

CONTRACTOR'S CHARTER

KGHM Polska Miedź S.A. (KGHM), as one of the leading companies in the mining and metallurgical sector, is firmly committed to conducting its business in a responsible, sustainable and transparent manner. Our priority is to uphold the principles of responsible business conduct, respect human and labour rights, protect the environment, and ensure the highest ethical, environmental and organizational standards throughout our value chain.

To ensure the integrity and credibility of our operations, KGHM implements due diligence processes in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals and the Copper Mark Joint Due Diligence Standard. This means that we identify, assess and manage risks associated with the sourcing of materials, in particular from conflict-affected and high-risk areas (CAHRAs), in order to prevent adverse social, environmental and economic impacts.

We believe that achieving these objectives is only possible in cooperation with our business partners. Therefore, we expect each KGHM contractor not only to be familiar with, but also to actively implement, the principles set out in the Contractor's Charter, the Human Rights Policy, the Code of Ethics and the Responsible Supply Chain Policy. We are convinced that a shared commitment to these standards contributes to building a culture of responsibility in which human rights, occupational health and safety, business integrity, environmental protection and risk management are treated as fundamental values and embedded in daily practice.

Link to KGHM Codes and Policies: <https://kgmh.com/pl/inwestorzy/esg/kodeksy-i-polityki>

Link to the Responsible Supply Chain Policy: <https://kgmh.com/pl/biznes/produkty/odpowiedzialny-lancuch-dostaw>

ETHICAL STANDARDS AND RESPONSIBLE SUPPLY CHAIN

ETHICS AND BUSINESS INTEGRITY

The Contractor undertakes to strictly comply with the prohibition of all forms of corruption in relation to business partners and public officials. The acceptance or offering of gifts, gratuities or other material benefits is unacceptable, except for minor, customary gestures of courtesy compliant with applicable law and KGHM's policies. All potential conflicts of interest, including family, capital or business relationships with persons involved in the procurement process, are identified and promptly reported to KGHM. The Contractor ensures the possibility of reporting irregularities (whistleblowing) and undertakes to maintain tax transparency, to fulfil its obligations with respect to the payment of public levies to the state and local government units, and not to apply illegal forms of tax avoidance or other fees.

ANTI-MONEY LAUNDERING AND COUNTER-TERRORIST FINANCING

The Contractor undertakes not to engage in activities that may directly or indirectly finance armed groups, terrorist organizations or entities violating human rights. The Contractor implements appropriate procedures aimed at preventing money laundering and the financing of criminal activities, and monitors transactions for the purposes of counteracting money laundering and terrorist financing. The Contractor does not establish business relationships with entities subject to international sanctions (UN, EU, USA, UK, Canada, Poland).

RISK MANAGEMENT AND SUPPLY CHAIN DUE DILIGENCE

The Contractor implements and applies due diligence procedures consistent with the OECD Due Diligence Guidance, aimed at identifying, assessing, and mitigating risks related to the origin of raw materials, working conditions, environmental impacts, and business ethics throughout the supply chain. Particular attention is given to preventing the illegal or unethical sourcing of materials from conflict-affected and high-risk areas (CAHRA). The Contractor shall provide KGHM with information regarding identified risks and non-conformities, cooperate in the implementation of corrective actions, and ensure transparency regarding the origin of sourced materials. The Contractor commits to continuously improving management standards, adopting new solutions, and participating in training and development programmes related to responsible business conduct.

TRANSPARENCY AND REPORTING

The Contractor conducts its activities in a transparent manner and undertakes to provide information regarding the supply chain and to cooperate in audits and inspections. The Contractor ensures transparent disclosure of information on the origin of raw materials and all tiers of the supply chain at KGHM's request. The information provided is reliable, complete and consistent with the actual state of affairs. The Contractor undertakes to cooperate in the implementation of corrective measures in the event of identified non-compliances and to report any suspicions of breaches or risks in the areas of ethics, environment, human rights and safety.

HUMAN RIGHT

The Contractor guarantees full respect for human rights in accordance with the UN Guiding Principles on Business and Human Rights (UNGPs). Any discriminatory practices based on gender, age, race, skin color, nationality, religion, political beliefs, sexual orientation, disability or any other characteristic are prohibited. Mobbing, harassment, violence, violation of the personal dignity of employees and associates, as well as violations of privacy and personal data protection, are unacceptable. The Contractor does not employ persons below the legally defined minimum age and does not use forced, bonded or exploitative labour. Educates employees on human rights through training or educational programs.

LABOUR RIGHTS

The Contractor undertakes to comply with national and international labour standards, including employees' rights to freedom of association, to collective bargaining, to fair remuneration and to rest. The Contractor provides a working environment based on respect for dignity, employment stability, opportunities for professional development and equal treatment. The Contractor counteracts all forms of discrimination, harassment and violence, and ensures the comfort and safety of employees at every stage of cooperation. The Contractor does not use any forms of forced labour, child labour or exploitation.

OCCUPATIONAL HEALTH AND SAFETY

The Contractor undertakes to ensure safe and hygienic working conditions for all employees, subcontractors and third parties present on the premises. All occupational risks are systematically identified, assessed and mitigated. Employees are provided with access to appropriate training, personal protective equipment and regular education in the field of occupational health and safety (OHS). The Contractor undertakes to report all accidents and incidents and to continuously improve its occupational safety practices in accordance with best industry standards and applicable legal regulations.

ENVIRONMENTAL PROTECTION

The Contractor undertakes to conduct its activities in an environmentally responsible manner, with respect for the principles of sustainable development and the protection of natural resources. The Contractor implements measures aimed at minimizing negative impacts on the natural environment, including the rational use of resources, reduction of emissions of pollutants to air, water and soil, as well as proper management of waste and hazardous substances. The Contractor complies with all applicable environmental laws and regulations, as well as environmental standards, both in its operational activities and in relation to the products and services provided to KGHM. The Contractor undertakes to take corrective actions in the event of identified non-compliances, strives for the continuous improvement of environmental practices, and raises employees' awareness of environmental protection.

CONTRACTOR'S DECLARATION

In the event that KGHM identifies activities inconsistent with ethical standards or good practices set out in the Contractor's Charter, KGHM reserves the right to take appropriate measures, including requesting corrective actions or exercising its contractual rights, as well as undertaking other actions in accordance with applicable laws and KGHM's internal policies. Recognizing KGHM's commitment to responsible business conduct and due diligence, I hereby confirm, as a Contractor of KGHM, that:

- I have read, understood and agree to comply with the principles set out in the Contractor's Charter, the Human Rights Policy, the Code of Ethics and the Responsible Supply Chain Policy, available on KGHM's corporate website;
- I declare compliance with the above principles and undertake to promptly inform KGHM, without prior request, of any instance of non-compliance, actual risk or suspected breach of these principles;
- I undertake to promote and implement these principles throughout my supply chain and among my business partners;
- I understand and accept that failure to comply with the principles set out in the Contractor's Charter may result in the suspension or termination of contracts between the parties.

Contractor's Name: _____
 Full Name: _____
 Position/Title: _____

Date: _____
 Signature: _____