

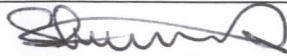


KONKOLA COPPER
MINES plc

KONKOLA COPPER MINES PLC
COMPANY POLICY
WHISTLE BLOWING

Procedure No:	KCM-P-02	Revision No: 4.0
Page 1 of 5		Effective Date, Revision 3.0: 29th May 2013
Originator:	Vice President – HCM	Effective Date, Revision 4.0: 16/02/2018
Revised by:	Manager Compliance	

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Approved By: Chief Executive Officer	Signature: 
	Effective Date, Revision 4.0: 16/02/2018

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1.0 Introduction

The following policy has been adopted by Konkola Copper Mine Plc (the "company") to govern the receipt, retention, and treatment of Complaints and to protect the confidential, anonymous reporting of the same. This policy shall apply to and will be available to all employees of the Company, and all external stakeholders.

2.0 Scope

The policy covers all employees of KCM Plc and external stakeholders.

3.0 Definitions

Term	Definition
-	-

4.0 Responsibilities

The CEO shall ensure that the policy is implemented.

5.0 Policy

Employees have the opportunity to submit / report 'Complaints' pertaining to the following areas such as:

- a) Providing information to Management which leads to the prevention of theft and recovery of stolen assets.
- b) Violations of any rules and regulations applicable to the Company and related to Accounting, Internal accounting controls and auditing matters.
- c) Intentional error or fraud in the preparation, review or audit of any financial statement of the Company.
- d) Any violations to the Company's ethical business practices as specified in the Company's Code of Conduct policy.
- e) Any other event which would affect the interests of the business.

The Company will protect the confidentiality and anonymity of the complainant to the fullest extent possible with an objective to conduct an adequate review. External stakeholders such as vendors, customers, business partners etc. have the opportunity to submit 'Complaints'; however, the Company is not obligated to keep 'Complaints' from non employees confidential but will maintain the anonymity of non employees. However, we encourage individuals sending 'Complaints' / raising any matter to identify themselves instead of sending anonymous 'Complaints' as it will assist in an effective complaint

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review process.

Post review, if the 'Complaint' is found to have been made with *mala fide* intention, stringent action will be taken against the complainant. We encourage employees to report genuine 'Complaints' and those submitted in good faith.

5.1 Receipts and treatment of Complaints

- (a) The CEO is the primary owner for receipt of all Whistle-Blower incidents.
- (b) Complaints received will be dealt with by the CEO, his nominee or any wing as designated by the CEO.
- (c) The person/persons against or in relation to whom the 'Complaint' is made shall cooperate with the Investigator and have the right to provide their inputs during the investigation.
- (d) A KCM Whistle-Blower e-mail ID and postal address have been created as below, where all reports are to be sent

Email: Whistleblower.CEO@kcm.co.zm

Postal Address: The Chief Executive Officer
KCM Whistle Blower
Konkola Copper Mines Plc
P.O Box 11271
CHINGOLA

Or

Call KCM toll free hotline number +1 704-526-1125

- (e) Where relevant, the CEO may nominate an internal or external official to investigate the Whistle-Blower incident. In addition the CEO may nominate a permanent Committee to review or investigate any reported incidences. This, however, does not preclude the CEO from appointing any person from outside the Permanent Committee.

Where such a Committee is constituted it shall meet on a regular basis to:

- To review reported complaints
- Discuss substance of reported complaints for further action.
- Institute investigations in reported cases and receive status reports on on-going investigations.
- Review any conclusions reached by the appointed investigator to decide on the recommendations of the investigation.

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5.2 Access to Reports and Records and Disclosure of Investigation Results

All reports and records associated with 'Complaints' are considered confidential information and access shall be restricted to the CEO and any constituted Committee. 'Complaints' and any resulting investigations, reports or resulting actions will generally not be disclosed to the public except as required by any legal requirements or regulations or by any corporate policy in place at that time.

5.3 Retention of Records

All documents relating to such 'Complaint's made through the procedures outlined above shall be retained for at least five years from the date of the 'Complaint', after which the Information may be destroyed unless the information may be relevant to any pending or potential litigation, inquiry, or investigation, in which case the information shall be retained for the duration of that litigation, inquiry, or investigation and therefore as necessary.

5.4 Amendment to the policy

The Company reserves its right to amend or modify this policy in whole or in part, at any time without assigning any reason whatsoever and the same will be posted on the Company Website.

6.0 Supporting Information

Reference	Description
-	-

7.0 Review

This policy shall be revised as and when the need arises.

8.0 Related documents

Reference No.	Document Name
KCM-P-07	Acceptance of Gifts and Hospitality
KCM-P-24	Code of Ethics for Employees and Code of Conduct for Contractors

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9.0 Amendment Register

Document No.	Page Amended	Revision No.	Amendment Date
KCM-P-02	Replaced Manager Security with Chief Executive Officer in clause 3.0 & 4.1. Amended section 4.0	1	11.07.2011
	Revised section 4.1 d & the policy has been transferred onto a new template	2	04.09.2012
	Removed the statement a reward will be paid at the discretion of management under clause 5.0 Amended section 5.1(e)	3	23.05.13
	Included the toll free hot line number	4	19.12.17

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