

Translation from Lithuanian language



Sustainability Report

for the 2025 financial year





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General basis for preparation of Sustainability Report

In accordance with the exemption under Article 23(1) of Law on Reporting of Companies and Groups of Companies of the Republic of Lithuania, no separate Sustainability Report is prepared by AB ORLEN Lietuva (hereinafter, ORLEN Lietuva or the Company) in accordance with the requirements of the European Sustainability Reporting Standards (hereinafter, ESRS). This Sustainability Report is prepared voluntarily and in a free format.

Sustainability reporting period coincides with the Company's financial year starting 1 January and ending 31 December. The voluntary report is not an xHTML document and does not comply with the requirements of the Commission Delegated Regulation on the European Single Electronic Format (ESEF). This Report contains only information on the Company and its operations in Lithuania and does not include its subsidiaries SIA ORLEN Latvija, OÜ ORLEN Eesti and AB ORLEN Mockavos Terminalas.

The Company, as part of the ORLEN Group, contributes to the preparation of the consolidated Management Board's Report on the operations of the ORLEN Group and ORLEN S.A. in 2025. This report is prepared by the parent company, ORLEN Spółka Akcyjna, with its registered office at Chemików 7, 09-411 Płock, Poland. Contribution is made by providing the required sustainability-related data, completing the relevant ESRS questionnaires, and complying with the disclosure requirements set out in Commission Delegated Regulation (EU) 2023/2772.

This Report presents, in a free format, information on the Company's activities that are aligned with the EU taxonomy, in accordance with the six environmental objectives set out in 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.

The sustainability section of the ORLEN Group's consolidated report has been verified by an independent external assessor; the report for the 2025 financial year is available [here](#).

This Sustainability Report contains summarized information on the Company's main sustainability objectives, general data, and structured information on taxonomy-aligned activities, including related operating (OPEX) and capital (CAPEX) expenditures, as well as revenues from taxonomy-aligned activities. In addition, the report discusses the key environmental, social responsibility, and governance aspects relevant to the Company. As this report is prepared on a voluntary basis, the Company exercises its right not to disclose confidential information or data for which consent from the respective owners has not been obtained. This report is made public as a separate document and does not contain financial details – this information is made available [here](#).

Where appropriate, comparative data for 2024, and in some cases for earlier periods, is provided to illustrate performance trends. The purpose of this report is to foster transparent communication with stakeholders by presenting the Company's sustainability strategy, objectives, achievements, and future challenges.





Brief overview of data used

No separate limited assurance audit has been carried out for this report. Nevertheless, certain Company data is audited during individual audits and inspections and/or is submitted to the relevant Lithuanian or other authorities. This section provides a summary of data that has been audited, submitted to external institutions, or otherwise verified. It should be noted that part of this data was used in the preparation of the consolidated Management Board's Report on the operations of the ORLEN Group and ORLEN S.A. in 2025, the external verification of which, including the sustainability statement, was performed by the audit firm KPMG Audyt Spółka z ograniczoną odpowiedzialnością sp.k.

- Data for calculating ORLEN Lietuva Group Corporate Carbon Footprint was provided in a consolidated manner for the preparation of the Management Board's Report on the operations of the ORLEN Group and ORLEN S.A. in 2025. The calculations were verified by ORLEN S.A. employees, while the external verification of the ORLEN Group results is carried out by Bureau Veritas Certification Polska sp. z o.o (the results presented in the report have not yet been confirmed).
- In 2025, DGE Group verified the calculations and results of the Company's Product Carbon Footprint (PCF) for 2024.
- An audit of the Company's CO₂ emissions was carried out (the audited amount of CO₂ emissions in 2025 was 1,689,963 t). The audit was carried out by an independent assessor from UAB Bureau Veritas, who verified how the Company implemented CO₂ emission accounting in 2025 in accordance with the written procedures for its activities approved under the GHG Monitoring Plan. As in previous years, the volume of CO₂ emissions has also been reported to the European Union Emissions Trading System (EU ETS) registry.

- Data on water use, wastewater management, ambient air protection, and on pollutants released and transferred was submitted to the Environmental Protection Agency via information system AIVIKS.
- Data on waste generation and management was submitted to the Environmental Protection Agency via Unified Product, Packaging and Waste Accounting Information System GPAIS.
- Data on groundwater extraction was submitted to the Lithuanian Geological Survey via the electronic system of the Subsurface Resources Register.

Where relevant, two currencies were used in the report: euro and the Company's functional currency - US dollar.

Main sustainability goals of the Company:

2030 targets:

- Targeted water, energy consumption reduction
- Reduction of greenhouse gas (GHG), SO₂, NO_x and other emissions
- Bitumen production increase, new grades of bitumen
- Development of SAF blending infrastructure
- Development of renewable solar and wind energy sources
- Green hydrogen production

Vision 2050:

**ORLEN Lietuva –
climate neutral**

Company's reduction targets vs 2019:

6%	GHG emissions	15%	NO _x
47%	NMVOC*	31%	SO ₂

Other targets:

0	workplace accidents with employees of the Company and contractors
0	cases of corruption or bribery against the Company or its employees
0	cases involving signs of mobbing, discrimination, violence, or harassment across entire value chain
≥ 70%	generated waste recycled and/or reused (R3, R4, R5, and R9)**

Develop and implement IMS Policy.

Enhance technologies to increase economic efficiency of production processes, contributing to the strengthening of national energy independence.

Overview of the Company

ORLEN Lietuva operates crude oil refinery in Mažeikiai District (operating since 1980) and Būtingė Terminal (operating since 1999). The Company also operates oil transshipment stations in Biržai and Joniškis, some employees work in Vilnius. Currently, the Company is the only crude refinery in the Baltic States.

In 2025, the Company had three subsidiaries - SIA ORLEN Latvija, OÜ ORLEN Eesti, and AB ORLEN Mockavos Terminalas, as well as one associated company - the Lithuanian-French limited liability company NAFTELF. Subsidiaries in Latvia and Estonia are engaged in the wholesale of petroleum products, while AB ORLEN Mockavos Terminalas (operating in Lazdijai District in Lithuania) is engaged in transshipment of petroleum products (gasoline and diesel fuel). NAFTELF, headquartered in Vilnius, is engaged in jet fuel trading and construction of jet fuel storage facilities (the Company holds 34% of shares).

Annual capacity of the refinery is up to 10.4 million tons of crude. The Company has a significant impact on the Lithuanian economy - it is the largest taxpayer (including excise duties and VAT) and among the largest companies in Lithuania by revenue. ORLEN Lietuva is the leading supplier of gasoline and diesel in Lithuania, Latvia and Estonia. The Company also sells its products to other countries, including WE, USA, Ukraine, and others.



The Company implements modernization programs aimed at increasing operational efficiency, improving the quality of its products, ensuring employee safety and health, and reducing environmental impact. Continuous optimization of refining processes enables the Company to produce high-quality products that meet the regulatory and quality requirements of different markets.

The sole shareholder of AB ORLEN Lietuva is Polish Oil Company ORLEN S.A. (ORLEN Spółka Akcyjna), the leading oil refining group in Central and Eastern Europe, code 610188201, address: Ul. Chemików 7, 09411 Plock, Poland. ORLEN S.A. is entitled to 100% of the Company's shares. Approved structure of shareholders is available [here](#).

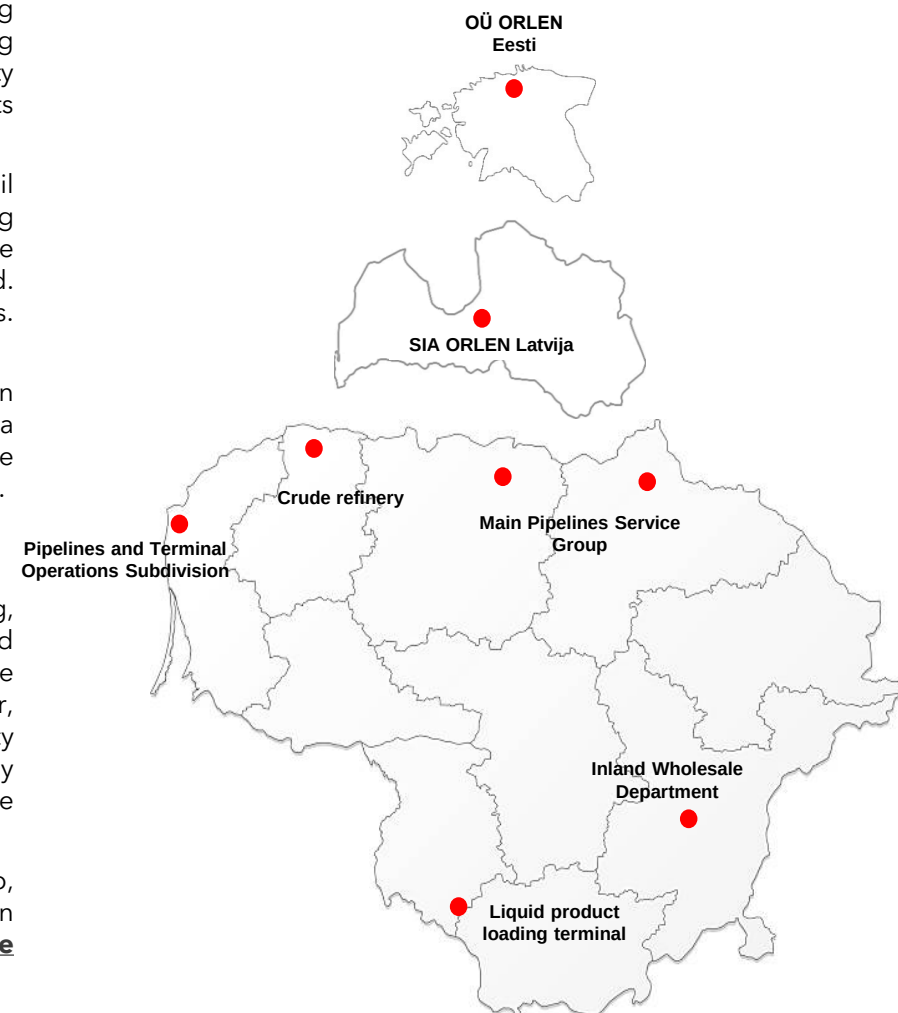
In 2025, the Company did not acquire or transfer its own shares and did not establish any branches. ORLEN Lietuva representative office in Ukraine was de-registered from the State Register of Legal Entities of Ukraine on 14 August 2025.

Key activities of ORLEN Lietuva

The Company's key activities are focused on oil refining, production of petroleum products, propylene, granulated elemental sulfur, and energy (heat and electricity), wholesale of fuels, bitumen, propylene, and granulated elemental sulfur, fuel transportation and other services such as electricity trading, administrative and corporate services. The Company also carries out other business activities necessary to achieve its objectives.

Detailed information on the value of chain of ORLEN Group, including ORLEN Lietuva, by segments is available in [Management Board's Report on the operations of the ORLEN Group and ORLEN S.A. in 2025](#).

ORLEN Lietuva Group



ORLEN Group Core Values

In its operations, ORLEN Lietuva adheres to the core values adopted across the entire ORLEN Group.



Responsibility

Business
Society
Environment



People

Ethics
Professionalism
Cooperation



Reliability

Safety
Quality
Compliance



Development

Innovation
Competitiveness
Modernity



Energy

Strength
Courage
Success



ORLEN Group Strategy 2035



The Company, together with ORLEN S.A. and other Group companies, is systematically pursuing GHG emission reduction targets for 2035.

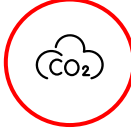
Fuel and energy sector, particularly modern oil refineries, including companies within the ORLEN Group, face significant challenges related to the systemic transformation of business model in the context of energy transition. One of key challenges remains the tension between the need to reduce GHG emissions and the requirement to ensure reliable and uninterrupted energy supply.

Modernization is one of the most important factors enabling the Company to ensure high product quality, maintain market competitiveness, and secure long-term business sustainability. It is also necessary in order to comply with European Union climate policy requirements, including the **European Green Deal** and the **Paris Agreement** and to consistently reduce GHG emissions with the aim of achieving climate neutrality by 2050. As environmental requirements become more stringent, the need to modernize infrastructure, implement advanced technologies, diversify energy sources, and develop renewable energy solutions is increasing. These challenges necessitate the adoption of an integrated and sustainable approach to energy transition and decarbonization.

On 9 January 2025, ORLEN announced the most ambitious and largest investment program in the Group’s history - ‘the Energy of Tomorrow Starts Today’. For Group strategy, ambitions and targets see [here](#). The key strategic priorities include energy security, modernization, the achievement of environmental objectives, and the expansion of the product portfolio. Up to PLN 380 billion (approximately EUR 95 billion) is planned to be invested to implement the strategy. The strategy is focusing on four key segments: upstream, downstream, energy, consumers and products. In addition to large-scale investments, modernization of production capacities, and the development of energy infrastructure, ORLEN’s strategy includes projects the outcomes of which will directly impact customers, with the aim of ensuring more affordable energy. ORLEN plans to implement modern solutions and expand its supply to consumers. An important part of the updated strategy is the expansion of fuel portfolio, with the goal that by 2035 more than 25% will be based on zero-emission sources.



Table 1. ORLEN Group decarbonization targets

	Group 2030 targets	Group 2035 targets	2050 vision
 Absolute emissions from refining, petrochemical and upstream processes ¹	-13%	-25%	
 Emissions intensity in Energy segment ²	-40%	-55%	Net zero for Scope 1, 2 and 3 emissions in accordance with the Paris Agreement
 Net carbon intensity (NCI) ³	-10%	-15%	

Base year - 2019.

¹ Emissions volume in the Upstream and Downstream segments, measured as Mt CO₂e, for Scope 1 and 2 GHG emissions
² Carbon intensity in the Energy segment, measured as kg CO₂e/MWh, for Scope 1 GHG emissions
³ Carbon intensity of produced energy products, measured as g CO₂e/MJ, for Scope 1, 2 and category 11 of Scope 3 GHG emissions
⁴ Ambition to reduce emissions is consistent with the goal of limiting climate warming to 1.5 °C by 2050. The achievement of our long-term targets will depend on the technological progress and the regulatory and legal context.



ORLEN Group Sustainability Strategy 2025-2035

In 2025, following the update of the ORLEN Group’s strategy, an updated ORLEN Group sustainability strategy was also announced in March of the same year – a comprehensive framework guiding the development and operations of Group companies in line with sustainability principles. Pillars of sustainable strategy: climate, environment, employees, communities, and governance. These pillars transform into 18 streams with short-, mid- and long-term goals linking the pillars of the strategy with the UN Sustainable Development Goals (SDGs), European Sustainability Reporting Standards (ESRS), and the Ten Principles of the UN Global Compact.

ORLEN has joined the **UN Global Compact** in 2024. Such approach to strategy development and implementation not only strengthens the commitment to responsible business practices but also ensures comprehensive and transparent sustainability reporting in accordance with Corporate Sustainability Reporting Directive and other requirements. ORLEN Group sustainability strategy and targets are described in more detail in **Management Report on the activities of the ORLEN Group and ORLEN S.A. for 2025** whereas ORLEN Group sustainability strategy is available **here**. As part of the Group, the Company contributes to the achievement of certain targets set for 2035.

ORLEN Group sustainability strategy streams

Action to minimize climate impact:	Environment and biodiversity protection:	Occupational safety and well-being
- Decarbonization - Energy transition - Climate change adaptation	- Biodiversity protection - Water and wastewater management - Circular economy, pollution reduction	- Occupational Health and Safety - Process safety - Employee health care - Well-being
Relations with stakeholders and communities:	Responsible governance:	
- Engagement with local communities - Just Transition program - Education to raise sustainability awareness	- Sustainable value chain - Cybersecurity - Respect for human rights - Diversity and inclusion - Ethics, compliance and anti-corruption	



At present, protection of biodiversity is not among priority sustainability areas of the Company whereas within or around the Company’s sites (including transshipment stations in Biržai and Joniškis) biodiversity-sensitive areas do not exist. From biodiversity perspective, the most sensitive area is the Baltic Sea, where Būtingė Terminal operates. The Terminal handles crude oil therefore, in the event of accident, the potentiality of negative impact on the biodiversity of the Baltic Sea exists. To prevent this, the impact on the marine environment is continuously monitored and controlled to identify any changes related to the operations of Būtingė Terminal. In the future, additional measures are planned to contribute to biodiversity and ecosystems, through the implementation of a Group-wide biodiversity action plan currently under development.

Just Transition program defined in ORLEN Group strategy is also not among priority areas for the Company – this program is implemented by the parent company ORLEN S.A.

All other areas defined in the strategy are considered material by the Company, and therefore a range of measures are implemented within them.

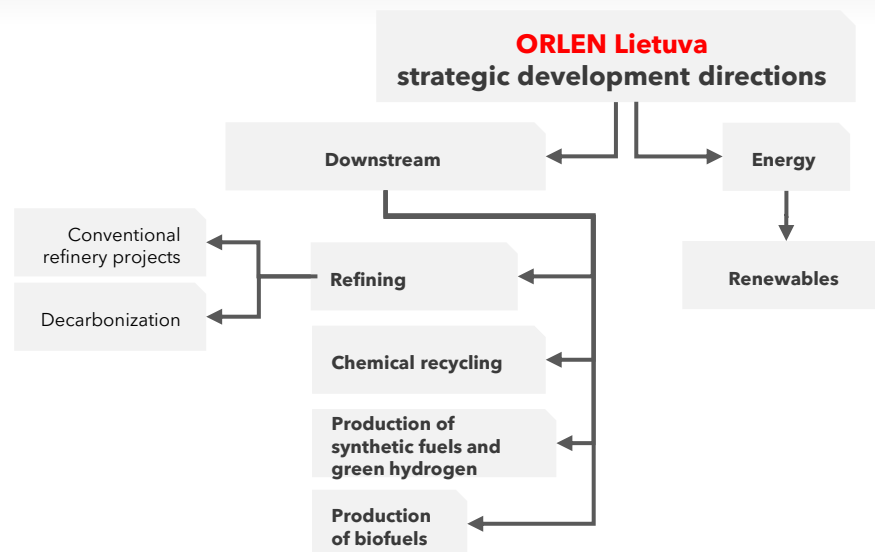
Company's strategic development directions

ORLEN Lietuva annually reviews and prepares the Company's strategic development plan. The plan defines the Company's mission, vision, values, and competitive advantages. It also includes PESTEL (political, economic, social, technological, environmental, and legal) and SWOT (strengths, weaknesses, opportunities, and threats) analyses, a general market overview, and, in the Company's assessment, the key challenges related to energy, environmental protection, and maintenance. In addition, it covers the Company's current situation (key performance indicators and major investment activities across all areas), macroeconomic assumptions, the Company's role within the ORLEN Group strategy, the 2035 targets and related key challenges, as well as the main directions and projects planned to achieve these targets, including their key parameters (capacity, investments, timeline, impact on EBITDA, and additional staffing requirements). The plan also addresses CAPEX and OPEX forecasts, key financial, sales, production, energy, maintenance, logistics, environmental, human resources, and other indicators, the electricity balance, occupational safety and health (OSH) matters, and the communication strategy (stakeholder engagement, reputation management, and brand awareness). It presents future refinery vision and covers other relevant aspects.

In 2025, the Company invested USD 177.0 million in tangible and intangible assets (excluding the accounting of leased assets under IFRS 16), while in 2024 investments amounted to USD 298.2 million. As a member of ORLEN Group, ORLEN Lietuva contributes to implementation of Group's strategy in two out of four key areas – downstream segment and the energy segment. This section briefly outlines these development directions.

Refining - conventional refinery projects

Conventional refinery projects aim to increase the production of products in demand on the market, develop new in-demand products, and implement projects that enhance the refinery's flexibility in terms of feedstock. This direction also includes projects aimed at ensuring business continuity in two aspects: ability to sell products taking into account future changes in quality parameters, and ability to stay in business, i.e. to obtain an Integrated Pollution Prevention and Control (IPPC) permit in line with future emission requirements.



The Company is analyzing polymer-modified bitumen (PMB) production technology in order to manufacture and supply additional grades of polymer-modified bitumen to the market. A project for improvement of crude oil dosing is also being implemented, and Būtingė Terminal SPM buoy is being upgraded. Besides the optimization of feedstock, production mode and production output, the greatest impact on the implementation of this area will be achieved through implementation of the Bottom of the Barrel Project by building a new residue hydrocracking unit (RHCU). RHCU will be integrated into existing process diagram whereas products produced in it will serve as feedstock for other process units of the refinery. Existing process diagram and complexity of refinery produces a considerable amount of heavy fraction (fuel oil), which has a negative margin, declining global demand and value, while the quality requirements are getting stricter. For these reasons the refinery must minimize the production of high-sulphur fuel oil in order to remain competitive.

It is estimated that implementation of this project and availability of new RHCU will allow to increase LPY significantly. RHCU will bring the refinery closer to the level of the world's leading refineries, improve the Company's financial performance, enable more efficient operation across different production modes by optimizing fuel oil output, and ensure long-term competitiveness and business sustainability.

Construction of RHCU is important not only for the refinery but also entire economy and energy security of the region. Over EUR 1 billion will be invested in the construction of RHCU. In 2025, investment amounted to USD 67.9 million.

Chemical recycling

Directive (EU) 2018/850 of the European Parliament and of the Council amending Directive 1999/31/EC on the landfill of waste, sets a target to reduce the amount of municipal solid waste sent to landfills to 10% or less of the total municipal waste generated (by weight) by 2035. The Company is currently analyzing various chemical waste processing technologies, such as waste pyrolysis, waste gasification, and others, with the aim of applying chemical plastic and other waste processing methods at an industrial scale. This is a relatively new direction for the Company however it is seen as having significant development potential.

Production of synthetic fuels and green hydrogen

This direction is new globally, as some markets for synthetic products are still in development and the first pilot plants are emerging. It is also important for the Company on its path of transformation, development of energy generation from renewable sources by leveraging existing infrastructure and accumulated human know-how. European Union regulations (ReFuelEU Aviation) require jet fuel suppliers to blend synthetic fuels into the fuels they supply: their share must reach 1.2% from 2030, then gradually increase to at least 35% of total jet fuel supplied by 2050. This area includes production of green hydrogen by electrolysis, and production of other synthetic fuels, such as aviation fuel, methanol and ammonia. The development of hydrogen is closely linked to future investments in new production capacities, including electrolysis units utilizing renewable energy.

Production of biofuels

As the Company transforms, this direction is also highly important, particularly given that the technologies applied for production of biofuels are sufficiently mature and the products are widely used. European Union regulations (ReFuelEU Aviation) require aviation fuel suppliers to blend biofuels into the fuel they place on the market: starting from 2% in 2025 and progressively increasing to the share of at least 70% of SAF in fuel supplied by 2050. This direction includes production of biofuels such as hydrotreated vegetable oil (HVO) and SAF from the corresponding biomass category. Potential technologies are under analysis. The Company plans to complete its SAF blending infrastructure project in 2026.

Energy - development of renewables

Additional income from the new RHCU will be specifically used for further decarbonization of the Company and development of renewable energy sources in order to achieve the goals set out in the ORLEN Strategy 2035. This direction includes generating electricity from solar and wind power plants. Electricity generation is important for production of green hydrogen, synthetic fuels and biofuels. Availability of cheap and stable renewable electricity, as a key input for future products, will become a significant competitive advantage and will help mitigate risks associated with the transition to low-carbon business model. The installation of 42.2 MW photovoltaic power plant will be completed in 2026. In 2025, wind measurements were carried out to support the development of a wind energy project. In the future, various further development directions aimed at reducing the Company's environmental impact will be analyzed and assessed. The aim is to align the Company's energy consumption with electricity generation from these sources.

Refining - decarbonization

Improving energy efficiency is one of the key ways for the Company to cut GHG emissions in its operations. Initiatives focused on continuous optimization of technological processes, upgrades of industrial equipment, and reduction of energy losses allow to decrease energy consumption and, accordingly emissions. Since 2006, the Company participates in benchmarking study of refineries, where energy consumption is among key areas analyzed. Over the past twenty years, through organizational measures and implementation of relatively small-scale investments and short payback projects energy consumption has been reduced by over 30%. Current energy consumption is below industry average, placing ORLEN Lietuva in the top quartile in the region.

Despite considerable progress, further decrease of energy consumption remains crucial not only in terms of the need to cut costs but also to minimize environmental impact of operations. The Company has mid-term targets in place, implements decarbonization projects and continuously puts efforts to cut energy consumption. Refinery transformation covers modernization of infrastructure, performance improvement, and automation of operations. Modern technologies enhance the precision in control and management processes and this translates into reduces emissions and optimized use of feeds. Digitalization and automation also support operational safety and reduce the risk of failures. New technologies makes allow to reduce the consumption of resources, including water, and increase the use of renewable energy sources.



Currently, the Company is planning to implement multiple decarbonization projects. These projects include such initiatives as low-potential energy recovery, flue gas heat recovery, heat exchange improvement, replacement of steam turbine engine with electric, etc. Main planned decarbonization projects, expected reduction of GHG emissions and implementation timelines are provided further in Table 2.

Table 2. Main decarbonization projects of ORLEN Lietuva

Project	Expected GHG reduction (Kt/year)	Target date
CDU heat exchange optimization	7.61	2028
Replacement of compressor IK-201 and steam turbine	20.48	2029
Installation of new heat recovery boiler KU-401/3	4.34	2032
Utilization of waste heat from SRU for steam production through mechanical vapor recompression (MVR) technology	20.90	2027
Steam generation from refinery waste heat using an industrial heat pump and steam compressors (MVR)	109.05	2030
20 MW Green Hydrogen Production Unit	20.78	2030

The Company’s aim is to reduce GHG emissions by 6% by 2030 vs 2019 level.

By 2030, to achieve a year-on-year reduction in GHG emissions.

In addition to projects listed in Table 2, the Company is increasing bitumen production capacities. ‘Bitumen 555’ project which was started in 2025 and should be completed in Q1 2026 will allow the Company to expand the production of bitumen. Produced bitumen will indirectly contribute to reducing Scope 3 GHG emissions, as this product is not burned but used in asphalt production and the development of other infrastructure. In 2025, the Company allocated USD 6.1 million to this project.

In the same year, the project related to the development of SAF blending infrastructure was further advanced and is planned to be fully completed in 2026. The project is aimed at upgrading existing fuel preparation facilities and enabling the blending of SAF with JET A-1. This initiative is being implemented to comply with European Union requirements for aviation fuels which must have biofuel component. Blending SAF into JET A-1 will contribute to reducing Scope 3 GHG emissions. In September 2025, SAF dosing into the Company’s sold aviation fuel JET A-1 was already initiated. For more information see [here](#).

In addition to the projects listed, other smaller-scale decarbonization initiatives are implemented (see in part about [Climate change](#)).

Total planned reduction in GHG emissions after implementation of all projects listed in the table:

Up to 183.16 Kt/year
(Scope 1 emissions)



Vision 2050 - to become **low-carbon energy producer**

- Biofuel producer
- Synthetic fuel producer
- Green energy, green hydrogen producer (balancing objectives)
- Heat supplier
- Supplier of oxygen, feedstock for fertilizer industry
- Participant of circular economy (recycling plastics and other waste)

Key strategic goals of ORLEN Lietuva for 2035:

- Business excellence (energy consumption reduction)
- CO₂ emission reduction
- SO₂, NO_x, NMVOC emission reduction
- Bitumen production increase, new additional grades
- Sustainable aviation fuel (blending infrastructure+ SAF)
- Own RES (sun + wind)
- Green hydrogen production



ORLEN Group double materiality assessment

As a subsidiary of ORLEN Group, the Company did not carry out a separate double materiality assessment (DMA) as it was performed on a consolidated basis at the entire Group level. The assessment previously carried out in 2025 was reviewed. For more detailed information on DMA conducted by ORLEN Group and its results see [here](#).

The Company, where relevant, made use of this DMA. In the view of the principle of materiality, the report is focusing primarily on sustainability areas prioritized by the Company based on its assessment and information gathered as not all topics considered material at the Group level are as equally material in the context of the Company.

When collecting and reporting ORLEN Lietuva Group data for sustainability information disclosure in consolidated management report for 2025, the Company was unable to provide material information in accordance with the requirements of ESRS E4 (Biodiversity and Ecosystems). For this reason, in 2025 the Company does not consider this ESRS to be material to its operations and has not taken any specific actions in this area. In the future, together with the entire ORLEN Group, it is planned to contribute to biodiversity initiatives through the implementation of a biodiversity action plan currently under development.

ORLEN Lietuva also does not consider ESRS S4 (Consumers and End-users) to be material, as the Company sells its products only in the wholesale market. ORLEN Baltics Retail operating fuel stations in Lithuania is a subsidiary of ORLEN S.A.

Company's sustainability policy and implementation plan

In spring 2025, within the working group coordinating sustainability matters, the issue of developing a sustainability policy for the Company was raised. It should be noted that ORLEN Lietuva already implements a wide range of sustainability-related activities: it reduces its negative environmental impact, takes care of employees, occupational safety and health, and process safety, it has implemented and continues to improve IMS policies, adheres to principles of social responsibility and follows the core values adopted at the ORLEN Group level in the Code of Ethics.

The Company's sustainability policy represents its commitment to systematically shape and develop a sustainable business culture. Its purpose is to define, in a single document, the key principles that are important to the Company, setting out clear commitments and objectives aligned with ORLEN Group policies, the provisions of IMS policy, and the Company's related internal documents and regulations. The Company's sustainability policy is publicly available at <https://www.orlenlietuva.lt> for all interested parties.

To ensure that the sustainability policy is not merely a formal document but is also practically implemented, an implementation plan was developed in parallel in 2025. The plan provides that for each objective or principle requiring additional attention a responsible person, implementation deadlines, and, where necessary, specific indicators are assigned.

The objectives cover the reduction of GHG emissions, development of sustainable product production, improving energy efficiency, reducing NMVOC, nitrogen and sulphur oxide emissions, fostering long-term employee engagement and loyalty, enhancing employee potential and competencies, promoting gender balance, improving a transparent remuneration system, and other areas.

The actions and measures set out in the plan are implemented in accordance with the Company's internal rules and the requirements established therein, including those related to the performance of duties and approvals or endorsements by collegial bodies. The scope of measures defined in the plan may be adjusted if objective circumstances that prevent their implementation as planned arise. Decision concerning adjustment or withdrawal of measures shall be made by the person responsible for the implementation of the Plan, after assessing the impact of such decision on safety, environment and business continuity and documenting the justification for such decision. If circumstances change, the plan shall be revised in accordance with the established document management procedure incorporating the updated actions into it. The plan shall be reviewed and updated at least once a year updating and/or supplementing the planned actions and the desired results (targets) in view of the best practices, significant changes in activities of the Company, decisions of its shareholder, changes in the ORLEN CG strategy or other significant circumstances.

Other information

As EU requirements tighten and Corporate Sustainability Reporting Directive come into force in 2024, in alignment with ORLEN Group strategy, sustainability strategy, and the Company’s further development, the Company continues to focus on sustainability and its importance in environmental protection, social responsibility, and governance areas. In 2025, the coordination of sustainability-related activities continued, including collection of ESG (environmental, social, and governance) and EU Taxonomy data and data required for carbon footprint calculations for the sustainability section of the consolidated ORLEN Group Management Report. This also included consolidating the collected data at ORLEN Lietuva Group level and providing the necessary information to the parent company. Within the Company, ESG and taxonomy coordination functions were performed by a sustainability engineer - a position added in 2024 during the reorganization of the former Technology Department into Strategy, Development, and Technology Department. The provision of data and information required for carbon footprint calculations and communication with ORLEN S.A. representatives was carried out by a process engineer from the same department. To ensure the accuracy and quality of data submitted for the consolidated report, responsible coordinators were appointed across relevant areas within the Company to provide the necessary data.

In 2025, the meetings of working group concerning implementation of sustainability-related activities continued. Three meetings were held in 2025. They were organized on the basis of formal order issued in 2024 regarding establishment of working group for coordinating sustainability matters. The establishment of the working group was important to contribute to the development and advancement of ORLEN S.A. sustainable development strategy, including, but not limited to, the measures defined in the ORLEN Group strategy, monitoring processes, and implementation plans. It is planned to prepare the necessary documents within the Company and adopt decisions to properly coordinate sustainability issues, including, where necessary, setting Company objectives, quantitative and qualitative targets and indicators, and progress evaluation methods.

It is also planned to review EU and national legislative proposals and anticipated changes in the assigned areas of activity, as well as to propose solutions to the Company’s management, Board, and shareholder related to development changes in specific sustainability areas that are relevant at the Company level. The working group is also provided with information from sustainability-related conferences, seminars, articles, reports, and market outlook reviews, and i performs all other duties assigned to it with the order. Where necessary, ESG questionnaires received from suppliers are completed (five completed in 2025).

In the summer of 2025, an ORLEN Lietuva ESG questionnaire was prepared, which is planned to be distributed to the Company’s suppliers via the Connect procurement platform. The suppliers will complete questionnaires on a voluntary basis, and the responses received will be analyzed and summarized to understand the suppliers in ESG context better.

In 2025, the Company, using a sustainability assessment tool managed by Verslo Žinios jointly with Swedbank, evaluated its sustainability index on rekvizitai.lt. The Company’s sustainability index was 9.1 out of 10. The index was calculated based on the Company’s responses to 32 questions (14 of which were mandatory) across four areas: the importance of sustainability within the company, environmental protection, social sustainability, and governance. The responses help reveal the Company’s sustainability policy, the actions taken, and the results already achieved. Responses and attached documents are publicly available for evaluation by all visitors at rekvizitai.lt. In 2026, it is planned to review the submitted information and have sustainability assessment updated.

ORLEN Lietuva

General information

1. Questionnaire completion or revision date

2. Company name

3. Countries of operation

4. Does your Company/Group collect non-financial data related to Environmental, Social, and Governance aspects (ESG)?

Yes, we collect data related to ESG aspects

Currently do not collect such data

We have plans to collect ESG data in the future

Currently we do not plan to collect ESG data

Comments (if needed)

5. Does your Company/Group have Sustainability strategy?

Yes, we have sustainability strategy on a Company level

No, we have sustainability strategy on a Group level

No, currently we do not have sustainability strategy

We are planning to have sustainability strategy in upcoming years

We are not planning to have sustainability strategy

Comments (if needed)

5.1 If you, please attach your Sustainability strategy or provide a link to access the Sustainability strategy.

6. Does your Company/Group have an external ESG rating, for example EcoVadis, etc.?

Yes

No

We are planning to have external ESG rating in the future

We are not planning to have it

6.1 If you, please attach the document (if available). If not, please briefly comment it (what is the reason, etc.)

ESG assessment

1. Does your Company/Group have a formal Environmental protection policy?

Yes, we do

No, we do not

We are planning to have Environmental protection policy in upcoming years

We do not plan to have such policy

Comments (if needed)

1.1 If you, attach a policy (if available online, the link is sufficient)

2. Do you have an Environment management system ISO 14001?

Yes, our management system is certified by ISO 14001

Yes, we are certified by other than ISO 14001 - indicated in comments

No, currently we are not certified by such management system

We are planning to be certified by ISO 14001

We are planning to be certified by other than ISO 14001 - indicated in comments

We do not plan to be certified by any of suitable management systems

Not necessary / not applicable for our activities

Comments (if needed)



AB „ORLEN Lietuva“ tvarumo vertinimas



- Tvarumo svarba - 1.5
- Aplinkosaugos įvertinimas - 2.69
- Socialinio tvarumo įvertinimas - 2.49
- Valdysenos įvertinimas - 2.46



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The company adheres to the principles of social responsibility, actively pursues environmental objectives by implementing modern production technologies and measures aimed at reducing pollution and waste generation.

Environmental protection

Environmental management and policy

The Company recognises that its activities have a significant impact both locally and on a broader scale therefore environmental protection and promotion of sustainable development are an important expression of the Company's social responsibility and its commitment to a sustainable future, particularly in light of the growing challenges related to climate change and depletion of natural resources. In 2025, ORLEN Lietuva adopted ORLEN Group environmental policy approved with Order No. 7/2025/DG of 20 January 2025. The primary objective of the commitments and measures set out therein is to reduce the impact of the Company's activities on environment. Recognizing that environmental protection contributes to improvement of public health, quality of life, and environment, the Company invests in environmentally friendly technologies that help reduce pollution and emissions, promote innovation, and ensure long-term development. ORLEN Lietuva is firmly committed to complying with national, European, and international standards, adhering to applicable environmental protection laws and other regulatory requirements, continuously monitoring legal trends and developments, and conducting its activities in line with the latest requirements and best practices to ensure the highest environmental standards. The Company is also committed to identifying environmental aspects, assessing their impact, determining their significance, and establishing appropriate management principles. In addition, it ensures access to information on environmental impact of its activities to the public, encourages employees to follow a customer-oriented approach at work, protect the environment, improve the quality of work ensuring safe working conditions, and develop employee competencies and environmental awareness (for example, by organizing lectures for employees on relevant environmental topics). The Company seeks to monitor and continuously reduce its impact on human health and the environment, as well as to ensure the timely prevention, response to, and investigation of major industrial accidents.

In addition to the measures mentioned, the Company has committed in its environmental policy to follow established environmental objectives and to conduct its activities in a way that ensures climate change mitigation and adaptation, sustainable use of natural resources (including water), the implementation of circular economy, pollution prevention, and protection of biodiversity. It is also committed to plan investment projects with consideration of their environmental impact, and to implement innovations and new technologies that may have a positive effect on the environment. To continuously improve all areas of its operations and environmental management systems, implement sustainable operating methods, carry out planned actions to achieve established environmental objectives, and monitors progress, conduct environmental studies, research, and programs, develop digitalization of operational processes by improving monitoring and control systems and reducing environmental impact, require contractors to comply with environmental standards, encourage their efforts to reduce environmental and climate impact, raise awareness of ORLEN Group environmental policy, and ensure its effective implementation through employee education and training, promoting environmentally responsible behavior and supporting the idea of sustainable development within local communities.

In its operations, the Company follows principles aimed at reducing GHG emissions, improving energy efficiency, and promoting rational and efficient use of natural resources in line with circular economy practices, reducing waste generation, increasing the use of secondary raw materials and recyclables, and supporting the recycling of products and waste. The Company has committed to reduce consumption of resources, maximize the share of renewable energy sources, improve the efficiency of management of water resources, and enhance wastewater treatment (including closed-loop water use and the reuse of treated wastewater), protect and improve water ecosystems, reduce and control pollution, emissions and releases to air, water, or soil, to protect and preserve biodiversity and ecosystems, and contribute to their restoration.

In the reporting year, the Company continued to strengthen the implementation of its environmental policy, with a sustained focus on pollution prevention, the resource efficiency, and effective management of environmental risks. Consistent implementation of advanced technologies and best available techniques (BAT) has contributed to the mitigation of environmental impacts and compliance with requirements of the applicable legislation. To ensure compliance with all necessary requirements, the Company closely cooperates with the Ministry of Environment of the Republic of Lithuania, Environmental Protection Agency, and the Environmental Protection Department under the Ministry of Environment. The Ministry of Environment develops state policy and organizes, coordinates, and supervises its implementation. Environmental Protection Agency implements measures targeted at environmental protection against air pollution, preservation and improvement of the condition of surface water bodies, performs assessment of pollution and measures to prevent pollution, implements environmental regulation of economic activities. Environmental Protection Department under the Ministry of Environment aims at ensuring lawfulness and legal compliance in the field of environmental protection and sustainable use of natural resources as well as exercises national environmental control and supervision.

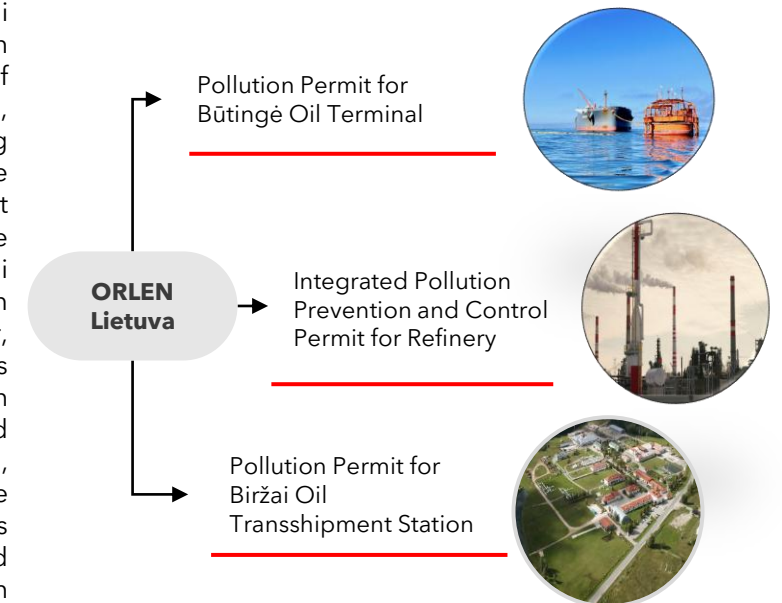
Environmental Control Department of Quality, Labor Safety and Environmental Control Subdivision performs assessments and control of emissions of atmospheric pollutants and ambient air quality, assessment and control of effluents to surface water bodies and quality of surface water bodies, exercises control over ground water and soil contamination, exercises control over use of natural resources, performs GHG monitoring, organizes waste management activities and exercises related control, controls and consults organizational units of the Company. Other organizational units of the Company carrying out their operations in accordance with applicable requirements, conduct operations ensuring the control of permissible pollution levels and implementing pollution prevention measures.

Environmental Control Department conducted analysis of the Company's compliance with the ORLEN S.A. environmental policy. It was determined that the Company's activities comply with provisions, commitments, and principles of this policy.



Environmental activities and process operations are managed in an integrated manner and comply with the international environmental management standard ISO 14001. For more information on IMS policy of the Company see the [website of ORLEN Lietuva](#).

The Mažeikiai refinery operates under an issued Integrated Pollution Prevention and Control (IPPC) permit, while the Būtingė Terminal and Biržai Transshipment Station operate under Pollution Permits. These permits establish a system of operating conditions aimed at preventing, reducing, and, as far as possible, eliminating pollution from industrial activities. They include environmental impact control measures and grant the right to operate the installations. In accordance with the IPPC permit issued for the Mažeikiai refinery, monitoring is carried out for all emission sources releasing pollutants into ambient air, including their impact on air quality. Monitoring is also conducted for pollutants discharged with wastewater, for groundwater, and identified underground oil-contaminated sites. In addition, sites contaminated with petroleum products are being cleaned, and accounting of CO₂ emissions to ambient air is carried out. Utilizing automated emission monitoring system emissions from combustion installations are measured and data analyzed.



Environmental requirements applicable to the Company are set out in Integrated Pollution Prevention and Control (IPPC) Permit, with environmental objectives established in line with the **National Air Pollution Reduction Plan** and **ORLEN CG Strategy**. For each year, Environmental Control Department sets goals and targets. Introducing advanced business administration principles in the environmental area is among goals established for 2025. This goal transforms into the following objectives:

- Cyclic planning and assessment of activities
- Data analysis and decision-making
- Promoting innovations.
- Partnership and cooperation.

To ensure effective prevention of and response to industrial accidents that could be harmful to environment, the Company has required technical basis in place, regularly organizes drills of emergency services, and has third-party liability insurance coverage. Daily LEAN meetings are attended by representatives from the Operations Subdivisions, Strategy, Development and Technology Department, Mechanical Department, QA/QC Center and other organizational units. During these meetings, data on air emissions(CO₂, SO₂, NO_x and particulates) as well as pollutants in treated wastewater released into the environment (BOD₇, total nitrogen, total phosphorus and suspended matter) are presented and reviewed.

The objective of the Company is to maintain continuous oversight and work towards reducing the concentrations (quantities) of pollutants released into the ambient air and discharged through treated wastewater. Monthly reports on air emissions are compiled and analyzed, enabling the identification and implementation of effective solutions to mitigate pollution. Implementation of the management plans for treatment of oil contaminated basins 861-13/3 and 861-14 and soil (2023-2030) is being monitored. Waste Water Treatment Shop is reporting on the progress of implementation of the plan, conclusions are reported to the management of the Company. Management of construction waste is monitored monthly (accumulated quantity is evaluated every month and is reported with IMS indicators). Composition of accumulated waste is visually inspected 2-4 times a year. Quantity of hazardous waste stored in the contaminated soil regeneration site, quantity of hazardous liquid waste in Waste Water Treatment Shop Facilities, quantity of non-hazardous waste handled in Power Plant Sludge Section is monitored monthly to ensure compliance with IPPC permit.

Air Pollution Reduction Plan includes three measures directly applicable to the Company and these measures are currently under implementation.

The first measure concerns reduction of SO₂ emissions and implementation of production upgrades. The technique to reduce SO₂ emissions was selected and agreed with the Environmental Protection Agency (EPA) in 2021. The Company has selected a three-stage catalytic Claus process technique. Three-stage process is intended to improve sulphur recovery efficiency to ≥98.5 wt.% and ensure a high level of environmental performance as emissions hazardous to environment will be reduced.

Reduction target for 2030 vs 2005:

- **- 60% of SO₂ emissions;**
- **- 51% of NO_x emissions;**
- **- 47% of NMVOC emissions.**

In 2025, no environmental complaints have been received from external parties or in-house staff.

During ISO 14001 external audit conducted in 2025, no environmental non-compliances identified.

Objective of the Company - 0 environmental violations.

Another measure applicable to the Company concerns reduction of NMVOC in processes of the Company. Since 2019, the Company performs monitoring of NMVOC emissions from the entire refinery. The risk-based leak detection and repair program has been prepared for prevention and reduction of diffuse NMVOC emissions and reduction of actual emissions to atmosphere. Additionally, the Procedure for Detection of NMVOC has been developed and approved in compliance with both US and European regulations and standards. This procedure outlines methods for NMVOC detection, specifies the scale of potential leaks, and establishes corresponding response procedures. Measurements for the Company are performed by an accredited laboratory. In 2025, 14,631 measurements were performed and 22 leaks detected (vs 15,086 measurements and 17 leaks in 2024). Leaks were eliminated according to established procedure.

The third measure concerns improvement of NMVOC emissions accounting in crude oil refining industry. Integrated measurement of NMVOC emissions since 2022 is based on instrumented measurements and calculations, where possible, based on the European Environment Agency's methodology EMEP/CORINAIR for accounting emissions. The Company is conducting experimental air emission calculations using the European Environment Agency's methodology for emission accounting in an effort to change the current measurement method.

In 2025, the Company continued monitoring nickel and vanadium emissions into the environment and emissions of polychlorinated dibenzo-p-dioxins and furans from FCC unit. Periodic monitoring of drinking water quality, accounting of water intake and treated/discharged wastewater, analysis of pollutants in discharged wastewater, calculations and analysis of the indicators according to IMS process descriptions, Employee Environmental Engagement Program were conducted as well.

Environmental control in Būtingė Terminal and the Baltic Sea

Būtingė Terminal applies advanced techniques, including oil leak detection system. Based on environmental impact assessments conducted by international companies and Lithuanian scientists, a strict environmental monitoring program has been approved, under which continuous environmental monitoring of the Būtingė Terminal is carried out. In accordance with the Pollution Permit issued for the Būtingė Oil Terminal, emissions released into ambient air from pollution sources, pollutants discharged with wastewater, impacts on groundwater, and impacts on the Baltic Sea (hydrological, hydrogeochemical, hydrobiological, ichthyological, and coastal zone) are monitored.

Monitoring of the impact on the Baltic Sea is carried out by determining the impact of the Būtingė Oil Terminal's operations on the Baltic Sea. To ensure an impeccable response to potential pollution incidents at sea, the following measures are implemented at the Terminal:

- two tugboats with oil spill containment equipment servicing the Terminal to ensure efficient containment and recovery of oil spills;
- periodical drills in the Baltic Sea with national pollution response forces;
- annual exercises and trainings held in Būtingė Terminal every year with participation of employees and emergency response forces exercising to efficiently and promptly respond to any marine incident.



Information on environmental impact assessments and screening for environmental impact assessments

In 2025, no new environmental impact assessments were carried out – only one screening for an environmental impact assessment was conducted for a planned economic activity in the Baltic Sea, within Lithuania's territorial waters, in the offshore part of the Būtingė Oil Terminal near Būtingė, approximately 7 km from the shore. It was planned to assess the existing single-point mooring buoy system of the Būtingė Oil Terminal, together with all associated equipment (the buoy, floating hoses, subsea hoses, the buoy anchoring system (anchor chains and anchors), the tanker mooring line and mooring chain), and to adapt it for servicing tankers with a deadweight of 165,000 t. After the assessment, it was determined that the implementation of the planned economic activity will not have a significant adverse impact on protected areas, habitats of protected species, or natural habitats. At the location of the planned activity and in its surroundings, there are no state reserves, national or regional parks, protected areas, sites of the European ecological network Natura 2000, or other protected territories, and no occurrences or habitats of protected species have been recorded. The nearest protected area, located 6.7 km from the site, is the Baltic Sea thalassological reserve.

Following the implementation of the planned economic activity, the total annual cargo throughput of the Būtingė Oil Terminal will not change, nor will the Terminal's design capacity, the maximum allowable pressure in the offshore pipeline, or the operating flow rate be altered. The planned activity is not expected to have a significant negative impact on the seabed of the Baltic Sea or on the natural habitats present there. In order to minimize the impact on natural habitats, any potential replacement of the buoy system anchors would be carried out at the locations of the anchors currently in use. The implementation of the planned economic activity will not have a significant negative impact on the environment or public health, as the location is not associated with wastewater, odor, air, or noise pollution, and no construction (dredging) works will be carried out during the activity. Following the screening for environmental impact assessment, it was concluded that the environmental impact assessment for ORLEN Lietuva's planned activity (the adaptation of the Būtingė oil terminal buoy system to service tankers with a deadweight of 165,000 tons) is not mandatory.

Environmental Permits and Regulatory Compliance

In 2025, the relevant applications were submitted by the Company to the Environmental Protection Agency and amended permits were received for the newly planned projects, including those related to conversion capacity increase (BoB) project, modernization of infrastructure, and SAF blending into JET A-1. As since 2025, Būtingė Terminal transfers industrial waste to UAB Palangos Vandenys, Pollution Permit for Būtingė Oil Terminal was amended accordingly with special part on wastewater treatment withdrawn from it.

Needs and expectations of interested parties (stakeholders), including compliance obligations and environmental control

In 2025, no non-conformities or environmental violations were identified in the activities of Environmental Control Department. Inspections by relevant state authorities performed in the Company in 2025 did not identify any violations. The number of inspections performed: 7 in refinery, 2 in Būtingė Oil Terminal, 1 in Biržai Oil Transshipment Station.

Key environmental regulations and procedures

In addition to the Company's environmental monitoring programs, which form part of the Integrated Pollution Prevention and Control and Pollution Permits, as well as the ORLEN CG environmental policy (discussed earlier), the Company also follows other procedures and rules relevant to environmental protection. This voluntary report discusses the main of them. They are periodically reviewed and updated.

In-house **Rules on Waste Management**. The purpose of the Regulations is to define the process of waste management at the Company aimed at ensuring that the waste management related activities are focused on mitigation of any negative effects of waste on the environment and implementation of the waste management principles. The Rules establish the procedure for sorting, collection, labelling, coding, shipment, temporary storage of waste generated in the territories of the Company, its transfer to waste managers, also recycling, and disposal as well as the procedure for waste generation and management accounting and reporting. The Rules are binding upon all employees of the Company and its suppliers performing civil construction, maintenance and other works or supplying services for the Company under respective contracts.

In-house Rules on Verification and Monitoring of CO₂ Emissions define CO₂ accounting and monitoring process and is a part of the Company's annual GHG emissions monitoring plan. The Rules define the obligations and responsibilities related to CO₂ accounting and monitoring, the methodology for calculating CO₂ emissions generated during combustion and production processes, as well as the procedures for data verification and storage.

In-house Product and Packaging Accounting Rules regulate the identification and registration (accounting) of the Company's products and packaging, the methodology for determining weight, and the submission of relevant reports through the Product, Packaging and Waste Accounting Information System (GPAIS).

In-house Regulations on Identification of Environmental Aspects and Determination of their Significance define provisions on the basis of which environmental aspects are identified and reviewed, their impact and significance is determined and environmental impact is assessed. Legal and other requirements applicable to environmental protection aspects are also defined, significant environmental aspects are assessed, and Company employees are informed about them. When identifying environmental aspects related to the Company's activities, a life cycle perspective is taken into account, including the goods and services used and the products placed on the market over which the Company can exert influence.

Wastewater Management Reporting Rules establish the Company's wastewater management accounting procedures, including the determination of wastewater quantity and quality, the methodology for calculating pollutant loads, average concentrations and wastewater treatment efficiency, the actions to be taken when permitted pollution levels in discharged wastewater are exceeded, and the specific requirements for reporting. All indicators regulated by the legislation applicable to the refinery and by the IPPC Permit are provided in the wastewater management accounting records.

The purpose of Provisions for Employee Motivation in the Environmental Sustainability Area is to encourage employees of ORLEN Lietuva to protect and pursue sustainable use of environmental assets, apply the principles of sustainable and environmentally-friendly behavior in their activities aimed at minimizing the potential adverse environmental effects of such activities, as well as identify those organizational units and employees of the Company who have achieved the highest environmental performance indicators by motivating them accordingly. The Provisions define the methodology for calculating results and describe the indicators to be assessed, how winners are selected, and what incentive measures are applied.

It should be noted that the Company uses the Magique Galileo risk management system (this system and the related Risk Management Regulations are described in more detail in the **Governance Section**). The system contains identified risks, which also include those related to environmental protection. The identified risks are managed accordingly.



Climate change

Company's GHG emission reduction plans

Climate change is one of key strategic challenges with a fundamental impact on the long-term resilience, competitiveness and value creation of the ORLEN Group, as well as the Company. In 2020, ORLEN Group, including ORLEN Lietuva, committed to achieving climate neutrality by 2050. This commitment is confirmed in the ORLEN 2035 strategy, which sets a clear long-term direction for transformation.

Together with ORLEN Group, the Company is developing interim GHG emission reduction targets. These targets are pursued through targeted investments and actions aimed at reducing emissions and driving positive change across the entire value chain. Targets are discussed in detail in **Strategy Section**. Renewable energy projects are being implemented. One of them is the installation of four solar power farms with a total capacity of 42.2 MW. The project is described in more detail in **Energy Sub-Section**. In 2025, the first stage of the onshore wind farm project was also under development. An agreement was signed for the further development of the project, wind speed measurements and an economic assessment were carried out, activities related to the environmental impact assessment were conducted, and the scope of works for the wind farm was prepared. In 2026, it is planned to secure financing for the second stage of the project, with the project itself expected to be implemented by 2030. The electricity generated is intended to be used for the plant's needs, with part of it to be supplied to the Lithuanian electricity grid.

In 2025, two decarbonisation projects were implemented: an additional high-efficiency Packinox type heat exchanger was installed in Catalytic Naphtha Reforming Unit. In 2025, USD 7.8 million was allocated to this project, while the total project cost amounted to USD 8.3 million. The implementation of the project will enable a reduction of CO₂ emissions by up to 11.65 thousand tons per year.

The effect has been assessed for a full year of operation based on actual data available during the reporting period and depends on the production mode.

In addition, the naphtha hydrotreatment heat exchanger modification project was completed at the end of 2025, with eight new heat exchangers brought into operation. Following the implementation of the project, equipment efficiency was increased and CO₂ emissions were reduced. Based on the available actual data, the reduction in CO₂ emissions for a full year of operation amounts to up to 19.7 thousand tons per year. Previously, it had been estimated that the reduction would be 5.6-8.9 thousand tons per year, depending on the production mode.

Other decarbonization projects are also being further developed. It is planned to optimize heat exchange in Crude Distillation Unit (CDU). In 2025, the internal technical proposal was updated, technical and commercial evaluations of long-lead equipment were carried out, and materials are being prepared to secure project financing. A project is also being developed to replace the existing compressor and steam turbine with a new electrically driven compressor. This would reduce fuel consumption, steam usage, and CO₂ emissions. The annual reduction in CO₂ emissions would amount to approximately 20.5 thousand tons. In 2025, a tender was organized, several proposals were received and technically evaluated, but none met the Company's requirements. Additional economic indicators were reviewed, and discussions were held regarding further development possibilities for the project. It is also planned to utilize waste heat by installing an additional waste heat recovery boiler. This solution is expected to reduce Scope 1 CO₂ emissions by approximately 4.34 thousand tons per year. During 2025, tenders for long-lead equipment were completed, materials for project financing were prepared, and the technical and commercial evaluation of the EPC tender was carried out.

The project was originally planned to be implemented during the nearest Turnaround in 2027 however, the timeline has been postponed to the next turnaround due to unresolved technical issues related to determining appropriate operating parameters after installation of the equipment.

In 2025, two projects related to utilization of waste heat for steam generation were initiated, involving the use of an industrial heat pump and MVR compressor. The annual reduction in CO₂ emissions is estimated at approximately 109.1 thousand tons. A similar project is also planned for Elemental Sulphur Production Unit. It envisages using residual heat for steam generation by installing vapour recompression systems (MVR), reducing CO₂ emissions by approximately 20.9 thousand tons per year. Project managers have been appointed for these projects, and tenders have been launched to select contractors for further development. Technical and commercial evaluations of the received proposals are being carried out.

In 2025, intensive work continued on the development of a green hydrogen production project, which during the reporting period remained at the planning stage. Contractor selection tenders were conducted, technical and commercial evaluations of proposals were carried out, and documentation to secure financing was prepared. Currently, for technological processes, the Company produces grey hydrogen, i.e. hydrogen obtained through the steam reforming of hydrocarbon gases combined with CO₂ adsorption. In the first stage, it is planned to install a 20 MW electrolyzer. It is estimated that, over a full year of operation, CO₂ emissions will decrease by approximately 20.8 thousand tons.

During the reporting period, a project was also being developed to upgrade the existing fuel preparation units and enable the blending of SAF with JET A-1. This initiative aims to comply with EU requirements for aviation fuel by incorporating a biofuel component not derived from fossil sources. The project is planned to be completed in June 2026.

In 2025, the Company carried out the installation of infrastructure for blending SAF with Jet A-1 fuel, allocating USD 7.0 million to this project. The total project value amounts to USD 8.3 million. Upon completion of the project, it will be possible to blend aviation fuel produced from crude oil with SAF.

ORLEN Lietuva begins supplying SAF in the Baltic States

In September 2025, SAF was first time introduced to the Baltic markets by the Company. This is a significant step towards the decarbonization of the aviation sector.

Currently, ORLEN imports SAF components—some of which are produced in Rotterdam (the Netherlands), and others in Singapore. 2025 marks the first year in which SAF has been widely used in Europe for commercial purposes, rather than only in experimental programs.

By starting to supply SAF, ORLEN is also implementing the requirements of ReFuelEU Aviation regulation. According to this regulation, from 2025, sustainable aviation fuels must account for at least 2% of all aviation fuels supplied. The regulation applies to European Union airports that handled more than 800,000 passengers or 100,000 tons of cargo in the previous year. This initiative also helps prepare for further targets as by 2030, the share of SAF must reach 6%, and by 2050, as much as 70%.



The Company has also invested in projects aimed at ensuring equipment safety and continuity of technological processes. Work was carried out to upgrade other key process equipment at the refinery, such as the installation and repair of thermal insulation in process facilities of the refinery (the estimated CO₂ emission reduction in 2025 amounts to 1,305 tons per year), the disconnection of steam-condensate pipelines of the Bitumen Production Unit from platform No. 4 (CO₂ savings of 114.9 tons per year), and others. The use of certified bio-additives also contributes to reducing CO₂ emissions.

Company's goal 2025:

Aim to reduce GHG emissions

Objectives 2025:

- To seek to reduce GHG emissions by 6% by 2030 compared with 2019 level.
- Achieve a year-on-year reduction in CO₂ emissions during the period of 2025 to 2030.

ORLEN Lietuva - monitoring and accounting of GHG emissions

93 Lithuanian companies participate in the European Union Emissions Trading System (EU ETS). One of them is ORLEN Lietuva. By participating in this system, the Company is required to carry out monitoring and accounting of GHG emissions and to prepare an annual report on the amount of GHG emissions for the previous calendar year. In addition, each year it must declare refinery process performance data.

Performance assessment and declaration are very important, as the amount of free emission allowances allocated depends on changes in performance. When the absolute value of difference between the average performance level and that of the previous period exceeds 15%, the number of free emission allowances allocated is adjusted. All these processes must undergo independent audit annually.

CO₂ accounting carried out by the Company for 2025 in accordance with the written procedures approved in GHG monitoring plan was assessed for 2025 by the independent verifier UAB Bureau Veritas.

Auditors also verified the 2025 performance report and the related data presented therein. According to the audited data, the difference between the average performance level in 2025 and that of the previous period was 8.8%. As the absolute value of the difference did not reach 15%, the amount of free emission allowances allocated to the Company in 2025 was not adjusted and remained as approved by the competent authority, i.e. 1,227,969 allowances.

Independent verifier confirmed that the Company's actual CO₂ emissions in 2025 amounted to 1,689,963 tons, which is 84,505 tons higher than in 2024.

2024 - 1,605,458 tons

Calculations are performed in accordance with Commission Implementing Regulation (EU) 2018/2066 of 19 December 2018 on the monitoring and reporting of greenhouse gas emissions pursuant to Directive 2003/87/EC of the European Parliament and of the Council and amending Commission Regulation (EU) No. 601/2012. Audited in accordance with Commission Regulation (EU) 2018/2067 on the verification of data and accreditation of verifiers pursuant to Directive 2003/87/EC of the European Parliament and of the Council.

Scope 1, 2 and 3 GHG emissions

On 17 December 2025, Order No. TV1(1.2-1)-2025-0465 approved the application of ORLEN Group Guidelines No. 1/OE/2025 on the preparation and submission of data required for calculating the ORLEN Group's carbon footprint at ORLEN Lietuva. These guidelines were prepared by the parent company to establish the principles for preparing and submitting data required for calculating the ORLEN Group's carbon footprint, the procedures for verifying calculation results, the scope of disclosed results, and to define responsibilities and principles of cooperation.

The calculation of Scope 1, Scope 2, and Scope 3 carbon emissions was carried out in accordance with the guidelines and standards of the GHG Protocol.

- GHG Protocol Corporate Standard (Scope 1);
- GHG Protocol Scope 2 Standard.
- GHG Protocol Scope 3 Standard.

Guidelines specific to the oil and gas sector, prepared by the American Petroleum Institute (API), the International Petroleum Industry Environmental Conservation Association (IPIECA), and the International Association of Oil & Gas Producers (IOGP), were also used in order to reflect the specific characteristics of emissions in the sector.

Information on the Company's GHG emissions on a location-based basis is presented in the context of the entire ORLEN Group, i.e. excluding internal flows within the ORLEN Group (Table 3). Table 4 summarises the Company's Scope 3 GHG emissions by individual material categories defined in the GHG Protocol.

Table 3. Scope 1, 2 and 3 GHG emissions (location-based)

ORLEN Lietuva GHG emissions			
	2019 - base year	2024	2025
Scope 1 emissions, tCO ₂ e	1,666,971.91	1,665,767.51	1,755,019.70
Scope 2 emissions, tCO ₂ e	0.00	0.00	5,098.58
Scope 3 emissions, tCO ₂ e	34,045,643.40*	26,270,768.82	29,317,442.51

Total Scope 1 , Scope 2, Scope 3 emissions (location-based) in 2025 amounted to 31,077,560.79 tCO₂e.

(2024 - 27,936,536.33 tCO₂e).

Table 3 contains only significant Scope 3 GHG emissions.

Table 4. Scope 3 GHG emissions by category

Category	Scope 3 category	Scope 3 CO ₂ emissions (tCO ₂ e)		
		2019 - base year	2024	2025
Category 1 (C1)	Purchased goods and services	5,330,194.38	2,749,160.27	2,845,689.36
Category 2 (C2)	Capital goods	379,139.80*	201,246.57	244,784.55
Category 3 (C3)	Fuel- and energy-related activities (not included in Scope 1 or Scope 2)	134,247.30	211,095.08	33,250.98
Category 10 (C10)	Processing of sold products	176,975.71	275,295.02	521,035.73
Category 11 (C11)	Use of sold products	28,025,086.21	22,833,971.88	25,672,681.89

* provisional value

Product carbon footprint

For the first time, the carbon footprint of the Company's products (PCF) was calculated in 2024, using 2023 data. In 2025, it was calculated accordingly based on 2024 data. In the first year, PCF was determined for 35 products, and certificates confirming this were issued. In 2025, PCF was calculated for 32 products.

PCF calculations were performed by the Company's designated employees, and their verification, at the Company's request, was carried out by the company DGE. The calculations cover GHG emissions over the entire product life cycle - from raw material extraction, transport and production, to distribution, use and end-of-life treatment. The applied methodology enables a systematic and quantitative assessment of climate impact, with a focus on technical systems.

The calculations were carried out in accordance with ISO 14067:2018. Life cycle assessment software SimaPro 9.5 was used, with the main database being Ecoinvent 3.9, applying the LCA method IPCC 2021 GWP100. Emissions for final products were allocated using a mass-based approach. For each process unit, the total GHG emissions were calculated as the sum of emissions related to energy consumption and material inputs (crude oil, intermediate products, additives). The quantities were allocated proportionally based on the mass of output streams, excluding process losses.

To account for differences in the energy content of products, a minor adjustment was applied using an energy-based index. This ensures consistency with mass and energy balances while maintaining the overall level of emissions within the system boundaries.

All aggregated information on the Company's PCF is presented in Table 5. The calculation results are presented in two ways: from raw materials to the gate up to the point of product production, excluding the use and end-of-life stages (cradle-to-gate), and from raw materials to the end of the life cycle (i.e. complete combustion, disposal, or other use) (cradle-to-grave). According to the data presented in the table, the highest carbon footprint among the Company's products is associated with gasoline A-98, while the lowest footprint is found in granulated gaseous technical sulphur.

Table 5. Company's PCF summary

Product	Cradle to gate (tCO ₂ e/t product)	Cradle to grave (tCO ₂ e/t product)	Cradle to gate (tCO ₂ e/t product)	Cradle to grave (tCO ₂ e/t product)
	y2024	y2024	y2023	y2023
Gas and petrochemical feedstock				
Auto LPG*	0.63	3.57	0.59	3.53
Household and commercial LPG, BT grade	0.49	3.43	0.45	3.39
Household and commercial LPG, SPBT grade	0.59	3.53	0.59	3.53
Propylene	N/A	N/A	0.51	3.44
Gasoline and gasoline components				
Gasoline A-95	0.61	3.76	0.56	3.71
Gasoline A-98	0.71	3.86	0.64	3.80
Gasoline E-95 with bioethanol	0.62	3.43	0.58	3.40
Gasoline RBOB 93.5	0.57	3.72	0.54	3.70
Gasoline US-92	0.60	3.75	0.56	3.72
Isomerizate	0.44	3.59	0.41	3.56
Oligomerizate	N/A	N/A	0.72	3.88
Reformate	N/A	N/A	0.47	3.63
MTBE	0.67	3.82	0.65	3.80
Reformer feed	N/A	N/A	0.36	3.51
Diesel				
Diesel grade C	0.43	3.64	0.39	3.59
Diesel grade E	0.44	3.64	0.39	3.60
Diesel grade F	0.42	3.62	0.39	3.59
Arctic diesel grade A0	0.43	3.64	0.40	3.60
Arctic diesel grade A1	0.45	3.65	0.41	3.62
Arctic diesel grade A0	0.42	3.62	0.39	3.59
Biodiesel (grade A1 with HVO)	0.41	3.41	N/A	N/A
Biodiesel agriculture	0.53	3.51	N/A	N/A
Biodiesel (grade C)	0.48	3.46	0.46	3.44
Biodiesel (grade E)	0.50	3.49	0.48	3.47
Biodiesel (grade F)	0.49	3.47	0.46	3.45
Biodiesel (grade E) with HVO	0.39	3.39	N/A	N/A
Biodiesel (grade F) with HVO	0.42	3.42	0.41	3.41
Biodiesel for cargoes	0.51	3.49	0.48	3.47
Diesel agriculture with HVO	0.44	3.45	0.42	3.42
Diesel for cargoes with HVO	0.44	3.45	0.43	3.43
Heating oil	0.41	3.58	0.38	3.55
Marine gasoil (DMA)	0.41	3.65	0.38	3.63
Other products				
JET A-1	0.39	3.58	0.36	3.56
Bitumen	0.36	0.48	0.33	0.46
Fuel oil M-100	0.48	3.71	0.46	3.68
Granular gaseous technical sulphur	0.27	0.30	0.27	0.28

* Liquefied petroleum gas



Energy

The Company has a Power Plant operated since 1979 which provides heat, steam, chemically treated water for the needs of the refinery. Electricity generated in Power Plant is used for in-house needs, part of it is supplied to national grid. The voluntary report does not provide information on key energy production and consumption indicators such as natural gas consumption for fuel, liquid fuel consumption, thermal energy produced from non-renewable and renewable energy sources, total electricity purchased, electricity generated, etc. for the reporting period due to the lack of permission from the data owners to publicly disclose such data. Consolidated data on energy consumption is presented in the consolidated Management Board's Report.



In 2025, as in 2024, the Company sourced its consumed electricity from renewable energy sources. This is evidenced by respective statements of origin confirming that electricity was generated using renewable energy sources: No. P-846, P-850, P-853, P-855, P-856, P-860, P-861.

Energy consumption audits are also conducted at the Company. During these audits, energy consumption and losses in core, auxiliary and utility processes are assessed, and balances of energy resources, energy, water and raw materials are prepared. At the end of the audit report, technical and organizational measures for reducing energy consumption are proposed.

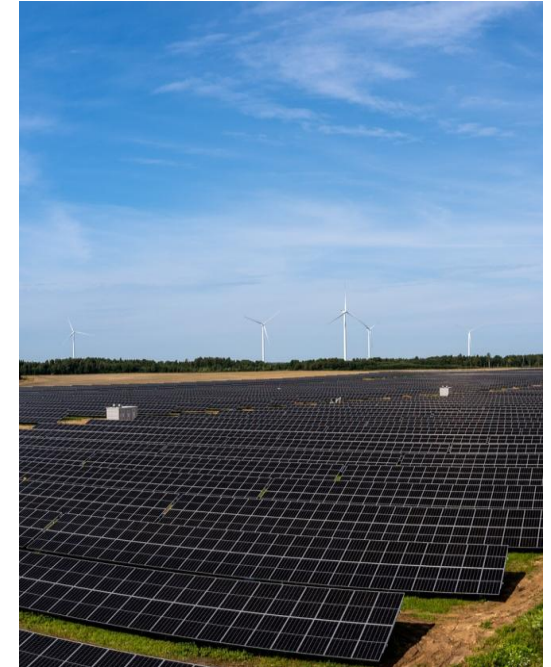
ORLEN Lietuva invests into solar energy

In 2025, the Company continued the solar power plant construction project, allocating USD 30.9 million to it in 2025. The total approved project budget amounts to USD 40.4 million. Upon installation of the 42.2 MW photovoltaic solar power plant, approximately 45 GWh of electricity is expected to be generated annually. It is projected that the Company's annual electricity procurement costs will decrease by approximately USD 4.7 million. This is an important step towards more sustainable operation, strengthened energy self-sufficiency and resilience in a changing energy environment. The investment is also significant in implementing the Group's broader commitments to develop low-carbon and zero-emission energy solutions. The solar power plant is scheduled to be commissioned in mid-2026.

The photovoltaic (solar) plant will be installed on the refinery site and divided into four main farms. The total area of the solar plant will cover 60 hectares and will include approximately 68 thousand bifacial solar modules, each with a capacity of 620 Wp. These modules absorb sunlight from both sides, ensuring higher efficiency, including under lower light conditions.

The electricity generated will be used exclusively to meet the needs of the refinery, including supplying energy to buildings and critical infrastructure. As one of the largest industrial energy consumers in the Baltic States, the refinery will reduce its environmental impact and become less dependent on fluctuating energy prices. This is a flagship project in the operations of ORLEN Lietuva. Renewable energy will be generated for the first time, helping to ensure the operation of one of the largest energy consumers in the region. An advanced energy management system will be implemented at the facility, integrated with a modern medium-voltage switchgear. This will ensure efficient energy distribution, reliable operation, and safe functioning in an industrial environment.

The project includes the design and construction of the solar plant, obtaining the necessary permits, developing the plant's infrastructure, and installing a 6 kV connection with cable routes within the refinery site. Construction works are being managed by the contractor Electrum, based in Białystok.





Pollution

The Company's activities, including oil refining and combustion processes, are associated with environmental impacts, particularly pollutant emissions. The main pollutants released by the Company into ambient air are sulphur oxides, nitrogen oxides, carbon monoxide, and NMVOCs. Other pollutants are also emitted, such as benzene, toluene, xylene, hydrogen sulphide, ammonia, methanol, ethanol, manganese oxides, methyl tert-butyl ether, and others. Tightening EU and national requirements may lead to new obligations for the Company's operations and the need to comply with even stricter emission limit values for existing production installations. This may have a direct impact on increasing operating costs.

In carrying out its activities, the Company seeks to reduce its environmental impact and actively manage pollution-related risks. Investments are made in equipment, and recommended emission-reduction technologies are implemented, helping to mitigate other negative environmental impacts of the Company's operations. Hazardous substances are gradually being replaced with alternative solutions. Strict incident response and spill management procedures are in place. The Company consults with all interested groups (stakeholders) on the environmental impact issues.

To ensure effective corrective actions, the Company also applies other preventive measures, such as regular maintenance and repair of existing equipment. The Company has implemented an Integrated Management System Policy, conducts internal audits and certifications, maintains environmental liability insurance, and evaluates environmental remediation requirements for soil restoration. In 2025, no pollutants were released into the soil during the normal operation of the facilities. Soil contamination may occur only as a result of unforeseen emergencies or incidents.

Like other companies within the Group, the Company monitors pollution levels and carries out air emission measurements as well as soil, water, and wastewater testing through accredited laboratories. The scope and methods of pollution monitoring comply with applicable legal requirements and are performed in accordance with standardised methodologies.

The air pollution assessment methodology is defined in the environmental monitoring program. Where direct measurements are not feasible or where the obtained results are unreliable, pollution levels are assessed using calculation methods. Through the use of the Automated Monitoring System (AMS), the Company complies with the requirements of EU Directives 2001/80/EC and 2010/75/EU, as well as Implementing Decision 2014/738/EU, regarding the monitoring of emissions from large combustion plants, process units, and catalytic cracking units. AMS ensures the determination and recording of aggregate concentration values for SO₂, NO_x, and particulate matter. The quality of AMS is ensured in accordance with the provisions of the LST EN 14181 standard. The following parameters are measured in facility stacks and chimneys: concentrations of gaseous pollutants (CO, NO_x, and SO₂), oxygen concentration, particulate matter (PM) concentration, flue gas temperature, absolute flue gas pressure, and flue gas flow rate. The obtained results are used to evaluate operational processes and, where necessary, implement corrective measures. The Company also fulfills its annual obligation to submit pollutant emission reports to the competent authorities. Monthly AMS data are provided on the Company's [website](#).

Furthermore, groundwater monitoring, monitoring of underground oil-contaminated sites and their decontamination in the territory of the refinery as well as pollution prevention performance were continued.

ORLEN Lietuva - environmental violations

No environmental compliance violations attributable to incidents occurring within the Company were recorded in 2025.

(in 2024 – 2 violations).

Environmental monitoring



Environmental Analysis Group of Quality Assurance/Quality Control Center performs environmental monitoring using modern equipment. **In 2025, over 10 thousand tests were performed.**

Table 6. Scope of environmental monitoring

	Number of analyses in 2025	Number of analyses in 2024	Change
Monitoring air emissions from designated sources	7,310	6,109	+1,201
Monitoring wastewater discharges from pollution sources	1,230	1,250	-20
Environmental monitoring for Būtingė Oil Terminal	170	152	+18
Monitoring effects on ambient air quality	624	624	0
Monitoring the impact on water	1,248	1,248	0
Environmental monitoring for Biržai Oil Transshipment Station	60	60	0
Total:	10,642	9,443	-

A total of 136 environmental testing methods were used to perform the analyses in 2025 (134 methods in 2024). In addition, 276 pieces of advanced equipment were used, including gas chromatographs, spectrometers, gas, oxygen and petroleum product analysers, as well as titrators, pH, temperature, humidity and velocity meters, and other instruments used for the control and monitoring of pollution sources (274 pieces of equipment in 2024).



Groundwater monitoring

The Company performs groundwater monitoring. The results are annually presented to EPA and Lithuanian Geology Survey under the Ministry of Environment. There are 72 monitoring points in total:

- 60 monitored wells;
- 5 drinking water wells;
- 7 hydrological stations.

Periodicity of analysis: during spring thaw (April-May) and dry season (August-September). During the analyses, various parameters are determined, including groundwater level, chemical composition, aromatic hydrocarbons, the content of aromatic hydrocarbons and petrol-range hydrocarbons (C₆-C₁₀) as well as diesel-range hydrocarbons (C₁₀-C₂₈), petroleum hydrocarbon index (C₁₀-C₄₀), total iron content, and heavy metals.

Monitoring of underground soil contaminated with oil products, pollution prevention

Continuous monitoring and remediation activities are carried out within the refinery in identified contaminated areas, including rail loading rack-kerosene tank area and gasoline tank farm. The groundwater level and quality, as well as the accumulation of free-phase petroleum product (FPP) on the groundwater surface, are monitored in the remediated contaminated areas, with a focus on identifying locations and patterns of the greatest variation. Accumulations of FPP that collect on the groundwater surface are removed through recovery and pumping operations.

Monitoring results indicate that the thickness of the free-phase petroleum product layer in the contaminated areas decreased slightly in 2025 vs 2024. According to publicly available information presented in AB ORLEN Lietuva Management Report 2025, 3.38 tons of FPP were recovered from contaminated areas in 2025 (3.78 tons in 2024), and pollution prevention measures will continue to be implemented in 2026.

Soil monitoring

Within the oil refinery site, soil monitoring is conducted once every four years. The next monitoring campaign is scheduled for 2026. Monitoring is carried out at eight monitoring points. Laboratory testing of soil samples is performed in accordance with the requirements specified in the environmental monitoring program.

Air pollution

Production volume growth led to changes in emissions

Production intensity directly correlated with the increase in emissions. In 2024, the Company processed 8.84 million tons of crude oil, while in 2025 the volume increased to 9.4 million tons. Compared with 2024, refining volumes in 2025 increased substantially, primarily due to economic factors. Refining operations were optimized with regard to macroeconomic conditions, global crude oil and petroleum product prices, demand in local markets, and other relevant factors. As 6% more crude oil was processed in 2025, the increased demand for electricity generation resulted in 35% higher liquid fuel consumption. The rise in emissions was driven by higher liquid fuel consumption, increased refining throughput, and fluctuations in the fuel combustion process. At the same time, gas consumption decreased by 13%. Total emissions attributable solely to the refinery amounted to 14,002 tons, representing an increase of 981 tons vs 2024.

Total pollutants during reporting year increased by 7.5% vs 2024. The majority of this increase resulted from higher emissions of sulphur dioxide (SO₂), nitrogen oxides (NO_x), and particulate matter (PM). Although NMVOC emissions decreased compared with the previous reporting period, the overall increase of 981 tons was primarily driven by the higher intensity of fuel combustion.

Compared with the 2019 baseline, the Company has established the following environmental objectives to be achieved by 2030:

- Achieve a **6% reduction in GHG emissions** by 2030;
Achieve a year-on-year reduction in CO₂ emissions during the period of 2025 to 2030;
- Achieve a **47% reduction in NMVOC emissions** during the period of 2025 to 2030;
- Achieve a **15% reduction in NO_x emissions** during the period of 2025 to 2030;
- Achieve a **31% reduction in SO₂ emissions** during the period of 2025 to 2030.

Table 7 presents data on permitted emission limits and actual annual emissions for 2025, compared with the previous reporting period. The data also include the Company's operating units, specifically the Būtingė Terminal in relation to air emissions. All values are reported to two decimal places.

Table 7. Emissions in 2025 and comparison with the previous reporting period

Name of pollutant	Permitted for refinery under IPPC Permit, t/year [1]	Permitted for Būtingė Terminal under Pollution Permit, t/year [2]	Total permitted levels, t/year [1] + [2]	Actual pollution 2025: refinery + Būtingė oil Terminal, t/year	Actual pollution 2024: refinery + Būtingė oil Terminal, t/year	Change, t
Particulate matter	221.33	0.02	221.36	64.83	38.40	+26.43
Nitrogen oxides	2,067.01	0.09	2,067.11	1,344.88	1,025.55	+319.33
Carbon monoxide	3,768.46	0.62	3,769.08	761.71	723.62	+38.088
Sulphuric anhydride	10,628.48	0.0035	10,628.48	6,952.25	6,081.34	+870.91
Volatile organic compounds	16,521.09 (2025)	38.87	16,559.96 (2025)	4,597.92	4,827.62	-229.70
	16,473.28 (2024)		16,512.14 (2024)			
Benzene	55.56	N/A	55.56	24.37	26.57	-2.19
Toluene	197.24	N/A	197.24	47.70	71.18	-23.47
Xylene	105.76	N/A	105.76	48.84	57.33	-8.49
Hydrogen sulfide	16.43	N/A	16.43	1.28	1.79	-0.51
Ammonia	0.33	N/A	0.33	0.026	0.026	0.00
Manganese oxide	0.016	N/A	0.016	0.0002	0.0047	-0.0045
Ethanol	0.032	N/A	0.032	0.029	0.029	0.00
Methanol	0.22	N/A	0.22	0.22	0.22	-0.0005
MTBE	180.56	N/A	180.56	180.06	180.56	-0.49
Total:	33,762.52 (2025)	39.61	33,802.12 (2025)	14,024.13	13,034.23	-
	33,714.70 (2024)		33,754.31 (2024)	Incl: 14,002.63 t for refinery	Incl: 13,020.83 t for refinery	

Company's NMVOC emission reduction plans:

- Implement BAT 18 and BAT 6 provisions by continued monitoring of NMVOC emissions through LDAR Program in 2019-2030;
- Implement plans for remediation of oil-contaminated ponds and soil, as well as air pollution reduction plan of Waste Water Treatment Shop;
- Apply integrated measurement of NMVOC emissions: instrumented measurements and calculations (where possible, based on the European Environment Agency's methodology EMEP/CORINAIR for accounting emissions);
- As for a number of pollution sources there was a transition from pollution assessment on the basis of calculation methodologies to application of instrumental measurement techniques, assessment of NMVOC emissions from each source of pollution separately became possible to look for reduction solutions. Pollution sources with highest NMVOC emissions will be analyzed and pollution reduction plans developed accordingly.

In 2025, the Company was operating in line with the statutory environmental requirements and in accordance with the significant environmental aspects identified, by introducing the changes necessary for proper implementation of the provisions set forth by the current and evolving requirements.

The Company also operated automated monitoring systems for SO₂, NO_x, CO₂ and particulate matter (PM). Compared with 2024, SO₂ emissions increased to 6.9 thousand tons, while NO_x emissions rose to 1.3 thousand tons. At the same time, NMVOC emissions decreased to 4.6 thousand tons (vs 4.8 thousand tons in 2024), representing a reduction of approximately 237 tons. The charts below present main yearly emissions and comparison with the 2005 baseline data.

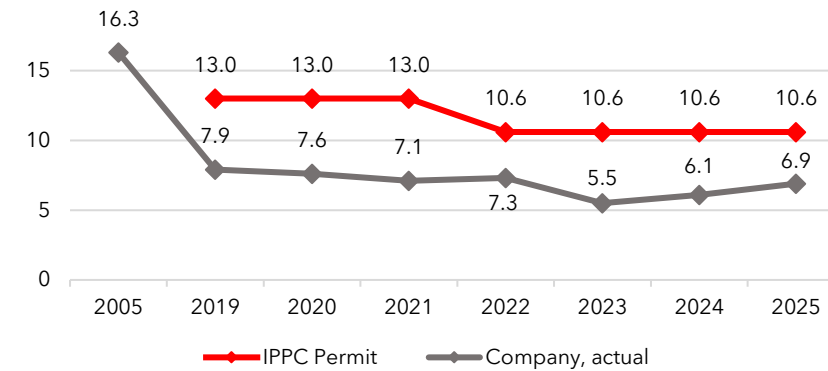
Company's SO₂ emission reduction plans:

The largest source of SO₂ emissions within the Company is Elemental Sulphur Production Unit. Approximately 70% of all SO₂ emissions from the refinery originate from this unit.

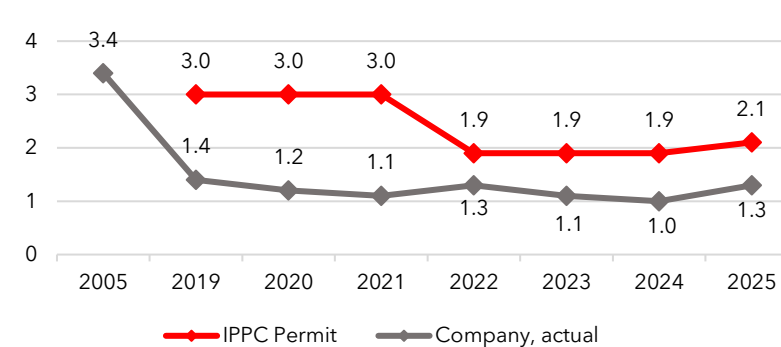
To reduce sulphur dioxide emissions, in 2025 the Company continued the mandatory environmental compliance project 'Sulphur 98.5', which had been initiated in previous years. Upon completion of the project, the conversion of H₂S to elemental sulphur is planned to be increased to 98.5 wt.%, resulting in lower SO_x emissions to atmosphere.

At present, the Company's Elemental Sulphur Production Unit consists of four process trains, each comprising one thermal stage and two catalytic Claus process stages. Under the project, each train is planned to be upgraded with a third catalytic SuperClaus stage. The project is scheduled for completion by 31 December 2029, with an estimated budget of EUR 62.949 million.

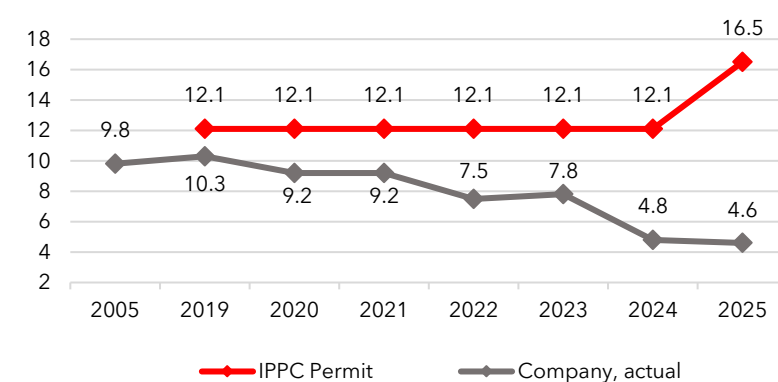
SO₂ emission (Kt/year)



NO_x emissions (Kt/year)



NMVOC emissions, Kt/year



Water pollution

Data on pollutants, released and transferred

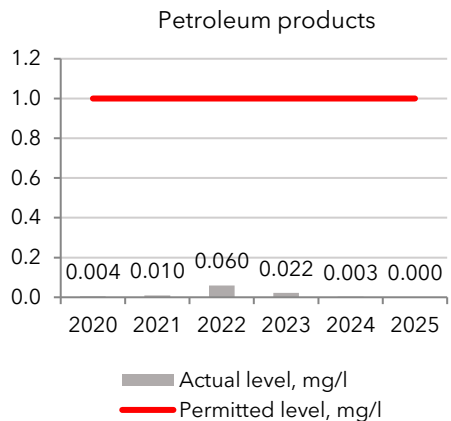
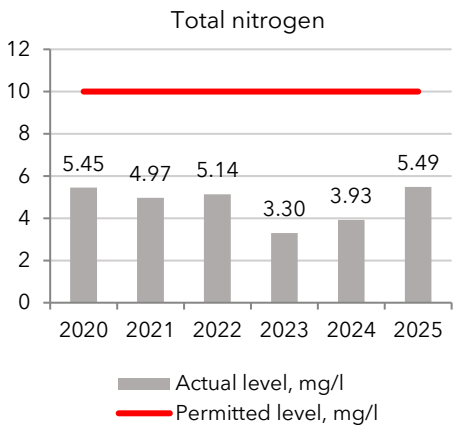
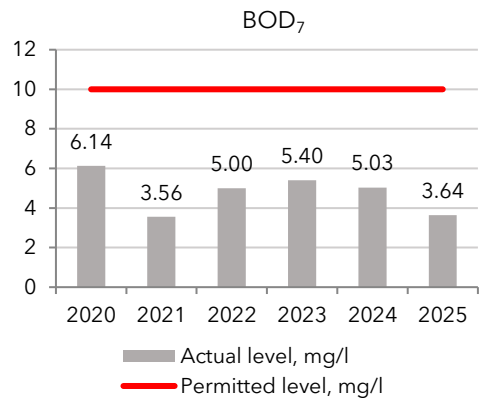
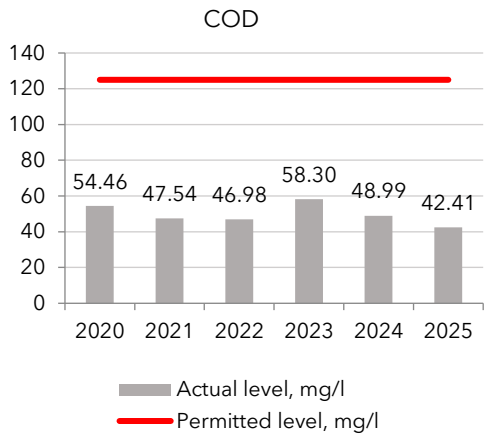
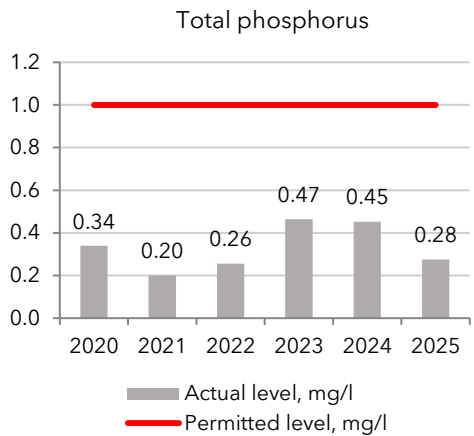
Table 8 provides information on the quantities of individual pollutants in accordance with Annex II to Regulation (EC) No. 166/2006 of the European Parliament and of the Council (the European Pollutant Release and Transfer Register Regulation, E-PRTR). Other Company pollutants covered by this Regulation, the quantities of which are below the reporting thresholds specified therein, are not included in the table below.

Table 8. Data on pollutants, released and transferred

Pollutant	Reporting threshold values for pollutants discharged to water, kg/year	Total released, kg/year	Total released, kg/year
		2025	2024
Nickel and its compounds	20	24	28
Zinc and its compounds (as Zn)	100	109.3	0
Phenols	20	52	0
Arsenic	5	17.4	0
Total organic carbon (TOC)	50,000	54,261	61,700
Total:	-	54,463.7	61,728

Main wastewater parameters analyzed

Allowable norms in 2025 (the same as in previous year) were not exceeded.



Other implemented measures to reduce pollution

The Company applies a range of technical and organizational measures to minimize environmental pollution

The electrostatic precipitator (ESP) is installed in the FCC Unit to collect particles.

Gasoline loading into railway tank cars and road tankers is carried out in a closed and sealed system, with generated NMVOC vapours extracted and prevented from being released into the atmosphere, and subsequently recovered. For this purpose, vapour recovery system is used. NMVOC and air mixture collected during loading operations is conveyed by a fan through an activated carbon filter bed. NMVOCs are adsorbed by the activated carbon, while the purified air is discharged to atmosphere. During the adsorption process, the carbon granules gradually become saturated and must be regenerated. Regeneration is performed under vacuum conditions using the carbon filter system. Two absorbers are required to ensure continuous vapour recovery. While one absorber is adsorbing NMVOCs, the other is being regenerated under vacuum.

In accordance with BAT 6 and BAT 18, the Company also operates a Leak Detection and Repair (LDAR) Program. Approximately 15,000 monitoring points are measured each year.

The Company implements an environmental monitoring program: impact on ambient air quality is assessed once a week at four monitoring points outside production area. The monitoring includes the measurement of benzene, SO₂ and NO₂ concentrations in near-ground ambient air.

Closed-type system for pressure safety valve relief to the flare installed in the process units.

Closed-type system for pressure safety valve relief to the flare installed in the process units with flare gas H₂S returned by compressors to the refinery fuel network.

The Company purchases certified bio-additives.

Large combustion plants with a rated thermal input exceeding 50 MW, as well as the catalytic cracking unit and elemental sulphur production units, are equipped with automated emission monitoring systems.

Air pollution is further reduced through modification of storage tank design and coating. Gasoline storage tanks are painted white with a solar reflectance greater than 70% and are fitted with fixed roofs, internal floating roofs (pontoons), and double-seal systems.

Air-cooled heat exchangers are widely used, and closed petroleum product drainage systems have been implemented.

A high degree of process automation is ensured through the use of process safety and protection systems.



VRU



ESP



LDAR

Substances of high concern

ORLEN Lietuva monitors the quantities of substances of concern used, produced, purchased and sold in its operations in order to ensure safe working conditions and compliance with applicable legislation. The majority of the Company's products, including intermediate products and processed crude oil, are classified as substances of concern, with the exception of bitumen, sulphur, liquefied petroleum gas (LPG) and propylene.

The data are presented based on hazard classification principles, with the quantities in the table grouped according to hazard classes. Where a substance is assigned to more than one hazard class, its quantity is reported separately within each applicable class. For this reason, no overall total is presented, as this would result in double counting and inaccurate aggregation of the data. The information in the table is summarized using two approaches: quantities reported for consolidated sustainability reporting purposes (excluding transactions between ORLEN Group companies); and total quantities, taking into account all flows associated with the Company.

Unlike in 2024, in 2025 the Company was able to collect data on quantities associated with the hazard statements EUH380, EUH381, EUH430, EUH431, EUH440, EUH441, EUH450, EUH451, H420 and EUH509. These hazard statements relate to endocrine-disrupting effects on human health and the environment, the potential for substances to accumulate in the environment and living organisms, long-term and diffuse pollution of water resources, and adverse effects on the ozone layer.

In 2024, improvements were made to the *ORACLE* system used by the Company. These modifications enabled information on such hazard categories to be transferred directly from Safety Data Sheets into the system. As a result, the Company is now able to generate reports on the quantities of such substances that are produced, consumed, imported, exported and sold.

Table 9. Quantities of substances of high concern at the Company

Hazard class and hazard category in accordance with Regulation (EC) No. 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures (CLP Regulation), amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No. 1907/2006.	Substances of concern generated, used in production, or purchased [tons]				Substances of concern contained in products or their components [tons]			
	2025		2024		2025		2024	
	Excluding transactions between ORLEN Group companies	Total associated with the Company	Excluding transactions between ORLEN Group companies	Total associated with the Company	Excluding transactions between ORLEN Group companies	Total associated with the Company	Excluding transactions between ORLEN Group companies	Total associated with the Company
Carcinogenicity categories 1 and 2	15,915,573.61	25,351,469.28	15,694,620.69	24,775,479.84	15,833,888.27	25,330,874.12	15,723,624.77	24,712,028.22
Germ cell mutagenicity categories 1 and 2	5,946,852.71	12,907,108.22	6,090,993.63	12,300,629.61	5,907,041.61	12,801,115.22	6,103,417.46	12,375,491.06
Reproductive toxicity categories 1 and 2	11,353,205.68	17,929,927.19	11,085,047.25	17,007,317.89	11,312,295.36	17,822,834.96	11,106,885.52	17,062,486.63
Respiratory sensitisation category 1	0.01	0.01	267.55	267.55	0.01	0.01	270.57	270.57
Skin sensitisation category 1	173.68	173.68	588.86	588.86	365.99	365.99	436.21	436.21
Chronic hazard to the aquatic environment categories 1 to 4	17,164,722.17	26,056,661.47	16,931,647.16	25,538,732.47	17,082,319.96	26,026,950.70	16,972,797.46	25,487,803.00
Specific target organ toxicity, repeated exposure categories 1 and 2	10,845,850.28	19,794,954.64	10,571,618.78	19,273,133.00	10,748,297.85	19,758,492.32	10,608,421.18	19,188,372.69
Specific target organ toxicity – single exposure categories 1 and 2	20,178.92	20,178.92	22,438.81	22,438.81	20,140.32	20,140.32	22,372.69	22,372.69
Endocrine disruption for human health	0.00	0.00	N/A	N/A	0.00	0.00	N/A	N/A
Endocrine disruption for the environment	0.00	0.00	N/A	N/A	0.00	0.00	N/A	N/A
Persistent, Mobile and Toxic (PMT) substances or Very Persistent and Very Mobile (vPvM) substances	0.00	0.00	N/A	N/A	0.00	0.00	N/A	N/A
Persistent, Bioaccumulative and Toxic (PBT) substances and Very Persistent, Very Bioaccumulative (vPvB) substances	0.00	0.00	N/A	N/A	0.00	0.00	N/A	N/A
Hazardous to the ozone layer	0.00	0.00	N/A	N/A	0.00	0.00	N/A	N/A



Substances of very high concern

The Company does not produce substances of very high concern (SVHC); however, such substances are used in the Company’s activities. It is noteworthy that quantities used are not significant. Such substances are typically used in laboratories, e.g., as certified reference materials for analysis of trace metals, preparation of solutions, drying of gas, etc. Some of these substances are components of mixtures used for maintenance, such as oils, adhesives or sealing products. These substances may be present in some catalysts, absorbers or additives. More detailed information on SVHC used at the Company is provided in Table 10.

The Company monitors the use of these substances in its processes to ensure safe working conditions and compliance with legislation. ECHA list of SVHC is also periodically reviewed. To reduce adverse impacts, SVHC are replaced, where possible, with less hazardous alternatives; in other cases, adequate risk management measures are applied, including use of personal protective equipment.

Table 10. Quantities of substances of very high concern at the Company

Substance	EC number	CAS number	SVHC formed or used in production, or acquired, t		SVHC released from installations in a form of products or contained in products or in services, t	
			2025	2024	2025	2024
Bis(α,-dimethyl benzyl)peroxide	201-279-3	80-43-3	N/A	0.00	N/A	0.0002
Triphenylphosphate	204-112-2	115-86-6	0.00000183	N/A	0.00000183	N/A
Potassium dichromate	231-906-6	7778-50-9	0.00425	N/A	0.0015	N/A
Phenol, dodecyl-, branched	310-154-3	121158-58-5	0.000093005	0.000475437	0.000093005	0.003550643
Octamethylcyclotetrasiloxane	209-136-7	556-67-2	0.000099603	0.00019987	0.00009135266	0.000158913
Lead dinitrate	233-245-9	10099-74-8	0.00000016	0.00000005	0.00000016	0.00000005
Dodecamethylcyclohexasiloxane	208-762-8	540-97-6	0.000170748	0.000342634	0.00015139656	0.00026409
Decamethylcyclopentasiloxane	208-764-9	541-02-6	0.000099603	0.00019987	0.00008831466	0.000154053
Cobalt dichloride	231-589-4	7646-79-9	0.00011	N/A	0.00011	N/A
Chrysene	205-923-4	218-01-9	0.000001	N/A	0.000001	N/A
Chromium (VI) trioxide	215-607-8	1333-82-0	0.12826732	N/A	0.12826732	N/A
Sulfuric acid, cadmium salt, hydrate (3:3:8)	616-572-5	7790-84-3	0.024	0.03	0.034	0.02
Cadmium nitrate	233-710-6	10325-94-7	0.0000000206	0.00000005	0.0000000206	0.00000005
Cadmium Chloride	233-296-7	10108-64-2	0.0005	0.0005	0.0005	0.0005
Boric acid	233-139-2	10043-35-3	0.000002525	0.02	0.0000101	0.02
Arsenic acid	231-901-9	7778-39-4	0.0000002535	N/A	0.0000002535	N/A
4-tert-butylphenol	202-679-0	98-54-4	0.072	0.036	0.061965	0.018505
Lead	231-100-4	7439-92-1	N/A	0.0000216	N/A	0.0000216
Diboron trioxide	215-125-8	1303-86-2	N/A	0.0528	N/A	0.0528
Phenolphthalein	201-004-7	77-09-8	N/A	0.0001	N/A	0.0001
Cobalt dinitrate	233-402-1	10141-05-6	N/A	0.00000005	N/A	0.00000005
Potassium chromate	232-140-5	7789-00-6	N/A	0.0000129963	N/A	0.0000129963
Ammonium dichromate	232-143-1	7789-09-05	N/A	0.00000005	N/A	0.00000005
Diarsenic trioxide	215-481-4	1327-53-3	N/A	0.00000005	N/A	0.00000005
Total:	-	-	0.2296	0.1407	0.2268	0.1163





Policy on Water Resources

Both long-term and short-term water resource management measures are applied at the Company. Short-term measures are for optimization of fresh water use, improvement of wastewater management efficiency. Long-term measures involve calculation of water footprint and water use efficiency (WUE) indicator. More details on water footprint can be found [here](#). Fresh water use and wastewater treatment efficiency is continuously improved.

Before commencement of investment projects, the Company performs environmental impact assessments and, where needed, field studies. Appropriate documentation is presented to local authorities and communities as part of official administrative procedures. Additional measures are applied to reduce environmental impact, including procedural and organizational systems. Key measure – Integrated Management System (IMS) in which objectives and initiatives related to water use and wastewater management are defined – accounting and control are carried out in accordance with the IMS process 'Accounting of Water Uses and Wastewater Management'. Other optimal and implementable technical solutions are applied, including such initiatives as search for alternative water sources, inclusion of circular economy principles, deployment of efficient technologies. Educational initiatives are organized to raise employees' awareness of sustainable development and the conservation of water resources.

The following process indicators are evaluated once per month:

- Quantity of extracted ground water.
- Quantity of extracted surface water.

- Concentration of pollutants (BOD₇, COD) in treated industrial effluents from the crude oil refinery discharged to surface water bodies.

Only treated effluents compliant with Legislation of the Republic of Lithuania and IPPC permit are released to the environment. Intensity of water use in production processes across all operational segments (energy, refining, and petrochemical segments) is directly related to the generation of wastewater, including industrial wastewater. A significant part of activities depend on availability and quality of water resources, as well as on efficient wastewater discharge management.

The Company has set targets for the period of 2025-2030 reduce water consumption on annual basis. The Company has developed its water conservation plan for 2025-2030, with a sustained focus on the reduced consumption of drinking water and river waters in the production processes.

The Company also aims to increase the amount of water reused, reduce the volume of wastewater generated, and encourage employees to use water more sparingly both in at home and in production processes. This enables replenishment of circulating and fire water systems.

Operational costs are planned for in both short-term and long-term budget plans. The Company pays taxes for use of water resources and wastewater discharge, i.e., for amount of pollutants identified in the discharged wastewater.

The Company allocates part of its funds to water quality testing, determination of mercury in wastewater discharges, determination of phthalates, assessment of wastewater toxicity, inventory of priority hazardous substances in wastewater discharges and other measures. The Company also funds implementation of water conservation program. Measures implemented throughout the reporting year can be found here.

Additional measures to reduce emissions to soil and groundwater were also applied in 2025. The following activities were implemented:

- groundwater pollution monitoring;
- identification of recurrent pollution sources and their localization;
- elimination of locally accumulated free oil products;
- soil monitoring.

Implementable technical and organizational measures include:

- application of circular economy principles,
- deployment of efficient technologies,
- employee environmental awareness initiatives to encourage sustainable use of water resources,
- implementation of drinking water conservation measures.

The following key process indicators are also assessed on a monthly basis: the amount of extracted groundwater, the amount of extracted surface water, and concentrations of pollutants (BOD₇ and COD) discharged to surface water bodies with treated wastewater.

Water use data analysis is performed on a monthly basis, analysis of water use trends (increase or decrease) is performed and information (diagrams) is submitted on the Intranet for employees.

Company’s water footprint

In crude oil refining industry, water is used for various means: for cooling, steam production, cleaning, etc. Calculating the water footprint helps the Company shape its water-use policies and achieve its sustainability goals.

Water footprint is a measure of the amount of water used in the production of a product, process, or organization, and it takes into account the water used throughout the product's life cycle. It is divided into three main categories, which help to comprehensively assess water use and its environmental impact in crude oil refining industry. Each has its own specifics and measurement methods. The purpose of Water Footprint calculation is to present refinery employees with objective information, highlighting the importance of and responsibility for efficient water use.

Blue Water Footprint – volume of water from rivers, lakes, underground springs consumed as a result of production. In other words, Blue Water Footprint (m³) = overall water use (m³). In the context of crude oil refinery, Blue Water Footprint is essential as it directly relates to use of fresh water resources. Companies monitor and manage use of surface (river) and underground (from bores) water to optimize production processes and reduce ecological footprint. Systemized results of Blue Water Footprint calculations are presented in Table 11.

Table 11. Blue Water Footprint results

	2025	2024	Change
Annual quantity of used river water, m ³	3,119,723	3,254,847	-135,124
Annual quantity of used underground water, m ³	213,251	180,686	+32,565
Crude refinery Blue Water Footprint (m ³ /year)	3,332,974	3,435,533	-102,559

In 2025, compared to 2024, the Blue Water Footprint of crude refinery was reduced due to lower consumption of river water.



Green Water Footprint – water from precipitation which does not return to environment afterwards. In the case of crude oil refinery, this could be rainwater entering the Company’s premises and being managing through surface wastewater systems or, ideally, collected and reused in industrial processes. In activities of crude oil refinery, Green Water Footprint could be associated with the aspects of green infrastructure management and efficiency of wastewater treatment facilities. Table 12 presents the results of the Green Water Footprint calculation for 2025, compared with the previous reporting period.

Table 12. Green Water Footprint results

	2025	2024	Change
Crude oil refinery Green Water Footprint (m ³ /year)	738,300	712,700	+25,600

Compared to 2024, in 2025 crude refinery Green Water Footprint increased due to higher precipitation.

Grey water footprint - polluted water that becomes dependent on treatment prior to return to environment. Includes wastewater with pollutants, such as petroleum products, metals or organic materials generated during production. In other words, grey water footprint includes the amount of water required to neutralize polluted water to natural water quality standards. It is one of the most critical indicators in the refinery as it directly reflects wastewater treatment efficiency. Calculated using the formula:

$$\text{Grey water footprint (m}^3\text{)} = \frac{\text{pollutant load (kg)}}{\text{permissible pollutant concentration (kg/m}^3\text{)}}$$

Table 13 presents the results of the grey water footprint calculation for 2025, compared with the previous reporting period.

Table 13. Calculated refinery’s grey water footprint based on the listed pollutants [m³]

Pollutant	2025	2024	Change, m³ + increased,- decreased
Petroleum products	0	12,794	-12,794
BOD ₇	1,474,418	1,997,805	-523,387
COD	1,374,763	1,555,257	-180,494
Total phosphorus	1,112,901	1,792,078	-679,177
Total nitrogen	2,224,032	1,557,687	+666,345
Suspended matter	688,675	952,287	-263,612
Benzene	0	0	0
Lead	5,300	53,333	-48,033
Cadmium	80,875	47,500	+33,375
Nickel	240,200	277,000	-36,800
Mercury	183,286	89,491	+93,795
Di(2-ethylhexyl)phthalate	0	360,000	-360,000

Table 14 presents overall water footprint. Which includes the total of blue, green and grey water footprints.

Table 14. Overall water footprint of the Company [m³]

Pollutant	Overall footprint in 2025, m³	Overall footprint in 2024, m³	Change, m³ + increased,- decreased
Petroleum products	4,071,274	4,161,027	-89,753
BOD ₇	5,545,692	6,146,038	-600,346
COD	5,446,037	5,703,490	-257,453
Total phosphorus	5,184,175	5,940,311	-756,136
Total nitrogen	6,295,306	5,705,920	+589,386
Suspended matter	4,759,949	5,100,520	-340,571
Benzene	4,071,274	4,148,233	-76,959
Lead	4,076,574	4,201,566	-124,992
Cadmium	4,152,149	4,195,733	-43,584
Nickel	4,311,474	4,425,233	-113,759
Mercury	4,254,560	4,237,724	+16,836
Di(2-ethylhexyl)phthalate	4,071,274	4,508,233	-436,959

Water Use Efficiency (WUE) indicator is calculated in two ways (both calculated indicators are reviewed in this report):

1. based on volume of processed crude oil,
2. based on volume of produced products.

WUE calculated based on volume of processed crude oil is an essential indicator in refinery industry indicating how many cubic meters of water is used per one ton of refined crude oil. The lower the WUE, the more efficiently the Company uses water and applies advanced circulation technologies. WUE calculated based on the amount of products produced assesses water consumption in relation to the volume of products produced. This indicator helps the Company understand how efficiently water is used in the production of final products. The lower this indicator, the more sustainable and cost-efficient the production.

Calculation of water use efficiency (WUE) per amount of oil processed

This indicator is calculated using the formula:

$$\text{WUE (m}^3 \text{ water per ton of processed oil)} = \frac{\text{total water consumption (m}^3\text{)}}{\text{total processed oil (t)}}$$

Table 15. WUE based on volume of produced refined crude oil

	Processed oil	Used water	WUE
2024	8,845,558	3,435,533	0.388
2025	9,400,059	3,332,974	0.355

In 2025, refinery WUE per unit of processed oil decreased vs 2024 due to higher volumes of crude oil processed and lower water consumption. For 2026, the Company has set a target for WUE not to exceed 0.427 m³ of water per 1 ton of crude oil processed. **Less than 3 m³ of water per ton of processed oil is considered a very good indicator, signifying that the company uses water efficiently and uses modern water circulation systems.**

Calculation of water use efficiency (WUE) per unit of products produced

This indicator is calculated using the formula:

$$\text{WUE (m}^3 \text{ water per ton of products)} = \frac{\text{total water consumption (m}^3\text{)}}{\text{total product output (t)}}$$

Table 16 presents data and results of WUE calculation based on the volume of products produced.

Table 16. WUE based on volume of produced products

	Produced products	Used water	WUE
2024	8,509,108	3,435,533	0.404
2025	9,089,121	3,332,974	0.367

In 2025, refinery WUE per unit of processed oil decreased vs 2024 due to higher volumes of crude oil processed and lower water consumption.

In order to use water efficiently, the Company implements measures that enable the assessment of water use efficiency and its environmental impact:



Water recirculation systems: investment into advanced water recirculation technologies to reduce the need for fresh water and reduce the volume of wastewater generated.



Regular monitoring: implementation of water use monitoring and analysis enabling timely identification of nonconformities and implementation of corrective actions.



Process optimization: review and optimization of production processes requiring considerable volume of water in search of alternatives and less water-intensive methods.



Informing employees: information on volume of used water is published on the Intranet on monthly basis. Information about drinking water saving measures implemented in 2025 is displayed on the Company's televisions located in publicly accessible areas for employees.

Overview of use of water resources

Significant volume of water is needed for Company's activities. ORLEN Lietuva aims to reduce water use and reuse more water every year. The Company also encourages employees to use water sparingly both at home and at work.

At the Company, underground drinking water is extracted from ORLEN Lietuva water source. Approved amount of drinking water resources is 3,400 m³ per day (1,241 thousand m³ per year). Surface (river) water is extracted from Juodeikiai Pond. Maximum volume permitted for extraction is 7,505 thousand m³ per year (20,562 m³ per day). Process water – treated industrial wastewater used for make-up of firewater and circulating water systems.

Water discharge limits and conditions are established in IPPC permit. Volume of discharged water also depends on implemented measures to reduce water consumption. Each month, the Company collects data on volume of extracted water and volume of wastewater released to environment. This data is published on the [Company's website](#).



Table 17 includes information on quantity of actually extracted surface water at the Company, Būtingė Terminal and Biržai OTS. This and other summaries on water extraction, use, etc. include data from ORLEN Lietuva units; however, they do not include data from subsidiaries that existed during the reporting period.

Table 17. Data on extracted surface water

Data on extracted surface water at ORLEN Lietuva and other Company's units, m ³			
Surface water			
Location	2025	2024	Change
River water extracted for the refinery	3,119,723.0	3,254,847.0	-135,124.0
Surface water for Būtingė Terminal	5,436.7	7,269.0	-1,832.3
Būtingė Terminal surface, industrial water, water from drainage	90,397.0	87,756.0	+2,641.0
Surface water for Biržai Oil Transshipment Station	29,060.6	20,648.6	+8,412.0
Total:	3,244,617.3	3,370,520.6	

Table 18 includes information on quantity of actually extracted underground water at the Company, Būtingė Terminal and Biržai OTS.

Table 18. Data on extracted underground water

Data on extracted underground water at ORLEN Lietuva and other Company's units, m ³			
Underground water			
Location	2025	2024	Change
Extraction of underground water at Būtingė Terminal	903	1,257	-354
Extraction of underground water at Biržai OTS	177	239	-62
Refinery underground water	213,251	187,007	+26,244
Total:	214,331	188,503	

Table 19 indicates summarized volume of water (treated wastewater) for make-up of firewater and circulating water systems.

Table 19. Information on water used for make-up of firewater and circulating water

Utilization of process water	2025	2024	Change
for make-up of firewater systems, m	2,451,528	3,591,476	-1,139,948
for make-up of circulating water systems, m	1,695,361	964,314	+730,047

Records are maintained based on the readings of water meters installed in the Waste Water Treatment Shop. Each month, Quantitative Report of Treatment Facilities Effluent Flows is submitted by Waste Water Treatment Shop providing information on quantities of treated and reused wastewater for make-up of firewater and circulating water systems.

Compared to 2024, less firewater was used in 2025 due to maintenance of old firewater pipelines, therefore there were less leakages. Pipeline flushing process was improved, resulting in less firewater used for flushing.

Table 20 includes information on volume of saved water based on AIVIKS (6.1) report.

Table 20. Amount of water saved at the Company

Total amount of recycled and reused water, m ³		
2025	2024	Change
160,918	165,394	-4,476

Table 21 includes information on quantity of actually used water at the Company, Būtingė Terminal and Biržai OTS.

Table 21. Data on actually used water

Used water amount, m ³			
Type	2025	2024	Change
Water used at Būtingė Terminal	1,720	1,941	-221
Water used at Biržai OTS	177	239	-62
Water used at refinery (river + drinking water)	3,332,974	3,441,854	-108,880
Total:	3,334,871	3,444,034	

The Company treated 6,819 thousand m³ of wastewater (in 2024, the volume of treated wastewater was 6,803 thousand m³).

In 2025, 4,082 thousand m³ of treated wastewater in total was released to environment: 30 thousand m³ was released to Juodeikiai Pond from Power Plant premises via Outlet No. 1, and 4,052 thousand m³ of treated industrial and rain wastewater was released to Dubulis Stream via Outlet No. 2.

Table 22 includes information on volume of released treated wastewater, including by Company units.

Table 22. Data on volume of released treated wastewater at the Company and Company's units

Amount of generated wastewater, m ³			
Location	2025	2024	Change
Būtingė Terminal	96,736.7	96,282	+454.7
Biržai Oil Transshipment Station	29,237.6	20,887.6	+8,350
Crude refinery	3,332,974	3,441,854	-108,880
Total:	3,458,948.3	3,559,023.6	

Table 23 includes information on volume of discharged treated wastewater by the type of receiving environment.

Table 23. Data on treated wastewater discharged into the Baltic Sea and third-party systems

Data on discharged water and wastewater by the type of receiving environment						
	Into sea			Into third-party systems		
	2025	2024	Change	2025	2024	Change
Būtingė Terminal	90,397	87,756	+2,641	1,720*	1,941*	-221
Total:	90,397	87,756	2,641	1,720	1,941	-221

* Domestic wastewater (faecal wastewater) is transferred for treatment to UAB Palangos vandenys.

Table 24. Data on volume of released treated wastewater into surface water

Data on discharged water and wastewater by the type of receiving environment			
	Surface water		
	2025	2024	Change
Treated wastewater of Būtingė Terminal	5,436.7	7,269	-1,832.3
Treated wastewater of Biržai Oil Transshipment Station	29,060.6	20,648.6	+8,412
Treated wastewater of refinery	4,081,823	3,997,536	+84,287
	4,116,320.3	4,025,453.6	

Measures for water saving implemented in 2025

Works related to elimination of drinking and process water leakage, unsealed places, malfunctions of water discharge mechanisms, blockages and other defects that increase water use. Eliminated malfunctions helped reduce water losses and ensure more efficient water use in all units.

The following planned measures were implemented in 2025:

- 7 water sensor taps and flow limiters in hand washing basins were installed inside the Company's administrative, control room, hygiene facilities,
- worn sanitary facilities and older installations were replaced and repaired.

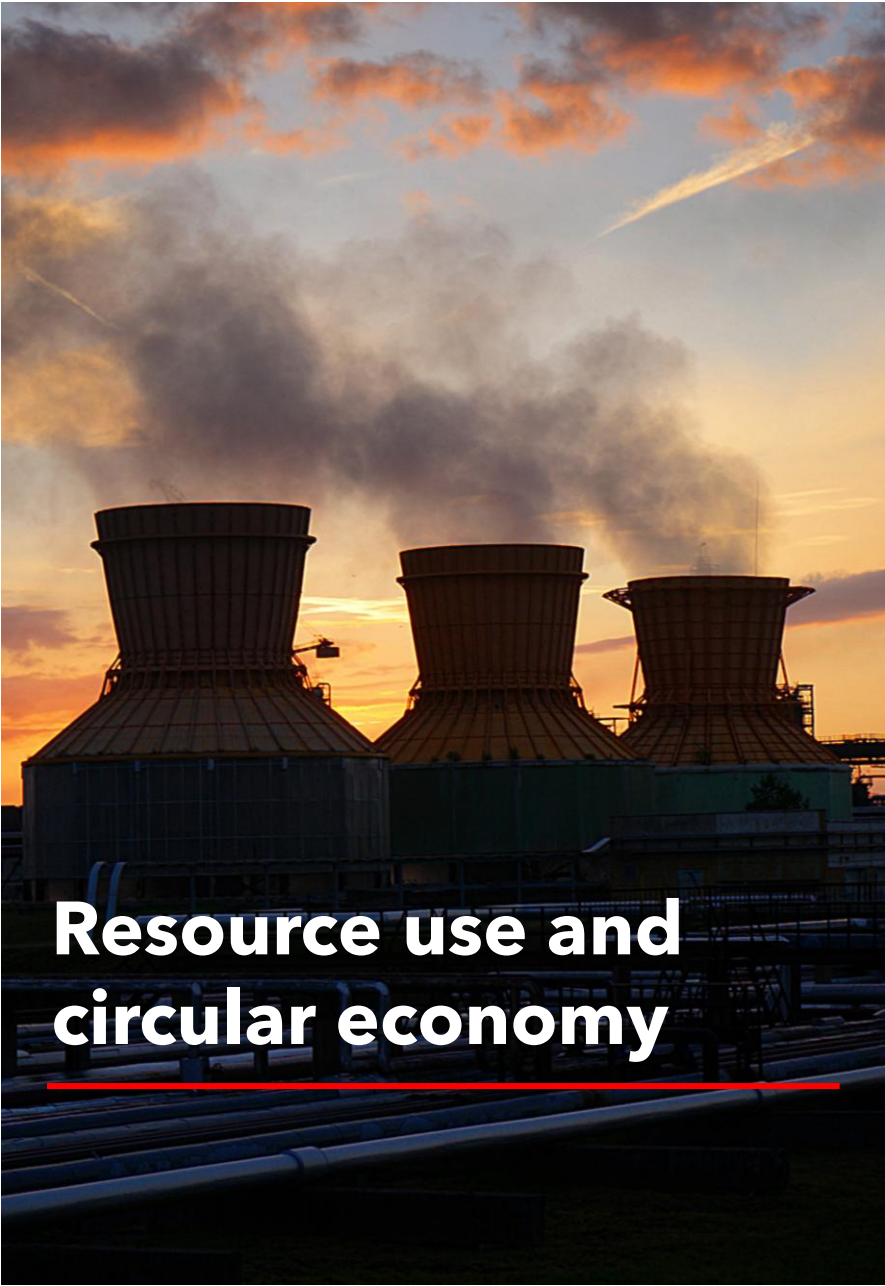
Other expenses for implementation of measures not specified in the water conservation plan based on failure categories registered in 2025 (operations and non-operations area):

- water leakage in internal pipelines, vents, flanges;
- replacement of taps,
- leakage of toilet bowls, malfunction of flushing mechanisms,
- leakage in heating stages,
- replacement of water filters.

Warehouse potable water line inlet was repaired to reduce water losses. Besides, Power Plant river water pipeline was replaced (3,310 m).

In the future (including in 2026), the following is planned:

- Install water flow limiters in hand washing basins inside the Company's administrative, control room, hygiene facilities,
- Install push-button self-closing taps in the Company's showers.



Resource flow: feedstock and products

ORLEN Lietuva activities include production of fuel, petrochemical products, electricity and heat, therefore a wide variety of feedstock is used in the process – crude oil, natural gas, biocomponents, etc. Significant quantities of waste is also generated. Most of used resources are non-renewable. Risks associated with use of resources and potential associated with feedstock availability and supply, use and management of water and electricity, etc. The Company currently does not produce any products or materials that align with the principles of circular economy. Products are produced from crude oil, i.e. fossil fuels. The Company processed 9.7 million tons of feedstock, i.e. 0.6 million tons (6.7%) more than in 2024 when 9.1 million tons were processed. The increase in quantities of processed feedstock was due to economic reasons. Processing is optimized with regard to macroeconomic conditions, world oil and petroleum product pricing, domestic demand for petroleum products and other factors. Detailed flow of specific technical and biological feedstocks is not presented in this Report as no consent to publish the data was obtained from data owners. This data was disclosed while preparing the consolidated Management Board’s Report on the operations of the ORLEN Group and ORLEN S.A. in 2025.

Table 25 includes summarized Company’s resource inflows.

Table 25. Company’s resource inflows summary

Resource inflows according to type	Quantity in 2025, t	Quantity in 2024, t	Change, t
Total mass of products entering the Company	142,858.74	120,895.77	21,962.97
Total mass of biological products entering the Company	87,767.43	92,188.87	-4,421.44
Total mass of technical products entering the Company	9,484,202.04	8,886,090.35	598,111.69
Total mass of products, biological materials and technical materials entering the Company	9,714,828.21	9,099,174.99	615,653.22

ORLEN Lietuva uses Material Balance Accounting System (MBAS). Data on feedstock is transferred on the basis of weighting report, acceptance of excise goods is carried out in accordance with excise documents, etc. Data from acceptance statements to MBAS is transferred automatically but it requires manual editing according to aforementioned documentation. Feedstock weighting: carried out for both road and rail transport using weighing scales that are tested and compliant with regulations. Data is processed, calculated under Company’s Regulations on Automated Calculation of Material Balance for Production.

Total quantities of feedstock amounted to 9,714,828.2 t.

This amount includes all flow in relation to the Company, including technical and biological feedstock and flow between ORLEN Group companies. When providing information for the consolidated sustainability statement, internal flows within the ORLEN Group were taken into account and separated.

Waste

Waste is an integral part of the operations of companies within the production industry. Both hazardous and non-hazardous waste is generated at the Company. Waste quantity is calculated according to weight determined during waste weighing, in some cases, the amount of construction waste is calculated according to volume or density of accumulated waste. Data is obtained from direct measuring, e.g. such as weighing reports, waybills, and waste notes. After final handling of waste, contractors must present waste management documents identifying the selected waste management method. Data on quantities of waste generated at the company is provided in accordance with data submitted on the Product, Packaging and Waste Accounting Information System (GPAIS). Generated waste is classified under applicable European and national regulations (laws). Waste composition is closely linked to production activities carried out in facilities, process specifics, types of auxiliary substances.

Large quantities of different waste are generated at refineries. Waste can be dangerous to the environment and human health, therefore the proper waste management is important not only to comply with environmental requirements but also due to economic and social reasons.

Mostly construction and demolition waste is generated at the Company. The following is also generated: oil-containing sludge, wastewater treatment sludge, contaminated soil and stones, scrap metal, water clarification process sludge, decommissioned railway sleepers, coke, spent catalysts, insulation materials, absorbents, biodegradable waste, sand-blasting waste, wood packaging, bituminous mixtures, municipal waste, refractory waste. Information on specific waste quantities is available [here](#).



In 2025, activities for the cleaning of sludge and soil contaminated with petroleum products were carried out in accordance with the 2023-2030 plan. During this period, it is intended to clean up approximately 27,000 tons of sludge and soil contaminated with petroleum products. Two ponds were also cleaned. The goal was to clean 22,400 m³ of sediments (sludge) inside both ponds. The Company plans to continue cleaning works. CAPEX and OPEX are established in short-term and long-term budget plans.

It is noteworthy that the Company manages both hazardous and non-hazardous waste; the Company holds a hazardous waste management license (information can be verified here: [License No. 000617](#)). The license grants the right to store, dispose of and recover hazardous waste. Hazardous waste includes sludge contaminated with petroleum products, contaminated soil, liquids, as well as petroleum product mixtures, waste oils. Approximately 4,000-5,000 tons of soil contaminated with petroleum products is cleaned. Such cleaning takes around 18-24 months. Approximately 4,000-10,000 tons (quantity in dry matter) of waste treatment sludge is handled per year. Capacity of Oil Contaminated Soil Regeneration Area is approximately 12,000 tons of contaminated soil and sludge. Biodegradable technology is applied, with the breakdown of petroleum products using bacteria preparations.

Non-hazardous waste include, for example, sludge from water clarification in the ponds of Power House Sludge Section. Capacity of the ponds is ~252,000 m³, with filling level of ~ 35%. Construction waste at the construction waste site is handled by crushing materials (such as concrete, bricks, and mixed construction and demolition waste) to produce aggregates of various fractions which are then used within the Company's territory, e.g. for road repair or other needs.

The Company funds different measures for waste management. For example, funds are allocated for aforementioned cleaning works of sludge and soil contaminated with petroleum products, as well as for the management of construction waste, the collection of generated waste, and its transfer to external waste management companies for treatment. Funds are also allocated in long-term plans.

During 2025, a total of 24,728.15 tons of different types of waste were generated in the Company.

In 2024 - 19 190.56 t.

Objective for 2025:

Ensuring that at least 70% of the waste generated is recycled or recovered through R3/R4/R5 and R9 waste management operations.

Ensuring that waste such as construction waste, scrap, catalysts suitable for recycling (recovery of metals), oil contaminated soil, soil separated after the centrifuge, sludge are subject to R3/R4/R5 and R9 waste management operations. Such objective is applied since 2024.

More information on R3, R4, R5, R9 waste management operations is available in Waste Management Rules No. 217.



Table 26 includes detailed quantities of waste generated in 2025. For comparison, data from the previous reporting period are also provided.

Table 26. Quantity of waste generated at the Company, in tons

Name	Quantity in 2025	Quantity in 2024	Change
[1] Total amount of waste not disposed of, t [2+6]	23,769.65	18,531.84	+5,237.82
[2] Total amount of hazardous waste not disposed of, t [3+4+5]	9,638.27	8,734.66	+903.61
[3] Quantity of hazardous waste prepared for reuse, t	5,737.40	2,653.78	+3,083.62
[4] Quantity of processed hazardous waste, t	3,152.19	5,070.78	-1,918.59
[5] Quantity of hazardous waste directed for recovery, t	748.68	1,010.10	-261.42
[6] Total amount of non-hazardous waste not disposed of, t [7+8+9]	14,131.38	9,797.18	+4,334.20
[7] Quantity of non-hazardous waste prepared for reuse, t	0.00	0.00	0.00
[8] Quantity of processed non-hazardous waste, t	13,073.55	9,487.01	+3,586.54
[9] Quantity of non-hazardous waste used for recovery, t	1,057.83	310.17	+747.66
[10] Total amount of waste not disposed (unrecycled), t [11+15]	958.50	658.72	+299.77
[11] Total amount of hazardous waste not disposed of, t [12+13+14]	518.03	261.33	+256.69
[12] Quantity of incinerated hazardous waste, t	2.27	0.01	+2.25
[13] Quantity of hazardous waste disposed of in landfills, t	515.76	261.32	+254.44
[14] Quantity of hazardous waste disposed of by other disposal operations, t	0.00	0.00	0.00
[15] Total amount of non-hazardous waste not disposed of, t [16+17+18]	440.47	397.39	+43.08
[16] Quantity of incinerated non-hazardous waste, t	0.08	0.00	+0.08
[17] Quantity of non-hazardous waste disposed of in landfills, t	95.50	0.00	+95.50
[18] Quantity of non-hazardous waste disposed of by other disposal operations, t	344.89	397.39	-52.50
[19] Total generated quantity of waste, t [20+21+22]	24,728.15	19,190.56	+5,537.59
[20] Total quantity of hazardous waste, t [2+11]	10,156.30	8,995.99	+1,160.31
[21] Total quantity of radioactive waste, t	0.00	0.00	0.00
[22] Total quantity of non-hazardous waste, t [6+15]	14,571.85	10,194.57	+4,377.28
[23] Total quantity of waste at the end of the reporting year, t	16,030.88	15,148.21	+882.67

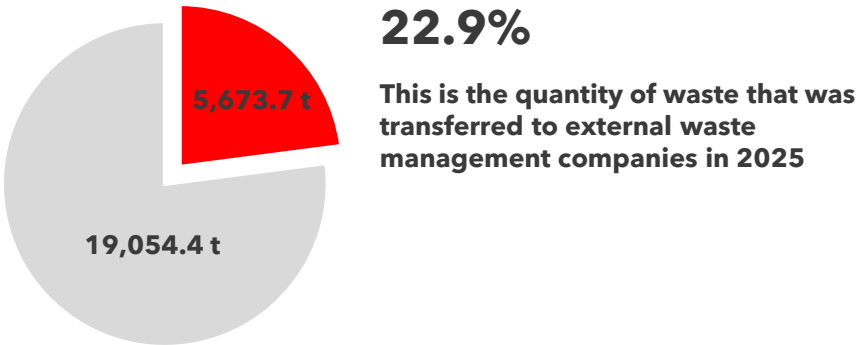
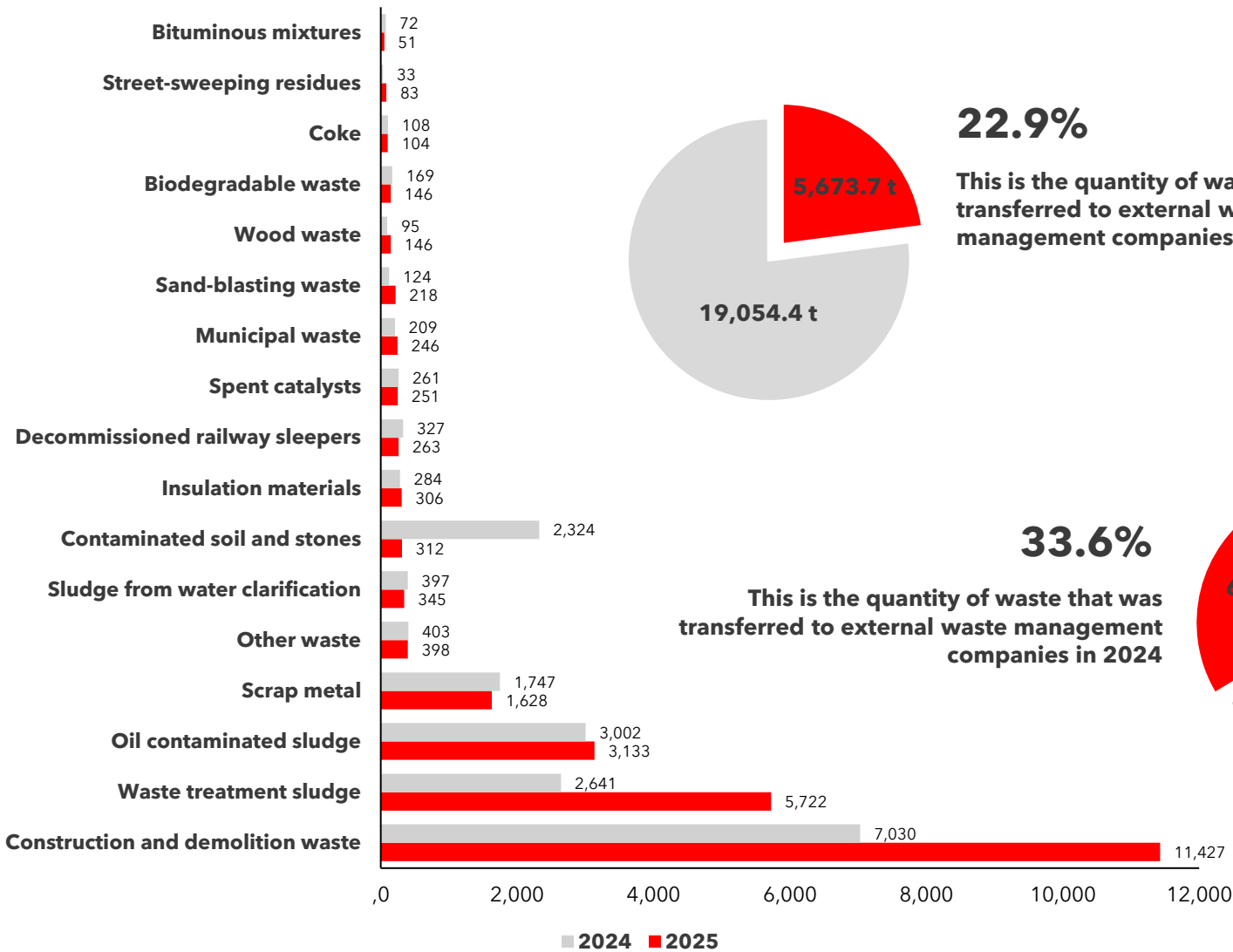
Upon comparing the 2025 data with the previous reporting period, the main reasons for the differences are presented below:

• **Quantity of processed non-hazardous waste:** the main change occurred because more concrete waste was generated in 2025 (waste code: 17 01 01) due to intense construction and demolition works at the refinery.

• **Quantity of processed hazardous waste:** The difference of ~ 2,000 tons is due to contaminated soil and stones (waste code: 17 05 03*) generated during the excavation of contaminated surfaces, slopes, etc. Contaminated soil and stones are cleaned at Wastewater Treatment Shop. More excavation works of contaminated soil were carried out in 2024.

• **Quantity of hazardous waste prepared for reuse:** significant increase in wastewater sludge (waste code: 19 11 05*) in 2025 was due to final treatment of one of the collectors. The collector was one of the storage places for contaminated sludge before being transferred to centrifuge of Oily Sludge Treatment Block.

Below is detailed information on quantities of generated waste according to their type, provided together with comparison with the previous reporting period.



Properly managed electrical and electronic equipment waste

In the field of waste management, the principle of producer responsibility applies, where producers and importers are responsible for the environmental impact of products placed on the domestic market throughout their entire life cycle—from production to safe management of waste. The same principle applies to electrical and electronic equipment waste.

Organization of producers and importers of electronic equipment submitted to the Company the 2025 certificate confirming compliance with product waste management obligations. It confirms that electrical and electronic equipment waste was collected, prepared to be reused and recycled under EN 50625-1:2014, and the Company fulfilled its obligations.



Environmental engagement program for the employees

Company employees are engaged in environmental activities and programs, including management commitment, education, motivation and performance appraisal

Employees receive information through different channels: ORLEN Lietuva website, Company's Intranet, TV screens at the Company, email and other means.

Management engagement	Communication	Education	Motivation	Performance appraisal
• Strategy development • Management System Support (ISO 14001) • Environmental Committee activities • Financing of environmental activities • Personal involvement in environmental projects, events	• Environmental reporting system for sending notifications about environmental violations • Publication of environmental information on Intranet • LEAN meetings • Environmental publicity • Suggestion-book system • Publicity on pollution issues • Involving employees in decision-making processes	• Guide to promote the principles of sustainability • Environmental process regulations • Lectures, trainings • Articles • Trainings on sustainability issues • Events, campaigns • Printed materials • Video footage • Social partnership	• Awards for the best green ideas • Election of the most environmentally-active employee • Regulations on motivation system	• Level 3 inspections • Daily pollution control • Performance measurement (system of performance indicators)

Company employee motivation in the environmental sustainability area

In 2025, the program to promote engagement in environmental activities is being successfully continued. Since the beginning of 2024, the Provisions for Employee Motivation in the Environmental and Sustainability Area have come into force, under which departments and employees achieving the highest environmental performance indicators are identified annually.

The purpose of the document is to encourage the Company's employees to protect and conserve environmental resources, apply principles of sustainable and environmentally friendly behavior in their actions in order to reduce the potential negative impact of operations on the environment, as well as to identify departments and employees who have achieved the highest environmental performance indicators and to motivate them accordingly.

Key updates in the revised document: more ambitious targets for environmental activity and culture indicators have been set, and working groups have been given a new opportunity to increase their level of environmental activity if, together with a report on a hazardous location, they also provide evidence of reducing (eliminating) the environmental risk. Two categories of working groups exist: those related to administrative activities (a total of 30) and those related to production activities (a total of 25). The assessment period is from 1 January 2025 to 31 December 2025. The indicators measured include violations, environmental activity, environmental culture, and eco-driving. Several annual nominations are also awarded:



- Top Eco-Friendly Performer** - the Work Group that has achieved the best environmental performance results scoring the highest rate within the reporting period in the category of Work Groups engaged in administrative activities or in the category of Work Groups engaged in operational activities.
- Eco-Driver** - an employee of the Company driving a corporate car, who has achieved the best eco-driving rate in the reporting period.



Environmental damage indicators (rates)

Violation rate represents the level of identified environmental violations made by a work group within a reporting period. Goal of the year – 0 violations. This goal was achieved in 2025.



Environmental culture rate

Environmental culture indicator represents the level of involvement by a particular Work Group in the environmental initiatives (campaigns, lectures, educational events, contests, etc.) within a reporting period.

Objective:

R_K (administration) $\geq$ 40%
 R_K (production) $\geq$ 15%

Most Eco-friendly organizational units

In 2025, the most environmentally friendly groups related to administrative activities were: Occupational Health and Safety Department together with Process Safety Department and Integrated Management System Coordinator and Unified Staff Group of Operations Division No. 1 together with the Head of Operations Subdivision and his Deputy.

The most environmentally friendly production unit was Pipelines and Terminal Operations Subdivision.

What does it mean to be eco-driver?

Ecodriving rate (RV) represents the level of fuel consumption in view of the actual monthly fuel consumption and mileage made by each vehicle as well as the minimum monthly fuel consumption and maximum monthly mileage of the same vehicle brand. The goal is to encourage sustainable driving culture, i.e. driving in alignment with the dynamics of traffic flow while ensuring safety, maintaining the vehicle's condition and minimizing fuel consumption.

0

environmental violations in 2025.

304

participants

8

events
(campaigns, lectures, educations, contests)

-20%

level of engagement

Environmental proactiveness rate



Environmental proactiveness represents the level of reporting by a work group of environmental hazards and proposed opportunities for environmental improvement within a reporting period. The targets are set for each work group and provided in provisions. On average, 1-2 reports or opportunities for environmental improvement per ten employees are expected annually.

The Company provides opportunities for reporting on environmental improvement measures, violations, including environmental hazards on a dedicated platform. This allows for timely response and prevention of hazardous situations. Company employees are encouraged to reduce waste generation in processes. Opportunities are provided to propose ideas for optimization of production processes by using less feedstock and generating less waste. Responsible recycling and safe handling of hazardous substances is encouraged.

The link to the platform is available on the Company's Intranet. Company employees who have ideas may also share them via email: ekologija@orlenlietuva.lt



36

Reports on environmental hazards and opportunities for improvement

Incl:

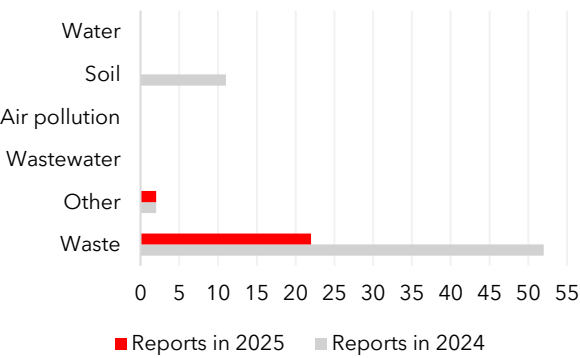
24

Environmental hazard reports
(2024: 65 reports)

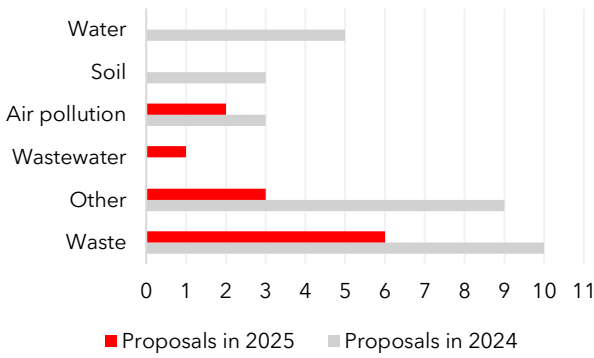
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Proposals for improvement
(2024: 30 reports)

Information on reports on environmental hazards based on type

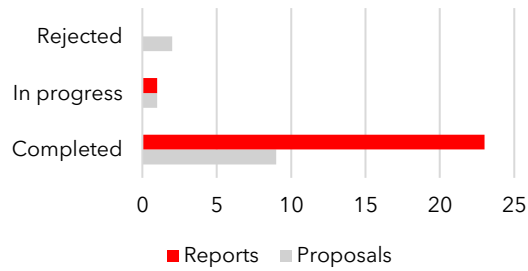


Proposals for improvement based on type



Status of reports, proposals in 2025

In 2025, 2 proposals were rejected, 9 were implemented and 1 is ongoing. 23 reports were implemented and 1 report is ongoing.



Environmental events

In 2025, ORLEN Lietuva organized different environmentally-friendly activities and events. Here is a summary of key environmental initiatives. Participation in the following events was taken into account when evaluating the level of involvement by a particular work group (based on Provisions for Employee Motivation in the Environmental Sustainability Area).



On 28 March 2025, Company employees were invited to participate in a Homes For Birds Campaign together with their children. The campaign was held near the refinery. Together with children, we contributed to nature's rebirth by helping returning birds build new cozy homes. 25 new bird homes were gifted to the forest together with employees of Ruzgai Forestry, a total of 13 participants.

In 2025, same as in 2024, Company employees were encourage to accept a challenge and test their knowledge in Waste Management Knowledge Contest. Participation in this contest was a chance to test knowledge about waste management, find out about daily sustainability practices by encouraging environmental awareness, shaping more-sustainable consumption habits.

A total of 108 Company employees participated in this contest. Out of 74 employees who submitted their assessments to the Environmental Department, the overall average was 17.85 points (out of 20), i.e. 1.8 points higher than in 2024. 15 Company employees achieved the maximum score.

At the end of May, employees of Būtingė Terminal and Biržai OTS together with representatives of contractor organizations gathered for the traditional Coastal Clean-up Campaign. This campaign reemphasized the environmental approach of Būtingė Terminal towards the environment where operations are carried out. More than 10 kilometers of Baltic Sea shore was cleaned-up, a total of 27 employees participated.

For a fourth year in a row, the Company encouraged employees to share moments from their holidays—descriptions, photos, videos—capturing moments of 'eco-friendly' leisure in 2025. The goal of this campaign is to encourage conscious approach towards the environment, cultivate eco-mindset and display creative ways of leisure without harm to the environment. 6 Company employees participate in this campaign. The only condition of the campaign is that leisure must be ecological, environmentally-friendly and nature-conserving.





On 24 October, International Day of Climate Action, National Environmental Exam was organized for four consecutive years. In 2025, greater involvement in this exam was evident compared to 2024. In 2024, 29 letters confirming participation in exam were received, of which 17 employees shared their scores. During the reporting period, 61 letters confirming participation in the exam were received, of which 51 employees shared their scores. The overall average of submitted scores on a scale of 20 points was 15.28 (in 2024 - 14.88). On 31 October, the colleagues who performed best in this exam were awarded.



In 2025, a Forest Immersion Campaign was also organized for Company employees during which conscious presence in the forest was practiced to strengthen the relationship with nature and discover internal balance. Unlike a usual walk, this activity encouraged to slow down and pay attention to the five senses: audible sounds, distinguishable smells, visible views, textures and taste. The session took place in Falsbergas Forest and was led by licensed therapists. A total of 25 employees participated in the Forest Immersion Campaign in 2025.



Sustainability starts with small steps that turn to significant changes. On 11 December, Company employees were invited to participate in lecture titled Climate as the Axis of Sustainability: From Global Challenges to Personal Decisions. Climate change problems and their effects were discussed, practical possibilities to make more sustainable decisions in everyday life were analyzed. The lecturer was a climatologist, TV host, sustainability educator and ambassador of the European Climate Pact. A total of 68 Company employees attended the lecture.



It is becoming a tradition at the Company to organize the Sustainable Workplace Christmas Decoration Contest. In 2025, this contest was held for the third time and received great interest from employees. The condition of the contest was to decorate the work place using natural, long-lasting and environmentally-friendly materials, choose energy-efficient lighting, use recycled or reusable items, etc. Employees were encourage to share their creativity and ideas by decorating their work space and capturing everything in photos or videos, descriptions, presentations. A total of 17 employees participated in the contest.

Other events, campaigns not included in the evaluation of environmental culture rate of the work group

Employees expanded their knowledge during hydrobiology training

On 26-27 August, lecture titled **Hydrobiology in the XXI Century: Solving Problems of Aquatic Ecosystems** took place at the Company and was led by scientists from Marine Research Institute of Klaipėda University. On the first day, participants delved into hydrobiology concepts, oxygen levels in bodies of water and characteristics of the Baltic Sea ecosystem. The second day was dedicated to aquatic microorganisms, their biodiversity, habitats, significance on environmental processes and research methodology.

This type of lectures improves employees' competences and deepens their understanding of aquatic ecosystem operation and relevant environmental challenges.



On 25-29 June, international initiative under project CLIMPS titled *Twinning for 2030 Climate Change Action Plan Model in Medium-Large Industrial Manufacturing Platforms* took place and was attended by an ORLEN Lietuva engineer (for sustainability). The project aims to promote the establishment of sustainable and climate-resistant industrial hubs, implementation of the Green Deal in medium- and large-scale production sectors.

Participants visited the Kocaeli Governorship, the Metropolitan Municipality, the Chamber of Commerce, the university, the TÜPRAŞ oil refinery, the MEXT Technology Center in Istanbul, the Turkish Chemical Manufacturers Association, and the GEBKIM Specialized Industrial Zone. During the visit, topics of circular economy and industrial greening were discussed, and new connections were established between business and municipal representatives from Turkey and Lithuania. Project CLIMPS was implemented under grant scheme of Town Twinning between Türkiye and EU-II (Twinning for a Green Future) program. It was funded by the European Union and the Republic of Turkey. The total budget was over EUR 109,000. The project was carried out until July 2025.



Photo source: <https://www.mazeikiai.lt/>

EU taxonomy

In 2025, just like in 2024, ORLEN Group prepared a consolidated Management Board's Report on the operations of the ORLEN Group and ORLEN S.A. It includes consolidated information on group's compliance with EU taxonomy requirements in accordance with Regulation (EU) 2020/852 of the European Parliament and of the Council and related delegated Regulations (EU) 2021/2139, (EU) 2023/2485, (EU) 2022/1214, (EU) 2023/2486, and other applicable legal acts. The consolidated information and calculation method of key performance indicators is available [here](#).

Since the Company collected data which were then used to prepare the consolidated report, this chapter provides only information about ORLEN Lietuva taxonomy activities, including associated income, capital expenditures (CAPEX) and operating expenses (OPEX). To contribute to taxonomy disclosure, in 2025, the Company carried out analysis of its activities in the following areas: climate change mitigation, climate change adaptation, the sustainable use and protection of water and marine resources, the transition to a circular economy, pollution prevention and control, the protection and restoration of biodiversity and ecosystems.

The Company voluntarily discloses information on the EU taxonomy, therefore, the data provided are not reported in accordance with the requirements of Regulation (EU) 2021/2178.

Identification and evaluation of taxonomy-aligned activities

In the second half of 2025, just like in 2024, the Company's taxonomy-eligible activities were identified based on the activity descriptions provided in the delegated regulations. NACE codes were used as additional information to identify the activities. Compliance of the activities with the taxonomy criteria was also assessed. The analysis showed that only a small share of the Company's economic activities qualifies as taxonomy-eligible under the six environmental objectives discussed above. Most of the identified taxonomy-eligible activities are related to the climate change mitigation objective.

It has been identified that:

- six activities contribute to climate change mitigation,
- one of the activities contributes to pollution prevention and control,
- one of the activities contributes to the transition to a circular economy.



In 2025, no completely taxonomy-aligned activity was identified. For this reason, the Do No Significant Harm (DNSH) criteria were not assessed, and compliance with minimum safeguards within the Company was not verified, as this assessment is carried out centrally for the entire ORLEN Group.

It is noteworthy that the Company's activities directly related to oil refining and based on fossil fuels were not classified as taxonomy-eligible activities, as these activities do not have the potential to contribute to environmental objectives. When assessing the eligibility of activities under the taxonomy, consultations were conducted with ORLEN Group employees when necessary, and consideration was given to the Frequently Asked Questions documents published by the European Commission. If the European Commission publishes new guidelines or clarifications in the future, these may have a direct impact on determining the eligibility of activities, as well as on assessing their compliance with the technical screening criteria.

Taxonomy-eligible activities during the 2025 financial year

Table 27 includes the Company’s taxonomy-eligible activities as specified in Commission Delegated Regulations (EU) 2021/2139 and (EU) 2023/2486.

Table 27. ORLEN Lietuva taxonomy-eligible activities in 2025

Climate change mitigation:
CCM 3.10: Manufacture of hydrogen
CCM 3.14: Manufacture of organic basic chemicals
CCM 4.29: Electricity generation from fossil gaseous fuels
CCM 5.1: Construction, extension and operation of water collection, treatment and supply systems
CCM 6.2: Freight rail transport
CCM 7.6: Installation, maintenance and repair of renewable energy technologies
Pollution prevention and control:
PPC 2.4: Remediation of contaminated sites and areas
Transition to a circular economy:
CE 2.2: Production of alternative water resources for purposes other than human consumption

In the analysis carried out in 2024, eight taxonomy-eligible activities were also identified. The main difference compared to the identification of taxonomy-eligible activities in 2025 is that the classification of one activity was revised: from NACE 4.1 Electricity generation using solar photovoltaic technology to NACE 7.6 Installation, maintenance and repair of renewable energy technologies, taking into account a comment from the parent company.

Calculation of key KPIs

The methodology for calculating the KPIs is presented in the consolidated report. The same methodology was applied when collecting information on OPEX, CAPEX, as well as revenues. This section presents the information that was used in preparing the consolidated group taxonomy disclosures. It is noteworthy that in the voluntary report, aggregated OPEX, CAPEX, and revenues are presented (related to the Company’s activities, i.e. including internal flows within ORLEN).

When providing data for the consolidated report, the share of activities, capital expenditures (CAPEX), and revenues related to ORLEN Group companies was additionally separated in order to avoid data duplication when calculating the total KPIs.

Non-taxonomy activities revenue, OPEX and CAPEX

Table 28 includes systemized non-taxonomy activities revenue, OPEX and CAPEX in 2025.

Table 28. Non-taxonomy activities revenue, OPEX and CAPEX

Indicator	Total Value	%	Total amount, thous. USD (according to IFRS)
Non-taxonomy activities revenue	6,005,038.79	98.97	6,067,341.69
Non-taxonomy CAPEX	137,576.95	78.36	175,565.59
Non-taxonomy OPEX	5,845,337.97	99.81	5,856,684.05

Key KPI indicators of taxonomy activities not aligned with taxonomy criteria

Tables 29–31 provide KPI indicators of taxonomy-eligible activities.

Table 29. Key KPI indicators of OPEX of taxonomy activities not aligned with taxonomy criteria

Taxonomy activity	thous. USD in 2025 (total)	% of total OPEX
CCM 3.10: Manufacture of hydrogen	745.21	0.013
CCM 3.14: Manufacture of organic basic chemicals	10.33	0.00018
CCM 4.29: Electricity generation from fossil gaseous fuels	3,079.82	0.053
CCM 5.1: Construction, extension and operation of water collection, treatment and supply systems	2,191.19	0.037
CCM 6.2: Freight rail transport	4,618.58	0.079
PPC 2.4: Remediation of contaminated sites and areas	700.95	0.012
Total:	11,346.07	

Table 30. Key KPI indicators of revenues of taxonomy activities not aligned with taxonomy criteria

Taxonomy activity	thous. USD in 2025 (total)	% from total revenue
CCM 3.14: Manufacture of organic basic chemicals	55,579.29	0.92
CCM 4.29: Electricity generation from fossil gaseous fuels	6,722.61	0.11
Total:	62,301.90	

Table 31. Key KPI indicators of CAPEX of taxonomy activities not aligned with taxonomy criteria

Taxonomy-eligible activities	thous. USD in 2025	% from total CAPEX	Taxonomy-aligned activities	thous. USD in 2025	% from total CAPEX
CCM 3.10: Manufacture of hydrogen	1,338.20	0.76	CCM 5.1: Construction, extension and operation of water collection, treatment and supply systems	1,025.90	0.58
CCM 3.14: Manufacture of organic basic chemicals	244.14	0.14	CCM 6.2: Freight rail transport	2,135.44	1.22
CCM 4.29: Electricity generation from fossil gaseous fuels	2,369.29	1.35	CCM 7.6: Installation, maintenance and repair of renewable energy technologies	30,875.67	17.59
Total:			37 988.64		

Key KPI indicators of taxonomy-aligned activities

Tables 32–35 provide KPI indicators of taxonomy activities aligned with taxonomy criteria.

Table 32. Key KPI indicators of OPEX of taxonomy-aligned activities

Taxonomy-aligned activities	thous. USD in 2025 (total)	% of total OPEX
CCM 3.10: Manufacture of hydrogen	0.00	0.00
CCM 3.14: Manufacture of organic basic chemicals	0.00	0.00
CCM 4.29: Electricity generation from fossil gaseous fuels	0.00	0.00
CCM 5.1: Construction, extension and operation of water collection, treatment and supply systems	0.00	0.00
CCM 6.2: Freight rail transport	0.00	0.00
PPC 2.4: Clean-up of polluted areas	0.00	0.00
Total:	0.00	

Table 33. Key KPI indicators of revenues of taxonomy-aligned activities

Taxonomy-aligned activities	thous. USD in 2025 (total)	% from total revenue
CCM 3.14: Manufacture of organic basic chemicals	0.00	0.00
CCM 4.29: Electricity generation from fossil gaseous fuels	0.00	0.00
Total:	0.00	

Table 34. Key KPI indicators of CAPEX of taxonomy-aligned activities

Taxonomy-aligned activities	thous. USD in 2025	% from total CAPEX	Taxonomy-aligned activities	thous. USD in 2025	% from total CAPEX
CCM 3.10: Manufacture of hydrogen	0.00	0.00	CCM 5.1: Construction, extension and operation of water collection, treatment and supply systems	0.00	0.00
CCM 3.14: Manufacture of organic basic chemicals	0.00	0.00	CCM 6.2: Freight rail transport	0.00	0.00
CCM 4.29: Electricity generation from fossil gaseous fuels	0.00	0.00	CCM 7.6: Installation, maintenance and repair of renewable energy technologies	0.00	0.00
Total:			0.00		



Social responsibility



Own workforce	56
Workers in the value chain	85
Affected communities	88
Key events, initiatives, training and recognitions in 2025	92





Own workforce

Human Resources in a nutshell

As of 31 December 2025, the Company employed 1,543 employees.



For comparison, in 2024 a total of 1,535 employees were employed, which was 8 fewer employees. During the reporting period, out of 1,543 employees, 2 men and 14 women were on parental leave (in 2024 – 11 employees on parental leave and 2 in military service). Table 35 presents the distribution of male and female employees in the Company by age. This data is published on the [Company's website](#).

Table 35. Distribution of male and female employees in the Company by age in 2025.

	Age, years					
	≥ 60	50-60	40-50	30-40	18-30	Up to 18
Men	154	423	224	195	122	0
Women	77	124	96	84	44	0
Total:	231	547	320	279	166	0

The Report also presents dynamics of the number of male and female employees working in the Company over the past five years. Data on the distribution of employees by gender is also publicly available on the Company's website.

Table 36. ORLEN Lietuva five-year dynamics of the number of male and female employees*

	2021	2022	2023	2024	2025
Men	1,038	1,044	1,094	1,113	1,118
Women	390	395	398	422	425

* as of 31 December of the respective reporting year

In accordance with the [ORLEN Group Human Rights Protection Policy](#), the nature of the work and the identified occupational risk factors at workplaces, the employment of minors is not permitted in the Company; therefore, neither previously nor in 2025 was any person under the age of 18 employed.

Employee retention rate over three years85%

Number of students who completed internships at the Company91

Incl: 32 Employees of the Company

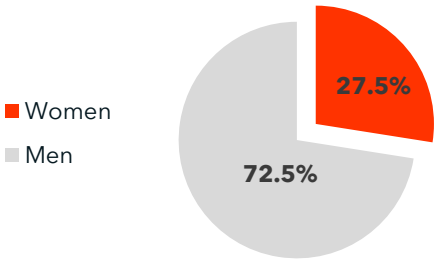
Employees who have completed Company-compensated studies10

Continue studies54

Career transitions within the Company64

More than 70% of the Company's employees are men, and the distribution of employees is significantly influenced by the nature of operations.

Employee distribution by gender:



In 2025, 151 new employees were hired
(2024: 164)

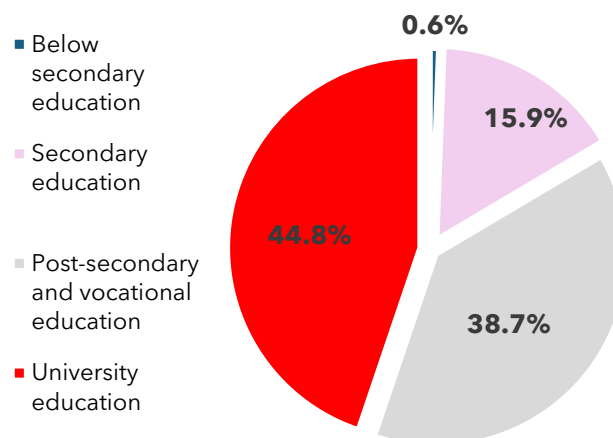
Average age of employees: **48.5**

Average length of employment years: **19 years**

Staff turnover: 6.2% (in December 2025)
(5.6% in December 2024)



Employee distribution by education:

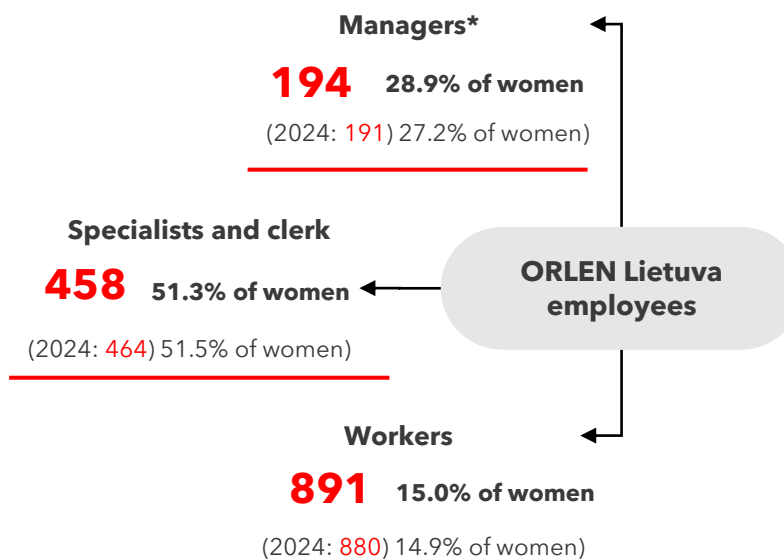


HR Policy

HR policy of the Company focuses on various areas:

- The targeted, consistent and equal opportunity-based recruitment and retention practices, strengthening the level of competences as well as the level of employee engagement, and ensuring high-quality working conditions and fair remuneration for the Company employees;
- Building an inclusive, open and supportive work culture and environment, adapting to the needs and expectations of employees across different generations, ensuring equal treatment of and supportive environment for all employees, regardless of their gender, nationality, language, ethnic origin, religion or belief, or views, especially when it comes to labor relations in the Company;
- Developing and mentoring of motivated employees, also training of specialists, by providing access to learning opportunities, participation in seminars, conferences, and trainings, as well as by engaging the experienced employees of the Company with training skills;
- Motivating employees to achieve the best performance, through regular planning and assessment of employees' activities;
- Strengthening the Company's employer brand among both potential and current staff members, to position the Company as an employer of choice now and in the future;
- Shaping an organizational culture that is built on the corporate values and drives for value creation;
- Improving labor efficiency to meet the objectives set by the shareholder.

Employee distribution



The Company's HR Policy is aligned with key international human rights standards, including the Universal Declaration of Human Rights, the core conventions of the International Labour Organization, the UN Guiding Principles on Business and Human Rights, the United Nations Global Compact principles, the OECD Guidelines for Multinational Enterprises, and others.

The Company has adopted specific policies aimed at preventing discrimination and harassment, and at promoting equal opportunities, diversity, and inclusion. This includes the Code of Ethics, Human Rights Protection Policy, Rules of Conduct, Regulations on Prevention of Mobbing, Discrimination, and Harassment. These documents clearly prohibit discrimination on all grounds protected under European Union and national legislation. Their implementation is defined through prevention, violation detection, and response procedures. Company policies related to employment are regularly reviewed and updated to ensure their fairness and gender neutrality.

The **ORLEN Group Code of Ethics** sets out clear, practical, and up-to-date guidelines defining the ethical standards applicable to all employees. They are based on the core values of the Company and the entire ORLEN Group - responsibility, development, people, energy and reliability. The Code also outlines the position regarding applicable ethical principles and standards, current scope of operations, business strategy, and expectations for business partners. The document promotes best practices in business ethics, integrity, and transparency.

The Company has adopted **Rules of Conduct** aimed at fostering a respectful and professional working environment, outlining workplace behavior guidelines and disciplinary measures



**Human Rights Protection Policy
in the ORLEN Capital Group**

November 2022



ORLEN Group Human Rights Protection Policy defines key operational and conduct principles governing the protection of human rights within the Company and in its relationships with stakeholders are defined. Actions are based on internal documents, national legislation, and internationally recognized standards and guidelines. Significant attention is given to employees' rights and well-being, the creation of an open and tolerant work environment, occupational health and safety, freedom of association, and cooperation with social partners. Prevention of child and forced labor and the prevention of discrimination, harassment, and other workplace violations is also ensured. The policy clearly establishes the ORLEN Group's position on forced and child labor - a zero-tolerance approach is applied to any forms of human rights abuse or violations. Any potential violation of human rights or conduct that does not meet the highest standards of business ethics is addressed firmly and without delay, and reported to the competent law enforcement authorities.

The Company also applies other rules regulating work organization and workplace conduct, including a motivation system and training procedures. This report mentions only a few of the main procedures: Employee Adaptation Rules, Employee Substitution Rules, Rules for Suspension from Work due to Alcohol Intoxication or Drug Intoxication, Regulations for Recruitment and Selection, Employee Reward Rules, Best Employee Elections, Rules for Remote Work, Workforce Age Management Rules, Mandatory Employee Training Rules, Rules for Organization of Employee Training, Annual Performance Conversation Rules, Regulations on Competency Model, Policy for Migration of Employees between Employers within ORLEN Group Companies, and Personnel's Potential Management Policy of ORLEN Capital Group, etc.

Procedures relevant to stakeholders are published on the **Company's website**. Employees can access all procedures governing work organization, conduct at work, provisions of the employee motivation system, and other documents on the Company's intranet.

The HR Department supports openness to change, diversity, feedback, learning from experience, employee initiative, and the strengthening of psychological safety in the workplace. Regular monitoring of employee statistical data is carried out in accordance with the referenced documents: Code of Ethics, Human Rights Protection Policy, Rules for Recruitment, Regulations on Prevention of Mobbing, Discrimination, and Harassment.

Principles of social responsibility

ORLEN Lietuva:

- Is committed to supporting the local community,
- Recognizes its capability and responsibility to contribute to the positive changes taking place in Lithuania,
- Develops social programs based on globally recognized social investment practices,
- Implements a social policy that addresses social challenges while aligning with business objectives

In implementing the principles of social responsibility, in each area of its operations the Company aims to:

- Developing and implementing systems to identify and manage risks and make effective decisions;
- Training and fostering the development of employees,
- Respecting the social, economic and cultural rights of stakeholders,
- Encouraging employee involvement is social responsibility initiatives,
- Consulting with stakeholder representatives on issues within the scope of their activity,
- Providing accurate, transparent and timely information about its operations,
- Following the principles of Global Compact,
- Applying policies, standards and operational practices to ensure continuous improvement,
- setting standards that exceed statutory requirements,
- evaluate operations based on the adopted principles and standards,
- share success by collaborating with stakeholders in relevant community development programs.

The relevant social responsibility principles are published on the Company's website: [ORLEN Lietuva](#).

Employee engagement, the importance of employees' opinions, and their impact on decision-making.

The Company considers employees' opinions to be a significant factor in creating a positive, inclusive and productive work environment. To ensure that decisions reflect the real needs and expectations of employees, systematic and regular employee engagement and feedback collection methods are applied.

Employee engagement is carried out through direct communication and internal channels, including organization of quarterly information days, various workshops, project-based activities, training, professional development sessions, and cross-departmental activities. Company's units are visited regularly, and meetings and discussions are organized. During these sessions, employees can express their opinions on relevant issues, submit suggestions, and provide feedback to management. This form of communication enables issues to be addressed promptly and supports well-informed decision-making. Department managers also organize regular meetings and discussions with their employees.

An inclusive work environment based on values, a culture of knowledge and experience sharing, and dialogue is strengthened through various initiatives and feedback mechanisms. A few of them:

- Employee engagement and satisfaction surveys,
- Activity of Trade Union and employee representatives,
- Information Days
- Expert Club,
- HR Pulse section on the Company's Intranet
- Employee recognition programs,
- Social events,
- Other initiatives that promote sharing of knowledge and experience.

The Company encourages employees to submit proposals for improving its operations through the *Kolibier* platform. The proposals are reviewed and, where possible, implemented. In December 2025, the provisions governing value creation initiatives under the *Kolibier* program and reward for their implementation were updated.

One of the changes to the rules is the replacement of the nomination "Most Eco-friendly Idea" with "Most Sustainable Idea". This nomination better reflects initiatives that contribute not only to environmental protection but also to other areas important to the Company. From now on, the "most sustainable idea" may relate to environmental, social sustainability, or sustainable governance.

Employee reward procedure and description of third category of initiatives were also updated.

Employee engagement survey

From November 17 to December 10, the Company conducted its fourth employee engagement survey, which was carried out by an independent external company. Employees actively participated in this survey - more than 85% of all employees took part (compared to 77% participation in the 2022 survey, when the engagement level reached 45%).

Level of employee engagement (2025) **54%**

Collected survey data was stored and analyzed in the database managed by the company conducting the survey, ensuring full confidentiality of responses. The Company received only aggregated results compiled from groups of no fewer than 10 respondents and presented in percentage terms; individual responses were not disclosed to the Company.

The survey results are used to assess employee satisfaction and motivation, identify strengths and areas for improvement, and support decision-making regarding working conditions, organizational culture, leadership, and collaboration. The obtained employee engagement survey results indicate a strong and steadily improving foundation for the Company's further development. The insights and suggestions expressed by employees clearly identify which areas are most important to them.

During the reporting period, more than 30 events were organized to enhance the employee engagement. More information about them is available in sections **Environmental Events** and **Key events, Initiatives, Training and Recognition in 2025**.

Annual performance conversations

Company managers conduct annual performance conversations with their direct subordinates each year. The purpose of these meetings is to foster employee engagement and initiative, strengthen their potential, and build a culture of open dialogue and feedback. During the conversation, the employee's annual performance, progress made, achieved goals, and contribution to the organization are reviewed. The employee's strengths, areas for improvement, competencies, and aspects of work organization are also assessed, including time management and collaboration. Development needs are identified, goals for the coming year are set, and future tasks and expectations are outlined. Active employee participation is encouraged during the meeting—their opinions, suggestions, and insights on improving work processes are heard and considered.

During 2025, 390 women and 1,052 men participated in annual performance conversations.

Incidents, complaints and human rights violations

During the reporting period, just as in 2024, no incidents, complaints, or serious consequences related to compliance with human rights were identified.

Disabled employees

Taking into account that the Company's activities are classified as potentially hazardous, and that the employment of persons with disabilities is regulated by legal requirements, the nature of the ORLEN Group's operations in certain positions limits the possibilities of employing individuals with various disabilities. But there are a few solutions to these problems:

- The Company may adjust working hours and responsibilities, taking into account the specific health conditions and individual needs of an employee with a disability,
- and may offer a reduced position scope accordingly,
- depending on the specific nature of the work, employees with disabilities may, where possible, choose a flexible work schedule or remote work,
- The Company's work spaces are adjusted to disabled people to ensure comfortable and safe working conditions.

9 disabled employees were hired by the Company.

(2024: 6 disabled employees)

In order to engage employees that are unable to move from their work place, the most high-traffic areas of the Company are equipped with screens. The screens display the latest information on HR Pulse and other relevant topics. Key events, initiatives, training and recognitions.

Diversity, gender equality

The Company has undertaken to ensure good work conditions to all employees despite their gender, age, race, religion, sexual orientation, disability or other beliefs. To develop a safe, healthy and inclusive work environment in accordance with high ethical standards, social responsibility policy is implemented, awareness initiatives are carried out, effective mechanisms of prevention, identification of, response to violations and grievances are applied. Special attention is given to employees that are part of higher vulnerability risk groups. Aforementioned principles are established in Human Rights Protection Policy and other Company's internal documents. No violations identified during the reporting period.

The Sustainability Policy foresees further strengthening of gender balance by creating just and equal employment, career and professional development opportunities. The Company continuously improves work conditions and eliminates potential barriers limiting women's employment. The implementation of this objective is also supported by inclusive language practices—job titles in job ads are selected to reflect gender diversity across departments. Clear and non-discriminatory criteria are applied in selection processes.

In cases where gender imbalance is identified in departments, job titles in job ads are selected based on distribution by gender: when there are fewer women, the feminine form of the job title is listed first, followed by the masculine; when there are fewer men, the masculine form is listed first, followed by the feminine.

No cases of gender discrimination or unfair pay were identified through the Company's complaint handle channels.

In this way, linguistic measures are used as one of the initiatives promoting gender equality. Ensuring equal opportunities in recruitment processes is a shared responsibility—each manager is required to confirm that consistent, non-discriminatory criteria were applied, that equal opportunity principles were followed, and that no inappropriate questions were asked.

The Company also promotes improving gender balance in roles that have historically been dominated by one gender, such as in the field of engineering. All candidates with the required competencies are encouraged to pursue technical roles regardless of gender. To achieve this objective, the Company collaborates with various institutions—from employment services to higher education institutions—encouraging students to choose their career paths based on their competencies and motivation. The Company participates in benchmarking initiatives and organizes training sessions, lectures, and discussions on gender equality, diversity, and inclusion. The principle of equal pay for equal or equivalent work is applied.

For the third consecutive year, the Company has participated in the International Day of Women and Girls in Science, highlighting the importance of science and gender equality and encouraging the pursuit of professional goals.

Prevention of violence and harassment at the Company

The Company is committed to ensuring a safe, respectful, and inclusive working environment by systematically reducing the risks of violence, harassment, discrimination, and mobbing. A zero-tolerance approach to any inappropriate behavior is applied throughout the entire value chain. The rules for the prevention of mobbing, discrimination, harassment, and violence apply to all employees, contractors, and third-party representatives, regardless of their position or workplace. The Company has established clear preventive measures, defined reporting channels, and response procedures. Incidents are handled in accordance with established processes: investigations are conducted, support is provided to affected individuals, and corrective actions are implemented. Potential violations can be reported anonymously or by contacting the ethics representative, HR department, Trade Union, or employee representatives.

Victims are provided with easily accessible support, including professional psychological help. The necessary human and financial resources are allocated to implement these activities, with cooperation from external experts and the use of technological solutions that ensure secure reporting. Progress is assessed using key indicators such as the number of incidents, the time taken to resolve them, and levels of employee satisfaction and engagement. Data is regularly analyzed and used to identify priority areas for improvement.

Responsibility for ensuring equal opportunities lies with the HR Director and the heads of other departments. Regular group meetings and individual discussions help to identify issues in a timely manner. The Company conducts regular audits and compliance checks, and the results are used to systematically improve processes, policies, and support mechanisms.

An important role is played by the employee-elected ethics representative, who advises employees, conducts awareness-raising activities, oversees the implementation of policies, and ensures impartial investigation of incidents. Annual reports present statistics, an overview of implemented activities, and set objectives for upcoming periods. Qualitative and quantitative information is reported annually to the HR department, ensuring transparency and accountability.

Employee awareness and education are a key focus. Training sessions, seminars, and practical workshops are organized to strengthen competencies in the prevention of violence and harassment. Information about the measures in place is communicated via the Intranet, email, and the Company's website.

The Company aims to ensure that all incidents related to violence and harassment in the workplace are resolved within one month or sooner. In 2025, four investigations into potential mobbing were conducted; however, systematic mobbing was not identified—only isolated interpersonal conflicts were recorded. For comparison, in 2024, four cases of violence and harassment were also registered, all of which were examined and resolved.

Training and skill improvement

Employee development remains one of the company's key HR priorities, focusing on strengthening employee potential, developing competencies, improving work quality, and increasing operational efficiency. The Company implements consistent age management practices aimed at reducing generational gaps and ensuring the transfer of experience. The activities of the training center are focused on adapting to a changing environment, including technological progress, operational modernization and generational change. Systematic competency development is considered one of the key conditions for ensuring organizational stability, with Company coaches and practical training supervisors playing an important role in this process. The Company leverages the expertise of long-serving employees, encouraging their involvement in mentoring activities and knowledge transfer to less experienced colleagues. To ensure business continuity, succession planning is carried out, and conditions are created for employee career development based on equal opportunity principles. Being part of an international group provides additional opportunities for professional growth.

Significant attention is given to employee attraction and integration: adaptation programs and Newcomer Days are organized to ensure smooth integration of new employees and a positive candidate experience during the recruitment process. The Company promotes employee engagement and loyalty by providing opportunities for professional and career development. Employees can participate in internal and external training, seminars, courses, and conferences, and are encouraged to pursue higher education, with the employer providing partial financial support. In response to evolving legal regulations, market conditions, and technological advances, continuous learning is becoming essential; therefore, employees are encouraged not only to maintain their existing knowledge but also to seek innovative solutions.

Particular attention is given to developing managerial competencies, especially in social, communication, and leadership areas: employees who advance to managerial positions often face challenges related to organizing and motivating their teams. Therefore, significant attention and resources are devoted to developing the social, communication, and leadership competencies of middle- and senior-level managers.

Training is delivered in various formats, including internal training sessions, external expert-led workshops, participation in external training and conferences, collaboration with other organizations, and, in exceptional cases, funding studies. Training needs are identified during performance review discussions, involving direct managers and the HR department, which assesses the justification for training and supports its organization.

The Company has a training center, a dedicated training budget, licenses for certain mandatory training programs, and employees trained in accordance with national requirements who provide training to other staff. Employee knowledge assessments (certifications) are conducted in written or electronic form using *ORACLE* or other software systems. Training administration, participant records, and certification results are recorded in *ORACLE* in accordance with internal procedures. The HR department is responsible for managing training information.



Employee training is carried out in accordance with internal rules on mandatory training and training organization, as well as the requirements of the legislation of the Republic of Lithuania. Taking into account the nature of the Company’s operations, employee training is organized in line with the requirements defined in job descriptions for the performance of work functions. Each employee is required to acquire the competencies necessary for their role, including mastering essential knowledge and passing exams or tests where required by legislation or internal training procedures. Each position has a defined individual timeframe for acquiring the required competencies. Where necessary, employees receive periodic additional training and certification. Progress is considered achieved when an employee has acquired all the competencies required to perform their functions.

Training effectiveness is evaluated through knowledge assessments, employee performance monitoring, feedback mechanisms, reporting systems, audits, and other internal control measures. Both short-term knowledge acquisition and long-term impact on performance results are assessed.

During the reporting period, the Company provided various training and skills development opportunities to all 1,543 employees. A total of 12,090 of different training sessions took place, including mandatory training (in 2024, a total of 15,304 of different training sessions took place). More than EUR 240,000 was allocated for training in 2025, and approximately EUR 280,500 is planned for 2026.

The Company collaborates with Lithuanian universities, colleges, vocational training institutions, and other educational organizations. In order to contribute to the development of future specialists, students are provided with opportunities to complete internships, become familiar with the Company’s activities, and, upon graduation, begin their professional careers within the Company.

Table 37. Information on employee studies

Employee studies	2024	2025
Started studies	7	13
Completed studies	10	10
Continue studies	41	54

Mandatory training under requirements of the Republic of Lithuania	417
SOFT* training	936
Qualification upgrading courses	352
Foreign language courses	52
Expert Club training sessions	1,020
Internal SOFT** training	3,995
Internal training programs	2,394
Acquisition (extension) of mandatory certificates	2,614

In view of the requirements of the applicable legislation as well as job descriptions and occupational risk assessment results, in 2025, employees of the Company attended the trainings in the areas of fire safety and civil protection, first aid and hygiene, information security, as well as trainings under the programs for energy employees, formal safety programs, and programs for execution of specialized works. Furthermore, over 1 employees of the Company attended the trainings and conferences to improve their project management, AI skills, also sustainability, foreign language, public speaking and other professional skills. Particular attention was given to gender equality, emotional health and resilience, protection of human rights, ethics, prevention of mobbing and discrimination, etc.

In 2025 m. Company further proceeded with the project of internal trainings *Expert Club. Refined Knowledge* intended for experience and knowledge exchange. Specialists and managers of the Company as well as invited guests acting as the experts prepared presentations, introduced various projects, presented new developments in business management area, briefed on the issues of stress management, time planning and management, also on procurement, occupational health and safety as well as process safety, quality management issues, etc. The trainings attended on voluntary basis by 1,020 participants are very popular among the Company's staff.

In 2025, SOFT training covered topics such as preparedness for civil resistance, prevention of mobbing, violence and harassment, equality and related issues, burnout, strengthening mental health in the workplace, stress, conflict and emotion control and management, collaboration, managing emotional resilience during change, motivation, and more. SOFT training also included topics such as process automation (artificial intelligence), sustainability, training for managers, production managers, middle managers and new managers, project management, competition law, labor relations, public speaking, and others.

Foreign language courses were organized in Polish, Lithuanian, and English, as well as English proficiency assessment (not included in the total number of language courses). Training topics organized within the *Expert Club* covered activities of the QA/QC Center, including standard research methods, quality management, defining workplace requirements, as well as labor law and other HR-related training.

In addition, training covered negotiation and procurement processes, effective time management, the importance of processes and occupational safety procedures in daily work, team emotional culture, stress management, motivation, burnout, accounting specifics, tax reforms, financial assets and liabilities, PIMS, IFRS, and similar topics. Newcomer Days are also organized to discuss the following topics: ecology, occupational safety, market, sales, supply chain management.

Internal SOFT training included ethics training programs, as well as training on risk management policy, anti-corruption and fraud prevention, prevention of violence and harassment, human rights protection policy, data protection (GDPR and information security), and sustainability training for managers. Other internal training programs included civil protection training, functional civil protection exercises for operators, professional development in the energy sector, and mandatory internal company training.

Training for obtaining (or renewing) mandatory certifications included fire safety, certification of energy sector employees, training and certification for operating potentially hazardous equipment, and training and certification for employees performing hazardous work (including the training program for managers of explosive and flammable production in the chemical industry), as well as vocational training and qualification upgrading for employees (upon hiring, transfer, or when acquiring additional competencies).

Qualification upgrading training included the following topics:

- environmental protection,
- personal data protection, cybersecurity, security officer training,
- laboratory performance quality improvement,
- energy efficiency challenges in companies, green energy and related issues,
- courses on safe driving,
- project management, TOC, risk management, audit, organization of internal audit of management system, process control challenges, etc.,
- process, safety, risk management and loss prevention training,
- accounting, taxes, etc.

109,316 hours - total training hours in 2025:

- **26,186** - total training hours of male participants
- **83,130** - total training hours of female participants

Participation in exhibitions and conferences, h **212**

Training hours **71**
average per employee YTD

- metrology, corrosion, estimate calculation, etc., mechanical training, maintenance training, electrical and automation training,
- OHS, occupational risk assessment, ergonomic risk assessment,
- document management, sustainability, legal requirements, HR management, IT, communication and other training related to professional development.

New test: Prevention of violence and harassment in the workplace

After Order Regarding approval of description of preventive measures against workplace violence and harassment of 17 December 2024 came into force on 1 January 2025, all employees, including those working remotely and in a hybrid mode, were required to familiarize themselves with the training material "Prevention of Violence and Harassment in the Workplace" and must pass a knowledge assessment test every three years.

Scope of collective agreements, social dialogue

Collective Agreement

Collective Agreement is the main document that governs the relationship between the Company and its employees. It defines the procedures for concluding, amending, and monitoring the implementation of the Collective Agreement, as well as the principles for concluding, modifying, and terminating employment contracts, remuneration, additional benefits granted to employees, leave, and matters related to its payment. Social partnership principles, work rules are established and matters of occupational safety, health and liability are governed. Valid Collective Agreement applies to all Company employees (in 2025, 1,543 employees worked at the Company). Provisions of the Collective Agreement governing the remuneration and allocation of additional benefits shall not apply to General Director of the Company and other employees of the Company elected to the Board of Directors of the Company. For Members of the Management Board, terms of remuneration established by the General Director and the Executive Members of the Board apply. All employees and social partners are included in the preparation of the Collective Agreement and monitoring of its implementation.



Naftininkų Trade Union (hereinafter, the NTU) is a voluntary, independent, self-governing and non-party organization that represents and protects labor, economic, social rights and interests of its members, operating in accordance with its approved Articles of Association and Code of Ethics. The Trade Union unites employees of ORLEN Lietuva, UAB ORLEN Service Lietuva, UAB ORLEN Apsauga, the Mažeikiai Polytechnic School, and other legal entities established on the basis of ORLEN Lietuva units, as well as employees of companies, institutions, and organizations whose admission to the Trade Union has been approved by the Council.

Social dialogue at the Company is based on search for compromise and strict compliance with principles. NTU consistently monitors the activities of European Works Council of ORLEN Group and the decisions it adopts that affect employees' working conditions. One of the Company employees has been elected to the European Works Council, ensuring official employee representation at the European level. NTU also invests in attraction of new leaders, development of their competencies, and maintenance of strong connections with members of Trade Union.

Trade Union acts as a strong equal social partner ensuring better work conditions and encouraging employee solidarity by mediating in collective bargaining with the employer, representing union members in labor disputes, and cooperating with employees and their representatives on various issues relevant to them. Also ensuring legal consultations, including advice on Labor Code matters, and actively participating within the ORLEN Group at the international level in initiatives and events organized by umbrella organizations and international partners, while showing solidarity with organizations and employees in other countries who defend their legitimate interests. In addition, organizing training sessions, events, and engaging in other related activities.

In 2025, social dialogue with the employer was smooth and constructive, and increase in number of members shows that employees appreciate Trade Union activities and benefits. 17 meetings of Trade Union and the employer's representatives as well as 3 meetings on discussing the Collective Agreement provisions took place in 2025. Collective Agreement concluded on 28 December 2021 with the NPS was extended until 31 December 2026.

Bipartite committees and commissions of the Company with their members, acting on a parity basis, being the administrative officials and employees delegated by the Trade Union bring benefits to both the employer and employees. Such form of cooperation is one of the ways to exercise the right of the employees' representatives to information and consultations as well as encourage the contribution of the staff members to the efficient management of human resources.

Currently, the following bipartite committees and commissions work in the Company:

- Occupational Health and Safety Committee. The main target of the Committee is to assist the employer in assuring healthy and safe working conditions while discussing the relevant safety issues.
- Employee Affairs Committee, examining employees' claims regarding establishment of key performance indicators. The purpose of the Committee is to examine claims regarding prescribed key performance indicators (KPI), i.e. when employee or group of employees does not agree with KPI proposed by their manager.
- Job Evaluation Commission, established for job evaluation pursuant to the provisions of Collective Agreement.
- Social Needs Fund Committee responsible for Administration of the Social Needs Fund resources.

In 2025, 633 ORLEN Lietuva employees were members of the NTU.

Adequate wages

All Company employees work under Employment Contracts. Base pay in the Company is governed by the Labor Code and the Collective Agreement, which applies to all employees (except for Members of the Board in terms of remuneration and additional benefits). The remuneration system of the Company comprises of the base salary (monthly salary or hourly wage), bonuses and premiums provided for by the applicable legislation as well as additional remuneration components agreed upon in the Collective Agreement such as monthly, quarterly, or annual bonus for achievement of targets, reward for the initiatives submitted, implemented, and recognized as rewardable, also management discretion bonuses for exceptional performance, annual bonus for the Company's performance results, etc. Apart from the bonuses and rewards under the Collective Agreement, the Company encouraged its employees by paying one-time bonuses on the occasions of Easter and 45th birthday of the Company as well as Christmas.

The remuneration system applied by the Company is based on job levels. Each year, the Company participates in the salary market surveys and, in view of their results, aims at paying competitive salary for its employees. Information on bonus systems applicable to the key management of the Company is available in Note **9.5.1.** of the Set of Annual Financial Statements.

The rapidly increasing minimum wage in the country poses a risk. The Company's policies and procedures related to employee remuneration and incentives are aligned with the Trade Union. The employer strives to respond to employees' needs and to implement different ways of working and cooperation.

Employee motivation system

Motivation system in the Company consists of several elements:

- Compensation system
- Additional benefits package
- Internal career opportunities
- Possibilities to improve qualifications and competences through participation in trainings and projects.

Risk may arise if Trade Union expectations are beyond employer's means.

Following the principles of social responsibility, the Company all employees receive wages higher than the state-established minimum wage, except for interns, whose remuneration may be set at the level of the minimum wage. Remuneration is periodically reviewed to ensure its competitiveness and fairness, and the Company's policies related to employment and compensation are also regularly reviewed. The aim is to ensure that salaries are gender-neutral and fair, guaranteeing that all employees receive equal pay for same work.

The ratio between the remuneration of the highest-paid individual and the median remuneration of employees (the highest-paid individual's total annual remuneration compared to the median total annual remuneration of all employees, excluding the highest-paid individual) reached 6.07 in 2025 (5.62 in 2024). The remuneration applies only employees working under Employment Contracts. To ensure data comparability, the remuneration of individuals who did not work the full year is recalculated on an annual basis. Additionally, to ensure comparability, salaries are converted to full-time equivalents. All employees who worked during the relevant year are included, regardless of the duration of their employment (except for Members of the Board).

Information on remuneration paid and due to the members of the Board of Directors and other members of key executive personnel of the Company is available in Note **10.5.1** of the Set of Annual Financial Statements.

Ensuring employment and social protection

All Company employees working under Employment Contracts are subject to social security and social insurance. Social security benefits are the same for all employees, except for the Voluntary Retirement Savings Scheme. The Company also offers a package of additional benefits offered by the Company under the Collective Agreement.

The year 2025 was also marked by the continuation of initiatives aimed at enhancing employee engagement: travel expenses to and from work were partially reimbursed for employees living at greater distances from the Company's premises.

At the end of the year, an evaluation is carried out, and during the year monitoring is conducted to compare and assess whether the employee turnover rate in this group has decreased. The measure is implemented to increase employee retention, motivation, and accessibility to the workplace.

Employees are also offered the opportunity to enjoy fresh fruit and coffee, and team-building events are organized, in which Company employees actively participate.

Additional benefits to Company employees:

Financial benefits:

- increased annual holiday pay, increased sickness benefit for the first two days of sick leave,
- increased severance pay in case of an employment contract termination by an employee of retirement age,
- additional allowance when an employment contract is terminated with an employee who, under the relevant conclusions given by the Disability and Working Capacity Assessment Office, is not able to work in previous position, or if the working capacity of the employee is determined as less than 55%,
- partial compensation of tuition fees and other costs for employees studying in university-type institutions,
- salary at 3 times higher rate paid to employees called to work on public holidays (if notified of the necessity less than 48 hours before the shift start),
- resources from the Social Needs Fund that may be allocated for Christmas gifts or Christmas events for the children of the Company employees, sponsoring summer time activities (camps) for the children of the Company employees, gifts or events for first-graders, support to Company employees in case of accident or other misfortune,

Insurance:

- Life insurance including benefits for family members,
- Health insurance,
- Contributions into the 3rd pillar pension funds,

Vacation (rest days):

- additional paid leave days for uninterrupted period of service,
- additional three-day paid leave in case of death of a family member or immediate relative,
- additional day of rest for the Company employees reaching employment duration of 25, 30, 35, 40 or 45 years
- paid study leave subject to Employer's consent,
- additional rest day for family duties.

Other benefits:

- Free transportation of the Company employees working in Juodeikiai and Stačkūnai from/to Mažeikiai and Biržai,
- Discount system for employees, including fuel discounts granted in ORLEN filling stations,
- Possibility to exercise/play sports at the Company (free gym, basketball, volleyball, football and tennis training),
- Event for the Company' employees reaching employment duration of 25, 30, 35, 40 or 45 years,
- Company-funded vaccinations against flu and tick-borne encephalitis,
- 7 sightseeing tours per year for staff teams or groups,
- Summer festivals for the employees and their family members,
- Internal and external training,
- Flexible work time – a possibility for day-time employees to come to work 7 a.m. - 9 a.m. and to leave earlier or later, respectively,
- The safest unit and best host elections.

Additionally, in 2025, the employees worked shorter hours on Family Day as well as Easter and Christmas Eve. Furthermore, employees of the Company have the opportunity to join the new employee discount platform PERKS taking advantage of more than 700 exclusive discounts for various goods and services.

Election of the Best Employees has become an annual event in the Company being another important element of the Company's motivation system. The title of the Best Employee is an honorable appreciation awarded for high professional and social achievements as well as exemplary and ethical behavior demonstrated both within and outside the Company in line with the Company's Core Values and Code of Ethics. Last year, 77 candidates were nominated by employees of the Company, with 1 employee awarded in the category 'Breakthrough of the Year', 4 employees in the category 'Colleague of the Year', 9 employees in the category 'Professional of the Year', and 2 employees in the category 'Experience of the Year'. Candidates for the 'Best Employee' category may be nominated by all Company employees, who, on their own initiative, collect the required number of signatures in support of the proposed colleague. Directors listed in the Company's management structure and their deputies, as well as the winners of the Best Employee awards from the past three years, may not be nominated as candidates for the 'Best Employee' category.



Working hours and work-life balance

The Company gives special attention to ensure work-life balance to create good conditions for employee welfare and efficient work. The main goals: optimize work time, reduce and monitor overtime, ensure sufficient rest, encourage use of accrued leave days and comply with the work-life schedule established by the law. Work time organization is based on compliance with legal regulations, also assessment of employees' needs.

In view of nature of work and individual needs, employees are, where possible, provided with the opportunity to work flexibly (with start and end times agreed with their superior). Employees may also work remotely, if needed and agreed with immediate superior. To ensure efficiency of such work models, investments are made in technological solutions and work tools, and the HR Department provides consultations when needed.

Work time is planned and monitored: balanced work schedules are made to ensure an even distribution of workload and to avoid fatigue. In staffing forecasts, workload, employee competencies, and the classification of job positions within the group are assessed. Quarterly reports are prepared on workload, overtime, and sickness absence. The actual number of hours worked is monitored, as well as the number of employees using flexible working hours and remote work options, compliance with legal requirements, etc. Progress is assessed using both quantitative (working hours, amount of overtime) and qualitative indicators (employee feedback, changes in health), with their dynamics monitored periodically.

Working time accounting processes are automated—alerts implemented in the ORACLE system help to identify and correct accounting errors in a timely manner. Responsible employees are appointed in each unit for working time accounting, while unit managers are accountable for its accuracy.

HR specialists check and assess the accuracy of records, and designated persons monitor overtime accounting and compliance with legal requirements. Managers also receive additional training on how to organize employees' working time in accordance with applicable regulations.

Internal audits are carried out at the Company, and cooperation with employee representatives (NTU) is maintained, with working conditions and their impact on employee well-being regularly assessed. Additional days off, planned training and other initiatives are discussed with the Trade Union.

Significant attention is paid to employee health and well-being. Wellness programs and team building activities are organized, stress management, time management skills and other important skills of employees are developed. Employees may use health insurance, which includes psychological aid. In the future, it is planned to invest in health enhancement initiatives related to rest, diet and physical activity, with regard to employee feedback and Company's performance.

The Company fosters a positive working environment by promoting employee recognition, professional development, and open communication. Employees are provided with opportunities to learn, improve their qualifications, and share knowledge—so far, no cases have been recorded where professional development has been hindered. Training sessions and seminars are also organized to help better balance work, personal time, and family responsibilities.

Additional measures tailored to individual needs are applied—for example, more favorable working conditions are provided for pregnant employees (greater opportunities for remote work, priority in selecting vacation time). Other benefits are mentioned on the previous page.

Additional initiatives implemented in 2025 included the option to take an extra day of leave for family commitments, the granting of loyalty leave, rest days for Company veterans, and more flexible opportunities for combining work and studies. During 2025, the right to additional rest day for employees raising children was exercised by 368 employees, with 26% female and 74% male employees.

To improve the efficiency of internal processes, the Company continued organizational changes in 2025: in Control and Security Department in February, Investment Department in August, Communication Department in September, and the extended functions as well as responsibilities of Legal Department in December.

The Company ensures equal rights to all employees irrespective of their personal qualities, complies with high ethical standards and applies efficient information and grievance mechanisms. During the reporting period, no cases of work-life balance violations or discriminatory behavior were identified.

Despite the applied measures, the main risk remains – lack of qualified workforce which would may lead to increased work load, reduced work quality and employee motivation, as well as higher staff turnover.

Occupational Health and Safety



Health and safety (OHS) is one of the Company's key operational priorities. To ensure a safe working environment, strict compliance with safety requirements is maintained, workplaces are continuously modernized, and significant investments are made in personal protective equipment and workwear. Particular emphasis is placed on safety training, accident prevention, and the supervision of ongoing activities, along with related measures. The Company works closely with the Trade Union and employee representatives to address both existing and potential impacts related to OHS requirements.



In 2008, the Company was awarded the OHS management system certificate OHSAS 18001:2007 (replaced by ISO 45001 in 2019), confirming that its OHS management system complies with best practice standards and ensures a high level of occupational safety. The management system is regularly monitored and continuously improved in collaboration with ORLEN S.A. and other ORLEN Group companies. All employees and contractors are actively engaged in improving OHS performance. The management system certificate is available [here](#).

Since 2012, the 'Safety First' program has been one of the Company's key initiatives to strengthen its safety culture. This is not merely a program name - it reflects the Company's mission and commitment to ensuring occupational health and safety across all areas of its operations. The Company's success is the result of long-term, consistent efforts. Following the launch of the programme, more than 70 initiatives aimed at improving OHS and process safety have been implemented, as outlined in this section of the report

A steady decrease in the number of workplace accidents has been observed. Record safety performance was achieved in 2020, with 702 consecutive days (over 7 million working hours) without a single accident involving either Company employees or contractors. Through sustained and consistent efforts, the Company aims to make safe working practices second nature and to encourage employees and contractors to be proactive and committed to the highest OHS standards. The 'Safety First' program continues to be improved.

The primary objective is to achieve and maintain zero workplace accidents.



Workplace accidents

The Company monitors the total recordable rate (TRR) and collects data on identified safety non-compliances.

The overall TRR, covering both Company and contractor employees, i.e. the number of accidents per 1 million hours worked, decreased to 0.42 in 2025. In recent years, the TRR has shown a consistent downward trend, decreasing from 1.26 in 2023 to 0.93 in 2024.

In 2025, a total of two workplace accidents involving Company employees were recorded, both related to walking. The first incident occurred when an operator supervising contractor maintenance work heard a call and, while running to the site, stepped onto an raised section of the concrete surface and tripped. Diagnosis: right ankle ligament tear. The second incident occurred when an employee of the Waste Water Treatment Shop fell while walking on a concrete surface, resulting in injuries to the palms. Cause of the accident: an uneven surface.

For comparison, four workplace accidents were recorded in 2024: 2 involving Company employees and 2 involving contractors.



2025:

- 0 serious and fatal accidents
- 0 accidents involving contractors
- 2 total workplace accidents recorded during the year

0.42

TRR

TRR = 0.93 (2024)

-54.8%

Maximum threshold: TRR = 1.7

OHS program ‘SAFETY FIRST’



Management involvement

The Company establishes occupational health and safety (OHS) objectives, continuously monitors and analyzes data, and sets annual targets to improve key performance indicators. The Occupational Health and Safety Department collects information on workplace accidents (involving both employees and contractors), calculates the TRR, compiles data on identified non-compliances, and performs related analyses. Health-related incidents and workplace accidents are analyzed to identify significant risks, while specialists assess the impact of working hours on employees’ physical and mental health. The Company’s objectives are largely aligned with those of the parent company, ORLEN S.A., as both organizations share the primary goal of zero workplace accidents.

Daily OHS briefings are conducted across the Company. Department managers are required to hold short OHS briefings each day (shift) before work begins. Suggested topics include: hazards related to regular and non-routine work activities; required collective and personal protective equipment; hazards and irregularities identified during the previous shift; supervision and control of contractor activities; verification of compliance with safety requirements specified in work permits and procedures; planned or ongoing hazardous work in the unit and adjacent units; and other relevant safety topics.

OHS initiatives

The Company has implemented the following key employee safety measures:

- Across all process units, the Company successfully uses an electronic work permit system (*E-permit*) and
- a computerized hazardous energy isolation (LOTO) system.

The *E-permit* system streamlines and simplifies work planning and execution by improving communication, standardizing requirements by work type, ensuring control of contractor certifications, minimizing the risk of human error, and reducing permit issuance time. In addition, it enables the storage of historical data.

The lockout and tagout (**LOTO**) system used to isolate, lock, and tag hazardous energy sources in equipment undergoing maintenance complies with the highest U.S. safety standards. It protects against the unintended release of hazardous energy and ensures maximum safety during maintenance activities.

Leidimas išduotas:
Leidimas galioja iki:

DARBAJ UŽDAROSE TALPOSE

ORLEN Lietuva

DARBŲ LEIDIMAS

Nr.:

Bendras rizikos lygis

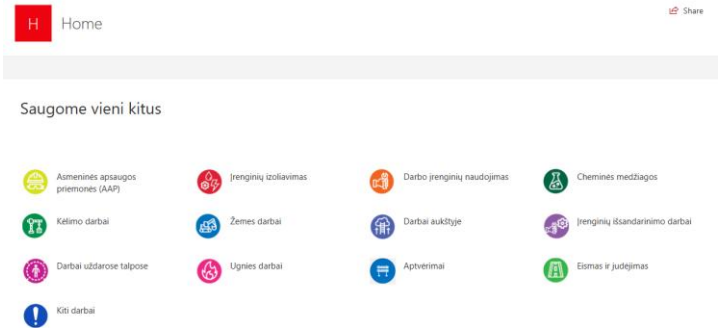
4

Leidimo rizikos lygis	1	2	3	4
Darbo sudėtingumas	Nesudėtingas	Nesudėtingas	Sudėtingas	Sudėtingas
Incidento tikimybė	Nedidelė	Vidutinė	Vidutinė	Didelė
Incidento sunkumas	Nedidelis	Vidutinis	Vidutinis	Didelis

Objektas	
Vieta	
Darbų aprašymas	
Rangovas	
Sutarties Nr.	

As of 1 July 2025, a further important step was taken with the introduction of the safe behavior monitoring program ‘SafeTogether’, aimed at strengthening proactive incident prevention. The core principle of this initiative is to encourage every employee to take ongoing responsibility not only for their own health and safety, but also for that of their colleagues. Employees are encouraged to be proactive and not to ignore situations that may pose risks to health and safety. Observations of safe and unsafe behavior are recorded in a dedicated electronic system.

As part of the implementation of this initiative, program rules for ‘SafeTogether’ were developed, and the Regulations for Employee Motivation in the Area of Occupational Health and Safety were updated, incorporating two additional programme-related performance indicators. In addition, a dedicated IT tool was developed to track monitoring results, and an awareness campaign was carried out, including the display of posters and communication via Company TV screens, the intranet, and other channels. These measures are expected to reduce the risk of workplace accidents and occupational diseases, promote safe behavior, strengthen the OHS culture, and foster responsibility for one’s own safety and that of others.



OHS Committee activities

An OHS Committee operates within the Company, carrying out continuous monitoring, review, and improvement of safety processes. The Committee’s primary objective is to support the employer in ensuring safe and healthy working conditions by addressing key occupational health and safety matters. The Committee consists of 4 employee health and safety representatives and 4 employer representatives. It operates in accordance with the approved OHS Committee regulations and holds meetings on a quarterly basis. During these meetings, key OHS issues are discussed, measures to improve safety are identified, and other OHS-related activities are carried out. In total, approximately 40 employee health and safety representatives have been elected across the Company.

Hazard reporting and elimination

Employees are encouraged to actively contribute to creating a safe working environment by reporting identified workplace hazards. The Company aims to involve as many employees as possible in this process and encourages a high level of reporting. To ensure that potential hazards are identified and addressed promptly, a dedicated IT system for reporting hazardous situations has been implemented. Through this system, employees can submit reports on identified hazards, enabling timely action to prevent potential incidents or accidents. The most active reporters are recognized and rewarded.

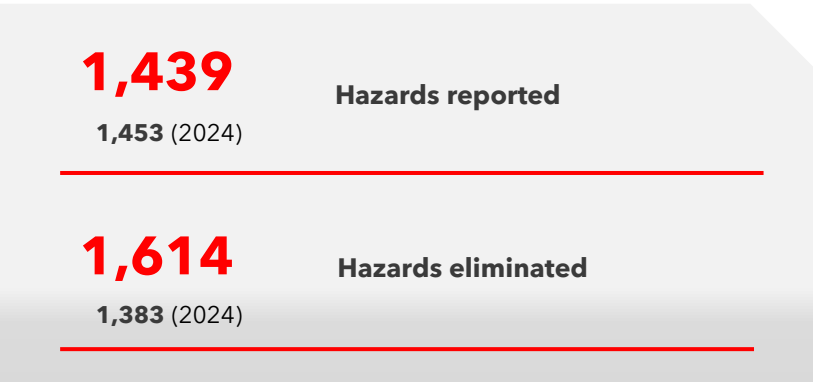
All reported cases are addressed without delay, and the necessary corrective actions are taken. Hazards that can be eliminated without significant financial resources are addressed immediately. For hazards requiring substantial investment, risk assessments are carried out in accordance with the Occupational Risk Assessment and Management Regulations. These assessments evaluate the potential impact on health, the likelihood of occurrence, and establish priorities for corrective actions. All identified hazards are periodically reviewed, and decisions are made regarding the implementation of appropriate safety measures.

Each month, employees are provided with information on reports received during the previous month and on workplace hazards that have been addressed. The information includes the number of hazards addressed during the previous month, the cumulative number addressed since the beginning of the year, and the cumulative number addressed since 2013, when the system was introduced.

From 2013 to the end of the reporting period, a total of 17,415 hazards were recorded. Of these, 16,578 were addressed, representing 95.2% of all recorded cases.

Funding for addressing the remaining identified workplace hazards is allocated through maintenance budgets.

Information and reported and eliminated hazards



Pranešimų apie pavojingą vietą registravimas

SAUGA SVARBIAUSIA!



Darbuotojų sauga ir sveikata



Pranešti apie pavojingą vietą



Analizatorių MX4 gedimų registravimas



Examples of hazards eliminated in 2025



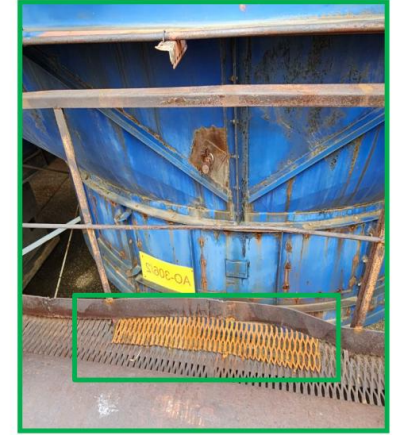
Installation of a safe walking surface



Repair of pipeline insulation



Repair of an opening in grating



Repair of an unsafe sewer well



Installation of a safety guardrail



Unsafe manhole fixed and marked





Three-level inspection system

The Company has implemented a three-level inspection system that ensures continuous risk analysis and prevention, as well as control of compliance with OHS requirements. This system enables the identification of OHS-related issues and achievements and supports the planning of improvement measures.

Level I inspections	Level II inspections	Level III inspections
Carried out by employees at their workplaces	Conducted by organizational unit managers at least once per month	Performed in accordance with an approved annual schedule

The three-level inspection system is used to:

- Identify **OHS non-compliances and their root causes**; define corrective and/or preventive actions, set deadlines, and assign responsible persons; record non-compliance reports; monitor the implementation of actions and assess their effectiveness.
- **Identify opportunities for OHS improvements**, define corrective actions, set implementation deadlines, assign responsible persons, and monitor the implementation of actions.

During Level I inspections, managers of organizational units must organize work so that employees inspect their assigned areas (workplaces) daily (each shift) and eliminate any identified hazards or non-compliances where possible. If an employee identifies a hazard that cannot be eliminated due to lack of competence, job duties, or other objective reasons (including time constraints), it must be recorded in the workplace hazard reporting system, and the manager must take immediate action, if necessary, to protect employees until the hazard is eliminated.

Level II inspections are conducted once per month by organizational unit managers within their respective units, based on selected thematic checklists. During inspections, a checklist relevant to the organizational unit is selected; however, over the course of the year, inspections must be carried out using all checklists applicable to that unit. The results of inspections are documented in the Occupational Health and Safety Inspection Report and recorded in the Company's *Doc-System*.

Level III inspections are carried out annually, covering all production units in accordance with an annual schedule approved by the Director of Quality, Labor Safety and Environment Control. These inspections are performed by a commission composed of Company management representatives and specialists.

In 2025, a total of 10 Level III OHS inspections were carried out in the following organizational units: Central Warehouse, Operations Subdivisions No. 1, No. 2 and No. 3, Quality Assessment/Quality Control Center, Petroleum Products Loading Shop, Pipeline and Terminal Operations Subdivision (Būtingė), Thermal Power Plant, and Waste Water Treatment Shop. During inspections, the following aspects are presented and reviewed: organizational structure and areas of activity; specifics of work organization; newly acquired equipment; implemented OHS improvement measures; achieved OHS performance indicators; existing issues and future plans; ongoing and planned projects; and production areas, premises, and equipment. In 2025, a total of 304 Level II OHS inspections were conducted and documented in the Company (compared to 311 in 2024).



Occupational risk assessment

The Company's objective is to ensure that all workplaces have up-to-date occupational risk assessments.

Occupational risk assessments are carried out in accordance with the Company's Occupational Risk Assessment Rules. Risks are evaluated for each job position, including physical, chemical, biological, ergonomic, psychosocial, and other factors. Assessments are conducted with the participation of employee representatives.

Key measurements are performed by the Company's Environmental Group, which is accredited in accordance with applicable requirements. Based on the results, occupational risk assessment cards are prepared, followed by the development of action plans for the elimination or reduction of identified risk factors. Occupational risk assessments are updated periodically, as well as in response to organizational changes. The approved procedures stipulate that, where risk mitigation measures require significant investment, a risk assessment matrix must be completed.

In the event of an occupational disease, the workplace is adapted to the employee's needs and, in accordance with legal requirements, appropriate compensation measures are applied.

In 2025, assessments of chemical and physical risk factors were carried out for employees in the following organizational units:

- Pump Houses No. 55 & 15 Section of Operations Subdivision No. 3;
- Gasoline and Diesel Blending and Fuel Preparation Section of Operations Subdivision No. 3;
- Chemical Water Treatment Unit of Thermal Power Plant;
- Power and Heating Energy Production Unit of Thermal Power Plant.

Employee health care

The Company provides medical care, organizes workplace vaccination programmes, improves ergonomic working conditions, and promotes employee participation in sports and physical activities. The Company has an agreement with a medical service provider that delivers first aid services, conducts preventive health examinations, provides vaccinations (including tick-borne encephalitis and influenza), as well as offers consultations and other necessary medical services, including periodic health check-ups.

An emergency response team is permanently on site and, when required, can reach any location across the facility within minutes by ambulance.

Employees are provided with appropriate conditions to make full use of rest breaks as stipulated by occupational health and safety legislation. Rest and active leisure areas have been established, including sports equipment, table football, massage chairs, fitness machines, and other well-being facilities.



Posters encouraging physical exercise are displayed throughout the Company's organizational units. Additional information is shared via the intranet, computer screen savers, including communications from health specialists and medical professionals. Healthy nutrition is promoted, and fresh fruit is regularly provided to employees.

The Company also actively promotes physical activity and a healthy lifestyle. Initiatives such as step challenges organized in cooperation with the WALK15 team have gained significant popularity, while employees are also encouraged to participate in the Sustainable Business League and ORLEN S.A. initiative 'Safe Steps in the ORLEN Group'. Further details are provided in the section on key events.

BŪK ŽVALUS - PADARYK MANKŠTĄ

Užtruksite tik 7 minutes





'SafeTogether' posters

In 2025, the Company prepared and distributed the 'SafeTogether' posters across its organizational units, highlighting typical situations that should be reported and recorded when identified. These posters are regularly displayed via computer screen savers.



Life-saving investment - acquisition of defibrillators

In 2025, the Company also purchased 17 automated external defibrillators (AEDs). These devices have been installed in buildings where the largest number of employees are present during working hours. They are placed in clearly visible and easily accessible locations. All AED locations are marked with dedicated signage providing basic information on their use. The entrances to the premises where AEDs are installed are also clearly marked. During first aid training, all Company employees are instructed on how to use AEDs and are familiarized with emergency response procedures, including responsibilities such as calling emergency services and performing resuscitation using an AED.

AID AUTOMATINIS IŠORINIS DEFIBRILIATORIUS	
	GARSIAI PAKALBINK IR PAPURTYK UŽ PEČIŲ - Nereaguoją - Nekvėpuoja arba tik pavieniai įkvėpimai
	SKAMBINK DISPEČERIUI 3333 arba +370 443 93333 (mobilioju telefonu)
	PRADĖK DARYTI KRŪTINĖS LĖSTOS PASPAUDIMUS - Apruoškink nukentėjusiojo krūtinę - Spausk krūtinės centrą bent 5 cm į gyį, 100 kartų per minutę dabnu
	ĮJUNK DEFIBRILIATORIŲ Laikykis defibriliatoriaus pateikiamų nurodymų, iki kol atvyks greitoji medicinos pagalba
	DARYK KRŪTINĖS PASPAUDIMUS, KAI P LIEPIA DEFIBRILIATORIUS





Procedures

Improvement of the OHS management system and OHS procedures

Due to organizational changes within the Company, as well as evolving OHS requirements and external audit recommendations, the OHS management system regulations are regularly reviewed and, where necessary, updated to ensure alignment with the current situation and applicable requirements.

Taking into account changes in legal requirements, as well as accidents and incidents, OHS and fire safety procedures are also reviewed and, where necessary, updated.

The Company's objective is to implement effective preventive measures to avoid workplace accidents and injuries, reduce risks arising from the working environment, as well as ensure the effectiveness and adequacy of the OHS management system.

Inspections conducted by the OHS Department

OHS Department specialists conduct inspections across all Company facilities. Thematic OHS inspections are carried out in accordance with established schedules, based on approved inspection checklists. In 2025, the Occupational Health and Safety Department conducted 374 thematic inspections using prepared checklists (438 in 2024).

OHS Department specialists recorded and documented 31 non-compliances and 131 improvement opportunities in the ORACLE system. During inspections, 222 OHS violations involving contractor employees were identified. For comparison, in 2024, 41 non-compliances and 547 improvement opportunities were recorded in the ORACLE system. A total of 80 OHS violations were identified during inspections, including 1 involving Company employees and 79 involving contractor employees.

Implementation of ORLEN S.A. recommendations

ORLEN S.A. periodically provides OHS standards, recommendations, and other documents related to employee and process safety. The Company's objective is to adopt best practices from the parent company. ORLEN Lietuva has implemented all 61 standards established by ORLEN S.A. The Company continues to improve and monitor the implementation of these standards, while also introducing newly issued requirements.

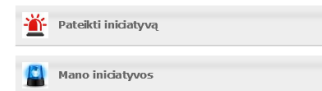
The effectiveness of occupational safety measures is evaluated through ongoing monitoring of OHS performance and regular audits, during which comprehensive safety status reports are prepared. Key performance indicators related to workplace accidents are monitored against established targets, enabling the assessment of the effectiveness of specific initiatives.

In addition, employee awareness is enhanced through training, further strengthening the safety culture. The causes of reported workplace accidents and identified hazards are thoroughly investigated. OHS performance assessments are conducted at the Company level, while strategic five-year action plans are developed at the ORLEN Group level.

The Company encourages employees to submit proposals for improving its operations through the *Kolibier* platform.



"PASIDALINK SAVO IDĖJOMIS!"





Employee motivation system in occupational health and safety

Every six months, the Company elects and rewards employees and organizational units that have demonstrated outstanding performance in the OHS area as part of its employee motivation system. The elections are organized in accordance with the Regulations for Employee Motivation in the Area of Occupational Health and Safety. The following nomination categories are established:

- Most active reporters of hazards
- Employees who eliminated the highest number of hazards
- Top safety-performing unit
- Top safety-performing unit manager

Since the beginning of 2024, new nomination categories have been introduced:

- Top safety-performing production units – the work team that achieved the best health and safety performance during the reporting period.
- Top safety-performing production unit owner – the manager of the work team recognized as the top safety-performing production unit.

Winners are awarded by the General Director and other members of management.

OHS indicators assessed:

- Number of workplace accidents,
- Number of days lost due to accidents,
- Number of violations,
- Completion of mandatory tests,
- Timeliness of health check-ups,
- Number of contractor accidents,
- Level of safety culture.

Two award events were organized in 2025, including the *Koliber* awards: one for the results of the second half of 2024 (5 January 2025) and another for the results of the first half of 2025 (16 July 2025).

In addition, the Company elects each year the top performing contractor. The winner is the contractor that, in accordance with AB ORLEN Lietuva Regulations on Motivation System for Contractors in Occupational Health and Safety Area, achieves the highest health and safety indicators. This performance indicator includes metrics such as workplace accidents, process safety incidents, violations, and hazard reporting.

Bonus payment system

In accordance with the Monthly Bonus Payment Regulations, employees are granted a monthly bonus. The amount of the bonus partly depends on OHS performance and may be reduced in cases where an employee violates OHS requirements.

A management bonus system is applied to employees holding key positions that contribute to the implementation of the Company's value creation strategy. The amount of the bonus depends on the frequency rate of workplace accidents, including those involving contractor employees.

Violation management system

The Company has established procedures for managing OHS non-compliances and violations. An OHS violation is defined as a failure by an employee to comply with applicable OHS requirements due to the employee's fault, for example, failure to use personal protective equipment, violations related to the issuance of work permits, or unsafe practices during hazardous work. OHS specialists record and document violations. Employees who violate OHS requirements are issued an OHS violation report and may have their monthly bonus reduced in accordance with the Monthly Bonus Payment Regulations.

High standards are also applied to contractors, with the aim of strengthening their safety culture and awareness. These measures are implemented on an ongoing basis.





Training

All Company employees are trained and instructed in accordance with the applicable legal requirements of the Republic of Lithuania. Internal rules for mandatory employee training and employee briefing procedures have been established, defining a comprehensive training framework.

Employees take tests annually via the *ORACLE* system, which records and stores results and sends reminders about upcoming tests. If employees fail to pass the tests within the established timeframe, their monthly bonus may be reduced.

In 2025, a total of 14 OHS regulatory documents were newly prepared, reviewed, and approved. For comparison, in 2024, sixteen OHS procedures were newly prepared, reviewed, and approved. In addition, the Employee Indoctrination Rules, Regulations for Employee Motivation in the Area of Occupational Health and Safety, Regulations for Occupational Health and Safety Inspections based on a Three-Level System, and Rules on Providing Employees with Personal Protective Equipment were updated and approved.

The Company's OHS documents are publicly available to all interested parties on the Company's website: [OHS Documents](#). Training is organized to ensure proper understanding and compliance.

Mandatory training

Mandatory OHS training is carried out in accordance with the Company's Employee Mandatory Training Rules. The following types of training and/or certification are conducted:

- Initial training,
- Periodic training,
- Additional training,
- Training for organizational unit managers,
- Training on operating potentially hazardous facilities,
- Training for hazardous works,
- Training for OHS Committee members,
- Training for employee OHS representatives.

General OHS tests

A list of mandatory OHS procedures has been prepared for each job position. Each employee is required to pass a test on the assigned OHS procedures every year (periodic training). Managers of organizational units are required to take these tests every three years.

Other OHS training

Additional training sessions are provided for employees, including topics such as psychological resilience, emotional well-being, and ergonomics.

Operator training is also conducted to enhance employee knowledge and provide up-to-date information; during these sessions, employees are also introduced to relevant OHS topics. OHS-related training is delivered by specialists from the OHS Department. Training is also provided for newly elected employee health and safety representatives (ambassadors). To further enhance their expertise, OHS specialists participate in regular training sessions.

Safety days

To enhance knowledge in occupational health and safety (OHS), the Company organizes Safety Days on the first Thursday of each month. During these events, training materials on relevant OHS topics and data on key performance indicators are presented. Managers of organizational units familiarize their teams with the Safety Day materials and discuss identified shortcomings, employee suggestions, and other relevant matters. Prepared presentations are displayed on TV monitors throughout the Company. The information is also shared via the intranet, distributed by email, and notifications about new monthly materials are sent to employees' work mobile phones.

In 2025, Company employees were introduced to the following key topics: emergency equipment; key OHS performance indicators for 2024; emotional and psychological safety; hazardous materials; noise exposure at work; prevention of slips, trips, and falls; working in hot conditions; preparedness for military and hybrid threats; prevention of explosive atmospheres; visibility and road safety; hazardous chemicals and mixtures commonly encountered in the Company; winter hazards and safety measures.



Communication

OHS communication measures

To promote OHS, communicate related issues effectively, and strengthen the safety culture, the Company uses a variety of communication channels targeting employees, contractors, and the media. Information for employees is provided via the Company's intranet, email, SMS messages, and internal radio system, as well as through posters, leaflets, and banners displayed across Company units. It is also presented during meetings, training sessions, competitions, quizzes, and other internal events. A significant amount of relevant information is displayed on monitors throughout the Company, including in organizational units, the canteen, and at the main entrance. Intranet communication is one of the most effective and timely ways of reaching employees; therefore, OHS-related information is shared as frequently as possible.

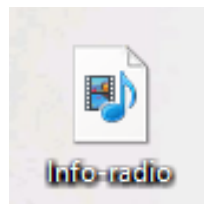
Information for contractors is communicated through similar channels, including email, the Company's website (<https://www.orkenlietuva.lt/>), as well as posters, leaflets, on-site monitors, online banners, and during meetings, training sessions, and competitions.

Information for the media and other stakeholders is disseminated via the Company's website, email, online banners, press conferences, media releases, guided facility tours, and presentations. It is also shared during various events such as seminars and emergency response exercises.

To strengthen employee engagement, the Company has elected employee health and safety representatives for each organizational unit or group of units (approximately 40 representatives in total). The objective is to enhance employee engagement and encourage active participation in improving OHS performance across the Company.

Periodic quantitative and qualitative surveys are conducted to assess employees' awareness of OHS and their views on safety conditions within the Company. The results are used to evaluate program implementation, improve the programme, and collect valuable data for safety management.

Public warning and information system



The Company regularly tests its public warning and information systems. Employees can receive emergency announcements in the workplace via the *Info-radio* system and internal loudspeakers. Additional notifications about system tests are sent to employees' mobile phones via SMS.

System tests are conducted on the first Monday of each month, as well as during national tests organized in accordance with the requirements of the Fire and Rescue Department under the Ministry of the Interior governing the maintenance of technical warning systems.





Other key OHS elements

Traffic safety

Traffic incidents occasionally occur on the Company’s premises. An analysis of the Company’s road safety situation has been conducted, and a Traffic Safety Committee has been established. The ongoing objective is to address road safety issues and to plan and implement measures to improve traffic safety.

According to data provided by UAB ORLEN Apsauga, 266 road safety violations were recorded in 2025 (197 in 2024).

PPE

Employees are provided with personal protective equipment (PPE), ensuring the timely and high-quality supply of necessary items.

In December, the Company completed a procurement process for work footwear aimed at selecting comfortable, ergonomic, and safety-compliant footwear models. Following a detailed evaluation and testing process, two models from different manufacturers were selected. This allows employees to choose the option best suited to their needs.

Work at height

There are areas within the Company where work at height is not always carried out safely, for example during the loading and unloading of petroleum products into and from railway tank cars. The objective is to ensure the safety of employees performing work at height. Planned actions include identifying locations where such work is performed unsafely and implementing appropriate safety measures.

Use of reflective items

Reflective elements are a small but vital detail that helps ensure the safety of pedestrians and cyclists in low-light conditions. As in previous years, reflective items were distributed free of charge to employees.

Golden Rules

The ‘Safety First’ program, which has been in place for many years, reflects the Company’s and its employees’ approach to occupational health and safety. The OHS Golden Rules, introduced in November 2024, remained in force in 2025.

It is expected that they will become an integral part of daily work and contribute to further improvements in safety performance. The Golden Rules are based on long-term experience, lessons learned, and the Company’s core values. Compliance with these rules makes a significant contribution to achieving the common objective of zero workplace accidents. The rules have been communicated to employees, and dedicated posters have been prepared and displayed in control rooms and other locations across the Company. The Golden Rules cover 14 different areas.



General Rules



Hot Works



Work Permits



Earthwork



Personal Protection Equipment



Confined Spaces



Tools and Equipment



Lifting Operations



Traffic



Equipment Unsealing



Lockout/Tagout



Chemical Substances



Line of Fire



Work at Height

OHS system effectiveness

All indicators defined in the OHS process cards of the integrated management system were achieved.



Further actions have been planned in accordance with the Occupational Health and Safety and Fire Safety Strategy Action Plan, approved on 25 November 2025 (Order No. TV1(1.2-1)-2025-0432, Annex 1). The plan includes a total of 41 measures, each with clearly defined tasks and actions. The areas covered include:

- Increasing management awareness,
- Increasing awareness among employees and contractors,
- Applying new methods, practices, and solutions used across various industrial sectors,
- Contractor management,
- Analysis of accidents, hazards and formulation of conclusions,
- Implementation of innovative safety solutions,
- Strengthening the preparedness of the Company's fire response units,
- Harmonization of preventive measures.

Implementation is scheduled for the period 2025-2030, depending on the specific measure. A responsible person is assigned to each measure.

Process safety

The Company's process safety system is designed to ensure operational continuity and maintain a high level of protection for people, the environment, and assets. It supports the reduction of the risk of major industrial accidents. The system focuses on preventing the release of oil, gas, and other hazardous substances into the environment, ensuring appropriate technical safeguards, and implementing measures to reduce both the likelihood and the impact of emergencies. In continuously improving process safety, the Company follows the SEVESO III Directive and applies international best practices.

Process safety encompasses 20 key elements, including process hazard and risk assessment, management of change, effective management and maintenance of mechanical equipment, incident investigation, and other safety measures.

Process safety activities in 2025:

9 (9 in 2024)	Updated process safety rules and procedures
11 (15 in 2024)	Newly prepared, reviewed, and approved process safety regulatory documents
6 (4 in 2024)	HAZOP studies conducted
230 (164 in 2024)	Improvement opportunities identified during HAZOP studies

In 2025, specialists from the Process Safety Department conducted 48 inspections of process units using checklists. A total of 121 improvement opportunities were identified, of which 91 have already been implemented. Analysis of historical incident data and measures implemented following HAZOP studies shows that, since 2017, the number of incidents has decreased by approximately 35%.

Reports and complaints from stakeholders

From 8 to 19 September 2025, representatives of state supervisory and control authorities conducted a planned inspection of the Company's upper-tier hazardous facilities. During the inspection, non-compliances and violations of legal requirements related to occupational and process safety were identified, and recommendations for improvement were provided:

- At the refinery, 6 violations were identified in the energy sector and 12 in fire safety area, 1 OHS-related requirement was issued.
- At the Būtingė Oil Terminal, 1 recommendation was issued in the area of industrial accident preparedness and civil protection.



Management of change, risk assessment

To manage changes in process equipment, the Company has implemented a management of change system. This system operates in accordance with the Regulations on Management of Changes related to Process Units, with the objective of ensuring that the impact of any change on process safety, OHS conditions, and the environment is fully assessed and that the necessary risk assessment is carried out. All changes to process equipment are reviewed by the Management of Change Committee, which decides on the further course of action. Assessments can be performed using several methods. Decisions may be taken by a designated committee (including risk assessment), or additional in-depth (engineering) analyses may be assigned to a responsible Company specialist. Group-based analyses such as What-If and HAZOP studies may also be applied. HAZOP analysis is considered the most comprehensive method.

In 2025, 2 What-If analyses were conducted, identifying 4 improvement opportunities. 76 change assessments were carried out, with recommendations issued. For comparison, in 2024, 2 What-If analyses were conducted, identifying 4 improvement opportunities, and 76 change assessments were carried out, with recommendations issued.



Explosion safety

To protect employees from exposure to hazardous chemical substances, the Company has equipped personnel with personal gas detectors. These devices are used in potentially hazardous areas where harmful concentrations of chemical substances may occur. Following the expiry of the previous gas detector lease agreement, a new contract was concluded to ensure continuous monitoring of hazardous gases in the workplace. The number of leased gas detectors was increased to 450 units. Recognizing the importance of these devices for safe and efficient operations, the Company ensures their ongoing maintenance.

In 2025, assessments of potentially explosive atmospheres and explosion risk evaluations were conducted at five process units. As a result, seven recommendations were issued.



Emergency preparedness

The Company has established an internal emergency response plan. Separate emergency response plans are prepared for each hazardous installation (approximately 25 plans in total).

Each year, emergency drills are conducted in accordance with an approved schedule, involving employees operating hazardous installations and emergency services (approximately 40 drills per year). Following the evaluation of employee actions, a drill report is prepared and improvement measures are identified.

In 2025, 47 functional civil protection exercises, 1 evacuation exercise and 1 civil protection drill were carried out. For comparison, 47 safety exercises were conducted in 2024.



Fire safety

To ensure fire safety, a dedicated unit of the Fire and Rescue Department operates within the Company – Mažeikiai Fire and Rescue Board for Protection of Facilities. Approximately 120 personnel are employed in this unit, equipped with the necessary resources and providing round-the-clock coverage. The Company has also established a Technical Fire Safety Committee, whose main functions include analyzing and evaluating the condition, adequacy, and effectiveness of fire safety measures, improving fire safety management, and providing recommendations.

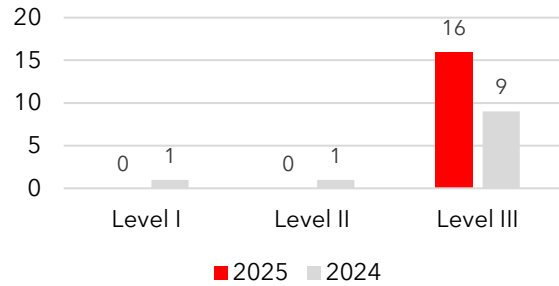
Incident investigation

The Company's health protection policy defines employee health protection as a strategic priority, particularly under challenging working conditions. Together with the ORLEN Group, the Company monitors incidents involving both its own employees and contractors. The aim is to keep the incident rate as low as possible by continuously promoting a safe and healthy working environment.

To prevent recurring errors and avoid similar incidents, the Company conducts thorough investigations and defines preventive measures. The incident investigation process is governed by the Company's Incident Investigation Regulations. All workplace accidents, as well as Tier 1 and Tier 2 process safety incidents, are additionally investigated using the root cause analysis method.

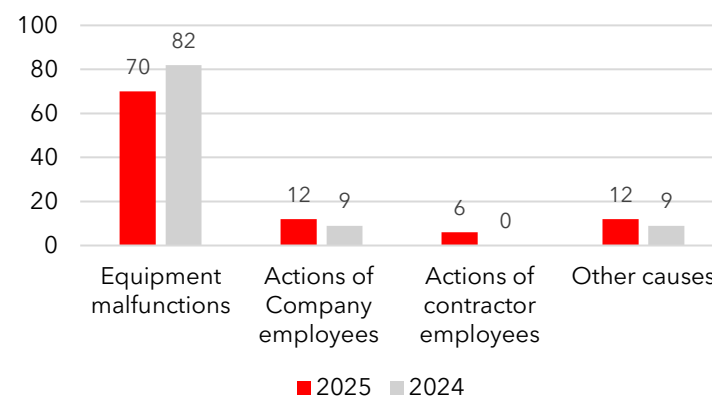
Incident investigation status, opportunities for improvement

Number of incidents by level:



In 2025, a total of 16 process safety incidents occurred in the Company, all classified as Tier 3 incidents. For comparison, in 2024, 11 process safety incidents were recorded: 1 Tier 1 incident, one Tier 2 incident and 9 Tier 3 incidents.

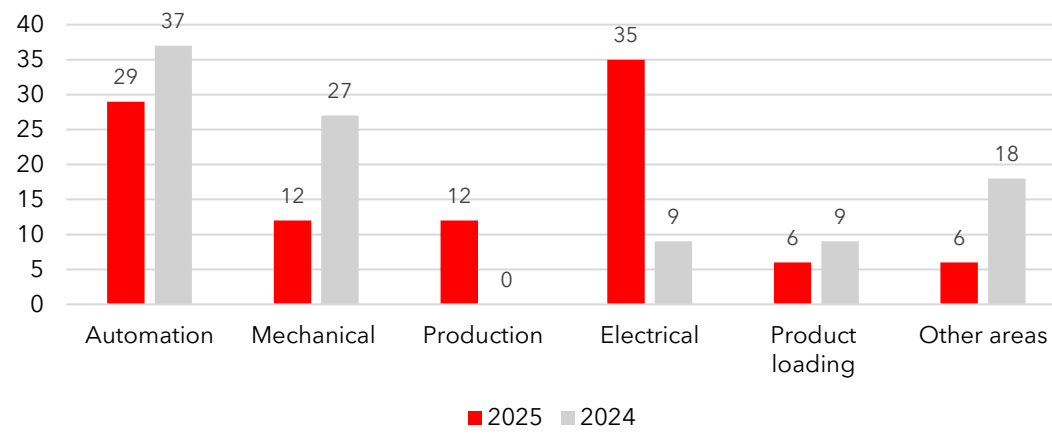
Incident causes (%):



A total of 38 opportunities for improvement were identified in incident investigation reports in 2025 (18 in 2024).

All incidents in 2025 were analyzed within the timelines established by the Company, their root causes were identified, and preventive measures were defined. The implementation of these measures is being carried out in accordance with the approved schedule.

Number of incidents by area (%):



Effectiveness of the process safety control system

All indicators defined in the process safety cards of the integrated management system were achieved.

In November 2025, the Process Safety Strategy Plan for 2025-2035 was prepared and approved. Further actions include the implementation of this plan, approved on 25 November 2025 (Order No. TV1(1.2-1)-2025-0432, Annex 2). The plan includes a total of 21 measures grouped into 6 key objectives, each supported by a detailed action plan. This report covers only ongoing tasks – the full action plan is presented in the relevant document. The planned measures focus on:

- Implementation of a process safety competency model, including policy and standards, and the introduction of a communication matrix,
- Implementation of process safety training programs, including the use of tools such as training and artificial intelligence to enhance employee knowledge,
- Introduction of programs encouraging employee initiatives in process safety improvement, as well as motivation measures such as competitions and incentive schemes,
- Implementation of a mechanical integrity and reliability management model, operational readiness procedures, process safety indicators, and further development of the management of change model,
- Application of analytical methods such as PHA, HAZOP, and LOPA. Implementation of integrated risk analysis methods (BRA, FERA, QRA) and review of the Safety Report based on updated QRA and FERA assessments, using previous HAZOP studies to identify hazardous scenarios. Application of artificial intelligence in identifying and managing process safety hazards, implementation of a contractor management model for process safety.

- Implementation of process safety innovations, encouragement of employee-driven safety initiatives, and use of artificial intelligence technologies,

The implementation period for the planned measures is 2025-2035, depending on the specific measure. A responsible person is assigned to each measure.

Workers in the value chain

Policies related to value chain workers

The attitudes, interests, and rights of the Company's value chain workers, as well as the protection of these rights, have a direct impact on the ORLEN Group's overall strategy and business model. Cooperation with suppliers and other value chain stakeholders is based on internal policies, applicable national legislation, and internationally recognized standards, such as the OECD Guidelines for Multinational Enterprises and the Ten Principles of the United Nations Global Compact. Further information is provided in the consolidated report. It should be noted that the Company has not independently entered into global agreements or established separate procedures in this area; instead, it applies commitments and frameworks defined at the Group level.

Cooperation with stakeholders is governed by the ORLEN Group **Supplier Code of Conduct**, updated in 2024, which partners and customers are required to acknowledge prior to entering into contractual relationships. This Code is a key instrument shaping value chain practices, setting out requirements related to reliability, energy use, development, responsibility, and other criteria aimed at continuous improvement.

Suppliers are subject to differentiated expectations depending on their size: large enterprises (more than 250 employees), medium-sized enterprises (51-250 employees), and small enterprises (up to 50 employees). All stakeholders are expected to assess the potential negative impacts of their activities and take appropriate measures to mitigate or eliminate them.

The Company evaluates suppliers to assess compliance with the Code of Conduct requirements; **however, these assessments are not yet sufficiently focused on sustainability aspects.** Priority evaluation areas include quality, timeliness, customer satisfaction, and communication. These evaluations help identify improvement areas and strengthen adherence to ethical principles. In addition, ORLEN Lietuva applies LEAN management principles, contributing to more efficient, transparent, and fair processes.

Suppliers and contractors participating in procurement processes are required to comply with a set of documents defining key expectations. This includes commitment to comply with the Supplier Code of Conduct, acknowledgment of the Human Rights Protection Policy, compliance with the Corruption Prevention Rules, and inclusion of relevant provisions in contracts. Submitted declarations and documentation form the basis for stakeholder evaluation. In response to identified or potential violations, the Company applies proportionate measures depending on their nature and severity, ranging from warnings to penalties, disqualification, or contract termination.

In response to evolving business models, the Company continues to develop responsible sourcing practices, giving priority to suppliers that respect workers' rights. Supplier diversification helps reduce risks associated with reliance on a single source and enhances supply chain transparency, flexibility, and resilience. At the same time, existing markets are expanded and new ones developed, with a focus on energy sector transformation, decarbonization, and value creation. Going forward, the Company plans to diversify supply sources where possible, avoiding dependence on a single supplier; carry out supplier due diligence; respond to customer feedback and complaints; cooperate with all value chain stakeholders, including public authorities.

Currently, the Company does not collect or monitor data on geographic regions or goods associated with an elevated risk of forced or compulsory labour, as such data has not previously been collected systematically. Identified material risks include: sourcing from suppliers that violate human and labour rights; sourcing from countries with low corruption perception indices; sourcing from sanctioned countries; sourcing from suppliers engaged in forced or child labour; and dependency on a single supplier. These risks may negatively affect the Company's reputation and business continuity.



The Company does not currently have a standalone policy specifically addressing issues such as human trafficking, forced labour, or compulsory labour. Instead, it applies the ORLEN Group Human Rights Protection Policy, which is based on international standards, including the Universal Declaration of Human Rights, ILO principles, and the UN Guiding Principles on Business and Human Rights. The Company does not tolerate forced or child labour, and anti-corruption provisions are incorporated into business contracts to reduce the risk of corruption and conflicts of interest.

It should also be noted that the Company currently does not apply systematic measures to identify vulnerable or marginalized groups within the value chain, as such a need has not been identified to date.

The Company may have an impact on various participants in the value chain, including workers employed by suppliers across different stages (e.g., feedstocks, bio-products, additives, electricity, equipment, spare parts), as well as employees working in logistics and service distribution. Potential impacts may also arise for workers exposed to geopolitical, environmental, or safety-related risks, such as supply chain disruptions, health and safety risks due to instability, resource shortages, or infrastructure constraints.

Information for stakeholders is provided through various channels, including the *CONNECT* procurement platform, the Company's website, and the intranet. An anonymous reporting system is also in place, and cooperation with trade unions ensures the protection of whistleblowers. These channels are publicly available and easily accessible. ORLEN Lietuva expects that individuals working within the value chain are aware of and trust these channels, as information about them is communicated to all suppliers and customers and included in supply contracts.

Customer satisfaction. Feedback from stakeholders

In 2025, the Company received 5 complaints from customers related to the execution of petroleum product sales agreements, compared to 16 complaints in 2024. This represents a 69% decrease, indicating that the implemented process control measures are contributing to more stable operations.

No reports were received regarding 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 individuals working within ORLEN Lietuva's value chain. Similarly, no reports were received concerning significant human rights violations or related incidents within supplier or customer value chains.

In 2025, cooperation was initiated with 68 new suppliers, further expanding the supplier base and ensuring competitive procurement conditions

(compared to 89 new suppliers in 2024).



The Company monitors its performance to manage any potential impact on value chain workers. This is supported by established grievance mechanisms (non-compliance reporting, complaints, and claims handling). Impact assessments, inspections, and internal audits are carried out to evaluate the effectiveness of the systems in place and to provide recommendations for their improvement. The Company collects customer feedback and requests additional information or data from suppliers and contractors, such as workplace accident statistics and work schedules, to ensure that contractors have sufficient personnel to perform their tasks and to prevent fatigue. The confidentiality and protection of whistleblowers reporting violations are governed by the Code of Ethics, the Human Rights Protection Policy, and the Rules on Anonymous Reporting of Irregularities.

The Company maintains close cooperation with the Trade Union, as well as with civil and non-governmental organizations in the regions where it operates, with the aim of promoting a diverse and inclusive workforce throughout its value chain. The Company also cooperates with the Lithuanian Confederation of Industrialists, LVK Investors, the Lithuanian and Polish Chamber of Commerce, national universities, and local communities. Through various initiatives and incentives, it contributes to improving working conditions and strengthening an ethical business environment.

Training sessions and seminars are organized for suppliers and customers, including supplier training programs. Cooperation with suppliers and customers focuses on benchmarking current production processes and practices and identifying opportunities for improvement. This cooperation is supported by supplier management systems and non-compliance reporting systems.

Performance of external suppliers

At the beginning of 2026, 133 suppliers were evaluated based on their performance in 2025. 96% of suppliers were assessed as reliable, with smooth cooperation. 1% were assessed as conditionally reliable and required improvement plans. 3% were assessed as unreliable and required to prepare improvement plans to address identified risks.

Suppliers are evaluated on a 0-100 scoring scale:

- 80 points and above - *acceptable supplier* - no improvement actions required,
- 60-79 points - *conditionally acceptable supplier* - a joint improvement plan must be developed to address identified issues,
- Below 60 points - *unacceptable supplier* - cooperation is not recommended. Suppliers are informed about potential disqualification from future procurement processes. To resume cooperation, a supplier must prepare and implement an improvement plan.

Contractor management

The Company has established a contractor evaluation and control system under which contractors operating at ORLEN Lietuva must comply with OHS requirements.

These requirements are published on the Company's website: [OHS requirements](#). In total, approximately 30 OHS procedures apply to contractor organizations. The main requirements are set out in the Health and Safety Procedure for Contractors [BDS-40](#).

The objective of contractor management is to promote safe working practices among contractors and ensure continuous improvement in safety performance. The Company plans to continue assessing contractors' OHS performance prior to selection; monitoring contractor activities; applying sanctions to contractors who fail to comply with requirements; evaluating the OHS performance of completed work; recognizing contractors demonstrating the highest safety standards.

Key requirements:

- Prior to commencing work under each contract, the contractor must submit all required OHS documentation and obtain formal approval,
- Contractors receive induction training every two years,
- Supervisors are tested annually,
- All work must be carried out under valid work permits,
- Contractors are periodically evaluated during selection,
- Contractors must ensure at least one OHS specialist per 50 employees.



General principles for affected communities

The Company operates in accordance with the highest standards of business ethics and social responsibility and maintains a positive reputation in the Mažeikiai region as the largest taxpayer and one of the largest employers. Financial statements are disclosed annually in accordance with high standards of transparency. The refinery, operating for over 46 years, plays an important role in the Baltic region, contributing significantly to energy security and independence.

ORLEN Lietuva maintains close relationships with local communities and actively cooperates across various areas, contributing to positive regional development. The impact of the Company's strategy and business model on communities is defined in its corporate social responsibility principles; integrated management system policy; occupational and process safety activities; human resources policies; environmental management practices. Wherever operations affect communities, the Company seeks to ensure respect for human rights. Relations with local communities are based on partnership, integrity, respect, and trust. The Company takes continuous steps to minimize potential negative impacts of its activities.

In accordance with Lithuanian legislation on charity and sponsorship, the Company cannot provide charitable assistance directly but may act as a sponsor. Establishing a dedicated charity fund would be required to carry out charitable activities; however, the Company has not established such a fund. To balance the impact of its operations and support stakeholders, the Company contributes to social well-being, with a particular focus on sponsorship activities carried out under its approved Sponsorship Policy. The Company actively maintains dialogue with communities, implements development projects, and enters into cooperation agreements where necessary.

The Company's operations span across various regions of Lithuania. Key stakeholders include residents of the Mažeikiai and Palanga regions, students, families, business organizations, non-governmental organizations, and municipalities. From a community perspective, the refinery site is not considered highly sensitive, as there are no residential buildings, schools, hospitals, or kindergartens in its immediate vicinity. However, despite this distance, potential negative impacts may arise, particularly through air emissions. In the event of major incidents, impacts could extend to the Baltic Sea region, for example in the case of an oil spill.

Regulations for Communication with Local Communities

In the first quarter of 2025, the Company adopted the Regulations for Communication with Local Communities. The purpose of this document is to ensure appropriate representation of the Company, alignment with its declared values, and to strengthen its image as a socially responsible partner and member of the community. The regulations were developed in line with the recommendations of ORLEN S.A.

Its key principles emphasize that relationships with communities are based on long-term partnership, dialogue, integrity, respect, and trust. The Company ensures that the public receives clear, accurate, and timely information about activities that may affect community life or the environment. In developing relationships with local communities and other stakeholders, the Company's Director of Communication acts in accordance with ORLEN Group recommendations. To enhance the scope, effectiveness, and impact of its activities, the Company may align its approach with ORLEN S.A. policies and implement joint initiatives. Taking into account its capabilities and financial position, the Company supports local community initiatives in the areas of education, culture, sports, and environmental protection, thereby contributing to the improvement of social well-being.

Coordination of activities, communication, and risk management

The Company's Director of Communication was responsible for organizing and coordinating relations with local communities and other stakeholders. The Director planned social initiatives, informed communities about operations and potential impacts, monitored the effectiveness of communication, and initiated improvements where necessary. The Director also prepared and regularly updated the stakeholder map, established interdisciplinary working groups for risk management, and initiated annual community perception surveys, the results of which were used to improve operations. Information for communities was provided via the Company's website, media, social networks, and meetings. Annual meetings are held with communities to assess the effectiveness of cooperation. The Director of Communication was responsible for decisions related to information dissemination and the organization of meetings.

Key actions for managing impacts and risks affecting communities

The Company follows the **ORLEN Group Sustainability Strategy for 2025-2035** and aims to ensure that employees provide local communities and other stakeholders with timely and accurate information on relevant aspects of the strategy. The Company ensures compliance with legal obligations toward local communities and other stakeholders, including ongoing monitoring of regulatory requirements. Efforts are made to minimize negative impacts, and cooperation is maintained with local authorities and public institutions.

Relations with affected communities are based on the principles of long-term partnership, trust, continuity, and mutual dialogue.

To effectively manage significant impacts and related risks affecting local communities, the Company appoints responsible persons to coordinate community engagement and stakeholder relations. Once communities are identified, a list of communication channels is established for regular interaction with each of them. This list is reviewed and updated annually and used to plan and implement communication activities. For interdisciplinary projects where risks to community relations are identified, interdisciplinary working groups may be formed. Their main task is to support project, event, or investment owners in mitigating and/or eliminating risks related to relations with local communities.

Systematic monitoring of community perceptions and concerns is currently not performed; instead, issues are addressed on a case-by-case basis in response to specific situations, requests, or similar circumstances. Internal compliance audits are conducted, along with risk assessments using the *Magique* risk management system. Action plans are in place to mitigate identified risks. Processes for determining when action should be taken and what measures are appropriate in response to actual or potential negative impacts on affected communities require further development.

When developing projects, environmental impact assessments (EIAs) are carried out in accordance with legal requirements, depending on the scope of the project. These assessments are mandatory for all new projects. Where relevant, EIAs include air dispersion and noise modelling.

The Company ensures that air emissions do not exceed applicable limits. During the EIA process, projects are presented to local communities, providing stakeholders with the opportunity to submit comments and recommendations. Authorized Company representatives review the submitted feedback and inform stakeholders of decisions taken and the rationale behind them.

Targeted measures are implemented to reduce noise and odor impacts. Where such impacts cannot be fully eliminated, corrective or compensatory measures are applied. The Company monitors the effectiveness of implemented projects by reviewing reports submitted by beneficiaries of financial support. Beneficiaries are legal entities receiving funding from ORLEN Lietuva for the implementation of various projects.

Negative impacts on local communities are mitigated through a range of measures, including implementation of modern technological solutions, investments contributing to local development, as well as awareness-raising and information campaigns on Company activities and projects. Special attention is given to maintaining open and continuous dialogue with local communities and their representatives, conducting detailed local analyses during project planning, and strengthening cooperation among teams responsible for investment planning and design.

Investments in modernization have the greatest impact on communities located near the refinery, the Būtingė Oil Terminal, and the Mockava Petroleum Products Terminal. The Company maintains close cooperation with local communities and assumes responsibility for addressing potential inconveniences or damage caused by its activities, including property damage.

Stakeholders have been actively involved in one of the largest investment projects in Lithuania financed by Polish capital – the construction of the Residue Hydrocracking Unit. This investment has had a significant impact on regional visibility, housing demand, business development, and investment attraction. In the fourth quarter of 2025, ORLEN Lietuva terminated contracts with the general contractor for the construction of this facility. This decision attracted significant attention from the public, politicians, and the media. The situation was managed professionally, maintaining the Company's reputational stability.

Remediation processes and channels for affected communities to raise concerns

All members of affected communities who may experience negative impacts from the Company's activities have access to the previously described reporting channels. Affected communities may also submit their concerns and requests directly via email at post@orlenlietuva.lt. To protect individuals using reporting channels from potential retaliation, the Company ensures the confidential handling of complaints and compliance with privacy and data protection requirements, as set out in the Rules on Anonymous Reporting of Irregularities. The available channels ensure anonymity, while internal policies, such as the Code of Ethics, provide protection for whistleblowers against potential retaliatory actions.

In 2025, no reports were received regarding increased pollution, noise, or other negative impacts. In the event of complaints, the Company takes all necessary measures to investigate them and implement appropriate preventive actions. Such reports are recorded in the Environmental Department's register. The Company also operates a system that allows employees to report environmental hazards – the same system used to register hazards related to employees and work activities. No reports related to these factors were recorded in this system in 2025.

Partnerships, education, and community engagement

To attract new employees, the Company actively cooperates with educational institutions, including universities, colleges, vocational training schools, and other organizations. Partnerships are developed with Kaunas University of Technology, the Faculty of Chemistry and Geosciences at Vilnius University, VILNIUS TECH, Šiauliai State College, Klaipėda University, and other institutions. Students are provided with opportunities to complete internships, gain practical experience in a real work environment, and join the Company after graduation. In 2025, a total of 91 students completed internships at the Company (including 32 Company employees who were also students). Interns came from Kaunas University of Technology, Vytautas Magnus University, Vilnius University, VILNIUS TECH, colleges in Vilnius, Šiauliai, and Klaipėda, Mažeikiai Polytechnic School, and other institutions.

Cooperation with the Mažeikiai Polytechnic School is being strengthened by supporting high-performing and motivated students through scholarships and educational initiatives.



kauno technologijos universitetas



Klaipėdos universitetas



In 2025, the Company recorded a high number of visits from representatives of educational institutions, as well as students, pupils, and other target groups. A total of 684 participants, including students, pupils, and representatives of academic institutions of various age groups, took part in guided tours and meetings with the staff of HR, Technology Departments, representatives of operations and laboratories. In addition to educational groups, tours were also organized for other target audiences, including business organizations, social partners, associations, and representatives of the police, NATO, and other institutions. Over the course of the year, the Company hosted more than 600 representatives from these groups. The Company also organized its first dedicated tour for people with hearing impairments.

In 2025, the following educational institutions participated in tours of the Company:

- Mažeikiai Ventos Progymnasium
- KTU Engineering Lyceum
- Mažeikiai Merkelis Račkauskas Gymnasium and *Nordplus* sustainability project
- Mažeikiai Ventos Progymnasium
- Židikai Gymnasium
- Mažeikiai Vyturys Primary School
- Šiauliai State College
- Mažeikiai Kalnėnai Progymnasium together with Telšiai Progymnasium
- Šiauliai Gegužiai Progymnasium
- Vilnius University
- Šiauliai Julius Janonis Gymnasium Utena Dauniškis Gymnasium
- Kaunas University of Technology (KTU) and Riga Technical University
- Šiauliai Romuva Gymnasium
- Mažeikiai Polytechnic School
- Seda Vytautas Mačernis Gymnasium
- Mažeikiai Polytechnic School

In 2025, as part of its social responsibility activities, the Company established partnerships with the following social partners:

- Public Institution *Vilties Erdvė*
- Association *Red Noses Clown Doctors*
- *Vieکشnai* Children's Day Center supported by the Order of Malta
- Mažeikiai Children's Day Center of Social Services
- Mažeikiai Children and Youth Multifunctional Center
- Social Workshops of the Mažeikiai Center for Disabled People
- National Blood Center, Klaipėda Branch
- Mažeikiai Regional Unit of State Forest Agency
- Mažeikiai Museum
- Mažeikiai Art School
- Running Club *Penki Kalnai*
- Public Institution *Vaikų Linija*
- Association *Kuriame Kartu*.

In 2025, more than 40 meetings were held with local communities and stakeholders. The main objective of this cooperation is not only to build relationships and better understand stakeholders' needs, but also to actively involve them in ORLEN Lietuva's activities, events, and projects. Five meetings were organized with the Mayor of Mažeikiai District Municipality and the municipal administration team, as well as with the Mayor of Telšiai. Two additional meetings were held with the local community of Pikeliai village. More than 10 meetings were organized at the Mažeikiai Museum, in the *Journey of Oil* exhibition hall.

Long-term partnerships are maintained with local disability organizations and children's day-care centers. In 2025, 3 projects were implemented with Public Institution *Vilties Erdvė*, 2 projects with the Viekšniai branch of the Order of Malta, 3 projects with Mažeikiai Regional Unit of State Forest Agency, and 3 projects with the Children and Youth Multifunctional Center. The Company also cooperates with local scout communities and running clubs.

As part of the Museum project, educational institutions were actively engaged. The Deputy Director of Communication met with the heads of all educational institutions in the city, including kindergartens, progymnasiums, and gymnasiums. A separate meeting was held with the community in the region where the Būtingė Terminal operates, as well as with the Mayor of Neringa. Strong relationships were also established with the Mažeikiai Tourism Information Center, regional Rotary organizations, and local cultural institutions, including the Culture Department and the Cultural Center.

During the opening of the exhibition *Mažeikiai Through Time*, photographers who had restored historical images were invited to ORLEN Lietuva. Close cooperation was established with the local photography community – their work was exhibited at the refinery, and photographers were invited to participate in Company events.

To strengthen brand awareness and reinforce the Company's image as a responsible social partner, representatives of the Company and the Mažeikiai Museum participated in a radio programme discussing the refinery's historical impact on the development of Mažeikiai. Positive coverage was also published in the local newspaper *Santarvė*, on the Mažeikiai District Municipality website, on social media platforms, and in local news portals such as *etaplus.lt*, *zemaitijosgidas.lt*, and *regionunaujienos.lt*. In total, 15 positive media publications and broadcasts (including radio programmes and online content) were released during the year. These publications covered topics such as the refinery's history, social responsibility initiatives, projects and events, financial performance, and investments.

In 2025, the project to redesign the ORLEN Lietuva website and develop new websites for subsidiaries in Latvia and Estonia was nearly completed. The website was developed based on the existing www.orlen.pl template, optimized for mobile devices, and designed to meet accessibility requirements for people with disabilities. New sections were also created in response to needs identified in sales activities during 2025. The project was implemented in close cooperation with the ORLEN S.A. Corporate Digital Communication team. Prior to launch, only minor tasks remain – finalizing visual content (photos) and reviewing and aligning content with relevant ORLEN Lietuva departments to ensure accuracy and relevance. The new websites are planned to be launched in Q1 2026 and will be accessible to all users.

In addition to the initiatives described above, the Company regularly promotes social initiatives via its intranet. Employees are encouraged to participate in awareness campaigns related to emotional well-being, such as *Green Light for Life 25*, engage in meaningful conversations, and support organizations such as *Jaunimo Linija*.

The intranet also promoted participation in the *Sustainable Employee* physical activity program introduced by the Mažeikiai Public Health Bureau. This program focuses on developing healthy habits. Participants learned simple but effective exercises to reduce muscle tension, physical and eye strain, improve posture, and enhance overall well-being, with a strong focus on applicability in the work environment. Each session lasted approximately 30 minutes, with a total of 10 sessions.

Employees were also encouraged to mark World Down Syndrome Day. The initiative aimed to raise awareness of diversity and highlight that every individual is unique and valuable. On 21 March, employees were encouraged to wear mismatched socks as a symbol of support and inclusion for people with Down syndrome and their families. This initiative also demonstrates a commitment to building an open and inclusive community.

In February 2025, the Company organized an event dedicated to the International Day of Women and Girls in Science, attended by students from Merkelis Račkauskas Gymnasium. During the event, sustainability topics and environmental issues were discussed, including analysis of water quality in the Venta River.

The Company also offered employees and their families free access to the Mažeikiai Ice Arena three times per week during February.

The Company supported the 19th International Mažeikiai Art Festival, the sacred art and heritage symposium *Versmės*, and acted as a prize sponsor for the *Baltic Voice 2025* concert.

In addition to events provided under the Collective Agreement, new initiatives related to sustainability and social responsibility were introduced for employees. Some initiatives (such as bird return celebrations and birdhouse-building events) are presented in the **Environmental Activities** section. This section provides a concise overview of other key events, initiatives, training activities, and awards related to the Company's employees and local communities.

Blood donation campaigns

A mobile blood donation team visits the refinery several times a year. All employees are invited to participate in these campaigns, including both experienced donors and first-time participants. Blood donation campaigns continue to attract an increasing number of employees. Representatives of the National Blood Center note that the Company is one of the largest corporate blood donors. In 2025, four blood donation campaigns were organized at the Company.



ORLEN Lietuva Children's Space-Themed Christmas Celebration and the Sharing Kindness Campaign

On 3 December, the volunteer initiative 'Sharing Kindness' took place, with employees gathering to pack gifts for children. On 7 December, children of Company employees under the age of ten were invited to the Mažeikiai Culture Center, where the event 'Christmas... and Santa in Space' was held. During the event, children received gifts prepared as part of the 'Sharing Kindness' campaign. To support the goals set out in the ORLEN sustainability strategy, the Company procured gifts in cooperation with social partners.

The partners include the organizers of the cultural project 'Versmės', Public Institution *Vilties Erdvė*, supporting people with physical and mental disabilities and other organizations in the Mažeikiai and Klaipėda regions.



Key events, initiatives, training and recognitions in 2025

At least twice a year, employees participated in forest walks with scouts and forest therapy sessions.

On 10 May, employees took part in a day hike along the *Camino Lituano* route (Pikeliai-Ritinė-Lušė-Dautarai-Židikai, 21.2 km). During the hike, participants visited Dautarai Manor and the Šatrijos Ragana Memorial Museum. Following Mass and a brief introduction to the Holy Trinity Church in Pikeliai, participants were introduced to the principles of mindful walking and environmental awareness.

Historical sites such as a monument to Vytautas the Great, a memorial to plague victims, a remembrance alley, and a Jewish cemetery were visited. Later, a group picnic was held at Dautarai Manor Park. Participants joined an educational programme on ecology and environmental protection, learned about local flora and fauna, installed birdhouses, and explored local history. The event also strengthened teamwork and fostered social connections. After the hike, participants gathered at the Pikeliai Nature Courtyard to share impressions and enjoy traditional food, including local dishes and a cultural programme featuring folk music and dance. The event offered an opportunity to spend meaningful time in nature and foster collaboration.

On 15 November, Company employees and their family members took part for the first time in a 21.5 km hike with the Samogitian Scout Organization (Mažeikiai-Juodeikiai route). A total of 39 participants took part, engaging not only in hiking but also in scouting activities. During the hike, a campfire was lit in the Leckava Song Valley. Participants had the opportunity to light a fire using traditional tools. The route continued past the Kuodžiai Hydropower Plant and Juodeikiai dam and concluded at the Company's permit office area. All participants received certificates, and appreciation gifts were presented to the scout leaders.



Workshops and fairs

In 2025, the Company, together with educators from various CSR areas, invited employees to participate in creative workshops. During these workshops, Advent wreaths and Easter decorations were created using sustainable materials. The Company also revived the tradition of organizing a handmade crafts fair, involving people with disabilities, children, and socially vulnerable families. The event attracted significant employee interest.

On 27 November, the Company hosted a Christmas fair featuring handmade products from social organizations. In addition to ORLEN Lietuva, five social organizations and charitable initiatives from the Mažeikiai and Klaipėda regions took part in the fair. Representatives presented handmade products, including jewelry, baked goods, and crafts for employees.

For the first time, products were presented by children supported by the Viekšniai Branch of the Order of Malta and representatives of social workshops for people with disabilities. Contributions were also made by the Klaipėda Social Services Center *Lakštutė* and children from the Children's Day Center of the Mažeikiai Social Services. This initiative enabled employees to purchase unique Christmas gifts while contributing to social well-being by supporting these organizations.



During the event, a charity initiative was also carried out – the women's biker club *Geležinės Šluotos* organized a support campaign for single mothers in the Mažeikiai region. Donations included food, hygiene products, children's goods, and essential supplies.

As part of the Christmas fair, traditional Advent wreath-making workshops were held, attracting record employee participation. Educators from *Vilties Erdvė* not only sold handmade products but also shared guidance on creating wreaths using natural materials such as cones, dried fruit, spices, and decorative elements. A total of 51 unique Advent wreaths were created.

A large ORLEN Lietuva team among thousands of runners in Mažeikiai

On 16 February 2025, marking the Day of the Restoration of the State of Lithuania, the ninth traditional run, 'Run for Freedom!', took place in Mažeikiai, bringing together more than 2,500 participants. During the event, the Lithuanian Athletics Federation 10 km Road Running Championship was also held, with nearly 300 runners taking part. A total of 28 ORLEN Lietuva employees actively joined the initiative. Participation in this event reflects the Company's commitment to promoting physical activity, civic engagement, and a sense of community.

Employees' family members also took part, with some participants running alongside their children, strengthening intergenerational connections and promoting healthy lifestyle values. The first 'Run for Freedom!' event was held in 2017 and attracted around 500 participants. The steadily growing number of participants demonstrates the long-term value and significance of this initiative for the local community. The event was organized by the Mažeikiai District Municipality and the association *Sporto Renginiai*, with financial support provided by ORLEN Lietuva, contributing to socially meaningful initiatives and the promotion of an active lifestyle in the region.



Lectures on burnout syndrome: 'Burnout: Caused by Others, Caused by Ourselves'.

In recent years, increased attention has been given to burnout syndrome. Due to its significant negative impact on work performance, personal life, the global economy, and public health, burnout was included in the International Classification of Diseases (ICD) in 2019, following an initiative by the World Health Organization.

In 2025, the Deputy Director of Communication – recipient of the ISM Award for Best Final Thesis of the Year on burnout prevention – presented the findings of her research to the ORLEN Lietuva community and local stakeholders. A total of 8 free *Expert Club* sessions were organized, focusing on recognizing burnout, its individual and organizational causes, and prevention measures. 4 sessions were held at ORLEN Lietuva sites in Mažeikiai, Būtingė, and Vilnius. 4 sessions were delivered to local communities. The lectures were organized at Mažeikiai Library, Merkėlis Račkauskas Gymnasium, Innovative Medicine Center in Vilnius, other educational institutions in the Mažeikiai region. In total, approximately 400 participants attended these sessions. Initiatives aimed at improving the emotional well-being of employees and community members are included in the Company's sustainability strategy. The initiative attracted strong employee engagement and interest.



LJA Job Shadowing Program

The Company actively contributes to the career development of young people by involving employees and participating in the LJA Job Shadowing Program. This initiative enables students to gain first-hand insight into various professions.

In November 2025, the Company participated in the program for the third consecutive year, offering students an opportunity to explore employees' daily activities, the working environment, and the Company's operations. A total of 22 students from grades 9 to 12 participated, representing schools from Kaunas, Klaipėda, Kaišiadorys, Šiauliai, Mažeikiai, Seda, and Židikai. The Company also contributed to introducing members of the Young Energy Club to the activities of the Energy Department.

The program involved several Company departments, including Strategy, Development and Technology Department, Energy Department, and Maintenance Department. Employees shared their professional experience, introduced students to their engineering work, discussed key challenges, and outlined the required competencies. Students also took part in a guided tour of the production site, gaining valuable insights into the Company's operations.

ORLENFest Summer Celebration: 'Powering the Future Today'

Every year, on the first weekend of August, ORLEN Lietuva brings its community together through the traditional summer event 'ORLENFest'. In 2025, the event was held for the 41st time at Renavas Manor, bringing together employees and their families for shared leisure activities. Participants formed teams comprising employees, their family members, and students completing internships at the refinery. During the event short films prepared by the teams were screened and participants competed in team-based activities. The program focused on active leisure, teamwork, and strengthening community spirit.

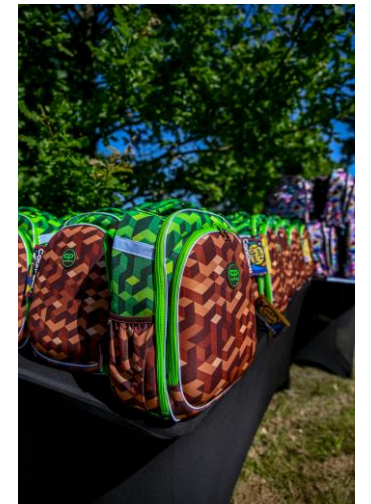
Traditional summer festival in 2025 was attended by nearly 5 thousand of the Company employees and their family members.



42 future first-graders received ergonomic school backpacks

On 14 August 2025, ORLEN Lietuva organized its traditional community initiative for future first-graders, an event that has been held for over 20 years. The event brought together around 100 participants, including 40 children starting primary school. This initiative is part of the Company's social responsibility and employee well-being policy, aimed at strengthening relationships with employees' families, fostering community spirit, and creating a supportive social environment in the region. During the event participants had the opportunity to interact informally and engage in shared activities. Children, together with their parents, took part in a guided tour of the production site of the Company. Afterwards, participants joined an educational program introducing children to basic scientific principles and real-world technological applications.

At the end of the event, future first-graders were presented with ergonomic school backpacks and pencil cases to support their preparation for the next stage of their education. ORLEN Lietuva considers this initiative an important way to strengthen community ties, and the Company's positive image. It contributes to long-term social value creation and sustainable development, while inspiring younger generations to pursue opportunities in science, technology, and industry.



ORLEN Lietuva - 45 years of experience

On 29 April 2025, the refinery marked its 45th anniversary – an important milestone not only for the Company but also for the entire Mažeikiai region. This anniversary marked an important milestone in the Company's long and meaningful journey and provided an opportunity to reflect on the present while bringing together employees and the Mažeikiai community.

A gift to the Mažeikiai Community

To present the Company as a socially responsible employer and introduce younger generations to the oil refining sector, a widely promoted initiative took place from 28 April to 3 May, offering free access to the exhibition 'Journey of Oil' at the Mažeikiai Museum. On the occasion of the refinery's anniversary, the exhibition was visited by children from kindergartens and schools, as well as representatives of institutions whose development had been supported by the refinery, along with various other organizations. The exhibition was designed to be accessible and engaging for visitors of all ages. To engage young people in sustainability initiatives, children and students were invited during 'Museum Week' to create greeting postcards for ORLEN Lietuva. More than 200 young participants took part, and their postcards were later presented to the Company managers as personalized gifts during the TOP100 conference. Younger visitors could follow the journey of a crude oil drop through pipelines, while older visitors could touch, smell, and guess products and materials derived from crude oil. The exhibition was also adapted for people with disabilities: Braille information panels were installed as well as access to exhibits and audiovisual content was ensured for visitors using wheelchairs.

The exhibition was presented as a gift from the Company to the city.

The initiative generated significant interest – more than 700 visitors attended the museum within a week, compared to the usual flow of approximately 100 visitors over the same period.

An invitation to revisit black-and-white history

On 29 April, the Mažeikiai Museum hosted two free evening film screenings for residents, visitors, and employees, dedicated to the history of the refinery's construction and the development of the city of Mažeikiai. Archival black-and-white films were screened, with the oldest dating back to 1973. The films were shown using authentic 1970s cinema equipment, operated by a licensed projectionist – also a Company employee working as an electrochemical protection engineer.

After the screenings, participants were invited to enjoy apple juice and 45 cakes and pastries, symbolizing the Company's 45 years of operation. The initiative brought people together for shared experiences, conversations, and the exchange of memories.



Invitation to the Photo Exhibition 'Life inside the Refinery'

The Company revived its tradition of organizing exhibitions. On the occasion of the anniversary, employees were invited to visit a specially prepared photo exhibition 'Life inside the Refinery'. The exhibition showcased both historical and contemporary moments from the Company's operations, employees' daily work, shared achievements, and the values that unite the organization.

For the first time in its history, ORLEN Lietuva opened its doors to people with hearing impairments

At the end of August, the refinery welcomed visitors from Šiauliai. More than 20 members of the Lithuanian Association of the Deaf visited the Company to learn about its activities, achievements, and social responsibility initiatives.

For the first time, the tour was conducted with the support of a sign language interpreter. Participants actively engaged in the presentation and asked the Company representatives numerous questions. The youngest visitor asked about employment opportunities at the refinery, prompting a discussion on the Company's readiness to include people with disabilities in the workforce and highlighting the importance of inclusion, accessibility, and equal opportunities.

A large ORLEN Lietuva team at the Mažeikiai City Festival



At the end of May, the festival 'Miestas vingyje Ventos' (City Along the Venta River) took place in Mažeikiai, offering a rich programme of events, activities, and concerts. The Company contributed to the event as a sponsor and participated in the festive parade. To enhance visibility, the Communication Group provided employees with Company-branded caps and T-shirts. More than 80 Company representatives took part in the parade, contributing to a unified and positive Company image.

Open Day 2025

On 15 October, the Company hosted its Open Day for business partners for the third time. The event brought together more than 130 companies and approximately 300 participants from 15 countries. The opportunity to establish connections and develop cooperation with ORLEN Lietuva attracted representatives of engineering companies and service providers from various sectors, both from Lithuania and abroad, including Latvia, Estonia, Finland, Sweden, Norway, Poland, Bulgaria, Italy, Romania, France, the Czech Republic, Germany, the United Kingdom, China, and the Netherlands.

The event targeted companies with experience in servicing the oil refining industry and supplying related equipment. Participants met with members of the Company's leadership, as well as experts from procurement, maintenance, investment, energy, logistics, technology, sustainability, occupational safety, and environmental protection. Guided tours of the production site were also organized, allowing participants to gain first-hand insights into refinery operations and see the Residue Hydrocracking Unit under construction.



Participation in career and partnership events

In 2025, ORLEN Lietuva actively participated in career and partnership events across Lithuania, aiming to strengthen ties with the academic community and attract future technical specialists. The main objectives were to present the Company as an attractive and stable employer; to help students better understand the labour market; to establish early connections with promising talent; to share professional experience; to introduce paid internship opportunities and career paths; and to increase interest in the industrial sector among young people. Representatives of the Company attended CTF Partner Days organized by KTU, KTU WANTED Career Days, 'Tapk WANTED vasara' events, VILNIUS TECH CAREER FEST, and job fairs organized by Šiauliai State College and Klaipėda University of Applied Sciences ('Tavo karjera: rinkis ir veik').



Occupational safety as a sign of organizational maturity: 'Safety Culture Ambassador 2025' award by the State Labour Inspectorate

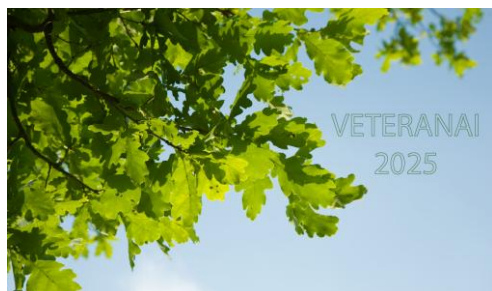
In 2025, ORLEN Lietuva received a special recognition award and diploma in Lithuania's first national best practice competition in occupational safety and health management 'SH360'.

The competition, organized by the State Labour Inspectorate, brought together 15 Lithuanian companies presenting their occupational safety solutions. ORLEN Lietuva was among the three companies receiving special recognition. The evaluation focused on occupational risk management, employee training, awareness-raising, strengthening a preventive safety culture, and cooperation between employers and employees. The Company was recognized for its active employee engagement and its efforts to strengthen accountability for workplace safety. The competition attracted considerable attention and reflects the growing importance of workplace safety as a core organizational value.



Source of photo: Occupational safety as a sign of organizational maturity: The Safety Culture Ambassador 2025 selected by the State Labour Inspectorate

People at the heart of ORLEN Lietuva: honoring long-serving employees



The success of ORLEN Lietuva is driven by its people - the Company's most valuable asset. The Company brings together more than 1,500 employees, ranging from young professionals to highly experienced specialists whose knowledge and dedication drive organizational growth.

On 6 June, employees celebrating 25 to 45 years of service were honored. Following the formal ceremony, oak trees were traditionally planted, symbolizing loyalty and shared growth with the Company. The evening program included the presentation of awards to long-serving employees, refreshments, and a concert. The event was marked by a celebratory atmosphere, highlighting a strong sense of community, respect for long-serving employees, and the Company's strong organizational culture.

'Newcomers' Day' - the start of a successful career path

The Company organizes 'Newcomers' Day' events on a quarterly basis for new employees and interns. During these events, participants are introduced to the Company's operating principles and key areas, helping them integrate more smoothly into the workplace. Participants gain an understanding of the Company's activities, build connections with colleagues, and acquire practical knowledge.

'Newcomers' Day' begins with an informal introduction, during which participants introduce themselves. Then, the Company's key business areas are presented, including human resources, communication, occupational safety, environmental protection and control, market operations, sales, and supply chain management. Relevant topics are also discussed, such as the prevention of workplace violence and harassment, as well as the protection of personal data.

The session is complemented by a guided tour of the refinery site. During the tour, participants are introduced to technological processes, as well as the activities of the Quality Assurance/Quality Control Center and the Waste Water Treatment Shop.



First aid training - an investment in safety and confidence



The Company consistently ensures that employees are prepared to provide first aid by organizing mandatory training sessions. Employees are certified every five years in accordance with applicable legislation, as defined by Order No. V-69 of the Minister of Health of the Republic of Lithuania, which regulates mandatory first aid training. Training is planned systematically based on certificate validity, and its quality is ensured through the extensive experience of the instructors. Participants are introduced to the latest first aid equipment and methods, with a strong emphasis on practical skills, including the use of defibrillators.

The knowledge gained is applied not only in the workplace – there have been real cases where employees successfully responded in critical situations and helped save lives. This strengthens self-confidence and fosters a strong safety culture within the organization. For this reason, the training is regarded not only as a mandatory requirement, but also as an important investment in employee competence and the Company's resilience.

Training by the Mobilization and Civil Resistance Department under the Ministry of National Defense

On 10 December, employees participated in training organized by the Mobilization and Civil Resistance Department under the Ministry of National Defense. Participants gained both theoretical and practical knowledge on how to act during emergencies or in the event of war, strengthened their psychological resilience, and learned about civic resistance measures.

Topics covered included:

- Preparedness for emergencies and wartime,
- The role of citizens in national defense,
- Resilience to hybrid threats (e.g. disinformation, propaganda).

On 17 October, employees were invited to a virtual event: 'BLITZ 2025: the Code of Courageous Leadership'

During this two-hour session, eight experts from GRAND PARTNERS shared insights on how to empower teams, transform resistance into a driver of change, and strengthen organizational resilience.

Training session: 'Understanding the VUCA World: How to Adapt and What Helps Reduce Its Impact in Personal and Organizational Life'

On 17 December 2025, employees participated in an *Expert Club* session titled: 'Understanding the VUCA World: How to Adapt and What Helps Reduce Its Impact in Personal and Organizational Life'. During the session, the Control Group Manager of the Control and Security Department provided a clear overview of the day-to-day work environment, the impact of employees' actions and inaction on organizational performance and beyond, as well as the principles and mechanisms of internal control.

Training sessions: 'Preparedness to Act in the Event of a War Threat: Do We Really Know What to Do?' and 'Civic Resistance Strategies'

On 26 May 2025, training sessions were organized on: 'Preparedness to Act in the Event of a War Threat: Do We Really Know What to Do?' and 'Civic Resistance Strategies'. The training was delivered by a reserve major with 20 years of service in the Lithuanian Armed Forces. During the sessions, participants were introduced to key principles of personal and family preparedness, actions to take in the event of evacuation, essential emergency supplies, and appropriate behavior in crisis or wartime situations.

Lecture: 'Motivation: Motivating Yourself and Others'

On 9 June, employees were invited to a remote lecture: 'Motivation: Motivating Yourself and Others'. The session was delivered by a doctor of medical sciences, lecturer, supervisor, neurologist and psychotherapist, President of the Lithuanian Association of Cognitive Behavioral Therapy and President of the Lithuanian Association of Mindfulness-Based Psychology, with over 20 years of experience in applied psychology, psychotherapy, and human potential development.

Training on workplace psychological well-being

On 30 October, employees were invited to a three-hour training session: 'Improving the Psychological Climate at Work: a New Approach to Work Organization'. The session covered topics such as effective work practices, fostering a positive psychological environment, mutual understanding among employees, and emotional intelligence.

Safety and Health Week

From 26 to 30 May 2025, the Company held its ninth annual Safety and Health Week, aimed at strengthening safe working practices and fostering an even stronger safety culture. The program included a range of activities encouraging active employee participation:

- 'Report a Hazard' initiative - employees were encouraged throughout the week to report unsafe conditions. The most active participants received prizes.
- Lectures and training sessions, including: 'Preparedness to Act in the Event of a War Threat: Do We Really Know What to Do?' and 'Civic Resistance Strategies'.
- Rapid blood glucose testing conducted by UAB Medikvita, with the service used by 37 employees.
- Knowledge contest 'Test Your Knowledge and Win!' - a 12-question OSH test published on the intranet; 35 employees participated, and the top three performers received prizes.
- PPE innovations - an interactive presentation of work footwear, as well as mechanical and chemical hand protection solutions. Participants were introduced to PPE manufacturing technologies, materials and components, along with key standards, labeling requirements, and factors influencing employee comfort. Practical PPE selection session - guidance on how to assess and choose appropriate protective equipment.

- Lecture and exercise session: 'Get the Day Moving! Effective Movement for Better Well-being' - organized by the Public Health Bureau. The session included an introduction to the importance and benefits of physical activity, followed by a guided exercise session delivered by a public health specialist.
- Body composition analysis - Public Health Bureau specialists helped employees assess their body composition, including BMI, body fat, muscle mass, bone mass, metabolic age, and other indicators. 51 employees participated.
- Elevator lift experience - participants had the opportunity to ascend to a height of 54 meters and enjoy a view of the Company's site from above.
- 'Emergency preparedness: Do you know where to take shelter in the event of an air raid at the refinery?' - employees were invited to visit the Company's Shelter No. 1.





ORLEN Lietuva metų iššūkis!

Visus ORLEN Lietuva darbuotojus kviečiame prisijungti į ORLEN Lietuva darbuotojų 2025 m. žingsnių iššūkį! 🏃‍♂️

🏆 VISI DALYVIAI TURI GALIMYBĘ LAIMĖTI PRIZUS KIEKVIENĄ MĖNESĮ! PRIZŲ FONDĖ PER 600 PRIZŲ!

- Pasibaigus mėnesiui, apdovanosime aktyviausią mėnesio dalyvį ir kiekvieną praėjusį mėnesį burtų keliu iš kiekvienos kategorijos apdovanosime po **2 laimėtojus**:
 - Dalyviai, kurie per mėnesį nužingsniavo iki 150 000 žingsnių - **PRADEDANTIEJI**;
 - Dalyviai, kurie per mėnesį nužingsniavo 151 000 - 300 000 žingsnių - **PAŽENGUSIEJI**;
 - Dalyviai, kurie per mėnesį nužingsniavo daugiau negu 301 000 žingsnių - **PROFESIONALAI**.
- Žingsnių piniginėje iššūkio eigoje rasite prizų su įvairiomis simbolinėmis dovanėlėmis.
- 2025 m. pabaigoje apdovanosime 5 aktyviausius dalyvius.

Organizatoriai ORLEN Lietuva turi teisę patikrinti iššūkio dalyvio žingsnių skaičiavimo įrangą.

Reikia pagalbos? Skambinkite +370 699 79877 arba rašykite support@walk15.app

#walk15



Žingsnių sertifikatas

ORLEN Lietuva

Iššūkio rezultatai

984 839 133 Žingsnių	7234 Žingsnių vidurkis	87 Aktyvumo minutės
3 517 283 Virtualūs medžiai	126 521 kg Sutaupyto CO2	

2025



Tvaraus verslo lygos 2025 žingsnių iššūkio ataskaita

ORLEN Lietuva

2025 RUGSĖJIS-SPALIS

31 diena Iššūkio trukmė	150 Dalyviai
46 830 217 Iveikta žingsnių	312 201 Vidutinis dalyvio žingsnių kiekis
33 450 km Iveiktas atstumas	0.94 kartų Aplink Žemę
6.02 t CO2 sutaupyta vaikščiojant	

Dėkojame, kad rodote pavyzdį taikydami aukštus tvarumo ir sveikesnio gyvenimo standartus.

Walk15 komanda

Sustainable Business League

Employees were invited to join the 'Sustainable Business League 2025', an international challenge held as part of European Mobility Week. The challenge started on 16 September and continued throughout the month.

Walk15 Step challenge

To promote employees' physical activity, the Company organized the 'Walk15' step challenge program throughout 2025. The challenge began on 1 January and continued for the entire year. Each month, the most active participants were recognized, along with six additional prize winners selected by draw. Participants could redeem their accumulated steps for various prizes related to the Company's branded merchandise. The annual goal was to collectively circle the Earth 24 times, reaching a total of 1,220,000 steps. The goal was successfully achieved.

'Safe Steps in the ORLEN Group' challenge

Employees were also invited to take part in the 'Safe Steps in the ORLEN Group' challenge starting from 1 September and to collect steps together with other participants across the ORLEN Group. An ORLEN Lietuva employee achieved an honorable second place and was awarded on 4 November at the ORLEN Group conference on process safety, personal safety, and fire prevention.



Occupational Safety, Process Safety and Fire Safety Conference

On 25–26 March, the annual ORLEN Group conference on occupational safety, process safety, and fire safety was held in Płock, Poland, with participation of Company representatives, including the Director of Quality, Labor Safety and Environmental Control, Occupational Safety and Health Manager, and the Process Safety Manager.

The conference reviewed 2024 results and discussed planned measures to improve occupational safety, process safety, and fire safety in the coming year. Awards were also presented for implemented organizational and technical best practices. The Company received a second-place award and prize for an organizational best practice – specifically, for organizing step challenges.



Other events

Employees interested in art and culture were given the opportunity to attend events of the International Arts Festival held in Mažeikiai in autumn 2025 free of charge. Basketball fans were also invited to attend matches of the Mažeikiai basketball club *M Basket*.

On 26–27 September, Mažeikiai hosted ORLEN Lietuva Rally Cup 2025, an event sponsored by the Company. Fans of the sport could safely watch live broadcasts from the speed stages, whereas some employees even took part in extreme driving training after the rally.

Meeting with Stokker representatives

On 3 April 2025, representatives of Stokker visited ORLEN Lietuva to present an award to one of the process unit operators, an active employee representative for safety and health. The award was earned at an occupational safety and health conference held in Vilnius. The prize consisted of a first aid eye wash and soft plaster station, which the employee, together with his supervisor, installed at their workplace. During the visit, representatives of Stokker also presented the Company with a range of OHS products.

ORLEN Lietuva sports games

In 2025, the ORLEN Lietuva sports games were relaunched. From 16 to 20 September, employees were invited to take part and try their hand at various sports activities.



Recognition and awards

ORLEN Lietuva among the largest contributors to the state budget

In May 2025, on Taxpayers' Appreciation Day, ORLEN Lietuva was recognized as one of the three largest contributors to Lithuania's state budget. The Company's total tax contribution amounted to EUR 522.9 million. During a formal ceremony at Vilnius Town Hall, the Lithuanian Free Market Institute presented awards in nine categories, recognizing the most transparent taxpayers, largest contributors, and export leaders. ORLEN Lietuva was also distinguished for its contribution to the country's exports, being named the largest exporter.



During the event, it was emphasized that paying taxes is not only a legal obligation, but also an important contribution to public welfare, ensuring funding for healthcare, education, public transport, infrastructure, and other essential services. As one of the largest taxpayers in Lithuania, the Company recognizes its responsibility not only to operate in compliance with legal and ethical business standards, but also to contribute to national development. This aligns with the Group's long-term strategic direction - ORLEN Group plans to invest approximately EUR 84-91 billion by 2035, with a strong focus on green energy and strategic infrastructure.

Corporate governance





Business conduct

Company management structure

ORLEN Lietuva operates in accordance with its Articles of Association, registered in the Register of Legal Entities on 12 September 2025 (further information is available [here](#)), as well as the Civil Code of the Republic of Lithuania, applicable laws, and other legal regulations. The primary purpose of the Company is to ensure the efficient and effective operation of the oil refinery, oil terminal, oil and petroleum product pipelines, Combined Heat Power Plant as well as other facilities that are operated by the Company, to rationally use assets of the Company, to produce and supply products and render services to its customers, as well as to carry out any other activities with the aim of enhancing the Company's and its shareholders' interests, including the implementation of the mission and strategy of ORLEN Group.

The Management Board is a collegial governing body of the Company, while the General Director serves as the sole executive body. The General Director and the Management Board are responsible for the overall management of the Company. They operate in accordance with standard business practices, oversee the Company's general economic activities, and ensure the development of its business.

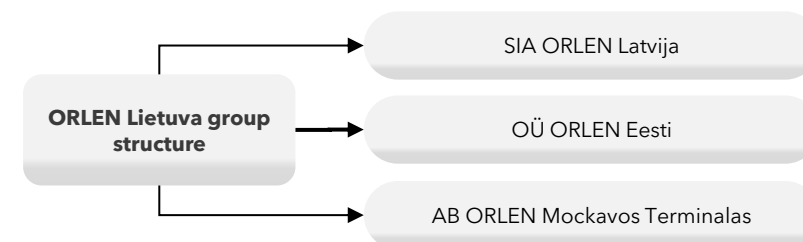
As of 31 December 2025, the Company's Management Board comprised the Chair of the Board, the General Director, Dariusz Zonenberg, and the following Board members:

- Eglė Treinienė - Executive Member of the Board, Chief Financial Officer of ORLEN Lietuva,
- Artur Krzysztof Śladowski - Executive Member of the Board, Deputy General Director for Commercial Sales and Logistics of ORLEN Lietuva,
- Arkadiusz Marian Falecki - Non-executive Member of the Board of ORLEN Lietuva,
- Renata Agnieszka Rosiak - Non-executive Member of the Board of ORLEN Lietuva.

- Andrzej Mieczysław Stegenta - Non-executive Member of the Board of ORLEN Lietuva,
- Marek Wocial - Non-executive Member of the Board of ORLEN Lietuva.

Other positions held by members of the Management Board are presented in the **Management Report of AB ORLEN Lietuva for the year 2025**.

In the financial year 2025, ORLEN Lietuva Group had three subsidiaries.



Governance bodies of subsidiaries

SIA ORLEN Latvija:

- General Meeting of Shareholders
- Supervisory Board
- Board of Directors

OÜ ORLEN Eesti:

- Shareholders' Meeting
- Board of Directors
- Supervisory Board

AB ORLEN Mockavos Terminalas:

- General Meeting of Shareholders
- Board of Directors
- Company Manager (Director)

Company Management - 2025 financial year

(as of 31 December 2025)



Dariusz Zonenberg

General Director, Chairman of the Management Board



Eglė Treinienė

Chief Financial Officer,
Member of the Board



Artur Sladowski

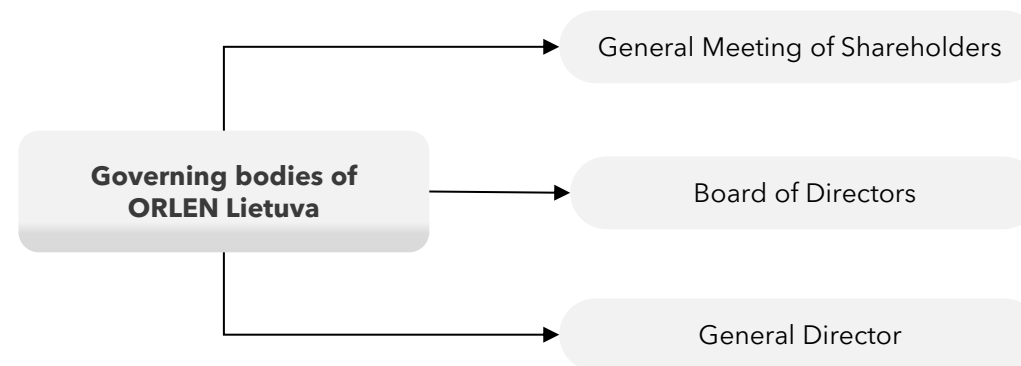
Deputy General Director for
Commercial Sales and
Logistics, Member of the Board



Audrius Daugnora

Deputy General Director
for Operations

ORLEN Lietuva is registered in the Register of Legal Entities of the Republic of Lithuania (company code 166451720). The Company is a non-associated member representing large enterprises and corporations in the Confederation of Lithuanian Industrialists, which is registered in the European Union Transparency Register (registration No. 528097249686-34).



In its operations, the Company adheres to the highest standards of business ethics and principles of social responsibility. To clearly define these principles and communicate its position on key ethical issues, including human rights protection and the prevention of bullying, discrimination, harassment, and all forms of violence, the Company has implemented a range of measures, procedures, and internal documents. The primary document governing adherence to these standards is the Code of Ethics, which provides practical guidelines defining the ethical expectations applicable to all employees.

The Company strives to become one of the most modern and efficient oil refineries. To achieve this, it follows the highest principles of transparency, accountability, and professional ethics in all its operations. The Company duly pays all taxes required by law and prepares its financial statements in a transparent manner. Further information on the ORLEN Group's core values and standards of conduct is available [here](#) and on its financial statements is available [here](#).

In addition to the Code of Ethics, the Company applies a **Supplier Code of Conduct**, which is a key element of cooperation with suppliers and governs supplier selection and evaluation processes. The Company collaborates with suppliers who are committed to continuous improvement, meet evolving market expectations, and adhere to responsible business principles. It is important for the Company that its partners invest in human capital and business development and adopt a strategic, long-term approach. Particular emphasis is placed on ethics and professionalism rooted in tolerance and mutual respect, as well as on maintaining a high level of competence supported by employees' knowledge, skills, and experience. The Company also seeks to work with suppliers who are open to innovation and non-standard solutions. Supplier reliability is considered a key factor in reducing the risk of disruptions across the supply chain. More information is available [here](#).

Ethics, values, and respect for human rights - core elements of organizational culture and Company strategy

0 cases

In 2025, as in 2024, **there were no** publicly reported cases of corruption or bribery involving the Company or its employees.

EUR 36,000

Allocated to lobbying activities.

EUR 0 in 2024.

EUR 0

Allocated to support political parties.

Also EUR 0 in 2024.

As a responsible, transparent, and reliable business entity and partner, the Company maintains a zero-tolerance approach to all forms of corruption and fraud.



Key policies and procedures

As a responsible and transparent company, ORLEN Lietuva applies a zero-tolerance policy to corruption and fraud. The Company also follows ORLEN Group **Anti-Corruption Policy**, based on which internal **Corruption and Fraud Prevention Rules** have been developed. These Rules apply to all employees, regardless of their role or form of employment, as well as all stakeholders, particularly those acting on behalf of the Company. The rules define standard principles and requirements aimed at preventing all forms of corruption, fraud, and abuse. The Control and Security Department implements anti-corruption and anti-fraud measures and cooperates with law enforcement authorities; ensures the Company’s protection against corruption and fraud risks; assesses compliance of employees, Company representatives, and business partners with applicable laws and internal regulations; defines prohibited conduct; establishes obligations for employees and external parties; implements internal control mechanisms within business processes; oversees training and reporting; and ensures that mandatory provisions are included in contracts with external parties. All employees are required to undergo anti-corruption and anti-fraud training every two years. In cases of suspected corruption or fraud, investigations are conducted in accordance with the Company’s Regulations on Carrying out Controls.

Individuals exposed to the highest risk of corruption

637

635 in 2024

Employees in high-risk positions who participated in training programs

637

635 in 2024

The Company has implemented **Rules on Anonymous Reporting of Irregularities** and operates an whistleblowing system. The rules are based on the Law of the Republic of Lithuania on the Protection of Whistleblowers and ORLEN Group principles governing whistleblower protection.

The purpose of the Rules is to encourage and enable employees of the Company to report, in good faith, the attempted corrupt practices, suspected or actual corruption as well as infringements or weaknesses of the system for management of anti-corruption activities. The Company’s Anti-Corruption Coordinator consults whistleblowers and provides information on how to act in case of any suspicions or a situation which might involve the corrupt practices.

Irregularities to be reported:

- **Employee deceit,**
 - **Abuse of authority,**
 - **Mobbing;**
 - **Harassment,**
 - **Stalking;**
 - **Discrimination;**
 - **Threats to personal safety and/or property.**
- Violations can be reported through multiple channels (handled by a responsible employee of the Control and Security Department):
- By post (addressed to the Director of Control and Security),
 - By email: anonim@orlenlietuva.lt or by phone (anonymously),
 - In person by contacting a representative of the Control and Security Department,
 - Reports may be submitted via designated mailboxes located near the main administrative building, at the entrance to the industrial site, and at the administrative buildings of key process units. Anonymity is ensured, as these mailboxes are not covered by video surveillance.

Business partner due diligence rules. Under these rules, ORLEN Lietuva applies a due diligence process for business partners (counterparties), including initial (formal) verification, legal review, financial assessment, sanctions screening, and security checks.

The Company has implemented **Regulations on Giving and Accepting Gifts**. The regulations define categories of gifts, specify which gifts may be accepted or given without approval, identify prohibited gifts, and regulate permitted gifts. A non-monetary gifts register is maintained in accordance with these regulations. The regulations also cover employee training on compliance with the gift policy. Individuals representing the Company, as outlined in contracts with the Company, must familiarize themselves with the latest version of the regulations and the relevant training materials available on the Company’s website.

The Company has established **Conflict of Interest Management Rules**, which define employees’ duties that may give rise to conflicts of interest. Employees holding positions specified in the Rules are required to sign an Independence Declaration. The Rules set out types of relationships that may create conflicts of interest, procedures for managing potential conflicts of interest, procedures for managing actual conflicts of interest, actions to be taken when an undisclosed conflict of interest is identified, as well as training and reporting requirements.

Mandatory contractual provisions. These provisions apply to all agreements concluded between ORLEN Lietuva and third parties. They define international restrictive measures and sanctions, anti-corruption requirements, and obligations related to changes in the financial standing of business partners.

As the Company is included in the list of enterprises and facilities of strategic importance to national security, as well as other entities essential for ensuring national security, it applies **Pass System Regulations** that govern entry to and exit from Company premises, as well as conduct while on-site, and establish control procedures involving the verification of identification cards, permits and/or other documents confirming identity or other required information for employees and other persons, as well as personal belongings, goods transported in vehicles and related documentation, along with procedures governing the entry, removal and transfer of material assets within Company premises or between separate Company sites, and the dispatch of empty tank trucks and rail tank cars from the Company's refinery.

Risk management in the Company

The Company operates a centralized risk management system, defined in the Risk Management Policy and applicable rules. These documents establish the key principles of risk management and the specific actions for their implementation. The ORLEN Group's IT system, Magique Galileo, is used for risk management, where significant Company risks are identified, recorded, and assessed.

The risk management process covers all areas of the Company's operations, including the processes of the Integrated Management System. The system ensures consistent identification and assessment of risks, application of risk control measures and monitoring of their effectiveness. This is carried out in accordance with a unified ORLEN Group risk management model. Risk assessment also includes the evaluation of significant control measures, particularly those related to financial and operational reporting.

Risk management is integrated into day-to-day operations, with responsibility assigned to process and risk owners, as well as top management, who ensure the effective functioning of the risk management system and the proper application of policies in line with best practices.

In 2025, a risk assessment covering the previous 12-month period was carried out in accordance with established timelines. The assessment involved employees from various organizational units and was coordinated by designated specialists, who ensured adherence to the methodology and provided guidance to risk and control owners. The assessment was conducted using the Magique Galileo system, through which the Company's processes were analyzed, significant risks were identified, and the effectiveness of control measures was evaluated. The assessment confirmed that all identified risks are managed through effective control measures. The results of the risk assessment were presented to the Company's top management and the Management Board.

Following the annual assessment, the Company applies a principle of continuous risk review. Each quarter, control owners assess the effectiveness and relevance of control measures and update the system as necessary. This approach enables a timely response to changes and ensures appropriate preparation for the next assessment cycle. Process owners determine which risks require a formal risk management approach and which can be managed through alternative measures, such as compliance or operational risk management, ensuring that decisions are based on reliable and comprehensive information.

Integrated Management System Policy

With the aim of becoming one of the leading oil refining companies in Central and Eastern Europe, the Company focuses on high-quality production, transparent and responsible operations, and the application of advanced management practices. The Company's activities are based on the principles of social responsibility, ensuring the security of information and personal data, while placing particular emphasis on environmental protection, occupational safety and health, and the quality of petroleum product and environmental testing.

At all levels of its operations, the Company adheres to its declared values and operates in accordance with an Integrated Management System (IMS) that complies with international standards: Quality Management (ISO 9001:2015), Environmental Management (ISO 14001:2015), Occupational Health and Safety Management (ISO 45001:2018), Information Security Management (ISO/IEC 27001:2022), and General requirements for the competence of testing and calibration laboratories (ISO/IEC 17025:2018). The Integrated Management System Policy is regularly reviewed and improved in cooperation with ORLEN S.A. and other ORLEN Group companies. It is publicly disclosed and available to all stakeholders. Employees and other persons working on behalf of the Company are familiarized with the policy provisions and are required to comply with them in their activities. Further information is available [here](#).

The IMS in the Company is based on a process approach and covers production of petroleum products, including liquefied petroleum gas, gasoline, diesel, JET-A1 fuel, heavy fuel oil, bitumen, and sulphur, as well as wholesale trade, logistics, storage, and administrative activities. It also includes quality assurance of feedstocks and products, environmental protection, occupational safety and health, and information security management.

The key elements of IMS include the definition of policies and objectives, management of processes, risks, documents, and records, compliance with legal requirements, employee training, analysis of stakeholder expectations, internal audits, management review, and continuous improvement of the management system.

The Company sets specific, measurable, and achievable objectives aligned with its strategy. These objectives are regularly reviewed and updated to ensure continuous improvement and long-term sustainability. All Company processes are clearly defined and documented, while document management is carried out in accordance with established procedures, ensuring access to up-to-date versions. The Company uses an electronic document management system (*DOC-system*), ensuring transparency and accessibility of information. Significant attention is dedicated to the development of employee competencies and continuous learning, encouraging their involvement in process improvement.

The Company identifies and analyses stakeholders that influence or are affected by its activities, including shareholders, employees, customers, suppliers and contractors, regulatory authorities, and local communities. Customer feedback is systematically evaluated and used to improve operations.

In 2025, the Company updated its Context Analysis and, using an impact and interest matrix, assessed stakeholder needs. The following were also reviewed and updated: the Integrated Management System Description, IMS Internal Audit Rules, and SWOT analysis. In response to internal and external factors, the PESTEL analysis was updated, covering political, economic, social, technological, environmental, and legal aspects.



The Company maintains a register of legal requirements, which is continuously updated in cooperation with responsible organizational units, ensuring compliance with applicable legislation. Regular internal audits are conducted to assess the Integrated Management System's compliance with international standards and evaluate its effectiveness.

Overview of the QA/QC Center management

On 10 April 2025, documentation was submitted to the National Accreditation Bureau for the extension of the accreditation scope of the Quality Assurance / Quality Control (QA/QC) Center. On 18-20 August, a visit by the National Accreditation Bureau took place, marking the 53rd assessment of the accreditation scope. The purpose of the visit was to re-accredit the QA/QC Center's activities in accordance with the international standard LST EN ISO/IEC 17025:2018 'General requirements for the competence of testing and calibration laboratories' and to extend the accreditation scope. The audit was successful - the accreditation scope was expanded to include three new methods, directly reflecting the Company's strategic priorities of sustainability and employee health:

- Two new petroleum product testing methods, aligned with the Company's sustainability policy, replaced previously used methods involving environmentally and health-hazardous reagents, such as cobalt chloride silica gel and aniline. These reagents were fully eliminated, reducing environmental impact and ensuring safer working conditions for laboratory staff. The previous methods were removed from the accreditation scope.
- One new environmental testing method - sampling and determination of aromatic hydrocarbons in workplace air - was introduced. The accreditation of this method strengthens the Company's ability to carry out precise and reliable monitoring of workplace risk factors, contributing to employee health protection.

At present, the QA/QC Center is accredited to perform 112 testing and sampling methods, including: 62 methods in petroleum product testing and 50 methods in environmental and physical factor analysis. During the reporting period, approximately 300 operational documents were reviewed and prepared.

No non-conformities or recommendations for improvement were identified during the audit, representing the highest possible evaluation and confirming the excellent performance of the QA/QC team and the maturity of the implemented management systems.

The QA/QC Center has implemented and continuously improves a Process Information Management System, as well as the maintenance and service database *Alloy Navigator*. New testing methods have been introduced and applied in response to the Company's investment projects and technological developments, including: Bottom of the Barrel (BoB), Sustainable Aviation Fuel (SAF), Bitumen 555 projects. More than EUR 300,000 has been invested in new laboratory equipment. Quality system documentation is continuously updated.

All objectives set for 2025, as approved by the Director of Quality, Labor Safety and Environmental Control, were successfully achieved.

Results of internal audits

In accordance with the internal audit schedule, 22 audits were carried out in 2025, including 2 audits within the QA/QC Center. No non-conformities were identified; only six recommendations were provided to improve the management system and operations. Three non-conformities related to equipment failures were identified. Corrective actions and corrections have been defined and their implementation is currently in progress.

Other inspections

In addition to the external assessments described earlier in the report, inspections were carried out by AB VIAMATIKA (internal quality supervision of road bitumen production under LST EN 12591:2009) and the Drug, Tobacco and Alcohol Control Department (scheduled inspection related to handling of narcotic and psychotropic substances). No non-conformities were identified.



Other information

Compared to 2024, the volume of laboratory testing increased by approximately 8.6%, driven by higher bitumen sales and an increase in unplanned and additional testing related to the new IPPC permit.

Resource consumption also increased - the purchase of certified reference materials doubled, particularly for testing BoB equipment. The consumption of reagents and consumables increased in line with testing volumes.

A total of 6 new laboratory equipment units were acquired, bringing the total number of maintained equipment units to 741 in 2025.

Risk identification results

Risks at the QA/QC Center are assessed on an ongoing basis. Risk Assessment and Management Plan is updated multiple times throughout the year as needed (in case of non-conformity, new factors or changes). During the review, each identified risk is reassessed and, where necessary, the plan is updated.

With the aim of continuously improving the quality management system, further actions for the development of the IMS have been defined. These efforts include the updating of the Company's process map in order to improve its clarity and practical usability, as well as the systematic implementation of a non-conformity monitoring process, ensuring that identified non-conformities are consistently assessed according to their nature and that appropriate actions, such as corrections, root cause analysis, and corrective measures, are clearly defined. In addition, these efforts cover the strengthening of IMS auditor competencies through training delivered by external experts, as well as the enhancement of internal communication by increasing information sharing on process performance and achievements. They also include ensuring the evaluation of IMS process performance through periodic analysis of operational results and the achievement of objectives, along with reporting to the top management. Furthermore, these activities encompass the strengthening of the IMS internal audit programme by monitoring audit execution and continuously assessing the relevance of audit objectives and criteria, ensuring that each audit is appropriately aligned with process goals. Based on external and internal audit reports, no non-conformities were identified – only observations and opportunities for improvement were recorded. The Integrated Management System is considered appropriate, effective, and compliant with the requirements of the integrated standards.

Information security management



As the Company is certified under ISO 27001:2022, the following policies and rules are applied: Trade Secret and other Confidential Information Protection Policy, Information Management Regulations, Regulations for Use of Hardware and Software, Rules for Managing Keys and Locking Buildings and Premises, and Regulations of Processing of Company Secret. These are further summarized.

The Company's Trade Secrets and other Confidential Information Protection Policy aims to ensure the protection of trade secrets by defining the measures and actions required to maintain confidentiality. Each employee is obliged to protect trade secrets, including Company secrets, regardless of the form of its processing and the manner, way or source of access to such secret. The policy defines categories of information, including restricted-use, internal-use and secret information.

The Company has established **Regulations for Use of Hardware and Software**, which define standardized procedures and requirements to ensure the proper use of IT assets and the integrity, availability, and confidentiality of processed information. These rules apply to all employees, as well as to contractors and subcontractors who, under contractual arrangements, perform activities within the Company and use its information systems and equipment.

The Company has also implemented **Information Management Regulations**, which define the actions and requirements necessary to ensure the integrity, availability, and confidentiality of confidential, restricted-use, and internal-use information processed, stored, transmitted, or otherwise handled by the Company. These rules apply to all employees and third parties who provide services, perform work, and/or supply goods under contracts with the Company, including cases where information is exchanged within the ORLEN Group. Each newly hired employee is required, prior to commencing their duties, to sign a commitment to properly handle the Company's confidential information.

The Company also applies **Regulations of Processing of Company Secret**, which aim to ensure the secure management of secrets of both the Company and other ORLEN Group entities, in accordance with ORLEN Group principles for the protection of confidential information, applicable legal requirements of the Republic of Lithuania, and the Information Security Management System standard LST ISO/IEC 27001. The Company organizes and delivers information security training. Employees and other authorized individuals included in the list of persons entitled to handle Company secrets are required to complete such training.

Rules for Managing Keys and Locking Buildings and Premises set out procedures for securing Company buildings and facilities and managing keys. Their purpose is to reduce information security and physical security risks arising from unauthorized access to Company buildings and premises. The requirements are established in view of the pass system implemented in the Company's territory under protection with the limited access thereto restricted by security control posts, perimeter security fencing, electronic perimeter and access control system as well as video surveillance of the territory.

Information security management assessment

Following the annual information security (IS) risk assessment, several security measures were identified for implementation in 2025. These measures have either been implemented or appropriate decisions have been made regarding their future implementation.

Monitoring and measurement results

In December 2025, an evaluation of the effectiveness of information security controls confirmed that these measures are functioning effectively. No information security incidents were recorded within the Company. Additionally, no reports were received during testing indicating that the information security management controls failed to meet security requirements. Documentation and procedures of the Information Security Management System are regularly updated, sufficient resources are ensured, and preventive and corrective actions are carried out in accordance with established plans.

No non-conformities, recommendations, or improvement opportunities were identified during internal and external audits. During the ISO/IEC 27001:2022 certification audit (December 2025), only a few opportunities for improvement were identified for the IT Department. At present, no changes are anticipated that could have a significant impact on the Information Security Management System; however, any potential changes would be assessed without delay. No complaints related to information security were received in 2025.

The Company is actively preparing to comply with the requirements of the NIS2 Directive, strengthening its resilience to cyber threats.

Cybersecurity

Data security is of paramount importance to the Company; therefore, various measures are implemented to ensure and promote cybersecurity. One of these measures is the application of the Regulation of Processing of Company Secret described above. Additional safeguards are also applied, including: promoting employee awareness and vigilance when handling incoming emails, regularly updating software, using strong passwords and two-factor authentication, encouraging the use of antivirus software and its regular updates, creating backups of critical data.

Employees are encouraged to report suspicious emails immediately by clicking the 'Report SPAM' icon in Outlook or forwarding the original email as an attachment to: spam@orlenlietuva.lt.

Secure ORLEN

To increase awareness of potential threats, develop appropriate response capabilities, and strengthen the Company's safety culture, the 'Secure ORLEN' initiative has been launched across the ORLEN Group. Its objective is to address potential risks with a strong focus on employee awareness and the development of a robust security culture. The initiative aims to build both knowledge and practical skills necessary for effective response to potential threats, particularly in the area of physical protection of Group infrastructure.

As part of the initiative, various activities will be organized, both in-person and remotely:

- Training sessions and workshops, providing practical skills, including self-defense and casualty care during tactical situations (e.g. in the event of an attack or active assailant),
- Expert webinars, covering psychosocial threats such as social engineering and methods of identifying and preventing them,
- Educational competitions, focusing on incident response and appropriate behavior in emergency situations.

Additionally, the parent Company's Control and Security Department develops educational materials, including training videos, brochures, and leaflets presenting relevant procedures and schemes to reinforce acquired knowledge and practical skills.

Payment practices

Supplier relationship management is based on standardized ORLEN Group procurement procedures, including: ORLEN Group Supplier Code of Conduct (implemented by order of the Company's General Director) and Procurement Regulations. When concluding contracts, suppliers cooperating with the Company are required to comply with the values, ethical standards, and legal requirements defined in the Supplier Code of Conduct.

Suppliers wishing to participate in procurement processes must accept the Supplier Code of Conduct via the CONNECT procurement platform. This document outlines the ORLEN Group's values and expectations for suppliers, structured into three main categories. The Code includes criteria covering key environmental, social, and governance (ESG) aspects used in supplier assessment. Additional requirements may be defined during procurement processes (e.g. formal or technical criteria), such as the requirement to hold ISO, ISCC, or other certifications. During procurement processes (where applicable), potential suppliers may be requested to provide certificates, proof of origin of goods (including materials used in production) and proof of sustainability (PoS), for example, based on the ISCC EU certification system.

Further details can be found in the section [Value Chain Employees](#).

No specific policies are applied for the prevention of late payments to small and medium-sized enterprises. All suppliers are paid in accordance with the terms established in contracts. Internal Contract Administration Rules ensure timely payments, while payment terms are defined in agreements concluded between the parties.

In accordance with the Procurement Regulations, and to protect the Company's interests, the use of approved standard contract templates (general and special terms and conditions) is recommended for all procurement processes. When comparing supplier offers with different payment terms, the time value of money is also taken into account.

Table 38 provides information on the Company's supplier payment practices. The total number of invoices paid in 2025 amounted to **11,100**.

Table 38. Summary of invoice volumes and payment timelines

Time required to settle invoices (days)*	Number of invoices	Time required to settle invoices (days)*	Number of invoices
120	72	21	12
100	1	20	29
91	28	15	149
90	4,322	14	142
75	67	10	501
60	1,193	9	1
50	6	8	5
45	739	7	53
40	4	5	72
35	25	3	30
30	3,372	1	265
25	8	0	4

The main spending categories (Pareto principle – 80% of total expenditure) are as follows:

- Investments (25% of total expenditure; the majority paid within 30 days),
- Logistics (24% of total expenditure; the majority paid within 10 days),
- Feedstocks, reagents, catalysts, and additives (32% of total expenditure; the majority paid within 30 days),
- Energy resources, energy, and fuel (10% of total expenditure; the majority paid within 30 days).

Average payment terms by category:

- Investments – 62
- Logistics – 22
- Feedstocks, reagents, catalysts, and additives – 62
- Energy resources, energy, and fuel – 14

Given that the standard payment term is 90 calendar days from the invoice issue date, payments made under this term account for approximately 40% of the total volume of invoices received and payments executed. The remaining payments are primarily subject to shorter payment terms, including advance payments.

In 2025, as in 2024, there were no legal proceedings related to late payments.



Powering the Future.
Sustainably.



Sustainability Report

for the 2025 financial year



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