

Social

ETHICS



Environment

BUSINESS INTEGRITY



ORLEN

SUPPLIER CODE
OF CONDUCT

ORLEN Capital Group

INTRODUCTION

The ORLEN Capital Group is a leading company in the fuel and energy sector in Central and Eastern Europe. In view of a considerable scale of our activity, the manner of doing business adopted by us significantly influences everyday lives of millions of people, efficient functioning of thousands of organizations and the entire economy. Thus, enormous responsibility is imposed on us. Therefore, we put strong attention to the issue of Corporate Sustainability and Responsibility (CSR). We implement a business strategy which is consistent with interests of our environment and is based on responsible exploitation of resources.

The following VALUES of ORLEN Capital Group are the foundation of all our activities:



Responsibility - We respect our clients, shareholders, natural environment and local communities.



Development - We look for new possibilities.



People - Competences, cooperation and honesty are our assets.

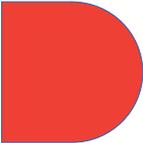


Energy - We act with enthusiasm.



Reliability – You can rely on us.

The ORLEN Capital Group Supplier Code of Conduct forms a set of principles are expected from our Suppliers to be followed.



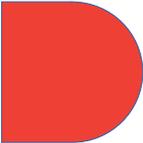
OUR OBLIGATIONS TOWARDS SUPPLIERS

ORLEN Capital Group continuously aims at achieving the highest standards of running a business activity and constantly requires implementation of the best solutions from ourselves. Also regulators, owners, our clients and employees expect this from us. We wish to build a culture of co-responsibility for business practices in the range of occupational health and safety, human rights, ethics in business, concern for employees and local communities as well as care of natural environment in all stages of our activity. This also refers to our supply chain and cooperation with Suppliers.

Therefore, we incorporate principles of corporate sustainability and responsibility into the purchasing processes, and *ORLEN Capital Group Supplier Code of Conduct* forms an integral element of the process of cooperation with Suppliers, including the process of their qualification and assessment.

In cooperation with Suppliers we are guided by corporate sustainability and responsibility principles. We support our Suppliers in raising awareness and in developing practices within this scope. We are of the opinion that thanks to dialogue and cooperation with Suppliers for the benefit of corporate sustainability and responsibility we can successfully develop our business and positively influence our Suppliers.

We believe that such an attitude will bring benefits to us, our Suppliers as well as our social and business environment.



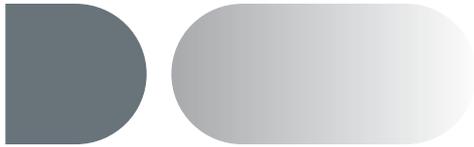
OUR EXPECTATIONS TOWARDS SUPPLIERS

We cooperate with the best Suppliers who continuously improve their activities in order to satisfy the increasing market expectations. We encourage them to develop and improve responsible business practices according to the guidelines of *ORLEN Capital Group Supplier Code of Conduct*.

We want to cooperate with Suppliers who understand and share our attitude to corporate sustainability and responsibility, pursue improvement and development of their good practices in areas in which we set ambitious goals to ourselves and which are crucial to us:



SOCIAL STANDARDS



1.1. Assurance of safety in a workplace and health of employees

- a. A supplier complies with all legal provisions in the range of occupational health and safety in a country of origin.
- b. A supplier ensures safe and healthy conditions for performance of work by implementing procedures, certified systems for management of OHS and/or own safety programmes, good practices and solutions aimed at completely eliminating accidents, avoiding injuries and diseases amongst employees of a supplier, caused by performed work.
- c. A supplier seeks to mark out goals in the range of safety in order to minimise hazards - monitors, analyses and documents achievement of these objectives and implementation of his activities pursuing constant development of occupational safety.



1.2. Aiming at ensuring dignified and non-discriminatory working conditions

- a. A supplier complies with all labour law provisions in a country of origin.
- b. A supplier ensures equal access to dignified working conditions for all types of employment contracts legally acceptable in a country of origin.
- c. A supplier does not accept mobbing in a workplace.
- d. A supplier in a responsible manner manages employees and workplace (e.g. ensuring development of employees' competences, assurance of occupational safety, balance between professional and private lives of employees etc.) and determines his objectives in this area.



1.3. Observation of human rights

- a. A supplier ensures equal treatment in a workplace and does not apply, in his activity, any practices discriminating employees and other stakeholders (e.g. his clients) in view of age, gender, disability, racial origin, religion and any other criterion.
- b. A supplier respects the right of employees to organise.
- c. A supplier ensures respect of human rights in his activity



ENVIRONMENTAL STANDARDS



2.1. Constant improvement in the area of managing an impact on natural environment

- a. A supplier observes legal provisions in the range of an impact of his activity on natural environment.
- b. A supplier assesses his activity from the perspective of a risk of a negative influence on environment and makes an effort to prevent this risk.
- c. A supplier seeks to mark out objectives to reduce a negative impact of his activity on natural environment (e.g. in the form of an environmental policy or another binding document).



2.2. Responsible acquisition and exploitation of raw materials

- a. A supplier seeks to gain raw materials in a responsible manner, taking care of natural environment and/or to consider environmental criteria in his purchasing decisions.
- b. A supplier seeks to reduce consumption of raw materials and natural resources, including water, and to manage them rationally.



2.3. Minimisation of greenhouse gas emissions

- a. A supplier seeks to minimise emissions of greenhouse gases, including carbon dioxide, arising directly or indirectly from the supplier's activity within the scope adequate to a scale and type of activity carried out by the supplier.

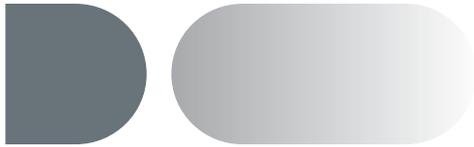


2.4. Responsible waste management

- a. A supplier observes all legal regulations concerning waste management.
- b. A supplier seeks to minimise generation of waste connected with conducted activity.
- c. A supplier ensures proper management of generated waste, including cooperation with authorised recipients of generated waste in order to minimise a risk of negative impact of waste on natural environment.



ETHICAL STANDARDS
AND MANAGEMENT SYSTEMS



3.1. Responsible management of the impact of his activity on society and natural environment

- a. A supplier has determined objectives of corporate sustainability and responsibility together with implementation measures in the form of a policy, strategy, declaration or another binding document.

In order to develop business and manage his impact on the environment and quality of social life in a responsible manner, it is worth determining and registering goals within this scope in a form that is comprehensible to employees and other stakeholders. Therefore, Suppliers of ORLEN Capital Group should have determined and registered their priorities in the range of environmental protection, social issues (e.g. those which are stipulated by this *ORLEN Capital Group Supplier Code of Conduct*) and management standards.



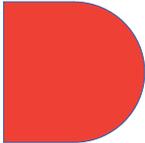
3.2. Prevention of corruption

- a. A supplier prevents any forms of corruption in his activity and implements preventive practices.
- b. If any form of corruption is identified, a supplier takes firm remedial steps preventing other incidents of this type.



3.3. High ethical standards of running an activity

- a. A supplier applies ethical conduct principles in each area of running his activity.
- b. A supplier aims at implementing solutions (e.g. trainings for employees in practical use of the conduct code in a workplace etc.) raising awareness of ethical conduct principles in a workplace amongst employees and management staff.



FINAL PROVISIONS

The ORLEN Capital Group Supplier Code of Conduct is directed to all Suppliers and Contractors cooperating with ORLEN Capital Group.

We expect that our Suppliers will constantly develop in the range of the social, environmental, ethical standards determined in the *ORLEN Capital Group Supplier Code of Conduct* and in the range of management.

If activities of Suppliers are inconsistent with the standards of responsible business stipulated in the *ORLEN Capital Group Supplier Code of Conduct*, we await Suppliers to undertake remedial measures. *ORLEN Capital Group* expects that due to the relationship with Suppliers of ORLEN Capital Group will be able to verify the application of the guidelines of the *ORLEN Capital Group Supplier Code of Conduct* by the Supplier e.g. through an analysis of Suppliers' documents and/or an audit of a Supplier.

At the same time, we undertake to support our Suppliers in raising awareness of responsible business practices and in developing Suppliers' activities in accordance with the standards of corporate sustainability and responsibility. We believe that compliance with the standards of the *Code* will contribute to enhancement of our cooperation and partnership with Suppliers and will strengthen the development of our activity and the activities of our Suppliers.