

### **Introduction**

KAZ Minerals Limited is a UK subsidiary of the KAZ Minerals International DMCC group (hereinafter 'KAZ Minerals' or 'the Group'). The Group's mining operations in Kazakhstan and Kyrgyzstan were indirectly held by KAZ Minerals Limited until 28 May 2024, following which they became held by a non-UK subsidiary of the Group. KAZ Minerals is committed to ensuring the absence of modern slavery both within its business and in its supply chain and this statement sets out the steps we have taken to prevent it. KAZ Minerals is one of Kazakhstan's highest profile companies. With this economic strength comes a corporate responsibility to protect and respect our employees and contractors, their families and the local environment. All employees are paid above the minimum wage and in Kazakhstan they are paid above the living wage, as defined by the Government of Kazakhstan. We respect the right of our workers to freedom of association, and we communicate with our employees and trade unions and consult them about changes to our business and employment conditions.

### **Our business, structure and supply chain**

KAZ Minerals is a high growth copper company focused on large scale, low cost, open pit mining in Kazakhstan and Kyrgyzstan. It operates the Aktogay and Bozshakol open pit copper mines in the Abay and Pavlodar regions of Kazakhstan, three underground mines and associated concentrators in the East Region of Kazakhstan and the Bozymchak copper-gold mine in Kyrgyzstan. In 2024, total copper production was 380 kt with by-products of 146 koz of gold, 3,728 koz of silver and 43 kt of zinc in concentrate. The Group's total turnover was \$4,139 million. The majority of the Group's copper concentrate is supplied to smelter customers in China and zinc concentrate from the East Region is sold to customers in Kazakhstan, China and the CIS. East Region and Bozymchak copper concentrate (and some material from Aktogay and Bozshakol) is toll processed into cathode at the Balkhash smelter in Kazakhstan.

During 2024, the Group employed around 13,000 staff in Kazakhstan and around 1,000 in Kyrgyzstan and there were approximately 430 separate contracting firms who worked at the Group's mining sites, providing a variety of specialised services, with over 19,000 contractor-employed workers present on Group sites, comprised of both local and overseas workers. Further details of the KAZ Minerals business model can be found on the Group's website.

The Group's supply chain includes contractors and suppliers providing skilled and unskilled labour, energy, transport, smelting and other services and providing consumables and raw materials required for the mining, processing and sale of copper and its by-products. A key supplier to the Group is the Balkhash smelter in Kazakhstan where 68.7 kt of copper cathode, 43 koz of gold bar and 1,708 koz of silver bar were toll processed in 2024.

### **National context**

The latest Global Slavery Index, which was published by the Walk Free Foundation, ranks Kazakhstan and Kyrgyzstan at 9<sup>th</sup> and 14<sup>th</sup> respectively within the Europe and Central Asia region, with an estimated 1.1% and 0.9% of the population living in modern slavery in Kazakhstan and Kyrgyzstan respectively. Ranked by the estimated prevalence of slavery at national level, Kazakhstan was 17 and Kyrgyzstan 28 out of 167 globally (with a ranking of 1 representing the highest estimated prevalence and 167 the lowest estimated prevalence of modern slavery). In Kazakhstan the main sectors of concern, in particular in relation to living and working conditions for migrant workers, are the construction, cotton and tobacco industries.<sup>1</sup>

### **Our policies in relation to modern slavery and human trafficking**

The Group has established policies and procedures aimed at identifying, preventing and mitigating the risk of modern slavery and human trafficking and it encourages employees and contractors to report any suspected or actual breaches of the principles set out in the Group's policies, either to KAZ Minerals management or by using the confidential reporting 'Speak Up' facility which has local telephone numbers in all our countries of operation.

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<sup>1</sup> Global Slavery Index, Walk Free Foundation

The Group's Code of Fair Employment sets out the standards it expects to be upheld in relation to its own employees and the employees of suppliers or contractors to the Group. It prohibits any involvement in human trafficking of any form and includes clauses prohibiting any forced, involuntary, bonded, indentured or child labour, the retention of passports or identification documents, the taking of deposits, restrictions on freedom of movement and the charging of recruitment fees to workers. All employees of contractor companies must be provided with contracts of employment setting out their rights and responsibilities, be paid above the legal minimum wage, be treated equally with working hours that comply with legal limits and have access to grievance procedures. Harsh or inhumane treatment is strictly prohibited, and workers must be free to terminate their contract of employment at any time and leave the workplace.

The Suppliers' Charter sets out the Group's expectations from its suppliers in relation to human rights, employee wellbeing, anti-bribery and corruption, community relations and environmental responsibilities.

The objectives of the Group's Human Rights Policy are to ensure respect for human rights for all, in every aspect of the Group's operations, in the communities in which it operates. We have adopted the UN Guiding Principles on Business and Human Rights.

Our policies reflect our commitment to act with integrity in all our business relationships to ensure the absence of slavery and human trafficking in our supply chains.

The below Group policies are available on the Group's website.

1. Code of Fair Employment
2. Suppliers' Charter
3. Human Rights Policy
4. Speak Up Policy

#### **Due diligence processes in relation to modern slavery and human trafficking in our business and supply chains**

The Group conducts due diligence checks on all suppliers and contractors to obtain information on the compliance systems and processes they have in place and to ensure that the Group works with business partners who meet its standards. The due diligence process requires suppliers to explain their compliance programme or code of conduct, and to confirm whether they have anti-bribery and corruption policies in place and whether they are aware of any modern slavery within their organisation and to provide details. All suppliers are required to comply with the Group's policies upon entering into a contract with the Group and to commit to upholding the standards set out in the Suppliers' Charter and the Code of Fair Employment. Any negative outcome from due diligence undertaken, any breaches of the Suppliers' Charter or Code of Fair Employment, or a refusal to confirm compliance with the policies, could result in the termination of the Group's contract with that supplier and/or the exclusion of the contractor from working with the Group in the future.

#### **Risk assessment**

During 2024 a risk assessment of the Group's major suppliers was conducted to identify those with a higher potential risk of modern slavery, using information from a range of sources, including the Global Slavery Index and suppliers' labour policies and supply chain management. Suppliers identified as a possible modern slavery risk are subject to further enquiries regarding their policies and processes. Following the risk assessment, none of the Group's major suppliers were deemed to require additional due diligence.

#### **Measuring effectiveness**

Staff are expected to monitor suppliers and contractors to prevent instances of slavery and human trafficking in the Group's supply chain and to report any suspected breaches of the Group's policies through the appropriate channels.

Regular assessments of internal working practices amongst the Group's own employees are carried out to manage the risk of slavery and human trafficking occurring within its own operations. The assessments confirm that conditions of modern slavery are not present amongst the Group's own employees.

The Group has an independently managed 'Speak Up' facility, which provides a confidential and secure means for our employees, contractors, suppliers, business partners and other external stakeholders to report concerns. The facility allows complaints to be submitted anonymously. The Group does not tolerate any form of retaliation against employees who raise concerns in good faith. Any complaints are thoroughly investigated, and the findings are reported to the Audit Committee or Health, Safety and Sustainability Committee of the Supervisory Board which meet regularly during the year.

During 2024, senior managers at each of the Group's sites, confirmed that they had assessed and monitored working conditions, in particular amongst contractor staff, and had detected no indicators of modern slavery on KAZ Minerals' sites. Senior managers also conducted short interviews with selected contractors' staff on site regarding their working conditions and recorded the responses in writing which were then signed by the interviewees.

#### **Training for staff on modern slavery and human trafficking**

The Group has a training programme addressed specifically at individuals from procurement teams, human resources and managers whose roles involve the supervision of contractors, particularly on site, to ensure they understand the risks of modern slavery and human trafficking and to raise awareness of the related standards contained within the Code of Fair Employment and Suppliers' Charter. During 2024 training continued both as part of the induction programme for new employees in relevant roles and by way of refresher training.

Additional training is given to new senior managers on the Group's construction projects where there are higher numbers of contractor construction workers, to ensure vigilance on those sites. Training is cascaded by managers to their teams.

#### **Next steps**

KAZ Minerals is committed to continuous improvement of controls throughout the organisation. In 2025 the Group will continue to raise awareness and to assess and monitor the effectiveness of the actions it has taken to ensure that slavery and human trafficking are not present within the Group, or its supply chain and we will incorporate additional measures where appropriate.

#### **Further information**

For further information on the Group's approach to human rights and employee relations, please see the Environmental, Social and Governance section of the Group website ([LINK](#)).

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the modern slavery statement for KAZ Minerals Limited, and its relevant subsidiaries as listed below for the financial year ended 31 December 2024. It was approved by the Board of Directors of KAZ Minerals Limited on 30 June 2025.



**Andrew Southam**  
**Director**  
**KAZ Minerals Limited**

30 June 2025

Relevant subsidiaries:  
KAZ Minerals Finance Limited  
KAZ Minerals Sales Limited  
KAZ Minerals Investments Limited