



INFORMATION SECURITY POLICY OF THE KGHM GROUP

Information security is crucial for business continuity and the achievement of the goals of the KGHM Polska Miedź S.A. Group (KGHM Group). This translates into our obligation to protect information and supporting assets. We strive to make our approach to information security management respond to current external and internal threats, to make it fully integrated with our operations and business processes, allowing them to be run in a secure and responsible manner. For this purpose, as part of the Integrated Management System, an Information Security Management System, compliant with the requirements of PN-EN ISO/IEC 27001, has been established, implemented, maintained and continuously improved.

Our key objectives/principles concerning the Integrated Management System are:

- Continuous identification and assessment of threats as well as information security risk management.
- Ensuring the confidentiality, availability, integrity and authenticity of all data and information, considered relevant from the point of view of the interests of the KGHM Group and our stakeholders.
- Compliance with applicable laws and other requirements related to information security.
- Application of the principle of adequacy and proportionality of safeguards on the basis of an impact analysis, risk analysis and experience-based improvement.

Aware of the key role of information security for the value and image of the KGHM Group, the top management:

- Provides the resources and tools necessary to maintain, monitor and improve the Information Security Management System.
- Supports raising the awareness and competencies of employees and co-workers in the field of information security.
- Ensures the use of appropriate and proportional technical, operational and organizational measures to mitigate information security risks.

All employees and co-workers of the KGHM Group are responsible for complying with this Policy, guidelines, procedures and instructions arising herefrom. Our commitment to protect information is key to achieving our goals, including maintaining the trust of our customers, partners and other stakeholders.

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

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.

1st edition

Lubin, 15 November 2023 r.

A handwritten signature in blue ink, appearing to be 'BAS'.

President of the Management Board