

Public Information Summary

Host Country	Poland
Name of Guaranteed Party	DFC will provide a guaranty to Goldman Sachs Bank Europe SE (“Goldman Sachs”) for payment obligations of ORLEN with respect to derivatives executed between ORLEN and Goldman Sachs.
Project Description	DFC guaranty covering potential derivative obligations owed by ORLEN to Goldman Sachs in the context of ORLEN's hedging activity in relation with its US-EU LNG exposure.
Proposed DFC Loan/Guaranty	\$500,000,000; up to 7-year tenor
All-Source Funding Total	\$526,315,789.48
Policy Review	
Developmental Objectives	<p>The Project is expected to have a positive but limited development impact in Poland by helping to address the country’s growing demand for natural gas after Russia halted gas exports to the country, which accounted for approximately 55% of the Poland’s gas imports and 42% of total gas supply.</p> <p>Specifically, the Project will enable ORLEN to limit its commodity price risk exposure and reduce its liquidity constraints in a highly volatile gas market, by increasing the amount of LNG related hedges available to ORLEN through Goldman Sachs.</p> <p>Furthermore, the Project will facilitate the continued supply of gas to Poland, which is an important component to the country’s energy policy of reducing the carbon intensity of its energy supply through, in part, moving away from coal-fired power towards the increased use of natural gas and renewables.</p>
Environment and Social Assessment	<p>DFC has reviewed the Project against its categorical prohibitions and has determined it to be categorically eligible. Guaranties to support hedges are screened as Category C projects under DFC’s environmental and social guidelines and DFC considers the Project’s environmental and impact concerns to be minimal. Because the Project involves providing a financial service, DFC assessed that the Project’s activities are not expected to be vulnerable to physical climate change and therefore a climate change resilience assessment is not needed.</p> <p>The Project is subject to DFC’s Environmental and Social Policy and Procedures (January 2020). DFC’s environmental and social due</p>

diligence indicates that the Project will have impacts which must be managed in a manner consistent with the following of the International Finance Corporation's ("IFC") 2012 Performance Standards ("PS"):

- PS 1: Assessment and Management of Environmental and Social Risks and Impacts; and
- PS 2: Labor and Working Conditions

DFC's desk-review due diligence assessment indicates that the Project involves providing a guaranty that supports increased hedging activity. Therefore, the Project is not anticipated to involve adverse impacts with respect to pollution, community health and safety, land acquisition, biodiversity, Indigenous Peoples, or cultural heritage, and PS's 3 through 8 are not triggered by the Project at this time.

ORLEN has an Integrate Management System ("IMS") in place which includes the following components: Quality Management System based on ISO 9001 and AQAP 2110; Environmental Management System based on ISO 14001; Occupational Health and Safety Management System based on ISO 45001; Energy Management System based on the ISO 50001; Information Security Management System based on ISO/IEC 27001; International Sustainability & Carbon Certification System (ISCC EU); Sustainability Certification System for Biomass and biofuels (KZR INiG); Factory Production Control System (ZKP); HACCP Food Safety Management system compliant with Codex Alimentarius standard; Quality Management System based on ISO/IEC 17025 standard; and Risk Based Inspection Management System (RBI).

ORLEN states that collective bargaining agreements regulate the employer-employee relationship, with a focus on hiring, promotion, and remuneration systems (including pay scale, base pay, and bonus system). Additionally, ORLEN asserts that its Human Resources Management Policy addresses corporate culture, segment-based management, employee development, employee benefits, and performance management. Finally, the ORLEN Supplier Code of Conduct encourages suppliers to develop and perfect responsible business practices.