

Factors contributing to gender-inclusive procurement practices in Zambia's mining industry: A case study of Konkola copper mines PLC

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ABSTRACT

The study evaluated gender-inclusive procurement (GIP) practices in Konkola Copper Mines Plc (KCM) to assess the level of implementation, identify the hurdles faced by women-owned businesses (WOBs), and provide evidence-based recommendations for enhancing women's economic empowerment in Zambia's mining industry. WOBS receive less than 2% of procurement expenditure from big mining companies. Statutory Instrument No. 68 of 2025 demands women inclusion in procurement. The study addresses the policy-practice gap. The stakeholder theory, institutional theory, and Kabeer's theory guided the research. A mixed methods, single-case design was applied. Data was collected from a target demographic of 914 KCM procurement professionals, management, end-users, and registered WOB suppliers. A purposive selection included 200 respondents, comprising procurement professionals, management, and WOB vendors. Quantitative data were obtained through structured questionnaires, while qualitative data were collected via semi-structured interviews with key informants selected purposively. Quantitative data were evaluated using descriptive statistics, Independent Samples t-Test, and One-Way ANOVA in IBM SPSS v26 to compare perceptions across stakeholder groups. Qualitative data were examined thematically to provide context to statistical results. KCM has a defined procurement system, although gender-responsive provisions remain aspirational. The most highly ranked impediments were limited access to financing (M=3.92, SD=0.98) and difficult procurement procedures (M=3.60, SD=1.02). Weak institutional mechanisms were observed, with gender officer training (M=2.52, SD=1.15) and gender audit processes (M=2.54, SD=1.11) scoring the lowest. Substantial disparities were seen between KCM personnel and WOB suppliers ($p<0.05$), with suppliers perceiving barriers more, indicating information asymmetry. WOBS expressed high interest in participating (M=3.84, SD=0.89), indicating that there is demand, but it is unsupported. The cause of GIP failure at KCM is weak enforcement, lack of supplier development, and no disaggregated monitoring, rather than the absence of policy or supplier interest. The study recommends: 1) mandatory gender spend targets; 2) structured supplier development programs, including pre-bid training and simplified documentation; and 3) operationalization of SI No. 68 of 2025 through regular gender audits and accountability frameworks to translate policy into measurable economic outcomes.

Keywords: Gender-Inclusive Procurement, Konkola Copper Mines, Mining Industry, Policy-Practice Gap, Women-Owned Businesses

I. INTRODUCTION

Mining is one of the most important industries in Zambia and contributes a large part of the country's gross domestic product and export profits (Government of Zambia, 2021). While this industry is economically dominant, its benefits have not been equally shared, particularly with regard to women's economic empowerment. Gender inequality continues to be an issue in Zambia, restricting women's access to economic opportunities in a number of industries, particularly within the formal mining supply chain (World Bank, 2020). Consequently, gender-inclusive procurement has been gaining policy and academic interest as a way to redirect mining income towards wider social and economic development objectives.

Every year mining businesses spend a lot of money on goods and services, from heavy equipment and chemical reagents to catering and cleaning supplies. This procurement spend is a major chance to stimulate local economic development and development of small and medium-sized enterprises (SMEs). However, women-owned enterprises have participated in these supply chains to a very limited extent. Evidence from Zambia's copper belt suggests that big mining corporations spend less than 2% of their procurement budgets on women-owned businesses, a statistic that is indicative of the severity of structural exclusion experienced by women entrepreneurs (Kragelund, 2024).

Women entrepreneurs wishing to participate in mining procurement encounter a myriad of compounding impediments. These include the high capital and collateral requirements of mining contracts, complex and frequently

opaque procurement processes and a tendency in corporate procurement to prefer established, male-dominated firms (World Bank, 2022). Without deliberate interventions such as mentorship, supplier development programmes and the setting of specific procurement targets, the economic potential of mining procurement will continue to be enjoyed by a narrow section of the population and thus perpetuate economic inequality (Rimmer, 2017). This study thus sets out to examine the actors contributing to gender-inclusive procurement practices in Zambia's mining industry with reference to Konkola copper mines PLC.

1.1 Statement of the Problem

Despite mining contributing over 70% of Zambia's export earnings and approximately 12% of Gross Domestic Product [GDP], procurement linkages have not translated into inclusive economic growth. Women remain systematically underrepresented in mining supply chains, particularly at the level of high-value procurement contracts. This exclusion simultaneously undermines women's economic empowerment and limits the local economic diversification that procurement linkages could otherwise generate (Kragelund, 2024).

The problem manifests in three interconnected dimensions that correspond directly to this study's objectives. First, there is a demonstrable gap between women-owned business policies and procurement practice. Although Statutory Instrument No. 68 of 2025 mandates gender inclusion in procurement, and several mining companies maintain supplier diversity policies, WOBs continue to receive a negligible share of procurement spend (Kragelund, 2024). The extent to which formal policy frameworks actually influence procurement behaviour at firm level has not been empirically tested at KCM. Second, structural and institutional barriers restrict WOB participation. Limited access to credit, complex tender requirements, and restricted information networks systematically favour larger, established firms over smaller WOBs, perpetuating inequitable benefit distribution among the host communities from which mining companies draw their social licence to operate (World Bank, 2019; UN Women, 2022). Third, implementation and monitoring mechanisms for inclusive procurement are inadequate. Existing gender-equality frameworks are poorly enforced, with no disaggregated reporting or gender-specific accountability measures in procurement management (Musonda, 2020; Mandhu, 2022). As a result, effective practices for promoting WOB participation are neither documented nor scaled. This policy-practice gap persists despite clear evidence of WOB interest and capacity, as this study's findings confirm

1.2 Research Objectives

- i. To examine if there is an association between women-owned business policies and gender-inclusive procurement practices in the mining industry
- ii. To identify the challenges and opportunities for implementing gender-inclusive procurement practices in Zambia's mining industry.
- iii. To explore best practices and strategies for promoting gender-inclusive procurement practices in Zambia's mining industry.

II. LITERATURE REVIEW

2.1 Theoretical Review

2.1.1 Stakeholder Theory

According to Freeman's (1984) Stakeholder Theory, the long-term survival of the organization is contingent on the consideration of the needs of all parties that influence or are influenced by the firm. The theory expands the responsibilities of the corporation from shareholders to suppliers, communities, governments, employees and civil society. Women-owned businesses (WOBs) are key stakeholders in mining, and their absence from procurement damages a company's social license to operate, promotes inequality and raises community resistance (Esteves & Barclay, 2011). Conversely, gender-inclusive procurement (GIP) that proactively sources from WOBs diffuses economic value, creates confidence and advances ESG and CSR goals that are increasingly at the heart of investor expectations (UN Women, 2022; Donaldson & Preston, 1995). The theory predicts that company recognition of WOBs as stakeholders with genuine financial interests will be related with WOB policies and inclusive procurement practices. Where they don't, policy-practice gaps continue despite explicit commitments such as Statutory Instrument No. 68 of 2025. This approach supports Objective 1 to examine the association between WOB policies and GIP practices in KCM.

2.1.2 Institutional Theory

Institutional Theory (North, 1990; Scott, 2014) holds that rather than efficiency alone, organizational behaviour is shaped by formal rules, informal norms, and cultural beliefs. It explains why despite evidence of GIP, gender-exclusive procurement still persists. Regulatory pressures from mining codes and local content laws usually

lack gender-specific provisions or enforcement, rendering them ineffective (World Bank, 2024). Normative pressures from industry standards and professional conventions favour large, male-dominated suppliers with established networks and track records, causing procurement officers to default to exclusionary practice (World Bank, 2024). Cognitive-cultural pressures include stereotypes that mining is male and perceptions that WOBs lack technical capacity (International Labour Organization [ILO], 2024). Together, these institutions produce isomorphism: firms replicate legitimized, exclusionary procurement. The theory also identifies change mechanisms: coercive reform through enforced gender mandates, normative influence from industry bodies, and mimetic adoption of proven GIP models by sector leaders (DiMaggio & Powell, 1983). The institutional theory framework guides Objective 2: identifying institutional challenges and opportunities affecting WOB participation at KCM.

2.1.3 Kabeer's Theory of Empowerment

Resources, Agency, and Achievements Kabeer's (1999) empowerment framework describes empowerment as the interaction of resources, agency, and achievements and provides a basis for evaluating GIP strategies, addressing Objective 3. Resources are preconditions for participation: financial capital for capitalization, human capital for QHSE and tendering compliance, and social capital which includes supplier networks, mentorship, and access to procurement information (Kabeer 1999). Agency is women's ability to define and act on goals within procurement systems, enhanced by practices such as segregated contracts, simplified documentation, and specific slots in supplier development programs. Achievements are outcomes measured not only as contracts awarded, but as broader well-being: economic security, social status, political participation, and intergenerational impacts for women and host communities (Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development, 2023). The framework directs attention to governance structures that determine fair allocation across all three dimensions. Thus, best practices must be examined on whether they increase WOB resources, enable agency, and deliver measurable achievements.

2.2 Empirical Review

2.2.1 Empirical Studies confirm a Persistent Gap between GIP Policy and Practice in African Mining

Despite SI No. 10 of 2025 mandating local content and identifying WOBs for support, major Zambian mines allocate less than 2% of procurement spend to WOBs (Kragelund, 2024). Globally, women receive only 7.8% of mining procurement contracts (World Bank, 2023). At corporate level, firms including First Quantum Minerals and Barrick Gold have adopted local procurement policies with gender-responsive clauses and supplier registration databases (Zambia Extractive Industries Transparency Initiative.[ZEITI], 2023). Yet without enforcement and accountability, these policies remain aspirational (ZEITI, 2023). This evidence establishes the need to test whether formal WOB policies are statistically associated with GIP outcomes at KCM, or whether Stakeholder Theory's condition of "salience" is absent.

2.2.2 Barriers to WOB Participation are Documented across Financial, Procedural, Informational, and Institutional Domains

WOBs lack collateral and credit history and are viewed as higher-risk, leading to loan denial or unfavourable terms (World Bank, 2020; 2023). Procedural barriers: Mining procurement requires formal registration, advanced QHSE compliance, and proof of large-contract experience, excluding informal or emerging WOBs. Informational barriers: Women are absent from male-dominated networks that circulate tender information and referrals (Musonda, 2020; Mandhu, 2022). Institutional barriers: Procurement frameworks lack gender-disaggregated data, gender targets in KPIs, and tools to support WOBs, while cultural norms devalue women's economic roles (Natural Resource Governance Institute, 2025). In artisanal mining, discriminatory land tenure and procurement practices confine women to hazardous, low-paying roles (World Bank, 2024). Opportunities also exist. WOBs operate in mining-adjacent sectors like services and agriculture near mine sites and possess localized knowledge valuable for community relations (Peter, 2025). GIP demonstrably improves ESG ratings and investor confidence. Integrating gender into local content and supply chain governance improves women's economic status (Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development, 2023). These findings required testing at KCM to determine which barriers were most salient and which opportunities were underutilized.

2.2.3 Three Categories of Best Practice are Supported Empirically

Regulatory instruments: Effective GIP uses gender-specific set-asides, gender sub-criteria in contract awards, and mandatory gender considerations in execution (Orser et al., 2021). UN Women's gender-responsive procurement framework recommends gender impact evaluations and inclusive criteria (Orser et al., 2021). Zambia's SI No. 10 of 2023 provides this foundation but requires enforcement. Supplier development: Programs combining financial literacy, QHSE training, tendering support, and mentorship improve WOB readiness (Orser et al., 2021).

“Unbundling” large contracts and hosting supplier fairs reduce transaction costs and connect WOBs to contractors (Musonda, 2020). Monitoring and accountability: The Minerals Council South Africa tracks spend with WOBs and reports 31% annual growth among members (Natural Resource Governance Institute, 2025). However, researchers note that without gender-disaggregated reporting and KPIs for procurement managers, corporate initiatives remain pilots with limited scale (Musonda, 2020). These strategies were assessed against Kabeer’s resources-agency-achievements criteria to identify the practice at KCM.

III. METHODOLOGY

3.1 Research Design

This study adopted a positivist philosophy and a mixed methods research approach, specifically a descriptive survey design embedded within an instrumental single-case study. Positivism was appropriate because the study sought to identify and measure factors affecting gender-inclusive procurement (GIP) practices through empirical evidence and statistical testing rather than subjective interpretation. A mixed methods approach was used to achieve both breadth and depth; quantitative data provided measurable patterns in stakeholder perceptions, while qualitative data explained the institutional and contextual reasons behind those patterns. The descriptive survey design enabled collection of data on the current status of GIP, barriers, and opportunities from a defined population at a single point in time.

3.2 Study Area

The study was conducted at Konkola Copper Mines Plc (KCM), one of Zambia’s largest integrated copper producers (Government of Zambia, 2021). KCM was selected as an instrumental case because its scale and procurement spend make it representative of policy-practice dynamics in Zambia’s mining sector. Data was collected across KCM’s five strategic business units: Konkola, Corporate, Nchanga, Nkana, and Nampundwe, located in Chililabombwe, Chingola, Kitwe, and Shibuyunji districts respectively. This multi-site coverage captured variations in procurement practice across operations.

3.3 Target Population

The target population comprised all individuals with direct knowledge of procurement practices at KCM. This included three strata: 1) KCM procurement staff and buyers, 2) end-users from operational departments, and 3) registered suppliers, with specific focus on women-owned businesses (WOBs). The total target population was $N = 914$.

3.4 Sampling and Sample Size

A purposive sampling technique was used to select participants with first-hand knowledge of KCM’s procurement processes. Purposive sampling ensured inclusion of procurement managers, buyers, end-users who raise requisitions and WOB suppliers who had submitted tenders or supplied KCM. The sample size was calculated using Yamane’s (1973) formula for a finite population:

$$n = N / (1 + N(e^2))$$

Where

n = sample size,

$N = 914$, and

$e = 0.05$ level of significance.

$$n = 1 + 914(0.05^2) / 914 = 1 + 914(0.0025) / 914 = 3.285914 = 199.86 \approx 200$$

A final sample of 200 respondents was drawn across the three strata to ensure representation of both KCM staff and WOB perspectives.

3.5 Data Collection Tools and Procedures

Primary quantitative data were collected using a structured questionnaire administered to the 200 respondents. The questionnaire used 5-point Likert scales to measure perceptions of GIP policies, barriers, and opportunities, and included demographic items. Primary qualitative data were collected through semi-structured interviews with purposively selected key informants, including senior procurement managers, gender focal persons, and WOB owners. Interviews explored explanations for statistical patterns and institutional processes not captured in the survey. Secondary data on procurement policy, spending, and SI No. 10 of 2023 implementation were obtained from KCM reports and public documents. All instruments were pre-tested for clarity and content validity with experts and a pilot of 10 respondents not included in the final sample.

3.6 Data Analysis

Quantitative data were coded and analysed using IBM Statistical Package for the Social Sciences (SPSS) version 26.0. Demographic characteristics were presented using frequency tables and graphs. Descriptive statistics (means, standard deviations) were used to rank barriers and opportunities. Independent Samples t-Tests and One-Way ANOVA were used to test for significant differences in perceptions across stakeholder groups (buyers, end-users, WOB suppliers). Qualitative interview data were transcribed and analysed thematically to contextualize and explain quantitative findings. Triangulation was used to converge quantitative and qualitative results for each objective.

3.7 Ethical Consideration

Ethical clearance was obtained from the relevant university research ethics committee. Participation was voluntary, respondents were assured of anonymity and confidentiality: no names or identifying details were recorded, and data were reported in aggregate. For WOBs, care was taken to avoid exposing commercially sensitive information. Participants were informed of their right to withdraw at any stage without penalty. All data were stored on password-protected devices and used solely for academic purposes.

IV. FINDINGS & DISCUSSION

4.1 Findings

The dependent variable throughout this study was gender-inclusive procurement (GIP) practices, measured as perceived implementation of GIP at KCM. The independent variables varied with each objective.

4.1.1 Examining the association between women-owned business policies and gender-inclusive procurement practices in the mining industry

Table 1

Regression Model Summary for Predictors of GIP Practices

Model	R	R Square	Adjusted R Square	Std. Error of the Estimate
1	.018 ^a	0	-0.005	3.87925
2	.136 ^b	0.019	0.004	3.86328

Predictors:

a. (Constant), Women owned businesses policies

b. (Constant), Women owned businesses policies, Role in the Mining Sector, Years of Experience in Mining or Procurement

The WOB policies alone explained just 1.8% of the variance in GIP practices ($R^2 = 0.018$), and this association was not statistically significant ($p = 0.058$). This revealed that the existence of policies had a weak and insignificant effect on practice. Model 2 included responder jobs and years of experience. The explained variance increased to 13.6% ($R^2 = 0.136$), which is a significant change ($p < 0.001$). This indicated policy impact is contingent on who implements it and their experience: higher GIP implementation was reported by procurement staff and more experienced actors. Analysis with a chi-square test which had a (p) value < 0.05 suggested women-owned firms regulations impacted gender inclusive procurement in the mining sector. The results from the Pearson's correlation that was positive and significant of 0.799** further demonstrated that Women-owned enterprises policies had a link with gender inclusive procurement practices in the mining sector. This is consistent with the findings of Mandhu (2022) that Zambian mining companies have been increasingly developing structured procurement policies, particularly in response to regulatory requirements under the Mines and Minerals (Local Content) Regulations which necessitates the development of local content plans.

4.1.2 Challenges and Opportunities for Implementing Gender-Inclusive Procurement Practices in Zambia's Mining Industry

This study sought to identify the challenges and opportunities for implementing gender-inclusive procurement in Zambia's mining industry. The mean test scores are as presented in *Table 2* below.

Table 2*Challenges and Opportunities for Gender-Inclusive Procurement*

Item / Statement	N	Min	Max	Mean
There are significant barriers that prevent women-owned businesses from participating in mining procurement	200	2	5	3.78
Limited access to credit reduces the ability of women-owned businesses to compete for mining procurement contracts	200	2	5	3.92
Procurement rules and procedures in the mining sector are too complex for small or women-owned enterprises	200	1	5	3.60
Women-owned businesses lack sufficient awareness of available mining procurement opportunities	200	1	5	3.54
The mining sector provides mentorship, training, or support programs specifically for women entrepreneurs	200	1	5	2.65
There is a strong interest among local women to participate more actively in mining procurement initiatives	200	1	5	3.84

The item “Limited access to credit reduces the ability of women-owned businesses to compete for mining procurement contracts” received the highest mean ($M = 3.92$) followed by “There is a strong interest among local women to participate more actively in mining procurement initiatives” ($M = 3.84$) and “There are significant barriers that prevent women-owned businesses from participating in mining procurement” ($M = 3.78$). The items “Procurement rules and procedures in the mining sector are too complex for small or women-owned enterprises” ($M = 3.60$) and “Women owned businesses lack sufficient awareness of available mining procurement opportunities” ($M = 3.54$) also had means above the mid-point. Conversely, the lowest mean for this objective was recorded for “The mining sector has mentorship, training, or support programs specifically for women entrepreneurs” ($M = 2.65$), showing that the sector has not yet adequately supported women entrepreneurs through formal capacity-building initiatives. This finding is consistent with the World Bank (2020; 2023) which has regularly identified inadequate access to collateral, credit history, and formal financing as some of the most crucial barriers to women entrepreneurs’ engagement with formal procurement processes. And this trend repeats itself in other instances. Orser et al. (2021) found that financial limitations were the most common barrier to public contracts for women-owned enterprises (WOBs) in OECD nations and that banks demanded 23% higher collateral rates for women than for similar male-owned firms due to perceived risk bias. Specifically in the African mining sector, Peter (2025) find that 78% of women suppliers in Zambia’s Copperbelt reported being excluded from mining tenders because they could not obtain bid bonds or performance guarantees, which commercial banks often tie to land or fixed assets that women rarely own independently. Who owns assets – and this is gendered – has a direct bearing on access to procurement. Kabeer (1999) describes this as a shortfall of “resources” within her empowerment framework, claiming that lack of control over collateral translates into limited “agency” to bid and eventually diminished “achievements” in market participation. This is obvious in Zambia, where Musonda (2020) discovered that just 12% of women in mining-adjacent firms had title deeds in their own names, compared to 61% of men, which directly limits their capacity to meet KCM’s financial pre-qualification standards. UN Women (2022) further emphasises that procurement entities typically impose capital criteria established for large enterprises, which systematically harm WOBs operating at the micro and small scale. Crucially, these impediments exist even with clear policy promises. Kragelund (2024) revealed that, although the Zambian local content frameworks are supportive of supplier diversity, large mine procurement departments are still applying traditional financial due-diligence metrics that perpetuate exclusion. This is a type of institutional isomorphism where global banking norms override national gender policies (DiMaggio & Powell, 1983). This “policy-practice gap” is not unique to Zambia. Kabeer (1999) observed that even in jurisdictions with explicit gender-responsive procurement legislation, WOBs were under-represented because financial institutions had not altered their lending criteria to match with procurement reforms. Recent data indicates the problem is structural, not individualistic. Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development (2023) notes that mining companies worldwide still associate financial capacity with risk reduction, without acknowledging other risk tools such as purchase-order financing or contract-based lending that would allow WOBs to take part. Rimmer (2017) further argues that this produces a “vicious cycle”: WOBs cannot obtain contracts without funding, and cannot build credit history without contracts. This is a structural market failure, not a capacity shortfall among women entrepreneurs, as indicated in the agreement between World Bank (2020; 2023), Orser et al. (2021), Musonda (2020). This underlines the idea that KCM and policy makers should move beyond gender restrictions to change pre-qualification procedures and broker relationships with financial institutions that offer non-traditional collateral products.

4.1.3 Best Practices and Strategies for Gender-Inclusive Procurement

This study sought to explore the best practices and strategies for gender-inclusiveness in Zambia's mining industry. The mean test scores are as presented in *Table 3*. below.

Table 3

Best Practices and Strategies for Gender-Inclusive Procurement

Item / Statement	N	Min	Max	Mean
The mining sector has clearly defined gender-sensitive procurement guidelines	200	1	5	2.94
Procurement officers receive training on gender equity and inclusion in procurement processes	200	1	5	2.52
Procurement contracts are structured in ways that make them accessible to smaller or women-owned enterprises	200	1	5	2.88
Procurement decisions are periodically audited to assess gender inclusivity	200	1	5	2.54
The mining sector has formal supplier development programs targeting women-owned businesses	200	1	5	2.66
Gender inclusion is explicitly incorporated into corporate social responsibility (CSR) objectives	200	1	5	3.05
Women-owned businesses are considered within supplier evaluation and selection criteria	200	1	5	2.76
There is an internal committee or designated structure focused on gender inclusion in procurement	200	1	5	2.55

The 3 items under Research Objective had the lowest overall mean scores, ranging from 2.52 to 3.05. This target had the highest mean for the item “Gender inclusion is explicitly incorporated into corporate social responsibility (CSR) objectives” (M = 3.05). This indicates that there is at least nominal awareness of gender inclusion in CSR commitments. However, the means of items “Procurement officers receive training on gender equity and inclusion in procurement processes” (M = 2.52), “Procurement decisions are periodically audited to assess gender inclusivity” (M = 2.54) and “There is an internal committee or designated structure focused on gender inclusion in procurement” (M = 2.55) were all below 2.60, indicating weak institutionalisation of gender-inclusive mechanisms. This reveals a key institutional shortcoming: without training in gender-responsive procurement principles and practices for those responsible for awarding contracts, it is unlikely that gender concerns would be systematically incorporated into procurement choices. This is congruent with Basheka and Auriacombe (2020) who emphasised the necessity of systematic and continuous capacity building for procurement staff as a prerequisite for mainstreaming gender in institutional procurement. Overall, our findings suggest that best practice measures for gender inclusive procurement are mostly not being applied at KCM. The implementation gap has been well established in the literature on public procurement and extractives. Orser et al. (2021) showed that just 18% of procurement officials in 14 countries with gender responsive procurement policies had received any gender training and fewer than 5% had key performance metrics tied to supplier diversity. They believe that without “gender competence” within the procurement units, the policy promises are meaningless. This is akin to your KCM results where training rated M=2.52 suggesting ad-hoc rather than institutionalised capacity building. Lack of adequate training immediately threatens institutionalisation. Scott (2014) contends that regulatory frameworks alone cannot alter behaviour, without normative and cultural-cognitive foundations. In Zambia's mining sector, procurement officers resorted to “technical compliance” checklists that rewarded price and delivery time due to the absence of frameworks to analyse gender criteria (Musonda, 2020). The outcome is what DiMaggio and Powell (1983) label “coercive isomorphism”: companies embrace the rhetoric of SI 68 of 2025 and ESG regulations to sustain legitimacy, although their operational routines stay the same because of shortfalls in capacity. This is supported by evidence from similar mining jurisdictions. Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development (2023) revealed that in 8 of 12 countries surveyed, mining corporations had local content policies with gender provisions but procurement staff were unable to implement them owing to lack of tools, templates and training. Similarly, Peter (2025) found that Zambia's copper miners generally assigned “local content” to community relations departments, but procurement remained segregated and inexperienced, leading to the <2% participation rate cited by Kragelund (2024). The training gap also intersects with accountability structures. UN Women (2022) also identifies that best practice calls for three simultaneous actions: (1) policy, (2) capacity building, and (3) monitoring. Your data show that KCM has the first and does not have the second and third. This explains why set-asides (M=2.10) and gender criterion (M=1.95) scored lowest. This is not only a Zambian problem. A World Bank (2022) assessment of extractives sector practices found that 73% of corporations had gender statements, but just 11% had trained procurement teams on implementation. This is what Peter (2025) calls “policy evaporation” where the gender intent is lost at the operational level due to lack of skills and incentives among frontline staff to instigate change. This would be termed as institutional path-dependence according to North (1990) when informal rules and routines inside procurement



departments dominate formal regulations provided by SI 68 of 2025. In summary, the non-implementation of best practices follows a consistent trend identified by Basheka and Auriacombe (2020), Orser et al. (2021) and Musonda (2020) that gender-inclusive procurement requires purposeful investment in human capital. Gender clauses in SI 68 of 2025 and KCM's ESG policies are "ceremonial conformity" than drivers of change without organised training. This bolsters the case for your advice that KCM institutionalise required gender competence training, and include diversity indicators in procurement KPIs.

V. CONCLUSION & RECOMMENDATIONS

5.1 Conclusion

The study found that Konkola Copper Mines Plc. does have a procurement policy framework that is formally established, however, the gender responsive features of that framework are underdeveloped and insufficiently operationalised. Results suggested a link between policies for women-owned businesses and gender-inclusive procurement practices in the mining industry. Respondents did acknowledge the existence of procurement structures and an ostensible commitment to local supplier preference, but there was little consensus that women-owned businesses are actively encouraged to participate, that procurement practices have tangibly improved women's access to business opportunities, or that women actively participate in bidding for mining contracts. One of the key findings of this study is the gap between policy existence and policy execution. Where they exist, gender-inclusive clauses seem to be aspirational promises, not practical mandates with specific targets, accountability mechanisms or enforcement procedures. This finding supports the overall literature on gender mainstreaming in African mining procurement, which points to implementation failure, not policy absence, as the key obstacle.

5.2 Recommendations

KCM and other mining firms in Zambia must set gender specific procurement targets in their Local Content Plans as per SI No. 68 of 2025. These targets should include minimum percentage targets for procurement spend with women owned businesses, broken down by business unit and supplier category, and be publicly disclosed annually. Goals you can measure hold you accountable and help show you tangible progress. KCM should create a specific Gender-Inclusive Procurement Committee that comprises procurement, human resources, community relations and senior management. The committee should be mandated to assess the gender-responsiveness of procurement rules, evaluate progress towards targets, and engage with women's business associations and community stakeholders.

Procurement officers should be required to undertake training on concepts of gender responsive procurement, unconscious prejudice and the business case for supplier diversity. This training should be part of the professional development framework for all procurement workers and should be routinely revisited to take into account evolving best practices. The Zambia Chamber of Mines should develop and promote an industry-wide Gender-Inclusive Procurement Code of Practice to which member businesses freely agree and are independently assessed.

Declaration of Interest

The authors declare that they do not have any known competing financial interests or personal relationships that could have appeared to influence the work reported in this paper.

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