

Polski Koncern Naftowy ORLEN S.A. ("PKN ORLEN") discloses the list of shareholders who had a right to exercise at least 5% of votes at the Ordinary General Meeting of Shareholders of PKN ORLEN which was originally convened for 30 June 2009 and which was continued on 15 July 2009 ("OGM") together with the number of votes held by each shareholder and percentage share in the votes represented at the OGM and in the total number of votes.

| No | Shareholder | Number of shares registered at OGM | Number of votes | Shareholder votes at OGM (%) | | Shareholder votes in total number of votes (%) |
|----|--|------------------------------------|-----------------|------------------------------|------------------|--|
| | | | | dated 30.06.2009 | dated 15.07.2009 | |
| 1. | AVIVA OTWARTY FUNDUSZ EMERYTALNY AVIVA BZ WBK ul. Prosta 70 00-838 Warszawa | 12 000 000 | 12 000 000 | 5,91% | 5,96% | 2,81% |
| 2. | ING OTWARTY FUNDUSZ EMERYTALNY ul. Ludna 2 00-406 Warszawa | 22 118 813 | 22 118 813 | 10,90% | 10,99% | 5,17% |
| 3. | NAFTA POLSKA S.A. ul. Jasna 15 00 - 003 Warszawa | 74 076 299 | 74 076 299 | 36,49% | 36,80% | 17,32% |
| 4. | OTWARTY FUNDUSZ EMERYTALNY PZU "ZŁOTA JESIEN" ul. Jana Pawła II 24 00-133 Warszawa | 13 000 000 | 13 000 000 | 6,40% | 6,46% | 3,04% |
| 5. | STATE TREASURY REPRESENTED BY THE MINISTER OF THE STATE TREASURY ul. Krucza 36/Wspolna 6 00 - 522 Warszawa | 43 633 897 | 43 633 897 | 21,49% | 21,68% | 10,20% |