

KGHM Metraco S.A., as a member of the Capital Group of KGHM Polska Miedź S.A., implements the guidelines of the Anti-Corruption Policy of the Capital Group of KGHM, which is an integral part of this Policy and is attached thereto.

The main objective of KGHM Metraco S.A. is to meet the requirements and expectations of its clients and stakeholders in the areas of: the trade in copper scrap and other metals; production of ammonium perrhenate, rhenium pellets and powder; production of, and trade in, aggregates; waste processing; trade in raw materials and chemicals; storage of, and trade in, road salt; and storage of sulfuric acid – with full transparency and business integrity.

The Company does not tolerate any type of corruption. This would be contrary to the values of the Company and the Capital Group of KGHM. The Anti-Corruption Policy applies to all our employees, as well as business partners and stakeholders.

The company strives to prevent corruption incidents and develop high anti-corruption awareness, in which every employee and business partner accepts responsibility for the transparency of the processes carried out.

As part of the Anti-Corruption Management System, the Board of Directors of the Company has appointed the following officers and ensures their independence through their adequate placement in the organizational structure of the Company and through relevant provisions of the Organizational Regulations:

- The Ethics and Anti-Corruption Officer who supervises the Anti-Corruption Management System and fights corruption;
- The Integrated Management System Officer who supervises compliance of the Anti-Corruption Management System with the requirements of the PN-ISO 37001:2017 standard.

In order to fulfill the above goals, the Board of Directors of KGHM Metraco S.A. has implemented, maintains and continually improves the Anti-Corruption Management System compliant with international standard PN-ISO 37001:2017 and strives to:

- Meet legal and other requirements applicable to the Company is obliged;
- Set performance standards higher than the minimum set by the law and good practices;
- Identify consistently workplaces, processes and persons, or cooperating units, particularly exposed to the risk of corruption;
- Prevent and combat all forms of corruption.

KGHM Metraco S.A. shall achieve the above objectives by:

- Implementing and applying a system for identification, assessment and dealing with corruption risks;
- Providing financial and other supervision measures to prevent corruption;
- Cooperating with employees and business partners who accept and share our mission and Anti-Corruption culture;
- Building conflict of interest-free relationships with employees, business partners and suppliers;
- Conducting internal audits and management reviews by the Company's Board of Directors and the Supervisory Board in order to verify the functioning and ongoing improvement of the Anti-Corruption Management System;
- Encouraging the reporting of concerns in good faith or based on reasonable belief without fear of retaliation;
- Enabling the reporting of doubts by e-mail (etyka@metraco.pl) or by other implemented and accepted communication channels;
- Providing adequate technical, financial and competence resources for staff to achieve the established objectives and tasks within the scope of the implemented system;
- Raising everyone's concern for acting in compliance with the adopted rules.

At this point we emphasize that non-compliance with the Anti-Corruption Policy or the guidelines of the Anti-Corruption Management System will result in the negative consequences provided for by the law and by internal regulations of the Company. Any attempt at corrupt activities by a business partner shall result in the termination of the cooperation.

Accordingly, the Board of Directors declares and undertakes to protect whistleblowers reporting potential or actual manifestations of corruption in good faith or based on reasonable belief. The reporting person will not be exposed to retaliation, discrimination or disciplinary action in connection with the report. All Employees are hereby obliged, and business partners are recommended, to comply with this Anti-Corruption Policy and the guidelines of the Anti-Corruption Management System.

This Anti-Corruption Policy was adopted on April 21, 2021, by Resolution 48/VI/2021 of the Board of Directors.



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