

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 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