

Information Security Policy of KGHM Cuprum sp. z o.o. - CBR

KGHM Cuprum sp. z o.o. - CBR applies and continuously improves the Information Security Management System (ISMS) under a certified Integrated Management System - according to the requirements of ISO 9001:2015, ISO 14001:2015 and ISO/IEC 17025:2017 and the Information Security Policy.

KGHM Polska Miedź S.A.

We effectively safeguard the confidentiality, integrity and availability of the information we process in order to maintain the continuity of the organization in crisis situations, taking into account the context, requirements and expectations of our stakeholders.

We implement the information security policy through:

1. Compliance of our activities with legal and regulatory requirements for the protection of:
 - personal data,
 - state secret and company secret,
 - confidential information - according to the Disclosure Policy of the Capital Group KGHM Polska Miedź S.A.,
 - financial and tax information,
 - other information that provides us with a competitive advantage.
2. Application of area policies, procedures, instructions and related rules: necessary privileges, necessary knowledge, accountability and individual responsibility for information assets.
3. Using effective and efficient safeguards to protect our and entrusted information assets and related resources.
4. Proactive management of external and internal factors, associated risks in the area of threats and opportunities that have or may have a significant impact on the performance of the ISMS.
5. Ensuring by the Management Board the availability of resources needed for effective protection of key information and maintaining and improving the effectiveness of the ISMS.
6. Maintaining a high level of competence of persons having an impact on information security, constantly improving the skills and qualifications of employees and awareness of other stakeholders in this area.
7. Effective internal and external communication related to information security.
8. Ensure control of access to IT systems, applications and infrastructure through procedures of secure login, password and user rights management.

We supervise the implemented Information Security Policy by:

1. Implementing new, multi-layered security measures - ensuring a high level of information, hardware and software security.
2. The activities of the Data Protection Officer.
3. Commissioning of the Central Information Processing Centre - KGHM Polska Miedź S.A. Branch to provide IT services and supervision of the ICT network and the function of IT Systems Administrator.
4. Effective management of incidents and breaches of information security in order to prevent their recurrence or minimise the risk of adverse effects.
5. Periodic reviews of the Information Security Management System within the framework of the IMS review and ad-hoc reviews - in order to supervise constant usefulness, adequacy and effectiveness of our actions.

The Information Security Policy is publicly available on the website <https://kgmncuprum.com/>, as well as known and used by employees of KGHM CUPRUM sp. z o.o. - CBR, suppliers and other stakeholders cooperating with us. I declare to supervise and support the implementation of the Information Security Policy and related objectives consistent with the strategic direction of development of our organization.

Wrocław, on 14.02.2020

Lech Szysznowicz
Wiceprezes Zarządu
p.o. Prezesa Zarządu