

SPEAK UP POLICY

INTRODUCTION

KAZ Minerals is committed to developing a culture of openness across all its businesses and ensuring the highest standards of probity and accountability. If an issue is raised promptly and acted upon, it is likely to reduce the severity of any negative impact and to deter any further wrongdoing.

KAZ Minerals actively encourages the prompt reporting of any awareness of or concerns about, any conduct that is unlawful or in breach of KAZ Minerals' policies, any financial malpractice or any acts or omissions which could endanger a person or result in environmental damage. KAZ Minerals will ensure that all allegations are thoroughly investigated and that, where necessary, suitable action is taken.

KAZ Minerals will not take action against or penalise and will not tolerate retaliation against, anyone who in good faith seeks advice, raises a concern or makes a report in accordance with this Policy.

PURPOSE

This Policy explains how employees and other individuals can raise concerns and on which matters and the action that will be taken.

SCOPE

The Policy applies to all KAZ Minerals officers and employees (permanent, contract and temporary), secondees and agency staff (each an "Internal Individual"), and suppliers, consultants, agents, distributors and any other persons acting on behalf of any member of the Group and any person with whom any member of the Group does business (each an "External Individual"). Where appropriate in this Policy, Internal Individuals and External Individuals are referred to collectively as either an "Individual" or as "Individuals."

Individuals should report concerns regarding the conduct of KAZ Minerals, its employees or anyone acting on behalf of KAZ Minerals. Managers are encouraged to actively publicise the availability of this service to KAZ Minerals' partners.

POLICY

KAZ Minerals encourages Individuals to raise their concerns about any incidents of malpractice or misconduct in the workplace at the earliest possible stage. KAZ Minerals recognises that an Individual may not have all the information about a particular concern, but this should not be a reason for a delay in raising the concern.

Below is a non-exhaustive list of matters that should be reported:

- Acts or omissions which could endanger the health and safety of any person;
- A criminal or administrative offence;
- The use of deception by KAZ Minerals, its employees or its business partners to obtain an unjust or illegal financial advantage, either for the business unit or personally;
- Intentional misrepresentations directly or indirectly affecting financial statements;
- A material failure to comply with any legal obligations or internal policies or procedures;
- Acts or omissions by KAZ Minerals or its employees which may cause damage to the environment;
- A serious breach of internal financial controls;
- Blackmail, corruption, tax evasion or bribery;
- Serious non-professional or unethical behaviour; and
- The deliberate concealment of information relating to any of the matters listed above.

KAZ Minerals will not tolerate retaliation against any Individuals who in good faith seek advice, raise a concern or report any malpractice, misconduct or violation of law. KAZ Minerals will ensure the protection of Internal Individuals against harassment, victimisation or disciplinary action as a result of raising such concerns; any Internal Individual who knows or suspects that retaliation has taken place should report it directly to their divisional Compliance Officer or the Chief Compliance Officer in Kazakhstan or Kyrgyzstan or the Company Secretary in Dubai or through the Speak Up facility. Internal Individuals who participate or assist in an investigation will also be protected.

Raising a concern

An Internal Individual who reasonably believes that inappropriate business conduct, or a violation of law or internal regulations is occurring or has taken place, should initially raise the issue in writing with his/her line manager, who will generally be closest to the situation and be best able to help and to resolve the matter promptly. If this is not appropriate, the Internal Individual should raise the issue with his/her head of department or divisional Compliance Officer or the Chief Compliance Officer in Kazakhstan or Kyrgyzstan, or the Company Secretary in Dubai.

An External Individual who reasonably believes that inappropriate business conduct or a violation of law is occurring or has taken place should initially raise the issue in writing with his/her KAZ Minerals contact.

However, if Individuals are uncomfortable using one of the internal reporting routes, they have the option to report concerns through an independent third party via the Speak Up facility. The available methods for submitting a report through Speak Up are set out below.

(a) Telephone

Individuals may wish to raise concerns via the global hotline on +7 (771) 929 2511, which is accessible from any country worldwide. Live operators are available between 09:00 and 18:00. Outside of these hours, an automated service records the substance of the report, which is then submitted through the system for further processing.

(b) Email

Individuals may submit reports via email to svc-replyspeakup@kazminerals.com.

KAZ Minerals encourages Individuals to provide as much detail as possible to avoid delays in the investigation process resulting from incomplete information.

(c) Speak Up Website

Individuals may submit a report online through the Speak Up website, accessible at <https://speakup.kazminerals.com/>.

All matters raised in accordance with this Policy will be reported to the Chief Compliance Officer, the Head of Legal Control and the Company Secretary in Dubai who will, as appropriate, report the occurrence to the Chief Executive Officer, the Chair of the Supervisory Board, the Chair of the Audit Committee or the Chair of the Health, Safety and Sustainability Committee (HSS Committee).

Individuals are encouraged to provide their name and contact details when making a report via the Speak Up facility to help facilitate the subsequent investigation and to enable them to be informed of the outcome of the investigation. However, Individuals are also able to raise a concern anonymously.

Action by KAZ Minerals

KAZ Minerals' primary aim is to prevent workplace malpractice, misconduct and violation of law or internal regulation from occurring in the first place. If it happens, it is KAZ Minerals' objective to stop it promptly and prevent it from recurring.

Following initial investigation, if the concern raised is found to be valid, KAZ Minerals may take one or more of the following steps (which is a non-exhaustive list):

- refer the matter to local management with details of the findings of the investigation and recommended actions;
- refer the matter to the local HR team or the Group HR Director with details of the findings of the investigation and recommended actions;
- refer the matter to the Executive Committee with a view to a formal, internal investigation being carried out;
- refer to a technical expert;
- refer the matter to the Supervisory Board and/or the Audit Committee or HSS Committee; or
- refer the matter to the appropriate external regulatory body for further investigation.

Unless a concern has been raised anonymously or there are other exceptional circumstances, Individuals will be informed of the outcome of the investigation. This communication will be provided either directly or via the Speak Up facility.

Individuals who believe that a reported matter has not been appropriately investigated, or that they have not received a satisfactory response, may raise their concerns in writing with the

Chair of the Audit Committee, or with the Company Secretary in Dubai at cosec@kazminerals.com, or via the Speak Up telephone line using the contact details set out above.

Confidentiality

Provided an Individual has raised a concern in good faith, his or her identity will not be disclosed at any time by KAZ Minerals unless necessary to obtain legal advice, or to comply with a legal or regulatory obligation. In addition, if it would be necessary, for the purposes of pursuing an investigation to disclose the Individual's identity, KAZ Minerals may do so provided the prior consent of the Individual has been sought and obtained and any relevant legal requirements have been complied with.

So far as possible, any supporting evidence relating to the disclosure will be kept secure at all times.

Disciplinary and other actions

If the claim of malpractice, misconduct or violation of law or internal regulations is substantiated, appropriate disciplinary or other actions in accordance with relevant laws and/or KAZ Minerals' internal policies and regulations will be taken against those responsible.

Any act of retaliation or victimisation against an Internal Individual who raises a concern in good faith will result in disciplinary or other action in accordance with relevant laws and/or KAZ Minerals' internal policies and regulations.

If an Individual raises a concern in good faith, whether or not it is confirmed by subsequent investigation, no action will be taken against him or her. However, any malicious or unfounded allegations will result in disciplinary or other appropriate actions being taken in accordance with applicable laws and KAZ Minerals' internal policies and procedures.

**Approved by the Supervisory Board of KAZ Minerals International FZCO
on 2 July 2026.**