

Excerpt from

INSTRUCTION

on individual traffic

in

ORLEN S.A.

DEFINITIONS:

Pass Office - separated organisational unit in the company: ORLEN Ochrona Sp. z o.o. dealing with e.g., issuing and accepting identification cards for Visitors/Service technicians entering the territory of a Protected structure of ORLEN S.A. located at entrance gates.

PTA Pass Office - separated organisational unit in the company: ORLEN Ochrona Sp. z o.o. dealing with e.g., **issuing** and accepting identification cards for Visitors/Service technicians, as well as with granting and withdrawing authorisations of access for a Visitor/Service Technician to the territory of PTA Plant in Włocławek.

CCGT Pass Office - separated organisational unit in the company: ORLEN Ochrona Sp. z o.o. dealing with e.g., **issuing** and accepting identification cards for Visitors/Service technicians, as well as with granting and withdrawing authorisations of access for a Visitor/Service Technician to the territory of CCGT Plant in Włocławek.

Visitor - person who does not possess an identification card or authorisations of access to a particular Protected structure not being a staff member of ORLEN S.A. or an ORLEN Group Company, and not performing any work in the protected territory.

Organisational unit manager - person who manages a team of staff members and is responsible for an operation area subordinate to him / her in ORLEN S.A. or the ORLEN Group Company holding a position of manager, director, or other depending on internal regulations. The organisational unit manager shall also mean a president of the management board, member of the management board, or authorised person of an External entity whose registered office or facility is located in the territory of a Protected structure of ORLEN S.A.

Administration Coordinator - separated unit in the company: ORLEN Administracja Sp. z o.o. dealing with management of area rented by ORLEN S.A. in the SENATOR building in Bielańska street in Warsaw.

Drug test - multi-parameter test for detection of drugs in saliva.

Protected structure - territory of the production plant in Płock, R&D Centre in Płock, Fuel Terminals, PTA Plant in Włocławek, and CCGT Włocławek Plant, internal area of storeys or buildings used by ORLEN S.A.

Carer of Visitor/Service Technician - person indicated by the Organisational unit manager introducing a Visitor/Service Technician, constantly accompanying him/ her during stay in the territory of a Protected structure of ORLEN S.A., ensuring safety & security instruction and personal protective equipment appropriate to requirements of the structure and situation. The carer shall be obliged to pick up a Visitor/Service Technician from the Reception Desk or Pass Office and to walk him / her to exit after the end of a visit. Carer of Service Technician who is indicated by a manager of the organisational unit in which service activities are carried out shall also be responsible for observance of OHS and Fire Protection provisions by the Service during performance of service activities.

External entity - external entity conducting activity in the territory of a Protected structure or providing services for ORLEN S.A., ORLEN Group Companies, or for External Entities carrying out activity in the territory of a Protected structure based on concluded contracts.

Staff Member of External entity - person employed in an External entity based on an employment contract, as well as a person providing services based on a civil-law contract, in particular, based on a mandate contract or a contract for a specific task.

Senator Reception Desk - separated organisational unit in the company: ORLEN Ochrona Sp. z o.o. dealing with e.g., issuing and accepting identification cards for Visitors/Service Technician, as well as with adding and withdrawing authorisations of access to the territory of a Protected structure of ORLEN S.A. in Warsaw, located in Bielańska street.

Service technician - a person engaged in the removal of all kinds of technical defects, as well as the ongoing monitoring of serviced equipment and devices.

Security Service - organisational units of the company: ORLEN Ochrona Sp. z o.o. performing tasks for ORLEN S.A. connected with protection of people, property, and operation of the Pass Offices based on concluded contracts.

ORLEN Group Companies - companies belonging to ORLEN Group, within the meaning of the Organisational Regulations of ORLEN S.A.

Security zone - separated area of a Protected structure the access to which is limited through application of access control system or area of a Protected structure specially marked for the purpose of limiting access for unauthorised persons.

Special supervision zone - separated area in the Security zone the access to which is limited to people working there or people who have obtained acceptance of a person managing the Special supervision zone. Authorisations of access to the Special supervision zone are granted by the Pass Office at gate no. 1 in Płock upon a written request of a person managing this zone (email, fax, letter). Authorisations of access to technical rooms managed by the area of the IT Executive Director (server rooms, nodes, etc.) are managed by the IT Executive Director or a person indicated by them through access to the access control system. The limitations in access to the Special supervision zones, excluding technical rooms of the area of the IT Executive Director, do not refer to Members of the Management Board and Members of the Supervisory Board of ORLEN S.A.

Security Chief - manager of the Security staff from the company: ORLEN Ochrona Sp. z o.o. supervising the Security Service.

I. GENERAL PROVISIONS

Each person entering the protected territory on foot or by vehicle must be trained in occupational health and safety in accordance with a separate internal organisational document on the principles, scope and implementation of training in occupational health and safety and other mandatory training in ORLEN S.A. and the manner of their documentation.

1. ORLEN S.A. is subject to special protection under the Act of August 22, 1997, on the protection of people and property (OJ of 2021, item 1995, as amended) and is:
 - a) a lower-tier establishment or an upper-tier establishment under the Act of April 27, 2001, Environmental Protection Law (OJ of 2022, item 2556, as amended),
 - b) an operator of critical infrastructure referred to in the Act of April 27, 2007, on crisis management (OJ of 2023, item 122, as amended),
 - c) an undertaking of a special significance for the economy and defence under the Homeland Defence Act of March 11, 2022 (Journal of Laws of 2022, item 655).
2. Due to specific character of Protected Structures, it is necessary to register people entering and staying in these structures. In case of a failure, it is necessary to know the number of people and place where they are.
3. In the territory of Protected Structures there is an absolute ban on carrying in weapons and ammunition as well as dangerous objects within the meaning of the Penal Code.

In particular, this includes:

- a) firearms, including combat weapon, hunting weapon, sports weapon, gas weapon, alarm and signal weapons;
 - b) pneumatic weapon;
 - c) incapacitating gas throwers;
 - d) tools and devices the use of which may endanger life or health, including, for example:
 - cold weapon in accordance with the currently binding Act on weapon and ammunition,
 - string weapon in the form of crossbows,
 - objects intended for paralysing people by means of electric energy;
 - e) explosives and pyrotechnic materials in accordance with the currently binding Act on explosives.
4. The ban on carrying in weapons referred to in section 3 does not concern facility weapons and direct coercion measures which staff members of the Security Service are equipped with.
 5. Infringement of the ban on carrying in weapons and ammunition shall result in the withdrawal of the authorisations to enter the premises of the Protected Structures for the person carrying in the weapon or ammunition referred to in section 3.

6. In the territory of Protected Structures there is a ban on taking photographs and filming. Conditions for obtaining the consent to the mentioned activities are **determined in Chapter IX of this Instruction.**
7. Entry of people into the territory of the Protected Structures with the electronic access control system, the list of which is available in the "Guidelines of the Executive Director for Control and Safety & Security to organisation of individual traffic in ORLEN S.A." hereinafter also referred to as: Guidelines, shall take place with the use of identification cards.
 - a. An identification card may also serve as a pass for entry into the territory of a Protected structure by motor vehicle. Detailed rules on entry into the territory of a Protected structure are included in Chapter IV of the Guidelines.
8. Entry into the territory of Protected structures included in the Guidelines, and not possessing the electronic access control system, shall take place on the basis of a one-off paper pass. A model of the pass is included in the Guidelines.
9. Upon expiry of an identification card, it needs to be immediately, within seven days, returned to the Reception Desk or to a relevant Pass Office. The return of the card is done by the employee or their immediate superior.
10. An identification card is owned by ORLEN S.A. People who possess identification cards shall be obliged to protect them against destruction, loss, or theft.
11. Making an identification card accessible to another person or using an identification card of another person shall be subject to the sanctions **determined in Chapter VIII of this Instruction.**
12. In case of **losing or stealing an identification card**, it is necessary to immediately inform the nearest Reception Desk or Pass Office at gate no. 1 in Płock about this fact by making a written statement. An identification card shall be blocked by a staff member of the Security Service. For a period of one week, the "Visitor" identification card shall be issued. If in this period the lost identification card is found, it shall be activated without taking any consequences. Return of the "Visitor" identification card possessed is the condition for activation of the found identification card.
13. In case of **destroying an identification card**, it is necessary to immediately inform the nearest Reception Desk or Pass Office about this fact by making a written statement.
14. A person who has lost an identification card or whose identification card has been destroyed or has been lost, shall be obliged to pay a fee in accordance with the price list of fees included in Chapter II of the Guidelines. This does not refer to identification cards lost or destroyed in circumstances through no fault of the person.
15. Issue of an identification card to the person referred to in section 14 shall take place after presenting by them proof of payment of the amount, arising from the price list for issuing the identification card, to the bank account indicated. Information on a valid account number and the fee amount is provided by the Pass Office at gate no. 1 in Płock. Transfer's title shall be determined as: fee for an identification card, first name and last name.

16. A person may possess only one identification card. It is not permitted to give an identification card to a person who has an identification card assigned in the system except the situation described in sections 12 and 17.
17. If a person possessing an identification card forgets it, it is permitted to issue the "Visitor" identification card; however, not more than 2 times within a month with the reservation that one period cannot last longer than 7 days. Each and every issue of the "Visitor" identification card is recorded in the access control system. Issue of the "Visitor" identification card is possible only if the identification card of a staff member is active. Issue of the "Visitor" identification card shall take place automatically and shall not require any confirmation from superiors. In case of exceeding the foregoing limit (2 times within a month), each and every issue of the "Visitor" identification card shall result in notifying a superior (this does not refer to Members of the Management Board and Members of the Supervisory Board).
18. For a person who has been withdrawn the right to enter the premises of the Protected Structures on the principles referred to in Chapter VIII (Penalties) of this Instruction, it is possible to issue an identification card for a single entry after obtaining the written consent of the Executive Director for Control and Safety & Security.
19. An identification card is a pre-numbered form and is subject to record in the access control system.
20. It is possible to replace an identification card due to a change of image or text of overprint on the obverse within binding models upon a request of a holder of the identification card or External entity after payment of a fee for the overprint.
21. **Amount of the fee for issuing an identification card, exploitation fee, fee for overprint, fee for holder, fee for lost, destroyed or not returned identification card** shall be determined by the Executive Director for Control and Safety & Security. Information on a current amount of the fee is put in a visible place in the Pass Offices. In addition, information on the fees mentioned in the previous sentence is included in the **Guidelines**.
22. **A photograph for an identification card** is taken in the Pass Office at gate no. 1 in Płock. It is acceptable to attach an up-to-date colour photograph (from an identity card or passport) in paper or electronic form (advisable resolution: 300x399 pixels and 300 dpi) to a request for issuing an identification card.
23. **Each and every identification card holder should carry it** in a visible place unless position-specific instructions provide for otherwise.

II. KINDS OF IDENTIFICATION CARDS

1. In PKN ORLEN S.A., the following kinds of identification cards are applied:
 - 1.1. grey - staff members of ORLEN S.A. and ORLEN Group Companies,
 - 1.2. yellow - staff members of External Entities,
 - 1.3. green - for Visitors and a replacement card for a staff member of ORLEN S.A., ORLEN Group Company, External entity,
 - 1.4. red - service technicians, failure

2. Models, rules on issuing, using and returning the identification cards referred to in section 1 are available in the **Guidelines**.

III. RULES ON ENTRY INTO THE TERRITORY OF A PROTECTED STRUCTURE

1. An identification card with granted entry authorisation entered into the database of the access control system is a document authorising to enter the territory of a Protected structure.
2. Detailed entries concerning rules on entry into the territory of a Protected structure are included in the **Guidelines**.
3. Traffic of vehicles of the State Fire Service in case of an emergency event shall take place under rules agreed between the Company Fire Service, Physical Safety Office and Security Service.

V. GRANTING AUTHORISATIONS OF ACCESS TO THE SPECIAL SUPERVISION ZONE

1. Staff members of ORLEN S.A., ORLEN Group Companies, and External Entities receive authorisations accordingly to a place where they perform work or provide services without access to other Special supervision zones.
2. Granting of permanent authorisations of access to the Special supervision zone (not being the place where work is performed, or services are provided) for people holding an identification card shall take place on the basis of a request the model of which is available in the Guidelines and on the Intranet in the following directory:
[Control and Safety Area Documents \(orlen.pl\)](http://orlen.pl).
3. Detailed rules on management of authorisations of access to the Special supervision zones are determined in the Guidelines (**this does not concern the “Visitor” and “Service technician” cards**).

VI. RULES ON INDIVIDUAL TRAFFIC IN PROTECTED STRUCTURES WITHOUT THE ELECTRONIC ACCESS CONTROL SYSTEM.

Detailed rules on individual traffic in Protected structures without the electronic access control system are determined in the **Guidelines**.

VII. RULES ON TESTING SOBRIETY AND CARRYING OUT DRUG TESTS.

In order to take up actions for sobriety and prevention of drug addiction, in the territory of Protected Structures the following provisions are applied:

- Act of 26 October 1982 on upbringing in sobriety and prevention of alcoholism (OJ 2023 item 165, as amended),

- Regulation of the Minister of Health of December 11, 2018, on tests of alcohol content in body (OJ of 2018, item 2472, as amended),
 - Regulation of the Minister of Health of 16 February 2023 on tests of alcohol content or substances having a similar effect to alcohol in the body of an employee (OJ 2023, item 317, as amended),
 - Regulation of the Minister of Health of July 16, 2014, on the list of working similarly to alcohol and on the conditions and method of conducting tests for their presence in the body (OJ of 2014, item 948, as amended),
 - Act of July 29, 2005, on prevention of drug addiction (OJ of 2023, item 172, as amended),
 - Act of 26 June 1974, – Labour Code (OJ of 2022, item 1510, as amended),
 - Disposition, currently binding in ORLEN S.A., on introduction of the Labour Regulations for staff members of ORLEN S.A.,
 - This Instruction.
1. In the territory of Protected structures of ORLEN S.A. there is a complete ban on staying for people with alcohol content in body over 0.2 ‰ or existence of alcohol in exhaled air is over 0.1 mg in 1 dm³, i.e. state after alcohol consumption (blood concentration from 0.2‰ to 0.5‰ or the presence in exhaled air of 0.1mg to 0.25mg of alcohol in 1dm³) and in the state of insobriety (blood concentration of more than 0.5‰ of alcohol or the presence in exhaled air of more than 0.25mg of alcohol in 1dm³), as well as under the influence of substances with effects similar to alcohol.
 2. In the territory of Protected structures of ORLEN S.A. there is a complete ban on carrying in, bringing in or drinking alcoholic beverages.
 3. In the territory of Protected structures of ORLEN S.A. there is a complete ban on carrying in, bringing in or using substances with effects similar to alcohol.
 4. Security staff members are authorised to take action under the law and internal regulations in a situation where the behaviour of a person entering or staying in the Protected structures may indicate a suspicion that he or she is under the influence of alcohol, intoxicated or under the influence of substances with effects similar to alcohol.

The scope and manner of sobriety checks and checks for the presence of substances with similar effects to alcohol are performed, in addition to the authorized body established to protect public order, Security staff members, in accordance with Polish legislation.

A detailed description of the steps covering the above-mentioned scope is included in the **Guidelines**.

5. On an ongoing basis, the Security staff members shall draw up notes concerning suspicion of committing offences by staff members of ORLEN S.A., ORLEN Group Companies, and External Entities within the scope of an infringement of provisions of this Instruction. Any information on offences and their perpetrators shall be sent to relevant Managers of organisational units of ORLEN S.A. and ORLEN Group Companies and External Entities having responsibility over these staff members.
6. In cases not included in this Chapter, decisions on sobriety and prevention of drug addiction shall be made by the Executive Director of the Control and Safety &

Security in consultation with the Personnel Executive Director and the Occupational Health and Safety Office Director.

VIII. PENALTIES

1. Hand-over of an identification card, admission of a person based on own identification card or use of another person's identification card:
 - 1.2. by a staff member of an External entity or ORLEN Group Company shall be treated as an **infringement of binding safety & security rules** resulting in the withdrawal of access rights to the territory of the Protected Structures.
 - 1.3. by a Visitor/Service technician shall be treated as an **infringement of binding safety & security rules** resulting in the withdrawal of access rights to the Protected Structures.
2. Seizure of ORLEN S.A.'s property:
 - 2.2. by a staff member of an External entity or ORLEN Group Company shall be treated as an **infringement of binding safety & security rules** resulting in the withdrawal of access rights to the territory of the Protected Structures and notifying the law enforcement bodies.
 - 2.3. by a Visitor/Service technician shall be treated as an **infringement of binding safety & security rules** resulting in the withdrawal of access rights to the protected Facilities and informing law enforcement bodies,
3. Seizure of property not belonging to ORLEN S.A.:
 - 3.2. by a staff member of an External entity or ORLEN Group Company shall be treated as an **infringement of binding safety rules**. The aggrieved person shall be obliged to inform law enforcement bodies and the Physical Safety Office of ORLEN S.A. The above results in withdrawing access rights to the territory of the Protected Structures.
 - 3.3. by a Visitor/Service technician shall be treated as an **infringement of binding safety rules** resulting in the withdrawal of access rights to the Protected Structures. An aggrieved person is obliged to inform law enforcement bodies and the Physical Safety Office of ORLEN S.A.
5. Staying in the territory of a Protected structure by a **staff member of an ORLEN Group Company or an External entity**:
 - 5.1 in the state after alcohol consumption - shall be treated as an **infringement of binding safety rules** resulting in the withdrawal of access rights to the Protected Structures.
 - 5.2 in the state on insobriety - shall be treated as an **infringement of binding safety rules** resulting in the withdrawal of access rights to the Protected Structures.
 - 5.3 under the influence of narcotic drugs, psychoactive and psychotropic substances - shall be treated as an **infringement of binding safety rules** resulting in the withdrawal of access rights to the Protected Structures.

PLEASE NOTE! Crossing of the line of the access control devices or fencing line is tantamount to staying in the territory of a Protected structure.

6. An infringement of safety rules:
 - 6.1. Smoking and using e-cigarettes in a forbidden place:
 - 6.1.2. by a staff member of an ORLEN Group Company or an External entity shall be treated as an **infringement of binding safety rules** resulting in the withdrawal of access rights to the territory of the Protected Structures,
 - 6.1.3. by a Visitor/Service technician shall be treated as an **infringement of binding safety rules** resulting in the withdrawal of access rights to the Protected Structures.
 - 6.2. Performance of particularly hazardous works without permit or in gross breach of the provisions and rules on occupational health and safety, fire protection and fire safety shall bring about immediate removal from the territory of a Protected structure, resulting in the withdrawal of access rights to the Protected Structures.
7. An infringement of Road Traffic provisions:
 - 7.1. speeding by 10km/h to 20km/h - withdrawal of entry authorisations of the culprit for a period of **1 week**,
 - 7.2. speeding by over 20km/h - withdrawal of entry authorisations of the culprit for a period of up to **1 month**,
 - 7.3. collision - withdrawal of entry authorisations of the culprit for a period of **at least 2 weeks**, except for a Visitor/Service technician where such event shall be treated as an **infringement of binding safety rules** resulting in the withdrawal of access rights to the Protected Structures,
 - 7.4. non-observance of other, not mentioned above, provisions on road traffic shall result in withdrawal of entry authorisations for a period of up to **2 weeks**.
9. A memorandum shall be drawn up from each event in the territory of a Protected structure by the Security Service, which shall be sent to the Physical Safety Office for information, and:
 - 9.2. in the case of staff members of ORLEN Group Companies and other External Entities, to the address of the registered office of the Company.
10. A person, whose access rights to the territory of the Protected Structures has been withdrawn, may submit a written request for the restoration of access rights to the Executive Director for Control and Safety & Security, together with the justification.
11. Only the person whose access rights to the territory of the Protected Structures has been withdrawn may be the requestor.
12. Once a year (or more in justified cases), the Executive Director for Control and Safety & Security shall convene a Team for an analysis of requests for the restoration of access rights to the territory of the Protected Structures. Composition of the Team: Director of the Occupational Health and Safety Office, Personnel Executive Director, Executive Director for Control and Safety & Security or persons authorised by them.
13. The Physical Safety Office keeps a record of received requests.
14. The Team's tasks include:

- 14.2. analysis and consideration of submitted applications for the restoration of access rights to the territory of the Protected Structures,
- 14.3. hand-over of decisions to:
 - 14.3.2. Requestors,
 - 14.3.3. Physical Safety Office - administrator of the "Accard" base,
 - 14.3.4. ORLEN Ochrona Sp. z o.o. - to carry out operations, consistent with an issued decision, aimed to restore access rights to the territory of the Protected Structures,
 - 14.3.5. Personnel Executive Director - to note down in stored personal documentation and use the decisions in any possible future personnel processes.
- 15. Ordinary cancelling of a penalty, resulting in the possibility of restoring access rights, shall take place after submitting a written request, however, not sooner than five years from date of imposing the penalty, excluding individual decisions of the Executive Director for Control and Safety & Security, made in agreement with the Personnel Executive Director and the Director of the Occupational Health and Safety Office.

IX. PHOTOGRAPHING AND FILMING

- 1. It is forbidden to photograph and film in the territory of Protected Structures without a consent, except for ORLEN S.A. employees whose duties performed as part of their work in a particular department require the use of Smart-Ex 02 company devices.
- 2. The consent to photograph and film in the territory of Protected Structures shall be given by the Executive Director for Control and Safety & Security. The consent to photograph and film is tantamount to a permit to carry in professional equipment i.e., camera/video camera necessary for performing this activity in the territory of a Protected structure. Subject to paragraph 4, photographing /filming with mobile phones/smartphones, etc. is prohibited.
- 3. The consent is given upon a request of a person managing an organisational unit responsible for functioning of a structure being the subject of photographing or filming. With regard to structures located in the territory of a Protected structure but forming a part of property of another enterprise, the request has to be approved by a person being a member of their management body or a person authorised by them.

X. FINAL PROVISIONS

- 1. Inspectors and state officers, during performance of control activities, may enter (on foot/by vehicle) the territory of a Protected structure under the rules stipulated in generally binding legal provisions.
- 3. In cases not included in this Instruction, the Security Chief, in consultation with the Physical Safety Office Director, on the ongoing basis shall settle problems connected with individual traffic.

5. In case of a contingency etc., all persons staying in the territory covered by the failure shall be subject to procedures included in a currently binding internal organisational act concerning the Comprehensive Chemical Rescue Plan and provisions of the “Instruction on proceeding in case of a contingency”.