

APPROVED BY
28 December 2021
Order No TV1(1.2-1)-*667* of
Public Company ORLEN Lietuva
General Director

Information Note No 3

[Attached when the other party to an agreement are such persons as advisers, accountants, auditors, consultants, rating agencies, translators, graphic designers, research companies and institutes, design companies and other persons specified in MAR Regulation as 'working for Public Company ORLEN Lietuva on the basis of other contract than the contract of employment'.]

INFORMATION NOTE REGARDING PUBLIC COMPANY ORLEN LIETUVA INFORMATION DISCLOSURE REQUIREMENTS

PKN ORLEN S.A., being a parent entity of Public Company ORLEN Lietuva (hereinafter, the Company), is subject to disclosure requirements towards capital market, regulated by the Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (market abuse regulation) and repealing Directive 2003/6/EC of the European Parliament and of the Council and Commission Directives 2003/124/EC, 2003/125/EC and 2004/72/EC with changes („MAR Regulation”).

Accordingly, in applying provisions of MAR Regulation, both Parties hereto agree as follows:

1. The Company informs the other party to the agreement that as a result of performing its obligations, it has an access to the inside information within the meaning of MAR Regulation, and PKN ORLEN S.A. is obliged to publish the information immediately or with delay.
2. An inside information within the meaning of MAR Regulation cannot be used or unlawfully disclosed by the other party to the agreement and persons working on its behalf. In case of use of inside information or its unlawful disclosure, the sanctions according to MAR Regulation apply.
3. If the circumstances mentioned in Item 1 arise, according to Art. 18 of MAR Regulation:
 - a) The other party to the agreement will be obliged to prepare a list of all persons having access to the inside information mentioned above. The other party shall include in the list its employees and persons working in its name or on its behalf.
 - b) The other party to the agreement shall take all reasonable steps to ensure that any person on the list of persons having access to inside information acknowledges in writing the legal and regulatory duties entailed and is aware of the sanctions applicable in case of use of inside information or its unlawful disclosure.
 - c) The other party to the agreement will be obliged to promptly update the list in strict compliance to Art. 18(4) of MAR Regulation.
 - d) The other party to the agreement will be obliged to retain its insider list for a period of at least five years after it is drawn up or updated.
 - e) The other party to the agreement shall provide the list of persons having access to inside information to the Polish Financial Authority upon its request.
4. Format of the list of persons who have access to inside information is determined by the Commission Implementing Regulation (EU) 2016/347 of 10 March 2016 laying down implementing technical standards with regard to the precise format of insider lists and for updating insider lists in accordance with Regulation (EU) No 596/2014 of the European Parliament and of the Council.