



**ORLEN CAPITAL GROUP
SUPPLIER CODE OF CONDUCT**

(TRANSLATION FROM POLISH)

INTRODUCTION

ORLEN Capital Group is a leading company in the fuel and energy sector in Central and Eastern Europe. Considering the substantial range of our activities, the way we conduct business has a major effect on the daily life of millions of people, efficient functioning of thousands of organisations and the whole economy. This means we have a huge responsibility to take on our shoulders. Therefore, we attach considerable importance to the question of sustainable development and corporate social responsibility. The business strategy we implement is consistent with the interests of our environment and is based on responsible use of available resources.

The foundation of all our activities is a set of ORLEN Capital Group Values:



Responsibility – Respect for our customers, shareholders, natural environment and local communities.



Development – Looking for new opportunities.



People – Competence, collaboration and integrity are our assets.



Energy – We are eager to act.



Reliability – We can be relied upon.

The ORLEN Capital Group Supplier Code of Conduct is a collection of principles expected to be followed by our Suppliers.

OUR RESPONSIBILITIES TOWARDS SUPPLIERS

As a market leader, ORLEN Capital Group is constantly striving to achieve the highest standards of conducting business and we always demand the best solutions of ourselves. This is also required by our owners, customers and employees, as well as regulatory authorities. We want to develop a culture of joint responsibility for business practices in occupational safety and health, human rights, business ethics, care of employees, local communities and natural environment at every stage of our activities. This also applies to our supply chain and Supplier relationships.

Therefore, we incorporate the principles of corporate social responsibility and sustainable development into purchasing processes, and the ORLEN Capital Group Supplier Code of Conduct makes an integral part of the relationship with our Suppliers, including the process of their evaluation and qualification.

When working with Suppliers we observe the principles of corporate social responsibility and sustainable development. We support our Suppliers' efforts to raise the awareness and develop best business practices in this respect. We believe that dialogue and collaboration with Suppliers towards corporate social responsibility and sustainable development is the only way to successfully develop our business and have a positive influence on our Suppliers.

In our opinion, an attitude like this will benefit our Suppliers and ourselves, as well as our social and business environments.

OUR EXPECTATIONS OF SUPPLIERS

We work with top Suppliers who continuously improve their services to meet the increasing expectations of the market. We encourage our Suppliers to develop and enhance responsible business practices according to the guidelines of ORLEN Capital Group Supplier Code of Conduct.

We seek to form business relationships with Suppliers who understand and share our view of corporate responsibility and sustainable development, strive to improve and advance their best practices in areas in which we set ourselves ambitious goals and which we find fundamental:

SOCIAL STANDARDS

1.1 Commitment to safety and health at the workplace



- a. Suppliers comply with all laws related to occupational safety and health applicable in the country where they conduct business.
- b. Suppliers ensure safe and healthy working conditions by implementing procedures, certified OHS management systems and/or own safety schemes, good practices and solutions to eliminate accidents, avoid injuries and diseases among their employees, resulting from performed work.
- c. Suppliers aim to set safety objectives in order to minimise hazards, monitor, analyse and document the implementation of the objectives and their actions, in pursuit of continuous improvement of their standards of safety at work.

1.2. Ensuring decent and non-discriminatory working conditions



- a. Suppliers comply with all labour laws applicable in their country and in the country where they conduct business.
- b. Suppliers are committed to ensure their employees equal access to decent working conditions regardless of the basis of employment available in the country where they conduct business.
- c. Suppliers do not accept workplace mobbing.

- d. Suppliers manage their employees and the workplaces in a responsible manner, e.g. providing them with opportunities to develop qualifications, ensuring safety at work, the necessary work-life balance etc. and determine their objectives in this respect.

1.3. Respect for human rights



- a. Suppliers guarantee equal treatment of their employees at work and do not use any discriminatory practices towards their employees and other stakeholders (e.g. customers) on the basis of age, gender, disability, race, ethnicity, religion or any other factors.
- b. Suppliers respect their employees' freedom of association.
- c. Suppliers ensure respect for human rights in their activities.

ENVIRONMENTAL STANDARDS

2.1. Continuous improvement in the management of environmental impact



- a. Suppliers comply with all laws related to the impact of their activities on natural environment.
- b. Suppliers make assessments of their operations to determine the risk of adverse effects on the natural environment and strive to prevent the risk.
- c. Suppliers undertake to set targets for a reduction of adverse effects of their operations on the natural environment (specified in an environmental policy or another binding official document).

2.2. Sustainable sourcing and use of raw materials



- a. Suppliers strive to source their raw materials in a sustainable and environmentally responsible manner and/or to consider environmental criteria in their purchasing decisions.
- b. Suppliers strive to reduce the consumption of raw materials and natural resources, including water, and to manage them in a reasonable manner.

2.3. Curbing greenhouse gas emissions



- a. Suppliers strive to curb their emissions of greenhouse gases, including carbon dioxide, arising directly or indirectly from their activities, proportionally to the scale and type of activities.



2.4. Sustainable waste management

- a. Suppliers comply with all laws related to the management of waste.
- b. Suppliers strive to reduce the generation of waste resulting from their activities.
- c. Suppliers ensure proper management of generated waste, including in collaboration with authorised waste recipients in order to reduce the risk of negative impact on natural environment.

ETHICAL STANDARDS AND MANAGEMENT SYSTEMS

3.1. Responsible management of the impact of their activities on social and natural environment



- a. Suppliers have clearly established objectives of corporate social responsibility and sustainable development, as well as their performance measures, in the form of a policy, strategy, declaration or another binding official document.
- b. In order to develop business and manage their impact on the natural environment and the quality of social life in a responsible manner, Suppliers should determine and communicate their objectives in a form that is comprehensible to their employees and other stakeholders. Therefore, ORLEN Capital Group Suppliers should have an established and drawn up set of priorities in environmental protection, social issues (e.g. as addressed in this Code of Conduct) and management standards.

3.2. Counteracting corruption



- a. Suppliers counteract any forms of corruption in their activities and implement preventive practices.
- b. If any form of corruption should be identified, the Supplier shall undertake firm remedial and preventive measures to counteract any future similar incidents.

3.3. High ethical standards of conducting business



- a. Suppliers apply principles of ethical conduct in every sphere of their activities.
- b. Suppliers undertake to implement solutions (e.g. by training employees in the

practical application of the Code of Conduct in the workplace etc.) raising the awareness of ethical principles of conduct at a workplace among employees and managerial staff.

FINAL PROVISIONS

The ORLEN Capital Group Supplier Code of Conduct is addressed to all Suppliers and Contractors of ORLEN Capital Group.

We expect that our Suppliers are committed to continuous development within the scope of social, environmental and ethical standards, as well as corporate governance, set in the ORLEN Capital Group Supplier Code of Conduct. If a Supplier should fail to comply with the applicable corporate responsibility standards outlined in the ORLEN Capital Group Supplier Code of Conduct, we will expect the Supplier to undertake remedial measures. We count on our Suppliers' cooperation in the implementation of the guidelines set in the ORLEN Capital Group Supplier Code of Conduct and our ongoing relationship with the Suppliers will allow ORLEN Capital Group to verify the application of these guidelines, e.g. by reviewing Suppliers' documents and/or on the basis of an audit.

At the same time, we undertake to support our Suppliers in raising the necessary awareness and promoting best practices of corporate responsibility and in developing the Suppliers' businesses in line with the standards of corporate responsibility and sustainable development. We are positive that compliance with the standards outlined in this Code of Conduct will contribute to further improvement of our relationships and partnership with the Suppliers, and will boost our respective businesses.