UK Tax Strategy for

Orlen LNG Trading Limited & Orlen LNG Shipping Limited

Financial Year Ended 31 December 2026

This document sets out the UK Tax Strategy for Orlen LNG Trading Limited, Orlen LNG Shipping Limited and ORLEN Energy Trading (UK Branch) ("Orlen LNG" or "the Group"). Orlen S.A. is the ultimate parent of Orlen LNG Trading Limited and Orlen LNG Shipping Limited.

This strategy applies to all UK taxes including Corporation Tax, PAYE, National Insurance Contributions, VAT, Stamp Duty, and any other taxes administered by HM Revenue & Customs ("HMRC").

The Group regards publication of this Tax Strategy as complying with the duty under paragraph 16(1) of Schedule 19 to the Finance Act 2016 to publish a Tax Strategy for the financial year ended 31 December 2026 (“FY26”) and has been approved for publication by the Board of Directors.

This strategy will be reviewed annually and updated as necessary to reflect changes in the Group's business and approach to taxation.

Company Profile

Orlen LNG was established in 2017, in London, United Kingdom, in order to provide tailored LNG trading and shipping solutions to the global market.

Orlen LNG Trading Limited and Orlen LNG Shipping Limited are UK tax resident companies and direct wholly-owned subsidiaries of Orlen Energy Trading GmbH, which in turn is a subsidiary of Orlen S.A. ORLEN Energy Trading GmbH is a UK branch of the German tax resident company.

Orlen S.A. is headquartered and tax resident in Poland, it is an integrated multi-utility group with operations in Central Europe, Canada and other parts of the world, providing energy and fuels to more than 100 million Europeans, with advanced products available in nearly 100 countries across six continents.

Orlen LNG Trading Limited operates within the global Liquefied Natural Gas ("LNG") market, involved in the acquisition, transportation, and sale of LNG cargoes worldwide. The Company's strategic focus is catered to meeting the LNG demands of its parent company, Orlen S.A., whilst ensuring cost-effectiveness.

We are guided by core values that define who we are and how we operate: transparency, clarity, creativity, integrity and an unwavering commitment to putting our clients’ needs first. Our goal is to consistently deliver best-in-class service, ensuring that our clients receive exceptional support and value at every stage.

Approach to Risk Management and Governance Arrangements

The Head of Finance is ultimately responsible for the Group’s UK tax affairs and oversees the day to day running of tax matters and compliance, supported by the Finance department, and overseen by the Executive Directors. Significant commercial considerations are reviewed and discussed internally within the organisation, with independent professional advice obtained where matters of particular complexity arise. All such advice is subject to review by the Head of Finance, who ensures that any proposed course of action is in keeping with the Group's values, and the prevailing legal requirements. Employees responsible for tax matters receive appropriate training to ensure the effective management of the Group's tax affairs, supplemented by external advisers where required.

The Directors provides oversight of the Group's risk management and compliance with legal and regulatory requirements, including the Group's tax strategy. Tax risks are documented and reviewed as part of the annual Senior Accounting Officer ("SAO") process, with oversight from the SAO of the UK Group.

The Head of Finance meets with the Directors regularly to discuss tax matters relevant to the Group, including the escalation of any applicable tax risks.

Reliance is placed upon external tax advisers where there is a need for specialist guidance and support, for example in new areas of the law. However, responsibility for tax and decisions around tax remain with the Finance function and Directors.

Attitude Towards Tax Planning

The Group is committed to conducting its business and tax affairs with honesty and integrity. The Group intends to ensure correct and timely fulfilment of all their obligations under tax laws, recognising their role in contributing to public funds that are used to support vital social initiatives. The Group prioritise transparency in tax reporting and in contacts with public and local authorities, including tax authorities.

The highest standards of due diligence and tax reporting enhance Orlen's tax transparency, strengthen its credibility in the market, and build trust with external customers. The Group does not engage in any activities aimed at tax optimisation or tax evasion, nor does it take any actions which may increase tax risk. The Group will only carry out responsible tax planning that is aligned to commercial goals and genuine economic activities.

The Group considers the tax incentives and reliefs available in the jurisdictions in which we operate, for example in relation to capital allowances in the UK, and applies these in accordance with the appropriate tax legislation.

Acceptable Level of Tax Risk

The Orlen Group has implemented an Organisational Standard on Reporting of Tax Risks and Information, which requires the Group companies to promptly escalate any identified tax risks and initiated tax inspections or procedures. Moreover, the wider Orlen Group has developed a tax risk management strategy/policy that outlines a tax vision and shared values within the context of the tax policy. This tax strategy is further elaborated in various procedures, internal orders, and instructions, which form a framework ensuring proper fulfilment of tax liabilities.

Our appetite for tax risk is considered to be low, consistent with the Orlen Group's risk-adverse approach to taxation. We do not engage in any activities aimed at tax evasion and instead we seek to manage tax risks to ensure we pay the correct amount of tax.

Approach Towards Dealings with HMRC

Where areas of tax law are particularly complex, or where there are differing rulings of courts or other competent authorities, we engage expert opinions from independent advisers and seek to resolve any areas of uncertainty through open and transparent dialogue with the relevant tax authorities.

In this regard, the Group aims to keep its relationship with HMRC and other tax authorities both open and productive. This is achieved by maintaining open channels of communication and responding in a timely manner.

The Group is committed to:

- Making accurate, timely disclosures in compliance with all relevant statutory obligations;
- Responding promptly and professionally to all HMRC and other tax authority enquiries and information requests; and
- Maintaining accurate records and documentation to support all tax filings and positions.

Approved on June 1, 2026