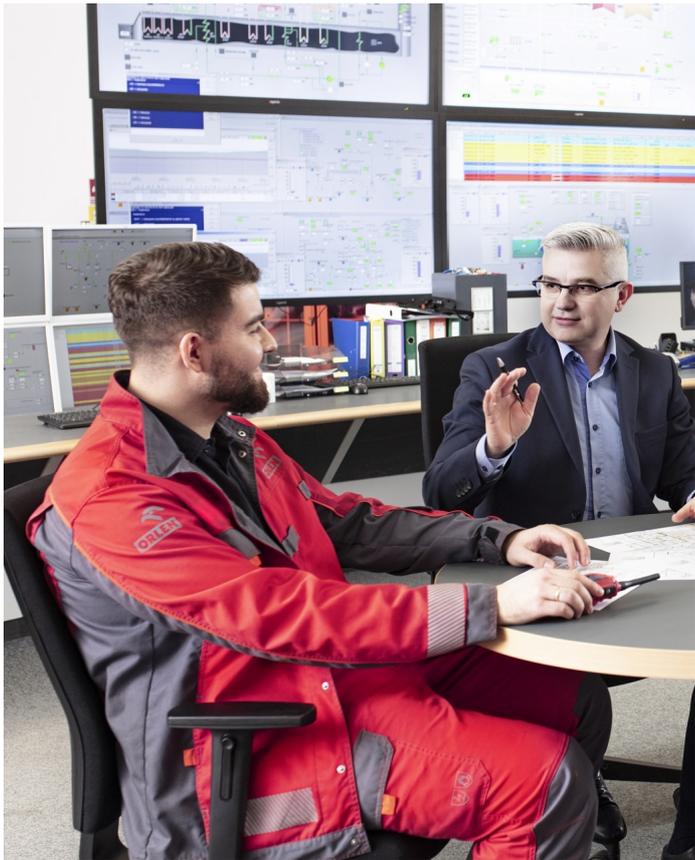
The Group implements these activities on three levels – by shaping a safety culture, by developing personal and process safety and by undertaking a range of activities and advanced initiatives to prevent accidents, industrial breakdowns, fires and other unwanted events.



Our employees' well-being

The ORLEN Group has comprehensive and diverse well-being programmes in place, covering all areas of employees' functioning, enabling them to meet their varied needs and supporting their work-life balance.

The Group's programmes include an extensive benefits fund, additional private medical care, health prevention programmes, occupational psychology support, family support programmes, shopping cards, life insurance, retirement savings programmes and many others.



Freedom of association and cooperation with social partners

The ORLEN Group respects the rights of employees to form and join trade unions or employee organisations of their choice, and to engage in collective bargaining – without fear of reprisals.

The ORLEN Group recognises trade unions as employees' representatives in matters of their collective rights and interests within the limits set by generally applicable laws, and is committed to respecting the principles of freedom of activity and equality of trade unions and the protection of trade union rights.

The ORLEN Group is committed to social dialogue, basing it on the independence of the parties, lawfulness of their actions and mutual trust, which in the long term translates into building constructive and sustainable business and HR solutions.



Equality in employment

The ORLEN Group cares about equal opportunities in recruitment and employment, in particular with regard to the establishment and termination of the employment relationship, conditions of employment, promotion and access to professional development training.

Employment and remuneration rules are shaped based on the highest standards, which aim to ensure suitable and adequate working conditions, including equal pay for equal work.

Employers in the ORLEN Group record and account for employees' working time in accordance with the law, while respecting their employees' right to rest and to paid annual leave.



Prevention of child and forced labour

The ORLEN Group is firmly opposed to the employment of children, i.e. people who under general law have not reached the legal age to work, and provides effective procedures to prevent child labour.

The ORLEN Group condemns forced labour, human trafficking or any other form of modern slavery, and its employees have the right to conclude and terminate their employment relationship with the Group companies according to their will.

ORLEN Group does not accept the retention of employees' identity documents, including work permits, and the charging of a deposit as a condition of employment.



Prevention of discrimination, bullying and any irregularities in the workplace

The ORLEN Group treats all employees with respect and does not accept any behaviour and irregularities aimed at violating human dignity, in particular bullying, discrimination and all forms of harassment.

The ORLEN Group's Code of Ethics is the foundation for building ethical standards and fostering correct attitudes among employees. It contains fundamental values and principles of conduct - consistent across the Group.

The ORLEN Group is committed to ensuring that harassment, exclusion, cruel treatment, violence, intimidation, any form of coercion or abuse and threats as a method of discipline or control do not occur in the workplace.





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02

Protection of human rights in the supply chain and in relations with stakeholders

The ORLEN Group is committed to emphasising the importance of human rights and promoting them wherever it operates, and expects all its business partners to respect them. Compliance with human rights by those with whom we work is an important factor to be taken into account when establishing mutual relationships.

As part of its commitment to respecting human rights throughout the supply chain, the Group expects its suppliers to act in accordance with the highest standards of business ethics and in compliance with laws and applicable international standards. These expectations are reflected in the Code of Conduct for ORLEN Capital Group Suppliers, which regulates key issues. The Code is aimed at developing and improving responsible business practices among our suppliers as well as their conduct consistent with ORLEN Group values, which is one of responsible business and sustainability in purchasing processes.

The Group also takes measures to prevent negative impacts on human rights linked directly and indirectly to its activities.

The ORLEN Group seeks to raise awareness among suppliers of the importance of caring for human rights in their own operations, while reserving for itself the right to verify compliance.

Wherever the activities of the ORLEN Group affect local communities or indigenous peoples, its companies do their utmost to respect their human rights in accordance with the International Labour Organisation's Convention 169 on Indigenous and Tribal Peoples in Independent Countries.

The ORLEN Group acts to balance the impact of its business activities on local communities, respecting the distinct rights of indigenous peoples, with particular regard to their cultures, lifestyles, institutions, links with their homeland and development. ORLEN Group engages in dialogue with local communities, implements projects for the development of these communities and, when necessary, engages in cooperation agreements with them.

The ORLEN Group promotes the resolution of conflicts through peaceful means and manages physical security activities, which means that within the framework of its activities it does not join in actions of excessive use of force by state authorities, in accordance with current international laws and standards, in particular the European Parliament Resolution on the right to peaceful protest and the proportionate use of force.

03

Reporting and handling irregularities

As an expression of its utmost concern for the protection of human rights, the ORLEN Group has implemented and applies effective mechanisms for reporting violations and irregularities.

Whistle-blowing rules in the ORLEN Group are based on the possibility of anonymous and voluntary reporting of irregularities that have led or may lead to violations of the law or personal rights.

The ORLEN Group ensures anonymity and security to those who report or disclose information about violations, while committing to an effective and reliable remediation process and implementation of remedial measures.

The Group does not tolerate or contribute to threats, intimidation, retaliation or attacks - both physical and legal - against human rights defenders and other stakeholders - related to the Group's activities.

With the solutions in place, the Group also has the ability to mitigate the effects of a breach and effectively prevent similar occurrences in the future. The used reporting and analysis methods allow for the systemic identification of any adverse reactions, and coordination of the corrective action.

Adopted solutions include the Group's employees, external stakeholders, i.e. all those who directly or indirectly interact with the Group, and apply to the external environment.





04

Group commitments and monitoring of conducted activities

The ORLEN Group believes and at the same time expects that all Group stakeholders share the responsibility for compliance with the above principles and commitments.

In order to identify, prevent, mitigate and account for possible negative impacts on human rights, the Group is committed to a human rights due diligence process in its operations and business relationships, also when planning and implementing new investment projects.

The Group monitors the effectiveness of its actions based on quantitative and qualitative indicators, and by reviewing internal policies and procedures that have - or may have - an impact on human rights.

The analysis of internal documents and procedures is continuous as human rights risks change over time and the Group's operation and their context evolve. These activities are provided by the effective Compliance System implemented in the ORLEN Group.

Caring for the protection of human rights is one of the ORLEN Group's development priorities.

The Group implements a variety of training programmes for employees to build awareness and sensitivity in respect of human rights, and designs and implements further measures that strengthen the solutions adopted and applied in this regard.

The ORLEN Group reserves the right to update this Policy.



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RESPONSIBLY.**

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