



**ORLEN**  
**UPSTREAM**  
NORWAY

## **The Norwegian Transparency Act Report**

Stavanger, 12 March 2026



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**JACEK DARIUSZ KRAWIEC**

Chairman of the Board



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**ALEKSANDRA DOBOSIEWICZ**

Member of the Board



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**MIROSLAW ANKIEWICZ**

Member of the Board



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**CYRYL FEDEROWICZ**

COO/CFO

## PURPOSE OF THE ACT

This Transparency Act Report for the year 2025 has been prepared in accordance with Section 5 of the Norwegian Transparency Act. The Act entered into force on 1 July 2022 and aims to:

- Promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and provision of services.
- Ensure public access to information regarding how enterprises address actual and potential adverse impacts on human rights and working conditions.

The report outlines the structure, policies, due diligence processes, findings and measures implemented by Orlen Upstream Norway AS (OUN) during the reporting year.

## ENTERPRISE'S STRUCTURE

ORLEN Upstream Norway AS (further referred to as: OUN/the Company) was established in May 2007, and its head office is in Stavanger/Norway, with a regional office in Tromsø. The objective of the Company is to explore, develop and produce hydrocarbons incl. crude oil, condensate and natural gas.

ORLEN S.A. (further referred to as: ORLEN) is the sole owner of OUN. The ORLEN Group is integrated, multi-utility company, that provides energy and fuel to over 100 million of Europeans, while its advanced products are marketed to over 100 countries across 6 continents. It ensures energy security for the region by supplying fuels, electricity and heat, while expanding its presence in international markets with a broad portfolio of energy and petrochemical products. ORLEN also carries its upstream activities in other countries than Norway: Poland, Canada, Pakistan, Egypt, Lithuania. The Group is implementing a longterm transformation aligned with its 2024–2030 Sustainable Development Strategy and 2025–2035 corporate strategy. ORLEN is gradually increasing the share of lowemission energy sources, investing in renewable power generation, energy storage, advanced biofuels, hydrogen technologies and carbon capture solutions. As part of its climate commitments, ORLEN aims to reduce emissions across refining, petrochemical and upstream operations and maintains its ambition to achieve net zero emissions by 2050. ORLEN is on the Warsaw Stock Exchange (WSE: PKN), listed since 1999.

## AREA OF OPERATIONS

OUN is one of the top ten gas producers on the Norwegian Continental Shelf ("NCS"). This strong position results from a long-term investment strategy and participation in the drilling of multiple exploration and production wells. These efforts have led to several significant discoveries, such as Omega Alpha in 2025, ranking among the largest discoveries on the NCS in many years. In addition, the Company has participated in 22 licensing rounds and been awarded 64 production licenses (out of which 11 as operator). OUN currently owns shares in twenty producing fields on the NCS (Skarv, Morvin, Vilje, Gina Krog, Ærfugl Nord, Skogul, Kvitebjørn, Valemon, Duva, Alve, Marulk, Ormen Lange, Tommeliten Alpha, Sleipner Vest, Sleipner Øst, Gungne, Utgard, Tambar Øst, Tyrving and Yme) and participates in development of nine other fields (Albuskjell, Vest Ekofisk, Tommeliten Gamma, Fenris, Alve Nord, Idun Nord, Yggdrasil, Eirin and Ørn).

## GUIDELINES AND PROCEDURES

The COO/CFO holds the overall responsibility for enterprise risk management in OUN, including any risks relating to human rights and decent working conditions however, the responsibility for the performance of various tasks is allocated to the relevant business units. Implemented Code of Ethics from 2024 sets out OUN's commitment to ethical business practices and social responsibility:

- OUN takes all possible measures to fully respect fundamental human rights and does not tolerate and prevent the dissemination of false or untrue information about the Companies and their employees,
- OUN eliminates all human rights violations and promotes the elimination of all forms of slavery and forced labour, and contributes to the effective abolition of child labour and prevents discrimination in employment,
- OUN ensures transparency of relations with customers and business partners by applying clear rules of cooperation.

In 2025 the Company introduced the Ethics Training Policy. This policy formalizes mandatory ethics training for all employees, with a strong focus on human rights, anti-discrimination, and compliance. It sets clear responsibilities, deadlines, and monitoring mechanisms to ensure a robust ethical culture within ORLEN Upstream Norway. In 2026 the Company will conduct mandatory online course in the field of ethical issues.

The Company has implemented several policies, including the Whistleblowing Policy, Procedure for addressing bullying and harassment in OUN, and a Policy for the Prevention of Corruption and Fraud within the ORLEN Group. Employees and contractors are encouraged to report any questionable conditions they encounter within the organization. In 2025, the Whistleblowing Policy was revised to improve the process for reporting potential malpractice or unlawful conduct. Any inquiries regarding obligations under the Transparency Act should be sent to [info@orlen.no](mailto:info@orlen.no) with the subject line: Transparency Act.

OUN established the Human Rights Protection Policy to define key principles for actions, responses, and regulations within the Group regarding human rights. The ORLEN Group follows internal policies, national laws, and international standards to ensure respect for human rights in its operations and external relations—see *Human Rights Protection Policy in the ORLEN Capital Group* on ORLEN S.A. website.

The Company is committed to proactively mitigating any adverse effects on human rights associated with its operations, both directly and indirectly. The updated Terms and Conditions (TC) now address key elements of Human Rights, reflecting guidance developed by Offshore Norge. Additionally, the Terms and Conditions incorporate explicit clauses concerning human rights, and measures to prevent child labour and forced labour.

OUN follows key principles:

- Risk assessment: OUN conducts regular risk assessments of its operations,
- Training and awareness: OUN raises awareness in this area internally.
- Reporting and investigation: OUN have established reporting mechanisms to report any concerns (e.g. through Whistleblowing Policy).

Overall, OUN has a strong commitment to ethical business practices and social responsibility and takes measures to prevent modern slavery and human trafficking in its operations and supply chain. In 2025, OUN executed regular due diligence activities that included thorough risk identification procedures:

- Mapping new suppliers against country- and sector-specific human rights risks.
- Screening new suppliers for potential issues such as forced labour, child labour, discrimination, limitations on freedom of association, and occupational health and safety concerns.

In addition to the procedure and mentioned policies and TCs, OUN utilizes an industry wide used tool Magnet JQS for supplier assessment. Magnet JQS has implemented a Human Rights Self-Assessment (HRSA) process. The HRSA is a tool that helps the company identify and manage potential human rights risks and impacts associated with its operations and supply chain. The HRSA process involves several steps, including:

- identifying potential human rights risks and impacts: Magnet JQS conducts a thorough review of its operations and supply chain to identify potential human rights risks and impacts, using various sources of information, including stakeholder feedback, media reports, and risk assessments.
- assessing the severity of risks and impacts: Once potential risks and impacts have been identified, Magnet JQS assesses their severity, based on factors such as the likelihood and potential consequences of the risk or impact,
- developing a management plan: For risks and impacts that are identified as high priority, Magnet JQS develops a management plan, which outlines the steps that the company will take to address the risk or impact. This may involve engaging with stakeholders, implementing new policies or procedures, or working with suppliers to improve their human rights performance,
- monitoring and reporting: Magnet JQS monitors the effectiveness of its management plan and reports on its progress and performance, both internally and externally.

Overall, the HRSA process is an important tool for Magnet JQS to identify and manage potential human rights risks and impacts associated with its operations and supply chain, and to ensure that the company is upholding its commitment to responsible business practices.

In addition to HRSA, Magnet JQS offers a service to audit specific suppliers within depth review of procedures, practices and on-site visits. The tool provides access to historical HR audits performed and allows to nominate specific vendors for joint audit program.

During 2025, OUN actively engaged in Magnet JQS activities by participating in both the Magnet JQS Qualification and Audit Network Meeting, and the Audit Program Nomination Meeting. In 2025, 286 companies—predominantly within Scandinavia but also across Europe, Asia, and America—had their Management System audited. Furthermore, four companies were nominated to carry out Human Rights audits during the same year. In addition, OUN employees from Procurement Unit completed two web-based training sessions to further strengthen its knowledge and competencies within the Magnet JQS system.

In accordance with OUN's established practices, the organisation undertakes ongoing verification and continuous improvement to implement increasingly rigorous internal and external standards. There is a particular emphasis on enhancing the quality of suppliers, especially with regard to

human rights and decent working conditions. This approach forms an integral part of OUN's commitment to meeting higher expectations in both regulatory compliance and ethical business conduct.

This continuous improvement process is fully aligned with the ORLEN Group Sustainability Strategy 2024–2030, which prioritises the upholding of human rights across the Group's value chain. The strategy outlines clear objectives such as promoting employee awareness of human rights protection and maintaining active collaboration with partners to mitigate negative impacts associated with potential human rights violations. Through these measures, OUN reinforces its ongoing commitment to responsible and sustainable business practices as part of the wider Group objectives.

## ADVERSE IMPACTS AND SIGNIFICANT RISKS

In accordance with best practices and regulatory requirements, OUN has conducted a management risk assessment to identify and evaluate potential risks associated with our operations. No significant risks were identified that could pose a substantial threat to our business or stakeholders. This assessment reaffirms OUN's commitment to maintaining a robust risk management framework and ensuring the stability and resilience of our operations.

The risk assessment process employed by OUN involved a systematic and multidisciplinary approach. It incorporated input from various departments, subject matter experts, and key stakeholders across the organization. The assessment followed recognized risk management methodologies, combining both qualitative and quantitative analysis to ensure a comprehensive evaluation.

Throughout the assessment, potential risks were identified, evaluated, and ranked based on their likelihood of occurrence and potential impact. These risks encompassed various aspects of our operations, including financial, legal, operational, regulatory, environmental, and reputational factors.

While the management risk assessment yielded positive results, we recognize the need for ongoing vigilance and continuous improvement. OUN remains committed to regular risk assessments, reviewing its risk management practices, and adapting them to changing circumstances and emerging risks. We understand the importance of maintaining a dynamic approach to risk management to anticipate and address potential challenges effectively.

OUN's activity is based geographically in a low-risk environment regarding human rights and working conditions. Therefore, the employment legal framework, guidelines from Norwegian Authorities and industry specific regulations are implemented in daily activities and are verified on regular basis (e.g. through Havtil audits).

Following the 2024 workshop on human rights due diligence and associated risks for key personnel—including the management team, Legal, HSEQ, and Procurement—the human rights due diligence process has been integrated into departmental procedures. Departments responsible for areas related to human rights and decent working conditions now incorporate these practices into their established risk management processes.

## INFORMATION REGARDING MEASURES

In recent years, there has been increasing awareness and emphasis on corporate social responsibility and sustainability within the oil and gas industry. OUN have conducted due diligence to identify and address any potential human rights risks associated with their operations. This includes implementing measures to prevent and mitigate adverse human rights impacts, conducting impact assessments, and engaging with stakeholders to address concerns.

Key measures implemented during 2025 comprised:

- Incorporation of contract clauses addressing ethical conduct and labour rights.
- Providing update for employees and contractors regarding the Code of Conduct.

Performance tracking takes place through corporate reporting on ESG as a result of the EU Corporate Sustainability Reporting Directive (CSRD) including aspects of human rights.

Looking ahead to 2026, OUN will focus on strengthening the Supplier Management process by introducing a comprehensive supplier onboarding model, formalizing supplier lifecycle management, and enhancing due diligence activities through the implementation of a specialized software platform.

OUN, as a production license operator, must comply with health, safety, and environmental regulations, including the Transparency Act. Its direct supply chain mainly includes Norwegian and European providers for drilling, subsea operations, engineering, logistics, HSE, and support services, all meeting strict regulatory standards.

Human rights risks in non-operated assets are followed up similarly as other risks in the licenses. OUN monitors and follows-up operators in non-operating licenses as part of the see-to-duty. This accounts for both the activities offshore, but also for direct and indirect procurement and supply chain activities of the operator. Its indirect supply chain through license operators in offshore operations and onshore fabrications was delivered by suppliers from different continents and the company was running its overview during regular site visits. OUN employees attended a sequence of site visits over its supply chain in developments projects worldwide to properly verify and recommend where needed certain activities throughout its operators.

It is important to note that the offshore industry's engagement with the human rights sector is a complex and ongoing process. While there are regulations and initiatives in place to promote responsible practices, challenges may still arise, and continuous improvement is necessary.