

INFORMATION
for Participants of the procurement procedure
regarding the participation of an economic security expert

In accordance with the decision of the Executive Director for Control and Security ORLEN S.A., pursuant to § 24.4, § 26.11 and § 27.7 of the Procurement Instructions at ORLEN S.A., a economic security expert will be involved in the proceedings.

The Expert's tasks include monitoring the course of the procurement procedure and identifying irregularities that may cause damage to the economic interests of ORLEN S.A. or Companies from the ORLEN Group. The Expert shall report any irregularities found to the Executive Director for Control and Security to undertake appropriate follow-up actions.

The Expert shall co-operate with Purchaser – Leader of the Procurement procedure, with regard to the exchange of an information on identified deviations from procedures described in the internal organisational laws, and above all in the Procurement Instructions. It is also up to the Purchaser to what extent and at what stage of the Procurement procedure the Bidders will be verified to mitigate the risks resulting from co-operation with them.

The Procurement Team should have the same knowledge about the activities undertaken in the procurement procedure. At the same time, disclosure of information from the procurement procedure to persons other than the Participants of the Procurement Team may be considered an irregularity if its disclosure had an impact on the choice of the Supplier. The Procurement Team should ensure equal access to information and equal treatment of all Bidders, as well as document key decisions, opinions, negotiations, agreements, deviations from the procedure and other activities in the Connect Purchasing Platform, which affect the selection of the criteria determining the final selection of the subject of the contract or the Bidder.

Each Participant of the Procurement procedure may report any irregularities directly to the Expert. They may also submit their comments via email: anonim@orlen.pl, a dedicated application: <https://aszn.orlen.pl>, drop-box mailboxes in the main passageways in ORLEN S.A. buildings in Płock and in Warsaw, a secure helpline at 0 800 322 323, as well as anonymously via traditional post to the address of the Executive Director for Control and Security, with the annotation “*Do rąk własnych*” [Personally to the addressee]. A whistleblower may be protected against retaliation and confidentiality of personal data in accordance with the adopted rules: [Anonymous Whistleblowing System \(ASZN\) \(orlen.pl\)](#).

During contacts with Contractors, Participants in the Procurement procedure may encounter situations in which they are offered various kinds of gifts or benefits. To avoid doubts regarding the acceptance or giving of gifts, please refer to the applicable [Gift Policy](#). Each

Participant of the procurement procedure may register a gift in a dedicated application: <https://rejestrkorzystosci.orient.pl/>, which protects him against the consequences of possible slander.

Corrupt situations may arise in relations with Contractors, therefore Participants in the procedure should read the '[Anti-corruption policy at the ORLEN Group](#)', which will make it easier to identify risky situations and prevent crime. Each trade agreement is accompanied by an anti-corruption clause, the current version of which is placed in the clauses repository in the Dok-System.

If the Participant of the procedure identifies links with the Bidders' employees, as defined in the 'Policy for detecting and managing conflicts of interest at ORLEN S.A.', he should inform his supervisor in accordance with its provisions. Not every situation that initially appears to be a conflict of interest is negative. It is the supervisor who assesses the influence of the connections on the ongoing activities and can manage it, leaving the employee in the procedure. The submission of a statement on the identified links protects the Participant against false accusations of influencing decisions in their own interest, and not in the interest of ORLEN S.A. All statements in this regard should be objectively verified also by superiors, and decisions taken in the event of a conflict of interest should protect the interests of ORLEN S.A.

The economic security expert is obliged to provide all Participants of the procurement and Bidders – through the Purchaser – with information on the above-mentioned regulations.

Executive Director for Control and Security ORLEN S.A.