# Management Board's Report

# 2025

on the operations
of the ORLEN Group and ORLEN S.A.
in 2025





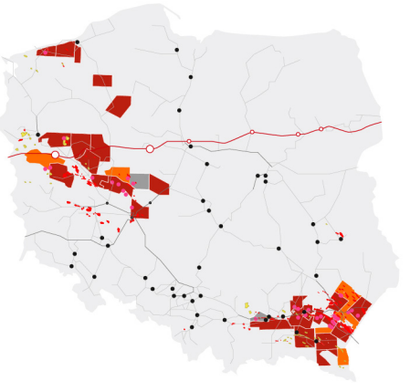






## UPSTREAM & SUPPLY





- Drilling operations
- Oil production licences
- Gas production linces
- Total licences
- Exploration licences
- Relinquished licences
- Gas transmission infrastructure

## DOWNSTREAM




- Refining assets
- Petrochemical assets
- Maximum annual processing capacity [million tonnes]

*Total refining capacity, including a 30% share of Saudi Aramco.



## CONSUMERS & PRODUCTS

**Poland** (since 1999)
35% – market share*
1964 – service stations

85% – share in the retail gas market
10% – share in the electricity market
7 mln – number of non-fuel retail customers

**Germany** (since 2003)
6% – market share*
605 – service stations

**Lithuania** (since 2009)
4% – market share*
30 – service stations

**Czech Republic** (since 1953)
29% – market share*
446 – service stations

**Slovakia** (since 2019)
8% – market share*
99 – service stations

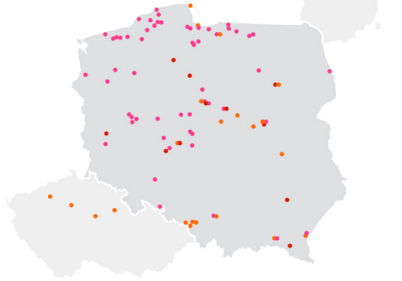
**Austria** (since 2024)
9% – market share*
263 – service stations

**Hungary** (since 2022)
7% – market share*
139 – service stations

*Retail fuel market

## ENERGY

- Conventional assets (6,4 GWe capacity)
- Renewable energy assets (1,7 GWe capacity)
- Heating (14,0 GWt capacity)



- Gas distribution area
- Electricity distribution area



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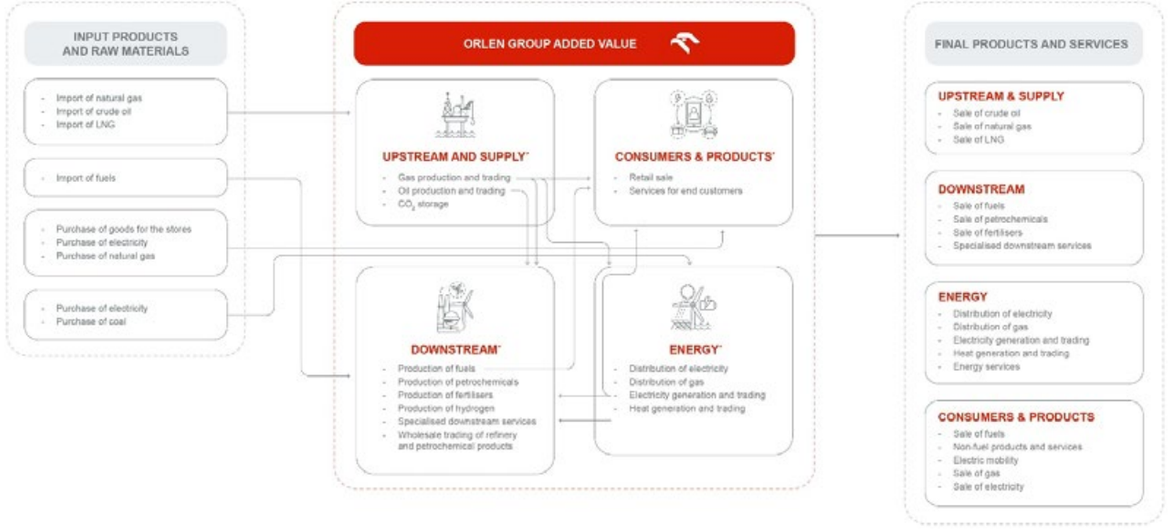

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# 1. ORLEN Group's business model and structure

## 1.1 Business model

The ORLEN Group (the „ORLEN Group", the "Group", "we") is the largest multi-energy group in Central and Eastern Europe, with integrated operations spanning the entire energy value chain, from hydrocarbon production, through to processing and energy generation, to distribution and retail sales. Our operations are organised into four business segments: Upstream & Supply, Downstream, Energy, and Consumers & Products.

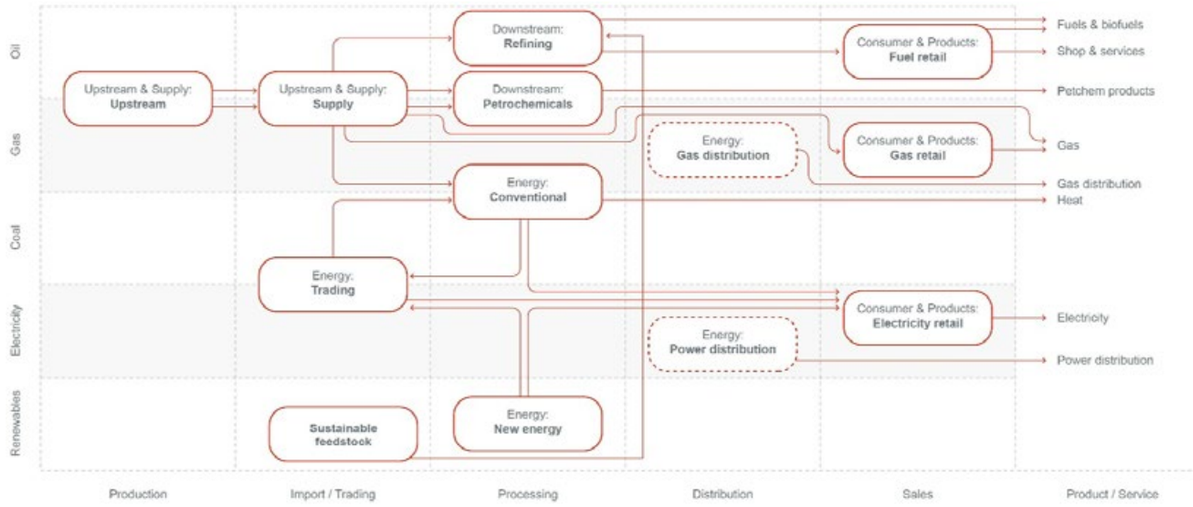
Figure 1 ORLEN Group business model




* **Upstream** and Supply: ORLEN Upstream Polska Group, Lotos Upstream Group, ORLEN Petrobaltic Group, GEOFIZYKA Toruń S.A., ORLEN Upstream North Africa B.V., ORLEN Upstream Norway Group, ORLEN Energy Trading Group, ORLEN Technologie S.A., ORLEN GAZOPROJEKT S.A., Exalo Drilling Group, GAS-TRADING Group, LLC Karpatgazvydobuvannya, ORLEN SPV1 Sp. z o.o. in liquidation, ORLEN SPV6 Sp. z o.o., ORLEN SPV10 Sp. z o.o.
**Downstream**: ANWIL S.A., Innowrocławskie Kopalnie Soli „Solino" S.A., ORLEN Laboratorium S.A., ORLEN Lietuva Group, ORLEN Asfalt Group, ORLEN Eko Group, ORLEN Oil Sp. z o.o., ORLEN Paliwa Sp. z o.o., ORLEN Projekt Group, ORLEN Aviation Sp. z o.o., ORLEN Południe Group, ORLEN UNIPETROL Group, ORLEN Serwis Group, ORLEN Transport Group, ORLEN Olefiny Sp. z o.o. in liquidation, ORLEN Kolej Group, ORLEN Trading Switzerland GmbH, LOTOS Green H2 Sp. z o.o., ORLEN International Trading (SUZHOU) Co., Ltd., S 54 Sp. z o.o.
**Energy**: ORLEN Południe Group, ORLEN New Power Group, ORLEN Energia Sp. z o.o., ORLEN Neptun Group, ORLEN TERMIKA Group, Polska Spółka Gazownictwa Group, ORLEN Biometan Group, System Gazociągów Tranzytowych EUROPOL GAZ, ENERGA Group, ORLEN Lietuva Group, ORLEN UNIPETROL Group, ORLEN Energomedia Operator Sp. z o.o.
**Consumers and Products**: ORLEN UNIPETROL Group, ORLEN Deutschland Group, ORLEN Centrum Serwisowe Sp. z o.o., ORLEN Budonaft Sp. z o.o., AB ORLEN Baltics Retail, Uslugi logistyczne Group in liquidation, ORLEN Austria Group, ORLEN Paczka Sp. z o.o., re58 S.A., SOLGEN Sp. z o.o., ENERGA Group, myORLEN Sp. z o.o.
Corporate Functions: ENERGA Group, ORLEN Centrum Usług Korporacyjnych Sp. z o.o., ORLEN UNIPETROL Group, ORLEN Holding Malta Group, ORLEN Capital AB, ORLEN Usługi Finansowe Sp. z o.o., Polska Press Group, ORLEN Administracja Sp. z o.o., ORLEN Nieruchomości Sp. z o.o. in liquidation, ORLEN Straż Gdańsk Sp. z o.o., ORLEN Ochrona Group, ORLEN VC Sp. z o.o., ORLEN Lietuva Group

The value chain presents the ORLEN Group's activities from the sourcing of feedstocks and energy, through to their processing and trading, to the distribution and sale of products and services to end customers. It shows how our business segments are interconnected and complement one another, enabling the efficient management of flows of feedstocks, energy and products across the ORLEN Group and value creation at every stage of our operations.

Figure 2 Value chain



## 1.2 Structure of the ORLEN Group

As at 31 December 2025, ORLEN S.A. held direct and indirect equity interests in nearly 340 companies.

As at 31 December 2025, the ORLEN Group consisted of the parent and 179 companies over which the parent had direct or indirect control, as defined in International Financial Reporting Standard 10 (IFRS 10).

A detailed description of the organization of the ORLEN Group and changes in its structure are presented in Section 8.6 of this Report.

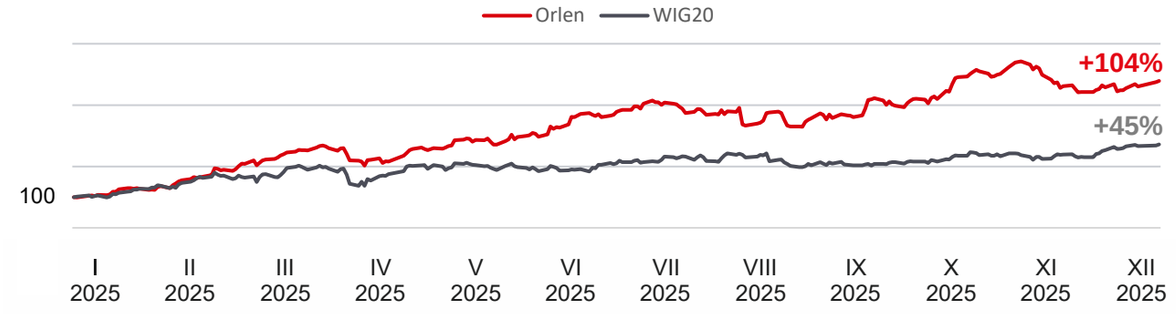
## 1.3 ORLEN share performance on the stock exchange

### ORLEN S.A. share price

ORLEN S.A. shares are listed on the main market of the Warsaw Stock Exchange, in the continuous trading system, and are a constituent of the WIG, WIG20, WIG30, WIG-Poland, and WIG-ESG indices, as well as the WIG-PALIWA index of the fuel and gas sector.

In 2025, the broad-based WIG index reached a record high, ending the year 47.3% higher. The main driver behind the gains was large-cap stocks, with WIG20 advancing 45.3% year on year. Over the same period, ORLEN share price rose 103.6% year on year. Factoring in dividend and its reinvestment, the total return on the Company's stock was 119.2%, and the total stock trading volume reached 675.1 million shares.

Chart 1 ORLEN share price performance on the WSE against adjusted WIG20 index in 2025




Source: In-house analysis based on WIG performance data.

### Stock performance

Table 1 Key stock exchange data

| Key data | | 2025 | 2024 | 2023 |
|---|---|---|---|---|
| **Net profit attributable to owners of the Parent[1)]** | **PLN million** | **2,531** | **2,826** | **20,922** |
| High | PLN | 104.00 | 72.93 | 71.49 |
| Low | PLN | 49.25 | 46.32 | 54.60 |
| Year-end share price[2)] | PLN | 96.11 | 47.20 | 65.50 |
| **EV/EBITDA[3)] at year-end** | | **4.55** | **2.61** | **1.71** |
| Number of shares outstanding | number | 1,160,942,049 | 1,160,942,049 | 1,160,942,049 |
| Year-end market capitalisation | PLN million | 111,578 | 54,796 | 76,042 |
| Average daily trading value | PLN million | 204 | 128 | 139 |
| Average daily trading volume | number | 2,711,199 | 2,114,583 | 2,206,063 |

1) Net profit excluding impairment losses.
2) Based on share prices at close of trading.
3) EV/EBITDA: Enterprise Value (market capitalisation - net debt + minority interests)/EBITDA (earnings before interest, taxes, depreciation and amortisation)

## Key developments in 2025

**9 January**
ORLEN Group strategy to 2035 is published, with a new dividend policy providing for an annual increase in the guaranteed dividend of PLN 0.15 per share

**29 January**
Series C bonds with a nominal value of USD 1.25 billion are issued

**19 February**
Debt financing of PLN 7.5 billion is secured from the National Recovery and Resilience Plan (KPO) under agreements with Bank Gospodarstwa Krajowego to fund the development and expansion of a modern electricity distribution network

**27 February**
ORLEN S.A. Management Board recommends distribution of dividend of PLN 6.00 per share from the 2024 profit

**3 March**
Agreement is signed with Equinor ASA on the deployment of the Carbon Capture and Storage (CCS) technology in Poland

**4 March**
Fitch Ratings agency's rating is maintained at BBB+, with a stable outlook

**20 March**
PLN 1.7 million debt financing agreement is executed with EBI to fund an investment programme for the development of a modern electricity distribution network; total amount of EIB support: PLN 3.5 billion

**5 June**
ORLEN S.A. Ordinary General Meeting resolves to distribute dividend of PLN 6.00 per share from the 2024 profit

**17 June**
ORLEN secures PLN 1.7 billion in non-repayable funding from the National Recovery and Resilience Plan (KPO) under agreements with BGK for hydrogen projects

**30 June**
Green Series D bonds are issued, with a nominal value of EUR 600 million

**22 August**
A hydrocarbon field with estimated recoverable reserves of approximately 134 million boe is discovered in the North Sea

**27 August**
Magdalena Bartoś and Artur Osuchowski are removed from the ORLEN S.A. Management Board

**28 August**
Agreement is signed with Synthos S.A. to construct Poland's first small modular reactor (SMR) plant in Włocławek (through ORLEN SYNTHOS GREEN ENERGY Sp. z o.o.)

**29 August**
Contract is executed with Equinor ASA for the supply of 6 million tonnes of crude oil from the Norwegian field Johan Sverdrup, covering approximately 15% of the ORLEN Group's annual oil requirement

**22 September**
Sławomir Jędrzejczyk and Sławomir Staszak are appointed to the ORLEN S.A. Management Board

**18 December**
Agreement is signed with Synthos S.A. to purchase shares in a company constructing a new butadiene extraction unit at the production plant in Płock

**18 December**
Baltic East project wins an offshore wind auction held by the President of the Polish Energy Regulatory Office (URE)

**26 November**
Invitation to tender ENERGA S.A. shares for sale is issued to ENERGA S.A. shareholders

**28 October**
ORLEN secures a PLN 3.5 billion guarantee for debt financing from the National Recovery and Resilience Plan (KPO) under agreements with BGK for the development of offshore wind farms

**15 October**
Non-binding offer is submitted for the acquisition of all shares in Grupa Azoty Polyolefins S.A., a company implementing a plastics production project

# 2. ORLEN Group strategy

## Market trends driving ORLEN Group strategy

We are pursuing our long-term strategy to 2035, taking into account the global decarbonisation trend and increasingly stringent regulatory requirements. The strategy responds to one of the key challenges, namely the responsible energy transition, which requires gradually moving away from fossil fuels while ensuring the continued stability of energy supply. Central and Eastern Europe is experiencing dynamic growth, yet sustaining this momentum will require a careful balance between the robust demand for traditional energy sources and the accelerating decarbonisation efforts.

The region stands out with a relatively higher economic growth rate compared to Western Europe. Its economies continue to evolve, increasingly driven by human capital, attractive investment conditions, and a shift toward high-tech industrial sectors – factors that continue to attract foreign direct investment. As a result, energy demand is expected to rise, along with the need to reduce emissions from the energy sector. However, the pace of this transition will differ from that in Western Europe. Over the coming decade, fossil and conventional fuels will likely remain in high demand, while transport electrification and the phase-out of fossil-based energy generation are expected to progress at a slower rate. The lasting change in the directions of energy commodity supplies in Central Europe and reduced dependence on hydrocarbons from countries east of Poland form the foundation of the region's new energy security architecture.

Our response to this challenge is a pragmatic energy transition, one that combines maximising value across our traditional business areas with a methodical approach to decarbonising our assets and scaling renewable energy solutions.

Reducing $CO_2$ emissions and aligning our operations with growing ESG expectations are essential for long-term competitiveness. Integrating carbon-reducing technologies, such as carbon capture and storage (CCS), expanding renewable energy capacity, and investing in zero-carbon fuels, has become a key element of our business model. Since 2025, the European Union's approach to the energy transition has also been evolving, with greater emphasis placed on industrial competitiveness and energy security, fostering a more pragmatic transition model in Central Europe.

Against the backdrop of market and geopolitical instability, another major challenge is the need to secure stable supplies of raw materials and diversify their sources. We are working to increase the flexibility of our oil and gas supply portfolio. Long-term gas supply contracts, the development of LNG infrastructure and the integration of regional energy markets are gaining strategic importance. Ensuring energy security and mitigating the risk of supply disruptions are critical components of our long-term strategic outlook.

## Strategic development directions

Our strategy to 2035 focuses on integrating ORLEN Group's existing business segments and building an organisation that, over the next decade, will become more resilient to fluctuations in its business environment. We will be better positioned to effectively manage the entire value chain, from raw materials and production to the delivery of finished products to customers. Increased transparency of our operations will also enable more precise identification of areas for optimisation in response to evolving market requirements. This will drive down operating expenses, improve service quality, and enhance the overall competitiveness of the ORLEN Group. Integration of our business segments will not only strengthen our market position, but will also enhance our flexibility and the capacity to respond swiftly to market dynamics and emerging challenges.

Our strategy is anchored in a pragmatic transformation that addresses key regulatory and business challenges and opportunities, while also being tailored to the specific needs and characteristics of the region.

One of the objectives of the planned transformation is to increase gas production and imports, which is expected to improve energy security. In parallel, we plan to strengthen our presence in the energy sector through investments in renewable energy sources, CCGT projects, and the modernisation of our refining and petrochemical assets.

Energy is expected to become the Group's fastest-growing segment, with a substantial regulated-business component, an approximately 20% contribution to total EBITDA, and a complementary mix of renewable energy assets and CCGT plants. Growth of the Energy segment will also support the decarbonisation of our refining and petrochemical operations.

One result of this operational integration will be the Consumers & Products segment, through which end-users will benefit from lower-carbon energy sources, fuels, and services. The overarching goal of our strategy is to build a more sustainable organisation that can adapt to shifting market conditions.

The new ORLEN Group strategy will create an integrated, cohesive and digitally-enabled organisation in which each business line complements the others, enabling us to deliver products and services aligned with customer expectations. The transformation of our traditional operations will fuel expansion into new growth areas, and a diversified business model will be more resilient to market changes.

A cross-cutting objective of our strategy is to reduce $CO_2$ emissions through a number of measures, such as developing expertise in sustainable raw materials, hydrogen, biofuels, and small-scale

nuclear generation (SMRs). Investments in projects within the innovative and sustainable product portfolio pillar will not only expand the Group's low- and zero-carbon energy capacity, but will also supply sustainable raw materials for next-generation products and open up new business areas that complement ORLEN's traditional operations.

## Capital allocation strategy

We have established capital allocation criteria for our investment projects that include minimum return thresholds (hurdle rates) tailored to the specific characteristics of individual business lines and different project types, including their impact on carbon emissions. Initiatives supporting $CO_2$ emissions reduction may yield relatively lower returns than those increasing our carbon footprint.

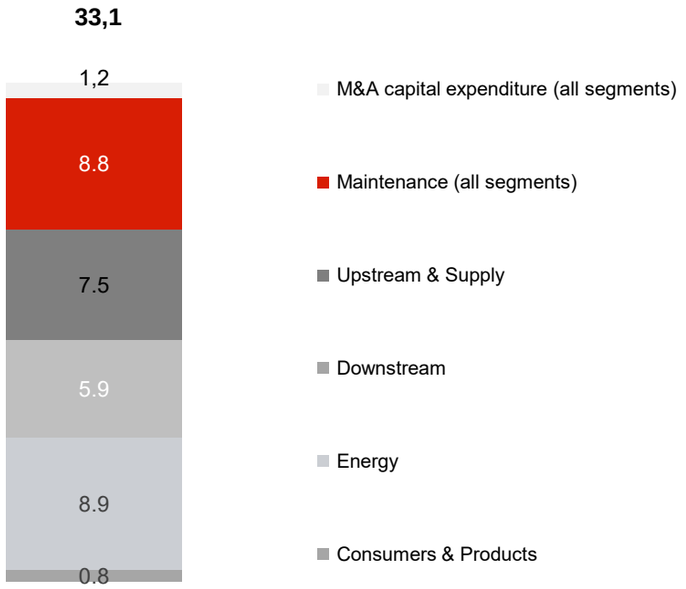
Another factor differentiating the expected rate of return is the allocation of investments to our strategy pillars. Projects with high strategic potential, as well as optimisation and innovation projects or investments in our sustainable product portfolio, may carry a lower expected rate of return than investments in areas of lesser strategic importance, where the objective is to maximise value over a shorter time horizon.

### Assessment of investment plan delivery

Our financial situation is stable, with adequate cash flows and available financing sources, including funding from the European Union for innovation and energy transition measures, to support the implementation of our investment plans.

In 2025, the amount allocated across the ORLEN Group to investments in energy supply security and the development of modern zero- and low-carbon energy sources totalled PLN 33.1 billion.

Chart 2 Capital expenditure in 2025




In the Upstream & Supply segment, in 2025 work continued on the development of the Fenris and Ørn fields, as well as the Yggdrasil area in Norway.

In the Downstream segment, we incurred expenditure on the New Chemistry monomer units in Płock, a hydrocracking unit in Mażeikiai, a hydrocracked base oil unit in Gdańsk, rapeseed oil pressing plants in Kętrzyn, and HVO unit in Płock.

In the Energy segment, projects under way included offshore wind farms in the Baltic Sea, CCGT units in Ostrołęka and Grudziądz, and solar PV farms.

# 3. Business environment

## 3.1 Market environment

Table 2 Average annual macroeconomic data

| | 2025 | 2024 |
|---|---|---|
| Brent crude price [USD/bbl] | 69.1 | 80.8 |
| Model refining margin[1] [USD/bbl] | 13.1 | 11.0 |
| Price differential[2] [USD/bbl] | -1.0 | -0.2 |
| Model petrochemical margin[3] [EUR/t] | 165 | 197 |
| TTF month-ahead gas price [PLN/MWh] | 154 | 149 |
| TGEgasMA gas price [PLN/MWh] | 172 | 169 |
| TGEBase electricity price [PLN/MWh] | 443 | 415 |
| USD / PLN[4] | 3.76 | 3.98 |
| EUR / PLN[4] | 4.24 | 4.31 |

1) Model refining margin = revenue (33% gasoline + 48% diesel oil + 13% heavy fuel oil) - costs (98% Brent oil + 2% natural gas). Spot market quotations.
2) Calculated on the basis of the actual shares of the crude oil types processed. Spot market quotations.
3) Model petrochemical margin = revenue (25% HDPE [spot] + 16% PP Homo [spot] + 9% ethylene [contract] + 7% toluene [Contract] + 14% benzene [contract]) - costs (75% naphtha + 13% heavy fuel oil + 13% LPG [spot]) - 6% $CO_2$ emission costs [EUAs].
4) Average exchange rates as quoted by the National Bank of Poland.

### Gas market

At the start of 2025, natural gas demand in Europe was strongly influenced by the cold weather at the end of winter as well as concerns about low stock levels, which kept average spot prices on European markets relatively high during that period.

From late February, however, prices fell sharply, driven by rising temperatures and growing market conviction that the EU's gas storage targets for the following winter season would be relaxed. The downward trend was further amplified by market uncertainty over the potential impact of new US tariffs on the global economy, first announced in April 2025.

In the second half of the year, lower prices on European markets were mainly attributable to weak demand signals and expectations of growing global LNG supply. Local supply also remained strong, particularly due to robust deliveries from Norway, which ensured high and stable volumes of gas transmitted by pipelines from the Norwegian Continental Shelf.

Despite relatively low storage levels, the period from the start of winter to the end of 2025 brought no strong triggers for price increases. Supply conditions remained relatively comfortable and the market stayed stable, even as the first cold spell set in. This was supported by rising global LNG supply resulting from the commissioning of new export capacities, particularly in the United States.

Geopolitical developments with the strongest impact on Europe's gas markets in 2025 included changes in the US economic policy paradigm, namely plans to increase hydrocarbon production and LNG exports, and impose higher tariffs on trading partners.

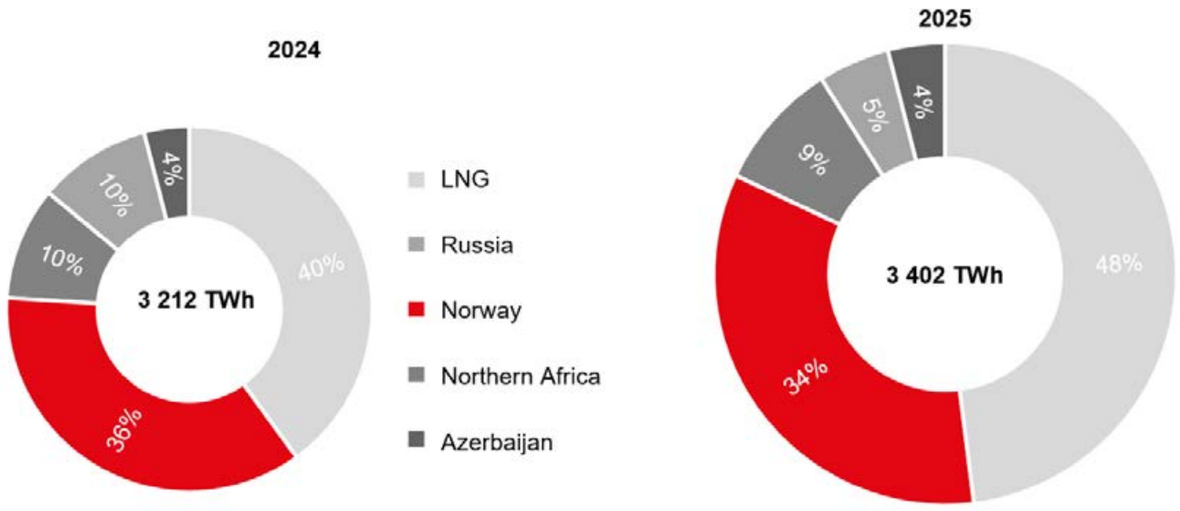
Contrary to expectations, LNG demand from China remained relatively low, down by more than a dozen per cent year on year. Further growth in domestic gas production, closer gas supply cooperation with Russia, including expanded capacity of the Power of Siberia pipeline, and lower storage requirements following a mild winter combined to reduce competition on the global LNG market and increase the available supply in the Atlantic Basin.

At the end of July, a trade agreement was reached between the United States and the European Union. In addition to lower tariffs, it is expected to include purchases of energy products from the United States worth USD 750 billion over three years, including LNG.

Another factor shaping the gas market landscape was the prospect of an end to the war in Ukraine, along with US announcements concerning sanctions on Russia and buyers of its energy commodities. At times, this pushed prices higher on expectations of lower global supply. The European Union approved the implementation of the RePowerEU regulation, aimed at phasing out existing contracts with Russian natural gas suppliers and banning the conclusion of new ones. LNG supplies, particularly to countries in North-Western Europe, are to end by 1 January 2027, while pipeline supplies, particularly those reaching Hungary and Slovakia, are to cease no later than 1 November 2027, or by 30 September 2027 if storage targets are met.

2025 was the first year without Russian gas being delivered by pipelines through Ukraine. After the transit agreement between the two countries expired, Central European buyers switched to supplies from other directions. This coincided with Germany's abolition of the gas storage neutrality charge, which had constrained natural gas trading in the region. As a result, the cost of transporting gas from Germany to Central European countries fell by an average of 60%.

Chart 3 Main gas sourcing in Europe* in 2024 and 2025




*excluding local production

Source: In-house analysis based on transmission operators' data.

## LNG

Global LNG trade grew by 4.8% year on year in 2025, with total deliveries of natural gas after regasification exceeding 6,537 TWh. This strong growth relative to 2024 was driven chiefly by new export capacity coming on stream, primarily in the United States. The highest LNG export volumes were once again reported by the United States, at 1,637 TWh. The largest increase in LNG imports was seen in Europe, which accounted for 27% of global imports, with LNG deliveries rising by almost 29% year on year (406 TWh). The annual growth of LNG imports in Poland was similar to the European level. In 2025, Poland's LNG import volume represented approximately 5% of European LNG demand.

## Gas demand in Poland and its structure

Poland's natural gas demand is met through a combination of domestic production and imports, with imported gas entering Poland via interconnectors and the LNG terminal in Świnoujście. Gas is traded on the Polish Power Exchange (POLPX) and through bilateral contracts in the over-the-counter (OTC) market. The national gas system is further supported by gas storage facilities.

Domestic consumption of high-methane grid gas was about 212 TWh in 2025, which means an increase of 6.8%, or 13 TWh, compared with 2024. The largest rebound in consumption was seen among customers connected to the transmission network (up by 10.8% year on year), driven by growing gas demand from the power sector. Gas volumes consumed by distribution network customers expanded by 5.3% year on year, with the key contributing factor being lower temperatures recorded in the 2025 heating season.

## Import

In 2025, Poland's gas imports rose to 208.8 TWh, up 23% year on year. Supply via the Baltic Pipe increased by 23% from the previous year, reaching 96.9 TWh. Gas delivered through this route accounted for 46% of total imported volumes. LNG regasification volumes totalled 87.5 TWh in 2025, representing 42% of total imports and making LNG regasification the second-largest source of gas supplied to the transmission network. The balance of gas supplies from the EU via interconnectors with Germany, the Czech Republic, Lithuania, and Slovakia grew by 123% year on year to 24.33 TWh.

## Gas storage

In 2025, the gas storage sector continued to operate within an EU regulatory framework setting minimum fill requirements. In July 2025, a regulation was adopted extending the obligation to fill storage facilities to 90% for a further two years, that is until the end of 2027. Under the new rules, the deadline for meeting the target was made more flexible: it was changed from 1 November to the period between 1 October and 1 December. Furthermore, Member States were allowed to deviate from the target by up to 10 percentage points in the event of difficult market conditions. The European Commission may increase that permitted deviation by a further 5 percentage points.

Although the EU exceeded its storage-filling target in 2024, gas stock levels had been significantly depleted by the end of the first quarter of 2025, at only 34%, that is 11 percentage points below the five-year average. Europe entered the 2025/2026 winter season with the lowest storage levels since the gas crisis began in 2021.

At the end of the 2024/25 winter season, Polish gas storage facilities were 43% full, almost the same level as in the previous winter season. Steady injections during the summer made it possible to refill the facilities to full capacity. Gas withdrawals from storage did not begin until late November, and at the end of 2025 storage levels in Poland stood at 84%, slightly below the level recorded a year earlier.

## Crude oil market

2025 was the first full year of a structural oversupply in the crude oil market after the tight conditions seen in 2022–2024. Supply rose by around 3 million barrels per day year on year, while demand increased by only 0.7–0.8 million barrels per day. Geographically, supply growth was influenced mainly by non-OPEC+ countries, including the United States, Brazil, Canada, Guyana and Argentina. Demand growth, in turn, came mainly from non-OECD economies, especially China and India,

In structural terms, demand was supported by inventory builds (oil stocks in China; 'oil on water', i.e. crude in transit or floating storage) rather than by global refinery throughput, which rose only moderately. This supply-demand picture was reflected in oil prices, which remained on a downward trend, falling from a high of USD 83.06 per barrel in early January 2025 to USD 60.20 per barrel at the end of the year. Despite persistent geopolitical risks (the Middle East and the Iran-Israel-US conflict as the main systemic risk, the Russia-Ukraine war as an infrastructure risk, and sanctions on Russia and Iran as a political risk), Brent spot prices were ultimately driven by excess supply.

The market expects all demand growth to be fuelled by non-OECD countries, especially China and India. Demand in OECD countries is expected to remain flat or edge slightly lower. Petrochemicals are likely to be the chief driver of oil demand, with conventional fuels playing a lesser role. At the same time, the market continues to show a tendency towards inventory build-up, including in OECD countries, China, and the 'oil on water' volumes mentioned above.

## Electricity market

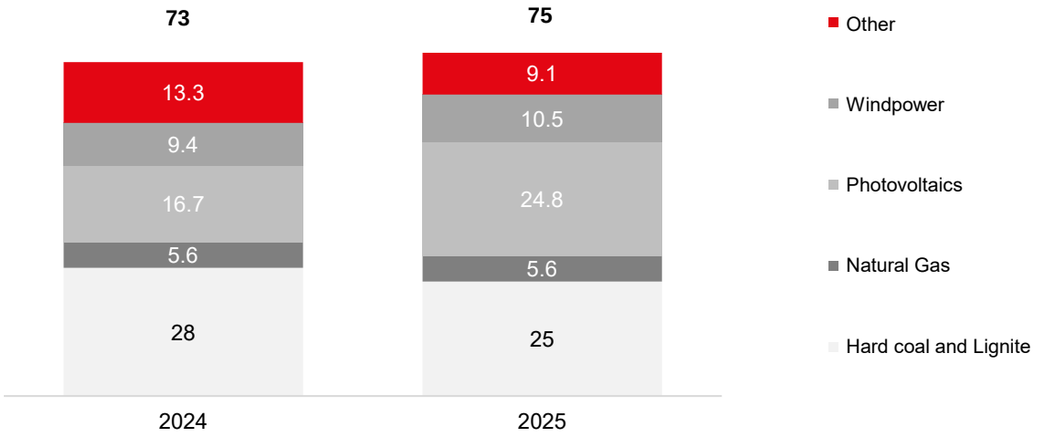
According to data from Polskie Sieci Elektroenergetyczne (PSE), electricity consumption in Poland fell by 0.87% year on year in 2025, to approximately 167.5 TWh. As in previous years, industry and services accounted for the largest share of total consumption, while household demand remained relatively stable.

A number of factors may have contributed to lower electricity demand in Poland in 2025, including:

- improved energy efficiency in the economy;
- the continued growth of solar capacity, strong renewable generation in the spring and summer months, and rising self-consumption, which reduced demand for electricity drawn from the grid;
- weather conditions, including a relatively mild winter and the absence of prolonged summer heatwaves, which curbed electricity use for heating and cooling;
- subdued activity in some energy-intensive sectors;
- wholesale market price volatility and regulatory changes, including the expiry of statutory maximum electricity prices for local governments, public institutions, and micro-, small- and medium-sized enterprises, which may have encouraged more efficient electricity use and dampened demand.

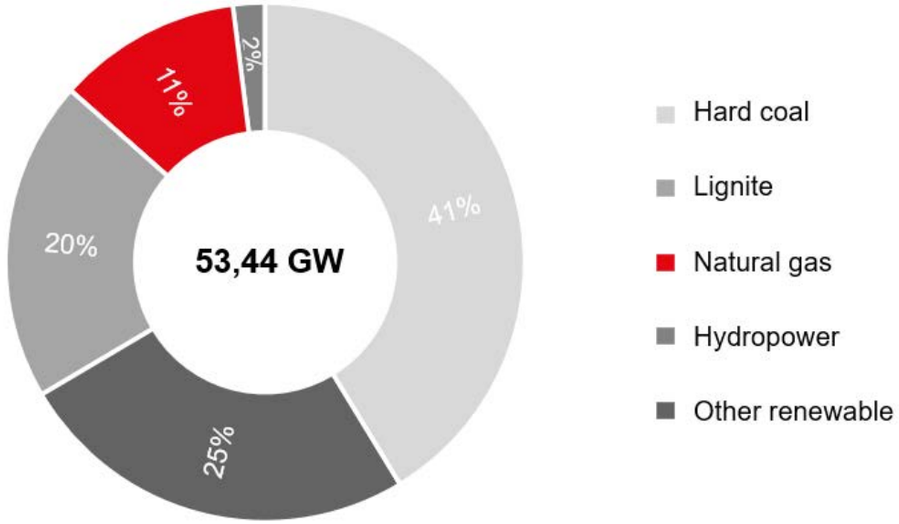
According to preliminary PSE data, electricity generation in Poland totalled approximately 166.5 TWh in 2025, down by around 0.29% compared with 2024.

Chart 4 Installed electrical capacity in Poland* in 2024 and 2025 [GW]




* Based on Energy Market Agency's data.

Chart 5 Breakdown of the generation mix by primary energy source in 2025




In December 2025, installed capacity in hard coal-fired power plants stood at 21.91 GW, down 3.27% year on year from 22.65 GW. Installed capacity in lignite-fired plants totalled 7.62 GW, representing a 14.03% year-on-year decline from 8.86 GW. By contrast, gas-fired capacity rose by 8.03% to 6.12 GW, compared with 5.66 GW at the end of 2024.

## 3.2 Market prices

### Global and European gas prices

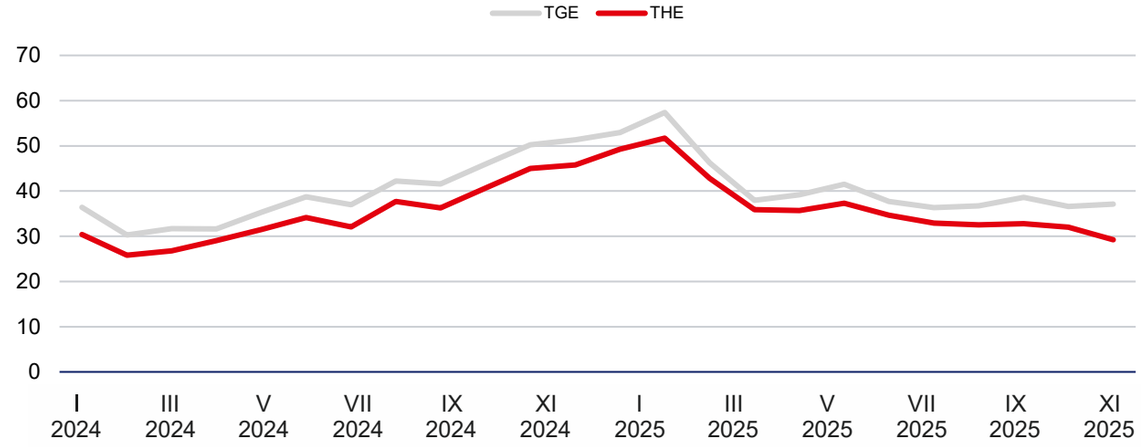
The average spot price of natural gas in Europe (understood as the price on the TTF, the most liquid European gas trading hub), rose from EUR 34.34/MWh in 2024 to EUR 36.10/MWh in 2025, an increase of 5% year on year. The average price spread between the THE and TTF markets in 2025 was EUR 1.03/MWh.

In 2025, the average front-month natural gas price at the Dutch TTF hub was EUR 38.15/MWh, marking a 12.6% increase on 2024. Similarly, front-month natural gas prices at the Henry Hub rose to EUR 10.76/MWh from an average of EUR 7.32/MWh over the same period. Consequently, the average price spread between the European and US trading hubs expanded by EUR 0.82/MWh, to EUR 27.27/MWh, a 3.1% change year on year.

### Gas prices in Poland

In 2025, the average spot price (RDNiBg) of natural gas in Poland was EUR 41.48/MWh, based on PLN-denominated prices converted into euros. This was EUR 2.13/MWh higher than \in 2024. A similar increase was recorded on the neighbouring THE market. The average spread between spot prices on POLPX and THE narrowed from EUR 4.76/MWh in 2024 to EUR 4.30/MWh in 2025. The spreads reflect the cost of cross-border gas transmission via interconnectors, as well as the regulatory burden associated with mandatory gas stockholding obligations imposed on importers.

Chart 6 Average monthly spot prices of natural gas in Poland and Germany in 2024–2025 [EUR/MWh]




Source: In-house analysis based on POLPX and EEX data.

According to POLPX data, in 2025 the total gas trading volume was 208.9 TWh, of which 175.6 TWh was traded on the futures market (RTT). This means that almost 84.1% of gas trades in 2025 were executed under contracts with maturities of a year, season (summer, winter), quarter, month, and week. Natural gas trading volumes in 2025 were up by 52.8% from 2024. In 2025, spot trading volumes reached 28.3 TWh in the day-ahead market and 4.9 TWh in the intraday market, an increase of 31.7% and 29.5%, respectively, from 2024. The trading volume on RTT grew by 57.7% year on year.

## Oil prices

In 2025, Brent crude opened the year at around USD 80–85 per barrel, and then gradually fell to about USD 70 in March and April. Prices rose sharply in June, briefly climbing above USD 80 per barrel, before easing again and stabilising in the USD 60–70 range. In the second half of the year, price movements remained volatile, but the overall trend was downward, with Brent moving towards approximately USD 62–65 per barrel at the end of December.

Chart 7 Brent crude prices (DTD) in 2025 [USD/bbl]




Source: In-house analysis based on Platts data.

## Electricity prices

Electricity prices in 2025 continued to be driven by movements in fuel and carbon markets, especially the prices of natural gas, hard coal and EU carbon allowances (EUAs). They were also influenced by conditions in the power system, including the generation mix within the merit order, that is the share of output from individual sources depending on their relative production costs and availability. More broadly, electricity prices also remained sensitive to general economic conditions and geopolitical factors.

### Natural gas

In the forward market, the weighted average price of the 2026 baseload gas contract (GAS_BASE_Y-26) stood at PLN 165.03/MWh in 2025. This was PLN 15.41/MWh, or 9%, below the level of the GAS_BASE_Y-25 contract quoted in 2024. By contrast, spot gas prices moved higher. The weighted average price on the RDNiBg market reached PLN 185.77/MWh in 2025, up 4% year on year, or PLN 7.61/MWh.

### Hard coal

Coal inventories at ARA ports remained below 2024 levels in 2025. However, this did not translate into upward price pressure. Lower cost competitiveness of coal reduced coal-fired generation volumes, but stable supply helped keep the market balanced. As a result, the average price of the annual API2 contract (continuous data) fell to USD 105.40 per tonne in 2025, down 8% year on year.

### EU carbon emission allowances (EUAs)

In the first half of 2025, EUA prices largely tracked broader market sentiment, which was shaped in part by geopolitical developments. From early April onwards, the market entered a clear upward trend, although prices stabilised during the summer months. For 2025 as a whole, the average price of the nearest-year December EUA contract (continuous data) stood at EUR 74.90/t, an increase of 13% year on year.

### Electricity forward market

For several years, pricing on Poland's wholesale electricity forward market has been driven primarily by EUA prices, hard coal prices, natural gas prices and the relationship between them (CDS/CSS). At the start of 2025, forward power prices in Poland came under downward pressure, reflecting broader conditions across the power system. From around PLN 470/MWh at the end of January, they fell to about PLN 400/MWh by the end of April. Thereafter, the market found support in steadily rising EUA prices. By year-end, the front-year contract traded at close to PLN 460/MWh. Against that backdrop, the weighted average price of the 2026 annual baseload contract (BASE_Y-26) came in at PLN 430.50/MWh in 2025, down PLN 19.30/MWh from the BASE_Y-25 contract quoted in 2024.

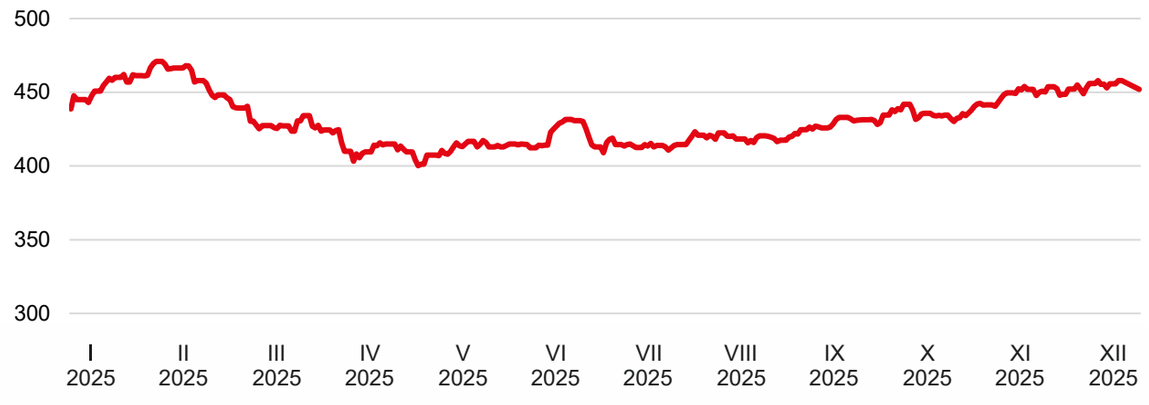
### Electricity spot market

The spot market was influenced by largely the same factors as the forward market, which meant that price trends in the two markets moved largely in parallel. Spot prices are also driven to a significant extent by weather conditions, given the sizeable and steadily growing share of renewable energy sources in the generation mix.

A notable market development came on 30 September 2025, when the Polish Power Exchange launched trading in 15-minute products within the European coupled day-ahead market, with the first delivery day on 1 October. In 2026, the exchange plans to extend 15-minute granularity to the local pricing session as well. The changes are intended to support more accurate planning of demand and generation by market participants. Legislative work also began in 2025 on restoring the obligation to sell a certain volume of electricity via the POLPX.

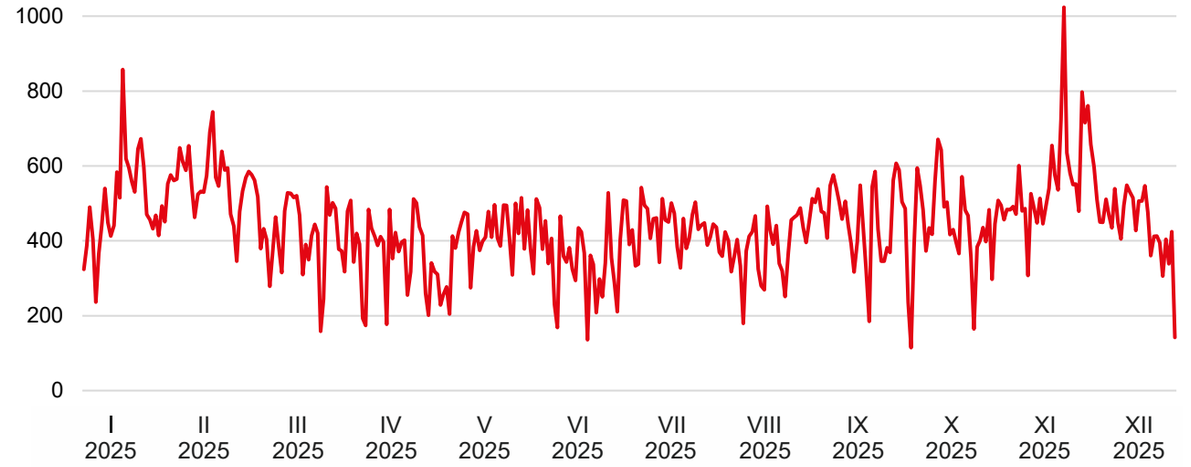
On the day-ahead market, 2025 brought a combination of lower volumes and higher prices compared with the previous year. The weighted average BASE price rose to PLN 446.30/MWh, up PLN 21.36/MWh, or 5%, year on year. At the same time, trading volumes fell by 4.8% year on year to 44.85 TWh.

Chart 8 BASE_Y-26 contract prices in 2025 [PLN/MWh]




Source: In-house analysis based on POLPX data.

Chart 9 TGeBase contract prices in 2025 [PLN/MWh]




Source: In-house analysis based on POLPX data.

## 3.3 Regulatory environment

The regulatory environment remains one of the most significant external factors shaping the ORLEN Group's operations. As a sector that plays a critical role in the economy and the climate transition, the fuel and energy industry is subject to a broad and increasingly complex regulatory framework covering areas such as emissions reduction, the development of low-carbon technologies, energy security, and the operation of fuel and energy markets.

At EU level, the most important changes include the revision of the 2040 climate targets, the reform of the EU ETS, and the postponement of the launch of the EU ETS2 system, as well as regulations relating to hydrogen, biomethane, sustainable aviation fuels (SAF), and methane emissions reduction in the energy sector. Other essential regulations are the rules governing the gas and hydrogen market, energy sanctions, and regulations phasing out imports of commodities from Russia and Belarus.

In Poland, major reforms are being introduced in areas including the hydrogen market, the emergency stocks system, the implementation of renewable energy targets and the National Indicative Target, energy efficiency, auction schemes for renewable energy and biomethane, as well as new support mechanisms for energy consumers. At the same time, work is under way on material draft legislation concerning the ETS, the energy market, grid connections, extended producer responsibility (EPR), and the deposit-return system.

These regulations have a direct bearing on the ORLEN Group's operations, particularly in the Refining, Petrochemicals, Energy, Gas and Retail segments, influencing investment priorities, operating costs and the pace of the energy transition.

## Regulatory environment in the EU

Table 3 List of key EU laws and regulations of relevance to the ORLEN Group

| Laws/Regulations | Description | Relevance to the ORLEN Group business segments | Status |
|---|---|---|---|
| Amendment to the European Climate Law and the proposed 2040 climate target; COM/2025/524 final | The EU and its Member States have committed to achieving climate neutrality by 2050. A first intermediate target has been set to reduce net greenhouse gas (GHG) emissions by at least 55% by 2030, and the European Commission has been tasked with developing a further intermediate target for 2040. Once the firm 2040 target has been adopted, work will begin on the energy and climate policy framework for the period beyond 2030.<br>The agreed solutions provide for:<br>• introducing a climate target to reduce net GHG emissions by 90% versus 1990 levels, with international carbon credits allowed for up to 5% of the EU's 1990 net emissions from 2036, following a pilot phase planned for 2031–2035;<br>• postponing the launch of the EU ETS2 from 2027 to 2028;<br>• reviewing the target every two years, with an option to revise it if needed;<br>• considering by the European Commission of a slower phase-out of free allocations from 2028 onwards and a review of the Market Stability Reserve;<br>• taking into account the following in implementing the target: energy availability and affordability, security of supply, energy security and energy efficiency.<br>The interinstitutional negotiations confirming the above were concluded on 10 December 2025, and the regulation was expected to be adopted in the first half of 2026. | High - Energy | Existing regulation |
| Directive (EU) 2023/2413 of the European Parliament and of the Council ("RED III") – revision of Directive (EU) 2018/2001 | The agreed solutions provide for:<br>• raising the 2030 target of a 14% minimum share of renewable energy in the transport sector and giving the Member States the option to meet the increased target by achieving: 1) a 29% share of renewable energy in the transport sector, or 2) a 14.5% reduction in greenhouse gas intensity (doubling the ambition of RED II);<br>• establishing a combined target for the share of advanced biofuels/biogas and renewable fuels of non-biological origin (RFNBOs) in the transport sector at 1% in 2025 and 5.5% in 2030, with a target minimum share of RFNBOs in 2030 at 1%;<br>• mandating that at least 42% of the hydrogen used in industry must come from RFNBOs by 2030, with this target increased to 60% by 2035.<br>The Directive is addressed to the Member States, which are required to transpose its regulations by 21 May 2025 (and for certain provisions, by way of an exception, by 1 July 2024).<br>RED III repeals the EU regulations formed the basis of the Polish National Reduction Target framework. | High | Existing regulation |
| Regulation (EU) 2023/2405 of the European Parliament and of the Council ("ReFuelEU Aviation") | The Regulation requires aviation fuel suppliers to gradually increase the share of sustainable aviation fuels (SAF) blended into the aviation fuels supplied at EU airports:<br>• the minimum required share of SAF at 2% will apply as of 2025 %, and will grow significantly (6% by 2030, 20% by 2035) to 70% by 2050;<br>synthetic fuels (e-JET) based on RFNBOs and low-carbon hydrogen will be promoted in particular through a dedicated sub-target, with their share increasing gradually (1.2% in 2030-2031, 5% by 2035, and 35% by 2050). | High – Downstream | Existing regulation |

| Laws/Regulations | Description | Relevance to the ORLEN Group business segments | Status |
|---|---|---|---|
| Regulation (EU) 2024/1787 of the European Parliament and of the Council of 13 June 2024 on the reduction of methane emissions in the energy sector | The Regulation imposes obligations on oil and gas sector companies to prevent methane emissions from infrastructure.<br>Requirements for production and transport companies will include in particular infrastructure monitoring, leak detection and repair, methane emissions reduction (e.g. ban on routine flaring and venting), and securing inactive wells.<br>Under the new regulations, importers will be obliged to obtain from their third-country suppliers information on the procedures they apply to reduce methane emissions. From 2027 onwards, import contracts may be entered into only with suppliers that apply methane emission monitoring measures equivalent to those required of EU operators. | High – Upstream and Supply | Existing regulation |
| Revision of the EU Emissions Trading System Directive | In 2025, the Directive was amended to postpone the implementation of the EU ETS2 from 2027 to 2028. | High – Downstream, Energy | Existing regulation |
| Commission Delegated Regulations (EU) 2023/1184 and 2023/1185 supplementing Directive (EU) 2018/2001 | Requirements to be met for hydrogen to be certified as an RFNBO:<br>• rules on when electricity used to produce hydrogen may be classified as 100% renewable;<br>• the life-cycle assessment (LCA) methodology for verifying whether an energy carrier (RFNBO/RCF) meets the required 70% GHG emissions reduction threshold (carbon intensity of no more than 28.2 g $CO_2$ eq/MJ).<br>At EU level, there are currently no certification schemes recognised by the European Commission that confirm compliance with the above requirements. | High | Existing regulation |
| Directive (EU) 2024/1788 of the European Parliament and of the Council of 13 June 2024 on common rules for the internal markets for renewable gas, natural gas and hydrogen, and Regulation (EU) 2024/1789 of the European Parliament and of the Council of 13 June 2024 on the internal markets for renewable gas, natural gas and hydrogen | The EU hydrogen and gas decarbonisation package is designed to support the development of the low-carbon and renewable gases sector. Its purpose is to create a new internal market for hydrogen while, in parallel, gradually transforming the natural gas market by promoting the blending of renewable and low-carbon gases into pipeline gas.<br>In principle, the Regulation has applied directly since 5 February 2025. The Directive must be transposed into Polish law by 5 August 2026.<br>The package includes regulations on:<br>• a general framework defining low-carbon gases, with further detail to be set out in a delegated act;<br>• rules governing the functioning of infrastructure operators (transmission, distribution, storage and terminals) in the new hydrogen market;<br>• measures to promote injecting low- and zero-carbon gases (e.g. hydrogen, biomethane) into gas networks by offering network tariff discounts;<br>• the option for Member States to restrict supplies of natural gas, including liquefied natural gas (LNG), from Russia or Belarus;<br>• the possibility of applying, without time limit, discounts of up to 100% on entry transmission tariffs for gas entering the transmission network from LNG terminals;<br>continued operation of the voluntary gas demand aggregation mechanism. | High | Existing regulation |
| Communication from the Commission amending the Guidelines on certain State aid measures in the context of the greenhouse gas emission allowance trading system post-2021 | The list of sectors eligible for compensation for indirect EU ETS costs has been extended to include:<br>• production of other inorganic basic chemicals (NACE 20.14),<br>• manufacture of fertilisers and nitrogen compounds (NACE 20.15),<br>• manufacture of plastics in primary form (NACE 20.16).<br>Member States were given the discretion to choose to compensate the newly eligible sectors for indirect emission costs incurred in 2025.<br>The maximum aid intensity was raised from 75% to 80% for the sectors previously deemed to be exposed to a genuine risk of carbon leakage due to indirect emission costs. For the newly added sectors, the rate was set at 75%. | High | Existing regulation |
| Regulation on phasing out Russian natural gas imports and preparing the | The Regulation was adopted by the European Parliament on 17 December 2025, with formal adoption by the Council expected in January 2026. | High | Existing regulation |

| Laws/Regulations | Description | Relevance to the ORLEN Group business segments | Status |
|---|---|---|---|
| phase-out of Russian oil imports, improving monitoring of potential energy dependencies and amending Regulation (EU) 2017/1938 | The Regulation provides for:<br>• a prohibition on imports of LNG and pipeline gas from Russia, entering into force six weeks after the effective date of the Regulation (i.e. expected to start applying in the first quarter of 2026), subject to transitional periods for existing contracts;<br>• a prior authorisation procedure for gas imports to ensure that the ban on Russian gas imports is enforced in practice;<br>• penalties for failure to comply with the ban;<br>an option to temporarily suspend the application of the Regulation in the event of sudden and significant developments which seriously threaten the security of energy supply of one or more Member States. However, the suspension is permitted only in cases where an emergency is declared by a Member State, applies only for a limited period (up to four weeks) and only to short-term supply contracts. | | |
| Amendments to the following, adopted in 2025:<br>• Council Regulation (EU) No 833/2014 of 31 July 2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, or<br>Council Regulation (EC) No 765/2006 of 18 May 2006 concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine, that is, the so-called 16th, 17th, 18th and 19th sanctions packages. | In 2025, the European Union adopted four new sanction packages targeting the Russian Federation and the Republic of Belarus, commonly referred to as the 16th, 17th, 18th and 19th sanctions packages.<br>The following had the greatest impact on the energy sector:<br>• the expiry of derogations allowing certain EU Member States to continue importing Russian crude oil or petroleum products;<br>• lowering of the oil price cap for Russian crude, together with a mechanism for its periodic review and adjustment;<br>• the introduction of a ban on imports of petroleum products falling under CN code 2710 where imported from third countries and produced from Russian crude oil;<br>• the introduction of a ban on imports of liquefied natural gas (LNG) from Russia, to take effect in stages in 2026 and 2027;<br>• the expansion of measures targeting shadow fleet vessels, involved in transporting Russian crude oil or petroleum products;<br>• the expansion of sanctions targeting individuals and entities from the Russian energy sector.<br>The energy sector is also affected by sanctions imposed under other jurisdictions, including those of the United States and the United Kingdom. | High – Downstream | New regulation |
| Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs<br>OJ L 139, 30.04.2004, p. 1–54 (ES, DA, DE, EL, EN, FR, IT, NL, PT, FI, SV) | The principal objective of the hygiene rules is to ensure a high level of consumer protection with regard to food safety. All individuals working in the food sector are required to ensure that food is handled in a safe and hygienic manner, so that no food-borne hazards occur at any stage of the production process. This can be achieved by applying good hygiene practices and procedures based on the principles of Hazard Analysis and Critical Control Points (HACCP). | High – Consumers and Products | Existing regulation |

## Regulatory environment in Poland

### Table 4 List of key Polish laws and regulations of relevance to the ORLEN Group

| Laws/Regulations | Description | Relevance to the ORLEN Group business segments | Status |
|---|---|---|---|
| Act Amending the Act on Biocomponents and Liquid Biofuels and Certain Other Acts of 21 February 2025 | The Act implements into Polish law the RED II provisions on the use of low-carbon fuels and electricity in transport.<br>The Act of 21 February 2025 provides for a gradual increase in the National Indicative Target, from 9.2% in 2025, to 10% in 2026–2029, and then to 14.9% in 2030. | High – Downstream | Amendment to existing regulations |
| Act Amending the Energy Law and Certain Other Acts of 21 November 2024 | The Act entered into force on 20 January 2025. It establishes a regulatory framework for the operation of the hydrogen market in Poland by: introducing a set of definitions into energy law, creating a framework enabling cross-sectoral activities involving natural gas and hydrogen, establishing a framework for certification and designation of hydrogen network operators, defining the regulatory framework for licensing hydrogen trading and storage activities, and laying down rules for the operation of hydrogen networks. | High – Downstream, Upstream & Supply | Existing regulation |
| Act Amending the Act on Reserves of Crude Oil, Petroleum Products, and Natural Gas and on Measures to Address Threats to the State's Fuel Security and Disruptions in the Oil Market, and the Energy Law of 12 September 2025 | The Act introduces major changes to Poland's emergency stocks system, which governs the creation, maintenance and financing of stocks of crude oil, petroleum products and natural gas in Poland.<br>The share of agency-held stocks maintained by the Government Strategic Reserves Agency (RARS) is to increase, while the mandatory stock maintenance obligations for businesses will be reduced. The stocks will be transferred to the President of RARS in accordance with an established timetable. The reduction in emergency stock volumes required to be maintained by businesses and the increase in RARS stocks will be a phased process implemented over the three-year period from 2025 to 2027.<br>In relation to gaseous fuels, the Act allows RARS to continue providing the ticketing service in the 2025/2026 gas year. | High – Downstream, Upstream and Supply | Amendment to existing regulations |
| Draft Act Amending the Act on Trading in Greenhouse Gas Emissions Allowances and Certain Other Acts (ETS1) (UC39) | The draft provides for the gradual phase-out of free allowance allocations for aircraft operators and the transition to full auctioning from 2026, tightens the rules governing free allocations for stationary installations by introducing mechanisms designed to encourage green investment, and extends the EU ETS to maritime transport, installations that did not previously meet the inclusion criteria because they used biomass boilers, as well as installations previously classified as installations using exclusively biomass.<br>The draft assumes that the Modernisation Fund allocation for Poland will be increased by an additional pool equivalent to 2.5% of the total number of EU allowances, of which 34.2% has been earmarked for Poland. The funding would be used to modernise the energy system and improve energy efficiency. At least 90% of the new pool must be spent on priority areas, such as renewable energy sources, energy storage and transmission networks. Under the new rules, 100% of the proceeds from the sale of allowances, or their financial equivalent, must be used for climate protection and the energy transition. The proposed new regulations expand the powers relating to emissions monitoring and enforcement for the National Centre for Emissions Balancing and Management (KOBiZE), the Chief Inspectorate of Environmental Protection (GIOŚ), the Provincial Inspectorate of Environmental Protection (WIOŚ) and directors of maritime offices. | High – Downstream, Energy | Draft amendments to existing regulations |
| Draft Act Amending the Energy Efficiency Act and Certain Other Acts (UC77) | The draft legislation introduces a requirement to apply the Energy Efficiency First (EE1st) principle when planning major energy investments, that is projects exceeding EUR 100 million or, in the case of transport infrastructure, EUR 175 million.<br>It raises the national target for final energy consumption savings (the cumulative amount of total final energy savings) in 2021–2030 from 30,714 ktoe to 44,465 ktoe, while keeping the current target for obligated parties under the white certificate scheme unchanged, with most of the additional savings to be delivered through alternative measures. Public institutions are given a specific target to reduce total final energy consumption by 1.9% annually versus 2021 levels (with the requirement applying to cities with more than 50,000 inhabitants from 1 January 2027 and to rural areas from 1 January 2030).<br>The draft also introduces direct incentives for projects carried out under the ESCO (Energy Service Company) model as part of the white certificate scheme, including a lower threshold for average annual energy savings required to qualify for an energy efficiency certificate and streamlined verification rules. It retains the alternative compliance fee mechanism, while introducing operational improvements intended to avoid financial penalties. | High – Downstream, Energy, Upstream & Supply | Draft amendments to existing regulations |

| Laws/Regulations | Description | Relevance to the ORLEN Group business segments | Status |
|---|---|---|---|
| | The proposed amendment also changes the thresholds and obligations applicable to businesses, providing for a requirement to implement and certify an energy management system where average annual final energy consumption exceeded 23.611 GWh over the preceding three years, and a mandatory energy audit every four years where annual energy consumption reaches 2.78 GWh. | | |
| Draft Act Amending the Energy Law and Certain Other Acts (UC84) | The proposed legislation provides for a major reform of the Energy Law designed to address the shortage of available grid connection capacity and remove one of the main barriers to the energy transition. At the heart of the reform is a change to the rules for connecting installations to the electricity grid.<br>The main elements of the draft regulations include:<br>• the right to a fixed-term contract with a guaranteed fixed price for at least one year;<br>• the option to have multiple energy offtake points (consumption metering points) served by a single service line, subject to a capacity limit;<br>• flexible and configurable grid connection agreements under which available connection capacity may be capped or curtailed in certain circumstances;<br>• the possibility for PSE to allocate grid connection capacity for renewable energy sources or storage facilities through competitive procedures in 2026–2028;<br>• streamlining of the grid connection process and more efficient use of infrastructure;<br>• changes relating to REMIT and network development planning.<br>The Act will also allow electricity to be sold, stored and used for the provision of system services during the commissioning phase. | High – Energy | Draft amendments to existing regulations |
| Draft Act Amending the Energy Law, the Renewable Energy Sources Act (UD284), and Certain Other Acts with a View to Deregulating the Energy Sector (UDER92) | The draft regulation reinstates an obligation for electricity producers to sell 80% of their electricity output through the Polish Power Exchange or platforms operated by nominated electricity market operators (NEMOs).<br>Exemptions would apply to electricity supplied to a final consumer via a direct line; electricity generated in a renewable energy source with a total capacity of less than 10 MW or in another generating unit with a total capacity of less than 50 MW; electricity generated in high-efficiency cogeneration units with an average annual conversion efficiency above 52.5%, connected directly either to the equipment or installations of the final consumer of that electricity or to a distribution network operated by that final consumer; electricity consumed by the producer for its own needs; electricity generated and supplied under a renewable electricity sale agreement concluded with a final consumer and entered in the ERO register; and electricity required for transmission or distribution system operators to perform their statutory duties.<br>Those exemptions would not apply to electricity purchased and sold between electricity market participants within a single group of companies. Electricity sale agreements concluded before the entry into force of the Act would continue in effect.<br>The draft also increases the volume of high-methane natural gas required to be sold through a commodity exchange or on a market organised by an entity operating a regulated market in Poland from the current 55% to 85%. | High – Energy, Upstream & Supply | Draft amendments to existing regulations |
| Draft Act Amending the Renewable Energy Sources Act and Certain Other Acts (UD332) | The draft act includes amendments to the Wind Farm Projects Act, changing the required distance between onshore wind farms and extra-high-voltage lines, and allowing the planning and environmental procedures to run in parallel.<br>It also changes the rules on virtual prosumers by requiring at least 10% of the installed capacity of an onshore wind farm to be made available to residents of the municipality where the project is located and of a neighbouring municipality, in return for an agreed fee.<br>The new regulations further introduce an auction-based support scheme for biomethane installations with a capacity above 1 MW, based on a pay-as-bid model, change reference price under the feed-in premium support scheme, which applies to existing installations with a capacity of up to 1 MW, and streamline the support system for modernised hydropower plants.<br>Other proposed changes include allowing electricity generated and sold during periods of negative prices to be eligible for settlement under the renewable energy auction support scheme, and changing the auction system for biogas- and biomass-fired sources by lowering the minimum electricity delivery threshold in the bid to 65%, from the current 85%.<br>The proposed act broadens the definition of a renewable energy source to include not only electricity storage, but also heat storage and cooling storage.<br>Lastly, it introduces a new method for the settlement of the negative balance (the amount of support payable when the market price obtained by the energy producer is below the auction reference price) for solar PV farms that have won renewable energy auctions and feed electricity volumes into the grid at no more than 50% of their installed capacity, which would apply for a period of 12 months. | High – Energy | Draft amendments to existing regulations |

| Laws/Regulations | Description | Relevance to the ORLEN Group business segments | Status |
|---|---|---|---|
| Act Amending Certain Acts to Improve Support Mechanisms for Electricity and Heat Consumers of 18 December 2025 | The Act extends until 30 June 2026 the deadline for micro, small and medium-sized enterprises (SMEs) to provide electricity sellers with information on the amount of aid they were granted in connection with the application of the maximum electricity price in the second half of 2024 (under the Act on Extraordinary Measures to Limit Electricity Prices and Support Certain Consumers in 2023–2025 of 27 October 2022).<br>It also streamlines the process of handling Home Heating Bills Discount Scheme applications from eligible household consumers. | High – Energy | New regulation |
| Act on the Home Heating Bills Discount Scheme and on Amendments to Certain Other Acts to Limit Electricity Prices of 12 September 2025. | The Act introduces a Home Heating Bills Discount Scheme for households with incomes meeting the statutory thresholds for single-person and multi-person households that use district heating and incur heat costs of more than PLN 170/GJ, net.<br>It also freezes electricity prices for households at PLN 500/MWh in the final quarter of 2025. | High – Energy | New regulation |
| Draft Act on Packaging and Packaging Waste (UC100) | The draft act is designed to implement a new model of Extended Producer Responsibility (EPR) into Polish law and introduce changes relating to single-use plastic (SUP) products and the deposit-return system.<br>As regards the EPR system:<br>• the existing definitions of ‘entity introducing packaged products into the market’ and ‘entity introducing packaging into the market’ would be replaced with a new definition of ‘producer’; as part of producers’ financial responsibility, a packaging fee would be introduced, payable by the producer for each kilogram of packaging (including packaging of a packaged product) that the producer first makes available in the territory of a Member State or unpacks without being the end user;<br>• the funds generated under the EPR system would be managed by the National Fund for Environmental Protection and Water Management (NFOŚiGW) acting as the producer responsibility organisation (PRO); these funds would include the proceeds from packaging fees, to be transferred quarterly by the province marshals; from 2028, producers paying the packaging fee (currently: entities introducing packaged products into the market) would no longer be required to meet specified recycling targets, and the packaging product fee would be abolished;<br>• a two-year transitional period would be introduced, after which the EPR system for packaging would be fully implemented.<br>As regards the SUP fee, the deadline for transferring the fee to the province marshals’ bank accounts would change from annual to quarterly, in line with the approach already used for the recycling fee.<br>The proposed regulations also clarify that food service establishments are required to collect the fee, and introduce a new requirement that records must be kept for all types of shopping bags. | High – Consumers and Products | New regulation |


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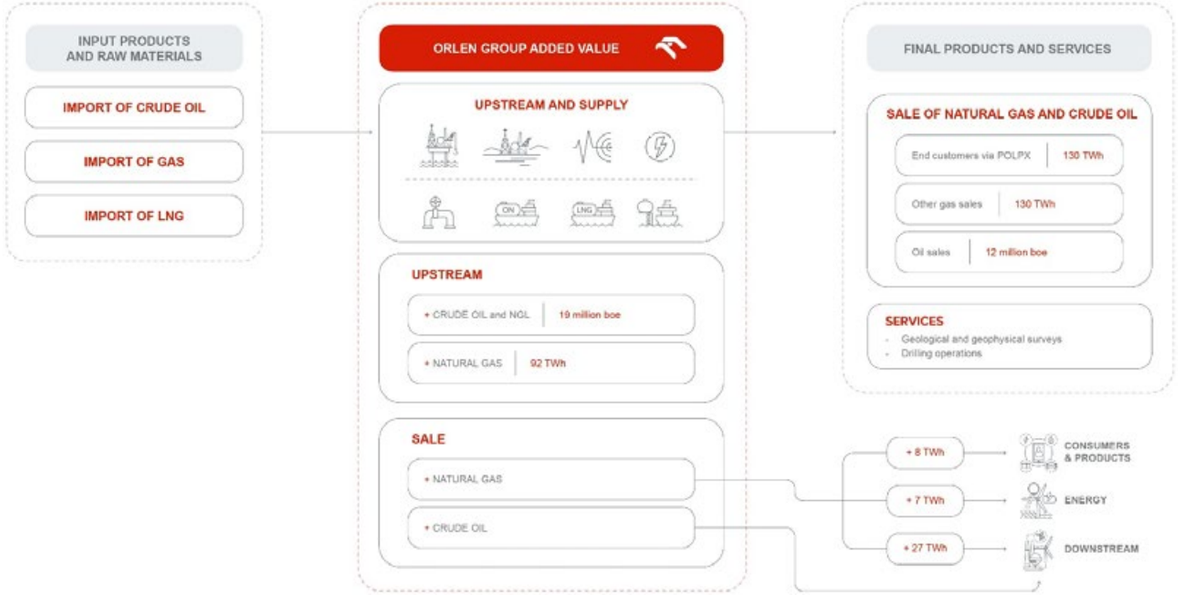
# 4. Operating segments

## 4.1 Upstream and Supply

We are active in natural gas and crude oil production in Poland, Norway, Pakistan, Canada and Lithuania. In 2025, our production volume totalled 74 million boe. In addition to extracting hydrocarbons and preparing products for sale, ORLEN Group companies specialise in oil and gas exploration and development of new fields, as well as in geological analyses, geophysical surveys and drilling operations.

We are the largest supplier of natural gas in Poland, with wholesale sales reaching most of the key sectors of the Polish economy. Our gas sales business is also being actively expanded abroad, including in Germany, Lithuania and the Baltic states. We source oil and gas from own production and imports. The ORLEN Group is Poland's largest importer of crude oil.

Figure 3 ORLEN Group business model by segment

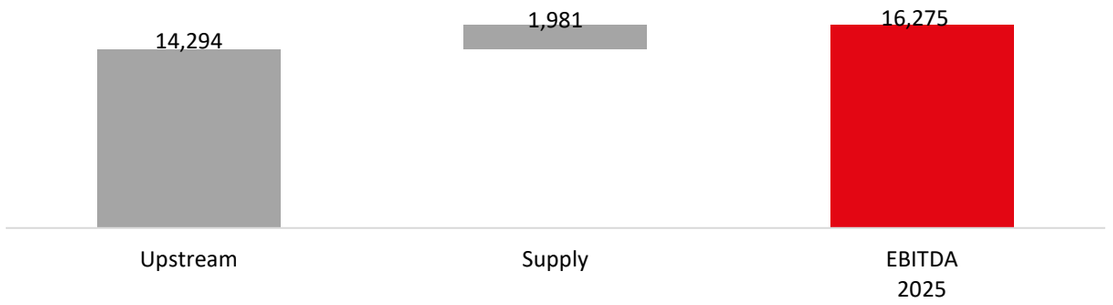



## Financial results

Table 5 Financial highlights of the Upstream & Supply segment

| [PLN million] | 2025 | 2024 | change |
|---|---|---|---|
| Segment revenue, including: | 144,428 | 169,262 | (24,834) |
| Revenue from external customers | 53,802 | 59,179 | (5,377) |
| Inter-segment revenue | 90,626 | 110,083 | (19,457) |
| Segment costs | (133,686) | (158,752) | 25,066 |
| Other operating income | 3,774 | 5,369 | (1,595) |
| Net other operating income/(expenses) | (5,825) | (3,428) | (2,397) |
| (Impairment loss)/ reversal of impairment loss on trade and other receivables | (54) | (105) | 51 |
| **LIFO-based EBITDA excluding impairment losses** | **16,275** | **18,493** | **(2,218)** |
| LIFO-based EBITDA | 14,188 | 18,336 | (4,148) |
| EBITDA | 13,920 | 18,101 | (4,181) |
| Operating profit (EBIT) | 8,637 | 12,346 | (3,709) |
| Capex | 8,654 | 7,646 | 1,008 |

Chart 10 LIFO-based EBITDA by business line [PLN billion]



Upstream PLN 14.3 billion [up PLN 13.6 billion year on year]
(+) higher prices of gas
(-) decline in oil prices
(-) narrower TTF–Henry Hub spread
(-) appreciation of the PLN against the NOK

Supply PLN 2.0 billion [down PLN 15.8 billion year on year]
(+) higher wholesale gas sales volumes
(-) lower realised gas selling price
(-) negative effect of the 2024 PPA settlement

## Upstream operations

Figure 4 ORLEN Group's 2025 oil and gas production volumes by country [thousand boe]

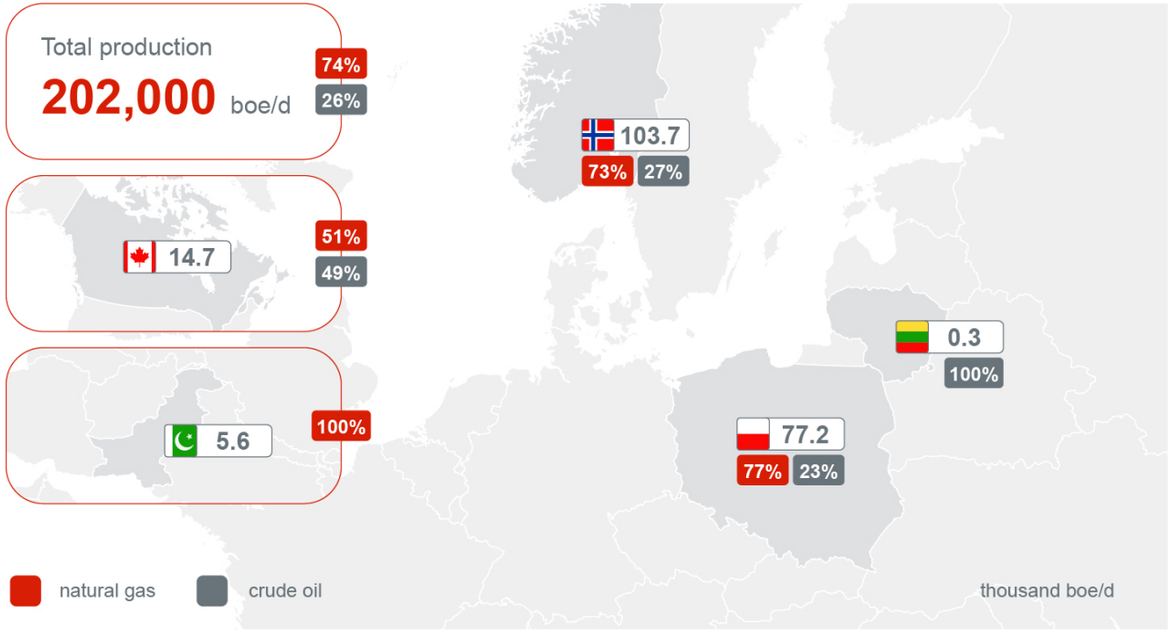


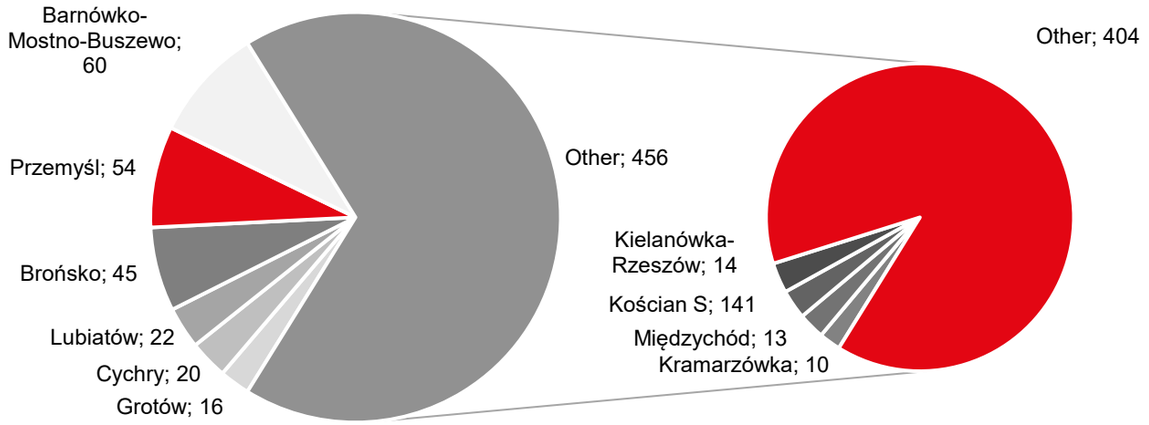

Table 6 ORLEN Group's reserves by country (as at 31 December 2025) [million boe]

| | Crude oil, condensate, NGL | Natural gas |
|---|---|---|
| | **322.7** | **921.7** |
| Poland | 121.7 | 552.0 |
| Norway | 118.0 | 271.2 |
| Canada | 82.1 | 60.2 |
| Pakistan | 0.0 | 38.3 |
| Lithuania | 0.8 | 0.0 |

In 2025, the ORLEN Group's reserves-to-production (R/P) ratio was 16.9.

Poland

Chart 11 Hydrocarbon reserves in Poland by field at year-end 2025 [million boe]




In 2025, we continued crude oil and natural gas exploration and appraisal projects in the Carpathian Mountains, Carpathian Foothills, Przedsudecka Monocline, Polish Lowlands, and the Kraków, Gdańsk and Poznań Oil Provinces. As at 31 December 2025, we held 41 licences: 34 combined (exploration, appraisal, and production) licences and 7 exploration and appraisal licences for crude oil and natural gas.

Within the Płotki licence area in the Province of Poznań, work is ongoing on the Siedlemin field, discovered under a joint project of ORLEN S.A. and ORLEN Upstream Polska. In February, the field's reserves were confirmed. Following production tests, they were estimated at over 1.2 million boe of natural gas. The swift commencement of production from this new find will be facilitated by the extensive extraction infrastructure in the region.

In April, gas production was launched from the Grodzewo field in the Province of Poznań as part of a joint project of ORLEN and ORLEN Upstream Polska. The field is expected to remain in production for around 18 years, and its total reserves are estimated at approximately 1.3 mcm.

In August, following the drilling of another well at the Trzebusz field in the Province of Szczecin, the recoverable natural gas reserves increased by 2.4 million boe. Once brought on stream, the field will contribute up to 0.1 million boe of gas annually. Total natural gas reserves in the area rose to 7.7 million boe.

In December, we started production from the Różańsko field in the Province of Szczecin, with gas reserves estimated at 6.2 million boe. The project is linked to the expansion of the Dębno oil and gas production site, which will also make it possible to increase output from other producing fields. With the Różańsko project, our domestic natural gas production will rise by approximately 0.7 million boe annually.

Under the Edge project, wells at the Tuchola natural gas field were decommissioned between October and December. In addition, production from five other fields was discontinued in 2025.

We reached final depth in 18 out of the 20 wells drilled in 2025, with a total drilled length of 43.266 km. These included 5 exploration wells, 6 appraisal wells, and 7 production wells. Formation test results were obtained from 18 wells, of which 11 were positive.

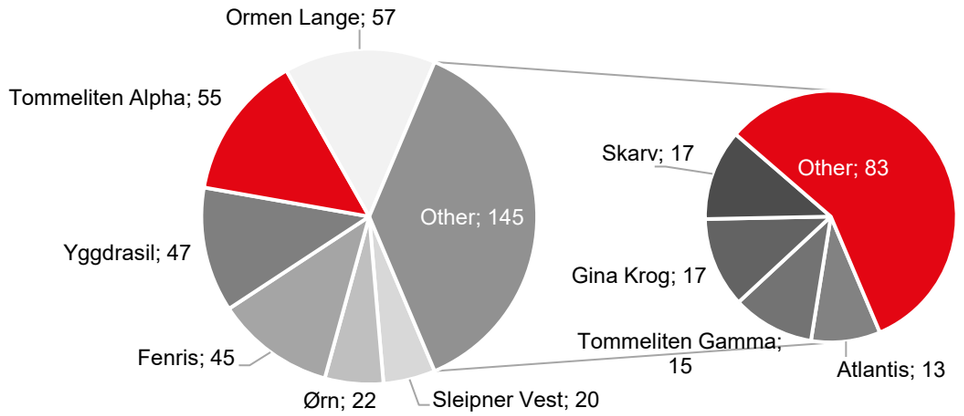
Table 7 Number of oil and gas production sites

| | Sanok | Zielona Góra |
|---|---|---|
| Gas production sites | 18 | 8 |
| Oil production sites | 5 | 1 |
| Oil and gas production sites | 11 | 7 |
| **Total** | **34** | **16** |

## Norway

We operate on the Norwegian Continental Shelf through ORLEN Upstream Norway (“ORLEN UN”, “OUN”). As at the end of 2025, OUN held interests in 94 licences, including 5 licences where it is the operator. Following the annual licensing round (APA 2025) in early 2026, OUN was offered interests in 6 new licences.

Chart 12 ORLEN Upstream Norway's asset portfolio* at year-end 2025 [mm boe]




* 2P+2C

In May 2025, OUN discovered the E-prospect field in the Skarv area, with reserves estimated at 3–7 million barrels of oil equivalent. During drilling, an additional smaller accumulation containing up to 2 million boe was found. We hold an 11.9% interest in the licence. Its area is adjacent to the Skarv field, which is expected to significantly facilitate future development of the new reserves.

In June, OUN and its licence partners decided to proceed with the development of the Øst Frigg field. Production from the site continued since the 1980s, but was suspended in the late 1990s once the resources had been depleted. A well drilled in May 2023 resulted in the discovery of oil reserves estimated at 51–103 million boe. These will be brought on stream as part of the Yggdrasil area, which is currently under development, improving the project’s economics and extending the area’s production life. Also in June 2025, OUN completed Phase 3 of the development of Ormen Lange, in which it holds a 14% interest. The project is expected to increase production volumes by a further 4–7 bcm.

In August 2025, OUN and its licence partners announced the discovery of the Omega Alpha oil field, with reserves estimated at 96–134 million boe, of which 10.5–15 million boe is attributable to the ORLEN Group. Omega Alpha may be brought on stream as part of development work in the Yggdrasil area.

In September 2025, ORLEN UN started production from the Andvare discovery in the Norwegian Sea, formally part of the Alve field, which will provide us with 1.9 million boe of natural gas.

In October 2025, OUN announced an agreement with TotalEnergies EP Norge to acquire all interests in the Tommeliten Gamma field in the Ekofisk area. As a result, we expanded our interest in the field from 42.4% to 62.6% and our reserves, mainly natural gas, rose by approximately 5 million boe.

In December 2025, OUN finalised a transaction with DNO to acquire 7.6% interests in the Albuskjell and Vest Ekofisk fields, increasing the Group's reserves by more than 7 million boe. In the past, production from these fields was halted in the 1990s following the redevelopment of infrastructure in the Ekofisk area. Now, the licence partners have decided to resume operations on three fields using new technologies designed to improve efficiency and reduce operating costs. Production under the Previously Produced Fields project is scheduled to begin in the fourth quarter of 2028.

OUN also agreed to sell a 20% interest in exploration licence PL1135 and a 0.83% interest in the Verdande field to DNO. Verdande's reserves attributable to OUN amounted to 0.35 million boe and consisted predominantly of crude oil.

At the end of 2025, OUN produced hydrocarbons from 20 fields in total, and continued development projects on a further 6, with production scheduled to commence in 2026–2027.

Five exploration and appraisal wells were drilled in 2025, resulting in the discovery of an estimated 99–141 million boe of hydrocarbons, with OUN's share ranging from 11.0 to 16.09 million boe. The total drilled length was 69.1 km for exploration and appraisal wells, and 126.1 km for production wells.

Following the acquisition from TotalEnergies and DNO of interests in three gas fields: Albuskjell, Tommeliten Gamma and Vest Ekofisk, OUN's hydrocarbon reserves increased by a further 12 million boe. At the end of 2025, they totalled 389.2 million boe, with natural gas accounting for nearly 70% of the volume (270.5 million boe)

### Canada

We conduct exploration and production activities in Alberta, with all output from the Canadian fields sold on the local market. Our key production assets are in the Kakwa area (Montney formation) and the Ferrier and Lochend areas (Cardium formation), and include primarily unconventional tight oil and tight gas projects using horizontal production wells and the multi-stage hydraulic fracturing technology. These areas gave been well appraised and carry low geological risk.

In 2025, ORLEN Upstream Canada maintained the steady pace of development seen in previous years across its key assets in northern and southern Alberta. During the year, drilling began on a total of 13 wells: 3 in the Kakwa area, including 1 water disposal well (the project is expected to deliver savings in the region of CAD 6–8 million annually, driving profits and margins), 8 wells in the Ferrier area, and 2 in the Lochend area.

In total, 14 wells were completed and brought on stream in 2025.

### Pakistan

Our exploration and production activities in Pakistan are conducted under a hydrocarbon exploration and production agreement for the Kirthar licence area. In 2025, our production operations at the Rehman, Rizq, and Rayyan fields relied on a total of 13 wells. As part of the development of the Rehman and Rizq fields, drilling continued on the Rizq-6 production well, while preparations began for the Rehman-9 production well. We also commenced testing of the Rafat-1 exploration well with to document additional reserves. In total, approximately 3.4 km was drilled in the Rizq-6 well in 2025.

With a view to expanding our exploration activities, we acquired a 59% interest, together with operatorship, in the highly promising Baran licence, valid for three years from December 2023. Seismic surveys carried out in 2025 produced approximately 390 km of 2D seismic lines, and we started acquisition of 687 $km^2$ of 3D seismic data. The acquisition campaign will continue until mid-2026. In addition, we hold a 25% interest in the Musakhel exploration licence, where the first well is expected to be drilled in late 2026.

### Gas storage facilities

We currently own and operate seven underground storage sites for high-methane gas:

- five depleted-field storage facilities: Wierzchowice UGSF, Strachocina UGSF, Husów UGSF, Swarzów UGSF and Brzeźnica UGSF (in depleted oil and gas fields),
- two cavern gas storage facilities – Kosakowo UGSF and Mogilno UGSF (in depleted salt caverns),

with a combined capacity of approximately 3.3 bcm.

Their primary purpose is to balance seasonal fluctuations in demand by enabling gas to be injected in summer and withdrawn during periods of higher consumption. Depleted-field storage provides stable, long-term support for the transmission system, while cavern storage facilitates a very rapid response to short-term changes in demand. The storage system plays a key role in safeguarding Poland's energy security and ensuring flexible balancing of gas supplies.

Our Upstream operations are complemented by two nitrogen-rich gas storage facilities: Daszewo UGSF and Bonikowo UGSF, with a combined working capacity of 250 mcm.

Their main role is to support the operation of the nitrogen-rich gas system and store gas from nitrogen-rich gas production facilities.

### Other operations in Poland and abroad

In March 2025, ORLEN and Equinor signed an agreement to cooperate in a number of areas, including carbon dioxide transport and storage in Poland. The carbon storage project would help curb $CO_2$ emissions into the atmosphere, supporting industrial decarbonisation. The parties will identify potential $CO_2$ storage locations in Poland and in the Polish part of the Baltic Sea. The next step will be to analyse the feasibility of joint projects based on the selected prospective storage sites in Poland.

We provide drilling and oilfield services, along with innovative geophysical, geotechnical, geological and hydrogeological solutions for geological structure exploration. Our services support the broadly defined multi-energy sector, in particular oil and natural gas exploration, renewable energy projects (including geothermal and offshore wind), offshore and onshore infrastructure, nuclear energy, and underground storage facilities, both in Poland and internationally.

## Supply operations

### Wholesale operations in the gas market

Table 8 Structure of gas sales to customers outside the ORLEN Group [TWh]

| | 2025 | 2024 |
|---|---|---|
| **Poland, including:** | **203.2** | **169.9** |
| Polish Power Exchange (POLPX) | 130.3 | 103.9 |
| **Foreign countries** | **57.5** | **37.1** |

We specialise in the wholesale distribution of natural gas produced from fields in Poland and imported via pipelines and by sea. Our natural gas and LNG trading activities are conducted through dedicated departments. ORLEN also supplies natural gas for its own production needs and to other ORLEN Group companies.

We holds licences for trading in gaseous fuels, trading in natural gas abroad, liquefaction of natural gas and regasification of liquefied natural gas, as well as gas storage.

#### Imports

In 2025, we purchased natural gas mainly under the long-term contracts and agreements specified below:

- gas sale contracts with Equinor ASA Group companies, with deliveries contracted for the period from 1 January 2023 to 1 January 2033;
- liquefied natural gas sale contract with QatarEnergy LNG N(3), effective until mid-2034;
- liquefied natural gas sale contract with Cheniere Marketing International LLP, effective until 2042;
- liquefied natural gas sale contract with Venture Global Calcasieu Pass, effective until 2042.

To transport LNG contracted on a FOB basis, ORLEN LNG Trading Limited charters LNG carriers. In 2025, the fleet was expanded to include two new vessels: *Józef Piłsudski* and *Ignacy Paderewski,* each with a capacity of approximately 174,000 cubic metres. Each of them can carry a cargo of about 70,000 tonnes of LNG, equivalent to about 1.1 TWh of regasified natural gas.

Table 9 Number of LNG deliveries in 2025 by contract

| CONTRACTS | Venture Global | Qatargas I | Qatargas II | PST (spot) | Cheniere | Total |
|---|---|---|---|---|---|---|
| Q1 | 0 | 3 | 1 | 12 | 4 | **20** |
| Q2 | 3 (including 1 delivery to Lithuania) | 1 | 2 | 9 | 6 | **21** (Świnoujście 20, Kłajpeda 1) |
| Q3 | 6 | 3 | 2 | 4 | 5 | **20** |
| Q4 | 4 | 4 | 1 | 7 | 5 | **21** |

In 2025, our import capabilities were expanded with the completion the Świnoujście LNG terminal upgrade. The terminal's maximum regasification capacity exceeded 90 TWh.

Overall, we received 81 LNG deliveries at the Świnoujście terminal in 2025, with a total volume of 5.99 million tonnes, equivalent to about 91.6 TWh. This marked a significant increase compared with 2024, when imports through the terminal totalled 70.2 TWh.
Natural gas from fields on the Norwegian Continental Shelf, sourced from our own production and under contracts with other producers, is transmitted via the Baltic Pipe. Supplies to the Polish market are secured through long-term capacity bookings, complemented by short-term bookings made against available surplus capacity. The structure of our gas supply portfolio and transmission capacity bookings makes it possible to adjust deliveries to changes in demand, for example during periods of higher consumption. We have booked transmission capacity on the Baltic Pipe until 2037. We also have access to Danish underground gas storage facilities, which help stabilise supplies during maintenance shutdowns or other disruptions along the transmission route.

#### Wholesale gas sales in Poland

In 2025, we continued supplying natural gas to Poland's largest industrial customers across key sectors. Our strategic customers include Grupa Azoty S.A. and its subsidiaries, the PGE Group, the ArcelorMittal Group, and KGHM Polska Miedź.

Beyond these major contracts, we entered into numerous gas supply contracts with both existing and new customers. Gas is sold at market prices, and the pricing formulas under the contracts allow

customers to develop their own price hedging strategies. The formulas follow a standardised and objective methodology.

In 2025, our high-methane grid gas sales reached 198.6 TWh, a 16% increase from 171.2 TWh in 2025.

In 2025, we also supplied approximately 8.2 GWh of natural gas at the Polish-Lithuanian border.

In 2025, the volume of our gas sales on POLPX (calculated after the delivery date in 2025) was approximately 130.3 TWh, up by some 26.4 TWh year on year.

We continued to develop our small-scale LNG business in 2025, delivering liquefied natural gas via cryogenic tanker trucks to regasification facilities and stations without access to the national gas transmission or distribution network. With 11 tanker trucks filled at the LNG terminal in Świnoujście in 2025, we nearly matched the 2024 figure. The aggregate amount of LNG we placed on the market was 212 thousand tonnes, of which 192 thousand tonnes was sourced through Świnoujście and 20 thousand tonnes came from facilities in Odolanów and Grodzisk Wielkopolski.

Ticketing service

In 2025, we contracted the Government Strategic Reserves Agency (RARS) to maintain part of our mandatory natural gas reserves.

In September 2025, an annex was signed to extend the contract for the following year.

Furthermore, we took part in the RARS ticketing service application process, and in September 2025 we signed a contract securing maintenance of mandatory gas reserves for the period from 1 October 2025 to 30 September 2026.

**Wholesale gas sales abroad**

Through the ORLEN Energy Trading Group (the “OET Group”), we have been expanding our presence in Europe in three key areas: global LNG trading, access to the European gas market, and wholesale activities on the markets of Central and Eastern Europe. In 2025, the OET Group sold 147.4 TWh of pipeline gas (including 50.1 TWh sourced from ORLEN Upstream Norway), 60.2 TWh of LNG (including sales under the contract with Venture Global), and 1.4 TWh of electricity, in commodity exchange trades and other transactions.

In 2025, the OET Group completed 58 LNG deliveries totalling 60.2 TWh (including sales under the Venture Global contract), of which around 76% was delivered to the LNG terminal in Świnoujście. Performance of the long-term contract with Venture Global commenced in April 2025. Under that contract, 14 LNG deliveries were received from the port of Calcasieu Pass. During the year, the OET Group supplied LNG to customers on three continents, including in the United Kingdom, Germany, Turkey, Egypt, Japan and China. The OET Group has contracted regasification capacity at the Montoir LNG terminal in France until 2029. In 2025, three deliveries were executed using the terminal, while 50% of the remaining capacity was sold on the market to optimise operating costs. The OET Group actively managed its contracted shipping capacity, using it to transport LNG cargoes for third parties.

ORLEN Energy Trading GmbH (“OET”), a company of the OET Group, operates on all major commodity exchanges in Europe. Under two contracts, OET receives significant volumes of gas produced from the Tyra field on the Danish Continental Shelf (“DCS”). It also sources gas from nine different producers on the Norwegian Continental Shelf and ships it mainly to Denmark, Germany, the United Kingdom and France.

In Central and Eastern Europe, OET was particularly active in Slovakia and Ukraine, where it won tender procedures for gas supplies to Ukraine. In the Baltic states, it strengthened its position through trading on the Lithuanian exchange, where it acted as an important liquidity provider. It also became a key trading partner for local counterparties and continued its activity on the GET Baltic exchange for Lithuania, Latvia and Estonia. The company won a storage capacity auction in Latvia, leveraged its storage assets for trading, and ensured the partial utilisation of ORLEN's regasification capacity with KN Energies for 2025 and the first quarter of 2026.

Small-scale LNG

In 2025, ORLEN, in cooperation with other ORLEN Group companies, sold gas in Lithuania, Ukraine, Slovakia and the Czech Republic. During the year, ORLEN was involved in supplying US-sourced LNG to Ukraine, thereby helping to build a regional gas hub based on the regasification and transmission infrastructure already in place in Poland and across the region. In 2025, the company signed five contracts with Naftogaz for the supply of regasified LNG, with a combined volume of more than 8 TWh. Deliveries were also made to E.SK, one of Slovakia’s leading gas suppliers, under a contract for the supply of regasified LNG.

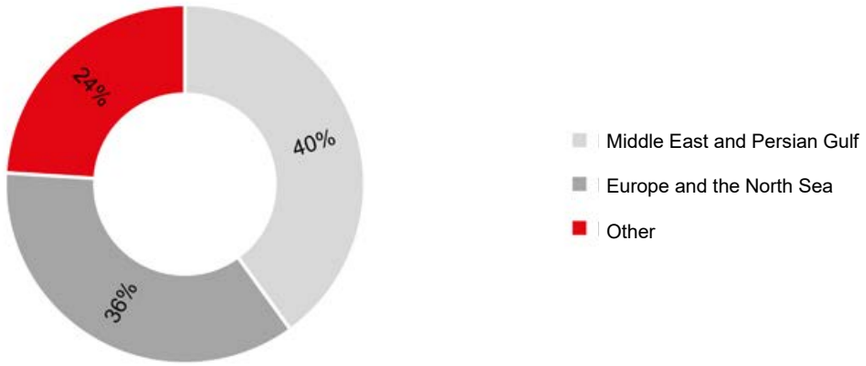
In 2025, we continued to use the small-scale LNG transshipment terminal in Klaipėda under an agreement with KN Energies. From launching operations on 1 April 2020, a total of 80 LNG shipments were received at the terminal by the end of 2025, and nearly 5.7 thousand tanker trucks departed from its loading bays, carrying approximately 1.5 TWh of LNG, primarily to Poland, as well as to Lithuania, Latvia, and Estonia. Beyond truck loading, the terminal also supports ship bunkering.

Since the beginning of 2023, we have also been receiving LNG deliveries at the FSRU terminal in Klaipėda under a long-term capacity reservation arrangement.

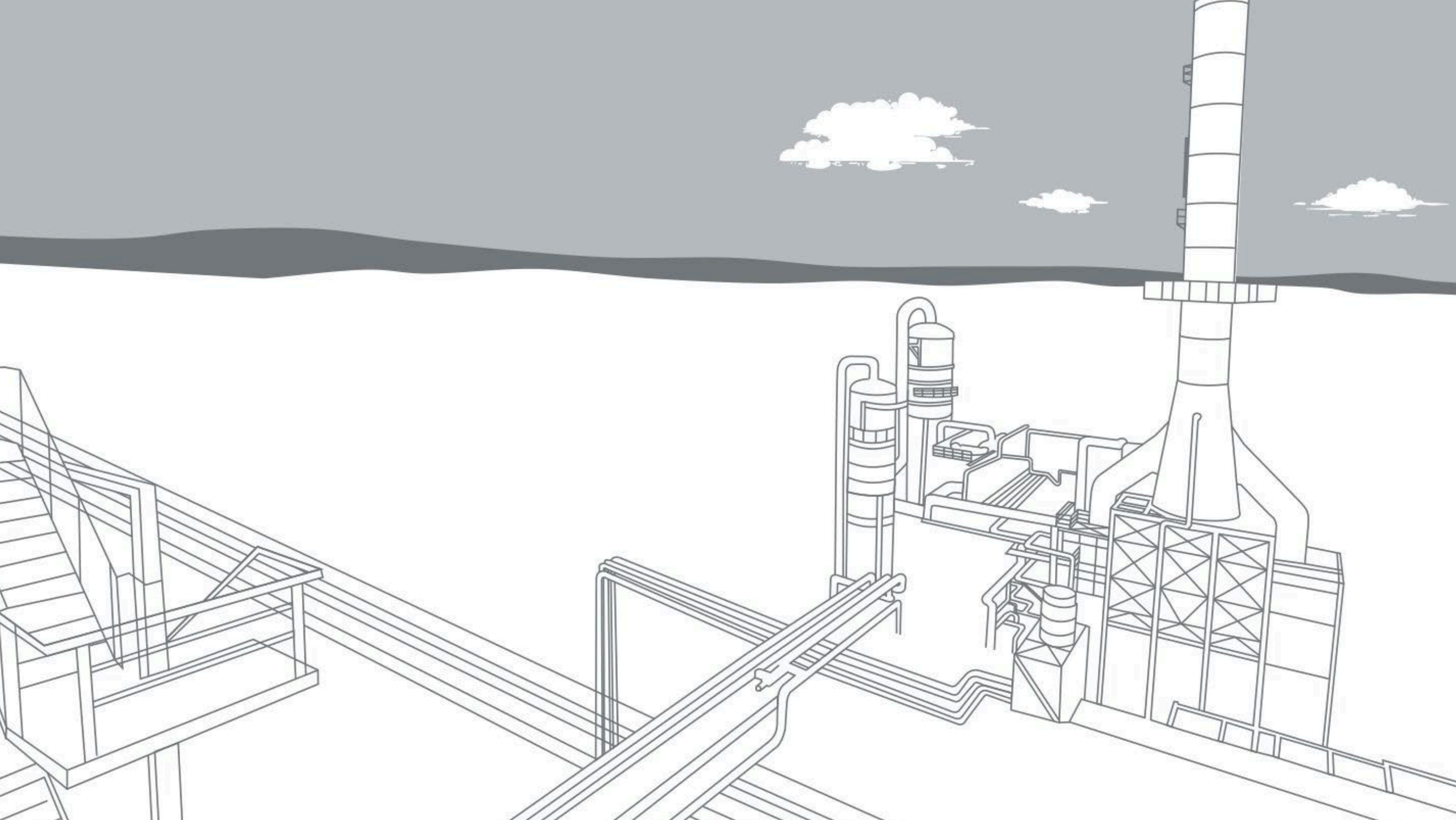
Wholesale operations in the oil market

We supply crude oil sourced from our own production and imports to refineries in Płock and Gdańsk (Poland), Litvinov and Kralupy (Czech Republic) and Mažeikiai (Lithuania).

Chart 13 Oil supply sources in 2025




ORLEN consistently seeks new sources of supply, expanding both its portfolio of suppliers and the range of crude grades it processes. These efforts are driven primarily by global market conditions, including stronger demand for refined petroleum products. Given the current processing capacity of the refineries in Poland, the Czech Republic and Lithuania, diversification of oil supply routes is essential not only for maintaining stable deliveries, but also for securing optimal contract terms.

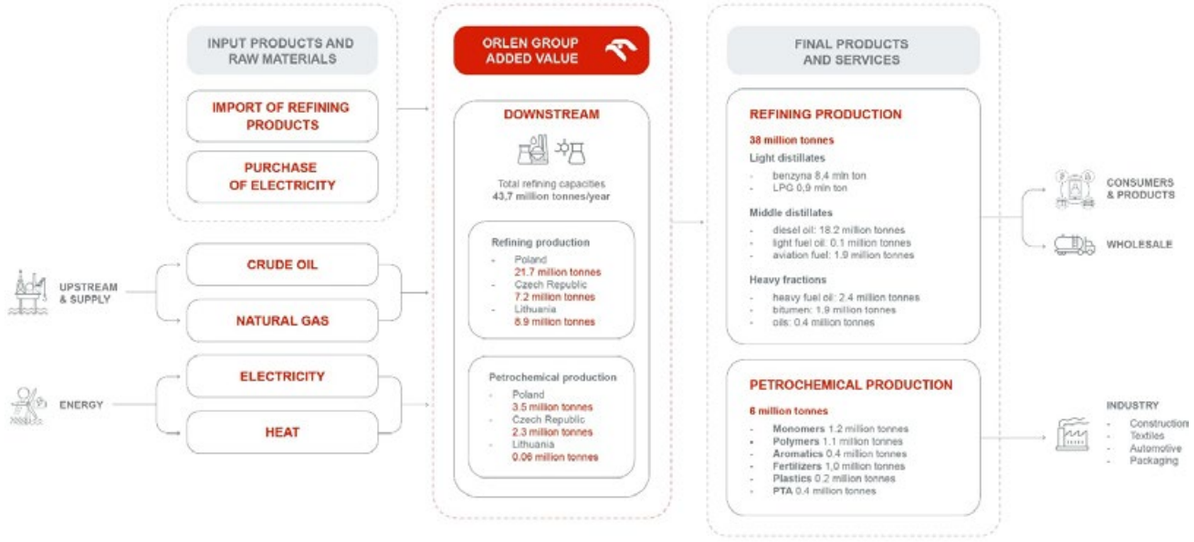


## 4.2 Downstream

The ORLEN Group's Downstream segment comprises two business lines: Refining and Petrochemicals.

We are a leader in the fuel and petrochemicals market in Central and Eastern Europe. Our refining business includes the processing of crude oil into products and wholesale sale of fuels across a number of European markets. We own seven refineries in Poland, Lithuania and the Czech Republic, with a combined annual processing capacity of 42.6 million tonnes of crude oil (approximately 860,000 bbl/d). A key competitive advantage of these refineries is their location, with access to oil and product pipelines as well as marine terminals, enabling diversification of oil supplies and facilitating the import and export of petroleum products. Our petrochemical assets are fully integrated with our refining operations, allowing us to extend the value chain. The ORLEN Group produces a broad range of petrochemical products, including monomers, polymers, aromatics, PVC, PTA and fertilisers. Our petrochemical products are sold in more than 60 countries. We are the only producer of LDPE in Poland and we are able to meet around 30% of domestic demand.

Figure 5 ORLEN Group business model by segment

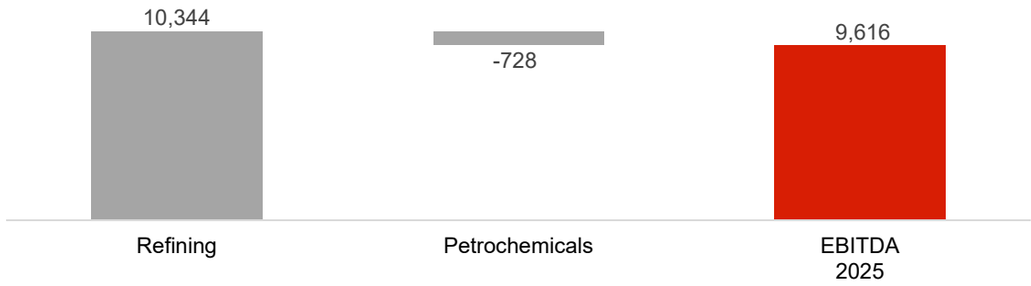



## Financial results

Table 10 Financial highlights of the Downstream segment

| [PLN million] | 2025 | 2024 | change |
|---|---|---|---|
| Segment revenue, including: | 125,007 | 141,688 | (16,681) |
| Revenue from external customers | 96,639 | 108,974 | (12,335) |
| Inter-segment revenue | 28,368 | 32,714 | (4,346) |
| Segment costs | (119,766) | (137,482) | 17,716 |
| Other operating income | 2,715 | 4,653 | (1,938) |
| Net other operating income/(expenses) | (14,279) | (17,009) | 2,730 |
| (Impairment loss)/ reversal of impairment loss on trade and other receivables | 21 | (53) | 74 |
| **LIFO-based EBITDA excluding impairment losses** | **9,616** | **7,032** | **2,584** |
| LIFO-based EBITDA | (2,703) | (5,534) | 2,831 |
| EBITDA | (3,488) | (5,570) | 2,082 |
| Operating profit (EBIT) | (6,302) | (8,203) | 1,901 |
| Capex | 9,643 | 12,271 | (2,628) |

Chart 14 LIFO-based EBITDA by business line [PLN million]



Refining PLN 10.3 billion [up PLN 2.4 billion]
(+) higher crude throughput
(+) improved refining margin
(+) higher sales volumes
(-) appreciation of the PLN against the USD

Petrochemicals PLN – 0.7 billion [up PLN 0.2 billion]
(+) appreciation of the EUR against the USD
(+) no adverse impact from the restructuring provision at Spolana recognised in 2024
(-) lower petrochemical margin; increase in fertiliser margins
(-) lower sales volumes

Table 11 Sales of the Downstream segment by product [PLN million, thousand tonnes]

| | 2025 | 2024 | 2025 | 2024 |
|---|---|---|---|---|
| | PLN million | PLN million | thousand tonnes | thousand tonnes |
| Light distillates | 17,103 | 18,994 | 5,981 | 5,737 |
| Middle distillates | 52,760 | 58,120 | 17,161 | 16,755 |
| Heavy fractions | 8,205 | 10,179 | 4,693 | 5,067 |
| Monomers | 2,726 | 3,237 | 694 | 771 |
| Polymers | 2,660 | 3,470 | 575 | 699 |
| Aromatics | 924 | 1,457 | 329 | 355 |
| PTA | 1,143 | 1,820 | 408 | 575 |
| Plastics | 743 | 972 | 189 | 248 |
| Fertilisers | 1,285 | 1,350 | 975 | 1,119 |
| Other | 9,080 | 9,375 | 4,902 | 4,871 |
| **Total** | **96,629** | **108,974** | **35,866** | **36,196** |

Table 12 Refining sales by product and by country [thousand tonnes]

| | 2025 | 2024 | Change |
|---|---|---|---|
| **Total** | **31,757** | **31,416** | **1%** |
| Gasolines | 5,320 | 5,159 | 3% |
| Diesel oil | 15,007 | 14,767 | 2% |
| LPG | 661 | 578 | 14% |
| JET fuel | 1,932 | 1,775 | 9% |
| Heavy fuel oil | 2,313 | 2,851 | -19% |
| Other | 6,524 | 6,288 | 4% |
| **Total** | **31,757** | **31,416** | **1%** |
| Poland | 18,245 | 18,202 | 0% |
| Czech Republic | 3,335 | 3,559 | -6% |
| Lithuania | 5,622 | 5,121 | 10% |
| Switzerland – ORLEN Switzerland's operations | 4,556 | 4,534 | 0% |

In 2025, we engaged in wholesale distribution of refining products in Poland, the Czech Republic, Slovakia, Hungary, Germany, Austria, Latvia, Lithuania, Estonia, and Ukraine, as well as in other international markets, where products were delivered by sea. Our home markets are Poland, Lithuania and the Czech Republic. We have an extensive portfolio of refining products, including gasolines, diesel oil, aviation fuel, light and heavy fuel oil, bitumen, engine oils and a wide range of non-fuel products and intermediates.

## Polish market

In 2025, the Polish fuel market remained strongly influenced by geopolitical and regulatory factors, including trends seen in previous years and new policy signals from the United States. EU sanctions on imports of crude oil and fuels from Russia and Belarus remained in force, necessitating further diversification of supply sources and increasing the role of feedstock from the Middle East, the United States and Africa. At the same time, the economic slowdown in Germany continued to put import pressure on the Polish market from that direction. Global markets were also affected by instability in the Middle East, in particular the ongoing tensions between Israel and Iran, the conflict in Gaza, threats to shipping in the Red Sea, and the risk of temporary supply constraints among OPEC+ countries, all of which added to crude oil price volatility. Another factor in 2025 was action taken by Donald Trump's administration, resulting in tighter sanctions on Russia and economic pressure on selected countries already subject to restrictions. Tougher sanctions on Russia's energy sector increased the geopolitical risk premium in the oil market, although Russia, as in previous years, largely maintained crude exports to Asia, chiefly to China and India. Fuel exports from Poland to Ukraine remained at a high level in 2025, making a significant contribution to the supply balance of domestic producers, including the ORLEN Group and other market participants.

In 2025, fuel consumption in Poland increased by 2.2% year on year, broadly in line with 2024. Gasoline consumption rose by 7.7% year on year, supported by lower inflation and the resulting increase in real wages. Diesel oil consumption edged up by 0.3% year on year. Consumption of light fuel oil fell by 4.5%, partly due to the high base in 2024 resulting from uncertainty over sanctions on gas imports from Russia. Market conditions in the aviation sector remained favourable, with consumption rising by 7.7% year on year.

In 2025, our Refining sales on the Polish market totalled 18,245 thousand tonnes, comparable with the previous year.

Sales of light distillates increased by 4% year on year, driven by higher sales of both gasoline and LPG. Sales of middle distillates rose by 1% year on year, reflecting broadly stable diesel oil sales and an 8% year-on-year increase in aviation fuel sales. Sales of heavy fuel oil in Poland were 3% lower year on year.

## Czech market

In 2025, both gasoline and diesel oil consumption in the Czech market increased by 1.5% year on year. The strongest growth was recorded in aviation fuel, with consumption up 4% year on year. The continued upward trend in aviation fuel demand pushed consumption above the record level seen before the pandemic in 2019. Rising consumption was supported by favourable macroeconomic conditions in the Czech Republic, with GDP growing at 2.3%, 1.1 percentage points higher than in 2024.

Refining sales in the Czech market fell by 6% year on year. Gasolines sales were down by 9% and diesel oil sales down by 7% year on year, partly due to supply constraints. in the first half of 2025, ORLEN Unipetrol's production was affected by prolonged maintenance shutdowns at the Kralupy and Litvínov refineries, and in the third quarter it was limited by power supply interruptions and failures at the petrochemical complex. In addition, supplies of Russian crude oil via the Druzhba pipeline were halted from the beginning of March 2025. During the transition period before increased transmission capacity on the TAL/IKL pipeline became available in May, the refineries relied on crude oil from strategic reserves. The external environment was not supportive either, with an oversupply of diesel oil in the region and pressure from local importers in the Czech market, as well as in the export markets of Slovakia and Hungary. The largest import volumes came from Germany, which further strengthened its dominant position compared with the previous year. Despite these supply-side challenges, we continued deliveries to the Czech market and export markets, both in the wholesale channel and for the Group's own retail network in the Czech Republic, Slovakia, Hungary, Germany and Austria. Furthermore, ORLEN Unipetrol executed intra-group transfers to the Polish market, aiding in the optimisation of the Group's product balance.

In 2025, we also continued A-1 aviation fuel sales at the Prague airport and obtained a licence for providing into-plane refuelling services at that location. The services will be launched on 1 January 2026. The company recorded a 2% year-on-year increase in Jet A-1 aviation fuel sales.

## Baltic states and Ukraine

In 2025, key macroeconomic indicators improved, particularly in Latvia and Estonia, where GDP had contracted the year before. The stronger macroeconomic backdrop was reflected in fuel consumption. Gasoline consumption rose by 2% year on year. In Latvia, it increased by 5% year on year, while diesel oil consumption was up 1.4%. In Estonia, gasoline consumption was only slightly below the previous year's level, while diesel oil consumption rose by 2% year on year. All three markets also recorded strong growth in the consumption of aviation fuel. The exception was diesel oil consumption in Lithuania, which fell by around 13% year on year, mainly due to the unprecedented increase in excise duty introduced at the beginning of 2025 (up EUR +110 per 1,000 litres). As a result, the end-user price of the product became the highest in the region, prompting consumers to seek more cost-effective alternatives. The Baltic markets were also affected by a regional oversupply. Higher fuel excise duties across all Baltic markets and in Ukraine constrained consumption in the first quarter of 2025, but conditions improved later in the year, with sales rising as customers gradually ran down inventories built up in 2024.

In 2025, ORLEN Lietuva reported a 10% year-on-year growth in Refining sales, which reached 5,622 thousand tonnes. Gasoline sales expanded by 38% year on year, reflecting the upward trend in consumption of this fuel, supported by rising sales of vehicles with spark-ignition gasoline engines, including hybrid vehicles. Meanwhile, sales of diesel oil were down 1% year on year. Bitumen sales increased by around 37% year on year in 2025, reaching a record level. ORLEN Lietuva successfully completed a project to build a unit for the physical blending of SAF biofuel with Jet A-1. After the process was launched in September, it achieved the required 2% SAF content target for all aviation customers in the Baltic region.

We continued supplying fuels to the Ukrainian market from both Lithuania and Poland. In 2025, we sold record-high volumes of gasoline and diesel oil from our refineries in Lithuania and Poland, significantly exceeding 2.2 million tonnes. As a result, the ORLEN Group became the largest fuel supplier in that market. In April 2025, we successfully launched sales of E5 gasoline, which led to a significant increase in sales volumes of this fuel. We also made the first-ever deliveries of Jet A-1 aviation fuel from the Płock refinery. Alongside fuel sales, we are also active in the bitumen and lubricant segments. There is growing interest in expanding cooperation with the ORLEN Group in refining, petrochemicals, upstream and energy.

ORLEN Lietuva was an important contributor to balancing shortages in the Polish market. Significant quantities of diesel oil and gasolines were delivered in 2025 both via land, through the Mockava transshipment terminal, and by sea.

Table 13 Petrochemical sales by product and by country [thousand tonnes]

| | 2025 | 2024 | Change |
|---|---|---|---|
| **Total** | **4,108** | **4,779** | **-14%** |
| Olefins | 694 | 771 | -10% |
| Polyolefins | 575 | 699 | -18% |
| Fertilisers | 975 | 1,119 | -13% |
| PVC | 189 | 248 | -24% |
| PTA | 408 | 575 | -29% |
| Other | 1,267 | 1,367 | -7% |
| | | | |
| **Total** | **4,108** | **4,779** | **-14%** |
| Poland | 2,857 | 3,264 | -12% |
| Czech Republic | 1,191 | 1,450 | -18% |
| Lithuania | 60 | 65 | -8% |

In 2025, sales volumes of our key petrochemical products, including monomers, polymers, aromatics, fertilisers, plastics and PTA, totalled 3,128 thousand tonnes, down 17% year on year. The sharpest declines were recorded in plastics (down 24% year on year) and PTA (down 29% year on year), driven by production issues, lower demand from European customers, and intensifying competition from imports.

Fertiliser sales fell by 17% year on year in 2025, mainly due to the shutdown of the ammonium sulphate plant at Spolana in the Czech Republic.

2025 was marked by a challenging market environment, which led to lower contract and spot prices and, as a result, affected our ability to achieve target margins and place higher volumes on the market. Customers for our petrochemical products include Polish and international manufacturing companies operating across Europe. These products are used in most key industries, including construction, textiles, packaging and automotive.

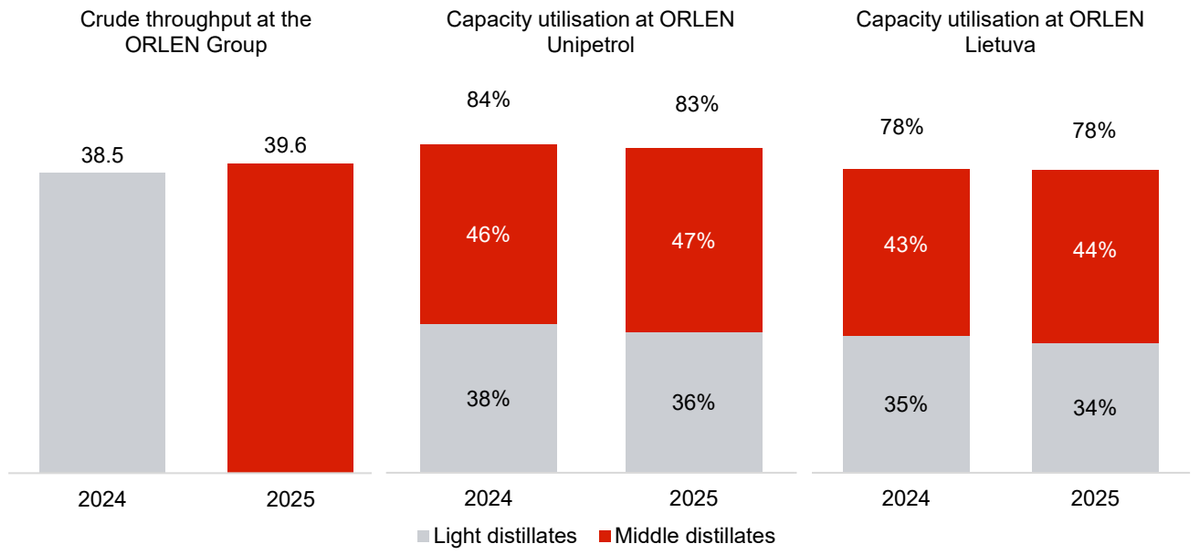
## Refining operations

Total annual throughput capacity of the ORLEN Group's refineries stands at 42.6 million tonnes.

In 2025, we processed 39.6 million tonnes of crude, a increase of 3% year on year, including:

- in Poland – throughput volumes broadly on a par year on year;
- in the Czech Republic – throughput rose by 7% year on year, driven by very strong refining margins, high fuel demand, and the absence of the negative effect of the scheduled shutdown at the Litvínov refinery that occurred in 2024;
- in Lithuania – throughput increased by 6% year on year, supported by a favourable macroeconomic environment.

Chart 15 Crude oil throughput [thousand tonnes] and capacity utilisation [%]



## Table 14 ORLEN Group's refining production by country [thousand tonnes]

| | 2025 | 2024 | Change % |
|---|---|---|---|
| **Total** | **37,783** | **37,656** | **0%** |
| Poland | 21,709 | 22,582 | -4% |
| Czech Republic | 7,167 | 6,694 | 7% |
| Lithuania | 8,907 | 8,380 | 6% |

We source crude oil for processing through a combination of long-term contracts and spot purchases.

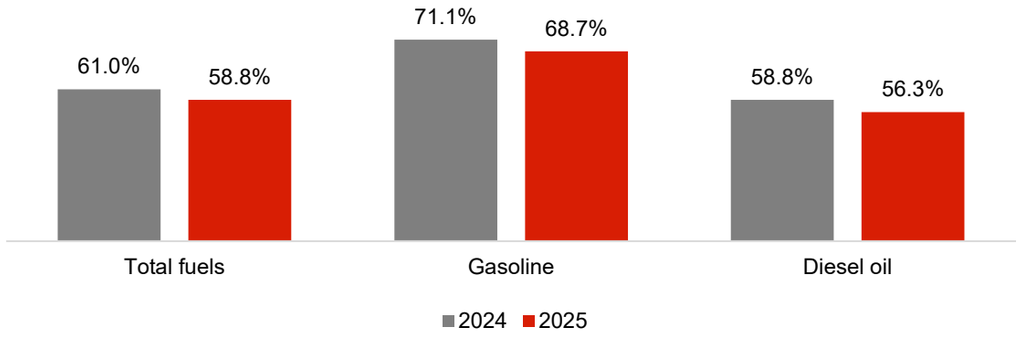
Long-term contracts account for around 55% of the supplies.

In 2025, under our contractual arrangements, we purchased crude oil:

- delivered by sea, from Saudi Aramco (Saudi Arabia), BP and Equinor (Norway);
- delivered via pipeline, from Rosneft in Russia, with that contract expiring in June 2025.

The main crude grades processed by our refineries are Arab Light, Johan Sverdrup and Azeri Light.

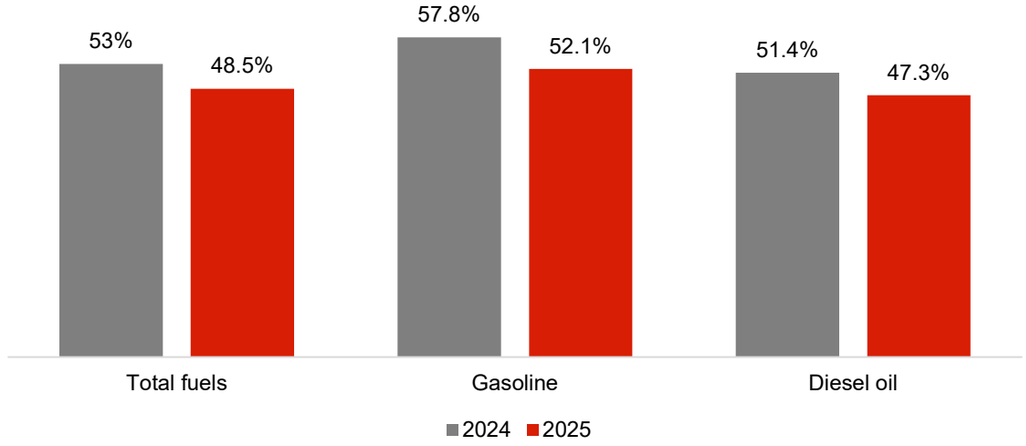
## Chart 16 ORLEN Group’s fuel market shares in Poland




Source: In-house analysis.

- Our market shares declined as fuel consumption in Poland rose, while the Polish refineries maintained a stable, very high output.
- We remain the main supplier for major foreign fuel companies operating in Poland (BP, Shell, Amic, Circle K).

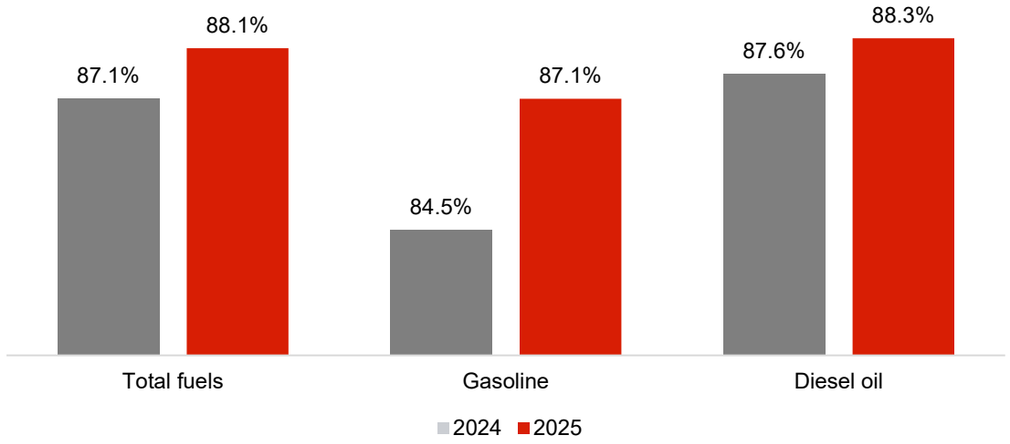
## Chart 17 ORLEN Group’s fuel market shares in the Czech Republic




Source: In-house analysis.

- Despite supply disruptions at our refinery in the Czech Republic, our combined market share reached 48%.
- The year-on-year decline of approximately 5 percentage points was due to the production-related constraints and a pronounced oversupply of fuel products, especially diesel oil, in the region.

Chart 18 ORLEN Group's fuel market shares in the Baltic states




Source: In-house analysis

## Lithuania

- We maintained our leading position in the gasoline market, with market share broadly unchanged year on year.
- Our share of the diesel market contracted by around 5 percentage points, the reason being a substantial increase in fuel excise duty in 2025, which reduced consumption among some ORLEN Lietuva customers in the agricultural and international transport sectors, as well pressure from importers and aggressive pricing by competitors from Scandinavia.

## Latvia

- Our combined share of the gasoline and diesel oil markets expanded by approximately 1 percentage point year on year.

## Estonia

- We significantly improved our combined market share, by approximately 12 percentage points, mainly on the back of a strong gain in the diesel oil segment, as international transport operators chose to refuel in Estonia rather than Lithuania, which became the region's most expensive market following the excise duty increase.

# Petrochemical operations

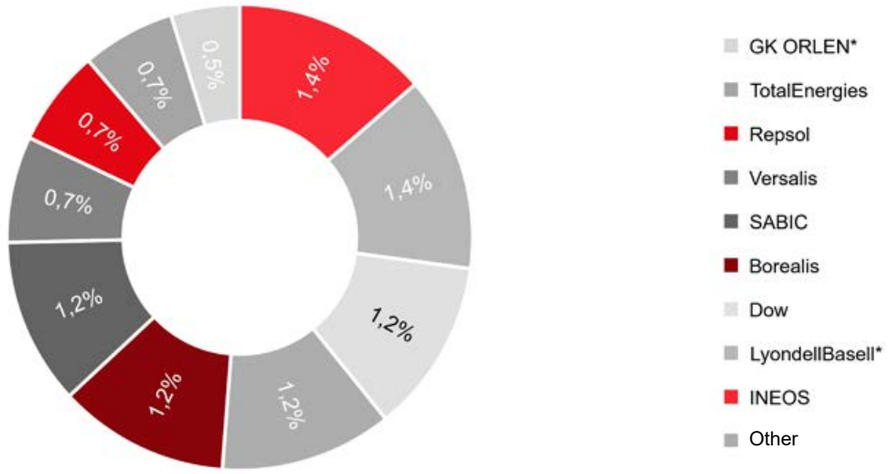
ORLEN is the only producer of ethylene glycols and purified terephthalic acid (PTA) in Central Europe, and a major manufacturer of monomers and polymers. ORLEN Group's petrochemical operations are concentrated in two main locations: Płock in Poland and Litvínov in the Czech Republic.

The combined production capacity of our assets in Poland and the Czech Republic (including a 50% share in BOP) is approximately 700 thousand tonnes annually for polyethylene (annual production capacities in Europe: approximately 16 million tonnes), and some 600 thousand tonnes annually for polypropylene (annual production capacities in Europe: approximately 11 million tonnes). ORLEN is the only manufacturer in Europe to have PTA production units fully integrated with paraxylene production, and its annual PTA production capacity stands at 690 thousand tonnes (nameplate production capacities in Europe: approximately 2 million tonnes annually). With our annual plastics production capacity of 475 thousand tonnes, we rank fifth on the European market (nameplate production capacities in Europe: approximately 6.5 million tonnes annually).

Table 15 ORLEN Group's petrochemical production by country [thousand tonnes]

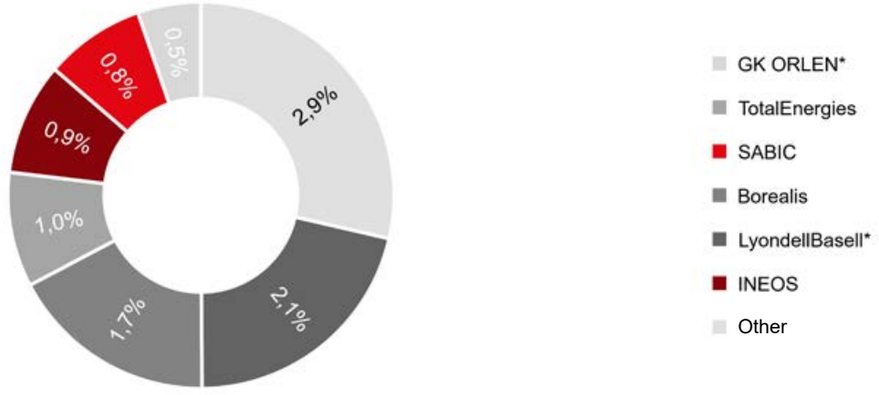
| | 2025 | 2024 | Change % |
|---|---|---|---|
| **Total** | **5,892** | **7,123** | **-17%** |
| Poland | 3,522 | 4,069 | -13% |
| Czech Republic | 2,310 | 2,987 | -23% |
| Lithuania | 60 | 66 | -9% |

## Chart 19 Polyethylene manufacturers in Europe in 2025



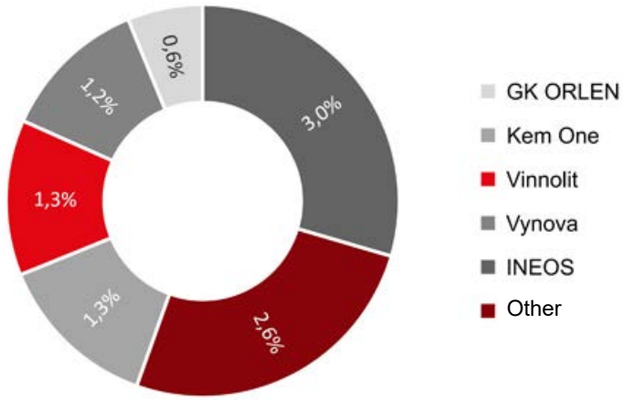

* Including a 50% interest in BOP.
Source: In-house analysis based on Market Analytics: Polyolefins (December Update) – 2025 (Nexant).

## Chart 20 Polypropylene manufacturers in Europe in 2025



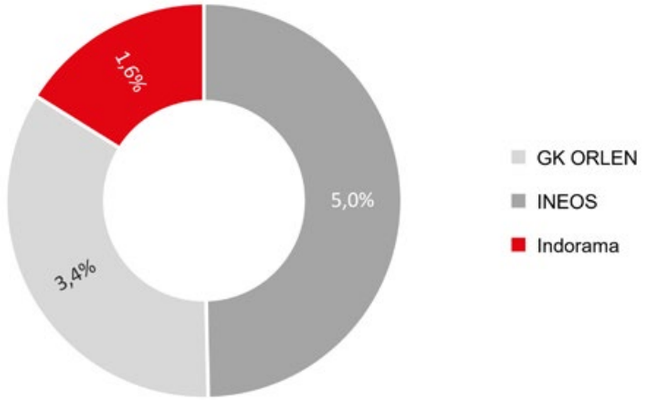

* Including a 50% interest in BOP.
Source: In-house analysis based on Market Analytics: Polyolefins (December Update) – 2025 (Nexant).

## Chart 21 PVC manufacturers in Europe in 2025




Source: In-house analysis based on Market Analytics – Vinyls – 2025 (Nexant).

## Chart 22 PTA manufacturers in Europe in 2025




Source: In-house analysis based on Market Analytics – Vinyls – 2025 (Nexant).

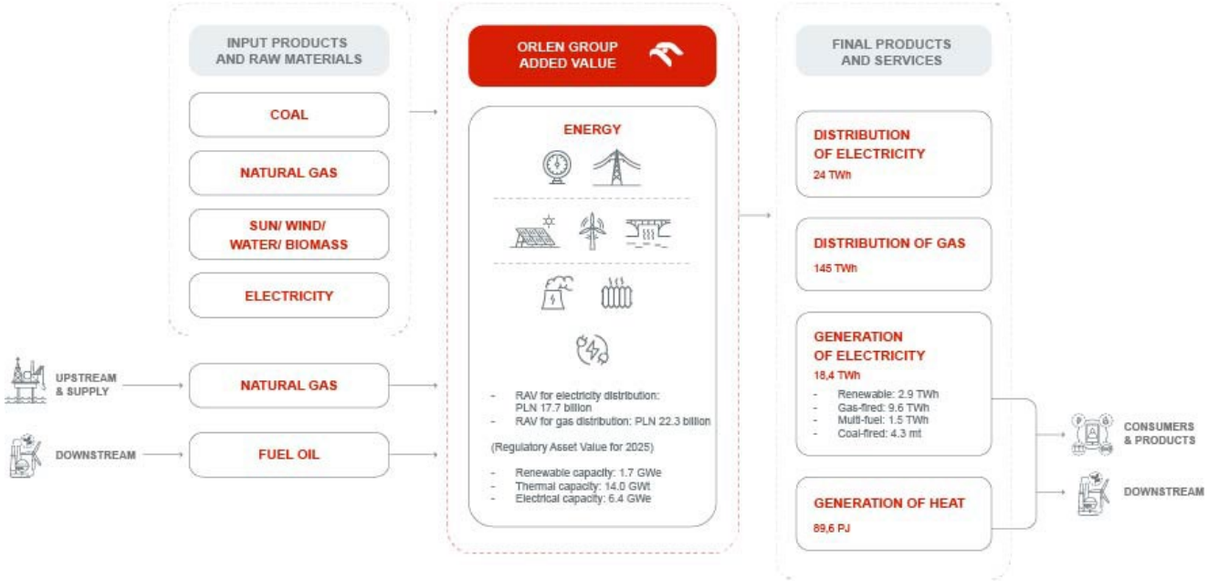

ORLEN
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## 4.3 Energy

We are the largest distributor of natural gas and one of the leading distributors of electricity in Poland, while also ranking among the country's key producers of electricity (12% market share) and heat. Our energy generation assets are located in three countries: Poland, the Czech Republic and Lithuania, with renewable energy accounting for a significant share of total output. The Energy segment sits at the core of the ORLEN Group's business model. It uses feedstocks supplied by other segments, and its products, including electricity, heat and gas, are supplied to the Group's own operating assets as well as to third-party customers.

The key subsidiaries in the Energy segment include Polska Spółka Gazownictwa Sp. z o.o., Energa-Operator S.A., ORLEN Termika S.A. and ORLEN Energia.

Figure 6 ORLEN Group business model by segment

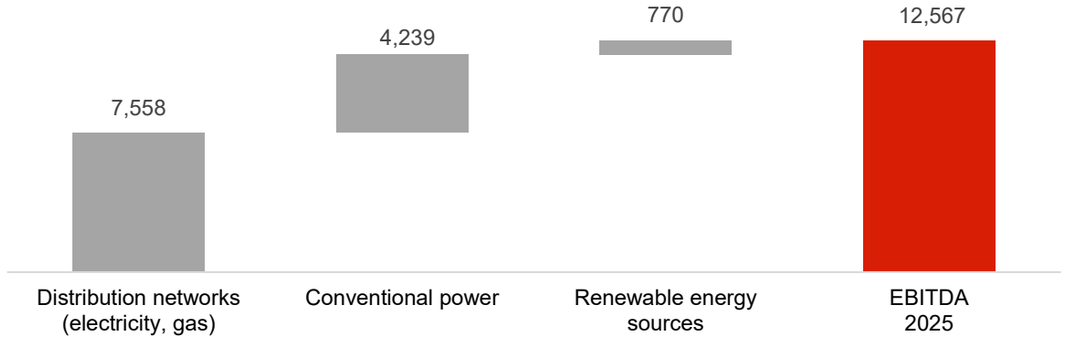



## Financial results

Table 16 Financial highlights of the Energy segment

| [PLN million] | 2025 | 2024 | change |
|---|---|---|---|
| Segment revenue, including: | 47,392 | 49,214 | (1,822) |
| Revenue from external customers | 27,786 | 26,962 | 824 |
| Inter-segment revenue | 19,606 | 22,252 | (2,646) |
| Segment costs | (39,374) | (42,057) | 2,683 |
| Other operating income | 683 | 54 | 629 |
| Net other operating income/(expenses) | (1,927) | (811) | (1,116) |
| (Impairment loss)/ reversal of impairment loss on trade and other receivables | 65 | (40) | 105 |
| **LIFO-based EBITDA excluding impairment losses** | **12,567** | **10,896** | 1,671 |
| LIFO-based EBITDA | 11,230 | 10,353 | 877 |
| EBITDA | 11,230 | 10,353 | 877 |
| Operating profit (EBIT) | 6,839 | 6,360 | 479 |
| Capex | 10,688 | 9,575 | 1,113 |

Chart 23 LIFO-based EBITDA by business line [PLN million]



Distribution networks (energy, gas)
PLN 7.6 billion [up PLN 1.5 billion]
(+) higher margins on electricity and gas distribution
(+) increased electricity and gas distribution volumes

Conventional power generation
PLN 4.2 billion [up PLN 0.2 billion]
(+) higher electricity and heat output and sales
(-) lower wholesale margins in electricity and heat generation and distribution business
(-) higher CO2 emission costs,

Renewables
PLN 0.8 billion
(+) renewable electricity generation up 18%

Table 17 Electricity and useful heat volumes sold to customers outside ORLEN Group

| | 2025 | 2024 |
|---|---|---|
| **Electricity [TWh]** | **28.5** | **28.6** |
| sold on the retail market | 16.9 | 16.4 |
| sold on the wholesale market | 11.6 | 12.2 |
| **Heat [PJ]** | **46.8** | **46.0** |

## Operations

Table 18 Installed capacity of power generating units by type of fuel

| | Renewable energy sources (sun, wind, water) | CHP plants (excluding CCGT plants) | | | | Heat plants | | | CCGT plants | Commercial power plant | Other assets |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | gas | coal | biofuels | other fossil fuels | gas | coal | other fossil fuels | gas | coal | |
| Installed electrical capacity [MWe] | 1,597 | 171 | 1,174 | 69 | 649 | - | - | - | 1,845 | 690 | 163 |
| Installed thermal capacity [MWt] | - | 255 | 4,195 | 272 | 3,922 | 1,261 | 1,741 | 655 | 1,450 | 220 | - |

As at the end of 2025, we operated energy assets with the installed capacity of 6.4 GWe, with renewable energy assets accounting for 27% and gas-fired assets for 32% of the total. Our thermal capacity stood at 14.0 GWt.

In 2025, our net electricity production reached 18.4 TWh, including 2.9 TWh from renewable sources, while total heat production was 89.6 PJ.

Sales to third-party customers totalled 28.6 TWh of electricity and 46.8 PJ of heat.

Table 19 Electricity and useful heat production volumes

| | 2025 | 2024 |
|---|---|---|
| **Electricity [TWh]** | **18.4** | **16.8** |
| Renewable energy sources | 2.9 | 2.4 |
| Gas-fired generating units | 9.6 | 9.3 |
| Multi-fuel generating units (mainly fuel oil) | 1.5 | 1.3 |
| Coal-fired generating units | 4.3 | 3.7 |
| Other | 0.1 | 0.1 |
| **Heat [PJ]** | **89.6** | **86.7** |

## Distribution networks (natural gas, electricity)

The leading ORLEN Group companies within this business line are Polska Spółka Gazownictwa Sp. z o.o. (PSG), whose assets are located across Poland, and Energa Operator S.A., managing infrastructure in northern and central parts of the country.

Natural gas and electricity distribution is a regulated activity in Poland, subject to tariffs approved by the President of the Energy Regulatory Office (URE). Approved tariffs ensure recovery of investment expenditure (incurred on upgrades, infrastructure replacement and renewable energy integration), as well as fixed costs (such as costs of network maintenance, dispatch and metering), and regulatory system charges. The fixed tariff components provide operators with financial stability even when consumption volumes change, while the variable components reflect system load and the cost of transmitting electricity and gas in individual periods.

## Gas distribution

At the end of 2025, our gas distribution network spanned 215.2 thousand kilometres. Being the owner of the major part of the gas distribution network and gas service lines located in Poland, PSG enjoys a dominant market share. As at the end of 2025, distribution services were provided in 1,734

municipalities, or 70% of all municipalities in Poland. During the year, we delivered 140.1 TWh of gaseous fuels to approximately 7.7 million customers.

In 2025, PSG, ORLEN S.A. and OGP GAZ-SYSTEM S.A. launched a three-party cooperation project. As part of this initiative, they began testing network components and end-user appliances using the research, testing and experimental facility in Odolanów, with a view to verifying the safety and performance of gas infrastructure operating with natural gas and hydrogen blends.

During 2025, the Oil and Gas Institute – National Research Institute, acting as the implementing body under the FEnIKS programme, selected 20 PSG investment projects for funding, and grant agreements were signed for 18 of them. The planned cost of all 20 investment projects totals PLN 2.26 billion, VAT-exclusive, and the amount of funding is PLN 1.25 billion. The total length of gas distribution pipelines to be upgraded or constructed as part of the projects is approximately 689 km.

In September 2025, the first biomethane production plant was connected to the PSG gas network, and a further 10 connection agreements for such plants were signed. At present, 19 agreements are in place, with a total connection capacity of 10,088 $m^3/h$.

The capital expenditure we incurred on the gas distribution network in 2025 totalled PLN 2.6 billion and included spending on network expansion, upgrades and acquisition, as well as gas meters and telemetry systems. PSG entered into nearly 41 thousand new service-line contracts, providing for the construction of nearly 47 thousand service lines. By the end of 2025, nearly 90 thousand grid connection permits were issued. During the year, PSG began distributing gas to 97.6 thousand new customers, with an estimated volume of 78.3 mcm, while 53,655 service contracts were terminated, with an estimated annual volume of approximately 14.8 million mcm.

### Electricity distribution

The power lines operated by Energa Operator had a total length of more than 200 thousand km and covered spanned almost one-fourth of Poland's territory. They supplied 22,9 TWh of electricity (representing nearly 14 % of domestic consumption) to 3.4 million customers.

Energa Operator's capital expenditure totalled approximately PLN 3.1 billion, with most of the spending focused on modernising and replacing existing assets, improving service quality, meeting rising demand for capacity, and connecting new customers and electricity generation sources, along with the related development of new network infrastructure. In 2025, the number of customers, measured by energy offtake points (consumption metering points), increased by around 51.2 thousand year on year, representing growth of 1.5%. Another key metric is the increase in capacity connected to the Energa Operator's network, which rose by 963.1 MW, or 9%.

ORLEN Energomedia Operator, another electricity distribution company within the ORLEN Group, supplied electricity to 151 customers as at the end of 2025. The company serves customers in tariff groups C11, C21 and B21, and has no customers in tariff group G. The length of its distribution network is 66.07 km. ORLEN Energomedia Operator also carries out projects aimed at modernising and expanding the distribution network, adapting the network and metering systems to applicable regulations, and connecting new customers to the grid.

## Conventional power generation

### Utility-scale power generation

The segment comprises power generation assets that produce electricity and heat primarily from biomass and fossil fuels, such as natural gas and coal. These comprise modern combined-cycle gas turbine (CCGT) units in Płock, Stalowa Wola, Warsaw, and Włocławek, as well as CHP plants, supplying electricity and heat mainly to industrial facilities. Our portfolio also includes the Ostrołęka commercial power plant, which supplies electricity to the national power system.

In 2025, we continued a number of major projects, including the construction of CCGT plants: Grudziądz #1 with a capacity of 583 MW, and Ostrołęka with a net capacity of 745 MW. Both projects were awarded capacity market support for 17 years starting from 2026. At the end of the year, each of them reached a stage enabling the start of initial commissioning activities. Completion of the projects is scheduled for the fourth quarter of 2026 and the first quarter of 2027, respectively. In addition, work was ongoing on the construction of the Grudziądz #2 and Gdańsk CCGT units, each with a capacity of approximately 560 MW. They are in an early development phase: engineering, construction and long-term maintenance contracts have been signed, and preparatory work has begun, including site development and securing access to the necessary utilities. Completion of both plants is planned for 2029.

At the Litvínov CHP plant, we continued a project to phase out coal-fired generation by replacing old units with two modern gas-fired boilers with a total installed thermal capacity of 280.2 MWt. The system will be designed to operate under variable demand conditions, with project completion scheduled for the end of 2028. As part of our asset decarbonisation programme, we also completed in 2025 the conversion of Boiler No. 3 at the Ostrołęka power plant to enable 50% biomass co-firing. This made the unit eligible to participate in capacity market auctions for 2027–2031. The conversion was necessary to comply with regulations allowing only units with $CO_2$ emissions below 550 t/MWh to participate in the capacity market.

#### Capacity market

In the main capacity market auction for 2030, held in 2025, we secured capacity obligations totalling 846 MW. Seven-year capacity agreements were awarded to our three modernised generating units with a combined capacity of 22,867 MW: the Elbląg CHP plant (Energa Kogeneracja), and the Straszyn and Strzegomino hydropower plants (Energa Wytwarzanie). In addition, in the supplementary auction for 2029, our combined-cycle gas turbine plants, CCGT Gdańsk and CCGT Grudziądz II, were awarded 17-year capacity agreements for 525 MW each. In total, the ORLEN

Group secured agreements for 1,239 MW at a price of PLN 534.09 kW/year. Both projects, each with a planned capacity of approximately 560 MW, remain in an early development phase. Engineering, construction and long-term maintenance contracts have been signed, and preparatory work has begun, including site development and securing access to the necessary utilities. Completion of both plants is planned for 2029.

Table 20 Revenue from capacity contracts [PLN million]

| | 2026 | 2027 | 2028 | 2029 | 2030 |
|---|---|---|---|---|---|
| **Total** | 1,358 | 1,053 | 868 | 1,548 | 1,635 |
| Non-indexed | 768 | 398 | 213 | 307 | 383 |
| Indexed* | 590 | 655 | 655 | 1,241 | 1,252 |

* Revenue indexed to inflation.

## Heat generation and distribution

We own heat generation and distribution assets located in Upper Silesia, the Warsaw metropolitan area and in a number of towns, including Przemyśl, Elbląg, Kalisz and Ostrołęka. Our key assets are Poland's largest municipal CHP plants at Siekierki and Żerań. The leading ORLEN Group companies within this business line are ORLEN Termika S.A. and Energa Group companies.

Heat generation and distribution is a regulated activity in Poland, conducted based on tariffs approved by the President of the Energy Regulatory Office (URE). Approved tariffs ensure recovery of justified operating costs, with heat prices and tariff rates calculated on the basis of planned revenues from heat generation, including revenues from cogeneration units determined using the simplified method, the reference index and average heat sales prices. As a result, the tariffs reflect the actual costs of fuel, $CO_2$, operation, maintenance and depreciation, while allowing for a reasonable return on capital.

We are pursuing a broad modernisation and transformation programme in our heat generation and distribution business, including a phase-out of coal by 2035 and the development of modern gas, renewable and heat storage technologies. As part of this programme, in 2025 we commissioned a flue gas condensation system at the Siekierki CHP plant to increase recovery of waste heat and a gas- and oil-fired boiler house with a capacity of approximately 220 MWt at the Kawęczyn heating plant, obtained an environmental decision for a 6x38 MWt gas-fired boiler plant, and commissioned a gas engine room at the Pruszków CHP plant with total electrical capacity of 12 MWe and thermal capacity of approximately 12 MWt.

We also continued preparations for key projects to be implemented in the coming years, including:

- initiation of stage two of the contractor selection process for a new Class 500 MWe CCGT unit at the Siekierki CHP plant. The unit will be a key source of heat and electricity for the region, improving system efficiency and enabling a significant reduction in $CO_2$ emissions. Signing of the construction contract is scheduled for March 2027;
- handover of the construction site to the contractor and commencement of earthworks for the installation of a heat accumulator at the Żerań CHP plant. Commissioning is planned for the third quarter of 2027;
- demolition work at the future site of the flue gas condensation systems and heat pumps for the CCGT unit and gas-fired boiler house at the Żerań CHP plant. The new source will use waste energy resources and, by reducing heat generation from existing fossil-fuel-based assets, will help cut $CO_2$ and other emissions;
- commencement of the construction of a 3x14.9 MWt biomass-fired boiler house at the Pruszków CHP plant, with commissioning scheduled for November 2027.

## Electricity trading

As part of a project designed to integrate and centralise wholesale electricity trading and related services, Energia Sp. z o.o. became the competence centre and market access platform for ORLEN Group energy companies.
In 2025, it sold nearly 18 TWh of electricity to customers outside the Group. Beyond electricity trading, the company trades in guarantees of origin, provides trading and technical operator services, portfolio management services, and acts as the intra-Group brokerage house operating on the Polish Power Exchange.

## Energy services

Specialist services within our Energy segment are provided by Energa Group companies in such areas as comprehensive lighting of streets, squares and other municipal open spaces, demand response services during peak demand times or periods of stress on the National Power System, management of IT applications and infrastructure, and provision of information security services across the ORLEN Group.

# New energy

As at the end of 2025, our renewable energy portfolio comprised over 650 MW of installed capacity in 19 wind farms and nearly 740 MWp in solar assets, complemented by several dozen solar photovoltaic micro-installations at service stations. We also own and operate hydropower plants, including the 162 MW Włocławek run-of-river hydropower plant, the largest facility of its kind in Poland, and the Żydowo pumped storage power plant, which serves as an energy storage facility. Additionally, electricity is generated at 45 small hydropower plants, primarily located in northern Poland, with a total installed capacity of approximately 40 MW.

Together with a partner, we are currently constructing the first wind farm off the Polish coast and conducting preparatory work for the development of further areas under licences in the Baltic Sea.

Baltic Power, a joint venture of the ORLEN Group (51%) and Northland Power (49%), is Poland's most advanced offshore wind project and the only one with offshore construction already under way. It has a planned capacity of approximately 1.2 GW and is scheduled to begin generating electricity in 2026. At the start of 2025, the offshore installation campaign commenced, covering the installation of monopile foundations, wind turbines and offshore substations to transmit the generated electricity to the shore. As at the end of December 2025, the project was 70% complete. In April 2025, the President of the Energy Regulatory Office made a commitment to grant a generation licence to Baltic Power.

Baltic East, our offshore wind project with a planned installed capacity of up to 900 MW, participated in the offshore wind auction held on 17 December 2025 and was awarded support in the form of a 25-year two-way contract for difference, providing a predictable revenue stream and stable investment conditions. In 2025, the project was in the permitting and financing phase.

In 2025, ORLEN Neptun completed construction of the offshore wind farm installation terminal in Świnoujście, which will serve as key infrastructure for the delivery of offshore wind projects in the Baltic Sea.

We are actively developing our renewable energy portfolio by investing in new energy sources, expanding existing assets, and pursuing acquisitions. Renewable projects we completed in 2025 included:

- the Sompolno hybrid project – the first licenced project of this kind in Poland, combining a wind farm, a solar PV system and an energy storage facility, with 27 MW of wind capacity, 10 MWp of solar capacity, and a 3 MW energy storage unit ready for construction;
- the Przykona solar PV farm – at the time it received its generation licence, it was the largest solar PV project in Poland, with a capacity of 200 MWp; it was acquired from EDP Renewables in 2024 and expanded in 2025 by a further 40 MWp;
- PV Mitra, with a capacity of 65.6 MWp – a brownfield solar PV project developed at the former Adamów lignite open-pit mine, one of the largest projects of this type.

To support the balancing of renewable generation, we take part in the National Fund for Environmental Protection and Water Management's programme Electricity Storage Facilities and Related Infrastructure to Improve the Stability of the Polish Power System. As part of the project, we secured non-repayable funding for up to 45% of total investment costs for energy storage projects with a combined capacity of 121 MW and storage volume of 476 MWh, to be co-located with renewable energy sources.

In the second half of 2025, construction began on an energy storage facility with a capacity of 2 MW and storage volume of 4 MWh at the Włocławek CCGT plant. In 2026, it will be integrated with the solar PV system already operating on the site, significantly improving its efficiency and profitability.

## Hydrogen

### Low-carbon automotive-grade hydrogen

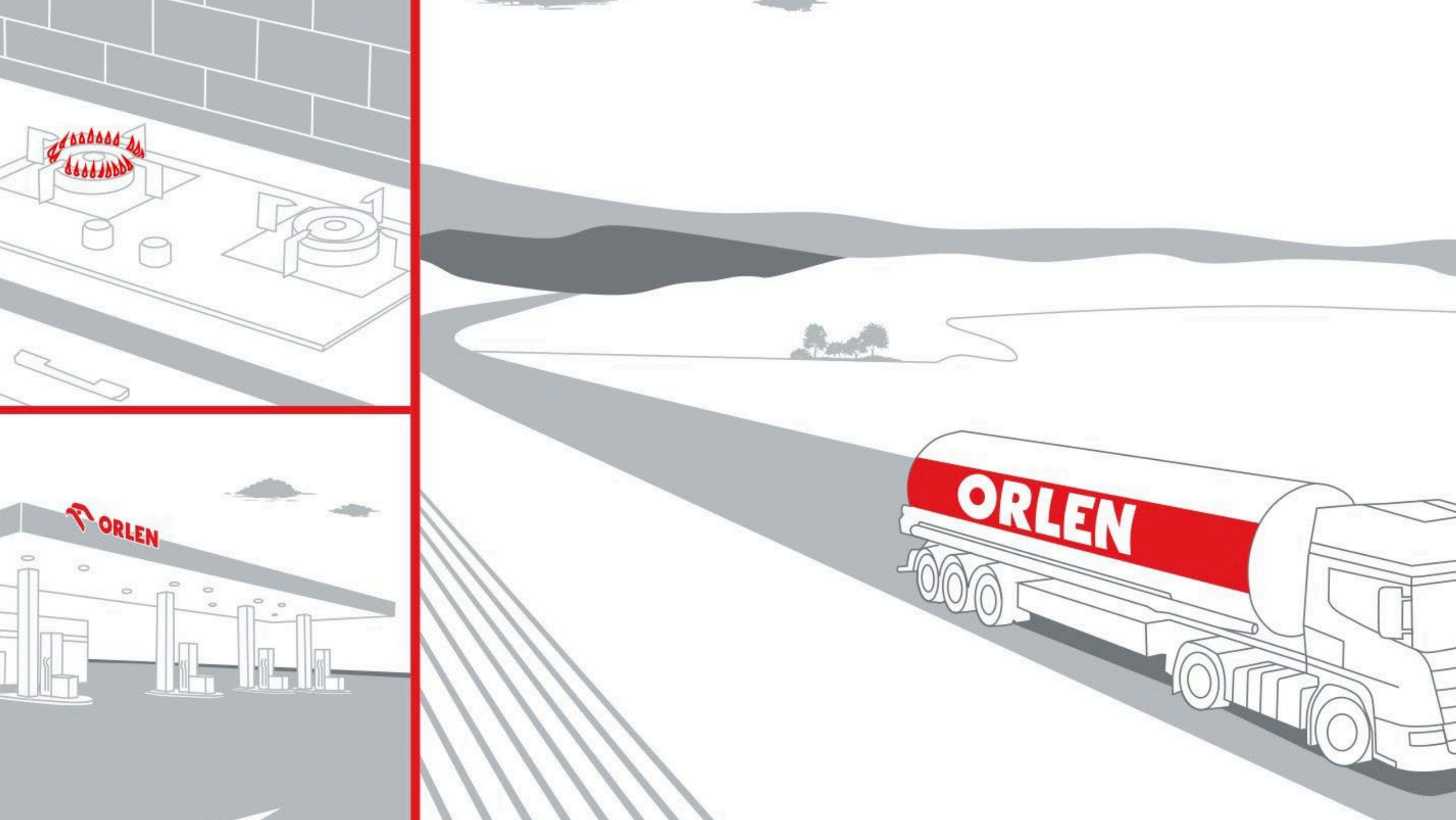
In 2025, we supplied more than 155 tonnes of low-carbon hydrogen fuel to the automotive market. The fuel was used primarily in public transport.

### Renewable and low-carbon hydrogen

We continue to develop projects supporting the hydrogen transition, including both renewable hydrogen production (RFNBO) and low-carbon technologies. Under our Hydrogen Programme, we plan to build electrolysers with total capacity of 400 MW to replace hydrogen produced from natural gas with renewable hydrogen in refining processes. In 2025, we secured PLN 1.7 billion in non-repayable funding under the National Recovery and Resilience Plan for the Green H2 and Hydrogen Eagle projects, with a significant portion of the funds to be allocated to the construction of 200 MW electrolysers. At the same time, preparatory work began on the implementation of other projects under the Hydrogen Programme.

One of the key directions is the waste-to-hydrogen technology, involving conversion of non-recyclable municipal waste into low-carbon hydrogen. The first project of this type received grant support in 2025 under the Hydrogen Eagle programme. In parallel, ORLEN S.A. is developing hydrogen-powered mobility business. In 2025, additional refuelling stations were commissioned in Wałbrzych and Włocławek for 700/350 bar vehicles, and a number of hydrogen supply contracts were signed, for instance with the local authorities in Wałbrzych and Piła. The hydrogen refuelling network is complemented by two production hubs in Włocławek and Trzebinia, while further hubs are planned in Gdańsk, Szczecin and southern Poland.

In the synthetic fuels area, ORLEN S.A. continued preparations for the HyFly project, aimed at producing e-jet fuel from renewable hydrogen and biogenic CO2 in line with the requirements of the ReFuelEU Aviation Regulation. The Company is also pursuing initiatives related to imports of low-carbon ammonia as a feedstock for fertiliser production.


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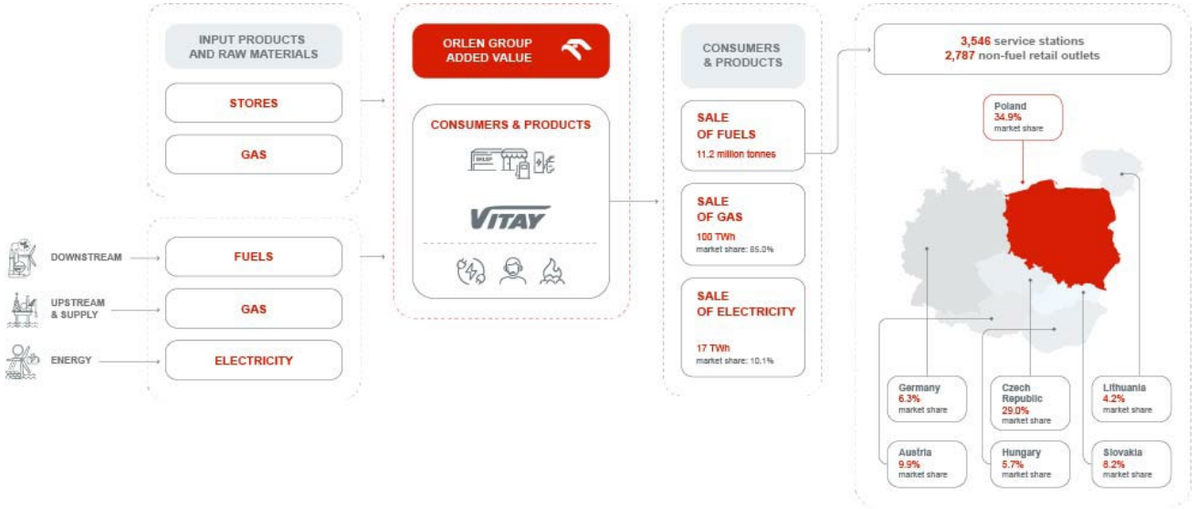
## 4.4 Consumers and Products

The ORLEN Group's retail operations span the sale of fuels, electricity and gas.

Our fuel retail business comprises a network of more than 3,500 service stations across seven countries. ORLEN stands as the largest and most modern service station network in Central and Eastern Europe, with nearly 2,800 stations offering non-fuel products and services and almost 1,000 providing alternative refuelling options, including EV charging, CNG and hydrogen. We have more than 5 million active VITAY users and nearly 0.4 million active FLOTA users.

At the beginning of 2026, we launched the new MyOrlen brand to consolidate our retail business. This will allow us to offer customers integrated energy services and further develop the ORLEN VITAY platform. The new formula will also facilitate more efficient management of electricity, gas and fuel services, alongside modern solutions for homes and businesses.

Figure 7 ORLEN Group business model by segment

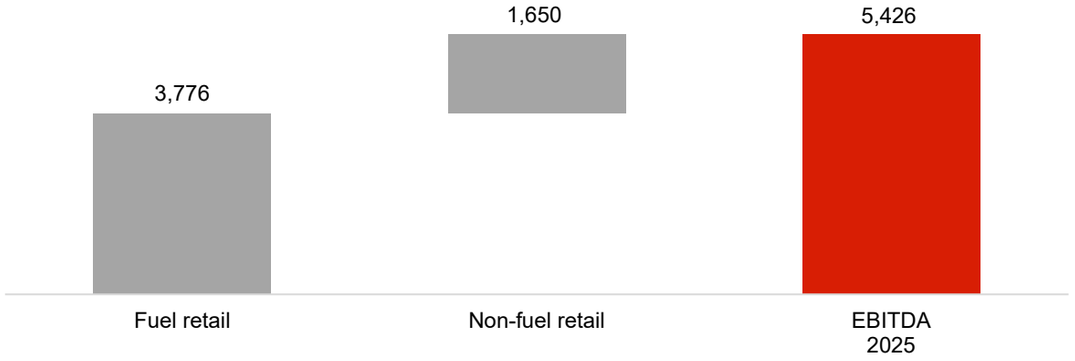



## Financial results

Table 21 Financial highlights of the Consumers & Products segments

| [PLN million] | 2025 | 2024 | change |
|---|---|---|---|
| Segment revenue, including: | 91,993 | 102,289 | (10,296) |
| Revenue from external customers | 89,210 | 99,339 | (10,129) |
| Inter-segment revenue | 2,783 | 2,950 | (167) |
| Segment costs | (87,427) | (100,184) | 12,757 |
| Other operating income | 584 | 259 | 325 |
| Net other operating income/(expenses) | (1,333) | (516) | (817) |
| (Impairment loss)/ reversal of impairment loss on trade and other receivables | (213) | (237) | 24 |
| **LIFO-based EBITDA excluding impairment losses** | **5,426** | **3,080** | 2,346 |
| LIFO-based EBITDA | 4,904 | 2,877 | 2,027 |
| EBITDA | 4,904 | 2,877 | 2,027 |
| Operating profit (EBIT) | 3,604 | 1,611 | 1,993 |
| Capex | 1,820 | 2,195 | (375) |

Chart 24 LIFO-based EBITDA by business line [PLN million]



Fuel retail PLN 3.8 billion [up PLN 0.5 billion]
(+) profitability maintained across all markets
(+) higher non-fuel margins across all markets
(-) higher service station operating costs

Non-fuel retail PLN 1.7 billion [up PLN 1.8 billion ]
(+) higher margins on gas and electricity sales
(+) higher gas and electricity sales volumes
(+) positive effect of the 2024 PPA settlement

Table 22 Consumers & Products sales by product [PLN million, thousand tonnes]

| | 2025 | 2024 | 2025 | 2024 |
|---|---|---|---|---|
| | PLN million | PLN million | thousand tonnes | thousand tonnes |
| Gasolines | 19,342 | 21,499 | 4,249 | 4,147 |
| Diesel oil | 26,347 | 31,204 | 6,370 | 6 585 |
| LPG | 1,679 | 1,780 | 421 | 441 |
| Other | 9,142 | 6,681 | 151 | 135 |
| **Fuel retail** | **56,511** | **61,164** | **11,191** | **11,308** |

The 1% year-on-year decline in fuel sales was driven mainly by the wholesale business (down 32% year on year) at the companies operating in Germany and Austria. Sales at service stations remained stable (up 0.1%).

Table 23 Sales of the Consumers & Products segment (retail sale of electricity and gas) by product [TWh]

| | 2025 | 2024 |
|---|---|---|
| Natural gas | 100 | 96 |
| Electricity | 16.9 | 16.4 |

Table 24 Sales of fuels by country [thousand tonnes]

| | 2025 | 2024 | Change |
|---|---|---|---|
| **Total** | **11,191** | **11,308** | **-1%** |
| Poland | 6,544 | 6,625 | -1% |
| Germany | 2,266 | 2,231 | 2% |
| Czech Republic* | 1,602 | 1,482 | 8% |
| Austria | 712 | 901 | -21% |
| Lithuania | 67 | 69 | -3% |

* Czech Republic includes operations in Slovakia and Hungary.

## Fuel retail operations

Table 25 Number of service stations, non-fuel retail outlets and alternative fuel stations at year-end 2025

| Country | Service stations | Non-fuel retail outlets | Alternative fuel stations |
|---|---|---|---|
| **Total** | **3,546** | **2,787** | **1,002** |
| Poland | 1,964 | 1,924 | 632 |
| Germany | 605 | 294 | 125 |
| Czech Republic | 446 | 363 | 154 |
| Austria | 263 | 31 | 67 |
| Hungary | 139 | 87 | 6 |
| Slovakia | 99 | 58 | 0 |
| Lithuania | 30 | 30 | 18 |

### Poland

In Poland, our service station network operates under the ORLEN brand in the premium segment and the Bliska brand in the economy segment. In 2025, we maintained our leading position in the Polish retail market, operating 1,964 service stations, up by 23 year on year.

The Stop Cafe 2.0 foodservice concept was rolled out at a further 100 stations, and by the end of 2025 was available at 1,425 ORLEN sites. Including all foodservice formats (Stop Cafe, Stop Cafe Bistro and Stop Cafe 2.0), our network had 1,924 stations with a foodservice offering.

In 2025, gross margin on non-fuel products and services increased across all business areas: foodservice, convenience stores and car wash operations. The highest increase of 35% year on year was achieved on restaurant meals offered at motorway service areas.

In 2025, the number of active users of our ORLEN VITAY mobile app reached a record 4.7 million, while the number of transactions made with the app exceeded 12 million per month. We continued to develop the app, which included the launch of the ORLEN Charge module enabling users to manage electric vehicle charging at ORLEN stations. In addition, the ORLEN ID system was introduced, providing access to the ORLEN Group's digital products and services through a single login and password.

In 2025, a new mobile app was launched for customers in the Hungarian market. Visually consistent with its Polish counterpart, the app was adapted to local needs and, thanks to its microservices architecture, can be easily deployed in other markets.

We also continued to develop advanced analytics, particularly in the area of managing personalised communication with VITAY scheme customers. Customers enrolled in the VITAY loyalty scheme generated 34% higher average monthly non-fuel margins in 2025 compared to non-members. The VITAY loyalty scheme was rolled out at other ORLEN Group companies, enabling customers of ENERGA Obrót and myORLEN sp. z o.o. (formerly PGNiG OD) to collect points for selected activities, such as granting marketing consents or activating e-invoicing.

### Germany

In Germany, ORLEN Deutschland operates economy service stations under the STAR brand and premium stations under the ORLEN brand. As at the end of 2025, ORLEN Deutschland's network comprised 605 service stations. The Stop Café and Star Connect foodservice concepts were introduced at a further 48 stations, bringing the total number of locations offering these formats to 294. The stations' turnover increased by 12% year on year.

The number of electric vehicle charging points increased to 176. Construction also began on the first e-mobility hub in Elmshorn, where the company is headquartered.

### Czech Republic

In the Czech Republic, our service stations are branded as ORLEN. As at the end of 2025, our network comprised 446 stations, including 8 new self-service ORLEN Express sites. 2025 was the best year ever for our Czech retail business in terms of fuel sales: they increased by 5% year on year to the highest level in our history. The roll-out of Stop Cafe 2.0 continued, with further 9 stations upgraded to this format.

During the past year we also reported record-high results in non-fuel sales, which rose 7%.

### Other markets

In Slovakia, the number of stations operating under the ORLEN brand reached 99 as at the end of 2025, after the network was expanded by the addition of two new sites. Retail fuel sales on this market increased by 10% year on year. In 2025, we continued investments in upgrades and development projects in Slovakia. This included rolling out the Stop Cafe 2.0 format to additional locations, bringing the total to 32 stations in this format by year's end.

In Hungary, at the end of the year the ORLEN-branded network comprised 139 service stations, 41 of which operated in the Stop Cafe 2.0 format.

At the end of 2025, ORLEN Austria managed a network of 263 stations under the Turmöl brand. The network is positioned in the economy segment and includes 67 sites offering the SPAR retail concept and electric vehicle charging points.

At the end of 2025, we had 30 service stations in Lithuania, all of them offering the Stop Cafe concept.

## Non-fuel retail operations

### Gas and energy retail

The ORLEN Group is active in the retail gas trading market through myORLEN (formerly PGNiG Obrót Detaliczny). whose business includes mainly the retail sale of natural gas and the provision of customer service to retail customers. myORLEN specialises in the sale of natural gas sourced on the Polish Power Exchange (POLPX) and under a bilateral contract with ORLEN, as well as compressed natural gas (CNG) and liquefied natural gas (LNG).

In 2025, the company continued to expand its portfolio of energy products and ancillary services, with a view to enhancing competitiveness and building a comprehensive offer for business and individual customers. This included the sale of electricity, the development of value-added services and ancillary products, the *Pomocna Ekipa* (Handyman Squad) 24/7 handyman service, the *Pakiet na zdrowie* medical services package, heating appliances, renewable energy sales programmes, energy audits and white certificates, ORLEN fleet products, and a multi-product account. These efforts confirm myORLEN's strategic direction towards becoming a provider of end-to-end energy solutions and related services that respond to market needs and regulatory changes.

The key projects implemented in 2025 included strengthening digital channels and further digitalising customer service, as well as developing online sales and digital products.

As at the end of 2025, myORLEN had a customer base of over 7 million retail customers, i.e. households purchasing high-methane gas. The company also served more than 250 thousand business customers, nearly 60% of whom were not subject to tariff regulations. In 2025, myORLEN acquired over 137 thousand new customers.

Customer service was provided directly through 128 Customer Service Offices, remotely (by phone, chat, email, eBOK and mBOK platforms, text messages and correspondence), as well as through AI-based solutions, namely a chatbot (website, eBOK and mBOK platforms) and a voicebot (helpline). In 2025, the company handled a total of 21.9 million interactions through these channels, of which eBOK/mBOK accounted for the largest share (72.7%), followed by the helpline (15%). At the end of 2025, the number of active eBOK platform users exceeded 4 million.

In 2025, we launched electricity sales to business customers, marking an important step in diversifying our product offering and building market position in the segment of comprehensive energy services for businesses.

In the LNG segment, key customers in 2025 were large industrial companies using regasification facilities in areas without access to the gas network or where existing connection capacity was insufficient for their operations. Other customers included transport companies using LNG for heavy-duty road transport. Over the 12 months of 2025, customers collected more than 652 thousand MWh of LNG, and 11 LNG sales contract were entered into with businesses.

In the CNG segment, gas was sold through 39 public refuelling stations (including 2 L-CNG stations offering both CNG and LNG) as well as 2 on-site stations dedicated to specific customers. The largest consumers of CNG are urban transport providers and waste management companies. Fuel sales at CNG stations exceeded 322 thousand MWh.

Other activities of the Consumers and Products segment

At the end of 2025, we operated the ORLEN Charge network comprising 1,291 electric vehicle charging points in Poland. During the year, modern multi-bay fast-charging stations were commissioned, featuring eight charging bays and based on the dynamic power-sharing technology, with charging capacity of up to 400 kW per point.

The new stations allow eight vehicles to be charged simultaneously, with peak output per bay of 200 kW even at full occupancy. The smart dynamic power-sharing system automatically allocates energy between vehicles, reducing charging times and supporting even the most demanding electric vehicle models.

In parallel, we rolled out the network of standalone stations, where two vehicles can be charged at the same time at up to 200 kW, using the same technology. In 2025, the volume of electricity sold via ORLEN Charge chargers in Poland increased by more than 70% year on year.

Electric vehicle charging infrastructure was also expanded by other Group companies. ORLEN Austria operated 119 charging points, while ORLEN Deutschland had 176 charging points.

## 4.5 Research, development and innovation activities

At the ORLEN Group, innovation supports effective delivery of our business strategy by driving the development and deployment of new technologies and solutions that strengthen the Group's competitive position in a changing market environment. In 2025, we completed more than 150 R&D&I projects, with total spending on research and development and pilot innovation projects amounting to approximately PLN 75 million.

Our research, development and innovation activities are organised around 12 Technology Domains:

- in the Upstream & Supply segment – Modern Upstream;
- in the Downstream segment – Efficient Refining Production, Advanced Petrochemical Production and New Generation Materials, Hydrogen Technologies, Biofuels, Biochemicals, and Fertiliser Business Development;
- in the Energy segment – Clean Energy Generation and Energy Storage;
- in the Consumers & Products segment – Modern Customer Service and Service Station of the Future;
- the Recycling (Circular Economy) and Emission Reduction Pathways domains, supporting the objectives set for the Downstream, Energy and Upstream & Supply segments.

To foster innovation and increase the Group's involvement in developing and testing new technologies, we are building an organisational culture that embraces innovation and putting in place a comprehensive innovation ecosystem. It currently includes:

- the Research and Development Centre in Płock – development of proprietary technologies; pilot plant and R&D projects;
- a science collaboration platform – joint R&D projects with more than 20 universities and research institutes;
- start-up acceleration programmes – ORLEN Skylight and participation in the Startup Booster Poland initiative financed under the FENG programme;
- the ORLEN VC Fund – a corporate venture capital fund investing in minority interests in start-ups and other VC funds;
- other initiatives, including the H2 Academy, Neon grant programme (run jointly with the National Centre for Research and Development), and the Next Catalysis Consortium;
- technology partnerships with leading technology companies, including Google Cloud and Microsoft, focused on digitalising production processes and implementing AI solutions.

In 2025, we continued to expand the research capabilities of our R&D Centre in Płock. The Centre operates pilot plants that replicate key refining and petrochemical processes, enabling research into production process optimisation, fuel testing and development of new petrochemical products.

Its research infrastructure also includes advanced laboratories where teams work on new oil and lubricant formulations, as well as new types of road bitumen.

### Key R&D projects in 2025

In the Upstream & Supply segment, we continued work on a methodology for processing data acquired using Distributed Acoustic Sensing technology to process fibre-optic measurements recorded in wellbores, an innovative method for high-resolution seabed surveying, and implementation of an optical borehole televiewer as an innovative wellbore imaging system.

Activities in the Downstream segment focused on developing proprietary catalyst technologies for industrial processes. In cooperation with leading Polish scientific institutions, we carried out research to develop innovative catalytic materials aligned with the technological needs of ORLEN's production facilities. Deployment of the catalysts is expected to improve process efficiency and, as a result, bring down production costs.

We also continued R&D projects aimed at reducing the carbon intensity of our production processes. Key initiatives related to proprietary technologies included research into the potential use of methane pyrolysis and work on the development and scale-up of solid oxide cell (SOC) high-temperature electrolysis technology. In the future, deployment of these technologies will enable efficient production of green hydrogen for ORLEN's process needs.

At ORLEN Południe, R&D work continued on the development and scaling of the company's proprietary lactic acid production technology. Lactic acid is used in a wide range of industries, including in the production of biodegradable packaging made from polylactic acid.

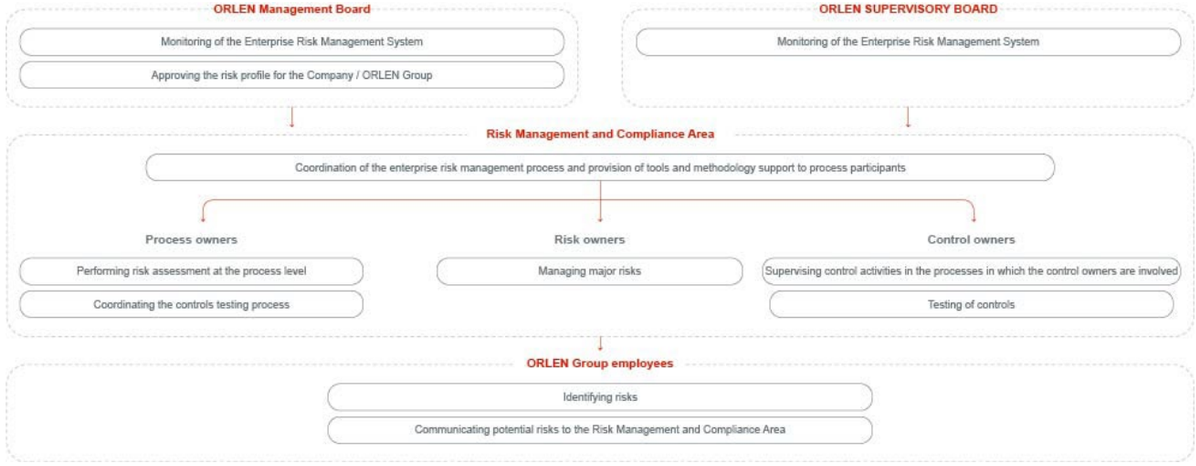
In the Energy segment, R&D work focused on the development of a mobile heat storage unit based on phase-change materials. The system is intended for the district heating market. Once the research work is completed, the company's offering will be expanded to include an advanced new device designed to supply energy for central heating and domestic hot water in multi-family and municipal buildings.

As part of our collaboration with emerging technology companies, in 2025 we joined the Startup Booster Poland programme and continued application rounds under our corporate acceleration programme, ORLEN Skylight. Acceleration programmes create opportunities to test and implement technological solutions aligned with the ORLEN Group's long-term development plans in areas including decarbonisation, digitalisation, operational efficiency, sustainability, the circular economy and power generation. In 2025, more than 100 technology challenges were defined as part of the ORLEN Group's acceleration programme calls. We worked with 15 start-ups in retail, refining production, logistics, water and wastewater management, marketing and power generation. Examples of our successful collaboration with start-ups include the deployment of a digital twin at the crude distillation unit at the Płock production plant, which significantly improved process efficiency, a project involving the use of fibre-optic technology to monitor and enhance the safety of logistics infrastructure, and the implementation of a system for predicting wind turbine productivity, enabling optimisation of maintenance processes.

## 4.6 Risk management

Based on the Enterprise Risk Management Policy and Procedure, we monitor and assess our risk exposures on an ongoing basis, taking mitigation measures to reduce the likelihood and impacts of identified risks. As required by those regulations, the Risk Management and Compliance Area has been established at ORLEN S.A. to coordinate the enterprise risk management process across all levels of the organisation. The Enterprise Risk Management (ERM) System is a tool that helps us successfully achieve our operational and strategic goals.

Figure 8 Key roles in the Enterprise Risk Management System



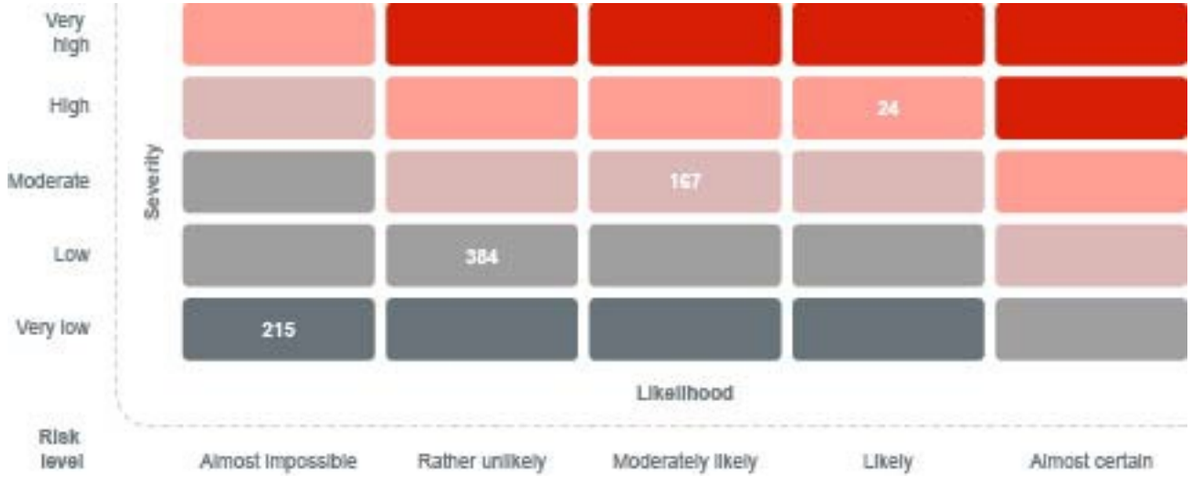

In 2025, the annual process of risk self-assessment and controls testing at ORLEN S.A. involved 790 risks. Risks are assessed on a gross and net basis. Gross risk assessment reflects exposure to a risk by measuring its potential impact without taking into account the effectiveness of controls. The group of risks with the highest gross rating represents the key risks for ORLEN S.A. Their materialisation could have a significant financial impact on our day-to-day. The profile of ORLEN S.A.'s key risks is

aligned with the global perception of the most significant current threats, as identified in *The Global Risks Report 2026* published by the World Economic Forum. These threats span the political and economic sphere (geoeconomic confrontation, armed conflicts and economic downturns), security (misinformation and disinformation, cyber security and disruption of critical infrastructure), access to resources (concentration of strategic resources and supply chain disruptions), and climate impacts (extreme weather events). They are reflected in the key risks identified in selected areas and processes of ORLEN S.A.'s operations, in particular in the following categories:

- In Upstream, risks arise from the uncertainty of exploration and production processes and include risks related to potential deviations from forecast reserves and production levels, geological and technical issues, protracted licensing procedures, and the impact of natural hazards.
- Risks identified in relation to our business strategy objectives are related to the dynamic market and macroeconomic environment, in particular competition, geopolitical developments, demand fluctuations and price volatility, adverse regulatory changes, and operational risks affecting the delivery of development projects.
- In the area of security, potential sources of risk are business continuity disruptions, industrial accidents and failures, crisis situations, OHS and fire protection hazards, as well as environmental impacts of our operations.
- In gas trading, risks are identified in connection with ensuring continuity of supply, market price volatility of energy products, the financial standing of trading partners, and operational risks that may affect the quality and continuity of customer service.
- In corporate management processes, risks arise from regulatory requirements and licensing conditions, as well as from the management of public and international relations and communication processes. These risks may affect our compliance, reputation, and relationships with key stakeholders.

Gross risk exposure indicates that ORLEN should continue to develop and strengthen controls to reduce the likelihood and/or impact of these risks materialising. In 2025, 1,646 controls were tested for the 790 managed risks across 213 business processes. The test results confirmed that the vast majority of the controls operate as intended and effectively support the mitigation of identified risks. Net risk assessment takes into account the effectiveness of the measures and controls in place that affect the level of risk impact and/or likelihood.

Figure 9 Net risk exposure – quantitative distribution of risks




When the effectiveness of controls is taken into account, ORLEN's overall risk exposure across its processes and strategic objectives is significantly reduced. Exposure to high and very high risks falls to 24 cases, while exposure to medium risks declines to 167 cases. Notably, exposure to low and very low risks totals 599 cases, demonstrating effective management of the identified risks.

Limited control effectiveness in relation to the highest risks stems from the external nature of their drivers. Factors involving a higher a degree of uncertainty include, in particular, regulatory changes, the acquisition of title to real estate, geological conditions, and volatility in the geopolitical and market environment. Regardless of the complexity of the risks to which we are exposed, we seek to implement optimal solutions to monitor and prevent their materialisation.

For a detailed description of the individual risks, including energy transition risks, see Section 6 of this Report and Section 14.2 of the consolidated financial statements.

# 5. Financial position of the ORLEN Group and ORLEN S.A.

Table 26 Selected items of the ORLEN Group's consolidated financial statements [PLN million]

| | 2025 | 2024 | change |
|---|---|---|---|
| Revenue | 267,827 | 294,886 | (27,059) |
| Cost of sales | (220,205) | (252,398) | 32,193 |
| LIFO-based EBITDA before impairment losses | 25,253 | 23,992 | 1,261 |
| EBITDA | 24,200 | 23,721 | 479 |
| Operating profit | 9,957 | 9,707 | 250 |
| Profit before tax | 9,013 | 9,303 | (290) |
| Net profit | 2,648 | 2,747 | (99) |
| Net cash provided by operating activities | 47,220 | 36,634 | 10,586 |
| Net cash provided by (used in) investing activities | (30,717) | (34,051) | 3,334 |
| Net cash provided by (used in) financing activities | (1,181) | (4,761) | 3,580 |
| Net increase/(decrease) in cash | 15,322 | (2,178) | 17,500 |
| Total assets | 265,048 | 255,395 | 9,653 |
| Non-current assets | 184,707 | 187,104 | (2,397) |
| Current assets, including: | 80,341 | 68,291 | 12,050 |
| Inventories | 19,126 | 26,411 | (7,285) |
| Total liabilities and equity | 265,048 | 255,395 | 9,653 |
| Total equity | 144,543 | 146,750 | (2,207) |
| Total non-current liabilities | 60,333 | 48,324 | 12,009 |
| Toal current liabilities | 60,172 | 60,321 | (149) |
| Total liabilities | 120,505 | 108,645 | 11,860 |

We did not publish any forecasts of the ORLEN Group's financial performance for 2025, including forecast figures for the consolidated statement of profit or loss and other comprehensive income, consolidated statement of financial position, or consolidated statement of cash flows. For information regarding the basis of preparation of the full-year consolidated financial statements and adjusted items, see the consolidated financial statements of the ORLEN Group for 2025.

As at 31 December 2025, based on updated macroeconomic assumptions, we identified indicators of impairment requiring impairment testing under IAS 36 *Impairment of assets*. This assessment took into account measures and initiatives set out in our ORLEN 2035 strategy, and included a review of key projects in the Downstream segment, notably the New Chemistry project, the hydrocracking unit project at ORLEN Lietuva, the restructuring of Spolana, and an updated assessment of market conditions in the PVC sector. For the full methodology applied in impairment testing and details of the impairment losses recognised, see Section 12.6 to the consolidated financial statements for 2025.

## 5.1 Discussion of the consolidated statement of profit or loss

### Revenue

The ORLEN Group's revenue for 2025 amounted to PLN 267,827 million, a decrease of PLN 27,059 million year on year. Poland accounted for 64% of the total. The other markets generating the highest revenue were Germany, with PLN 24,014 million, the Czech Republic, with PLN 17,118 million, and the Baltic states (Lithuania, Latvia and Estonia), with PLN 12,214 million. Revenue from the Austrian market was PLN 4,246 million. Other revenue, totalling PLN 37,253 million, comprised primarily sales to customers in the Netherlands, Ukraine, Switzerland, the United Kingdom, Hungary, Slovakia and Ireland.

As we operate in the area of natural resources and products derived from their processing, our revenue depends to a significant extent on global prices of relevant commodities and products. Another factor influencing the revenue level was production and sales volumes, which remained high across all of the Group's business segments during the period under review.

In 2025 and 2024, we did not identify any major customer accounting individually for more than 10% of the ORLEN Group's total revenue.

In 2025, more than 10% of the Group's total revenue was generated from transactions executed on the Polish Power Exchange and cleared by the Commodity Clearing House (IRGiT).

Table 27 Revenue by segment

| Segment | 2025 share (%) | 2024 share (%) |
|---|---|---|
| Upstream & Supply | 20.1% | 20.1% |
| Downstream | 36.1% | 37.0% |
| Energy | 10.4% | 9.1% |
| Consumers & Products | 33.3% | 33.7% |
| Corporate Functions | 0.1% | 0.1% |
| **TOTAL** | **100.0%** | **100.0%** |

## Upstream and Supply

- Gas sales volumes increased by 55 TWh year on year to 281 TWh in 2025.
- Gas volumes traded on the Polish Power Exchange were up by 26 TWh year on year, reflecting a recovery in demand from the industrial sector following the sharp commodity price increases triggered by the war in Ukraine.
- Gas demand from other domestic customers increased by 8 TWh year on year following the commissioning of new gas-fired power generating units.
- Gas trading volumes on international markets grew by 28 TWh year on year, supported by favourable spreads.
- Hydrocarbon sales volumes declined by nearly 5 million boe year on year, mainly in Norway.

## Downstream

- Petrochemical sales volumes declined by 671 thousand tonnes year on year, while sales of refining products increased by 341 thousand tonnes.
- Fuel sales rose year on year, with gasoline up by 161 thousand tonnes, diesel up by 241 thousand tonnes, and jet fuel up by 158 thousand tonnes.
- Sales of heavy fractions fell by 358 thousand tonnes year on year; as these products were sold at a negative margin, this had a positive financial effect.
- The sales mix improved as a result of the commissioning of the visbreaking and HOG units at ORLEN S.A., which increased yields of high-margin fractions.
- Fertiliser sales declined by 144 thousand tonnes year on year due to production unit shutdowns in the Czech Republic and the power outage at Włocławek in March 2025.
- PTA volumes fell by 167 thousand tonnes year on year and PVC volumes by 58 thousand tonnes year on year due to plant shutdowns.
- Polyolefin sales declined by 124 thousand tonnes year on year and olefin sales by 78 thousand tonnes year on year, reflecting adverse market conditions, including growing competition from lower-priced imports.

## Energy

- Dispatch of the Ostrołęka power plant by PSE increased by 0.5 TWh year on year.
- The fuel mix at ORLEN S.A.'s power generating assets changed, driven by more favourable natural gas prices in 2025 relative to fuel gas.
- Heat demand increased by 2.6 PJ year on year due to lower average temperatures.
- Electricity distribution volumes increased by 0.4 TWh year on year; grid losses declined, and the new renewable energy assets at ORLEN New Power: Neo Solar Farms, Neo Solar Chotków, FW Warta wind farm and PV Wałcz solar PV farm, were fully utilised in 2025.

## Consumer and Products

- Gas and electricity sales increased by 4% year on year to 117 TWh, driven by colder weather compared with the year before.
- Motor fuel sales in the Czech market rose by 8% year on year, supported by the expansion of our offering for business customers.

## Corporate Functions

- Revenue declined by PLN 42 million year on year.

For detailed information regarding changes in sales volumes by segment, see Section 4 of this Report.

## Operating expenses

Table 28 ORLEN Group's operating expenses [PLN million]

| | 2025 | 2024 | structure 2025 | structure 2024 |
|---|---|---|---|---|
| Raw materials and consumables used | (82,965) | (108,622) | 34.3% | 39.7% |
| Cost of gas | (55,214) | (56,419) | 22.8% | 20.7% |
| Cost of goods held for resale and materials sold | (42 784) | (36,968) | 17.7% | 13.5% |
| Services | (18,220) | (17,684) | 7.5% | 6.5% |
| Employee benefits | (14,208) | (13,149) | 5.9% | 4.8% |
| Depreciation and amortisation | (14,243) | (14,014) | 5.9% | 5.1% |
| Taxes and charges, including: | (11,969) | (26,789) | 4.9% | 9.7% |
| *contribution to the Price Difference Compensation Fund* | *-* | *(15,417)* | *0.0%* | *5.6%* |
| Other | (2,214) | 447 | 1.0% | 0.0% |
| **Operating expenses** | **(241,817)** | **(273,198)** | | |
| Selling expenses | (14,829) | (14,677) | | |
| General and administrative expenses | (6,783) | (6,123) | | |
| **Cost of sales** | **(220,205)** | **(252,398)** | | |

In 2025, total operating expenses decreased by PLN 31,381 million year on year, to PLN -241,817 million.

The cost of raw materials and consumables used fell by PLN 25,657 million year on year, driven mainly by a USD 12/bbl year-on-year decline in crude oil prices and an appreciation of the Polish złoty against the US dollar by PLN 0.22.

Cost of gas was down by PLN 1,205 million year on year, chiefly as a result of lower gas consumption in technological processes as a result of production unit shutdowns. Unit prices of gas used for power generation at the CCGT plants also declined. Contracts for 2024 had been concluded in late 2023 in a high gas price environment, whereas contracting for 2025 took place under more stable market conditions.

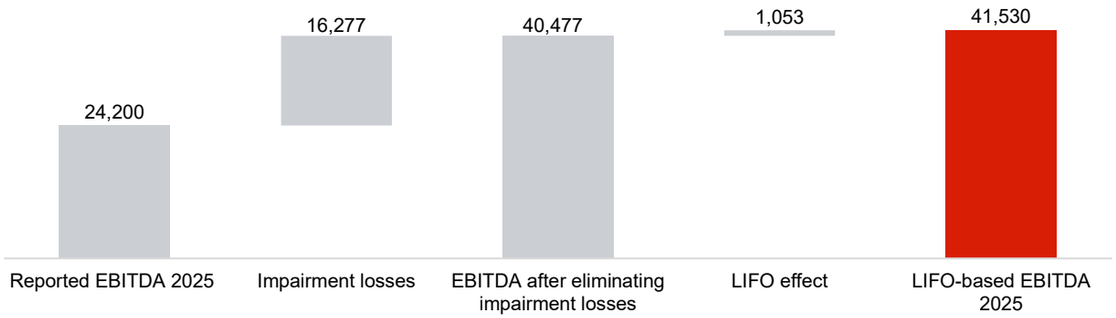
The cost of goods for resale and materials sold rose by PLN 5,816 million year on year, reflecting an increase in volumes of goods purchased to perform commercial contracts as a result of lower availability of internally-manufactured products.

The cost of employee benefits rose by PLN 1,059 million year on year, driven by the need to maintain competitive pay levels in key operating segments and to implement pay rises agreed with employee organisations.

Taxes and charges were lower by PLN 14,820 million year on year, mainly due to the absence in 2025 of the effect of the PLN 15,417 million contribution to the Price Difference Compensation Fund recognised in 2024. At the same time, $CO_2$ emission costs rose by PLN 915 million year on year, mainly due to a 13% increase in emission allowance prices.

### LIFO-based EBITDA before impairment losses on non-current assets

Chart 25 EBITDA and LIFO-based EBITDA* after eliminating impairment losses [PLN million]

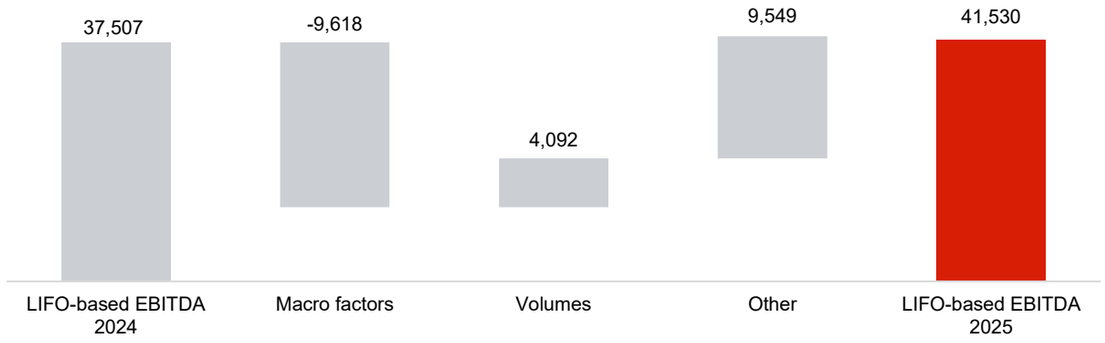



* The ORLEN Group measures its inventories in financial statements in accordance with the International Financial Reporting Standards (IFRS), at weighted average cost.

- The Group's EBITDA in 2025 came in at PLN 24,200 million.
- The net effect of impairment losses on property, plant and equipment and intangible assets in 2025 was negative at PLN -16,277 million.
- The effect of oil price movements on inventory measurement reflected in EBITDA was PLN -1,053 million.

- As a result, for 2025 the ORLEN Group recorded LIFO-based EBITDA excluding impairment losses on non-current assets of PLN 41,530 million, up PLN 4,023 million year on year. Wynik EBITDA Grupy ORLEN w 2025 roku wyniósł 24 259 mln PLN.

Chart 26 Drivers of LIFO-based EBITDA evolution year on year [PLN million]




## Macroeconomic factors

- year-on-year decline of PLN -9,390 million in margins on sales of high-methane gas in the Upstream & Supply segment
- negative effect of the settlement of hedging transactions, foreign exchange rates, and higher $CO_2$ emission costs driven by higher allowance prices, totalling PLN -5,732 million year on year
- positive changes in margins and oil price differentials on processed crudes in the Downstream segment, amounting to PLN 3,082 million year on year
- year-on-year improvement of PLN 1,400 million in margins on gas sales to tariff customers in the Consumers & Products segment
- year-on-year increase in margins, with margins on distribution services in the Energy segment up by PLN 656 million and margins on electricity sales up by PLN 465 million as a result of lower natural gas and coal prices in the conventional power generation business

## Volumes

- increase in gas sales volumes in the Upstream & Supply segment, driven by recovering demand from the industrial sector following the rise in commodity prices caused by the conflict in Ukraine
- higher gas and electricity sales in the Consumers & Products segment, resulting from lower average temperatures year on year
- improvement in the sales mix in the Downstream and Consumers & Products segments, partly due to lower sales of heavy fractions
- higher heat demand in connection with lower average temperatures; increased utilisation of the Ostrołęka power plant, and higher electricity distribution volumes

## Other

- PLN 15,417 million year on year – absence in 2025 of the negative effect of the contribution to the Price Difference Compensation Fund recognised in 2024
- PLN -1,785 million year on year – effect of accounting for the assets and liabilities of the former PGNiG Group as at the merger date
- PLN -818 million year on year – effect of using higher-cost inventory layers (mainly crude oil and refining products)
- PLN -715 million year on year – reduced resale of electricity (trading activities) in the Energy segment due to the maintenance shutdown of the Włocławek CCGT plant
- PLN -704 million year on year – negative effect of remeasuring inventories to net realisable value, reflecting market price declines for crude oil and products
- PLN -1,846 million year on year – other factors, including mainly higher overheads and labour costs, as well as increased logistics and upstream infrastructure costs in International Assets, and lower margins on gas sales in the Upstream & Supply segment (in 2025, counterparties exercised the option to switch from index-linked prices to fixed prices). These effects were partly offset by higher sales margins in the Downstream segment, higher fuel and non-fuel margins in the Consumers & Products segment, higher margins on gas distribution services, as well as a positive effect of foreign exchange differences and interest on trade receivables, income from interest accrued on overpayments for gas supplies (resulting from the favourable arbitration court ruling on ORLEN S.A.'s claim against Gazprom), and the absence of the negative effect of the restructuring provision for Spolana recognised in 2024. Net other operating income/expenses reflected the negative effect of provisions for potential liabilities to Gazprom arising from the settlement of the Yamal Contract price, as well as the absence of insurance compensation

received in 2024 in connection with failures of the vacuum residue hydrodesulphurisation and hydrocracking units.

### Net finance income/(costs) and net profit/(loss)

Net finance costs for the period amounted to PLN 1,469 million, and included a loss on exercise and/or measurement of derivative instruments of PLN 277 million, net foreign exchange gain of PLN 152 million, and net other interest expense (including lease expense) of PLN -971 million.

ORLEN Group's net profit for the 12 months ended 31 December 2025 totalled PLN 2,648 million after tax of PLN 6,365 million, which means an decrease of PLN 99 million year on year.

For detailed information on finance income and finance costs (Section 11.5) and income tax (Section 11.8), see the consolidated financial statements for 2025.

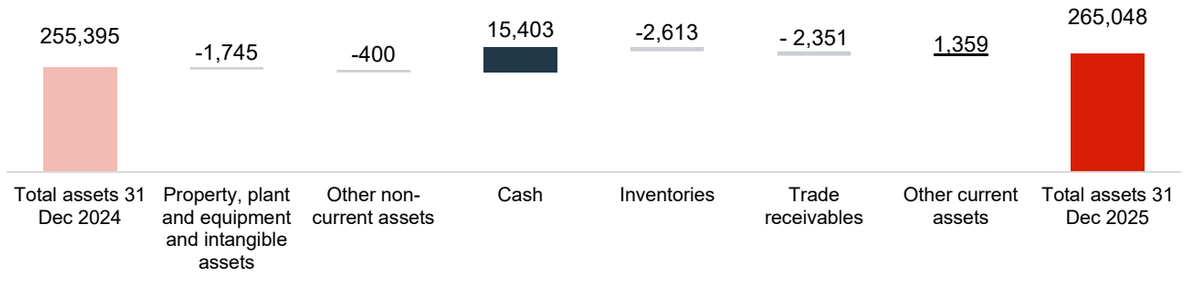
## 5.2 Discussion of the consolidated statement of financial position

For the complete consolidated statement of financial position, see the consolidated financial statements of the ORLEN Group for 2025.

As at 31 December 2025, the ORLEN Group’s total assets and total liabilities stood at PLN 265,048 million, up PLN 9,653 million (3.8%) compared with 31 December 2024.

### Assets

Chart 27 Changes in selected items of consolidated assets [PLN million]

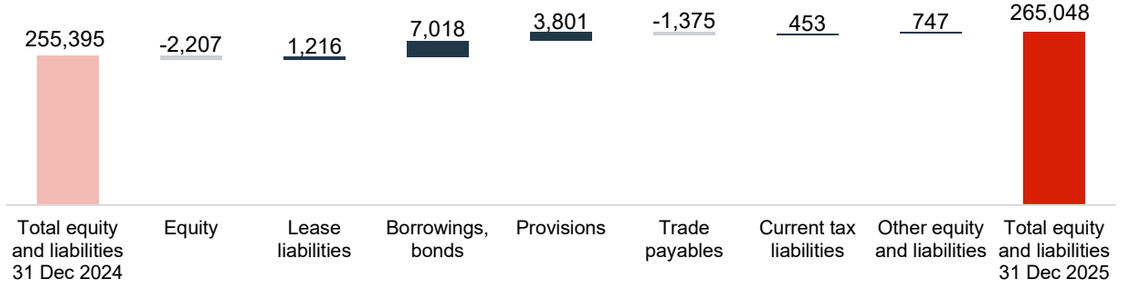



Property, plant and equipment represent the largest item within the ORLEN Group’s assets, amounting to PLN 142,380 million as at 31 December 2025. The year-on-year increase of PLN 741 million (0.5%) primarily reflected the execution of growth projects by the ORLEN Group.

The ORLEN Group’s current assets as at 31 December 2025 amounted to PLN 80,341 million, and were higher by PLN 11,798 million (17.2% year on year) relative to 31 December 2024. The largest increase was recorded in cash, which grew to PLN 26,445 million as at the end of 2025.

### Equity and liabilities

Chart 28 Changes in selected items of consolidated equity and liabilities [PLN million]




As at the end of 2025, equity, which is the primary source of financing for the ORLEN Group’s assets, stood at PLN 144,543 million. It fell by PLN 2,207 million (1.5%) relative to the end of 2024, mainly as a result of a decrease in retained earnings, amounting to PLN 92,597 million as at the end of 2025.

Non-current liabilities were PLN 60,333 million as at the end of 2025, up by PLN 12,009 million, or 25.0% year on year. The increase was chiefly attributable to higher liabilities under bond issues, up by PLN 8,878 million year on year.

As at 31 December 2025, the ORLEN Group’s current liabilities stood at PLN 60,172 million, representing a decrease of PLN 149 million year on year. The key reason for this decrease was a year-on-year decline of PLN 842 million in short-term borrowings, and a lower amount of liabilities under short-term bonds, which went down by PLN 840 million year on year.

## 5.3 Discussion of the consolidated statement of cash flows

For the complete consolidated statement of cash flows, see the consolidated financial statements of the ORLEN Group for 2025.

Table 29 Consolidated statement of cash flows [PLN million]

| | 2025 | 2024 | change |
|---|---|---|---|
| **Net cash provided by operating activities**, including: | **47,220** | **36,634** | 10,586 |
| Change in working capital | 2,748 | 7,064 | (4,316) |
| **Net cash (used in) investing activities** | **(30,717)** | **(34,051)** | 3,334 |
| **Net cash (used in) financing activities** | **(1,181)** | **(4,761)** | 3,580 |
| **Net increase/(decrease) in cash and cash equivalents** | **15,322** | **(2,178)** | 17,500 |
| Effect of exchange rate changes on cash and cash equivalents | 81 | (62) | 143 |
| Cash and cash equivalents at beginning of period | 11,042 | 13,282 | (2,240) |
| Cash and cash equivalents at end of period | 26,445 | 11,042 | 15,403 |

Net cash provided by operating activities in the 12 months ended 31 December 2025 amounted to PLN 47,220 million, up by PLN 10,586 million compared with 2024, mainly due to an increase in the amount of other adjustments: derivatives were higher by PLN 5,461 million year on year and mandatory reserves were higher by PLN 2,312 million year on year. Income tax paid during the 12 months ended 31 December 2025 totalled PLN 5,428 million.

Net cash used in investing activities in 2025 stood at PLN -30,717 million, primarily reflecting net expenditures of PLN -26,931 million on acquisitions and disposals of property, plant and equipment, intangible assets and right-of-use assets, as well as PLN -877 million expenditures on transactions involving the acquisition of control in subsidiaries.

Net cash used in financing activities in 2025 was PLN -1,181 million, and included chiefly dividends paid to ORLEN shareholders of PLN -6,967 million (PLN 6.00 per share), and net proceeds from borrowings of PLN -1,197 million, partly offset by proceeds from government grants of PLN 1,552 million.

Ater accounting for the effect of exchange differences, cash and cash increased by PLN 15,322 million in 2025, and stood at PLN 26,445 million as at 31 December 2025.

## 5.4 Key financial metrics

Table 30 ORLEN Group's liquidity, turnover, profitability and debt metrics in 2024–2025

| | | 2025 | 2024 |
|---|---|---|---|
| **Liquidity ratios, including:** | | | |
| Current ratio | | 1.3 | 1.1 |
| Quick ratio | | 1.0 | 0.8 |
| **Turnover ratios, including:** | | | |
| Average collection period | days | 34 | 37 |
| Average payment period | days | 32 | 29 |
| Inventory turnover period | days | 28 | 28 |
| **Profitability ratios, including:** | | | |
| Return on assets (ROA) | % | 1.0 | 1.1 |
| Return on equity (ROE) | % | 1.8 | 1.9 |
| Return on capital employed (ROACE) | % | 2.0 | 1.9 |
| LIFO-based return on average capital employed (LIFO-based ROACE) | % | 2.8 | 2.1 |
| Gross margin | % | 3.4 | 3.2 |
| Net margin | % | 1.0 | 0.9 |
| **Debt ratios, including:** | | | |
| Net debt | PLN million | -1,411 | 7,024 |
| Net debt / EBITDA | x | -0.06 | 0.30 |
| Net financial leverage | % | -1.0 | 4.8 |

## 5.5 Management of financial resources and liquidity at the ORLEN Group

### Liquidity management

The ORLEN Group uses cash pool systems to effectively manage current liquidity and optimise finance costs within the Group. As at 31 December 2025, there were three cash pool systems in operation, managed by ORLEN, covering a total of 114 Group companies. The Group's liquidity is monitored on an ongoing basis and managed centrally by ORLEN. In 2025, the level of cash was sufficient to settle liabilities on time. Surplus cash was invested primarily in bank deposits. Decisions regarding bank deposits are guided by the objective of maximising returns within predefined concentration limits per bank, and are based on ongoing assessments of each bank's financial condition. Deposits were placed exclusively with banks holding a short-term deposit rating at investment grade level.

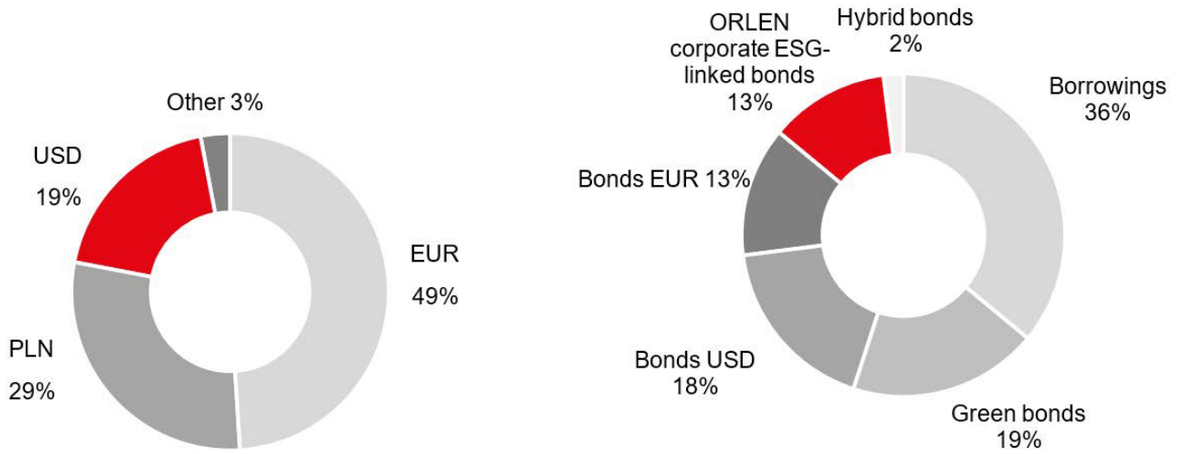
### Working capital management

The ORLEN Group flexibly manages working capital in a changing macroeconomic environment, using a range of tools to optimise its level. Working capital management is governed by established procedures and policies on trade credit and debt collection, including debt limits and collateral. As part of its trade credit approval process, the Group assesses the creditworthiness of its counterparties based on financial analysis and/or current credit agency reports, as well as the counterparty's track record. It then sets credit limits and, where justified, establishes appropriate collateral arrangements. The Group is also able to offset mutual receivables and utilises reverse factoring arrangements. Additionally, the Group periodically reviews the financial standing of its counterparties, including credit limit levels. Net working capital as at 31 December 2025 amounted to PLN 24,634 million, representing a decrease of PLN 3,529 million compared with the end of 2024.

### Borrowings, bonds

In accordance with the objective set out in the ORLEN 2035 strategy, the ratio of consolidated net debt to EBITDA must not exceed 2.0 by 2030.

Chart 29 Gross debt structure and currency breakdown in 2025




The ORLEN Group engages banks with high credit ratings and strong market positions that also provide competitively priced banking services. This enables the Group to maintain a high standard of financing sources. In addition, the Group uses debt instruments with different characteristics, which further strengthens its liquidity position.

Table 31 Breakdown of funding sources (gross debt) [PLN million]

| | 2025 | 2024 | change |
|---|---|---|---|
| Bank borrowings | 8,359 | 9,870 | (1,511) |
| Non-bank borrowings | 661 | 170 | 491 |
| Bonds | 16,144 | 8,106 | 8,038 |
| **Financial debt*** | **25,164** | **18,146** | **7,018** |
| By maturity: | | | |
| Long-term | 23,657 | 14,979 | 8,678 |
| Short-term | 1,507 | 3,167 | (1,660) |

* Net of finance lease liabilities.

Table 32 Credit facility agreements of the ORLEN Group as at 31 December 2025 [above PLN 1 billion]

| Company/Group | Bank | Financing amount under the agreement*) | Year agreement signed | Final maturity date | Interest rate |
|---|---|---|---|---|---|
| ORLEN | Bank syndicate | PLN 10,000 million | 2019 | 2026 | variable rate + margin |
| ORLEN | Bank syndicate | EUR 2,000 million (PLN 8,453 million) | 2024 | 2029 | variable rate + margin |
| ORLEN | Bank Gospodarstwa Krajowego (BGK) | PLN 4,500 million | 2022 | 2027 | variable rate + margin |
| ORLEN | European Investment Bank | PLN 1,700 million | 2025 | 2040 | variable rate + margin |
| Grupa ENERGA | European Investment Bank | PLN 1,000 million | 2013 | 2031 | variable rate + margin |
| Grupa ENERGA | BGK (National Recovery and Resilience Plan) | PLN 9,378 million | 2025 | 2050 | fixed preferential rate |
| ORLEN Upstream Norway A.S. | Bank syndicate | USD 600 million (PLN 2,163 million) | 2022 | 2028 | variable rate + margin |

* Data converted into PLN at the exchange rate quoted by the National Bank of Poland for EUR/PLN, CZK/PLN, USD/PLN, CAD/PLN on 31 December 2025.

Table 33 Project finance credit facility agreements of the ORLEN Group as at 31 December 2025 [above PLN 1 billion]

| Company/Group | Bank | Financing amount under the agreement[1)] | Year agreement signed | Final maturity date | Interest rate |
|---|---|---|---|---|---|
| Baltic Power Sp. z o.o.[2)] | Bank syndicate | EUR 4,182 million (PLN 17,676 million) and PLN 1,032 million | 2023 | 2046 | variable rate + margin |
| ENERGA Group | Bank syndicate | PLN 2,640 million | 2023 | 2035 | variable rate + margin |

1) Amounts as per agreements.
2) ORLEN's interest: 51%.

As a general rule, the ORLEN Group did not provide security for its borrowings. The few exceptions included:

- financing obtained by ORLEN Upstream Norway A.S, which carries standard collateral arrangements typical of reserve-based lending (RBL);
- financing provided to Baltic Power Sp. z o.o. under a project finance facility, which includes collateral arrangements customary for this type of financing;
- financing provided to CCGT Ostrołęka Sp. z o.o. under a project finance facility, which includes collateral arrangements customary for this type of financing;

Following ORLEN's merger with PGNiG, the Group assumed a syndicated revolving credit facility of PLN 10,000 million. The facility is intended to finance the Group's ongoing operations. The agreement expires in June 2026. As at 31 December 2025, the facility remained undrawn.

In October 2024, ORLEN entered into a credit facility agreement with a consortium of 16 banks, providing the Group with financing of EUR 2,000 million. The term of the agreement is five years, with the option to extend it twice by one year (on a 5+1+1 basis). The facility is a dual-currency instrument, available in EUR and USD, intended to finance ongoing operations. As at 31 December 2025, the facility remained undrawn.

The ORLEN Group also used bilateral credit facilities under agreements with CaixaBank SA Branch in Poland, Bank Pekao S.A., Bank Handlowy w Warszawie SA, BGK, and PKO BP S.A. The facilities are primarily intended to finance the ORLEN Group's ongoing operations. As at 31 December 2025, the aggregate amount drawn under the bilateral facilities was PLN 140 million.

As at 31 December 2025, ORLEN had drawn the entire amount available under the agreement concluded with the European Investment Bank ("EBI") in 2021, i.e. EUR 180 million, repayable in 2029. As at 31 December 2025, ENERGA had also drawn the entire amount available under the agreement with EBI of 2021, i.e. EUR 150 million, maturing in 2038. In November and December 2024, and in March 2025, ORLEN entered into three agreements with EBI for a total amount of PLN 3,500 million to finance a strategic project involving the development of the power grid, including RES connections, grid modernisation and smart-grid investments. As at 31 December 2025, the entire funding amount had been drawn. It is repayable in 2039 and 2040.

In 2023, Baltic Power Sp. z o.o. entered into credit facility agreements to finance its offshore wind farm project, comprising main investment tranches totalling EUR 3,579 million and auxiliary tranches of EUR 603 million and PLN 1,032 million. As at 31 December 2025, the company had drawn EUR 2,367 million under the main tranches, PLN 293 million under the auxiliary tranches, and EUR 150 million and PLN 72 million in the form of guarantees and letters of credit under the auxiliary tranches.

In 2023, CCGT Ostrołęka Sp. z o.o. signed credit facility agreements to finance the construction of a gas-fired power generating unit with the necessary ancillary infrastructure for a total amount of PLN 2,640 million, including a term loan facility of PLN 2,450 million and two revolving credit facilities: for the financing of the company's operations (PLN 50 million) and VAT financing during the construction

period (PLN 140 million). As at 31 December 2025, the amount drawn under this facility was PLN 702 million.

In February 2025, ENERGA Operator S.A. entered into an agreement on funding under the National Recovery and Resilience Plan. The initial funding amount of PLN 7,662 million was subsequently increased to PLN 9,378 million. As at 31 December 2025, the company had drawn PLN 1,494 million, to be repaid in 2050.

In October 2025, ORLEN signed agreements on funding under the National Recovery and Resilience Plan for up to PLN 1,800 million and EUR 397 million (PLN 1,678 million). As at 31 December 2025, no funds had been drawn and the full financing amount was not yet available.

In 2025, the financial ratios presented in Section 5.4. of this Report confirm ORLEN Group's full capacity to meet payment obligations under its credit facility agreements and other arrangements with banks and financial institutions. For additional information on the ORLEN Group's debt structure, see Note 12.8 to the consolidated financial statements for 2025.

As at 31 December 2025, the ORLEN Group had in place the following financing arrangements:

- PLN 4,000 million domestic unlisted bond programme established in 2006; bonds outstanding: Series D with a nominal value of PLN 1,000 million and Series E with a nominal value of PLN 2,000 million (ORLEN);
- EUR 5,000 million global medium term note (GMTN) programme; notes outstanding: Series A and Series B, each with a nominal value of EUR 500 million, Series C with a nominal value of USD 1,250 million, and Series D with a nominal value of EUR 600 million (ORLEN);
- Eurobond programme of ENERGA Finance AB; outstanding bonds worth EUR 300 million; subscription agreement and project finance agreement concluded between ENERGA S.A. and the European Investment Bank (EIB); bonds outstanding: subordinated bonds with a nominal value of EUR 125 million (ENERGA).

In December 2025, as part of the domestic unlisted bond programme ORLEN redeemed 5-year variable-rate corporate bonds with a nominal value of PLN 1,000 million (Series C), and issued seven-year unsecured variable-rate corporate bonds with a nominal value of PLN 2,000 million (Series E). The interest rate on Series D bonds is contingent upon the ESG rating assigned by MSCI ESG Research (UK) Limited or any successor rating agency.

Proceeds from the bonds were allocated to general corporate purposes, including the achievement of the ESG objective defined as maintaining or improving the ESG rating assigned to ORLEN by MSCI ESG Research (UK) Limited as at the issuance date.

Outstanding series under ORLEN's bond programmes, except for the Series D corporate bonds, were admitted to trading and are traded on the regulated Catalyst market of the Warsaw Stock Exchange.

On 20 January 2025, ORLEN converted its European medium term note (EMTN) programme into a global medium term note (GMTN) programme whereby bonds can be issued on the European and American markets.

To facilitate the issuance of eurobonds classified as green bonds, in 2021 ORLEN developed and published the Green Finance Framework, which sets out, among other things, the green objectives to be financed with the proceeds from Eurobond issuances. In June 2025, the Green Finance Framework was revised and it now satisfies the significant contribution criterion under the EU Taxonomy and complies with the Green Bond Principles and the Green Loan Principles. This was confirmed by a SQS2 score assigned by Moody's in its Second Party Opinion issued in June 2025.

In January 2025, as part of the GMTN programme, ORLEN issued 10-year bonds with a nominal value of USD 1,250 million on the North American market (Series C). The bonds bear interest at a fixed rate of 6.00%.

In July 2025, as part of the GMTN programme, ORLEN issued seven-year green Eurobonds with a nominal value of EUR 600 million (Series D), bearing interest at a fixed rate of 3.625%.

As at the end of 2025, credit ratings assigned by Moody's Investors Service and Fitch Ratings to the GMTN programme and related issuances remained unchanged, at A3 and BBB+, respectively.

Bond issuances within the ORLEN Group are eliminated as part of standard consolidation procedures. For details of bond issuances, see Note 12.8.3 to the consolidated financial statements for 2025.

Table 34 Loans granted by the Parent to ORLEN Group companies under agreements in place as at 31 December 2025 [nominal value above PLN 1 billion]

| Company/Group | Year agreement signed | Loan amount under the agreement* | Balance outstanding as at 31 December 2025 | Final maturity date |
|---|---|---|---|---|
| Anwil | May 2019 | PLN 336 million and EUR 234 million (PLN 989 million) | PLN 204 million and EUR 134 million (PLN 565 million) | 30 December 2029 |
| ENERGA | December 2022 | PLN 3,000 million | PLN 2,280 million | 14 May 2027 |
| CCGT Grudziądz | December 2023 | PLN 1,746 million | PLN 1,746 million | 30 September 2038 |
| Energa Wytwarzanie | January 2024 | PLN 1,485 million | PLN 1,433 million | 31 December 2039 |
| Energa Operator | October 2024 | PLN 3,500 million | PLN 2,500 million | 30 September 2039 |
| ORLEN Upstream Norway | August 2010 | NOK 4,100 million (PLN 1,467 million) | NOK 0 million | 31 December 2031 |
| ORLEN Upstream Norway | April 2020 | NOK 5,000 million (PLN 1,789 million) | NOK 0 million | 31 December 2031 |
| ORLEN TERMIKA | July 2018 | PLN 3,000 million | PLN 700 million | 30 June 2028 |
| Polska Spółka Gazownictwa | July 2019 | PLN 2,333 million | PLN 2,333 million | 30 June 2029 |
| PGNiG Obrót Detaliczny | January 2022 | PLN 1,500 million | PLN 0 million | 20 January 2027 |

*At the mid exchange rate quoted by the National Bank of Poland on 31 December 2025.

On 31 December 2019, ENERGA entered into a long-term loan agreement with its subsidiary ENERGA Operator for PLN 4,900 million, including up to PLN 1,566 million for the refinancing of ENERGA Operator's existing long-term bond liabilities to ENERGA, and up to PLN 3,334 million for the financing of the borrower's investment programme implemented between 2020 and 2023. As at 31 December 2025, the amount drawn under the agreement was PLN 1,639 million. On 8 June 2021, ENERGA entered into a PLN 579 million long-term loan agreement with ENERGA OZE for the refinancing of ENERGA OZE's long-term bond obligations to ENERGA. As at 31 December 2025, the amount drawn under the agreement was PLN 216 million.

Table 35 The Parent's borrowings from ORLEN Group companies under agreements in place as at 31 December 2025 [nominal value above PLN 1 billion]

| Company/Group | Year agreement signed | Loan amount under the agreement* | Balance outstanding as at 31 December 2025 | Final maturity date |
|---|---|---|---|---|
| ORLEN Capital | June 2016 | EUR 740 million (PLN 3,130 million) | EUR 133 million (PLN 562 million) | 7 June 2026 |

* Wg kursu średniego Narodowego Banku Polskiego z 31 grudnia 2025 roku

As at 31 December 2025, ENERGA had outstanding borrowings from its subsidiary ENERGA Finance AB under two loan agreements entered into in March 2013 for a total amount of EUR 499 million, with a final maturity date of 27 February 2026. As at 31 December 2025, the amount drawn under these loans was EUR 110 million. In addition, as at 31 December 2025, EUR 100 million had been drawn under a EUR 200 million loan agreement entered into in June 2017, maturing on 28 February 2027.

As at 31 December 2025, the ORLEN Group's off-balance-sheet liabilities arising from guarantees and sureties comprised:

- sureties and guarantees issued on behalf of subsidiaries in favour of third parties, totalling PLN 21,170 million;
- bank and insurance guarantees of PLN 8,948 million;
- guarantees issued in the ordinary course of business in respect of obligations to third parties, totalling PLN 4,845 million.

For more information on guarantees and sureties, see Section 14.1.4 to the consolidated financial statements for 2025.

Financial instruments are presented in Section 12.12 and bank borrowings in Section 12.9 to the consolidated financial statements for 2025.

## Dividend policy

The ORLEN Group's strategy to 2035 includes a commitment to regularly distribute profits to shareholders in the form of dividends. The Company follows a progressive dividend policy, aiming to increase the guaranteed dividend by PLN 0.15 per share annually. For 2025, the guaranteed dividend was raised from PLN 4.30 to PLN 4.50 per share. In addition, the Management Board has the flexibility to recommend higher dividend payouts, up to 25% of annual operating cash flows, net of financing costs.

Table 36 Dividends paid in 2021–2025

| | 2025 | 2024 | 2023 | 2022 | 2021 |
|---|---|---|---|---|---|
| Dividend for financial year [PLN billion] | 6.97 | 4.82 | 6.39 | 1.50 | 1.50 |
| Dividend per share [PLN] | 6.00 | 4.15 | 5.50 | 3.50 | 3.50 |

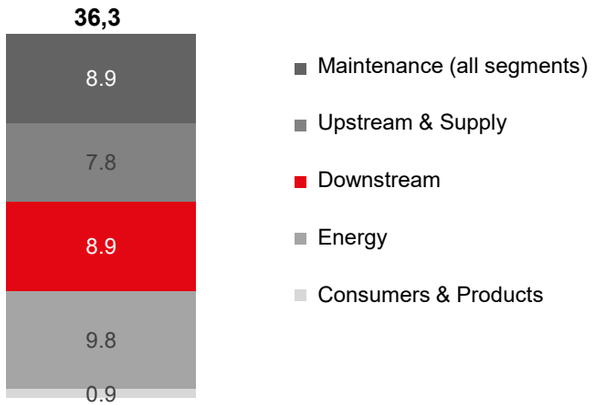
The total amount of dividends paid by ORLEN since its first-time listing on the stock exchange in 1999 exceeds PLN 30.5 billion.

The Ordinary General Meeting of ORLEN S.A. held on 5 June 2025, having reviewed the Management Board's recommendation and the Supervisory Board's opinion resolved to allocate PLN 6,965,652,294.00 for the payment of a dividend, corresponding to PLN 6.00 per share.

The Annual General Meeting set 14 August 2025 as the dividend record date and 1 September 2025 as the dividend payment date.

## 5.6 Growth prospects in 2026

Chart 30 Planned 2026 capex [PLN billion]




In line with our strategy to 2035, in 2026 we will continue to implement investment projects across the ORLEN Group's key business segments, building long-term value while taking into account market and regulatory conditions. The main projects and initiatives planned for 2026 are outlined below.

In the Upstream & Supply segment, exploration and production projects are planned in Norway and Poland, aimed at developing and maintaining the Group's resource base.

Planned expenditure in Downstream will include spending on the New Chemistry monomer units in Płock (740 thousand tonnes of ethylene), the hydrocracking unit in Mažeikiai (expected to increase the share of high-margin products by 12 percentage points), the hydrocracked base oil unit in Gdańsk (400 thousand tonnes of Group 2 base oils annually), and the rapeseed oil pressing plant in Kętrzyn (200 thousand tonnes of oil annually for use in the production of low-carbon biofuels).

In the Energy segment, work will continue on the offshore wind farm projects in the Baltic sea: Baltic Power (1.2 GW) and Baltic East (1.0 GW). The electricity and gas networks will be expanded and modernised, while the following CCGT units will be constructed: Ostrołęka (745 MWe), Grudziądz (560 MWe), Grudziądz #2 (560 MWe) and Gdańsk (560 MWe). Solar PV farms will also be developed in Poland and Lithuania.

Plans for the Consumers & Products segment include further expansion and modernisation of the service station network, growth in non-fuel sales, and the development of alternative fuels infrastructure (e-mobility).

## 5.7 Financial condition of ORLEN S.A.

Table 37 Selected items of ORLEN S.A.'s financial statements [PLN million]

| | 2025 | 2024 | change |
|---|---|---|---|
| Revenue | 174,483 | 201,353 | (26,870) |
| Cost of sales | (152,271) | (180,924) | 28,653 |
| LIFO-based EBITDA before impairment losses | 11,511 | 11,759 | (248) |
| EBITDA | 10,610 | 11,604 | (861) |
| Operating profit | 5,959 | 7,240 | (1,281) |
| Profit before tax | (6,293) | 7,326 | (13,619) |
| Net profit | (7,918) | 5,237 | (13,155) |
| | | | |
| Net cash provided by operating activities | 20,067 | 12,895 | 7,172 |
| Net cash provided by (used in) investing activities | (3,267) | (8,995) | 5,728 |
| Net cash provided by (used in) financing activities | 1,992 | (5,368) | 7,360 |
| Net increase/(decrease) in cash | 18,792 | (1,468) | 20,260 |

| | 2025 | 2024 | change |
|---|---|---|---|
| Total assets | 194,065 | 197,373 | (3,308) |
| Non-current assets | 136,389 | 151,730 | (15,341) |
| Current assets, including: | 57 676 | 45,643 | 12,033 |
| Inventories | 10,727 | 12,779 | (2,052) |
| Total liabilities and equity | 194,065 | 197,373 | (3,308) |
| Total equity | 125,417 | 138,117 | (12,700) |
| Total non-current liabilities | 25,383 | 18,873 | 6,510 |
| Toal current liabilities | 43,265 | 40,383 | 2,882 |
| Total liabilities | 68,648 | 59,256 | 9,392 |

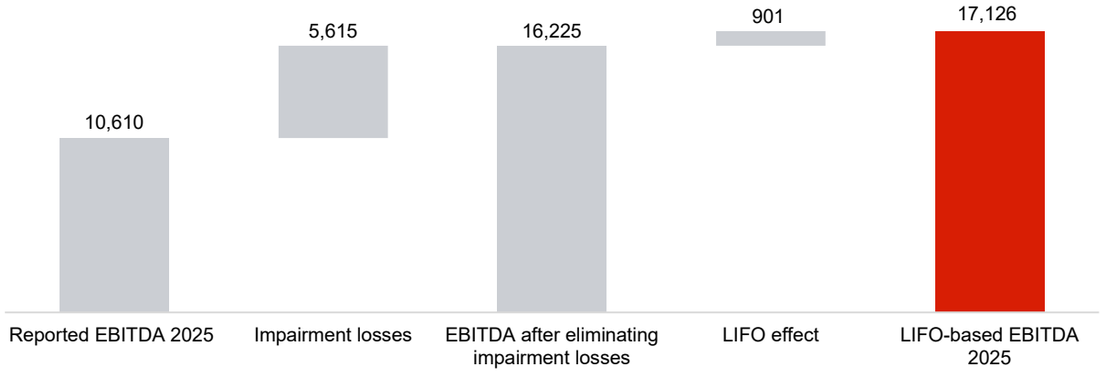
ORLEN did not publish financial forecasts for 2025.

In 2025, the Company recognised revenue of PLN 43,607 million from sales of products and goods for resale to two customers, with revenue from each of them individually exceeding 10% of total revenue. In 2024, the Company recognised revenue of PLN 49,138 million from sales of products and goods for resale to a single customer, which individually accounted for more than 10% of total revenue. The revenue was mainly generated by the Downstream and Upstream & Supply segments. The customers were subsidiaries of ORLEN.

In 2025, more than 10% of the Company's total revenue was generated from transactions executed on the Polish Power Exchange and cleared by the Commodity Clearing House (IRGiT).

In 2025 and 2024, ORLEN S.A. did not enter into any transactions with related parties other than on an arm's length basis. For details of the Company's transactions and balances with related parties, see Section 13.7.2 to the financial statements of ORLEN for 2025. Transactions between ORLEN and State Treasury-related entities are presented in Section 13.7.3.

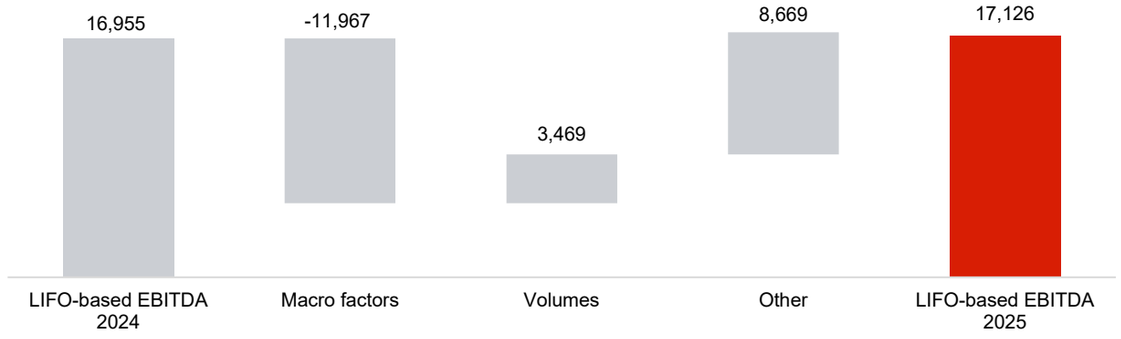
Chart 31 LIFO-based EBITDA* after eliminating impairment losses [PLN million]




* Grupa ORLEN wycenia zapasy w sprawozdaniach finansowych zgodnie z Międzynarodowymi Standardami Sprawozdawczości Finansowej (MSSF) według metody średnio ważonego kosztu wytworzenia lub ceny nabycia.

- ORLEN's EBITDA for 2025 came in at PLN 10,610 million.
- The net effect of impairment losses on assets was PLN -5,615 million.
- The effect of oil price movements on inventory measurement reflected in EBITDA was PLN -901 million.
- As a result, for 2025 ORLEN S.A. recorded LIFO-based EBITDA excluding impairment losses om assets of PLN 17,126 million.

Chart 32 Drivers of LIFO-based EBITDA evolution (year on year) [PLN million]




## Macroeconomic factors

- year-on-year decline of PLN -9,390 million in margins on sales of high-methane gas in the Upstream & Supply segment
- negative effect of hedging transaction settlements, foreign exchange rates, and higher $CO_2$ emission costs driven by higher allowance prices, totalling PLN -4,839 million year on year
- positive effect of margins and oil price differentials in the Downstream segment, amounting to PLN 1,747 million year on year
- lower natural gas and coal prices in conventional power generation, translating into higher margins on energy sales, which improved the result by PLN 279 million year on year

## Volumes

- positive effect of PLN 2,661 million from an 18% increase in gas sales volumes in the Upstream & Supply segment, to 243.6 TWh, driven by recovering demand from the industrial sector following the rise in commodity prices caused by the conflict in Ukraine
- year-on-year decrease of 1.8% (398 thousand tonnes per year) in sales volumes in the Downstream segment, caused by declines of 239 thousand tonnes in petrochemical sales volumes and 159 thousand tonnes in refining product sales volumes
- year-on-year increase in fuel sales, with gasoline up by 88 thousand tonnes, diesel up by 56 thousand tonnes, and jet fuel up by 119 thousand tonnes
- year-on-year decrease in sales of heavy fractions by 423 thousand tonnes; as these products were sold at a negative margin, this had a positive financial effect
- improvement of the sales mix as a result of the commissioning of the visbreaking and HOG units at ORLEN S.A., which increased yields of high-margin fractions
- reduced sales of polyolefins (down by 167 thousand tonnes) and olefins (down by 66 thousand tonnes) year on year, resulting from unfavourable market conditions, with growing competition from Asian manufacturers
- year-on-year increase of 0.5% in electricity sales in the Energy segment, to 6.4 TWh, which improved the result by PLN 116 million year on year
- year-on-year decrease of 81 thousand tonnes in sales volumes in the Consumers & Products segment, driven by growing market competition in this segment

## Other

- PLN 15,109 million – absence in 2025 of the negative effect of the contribution to the Price Difference Compensation Fund recognised in 2024
- PLN -2,466 million – year-on-year effect of accounting for assets and liabilities of the former PGNiG Group as at the merger date
- PLN -735 million year on year – effect of using higher-cost inventory layers (mainly crude oil and refining products)
- PLN -715 million year on year – reduced resale of electricity (trading activities) in the Energy segment due to the maintenance shutdown at the Włocławek CCGT plant
- PLN -2,524 million year on year – other factors, including mainly higher overheads and labour costs, lower margins on gas sales in the Upstream & Supply segment (in 2025, counterparties exercised the option to switch from index-linked prices to fixed prices), net other operating income/expenses reflecting, among other things, the absence of insurance compensation received in 2024 (for the vacuum residue hydrodesulphurisation and hydrocracking units), the absence of net gain on emission allowance trading recognised in 2024, and the recognition of provisions for potential liabilities to Gazprom arising from retroactive recalculation of the Yamal Contract price, as well as the positive effect of the recognition of income from interest accrued on overpayments for gas supplies (resulting from the favourable arbitration court ruling on ORLEN S.A.'s claim against Gazprom), and positive foreign exchange differences and interest on trade receivables These negative effects were partly offset by improved sales margins in the Downstream segment, higher fuel and non-fuel margins in the Consumers & Products segment, and higher margins on gas distribution services.

## 5.8 Ratings

ORLEN is currently rated by two independent credit rating agencies: Fitch and Moody's.

Both ratings assigned to the ORLEN Group are investment-grade. Moody's has assigned an A3 rating with a stable outlook, while Fitch has assigned ratings of BBB+ and AA+(pol), also with a stable outlook, reflecting the Company's strong and stable financial standing.

Table 38 ORLEN credit ratings

| | Fitch | Moody's |
|---|---|---|
| Long-term domestic currency rating | BBB+ | A3 |
| Long-term foreign currency rating | BBB+ | - |
| Rating of senior unsecured domestic currency debt | AA+(pol) | - |
| Rating of senior unsecured foreign currency debt | BBB+ | A3 |
| Long-term sovereign rating | AA+(pol) | - |
| Rating outlook | Stable | Stable |
| Rating date | 7 January 2002 | 18 July 2007 |
| Most recent rating change | 9 November 2022 | 27 October 2022 |
| Most recent rating review | 2 March 2026 | 20 May 2025 |

# 6. Sustainability Statement

**Dear Readers,**

The fuel and energy sector is facing an exceptional challenge today: the systemic transformation of its business model in the context of the energy transition. This demanding process is unfolding alongside far-reaching technological and regulatory change, affecting both the market as a whole and the way the ORLEN Group operates. In this context, we view ESG and sustainability reporting not merely as a legal obligation, but as a strategic management tool that helps us run our business and make decisions in an environment marked by uncertainty and an increasing scale of systemic risks.

The transformation of the fuel and energy sector is affecting multiple aspects of how organisations operate – from technology and infrastructure, through regulation and system security, to the people who are responsible for delivering this change and whose day-to-day work continues to evolve with it. Decarbonisation requires not only substantial capital investment, but also the ability to act in a dynamic market environment. Increasingly, it also means taking account of the potential effects of climate change in business decisions, including severe weather events, which year by year are becoming a factor with a real impact on operations. At the same time, we are fully aware that even under the most challenging conditions, the transition must be carried out responsibly and fairly, ensuring continuity of energy supply and keeping in mind economic stability and social wellbeing.

Against this backdrop, the role of the ORLEN Group as Poland's largest integrated multi-energy company takes on particular significance. We operate in sectors that have a material bearing on the climate and the environment, while at the same time serving as one of the pillars of energy security. The tension between the need to reduce emissions and the imperative to ensure stable energy supplies remains one of the key challenges of the transition. For the ORLEN Group, sustainability and ESG provide a framework for managing this challenge in a considered way – through balanced ambitions and targets that guide our actions, metrics that enable us to monitor progress, and responsible, transparent capital allocation.

The scale of our operations adds a further layer of complexity to this process. We operate across multiple business segments and geographies, under different legislative regimes and on the basis of diverse assets and operating models. In our case, transformation does not mean a series of isolated projects, but the comprehensive restructuring of our entire business portfolio. It is a process that requires not only significant financial resources, but also the commitment of our employees and a willingness to adapt on the part of our business partners.

For the ORLEN Group, 2025 was a year of intensive work to further strengthen and streamline our approach to sustainability. We revised our double materiality assessment process and continued refining our reporting approach, including data collection and verification, in order to present the ORLEN Group's sustainability performance in a fair and reliable manner.

Concurrently, we are pursuing the transformation measures set out in the ORLEN Transition Plan and the ORLEN Group Sustainable Development Strategy for 2025–2035. We continue to invest in renewable energy sources, gas production, biofuels and hydrogen technologies. Our overarching strategic objective remains the phase-out of coal from electricity generation by 2030 and from heat generation by 2035. We are also taking a range of measures to improve occupational safety and strengthen the sustainability of our supply chain, including by further developing our standards for cooperation with business partners.

ESG therefore remains inseparable from our business activities. Managing sustainability-related impacts, risks and opportunities is essential to the long-term resilience of our business model and to maintaining the trust of all our stakeholders. In the context of the fuel and energy sector, this means above all delivering the transition responsibly – through dialogue with stakeholders, consistent progress towards our targets, and alignment between our actions and the ambitions set out in both of the Group's strategies.

The ORLEN Group Sustainability Statement for 2025 reflects this approach and provides a point of reference for our activities in the years ahead.

**Yours faithfully,**



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Ireneusz Fąfara

President of the Management Board

# 6.1 General disclosures [ESRS 2]

## 6.1.1 General basis for preparation of sustainability statement [BP-1]

This Sustainability Statement (“Statement”) has been prepared on the basis of:

- the requirements of Chapter 6c of the Accounting Act of 29 September 1994 (consolidated text: Dz. U. of 2023, item 120, as amended);
- the sustainability reporting standards as defined in Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards;
- the reporting requirements under Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 (“Regulation (UE) 2020/852”).

This Sustainability Statement covers ORLEN S.A. as the parent and the ORLEN Group. The consolidation scope is the same as in the ORLEN Group’s consolidated financial statements for the previous financial year.

In the case of ongoing upstream projects in Canada and Norway, our activities are to a large extent conducted through joint operations. Depending on the role of ORLEN Group companies in individual projects, as the project’s operator or a non-operator partner, greenhouse gas emissions were reflected accordingly in the disclosures prepared in line with the requirements of ESRS E1.

Rafineria Gdańska, as a joint operation conducted through a separate vehicle, is consolidated at 70% of its assets and liabilities. This proportionate share has been included in disclosures E1, E2, E3, E4, E5, S1-6 and S1-9.

In the ORLEN Unipetrol Group, the joint operation carried out through Butadien Kralupy, in which ORLEN Unipetrol holds a 51% interest, has been reflected in disclosures E1, E2, E3, E4, E5 and S1 in proportion to that interest.

This Sustainability Statement covers relevant information from across the value chain, including suppliers (upstream) and consumers (downstream).

For detailed information on entities covered by this Sustainability Statement for 2025 by segment, see Notes 7.1 and 12.6 to the consolidated financial statements for 2025.

The ORLEN Group prepares sustainability reporting annually. We have used the option provided for in the ESRS not to disclose classified, and in particular legally protected information, including information relating to intellectual property and know-how with respect to cybersecurity.

We have used the exception from disclosing impending developments or matters in the course of negotiation, available under Article 63r(7) of the Accounting Act (in accordance with Articles 19a(3) and 29a(3) of Directive 2013/34/EU).

## 6.1.2 Disclosures in relation to specific circumstances [BP-2]

### Time horizons

We follow the definitions of time horizons provided in disclosure ESRS 1, Section 6.4:

- short-term time horizon: up to 1 year,
- medium-term time horizon: 1 to 5 years,
- long-term time horizon: beyond 5 years.

### Value chain estimation; sources of estimation

For the ORLEN Group’s value chain, estimates of upstream and downstream data were used when calculating selected Scope 3 emission categories where access to primary data is limited:

- Category 1 (purchased goods and services) – estimates based on actual data on purchases of raw materials and goods, as well as literature-based emission factors (from databases such as Defra, KOBiZE and Ecoinvent).
- Category 2 (capital goods) – estimation based on CAPEX figures (spend based approach) and emission factors assigned to spending categories.
- Category 3 (fuel- and energy-related activities) – estimates based on actual data on the transport, combustion and use of fuels, energy consumption, and literature-based emission factors (from databases such as Defra, KOBiZE and Ecoinvent).
- Category 10 (processing of sold products) – estimates based on actual data on sales of products and goods, as well as literature-based emission factors (from databases such as Defra, KOBiZE and Ecoinvent).
- Category 11 (use of sold products) – estimates based on actual data on sales of products and goods, as well as literature-based emission factors (from databases such as Defra, KOBiZE and Ecoinvent).

### Outcome uncertainty

Most of the metrics disclosed in this Sustainability Statement are based on real-world primary data. Where access to complete real-world data was limited, we ensured the completeness of the disclosures by using estimates, which were prepared based on the best available sector-specific methodologies and practices. Scope 3 GHG emissions were estimated based on secondary data. The methodology for calculating this indicator is explained in disclosure E1-6.

For information on the methodologies, data scope, information sources, assumptions as well as descriptions of estimates and, see the relevant thematic sections of this Sustainability Statement.

## Changes in preparation or presentation of sustainability information and reporting errors in prior periods

Compared with the 2024 disclosures, changes have been to the double materiality assessment to aggregate individual impacts, risks and opportunities with a similar nature and management approach. The impact assessment was also linked to the financial assessment. For a description of the changes, see disclosure SBM-3.

In selected areas, particularly in relation to quantitative data aggregated for the ORLEN Group, we identified differences in the presentation of information. The revised comparative data for the previous reporting period relate to the following disclosures:

E1 we have reassessed the materiality of selected Scope 3 emission categories, and made changes to the emission calculation methodology. In 2024, emissions were estimated based on emissions for 2023. In 2025, emissions were calculated based on actual data and data for 2024 were recalculated. For a description of the adopted methodology, see disclosure E1- 6.

E2 pollution data for the ORLEN Group have been adjusted to reflect the thresholds set out in the E-PRTR Regulation. This change was necessary as the original dataset included values below the thresholds specified in the Regulation for the relevant pollution parameters and therefore had to be recalculated. The change resulted from recalculating the actual data for 2025 and 2024, respectively, taking into account the threshold values. Data on air emissions were also replaced with actual values and data for Rafineria Gdańska and the Unipetrol Group were recalculated.

E3 numerical disclosures have been presented for the entire ORLEN Group. In 2024, the disclosures covered only ORLEN S.A.

E5 the disclosure on products placed on the market has been expanded to cover the entire ORLEN Group. In 2024, the disclosure covered the production companies. In addition to waste generated and treated, we have also included waste stored.

S1 disclosures S1-13, S1-16, S1-17 have been expanded to cover the entire ORLEN Group. In 2024, the disclosures covered only ORLEN S.A. Percentages of employees entitled to family-related leave and employees that took family-related leave have been adjusted following clarification of the definition of ‘family-related leave’; for details, see disclosure S1-15. Number of days lost due to work-related injuries has been adjusted; for details, see disclosure S1-14.

G1 the disclosure on payment practices has been expanded to cover the entire ORLEN Group. In 2024, the disclosure covered only ORLEN S.A.

Differences between the figures actually disclosed and the revised comparative figures for the previous reporting period (2024) are presented directly in the relevant thematic sections of this Sustainability Statement.

For a detailed description and impact on comparability, see the relevant thematic section of this Sustainability Statement.

## Incorporation by reference

The table below lists the information that has been incorporated in this Sustainability Statement by reference.

Table 39 List of information incorporated in this Sustainability Statement by reference

| Disclosure requirement | Reference to: |
|---|---|
| BP-1 5 (b) (i) – scope of consolidation consistent with the financial statements | Consolidated financial statements for 2025, Note 7.1 and Note 12.6 |
| SBM-1 Value chain by segment | Management Board’s Report on the operations of the ORLEN Group and ORLEN S.A. in 2025, Section 4 |
| SBM-1 paragraph 40 (b) breakdown of total revenue, as reported in financial statements | Consolidated financial statements for 2025, Note 11.1 |
| SBM-1 paragraph 40 (d) i. – a statement indicating, together with the related revenues, that the undertaking is active in: (i) the fossil fuel (coal, oil and gas) sector | Consolidated financial statements for 2025, Note 11.1 |
| SBM-3 48 (d) – current financial effects | Consolidated financial statements for 2025, Note 4.3 and Note 12.6 |
| GOV-1 paragraph 21 a-e – Disclosure on the composition and diversity of the Management Board and Supervisory Board | Management Board’s Report on the operations of the ORLEN Group and ORLEN S.A. in 2025, Section 7 |
| S1-6 50 (f) – cross-reference of reported information to the most representative number in the financial statements | Consolidated financial statements for 2025, Note 11.3 |

## Use of phase-in provisions in accordance with Appendix C of ESRS 1

We have used the option to omit the information on expected financial impacts resulting from material physical and transition risks and potential opportunities related to climate (E1-9), pollution (E2-6), water and marine resources (E3-5), biodiversity and ecosystems (E4-6), resource use and circular economy (E5-6) and characteristics of non-employees in the undertaking's own workforce covered by disclosure S1-7 and S1-14.

This Sustainability Statement has been subject to external assurance. The assurance was provided by the audit firm KPMG Audyt Spółka z ograniczoną odpowiedzialnością sp.k. in accordance with the National Standard on Sustainability Reporting Assurance Engagements 3002PL – Limited assurance engagements on sustainability reporting (KSUA 3002PL) and, as applicable, National Standard on Assurance Engagements other than Audits and Reviews 3000 (Z), compliant with International Standard on Assurance Engagements (ISAE) 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information (KSUA 3000 (Z)).

### 6.1.3 The role of the administrative, management and supervisory bodies [GOV-1]

Disclosure on the composition and diversity of the Management Board and Supervisory Board is incorporated by reference to Section 7 of the Management Board's Report. There is no employee representative on the Management Board.

## Sustainability competencies

The current membership of the Management Board and Supervisory Board guarantees versatility and diversity in terms of education, gender and professional background. Members of the ORLEN Supervisory Board and Management Board possess experience and expertise in sustainable development, gained through their managerial roles in entities operating in the energy sector. Their experience includes managing companies engaged in the development of renewable energy sources, overseeing projects in the field of low- and zero-carbon energy, and participating in key initiatives and events related to climate change.

Members of the Management Board and the Supervisory Board appointed to their respective positions possess high-level qualifications and professional experience.

Table 40 Number of executive and non-executive members of administrative, management and supervisory bodies

| Number of executive members (Management Board) | Number of non-executive members (Supervisory Board) |
|---|---|
| 10 | 9 |

Table 41 Number of members of the Management Board and Supervisory Board by gender and number of independent members of the Management Board

| | Number of women | Number of men | Percentage of women | Percentage of men | Number of independent members | Percentage of independent members | **Total** |
|---|---|---|---|---|---|---|---|
| Management Board | 0 | 10 | 0% | 100% | 0 | 0% | **10** |
| Supervisory Board | 3 | 6 | 33% | 67% | 7 | 78% | **9** |

Members of the Management Board attend external conferences and events focused on climate change issues. In 2025, Supervisory Board and Management Board members completed training on the decarbonisation of the production plant in Płock. In addition, Supervisory Board members took part in workshops on sustainability and energy transition, covering due diligence and respect for human rights, as well as on ESG reporting.

Furthermore, we are actively involved in national and international partnership initiatives supporting strategic activities, regulatory changes and adoption of implementing regulations concerning ESG and human rights. ORLEN S.A. and other ORLEN Group companies are members of numerous external organisations, which provide a platform for sharing knowledge and developing competence in the field of sustainability.

Key organisations of which ORLEN S.A. is a member include:

- Business & Science Poland,
- UNGC (UN Global Compact),
- FOB (Responsible Business Forum),
- CEFIC (European Chemical Industry Council),
- Fuels Europe,
- Hydrogen Europe,
- International Gas Union,
- IOGP (International Association of Oil and Gas Producers),
- OGDC (Oil & Gas Decarbonization Charter),
- PIPC (Polish Chamber of Chemical Industry),

- WindEurope,
- TNFD Taskforce on Nature-related Financial Disclosures.

### 6.1.4 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies [GOV-2]

Responsibility for oversight of sustainability matters has been assigned to the Company's top governing bodies, including the Management Board and the Supervisory Board, ensuring ongoing integration of sustainability topics into strategic planning, risk and opportunity management and capital allocation processes.

The responsibilities of the Supervisory Board, including the Sustainability Committee, are set out in the Rules of Procedure for the Supervisory Board.

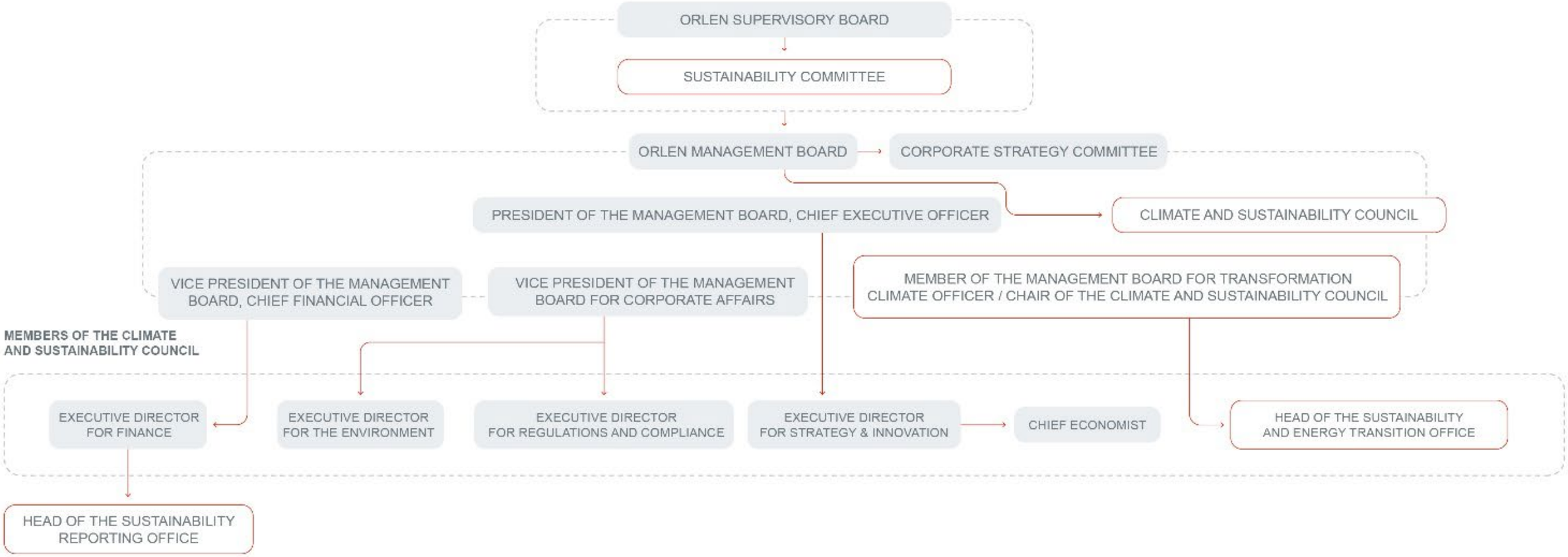
The responsibilities of the Management Board are governed by the generally applicable laws, the Company's Articles of Association and the Rules of Procedure for the Management Board. Furthermore, based on the Management Objectives framework established by the ORLEN S.A. General Meeting, the Supervisory Board determines bonus targets for the Management Board members, which are documented in their MBO Sheets. The Management Objectives, as well as the weights and criteria for their delivery, are specified in detail in a Supervisory Board resolution. For 2025, the Supervisory Board set quantitative and qualitative objectives for the Management Board members, reflecting their respective scopes of responsibility, assigned relevant bonus thresholds to these objectives, and defined separate targets for variable remuneration.

The Supervisory Board and the Management Board are presented with biannual reports on the delivery of the Sustainable Development Strategy and the Climate Policy, biannual reports on activities related to the monitoring of the Company management for compliance with the ORLEN Group Code of Ethics and the Human Rights Policy, biannual reports on the delivery of the ORLEN Group Charitable Policy, and a business strategy progress report prepared at least twice a year.

In 2025, the management of economic, environmental and climate impacts was discussed at about 13 meetings of the ORLEN S.A. Management Board and at about 13 meetings of the Supervisory Board and its Committees.

The operational implementation of sustainability and climate activities is carried out by the relevant business areas of the ORLEN Group, which are responsible for strategy operationalisation, progress monitoring and reporting to administrative and management bodies. Monitoring mechanisms include regular reporting to the Management Board and Supervisory Board, including updates on the execution of the business strategy that incorporate information on progress against the ORLEN Transition Plan, including emission reduction targets.

Figure 10 Management of climate- and sustainability-related issues



## Management bodies

The Management Board is responsible for the oversight over sustainability and approves the outcomes of the double materiality assessment process, including any identified material impacts, risks and opportunities, based on information provided at least annually.

The Management Board is responsible for defining and implementing the ORLEN Group's strategy, including sustainability and climate objectives. It oversees sustainability matters and approves key strategic decisions. Quarterly monitoring of strategy progress constitutes a key element of the Management Board's oversight over sustainability across the ORLEN Group.

At the operational level, sustainability objectives are implemented by relevant ORLEN Group business areas and corporate functions, which are responsible for strategy operationalisation, execution of activities within their respective remits, and progress monitoring. This ensures that sustainability objectives are integrated into day-to-day operations, decision-making processes, and the Group-wide system for managing risks and opportunities. These functions cooperate with specialised units responsible for sustainability and energy transition, ensuring alignment across the organisation and the integration of sustainability goals into daily operations and decision-making processes.

Figure 11 Areas of responsibility of ORLEN Management Board Members

| Name | Position | Areas of responsibility |
|---|---|---|
| Ireneusz Fąfara | President of the Management Board, Chief Executive Officer | • Oil trading<br>• Strategy & Innovation<br>• HR<br>• Governing Bodies Support<br>• Audit and Enterprise Risk Management<br>• Public and International Relations<br>• Corporate Governance<br>• Corporate Communication<br>• Sponsorship<br>• Legal |
| Witold Literacki | Vice President of the Management Board, Corporate Affairs | • Procurement<br>• Regulatory Affairs and Compliance<br>• Natural Environment<br>• Process Safety, Fire Safety and Occupational Health<br>• Infrastructure and Information Security Oversight |
| Sławomir Jędrzejczyk | Vice President of the Management Board, Chief Financial Officer | • Business Controlling<br>• Finance<br>• Accounting and Financial Reporting, including: Sustainability Reporting<br>• Tax<br>• Equity Investments<br>• Supply Chain Management<br>• Transformation of Financial Systems<br>• Investor Relations |
| Ireneusz Sitarski | Vice President of the Management Board, Downstream | • Refining Product Wholesale Trading<br>• Petrochemical Product Trading<br>• Logistics<br>• Refining<br>• Petrochemical Production<br>• Engineering |
| Robert Soszyński | Vice President of the Management Board, Chief Operating Officer | • Capital Investments<br>• Gas Trading<br>• Digital Transformation and IT<br>• Administrative Services |
| Marek Balawejder | Member of the Management Board, Consumers & Products | • Sale of Fuels<br>• Non-fuel Sales |

| Name | Position | Areas of responsibility |
|---|---|---|
| | | • Energy Transition<br>• Consumers & Products<br>• Commercial Marketing<br>• E-mobility<br>• Retail Sales Management Process Support |
| Wiesław Prugar | Member of the Management Board, Upstream | • Upstream Area<br>• Upstream Development<br>• Upstream Operations Area<br>• Branches comprising the Upstream Polska Branch Complex of ORLEN S.A. of Spółka Akcyjna and foreign branches of ORLEN S.A., i.e. PGNiG Operator Branch in Pakistan and PGNiG Branch in Ras Al Khaimah, United Arab Emirates – in liquidation |
| Sławomir Staszak | Member of the Management Board, Energy | • Power Generation<br>• Embedded Generation |
| Marcin Wasilewski | Członek Zarządu ds. Transformacji | • Technological Transition<br>• Downstream Development<br>• New Chemicals<br>• Biofuels and Hydrogen<br>• SMRs<br>• Sustainability and Energy Transition |
| Paweł Wojtunik | Członek Zarządu ds. Bezpieczeństwa i Ryzyka | • Control and Security<br>• Risk Management |

Climate risks and opportunities are managed under the oversight of the President of the Management Board and the Member of the Management Board for Transition, who also serves as the Climate Officer and chairs the Climate and Sustainability Council. In addition, in accordance with the division of responsibilities set out in the relevant Management Board resolution, the Member of the Management Board for Transition oversees the Sustainable Development and Energy Transition area, the scope of which is defined in the ORLEN S.A. Organisational Rules.

The President of the Management Board, whose remit is Strategy and Innovation, oversees the implementation of the ORLEN Group Strategy and the ORLEN Transition Plan, ensuring the integration of climate and sustainability considerations into strategic processes at the Group level.

The sustainability reporting processes are overseen by Vice-President of the ORLEN S.A Management Board for Finance.

Climate Officer, appointed by the Management Board, is responsible for:

- Managing climate risks and opportunities, which includes the identification and mitigation of climate risks and leveraging of opportunities arising from regulatory and market developments;
- Overseeing the Company's climate change mitigation initiatives.

The Climate and Sustainability Council is responsible for:

- Monitoring the implementation of the Sustainable Development Strategy, Climate Policy and ORLEN Transition Plan;
- Monitoring and validating sustainability and energy transition metrics;
- Providing opinions on strategic documents, policies and guidelines relating to sustainability, governance and climate change;
- Monitoring of climate risks and opportunities;
- Approving the ORLEN Group's double materiality assessment.

In 2025, the Climate and Sustainability Council held four meetings, addressing considerations such as double materiality assessment, Responsible Communication Code, circular economy, and progress in the implementation of the ORLEN Group Human Rights Policy (Human Rights Policy),

Diversity Policy and Anti-Bullying Policy, as well as other elements of the Sustainable Development Strategy.

Corporate Strategy Committee plays a key role in our corporate governance framework by integrating climate and sustainability considerations into strategic processes. It serves as a forum through which the Climate and Sustainability Council reports directly to the Management Board, ensuring a consistent flow of information on the achievement of strategic objectives, ESG metrics and climate change risks and opportunities.

Through the Corporate Strategy Committee, the Management Board receives regular updates on progress in the implementation of the ORLEN Group strategy, including the Sustainable Development Strategy, Climate Policy and ORLEN Transition Plan. This enables ongoing oversight of energy transition objectives and their integration into strategic decision-making and capital allocation processes. The Committee thus supports the Management Board in decisions relating to the long-term development of the ORLEN Group, ensuring alignment between operational activities and the adopted climate and sustainability objectives..

### Supervisory bodies

The ORLEN S.A. Supervisory Board exercises ongoing oversight over the Company's operations across all areas, including sustainability and climate matters.

The Supervisory Board includes a Sustainability Committee, which supports it in monitoring and assessing the implementation of the Sustainable Development Strategy and sustainability reporting.

The Sustainability Committee:

- oversees the sustainability reporting process, including compliance with applicable laws and standards, the effectiveness of controls and the external assurance process;
- approves the results of the ORLEN Group double materiality assessment;
- reviews and recommends policies and procedures for the selection of audit firms and monitors their independence;
- presents the results of assurance engagements to the Supervisory Board and recommends actions to enhance the reliability and credibility of reported information;
- oversees the implementation of the Sustainable Development Strategy, particularly in the areas of climate, environment, social matters and corporate governance;
- monitors climate risks and opportunities in accordance with the ORLEN Group Climate Policy and the decarbonisation strategy;
- assesses the Company's compliance with the Code of Ethics, the Human Rights Policy and the Diversity Policy;
- provides the Supervisory Board with recommendations on the assessment of the reasonableness of the Company's and the Group's donation spending, including the amounts spent for such purposes.

### 6.1.5 Integration of sustainability-related performance in incentive schemes [GOV-3]

Sustainability-related initiatives and actions have been operationalised and incorporated into our Management by Objectives (MBO) scheme. Their successful implementation has a direct effect on annual bonuses awarded to the Management Board and executive management staff, ensuring alignment of the Group's operations with sustainable development goals. The applicable framework is set out in the Rules of the Incentive Scheme for the Management Board of ORLEN S.A. and rules that govern setting and assessing the delivery of individual bonus-triggering objectives for Management Board members for each year. The documents are adopted by way of a Management Board resolution.

Structure of variable remuneration for the Management Board and other senior executives:

The incentive scheme for the Management Board comprises both qualitative and quantitative objectives. In 2025, the qualitative objectives accounted for 25% of the bonus and included:

- Implementation of the ORLEN 2035 strategy;
- Decarbonisation and sustainability performance. Within this, the climate action- and sustainability-linked incentive represented 10% of the total bonus in 2025 and was contingent upon:
  - Execution of decarbonisation measures contributing to GHG emission reduction in line with the ORLEN Group's operational targets for 2030 and 2035, and the overarching Net Zero 2050 ambition;
  - Delivery on tasks across the five pillars of the Group's Sustainability Strategy, i.e. Climate, Environment, Employees, Communities, and Governance.

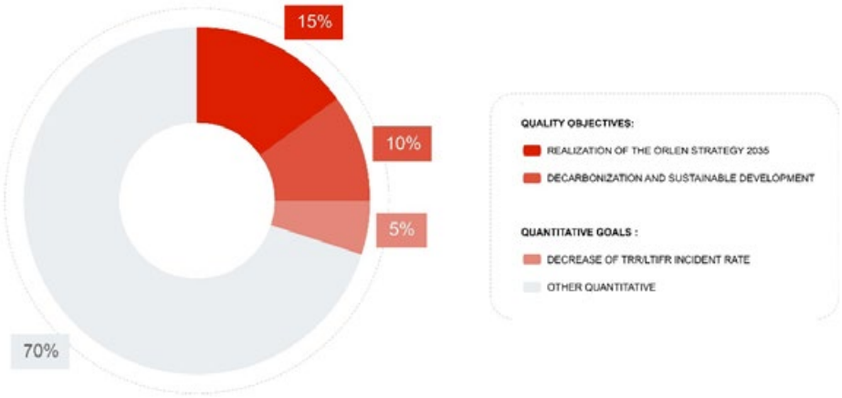
In 2025, quantitative objectives accounted for 75% of the bonus and included:

- reducing the total recordable incident rate (TRIR) (defined as Lost Time Injury Frequency Rate for the ORLEN Group and its external contractors);
- other targets, such as improvements in operational efficiency metrics, cost efficiency, and Total Shareholder Return (TSR) relative to the market.

Furthermore, detailed targets related to the implementation of specific decarbonisation and sustainability projects are linked to performance bonuses payable to senior executives reporting directly to the Management Board and responsible for the delivery of specific GHG reduction initiatives across ORLEN S.A. and other Group companies. The objectives for senior executives are defined in

the Management Board's Order introducing the Bonus Scheme Rules for Directors reporting directly to the ORLEN S.A. Management Board.

Chart 33 Breakdown of Management Board incentive scheme objectives in 2025




### 6.1.6 Statement on due diligence [GOV-4]

Adherence to the responsible business conduct standards is a fundamental aspect of our operations. We follow practices aligned with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, which are designed to prevent negative impacts and to ensure appropriate action is taken when adverse effects occur in connection with our activities, particularly in relation to employees, human rights, natural environment, anti-corruption, consumer protection and business conduct. We also expect that these practices will be complied with by our business partners and companies in our value chain, and in other business relationships.

The principles of responsible business conduct are reflected in numerous internal procedures and processes. The key policies governing these topics include: The ORLEN Group Code of Ethics, ORLEN Group Supplier Code of Conduct, Human Rights Policy, policies on employee matters (including non-discrimination and equal opportunities), Competition Law Compliance Policy, ORLEN Group Anti-Corruption and Fraud Prevention Policy, and policies on reporting irregularities and cases of misconduct.

Importantly, we continue to strengthen and develop our due diligence framework. Ongoing initiatives include the development of a methodology for evaluating supplier sustainability performance and efforts taken to integrate due diligence processes and policies across the entire ORLEN Group. The table below presents selected key elements of our due diligence.

Table 42 Elements of due diligence

| Core elements of due diligence | Section in this Sustainability Statement |
|---|---|
| Embedding due diligence in governance, strategy and business model | ESRS 2 GOV-2, ESRS 2 GOV-3, ESRS 2 GOV-4<br>ESRS 2 SBM-1, ESRS 2 SBM-3 |
| Engaging with affected stakeholders in all key steps of the due diligence | ESRS 2 SBM-2<br>ESRS 2 SBM-1, SBM-3, IRO-1<br>S1-2, S2-2, S3-2, S4-2<br>G1-2 |
| Identifying and assessing negative impacts | ESRS 2 SBM-1 SBM-3 IRO-1 E1.IRO-1, E2.IRO-1, E3.IRO-1, E4.IRO-1, E5.IRO-1<br>S1.SBM-3, S2.SBM-3, S3.SBM-3, S4.SBM-3<br>G1.IRO-1 |
| Taking actions to address those negative impacts | E1-3, E2-2, E3-2, E4-3, E5-2<br>S1-4, S2-4, S3-4, S4-4<br>G1-2, G1-3 |
| Tracking the effectiveness of these efforts and communicating | E1-4, E1-5, E1-6, E1-7, E1-8, E2-3, E2-4, E2-5, E3-3, E3-4, E4-4, E4-5, E5-3, E5-4, E5-5<br>S1-5, S1-6, S1-8, S1-9, S1-10, S1-11, S1-12, S1-13, S1-14, S1-15, S1-16, S1-17, S2-5, S3-5, S4-5<br>G1-4, G1-5, G1-6 |

### 6.1.7 Risk management and internal controls over sustainability reporting [GOV-5]

The Enterprise Risk Management System (ERM) is one of the management tools supporting the effective delivery of strategic and operational objectives, and providing information on the risks at ORLEN S.A. and on their effective management. Its purpose is to identify risks that may affect the achievement of ORLEN S.A.'s business objectives.

Enterprise risk management is an ongoing process subject to adjustments necessitated by changes in the economic environment and ORLEN S.A.'s operations, as well as shifts in the materiality of risks affecting the achievement of ORLEN S.A.'s business objectives. Enterprise risk management encompasses activities both at the level of ORLEN S.A. and within individual business processes. Selected key companies of the Group operate risk management systems that are based on the risk management system in place at ORLEN S.A. ORLEN S.A. has adopted an Enterprise Risk Management Policy and Procedure, which is mandatory for all ORLEN S.A. employees. Provisions applicable to ORLEN S.A. employees also apply to individuals providing services to ORLEN S.A. under civil law contracts.

#### Roles in the enterprise risk management process

The ORLEN S.A. Management Board is responsible for overseeing the enterprise risk management process and plays a key role in its operation. As part of its mandate and responsibilities, the Audit

Committee of the Supervisory Board monitors the Enterprise Risk Management System. Risk Owners are ORLEN S.A. employees responsible for managing key risk elements assigned to their functions within the ERM system. Risk Owners are Directors reporting directly to members of the Management Board or authorised managers of organisational units directly reporting to them.

Process Owners and Sub-Process Owners are managers of ORLEN S.A. organisational units responsible for the execution of processes and sub-processes in accordance with the Company's internal policy documents and the Integrated Management System documentation. They are responsible for:

- coordinating control testing and assessing risks within their respective processes and sub-processes;
- validating gross, net and target risk levels identified within the processes and sub-processes and evaluated as part of a self-assessment process;
- agreeing with Risk Owners on the implementation and tracking of remedies..

The Enterprise Risk Management Department oversees the enterprise risk management process and provides tools and methodological support to its participants.

Control Owners are ORLEN S.A. employees designated by Risk Owners as persons responsible for the proper functioning and modification of controls. They are tasked with the oversight of control activities. Control Owners are required to cooperate fully with Process Owners, Risk Owners and the Enterprise Risk Management Department as part of the self-assessment of identified risks and control testing, including the design of new controls.

## Control mechanisms

Process Owners are responsible for coordinating and ensuring the reliable and timely implementation of the assessment of enterprise risk controls within each process. Individual controls are tested by Control Owners or authorised persons, subject to the requirement that testing should be performed by a person other than the individual performing the control activity. Control testing (control self-assessment) is a component of risk assessment and covers two aspects: assessment of the control design and testing of the operation (effectiveness) of controls.

Controls relating to risks associated with sustainability reporting are described in the Instruction for Preparing the ORLEN Group Sustainability Statements. Risks and opportunities are identified by the ORLEN S.A. datapoint coordinators and, in specific cases, by data coordinators from other ORLEN Group companies. Datapoint coordinators are ORLEN Group employees who provide specialist support and expert input in the process. The various stages of the assessment of impacts, risks and opportunities, are regularly discussed during meetings of the Climate and Sustainability Council and the Sustainability Committee. The documents are ultimately approved by the Management Board and Supervisory Board.

The objective of the sustainability reporting process is to minimise:

- corrections to the published statements,
- erroneous business decisions based on inaccurate data presented in a statement,
- the risk of the auditor issuing an adverse opinion,
- deterioration of ratings and business relationships,
- loss of stakeholder trust in the ORLEN Group,
- potential penalties..

The reporting process must ensure the completeness and reliability of the data presented and the accuracy of estimates.

Key risks identified in the sustainability reporting process include:

- errors in data collection and consolidation,
- regulatory changes,
- insufficient human resources and employees' failure to exercise due diligence,
- insufficient information in relation to stakeholder expectations.

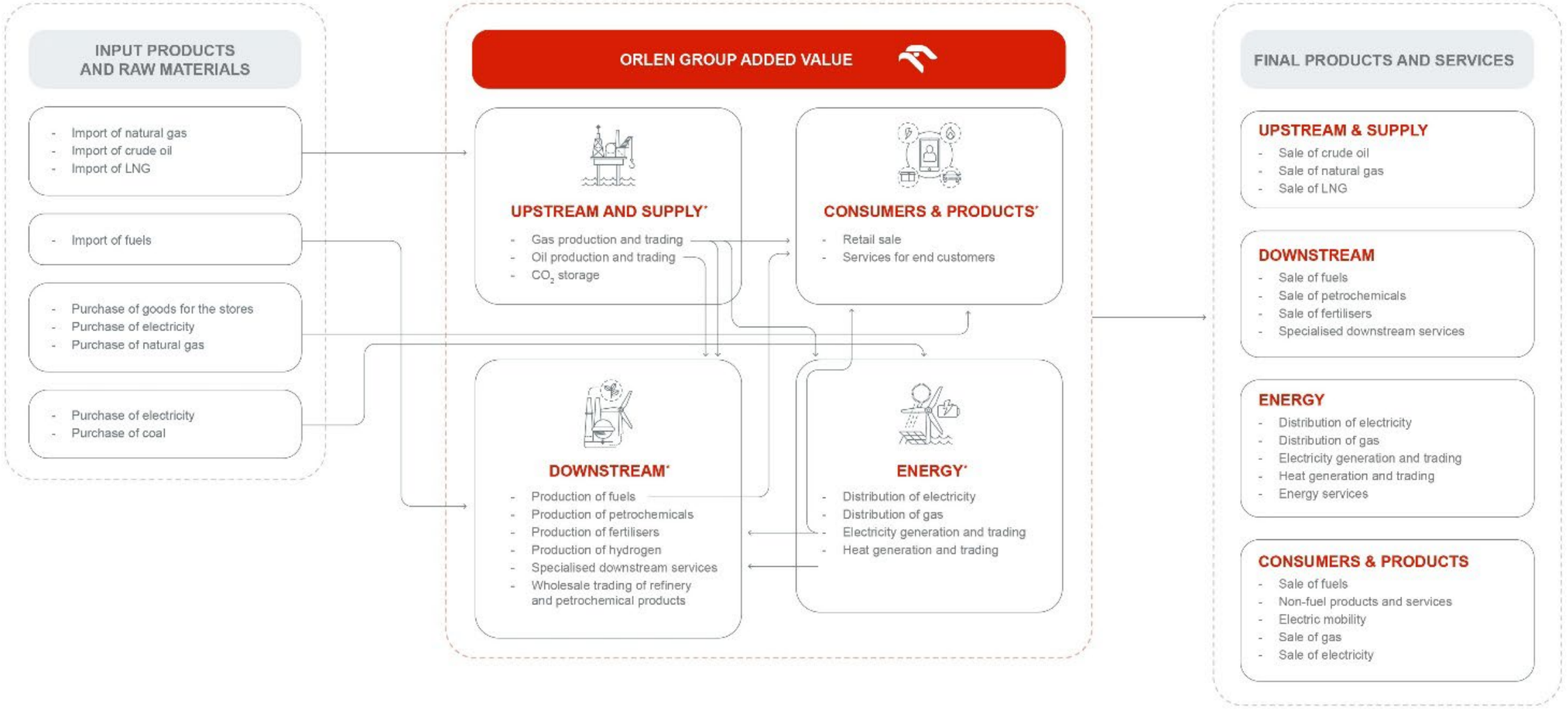
Mitigation measures and related controls include:

- training for individuals involved in the reporting process,
- reporting in accordance with applicable regulations,
- preparation of instructions defining roles and responsibilities for figures and narrative content,
- internal control over the reporting process..

Risks related to the scopes of sustainability disclosures are reported within the enterprise risk management framework, which is overseen by the Head of the Audit and Enterprise Risk Management Office. A risk report is prepared annually at ORLEN S.A. based on the outcomes of the risk self-assessment and control testing. The report is submitted to the Management Board. For information on enterprise risks related to the scope of sustainability disclosures, see Section 4.6 of the Management Board's Report. The risk prioritisation methodology is described in disclosure IRO-1.

## 6.1.8 Strategy, business model and value chain [SBM-1]

Figure 12 ORLEN Group business model



ORLEN Group companies are engaged in the following types of activity:

- exploration, appraisal, import and production of hydrocarbons;
- energy generation (power and heat), refining and petrochemical activities including crude oil processing and manufacturing of refining, petrochemical and chemical products and intermediates, biofuels and oils;
- trading: distribution and trading of electricity and heat, wholesale and retail sale of fuel products, petrochemicals, chemicals and other products, sale and distribution of gaseous and liquid fuels;
- service activities, including crude oil and fuel storage, transport, maintenance and overhaul services, laboratory services, security, design, administrative and courier services, insurance and financial services, press distribution, and media activities (newspapers and websites).

In early 2025, we presented our updated business strategy ORLEN 2035, which establishes strategic priorities across four key operating segments: Upstream & Supply, Downstream, Energy, Consumers & Products. Consequently, we made a corresponding change to the presentation of the ORLEN Group operating segments in reporting. The new segments reflect the current management model, which is aligned with key trends and with the decision-making structure that has been in place at the Group since 2025. The changes will result in providing more relevant and reliable information, giving a clearer reflection of our performance and business outcomes. Their main purpose was to enhance the usefulness, transparency, clarity and comparability of the Group's financial statements. The changes address investor needs, and are consistent with market practice observed among other global multi-energy groups.

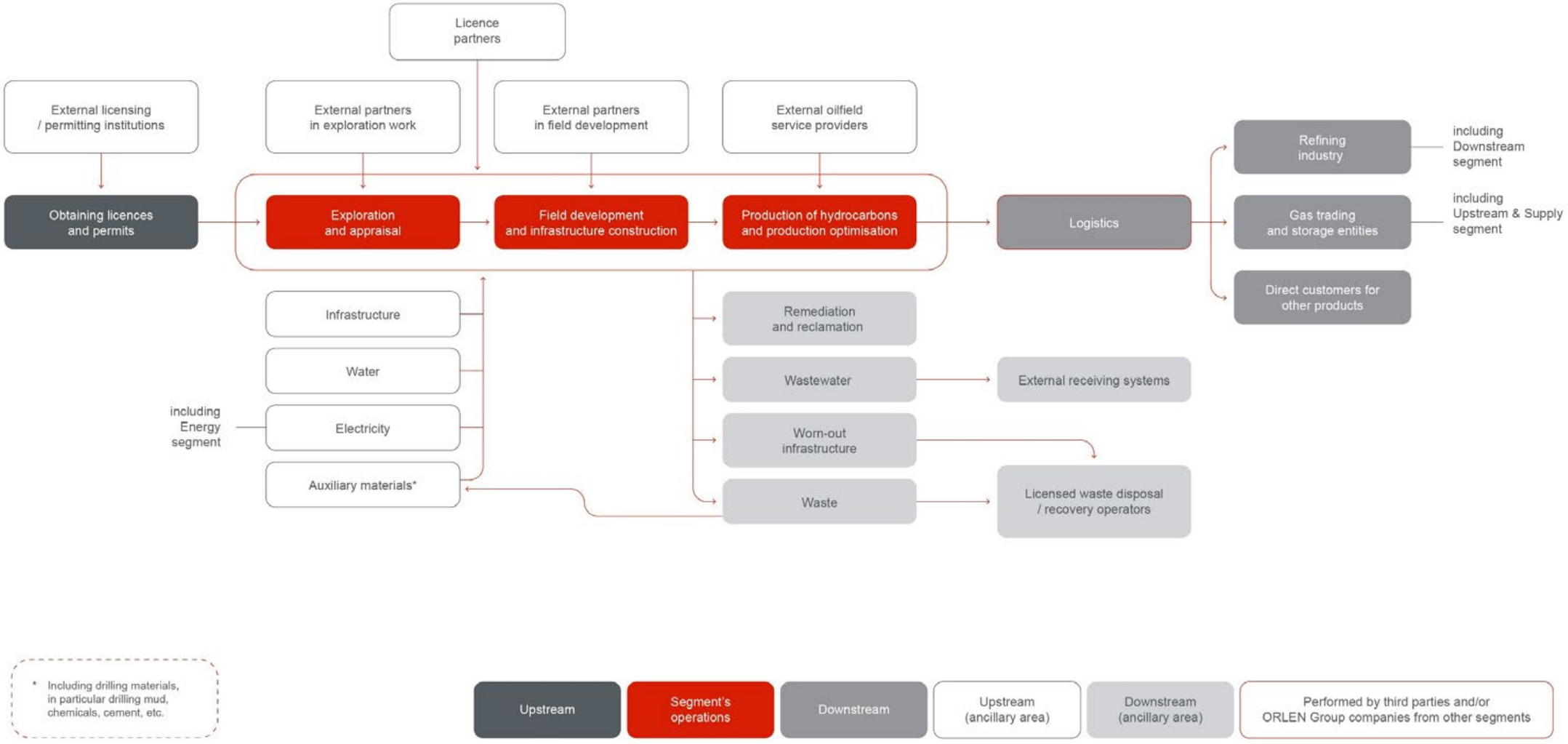
For management purposes, the Group's operations have been divided into four operating segments since 2025:

- Upstream & Supply: domestic and international production, involving exploration for and production of mineral resources such as natural gas and crude oil, drilling and oilfield services (upstream), wholesale of crude oil and wholesale of gas;
- Downstream: refining production, petrochemical production, wholesale of refined products, wholesale of petrochemical products, maintenance services (in refining and petrochemical production assets), hydrogen;
- Energy: conventional power, new energy, heat, distribution of electricity and gas, trading in electricity, energy services;
- Consumers & Products: retail sale of fuels, retail sale of electricity and gas, retail services, e-mobility.

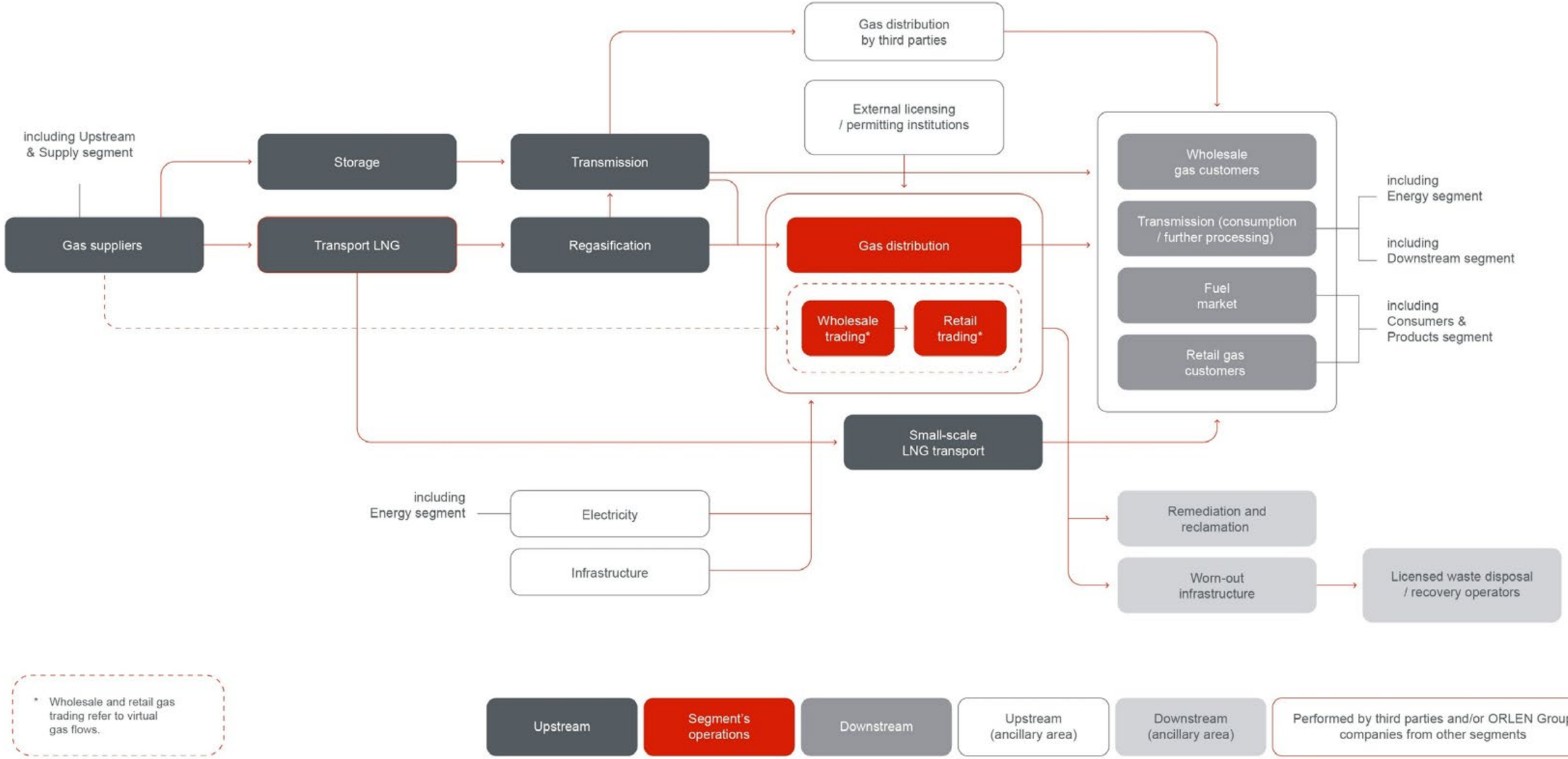
The Corporate Functions segment includes management, administrative and other activities not allocated to any of the identified operating segments. The Corporate Functions area provides support to other business segments.

Figure 13 Value chain by segment

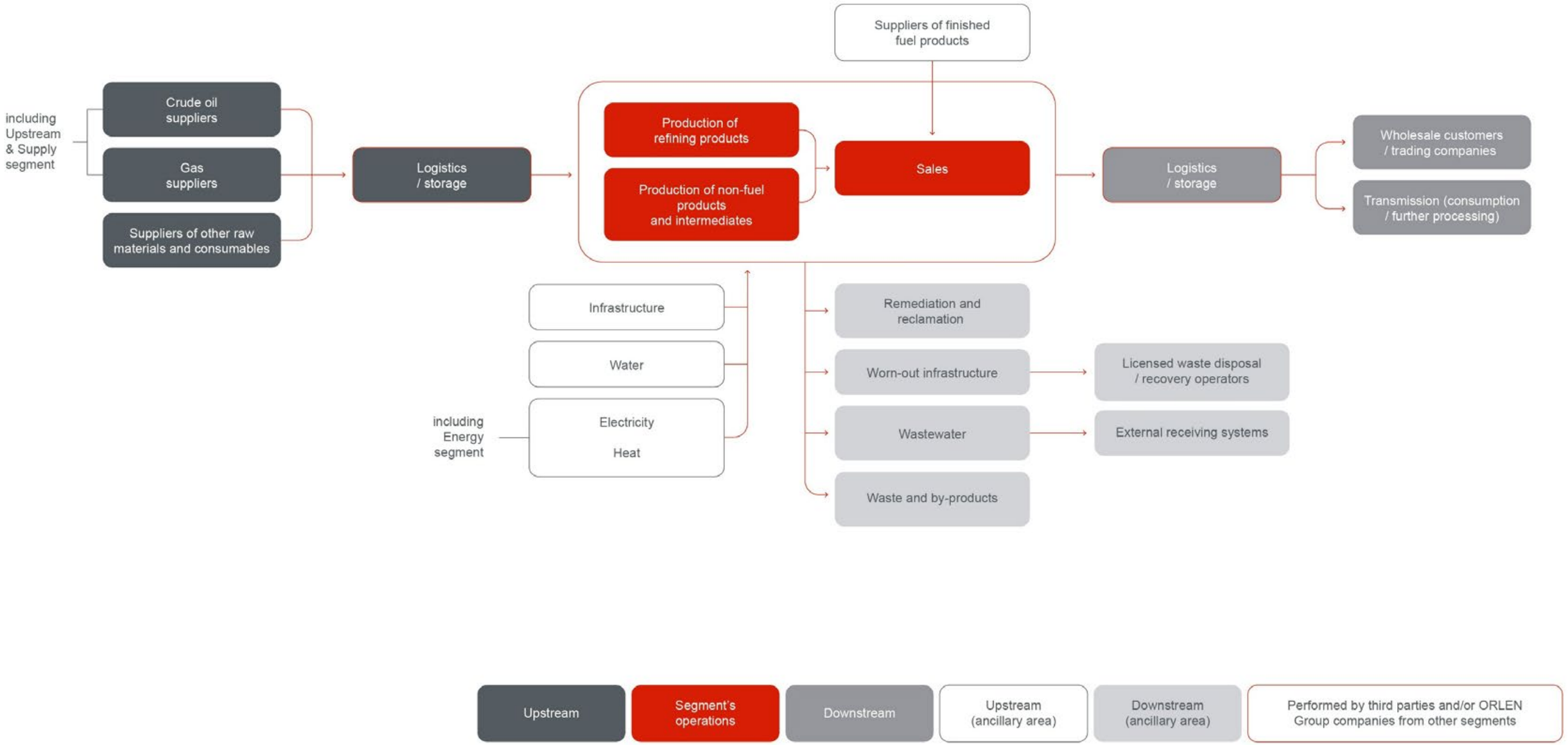
## Upstream & Supply – Upstream



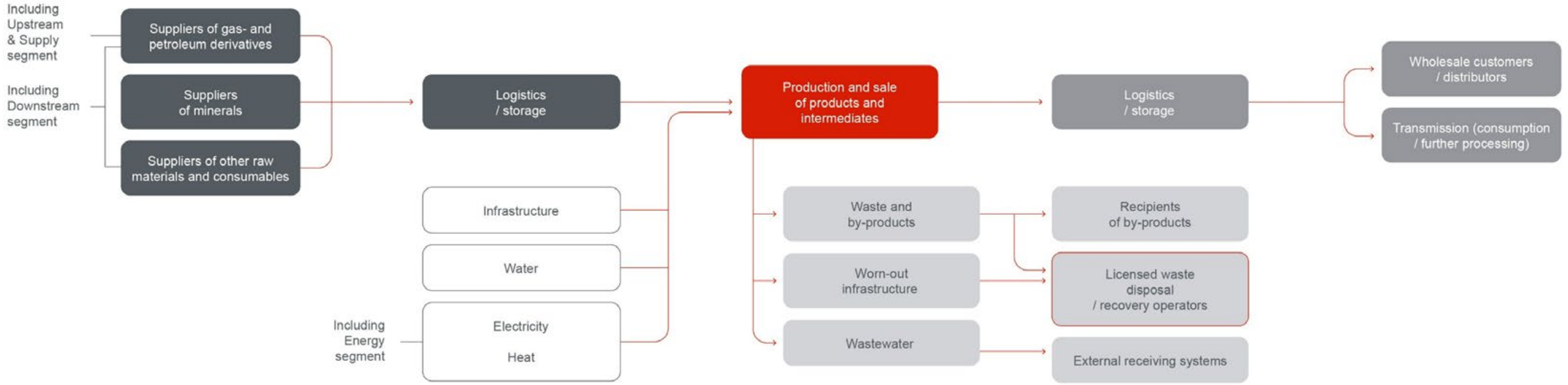
## Upstream & Supply – Gas



## Downstream – Refining

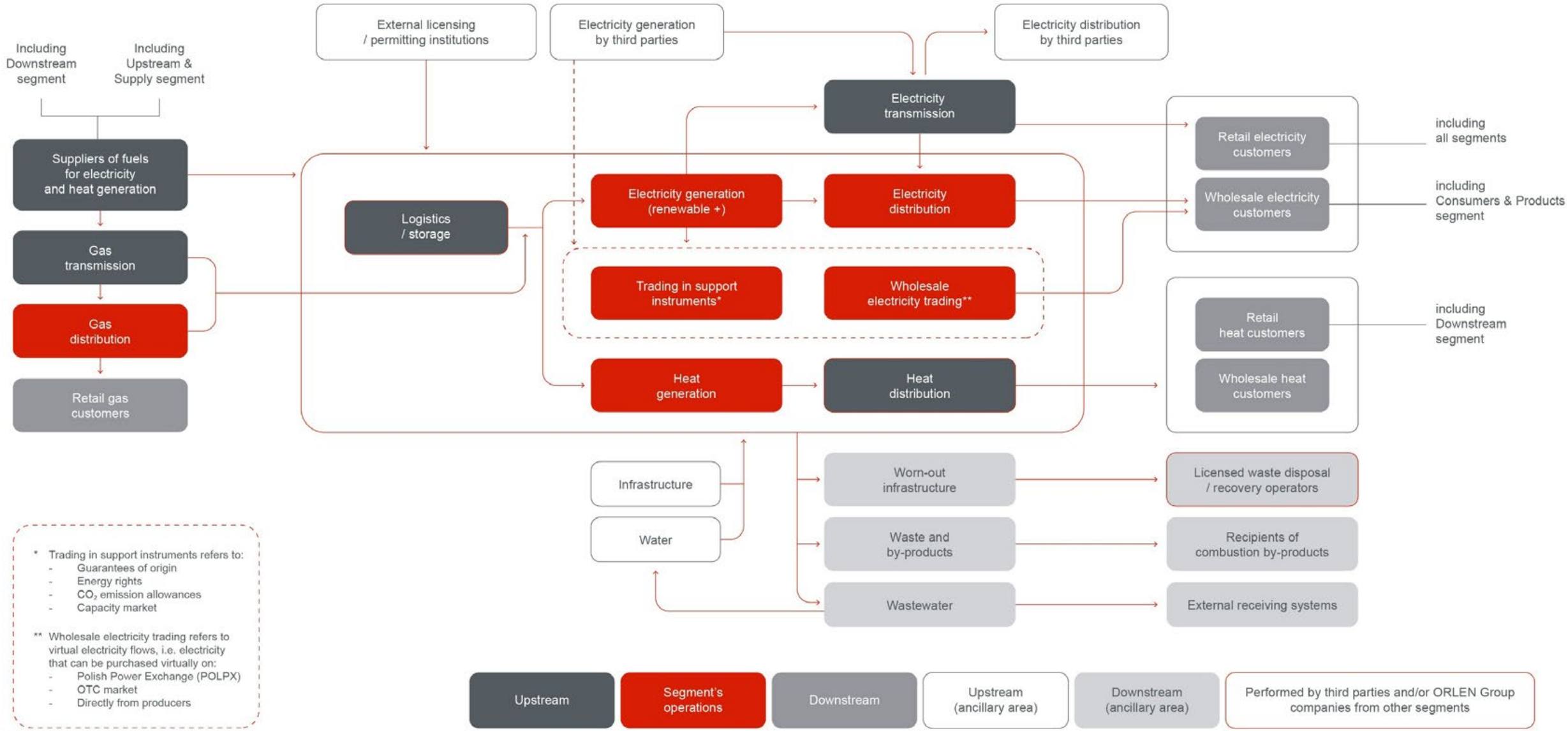


## Downstream – Petrochemicals

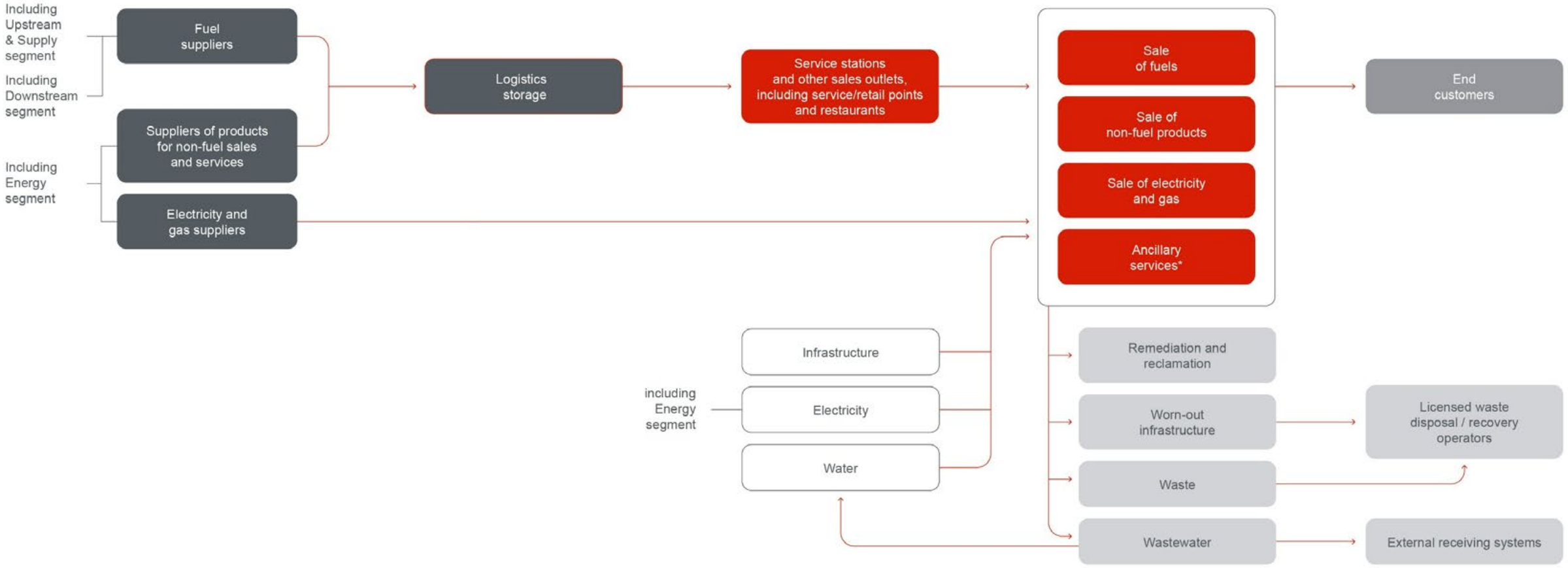



Upstream | Segment's operations | Downstream | Upstream (ancillary area) | Downstream (ancillary area) | Performed by third parties and/or ORLEN Group companies from other segments

## Energy


Including Downstream segment
Including Upstream & Supply segment
External licensing / permitting institutions
Electricity generation by third parties
Electricity distribution by third parties
Electricity transmission
Suppliers of fuels for electricity and heat generation
Gas transmission
Gas distribution
Retail gas customers
Logistics / storage
Electricity generation (renewable +)
Electricity distribution
Trading in support instruments*
Wholesale electricity trading**
Heat generation
Heat distribution
Retail electricity customers
Wholesale electricity customers
including all segments
including Consumers & Products segment
Retail heat customers
Wholesale heat customers
including Downstream segment
Infrastructure
Water
Worn-out infrastructure
Waste and by-products
Wastewater
Licensed waste disposal / recovery operators
Recipients of combustion by-products
External receiving systems
* Trading in support instruments refers to:
- Guarantees of origin
- Energy rights
- $CO_2$ emission allowances
- Capacity market
** Wholesale electricity trading refers to virtual electricity flows, i.e. electricity that can be purchased virtually on:
- Polish Power Exchange (POLPX)
- OTC market
- Directly from producers
Upstream
Segment's operations
Downstream
Upstream (ancillary area)
Downstream (ancillary area)
Performed by third parties and/or ORLEN Group companies from other segments

## Consumer & Products



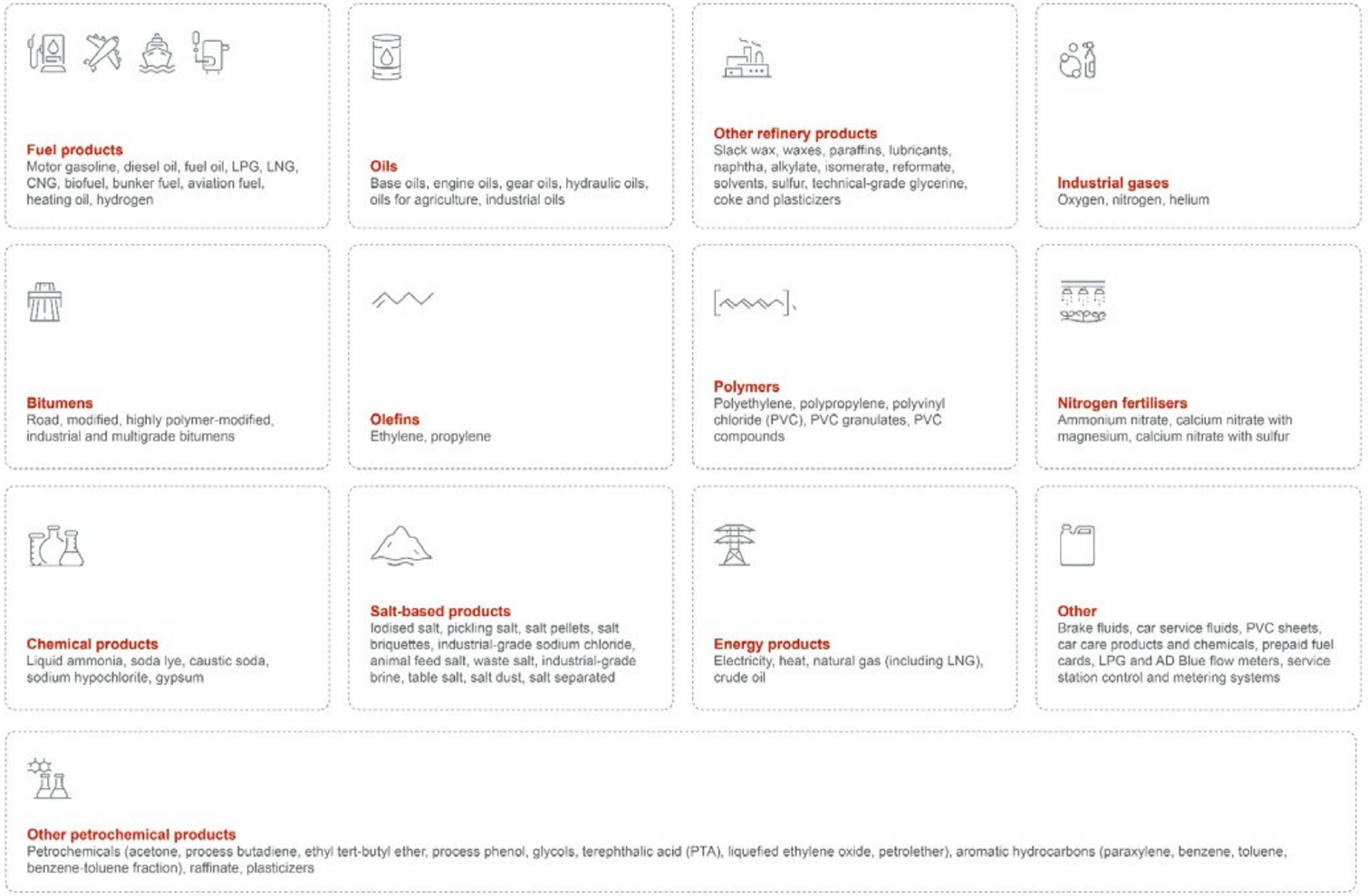

* car washes, EV charging stations, replacing coal stoves with gas, heat pumps, energy performance contracting, solar PV systems, demand-side response, energy storage, Insurance, etc.

Upstream | Segment's operations | Downstream | Upstream (ancillary area) | Downstream (ancillary area) | Performed by third parties and/or ORLEN Group companies from other segments

For a detailed description of each segment, see Section 4 of the Management Board's Report.

## Significant groups of products and/or services offered

The ORLEN Group is Central Europe's leading manufacturer of petrochemicals, supplying products to customers in nearly 100 countries across six continents. Our portfolio includes both basic and specialty products.



## Number of employees by contract type and region

Table 43 Headcount by geographical area

| Employee relations KPIs | UoM | ORLEN Group | | ORLEN | |
|---|---|---|---|---|---|
| | | 2025 | 2024 | 2025 | 2024 |
| **Employees by type of contract and region, including:** | | **66,563** | **67,809** | **13,641** | **13,361** |
| **Open-ended contract** | | **59,609** | **60,330** | **11,901** | **11,465** |
| Czech Republic | [number] | 4,648 | 5,221 | 0 | 0 |
| Canada | [number] | 47 | 40 | 0 | 0 |
| Germany | [number] | 311 | 316 | 0 | 0 |
| Lithuania | [number] | 2,242 | 2,326 | 0 | 0 |
| Poland | [number] | 51,089 | 50,660 | 11,774 | 11,319 |
| Other | [number] | 1,272 | 1,767 | 127 | 146 |
| **Fixed-term contract** | | **5,648** | **6,239** | **1,529** | **1,682** |
| Czech Republic | [number] | 465 | 584 | 0 | 0 |
| Canada | [number] | 0 | 0 | 0 | 0 |
| Germany | [number] | 2 | 3 | 0 | 0 |
| Lithuania | [number] | 75 | 42 | 0 | 0 |
| Poland | [number] | 5,045 | 5,509 | 1,519 | 1,664 |
| Other | [number] | 61 | 101 | 10 | 18 |
| **Probationary period contract** | | **937** | **892** | **152** | **150** |
| Czech Republic | [number] | 65 | 78 | 0 | 0 |
| Canada | [number] | 0 | 1 | 0 | 0 |
| Germany | [number] | 2 | 3 | 0 | 0 |
| Lithuania | [number] | 53 | 35 | 0 | 0 |
| Poland | [number] | 772 | 731 | 152 | 150 |
| Other | [number] | 45 | 44 | 0 | 0 |
| **Temporary substitution** | | **369** | **348** | **59** | **64** |
| Czech Republic | [number] | 1 | 2 | 0 | 0 |
| Canada | [number] | 0 | 0 | 0 | 0 |
| Germany | [number] | 3 | 0 | 0 | 0 |
| Lithuania | [number] | 0 | 4 | 0 | 0 |
| Poland | [number] | 365 | 342 | 59 | 64 |
| Other | [number] | 0 | 0 | 0 | 0 |

## Significant markets and/or customer groups served

For detailed information on the ORLEN Group's key markets in 2025, see Note 1 to the consolidated financial statements for 2025.

## Statement on the conduct of activities in specific sectors and the related revenues

For detailed information on revenue earned by the ORLEN Group in high climate impact sectors in 2025, see Note 11.1 to the consolidated financial statements for 2025. We have assumed that all ORLEN Group companies operate in high climate impact sectors.

The ORLEN Group does not conduct any activities related to chemical production, i.e. its activities do not fall under division 20.2 of Annex I to Regulation (EC) No 1893/2006. Furthermore, the Group does not engage in any activities related to controversial weapons or the cultivation and production of tobacco.

### 6.1.9 Sustainable Development Strategy

## ORLEN Group Sustainable Development Strategy for 2025–2035

In 2025, following an update to our business strategy and the extension of its time horizon to 2035, we also revised the ORLEN Group Sustainable Development Strategy.

The ORLEN Group Sustainable Development Strategy is a comprehensive framework guiding our development and operations in line with sustainability principles. It is structured around five core pillars: Climate, Environment, Employees, Communities, and Governance. The pillars are further broken down into 18 streams, each with targets set across three time horizons: a short-term horizon to 2026, a medium-term horizon to 2030, and a long-term horizon beyond 2035. The updated ORLEN Group Sustainable Development Strategy for 2025–2035, published in March 2025, builds on and replaces the earlier 2024–2030 version.

The Sustainable Development Strategy addresses the most pressing market and regulatory challenges of today, focusing on climate change, environmental protection, biodiversity protection, social relations, and the geopolitical and economic landscape. Its objectives align directly with the UN Sustainable Development Goals (SDG), the European Sustainability Reporting Standards (ESRS), and the Ten Principles of the UN Global Compact (UNGC), which the ORLEN Group formally endorsed by joining the initiative in 2024. This approach to strategy development and implementation not only supports a broader commitment to responsible business practices but also ensures detailed and transparent sustainability reporting in line with the CSRD and other regulatory requirements. Reporting on the implementation of the Sustainable Development Strategy – for information on the status of key activities under the Strategy, see sections corresponding to individual ESRSs.

Figure 14 Structure of the ORLEN Group Sustainable Development Strategy for 2025–2035

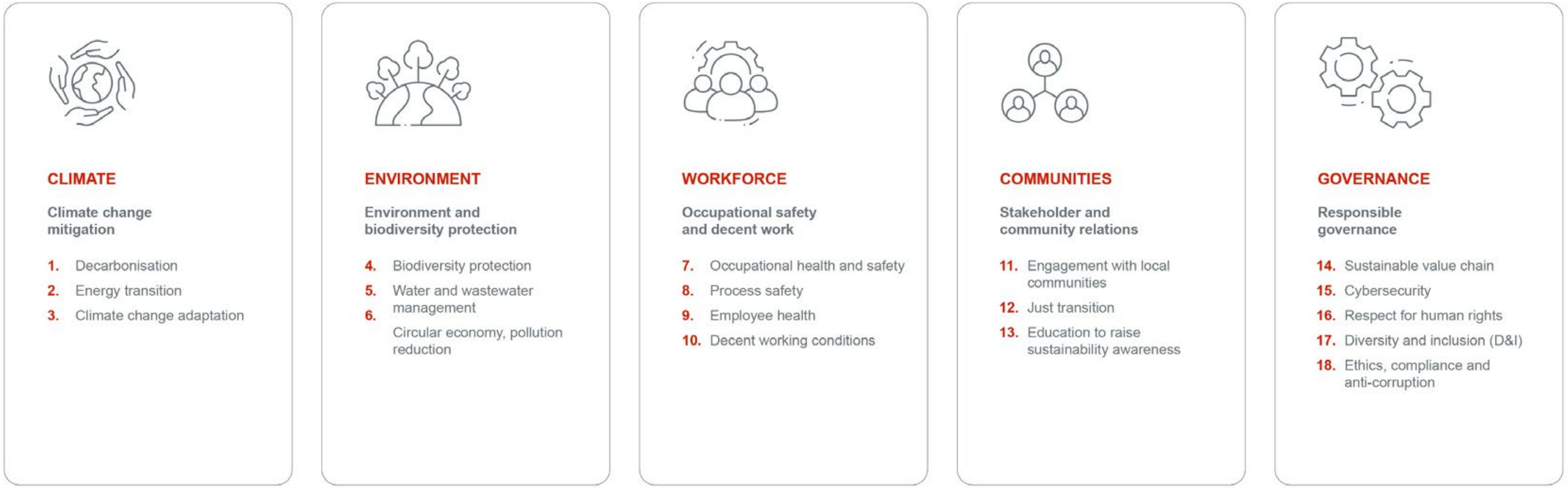


Figure 15 Objectives of the Sustainable Development Strategy

## The CLIMATE pillar:

| | By 2026 | By 2030 | Ambitions for 2035 and beyond: |
|---|---|---|---|
| **1. Decarbonisation[1]** | • Implement fugitive methane emissions measurement and monitoring systems across upstream assets operated by ORLEN<br>• Develop guidelines to set decarbonisation targets for the ORLEN Group's key suppliers | • 13% reduction of absolute Scope 1 and Scope 2 emissions from Refining, Petrochemicals and Upstream<br>• 40% reduction of carbon intensity in Energy<br>• 10% reduction of net carbon intensity<br>• Zero Routine Flaring and Near Zero Methane Emissions across upstream assets operated by ORLEN<br>• Phase-out of coal-fired power generation | • 25% reduction of absolute Scope 1 and Scope 2 emissions from Refining, Petrochemicals and Upstream<br>• 55% reduction of carbon intensity in Energy<br>• 15% reduction of net carbon intensity<br>• Phase-out of coal-fired heat generation<br>• Net Zero – climate neutrality by 2050[2] |
| **2. Energy transition[1]** | • Launch Baltic Power, the pioneer offshore wind project with a capacity of 1.2 GW (jointly with Northland Power)<br>• Roll out a public network of EV chargers | • 9 GW of installed renewable energy capacity<br>• 2.7 thousand EV fast charging points in Poland<br>• 0.8 GW of installed capacity in battery energy storage systems (BESS)<br>• 21.1% share of renewables in fuel mix | • 12.8 GW of installed renewable energy capacity<br>• 1.4 GW of installed capacity in battery energy storage systems (BESS)<br>• 6 thousand EV fast charging points in Poland<br>• 0.6 GW of installed capacity in small modular reactors (SMR) |
| **3. Climate change adaptation** | • Prepare adaptation plans addressing key threats relevant to the ORLEN Group's assets | • Implement and regularly update adaptation plans addressing key threats relevant to the ORLEN Group's assets | • Develop a fully integrated climate resilience system, incorporating infrastructure projects and innovative technologies designed to mitigate climate change impacts on our operations and local communities |

## The ENVIRONMENT pillar:

| | By 2026 | By 2030 | Ambitions for 2035 and beyond: |
|---|---|---|---|
| **4. Biodiversity protection** | • Develop the Biodiversity Action Plan (BAP) for the ORLEN Group, including:<br>  • Calculation of ORLEN S.A.'s biodiversity footprint<br>  • Consistent integration of biodiversity protection into the ORLEN Group's internal strategic and decision-making processes | • Implement BAP across the ORLEN Group<br>• Avoid siting new infrastructure projects within areas covered by special protection measures<br>• Develop a Net Zero Deforestation Policy for the ORLEN Group | • Digitalisation of environmental monitoring across key assets and further reduction of adverse environmental impacts<br>• Regular review of the Biodiversity Action Plan (BAP) and continued measures to prevent biodiversity loss and contribute to biodiversity restoration<br>• Net Positive Impact on biodiversity for new assets – 2050 |
| **5. Water and wastewater management** | • Take steps to optimise fresh water consumption and wastewater management, including:<br>  • Calculation of ORLEN S.A.'s water footprint<br>  • Development of the Water and Wastewater Policy for the ORLEN Group | • Calculate the ORLEN Group's water footprint<br>• Improve efficiency of the operational use of fresh water and the management of wastewater based on the Water and Wastewater Policy data<br>• Develop plans to replenish water resources in water stress areas where we operate | • Continue and further develop protection of water resources in areas where we operate |
| **6. Circular economy, pollution reduction** | • Consistently expand mechanical and chemical recycling capacities<br>• Develop the ORLEN Group Circular Economy Policy<br>• Secure ISCC+ certification for key petrochemicals<br>• Develop plans for a closed loop water system, including rainwater retention<br>• Launch a programme to reduce food waste within the retail network<br>• Maximise utilisation of combustion by-products in the Energy segment | • Expand mechanical and chemical recycling capacities to 150,000 tonnes<br>• Achieve 8% share of sales of products based on renewable and circular feedstocks<br>• Disposal and management of hazardous waste, including:<br>  • Construction of a dedicated facility to dispose of hazardous substances (including waste of medical and veterinary origin)<br>  • Construction of a facility to recycle waste energy storage units, wind turbines and PV panels<br>• Optimise $SO_2$, NOx, particulate matter and other pollutant emissions at the ORLEN Group | • Achieve 10% share of sales of products based on renewable and circular feedstocks<br>• Expand mechanical and chemical recycling capacities to 250,000 tonnes |

## The EMPLOYEES pillar:

| | By 2026 | By 2030 | Ambitions for 2035 and beyond: |
|---|---|---|---|
| **7. Occupational health and safety** | • Stabilise and consistently reduce TRIR (≤ 0.2)<br>• Enhance occupational safety systems for employees and contractors within ORLEN Group companies | • Continue to consistently reduce the TRIR target level<br>• Implement the OHS segmental management policy across the ORLEN Group | • Drive continual advancement of occupational safety standards and adapt them to dynamic technological changes and energy transition processes<br>• Implement advanced AI-powered hazard prediction systems to minimise the risk of workplace accidents<br>• Foster ongoing strengthening of safety culture through educational programmes for employees and contractors, promoting awareness, and a proactive approach to occupational health and safety |
| **8. Process safety** | • Implement the guidelines outlined in the Declaration on Prevention of Major Industrial Accidents across the ORLEN Group | • Advance and fine-tune the fire safety and process safety segmental management system within the ORLEN Group | • Maintain global process safety standards, including the integration of modern risk monitoring tools<br>• Continuously support innovative technologies designed to prevent industrial accidents and mitigate their impacts across the value chain<br>• Develop cooperation networks with external partners to share process safety knowledge and best practices |
| **9. Employee health** | • Introduce health programmes for all ORLEN Group employees, covering both physical and mental well-being, including:<br>  ◦ A psychoeducational programme and psychological support for employees<br>  ◦ A wide range of disease prevention projects | • Continue to develop health promotion activities, tailor projects to current needs of ORLEN Group employees | • Provide ongoing comprehensive support for employee well-being, including health and mental well-being initiatives, together with a holistic approach to work–life balance<br>• Continue to implement personalised preventive health programmes tailored to employees' evolving demographic needs |
| **10. Decent working conditions** | • Grow employee satisfaction/engagement levels<br>• Expand the employee development training portfolio<br>• Expand the mentoring programme for employees<br>• Expand the selection of non-pay benefits for employees | • Continue to develop initiatives to align with the current needs of our employees | • Maintain the employer-of-choice status by developing flexible working models tailored to employees' individual needs<br>• Continue investing in employee skills development, including through modern training and mentoring programmes |

## The COMMUNITIES pillar:

| | By 2026 | By 2030 | Ambitions for 2035 and beyond: |
|---|---|---|---|
| **11. Community engagement** | • Implement a comprehensive local community communication system by:<br>  • Developing the Local Community Ombudsman role<br>  • Developing and promoting a system to manage issues submitted by local communities<br>  • Updating the ORLEN Group Community Relations Management Policy<br>• Develop the ORLEN for Science, ORLEN for Culture, ORLEN for Sports and ORLEN as a Good Neighbour programmes | • Standardise the comprehensive local community engagement system across the ORLEN Group<br>• Review the various channels for local community engagement at ORLEN Group companies<br>• Implement a coherent local community engagement system and a local community feedback management system for ORLEN Group companies<br>• Continue the ORLEN for Science, ORLEN for Culture, ORLEN for Sports and ORLEN as a Good Neighbour programmes and adapt them to address evolving community needs. | • Achieve full implementation of a standardised local community relations management system across the ORLEN Group, also in foreign markets<br>• Conduct regular evaluations and make adjustments to community programmes to respond to the local communities' evolving needs and expectations; develop long-term partnerships and promote best practices in stakeholder dialogue |
| **12. Just transition** | • Develop a Just Transition Programme by:<br>  • Analysing and identifying the needs of residents in areas affected by the energy transition<br>  • Defining objectives of the Just Transition Programme for key areas that require support: our workforce, local communities, business partners, and customers<br>• Build an offering to support the transition of Polish cities and municipalities through the ORLEN for Cities initiative | • Implement the Just Transition Programme, including:<br>  • Roll-out of the programme for key areas that require support: our workforce, local communities, business partners, and customers<br>  • Broadening of the programme in selected locations where ORLEN Group companies operate<br>• Define the objectives for reskilling and upskilling programmes, and support the development of competence centres for jobs of tomorrow related to the energy transition<br>• Continue to develop the ORLEN for Cities initiative in line with local needs | • Continue to develop comprehensive reskilling and upskilling programmes and competence centres for jobs of tomorrow related to the energy transition<br>• Continue to develop the Just Transition Programme, incorporating cross-sector collaboration |
| **13. Education to raise sustainability awareness** | • Integrate sustainability principles into the core programmes addressed to our customers, workforce, children and youth, and local communities,<br>• Deliver dedicated sustainability awareness campaigns<br>• Implement an environmental protection programme involving collaboration between corporate foundations and representatives of communities in areas of high natural value | • Run campaigns advocating for sustainable lifestyles, incorporating social contribution projects that expand existing inclusivity practices<br>• Implement an environmental conservation programme, including forging partnerships to support the cause<br>• Develop educational programme across all levels, from pre-school to higher education, integrating content on sustainability and emerging technologies | • Reinforce partnerships with national and international educational institutions to develop innovative academic programmes focused on the circular economy and the energy transition<br>• Expand digital learning platforms that promote sustainability knowledge and are generally accessible to our workforce, stakeholders, and local communities |

## The GOVERNANCE pillar:

| | By 2026 | By 2030 | Ambitions for 2035 and beyond: |
|---|---|---|---|
| **14. Sustainable value chain** | • Implement a supply chain due diligence system (CSDD)<br>• Evaluate key suppliers for compliance with the Supplier Code of Conduct in their sustainability practices<br>• Conduct sustainability training for key stakeholders | • Consistently refine the supply chain due diligence process<br>• Develop and implement a supplier risk management system | • Continue to promote sustainability among internal and external stakeholders |
| **15. Cybersecurity** | • Implement a centralised cybersecurity management model at the ORLEN Group strategic companies | • Implement a centralised cybersecurity management model within the ORLEN Group's value chain | • Continuously enhance the cybersecurity of the Group's assets and improve effective management of the ORLEN Group's centralised cybersecurity model |
| **16. Respect for human rights** | • Implement a human rights due diligence system across the ORLEN Group<br>• Implement a Human Rights Policy across all ORLEN Group companies and foster employee awareness in the area of the protection of human rights and the rights of children (Charter on the Rights of Children in Business) | • Continue to collaborate with partners to minimise adverse impacts of human rights infringements<br>• Continue to collaborate with ORLEN Group companies on implementation of the Human Rights Policy and employee education in this area | • Continue consistent efforts promoting respect for human rights and ethical standards in all areas of our operations and in the value chain |
| **17. Diversity and inclusion** | • Promote the empowerment of women in business, including in managerial positions at the ORLEN Group, by:<br>  ◦ Developing and implementing of a career development programme for ORLEN S.A. employees: ORLEN Women Forward – The Power of Diversity<br>  ◦ Developing and implementing the Gender Balance Policy for the supervisory and management bodies of ORLEN Group companies<br>• Provide education on the prevention of workplace bullying and discrimination<br>• Educate employees on the management of equity, diversity and inclusion (EDI) | • Continue to foster the empowerment of women in business, including in managerial positions at the ORLEN Group, by:<br>  ◦ Implementing employee career development programmes, including gender parity quotas, at the ORLEN Group<br>• Consistently expand and promote equity, diversity and inclusion | • Continually promote a culture of diversity and inclusion, creating a working environment that supports equal opportunities and respect for all |
| **18. Ethics, compliance and anti-corruption** | • Implement a Whistleblowing Policy across the ORLEN Group<br>• Implement an anti-corruption awareness programme<br>• Implement a trading partner ethical compliance assessment process<br>• Continue to implement a coherent Compliance System at the ORLEN Group, along with an employee awareness programme<br>• Implement a uniform Code of Ethics at ORLEN Group companies | • Ensure uniform anti-corruption standards across the ORLEN Group<br>• Implement a Responsible Communication Code at the ORLEN Group<br>• Cooperate with ORLEN Group companies on the application of the Code of Ethics and employee education in this area | • Develop transparent stakeholder communication by expanding the scope of non-financial reporting |

Within the Climate pillar, the key focus areas include decarbonisation and energy transition. We have set targets for investments in renewable energy sources, such as the Baltic Power offshore wind farm, and in bio-gas and bio-fuels production, as well as greenhouse gas emission reduction targets for 2030 and 2035 (2019 baseline), as part of the pathway to achieving net zero by 2050:

- a 13% reduction in absolute emissions in Oil & Gas (Scopes 1 and 2) by 2030, rising to 25% by 2035;
- a 40% reduction in Scope 1 GHG emissions intensity in the Energy segment by 2030, rising to 55% by 2035;
- a 10% reduction in Net Carbon Intensity (NCI) of the Group's energy products by 2030, rising to 15% by 2035.

One of our most significant commitments is the complete phase-out of coal-fired power generation by 2030, followed by the phase-out of coal from heat generation by 2035. By 2030, we also intend to achieve two dedicated targets in the upstream operations – Near-Zero Upstream Methane Emissions and Zero Routine Flaring. For more details on the decarbonisation objectives, see the ORLEN Transition Plan.

Under the Environment pillar, we focus on minimising the adverse environmental impacts of our operations and preventing biodiversity loss. The core ambitions under the biodiversity protection stream are to develop and implement a Group-wide Biodiversity Action Plan (BAP). Another important element is sustainable water and wastewater management, where we intend to develop a water and wastewater policy and calculate the Group's water footprint. We also plan to implement closed-loop water systems, e.g. by upgrading car washes at service stations, not only to reduce the volumes of water used, but also to cut down on the consumption of chemical agents. A separate stream within the Environment pillar is focused on advancing the circular economy and abating pollution. Its key targets include drawing up a circular economy policy and developing recycling operations.

Under the Employees pillar, targets have been established to further minimise workplace accidents within the ORLEN Group (the 2030 target is Total Recordable Incident Rate < 0.2), alongside the implementation of uniform Group-wide occupational health, safety, and process safety standards. Another major focus area is employee well-being. We intend to continue and expand our portfolio of professional advancement programmes to support skills development, as well as initiatives promoting both physical and mental health. Our efforts were recognised in the prestigious Top Employer 2026 ranking, published annually by the Top Employers Institute. ORLEN has consistently ranked among Poland's best employers for the past 15 years, and one of our core ambitions for the years ahead is to maintain our position among the region's leading employers.

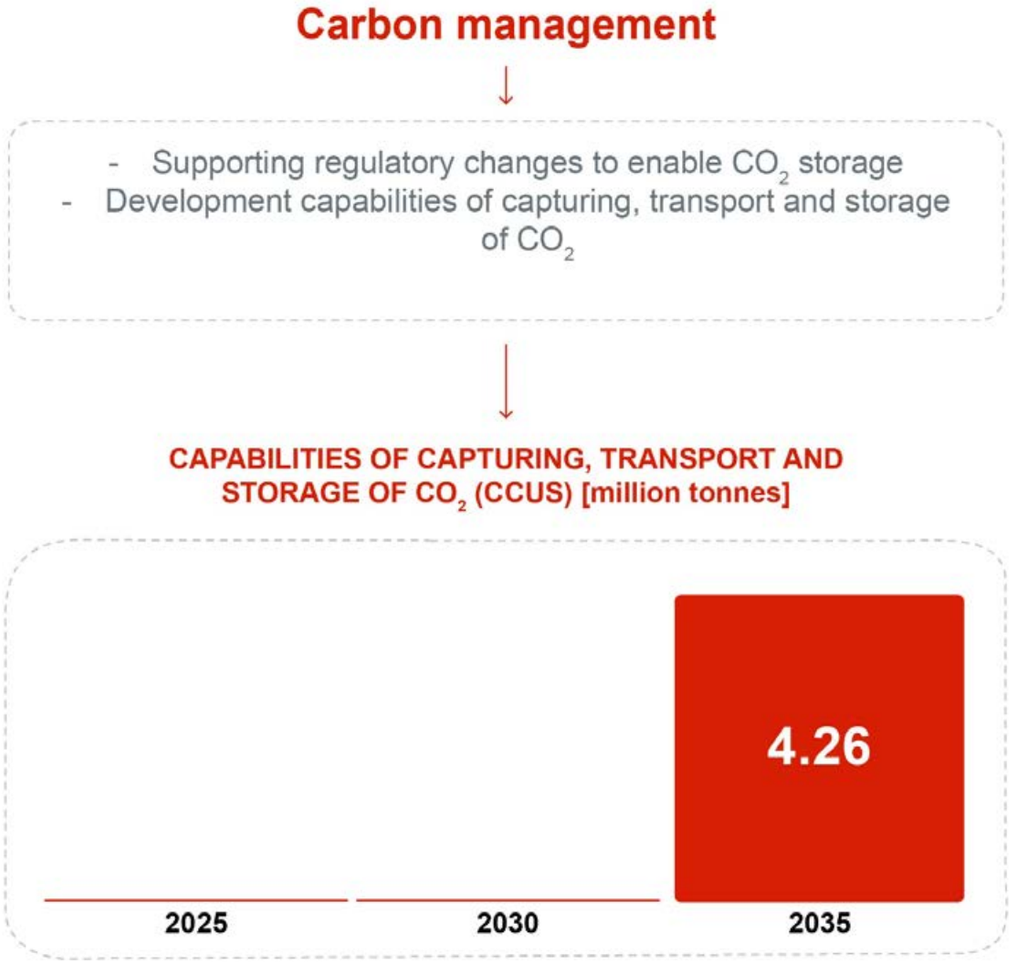
The Communities pillar is particularly important due to our significant impacts on the populations in the areas where we operate. The portfolio of initiatives that support and engage local communities will be further developed. A key objective is to draft and implement a just transition programme designed to protect communities in regions affected by the energy transition. Another objective is to establish a more structured approach to local community engagement. To this end, a Local Community Ombudsman has been appointed as a dedicated contact for submitting suggestions, feedback, or complaints.

The last pillar, which integrates all other pillars, is Governance. Our initiatives in this area included the development of due diligence objectives for human rights and environmental protection, spanning the whole ORLEN Group value chain. Other Governance goals include harmonising standards on ethics, anti-corruption, and human rights across the ORLEN Group, and putting in place a centralised cybersecurity governance model. We will continue and expand our array of training programmes dedicated to fostering diversity and equal opportunities throughout the organisation. A key initiative is Orlen Women Forward – The Power of Diversity, aimed at promoting diversity and empowering women at all career levels.

## Key elements of the ORLEN Group strategy that relate to sustainability matters

The key strategic priorities defined in the ORLEN 2035 Strategy are presented below.

### Upstream and Supply



## Downstream: Transformation of the Refining business

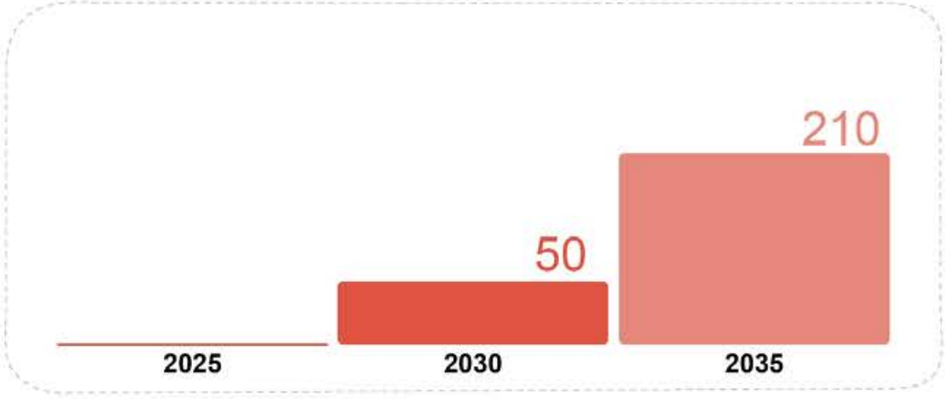
**Decarbonisation of** Downstream

- Biofuels and e-fuels production optimised for decarbonisation, regulations and market demand
- Building partnerships to cover demand for bio-feedstock
- Integration of the organisation for the purpose of comprehensive alternative fuels development

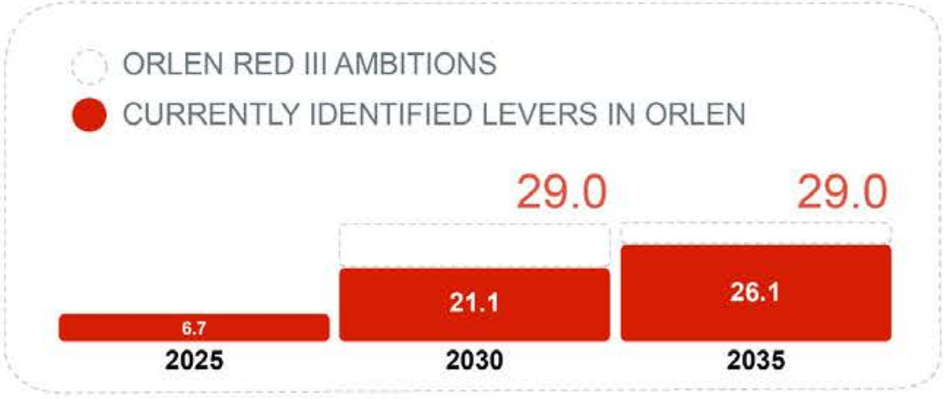
Leading **low-carbon fuels** supplier in the region

- Decreasing emissions of power and heat generation for refinery production purposes - use of energy from low- and zero emission sources at refinery and petrochemicals plants
- Use of renewable and low emission hydrogen to reduce carbon footprint of fuels

**LOW-CARBON AND RENEWABLE $H_2$ FOR REFINERY PRODUCTION (thousand tonnes)**




**SHARE OF RENEWABLE ENERGY IN ORLEN FUEL MIX [%]**

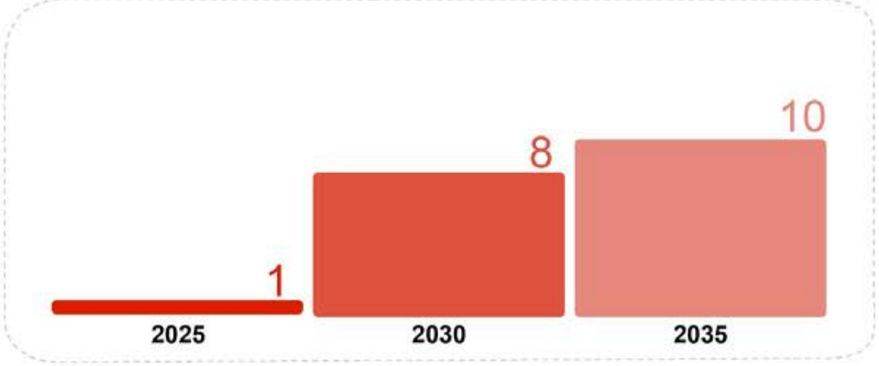


## Downstream: Petrochemicals

### Portfolio optimisation
and stable supply in the local market

- Strategic review of petrochemical assets in light of challenging economic conditions in the segment, including investment in New Chemicals project
- Guaranteeing stable product supply to ORLEN customers in the region
- Capitalizing on R&D and technical capabilities to provide superior products to customers

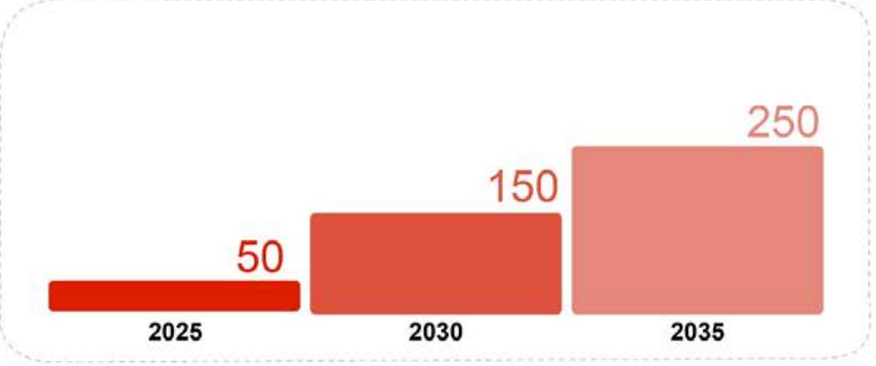
**PRODUCT SALES BASED ON CIRCULAR AND RENEWABLE FEEDSTOCKS [%]**




### Portfolio of sustainable products and building feedstock flexibility
to maximise margins

- Increasing share of circular and renewable products in petrochemical portfolio and capitalising on recycled content premiums
- Expanding mechanical and chemical recycling capacity
- Increasing share of light feedstocks in virgin production and securing supply chains
- Strategic partnerships in recycling value chain to secure feedstocks

**RECYCLING CAPACITY [thousand tonnes]**

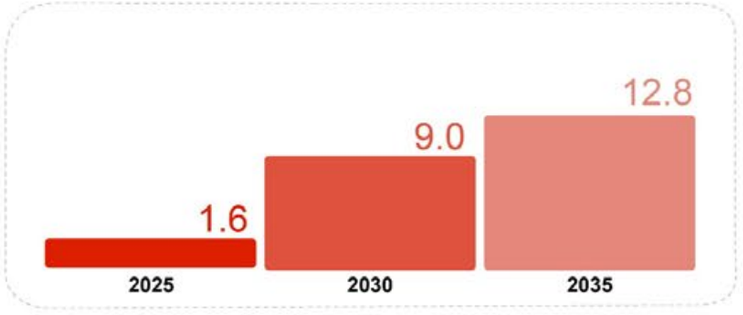


## Energy: Renewables

### Ambitious development of RES
through portfolio consisting of onshore and offshore assets in Poland and abroad

- Enabling decarbonisation of power, industry and transport sectors through delivery of green electrons
- Completion of Baltic Power and further development of a offshore wind portfolio
- Active development of onshore wind and PV in in Poland and abroad
- Partnerships in order to mitigate risk for the involved capital

RES INSTALLED CAPACITY [GW]



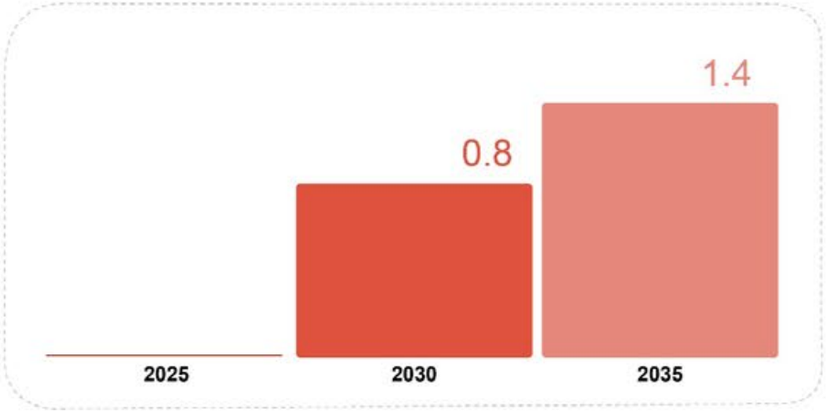

### Integration and digitalization
of Energy segment

- Integration of trading functions and development of in-house capabilities in trading
- Digitisation of the power segment, including the development of the Virtual Power Plant project to faciliate integrated asset management

### Balancing energy production by BESS development

- ORLEN's involvement in the active development of energy storage (BESS) in Poland and the CEE region to maximise the value of the RES portfolio

BESS INSTALLED CAPACITY [GW]

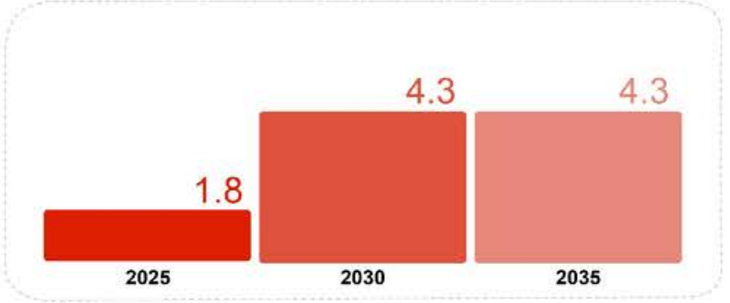


## Energy: Low-carbon generation technologies

### Support of **stability of energy system** through zero and low-carbon power generation sources

- Support for energy system transition with 4.3 GW of gas power plants
- Use of CCGTs and nuclear power plants as technologies to support stability of energy grid

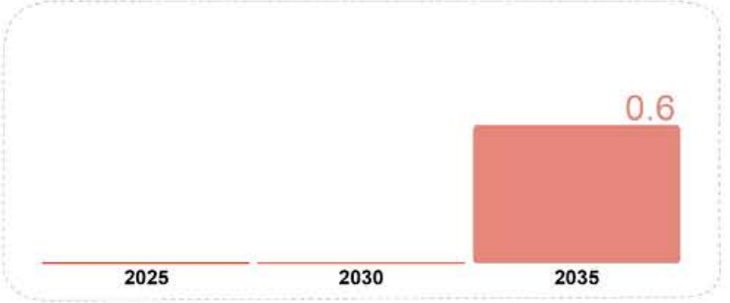
**CCGT INSTALLED CAPACITY [GW]**




### Development of **Small Modular Reactors (SMR)**

- Committed to developing and deploying SMR technology for power, industry and heating requirements
- 0.6 GW of SMR installed capacity in 2035

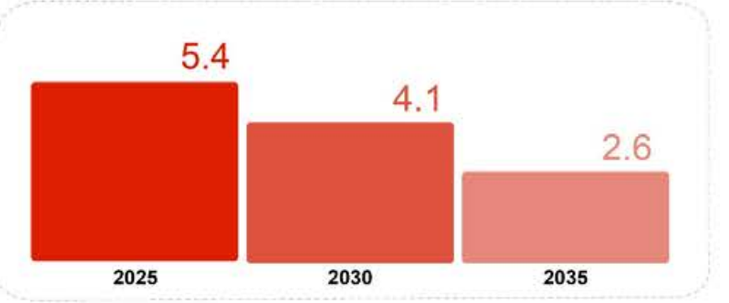
**SMR INSTALLED CAPACITY [GW]**




### **Decarbonisation of district heating** in Poland

- Guaranteeing affordable, low-emission heat
- Investment plan for district heating designed to reduce emissions

**DISTRICT HEATING EMISSIONS [million tonnes $CO_2e$]**

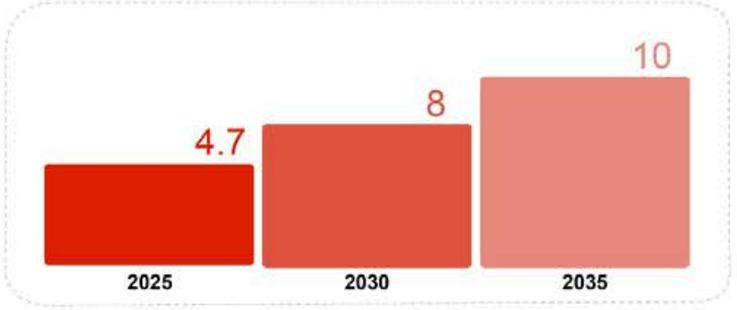


## Consumers & Products

### ORLEN Consumer potential maximisation with **AI powered VITAY platform**

- Creating customer centric organization offering integrated ORLEN product portfolio for at least 10 million users of VITAY programme
- Single point of contact for all Client interactions through VITAY platform based on AI sollutions
- Development of partnerships to enhance VITAY platform offerings and positive customer experience

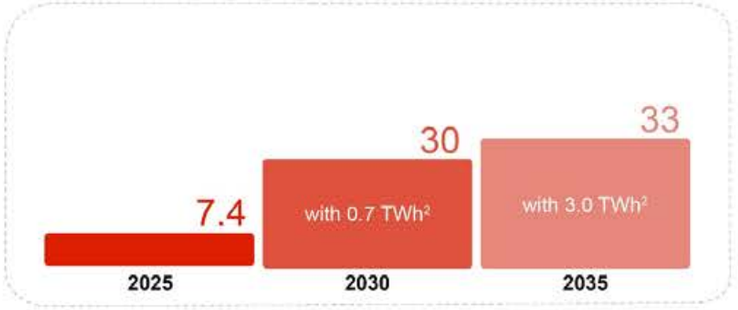
**VITAY PROGRAMME USERS[1] [million]**




### Accelerating Electromobility with over **1 TWh delivered to EVs**

- Adopting #1 position in fast charging market by creating transit and in-city charging hubs for electric vehicles
- Enhancing decarbonization pace by delivering own clean energy to private and public transport

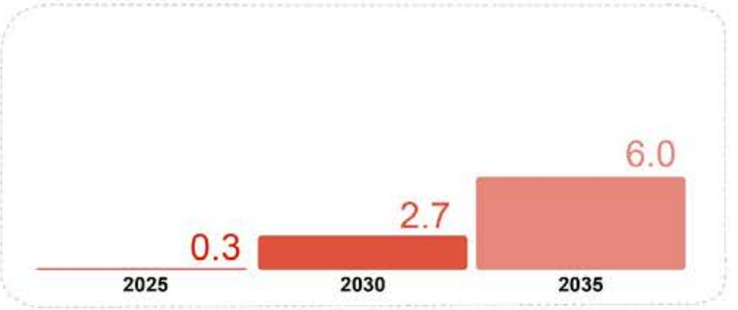
**MARKET SHARE OF ENERGY DELIVERED TO EVS [%]**




### Providing **Energy as a Service** solutions

- Energy as a Service are the combination of products that provide a customised configuration of a set of energy and energy-related products such as electricity, RES installations, energy storage, heat pumps, EV chargers, leveraging the Group's potential and supporting achievement of regulatory objectives[3]

**NUMBER OF ULTRAFAST DC CHARGING POINTS IN POLAND [thousand]**




1. Making at least one transaction per month
2. Total electricity delivered to EVs through public chargers in Poland of which ORLEN aims to achieve 30% market share in 2030 and 33% in 2035.
3. Scenarios of IEA, B2G and B2C

### 6.1.10 Interests and views of stakeholders [SBM-2]

We define a stakeholder as any identifiable group or entity (including an institution or the natural environment) that may influence or be influenced by our operations through our strategies, products, manufacturing processes, management systems and procedures.

Responsibility and dialogue are fundamental to our approach to stakeholder relations. Our commitment to fostering strong relationships is reflected in tailored communication strategies: we select the optimal frequency and suitable channels for particular stakeholder groups, addressing their unique characteristics and current expectations.

We engage in various forms of dialogue, which include:

- recurring, dedicated in-person dialogue sessions conducted as part of the double materiality assessment process (as described in disclosure IRO-1),
- the Local Community Relations Officer inbox,
- dedicated dialogue sessions with local communities around new capital projects,
- meetings with investors,
- B2B customer surveys and enquiries,
- press conferences and meetings with journalists, the Press Office inbox,
- regular employee satisfaction surveys,
- feedback forms for individual customers, for example regarding their experience with service stations,
- social media channels.

Information on stakeholder views and interests gathered as part of engagement with the ORLEN Group stakeholders is taken into account in the development of our strategic directions or business model.

#### Analysis of interests and views of key stakeholders in the context of ORLEN's strategy and business model

We consider stakeholder input in shaping our strategy and in our ongoing business activities. The updated ORLEN Group Sustainable Development Strategy incorporates the outcomes of stakeholder dialogue and the double materiality assessment process. The document is structured around five pillars and 18 streams, and has been intentionally designed to reflect key expectations of stakeholders, including investors, employees and rating agencies, customers, business partners, local communities and other groups relevant to the Company's operations. Matrix analyses, consultations and reported needs have triggered a revision of our sustainability priorities, strengthening elements relating to environmental responsibility and local engagement.

Figure 16 ORLEN Group Stakeholder impact map



The dependency matrix illustrates the level of mutual influence between ORLEN and key stakeholder groups, and forms part of the double materiality assessment process in line with ESRS requirements. Analysis of the matrix enables a systematic and comparative assessment of relationships with stakeholders and supports the identification of those requiring priority management, as well as those requiring ongoing monitoring or periodic dialogue. It confirms that the ORLEN Group operates within a complex ecosystem of relationships in which stakeholders with a high degree of mutual impact are of particular importance. Their identification facilitates structured dialogue and integration of their perspectives into the double materiality assessment process in accordance with the requirements of the CSRD Directive.

Key stakeholders include entities whose decisions, needs and views are directly relevant to the Group's growth directions, investments, operational security and financial performance, while the Group's operations have a material impact on their economic, social and environmental circumstances. In 2025, local communities were also classified within this group, reflecting the growing importance of their expectations in the context of the energy transition and the Group's new investments. This change entails the need for in-depth consultations, dialogue and education, as well as initiatives supporting local development and building community trust in investment processes.

Stakeholders that exert a strong impact on the ORLEN Group's operations but are only moderately impacted by the Group are entities that shape the information, regulatory and market environment. Their influence on our reputation and operating conditions is significant; therefore, transparent communication, trend monitoring and active participation in industry and regulatory dialogue are essential.

Stakeholders significantly impacted by ORLEN (in the environmental, social or economic context), whose impact on ORLEN remains moderate, also constitute an important category. In relation to these groups, the Company undertakes consultative, social and environmental efforts, as well as extensive educational initiatives supporting the development of competencies, safety and environmental awareness. ORLEN's educational programmes in the areas of energy and new technologies, as well as environmental protection and safety, significantly contribute to fostering long-term relationships and strengthening the social capital within its business environment.

In 2025, the natural environment was formally identified as a stakeholder for the first time. The ORLEN Group's operations have a direct impact on ecosystem health, natural resources, and air, water and soil quality, while climate change, biodiversity loss and regulatory pressures influence the Group's operating conditions, operating expenses and strategic risks. Incorporating the environment into the Group's stakeholder map, in line with the ESRS approach, which recognises it as a non-human stakeholder, enables ORLEN to better identify areas that require impact mitigation, plan environmental actions, and develop investments supporting the energy transition and low-carbon economy.

The results of stakeholder engagement are used to identify material impacts, risks and opportunities (IROs), define strategic directions for sustainable development, design sustainability policies and actions, and plan communication, consultation and educational activities. The stakeholder dependency matrix will be regularly reviewed and refined in line with the development of the Group's operations and evolution of the social, regulatory and environmental landscape. Further stakeholder engagement, including public consultations, industry partnerships, educational activities and ongoing monitoring of expectations, may result in future adjustments to the matrix, including changes in the materiality of individual stakeholder groups.

The Management Board and the Supervisory Board are regularly informed of stakeholder views through periodic reports on the double materiality assessment (including identified impacts, risks and opportunities), as well as through information provided in project documentation and sustainability reports.

### 6.1.11 Material impacts, risks and opportunities and their interaction with strategy and business model [SBM-3]

The double materiality assessment considers impacts, risks and opportunities related to sustainability matters, as required under ESRS 1 (AR 16), which are impacted by the ORLEN Group (impact materiality) or which have a material impact on the ORLEN Group (financial materiality).

The list of material topics for 2025 covers the same scope of ESRS standards as those identified in 2024, which formed the basis for analysis and assessment. Changes compared to 2024 relate solely to the aggregation of individual impacts, risks and opportunities due to their similar nature and management approach. The impact assessment was also linked to the financial assessment. Furthermore, positive impacts arising from legal requirements or constituting mitigating actions were removed, reducing the number of topics from 78 to 58 so that the report focuses on information that is genuinely material. The materiality threshold remained unchanged in 2025.

In addition to the impacts, risks and opportunities required to be disclosed under ESRS, in 2025 we also considered and presented two entity-specific disclosures.

Table 44 Additional entity-specific topics

| ESRS | Additional entity-specific topics | | |
|---|---|---|---|
| | 2025 | 2024 | |
| E2 Pollution | | Noise pollution | Topic included in ESRS S3 impact on housing conditions |
| S3 Affected communities | Community support, including support for local communities | Community support, including support for local communities | |
| G1 Governance | Cybersecurity | | |

The thematic sections of this Sustainability Statement include tables containing descriptions of material impacts, risks and opportunities identified through the double materiality assessment, and specifying where in the value chain they are concentrated, considering the geographical areas, business segments and types of the ORLEN Group's operations.

The double materiality assessment of impacts identified not only where they occur and their temporal dimension, but also whether they are positive or negative and actual or potential. The identified impacts are interrelated with the ORLEN 2035 strategy, the ORLEN Group Transition Plan and the ORLEN Group Sustainable Development Strategy, which set out objectives and actions in the areas of the energy transition and ESG.

Table 45 Description of material impacts together with their point of origin and time horizon

| Impacts described for | Location in this Sustainability Statement |
|---|---|
| ESRS E1 | Section 1.3 Climate change |
| ESRS E2 | Section 1.4 Pollution |
| ESRS E3 | Section 1.5 Water and marine resources |
| ESRS E4 | Section 1.6 Biodiversity and ecosystems |
| ESRS E5 | Section 1.7 Resource use and circular economy |
| ESRS S1 | Section 1.8 ORLEN Group workforce |
| ESRS S2 | Section 1.9 Workers in the value chain |
| ESRS S3 | Section 1.10 Affected communities |
| ESRS S4 | Section 1.11 Consumers and end-users |
| ESRS G1 | Section 1.12 Business conduct |

Sustainability-related impacts, risks and opportunities are closely linked to our strategy and business model and constitute a key element of our management framework. They are material from the perspective of the long-term resilience of the business model, competitiveness and value creation. Sustainability matters are analysed not only in the context of regulatory requirements, but also as an important enabler for identifying and leveraging long-term growth opportunities for the ORLEN Group, in particular with respect to the development of new business lines, adoption of low- and zero-carbon technologies, and strengthening our competitive position.

As an integrated energy group, we have an impact on the climate and the environment, including through exploration and production, gas distribution, crude processing, petrochemical production, power and heat generation, and energy supply to end users, which involve emissions and the use of natural resources. At the same time, we consistently pursue sustainable development initiatives, investing in the energy transition, development of low- and zero-carbon business lines, and reduction of greenhouse gas emissions. The implementation of the ORLEN 2035 strategy and our commitment to achieving climate neutrality by 2050 are aimed at reducing negative environmental impacts, while strengthening our competitiveness and positive impacts on communities and our economic environment as part of a sustainable transition process.

The identified material impacts, risks and opportunities are directly linked to our ORLEN 2035 strategy, the ORLEN Transition Plan and the ORLEN Group Sustainable Development Strategy. These documents guide our efforts relating to the energy transition, sustainable development, engaging with local communities, and adjustment of our product and service offering to adapt to evolving customer needs, ensuring consistency of our strategic approach over the short-, medium- and long-term horizons. The key time horizon for the ORLEN Group is the period up to 2035, which defines our strategic outlook.

In order to assess the resilience of the ORLEN Group Strategy and the related ORLEN Transition Plan to climate change impacts, the Company regularly analyses the principal factors affecting the Group's growth. As a result, it is able to identify material climate-related risks and opportunities, including transition risks and physical risks, and to evaluate their potential impact on its operations, strategy implementation and ability to create value over the long term. The conclusions of these analyses, covering various scenarios for the legal and regulatory, technological, market and reputational developments, inform the strategic planning process and form the basis for adapting the ORLEN Group's growth directions, including transformation and investment activities, in order to maintain the resilience of the Group's business model under changing external conditions.

Our climate risk analysis is based on a range of climate scenarios and projections for developments in our economic environment, which include both possible unrestricted emissions growth, which is relevant to the materialisation of physical climate risks, and an accelerated energy transition. We have assessed the severity and the likelihood of physical climate risks on the basis of the high-emissions SSP5-8.5 scenario, which assumes an average global air temperature increase of around 4.4°C. Transition risks, in turn, have been analysed based on the low-emission SSP1-1.9 scenario, consistent with the Paris Agreement, which assumes keeping warming below 1.5°C. For the period to 2035, this scenario has been supplemented with the sector-specific scenarios described in disclosure E1, facilitating assessment of the exposure of our assets and operations to transition risks under different rates of economic decarbonisation.

The climate change scenarios we used reflect different possible developments in the ORLEN Group's regulatory, market and technological environment, in particular differing rates of economic decarbonisation resulting, among other things, from the gradual phase-out of fossil fuels and the deployment of low- and zero-carbon technologies.

For detailed information on the resilience analysis of the ORLEN Transition Plan, see disclosure E1.

The current measurement of assets covering all identified risks is presented in the following sections of the consolidated financial statements: Note 4.3 – Impact of sustainability matters on the financial statements, and Note 12.6 – Impairment of property, plant and equipment, intangible assets, goodwill and right-of-use assets.

### 6.1.12 Description of the process to identify and assess material impacts, risks and opportunities [IRO-1]

The primary process we use at the ORLEN Group to identify and assess material impacts, risks and opportunities (IROs) is the double materiality assessment carried out in accordance with the requirements of the CSRD Directive and the Delegated Regulation on European Sustainability Reporting Standards (ESRS).

In 2025, we once again conducted a thorough double materiality assessment, identifying material impacts, risks and opportunities reported on in this Statement. The principle of double materiality means that we have considered:

- the impact materiality perspective, i.e. the ORLEN Group's impacts on the environment and society in relation to sustainability matters,
- the financial materiality perspective, i.e. the impact of sustainability matters on the ORLEN Group's future financial performance.

The analysis covered impacts, risks and opportunities related to all sustainability matters, as required under ESRS 1 (AR 16), as well as topics identified through stakeholder dialogue and benchmarking analysis, including ESG ratings and industry reports for the oil and gas sector.

Stakeholder dialogue within the ORLEN Group was conducted using a variety of tools to engage key stakeholder groups. At the end of 2023 and in early 2024, we conducted a survey covering all sustainability areas among internal and external stakeholders. A total of 138 correctly completed questionnaires were collected, and the results were qualitatively incorporated into the assessment of impact materiality. In 2025, we held dedicated dialogue sessions focusing on social matters. The dialogue process was based on the AA1000 Stakeholder Engagement Standard (AA1000SES), which ensured its reliability and transparency. The sessions were addressed to stakeholders with close links to specific thematic areas, enabling the collection of in-depth expert opinions and expectations and thus facilitating the identification of sustainability topics to be potentially included in the ORLEN Group's sustainability reporting. In identifying material topics, we considered the nature of our operations, business models and the geographical areas in which the ORLEN Group operates. This Sustainability Statement forms part of the ORLEN Group's consolidated reporting and includes material topics identified by subsidiaries which are covered by the reporting obligation. The scales and materiality thresholds applied are derived from ORLEN's management system: Enterprise Risk Management Policy, which is described in disclosure GOV-5.

The double materiality assessment relied on a wide range of internal and external sources of information.

External sources included:

- benchmarking analysis,
- ESG rating analysis,
- analysis of industry reports,
- external tools such as IPBES, GBS@, ENCORE, WWF, Biodiversity Filter,
- stakeholder consultations,
- the LEAP methodology following from a Taskforce on Nature-related Financial Disclosures (TNFD) recommendation.

Internal sources included:

- the risk management process,
- financial statements and Management Board's Report,
- EU Taxonomy-aligned reporting,
- previous sustainability statements,
- customer satisfaction surveys and employee feedback,
- as well as the ORLEN Group Sustainable Development Strategy.

The impact materiality and financial materiality assessments drew on input from numerous experts across various departments and business areas of ORLEN S.A. and other ORLEN Group companies, who are responsible for the management of ESG topics within the Group's segment-based approach. The detailed parameters of impact materiality and financial materiality were also consulted with experts from a third-party consultancy firm. As part of the double materiality assessment, we identified impacts, risks and opportunities based on the above sources and analysed them from both perspectives.

#### Description of the methods and assumptions used in topic areas

#### Climate change

**[E1 IRO-1]**

For climate-related impacts, risks and opportunities, we considered greenhouse gas emissions from the ORLEN Group's operations. These emissions are measured and reported annually in accordance with the GHG Protocol, covering direct emissions (Scope 1), indirect emissions (Scope 2), and value chain emissions (Scope 3), including biogenic emissions. Investment plans and the development of new projects were analysed in terms of their potential future emissions.

We updated our carbon footprint calculation methodology by reassessing emissions materiality and expanding the reporting scope to include additional Scope 3 categories, thereby enabling a more comprehensive reflection of the impact of the Group's operations across the value chain.

The physical climate risk assessment included performing analyses for selected assets using high-emission scenarios, such as SSP5-8.5, which assumes a further growth in GHG emissions and an average global air temperature increase of around 4.4°C.

The findings of the physical risk analysis carried out to date served as the basis for the implementation of appropriate adaptation measures to strengthen the resilience of our infrastructure to extreme weather events. We plan to extend these analyses to additional assets and selected elements of the value chain.

We analysed transition risks and opportunities, including those related to the energy transition. The analysis covered regulatory, technological, market and reputational dimensions, in particular those associated with the revision of the EU ETS, availability of low-carbon technologies, demand dynamics, and perception of the sector. In parallel, we identified opportunities in the area of energy efficiency, development of less carbon intensive energy sources, and diversification of operations. The likelihood of transition risks materialising was assessed on the basis of a low-emission scenario corresponding to the socioeconomic pathway SSP1-1.9, i.e. a scenario aligned with the Paris Agreement, which assumes an accelerated energy transition leading to the limitation of the average global temperature increase to 1.5°C relative to the pre-industrial era.

Given the severity of the transition risks, their assessment for the period to 2035 was also supplemented with the sector-specific scenarios described in disclosure SBM-3, which facilitates assessment of the exposure of the ORLEN Group's assets and operations to transition risks under different and realistic rates of economic decarbonisation. For information on potential emission sources, see disclosure E1.

## Pollution

**[E2 IRO-1]**

In identifying impacts, risks and opportunities related to pollution, we analysed the ORLEN Group's operations across all locations in terms of emissions to air, water and soil, as well as the use of substances of concern. In particular, we considered emissions from production processes and potential risks arising from industrial accidents or failures and other incidents. Our analyses also covered impacts across the value chain, both downstream (including fuel combustion by end users) and upstream (including potential incidents involving crude oil suppliers). Considerations related to the use of substances of very high concern and potential microplastic pollution resulting from the product life cycle were also assessed.

Emissions to air, water and soil were monitored using both measurement-based and calculation-based methods. Direct measurements included continuous monitoring of emitters using CEMS or AMS systems, periodic measurement campaigns run by accredited laboratories, wastewater sampling, and soil quality testing conducted in accordance with applicable regulations on soil pollution. The measurement methods applied were based on PNEN and ISO standards, best available techniques (BAT), and industry methodologies. Calculations were based on recognised sources, such as CONCAWE and PRTR guidelines, as well as mass balance algorithms, process parameters relating to fuel consumption and equipment operating time, and values specified in integrated permits. We did not conduct any consultations with affected communities.

## Water and marine resources

**[E3 IRO-1]**

In identifying impacts, risks and opportunities related to water and marine resources, we analysed the ORLEN Group's operations across particularly water-intensive business segments, including Energy, Downstream, and Consumers & Products (e.g. car washes). Process dependence on the availability of adequate volumes and quality of water resources, as well as associated wastewater discharges, was taken into account. We identify and monitor locations exposed to water risk, including areas of high-water stress or significant water scarcity, using available analytical tools and environmental data, in particular the WRI Aqueduct Water Risk Atlas. The analysis of risks related to water management covers potential non-compliance with wastewater quality parameters and operational risks arising from water scarcity. These risks are mitigated through monitoring systems, preventive technical measures, retention, optimisation of water circuits, closed-loop systems, upgrades in line with Best Available Techniques, and environmental management systems (EMAS, ISO 14001 and ISO 50001, where implemented). At sites with complex infrastructure, ongoing measurements of water withdrawals, recirculation, discharges and wastewater quality enable reliable water balance calculations and early identification of deviations. Consultations with affected communities are conducted as part of building permit procedures.

## Biodiversity and ecosystems

**[E4 IRO-1]**

The analysis of biodiversity-related impacts, risks and opportunities covered transition risks (including political, legal, regulatory, market and technological risks), physical risks (including impacts on ecosystems and ecosystem services), reputational and market risks (associated with transition risks and physical impact), opportunities (associated with transition risks and adaptation), as well as systemic risks.

Identification of biodiversity-related impacts, dependencies, risks and opportunities was carried out based on internal ORLEN Group procedures with certain elements of the TNFD LEAP methodology,

which supports the assessment of impact locations, dependencies on ecosystem services, as well as physical and transition risks across the value chain.

In the case of projects with significant environmental impacts, local communities are invited to participate in the administrative process of a project's environmental impact assessment through public consultations. Beyond these formal requirements, we make an added effort to engage in dialogue with local communities.

This process is consistent with TNFD's guidance on the identification and assessment of nature-related issues, and at the same time ensures alignment with the applicable ESRS disclosure structure.

## Resource use and circular economy

**[E5 IRO-1]**

As part of the double materiality assessment, the identification of material impacts, risks, and opportunities related to resource use and the circular economy took into account key operations in the upstream segments of our value chain, considering key resources and raw materials required for our operations, as well as those remaining after our operations and passed further downstream in the value chain.

Business activities conducted by the ORLEN Group consist in the production of natural gas and crude oil, production of fuels, chemicals and petrochemicals, and generation of power and heat. Our operations involve the use of substantial quantities of raw materials, such as crude oil, natural gas, coal, as well as biomass and biocomponents.

Within the ORLEN Group, biocomponents and biofuels are governed by principles embedded in the Integrated Management System, which are consistent with the requirements of Directive 2018/2001 (RED II) and of the ISCC and KZR INiG schemes concerning sustainability criteria for biofuels. The scope of biofuel and biocomponent production meeting the above criteria is defined in a dedicated procedure. The procedure encompasses multiple operational aspects, including procurement of raw materials for the manufacture of biofuels and biocomponents, technological production process, sale of finished products, calculations of greenhouse gas emissions, mass balance tracking, and data reporting. Compliance with these requirements is validated through certification.

The amount of waste generated by the ORLEN Group is documented in accordance with the laws in force in each country, using locally implemented systems. The applicable system in Poland is the Database on Products and Packaging and on Waste Management (BDO), which maintains an ongoing quantitative and qualitative record of generated waste (based on supporting documentation such as waste transfer notes (KPO) and waste record sheets (KEO)) and waste management methods.

The classification of waste generated by the ORLEN Group is aligned with the methods specified in integrated or sectoral permits.

Waste management methods applied across the ORLEN Group are governed by applicable legal regulations, permits, adopted standards and policies (including the ORLEN Group Environmental Protection Policy, the ORLEN Group Circular Economy Policy, and Organisational Standard No. SO/4/2023 of 20 December 2023 on hazardous waste management), as well as procedures and regulations specific to individual ORLEN Group companies.

In addition, waste management and the circular economy were addressed during dialogue sessions with external stakeholders. Discussions on this topic involved representatives of industry organisations and companies specialising in waste management and the circular economy, resulting in a stakeholder assessment of the ORLEN Group's impacts and activities in this area. No consultations with affected communities were held.

## Business conduct

**[G1 IRO-1]**

When identifying material impacts, risks, and opportunities in the area of business conduct, we relied on a variety of available sources, including feedback from external stakeholders, such as government institutions, EU bodies, and other third parties. An internal expert assessment was also used. The criteria applied in this process took into account the nature of the Group's operations, including specific locations and sectors. A general picture of the Group's relations with suppliers was also considered, including the structure of transactions.

## Impact materiality perspective

### The assessment considered impacts occurring:

Upstream the value chain | Within our operations | Downstream the value chain

In line with ESRS requirements, the assessment of impact materiality was conducted **separately for each segment** in which the ORLEN Group generated more than 10% of its revenue in the previous financial year.

**Criteria used to assess impacts included:**

- temporal dimension of the impact (actual or potential impacts)
- scale of the impact
- scope of the impact
- irremediable character of the impact
- likelihood of the impact

**STEPS IN THE IMPACT MATERIALITY ASSESSMENT PROCESS**

**Step 1** involved identifying where the impact occurs

**The assessment considered impacts occurring:**


UPSTREAM & SUPPLY

DOWNSTREAM

ENERGY

CONSUMER & PRODUCTS

**Step 2** involved identifying the temporal dimension of the impact:

**actual impacts** (currently occurring) | **potential impacts** (may occur in the future)

**Step 3** involved assessing the impact based on the following criteria and dimensions:

**Assessment criteria:**

Positive impacts:
- scale of the impact
- scope of the impact
- likelihood of the impact

Negative impacts:
- scope of the impact
- irremediable character of the impact
- scale of the impact
- likelihood of the impact

**Assessment criteria:**

Positive impacts:
- scale of the impact
- scope of the impact
- likelihood of the impact

Negative impacts:
- scope of the impact
- irremediable character of the impact
- scale of the impact
- likelihood of the impact

In addition, potential impacts were analysed across the following time horizons:

short-term – 1 year | medium-term – 1 to 5 years | long-term – beyond 5 years

### ASSESSMENT DIMENSIONS ALIGNED WITH THE ASSESSMENT CRITERIA

**Scale of the impact**

- 5: critical / transformative – the organisation's impact alters the conditions in its environment
- 4: significant / clearly noticeable to the environment – the organisation's impact is clearly visible and substantially influences the conditions in its environment
- 3: moderate / moderately noticeable to the environment – the organisation's impact is perceptible and results in minor improvement or deterioration of conditions in its environment
- 2: small / barely noticeable to the environment – the organisation's impact is perceptible but does not significantly improve or deteriorate conditions in its environment
- 1: negligible / not noticeable by the environment – the organisation's impact is not visible or noticeable by the environment
- 0: not applicable

**Grading scale for impact likelihood**

- 5: almost certain – the impact is expected to occur
- 4: likely – the occurrence of the impact is highly probable
- 3: possible – the impact may occur under certain conditions
- 2: rather unlikely – there is a low probability that the impact will occur
- 1: unlikely – the impact may occur only under exceptional conditions
- 0: impossible

**Grading scale for impact scope**

- 5: global – the organisation's impact is noticeable worldwide
- 4: widespread (affecting more than one country) – the organisation's impact is noticeable across a number of countries related to the organisation's operations
- 3: national – the organisation's impact is noticeable in the country where it operates
- 2: regional – the organisation's impact is noticeable within one or more provinces (e.g. voivodeships) of Poland
- 1: local (in the immediate vicinity of the organisation) – the organisation's impact is limited to its direct surroundings and does not extend beyond the county (pol. powiat) in which the organisation operates
- 0: not applicable

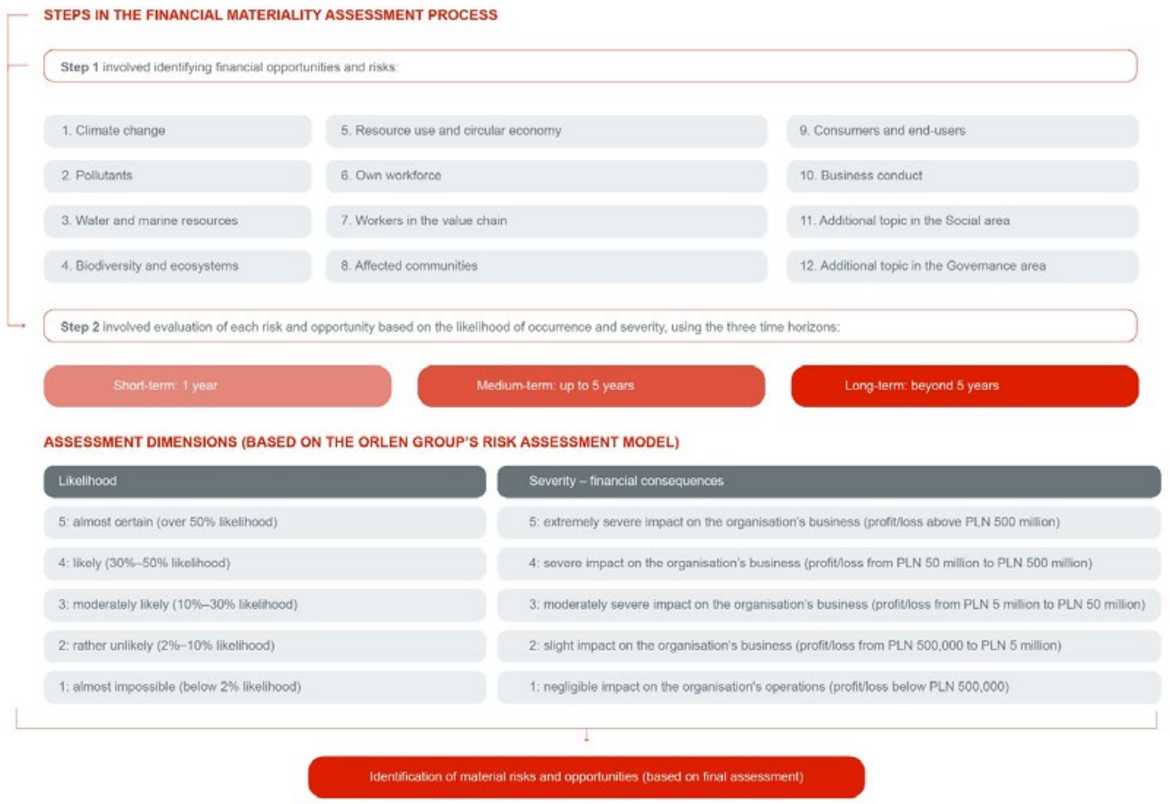
**Grading scale for impact irremediability**

- 5: irremediable – the impact cannot be reversed; the consequences cannot be remediated
- 4: extremely difficult to remediate or long-lasting – remediating the impact i s extremely difficult and may only be possible over an extended period; it requires specific interventions involving substantial financial resources and a significant amount of time
- 3: difficult to remediate or medium-term – the consequences of the impact are difficult but possible to remediate; remediation will take considerable time and require specific interventions involving moderately high financial resources and time commitment
- 2: possible to remediate but costly (in time and/or resources) – the impact can be remediated, but will require specific actions involving expenditures and time commitment
- 1: easily or relatively easily remediable in the short-term – the impact can be remediated with minimal effort, potentially even without active intervention, and will not require substantial financial resources and time commitment (though it may require some time)
- 0: not applicable

A weighted average was used to assess impacts, with more weight assigned to impact severity (understood as the scale, scope and irremediable character of the impact) than to its likelihood. Resulting scores ranged from 0 to 5, with the materiality threshold set at 3. Impacts scoring above 3 were considered material. For actual impacts, likelihood was always assigned the maximum score of 5, reflecting that the event has already occurred or its effects are ongoing. The impact score is calculated as a weighted average of the scores assigned to individual criteria. This approach ensures that actual impacts, being documented and characterised by the highest likelihood, can have higher materiality ratings than potential impacts, preventing the underestimation of impacts that have actually occurred and resulted in documented consequences.

## Financial materiality perspective

Risks and opportunities were assessed according to the likelihood of occurrence and financial impact of the event. The materiality and financial thresholds applied are consistent with the ORLEN S.A. Enterprise Risk Management Policy.



## RISK MAPPING METHODOLOGY

The matrix and thresholds used in the assessment of financial materiality are derived from ORLEN's management system: Enterprise Risk Management Policy




In assessing financial materiality, risk is defined as a combination of severity and likelihood, both measured on a scale from 1 to 5, resulting in 25 possible risk combinations for the ORLEN Group, ranked by materiality from 1 to 25. From the perspective of the double materiality assessment, topics are considered material if their associated risks are assessed as moderate (10–15>, high (15–20> or critical (20–25>, i.e. the materiality threshold is set at 10.

### Validation of results

The final list of material topics was discussed during a meeting of the Climate and Sustainability Council and Sustainability Committee. In February 2026, it was formally approved by the Management Board and the Supervisory Board. For a description of changes in the double materiality assessment, see disclosure SBM-3.

## Material topics identified in the double materiality assessment process

As a result of the double materiality assessment, we analysed 76 material topics in accordance with the ESRS, including 22 environmental topics, 48 social topics, and 6 topics related to governance, as well as 2 additional entity-specific topics (not covered under the ESRS) that are considered significant in the context of the ORLEN Group's operations.

Table 46 List of material sustainability matters (by sub-topics and sub-sub-topics)

| Topic | List of material sustainability matters (by sub-topics and sub-sub-topics) |
|---|---|
| Climate change | Climate change adaptation<br>Climate change mitigation<br>Energy |
| Pollutants | Pollution of air<br>Pollution of water<br>Pollution of soil<br>Substances of concern<br>Substances of very high concern<br>Microplastics |
| Water and marine resources | Water consumption<br>Water withdrawals<br>Water discharges |
| Biodiversity and ecosystems | Climate change as a direct driver of biodiversity loss<br>Land-use change, freshwater-use change and sea-use change as direct drivers of biodiversity loss<br>Direct exploitation as a direct driver of biodiversity loss<br>Pollution as a direct driver of biodiversity loss<br>Species population size<br>Impacts on the extent and condition of ecosystems<br>Impacts and dependencies on ecosystem services |
| Resource use and circular economy | Resource inflows, including resource use<br>Resource outflows related to products and services<br>Waste |
| Own workforce | Secure employment<br>Working time<br>Adequate wages<br>Social dialogue with employees<br>Freedom of association, the existence of works councils and the information, consultation and participation rights of workers<br>Collective bargaining, including percentage of employees covered by collective bargaining agreements<br>Work-life balance of the workforce<br>Health and safety<br>Gender equality and equal pay for work of equal value<br>Training and skills development<br>Diversity at the workplace<br>Measures against violence and harassment in the workplace<br>Privacy of employees |
| Workers in the value chain | Secure employment of value chain workers<br>Working time of value chain workers<br>Adequate wages for value chain workers<br>Social dialogue with value chain workers<br>Health and safety of value chain workers |
| Affected communities | Adequate housing for local communities<br>Land-related impacts, impacts on indigenous peoples<br>Security-related impacts<br>Freedom of expression |

| Topic | List of material sustainability matters (by sub-topics and sub-sub-topics) |
|---|---|
| Consumers and end-users | Privacy of consumers and end-users<br>Freedom of expression for consumers and end-users<br>Access to (quality) information<br>Security of a person<br>Protection of children<br>Access to products and services<br>Health and safety of consumers and end-users<br>Responsible marketing practices |
| Business conduct | Corporate culture<br>Whistleblower protection<br>Political engagement and lobbying activities<br>Management of relationships with suppliers including payment practices |
| Additional topic in the Social area | Community support, including support for local communities |
| Additional entity-specific topic in the Business Conduct area | Cybersecurity and data processing |

The identified impacts, risks and opportunities are presented in the disclosures on the respective areas.

The information disclosed under IRO-2 is available in appendices at the end of this Sustainability Statement.

## 6.2 EU Taxonomy

### 6.2.1 Regulatory framework

**Regulation (EU) 2020/852 of the European Parliament and of the Council** of 18 June 2020 on the establishment of a framework to facilitate sustainable investment requires that we disclose in the non-financial statement of the ORLEN Group for 2025 information on how and to what extent our activities fall within the scope of the EU Taxonomy for environmentally sustainable economic activities.

The criteria for determining which economic activities qualify as environmentally sustainable (i.e. are aligned with the EU Taxonomy) have been established under:

- **Commission Delegated Regulation (EU) 2021/2139** of 4 June 2021 establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives;
- **Commission Delegated Regulation (EU) 2022/1214** of 9 March 2022 as regards economic activities in certain energy sectors, establishing the technical screening criteria for nuclear and fossil gas related activities;
- **Commission Delegated Regulation (EU) 2023/2485** of 27 June 2023 establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives;
- **Commission Delegated Regulation (EU) 2023/2486** of 27 June 2023 establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to the sustainable use and protection of water and marine resources, to the transition to a circular economy, to pollution prevention and control, or to the protection and restoration of biodiversity and ecosystems, and for determining whether that economic activity causes no significant harm to any of the other environmental objectives;
- **Commission Delegated Regulation (EU) 2026/73** of 4 July 2025 amending Delegated Regulation (EU) 2021/2178 as regards the simplification of the content and presentation of information to be disclosed concerning environmentally sustainable activities and Delegated Regulations (EU) 2021/2139 and (EU) 2023/2486 as regards simplification of certain technical screening criteria for determining whether economic activities cause no significant harm to environmental objectives[1].

The disclosure obligations have been further clarified in **Commission Delegated Regulation (EU) 2021/2178** of 6 July 2021 specifying the content and presentation of information to be disclosed by undertakings subject to Articles 19a or 29a of Directive 2013/34/EU concerning environmentally sustainable economic activities, and specifying the methodology to comply with that disclosure obligation. These obligations have been modified by the abovementioned Commission Delegated Regulation (EU) 2026/73[2].

### 6.2.2 Consolidated disclosures of the ORLEN Group

As part of our 2025 disclosures, we are required to provide descriptive information and disclose the proportion of the ORLEN Group's economic activities classified as Taxonomy-eligible and Taxonomy-aligned along six environmental objectives, i.e. climate change mitigation, climate change adaptation, sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control, and protection and restoration of biodiversity and ecosystems (jointly:

[1] Regulation (EU) 2021/2139, Regulation (EU) 2023/2485, Regulation (EU) 2022/1214, Regulation (EU) 2023/2486 and Regulation (EU) 2026/73 are jointly referred to as the "Technical Screening Criteria" or "TSC".

[2] Regulation (EU) 2020/852, Regulation (EU) 2021/2139, Regulation (EU) 2021/2178, Regulation (EU) 2022/1214, Regulation (EU) 2023/2485, Regulation (EU) 2023/2486 and Regulation (EU) 2026/73 are jointly referred to as the "EU Taxonomy" or "Taxonomy".

"environmental objectives"). Moreover, with respect to those environmental objectives, we disclose the proportion of the ORLEN Group's Turnover from the sale of products or services, capital expenditures (CAPEX) and operating expenditures (OPEX) related to environmentally sustainable economic activities[3].

The number of Taxonomy-eligible and Taxonomy-aligned activities may vary from year to year, which is due to the size of the ORLEN Group. As part of our operations, we acquire or establish new companies and launch new projects that, once specific criteria have been met, may be recognised as environmentally sustainable.

## Determination of Taxonomy-eligible economic activities

In accordance with the EU Taxonomy, an economic activity qualifies as Taxonomy-eligible irrespective of whether that economic activity meets any or all of the Technical Screening Criteria. We have determined which of the ORLEN Group's activities qualify as Taxonomy-eligible and Taxonomy-non-eligible based on the description of activities contained in the EU Taxonomy, and using the NACE codes provided there as ancillary information. Our economic activities that qualify as Taxonomy-eligible are associated primarily with the climate-related objective of climate change mitigation. The activities listed at the end of this section are associated with operations that generate revenue or involve capital expenditures or operating expenditures. Activities which do not involve such revenue and expenditures are not subject to the disclosure obligations.

Early-stage research and development projects are not Taxonomy-eligible activities. We have not recognised as Taxonomy-eligible our activities related directly to refining processes and based on fossil fuels, as the Taxonomy does not cover activities related to the manufacture and sale of fuels.

It should be noted that the EU Taxonomy requires interpretation, so in our assessment of Taxonomy-eligibility we took into account the FAQs documents published by the European Commission. If the European Commission issues any new interpretations, this may affect both the future eligibility of specific activities and their assessment as Taxonomy-aligned.

Following a detailed review of all of the ORLEN Group's economic activities, it was determined that **thirty-five** of them qualify as contributing to the first environmental objective, i.e. climate change mitigation, whereas **one** qualifies as contributing to climate change adaptation. **One** activity qualifies as contributing to the objective related to the sustainable use and protection of water and marine resources, **three** activities qualify as contributing to the transition to a circular economy, and **three** – to pollution prevention and control.

Table 47 List of eligible activities

| **Climate change mitigation** | | |
|---|---|---|
| Manufacture of other low-carbon technologies (chemical recycling, cold-mix asphalt) (3.6) | Transmission and distribution of electricity (4.9) | Production of heat/cool from fossil gaseous fuels in an efficient district heating and cooling system (4.31) |
| Manufacture of hydrogen (green and grey hydrogen) (3.10) | Storage of electricity (energy storage facilities and pumped storage power plant) (4.10) | Construction, extension and operation of water collection, treatment and supply systems (5.1) |
| Manufacture of carbon black (3.11) | Storage of thermal energy (4.11) | Renewal of water collection, treatment and supply systems (5.2) |
| Manufacture of chlorine (3.13) | Manufacture of biogas and biofuels for use in transport and of bioliquids (4.13) | Construction, extension and operation of waste water collection and treatment (5.3) |
| Manufacture of organic basic chemicals (vinyl chloride, propylene, butadiene, paraxylene and more) (3.14) | Transmission and distribution networks for renewable and low-carbon gases (4.14) | Renewal of waste water collection and treatment systems (5.4) |
| Manufacture of ammonia (3.15) | District heating/cooling distribution (4.15) | Collection and transport of non-hazardous waste in source segregated fractions (5.5) |
| Manufacture of nitric acid (3.16) | Installation and operation of electric heat pumps (4.16) | Freight rail transport (rental and use of own rail wagons) (6.2) |
| Manufacture of plastics in primary forms (low-density polyethylene, polyvinyl chloride, resins) (3.17) | Cogeneration of heat/cool and power from bioenergy (generation of heat and power at cogeneration projects) (4.20) | Freight transport services by road (6.6) |
| Electricity generation using solar photovoltaic technology (4.1) | Production of heat/cool from bioenergy (production of thermal energy) (4.24) | Infrastructure for rail transport (6.14) |
| Electricity generation from wind power (4.3) | Production of heat/cool using waste heat (4.25) | Infrastructure enabling low-carbon road transport and public transport (electric vehicle charging stations and hydrogen refuelling stations) (6.15) |
| Electricity generation from hydropower (4.5) | Electricity generation from fossil gaseous fuels (4.29) | Installation, maintenance and repair of renewable energy technologies (solar panels) (7.6) |
| Electricity generation from bioenergy (4.8) | High-efficiency co-generation of heat/cool and power from fossil gaseous fuels (generation of heat and power at high-efficiency cogeneration projects) (4.30) | |

| **Climate change adaptation:** |
|---|
| Transmission and distribution of electricity (4.9) |

[3] The key performance indicators are referred to as "key indicators" "indicators" or "KPIs".

| | | |
|---|---|---|
| **Sustainable use and protection of water and marine resources:** | | |
| Water supply (2.1) | | |
| **Transition to a circular economy:** | | |
| Production of alternative water resources for purposes other than human consumption (2.2) | Treatment of hazardous waste (2.4) | Sorting and material recovery of non-hazardous waste (2.7) |
| **Pollution prevention and control:** | | |
| Collection and transport of hazardous waste (2.1) | Treatment of hazardous waste (2.2) | Remediation of contaminated sites and areas (2.4) |

### 6.2.3 Determination of Taxonomy alignment of Taxonomy-eligible economic activities (environmental objectives)

The process of determining Taxonomy alignment of economic activities in accordance with the requirements for reporting year 2025 was performed for all six environmental objectives, and consisted in analysing compliance with the criteria of making a 'substantial contribution' to one primary objective and the criteria of 'doing no significant harm' ("DNSH") to the other environmental objectives.

Out of the list of the abovementioned eligible activities, **sixteen** were identified as being aligned with the Taxonomy (these activities are described below). We reviewed the material contribution criteria for individual activities eligible under all six environmental objectives. Where the substantial contribution criteria were not met or compliance with the criteria could not be confirmed, the activities were not reported as Taxonomy-aligned. The scope of work undertaken to verify the above criteria was the same for both Taxonomy-aligned and non-aligned activities.

Alignment with the TSC was identified only for activities related to the objectives of climate change mitigation and climate change adaptation. For the remaining objectives, no activities aligned with the EU Taxonomy were identified.

#### 6.2.3.1 Substantial contribution

The EU Taxonomy has established various substantial contribution criteria for eligible activities. In our analysis, we have assessed compliance with the criteria established for each activity. Below is an explanation of how this assessment was performed.

Climate change mitigation:

- With respect to activities 4.1. *Electricity generation using solar photovoltaic technology, 4.3 Electricity generation from wind power, 4.10 Storage of electricity, 4.11 Storage of thermal energy, and 7.6 Installation, maintenance and repair of renewable energy technologies,* the conduct of these activities is sufficient as no specific substantial contribution criteria apply. The abovementioned activities of the ORLEN Group make a substantial contribution to climate change mitigation.
- For *3.10. Manufacture of hydrogen,* we verified compliance with all the required criteria pertaining to substantial contribution. The analysis confirmed that in 2025 three activities complied with the Technical Screening Criteria, as evidenced by the documented calculations of life-cycle GHG emissions limits.
- As disclosed in Current Report No. 64/2024, we re-examined the Technical Screening Criteria for activity *3.14 Manufacture of organic basic chemicals*. They could not be confirmed for 2025, and therefore we decided not to report this activity as Taxonomy-aligned. Since the classification of activity 3.14 as non-aligned in the current reporting period does not result from an error in the previous period, but from a change in the project's business scope, we have not restated the comparative KPI values.
- We believe that in the case of activity *4.9. Transmission and distribution of electricity,* provisions of the Taxonomy regarding compliance with the substantial contribution criteria are not clearly formulated and require interpretation.
- Since 2023, we have applied the approach used by most energy sector entities and recognised Turnover derived from energy distribution, as well as capital and operating expenditure on this activity, as Taxonomy-aligned. Not all of the ORLEN Group's activities meet all TSC criteria; therefore, some of the KPIs related to those activities are Taxonomy-eligible but not Taxonomy-aligned.

It should be noted that our approach may change in the future if the European Commission revises its existing regulations or issues its position on that matter.

- With respect to activity *4.13. Manufacture of biogas and biofuels for use in transport and of bioliquids*, Regulation 2021/2139 establishes a number of substantial contribution criteria, including GHG emissions limits. To assess Taxonomy alignment, we performed an analysis of compliance with the Technical Screening Criteria, which led to the conclusion that some of the ORLEN Group's investment projects associated with the production of advanced biofuels satisfy the substantial contribution criteria.
- With respect to activity 4.14 *Transmission and distribution networks for renewable and low-carbon gases*, Regulation (EU) 2021/2139 sets out three alternative criteria (construction, conversion or

repurposing, or retrofit of gas networks for the transmission and distribution of renewable and low-carbon gases), and compliance with only one of them is sufficient. It also establishes an additional criterion concerning leak detection and repair of existing gas pipelines to reduce methane leakage. The activity complies with the required criteria.

- With respect to activity *4.15. District heating/cooling distribution*, Regulation 2021/2139 provides for a number of alternative criteria but compliance with only one of them is sufficient. Following an analysis, it was concluded that some of our heat distribution activities meet the definition of an efficient district heating system and, consequently, satisfy the substantial contribution criteria.
- With respect to activity 4.16 *Installation and operation of electric heat pumps*, we identified an activity meeting the refrigerant threshold criterion and confirmed compliance with the energy efficiency requirements.
- In 2025, an installation falling within the scope of activity 4.20. *Cogeneration of heat/cool and power from bioenergy* was classified as Taxonomy-aligned. Verification of its compliance with the substantial contribution criteria, with particular emphasis on the GHG emissions limits and biomass criteria, yielded a positive result.
- With respect to activity 4.24 *Production of heat/cool from bioenergy*, Regulation (EU) 2021/2139 establishes a number of criteria, including criteria relating to the parameters of the biomass used for energy generation and greenhouse gas emission savings. The verification confirmed that our projects complied with the substantial contribution criteria.
- With respect to activity 6.15. *Infrastructure enabling low-carbon road transport and public transport*, we verified compliance with the substantial contribution criteria, in particular the criterion relating to infrastructure required for the operation of vehicles having zero direct (tailpipe) $CO_2$ emissions. As a result, assets falling within the scope of this activity, i.e. EV charging infrastructure and hydrogen refuelling stations, were classified as Taxonomy-aligned.

Climate change adaptation:

- With respect to activity 4.9 *Transmission and distribution of electricity*, we identified one activity at the ORLEN Group that advances both climate-related objectives. Appropriate adaptation plans have been prepared for the identified physical climate risks. The activity complies with the substantial contribution criteria for the objective of climate change adaptation.

### 6.2.3.2 Compliance with the DNSH criteria

The DNSH criteria are designed to ensure that economic activities do no significant harm to the other environmental objectives. The combination of the substantial contribution and DNSH criteria is aimed at ensuring that contribution to one of the environmental objectives of the Taxonomy is not made at the expense of other environmental objectives. The DNSH criteria vary from activity to activity (except for those DNSH criteria that apply to climate change adaptation, where the assessment approach is substantially the same for all activities). We have analysed compliance with the DNSH criteria for all economic activities meeting the substantial contribution criteria. The analysis included an assessment of the location where a given economic activity is carried out, the specific nature of the economic activity concerned and the applicable DNSH criteria. For some activities that meet the substantial contribution criteria, it was not possible to fully confirm compliance with the DNSH criteria, for instance due to the limited potential of the installation infrastructure or lack of complete documentation demonstrating satisfaction of the Technical Screening Criteria. Where this was the case, we did not report the activity as Taxonomy-aligned.

### 6.2.3.3 Compliance with minimum safeguards

The assessment of the ORLEN Group's compliance with the minimum safeguards as defined in the EU Taxonomy was carried out with due consideration of the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (the "OECD Guidelines"), the UN Guiding Principles on Business and Human Rights (the "UN Guiding Principles"), the Platform on Sustainable Finance report on minimum safeguards, as well as other guidance and instructions, such as the Guidebook for Enterprises on the Application of the Minimum Safeguards of the EU Taxonomy prepared by the Working Group on Minimum Safeguards operating at the Polish Ministry of Development Funds and Regional Policy.

Minimum safeguards serve as a protective mechanism. They consist of appropriate procedures, in particular those relating to due diligence, designed to ensure that the company's activities are aligned with the OECD Guidelines and the UN Guiding Principles while minimising negative impacts. However, due diligence procedures cannot guarantee that breaches of human rights, labour rights or standards relating to other thematic areas covered by the OECD Guidelines will never occur. Instead, their purpose is to verify whether we are actively making every effort to prevent actual adverse impacts.

Our assessment covered six areas:

- human rights, labour rights and consumer rights,
- the environment,
- combating bribery and other forms of corruption,
- science, technology and innovation,
- fair competition,
- taxation.

Standards of responsible business conduct are embedded in the ORLEN Group's organisational culture and reflected in a wide range of internal policies, procedures and processes. We have

incorporated elements of the due diligence process set out in the OECD Guidelines and the UN Guiding Principles into our operations through a number of adopted and implemented documents. Our key policies addressing this area include: the ORLEN Group Code of Ethics, ORLEN Group Supplier Code of Conduct, ORLEN Group Human Rights Policy (Human Rights Policy), policies governing employee matters (including non-discrimination and equal opportunities), Competition Law Compliance Policy, ORLEN Group Anti-Corruption and Fraud Prevention Policy, and whistleblowing policies.

We apply preventive and mitigating measures to reduce the risk of adverse impacts and ensure an appropriate response to identified irregularities, including, in particular, onboarding training and dedicated employee training in areas such as anti-corruption, human rights, fair competition, data security, environmental protection, and occupational health and safety. These measures also extend to the value chain: suppliers participating in our procurement procedures are required to familiarise themselves with and accept our key standards, including the ORLEN Group Supplier Code of Conduct, the Code of Ethics, the Human Rights Policy, the Anti-Corruption Policy, the Policy for Accepting and Offering Gifts, and the Conflict of Interest Management Policy. In addition, we incorporate appropriate clauses in our contracts and agreements with trading partners, covering environmental protection, occupational health and safety, sanctions, anti-corruption, and beneficial ownership statements. Where irregularities are identified or supplier assessments produce unsatisfactory results, we take remedial actions and their implementation is subject to further monitoring.

In line with the ORLEN Group's existing policies, procedures and practices, the measures taken and their outcomes are monitored on an ongoing basis, using internal reporting mechanisms, periodic assessments and reviews of the solutions in place. This monitoring is the responsibility of the organisational units competent for the matter concerned. Particular attention is paid to the results of periodic and ad hoc supplier assessments, the effectiveness of remedial actions, and the functioning of whistleblowing mechanisms. This approach strengthens our due diligence framework as it helps identify areas requiring improvement and progressively enhance the consistency, transparency and effectiveness of the process components.

Examples of the ongoing development of our due diligence procedures include the work continued in the reporting period on supplier evaluation methodology and further efforts to integrate processes and policies across the ORLEN Group. In 2025, workshops devoted to due diligence were held across the Group to build the companies' capabilities in this area and ensure greater consistency in the measures taken. During those meetings, existing practices were reviewed and directions for change were identified in key processes to improve their effectiveness, transparency and alignment with applicable regulations and market standards.

As part of the Know Your Customer (KYC) process, which is being currently developed, we reviewed the Supplier Code of Conduct for compliance with requirements in the social area. A number of areas that need further improvement were also identified. In parallel, work is under way to implement a formal due diligence process across the Group, which will make it possible to integrate and harmonise the procedures and policies currently in place, ensuring consistent standards of conduct throughout the organisation.

In its recommendation on the assessment of compliance with minimum safeguards, the Platform on Sustainable Finance operating under the European Commision, refers to violations identified for individual topics.refers to violations identified for individual topics. We did not identify any final court judgments issued in 2025 that were relevant for this assessment. For more information on the respective topics associated with minimum safeguards, see the dedicated sections of this Sustainability Statement.

### 6.2.4 Key performance indicators and relevant accounting principles

The key performance indicators (KPIs) have been calculated in accordance with the guidelines set out in Regulation 2021/2178. We calculated the proportion of Turnover, capital expenditure (CAPEX) or operating expenditure (OPEX) that is associated with environmentally sustainable activities based on the same accounting principles as those used to prepare the ORLEN Group's consolidated full-year financial statements. The calculation of the KPIs for the Group took into account the relevant consolidation eliminations applied in the preparation of the financial statements. The KPIs presented in this Sustainability Statement do not include intra-group sales and Turnover resulting from captive consumption. No financial item was double counted: where appropriate, data was disaggregated as necessary to eliminate the risk of double counting. In cases where a single Taxonomy-eligible installation was used in both eligible and non-eligible activities, only the separated part of Turnover, capital expenditure and operating expenditure that was associated with the Taxonomy-aligned activity was used in calculating the KPIs. In the few cases where this did not have a significant effect on a KPI, a simplified approach was applied. With respect to the ORLEN Group's operations outside of Poland, all activities were assessed in the same way as the activities carried out in Poland.

Turnover KPI

The Turnover KPI was determined by dividing net revenue from sale of products or provision of services associated with our Taxonomy-eligible and Taxonomy-aligned economic activities by the ORLEN Group's consolidated revenue.

The process of verifying compliance with the Technical Screening Criteria and calculating the key performance indicators was overseen by the ORLEN Group's parent. The basis for calculating the Turnover KPI was the ORLEN Group's consolidated revenue for 2025, as disclosed in the consolidated financial statements in Note 11.1 – Revenue. The Turnover KPI was calculated using financial data on sales of products and services to customers outside the Group. 99.5% of the ORLEN Group's revenue is generated from contracts with customers.

The changes in the turnover KPI were driven by higher volumes and increased margins on electricity distribution in Taxonomy-eligible and Taxonomy-aligned activities, as discussed in more detail in Section 4.3 of the Management Board's Report. The largest increase in revenue was recorded for activity CCM 4.9 *Transmission and distribution of electricity*.

## CAPEX KPI

We calculated the CAPEX KPI by dividing the sum of capital expenditure associated with Taxonomy-eligible and Taxonomy-aligned economic activities by the ORLEN Group's total capital expenditure.

The capital expenditure used in calculating the KPI was the ORLEN Group's capital expenditure including additions to property, plant and equipment presented in Note 10 – Revenue, expenses, financial results, additions to non-current assets, segment assets.

The difference between the amount of capital expenditure disclosed in the consolidated financial statements and the denominator of the CAPEX KPI results from including in the denominator energy rights acquired (for details, see Note 12.3.1 – Property rights), and additions to property, plant and equipment, intangible assets and other non-current assets on the acquisition of new companies (excluding goodwill) as at the date of acquiring control (for details, see Note 7.3 – Business combinations). The CAPEX KPI denominator does not include property rights received free of charge or goodwill, which is not defined as an intangible asset under IAS 38.

Where the same items of property, plant and equipment or intangible assets were also used to produce products or services associated with Taxonomy-non-eligible economic activities, the capital expenditure was disaggregated. In calculating the amount of capital expenditure (the numerator of the KPI for the relevant activity), we took into account the utilisation rate of the assets.

In preparing our CAPEX KPI disclosures for 2025, we exercised the option not to assess activities deemed immaterial – CCM 6.5 *Transport by motorbikes, passenger cars and light commercial vehicles*, CCM 7.2 *Renovation of existing buildings*, and CCM 7.7 *Acquisition and ownership of buildings*. We consider these activities immaterial, as they do not meet the criterion of financial materiality and are administrative in nature.

The CAPEX KPI reflects capital expenditure incurred under a CAPEX plan to expand Taxonomy-aligned economic activities or upgrade Taxonomy-eligible economic activities to render them Taxonomy-aligned (the "CAPEX Plan"). Details of capital expenditure included in the CAPEX KPI numerator, including capital expenditure incurred as part of the CAPEX Plan, are shown in the table below.

## Table 48 Quantitative breakdown at economic activity aggregated level of amounts included in the CAPEX numerator into categories identified at the ORLEN Group as defined by Regulation 2021/2178 [PLN million]

| Taxonomy-aligned economic activity (No) | Increase in property, plant and equipment* | Increase in intangible assets (purchased and developed internally) | Other increases | Total CAPEX for Taxonomy-aligned economic activities | Including increase from business combinations | Including under the CAPEX Plan | Total capital expenditure under the CAPEX Plan** | Expected capital expenditure under the CAPEX Plan | Years covered by the CAPEX Plan*** |
|---|---|---|---|---|---|---|---|---|---|
| CCM 3.10 | 11.38 | 0.00 | 0.00 | 11.38 | 0.00 | 10.58 | 67.29 | 3.48 | 2021-2026 |
| CCM 4.1 | 47.57 | 0.00 | 0.00 | 47.57 | 0.00 | 29.14 | 71.64 | 13.87 | 2024-2026 |
| CCM 4.3 | 2.53 | 0.28 | 0.00 | 2.81 | 0.00 | 0.00 | 0.00 | 0.00 | N/A |
| CCM 4.9 | 2,657.68 | 112.79 | 0.00 | 2,770.47 | 0.00 | 0.00 | 0.00 | 0.00 | N/A |
| CCA 4.9 | 413.53 | 0.00 | 0.00 | 413.53 | 0.00 | 0.00 | 0.00 | 0.00 | N/A |
| CCM 4.10 | 1.45 | 0.00 | 0.00 | 1.45 | 0.00 | 0.00 | 0.00 | 0.00 | N/A |
| CCM 4.11 | 37.62 | 0.00 | 0.00 | 37.62 | 0.00 | 37.62 | 160.36 | 120.70 | 2024-2027 |
| CCM 4.13 | 182.58 | 0.00 | 0.00 | 182.58 | 0.00 | 182.58 | 1,524.93 | 665.68 | 2021-2027 |
| CCM 4.14 | 1.60 | 0.00 | 0.00 | 1.60 | 0.00 | 0.00 | 0.00 | 0.00 | N/A |
| CCM 4.15 | 2.02 | 0.00 | 0.00 | 2.02 | 0.00 | 0.00 | 0.00 | 0.00 | N/A |
| CCM 4.16 | 2.34 | 0.00 | 0.00 | 2.34 | 0.00 | 0.00 | 0.00 | 0.00 | N/A |
| CCM 4.20 | 6.91 | 0.00 | 0.00 | 6.91 | 0.00 | 0.00 | 0.00 | 0.00 | N/A |
| CCM 4.24 | 71.37 | 0.00 | 0.00 | 71.37 | 0.00 | 62.85 | 137.86 | 13.74 | 2023-2025 |
| CCM 6.15 | 178.33 | 0.00 | 1.04 | 179.37 | 0.00 | 163.94 | 717.71 | 478.24 | Hydrogen refuelling stations; 2024-2027<br>Electric vehicle charging stations; 2023-2028 |
| CCM 7.6 | 127.15 | 0.28 | 0.78 | 128.21 | 0.00 | 116.06 | 146.36 | 17.62 | 2025-2026 |
| **Total** | **3,744.04** | **113.36** | **1.82** | **3,859.22** | **0.00** | **602.76** | **2,826.16** | **1,313.33** | **N/A** |

* Including property, plant and equipment under construction.
** The amounts relate to expenditures already incurred and to be incurred in the future.
*** Including cumulative years of CAPEX Plans for individual projects.

For activity 4.13, the activity period exceeds five years due to the complexity of the project and its innovative technology (a complex of more than a dozen 2G bioethanol units).

In previous years, we adjusted the CAPEX KPI in connection with the issuance of green bonds to finance identified Taxonomy-aligned activities, and published the adjusted KPI. As the financing of projects through the bonds was completed, the Company is not publishing this KPI in the current year.

A key factor behind the change in the CAPEX KPI was the revision of the assessment of project 3.14 *Manufacture of organic basic chemicals* for Taxonomy-alignment, due to a modification of the project's business scope, which made it impossible to confirm its compliance with the TSC.

### OPEX KPI

The OPEX KPI was calculated by dividing the sum of operating expenditure associated with Taxonomy-eligible and Taxonomy-aligned economic activities by total operating expenditure.

The operating expenditure used in calculating the KPI was based on the ORLEN Group's operating expenditure including direct non-capitalised costs related to research and development, building renovation activities, short-term leases, maintenance and repairs, and any other direct costs related to the day-to-day operation of property, plant and equipment. In calculating direct costs related to the day-to-day operation of property, plant and equipment, we took into account maintenance costs, in particular costs of maintenance and repair of machinery, maintenance materials costs, IT costs dedicated to plant maintenance, and service costs.

In preparing our OPEX KPI disclosures for 2025, we exercised the option not to assess activities deemed immaterial – CCM 6.5 *Transport by motorbikes, passenger cars and light commercial vehicles*, CCM 7.2 *Renovation of existing buildings*, and CCM 7.7 *Acquisition and ownership of buildings*. We consider these activities immaterial, as they do not meet the criterion of financial materiality and are administrative in nature.

The OPEX amount also includes the cost of maintenance and repair services provided within the ORLEN Group. The item 'Other' includes mainly operating expenditure incurred in the electricity transmission and distribution activities (CCM 4.9) in relation to tree-cutting services, power grid operation and other maintenance activities. Details of operating expenditures included in the numerator of the OPEX KPI are presented in the table below.

The change in the OPEX KPI was driven primarily by higher operating costs. The largest change was recorded in activity 4.9 *Transmission and distribution of electricity*, due to the increased number of energy offtake points, as described in more detail in Section 4.3 of the Management Board's Report.

Table 49 Quantitative breakdown of amounts included in OPEX [PLN million]

| | Costs |
|---|---|
| Research and development | 0.94 |
| Building renovation measures | 20.44 |
| Non-capitalised leases | 1.91 |
| Maintenance and repair | 143.15 |
| Other | 241.57 |
| **Total OPEX for Taxonomy-aligned economic activities** | 408.01 |

## Significant changes relative to previous year's disclosures

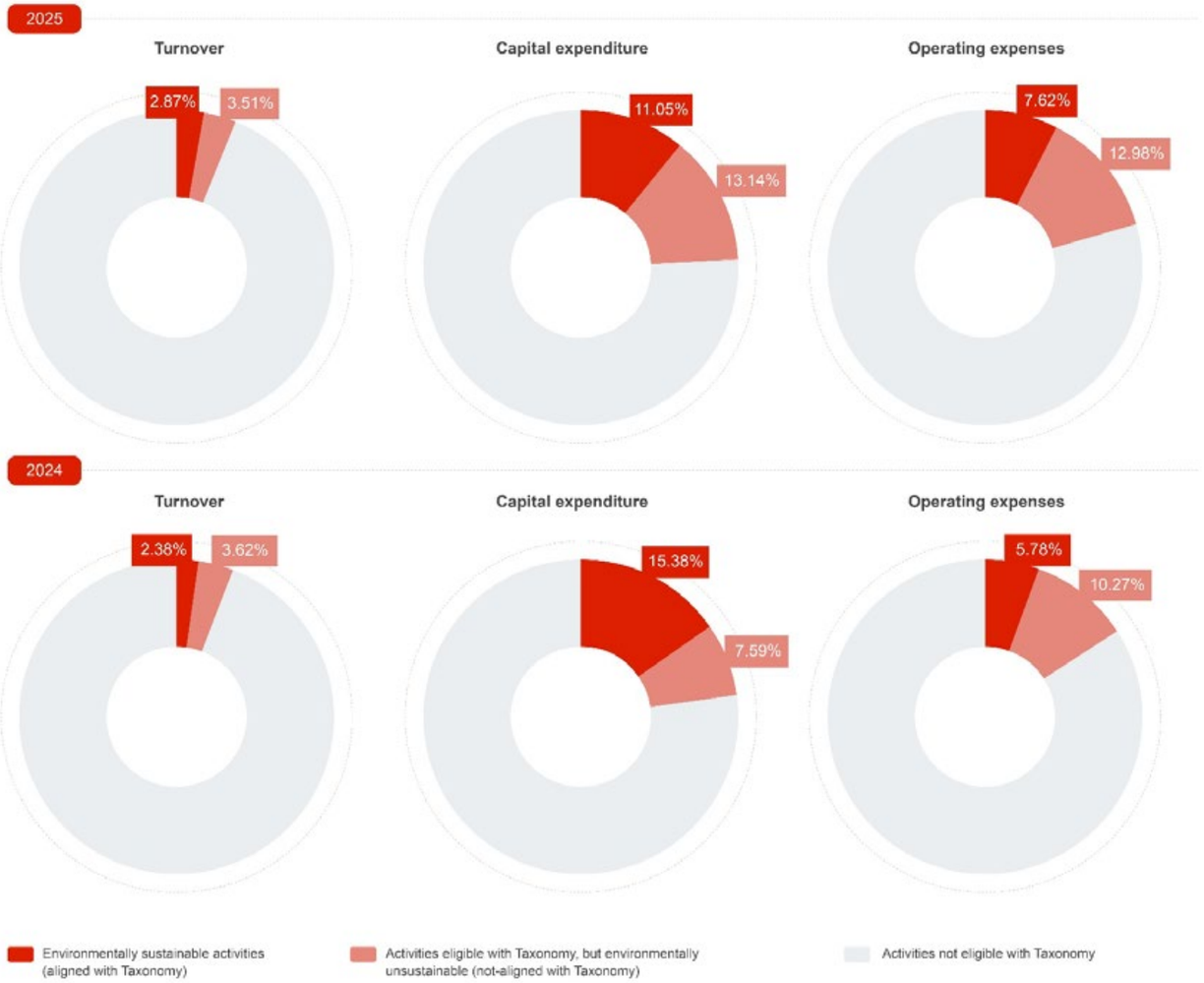
We monitor regulatory developments to ensure ongoing compliance with applicable requirements, including those relating to the Taxonomy. The disclosure tables in this Sustainability Statement differ from those presented last year (for 2024), as we decided to apply the updated reporting templates introduced by Commission Delegated Regulation (EU) 2026/73 effective from 1 January 2026. The Regulation introduced the option to apply materiality thresholds. In line with the principle of proportionality and with a view to reducing the reporting burden, it allows undertakings not to assess whether economic activities are aligned with the Technical Screening Criteria where those activities are not financially material to their business.

## Additional disclosures

The ORLEN Group has joint ventures accounted for with the equity method, such as Basell ORLEN Polyolefins Sp. z o.o. and Baltic Power Sp. z o.o. The CAPEX KPI does not include capital expenditures of PLN 3.22 billion incurred by the ORLEN Group in 2025 on the development of a project to construct a wind farm of Baltic Power Sp. z o.o. Disclosures on additional KPIs related to investments accounted for with the equity method are not required.

## Summary

Chart 34 Taxonomy-alignment of the ORLEN Group's activities



## Table 50 Proportion of Turnover, capital expenditure, and operating expenditure from products or services associated with Taxonomy – eligible or Taxonomy-aligned economic activities – disclosure covering 2025 (summary KPIs)

| Key performance indicator (KPI) | Total | Proportion of Taxonomy-eligible activities | Taxonomy-aligned activities | Proportion of Taxonomy-aligned activities | Breakdown by environmental objectives of Taxonomy-aligned activities | | | | | | Proportion of enabling activities | Proportion of transitional activities | Not assessed activities considered non-material | Taxonomy-aligned activities in previous financial year (2024) | Proportion of Taxonomy-aligned activities in previous financial year (2024) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | Łagodzenie zmian klimatu | Adaptacja do zmian klimatu | Zrównoważone wykorzystywanie i ochrona zasobów wodnych i morskich | Przejście na gospodarkę o obiegu zamkniętym | Zapobieganie zanieczyszczeniu i jego kontrola | Ochrona i odbudowa bioróżnorodności i ekosystemów | | | | | |
| (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) | (11) | (12) | (13) | (14) | (15) | (16) |
| | *PLN million* | % | *PLN million* | % | % | % | % | % | % | % | % | % | % | *PLN million* | % |
| Turnover | 267,827.00 | 6.38% | 7,686.67 | 2.87% | 2.87% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 2.67% | 0.00% | - | 7,028.19 | 2.38% |
| Capital expenditure | 34,902.00 | 24.19% | 3,859.23 | 11.05% | 9.87% | 1.18% | 0.00% | 0.00% | 0.00% | 0.00% | 8.93% | 0.00% | 0.38% | 5,975.11* | 15.38%* |
| Operating expenditure | 5,351.20 | 20.60% | 408.01 | 7.61% | 7.61% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 7.19% | 0.00% | 2.60% | 304.76 | 5.78% |

* The values include activity 3.14 Manufacture of organic basic chemicals, which was assessed as Taxonomy-non-aligned in the current reporting period, as described above. The amount of capital expenditure for this activity was PLN 2,651.55 million.

## Table 51 Proportion of turnover from products or services associated with Taxonomy-eligible or Taxonomy-aligned economic activities – disclosure covering 2025 (activity breakdown)

| Reported key performance indicator (KPI) | Turnover |
|---|---|
| Financial year (N) | 2025 |

| Economic activities | Code | Taxonomy-eligible KPI (Proportion of Taxonomy-eligible Turnover) | Taxonomy-aligned KPI (monetary value of Turnover) | Taxonomy-aligned KPI (proportion of Taxonomy-aligned Turnover) | Environmental objective of Taxonomy-aligned activities | | | | | | Enabling activity | Transitional activity | Proportion of Taxonomy-aligned in Taxonomy-eligible |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | Climate Change Mitigation | Climate Change Adaptation | Sustainable use and protection of water and marine resources | The transition to a circular economy | Pollution prevention and control | Protection and restoration of biodiversity and ecosystems | | | |
| (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) | (11) | (12) | (13) | (14) |
| | | % | *PLN million* | % | % | % | % | % | % | % | *(E where applicable)* | *(T where applicable)* | % |
| Manufacture of carbon black | CCM 3.11 | ***0.02%*** | ***0.00*** | ***0.00%*** | - | - | - | - | - | - | | | ***0.00%*** |
| Manufacture of organic basic chemicals | CCM 3.14 | ***1.20%*** | ***0.00*** | ***0.00%*** | - | - | - | - | - | - | | | ***0.00%*** |
| Manufacture of anhydrous ammonia | CCM 3.15 | ***0.10%*** | ***0.00*** | ***0.00%*** | - | - | - | - | - | - | | | ***0.00%*** |
| Manufacture of plastics in primary form | CCM 3.17 | ***1.20%*** | ***0.00*** | ***0.00%*** | - | - | - | - | - | - | | | ***0.00%*** |

| | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Electricity generation using solar photovoltaic technology* | CCM 4.1 | *0.03%* | *28.59* | *0.01%* | *0.01%* | - | - | - | - | - | | | *33.94%* |
| Electricity generation from wind power | CCM 4.3 | *0.18%* | *120.96* | *0.05%* | *0.05%* | - | - | - | - | - | | | *24.97%* |
| Electricity generation from hydropower | CCM 4.5 | *0.06%* | *0.00* | *0.00%* | - | - | - | - | - | - | | | *0.00%* |
| Transmission and distribution of electricity | CCM 4.9 | *2.58%* | *6,903.22* | *2.58%* | *2.58%* | - | - | - | - | - | *E* | | *99.74%* |
| Storage of electricity | CCM 4.10 | *0.07%* | *195.31* | *0.07%* | *0.07%* | - | - | - | - | - | *E* | | *100.00%* |
| District heating/cooling distribution | CCM 4.15 | *0.04%* | *22.57* | *0.01%* | *0.01%* | - | - | - | - | - | | | *22.11%* |
| Cogeneration of heat/cool and power from bioenergy | CCM 4.20 | *0.13%* | *347.38* | *0.13%* | *0.13%* | - | - | - | - | - | | | *100.00%* |
| Electricity generation from fossil gaseous fuels | CCM 4.29 | *0.01%* | *0.00* | *0.00%* | - | - | - | - | - | - | | | *0.00%* |
| High-efficiency cogeneration of heat/cool and power from fossil gaseous fuels | CCM 4.30 | *0.46%* | *0.00* | *0.00%* | - | - | - | - | - | - | | | *0.00%* |
| Production of heat/cool from fossil gaseous fuels in an efficient district heating/cooling system | CCM 4.31 | *0.20%* | *0.00* | *0.00%* | - | - | - | - | - | - | | | *0.00%* |
| Collection and transport of non-hazardous waste in source segregated fractions | CCM 5.5 | *0.00%* | *5.81* | *0.00%* | *0.00%* | - | - | - | - | - | | | *100.00%* |
| Freight transport services by road | CCM 6.6 | *0.01%* | *0.00* | *0.00%* | - | - | - | - | - | - | | | *0.00%* |
| Infrastructure enabling low-carbon road transport and public transport | CCM 6.15 | *0.01%* | *25.98* | *0.01%* | *0.01%* | - | - | - | - | - | *E* | | *77.13%* |
| Installation, maintenance and repair of renewable energy technologies | CCM 7.6 | *0.01%* | *36.85* | *0.01%* | *0.01%* | - | - | - | - | - | *E* | | *100.00%* |
| Treatment of hazardous waste | CE 2.4 | *0.02%* | *0.00* | *0.00%* | - | - | - | - | - | - | | | *0.00%* |
| Sorting and material recovery of non-hazardous waste | CE 2.7 | *0.05%* | *0.00* | *0.00%* | - | - | - | - | - | - | | | *0.00%* |
| Sum of Taxonomy-aligned activities per objective | | | | | *2.87%* | *0.00%* | *0.00%* | *0.00%* | *0.00%* | *0.00%* | | | |
| Total KPI (turnover) | | 6.38% | 7,686.67 | 2.87% | 2.87% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 2.67% | 0.00% | 44.77% |

## Table 52 Proportion of capital expenditure from products or services associated with Taxonomy-eligible or Taxonomy-aligned economic activities – disclosure covering 2025 (activity breakdown)

| Reported key performance indicator (KPI) | CAPEX | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Financial year (N) | Economic activities | | | | | | | | | | | | |
| | | | | | Taxonomy-aligned KPI (proportion of Taxonomy-aligned CAPEX) | | | | | | | | |
| Działalność gospodarcza | Economic activities | Code | Taxonomy-eligible KPI (proportion of Taxonomy-eligible CAPEX) | Taxonomy-aligned KPI (monetary value of CAPEX) | Climate Change Mitigation | Climate Change Adaptation | Sustainable use and protection of water and marine resources | The transition to a circular economy | Pollution prevention and control | Protection and restoration of biodiversity and ecosystems | Environmental objective of Taxonomy-aligned activities | Enabling activity | Transitional activity |
| (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) | (11) | (12) | (13) | (14) |
| | | % | PLN million | % | % | % | % | % | % | % | (E where applicable) | (T where applicable) | % |
| Manufacture of other low carbon technologies | CCM 3.6 | 0.16% | 0.00 | 0.00% | - | - | - | - | - | - | | | 0.00% |
| Manufacture of hydrogen | CCM 3.10 | 0.09% | 11.38 | 0.03% | 0.03% | - | - | - | - | - | | | 36.93% |
| Manufacture of chlorine | CCM 3.13 | 0.01% | 0.00 | 0.00% | - | - | - | - | - | - | | | 0.00% |
| Manufacture of organic basic chemicals | CCM 3.14 | 3.91% | 0.00 | 0.00% | - | - | - | - | - | - | | | 0.00% |
| Manufacture of anhydrous ammonia | CCM 3.15 | 0.02% | 0.00 | 0.00% | - | - | - | - | - | - | | | 0.00% |
| Manufacture of plastics in primary form | CCM 3.17 | 0.01% | 0.00 | 0.00% | - | - | - | - | - | - | | | 0.00% |
| Electricity generation using solar photovoltaic technology* | CCM 4.1 | 1.13% | 47.57 | 0.14% | 0.14% | - | - | - | - | - | | | 12.07% |
| Electricity generation from wind power | CCM 4.3 | 1.11% | 2.81 | 0.01% | 0.01% | - | - | - | - | - | | | 0.72% |
| Electricity generation from hydropower | CCM 4.5 | 0.04% | 0.00 | 0.00% | - | - | - | - | - | - | | | 0.00% |
| Electricity generation from bioenergy | CCM 4.8 | 0.02% | 0.00 | 0.00% | - | - | - | - | - | - | | | 0.00% |
| Transmission and distribution of electricity | CCM 4.9 | 7.96% | 2,770.47 | 7.94% | 7.94% | - | - | - | - | - | E | | 99.76% |
| Transmission and distribution of electricity | CCA 4.9 | 1.18% | 413.53 | 1.18% | - | 1.18% | - | - | - | - | | | 100.00% |
| Storage of electricity | CCM 4.10 | 0.00% | 1.45 | 0.00% | 0.00% | - | - | - | - | - | E | | 100.00% |
| Storage of thermal energy | CCM 4.11 | 0.11% | 37.62 | 0.11% | 0.11% | - | - | - | - | - | E | | 100.00% |
| Manufacture of biogas or biofuels for use in transport and of bioliquids | CCM 4.13 | 1.99% | 182.58 | 0.52% | 0.52% | - | - | - | - | - | | | 26.33% |
| Transmission and distribution networks for renewable and low-carbon gases | CCM 4.14 | 0.00% | 1.60 | 0.00% | 0.00% | - | - | - | - | - | | | 100.00% |
| District heating/cooling distribution | CCM 4.15 | 0.47% | 2.02 | 0.01% | 0.01% | - | - | - | - | - | | | 1.24% |
| Installation and operation of electric heat pumps | CCM 4.16 | 0.01% | 2.34 | 0.01% | 0.01% | - | - | - | - | - | | | 72.33% |

| | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Cogeneration of heat/cool and power from bioenergy | CCM 4.20 | ***0.03%*** | ***6.91*** | ***0.02%*** | ***0.02%*** | - | - | - | - | - | | | ***65.55%*** |
| Production of heat/cool from bioenergy | CCM 4.24 | ***0.20%*** | ***71.37*** | ***0.20%*** | ***0.20%*** | - | - | - | - | - | | | ***100.00%*** |
| Production of heat/cool using waste heat | CCM 4.25 | ***0.03%*** | ***0.00*** | ***0.00%*** | - | - | - | - | - | - | | | ***0.00%*** |
| Electricity generation from fossil gaseous fuels | CCM 4.29 | ***3.04%*** | ***0.00*** | ***0.00%*** | - | - | - | - | - | - | | | ***0.00%*** |
| High-efficiency cogeneration of heat/cool and power from fossil gaseous fuels | CCM 4.30 | ***1.13%*** | ***0.00*** | ***0.00%*** | - | - | - | - | - | - | | | ***0.00%*** |
| Production of heat/cool from fossil gaseous fuels in an efficient district heating/cooling system | CCM 4.31 | ***0.03%*** | ***0.00*** | ***0.00%*** | - | - | - | - | - | - | | | ***0.00%*** |
| Construction, extension and operation of water collection, treatment and supply systems | CCM 5.1 | ***0.01%*** | ***0.00*** | ***0.00%*** | - | - | - | - | - | - | | | ***0.00%*** |
| Renewal of water collection, treatment and supply systems | CCM 5.2 | ***0.29%*** | ***0.00*** | ***0.00%*** | - | - | - | - | - | - | | | ***0.00%*** |
| Construction, extension and operation of waste water collection and treatment | CCM 5.3 | ***0.01%*** | ***0.00*** | ***0.00%*** | - | - | - | - | - | - | | | ***0.00%*** |
| Renewal of waste water collection and treatment | CCM 5.4 | ***0.08%*** | ***0.00*** | ***0.00%*** | - | - | - | - | - | - | | | ***0.00%*** |
| Freight rail transport | CCM 6.2 | ***0.02%*** | ***0.00*** | ***0.00%*** | - | - | - | - | - | - | | | ***0.00%*** |
| Freight transport services by road | CCM 6.6 | ***0.08%*** | ***0.00*** | ***0.00%*** | - | - | - | - | - | - | | | ***0.00%*** |
| Infrastructure enabling low-carbon road transport and public transport | CCM 6.15 | ***0.54%*** | ***179.37*** | ***0.51%*** | ***0.51%*** | - | - | - | - | - | ***E*** | | ***94.69%*** |
| Installation, maintenance and repair of renewable energy technologies | CCM 7.6 | ***0.37%*** | ***128.21*** | ***0.37%*** | ***0.37%*** | - | - | - | - | - | ***E*** | | ***99.65%*** |
| Production of alternative water resources for purposes other than human consumption | CE 2.2 | ***0.01%*** | ***0.00*** | ***0.00%*** | - | - | - | - | - | - | | | ***0.00%*** |
| Treatment of hazardous waste | CE 2.4 | ***0.05%*** | ***0.00*** | ***0.00%*** | - | - | - | - | - | - | | | ***0.00%*** |
| Sorting and material recovery of non-hazardous waste | CE 2.7 | ***0.05%*** | ***0.00*** | ***0.00%*** | - | - | - | - | - | - | | | ***0.00%*** |
| Sum of Taxonomy-aligned activities per objective | | | | | | 9.87% | 1.18% | 0.00% | 0.00% | 0.00% | 0.00% | | |
| Total KPI (CAPEX) | | 24.19% | ***3,859.23*** | 11.05% | 9.87% | 1.18% | 0.00% | 0.00% | 0.00% | 0.00% | 8.93% | 0.00% | 45.70% |

## Table 53 Proportion of operating expenditure from products or services associated with Taxonomy-eligible or Taxonomy-aligned economic activities – disclosure covering 2025 (activity breakdown)

| Reported key performance indicator (KPI) | OPEX |
|---|---|
| Financial year (N) | 2025 |

| Economic activities | Code | Taxonomy-eligible KPI (Proportion of Taxonomy-eligible OPEX) | Taxonomy-aligned KPI (monetary value of OPEX) | Taxonomy-aligned KPI (Proportion of Taxonomy-aligned OPEX) | Environmental objective of Taxonomy-aligned activities | | | | | | Enabling activity | Transitional activity | Proportion of Taxonomy-aligned in Taxonomy-eligible |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | Climate Change Mitigation | Climate Change Adaptation | Sustainable use and protection of water and marine resources | The transition to a circular economy | Pollution prevention and control | Protection and restoration of biodiversity and ecosystems | | | |
| (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) | (11) | (12) | (13) | (14) |
| | | % | PLN million | % | % | % | % | % | % | % | (E where applicable) | (T where applicable) | % |
| Manufacture of hydrogen | CCM 3.10 | 0.28% | 0.25 | 0.00% | 0.00% | - | - | - | - | - | | | 1.64% |
| Manufacture of carbon black | CCM 3.11 | 0.10% | 0.00 | 0.00% | - | - | - | - | - | - | | | 0.00% |
| Manufacture of chlorine | CCM 3.13 | 0.14% | 0.00 | 0.00% | - | - | - | - | - | - | | | 0.00% |
| Manufacture of organic basic chemicals | CCM 3.14 | 2.07% | 0.00 | 0.00% | - | - | - | - | - | - | | | 0.00% |
| Manufacture of anhydrous ammonia | CCM 3.15 | 0.42% | 0.00 | 0.00% | - | - | - | - | - | - | | | 0.00% |
| Manufacture of nitric acid | CCM 3.16 | 0.25% | 0.00 | 0.00% | - | - | - | - | - | - | | | 0.00% |
| Manufacture of plastics in primary form | CCM 3.17 | 2.26% | 0.00 | 0.00% | - | - | - | - | - | - | | | 0.00% |
| Electricity generation using solar photovoltaic technology* | CCM 4.1 | 0.29% | 2.31 | 0.04% | 0.04% | - | - | - | - | - | | | 14.90% |
| Electricity generation from wind power | CCM 4.3 | 2.33% | 11.47 | 0.21% | 0.21% | - | - | - | - | - | | | 9.19% |
| Electricity generation from hydropower | CCM 4.5 | 0.49% | 0.00 | 0.00% | - | - | - | - | - | - | | | 0.00% |
| Electricity generation from bioenergy | CCM 4.8 | 0.05% | 0.00 | 0.00% | - | - | - | - | - | - | | | 0.00% |
| Transmission and distribution of electricity | CCM 4.9 | 7.18% | 377.46 | 7.05% | 7.05% | - | - | - | - | - | E | | 98.23% |
| Storage of electricity | CCM 4.10 | 0.06% | 3.19 | 0.06% | 0.06% | - | - | - | - | - | E | | 100.00% |
| Manufacture of biogas or biofuels for use in transport and of bioliquids | CCM 4.13 | 0.29% | 0.00 | 0.00% | 0.00% | - | - | - | - | - | | | 0.00% |
| District heating/cooling distribution | CCM 4.15 | 0.16% | 0.10 | 0.00% | 0.00% | - | - | - | - | - | | | 1.24% |
| Cogeneration of heat/cool and power from bioenergy | CCM 4.20 | 0.17% | 7.95 | 0.15% | 0.15% | - | - | - | - | - | | | 85.18% |
| Electricity generation from fossil gaseous fuels | CCM 4.29 | 0.23% | 0.00 | 0.00% | - | - | - | - | - | - | | | 0.00% |

| | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| High-efficiency cogeneration of heat/cool and power from fossil gaseous fuels | CCM 4.30 | *1.67%* | *0.00* | *0.00%* | - | - | - | - | - | - | | | *0.00%* |
| Production of heat/cool from fossil gaseous fuels in an efficient district heating/cooling system | CCM 4.31 | *0.09%* | *0.00* | *0.00%* | - | - | - | - | - | - | | | *0.00%* |
| Construction, extension and operation of water collection, treatment and supply systems | CCM 5.1 | *0.47%* | *0.00* | *0.00%* | - | - | - | - | - | - | | | *0.00%* |
| Construction, extension and operation of waste water collection and treatment | CCM 5.3 | *0.01%* | *0.00* | *0.00%* | - | - | - | - | - | - | | | *0.00%* |
| Collection and transport of non-hazardous waste in source segregated fractions | CCM 5.5 | *0.02%* | *1.08* | *0.02%* | *0.02%* | - | - | - | - | - | | | *100.00%* |
| Freight rail transport | CCM 6.2 | *0.38%* | *0.00* | *0.00%* | - | - | - | - | - | - | | | *0.00%* |
| Freight transport services by road | CCM 6.6 | *0.10%* | *0.00* | *0.00%* | - | - | - | - | - | - | | | *0.00%* |
| Infrastructure enabling low-carbon road transport and public transport | CCM 6.15 | *0.08%* | *3.73* | *0.07%* | *0.07%* | - | - | - | - | - | *E* | | *91.58%* |
| Installation, maintenance and repair of renewable energy technologies | CCM 7.6 | *0.01%* | *0.47* | *0.01%* | *0.01%* | - | - | - | - | - | *E* | | *100.00%* |
| Production of alternative water resources for purposes other than human consumption | CE 2.2 | *0.37%* | *0.00* | *0.00%* | - | - | - | - | - | - | | | *0.00%* |
| Treatment of hazardous waste | CE 2.4 | *0.27%* | *0.00* | *0.00%* | - | - | - | - | - | - | | | *0.00%* |
| Sorting and material recovery of non-hazardous waste | CE 2.7 | *0.04%* | *0.00* | *0.00%* | - | - | - | - | - | - | | | *0.00%* |
| Treatment of hazardous waste | PPC 2.2 | *0.16%* | *0.00* | *0.00%* | - | - | - | - | - | - | | | *0.00%* |
| Remediation of contaminated sites and areas | PPC 2.4 | *0.15%* | *0.00* | *0.00%* | - | - | - | - | - | - | | | *0.00%* |
| Water supply | WTR 2.1 | *0.01%* | *0.00* | *0.00%* | - | - | - | - | - | - | | | *0.00%* |
| Sum of Taxonomy-aligned activities per objective | | | | | 7.61% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | | | |
| Total KPI (OPEX) | | 20.60% | 408.01 | 7.61% | 7.61% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 7.19% | 0.00% | 37.01% |

## 6.3 Climate change [ESRS E1]

Climate change is a key strategic challenge, material to the long-term resilience of our business model, competitiveness and value creation.

In 2020, we committed to achieving climate neutrality by 2050, as reaffirmed in the ORLEN 2035 Strategy, thereby setting a clear long-term direction for our transformation.

This ambition is delivered through coordinated climate mitigation actions across our own operations and our value chain, including Scopes 1, 2 and 3 greenhouse gas emissions.

Our goal of achieving climate neutrality by 2050 is aligned with the Paris Agreement objective to limit global temperature increase to below 2°C above pre-industrial levels, while pursuing efforts to limit it to 1.5°C, as well as with EU climate policy, including the European Green Deal, which targets climate neutrality by 2050.

### Climate governance

Decarbonisation and the energy transition are key strategic priorities within our corporate governance framework, underpinning the long-term resilience of our business model, value creation and alignment with EU climate policy. These matters are taken into account in decision-making at both management and supervisory levels, and form a core of our ORLEN 2035 Strategy[4], the Climate Policy[5], ORLEN Transition Plan[6], and the Climate pillar of our Sustainable Development Strategy[7].

[4] ORLEN 2035 Strategy
[5] ORLEN Group Climate Policy
[6] ORLEN Transition Plan
[7] ORLEN Group Sustainable Development Strategy

Oversight of climate and sustainability matters rests with the Company's highest governing bodies, including the Management Board and the Supervisory Board, which ensures their integration into strategic planning, risk and opportunity management, and capital allocation decisions. We view decarbonisation and the energy transition not only as regulatory requirements, but also as drivers of our long-term growth, new business lines, low- and zero-carbon technologies and enhanced competitiveness. Emission reduction targets are an integral part of our ORLEN 2035 Strategy, approved by the Management Board and the Supervisory Board. Progress in its implementation is reported regularly to the governing bodies.

Decarbonisation and energy transition objectives are also reflected in the variable remuneration framework for senior management. A portion of the remuneration of the Management Board and key management personnel is linked to the achievement of sustainability and energy transition objectives, including emission reduction targets and the implementation of the ORLEN Transition Plan. This directly aligns management accountability with the Group's long-term climate ambition and stakeholder expectations.

For further details on the integration of sustainability-related performance targets into our remuneration system and on greenhouse gas emission reduction targets, see disclosure GOV-3.

### 6.3.1 Transition plan for climate change mitigation [E1-1]

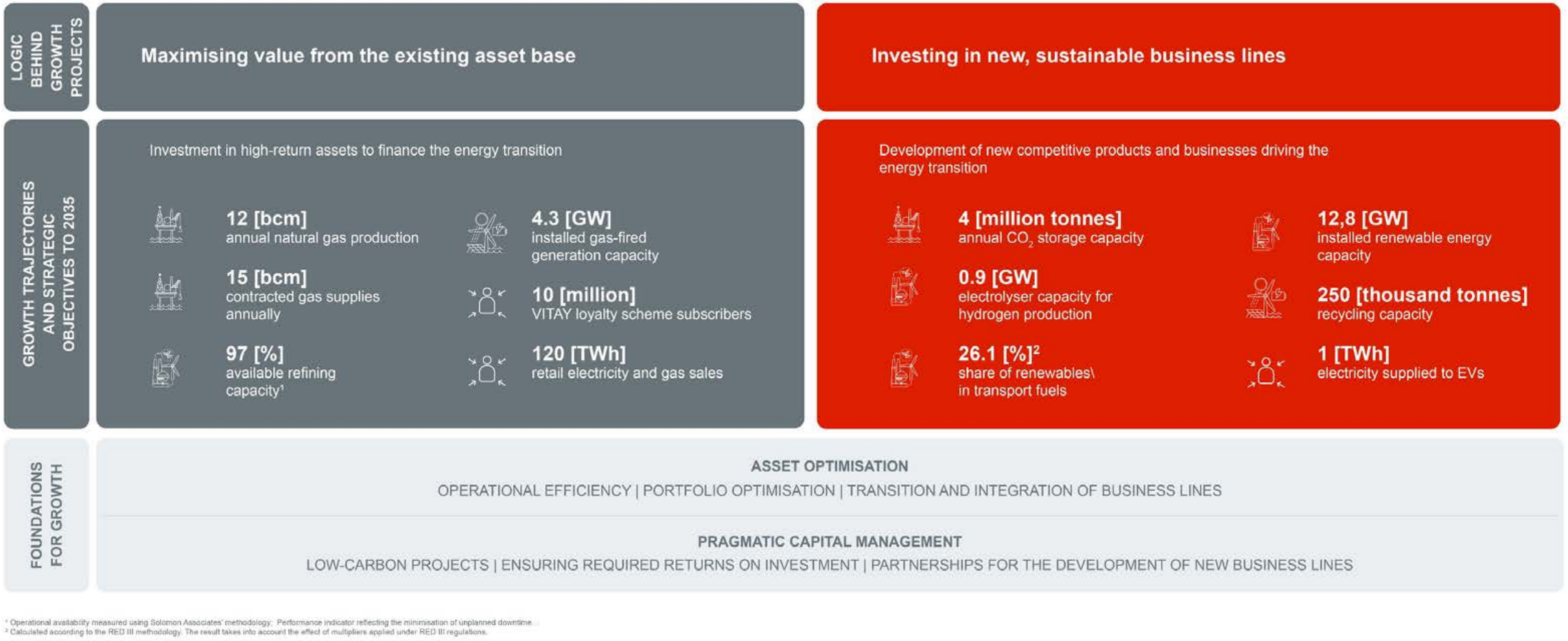
#### ORLEN Transition Plan

As part of our pathway to climate neutrality, we have developed and published the ORLEN Transition Plan, setting out our priorities, actions and investments supporting the energy transition and progress towards the climate neutrality goal[8].

The Plan complements the ORLEN 2035 Strategy, published in early 2025, which defines our development path to 2035. Sustainability underpins our long-term business growth and is anchored in the energy transition.

[8] The ORLEN Transition Plan was adopted by the ORLEN S.A. Management Board on 8 April 2025, as recorded in Minutes No. 1469/25 of the Management Board meeting, and by the Sustainability Committee of the Company's Supervisory Board on 15 April 2025.

## Strategic rationale for the transition




¹ Operational availability measured using Solomon Associates' methodology; Performance indicator reflecting the minimisation of unplanned downtime.
² Calculated according to the RED III methodology. The result takes into account the effect of multipliers applied under RED III regulations.

As natural plays a key role in the process of phasing out coal in Central Europe, we intend to further diversify our supply sources and increase own oil and gas production and supply volumes to support broader use of natural gas in the Energy segment and strengthen regional energy security.

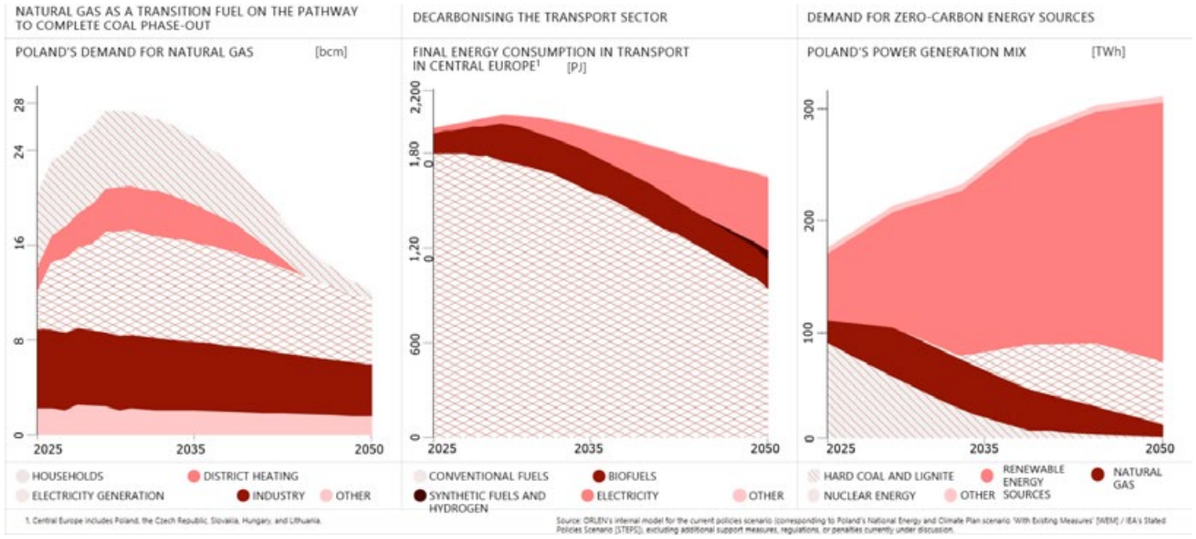
With regard to crude oil, and petroleum-based fuels in particular, which continue to play an important role in transport, we intend to keep refining throughput at a level consistent with regional demand for conventional fuels, in line with the scenarios adopted for our strategic planning, as described in

disclosure ESRS 2 SBM-3. At the same time, those scenarios assume a gradual increase in the share of renewable energy in transport, both in the form of electricity and other alternative fuels.

In parallel, we are developing new business areas, including CCUS, alternative fuels, mechanical and chemical recycling, renewable energy, nuclear power based on SMR technology, and energy storage.

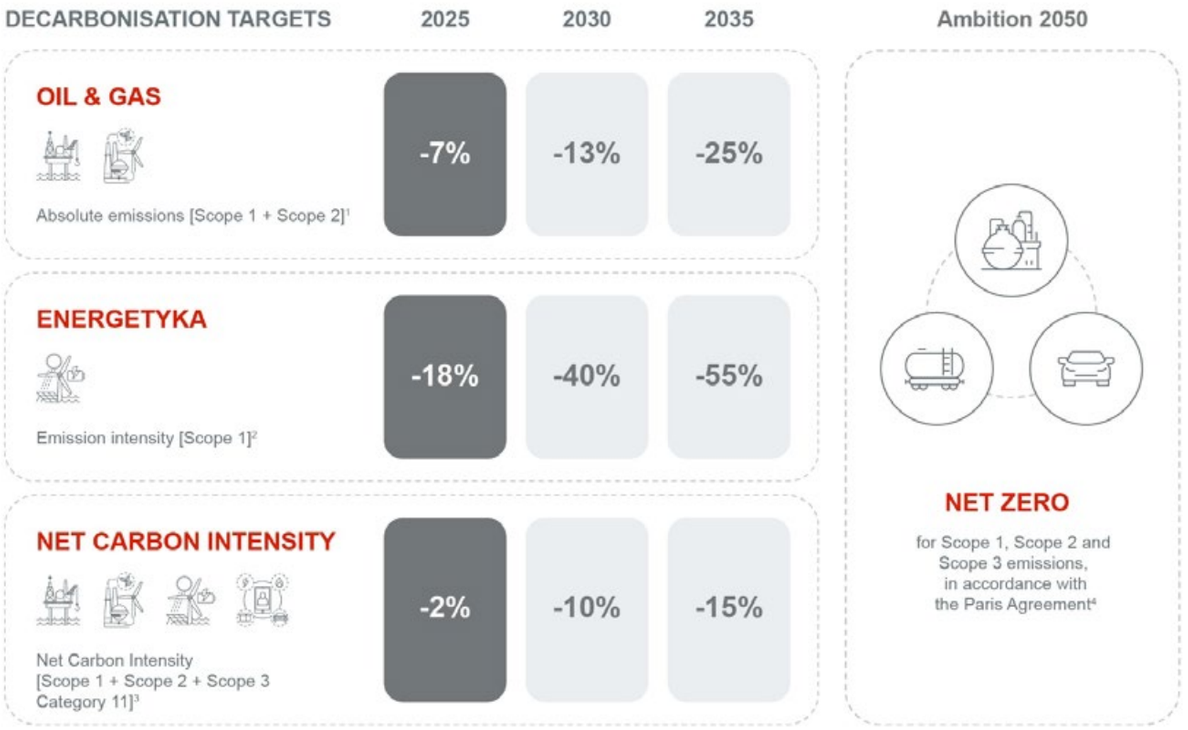
By 2035, we plan to fully phase out coal-based energy generation, with coal exiting the power generation mix by the end of 2030, in line with the Net Zero Emissions scenario[9].

Chart 35 Key assumptions of the ORLEN Transition Plan for the energy transition process




## Decarbonisation targets

Our emission reduction targets, described in detail in disclosure E1-4, are a central component of the ORLEN Transition Plan and set out a measurable pathway for transforming our business towards a low- and zero-carbon economy. The short-, medium- and long-term targets support a phased reduction of greenhouse gas emissions across our key business segments, while preserving our energy security and financial stability. Their delivery helps align our operational, investment and technology initiatives with the ambition of achieving climate neutrality by 2050.




8 Based on the Net Zero Emissions scenario developed by the International Energy Agency and published in *World Energy Outlook 2025*.

## Alignment with 1.5°C pathway

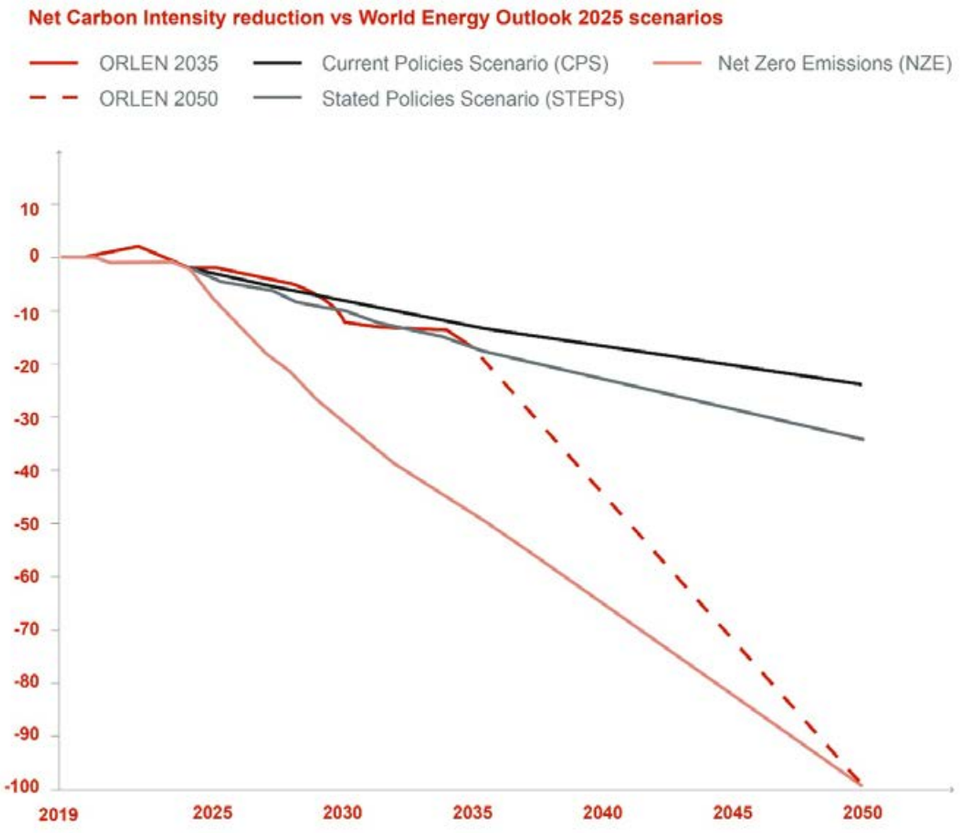
We have set a long-term ambition for the ORLEN Group to achieve climate neutrality by 2050. At the same time, our emissions reduction pathway for Scope 1 and 2 emissions to 2030 and 2035 is aligned with a warming scenario above 2°C, while our near-term Scope 3 targets are aligned with a scenario above 2.5°C[10]. This reflects the continued material role of fossil fuels in our business model, including the development of natural gas production and the ongoing operation of our refining assets. As a result, emissions across our value chain, particularly Scope 3 (Category 11 – Use of sold products), which dominates our emissions profile, remain relatively high.

The pace at which we reduce our emissions is closely tied to the pace of the energy transition in Central Europe. The region remains highly dependent on fossil fuels, with a strong need to ensure energy security and limited availability of stable low-carbon alternatives in the short to medium term. In this context, natural gas serves as a transition fuel, while existing refining assets remain essential for maintaining energy and fuel supply. At the same time, economic convergence, relatively high energy intensity of GDP, and the need to sustain growth continue to drive demand for reliable and accessible energy in the region.

Our transition plan assumes continued use of natural gas as a transition fuel and the development of gas-fired generation, including CCGT units, to support energy security and system stability in Central Europe. While these measures contribute to lowering emissions intensity of the domestic energy mix, from the perspective of the ORLEN Group as the reporting entity, they limit our ability to achieve emissions reductions in line with the pace of decarbonisation assumed under a 1.5°C scenario, which requires faster and deeper reductions in fossil fuel use.

By 2035, based on reductions measured using the Net Carbon Intensity indicator – which in the 2019 base year covered 75% of the ORLEN Group's Scope 1 and 2 emissions and 75% of Scope 3 Category 11 emissions – we expect to decarbonise at a pace broadly consistent with the IEA Stated Policies Scenario. The ORLEN 2035 Strategy and the ORLEN Transition Plan do not preclude achieving climate neutrality by 2050. Rather, they focus on enabling key investment decisions while maintaining flexibility for further transformation activities in the period 2036–2050. This reflects a phased approach to decarbonisation, with full alignment with a 1.5°C pathway expected beyond 2035.

Chart 36 Net Carbon Intensity reduction vs World Energy Outlook 2025 scenarios




Source: in-house analysis based on World Energy Outlook 2025.

The primary benchmarks for assessing the ORLEN Group's climate targets are provided by the International Energy Agency's (IEA) scenarios set out in the World Energy Outlook, widely recognised as a credible source of long-term outlooks for the energy sector, in which we operate as an integrated energy group.

[10] In accordance with Moody's methodology and assessment contained in Second_Party_Opinion.

The analysis is based on a comparison of the ORLEN Group's Net Carbon Intensity (NCI) against three IEA scenarios: the Current Policies Scenario (CPS) and the Stated Policies Scenario (STEPS), which reflect current and planned climate policies, respectively, as well as the Net Zero Emissions (NZE) scenario, which is aligned with a pathway limiting the increase in average global temperature to 1.5°C. For the purpose of presenting our emission reduction pathway, historical values were averaged for years where complete data was not available, making it possible to establish 2019 as the base year.

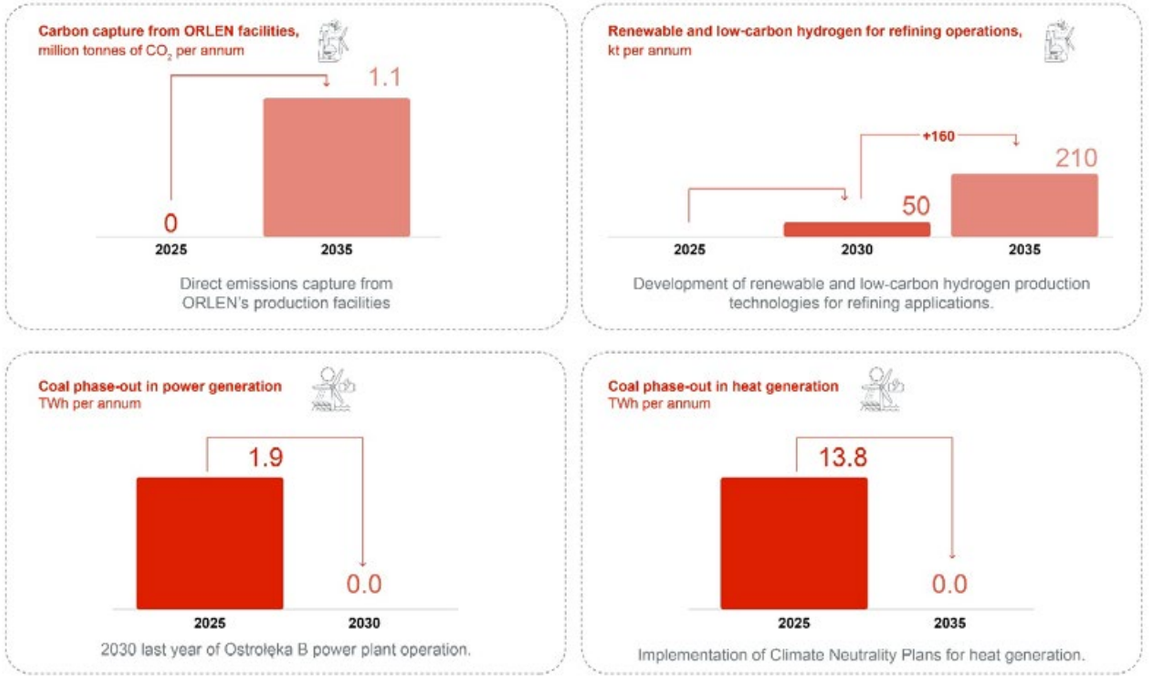
As shown in the chart, our NCI trajectory to 2030 and 2035 is broadly aligned with the STEPS scenario. Over the longer term, assuming climate neutrality is achieved by 2050, it converges with the more ambitious NZE pathway.

Our long-term climate ambition remains aligned with the Paris Agreement objective of limiting global temperature increase to well below 2°C above pre-industrial levels, while pursuing efforts to limit it to 1.5°C. Its delivery, however, will depend on further technological progress, the regulatory environment and demand-side developments shaping the pace of the energy transition, particularly in relation to value chain emissions. At the same time, the targets and actions planned to 2035 represent a transitional phase in our energy transition and will support the development of the operational and technological capabilities required for further emissions reductions beyond 2035. This includes the growing role of zero-carbon energy sources, the development of CCUS technologies, and initiatives to reduce emissions in hard-to-abate sectors, including transport.

Table 54 ORLEN's emission reduction pathway against IEA's Net Zero Emissions (NZE) scenario

| | | 2030 vs 2019 | 2035 vs 2019 | 2050 vs 2019 |
|---|---|---|---|---|
| **IEA's Net Zero Emissions scenario** | **Emissions**<br>Total emissions in NZE scenario | -31% | -51% | -100% |
| | **Energy supply**<br>Total energy supply in NZE scenario | 0% | -6% | -6% |
| | **Emissions/energy supply** | -31% | -48% | -100% |
| **ORLEN** | **Emissions**<br>Absolute Scope 1, Scope 2 and Scope 3 emissions included in NCI | -3% | -4% | Net Zero ambition |
| | **Energy supply**<br>ORLEN Group's energy supply included in NCI | +10% | +13% | |
| | **Net Carbon Intensity** (gross) | -10% (10%) | -15% (-15%) | |

## Selected decarbonisation levers in own operations[11]

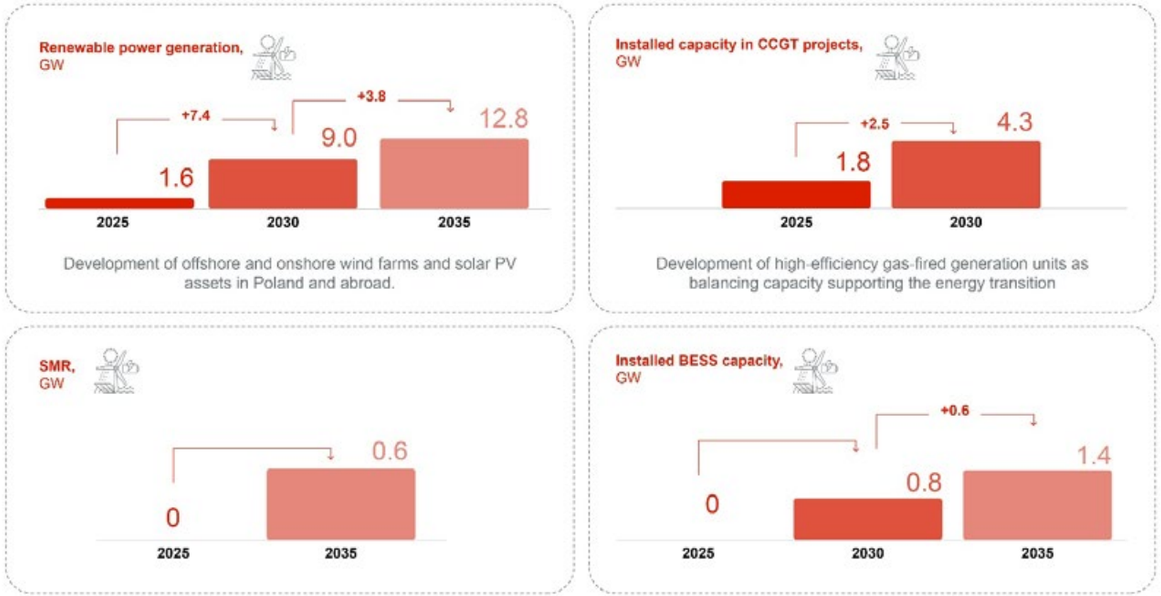



[11] In-house analysis based on the ORLEN 2035 Strategy.

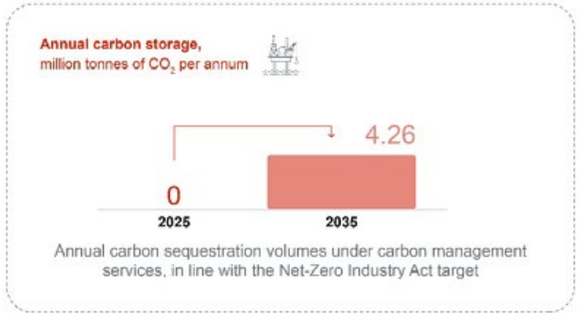
## Table 55 Key decarbonisation actions of the ORLEN Group to 2035

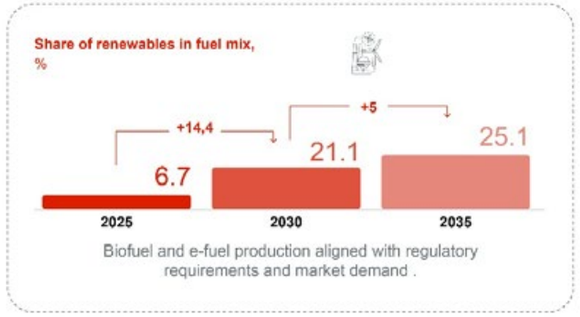
| Lever | Action | Time horizon |
|---|---|---|
| Transformation of the Downstream segment | Reduction of emissions from our Downstream operations through energy efficiency improvements, asset modernisation and use of lower-carbon energy sources, leading to a sustained decrease in emissions intensity of the refining and petrochemical assets | Ongoing |
| Reduction of methane emissions | Implementation of a methane emissions reduction programme targeting Near-Zero Upstream Methane Emissions from operations that are under the control of ORLEN Group companies acting as project operators | By 2030 |
| End of routine flaring | Elimination of routine flaring in upstream operations that are under the control of ORLEN Group companies acting as project operators | By 2030 |
| Coal phase-out and transformation of heat generation assets | Decommissioning of the Ostrołęka B power plant and decarbonisation of the heat generation assets | Power generation: by the end of 2030; Heat generation: by 2035 |
| Carbon capture, utilisation and storage (CCUS) | Capture of direct $CO_2$ emissions from own installations through CCUS projects | By 2035 |
| Renewable and low-carbon hydrogen | Development of production and utilisation of low-carbon and renewable hydrogen (as part of measures undertaken to comply with RED III); actions supported by National Recovery and Resilience Plan funding, contributing to emissions reductions in the Downstream segment | By 2035 |

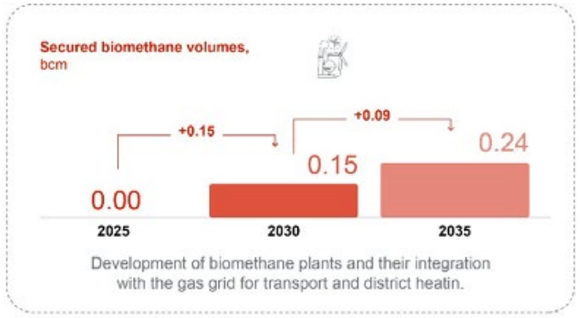
## Selected transition levers in own operations[12]




[12] Opracowanie własne na podstawie Strategii ORLEN 2035.



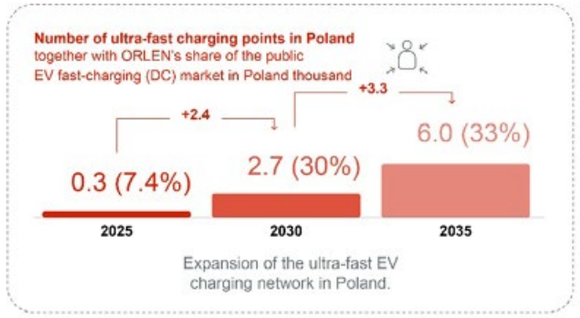




Table 56 Key transition actions of the ORLEN Group to 2035

| Lever | Action | Time horizon |
|---|---|---|
| **Renewable energy sources (RES)** | Rapid expansion of renewable energy assets in Poland and internationally, including onshore and offshore wind and solar, to achieve a marked increase in installed capacity and renewable energy output | Ongoing |
| **Gas-fired generation (CCGT)** | Development of high-efficiency CCGT units to support coal phase-out and, in the longer term, electricity system balancing and integration of growing renewable energy volumes | Ongoing |
| **Energy storage (BESS)** | Development of energy storage to enhance electricity system flexibility and support integration of growing renewable energy volumes | Ongoing |
| **Sustainable transport** | Increase in the share of renewable energy in the fuel mix through biofuels (including HVO) and low- and zero-carbon electricity | Ongoing |
| **E-mobility** | Expansion of the electric vehicle charging network to support emissions reduction in transport and increased use of zero-carbon energy | Ongoing |
| **Biogas and biomethane** | Commissioning of a pilot biomethane plant and progressive scaling of secured biomethane volumes In the longer term, decarbonisation of the value chain through the use of biogas and biomethane in transport and own operations | Pilot by 2030; scale-up by 2035 |
| **Small modular reactors (SMR)** | Preparation and development of SMR projects as a stable, zero-carbon energy source supporting long-term decarbonisation | By 2035 |
| **Carbon capture, utilisation and storage (CCUS)** | Development of $CO_2$ storage operations (carbon management services), enabling $CO_2$ storage for third parties, in line with the Net Zero Industry Act | By 2035 |

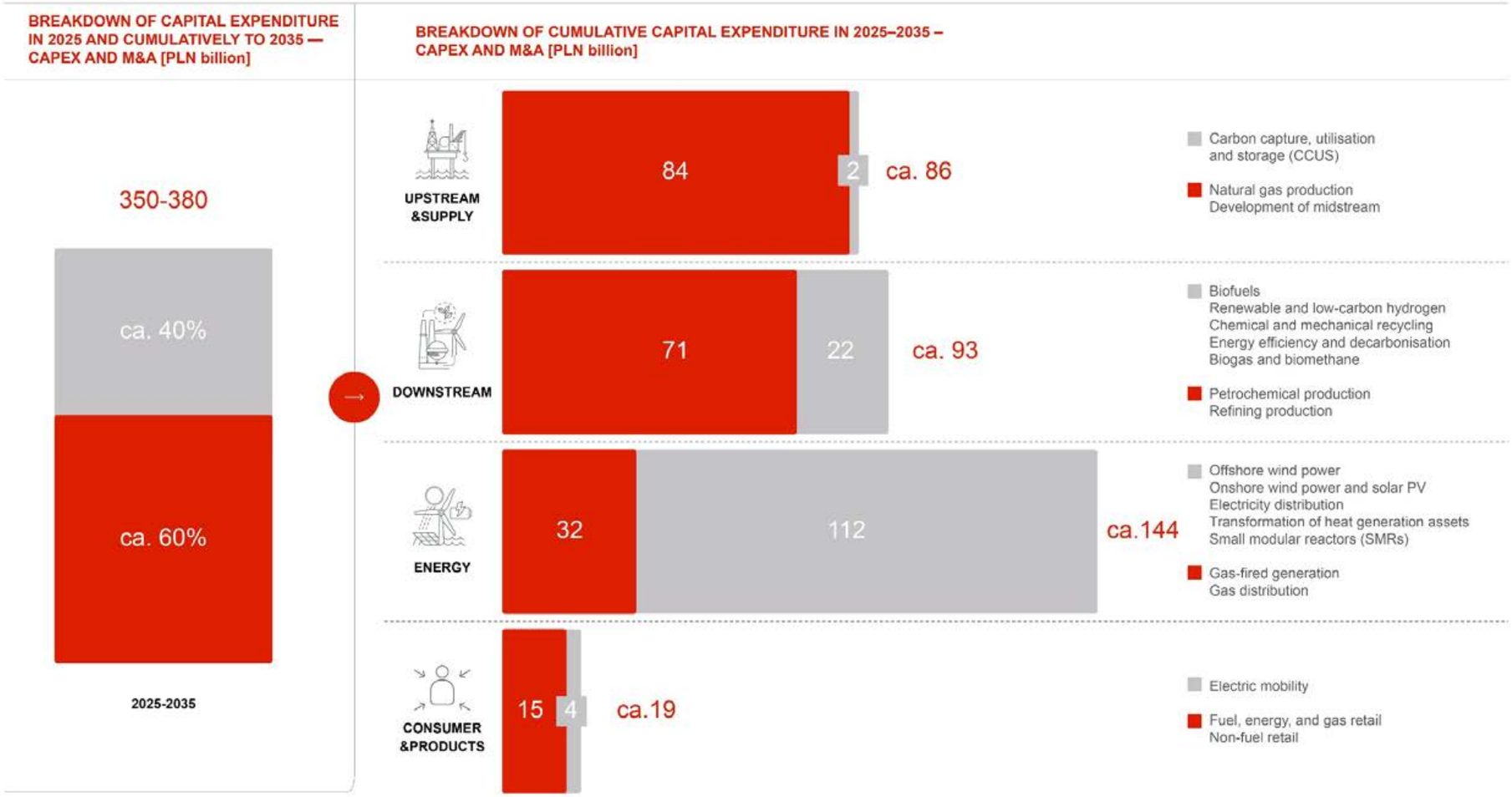
## Energy transition financing

Planned capital expenditure under the ORLEN 2035 Strategy will support delivery of the ORLEN Transition Plan. We anticipate cumulative CAPEX and merger and acquisition spending of PLN 350–380 billion in 2025–2035, covering both growth projects and maintenance of existing assets[13].

Approximately 40% of the expenditure will be allocated to low-carbon projects, leading to the creation of a sustainable product portfolio and supporting the implementation of our transition plan.

[13] The ORLEN Group is excluded under Article 12 of Commission Delegated Regulation (EU) 2020/1818 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as regards minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks.

Figure 17 Breakdown of capital expenditure to 2035[14]




[14] Źródło: ORLEN Transition Plan

Table 57 Breakdown of capital expenditures by ORLEN's key activities, in accordance with the Taxonomy classification and NACE codes for oil-, gas- and coal-related activities.

| Segment | ORLEN Group operations | Taxonomy | Oil, gas and coal (according to NACE codes) |
|---|---|---|---|
| Upstream & Supply | CCUS | - | - |
| | Exploration and production of crude oil and gas | - | B.05, B.06, B.09<br>Limitted to crude oil<br>(26% of all total production in year 2025) |
| | Wholesale of crude oil and gas | - | - |
| Downstream | Production and refinery trade | - | C.19, G46.71 |
| | Production and petrochemical trade | - | - |
| | Biofuels and biogas | CCM 4.13 | - |
| | Renewable and low-carbon hydrogen | CCM 3.10<br>CCM 6.15 | - |
| | Chemical and mechanical recycling | CE 2.7 | - |
| | Energy efficiency | CCM 4.25 | - |
| Energy | Commercial power generation (including development of CCGT) | CCM 4.29 | D.35.1 |
| | Offshore wind (including unconsolidated investments) | CCM 4.3 | - |
| | Onshore wind and solar PV | CCM 4.1<br>CCM 4.3<br>CCM 4.16<br>CCM 7.6 | - |
| | Transformation of heat generation assets | CCM 4.11<br>CCM 4.15<br>CCM 4.16<br>CCM 4.20<br>CCM 4.24<br>CCM 4.25<br>CCM 4.30 | D.35.3<br>Limitted to coal<br>(59% of total production in district heating in year 2025) |
| | | CCM 4.31 | |
| | Small Modular Reactors SMR | - | - |
| | Storage of electricity | CCM 4.10 | - |
| | Electricity distribution | CCM 4.9 | - |
| | Electricity trading | | - |
| | Energy services | | - |
| | Gas distribution | | - |
| Consumers & Prodcuts | Fuel retail | - | - |
| | E-mobility | CCM 6.15 | - |
| | Energy and gas retail | | - |
| | Non-fuel retail | - | - |

The remaining 60% of capital expenditure relates primarily to the continued development of our natural gas operations, including gas production, import and its use as a fuel in the energy sector, as well as to the maintenance and modernisation of our petrochemical and refining production assets, including the New Chemistry project. It also includes maintenance CAPEX across existing assets in all business segments.

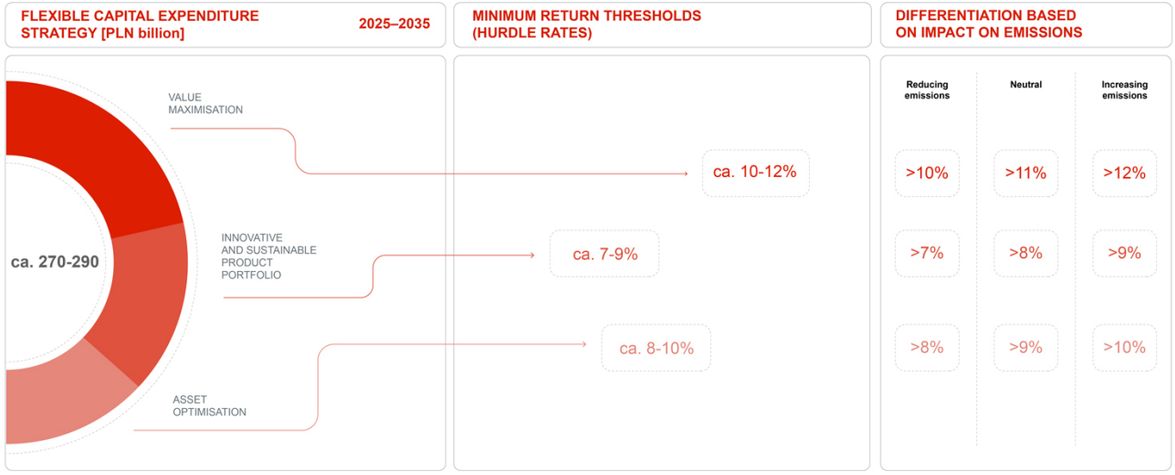
The development of gas-fired power generation (high-efficiency CCGT units) was not classified as low-carbon in the cumulative CAPEX breakdown for 2025–2035 presented in Figure 17. However, these projects contribute to lowering the emissions intensity in energy generation (kg $CO_2$e/MWh) and the Net Carbon Intensity (NCI, g $CO_2$e/MJ). They are also eligible under the EU Taxonomy as CCM 4.29 – Electricity generation from fossil gaseous fuels.

At the same time, some investments classified as low-carbon in the cumulative CAPEX breakdown for 2025–2035 in Figure 18 are not included in the CAPEX KPI under the EU Taxonomy. This applies in particular to investments in joint ventures, especially in offshore wind, as well as other transition-enabling activities such as CCUS and initiatives to reduce direct emissions from Upstream & Supply

and Downstream assets, including energy efficiency improvements and methane emissions reduction.

To minimise risks associated with inefficient capital allocation, including the risk of locked-in emissions, we have adopted differentiated minimum return thresholds (hurdle rates), calibrated to specific project types.

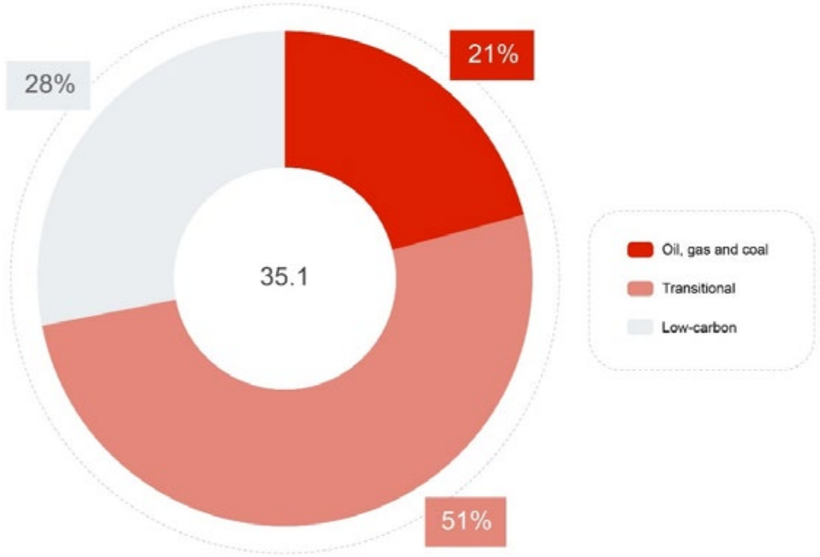
Figure 18 Minimum return thresholds




The differentiation in capital return expectations reflects the anticipated impact of each project category on the emissions profile. Investments that demonstrably support emissions reduction benefit from more favourable economic evaluation criteria, while projects with a potential to increase the Group's carbon footprint are subject to more stringent return requirements.

2025 year

Chart 37 Breakdown of 2025 capital expenditure [PLN billion/%][15]




During the reporting period, our capital expenditure on oil, gas and coal-related activities was as follows:

Table 58 Capital expenditure related to crude oil, natural gas and coal [PLN million]

| Item | ORLEN Group segment | Activity – NACE code | Maintenance | Growth and M&A |
|---|---|---|---|---|
| Crude oil | Upstream & Supply | B.05, B.06, B.09 | 274 | 1,704 |
| | Downstream | C19 | 1,666 | 1,147 |
| | | G46.71 | 559 | 165 |
| Gas | Energy | D35.1 | 663 | 887 |
| Coal | | D35.3 | 390 | - |
| **Total** | | | **3,552** | **3,903** |

[15] The chart presents all capital expenditures, including consolidated and unconsolidated, incurred by the ORLEN Group in 2025.

In 2025, we incurred PLN 7,455 million in capital expenditure related to crude oil, natural gas and coal, of which 52% was growth CAPEX and the remainder was maintenance CAPEX. Growth CAPEX was primarily allocated to refining, development of gas-fired generation capacities, and oil production.

For upstream, it was assumed, in line with NACE codes, that upstream activities comprise the production of crude oil. CAPEX related to oil production and auxiliary services was allocated proportionally based on the share of crude oil production in total oil and gas production in 2025 (26%). The remaining crude oil-related CAPEX relates to refining and wholesale of crude oil and petroleum products. Natural gas-related CAPEX reflects investments in gas-fired power generation, notably the construction and expansion of CCGT units. Coal-related CAPEX comprises maintenance expenditure on heat generation assets, allocated proportionally based on the share of coal in the consolidated companies' total district heating output in 2025, which was 59%.

In 2025, we also incurred significant capital expenditure on low-carbon activities supporting the delivery of our strategic objectives and the ORLEN Transition Plan. This expenditure included in particular spending listed in the table below.

Table 59 Capital expenditure related to the development of low-carbon activities [PLN million]

| Activities | | Maintenance | Growth and M&A |
|---|---|---|---|
| CCUS | Upstream & Supply | - | 1 |
| Biofuels and biogas | Downstream | 23 | 696 |
| Renewable and low-carbon hydrogen | | 0 | 125 |
| Chemical and mechanical recycling | | - | 16 |
| Energy efficiency improvements | | - | 45 |
| Renewable power generation | Energy | 246 | 4,454 |
| Transformation of heat generation assets | | 267 | 454 |
| Electricity distribution | | 165 | 3,075 |
| E-mobility | Consumers & Products | 1 | 116 |
| **Total** | | **702** | **8,982** |

In 2025, we allocated PLN 9,683 million to low-carbon activities, with 93% of this amount spent on growth projects. The largest share of this expenditure was allocated to the expansion of renewable energy generation assets, including projects carried out through joint ventures (such as Baltic Power), as well as electricity distribution.

Of the total 2025 CAPEX on low-carbon activities supporting the delivery of our strategic objectives and the ORLEN Transition Plan, PLN 3,446 million was related to Taxonomy-aligned activities.

Transitional CAPEX included significant investment in the development of gas-fired generation: PLN 1,066 million in total, including PLN 1,044 million for growth projects. While these activities are an important part of our transition plan, under the classification adopted in the ORLEN Transition Plan they are not classified as low-carbon and are included in capital expenditure related to crude oil, natural gas and coal.

Other transitional CAPEX mainly relates to the development of petrochemical production, oil and gas production, trading and distribution of natural gas and the development of retail services.

## Qualitative analysis of carbon lock-in

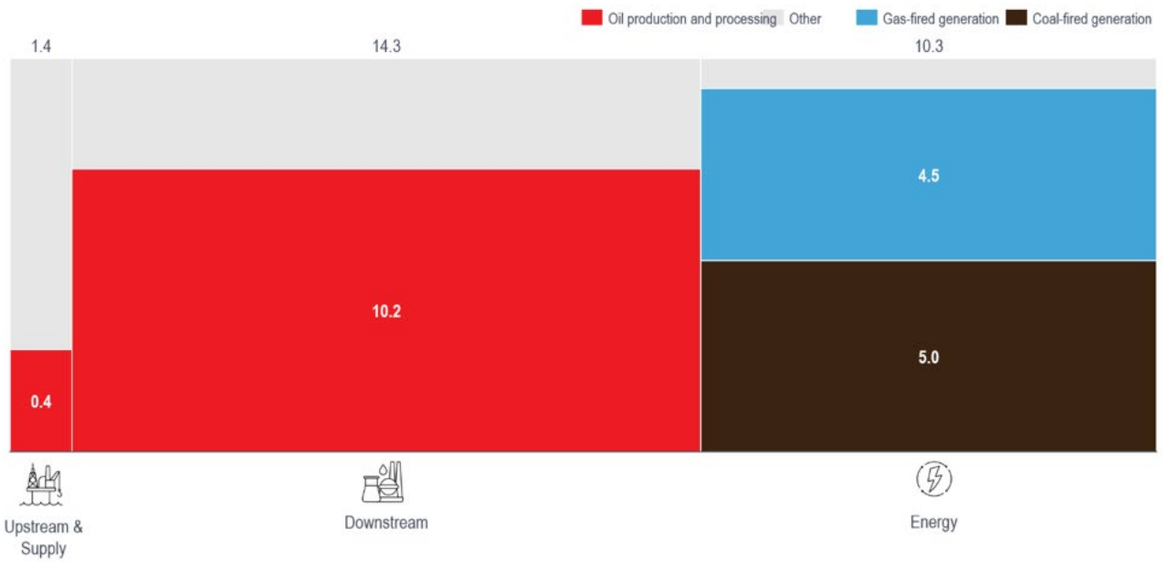
Estimates of potential carbon lock-in associated with our key assets and products are based on projections of future greenhouse gas emissions. Over the long term, petroleum products and natural gas may face declining demand, which may affect the value of assets involved in their extraction, processing and sale, and in extreme cases lead to early asset retirement and carbon lock-in.

We identify carbon lock-in risk as material in our transition risk analysis and climate strategy resilience assessment. This risk is addressed as part of our asset portfolio management, including the assessment of assets related to the production, processing and sale of crude oil and natural gas. The analysis covers both Scope 1 and Scope 2 emissions from assets operated by the Group, and Scope 3 emissions from the use of sold products. Carbon lock-in risk is systematically integrated into our strategic planning and investment decision-making.

Scope 1, Scope 2 and Scope 3 emissions are subject to a reduction pathway aligned with our decarbonisation targets, as set out in the ORLEN Transition Plan, and climate mitigation targets reported in disclosure ESRS E1-4. The pathway includes decarbonisation actions across all business segments that are considered material to emissions intensity of our operations: Upstream & Supply, Downstream and Energy.

As part of the carbon lock-in analysis, for Scope 1 we identified the highest-risk areas of our operations, in line with the CSRD framework and the provisions applicable to activities related to crude oil production and refining, as well as the use of gas and coal in electricity generation.

Chart 38 Key areas the ORLEN Group's operations in terms of Scope 1 emissions; emissions from the highest-risk areas [million tonnes of $CO_2e$]




## Upstream & Supply

The segment's key activities are the development of the ORLEN Group's own natural gas production and securing natural gas supplies to Poland. We seek to expand gas production to support the region's energy transition and enhance energy security, and at the same time respond to increasing demand driven by the phase-out of more carbon-intensive fuels, in particular coal.

The development of liquid hydrocarbon production, primarily crude oil, which accounted for 26% of our total production in 2025, is not currently a strategic priority and is responsible for a relatively small share of our direct emissions.

Accordingly, in the Upstream & Supply segment we do not identify a material risk of carbon lock-in by 2035, given our strong operational focus on minimising emissions of greenhouse gases, particularly methane, through measures aimed at reducing the emissions intensity of our assets and through disciplined investment portfolio management.

Looking ahead to 2050, emissions from upstream activities will largely depend on future demand for hydrocarbons, particularly natural gas. This will determine our exposure to carbon lock-in risk associated with the long-term use of upstream assets under accelerated energy transition scenarios.

## Downstream

Our Downstream segment comprises refining, petrochemical and fertiliser production activities. A significant proportion of emissions in this segment is produced by integrated refining and petrochemical assets.

Looking ahead to 2035, based on projected transport fuel demand in the region, the stable utilisation of our refining capacities, and the measures we undertake to bring down emissions from the Downstream operations, we do not identify a material carbon lock-in risk in this segment, despite the high share of direct emissions associated with refining activities. In line with our strategy, emissions from this segment will be reduced through decarbonisation measures, in particular energy efficiency improvements, electrification, the use of low-carbon energy, and the deployment of carbon capture, utilisation and storage (CCUS) technology.

Over the longer term, to 2050, the level of emissions from conventional refining processes will largely depend on future demand for petroleum-based fuels. At the same time, emissions from our petrochemical and fertiliser production activities may be reduced through the implementation of decarbonisation technologies appropriate for hard-to-abate sectors, including CCUS solutions, process electrification, and the use of zero-carbon hydrogen and its derivatives. Furthermore, crude oil processing is expected to shift towards petrochemical outputs, with a corresponding downscaling of conventional transport fuel production.

At the same time, we support the transformation of the Downstream segment through investments in sustainable transport and petrochemicals aimed at increasing feedstock flexibility. This is intended to reduce our long-term reliance on crude oil as the primary feedstock for transport fuel and petrochemical production and to replace crude oil with alternative feedstocks, including those of biological origin and waste-based feedstocks.

## Energy

Emissions produced by our Energy segment are associated with heat generation and utility-scale power generation activities. These activities rely on the use of fossil fuels, i.e. coal and natural gas, to generate electricity and heat.

In the Energy segment, we manage carbon lock-in risk by phasing out high-carbon coal assets and developing flexible generation capacity to support the energy transition. The phase-out of coal from power generation by 2030 and the complete elimination of its use in our operations by 2035 significantly reduce the risk of long-term reliance on high-carbon assets.

At the same time, the development of high-efficiency combined-cycle gas turbine (CCGT) units in the short and medium term serves as a transitional solution, enabling the shift away from coal while maintaining security and stability of the power and heat systems. The flexibility of CCGT technology and its role in providing back-up capacity for rapidly expanding renewable energy sources limit carbon lock-in risk in the medium term.

Over the longer term, after 2035, we expect to reduce emissions intensity of our gas-fired assets by adapting them for use with alternative fuels and low- and zero-carbon energy carriers, such as biomethane and hydrogen. This will enhance the resilience of our generation portfolio to long-term transition scenarios and further reduce carbon lock-in risk in the Energy segment.

Scope 3 Category 11 emissions

Chart 39 Scope 3 Category 11 emissions from the combustion of petroleum products in 2025 [million tonnes of $CO_2e$]




With regard to emissions generated during the use of our products, our approach to emissions reduction, as measured by the Net Carbon Intensity metric, covers greenhouse gas emissions across Scopes 1, 2 and 3, including in particular emissions associated with the use of sold products, i.e. Scope 3 Category 11 emissions. These emissions represent the dominant share of our total emissions profile and are of key importance to achieving our long-term decarbonisation targets.

Reductions in Scope 3 Category 11 emissions are supported primarily through gradual changes in our energy and product mix, including the development of alternative fuels, low- and zero-carbon fuels, as well as increasing the share of renewable and low-carbon energy in our portfolio of products and services. These measures are intended to bring down lifetime emissions of sold products and reduce the risk of locking in high emission levels.

By 2035, taking into account the measures we undertake to maintain current production and sales volumes of liquid hydrocarbons and petroleum-based fuels in line with demand, while transforming our product portfolio towards lower-carbon energy products, we do not identify a material risk of carbon lock-in associated with the use of sold products.

At the same time, in the long term, the pace and scale of Scope 3 Category 11 emissions reductions will remain highly dependent on our ability to flexibly adapt our product portfolio to the evolving market demand, consumer behaviours and regulatory frameworks. These factors influence the pace of market uptake of low- and zero-carbon solutions and, consequently, the potential to further reduce emissions associated with the use of sold products over the medium to long term.

## Material impacts, risks and opportunities and their interaction with strategy and business model [E1.SBM-3]

The ORLEN 2035 Strategy and the related ORLEN Transition Plan have been developed in response to the key challenges of the energy transition, including regulatory pressures, shifts in demand patterns, and the need to reduce greenhouse gas emissions across the value chain. Together, these documents define our development priorities and capital allocation directions, enabling us to gradually strengthen the resilience of our business model while maintaining energy security and competitive edge in a changing market environment.

## Scenario analysis

To strengthen our organisation's resilience to a changing external environment, we have embedded scenario analysis as an integral part of our medium- and long-term strategic planning. It serves as a tool supporting strategic decision-making, optimisation of the project portfolio under conditions of uncertainty, and regular updates to macroeconomic assumptions. The analysis covers three differentiated macroeconomic scenarios: a base case, an accelerated transition case and a delayed transition case, which capture alternative decarbonisation pathways, differing, among other things, in the pace of carbon price growth and the associated energy demand trajectory.

In addition, for assessing climate-related risks described in disclosure ESRS2 IRO-1, we considered a scenario aligned with the Paris Agreement, i.e. the low-emission SSP1-1.9 scenario, corresponding to a pathway which assumes keeping global temperature increase to 1.5°, and the high-emission SSP5-8.5 scenario, used for assessing physical risks.

The scenario analysis is based on sector-specific scenarios, enabling assessment of the exposure of our assets and operations to transition risks under different and realistic rates of economic decarbonisation across the region and in the countries where we operate. We use a base-case scenario reflecting current policies corresponding to publicly available reference scenarios: NECM WEM (National Energy and Climate Plan with existing measures) and IEA STEPS (Stated Policies Scenario), which serves as a reference in our strategy definition process[16] and in calculating and

[16] For details of the assumptions used in our strategic planning, see ORLEN 2035 Strategy and ORLEN Transition Plan.

recognising costs in financial reporting. Furthermore, we apply scenario analysis to assess how climate-related risks and opportunities may affect our operations, strategy, and the long-term resilience of our business model.

The analysis also takes into account elements of an accelerated energy transition, arising from regulations and instruments currently at the implementation stage, as well as the possibility of a delayed energy transition, assuming a slower pace of climate policy implementation and limited effectiveness of regulatory mechanisms.

The findings from the long-term development analyses of our key assets indicate that, in the medium-term horizon to 2035, the pace of the energy transition in Central Europe will enable the ORLEN Group to strengthen its competitive position through the execution of the ORLEN 2035 Strategy and objectives embedded in the ORLEN Transition Plan. We also used insights from the Climate Neutrality Plans[17] developed for selected assets and integrated them into the ORLEN 2035 Strategy and ORLEN Transition Plan.

For the period to 2050, uncertainty remains around the future viability of certain decarbonisation technologies, whose cost-effectiveness will depend on both their scalability and, even more critically, the availability and stability of regulatory support. Based on current long-term analyses, in the period 2036–2050, the macroeconomic environment will be characterised by a high degree of uncertainty in projected supply and demand, commodity prices, regulatory frameworks and support instruments, depending on scenario assumptions.

The analyses highlight the need for regular updates to strategic assumptions, reflecting developments in technology, regulatory incentives and investment opportunities. Decisions on the ORLEN Group's future development and the pace of our progress towards climate neutrality will depend on evolving market conditions and regulatory developments.

[17] Plans prepared in connection with Directive (EU) 2023/959 of the European Parliament and of the Council of 10 May 2023 amending Directive 2003/87/EC establishing a system for greenhouse gas emission allowance trading within the Union and Decision (EU) 2015/1814 concerning the establishment and operation of a market stability reserve for the Union greenhouse gas emission trading system.

Information on Climate Neutrality Plans is available from the Ministry of Climate and Environment at Portal Gov.pl

Table 60 Key scenarios used by ORLEN in the assessment of climate-related risks and opportunities and in strategic and financial planning

| Position | Scenario | Source | Scenario time horizon | Increase in global temperature to 2100 | Key assumptions |
|---|---|---|---|---|---|
| Assessment of transition risks and opportunities | SSP1-1.9 | IPCC AR6 | 2100 | ca. 1.5 | A global development path grounded in sustainability principles, strong international cooperation and effective climate policy. Greenhouse gas emissions decline rapidly, with global climate neutrality reached around 2050, followed by the achievement of negative emissions. |
| Macroeconomic environment evolution, strategic and investment planning | Accelerated transition | In-house analysis based on sector-specific scenarios | 2060 | ca. 1.9 | Rapid technological progress, strong international cooperation, and the early and effective implementation of ambitious climate policies. This results in accelerated decarbonisation of energy systems and industry, supported by innovation, high energy efficiency and a substantial increase in the share of renewables. Climate neutrality is achieved after 2050. |
| | Base case | | | ca. 2.5 | The development pathway is based on current policies and declared commitments, with no material tightening beyond measures already in place. Emissions decline gradually, but the pace of transition is insufficient to meet the goals of the Paris Agreement and keep global warming below 2°C. |
| | Delayed transition | | | ca. 3.2 | Delayed and uncoordinated measures to reduce emissions, combined with growing pressure to adapt to the effects of climate change rather than prevent them. Emissions remain high for much of the 21st century, and the transition is turbulent and reactive. |
| Physical risk assessment | SSP5-8.5 | IPCC AR6 | 2100 | ca. 4.4 | Rapid economic growth and high energy demand, with fossil fuels continuing to dominate the energy mix and no effective global climate policies in place. Greenhouse gas emissions rise throughout the 21st century, and climate neutrality is not achieved. The climate adaptation costs are high due to the materialisation of physical risks. |

## Description of the processes to identify and assess material climate-related risks and opportunities [E1.IRO-1]

Table 61 Double materiality assessment summary for climate change [E1.IRO-1]

| Segment | Area | Geographical region | E1<br>Risk, opportunity, impact | Impact (I)<br>Risk (R)<br>Opportunity (O) | Positive (+)<br>Negative (-) | Actual (A)<br>Potential (P) | Value chain<br>Organisation (O)<br>Downstream (D)<br>Upstream (U) |
|---|---|---|---|---|---|---|---|
| Upstream & Supply, Downstream, Energy, Consumer & Products, Corporate Functions | Refining, Upstream, Energy, Petrochemicals, Gas, Retail, Corporate Functions | Europe | **Climate change adaptation** | | | | |
| | | | Costs of measures to mitigate and adapt to climate change (weather-related events and hazards affecting business) | R | | | O |
| | | | **Climate change mitigation** | | | | |
| | | | Ensuring energy security and just transition | I | + | R, P | O, D |
| | | | Greenhouse gas emissions | I | - | R, P | O, D, U |
| | | | Development of new business segments and business lines with a portfolio of low- and zero-carbon products and services | O | | | O, D, U |
| | | | Rising costs of measures that support greenhouse gas emissions reduction, including investments in low- and zero-carbon energy sources | R | | | O, D, U |
| | | | Increased costs of non-compliance with all climate change mitigation regulations | R | | | O, D, U |
| | | Europe | **Energy** | | | | |
| | | | Energy-intensive operations | I | - | R, P | O, D, U |
| | | | Cost optimisation through reduced energy consumption and improved energy efficiency | O | | | O, D, U |

| | | short-term | medium-term | long-term |
|---|---|---|---|---|
| Climate change adaptation | R | | ✓ | ✓ |
| Climate change mitigation | O | ✓ | ✓ | ✓ |
| | R | ✓ | ✓ | ✓ |
| Energy | R | | ✓ | ✓ |
| | O | | ✓ | ✓ |

The identification and assessment of material climate-related impacts, risks and opportunities form an integral part of our strategic planning. The process includes analyses of potential risks and opportunities arising from the implementation of policies, regulations and mechanisms supporting the transition to a low- and zero-carbon economy, in line with the European Green Deal and the Paris Agreement.

## Severity

Given the energy-intensive nature of its business, the ORLEN Group has a significant impact on the climate. This impact stems both from the substantial greenhouse gas emissions generated by our own operations and from emissions arising across the value chain, as reported in disclosure E1-6.

Due to the structure of our business model, the vast majority of our emissions arise outside our direct operations and are classified as Scope 3. Accordingly, we focus not only on reducing Scope 1 and Scope 2 emissions, but also on addressing value chain emissions by reshaping our business portfolio and expanding low- and zero-carbon energy sources. These measures are intended to gradually strengthen our business model's resilience while ensuring energy security, a just transition, and our competitiveness, in line with the framework described in disclosure E1-1.

## Risks and opportunities

In our operations we identified climate-related physical risks that may affect our operational continuity, financial performance and service quality. These risks, described in detail in the section below, are addressed by our climate change adaptation activities.

The identification of transition risks and opportunities related to climate change mitigation and energy is based on a set of key indicators that assess our exposure to risks related to the energy transition, while also enabling the identification of opportunities arising from the shift to a low- and zero-carbon economy. These factors form the basis for further analysis of material impacts, risks and opportunities (IRO) and are used in decision-making processes, including the definition of strategic directions and decarbonisation actions.

The analysis of climate-related risks and opportunities was carried out in line with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), and covered the identification, classification and assessment of physical and transition risks and opportunities over the short, medium and long term.

### Climate change adaptation

In response to the identified physical risks, we implement adaptation measures to prevent and mitigate the negative impacts of extreme weather events, including prolonged droughts, heat waves, heavy precipitation and storms. These measures are particularly relevant if high-emissions climate scenarios were to materialise, especially SSP5-8.5, which assumes an average global temperature increase of around 4.4°C and entails a greater incidence of both acute and chronic weather-related events in the areas where the ORLEN Group operates and holds assets.

For major capital projects, such as Baltic Power and New Chemistry, we have carried out dedicated climate risk assessments, including physical risk analyses, covering potential materialisation of the risks under the high-emissions SSP5-8.5 scenario.

## Material climate-related physical risks

### Table 62 Material climate-related physical risks

| IRO | Risk type | Climate risk | Key impact | Affected ORLEN Group assets/segments | Adaptation/remedial actions | Time horizon |
|---|---|---|---|---|---|---|
| Implementation of climate change mitigation and adaptation measures | Acute | Extreme temperatures (heat waves, cold waves) | Operational continuity disruptions, reduced infrastructure efficiency and durability, higher failure, insurance and penalty costs | Energy and lighting infrastructure (including in the Energa Group), generation assets, distribution networks, industrial installations | Upgrading infrastructure and using temperature-resistant materials, enhancing maintenance and preventive programmes, adjusting operating parameters, monitoring temperatures and loads | Short to medium term |
| | Acute | High winds and storms | Distribution network failures, damage to power lines and support structures, prolonged outages, higher operating costs | Distribution and transmission networks (Energa Operator), energy and industrial infrastructure | Reinforcing support structures and line protection, enhancing vegetation management in power line corridors, network automation and sectionalisation, emergency response planning | Short to medium term |
| | Acute | Heavy precipitation and flooding | Flooding of facilities, operational disruption, physical damage, risk of energy and fuel supply interruptions | Generation, refining and petrochemical assets, distribution infrastructure | Upgrading drainage systems, elevation and protection of critical components, flood barriers, business continuity plans (BCP) | Short to medium term |
| | Chronic | Rising average air temperature | Shorter heating season, lower heat production and sales, changing demand profile. | Heat and power generation assets, heat sales | Diversification of the technology mix (electrification, renewables), efficiency improvements, development of flexible assets and services, business model adaptation | Medium to long term |
| | Chronic | Rising average air temperature | Reduced labour productivity, impacts on employee health | Entire ORLEN Group | Adjustments to working conditions (protective clothing, flexible working hours, access to water and shade) | Medium to long term |
| | Chronic | Hydrological drought | Limited cooling water availability, reduced generation capacity and output, lower revenue | Power plants with open-loop cooling systems, energy assets | Optimisation and modernisation of cooling systems, improved water efficiency, alternative cooling sources, operational planning | Medium to long term |
| | Chronic | Long-term climate change | Need for technological and investment adjustments, higher adaptation costs | Key assets across all segments: Upstream & Supply, Downstream, Energy | Adaptation programmes for key assets, integration of climate risks into capital expenditure planning, scenario analysis, updates to design standards | Long term |

## Climate change mitigation and energy

Given the nature of our operations, the most significant climate risks and opportunities are those related to the energy transition, that is climate change mitigation and energy. Those risks and opportunities are addressed through the ORLEN 2035 Strategy, the ORLEN Transition Plan, and our long-term ambition to achieve climate neutrality by 2050.

Our operations continue to rely to a large extent on fossil fuels and, as a result, potential carbon lock-in, as described in disclosure E1-1, may make it more difficult to meet long-term climate targets and achieve climate neutrality. This requires consistent transition efforts and the gradual decarbonisation of our asset and product portfolio. Accordingly, our strategic planning is based on an ongoing analysis of transition risks, the macroeconomic outlook, regulatory developments, technological progress and availability, and evolving consumer preferences across the short, medium and long term.

The likelihood of transition risks materialising is assessed using the low-emissions SSP1-1.9 scenario, that is a Paris Agreement-aligned pathway which assumes an accelerated energy transition, limiting the increase in average global temperature to 1.5°C. The materialisation of transition risks and opportunities is closely linked to the European Union's pursuit of climate neutrality, and affects key aspects of our business, including greenhouse gas emission costs, support mechanisms for renewable energy sources, and the evolution of regional demand for fossil fuels.

The key transition risks identified in relation to our business model are presented below, together with their impact on our strategy and assets, as well as the expected timeframe of their materialisation.

## Material transition risks related to climate change mitigation and energy

Table 63 Material transition risks related to climate change mitigation and energy

| IRO | Risk type | Transition risk | Key impact | Affected ORLEN Group assets/segments | Mitigation measures/levers | Time horizon |
|---|---|---|---|---|---|---|
| Increased costs of non-compliance with all climate change mitigation regulations | Regulatory | More stringent climate regulations (e.g. EU ETS 1, EU ETS 2, RED III) | Higher operating and compliance costs, reduced profitability of certain assets, product pricing pressure | Entire ORLEN Group | Integration of carbon costs into financial planning, internal carbon pricing, investment in low- and zero-carbon technologies | Short to medium term |
| | Regulatory | Reduction of free emission allowance allocations and EUA price volatility | Increased exposure to price risk, margin pressure | Assets covered by EU ETS (particularly Downstream and Energy) | Portfolio diversification, energy efficiency improvements, development of renewables and CCUS | Short to medium term |
| Rising costs of measures that support greenhouse gas emissions reduction, including investments in low- and zero-carbon energy sources | Technological | Delays in the development and deployment of decarbonisation technologies | Risk of suboptimal investment decisions, higher capital expenditure, delayed emissions reductions | All segments (particularly Energy and Downstream) | Scenario analysis, phased investment approach, technology partnerships | Medium to long term |
| | Technological | Limited availability of key technologies and inputs (CCUS, hydrogen, SMR) | Project delays, cost increases | Energy, Downstream, Upstream & Supply | Supplier diversification, development of in-house capabilities, pilot projects | Medium to long term |
| | Market | Declining demand for conventional fuels | Lower revenue, risk of carbon lock-in, including stranded assets | Downstream, Upstream & Supply, Consumers & Products | Shift in product mix, development of alternative fuels and low-carbon energy | Medium to long term |
| | Market | Increasing competition in low- and zero-carbon products | Margin pressure, need to accelerate investment | Energy, Consumers & Products | Scaling renewable energy capacities, development of e-mobility, product innovations | Medium to long term |
| | Reputational | Risk of greenwashing or failure to meet declared climate targets | Reputational damage, reduced access to financing, stakeholder pressure | Entire ORLEN Group | Transparent ESRS reporting, linking climate targets to remuneration, KPI monitoring | Short to medium term |
| | Reputational | Stigmatisation of the oil and gas sector | Challenges in attracting capital and talent | Entire ORLEN Group | Business diversification, communication of the transition strategy, investment in new business lines | Medium to long term |

In parallel, we identify a range of opportunities related to our efforts to mitigate climate change, including opportunities that may arise from enhanced energy efficiency, expanded use of lower-carbon energy sources, newly developed product and service offerings, entry into new markets, and organisational resilience built through business diversification.

## Material opportunities related to climate change mitigation and energy

Table 64 Material opportunities related to climate change mitigation and energy

| IRO | Opportunity type | Opportunity description | Key impact on/value for the Group | Affected segments/assets | Interaction with strategy and business model | Time horizon |
|---|---|---|---|---|---|---|
| Cost optimisation through reduced energy consumption and improved energy efficiency | Operational | Improved energy efficiency, process electrification, optimisation of energy and resource use. | Sustained reduction in operating costs, reduced Scope 1 and Scope 2 emissions, enhanced asset resilience. | Upstream & Supply, Downstream, Energy | Strengthening operational resilience and mitigating EU ETS cost exposure. | Medium to long term |
| Development of new business segments and business lines with a portfolio of low- and zero-carbon products and services | Regulatory | Access to EU support instruments (NRP, Modernisation Fund, Innovation Fund, RED III mechanisms, NZIA) for low- and zero-carbon investments. | Lower cost of capital, improved transition project economics, increased investment. | Energy, Downstream, Consumers & Products | Supporting delivery of the ORLEN 2035 Strategy and the ORLEN Transition Plan, accelerating the development of renewables, hydrogen, CCUS, e-mobility and other low-carbon solutions. | Short to medium term |
| | Technological | Development and deployment of low- and zero-carbon technologies (renewables, CCUS, SMR, hydrogen, energy storage). | Increased technological competitiveness, improved operational efficiency, new competencies and revenue streams. | Entire ORLEN Group | Diversification of the technology portfolio and supporting the transition to a multi-energy business model. | Medium to long term |
| | Market | Growing demand for renewable energy, alternative fuels, carbon management services and low-carbon solutions for industry and transport. | Revenue diversification, new business lines, reduced exposure to fossil fuels. | Entire ORLEN Group | Expanding the product offering in line with the energy transition and shifting demand. | Medium to long term |
| | Financial | Preferential financing conditions (green bonds, sustainability-linked loans) for EU Taxonomy-aligned activities. | Improved access to capital, optimised funding structure, enhanced investment attractiveness of the Group. | Entire ORLEN Group | Integrating climate targets into capital allocation and investment decisions. | Short to medium term |
| | Reputational | Strengthening the ORLEN Group's position as one of the key energy suppliers in Central Europe. | Greater stakeholder trust, enhanced attractiveness for investors, partners and employees. | Entire ORLEN Group | Consistent implementation of the climate strategy, transparent ESRS reporting and delivery on decarbonisation targets. | Medium to long term |

## 6.3.2 Policies related to climate change mitigation and adaptation [E1-2]

### ORLEN Transition Plan

The ORLEN Transition Plan, adopted by the ORLEN Management Board in 2025, is a strategic document defining our approach to the energy transition on the path to achieving climate neutrality. It explains how we respond to evolving regulatory and market conditions, supporting the decarbonisation process both within our own operations and across our broader ecosystem through the implementation of key transformation projects.

The ORLEN Transition Plan outlines our strategic directions in the face of global challenges for the sector, providing a detailed overview of the following key areas:

- **Approach to energy transition:** The ORLEN Group's strategic approach to the transition and the specific nature of energy transition challenges in Central Europe.
- **Decarbonisation strategy:** Planned targets and investments aimed at reducing emissions and creating new growth areas for the ORLEN Group, including renewable energy, SMR technologies, diversification of the fuel mix, and the development of CCUS technologies.
- **Energy transition financing:** Long-term strategy for capital allocation within the Group and approach to financing the transition.
- **Just transition:** Actions undertaken by the ORLEN Group to ensure a socially just energy transition.
- **Climate governance**: The management approach to climate and transition-related challenges within the Group, as well as climate advocacy.

| Scope of application | ESRS topics | Standards |
|---|---|---|
| Entire ORLEN Group | E1. Climate<br>E5. Resource use<br>S1. Workforce | EFRAG – Implementation Guidance [draft] Transition Plan for Climate Change Mitigation<br>TPT (Transition Plan Taskforce) – TPT Oil & Gas Sector Guidance<br>IIGCC – Net Zero Standard for Oil & Gas |

### Climate policy

We have developed the ORLEN Group Climate Policy, setting out the measures we are taking on the path to climate neutrality. The document was prepared in line with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), which are intended to standardise disclosures on climate risks. The Policy, originally adopted by the Management Board in 2023, was updated and approved in 2025.

It describes our approach to managing climate-related risks and opportunities, including climate change mitigation and adaptation, and sets out the governance structure and the principles for integrating climate matters into decision-making processes, for instance through incentive targets. In addition, the document includes the Ten Climate Governance Principles, providing a framework for engaging in regulatory matters, lobbying activities and social dialogue in relation to greenhouse gas emissions abatement, support for the energy transition, and the delivery of a just transition.

| Scope of application | ESRS topics | Standards |
|---|---|---|
| Entire ORLEN Group | E1. Climate | TCFD (Task Force on Climate-related Financial Disclosures) |

### Sustainable Development Strategy

The ORLEN Group Sustainable Development Strategy for 2025–2035, described in detail in disclosure SBM-1, addresses the most significant contemporary market and regulatory challenges identified for the ORLEN Group, in particular climate change, biodiversity and environmental protection, social relations, as well as geopolitical and economic conditions. The document is based on five pillars: Climate, Environment, Employees, Communities and Governance. Within these areas, we have defined targets that directly refer to the United Nations Sustainable Development Goals, the 10 Principles of the UN Global Compact, and the European Sustainability Reporting Standards. The Strategy therefore supports a comprehensive approach to responsible business conduct and ensures consistent and transparent reporting on sustainability matters, including under the CSRD. The Strategy, originally adopted by the Management Board in 2021, was updated and approved in 2025.

Under the Climate pillar, the Sustainable Development Strategy sets out key targets and priorities for reducing greenhouse gas emissions across Scope 1, Scope 2 and Scope 3, including reductions in absolute emissions, improvements in emissions intensity, and the development of low- and zero-carbon technologies, such as renewable energy sources, energy storage, hydrogen, CCUS and e-mobility.

| Scope of application | ESRS topics | Standards |
|---|---|---|
| Entire ORLEN Group | All topics | UN Sustainable Development Goals (SDGs)<br>ESRS (European Sustainability Reporting Standards) |

### Energy Policy

We undertake climate change mitigation measures in line with the ORLEN S.A. Energy Policy, which sets out the framework for energy management and guides our initiatives to improve energy efficiency and reduce greenhouse gas emissions. The document supports the implementation of the ORLEN 2035 Strategy and the pursuit of climate neutrality through the development of low- and zero-carbon energy sources and the optimisation of energy processes.

The Energy Policy refers to our ISO 50001-compliant Energy Management System, which enables ongoing monitoring of energy consumption, assessment of energy efficiency, and the setting of targets and optimisation measures. This system constitutes the foundation of our approach to energy management and helps us identify and implement projects improving energy efficiency.

Under the Energy Policy, we commit to implementing innovative and digital solutions to increase the use of renewable energy, develop low-carbon technologies, and promote environmentally responsible attitudes. These measures contribute to reducing greenhouse gas emissions and to integrating climate considerations into operational decision-making.

| Scope of application | ESRS topics | Standards |
|---|---|---|
| ORLEN S.A. | E1. Climate<br>E2. Pollutants<br>E5. Resource use and circular economy | ISO 50001 standard |

Integrated Management System

The ORLEN S.A. Integrated Management System Policy provides an operational framework that facilitates the achievement of our objectives by integrating environmental protection, energy efficiency and climate impact mitigation into day-to-day management and operational processes.

The Policy ensures a consistent approach to managing emissions, energy consumption and environmental risks, and thus supports our decarbonisation strategy and the pursuit of climate neutrality.

Within the Integrated Management System, climate-related issues are addressed through regular monitoring of our environmental and energy performance, continuous process improvement, risk management, and ensuring compliance with applicable regulations and standards, including ISO 14001 and ISO 50001.

| Scope of application | ESRS topics | Standards |
|---|---|---|
| ORLEN S.A. | All topics | ISO 14001 and ISO 50001 standards |

The implementation of all policies listed above is the responsibility of the ORLEN S.A. Management Board.

### 6.3.3 Actions and resources in relation to climate change policies [E1-3]

Set out below are the actions we implemented through 2025 to mitigate climate change and limit its impacts, together with projections for the period to 2030 and 2035.

The scope of these disclosures covers a range of measures, encompassing both ongoing investments and planned initiatives arising from our strategies and the ORLEN Transition Plan. They span, among other things, decarbonisation projects within our own operations, as well as initiatives aimed at reducing emissions across our value chain, including Scope 3 emissions.

The delivery of these actions is supported by dedicated capital expenditures described in the ‘Energy transition financing’ section of disclosure E1-1, which are a key factor underpinning the credibility and feasibility of our decarbonisation targets.

**Reduction of methane emissions** – reducing methane emissions is one of the key decarbonisation levers for our upstream operations. The measures we implement and the commitments we make are designed to deliver effective emissions reductions while maintaining security of supply and cost efficiency commensurate with the expected environmental benefits.

We are implementing a programme to reduce methane emissions from our upstream and distribution activities, including venting and fugitive emissions. These actions are aligned with the objective of achieving Near-Zero Upstream Methane Emissions by 2030 from operations that are under the control of ORLEN Group companies acting as project operators.

We are deploying advanced technological solutions ensuring flaring efficiency of up to 99%, including infrastructure upgrades and the optimisation of cryogenic processes and methane recovery systems. In parallel, steps are being taken to bring down methane emissions from waste gas streams through innovative technological modifications that enable their effective utilisation instead of release into the atmosphere. With regard to fugitive emissions, we apply a structured and systematic approach to methane emissions management, encompassing the elimination of well venting and a Leak Detection and Repair programme. As part of these measures, we established a comprehensive inventory of methane emission sources, and in 2025 we launched regular leak detection and repair campaigns using advanced detection technologies. Data on the results of measurements and remedial actions are consolidated in a dedicated IT system that supports methane emissions management, helping to sustain the reductions achieved and reinforcing the credibility of our decarbonisation efforts.

| Activities | Emissions scope | Related targets | Implementation status | Reductions achieved | Time horizon | Expected outcome |
|---|---|---|---|---|---|---|
| Reduction of methane emissions | Scope 1 | Oil & Gas NCI | Ongoing | ca. 0.1 million tonnes of $CO_2e$ | 2030 | ca. 0.3 million tonnes of $CO_2e$<br>Near-Zero Upstream Methane Emissions from operations where ORLEN Group companies act as project operators |

**Elimination of routine flaring.** In upstream operations ORLEN eliminates routine methane flaring by capturing the methane and using it for energy purposes, including power and heat generation. These actions support our objective of Zero Routine Flaring in upstream operations where ORLEN Group companies hold operatorship by 2030.

In addition, we are taking steps to further eliminate routine flaring, which was historically used where low-quality gas or gas available in limited volumes could not be utilised in an economically viable manner. As part of these measures, waste gas is treated, compressed and transported in order to be placed on the market, used locally for energy purposes or re-injected into the reservoir.

| Activities | Emissions scope | Related targets | Implementation status | Time horizon | Expected outcome |
|---|---|---|---|---|---|
| Elimination of routine flaring | Scope 1 | Oil & Gas NCI | Ongoing | 2030 | ca. 0.05 million tonnes of $CO_2e$<br>Elimination of emissions from routine flaring in upstream operations where ORLEN Group companies act as project operators |

**Energy efficiency.** We pursue energy efficiency improvements as a key lever for reducing greenhouse gas emissions within our own operations. These initiatives, focused on the steady optimisation of technological processes, upgrades of industrial assets and mitigation of energy losses, primarily within the Downstream segment, contribute to reduced consumption of energy utilities and, consequently, to lower Scope 1 and Scope 2 emissions.

As part of these efforts, we deploy solutions such as heat recovery, process electrification, upgrades of energy-intensive equipment, and optimisation of the operating parameters of our units. These measures are implemented both in our existing assets and at the design stage of new projects, enabling a sustained reduction in the energy intensity of our operations while enhancing their competitiveness.

The delivery of energy efficiency initiatives is supported by targeted capital and operating expenditures, alongside a structured approach to energy management, including monitoring of energy consumption and identification of further optimisation opportunities.

| Activities | Emissions scope | Related targets | Implementation status | Reductions achieved | Time horizon | Expected outcome |
|---|---|---|---|---|---|---|
| Energy efficiency improvements | Scope 1 | Oil & Gas NCI | Ongoing | ca. 0.5 million tonnes of $CO_2e$ | 2035 | ca. -1.3 million tonnes of $CO_2e$ achieved by optimising energy consumption |

**Coal phase-out and transformation of heat generation assets.** Emissions from our own operations are being reduced through such measures as the decommissioning of carbon-intensive generation capacities, replacing them with low-carbon sources, and increasing the share of renewable and low-carbon energy, including power and heat.

A key component of these actions is the phase-out of coal from our operations, which involves the discontinuation of coal use at the Ostrołęka B power plant and the gradual transition away from coal in heat generation. As a result, we will phase out coal from power generation by the end of 2030 and from heat generation by 2035.

These actions are implemented in a phased and coordinated manner, aligned with the development of low- and zero-carbon capacities, enabling a reduction of the emissions intensity of our operations while ensuring energy security and continuity of supply. The coal phase-out is a key lever for the ORLEN Group's decarbonisation, which supports our long-term energy transition. The process is carried out with due consideration of technical and social factors, including the role of heating assets within local energy systems.

| Activities | Emissions scope | Related targets | Implementation status | Reductions achieved | Time horizon | Expected outcome |
|---|---|---|---|---|---|---|
| Coal phase-out from power generation | Scope 1 | Power & Heat NCI | Planned | - | 2030 | ca. -1.6 million tonnes of $CO_2e$<br>Reduction of emissions from coal-based electricity generation |
| Transformation of heat generation assets, including coal phase-out | Scope 1 | Power & Heat NCI | Ongoing | ca. 0.6 million tonnes of $CO_2e$ | 2035 | ca -3.4 million tonnes of $CO_2e$<br>Reduction of emissions from coal-based cogeneration |

**Carbon capture and storage.** We are building a comprehensive carbon capture, utilisation, transport and storage (CCUS) value chain as one of the key levers for decarbonising our own operations and supporting the transition of hard-to-abate sectors. In this process, we take into account both the maturity of available technologies and the applicable national and regional regulatory frameworks.

CCUS is expected to help reduce $CO_2$ emissions from our industrial installations, particularly in the Downstream segment, while also establishing a foundation for providing carbon management services to third parties through the development of storage capacity of 4.26 M $CO_2$ per year, in line with the target set under the Net Zero Industry Act.

In the area of carbon capture and utilisation, we are advancing technologies that reduce direct emissions from our own installations and enable part of the captured $CO_2$ to be utilised, for instance

in the production of synthetic fuels. In parallel, we are building capabilities across the $CO_2$ management value chain, covering capture, transport and preparation for storage, creating a platform for a gradual expansion of our CCUS activities beyond our own assets and supporting industrial decarbonisation across the region.

Captured carbon dioxide will ultimately be stored in secure geological formations, which means a permanent reduction in atmospheric emissions. Access to our own sequestration sites, consistent with the Net Zero Industry Act, will allow us both to store $CO_2$ captured at our own facilities and to offer carbon management services to third parties.

| Activities | Emissions scope | Related targets | Implementation status | Time horizon | Expected outcome |
|---|---|---|---|---|---|
| Carbon capture | Scope 1 | Oil & Gas<br>NCI | Planned | 2035 | ca. -1.1 million tonnes of $CO_2e$ |
| Carbon storage, including as part of carbon management services | Value chain | NCI | Planned | 2035 | Annual storage capacity of ca. 4.26 million tonnes of $CO_2e$ (total for the ORLEN Group and third parties) |

**Renewable and low-carbon hydrogen and its derivatives.** We are developing capabilities for the production and use of renewable and low-carbon hydrogen and its derivatives as a key energy carrier supporting the decarbonisation of our own operations and the production of low-carbon transport fuels. These efforts mainly involve the gradual substitution of conventional hydrogen used in industrial processes with renewable and low-carbon hydrogen. We are investing in various feedstock sourcing options and conversion technologies, including the production of RFNBO and low-carbon hydrogen, to achieve optimal decarbonisation outcomes while minimising regulatory compliance costs.

The development of hydrogen applications is closely linked to investments in new hydrogen production capacities, including electrolysis units powered by renewable energy, as well as in storage and distribution infrastructure. Hydrogen is used primarily in our refining processes and fertiliser production, where it is a significant source of process-related emissions.

In parallel, we are expanding the use of hydrogen in the production of synthetic fuels and as a transport fuel, thereby supporting the decarbonisation of heavy transport. We are also building a hydrogen ecosystem across the entire value chain, from the production of automotive-grade hydrogen, through the development of logistics infrastructure, to the roll-out of dedicated hydrogen refuelling stations. In this way, we contribute to emissions reduction and support sustainable development across the value chain.

| Activities | Emissions scope | Related targets | Implementation status | Time horizon | Expected outcome |
|---|---|---|---|---|---|
| Production and use of renewable and low-carbon hydrogen and its derivatives | Scope 1 | Oil & Gas<br>NCI | Planned | 2035 | Ca. -1 million tonnes of CO2e<br>Reduction of direct emissions through technological changes in the production of hydrogen and its derivatives |

**Sustainable transport.** We support decarbonisation of the transport sector by diversifying our fuel mix and taking steps to increase the share of low- and zero-carbon energy carriers to 21.1% by 2030 and 26.1% by 2035.

As part of these efforts, we are developing operations in the areas of biofuels, biomethane, synthetic fuels, hydrogen and electricity, enabling the reduction of greenhouse gas emissions both in road transport and in hard-to-electrify sectors such as heavy transport, aviation and maritime transport. A case in point is the construction of an HVO facility in Płock with an annual capacity of 300,000 tonnes, producing biocomponents for diesel oil and aviation fuel. Additionally, we plan to launch Poland's first next-generation bioethanol unit with an annual capacity of 25,000 tonnes. These solutions facilitate the gradual reduction of Scope 3 emissions while leveraging existing fuel infrastructure.

An essential part of our efforts is the development of infrastructure for the distribution of alternative fuels, in particular e-mobility, through continuing expansion of the network of ultra-fast electric vehicle charging points in Poland and international markets.

These actions are aligned with EU regulations, including the RED II and RED III Directives, and drive energy transition of the transport sector in Central Europe. The implementation of transport decarbonisation measures is supported by capital and operating expenditures, as well as the development of appropriate infrastructure, including the production of low-carbon fuels, logistics, and charging and refuelling infrastructure.

| Activities | Emissions scope | Related targets | Implementation status | Time horizon | Expected outcome |
|---|---|---|---|---|---|
| Sustainable transport | Value chain | NCI | Ongoing | 2030 | 21.1% share of renewable energy in ORLEN transport fuel mix |
| | | | | 2035 | 26.1% share of renewable energy in ORLEN transport fuel mix |

**Gas-fired power generation.** We are advancing gas-fired power generation as a strategic pillar of our energy transition, preserving the stability of the national power system and contributing to emissions intensity improvements in energy generation. High-efficiency combined cycle gas turbine (CCGT) units serve as transitional assets, enabling the phased replacement of the most carbon-intensive coal-fired capacities, while ensuring security of supply and strengthening system flexibility in response to the growing penetration of renewable energy sources.

As part of this transition, we are building a portfolio of modern gas-fired assets, including CCGT units in Grudziądz, Ostrołęka, Warsaw and Gdańsk, with the aim of reaching a total installed capacity of 4.3 GW by 2030. These projects enhance the availability of low-carbon dispatchable capacity, supporting the effective balancing of the power system and reducing reliance on high-carbon coal-based generation. Our efforts to develop gas-fired power generation are closely aligned with the coal phase-out process and the ongoing transformation of the heat generation assets.

Natural gas plays a pivotal role in reducing the emissions intensity of our industrial operations, particularly within the Downstream segment, where demand for process heat has traditionally been met by high-carbon sources such as coal and petroleum-derived fuels. Their replacement with natural gas translates into a significant reduction in $CO_2$ emissions in the short to medium term, while safeguarding operational reliability and continuity.

The development of gas-fired power generation is fully aligned with our long-term decarbonisation pathway, which may involve a gradual reduction of emissions from gas-fired assets through their adaptation to alternative fuels such as biomethane and hydrogen. This approach builds resilience of our generation portfolio to evolving regulatory and market conditions, and ensures that the development of gas-fired power generation remains consistent with the ORLEN Group's decarbonisation ambitions.

| Activities | Emissions scope | Related targets | Implementation status | Time horizon | Expected outcome |
|---|---|---|---|---|---|
| Embedded generation | Scope 1 | Oil & Gas NCI | Ongoing | 2030 | Ca. -0.8 million tonnes of $CO_2e$ |
| Gas-fired generation (CCGT) | Value chain | Power & Heat NCI | Ongoing | 2030 | Growth in energy generation and reduction of emissions intensity |

**Renewable energy.** The development of renewable energy sources is a cornerstone of our energy transition, driving the reduction of greenhouse gas emissions and strengthening energy security across the region. Our efforts are focused on the steady expansion of the installed capacity of our sources in Poland and abroad, including in particular offshore and onshore windfarms and solar PV assets. We target installed capacity expansion to 9 GW by 2030 and 12.8 GW by 2035.

Our flagship initiative is the Baltic Power offshore wind farm, scheduled for commissioning in 2026, complemented by the development of infrastructure for further offshore wind projects. As part of these efforts, we have constructed a dedicated installation terminal in Świnoujście, designed to serve as a strategic logistics hub for offshore wind projects and to support the efficient installation and operation of wind farms in the Baltic Sea. At the same time, we are actively preparing to unlock the potential of our licensed areas in the Baltic Sea, paving the way for the delivery of subsequent offshore projects by 2035, including Baltic East.

The development of renewable power generation enhances the availability of zero-carbon electricity, which is used both to supply the power system and to decarbonise our own operations, including through the production of zero-carbon hydrogen and the electrification of industrial processes.

| Activities | Emissions scope | Related targets | Implementation status | Time horizon | Expected outcome |
|---|---|---|---|---|---|
| Renewable energy sources (RES) | Value chain | Power & Heat NCI | Ongoing | 2035 | Growth in energy generation and reduction of emissions intensity |

**Nuclear power generation.** We intend to pursue nuclear power development based on small modular reactor (SMR) technology as a key driver of our long-term energy transition and decarbonisation of our operations. Through ORLEN Synthos Green Energy (OSGE), we plan to deploy the BWRX-300 technology – an advanced, reliable and zero-carbon source of electricity supporting decarbonisation of power generation, heat generation and industry.

The development of SMRs is expected to provide stable, zero-carbon generation capacity that will complement the growing share of renewable energy sources, thereby enhancing system flexibility and strengthening energy security. In line with our strategic roadmap, we aim to commission the first SMRs by 2035. SMR-based nuclear power generation is intended primarily to meet our internal energy demand, including in energy-intensive industrial processes, thereby contributing to a sustained reduction in emissions.

| Activities | Emissions scope | Related targets | Implementation status | Time horizon | Expected outcome |
|---|---|---|---|---|---|
| Small modular reactors (SMR) | Value chain | Power & Heat NCI | Planned | 2035 | Growth in energy generation and reduction of emissions intensity |

**Energy storage.** We plan to develop energy storage capabilities, in particular battery energy storage systems (BESS), as a key enabler of power system stability and the effective integration of a growing share of renewable energy sources.

Energy storage solutions make it possible to balance variable generation from renewable sources, enhance system flexibility and reduce the need to use high-carbon reserve capacities. They support the efficient integration of new renewable capacities into the power system, strengthening our ability to manage generation variability and deliver system services. We are developing energy storage projects both as part of our own generation asset base and in conjunction with grid infrastructure.

In line with our strategy, we target approximately 0.8 GW of installed energy storage capacity by 2030, with further expansion to around 1.6 GW by 2035. Energy storage is seen as an important element complementing our renewable energy portfolio, gas-fired generation as a transitional solution, and SMR-based nuclear power generation within the ORLEN Group's long-term decarbonisation pathway.

| Activities | Emissions scope | Related targets | Implementation status | Time horizon | Expected outcome |
|---|---|---|---|---|---|
| Energy storage | Value chain | N/A | Ongoing | 2035 | Renewable energy storage capabilities |

### 6.3.4 Targets related to climate change mitigation and adaptation [E1-4]

Under the ORLEN 2035 Strategy, we have adopted greenhouse gas emissions reduction targets for 2030 and 2035. They reflect our strategic growth priorities and planned transformation pathway, including the allocation of capital expenditure to the energy transition, and form an integral part of the ORLEN Transition Plan.

Delivery of the targets is supported by dedicated investment programmes and operational measures across our key business segments. Given the strategic importance of the energy transition, the decarbonisation targets are regularly monitored and reviewed within our corporate governance framework. Progress against the targets is reported to the management and supervisory bodies and taken into account in decision-making processes.

The ORLEN Group aims to achieve the following emission reduction targets (calculated relative to the 2019 baseline):

## Table 65 GHG emission reduction targets

| Target | Target value | Scope 1 | Scope 2 (location-based)[18] | Scope 3 Category 11 | Generated energy volumes | Offset |
|---|---|---|---|---|---|---|
| Target 1 | 2019: base year | | | | | |
| (Oil & Gas) | 17.5 million tonnes of $CO_2e$ | 16.7 million tonnes of $CO_2e$ | 0.8 million tonnes of $CO_2e$ | - | - | - |
| | 2025: -7% | | | | | |
| | 16.2 million tonnes of $CO_2e$ | 15.5 million tonnes of $CO_2e$ | 0.6 million tonnes of $CO_2e$ | - | - | - |
| 2030: -13% | 2030: -13% | | | | | |
| 2035: -25% | ca. 15 million tonnes of $CO_2e$ | ca. 15 million tonnes of $CO_2e$ | | - | - | - |
| | 2035: -25% | | | | | |
| | ca. 13 million tonnes of $CO_2e$ | ca. 13 million tonnes of $CO_2e$ | | - | - | - |

| Target | Target value | Scope 1 | Scope 2 (location-based) | Scope 3 Category 11 | Generated energy volumes | Offset |
|---|---|---|---|---|---|---|
| Target 2 | 2019: base year | | | | | |
| (Power & Heat) | 377 kg $CO_2e$/MWh | 10.6 million tonnes of $CO_2e$ | - | - | 28.2 TWh | - |
| | 2025: -18% | | | | | |
| 2030: -40% | 309 kg $CO_2e$/MWh | 9.8 million tonnes of $CO_2e$ [19] | - | - | 31.7 TWh | - |
| | 2030: -40% | | | | | |
| 2035: -55% | ca. 220 kg $CO_2e$/MWh | ca. 12 million tonnes of $CO_2e$ | - | - | ca. 56 | - |
| | 2035: -55% | | | | | |
| | ca. 170 kg $CO_2e$/MWh | ca. 10 million tonnes of $CO_2e$ | - | - | ca. 65 | - |

| Target | Target value | Scope 1 + Scope 2 (location-based) | Scope 3 Category 11 | Generated energy volumes | Offset |
|---|---|---|---|---|---|
| Target 3 | 2019: base year | | | | |
| (Net Carbon Intensity) | 78.6 g $CO_2e$/MJ | 21.5 million tonnes of $CO_2e$ | 122.3 million tonnes of $CO_2e$ | 1,856 PJ | - |
| | 2025: -2% | | | | |
| | 77.1 g $CO_2e$/MJ | 21.9 million tonnes of $CO_2e$ [20] | 116.7 million tonnes of $CO_2e$ | 1,795 PJ | - |
| 2030: -10% | 2030: -10% | | | | |
| 2035: -15% | ca. 70 g $CO_2e$/MJ | ca. 23 million tonnes of $CO_2e$ | ca. 120 million tonnes of $CO_2e$ | CA. 2,000 PJ | - |
| | 2035: -15% | | | | |
| | ca. 67 g $CO_2e$/MJ | ca. 21 million tonnes of $CO_2e$ | ca. 120 million tonnes of $CO_2e$ | ca. 2,100 PJ | ca. -3.2 million tonnes of $CO_2$ (carbon management services provided to third parties) |

[18] In 2025, Scope 2 emissions in the decarbonisation targets were measured using the location-based methodology, reflecting a change from the approach used in the 2024 report.

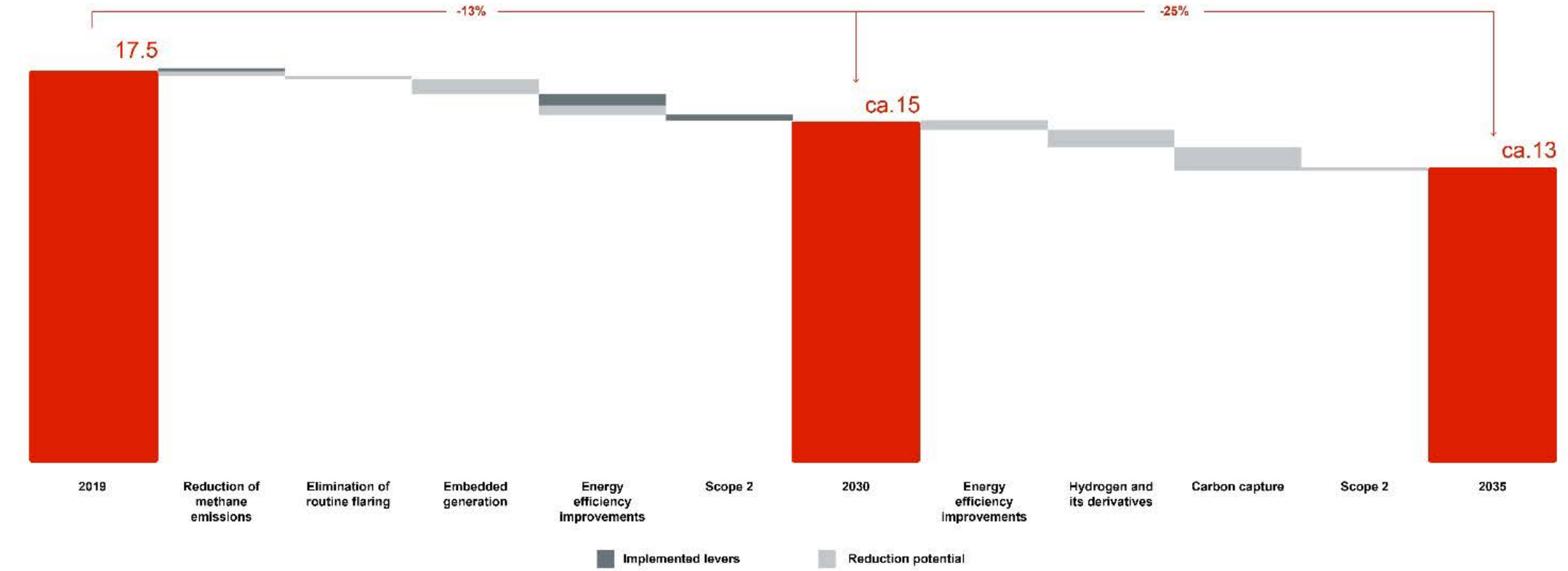
[19] In 2025, 0.3 million tonnes of $CO_2e$ was produced by Elektrociepłownia Stalowa Wola, a company accounted for with the equity method.

[20] In 2025, 0.3 million tonnes of $CO_2e$ was produced by Elektrociepłownia Stalowa Wola, a company accounted for with the equity method.

## Emissions reduction targets

### Oil & Gas – reduction of absolute Scope 1 and Scope 2 emissions [million tonnes of CO2e]

Chart 40 Reduction of Scope 1 and Scope 2 emissions from Oil & Gas operations




The Oil & Gas target covers Scope 1 and Scope 2 emissions from hydrocarbon production and oil processing operations under our operational and financial control.

We aim to reduce these emissions by 13% by 2030 and 25% by 2035 relative to the base year, when they totalled 17.5 million tonnes of $CO_2$e. In 2025, Scope 1 and Scope 2 emissions amounted to 16.2 million tonnes of $CO_2$e, representing a 7% reduction relative to the base year.

The reduction achieved between 2019 and 2025 was driven by:

- Energy efficiency projects implemented at refining and petrochemical production plants (emissions reduction by approximately 0.5 million tonnes of $CO_2$e),
- Lower emissions from upstream operations (emissions reduction by approximately 0.1 million tonnes of $CO_2$e),

- Reduction in Scope 2 emissions (by approximately 0.2 million tonnes of $CO_2e$),
- The remaining reduction was attributable mainly to production optimisation.

Key identified levers for achieving the emission reduction target in our Oil & Gas operations, i.e. the Upstream & Supply and Downstream segments, include:

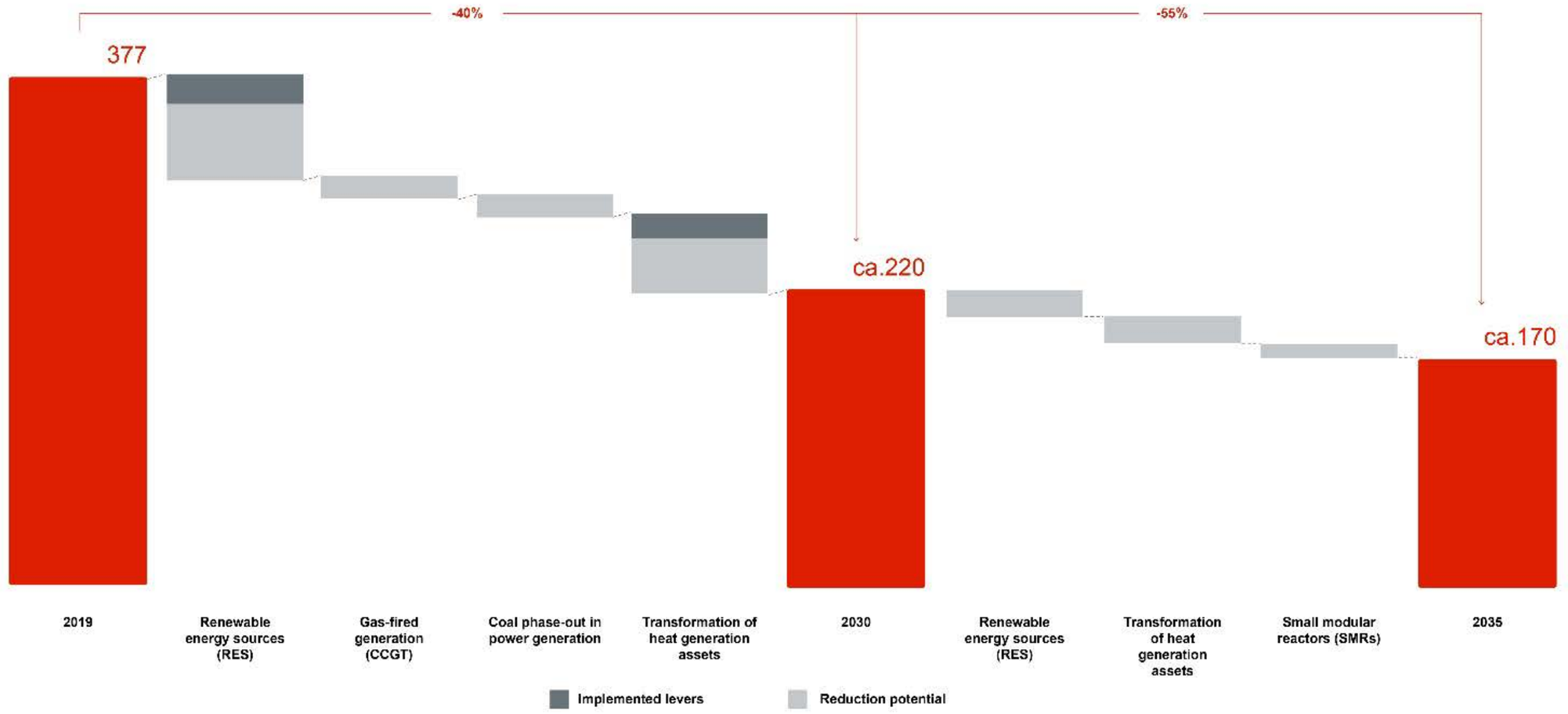
- Reduction of emissions from upstream operations, to be achieved primarily by cutting methane emissions and eliminating routine gas flaring. In this context, we have adopted two targets for 2030 – Zero Routine Flaring and Near Zero Upstream Methane Emissions – covering all upstream operations under control of ORLEN Group companies acting as the operators;
- Expansion of the use of low-carbon energy by decommissioning integrated generation assets relying on carbon-intensive energy sources and shifting generation towards lower-carbon sources;
- Implementation of energy-efficiency solutions such as heat recovery systems and electrification of production facilities;
- Production and use of renewable and low-carbon hydrogen and its derivatives as a key energy carrier supporting the decarbonisation of our own operations;
- Development of the carbon capture, utilisation and storage (CCUS) technology to reduce emissions from our refining and petrochemical plants;
- Reduction of Scope 2 emissions, i.e. indirect greenhouse gas emissions from the generation of purchased electricity and heat.

Table 66 Levers for reducing greenhouse gas emissions

| Activities | Emissions scope | Implementation status | Reductions achieved | Time horizon | Expected outcome |
|---|---|---|---|---|---|
| Reduction of methane emissions | Scope 1 | Ongoing | ca. 0.1 million tonnes of $CO_2e$ | 2030 | ca. 0.3 million tonnes of $CO_2e$ |
| Elimination of routine flaring | Scope 1 | Planned | N/A | 2030 | ca. 0.05 million tonnes of $CO_2e$ |
| Embedded generation | Scope 1 | Planned | N/A | 2030 | Ca. -0.8 million tonnes of $CO_2e$ |
| Energy efficiency improvements | Scope 1 | Ongoing | ca. 0.5 million tonnes of $CO_2e$ | 2030 and 2035 | ca. -1.3 million tonnes of $CO_2e$ |
| Production and use of renewable and low-carbon hydrogen and its derivatives | Scope 1 | Planned | N/A | 2035 | ca. -1 million tonnes of $CO_2e$ |
| Carbon capture | Scope 1 | Planned | N/A | 2035 | ca. -1.1 million tonnes of $CO_2e$ |
| Reduction of emissions from purchased energy | Scope 2 | Ongoing | 0.2 million tonnes of $CO_2e$ | 2030 and 2035 | ca. 0.3 million tonnes of $CO_2e$ |

## Power & Heat – reduction of emissions intensity in electricity and heat generation [kg CO2e/MWh]

Chart 41 Scope 1 emissions intensity reduction in energy generation [kg $CO_2$e/MWh]




The Power & Heat target covers Scope 1 greenhouse gas emissions from operations contributing to electricity and heat generation that are under the Group's operational and financial control, as well as emissions and energy generation volumes from joint ventures accounted for using the equity method. This approach ensures alignment with the objectives of the ORLEN 2035 Strategy and the ORLEN Transition Plan, under which the delivery of strategic KPIs in conventional gas-fired generation and renewable energy is supported, among other things, by the development of activities carried out through joint ventures.

We aim to reduce emissions intensity in energy generation by 40% by 2030 and 55% by 2035 relative to the 2019 base year, when it stood at 377 kg $CO_2$e/MWh.

In 2025, the metric was 309 kg CO2e/MWh, down 18% pp versus the base year. The reduction achieved between 2019 and 2025 was attributable to the growth of renewable and gas-fired energy generation, as well as lower utilisation of coal-fired power plants and CHP plants. In particular:

- Emissions from energy generation were down by approximately 0.8 million tonnes of $CO_2$e, mainly as a result of a reduced use of coal;
- Energy output increased by 3.5 TWh, primarily due to the development of renewable energy sources.

The identified decarbonisation levers for reducing emissions intensity in the Energy segment (kg $CO_2$e/MWh) include:

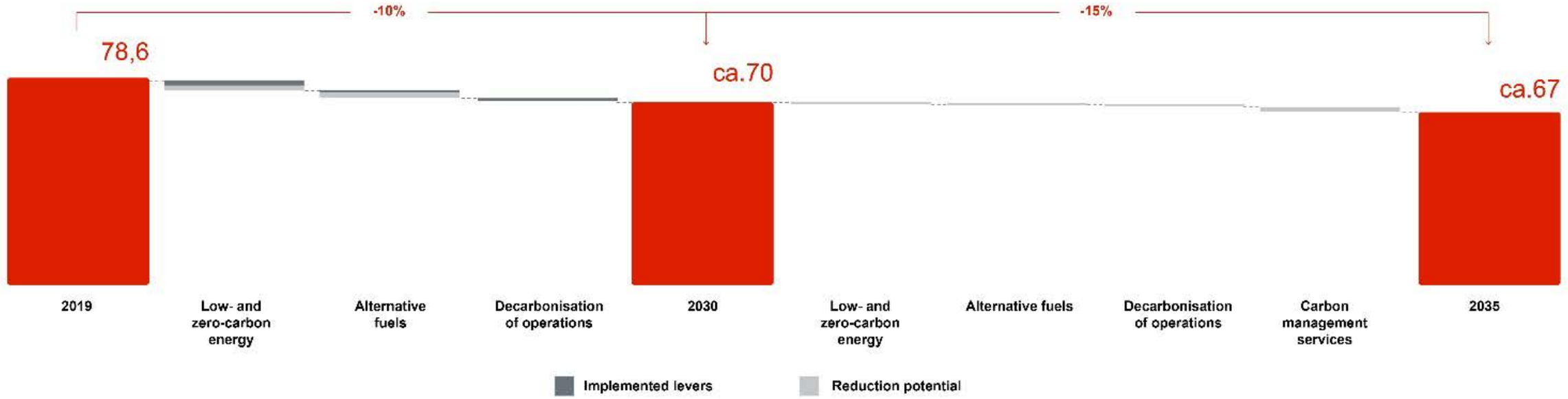
- Expansion of renewable energy sources, primarily by increasing the installed capacity in offshore and onshore wind projects and solar PV assets;
- Expansion of gas-based power generation, including the construction of highly efficient combined-cycle gas turbine (CCGT) plants to replace the most carbon intensive and least efficient coal-fired units in Poland and strengthen the stability to the national power system amid rapid development of renewable energy generation;
- Coal phase-out in power generation, that is the discontinuation of coal use for electricity generation through the decommissioning of the coal-fired Ostrołęka B power plant by 2030;
- Transformation of the heat generation segment by gradually moving away from coal in cogeneration and transitioning towards natural gas, renewable energy sources such as biomass and biogas, and increased electrification of generation processes;
- Development of small modular reactors (SMRs) – an innovative zero-carbon technology supporting the decarbonisation of power generation, heat generation and industry.

Table 67 Levers for reducing greenhouse gas emissions

| Activities | Emissions scope | Implementation status | Reductions achieved | Time horizon | Expected outcome |
|---|---|---|---|---|---|
| Renewable energy sources (RES) | Value chain | Ongoing | N/A | 2030 and 2035 | Growth in energy generation and reduction of emissions intensity |
| Gas-fired generation (CCGT) | Value chain | Planned | N/A | 2030 | Growth in energy generation and reduction of emissions intensity |
| Coal phase-out from power generation | Scope 1 | Planned | - | 2030 | Ca. -1.6 million tonnes of $CO_2$e |
| Transformation of heat generation assets, including coal phase-out | Scope 1 | Ongoing | ca. -0.6 million tonnes of $CO_2$e | 2030 and 2035 | Ca. -3.4 million tonnes of $CO_2$e |
| Small modular reactors (SMRs) | Value chain | Planned | N/A | 2035 | Growth in energy generation and reduction of emissions intensity |

## Net Carbon Intensity – reduction of Net Carbon Intensity (NCI) of the ORLEN Group's energy products [g $CO_2$e/MJ]

Chart 42 Net carbon intensity reduction – Scope 1, Scope 2, and Scope 3 Category 11 emissions [g $CO_2$e/MJ]




The Net Carbon Intensity target covers Scope 1 and Scope 2 emissions from operations related to the production of hydrocarbons and fuels and generation of electricity and heat, as well as Scope 3 Category 11 emissions from the use of our energy products and volumes of energy generated by the ORLEN Group.

We aim to reduce the NCI by 10% by 2030 and 15% by 2035 relative to the 2019 base year, when it stood at 78.6 g $CO_2$e/MJ.

In 2025, the metric was 77.2 g $CO_2$e/MJ, down 2% from the base year. resulting from increased generation of power and heat from low- and zero-carbon sources, as well as the reduction of Scope 1, Scope 2 and Scope 3 emissions.

Identified levers enabling achievement of the Net Carbon Intensity (g $CO_2$e/MJ) target:

- Increased production of low- and zero-carbon energy, driven by investments in the Energy segment and ramp-up of our own natural gas production;
- Development of the production of alternative fuels, including biofuels, synthetic fuels, and automotive-grade hydrogen, capable of effectively replacing conventional petroleum-derived fuels in the transport sector;
- Decarbonisation and optimisation of our own operations, through measures such as energy efficiency improvements, methane emission reductions, capture and storage (CCS) of carbon from our installations, switching to lower-carbon energy sources, and the phase-out of coal in power and heat generation;

- Development of carbon management services, supporting the capture and storage of emissions generated by third parties. The capture and storage of these third-party emissions constitutes a technological offset, making it possible to reduce $CO_2$ emissions beyond our own operations.

Table 68 Levers for reducing greenhouse gas emissions

| Activities | Emissions scope | Implementation status | Reductions achieved | Time horizon | Expected outcome |
|---|---|---|---|---|---|
| Development of low- and zero-carbon energy generation | Value chain | Ongoing | N/A | 2030 and 2035 | Growth in energy generation and reduction of emissions intensity |
| Development of alternative fuel production | Value chain | Ongoing | N/A | 2030 and 2035 | Growth in energy generation and reduction of emissions intensity |
| Decarbonisation and optimisation of own operations | Scope 1 and Scope 2 | Ongoing | -1.6 million tonnes of $CO_2e$ | 2030 and 2035 | Ca. -3 million tonnes of $CO_2e$ (reduction of Scope 1 and Scope 2 emissions covered by NCI) |
| Carbon management services | Value chain | Planned | N/A | 2035 | Ca. -3.2 million tonnes of $CO_2e$ (capture and storage of emissions generated by third parties) |

## NCI calculation methodology

We have developed a dedicated Net Carbon Intensity (NCI) calculation methodology to measure carbon intensity per unit of energy generated. The largest source of emissions in our value chain is the use of sold products, which is accounted for under Scope 3, Category 11.

Our NCI methodology focuses on key decarbonisation levers deployed within our own operations, as well as on enabling measures that facilitate the energy transition beyond our own operations by reshaping the energy mix and supporting the decarbonisation of industrial sectors.

We adopted a production-based approach, which mitigates the risk of double-counting while capturing all relevant areas and material emissions where future development is expected to most significantly contribute to reducing carbon intensity.

### Scopes 1 and 2 (g $CO_2e$)

The NCI metric includes direct emissions (Scope 1) – from process-related, technological, and fugitive sources, as well as indirect emissions (Scope 2) produced in the generation of electricity purchased and used in our own operations. Such emissions occur in upstream operations, crude oil refining, and the generation of power and heat from carbon-intensive sources.

The calculations include all emissions from the processes that enable the ORLEN Group to produce energy in the form of liquid fuels, natural gas, electricity and heat, both in operations under operational and financial control of ORLEN Group companies and in companies accounted for with the equity method (joint ventures), but do not include emissions from the production of petrochemicals and fertilisers, as these products do not contribute to energy generation.

### Scope 3, Category 11 (g $CO_2e$)

NCI also includes the Group's most material value chain emissions, specifically Scope 3 Category 11 emissions arising from the use-phase of sold products.

Under the production-based approach, the calculations include emissions from the use of natural gas produced in our own operations, and emissions from end-use combustion of fuels produced by all Group refineries.

Our development plans for expanding the natural gas production and increasing output of conventional fuels directly affect the volumes of Scope 3 Category 11 emissions. As such, they have a material impact on the forecast trajectory of our NCI target.

### CCUS as a service (g $CO_2e$)

Our activities related to the transport and storage of carbon dioxide (CCUS) that reduce third-party greenhouse gas emissions (carbon management services), are accounted for in the calculations of Net Carbon Intensity (NCI) as a form of technological offset. These avoided emissions are recognised in the numerator of the NCI ratio.

### Energy content of our energy products (MJ)

The NCI calculation covers all energy products of the ORLEN Group, including carbon-intensive conventional fuels produced at our refineries, such as diesel oil, gasoline, aviation fuel, and marine fuel, as well as zero-carbon alternatives, including biofuels, automotive-grade hydrogen, and synthetic fuels. It also includes natural gas produced in our upstream operations in Poland, Norway, Canada, and Pakistan.

Additionally, the metric covers electricity and heat generated by the Group from conventional fuels, such as natural gas, and from renewable energy sources, including wind, solar PV, hydropower, biogas, and biomass.

The calculation includes all volumes of energy generated in operations under operational and financial control of ORLEN Group companies, as well as volumes of energy generated by equity-accounted companies (*joint ventures*).

### Base year

We adopted 2019 as the base year for our decarbonisation targets. It was selected as a reference point due to the significant external disruptions that occurred in subsequent years, most notably the COVID-19 pandemic, which caused substantial and unforeseen fluctuations in emission levels.

Additionally, in 2020, we announced our Net Zero 2050 ambition and introduced our first interim emission reduction targets.

Following the mergers with ENERGA (April 2020), LOTOS (August 2022), and PGNiG (November 2022), the 2019 base year emissions were recalculated, in line with GHG Protocol guidance, which requires recalculation in the case of significant structural changes. As a result, taking into account emissions from the acquired assets across all three scopes retroactively from 2019, the baseline amounts for emission reduction targets were substantially revised to reflect the significantly expanded emissions boundary.

Scopes 1 and 2 emissions increased primarily due to the expansion of operations in conventional power generation, heat generation and distribution, and refining. Additionally, higher volumes of conventional fuel and natural gas sales contributed to a notable rise in Scope 3 emissions, particularly within Category 11 (use of sold products).

In 2025, adjustments were made to the reported emissions for previous years, as detailed in section E1-6, which resulted in increasing the base-year emissions volume to 17.5 million tonnes of $CO_2e$ for the Oil & Gas target (16.8 as per the 2024 publication) and to 78.6 g $CO_2e$/MJ for the Net Carbon Intensity target (78 as per the 2024 publication). At the same time, as part of a revision of the reporting methodology, Scope 2 emissions for decarbonisation targets were recalculated using the location-based approach. The base-year restatement does not affect the percentage emissions reduction targets adopted for 2030 and 2035 and ensures consistency with the data disclosed in the Sustainability Statement based on the current emissions calculations.

### 6.3.5 Energy consumption and mix [E1-5]

#### Methodology for calculating energy consumption and mix

Energy consumption data cover all companies referred to in disclosure BP-1.

Data on electricity, heat and fuel consumption are obtained from measurement systems operating within production units, ERP systems, operator reports and invoices from energy suppliers. Where complete data are not available, we use estimates based on industry benchmarks and historical data. The collected primary data are converted into final energy using factors aligned with national guidelines and applicable reporting standards.

As part of the reporting process, we identify energy flows between Group companies and subsequently eliminate them in order to avoid double counting of consumption. Energy purchases are classified by supplier and origin, taking into account guarantees of origin and energy mix data published by energy suppliers. Energy generated within the Group is allocated to the appropriate categories based on the source and type of fuel. Own consumption of individual Group companies is determined based on the balance of energy purchased, generated and resold, and is subsequently consolidated at the Group level.

As part of ongoing improvements to the reporting methodology, we made adjustments to the 2024 data on generated electricity volumes and to the method used to determine consumption of energy purchased from outside the organisation for one of the trading companies. The adjustment reduced the generated energy volumes by 14,273 MWh.

In addition, following a refinement of the methodology and in the absence of reliable information confirming the origin of nuclear energy, all energy consumption from nuclear sources reported for 2024 was reclassified as energy purchased or energy from fossil sources. Adjustments were also made to the data on the consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources. The adjustments followed from a change in the methodology used in the calculations: we applied the market-based approach instead of the location-based approach, in line with the applicable sustainability reporting guidelines. Total energy consumption was revised to include a portion of fuels combusted in refining and petrochemical processes that had been omitted from the previous report, and the classification of gaseous fuel generated in crude oil processing was also changed.
Taken together, all changes made to the 2024 disclosure increased total energy consumption by 843,988 (1%).

## Table 69 Energy consumption and mix

| Energy consumption and mix | UoM | 2025 | 2024 (restated) | 2024 (as reported in the Sustainability Statement) |
|---|---|---|---|---|
| 1) Fuel consumption from coal and coal products | [MWh] | 22,642,545 | 20,753,928 | 20,753,929 |
| 2) Fuel consumption from crude oil and petroleum products | [MWh] | 32,817,358 | 31,608,840 | 24,910,951 |
| 3) Fuel consumption from natural gas | [MWh] | 26,454,503 | 27,904,682 | 33,201,724 |
| 4) Fuel consumption from other fossil sources | [MWh] | 62,948 | 0 | 0 |
| 5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources | [MWh] | 2,374,419 | 3,507,408 | 1,947,067 |
| **6) Total fossil energy consumption (calculated as the sum of lines 1 to 5)** | **[MWh]** | **84,351,773** | **83,774,858** | **80,813,670** |
| Share of fossil sources in total energy consumption | [%] | 97% | 97% | 95% |
| 7) Consumption from nuclear sources | [MWh] | 0 | 0 | 412,391 |
| Share of consumption from nuclear sources in total energy consumption | [%] | 0% | 0% | 0.5% |
| 8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) | [MWh] | 1,603,231 | 1,076,858 | 1,076,834 |
| 9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources | [MWh] | 531,879 | 572,570 | 2,273,942 |
| 10) Consumption of self-generated non-fuel renewable energy | [MWh] | 281,840 | 725,917 | 729,379 |
| **11) Total renewable energy consumption (calculated as the sum of lines 8 to 10)** | **[MWh]** | **2,416,950** | **2,375,345** | **4,080,154** |
| Share of renewable sources in total energy consumption | [%] | 3% | 3% | 4.8% |
| **Total energy consumption (calculated as the sum of lines 6 and 11)** | **[MWh]** | **86,768,723** | **86,150,203** | **85,306,215** |

## Table 70 Non-renewable and renewable energy generation

| Item | UoM | 2025 | 2024 (restated) | 2024 (as reported in the Sustainability Statement) |
|---|---|---|---|---|
| Non-renewable energy generation | [MWh] | 42,794,555 | 39,309,280 | 40,478,155 |
| Renewable energy generation | [MWh] | 3,784,564 | 2,974,631 | 2,913,435 |

| Net revenue | UoM | 2025 | 2024 (restated) | 2024 (as reported in the Sustainability Statement) |
|---|---|---|---|---|
| From activities in high climate impact sectors, used to calculate energy intensity | [PLN million] | 267,827 | 294,886 | 294,976 |
| From activities other than in high climate impact sectors | [PLN million] | 0 | 0 | 0 |
| Total net revenue (as reported in financial statements) | [PLN million] | 267,827 | 294,886 | 294,976 |

## Table 71 Energy intensity

| Item | UoM | 2025 | 2024 (restated) | 2024 (as reported in the Sustainability Statement) |
|---|---|---|---|---|
| Total energy consumption | [MWh] | 86,768,723 | 86,150,203 | 85,306,215 |
| Energy intensity (total energy consumption to net revenue) | [MWh/PLN million] | 324 | 292 | 289 |

### 6.3.6 Gross Scopes 1, 2, 3 and Total GHG emissions [E1-6]

The reporting boundary for the ORLEN Group's greenhouse gas emissions is the same as that used in the ORLEN Group's consolidated financial statements, and is described in disclosure BP-1. Compared with 2024, the organisational boundaries were adjusted in line with changes in the ORLEN Group organisation and structure. The allocation of the carbon footprint by business segment was also revised to reflect the new management structure of the ORLEN Group.

In 2025, the Scope 3 emissions data for 2024, originally reported as estimates based on 2023 data and revenue-based indicators (2023 vs 2024), were replaced with emissions calculated using actual operational data and literature-based emission factors, in accordance with the GHG Protocol. At the time of release of the 2024 Sustainability Statement, Scope 3 emissions were not compliant with the GHG Protocol due to data availability constraints. In this Sustainability Statement both the 2025 emissions and the restated 2024 data are compliant with the GHG Protocol and ESRS.

The year-on-year differences are mainly attributable to:

- a review and development of new questionnaires for collecting more comprehensive operational data from individual companies;
- disclosure of the full biogenic emissions for fuels containing biocomponents outside the scopes::
  - for Scope 1 purposes, biogenic emissions from the combustion of biogenic components in gasoline (10% bioethanol) and diesel oil (7% FAME) were calculated and reported outside Scope 1 for the Group as a whole, and biogenic emissions associated with purchased and used electricity, heat, steam and cooling were disclosed without excluding them from total Scope 1 emissions;
  - for Scope 3 purposes, biogenic emissions were excluded from Scope 3 Category 11 and presented separately;
- changes in the classification of purchased fuel depending on fuel use (own consumption: Scope 3 Category 3; resale: Scope 3 Category 1); fuels consumed by the Group, i.e. burned or used in the production process, were included in Category 3 in 2025 (in 2024 they were included in Category 1);
- allocation of transport of fuels used for own consumption to Scope 3 Category 3..

Differences between the 2024 and 2025 Scope 1 and Scope 2 carbon footprint results are mainly due to a change in the approach to collecting, processing and consolidating emissions data. In 2024, the calculations were performed using Excel spreadsheets, which involved a greater degree of manual data processing, more limited automation of quality controls, and a higher risk of inconsistencies in the way individual entities reported and aggregated data. In 2025, a new database tool was implemented, enabling more structured and consistent management of input data, automation of part of the validation process, standardisation of the calculation logic, and a more complete reflection of the reporting boundary. In effect, the results for 2025 and previous years are based on a more mature and systematic calculation process, which may have affected the reported emission amounts compared with the previous years.

For on-site wastewater treatment plants, we adopted the formulas provided in the IPCC 2019 Refinement Guidelines. Scope 3 emissions based on primary data from suppliers and value chain partners accounted for less than 0.1% of total data in 2025; the remaining calculations were based on annually updated literature-based emission factors.

The calculation process was carried out in accordance with the following methodologies:

- GHG Protocol Corporate Standard (Scope 1),
- GHG Protocol Scope 2 Guidance (Scope 2),
- GHG Protocol Scope 3 Standard (Scope 3).

Sector-specific guidance issued by the American Petroleum Institute (API), International Petroleum Industry Environmental Conservation Association (IPIECA) and International Association of Oil & Gas Producers (IOGP) was also used to reflect the specific characteristics of emissions in the oil and gas sector. Data were collected using dedicated Excel templates, and calculations were performed in a database tool that automatically retrieved the source data.

Table 72 Regulated Scope 1 greenhouse gas emissions [tonnes of $CO_2e$]

| **Scope 1 – direct $CO_2$ emissions, including:** | **2025** | **2024 (restated)** | **2024 (as reported in the Sustainability Statement)** |
|---|---|---|---|
| Regulated $CO_2$ emissions | 23,836,422.99 | 23,144,917.43 | 22,768,539 |
| *Percentage share* | *92%* | *92%* | *91%* |
| Non-regulated $CO_2$ emissions | 2,211,927.83 | 2,063,047.72 | 1,976,480 |
| *Percentage share* | *8%* | *8%* | *9%* |

| **Greenhouse gas category** | **Scope 1 [tonnes of $CO_2e$]** |
|---|---|
| $CO_2$ | 24,866,605.93 |
| $CH_4$ | 1,109,582.84 |
| $N_2O$ | 84,286.13 |

## Table 73 Scope 1 and Scope 2 GHG emissions (two reporting perspectives) [tonnes of $CO_2e$]

| Item | 2025 | | | 2024 (restated) | | | 2024 (as reported in the Sustainability Statement) | | |
|---|---|---|---|---|---|---|---|---|---|
| | Scope 1 | Scope 2 market-based | Scope 2 location-based | Scope 1 | Scope 2 market-based | Scope 2 location-based | Scope 1 | Scope 2 market-based | Scope 2 location-based |
| Consolidated group for ORLEN Group accounting purposes | 24,157,655.57 | 2,605,467.89 | 1,663,936.33 | 23,266,698.14 | 2,964,581.30 | 2,181,150.02 | N/A | N/A | N/A |
| Emissions from non-consolidated subsidiaries (not consolidated with the full method for accounting purposes) | | | | | | | | | |
| • Rafineria Gdańska (70% interest) | 1,539,316.51 | 351,520.91 | 228,292.48 | 1,561,057.77 | 342,168.74 | 236,966.71 | N/A | N/A | N/A |
| • Butadien Kralupy AS (51% interest) | 4.88 | 24,953.38 | 23,463.66 | 5.52 | 35,123.72 | 31,684.23 | N/A | N/A | N/A |
| • Hydrocarbon production projects – based on ORLEN Upstream Norway AS's interests in the projects | 351,373.86 | 52,832.42 | 2,864.67 | 380,203.73 | 61,098.58 | 6,054.57 | N/A | N/A | N/A |
| Emissions of the consolidated group for accounting purposes and emissions from non-consolidated subsidiaries (not consolidated with the full method for accounting purposes) | 26,048,350.82 | 3,034,774.60 | 1,918,557.14 | 25,207,965.16 | 3,402,972.34 | 2,455,855.53 | N/A | N/A | N/A |
| ORLEN Group + Rafineria Gdańska (70% interest) | | | | | | | 24,745,019 | 2,510,274 | 1,764,913 |

## Table 74 Scope 3 GHG emissions by category

| Scope 3 categories [tonnes of $CO_2e$] | 2025 | 2024 (restated) | 2024 (as reported in the Sustainability Statement) |
|---|---|---|---|
| 1. Purchased goods and services (upstream) | 19,733,787.52 | 21,486,068.86 | 8,819,551 |
| 2. Capital goods (upstream) | 16,134,806.33 | 14,348,510.66 | 0 |
| 3. Fuel and energy-related activities (not included in Scope 1 or Scope 2) | 11,538,033.83 | 8,644,970.50 | 4,058,523 |
| 4. Upstream transportation and distribution (upstream) | | | 447,393 |
| 5. Waste generated in operations (upstream) | | | 9,548 |
| 6. Business travel (upstream) | | | 703 |
| 7. Employee commuting (upstream) | Immaterial categories | | 0 |
| 8. Upstream leased assets (upstream) | | | 0 |
| 9. Downstream transportation (downstream) | | | 396,747 |
| 10. Processing of sold products (downstream) | 3,489,240.12 | 5,622,229.92 | 5,726,192 |
| 11. Use of sold products (downstream) | 162,290,001.70 | 159,917,239.88 | 139,095,870 |
| 12. End-of-life treatment of sold products (downstream) | | | 0 |
| 13. Downstream leased assets (downstream) | Immaterial categories | | 0 |
| 14. Franchises (downstream) | | | 0 |

| Scope 3 categories [tonnes of $CO_2e$] | 2025 | 2024 (restated) | 2024 (as reported in the Sustainability Statement) |
|---|---|---|---|
| 15. Investments (downstream) | | | 0 |
| **Total** | 213,185,869.50 | **210,019,019.82** | **158,554,527** |

## Table 75 Total GHG emissions by value chain level [tonnes of $CO_2e$]

| Value chain level in year | Total GHG emissions market-based | | | Total GHG emissions location-based | | |
|---|---|---|---|---|---|---|
| | 2025 | 2024 (restated) | 2024 (dane opublikowane w sprawozdaniu rocznym) | 2025 | 2024 (restated) | 2024 (dane opublikowane w sprawozdaniu rocznym) |
| Upstream emissions (Scope 3, Categories 1, 2, 3) | 47,406,627.68 | 44,479,550.02 | 13,335,718 | 47,406,627.68 | 44,479,550.02 | 13,335,718 |
| Own operations (Scope 1 + Scope 2) | 29,083,125.43 | 28,610,937.49 | 27,255,293 | 27,966,907.96 | 27,663,820.68 | 26,509,932 |
| Downstream emissions (Scope 3, categories 10, 11) | 165,779,241.82 | 165,539,469.80 | 145,218,809 | 165,779,241.82 | 165,539,469.80 | 145,218,809 |
| **Total GHG emissions** | 242,268,994.93 | **238,629,957.31** | **185,809,820** | 241,152,777.46 | **237,682,840.50** | **185,064,459** |

## Table 76 Emissions intensity indicators

| Metric | UoM | 2025 | 2024 (restated) | 2024 (as reported in the Sustainability Statement) |
|---|---|---|---|---|
| Net revenue as disclosed in the ORLEN Group consolidated financial statements | [PLN million] | 267,827 | 294,886 | 294,976 |
| Emissions intensity (market-based) | [tonnes of $CO_2e$/PLN million] | 904.57 | 809.23 | 629.92 |
| Emissions intensity (location based) | [tonnes of $CO_2e$/PLN million] | 900.41 | 806.02 | 627.39 |

Emissions intensity calculated as gross GHG emissions to net revenue as disclosed in the ORLEN Group consolidated financial statements.

Table 77 ORLEN Group carbon footprint by operating segment [tonnes of CO2e]

| ORLEN Group operating segments | Scope 1 | Scope 2 market-based | Scope 2 location-based | Scope 3 |
|---|---|---|---|---|
| Upstream & Supply | 1,407,019.99 | 116,348.50 | 45,883.42 | 33,222,690.49 |
| Downstream | 14,271,848.88 | 1,499,785.17 | 985,434.32 | 101,333,656.68 |
| Energy | 10,342,908.24 | 1,360,130.20 | 851,963.51 | 15,484,301.85 |
| Consumers & Products | 14,011.92 | 48,614.60 | 28,620.64 | 63,089,942.25 |
| Corporate Functions | 12,561.79 | 9,896.13 | 6,655.25 | 55,278.22 |
| **Total** | **26,048,350.82** | **3,034,774.60** | **1,918,557.14** | **213,185,869.50** |

Table 78 Biogenic $CO_2$ emissions from the combustion or biodegradation of biomass (Scope 1, Scope 2 and Scope 3) [tonnes of $CO_2$e]

| Scope 1 | Scope 2 market-based | Scope 2 location-based | Scope 3 |
|---|---|---|---|
| 826,778.94 | 17,582.19 | 17,582.19 | 3,736,579.86 |

### 6.3.7 GHG removals and GHG mitigation projects financed through carbon credits [E1-7]

During the reporting period, we did not use any GHG removal and storage projects in our own operations, within the value chain or outside the value chain. In addition, we did not identify any carbon credits outside the value chain that had been cancelled or were planned to be cancelled.

In the short and medium term, we expect to use CCU and CCS technologies as measures to reduce greenhouse gas emissions.

As we continue to develop our decarbonisation strategy, we will assess the potential use of technological offsets, including CCU and CCS, as well as nature-based offsets, particularly in the context of the long-term target of achieving climate neutrality.

Any broader use of offset instruments, including carbon credits, by 2050 will be considered only to the extent provided for and on the terms set out under European Union regulations, taking into account the conditions formally established in applicable and future legislation and regulatory guidance.

### 6.3.8 Internal carbon pricing [E1-8]]

We have mechanisms in place that support the allocation of capital towards low- and zero-carbon investments. One of the key instruments is the incorporation of the cost of $CO_2$ emissions into financial and strategic planning for activities covered by the EU ETS. As a result, the cost of emissions becomes a material factor in assessing the economic viability of new projects and influences both investment and strategic decision-making across the Group.

The carbon prices we use in strategic planning are consistent with those applied for the purpose of financial reporting, for instance to determine the useful lives of assets, perform impairment tests, and assess the economic viability of potential acquisitions in relation to assets covered by the EU ETS.

The internal carbon pricing mechanism is primarily used to assess the impact of new investments on Scope 1 emissions, particularly in areas covered by the EU ETS, which account for over 90% of the ORLEN Group's direct emissions. With this approach, we can evaluate the project's likely performance under future conditions, with tightening regulations and rising allowance prices, and select solutions aligned with our decarbonisation targets and long-term climate strategy.

For the purposes of strategic planning, we apply internally-developed assumptions regarding future $CO_2$ prices, reflecting the trajectory of the EU climate policy. They are based on three scenarios: base case, accelerated transition, and delayed transition, which differ primarily in the pace of

allowance price growth and energy consumption pathways. The assumptions are intended to reduce the impact of short-term market volatility and provide a clearer view of the long-term trend.

We assume a continued increase in EUA prices under the EU ETS in the longer term, consistent with the EU's objective of achieving climate neutrality by 2050. Under the base scenario, this implies:

- an increase in prices to approximately EUR 120/tonne of $CO_2$ by 2030;
- a further rise to over EUR 250/tonne of $CO_2$ around 2040;
- followed by growth towards approximately EUR 350/tonne of $CO_2$ by 2050.

At the same time, we are monitoring the development of the new EU ETS 2 system, which will cover part of Scope 3 emissions, particularly those related to road transport and buildings. Given the early implementation stage of ETS 2, we are currently assessing its potential impact and progressively incorporating it into our financial and strategic planning processes.

Table 79 Type of internal carbon pricing

| Type of internal carbon pricing | Emissions volume [tonnes of $CO_2$] | Emissions scope | Price (EUR/tonne of $CO_2$) in the base case scenario | | | |
|---|---|---|---|---|---|---|
| | 2025 | | 2026 | 2030 | 2040 | 2050 |
| $CO_2$ emission allowances | 23,836,422.99 | 92% of Scope 1 | ca. 86 | ca. 120 | ca. 250 | ca. 350 |

## 6.4 Pollution [ESRS E2]

Table 80 Double materiality assessment summary for pollution [E2.IRO-1]

| Segment | Area | Geographical region | E2<br>Risk, opportunity, impact | Impact (I)<br>Risk (R)<br>Opportunity (O) | Positive (+)<br>Negative (-) | Actual (A)<br>Potential (P) | Value chain<br>Organisation (O)<br>Downstream (D)<br>Upstream (U) |
|---|---|---|---|---|---|---|---|
| Upstream & Supply, Downstream, Energy, Consumers & Products | Refining, Upstream, Energy, Petrochemicals, Gas, Retail | Europe | **Pollution of air** | | | | |
| | | | Emissions of substances and particulate matter into air, excluding GHG emissions | I | - | A, P | O, D, U |
| | | | Costs of non-compliance with regulatory changes | R | | | O, D, U |
| | | | **Pollution of water** | | | | O, D, U |
| | | | Leakage or release of harmful substances into watercourses and water bodies | I | - | A | O, D, U |
| | | | Costs of implementing new solutions to reduce water pollution and to meet regulatory requirements | R | | | O, D, U |
| | | | Reduction of water consumption costs through circular use of water | O | | | O, D, U |
| | | | Risk of incurring additional costs for surface water restoration and soil remediation in the event of contamination caused by releases of harmful substances into watercourses and soil | R | | | O, D, U |
| | | | **Pollution of soil** | | | | |
| | | | Excessive remediation costs; inadequate provision for remediation measures; stricter legal requirements relating to remediation | R | | | O, D, U |
| Downstream, Consumers & Products | Refining, Petrochemicals, Retail | Europe | **Substances of concern** | | | | |
| | | | Production and use of substances of concern in production processes | I | - | A | O |
| | | | Costs of substituting substances currently used with safer alternatives | R | | | O |
| | | | Substances of very high concern | | | | |
| | | | Production and use of substances of very high concern in production processes | I | - | A | O |
| | | | Costs of substituting substances currently used with safer alternatives | R | | | O |
| | | | Improvement of product competitiveness through substituting substances currently used with safer alternatives / substances that are not considered substances of concern | O | | | O |
| Downstream | Petrochemicals | | **Microplastics** | | | | |
| | | | Potential pollution from synthetic polymer microparticles (SPM) | I | - | P | O, D, U |

| | | short-term | medium-term | long-term |
|---|---|---|---|---|
| Pollution of air | R | ✓ | ✓ | ✓ |
| Pollution of water | R | ✓ | ✓ | ✓ |
| | O | | ✓ | ✓ |
| Pollution of soil | R | ✓ | ✓ | ✓ |
| Substances of concern | R | ✓ | ✓ | ✓ |
| Substances of very high concern | R | ✓ | ✓ | ✓ |
| | O | | ✓ | ✓ |

### 6.4.1 Policies related to pollution [E2-1]

We have completed work on the development of a draft policy dedicated to the management of material impacts, risks and opportunities relating to pollution prevention and control, including air, water and soil pollution, the substitution of substances of concern and minimisation of their use, and the gradual phase-out of substances of very high concern. The policy will also address the prevention of incidents and emergency situations, as well as the effective management of their impacts on people and the environment. The policy development process was initiated in the second quarter of 2025, and the formal adoption of the document is planned for 2026.

Pending the development and implementation of a dedicated policy, pollution prevention and abatement matters are addressed in the ORLEN Group Environmental Policy, introduced by an order of the President of the ORLEN S.A. Management Board of 20 January 2025. It was developed as an internal Group-wide regulation and, prior to its adoption, was subject to broad consultation across multiple areas of our organisation. The ORLEN Group companies were also required to make sure it is effectively communicated to their employees.

The ORLEN Group Environmental Policy constitutes the overarching framework for environmental management within the ORLEN Group and comprehensively covers key aspects of our impacts on the environment. It sets out our commitments to minimising the environmental adverse impacts of our operations and defines the principles that guide our activities.

Our commitments under the ORLEN Group Environmental Protection Policy include:

- establishing environmental protection objectives for the Group's operations;
- considering environmental impacts in the process of capital project planning;
- focusing on innovation and the advancement of new technologies that may drive improvements in environmental protection;
- improving on an ongoing basis operational processes and environmental management systems; implementing sustainable practices;
- implementing planned measures to achieve the environmental protection objectives for the Group's operations and monitor progress;
- conducting environmental studies, surveys and programmes, and advancing the digitalisation of processes across the Group's operations to improve environmental impact monitoring and mitigation;
- requiring contractors to comply with specified environmental standards and supporting them in their efforts to reduce negative environmental and climate impacts;
- raising awareness and effectively implementing the principles of the ORLEN Group Environmental Protection Policy, including through educational initiatives and employee training, fostering pro-environmental attitudes and actions, and promoting the concept of sustainable development within local communities.

The Environmental Protection Policy primarily applies to our own operations and, where relevant, extends across our value chain, in particular by requiring contractors and suppliers to comply with specified environmental standards.

The Policy provides a robust foundation for further, more detailed sectoral policies, including the planned pollution prevention and abatement policy, as well as the Circular Economy Policy, which was developed and subsequently approved by the President of the ORLEN S.A. Management Board in 2025.

Pollution-related matters form a pillar of our Sustainable Development Strategy for 2025–2035, reflected in Stream 6 – Circular economy and pollution abatement. One of the objectives of this stream for 2030 is the optimisation of the ORLEN Group's emission indicators for $SO_2$, NOx, particulate matter and other pollutants.

In addition, we have environmental management systems in place at the ORLEN Group that address pollutant emissions control and abatement. The relevant documents are designed to ensure the safe conduct of operations in full compliance with applicable legal regulations. They serve as key instruments supporting responsible management, with a particular emphasis on maintaining the highest standards in occupational health and safety and environmental protection, as well as strengthening employee awareness in this area among our workforce engaged in activities that may impact the environment.

### 6.4.2 Actions and resources related to pollution [E2-2]

The ORLEN Group's operations, encompassing oil and gas production, crude oil refining, production of organic and inorganic chemicals, combustion, product packaging, as well as service activities, are associated with environmental impacts, in particular pollutant emissions. The scale and nature of these impacts vary depending on the type of each company's operations, as well as its size and geographical area of activity.

We are actively working to reduce the adverse environmental impacts of our operations and to mitigate pollution-related risks through such measures as investing in equipment and technologies that reduce pollutant emissions, implementing BAT/BREF guidelines on emission reduction techniques and measures, progressively substituting hazardous substances with biodegradable alternatives, and maintaining rigorous incident and spill response procedures.

The directions of our initiatives addressing material pollution-related issues are set out in the ORLEN Group Sustainable Development Strategy for 2025–2035 and in the ORLEN Group Environmental Protection Policy aligned with the Strategy.

The ORLEN Group companies monitor pollution levels on an annual basis through, inter alia, air emission measurements and tests of soil, water and wastewater conducted by accredited laboratories. The scope and methods of pollution monitoring are aligned with applicable legal requirements and administrative decisions held by the Group, and are carried out in accordance with reference methodologies. The results obtained form the basis for assessing ongoing processes and, where necessary, for undertaking corrective actions. We also duly perform the obligation to report annually on pollutant emissions to the relevant administrative authorities. Selected Group companies disclose this information in publicly available reports.

We have a range of environmental procedures, orders and instructions in place at the ORLEN Group that address the management and reduction of pollutant emissions, including the mitigation of negative impacts of air, water and soil pollution, the prevention of incidents and emergency situations, and the limitation of their impacts on people and the environment. These documents serve to support responsible management, with particular emphasis on maintaining the highest standards of occupational health and safety and environmental protection. They undergo reviews and updates as required. ORLEN Group companies have also established and follow internal procedures for conducting monitoring and performing measurements related to environmental protection.

The ORLEN Group companies allocate financial resources to the implementation of pollution prevention action plans, recognising them as a key element of our sustainable development strategy and efforts to maintain technological leadership. The funding required to deliver our operational and investment plans is budgeted on a case by case basis as part of operational, maintenance and investment plans.

The following resources have been allocated by ORLEN Group companies to pollution-related activities:

- financial resources: including expenditures on measurements and laboratory services, and implementation of budgeted projects related to environmental surveys, monitoring and supervision, as well as capital expenditure;
- technical resources: in particular measurement systems;
- organisational and human resources: including employees responsible for environmental protection, monitoring, reporting, supervision, inspections, plant maintenance, as well as support from external contractors (environmental surveys, advisory services).

Individual pollution-related measures are funded through both operating expenditure (OPEX) and capital expenditure (CAPEX). The capital expenditure spent on these measures in 2025 was approximately PLN 210 million, while the amount planned for 2026 is PLN 235 million.

The majority of expenditures are financed from our own resources and, to a lesser extent, through intra-group loans and external funding, including funding under the European Funds for Infrastructure, Climate and Environment Programme 2021–2027 (FEnIKS), the European Funds for a Modern Economy 2021–2027 instrument, as well as funding for projects involving process innovations in the area of gas infrastructure implemented under the Innovations for the Environment priority programme.

Our key activities are concentrated in the European Union and relate primarily to our own operations. In our operations and across the value chain, we oversee external service providers and suppliers through the ORLEN Group Supplier Code of Conduct. In addition, Group companies may use internal organisational regulations to require counterparties to remedy the effects of any damage caused directly or indirectly by emissions, leaks, discharges or any other forms of release of hazardous substances into the air, water or soil. ORLEN S.A. has also adopted Environmental Protection Rules that provide for periodic inspections of cooperating entities, including checks on their compliance with environmental protection requirements.

Our key projects currently under way or planned, including ongoing pollution-related measures, in the short-term horizon (up to one year), include:

- construction of TGTU III, a Claus tail gas treatment unit that reduces SO2 emissions from the Claus process;
- implementation and maintenance of a continuous Leak Detection and Repair (LDAR) system for monitoring and controlling the tightness of industrial installations;
- construction of a catalytic oxidation (CATOX) unit for the ethylene oxide and glycol plant TEiG II in order to reduce emissions of organic compounds;

- flue gas recirculation within the hydrogen chloride recovery installation, resulting in a reduction of air pollutant emissions;
- construction of a biomass-fired CHP plant as part of the B2G complex in Jedlicze, which will double the output of steam and electricity for the needs of the 2G bioethanol plant and existing units; the project, scheduled for completion in the first quarter of 2026, is the first step towards a complete phase-out of coal combustion at the Jedlicze site and reduction of emissions from fossil fuels;
- commissioning of a gas- and oil-fired boiler house replacing coal-fired boilers at the Kawęczyn CHP plant as part of the Investment Plan; commissioning of gas engines at the Pruszków CHP plant, expected to contribute to a reduction of air pollutant emissions;
- construction of a flue gas condensation system at the Siekierki CHP plant (pending acceptance);
- installation of new flue gas treatment systems at ORLEN Silesia's plants, which enable air pollutant emissions to be reduced to the required levels if fuel parameters deteriorate;
- elimination of routine flaring of methane from upstream operations;
- construction of a new peak-load and reserve steam generation source (the new boilers will replace the worn-out Boiler K1, which will be permanently decommissioned upon completion of the project). The project, scheduled for completion in September 2026, will enable compliance with environmental requirements, enhance the stability of the plant's energy system and ensure full reservation for the CCGT unit capacities;
- continuation of investment projects aimed at reducing pollutant emissions, including completion of the conversion of Boiler OP650 No. 3 at the Ostrołęka power plant to enable 50% biomass co-firing. In 2025, we completed further tests of 50% biomass co-firing;
- commissioning of a peak-load and reserve boiler house with a thermal capacity of approximately 50 MWt as part of the modernisation of the Kalisz CHP plant. Located across two levels, the facility comprises three gas-fired hot-water boilers: two with a capacity of around 20 MWt each and one with a capacity of 10 MWt. The new equipment has been placed within an existing, modernised part of the plant in order to reduce pollutant emissions. Commissioning of a cogeneration system comprising two gas engines with a thermal capacity of 20 MWt and electrical capacity of 20 MWe;
- construction of a cogeneration system at the Elbląg CHP plant, including engines with a total capacity of 30 MWt and 30 MWe; its high energy efficiency will significantly reduce emissions of particulate matter and gaseous pollutants;
- planned construction of a desulphurisation unit for biogas generated in the wastewater treatment process and its redirection for combustion at the CHP plant in Trzebinia in order to reduce emissions from fossil fuel combustion; the project completion is scheduled for 2026;
- planned commencement of a project to build a peak-load and reserve boiler house at the Jedlicze site in order to completely phase out the use of coal; the project is currently at a preliminary stage (pending approval for implementation), with completion scheduled for the end of 2027 or beginning of 2028;
- planned separation of spent cooling water discharged to the Żerański Canal from inflows from the Żerań CHP plant process units; a tender procedure for construction works has been scheduled for 2026 (to be completed by the end of 2026).

in the medium-term horizon (up to 5 years):

- upgrade of the sulphur recovery unit by adding a third catalytic stage to the existing two-stage Claus process, with the implementation of the selected technology expected to increase sulphur recovery efficiency in the Claus process and ensure a high level of environmental performance, reaching ≥ 98.5%; The additional third catalytic stage will enable continuous conversion of $SO_2$ into elemental sulphur and reduce $SO_2$ concentrations in combustion gases; scheduled project completion date: 31 December 2029;
- a combined cycle gas turbine (CCGT) unit; a gas-fired boiler house at the Siekierki CHP plant; heat pumps with a flue gas condensation system at the CCGT unit; a heat accumulator at the Żerań CHP plant; a gas-fired boiler house at the Kawęczyn heating plant; and a biomass-fired boiler house at the Pruszków CHP plant – planned to be commissioned by 2030;
- preparation of an action plan to expand the Konopnica biogas plant, with an electrical capacity of 1.998 MW and a thermal capacity of 2.128 MW, within the time horizon up to 2030; increased availability of alternative fuels will result in lower emissions compared to the combustion of conventional fuels;
- a multi-fuel unit at the Żerań CHP plant; heat pumps with a flue gas condensation system at the CCGT unit in the Siekierki CHP plant; installation of large-scale heat pumps at the Czajka, Południe and Pruszków wastewater treatment plants; and boiler plants with electrode boilers at the Żerań and Pruszków CHP plants – planned to be commissioned after 2030.

in the long-term horizon (over five years):

- implementation of offshore wind farm projects, which in the long-term horizon represent a systemic investment in reducing environmental pollution, help reduce emissions and other pollutants associated with fossil fuel combustion, and support the energy sector's long-term transition towards low- and zero-carbon energy sources.

Additional measures include investments in renewable energy sources, the development of alternative fuels, the implementation of environmental management systems, infrastructure upgrades and participation in research and development projects, all of which contribute to reducing our adverse environmental impacts. These measures also support decarbonisation, which indirectly contributes to the reduction of pollutant emissions.

The ORLEN Group companies monitor the effectiveness of their actions with respect to significant pollution-related impacts, risks and opportunities by undertaking control and monitoring processes prescribed by administrative decisions. These processes allow them to assess risks and determine the potential scale of pollution impacts, and to implement appropriate corrective and remedial actions if environmental deterioration or risks are identified.

Our pollution-related actions and resources described above are aligned with each level of the mitigation hierarchy: avoiding pollution, minimising pollution, and rehabilitating, restoring and transforming ecosystems where pollution has occurred.

### 6.4.3 Targets related to pollution [E2-3]

We plan to define measurable, time-bound and outcome-oriented targets within five years. Meanwhile, for the reporting year 2025 we have adopted pollution-related goals resulting from the ORLEN 2035 Strategy and the ORLEN Group Sustainable Development Strategy for 2025–2035. In line with the objectives of the ORLEN Group Sustainable Development Strategy for 2025–2035, one of the goals to be achieved by 2030 is the optimisation of our emission indicators for $SO_2$, NOx, particulate matter and other pollutants. Selected ORLEN Group companies adopted a zero-incident principle in relation to potential leakages that may give rise to pollutant emissions, as well as an objective of minimising the use of hazardous chemical substances.

Progress towards the abovementioned goals is monitored using our environmental management systems, including ISO 14001 and EMAS, through emission measurements and analysis, internal audits, periodic reviews of indicators at the level of particular sites and organisational units, and systems such as the Leak Detection and Repair system. The monitoring results are used to assess compliance with emission levels specified in integrated and sectoral permits.

### 6.4.4 Pollution of air, water and soil [E2-4]

#### Pollution of soil

We do not carry out any treatment of waste in soil, i.e. in accordance with the E-PRTR definition, releases to soil are associated with waste disposal processes in soil (D2 – Land treatment and D3 – Deep injection (e.g., injection of pumpable discards into wells, salt domes or naturally occurring repositories, etc.)). Soil pollution may occur as a result of emergency situations or incidental leakages. In 2025, no pollutant emissions to soil were recorded during the normal operation of the ORLEN Group facilities.

When potential soil pollution is identified, tests are carried out to analyse whether permissible limits have been exceeded. Measurements are performed on the basis of accredited sampling and chemical analyses of soil samples conducted by accredited laboratories. Additionally, periodic tests are performed at selected ORLEN Group facilities in accordance with decisions issued by the relevant administrative authorities for specific areas, such as province marshals. Measurement and sampling of pollutants emitted to soil (for the companies operating in Poland) are conducted in accordance with the Regulation of the Minister of the Environment of 1 September 2016 on methods for assessing soil surface contamination (Dz.U. of 2016, item 1395), as well as regulations of other countries in which ORLEN Group companies operate.

Data collection for the purposes of accounting and reporting on pollution is governed by an internal order defining the principles for financing and the methods of implementing remediation works at ORLEN S.A. facilities.

For the pollutants listed in Annex II to Regulation (EC) No 166/2006 of the European Parliament and of the Council of 18 January 2006 concerning the establishment of a European Pollutant Release and Transfer Register and amending Council Directives 91/689/EEC and 96/61/EC (the “E-PRTR Regulation”), the volumes of air emissions related to the ORLEN Group’s operations in 2024–2025 that exceeded the thresholds set out in the E-PRTR Regulation are presented in Table 76. In addition, Table 77 presents consolidated emissions data for ORLEN Group companies broken down by business segment.

The tables do not include the six greenhouse gases reported under ESRS E1 *Climate Change*, namely carbon dioxide ($CO_2$), methane ($CH_4$), nitrous oxide ($N_2O$), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride ($SF_6$) and nitrogen trifluoride ($NF_3$).

The 2024 emissions volumes were determined on the basis of emission factors and, in the 2025 reporting year, were restated to reflect actual data.

## Pollution of air

For the pollutants listed in Annex II to Regulation (EC) No 166/2006 of the European Parliament and of the Council of 18 January 2006 concerning the establishment of a European Pollutant Release and Transfer Register and amending Council Directives 91/689/EEC and 96/61/EC (the "E-PRTR Regulation"), emissions from our installations in 2024–2025 that exceeded the thresholds set out in the E-PRTR Regulation are presented in Table 81. In addition, Table 82 presents consolidated data on emissions from the ORLEN Group companies' installations broken down by business segment, which also take into account the thresholds set out in the E-PRTR Regulation.

The 2024 emissions originally reported in the 2024 Sustainability Statement were determined on the basis of emission factors. In the 2025 reporting year, they were restated to reflect actual data. The initial use of estimates was due to the lack of a complete set of measurement data at the time the 2024 Sustainability Statement was published. The originally published 2024 emissions of non-methane volatile organic compounds (NMVOC) were overstated relative to the actual figures not only because they had been calculated using emission factors, but also because the unit of measure was incorrectly assigned to data from one of the companies.

### Table 81 Quantity of pollutants emitted to air [tonnes]

| Pollutant | Threshold values for emissions to air [tonne/year] | 2025 | 2024 (restated) | 2024 (as reported in the Sustainability Statement) |
|---|---|---|---|---|
| Sulphur oxides (SOx/$SO_2$) | 150 | 21,601.21 | 24,429.71 | 18,170.17 |
| Nitrogen oxides (NOx/$NO_2$) | 100 | 14,033.79 | 13,824.24 | 12,466.35 |
| Non-methane volatile organic compounds (NMVOC) | 100 | 6,441.81 | 6,489.82 | 1,082,008.29 |
| Carbon monoxide (CO) | 500 | 7,269.69 | 5,814.59 | 5,028.93 |
| Particulate matter (PM10) | 50 | 634.14 | 537.50 | 637.33 |
| Chlorine and inorganic compounds (as HCl) | 10 | 230.50 | 269.80 | 186.39 |
| Ammonia (NH3) | 10 | 154.88 | 158.18 | 201.57 |
| Benzene | 1 | 44.77 | 45.47 | 46.64 |
| Vinyl chloride | 1 | 23.03 | 35.85 | 20.56 |
| Trichloroethylene | 2 | 18.67 | 32.01 | 32.12 |
| Zinc and compounds (as Zn) | 0.2 | 8.35 | 7.79 | 5.67 |
| Polycyclic aromatic hydrocarbons (PAHs) | 0.05 | 4.45 | 3.15 | (included in 'Other' in the 2024 Sustainability Statement) |
| Chromium and compounds (as Cr) | 0.1 | 3.43 | 5.89 | 5.44 |
| Ethylene oxide | 1 | 3.79 | 4.00 | (included in 'Other' in the 2024 Sustainability Statement) |
| 1,2-dichloroethane | 1 | 2.61 | 29.90 | |
| Nickel and compounds (as Ni) | 0.05 | 1.54 | 1.25 | |
| Copper and compounds (as Cu) | 0.1 | 0.52 | 0.58 | |
| Cadmium and compounds (as Cd) | 0.01 | 0.05 | 0.05 | |
| Other* | | 0.06 | 0.07 | 14.77 |
| **TOTAL** | | **50,477.29** | **51,689.85** | **1,118,824.23** |

* The item 'Other' includes: Mercury and compounds (as Hg) (0.03 in 2025 and 0.03 in 2024), Arsen and compounds (as As) (0.02 in 2025 and 0.04 in 2024).

### Table 82 Quantity of pollutants emitted to air in 2025 by business segment [tonnes]

| Pollutant | Threshold values for emissions to [tonne/year] | UPSTREAM & SUPPLY | DOWNSTREAM | ENERGY | TOTAL |
|---|---|---|---|---|---|
| Sulphur oxides (SOx/$SO_2$) | 150 | 0.00 | 15,620.67 | 5,980.54 | **21,601.21** |
| Nitrogen oxides (NOx/$NO_2$) | 100 | 669.30 | 7,469.27 | 5,895.22 | **14,033.79** |
| Non-methane volatile organic compounds (NMVOC) | 100 | 106.10 | 6,327.22 | 8.49 | **6,441.81** |
| Carbon monoxide (CO) | 500 | 1,775.74 | 4,139.88 | 1,354.07 | **7,269.69** |
| Particulate matter (PM10) | 50 | 0.00 | 501.96 | 132.18 | **634.14** |
| Chlorine and inorganic compounds (as HCl) | 10 | 0.00 | 16.06 | 214.44 | **230.50** |
| Ammonia (NH3) | 10 | 0.00 | 121.30 | 33.58 | **154.88** |
| Benzene | 1 | 2.39 | 42.38 | 0.00 | **44.77** |
| Vinyl chloride | 1 | 0.00 | 23.03 | 0.00 | **23.03** |
| Trichloroethylene | 2 | 0.00 | 18.67 | 0.00 | **18.67** |
| Zinc and compounds (as Zn) | 0.2 | 0.00 | 0.00 | 8.35 | **8.35** |
| Polycyclic aromatic hydrocarbons (PAHs) | 0.05 | 0.07 | 0.05 | 4.33 | **4.45** |
| Chromium and compounds (as Cr) | 0.1 | 0.00 | 0.98 | 2.45 | 3.43 |
| Ethylene oxide | 1 | 0.00 | 3.79 | 0.00 | **3.79** |
| Nickel and compounds (as Ni) | 1 | 0.00 | 2.61 | 0.00 | **2.61** |
| 1,2-dichloroethane | 0.05 | 0.00 | 1.25 | 0.29 | **1.54** |
| Copper and compounds (as Cu) | 0.1 | 0.00 | 0.00 | 0.52 | **0.52** |
| Cadmium and compounds (as Cd) | 0.01 | 0.00 | 0.00 | 0.05 | **0.05** |
| Other* | | 0.00 | 0.01 | 0.05 | **0.06** |
| **TOTAL** | | **2,553.60** | **34,289.13** | **13,634.56** | **50,477.29** |

* The item 'Other' includes: Mercury and compounds (as Hg) (0.03), and Arsen and compounds (as As) (0.02).

No values were recorded for the Consumers & Products and Corporate Functions segments.

ORLEN Group facilities emit air pollutants as a result of their production processes. The substances representing the largest share of our total emissions are sulphur oxides, nitrogen oxides, non-methane volatile organic compounds, carbon monoxide and particulate matter.

## Pollution of water

For the pollutants listed in Annex II to the E-PRTR Regulation, air emissions from our installations in 2024–2025 that exceeded the thresholds set out in the E-PRTR Regulation are presented in Table 83. The 2024 emissions originally reported in the 2024 Sustainability Statement were determined on the basis of emission factors, and in the 2025 reporting year they were restated to reflect actual data. The initial use of estimates was due to the lack of a complete set of measurement data at the time the 2024 Sustainability Statement was published.

Table 83 Quantity of pollutants emitted to water [tonnes]

| Pollutant | Threshold values for emissions to water per facility [tonne/year] | 2025 | 2024* (restated) | 2024 (as reported in the Sustainability Statement) |
|---|---|---|---|---|
| Chlorides (as total Cl) | 2,000 | 39,119.801 | 35,863.405 | 35,978.080 |
| Total nitrogen | 50 | 416.605 | 477.445 | 555.940 |
| Total organic carbon (TOC) (as total C or COD/3) | 50 | 333.202 | 317.413 | 377.780 |
| Fluorides (as total F) | 2 | 11.430 | 9.645 | 2.250 |
| Total phosphorus | 5 | 7.110 | 13.506 | 16.880 |
| Halogenated organic compounds (as AOX) | 1 | 5.123 | 4.010 | 5.630 |
| Zinc and compounds (as Zn) | 0.1 | 4.394 | 2.964 | 3.420 |
| Nickel and compounds (as Ni) | 0.02 | 0.851 | 0.903 | 0.850 |
| 1,2-dichloroethane (EDC) | 0.01 | 0.705 | 1.065 | 0.960 |
| Copper and compounds (as Cu) | 0.05 | 0.345 | 0.261 | 0.290 |
| Phenols (as total C) | 0.02 | 0.244 | 0.154 | total value of the item was 0.700 |
| Cyanides (as total CN) | 0.05 | 0.089 | 0.156 | (in the 2024 Sustainability Statement, these pollutants were included under ‘Other’, among other items) |
| Arsenic and compounds (as As) | 0.005 | 0.085 | 0.079 | |
| Trichloromethane | 0.01 | 0.084 | 0.104 | |
| Lead and compounds (as Pb) | 0.02 | 0.000 | 0.027 | |
| Cadmium and compounds (as Cd) | 0.005 | 0.000 | 0.036 | |
| Tetrachloroethylene (PER) | 0.01 | 0.000 | 0.020 | |
| **Total** | | **39,900.068** | **36,691.193** | **36,942.790** |

* Restated data taking into account threshold values for emissions to water per facility.

The period-to-period differences in pollutant emissions discharged to water by the ORLEN S.A. production plant in Płock are driven primarily by the composition of the raw water abstracted from the Vistula river, the characteristics of the media processed in the production units, and the intensity of precipitation in a given period.

In the ORLEN Południe Group, fluctuations in the quantities of individual pollutants in wastewater between periods result mainly from changes in the composition of spent oils delivered to the Jedlicze plant, seasonal variations in precipitation, which may lead to either concentration or dilution of pollutants, and differences in the production volumes of individual products across the production units.

In the ORLEN Lietuva Group, a slight reduction in the amount of pollutants was recorded in 2025 compared with 2024, despite a small increase in the total volume of wastewater over the same period.

## Changes y/y

In 2025, our emissions to air, water and soil remained stable in comparison to 2024, with the observed differences attributable primarily to the natural variability inherent in the nature of our operations.

Changes in the reported indicator values were driven by fluctuations in the scale of our production or operational processes, technological changes such as unit upgrades, temporary shutdowns or modifications to process media, as well as varying levels of operational activity. Other material factors included atmospheric conditions affecting combustion emissions and the variable composition of raw materials and waste directed for treatment. In selected areas, emission levels were also influenced by differences in the volumes of biogas or energy generated.

Some Group companies recorded a decrease in emissions resulting from reduced operation of specific equipment, the discontinuation of selected production processes, implemented upgrades, or a natural decline in the scale of operations. On the other hand, certain increases in pollutant loads were associated with intensified production activity or changes in the mix of fuels and raw materials used.

In many companies, it was confirmed that no wastewater was discharged directly into water bodies or soil, there were no emissions from installations for which the mandatory thresholds defined in the E-PRTR Regulation were exceeded, and no new cases of soil contamination, apart from historical cases subject to ongoing remediation. Therefore those cases were not included in above comparisons.

## Measurement methodologies

In 2025, emissions to air, water and soil were monitored at the ORLEN Group using a combination of measurement-based methods, calculation-based approaches and activities aimed at assessing environmental conditions. Direct measurements were conducted wherever required by applicable

laws or the terms of permits, and included continuous monitoring of emission sources using CEMS or AMS systems, periodic measurement campaigns performed by accredited laboratories, wastewater sampling – including composite daily samples – as well as soil quality testing carried out in accordance with applicable regulations on assessing land surface contamination. The measurement methods applied at the Group were based on PN-EN and ISO standards, Best Available Techniques (BAT), and industry-specific methodologies relating, inter alia, to emissions of ammonia, particulate matter, heavy metals, polycyclic aromatic hydrocarbons and wastewater parameters.

Where direct measurements were not feasible, we used estimation methods based on various data, including KOBiZE emission factors and literature-based indicators from recognised sources such as CONCAWE or PRTR guidelines, as well as mass balance algorithms, process parameters relating to fuel consumption and equipment operating time, and values specified in integrated permits.

In parallel, we conducted environmental monitoring activities, including wastewater quality checks in accordance with water permit requirements, periodic testing of water and soil, including in areas undergoing remediation, and measurements of key process parameters at wastewater discharge installations, such as pH, temperature and flow rates.

We follow relevant national standards, applied on the basis of European standards, in calibrating our automated measurement systems and verifying periodic measurement results. These standards set out, among other things, the requirements governing the operation of automated measurement systems to ensure an appropriate quality of emissions monitoring. Compliance with those requirements is achieved through quality assurance procedures (QAL) for automated measurement systems (AMS) used at industrial sites. All data collected are transferred to a centralised database, where they are verified, aggregated, organised, checked, grouped and compiled before the final reported emissions figures are established.

## Data collection

We use an extensive data collection system, including:

- reports from measurements conducted by accredited laboratories;
- automatic monitoring systems for emitters;
- operational and production documentation;
- records of fuel, material and utilities consumption;
- monthly/quarterly operational reports;
- system registers (e.g. KOBiZE, PRTR);
- environmental testing reports;
- data from fleet and field equipment management systems;
- data from water and wastewater systems, as well as readings from measurement devices.

The data is additionally verified through:

- internal audits;
- inspections by administrative authorities;
- reviews required under environmental management systems (ISO 14001);
- comparisons with previous reporting periods.

## Measurement methods

Where calculation-based methods or other indirect approaches were applied, ORLEN Group companies reported that their use resulted primarily from technical constraints preventing direct measurement or from the disproportionately high cost of such measurements. At the same time, the emission factors and input data used were derived from reliable regulatory and industry sources, ensuring consistency and alignment with established standards. The level of uncertainty associated with these calculations remains low due to the stable nature of our technological processes, while methods based on fuel consumption and the corresponding emission factors ensure the repeatability of results. The approaches adopted in the calculations comply with the requirements of applicable environmental permits and reflect common market practice.

At certain Group locations, the very low level of emissions means that no measurement obligation applies, while the absence of installations subject to IED/BAT requirements eliminates the need for continuous monitoring systems such as AMS.

## Microplastics

Due to the nature of our operations, the identified potential sources of microplastic emissions are mainly related to unintentional releases of primary and secondary synthetic polymer microparticles (SPM). A key measure applied to limit such emissions is the implementation of effective industry standards, such as the Operation Clean Sweep (OCS) programme, as well as continual education and awareness-raising among employees in the area of responsible management of polymer materials. As a producer of plastics, the ORLEN Group continuously monitors the evolving regulatory environment applicable to microplastics production and emissions, and complies with obligations arising from new regulations. Currently, there is no harmonised, widely recognised methodology for estimating microplastic emissions to the environment that would enable the presentation of comparable data across all reporting companies. Consequently, we do not have the technical capacity to present quantitative indicators of SPM emissions. We recognise the need for further development of monitoring and reporting systems for such emissions in order to enable a more comprehensive assessment of the impact of our operations.

In addition, we actively participate in initiatives of industry organisations addressing microplastics, such as the European Chemical Industry Council (CEFIC) and Plastics Europe Polska. One of their

priorities is to develop reliable and consistent methodologies for estimating microplastic emissions, supporting both companies and regulators in effectively limiting their release into the environment.

### 6.4.5 Substances of concern [E2-5]

ORLEN Group companies produce, procure and use substances of concern in their operations. We continuously monitor substances of concern used in our processes in order to ensure safe working conditions and compliance with applicable legal requirements. The volumes presented in Table 76 are provided for individual hazard classes, meaning that if a given substance is classified in multiple hazard classes, its volume is reported under each of them. The quantities of substances of concern produced by the ORLEN Group have been calculated on the basis of internal reports from individual companies. The quantities of substances of concern that are procured have been determined based on safety data sheets. In the case of mixtures, we take into account substances listed in Section 3.2 of the safety data sheet that meet the definition of substances of concern; where concentration ranges are indicated, the upper bound of the concentration range is applied in accordance with the precautionary principle. To avoid double counting of the volumes transferred between ORLEN Group companies, each volume is reported only once. For substances purchased from outside the ORLEN Group, the volume is reported solely by the first acquiring company. For internally produced substances, the volume is reported only by the producing company. The restated 2024 data mainly reflect the inclusion of Rafineria Gdańska in the consolidated data and adjustments to data reported by Group companies.

Table 84 Quantity of substances of concern [tonnes]

| Hazard class and category | Substances of concern that are generated or used during the production or that are procured | | | Substances of concern that leave the undertaking's facilities as emissions, as products, or as part of products or services | | |
|---|---|---|---|---|---|---|
| | 2025 | 2024 (restated) | 2024 (as reported in the Sustainability Statement) | 2025 | 2024 (restated) | 2024 (as reported in the Sustainability Statement) |
| Carcinogenicity categories 1 and 2 | 83,757,798.32 | 100,948,856.13 | 100,946,320.00 | 42,057,445.17 | 51,315,120.57 | 51,315,120.57 |
| Germ cell mutagenicity categories 1 and 2 | 61,542,852.50 | 58,540,365.98 | 58,539,920.90 | 14,980,437.61 | 18,986,227.47 | 18,986,227.47 |
| Reproductive toxicity categories 1 and 2 | 71,340,684.18 | 68,620,646.65 | 68,620,290.81 | 33,863,561.93 | 25,060,433.72 | 25,060,433.72 |
| Endocrine disruption for human health | 4.17 | 5.01 | 5.01 | 0.00 | 0.00 | 0.00 |
| Endocrine disruption for the environment | 4.17 | 5.01 | 5.01 | 0.00 | 0.00 | 0.00 |
| Properties of persistent, mobile and toxic or very persistent and very mobile substances | 4.24 | 4.28 | 4.28 | 0.43 | 2.04 | 2.04 |
| Properties of persistent, bioaccumulative and toxic or very persistent, very bioaccumulative substances | 516,327.15 | 350.67 | 350.67 | 510,786.54 | 0.00 | 0.00 |
| Respiratory sensitisation category 1 | 517,501.70 | 312.01 | 313.20 | 510,798.25 | 273.03 | 273.03 |
| Skin sensitisation category 1 | 4,652.76 | 14,975.51 | 1,732.19 | 903.50 | 1,204.42 | 1,807,643.24 |
| Chronic hazard to the aquatic environment categories 1 to 4 | 92,963,871.49 | 107,613,964.64 | 107,611,965.67 | 43,004,620.19 | 52,432,427.48 | 52,432,427.48 |
| Hazardous to the ozone layer | 0.00 | 0.00 | N/A | 0.00 | 0.00 | N/A |
| Specific target organ toxicity, repeated exposure categories 1 and 2 | 68,831,964.40 | 84,804,457.74 | 84,802,251.06 | 24,142,538.12 | 37,882,901.18 | 37,882,901.18 |
| Specific target organ toxicity – single exposure categories 1 and 2 | 81,240.13 | 128,254.35 | 127,478.68 | 26,435.48 | 31,412.92 | 31,412.92 |
| Negatively affects the re-use and recycling of materials in the product in which it is present, as defined in relevant Union product-specific ecodesign requirements | 0.00 | 0.00 | N/A | 0.00 | 0.00 | N/A |
| No category | 0.00 | 6,820.19 | 6,820.19 | 0.00 | 6,547.19 | 6,547.19 |

Since some substances of concern are included in multiple categories, we do not report the total quantity.

### 6.4.6 Substances of very high concern [E2-5]

The ORLEN Group does not produce substances of very high concern. However, such substances are used in our operations. We continuously monitor substances of very high concern used in our processes to ensure safe working conditions and compliance with applicable legal requirements. We also monitor on an ongoing basis the list of substances of very high concern published by the European Chemicals Agency. The quantities of substances of very high concern that are procured have been determined on the basis of safety data sheets. In the case of mixtures, we take into account substances listed in Section 3.2 of the safety data sheet that meet the definition of substances of very high concern; where concentration ranges are indicated, the upper bound of the concentration range is applied in accordance with the precautionary principle. The list of substances of very high concern is updated twice a year by the European Chemicals Agency, therefore the number of reported SVHCs is increasing. Year-on-year volume differences are also due to varying volumes of purchased additives and auxiliary chemicals, which depend on the production plans for a given year. The restated 2024 data mainly reflect the inclusion of Rafineria Gdańska in the consolidated data and adjustments to data reported by Group companies.

## Table 85 Quantity of substances of very high concern [tonnes]

| Substance | Substances of very high concern that are generated or used in production or that are procured [INFLOWS] | | | Substances of very high concern that leave the undertaking's facilities as emissions, as products, or as part of products or services [OUTFLOWS] | | |
|---|---|---|---|---|---|---|
| | 2025 | 2024 (restated) | 2024 (as reported in the Sustainability Statement) | 2025 | 2024 (restated) | 2024 (as reported in the Sustainability Statement) |
| 1,2-dichloroethane | 295,409.00000000 | 346,468.00000000 | 346,468.00000000 | 5,573.80000000 | 0.00000000 | 0.00000000 |
| Terphenyl, hydrogenated | 321.46000000 | 22.90000000 | N/A | 0.00000000 | 0.00000000 | N/A |
| 2,4,6-tri-tert-butylphenol | 213.63633510 | 8.24500000 | N/A | 0.00000000 | 0.00000000 | N/A |
| N,N-dimethylformamide | 76.21200000 | 120.01202000 | N/A | 0.00000000 | 0.00000000 | N/A |
| 1-Methyl-2-pyrrolidone (NMP) | 23.95010000 | 19.59211500 | 19.59000000 | 4.50000000 | 5.00000000 | 5.00000000 |
| Phenol, dodecyl-, branched | 10.67794096 | 1.40065544 | 1.40000000 | 6.84521363 | 0.00355064 | 0.00000000 |
| O,O,O-triphenyl phosphorothioate | 3.73172685 | 0.00000000 | N/A | 6.38822676 | 0.00000000 | N/A |
| 4,4'-isopropylidenediphenol | 2.42000000 | 3.00000000 | 3.00000000 | 0.01575000 | 0.00000000 | 0.00000000 |
| Trichloroethylene | 1.82042500 | 0.00000000 | N/A | 1.61890000 | 0.00000000 | N/A |
| reaction mass of: triphenylthiophosphate and tertiary butylated phenyl derivatives | 0.66500000 | 0.00000000 | N/A | 0.57750105 | 0.00000000 | N/A |
| Phenol, (tetrapropenyl) derivatives | 0.58678000 | 0.00000731 | N/A | 0.57165821 | 0.00000000 | N/A |
| Tetraethyllead | 0.37498050 | 0.55700000 | N/A | 0.00000000 | 0.00000000 | N/A |
| glutaral | 0.35000000 | 0.35300000 | N/A | 0.00000000 | 0.00000000 | N/A |
| Chromium trioxide | 0.31920732 | 0.00000000 | N/A | 0.12826732 | 0.00000000 | N/A |
| Alkanes, C14-17, chloro | 0.17830000 | 0.18040000 | 0.18000000 | 0.00000000 | 0.00000000 | 0.00000000 |
| Boric acid | 0.16300254 | 0.01960000 | 0.04000000 | 0.13679774 | 0.15675228 | 0.18000000 |
| Hydrazine | 0.14400000 | 0.00000000 | N/A | 0.00000000 | 0.00000000 | N/A |
| 4-tert-butylphenol | 0.13787512 | 0.03600000 | 0.04000000 | 0.06196500 | 0.01850500 | 0.02000000 |
| Disodium tetraborate, anhydrous | 0.12439000 | 0.12686000 | 0.13000000 | 0.00000000 | 0.00000000 | 0.00000000 |
| Triphenyl phosphate | 0.08585583 | 0.00071890 | 0.00000000 | 0.04657584 | 0.02858945 | 0.03000000 |
| Phenol, methylstyrenated* | 0.06490000 | 39,103.00000000 | 39,103.00000000 | 0.00000000 | 0.00000000 | 0.00000000 |
| Sulfuric acid, cadmium salt, hydrate (3:3:8) | 0.02400000 | 0.00000000 | N/A | 0.03400000 | 0.00000000 | N/A |
| Phenol, heptyl derivs. | 0.02016500 | 0.00000000 | 0.00000000 | 0.02807428 | 0.02224969 | 0.02000000 |
| S-(tricyclo(5.2.1.0'2,6)deca-3-en-8(or 9)-yl O-(isopropyl or isobutyl or 2-ethylhexyl) O-(isopropyl or isobutyl or 2-ethylhexyl) phosphorodithioate | 0.01733804 | 0.05011800 | 0.05000000 | 0.00000000 | 0.00000000 | 0.00000000 |
| Lead dinitrate | 0.01380032 | 0.00100005 | N/A | 0.00000016 | 0.00000005 | N/A |
| 2-methylimidazole | 0.00985000 | 0.00100000 | N/A | 0.00000000 | 0.00000000 | N/A |
| Bis (2-ethylhexyl)phthalate (DEHP) | 0.00920000 | 0.00000000 | N/A | 0.00000000 | 0.00000000 | N/A |

| Substance | Substances of very high concern that are generated or used in production or that are procured [INFLOWS] | | | Substances of very high concern that leave the undertaking's facilities as emissions, as products, or as part of products or services [OUTFLOWS] | | |
|---|---|---|---|---|---|---|
| | 2025 | 2024 (restated) | 2024 (as reported in the Sustainability Statement) | 2025 | 2024 (restated) | 2024 (as reported in the Sustainability Statement) |
| Phenol, 4-nonyl-, branched | 0.00665000 | 0.00000000 | 0.00000000 | 0.00577501 | 0.06379112 | 0.06000000 |
| Potassium dichromate | 0.00649720 | 0.00000260 | N/A | 0.00150000 | 0.00000000 | N/A |
| Phenolphthalein | 0.00339300 | 0.00160313 | N/A | 0.00150000 | 0.00010000 | N/A |
| 4-Nonylphenol, branched, ethoxylated | 0.00260000 | 0.00240000 | N/A | 0.00000000 | 0.00000000 | N/A |
| Potassium chromate | 0.00097500 | 0.00003800 | N/A | 0.00000000 | 0.00001300 | N/A |
| Lead | 0.00080000 | 22.90072160 | 22.90000000 | 0.00000000 | 0.12002160 | 0.12000000 |
| Octamethylcyclotetrasiloxane | 0.00062460 | 0.00019987 | N/A | 0.00038355 | 0.00040048 | N/A |
| Melamine | 0.00050000 | 0.00270000 | N/A | 0.00050000 | 0.00000000 | N/A |
| Cadmium chloride | 0.00050000 | 0.00050000 | N/A | 0.00050000 | 0.00050000 | N/A |
| Dodecamethylcyclohexasiloxane | 0.00017075 | 0.00034263 | N/A | 0.00015140 | 0.00026409 | N/A |
| Cobalt dichloride | 0.00011000 | 0.00000000 | N/A | 0.00011000 | 0.00000000 | N/A |
| Decamethylcyclopentasiloxane | 0.00009960 | 0.00019987 | N/A | 0.00008831 | 0.00015406 | N/A |
| Ammonium dichromate | 0.00001000 | 0.00000007 | N/A | 0.00000000 | 0.00000005 | N/A |
| Chrysene | 0.00000100 | 0.00000000 | N/A | 0.00000100 | 0.00000000 | N/A |
| Arsenic acid | 0.00000073 | 0.00000250 | N/A | 0.00000025 | 0.00000000 | N/A |
| Cadmium nitrate | 0.00000034 | 0.00000005 | N/A | 0.00000002 | 0.00000005 | N/A |
| Cobalt(II) dinitrate | 0.00000031 | 0.00000005 | N/A | 0.00000000 | 0.00000005 | N/A |
| Cadmium fluoride | 0.00000005 | 0.00000000 | N/A | 0.00000000 | 0.00000000 | N/A |
| Benzo[def]chrysene (Benzo[a]pyrene) | 0.00000000 | 0.00000000 | N/A | 0.00000281 | 0.00000281 | N/A |
| Bis(α,α-dimethylbenzyl) peroxide | 0.00000000 | 64,398.01300000 | 64,398.01000000 | 0.00000000 | 0.00020000 | 0.00000000 |
| Oligomerisation and alkylation reaction products of 2-phenylpropene and phenol | 0.00000000 | 13,397.80000000 | 13,397.80000000 | 0.00000000 | 0.00000000 | 0.00000000 |
| Bumetrizole (UV-326) | 0.00000000 | 238.00000000 | 238.00000000 | 0.00000000 | 0.00000000 | 0.00000000 |
| Methoxyacetic acid | 0.00000000 | 120.01200000 | 120.01000000 | 0.00000000 | 0.00000000 | 0.00000000 |
| 2-(dimethylamino)-2-[(4-methylphenyl)methyl]-1-[4-(morpholin-4-yl)phenyl]butan-1-one | 0.00000000 | 44.30500000 | 44.31000000 | 0.00000000 | 0.00000000 | 0.00000000 |
| [4-[4,4'-bis(dimethylamino) benzhydrylidene]cyclohexa-2,5-dien-1-ylidene]dimethylammonium chloride (C.I. Basic Violet 3) | 0.00000000 | 19.37900000 | 19.38000000 | 0.00000000 | 0.00000000 | 0.00000000 |
| bis(4-chlorophenyl) sulphone | 0.00000000 | 8.24500000 | 8.25000000 | 0.00000000 | 0.00000000 | 0.00000000 |
| Phenol, tetrapropylene- | 0.00000000 | 4.62400000 | 4.62000000 | 0.00000000 | 0.00000000 | 0.00000000 |
| 6,6'-di-tert-butyl-2,2'-methylenedi-p-cresol | 0.00000000 | 1.47480200 | 1.47000000 | 0.00000000 | 1.47000000 | 1.47000000 |
| Silicic acid, lead salt | 0.00000000 | 0.55700000 | 0.56000000 | 0.00000000 | 0.00000000 | 0.00000000 |
| Diazene-1,2-dicarboxamide (C,C'-azodi(formamide)) (ADCA) | 0.00000000 | 0.35000000 | 0.35000000 | 0.00000000 | 0.35000000 | 0.35000000 |

| Substance | Substances of very high concern that are generated or used in production or that are procured [INFLOWS] | | | Substances of very high concern that leave the undertaking's facilities as emissions, as products, or as part of products or services [OUTFLOWS] | | |
|---|---|---|---|---|---|---|
| | 2025 | 2024 (restated) | 2024 (as reported in the Sustainability Statement) | 2025 | 2024 (restated) | 2024 (as reported in the Sustainability Statement) |
| 2,3,3,3-tetrafluoro-2-(heptafluoropropoxy)propionic acid, its salts and its acyl halides | 0.00000000 | 0.15300000 | 0.15000000 | 0.00000000 | 0.00000000 | 0.00000000 |
| Ethylenediamine | 0.00000000 | 0.10100000 | 0.10000000 | 0.00000000 | 0.00000000 | 0.00000000 |
| Diboron trioxide | 0.00000000 | 6.83351800 | 0.05000000 | 0.00000000 | 0.05280000 | 0.05000000 |
| Sulfuric acid, cadmium salt (1:1), hydrate | 0.00000000 | 0.03000000 | 0.03000000 | 0.00000000 | 0.02000000 | 0.02000000 |
| 2-(4-tert-butylbenzyl)propionaldehyde and its individual stereoisomers | 0.00000000 | 0.01300000 | 0.01000000 | 0.00000000 | 0.00000000 | 0.00000000 |
| Cobalt(II) sulphate | 0.00000000 | 0.01160000 | 0.01000000 | 0.00000000 | 0.00000000 | 0.00000000 |
| Cadmium | 0.00000000 | 0.00000000 | 0.00000000 | 0.00000000 | 0.05000000 | 0.05000000 |
| Phenol, dodecyl-, branched; Phenol, 2-dodecyl-, branched; Phenol, 3-dodecyl-, branched; | 0.00000000 | 0.00000000 | 0.00000000 | 0.00000000 | 7.02837121 | 7.03000000 |
| Phenol, (tetrapropenyl) derivs. | 0.00000000 | 0.00000000 | 0.00000000 | 0.00000000 | 0.54277134 | 0.54000000 |
| **TOTAL** | **296,066.22010516** | **464,010.28612507** | **463,851.44000000** | **5,594.76344234** | **14.92903698** | **14.94000000** |

* In 2025, ORLEN S.A. discontinued the production of phenol. The production unit was shut down and there are no plans to bring it back online.

## 6.5 Water and marine resources [ESRS E3]

### Table 86 Double materiality assessment summary for water and marine resources [E3.IRO-1]

| Segment | Area | Geographical region | E3<br>Risk, opportunity, impact | Impact (I)<br>Risk (R)<br>Opportunity (O) | Positive (+)<br>Negative (-) | Actual (A)<br>Potential (P) | Value chain<br>Organisation (O)<br>Downstream (D)<br>Upstream (U) |
|---|---|---|---|---|---|---|---|
| Upstream & Supply, Downstream, Energy, Consumers & Products | Refining, Upstream, Energy, Petrochemicals, Gas | Europe, North America | **Water consumption** | | | | |
| | | | Water consumption in operational processes | I | - | A | O, U |
| | | | **Water withdrawal** | | | | |
| | | | Water withdrawal for operational processes | I | - | A | O, U |
| | | | Increased costs of water purchase/ water use | R | | | O, U |
| | | | **Water discharge** | | | | |
| | | | Wastewater discharge from operations | I | - | A | O |
| | | | Rising costs to implement measures to reduce water discharge volumes or alter water discharge methods | R | | | O |

| | | short-term | medium-term | long-term |
|---|---|---|---|---|
| Water withdrawals | R | | ✓ | ✓ |
| Water discharges | R | | ✓ | ✓ |

In our operations, we use a comprehensive water and marine resources management system that integrates regulatory requirements with operational solutions tailored to the local context of each installation. The system covers the full water use cycle – from withdrawal, through consumption and process circulation, to discharge, retention and reuse. Processes are conducted in accordance with applicable water and integrated permits, and are subject to regular monitoring under formal compliance programmes. Our operations are materially dependent on the availability of water resources of sufficient volume and quality. The most water intensive segment of our operations in Energy. Significant water volumes are also used in the Refining, Petrochemicals and Consumers & Products segments, including in car wash operations.

In the area of water and marine resources, we identified impacts, risks and opportunities related to our operations and the transition to a more efficient business model in relation to water consumption, withdrawals from surface water, groundwater and seawater, as well as wastewater discharge. Our impacts are managed by using water treatment technologies, reducing pollutant loads in line with relevant permits, and monitoring quantitative and qualitative parameters. Our key impacts relate to water consumption in operations. These are actual impacts, occurring mainly in our own operations.

Upgrades to our assets undertaken to meet new environmental requirements, including the replacement of highly water-intensive facilities, create opportunities to reduce water-related costs. We focus on identifying and implementing solutions whose outcomes can be verified through operational data.

We have assessed our exposure to water-related risks, including areas of significant water scarcity, using available analytical tools and environmental data, in particular the WRI Aqueduct Water Risk Atlas.

As at the reporting date, we identified operations in areas of high water stress. In addition, in selected locations, other risks are present (e.g. flood risk and water protection areas in Austria; surface water withdrawals in the Czech Republic/Elbe catchment), which are addressed through legal requirements applicable to design, construction and operation, as well as through compliance frameworks.

Stakeholder engagement, including with potentially affected communities, takes place primarily through formal procedures required by law, such as environmental impact assessments and environmental decision and water permitting processes. Based on available information, no additional standalone consultations focused exclusively on water resources were conducted during the reporting period.

### 6.5.1 Policies related to water and marine resources [E3-1]

ORLEN Group companies apply various water use models, including withdrawals from surface water and groundwater for process purposes, the purchase of water from external networks, the use of marine water, and the reduction of discharges through retention and recirculation of water streams within processes. At sites with low process intensity, water withdrawals are limited to domestic and fire protection purposes, while discharges consist of stormwater and snowmelt.

In 2025, we developed the ORLEN Group Water and Wastewater Management Policy, which further elaborates on the ORLEN 2035 Strategy, the ORLEN Group Sustainable Development Strategy and the European Water Resilience Strategy. The Policy defines the directions of action and resources required for responsible, sustainable and safe water use, with a particular focus on sites exposed to water risk.

These policies reflect applicable regulatory requirements at international, EU and national levels, as well as the technological and site-specific characteristics of each installation. Within our governance framework, policies are approved at management level, with their implementation overseen by designated organisational units. This includes water-related due diligence, environmental audits, training, oversight of water and integrated permits, and analysis of environmental incidents. As at the reporting date, all Group sites were covered by applicable policies.

In addition, we have a number of environmental procedures, instructions and internal orders in place, many of which apply to water resource management. They address in particular compliance with obligations arising from water and integrated permits for installations operated by Group companies.

### 6.5.2 Actions and resources related to water and marine resources [E3-2]

Depending on the local context, we apply different water use models, including withdrawals from surface water and groundwater, external sourcing, the use of marine water, and the reduction of discharges through retention and recirculation within processes. At sites with low process intensity, water withdrawals are limited to domestic and fire protection purposes, while discharges mainly consist of stormwater and snowmelt. Operational principles focus on reducing water consumption, improving efficiency and recirculation, implementing Best Available Techniques, preventing pollution, and adopting a risk-based approach. Water treatment is aligned with the pollution profile, and wastewater is directed to authorised treatment facilities. The management system ensures compliance with applicable water and integrated permits and is supported by local operating procedures, quantitative and qualitative monitoring, environmental audits, incident analysis and, at selected sites, EMAS, ISO 14001 and ISO 50001 systems. Roles and responsibilities for compliance, reporting and risk escalation are assigned at management level, with oversight based on harmonised data standards, review schedules and clearly designated process owners.

We implement water management actions tailored to the location and nature of our operations on an ongoing basis. These include:

- optimising water withdrawals through water balancing and reducing freshwater use where alternative sources are available;

- using marine water for equipment cooling and reservoir injection; the monitoring of impacts and water quality has confirmed no negative impact on the receiving water body; the volumes of extracted reservoir fluids are balanced by water injection;
- implementing closed-loop systems, recirculation and reuse;
- pre-treating and managing stormwater and snowmelt;
- applying Best Available Techniques and upgrading water and wastewater treatment systems;
- conducting continuous and periodic monitoring of the quantity and quality of water withdrawn and discharged, in line with relevant permit conditions;
- implementing preventive measures and environmental incident response procedures;
- using marine water in technological processes exclusively within the scope allowed by applicable permits and supported by impact monitoring;
- taking operational measures informed by stakeholder engagement across the value chain, including its upstream and downstream segments;
- applying procedural and organisational measures within the Integrated Management System, including setting environmental objectives and actions at the level of individual Group companies;
- implementing technical solutions such as recirculation, alternative water sourcing and resource efficiency technologies;
- implementing educational initiatives to raise employee awareness of sustainability and water conservation.

Those actiones are focused on the Group’s operations.

## Actions in areas at water risk

Each form of the ORLEN Group's operations in areas with high water stress has been identified and is monitored. Our actions and resource allocation are aligned with local hydrological conditions, the nature of operations and the scale of potential impacts. Where required, we take remedial measures to reduce water consumption and minimise negative impacts on local water resources, including through actions to improve the efficiency of water and wastewater processes. In particularly vulnerable areas, we conduct regular risk reviews and carry out business continuity plans, taking into account the potential effects of climate change.

## Investment projects – product and service design

Water intensity is one of the aspects we consider in our development processes. Technologies and process solutions are designed to reduce water demand during the use phase and across the value chain.

Investment projects are preceded by environmental impact assessments and, where required, field studies. Environmental documentation is submitted to competent authorities and disclosed to affected communities and other stakeholders in accordance with applicable procedures. For projects or initiatives with a potential impact on local water resources, we engage with stakeholders, including public authorities and local communities, as part of formal administrative procedures. This engagement takes place through environmental impact assessments and water permitting processes.

Product and service design to address water-related challenges includes:

- designing with due regard for water resources, including reducing water demand during use and servicing;
- process solutions enabling water reuse and reduced water withdrawals at user level and across the value chain (e.g. recovery of condensate and wash water);
- innovation and digitalisation, including remote measurement and automated control of loads and quality.

In practice, we implement solutions to minimise environmental impacts, including closed-loop systems, stormwater pre-treatment and management, and technologies that reduce water use in welfare and amenity facilities. In the Retail segment, particularly in car wash operations, treatment and recycling systems are used to reduce freshwater withdrawals; more than 91% of our car washes are equipped with water treatment systems, and pilot digital water meters are being introduced at selected sites to improve data quality. In our industrial operations, initiatives focus on optimising water use, upgrading water and wastewater infrastructure, and reducing water losses.

In several areas, new projects have been implemented to develop closed-loop and water reuse systems, including:

- recovery and reuse of process water;
- production of utility water from treated wastewater;
- use of steam condensate and process water as inputs for other process units;
- implementation of recirculation and filtration systems;
- design and construction of water recirculation systems, including under EPC arrangements;
- use of greywater systems in sanitary installations;
- retention of stormwater for maintaining green areas;
- closing selected process loops to reduce freshwater withdrawals.

We incurred the following operating costs in relation to **water and wastewater management actions at ORLEN Group facilities**:

- operating expenditure on water recovery and reuse, including maintenance of circular economy systems;
- operating costs related to monitoring, analysis and regulatory compliance;
- expenditure on retention infrastructure and water reuse systems.

These costs include technological upgrades, filtration systems, water retention, remediation and closed-loop systems.

In the period covered by our Sustainable Development Strategy, i.e. by 2035, we intend to complete projects related to wastewater treatment plants. The Termika Group plans to construct facilities for recovering heat from municipal wastewater and cooling water. Total expenditure on these investments over the period to 2035 will amount to PLN 3,904 million.

In 2025, ORLEN S.A.'s water-related expenditure was mainly operating expenditure and totalled PLN 14.8 million. We identified no capital or operating expenditure within the ORLEN Group dedicated exclusively to areas of significant water scarcity.

### Collective actions and stakeholder engagement

Given the shared nature of water resources, we implemented certain actions in collaboration with:

- suppliers of water and wastewater technologies;
- contractors, including EPC contractors;
- public authorities and environmental inspection bodies;
- entities responsible for monitoring and laboratory analysis;
- industry partners and system operators;
- service providers using water recycling solutions.

## 6.5.3 Targets related to water and marine resources [E3-3]

We have not defined measurable targets to assess our progress in the area of water and marine resources. We seek to optimise water consumption within the ORLEN Group in accordance with the Sustainable Development Strategy for 2025–2035.

Furthermore, we pursue strategic objectives focused on reducing water-related impacts, in particular:

- calculating the water footprint of ORLEN S.A. by the end of 2026;
- calculating the water footprint of the ORLEN Group by 2030;
- reducing water consumption where technologically feasible;
- increasing recirculation and reuse;
- developing water replenishment plans for water-scarce areas;
- advancing circular economy practices, including closing water loops (e.g. through car wash upgrades).

In 2025, we initiated a project (Phase 0) to prepare for the calculation of our water footprint. It included workshops, the definition of scope and methodology, and the selection of an expert partner to provide validation and methodological support. For 2026, we plan detailed mapping of the Refining area of ORLEN S.A.'s production plant in Płock. It will include the identification of water withdrawal sources, water-using processes, consumption streams, discharges, storage, recirculation and the classification of water types. The project will provide a basis for a harmonised methodology for water footprint calculation at Group level.

From 2026, we plan to implement a consistent strategic approach to environmental policies, aligned with the ORLEN 2035 Strategy and the Sustainable Development Strategy for 2025–2035. The process will include:

- defining environmental objectives and implementation pathways;
- establishing measurable and monitorable key performance indicators (KPIs);
- monitoring progress in environmental policy implementation.

## 6.5.4 Water consumption [E3-4]

Data on water consumption across the ORLEN Group are based on direct measurements obtained from metering devices. The information is stored in dedicated IT systems. For reporting purposes, we define stored water as water kept exclusively for fire protection. Water levels in other process tanks are subject to variability, which makes it impossible to determine a fixed volume of retained water.

## Water withdrawal

### Table 87 Water withdrawals [m³]

| Item | 2025 | 2024 (restated) | 2024 (as reported in the Sustainability Statement) |
|---|---|---|---|
| Total water withdrawals | 22,516,562,685 | 33,931,804,157 | N/A |

The significant decline in the amount of water withdrawn in 2025 was mainly attributable to lower water volumes withdrawn for energy generation at the ENERGA Group. The lower water intake by the hydroelectric power station in Włocławek in 2025 was due solely to the hydrological conditions of that year. For the River Vistula, it was a year of record-low water levels, which meant very low flows through the power station – flows that are its source of energy production.

## Discharge of cooling water

### Table 88 Discharges of cooling water [m³]

| Item | 2025 | 2024 (restated) | 2024 (as reported in the Sustainability Statement) |
|---|---|---|---|
| Discharges of cooling water* | 559,717,593 | 515,481,703 | N/A |

* Non-wastewater – water from the cooling circuits of power or combined heat-and-power plants operating as once-through (single-pass) cooling systems. Non-wastewater.

## Changes in total water/wastewater discharge volumes

### Table 89 Water/wastewater discharges by receiving environment [m³]

| Item | 2025 | 2024 (restated) | 2024 (as reported in the Sustainability Statement) |
|---|---|---|---|
| Inland flowing waters | 22,464,968,388 | 33,884,512,144 | N/A |
| Marine waters | 1,798,343 | 1,802,340 | N/A |
| Ground | 178,556 | 238,994 | N/A |
| Third-party sewerage system | 3,131,119 | 3,201,719 | N/A |
| **Total water/wastewater discharge volumes** | **22,470,076,406** | **33,889,755,197** | **N/A** |

The significant decline in the amount of water/wastewater discharged to inland flowing waters in 2025 was mainly attributable to lower water volumes withdrawn for energy generation at the ENERGA Group. It is primarily due to a reduction in water withdraws in 2025 for the purpose of electricity production at hydroelectric power stations.

## Changes in water storage volumes

### Table 90 Volume of water stored [m³]

| Item | 2025 | 2024 (restated) | 2024 (as reported in the Sustainability Statement) |
|---|---|---|---|
| Volume of water stored | 7,401,431 | 10,289,224 | 10,547,051.19 |

## Water consumption

### Table 91 Water consumption [m³]

| Item | 2025 | 2024 (restated) | 2024 (as reported in the Sustainability Statement) |
|---|---|---|---|
| Total water consumption | 53,471,627 | 57,019,737 | 49,107,180.25 |
| Total water consumption in areas at water risk, including areas of high water stress** | 45,835 | 46,462 | 8,097,883.38 |
| Total water recycled and reused | 7,858,706 | 7,108,469 | 7,670,839.75 |
| Water intensity* [m³/EUR 1 million] | 845.96 | 832.27 | 716.56 |
| Water intensity* [m³/PLN 1 million] | 199.65 | 193.36 | 166.53 |

* Total water consumption per EUR 1 million respectively PLN 1 million of the ORLEN Group's revenue.
** The areas at water risk were determined based on the Aqueduct Water Risk Atlas. These include the sites of the ORLEN Group's oil and gas production facilities and gas compressor stations in Poland, as well as the area of our operations in Pakistan.

The significant decline in water consumption in 2025 was mainly attributable to the limited operation of SPOLANA and PARAMO plants in the Unipetrol Group.

## 6.6 Biodiversity and ecosystems [ESRS E4]

As part of our investment activities, we carry out projects that are likely to have a significant impact on the environment, and therefore their implementation requires an environmental decision. Such decisions are based on an environmental impact analysis prepared either in the form of a Project Information Sheet or an Environmental Impact Assessment Report, which includes an assessment of the project's impact on local biodiversity and ecosystems.

The authority conducting the proceedings (the commune head, the city mayor, or the Regional Directorate for Environmental Protection specifies the conditions for the project or decides whether a full environmental impact assessment (EIA) is required, based on the Project Information Sheet and the opinions of other institutions. For projects that are always likely to have a significant impact on the environment, or where the authority considers it necessary, an Environmental Impact Assessment Report must be prepared and the decision-making procedure must include public participation.

ORLEN Group companies are required to comply with the conditions set out in environmental decisions, including by applying measures to limit potential negative impacts during project construction, operation and, where required, after its decommissioning.

**[E4.IRO-1]**

Our material biodiversity- and ecosystem-related impacts, dependencies and related risks and opportunities arise primarily from the nature of our operations and capital investments in the Upstream & Supply, Downstream and Energy segments, and, to a lesser extent and in a more dispersed manner, also in the Consumers & Products segment. Our business model includes the production of hydrocarbons, refining and petrochemical operations, the generation and distribution of electricity and gas, as well as an extensive retail network.

In these areas, we identify impacts primarily related to greenhouse gas emissions and other pollution, land-use change, and the potential impact of our projects on areas of high natural value. Our dependencies and main physical risks relate mainly to ecosystem services that support operational continuity and the implementation of investment projects, including the availability and quality of surface water and groundwater, the protective functions of ecosystems such as flood mitigation, soil erosion control and climate regulation, and, for selected assets, the availability of biomass.

These are most concentrated in our own hydrocarbon production, energy generation and infrastructure assets, where exposure is linked to asset location, land and water requirements, and the potential impact of projects and operations on ecosystem health. Additional exposure arises in the Consumers & Products segment due to the scale and geographic spread of our retail network, including sites located near protected areas.

Our opportunities are primarily linked to the development of low- and zero-carbon products and services with a lower impact on biodiversity, as well as to reducing water withdrawal through closed-loop systems and nature-based solutions.

In 2025, biodiversity was not a separate category within our Corporate Risk Management System; in practice, it was addressed in part through the environmental, climate and transition risks included in the system.

## Table 92 Double materiality assessment summary for biodiversity and ecosystems [E4.IRO-1]

| Segment | Area | Geographical region | E4<br>Risk, opportunity, impact | Impact (I)<br>Risk (R)<br>Opportunity (O) | Positive (+)<br>Negative (-) | Actual (A)<br>Potential (P) | Value chain<br>Organisation (O)<br>Downstream (D)<br>Upstream (U) |
|---|---|---|---|---|---|---|---|
| Upstream & Supply, Downstream, Energy, Consumer & Products, Corporate Functions | Refining, Upstream, Energy, Petrochemicals, Gas, Retail, Corporate Functions | Globally | **Climate change as a direct driver of biodiversity loss** | | | | |
| | | | Greenhouse gas emissions from operations affecting biodiversity and ecosystem health | I | - | A, P | O, D, U |
| | | | Development of new business segments and business lines with a portfolio of low- and zero-carbon products and services | O | | | O, D, U |
| | | | Rising costs of measures that support greenhouse gas emissions reduction, including investments in low- and zero-carbon energy sources | R | | | O, D, U |
| Upstream & Supply, Downstream, Energy, Consumers & Products | Refining, Upstream, Energy, Petrochemicals, Gas, Retail | | **Land-use change, freshwater-use change and sea-use change as direct drivers of biodiversity loss** | | | | |
| | | | Transformation of land and water in connection with operations leading to habitat loss | I | - | A, P | O, U |
| | | | Unplanned spending to mitigate negative impacts on biodiversity | R | | | O, U |
| Energy | Power Generation | Poland | **Direct exploitation as a direct driver of biodiversity loss*** | | | | |
| | | | Direct exploitation as a direct driver of biodiversity loss | I | - | A | O |
| Upstream & Supply, Downstream, Energy, Consumer & Products, Corporate Functions | Refining, Upstream, Energy, Petrochemicals, Gas, Retail, Corporate Functions | Globally | **Pollution as a direct driver of biodiversity loss** | | | | |
| | | | Pollution from operations affecting biodiversity and ecosystem health | I | - | A, P | O, D, U |
| Energy | Power Generation | Poland | **Impacts on the state of species*** | | | | |
| | | | Impact on the size of local species populations | I | - | A, P | O, D, U |
| Upstream & Supply, Downstream, Energy, Consumer & Products, Corporate Functions | Refining, Upstream, Energy, Petrochemicals, Gas, Retail, Corporate Functions | Europe | **Impacts on the extent and condition of ecosystems** | | | | |
| | | | Costs of measures to protect ecosystems and prevent land degradation | R | | | O, U |
| | | | **Impacts and dependencies on ecosystem services** | | | | |
| | | | Impacts and dependencies of the Group's operations on ecosystem services | I | - | A, P | O, D, U |
| | | | Reducing the water intensity of processes | O | | | O, D, U |
| | | | Costs of adaptation where ecosystem services are not available | R | | | O, D, U |

* Topics identified as material only for the ENERGA Group.

| | | short-term | medium-term | long-term |
|---|---|---|---|---|
| Climate change as a direct driver of biodiversity loss | R | ✓ | ✓ | ✓ |
| | O | ✓ | ✓ | ✓ |
| Land-use change, freshwater-use change and sea-use change as direct drivers of biodiversity loss | R | ✓ | ✓ | ✓ |
| Impacts on the extent and condition of ecosystems due to land degradation | R | | ✓ | ✓ |
| Impacts and dependencies on ecosystem services | O | | ✓ | ✓ |
| | R | | | ✓ |

We have conducted the double materiality assessment for biodiversity on the basis of expert knowledge, supported by the GBS®, ENCORE and WWF Biodiversity Risk Filter tools, as well as the risk and opportunity register developed by the Taskforce on Nature-related Financial Disclosures (TNFD) as part of the Biodiversity Action Plan project. Since appropriate tools are not currently available, the assessment did not take into account systemic risks.

Within the ORLEN Group, only the ENERGA Group identified local impacts on species, including impacts on the population size of individual species and direct exploitation as a direct driver of biodiversity loss. These impacts relate to small hydropower plants, whose operation may restrict the migration of migratory fish species and affect local populations of aquatic species, as well as to wind farms and power line infrastructure, where there is a risk of bird and bat collisions. The impacts are local in nature and limited to selected sites of ENERGA Group companies. Detailed information on these impacts is provided in the ENERGA Group's report.

### 6.6.1 Transition plan and consideration of biodiversity and ecosystems in strategy and business model [E4-1]

The impacts, dependencies, risks and opportunities related to biodiversity and ecosystems do not constitute a direct factor determining the ORLEN Group's business model; therefore, no resilience analysis was conducted. Nevertheless, their materiality is becoming increasingly evident, for instance because of their significant influence on the way new projects are designed and implemented and on the conditions for operating existing assets. These matters are addressed in the ORLEN Group Biodiversity Policy published in 2023, which includes commitments to preserve and promote biodiversity when developing new projects and to take measures to foster biodiversity in areas where we already operate and in their immediate vicinity.

Recognising the growing importance of the interaction between biodiversity and ecosystem protection and business activities, we have incorporated these issues as an integral part of the ORLEN Group Sustainable Development Strategy for 2025–2035, under the Environment and Biodiversity Protection pillar, which supports the long-term business objectives of the ORLEN 2035 Strategy.

The Biodiversity Transition Plan was not adopted in 2025. In 2026, we plan to adopt the ORLEN Group Biodiversity Action Plan to 2030 (BAP). It will set out the directions for managing our impacts and dependencies on nature, organise priorities, define high-level and detailed objectives, and identify initiatives that can be implemented across our multi-segment organisational structure.

**[E4.SBM-3]**

Our operations may potentially affect biodiversity and ecosystems, in particular by generating pressures through climate change, pollution and land use. These identified environmental pressures are presented in the section on the double materiality assessment.

At this stage, our impacts on biodiversity and ecosystems are identified primarily at the level of individual projects, at their planning and operational stages, on the basis of environmental impact assessment procedures, environmental decisions and other environmental regulations applicable in the countries where we operate.

Some of our assets are located in or near biodiversity-sensitive areas. The number of our sites interfacing with such locations is presented in Tables 89 and 91. While some operations may potentially affect biodiversity and ecosystems, the location of assets alone does not in itself determine the existence of a material impact. We assess potential impacts and, where appropriate data are available, actual impacts primarily at the level of specific projects and locations, taking into account environmental baseline studies, environmental impact assessment procedures, environmental decisions and other locally applicable regulatory requirements. As a result, the need to apply avoidance and mitigation measures and, where justified, also restoration or compensation measures, is identified primarily in relation to specific projects and local conditions.

Alongside the work carried out at the ORLEN Group level, key sites from the perspective of location in or near biodiversity-sensitive areas and the potential impact of our activities were also identified individually by selected Group companies, based on their own analyses, environmental baseline studies and environmental documentation. The sites are presented in the table below. This information will be further verified and possibly expanded once the assessments carried out as part of the Biodiversity Action Plan at the Group level have been completed.

As part of the implementation of the Biodiversity Action Plan, we plan a systematic assessment of all Group companies, covering both the identification of potential impacts and the verification of actual impacts at specific locations. These analyses are scheduled to begin in 2026.

## Table 93 Location in or near biodiversity-sensitive areas and measures taken by the ORLEN Group

| Company | Site | Location in or near biodiversity-sensitive areas and measures taken by the ORLEN Group |
|---|---|---|
| ORLEN S.A. | Production plant in Płock | • ORLEN S.A. production plant is located near the Vistula River valley, on the edge of the valley of Vistula tributary, the Brzeźnica River. The plant operates outside designated protected areas.<br>• The following forms of nature protection are situated within two kilometres from the site boundaries: the Brudzeński Landscape Park and the Jar Rzeki Brzeźnicy Nature and Landscape Complex.<br>• An environmental baseline study is being conducted on the site and in its immediate surroundings, with completion planned for early 2027.<br>• Biomonitoring of the Vistula River aquatic environment is conducted (autumn 2025 and spring 2026) to collect data on its biological condition in the context of the environmental effects of the commissioning of our New Chemistry project on the Vistula River system. The biomonitoring involves conducting studies before and after the project is commissioned in order to provide data and enable an analysis of the project's impacts to assess the effect on the aquatic environment of wastewater discharges to the river. |
| | Production plant in Włocławek | • The Włocławek plant site is located in, and within the 100-metre and 2-km buffers from, the Dolina Wisły–Kampinos National Park wildlife corridor. In addition, within the 2-km buffer there are Natura 2000 sites: Dolina Dolnej Wisły and Włocławska Dolina Wisły, as well as the Nizina Ciechocińska Protected Landscape Area. |
| | Service stations and fuel terminals | • For information on service stations, see disclosure E4-5 (35).<br>• Fuel terminals:<br>– Fuel terminal No. 2 Widełka – located in the Natura 2000 site Puszcza Sandomierska and within the 2-km buffer from the Mielec–Kolbuszowa–Głogów Protected Landscape Area.<br>– Fuel terminal No. 21 Sokółka – located within the 2-km buffer from the Wzgórza Sokólskie Protected Landscape Area (PL.ZIPOP.1393.OCHK.265).<br>– Fuel terminal No. 51 Lublin – located within the 2-km buffer from the Czerniejowski Protected Landscape Area.<br>– Fuel terminal No. 74 Ostrów Wielkopolski – located within the 2-km buffer from the following Natura 2000 sites: Dąbrowy Krotoszyńskie (PLB300007) and Uroczyska Płyty Krotoszyńskiej (PLH300002), as well as the Dąbrowy Krotoszyńskie Baszków–Rochy Protected Landscape Area.<br>– Fuel terminal No. 81 Kraków – located in, and within the 100-metre and 2-km buffers from, the Bielańsko–Tyniecki Landscape Park – the buffer zone of the Tenczynek Landscape Park.<br>– Fuel terminal No. 93 Nowa Sól – located within the 2-km buffer from the following Natura 2000 sites: Dolina Środkowej Odry (PLB080004) and Nowosolska Dolina Odry (PLH080014), as well as the Nowosolska Dolina Odry Protected Landscape Area.<br>– Fuel terminal No. 101 Mościska – located in, and within the 100-metre and 2-km buffers from, the buffer zone of Kampinos National Park; within the 2-km buffer from the Warsaw Protected Landscape Area, Puszcza Kampinoska, Staszek Natural Monument, the Łosiowe Błota Nature Reserve, the buffer zone of the Łosiowe Błota Nature Reserve, and the Kalinowa Łąka Nature Reserve.<br>• Apart from their location in or near biodiversity-sensitive areas, no material impacts were identified for the above locations. Our service stations and fuel terminals operate on the basis of the required environmental decisions and permits, which set out the conditions for their construction and operation. |
| ORLEN New Power | Wind and solar PV farms of 11 subsidiaries | • None of the facilities is located in an area of high natural value; there are landscape parks and Natura 2000 sites situated within a distance of approximately 2–7 km.<br>• Post-construction monitoring: ornithological and chiropterological monitoring is carried out in accordance with the environmental decisions.<br>• No sites are located in or near biodiversity-sensitive areas. Monitoring is conducted as required under the environmental decisions, which minimises the risk of disturbance to species. |
| ORLEN Aviation | Aviation fuel storage and refuelling services within or adjacent to airport areas (transformed land) | • No sites with a material impact on sensitive areas were identified.<br>• Following an incident in Pyrzowice in 2024, soil remediation measures are being carried out. |
| ORLEN Budonaft | Office building, production floor, paint shop in Limanowa | • The nearest protected areas are:<br>– Południowomałopolski Protected Landscape Area, approximately 0.5 km away,<br>– Natura 2000 site Łososina (PLH120087), approximately 1.5 km away,<br>– Natura 2000 site Ostoje Nietoperzy Beskidu Wyspowego (PLH120052), approximately 1.5 km away.<br>• The company' operations do not result in deterioration of habitats or disturbance of species; therefore, no need to implement mitigation measures was identified. |
| ORLEN Neptun | Świnoujście Offshore Terminal | • Natura 2000 sites located within a buffer of up to approximately 2 km:<br>– Świna Delta Special Area of Conservation (PLB320002),<br>– Wolin and Uznam Special Area of Conservation (PLH320019).<br>• No sites located in a protected area were identified.<br>• Potential indirect impacts were identified, for example, disturbance of birds and the impact of hydrotechnical works.<br>• Provided that the conditions set out in the environmental decisions are complied with, there are no significant negative impacts on the conservation objectives of the Natura 2000 sites.<br>• The mitigation measures applied include:<br>– timing restrictions on works (for example, tree felling outside the bird breeding season; dredging works outside periods sensitive for ichthyofauna);<br>– limiting interference with habitats (for example, timing restrictions for reed beds);<br>– compensatory measures for birds (nest boxes/platforms);<br>– ecological supervision; HSE/Environment controls. |
| ORLEN Termika S.A. | Żerań CHP plant and decommissioned Myśliborska combustion waste landfill,<br>Siekierki CHP plant and decommissioned Zawady combustion waste landfill, | • Żerań CHP plant: adjacent to the Vistula River (water withdrawal / discharge of cooling water and wastewater); Natura 2000 site Dolina Środkowej Wisły (PLB140004); the adjoining section is covered by the Warsaw Protected Landscape Area (PL.ZIPOP.1393.OCHK.619).<br>• Siekierki CHP plant: adjacent to the Vistula River – Natura 2000 (PLB140004), Special Protection Area; borders the buffer zones of: the Jeziorko Czerniakowskie Nature Reserve (PL.ZIPOP.1393.RP.502), the Morysin Nature Reserve (PL.ZIPOP.1393.RP.655), and the Warsaw Protected Landscape Area (PL.ZIPOP.1393.OCHK.619).<br>• Pruszków CHP plant: adjacent to the Utrata River (stormwater discharge); the Warsaw Protected Landscape Area (PL.ZIPOP.1393.OCHK.619). |

| Company | Site | Location in or near biodiversity-sensitive areas and measures taken by the ORLEN Group |
|---|---|---|
| | Pruszków CHP plant,<br>Kawęczyn heat plant,<br>Wola heat plant | • Degradation/desertification/sealing: no material negative impacts were identified.<br>• Threatened species: a potential impact from discharges to rivers was identified, but not confirmed.<br>• The company's operations do not result in deterioration of habitats. Potential risks (discharge of industrial wastewater and cooling water) not confirmed with documentation. No negative impacts identified in documents prepared for capital projects (Environmental Impact Assessment Report, Project Information Sheet).<br>• Measures taken include compensation in connection with investment projects and tree felling (for example, replacement planting) as required by environmental decisions. |
| Polska Spółka Gazownictwa | Construction of the DN150, MOP 6.3 MPa high-pressure gas distribution pipeline as part of the project to construct the Otmuchów–Paczków section the Lewin Brzeski–Paczków high-pressure gas pipeline; location: municipalities of Otmuchów and Paczków, Province of Opole | • Sensitive areas and site conditions:<br>– the Nysa Protected Landscape Area (the route runs almost entirely within the boundaries of the area);<br>– Natura 2000 site Zbiornik Nyski (partly in the area of the crossing of the Nysa Kłodzka River);<br>– Dolina Nysy Kłodzkiej wildlife corridor in the distance of approximately 1.4 km;<br>– Natura 2000 site Zbiornik Otmuchowski (special protection area).<br>• An environmental baseline study was completed, with fieldwork covering full phenological seasons for fauna and full vegetation seasons for flora.<br>• With the conditions set out in the environmental decision complied with (including trenchless construction), no material negative impacts on sensitive areas were identified during the construction, operation or decommissioning stages.<br>• Risks identified at the construction/decommissioning stage: damage to the root systems and bark of trees and shrubs; incidental animal mortality; noise; waste; tree felling; contamination of soil and water environment; emissions from machinery and vehicles. |
| | Other locations | • No analysis of site location in relation to biodiversity-sensitive areas was carried out; no environmental baseline study was conducted for own sites.<br>• Projects (gas pipelines) constructed in accordance with the conditions set out in the environmental decisions. No significant negative impacts on sensitive areas were identified for the construction stage (using trenchless methods), operation or decommissioning.<br>• The mitigation measures applied include:<br>– noise: temporary screens/earth bunds;<br>– amphibians: works carried out under the supervision of a herpetologist (near watercourses and habitats identified in environmental baseline studies);<br>– protected plants (for example, wild garlic): protective measures/fencing under the supervision of a botanist;<br>– birds: tree felling carried out between 16 October and the end of February, or under the supervision of an ornithologist;<br>– bats: felling of trees with cavities or bark carried out under the supervision of a chiropterologist. During the active season (April–October), night works are avoided or, where night works are necessary, directional LED lighting (downward beam) is used. |
| ORLEN Południe | Trzebinia plant<br>Jedlicze plant<br>Kętrzyn rapeseed oil pressing plant (under construction) | • Biodiversity-sensitive areas:<br>– Natura 2000 site Jasiołka (PLH180011), adjacent to the Jedlicze plant;<br>– Dolina Rzeki Guber Protected Landscape Area (the Kętrzyn plant – once commissioned).<br>• A minor impact was identified, namely surface water withdrawal, which is carried out in strict compliance with water permits (discharge parameters in accordance with the integrated permit, and stormwater/snowmelt discharges in accordance with water permits).<br>• Mitigation measures (19b): no need for mitigation measures was identified (operations are conducted in compliance with the permits). |
| PGNiG Branch Complex | Five investment projects | • Projects carried out in 2025 (located in Natura 2000 sites/parks):<br>– Expansion of the Wierzchowice underground storage facility to 2.1 billion Nm³ – Ostoja nad Baryczą (PLH020041), Dolina Baryczy (PLB020001), Dolina Baryczy Landscape Park;<br>– Development of the Różańsko field and a cogeneration source for the Dębno oil and gas production facility – Ostoja Witnicko-Dębniańska (PLB320015);<br>– Expansion of the gas compression unit at the Bogdaj–Uciechów–Czeszów gas production facility – Ostoja nad Baryczą (PLH020041), Dolina Baryczy (PLB020001);<br>– Expansion of the Lubiatów (Międzychód) oil and gas production facility – Puszcza Notecka (PLB300015), H Międzychód Protected Landscape Area;<br>– Development of the Ołaczewo 1 well – Lasy Żerkowsko-Czeszewskie (PLH300053), Dolina Środkowej Warty (PLB300002), Żerkowsko-Czeszewski Landscape Park.<br>• Environmental decisions were obtained for the above projects; no need to carry out a full environmental impact assessment was identified. No additional measures were required beyond the conditions set out in the decisions. |
| ANWIL S.A. | Włocławek plant | • Area adjacent to the Natura 2000 sites Włocławska Dolina Wisły (PLH040039) and Dolina Dolnej Wisły (PLB040003).<br>• In the vicinity (≤15 km): Kulin Nature Reserve, Dębice Nature Reserve, Prof. K. Kępczyński Bór Wąkole Nature Reserve, Gostynińsko-Włocławski Landscape Park, Nizina Ciechocińska Protected Landscape Area.<br>• No negative impacts were identified. |
| Rafineria Gdańska | Rafineria Gdańska | • Location: outside sensitive areas; fully transformed land (ruderal site).<br>• The nearest protected areas are:<br>– within a distance of approximately 800 m – the Natura 2000 site Ostoja w Ujściu Wisły (PLH220044);<br>– within a distance of approximately 2 km – Ujście Wisły Special Protection Area (PLB220004) and Ptasi Raj Nature Reserve.<br>• No material impacts were identified (the conclusions are based on the characteristics of the site and the known natural environment in its vicinity). |

**Public consultations on biodiversity**

In the case of projects likely to have a significant impact on the environment, local communities are involved in public consultations as part of the administrative environmental impact assessment procedures. The consultation process includes public notices and announcements published in the Public Information Bulletin (BIP), meetings, and the collection of feedback and objections through the relevant Municipal Offices in the areas where the projects are located.

In addition to complying with these formal requirements, in 2025 we undertook further community dialogue activities. For instance, in connection with the New Chemistry project such initiatives included:

- a dedicated contact form available on the project's website for submitting questions and complaints regarding the project; questions and complaints can also be sent by post;
- publication of two reports on the project's website: the Stakeholder Engagement Plan for the New Chemistry Project and the Human Rights Impact Assessment;
- official stock exchange announcements, including announcement of the New Strategy ORLEN 2035 Regarding the New Chemistry Project and Results for Q1 2025 – communication of progress on the New Chemistry project, as well as related press conferences;
- ongoing communication in local media and on social media;
- implementation of the ORLEN as a Good Neighbour project promoting local initiatives in the municipality of Stara Biała.

### 6.6.2 Policies related to biodiversity and ecosystems [E4-2]

#### Biodiversity and ecosystem policies adopted by the ORLEN Group and material biodiversity- and ecosystem-related topics

The ORLEN Group Biodiversity Policy is the key document setting the framework for the management of biodiversity- and ecosystem-related matters across the Group.

It outlines the main commitments, principles and directions adopted by Group companies in response to identified environmental impacts, supporting the gradual integration of biodiversity protection into our operating and investment activities. The Policy was developed in connection with the double materiality assessment, which included stakeholder dialogue. Furthermore, the Policy requires Group companies, at various operational levels, to review the biodiversity conservation measures already in place and to plan and implement further improvement initiatives, particularly in areas that are environmentally sensitive or demonstrate high natural value.

The Climate and Sustainability Council is the most senior body accountable for the implementation of the Policy. The document was developed with reference to the EU Biodiversity Strategy for 2030, the EU Taxonomy and the Sustainable Development Goals of the 2030 Agenda.

The overarching objectives set out in the ORLEN Group Biodiversity Policy are to:

- preserve and promote biodiversity by establishing new projects to enable sustainable coexistence with, preservation and conservation of, and support for natural heritage,
- take measures to foster biodiversity in and adjacent to the existing operation sites,
- foster a societal culture of biodiversity protection focused on raising stakeholder awareness.

In addition, the Biodiversity Policy provides for the following:

- integrating biodiversity protection into the ORLEN Group's internal strategic and decision-making processes;
- incorporating biodiversity into the list of environmental aspects analysed within the operated environmental management systems;
- applying the mitigation hierarchy: avoidance, minimisation, restoration and compensation at all stages of strategic infrastructure projects in order to minimise the impact of new infrastructure on biodiversity;
- avoiding the siting of new infrastructure projects in protected areas, thereby preserving their natural value;
- compensating for the ORLEN Group's operational impacts through remediation and restoration of ecosystems, as well as additional biodiversity-supporting measures;
- protecting species and natural habitats through proactive conservation management, actions for their benefit, research on species distribution, and, where necessary, assessment of ecosystem services in cooperation with external experts;
- implementing nature-based solutions, including with the use of digital tools;
- raising awareness, providing training and engaging ORLEN Group employees and partner entities in biodiversity initiatives;
- participating in research, educational and awareness-raising projects in cooperation with government agencies, non-governmental organisations, local communities and other stakeholders;
- regularly communicating the ORLEN Group's biodiversity-related actions (information on protected areas, and research, conservation and environmental education activities, etc.), and publishing periodic biodiversity reports.

The ORLEN Group Biodiversity Policy is available at www.orlen.pl.

The ORLEN Group Biodiversity Policy serves as the overarching framework at Group level. It is implemented by Group companies, in particular through environmental and QHSE management systems, investment procedures, and compliance with administrative decisions, with each company adapting its implementation to its business profile, the characteristics of its assets, and the scale of its potential impacts on biodiversity. The companies listed below supplement the Policy with additional measures, documents and procedures, and have decided to provide more detailed disclosures in this respect.

- Actions taken at **ORLEN Neptun**, which develops strategic infrastructure and investment projects, included incorporating environmental requirements into contracts with survey contractors, verifying compliance with environmental decision conditions during project implementation, and applying mitigation and biodiversity compensation measures for protected species, under the oversight of dedicated environmental and HSE teams.
- At **Geofizyka Toruń S.A.**, providing seismic and geophysical services, biodiversity impact management is based on an integrated Environmental Policy and QHSE procedures, with a particular emphasis on ensuring compliance with environmental decisions and environmental impact assessments, the use of technologies and equipment that minimise environmental pressure, and training and awareness-raising for employees and contractors.
- At **ORLEN Upstream Polska S.A.**, which is responsible for oil and gas production operations, internal QHSE policies and regulations, together with the ORLEN Group Environmental Protection Policy, define principles for identifying environmental risks, ensuring regulatory compliance, and integrating biodiversity considerations into operational planning and execution.
- At companies that do not have separate biodiversity policies, such as **ORLEN Termika S.A.**, biodiversity considerations have been embedded in their environmental policies implemented through environmental management systems (such as ISO 14001). The policies include commitments to reduce negative impacts on biodiversity and support its protection, in line with the ORLEN Group Biodiversity Policy.
- At **IKS Solino**, environmental management, including biodiversity-related aspects, is carried out under the Integrated Management System Policy. The company identifies regulatory, legal, technological, reputational and market risks linked to the location and characteristics of its operations, while also recognising environmental management as a source of opportunities, including the adoption of new practices and technologies, market development and partnership building.
- At **Polska Spółka Gazownictwa**, an Environmental Protection Policy implemented in 2025 sets out objectives related to biodiversity protection and enhancement, particularly in capital investment projects, with a dedicated biodiversity policy planned for implementation in 2026.

The Biodiversity Policy is currently being revised to clarify the principles and directions of the ORLEN Group's actions so that they better address the identified biodiversity challenges and reflect the operational profiles of individual companies. The updated Policy is expected to be published in 2026.

### Related policies

Matters related to sustainable development and environmental protection involving seas and oceans are governed by international conventions, sector agreements, and contractual arrangements. Relevant provisions are incorporated into our vessel lease contracts, with compliance responsibilities assigned to the shipowner.

However, issues related to biodiversity and ecosystem-related impacts in the value chain are addressed in the ORLEN Group Supplier Code of Conduct.

We have not adopted a dedicated policy covering production, sourcing or consumption from ecosystems that are managed to maintain or enhance conditions for biodiversity.

The topics referred to deforestation, agriculture sea and oceans were immaterial in the double materiality analysis for 2025 therefore the Group does not have policies dedicated to these topics. A list of material topics for E4 is available in Table E4.IRO-1.

## 6.6.3 Actions and resources related to biodiversity and ecosystems [E4-3]

Our actions in the area of biodiversity and ecosystems are carried out in alignment with the ORLEN Group Biodiversity Policy, and focus primarily on identified material impacts and the related risks and opportunities. In particular, they include operational, protective, preventive, mitigation and restoration measures, supplemented by educational, research and grant initiatives supporting nature conservation and the development of environmental awareness.

No material standalone initiatives were identified in relation to biodiversity and ecosystems that would necessitate the disclosure of significant, separately allocated capital expenditure (CAPEX) or operating expenditure (OPEX). As a rule, resources allocated to these actions are included in spending as part of operating or investing activities of the respective Group companies and, depending on the nature of the initiatives undertaken, under grant programmes and foundation initiatives.

Actions related to biodiversity and ecosystems are implemented using mainly organisational, technical and financial resources embedded in operating and investment processes.

As part of the implementation of the Biodiversity Action Plan, we plan to propose specific initiatives addressing the MDR-A requirements.

## Selected actions implemented in 2025 in accordance with the mitigation hierarchy

In 2025, ORLEN Group companies implemented measures aimed at reducing impacts on biodiversity in line with the mitigation hierarchy, namely through avoidance, minimisation, restoration/reclamation/remediation and, where required by administrative decisions or regulations, also through biodiversity compensation. The scope and nature of these actions were tailored to the business profiles of individual companies, the project stage and environmental conditions.

In the area of avoidance and minimisation of impacts, our actions focused primarily on appropriate investment planning, applying work methods reducing pressure on habitats and species, and implementing technical solutions mitigating the risk of impacts.

- **ORLEN S.A.** applied the mitigation hierarchy in infrastructure projects wherever this was required by the environmental decisions, as well as in management plans for the New Chemistry project at the construction stage. In accordance with the Environmental Management Plan, contractors applied avoidance and minimisation measures, including limiting land take, carrying out works outside the bird breeding season, reducing noise and dust emissions, ensuring proper waste management, protecting soil and water, and securing excavations to protect fauna.
- **ORLEN New Power** implemented avoidance- and minimisation-level measures in its wind farm and solar PV projects. Renewable energy sources constructed by the company are an alternative to high-carbon power generation assets. At solar PV farms, solutions were used to enable the safe movement of small animals under fencing. During the operational phase, vegetation mowing was carried out outside the bird breeding season, and during the breeding season only under the supervision of an ornithologist. Bird and bat monitoring was conducted at wind farms, and selected sites used Bioseco bird detection systems to help reduce collision risk through light and sound signals.
- At the design stage of its projects, **ORLEN Neptun** implemented measures appropriate to the project development phase, such as incorporating environmental requirements into contracts with survey contractors, requiring the identification of environmental impact mitigation measures and their approval by HSE/environmental functions, as well as implementing and verifying compliance with environmental decision conditions. Oversight of these measures was exercised by HSE/Environment teams.
- **Geofizyka Toruń S.A.** operated in accordance with environmental impact assessments and environmental baseline studies, using low-ground-pressure equipment, precise route planning and supervision by QHSE teams. The company has indicated that its activities are temporary in nature and do not result in permanent biodiversity loss; therefore, its measures focused on avoiding and minimising impacts.

Our restoration, reclamation and remediation actions consisted in restoring the natural or functional value of areas that have been temporarily or locally transformed.

- Following the completion of drilling operations, **ORLEN Upstream Polska** routinely restores temporarily occupied land so that it can be returned to agricultural use. This includes dismantling infrastructure, restoring landform, spreading topsoil, and applying agrotechnical treatments such as cultivation, harrowing, fertilisation and seeding. Completion of restoration is in each case confirmed by a decision of the competent county governor.
- **ORLEN Aviation** continued remediation measures related to a 2024 incident on its Katowice site, which resulted in local soil contamination over an area of approximately 30 m² outside an area of high biodiversity value. In the first stage, in situ remediation was applied, with the option of moving to ex situ remediation if the required outcomes were not achieved.
- **ORLEN Termika S.A.**'s actions included both minimisation and restoration elements, such as replacement planting, land remediation and conducting environmental baseline studies of its sites. The company also prepared an assessment of the impacts of water withdrawal and discharge on the ichthyofauna of the Vistula River and its tributaries, together with a plan of preventive and compensation measures.

As regards compensation and offsetting measures, we implemented actions in accordance with the formal and legal conditions, in particular where they resulted from administrative decisions or regulatory requirements.

Another important category of actions was active conservation measures and the restoration of ecosystem functions:

- **ORLEN S.A.** organised conservation activities in the coastal salt marsh ecosystem within Wolin National Park and in Natura 2000 sites: Delta Świny and Wolin and Uznam. The activities included mowing salt meadows and removing biomass across 110 hectares, in addition to extensive grazing. The works were conducted outside the bird breeding season and in line with Park guidelines to limit vegetation succession and preserve suitable conditions for protected species. Costs incurred in 2025 amounted to PLN 150,000 thousand, VAT exclusive.
- The **Energa Group** undertook a range of actions to support biodiversity, including monitoring of avifauna and ichthyofauna, fish restocking, landfill restoration, tree planting, sowing of flower meadows, as well as training and local environmental initiatives. The company was not subject to

formal biodiversity compensation obligations. **Energa Wytwarzanie** has for many years invested in the construction of fish passes at hydropower plants. Currently, 13 small hydropower plants are equipped with fish passes: Drzeżewo, Borowo, Wojdyty, Kotowo, Łyna, Brąswałd, Braniewo, Rakowiec, Rościno, Smołdzino, Biesowice and Skarszów Dolny. Most recently, a fish pass was constructed at the Skarszów Dolny small hydropower plant on the Skotawa River, in the buffer zone of the Dolina Słupi Landscape Park. The facility was commissioned in 2024. Due to the costs involved, the company intends to seek external funding. In 2014–2025, PLN 1,312,915.55 was allocated to fish stocking, including PLN 143,739.50, VAT exclusive, in 2025. The species stocked included brown trout fry, sea trout and eel. The company cooperates with external partners, for instance with the Inland Fisheries Institute on eel monitoring and with organisations in the Parsęta river basin on the capture and restitution of migratory fish.

Actions implemented in 2025 indicate that we focused primarily on preventing and reducing impacts at source, and then, where necessary, on restoration, reclamation or remediation. Compensation was used as a supporting measure where required under decisions of the competent authorities or applicable regulations. We did not undertake any biodiversity offsetting activities.

### Selected educational and grant initiatives implemented by the ORLEN Foundations in 2025

- The ORLEN Foundation for Pomerania awarded nearly PLN 4 million to nine beneficiaries under the first edition of the Vistula Biodiversity Grant programme. Grants of up to PLN 500,000 supported initiatives protecting valuable ecosystems of the Vistula River and its tributaries. The programme was open to NGOs, research institutions, schools and local authorities.
- The ORLEN Foundation for Pomerania transferred PLN 4 million to ten beneficiaries under the first edition of the Baltic Biodiversity Grant programme. Grants of up to PLN 500,000 per project financed initiatives protecting biodiversity in coastal and marine areas of the Baltic Sea. Eligible participants included NGOs, research institutions, schools, local governments, associations, foundations and community organisations.
- The ORLEN Foundation has initiated a three-year partnership with UNEP/GRID Warsaw to support the Birds of Prey Conservation Programme in Poland, covering five raptor species: the golden eagle, white-tailed eagle, lesser spotted eagle, osprey and peregrine falcon. The programme includes population monitoring, release of young birds, installation of telemetry transmitters, and extensive educational and research activities, covering up to 90% of the national populations of certain species.
- Antarctica under ORLEN's Wing is a research and education initiative aiming to establish a new Antarctic Specially Protected Area. Currently, strictly protected areas account for only 0.02% of the region. Initiated in 2025, the project is intended to lead to the designation of an additional protected area, increasing the extent of protected zones and strengthening Poland's international position in Antarctic research. It is a joint initiative of ORLEN S.A., the ORLEN Foundation and the Institute of Biochemistry and Biophysics of the Polish Academy of Sciences.
- Following a PLN 3.5 million donation from the ORLEN Foundation and the execution of a notarial deed, the area of Magura National Park was expanded by 50 hectares, supporting the protection of the golden eagle, one of Poland's rarest birds of prey.
- The ORLEN Foundation for Pomerania awarded 38 grants, totalling approximately PLN 3.3 million, under the Climate Adaptation for Northern Poland programme. The initiatives that benefitted from the Foundation's financing included measures fostering biodiversity, such as the creation of a pocket forest in Łeba and educational projects on water management in the Żuławy area, supporting the protection of local ecosystems and enhancing their resilience to climate change.

## 6.6.4 Targets related to biodiversity and ecosystems [E4-4]

In 2025 the Group has not set any measurable quantitative objectives connected with biodiversity and ecosystems. The ORLEN Group ambitions relating to biodiversity and ecosystems are set out in the Biodiversity Policy and in the ORLEN Group Sustainable Development Strategy for 2025–2035. The ambitions were developed on the basis of the EU Biodiversity Strategy for 2030, the EU Taxonomy, and the UN Sustainable Development Goals and cover planning of new projects, as well as existing operations and immediate surroundings. Once the Biodiversity Action Plan (BAP) is implemented, the Group plans to prepare specific initiatives for Group companies. Ambitions related to biodiversity and ecosystems have been defined in the Sustainable Development Strategy, under which we have established the following milestones:

by 2026 – development of the Biodiversity Action Plan (BAP) for the ORLEN Group, including:
- calculation of ORLEN S.A.'s biodiversity footprint,
- integration of biodiversity protection into the ORLEN Group's internal strategic decision-making processes;

by 2030 – implementation of BAP across the ORLEN Group:
- further action to halt biodiversity loss and compensate for the ORLEN Group's biodiversity impacts;
- avoidance of siting of new projects within areas covered by special protection measures.

by 2050 – achievement of a net-positive biodiversity impact for new assets.

These targets are supported by the principles set out in our Biodiversity Policy, in particular by integrating biodiversity protection into decision-making processes, applying the mitigation hierarchy, and pursuing actions to support biodiversity in areas where we operate. Some of the targets are currently high-level and implementation-oriented, with further operationalisation, including the development of metrics, baselines and progress monitoring, planned as part of the preparation and implementation of the Biodiversity Action Plan.

### Targets at the level of ORLEN Group companies

In 2025, **Polska Spółka Gazownictwa** (PSG) developed and implemented the PSG Environmental Protection Policy, under which it established the objective of protecting and enhancing biodiversity. This objective will be pursued from 2026 onwards across the company's area of operations. At this stage, it has not yet been based on environmental thresholds, but it remains aligned with the directions set by the EU Biodiversity Strategy for 2030.

**IKS Solino** adopted an objective of prioritising biodiversity protection at all levels of its operations and investments. This includes integrating biodiversity considerations into the project lifecycle and the supply chain, ongoing monitoring of investments, and raising employee awareness.

**ORLEN Neptun** did not set separate quantitative biodiversity targets in 2025. The company intends to develop measurable targets when the Baltic East and Baltic West projects move into construction and operational phases and environmental monitoring is launched.

Under the 2025 Environmental Objectives approved by its Management Board, **ORLEN Termika S.A.** intends to assess biodiversity on its sites and to develop biodiversity action plans by 2030. This objective will be delivered through a range of actions including environmental baseline studies, assessment of impacts on ichthyofauna, and preparation of an action plan.

Other Group companies did not identify any additional targets related to biodiversity and ecosystems.

## 6.6.5 Impact metrics related to biodiversity and ecosystems change [E4-5]

### Locations in or near biodiversity-sensitive areas

Scope of assets: the analysis covered only active ORLEN Group facilities located in Poland; decommissioned assets and those at the pre-operational stage were excluded. Source of geospatial data on protected areas: public geospatial data from the General Directorate for Environmental Protection (GDOŚ) (Central Register of Forms of Nature Protection, data as at 6 May 2025). For sites located near biodiversity-sensitive areas (with proximity calculated from the asset boundary), 100 m and 2 km buffers were applied. Where the same protected area interfaced with more than one asset, it was counted only once in the lists (as a single location). Interfacing with locations near biodiversity-sensitive areas identifies the potential range of impact (proximity pressure) calculated from the asset and does not in itself mean that a negative impact on habitats or species has been identified.

Table 94 Number of ORLEN Group assets interfacing with locations in or within biodiversity-sensitive areas, excluding service stations, in 2025

| Category of protected area | Sites interfacing with locations in biodiversity-sensitive areas | Sites interfacing with locations near biodiversity-sensitive area | |
|---|---|---|---|
| | | 100 m buffer | 2,000 m buffer |
| Wildlife corridors | 43 | 46 | 111 |
| Protected landscape areas | 45 | 56 | 141 |
| Natura 2000 Special Protection Areas | 21 | 27 | 64 |
| Landscape parks | 25 | 26 | 55 |
| National parks | 3 | 5 | 9 |
| Ramsar areas | 0 | 1 | 5 |
| Nature reserves | 1 | 4 | 73 |
| Natura 2000 Special Areas of Conservation | 26 | 32 | 150 |
| Documentation sites | 0 | 0 | 64 |
| Ecological sites | 1 | 5 | 198 |
| Nature and landscape complexes | 2 | 2 | 39 |

Table 95 Total area of interfacing sites by type of location: location in/near biodiversity-sensitive area [ha]

| Category of protected area | Area of sites interfacing with locations in biodiversity-sensitive areas | Area of sites interfacing with locations near biodiversity-sensitive areas | |
|---|---|---|---|
| | | 100 m buffer | 2,000 m buffer |
| Wildlife corridors | 407.69 | 849.36 | 101,093.36 |
| Protected landscape areas | 71.53 | 635.98 | 101,324.51 |
| Natura 2000 Special Protection Areas | 93.47 | 422.25 | 58,511.26 |
| Landscape parks | 140.49 | 641.1 | 67,592.90 |
| National parks | 16.45 | 49.4 | 8,501.21 |
| Ramsar areas | - | 0.66 | 1,786.77 |
| Nature reserves | 0.27 | 12.65 | 2,982.02 |
| Natura 2000 Special Areas of Conservation | 29.99 | 247.19 | 48,494.05 |
| Documentation sites | - | - | 7.8 |
| Ecological sites | 0.00 | 5.97 | 1,670.52 |
| Nature and landscape complexes | 0.44 | 9.78 | 4,311.72 |
| **Total** | **760.33** | **2,874.34** | **396,276.12** |

Table 96 Number of CODO service stations selected for analysis in 2025 interfacing with locations in or within biodiversity-sensitive areas

| Category of protected area | Sites interfacing with locations in biodiversity-sensitive areas | Sites interfacing with locations near biodiversity-sensitive area | |
|---|---|---|---|
| | | 100 m buffer | 2,000 m buffer |
| Wildlife corridors | 49 | 52 | 108 |
| Protected landscape areas | 71 | 88 | 123 |
| Natura 2000 Special Protection Areas | 21 | 35 | 68 |
| Landscape parks | 58 | 69 | 79 |
| National parks | 7 | 9 | 12 |
| Ramsar areas | 0 | 0 | 4 |
| Nature reserves | 0 | 2 | 53 |
| Natura 2000 Special Areas of Conservation | 12 | 38 | 135 |
| Documentation sites | 0 | 0 | 5 |
| Ecological sites | 0 | 2 | 82 |
| Nature and landscape complexes | 1 | 4 | 18 |

Table 97 Total area of interfacing sites by type of location: location in/near biodiversity-sensitive area [ha]

| Category of protected area | Area of sites interfacing with locations in biodiversity-sensitive areas | Area of sites interfacing with locations near biodiversity-sensitive areas | |
|---|---|---|---|
| | | 100 m buffer | 2,000 m buffer |
| Wildlife corridors | 224.00 | 582.89 | 99,848.69 |
| Protected landscape areas | 92.20 | 712.52 | 133,717.44 |
| Natura 2000 Special Protection Areas | 123.54 | 246.96 | 64,546.00 |
| Landscape parks | 70.74 | 637.98 | 124,577.34 |
| National parks | 6.02 | 70.68 | 14,949.91 |
| Ramsar areas | - | - | 542.48 |
| Nature reserves | - | 1.11 | 2,273.23 |
| Natura 2000 Special Areas of Conservation | 7.23 | 106.41 | 46,513.25 |
| Documentation sites | - | - | 12.87 |
| Ecological sites | - | 0.75 | 461.62 |
| Nature and landscape complexes | 0.90 | 9.03 | 2,014.98 |
| **Total** | **524.63** | **2,368.33** | **489,457.81** |

## Land use information

This section presents area-based metrics illustrating the impact of our operations on land use and land condition in areas under ORLEN Group's management. The metrics cover sealed areas, biologically active areas, areas transformed during the reporting year and degraded areas. A description of the types of degradation is also provided, where it has been specified by Group companies.

Table 98 Results (aggregated values for the ORLEN Group)

| Category | Area (ha) |
|---|---|
| Area under management | 39,369.53 |
| Sealed area | 22,053.86 |
| Biologically active area | 12,722.02 |
| Area transformed in the reporting year | 21.27 |
| Degraded area | 235.99 |
| Type of degradation [open-pit mining / contamination / landfill] [only if an area is reported under category 4] | Energa Group – landfill;<br>ORLEN Aviation, ORLEN Oil, ORLEN Paliwa – contamination;<br>ORLEN Upstream Polska – well mining;<br>ORLEN Południe – includes the area of the open pit, heavily contaminated and polluted land, storage sites for solid waste, liquid waste, and mining overburden, and similar areas requiring reclamation. |

As a TNFD Adopter, ORLEN S.A. has committed to implementing the TNFD recommendations and including TNFD's recommended disclosures in its non-financial reporting. The concordance table below shows how the individual TNFD recommendations have been reflected in this Sustainability Statement, with cross-references to the relevant ESRS components.

## Table 99 Concordance table mapping ESRSs to TNFD recommendations

| TNFD's recommended disclosure | ESRS disclosure | Section of this Sustainability Statement |
|---|---|---|
| Governance A | ESRS 2 GOV-1, GOV-2, GOV-3, GOV-5 | 1.1.3, 1.1.4, 1.1.5., 1.1.7. |
| Governance B | ESRS 2 GOV-1, GOV-2, IRO-1, MDR-P | 1.1.3., 1.1.4, 1.1.5., 1.1.7., 1.1.12. |
| Governance C | ESRS E4-1,17e | 1.6.1. |
| Strategy A | ESRS E4-1, 16a | 1.6.1. |
| Strategy B | ESRS E4-2 20, 23d, ESRS E4-3 25, 28a, ESRS E4-4 32 | 1.6.2., 1.6.3., 1.6.4. |
| Strategy C | ESRS E4-1 13 | 1.6.1. |
| Strategy D | ESRS E4-1, 16a, 17, 19 | 1.6.1. |
| Risk and impact management A(i) | ESRS E4-1, 17ab | 1.6.1. |
| Risk and impact management A(II) | ESRS E4-1, 17ab | 1.6.1. |
| Risk and impact management B | ESRS E4-2 20 | 1.6.2. |
| Risk and impact management C | ESRS 2 IRO-1 | 1.1.12. |
| Metrics and targets A | ESRS E4-5 35, 38 | |
| Metrics and targets B | | 1.6.5. |
| Metrics and targets C | | |

## 6.7 Resource use and circular economy [ESRS E5]

Table 100 Summary of the double materiality assessment [E5.IRO-1]

| Segment | Area | Geographical region | E5<br>Risk, opportunity, impact | Impact (I)<br>Risk (R)<br>Opportunity (O) | Positive (+)<br>Negative (-) | Actual (A)<br>Potential (P) | Value chain<br>Organisation (O)<br>Downstream (D)<br>Upstream (U) |
|---|---|---|---|---|---|---|---|
| Upstream & Supply, Downstream, Energy, Consumers & Products | Refining, Upstream, Energy, Petrochemicals, Gas, Retail | Europe | Resource inflows, including resource use | | | | |
| | | | Use of non-renewable raw materials (including hydrocarbons) | I | - | A, P | O, U |
| | | | Exposure to resource shortages and, as a result, to high or volatile resource prices | R | | | O, U |
| | | | Support for initiatives to integrate renewable raw materials and circular solutions into operations | I | + | A, P | O, U, D |
| | | | Limited use of renewable and sustainable raw materials | I | - | P | O, U, D |
| | | | High financial costs and technical/operational constraints when implementing new circular economy solutions | R | | | O, U, D |
| | | | Development of partnerships with suppliers of sustainable feedstocks to secure long-term access | O | | | O, U, D |
| | | | Resource use optimisation and industrial symbiosis | O | | | O, U, D |
| | | | Increased competitiveness | O | | | O, U, D |
| | | | Improved project bankability/ access to finance through applying circular economy principles | O | | | O, U, D |
| | | | Resource outflows related to products and services | | | | |
| | | | Supply of non-circular products to the market | I | - | A, P | O, D |
| | | | Emergence of new revenue streams and innovative business models | O | | | O, D |
| | | | Costs of compliance with regulatory changes | R | | | O, D |
| | | | Developing the renewable energy source portfolio, producing biocomponents and circular products, and integrating circular solutions into operations | I | + | P | O, U, D |
| Upstream & Supply, Downstream, Energy, Consumer & Products, Corporate Functions | Refining, Upstream, Energy, Petrochemicals, Gas, Retail, Corporate Functions | | Waste | | | | |
| | | | Generation of hazardous and non-hazardous waste | I | - | P, A | O, U, D |
| | | | Costs of non-compliance with regulatory changes | R | | | O, U, D |
| | | | Non-compliance with the conditions of applicable decisions and permits and with legal requirements | R | | | O, U, D |
| | | | More efficient use of environmental resources | O | | | O, U, D |
| | | | Reducing operating costs through circular economy measures – effective waste management | O | | | O, U, D |

| | | short-term | medium-term | long-term |
|---|---|---|---|---|
| Resource inflows, including resource use | R | ✓ | ✓ | ✓ |
| | R | ✓ | ✓ | ✓ |
| | O | | ✓ | ✓ |
| | O | | ✓ | ✓ |
| | O | | ✓ | ✓ |
| | O | ✓ | ✓ | ✓ |
| Resource outflows related to products and services | O | | ✓ | ✓ |
| | R | ✓ | ✓ | ✓ |
| Waste | R | ✓ | ✓ | ✓ |
| | R | | | ✓ |
| | O | ✓ | ✓ | ✓ |
| | O | ✓ | ✓ | ✓ |

### 6.7.1 Policies related to resource use and circular economy [E5-1]

#### ORLEN Group Circular Economy Policy

The Circular Economy Policy was developed and approved in 2025 by the President of the ORLEN S.A. Management Board and published on our internal corporate platforms. Its purpose is to support our transition towards a low-carbon and resource-efficient economy, in line with the direction set out in our strategic documents, namely the ORLEN 2035 Strategy, the ORLEN Group Sustainable Development Strategy for 2025–2035, and the ORLEN Transition Plan (available on www.orlen.pl).

The Circular Economy Policy sets out development priorities, operating principles and key enablers supporting the gradual implementation of the circular economy in the ORLEN Group, including:

- Implementation of circular economy principles to maximise the potential of raw materials embedded in products, by extending the circulation of resources in the economy, recovering value from waste streams and progressively substituting fossil-based raw materials with renewable, circular and secondary inputs;
- Implementation of effective resource management by optimising processes to reduce the consumption of raw materials, water and energy, while promoting reuse, recovery and recycling of waste in line with circular economy principles;
- Utilisation of waste within the value chain, limiting its generation and identifying opportunities for its further conversion into value-added products, in accordance with the waste hierarchy;
- Identification of circular solutions across the life cycle of our products and assets, including in new projects, existing processes and resources generated as a result of the modification or decommissioning of our operations, with due regard to our environmental management framework;
- Fostering partnerships and industrial symbiosis by developing cooperation between ORLEN Group companies and other entities, as well as suppliers, public administration, local authorities and local communities, with a view to enhancing resource efficiency, engaging in joint initiatives and implementing circular economy solutions across the value chain;
- Identification of new business opportunities grounded in circular economy principles and development of products and services aligned with the concept of circularity;
- Expansion of the circular economy potential by identifying opportunities and risks, setting targets and monitoring progress;
- Promotion of research and innovation in the search for alternatives to conventional raw materials, eco-design and comprehensive management of production and product life cycles, with a view to improving resource efficiency and reducing waste, emissions and negative environmental impacts;
- Supporting a responsible supply chain by embedding sustainability and circularity criteria into procurement processes.

Promotion of knowledge and awareness of the circular economy through training and educational initiatives carried out in cooperation with academia, public administration and industrial partners while fostering an organisational culture based on knowledge sharing, best practices and innovation.

By specifying the development priorities, operating principles and key enablers, the Circular Economy Policy directly addresses the most significant impacts, risks and opportunities associated with the circular transformation. Implementation of the Circular Economy Policy will enable us to:

- capitalise on identified opportunities, e.g. by improving our competitiveness, securing access to renewable and circular resources through targeted solutions and partnerships, and creating new revenue streams;
- mitigate negative impacts, e.g. through a gradual reduction of the use of non-renewable resources and improved resource efficiency;
- generate positive impacts, e.g. through the introduction of products based on circular and renewable raw materials;
- minimise identified risks, e.g. through the analysis of processes, market-available technologies and circular solutions, continuous monitoring of market best practices and proactive implementation of circularity measures.

The Circular Economy Policy covers all segments of our operations, namely Upstream & Supply, Downstream, Energy, Consumers & Products, and Corporate Functions. The transition towards a circular economy model supports us in delivering on our commitments under the United Nations Sustainable Development Goals, in particular: 6. Clean water and sanitation; 7. Affordable and clean energy; 9. Industry, innovation and infrastructure; 12. Responsible consumption and production. Implementation of the Circular Economy Policy is the responsibility of the Executive Director for Corporate Governance. The Circular Economy Policy will be reviewed at least once every three years to ensure its continued relevance and alignment with evolving regulatory requirements and our strategic objectives. In 2026, the Policy will be published on the www.orlen.pl website.

## ORLEN Group Environmental Protection Policy

At the beginning of 2025, we adopted the ORLEN Group Environmental Protection Policy, setting out a set of principles to support us in pursuing the sustainable management of natural resources. These principles promote practices ensuring rational and efficient use of natural resources as well as the transition towards a circular economy through actions intended to minimise waste volumes, increase the use of by-products and secondary materials, and develop product and waste recycling. We acknowledge the impact of our operations on the local environment, as well as the need to cooperate with contractors and business partners in order to raise environmental standards. The Policy applies across all ORLEN Group companies and establishes requirements for our business partners to comply with specified environmental standards, while supporting them in their efforts to mitigate negative environmental and climate impacts.

### 6.7.2 Actions and resources in relation to resource use and circular economy [E5-2]

Our actions in relation to circular economy are designed to enhance the resilience and long-term competitiveness of the ORLEN Group. These efforts include the development and implementation of projects enabling the gradual introduction of lower-carbon products (based on renewable or waste-derived materials), the integration of eco-design principles, cost optimisation through a more efficient use of resources, and the expansion into new business areas.

In 2025, we continued projects initiated in previous years and launched new initiatives supporting the circular economy. The examples below illustrate how these initiatives contribute to the implementation of the Circular Economy Policy.

#### Implementation of circular economy principles

We seek to maximise the potential of raw materials embedded in products by extending the economic circulation of resources, recovering value from waste streams and progressively substituting fossil-based raw materials with renewable, circular and secondary inputs as part of the delivery of ORLEN Group's strategic objectives to 2035, including:

- the phase-out of coal-based heat generation by the end of 2035:
  - Climate Neutrality Plans (CNP) for our heat generation assets. An example of circular economy-related initiatives implemented under the CNP are four projects to build heat pumps utilising heat recovered from wastewater in heat generation assets within the Warsaw agglomeration. In 2025, preparatory work was carried out for pumps with a total planned capacity of approximately 250 MWt, with further implementation scheduled for subsequent years;
- steady increase in the share of renewable energy in our fuel mix by 2030, including our investments in:
  - **Hydrotreated vegetable oil (HVO) unit in Płock.** The unit, located on the site of our production plant in Płock, will produce biodiesel and sustainable aviation fuels (SAF) from vegetable oils, used cooking oils, animal fats, etc. Once this facility is in operation, our annual HVO production is expected to reach 300 thousand tonnes. Its commissioning is planned for 2026;
  - **Oil pressing plant in Kętrzyn.** A facility for the production of vegetable oil in Kętrzyn, with an annual capacity of 200,000 tonnes of rapeseed oil. The output will be primarily supplied to the refinery in Trzebinia, owned by ORLEN Południe, where it will be further processed into biocomponents and biofuels. In 2025, construction works on buildings and oil storage infrastructure progressed, with completion scheduled for 2027;
  - **2G bioethanol plant in Jedlicze.** The complex of units for the production of second-generation bioethanol, primarily from straw, with an annual processing capacity of approximately 150,000–180,000 tonnes, will be located at ORLEN Południe's refinery in Jedlicze. In addition to bioethanol, it will produce lignin, to be used as fuel for a biomass-fired boiler in a new on-site CHP plant, as well as liquid organic fertilisers. Construction works continued in 2025, with subsequent project phases planned for the coming years.

#### Implementation of effective resource management

We implement resource management mechanisms to optimise operational processes and minimise our environmental impacts. Our efforts focus on reducing the consumption of raw materials, water and energy, while advancing reuse, recovery and recycling practices, in line with circular economy principles, across the Group's operations. Our key projects in this area include:

- A comprehensive energy efficiency programme deployed in our Downstream assets, designed to bring down energy and resource intensity of production. The programme plays a key role in managing resources effectively and optimising processes to reduce raw material and energy consumption. Currently, more than 100 projects are planned or underway across the ORLEN Group under this programme. All of these initiatives are aligned with the strategic horizon of the ORLEN 2035 Strategy. In the coming years, investment projects are planned at the production plants of ORLEN S.A., Rafineria Gdańska, ORLEN Południe, ORLEN Lietuva, ANWIL S.A., and ORLEN Unipetrol:
  - **Waste heat recovery at ORLEN Unipetrol.** Completed in 2025 as part of the energy efficiency programme, this project enables the recovery of waste heat from flue gases and its use for the generation of process steam required for refinery operations in Kralupy;

  - **Heat utilisation at ORLEN S.A.** In the coming years, a project will be developed to utilise low-temperature heat from one of the units of the production plant in Płock for cooling, enabling the replacement of the existing freon-based cooling system.

- The Hummingbird programme: an employee-driven initiative supporting continual improvement and standardisation of efficiency-enhancing solutions. It provides a simple and intuitive platform for employees to submit their ideas via a dedicated application. Circular economy initiatives implemented as part of the programme in 2025 included:
  - **Refurbishment of certain components of renewable energy units.** At Energa Wytwarzanie S.A., wind turbine gearboxes were refurbished using in-house capabilities, which reduced the need for new components, lowered costs and shortened turbine downtime;
  - **Process optimisation and waste reduction.** At IKS Solino S.A., we optimised the salt tablet production process, enabling the utilisation of approximately 80% of salt waste that had previously remained unused.

## Utilisation of waste

We are increasing the share of circular economy solutions within our value chain by using selected waste streams and converting them into valuable products, in line with the waste hierarchy. Examples of our actions in this area include:

- **Fertilisers from ashes.** ORLEN Termika S.A. expanded its portfolio of by-products from combustion processes, which previously included TERMKRUSZ, TERMASZ and ProAsh (building products and synthetic gypsum), by adding mineral plant growth enhancers produced from biomass ash, marketed as FloraTerm and AgroTerm. In 2025, ORLEN Termika S.A., as the first large-scale producer, obtained approval from the Minister of Agriculture and Rural Development to market mineral plant growth products consisting entirely of bottom and fly ash fractions generated from the combustion of forest or agricultural biomass at the Siekierki CHP plant. As a result, farmers will gain access to a valuable input material, which is produced in the energy generation process. Such projects are also an example of our efforts to explore new circular business opportunities.
- **Development of biomethane production.** The construction of our biomethane production facility in Głąbowo is currently nearing completion. Being the first biomethane plant in the ORLEN Group and the first facility of this type in Poland equipped with a liquefaction unit for the production of bioLNG, it is scheduled to commence operations in 2026 and is expected to produce approximately 7 mcm of biomethane annually. Concurrently, three agricultural biogas plants are operational within the ORLEN Group: in Konopnica (Province of Łódz), Wojny-Wawrzyńce (Province of Białystok) and Buczek (Province of Bydgoszcz and Toruń), with capacities ranging from 1.2 to 2.0 MW. At all these locations, processes have been launched to convert these plants into biomethane production facilities.

## Identification of circular solutions across the life cycle of products and assets

We take steps to identify circular solutions across the life cycle of our products and assets, including in new projects, existing processes and resources generated as a result of the modification or decommissioning of our operations, with due regard to our environmental management framework. Our initiatives in this area include:

- reducing the use of raw materials in ORLEN own-brand packaging:
  - **Reduction in packaging weight.** From September 2025, the weight of 3.1-litre canisters for ORLEN-branded windscreen washer fluids, produced by ORLEN Oil, was reduced from 160 g to 150 g;
  - **Optimisation of water bottles.** The weight of plastic bottles used for VERVA own-brand water was also gradually reduced. In 2025, in connection with the introduction of packaging containing recycled rPET, the weight of bottles in three size formats was reduced by between 1.8% and as much as 7.5%. In line with eco-design principles, bottles for ORLEN own-brand water and juices are made from rPET, are fitted with tethered caps, and use labels that are easy to separate from the bottle, which facilitates the preparation of bottles for further recycling.

## Fostering partnerships and industrial symbiosis

As an integrated multi-energy group, we look for opportunities to establish partnerships and industrial symbiosis through cooperation within the ORLEN Group and by engaging with third-party supplies, public administration, local authorities and local communities. An example of such activities within the ORLEN Group is:

- **HyFly project** – production of RFNBO synthetic fuels. The project involves the construction of a synthetic aviation fuels (e-Jet) production unit with a capacity of approximately 70 kt per year, using hydrogen produced through water electrolysis powered by renewable energy and captured carbon dioxide of biogenic origin from biomass combustion and municipal waste processing. The participation of ORLEN Group companies in this initiative creates new opportunities for the use of our resources. For example, the captured $CO_2$ will originate from the biomass boiler forming part of one of the ORLEN Group companies' assets, as well as from the waste-to-hydrogen project being developed by ORLEN S.A. In addition to the e-Jet RFNBO aviation fuel, we are also assessing the possibility of producing e-naphtha, a feedstock for the petrochemical industry. In

2025, a feasibility study was carried out taking into account synergies between the assets and units participating in the project. In 2025, the HyFly project received a high score in the final evaluation of its application for EU funding under the Innovation Fund, and was nominated for Project Development Assistance (PDA). It was also awarded the STEP Seal by the European Commission, granted to projects distinguished by high quality, innovation and strategic importance for achieving the objectives of the Strategic Technologies for Europe Platform (STEP).

## Identification of new business opportunities

We invest in identifying new business opportunities based on circular economy principles and in developing products and services aligned with the concept of circularity. One such business opportunity is the production and supply of sustainable aviation fuels (SAF) for the aviation sector:

- **Sustainable aviation fuels.** We are expanding our sustainable aviation fuel (SAF) offering. Following the launch of SAF sales at the domestic airports in Warsaw, Kraków and Katowice, as well as in Prague in the Czech Republic, in 2025 we commenced supplies to the Baltic markets. Investments in the refinery in Mažeikiai enabled ORLEN Lietuva to supply SAF at airports in Vilnius, Riga and Tallinn since mid-September 2025.

## Expansion of the circular economy potential

We undertake initiatives aimed at expanding the knowledge of circular economy and the opportunities arising from implementing circularity, as well as an analysis of current challenges in such projects, including:

- **Circular ORLEN.** In 2025, we launched a series of dedicated workshops involving ORLEN Group business segments and companies and devoted to exploring the potential and identifying cross-segment circular economy synergies across the ORLEN Group's operations. This project will be continued in 2026;
- **Assessment of opportunities and impacts.** We also regularly perform an assessment of impacts, risks and opportunities related to the circular economy. Its findings are presented in this Statement.

## Promoting research and innovation

We prioritise research and innovation as key enablers for achieving our strategic objectives and strengthening our competitive position:

- Through our corporate venture capital fund, ORLEN VC, we established partnerships and invested in early-stage companies in 2025, with close cooperation set to continue in 2026:
  - **Advanced recycling**. One such company is ReVentas, which is working on the commercialisation of an innovative proprietary plastics (polypropylene and polyethylene) recycling technology based on dissolution processes.
  - **Innovative SAF production.** Another example is OXCCU, a company developing a technology for the production of synthetic sustainable aviation fuels supported by an innovative catalyst. The technology uses biogenic $CO_2$ and biohydrogen derived from biomass waste, biogas and/or other sustainable $CO_2$ sources to produce SAF.

- **ORLEN Skylight Accelerator.** Under this programme, we provide a platform for collaboration and pilot implementations of innovative technologies and startup solutions that address our current business needs. In November 2025, the 16th call for applications was completed, with further rounds planned for 2026. As part of the 16th call, in the area of the circular economy, we sought:
  - solutions using renewable non-biological feedstocks, such as $CO_2$ and water, in processes enabling energy- and environmentally efficient production of syngas for further synthesis into alternative fuels;
  - solutions for compact technological systems, designed for industrial applications and enabling the utilisation of available process gas streams and the efficient recovery and use of waste heat.

- **NEXTLOOPP.** ORLEN S.A. also participates in an international hybrid recycling project. Through mechanical processes, hybrid recycling delivers recyclate of a quality comparable to that achieved through chemical recycling, while being significantly simpler and more cost-efficient. PolyPrism, the technology behind the project, enables the identification and separation of food-grade polypropylene (PP) from other packaging waste. Feedstock purity achieved with this method reaches up to 95% polypropylene after the first sorting stage and up to 99% after the second. Another essential element of the polypropylene recyclate production is PPristine, a pioneering disinfection technology. In 2025, as part of industrial-scale tests of packaging production for the food and cosmetics industries, we successfully manufactured approximately 14,000 units of packaging with varying shares of recycled content – 35%, 65% and 100%. Work under this project will continue in 2026.

## Supporting a responsible supply chain

We seek to strengthen our supply chain by responsibly managing relationships with our business partners and by identifying and mitigating risks based on environmental, social and governance (ESG) standards. In accordance with the ORLEN Group Sustainable Development Strategy for 2025–2035,

one of the key initiatives is the implementation of a sustainable value chain (Stream 14). We intend to progressively integrate environmental, social and ethical considerations into our procurement processes:

- **Supplier Code of Conduct.** We require our suppliers to make a number of declarations, including that “to the greatest extent possible, the Supplier shall act in accordance with the principles of the circular economy” and that “the Supplier shall seek to source raw materials responsibly and with due respect for the natural environment, and/or to take environmental criteria into account in its purchasing decisions.” For detailed information on the Supplier Code of Conduct, see disclosure ESRS S2.

### Promotion of knowledge and awareness of the circular economy

In 2025, we advanced awareness and understanding of the circular economy through the following initiatives:

- **Circular economy pillars.** Four circular economy pillars were defined for the ORLEN Group: eco-design and circular decommissioning, circular processes, circular resources, and new business streams. These pillars provide a structured framework for implementing circularity principles and circular solutions across processes, products and services in all segments of our operations. The pillars were published in the ORLEN Transition Plan in 2025;
- **Circular Economy Policy.** We developed the ORLEN Group Circular Economy Policy, which was approved by the President of the ORLEN S.A. Management Board and published on our internal corporate platforms. The Policy defines our approach to circularity and sets out development priorities, operating principles and key enablers supporting the gradual implementation of the circular economy in the ORLEN Group;
- **Circular ORLEN.** We launched a series of dedicated workshops involving ORLEN Group business segments and companies, aimed at sharing knowledge and best practices in the area of the circular economy. The project is being continued in 2026;
- **Promotion of the circular economy.** We participated in conferences and published expert articles in the press on circular economy topics.

### Capital expenditure on the circular economy in the ORLEN Group

The implementation of circular economy initiatives, including those presented as examples above and a wide range of energy efficiency measures, required significant capital expenditure. In 2025, our circular economy-related investments totalled PLN 1,035 million, with PLN 1,058 million earmarked for such projects in 2026.

## 6.7.3 Targets related to resource use and circular economy [E5-3]

The ORLEN Group implements its strategy with full consideration of targets related to resource use and circular economy. The development directions, operating principles and key enablers defined in the Circular Economy Policy have been designed to support the effective delivery of strategic objectives while strengthening the Group’s capacity to embed circularity across its operations. The current geopolitical landscape, ongoing supply chain disruptions, increasing consumer expectations, and evolving EU and national regulatory frameworks continue to shape our activities, guiding them towards more efficient resource use, enhanced operational resilience and the development of robust, localised supply chains. Our energy transition is underpinned by maximising value across our traditional business areas while adopting a methodical approach to decarbonising our assets and scaling renewable energy solutions. The implementation of the strategic objectives set out in the ORLEN 2035 Strategy indirectly addresses material impacts, risks and opportunities by aligning with the broader direction of the energy transition, reducing dependence on fossil-based resources, advancing innovative technological solutions and accelerating the decarbonisation of operations. Some of the objectives set out in the ORLEN 2035 Strategy are cross-cutting, meaning they may simultaneously relate to resource inflows and outflows as well as waste management. The ORLEN 2035 Strategy establishes a framework of strategic objectives for the ORLEN Group’s entire operations across two time horizons: 2030 and 2035.

Table 101 Selected strategic objectives of the ORLEN Group related to circular economy

| 2025 | Objective 2030 | Objective 2035 |
|---|---|---|
| 6.7% share of renewable energy in ORLEN fuel mix | 21.1% share of renewable energy in ORLEN fuel mix | 26.1% share of renewable energy in ORLEN fuel mix |
| 1.6 GW of installed renewable generation capacity | 9 GW of installed renewable generation capacity | 12.8 GW of installed renewable generation capacity |
| 1% share of petrochemical products based on circular and renewable feedstocks in total sales | 8% share of petrochemical products based on circular and renewable feedstocks in total sales | 10% share of petrochemical products based on circular and renewable feedstocks in total sales |
| 50 thousand tonnes of installed recycling capacity | 150 thousand tonnes of installed recycling capacity | 250 thousand tonnes of installed recycling capacity |
| 0 million tonnes of carbon capture, transport and storage capacity (CCUS) | | Ca. 1.1 mtpa of carbon capture capacity, enabling $CO_2$ captured from ORLEN's production facilities to be used in the manufacture of synthetic fuels |
| 0 bcm of available biomethane volumes | 0.15 bcm of available biomethane volumes | 0.24 bcm of available biomethane volumes |
| • 1.9 TWh of electricity generated in Ostrołęka B power plant<br>• 13.8 TWh of electricity and heat generated in combined heat and power plants | Phase-out of coal-based electricity generation at power plants by the end of 2030 | Phase-out of coal-based heat generation by the end of 2035 |

Selected objectives of the ORLEN 2035 Strategy are closely aligned with circular economy principles:

- Renewable energy forms the cornerstone of the transition towards a circular economy. In this context, a notable achievement is our progress in the development of the Baltic Power offshore wind farm, implemented as a joint project of the ORLEN Group and Northland Power. This is the first project globally to be constructed using low-carbon steel produced almost entirely from recycled materials in furnaces powered by renewable energy. Moreover, the wind turbines will be recyclable at the end of their operational life at a rate of up to 82%. In 2025, we installed the first Vestas wind turbines with a capacity of 15 MW, along with two offshore substations, while installation work is continuing on additional monopiles, i.e. the structural foundations for offshore wind turbines. For more information on the development of renewable generation capacities, see disclosure ESRS E1;
- The ORLEN 2035 Strategy for the Energy segment includes plans to phase out coal-based power generation by 2030, and coal-based heat generation by 2035. As a result, we expect to reduce emissions of particulate matter and $CO_2$, as well as the volumes of waste generated as combustion by-products. These objectives and their implementation are described in detail in disclosure E1;
- As part of the objective to increase the share of renewable energy in our fuel mix, we are implementing investment projects to expand biofuel production, including the HVO unit in Płock, the rapeseed oil pressing plant in Kętrzyn, the 2G bioethanol complex in Jedlicze and the biomethane production plant in Głąbowo. In parallel, we produce renewable and low-carbon hydrogen for transport applications. In 2025, 155 tonnes of automotive-grade hydrogen, qualifying as low-carbon hydrogen in accordance with the EU Taxonomy, were produced at our plants in Włocławek and Trzebinia;
- We also aim to increase our installed recycling capacity. In 2025, we expanded our mechanical recycling capacity to 50,000 tonnes per year at the REMAQ facility and invested in ReVentas, a company developing hybrid recycling technology based on the dissolution of plastic waste.

The above objectives are embedded in our long-term strategy, the execution of which is subject to regular oversight. They reflect our business ambitions. Our strategic objectives were announced in 2025. Our strategy is regularly updated to reflect evolving market, regulatory and technological dynamics and ensure that our current objectives are effectively delivered and our competitive advantage is maintained.

### 6.7.4 Resource inflows [E5-4]

Our operations rely mainly on technical resources, including primary hydrocarbons (principally crude oil and natural gas) and process additives. At the same time, in line with the ORLEN 2035 Strategy, we aim to gradually increase the share of biological and circular feedstocks within our products.

In our own operations, we utilise property, plant and equipment concentrated across four core business segments:

- Upstream & Supply,
- Downstream,

- Energy,
- Consumers & Products.

Among these assets are seven refineries located in Poland, Lithuania, and the Czech Republic, power and CHP plants, renewable energy generation facilities, and a network of over 3,500 service stations in Poland, Germany, the Czech Republic, Austria, Hungary, Slovakia, and Lithuania.

The Upstream & Supply segment is responsible for producing natural gas and crude oil and preparing products for sale. This involves the end-to-end exploration and production process, from geological surveys and geophysical research, through to drilling and field development, to hydrocarbon production. The segment's activities are conducted in:

- Poland (including the PGNiG Branch Complex, LOTOS Petrobaltic and LOTOS Upstream),
- Norway (ORLEN Upstream Norway AS),
- Canada (ORLEN Upstream Canada Ltd.), and
- Pakistan.

In 2024–2025, we continued oil and gas production activities, delivering essential resource streams that form the foundation of technical inputs for our production systems. The production structure in the reporting period comprised four principal categories:

- Natural gas and crude oil: the core of the upstream portfolio, produced in both onshore and offshore operations;
- Condensate and NGLs: complementing the stream of liquid raw materials and playing an essential role in optimising production inputs.

Table 102 ORLEN Group production volumes

| Description | Unit of measure | 2025 | 2024 (restated) | 2024 (as reported in the Sustainability Statement) |
|---|---|---|---|---|
| Natural gas | thousand bbl | 54,325 | 55,385 | 56 516 |
| Crude oil | thousand boe | 15,610 | 16,628 | 16 368 |
| Condensate | thousand bbl | 2,722 | 3,050 | 3 310 |
| NGL | thousand bbl | 902 | 906 | 906 |

In 2024–2025, our material mix continued to be dominated by technical materials, with a progressively growing share of biological components:

- **Product inflows**: their share rose to 3.8% in 2025 from 2.6% in 2024, reflecting increased use of goods and components required to support the expanding scale of our service and production processes.
- **Technical materials**: continued to represent the core input component, but their share declined to 92.7% in 2025 from 96.1% in 2024. As a result of the ongoing diversification of our material mix towards alternative solutions.
- **Biological materials**: in line with our strategic decarbonisation pathway, the share of this category rose to 3.5% in 2025 from 2.7% in 2024, confirming the growing role of biocomponents within our portfolio.
- In addition to these main categories, our resource inflows include inputs procured from certified sources and secondary materials. These contribute to the advancement of circular economy objectives, the reduction of our environmental footprint and the increased share of alternative resources within our material mix.
- **Sustainably sourced biological materials** – the share of sustainably sourced biological materials and biofuels was 1.9% in 2025 vs 1.4% in the previous year.
- **Recycled raw materials and components** – the share of reused components, products, and secondary raw materials amounted to 0.2% in 2025 (compared to 0.1% in the previous year).

Table 103 ORLEN Group resource inflows [tonnes]

| Description | 2025 | 2024 (restated) | 2024 (as reported in the Sustainability Statement) |
|---|---|---|---|
| Total weight of product inflows | 1,936,930.99 | 1,518,517.82 | 1,000,242.00 |
| Total weight of biological material inflows | 1,774,397.33 | 1,375,070.88 | 575,232.00 |
| Total weight of technical material inflows | 47,281,492.85 | 48,553,523.41 | 10,064,376.00 |
| Total weight of products, biological materials and technical materials | 50,992,821.17 | 51,447,112.11 | 11,639,850.00 |
| Total weight of biological materials (and biofuels used for non-energy purposes) used to manufacture the undertaking's products and services (including packaging) that are sustainably sourced | 983,699.34 | 739,301.41 | 323,398.00 |
| Total weight of secondary reused or recycled components, secondary intermediary products and secondary materials used to manufacture the undertaking's products and services (including packaging) | 79,228.90 | 42,168.79 | 33,480.00 |

The management of biological materials within the Downstream segment is primarily carried out through the Integrated Management System at ORLEN Południe S.A., which ensures:

- compliance with the RED II requirements,
- certification under ISCC systems,
- certification under the KZR INiG system,
- oversight of raw material procurement, mass balance and GHG emissions,
- periodic confirmation of compliance by independent external auditors.

The process covers the entire value chain, from supplier qualification to reporting emissions and finished products.

In addition, we use biomass in accordance with the cascading use principle. Agricultural waste is processed into biogas, which is followed by the certification of digestate as an organic fertiliser, enabling the return of biogenic components to the ecosystem.

In our catalytic processes, we use platinum group metals (platinum and palladium) and silver as critical raw materials. We apply an advanced circular model by engaging specialised external operators to recover precious metals from spent catalysts at a very high efficiency level. In 2024, the volume of recovered metals amounted to approximately 152 tonnes, while in 2025 it was approximately 51 tonnes. The year-on-year variability in reported volumes follows from:

- maintenance cycles of our production assets – the transfer of catalysts for disposal and recovery is closely linked to the maintenance schedules and the lifecycle of the catalytic cores,
- the operational characteristics of the recovery process – time lags resulting from the technological complexity of recovery processes carried out by the external operators.

The efficiency of metal recovery from catalysts in 2024-2025 ranged from 98% to 99%, with the recovered materials reintroduced into the production cycle. This model reduces our dependence on primary raw materials and our environmental footprint in the supply area.

The data presented cover key raw material and material flows of the highest materiality to the ORLEN Group's business profile. We are in the process of expanding the scope of monitoring of our resource inflows to include other categories, reflecting our ambition to continuously enhance our reporting system. The implementation of a more advanced calculation methodology and the progressive inclusion of additional raw material flows in our reporting may affect the direct comparability of data in the short term. However, this process is necessary to obtain complete and transparent information on our environmental impacts across the value chain. The calculations are based on data from management systems and calibrated measuring devices, and, in the case of estimates, on recognised industry benchmarks.

### 6.7.5 Resource outflows [E5-5]

Waste management is a material topic identified in the impact, risk and opportunity (IRO) assessment for the ORLEN Group conducted in accordance with ESRS requirements.

In line with the ORLEN 2035 Strategy, as of January 2025, our operations are carried out within the following operating segments: Upstream & Supply, Downstream, Energy, Consumers & Products and Corporate Functions.

As part of our operations we generate hazardous waste and non-hazardous waste, in particular from processes specific to the above segments, including refining, petrochemical, energy-related and hydrocarbon production processes, the production of organic and inorganic chemical products, as well as service activities.

These processes also determine the structure of our waste volumes, which, due to our diversified business profile, includes in particular:

- waste from refining and petrochemical processes (including residues, sludges, spent catalysts, oil waste),
- waste from the production of organic and inorganic chemicals (including nitrate melts, organochlorine waste, brine sludges),
- combustion waste from energy generation activities (including ash and slag),
- extraction and drilling waste (including drilling fluids, sludges),
- other waste, including that from service activities, packaging, construction and demolition.

The waste streams listed above are key categories specific to the operations of each operating segment. The materials present in waste are closely linked to the nature of production activities carried out at individual plants and units, as well as to the type of raw materials and auxiliary materials used. These include, in particular, plastics, metals, non-metallic minerals, biomass, organic and inorganic materials, textiles and various types of chemicals.

## Calculation methodology

Given the diversity of our business activities, the types and characteristics of the waste they generate also vary considerably. Waste generated by the ORLEN Group includes waste from hydrocarbon extraction activities, crude oil refining, the production of organic and inorganic chemicals, combustion, product packaging, as well as service activities. We do not generate any radioactive waste.

The amount of waste generated by the ORLEN Group companies is documented and reported in accordance with the laws in force in each country, using locally implemented systems. The applicable system in Poland is the Database on Products and Packaging and on Waste Management (BDO), which maintains an ongoing quantitative and qualitative record of generated waste (based on supporting documentation such as waste transfer notes (KPO) and waste record sheets (KEO)) and waste management methods. The obligation to maintain waste records does not apply to the municipal waste stream. The quantities of waste reported in the BDO database are determined on the basis of direct measurements, i.e. weighing. The quantity of municipal waste may be determined using a permitted method other than weighing, i.e. based on the volume of generated waste and its average density. Where possible, for example in relation to ash and slag or flue gas desulphurisation processes, waste is reclassified as by-products. Such re-classified by-products are not included in the total amount of waste generated from our own operations.

Our classification of waste is based on the types of industrial processes in which it is generated (e.g. hydrocarbon extraction, crude oil refining, production of organic and inorganic chemicals, combustion, product packaging, service activities), and the morphology (composition) of the waste itself. The classification is aligned with the methods specified in integrated or sectoral permits. The composition of waste is closely linked to the nature of technological processes carried out at each plant and facility, as well as to the types of raw materials and auxiliary materials used in those processes. An analysis of the chemical composition of waste is carried out only in limited cases, and with respect to selected types of waste. Such analysis is necessary, for example, in the process of reclassification of waste as a by-product, e.g. in the case of combustion waste.

Waste management methods applied across the ORLEN Group are governed by applicable legal regulations, permits, adopted standards and policies (including the ORLEN Group Environmental Protection Policy, the ORLEN Group Circular Economy Policy, and Organisational Standard No. SO/4/2023 of 20 December 2023 on hazardous waste management), as well as procedures and regulations specific to individual ORLEN Group companies. Their purpose is to prevent waste generation and minimise the negative impact of activities related to waste generation and management. Waste generated within the ORLEN Group is transferred to specialised third-party operators holding relevant permits and authorisations for waste management, in compliance with legal requirements. In accordance with Organisational Standard No. SO/4/2023, following the final treatment of hazardous waste by qualified operators, such operators provide documentation confirming the treatment method applied.

Waste management activities within the ORLEN Group are carried out in strict compliance with applicable legal regulations and permits. In accordance with the Waste Act, where recovery (R) is not possible for technological reasons or cannot be carried out in a manner that ensures the safety of people and the environment, waste is subjected to disposal (D) operations. The decision to direct waste to disposal is made based on the classification of waste and its specific properties, in cases where recovery technologies are not available (e.g. spent oil-based drilling fluids on rock cuttings) or the safety of people and the environment is not guaranteed. Other reasons include a high level of contamination, composition and toxicity, which prevent the use of recovery and recycling operations, no possibility of further use, and economic considerations. Due to the chemical composition and toxicity of certain types of waste, the statutory priority is their complete neutralisation rather than recycling, which could lead to environmental contamination or contamination of end products.

Certain ORLEN Group companies hold the status of an entity placing packaged products on the market and are therefore subject to the extended producer responsibility (EPR) system under EU regulations. The ERP framework transfers the financial and organisational responsibility for the management of waste generated after the use of packaging to entities placing packaged products on the market, in accordance with the ‘polluter pays’ principle. These Group companies maintain

quantitative and weight-based records of all types of packaging placed on the market, covering primary, secondary and transport packaging.

Obligations to ensure the required annual recycling rate for the mass of packaging placed on the market are fulfilled by ORLEN Group companies under agreements concluded with recovery organisations and business self-government organisations with regard to non-hazardous packaging, as well as with regard to multi-material packaging and packaging containing hazardous substances. ORLEN S.A. manages a network of service stations where it offers packaged products, ready-to-eat food services, as well as plastic shopping bags and single-use plastic products subject to the Single-Use Plastics (SUP) fee. It also places on the market deposit-return packaging of beverages, such as single-use plastic bottles with a capacity of up to 3 litres and metal cans of up to 1 litre. The Company pays the applicable fees. It also achieved the required recycling rate for packaging placed on the market and ensured the proper flow of funds related to the collection of deposits. In addition, ORLEN S.A. bears financial responsibility for the management of waste generated from these products under the EPR framework. This includes the costs of litter collection, emptying of public waste bins, as well as financing dedicated educational campaigns concerning SUP products. These costs are calculated separately for each kilogram of products placed on the market and are incurred independently of the standard Public Educational Campaigns (PKE), which are delivered on the Company's behalf by a recovery organisation under a relevant agreement.

## Table 104 Amount of waste generated at the ORLEN Group [tonnes]

| | Description | 2025 | 2024 (restated) | 2024 (as reported in the Sustainability Statement) |
|---|---|---|---|---|
| **1** | **Total weight of waste not directed to disposal (2+6)** | **483,852.25** | **452,576.65** | **384,103.00** |
| **2** | **Total weight of hazardous waste not directed to disposal (3+4+5)** | **33,780.96** | **37,068.37** | **28,743.00** |
| 3 | Weight of hazardous waste prepared for reuse | 7,949.14 | 5,485.21 | 2,964.00 |
| 4 | Weight of hazardous waste recycled | 20,504.25 | 25,589.53 | 21,774.00 |
| 5 | Weight of hazardous waste subject to other recovery operations | 5,327.57 | 5,993.63 | 4,006.00 |
| **6** | **Total weight of non-hazardous waste not directed to disposal (7+8+9)** | **450,071.29** | **415,508.27** | **355,359.00** |
| 7 | Weight of non-hazardous waste prepared for reuse | 9,609.77 | 10,674.19 | 5,962.00 |
| 8 | Weight of non-hazardous waste recycled | 149,697.26 | 143,538.58 | 137,974.00 |
| 9 | Weight of non-hazardous waste subject to other recovery operations | 290,764.26 | 261,295.50 | 211,424.00 |
| **10** | **Total weight of waste directed to disposal/ not recycled (11+15)** | **611,880.86** | **555,214.05** | **551,824.00** |
| **11** | **Total weight of hazardous waste directed to disposal (12+13+14)** | **48,755.63** | **31,825.82** | **44,991.00** |
| 12 | Weight of hazardous waste incinerated | 26,872.93 | 20,019.24 | 20,261.00 |
| 13 | Weight of hazardous waste landfilled | 13,020.84 | 5,036.37 | 5,187.00 |
| 14 | Weight of hazardous waste subject to other disposal operations | 8,861.86 | 6,770.21 | 19,543.00 |
| **15** | **Total weight of non-hazardous waste directed to disposal (16+17+18)** | **563,125.23** | **523,388.23** | **506,833.00** |
| 16 | Weight of non-hazardous waste incinerated | 11,067.76 | 10,770.48 | 11,710.00 |
| 17 | Weight of non-hazardous waste landfilled | 132,486.37 | 132,770.53 | 123,841.00 |
| 18 | Weight of non-hazardous waste subject to other disposal operations | 419,571.10 | 379,847.22 | 371,282.00 |
| **19** | **Total weight of waste generated (1+11+15)** | **1,095,733.11** | **1,007,790.70** | **935,927.00** |
| **20** | **Total weight of hazardous waste (2+11)** | **82,536.59** | **68,894.18** | **73,735.00** |
| 21 | Total weight of radioactive waste | 0.00 | 0.00 | 0.00 |
| **22** | **Total weight of non-hazardous waste (6+15)** | **1,013,196.52** | **938,896.50** | **862,192.00** |
| 23 | Total amount of waste stored at the end of the reporting year | 84,142.87 | 25,445.44 | N/A |

Total amount of non-recycled waste:

- in 2025 – 925,531.60 tonnes (84,47%),
- in 2024 – 838,662.59 tonnes (83.22%).

## 6.8 ORLEN Group workforce [ESRS S1]

**[S1.SBM-2]**

### Interests and views of stakeholders

The interests and views of stakeholders play a pivotal role in informing the ORLEN Group's strategy and business model. Our workforce constitute a key stakeholder group. Topics identified as material by people in our workforce include occupational health and safety, working conditions and remuneration, employment stability, skills development, and social dialogue. We rely on various means to gain an insight into the views of this stakeholder group, including dialogue with workers' representatives, applicable internal regulations and HR processes. These insights are subsequently reflected in the ORLEN Group's policies and management actions. The interests and views of stakeholders are considered in the process of updating the materiality assessment, shaping our HR policies and standards, planning occupational safety and DEI actions, and in the continuous improvement of our human capital management practices.

**[S1.SBM-3]**

### Interaction between material risks and opportunities and the undertaking's strategy and business model

All individuals comprising the ORLEN Group's own workforce, who could be materially impacted by the Group, are included in the scope of disclosures under ESRS 2, enabling full transparency and the identification of potential risk exposures. Our own workforce includes all persons employed directly by Group companies, namely employees hired under open-ended employment contracts, fixed-term employment contracts, probationary period contracts and temporary substitution contracts, across the various countries in which the Group operates. Non-employee workers in the workforce are primarily self-employed individuals providing services under B2B arrangements based on civil law contracts and, to a lesser extent, individuals supplied by third-party entities primarily engaged in employment activities.

Responsibility for our workforce constitutes an important pillar of the ORLEN Group's strategy, reflected in our core values and business goals. In response to identified challenges, the strategy has been adjusted to mitigate negative impacts while supporting the development of human resources.

At the ORLEN Group, a **two-way alignment** is maintained between the strategy and double materiality assessment:

**Strategy→DMA** The nature of operations, the business model, and strategic objectives determine the identification of impacts, risks and opportunities.

**DMA→Strategy** The outcomes of the double materiality assessment (DMA) inform updates to the strategy, policies, and action plans.

In parallel, we continually monitor employee engagement and satisfaction levels, enabling our business model to be tailored to evolving workforce needs while balancing our strategic goals with employee well-being. In 2025, the survey was conducted across 20 Group companies. For detailed information on actions in relation to the impacts, risks and opportunities, see disclosure S1-4. We did not identify any workers with particular characteristics on whom the ORLEN Group had a negative impact. Likewise, we did not identify any material risks and opportunities that were specific to particular groups of workers.

Presented below is the full list of impacts, risks, and opportunities for the ORLEN Group, as identified through the double materiality assessment process:

## Table 105 Double materiality assessment summary for own workforce [S1.IRO-1]

| Segment | Area | Geographical region | S1<br>Risk, opportunity, impact | Impact (I)<br>Risk (R)<br>Opportunity (O) | Positive (+)<br>Negative (-) | Actual (A)<br>Potential (P) | Value chain<br>Organisation (O)<br>Downstream (D)<br>Upstream (U) |
|---|---|---|---|---|---|---|---|
| Upstream & Supply, Downstream, Energy, Consumer & Products, Corporate Functions | Refining, Upstream, Energy, Petrochemicals, Gas, Retail, Corporate Functions | Europe+ Canada +Libya+ Pakistan | **Secure employment** | | | | |
| | | | Broad range of employee benefits | I | + | A | O |
| | | | Greater attractiveness as an employer in the labour market – reputation as a stable employer | O | | | O |
| | | | **Working time** | | | | |
| | | | Availability of hybrid working arrangements | I | + | A | O |
| | | | **Adequate wages** | | | | |
| | | | Pay consultations with employees' representatives | I | + | A | O |
| | | | Greater attractiveness as an employer in the labour market supported by fair pay and benefits | O | | | O |
| | | | **Social dialogue with employees** | | | | |
| | | | Improved employee wellbeing through social dialogue | I | + | A | O |
| | | | Improved productivity and operational efficiency through fostering comfort, trust and transparent employer-employee relations | O | | | O |
| | | | **Freedom of association, the existence of works councils and the information, consultation and participation rights of workers** | | | | |
| | | | Organisation's support for freedom of association, the existence of works councils and the information, consultation and participation rights of workers | I | + | A | O |
| | | | **Collective bargaining, including percentage of employees covered by collective bargaining agreements** | | | | |
| | | | Multiple trade unions operating within the organisation | I | + | A | O |
| | | | **Work-life balance of the workforce** | | | | |
| | | | Availability of benefits | I | + | A | O |
| | | | **Health and safety** | | | | |
| | | | Challenging working conditions in production roles | I | - | A | O |
| | | | Costs of non-compliance with health and safety requirements | R | | | O |
| | | | **Gender equality and equal pay for work of equal value** | | | | |
| | | | Pay inequality | I | - | P | O |
| | | | **Training and skills development** | | | | |
| | | | Extensive training offer | I | + | A | O |
| | | | Increased competitiveness and revenue through skills development and workforce specialisation | O | | | O |
| | | | **Diversity at the workplace** | | | | |
| | | | Diversity and inclusion initiatives | I | + | A | O |
| | | | **Measures against violence and harassment in the workplace** | | | | |
| | | | Inadequate response in the event of a potential incident | I | - | P | O |
| | | | **Privacy of employees** | | | | |
| | | | Data breaches affecting employee personal data | R | | | O |

| | | short-term | medium-term | long-term |
|---|---|---|---|---|
| Secure employment | O | ✓ | ✓ | ✓ |
| Adequate wages | O | ✓ | ✓ | ✓ |
| Social dialogue with employees | O | ✓ | ✓ | ✓ |
| Health and safety | R | ✓ | ✓ | ✓ |
| Training and skills development | O | ✓ | ✓ | ✓ |
| Privacy of employees | R | ✓ | ✓ | ✓ |

### 6.8.1 Policies related to own workforce [S1-1]

At the ORLEN Group, we have implemented a set of documents and policies that support the management of material impacts on our own workforce. Some of these are universal in scope, while others have been developed in relation to specific areas of impact.

The policies currently in force at the ORLEN Group include:

- ORLEN Group Code of Ethics,
- ORLEN Group Human Rights Policy,
- ORLEN S.A. Diversity Policy,
- Collective Bargaining Agreements and Remuneration Rules,
- Work Rules,
- Occupational Safety Management System,
- ORLEN Group Policy for the Management of Occupational Health and Safety, Fire Safety, Process Safety, and Safety of Storage and Transport of Dangerous Goods, including the Safety Standards and Technical Standards,
- ORLEN S.A. Workplace Bullying, Discrimination and Harassment Prevention Rules,
- ORLEN Group Human Resources Management Policy,
- Well-Being Policy,
- Family-Friendly Employer programme,
- Corporate Social Benefit Activity Rules,
- Distinguished ORLEN Employee programme,
- ORLEN Group Whistleblower Protection Policy,
- policies pertaining to information security and personal data protection,
- Organisational Standard for Personal Data Processing and Protection, and for Information Security.

ORLEN Group Code of Ethics

Developed by ORLEN S.A., our Code of Ethics sets out clear, practical and up-to-date guidelines defining standards of conduct applicable to all employees, in alignment with the Group's core values: Responsibility, Progress, People, Energy and Dependability. The Code also articulates our position on the ethical principles and standards governing the Group's activities, as well as their current scale and strategic direction, expectations towards our business partners, and best practices in business ethics. Overall responsibility for its implementation rests with the ORLEN S.A. Management Board, while operational oversight is exercised by the relevant Directors. The ORLEN Group Code of Ethics is publicly available on the corporate intranet and on our website at: www.orlen.pl.

Human Rights Policy

The Human Rights Policy details the standards for conduct, behaviour, and regulations applicable across the Group that directly or indirectly pertain to the protection of human rights, both within the organisation and in our interactions with external stakeholders. The Policy actions are grounded in internal regulations, national legislation, and internationally recognised standards and guidelines, including: the Universal Declaration of Human Rights, the ILO Declaration, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines, the IFC Performance Standards, and the 10 Principles of the United Nations Global Compact. In matters relating to human rights, forced labour and child labour, our Human Rights Policy clearly affirms the ORLEN Group's zero-tolerance approach to any form of abuse or violation of human rights and children's rights. Any potential case of human rights abuse or breach of the highest standards of ethical business conduct, as outlined in the Policy, would be met with our firm response and immediately reported to the competent law enforcement authorities. The provisions of the Policy apply across all Group companies, our entire value chain, and all geographies in which the ORLEN Group operates. Overall responsibility for its implementation rests with the ORLEN S.A. Management Board, while operational oversight is exercised by the relevant Directors. The document is available on the corporate intranet and on our website at: www.orlen.pl.

ORLEN S.A. Diversity Policy

The principles set out in our Diversity Policy are aimed primarily at enhancing awareness and understanding of the role of diversity, while creating an open and inclusive workplace culture. The Policy actions are also grounded in our internal regulations. Areas covered by the Policy include recruitment, hiring, promotions, protection against unjustified dismissal, prevention of workplace bullying and discrimination, access to training opportunities, and work-life balance. Responsibility for its implementation rests with the Executive Director for HR. The Diversity Policy includes no provisions that would govern the process for monitoring or evaluating its application. The document is available on our corporate intranet.

Collective Bargaining Agreements and Remuneration Rules

The Collective Bargaining Agreement is a labour law contract negotiated through bargaining between the employer and trade unions present at the respective company. Serving as an 'HR constitution', the document establishes a coherent and incentive-based remuneration and bonus system, sets standards for employer-employee relations, and defines norms fostering an equitable partnership between the employer and trade unions. Individual employers within our Group conclude separate Collective Bargaining Agreements, the provisions of which apply to all employees of the respective company.

The Collective Bargaining Agreement in place at ORLEN S.A. governs a number of areas, including:

- employment, promotions and termination of employment contracts,
- remuneration, bonus schemes and other employment or work-related benefits,
- professional development and training,
- working conditions and mutual obligations of the parties to the employment relationship,
- working time and leave entitlements,
- trade union activity and social dialogue at ORLEN S.A.

At companies that have not concluded Collective Bargaining Agreements, Remuneration Rules are in place, which apply to all workforce members with employment contracts and define remuneration and bonus systems, including the level of pay and its components. The Collective Bargaining Agreements and Remuneration Rules are generally accessible to all employees and trade unions, with responsibility for their implementation resting with the Management Boards of the respective Group companies.

## Work Rules

The Work Rules constitute the primary internal framework governing employment conditions and the organisation of work at the ORLEN Group. Alongside principles derived from generally applicable labour laws, in particular the Polish Labour Code, they also contain provisions tailored to the specific nature of our Group's operations.

The Work Rules cover the following key areas:

- organisation and orderly conduct of work processes,
- working time and its recording for payroll purposes,
- occupational health and safety, including the protection of workers' health,
- rights and obligations of employees and the employer,
- disciplinary liability and procedures in the event of breaches of employee duties.

The Work Rules apply to all employees of the Group companies covered by their scope. They are implemented by the Management Board of each company working closely with workers' representatives and trade unions, in accordance with the applicable legal provisions. The document is made available to employees via our corporate intranet or other internal communication channels.

## Occupational health and safety management systems

Companies of the ORLEN Group operate structured occupational health and safety (OHS) management systems, developed in accordance with internal policy documents and operational instructions, and fully compliant with the requirements of national legislation. A majority of ORLEN Group companies adhere to the ISO 45001 compliant occupational health and safety management system or, alternatively, they are subject to internal and external audits. These companies have established their own OHS policies covering all operational areas and applying to both employees in their own workforce and to contractor staff.

At the Group level, we have implemented a coherent and comprehensive policy-based approach to occupational safety management. In 2025, updated Organisational Standard No. SO/11/2025 Ed. 2 was introduced covering the ORLEN Group Policy for the Management of Occupational Health and Safety, Fire Safety, Process Safety, and Safety of Storage and Transport of Dangerous Goods. The Standard was approved by the ORLEN Group Council (Resolution No. 13/2025 of 10 December 2025), and entered into force on the same date. The Policy aims to ensure consistent standards of occupational health and safety and process safety across the ORLEN Group, and to enhance intra-group collaboration and effective information sharing related to safety matters. The system tools defined in the Policy include a set of Safety Standards and Technical Standards of the ORLEN Group, as well as the functional strategy for process safety, fire safety and occupational health and safety until 2035. These Standards represent our uniform requirements for work safety, fire safety, process safety, and safety of operations involving the handling of dangerous goods, including best practices identified within the Group companies and standards adopted by leading industry peers. Responsibility for the implementation and application of the Policy rests with the Management Boards of ORLEN Group companies. The document has been made available to workers via our corporate intranet.

## Well-Being Policy

Our Well-Being Policy offers key solutions designed to improve the quality of our employees' lives and their overall well-being across multiple dimensions. Its objective is to define initiatives intended to support employees' physical and mental health, and to mitigate the adverse effects of stress and discomfort in both professional and personal contexts. Initiatives implemented under the Well-Being Policy are structured across specific dimensions, including wellness, workplace comfort, job satisfaction, work-life balance, and the external environment. Oversight of the implementation and application of the Policy, and of related HR activities, is exercised by the Executive Director for HR. Its provisions apply to employees of ORLEN S.A., with the implementation of solutions developed within ORLEN S.A. extended also to other Group companies. The Policy is available to employees via our corporate intranet.

## Family-Friendly Employer programme

The programme defines solutions designed to help our employees balance their professional and private lives by offering a range of family-related benefits and support measures (in addition to parental rights provided under the Labour Code and the ORLEN S.A. Work Rules). The programme includes dedicated arrangements for parents of the youngest children (up to three years of age), employees with disabilities, and those providing care to family members. It also addresses matters related to long service jubilees, retirement and birthdays of former employees. Oversight of compliance with the document, which is applicable to all ORLEN S.A. employees, is exercised by the Executive Director for HR. Many of the programme's components have also been implemented by other Group companies as part of best practice sharing. Information about the document is available on the corporate intranet and on our website at www.orlen.pl. Updates on what has been going on at the Company are also sent to the home addresses of employees on maternity, paternity, parental or childcare leave.

## Corporate Social Benefit Activity Rules

The Rules, based on the Polish Act on Company Social Benefits Funds and the relevant regulation of the Minister of Labour and Social Policy, define eligibility, the purposes for which funds may be allocated, and the criteria for granting benefits. The document applies to employees, former employees and their family members, covering both ORLEN S.A. and other partner entities that are parties to our joint social benefits programme. The provisions of the Rules are agreed with trade unions present at ORLEN S.A. Oversight of compliance is exercised by the Executive Director for HR, while Directors reporting to this role are responsible for supervision within their respective areas. The Rules are available on our intranet and have also been distributed to partner entities participating in the joint social benefits programme with ORLEN S.A.

## Distinguished ORLEN Employee programme

This programme defines the standards of conduct, daily behaviours and attitudes expected of all employees, to be practised both within and outside the organisation. Its purpose is to establish the rules and procedures for awarding the 'Distinguished ORLEN Employee' title in alignment with our core values:

- Responsibility,
- Progress,
- People,
- Energy, and
- Dependability.

'Distinguished ORLEN Employee' is a long-established honorary title conferred by the President of the Management Board in recognition of outstanding professional, social, and ethical contributions aligned with the ORLEN Group's values. It is the highest and most prestigious distinction at the Company, awarded every year to employees within three categories: for lifetime outstanding service, exceptional professional achievements and socially responsible attitudes. The programme applies to all ORLEN S.A. employees, with oversight of compliance exercised by the Executive Director for HR. The document has been consulted with the relevant functions and trade unions active at ORLEN S.A. It is available on our corporate intranet.

## Whistleblower Protection Policy

Within the ORLEN Group, the Whistleblower Protection Policy is grounded in applicable legislation, in particular the Polish Act on the Protection of Whistleblowers of 14 June 2024 (Dz.U. of 2024, item 928), which constitutes the transposition of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law (OJ L 305, 26.11.2019). The purpose of the Policy is to ensure consistent standards across our Group companies for the protection of individuals reporting breaches of law, internal regulations, or ethical standards. It defines the requirements, responsibilities, and procedures for the receipt and handling of whistleblower reports in a manner that guarantees security, confidentiality, and impartiality.

Topics addressed by the Policy include:

- prevention of legal and regulatory breaches,
- protection of individuals reporting violations of law or internal regulations,
- compliance with applicable whistleblower protection legislation,
- assurance that all reports are handled with due diligence and that whistleblowers are protected against any form of retaliation.

The Whistleblower Protection Policy has been implemented at ORLEN Group companies required to establish such internal frameworks under the applicable legislation. It applies to all workforce members and extends across our entire value chain. Its implementation within individual Group companies reflects local legal requirements in their home jurisdictions, as well as the specific nature of their operations, branches or representative offices. Responsibility for the implementation and application of the Policy rests with the ORLEN S.A. Management Board, while operational oversight is exercised by the relevant Directors.

The Policy is aligned with:

- the United Nations Guiding Principles on Business and Human Rights,
- the OECD Guidelines for Multinational Enterprises,
- the International Bill of Human Rights.

The scope of reportable breaches defined in the Whistleblower Protection Policy includes constitutional freedoms as well as human and civil rights. The Policy is made available to all employees via our corporate intranet and communicated to workforce members without intranet access by their respective line managers. The Group's trade partners are introduced to the Policy prior to entering into business relationships, while other external stakeholders can access it via www.orlen.pl. The ORLEN S.A. Economic Security Office maintains a register and archive of reported cases, with access restricted to authorised personnel only, reflecting the confidentiality of these records.

ORLEN Group Human Resources Management Policy

The Policy establishes a framework for identifying, developing and effectively deploying the potential and skills of people in our workforce, supporting the Group's long-term capacity to deliver on its business and sustainability strategies. The Policy applies to the Group's own workforce, forming an integral part of its human capital management system. Its objectives are to foster the professional development of employees, ensure equal access to development opportunities, and build a succession pipeline for key competencies across the Group. The ORLEN Group Human Resources Management Policy is grounded in the principles of respect for human rights, equal treatment, non-discrimination, and social dialogue, in line with our core values and applicable requirements of the labour law. It applies at the Group level, with due account taken of local legal and organisational conditions relevant to individual companies. Responsibility for its implementation at ORLEN S.A. rests with the Executive Director for HR. The document can be accessed via our corporate intranet.

Personal data processing and protection framework

This framework is designed to ensure the protection of individuals, including people in our workforce, in connection with the processing of their personal data, in compliance with applicable legal requirements, in particular the General Data Protection Regulation (GDPR) and national legislation governing that area. It defines the principles of lawful, secure, and accountable personal data processing, the roles and responsibilities of personnel involved in the processing activities, as well as mechanisms for risk management, incident response, and the exercise of data subjects' rights. These provisions apply to all employees of ORLEN S.A., irrespective of the geographical location where they are based, as well as individual contractors rendering their services to the Company. Companies of the ORLEN Group may adopt a harmonised personal data protection standard, aligned with the framework implemented at ORLEN S.A. The framework covers all personal data processing activities carried out by ORLEN S.A., both in its capacity as data controller and data processor. It also extends to our relationships with external parties, including contractors and suppliers, by governing data processing agreements, data sharing, and audits of processors. Accordingly, the framework addresses relevant elements of our value chain wherever personal data processing occurs. Ultimate responsibility for the implementation of the personal data protection framework at ORLEN S.A. rests with the Management Board.

While the framework does not explicitly reference the UN Guiding Principles on Business and Human Rights, the ILO Declaration, or the OECD Guidelines for Multinational Enterprises, its underlying principles of privacy protection, respect for individual rights, accountability, data minimisation, and risk management are consistent with internationally recognised standards on human rights and responsible business conduct. The framework does not contain explicit provisions addressing human trafficking, forced or compulsory labour, and child labour. The documentation is made available to employees and other authorised persons via our corporate intranet and at www.orlen.pl. It provides for mechanisms to monitor and evaluate compliance with personal data protection rules. Compliance with the data processing requirements, as well as the effectiveness of technical and organisational measures we have put in place, are monitored on a day-to-day basis by process owners, and through periodic audits and inspections conducted by the Data Protection Officer or the Data Protection Team.

### 6.8.2 Processes for engaging with own workers and workers' representatives about impacts [S1-2]

At the ORLEN Group, structured engagement with employees to gather feedback plays a critical role in managing both actual and potential impacts on our own workforce. We actively encourage employees to speak up, share their perspectives and contribute ideas. The most senior body within the ORLEN Group responsible for ensuring proper cooperation with its own workers is the ORLEN S.A. Management Board.

- One form of engaging with our own workers is regular preventive sessions, introduced at ORLEN S.A. in 2025. These recurring meetings are designed to proactively address workplace risks, including bullying and discrimination, enhance safety, and promote a positive working environment. These sessions, attended by both team members and management staff, are typically held on a monthly basis. They provide a forum for discussing emerging challenges, identifying areas of concern, and sharing ideas on how to improve working conditions and mutual support within teams.
- Another engagement mechanism is the Employee Relations Committee, which conducts formal proceedings in response to complaints submitted by ORLEN S.A. employees. The Committee operates with a multidisciplinary composition, including a Chair designated by the Executive Director for HR, legal advisor, the Ethics Officer, and, where indicated by the complainant or respondent, trade union representatives. As part of this mandate, the Ethics Officer may consult with trade union representatives on the resolution of individual cases. The frequency of the Committee's activities is determined by the volume of submitted complaints. Following each review, the Committee formulates recommendations, based on which the employer takes a final decision, with the outcome formally communicated to the parties in writing.

- In late 2025, ORLEN S.A. established a DEI (Diversity, Equity & Inclusion) Champions network, aimed at embedding a culture of openness, and respect for diversity across the organisation. The DEI Champions actively support initiatives designed to promote equal treatment and an inclusive workplace environment, where every employee feels valued and empowered. Through their engagement, educational and awareness-raising initiatives are developed, strengthening a culture of dialogue, collaboration, and openness to diverse perspectives. The DEI Champions convene on a monthly basis. The ORLEN Group also engages with trade unions, gathering feedback on the perceived value of pay and benefit packages. Employee feedback (expressed directly or through trade unions) is a crucial aspect considered in taking management decisions and actions that pertain to social dialogue and collective bargaining. Outcomes of these consultations inform the relevant adjustments to internal regulations, pay agreements, and working conditions. Formal consultations between the employer and trade unions are conducted through regular annual meetings. This structured social dialogue underpins the protection of workers' rights and supports our effective commitment to fundamental human rights.
- In consultations regarding occupational health and safety at the ORLEN Group, the workforce side is represented by workers' representatives and trade unions. These representatives actively participate in the development and review of key OHS aspects, including occupational risk assessments, allocation standards to determine employee entitlements to protective clothing and footwear and to prophylactic meals and beverages, scope of the basic medical care for employees, and measures to enhance workplace safety. They are also involved in activities of the OHS Committees, which convene on a quarterly basis.
- Engagement with our own workforce is further maintained via satisfaction surveys conducted across the ORLEN Group. These surveys, administered periodically in the form of questionnaires, provide valuable insights into the experience and expectations of our employees. In 2025, they covered 20 Group companies. Feedback gathered through employee satisfaction surveys informs targeted solutions that are implemented to improve the conditions of work and employment, safeguard employee well-being, and streamline organisational processes.
- At ORLEN S.A., we operate a dedicated email channel (bezbarier@orlen.pl), which enables people in our own workforce to submit queries, ideas and suggestions related to disability, accessibility or neurodiversity.

### 6.8.3 Processes to remediate negative impacts and channels for own workers to raise concerns [S1-3]

At the ORLEN Group, we have established a comprehensive framework for the identification of impacts on our own workforce, and for the prevention and remediation of material negative impacts associated with working conditions. This framework is underpinned by active dialogue with our employees, engagement with trade unions and workers' representatives, and the availability of multiple channels for raising concerns. These channels operate both offline and online, and some are available in local languages to ensure accessibility across geographies. The ORLEN Group has additionally implemented a formal grievance mechanism to ensure the prompt and equitable handling of employee submissions.

Detailed information on the grievance mechanisms and channels available to ORLEN Group employees for reporting concerns is provided in disclosure ESRS G1: **Model for reporting and analysing enquiries, concerns and violations with respect to the ORLEN Group's core values and standards.**

The principal reporting channels include:
- internal reporting system for submitting concerns,
- system for reporting hazards and incidents of concern,
- dedicated drop boxes,
- dedicated email addresses for specific subject areas,
- telephone,
- traditional letters,
- Ethics Officer.

All these channels have been established internally, with oversight of their effective operation assigned to Directors responsible for the respective functional areas.

**Follow-up actions upon receipt of a report include:**
- obtaining additional information, where necessary, from the whistleblower or reporting individual,
- collecting sufficient evidence,
- assessing credibility of the reported concern,
- proposing recommendations and determining whether immediate action is required to prevent an imminent incident.

Within a period of up to three months from the receipt of an internal report, the personnel responsible for follow-up actions are required to conclude the process and submit a report to the relevant Director. Such report must include their findings, conclusions, recommendations, and – where applicable – an estimate of economic damage sustained as a result of the identified violation. Employee awareness of the existing channels for raising concerns and grievance mechanisms is strengthened through regular training (including onboarding sessions, mandatory training, preventive meetings, and dedicated consultations under the #Ethical ORLEN initiative), as well as internal communication campaigns (via our corporate intranet and the Ethics Days). In addition, employees have access to

dedicated e-learning modules covering the Whistleblower Protection Policy. At the ORLEN Group, we have a strict zero-tolerance approach to retaliation. Our Whistleblower Protection Policy, as described under disclosure S1-1, explicitly prohibits any form of retaliatory action. In addition, the provisions of our Code of Ethics ensure protection for all individuals who raise concerns or submit grievances.

### 6.8.4 Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions [S1-4]

The measures we take in connection with material impacts, risks and opportunities related to our own workforce are ongoing in nature and have no defined completion date. Accordingly, no time horizons have been specified in the description of these measures.

#### Actions taken to prevent material negative impacts

Health and safety

Work in production environments involves exposure to factors that may affect the health and safety of workers. Key workplace conditions include exposure to noise, vibration, chemical and electrical hazards, dust, extremely high or low temperatures, shift work, and the operation of machinery and equipment. This calls for continuous monitoring of the working environment and identification of specific workplace hazards as an essential precaution. To mitigate negative impacts associated with working conditions in production areas, we have implemented a comprehensive set of preventive and organisational measures, including in particular:

- provision and use of appropriate personal protective equipment (PPE), such as protective clothing and footwear, as well as hearing, respiratory and eye protection devices, in accordance with the defined allocation standards,
- organisation and delivery of occupational health and safety training (at induction and periodically thereafter), supplemented by specialised training in first aid, safe work practices and similar topics,
- implementation of technical and organisational controls to reduce workers' exposure to hazardous factors, including the modernisation of technical facilities, process automation, and improvements in workplace ergonomics,
- provision of prophylactic meals and beverages in conditions involving increased physical exertion, strain or adverse microclimate,
- operation of OHS Committees and the Social Labour Inspectorate, which support oversight of working conditions and initiate safety improvement measures,
- ongoing consultation with workers' representatives and trade unions on occupational risk assessments, the organisation of work, and proposed changes affecting workplace safety.

Where an occupational accident occurs, the accident investigation report sets out conclusions and preventive recommendations to be implemented by the employer's representative (typically the injured employee's direct supervisor), to help prevent similar incidents in the future. This helps improve safety both for the injured employee and for others working in the area. Depending on the circumstances of the case, employees who have suffered a workplace accident, an accident while commuting to or from work, or an occupational disease, may also apply for additional financial assistance in the form of a hardship grant. In justified cases, further support may be provided by the ORLEN Group's foundations under their programmes, in line with their constitutive documents and internal rules. We also give employees the option to join additional medical care schemes, providing access to a broad range of healthcare services, including specialist consultations.

Gender equality and equal pay for work of equal value

Given the specific characteristics of our industry, marked by a high proportion of technical roles and elevated operational risk, it is particularly important to ensure equal treatment of workers, including gender equality and equal pay for work of equal value. At the ORLEN Group, we conduct regular analyses of remuneration structures by gender, job position, organisational unit, and grading level. These analyses are intended to identify potential pay gaps, eliminate unjustified disparities, and enhance the transparency of remuneration policies. In 2024, the gender pay gap was calculated exclusively for ORLEN S.A., and stood at -0.62%. In 2025, the gap calculated based on 78% of the Group's employees was -3%.

Measures against violence and harassment in the workplace

We apply a systematic, multi-level approach to preventing violence and harassment in the workplace, including policies, procedures, training, safe reporting channels and ethical oversight. In 2025, ORLEN S.A. introduced mandatory training for all employees on preventing workplace bullying, discrimination and all forms of harassment, and all Group companies have six months to implement this requirement. At the same time, specialised training is being provided for managers on identifying and preventing workplace bullying, discrimination and harassment, alongside webinars on inclusive language. Ethics Officers are appointed each year in further Group companies. In 2025, the ORLEN Group provided remedies to affected employees in the form of professional psychological support (including consultations and psychologist on-call hours at the Psychological Assessment and Support Unit), with full confidentiality and anonymity ensured. Employees also had access to additional medical care, under which they could receive mental health support. A total of 350 psychological support sessions, amounting to 696 hours, were delivered for ORLEN S.A. employees, their immediate family members and employees of Group companies.

## Actions taken to advance material positive impacts

### Secure employment

We provide employees with a broad range of social protection arrangements, encompassing solutions implemented in line with applicable laws or based on rules adopted at company level, e.g. under collective labour agreements or company social benefit funds. These include medical care, such as subscription-based healthcare, social benefits such as co-financing of holidays for employees and their family members, hardship assistance for employees facing difficult personal, family or financial circumstances, housing loans, and benefits for retirees and pensioners, such as subsidies for holidays or health resort stays.

### Working time

Flexible working arrangements have been implemented across the Group, including home office (on a fully remote or hybrid basis), in line with the Labour Code and as agreed with trade unions. Thanks to these flexible work models, our employees are better able to balance their working time around private and family life. These arrangements support work-life integration, enhancing employee satisfaction, engagement, and overall productivity.

### Adequate wages

We actively monitor pay trends prevailing on the market and benchmark them against internal compensation practices. Where justified, we optimise our practices, e.g. by amending the Collective Bargaining Agreements or internal Remuneration Rules, or propose targeted salary increases for critical talent. There are a number of trade unions at the Group, ensuring that appropriate compensation standards are maintained. Furthermore, annual pay consultations are held with employee representatives under the framework of Collective Bargaining Agreements.

### Social dialogue with employees

At the ORLEN Group, social dialogue with our employees is an ongoing process, maintained through trade unions and other communication channels. The Collective Bargaining Agreements formally define the circumstances, frequency, and forms of mandatory engagement with employees. The positive impact of social dialogue within our Group is reinforced through systematic engagement mechanisms that allow workforce members to meaningfully participate in shaping the working conditions and organisational decisions.

### Freedom of association, the existence of works councils and the information, consultation and participation rights of workers

The ORLEN Group hosts a number of trade unions actively involved in its operations and governance processes.

### Collective bargaining

A key factor reinforcing the positive impact of collective bargaining within the ORLEN Group is its grounding in a clear and well-established legal framework, encompassing the Constitution of the Republic of Poland, the Labour Code and the Act on Trade Unions. This ensures the predictability, transparency, and partnership-based approach to negotiations between the employer and trade unions. As a result, it fosters trust between the parties, reduces the risk of labour disputes, and supports stable employer–employee relations.

### Work-life balance of the workforce

At the Group, we offer a robust package of non-pay benefits, including social assistance in the form of subsidies towards holidays or health resort treatments, leisure activities for children and young people, rehabilitation stays for children with disabilities, or in-patient rehabilitation for employees. The Group’s employees are also provided with access to medical care and life insurance.

### Training and skills development

ORLEN Group employees are offered regular, mandatory training programmes, covering areas such as personal data protection, information security, occupational health and safety and the Code of Ethics, which supports a safe and responsible working environment. In addition, we offer a broad portfolio of development training opportunities, covering technical capabilities, systems, and language skills, aimed at enhancing our employees’ professional competencies. Tailored training programmes are also delivered to selected groups of workers, depending on identified needs.

### Diversity at the workplace

We actively promote diversity and inclusion across the ORLEN Group’s operations. Dedicated policies are in place, alongside initiatives such as the Diversity Charter and Diversity IN Check. As part of our commitment to diversity management, at ORLEN S.A. we carry out initiatives dedicated to the empowerment and inclusion of neurodivergent individuals and persons with disabilities. Our long-standing Accessible ORLEN programme is designed to foster a diverse, bias-free working environment. Within this initiative, an in-house support desk has been established, offering free advice on disability-related matters to our workforce members. The programme also features communication and education initiatives to raise awareness and understanding of disability inclusion. A dedicated email channel has been made available to workers, providing space to submit suggestions, raise questions, or propose initiatives related to disability issues.

## Actions taken to mitigate material risks

Risk of costs associated with non-compliance with OHS regulations – in response to this risk, the ORLEN Group has implemented a range of concrete and systemic mitigation measures. These include:

- Group-wide personal and process safety management system – a comprehensive framework covering occupational health and safety, fire safety, process safety, and the safe storage and transport of dangerous goods. Its purpose is to ensure consistent OHS and process safety standards across all Group companies, thereby reducing the risk of costs associated with regulatory breaches;
- introduction and application of the Group-wide safety framework, comprising the ORLEN Group Safety Standards and ORLEN Group Technical Standards. These standards harmonise OHS requirements across the Group, drawing on best practices identified within our companies as well as solutions adopted by leading industry peers. Their application reduces our exposure to financial penalties, claims, and operational disruptions resulting from regulatory non-compliance;
- regular OHS training supported by ongoing awareness-raising, information campaigns, and educational initiatives promoting safe behaviours among workers. These measures form an integral part of our risk management approach;
- monitoring of safety performance metrics and KPIs – the ORLEN Group keeps track of key performance indicators related to workplace incidents involving both our employees and contractors, with the data used to assess the effectiveness of OHS initiatives and to identify emerging risk areas at an early stage, before they translate into adverse financial or legal consequences;
- root cause analysis of accidents and near-miss events – ORLEN Group companies conduct detailed investigations into all workplace incidents, supported by a standardised Group-wide methodology, which informs the implementation of targeted preventive measures;
- long-term OHS planning at the Group level – overall strategic priorities are defined across the ORLEN Group, aligned with the ORLEN Group Sustainable Development Strategy for 2025–2035.

Through this strategic approach, the risk of costs that could arise from non-compliance with OHS regulations is systematically managed rather than addressed on an ad hoc basis.

Risk of personal data breaches affecting employees – to mitigate this risk, ORLEN S.A. has implemented a comprehensive set of measures aimed at strengthening the security and governance of personal data processing. Key ones include the identification and assessment of risks involved in data processing activities, including the performance of risk assessments and data protection impact assessments (DPIAs). Appropriate technical and organisational safeguards are put in place to mitigate the identified risks, subject to regular monitoring, audits, and inspections. We also provide training on personal data protection and ensure continuous oversight by the Data Protection Officer and Data Protection Team. In addition, we have established procedures for managing data security incidents and breaches, defined data retention rules and put in place mechanisms ensuring the effective exercise of data subjects' rights. Collectively, these measures are designed to reduce the risk of breaches affecting the confidentiality, integrity, and availability of personal data.

## Actions taken to pursue material opportunities

Greater attractiveness as an employer in the labour market – reputation as a stable employer

Since 2011, ORLEN S.A. has consistently held the Top Employer Poland title. The Top Employers certification programme is an annual, globally recognised assessment that rigorously evaluates companies and their human resources management practices. Employers are certified by the Top Employers Institute experts based on the HR Best Practices Survey scrutinising their people practices. The questionnaire covers 20 areas, including people strategy, work environment, talent acquisition, training and learning, well-being, diversity and inclusion. Based on a globally standardised methodology, the certification delivers an objective assessment that supports organisations in systematically raising the bar on their HR practices. Our HR activities are focused on employment stability and long-term career progression, which constitute key drivers of our competitive advantage in the labour market, particularly in a volatile economic environment. We also ensure high standards of occupational safety and run systematic surveys to gauge employee satisfaction levels. Our consistent employer branding efforts support the effective attraction and retention of talent, further reinforcing the Group's competitive edge in the labour market.

Greater attractiveness as an employer in the labour market supported by fair pay and benefits

We apply adequate, market-aligned remuneration processes and procedures, complemented by a competitive portfolio of non-pay benefits. These measures are designed to drive workforce motivation while reinforcing the Group's positioning as a stable and attractive employer.

Improved productivity and operational efficiency through fostering comfort, trust and transparent employer-employee relations

At the ORLEN Group, we systematically pursue initiatives aimed at fostering a workplace environment characterised by trust, psychological comfort and transparent employer–employee relations, which represents a material opportunity to enhance productivity and operational efficiency. These include the monitoring of employee engagement and satisfaction levels, provision of flexible working arrangements, and deployment of policies supporting employee well-being, further reinforced by transparent and formalised employment frameworks, including the Collective Bargaining Agreements, structured social dialogue, and initiatives revolving around ethical conduct, anti-discrimination, and

diversity management. In parallel, continuous improvements to our HR and operational processes help strengthen the sense of security, partnership and employment stability in our workforce, translating into enhanced organisational effectiveness and overall Group performance.

Increased competitiveness and revenue through skills development and workforce specialisation

We offer training opportunities and deploy a range of learning mechanisms and tools to continually raise employee competencies. The focus areas are upskilling, fostering professional specialisation, and aligning workforce capabilities with technological advances and evolving market requirements. The initiatives we implement include continuous expansion of our development training and mentoring programmes, combined with the application of mechanisms intended to support career progression, including transparent professional development and promotion criteria. These are designed to strengthen specialist skills, enhance individual and organisational performance, and optimise the utilisation of human capital in delivering the Group's strategic objectives.

The effectiveness of these actions during the reporting period was assessed through:

- 15 preventive visits carried out at various ORLEN Group companies in the fourth quarter of 2025, following the launch of the new M1T2 Preventive Visits standard. The visits resulted in 207 recommendations, with progress on their implementation tracked in the recommendations register;
- Safety Culture Indicator, introduced as an additional performance metric to help identify improvement opportunities in safety management;
- safety incident classification procedure developed to further enhance safety performance metrics;
- regular preventive meetings – four meetings were held in 2025 with 54 participants;
- training on preventing workplace bullying, discrimination and harassment, the Code of Ethics and human rights protection, delivered in 43 Group companies;
- employee satisfaction surveys carried out at 20 Group companies.

The effectiveness of these actions, including efforts to advance positive impacts, is reflected in the Top Employer title, which ORLEN has received continuously for the past 15 years.

When reporting positive outcomes of initiatives addressed to our own workforce, we focus primarily on the scope and scale of the measures undertaken. At this stage, no distinction is made between evidence that specific actions have been implemented from evidence of actual outcomes for the people concerned, as measuring direct, long-term outcomes for employees, such as changes in behaviour, skills or financial situation, requires separate research tools, time and methods based on self-assessment, which have not yet been implemented across the Group.

We did not identify any instances where our own practices, including those related to procurement, sales and data use, had caused or contributed to material negative impacts on our own workforce.

During the reporting period, we identified no material operating expenditures or capital expenditures related to own workforce.

### 6.8.5 Targets related to managing material negative impacts, advancing positive impacts, and managing material opportunities [S1-5]

We have not defined measurable, time-bound and outcome-oriented targets for all material impacts, risks and opportunities. We plan to set such targets over the medium term.

Ambitions related to managing our own workforce are embedded in the ORLEN Group Sustainable Development Strategy for 2025–2035. Their comprehensive list is presented in the narrative disclosures under ESRS 2.

Under the Employees pillar of the Sustainable Development Strategy, we have set ambitions focusing on building a safe, inclusive and development-oriented working environment that supports the delivery of the Group's long-term business objectives. A key priority is the steady improvement of occupational health and safety, including the further reduction of accident rates and the strengthening of the safety culture across the organisation. At the same time, the Strategy ambitions provide for measures to support employee well-being, covering physical and mental health, work-life balance, and building employee engagement and job satisfaction.

Our employee-related ambitions are focused on developing skills and human capital in a way that responds to the challenges of the energy transition and technological change, including upskilling and reskilling programmes.

Mitigation of negative impacts on our own workforce is supported by the following ambitions defined under the strategy:

- stabilise and consistently reduce TRIR (< 0.2);
- enhance occupational safety systems for employees and contractors within ORLEN Group companies;
- implement the guidelines outlined in the Declaration on Prevention of Major Industrial Accidents across the ORLEN Group.

Advancing of positive impacts on our own workforce is supported by the following ambitions defined under the strategy:

- introduce health programmes for all ORLEN Group employees, covering both physical and mental well-being,
- grow employee satisfaction/engagement levels,
- expand the employee development training portfolio,
- expand the mentoring programme for employees.

- expand the selection of non-pay benefits for employees.

The ambitions set out above were defined for 2026, and further ahead for 2030 and 2035. Reviewing these ambitions, and assessing whether progress remains in line with the plans, will form the first stage of evaluating their implementation, scheduled for 2026.

The indicator that is regularly monitored at Group level and across individual companies is TRIR (Total Recordable Incident Rate, calculated as the number of recordable lost time injuries involving employees and contractors * 200,000) / total hours worked by employees and contractors in the period). In 2025, the ORLEN Group's TRIR was 0.24, below the baseline TRIR of ≤ 0.34. In 2024, it stood at 0.26. TRIR is monitored monthly and annually, and is one of the key performance indicators used to assess the effectiveness of occupational health and safety measures. The level achieved in 2025 is consistent with the ORLEN Group's long-term objective of reducing the accident rate to a TRIR below 0.2 by 2030, through the consistent implementation of uniform OHS standards and the strengthening of safety culture across the Group.

### 6.8.6 Characteristics of the undertaking's employees [S1-6]

In 2025, our employment policy was focused on recruiting top-tier professionals to support both the Group's daily operational activities and strategic project implementation. Headcount reductions took place primarily at the Unipetrol Group, specifically at Spolana (due to currently prevailing conditions in the chemical industry and the closure of two structurally unprofitable production lines), at ORLEN Hungary (as a result of changes to the service station operating model), and at the Exalo Drilling Group (reflecting the alignment of personnel costs with the evolving operating model and order portfolio). This led to a year-on-year decrease in the ORLEN Group's total headcount of employees by 1,246, to 66,563.

The number of employees broken down by gender is calculated based on the total headcount disaggregated by gender. The total headcount comprises all individuals with employment contracts, i.e. both active and inactive employees, including those on long-term leave (e.g. maternity or childcare leave). The number of employees is determined at the end of the reporting period, i.e. 31 December 2025.

Table 106 Number of employees at the end of the reporting period broken down by gender

| Gender | 2025 | 2024 | Difference |
|---|---|---|---|
| Women | 18,298 | 18,856 | -558 |
| Men | 48,265 | 48,953 | -688 |
| **Total** | **66,563** | **67,809** | **-1,246** |

The data is provided as the headcount of employees with employment contracts at the end of the reporting period.

Table 107 Number of employees at the end of the reporting period broken down by country

| Country | 2025 | 2024 | Difference |
|---|---|---|---|
| Poland | 57,277 | 57,242 | 35 |
| **ORLEN Group** | **66,563** | **67,809** | **-1,246** |

The data is provided as the headcount of employees with employment contracts at the end of the reporting period.

Table 108 Number of employees at the end of the reporting period broken down by contract type

| Gender | 2025 | 2024 |
|---|---|---|
| **Number of permanent employees (headcount)** | | |
| Women | 16,293 | 16,796 |
| Men | 43,316 | 43,534 |
| **Total number of employees** | **59,609** | **60,330** |
| **Number of temporary employees (headcount)** | | |
| Women | 2,005 | 2,060 |
| Men | 4,949 | 5,419 |
| **Total number of employees** | **6,954** | **7,479** |
| **Number of non-guaranteed hours employees (headcount)** | | |
| Women | 0 | 0 |
| Men | 0 | 0 |
| **Total number of employees** | **0** | **0** |
| **Number of full-time employees (headcount)** | | |
| Women | 17,911 | 18,396 |
| Men | 47,978 | 48,568 |
| **Total number of employees** | **65,889** | **66,964** |
| **Number of part-time employees (headcount)** | | |
| Women | 387 | 460 |
| Men | 287 | 385 |
| **Total number of employees** | **674** | **845** |

The data is provided as the headcount of employees with employment contracts at the end of the reporting period.

During the reporting period, 6,915 employees left the ORLEN Group, resulting in an employee turnover rate of 10.4%. In 2024, there were 5,978 departures, with an employee turnover rate of 8.8%. The turnover rate was calculated by dividing the number of employee departures during the year by the total number of employees at the end of the reporting period.

As at the end of 2025, the ORLEN Group had 66,563 employees with employment contracts, which was the most representative measure of the workforce size reflected in employee benefits expense in the financial statements (see Note 11.3).

For the total number of employees by contract type and region, refer to disclosure ESRS 2.

The measurement of these metrics has not been validated by an external body.

### 6.8.7 Employment conditions [S1-8] [S1-10] [S1-11] [S1-14] [S1-15]

#### Social protection [S1-11]

All individuals in the ORLEN Group's workforce with employment contracts are covered by statutory social protection against loss of income, in accordance with the generally applicable legal frameworks of the respective jurisdictions. All employees are protected against loss of income resulting from illness, unemployment, workplace accidents and acquired disability, parental leave, or retirement.

The measurement of this metric has not been validated by an external body.

#### Work-life balance [S1-15]

In this Sustainability Statement for 2025, we updated the methodology for presenting the ORLEN Group's data concerning family-related leave. In the 2024 statement, the relevant disclosures covered only statutory leave (under the Labour Code) granted to permanent employees in connection with the birth of a child (maternity and parental leave), provided that such leave had been reported to the employer.

In 2025, that definition was extended to include:

- paternity leave,
- carers' leave (granted not only for childcare but also for the care of other family members),
- non-statutory entitlements arising from the Group's internal regulations, including Collective Bargaining Agreements, policy documents and other internal rules.

As a result of the revised definition and identification of incomplete data in the 2024 statement, we decided to restate the comparative data.

Table 109 Percentage of employees entitled to family-related leave and employees that took family-related leave

| Category | 2025 | | | 2024 (restated) | | | | 2024 (as reported in the Sustainability Statement) | |
|---|---|---|---|---|---|---|---|---|---|
| | Women | Men | Total | Kobiety | Women | Men | Total | Mężczyźni | Women |
| Number of employees | 18,298 | 48,265 | **66,563** | 18,856 | 48,953 | **67,809** | 18,856 | 48,953 | **67,809** |
| Number of employees entitled to family-related leave | 17,535 | 47,117 | **64,652** | 18,183 | 48,246 | **66,429** | 1,300 | 2,592 | **3,892** |
| Number of employees that took family-related leave | 8,454 | 19,209 | **27,663** | 8,298 | 19,134 | **27,432** | 820 | 572 | **1,392** |
| Percentage of employees entitled to family-related leave | 95.83% | 97.62% | **97.13%** | 96.43% | 98.56% | **97.96%** | 6.89% | 5.29% | **5.74%** |
| Percentage of employees that took family-related leave | 46.20% | 39.80% | **41.56%** | 44.01% | 39.09% | **40.45%** | 4.35% | 1.17% | **2.05%** |

The measurement of these metrics has not been validated by an external body.

#### Adequate wages [S1-10]

All employees of the ORLEN Group are adequately remunerated, in line with the applicable reference benchmarks. We apply a consistent approach to assessing the adequacy of wages, with statutory minimum wages in each jurisdiction of our operations as the primary reference point. Within the European Economic Area (EEA), the applied benchmarks are aligned with the requirements of Directive (EU) 2022/2041 on adequate minimum wages in the European Union. All people in the workforce covered by the 2025 statement had employment contracts, which ensures compliance with the statutory requirements regarding minimum wage levels and transparency of remuneration mechanisms.

In addition, companies of our Group implement consistent and formalised remuneration systems based on Collective Bargaining Agreements or Remuneration Rules. These frameworks define job grades and corresponding pay levels aligned with competencies, scope of responsibilities, and job complexity. These mechanisms ensure consistent remuneration policies across the Group, help eliminate unjustified pay disparities, and enhance wage-setting transparency.

The measurement of this metric has not been validated by an external body.

#### Collective bargaining coverage and social dialogue [S1-8]

At the ORLEN Group, 77.10% of employees are covered by Collective Bargaining Agreements. Within the European Economic Area (EEA), the coverage rate stands at 77.47%, while outside the EEA it is 6.8%.

The percentage of workforce represented by employee representatives in EEA countries amounts to 98.10% through trade unions, and 99.83% through the European Works Council.

The European Works Council functions as a formal employee representation body, enabling staff participation in matters concerning our Group's operations. It serves as a platform for sharing information on all significant aspects of the Group's operations, and consulting decisions with cross-border implications for employees. The ORLEN Group European Works Council was established in accordance with Polish legislation – specifically, the Act of 5 April 2002 on European Works Councils. Its members are elected or appointed by eligible entities, i.e. trade unions or employees themselves.

A detailed country-by-country breakdown is presented in the table below.

Table 110 Collective bargaining coverage and social dialogue in 2025

| Coverage rate | Collective bargaining coverage | | Social dialogue – trade unions | Social dialogue – European Works Council |
|---|---|---|---|---|
| | Employees – EEA | Employees – Non-EEA | Workplace representation (EEA only) | |
| 0-19% | | | | |
| 20-39% | | | | |
| 40-59% | | | | |
| 60-79% | | | | |
| 80-100% | Poland* | | Poland* | Poland* |

* For countries where the ORLEN Group has >50 employees representing >10% of the total number of employees.

The measurement of these metrics has not been validated by an external body.

## Health and safety metrics [S1-14]

The ORLEN Group makes use of the option to omit information regarding non-employee persons constituting its own workforce resources, which is subject to disclosure under S1-14.

For disclosure (S1) 88e on employees, we decided to restate the comparative data, as the disclosure on the number of days lost due to work-related injuries in 2024 in connection with work-related accidents that occurred in 2023 was incomplete.

### Occupational health and safety management system

Ensuring safe and healthy working conditions represents a core priority of responsible operational management within the ORLEN Group. Given the scale of our operations, varied technological settings and the presence of work in high-risk environments, occupational health and safety (OHS) considerations span multiple areas and form an integral part of our day-to-day operational management. Within the ORLEN Group companies, structured occupational health and safety (OHS) management systems are in place, developed in accordance with internal policy documents and operational instructions, and fully compliant with the requirements of national legal regulations. They are subject to central-level review through preventive visits conducted by ORLEN S.A. At the ORLEN Group level, we have implemented a coherent and comprehensive policy-based approach to occupational safety management, as described in disclosure S1-1.

The table below presents our approach to monitoring the effectiveness of the OHS management system across the ORLEN Group.

Table 111 Safety management systems

| Percentage of ORLEN Group employees | 2025 | 2024 |
|---|---|---|
| covered by the undertaking's health and safety management system based on legal requirements and/or recognised standards or guidelines | 99% | 81% |
| covered by the health and safety management system based on legal requirements and/or recognised standards or guidelines and which has been internally audited and/or audited or certified by an external party | 88% | 72% |

Table 112 Effectiveness of the occupational health and safety management system at the ORLEN Group

| ESRS | | Unit of measure | 2025 | 2024 (restated) | 2024 (as reported in the Sustainability Statement) |
|---|---|---|---|---|---|
| **Employees** | | | | | |
| (S1) 88b<br>(S1) AR82 | Number of individuals affected by fatal work-related injuries | number | 1 | 2 | 3 |
| (S1) 88c | Number of individuals affected by lost time injuries (LTI), including fatalities | number | 163 | 234 | 247 |
| (S1) 88c | Rate of lost time injuries (LTI), including fatalities | number / 1 million man-hours worked* | 1.50 | 2.13 | 2.04 |
| (S1) 88c | Rate of lost time injuries (LTI), including fatalities | number / 200 thousand man-hours worked* | 0.30 | 0.43 | 0.41 |
| (S1) 88d | Number of acknowledged occupational diseases | number | 3 | 2 | 2 |
| (S1) 88e | Number of days lost due to work-related injuries | number | 9,720 | 14,818 | 14,706 |
| **Contractors** | | | | | |
| (S1) 88b<br>(S1) AR82 | Number of individuals affected by fatal work-related injuries | number | 0 | 2 | 2 |
| (S1) 88c | Number of individuals affected by lost time injuries (LTI), including fatalities | number | 38 | 49 | 49 |

| ESRS | | Unit of measure | 2025 | 2024 (restated) | 2024 (as reported in the Sustainability Statement) |
|---|---|---|---|---|---|
| (S1) 88c | Rate of lost time injuries (LTI), including fatalities | number / 1 million man-hours worked* | 0.35 | 0.48 | 0.48 |
| (S1) 88c | Rate of lost time injuries (LTI), including fatalities | number / 200 thousand man-hours worked* | 0.07 | 0.10 | 0.10 |
| **Employees and contractors total** | | | | | |
| (S1) 88b<br>(S1) AR82 | Number of individuals affected by fatal work-related injuries | number | 1 | 4 | 5 |
| (S1) 88c | Number of individuals affected by lost time injuries (LTI), including fatalities | number | 201 | 283 | 296 |
| (S1) 88c | Rate of lost time injuries (LTI), including fatalities | number / 1 million man-hours worked* | 0.93 | 1.33 | 1.32 |
| (S1) 88c | Rate of lost time injuries (LTI), including fatalities | number / 200 thousand man-hours worked* | 0.19 | 0.27 | 0.26 |

* Representative number of man-hours for the companies.

A harmonised classification system for Medical Treatment Cases (MTC) and First Aid Cases (FAC) was implemented across the ORLEN Group at the end of 2025, with full data collection under this framework due to commence in 2026. Accordingly, for the 2025 reporting period, we only disclosed work-related injuries resulting in lost time (LTI), excluding incidents without recorded absence (MTC, FAC). The number of MTC-classified incidents that occurred in 2025 will be disclosed in the 2026 statement as restated comparative data to ensure comparability with the 2026 data. Within this scope, we record and monitor both fatal workplace accidents and lost time work-related injuries (LTI). Compared with 2024, 2025 saw a decrease in the rate of lost time injuries (LTI), including fatalities, aggregated across our employees, own workforce, and contractors. This reduction was driven by a lower number of lost time injuries. In 2025, one fatal work-related injury involving an employee of an ORLEN Group company was recorded. For all work-related accidents, preventive actions are defined and detailed analyses are conducted, including root cause identification and the implementation of corrective measures. Additionally, regular meetings of OHS function representatives across the ORLEN Group are held to review the results of accident investigations and share lessons learned.

## Information on the reporting methodology

To effectively manage occupational health and safety (OHS) and related risks at the ORLEN Group, we have introduced a structured categorisation distinguishing between:

- employees, i.e. individuals employed at the ORLEN Group under employment contracts;
- contractors, i.e. employees of external companies performing work for ORLEN Group companies, such as on-site maintenance services or project-related tasks. Contractors also include employees of service stations operated by Group entities, including: ORLEN S.A., and ORLEN Unipetrol RPA - Benzina.

**The number of individuals affected by fatal work-related injuries** refers to the number of workplace accidents resulting in a fatality – whether the victim was an employee or a contractor – where the death occurred within six months from the date of the accident.

**The number of individuals affected by lost time injuries (LTI), including fatalities** is the number of workplace accidents acknowledged by the employer (being accidents caused by an external factor) which resulted in lost time or death due to work-related injuries or ill health. These data does not include commuting accidents (i.e. accidents occurring on the way to or from work).

**The number of Medical Treatment Cases (MTC)** refers to workplace accidents resulting from work-related injuries or ill health that required medical treatment beyond first aid, without resulting in lost time.

**The number of First Aid Cases (FAC)** refers to workplace accidents that required first aid treatment only due to work-related injuries or ill health, without resulting in lost time.

**The rate of lost time injuries (LTI), including fatalities** is calculated in accordance with the following formula: Number of individuals affected by lost time injuries (LTI), including fatalities, multiplied by 1,000,000, and then divided by the number of man-hours worked.

**The number of man-hours** refers to actual hours worked, excluding sick leave and vacation days. For employees, this figure is derived from the HR and payroll systems. For contractors, hours worked are calculated based on contract terms or service acceptance documentation. Where time-tracking systems are unavailable, estimated values may be used. This applies also to a minor share of man-hours worked for employees at certain ORLEN Group companies.

**The number of acknowledged occupational diseases** reflects official decisions issued by state authorities confirming work-related illnesses in individuals currently or previously employed by ORLEN Group companies. Such diseases are directly attributable to harmful factors in the work environment or the nature of work performed.

**The number of days lost due to work-related injuries** captures the total number of days of sick leave taken as a result of work-related injuries or illnesses.

The measurement of these metrics has not been validated by an external body.

### 6.8.8 Persons with disabilities [S1-12]

Table 113 Percentage of employees with disabilities

| Gender | Percentage of employees | |
|---|---|---|
| | 2025 | 2024 |
| Women | 2.99% | 2.80% |
| Men | 1.52% | 1.37% |
| **Total** | **1.93%** | **1.77%** |

* At the end of the reporting period based on S1-6.

The figures reflect the total number of employees who have officially disclosed a disability to the employer, including all levels of disability.

The measurement of these metrics has not been validated by an external body.

### 6.8.9 Diversity metrics [S1-9]

Table 114 Gender representation in top management*

| Gender | 2025 | | 2024 | |
|---|---|---|---|---|
| | Number of employees (headcount) | Percentage of employees | Liczba pracowników (liczba całkowita) | Number of employees (headcount) |
| Women | 299 | 32.12% | 242 | 31.97% |
| Men | 632 | 67.88% | 515 | 68.03% |
| **Total** | **931** | **100.00%** | **757** | **100.00%** |

* Top management refers to N-1 level directors, i.e. those reporting directly to the Management Board.

Table 115 Employees by age group

| Age group | 2025 | | 2024 | |
|---|---|---|---|---|
| | Number of employees* | Percentage of employees | Liczba pracowników* | Number of employees* |
| under 30 years old | 6,177 | 9.28% | 6,628 | 9.77% |
| 30–50 years old | 36,263 | 54.48% | 36,901 | 54.42% |
| over 50 years old | 24,123 | 36.24% | 24,280 | 35.81% |
| **Total** | **66,563** | **100.00%** | **67,809** | **100.00%** |

* At the end of the reporting period based on S1-6.

The measurement of these metrics has not been validated by an external body.

### 6.8.10 Remuneration metrics (pay gap and total remuneration) [S1-16]

Gender pay gap

The 2025 gender pay gap for the ORLEN Group stood at -3%, which means that women's pay was higher than men's pay. This disparity falls within the range defined in the Pay Transparency and Equal Pay Directive, namely ±5%. The ORLEN Group's gender pay gap is calculated using a benchmarking tool, employed both for market pay analysis and for consolidating data from different companies in order to calculate the pay gap. The gender pay gap was calculated as the difference between the average remuneration of men and women, divided by the average remuneration of men, and expressed as a percentage. The same methodology was applied in 2024 and 2025. The pay gap calculated for 2024 covered only employees of ORLEN S.A., whereas in 2025 it was based on data covering approximately 78% of the ORLEN Group's workforce.

Total remuneration

The calculation of the annual total remuneration ratio, comparing the remuneration of the highest-paid individual to the median of total annual remuneration of all other employees (excluding the highest-paid individual), for the entire ORLEN Group presents significant data collection challenges, stemming from the size and complexity of the Group, the number of employees across multiple entities, and, most importantly, the absence of a unified HR and payroll system.

The calculation covers all ORLEN Group subsidiaries operating across diverse geographic and business markets.

Accordingly, the metric for 2025 has been calculated using the methodology described below.

Annual total remuneration was determined on the basis of cost categories reported in the uniform financial consolidation system used across all ORLEN Group companies. At each company, it was calculated as the total cash remuneration paid to an employee during the reporting year, taking into account base salary, including sick pay, annual MBO bonuses, quarterly and monthly bonuses, other bonuses together with Christmas/Easter benefits, retirement and disability severance payments, shift allowances, long-service awards, one-off and special-purpose awards, the annual award, overtime pay and other payroll-related costs.

The calculation included cash components of remuneration paid for the reporting year, including amounts paid in January of the following year but relating to December of the reporting year. The only exception was MBO bonuses and the annual award. For the 2025 calculation, the amounts paid in 2025 were included, corresponding to bonuses for 2024, due to the payment timetable for these benefits (payments in June and July of the following year).

Items related to employee departures, such as severance payments on termination of employment and compensation under non-compete clauses, were excluded, as they concerned individual cases and could distort the comparability of the data.

Annual remuneration was calculated only for employees employed under employment contracts, regardless of how long they had been employed during the reporting year. For those who did not work for the full year, remuneration was annualised by dividing remuneration for the period worked by the number of months worked and multiplying the result by 12. This annualised amount was increased, where applicable, by the amounts actually paid in the form of benefits such as payment in lieu of untaken holiday, retirement or disability severance payments, and long-service awards.

For part-time employees, remuneration was converted to a full-time equivalent, including Christmas/ Easter benefits.

Methodology for determining the total remuneration metric

Given the global scale of our operations and the diversity of HR and payroll systems across jurisdictions, a consolidated weighted median approach has been applied:

- all total remuneration values (both the highest pay and the median for individual companies/sub-groups) have been converted into the ORLEN Group's reporting currency (PLN),
- the highest pay at the ORLEN Group has been taken as the total remuneration of the highest-paid individual identified in section 8.3. Remuneration of management and supervisory staff,
- given no access to individual-level payroll data (per capita raw data), a weighted median methodology based on employment levels has been applied. Median remuneration values for individual companies or sub-groups have been ordered in ascending sequence and assigned weights corresponding to the number of employees at each entity. The ORLEN Group median has been determined as the value corresponding to the median employee within this aggregated and weighted dataset.

The adopted methodology, based on the weighted median of entity-level medians, is recognised as the most reliable estimation approach for large corporate groups in the absence of a centralised payroll system. It eliminates statistical distortion that would otherwise arise from assigning equal weights to smaller advisory entities and large operational units. We note that the calculated median represents an estimate. The actual median, calculated on the basis of individual data for all employees, could differ marginally in the presence of extreme distributional asymmetries within subsidiaries. Nevertheless, the adopted methodology provides a high degree of confidence as to the order of magnitude of the reported metric. Based on the methodology described above, the annual total remuneration ratio of the highest-paid individual to the median annual total remuneration for all employees (excluding the highest-paid individual) is 20.90.

The measurement of these metrics has not been validated by an external body.

### 6.8.11 Training and skills development metrics [S1-13]

Information on training policies, current policy documents, co-financing rules, and ongoing development programmes is disseminated through publicly accessible communication channels within each Group company. Our employees are offered access to a diverse range of learning and development opportunities, including:

- soft skills development training,
- specialist (technical) training to deepen industry and expert knowledge,
- participation in conferences, seminars, and congresses,
- foreign language courses,
- higher education studies,
- coaching,
- e-learning programmes,
- mandatory training sessions.

At the ORLEN Group, we defines a performance review in line with the definition set out in ESRS. The percentage of employees that participated in regular performance and career development reviews as well as the average number of training hours have been calculated based on employment data presented in disclosure S1-6. Such analyses for employees of the ORLEN Group have been conducted since 2025.

Table 116 Employees participating in regular performance and career development reviews at the ORLEN Group

| Gender | Percentage of employees that participated in regular performance and career development reviews | | Average number of training hours | |
|---|---|---|---|---|
| | 2025 | 2024* | 2025 | 2025 |
| Women | 72.0% | N/A | 20.3 | N/A |
| Men | 75.2% | N/A | 26.3 | N/A |
| **Total** | **74.4%** | **N/A** | **24.7** | **N/A** |

* Data for 2024 were not collected for the ORLEN Group

The measurement of these metrics has not been validated by an external body.

### 6.8.12 Incidents, complaints and severe human rights impacts [S1-17]

At the ORLEN Group, we monitor and analyse incidents, complaints, breaches of the Code of Ethics, and severe negative human rights impacts in relation to our own workforce.

In 2025, we monitored work-related incidents of discrimination on the grounds of gender, racial or ethnic origin, nationality, religion or belief, disability, age, sexual orientation, or other relevant forms of discrimination involving internal and/or external stakeholders across operations in the reporting period. This also includes cases of harassment as a specific form of discrimination.

Such analyses, covering employees of the ORLEN Group, have been conducted since 2025.

Table 117 Incidents, complaints and severe human rights impacts

| Metric | UoM | 2025 | 2024* |
|---|---|---|---|
| total number of incidents of discrimination, including harassment, reported in the reporting period | [number] | 11 | N/A |
| *total number of substantiated incidents of discrimination, including harassment* | *[number]* | *4* | *N/A* |
| number of complaints submitted through channels for raising concerns in relation to matters specified in ESRS S1 paragraph 2, excluding those reported above | [number] | 162 | N/A |
| total amount of fines, penalties, and compensation for damages as a result of incidents and complaints disclosed above | [PLN] | 0 | N/A |

* Data for 2024 were not collected for the ORLEN Group.

In 2025, no complaints relating to activities of the ORLEN Group companies were submitted to the OECD National Contact Point. The ORLEN Group did not identify any cases of severe human rights incidents, including forced labour, human trafficking, or child labour.

The measurement of these metrics has not been validated by an external body.

## 6.9 Workers in the value chain [ESRS S2]

### Interests and views of stakeholders [S2.SBM-2]

The interests and views of stakeholders significantly influence the ORLEN Group's strategy and business model. Our activities reflect a strong commitment to sustainable development and respect for human rights throughout our supply chain.

Based on the double materiality assessment, we identified material impacts on workers in our value chain. One of the key areas addressed in our Sustainability Strategy is ensuring contractor safety, in line with the safety standards applied to our own workforce. For details, see disclosure S1.

Consideration for the interests, views and rights of value chain workers is reflected in our Procurement Policy and the ORLEN Group Supplier Code of Conduct, with the latter serving as a key instrument in our collaboration with suppliers. The Code provides that suppliers are required to manage their workers and workplaces responsibly, which includes supporting skills development, ensuring workplace safety, and providing employees and contractors with a safe and fair working environment.

The ORLEN Group Supplier Code of Conduct also includes commitments relating to human rights, labour rights, environmental matters, and occupational health and safety. Our Anti-Corruption Policy, which suppliers are also required to accept when entering a procurement procedure, provides a mechanism for reporting any actions contrary to applicable laws. Matters concerning value chain workers are also governed by the terms of business relationships with suppliers, as set out in the contracts.

### Material impacts, risks and opportunities and their interaction with strategy and business model [S2.SBM-3]

Our business model is based on integrated operations across the entire value chain, including in particular:

- production and sourcing of raw materials,
- processing and production (refining, petrochemicals and power generation),
- logistics and distribution,
- wholesale and retail sales,
- extensive cooperation with contractors, suppliers and third parties.

This structure means that a significant part of our activities are carried out by individuals who are not part of our own workforce but work within the upstream and downstream segments of our value chain, often in environments involving increased operational risk.

Workers in our value chain are mainly individuals employed by our contractors and subcontractors, who perform work for the ORLEN Group but are not its own employees. They include in particular:

- employees of third-party companies carrying out technical, maintenance, construction and service work,
- individuals performing operational and logistics tasks at the ORLEN Group's process units and facilities,
- employees of companies providing transport, storage, support, and plant maintenance services,
- employees of third-party operated service stations,
- workers working in the operations of a joint venture or special purpose vehicles.

All workers in our value chain may potentially be exposed to negative impacts, which may be systemic (arising from the geographical location in which operations are conducted) or one-off in nature (resulting from specific incidents, such as loss of reputation by a supplier). Systemic impacts may occur in countries with the highest social risk where we identify value chain workers: Algeria, Saudi Arabia, Azerbaijan, Guyana, Kazakhstan, Nigeria, Norway, Poland, Russia, the United States and the United Kingdom. Supplies from Russia, exclusively via pipelines and not subject to international sanctions, continued in the first quarter of 2025.

We operate in an extensive multinational value chain. As part of a Group-level assessment of social impacts and risks relating to workers in the value chain, we identified no distinct groups of people with particular characteristics or facing greater risk of harm. No additional analyses have been undertaken in this area.

As a general principle, all workers in the value chain are subject to the same rules as the ORLEN Group's own workforce. Under the Supplier Code, all suppliers are required to ensure that value chain workers are treated in accordance with the guidance on working conditions, occupational health and safety, and human rights.

This disclosure does not cover all workers in our value chain who were engaged in active cooperation with the ORLEN Group during the reporting period. Given the scale of our operations, it is not currently possible to verify the entire value chain, which encompasses a wide range of occupations, including service station staff, tanker and LNG carrier crews, gas and electricity meter readers, cleaning personnel, IT professionals, lawyers, advisers. Some workers in our value chain are based in countries with elevated risk, which creates potential exposure related to non-compliance with labour or environmental requirements.

Our value chain is global in nature, and our suppliers are based in various regions of the world, including Europe, the Middle East, Asia, North America and South America. There is a risk that in some of these regions workers' rights may not be respected. In the current reporting period, we did not identify any material impacts in our value chain associated with a significant risk of child labour or forced or compulsory labour.

Suppliers, subcontractors and business partners are one of our key stakeholder groups and the most relevant group in the context of value chain worker considerations. As part of the double materiality assessment, the interests of this stakeholder group are taken into account in the assessment of impacts, risks and opportunities. The results of the double materiality assessment are reflected in our sustainability strategy.

The double materiality assessment identified negative impacts and risks relating to workers in our value chain. The risks are systemic in nature and relate primarily to safe working conditions. They arise from operating in high-risk countries and concern potential breaches of workers' rights, as well as potential costs associated with non-compliance with occupational health and safety requirements.

The negative impacts result from the fact that suppliers may only declare compliance with regulations with respect to workers in the value chain, without this being verified in practice, while we do not monitor their compliance in areas such as working time, adequate pay, social dialogue or occupational health and safety. At present, we do not conduct direct opinion surveys among workers in the value chain. We plan to implement engagement practices as part of the rollout of due diligence within five years.

The identified potential positive impacts include raising suppliers' sustainability awareness through training and consultations, as well as improving occupational health and safety knowledge among workers in our value chain. We are preparing to launch a series of conferences for suppliers, including a sustainability information panel.

## Table 118 Double materiality assessment summary for workers in the value chain [S2.IRO-1]

| Segment | Area | Geographical region | S2<br>Risk, opportunity, impact | Impact (I)<br>Risk (R)<br>Opportunity (O) | Positive (+)<br>Negative (-) | Actual (A)<br>Potential (P) | Value chain<br>Organisation (O)<br>Downstream (D)<br>Upstream (U) |
|---|---|---|---|---|---|---|---|
| Upstream & Supply, Downstream, Energy, Consumer & Products, Corporate Functions | Refining, Upstream, Energy, Petrochemicals, Gas, Retail, Corporate Functions | Globally | **Secure employment of value chain workers** | | | | |
| | | | Building suppliers' ESG awareness through training and advisory support | I | + | P | U, D |
| | | | Safe working conditions considerations linked to operating in high-risk countries | R | | | U, D |
| | | | Violations of workers' rights in the value chain | R | | | U, D |
| | | | **Working time of value chain workers** | | | | |
| | | | Limited influence on working time arrangements for value chain workers through the Supplier Code of Conduct, which supports the Group in selecting suppliers and subcontractors that declare adherence to due diligence principles | I | - | P | U, D |
| | | | **Adequate wages for value chain workers** | | | | |
| | | | Limited influence on remuneration practices for value chain workers | I | - | P | U, D |
| | | | **Social dialogue with value chain workers** | | | | |
| | | | Challenges in conducting social dialogue in the value chain | I | - | P | U, D |
| | | | **Health and safety of value chain workers** | | | | |
| | | | Limited influence on worker safety due to the nature of work performed in the value chain | I | - | P | U, D |
| | | | Building OHS knowledge among value chain workers through training and workshops | I | + | P | U, D |
| | | | Costs of non-compliance with health and safety requirements | R | | | U, D |

| | | short-term | medium-term | long-term |
|---|---|---|---|---|
| Secure employment of value chain workers | R | ✓ | ✓ | ✓ |
| Working conditions | R | ✓ | ✓ | ✓ |
| Health and safety | R | ✓ | ✓ | ✓ |

### 6.9.1 Policies related to value chain workers [S2-1]

The policies related to value chain workers described below reflect our commitment to respecting human rights and adhering to the key international standards and agreements in this area.

Key ORLEN Group policies for managing material impacts on workers in the value chain

Supplier Code of Conduct

The Code sets out the standards and expectations we apply to ORLEN Group's suppliers. Before entering into cooperation, suppliers are required to accept the Code and any other relevant contractual provisions, and to comply with them throughout the business relationship. The Code defines the minimum standards of conduct expected from suppliers in their entire supply chain, and reflects our commitment to respecting human rights and the key international standards and agreements in this area. It addresses a number of essential issues, including impacts and risks related to health and safety of value chain workers, adequate pay, working time as well as the prohibition of forced labour, child labour and human trafficking. Its provisions apply across all ORLEN Group locations in Poland and abroad. Its scope also covers indirect impacts across the value chain, including those arising from field works, transport and upgrades carried out by contractors. Responsibility for implementing and applying the Code lies with the ORLEN S.A. Management Board, with day-to-day oversight provided by the directors responsible for the relevant areas. The document is publicly available on the ORLEN website.

Code of Conduct for Business Partners

A document establishing ethical and social standards expected of our business partners in such areas as occupational health and safety, diversity, gender equality, social dialogue, fair wages, and the prohibition of child and forced labour. It is widely applied across the ORLEN Group as a tool to promote responsible business practices and sustainable development throughout the value chain.

ORLEN Group Human Rights Policy

The Policy establishes the framework for ensuring respect for human rights across our organisation and in relations with our stakeholders, including value chain workers. Its overarching objective is to protect human rights across our value chain. It addresses such impacts and risks as violations of the rights of workers in the value chain and issues related to social dialogue. The document applies across all Group companies, our entire value chain (including contractors involved in fieldwork, transport and operational activities), and all geographical locations in which we operate. Responsibility for its implementation lies with the Management Board, the Directors of the relevant areas, and the Ethics Officer. The Policy is available on the Group's website. It takes into account community needs expressed through complaints, reports and local dialogue.

The effectiveness of the Code and the Policy is monitored through:

- the analysis of reports and complaints,
- oversight by the responsible Directors and, in the case of the Human Rights Policy, the Ethics Officer.

Other documents governing the value chain workers area:

- ORLEN Group Procurement Policy: policy supporting our strategy through the management of the procurement categories, building a modern management culture combined with operational excellence, and fostering a sustainable supply chain. One of its strategic objectives is to provide a framework for the qualification and assessment of suppliers;
- Integrated Management System: the IMS supports risk management and compliance processes, shaping the way we monitor and manage risks related to workers in our value chain;
- ORLEN Group Anti-Corruption and Misconduct Prevention Policy: a policy defining a fair and transparent business model for the Group, supporting trust, security, fair competition, and value creation for all stakeholders;
- ORLEN Group Rules for Accepting and Offering Gifts;
- ORLEN S.A. Internal Whistleblowing Rules;
- Organisational Standard for the ORLEN Group Policy for the Management of Occupational Health and Safety, Fire Safety, Process Safety, and Safety of Storage and Transport of Dangerous Goods.

Furthermore, our practices are rooted in internal regulations, national legislation, and internationally recognised frameworks, including:

- International Bill of Human Rights,
- ILO Declaration on Fundamental Principles and Rights at Work,
- UN Guiding Principles on Business and Human Rights – the 'Protect, Respect, Remedy' framework,
- OECD Guidelines for Multinational Enterprises,
- International Finance Corporation (IFC) Performance Standards,
- Ten Principles of the United Nations Global Compact.

The most senior level in our organisation responsible for the implementation of policies related to value chain workers is the Management Board of ORLEN S.A. and the respective Management Boards of other ORLEN Group companies.

In 2025, no complaints relating to activities of the ORLEN Group companies were submitted to the OECD National Contact Point. No cases of severe human rights incidents, including forced labour, human trafficking, or child labour were identified at the ORLEN Group.

Changes in policies related to value chain workers

In 2025, the ORLEN Group Procurement Policy was updated. Five sustainability streams were defined: climate, environment, employees, communities and governance, to minimise negative impacts and drive positive change among entities in our supply chains.

In 2025, we also revised the Organisational Standard for the ORLEN Group Policy for the Management of Occupational Health and Safety, Fire Safety, Process Safety, and Safety of Storage and Transport of Dangerous Goods.

To the best of our knowledge, no cases of non-compliance with the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises that involved value chain workers were identified.

### 6.9.2 Processes for engaging with value chain workers about impacts [S2-2]

We do not have a policy specifically addressing the ORLEN Group's engagement with workers in the value chain; however, we have defined rules for cooperating with suppliers. At present, this is the most relevant aspect of our engagement with workers in our value chain. Given the broad geographic spread of our sourcing activities and the wide range of goods and services we purchase, cooperation with suppliers is managed through a diversified framework involving different organisational units and different systems. Each company verifies its suppliers independently, in line with separate guidelines, and engages with value chain workers. Companies that have implemented our Organisational Standard for procurement manage these processes in accordance with central guidelines for supplier assessment and verification. In 2025, we launched a project to establish a centralised counterparty risk management function. The Counterparty Risk Management Office is currently being set up. It will be responsible for obtaining counterparty information required by the ORLEN Group, and keeping that information up to date in dedicated corporate systems. Plans also include the development of a dedicated IT system to manage a central counterparty database and to automate the verification process to the greatest extent possible. The Head of the Counterparty Risk Management Office will have operational responsibility for verifying cooperation and monitoring results.

Currently, we apply the following formal requirements in our cooperation with suppliers and business partners:

- acceptance of the Supplier Code of Conduct,
- acknowledgement of receipt and review of the Human Rights Policy,
- acknowledgment of receipt and review of the anti-corruption rules,
- inclusion of anti-corruption and sanction clauses in contracts,
- work rules for contractors / work safety requirements.

### 6.9.3 Processes to remediate negative impacts and channels for value chain workers to raise concerns [S2-3]

Our Human Rights Policy outlines the procedures for anonymous and voluntary reporting of violations and cases of misconduct. We guarantee the confidentiality and safety for individuals reporting concerns and are committed to ensuring effective remediation and appropriate corrective measures.

#### Channels to raise concerns

- Occupational safety hazard reporting systems operating in selected companies
- Ethics Officer
- Local Community Relations Officer
- A whistleblowing channel through which anyone acting in good faith may anonymously report violations of law by email at naruszenieprawa@orlen.pl or by telephone; Reports are handled by the Control and Security Office.

These channels are generally accessible, and information about them, together with guidance on how to submit reports, is published on the ORLEN website.

Since 2024, we have had in place a Whistleblower Protection Policy, covering reports of irregularities made in a work-related context, as well as the ORLEN S.A. Internal Whistleblowing Rules, which apply to the Group's own workforce and to workers in our value chain and ensure a safe and secure environment for reporting concerns. For details, see disclosure G1.

Investigations in cases involving workers in the value chain are carried out using the same mechanisms as those applied in cases concerning the Group's own employees; for details, see disclosure S1-3. The receipt and handling of reports concerning violations of law and internal regulations are governed by the ORLEN S.A. Internal Whistleblowing Rules, which ensure that cases are handled confidentially and with due respect for privacy and data protection rights. We are also developing a process for contractor verification and sustainability risk assessment covering environmental, social and governance matters. The aim of this process is to identify potential and actual indications of irregularities in the area of sustainability. Identifying such indications will help us define the appropriate course of further engagement with the contractor as part of the due diligence process, with a view to minimising risks and reinforcing good practices.

All supplier commitments relating to the rights of workers in the value chain are accepted by suppliers at the outset of the business relationship.

We are currently carrying out a project to introduce measures to manage material risks and pursue material opportunities related to workers in the value chain. The project is expected to be completed within five years. It is also intended to provide for remedy measures to be applied in the event of negative impacts on workers in the value chain, put in place channels for raising concerns, and establish ways of tracking and monitoring reported issues.

### 6.9.4 Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions [S2-4]

We seek to advance our positive impacts and currently we are taking steps to determine the optimal form of engagement with suppliers to improve working conditions for value chain workers. We have implemented a range of mechanisms to foster positive impacts on workers in our value chain, including:

- Appointment of the Ethics Officer;
- Register of Qualified Contractors: A tool used by the Energa Group to assess and select contractors meeting established standards;
- Anti-corruption clauses: Clauses included in business contracts to safeguard against corruption and conflicts of interest;
- Occupational health and safety: Requirement for contractors to comply with all relevant OHS regulations and procedures; Safety Points for ORLEN Service Stations, representing the fundamental rules required to be observed on the premises our of CODO service stations; contractual clauses Ensuring compliance with working time regulations, OHS standards, and the necessary training and certification requirements for workers.
- Training for personnel working at service stations and fuel terminals, training for road tanker drivers, and training provided through the ORLEN S.A. Training Centre, including detailed verification of both theoretical and practical knowledge in areas such as occupational health and safety, mechanics, electrical systems, and local hazards present at ORLEN production sites.
- Opportunity to participate in the ORLEN Group's annual Occupational Safety and Health Protection Days.
- Mechanisms for reporting occupational safety hazards by employees of third-party companies.

We monitor the outcomes of these activities. For the results, see the table on the effectiveness of the occupational health and safety management system at the ORLEN Group in disclosure S1-14.

As part of our business model, we adhere to responsible sourcing practices, with our suppliers required to comply with the Supplier Code of Conduct and the ORLEN Group Code of Ethics. Suppliers are evaluated for compliance with these Codes and policies, including in the area of sustainability. In the coming years, we plan to carry out enhanced audits as part of the due diligence process, and to continually refine and adapt our operational and procurement procedures by identifying risks associated with workers in our value chain. This will lead to the implementation of more robust supplier selection and qualification procedures. The integration of ESG considerations into procurement processes will influence our operational strategy and support the achievement of the United Nations Sustainable Development Goals (SDGs).

The material impacts and risks relating to workers in the value chain identified through the double materiality assessment will be subject to further analysis, and we will make every effort to develop and implement an appropriate management approach. We are currently carrying out a long-term project to introduce measures to manage material risks and pursue material opportunities related to workers in the value chain. The project is expected to be completed within five years.

As part of our structured system for managing the safety of contractors performing work on premises owned or leased by ORLEN Group companies:

- we monitor accident rates for employees of third-party companies working on sites owned or leased by the ORLEN Group, and these statistics are included in the ORLEN Group's occupational safety KPIs;
- we conduct inspections and audits to verify work safety and contractors' preparation for the work to be performed, including inspections and audits required under our Technical Standard: Classification and Supervision of Safety of Third-Party Companies Operating on the ORLEN Group's Sites or Providing Services to ORLEN Group Companies.
- we organise work safety workshops and webinars for employees of third-party companies;
- we hold inspections in the form of management Safety Walks on ORLEN Group sites, which also cover activities of third-party contractors; In addition, periodic inspections are performed by OHS services to verify work safety and third-party employees' preparation for the work to be performed.

We monitor the outcomes of these activities. For the results, see the table on the effectiveness of the occupational health and safety management system at the ORLEN Group in disclosure S1-14.

We are currently implementing a supply chain due diligence system, in line with the requirements of the Corporate Sustainability Due Diligence Directive (CSDDD).

Furthermore, work is underway to introduce new procedures for centralised supplier verification, which will also address ways to minimise negative impacts on individuals associated with our value chain.

During the reporting period, we identified no material operating expenditures or capital expenditures related to value chain workers.

### Internal functions involved in managing value chain worker-related matters

Effectively managing positive and negative impacts on workers in our value chain requires the active involvement of multiple organisational units across the ORLEN Group. Each unit plays a vital role in identifying, assessing, and managing risks, while also helping to drive initiatives that support sustainability goals. The Procurement area, responsible for implementing the ORLEN Group strategy for a sustainable value chain, oversees supplier relationships. It plays a critical role in contract negotiations and monitoring supplier standards. We plan to develop relevant standards, processes, and initiatives to be rolled out across ORLEN Group companies under the segment-based management model.

### 6.9.5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [S2-5]

We have not set any measurable targets related to value chain workers. We plan to define measurable, outcome-oriented targets related to workers in the value chain within five years.

One of our goals under the Sustainable Development Strategy for 2025–2035 is to maintain the Total Recordable Incident Rate for the ORLEN Group (number of workplace accidents involving our employees and contractors) at below 0.2 from 2030 onwards. To achieve this goal, we inspect contractors' workplaces, verify their qualifications, and provide training on safe working practices. As part of work on strategy operationalisation, ORLEN Group companies further enhance the area of contractor personal safety management.

## 6.10 Affected communities [ESRS S3]

### Interests and views of stakeholders [S3.SBM-2]

Our business model and strategy determine the scale and duration of our impacts on local communities. The nature of refining, petrochemical and energy operations entails unavoidable negative impacts, including odour nuisance, noise, light emissions and impacts on land. At the same time, our energy infrastructure and production facilities present complex public safety challenges. We reflect these considerations in our strategy by adapting processes and projects to minimise negative impacts and enhance social benefits through various measures including the implementation of process safety standards, emergency response planning, the design of process units to reduce environmental nuisance, and stakeholder engagement based on transparent communication. In addition, the organisational structure includes a Local Community Relations Officer responsible for ongoing engagement with local residents, addressing identified needs and coordinating public consultations.

Our strategy envisages strengthening positive impacts, in particular through support for local safety, education and the energy transition. We work with local authorities and institutions, and our corporate foundations play a key role in delivering grant, educational and charitable programmes, as described below. We also actively engage in crisis response, supporting communities affected by natural disasters through financial, logistical and in-kind assistance.

Respect for human rights and the rights of local communities is integral to our operations and is reflected in internal policies governing ethical conduct, community relations and sustainable development. Strategic objectives related to local communities are defined under the Communities pillar of the ORLEN Group Sustainable Development Strategy for 2025–2035 and include actions designed to support a just transition and improve safety and quality of life in the vicinity of our assets.

### Material impacts, risks and opportunities and their interaction with strategy and business model [S3.SBM-3]

We systematically manage our relationships with local communities. The operational nature of many assets, combined with their location near residential areas or agricultural land, results in impacts that are both direct and long-term.

We undertake measures to reduce nuisance associated with infrastructure operations, including aligning projects with environmental and social requirements, implementing solutions to reduce noise and odour emissions, planning works to minimise disruption, and strengthening engagement and grievance mechanisms.

Negative impacts identified in the vicinity of our assets, such as operational nuisance, impacts on land and incidental disturbances, are assessed in terms of their potential effects on operating costs, reputation and long-term project viability. This enables us to adapt our business model to limit factors that could lead to social conflict or project delays.

Impacts on local communities may give rise to material risks that influence our strategy:

- **Operational and financial risks** – recurring nuisance, such as noise, odours or increased traffic, may increase investment needs related to plant upgrades, as well as costs associated with compensation and indemnification programmes. Impacts on land and relationships with landowners may also create legal and financial risks in project implementation.
- **Social and reputational risks** – community opposition to the siting or expansion of infrastructure may cause delays, extend administrative procedures and affect the feasibility of strategic projects.

These risks are reflected in the ongoing refinement of the business model, including through the assessment of the social context prior to entering new geographic areas, the planning of public consultations at early project stages, and the implementation of less intrusive technologies and environmental standards.

At the same time, our impacts create strategic opportunities:

- **Strengthening trust and legitimization** – through investments in local safety, support for emergency services, and educational and social programmes that facilitate project implementation.
- **Enhancing business resilience** – by strengthening relationships with local communities, including constructive engagement with local authorities and residents, we build trust in the ORLEN Group' brand, reduce the risk of disputes, and can respond more effectively to incidents and grievances.

## Characteristics of affected communities and description of impacts

Disclosures cover local communities residing or operating in the vicinity of our assets: production plants, storage and transmission infrastructure, and our project and hydrocarbon production sites. Local communities also include institutions and organisations representing residents, as well as communities indirectly affected by contractor activities, for example through increased heavy vehicle traffic or temporary restrictions on property access.

Communities located in close proximity to our infrastructure are the most exposed to impacts. Impacts are typically systemic and include periodic noise and odour nuisance, vibrations, increased traffic, and the effects of repair or modernisation works. In certain cases, incidental impacts may also occur, such as individual complaints from residents.

Our operations also generate material positive impacts for selected groups of affected communities, in particular those located near our production assets and project sites and those undergoing transition. Positive impacts arise from initiatives that strengthen local safety, social resilience, access to education, and the development of local skills and capabilities. They are particularly relevant in areas where long-term infrastructure or investment projects are implemented, including those related to the energy transition, as well as in communities supported through programmes delivered by the Group's corporate foundations.
Positive impacts are selective and relate to specific groups of affected communities, including residents near key projects and local community organisations. We take measures addressing specific social needs, such as support for public safety organisations (including the Mountain Volunteer Search and Rescue Service, and the Tatra Mountain Volunteer Search and Rescue Service). Positive impacts create material opportunities for the Group by strengthening social acceptance of its operations, reducing social and reputational risks, and supporting the long-term viability of its projects. Actions generating positive impacts are described in more detail in section S3-4 - Actions taken in relation to affected communities.

For reporting purposes, the terms 'local communities' and 'affected communities' are used interchangeably, reflecting both groups exposed to ongoing impacts from operations and communities subject to temporary impacts arising from project activities.

As part of our analysis of the impact of our operations on affected communities, we did not identify any impacts on indigenous peoples.

## Table 119 Double materiality assessment summary for affected communities [S3.IRO-1]

| Segment | Area | Geographical region | S3<br>Risk, opportunity, impact | Impact (I)<br>Risk (R)<br>Opportunity (O) | Positive (+)<br>Negative (-) | Actual (A)<br>Potential (P) | Value chain<br>Organisation (O)<br>Downstream (D)<br>Upstream (U) |
|---|---|---|---|---|---|---|---|
| Upstream & Supply, Downstream, Energy, Consumers & Products | Refining, Upstream, Energy, Petrochemicals, Gas, Retail | Europe, North America, Libya Pakistan, Middle East | **Adequate housing for local communities** | | | | |
| | | | Impact on the housing conditions of local communities due to noise, odour and light nuisance | I | - | A | O, D, U |
| | | | Increased costs of actions for the benefit of local communities and the management of operational nuisances | R | | | O, D, U |
| | | | **Land-related impacts, impacts on indigenous peoples** | | | | |
| | | | Land-related impacts of the Group's operations | I | - | A, P | O, D, U |
| | | | Costs of compensation and redress payments | R | | | O, D, U |
| Upstream & Supply, Consumers & Products | Upstream and Gas, Retail | Europe | **Security-related impacts** | | | | |
| | | | Supporting the safety of local communities through sharing resources and providing training | I | + | A, P | O, D |
| | | | Strengthening the Company's reputation by participating in local community training and supporting fire service units in Poland | O | | | O, D |
| Upstream & Supply, Downstream, Energy, Consumers & Products | Refining, Upstream, Energy, Petrochemicals, Gas, Retail | | Complex safety conditions for local communities due to the nature of operations | I | - | P | O, D, U |
| | | | Improving energy security and ensuring just transition | I | + | A, P | O, D |
| | | Poland | **Freedom of expression** | | | | |
| | | | Active engagement with local communities; Local Community Ombudsman within the organisation | I | + | A | O |
| Upstream & Supply, Downstream, Consumers & Products | Refining, Petrochemicals, Gas, Retail | | **Community support, including support for local communities*** | | | | |
| | | | Numerous community-outreach initiatives and own programmes (charity, sponsorship), including activities of corporate foundations | I | + | A | O |
| | | | Better relationships with local communities, building brand trust | O | | | O |

* Additional topic.

| | | short-term | medium-term | long-term |
|---|---|---|---|---|
| Adequate housing for local communities | R | ✓ | ✓ | ✓ |
| Land-related impacts, impacts on indigenous peoples | R | ✓ | ✓ | ✓ |
| Community support, including support for local communities* | O | ✓ | ✓ | ✓ |

### 6.10.1 Policies related to affected communities [S3-1]

ORLEN S.A. Community Relations Management Policy

The Policy governs the management of impacts, risks and opportunities arising from operation of our assets and their effect on local communities. It sets out the following objectives:

- to minimise operational nuisance,
- to build long-term relationships based on dialogue,
- to ensure alignment between business, social.

The Policy addresses impacts and risks such as noise, odours, restrictions on property access, the risk of claims and social tensions, as well as opportunities related to improved relationships, increased trust and the facilitation of project implementation.

The Policy applies to all ORLEN Group locations in Poland and abroad where its production, logistics, project and upstream operations are carried out. Its scope also covers indirect impacts across the value chain, including those arising from field works, transport and upgrades carried out by contractors.

Responsibility for the implementation and application of the Policy rests with the ORLEN S.A. Management Board, while operational oversight is exercised by the relevant directors and the Local Community Relations Officer.

The Policy has been developed taking into account the expectations of local communities, identified through consultations, reporting channels and ongoing dialogue led by the Local Community Relations Officer.

The document is publicly available on orlen.pl, and information on its implementation is communicated to communities through meetings, consultations and reporting channels.

Human Rights Policy and Code of Ethics

The ORLEN Group Code of Ethics and the Human Rights Policy set out our commitment to preventing negative impacts on human rights, including those affecting local communities. They address impacts such as access to information, the ability to raise concerns, safety in the vicinity of assets, respect for property rights, and risks related to potential infringements of the rights of local communities and landowners.

The document applies across all Group companies, our entire value chain (including contractors involved in fieldwork, transport and operational activities), and all geographical locations in which we operate.

The policies are aligned with:

- The International Bill of Human Rights,
- The United Nations Declaration on the Rights of Indigenous Peoples,
- ILO Convention No. 169,
- The OECD Guidelines for Multinational Enterprises,
- The United Nations Guiding Principles on Business and Human Rights.

Overall responsibility for its implementation rests with the ORLEN S.A. Management Board, while operational oversight is exercised by the relevant directors.

In updating and applying the policies, material needs of local communities, as expressed through grievances, reports and ongoing local dialogue, are taken into account.

The documents are publicly available, and information on grievance channels is communicated to affected communities via the website and dedicated contact channels.

Charitable Policy and implementation standards

The Policy governs donations and community support, addressing impacts and opportunities related to social engagement, including:

- social contribution and sponsorship activities,
- projects delivered by corporate foundations,
- building trust and strengthening relationships with communities affected by the Group's operations.

Considering the impacts of our operations, the Policy defines the following areas of community engagement:

- Sustainable development:
  - projects focused on environmental protection,
  - projects addressing the needs and rights of communities affected by exclusion or deficits in key areas of life, aimed at mitigating negative impacts or generating positive impacts,
  - projects related to the protection and respect of human rights,
  - projects addressing just transition.
- Education and science: initiatives supporting the advancement of education and science, including scholarship programmes, vocational training, basic and applied research, science outreach, and support for educational and research institutions.

- Culture and the arts: initiatives promoting culture and the arts, including funding for exhibitions, concerts, festivals and cultural institutions; improving access to culture.
- Health and social care: support for healthcare institutions, preventive health programmes, and initiatives aimed at improving the quality of life of people in need,
- Sport, recreation and tourism: promoting physical activity and healthy lifestyles, supporting the development of amateur and professional sport and recreational activities, as well as advancing and promoting tourism,
- Public safety and civil protection: initiatives supporting public safety services and the maintenance of public order, rescue and civil protection services, including support for volunteer fire brigades and entities authorised to carry out mountain, water and maritime search and rescue.

The Policy is directly linked to identified impacts, risks and opportunities, including strengthening social acceptance of projects and reducing the risk of conflicts. It applies across the ORLEN Group and, through the Organisational Standard, extends to subsidiaries implementing charitable activities, and it covers all locations where social projects are carried out. Responsibility for implementation rests with the Management Board of ORLEN S.A., while operational delivery is ensured by the Group's corporate foundations and relevant organisational units. The Policy has been developed to address local needs, and its priorities reflect the areas most frequently identified as material, including safety, education, health and local development. Information on the Policy and support programmes is published on orlen.pl and on the websites of the Group's foundations.

Environmental policies in the context of local communities

The ORLEN Group Climate Policy, Environmental Protection Policy, Biodiversity Policy, Energy Policy and the ORLEN Transition Plan address impacts and risks related to environmental nuisance, emissions, land use, climate risks, and the effects of infrastructure on local living conditions. Together, these documents shape the Group's relationships with local communities by reducing environmental nuisance, preventing incidents and supporting the deployment of more efficient technologies.

They apply to all of the Group's production, energy, logistics and infrastructure assets, as well as to impacts across the value chain, including indirect emissions, water management and land use during project implementation. Oversight is exercised by directors responsible for environmental, climate and energy areas. The Policies are aligned with relevant UN climate frameworks, EU environmental standards and sustainability reporting requirements. The policy documents and information on their implementation are available on orlen.pl and in ESG and sustainability publications.

Monitoring and evaluation of policy implementation

The monitoring process includes:

- ongoing analysis of submissions and grievances from affected communities,
- assessment of response timeliness,
- monitoring of corrective actions,
- oversight by the Local Community Relations Officer,
- evaluation of compliance with international guidelines,
- at subsidiary level, monitoring compliance with local safety procedures and incident response.

During the reporting period, we did not identify any instances of non-compliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises, in relation to affected communities.

We did not record any significant incidents or human rights violations affecting local communities during the reporting period.

### 6.10.2 Processes for engaging with affected communities about impacts [S3-2]

We manage our relationships with local communities in areas where we operate or plan to operate, including local residents, their representative organisations and associations, as well as local authorities and institutions. This engagement is carried out through various forms of cooperation, such as social initiatives, programmes run by our corporate foundations, community information meetings, and partnerships with local governments and institutions. We maintain ongoing dialogue with local communities and their representatives both when entering a new location and throughout our operational presence. Engaging early and consistently enables us to respond to local needs and stakeholder expectations, and helps build understanding of our objectives among the local communities. Before commencing operations in a given area, we engage with local authorities, NGOs, and residents in the immediate vicinity of the planned project.

Responsibility for fostering and maintaining strong relations with local communities lies with the Local Community Relations Officer, the highest operational role in this area, responsible for ensuring alignment between business and social objectives.

**The responsibilities of the Local Community Relations Officer include:**

- advising other ORLEN Group functions on improvement actions or measures designed to prevent negative impacts,
- collaborating with ORLEN Group business areas on community engagement and relationship-building,
- ensuring that representatives of local communities have safe and open channels to raise concerns, share feedback, ask questions, or submit complaints regarding our activities,
- receiving, analysing, coordinating, and responding to issues submitted via official communication channels, including a dedicated email address rzecznik.spolecznosci@orlen.pl and an online form available on the Group's website orlen.pl/zrownowazony-rozwoj/strategia-zrownowazonego-rozwoju/rzecznik-ds.-spolecznosci-lokalnych.

As part of our broader commitment to supporting communities, including local ones, we actively engage with stakeholders using a variety of communication channels. We regularly receive inquiries and correspondence related to support for social initiatives, coming from local authorities, civil society organisations, and residents. Organisations, including local entities, may also apply for sponsorship in the areas defined in the Charitable Policy.

To evaluate the effectiveness of our community engagement efforts, we monitor and gather feedback and analyse received submissions, assess the outcomes of our activities, and ensure transparency and access to information. The surveys conducted in Płock and its surrounding areas, the Tri-City, Ostrołęka, Włocławek, Przemyśl and Sanok provide insight into local needs and expectations and support the planning of charitable activities in key locations. In 2025, matters relating to engagement with indigenous peoples, including free, prior and informed consent (FPIC), were assessed as not material for the ORLEN Group.

### 6.10.3 Processes to remediate negative impacts and channels for affected communities to raise concerns [S3-3]

We take active steps to mitigate any negative impacts of our operations on local communities and seek to avoid or minimise situations that may give rise to nuisance. Where it is not possible to fully eliminate negative impacts, remedial and compensatory measures are implemented.

Our negative impacts on local communities are mitigated through a range of measures, including:

- adapting technical solutions to reduce nuisance (for example, installing noise barriers near infrastructure),
- payment of damages and compensation in cases related to the negative impacts of infrastructure,
- maintaining ongoing dialogue with local communities, either directly or through their legitimate representatives.przedstawicieli i wiarygodnych reprezentantów.

Positive impacts are advanced through such measures as:

- investments supporting the development of local communities.

Preventive measures include:

- running educational and informational campaigns to raise awareness about our ongoing projects,
- communicating planned actions or potential disruptions to local communities in advance,
- analysing the location of our planned projects.

The effectiveness of monitoring channels is assessed by analysing the number of submissions and grievances received via dedicated mailboxes, as well as through traditional correspondence and telephone channels. The Local Community Relations Officer's mailbox serves as a formal, permanent and accessible communication channel, enabling residents to submit comments, opinions, concerns and grievances regarding our activities. The process aims to ensure transparent, efficient and two-way communication, enabling the timely provision of verified information and supporting open dialogue with local communities. In the context of the widely reported New Chemistry project, a dedicated contact form is available on orlen.pl/pl/o-firmie/kluczowe-projekty/nowa-chemia/kontakt to facilitate communication and ensure an efficient flow of information with affected communities.

To keep the public informed, particularly on the operations of our Płock production plant, we operate a free communication platform called ORLEN Info, which provides updates on events that may raise concerns among residents of Płock and the surrounding area. Communications explain the causes and expected duration of any disruptions, such as visible flaring, thereby enhancing residents' sense of safety, including in the event of potential incidents. Residents may also receive updates across selected thematic categories, including culture, science and education, the New Chemistry project, the ORLEN Foundation, sport and volunteering. Anonymous reporting channels are also available, including a dedicated anonymous reporting system, as well as telephone and traditional mail. Internal regulations, including the Whistleblower Protection Policy and the ORLEN Group Code of Ethics, protect whistleblowers from potential retaliation. Further information on reporting and handling concerns, including violations of values and standards of conduct, is provided in disclosure G1-1.

Table 120 Communication channels for affected communities supporting the remediation of negative impacts

| Processes to remediate negative impacts | Channels to raise concerns and report issues | Description of mechanism |
|---|---|---|
| Local Community Relations Officer | Traditional mail, email, and a dedicated contact form | The Local Community Relations Officer is responsible for maintaining high standards in relationships with communities located near ORLEN Group assets. The role includes operating communication channels that allow communities to submit comments, opinions and grievances. All submissions are recorded and handled in line with applicable internal procedures. |
| ORLEN Ethics Officer | Traditional mail and email | The Ethics Officer is responsible for compliance with the ORLEN Group Code of Ethics within our organisation. Their key responsibility is to ensure that all our stakeholders have a safe and anonymous way to report any breaches of ethical standards in place across the ORLEN Group. |
| Violation reporting system under the ORLEN Group Whistleblower Protection Policy | Traditional mail, drop boxes in Warsaw and Płock, email (naruszenia@orlen.pl) and telephone | The system enables anonymous and voluntary reporting of any actions or omissions that are unlawful or intended to circumvent the law. We guarantee confidentiality and security for individuals who report or disclose violations, while also committing ourselves to an effective and thorough remedial process and the implementation of corrective measures. All submissions received via the system, regardless of whether they are specifically referred to in the Policy, are accepted and forwarded to the relevant entity or function. |
| Public consultations | In-person, during consultation meetings | The consultations are held in relation to specific projects, which are preceded by an assessment of potential risks to local communities conducted before the project launch. |
| Supplementary mechanisms in selected ORLEN Group companies | Traditional mail, dedicated email addresses, telephone, contact forms or direct contact with company representatives at local customer service offices | These mechanisms are implemented in the context of specific projects and as part of day-to-day operations. They include, for example, 24/7 incident reporting channels, weekday service channels, customer service offices, and submissions made through legitimate representatives or trusted intermediaries. |

## Local Community Relations Officer

In 2025, the Local Community Relations Officer received 209 submissions across the ORLEN Group, including foreign subsidiaries. They related to environmental protection, infrastructure failures and social matters. Upon receiving each submission, the Local Community Relations Officer requests clarification from the person responsible for the relevant business area in order to investigate the issue and provide reliable feedback to the reporting party. The Officer supports the clarification process and, where appropriate, also oversees the implementation of remedial actions by the ORLEN Group. Once a course of action has been agreed with the relevant function, a response is provided to the reporting party either by the Officer or the designated business area. Reliable responses to submissions from affected communities allow us to better tailor our activities to the actual requirements and challenges faced by local communities. The number and content of submissions are also used to assess whether affected communities are aware of available reporting channels and applicable processes.

The role of the Local Community Relations Officer includes building relationships with communities and ensuring that residents can freely raise comments, opinions and grievances. Following organisational changes within ORLEN S.A., a new Local Community Relations Department was established. As a result, the Officer is supported by two local organisational units in key operational locations in Płock and Gdańsk. The organisational changes have strengthened our ability to engage with local communities and respond to their needs. A local presence and ongoing contact with residents enable more effective identification of expectations, timely responses to challenges and the development of long-term relationships. Measures taken to improve communication with stakeholders included updates to content on orlen.pl and the standardisation of requirements for submissions to the Officer's mailbox. In 2025, the Officer met with representatives of local authorities and municipal organisations in areas where the Group operates to build long-term relationships.

In the same year, a total of 70 grievances were recorded in the environmental area and across ORLEN Group companies. These mainly concerned noise, odour and light pollution, as well as land use. Reports were submitted via company email addresses, intervention hotlines, helplines, contact forms and the Environmental Inspection System. All grievances were reviewed, and the affected whistleblowers received appropriate explanations, remediation or financial compensation, as applicable.

### 6.10.4 Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions [S3-4]

We have not yet developed a formal mapping of actions relating to affected communities to identified impacts, risks and opportunities, nor linked them to specific objectives, as most initiatives were already in place before the ESRS standards came into force. Nevertheless, all actions remain aligned with the adopted policies, and we are currently working to develop a comprehensive mapping in line with the MDR-A requirements, which we plan to disclose in the next sustainability statement.

To support actions targeting affected communities, we allocate financial resources (as described in the table at the end of this subsection), as well as human resources, including the dedicated function of the Local Community Relations Officer, expert teams and employees engaged in volunteer activities. We also deploy technological, infrastructure and informational resources.

This section presents only selected actions undertaken by ORLEN Group companies. As work continues to align these initiatives with targets, metrics and material impacts, risks and opportunities, the next sustainability statement will also set out the approach used to select these initiatives, including the criteria applied to identify sustainability-related activities within the Group.

**Selected actions for local communities undertaken by ORLEN Group companies:**

**Projects addressing just transition**

In 2025, we launched the Just Transition programme area, a key instrument for delivering our Sustainable Development Strategy under the Communities and Environment pillars. It addresses

challenges related to economic transformation, including the energy transition and its implications for local communities, and includes actions to preserve and protect biodiversity, particularly in areas adjacent to ORLEN infrastructure.

In collaboration with *Polityka Insight*, in 2025 we published the report "Cities Transition Index", assessing the readiness and progress of the 37 largest cities in Poland across heat, electricity, circular economy, environment and transport. The analysis was complemented by examples of well-designed policies implemented by smaller cities. We also partnered in the Local Government Climate Congress in Łódź.

As part of our engagement with local communities, the ORLEN Group Sustainable Development Strategy identifies the ORLEN as a Good Neighbour initiative, whose objectives were implemented in 2025 through activities supporting just transition, including the ORLEN Community Energy programme. Its first edition targeted communities near fuel terminals and is designed as a long-term initiative to build partnership-based relationships with local communities.

The ORLEN Think Energy grant programme was also launched to fund research and analytical projects in energy transition, decarbonisation, sustainable development and socio-economic resilience. We supported initiatives strengthening the resilience of cities and communities to energy, climate and information-related challenges, including by co-funding the Energy Transition Cities Forum and the Resilient and Strong Poland project.

The ORLEN Foundation for Pomerania plays a particularly important role in this area, given the scale and nature of its initiatives. In 2025, the Foundation's support for the Just Transition programme focused primarily on implementing initiatives in selected locations of ongoing renewable energy projects, particularly offshore wind projects operated by the ORLEN Group. In the municipality of Łeba, where the Baltic Power project is being developed, outreach activities included supporting local communities and building relationships with local authorities. In 2025, the second edition of the Baltic Power grant programme was delivered, providing financial and expert support to initiatives submitted by residents and community organisations in Łeba, including funding for the full or partial implementation of selected projects. The primary objective of the programme is to stimulate social engagement among local organisations and informal groups. It also aims to foster integration among residents of Łeba, which is located near the Baltic Power offshore wind project.

Projects related to environmental protection and biodiversity are described in disclosures E1 and E4.

## Actions to support freedom of expression and local communities

The ORLEN Group engages in dialogue with affected communities, including through the Local Community Relations Officer. A detailed description of the Officer's role, the actions undertaken, the communication channels used and the mechanisms for monitoring their effectiveness is provided in disclosures S3-2 and S3-3. As part of our double materiality assessment, we identified an additional area (organisation-specific disclosure): community support, including support for local communities, through which we exert material actual positive impacts on affected communities. The inclusion of this topic reflects the central role that community engagement plays in the ORLEN Group's operations. Supporting communities is a core component of our Sustainable Development Strategy and embodies our fundamental values. We foster social engagement and reinforce our position as a responsible community partner through our own initiatives, including charitable and sponsorship programmes, and the projects run by our corporate foundations, which play a vital role in building social capital and in strengthening and integrating local communities. Projects delivered through the foundations, such as health, education, sports, and culture, help address pressing social challenges and respond to the needs of the wider environment. Volunteer efforts by our employees, carried out with the support of the corporate foundations, are also an important aspect of this work.

## Selected projects in education and science

We actively support the development of local talent through a variety of educational programmes targeting students at different stages of learning, as well as through partnerships with universities. Listed below are some of the initiatives implemented in this area 2025.

- As part of our nationwide educational initiatives, we supported a communication campaign on offshore wind energy delivered by the Polish Wind Energy Association. The campaign aims to build public understanding of offshore wind development in Poland, counter misinformation, and highlight the opportunities it creates, including career prospects.

Corporate foundations play a particularly important role in this area, given the scale and nature of their initiatives.

Selected initiatives implemented by the Ignacy Łukasiewicz ORLEN Foundation:

- Science on the Move – Science Bus programme delivered on a continuous basis – features a double-decker bus equipped with chemistry and physics laboratories and a demonstration tent, enabling interactive lessons and shows. It aims to spark interest in science among primary and secondary school students and to deepen their knowledge through engaging, non-conventional approaches. In 2025, the Science Bus visited 49 schools.
- Nationwide FunLab grant programme – supports schools, particularly in smaller towns, in establishing modern, fully equipped science laboratories for chemistry, physics, biology and vocational subjects.
- Museum Destination grant programme – launched in a pilot edition in 2025 for primary and secondary schools. Selected beneficiaries received grants of up to PLN 10 thousand to organise school trips to the Warsaw Gasworks Museum, the Gas Industry Museum in Paczków and the Oil Industry Museum in Bóbrka.

Selected initiatives implemented by the ORLEN Foundation:

The ORLEN Foundation delivers a wide range of grant and scholarship programmes, including Bona Fide, My Above-Average Interests, From Molecules to Galaxies, I Can Do More, Holidays with the ORLEN Foundation, Power of Responsibility, Model United Nations, and climate education initiatives, as well as the Safe Teenager in the Digital World project; for details, see the foundation's website at www.fundacja.orlen.pl. In addition to supporting talented pupils and students, the programmes help develop the skills of future engineers and researchers who may join the ORLEN Group, while also promoting equal access to education.

## Projects supporting public safety and civil protection

A key role in mitigating negative impacts on the safety of local communities is played by ORLEN's Company Fire Brigade, a firefighting unit integrated into Poland's National Firefighting and Rescue System (KSRG). It primarily operates at the production plant in Płock and operates at other sites under service agreements to provide firefighting and emergency response. The Company Fire Brigade also participates in emergency response exercises organised by ORLEN Group companies, both in Poland and abroad. A dedicated Emergency Plan has been developed for the Płock site and agreed upon with the Commander-in-Chief of the State Fire Service in the Province of Warsaw. This plan is reviewed and updated in line with national regulations. Pre-plans, or site-specific operational documents, are developed for each production and storage facility. These serve as operational tools to support decision-making by the Emergency Operations Leader. The Company Fire Brigade is also engaged in preventive fire safety measures, starting from the design phase of new or modernised facilities through to final inspections and commissioning. These specialists are also responsible for fire safety inspections, which are essential in maintaining the safety of both industrial assets and the surrounding communities.

Selected initiatives implemented by the ORLEN Foundation:

- In 2024, the ORLEN Foundation partnered with the Mountain Volunteer Search and Rescue Service (GOPR). A donation of nearly PLN 1.5 million supported rescue operations in 2025 and improved safety in the Polish mountains. ORLEN has been a longstanding supporter of national rescue organisations, including the Masurian Volunteer Search and Rescue.
- In 2025, specialised protective suits with a total value of nearly PLN 140 thousand were donated to the Maritime Search and Rescue Service (SAR).
- The ORLEN on Watch programme provides grants for specialist training, psychological support, and the purchase and insurance of equipment, with the aim of enhancing safety and emergency preparedness. Donations were provided to 368 volunteer and state fire service units.
- The ORLEN for Rescue Dogs programme supports rescue teams working with search and rescue dogs. A total of 42 grants were awarded, supporting 127 teams across Poland.
- The Together for Safety programme focuses on strengthening the resilience and operational capacity of volunteer fire brigades, with grants awarded to 129 units.
- The Safe Eaglets initiative promotes safety education for children by equipping existing State Fire Service training rooms and co-financing new ones. Support was provided to 24 units, with eight new training rooms established.

## Selected projects supporting health protection

As part of our commitment to promoting preventive healthcare and improving access to medical screenings, we implemented the following initiatives in 2025 together with our medical partners, in response to local community needs:

- The free preventive screening programme Get Tested Today for a Healthier Tomorrow for residents of Płock and the Płock district, run from July to December 2025, was an opportunity to take part in monthly screenings and medical consultations. In total, 1,412 people participated in the programme. As part of the programme, a Health Festival offered cardiology consultations with ECG tests, pulmonology consultations with spirometry, and dietetic consultations with body composition analysis. Over two days, 328 people were examined. In response to strong interest, the programme was extended from January to March 2026, and work began on a new health programme scheduled to run from April to the end of 2026.
- The Health Festival organised by the ORLEN for Pomerania Foundation held its pilot edition in Przejazdowo near Gdańsk on 30–31 August 2025. Residents had access to free screenings and consultations with various specialists. The event also included an educational zone (beekeeping and environmental workshops) and a children's zone (educational activities and a cycling safety training area). It attracted over 1,200 participants, who completed more than 2,400 screenings.
- In addition, the ORLEN Foundation supported key medical institutions and research projects. More than PLN 600 thousand was provided to the Children's Memorial Health Institute to modernise the Small Steps Academy rehabilitation centre. The Foundation also funded training for staff of the Obstetrics and Gynaecology Clinic at the Institute of Mother and Child (PLN 100 thousand), delivered at Medway Maritime Hospital in the United Kingdom. Further support for rare disease research included a grant of PLN 200 thousand to the Rett Syndrome Research Trust for gene therapy research for people with Rett syndrome.

## Sponsorship of social initiatives, culture and sports

Selected sports initiatives:

- The Sporting ORLEN programme forms part of our social engagement, addressing declining physical activity among children and young people while supporting amateur sport in Poland over the long term. The first edition in 2025 demonstrated the importance of supporting local sports initiatives. A total of 183 clubs from across the country received funding, including multi-sport clubs (45), volleyball clubs (28), and athletics and swimming clubs (15 each). The funding enabled clubs to organise training sessions and camps, as well as psychological and nutrition workshops. In total, more than 23,000 young athletes participated, supported by 951 coaches and instructors.
- In 2025, ORLEN continued as Strategic Partner of the Sports Eagles Foundation, whose programme encourages children and young people to engage in regular physical activity. Under the Active School programme, activities delivered at municipal sports facilities included From Orlik to the Stadium football tournaments, with 72,000 participants; Handball at Orlik, with over 14,000 participants; Athletics at Orlik, with more than 42,000 participants. In total, the programme reached over 628,000 participants across more than 7,600 schools.
- As Main Sponsor of the Football Plus project, run by the Amp Football Association, ORLEN supports the development of football for children and young people with disabilities. In 2025, 19 events were held as part of the programme. The tournament cycle concluded with a national event in Warsaw, held at the football arena on the campus of the Warsaw University of Life Sciences (SGGW). Over 300 players with disabilities from across Poland took part.
- The Football Future with ORLEN project promotes sport among children by enabling their development within Poland's longest-running youth football programme. It supports equal opportunities for physical development and the pursuit of sporting interests. Summary of Football Future with ORLEN initiatives in 2025:
  - 1,626 matches and tournaments,
  - 10,985 training sessions (nearly 16,500 hours),
  - approximately 3,800 participants,
  - approximately 30,000 items of sports equipment procured,
  - nearly 250 participants in the annual ORLEN Junior Cup,
  - 76 training camps organised by participating clubs.

Selected initiatives in culture:

- In 2025, ORLEN launched the first call for applications under its original Cultural ORLEN programme, aimed at children and young people across Poland. The programme seeks to strengthen local initiatives that, through collaborative artistic projects, foster social connections and support the personal development of young people. The call was accompanied by a nationwide social campaign under the slogan 'Culture energises', highlighting culture as a source of inspiration, community and development, particularly for younger audiences. Nearly 2,800 applications were submitted by cultural institutions, foundations and associations nationwide.
- In 2025, we continued our partnership with the Fryderyk Chopin National Institute, extending our ongoing support for the organisation. The collaboration included major cultural events that attracted large audiences and played a significant role in promoting Polish culture both at home and abroad, most notably the Chopin Competition. The preliminary rounds alone were attended by over 145,000 people, while online broadcasts generated more than 3.6 million views.
- ORLEN also continued its partnership with the National Museum in Warsaw, supporting its exhibition, educational and promotional activities at the main building and its branches: The Xawery Dunikowski Museum of Sculpture at Królikarnia, the Poster Museum in Wilanów, the Museum of Interiors in Otwock Wielki, and the Museum in Nieborów and Arkadia. The partnership covered permanent and temporary exhibitions, special projects and a broad educational offer for diverse audiences.
- We continued our patronage of the Grand Theatre - National Opera, supporting various artistic events across Poland. These included six premieres and the season's flagship event – the world premiere of the opera "The Best City in the World: An Opera About Warsaw".
- In 2025, we extended our collaboration with the Royal Castle in Warsaw, becoming one of its key sponsors.
- We also continued our cooperation with the POLIN Museum, which delivered an extensive programme of educational, cultural and exhibition activities. In March 2025, the temporary exhibition "1945. Not the End, Not the Beginning" opened and attracted over 95,000 visitors. In April, the 13th edition of the Daffodils social and educational campaign took place, involving nearly 700 volunteers, over 6,000 schools, libraries and institutions, and reaching more than 800,000 students across Poland.
- We continued our cooperation with Zachęta – National Gallery of Art as a patron of the institution, supporting its exhibition, educational and international projects. A total of 16 exhibitions were presented, featuring both established artists and premiere works created specifically for the gallery.
- In January 2025, we launched a partnership with the Łazienki Królewskie Museum, supporting key cultural and educational initiatives within this historic palace and park complex.

- From 1 January 2025, we also partnered with the Polish Royal Opera through the “Opera on Tour” series and the We Show the Opera project. “Opera on Tour” aims to broaden access to high culture across Poland, particularly in areas with limited access to professional theatre.

## Other nationwide social initiatives

In 2025, we supported the Great Orchestra of Christmas Charity (WOŚP) for the first time, raising PLN 5,245,485.39 with the involvement of our customers. We contributed in two ways: collection boxes were placed at 1,737 service stations across Poland, and we donated PLN 1 for every coffee sold in January 2025. The Every Coffee Makes a Difference campaign was promoted through a specially designed WOŚP-themed cup, as well as television and billboard campaigns featuring ORLEN Team ambassador Anita Włodarczyk.

## Powering Science programme

- In early May 2025, we established cooperation with the Institute of Biochemistry and Biophysics of the Polish Academy of Sciences, becoming a partner in the Antarctica under ORLEN’s Wing project. The initiative aims to designate a new Antarctic Specially Protected Area (ASPA) in one of the most remote regions of the world. It is intended to lead to the designation of an additional protected area, increasing the extent of protected zones and strengthening Poland’s international position in Antarctic research.
- Last year, once again we acted as a patron of the Explory 2025 – STEAM with Explory competition, the largest event in Poland promoting young talent in science and innovation. We have been a partner of the programme since 2013. The Explory programme, launched in 2012, is the largest initiative in Poland identifying and supporting young talent. Since its launch, the programme has built a community of over 4,000 young talents and supported more than 2,000 innovative research projects and inventions. Nearly 900 students (301 original STEAM projects) applied to the 14th edition in 2025.
- In 2025, the ORLEN Ignacy Łukasiewicz Foundation launched the pilot edition of the TURBOgrant programme aimed at student scientific societies at public universities implementing scientific, educational, development and research projects in the fields of earth sciences and energy, in particular geology, geophysics, environmental engineering, petroleum and gas engineering (including drilling and gas engineering), as well as robotics, automation, mechatronics and related disciplines. The programme aims to support talented young researchers at the early stages of their careers and contribute to the development of future engineering talent.
- In 2025, the Foundation concluded the second edition and launched the third edition of the Engineers of the Future programme, a nationwide grant programme for secondary school students. Participants develop their own research projects in energy-related fields, covering at least one scientific discipline such as physics, chemistry, energy, ecology or environmental protection. The programme culminates in the Nationwide Scientific Conference for Secondary Schools and is delivered in close cooperation with technical universities.

## Fostering engagement through foundations

In 2025, we actively supported the following foundations for which ORLEN serves as the sole founder or one of the founding members:

- ORLEN Foundation, with ORLEN as its exclusive founder,
- ORLEN Foundation for Pomerania, also exclusively founded by ORLEN,
- PGNiG Ignacy Łukasiewicz Foundation, with ORLEN as the sole founder,
- Foundation of the Ignacy Łukasiewicz Oil and Gas Industry Museum in Bóbrka, with ORLEN as a co-founder,
- Grant Fund for Płock Foundation, with ORLEN as a co-founder alongside other partners, including the City of Płock,
- Grow Up With Us Foundation, with ORLEN as a co-founder,
- Polish National Foundation, with ORLEN as a co-founder.

In addition, ORLEN Group companies are the only founders of the following foundations:

- Energa Foundation, with ENERGA as the sole founder,
- Anwil Foundation, with ANWIL as the sole founder,
- ORLEN Unipetrol Foundation, with ORLEN UNIPETROL as the only founder.

## Table 121 Key social initiatives delivering positive impacts for affected communities in 2025

| Key performance indicators | UoM | 2025 |
|---|---|---|
| **Scholarship programme of the ORLEN Foundation** | | |
| Total amount of support provided under the Bona Fide programme | [PLN million] | 2.5 |
| **Educational programmes of the ORLEN Foundation** | | |
| Total amount of support provided under the From Molecules to Galaxies grant programme | [PLN million] | 0.7 |
| Total amount of support provided under the Power of Responsibility grant programme | [PLN million] | 0.8 |
| **Scholarship programmes of the ORLEN Ignacy Łukasiewicz Foundation** | | |
| Scholarships for vocational school students, scholarships for children of deceased employees, and Fire Up About Learning scholarships – total amount | [PLN million] | 0.6 |
| Łukasiewicz Scholarship – amount | [PLN million] | 0.43 |
| **Grant programmes of the ORLEN Foundation** | | |
| Total amount of support provided under the ORLEN on Watch programme | [PLN million] | 20 |
| Total amount of support provided under the Safe Eaglets programme | [PLN million] | 0.5 |
| Total amount of support provided under the ORLEN. Together for Safety programme | [PLN million] | 6 |
| Total amount of support provided under the ORLEN for Rescue Dogs programme | [PLN million] | 0.6 |
| Total amount of support provided under the ORLEN Community Energy programme | [PLN million] | 1 |
| **Grant programmes of the ORLEN for Pomerania Foundation** | | |
| Total amount planned in 2025 under ongoing programmes | [PLN million] | 12 |
| **Grant programmes of the ORLEN Ignacy Łukasiewicz Foundation** | | |
| Total amount of support provided under the FunLab programme | [PLN million] | 4.5 |
| Total amount of support provided under the TURBOgrant programme | [PLN million] | 2.5 |
| Total amount of support provided under the Museum Destination programme | [PLN million] | 1.4 |
| Total project value (including non-grant components) under the EcoAction programme (1st edition) in 2025 | [PLN million] | 1 |
| Total project value (including non-grant components) under the EcoAction programme (2nd edition) in 2025 | [PLN million] | 1 |
| **Educational programmes of the ORLEN Ignacy Łukasiewicz Foundation** | | |
| Total amount of support provided under the Engineers of the Future programme | [PLN million] | 0.2 |
| **Donation programme of the ORLEN Foundation** – total amount of support | [PLN million] | 54.8 |
| **Donation programme of the ORLEN for Pomerania Foundation** – total amount of support | [PLN million] | 8.9 |
| **ORLEN Ignacy Łukasiewicz Foundation annual donation programme** – total amount of support | [PLN million] | 2.2 |
| **ORLEN Foundation employee volunteering programme** – total amount of support (from the Foundation's resources) | [PLN million] | 1.2 |
| **ORLEN Ignacy Łukasiewicz Foundation employee volunteering programme** – total amount of support (from the Foundation's resources) | [PLN million] | 0.3 |
| **Sponsorship projects – sports** – total amount of support | [PLN million] | 219 |
| Sporting ORLEN | [PLN million] | Sponsorship agreements (ORLEN S.A.): 1.5 Donation agreements (ORLEN Foundation): 10.2 Educational activities (ORLEN Foundation): 0.6 |
| Active School | [PLN million] | 4 |
| Football Plus | [PLN million] | 0.8 |
| Football Future with ORLEN | [PLN million] | 3 |
| Legia Soccer Schools | [PLN million] | 0.4 |
| **Sponsorship projects – culture and science** – total amount of support | [PLN million] | 32.9 |
| Cultural ORLEN | [PLN million] | Sponsorship agreements (ORLEN S.A.): 1 Donation agreements (ORLEN Foundation): 9.9 |
| Patronage of the Grand Theatre – National Opera | [PLN million] | 2.4 |
| Eufonie International Music Festival of Central and Eastern Europe | [PLN million] | 0.4 |
| Sponsorship of the Baltic Opera Festival | [PLN million] | 2.5 |
| Sponsorship of the Royal Castle in Warsaw | [PLN million] | 0.5 |
| Patronage of Zachęta – National Gallery of Art | [PLN million] | 1 |
| Sponsorship of OFF FESTIVAL in Katowice | [PLN million] | 0.2 |
| Sponsorship of Special Chopin Concerts | [PLN million] | 0.05 |
| Sponsorship of the Inside Seaside Festival | [PLN million] | 0.3 |

* Information on the scope of projects and programmes is provided in disclosure S3-4 and on the websites: fundacja.orlen.pl and orlen.pl.

### 6.10.5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [S3-5]

The ORLEN Group has not yet established measurable, time-bound and outcome-oriented targets. However, work is ongoing to define such targets, with completion planned for 2026. The process takes into account identified impacts, risks and opportunities (IROs), as well as the interests of key stakeholders.

As part of our Sustainable Development Strategy, we have set strategic priorities under the Communities pillar for 2025–2030, along with longer-term ambitions beyond 2035. Designated

coordinators at ORLEN S.A. oversee the development, implementation and monitoring of related initiatives in line with segment-based management principles. They also coordinate activities across Group companies in cooperation with local coordinators. Coordinators participate in regular workshops covering all aspects of initiative development and implementation. The defined priorities are directly aligned with the Charitable Policy and the Community Relations Management Policy. Progress in implementing strategic initiatives is monitored and reported twice a year. Reports are presented to the Management Board and subsequently approved by the Sustainability Committee of the Supervisory Board.

Our plans for affected communities in 2026 focus on three key areas: engagement with local communities, just transition, and sustainability education.

### Engagement with local communities (initiatives underway):

Implementing a comprehensive local community communication system by:

- Developing the Local Community Relations Officer role,
- Developing and promoting a system to manage issues submitted by local communities,
- Updating the ORLEN Group Community Relations Management Policy,
- Developing the ORLEN for Science, ORLEN for Culture, ORLEN for Sports and ORLEN as a Good Neighbour programmes.

### Just transition (initiatives underway):

- Developing a Just Transition programme by:
  - Analysing and identifying the needs of residents in areas affected by the energy transition,
  - defining objectives of the Just Transition programme for key areas that require support: our workforce, local communities, business partners, and customers,
- building an offering to support the transition of Polish cities and municipalities through the ORLEN for Cities initiative.

### Sustainability education (initiatives underway):

- Integrating sustainability principles into the core programmes addressed to our customers, workforce, children and youth, and local communities,
- Delivering dedicated sustainability awareness campaigns,
- Implementing an environmental protection programme involving collaboration between corporate foundations and representatives of communities in areas of high natural value.

## 6.11 Consumers and end-users [ESRS S4]

### Interests and views of stakeholders [S4. SBM-2]

The focus of our activities is on identifying and responding to the needs of consumers and end-users. This approach ensures that all key areas of the Group's activities – from the design and development of products and services, through communication and marketing, to customer service processes – are consistently informed by considerations relating to consumer safety and satisfaction. Across our operations, we implement solutions aimed at ensuring product and service quality, as well as compliance with the requirements related to energy efficiency and lifecycle safety.

Evolving consumer needs, including a shift towards a prosumer model – characterised by active and informed users of products and services – are a key driver of the parallel evolution of the ORLEN Group's business model. The model is realigned at the level of individual Group companies, where due account is taken of the specific characteristics of the retail customer segments they serve. In response to these developments, in 2025 we continued to enhance our product and service offerings for retail customers. Our initiatives were focused on improving their accessibility and usability, advancing self-service solutions, and further enhancing the overall customer experience. Details of selected adjustments we made in 2025 to our offerings and operational solutions in response to retail customer expectations are provided in disclosure S4-4.

The strategic direction for our activities targeting end-users is defined at the ORLEN Group level within the Consumers & Products segment, with due consideration given to applicable legal requirements, in particular the consumer protection regulations. These strategic priorities are implemented at the country level, ensuring alignment with Group-level decisions as well as compliance with local regulatory frameworks and market conditions. The implementation process is underpinned by systematic integration of feedback from consumers and end-users, and further informed by ongoing analysis of their evolving needs and expectations. Customer views obtained through available touchpoints, satisfaction surveys, and behavioural analysis constitute a key source of insights we rely on to enhance our product and service offerings and to design new convenience-enhancing solutions within our retail infrastructure.

### Material impacts, risks and opportunities and their interaction with strategy and business model [S4. SBM-3]

Our operations generate material impacts on the natural environment, society and the economy, as reflected in the outcomes of the double materiality assessment for consumers and end-users. The material impacts, risks and opportunities we identified through the materiality assessment relate in particular to data privacy of consumers and end-users, access to quality information, health and safety aspects of product use, accessibility of products and services, energy security, as well as responsible sales and marketing practices. These areas are intrinsically linked to the ORLEN Group's strategy

and business model, which is rooted in large-scale industrial operations and the provision of essential products and services to a broad customer base across domestic and international markets. As a result of these dependencies, the Group's influence on consumers is extensive and embedded in the wide product availability, long-term customer relationships, and a sustained focus on quality and safety.

The rapid pace of technological advancement, increasing pressure for digitalisation, the adoption of new business models associated with the energy transition, the rising importance of ESG factors, intensified efforts to improve energy efficiency, the signing of the Effective Transformation Charter, as well as the diversification of energy sources, and the decarbonisation process continue to reshape the Group's strategic direction and business model. These dynamics give rise to both risks and opportunities. Key risks include those related to personal data protection, product safety, and the continuity of access to fuels and energy amid geopolitical volatility. Conversely, significant opportunities arise from our efforts to strengthen energy security, advance the energy transition, ensure wide availability of our products and services, and reinforce customer trust and loyalty.

Potential negative impacts on consumers and end-users have not been assessed by the ORLEN Group as widespread or systemic. Where they occur, they are incidental in nature and effectively mitigated through our established internal standards, procedures and management systems.

An essential component of the ORLEN Group's strategy is to develop digital solutions in response to evolving customer expectations and the growing uptake of digital channels to access products and services. 2025 Marked a significant step forward in the deployment of cloud technologies and artificial intelligence, both within our internal operations and in customer-facing applications. This direction creates material opportunities to enhance customer experience, broaden the product offering, and improve operational efficiency. At the same time, it introduces risks related to data security, business continuity, and customer trust.

In response, we systematically integrate digital development into our business model, partnering with established and reputable technology providers while implementing robust internal procedures to manage operational and cybersecurity risks. This approach allows us to harness the benefits of advanced technologies – such as improved service quality, personalised offerings sought after by customers, and optimised processes – while maintaining high standards of security and service reliability. Recognising the risk of digital exclusion of some customers, we additionally develop alternative solutions to ensure accessibility. In particular, dedicated processes within our Contact Centre support customers who, having no access to digital tools, are unable to benefit from digital-only promotional offers or services.

The ORLEN Group identifies positive impacts in relation to the accessibility of communication and feedback channels for consumers and end-users, supported by the provision of multiple channels through which they can raise concerns and structured processes for handling and responding to such submissions, as described in disclosures S4-2 and S4-3. Additional positive impacts include safety education initiatives for children, most notably the Energa-Operator Safe Land programme delivered by the ENERGA Group, broad access to products and services through the continuous alignment of our offerings with customer needs, as well as contributions to strengthening energy security and supporting a just transition. The actions taken in relation to these positive impacts are detailed in disclosure S4-4. The identified positive impacts apply across all consumer and end-user groups recognised by the ORLEN Group.

In our interactions with consumers and end-users, we consistently apply responsible marketing practices and ensure access to reliable and clear information. Potential risks associated with inadequate communication are mitigated through transparent disclosure standards, oversight of marketing content, and strict adherence to applicable regulations. This approach not only reduces reputational risk we could otherwise face, but also strengthens customer trust. Consistent, responsible communication remains a cornerstone of building the ORLEN brand credibility and fostering long-term customer loyalty.

## Characteristics of customers and end-users

Disclosures under ESRS S4 cover all consumers and end-users in direct relationships with companies of the ORLEN Group, including those using the Group's fuel or non-fuel products and services, post-sales customer support, or available communication and contact channels.

### Within the scope of these disclosures, the following main categories of consumers and end-users were identified:

- customers of service stations, who use our fuel products and services and non-fuel offerings, including food and beverages, convenience goods, and additional services such as car washes,
- customers of electric vehicle charging stations,
- household end-users purchasing electricity and/or gas, who also qualify as end customers as defined in the Energy Law,
- users of courier services,
- customers using e-commerce platforms and mobile applications, and
- recipients of communications disseminated via channels such as press, television, radio, and outdoor advertising.

Table 122 Groups of consumers and end-users included in the scope of the ORLEN Group's reporting who are particularly vulnerable in the context of negative impacts

| Impact | Description of the group of consumers and end-users |
|---|---|
| Use of products that are inherently harmful to people and/or may increase risks for adverse health impacts. | Customers using our fuel products, due to potential exposure to vapours and explosion risks, as well as customers purchasing certain non-fuel goods available at our service stations, such as tobacco products, alcoholic beverages, and energy drinks. Use of fuels and gas, especially without due caution, may involve a risk of burns or poisoning. We place a strong emphasis on compliance with applicable health and safety standards and on ensuring that consumers are provided with all relevant information. |
| Potential negative impact on rights to privacy and protection of personal data. | This group includes, in particular, participants of the VITAY loyalty programme, users of the vitay.pl e-commerce platform, and users of mobile applications. Potential impacts on consumer privacy may also arise from the operation of video surveillance systems at ORLEN service stations, where personal data such as images or vehicle registration numbers may be processed. Terms and conditions of service and privacy policies are in place for our websites and mobile applications, while promotional campaigns are governed by dedicated rules. |
| Availability of accurate product or service information in order to avoid potentially harmful ways of using it. | Customers using our petroleum-based products, electricity and gas, electric vehicle charging services, non-fuel services, courier services, or ancillary services such as car washes. Consumers are properly informed about the characteristics of our products and services, as well as any hazards associated with their use. Products available at service stations are labelled in accordance with applicable regulations, including fuel marking requirements and allergen information for food products. The communication includes prominently displayed instructions on how to use car washes, refuelling stations and electric vehicle charging stations (also in the application). In the case of courier services, instructions are provided via email, SMS and notifications in the mobile application. |
| Marketing and sales strategies and health or privacy impacts. | Consumers particularly vulnerable to communication practices and marketing strategies, including purchasers of tobacco products, alcoholic beverages, and energy drinks. Such products are sold exclusively to adults who are not under the influence of intoxicating substances. We provide dedicated training for service station staff on responsible sales practices. In addition, point-of-sale systems include mechanisms supporting compliance with these practices. |

As part of the ORLEN Group's double materiality assessment, we also identified consumers and end-users with particular characteristics making them more susceptible to potential social impacts, who require heightened attention. This group includes, in particular, children and young people, for whom an actual positive impact was identified in the area of protection and education.

The identified impacts, risks, and opportunities relating to consumers and end-users are closely linked to the ORLEN Group's strategy and business model. Their systematic integration into our decision-making processes supports the pursuit of the Group's long-term goals, including the development of a resilient, secure and sustainable business model grounded in consumer trust, high-quality offerings, and a responsible approach to customer relationships.

## Table 123 Double materiality assessment summary for consumers and end-users [S4.IRO-1]

| Segment | Area | Geographical region | S4<br>Risk, opportunity, impact | Impact (I)<br>Risk (R)<br>Opportunity (O) | Positive (+)<br>Negative (-) | Actual (A)<br>Potential (P) | Value chain<br>Organisation (O)<br>Downstream (D)<br>Upstream (U) |
|---|---|---|---|---|---|---|---|
| Upstream & Supply, Downstream, Consumers & Products | Refining, Petrochemicals, Gas, Retail | Europe+North America+Libya+Pakistan+Middle East | **Privacy of consumers and end-users** | | | | |
| | | | GDPR-related incidents | I | - | P | D |
| | | | Costs of non-compliance with the General Data Protection Regulation (GDPR) | R | | | D |
| | | | Reputational damage and customer loss resulting from personal data breaches | R | | | D |
| | | Poland | **Freedom of expression for consumers and end-users** | | | | |
| | | | Availability of communication channels and concern-raising mechanisms for consumers and end-users | I | + | R | O, D |
| | | Europe | **Access to (quality) information** | | | | |
| | | | Inadequate communication about products and services offered | I | - | P | O, D |
| | | | Penalties for misleading consumers, greenwashing or other actions contrary to applicable laws | R | | | O, D |
| | | | **Security of a person** | | | | |
| | | | Failure to adequately secure energy requirements | I | - | P | O, D |
| | | | Risk of disruption to continuity of energy supply | R | | | O, D |
| | | | **Protection of children** | | | | |
| | | | Safety education for children | I | + | R | O, D |
| | | | **Access to products and services** | | | | |
| | | | Broad availability of offered products | I | + | R | O, D |
| | | | Disruptions in access to products and services | I | - | P | O, D |
| | | | Building customer loyalty and trust by ensuring access to products and services, including those produced in a sustainable manner | O | | | O, D |
| | | | Loss of revenue due to geopolitical instability | R | | | O, D |
| | | | Improving energy security and ensuring just transition | I | + | P, R | O, D |
| | | | **Health and safety of consumers and end-users** | | | | |
| | | | Penalties for non-compliance with product safety standards | R | | | O, D |
| | | Globally | **Responsible marketing practices** | | | | |
| | | | Strengthening brand credibility, translating into higher sales and customer loyalty | O | | | O, D |

| | | short-term | medium-term | long-term |
|---|---|---|---|---|
| Privacy of consumers and end-users | R | ✓ | ✓ | ✓ |
| | R | ✓ | ✓ | ✓ |
| Access to (quality) information | R | ✓ | ✓ | ✓ |
| Access to products and services | O | ✓ | ✓ | ✓ |
| | R | ✓ | ✓ | ✓ |
| Health and safety of consumers and end-users | R | ✓ | ✓ | ✓ |
| Security of a person | R | ✓ | ✓ | ✓ |

### 6.11.1 Policies related to consumers and end-users [S4-1]

The policies in force at the ORLEN Group in relation to consumers and end-users address material impacts, risks and opportunities identified within this area, including matters related to consumer rights, personal data protection, access to reliable information, product/service safety and quality, responsible marketing practices, as well as the protection of human rights and vulnerable groups, including children. These policies reflect the nature of our interactions with consumers and end-users, serving as a source of consistent standards of conduct applicable across the organisation.

Their applicability extends to all companies forming part of the ORLEN Group and to the Group's operational activities in its interactions with consumers and end-users, both in Poland and on international markets. These policies apply broadly to all consumers and end-users, though specific solutions may be tailored to particular groups, such as service station customers, customers using electric vehicle charging services, mobile app users, retail customers in e-commerce channels, or electricity end-users. The scope of these policies, standards and procedures covers the Group's entire operations, from production and distribution to retail sales at service stations and e-commerce platforms, and extends to both upstream and downstream value chain segments. Relevant activities are carried out across various geographic regions, with consideration for the specifics of local markets and impacts on the interests of key stakeholder groups, including suppliers, contractors and local communities.

Responsibility for the establishment and implementation of policies relating to consumers and end-users rests with the Management Boards of the respective Group companies, under the operational oversight of Directors in charge of relevant functional areas. As part of this remit, they must ensure compliance with applicable laws, internal regulations and international standards and guidelines, while maintaining the consistency of approaches across the Group.

The policies have been developed taking into account stakeholder expectations, including those of consumers and end-users, industry organisations and supervisory authorities. Stakeholder interests are incorporated through ongoing dialogue with customers, analysis of customer complaints and issues, consultations, and monitoring of regulatory and market developments.

All consumer- and end-user-related policies are available on the websites of ORLEN S.A. and other Group companies, and through our mobile applications. Instructions for using services offered at our service stations are also readily accessible. For employees and key contractors, the policies are communicated through training, workshops, information sessions, and internal communication channels. Business partners and suppliers are contractually bound to follow specific ethical and operational standards.

The application of the policies is subject to systematic monitoring, which includes analysis of customer complaints and issues, legal compliance assessments, oversight of personal data protection, monitoring of marketing activities, and evaluation of the implemented measures. The monitoring process also involves identification of areas requiring corrective or improvement actions.

ORLEN Group companies pursue certifications to confirm compliance with recognised international standards, which directly contributes to the safety and protection of consumers and end-users. Certifications held by the Group include:

- ISO 9001 Quality Management System,
- AQAP 2110 Quality Management System,
- ISO 45001 OHS Management System,
- ISO/IEC 27001 Information Security Management System,
- HACCP Food Safety Management System.

Group companies implement organisational and technical measures to ensure the security of personal data and to enable consumers to exercise their rights. This is supported by the Group Information Protection Policy, governing access to various categories of information, and the Personal Data Security Policy, defining principles for the processing and safeguarding of personal data. In addition, Group companies both contribute to and apply codes of best practice developed by third-party organisations such as industry associations, alliances, foundations and other industry or sector bodies, for example the Responsible Business Forum. Our approach to human rights is grounded in internal regulations, national legislation, and internationally recognised standards and guidelines. These include:

- Universal Declaration of Human Rights,
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, based on core ILO conventions,
- UN Guiding Principles on Business and Human Rights – the 'Protect, Respect, Remedy' framework,
- OECD Guidelines for Multinational Enterprises,
- International Finance Corporation (IFC) Performance Standards,
- Ten Principles of the United Nations Global Compact.

We exercise due diligence to ensure that human rights are respected both within our own operations and in our business relationships. The relevant guidance is provided in the ORLEN Group Human Rights Policy, which highlights our commitment to avoiding any actions that could infringe on human rights, whether internally among employees or externally across our value chain. Mechanisms such as contractor and supplier screening systems and whistleblowing procedures have been established to identify and address potential human rights risks. During the reporting period, there were no severe human rights issues or incidents involving consumers or end-users at the ORLEN Group that would

constitute breaches of the UN Guiding Principles, ILO standards or OECD Guidelines. The policies described above are linked to impacts on the security of a person and protection of children.

At the ORLEN Group, we allow for remedial measures to be applied and implemented in the event of actual or potential human rights breaches.

Existing policies and procedures related to consumers' and end-users' freedom of expression include: the Human Rights Policy, Personal Data Protection Policy, Procedure for Handling Grievances and Complaints, as well as a set of regulations governing our marketing practices and access to services, which define the framework for remedial action and responses to reported concerns. Consumers, end-users and other stakeholders are provided with multiple channels through which they can raise concerns, as described in disclosures S4-2 and S4-3. All submissions are reviewed and verified, with applicable procedures in place to ensure that individuals submitting reports in good faith are protected against retaliation. Where irregularities are identified, we implement appropriate corrective and remedial measures, commensurate with the breach, ranging from operational improvements and adjustments to customer service standards, to measures addressing root causes and preventing recurrence, as described in more detail in disclosure S4-3.

Policies governing the Group's impact on access to products and services include: the Integrated Management System Policy, covering quality, safety, legal compliance and continuous improvement of processes involved in the provision of products and services, the Energy Policy, defining the framework for ensuring the continuity and security of energy supply and for efficient management of energy resources, the Food Safety Policy, establishing standards for the quality and safety of food products offered to customers, and the ORLEN Group Environmental Protection Policy, addressing environmental impact mitigation and responsible production and distribution.

The ORLEN Group is committed to ensuring that products and services meet all requirements, seeking to continually improve workplace safety, and fulfilling all requirements related to the security of information processed at the ORLEN Group. Responsibility for developing and implementing policies in key areas, such as privacy, freedom of expression, access to information, health and safety, security of a person, protection of children, non-discrimination, access to products and services, responsible marketing practices, and food safety, rests with the respective Management Boards of the Group companies.

As regards responsible marketing practices, we have implemented an anti-greenwashing procedure to mitigate the risk of misleading ESG-related communications. This framework comprises the Responsible Communication Code and the ORLEN Group Environmental Communication Policy, referenced by workforce members for relevant guidelines and best practices. These processes are overseen by a dedicated greenwashing prevention team.

**Additionally, at the Group level, the following documents apply:**

- ORLEN Group Code of Ethics (which covers access to products and services by underlining the obligation to ensure high quality and minimise negative impacts),
- Competition Law Compliance Policy,
- Organisational Standards for ORLEN Group companies,
- Hazard Analysis and Critical Control Points (HACCP) Manual (at service stations),
- Good Hygiene Practice and Good Manufacturing Practice Guidelines (at service stations),
- Systems and procedures governing product safety and access to food information,
- Advertising Code of Ethics issued by the Advertising Council.

The policies established by the ORLEN Group in relation to consumers and end-users constitute a coherent governance framework, supporting a consistent and responsible approach to customer relationships across all areas of our activities. Their practical implementation is based on continuous compliance monitoring, analysis of consumer feedback, and ongoing improvement of organisational and operational solutions. These policies allow us to effectively align our activities with the evolving regulatory and market conditions, while maintaining consistent standards for the protection of consumer and end-user rights. As a result, the Group maintains a robust, transparent and accountable framework governing its customer relationships, fully aligned with applicable legal requirements and internationally recognised standards.

### 6.11.2 Processes for engaging with consumers and end-users about impacts [S4-2]

The ORLEN Group regularly engages with consumers and end-users to obtain feedback and identify customer needs and expectations. This information is then used in our decision-making processes and to enhance our offering.

Customer feedback constitutes a key input to the ORLEN Group's operations that is systematically incorporated both into our day-to-day service delivery and into longer-term planning across operational, product and marketing areas. Operational responsibility for managing our engagement with consumers and integrating outcomes into the Group's approach rests with specialised organisational units whose remits are relevant to customer relations. These include, in particular, customer service functions, marketing units, the Retail Network Customer Standards and Relations Department at ORLEN S.A., as well as operational units responsible for product and service quality. Overall operational accountability for ensuring effective engagement with consumers and end-users – and for embedding its outcomes into decision-making – rests with the Executive Director in charge of retail sales and customer service within the Group's management structure. Strategic oversight is exercised by the Management Board, which considers insights derived from customer dialogue in performance reviews, development plans and broader management processes.

The key tool for understanding customer expectations and perceptions consists in regular market and opinion research, conducted across all our retail markets. It results in a series of reports, such as 'Consumer Attitudes and Behaviour', 'Brand Performance' and 'ORLEN Brand Reputation', which provide both trend-based information on how customer attitudes change over time and assessment of customer perceptions of the Group's offerings, pricing and communication activities. There is also a standardised consumer research framework (including Usage & Attitude and Brand Performance studies) covering all our retail markets, with findings in the form of reports used to inform key business and marketing decisions.

These insights are complemented by the 'Voice of Customer' satisfaction survey programme run within the ORLEN retail network, which measures customer experience using the Net Promoter Score (NPS), along with satisfaction ratings across specific aspects of service station performance. Areas assessed include staff courtesy, service speed, employee competence, and cleanliness of the forecourt, station facilities, and restrooms. The survey is run among participants of the VITAY loyalty programme, with several dozen thousand responses collected monthly, analysed and used to identify areas for improvement.

In parallel, customer feedback is continually analysed following telephone helpline interactions, through satisfaction surveys, and via reviews published online. Where appropriate, direct contact is established with customers to provide support or investigate reported issues. In addition, satisfaction surveys following visits to Customer Service Offices are conducted in cooperation with an external advisory firm. One example of in-depth customer insight analysis was the myORLEN Household Customer Satisfaction Survey carried out in May 2025 to comprehensively evaluate service quality and customer service processes across different touchpoints. The results indicated that 80% of household customers were satisfied with the company's services, with an NPS of 40 (56% promoters and 16% detractors).

The ORLEN Group actively monitors customer feedback across digital channels, including Google, Google Play, the App Store and social media platforms. Both qualitative feedback (comments) and quantitative indicators (ratings and their distribution across Customer Service Offices) are analysed and reported. Our marketing activities are similarly informed by customer insights, including testing of advertising materials such as television campaigns. The insights gathered are used to optimise our product and service offerings, upgrade and improve the technical condition of service station infrastructure, and enhance customer service standards. Customer feedback also informs updates to our operational procedures and the provision of additional training for service station and customer service staff.

This engagement is conducted both directly and indirectly – through credible consumer representatives. We engage, in particular, with relevant consumer protection authorities, including the Polish Office of Competition and Consumer Protection (UOKiK) and Energy Regulatory Office (URE), which represent consumer interests and provide insight into their situation. Submissions received via these institutions are prioritised within our established customer service processes. In addition, myORLEN engages with organisations representing vulnerable consumer groups, including MIGAM, to ensure service accessibility for individuals with hearing impairments.

### 6.11.3 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns [S4-3]

Our approach to remediation is guided by internal policies and procedures, such as the Personal Data Protection Policy, or the Procedure for Handling Grievances and Complaints of Retail Network Customers. These frameworks define how we respond to consumer issues and complaints, and how we implement corrective and remedial actions related to operational standards and to product and service quality. In the Call Centre environment, call activity is monitored online, recorded conversations are regularly reviewed, and cases logged in the CRM system are analysed. As part of the formal process we adopted for handling customer issues and requests in the distribution and emergency areas, we regularly assess the quality of responses to concerns raised. Each month, a random sample of submissions is reviewed, with conclusions from their analysis used to improve service quality and, to the extent possible, better align with customer expectations. Quality assurance is also an integral part of the operations at the Telephone Contact Centre, which includes an emergency line (991) and a general customer support line (801 404 404). Random call reviews and weekly operational meetings allow the team to promptly implement corrective measures where necessary.

The practical application of these mechanisms is reflected, for instance, in the customer service model implemented by myORLEN, where customer touchpoints include a network of 128 Customer Service Offices across Poland, a dedicated helpline available Monday to Friday between 7:00 a.m. and 7:00 p.m., as well as the eBOK online platform and mBOK mobile application. These channels are complemented by digital solutions, including BOT support outside helpline operating hours, a chatbot available on the company's website, as well as traditional mail, email and social media channels.

In the event of potential consumer rights violations, including issues related to freedom of expression, access to information, personal safety, protection of children, non-discrimination, access to products and services, or responsible marketing practices, we ensure that customers have access to a variety of reporting channels, including:

- online complaint and feedback forms on the websites of ORLEN Group companies,
- telephone contact,
- dedicated email addresses,
- traditional mail sent to company addresses,
- official social media profiles,
- in-person reporting of issues and complaints at service stations or Customer Service Offices.

These channels are available to customers to share feedback, report issues, and raise concerns about products, services, or Group companies' activities. All submissions are reviewed, enabling appropriate investigative or remedial actions to be taken, in line with our commitment to consumer rights and high service standards. Internal regulations applicable across the Group ensure that individuals submitting reports in good faith are protected against retaliation. We also promote the accessibility of relevant mechanisms for raising concerns within our business relationships by requiring partners to comply with the Human Rights Policy and other applicable policies, as described in detail in the S2-1 section.

Delivering high-quality products and services while upholding strong safety standards remains our top priority. In keeping with our focus on transparency, we take proactive steps to prevent industrial accidents, minimise environmental impacts, and protect human life and health. Should a risk arise, appropriate remedial measures are implemented immediately. We also work closely with law enforcement agencies to strengthen security at our service stations, particularly by addressing potential threats and monitoring higher-risk areas.

In cases involving personal data protection breaches reported to the Data Protection Authority, we specify the preventive and remedial measures that have or will be implemented to prevent recurrence. These measures are then evaluated for effectiveness by assessing whether similar issues or legitimate complaints have ceased, or if there has been a decrease in incident rates compared with previous years. Another form of tracking effectiveness is systematic monitoring and proactive 'stress testing' of risk areas.

Regular performance assessments help us adjust our activities to reflect the needs of consumers and end-users, respond to global challenges, and meet stakeholder expectations. By maintaining a strong focus on transparency and sustainability, we intend to foster long-term growth and strengthen our position as a responsible market leader.

The effectiveness of channels we have made available for raising concerns, grievances and complaints is assessed based on their actual use, including the volume and nature of submissions received across individual channels, response times, and customer satisfaction metrics. The availability of these channels is communicated to consumers and end-users via websites, mobile applications, Customer Service Offices and helplines.

### 6.11.4 Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions [S4-4]

The ORLEN Group regularly advances initiatives designed to enhance customer service processes with a continuous focus on improving the quality, overall performance and reliability of products and services. Actions taken in relation to consumers and end-users are closely aligned with the material impacts, risks and opportunities (IROs) identified through our double materiality assessment (DMA). These encompass, in particular, risks associated with product/service quality and safety, the availability and continuity of supply, the protection of personal data and privacy, access to transparent information and mechanisms for raising concerns, as well as the safeguarding of vulnerable groups, including children and people with disabilities. Concurrently, these actions allow us to pursue opportunities related to service excellence, digital innovation and the strengthening of long-term consumer trust.

In addressing the identified negative impacts and risks, we apply a structured framework of preventive, mitigating and remedial measures, grounded in established internal policies and procedures, including those that govern the handling of customer complaints, issues and requests, personal data protection and user safety. These measures are intended to minimise the risk of consumer rights infringements, enhance service delivery and ensure full compliance with applicable regulatory requirements. An important focus area is the management of risks associated with customer experience and service quality. They are addressed through systematic monitoring of consumer feedback, analysis of customer satisfaction indicators, including the Net Promoter Score (NPS), evaluation of service performance across the Call Centre channels, and review of feedback sourced from digital platforms. This integrated approach allows us to identify areas for improvement and implement targeted corrective actions, by means of which we also capture the opportunity for reinforcing our positive impacts through enhanced service standards and accessibility.

With respect to risks associated with access to products and services and user safety, including the protection of children, we implement measures to ensure both the safe use of our infrastructure and the continuity of service delivery. These include the deployment of technical and organisational safeguards at service stations, ongoing incident monitoring, and close cooperation with competent authorities and institutions. As regards the protection of children and continuity of energy supply, initiatives undertaken across our Group – particularly within the energy segment – are based on solutions developed and advanced mainly by ENERGA, focused on preventing supply disruptions and mitigating potential adverse consequences for end-users.

Where actual negative impacts occur, remediation processes include the analysis of reported cases, the implementation of corrective actions, timely responses to customers and, where appropriate, the application of adequate remedies. These actions aim to both address the immediate consequences of identified issues and mitigate the risk of recurrence. The mechanisms in place support the achievement of objectives embedded in various policies applicable across the Group, in particular those relating to the protection of consumer rights (including human rights) and service quality. In 2025, there were no serious human rights issues or incidents involving consumers or end-users at the ORLEN Group, as described in more detail in disclosure S4-1.

The effectiveness of our actions, as well as progress in managing material risks and opportunities, are subject to ongoing evaluation based on both qualitative and quantitative data that are available, including trends in the volume and nature of customer submissions, customer satisfaction findings,

service quality metrics, and incident recurrence information. Insights derived from this analysis inform continued process improvements and the refinement of our operational practices in subsequent reporting periods.

No significant separate capital or operating expenditure related to consumers and end-users was identified. As a rule, resources allocated to the actions described below are included in spending as part of operating or investing activities of the respective Group companies.

The ORLEN Group further ensures that their own practices, including those related to marketing, sales and personal data processing, do not cause or contribute to material negative impacts on consumers and end-users. This is achieved through the application of transparent data governance principles, oversight of marketing communications, and strict regulatory compliance. While we acknowledge the potential for inherent tensions between our business objectives and the prevention of negative impacts, the pursuit of business performance – including sales growth targets – is not undertaken at the expense of consumer safety or rights. This commitment is reflected in the ORLEN Group's actions in relation to key areas, including responsible marketing, data privacy, sales practices, customer service and the protection of children, as described below.

**Selected actions by area:**

Privacy of consumers and end-users

As part of the sustainability strategy for the ORLEN Charge area in the ORLEN VITAY application, a dedicated information page has been made available on the orlencharge.pl website to facilitate a seamless transition of functionalities, providing clear guidance on the migration process. In parallel, updated terms of use for the ORLEN Charge segment are being developed to reflect the migration of functionalities and evolving user experience. In the area of fleet customer service, comprehensive guidance has been introduced to support the creation of user accounts and the ordering of RFID cards via the fleet management portal. In addition, user-friendly operating instructions are available at each charging station.

Security of a person

To ensure personal safety, a range of technical security systems have been installed at all service stations, including anti-intrusion and panic alarm systems connected to professional security service providers for rapid emergency response. Video surveillance is in place both inside and outside station facilities, including at hydrogen refuelling and EV charging stations. On-site pedestrian and vehicle traffic is governed by established safety protocols and supported by luminous signage, further improving site safety. The effectiveness of our remediation measures is evaluated using various customer service monitoring tools, such as tracking incoming feedback (via contact forms, public email addresses), assessing quality KPIs, and applying Call Centre-specific tools like call monitoring and calibration sessions.

Access to products and services

The ORLEN Group is implementing initiatives aimed at aligning its offers to the needs of consumers and end-users and thereby maintain a high level of satisfaction with our products and services, build customer loyalty and trust by ensuring uninterrupted access to products and services, including sustainably produced products and services, and continuously enhance customer experience across sales and service processes. This also includes minimising the risk of disruptions in access to products and services, whether arising from operational or geopolitical factors. The measures we take cover both our operations and our relationships with the external environment, in particular ensuring the functioning of sales channels and information mechanisms that make it easier for customers to use our products and services. In practice, these measures span sales processes, customer service in our retail network, the development of non-fuel services, e-mobility and the alternative fuels offering, as well as initiatives aimed at reducing barriers to the use of electric vehicle charging services and improving user comfort.

Examples of measures we took in 2025 in response to customer expectations include:

- improvements to car washes: greater user comfort, standardised wash programmes and a higher share of recycled water,
- rollout of DualPOS self-checkouts in retail sales,
- expansion of e-commerce: integration with VITAY, new application modules and ORLEN ID login;
- modernisation of the Flota portal and development of e-mobility services,
- expansion of Energa Obrót's renewable energy offering,
- development of the myORLEN service offering: modern heating appliances, assistance, safety and energy efficiency,
- work on safety services: threat monitoring, chimney sweeping services and the Virtual Safe,
- strengthening customer service: educational channels and support for seniors and persons with disabilities,
- introduction of the lower-emission HVO100 Diesel fuel in selected markets,
- development of digital tools: eBOK, mBOK, e-invoices and chatbots.

Protection of children

The ORLEN Group also identifies customer groups requiring special attention, including children and young people, in relation to whom we generate positive impacts in the areas of protection and education. Such actions are undertaken, for instance, at the ENERGA Group and include its educational initiatives, with the flagship Energa-Operator Safe Land programme, which aims to increase awareness among children and adolescents regarding electricity while promoting safe behaviours in its use. Its focus is in particular on raising awareness of risks associated with unsafe

conduct in the vicinity of electric energy infrastructure and on providing practical guidance on the safe use of electricity. The initiative is delivered through educational events and school-based activities, utilising interactive learning formats such as demonstration exhibits and hands-on experiments designed to actively engage participants. These in-person activities are complemented by a dedicated educational platform offering e-learning materials for children and teaching support resources for educators. In total, 3,752 children took part in events and meetings at schools in 2025. The programme has been running for over 20 years.

Health and safety of consumers and end-users

Products and services offered by the ORLEN Group are required to meet defined quality and safety standards. With respect to food services, a HACCP-based framework has been implemented, governing operational processes related to food safety. In the event of an incident, remedial actions are taken at the level of individual sales points, or – where broader risks are identified – corrective measures are implemented at a systemic level to prevent recurrence.

Responsible marketing practices

The ORLEN Group conducts its marketing activities in accordance with applicable ethical standards, whilst respecting the needs and rights of consumers. Particular emphasis is placed on the social responsibility of published content and on avoiding the promotion of unhealthy habits. Marketing communications are conducted in accordance with the internal Code of Responsible Communication and the Code of Advertising Ethics drawn up by the Advertising Council, whilst promotional campaigns conducted online are accompanied by promotional terms and conditions. The ORLEN Group has also developed and implemented Environmental Communication Guidelines, aimed at ensuring reliable, precise and verifiable messaging on environmental issues and reducing the risk of greenwashing. This communication is conducted in a clear, consistent and understandable manner, taking into account the full context and all formats used. A dedicated greenwashing team oversees the processes and carries out mandatory content verification. To raise employee awareness of responsible marketing practices, e-learning courses and training sessions dedicated to specific areas are provided. Should any breaches of the principles of responsible communication or environmental communication be identified, the ORLEN Group may decide to suspend ongoing marketing campaigns.

### 6.11.5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [S4-5]

As at the reporting date, we had not established any formalised, measurable and time-bound targets relating to consumers and end-users in line with the ESRS MDR-T requirements. Our activities to date have focused on defining strategic directions, standards and operational initiatives in areas pertaining to customer relationships, including the mitigation of material negative impacts, the pursuit of opportunities and the management of consumer-related risks. In the next five years, we plan to set targets consistent with the MDR requirements.

The process of defining key actions in relation to consumers and end-users is informed by an assessment of the performance of customer-facing B2C sales and service channels, the Group's transformation initiatives, and our new customer-centric Process Architecture. Customer perspectives are incorporated through a review of data from customer service channels, customer satisfaction surveys, as well as work to define the buyer personas and map the buyer journeys.

Our ambitions in managing impacts and developing consumer offerings

- **Mitigating consumer risks** related to product safety, service accessibility and barriers to the use of products and services.
- **Minimising user errors** through the provision of clear, reliable and user-friendly information, particularly for new services and technologies.
- **Reducing potential negative impacts on end-users**, while also limiting reputational, regulatory and operational risks for the Group.
- **Ensuring a high level of personal data protection and information security**, with the ambition of minimising incidents and avoiding administrative sanctions.
- **Systematically improving customer experience** across all touchpoints and service channels.
- **Enhancing communication and user education**, while increasing the accessibility and usability of products and services.
- **Reducing barriers to the use of electric vehicle charging services** and improving user comfort within ORLEN Charge (through the provision of educational materials, training, direct consultations and presence at events).
- **Strengthening positive impacts in e-mobility** by facilitating service use and improving customer experience.
- **Expanding the portfolio of alternative and low-carbon fuels** in response to evolving consumer needs.
- **Developing infrastructure supporting the energy transition**, including the target of building 620 charging points by 2030.

Our progress against these ambitions is monitored using process quality and efficiency indicators, customer satisfaction metrics (including NPS), the volume of complaints and customer issues submitted, as well as through regular management reviews.

# 6.12 Business conduct [ESRS G1]

Table 124 Double materiality assessme

nt summary for business conduct [G1.IRO-1]

| Segment | Area | Geographical region | G1<br>Risk, opportunity, impact | Impact (I)<br>Risk (R)<br>Opportunity (O) | Positive (+)<br>Negative (-) | Actual (A)<br>Potential (P) | Value chain<br>Organisation (O)<br>Downstream (D)<br>Upstream (U) |
|---|---|---|---|---|---|---|---|
| Upstream & Supply, Downstream, Energy, Consumer & Products, Corporate Functions | Refining, Upstream, Energy, Petrochemicals, Gas, Retail, Corporate Functions | Globally | **Corporate culture** | | | | |
| | | | Driving revenue growth by building stakeholder trust through promoting good market practices and setting the standard for ethical conduct | O | | | O, U |
| | | Europe | **Whistleblower protection** | | | | |
| | | | Maintaining a strong reputation through effective prevention of breaches and misconduct | O | | | O, D, U |
| | | | **Political engagement and lobbying activities** | | | | |
| | | | Inadvertent payment of donation to unauthorised entity as a result of identification error | R | | | O, D, U |
| | | | **Supplier relationship management, including payment practices** | | | | |
| | | | Failure to meet due diligence requirements | I | - | P | O, D, U |
| | | Globally | **Cybersecurity and data processing*** | | | | |
| | | | Stakeholder privacy and personal data security; cybersecurity of internal platforms and infrastructure | I | - | P | O, D, U |
| | | | Costs of preventing cyberattacks and remediating their impacts | R | | | O, D, U |

* Additional topic.

| | | short-term | medium-term | long-term |
|---|---|---|---|---|
| Corporate culture | O | ✓ | ✓ | ✓ |
| Whistleblower protection | O | | ✓ | ✓ |
| Political engagement and lobbying activities | O | ✓ | ✓ | ✓ |
| Prevention and detection of corruption, including training | O | ✓ | ✓ | ✓ |
| Risk of cyberattacks* | R | ✓ | ✓ | ✓ |

## 6.12.1 Business conduct policies and corporate culture [G1-1]

We conduct our business in accordance with the principles of ethics and anti-corruption, exercising due diligence and ensuring full compliance with the applicable laws and regulations. Each of the policies outlined below, in the course of its implementation, is consulted with our internal stakeholders, and – in the case of the Whistleblower Protection Policy – also with the trade unions.

In 2025, the following key policies governed business conduct across the ORLEN Group:

ORLEN Group Compliance Policy

The ORLEN Group Compliance Policy for ORLEN (the "Compliance Policy"), effective from 16 April 2019, establishes a comprehensive framework for ensuring the integrity and regulatory alignment of our business operations, including the principles governing lobbying activities. Its overarching objective is to implement and continuously enhance a coherent set of legal and organisational measures ensuring that all business processes across our Group comply with both mandatory legal requirements and voluntarily adopted standards. These commitments are designed to avert legal, financial and reputational consequences that could arise for Group companies, their management and employees in the event of non-compliance.

Regulatory developments are monitored through two structured reporting tools: the ORLEN Ad Hoc Regulatory Report and the ORLEN Periodic Regulatory Report.

The implemented compliance framework reflects our commitment to meeting the expectations of all stakeholders – particularly customers, investors and business partners – and to adhering to recognised best practices applicable to ORLEN as a publicly listed company. This includes standards in corporate governance, regulatory compliance oversight, corporate social responsibility and anti-corruption.

Ultimate responsibility for implementing the Compliance Policy rests with the ORLEN S.A. Management Board.

The Policy has been designed to minimise the risk of non-compliance with applicable legal provisions and decisions issued with respect to ORLEN by competent public authorities. It is accessible to all employees via our repository system for internal policy documents (Dok-System), while subsidiaries implement the Policy based on standards provided by the ORLEN Corporate Governance Framework Office.

ORLEN Group Anti-Corruption and Fraud Prevention Policy (Anti-Corruption Policy)

Our Anti-Corruption and Fraud Prevention Policy establishes a robust framework to promote integrity, transparency and accountability in business conduct. Its objective is to foster trust, safeguard the integrity of economic transactions, support fair competition and create value for all our stakeholders. Aligned with the United Nations Convention against Corruption, the Policy complements the ORLEN Group Code of Ethics, particularly in strengthening awareness and defining clear standards of conduct aimed at preventing corruption and fraud. Subject to relevant requirements of the local laws, the Policy applies to all employees of the ORLEN Group – regardless of the form of employment and job position – and to other stakeholders, mainly third parties acting on behalf of the Group companies.

Responsibility for the implementation and application of the Policy rests with the ORLEN S.A. Management Board, while operational oversight is exercised by the relevant Directors.

The Anti-Corruption and Fraud Prevention Policy is communicated to our internal stakeholders via the corporate intranet, its key principles further reinforced through mandatory anti-corruption training. Extracts from the relevant policy documents are also shared via our websites with external stakeholders and with business partners during procurement processes, and are embedded in contractual relationships through anti-corruption clauses. Employees in positions identified as carrying the highest corruption risk are covered by dedicated mandatory training delivered on a biennial basis. These positions are listed in the ORLEN Group Conflict of Interest Management Policy with respect to persons covered by a conflict-of-interest assessment.

In addition, all employees across the Group are required to complete mandatory anti-corruption training. Within the Control and Security Area, designated employees receive training in the handling of whistleblowing reports and the protection of whistleblowers.

ORLEN Group Conflict of Interest Management Policy

Our Conflict of Interest Management Policy has been established to ensure the integrity and transparency of business conduct across the Group. It supports compliance with generally applicable laws, the ORLEN Group's ethical standards and internal regulations, while also serving as a key mechanism for preventing corruption and fraud.

The Policy applies to employees holding positions identified as carrying the highest corruption risk, as well as those whose roles involve decision-making authority or influence over the selection of business partners. It also covers members of the Management Boards and Supervisory Boards of ORLEN S.A. and other Group companies.

Its primary objective is to enable the identification, disclosure and effective management of both actual and potential conflicts of interest.

In particular, the Policy requires individuals in roles subject to a conflict-of-interest assessment – as well as third parties acting on behalf of ORLEN Group companies – to submit formal declarations prior to commencing their professional duties and, where relevant, throughout the course of their employment, engagement or appointment. These declarations are intended to ensure transparency and facilitate the timely identification of potential conflicts. The Policy further defines the responsibilities and accountability of individuals subject to a conflict-of-interest assessment, as well as those of third-party representatives.

Responsibility for the implementation and application of the Policy rests with the ORLEN S.A. Management Board, while operational oversight is exercised by the relevant Directors.

ORLEN Group Whistleblower Protection Policy

The ORLEN Group Whistleblower Protection Policy is grounded in applicable legislation, in particular the Polish Act on the Protection of Whistleblowers of 14 June 2024 (Dz.U. of 2024, item 928), which constitutes the transposition of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law (OJ L 305, 26.11.2019). The purpose of the Policy is to ensure consistent standards across our Group companies for the protection of individuals reporting breaches of law, internal regulations, or ethical standards. Responsibility for the implementation and application of the Policy lies with the Head of the ORLEN S.A. Economic Security Office.

The Policy has been implemented across the majority of ORLEN Group companies, with individual entities establishing their own whistleblowing channels. Exceptions apply in the absence of a relevant legal obligation – for example due to company size or jurisdictional scope. In such cases, alternative mechanisms for reporting breaches of law, including anonymous reporting systems, are made available by the respective companies.

At ORLEN S.A., reports submitted under the Whistleblower Protection Policy are handled in accordance with our internal regulations, including the ORLEN S.A. Internal Whistleblowing Rules and associated operational guidelines within the Control and Security Area.

Information on the available reporting channels is provided to employees of ORLEN S.A. and other Group companies via our corporate intranet, and to external stakeholders via the ORLEN S.A. website. In addition, business partners participating in our procurement processes are advised of the applicable regulations, with procedures for reporting legal breaches additionally incorporated into contractual arrangements through mandatory anti-corruption clauses.

From the moment a report is submitted or publicly disclosed, whistleblowers are afforded protection against any form of retaliation, including refusal or termination of employment, discrimination, bullying or pay reduction. A strict prohibition of retaliatory actions against whistleblowers, whether actual, attempted or threatened, is enforced across the Group, with violations subject to disciplinary measures. This protection extends equally to individuals supporting whistleblowers and those associated with them.

At the ORLEN Group, we have implemented robust technical and organisational safeguards to ensure the confidentiality of whistleblowing reports and the protection of personal data, as a result of which whistleblower identities are not disclosed.

Reporting channels include dedicated drop boxes, confidential helplines, email addresses and written correspondence addressed to designated unit heads. Employees are provided with the opportunity to seek guidance from and report concerns directly to the head of the dedicated organisational unit. Furthermore, all contracts concluded by ORLEN Group companies include a mandatory anti-corruption clause, which provides information on a designated email address through which reports of legal breaches may be submitted. Reports may be submitted confidentially and anonymously, thereby enhancing both individual protection and organisational security. In line with our internal procedures, the receipt and investigation of reports – as well as any follow-up actions – are carried out by organisational units independent of the management structures involved in the reported matters.

We ensure that employees are adequately informed and trained on whistleblowing procedures. Our Internal Whistleblowing Rules are widely accessible via the corporate intranet, as are details on the designation and training of personnel responsible for handling such reports.

ORLEN Group Policy for Accepting and Offering Gifts (Gift Policy)

The ORLEN Group Gift Policy has been established to ensure transparency in our business relationships and compliance with generally applicable laws, internal regulations, and with voluntarily adopted ethical and anti-corruption standards across the ORLEN Group. It is also intended to define the responsibilities, rules of conduct and communication procedures related to the reporting and registration of gifts. The Policy sets out standards governing the giving and receiving of gifts within the ORLEN Group, including clear principles for their registration. It categorises gifts into those that are permitted and those that are prohibited, and establishes general guidelines governing any exchange of gifts in our business relationships.

Responsibility for the implementation and application of the Policy rests with the ORLEN S.A. Management Board, while operational oversight is exercised by the relevant Directors.

Ethics, values, and respect for human rights are core elements of our organisational culture and corporate strategy. To define and communicate our stance on key ethical issues, human rights protection, and the prevention of workplace bullying, discrimination and harassment, we have implemented a number of measures, procedures and documents, which we have also progressively rolled out across ORLEN Group companies.

The principal document governing compliance with standards and principles within the ORLEN Group is our ORLEN Group Code of Ethics, described below. We developed this Code at ORLEN S.A., and we have been progressively implementing it across ORLEN Group companies since 2022.

Figure 19 ORLEN Group Values




ORLEN Group Code of Ethics

Our Code of Ethics sets out clear, practical and up-to-date guidelines defining standards of conduct applicable to all employees, in alignment with the Group's core values.

The Code also articulates our position on the ethical principles and standards governing the Group's activities, as well as their current scale and strategic direction, expectations towards our business partners, and best practices in business ethics. As at the end of 2025, the Code of Ethics was in place at 85% of ORLEN Group companies, with rollout to further companies planned for 2026.

Our Group maintains core policies and functions designed to support responsible business conduct. These include the ORLEN Group Human Rights Policy ("Human Rights Policy"), the Whistleblower Protection Policy, the ORLEN Diversity Policy, and the Ethics Officer function, all of which are described in disclosure S1. As at the end of 2025, the Human Rights Policy was a binding document in 89% of ORLEN Group companies, with further deployments planned for 2026.

Model for reporting and analysing enquiries, concerns and violations with respect to the ORLEN Group's core values and standards.

The model also applies to external stakeholders and can be accessed via our corporate website.

To ensure compliance with ethical principles and the protection of human rights, we have implemented and maintain mechanisms for reporting enquiries, concerns and violations. The reporting procedures provide multiple voluntary channels for disclosing irregularities that have led, or may lead, to violations concerning ethics, human rights, employee relations or personal rights within the ORLEN Group. Our organisation guarantees confidentiality and security for individuals who report or disclose information on violations, while also committing itself to an effective and thorough remedial process and the implementation of corrective measures.

The ORLEN Group Code of Ethics, the ORLEN S.A. Workplace Bullying, Discrimination and Harassment Prevention Rules, and the Human Rights Policy set out mechanisms for identifying, reporting, and investigating concerns related to unlawful conduct or behaviours inconsistent with our values. In addition to the Code of Ethics, we have established the role of Ethics Officer as well as an Employee Relations Committee.

Furthermore, to maintain the highest standards, we are committed to exercising appropriate due diligence with respect to human rights throughout our business activities and relationships, including in the planning and execution of new investment projects. In 2025, no reports concerning human rights violations were recorded within the ORLEN Group.

## Figure 20 Model for reporting and analysing enquiries, concerns and violations with respect to the ORLEN Group's core values and standards

### Report an enquiry, concern or violation with respect to the ORLEN Group's core values and standards

**Option 1**

If you wish to report an enquiry, concern, or violation with respect to the ORLEN Group's core values or standards, your first step is to contact your line manager.

**Option 2**

If there are compelling reasons that prevent you from approaching your line manager, contact the Ethics Officer.

Email
rzecznik_etyki@orlen.pl

Telephone
(+48) 607 197 531

Postal mail
ORLEN S.A.
Ethics Officer (Rzecznik ds. Etyki) ul.Chemików 7
09-411 Płock, Poland

**Option 3**

If there are compelling reasons that prevent you from approaching your line manager or the Ethics Officer, contact the Executive Director for HR.

Email
KKL@orlen.pl

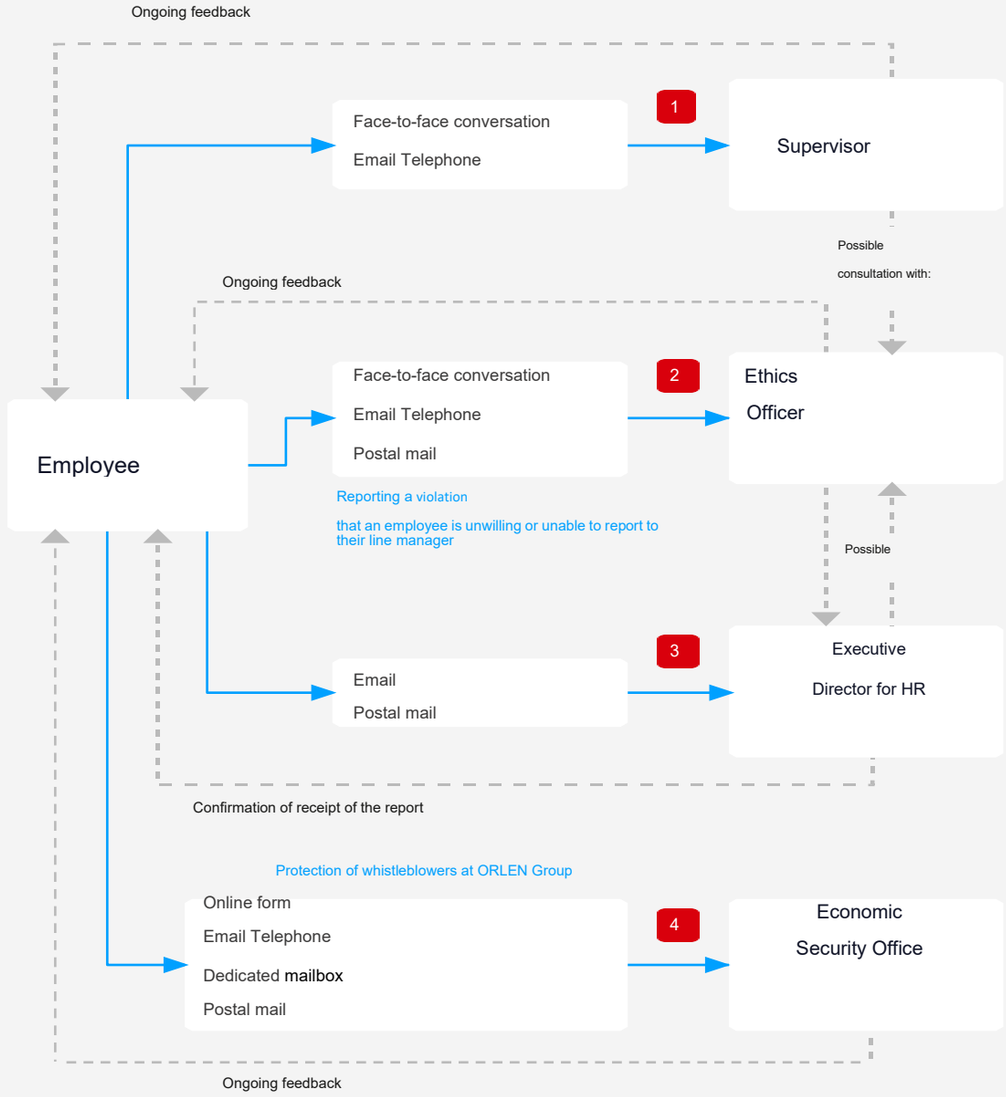
Telephone
+48 (24) 256 90 99

Postal mail
ORLEN S.A.
Executive Director for HR (Dyrektor Wykonawczy ds. HR)
ul. Bielańska 12, Warsaw 09-411 Płock, Poland

**Option 4**

You can also submit a report (including a anonymous one) directly to the Economic Security Office, using the dedicated whistleblowing channel as provided for in the ORLEN Group Whistleblower Protection Policy.

Model for reporting and analysing enquiries, concerns and violations with respect to the ORLEN Group's core values and standards



### Training and educational initiatives within the ORLEN Group conducted as part of the established policies and procedures governing ethics, human rights, diversity, and the prevention of workplace bullying, discrimination, and all forms of harassment

We carry out these initiatives at ORLEN S.A. and other Group companies in line with our established policies and procedures addressing ethics, human rights, diversity, and the prevention of workplace bullying, discrimination, and all forms of harassment. These include employee training sessions, workshops, educational briefings, competitions and awareness-raising events, mandatory training, communication campaigns, and cooperation with various business areas to promote best practices in these fields. Collectively, these initiatives play a significant role in shaping our organisational culture and fostering an environment of trust and security among our employees, particularly those from minority groups who may be at greater risk of unequal treatment or discrimination.

In 2025, we carried out the following employee training sessions and educational initiatives:

- mandatory e-learning on the ORLEN Group Code of Ethics, completed by 81% of ORLEN S.A. employees (with a requirement for all employees to complete the training at least once every three years);
- mandatory training on the ORLEN Group Code of Ethics, attended by a total of 68% of ORLEN Group employees (with a requirement for all employees to complete the training at least once every three years);
- mandatory e-learning on the Human Rights Policy, completed by 95% of ORLEN S.A. employees (with a requirement for all employees to complete the training at least once every three years);
- training on the Human Rights Policy, attended by 71% of ORLEN Group employees (with a requirement for all employees to complete the training at least once every three years);
- mandatory training on workplace bullying prevention – completed by 82% of ORLEN S.A. employees (with a requirement for all employees to complete the training at least once every three years);
- additional recurring training dedicated to workplace bullying prevention for ORLEN S.A. management staff;
- 'Introduction to AI' training sessions, including a module on ethics, attended by 1,262 participants.

In addition, a series of preventive sessions was launched to reduce the risk of inappropriate behaviours among ORLEN S.A. employees. The initiative will be continued in subsequent years. Throughout 2025, we also organised a range of educational events at ORLEN S.A., including the Ethics Days, Diversity Festival, and webinars aimed at increasing awareness of psychological safety, inclusive communication and neurodiversity.

### The Diversity Charter and the Charter on the Rights of Children in Business

On 14 December 2023, ORLEN S.A. became a signatory to the Diversity Charter – a European Commission-supported initiative promoting equality and diversity management in the workplace. It is implemented in 26 European Union countries, with the programme in Poland coordinated by the Responsible Business Forum.

The Charter is a written commitment signed by an organisation obliging it to prohibit workplace discrimination. By adopting the Diversity Charter, we explicitly demonstrate our commitment to actively fostering diversity and engaging our entire workforce, along with our business and social partners, in these efforts. Following its adoption, in 2024 we initiated strategic planning to fulfil our commitments, foster diversity, and further enhance our organisational culture. These plans will be executed over the coming years.

On 24 January 2024, we became a signatory to the Charter on the Rights of Children in Business, a new initiative in Poland developed by the Responsible Business Forum in collaboration with businesses and social organisations. By endorsing the Charter, we have committed to respecting children's rights throughout all aspects of our corporate activities. Among other objectives, we aim to create a supportive and inclusive workplace for parents, assist our employees in balancing their parental and professional responsibilities, and promote responsible employment practices. In connection with this commitment, ORLEN has implemented initiatives focused on children's rights in business, primarily directed at employees in their roles as parents and caregivers.

## 6.12.2 Management of relationships with suppliers [G1-2]

In performing its tasks, the ORLEN Group's Procurement Area operates in accordance with a comprehensive framework of internal regulations, including the Procurement Policy, Procurement Guidelines, Supplier Evaluation Guidelines and Strategic Category Management Guidelines. A key pillar of our procurement processes is to build and maintain stakeholder trust. Accordingly, suppliers are required to operate in compliance with applicable laws and the highest ethical standards.

All suppliers seeking to participate in our procurement procedures are required to review and formally accept the relevant policies and regulations. This is a mandatory criterion, verified at the initial stage of each procurement process as part of the supplier's formal eligibility assessment. Supplier evaluation is conducted in accordance with criteria defined in the applicable Code.

In addition, our contracts with suppliers include clauses addressing a range of issues, such as environmental protection, occupational health and safety, sanctions compliance, anti-corruption and beneficial ownership disclosures.

We place great importance on stakeholder trust. Accordingly, we require our suppliers to operate in line with the values, ethical standards, and legal requirements set out in the ORLEN Group Code of Conduct for Suppliers.

We require all suppliers participating in our procurement processes to familiarise themselves with and accept the ORLEN Group Code of Conduct for Suppliers, the Human Rights Policy, and our anti-corruption regulations. These represent formal criteria applied in the procurement processes. The criteria detailed in the Code address key environmental, social, and corporate governance (ESG) considerations. Our suppliers are evaluated based on these criteria.

### 6.12.3 Payment practices [G1-6]

We have established internal policies governing payment practices at ORLEN Group companies, including standard payment terms aligned with market norms relevant to each of our business segments. To ensure the timely settlement of liabilities, general policies have also been implemented to govern our accounts payable process, supported by detailed operational procedures and guidelines.

There is no standard payment term across the ORLEN Group. In 2025, standard payment terms across the ORLEN Group ranged from **7 to 90 days.** This variation reflects the scale and diversity of the Group's operations, as part of which it works with suppliers across multiple countries, sectors and industries. Payment terms are also influenced by the legal and regulatory environments of individual markets. They are determined on a case-by-case basis, taking into account the nature of the goods and services provided, as well as the specific requirements and contractual arrangements.

The information presented below on payment practices at the ORLEN Group, calculated as the weighted average of payments meeting the standard in a representative sample of four companies, covering approximately 78% of total payments across the Group.

Table 125 Percentage of payments aligned with standard payment terms at representative Group companies

| | Number of the undertaking's payments | Number of payments aligned with standard payment terms | Percentage of payments aligned with standard payment terms | Average time the undertaking takes to pay an invoice from the date when the contractual or statutory term of payment starts to be calculated |
|---|---|---|---|---|
| ORLEN Group | 2,428,522 | 1,482,828 | 61.06% | 30.87 |

There is no data regarding payment practices for the ORLEN Group for 2024.

In 2025, the ORLEN Group was involved in 36 court proceedings related to late payments.

With regard to payment practices, we do not differentiate between small and medium-sized enterprises (SMEs) and other suppliers. Information on payment terms and the settlement of liabilities is therefore presented on an aggregated basis for all suppliers.

### 6.12.4 Prevention and detection of corruption and bribery [G1-3]

We structure our anti-corruption process at the ORLEN Group as a cycle of interconnected activities comprising four stages: prevention, identification, verification or investigation, and calibration. Establishing anti-corruption awareness is a fundamental component of this framework. This awareness underpins the identification of misconduct, which occurs via two principal channels: stakeholder reports submitted through whistleblowing or other grievance mechanisms, and system-generated alerts from our corporate applications. Following initial assessment, identified cases are directed either to verification or to formal investigation as part of follow-up actions.

Investigative processes aim not only to confirm or exclude instances of misconduct, but also to identify patterns and methods (modus operandi) associated with corruption and fraud. These insights are subsequently integrated into our systemic controls through calibration of the corporate applications. The Anti-Corruption Policy is designed both to prevent incidents and to mitigate their potential negative impacts. Contractors and participants in our procurement processes are required to declare the absence of any conflicts of interest and affiliations with other contractors involved that could compromise the integrity of the procurement procedure. The inclusion of anti-corruption clauses in contracts facilitates ongoing monitoring of contractors, enabling potential corruption incidents to be promptly detected and addressed. The application of anti-corruption clauses is recommended across the entire ORLEN Group.

The ORLEN Group Whistleblower Protection Policy and internal reporting regulations ensure the independent investigation of reports and appropriate follow-up actions. Where reports involve the activities of our Management Board at ORLEN S.A. or the Management Board of another ORLEN Group company, follow-up actions are carried out under the supervision of the respective Supervisory Board.

The Rules of Procedure for the Supervisory Board set out the responsibilities of the Security Committee, which include receiving reports on the implementation of the ORLEN Group Anti-Corruption and Fraud Prevention Policy. Our Group companies maintain internal regulations that govern reporting to administrative, management, and supervisory bodies, and report annually to ORLEN S.A. regarding their implementation of the Anti-Corruption Policy.

The ORLEN Group Conflict of Interest Management Policy defines a list of positions subject to a conflict-of-interest assessment, which also correspond to roles with the highest corruption risk. Individuals occupying such positions are required to disclose any relationships that may give rise to conflicts of interest, enabling appropriate oversight and management by their superiors.

We provide mandatory anti-corruption training to all Group employees. Within the Control and Security Area, designated employees receive training in the handling of whistleblowing reports and the protection of whistleblowers.

Communication of the policy on preventing, detecting, and responding to corruption and bribery incidents

Our Group companies communicate the ORLEN Group Anti-Corruption and Fraud Prevention Policy in line with their internal procedures. The Policy's key principles are communicated primarily through mandatory anti-corruption training sessions.

To ensure appropriate stakeholder awareness, these core principles are also published via internal media and on the websites of ORLEN Group companies.

Nature and scope of anti-corruption and bribery training programmes

Training guidelines are issued by the ORLEN S.A. Control and Security Area. Internal training programmes are conducted based on requirements identified as part of the preparation of an annual training plan. Mandatory anti-corruption training covers all our employees, while extended training programmes are also provided to management and individuals in positions with the highest corruption risk. In the reporting year, 64.20% of employees in such high-risk roles participated in dedicated training across the ORLEN Group. We also provide training on our Whistleblower Protection Policy. Members of the Management Board and Supervisory Board are likewise covered by anti-corruption training programmes.

The training content includes the key regulatory components of our anti-corruption framework:

- ORLEN Group Anti-Corruption and Fraud Prevention Policy,
- ORLEN Group Whistleblower Protection Policy,
- ORLEN Group Conflict of Interest Management Policy,
- ORLEN Group Policy for Accepting and Offering Gifts.

For members of the governing and supervisory bodies at ORLEN S.A., training is further supplemented with elements of the Rules of Procedure for the Management Board and the Remuneration Policy for Members of the Management Board and Supervisory Board, as adopted by the General Meeting.

### 6.12.5 Incidents of corruption or bribery [G1-4]

To address potential violations, we operate a comprehensive anti-corruption framework based on the policies outlined in disclosure G1-1. In addition, to strengthen awareness of anti-corruption and fraud prevention, our employees are required to complete mandatory, recurring training programmes. Relevant policies are also made publicly available to our external stakeholders via the ORLEN website.

During the reporting period, no convictions were recorded for violation of anti-corruption and anti-bribery laws.

### 6.12.6 Political influence and lobbying activities [G1-5]

Our representatives engage in consultations regarding proposed measures at both national and EU levels, either directly or through industry associations. Positions developed by ORLEN experts are publicly available under Our positions.

In line with our Compliance Policy, the Executive Director for Regulatory Affairs and Compliance oversees lobbying activities conducted by ORLEN S.A. and supervises such activities within the ORLEN Group.

Pursuant to Section 3.5.4 and 3.5.5 of the ORLEN Charitable Policy, the provision of direct support for political purposes is strictly prohibited. We do not review requests for donations from trade unions, professional self-governments, employer organisations, commercial-law companies other than those specified in Section 3.4.6 (i.e. entities established by public finance sector units), political parties, or foundations and associations established by political parties.

In 2025, no donations to political parties, politicians, or institutions of a similar nature were identified.

At the Group level, a related framework – Organisational Standard for Delivery of the Charitable Policy by Companies of the ORLEN Group – is in place, under which all entities conduct their charitable activities in accordance with the ORLEN Charitable Policy, as described in disclosure S3.

ORLEN Group entities operate across the oil and gas, energy generation and energy services, chemicals and biofuels sectors. Within these areas, our Group maintains an ongoing and transparent dialogue with a range of external stakeholders, including governmental authorities, European Union institutions, and other third parties. We are an active member of industry organisations and associations engaged in public policy advocacy on climate change and other areas, aiming to shape a comprehensive policy and regulatory framework relevant to ORLEN's operations. Key organisations include: $CO_2$Value Europe, Hydrogen Europe, the European Fuels Manufacturers Association, the International Association of Oil and Gas Producers, the European Chemical Industry Council (CEFIC), the European Fuels Manufacturers Association, the Polish New Mobility Association, POPiHN – the Polish Oil Industry and Trade Organisation, and the Polish Chamber of Chemical Industry. Our representatives participate in these organisations as subject-matter experts, contributing to consultations and providing input on proposed regulatory solutions.

In the EU transparency register, ORLEN is registered under number 105450620110-21.

**Key topics addressed through lobbying activities and ORLEN's principal positions in this regard are presented below.**

Polish regulations

**Draft Act Amending the Aviation Law and Certain Other Acts**

We advocated, among other things, for a revision of the definition of an 'aviation fuel supplier' and the introduction of a mechanism allowing specific batches of sustainable aviation fuel (SAF) to be credited towards the National Indicative Target (NIT). We also emphasised the need to establish clear rules for documenting compliance with the SAF blending obligations and to clarify provisions concerning penalties for non-compliance.

**Draft Act Amending the Act on Preventing Pollution from Ships and Certain Other Acts**

Our involvement was limited to submitting comments mainly in relation to: changes in the legislative drafting techniques for incorporating certain definitions from the FuelEU Maritime Regulation, removal of the requirement to hold a copy of the written registration confirmation, and clarification of interpretative uncertainties regarding the application of FuelEU Maritime obligations to vessels moored at the quay in the port of call.

**Draft Regulation on the minimum share of biocomponents in liquid fuels used in all modes of transport**

We advocated for maintaining the existing mandatory blending level at 5.2%, noting that provisions of the Biocomponents and Liquid Biofuels Act exclude the recognition of biofuel components obtained through the HVO process and those derived from feedstocks listed in Annex 1 to the Act.

**Draft Regulation of the Minister of Industry and the Minister of Climate and Environment on quality requirements for liquefied natural gas (LNG)**

We highlighted that while the regulation constituted a vital element of the fuel quality monitoring and control system and its prompt adoption was both justified and necessary, its effectiveness depended on the adoption of two accompanying regulations governing LNG sampling methods and testing procedures, which would complete this framework enabling practical evaluation of LNG quality by the Trade Inspection Authority.

**Draft Act amending the Act on Reserves of Crude Oil, Petroleum Products, and Natural Gas and on Measures to Address Threats to the State's Fuel Security and Disruptions in the Oil Market and Certain Other Acts**

We supported the proposed partial transfer of the obligation to maintain physical stocks of crude oil and refined products from producers and traders to the Government Strategic Reserves Agency (RARS), as the proposed changes would not only reduce company costs but would also alleviate industry demand for private storage capacity. Moreover, the reform is expected to positively impact the storage market by reducing storage costs, improving control over reserves, and enabling more efficient allocation of stocks according to demand.

**Draft Act Amending the Act on Taxation of the Extraction of Certain Minerals**

We proposed extending the tax reform to cover natural gas and crude oil extraction, which would support the strategic role of domestic gas and oil production in ensuring supply security, price stability, and Poland's energy transition.

**Draft Regulation of the Minister of Energy amending the Regulation on the detailed list of liquid fuels whose production, storage or handling, transmission or distribution, or trade, including foreign trade, requires a licence and whose import requires entry in the register of importing entities**

We advocated for extending the scope of the amendment to address the main issue currently affecting the Polish LPG fuel market, namely that of increased imports of n-butane (CN code 2901 10 00) from Russia, used so far in the cosmetic industry or laboratory applications, and currently as a substitute for LPG subject to EU sanctions.

**Draft Act Amending the Act on Monitoring and Control of Fuel Quality and the Act on the National Revenue Administration**

We proposed expanding the statutory definition of 'heavy fuel oils' to include products classified under CN code 2707 (subheadings CN 2707 99 19, 2707 99 91 and 2707 99 99), which are currently omitted from the draft legislation.

**Draft Act Amending the Assay Law and the Law on Measures**

We proposed introducing provisions to supplement the existing Act of 11 May 2001 – Law on Measures by enabling 'assisted verification' by metrology authorities at the user's request to confirm that serviced measuring instruments remain compliant and can be used without requiring re-certification.

**Draft Act Amending the Act on the Monitoring System for the Carriage of Goods by Road and Rail and on Fuel Oil Trading, and Certain Other Acts**

We submitted proposals to maintain exemptions from the obligation to report intra-warehouse transfers of goods to the road and rail transport and trade monitoring system (SENT), as well as to exclude from SENT goods moved within the territory of Poland under the e-DD document. Furthermore, we proposed extending the monitoring system to cover the transport of fertilisers, amending the rules governing the deadline for closing SENT notifications, and clarifying the scope of data required to be provided in this process.

**Draft Act Amending the Act on the GHG Emission Allowance Trading System and Certain Other Acts (ETS1)**

We advocated for extending the application of a zero emission factor beyond biofuels, bioliquids and biomass fuels to include RFNBOs, recycled carbon fuels (RCF), low-carbon synthetic fuels, and blended fractions, subject to demonstrated compliance with relevant sustainability criteria and – depending on the sector – with greenhouse gas reduction criteria.

**Draft Act Amending the Energy Efficiency Act and Certain Other Acts**

We focused on issues related to the alternative compliance fee and the functioning of the white certificates market, proposing removal of the requirement to place purchase orders for white certificates in all trading sessions as a condition for being allowed to pay the fee.

**Draft Act Amending the Capacity Market Act**

Our position submitted to the government included proposals aimed at facilitating investor participation in capacity auctions and enabling the contracting of stable generation capacity.

**Draft Act Amending the Energy Law and Certain Other Acts**

Our position submitted to the government, both directly and through industry associations, supported the proposed amendments, particularly in view of the planned commissioning of new generation assets.

**Draft Act Amending the Energy Law and Certain Other Acts**

Our position, submitted directly or through industry associations, included comments on expanding the list of exemptions from mandatory trading obligations.

**Draft Act Amending the Act on the GHG Emission Allowance Trading System and Certain Other Acts**

We proposed provisions that would allow budget revenues from the sale of $CO_2$ emission allowances by Poland to be allocated to investments in nuclear energy, including small modular reactors (SMRs), as part of climate-related expenditure.

**Draft Act Amending the Act on the Promotion of Electricity Generation in Offshore Wind Farms and Certain Other Acts**

We provided comments aimed at increasing the likelihood of conducting an offshore wind auction in December 2025 and improving the economic viability of offshore wind projects.

**Draft Act on Artificial Intelligence Systems**

We highlighted the need to introduce minimum environmental standards for newly built data centres based on recognised international benchmarks, incentives (e.g. state aid) for new investment projects, and the development of energy-efficient data centre locations.

**Draft Act Amending the Act on the Education in Sobriety and Alcoholism Prevention**

We emphasised the need for measures to reduce alcohol consumption within society, while noting that both the statutory regulations proposed by the government and those sponsored by MPs target only selected sales channels and may therefore prove to be ineffective. We advocated for comprehensive, horizontal regulation applicable to all market participants.

**Draft Act Amending the Act on the National Labour Inspectorate and Certain Other Acts**

We pointed to risks associated with the proposed immediate enforceability of labour inspector decisions and the need to clarify criteria determining the actual existence of an employment relationship. Work on the draft legislation has been suspended.

**Draft Act Amending the Land Surveying and Cartography Law and the Spatial Information Infrastructure Act**

Our comments related to proposed legislative solutions concerning closed areas.

**Act of 3 February 1995 on the Protection of Agricultural and Forest Land and the Construction Law of 7 July 1994**

We advocated for administrative simplifications for hydrocarbon extraction activities.

**Act of 9 January 2025 on Special Solutions for Counteracting Support for Aggression against Ukraine and Protecting National Security, the Act on National Revenue Administration, and the Act on the Prevention of Money Laundering and Terrorist Financing**

We submitted comments highlighting the need for clarification of certain aspects, including the scope of required declarations, risk determination, and implications for third countries.

EU regulations

In 2025, our key regulatory positions at the EU level, in the context of ongoing legislative processes, concerned the following key regulations:

**Regulation (EU) 2023/1115 of 31 May 2023 on the making available on the Union market and export from the Union of certain commodities and products associated with deforestation and forest degradation**

We advocated for a simplification of administrative obligations and deferred application of the regulation's provisions.

**Amendment to the European Climate Law and the proposed 2040 climate target**

We argued that the proposed target of a 90% reduction in emissions by 2040 compared with 1990 levels exceeds the realistic technological, financial and political capabilities, and therefore should be set at a lower level. We also called for greater flexibility in supporting mechanisms, including the use of international carbon credits and application of the technological neutrality principle.

**Revision of the EU Emissions Trading System**

We advocated for maintaining the international competitiveness of industrial installations covered by the EU ETS through mechanisms ensuring a level playing field for EU and non-EU entities. This would involve increasing the volume of free allowances allocated to sectors exposed to carbon leakage, providing compensation for indirect costs, improving market liquidity through adjustments to the Linear Reduction Factor (LRF), and revising the Market Stability Reserve (MSR) to prevent depletion of allowances in 2039/2040. We also called for delaying the implementation of the system until alternative solutions in the transport and heating sectors are sufficiently developed, which could help mitigate the cost impact of ETS2.

**Regulation on phasing out Russian natural gas imports and preparing the phase-out of Russian oil imports, improving monitoring of potential energy dependencies and amending Regulation (EU) 2017/1938**

We advocated for shortening transitional periods, limiting the scope of the suspension clause, which could potentially undermine the overall effectiveness of the regulation, tightening controls over gas flows to prevent the transmission of Russian gas disguised as originating from other sources, introducing financial penalties to ensure a deterrent effect, and restricting permissible amendments to existing contracts.

**Proposal to amend Directives 2006/43, 2013/34, 2022/2464 (CSRD) and 2024/1760 (CSDDD) with regard to certain sustainability reporting and due diligence requirements**

We primarily advocated for complete removal of Article 22 of the CSDDD Directive and related provisions, as it would require both EU and non-EU undertakings to prepare and implement climate transition plans. In our view, retaining that requirement could negatively affect partnerships with non-European oil and gas companies, potentially leading to disruption of market stability, increased commodity prices, and reduced energy security in the EU.

**Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EU) 2019/631 as regards $CO_2$ emission standards for new light commercial vehicles and vehicle labelling, and repealing Directive 1999/94/EC**

In the context of the proposal on $CO_2$ emission standards, we advocated, among other things, for increasing the role of e-fuels and biofuels in contributing to compliance with $CO_2$ emission targets, as well as for expanding the range of fuels meeting the relevant criteria, including recognition of the role of first-generation biofuels. In our view, this would, in particular, support the security of fuel supply chains, improve the availability and enable the use of locally sourced (i.e. European) inputs for biofuel production.

**Proposal for the Multiannual Financial Framework for 2028–2034, together with the proposal for a Regulation of the European Parliament and of the Council establishing the European Competitiveness Fund**

We believe the mechanism for allocating funding from the European Competitiveness Fund, particularly that dedicated to the energy transition, should reflect the scale of challenges faced by individual Member States and regions. For this reason, it is essential to establish national and/or regional allocation envelopes.

**Regulation (EU) 2025/1227 of the European Parliament and of the Council on the modification of customs duties applicable to imports of certain goods originating in or exported from the Russian Federation and the Republic of Belarus**

Our key proposals included the immediate application of tariffs and the introduction of official monitoring of fertiliser imports, increasing ad valorem duty rates while simultaneously reducing the quotas required to trigger such rates, and extending trade measures to additional fertiliser products not covered by the European Commission's proposal.

**Draft Commission Implementing Decision laying down rules for the application of Directive (EU) 2019/904 as regards the calculation, verification and reporting of data on recycled plastic content in single-use plastic beverage bottles**

We advocated, among other things, for expanding the range of substances recognised as recycled material to include all non-fuel products. In our view, this would enable manufacturers to declare recycled content in high-value products, rather than limiting such reporting to polymers only.

**Communication from the European Commission amending the Guidelines on certain state aid measures in the context of the greenhouse gas emission allowance trading system post-2021**

We proposed extending the list of entities eligible for compensation of indirect costs and removing the rule proposed by the Commission under which sectors covered by CBAM, including the fertiliser sector, would be excluded from compensation mechanisms.

**Environmental Omnibus package**

We advocated for reducing the administrative burden associated with monitoring and reporting the environmental impact of installations, and for streamlining and accelerating the environmental permitting process for their operators.

**Delegated act on grouped packaging and plastic straps supplementing Regulation (EU) 2025/40 on packaging and packaging waste (PPWR)**

The position we presented emphasised the need to fully exclude pallet wrappings and straps from the reuse targets set out in Article 29(1), (2) and (3) for technical, operational, economic and environmental reasons.

**Revision of the Block Exemption Regulation**

We advocated for raising the aid intensity thresholds in respect of eligible project costs in areas such as heating sector decarbonisation, carbon capture and storage (CCS), and the promotion of renewable energy. We also called for extending eligibility to projects across the entire $CO_2$ value chain, including low-carbon hydrogen.

**Draft Communication from the European Commission establishing a framework for state aid measures to support the Clean Industrial Deal**

Through industry associations, we participated in the public consultation on the draft document, submitting comments on the need to incorporate criteria for the European Commission's notification of state aid related to capacity mechanisms, taking into account the specific characteristics of the Polish energy market.

**Draft Commission Implementing Regulation (EU) specifying the pre-qualification and award criteria for auctions for the deployment of energy from renewable sources**

We submitted comments highlighting the need to recognise contributions to sustainability through the ownership – or demonstrated plans to develop – complementary generation assets by bidders, while also proposing clarifications to the wording of specific provisions.

Certain members of the ORLEN Supervisory Board simultaneously hold positions as Director General at the Ministry of State Assets and Deputy Director for Implementation of the Province of Warsaw's Budget at the Marshal's Office of the Province of Warsaw, within the Budget and Finance Department.

In addition, one Supervisory Board member, at the time of nomination, was employed as a Legal Advisor at the supreme state audit authority. Additionally, he was acting Deputy Director of the Legal and Audit Decisions Department at Poland's Supreme Audit Office.

### 6.12.7 Additional entity-specific topic

## Cybersecurity at ORLEN S.A. and the ORLEN Group in 2025

Our key document governing cybersecurity is the ORLEN Group ICT Security Policy, established to define the rules and requirements necessary to maintain the desired level of cybersecurity across the ORLEN Group. The document sets out the standards for cybersecurity management, introducing both general cybersecurity rules and detailed requirements and responsibilities relating to IT and OT assets.

Oversight of compliance with the Policy rests with Head of the Control and Security Office and Executive Director for IT, in line with their respective areas of responsibility. The Policy is distributed through an internal IT platform that enables users to confirm that they have read and understood the document. All ORLEN S.A. employees with access to ORLEN S.A.'s information and communications assets were required to complete an e-learning course covering the requirements and obligations assigned to them under the Policy. At the same time, all users of ORLEN S.A.'s information and communications assets were required to comply with the Policy.

Cybersecurity measures are designed to maintain the target level of cybersecurity. This is achieved not only by ensuring compliance with external legal requirements, but also through proactive threat identification, ongoing analysis, and responsive action to prevent and mitigate threats.

ORLEN SA. delivers cybersecurity services both internally and to other Group companies under a centralised operating model, based on an integrated approach combining regulatory requirements, technical solutions, processes and people. At the operational level, specialised roles and structures are in place, including CERT ORLEN S.A., responsible for incident response coordination, monitoring, and operational support for Group entities. Our cybersecurity efforts extend beyond defence and incident response, with a strong emphasis on proactive measures aimed at identifying threats and strengthening resilience before any incidents occur.

We coordinate cybersecurity activities in a manner that supports the delivery of business objectives, while ensuring resilience and continuity of our critical processes and services. This is achieved in particular through the analysis and mitigation of cybersecurity risks and the safeguarding of IT/OT system continuity. These activities include the continuous identification of threats, risks and incidents, their management, and systematic enhancement of protective, organisational and technical measures in place, supported by ongoing evaluation of security controls, readiness exercises, and organisational lessons learned.

**Selected cybersecurity initiatives**

In 2025, ORLEN S.A. initiated a process to expand its cybersecurity structures. A key initiative delivered by our Cybersecurity Office was the first edition of CyberSec Forum, an event serving as a platform for cooperation with state agencies and for intra-sector networking with other energy companies, aimed at developing consistent threat intelligence-sharing standards, procedures and mechanisms aligned with the objectives of NIS2 and the national cybersecurity system. The event was attended by both governmental and non-governmental representatives, as well as companies of the ORLEN Group. We also pursued a wide range of initiatives aimed at strengthening compliance with updated legal requirements, while also addressing our internal priorities and the evolving

cybersecurity threat landscape. Activities of the Cybersecurity Office, including CERT ORLEN, are fully integrated with the broader Digital Transformation and IT function, supporting the delivery of our business objectives.

In 2025, a number of initiatives were undertaken to achieve compliance with the provisions of the draft amendment to the Act on the National Cybersecurity System. In the process, we identified areas requiring a modification of existing security controls or the addition of new technical and organisational measures.

Our cybersecurity-related objectives form part of the objectives pursued by the Digital Transformation and IT area. The primary and overarching goal is to ensure the availability of information and communications assets at the agreed level, while also maintaining the target level of cybersecurity for IT and OT systems. We also plan to implement a centralised cybersecurity management model at selected strategic Group companies in 2026, and in our value chain by 2030.

# 6.13 Appendices

## 6.13.1 Disclosure requirements in ESRS compiled with in preparing the sustainability statement following the materiality assessment [IRO-2]

Table 126 Disclosure requirements covered [IRO-2]

| ESRS | Disclosure requirement | Location in the report |
|---|---|---|
| ESRS 2 | BP-1 General basis for preparation of the sustainability statement | Section 1.1.1 |
| | BP-2 Disclosures in relation to specific circumstances | Section 1.1.2 |
| | GOV-1 The role of the administrative, management and supervisory bodies | Section 1.1.3 |
| | GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies | Section 1.1.4 |
| | GOV-3 Integration of sustainability-related performance in incentive schemes | Section 1.1.5 |
| | GOV-4 Statement on due diligence | Section 1.1.6 |
| | GOV-5 Risk management and internal controls over sustainability reporting | Section 1.1.7 |
| | SBM-1 Strategy, business model and value chain | Section 1.1.8 |
| | SBM-2 Interests and views of stakeholders | Section 1.1.10 |
| | SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model | Section 1.1.11 |
| | IRO-1 Description of the process to identify and assess material impacts, risks and opportunities | Section 1.1.12 |
| | IRO-2 Appendices – Disclosure Requirements in ESRS covered by the undertaking's sustainability statement | Section 1.13.1 |
| ESRS E1 Climate change | E1-1 Transition plan for climate change mitigation | Section 1.3.1 |
| | E1-2 Policies related to climate change mitigation and adaptation | Section 1.3.2 |
| | E1-3 Actions and resources in relation to climate change policies | Section 1.3.3 |
| | E1-4 Targets related to climate change mitigation and adaptation | Section 1.3.4 |
| | E1-5 Energy consumption and mix | Section 1.3.5 |
| | E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions | Section 1.3.6 |
| | E1-7 GHG removals and GHG mitigation projects financed through carbon credits | Section 1.3.7 |
| | E1-8 Internal carbon pricing | Section 1.3.8 |
| ESRS E2 Pollution | E2-1 Policies related to pollution | Section 1.4.1 |
| | E2-2 Actions and resources related to pollution | Section 1.4.2 |
| | E2-3 Targets related to pollution | Section 1.4.3 |
| | E2-4 Pollution of air, water and soil | Section 1.4.4 |
| | E2-5 Substances of concern | Section 1.4.5 |
| | E2-5 Substances of very high concern | Section 1.4.6 |
| ESRS E3 Water and marine resources | E3-1 Policies related to water and marine resources | Section 1.5.1 |
| | E3-2 Actions and resources related to water and marine resources | Section 1.5.2 |
| | E3-3 Targets related to water and marine resources | Section 1.5.3 |
| | E3-4 Water consumption | Section 1.5.4 |

| ESRS | Disclosure requirement | Location in the report |
|---|---|---|
| ESRS E4 Biodiversity and ecosystems | E4-1 Transition plan and consideration of biodiversity and ecosystems in strategy and business model | Section 1.6.1 |
| | E4-2 Policies related to biodiversity and ecosystems | Section 1.6.2 |
| | E4-3 Actions and resources related to biodiversity and ecosystems | Section 1.6.3 |
| | E4-4 Targets related to biodiversity and ecosystems | Section 1.6.4 |
| | E4-5 Impact metrics related to biodiversity and ecosystems change | Section 1.6.5 |
| ESRS E5 Resource use and circular economy | E5-1 Policies related to resource use and circular economy | Section 1.7.1 |
| | E5-2 Actions and resources related to resource use and circular economy | Section 1.7.2 |
| | E5-3 Targets related to resource use and circular economy | Section 1.7.3 |
| | E5-4 Resource inflows | Section 1.7.4 |
| | E5-5 Resource outflows | Section 1.7.5 |
| ESRS S1 ORLEN Group own workforce | S1-1 Policies related to own workforce | Section 1.8.1 |
| | S1-2 Processes for engaging with own workforce and workers' representatives about impacts | Section 1.8.2 |
| | S1-3 Processes to remediate negative impacts and channels for own workforce to raise concerns | Section 1.8.3 |
| | S1-4 Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions | Section 1.8.4 |
| | S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | Section 1.8.5 |
| | S1-6 Characteristics of the undertaking's employees | Section 1.8.6 |
| | S1-8 Collective bargaining coverage and social dialogue | Section 1.8.7 |
| | S1-9 Diversity metrics | Section 1.8.9 |
| | S1-10 Adequate wages | Section 1.8.7 |
| | S1-11 Social protection | Section 1.8.7 |
| | S1-12 Persons with disabilities | Section 1.8.8 |
| | S1-13 Training and skills development metrics | Section 1.8.11 |
| | S1-14 Health and safety metrics | Section 1.8.7 |
| | S1-15 Work-life balance metrics | Section 1.8.7 |
| | S1-16 Remuneration metrics (pay gap and total remuneration) | Section 1.8.10 |
| | S1-17 Incidents, complaints and severe human rights impacts | Section 1.8.12 |
| ESRS S2 Workers in the value chain | S2-1 Policies related to value chain workers | Section 1.9.1 |
| | S2-2 Processes for engaging with value chain workers about impacts | Section 1.9.2 |
| | S2-3 Processes to remediate negative impacts and channels for value chain workers to raise concerns | Section 1.9.3 |
| | S2-4 Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions | Section 1.9.4 |
| | S2-5 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | Section 1.9.5 |
| ESRS S3 Affected communities | S3-1 Policies related to affected communities | Section 1.10.1 |
| | S3-2 Processes for engaging with affected communities about impacts | Section 1.10.2 |
| | S3-3 Processes to remediate negative impacts and channels for affected communities to raise concerns | Section 1.10.3 |

| ESRS | Disclosure requirement | Location in the report |
|---|---|---|
| | S3-4 Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions | Section 1.10.4 |
| | S3-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | Section 1.10.5 |
| ESRS S4 Consumers and end-users | S4-1 Policies related to consumers and end-users | Section 1.11.1 |
| | S4-2 Processes for engaging with consumers and end-users about impacts | Section 1.11.2 |
| | S4-3 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns | Section 1.11.3 |
| | S4-4 Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions | Section 1.11.4 |
| | S4-5 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | Section 1.11.5 |
| ESRS G1 Business conduct | G1-1 Business conduct policies and corporate culture | Section 1.12.1 |
| | G1-2 Management of relationships with suppliers | Section 1.12.2 |
| | G1-3 Prevention and detection of corruption and bribery | Section 1.12.4 |
| | G1-4 Incidents of corruption or bribery | Section 1.12.5 |
| | G1-5 Political influence and lobbying activities | Section 1.12.6 |
| | G1-6 Payment practices | Section 1.12.3 |

## Table 127 All datapoints that derive from other EU legislation [IRO-2] – Appendix B

| Disclosure Requirement and related datapoint | SFDR reference | Pillar 3 reference | Benchmark Regulation reference | EU Climate Law reference | Comment |
|---|---|---|---|---|---|
| ESRS 2 GOV-1 Board's gender diversity, paragraph 21(d) | Indicator No. 13 in Table 1 of Annex I | | Commission Delegated Regulation (EU) 2020/1816, Annex II | | |
| ESRS 2 GOV-1 Percentage of board members who are independent, paragraph 21(e) | | | Delegated Regulation (EU) 2020/1816, Annex II | | |
| ESRS 2 GOV-4 Statement on due diligence, paragraph 30 | Indicator No. 10 in Table 3 of Annex I | | | | |
| ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities, paragraph 40(d)i | Indicator No. 4 in Table 1 of Annex I | Regulation (EU) 575/2013, Article 449a; Commission Implementing Regulation (EU) 2022/2453 (6) Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk | Delegated Regulation (EU) 2020/1816, Annex II | | |
| ESRS 2 SBM-1 Involvement in activities related to chemical production, paragraph 40(d)ii | Indicator No. 9 in Table 2 of Annex I | | Delegated Regulation (EU) 2020/1816, Annex II | | |
| ESRS 2 SBM-1 Involvement in activities related to controversial weapons, paragraph 40(d)iii | Indicator No. 14 Table 1 of Annex I | | Delegated Regulation (EU) 2020/1818, Article 12(1); Delegated Regulation (EU) 2020/1816, Annex II | | |
| ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco, paragraph 40(d)iv | | | Delegated Regulation (EU) 2020/1818, Article 12(1); Delegated Regulation (EU) 2020/1816, Annex II | | |
| ESRS E1-1 Transition plan to reach climate neutrality by 2050, paragraph 14 | | | | Regulation (EU) 2021/1119, Article 2(1) | |
| ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks, paragraph 16(g) | | | Regulation (EU) 575/2013, Article 449a; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity | Delegated Regulation (EU) 2020/1818, Article 12.1(d) to (g) and Article 12.2 | |
| ESRS E1-4 GHG emission reduction targets, paragraph 34 | Indicator No. 4 in Table 2 of Annex I | Regulation (EU) 575/2013, Article 449a; Commission Implementing Regulation (EU) 2022/2453, Template 3: Banking book – Climate change transition risk: alignment metrics | Delegated Regulation (EU) 2020/1818, Article 6 | | |
| ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors), paragraph 38 | Indicator No. 5 in Table 1 and Indicator No. 5 in Table 2 of Annex I | | | | |
| ESRS E1-5 Energy consumption and mix, paragraph 37 | Indicator No. 5 in Table 1 of Annex I | | | | |
| ESRS E1-5 Energy intensity associated with activities in high climate impact sectors, paragraphs 40 to 43 | Indicator No. 6 in Table 1 of Annex I | | | | |
| ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions, paragraph 44 | Indicators Nos, 1 and 2 in Table 1 of Annex I | Regulation (EU) 575/2013, Article 449a; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity | Delegated Regulation (EU) 2020/1818, Article 5(1), Article 6 and Article 8(1) | | |
| ESRS E1-6 Gross GHG emissions intensity, paragraphs 53 to 55 | Indicator No. 3 Table 1 of Annex I | Regulation (EU) 575/2013, Article 449a; Commission Implementing Regulation (EU) 2022/2453, Template 3: | Delegated Regulation (UE) 2020/1818, Article 8(1) | | |

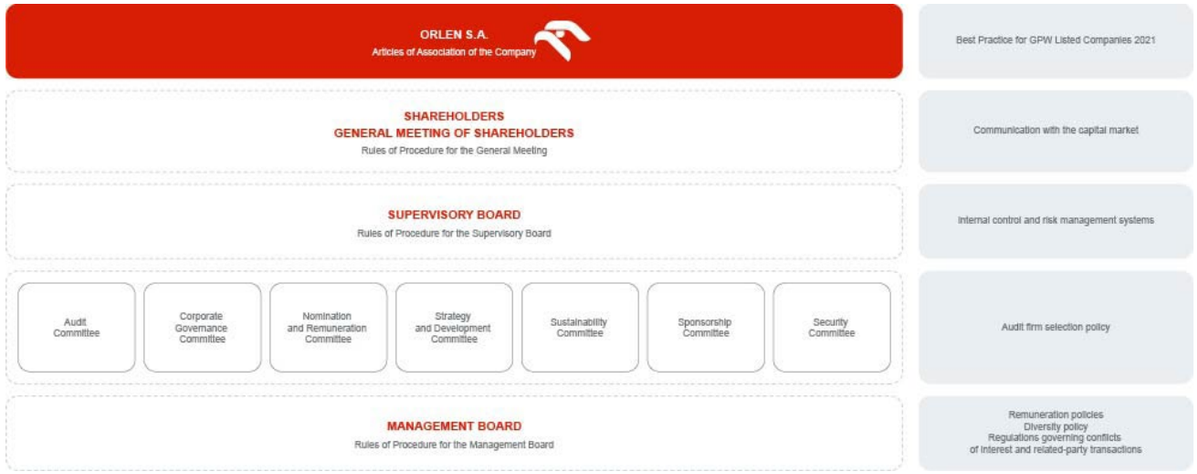
| Disclosure Requirement and related datapoint | SFDR reference | Pillar 3 reference | Benchmark Regulation reference | EU Climate Law reference | Comment |
|---|---|---|---|---|---|
| | | Banking book – Climate change transition risk: alignment metrics | | | |
| ESRS E1-7 GHG removals and carbon credits, paragraph 56 | | | | Regulation (EU) 2021/1119, Article 2(1) | |
| ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks, paragraph 66 | | | Delegated Regulation (EU) 2020/1818, Annex II; Delegated Regulation (EU) 2020/1816, Annex II | | This disclosure is not provided due to transitional provisions |
| ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk, paragraph 66(a)<br>ESRS E1-9 Location of significant assets at material physical risk, paragraph 66(c) | | Regulation (EU) 575/2013, Article 449a; Commission Implementing Regulation (EU) 2022/2453, points 46 and 47; Template 5: Banking book – Climate change physical risk: Exposures subject to physical risk. | | | This disclosure is not provided due to transitional provisions |
| ESRS E1-9 Breakdown of the carrying amount of real estate assets by energy-efficiency classes, paragraph 67(c) | | Regulation (EU) 575/2013, Article 449a; Commission Implementing Regulation (EU) 2022/2453, point 34 Template 2: Banking book – Climate change transition risk: Loans collateralised by immovable property – Energy efficiency of the collateral | | | This disclosure is not provided due to transitional provisions |
| ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities, paragraph 69 | | | Delegated Regulation (EU) 2020/1818, Annex II | | This disclosure is not provided due to transitional provisions |
| ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28 | Indicator No. 8 in Table 1 of Annex I, indicator No. 2 in Table 2 of Annex I, indicator No. 1 in Table 2 of Annex I, and indicator No. 3 in Table of 2 of Annex I | | | | |
| ESRS E3-1 Water and marine resources, paragraph 9 | Indicator No. 7 in Table 2 of Annex I | | | | |
| ESRS E3-1 Dedicated policy, paragraph 13 | Indicator No. 8 in Table 2 of Annex 1 | | | | |
| ESRS E3-1 Sustainable oceans and seas, paragraph 14 | Indicator No. 12 in Table 2 of Annex I | | | | Not applicable |
| ESRS E3-4 Total water recycled and reused, paragraph 28(c) | Indicator No. 6.2 in Table 2 of Annex I | | | | |
| ESRS E3-4 Total water consumption in m3 per net revenue on own operations, paragraph 29 | Indicator No. 6.1 in Table 2 of Annex I | | | | |
| ESRS 2 SBM 3-E4, paragraph 16(a)(i) | Indicator No. 7 in Table 1 of Annex I | | | | |
| ESRS 2 SBM-3 E4, paragraph 16(b) | Indicator No. 10 in Table 2 of Annex I | | | | |
| ESRS 2 SBM-3 E4, paragraph 16(c) | Indicator No. 14 Table 2 of Annex I | | | | |
| ESRS E4-2 Sustainable land/ agriculture practices or policies, paragraph 24(b) | Indicator No. 11 in Table 2 of Annex I | | | | |
| ESRS E4-2 Sustainable oceans / seas practices or policies, paragraph 24(c) | Indicator No. 12 in Table 2 of Annex I | | | | Not applicable |
| ESRS E4-2 Policies to address deforestation, paragraph 24(d) | Indicator No. 15 in Table 2 of Annex I | | | | |
| ESRS E5-5 Non-recycled waste, paragraph 37(d) | Indicator No. 13 in Table 2 of Annex I | | | | |
| ESRS E5-5 Hazardous waste and radioactive waste, paragraph 39 | Indicator No. 9 in Table 1 of Annex I | | | | |
| ESRS 2 SBM-3-S1 Risk of incidents of forced labour, paragraph 14(f) | Indicator No. 13 in Table 3 of Annex I | | | | |
| ESRS 2 SBM-3-S1 Risk of incidents of child labour, paragraph 14(g) | Indicator No. 12 in Table 3 of Annex I | | | | |

| Disclosure Requirement and related datapoint | SFDR reference | Pillar 3 reference | Benchmark Regulation reference | EU Climate Law reference | Comment |
|---|---|---|---|---|---|
| ESRS S1-1 Human rights policy commitments, paragraph 20 | Indicator No. 9 in Table 3 and indicator No. 11 in Table 1 of Annex I | | | | |
| ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21 | | | Delegated Regulation (EU) 2020/1816, Annex II | | |
| ESRS S1-1 Processes and measures for preventing trafficking in human beings, paragraph 22 | Indicator No. 11 in Table 3 of Annex I | | | | Not applicable |
| ESRS S1-1 Workplace accident prevention policy or management system, paragraph 23 | Indicator No. 1 in Table 3 of Annex I | | | | |
| ESRS S1-3 Grievance/complaints handling mechanisms, paragraph 32(c) | Indicator No. 5 in Table 3 of Annex I | | | | |
| ESRS S1-14 Number of fatalities and number and rate of work-related accidents, paragraph 88(b) and (c) | Indicator No. 2 in Table 3 of Annex I | | Delegated Regulation (EU) 2020/1816, Annex II | | |
| ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness, paragraph 88(e) | Indicator No. 3 in Table 3 of Annex I | | | | |
| ESRS S1-16 Unadjusted gender pay gap, paragraph 97(a) | Indicator No. 12 in Table 1 of Annex I | | Delegated Regulation (EU) 2020/1816, Annex II | | |
| ESRS S1-16 Excessive CEO pay ratio, paragraph 97(b) | Indicator No. 8 in Table 3 of Annex I | | | | |
| ESRS S1-17 Incidents of discrimination, paragraph 103(a) | Indicator No. 7 in Table 3 of Annex I | | | | |
| ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD guidelines, paragraph 104(a) | Indicator No. 10 in Table 1 and indicator No. 14 in Table 3 of Annex I | | Delegated Regulation (EU) 2020/1816, Annex II; Delegated Regulation (EU) 2020/1818, Article 12(1) | | |
| ESRS 2 SBM-3 S2 Significant risk of child labour or forced labour in the value chain, paragraph 11(b) | Indicators Nos. 12 and 13 in Table 3 of Annex I | | | | |
| ESRS S2-1 Human rights policy commitments, paragraph 17 | Indicator No. 9 in Table 3 and indicator No. 11 in Table 1 of Annex I | | | | |
| ESRS S2-1 Policies related to value chain workers, paragraph 18 | Indicators Nos. 11 and 4 in Table 3 of Annex I | | | | |
| ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines, paragraph 19 | Indicator No. 10 in Table 1 of Annex I | | Delegated Regulation (EU) 2020/1816, Annex II; Delegated Regulation (EU) 2020/1818, Article 12(1) | | |
| ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19 | | | Delegated Regulation (EU) 2020/1816, Annex II | | |
| ESRS S2-4 Human rights issues and incidents connected to the undertaking's upstream and downstream value chain, paragraph 36 | Indicator No. 14 in Table 3 of Annex I | | | | |
| ESRS S3-1 Human rights policy commitments, paragraph 16 | Indicator No. 9 in Table 3 of Annex I and indicator No. 11 in Table 1 of Annex I | | | | |
| ESRS S3-1 Non-respect of UNGPs on Business and Human Rights, ILO principles or/and OECD guidelines, paragraph 17 | Indicator No. 10 in Table 1 of Annex I | | Delegated Regulation (EU) 2020/1816, Annex II; Delegated Regulation (EU) 2020/1818, Article 12(1) | | |
| ESRS S3-4 Human rights issues and incidents, paragraph 36 | Indicator No. 14 in Table 3 of Annex I | | | | |

| Disclosure Requirement and related datapoint | SFDR reference | Pillar 3 reference | Benchmark Regulation reference | EU Climate Law reference | Comment |
|---|---|---|---|---|---|
| ESRS S4-1 Policies related to consumers and end-users, paragraph 16 | Indicator No. 9 in Table 3 and indicator No. 11 in Table 1 of Annex I | | | | |
| ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines, paragraph 17 | Indicator No. 10 in Table 1 of Annex I | | Delegated Regulation (EU) 2020/1816, Annex II; Delegated Regulation (EU) 2020/1818, Article 12(1) | | |
| ESRS S4-4 Human rights issues and incidents, paragraph 35 | Indicator No. 14 in Table 3 of Annex I | | | | |
| ESRS G1-1 United Nations Convention against Corruption, paragraph 10(b) | Indicator No. 15 in Table 3 of Annex I | | | | |
| ESRS G1-1 Protection of whistle-blowers, paragraph 10(d) | Indicator No. 6 in Table 3 of Annex I | | | | |
| ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws, paragraph 24(a) | Indicator No. 17 in Table 3 of Annex I | | Delegated Regulation (EU) 2020/1816, Annex II | | |
| ESRS G1-4 Standards of anti-corruption and anti-bribery, paragraph 24(b) | Indicator No. 16 in Table 3 of Annex I | | | | |

# 7. Statement of compliance with corporate governance standards

Figure 21 ORLEN S.A.'s corporate governance framework




## 7.1 Corporate governance statement

- As a company listed on the Warsaw Stock Exchange (“WSE”), ORLEN S.A. (the “Company”, “ORLEN”) is required to comply with the WSE corporate governance standards.
- The corporate governance framework currently in place on the Warsaw Stock Exchange (“WSE”) is the Best Practice for GPW Listed Companies 2021 (“Best Practice 2021”). It was adopted by the WSE Supervisory Board on 29 March 2021 and has been in effect since 1 July 2021.
- Adherence to the Best Practice 2021 principles is voluntary for WSE-listed companies. However, the WSE Rules require that listed companies inform market participants about their level of compliance – specifically, which principles they follow, which they do not, and how they apply the ones they adopt.
- The Best Practice 2021 document is available on the WSE’s website at https://www.gpw.pl/dobre-praktyki and on the ORLEN website at: https://www.orlen.pl/pl/relacje-inwestorskie/dla-inwestora/lad-korporacyjny. This website section also contains the Company’s up-to-date statement of compliance with the corporate governance standards defined in Best Practice 2021;
- ORLEN, as a company with the State Treasury as a shareholder, complies with the guidelines and recommendations on corporate governance set out in the following documents: Best Practices for Conducting Sports Sponsorship by Companies with State Treasury Shareholding (April 2025) and the Code of Best Practices for Ownership Supervision (January 2026), issued by the Chancellery of the Prime Minister of the Republic of Poland;
- The above-mentioned documents are available on the official website of the Chancellery of the Prime Minister at: https://www.gov.pl/web/premier/lad-korporacyjny2.

### Exceptions in the application of corporate governance principles

In 2025, the Company published one report on an incident of non-compliance with Best Practice 2021. It involved a breach of principle 4.9.1., which occurred as a result of a shareholder nominating candidates for the Supervisory Board one day before the Annual General Meeting convened for 5 June 2025. There were no prior incidents of non-compliance with this principle in the last two years. In addition, there were no other incidents of non-compliance with Best Practice 2021 at the Company. As at the issue date of this Report, ORLEN complied with all Best Practice 2021 principles, with the exception of four, which relate to diversity policy and holding electronic General Meetings.

Table 128 Exceptions in the application of corporate governance principles

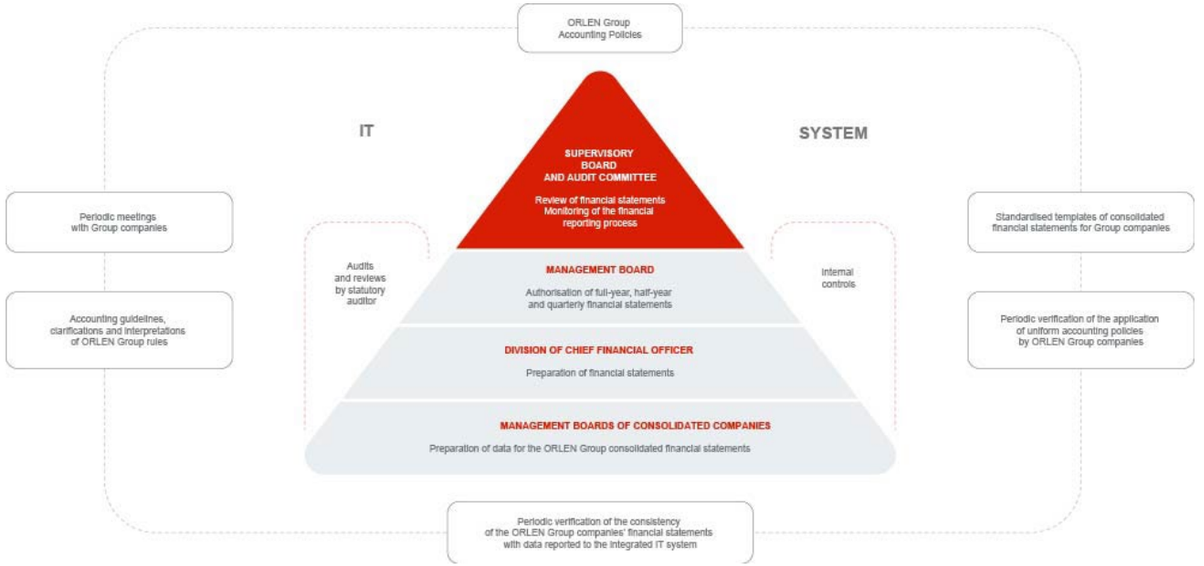
| Best Practice principle: | Reasons for non-compliance |
|---|---|
| “Principle 2.1. Companies should have in place a diversity policy applicable to the management board and the supervisory board, approved by the supervisory board and the general meeting, respectively. The diversity policy defines diversity goals and criteria, among others including gender, education, expertise, age, professional experience, and specifies the target dates and the monitoring systems for such goals. With regard to gender diversity of corporate bodies, the participation of the minority group in each body should be at least 30%.” | As at the date of authorisation of this Report, the Company had no formal document in place specifying diversity goals and criteria for the Management Board and the Supervisory Board. At the same time, the Company takes action to promote diversity and equal treatment across its workforce through its existing HR processes and practices.<br><br>In 2021, ORLEN S.A. adopted the Diversity Policy, an internal document defining the Company’s approach to promoting diversity, equal treatment and anti-discrimination. The policy sets out principles relating to equal treatment in recruitment, promotions, access to training, work-life balance, anti-bullying measures and protection against unjustified dismissal. Since 2023, the Diversity Policy has also been implemented across other ORLEN Group companies. Although the Company has not adopted a separate formal diversity policy specifically for the Management Board and the Supervisory Board, it also takes steps to ensure diversity at the level of its highest governing bodies. As at the end of the 2025 financial year, the composition of the Supervisory Board |

| Best Practice principle: | Reasons for non-compliance |
|---|---|
| "Principle 2.2. Decisions to elect members of the management board or the supervisory board of companies should ensure that the composition of those bodies is diverse by appointing persons ensuring diversity, among others in order to achieve the target minimum participation of the minority group of at least 30% according to the goals of the established diversity policy referred to in principle 2.1." | met the gender diversity criterion, with the minority group accounting for 33.3% of its members. Diversity was also ensured in terms of educational background, specialist expertise, age and professional experience. In the case of the Management Board, gender diversity had not been achieved as at the end of 2025; however, diversity was ensured in terms of age, educational background, specialist expertise and professional experience. Members of the Management Board are selected through an open recruitment procedure designed to assess candidates' competencies and appoint the best person for the role, in line with the principles of equal opportunity and non-discrimination. Importantly, the Company does not exclude any group of candidates from participating in such procedures and does not apply any criteria that could lead to discrimination. Selection is based solely on competencies, experience and fulfilment of statutory requirements, with the process remaining fully open to both men and women. The Company remains ready to promote gender diversity on the Management Board as long as the recruitment process provides a genuine choice between candidates representing both groups. |
| "Principle 2.11.6. In addition to its responsibilities laid down in the legislation, once a year the supervisory board prepares an annual report and submits it for approval by the annual general meeting.<br>Such report includes at least the following: information regarding the degree of implementation of the diversity policy applicable to the management board and the supervisory board, including the achievement of goals referred to in principle 2.1." | The Company also consistently pursues measures aimed at ensuring equal treatment in all areas of employment, including equal pay for women and men. Under ORLEN S.A.'s segment-based management model, the Company oversees pay transparency across the ORLEN Group. It also monitors pay differentials and supervises the implementation across Group companies of common standards and employment provisions designed to eliminate any forms of pay discrimination, including discrimination based on age or gender.<br>Regulations in place across individual ORLEN Group companies clearly state that remuneration levels depend on the position held, scope of responsibilities and employee competencies, rather than on personal characteristics such as gender.<br>The Group's gender pay gap is calculated based on the relationship between remuneration and average headcount and is disclosed in the ORLEN Group's sustainability reports. The data is presented separately for managerial, sales, production and other roles, ensuring transparency and enabling assessment of the measures taken by the Company in the area of pay equality. |

| Best Practice principle: | Reasons for non-compliance |
|---|---|
| "Principle 4.1. Companies should enable their shareholders to participate in a general meeting by means of electronic communication (e-meeting) if justified by the expectations of shareholders notified to the company, provided that the company is in a position to provide the technical infrastructure necessary for such general meeting to proceed." | At present, the Company does not offer the option to attend the General Meeting via means of electronic communication and therefore does not comply with the above principle of Best Practice 2021.<br>The Company believes that non-compliance with principle 4.1. does not affect the reliability of the Company's disclosure policy and does not hinder shareholders' attendance at General Meetings. The Company broadcasts General Meetings in real time and shares video recordings in the Investor Relations section of its corporate website at: https://www.orlen.pl/pl/relacje-inwestorskie/dla-inwestora/walne-zgromadzenie. This website section also contains all information regarding scheduled and past General Meetings of ORLEN S.A. |

## 7.2 Internal control and risk management systems related to the financial reporting process

Figure 22 Internal control and risk management systems related to the financial reporting process



## Oversight of the application of uniform accounting policies by ORLEN Group companies for the purposes of preparing the ORLEN Group's consolidated financial statements

To ensure a uniform approach to applying accounting policies aligned with the International Financial Reporting Standards endorsed by the European Union (IFRS) across the ORLEN Group, ORLEN Group Accounting Policies have been developed. The principles set out in the Accounting Policies form the basis for preparing separate financial statements of ORLEN S.A. and consolidated financial statements of the ORLEN Group. The Accounting Policies are updated whenever required by changes in applicable laws and regulations, in particular IFRS and other regulations applicable to the preparation of financial statements. These updates are intended to ensure that our accounting policies remain compliant with current requirements and that the financial disclosures are consistent and comparable.

In addition, to support the uniform and consistent application of accounting policies, ORLEN Group companies are provided with accounting guidelines, as well as clarifications and interpretations of the accounting principles applicable across the ORLEN Group. Periodic meetings are also held with Group companies to ensure the accuracy of the reported data forming the basis for the preparation of the ORLEN Group's consolidated financial statements.

Each year, ORLEN Group companies receive standard templates for their separate financial statements. To ensure compliance, we periodically verify that ORLEN Group companies apply the uniform Accounting Policies with respect to recognition, measurement and completeness of disclosures in accordance with IFRS. Furthermore, we check consistency of the ORLEN Group companies' separate financial statements with data reported to the integrated IT system used to prepare the Group's consolidated financial statements.

## Procedures for the authorisation, approval and review of ORLEN S.A.'s separate financial statements and the ORLEN Group's consolidated financial statements

ORLEN S.A. has implemented financial statement authorisation procedures. ORLEN S.A.'s full-year separate financial statements, the ORLEN Group's full-year consolidated financial statements, and the quarterly and half-year reports are authorised for issue by the ORLEN S.A. Management Board. In addition, ORLEN S.A.'s full-year separate financial statements and the ORLEN Group's full-year consolidated financial statements are submitted for review to the Company's Supervisory Board before they are issued. Oversight of the preparation of financial statements rests within the division of the ORLEN S.A. Chief Financial Officer, while the Management Boards of the companies included in the consolidation are responsible for preparing the reporting data for the ORLEN Group's consolidated financial statements.

Within the ORLEN S.A. Supervisory Board, the Audit Committee oversees the financial reporting process, the effectiveness of the internal control and risk management systems, and cooperation with the statutory auditor.

## Internal control processes; ensuring compliance and correctness of accounting policies applied by the ORLEN Group

The relevant ORLEN S.A. functions monitor on an ongoing basis changes in regulations, including accounting, reporting and tax regulations, and make relevant adjustments to processes and IT systems.

In addition, they analyse guidelines, recommendations and other guidance issued by the competent supervisory authorities, including the Polish Financial Supervision Authority (KNF), the European Securities and Markets Authority (ESMA) and the Polish Audit Oversight Agency (PANA). Verification is undertaken to check whether they are properly implemented and taken into account in the separate and consolidated financial statements.

ORLEN S.A. has procedures in place for recording business transactions in the finance and accounting system, together with controls to ensure adherence to those procedures. These controls include, in particular, segregation of duties, multi-level data authorisation, verification of the accuracy of data received, and independent checks of the accuracy of data entered.

In addition, ORLEN S.A. operates a separate audit process within its Integrated Management System, designed to provide effective and consistent oversight of key operational and support processes.

## IT systems

The financial statements of ORLEN Group companies are prepared on the basis of accounting records maintained using ERP-class finance and accounting systems equipped with built-in controls for document workflow and the proper recording of business transactions. The process of preparing the consolidated financial statements is supported by a dedicated IT system, which ensures data consistency, control and the timely reporting of consolidation data.

The IT and organisational solutions used by ORLEN Group companies ensure appropriate access control for finance and accounting systems, as well as the protection and archiving of accounting books.

## Audits and reviews of financial statements by an independent statutory auditor

The full-year financial statements of ORLEN S.A. and the full-year consolidated financial statements of the ORLEN Group are audited by a statutory auditor.

Interim reports for the first and third quarters, as well as half-year reports, undergo a review by a statutory auditor.

ORLEN S.A. applies the Audit Firm Selection Procedure, adopted by the Supervisory Board, which sets out the rules and process for selecting the statutory auditor, taking into account the requirements of independence, mandated rotation periods, objectivity and professional experience. This procedure ensures transparency in the auditor selection process and compliance with the applicable laws and regulations.

On 29 October 2024, in accordance with the ORLEN S.A. Audit Firm Selection Policy, the Company's Supervisory Board selected KPMG Audyt spółka z ograniczoną odpowiedzialnością sp.k. as the statutory auditor authorised to audit the separate financial statements of ORLEN S.A. and the consolidated financial statements of the ORLEN Group for the financial years 2025–2026, and to review the interim separate financial statements of ORLEN S.A. and consolidated financial statements of the ORLEN Group for the first quarter, third quarter, and first half of 2025 and 2026.

For information on the remuneration arising from the agreement with the entity authorized to audit financial statements, see Section 15.7 of the Consolidated Financial Statements for the year 2025.

For information on the internal control and risk management systems relating to sustainability reporting, see Section 6 of this Report.

The enterprise risk management system (ERM) is described in Section 4.6 of this Report.

## 7.3 Shareholders and General Meeting of Shareholders

### Shareholders

- Each ORLEN S.A. share carries one vote at the Company's General Meeting.
- In accordance with regulations governing the Polish capital market, ORLEN S.A. is notified only about shareholders holding 5% or more of total voting rights in the Company.
- There are no preference shares in ORLEN S.A.'s share capital.

Table 129 ORLEN S.A.'s shareholding structure as at 1 January 2025 and 31 December 2025 and as at the date of authorisation of this Report

| Shareholder | Number of shares and voting rights in the Company (as at 1 Jan 2025)[1] | % of share capital and total voting rights held in the Company (as at 1 Jan 2025)[1] | Number of shares and voting rights in the Company (as at 31 Dec 2025 and this Report authorisation date)[2] | % of share capital and total voting rights held in the Company (as at 31 Dec 2025 and this Report authorisation date)[2] |
|---|---|---|---|---|
| State Treasury | 579,310,079 | 49.90% | 579,310,079 | 49.90% |
| Nationale-Nederlanden OFE[1] | 66,451,874 | 5.72% | 60,004,000 | 5.17% |
| Other | 515,180,096 | 44.38% | 521,627,970 | 44.93% |
| Total | 1,160,942,049 | 100.00% | 1,160,942,049 | 100.00% |

1) Based on information from the Extraordinary General Meeting held on 2 December 2024.
2) Based on information from the Extraordinary General Meeting held on 13 November 2025, resumed after an adjournment announced on 28 October 2025.

### Restrictions on transferability of shares

- The Articles of Association do not impose any restrictions on the transferability of ORLEN S.A. shares. However, such restrictions may be stipulated by generally applicable laws including, without limitation, the Act on State Property Management and the Act on Control of Certain Investments.

### Exercising voting rights and shareholders' special control powers

- Detailed rules for the exercise of special control powers and voting rights are laid down in ORLEN S.A.'s Articles of Association.
- The voting rights of shareholders have been capped in the Articles of Association so that none of them may exercise more than 10% of total voting rights existing in the Company as at the date when the General Meeting is held. The cap on voting rights does not apply to the State Treasury and the depositary bank that has issued depositary receipts in respect of Company shares under an agreement with the Company (if the bank exercises voting rights conferred by Company shares).
- Shareholders whose voting rights are subject to aggregation and reduction are referred to as a Shareholder Grouping. Voting right aggregation involves adding up the voting rights held by individual shareholders forming part of the Shareholder Grouping, while voting right reduction entails decreasing the total number of voting rights held at the General Meeting by shareholders forming part of the Shareholder Grouping. Shareholders forming part of a Shareholder Grouping cannot exercise voting rights exceeding 10% of total voting rights existing in the Company on the

day of the General Meeting. The principles of voting right aggregation and reduction, as well as the definition of a shareholder, are detailed in the Company's Articles of Association.

- The cap on voting rights referred to above does not apply to subsidiaries of the State Treasury.
- The State Treasury has the right to appoint and remove one member of the Supervisory Board and to appoint one member of the Management Board.
- The State Treasury, irrespective of its ownership interest in the Company, may request the convening of an Extraordinary General Meeting and the placement of a specific matter on the agenda of the upcoming General Meeting.
- A resolution granting consent to transactions involving any sale or encumbrance of shares in the following companies: Naftoport Sp. z o.o., Inowrocławskie Kopalnie Soli Solino S.A., and any company to be established to operate the pipeline transport of liquid fuels, requires a vote in favour of its adoption by the Supervisory Board member appointed by the State Treasury.
- The Company carries out tasks aimed at ensuring Poland's energy security. Therefore, the State Treasury in its capacity as the Company shareholder has the right to:
  - request that the Company's Management Board report in detail on the tasks executed by the Company to ensure Poland's energy security,
  - receive from the Company's Management Board, no later than two months after the closing of an Annual General Meeting, information on the implementation by the Company of strategic investment projects or its involvement in investment projects which are necessary to ensure Poland's energy security,
  - receive detailed information on decisions made by the General Meeting of an ORLEN Group companies, together with an assessment of their implications for Poland's energy security.

The scope of information to be provided and the catalogue of such information are detailed in Article 9.12-9.13 of the Articles of Association.

- The State Treasury and the minister competent for energy are entitled to receive from the Company economic and financial analyses of the Company and its Group companies acting as distribution system operators or storage system operators.
- The minister competent for energy, if requested by the Management Board of the Company and having received the opinion of the entity authorised to exercise rights attached to the shares held by the State Treasury, has the power to grant approval for:
  - amendments to material provisions of existing contracts for natural gas imports to Poland and execution of new contracts,
  - implementation by the Company of a strategic investment project or its involvement in an investment project which may be detrimental to the Company's economic efficiency but which is necessary to carry out a national energy security task in connection with:
    a) ensuring continuity of natural gas supplies to customers and maintaining the required emergency stocks of natural gas,
    b) ensuring safe operation of gas networks,
    c) balancing the gas market and managing the operations and capacity of energy facilities and equipment connected to the national gas grid,
    d) natural gas production.
- The State Treasury approves the Management Board's recommendations for appointment or removal of the Company's representatives on the Management Board and Supervisory Board of System Gazociągów Tranzytowych EuRoPol GAZ S.A.
- Special powers may also be vested in the State Treasury under generally applicable laws, i.e.:
  - the Act on Special Powers Vested in the Minister Competent for Energy and their Exercise in Certain Limited Companies or Groups Operating in the Electricity, Crude Oil and Gas Fuel Sectors,
  - the Act on Control of Certain Investments,
  - the Act on State Property Management.

## Amendments to Articles of Association

- Any amendment to the ORLEN S.A. Articles of Association requires a resolution of the General Meeting and, to take effect, has to be entered in the Business Register. A resolution of the General Meeting to amend the Articles of Association is passed by a three-quarters majority of votes. The General Meeting may authorise the Supervisory Board to restate the Articles of Association or make other editorial changes as set out in a resolution passed by the General Meeting.
- Amendments made to the Articles of Association in 2025 included:
  - amendments to the definitions of 'Fuels' and 'Energy' in Article 1(4), introduced to broaden and update the definitions so that they reflect current market realities, regulatory requirements, and the Company's strategic development priorities;
  - amendments to the list of actions taken in the ordinary scope of business contained in Article 8(12)(6) of the Articles of Association, introduced in connection with the proposed broader definition of 'Fuels'. In its revised form, the list of activities taken in the ordinary course of business was made uniform and expanded to include actions that the Company actually undertakes as part of its day-to-day operations in such areas as fuel trading, purchase or sale and fuel-related services (including storage, transmission, distribution, regasification, and liquefaction services), as well as energy trading and related activities (including energy generation, conversion, transmission, storage, distribution and use processes);

  - amendments to Article (8)(11)(5), whereby the scope of powers and responsibilities of the Supervisory Board was extended to include selection of the audit firm to provide assurance of the Group's sustainability reporting.
- The amendments were adopted by the Extraordinary General Meeting on 28 October 2025 and subsequently registered in the National Court Register on 28 November 2025.

## Powers and responsibilities of the governing bodies

The operation of ORLEN's Supervisory Board and its committees and of ORLEN's Management Board is governed by:

- generally applicable laws,
  - the Commercial Companies Code of 15 September 2000 (consolidated text: Dz. U. of 2024, item 18, as amended) (the "Commercial Companies Code"),
  - the Act on State Property Management of 16 December 2016 (consolidated text: Dz. U. of 2024, item 125, as amended) (the "Act"),
- the ORLEN S.A. Articles of Association,
- the Rules of Procedure for the Supervisory Board,
- the Rules of Procedure for the Management Board.

## Table 130 Powers and responsibilities of governing bodies

| | Commercial Companies Code | Company documents | Articles of Association / Rules of Procedure | Operation; appointment and removal from office |
|---|---|---|---|---|
| **General Meeting** | Article 393<br>-<br>Article 429 | Article 7 of the Articles of Association<br><br>Rules of Procedure for the General Meeting | General Meeting resolutions are required for matters specified in the Commercial Companies Code and the Company's Articles of Association, including:<br>• appointing members of the Supervisory Board (except for member of the Supervisory Board appointed by the State Treasury) and defining rules for their remuneration;<br>• adopting a remuneration policy for members of the Management Board and Supervisory Board;<br>• disposing of real property, or perpetual usufruct of or interest in real property, where the net carrying amount of the asset exceeds one-twentieth of the Company's share capital;<br>• subscribing for, or acquiring or disposing of shares in Group companies which operate, under generally applicable laws, a natural gas distribution or storage system, and defining the terms of and procedure for the subscription, acquisition or disposal, as the case may be;<br>• setting the aggregate cap on fees that the Company may pay to all advisers to the Supervisory Board over a financial year;<br>• cancelling or rescheduling a General Meeting if extraordinary circumstances prevent it from being held or if it is no longer required, by posting a relevant notice on the Company's website, which must contain a statement for reasons for such action.<br><br>• The General Meeting may be attended by persons invited by the body convening the General Meeting or allowed to enter the meeting room by the Chair of the General Meeting; such invitees include in particular qualified auditors, legal and financial advisers, and Company employees; representatives of the media.<br>• Shareholders are entitled to attend the General Meeting provided they hold Company shares as at the record date, which falls 16 days prior to the date of the General Meeting.<br>• The General Meeting may be attended by members of the Management Board or the Supervisory Board, including persons whose mandates expired before the Annual General Meeting date but who served on the Management Board or Supervisory Board in the financial year covered by the financial statements that the General Meeting is to approve.<br>• The Management Board is required to ensure that the General Meeting is attended by an independent third-party expert in commercial law. | • The General Meeting is convened, prepared and held in accordance with the rules set out in the Commercial Companies Code, the Articles of Association and the Rules of Procedure for the General Meeting.<br>• The General Meeting is convened by publishing a relevant notice on the Company's website and through a current report.<br>• The Annual General Meeting is convened within a timeframe ensuring that it takes place no later than within six months from the end of each financial year.<br>• The Management Board convenes an Extraordinary General Meeting on its own initiative, at the request of the Supervisory Board, at the request of a shareholder or shareholders representing at least one-twentieth of the Company's share capital, or at the request of the State Treasury as a Company shareholder, irrespective of its ownership interest in the Company. An Extraordinary General Meeting may also be convened by shareholders representing at least half of the share capital of or total voting rights in the Company. An Extraordinary General Meeting may be convened by the Supervisory Board in situations specified in the Articles of Association.<br>• Resolutions of the General Meeting are passed by an absolute majority of votes, unless the Commercial Companies Code or the Articles of Association provide otherwise.<br>• A shareholder or shareholders representing at least one-twentieth of the share capital may request that certain matters be placed on the agenda of the upcoming General Meeting by submitting a relevant request no later than 21 days before its scheduled date. The same right is held by the State Treasury as a Company shareholder, irrespective of its ownership interest in the Company.<br>• Shareholders may exercise their voting rights at the General Meeting in person or by proxy. |
| **Supervisory Board** | Article 368<br>-<br>Article 380 | Article 8 of the Articles of Association<br><br>Rules of Procedure for the Supervisory Board | • The Supervisory Board exercises ongoing supervision over the Company's operations. A detailed list of matters which require a decision by the Supervisory Board is provided in Article 8 of the Articles of Association. The powers and responsibilities of the Supervisory Board include matters specified in the Commercial Companies Code, with due regard to the Rules of Procedure for the Supervisory Board.<br>• In addition to its responsibilities laid down in generally applicable laws, in particular Article 382(3) and 382(3)(1) of the Commercial Companies Code, the Supervisory Board prepares and submits for approval by the Annual General Meeting an annual report containing at least:<br><br>a) information on the composition of the Supervisory Board and its committees, specifying criteria resulting from the Best Practice for GPW Listed Companies;<br><br>b) a summary of the activities of the Supervisory Board and its committees; | • The Supervisory Board consists of six to fifteen members, including its Chair.<br>• One member of the Supervisory Board is appointed and removed by the entity authorised to exercise the rights attached to the shares held by the State Treasury, as long as the State Treasury holds at least one share in the Company. The other Supervisory Board members are appointed and removed by the General Meeting.<br>• Supervisory Board members are appointed for a joint term of office expiring on the date of the Annual General Meeting that approves the financial statements for the second full financial year of the term.<br>• At least two Supervisory Board members must meet the independence criteria under the ORLEN S.A. Articles of Association.<br>• Before being appointed to the Supervisory Board, candidates must represent to the Company in writing that they meet the independence criteria under the Articles of |

| | Commercial Companies Code | Company documents | Articles of Association / Rules of Procedure | Operation; appointment and removal from office |
|---|---|---|---|---|
| | | | c) assessment of the Company's standing on a consolidated basis, including evaluation of the internal control, risk management and compliance systems and the internal audit function;<br>d) assessment of the Company's compliance with the corporate governance standards and disclosure requirements;<br>e) assessment of the appropriateness of the Company's and the Group's sponsorship and donation spending;<br>f) remuneration report;<br>g) assessment of the discharge by the Management Board of its obligation to report information to the Supervisory Board as required under the Commercial Companies Code. | Association, the Act on Statutory Auditors, Audit Firms and Public Oversight, and Best Practice 2021. These representations are submitted to the other Supervisory Board members and to the Management Board.<br>• A Supervisory Board member must immediately notify the other members of the Supervisory Board and the Management Board of any changes in circumstances relevant to his/her independence status. Upon such notice, the Supervisory Board examines whether any actual relationships or circumstances exist that could affect the Supervisory Board member's satisfaction of the independence criteria. If the number of independent members of the Supervisory Board falls below two, the Management Board is required to promptly convene a General Meeting to change the composition of the Supervisory Board.<br>• The following require consent of at least half of the independent members of the Supervisory Board: benefits provided by the Company or its related entities to Management Board members, execution of a material related-party transaction, and the selection of the audit firm to audit the Company's financial statements.<br>• The Chair of the Supervisory Board is elected and removed from office by the General Meeting. The Deputy Chair and Secretary are elected from among other Supervisory Board members and removed from office by the Supervisory Board.<br>• Meetings of the Supervisory Board are held on an as-needed basis, but at least once every two months.<br>• Meetings are convened by the Chair of the Supervisory Board or by other persons as specified in the Articles of Association.<br>• A Supervisory Board meeting may be held if all the Supervisory Board members have been duly invited. Meetings may also be held without being formally convened, provided that all Supervisory Board members are present and agree to hold a meeting and to include specific matters on its agenda.<br>• The Supervisory Board may adopt resolutions if at least half of its members are present at the meeting.<br>• Resolutions of the Supervisory Board may be voted on by written ballot or using means of remote communication.<br>• Resolutions are passed by an absolute majority of votes, except for resolutions to remove from office or suspend from duties any or all members of the Management Board, which require that at least two-thirds of all Supervisory Board members vote in favour of such resolution. In the event of a voting tie, the Chair has the casting vote.<br>• Members of the Supervisory Board may vote on resolutions by casting a written ballot through another member of the Supervisory Board.<br>• A Supervisory Board member is required to inform the other Members of the Supervisory Board of any conflicts of interest which have arisen or may arise, and to abstain from taking the floor when the matter which has given rise to the conflict is being discussed, and abstain from voting on the relevant resolution. |
| **Management Board** | Article 381<br>- | Article 9 of the Articles of Association | Management Board resolutions are required for:<br>• any matters falling outside the ordinary course of business, as specified in the Rules of Procedure for the Management Board; | • The Management Board consists of five to eleven members, including the President, Vice Presidents and other members of the Management Board.<br>• One member of the Management Board is appointed by the entity authorised to exercise the rights attached to the shares held by the State Treasury, as long as the State |

| | Commercial Companies Code | Company documents | Articles of Association / Rules of Procedure | Operation; appointment and removal from office |
|---|---|---|---|---|
| | Article 392 | Rules of Procedure for the Management Board | • disposal of real property, perpetual usufruct right to or interest in real property;<br>• acquisition of real property, perpetual usufruct right to or interest in real property;<br>• matters referred to in Article 2(6) of the Articles of Association;<br>• adoption of organisational rules for the Company's business.<br><br>The Management Board has authority over all matters which are not reserved to the exclusive scope of competence of the Company's other governing bodies under the Commercial Companies Code or the Articles of Association and which fall outside the ordinary course of business, including:<br><br>• adopting annual and long-term budgets and growth strategies for the Company;<br>• approving the implementation of an investment project and assuming related liabilities if these involve expenditure or charges exceeding PLN 50 million;<br>• incurring liabilities, disposing of property rights, and encumbering in any way the Company's assets with a value exceeding PLN 50 million (subject to exceptions);<br>• acquiring or disposing of real property, or perpetual usufruct of or interest in real property, or granting limited rights in rem to real property;<br>• disposing of, acquiring, or encumbering shares or other equity interests in other entities, including shares admitted to public trading;<br>• effecting issuance of securities by the Company;<br>• adopting or amending the employee remuneration scheme or introducing or structuring an incentive scheme;<br>• concluding, amending, or terminating a collective bargaining agreement in effect at the Company or other trade union agreements.<br>• A resolution of the Management Board is also required for incurring liabilities in legal transactions involving:<br><br>– trading in crude oil or other hydrocarbon feedstock used to produce fuels in a refinery, excluding biocomponents and fuel additives, where the transaction volume exceeds 165,000 tonnes of crude oil or other hydrocarbon feedstock, excluding biocomponents and fuel additives;<br>– trading in natural gas or trading in natural gas transmission, distribution, or storage system capacities in Poland or abroad, or trading in natural gas storage capacities in Poland or abroad where the transaction volume exceeds 100 million Nm³;<br>– acquiring biocomponents and biofuels, including raw materials for the production of biocomponents and biofuels, where the transaction value exceeds PLN 200 million;<br>– selling or purchasing refining products in international commercial transactions where the transaction volume exceeds 90 thousand tonnes, excluding heavy fuel oil;<br>– submitting a bid or proposal in a public procurement/contract award procedure (including participation in related contract negotiations) concerning wholesale trade in refining products or vehicle fleet fuel cards where the transaction value exceeds PLN 200 million;<br>– trading in energy, tradeable rights attached to certificates of origin of electricity or energy efficiency certificates, guarantees of origin and documents confirming their issue, and related energy ranges, as well as providing electricity grid ancillary services and handling any activities related to customers' switching to a different electricity supplier where the transaction volume exceeds 300 GWh;<br>– submitting a bid in a contract award procedure (including one conducted under the Public Procurement Law) concerning trading in (separately or jointly) energy or energy-related services or products (including participation in contract negotiations or other actual or legal transactions related to the contract) and | Treasury holds at least one share in the Company. The other members are appointed by the Supervisory Board following a recruitment process.<br>• All members of the Management Board are removed from office by the Supervisory Board.<br>• Management Board members are appointed for a joint term of office expiring on the date of the Annual General Meeting that approves the financial statements for the second full financial year of the term.<br><br>A candidate to the Management Board must meet all of the following criteria:<br><br>• he/she has a university degree obtained in Poland or a university degree obtained abroad and recognised in Poland;<br>• he/she has at least five years' experience working under a contract of employment, including a contract of employment with a cooperative as a member thereof, serving in an elected or appointed position, providing services under other agreement, and/or transacting business as a sole trader;<br>• he/she has at least three years' experience serving in managerial or independent positions or transacting business as a sole trader;<br>• he/she meets requirements stipulated in applicable laws and regulations, other than the requirements listed above; in particular, he/she is not in breach of any restrictions or prohibitions on serving on the management bodies of commercial-law companies.<br><br>No person meeting any of the exclusion criteria specified on the Articles of Association may be considered as a candidate to the Management Board.<br><br>• The Management Board manages the Company and represents it before third parties.<br>• The Management Board's activities are managed by the President of the Management Board. President's specific powers are defined by the Rules of Procedure for the Management Board.<br>• If President of the Management Board is suspended from duties or removed from office, or his or her mandate otherwise expires before the end of the Management Board's term, until new President is appointed or incumbent President resumes his/her duties following suspension, all of President's powers, excluding the casting vote referred to in Article 9.5.2 of the Articles of Association, are exercised by a person appointed acting President of the Management Board pursuant to a Supervisory Board resolution.<br>• Meetings of the Management Board are held on an as-needed basis, but at least once every two weeks.<br>• The Management Board votes on resolutions at meetings or using means of remote communication.<br>• Management Board resolutions are adopted by a simple majority of votes (except for matters specified in the Rules of Procedure for the Management Board), and in the event of a voting tie, the President of the Management Board has the casting vote.<br>• For resolutions to be valid, all members of the Management Board must be notified of the content of the draft resolution and, in the case of resolutions adopted at a meeting, at least half of the Management Board members must be present. In the case of resolutions adopted using means of remote communication, all members of the |

| | Commercial Companies Code | Company documents | Articles of Association / Rules of Procedure | Operation; appointment and removal from office |
|---|---|---|---|---|
| | | | handling any activities related to customers' switching to a different electricity supplier where the transaction volume exceeds 300 GWh. | Management Board must cast their votes within the time limit set by the person conducting the vote.<br>• A Management Board meeting may be held without being formally convened, provided that all Management Board members are present and none of them objects to the holding of the meeting or to the proposed agenda.<br>• A Management Board member is required to inform the other Members of the Management Board of any conflicts of interest which have arisen or may arise, and to abstain from taking the floor when the matter which has given rise to the conflict is being discussed, and abstain from voting on the relevant resolution.<br><br>The Supervisory Board assesses any external professional engagements of Management Board members and decides whether to consent to their serving on the supervisory or management bodies of other entities and being compensated for such service. |

All of the corporate documents referred to above are available on the ORLEN website at https://www.orlen.pl/pl/o-firmie/o-spolce/organy-i-struktura-spolki/dokumenty-korporacyjne



Communication with the Company on matters concerning General Meetings:

- Contact form: https://www.orlen.pl/pl/relacje-inwestorskie/kontakt/kontakt-dla-akcjonariuszy



- Email: walne.zgromadzenie@orlen.pl
- The form and email may be used by the shareholders to communicate with the Company, in particular to submit notifications of the grant or revocation of powers of proxy, proxy instruments and requests relating to the General Meeting.

**The ORLEN S.A. General Meeting was held twice in 2025.**

The Annual General Meeting held on **5 June 2025** passed resolutions:

- to approve the Management Board's Report on the operations of ORLEN S.A. and the ORLEN Group, and the financial statements for 2024;
- to allocate the net profit for the financial year 2024 and to pay dividend for 2024 (PLN 6.00 per share);
- to approve the report of the ORLEN S.A. Supervisory Board on its activities for the financial year 2024;
- not to grant discharge to the following members of the ORLEN S.A. Management Board in respect of their service in 2024: Daniel Obajtek, Armen Artwich, Adam Burak, Michał Róg, Patrycja Klarecka, Jan Szewczak, Józef Węgrecki, Piotr Sabat, Krzysztof Nowicki, Iwona Waksmundzka - Olejniczak, Robert Perkowski;
- to grant discharge to the following members of the ORLEN S.A. Management Board in respect of their service in 2024: Ireneusz Fąfara, Witold Literacki, Magdalena Bartoś, Ireneusz Sitarski, Robert Soszyński, Marek Balawejder, Artur Osuchowski, Wiesław Prugar, Marcin Wasilewski, and to the following members of the Supervisory Board delegated to temporarily perform the duties of members of the Management Board in 2024: Kazimierz Mordaszewski, Ireneusz Sitarski, Tomasz Sójka, and Tomasz Zieliński;
- not to grant discharge to the following members of the ORLEN S.A. Supervisory Board in respect of their service in 2024: Wojciech Jasiński, Andrzej Szumański, Anna Wójcik, Barbara Jarzembowska, Andrzej Kapała, Roman Kusz, Jadwiga Lesisz, and Anna Sakowicz - Kacz;
- to grant discharge to the following members of the ORLEN S.A. Supervisory Board in respect of their service in 2024: Wojciech Popiołek, Michał Gajdus, Katarzyna Łobos, Ewa Gąsiorek, Kazimierz Mordaszewski, Mikołaj Pietrzak, Ireneusz Sitarski, Marian Sewerski, Ewa Sowińska, Tomasz Sójka, Piotr Wielowieyski, and Tomasz Zieliński;
- to endorse the Supervisory Board's report on remuneration of members of the Management Board and the Supervisory Board for 2024;
- to grant consent to the acquisition by the Company of 100% of shares in Energomedia Sp. z o.o. of Trzebinia;
- to appoint Supervisory Board members for a new term of office, ending upon the closing of the Annual General Meeting that approves the financial statements for 2027;
- to amend the rules for determining remuneration of members of the Company's Management Board and Supervisory Board.

The Extraordinary General Meeting held on **28 October 2025 and resumed after adjournment on 13 November 2025** passed resolutions:

- to amend the Company's Articles of Association and adopt the restated text of the Articles of Association – for details, see Section 7.3 of this Report;
- to pursue claims against former members of the ORLEN S.A. Management Board for redress of damage caused in connection with the management of the Company;
- to grant consent to the disposal of a registered branch operating as ORLEN Spółka Akcyjna – Oddział Laboratorium Pomiarowo Badawcze PGNiG of Warsaw to Polska Spółka Gazownictwa Sp. z o.o.;
- to determine the number of members of the Supervisory Board and appoint a new member to the Supervisory Board.

## Supervisory Board

| | |
|---|---|
|  | End of current term of office – upon the closing of the Annual General Meeting that approves the financial statements for 2027, i.e. no later than the end of June 2028 |
|  | As at 31 December 2025:<br>• 9 members of the Supervisory Board<br>• 7 members of the Supervisory Board met the independence criteria set out in the Company's Articles of Association |
|  | • Number of Supervisory Board meetings in 2025: 17<br>• Number of resolutions adopted by the Supervisory Board in 2025: 339<br>• Supervisory Board members' attendance at meetings: 97.05%<br>• All absences were authorised by the Supervisory Board. |

## Zarząd

| | |
|---|---|
|  | End of current term of office – upon the closing of the Annual General Meeting that approves the financial statements for 2025, i.e. no later than the end of June 2026 |
|  | As at 31 December 2025:<br>• 9 members of the Management Board<br>• Furthermore, Mr. Paweł Wojtunik was appointed in 2026 by the representative of the State Treasury, for the currently ongoing term of office, as a Member of the Management Board, effective as of 16 March 2026 |
|  | • Number of Management Board meetings in 2025: 76<br>• Number of resolutions adopted by the Management Board in 2025: 554<br>• Management Board members' attendance at meetings: 92.18% |

## 7.4 Management Board

Composition of the ORLEN S.A. Management Board as at the date of authorisation of this Report



**Ireneusz Fąfara**
President of the Management Board

Chief Executive Officer

**On the Management Board since 11 April 2024**

**Remit:**

- Strategy
- Oil Trading
- Innovation
- Corporate Governance
- HR
- Legal
- Governing Bodies Support
- Public and International Relations
- Corporate Communications
- Sponsorship
- Audit and Enterprise Risk Management

**Skills and educational background**

An expert in the fuel and energy sector, with several decades of experience managing large organisations and overseeing multi-billion projects. From 2010 to 2017, he worked for the ORLEN Group. As CEO of ORLEN Lietuva, he reformed and restored the profitability of the Group's Lithuanian refinery in Mažeikiai, and worked out agreements to settle years-long disputes over logistic issues. His other achievements included a significant increase in ORLEN Lietuva's export sales. He has expertise in various aspects specific to the ORLEN Group's business and processes.

Since the late 1990s, he has held top managerial positions at large companies, both public and private.

He served on the Supervisory Boards of Rockbridge TFI (2018–2024, resigned on the date of his appointment as President of the Management Board of ORLEN S.A.), PKO BP (2009–2010), LOTOS (2009–2010), Korporacja Ubezpieczeń Kredytów Eksportowych (2007–2009), Kompania Węglowa (2003–2005), National Health Fund (2005–2008), and Agencja Rynku Energii S.A. (1997–1998).

His credentials also include the roles of President of the Management Board of Bank Gospodarstwa Krajowego (2007–2009) and Vice President of the Management Board of the Polish Social Insurance Institution ZUS (1998–2007). Mr Fąfara is a graduate of the University of Economics in Kraków.



**Witold Literacki**
Vice President of the Management Board, Corporate Affairs, and First Deputy President of the Management Board

**On the Management Board since 6 February 2024**

**Remit:**

- Infrastructure and Information Security Oversight
- Regulations and Compliance
- Process Safety, Fire Safety and Occupational Health
- Procurement
- Environment

He performs the function of the head of an entrepreneur who is the head of an organizational unit within the meaning of the Act of 5 August 2010 on the Protection of Classified Information (Journal of Laws of 2024, item 632, as amended).

**Skills and educational background**

A finance and taxation expert with many years' experience in the fuel and energy sector, gained in a range of Polish and international companies. From 2022 to 2023, he served as Chief Financial Officer at PERN, where he was responsible for developing the company's financial strategy. Earlier, he headed the finance function at PZL-WZM. From 2008 to 2020, he was Head of the PKN ORLEN Tax Office, overseeing tax matters for all Group companies in Poland and abroad. Between 2011 and 2020, he sat on the Management Boards of ORLEN Finance and ORLEN Capital, ORLEN Group companies responsible for cash pooling and Eurobond issuance. His previous roles include Chief Tax Manager at RWE Stoen and Tax Controller at Carrefour Polska. He began his career as a Senior Inspector at the Zabrze Tax Office. Mr Literacki graduated from the University of Silesia, and completed an MBA programme at the Lublin School of Business.



**Sławomir Jędrzejczyk**
Vice President of the Management Board, Finance

**On the Management Board since 24 September 2025**

**Remit:**

- Finance
- Equity Investments
- Supply Chain Management
- Business Controlling
- Taxes
- Accounting and Financial Reporting
- Transformation of Financial Systems
- Investor Relations

**Skills and educational background**
An executive with nearly 30 years of experience acquired in companies listed on the Warsaw Stock Exchange. From 2008 to 2017, he served as Vice President of the Management Board, Chief Financial Officer of PKN ORLEN S.A., and held positions on the governing bodies of ORLEN Lietuva, Unipetrol a.s. and Orlen Upstream Canada. His scope of responsibility included delivery of value growth strategy, as well as finance, controlling, accounting, supply chain, investor relations, M&A and IT. From 2017 to 2025, he was active as a mentor, investor and independent member of supervisory boards. Earlier in his career, he was CEO of Emitel and held positions at Telekomunikacja Polska, ORFE, Impexmetal and Price Waterhouse. Mr Jędrzejczyk completed the Senior Executive Program at London Business School and is also a graduate of ACCA and Lodz University of Technology.



**Robert Soszyński**
Vice President of the Management Board, Chief Operating Officer

**On the Management Board since 1 May 2024**

**Remit:**

- Gas Trading
- Capital Investments
- Digital Transformation and IT
- Administrative Services

**Skills and educational background**
An executive with more than 30 years of experience in managing commercial-law companies, primarily in the energy sector. Previously, he held the positions of CEO of CIECH Service Sp. z o.o. (2008), CEO of PERN Przyjaźń S.A. (2008–2011), and Vice President of the Management Board of Polskie LNG S.A. (2015). From 2018 to 2021, he served as Deputy President of the City of Warsaw. He successfully coordinated a number of major investment projects, including the construction of a crude oil tank farm and strategic energy security projects related to the LNG terminal in Świnoujście. He is a graduate of the Warsaw University of Technology and completed an MBA at the University of Gdańsk. He serves on the Supervisory Boards of a number of companies, including Rockbridge TFI S.A., PAGED Energy S.A. and Koleje Mazowieckie. Mr Soszyński is qualified to serve on the Supervisory Boards of state-owned companies.



**Ireneusz Sitarski**
Vice President of the Management Board, Downstream

**On the Management Board since 16 May 2024**

**Remit:**

- Refining
- Petrochemical Production
- Refining Product Wholesale Trading
- Petrochemical Product Trading
- Logistics
- Maintenance operations as well as ensuring the technical efficiency and operational reliability of machines and equipment

**Skills and educational background**

Mr Sitarski holds a Master's degree in economics from the Faculty of Foreign Trade at the Higher School of Planning and Statistics (SGPiS), now the SGH Warsaw School of Economics. He is an economic adviser specialising in finance, corporate restructuring, mergers and acquisitions. He has extensive experience in advisory and privatisation projects, business valuation, and the restructuring of distressed loan portfolios. He formerly served as chief executive of the company managing the National Investment Fund, where he was responsible for restructuring projects and corporate acquisition and disposal transactions. In government administration, as Undersecretary of State from 1994 to 1996 and again from 2001 to 2003, he oversaw the transformation of state enterprises into commercial state-owned companies. He sat on the Management and Supervisory Boards of numerous companies, including NFI Foksal, Impexmetal, Telekomunikacja Polska, Giełda Papierów Wartościowych w Warszawie S.A. (Warsaw Stock Exchange), PTU, BGŻ, Dwory, Huta Aluminium Konin and PESA Bydgoszcz.



**Sławomir Staszak**
Member of the Management Board, Energy

**On the Management Board since 29 September 2025**

**Remit:**

- Power Generation
- Embedded Generation (since 1 January 2026)

**Skills and educational background**

An executive with long-standing experience in the energy sector. From 2024, he served on the Management Board of Energa S.A. and, as President, oversaw key energy transition projects, including the development of power distribution, renewable energy sources, gas-fired generating units and energy storage facilities. He also had an active role in the Energa Group as Chair of the Supervisory Board of Energa Operator and Deputy Chair of the Supervisory Board of Energa Obrót. He serves as Vice President of the Management Board of the Polish Electricity Association, and is involved in initiatives focused on strengthening the power sector's competitiveness and energy security. He regularly participates in industry debates, sits on conference programme committees, and works with the Gdańsk University of Technology as a business adviser. He is also actively engaged in ESG matters and took part in the COP29 World Climate Summit. Earlier in his career, he worked for companies in the energy and port sectors, led international teams and helped develop growth strategies. Mr Staszak graduated from the Faculty of Law at the University of Gdańsk.



**Wiesław Prugar**
Member of the Management Board, Upstream

**On the Management Board since 1 May 2024**

**Remit:**

- Upstream Area
- Upstream Operations Area
- Upstream Development
- Branches forming part of the ORLEN S.A. Upstream Poland Branches Group, as well as foreign branches of ORLEN Spółka Akcyjna, i.e. the PGNiG Operational Branch in Pakistan and the PGNiG Branch in Ras Al Khaimah in the United Arab Emirates – in liquidation

**Skills and educational background**
An energy industry expert with 40 years of experience. He graduated from the AGH University of Science and Technology in Kraków, where he earned an MSc in Engineering and a PhD degree. He began his career at the Oil and Gas Institute, working in research and engineering roles. He later moved to the private sector and gained management experience in services for the upstream industry. At PGNiG, he held a number of key positions, including Head of the Gas Sales and Marketing Division. From 2005 to 2017, he served as President of the Management Board of ORLEN Upstream. He served on the Supervisory Boards of a number of companies, including state-owned companies, and on the Board of Directors of the Energy & Geoscience Institute (EGI) at the University of Utah. He is an active member of industry organisations, including the World Petroleum Congress. Over the course of his career, he led numerous investment, acquisition and restructuring projects in the oil and gas sector. In recent years, he has also focused on the development of low-carbon and renewable energy sources.



**Marek Balawejder**
Member of the Management Board

**On the Management Board since 1 August 2024**

**Remit:**

- Sale of Fuels
- Non-fuel Sales
- Energy Transition, Consumers & Products
- Electric Mobility
- Commercial Marketing
- Retail Sales Management Process Support

**Skills and educational background**
An executive with 30 years of experience gained in Polish and international companies, including companies listed on the Warsaw Stock Exchange. He joined ORLEN in 2024, first as Member of the Management Board for Retail Sales. Then, since 2025, he has served as Member of the Management Board for Consumers & Products, with responsibility for integrating the service station business with the myORLEN and Energa Obrót offerings, as well as for developing a comprehensive multi-energy offer based on the Vitay platform. Earlier in his career, he held management positions at PepsiCo, Polkomtel, Raiffeisen and Action. From 2009 to 2016, he served as President of Orlen Gaz and Executive Director for Retail Sales at PKN ORLEN. Between 2017 and 2024, he worked as an investor and consultant, delivering projects for companies including Eurocash, Metro Group and Benefit Systems. Mr Balawejder is a graduate of the University of Physical Education in Warsaw, Kozminski University and the SGH Warsaw School of Economics, and has completed MBA and AMP programmes. He is currently continuing his executive education at IMD Business School.



**Marcin Wasilewski**
Member of the Management Board, Digital Transformation

**On the Management Board since 6 November 2024**

**Remit:**
- Technological Transition
- Downstream Development
- New Chemicals
- Biofuels and Hydrogen
- SMRs
- Sustainability and Energy Transition

He serves as the Climate Officer.

**Skills and educational background**
An executive with many years of experience in industry and the energy sector. From 2022 to 2024, he served as CEO of InnoEnergy Poland and as a member of the Executive Board of InnoEnergy SE. Earlier, from 2018 to 2022, he was Vice President of ABB Poland, exercising oversight over the power and industrial businesses in Poland, the Czech Republic and Hungary. Between 2006 and 2018, he held a number of roles within the ORLEN Group, including at ANWIL and Baltic Power, and served on the Supervisory Boards of a number of Group companies. He contributed to the ORLEN's energy strategy and was responsible for building the Group's energy segment, CCGT projects, and investments designed to align the Group's energy assets with EU requirements. He was also involved in the development of electricity trading and electric mobility infrastructure. Before that, he had an active role in integrating AB Mažeikių Nafta (now ORLEN Lietuva) into ORLEN Group structures and in implementing segment-based management, which remains the foundation of the Group's current management model. He is a member of the Polish Committee of the World Energy Council. Mr Wasilewski graduated from Florida Atlantic University and Warsaw University of Technology, holds an MBA from the University of Bradford, and completed the GMP at Harvard University.



**Paweł Wojtunik**
Member of the Management Board, Security and Risk Management

**On the Management Board since 16 March 2026**

**Remit:**
- Control and Security
- Risk Management

**Skills and educational background**
An expert in security and the management of institutions of strategic importance to the state. He has extensive experience in leading large organisations, conducting complex operations and managing teams effectively. He specialises in cooperation between public administration, state services and the financial sector.

From 2009 to 2015, he served as Head of the Central Anti-Corruption Bureau, overseeing key anti-corruption activities. Earlier in his career, he held senior positions in the Police and the Central Bureau of Investigation, and also gained international experience through his service at Scotland Yard in the United Kingdom.

In 2016, he advised the Prime Minister of Moldova as part of an EU mission supporting anti-corruption reforms. In 2024, he was appointed as Vice President of Kredobank in Ukraine. He is a graduate of the Faculty of Law at the University of Białystok and the Police Academy in Szczytno.

For information on the current division of powers and responsibilities between members of the Management Board, see the Company's website at https://www.orlen.pl/pl/o-firmie/o-spolce/organy-i-struktura-spolki/zarzad-spolki.

The following persons also served on the Company's Management Board in 2025:

- Magdalena Bartoś – removed from office by the Supervisory Board with effect at the end of the day on 27 August 2025;
- Artur Osuchowski – removed from office by the Supervisory Board with effect at the end of the day on 27 August 2025.

In 2026, Paweł Wojtunik was appointed as member of the Management Board:

- for the current term of office from 16 March 2026 – appointed by the Minister of State Assets on behalf of the State Treasury as the Company shareholder;
- for the next term of office beginning in the date of the Annual General Meeting that approves the financial statements for 2025 – appointed by the Supervisory Board.

The Management Board does not have any special powers to decide on the issuance or cancellation of Company shares other than powers provided for in the Commercial Companies Code. Decisions on the issuance or cancellation of Company shares are made, and the terms and conditions of such issuance or cancellation are defined, by way of a resolution of the General Meeting.

## 7.5 Supervisory Board

Composition of the ORLEN S.A. Supervisory Board as at 31 December 2025 and as at the date of authorisation of this Report



**Przemysław Ciszak**
Chair of the Supervisory Board

**On the Supervisory Board since 22 August 2025 Chair of the Supervisory Board since 28 October 2025**
**Member of the Supervisory Board from 22 August 2025 to 27 October 2025**

**Skills and educational background**
A graduate of the Faculty of Law at the Adam Mickiewicz University in Poznań. He also completed postgraduate studies in EU law at the University of Birmingham and in intellectual property law at the University of Warsaw, tax adviser training course, as well as numerous other courses in law and management. From 2002 to 2007, he worked at the Chancellery of the Prime Minister and the Government Legislation Centre, where he was involved in projects related to regional policy, transport and energy. Between 2008 and 2018, he headed the legal and corporate supervision functions at PKP CARGO S.A., PKP S.A. and Polska Grupa Zbrojeniowa S.A. Since 2018, he has run his own legal practice, and since 2025, he has served as Managing Director for Corporate Affairs at ARP S.A. Currently he is General Director at the Ministry of State Assets. Mr Ciszak specialises in market regulation, particularly in the areas of transport, energy sector and real estate. He also served as a member of the Higher Disciplinary Court of the National Chamber of Legal Advisers.



**Aleksander Kappes**
Deputy Chair
Independent Member of the Supervisory Board

**On the Supervisory Board since 13 November 2025**

**Skills and educational background**
Holder of a post-doctoral (habilitation) degree in law, professor at the University of Łódź, and Head of its Department of Commercial Law. He has pursued an academic career since 1990, specialising in civil, business and commercial law. He completed legal training as judge and attorney, and runs his own law practice, providing corporate advisory services. From 2011 to 2015, he was a member of the Company Law Team of the Codification Commission, and subsequently served as an expert for the Polish Parliament in connection with amendments to the Commercial Companies Code. He has authored around 80 publications, five monographs and more than 150 legal opinions prepared for public institutions. He is also an arbitrator at the arbitration courts of the Polish Chamber of Commerce and Polish Confederation of Private Employers Lewiatan, and has experience serving on the supervisory boards of companies, including state-owned companies.



**Katarzyna Łobos**
Secretary
Independent Member of the Supervisory Board

**On the Supervisory Board since 6 February 2024**

**Skills and educational background**
Ms Łobos holds a PhD in law and professional qualifications as a legal adviser. She graduated from the Faculty of Law and Administration at the Maria Curie-Skłodowska University in Lublin, and completed a postgraduate programme in company law at the University of Warsaw. She has experience in legal consulting and corporate legal advisory, gained during her tenure at a leading law firm, where she headed the Commercial Law Practice. She has authored numerous legal opinions in the fields of civil, administrative, business and commercial law. At Poland's supreme state audit institution, she worked as legal adviser and served as Acting Deputy Director of the Legal and Audit Decisions Department, where her responsibilities included reviewing objections to post-audit statements. As a member of the Audit Planning Group, she participated in the development of the strategic framework for the audit plan.



**Przemysław Baszak**
Independent Member of the Supervisory Board

**On the Supervisory Board since 13 November 2025**

**Skills and educational background**
Mr Baszak graduated from the Faculty of History at the Higher School of Pedagogy in Zielona Góra (now the University of Zielona Góra) in 1995 and completed postgraduate studies in forensic examination of documents at the University of Wrocław in 2000. He also completed an MBA at the SGH Warsaw School of Economics, as well as postgraduate programmes in internal audit and management control. From 1996 to 2014, he held senior positions in the Police and the Internal Security Agency (ABW), including as Adviser to the Head of the ABW. He served as Deputy Director of the Department of Security and Public Order at the Ministry of the Internal Affairs and Administration, Secretary of the Interministerial Team for Terrorist Threats, and director responsible for security at Polska Spółka Gazownictwa sp. z o.o. and Polska Wytwórnia Papierów Wartościowych S.A. From 2016 to 2020, he was President of the Management Board of TBU and a member of the Management Board of SOMNUS, and since 2018 he has run his own advisory practice in the field of security. He holds a PRINCE2 Foundation certificate and passed the examination for supervisory board members in 2015. He currently serves on the Supervisory Boards of PGZ S.A. and CENTROZŁOM Wrocław S.A.



**Ewa Gąsiorek**
Independent Member of the Supervisory Board

**On the Supervisory Board since 6 February 2024**

**Skills and educational background**
She holds a PhD in economics from the University of Economics in Katowice, and has completed studies in Management and Marketing and postgraduate studies in financial management. She is the author of numerous analyses on public finance, financial risk and budget planning, and has over 25 years of experience in managing the budgets of large public-sector entities. Since 2011, she has served as Deputy Director for Implementation of the Province of Warsaw's Budget at the Marshal's Office of the Province of Warsaw, where she oversees the budget, accounting and reporting, including the preparation of the consolidated balance sheet. She served on the Supervisory Boards of municipal companies and is currently a member of the Audit Committee of the Capital City of Warsaw.



**Marian Sewerski**
Independent Member of the Supervisory Board

**On the Supervisory Board since 24 July 2024**

**Skills and educational background**
He graduated from the Academy of Economics in Krakow (currently University of Economics), having completed a master's degree programme in Construction Economics. He began his career at companies of the Polish Motor Association, where he served on Management and Supervisory Boards. He then spent 23 years with Texaco and Chevron, holding management positions in their Polish operations. Between 1994 and 2000, he was involved in the expansion of the Texaco service station network, headed Texaco Lubricants Polska, and served as Sales Manager for Chevron Central Europe for Poland, the Czech Republic and Romania. From 2010 to 2015, he worked at Chevron Polska Energy Resources on shale gas exploration projects. He has extensive experience in combining international corporate standards with Polish regulatory requirements, as well as expertise in HR. For more than 20 years, he served on the Management Board of the Czytelnik Publishing Cooperative, including as President of the Management Board from 2017. He also held positions of President of the Board of the Polish Organisation of Oil Industry and Trade, and member of the Supervisory Boards of Polish Radio and CIECH S.A.



**Ewa Sowińska**
Independent Member of the Supervisory Board

**On the Supervisory Board since 2 December 2024**

**Skills and educational background**
Graduate of the Faculty of Economics at the University of Gdańsk and a qualified statutory auditor. She has worked with audit firms for 30 years and has been a Partner at ESO Audit since 2009. Earlier in her career, she served as Director of PwC's Gdańsk office and as a Member of the Management Board of PwC. She was actively involved in the Polish Chamber of Auditors (PIBR) for 12 years, serving as its Vice-President from 2015 to 2019. She also chaired PIBR's Training Committee and coordinated work on sustainability reporting. She completed postgraduate studies at SWPS University and is also active as a business coach. She serves on the Management Board of the Responsible Business Forum (FOB) and is a member of the Association of Independent Non-Executive Directors. She authored and mentors the #ESG in Practice postgraduate programme at the Sopot University of Applied Sciences (SANS). An expert in sustainability, she lectures at university level on business ethics and sustainability reporting. She also serves on the programme boards of the Open Eyes Economy Summit (OEES), the ESG Compass Conference, the Best Sustainability Reports Competition run by FOB, and the Business Poland World Congress. She is Programme Director of PIBR's #TOGETHERforESG educational campaign, an Ambassador of 30% Club Poland, an expert in the Climate Leadership programme, and a jury member for the ESG Eagles competition and the CFO Excellence Awards, organised by the Rzeczpospolita daily. She is a recipient of the International Education and Business Award: Archipelagos of Relations 2019 #THINK #ENGAGE #ACT, and of the Responsible Business Forum's People Who Change Business award.



**Piotr Wielowieyski**
Independent Member of the Supervisory Board

**On the Supervisory Board from 25 April to 24 June 2024 and since 24 July 2024**

**Skills and educational background**
A professional with a wealth of expertise spanning the fuel and energy sector, as well as economic consulting. From 2008 to 2016, he was associated with the ORLEN Group, serving on the Management Board of Unipetrol and the Supervisory Board of ORLEN S.A. Earlier in his career, he held the positions of President and member of the Management Board at Warsaw Stock Exchange-listed companies: Zachodni Fundusz Inwestycyjny and Foksal NFI. He also served as member of the Supervisory Boards of ANWIL, BOP, ZM Ropczyce, and Libella. In the 1990s, he worked at the representative office of the International Finance Corporation (World Bank), where he contributed to projects in Poland.

He graduated from the Faculty of Economic Sciences at the University of Warsaw, passed the state exam for candidates for supervisory board members at state-owned enterprises, and completed studies for investment advisors and securities analysts at Centrum Prywatyzacji BiF.



**Tomasz Zieliński**

Member of the Supervisory Board

**On the Supervisory Board since 6 February 2024**

**Skills and educational background**

He holds a PhD in technical sciences, awarded in 2003, and completed an MBA at the University of Illinois in 2009. He also completed executive programmes at Harvard Extension School and Stanford University. Since 2013, he has served as President of the Board of the Polish Chamber of Chemical Industry. He has more than 23 years of experience in the chemical, refining and petrochemical sectors, including at ORLEN S.A., ANWIL S.A., Grupa Azoty Police, Chemeko and ORLEN Unipetrol. He also pursued academic work at the Warsaw University of Technology and Prof. I. Mościcki Institute of Industrial Chemistry. He has served on the governing bodies of Fertilizers Europe and the World Refining Association, as well as on parliamentary working groups. Since 2016, he has represented Central European countries in CEFIC (NAB) and the European Chemical Employers Group (ECEG). He is a member of numerous expert bodies, including the Polish Academy of Sciences, the Polish Chamber of Commerce and institutes of the Łukasiewicz Research Network..

The new term of office of the Supervisory Board commenced on 5 June 2025, when the ORLEN S.A. Annual General Meeting appointed the following persons to the Company's Supervisory Board:

- **Wojciech Popiołek** – Chair of the Supervisory Board,
- **Michał Gajdus** – Member of the Supervisory Board,
- **Katarzyna Łobos** - Member of the Supervisory Board,
- **Ewa Gąsiorek** – Member of the Supervisory Board,
- **Kazimierz Mordaszewski** – Member of the Supervisory Board,
- **Tomasz Zieliński** – Member of the Supervisory Board,
- **Mikołaj Pietrzak** – Member of the Supervisory Board,
- **Piotr Wielowieyski** – Member of the Supervisory Board,
- **Marian Sewerski** – Member of the Supervisory Board,
- **Ewa Sowińska** – Member of the Supervisory Board.,

The appointment and termination dates of Supervisory Board members were as follows:

- Wojciech Popiołek, Michał Gajdus and Kazimierz Mordaszewski were appointed by the Extraordinary General Meeting on 6 February 2024, and removed from office by the Extraordinary General Meeting on 28 October 2025;
- Mikołaj Pietrzak was appointed by the Extraordinary General Meeting on 6 February 2024 and resigned on 29 October 2025 with immediate effect;
- Przemysław Ciszak was appointed as Chair of the Supervisory Board by the Extraordinary General Meeting on 28 October 2025;
- Aleksander Kappes and Przemysław Baszak were appointed by the Extraordinary General Meeting on 13 November 2025.

## Committees of the Supervisory Board

- The Supervisory Board may appoint standing or ad-hoc committees, which act as its collective advisory and opinion making bodies.
- The following standing committees operate within the Supervisory Board:
  - Audit Committee, which is responsible for advising the Supervisory Board on the proper implementation of the Company's budget and financial reporting, internal controls in place at the Company and across the ORLEN Group, collaboration with the Company's auditors, and management of internal audit.
  - Strategy and Development Committee, whose primary role is to provide the Supervisory Board with opinions and recommendations on any planned investments and divestments with a potentially material effect on the Company, as well as opinions on the Company's growth strategy, strategic documents, and documents concerning material assets of the Company.
  - Nomination and Remuneration Committee, which supports the Company's attainment of strategic goals by providing the Supervisory Board with opinions and proposals on how to shape the Company's management structure, including organisational solutions, remuneration schemes, and recruitment procedures to ensure selection of personnel with appropriate qualifications to contribute to the Company's success.
  - Corporate Governance Committee, which assesses the implementation of corporate governance standards at the Company, submits recommendations to the Supervisory Board regarding adoption of corporate governance standards, and monitors the Company's management in terms or legal and regulatory compliance.
  - Sustainability Committee (the Social and Environmental Responsibility Committee until 25 March 2025), with the mandate to advise the Supervisory Board on matters related to the planning and formulation of a sustainable development strategy, sustainability reporting, and

cooperation with the audit firm engaged to provide assurance of sustainability reporting. The Committee also monitors climate risks and opportunities in accordance with the ORLEN Group Climate Policy and the associated decarbonisation strategy, and supervises the Group's compliance with the ORLEN Group Code of Ethics, the Human Rights Policy and Diversity Policy and also assesses the justification of expenditure on donations incurred by the Company and its Capital Group.

- The Sponsorship Committee (the Sports Sponsorship Committee until 30 July 2025), responsible for the monitoring of the Company's social sponsorship activities and providing the Supervisory Board with recommendations regarding assessment of the appropriateness of the Company's and the Group's expenditures on social and sports sponsorship.
- Security Committee, whose role is to oversee the Company's key activities in the areas of economic security, energy security, infrastructure and information security, cybersecurity, and physical security. It also supervises the crisis management system..

Table 131 Activity of the Supervisory Board committees in 2025

| Committee | Number of minuted meetings | Number of resolutions passed |
|---|---|---|
| Audit Committee | 14 | 8 |
| Strategy and Development Committee | 10 | 1 |
| Nomination and Remuneration Committee | 11 | 3 |
| Corporate Governance Committee | 9 | 2 |
| Sustainability Committee (Social and Environmental Responsibility Committee until 26 March 2025) | 11 | 6 |
| Sponsorship Committee (Sports Sponsorship Committee until 30 July 2025) | 9 | 2 |
| Security Committee | 8 | 2 |

## Composition of the ORLEN S.A. Supervisory Board Committees

Table 132 Composition of the ORLEN S.A. Supervisory Board Committees from 1 January to 31 December 2025 and as at the date of authorisation of this Report

| Full name | Position held on Supervisory Board Committee | Independence status |
|---|---|---|
| | **Audit Committee** | |
| Ewa Gąsiorek | Committee Chair | yes |
| Katarzyna Łobos | Committee Member | yes |
| Mikołaj Pietrzak | Committee Member<br>until 29 October 2025 | yes |
| Ewa Sowińska | Committee Member | yes |
| Piotr Wielowieyski | Committee Member | yes |
| | **Strategy and Development Committee** | |
| Tomasz Zieliński | Committee Chair | |
| Wojciech Popiołek | Committee Member<br>until 28 October 2025 | yes |
| Kazimierz Mordaszewski | Committee Member<br>until 28 October 2025 | |
| Ewa Sowińska | Committee Member | yes |
| Przemyslaw Ciszak | Committee Member<br>from 27 August to 27 October 2025 | |
| | **Nomination and Remuneration Committee** | |
| Michał Gajdus | Committee Chair<br>until 28 October 2025 | yes |
| Przemyslaw Ciszak | Committee Chair<br>since 25 November 2025, Committee Member<br>since 18 November 2025 | |
| Aleksander Kappes | Committee Member<br>since 18 November 2025 | yes |
| Katarzyna Łobos | Committee Member | yes |
| Mikołaj Pietrzak | Committee Member | yes |

| Full name | Position held on Supervisory Board Committee | Independence status |
|---|---|---|
| | until 29 October 2025 | |
| Marian Sewerski | Committee Member | yes |
| | **Corporate Governance Committee** | |
| Wojciech Popiołek | Committee Chair<br>until 28 October 2025 | yes |
| Aleksander Kappes | Committee Chair<br>since 29 November 2025<br>Committee Member<br>since 18 November 2025 | yes |
| Przemysław Baszak | Committee Member<br>since 18 November 2025 | yes |
| Ewa Gąsiorek | Committee Member | yes |
| Michał Gajdus | Committee Member<br>until 28 October 2025 | yes |
| Marian Sewerski | Committee Member | yes |
| Przemyslaw Ciszak | Committee Member<br>from 27 August to 27 October 2025 | |
| | **Sustainability Committee (Social and Environmental Responsibility Committee until 25 March 2025)** | |
| Mikołaj Pietrzak | Committee Chair<br>until 29 October 2025 | yes |
| Ewa Sowińska | Committee Chair<br>since 25 November 2025<br>Committee Member<br>until 25 November 2025 | yes |
| Piotr Wielowieyski | Committee Member | yes |
| Tomasz Zieliński | Committee Member | |
| | **Sponsorship Committee (Sports Sponsorship Committee until 30 July 2025)** | |
| Michał Gajdus | Committee Chair<br>until 28 October 2025 | yes |
| Przemyslaw Ciszak | Committee Chair | |

| Full name | Position held on Supervisory Board Committee | Independence status |
|---|---|---|
| | since 25 November 2025<br>Committee Member<br>from 27 August to 27 October 2025 and since 18 November 2025 | |
| Aleksander Kappes | Committee Member<br>since 18 November 2025 | yes |
| Przemysław Baszak | Committee Member<br>since 18 November 2025 | yes |
| Wojciech Popiołek | Committee Member<br>until 28 October 2025 | |
| Kazimierz Mordaszewski | Committee Member<br>until 28 October 2025 | |
| Tomasz Zieliński | Committee Member | |
| | **Security Committee** | |
| Kazimierz Mordaszewski | Committee Chair<br>until 28 October 2025 | |
| Przemysław Baszak | Committee Chair<br>since 25 November 2025<br>Committee Member<br>since 18 November 2025 | yes |
| Ewa Gąsiorek | Committee Member | yes |
| Katarzyna Łobos | Committee Member | yes |

## Audit Committee

- The Audit Committee meets at least once per quarter, prior to the publication of the Company's financial statements.
- For a description of the educational background and professional experience of the members of the Supervisory Board, see Section 7.5 of this Report.
- All the applicable requirements on the qualifications of Audit Committee members, as mandated by law or stipulated in the Company's by-laws and internal policies, are satisfied.

Table 133 Composition of the Audit Committee as at 31 December 2025 and as at the date of authorisation of this Report

| Member of the Supervisory Board | Date of appointment to | | Member of the Audit Committee | | |
|---|---|---|---|---|---|
| | the Supervisory Board | the Audit Committee | meets the independence criteria under the Statutory Auditors Act | has expertise and skills in accounting or financial auditing | has expertise and skills relevant to the Company's industry |
| Ewa Gąsiorek | 6 February 2024<br>5 June 2025 | 6 February 2024<br>9 June 2025 | yes | yes | yes |
| Katarzyna Łobos | 6 February 2024<br>5 June 2025 | 16 February 2024<br>9 June 2025 | yes | yes | yes |
| Ewa Sowińska | 2 December 2024<br>5 June 2025 | 5 December 2024<br>9 June 2025 | yes | yes | no |
| Piotr Wielowieyski | 25 April 2024 (until 24 June 2024)<br>24 July 2024<br>5 June 2025 | 14 May 2024<br>31 July 2024<br>9 June 2025 | yes | yes | yes |

In 2025, the Audit Committee held 14 meetings and passed 8 resolutions.

In the exercise if its functions, the Audit Committee:

- adopted and submitted to the Supervisory Board for approval the updated policy and procedure for selecting the audit firm, non-audit services policy, and the procedure for monitoring and overseeing auditor independence;
- controlled and monitored independence of the statutory auditor and the audit firm, particularly in cases where the audit firm provides non-audit and non-sustainability assurance services to the Company;
- reviewed the Company's interim and full-year financial statements (both separate and consolidated), and Management Board's Reports on the Company's operations;
- discussed any issues or qualifications raised during the audit of financial statements;
- gave opinion on the Management Board's recommendation on the allocation of the 2024 net profit and dividend amount to be paid in 2025;
- assessed the Company's standing on a consolidated basis, including the performance of its internal control, risk management, and compliance systems and internal audit function in 2024;
- assessed the Company's utilisation of non-current assets;
- reviewed and assessed the performance of the ORLEN Group companies as part of the assessment of the Group's consolidated financial statements;
- reviewed the annual internal audit plan, including the allocated budget and the human and technological resources involved, and reviewed reports on internal audit activities;
- discussed reports from audits carried out by the Internal Control Office;
- monitored the implementation of recommendations issued by the Audit Office and the Internal Control Office;
- reviewed material transactions with related parties and prepared recommendations for the Supervisory Board regarding their assessment.

All members of the Audit Committee were present at 13 out of its 14 meetings. One member of the Audit Committee was absent from one meeting.

Sustainability Committee

- For a description of the educational background and professional experience of the members of the committee, see Section 7.5 of this Report.
- All the applicable requirements on the qualifications of Sustainability Committee members, as mandated by law or stipulated in the Company's by-laws and internal policies, are satisfied..

Table 129 Composition of the Sustainability Committee as at 31 December 2025 and as at the date of authorisation of this Report

| Member of the Supervisory Board | Date of appointment to | | Member of the Sustainability Committee | | |
|---|---|---|---|---|---|
| | the Supervisory Board | the Sustainability Committee: | meets the independence criteria under the Statutory Auditors Act | has expertise and skills in accounting or financial auditing | has expertise and skills relevant to the Company's industry |
| Ewa Sowińska | 2 December 2024<br>5 June 2025 | 5 December 2024<br>9 June 2025 | yes | yes | no |
| Piotr Wielowieyski | 25 April 2024 (until 24 June 2024)<br>24 July 2024<br>5 June 2025 | 14 May 2024<br>31 July 2024<br>9 June 2025 | yes | yes | yes |
| Tomasz Zieliński | 6 February 2024<br>5 June 2025 | 6 February 2024<br>9 June 2025 | no | no | yes |

In 2025, the Sustainability Committee held 11 meetings and passed 6 resolutions.

In the exercise of its functions, in 2025 the Sustainability Committee:

- adopted and submitted to the Supervisory Board for approval the policy and procedure for selecting the audit firm, and the procedure for monitoring and overseeing auditor independence in connection with the assurance of the ORLEN Group's sustainability reporting;
- completed the procedure to select the audit firm to provide assurance the ORLEN Group's sustainability reporting and prepared the relevant recommendation for the Supervisory Board;
- gave opinion on the ORLEN Group Sustainable Development Strategy for 2025–2035 and prepared a recommendation for the Supervisory Board regarding its adoption;
- gave opinion on the Sustainability Statement for 2024 and prepared a recommendation for the Supervisory Board regarding its adoption;
- reviewed information on the activities and expenses of the sponsorship area and the ORLEN Group Charitable Policy for 2024;
- reviewed information on the progress of the ORLEN Group Sustainable Development Strategy;
- reviewed the updated ORLEN Group Climate Policy and discussed the implementation status of activities undertaken on its basis;
- discussed information on the ORLEN Transition Plan;
- reviewed the report on the implementation of the ORLEN Group Charitable Policy for the first half of 2025;
- reviewed information on the activities of the Ethics Team for the second half of 2024 and the first half of 2025;
- discussed the state of preparations for the assurance of sustainability reporting, including cooperation with the auditor;
- discussed the implementation of an internal audit project relating to sustainability reporting procedures.

All members of the Sustainability Committee were present at all meetings.

## 7.6 Audit firm auditing financial statements

- The Company has in place a policy and detailed procedure for selecting the audit firm to audit and review ORLEN S.A.'s financial statements.
- The Supervisory Board selects an audit firm based on the recommendation of the Audit Committee.
- The Audit Committee's recommendation must include a justification of the Committee's choice. It must present at least two potential audit firms for selection, indicating a clear, reasoned preference for one. The recommendation also takes into account any relevant findings or guidance from the annual report of the Polish Audit Oversight Agency that might affect the selection process.
- The Audit Committee presents the recommendation after conducting a selection procedure for an audit firm to audit and review ORLEN S.A.'s financial statements; it also prepares a report summarising the selection process.
- The process of selecting the audit firm to audit and review financial statements should allow sufficient time for the auditor to participate in the annual inventory of significant assets, except in cases where a new audit firm must be urgently selected due to the previous one losing its licence to conduct such audits.
- The initial contract with an audit firm for financial statement audits and reviews must not be for a period shorter than two years, with an option to extend it for additional two-year periods upon approval by the Supervisory Board. The maximum duration of uninterrupted audit and review engagements conducted by the same audit firm cannot exceed ten years.
- The same lead auditor may not conduct the audits and reviews of ORLEN S.A.'s financial statements for more than five consecutive years. The lead auditor may resume audit activities at

ORLEN S.A. after a hiatus of at least three years following the conclusion of their last audit and review.

- The contract with the audit firm is executed by the Management Board on the terms approved by the Supervisory Board. In instances where adjustments to the audit scope are necessary, especially due to an increased workload, or where a change in the Auditor's fee is required, the decision whether to consent to such modifications lies with the Supervisory Board and is subject to the Audit Committee's prior recommendation. If consent is granted, the Management Board then executes an amendment to the contract with the audit firm on the terms agreed on by the Supervisory Board.
- If a decision is made to continue the existing engagement and extend the contract with the audit firm for subsequent periods, the Audit Committee presents an appropriate recommendation to the Supervisory Board. The final decision to extend the contract is made by the Supervisory Board upon recommendation of the Audit Committee.
- To optimise the process and costs of conducting audits of financial statements of the key ORLEN Group companies, it is recommended that they be audited by the same audit firm as the one conducting the audit of ORLEN S.A.'s financial statements.
- In accordance with the policy on engaging the audit firm authorised to audit and review the Company's financial statements (or its affiliates) to provide non-audit services, as adopted by the Supervisory Board, the provision of permitted non-audit services by the audit firm is approved by the Audit Committee on a case by cases, following an assessment of the auditor's independence.
- The auditor conducts audits and reviews of the Company's separate and consolidated financial statements as follows:
  - interim reports for the first and third quarters, as well as the half-year report, undergo review;
  - full-year financial statements are audited;
  - an audit of full-year financial statements includes an audit of the utilisation of state aid funds, if the Company received any such funds in the reporting period.

In accordance with the Company's policy and procedure for selecting the audit firm, on 29 October 2024, the Supervisory Board selected KPMG Audyt Spółka z ograniczoną odpowiedzialnością spółka komandytowa to conduct:

- audits of the separate financial statements of ORLEN S.A. and consolidated financial statements of the ORLEN Group for 2025 and 2026; and
- reviews of the condensed interim separate financial statements of ORLEN S.A. and condensed interim consolidated financial statements of the ORLEN Group for the first and third quarters and the first half of 2025 and 2026.

In 2025, KPMG Audyt spółka z ograniczoną odpowiedzialnością sp.k. and its affiliates provided permitted assurance and related non-audit services to ORLEN S.A. and certain other ORLEN Group companies, including:

- the performance of agreed-upon procedures in respect of the achievement of quantitative MBO targets for individual members of the Company's Management Board for 2024;
- a limited assurance engagement covering quantitative information (KPIs) published by ORLEN in the 2024 Allocation and Impact Report, prepared in fulfilment of the Company's commitment to annual reporting in connection with the green bonds issued in 2021, as set out in Section 6 of the PKN ORLEN S.A. Green Finance Framework;
- services related to the revision of the Global Medium Term Note Programme (the "GMTN Programme"), issuance of Comfort Letters related to the planned issue of Eurobonds under the GMTN Programme, and other activities necessary to revise the GMTN Programme and effect the planned issue.

Furthermore, in 2025, Forvis Mazars Sp. z o.o. assessed the annual report on remuneration of members of the ORLEN S.A. Management Board and Supervisory Board for 2024.

In accordance with the policy on engaging the audit firm authorised to audit and review the Company's financial statements (or its affiliates) to provide non-audit services, the Audit Committee approved the provision of permitted non-audit services by KPMG Audyt Spółka z ograniczoną odpowiedzialnością spółka komandytowa.

The Audit Committee assessed the independence of both audit firms, namely KPMG Audyt Spółka z ograniczoną odpowiedzialnością spółka komandytowa and Forvis Mazars Sp. z o.o. Before granting its approval in each case, it reviewed the auditor's statement confirming that the relevant service was not a prohibited service and that its provision would not pose a threat to the independence of the audit firm or the lead auditor acting on its behalf in the audit of ORLEN S.A.'s financial statements and the ORLEN Group's consolidated financial statements for 2025.

## 7.7 Audit firm providing assurance of sustainability reporting

- The Company has in place a policy and a detailed procedure for selecting the audit firm to provide assurance of sustainability reporting.
- The Company's Supervisory Board selects the audit firm to provide assurance of sustainability reporting on the basis of a recommendation from the Supervisory Board's Sustainability Committee.
- The Committee's recommendation must include a justification of the Committee's choice. It must present at least two potential audit firms for selection, indicating a clear, reasoned preference for

one. The recommendation also takes into account any relevant findings or guidance from the annual report of the Polish Audit Oversight Agency that might affect the selection process.
- The Sustainability Committee submits its recommendation after conducting the audit firm selection procedure; it also prepares a report summarising the selection process.
- The contract with the audit firm is executed by the Management Board on the terms approved by the Supervisory Board.
- In accordance with the Company's policy and procedure for selecting the audit firm to provide assurance of sustainability reporting, on 29 October 2025 the ORLEN S.A. Supervisory Board selected KPMG Audyt Spółka z ograniczoną odpowiedzialnością spółka komandytowa to provide assurance of sustainability reporting for the financial years ending on 31 December 2025 and 31 December 2026.

## 7.8 Diversity policy

In 2021, ORLEN S.A. introduced a Diversity Policy, an internal document setting out activities undertaken to promote diversity, ensure equal opportunities, prevent discrimination and promote diversity management and inclusiveness in the workplace. Since 2023, the document has been implemented at other ORLEN Group companies. but there is no formal policy in place that would specifically address the question of diversity among Management or Supervisory Board members.

The Company annually discloses diversity metrics for ORLEN's supervisory and management bodies. The Company's diversity management does not include observing a specific gender diversity ratio. As at 31 December 2025 and as at the date of authorisation of this Report, the Best Practice 2021 gender diversity requirement, whereby the minority group should have at least 30% representation on both Supervisory and Management Board, was met at the Supervisory Board but not at the Management Board.

Members of the Management Board and the Supervisory Board appointed to their respective positions possess high-level qualifications and professional experience. The current membership of the Management Board and Supervisory Board guarantees versatility and diversity of these governing bodies, including in terms of education, gender and professional background. The Management Board is composed of individuals who possess the requisite knowledge and competencies in managing complex corporate structures, as well as in the fields of law, accounting, and the fuel and energy sector. Members of the Supervisory Board are individuals with extensive experience in supervising companies, expertise in law and accounting, and knowledge of the sector in which the Company operates.

In order to implement the objectives of Directive (EU) 2022/2381 of the European Parliament and of the Council, the Company is in the process of developing a document with guiding principles for nominating candidates to the Company's governing bodies, as well as the rules governing the selection process for specific positions on those bodies, with a view to achieving balanced gender representation and thereby enhancing the Company's effectiveness and capacity for innovation.

A key priority is to develop and formally adopt this framework with care and diligence, ensuring it sets clear standards for gender representation in line with the Directive, and helps increase the presence of underrepresented groups at the Supervisory and Management Board level.

ORLEN is also a signatory of the Diversity Charter, an international initiative under the patronage of the European Commission, present in 26 EU countries and aiming to promote equality and diversity management in the workplace. By signing the Charter, ORLEN has pledged to prohibit any form of discrimination in the workplace and to actively work towards creating and promoting diversity. It also demonstrates the Company's willingness to engage all employees and partners in these endeavours. Subscribing to the Diversity Charter is one of many steps ORLEN has taken as part of its broader sustainability agenda.

ORLEN is committed to fostering an environment conducive to the development of women. In March 2025, the Company launched the Women Forward programme, designed to create opportunities and resources for women to gain managerial and leadership experience and prepare for managerial and leadership roles, including in top management. The programme focuses on advancing equality and diversity at every career level, building competencies in key strategic areas for the Company, and increasing the number of women in managerial and strategic roles. It also includes initiatives to create a strong community of women within the organisation.

Table 134 Diversity of the Management Board and Supervisory Board as at the date the Report was approved

| | Management Board | | Supervisory Board | |
|---|---|---|---|---|
| | Number of persons | Diversity ratio* | Number of persons | Diversity ratio* |
| | - structure by gender | | | |
| women | 0 | 0% | 3 | 33.3% |
| men | 10 | 100% | 6 | 66.7% |
| | - structure by age group | | | |
| 36 – 45 years | 1 | 10.0% | 0 | 0% |
| 46 – 55 years | 2 | 20.0% | 5 | 55.6% |
| 56 – 65 years | 5 | 50.0% | 2 | 22.2% |
| 66 years and more | 2 | 20.0% | 2 | 22.2% |

* Calculated as share of the total number of members.

# 8. Other information on the ORLEN Group

## 8.1 Material agreements, transactions and court proceedings at the ORLEN Group

### Agreements material to the ORLEN Group's operations

On 18 December 2025, ORLEN signed an agreement with Synthos S.A. to acquire 100% of shares in S54 sp. z o.o., which is constructing a new butadiene production unit (NBU) at the production plant in Płock. The transaction is valued at PLN 692 million, with final settlement expected by the end of June 2026. The NBU unit will form an integral part of the Płock production plant. It will receive the entire C4 fraction from the New Chemicals project and will deliver butadiene and raffinate-1, used in the ether production process. As a result of the transaction, ORLEN will extend the petrochemical value chain in Płock.

For more information, see Current Report No. 69/2025 of 18 December 2025.

### Material related-party transactions

A summary of material transactions (above PLN 1,000 million) entered into between the Parent and its related parties in 2025 is presented in the table below.

Table 135 Material intra-Group transactions in 2025 [PLN million]

| Party | Sales by the Parent | Party | Purchases by the Parent |
|---|---|---|---|
| ORLEN Paliwa Sp. z o.o. | 24,932 | ORLEN Energy Trading GmbH | 14,180 |
| ORLEN Lietuva A.B. | 18,699 | ORLEN LNG TRADING LIMITED | 6,464 |
| ORLEN Unipetrol RPA s.r.o. | 14,328 | ORLEN Lietuva A.B. | 2,387 |
| ORLEN Energia Sp. z o.o. | 6,405 | Orlen Południe S.A. | 2,295 |
| BOP Sp. z o.o. | 2,355 | Rafineria Gdańska Sp. z o.o. | 2,124 |
| ORLEN Trading Switzerland GmbH | 2,336 | ORLEN Energia Sp. z o.o. | 2,025 |
| ORLEN Energy Trading GmbH | 1,769 | ORLEN Unipetrol RPA s.r.o. | 1,899 |
| ORLEN Termika S.A. | 1,601 | ORLEN Termika S.A. | 1,808 |
| myORLEN sp. z o.o. | 1,592 | ORLEN Paliwa Sp. z o.o. | 1,664 |
| Anwil S.A. | 1,224 | ORLEN Trading Switzerland GmbH | 1,112 |
| Orlen Asfalt Sp. z o.o. | 1,214 | | |
| ORLEN OIL Sp. z o.o. | 1,135 | | |

### Legal proceedings

A summary of material proceedings (exceeding PLN 100 million) in which the Parent Company or a related entity was a party in 2025 is presented in the table below.

Contingent liabilities

Table 136 Material court, arbitration and administrative proceedings in which ORLEN Group companies act as defendants [PLN million]

| Case description | Amount in dispute [PLN million] |
|---|---|
| **ORLEN Upstream Norway AS vs Tax Authority (initiated proceedings 20 October 2015- 12 September 2023)**<br>Cases at the administrative proceedings stage: dispute concerning the historical thin capitalisation of LEPN, and dispute concerning the deductibility of the cost of sales for gas. | 112 (NOK 314 million) |
| **Qemetica Silicates S.A. vs ORLEN, myORLEN Sp. z o.o. (initiated proceedings 26 August 2025)**<br>The case concerns a claim for damages brought by Qemetica Silicates S.A. for the alleged abuse of a dominant position by ORLEN S.A. and PGNiG Obrót Detaliczny Sp. z o.o.<br>ORLEN S.A. submitted its defence, considering the claim to be unfounded. | 323 |
| **ORLEN Group companies vs land owners (initiated proceedings 2013-2025)**<br>Unauthorised use of land (the Group companies do not have title to certain plots of land on which, among other things, their energy and gas infrastructure is located).<br>The Group maintains ongoing assessment of claim validity and quantum, analyses provision requirements, and creates provisions for the court disputes. In view of the judgment delivered by the Polish Constitutional Tribunal on 2 December 2025 concerning prescriptive land easements corresponding to transmission easements (P 10/16), the Group considers that the short-term risk of incurring material costs in this respect is low. | 471 |
| **President of the Polish Energy Regulatory Office (URE) vs Energa Obrót S.A. (initiated proceedings 5 February 2026)**<br>Administrative proceedings concerning the issuance of a decision requiring Energa Obrót S.A. to transfer to the Price Difference Compensation Fund an amount equal to the difference between the contribution to the Price Difference Compensation Fund assessed by the President of the URE and the contribution to the Fund reported by the subsidiary in its reports for the twelve-month period from December 2022 to December 2023, submitted to the President of the URE.<br>On 12 March 2026, Energa Obrót received an administrative decision from the President of the Energy Regulatory Office requiring the company to transfer PLN 550.9 million to the Price Difference Compensation Fund within 30 days from the decision delivery date, together with statutory interest accrued from the decision receipt date. | 551 |

## 8.2 Events after the reporting date

- 11 February 2026 ORLEN Upstream Norway's acquisition of an interest in the Aphrodite gas field on the Norwegian Continental Shelf, with reserves estimated at 7.5 bcm, of which approximately 1.9 bcm are attributable to ORLEN
- 25 February 2026 Appointment of Paweł Wojtunik as Member of the Management Board for Security and Risk Management
- 12 March 2026 Revision of the offer to purchase all shares in Grupa Azoty Polyolefins for PLN 1.14 billion
- 13 March 2026 Execution of bond issue documentation for an additional issue of the second tranche of Series C bonds worth USD 250 million
- 17 March 2026 Admission of an additional issue of Series C GMTN bonds to trading on the regulated market operated by Euronext Dublin
- 31 March 2026 Execution of a preliminary agreement for the acquisition of all shares in Grupa Azoty Polyolefins and the provision of financing necessary to complete the company's restructuring, with a total value of PLN 1.35 billion
- 15 April 2026 Approval by ORLENS's Supervisory Board revised budget for the New Chemicals project in the amount of PLN 35,8 bn, including PLN 4,6 bn allocated to financing costs.

As of the date of signing this Report, the Management Board of Orlen is in the process of preparing a recommendation regarding the payment of a dividend for the 2025 financial year.

The decision on the payment of the dividend will be taken by the shareholders at the Ordinary General Meeting in 2026.

For information on events subsequent to the reporting period, including the impact of the geopolitical developments in Iran and neighbouring countries on the Group's operations and financial activities, see Section 16 of the financial statements for 2025.

## 8.3 Remuneration of members of the Management Board and Supervisory Board

### General terms of remuneration, conditions for granting annual bonuses, and non-competition agreements

Remuneration policies

The remuneration of the Management Board members at ORLEN S.A. is set by the Supervisory Board, taking into consideration the appropriate resolution of the General Meeting in accordance with the Act on the Principles of Remuneration of Persons Managing Certain Companies (the Salary Cap Act) and the recommendations of its Nomination and Remuneration Committee.

The main components of Management Board members' remuneration scheme are:

- monthly base salary (fixed remuneration),
- variable remuneration contingent on the performance against specific management objectives,
- severance pay for contract termination by the Company,
- non-compete compensation.

All components of remuneration are stipulated in the agreement concluded between the Management Board member and the Company.

Additional benefits for directors reporting to the ORLEN S.A. Management Board may include, in particular, a company car, variable universal life insurance, extended healthcare coverage for the director and their immediate family, including access to preventive healthcare, fitness programmes, and rehabilitation, contribution towards rented accommodation expenses, relocation expense coverage if the move occurs during the director's tenure, benefits as specified in the Rules of the Company Social Benefits Fund, eligibility for the Employee Pension Plan on the terms applicable at the Company, eligibility for the Employee Capital Plan in accordance with the prevailing legal regulations, eligibility for the Company Employee Savings Plan on the terms applicable at the Company, and the entitlement to the car-related benefit MyCar.

General terms and conditions of variable remuneration

Members of the ORLEN S.A. Management Board are entitled to variable remuneration under the terms specified in their respective contracts, which incorporate the Rules of the Incentive Scheme for the Management Board as an appendix.

The amount of variable remuneration depends on the performance against individual targets (both qualitative and quantitative), set by the Supervisory Board for individual members of the Management Board.

Based on the Management Objectives framework established by the ORLEN S.A. General Meeting, the Supervisory Board determines between four to ten individual bonus targets per year, documented in a member's MBO Sheet.

The Supervisory Board may also set a separate objective or objectives for a particular year, which must be met as a precondition to earn variable remuneration for that year.

The performance of a Management Board member against individual bonus targets (both quantitative and qualitative) and the achievement of the separate objectives are annually evaluated by the Supervisory Board, based on the recommendation of the President of the Management Board. This recommendation includes an assessment of the individually performed bonus targets for all members of the Management Board, the Management Board's recommendation concerning the achievement of the separate objective(s), reports on the performance against individual bonus targets by members of the Management Board, ORLEN's financial statements, and other documents deemed appropriate by the Supervisory Board.

The Supervisory Board passes a resolution on awarding or not awarding variable remuneration to a Management Board member for a given financial year, as well as on its amount. This resolution is the basis for the payment of the variable remuneration, subject to the approval of the Company's consolidated financial statements for the financial year by the General Meeting and the discharge of the Management Board member in respect of their duties.

For 2025, the Supervisory Board set quantitative targets for all members of the Management Board with respect to the following metrics:

- LIFO-based EBITDA of the ORLEN Group,
- Net debt / EBITDA of the ORLEN Group,
- Growth capex of the ORLEN Group,
- Maintenance capex of the ORLEN Group;
- General and personnel costs of the ORLEN Group,
- Share of crude oil purchased under long-term contracts for the ORLEN Group,
- Stock performance: ORLEN’s TSR relative to the market,
- accident rate: LTIFR of the ORLEN Group and its external contractors;

and assigned relevant bonus thresholds to these targets.

The Supervisory Board additionally set two qualitative management objectives for all Members of the Management Board, associated with:

- implementation of the ORLEN Group's strategy, including development of a portfolio of projects for research, development, innovation and digitalisation at the ORLEN Group;
- implementation of the ORLEN Group's sustainability strategy and transition plan, including initiatives supporting the professional development of women;

by assigning individual bonus targets to each Management Board member.

In accordance with the resolution of the ORLEN S.A. General Meeting, the Supervisory Board also set separate objectives which must be met as a precondition to qualify for variable remuneration for 2025:

- application at all Group companies of the remuneration rules for members of management and supervisory bodies that are consistent with the provisions of the Act on the Principles of Remuneration of Persons Managing Certain Companies of 9 June 2016,
- application at all Group companies of the remuneration rules for members of management and supervisory bodies that are consistent with the provisions of the Act on the Principles of Remuneration of Persons Managing Certain Companies of 9 June 2016,

fulfilment of the obligations set forth in Article 17-20, Article 22 and Article 23 of the Act on State Property Management of 16 December 2016 at the Company’s subsidiaries within the meaning of Art. 4(3) of the Competition and Consumer Protection Act of 16 February 2007.

In addition, in accordance with the resolution of the ORLEN General Meeting of 5 June 2025, the Supervisory Board established a new wording for one of the abovementioned separate objectives that must be met to qualify for variable remuneration for 2025, which now reads as follows:

- application at all Group companies of the remuneration rules for members of the management and supervisory bodies that are consistent with the provisions of the Act on the Principles of Remuneration of Persons Managing Certain Companies of 9 June 2016, taking into account other legal acts that change or modify the reference salary, including the provisions of laws on specific solutions supporting the implementation of the budget act for the given year;
- fulfilment of the obligations set forth in Article 17-20, Article 22 and Article 23 of the Act on State Property Management of 16 December 2016 at the Company’s subsidiaries within the meaning of Art. 4(3) of the Competition and Consumer Protection Act of 16 February 2007.

For information on bonuses for ORLEN’s key management personnel and compensation for non-compete agreements and termination of appointment, see Section 15.6.1 of consolidated financial statements for 2025.

## Remuneration of Management and Supervisory Board members

### Table 137 Remuneration paid to members of the ORLEN S.A. Management Board for their service in 2025 and 2024 [PLN thousand]

| | 2025 | 2024 |
|---|---|---|
| Ireneusz Fąfara[1)] | 1,498 | 1,007 |
| Witold Literacki[2)] | 1,481 | 1,268 |
| Sławomir Jędrzejczyk[3)] | 365 | - |
| Magdalena Bartoś[4)] | 1,141 | 932 |
| Robert Soszyński[5)] | 1,484 | 932 |
| Ireneusz Sitarski[6)] | 1,482 | 1,084 |
| Wiesław Prugar[5)] | 1,487 | 939 |
| Artur Osuchowski[7)] | 1,150 | 770 |
| Sławomir Staszak[8)] | 368 | - |
| Marek Balawejder[9)] | 1,559 | 597 |
| Marcin Wasilewski[10)] | 1,486 | 216 |
| Kazimierz Mordaszewski[11)] | - | 349 |
| Tomasz Zieliński[11)] | - | 349 |
| Tomasz Sójka[12)] | - | 39 |
| Daniel Obajtek[13)] | - | 651 |
| Armen Artwich[13)] | - | 137 |
| Adam Burak[14)] | - | 164 |
| Patrycja Klarecka[13)] | - | 149 |
| Krzysztof Nowicki[14)] | - | 145 |
| Robert Perkowski[14)] | - | 142 |
| Michał Róg[13)] | - | 142 |
| Piotr Sabat[14)] | - | 178 |
| Jan Szewczak[13)] | - | 138 |
| Iwona Waksmundzka-Olejniczak[14)] | - | 243 |
| Józef Węgrecki[15)] | - | 485 |
| **Total** | **13,501** | **11,056** |

1) Remuneration for service on the Management Board from 11 April 2024
2) Remuneration for serving on the Management Board from 6 February 2024
3) Remuneration for service on the Management Board from 24 September 2025
4) Remuneration for service on the Management Board from 1 May 2024 to 27 August 2025
5) Remuneration for service on the Management Board from 1 May 2024
6) Remuneration for service on the Management Board from 16 May 2024
7) Remuneration for service on the Management Board from 13 June 2024
8) Remuneration for service on the Management Board from 29 September 2025
9) Remuneration for service on the Management Board from 1 August 2024
10) Remuneration for service on the Management Board from 6 November 2024
11) Remuneration for service on the Management Board from 7 February 2024 to 7 May 2024
12) Remuneration for service on the Management Board from 7 February 2024 to 16 February 2024
13) Remuneration for service on the Management Board until 5 February 2024
14) Remuneration for service on the Management Board until 6 February 2024
15) Remuneration for service on the Management Board until 30 April 2024

### Table 138 Bonuses potentially due to members of the ORLEN S.A. Management Board for their service in a given year, to be paid in the following year [PLN thousand]

| | 2025 | 2024 |
|---|---|---|
| Ireneusz Fąfara[1)] | 1,473 | 998 |
| Witold Literacki[2)] | 1,473 | 1,253 |
| Sławomir Jędrzejczyk[3)] | 362 | - |
| Magdalena Bartoś[4)] | 1,013 | 932 |
| Robert Soszyński[5)] | 1,473 | 932 |
| Ireneusz Sitarski[6)] | 1,473 | 878 |
| Wiesław Prugar[5)] | 1,473 | 932 |
| Artur Osuchowski[7)] | 1,013 | 769 |
| Sławomir Staszak[8)] | 343 | - |
| Marek Balawejder[9)] | 1,473 | 583 |
| Marcin Wasilewski[10)] | 1,473 | 213 |
| **Total** | **13,042** | **7,490** |

1) Remuneration for service on the Management Board from 11 April 2024
2) Remuneration for service on the Management Board from 6 February 2024
3) Remuneration for service on the Management Board from 24 September 2024
4) Remuneration for service on the Management Board from 1 May 2024 to 27 August 2025
5) Remuneration for service on the Management Board from 1 May 2024
6) Remuneration for service on the Management Board from 16 May 2024
7) Remuneration for service on the Management Board from 13 June 2024
8) Remuneration for service on the Management Board from 29 September 2025
9) Remuneration for service on the Management Board from 1 August 2024
10) Remuneration for service on the Management Board from 6 November 2024

### Table 139 Termination benefits for former members of the Management Board [PLN thousand]

| | 2025 | 2024 |
|---|---|---|
| Magdalena Bartoś | 898 | - |
| Artur Osuchowski | 898 | - |
| Daniel Obajtek | - | 1,049 |
| Armen Artwich | - | 699 |
| Adam Burak | - | 1,049 |
| Patrycja Klarecka | - | 699 |

| | | |
|---|---|---|
| Krzysztof Nowicki | - | 1,049 |
| Robert Perkowski | - | 1,049 |
| Michał Róg | - | 699 |
| Piotr Sabat | - | 1,049 |
| Jan Szewczak | - | 699 |
| Iwona Waksmundzka-Olejniczak | - | 1,048 |
| Józef Węgrecki | - | 1,048 |
| **Total** | **1,796** | **10,137** |

## Remuneration of members of the Management Board and Supervisory Board of the Company who hold positions on governing bodies of subsidiaries

During their tenure, members of the ORLEN S.A. Management Board are required to obtain approval from the Supervisory Board before serving on the governing bodies of other legal entities, including foundations or associations. Members of the ORLEN Management Board are not compensated for their roles on the governing bodies of the Company's subsidiaries within the group, as defined in Article 4(14) of the Competition and Consumer Protection Act of 16 February 2007.

Table 140 Remuneration of members of the ORLEN S.A. Supervisory Board [PLN thousand]

| | 2025 | 2024 |
|---|---|---|
| Przemysław Ciszak[1)] | 55 | - |
| Aleksander Kappes[2)] | 19 | - |
| Katarzyna Łobos[3)] | 171 | 170 |
| Przemysław Baszak[2)] | 19 | - |
| Ewa Gąsiorek[3)] | 173 | 171 |
| Marian Sewerski[4)] | 171 | 81 |
| Ewa Sowińska[5)] | 179 | 15 |
| Piotr Wielowieyski[6)] | 172 | 113 |
| Tomasz Zieliński[3)] | 173 | 122 |
| Michał Gajdus[3)] | 146 | 170 |
| Kazimierz Mordaszewski[3)] | 146 | 121 |
| Mikołaj Pietrzak[3)] | 146 | 170 |
| Wojciech Popiołek[7)] | 162 | 195 |
| Wojciech Jasiński[3)] | - | 20 |
| Barbara Jarzembowska[3)] | - | 19 |
| Andrzej Kapała[3)] | - | 19 |
| Roman Kusz[3)] | - | 19 |
| Jadwiga Lesisz[3)] | - | 19 |
| Anna Sakowicz-Kacz[3)] | - | 19 |
| Ireneusz Sitarski[8)] | - | 24 |
| Andrzej Szumański[3)] | - | 19 |
| Anna Wójcik[3)] | - | 19 |
| **Total** | **1,732** | **1,505** |

1) Remuneration for service on the Supervisory Board from 22 August 2025
2) Remuneration for service on the Supervisory Board from 13 November 2025
3) Remuneration for service on the Supervisory Board to 6 February 2024
4) Remuneration for service on the Supervisory Board from 24 July 2024
5) Remuneration for service on the Supervisory Board from 2 December 2024
6) Remuneration for service on the Supervisory Board from 25 April 2024 to 25 June 2004 and from 24 July 2024
7) Remuneration for service on the Supervisory Board from 25 January 2024
8) Remuneration for service on the Supervisory Board from 6 February 2024 to 15 May 2024

## Remuneration of key management personnel at the ORLEN Group

Table 141 Remuneration of key management personnel at the ORLEN Group [PLN thousand]

| | 2025 | 2024 |
|---|---|---|
| Remuneration and other benefits of key management personnel* | **70,129** | **79,310** |

* Including remuneration of members of key management personnel for joint operation at Rafineria Gdańska

# 8.4 Shares in ORLEN S.A.'s related entities reported as long-term investments – overview of financial data of the most significant entities

Table 142 Financial and operational highlights of the Energa Group [PLN million]

| | 2025 | 2024 |
|---|---|---|
| Revenue | 21,741 | 22,753 |
| **EBITDA** | **3,633** | **2,869** |
| EBIT | 2,203 | 1,612 |
| Net profit | 1,209 | 567 |
| Equity | 14,121 | 13,111 |
| Total assets | 40,617 | 36,000 |

## Table 143 Financial and operational highlights of the ORLEN Unipetrol Group [PLN million]

| | 2025 | 2024 |
|---|---|---|
| Revenue | 25,824 | 27,952 |
| **EBITDA** | **(6,727)** | **(1,860)** |
| EBIT | (7,902) | (2,965) |
| Net profit | (8,030) | (2,746) |
| Equity | 3,837 | 11,659 |
| Total assets | 12,994 | 20,718 |

## Table 144 Financial and operational highlights of the ORLEN Lietuva Group (consistent with the figures used for the purposes of consolidating the ORLEN Group's financial statements) [PLN million]

| | 2025 | 2024 |
|---|---|---|
| Revenue | 22,833 | 25,475 |
| **EBITDA** | **145** | **(2,687)** |
| EBIT | 136 | (2,741) |
| Net profit | 100 | (2,897) |
| Equity | 1,088 | (575) |
| Total assets | 3,477 | 3,479 |

## Table 145 Financial and operational highlights of ORLEN Upstream Norway AS [PLN million]

| | 2025 | 2024 |
|---|---|---|
| Revenue | 10,177 | 11,509 |
| **EBITDA** | **6,969** | **8,512** |
| EBIT | 4,347 | 5,542 |
| Net profit | 942 | 1,597 |
| Equity | 4,831 | 4,132 |
| Total assets | 20,392 | 19,017 |

## Table 146 Financial and operational highlights of Polska Spółka Gazownictwa Sp. z o.o. [PLN million]

| | 2025 | 2024 |
|---|---|---|
| Revenue | 8,951 | 7,297 |
| **EBITDA** | **4,274** | **3,120** |
| EBIT | 2,606 | 1,556 |
| Net profit | 1,658 | 801 |
| Equity | 18,682 | 17,034 |
| Total assets | 29,593 | 28,468 |

## Table 147 Financial and operational highlights of ORLEN TERMIKA S.A. [PLN million]

| | 2025 | 2024 |
|---|---|---|
| Revenue | 8,345 | 8,870 |
| **EBITDA** | **2,224** | **1,900** |
| EBIT | 1,552 | 1,287 |
| Net profit | 1,147 | 868 |
| Equity | 4,532 | 3,386 |
| Total assets | 9,906 | 11,072 |

## Table 148 Financial and operational highlights of myORLEN Sp. z o.o. [PLN million]

| | 2025 | 2024 |
|---|---|---|
| Revenue | 22,849 | 27,147 |
| **EBITDA** | **2,165** | **(79)** |
| EBIT | 2,131 | (105) |
| Net profit | 1,763 | 4 |
| Equity | 4,149 | 2,895 |
| Total assets | 7,737 | 7,784 |

Table 149 Financial and operational highlights of ORLEN Deutschland GmbH [PLN million]

| | 2025 | 2024 |
|---|---|---|
| Revenue | 13,798 | 13,116 |
| **EBITDA** | **561** | **481** |
| EBIT | 339 | 263 |
| Net profit | 239 | 185 |
| Equity | 1,019 | 973 |
| Total assets | 4,080 | 3,288 |

## 8.5 Changes in holdings of ORLEN S.A. shares by members of the Management Board and Supervisory Board

Table 150 Changes in holdings of ORLEN shares by members of the Management Board

| | Number of shares and options as at 31 Dec 2024 | Acquisition | Sale | Number of shares and options as at 31 Dec 2025 |
|---|---|---|---|---|
| Ireneusz Fąfara | - | 1,743 | - | 1,743 |
| Marek Balawejder | 77 | 1,823 | - | 1,900 |
| Marcin Wasilewski | - | 4,607 | - | 4,607 |
| Magdalena Bartoś* | - | 4,100 | - | - |

* Member of the Management Board until 27 August 2025

At the date of this Management Board's Report, members of the Supervisory Board did not hold any ORLEN shares.

In the period covered by this Management Board's Report, there were no changes in the holdings of ORLEN shares by members of the Supervisory Board.

As at the date of preparation of this Report, the Members of the Management Board did not hold any shares in entities related to ORLEN.

## 8.6 Detailed description of the ORLEN Group's structure and its changes

For a description of the organisational and cross-equity links between the Parent and other ORLEN Group companies, and the applied consolidation methods, see Section 7.1 of the consolidated financial statements for 2025.

In 2025, an amendment was drafted to the ORLEN Group Cooperation Agreement applicable across the ORLEN Group companies (the so-called "ORLEN Group Constitution"). Its main purpose was to further standardise and strengthen the companies' operation in line with the interests and common strategy of the ORLEN Group, while also clarifying and reinforcing the principles of cooperation between ORLEN Group companies.

There were no other material changes in 2025 to the rules governing the organisation and management of the other ORLEN Group companies. For information on the existing organisational structure of the ORLEN Group companies and their governing bodies, see ORLEN website.

For details of changes in the ORLEN Group structure, see Section 7.2 of the consolidated financial statements for 2025.

For information on the responsibilities of members of the ORLEN S.A. Management Board, see Section 7.4 of this Report. For a description of changes in the composition of the Management Board and Supervisory Board in 2025 and by the issue date of this Report, see Sections 7.4 and 7.5 of this Report.

## 8.7 Key intangible assets

Intangible assets play a vital role in ensuring the long-term success of the ORLEN Group and help sustain our competitive edge in a rapidly evolving market environment. Our business model is closely tied to our intangible assets, which form a cornerstone of our operations and represent a major driver of value creation. We have several key intangible assets that are central to our competitive advantage, including:

- Brand and reputation – the ORLEN brand is one of the most recognisable in Central and Eastern Europe, contributing to customer loyalty, investor appeal, and long-term business partnerships. This has a positive effect on the stability of our cash flows.
- Human capital – our highly qualified, skilled, and experienced workforce is one of the organisation's key assets, comprising professionals and experts in engineering, energy, chemistry, and management. This talent pool is essential to maintaining the competitive position of the ORLEN Group.

- Relationships with partners, customers, and suppliers – long-standing business relationships built on transparency, together with close cooperation with suppliers, customers, local authorities and financial institutions, ensure stable operations in global markets.
- Intellectual property, technology, and know-how – we hold advanced expertise in crude oil refining, petrochemicals, and state-of-the-art energy technologies, including renewable energy sources.
- Patents and proprietary technologies – we continue to innovate in such areas as alternative fuels, biocomponents, and hydrogen technologies, securing our intellectual property through patent protection.
- Databases and IT systems – advanced data management, logistics, and analytics systems support efficient decision-making and process optimisation.
- Regulatory compliance and licences – we hold numerous licences for the production, processing, and distribution of hydrocarbons and fuels, translating into a strong competitive advantage in the energy sector.

## Table 151 Glossary of selected industry terms

| Term | Description |
|---|---|
| BARREL | Unit of volume used for measuring liquids, mainly in crude oil trading and in the oil industry. 1 barrel of oil (1 bbl) = 42 US gallons = 158.96832 litres. |
| BIOETHANOL | Ethyl alcohol made from biomass or biodegradable waste. |
| BOE | Barrel of oil equivalent. |
| CLS | Canadian Light Sweet oil prices at Edmonton, Province of Alberta. |
| CODO / COCO | Company Owned Dealer Operated service station / Company Owned Company Operated service station. |
| $CO_2e$/MJ | Unit of measure of GHG emissions. |
| DISTILLATION | A physical separation technique for liquid mixtures that relies on the differing boiling points of the individual components within the mixture being separated. |
| DES | The Delivery-Ex-Ship formula: the LNG seller ensures delivery of the vessel carrying LNG to the port chosen by the buyer. |
| PRICE DIFFERENTIAL | Calculated on the basis of the actual shares of the crude oil types processed. Spot market quotations. |
| DOFO / DODO | Dealer Owned Franchisee Operated service station / Dealer Owned Dealer Operated service station. |
| CNG | Compressed natural gas. |
| EIA | Energy Information Administration (US). |
| EEX | European Energy Exchange AG. |
| EU ETS | The EU Emissions Trading Scheme. |
| FOB | The Free-on-Board formula: the LNG seller ensures delivery of LNG to a tanker at the port of loading. |
| FSRU | Floating Storage Regasification Unit, i.e. a type of vessel capable of LNG unloading, process storage and regasification, as well as providing additional services. |
| GHG | Greenhouse gases, i.e. atmospheric gases that trap solar energy within the Earth's atmosphere, thereby contributing to the greenhouse effect. |
| HENRY HUB | A pricing hub in the United States. |
| HVO | Hydrotreated vegetable oil unit. |
| HYDROCRACKING | Catalytic cracking of hydrocarbons in the presence of hydrogen. The process improves yields of light petroleum products. |
| HYDRODESULFURISATION | Process of removing sulfur compounds by adding hydrogen to petroleum fractions at elevated temperature and pressure in catalytic beds. |
| ICE | Intercontinental Exchange – and energy and commodity exchange. |
| CATALYST | A substance that accelerates (initiates) an expected chemical reaction. |
| KM | (Linear) kilometre. |

| Term | Description |
|---|---|
| KPMG | Cavern gas storage facility. |
| CRACKING | Thermal or catalytic conversion of heavy or complex hydrocarbons into light products and coke, resulting in increased yields of light petroleum products. |
| LNG | Liquefied natural gas. |
| MED STRIP | Brent oil prices. |
| MMR | Micro Modular Reactor, a nuclear energy system. |
| MODEL REFINING MARGIN | Margin calculated based on the following formula (until 31 July 2022): revenue from sales of products (93.5% products = 36% gasoline + 43% diesel oil + 14.5% heavy fuel oil) minus costs (100% feedstock: crude oil and other raw materials). Total feedstock is calculated based on Brent price. Spot market quotations. Margin calculated based on the following formula (from 1 August 2022): revenue (93.6% products = 33% gasoline + 48% diesel oil + 13% heavy fuel oil) minus costs (100% feedstock: 98% Brent crude + 2% natural gas). Spot market quotations. |
| MODEL PETROCHEMICAL MARGIN | Margin calculated based on the following formula: revenue from sales of products (98% products = 44% HDPE + 7% LDPE + 35% PP Homo + 12% PP Copo) minus costs (100% feedstock = 75% naphtha + 25% LS VGO). Contract market quotations. |
| MODEL OLEFIN MARGIN | Margin calculated based on the following formula: revenue (100% products = 0.85*ethylene*54% + 0.92*propylene *28%+ 0.84*glycols*9% + 0.81 *butadiene*6% + 0.8* ethylene oxide* 3%) minus costs (100% feedstock = 100% naphtha). Product prices based on market quotations. |
| MONOMERS | Molecules, either of the same or various chemical compounds, that have a relatively low molecular weight. Through polymerisation reactions, monomers form polymers. Examples of monomers include ethylene and propylene. |
| MWe | Megawatt electric. |
| MWt | Megawatt thermal. |
| NBP | National Balancing Point – a pricing hub in the UK. |
| NCG | NetConnect Germany GmbH & Co. KG – a pricing hub in Germany. |
| NCI | Net Carbon Intensity – an indicator measuring net emissions from energy products sold in $gCO_2e/MJ$ for Scope 1, 2 and 3 emissions. |
| NCR | National Reduction Target – an indicator defining the required minimum greenhouse gas emission reduction, calculated per unit of energy, across the lifecycle of various fuels used in transport (liquid fuels, liquid biofuels, liquefied petroleum gas (LPG), compressed natural gas (CNG), liquefied natural gas (LNG), engine oil for inland waterway vessels, or hydrogen), whether disposed of by way of any legal or actual transaction or consumed by the entity for its own needs, and electricity used in motor vehicles, whether sold to end users or used by the entity for its own needs. |
| NIT | National Indicative Target – an indicator defining the required minimum share of biocomponents in the total volume of liquid fuels and biofuels, whether sold on the market or used for the entity's own needs, in a given calendar year. |
| NGL | Natural gas liquids, i.e. components of natural gas consisting of molecules that are heavier than methane, such as ethane, propane, butane, isobutane, etc. |

| Term | Description |
|---|---|
| $Nm^3$ | Normal cubic meter of gas. |
| NET WELLS | Number of wells adjusted for other licence partners' interests. |
| OECD | Organisation for Economic Cooperation and Development. |
| OPEC | Organisation of the Petroleum Exporting Countries. |
| OTC | Over-the-counter market, i.e. an unregulated platform where transactions are executed directly between market participants, without commission fees. It operates without a supervisory authority. Trading takes place on a 24 hour basis, with the exception of weekends. |
| UGSF | Underground gas storage facility. |
| POLYMERS | Chemical substances of very high molecular weight, composed of many repeat units called mers. Examples of polymers are polyethylene and polypropylene. |
| SMR | Small Modular Reactor – a technology for small, modular nuclear reactors with a capacity of up to 300 MW. |
| SSLNG | Small-scale liquefied natural gas. |
| POLPX | Polish Power Exchange – Towarowa Giełda Energii S.A. |
| THE | Trading Hub Europe – a pricing hub in Germany. |
| TPA | Third Party Access (TPA) principle, i.e. a principle that ensures access for third parties to a local energy or gas supplier's infrastructure for the purpose of delivering electricity or gas to the customer, even if those commodities are purchased from a different supplier. |
| TRR | Total Recordable Rate – an internationally recognised metric of a company’s rate of workplace accidents calculated as follows: (number of workplace accidents in a period of time / number of hours worked in the same period) x 1,000,000. |
| TTF | Title Transfer Facility – a pricing hub in the Netherlands. |
| T1 PSER | Tier 1 Process Safety Events Rate – number of events of greater consequence related to substance release into the atmosphere x 1,000,000/number of man-hours. |
| T2 PSER | Number of events of lesser consequence related to substance release into the atmosphere x 1,000,000/ number of man-hours. |
| Safety Culture Indicator | The Safety Culture Indicator is calculated as the sum of: the product of the percentage representing the company’s achievement of the target for the combined TRR (covering both the company and its contractors) and 0.7 (injury rate weight in the Safety Culture Indicator); and the product of the percentage representing the company’s achievement of the target for the Risk Notification and Handling Indicator and 0.3 (risk notification weight in the Safety Culture Indicator). |
| WTI | West Texas Intermediate oil prices. |
| UPSTREAM VALUE CHAIN | Hydrocarbon exploration and production activities. |
| URAL RDAM (URAL CIF ROTTERDAM) | Urals oil prices in Rotterdam. |
| URE | Energy Regulatory Office – energy market regulator in Poland. |

| Term | Description |
|---|---|
| VISBREAKING | Thermal cracking of petroleum tar, i.e. a heavy oil byproduct from the vacuum distillation of crude oil. TRR (covering both the company and its contractors) and 0.7 (injury rate weight in the Safety Culture Indicator); and the product of the percentage representing the company's achievement of the target for the Risk Notification and Handling Indicator and 0.3 (risk notification weight in the Safety Culture Indicator). |
| HYDROCARBONS | Organic compounds composed of carbon and hydrogen. Crude oil and natural gas are mixtures of hydrocarbons. |
| HIGH-EFFICIENCY COGENERATION | The simultaneous production of electricity or mechanical energy and useful heat, achieving at least 10% savings in primary energy use compared to the separate generation of electricity and heat or, in the case of cogeneration units with an installed electrical capacity of less than 1 MW, compared to the separate generation of electricity and heat. |

A glossary of defined terms and acronyms can also be found on the Company's website: http://www.orlen.pl.

# 9. Authorisation of the Management Board's Report on the operations of the ORLEN Group and ORLEN S.A.

The Management Board of ORLEN S.A. represents that this Management Board's Report on the operations of the ORLEN Group and ORLEN S.A. for 2025 gives a fair view of the development and profitability of the ORLEN Group's operations and its standing, including the description of key risks and threats, and has been prepared in accordance with the Accounting Act, the European Sustainability Reporting Standards (ESRS), and Article 8 of Regulation (EU) 2020/852 together with the delegated acts adopted pursuant to Article 8(4) of that Regulation.

This Management Board's Report on the operations of the ORLEN Group and ORLEN S.A. was authorised by the Parent's Management Board on 28 April 2026.

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Ireneusz Fąfara

President of the Management Board

| | | |
|---|---|---|
| ..... | ..... | ..... |
| Witold Literacki | Robert Soszyński | Sławomir Staszak |
| Vice President of the Management Board | Vice President of the Management Board | Member of the Management Board |
| ..... | ..... | ..... |
| Sławomir Jędrzejczyk | Marek Balawejder | Marcin Wasilewski |
| Vice President of the Management Board | Member of the Management Board | Member of the Management Board |
| ..... | ..... | ..... |
| Ireneusz Sitarski | Wiesław Prugar | Paweł Wojtunik |
| Vice President of the Management Board | Member of the Management Board | Member of the Management Board |