



ANTI-CORRUPTION POLICY OF THE KGHM GROUP

Effective management of anti-corruption activities is of fundamental importance for the safety of the KGHM Polska Miedź S.A. Capital Group (KGHM Group), its sustainable development and values. It translates directly into the image of our organisation as a stable and responsible employer and business partner conducting its operations in a transparent manner with respect for universal standards of business ethics and integrity, as defined in the Code of Ethics of the KGHM Group.

With this in mind, throughout the KGHM Group we have adopted and strictly adhere to the principle of **"zero tolerance of corruption"**, while at the same time maintaining compliance with legal regulations applicable to our organisation and with voluntary anti-corruption undertakings. Our priority in managing anti-corruption activities is to eliminate factors that increase the risk of corruption within our business activities. This reflects an approach based on the principle of **"prevention first"**.

The top management of the KGHM Group declares its full commitment to activities relating to the maintenance and continuous improvement of the Anti-Corruption Activities Management System in accordance with the requirements of standard PN-ISO 37001.

All employees and associates of entities of the KGHM Group, as well as partners, suppliers and clients, are obliged to comply with this Policy, including to act in a reliable and honest manner, in accordance with the following principles:

- It is prohibited to engage in any form of corrupt conduct by offering, promising, giving, accepting, demanding or soliciting any undue advantage, whether financial or non-financial, in particular in connection with performance of their professional duties.
- It is prohibited to retaliate in any manner whatsoever against any person who has refused to give or accept any improper advantage. This also applies to cases which may result in the loss of business opportunities for entities within the KGHM Group.
- Any person involved in or witnessing or having information about an incident involving corruption shall report it immediately.

Top management is committed to providing those who report actual or suspected corrupt incidents with dedicated, confidential channels of communication while protecting them from retaliation.

Disciplinary proceedings shall be initiated for those found guilty of violating this Policy and the anti-corruption regulations. Should a legal violation be discovered, we will report it and cooperate in the investigation with the relevant state authorities.

Top management is committed to appointing anti-corruption compliance officers, empowering them while maintaining their complete independence and impartiality.

This Policy, adopted by the Management Board of KGHM Polska Miedź S.A., has been communicated and is generally available to employees, business partners and persons working for or on behalf of our organisation.

Together with the Management Board, I pledge to support the actions arising from this Policy and to ensure that adequate resources and means are provided to achieve the objectives and actions set out herein.

Lubin, 05.11.2021

President of the Management Board

A handwritten signature in black ink, appearing to read "M. Chlebowski".