

AB ORLEN LIETUVA

APPROVED BY:

General Director

_____ 2026

Order No TV1(1.2-1)-2026-

SUSTAINABILITY POLICY

I. PURPOSE AND SCOPE OF APPLICATION

1.1. AB ORLEN Lietuva (hereinafter, the Company) Sustainability Policy (hereinafter, the Policy) is the Company's commitment to purposefully form and develop a sustainable corporate culture. The provisions of this Policy shall apply only to the Company. All Company employees, managers and members of the Management Board shall be familiar with the present Policy and follow the provisions of it.

1.2. **The purpose of the Policy** shall be to establish the Company's key sustainability priorities and define clear commitments and objectives within each area in accordance with the applicable Company policies, provisions of [Integrated Management System Policy](#) and other related internal Company documents and regulations.

1.3. Provisions of this Policy shall not contradict Company's internal legal acts, applicable policies and standards, ORLEN Group business strategy plan and ORLEN Group strategy.

1.4. For the purpose of implementation of this Policy, the Company shall follow international agreements, principles and standards, including United Nations Sustainable Development Goals, [Paris Agreement](#), [European Green Deal](#), principles of the United Nations Global Compact and other sustainability recommendations.

II. GENERAL SUSTAINABILITY PRINCIPLES, GOALS AND COMPANY VALUES

2.1. The Company is a subsidiary undertaking of ORLEN S.A. implementing ORLEN S.A. politics and standards. By complying with the aforementioned politics and standards and applying them in its operations, the Company shall also undertake to regularly improve its activities and compliance with sustainability standards.

2.2. Company shall undertake to consistently aim for progress in all areas of sustainability (environmental, social and governance) (hereinafter, ESG) where the most significant impact can be realized, at the same time reducing the negative impact on environment, employees and other stakeholders (e.g., clients, partners, suppliers, communities and other persons having business, communal or other types of relations with the Company).

2.3. Recognizing the importance of sustainable corporate development, the Company shall responsibly take part in implementing joint [ORLEN Group strategy](#), assessing the need of stakeholders for sustainable corporate development and aiming for balance between financial and non-financial benefits.

2.4. The Company shall invoke the following values incorporated in the entirety of ORLEN Group and recognized under [Code of Ethics](#):

- **responsibility** – business, community, environment;
- **development** – innovation, competitiveness, modernity;
- **people** – ethics, professionalism, cooperation;
- **energy** – strength, courage, success;
- **reliability** – safety, quality, compliance.

2.5. The Company shall operate in accordance with the relevant national and European Union legislation, standard requirements, shall collect and publish information on Company's sustainability in the consolidated report of ORLEN Group management.

III. ENVIRONMENTAL GOALS AND OBLIGATIONS OF THE COMPANY

3.1. The Company's environmental goals and obligations shall be to:

3.1.1. ensure compliance with the relevant environmental requirements, legal and other requirements, regularly monitor legislative trends and developments, operate by employing the best practice and ensuring compliance with the highest environmental standards;

3.1.2. continuously develop areas of operations and management systems, identify environmental protection aspects, assess their environmental impact and set principles for their effectiveness and management;

3.1.3. ensure access to information about Company's environmental impact, promote awareness of environmental protection policy and efficiently implement policy's objectives;

3.1.4. enhance employee competence and raise environmental awareness, prioritize employee professional development in this area, encourage employees to submit suggestions regarding improvement of environmental protection and report hazardous areas;

3.1.5. use natural resources responsibly, encourage rational and efficient methods and practices for their utilization, aiming to implement the principles of circular economy;

3.1.6. minimize negative environmental impact by reducing, controlling and limiting pollution, aim for mitigating the negative impact on human health and implement innovations and latest technology to increase positive environmental impact:

3.1.6.1. annually reduce Scope 1, 2, and 3 greenhouse gas (GHG) emissions (hereinafter, the Company's carbon footprint);

3.1.6.2. together with ORLEN Group, contribute to implementation of the [European Green Deal](#) and the [Paris Agreement](#) objectives in order to reduce GHG to zero by 2050;

3.1.6.3. enact Policy implementation plan, approved by the General Director's order which sets out the Company's action plan, expected results, schedules and the persons responsible for implementation of the present Policy;

3.1.6.4. calculate the carbon footprints of the Company's products and operations;

3.1.6.5. reduce the amount of non-methane volatile organic compounds, oxides of nitrogen and sulfur;

3.1.6.6. reduce water use, protect and restore aquatic ecosystems, enhance the efficiency of water resource management and wastewater treatment every year (including closed-loop water reuse and the reutilization of treated wastewater);

3.1.6.7. replace hazardous substances or substances of very high concern with less hazardous substances where possible;

3.1.6.8. reduce amount of hazardous and non-hazardous waste, ensure safe, effective and proper handling of them, encourage employees to recycle and properly manage contaminated areas;

3.1.6.9. ensure effective prevention of industrial accidents that could be harmful to environment and elimination of their consequences;

3.1.6.10. systemically transform operations, including production of sustainable products;

3.1.6.11. apply preventative measures to reduce environmental pollution and manage its effects;

3.1.7. require the Company's suppliers and contractors to comply with applicable environmental standards, complete the ESG questionnaire provided in Attachment No 1 to the present Policy at the Company's request and take other measures to reduce negative impact on the environment and climate;

3.1.8. cooperate with business partners to find new solutions that are as environmentally friendly and climate neutral as possible;

3.1.9. increase energy efficiency and integrate renewable energy sources in all operations of the Company;

3.1.10. plan investment projects according to their environmental impact and implement them in a way that minimizes that impact, while protecting, conserving and restoring biodiversity and ecosystems;

3.1.11. regularly monitor and improve the Company's sustainability results in the area of environmental protection, assess and control the progress;

3.1.12. conduct environmental studies, research and programs, advance the digitalization of operational processes, improve monitoring and control processes and reduce environmental impact;

3.1.13. publish monthly data from the Automated Emission Metering System on the website ([Automated Emissions Metering System](#)) and provide information on the compliance of emissions with limit values.

3.1.14. on the website ([Data and Reports of Non-continuous Measurements](#)), publish non-continuous measurements: quarterly monitoring reports, monthly quantities of extracted water and discharged effluents, annual environmental impact reports of the crude oil refinery products;

3.1.15. carry out activities in accordance with the international environmental management standard [ISO 14001](#).

IV. SOCIAL RESPONSIBILITY OBLIGATIONS AND GOALS OF THE COMPANY

4.1. To ensure sustainable and socially responsible practices, the Company's goals and obligations shall be to:

4.1.1. set higher operational standards than those required by legislation, carry out operations in accordance with relevant legal acts and evaluate them based on the adopted principles and standards;

4.1.2. prioritize development of employees and provide all the conditions necessary to implement the tasks and objectives of social responsibility;

4.1.3. ensure uninterrupted functioning of operational processes and smooth integration of new employees into the Company's activities;

4.1.4. encourage long-term employee engagement and loyalty, increase employee potential and competence;

4.1.5. increase gender equality for both women and men to have equal opportunities to pursue career and growth, as well as ensure equal employment opportunities;

4.1.6. encourage employee involvement in social responsibility initiatives;

4.1.7. respect social, economic and cultural laws of stakeholders and apply policies, standards and operational practices to ensure continuous improvement;

4.1.8. share success by collaborating with stakeholders in relevant community development programs;

4.1.9. consult with representatives of stakeholders on issues within the scope of their activities, inform them of Company's operations in an accurate, transparent and timely manner;

4.1.10. create and implement systems for risk identification and control, as well as effective decision making, and reduce the number of accidents to a minimum by utilizing the required occupational safety tools and equipment;

4.1.11. work with supplier that continuously improve their operations and strive to meet the highest market expectations, that comply with principles set out in the [Supplier Code of Conduct](#), submit declarations to the Connect platform which serve as essential basis for supplier evaluation;

4.1.12. ensure that all occupational health and safety requirements are met by ensuring proper compliance with international occupational health and safety management standard [ISO 45001](#):

4.1.12.1. ensure safe and healthy working conditions;

4.1.12.2. continuously perform assessment of employee and process safety risk, eliminate and/or reduce identified hazards and risks, investigate incidents and implement preventative measures in order to avoid incidents in the future;

4.1.12.3. create opportunities to report occupational safety violations and shortcomings;

4.1.12.4. motivate employees to work safely and encourage their participation in creating a safe environment, ensuring proper preparedness in the event of emergencies and a high level of human health and environmental protection by implementing prevention, elimination and investigation of industrial accidents;

4.1.12.5. provide consultations on occupational health and safety to Company's employees and to employees of partner organizations with which the Company maintains contractual relationships, including individuals assigned specific responsibilities, e.g. OHS Coordinator.

4.1.12.6. ensure access to information on the impact of Company's operations on occupational safety and health;

4.1.13. adhere to the highest standards of ethics and principles of business ethics set out in the [Code of Ethics](#) to ensure that relationships are based on tolerance and mutual respect;

4.1.14. respect and secure human rights both within the Company and in relations with stakeholders throughout the entire supply chain;

4.1.15. ensure strict compliance with Company's [Regulations on Prevention of Mobbing, Discrimination, Harassment and Violence](#), [ORLEN Group Human Rights Protection Policy](#) so all employees have equal opportunities irrespective of their gender, race, age, religion, sexual orientation, disability and other beliefs or views;

4.1.16. maintain an open and tolerant work environment, ensure respectful treatment of all Company employees, condemn behavior and actions that aim to offend people's dignity, especially bullying, discrimination and all types of harassment;

4.1.17. encourage employees not to tolerate discrimination, harassment or signs of criminal activities;

4.1.18. implement transparent remuneration system, perform yearly payment evaluation;

4.1.19. encourage healthy lifestyle by implementing health and wellness programs: ample package of additional benefits, pension accumulation, sports activities, various initiatives, health insurance coverage;

4.1.20. provide conditions for forming trade unions and recognize employees' right to collective bargaining;

4.1.21. support culture and sports, maintain close contact with local communities and other stakeholders, foster a positive impact on the society and follow Regulations for Communication with Local Communities.

V. GOVERNANCE OBLIGATIONS AND GOALS OF THE COMPANY

5.1. To ensure responsible and transparent operations, the Company's governance obligations and goals shall be to:

5.1.1. ensure that all activities are defined in a structured way, carried out impartially and managed in a way that ensures their impartiality;

5.1.2. ensure compliance with all environmental, information security and personal data protection, legal and other requirements;

5.1.3. continuously strengthen the principles of good governance: adhere to best practices and international standards, and implement preventative measures to mitigate potential violations;

5.1.4. maintain zero tolerance for any signs of corruption or fraud, implement anti-corruption policy and build corruption-resilient work environment;

5.1.5. ensure that employees of the Company or its subsidiaries or third parties have opportunities to voluntarily and anonymously report significant irregularities related to mobbing, equal opportunities, discrimination and other violations, as set out in the Company's [Rules on Anonymous Reporting of Irregularities](#);

5.1.6. ensure access to information on the impact of Company's operations and that all collected and generated data is properly, effectively and securely managed;

5.1.7. organize activities to comply with international information security management standard [ISO/IEC 27001](#).

VI. ECONOMIC SUSTAINABILITY OF THE COMPANY

6.1. The Company's economic sustainability obligations and goals shall be to:

6.1.1. actively support the reinforcement of Lithuania's energy independence;

6.1.2. continually improve technology, increase economic efficiency of production processes, ensure increase in EBITDA (*Earning Before Interest, Taxes, Depreciation and Amortization*) and investments for development, optimization of general and staff expenditures and increase of cash flow;

6.1.3. expeditiously meet the clients' needs by monitoring, assessing and anticipating market trends, producing high-quality products and providing services in accordance with applicable standards and international quality management standard [ISO 9001](#);

6.1.4. operate in the market with transparency and in compliance with competition regulations, focusing on profitability and returns while safeguarding the interests of the Company and its shareholders;

6.1.5. pay taxes honestly and diligently, prepare financial statements with utmost transparency;

6.1.6. work with reliable partners that are committed to the highest standards of work ethics, improvement of their operations, and aim to comply with the highest market expectations.

VII. FINAL PROVISIONS

7.1. The Company shall undertake to follow the provisions of the present Policy in its operations and decisions, to follow the provisions of the [Integrated Management System Policy](#) that meets the requirements of international standards for quality management (ISO 9001), environmental management (ISO 14001), occupational health and safety management (ISO 45001), information security management (ISO/IEC 27001) and the general requirements for the competence of testing and calibration laboratories (ISO/IEC 17025).

7.2. All Company employees shall be expected to follow the present Policy, while business partners, suppliers and other stakeholders are expected to comply with the principles of the present Policy and applicable environmental standards while cooperating with the Company. Suppliers shall also be expected to complete the ESG questionnaire provided in Attachment No 1 at the Company's request which would enable the achievement of sustainability goals set out in the Policy Implementation Plan, approved by the General Director's order.

7.3. The Company shall ensure that the present Policy is publicly available on Company's website at: <https://www.ornenlietuva.lt>.

7.4. The Policy shall be regularly reviewed and updated at least every two years or after a significant change to ORLEN Group strategy, Company's organizational management structure, taking into account amendments to legislation, good practice and/or other significant circumstances.

7.5. In cases specified in paragraph 7.4 of this Policy, the review and update of the Policy shall be initiated and coordinated by the Strategy, Development and Technology Department.

7.6. The Policy and any amendments shall come into force upon approval by the General Director of the Company, unless otherwise specified in the document.

VIII. ATTACHMENTS

Attachment No 1. ESG questionnaire

Prepared by:
Engineer (for sustainability)