

## **AB ORLEN LIETUVA**

APPROVED BY:  
Director of Human Resources  
3 June 2026  
Order No TV1(1.2-1)-2026- 0245

### **REGULATIONS ON PREVENTION OF MOBBING, DISCRIMINATION, HARASSMENT AND VIOLENCE**

#### **CHAPTER I GENERAL**

1. The purpose of Regulations on Prevention of Mobbing, Discrimination, Harassment, and Violence (hereinafter, the Regulations) is to define methods for identifying unacceptable behavior at AB ORLEN Lietuva (hereinafter, the Company, the employer), possible forms of such behavior, as well as procedure for submitting and examining complaints on behavior exhibiting signs of mobbing, discrimination, harassment or violence towards an employee (hereinafter, the Complaint). These Regulations apply in conjunction with the Company's Code of Ethics, Human Rights Protection Policy and other internal documents regulating employee conduct and work culture. The Regulations shall apply in cases when the Republic of Lithuania Law on Protection of Whistleblowers does not apply.

2. The Regulations are aimed at:

2.1. Preventing mobbing, discrimination, all forms of harassment and violence;

2.2. Implementing the relevant preventive measures and addressing the effects of mobbing, discrimination, all forms of harassment and violence;

2.3. Ensuring application of liability and disciplinary actions in the cases of mobbing, discrimination, all forms of harassment and violence;

2.4. Building positive corporate climate and strengthening relationship among staff members as well as with relations with the employer;

2.5. Creating a safe working environment in which a staff member or group of staff members is not subjected to any hostile, unethical, degrading, humiliating, aggressive, abusive, insulting or harassing actions, which violate the honor and dignity of an individual or group of individuals, or the physical or mental integrity of a person, or which are intended to intimidate, embarrass or force the staff member or group of staff members into powerless state.

3. To ensure transparency as well as uniform and comparable HR management processes, actions to be proceeded in case of reported conduct are performed based on the methodology that is uniform across the entire ORLEN Capital Group, while also considering the specific characteristics of each company within the Group.

4. These Regulations apply to all staff members of the Company.

## CHAPTER II TERMS AND DEFINITIONS

5. Terms used herein shall be defined as follows:

**Employer** – the Company for whose benefit and under whose authority a natural person has undertaken to perform a work function for remuneration under an employment contract. Actions on behalf of the Company are carried out by General Director and the Company's Board of Directors or their authorized representatives.

**Staff members (employees)** – natural persons with legal capacity in labor relations under Labour Code of the Republic of Lithuania who undertook to perform job under an employment contract for remuneration.

**Commission** – a collegial body established to examine reported cases of conduct or actions with indications of mobbing, discrimination, harassment and violence.

**Discrimination** – creating unequal conditions for employees or unequal treatment of staff members on grounds of age, gender, disability, racial origin, convictions or views, nationality, citizenship, ethnic origin, language, confession, religion, union membership, sexual orientation, social status as well as due to employment for a definite period or indefinite period, or full-time or part-time work.

**Mobbing** – systematic, recurring, and prolonged unacceptable behavior in which an employee is continuously humiliated, isolated, intimidated, or belittled with the aim of undermining his/her professional reputation, work performance, or creating a hostile work environment.

**Unacceptable behavior** – any actions, communication, or situations causing disrespect, threat, psychological or physical discomfort, disrupting cooperation, violating a person's dignity, or creating an unsafe, hostile, or degrading environment.

**Complaint** – a written, free-form submission of information regarding a potential case of mobbing, discrimination, harassment, or violence. The scope of these Regulations covers Complaints received by Director of Human Resources or Director of Legal Department (in accordance with Par. 23 hereof) regarding behavior/actions exhibiting signs of mobbing, discrimination, harassment, or violence. Complaints received through the anonymous reporting system shall be registered, investigated, and stored in accordance with the Rules on Anonymous Reporting of Irregularities, while reports received by Ethics Officer shall be registered, investigated, and stored in accordance with the Regulations on Election and Activities of Ethics Officer. All reports received by Ethics Officer that require investigation of behavior/actions exhibiting signs of mobbing, discrimination, harassment, or violence shall be immediately forwarded by Ethics Officer for investigation as prescribed by these Regulations.

**Harassment** – any unacceptable behavior the purpose or effect of which is violation of person's dignity and creation of an intimidating, hostile, degrading, or offensive environment.

**Social status** – an employee's acquired education, qualifications, owned property, earned income, the need for state support as established by legal acts, family status, and/or other factors related to a person's financial (economic) status.

**Violence** – physical, psychological, sexual, or economic impact on an employee that causes or may cause harm, as well as violence that employees may experience from clients, contractors, or other third parties.

Other terms used herein shall be understood as defined in the Company's Collective Agreement, Labor Code of the Republic of Lithuania, Law on Safety and Health at Work of the Republic of Lithuania, and other legal acts.

### **CHAPTER III**

#### **KEY PRINCIPLES OF PREVENTION OF MOBBING, DISCRIMINATION, VIOLENCE AND HARRASSMENT**

6. Company's staff members, in exercising their rights and fulfilling their duties, must comply with legal acts, respect the rules of social conduct, act in good faith, and be guided by the principles of reasonableness, fairness, and honesty.

7. In its activities the Company adheres to the principles of gender equality, non-discrimination, and the prohibition of harassment and violence, as established in the Labor Code of the Republic of Lithuania, the Law on Equal Opportunities for Women and Men of the Republic of Lithuania, and other legal acts.

8. Decisions related to hiring, termination of employment, performance appraisal, remuneration, promotion, granting of leave, workplace conduct, and other relevant matters are made in accordance with the principles of equal treatment, considering objective criteria and circumstances.

9. The Company organizes trainings on mobbing, discrimination, harassment and violence prevention for its staff members and provides them with access to such trainings.

10. In organizing its activities, the Company creates a safe and open working environment in which individual differences, potential, and contributions of all staff members are recognized and valued.

11. The Company takes measures and ensures that employees who submit a Complaint or participate in examination of Complaint are protected from hostile behavior or retaliation and from any related negative effect.

12. The Company takes all possible measures and ensures that a staff member who has experienced violence or harassment at work is provided with all necessary assistance and support, such as legal consultation, medical assistance, and information about other available support options.

13. Staff members shall comply with the core values and standards of conduct established in ORLEN Group Code of Ethics and respect the rights of individuals. Staff members shall respect the dignity of others, interact with each other in a polite and respectful manner and ensure a working environment in which other persons are not subjected to any hostile, unethical, degrading, humiliating, aggressive, abusive or insulting behavior. Harassment and/or violence, unethical and disrespectful behavior towards the staff members and other persons in the Company is prohibited.

14. Staff members must prevent any actions exhibiting signs of mobbing, discrimination, harassment, or violence and must report such actions to their immediate or higher-level superior and to the Company's Director of Human Resources, and, in cases specified in Par. 23 hereof, to Director of the Legal Department. Complaint may also, where necessary, be submitted anonymously in accordance with the procedure and methods established in the Rules on Anonymous Reporting of Irregularities.

15. The exercise of rights and performance of duties established by legal acts shall not be considered mobbing, discrimination, harassment, or violence, except in cases where such rights and/or duties are abused.

#### **CHAPTER IV**

#### **POSSIBLE FORMS OF VIOLENCE AND HARRASSMENT AND METHODS OF IDENTIFICATION**

16. The Company adheres to the principle that any form of violence, harassment, including sexual harassment, discrimination, psychological violence or mobbing, as well as other inappropriate behavior or abuse of position, is prohibited, unacceptable, and incompatible with the standards of employee conduct.

17. Violence, harassment, and mobbing in the workplace may manifest in various forms. Most common forms are, including but not limited to:

17.1. Psychological violence and mobbing:

- Systematic, continuous, and inappropriate criticism, mockery, and humiliating comments;
- Intentional ignoring, withholding of information, or isolating the employee;
- Defamation, spreading rumors, undermining reputation;
- Unfounded accusations, constant psychological pressure, intimidation;
- Unreasonably and unjustifiably increased workload or tasks with the aim of undermining the employee.

17.2. Discriminatory behavior:

- Behavior or actions, including unequal requirements, based on protected characteristics such as gender, age, race, nationality, ethnic origin, religion, disability, sexual orientation, social status, type of employment contract, etc. Offensive or degrading comments related

to these characteristics.

17.3. Sexual harassment:

- Unwanted sexual advances, suggestions, hints, or comments;
- Sending or displaying sexually explicit images or messages;
- Unwanted, deliberate physical contact, etc.

17.4. Physical aggression and violence:

- Use of physical force or attempt to use it;
- Threats of harm, aggressive gestures, or intimidation;
- Intentional actions that may cause physical pain or harm.

17.5. Inappropriate organizational behavior:

- Changing working conditions without justification with the aim of exerting pressure;
- Deliberate restriction of information, non-provision of necessary work tools;
- Biased evaluation or continuous imposition of unreasonable and disproportionate

requirements.

18. To prevent violence and harassment in the workplace and to avoid the recurrence of such behavior, it is important to identify the signs of violence as early as possible. Typical signs of violence are, including but not limited to:

- Targeted conduct;
- Abuse of power or authority;
- Recurrence;
- Duration;
- Formation of informal groups against a specific individual;
- A sense of fear, tension, or insecurity when working with a particular individual;
- Downgraded team performance.

19. Employees who observe unacceptable behavior or have concerns about inappropriate or unwanted conduct toward themselves or others may, if they feel safe and it does not conflict with their interests, make it clear to the individual exhibiting such behavior that it is unacceptable and must stop. Where the situation is unsafe or the employee does not feel able to act, it is recommended to immediately contact the responsible Company representatives, as specified in Par. 14 herein.

20. The list of forms of violence and harassment is not exhaustive. Such actions may also manifest in other ways that are not obvious but still create an unpleasant, intimidating, degrading, or offensive work environment.

21. More details on identification methods and forms of violence and harassment are available in methodological recommendations and guidance materials provided by the State Labor Inspectorate. Active links available at the time of issue of these Regulations: <https://vdi.lrv.lt/lt/darbuotoju-sauga-ir-sveikata/metodines-rekomendacijos/> and

[http://www.vdi.lt/AtmUploads/Smurtas\\_Priekabiavimas.pdf](http://www.vdi.lt/AtmUploads/Smurtas_Priekabiavimas.pdf).

## **CHAPTER V**

### **SUBMISSION OF COMPLAINTS**

22. Staff member who thinks that he/she has suffered from mobbing, discrimination, harassment or violence has the right to submit a reasoned signed free-form Complaint in writing or by e-mail. The Complaint must specify what happened (specific actions, words, or conduct), the date(s) / duration and location(s) of the incident, who was involved (names, surnames, and positions, if known), whether there were any witnesses (if so, their names, surnames, and positions), and how it affected the employee's well-being or work. It is recommended to submit any available evidence together with the Complaint, such as email correspondence, photographs, copies of documents, recordings, etc.

Complaint is presented either in writing or by e-mail:

22.1. To Director of Human Resources;

22.2. To Ethics Officer of the Company;

22.3. Through the anonymous reporting system.

23. In situations where the alleged acts of mobbing, discrimination, harassment, or violence are committed by an employee from the Company's Human Resources Department, or if the Complaint is submitted by an employee from the Company's Human Resources Department, the Complaint must be submitted to Director of Legal Department. Director of Legal Department, upon receiving a Complaint, shall carry out all actions described herein that are assigned to Director of Human Resources.

24. It is recommended that the Complaint be submitted as soon as possible after the occurrence of the complained actions or after they became known.

25. Complaint may also be submitted by another employee of the Company who has not personally experienced behavior exhibiting signs of mobbing, discrimination, harassment, or violence, if employee reasonably believes that such behavior is being directed at employee's colleague. Such Complaints shall be deemed duly submitted if they are provided in writing or by e-mail, indicate the date, and are signed by the person submitting the Complaint.

26. The received Complaint shall be treated as confidential information, and its details shall not be disclosed in any form to persons who are not related to the alleged violation or its investigation, unless the reporting/affected person has already disclosed such information themselves.

27. The reporting/affected person may choose that his/her intent is to warn the individual to refrain from inappropriate actions in the future, without initiating a formal investigation. Such intent must be clearly stated in the Complaint. In such a case, Director of Human Resources shall initiate

and organize separate or joint informal meetings with/between the accused and the reporting/affected person with the aim to clarify disagreements, reintroduce the accused to the Rules and other relevant documents drawing particular attention to concerns raised and implement preventive measures. This provision shall not apply in cases of alleged violence, sexual harassment, or other situations posing a particular threat and in such cases, an investigation shall be mandatory regardless of the request of the affected person.

## **CHAPTER VI**

### **EXAMINATION OF COMPLAINTS**

28. Complaints shall be examined in line with the following key principles:

28.1. Directness – all persons concerned (the complainant, the accused, witnesses) are provided with possibility to present explanations on their actions;

28.2. Expediency – Complaints are examined within the shortest period possible;

28.3. Support to the affected – psychologically safe and secure work environment provided;

28.4. Objectivity and impartiality – examination is conducted objectively without any prejudice;

28.5. Innocence – the accused is deemed innocent until it is concluded that he/she made a violation or conducted improperly.

29. The Commission shall consist of an odd number of members from among the following:

29.1. Permanent members of the Commission whose appointment does not require an order from Director of Human Resources:

29.1.1. Director of Human Resources or employee substituting Director of Human Resources, acting as the Chair of the Commission and acting as a permanent member of the Commission;

29.1.2. Director of Production, acting as a permanent member of the Commission;

29.1.3. Legal Adviser delegated by Director of Legal Department, acting as a permanent member of the Commission.

29.2. For investigation of specific Complaint, additional members of the Commission may be appointed by order of Director of Human Resources:

29.2.1. Ethics Officer;

29.2.2. Representative from Trade Union, if so requested by the employee who submitted the Complaint or the accused. If representative from Trade Union is appointed when examination of Complaint is already in progress, previously held meetings and conducted interviews shall not be repeated but representative from Trade Union shall be entitled to familiarize with all records and documents of the case;

29.2.3. Additional members as may be needed for each specific case.

30. The Chair of the Commission shall appoint a secretary for the meeting to prepare the minutes. It is recommended to appoint a permanent secretary for the meetings.

31. The Commission cannot work without its permanent members. If, due to objective reasons (long-term sick leave, vacation, etc.), a permanent member of the Commission is unable to participate in the Commission's work during the specified period, Director of Human Resources shall appoint another person to replace the absent permanent member in the specific case.

32. Commission cannot be membered by:

32.1. A person to whom a Complaint refers (the accused);

32.2. Manager of organizational unit in which a complaining staff member is employed;

32.3. A spouse or relatives by affinity of a complaining staff member or persons bound to a staff member by other legal or actual ties that may give rise to doubts as to impartiality of such persons;

32.4. Secretary of meeting.

33. If persons indicated in Par. 32 are in the composition of the Commission, Director of Human Resources shall form a Commission of different composition.

34. Considering the extent of the alleged improper behavior indicated in the employee's Complaint and factual circumstances, the validity of the Complaint may be assessed without appointing additional members to the Commission. In such a case, Director of Human Resources, in consultation with permanent members of the Commission, shall refer the Complaint to relevant organizational units of the Company for clarification/validation within their capacity and area of activity. Validation of Complaint constitutes initial assessment of circumstances to determine whether there are grounds to initiate a formal investigation. Validation shall not exceed 14 days.

35. Director of Human Resources, upon receiving an employee's Complaint or information confirming the validity of the Complaint in accordance with Par. 34 hereof, shall within 3–5 working days appoint additional members to the Commission if necessary.

36. The Chair of the Commission shall convene a meeting, and the Commission shall proceed with examining the Complaint immediately, in any case no later than within 7 working days from the formation of the Commission. A meeting of the Commission and its power of decision shall be deemed valid, when all permanent members are present.

37. The Commission must make every effort to examine the Complaint within 30 days from the start of its work.

38. During the first meeting of the Commission, the Chair, members and secretary of the Commission shall sign the relevant declarations in the form in Annex 1 hereto.

39. The Commission shall hear the explanations of the affected employee and the persons whose alleged improper conduct gave rise to the Complaint and shall collect relevant information from witnesses. The Commission shall be entitled to access all documents, email correspondence, and other information necessary to establish the factual circumstances.

40. After collecting the evidence, the Commission by a simple majority vote shall adopt a

decision on the Complaint and present its conclusions regarding the validity of the Complaint. The conclusion of the Commission may be:

- Complaint valid;
- Complaint invalid;
- Abstained;
- Other (depending on the situation).

Justified conclusion of the Commission shall be included into the minutes. Minutes shall be signed by all members and secretary of the Commission.

41. The affected employee, person whose alleged improper conduct gave rise to the Complaint, and witnesses shall be familiarized with their explanations and/or statements described in the minutes.

42. Director of Human Resources, upon receipt of the minutes from the Commission (if Director of Human Resources was not a member of the Commission) together with all collected evidence, and, if necessary, after consulting with General Director, shall take appropriate decisions with regard to the employees involved.

43. Director of Human Resources shall provide feedback to the employee who submitted the Complaint on whether the Complaint was classified as valid or invalid and on conclusions reached, indicating the decision and the investigation conclusion or excerpts thereof.

44. Director of Human Resources shall take active measures to provide, as needed, assistance to persons who have experienced mobbing, discrimination, violence, or harassment (legal, psychological, medical assistance; where possible, granting vacation outside schedule, transfer to another shift/organizational unit, remote work, etc.).

## **CHAPTER VII FINAL PROVISIONS**

45. Activities of the Commission related to examination of Complaints and information are of confidential nature. Members of the Commission, secretary, affected person, person whose alleged improper conduct gave rise to the Complaint, and witnesses shall keep all information made available during the work of the Commission confidential. Before meetings, interviews the Chair of the Commission shall inform the persons involved on confidentiality requirements.

46. Documents collected by the Commission and its minutes shall be registered and stored in Human Resources Department or, when the Complaint is submitted to Director of Legal Department in the cases specified in Par. 23 hereof, in Legal Department for 3 years, ensuring confidentiality of information. Documents shall be stored in soft copies on K drive and, if presented in hard copies, in hard copy document files/binders.

47. Personal data contained in documents shall be processed in line with the requirements of the applicable legislation governing personal data protection. Data subjects who intend to submit Complaint regarding alleged mobbing, discrimination, harassment, or violence shall

be provided, in addition to these Regulations, with an information notice (Annex 2) containing information on the processing of personal data.

48. Director of Human Resources shall be responsible for periodic review of these Regulations and update thereof, if necessary.

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Prepared by:  
Deputy Director of Human Resources

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(Commission member/secretary Name Surname)

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(organizational unit)

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(job position)

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(date)

**DECLARATION BY THE MEMBER/SECRETARY OF THE COMMISSION  
CONCERNING COMPLAINT No \_\_\_\_\_**

In view of my appointment as **a member/secretary of the Commission** examining a Complaint concerning mobbing/discrimination/harassment/violence (delete as appropriate) submitted by:

\_\_\_\_\_, \_\_\_\_\_ (Name Surname of complaining person) (position of complaining person) \_\_\_\_\_ (date of complaint)

I hereby declare that:

- I am not a spouse of the persons associated with the examination proceeding or a close or distant relative, to the second degree, or a person bound to him/her/them by other legal or actual ties that may give rise to doubts as to my impartiality;

- I commit to treat all information made available to me during proceedings in the Commission as confidential and not disclose it to any third parties.

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(signature)

## INFORMATION NOTICE

This information notice has been prepared in accordance with the Company's Regulations on Prevention of Mobbing, Discrimination, Harassment and Violence (hereinafter, the Regulations) and is intended for employees (data subjects) who submit, in accordance with the procedure established by the Regulations, a complaint on alleged mobbing, discrimination, harassment or violence (hereinafter, the Complaint).

Data shall be processed in compliance with the requirements of the General Data Protection Regulation (EU) 2016/679 (GDPR) of 27 April 2016.

### 1. Data controller

Data controller – AB ORLEN Lietuva

Company code: 166451720

Address: Mažeikių St. 75, Juodeikiai Vil., 89453 Mažeikiai Distr. Municipality

E-mail: post@orlenlietuva.lt

Tel.: +370 443 92121

In case of additional questions concerning data processing, please contact Data Protection Officer: dap@orlenlietuva.lt

### 2. Purpose of data processing

Your personal data will be processed for the following purpose:

- to accept and examine Your complaint regarding alleged mobbing, discrimination, harassment, or violence;
- to assess potential violations and/or conduct investigation;
- to fulfill the Company's legal duty to ensure a safe, respectful and dignified working environment.

### 3. Categories of processed personal data

Examination of Your complaint may involve the processing of the following personal data:

- name, surname;
- e-mail address;
- job position;
- signature;
- content of Your complaint;
- Information (data) about an allegedly unlawful act (mobbing, discrimination, harassment, or violence) committed against You.

With Your Complaint, please provide only personal data that is necessary for the purposes of examination of Your Complaint.

### 4. Legal basis for personal data processing

Personal data shall be processed in accordance with:

- Article 6(1)(c) of GDPR – compliance with a legal obligation (Article 30 of the Labor Code of the Republic of Lithuania);
- Article 6(1)(f) of GDPR – legitimate interest of the Company to ensure safe working environment and to properly investigate possible violations.

### 5. Storage of data

- Claims and documents related to them, including minutes of meetings, shall be stored in soft copies on K drive and, if presented in hard copies, in hard copy document files/binders. Access to these documents shall be restricted (for more details see Par. 6).
- Personal data shall be stored for 3 (three) years after the date of submission of Claim, unless a longer period of storage is established by applicable legal regulations.
- After expiry of storage period, the data shall be safely disposed off as prescribed by internal regulations of the Company.

#### 6. Access to data

Access to Claims and documents related to them, including minutes of meetings, shall be restricted exclusively to:

Director of Human Resources and employee substituting Director of Human Resources;  
Director of Legal Department;  
Permanent members of the Commission;  
Permanent secretary of the Commission.

#### 7. Transfer of data

Data provided in the Complaint submitted by the data subject may be transferred:

- Within the Company – to the members and the secretary of the Commission assigned as prescribed by the Regulations as well as other subjects which may be involved in investigation and/or may have some essential information related to investigation. In any case, all persons specified above shall sign non-disclosure agreements;
- To competent/law enforcement authorities – only as prescribed and in the scope established by law.

#### 8. Rights of the data subjects

You, as a data subject, have the following rights guaranteed:

- the right to access Your personal data being processed;
- the right to request the rectification of inaccurate data or the completion of incomplete data;
- the right to request the erasure of personal data where there is a legal basis for doing so;
- the right to restrict the processing of personal data;
- the right to object to processing where it is based on legitimate interests;
- the right to lodge a complaint with the State Data Protection Inspectorate.