

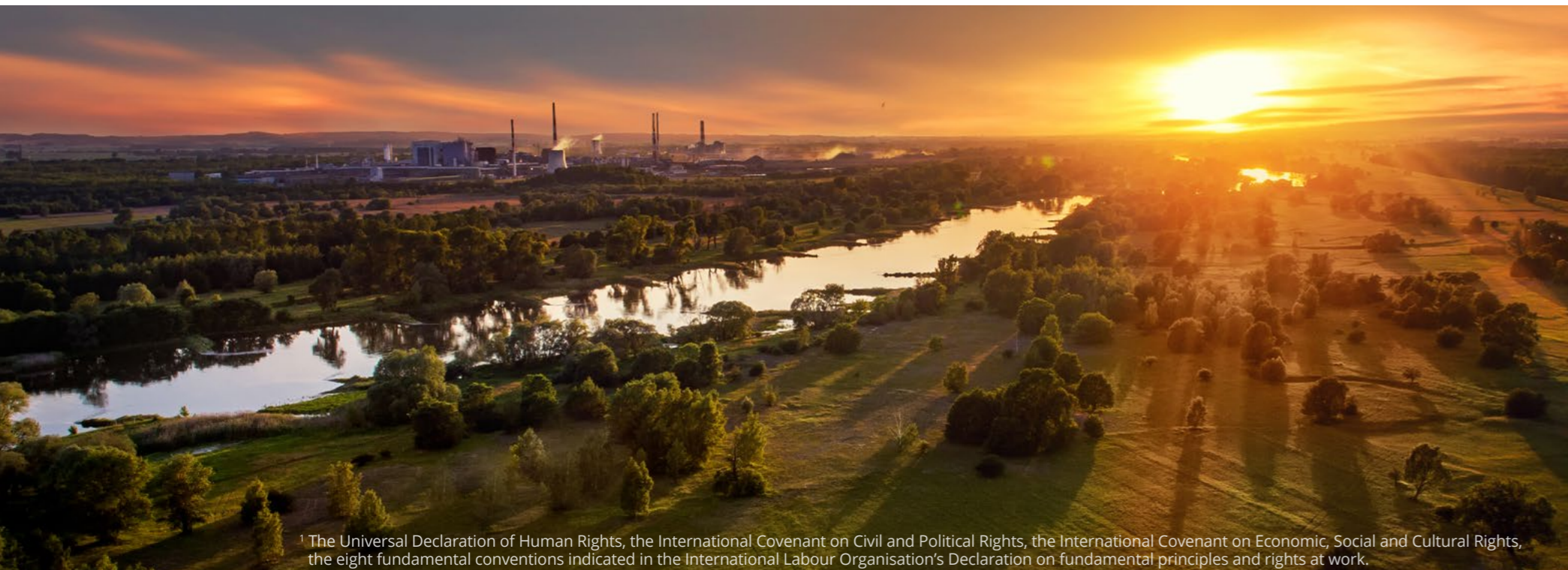


HUMAN RIGHTS POLICY

IN THE KGHM POLSKA MIEDŹ S.A.

KGHM Polska Miedź S.A. is a global organisation, aware of the role played by human rights in the contemporary world. As a company that plays a crucial role in the Polish economy, we accept the responsibility to protect and respect all internationally recognised human rights.

In KGHM Polska Miedź S.A. we pledge to protect, promote and implement human rights wherever we carry out our activities and towards all entities on which we have a direct or indirect impact. KGHM Polska Miedź S.A. does much more to protect human rights than is required by domestic law. We pledge to conduct our business in a manner consistent with the International Charter of Human Rights¹, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the UN Declaration on the Rights of Indigenous Peoples and the OECD Due Diligence Guidance on Conflict-Affected and High-Risk Areas. We declare that respect for human rights by other entities with which we cooperate is an important factor to be taken into account when establishing mutual business relations.



¹ The Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, the eight fundamental conventions indicated in the International Labour Organisation's Declaration on fundamental principles and rights at work.

In KGHM Polska Miedź S.A. we stand up against all unethical actions towards people providing work, both within the Company and throughout the whole value chain. We are guided by the principle of protecting the dignity of work, including in matters relating to fair pay, the right to rest and equal access to training. We do not accept any form of violation of personal dignity and gender equality, including: discrimination, harassment, abuse and other actions that violate the rules of social coexistence.



We are combating all forms of modern slavery, forced labour and torture. The company rigorously respects the prohibition on the employment of minors. Whilst protecting all rights relating to personal dignity, we also respect, protect and promote family and parental values (the right to live with family).

We recognise that the protection of human rights is strategically important. In order to ensure that all human rights are fully protected and that this Policy is up-to-date, continuous monitoring and analysis of the value chain is conducted. This Human Rights Policy is compliant with the implemented Corporate Risk Management Policy and Procedure and contains the identified risks regarding potential human rights violations in the Company's operations along with their mitigation. Despite the limitations specific for the mining, steel and metal refining industries, we strive for continuous improvement of attitudes. This Policy is supported by the Company's existing regulations and procedures which form part of this document.

As a result of the value chain analysis carried out, the most important human rights in the Company's operations include:

1 The right to benefit from just and favourable working conditions

2 The right to privacy

3 The right to working conditions that meet health and safety requirements.



EMPLOYEES' RIGHTS

The Company's Management Board accepts ongoing dialogue with employees as an obligatory norm, including in terms of the implementation of human rights protection, fully respecting activities protecting the rights of persons performing work, in particular such activities as: organising speeches, associations, or the possibility to form and join trade unions in the Company. The employees of KGHM Polska Miedź S.A. are associated in several dozen trade unions. Trade unions, while fulfilling their tasks, also have the right to report and investigate violations in the area of human rights protection with the Company's management. At the same time, the commitment of the Company's Management expressed in this Policy is fully realised by promoting the same attitude among the Company's employees.

THE RIGHT TO WORKING CONDITIONS THAT MEET HEALTH AND SAFETY REQUIREMENTS

Occupational health and safety, due to the nature of the Company's activities, constitutes a priority of the adopted Human Rights Policy. The protection of the right to decent working conditions that comply with health and safety requirements (Occupational Health and Safety Policy) is a specific action and a manifestation of concern for the health of all who are on the Company's premises.

In every Division of the Company there is a Social Labour Inspector who has the right to intervene in the event of risks or violations. There are also departmental Labour Inspectors in the divisions with an extensive organisational structure. Reported issues in the area of occupational health and safety are also resolved by the Occupational Health and Safety Committee, which consists of representatives of the employer, the Social Labour Inspector of the company, the occupational physician and trade union representatives.

HUMAN RIGHTS AND THE VALUE CHAIN

In KGHM Polska Miedź S.A. we do not undertake actions leading to obtaining business benefits while disregarding human rights. We avoid working with companies that practice forced labour, slave labour, child labour, companies that fail to ensure safety conditions in the workplace and companies that fail to respond to other unethical activities.

In KGHM Polska Miedź S.A., through the implementation of relevant documents (Procurement Policy, Contracting Policy, Responsible Supply Chain Policy, Anti-Corruption Policy), we verify entities with which we cooperate from the perspective of human rights protection. Including the use of special clauses in contracts or the so-called Contractor's Charter, in which the contractor declares to respect human rights, in accordance with the standards adopted in this Policy. In the event of violations of these rights, the Company maintains a consistent dialogue in accordance with its Human Rights Policy in order to mitigate and prevent future violations.

SOCIAL DIALOGUE AND HUMAN RIGHTS

We are in constant dialogue with local governments and communities located in areas where KGHM's activities may have an impact. This dialogue also concerns the protection of human rights. We prioritize the reduction of all risks to the community resulting from the Company's activities (including the reduction of the risk of compromising the right to health through consistent implementation of the Climate Policy and the Environmental Policy). We actively support the development of local communities and respect their culture by respecting the rights of indigenous peoples (which is of great importance in the case of the international companies of the Group over which KGHM Polska Miedź S.A. exercises ownership supervision).

TOOLS FOR IMPLEMENTATION

KGHM Polska Miedź S.A., expressing its highest concern for the protection of human rights within its organisation and towards all stakeholders on which it has a direct or indirect impact (local communities, contractors, clients, shareholders), enables the identification of irregularities in order to prevent violations, including the reporting of human rights violations, through a Whistleblower Platform which is accessible to all. KGHM Polska Miedź S.A. provides protection for whistleblowers. The protection of human rights is also implemented through the verification of individual reports by the HR Department units. The continuous dialogue with trade unions takes into account the possibility of working out joint solutions to identified risks and possible violations arising in the area of human rights protection.

In KGHM Polska Miedź S.A. we exercise due diligence in reporting on our activities, including non-financial activities. The status of implementation of this policy shall be reported on an annual basis. All employees of the Company are obliged to respect human rights. The Company also provides training concerning the protection of human rights to its employees.

This Human Rights Policy, adopted by the Management Board of KGHM Polska Miedź S.A., applies at the Head Office and all Divisions of the Company, and is generally available and known to employees as well as other people working for the Company.

Together with the Management Board of KGHM Polska Miedź S.A., I pledge to support the actions resulting from this Policy and to ensure that adequate resources and means are provided to implement and maintain the actions set out in it.

First Edition

Lubin, 17 April 2022

President of the Management Board



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