Public Due Diligence Report for Responsible sourcing

Date: Jan 19th, 2026

Responsible senior manager: Peter Boeckx
Responsible manager: Vanessa Germonpré

Company Information

Aurubis Beerse and Aurubis Berango are recycling and refining companies, valorizing complex non-ferrous secondary scrap and materials and returning metals (including Tin metal) back into the value chain.
Aurubis Beerse (CID 002773), located in Beerse (Belgium), was established in 1919 and Aurubis Berango (CID 002774), located in Berango (Spain), was established in 1991. Both companies work closely together using a unique technology and know-how, accepted as Best Available Technique, to minimize the impact of our activities on people, environment and climate.

Aurubis Beerse produces Copper, Lead and Tin materials and intermediates by smelting and refining mainly complex recycling materials (copper scrap, copper alloyed scrap, copper bearing ashes/residues/slag, tin and lead bearing scraps and residues, …).
Aurubis Berango produces “black copper” from low grade copper bearing materials (ashes, residues, slag, copper/irony scrap, …) in the same way as the “smelting process” of Aurubis Beerse. The black copper produced in Spain can be sold to third parties, but is normally further processed at Aurubis Beerse. Aurubis Berango also consumes lead-tin bearing materials for the production of solder shots, which are processed by Aurubis Beerse.

Aurubis Beerse is a member of the International Tin Association (ITA) and participates in the Responsible Minerals Initiative (RMI) RMAP audit program. Aurubis Beerse and Aurubis Berango hold ISO 9001, ISO 14001, ISO 45001 and ISO 50001 certifications.

Since June 1st, 2020 Aurubis Beerse (formerly Metallo Belgium) and Aurubis Berango (formerly Metallo Spain) are part of the Aurubis Group, a leading worldwide provider of non-ferrous metals, processing primary materials and diverse recycling raw materials. Aurubis is the global leader for copper recycling.

Registered office:
Nieuwe Dreef 33, 2340 Beerse
Belgium

Company registration number
0403.075.580
VAT No. BE 0403 075 580
RPR Antwerpen, division Turnhout

Bank details
IBAN BE86 2300 5280 0150
BIC GEBABEBB

RMAP Assessment Summary

Previous assessment against the Tin and Tantalum Standard (2017) under the Responsible Minerals Assurance Process (RMAP), took place on March 4-5, 2025 and March 11-12, 2025 at Aurubis Beerse and Aurubis Berango respectively, for the audit period 1/1/2024 – 12/31/2024. UL Responsible Sourcing carried out the assessments (lead auditor: Mr. P. Denoize, co-auditor: Ms. R. Kondrateva). The audit reports can be consulted on the website of RMI:
https://www.responsiblemineralsinitiative.org/media/docs/Public%20Reports/Aurubis%20Beerse%20Public%20Report.pdf
https://www.responsiblemineralsinitiative.org/media/docs/Public%20Reports/Aurubis%20Berango%20Public%20Report.pdf
Next RMAP assessment is scheduled on 26-28 January, 2026 in Beerse and 3-4 February, 2026 in Berango for the assessment period 1/1/2025 – 9/30/2025.

Company Responsible Sourcing Policy

Aurubis has developed and implemented a Corporate Responsible Sourcing Policy in order to avoid the use of conflict minerals, which directly or indirectly finance or benefit armed groups or other serious human rights abuses in Conflict Affected and High-Risk Areas. The Corporate Responsible Sourcing Policy is aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-risk Areas. It covers all the risks listed in Annex II of the Guidance.
We are committed to implement corresponding due diligence processes in order to identify, prevent and mitigate said risks in our supply chain. Aurubis Beerse and Aurubis Berango have made the policy publicly available on the website and have communicated the policy to relevant stakeholders: https://www.aurubis.com/dam/jcr:83be7fa4-15fe-49ea-97d8-649b8942aef4/RSP_2024_final_version.pdf

Company Management Systems

Management Structure and Responsibility

The daily management of Aurubis Beerse and Aurubis Berango is in the hands of Managing Director Mr. Hans Van de Water and Mr. Valentin Casado, respectively. Responsibility for the execution and implementation of the tin supply chain due diligence program at Aurubis Beerse and Berango is delegated to Mr. Peter Boeckx (Recycling Business Advisor), supported by Ms. Vanessa Germonpré (Regulatory Affairs Manager), responsible to coordinate the work of the relevant departments (including the Commercial Department, the Logistics Department, the Quality Department and the Sustainable Development Department).

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Once a year, training is conducted for the purchasing department to increase awareness towards Responsible Sourcing in the supply chain. Four training sessions have been organized in August - September 2025 to involve the entire Commercial department. If there is an update of the program, additional training is organized.

Systems of Control and Transparency

Aurubis Beerse and Aurubis Berango have started to implement RMI's revised standard for tin and aligned its due diligence program further with the OECD Guidance as of May 2018, after the training held by RMI in Budapest.
Aurubis' expectations on responsible sourcing and compliance with the OECD Guidance are also communicated to all direct suppliers through the Business Partner Code of Conduct. To fulfill our due diligence obligation with regard to all of our material topics in the supply chain area, Aurubis has implemented a Business Partner and Supply Chain Screening process.

Human rights and environmental risks, as well as violations of human rights or environmental responsibilities, that result from Aurubis' business activities in its own business area or with direct and indirect suppliers, can be reported via our grievance mechanism. Aurubis refers to the Aurubis Compliance Portal to collect information on grievances from interested parties: https://www.aurubis.com/en/Responsibility/whistleblower-hotline.

Record Keeping System

All records relating to the supply chain like contracts and the due diligence program are maintained for at least 7 years and stored in the company databases as stated in the management systems. The supply chain software used by Aurubis Beerse and Berango is called 'GAN'.

Risk Assessment

Referring to the **Responsible Sourcing Policy**, Aurubis Beerse and Berango aim at preventing or mitigating, i.a. all risks identified in Annex II of the OECD Guidance.
The **Business Partner and Supply Chain Screening** is the process implemented to identify, manage, and monitor supply chain risks.. Before contracting and conducting business with a new supplier, the supplier must go through the screening process in the Business Partner Screening (BPS) tool according to ESG, Compliance, and Tax risk considerations.
Aurubis Beerse and Berango are in the process of transitioning the existing Know Your Counterparty (KYC) records to the new Business Partner Screening tool.
As part of the Aurubis Human Rights and Environmental Due Diligence System, Aurubis has an approach to **identify "Conflict Affected and High-Risk Areas" (CAHRAs)** and to identify red flags in the supply chain. Aurubis' CAHRA list is coherent to the TDI CAHRA Index, EU CAHRA list, Dodd Frank Act country list, among others. This list will be applicable to the country of origin and transit routes and information which is indicated upon onboarding of new business partners.

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Supplier location and material combinations assigned a medium or high-risk level require further due diligence as defined in Aurubis Human Rights and Environmental Due Diligence System.

Risk assessment Aurubis Beerse & Berango

The majority of materials sourced comes from secondary sources.

Aurubis also purchases by-products from other smelters, which do not fall under the definition of secondary material and are considered intermediate material. Aurubis purchases these materials only from RMAP conforming smelters. For those supply chains of intermediate material determined to be medium or high-risk, further due diligence has been conducted in accordance with the Aurubis Human Rights and Environmental Due Diligence System,

Aurubis Beerse: in the assessment period 1/1/2025 – 9/30/2025, no primary material has been sourced directly from smelters located in a CAHRA according to Aurubis' CAHRA procedure. No red flags as outlined in Annex II of the OECD Minerals Guidance were substantiated or confirmed.

Aurubis Berango: in the assessment period 1/1/2025 – 9/30/2025, no primary material has been purchased from sources located in a CAHRA. No red flags as outlined in Annex II of the OECD Minerals Guidance were substantiated or confirmed.

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