

# ESG



## SUSTAINABLE DEVELOPMENT POLICY OF THE KGHM POLSKA MIEDŹ S.A. GROUP

The KGHM Polska Miedź S.A. Group (hereinafter referred to as the "KGHM Group"), as a global entity in the non-ferrous metals mining and processing industry, specializing in the production of copper and silver, conducts its business based on the principles of sustainable development. The KGHM Group strives to create sustainable value for its stakeholders, while respecting the natural environment, social issues and the principles of transparency, responsibility and ethical conduct throughout the company. This Sustainable Development Policy of the KGHM Group (hereinafter referred to as the "Policy") is in line with the strategic directions of the KGHM Group and supports their implementation in the long term.

The Policy applies to all entities of the KGHM Group and is applicable throughout the entire value chain, including external business partners. Responsibility for the implementation and supervision of the implementation of the Policy lies with the Management Board of KGHM Polska Miedź S.A., supported by the ESG Department and the relevant organizational units responsible for individual areas of activity. The Policy is an integral element of the KGHM Group's management system, influencing decision-making processes, operational planning and reporting activities.

### Our commitments

The sustainable development goals pursued by the KGHM Group are an integral part of the management model. In particular, we undertake to:

- Conduct business based on the highest standards, in accordance with the adopted values: zero-harm, teamwork, results-driven, accountability and courage.
- Develop in a sustainable manner, with respect for ethical principles and transparency, while taking into account best industry practices in the field of social and environmental responsibility.
- Strive to achieve climate neutrality by 2050 in terms of greenhouse gas emissions.
- Develop and implement innovative technologies, including renewable energy sources, to increase energy efficiency and reduce emissions.
- Optimize production processes in accordance with the principles of the circular economy (CE), by minimizing the consumption of resources and improving copper recycling processes.
- Ensure safe and decent working conditions, promote diversity and equality, and support the professional development of employees.
- Conduct an active dialogue and cooperation with stakeholders, including local communities, business partners and non-governmental organizations, in order to jointly implement the set sustainable development goals.
- Transparently report sustainability issues using the European Sustainability Standards (ESRS), integrating them with financial information. Sustainability reporting is carried out on a cyclical basis, as an integral part of the annual reporting obligations.

### Stakeholder collaboration and engagement

The KGHM Group maintains constant contact with stakeholders, taking into account their expectations and needs in the decision-making process. It cooperates with international and industry organizations and representatives of local communities, striving to jointly achieve the goals of sustainable development. Openness to dialogue and transparency of activities are the foundation of the KGHM Group's relations with its stakeholders.

## Monitoring and reporting

The KGHM Group regularly monitors progress towards the achievement of its sustainable development goals. Performance information is presented as part of sustainability reporting and is publicly available to all stakeholders.

## References to standards and initiatives

The Sustainable Development Policy of the KGHM Group has been developed in a way that ensures its consistency with:

- The UN 2030 Agenda for Sustainable Development
- OECD Guidelines for Multinational Enterprises
- UN Guiding Principles on Business and Human Rights
- European Sustainability Reporting Standards (ESRS)
- The Integrated Management System – based on ISO standards

## References to internal documents

The Policy is closely related to the internal regulations already in force in KGHM Polska Miedź S.A. and the KGHM Group, covering the following aspects:

### Environmental

- Environmental Policy
- Climate Policy
- Energy Policy
- Decarbonization Program

### Social

- Code of Ethics in the KGHM Group
- Safety Policy
- Responsible Supply Chain Policy in the KGHM Group
- Diversity Declaration
- Human Rights Policy
- Corporate Social Responsibility (CSR) Policy

### Governance

- Management Systems according to ISO standards
- Information Security Policy of the KGHM Group
- Corporate Risk Management Policy of the KGHM Group
- Compliance Management Policy of the KGHM Group
- Business Continuity Management Policy of the KGHM Group
- Remuneration Policy
- Competition Law Policy of the KGHM Group
- Procurement Policy of the KGHM Group
- Anti-Corruption Policy of the KGHM Group
- Privacy Policy and Personal Data Processing Policy

## Final provisions

The Policy will be subject to periodic reviews and updates in order to adapt its provisions to the changing internal and external conditions, as well as to emerging challenges and the expectations of stakeholders. It is a framework document, which sets out the directions for responsible action and supports the achievement of the KGHM Group's long-term strategic goals.

The Sustainable Development Policy, adopted by the Management Board of KGHM Polska Miedź S.A., is applicable to the entire KGHM Group, and is generally available and known to employees and other persons working for the KGHM Group.

The Management Board of KGHM Polska Miedź S.A. declares its support for the activities arising from this Policy and commits to provide adequate resources and means to achieve its objectives and tasks.

1<sup>st</sup> edition

Lubin, 27 August 2025

President of the Management Board

