

ANTI-CORRUPTION POLICY OF THE KGHM GROUP

Effective management of anti-corruption activities is fundamental to the security, sustainable development, and values of the KGHM Polska Miedź S.A. Group ("KGHM Group"). It directly affects the image of our organization as a stable and responsible employer and business partner conducting its activities in a transparent manner with respect for universal standards of business ethics and integrity, which are defined in the KGHM Code of Ethics.

With this in mind, throughout the KGHM Group, we have adopted and strictly adhere to the principle of **"zero tolerance for corruption,"** with simultaneous compliance with the legislation and voluntary anti-corruption commitments applicable to our organization. Our priority in managing anti-corruption activities is to eliminate factors that increase the risk of corruption within our business operations, including countering conflicts of interest. This reflects an approach based on the principle of **"prevention first."**

The KGHM Group's top management has declared their full commitment to maintaining and continuously improving the Anti-Corruption Activities Management System in accordance with the requirements of PN-ISO 37001.

All employees and associates of KGHM Group entities, as well as their partners, suppliers, and customers, are required to comply with this Policy, which includes acting with integrity and honesty, in accordance with the following principles:

- It is prohibited to engage in any behavior that has the hallmarks of corruption and that involves offering, promising, giving, accepting, demanding, or soliciting undue benefits, whether financial or non-financial, particularly in connection with the performance of official duties.
- Every employee, regardless of the type of contract binding on him or her, is obliged to avoid conflicts of interest, and if a conflict of interest arises or is likely to arise, is required to disclose it.
- No retaliation of any kind is permitted against those who have refused to give or accept undue benefits. This includes cases that may result in the loss of business opportunities for KGHM Group entities.
- Any person who is involved in or witnesses an incident bearing the hallmarks of corruption, or who has information about such an incident, is required to report it immediately.

The top management is committed to providing those reporting actual or suspected corruption incidents with dedicated, confidential channels of communication and protection from retaliation.

Disciplinary proceedings are initiated for persons guilty of violating this Policy and anti-corruption regulations. In a situation where a violation of the law is disclosed, we report and cooperate in the investigation with the relevant state authorities.

The top management is committed to appointing individuals to ensure anti-corruption compliance and to giving them the appropriate authority, while maintaining their complete independence and impartiality.

This Policy, adopted by the Management Board of KGHM Polska Miedź S.A., is in force throughout the Company and is generally available and known to employees and other persons working for the Company.

The Management Board of KGHM Polska Miedź S.A. declares its support for the measures resulting from this Policy and the provision of adequate resources and means for its implementation.

2nd edition

Lubin, July 12, 2023.



President of the
Management Board