



**ORLEN**  
UNIPETROL

**20  
24**

Report on Sustainable  
Development of the  
**ORLEN Unipetrol**  
**Group**





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# Letter from the Chairman of the Board of Directors

Dear ladies and gentlemen,

We are committed to developing sustainable solutions to help improve the quality of life in all countries and regions where we operate in the long run. In recent years, we have taken numerous specific steps and measures to implement our strategic vision. We are gradually fulfilling the commitments we made. Together with our parent ORLEN Group, we are transforming our business into a multi-energy company. This transformation concerns the refining, petrochemical, energy, and retail segments.

We are facing two parallel transformations in Europe: the green transition focused on sustainability, and the security transition concerning reliable energy supplies. Where do our commitments take us?

The main areas of our transformation include decarbonizing our production facilities, developing alternative energy sources, and applying the principles of the circular economy, which would allow for the extensive involvement of plastic and natural waste back in the production cycle. Last year, we successfully completed our preparations for switching to processing new crude oil blends well in advance. We managed well in the retail segment in Czechia, Hungary, and Slovakia. We also continued to make a high rate of investments from recent years, spending a record-high of CZK 13.8 billion on the modernisation and development. Generally, however, last year was marked by the ongoing complicated macroeconomic situation, particularly in the petrochemical segment. Our financial results were also affected by three significant one-time events. We recorded the provisions for terminating PVC and caprolactam production at our subsidiary, Spolana, and the provisions for subsequent site decontamination. In the refining segment, we organised a nearly two-month turnaround in the spring associated with revitalising the Litvínov Refinery. In August, the Litvínov Refinery was again out of operation for two more weeks due to the discovery of a WWII aerial bomb. I would like to take this opportunity to express my sincere gratitude to all employees. They showed extraordinary and professional commitment to resuming production activities safely and as soon as possible. Thanks to their efforts and determination, we can manage challenging situations without compromising the health of our employees or the environment.

We give the same priority to the protection of our colleagues in the workplace as we do to the environmental aspects. We are proud of our safety culture, as we closed the year 2024 without any serious injuries. We have become one of the best and most attractive employers in Czechia. The certificates awarded to our company attest to the unique and attractive position of the ORLEN Unipetrol Group in the labour market in the Czech Republic.

As one of the pillars of the Czech economy, we feel our responsibility for the energy and petrochemical future of the Czech Republic. Although crude oil will continue to be an essential raw material in the years to come, particularly for the petrochemical industry, we must now seek, find, and implement new, modern, and environmentally friendly solutions that will subsequently replace this dependence. We have a specific roadmap of activities for this decade, and we look even farther into the future. We want to reach climate neutrality by 2050. That is our contribution to a better Czechia, Europe, and the entire planet.

Mariusz Wnuk  
CEO and Chairman of the Board of Directors





# 01

## GENERAL INFORMATION





# General basis for preparation of the sustainability statements (BP-1)

The ORLEN Unipetrol Group publishes its Report on Sustainable Development for 2024, inspired by the Corporate Sustainability Reporting Directive (CSRD). We present the non-financial data on a consolidated basis for the period from 1 January to 31 December 2024. This report is published on a voluntary basis and does not need to meet all the reporting criteria, including the obligation to have an audited report. The aim of this report is to demonstrate our efforts to meet sustainability goals in accordance with the structure of the current ESRS standards for the first wave of reporting obligations and provide a true and fair view of our situation. Our parent company, ORLEN S.A., meets the reporting obligation by publishing a consolidated report for 2024.

### Scope of consolidation

The Report on Sustainable Development is a report that contains non-financial information and covers the subsidiaries specified below.

#### List of companies included in the scope of consolidation:

- ORLEN Unipetrol a.s. (corporate function)
- ORLEN Unipetrol RPA s.r.o. (refineries, petrochemistry, energy, retail, corporate function)
- ORLEN UniCRE a.s. (research)
- ORLEN Unipetrol Doprava s.r.o. (logistics)
- PETROTRANS, s.r.o. (logistics)
- Butadien Kralupy a.s. (refinery)
- SPOLANA s.r.o. (petrochemistry)
- PARAMO, a.s. (refinery)
- REMAQ, s.r.o. (petrochemistry)
- ORLEN Unipetrol Slovakia s.r.o. (wholesale, retail)
- ORLEN Unipetrol Deutschland GmbH (wholesale)
- ORLEN Unipetrol Hungary Kft. (wholesale)
- ORLEN Hungary Kft. (retail)
- HC VERVA Litvínov, a.s. (corporate function)

A relative method was applied to Butadien Kralupy a.s. The company was formed as a joint venture in April 2007.

**ORLEN Unipetrol, a.s.** is its majority shareholder with a 51% stake.

### Value chain

The Report on Sustainable Development covers our suppliers, our own production operations and customers within the double materiality assessment (DMA). The scope of the information disclosed in this report aligns both with the results of the DMA analysis and other topics we wish to address through our voluntary reporting for 2024. Additional information required by the ESRS regarding the value chain, primarily with respect to the environment, is based on estimates or results of reference values from the previous year.

### Secret and sensitive information

We did not use the option to omit certain information relating to intellectual property, know-how, or the results of innovation.



# Disclosures in relation to specific circumstances (BP-2)

## Special circumstances

No special circumstances regarding situations where the environmental, social, and administrative factors affect our business have been specified.

## Time horizons

We have defined the following time horizons:

- Short-term (<1 year)
- Medium-term (1–5 years)
- Long-term (>5 years)

In connection with the decarbonization strategy of the ORLEN Unipetrol Group, we did not depart from the definition of horizons.

## Value chain estimation

The information on the value chain is included only with respect to the parts for which this issue is significant. We assess our value chain based on a list of the 59 largest suppliers (accounting for 92.23% of total costs) and 61 largest customers (representing 72.74% of turnover) in terms of financial performance volume. When making this selection, we considered internal financial data and the significance to our business. We plan to gradually gain information through direct communication with suppliers, the introduction of ESG questionnaires to obtain relevant information, and the development of digital processes for data collection. The information from the supply chain is limited or estimated. More information about the value chain analysis and its understanding is described in the chapter

**Description of the processes to identify and assess material impacts, risks and opportunities (IRO-1)** ➤

## Sources of estimation and outcome uncertainty

We prepared the report in accordance with the currently available information, expert interpretations, and methodological inputs.

## Disclosures stemming from other legislation or generally accepted sustainability reporting pronouncements

This report contains information from other legislation, such as recognised standards and protocols. Specifically, it is the audited GHG Protocol published by the parent company ORLEN, and the Integrated Management System approved in accordance with the following standards: ISO 14001:2015, ISO 9001:2015, ISO 45001:2018, ISO 50001:2018.

## Incorporation by reference

All references regarding the described topics that supplement or support the information given in this report are also available as documents on our website.



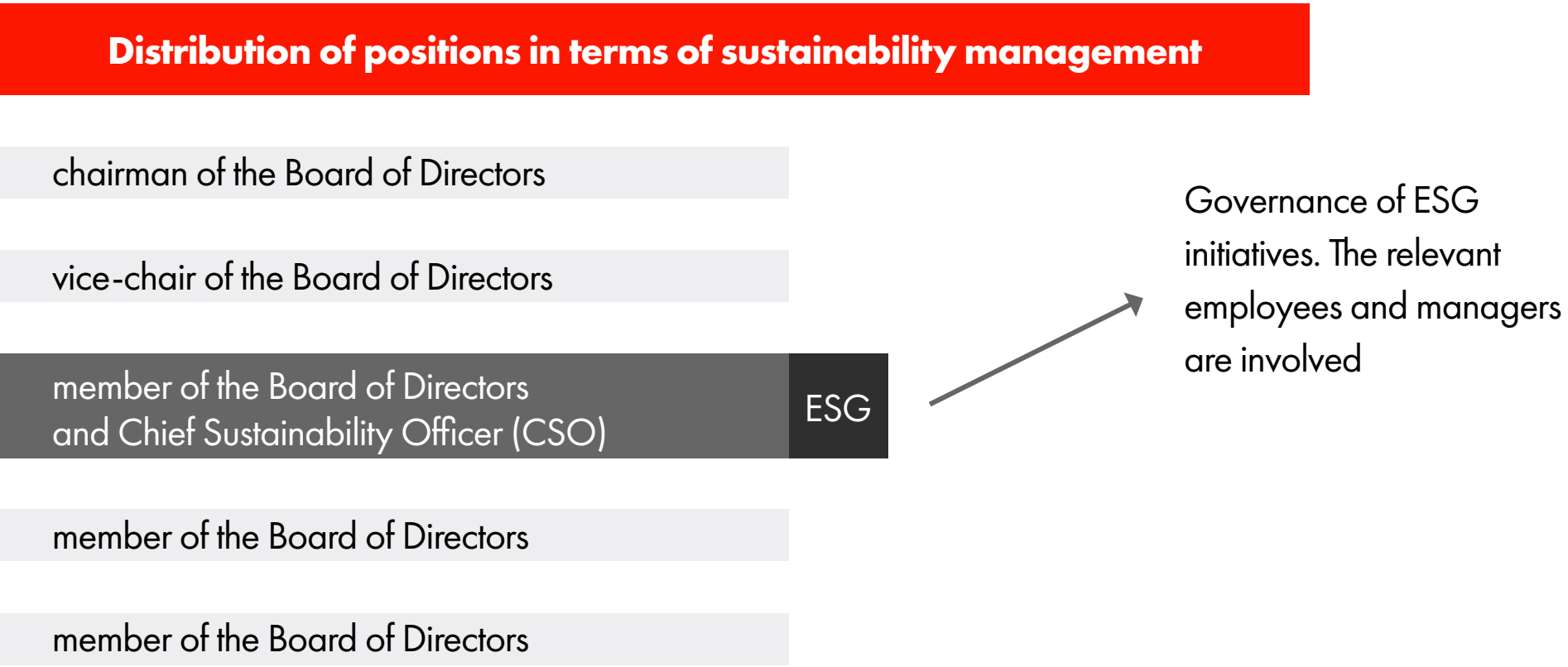
# The role of the administrative, management and supervisory bodies (GOV-1)

The Board of Directors of ORLEN Unipetrol is of the needed size and structure, taking into account the geographical distribution and business complexity. The composition of the Board of Directors was defined based on the balanced and diverse expertise criteria. The Board of Directors of the ORLEN Unipetrol Group acts as the supreme management body of the company and has collective responsibility for all company operations. The key activities of the Board of Directors focus on increasing the value for the sole shareholder, ORLEN S.A., streamlining operations and profitability, securing the transparency of corporate activities, and on sustainable operations. It also aims to ensure appropriate risk management, environmental protection, and occupational safety condition. The company is currently managed by a five-member Board of Directors. The current composition of the Board of Directors and Supervisory Board ensures versatility and diversity of these bodies, also in terms of gender, field of education, age, and practical experience of members who have the necessary knowledge and skills in managing an undertaking with a complex structure, in law and accounting, and the petrochemical industry. The Supervisory Board comprises people with many years of experience in surveillance over capital companies and with expertise in law and accounting. Employees are not elected on management and supervisory bodies. The Supervisory Board had five members at the end of 2024 - 20% of women and 80% of men.

**The Board of Directors had five members - 20% of women and 80% of men.** Full names of the members of the Board of Directors in 2024 are given in the Annual Report, Chapter 1; Company Characteristics, page 8 – **Governing and supervisory bodies**.

**We established the position of Chief Sustainability Officer (CSO) in January 2025.** This office is held by a member of the Board of Directors who is in charge of reporting and accounting, controlling, taxes, financial management, facility management, EU funds, and ESG reporting. The CSO overarches a team responsible for coordinating all activities, so the ESG development takes place in compliance with the strategy and across the Group. During the first months of activities, this team (ESG Group) dealt with reassessing double materiality and confirming or setting environmental, social, and sustainable governance KPIs. This management model aims to ensure that sustainability is managed in a complex and comprehensive way. The responsibility for impacts, risks, and opportunities is reflected in the policies that we take over from the parent ORLEN Group.

Fig. 1



The information about reporting to management and supervisory bodies that concerns management and surveillance over impacts, risks, and opportunities is gradually also addressed in the ESG Group. The issues related to dedicated checks and procedures for managing impacts, risks and opportunities are part of setting the processes for the ESG Group. The primary task is to review double materiality, where each area of impacts, risks, and opportunities is assigned to a key manager. The sustainability goals for each area are set to follow the strategy. Members of the Board of Directors and Supervisory Board appointed to perform their offices have their qualifications and experience described on the website (**ORLEN Unipetrol**). The expertise of members of the Board of Directors and managerial positions in terms of sustainability are continuously supported by the following activities:

- consultations with advisors,
- training for the management,
- continuous discussions on the risks with the management,
- meetings at the director- and executive director levels,
- meetings of the ESG Group with the Chief Sustainability Officer,
- videos on ESG on the intranet.



# Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies (GOV-2)

Sustainability matters fall within the competence of the Board of Directors, Supervisory Board, and top executives. Sustainability issues are managed via the Chief Sustainability Officer. The ESG Reporting Unit coordinates sustainability topics across the entire company, so the social, environmental, and governance issues are incorporated in the decision-making of all

management levels. The DMA process was launched with a workshop held on 2 November 2023, which presented the DMA concept and methodology to the relevant managers. It took place from November 2023 to March 2024. At the beginning of 2025, the DMA was updated with the key officers.

# Integration of sustainability-related performance in incentive schemes (GOV-3)

The GHG reduction initiatives of the parent ORLEN Group have been integrated into the management of the ORLEN Unipetrol Group through the management objectives (MBO) that are annually approved by ORLEN S.A. Quantitative objectives accounted for 70% in the variable annual fees for members of the Board of Directors, within which 5% weight was given to reduce the Total Recordable Rate (TRR) goal. In 2024, 10% of the variable component of the fees for the members of the Board of Directors relating to the qualitative goals were associated with incentives based on:

- implementing decarbonization measures contributing to GHG reduction by 2030 and reaching the net-zero goal for 2050,
- implementing projects derived from the 2030 Sustainable Development Strategy of the ORLEN Unipetrol Group.

Each member of the Board of Directors addresses specific qualitative objectives that determine the respective sustainability development activities. The ORLEN 2030 Strategy was the overarching document. In 2025, it was updated in a document entitled **ORLEN Strategy 2035**.  
The fees for the members of the Board of Directors at the ORLEN Unipetrol Group are determined by ORLEN S.A. The main components of the remuneration system for members of the Board of Directors include the fee for their service and a variable MBO fee based on monitoring the performance of the defined parameters against management goals.

# Statement on sustainability due diligence (GOV-4)

Complying with the standards of responsible business conduct is a basic aspect of our operations, and our procedures are in compliance with the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. These practices are designed to prevent negative impacts and ensure that appropriate measures are taken when such impacts emerge in connection with our activities, in particular in relation to employees, human rights, the environment, the fight against

corruption, and consumer protection. We also expect our business partners, companies in our value chain, and in other business relations to comply with these practices. The principles of responsible business conduct are reflected in many internal practices and procedures. Our essential policies governing these topics include the following documents: **Code of Ethics**, **Code of Conduct for Suppliers**, **Human Rights Protection Policy**, **Anti-corruption Policy**.



# Risk management and internal controls over sustainability reporting (GOV-5)

The risk management and internal control system relating to sustainability was applied in the DMA process held from November 2023 to March 2024. Its update was performed in the spring of 2025. We identified two risks related to E1 and G1. They were assessed using the same methodology as the system of business risks. The risk assessment approach used is described in the Financial Risk Management Policy. The ORLEN Unipetrol Group is gradually setting in place the process of the risk mitigation strategy relating to sustainability, including controls.








# Strategy, business model and value chain (SBM-1)

We specialise in the crude oil processing business and in the distribution and sale of fuel, petrochemical products, in particular plastics and fertilisers. We are a leader in both the Czech Republic and the broader Central European market. As of 31 December 2024, we had 5,690 employees (Czech Republic: 4,991, Hungary: 566, Slovakia: 116, Germany: 17). In 2024, our assets included refineries and production plants in Litvínov and Kralupy nad Vltavou, Paramo in Pardubice, Spolana in Neratovice, REMAQ in Otrokovice, and two research facilities in Litvínov and Brno. We operate a network of ORLEN

filling stations in the Czech Republic, Hungary, and Slovakia. In Germany, we distribute the products made in the Czech Republic for German-speaking countries. We offer a range of products and services for both the B2B (wholesale) and B2C (retail) segments. In the B2B segment, the main group of our customers is from the industry (automotive, food and beverages, chemical industry, packaging industry, air industry, etc.). Products and services for the retail market are essentially intended for direct fuel consumers. At our filling stations, we sell fuel, natural gas, electricity, hydrogen, non-fuel products and refreshments.



Fig. 2

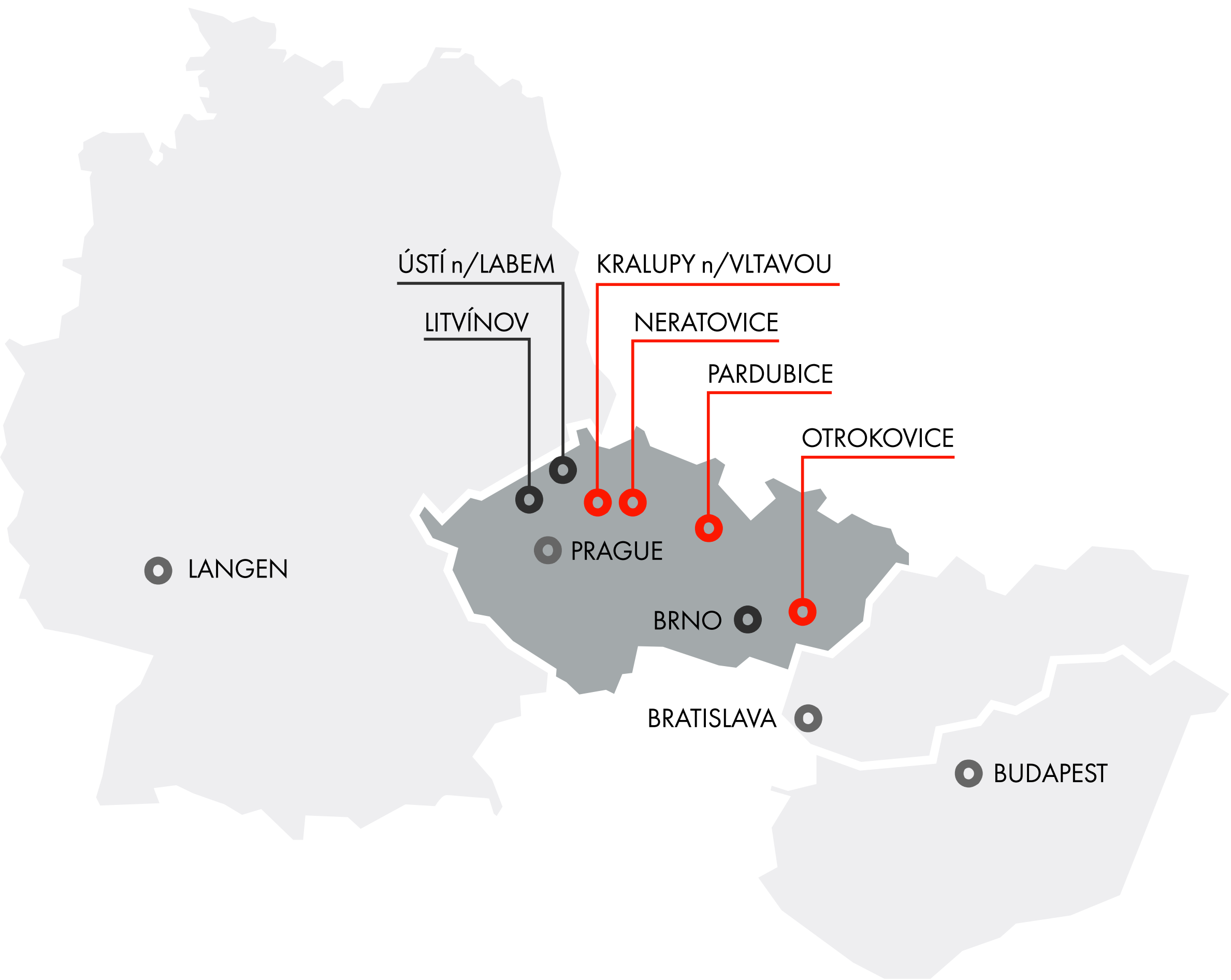
|  Production plants<br>and other companies |  Wholesale |  Retail |  Logistics |  Research and<br>development |  Sports |  CSR |                               |
|--|---|--|---|---|--|---|-------------------------------|
| ORLEN Unipetrol RPA<br>Litvínov, Kralupy   | SPOLANA<br>Neratovice   | ORLEN Unipetrol<br>Slovakia  | ORLEN filling stations,<br>Czechia  | PETROTRANS  | POLYMER INSTITUTE<br>Brno  | HC VERRA<br>LITVÍNŮV  | ORLEN UNIPETROL<br>FOUNDATION |
| PARAMO<br>Pardubice  | BUTADIEN<br>Kralupy   | ORLEN Unipetrol<br>Deutschland   | ORLEN filling stations,<br>Slovakia   | ORLEN Unipetrol<br>DOPRAVA  | ORLEN<br>UniCRE  |   |                               |
| REMAQ<br>Otrokovice  | ORLEN<br>PROJEKT  | ORLEN Unipetrol<br>Hungary   | ORLEN filling stations,<br>Hungary  |   |  |   |                               |

(as of 31 December 2024)



Fig. 3

| 6<br>production plants  | 4<br>commercial agencies  | 3<br>development sites   |
|---|---|--|
| <ul style="list-style-type: none"><li>• LITVÍNOV</li><li>• KRALUPY n/VLTAVOU</li><li>• NERATOVICE</li><li>• PARDUBICE</li><li>• BRNO</li><li>• OTROKOVICE</li></ul> | <ul style="list-style-type: none"><li>• PRAGUE</li><li>• LANGEN</li><li>• BRATISLAVA</li><li>• BUDAPEST</li></ul> | <ul style="list-style-type: none"><li>• LITVÍNOV</li><li>• ÚSTÍ n/LABEM</li><li>• BRNO</li></ul> |





**Fig. 4** **ORLEN Unipetrol Group – summary**





**Fig. 5**      **Main activities – segments**









**Fig. 6**                      **Refined products**

| Fuels  | Other refined products  | Asphalts and asphalt products  |
|--|---|--|
|  |   |  |
| <ul style="list-style-type: none"><li>• Petrol BA95</li><li>• Super Plus</li><li>• Additivated petrol</li><li>• Diesel oil</li><li>• Additivated diesel</li><li>• Arctic diesel</li><li>• Jet A-1</li><li>• HVO100</li></ul> | <ul style="list-style-type: none"><li>• Liquefied petroleum gases (LPG)</li><li>• Petrochemical raw materials</li><li>• Heavy fuel oil (HFO)</li><li>• Process oil for rubber softening</li><li>• Sulphur</li></ul> | <ul style="list-style-type: none"><li>• Asphalt emulsions</li><li>• Asphalt paints</li><li>• Asphalt suspensions</li><li>• Asphalt sealants</li><li>• Asphalt grouts</li><li>• Diluted asphalts</li><li>• Road asphalts (incl. modified asphalts)</li><li>• Construction-insulating asphalts</li></ul> |



**Fig. 7** Petrochemical products

| Monomers, aromatic compounds and others  | Polymers   | Agrochemistry products and other products  | Additive concentrates for plastics and compounds   |
|--|--|--|--|
|   |                                        |                     |   |
| <ul style="list-style-type: none"><li>◦ Ethylene for polymerization</li><li>◦ Propylene for polymerization</li><li>◦ Propylene FCC</li><li>◦ C4 fractions</li><li>◦ C10 fractions / non-hydrogenated</li><li>◦ Benzene</li><li>◦ Naphthalene concentrate</li><li>◦ Dicyclopentadiene</li></ul> | <ul style="list-style-type: none"><li>◦ Polyethylene LITEN®</li><li>◦ Polypropylene MOSTEN®</li><li>◦ ENVITEN®</li></ul> | <ul style="list-style-type: none"><li>◦ Ammonia</li><li>◦ Ammonia water</li><li>◦ CHEZACARB®</li></ul> | <ul style="list-style-type: none"><li>◦ M-COLOR®</li><li>◦ MAKROSTAB®</li><li>◦ MAKROFLAM®</li><li>◦ MAKROPLUS®</li><li>◦ MAKROCORR®</li><li>◦ THERMOBREAK®</li><li>◦ MAKROPORE®</li><li>◦ MAKROCLEAN®</li></ul> |

MOSTEN®

LITEN®

M-COLOR®





ENVITEN®

MAKROPLUS®

CHEZACARB®



**Fig. 8**                      **Retail products**

| Fuels  | Alternative fuels  | Non-fuel segment (convenience sales)  | Other  |
|--|--|---|--|
|   |    |    |   |
| <ul style="list-style-type: none"><li>◦ Additivated fuels<ul style="list-style-type: none"><li>Efecta 95</li><li>Efecta Diesel</li></ul></li><li>◦ Premium fuels<ul style="list-style-type: none"><li>Verva 100</li><li>Verva Diesel</li></ul></li></ul> | <ul style="list-style-type: none"><li>◦ CNG</li><li>◦ LPG</li><li>◦ HVO 100 Diesel</li><li>◦ Electricity</li><li>◦ Hydrogen</li><li>◦ AdBlue</li></ul> | <ul style="list-style-type: none"><li>◦ Stop Cafe<ul style="list-style-type: none"><li>Gastro concept</li></ul></li><li>◦ Private brands<ul style="list-style-type: none"><li>Energy drink</li><li>Ice-coffee</li><li>Mineral water</li><li>Smoothies</li></ul></li></ul> | <ul style="list-style-type: none"><li>◦ Fuel cards<ul style="list-style-type: none"><li>TANKARTA EASY</li><li>TANKARTA BUSINESS</li></ul></li><li>◦ Mobile apps<ul style="list-style-type: none"><li>ORLEN app</li><li>Mycí digi linka</li></ul></li></ul> |

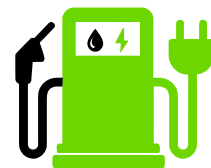


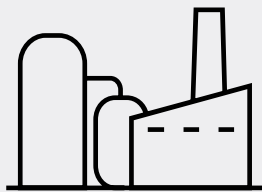
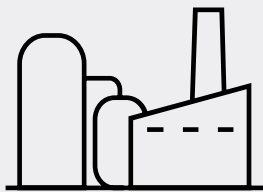
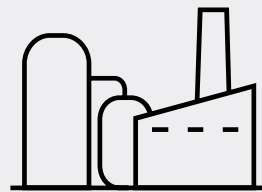
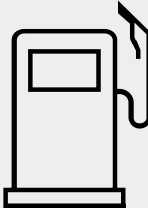


Fig. 9 ORLEN Unipetrol – financial results in 2024





**Fig. 10** **ORLEN Unipetrol – key investments**

| Heat recovery of flue gases at the Kralupy Refinery   | Investment projects during the turnaround at the Litvínov Refinery   | Production unit for dust-free mixtures  | Retail network development   |
|---|--|---|--|
| <ul style="list-style-type: none"><li>• CZK 500m</li><li>• Completion: 2025</li></ul>  | <ul style="list-style-type: none"><li>• CZK 3bn</li><li>• Completion: 2025</li></ul>  | <ul style="list-style-type: none"><li>• CZK 225m</li><li>• Completion: 2024</li></ul>  | <ul style="list-style-type: none"><li>• Modernisation of the Stop Cafe concept</li><li>• Installations of EV charge points</li><li>• Development of the ORLEN mobile app</li></ul>  |



**Sustainability Strategy 2025–2035**






The ORLEN Unipetrol Group follows the sustainability strategy of its parent company, ORLEN, which was revealed in December 2023. This document was updated and published under the name **ORLEN Sustainability Strategy 2025-2035**. It is a comprehensive framework governing our development and operations in line with sustainability principles. It addresses the most pressing current market and regulatory challenges, and is structured around five key pillars: **climate, environment, workforce, communities, and governance**.

**Fig. 11**      **Structure of ORLEN Group’s Sustainable Development Strategy for 2025-2035**

|  <b>Climate</b>   |  <b>Environment</b>   |  <b>Employees</b>  |  <b>Communities</b>   |  <b>Governance</b>   |
|--|---|---|--|---|
| <div>MITIGATING CLIMATE CHANGE</div> <div><div>1. Decarbonization</div><div>2. Energy transition</div><div>3. Adapting to climate change</div></div> | <div>ENVIRONMENTAL AND BIODIVERSITY PROTECTION</div> <div><div>4. Biodiversity protection</div><div>5. Water and wastewater management</div><div>6. Circular economy, pollution reduction</div></div> | <div>OCCUPATIONAL SAFETY AND WELLBEING</div> <div><div>7. Occupational health and safety</div><div>8. Process safety</div><div>9. Employee health</div><div>10. Wellbeing</div></div> | <div>RELATIONS WITH STAKEHOLDERS AND COMMUNITIES</div> <div><div>11. Engagement with local communities</div><div>12. Just Transition</div><div>13. Education to raise sustainability awareness</div></div> | <div>RESPONSIBLE GOVERNANCE</div> <div><div>14. Sustainable value chain</div><div>15. Cybersecurity</div><div>16. Respect for human rights</div><div>17. Diversity and inclusion</div><div>18. Ethics, compliance and anti-corruption</div></div> |



**Fig. 12**      **Selected ORLEN Group sustainability strategy goals until 2030**

|  <b>Climate</b>  |  <b>Environment</b>  |  <b>Employees</b>   |  <b>Communities</b>   |  <b>Governance</b>  |
|---|--|--|--|--|
| <p>MITIGATING CLIMATE CHANGE</p> <ul style="list-style-type: none"><li>• Meeting decarbonization strategy targets</li><li>• Near-zero methane emissions from extraction facilities and zero waste incineration</li><li>• Gradually phasing out electricity generation from coal</li></ul> | <p>ENVIRONMENTAL AND BIODIVERSITY PROTECTION</p> <ul style="list-style-type: none"><li>• Implementing the biodiversity action plan</li><li>• Introducing sustainable water and wastewater management</li><li>• Installed recycling capacity of 150 kt</li><li>• Optimising the pollution indicators for other than GHG</li></ul> | <p>OCCUPATIONAL SAFETY AND WELLBEING</p> <ul style="list-style-type: none"><li>• Occupational safety: TRIR&lt; 0.2</li><li>• Developing initiatives related to employee health and satisfaction</li><li>• Improving the employee benefits schemes</li><li>• Supporting employee development and respecting diversity</li></ul> | <p>RELATIONS WITH STAKEHOLDERS AND COMMUNITIES</p> <ul style="list-style-type: none"><li>• Just Transition Programme</li><li>• Continuous collaboration with local communities and addressing their needs</li><li>• Increasing the awareness of stakeholders about climate protection and sustainability</li></ul> | <p>RESPONSIBLE GOVERNANCE</p> <ul style="list-style-type: none"><li>• Ensuring unified standards with respect to human rights, ethics and anti-corruption throughout the entire value chain</li><li>• Due diligence process in respect of human rights and environmental protection</li><li>• Introducing a centralised model for cybersecurity management</li></ul> |



As part of the updated sustainability strategy, we have identified key topics that impact the long-term business sustainability, which are further reflected in the parent company’s strategic pillars. Such defined strategic priorities, derived from the updated corporate strategy with an outlook until 2025, are already reflected in specific implementation measures and projects across individual parts of the Group.

With respect to **climate**, we focus on decarbonization (net zero) and energy transition. The selected strategy direction is clearly in line with global trends of shifting from reliance on a single fuel source to generating electricity from a sustainable mix that strongly prioritises renewable energy sources (RES) and natural gas. One of our most significant commitments is to terminate electricity and heat generation from coal completely by 2030. We focus on adapting to and mitigating the effects of climate change. Introducing advanced biofuels is an essential activity related to decarbonization and supporting low- and zero-emission mobility in road and rail transport in Czechia. This strategy is in line with the EU Directive RED III and the Czech Ministry of Transport’s National Clean Mobility Plan.

The aims of **reducing emissions by 2030 and 2035** (with the year 2019 being the base year) as part of our path towards net zero by 2050 for the **ORLEN Group** are as follows:

- a 13% reduction in absolute GHG emissions (Scope 1 and 2) from Upstream & Supply and Downstream segments by 2030, and a 25% reduction by 2035 compared to 2019 levels,
- a 40% reduction in carbon intensity in the energy sector by 2030 and a 55% reduction by 2035,
- a 10% reduction in net carbon intensity (NCI) of energy products by 2030 and a 15% reduction by 2035.

Regarding **the environment**, we prioritise reducing the impact of our activities on the environment and preventing the loss of biological diversity. As a member of the ORLEN Group, we will participate in the plan for developing biodiversity protection. Sustainable water and wastewater management is another essential element in this respect. We focus on developing the circular economy and reducing pollution.

As for our **workforce**, we will continue to focus on reducing the accident frequency in the workplace and implementing consistent OHS and process safety standards. Another primary area of focus is supporting the physical and mental health and wellbeing of our employees. We are committed to continuing and expanding our portfolio of professional development programmes to support skills development. One of our main ambitions is to remain a leading employer within the Ústí Region and the entire Czech Republic.

**Communities** are essential due to the significant impact we have on the inhabitants in the areas where we operate. We will continue to develop our portfolio of CSR activities that support and engage local communities. We aim to develop a more structured approach to communities.

**Governance** integrates all areas together. Our governance-related initiatives include due diligence development, initiatives aimed at human rights, and environmental protection. Other governance goals include harmonising the standards for ethics, anti-corruption activities, and human rights, as well as implementing a centralised cybersecurity management model. We are committed to setting an example in change management and serving as a model for our corporate partners.

**The key sustainability areas at the ORLEN Unipetrol Group by 2030 are as follows:**

- reducing emissions,
- increasing the share of petrochemical products based on sustainable raw materials to 5%,
- continuously increasing the recycling capacity from the current 35 kt of plastic waste a year,
- consuming up to 10 kt of sustainable hydrogen (RFNBO) a year,
- introducing renewable energy sources, transforming energy by switching to natural gas,
- building EV charge points and reaching a 25% share in the Czech market,
- operating our facilities safely, raising the awareness among employees and contractors about risks.

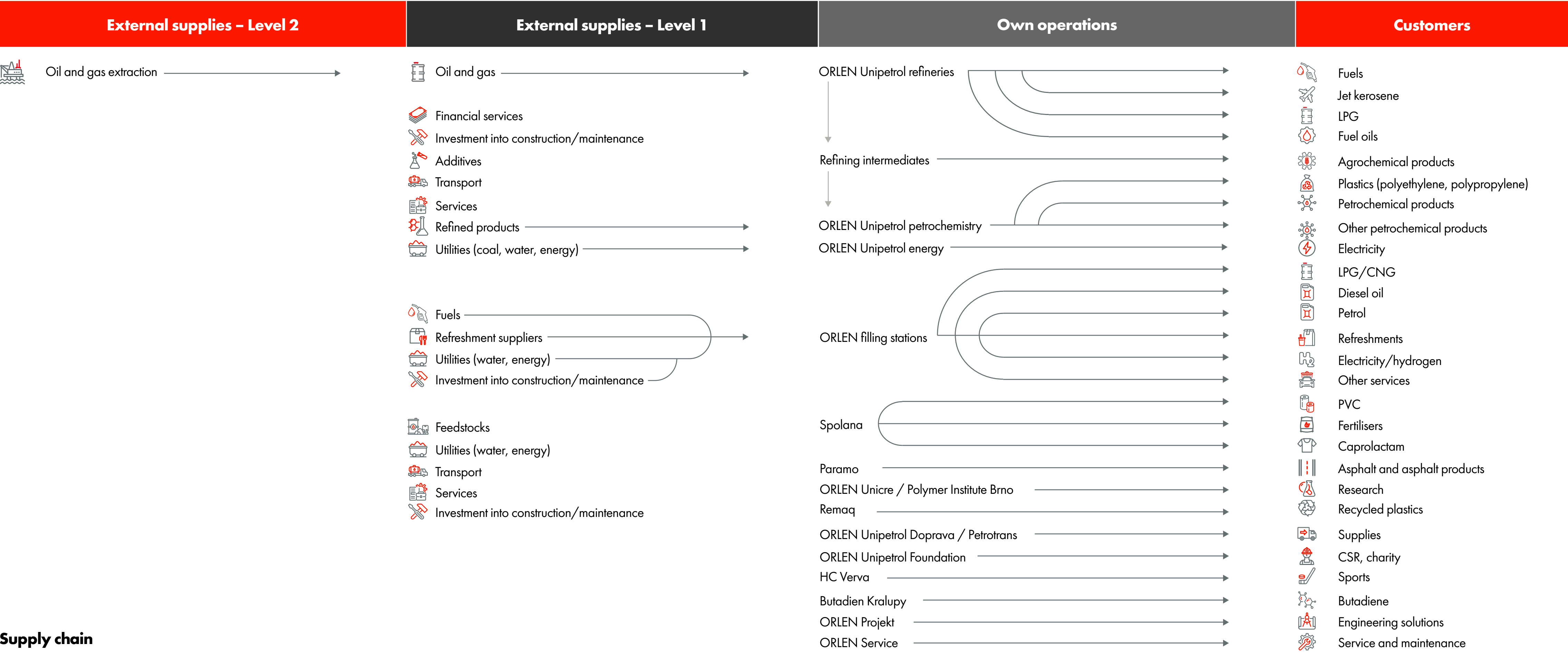
We aim to ensure the supply of inputs and the seamless operation of our industrial sites, as well as the subsequent sale of products. The main inputs in our production include crude oil, natural gas, energy, and chemical raw materials. Detailed information about the products and services offered is included in this chapter.



Value chain

The following picture shows our value chain

Fig. 13



Supply chain



# Interests and views of stakeholders (SBM-2)

The interests and views of our stakeholders matter to us and may influence our decisions regarding the future direction of our strategy or business model. Each stakeholder group plays a significant role in our Group’s development and operation. In 2023, we prepared a well-organised dialogue with our stakeholders. The survey was conducted online and through individual interviews with their nominated representatives. Stakeholders are individuals or groups that are affected by our Group’s activities and operations. Our dialogue with stakeholders provides us with insights into their positions, concerns, and expectations. The purpose was to gather their views and expectations regarding our company. The review process included an independent evaluation using a predefined points system to assess the impact on the ORLEN Unipetrol Group and the subsequent reflection in the double materiality assessment. That allowed us to align our priorities relating to sustainability, projects, and processes. In our interactions, we prefer integrity, transparency, mutual respect, and professionalism. Our commitment to fostering solid relationships is reflected in our communication strategy: We select an optimal frequency and suitable channels for each stakeholder group. To understand the interests and views of stakeholders, including the activities related to our strategy, as thoroughly as possible, we have defined a scope of entities, business segments, and business segment specifications. We understood our value chain by:

- identifying internal and external stakeholders, including their role in the value chain and their engagement,
- developing simplified value chain schemes to understand the general value chain setting,
- mapping the value chain, the business relation, the ESRS sector, business activities, dependency on resources, and the geographical area.

**Key stakeholders:**

- 100% shareholder: ORLEN S.A. (determines the strategy, a significant oil and gas supplier, ensures emission allowances)
- Oil and gas suppliers
- Production material suppliers
- Service suppliers
- Customers (wholesale)
- Retail customers and end consumers
- Employees
- Trade union organisations
- Local communities
- Non-governmental organisations
- Schools, science and research institutions
- Environmental organisations
- Local, regional, government, and European bodies
- Regulators
- Rating agencies
- Financial institutions
- Competitors
- Lessors of filling stations
- Industrial and consumer organisations
- Media



# Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)

During the DMA process, we identified 27 impacts, risks, and opportunities in accordance with the ESRS, including 14 related to the environment, 10 to the social sphere, and three to governance. This number includes two supplementary topics that we have added, which are not part of sustainability issues but are regarded as material issues in the context of ORLEN Unipetrol Group’s activities.

### Overview of our material topics

The following tables contain our material topics, which were identified during the DMA process, and assigned either a very high value (5) or a high value (4). We specify the topics to which the materiality applies within each ESRS standard. The tables also contain a brief description and information on whether the materiality concerns our own operations, suppliers, or customers, and the related time horizon (S – short-term, M – medium-term, L – long-term). With impacts, we also show whether they are positive or negative, current or potential. Detailed information about each topic is provided in individual chapters of this report: **Environmental information**, **Social information**, and **Company governance**.



**Table 1**                    **Material topics identified during the DMA process**

| ESRS topics                        | Subtopic                         | Name   | Impact/ risk/ opportunity | Current/ potential | Time horizon | Place in the value chain   |
|------------------------------------|----------------------------------|--|---------------------------|--------------------|--------------|----------------------------|
| <b>E1</b><br><b>Climate change</b> | <b>Mitigating climate change</b> | • Production of GHG emissions in own operations - Scope 1, at customers when using/processing our products and in the supply chain – Scope 3         | Negative impact           | Current            | S,M,L        | Own operations             |
|                                    |                                  | • <b>Risk of losing current business due to energy transformation in industry and decarbonization</b>  | Risk                      | Current            | M,L          | Own operations             |
|                                    |                                  | • Costs of decarbonization resulting in carbon neutrality  |                           |                    | S,M,L        | Own operations             |
|                                    |                                  | • Costs of transition from coal to gas   |                           |                    | M,L          | Own operations             |
|                                    |                                  | • Increased commodity prices due to the expanded coal tax regime, shutdown of current raw material deposits or unwillingness to finance new deposits |                           |                    | L            | Own operations + suppliers |
|                                    |                                  | • Costs of meeting more stringent requirements for renewable fuels   |                           |                    | M,L          | Own operations             |
|                                    |                                  | • Fines for a failure to meet goals defined by RED III and transposed into Czech legislation   |                           |                    | M,L          | Own operations             |
|                                    |                                  | • Regulatory actions increasing the costs of CO <sub>2</sub> EUA prices  |                           |                    | S,M,L        | Own operations             |
|                                    |                                  | • Lower demand for conventional fuels thanks to battery usage and hydrogen mobility  |                           |                    | L            | Own operations + customers |
|                                    |                                  | • Lower costs of buying emission allowances thanks to decarbonization  | Opportunity               | Current            | S,M,L        | Own operations             |
|                                    | <b>Energy</b>                    | • Production of GHG emissions, Scope 2, in own operations (purchased energy)   | Negative impact           | Current            | S,M,L        | Own operations + suppliers |
|                                    |                                  | • High energy consumption in own operations  | Negative impact           | Current            | S,M,L        | Own operations             |
|                                    |                                  | • Using more environmentally friendly energy sources   | Negative impact           | Current            | M            | Own operations + suppliers |
| <b>E2</b><br><b>Pollution</b>      | <b>Air pollution</b>             | • Air pollution with CRM substances  | Negative impact           | Current            | S,M,L        | Own operations             |
|                                    |                                  | • Emissions of suspended solids due to facility leakage – except for CRM substances  | Negative impact           | Potential          | S,M,L        | Own operations             |
|                                    |                                  | • Air pollution with other emissions than GHG - NO <sub>x</sub> , SO <sub>x</sub> , solid dust particles, VOC  | Negative impact           | Current            | S,M,L        | Own operations             |
|                                    |                                  | • Air pollution with other emissions than GHG at customers and suppliers   | Negative impact           | Current            | S,M,L        | Suppliers + customers      |
|                                    | <b>Water pollution</b>           | • Groundwater pollution due to old environmental burdens – applies to production sites   | Negative impact           | Potential          | S,M,L        | Own operations             |



**Table 1**      **Material topics identified during the DMA process**

| ESRS topics                             | Subtopic  | Name  | Impact/ risk/ opportunity | Current/ potential | Time horizon | Place in the value chain   |
|---|---|---|---------------------------|--------------------|--------------|----------------------------|
| E5<br>Resource use and circular economy | Resource inflows, including resource use  | <ul style="list-style-type: none"><li>• Circular economy, waste sorting and processing to recycled raw materials for petrochemistry and refineries</li></ul>  | Positive impact           | Potential          | M            | Own operations             |
|   | Resource outflows related to products and services  | <ul style="list-style-type: none"><li>• New business opportunities related to polymer products with long life</li></ul>                                       | Opportunity               | Current            | M,L          | Own operations + customers |
|   |   | <ul style="list-style-type: none"><li>• Mechanical and chemical recycling</li></ul>   | Positive impact           | Current            | S,M,L        | Own operations             |
| S1<br>Own workforce                     | Working conditions <ul style="list-style-type: none"><li>• Job stability</li><li>• Adequate wages</li><li>• Health and safety</li></ul> | <ul style="list-style-type: none"><li>• Stable employment in regions</li></ul>  | Positive impact           | Current            | S,M,L        | Own operations             |
|   |   | <ul style="list-style-type: none"><li>• Wage level compared to labour market</li></ul>  | Positive impact           | Current            | S,M,L        | Own operations             |
|   |   | <ul style="list-style-type: none"><li>• Employee injuries with incapacity for work</li></ul>  | Negative impact           | Current            | S,M,L        | Own operations             |
|   | Equal treatment and opportunities for all   |   |                           |                    |              |                            |
|   | <ul style="list-style-type: none"><li>• Gender equality and equal pay for work of equal value</li></ul>                                 | <ul style="list-style-type: none"><li>• Insufficient representation of women in senior managerial positions</li></ul>   | Negative impact           | Current            | M            | Own operations             |
| S2<br>Workers in the value chain        | Working conditions <ul style="list-style-type: none"><li>• Health and safety</li></ul>  | <ul style="list-style-type: none"><li>• Injuries with working incapacity of supplier’s employees</li></ul>  | Negative impact           | Current            | S,M,L        | Own operations + suppliers |
|   |   |   |                           |                    |              |                            |
| S3<br>Affected communities              | Economic, social, and cultural rights of communities <ul style="list-style-type: none"><li>• Soil-related impacts</li></ul>             | <ul style="list-style-type: none"><li>• Negative impacts of ORLEN Unipetrol operations on neighbouring municipalities – noise, luminous smog, smell</li></ul> | Negative impact           | Current            | S,M,L        | Own operations             |
|   | Supplementary topic: community support  | <ul style="list-style-type: none"><li>• CSR projects – ORLEN Unipetrol Foundation, incl. support of technical education</li></ul>                             | Positive impact           | Current            | S,M,L        | Own operations             |
| S4<br>Consumers and end- users          | Social integration of consumers and/ or end- users <ul style="list-style-type: none"><li>• Access to products and services</li></ul>    | <ul style="list-style-type: none"><li>• We ensure non-stop availability of goods and services</li><li>• Installation of EV charge points</li></ul>            | Positive impact           | Current            | S,M,L        | Own operations + customers |
|   |   |   | Opportunity               | Current            | S,M,L        | Own operations + customers |



**Table 1**                    **Material topics identified during the DMA process**

| ESRS topics         | Subtopic  | Name  | Impact/ risk/ opportunity | Current/ potential | Time horizon | Place in the value chain               |
|---------------------|---|---|---------------------------|--------------------|--------------|--|
| G1 Business conduct | Management of relationships with suppliers, including payment practices | • Effective system of supplier selection and evaluation | Positive impact           | Current            | S,M,L        | Own operations + suppliers             |
|                     | Corruption and bribery  |   |                           |                    |              |  |
|                     | • Incidents   | • Procedures in place to prevent and detect corruption  | Positive impact           | Current            | S,M,L        | Own operations + suppliers + customers |
|                     | Supplementary topic: cybersecurity                                      | • Risk associated with fraudulent cybersecurity         | Risk                      | Current            | S,M          | Own operations                         |

Description of the process to identify and assess material impacts, risks and opportunities (IRO-1)

We launched the double materiality assessment (“DMA”) process in November 2023. We completed it in March 2024, using a methodology published by EFRAG and under the supervision of internal coordinators and external advisors. Its update was performed in the spring of 2025. The DMA was applied across the ORLEN Unipetrol Group, while some impacts, risks, and opportunities were specific only for certain entities or business segments within the Group.

The DMA encompassed the entire value chain, from suppliers to customers. However, the assessment of our partners’ ESG performance was based primarily on data, surveys, and other substitute indicators due to the limited information available from our partners in the value chain.

The main assessment was performed at ORLEN Unipetrol RPA, whose scope and share in the consolidation unit represent a clear majority of material topics of the ORLEN Unipetrol Group.

The Board of Directors was informed about the results of material impacts, risks, and opportunities in April 2024. The process of identifying and evaluating impacts, risks, and opportunities based on the CSRD & ESRS methodology was approved. Everything is based on the risk management process of the ORLEN Unipetrol Group. The result has not yet been reintegrated into the overall risk management process and used to assess the general risk profile and risk management process at the ORLEN Unipetrol Group.

The potential impacts, risks, and opportunities were assessed in three time horizons: a short-term horizon (including the current year and the following year), a medium-term horizon (from the end of the short-term period until five years), and a long-term horizon (more than five years).



**Description of the DMA process:**

**Part 1: Understanding**

**Purpose: Understanding the business, value chain, and related activities**

**Understanding the business:**

- defining the scope of entities that should be included in the sustainability report, the reporting period, defined business segments of each entity, and business segment specification for DMA purposes,
- describing the crucial business relationships and partnerships, including the business partner’s business segment and type of relationship,
- describing the dependence on resources for each business segment,
- defining time horizons for the purpose of the DMA and sustainability statement,
- creating a framework for classifying the information used to assess impacts, risks, and opportunities.

**Understanding the value chain:**

- identifying internal and external stakeholders, including their role in the value chain, their engagement or consultations related to the DMA and the purpose of engagement,
- developing simplified value chain schemes to understand the general value chain setting,
- mapping the value chain, including the position in the value chain, business relationships, the ESRS sector, business activities, dependency on resources, and the geographical area.

**Description of methodologies and assumptions applied in the understanding phase:**

- a list of sectors and subsectors under the ESRS,
- research work on comparable companies in the oil and gas industry performed to identify the relevant matters of comparable companies,
- assessing the DMA process at the parent company ORLEN to understand the methodology and alignment,
- assessing global sustainability reports of the parent company ORLEN,
- a dialogue with stakeholders taking place in 2023,
- the value chain mapping was based on the data on sales and purchases:
  - supplier mapping was based on the 59 most significant suppliers representing 92% of the total purchasing budget,
  - customer mapping was based on the 61 most significant customers representing 73% of the total turnover.

**Part 2: Identification**

**Purpose: Identification of relevant impacts, risks, and opportunities (IRO)**

1. Making a long IRO list
2. Identifying specific IROs at the ORLEN Unipetrol Group

The identification phase resulted in a closer selection of IROs that were considered as relevant for the assessment.

**Part 3: Assessment**

**Purpose: Assessment of impact and financial materiality**

IROs were assessed within a group of internal experts responsible for a specific topic. Description of applied methodologies and assumptions:

1. Defining the evaluation criteria and scoring mechanism,
2. Assessing the impact materiality,
3. Assessing the financial materiality,
4. Setting materiality thresholds,
5. Final setting.

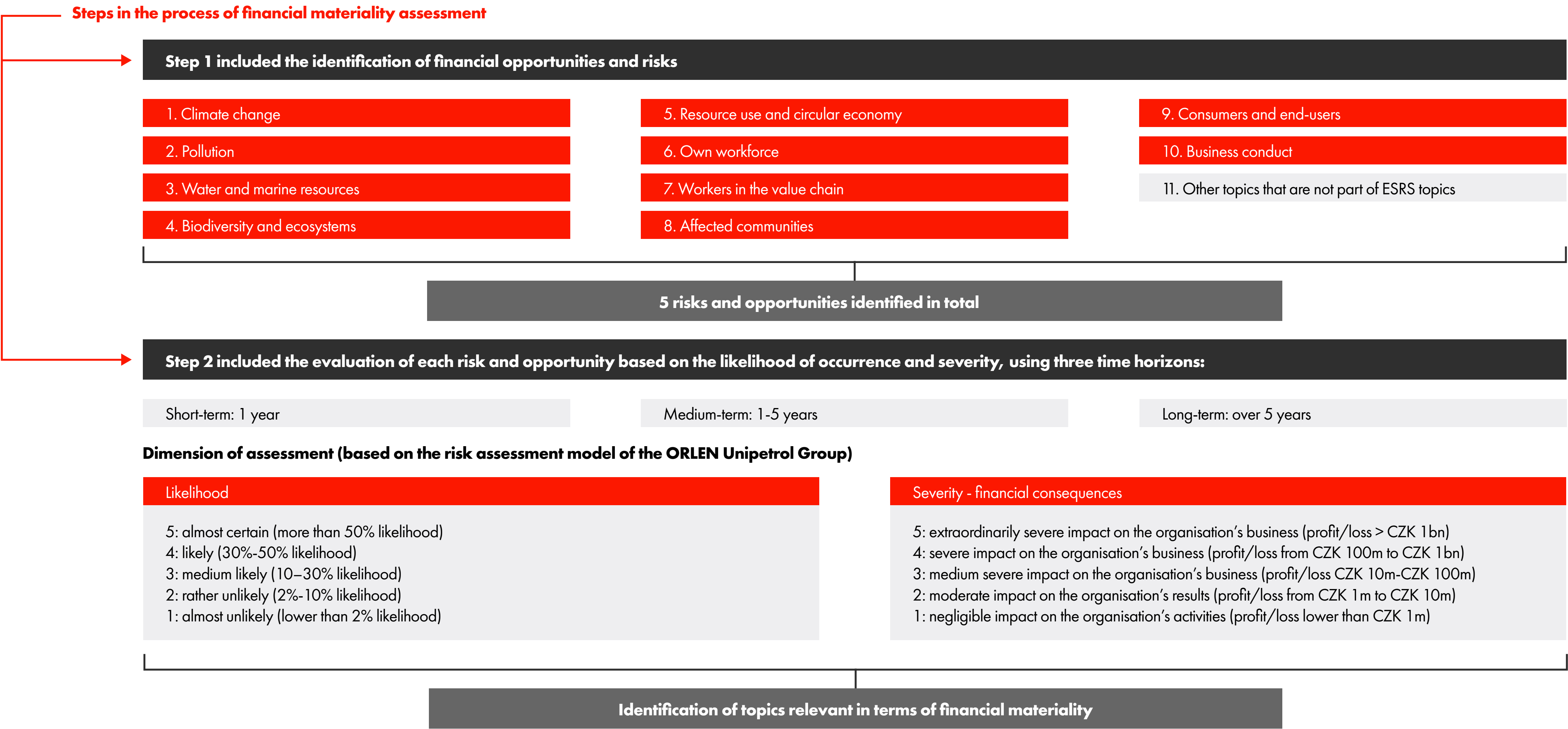
**Part 4: Decision**

**Purpose: Determining significant topics**

1. Determining material IROs
2. Determining material ESRS topics



**Fig. 14**      **Methodology – financial materiality assessment**



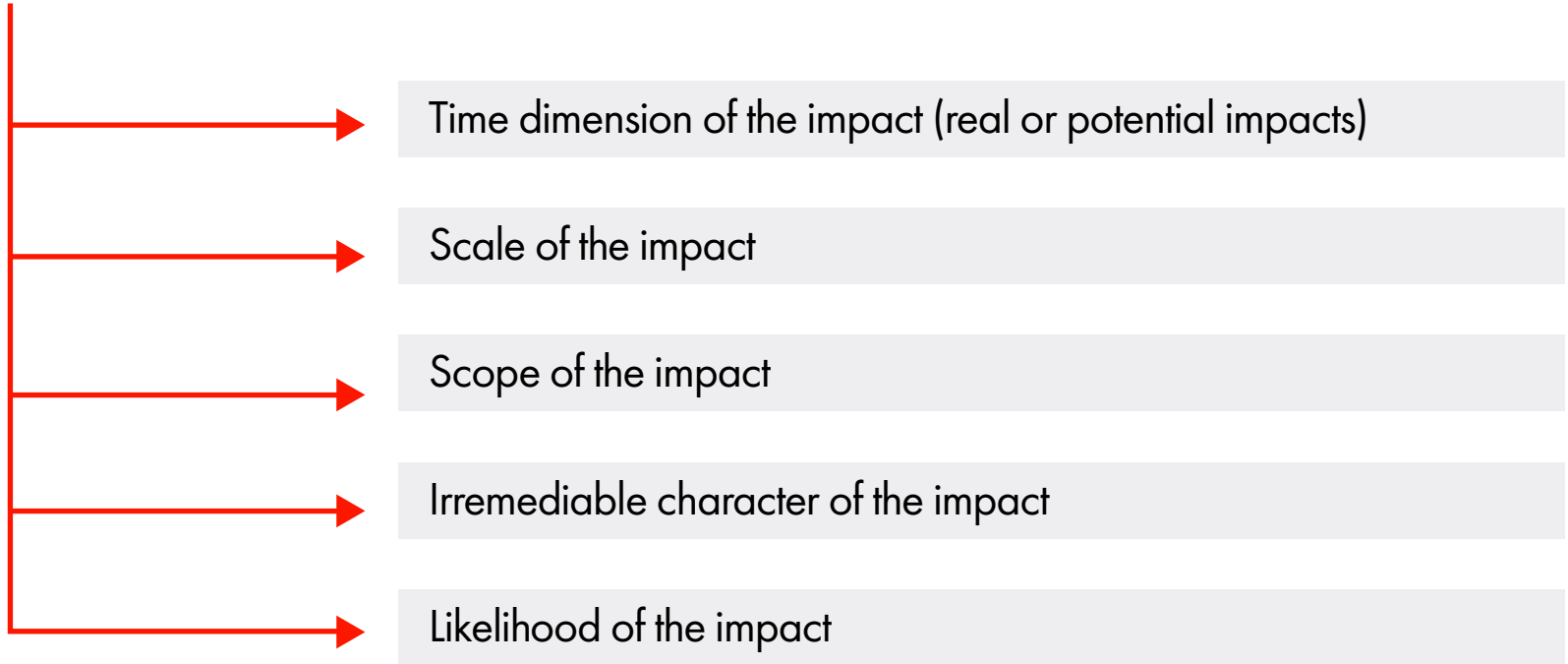


**Fig. 15**                      **Methodology – impact materiality assessment (from the organisation’s perspective)**

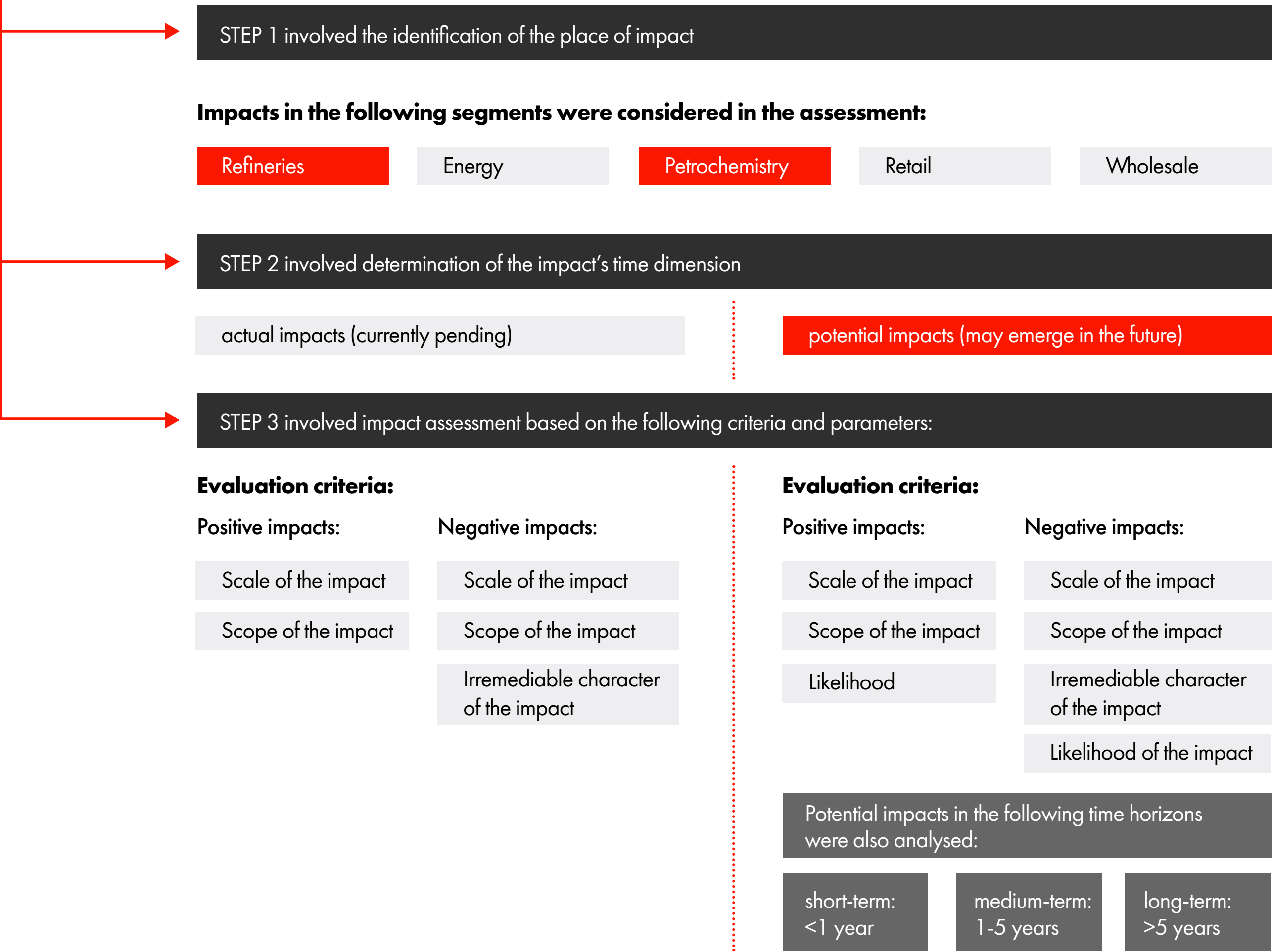
**The following impacts were considered in the assessment:**



**The criteria applied to impact assessment included:**



**Steps in the impact materiality assessment process**





Disclosure requirements in ESRS covered by the undertaking’s sustainability statements (IRO-2)

Table 2

| ESRS                      | Disclosure   | Page number in the report | ESRS   | Disclosure  | Page number in the report |
|---------------------------|--|---------------------------|--|---|---------------------------|
| ESRS 2                    | BP-1 General basis for preparation   | 7                         | ESRS E1<br>Climate change                    | E1-7 GHG removals and GHG mitigation projects   | 43                        |
|                           | BP-2 Presentation of disclosures   | 8                         |  | E1-8 Internal carbon pricing  | 43                        |
|                           | GOV-1 The role of the administrative, management and supervisory bodies                                    | 9                         |  | E1-9 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities    | 44                        |
|                           | GOV-2 Information provided to the administrative, management and supervisory bodies                        | 10                        |  |   |                           |
|                           | GOV-3 Integration of sustainability-related performance in incentive schemes                               | 10                        | ESRS E2<br>Pollution                         | E2, IRO-1 Description of the process to identify and assess material pollution-related impacts, risks and opportunities       | 44                        |
|                           | GOV-4 Statement on due diligence   | 10                        |  | E2-1 Policies related to pollution  | 45                        |
|                           | GOV-5 Risk management and internal controls  | 11                        |  | E2-2 Actions and resources related to pollution   | 45                        |
|                           | SBM-1 Strategy, business model and value chain   | 11                        |  | E2-3 Targets related to pollution   | 45                        |
|                           | SBM-2 Interests and views of stakeholders  | 25                        |  | E2-4 Pollution of air, water and soil   | 46                        |
|                           | SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model     | 26                        |  | E2-5 Substances of concern and substances of very high concern  | 48                        |
| ESRS E1<br>Climate change | IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities        | 29                        |  | E2-6 Anticipated financial effects from pollution-related impacts, risks and opportunities                                    | 49                        |
|                           | IRO-2 Disclosure requirements in ESRS covered by the sustainability statement                              | 33                        | ESRS E5<br>Resource use and circular economy | E5, IRO-1 Description of the process to identify and assess material resource use and circular economy-related impacts, risks | 50                        |
|                           | E1-1 Transition plan for climate change mitigation   | 37                        |  | E5-1 Policies related to resource use and circular economy  | 51                        |
|                           | E1, IRO-1 Impacts, risks and opportunities   | 36                        |  | E5-2 Actions and resources related to resource use and circular economy   | 51                        |
|                           | E1, SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model | 36                        |  | E5-3 Targets related to resource use and circular economy   | 52                        |
|                           | E1-2 Policies related to climate change mitigation and adaptation  | 37                        |  | E5-4 Resource inflows   | 52                        |
|                           | E1-3 Actions and resources in relation to climate change policies  | 39                        |  | E5-5 Resource outflows  | 52                        |
|                           | E1-4 Targets related to climate change mitigation and adaptation   | 41                        |  |   |                           |
|                           | E1-5 Energy consumption  | 41                        |  |   |                           |
|                           | E1-6 GHG emissions   | 42                        |  |   |                           |



| ESRS  | Disclosure  | Page number in the report |
|---|---|---------------------------|
| <b>ESRS S1<br/>Own<br/>workforce</b>                  | S1, SBM-2 Interests and views of stakeholders   | 55                        |
|   | S1, SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model                            | 56                        |
|   | S1-1 Policies related to own workforce  | 58                        |
|   | S1-2 Processes for engaging with own workers and workers' representatives about impacts   | 59                        |
|   | S1-3 Processes to remediate negative impacts and channels for own workers to raise concerns   | 59                        |
|   | S1-4 Taking action on material impacts, risks and opportunities   | 60                        |
|   | S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | 61                        |
|   | S1-6 Characteristics of the undertaking's employees   | 61                        |
|   | S1-8 Collective bargaining coverage and social dialogue   | 62                        |
|   | S1-9 Diversity metrics  | 62                        |
|   | S1-10 Adequate wages  | 63                        |
|   | S1-11 Social protection   | 63                        |
|   | S1-12 Persons with disabilities   | 63                        |
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# 02

## ENVIRONMENTAL INFORMATION

Climate change  
Pollution  
Resource use and circular economy





# Climate change (E1)

## Integration of sustainability-related performance in incentive schemes (GOV-3)

This information is described in the chapter [Integration of sustainability-related performance in incentive schemes \(GOV-3\)](#).

## Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)

As part of the double materiality analysis related to climate change, we have identified the following topics in individual categories:

Table 3

| Subtopic                  | Name   | Impact/ risk/ opportunity | Current/ potential | Time horizon | Place in the value chain   |
|---------------------------|--|---------------------------|--------------------|--------------|----------------------------|
| Mitigating climate change | • Production of GHG emissions in own operations - Scope 1, at customers when using/processing our products and in the supply chain – Scope 3         | Negative impact           | Current            | S,M,L        | Own operations             |
|                           | • <b>Risk of losing current business due to energy transformation in industry and decarbonization</b>  | Risk                      | Current            | M,L          | Own operations             |
|                           | • Costs of decarbonization resulting in carbon neutrality  |                           |                    | S,M,L        | Own operations             |
|                           | • Costs of transition from coal to gas   |                           |                    | M,L          | Own operations             |
|                           | • Increased commodity prices due to the expanded coal tax regime, shutdown of current raw material deposits or unwillingness to finance new deposits |                           |                    | L            | Own operations + suppliers |
|                           | • Costs of meeting more stringent requirements for renewable fuels   |                           |                    | M,L          | Own operations             |
|                           | • Fines for a failure to meet goals defined by RED III and transposed into Czech legislation   |                           |                    | M,L          | Own operations             |
|                           | • Regulatory actions increasing the costs of CO <sub>2</sub> EUA prices  |                           |                    | S,M,L        | Own operations             |
|                           | • Lower demand for conventional fuels thanks to battery usage and hydrogen mobility  |                           |                    | L            | Own operations + customers |
| Energy                    | • Lower costs of buying emission allowances thanks to decarbonization  | Opportunity               | Current            | S,M,L        | Own operations             |
|                           | • Production of GHG emissions, Scope 2, in own operations (purchased energy)   | Negative impact           | Current            | S,M,L        | Own operations + suppliers |
|                           | • High energy consumption in own operations  | Negative impact           | Current            | S,M,L        | Own operations             |
|                           | • Using more environmentally friendly energy sources   | Positive impact           | Current            | M            | Own operations + suppliers |



The world is undergoing substantial changes, having a structural impact on the refining and petrochemical industry. They include the slowing pace of growth in demand for oil products, the growing role of alternative materials with an emphasis on the circular economy, competitive renewable energy sources, environmental issues, and consumer megatrends. As a member of the ORLEN Group, which has ambitions to become a leader in sustainability transition in Central Europe, ORLEN Unipetrol will contribute to the strategic development in the following areas:

- operational excellence-improved efficiency in production assets and optimisation of wholesale policies according to the future market development,
- circular economy with an emphasis on chemical recycling,
- expanding the retail network in the local market and abroad,
- emphasising the fuel quality and high-quality product offer,
- replacing a coal-fired heating plant with a gas-fired plant,
- investing in research, development, and innovations,
- consumption of renewable hydrogen (RFNBO),
- permanent reduction of the carbon footprint of our products.

## Transition plan for climate change mitigation (E1-1)

In 2024, the ORLEN Unipetrol Group did not have a detailed transition plan for climate change mitigation yet. We will work on preparing this plan in 2025.

## Policies related to climate change mitigation and adaptation (E1-2)

### The Group’s environmental policy

Environmental protection is our responsibility and a matter of common interest.

#### **Our commitments:**

- complying with national, European, and international standards while minimising the impact of our activities on the environment. In our activities, we are committed to fully complying with all applicable laws and regulations related to environmental protection. We regularly monitor trends and changes in legislation and adapt our activities to new requirements, while applying best practices to ensure the highest environmental protection standards,

- setting environmental objectives for our activities. We are committed to developing our business activities in a manner that aligns with environmental objectives. These objectives include mitigating and adapting to climate change, using natural resources (including water) sustainably, implementing the circular economy, preventing pollution, and protecting biodiversity,
- planning investment projects with regard to their environmental impact, including biodiversity. Subsequently, we implement these projects in a way that reduces this impact reasonably,
- focusing on innovation and developing new technologies that may have a positive impact on the environment,
- continuously perfecting all business areas and environmental protection management systems, and introducing sustainable procedures and practices,



- performing the planned activities to reach the environmental objectives set for the company, and monitoring their progress,
- conducting studies and surveys and implementing environmental programmes. Expanding process digitalization in business segments to improve the monitoring and reduce the impact on the environment,
- requiring compliance with environmental regulations from our suppliers, and providing support when reducing their impact on the environment and climate,
- raising awareness and effectively implementing the environmental policy assumptions, also through educational activities and employee training, with the aim of supporting environmentally friendly behaviour and activities and promoting the idea of sustainable development in the local area.

**Our activities are governed by principles that aim to:**

- reduce GHG emissions by increasing energy efficiency and developing renewable energy sources. We declare that we will achieve the adopted objectives to reduce CO<sub>2</sub> emissions and become carbon-neutral by 2050,
- support practices for a rational and effective management of natural resources and strive for the circular economy. That is expected to be achieved through efforts to minimise waste production, increase the use of bi-products and recycled materials, and through product and waste recycling,
- reduce the consumption of resources, including energy and water, and maximise the use of renewable energy sources,
- increase the efficiency of the management of water resources and improve wastewater management, including, without limitation, closing water cycles and reusing wastewater, as well as protect and improve water ecosystems,
- prevent and control pollution by reducing pollutant emissions into the air, water, or soil,
- protect, maintain, or restore biodiversity and ecosystems.

**The Integrated Management System Policy** defines commitments of ORLEN Unipetrol Group companies towards their own employees, customers, and other stakeholders with respect to the management of product and service quality, safety and health protection, environmental protection, and energy management.

We have in place certified quality management systems (QMS), environmental management systems (EMS), and health and safety management systems (HSMS) as a guarantee of a systematic approach to meeting the customers' needs, ensuring product and service quality, as well as environmental protection and occupational health and safety. Most of our companies have implemented a certified energy management system (EnMS), thus declaring their commitment to optimising energy use and meeting the legislative requirements of the Energy Management Act.

The above management systems are certified under international standards ISO 9001, ISO 14001, ISO 45001 and ISO 50001. In May and June 2022, a re-certification audit of QMS, EMS, HSMS, and EnMS management systems took place at ORLEN Unipetrol, ORLEN Unipetrol RPA (including branches BENZINA and POLYMER INSTITUTE BRNO), ORLEN Unipetrol Doprava, and PETROTRANS. The certification organisation, LRQA Czech Republic, confirmed compliance with system standards and issued a certificate to all the above companies for another three years, i.e., until 2025, when another re-certification will be held.

In May 2024, a re-certification audit related to QMS, EMS, SMS, and EnMS was held at SPOLANA. The scope of the certification applied to the production of suspension polyvinylchloride, stabilised vinyl chloride, hydrochloric acid, caprolactam, sulphuric acid, ammonium sulphate. The company received a certificate for another three-year period, valid until 28 June 2027. The audit was carried out by the certification company LRQA Česká republika s.r.o. (one certification company was used across the entire capital group ORLEN Unipetrol a.s.).

In June 2024, PARAMO underwent a surveillance audit conducted by LRQA Czech Republic, which included all three systems (EMS, HSMS, and QMS).

ORLEN Unipetrol RPA has a certified sustainability system for the production of motor fuels with biocomponents (ISCC). The most recent audit, which verified compliance with system requirements, was conducted by TÜV SÜD Czech in December 2024. The company has had a certified sustainability system for the production of monomers and plastics from sustainable raw materials (ISCC PLUS) since November 2021. The system was re-certified in October 2024.

ORLEN Unipetrol Doprava has implemented a system of safety and quality assessment for logistics service providers (SQAS).



## Actions and resources in relation to climate change policies (E1-3)

In 2024, we implemented investment projects worth CZK 281 million in support of environmental protection.

The most significant investment at ORLEN Unipetrol RPA, totalling CZK 7 million, involved a new CO<sub>2</sub> flow measurement project on the cold chimney stack of the partial oxidation unit (POX). Preparations for converting two boilers at the T700 heating plant into gas-fired boilers have a significantly positive environmental impact. We implemented several other actions that have a positive impact on the environment as part of our operational expenses for facility maintenance.

Paramo Pardubice implemented investment projects related to environmental protection in the total amount of CZK 74.84 million. The most significant projects include the K2 boiler replacement, energy savings after optimising the steam distribution system, EPS and gas detection, and HVO100 filling.

Investments at Spolana totalled CZK 70 million. The most significant investment involved optimising the use of air for oxychlorination of a new filling point for dispatching sulphuric acid and the renovation of cooling systems.

At ORLEN filling stations, we implemented environmental projects worth CZK 129.1 million. The investment focused primarily on renovating filling station sewerage systems, installing new car wash cleaners, implementing a general overhaul of biological wastewater treatment plants, replacing emergency collectors, and modifying the dewatering system of secured water management areas.

As for saving primary sources of raw materials and energy, the ORLEN Unipetrol Group applies sustainable development principles and focuses its primary strategy on innovative approaches resulting in optimised energy and material inputs. It also promotes continuous improvements of the environmental performance and increased energy efficiency. As part of its decarbonization efforts, ORLEN Unipetrol RPA has developed a strategy to reduce GHG emissions. We committed ourselves to becoming carbon neutral by 2050. One of the essential steps involves continuously reducing energy losses—a programme entitled “Increasing Reliability and Efficiency of Steam Condensate Systems”. We constantly monitor steam leakages at all production units and immediately initiate their elimination. Monitoring of energy leakages involves the replacement of non-functional condensate outlets, removal of steam leaks, and replacement of damaged insulation, as well as the addition of missing insulation. In this programme, we also monitor leaks through piping valves.

We constantly increase the emphasis on introducing energy-efficient and innovative solutions to optimise the energy consumption. We perform a clear majority of these activities through investment projects. We are also gradually launching digitalization, which will contribute to optimising the use of energy. In 2024, we completely refurbished the vacuum distillation unit, including the installation of the CombustionONE system, which is already a standard for optimising combustion processes at suitable furnaces. Besides installing the system for combustion optimisation, we also replaced a vacuum column. The refurbishment of this unit will help increase its energy efficiency.

We also continue to develop Advanced Process Control methods (APC). In 2024, we installed the complete APC system at the T700 heating plant, which will significantly contribute to optimising operations and saving primary raw materials, in particular lignite. The APC system at T700 will focus on the combustion process and its optimisation. As part of an APC upgrade, we are implementing PWO (plantwide optimiser) projects to link individual APC systems.

We utilise the Visual MESA tool to optimise energy consumption and usage. This system enables us to utilise all energy sources across the entire Chempark Záluží site, from energy generation at the T700 plant to its application in all segments, including the refinery, petrochemistry, and agrochemistry. The Visual MESA tool is used on a daily basis. The created model evaluates all operated technologies as a whole and seeks optimal values throughout the entire site, which is highly beneficial. It also allows for identifying and evaluating other optimisation suggestions. At individual units, we emphasise their capacity utilisation, which has a positive impact on the production's energy efficiency. In this respect, we continue projects focused on increasing the facility's reliability.

Regarding innovative projects, we address issues related to utilising low-energy/waste heat. In this respect, the project entitled **“Using heat from flue gas at Kralupy Refinery”** is the largest implemented project. It is expected to be completed in 2025, at which point this unique unit will be put into operation.



As part of our energy efficiency efforts, we are considering replacing conventional reducers with turning reducers and utilising the heat from flue gases and other heat sources. In terms of utilising waste heat, we are verifying and exploring the use of an ORC (Organic Rankine Cycle) to generate electricity from waste heat. In cooperation with an external company, we are involved in researching the installation of an ORC unit on the steam cracker, which helps us decide on the suitability of installing these technologies, achieving full-fledged performance and allowing us to use waste heat from big streams.

We regularly monitor both energy consumption and costs in daily and monthly reports. In 2024, we replaced non-functional steam traps in our heat management system. We also renovated the water input temperature regulation at heat exchanger stations in some buildings.

In 2024, we launched the renovation of the site's public lighting system. We replaced sodium discharge lamps with LED lights. This measure reduced electricity consumption.

In 2024, we launched talks and a survey with the option to implement a suitable energy optimisation tool at filling stations. In energy management, we launched a pilot operation of a task manager to evaluate and monitor deviations in energy consumption. Electricity use at filling stations is also optimised through the implementation of low-energy appliances and technologies (LED). **In 2024, the measures adopted helped reduce electricity consumption by 2% compared to 2023.**

In 2023, we launched the project of photovoltaic installations (PVI) at filling stations. In 2024, the first installation was made at the filling station in Slaná u Semil. We are also implementing a project of mounting additional PVIs using the funding from the RES+ subsidy fund. Other PVI projects were assessed in connection with the e-mobility infrastructure until 2035, which counts on using the generated electricity to charge e-cars.

Our Polymer Institute Brno branch regularly monitors energy consumption. We are reducing electricity consumption by replacing old lights with new, low-energy ones (utilising LED technology).

Still, we saw an increase in total electricity consumption in 2024 by 53 MWh compared to 2023, which was due to a higher consumption in research (by 41%/22.2 MWh) and production (by 9.1%/94 MWh). We managed to achieve significant savings in natural gas consumption. The total consumption decreased to 86.4% compared to 2023 (savings: 1,443 m<sup>3</sup>) and even to 76.6% compared to 2022 (savings: 2,800 m<sup>3</sup>).

At Paramo, we regularly reduce the consumption of steam used to heat products and filling routes (using heat from our own steam at the incinerator for asphalt operations, electric heating for irregular use for the filling route). We optimise the length of steam piping routes, which reduces losses in the piping system, and install heat insulation at selected tanks. We also pay major attention to the project of zero tolerance for steam leakages and lacking or damaged insulation, as well as non-functioning condensation sets. We installed new feed pumps to reduce energy consumption. To ensure reliable and safe electricity distribution, we renovated both high- and low-voltage substations. We continue to replace discharge tube lights with LED technology, offering a significant potential for electricity savings. Equally, we save heat by installing a new steam boiler in our energy operations and constructing new steam pipes in the selective refining and paraffin refining department within the oil production operations.

It was decided that the uneconomic PVC and caprolactam operations at Spolana would be terminated in 2025. The essential and ongoing project of modernising sulphuric acid operations continued until the end of 2024, and the production of sulphuric acid was resumed afterwards. We made steps to optimise production units to introduce comprehensive changes in energy consumption. For optimal use of the generated heat, we have started preparing a steam turbine project, which is expected to be put into operation in 2027.

In energy management, ORLEN Unipetrol Doprava focuses primarily on optimising the consumption of fuel, electricity, and technological and heating steam. In 2024, we continued to replace lights at the lighting towers with LEDs, which was positively reflected in lower electricity consumption.

We continued to upgrade the locomotive fleet. In 2024 and at the beginning of 2025, the company included four more Siemens Vectron MS locomotives in its fleet (the total number is 11). The locomotives have electric motors that also allow for measuring recuperation. **In 2024, the locomotives recuperated 12.06% more MWh of electricity year on year from the total traction energy taken.** By purchasing electric locomotives, we contribute to achieving our strategic aim of decarbonizing operations, reducing energy consumption, and maintaining competitiveness in rail transport services. At the end of 2024, we electrified the railway siding at the Litvínov site. We took over the use of the electric traction mains over a part of the railway siding, which connects the plant and the state railway network.



## Targets related to climate change mitigation and adaptation (E1-4)

Reducing CO<sub>2</sub> emissions, Scope 1 and 2, by 25% by 2025 compared to the reference year 2019 is one of the primary strategic aims of the ORLEN Group with respect to sustainability. We will make a climate risk analysis in the second half of 2025.

## Energy consumption and mix (E1-5)

Table 4

| Subtopic   | Data for the reporting period, value in MWh |
|--|---|
| 1) Consumption of fuel from coal and coal products (MWh)   | 3,039,952                                   |
| 2) Consumption of fuel from oil and oil products (MWh)   | 5,982,589                                   |
| 3) Consumption of fuel from natural gas (MWh)  | 1,960,728                                   |
| 4) Consumption of fuel from other fossil sources (MWh)   | 215   |
| 5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)  | 813,059                                     |
| 6) Total consumption of fossil energy (MWh) (sum of lines 1-5)   | 11,796,543                                  |
| Share of fossil sources in the total energy consumption (%)  | 95  |
| 7) Consumption of nuclear energy (MWh)   | 533,920                                     |
| Share of the consumption of nuclear energy in the total energy consumption (%)   | 4   |
| 8) Consumption of fuels from renewables, including biomass (including industrial and municipal waste of biological origin, biogas, renewable hydrogen, etc.) (MWh) | 295   |
| 9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (Mwh)   | 86,398                                      |
| 10) Consumption of energy from renewable sources generated on our own without using fuel (MWh)   | 0   |

Table 5

| Electricity generation from non- renewables (MWh) | Electricity generation from renewables (MWh) |
|---|--|
| 10,983,484  | 295  |



## Gross Scopes 1, 2, 3 and Total GHG emissions (E1-6)

Table 6

| Category, Scope 3   | Scope 3 [tCO <sub>2</sub> e] |
|---|------------------------------|
| 1) Purchased goods and services                                       | 3,838,303                    |
| 2) Capital goods  | 0                            |
| 3) Fuel- and energy-related activities (not included in Scope 1 or 2) | 796,580                      |
| 4) Upstream transportation and distribution                           | 324,860                      |
| 5) Waste generated in operations                                      | 747                          |
| 6) Business travelling  | 166                          |
| 7) Employee commuting   | 0                            |
| 8) Upstream leased assets   | 0                            |
| 9) Downstream transportation  | 130,133                      |
| 10) Processing of sold products                                       | 1 515,725                    |
| 11) Use of sold products  | 18,760,803                   |
| 12) End-of-life treatment of sold products                            | 0                            |
| 13) Downstream leased assets  | 0                            |
| 14) Franchises  | 0                            |
| 15) Investments   | 0                            |

Table 7

|         | Gross GHG emissions 2019 [tCO <sub>2</sub> e] | Gross GHG emissions 2024 [tCO <sub>2</sub> e] |
|---------|---|---|
| Scope 1 | 4,435,972                                     | 3,617,568                                     |
| Scope 2 | 392,013                                       | 400,981                                       |
| Scope 3 | 28,573,636                                    | 25,367,318                                    |
| Total   | 33,401,621                                    | 29,385,867                                    |

The calculation of the carbon footprint of the ORLEN Unipetrol Group for 2024 as made in accordance with the directions in the GHG Protocol:

- The World Resources Institute (WRI) and the World Business Council for Sustainable Development (WBCSD), GHG Protocol, Corporate Accounting and Reporting Standard, revised edition, March 2004;
- The World Resources Institute (WRI) and the World Business Council for Sustainable Development (WBCSD), GHG Protocol, Scope 2 Guidance. Amendment to the Corporate Standard of the GHG Protocol, 2015;
- The World Resources Institute (WRI) and the World Business Council for Sustainable Development (WBCSD), Corporate Accounting and Reporting Standard in the Value Chain (Scope 3), Amendment to the Corporate Accounting and Reporting Standard of the GHG Protocol.

According to the GHG Protocol, electricity consumption-related emissions are calculated using three methods:

- Location Based (LB),
- Market Based (MB),
- Residual Mix (RM).

The attached calculations are provided using the LB method.

With the LB method, the average emission factor for the Czech Republic is used to calculate electricity consumption emissions. This factor is published each year by the Association of Issuing Bodies (AIB) as part of the European Residual Mix based on the data on the energy mix of the Czech Republic.



## GHG removals and GHG mitigation projects financed through carbon credits (E1-7)

In 2024, we did not use any projects for removing and storing GHG in own operations and in the upstream and downstream value chain. Outside the value chain, the projects were not funded through carbon credit purchases.

## Internal carbon pricing (E1-8)

Table 8

| Types of internal carbon prices         | Volume in blank burden (tCO <sub>2</sub> e) | Used prices (EUR/tCO <sub>2</sub> e) | Description  |
|---|---|--------------------------------------|--|
| Shadow price CapEx                      | 1   | 107,94                               | In the years 2025-2030, the average price of emission allowances used in investment planning is EUR 107.94 per tCO <sub>2</sub> e. For 2031 – 2035, the price of EUR 171.98 per tCO <sub>2</sub> e is applied. The price of emission allowances is considered in all our capital projects located in the jurisdictions to which EU ETS applies, and regards direct emissions generated by the projects assessed. |
| Investment in R&D, shadow price         | 0   | 0                                    | -  |
| Internal carbon fee or fund             | 0   | 0                                    | -  |
| Carbon prices for testing reduced value | 1   | 107,94                               | In the years 2025-2030, the average price of emission allowances used in investment planning is EUR 107.94 per tCO <sub>2</sub> e. For 2031 – 2035, the price of EUR 171.98 per tCO <sub>2</sub> e is applied. The price of emission allowances is considered in all our capital projects located in the jurisdictions to which EU ETS applies, and regards direct emissions generated by the projects assessed. |

We apply an internal carbon pricing system based on the shadow price mechanism and focused on Scope 1 emissions. That results in achieving climate-related objectives and enables strategic decision-making.

The internal coal price is determined for reference in regulatory frameworks, to identify low-carbon opportunities, increase energy efficiency, assess the resilience of capital projects with respect to climate change, and incorporate climate aspects into financial planning and risk assessment. Pricing factors include alignment with coal taxation levels, prices of EU ETS emission allowances, costs of achieving climate-related objectives, and scenario-based modelling.

The methodology applied considers the expected EU ETS prices according to multiple scenarios and balances the short-term market volatility to reflect the central market consensus.

The coal price is categorised according to three planning scenarios:

- basic scenario - based on standard price prognoses within the EU ETS system,
- accelerated scenario - higher coal prices leading to faster decarbonization,
- delayed scenario – lower carbon prices reflecting a slower transition due to economic restrictions.

This scaled approach provides flexibility, which allows us to react to market dynamics, motivates low-carbon investment projects and supports operational modifications.



## Anticipated financial effects from material physical and transition risks and potential climate-related opportunities (E1-9)

The anticipated financial effects from material physical and transition risks and potential climate-related opportunities will be known based on their analysis planned for 2025.

# Pollution (E2)

## Material impacts, risks and opportunities related to pollution (IRO-1)

Based on the double materiality assessment, we have identified five negative impacts; no risks and opportunities have been identified.

Table 9

| ESRS topics     | Subtopic        | Name  | Impact/risk/opportunity | Current/potential | Time horizon | Place in the value chain |
|-----------------|-----------------|---|-------------------------|-------------------|--------------|--------------------------|
| E2<br>Pollution | Air pollution   | • Air pollution with CRM substances   | Negative impact         | Current           | S,M,L        | Own operations           |
|                 |                 | • Emissions of suspended solids due to facility leakage - except for CRM substances                           | Negative impact         | Potential         | S,M,L        | Own operations           |
|                 |                 | • Air pollution with other emissions than GHG - NO <sub>x</sub> , SO <sub>x</sub> , solid dust particles, VOC | Negative impact         | Current           | S,M,L        | Own operations           |
|                 |                 | • Air pollution with other emissions than GHG at customers and suppliers                                      | Negative impact         | Current           | S,M,L        | Suppliers + customers    |
|                 | Water pollution | • Groundwater pollution due to old environmental burdens - applies to production sites                        | Negative impact         | Potential         | S,M,L        | Own operations           |



## Policies related to pollution (E2-1)

Policies related to pollution are, like in the case of policies related to climate change, described in the chapter [Policies related to climate change mitigation and adaptation \(E1-2\)](#). ↗

## Actions and resources related to pollution (E2-2)

We have stabilised pollutant emissions into the environment over the past five years thanks to extensive environmental investments. The duties of selected industrial enterprises related to the integrated pollution prevention and control (IPPC) are governed by Act No. 76/2002, as amended. All ORLEN Unipetrol RPA production units, including the refineries in Litvínov and Kralupy nad Vltavou, fall within the scope of the IPPC Act and have valid integrated permits issued by the regional authorities of the regions of Ústí nad Labem and Central Bohemia. These permits are continuously updated in connection with the requirements of amended legislation and the performance of conditions with fixed terms, the implementation of investment projects, changes in technological equipment, and changes in the substances used. In 2024, a total of ten amendments of integrated permits were issued for ORLEN Unipetrol RPA facilities.

In 2024, we stabilised emissions of all pollutants, yet minor deviations are caused by changing operating conditions. A moderate increase in total suspended particles (TSP) occurred due to more frequent bypass operations at the T700 heating plant.

## Targets related to pollution (E2-3)

ORLEN Unipetrol Group's targets related to pollution focus on reducing GHG emissions and other harmful substances by modernising technologies and investing in renewable energy sources. We seek to minimise the impact of our activities on the environment and improve our environmental footprint.

At Paramo, the boiler house in Pardubice combusted both natural gas and fuel oil. A slight decrease in SO<sub>2</sub> and NO<sub>x</sub> emissions is related to the fuel chosen for the K1 boiler (a strong preference of natural gas as fuel). The rise in VOC fugitive emissions (Volatile Organic Compounds) is linked to higher amounts of stored diesel oil and gasoline.

As a result of the termination of operations of coal-fired boilers at Spolana in December 2019, the corporate energy unit significantly reduced emissions of SO<sub>2</sub> and solids; NO<sub>x</sub> emissions are also decreasing. In 2024, emissions of sulphur dioxide from the sulphuric acid operations declined due to partly limited operations of this source resulting from the ongoing modernisation work.

In 2024, ORLEN Unipetrol Doprava saw a similar volume of VOC emissions from the cleaning and steaming station for tank trucks and rail tank cars as in the previous three years. ORLEN filling stations installed new stands equipped with an automatic Vapour Recovery System Stage II (VRSM).



## Pollution of air, water and soil (E2-4)

Air pollution  
Table 10

| Pollutant   | Total amount of pollutants discharged into air per group [kg] |
|---|---|
| Ammonia (NH <sub>3</sub> )                          | 11,498  |
| Non-methane volatile organic compounds (NMVOC)      | 168,020   |
| Nitrogen oxides (NO <sub>x</sub> /NO <sub>2</sub> ) | 2,554,895   |
| Sulfur oxides (SO <sub>x</sub> /SO <sub>2</sub> )   | 3,805,893   |
| Arsenic and its compounds (like As)                 | 33  |
| Mercury and its compounds (like Hg)                 | 40  |
| PCDD + PCDF (dioxins + furans) (like Teq)           | 0.0001  |
| Trichlorethylene                                    | 32,114  |
| Vinyl chloride                                      | 2,684   |
| Benzene   | 1,480   |

Water pollution  
Table 11

| Pollutant   | Total amount of the pollutant discharged into water per group [kg] |
|---|--|
| Nitrogen in total                                   | 240,992  |
| Arsenic and its compounds (like As)                 | 30.5   |
| Lead and its compounds (like Pb)                    | 54   |
| Zinc and its compounds (like Zn)                    | 1,230  |
| 1,2-dichloroethane (EDC)                            | 240  |
| Halogenated organic compounds (like AOX)            | 1,149  |
| Trichloromethane                                    | 37   |
| Vinyl chloride                                      | 13   |
| Total organic carbon (TOC) (like total C or CHSK/3) | 109,014  |
| Cyanides (like total CN)                            | 122  |



Water pollution

Table 12

| Total pollutant emissions into water in water-stressed areas [kg] |
|---|
| 0   |

Soil pollution

No pollutants leaked into the soil during the standard operations of ORLEN Unipetrol Group facilities in 2024.

Table 13

| Total pollutant emissions into soil in water-stressed areas [kg] |
|--|
| 0  |

Production and use of microplastics

Table 14

| Amount of produced microplastics [t] | Amount of used microplastics [t] |
|--------------------------------------|----------------------------------|
| 38, 121                              | 0                                |



## Substances of concern and substances of very high concern (E2-5)

All Group companies produce or use chemical substances and mixtures in accordance with the applicable act on chemicals and Regulation (EC) No. 1907/2006 (REACH). The products they market are classified in compliance with Regulation (EC) No. 1272/2008 (CLP), and for those displaying hazardous qualities, they prepare safety data sheets that are provided to customers free of charge.

Under REACH, safety data sheets of produced and purchased hazardous chemical substances and mixtures are made available to all employees via the intranet. We continuously meet the REACH requirement – to maintain the registration documentation up to date. This is also why we must ensure that the software application IUCLID, which processes technical documentation for registered and notified substances, is in accordance with the latest version available on ECHA’s website.

We pay attention to communication within supply chains, which is the basis for applying measures to protect the health of our employees and the environment when using hazardous chemical substances, either alone or in mixtures. We monitor and apply in practice the changes that occur as a result of specified processes connected with the registration and classification of chemical substances, and we reflect them in the safety data sheet updates. On an ongoing basis, we monitor the management of chemical substances and mixtures, from raw materials to final products, and ensure compliance with applicable laws and regulations, including internal and external testing and subsequent issuance of statutory declarations for specific applications of selected products – e.g., those coming in contact with food, drinking water, for use in healthcare, etc. We also offer customer services that provide detailed information about product properties in relation to their specific use. We are subject to international UN inspections to verify compliance with the commitments contained in the Chemical Weapons Convention. The current inspections carried out by state authorities and international inspections have proved compliance with the Convention’s obligations.

Table 15

| Type - category  | Substances of concern that are generated or used in production or purchased [tonnes] (INFLOWS) | Substances of concern that leave the Group’s facility as emissions, products or as part of products or services [tonnes] (OUTFLOWS) |
|--|--|---|
| Carcinogenicity categories 1 and 2                                   | 7,155,321  | 5,099,163   |
| Germ cell mutagenicity categories 1 and 2                            | 446,756  | 1,806,646   |
| Reproductive toxicity categories 1 and 2                             | 282,990  | 1,652,206   |
| Skin sensitisation category 1  | 18   | 1,806,655   |
| Chronic hazard to the aquatic environment categories 1 to 4          | 6,807,137  | 5,469,886   |
| Specific target organ toxicity, repeated exposure categories 1 and 2 | 6,601,668  | 3,312,451   |
| Specific target organ toxicity, single exposure categories 1 and 2   | 79   | 79  |



Table 16

| Substance name   | Substances of very high concern that are generated or used in production or purchased [tonnes] (INFLOWS) | Substances of very high concern that leave the Group’s facility as emissions, products or as part of products or services [tonnes] (OUTFLOWS) |
|--|--|---|
| Bis(α,α-dimethylbenzyl) peroxide   | 64,398   | 0   |
| Products of oligomerisation and alkylation of 2-phenylpropene and phenol             | 13,398   | 0   |
| Phenol, methylstyrenated   | 39,103   | 0   |
| Bumetrizole (UV-326)   | 238  | 0   |
| 2-(dimethylamino)-2-[(4-methylphenyl)methyl]-1-[4-(morpholin-4-yl)phenyl]butan-1-one | 44   | 0   |
| 1-methyl-2-pyrrolidon (NMP)  | 17   | 5   |

## Anticipated financial effects from pollution-related impacts, risks and opportunities (E2-6)

Based on the double materiality analysis, no material risks and opportunities were identified with respect to pollution.



# Resource use and circular economy (E5)

## Material impacts, risks and opportunities related to resource use and circular economy (IRO-1)


In connection with the double materiality analysis related to resource use and circular economy, we have identified the following impacts and one opportunity.

Table 17

| ESRS topics                             | Subtopic   | Name   | Impact/risk/opportunity | Current/potential | Time horizon | Place in the value chain   |
|---|--|--|-------------------------|-------------------|--------------|----------------------------|
| E5<br>Resource use and circular economy | Resource inflows, including resource use           | <ul style="list-style-type: none"><li>Circular economy, waste sorting and processing to recycled raw materials for petrochemistry and refineries</li></ul> | Positive impact         | Potential         | M            | Own operations             |
|   | Resource outflows related to products and services | <ul style="list-style-type: none"><li>New business opportunities related to polymer products with long life</li></ul>                                      | Opportunity             | Current           | M, L         | Own operations + customers |
|   |  | <ul style="list-style-type: none"><li>Mechanical and chemical recycling</li></ul>  | Positive impact         | Current           | S, M, L      | Own operations             |



# Policies related to resource use and circular economy (E5-1)

As regards savings of primary resources, we use the sustainable development principles and focus the basic strategy on innovative procedures resulting in optimised material inputs, and we promote continued improvements in the environmental performance. We are committed to these principles by adopting, among others, the **Integrated Management System Policy** .

# Actions and resources related to resource use and circular economy (E5-2)

The ORLEN Unipetrol Group sees advantages in plastic materials, such as their versatility, lightness, and safety. Nonetheless, the traditional linear model—taking, producing, using, and throwing out—poses questions and challenges about how to dispose of plastic waste that is a burden on the environment. Therefore, we are developing circular economy principles in our business, within which we aim to gradually replace input fossil raw materials with circular raw materials. We assume responsibility for our products, from the time of their origin up to their final disposal, in order to reduce waste, save natural resources, and minimise the environmental impact, thereby contributing to economic growth and new opportunities in this industry.

In connection with our strategic objectives related to the circular economy and sustainability, we aim to develop three main sustainable activities: mechanical recycling, advanced chemical recycling (pyrolysis), and production from biogenic raw materials. These three directions complement each other and represent different approaches of our customers. REMAQ is

active in mechanical recycling of polypropylene, polyethylene, and polystyrene in Central and Eastern Europe. It specialises in the production of high-quality regranulates from these plastics, which are intended to replace primary resources in various applications. We offer products ENVITEN® and ENVILOOP®.

We also engage in researching plastic waste pyrolysis (chemical recycling). In pyrolysis, a pre-treated input raw material (sorted plastic waste) is batched into facilities, where it is broken down into hydrocarbons in an oxygen-free environment and under high temperatures. These hydrocarbons can be further used as part of the feed for the petrochemical production. The crucial advantages of chemical recycling include the possibility to treat hard- to-recycle plastic waste (e.g., plastic mixtures with multiple plastic components, plastics with a high rate of various contamination levels), production of products from recycled plastics in the quality that is identical to the quality of virgin plastics, supporting the circular economy by reducing the consumption of fossil resources.



## Targets related to resource use and circular economy (E5-3)

The main objective in this segment is to continue investments in reinforcing our market position with a focus on recycling and products with a high added value, which the ORLEN Unipetrol Group can describe in the following points:

- an integrated petrochemical producer caring about sustainability, and paying particular attention to expanding its portfolio with sustainable petrochemical products; strengthening the integration – balance of basic chemicals; complementing the existing value chains,
- a strong position in polymers, mainly developing the existing polymer portfolio and expanding the value chain, e.g., by producing mixtures, additives, and concentrates,
- a strong position in mechanical and chemical recycling, i.e., building a strong foundation for the further development of sustainable production, including plastics recycling, and a focus on the relevant markets near our production plants.

We are gradually ready to expand the fuel portfolio with biofuels based on natural and artificial waste materials. We test biofuel production from wood chips or used oil. In 2024, we also tested the collection of used cooking oil at selected ORLEN filling stations. By 2030, we want to produce up to 7% of plastic products from waste materials. We have been operating a testing pyrolysis unit since 2020 to gain insights for the construction of a real pyrolysis unit.

## Resource inflows and outflows (E5-4, E5-5)

In 2024, the company mainly used primary resources.

**Table 18**            **Resource use and circular economy**

| Resource inflows into the organisation   | Weight [t]     |
|--|----------------|
| Total weight of product inflows into the organisation  | 2,714          |
| Total weight of inflows of biological materials into the organisation  | 0              |
| Total weight of inflows of technical materials into the organisation   | 274,363        |
| <b>Total weight of products, biological and technical materials</b>  | <b>277,077</b> |
| Total weight of biological materials (and biofuels used for non-energy purposes) used to manufacture the undertaking’s products and services (including packaging) that are sustainably sourced    | 0              |
| Total weight of secondary reused or recycled components, secondary intermediary products and secondary materials used to manufacture the undertaking’s products and services (including packaging) | 0              |



In 2024, we had lower waste amounts compared to the previous years despite the conducted turnaround and maintenance works.

The Kolín site reduced waste production due to the termination of production units and the activities of contractors involved in the site demolition work, which became waste producers. Paramo saw an increase in waste production due to investment projects. Lower production of hazardous waste at ORLEN Unipetrol Doprava is related to the lower use of steaming station capacities in Litvínov. The production of non-hazardous waste decreased in connection with the waste prevention measures, and no railway vehicles were taken out of service.

The higher production of hazardous waste at Spolana over the past few years is linked to the shutdown, decontamination, and gradual disassembly of selected technological units from the former amalgam electrolysis operations. The production of hazardous waste has been at low levels since 2024. Variations in the production of non-hazardous waste are related to the one-time disposal of metal waste. The nearly constant annual production of sludge from the wastewater treatment process represents a significant share of non-hazardous waste.

ORLEN filling stations have implemented a new waste management system.



Table 19

| Name  | Weight [t]    |
|---|---------------|
| Total weight of waste diverted from disposal  | 11,904        |
| <b>Total weight of hazardous waste diverted from disposal</b>                               | <b>2,514</b>  |
| Total weight of hazardous waste diverted from disposal due to preparation for reuse         | 139           |
| Total weight of hazardous waste diverted from disposal due to recycling                     | 1,310         |
| Total weight of hazardous waste diverted from disposal due to other recovery operations     | 1,065         |
| <b>Total weight of non-hazardous waste diverted from disposal</b>                           | <b>9,390</b>  |
| Total weight of non-hazardous waste diverted from disposal due to preparation for reuse     | 9             |
| Total weight of non-hazardous waste diverted from disposal due to recycling                 | 9,366         |
| Total weight of non-hazardous waste diverted from disposal due to other recovery operations | 15            |
| <b>Total weight of non-recycled waste</b>   | <b>15,331</b> |
| <b>Total weight of hazardous waste directed to waste treatment</b>                          | <b>2,645</b>  |
| Total weight of hazardous waste directed to disposal by incineration                        | 262           |
| Total weight of hazardous waste directed to disposal on the landfill                        | 801           |
| Total weight of hazardous waste directed to disposal by other disposal operations           | 1,582         |
| <b>Total weight of non-hazardous waste directed to disposal</b>                             | <b>12,686</b> |
| Total weight of non-hazardous waste directed to disposal by incineration                    | 20            |
| Total weight of non-hazardous waste directed to disposal on the landfill                    | 12,400        |
| Total weight of non-hazardous waste directed to disposal by other disposal operations       | 267           |
| <b>Total weight of produced waste</b>   | <b>27,235</b> |
| <b>Total weight of hazardous waste</b>  | <b>5,159</b>  |
| Total weight of radioactive waste generated by the Group                                    | 0             |
| <b>Total weight of non-hazardous waste</b>  | <b>22,076</b> |



# 03

## SOCIAL INFORMATION

Own workforce  
Workers in the value chain  
Affected communities  
Consumers and end-users





# Own workforce (S1)

## Interests and views of stakeholders (S1, SBM-2)

Our goal is to consider the social implications of our business activities. We systematically choose activities that empower our employees, ensure fair working conditions, encourage growth and development and, last, but not least, help with work-life balance. We establish the employees’ interests through:

- training courses based on the performed profession,
- dialogues related to personal development,
- workplace surveys and evaluations,
- direct engagement of trade union organisations,
- an employee forum,
- grievance mechanisms.

We aim for fair remuneration and enhanced employee motivation. We strive to recruit key experts who are interested in contributing to the overall positive development of the entire Group. We support values, principles, and ethical standards aimed at building an atmosphere of acceptance and deepening our understanding of diversity and its significance to the employer. We support an inclusive working environment, providing equal opportunities to all employees regardless of their gender, civil status, parenthood, ethnic, national, or social origin, sexual orientation, religious beliefs, political affiliation, age, disability, or membership in trade unions. We recognise the employees’ right to honestly and directly speak about issues they are concerned about, as well as their right to privacy. We recognise that fostering a friendly and safe work environment is essential for our continued success. We follow a special strategic direction with respect to safety and health protection, fire safety, and emergency readiness. Together with our employees, these are the cornerstones of our safety culture.



## Material impacts, risks and opportunities and their interaction with strategy and business model (S1, SBM-3)

The table contains the evaluated material impacts. Risks and opportunities related to own workforce have not been identified.

Table 20

| ESRS topics         | Subtopic  | Name  | Impact/ risk/ opportunity | Current/ potential | Time horizon | Place in the value chain |
|---------------------|---|---|---------------------------|--------------------|--------------|--------------------------|
| S1<br>Own workforce | <b>Working conditions</b>                               |   |                           |                    |              |                          |
|                     | • Job stability   | • Stable employment in regions  | Positive impact           | Current            | S, M, L      | Own operations           |
|                     | • Adequate wages  | • Wage level compared to labour market                                | Positive impact           | Current            | S, M, L      | Own operations           |
|                     | • Health and safety                                     | • Employee injuries resulting in incapacity for work                  | Negative impact           | Current            | S, M, L      | Own operations           |
|                     | <b>Equal treatment and opportunities for all</b>        |   |                           |                    |              |                          |
|                     | • Gender equality and equal pay for work of equal value | • Insufficient representation of women in senior managerial positions | Negative impact           | Current            | M            | Own operations           |
|                     | • Training and skills development                       | • Employee development thanks to an efficient training system         | Positive impact           | Current            | S, M, L      | Own operations           |



For the ORLEN Unipetrol Group, we set specific initiatives that will be adapted to the updated sustainability strategy of the ORLEN Group. We regularly monitor the level of employee engagement and satisfaction, which enables us to adapt workforce needs while maintaining compliance with strategic objectives and the employees’ living standards. This approach is documented with an example of flexible work arrangements and policies that support physical and mental health, which, in turn, support productivity and innovative thinking.

We have identified material topics relevant to employees in the production and administrative sectors. Some of them work under employment contracts, while others work under other labour law documents, such as agreements to perform a job or agreements to perform work. Our operations directly affect only these employees, who are an integral part of our business. This approach allows us to maintain a stable and controlled working environment in all areas of our activities. A detailed description of the types of employees and non- employees is given in the chapter **Health and safety metrics (S1-14)**.

**The negative material impact concerns individual incidents related to OHS, which we differentiate as follows:**

- employee injuries resulting in incapacity for work,
- employee injuries not resulting in incapacity for work,
- severe employee injuries – mass accidents and/or fatalities.

**The negative system-related material impact** concerns the equality of women and men and the same pay for work of equal value. The share of women in senior managerial positions is lower due to a higher share of men among technically educated experts in the country. That is why companies active in the heavy industry (energy, petrochemistry, chemistry, engineering, etc.) have a higher share of men in the top management.

A **positive impact** was achieved primarily through systematic pay rises, compliance with statutory standards, effective communication with employee representatives, support for trade unions, flexible working hours, financial support for parents upon their child’s birth, and exceptional training and development schemes. We have identified material topics only in the case of own employees. Self-employed persons and agency workers were not included in the double materiality assessment.

**A transition plan** to reduce negative impacts on the environment and achieve more environmentally friendly and climate-neutral operating activities is not currently in place; nonetheless, the ORLEN Unipetrol Group places substantial emphasis on reducing the accident rate in the workplace and implementing consistent OHS and process safety standards. Another key area of our interest is to support the physical and mental wellbeing of our employees by expanding our portfolio of professional development programmes to enhance skills relevant to the company’s energy transition. It is also our ambition to remain a leading employer in the Ústí Region and throughout the Czech Republic.

**Child, forced or mandatory work**

We have zero tolerance for any form of abuse or violation of human and children’s rights. We comply with all legal requirements and duties. In our activities, we strictly prohibit any form of abuse, human trafficking, slavery, forced and child labour in all our operations and countries where we carry on business. The ORLEN Unipetrol Group, through its parent company ORLEN, is a part of the UN Global Compact. We verify our suppliers in countries with high-risk activities. The checked criteria include financial stability, ISO certification, references, the tenderer’s business in high-risk countries, impacts of international sanctions, reputational risk, risk of law violations, etc. We consider the geographical aspect of the locations from which we take crude oil.

**Activities impacting people with characteristics**

We have defined types of work that are not suitable for women in general, pregnant women, breastfeeding women, and mothers until the end of the ninth month after giving birth. We have identified types of work and workplaces prohibited for young employees. Employees must be physically fit to perform their job. The company has a system in place for preventive medical examinations.



# Policies related to own workforce (S1-1)

We have implemented a set of documents and principles supporting the management of material impacts on our employees. Some of them have a universal scope, while others were created with a focus on specific impact areas. The current key sustainability-related documents of the ORLEN Unipetrol Group that regard **our own workforce** include:

- **Code of Ethics** ↗ lays down clear, practical, and current rules defining ethical standards valid for all employees with regard to our basic values: responsibility, progress, people, energy, and reliability.
- **Human Rights Protection Policy** ↗ outlines the crucial standards of conduct and regulations valid at our Group. These principles are to, directly and indirectly, manage the protection of human rights in the organisation and its relations with external stakeholders. These measures are based on internal guidelines, national legislation, and internationally recognised standards and directives such as:
  1. Declaration of Human Rights,
  2. International Labour Organisation,
  3. The UN Guiding Principles on Business,
  4. Organisation for Economic Cooperation and Development (OECD),
  5. Standards of the International Financial Corporation,
  6. Ten principles of the UN Global Compact initiative.

**As regards the matters related to human rights, forced labour, and child labour**, the policy clearly confirms the ORLEN Unipetrol Group’s position and its zero tolerance towards any form of abuse or violation of human rights and the rights of the child. Any potential case of a breach of human and children’s rights will be immediately reported to the competent investigative, prosecuting and adjudicating bodies.

ORLEN Unipetrol Group companies support the generally embedded protection of informants of unlawful conduct (whistleblowers). The company management is aware that informants of any unlawful conduct, including corruption practices, are a vulnerable group and may be exposed to various types of discrimination in the workplace. Therefore, the ORLEN Unipetrol Group management is mindful that all substantial elements of this protection are observed, i.e., the protection of the whistleblower’s identity, protection against disadvantaging the whistleblower at work, etc. The ORLEN Unipetrol Group protects individuals who report unlawful conduct, provided the information is given in good faith, even if the report is later found to be false. On the other hand, intentionally untrue reports are resolved with the whistleblower in accordance with applicable legislation.

From the moment a report is submitted or disclosed, the whistleblower is protected against retaliation, including rejection of employment, dismissal, harassment, or wage reduction. Any attempts at retaliation or threats are strictly forbidden at the ORLEN Unipetrol Group.

- **Basic regulation concerning occupational health and safety**  
The policy regarding the OHS management system, fire safety, and the safety of storing and transporting dangerous goods aims to ensure consistent OHS standards for employees and operational processes.
- **Integrated Management System Policy** ↗  
This policy is a declaration to ensure quality, minimise environmental impacts, ensure employee safety and security of the information closely related to our Group’s fundamental values.
- **Training and skills development**  
Rules and procedures for providing training. All employees have equal access to and opportunities for development to enhance their competencies. When planning training programmes, we consider the applicable statutory requirements, arrangements with trade union organisations, employee feedback, and individual development plans. The related rules and processes are published through our internal communication tools, which are available to all employees.
- **Principles of personal data and trade secret protection**  
Implementations of the rules for personal data protection and processing in accordance with the GDPR, Act No. 110/2019 Sb., on Personal Data Processing, and other generally binding national and EU regulations. In terms of the trade secret protection, the Group has formulated and implemented the trade secret protection rules under Act No. 89/2012 Sb., the Civil Code of the Czech Republic, Act No. 221/2006 Sb., on Enforcing Industrial Property Rights and Trade Secret Protection, as well as other generally binding national and EU legislation, into its internal guidelines. The above internal guidelines are also derived from the rules embedded at the parent company, ORLEN S.A., and are updated as necessary.  
We have adopted other directives and policies that are essential for people management and reinforce and supplement our company’s values. The guidelines on human resources contain directions for labour relations and support effective and organised employee management. They include measures related to employee recruitment and selection processes, personal data protection, employee remuneration, healthcare systems, professional procedures for approving overtime work, and employee training. All guidelines related to own workforce are available to employees on the intranet.



## Processes for engaging with own workers and workers’ representatives about impacts (S1-2)

Establishing a dialogue and obtaining feedback from employees plays a crucial role when managing the real impact on our own workforce. Feedback from employees plays a significant role in decision-making processes and activities. Every three years, we conduct an employee satisfaction survey to establish the employee climate and the level of the corporate culture. The insights gained from satisfaction surveys inform about the implementation of targeted solutions focused on improving organisational processes, evaluating training quality, and assessing cooperation with service providers, e.g., for training purposes.

Each employee may submit any report or complaint that are considered by the ethical standards ombudsperson. There are also other options to report violations of corporate values or the Code of Ethics: concerns may be reported to the immediate supervisor or another manager. If there is a serious reason why they cannot turn to their immediate supervisor or another manager with a request for help and address ethical problems, employees can notify the director for safety and control – by mail, email, over the phone, or in person.

We regularly maintain a social dialogue with employee representatives – trade union organisations, which may suggest improvements in working conditions. The management of labour relations and the relationship to employee representatives is based on the principles of mutual respect and an open and transparent dialogue in collective bargaining.

## Processes to remediate negative impacts and channels for own workers to raise concerns (S1-3)

We have various channels to express concerns and remediate incidents. These channels are designed to ensure that any opinions, interests or problems are addressed effectively. We have established a channel for ethics and compliance, which enables both employees and third parties to express their concerns, report potential violations and negative incidents, and do so fairly and in a confidential manner. Our employees are not only given space to express their opinions in surveys, but they can also come up with their own suggestions and be actively involved in changes via an internet discussion forum, the IDEA platform or the ethical standards ombudsperson. We have an anonymous phone line in place operated by the Control and Safety Division. This line is available for anonymous reports of suspected corruption cases, discrimination, and other suspected violations of applicable legislation and internal guidelines. We have implemented anonymous email addresses. The Control and Safety Division guarantees that no steps will be taken to find the email sender.

All employees are provided with a transparent remuneration system, including numerous benefits, to support a healthy work-life balance. Our primary goal is to enhance the employer’s prosperity and meet the evolving needs and interests of all employees. We aim for fair remuneration and enhanced employee motivation. We have embedded the equal pay principles in the collective bargaining agreement, which sets out clear rules of access regardless of gender, age, colour, sexual orientation, language, faith, and religion. We are neutral towards political or differing views, membership in political parties or movements, trade union organisations, and other associations. We do not tolerate any form of discrimination, bullying, harassment, intimidation, or humiliation. We respect the compliance with the principle of equal pay and equal working conditions for the same or equal work, which we strive to achieve.

The implemented policies related to the protection of persons and others that promote a positive corporate culture are published in accordance with ESRS G1-1.



# Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions (S1-4)

We have in place system-based measures focused on addressing material impacts with own employees. We have taken the following actions with respect to impacts:

### Adequate wages

We actively monitor wage trends on the market and compare them with internal pay practices. Where reasonable, we optimise our procedures, e.g., by amending collective bargaining agreements or internal remuneration rules, or suggest targeted wage hikes for crucial talents. Additionally, we implement annual wage increases in accordance with the agreed rates. These procedures enable us to manage critical areas, including secure employment and adequate wages.

### Secure employment

Supporting the physical and mental wellbeing of our employees is one of our key areas of focus. Our employees can utilise various benefits related to health, sports, travel, culture, childcare, and free time. We pay above-standard rooms for our employees in hospitals across the Czech Republic. We reimburse recovery stays for employees working with self-contained breathing apparatuses. We provide above-standard medical examinations, meal vouchers, or discounts for car refuelling at ORLEN filling stations. Employees are granted paid leave beyond the government regulations (childbirth, the child’s first day of school). We provide a financial contribution when a child is born, as well as contributions for children’s recreation/green stays. We make a significant contribution to the Multisport card for employees. The standard working hours in our company are 37.5 hours per week. After an agreement with the manager, employees can use the flexible model of working remotely from home. We aim to offer flexible working hours and shorter working days, taking into account the nature of the work. Our employees are entitled to five weeks of annual holidays as a standard. Employees working in continuous operations are granted six weeks of holidays. We give a financial reward for recommending a new colleague. We reimburse the day spent volunteering in a non-profit organisation as part of Volunteer Days. We financially support a telephone line for mental distress, Most k naději, via the ORLEN Unipetrol Foundation. This non-profit organisation operates an anonymous non-stop line providing psychological assistance. We offer immediate psychological help to affected employees in the case of any emergency. We regularly arrange thematic training sessions and preventive programmes about the burnout syndrome and setting a work-life balance.

### Gender equality and equal pay for work of equal value

We are the signatories of the Charter of Diversity. We promote values, policies, standards, and conduct that ensure equal treatment of employees, we raise the awareness and understanding of the importance of diversity and create conditions for

an open and tolerant workplace. We value varied approaches that become values thanks to diversity, as different views can energise positive results.

### Training and skills development

We offer statutory training to our employees, including occupational safety, driver training, and professional workshops, as well as training courses that develop soft skills, such as language lessons, educational and development programmes, and training and development for internal lecturers. We arrange personality coaches for managers and provide the option to develop managerial skills. Our employees also have the opportunity to study at a university directly on the premises of Chempark at the University Centre of VŠCHT Praha - FS +VUT - ORLEN Unipetrol in Litvínov, thereby increasing their qualifications and education. New employees hired for operator positions are trained in the unique Training Centre for three to six months, where they learn both theory and practical skills on miniature models. The Training Centre engages mainly our experienced internal lecturers. We use an exercise unit, simulators, and virtual reality for training purposes. We have an elaborate training system for the staff at ORLEN filling stations. We offer an e-learning programme about customer service standards, OHS, and product training. It is supplemented by two training buses that tour around filling stations, training their staff in mental hygiene and an active approach to customer service.

### Health and safety

We pay maximum attention to occupational health and safety. All employees must comply with the rules defined in the internal documentation. We regularly announce internal safety campaigns and annually hold Safety Days for employees. We keep records of any emergencies. Based on the conclusions of investigations and an analysis of an emergency and in order to establish the cause of an emergency, we adopt measures to prevent future emergencies. It is a mandatory step in the event of any emergency to prepare a notice about the accident. We have in place tools for risk identification, analysis, and evaluation. Based on their evaluation, we implement precautions. The companies within the Group use a single methodology to identify, analyse, and evaluate risks. A safety meeting is held once a week to provide information about occupational health and safety, fire and process safety, as well as the transportation of dangerous goods. All information and materials discussed at the safety meetings are shared on the intranet. We have implemented a single system for monitoring selected safety-related performance indicators, including the tracking of target values.



# Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S1-5)

## Health and safety

Our OHS policy sets out the protection of employee health as a strategic priority. Accordingly, we monitor the frequency of injuries resulting in incapacity for work (including fatalities) among employees and selected external suppliers. In line with the updated ORLEN 2035 strategy, we have adopted the objective of reducing the Total Recordable Incident Rate (TRIR) to below 0.2 by 2035. The Group seeks to maintain the injury frequency indicator below 1.70.

- Targets for 2024: LTIFR≤ 1.70
- Target by the end of 2035: LTIFR <1.0

We monitor the frequency of injuries resulting in incapacity for work (including fatalities) among the contractors’ employees, depending on the number of hours worked.

Abbreviations explained:

TRIR (Total Recordable Incident Rate) = number of work-related incidents resulting in incapacity for work and fatalities of employees and contractors \* 200,000 / total number of hours worked by employees and contractors.

LTIFR (Total Recordable Incident Rate) = number of work-related incidents resulting in incapacity for work and fatalities of employees and contractors \* 1,000,000 / total number of hours worked by employees and contractors.

# Characteristics of employees (S1-6)

In 2024, the employment policy at the ORLEN Unipetrol Group focused on recruiting key experts to support day-to-day operational activities and implement strategic projects.

Table 21

| Gender | Headcount at the end of the reporting period |
|--------|--|
| Women  | 1,784  |
| Men    | 3,906  |
| Total  | 5,690  |

Table 22

| Country        | Headcount at the end of the reporting period |
|----------------|--|
| Czech Republic | 4,991  |
| Germany        | 17   |
| Slovakia       | 116  |
| Hungary        | 566  |
| Total          | 5,690  |



Table 23

| Gender        | No. of employees | No. of temporary employees | No. of permanent employees | No. of employees without guaranteed working hours | No. of full-time employees | No. of part-time employees |
|---------------|------------------|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Women         | 1,790            | 157                        | 1,663                      | 0   | 1,721                      | 67                         |
| Men           | 3,900            | 436                        | 3,464                      | 0   | 3,877                      | 25                         |
| Others        | 0                | 0                          | 0                          | 0   | 0                          | 0                          |
| Not published | 0                | 0                          | 0                          | 0   | 0                          | 0                          |
| Total         | 5,690            | 593                        | 5,097                      | 0   | 5,598                      | 92                         |

Collective bargaining coverage and social dialogue (S1-8)

At the ORLEN Unipetrol Group, collective bargaining applies to 86.4% of employees. Thirteen trade union organisations operate across the Group, engaging in transparent communication. The Board of Directors and Executive Directors of all companies in the Group are responsible for conducting a social dialogue. Two members of the governing body are required to sign the collective bargaining agreement. Collective bargaining with trade unions takes place each year. The current collective bargaining agreement at ORLEN Unipetrol RPA is valid until the end of 2026. The collective bargaining aims to regulate individual and collective relations between the employer and employees, setting specific terms and conditions related to labour law, wages, social issues, and occupational health and safety conditions. Thus, our employees are given long-term certainty as regards their rights, pay, and benefits. Within the European Economic Area (EEA), the rate of employee coverage is the same because the ORLEN Unipetrol Group employs people only in the EEA territory.

The European Works Council serves as a platform for sharing information about all material aspects of the Group’s activities for consulting on decisions with cross-border consequences for employees. It operates as a formal body representing employees, enabling them to participate in matters concerning ORLEN Unipetrol Group’s operations. The Council’s activities currently cover the following ORLEN Group countries: Poland, the Czech Republic, Lithuania, Latvia, Estonia, Germany, Slovakia, and Hungary. The Council represents 100% of employees in each of these countries.

Diversity metrics (S1-9)

We support values, principles, and ethical standards. Through our conduct and measures, we foster an environment that promotes openness and tolerance. We promote an inclusive working environment, providing equal opportunities to all employees regardless of their gender, civil status, parenthood, ethnic, national, or social origin, sexual orientation, religious beliefs, political affiliation, age, disability, or membership in trade unions. We recognise the employees’ right to honestly and directly speak about issues they are concerned about, as well as their right to privacy. We do not interfere with their private

and family matters. We are a signatory to the Charter of Diversity, which means that we implement, or update measures adopted based on equal opportunities in the workplace. We respect the compliance with the principle of equal pay and equal working conditions for the same or equal work. We strive to ensure suitable conditions for employees returning from maternity or parental leave, as well as for aligning their private and professional lives.



Table 24

| Women | Men   | No. of employees under 30 years of age | No. of employees aged 30-50 | No. of employees over 50 years of age |
|-------|-------|--|-----------------------------|---------------------------------------|
| 31.5% | 68.5% | 745                                    | 2,635                       | 2,310                                 |

Adequate wages (S1-10)

All ORLEN Unipetrol Group employees are paid adequately in accordance with the valid reference values.

Social protection (S1-11)

100% of our employees are covered by social protection against illness, unemployment, work-related incidents, acquired disability, invalidity, parental leave, and retirement through the public administration. In addition to the obligatory statutory contributions to employees’ social security, we also make voluntary contributions to their supplementary pension savings.

This employer’s contribution (mostly 3% from the employee’s assessment base for social security contributions – the maximum contribution amount is limited) is conditioned by the minimum regular contribution from the employee’s own funds.

Persons with disabilities (S1-12)

Persons with disabilities comprise 1.3% of the total workforce. All cases of employees with disabilities are valid according to the statutory definitions in the Czech Republic.

Table 25

| Gender | No. of employees with disabilities |
|--------|------------------------------------|
| Women  | 22                                 |
| Men    | 52                                 |
| Total  | 74                                 |



## Training and skills development metrics (S1-13)

In addition to the mandatory statutory training, we invest in developing professional and language skills. Considering the increasing demands for employee competencies, we also focus on digitalization, innovations, and IT skills. We also operate a training centre on our premises, which provides training options for both new and existing employees. The managerial roles in production are, in particular, filled from internal sources – internal candidates are prepared for this role one to three years in advance, depending on the position. All open positions are published on the internal intranet, and each employee can participate in the selection process. It has been established that internal employees can always participate in the selection process. Due to the generational shift, the company is aware of the upcoming retirement process and has sufficient time to prepare its internal employees for their new positions.

Table 26

| Gender | No./ share of employees participating in the regular performance evaluation and career development | No. of training hours (employees) |
|--------|--|-----------------------------------|
| Women  | 1,387/24.3%  | 22,525                            |
| Men    | 3,708/65.2%  | 63,556                            |
| Total  | 5,095/89.5%  | 86,081                            |

To our employees, we offer:

- training in developing soft skills,
- specialised (technical) training to deepen their industrial knowledge and expertise,
- participation in conferences, workshops, and congresses,
- foreign language courses,
- higher education,
- coaching,
- e-learning programmes,
- mandatory training.

Table 27

| Employee category        | No. of employees participating in the regular performance evaluation and career development | No. of employees | No. of training hours (employees) |
|--------------------------|---|------------------|-----------------------------------|
| Top management           | 64  | 79               | 1,388                             |
| Middle management        | 624   | 660              | 11,073                            |
| Technical staff          | 1,779   | 1,838            | 33,204                            |
| Administrative employees | 124   | 1,158            | 685                               |
| Production workers       | 2,902   | 2,902            | 39,731                            |
| Total                    | 5,500   | 6,637            | 86,081                            |



## Health and safety metrics (S1-14)

Structured occupational health and safety (OHS) management systems have been implemented across the entire ORLEN Unipetrol Group, in line with internal documents and operational guidelines, and are fully compliant with national requirements. These systems cover the entire Group’s workforce. They are subject to controls at the central level at ORLEN S.A. A significant majority of ORLEN Unipetrol Group companies adhere to the OHS management in accordance with ISO 45001, or their systems undergo internal and external audits. These companies have adopted OHS principles that cover all operational areas and apply to those classified as own workforce. These principles also apply to the safety management of suppliers. At the Group level, we have introduced a comprehensive approach to OHS management based on policies.

The system policy defines requirements in three critical areas:

- occupational health and safety,
- fire safety,
- safety related to the storage and transportation of dangerous goods.

For efficient OHS management, the ORLEN Group has implemented a classification system differentiating between:

- people employed at the ORLEN Unipetrol Group under employment contracts and civil-law contracts (e.g., contracts for specific tasks, contracts for occasional work, etc.), contracts for B2B cooperation, and contracts for external services,
- suppliers, i.e., employees of external companies performing work for ORLEN Unipetrol Group companies, such as on-site maintenance, project-related services or tasks. Suppliers also include employees at the filling stations operated by entities within ORLEN Unipetrol RPA – Benzina branch.

Table 28

| No. of (own) employees to whom the OHS management system applies | No. of non-employees (in own workforce), to whom the OHS management system in the company applies | No. of persons in the entity’s own workforce to whom the OHS management system applies | No. of (own) employees to whom the corporate OHS management system applies that was internally/externally audited or certified by an external party | No. of non-employees (in own workforce) to whom the corporate OHS system applies that was internally/externally audited or certified by an external party | Total number of people in the accounting unit’s own workforce to whom the corporate OHS system applies that was internally/externally audited or certified by an external party |
|--|---|--|---|---|---|
| 5,690  | 390   | 6,113  | 5,046   | 0   | 5,046   |



Table 29

| Category  | No. of deaths due to work-related incidents | No. of deaths due to work- related ill health | Total no. of deaths due to work-related incidents and occupational diseases | No. of work-related incidents with absence from work (LTI) | No. of work-related incidents without incapacity for work (MTC, FTC) | Total no. of work-related incidents | No. of cases of recordable work-related diseases that are not work-related incidents (LTI, MTC, FAC) | No. of days lost due to work-related incidents (LTI) | No. of hours |
|---|---|---|---|--|--|-------------------------------------|--|--|--------------|
| Own employee (contract of employment)   | 0   | 0   | 0   | 25   | 59   | 84                                  | 0  | 1,895  | 9,680,535    |
| Non-employee (in own workforce) (e.g., B2B, mandate contracts, managerial contracts)  | 1   | 0   | 1   | 4  | 0  | 4                                   | 0  | 512  | 557,400      |
| Other workers working in the company’s plants, such as value chain workers if they work in the company’s plants (e.g., other suppliers) | 0   | 0   | 0   | 8  | 11   | 19                                  | 0  | 0  | 7,852,277    |
| Total   | 1   | 0   | 1   | 37   | 70   | 107                                 | 0  | 2,407  | 18,090,212   |



**Information about the reporting methodology**

The number of persons affected with fatalities is related to the number of work-related injuries – fatalities, whether the victim was an employee or a contractual partner, if the person died within six months from the date of the accident.

We monitor the LTI (Lost Time Injury) – the number of injuries resulting in incapacity for work or injuries with absence from work (including fatalities). These injuries are recognised by the employer as so severe work-related incidents that the employee cannot perform their job at least one day after the injury. LTI is an essential indicator in risk and occupational safety management.

The index of frequency of work-related incidents resulting in incapacity for work, LTIFR (Lost Time Injury Frequency Rate), is a frequency of work-related incidents calculated according to the following formula: the number of work-related incidents, including fatalities (LTI), multiplied by 1,000,000 and divided by the number of hours worked.

The number of hours refers to the hours actually worked without incapacity for work and holiday days. In the case of employees, this information is provided by the HR and wage systems. For suppliers, the working hours are calculated based on contractual terms. If time monitoring systems are not available, estimated values can be used.

The number of recognised occupational diseases reflects the official decisions issued by state bodies, which confirm and certify occupational diseases in persons who are or were employed by ORLEN Unipetrol Group companies. These diseases can be directly attributed to the working environment factors or the nature of the work performed.

The number of days lost as a result of work-related incidents reflects the total number of days of incapacity for work taken due to work-related incidents or diseases.

**Work-life balance metrics (S1-15)**

All our employees are entitled to a leave for family reasons based on the statutory provisions of the Czech Labour Code.



## Compensation metrics (S1-16)

The currently valid, established and newly developed compensation frameworks are expressly prepared regardless of gender or other factors that are not based on merit.

The proportion of the total annual remuneration of the best-paid employee to the median of the total annual pay of all employees stands at 5.62.

The calculation of the total annual compensation and the comparison of the best-paid employee’s annual compensation with the median annual compensation of all other employees (excluding the best-paid employee) for the entire ORLEN Unipetrol Group represent a significant data collection effort.

The table shows wage ratio indicators for selected companies. For each entity, we provide the best-paid employee and the mean value of total annual compensation for employees, based on the information on annual income for 2024.

Table 30

| Share for each company      |      |
|-----------------------------|------|
| ORLEN Unipetrol Doprava     | 3.01 |
| Paramo                      | 2.90 |
| ORLEN Unipetrol RPA         | 6.46 |
| Spolana                     | 5.22 |
| ORLEN UniCRE                | 7.20 |
| HC Verva Litvínov           | 2.04 |
| ORLEN Unipetrol Slovakia    | 2.49 |
| Butadien Kralupy            | 5.24 |
| ORLEN Unipetrol Deutschland | 2.17 |
| Remaq                       | 4.31 |
| Petrotrans                  | 1.19 |
| ORLEN Unipetrol Hungary     | 2.15 |
| ORLEN Hungary               | 6.80 |

## Incidents, complaints and severe human rights impacts (S1-17)

In 2024, the ORLEN Unipetrol Group did not establish any incidents, complaints or severe human rights impacts. The reports that the ethical standards ombudsperson received in 2024 primarily concerned problems in cooperation, inappropriate communication practices or inappropriate interpersonal relations. There were no cases of discrimination in the workplace due to gender, race or ethnic origin, nationality, religious belief or opinion, disability, age, sexual orientation or other relevant

forms of discrimination or incidents, including embezzlement of company assets. The ethical standards ombudsperson received and examined ten reports submitted through the channels that employees can use to raise concerns. We implemented remedial measures in justified cases, such as conducting mediation interviews with a view to reaching an agreement. Not even a single case involved a serious incident or violation of human rights.



Table 31

| Overview of incidents, complaints, and serious impacts related to human resources   | 2024 |
|---|------|
| Total number of discrimination cases, incl. harassment, of all employees, reported in the reporting period  | 0    |
| No. of complaints regarding incidents in the social area and human rights   | 10   |
| Number of complaints submitted through channels that people from the undertaking’s own workforce can use to raise concerns (incl. grievance mechanisms)   | 10   |
| Number of complaints submitted to national contact points for multinational enterprises, OECD   | 0    |
| Total amount of fines, penalties, and compensation for damages for the incidents and complaints given above   | 0    |
| Number of severe human rights incidents related to own workforce  | 0    |
| Number of severe human rights incidents connected to the undertaking’s workforce in the reporting period, which are cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises | 0    |
| Total amount of fines, penalties and compensation for damage for the incidents described above and a reconciliation of the monetary amounts disclosed in the most relevant amount in the financial statements   | 0    |

Information about channels that people from the undertaking’s own workforce can use to raise concerns, including mechanisms, is given in the chapters **Processes for engaging with own workers and workers’ representatives about impacts (S1-2)** and **Processes to remediate negative impacts and channels for own workers to raise concerns (S1-3)**.



# Workers in the value chain (S2)

## Interests and views of stakeholders (S2, SBM-2)

Our business strategy and sustainable development strategy align with the interests of our stakeholders in areas such as the environmental protection, shared responsibility for business practices related to occupational health and safety, business ethics, care for employees and local communities, and respect for human rights in the supply chain. All of this is reflected in our procurement policy and the Code of Conduct for Suppliers. This Code serves as a crucial tool in our collaboration with suppliers, including the processes of supplier qualification and evaluation. In the coming years, we plan to expand and perfect the criteria of sustainability and performance indicators. Providing a framework for qualifications

and the methodology concept for supplier evaluation is one of the strategic objectives. It will introduce a set of factors related to human rights that must be considered in the supplier evaluation process, including:

- the geographical area (countries designated as highly risky),
- industry,
- presence in sanctions lists,
- checking good reputation.



# Material impacts, risks and opportunities and their interaction with strategy and business model (S2, SBM-3)

The table shows the material impact on workers in the value chain. No risks or opportunities have been identified.

Table 32

| ESRS topics                            | Subtopic            | Name  | Impact/ risk/ opportunity | Current/ potential | Time horizon | Place in the value chain   |
|--|---------------------|---|---------------------------|--------------------|--------------|----------------------------|
| S2<br>Workers<br>in the value<br>chain | Working conditions  |   |                           |                    |              |                            |
|  | • Health and safety | • Injuries resulting in incapacity for work of supplier’s employees | Negative impact           | Current            | S, M, L      | Own operations + suppliers |

This chapter applies to the persons performing work in the value chain and actively cooperating with the ORLEN Unipetrol Group. We expect our suppliers to assess their operations with respect to potential negative impacts and adopt measures to prevent such impacts, thereby mitigating any adverse environmental and social impacts of their activities. The information related to suppliers is gathered via questionnaires. We are engaged in many risk and opportunity management initiatives related to workers in our value chain. We implement procedures for a responsible acquisition of human resources.

### Impacts based on the strategy and business model

The double materiality assessment identified one current negative impact on workers in the value chain with respect to OHS. In the value chain context, value chain workers involved in operations, maintenance, and technical support, are most exposed to potential negative impacts associated with occupational health and safety.

### Relation between risks and opportunities arising from impacts related to value chain workers and our company’s strategy and business model (S2–10b)

We have not defined the relationship between risks and opportunities arising from the impacts because we view materiality from the perspective of one negative impact.

### Types of value chain workers who can be impacted by the undertaking

In the value chain, we include all entities with which we have a contractual relationship. As part of our double materiality assessment, we have the greatest impact on individuals performing work at our site locations who are not part of our own workforce. We are aware of the need of the ongoing evaluation of workers in our value chain who can be substantially impacted by our activities. The Code of Conduct for Suppliers outlines distinct expectations for suppliers and categorises them into three groups based on size: large companies (with over 250 employees), medium-sized companies (with 51-200 employees), and small companies (with fewer than 50 employees). We identify types of workers in our value chain:

- workers of third-party companies providing services to the entire ORLEN Unipetrol Group,
- suppliers and subcontractors,
- workers in transport and logistics,
- workers involved in the distribution and delivery of retail products.

We gradually take steps to ensure ethical workflows in the entire value chain. We also identify new challenges and restrictions associated with monitoring and controlling suitable working conditions for all workers in the value chain.

### The negative material impact concerns individual incidents related to OHS, which we differentiate as follows:

- employee injuries resulting in incapacity for work,
- injuries of workers in the value chain without incapacity for work,
- severe employee injuries – mass accidents and/or fatalities.



# Policies related to value chain workers (S2-1)

Our commitments are put into practice through the Code of Conduct for Suppliers, which was revised in 2024 and serves as a crucial tool for our collaboration with suppliers, including the process of supplier qualification and evaluation. All suppliers are required to be familiar with and accept the following documents: Code of Conduct, Human Rights Protection Policy, Anti-corruption Principles, Prevention of Unfair Practices, and Principles for Accepting and Offering Donations. We have set many ORLEN Unipetrol Group policies for managing material impacts, risks, and opportunities related to workers in our value chain:

- **Code of Conduct for Suppliers** – a document laying down ethical and social standards that we expect from our suppliers in areas like OHS, diversity, gender equality, social dialogue, fair wages, and prohibition of child and forced labour. It is used across the entire ORLEN Unipetrol Group as a tool supporting responsible and sustainable business practices throughout the entire value chain. It outlines the requirements for suppliers regarding the ethical and responsible conduct towards their stakeholders, employees, customers, and local communities, as well as respect for human rights and protection of the environment.
- **Human Rights Protection Policy** – creates a framework for ensuring respect for human rights throughout the entire organisation and in all relations with stakeholders, including suppliers. We expressly refuse forced and child labour.
- **Internal Anti-corruption Programme** – is integrated into business contracts to protect against corruption and conflict of interest; it includes the policy for receiving and giving donations at the ORLEN Unipetrol Group, and the contractual anti-corruption clause.
- **Occupational health and safety** – suppliers are required to adhere to all applicable OHS regulations and practices.
- **Contractual requirements** – provisions ensuring compliance with working time regulations, OHS standards, and the requirements for employee training and certification.
- **Integrated Management System** (IMS) – supports risk management processes and compliance with regulations, forming the way we monitor and manage risks related to workers in our value chain.
- **Whistleblower Protection Policy** – applies both to ORLEN Unipetrol Group employees and workers in the value chain and ensures a safe environment for reporting irregularities.

Certifying and complying with these documents by the potential suppliers is a mandatory prerequisite for participation in any procurement procedure. In an effort to continually improve our procurement processes, we focus on enhancing and increasing the consistency of our procurement procedures. We have a model for supplier qualifications. We regularly evaluate key suppliers within an assessment process. The evaluation criteria, based on proven market practices, help mitigate reputational, financial, and process risks, and ensure a high quality of cooperation with suppliers. Other measures to improve the procurement and risk-prevention processes include:

- duly prepared documentation,
- checklists in IT systems,
- process of reviewing and assessing contracts with suppliers within the meaning of held certificates and the safety clause,
- compliance with the principles of ethics and applicable laws while maintaining transparency and professionalism throughout the entire process of acquiring goods and services.

Our procedures are based on internal guidelines, national legislation, and internationally recognised frameworks, including:

- the Universal Declaration of Human Rights,
- Guidelines of the Organisation for Economic Cooperation and Development (OECD) for Multinational Enterprises,
- ILO Declaration (International Labour Organisation) on Fundamental Principles and Rights at Work,
- Performance Standards of the International Finance Corporation (IFC),
- ten UN Global Compact principles.



## Processes for engaging with value chain workers about impacts (S2-2)

We arrange training for suppliers that help them meet our expectations, including the implementation of responsible conduct at our sites. Suppliers are also informed about channels for anonymously reporting concerns via local grievance mechanisms. Employees of suppliers working at ORLEN Unipetrol Group locations undergo safety training before they commence their work.

We communicate our general procedures concerning impacts with key stakeholders via:

- the procurement platform **Connect** 
- ORLEN Unipetrol website,
- the intranet.


When engaging with workers in our value chain, we apply the following formal requirements:

- adoption of the Code of Conduct for Suppliers,
- confirmation of adopting the Human Rights Protection Policy,
- confirmation of adopting anti-corruption rules,
- including anti-corruption and sanction clauses in contracts.

Considering the material importance of safety in our production plants, directors supervising individual areas are responsible for continuously monitoring compliance with OHS regulations by suppliers and subcontractors through regular controls and inspections. It is a procedure for engaging with workers in the value chain.

## Processes to remediate negative impacts and channels for value chain workers to raise concerns (S2-3)

With workers in the value chain, we emphasise precautions and the enforcement of the safety culture. If any fault related to occupational safety is discovered, everyone has the right to intervene and report the given findings without any consequences. Therefore, we and our contractors can address the impact of the breach and learn from the given situation. We provide value chain workers with multiple channels to raise concerns. We also expect the suppliers working at our sites

or providing specialised staff to introduce or have introduced grievance mechanisms where workers can raise their concerns anonymously. When workers in the value chain are hired from the local community, suppliers can utilise community feedback mechanisms. Policies regarding the protection of persons are published in accordance with the chapter **Business conduct policies and corporate culture (G1-1)** .



# Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions (S2-4)

We realize that OHS management systems need not apply to workers of suppliers in the same manner as they do to employees. The staff of suppliers working on the premises of organisations in this industry may be less familiar with the workplace and the organisation’s OHS procedures. We work to implement new procedures for centralised supplier verification, which will also address methods for minimising the negative impacts on persons associated with our value chain. We also explore the option of ensuring or allowing remedies for impacts in relation to the actual material impact in the context of people performing work in the value chain.

We have introduced the Code of Conduct for Suppliers to clearly define the standards of conduct expected from our suppliers with respect to human rights, employee development, occupational health and safety, and anti-corruption activities. Each supplier cooperating with the ORLEN Unipetrol Group is required to adopt this Code. During the reporting period, we did not establish any material operating expenses (OpEx) or capital expenditure (CapEx) related to workers in the value chain.

# Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S2-5)

We aim to minimise the negative impact on workers in our value chain. As part of the tender procedures, suppliers are required to provide their consent to a set of documents that define the fundamental expectations related to sustainability. This includes the adoption of our Code of Conduct for Suppliers, a certificate of adopting and reviewing our policies

related to human rights and anti-corruption rules, and the consent to anti-corruption and sanction clauses in contracts. Our goal is to ensure that all suppliers adhere to these standards. Any progress is regularly monitored by those responsible for the contract performance.



# Affected communities (S3)

## Interests and views of stakeholders (S3, SBM-2)

Local communities are important stakeholders for the ORLEN Unipetrol Group. We engage with them through various communication channels, including initiatives focused on raising social awareness, ORLEN Unipetrol Foundation projects, community briefings, and partnerships with local governments and institutions. Respecting the rights of local communities, including human rights, is a crucial aspect of our operations.

## Material impacts, risks and opportunities and their interaction with strategy and business model (S3, SBM-3)

Below is a summary of the key impacts under ESRS S3, as they were identified during our double materiality assessment. No risks and opportunities have been identified.

Table 33

| ESRS topics                | Subtopic   | Name  | Impact/risk/opportunity | Current/potential | Time horizon | Place in the value chain |
|----------------------------|--|---|-------------------------|-------------------|--------------|--------------------------|
| S3<br>Affected communities | <b>Economic, social, and cultural rights of communities</b>            |   |                         |                   |              |                          |
|                            | <ul style="list-style-type: none"><li>• Soil-related impacts</li></ul> | <ul style="list-style-type: none"><li>• Negative impacts of ORLEN Unipetrol operations on neighbouring municipalities - noise, luminous smog, smell</li></ul> | Negative impact         | Current           | S, M, L      | Own operations           |
|                            | <b>Supplementary topic: Community support</b>                          | <ul style="list-style-type: none"><li>• CSR projects - ORLEN Unipetrol Foundation, incl. support of technical education</li></ul>                             | Positive impact         | Current           | S, M, L      | Own operations           |

Our current business model has an impact on the communities in which we operate. The industrial nature of the ORLEN Unipetrol Group has a direct impact on the communities located near its facilities. It includes the following impacts:

- negative – our activities can be a source of nuisance, such as noise, smell or light pollution,
- positive – we contribute to developing communities through charitable initiatives, including support for educational programmes.



**Characteristics of affected communities and description of impacts**

The affected communities are defined as local inhabitants living in the immediate vicinity of our production plants.

A village or town within 20 km of our company’s production facilities and locations is a typical example of this community.

We do not impact communities in the place of oil extraction because we purchase crude oil via our parent company, ORLEN S.A., in Poland. Yet, we can expose communities around our production units to negative impacts.

In connection with the positive impacts resulting from our support for communities through initiatives that extend beyond the local level, the characteristics of communities also apply to beneficiaries of broader, often nationwide programmes.

We pay special attention to:

- supporting education,
- employee volunteering,
- environmental protection projects,
- cultural and sports projects.

We actively shape and manage our relationships with communities, preferring open dialogue, operational transparency, and measures to mitigate negative impacts.

**Policies related to affected communities (S3-1)**

The central policies governing our relationships with local communities include:

- **Public affairs policy for regional relationships** – ensures that our business activities are conducted responsibly with regard to the needs of local communities in the areas where we operate. This policy was created to ensure transparent regional coordination of Public Affairs at the ORLEN Unipetrol Group. By implementing this policy, we want to fulfil the role of a responsible entrepreneur, good neighbour, and member of the local community to the best of our abilities. We aim for our relationships with local communities to be founded on partnership, honesty, respect, and trust, rooted in our openness to the needs of the environment in which we are active. The social context is equally important as economic conditions, which is why we feel responsible for supporting our neighbours.
- **Human Rights Protection Policy** – creates a framework for ensuring the respect for human rights, which addresses the broader engagement of stakeholders.

- **Policy of charitable activities of the ORLEN Unipetrol Group** – sets out the rules for providing, using, and accounting for donations. It also identifies priority areas for engaging the community and provides a strategic direction for our initiatives focused on community support. The ORLEN Unipetrol Foundation is responsible for charitable activities.

In addition to the policies described above, we have also implemented special regulations for managing infrastructure safety in the event of emergencies or safety incidents. The regulations are designed to minimise environmental damage, mainly damage to the inhabitants of areas near our production sites. These documents apply equally to all groups or categories of affected communities and do not discriminate against any of them.



# Processes for engaging with affected communities about impacts (S3-2)

We manage our relationships with local communities, including local inhabitants, their organisations, local authorities, and institutions. These initiatives focus on raising social awareness, the ORLEN Unipetrol Foundation programmes, briefings with the community, and partnerships with local governments and institutions. The Public Affairs section director and the ORLEN Unipetrol Foundation director are responsible for supporting and maintaining strong relationships with local communities. These positions guarantee that our business targets are effectively aligned with social objectives. As part of our broader commitment to supporting communities, including local communities, we actively engage with stakeholders through various communication channels. We regularly receive questions and correspondence from local authorities, civil society organisations, and inhabitants regarding the support of social initiatives. We thoroughly review these needs and respond to them in accordance with our internal protocols. We use transparent communication to inform local communities about our activities, and they can also influence and contribute to initiatives focused on the community, which supports engagement and joint efforts for regional development.

There is a mutual communication channel maintained by the regional specialist of the ORLEN Unipetrol Group for public relations. If the representatives of the affected community express their views, this company employee records them and communicates with the said representatives. These views are then submitted to the Public Affairs director, and if they are of a serious nature, they are submitted to the Board of Directors. We regularly communicate with all municipalities. The efficiency of the collaboration is usually evaluated every quarter by a regional public affairs specialist.



# Processes to remediate negative impacts and channels for affected communities to raise concerns (S3-3)

We gradually take steps to mitigate the negative impacts of our activities on local communities. We strive to prevent situations that could cause operational inconvenience or disruption. If any such impacts occur, we aim to minimise them to the greatest extent possible. If the negative impacts cannot be fully eliminated, we introduce remedial and compensatory measures. We closely cooperate with local communities and assume responsibility for any inconvenience or losses that may be caused, such as damage to property. All impacts on the surroundings, including flaring, noise, or luminous smog, are addressed systematically and in accordance with applicable legislation. We have created an email address for communication with the public, where anyone can turn to and raise requirements or complaints: [regionalni-publicaffairs@orlenunipetrol.cz](mailto:regionalni-publicaffairs@orlenunipetrol.cz) or [info@orlenunipetrol.cz](mailto:info@orlenunipetrol.cz).

When communicating with the public:

- we apply CSR principles towards towns and municipalities and communities in the vicinity,
- inform about the company’s impact on the environment near our production sites through our representatives’ participation in public meetings of councils of our neighbouring municipalities,
- we meet with mayors of municipalities close to our production sites and inform them about all our environmental activities and any non-standard operational situations,
- we engage in internal communication with our employees via the internal GO! magazine, the intranet, email communication, and events for employees,


- we are in contact with the Police of the Czech Republic and the Municipal Police for the needs of alarms within the corporate alarm system,
- we send crisis text messages using an information channel,
- we operate alarm and warning signalling and audio systems at our production sites and in their vicinity,
- we provide information to the public via the Ecological Centre in Most and Ecological Centre in Kralupy nad Vltavou,
- we collaborate with Saxony within a joint working group,
- we develop interactive and educational programmes for primary and secondary school students,
- our sales representatives are in permanent contact with our customers,
- we receive feedback through employee satisfaction surveys and a dialogue with stakeholders,
- our employees can contribute their views and evaluate events at the company using an internal forum,
- we engage in a dialogue with national and European supervisory and regulatory bodies,
- we conduct well-organised debates both with academic institutions and non-governmental non-profit organisations (NGOs),
- we use the internet and the following social media for communication: Facebook, X (Twitter), Threads, Instagram, LinkedIn, TikTok, and YouTube.

We monitor the effectiveness of all channels by tracking the number of submissions and complaints received. The selected channels for reporting ensure anonymity and protect informants against potential retaliation.



# Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions (S3-4)

We have a material impact on the development of communities not only near our production sites, but also throughout the Czech Republic. In 2024, we were named the Employer of the Year in the Ústí Region and also hold the prestigious global award, Top Employer, which again ranked us among the best employers in Europe. We place great emphasis on regular exchanges of information with our stakeholders to learn their views and concerns; we communicate about our activities in a transparent manner. That helps us mitigate the impact potential in a timely manner. Health and safety are our top priority. Anyone can contact us and provide feedback. We aim to be a good neighbour who is actively and consistently involved in supporting and developing the community life. We focus on projects associated with the environment, occupational health and safety, and education in the natural sciences. We monitor the social and environmental impacts of our activities in the locations where we operate. We communicate the impacts of our activities in a transparent way with the local stakeholders in all areas of our business.

We support the development of local talents through many educational programmes focused on students in various education stages and through our partnership with universities. **ORLEN Unipetrol Foundation’s programmes** 

- Grant Programme for Schools
- Grant Programme for Teachers
- Scholarship Grant Programme
- fire prevention programme
- Magic Chemistry Competition
- A Wonderful Day with Chemistry
- Plastik a jeho kouzelný kufřík
- Show Chemistry competition
- Student Scientific Conference
- Stocking the Rivers Bílina and Elbe with fish
- Collaboration with the Czech Beekeepers Union
- Fridays with Science
- support of other non-profit organisation promoting education



# Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S3-5)

The management of negative impacts targets

- the implementation of state-of-the-art technological solutions,
- the implementation of investments supporting the local development,
- the organisation of educational and public-awareness campaigns to raise the awareness about our pending projects,
- maintaining an open and continuous dialogue with local communities and their representatives,
- thorough analyses of the locations of our planned projects,
- supporting collaboration between the teams responsible for investment planning and development.

Positive impacts are promoted through the CSR objectives of the ORLEN Unipetrol Foundation. It focuses on talented students, schools, and leaders in their activities and development. The aim is to conduct individual activities ethically and responsibly, continuously develop us and others, and support projects for our employees on a long-term basis. It focuses on all levels of education, addresses environmental protection, and develops relationships with the communities associated with the area and location, where we do our business. The Foundation’s activities have a significant impact both on the regions where our businesses are located and on our regions in general. It popularises science, primarily the natural sciences and technical disciplines. We want to attract younger generations to chemistry. As part of our activities, children and students can try out various options of dealing with situations. More information about the Foundation’s activities in the past year: [ORLEN Unipetrol Foundation](#)

Fig. 16

|  Education |  |  Community support |   |  The environment |  |
|--|--|--|---|--|--|
| Grant Programme for Schools<br>CZK 2,923,000 / 46 supported entities                         | Scholarship Grant Programme<br>CZK 567,000 / 45 supported entities   | Donations to towns and municipalities<br>CZK 3,700,000 / 28 supported entities                         | Grant programme for voluntary firefighters<br>CZK 1,012,000 / 14 supported entities | ČSOP<br>CZK 200,000 / 1 supported entity   | Czech Beekeepers Union<br>CZK 50,000 / 1 supported entity                                |
| Grant Programme for Teachers<br>CZK 405,000 / 22 supported entities                          | Student Scientific Conference<br>CZK 120,000 / 19 supported entities | Sports scholarships<br>CZK 483,000 / 73 supported entities   | Sports clubs<br>CZK 300,000 / 10 supported entities                                 | Czech Anglers Union, local organisation in Most<br>CZK 50,000 / 1 supported entity                   | Czech Anglers Union, local organisation in Neratovice<br>CZK 82,000 / 1 supported entity |
|  |  | komUNIta<br>CZK 1,378,000 / 53 supported entities  | Fulfilled Wishes<br>CZK 327,000 / 7 supported entities                              | Czech Anglers Union, North Bohemian Unit<br>CZK 80,000 / 1 supported entity                          | ALKA Wildlife – peregrine falcons<br>CZK 138,000 / 1 supported entity                    |
| CZK 4,015,000<br>Total sum   |  | CZK 7,200,000<br>Total sum   |   | CZK 600,000<br>Total sum   |  |
| 132<br>No. of supported entities   |  | 185<br>No. of supported entities   |   | 6<br>No. of supported entities   |  |



# Consumers and end-users(S4)

## Interests and views of stakeholders (S4, SBM-2)

Our strong focus on customer satisfaction and high-quality services, combined with innovations, strengthens our leading market position. Customers of our ORLEN filling stations include:

- B2C customers (Business-to-Customer) – individuals using the company’s products and services for their own non-business needs. These customers purchase fuels, utilise the offer of refreshments, and buy supplementary products or services (e.g., car wash or e-mobility). They make payments using the ORLEN fuel card designed for individuals, bank cards or cash.
- B2B customers (Business-to-Business) – legal entities or individuals doing business using the company’s products or services based on the registration of their registration number (IČO). These customers take fuels and other services either directly or through their employees or drivers. They use either ORLEN fuel cards or fleet cards from other companies to cover these transactions, or they use standard means of payment, such as cash or bank cards.

We emphasise understanding and satisfying the needs of consumers and end-users, giving appropriate consideration to applicable legislation, in particular consumer rights. This approach is based on the assumption that each aspect of the ORLEN Unipetrol Group’s activities, from product development to customer services, should be designed to provide customers with value and satisfaction. We are committed to providing top-quality products and services, and we strive

to maintain the highest standards possible. In our retail network, we introduce various accessibility improvements to enhance the customer experience of people with disabilities. Such measures include low-threshold access ramps at filling stations, dedicated parking bays, barrier-free bathrooms, and the option to pay for fuel from the car’s infotainment system using the ORLEN mobile app. Selected filling stations offer self-service stands or dedicated special lanes for trucks to accelerate refuelling and customer payments. Other types of equipment include charging points for portable electronics at internal seats and outside eating zones for relaxation. At filling stations in popular tourist destinations, we have installed bike stands that offer tools to repair and pump up their bikes, if needed.

We expand our digital offer and provide customers with convenient and user-friendly tools, including a customer portal and mobile apps ORLEN and Mycí digi linka. These solutions offer many features, such as payments at the stand, payments from the car’s infotainment system, a chatbot, connection to the customer service line, a comprehensive overview of the customer account – especially a summary of transactions, limits, cards, and invoices, an overview of the account status within the loyalty programme, and other pro-customer functionalities.



## Material impacts, risks and opportunities and their interaction with strategy and business model (S4, SBM-3)

We have not identified any negative impacts and risks within the double materiality assessment process.

Table 34

| ESRS topics                    | Subtopic  | Name   | Impact/risk/opportunity | Current/potential | Time horizon | Place in the value chain   |
|--------------------------------|---|--|-------------------------|-------------------|--------------|----------------------------|
| S4<br>Consumers and end- users | Social integration of consumers and/or end- users <ul style="list-style-type: none"><li>Access to products and services</li></ul> | <ul style="list-style-type: none"><li>We ensure non-stop availability of goods and services</li><li>Installation of EV charge points</li></ul> | Positive impact         | Current           | S, M, L      | Own operations + customers |
|                                |   |  | Opportunity             | Current           | S, M, L      | Own operations + customers |
|                                |   |  |                         |                   |              |                            |

The key challenges regarding our long-term growth include the rapid pace of technological progress, growing pressure on digitalization, the adoption of new business models and trends, intensive efforts to improve the energy efficiency, diversification of energy sources, and the decarbonization process. These factors, taken together, create both growth opportunities for the installation of EV charge points and a positive impact on the availability and quality of our services. Convenience (non-fuel) sales currently make up about 40% of the total sales volume of the ORLEN network. Therefore, we

see significant growth potential in this segment. The Stop Cafe concept is available at 347 out of 439 filling stations, and we plan to expand it further and innovate it. We develop the offer of private brands with an emphasis on the quality, composition, and added value of products. We emphasise modern and functional design supplemented with relaxation zones featuring Wi-Fi and invest in state-of-the-art technological solutions.



# Policies related to consumers and end-users (S4-1)

The ORLEN Unipetrol Group performs its activities in full compliance with applicable legislation in the Czech Republic and the EU law. With respect to consumers and end-users, we, in particular, observe the following laws and regulations: Consumer Protection Act, Act on Prices, Act on the Significant Market Power and Unfair Business Practices, Act on Fuels, Energy Act, and the Civil Code of the Czech Republic.

We respect and implement the requirements arising from the EU law, in particular: the EU Consumer Rights Directive, the EU Directive on Certain Aspects Concerning Contracts for the Sale of Goods, the EU Directive on Certain Aspects Concerning Contracts for the Supply of Digital Content and Digital Services.

Regarding personal data, we adhere to the standards established by the General Data Protection Regulation (GDPR) and the guidelines provided by the Personal Data Protection Office. Our approach to human rights is based on internal guidelines, national laws and regulations, and internationally recognised standards and directions. They include:

- the Universal Declaration of Human Rights,
- the ILO Declaration on Fundamental Principles and Rights at Work, based on key ILO conventions,
- the UN Guiding Principles on Business and Human Rights – Protect, Respect, Remedy framework,
- the OECD Guidelines for Multinational Enterprises,
- performance standards of the International Finance Corporation (IFC),
- ten principles of the UN Global Pact.

We ensure respect for human rights in both our own operations and in our business relations. We follow a human rights protection policy that emphasises our commitment to avoiding any actions that could violate human rights, whether internally among employees or externally, along the entire value chain. During the reporting period, we did not record any serious human rights problems or incidents involving consumers or end-users in the ORLEN Unipetrol Group that would violate 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. We are committed to ensuring that our products and services meet all requirements; we constantly improve safety in the workplace and meet the personal data protection requirements. The responsibility for developing and implementing policies in the key areas, such as privacy, freedom of expression, access to information, health and safety, protection of children, prohibition of discrimination, access to products and services, responsible marketing practices, and food safety, is vested in the Group’s Board of Directors. Our organisation has in place a broad scale of policies, including:

- **Integrated Management System Policy** ↗
- **environmental policy** ↗
- **public affairs policy for regional relations,**
- **Human Rights Protection Policy** ↗
- **information protection policy,**
- **policies applicable to charitable activities,**
- **policies for personal data security.**

These policies broadly apply to all consumers and end-users, although specific solutions can be adapted to target specific groups, such as filling station customers, mobile app users, or retail customers in e-commerce channels.



## Processes for engaging with consumers and end-users about impacts (S4-2)

We employ a wide range of methods to understand customer needs and preferences. Regular market surveys and public opinion polls are key tools that provide insight into customer expectations regarding our products and services. This survey is conducted regularly across our retail markets and provides trend-based information. In addition, we have a satisfaction survey programme in place in our retail network, which records customer experience using the Net Promoter Score (NPS) index and satisfaction evaluations within specific aspects of filling station performance. The evaluated areas include staff courtesy, speed of the operating staff, employee competencies, and cleanliness of the free space, filling station furnishings, and bathrooms.

We expand payment options. We have introduced the option to pay using the ORLEN app, displayed on the onboard screen inside the car. This feature is fully compatible with Apple CarPlay and Android Auto, enabling drivers to complete their payments without needing to interact with the payment terminal.

We conduct our marketing activities in accordance with ethical standards and in consideration of consumer rights and needs. Our promotional campaigns are designed to be transparent and avoid misleading information. Special attention is given to ensuring the social responsibility of marketing content, which should not encourage inappropriate behaviour. The promotional conditions for each campaign are published on our website. If we discover any violation of responsible marketing practices, we reserve the right to discontinue the campaign.

## Processes to remediate negative impacts and channels for consumers and end-users to raise concerns (S4-3)

As part of our customer care services, we offer multiple channels for addressing customer complaints and requests. We regularly evaluate the quality of answers to customer requirements. Each month, we check a random sample of answers, and conclusions from their analysis are used to improve the quality of services. Quality assurance is also an integral part of telephone contact centre operations. Random checks of calls and weekly operational meetings enable the team to promptly implement necessary remedies. In the case of any potential violation of consumer rights, including the issues related to the freedom of expression, access to information, personal safety, protection of children, prohibition of discrimination, access to products and services, or responsible marketing practices, we ensure that customers have access to various reporting channels, including:

- online forms for complaints and feedback on the website of the ORLEN Group,
- telephone contact details,
- dedicated email addresses,
- traditional mail sent to the companies' addresses,
- official social media profiles,
- personal reports of problems and complaints at filling stations or in customer service offices,
- webchat.



# Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions (S4-4)

One of the strategic objectives of decarbonization is to build an infrastructure for alternative drives. We plan to develop an extensive network of charging stations. We are introducing HVO sales at selected motorway sites for freight transport. We seek to expand our product offering beyond fuels. These steps aim to solidify our market position amid a stable demand for conventional fuels and growing demand for alternative fuels, allowing us to provide an integrated offering that includes direct sales of energy with low or zero carbon emissions. To ensure corresponding profitability and minimise the risks associated with non-optimal capital allocation, including the risk of potential bound emissions, the ORLEN Group has adopted differentiated minimum return rates, calibrated for specific project types and the related costs of financing. Two main threshold values were defined for the return on investment:

- projects for maximising the value – minimum rate of 10-12%,
- innovative and sustainable product projects – minimum rate of 7-9%.

E-mobility will play an increasingly important role in both personal mobility and mass transportation of people and goods. We offer 294 EV charge points at 72 filling stations, and we continue to expand and modernise this network.

# Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S4-5)

To enforce positive impacts, we introduce principles focused on ensuring a safe use of our products and services. At the same time, we aim to enhance consumer and end-user satisfaction and reinforce the ORLEN brand as a socially responsible brand. We set our objectives based on an analysis of national and international regulations, market trends, and suggestions from stakeholders. This approach ensures that our steps align with current market needs and specific local circumstances. To ensure our positive impact on consumers and end-users, we continually develop communication tools that enable our customers to share feedback on our products. We also integrate the communication mechanisms into sales and customer processes throughout the entire retail network. We also plan to expand our network through a franchising model, which

we view as a significant opportunity to increase the number of filling stations. At the same time, we are developing the concept of self-service filling stations, ORLEN Express, which is primarily suitable for locations at shopping malls.

The objectives regarding the management of material opportunities focus on expanding the e-mobility infrastructure. In addition to the existing charging stands provided by external partners, we are developing our own fast-charging infrastructure. By 2030, we want to install 900 fast-charging points.



# 04

## COMPANY GOVERNANCE


Business conduct





# Business conduct (G1)

## The role of the administrative, management and supervisory bodies (GOV-1)

The ORLEN Unipetrol Group is aware of its responsibility towards all stakeholders, including customers, business partners, the sole owner, employees, and other relevant parties. ORLEN S.A. is the company’s sole owner, ensuring the key governance pillars and supervision over the ORLEN Unipetrol Group’s conduct. Together with our management bodies, it establishes a system that provides a high level of integrity and transparency. Additional information is given in the section **Role of the administrative, management and supervisory bodies (GOV-1)** .

## Description of the process to identify and assess material impacts, risks and opportunities (G1, IRO-1)

As part of the double materiality analysis, we have identified material topics specified in the table below.

Table 35

| ESRS topics         | Subtopic  | Name  | Impact/ risk/ opportunity | Current/ potential | Time horizon | Place in the value chain               |
|---------------------|---|---|---------------------------|--------------------|--------------|--|
| G1 Business conduct | Management of relationships with suppliers, incl. payment practices | <ul style="list-style-type: none"><li>Effective system of supplier selection and evaluation</li></ul> | Positive impact           | Current            | S, M, L      | Own operations + suppliers             |
|                     | Corruption and bribery  |   |                           |                    |              |  |
|                     | <ul style="list-style-type: none"><li>Incidents</li></ul>           | <ul style="list-style-type: none"><li>Procedures in place to prevent and detect corruption</li></ul>  | Positive impact           | Current            | S, M, L      | Own operations + suppliers + customers |
|                     | Supplementary topic: Cybersecurity                                  | <ul style="list-style-type: none"><li>Risk associated with fraudulent cybersecurity</li></ul>         | Risk                      | Current            | S, M         | Own operations                         |



# Business conduct policies and corporate culture (G1-1)

**Responsibility, development, people, energy, and reliability** – these values define the direction we pursue to achieve the goals defined in the **ORLEN Strategy 2035**. One of the objectives reflects the ethical principles and corporate culture. At the organisational level, at the team level, and individually, we recognise the need to continually improve our professional conduct. Our expectations and motivations will change and affect the working environment. We have a dedicated employee responsible for coordinating all ethical issues. This employee also organises training activities related to ethical issues through internal corporate media and other initiatives focused on building awareness about and promoting ethics among employees.

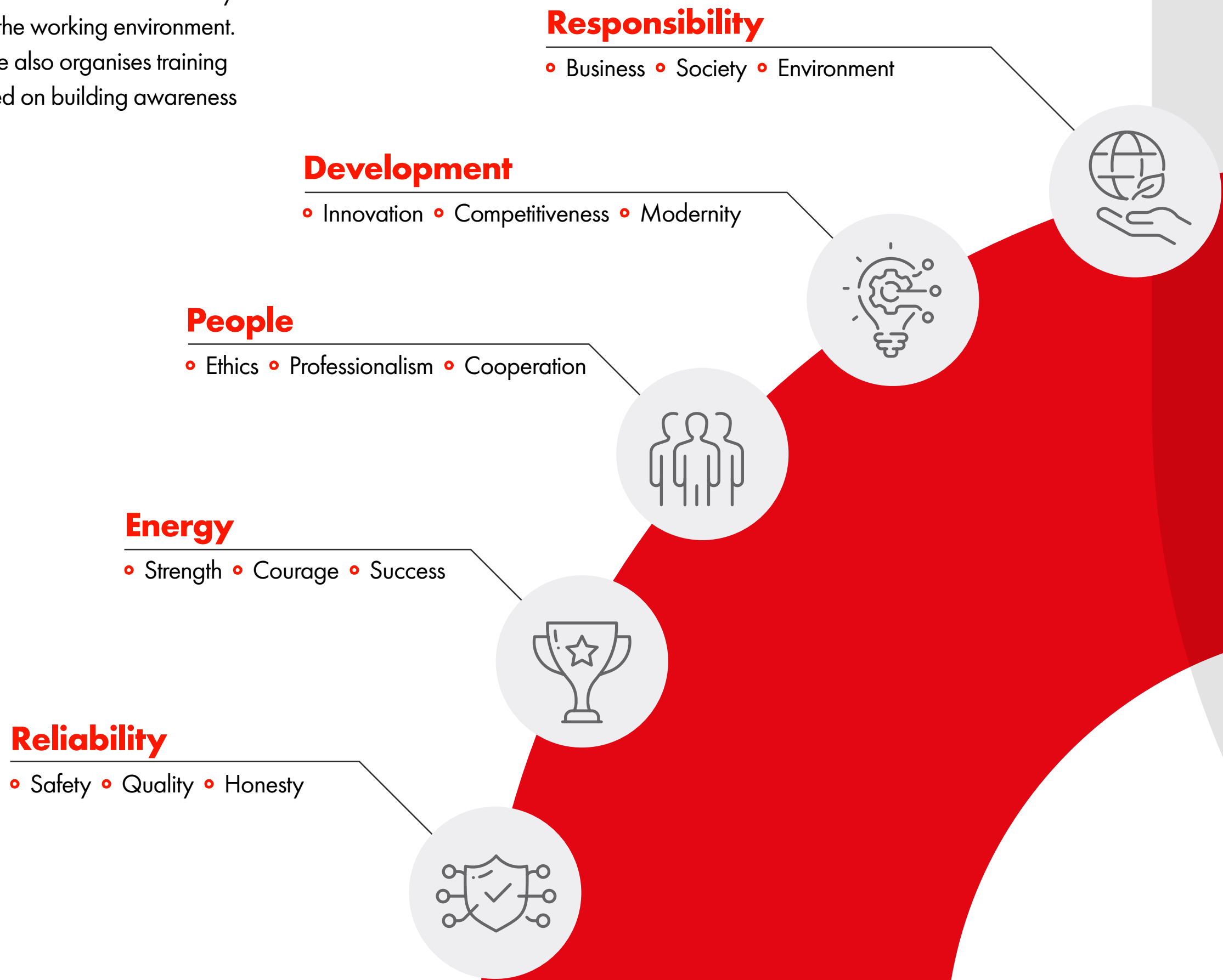


Fig. 17



Every three years, we conduct an employee satisfaction survey to gather insights into what matters to them, what motivates them in their everyday work, and what we can change to further encourage an ethical working environment that is even better and more effective. Participating in the survey is voluntary and anonymous. The survey results are published in internal media.

- **Code of Ethics** – directions defining the ethical standards applicable to all employees with regard to the values of the ORLEN Unipetrol Group. The Code also determines our position regarding the applicable ethical principles and standards, the current scope of operations, and the operational strategy, expectations towards our business environment, and best practices in business ethics.
- **Human Rights Protection Policy** – key standards of behaviour and regulations valid in our Group and directly or indirectly governing human rights protection within the organisation and its relations with external stakeholders.
- **Whistleblowing** – in the case of any suspected unfair behaviour, it is possible to contact the ethical standards ombudsperson or, under the Act on the Protection of Whistleblowers, we have an anti-fraud department. Its task is to unveil, discourage, investigate, and sanction fraudulent/corruption risks and practices.
- **Internal Anti-corruption Programme** – it includes policies for accepting and giving donations, process monitoring, anonymous reporting, supplier verification, declaration of independence, and contractual anti-corruption clauses. Training focused on preventing corrupt behaviours and the Code of Ethics and company values is part of the initial training for employees and partners. In fuel wholesale, no corrupt behaviours are possible thanks to standardised contracts and price calculations for customers based on a matrix.
- **Code of Conduct for Suppliers** – is related to supply chain management, procurement processes, and systems.

**Description of mechanisms concerning breaches of the Code of Ethics**

The values, principles, and standards outlined in the Code of Ethics apply to each and every ORLEN Unipetrol Group employee, regardless of their job position or contract form. Although some rules of conduct may not apply to the specifics of a given position, the employee is not relieved of the duty to respond to violations of the Code of Ethics or report them. Information about breaches of internal regulations follows a specific reporting and administering procedure. It all depends on the scope of the problem, the complexity of the case, and the level of trust of those involved. Suspicions of violations of applicable standards, values and standards of conduct, or a request for an explanation of ethical dilemmas, can be reported to:

- the manager,
- the ethical standards ombudsperson,
- the Control and Safety Unit via an anonymous reporting system.

**Model for reporting and assessing questions, concerns, and violations of values and behaviour standards**

How to report an inquiry, concern or fault regarding the fundamental values or standards of the ORLEN Unipetrol Group:

| VARIANT 1   |
|---|
| If you wish to report an inquiry, concern or violation of the fundamental values or standards of the ORLEN Unipetrol Group, contact your immediate supervisor first.  |
| VARIANT 2   |
| If serious reasons prevent you from turning to your manager, contact our ethical standards ombudsperson.  |
| VARIANT 3   |
| If there are any serious reasons preventing you from contacting the ethical standards ombudsperson, contact the HR director.  |
| VARIANT 4   |
| You can submit your report (also anonymously) directly to the Safety and Control Division, using a special reporting channel, as is described in the Internal Anti-corruption Programme of the ORLEN Unipetrol Group. |



## Management of relationships with suppliers (G1-2)

We integrate responsible business into the management of relationships along the entire supply chain. We focus on developing processes to ensure responsible procurement, with an increased emphasis on the high-risk parts of the supply chain. We view the supply chain as an extremely important topic, and we strive to provide the same high-quality sustainable information for the supply chain in the future as we do for our own activities.

We want our suppliers to act in compliance with our values, ethical standards, and legal requirements. **All suppliers are required to be familiarised with and accept the Code of Conduct.** Confirming this document and adhering to its provisions are a mandatory prerequisite for cooperation. The detailed criteria, as described in the Code, address key aspects of environmental, social, and corporate governance issues. We have an internal policy in place that regulates payment practices, including standard terms of payment, which are aligned with market standards relevant to each of our business segments.

## Prevention and detection of corruption and bribery (G1-3)

We structure the anti-corruption process as a cycle of interconnected activities, including four stages: prevention, identification, verification or control, and calibration. Building awareness about the fight against corruption is a fundamental part of this framework. The anti-corruption measures are set in an internal anti-corruption programme. It includes principles for receiving and giving donations, monitoring processes, anonymous reporting, supplier screening, declaration of independence, and the contractual anti-corruption clause. Our employees and contractors regularly participate in training sessions focused on preventing corruption behaviours. The anti-corruption clause is part of the contracts made with suppliers.

If there is any suspicion regarding unfair conduct, everyone can turn to the ethical standards ombudsperson or report any wrongdoing (whistleblowing) under the Act on the Protection of Whistleblowers. The principles of the whistleblowers' protection were implemented in January 2024. We proceed in accordance with Act No. 171/2023 Sb. and the rules for whistleblower protection and reporting of infringements valid for the ORLEN Unipetrol Group. Reports can be submitted:

- through an internal reporting system described in the internal anti-corruption programme,
- directly in person or by email to five trained persons,
- through an external reporting system administered by the Ministry of Justice, or directly to the competent public authorities.

Regarding suppliers, we identify areas that reduce the emission footprint of our products. They include

- exit from Russian oil. The original Rebco oil was replaced with a mix of CPC Blend, Arab Light, Johan Sverdrup,
- purchase of renewable electricity, including the guarantee of origin,
- purchase of raw materials for petrochemistry with a lower emission footprint or with a high share of recycled origin, e.g., renewable fuel HVO (made from various vegetable oils and waste oils) or pyrolysis oil from plastic waste.

The evaluation criteria, based on best market practices, help mitigate reputational, financial, and process risks, ensuring a high quality of collaboration with suppliers. Other measures to improve procurement and risk-prevention processes include duly processed documentation, checklists in IT systems, a process of reviewing and assessing contracts with suppliers as required by the certificates held, and security clauses. Goods and services are acquired in accordance with ethical principles and applicable legislation while maintaining transparency and professionalism throughout the entire process.

Employees are trained in whistleblowing issues through e-learning. The training entitled "Prevention of corruption behaviours" and the Code of Ethics and company values are also part of the initial training of employees of our partners at filling stations.

Table 36

|   |     |
|---|-----|
| Number of people trained during the reporting period – <b>management and risk functions</b>         | 628 |
| Number of people trained during the reporting period – <b>administrative and supervisory bodies</b> | 21  |



# Confirmed incidents of corruption or bribery (G1-4)

We promote a zero-tolerance approach towards bribery, corruption, and fraud. We have in place system measures, including training, a limited value of donations, and a system of contracting rules. In 2024, we did not record any confirmed incidents of bribery or corruption; none of our own employees were dismissed or punished due to corruption or bribery incidents. We do not record any incidents related to contracts with business partners.

# Political influence and lobbying activities (G1-5)

With their activities, ORLEN Unipetrol Group representatives are involved in professional organisations and associations (Confederation of Industry of the Czech Republic, Association of Chemical Industry of the Czech Republic, Chamber of Commerce of the Czech Republic, etc.). We do not provide any financial contributions to political parties, movements, or organisations. We adhere to the highest standards of transparency; we are not affiliated with any political group; and we do not support any actions taken by political parties or movements. Our collaboration with authorities is based on expertise, correctness, transparency, and mutual respect. Any civil or political engagement of our employees must not harm the good reputation of the ORLEN Unipetrol Group. **Our employees must refrain from any conflicts of interest or activities that may compromise their work and responsibilities. We require our suppliers to comply with the Code of Conduct for Suppliers, which, among other things, encourages suppliers to combat all forms of corruption in their economic activities and implement necessary precautions.** The benefits of membership in professional and sector organisations primarily include the opportunity to gain insights,

discuss draft normative acts in the Czech and European markets, gain access to survey results and technical solutions, as well as to share knowledge and acquire new experiences. Being active in these organisations is a way of building lasting relationships with others, primarily those promoting the concept of responsible business. Strategic organisations and associations are primarily entities that associate and represent the entire refining, petrochemical, gas, chemical, and energy industry at the national or European level. These organisations represent the industry before state administration bodies and international organisations. ORLEN Unipetrol Group representatives are members of the associations that are published on our website: [ORLEN Unipetrol](#).

# Payment practices (G1-6)

ORLEN Unipetrol RPA offers standard payment terms of 21 to 90 days. The average time that we needed to pay invoices, calculated as a weighted arithmetic average from the date of commencing a contractual or statutory payment time limit, was 18.36 days. The variety of the applied payment terms reflects the scope and complexity of our operations, including the cooperation with suppliers from many countries across various industries, as well as the different legal and regulatory

environments in which we operate. We determine payment terms based on the type of goods or services purchased, as well as the specific requirements and operational needs associated with our valid contracts.

We did not record any overdue obligations by the end of 2024. Payments are made in accordance with the general terms of business and master contracts.



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