

Supply Chain Due Diligence Report 2024/25

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Introduction

Company information

Aurubis is a leading global provider of non-ferrous metals and one of the largest copper recyclers worldwide. As an integrated group, Aurubis processes complex metal concentrates, scrap metals, metal-bearing recycling materials, and industrial residues into metals of the highest purity. In addition to our main metal, copper, our metal portfolio also includes gold, silver, lead, nickel, tin and zinc, along with minor metals such as tellurium and selenium, and platinum group metals. The portfolio also includes additional products such as sulfuric acid, iron silicate, and synthetic minerals.

Aurubis purchases the materials required for the primary smelters in Germany (Hamburg) and Bulgaria (Pirdop) on the international market and has a global, diversified supplier portfolio.

A large part of the scrap copper and metal-bearing recycling materials for the Aurubis secondary smelters in Germany (Hamburg and Lünen), Belgium (Olen and Beerse), and Spain (Berango) are procured in Germany, other EU countries, and the US. In addition, Aurubis purchases goods and services worldwide that serve to maintain and further develop business operations (indirect procurement).

Responsibility in the supply chain

Together with other value chain actors, Aurubis' global business activities contribute to employment and advancement, as well as to prosperity. They also, however, include potential or actual adverse impacts related to human rights or the environment. Possible risks for environmental damage, high-risk working conditions, and social conflicts arise in the mining of primary raw materials or in the subsequent processing stages, for example. Aurubis does not operate its own industrial, mining or commercial enterprises in conflict-affected and high-risk areas (CAHRAs). However, Aurubis is aware that materials or other goods and services that Aurubis acquires during its business activities may, in certain cases, originate from such areas.

We are committed to supporting the protection of human rights and the environment and to ensuring international labor and environmental standards are respected within our area of influence. Our objective is

to avoid any negative impacts on human rights and, where possible, to support change for the better. We consistently respect human rights at our sites and expect this from our business partners as well. We recognize our role in the responsible use of natural resources, and we are committed to minimizing the potential impact of their extraction on both society and the environment. The extraction processes employed by our suppliers and their manufacturing activities may have a significant impact on biodiversity and climate issues and on the preservation of air, water and soil quality.

There are other pertinent environmental issues to consider, including slag and tailings management, energy consumption, and water usage, as well as labor and social standards, such as occupational health and safety.

The Aurubis Group fully complies with the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz, LkSG) and aligns its supply chain due diligence practices with internationally recognized responsible sourcing standards. These include the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, the Copper Mark's Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc, the EU Conflict Minerals Regulation (EU 2017/821), the LBMA Responsible Gold and Silver Guidance, and the Responsible Minerals Assurance Process (RMAP) for Tin and Tantalum. By adhering to these frameworks, Aurubis systematically addresses human rights and environmental risks in its operations and supply chain.

In our activities and business relationships, we do not want to be involved in, cause or be complicit in human rights violations, either directly or indirectly.

Aurubis will therefore neither tolerate nor profit from, contribute to, assist in, or be associated with serious abuses related to the extraction, transport or trade of materials or the supply of goods and services. When sourcing from conflict-affected and high-risk areas, Aurubis will neither tolerate nor in any way profit from, contribute to, assist in, or facilitate the commission of torture and cruel, inhuman and degrading treatment by any party.

Aurubis does not tolerate any form of forced or compulsory labor in its supply chains, defined as all work or service performed involuntarily under threat of penalty or without the worker's informed and voluntary consent.

Aurubis does not tolerate child labor and the worst forms of child labor of any kind. The minimum age of an employee shall not be less than 15 years or, where permitted by applicable local law in accordance with Article 2 (4) and Articles 4 to 8 of Convention No. 138 of the International Labour Organization of 26 June 1973 concerning Minimum Age for Admission to Employment, not less than 14 years.

We are committed to respecting internationally recognized human rights, and in addition to the aspects detailed above, our due diligence focuses on the following human rights issues:

- 1 Prohibition of child labor and the worst forms of child labor
- 2 Prohibition of forced labor and all forms of slavery
- 3 Disregard for occupational safety and work-related health hazards
- 4 Disregard for freedom of association — the right to organize and the right to collective bargaining
- 5 Prohibition of unequal treatment in employment
- 6 Prohibition of deprivation of decent wages
- 7 Destruction of natural livelihoods through environmental pollution
- 8 Unlawful violation of land rights
- 9 Prohibition on contracting or use of private/public security forces that may lead to violations due to lack of training or control
- 10 Prohibition of the manufacture, use and/or disposal of mercury (Minamata Convention)
- 11 Prohibition of production and/or use of chemicals covered by the Stockholm Convention (POPs) in addition to the non-environmentally sound handling of waste containing POPs
- 12 Prohibited import/export of hazardous waste as defined in the Basel Convention

Aurubis has also developed sustainability targets that focus on people, the environment, and the economy. The responsible procurement of materials, goods and services is one action area with an individual target defined until 2030.

Management system

Responsibilities

The Aurubis Executive Board ("Board") has been assigned authority and accountability for the effective oversight of the implementation and continuous improvement of our Supply Chain Due Diligence Management System. To fulfill this task, the Board appointed a Supply Chain Committee consisting of senior representatives from the following divisions: Commercial, Corporate Procurement, Corporate Energy & Climate Affairs, Corporate Sustainability, Compliance, Corporate Environmental Protection, and Corporate OHS. This committee is responsible for overseeing the annual risk analysis for human rights and environmental risks in the supply chain in accordance with the German Supply Chain Due Diligence Act and the requirements of the Copper Mark's JDDS as well as the underlying OECD Due Diligence guidance. It also maintains the necessary documentation regarding meetings, results, decisions and other relevant information. Effective May 2025, the Board appointed a dedicated Human Rights Officer (HRO) who has assumed responsibility for the oversight and management of the Supply Chain Due Diligence Management System. The HRO reports directly to the Executive Board and works closely with the Supply Chain Committee regarding supply chain-related components of human rights risk management.

Responsible Sourcing Policy

The [Group Responsible Sourcing Policy](#) summarizes the Group-wide responsibilities and procurement guidelines and ensures a uniform, risk-oriented process for verifying the identity/integrity of suppliers as well as the supply chain. The policy is publicly available on the Aurubis website.

Business Partner Code of Conduct

Aurubis expects its business partners to comply with the fundamental conventions of the International Labour Organization (the ILO), the United Nations' Universal Declaration of Human Rights, and with applicable national and local laws and regulations. Our Business Partner Code of Conduct applies to all business partners of the Aurubis Group, including those of all of majority-owned subsidiaries (>50 %). We conduct business exclusively with partners who demonstrate full alignment with our environmental, social and governance standards and a clear commitment to advancing our sustainability ambition.

Process

Responsibility for implementing the specific due diligence processes in procurement rests with the purchasing departments, more specifically the Commercial division for our metals procurement. The Compliance and Sustainability divisions are involved in the business partner risk assessment process. This assessment focuses on respect for human rights, governance and environmental aspects, and evaluates the processes and management systems that suppliers use to reduce relevant adverse impacts. Additionally, results from external data sources are assessed to identify potential risks (including sanctions, incidents relevant for human rights or governance, adherence to guidelines, financial stability) linked to the respective suppliers. The Corporate Environmental Protection division and OHS are involved in the risk assessment on an event-driven basis.

Initial due diligence processes are carried out prior to entering new business relationships. Additional due diligence processes are conducted during a business relationship, including at intervals corresponding to individual adverse impacts or whenever Aurubis becomes aware of changes regarding adverse impacts, such as human rights violations or ESG issues.

Training

To further strengthen and reinforce employee awareness of responsible sourcing and human rights due diligence, Aurubis conducts annual Group-wide training sessions on human rights and compliance, specifically tailored for its metals procurement buyers. The most recent sessions, held in August and September 2025, achieved a 100 % participation rate.

Grievance mechanism

Human rights and environmental risks, as well as violations of human rights or environmental responsibilities, that result from Aurubis' business activities with direct and indirect suppliers can be submitted via our digital whistleblowing system. It is available around the clock as a reporting channel for suspected legal violations or other infractions. The reporting interface is available in ten languages, and the system includes an integrated translation function that enables reports to be submitted in additional languages. Furthermore, the system guarantees full anonymity, ensuring that whistleblowers face no negative repercussions for making a report, and the confidentiality of the whistleblower's identity and data protection are guaranteed. We consistently investigate all reports. Any grievances submitted may inform our due diligence processes and are considered a potential source of information that could prove useful in identifying and assessing potential red flags. The facts of the case are discussed with the whistleblower (while maintaining anonymity, if desired) and the whistleblower is kept informed about the progress of the proceedings.

Aurubis maintains control and transparency systems to support due diligence. Supply chain records (e.g., contracts, due diligence data) are retained for at least 7 years.

Risk identification and assessment

The Business Partner Screening (BPS) tool is a risk-based, partly automated, end-to-end supplier and supply chain screening process for identifying and managing adverse impacts to prevent or mitigate human rights and environmental impacts. This process includes identifying the supplier, and if applicable, the indirect supplier (e.g., the source of the material), the supplied material, or the goods and services.

The risk assessment process includes the following elements:

- 1 Collection of relevant data from external sources (e.g., KYC data)
- 2 Adverse media checks
- 3 Risk assessment of the supplier and the respective supply chain via an automated initial risk calculator (also determined as abstract risk analysis)
- 4 Self-assessment questionnaires, where deemed necessary
- 5 Further written correspondence and clarifications with the business partner, where deemed necessary
- 6 ESG dialogues and on-the-ground assessments may be conducted, if deemed necessary based on the findings from the previous risk assessments steps.

Two-stage risk assessment process

Initial abstract risk classifications are based on the country and industry affiliation of the supplier. Country-related indicators influence risk classification through reference to multiple indices, which are also incorporated into various CAHRA methodologies. Whenever Aurubis' risk identification process detects initial red flags — based on adverse media checks, external data sources, or the automated risk calculator — or identifies potential or actual adverse impacts related to a supplier or supply chain, the company follows a defined further investigation process. This step is also defined as concrete risk analysis and is aimed to assess whether and how potential and actual adverse impacts can be prevented, mitigated or addressed.

A concrete risk analysis is an individual assessment of a business partner. If the initial abstract risk assessment determines that a business partner has an initial, abstract risk identified as in scope for further assessment, the BPS process requires a more detailed screening, a concrete risk assessment, of the respective business partner. This detailed screening consists of desktop-based inquiries and a variety of self-assessment questionnaires adapted to the supplier profile, additional adverse media screening, as well as accessing a screening report from an external service provider that covers compliance, financial and ESG aspects.

Aurubis conducts further due diligence if any potential or actual adverse impacts are identified. In practice, this means gathering additional information and assurances from the supplier and independent sources. ESG dialogues may be conducted to gain additional assurance that either substantiates or refutes potential adverse impacts. The priority of conducting on-the-ground assessments is weighed according to a defined procedure and prioritization criteria, which include potential and actual adverse impacts, CAHRA origin, and initial abstract and concrete risk indications along with their relevance for the third-party assessments that Aurubis undergoes.

Updates from the reporting period

In FY 2023/24, Aurubis enhanced its risk assessment process to meet both OECD and LkSG requirements, including deploying new software to automate parts of the risk analysis process. Furthermore, Aurubis improved the BPS process by integrating new media-monitoring solution software that automatically searches for supplier-specific adverse reports (e.g., allegations of human rights abuses or environmental incidents). By August 31, 2024, Aurubis had uploaded all the active raw material suppliers from across its fully consolidated sites into the new system, where they underwent a new abstract risk analysis in accordance with LkSG criteria. Building on this foundation, Aurubis fully integrated the software into its operational environment in the current reporting period. Additional risk indicators were also introduced to ensure comprehensive alignment with both OECD and LkSG requirements.

During the current reporting period, Aurubis additionally engaged in multi-stakeholder dialogues (e.g., with the automotive industry and civil society) to refine its due diligence approach. Notably, Aurubis advanced stakeholder mapping in Peru and, based on desktop research and consultations with international and local stakeholders, identified key human rights and environmental priorities in copper mining in the region. This work provides a strong foundation for future engagement with relevant stakeholders and for developing

measures to anticipate and mitigate risks, ensuring that the perspectives of affected communities and industry peers are integrated into our risk response strategies.

DISCLAIMER: This report only contains information pertaining to the Aurubis supply chain in relation to the procurement and supply of copper, nickel, zinc and lead. The scope of this report is limited to the following operational sites: the primary smelters in Germany (Hamburg) and Bulgaria (Pirdop), the secondary smelters in Germany (Hamburg and Lünen), the United States (Richmond), Belgium (Olen and Beerse), and Spain (Berango) as well as the rod production sites in Germany (Deutsche Giessdraht), Italy (Avellino) and for profiles and bars in Germany (Stolberg). By including additional production sites, Aurubis has expanded its reporting scope to cover ten production sites in the current reporting period.

It is important to note that the data and insights provided herein are specific to these materials and sites, and do not encompass other elements of our supply chain or additional sites. Furthermore, due to the specialized nature of our material processing capabilities, there is an overlap in the supply of materials from both primary and secondary suppliers to our primary, secondary and production sites.

A total of 135 business partners were initially flagged for potential risk indicators at our plants in the scope of the report. However, a concrete due diligence process found that none of these red flags, as defined in Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, were substantiated.

At our recycling facility in Lünen, Germany, initial screenings flagged 21 business partners for potential risks. However, a concrete due diligence process found that none of these potential red flags were substantiated or confirmed. At the recycling facility in Olen, Belgium, initial screenings flagged 46 business partners for potential risks. However, a concrete due diligence process found that none of these potential red flags were substantiated or confirmed. At the recycling facility in Richmond, US, none of the business partners were initially flagged for potential risks. At the Beerse plant in Belgium, initial screenings identified potential risk indicators for 48 business partners. A concrete due diligence process found that none of these red flags were substantiated or confirmed. At the Berango plant in Spain, 2 business partners were initially flagged for risk concerns. A concrete due diligence process found that none of these red flags, as outlined in Annex II of the OECD Minerals Guidance, were confirmed. At the Aurubis Deutsche Giessdraht production site in Germany, 11 business partners were initially flagged for potential risks. A concrete due diligence process found that none of these red flags, as outlined in Annex II of the OECD Minerals Guidance, were confirmed. At the Aurubis production site in Avellino, Italy, 13 business partners were initially flagged for risk concerns. A concrete due diligence process found that none of these red flags were substantiated or confirmed. At the Aurubis production site in Stolberg, Germany, none of the business partners were initially flagged for potential risks. At our primary facility in Pirdop, Bulgaria, 19 business partners were initially flagged for risk concerns. A concrete due diligence process found that none of these red flags, as outlined in Annex II of the OECD Minerals Guidance, were confirmed. At the primary facility in Hamburg, Germany, initial screenings identified potential risks associated with 46 business partners. However, a concrete due diligence process found that none of these red flags, as defined in Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, were substantiated.

Risk management

If potential or actual adverse impacts on human rights or the environment are identified during the risk assessment, measures are formulated for increasing the level of information on the potential risks, for mitigating specific risks, or for preventing or eliminating the adverse impact or for minimizing its scope. The Corporate Sustainability and Compliance divisions formulate these measures and the purchasing departments communicate them to suppliers. This process is an integral part of our communication with suppliers.

These measures might include remedial actions, such as improving on-site practices, strengthening the supplier's own due diligence, and other steps for eliminating a risk. Aurubis may also carry out stakeholder consultations or conduct on-site audits in cooperation with the supplier to obtain firsthand insight into the situation.

Progress on any agreed improvement plans is then monitored. As a general preventive measure, Aurubis has anchored ESG and human rights clauses in 100 % of its long-term concentrate contracts in the reporting period. Aurubis is committed to progressively extending such binding agreements to additional contract types, such as with commodity traders. During the reporting period, Aurubis engaged in ESG dialogues with suppliers from both primary and secondary supply chains and across various geographical regions. These engagements aimed to strengthen transparency, assess ESG performance, and foster continuous improvement in areas such as human rights, environmental management, occupational health and safety, and business ethics. The dialogues provided an opportunity to review existing practices, address potential risk areas, and support suppliers in aligning with internationally recognized standards and Aurubis' expectations. Where gaps were identified, follow-up actions were initiated to obtain additional information and monitor progress over time. During the reporting period, on-site visits and on-the-ground assessments were conducted at seven of our targeted long-term primary concentrate business partners, as well as four of our secondary business partners, to gain a direct understanding of operational conditions on site.

Independent third-party audit

Aurubis undergoes independent third-party audits and certifications to verify its responsible sourcing practices for copper, nickel, zinc and lead. These audits provide external assurance that Aurubis' due diligence (Steps 1–3) is effective and aligned with OECD guidance. In FY 2024/25, Aurubis participated in several assurance programs, with a focus on the multimetal Copper Mark assurance framework and related standards:

- » The Copper Mark (Joint Due Diligence Standard) — The Copper Mark's Joint Due Diligence Standard explicitly covers copper, lead, nickel and zinc supply chains in line with the OECD's five-step framework. During the reporting period, all of Aurubis' large smelter sites underwent Copper Mark assessments or had a valid compliance status of their responsible sourcing due diligence for these metals. By September 2025, Aurubis Hamburg, Lünen (Germany), Olen, Beerse (Belgium), and Pirdop (Bulgaria) were successfully audited against the Copper Mark's due diligence requirements for copper, lead, nickel and zinc. These Copper Mark audits are typically conducted by independent firms accredited by the Copper Mark and in accordance with OECD-aligned methodologies. The achievement that all of Aurubis' primary smelters are Copper Mark-certified by the end of FY 2024/25 demonstrates strong third-party validation of its due diligence for copper, nickel, zinc and lead.
- » RMI RMAP for Tin — Aurubis' recycling sites in Beerse (Belgium) and Berango (Spain) process tin-bearing secondary materials and have been audited under the Responsible Minerals Initiative's Responsible Minerals Assurance Process (RMAP) for tin. These sites have been RMAP conformant (conflict-free) for tin each year since 2015. In March 2025, Aurubis Beerse/Berango underwent their latest tin RMAP assessment (covering 2024) and remained conformant. This continuous compliance record for tin gives additional evidence of Aurubis' overall responsible sourcing diligence, and in particular complements the Copper Mark's coverage of other base metals.

For Aurubis' customers and stakeholders, the audits provide assurance that >95 % of Aurubis' output (by copper volume) in 2024/25 was produced at sites operating under independently verified responsible sourcing standards. Going forward, Aurubis will continue to participate in such audits regularly (e.g., Copper Mark reassessments every 3 years, annual tin audits) to maintain its certifications and to identify any areas for improvement.

Annual supply chain due diligence reporting

Aurubis is committed to providing at least annual reporting on its responsible sourcing due diligence in a manner that fosters public trust in the company's approach to managing identified supply chain risks.