

2022 Transparency Act Report

This report has been prepared in accordance with the Norwegian Transparency Act (the “Transparency Act”) section 5 and provides information on the implementation and results of due diligence.

The Norwegian Transparency Act shall promote enterprises’ respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure the general public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions.

This is the first year the Company is performing mentioned due diligence according to Norwegian Transparency Act.

ABOUT LOTOS EXPLORATION AND PRODUCTION NORGE AS

LOTOS Exploration and Production Norge AS (further: LEPN/the Company) is an upstream oil and gas Company established in Norway/Stavanger in 2007. LEPN is a licensee on the Norwegian Continental Shelf; partner in the production of hydrocarbons from the following fields: Sleipner, Heimdal and Yme. The Company is also an active licensee in the Yggdrasil and Tryving developments.

As of 31 December 2022, Company had 34 permanent employees.

GOVERNANCE OF HUMAN RIGHTS AND DECENT WORKING CONDITIONS

Human rights and working conditions are imbedded in the Company’s Management System, including a Human Rights Policy, Ethical Policy and Whistleblowing Policy. Guided by these policies, processes for risk assessment and audits can identify and mitigate the potential for adverse impacts on the human rights of people involved in the Company’s business. LEPN works towards ensuring that its business operations do not cause or contribute to actual or potential adverse impacts on human rights and decent working conditions Furthermore, the Company is a member of the Confederation of Norwegian Enterprise (NHO) and Offshore Norge and as such performs due diligence assessment and other activities towards the operators, their contractors and alliance partners in accordance with Offshore Norge guidelines. Human Rights matters are included and discussed in quarterly license meetings, as well as during Audits, verifications and site visits. Moreover, LEPN has mechanisms in place to report situations that violate laws; employees are encouraged to raise concerns and report violations of applicable laws and internal regulations.

During 2022 LEPN strengthened its approach to human rights and decent working conditions by reviewing and updating LEPN internal policies covering Human Rights, Discrimination and Whistleblowing.

DUE DILIGENCE WITH RESPECT TO HUMAN RIGHTS AND DECENT WORKING CONDITIONS

LEPN performs due diligence reviews in accordance with the respective Offshore Norge guidelines. Human rights are monitored in quarterly license meetings, as well as during Audits, verifications and site visits.

RISK ANALYSIS

LEPN's activity is located in Norway which is considered to be a low-risk environment with regard to human rights and working conditions. There is a strong legal framework governing employment, guidelines from Norwegian Authorities, and industry specific regulations. These are complied with and are verified (f.e. through Petroleum Safety Authority and internal audits).

LEPN does not operate any assets on the Norwegian Continental Shelf, therefore the company does not procure directly from global suppliers. With regards to office activities, LEPN cooperates with reputable local vendors on a small scale.

IDENTIFICATION AND MITIGATION OF RISK

Based on LEPN's risk analysis, no impacts on fundamental human rights and decent working conditions linked to Company's own operations were identified.

FOCUS IN 2022 AND PLANS FOR 2023

LEPN's efforts with respect to human rights and decent working conditions, were based on risk and focused mainly on reviewing and updating policies related to human rights management, anchoring roles and responsibilities for human rights management, carrying out risk assessments, and participating in industry Human Rights initiatives.

PGNiG Upstream Norway AS acquired all assets from LEPN on 2nd May 2023. The Company's activity is limited at the moment and is focused on adjusting its activity profile. The policies will reflect that. Going forward, LEPN's intention is to monitor and update, if needed, the procedures and processes related to safeguarding human rights and decent working conditions. The Company will promote all activities related to respect for fundamental human rights and decent working conditions by close cooperation with its partners.

*The Board of Directors of LOTOS EXPLORATION AND PRODUCTION NORGE AS
Stavanger 15.06.2023*



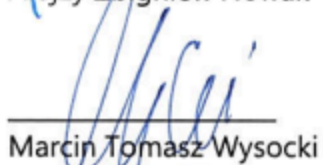
Chairman
Piotr Długosz



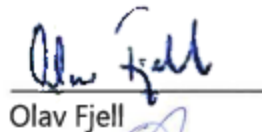
Bernard Cichocki


Wojciech Fedko

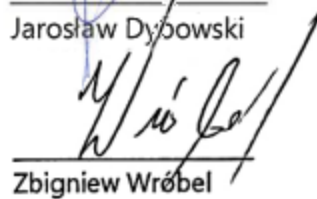

Alojzy Zbigniew Nowak


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