



KONKOLA COPPER MINE PLC
COMPANY POLICY
BUSINESS PARTNER AND SUPPLIER CODE OF CONDUCT AND ETHICS

Policy No:	KCM -P-137	Revision No: 0
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Originator:	Chief Commercial Officer	
Owner	Chief Commercial Officer	
Information Classification	NR	

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Approved By: Chief Commercial Officer	Signature: 
	Effective Date, Revision 0: 15.05.2026

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1.0 Introduction

Konkola Copper Mines Plc ("KCM") is committed to conducting business with integrity, transparency, accountability, fairness, sustainability, and in compliance with all applicable laws and ethical standards.

This Supplier and Business Partner Code of Conduct and Ethics ("Code") establishes the minimum ethical, legal, environmental, social, safety, and governance standards expected from all Business Partners conducting business with KCM.

KCM expects all Business Partners to operate in a manner consistent with:

- a) KCM values and governance standards;
- b) Applicable laws and regulations;
- c) Internationally recognised human rights standards;
- d) Environmental, social and governance (ESG) principles; and
- e) The principles contained in the Vedanta Resources Supplier Code of Conduct.

This Code embodies KCM's commitment to internationally recognised standards, including:

- a) The Core Conventions of the International Labour Organization (ILO);
- b) The United Nations Universal Declaration of Human Rights;
- c) Applicable Anti-Corruption laws;
- d) Occupational health and safety standards;
- e) Environmental sustainability standards; and
- f) All other relevant Statutory Obligations applicable within the Republic of Zambia.

Compliance with this Code is mandatory and forms part of the contractual obligations between KCM and its Business Partners.

Business Partners shall comply with all applicable local and international laws, regulations, directives, standards, licences, permits, and regulatory requirements governing their operations and business relationship with KCM.

- 1.1 Compliance to Laws of the land** – The policies and Procedures of Konkola Copper Mine Plc shall be in conformity with the Constitution of the country and the whole body of laws. However, due to changes in law / regulations and other factors, there may be inadvertent conflicts in which case the Constitution and / or the statutes shall to the extent of the contravention take precedent over this policy.

2.0 Scope

This Code applies to all Business Partners conducting business with KCM, including but not limited to:

- a) Suppliers;
- b) Contractors;

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- c) Consultants;
- d) Agents;
- e) Service providers;
- f) Joint venture partners;
- g) Subcontractors;
- h) Vendors; and
- i) Other third parties acting on behalf of or representing KCM.

Business Partners are responsible for ensuring that their employees, subcontractors, agents, and representatives comply with this Code.

3.0 Definitions

Term	Definition
Business Partner	Any external individual or entity providing goods or services to KCM or acting on behalf of KCM.
KCM	Konkola Copper Mines Plc
Laws	Applicable laws, Acts of Parliament, Statutory Instruments, directives, and regulations in force within the Republic of Zambia
ESG	Environmental, Social and Governance
Conflict of Interest	Any situation where personal interests improperly influence business judgment or decision-making

4.0 Responsibilities

Business Partners shall:

Comply with this Code and all applicable laws;

- a) Communicate the requirements of this Code to their employees, agents, and subcontractors;
- b) Ensure appropriate awareness and training relating to ethical conduct;
- c) Establish systems for monitoring compliance;
- d) Cooperate fully with KCM investigations, audits, and reviews;
- e) Maintain accurate records demonstrating compliance with this Code; and
- f) Promptly report any suspected violations of this Code.

5.0 Policy

5.1 Compliance and Applicable Laws and Regulations

Business Partners shall comply with all applicable national and international laws including the following:

- a) Labour laws;
- b) Human rights laws;
- c) Environmental laws;

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- d) Competition laws;
- e) Anti-corruption laws;
- f) Health and safety laws; and
- g) Industry regulations.

Compliance with this Code shall be a mandatory condition for entering into and maintaining a business relationship with KCM.

5.2 Labour and Human Rights

Business Partners shall uphold recognised human rights standards and:

- a) Ensure that employment is freely chosen;
- b) Prohibit forced labour, bonded labour, prison labour, child labour, human trafficking, and modern slavery;
- c) Respect employees' rights to freedom of association and lawful collective bargaining;
- d) Provide equal employment opportunities;
- e) Maintain workplaces free from discrimination, harassment, victimisation, and retaliation;
- f) Comply with applicable laws regarding working hours, overtime, minimum wages, leave, and statutory benefits;
- g) Ensure employees are treated with dignity and respect;
- h) Ensure workers are not charged recruitment fees;
- i) Refrain from confiscating identity documents, work permits, or travel documents;
- j) Conduct due diligence within their own supply chains to ensure compliance with these principles.

5.3 Health, Safety and Environment

Business Partners shall:

- a) Provide safe and healthy working conditions;
- b) Comply with all occupational health and safety laws;
- c) Adhere to KCM Environmental, Health and Safety (EHS) requirements;
- d) Ensure employees are adequately trained on safety matters;
- e) Maintain systems for identifying and mitigating workplace risks;
- f) Report incidents, unsafe conditions, and environmental breaches promptly.

Business Partners shall conduct operations responsibly and minimise environmental impacts through:

- Pollution prevention;
- Proper waste management;
- Energy efficiency;
- Responsible water use;
- Biodiversity protection; and
- Sustainable environmental practices.

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5.4 Sustainability and ESG Commitment

Business Partners are expected to support KCM's sustainability objectives and adopt responsible Environmental, Social and Governance (ESG) practices within their operations and supply chains.

Business Partners shall:

- a) Promote sustainable sourcing practices;
- b) Reduce environmental impacts where reasonably practicable;
- c) Support climate and environmental protection initiatives;
- d) Operate responsibly within surrounding communities; and
- e) Conduct business in a socially responsible manner.

5.5 Business Integrity

Business Partners shall conduct business honestly, fairly, transparently, and ethically at all times.

Business Partners shall not engage in:

- a) Fraud;
- b) Dishonesty;
- c) Theft;
- d) Misrepresentation;
- e) Falsification of records;
- f) Unethical procurement practices;
- g) Collusion;
- h) Bid-rigging; or
- i) Any conduct likely to damage KCM's reputation

5.6 Anti-Bribery and Anti- Corruption

KCM maintains a zero-tolerance approach to bribery and corruption.

Business Partners shall not directly or indirectly:

- a) Offer, promise, give, solicit, or accept bribes, kickbacks, facilitation payments, or improper advantages;
- b) Influence business decisions through unethical means;
- c) Use family, social, political, or personal connections to obtain preferential treatment;
- d) Enter into relationships with KCM employees that create actual, potential, or perceived conflicts of interest;
- e) Offer gifts, hospitality, entertainment, or benefits intended to improperly influence decisions;
- f) Engage in any conduct that violates applicable anti-corruption laws.
- g) Business Partners shall promptly disclose any actual, potential, or perceived conflicts of interest involving KCM employees.

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- h) Business Partners shall not actively recruit or solicit KCM employees for employment opportunities without prior disclosure to and approval from KCM.

5.7 Ethical Procurement Practices

Business Partners shall participate in procurement and tendering processes fairly, transparently, and honestly.

Business Partners shall not:

- a) Collude with competitors;
- b) Submit false or misleading information;
- c) Manipulate procurement outcomes;
- d) Engage in price fixing; or
- e) Obtain confidential procurement information improperly.

5.8 Fair Competition

Business Partners shall comply with all applicable competition and anti-trust laws and shall refrain from anti-competitive, deceptive, or unfair trade practices.

5.9 Reporting of Unethical Conduct and Whistleblower Protection

Business Partners shall:

- a) Establish effective grievance and reporting mechanisms;
- b) Allow employees to raise concerns confidentially and without fear of retaliation;
- c) Promptly report suspected fraud, corruption, unethical conduct, discrimination, or misconduct involving KCM employees or contractors;
- d) Cooperate fully in investigations.
- e) Business Partners shall not retaliate against any person who, in good faith, reports suspected misconduct or violations of this Code.
- f) Reports may be made in accordance with KCM's Whistle-blower Policy.

5.10 Confidentiality, Data Protection and Cyber Security

Business Partners shall:

- a) Protect KCM confidential and proprietary information;
- b) Use information solely for authorised purposes;
- c) Prevent unauthorised access, disclosure, misuse, or loss of information;
- d) Implement reasonable cybersecurity controls and safeguards;
- e) Comply with applicable data protection and privacy laws.
- f) Confidential information shall not be disclosed to third parties without prior written consent from KCM.

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5.11 Intellectual Property

Business Partners shall respect and protect KCM intellectual property rights, including:

- a) Trade secrets;
- b) Proprietary information;
- c) Systems;
- d) Technology;
- e) Trademarks; and
- f) Copyrighted materials.

5.12 Third Party Representation

Business Partners shall not represent KCM or use KCM's name, logo, trademarks, or branding without prior written approval.

Where authorised to represent KCM, Business Partners shall:

- a) Act within the approved scope of authority;
- b) Comply with KCM ethical standards;
- c) Maintain confidentiality of information received.

5.13 Prohibition on Insider Trading

Business Partners who become aware of material non-public information relating to KCM or its affiliates shall not:

- a) Buy or sell securities using such information;
- b) Share such information for personal or commercial gain.

5.14 Supply Chain Responsibility

- a) Business Partners shall ensure that this Code is communicated, implemented, and cascaded throughout their own supply chains.
- b) Business Partners shall exercise due diligence to ensure that subcontractors, suppliers, consultants, and agents comply with standards consistent with this Code.

5.15 Compliance Commitment, Audit Rights and Monitoring

As a condition of doing business with KCM, Business Partners shall:

- a) Read, acknowledge, and comply with this Code;
- b) Maintain adequate records demonstrating compliance;
- c) Permit KCM and/or authorised representatives, upon reasonable notice, to conduct compliance reviews, audits, inspections, and due diligence assessments;
- d) Promptly notify KCM of any known or suspected violations relating to dealings with KCM.
- e) Business Partners may periodically be required to certify compliance with this Code.

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5.16 Consequences of Non-compliance

Failure to comply with this Code may result in:

- a) Corrective action plans;
- b) Suspension of work;
- c) Contract termination;
- d) Blacklisting;
- e) Disqualification from future business opportunities;
- f) Reporting to regulatory or law enforcement authorities; and/or
- g) Legal action where applicable

5.17 Governance and Oversight

Oversight of this Code shall be provided by the Commercial Department in collaboration with Compliance & Ethics, Legal, and relevant governance structures of KCM.

6.0 Supporting Information

Reference	Description
KCM-P-02	Whistleblower Policy
KCM-CP-04	Declaration of Interests
KCM-P-72	Human Rights Policy
KCM-P-29	Anti-Bribery and Anti-Corruption Policy
KCM-P-61	Anti-Trust Guidance Notes

7.0 Review

The Policy shall be reviewed once in two years or as and when there is change in operations.

8.0 Related documents

Reference No.	Document Name

9.0 Amendment Register

Document No.	Page Amended	Revision No.	Amendment Date
KCM-P-137	-	-	-

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