

ANTI-CORRUPTION POLICY OF ORLEN CAPITAL GROUP

OUR VISION

ORLEN Capital Group operates in compliance with the highest standards of ethics.

OUR GOAL

Ensuring fair and transparent model of ORLEN Capital Group operations, guaranteeing trust, safety, unrestricted competition and value to all stakeholders of ORLEN Capital Group.

OUR OBLIGATIONS

- In our daily operations, we comply with the values and standards of conduct of ORLEN Capital Group.
- We do not tolerate any corruption practices consisting in abusing any positions or functions to obtain any undue financial or personal benefits.
- We are proactive building and verifying the awareness of ethical attitudes and corruption threats among our employees and vendors.
 - The managers of ORLEN Capital Group are obliged to create the work environment based on respect for standards of ethics and compliance with the applicable regulations.
 - We avoid any conflicts of interest likely to undermine our integrity and reliability.
- We follow the internal regulations of ORLEN Capital Group with respect to expenses and gifts.
- We identify and manage the risk of corruption-related abuse and threats responsibly and reliably.
 - We report and explain any violations of the applicable law and internal regulations on anti-corruption practices, and we initiate any disciplinary and corrective measures immediately.
- We comply with the provisions of anti-corruption regulations in all our business sites.

The Anti-Corruption Policy in ORLEN Capital Group was introduced by the decision of the Management Board President of PKN ORLEN S.A. Of 14 November 2018

- Corruption hampers economic development, violates unrestricted competition, increases the costs of business activity, reduces safety and quality of products and services which is likely to pose a threat to the interests and to compromise the image of any entity being a transaction party.
- Corruption and abuse connected with it entail the criminal liability of those engaged in such practices as well as consequences for the company. Acceptance of corruption makes it difficult to carry out business activity, reduces the possibility to promote services and products, may prevent obtaining public procurements, as well as threatens with high financial penalties.
- The Anti-Corruption Policy of ORLEN Capital Group reflects the international good practice in the area of preventing, discovering and responding to bribery, identification of technological, financial and reputational hazards connected with corruption, as well as any other corruption-related behaviour likely to jeopardise the business interests of ORLEN Capital Group.
- Effective corruption counteracting requires implementing root cause solutions, based on analysis of information available internally and externally.
- The anti-corruption solutions protect from corruption activities as defined by the law and also counteract mismanagement, incorrectly managed conflict of interests or the collusion of vendors if those are connected with corruption.
- Implementation of the Anti-Corruption Policy of ORLEN Capital Group improves security in relations with company vendors and reinforces internal communication.
- The Anti-Corruption Policy provides a formal basis for implementing the Anti-Corruption System in ORLEN Capital Group which regulates the relationship between employees, entities and individuals representing ORLEN Capital Group companies, vendors, suppliers, customers and government administration representatives.
- The Anti-Corruption System is a system of measures, forms and methods of counteracting and discovering corruption and related abuse implemented in ORLEN Capital Group companies, managed centrally by the Control and Security Department of PKN ORLEN S.A.
- The policy is aimed at the following, including but not limited to:
 - 1) Counteracting and discovering corruption practices by implementing root cause solutions;
 - 2) Identifying hazards, assessing the risks and undertaking activities that protect economic interests of ORLEN Capital Group companies;
 - 3) Initiating inspection or audit activities to assess the circumstances and determine the liability of those suspected of corruption, including employees

and representatives of ORLEN Group companies who neglect implementing and following anti-corruption standards;

- 4) Implementing the rules of procedure for employees and representatives of ORLEN Group companies to implement anti-corruption security, including counteracting abuse which may be grounded in corruption;
 - 5) Shaping the awareness of business decision-makers with respect to identifying corruption practices and counteracting them.
- The policy assumes the obligation to follow anti-corruption regulations in force in all the countries ORLEN Group companies operate by all employees and representatives of ORLEN Group companies.
 - The policy requires all employees and representatives of ORLEN Group companies to follow the rules of ethics, integrity and conduct in line with the applicable law in all their activities, including but not limited in business transactions with individuals, vendors, government institutions and social organisations.
 - The employees and representatives of ORLEN Group companies are prohibited from the following acts:

Venality

Employees and representatives shall not accept any material or personal benefit, or a promise of it, in connection with carrying out the activities performed for ORLEN Group companies, including for any act violating the law, or make performance of such an act conditional on receiving any material or personal benefit.

Bribery

Employees and representatives shall not grant any material or personal benefit to any government official in connection with the said function held by them. Employees and representatives shall not also undertake any acts aimed at inducing any government official to violate the law or to grant or promise any material or personal benefit to such a person for violating the law.

Influence peddling — paid passive favouritism

Employees and representatives shall not agree to intermeditate to get some business done in return for any material or personal benefit, or a promise thereof, pointing to their impact and position in ORLEN Group companies, or causing anyone to expect such impact or reaffirming their expectation of such impact.

Influence peddling — paid active favouritism

Employees and representatives shall not grant or promise to grant any material or personal benefit in return for intermediating with getting any business done in any government, local government institution, international or national organisation or foreign organisational unit distributing public funds, consisting in illegal impact on the decision, act or omission of the act by an official in connection with their function.

Management bribery

Employees and representatives shall not demand or accept any material or personal benefit, or a promise thereof, in return for abusing their rights or for neglecting their obligations, likely to result in a material hazard for ORLEN Group company they work for, or being an act of unfair competition or an unacceptable act of favouritism towards the buyer or recipient of the goods, service or benefit.

Tender manipulations

Employees and representatives shall not prevent or hamper any tender or make any arrangements with another person, acting to the detriment of the owner of the property, or an individual or an institution for the benefit of whom/which the tender is organised to obtain any material benefit.

Employees and representatives shall not, in connection with the tender, disseminate any information or withhold any material circumstances, important for the execution of the agreement being the tender subject or make any arrangements with another person, acting to the detriment of the owner of the property, or an individual or an institution for the benefit of whom/which the tender is organised.

- The Policy introduces the obligation to ensure possibilities for anonymous whistleblowing as well as the rules of accepting and giving gifts in ORLEN Group companies in connection with the business activity of employees and representatives.
- ORLEN Group companies train their employees and representatives with respect to counteracting corruption and responding to potentially corruptive circumstances.
- The Control and Security Department of PKN ORLEN S.A. shall be held liable for implementing and enforcing the Anti-Corruption Policy in PKN ORLEN S.A.