

THE PRINCIPLES

OF ACCEPTING AND PRESENTING GIFTS AT PKN ORLEN S.A.

The principles of accepting and handling out gifts at PKN ORLEN S.A. were implemented by the decree of the President of the Management Board of PKN ORLEN S.A., the 14th of February 2019.

Main principles of accepting gifts in PKN ORLEN S.A.

- The principles apply to employees of PKN ORLEN S.A. and persons representing PKN ORLEN S.A. in relations with representatives of contractors or public administration, including in relations among the companies of the ORLEN Capital Group.
- Gifts may be considered as income and therefore they are subject to income tax. In exceptional circumstances income obtained as a gift may be exempt from taxation.
- Without necessity to obtain additional consent, it is allowed to accept some gifts in connection with advertisement in a value not exceeding PLN 200 gross (polish zloty), it is carried out with the mentioned rules.
- Meals are acceptable in the company of the contractor's representatives only if their value is limited up to PLN 200 gross (polish zloty) per person, considering that:
 - 1) have an occasional nature and may be offered mutually;
 - 2) the person who is inviting and offering the meal, or it's representatives, participates in this meeting;
 - 3) no immediate family members, spouse, descendants, ascendants, relatives and family members in a direct line up to the second degree of kinship mentioned in point 1 did not participate in the meal.
- Invitations to entertainment events, understood as sporting events, theatre performances, concerts or other cultural events up to PLN 200 gross (polish zlotych) are allowed if:
 - 1) are of an occasional nature and may be offered on a basis of reciprocity;

- 2) the person offering the ticket also intends to participate in the event.
- The following are acceptable and are not treated as the gift: invitations to events, training courses or workshops conducted by the person handing the invitation as the host, as long as participation in the event is free of charge.
 - Advertising gifts such as pens, notebooks, calendars, other small items are acceptable, if possible with the contractor's logo in a value of not exceeding PLN 200 (polish zlotych) gross.
 - The following principles should be observed when deciding whether to accept the gift:
 - 1) The principle of honest intentions.
 - The circumstances of handling the gift and the gift itself are intended solely to build or strengthen business relations or courtesy.
 - The gift is not intended to have a negative impact on the recipient and his/her objectivity in taking business decisions.
 - The gift handling proposal does not come at a time when the recipient is involved in a decision making process, the beneficiary of which may be the person handling the gift or a person associated with it.
 - 2) The rule of lawfulness.
 - The type of gift and the circumstances in which it is given do not violate good customs as well as national, foreign and international legal regulations.
 - 3) Principle of proportionality.
 - The unit value of the gift is within the acceptable limit and in accordance with adopted standards in given case.
 - The gift is given occasionally and is associated with a specific occasion.
 - Handling the gift shall not impose any obligation on the recipient or create such appearance.
 - 4) The principle of transparency.
 - It is not permitted to accept gifts that in the mind of these receiving may be embarrassing because of their value or the feeling to return the gesture or the need to conceal the fact of receiving such gifts from the supervisor or co-workers.
 - Gifts are unacceptable if they meet at least one of the following conditions:

- 1) the gift is in the form of cash or a cash equivalent;
 - 2) the gift is inappropriate;
 - 3) acceptance of the gift is inconsistent with the anti-corruption policy in force in the ORLEN Capital Group companies or at the counterparty;
 - 4) the circumstances in which the gift is handled indicate that the handling party expects reciprocal of behaviour or the circumstances causes some commitments;
 - 5) a gift that may give rise to a conflict of interest;
 - 6) the acceptance of a gift is made conditional on the value or size of the benefits achieved in relation to the level of cooperation;
 - 7) A gift is given before establishing business relations, unless it is intended to present the core business of the site.
- For gifts received outside of Poland, the provisions of these rules regarding to tax matters apply only to the extent to which Polish tax law is applicable.
 - For tax purposes, the handler should give the recipient information about the value of the gift along with the gift.