



Corporate Responsible Sourcing Policy

Version: 2

Owner: Commercial & Corporate Procurement

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1. Definitions

For the purpose of this Corporate Responsible Sourcing Policy, the following definitions apply:

Material: Indicates all mined (“Primary Materials”), and/or recycling material (“Recycling Materials”) received, held, and/or processed and intended for the production of metal products.

- a) **Primary Material** (Minerals & Mined Materials): Metal-bearing ore or primary processed material which has never been previously refined. Minerals partially processed, unprocessed, or resulting from the processing of another metal ore. Examples: concentrates and if not resulting from 100 % recycled material: cathodes, blister, anodes, residues, slimes, slags, skimmings.
- b) **Recycling Material:** Reclaimed end user or post-consumer products, or scrap processed metals created during product manufacturing. Recycled metal includes excess, obsolete, defective, and scrap metal materials which contain refined or processed metals that are appropriate to recycle in the production of, e.g., copper, lead, nickel, gold, silver, tin, and zinc. Examples: copper scrap, copper alloy scrap, granules.

Goods and Services: Goods and Services which are necessary to maintain and develop Aurubis operations and which are bought for investments and for consumption by internal stakeholders.

2. Purpose and Scope

Aurubis AG 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 raw materials, and industrial residues into metals of the highest purity. In addition to our main metal, copper, our metal portfolio includes gold, silver, lead, nickel, tin, zinc, 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 buys the necessary Materials for the primary smelters located in Germany (Hamburg) and Bulgaria (Pirdop) on the international market. Aurubis has a global, diversified supplier portfolio.

Aurubis sources a significant portion of its copper concentrates from South American countries such as Peru, Chile, and Brazil.

Most of the copper scrap and metal-bearing recycling Materials for Aurubis’ secondary smelters which are in Germany (Hamburg and Lünen), Belgium (Olen and Beerse), and Spain (Berango) are sourced in Germany and other EU countries while copper scrap and metal-bearing recycling Materials, used in Aurubis’ secondary smelter in the US (Richmond), is coming from North America.

Aurubis also sources Goods and Services worldwide which enable it to maintain and develop its operations (indirect procurement).

If Aurubis starts up new sites, the principles set out in this Corporate Responsible Sourcing Policy shall apply.

Aurubis does not maintain own industrial, mining, or trading operations in Conflict-Affected and High-Risk Areas (CAHRAs). However, Aurubis understands the seriousness of the possibility that Materials or other Goods and Services purchased during its activities may in certain cases originate from such areas. Hence, Aurubis understands that it is necessary to exercise due regard for human rights with the aim of preventing or minimizing any risks to human rights or environment- related risks or of ending the violation of human rights-related or environment-related obligations.

Sustainable action and economic activity are central to Aurubis' corporate strategy. Aurubis has developed sustainability targets that center around the aspects of people, environment, and economy. Responsible sourcing of Materials and Goods and Services is one of the action areas.

This Corporate Responsible Sourcing Policy summarizes the Group-wide sourcing rules and ensures a uniform, risk-oriented supplier identity/integrity and supply chain screening process which is based on and aligned with the five-step framework of the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk-Areas, the Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc of The Copper Mark, the EU Conflict Minerals Regulation 2017/821, the LBMA Responsible Gold and Silver Guidance, the Responsible Minerals Assurance Process (RMAP) Tin and Tantalum Standard, and the German Supply Chain Due Diligence Act (LkSG).

The Corporate Responsible Sourcing Policy applies to all group companies in which Aurubis AG directly or indirectly holds the majority of all shares. The implementation of the detailed screening process will follow a risk-based approach.

Aurubis continuously improves this policy and the processes mentioned herein.

3. Responsible Sourcing Principles

Aurubis consistently respects human rights and strives for sustainable behavior at its sites and expects this from its suppliers as well. Aurubis promotes risk awareness towards its suppliers and requests that the suppliers comply with this policy when extracting, sourcing, transporting, trading, handling, or exporting Materials or are delivering Goods and Services.

With this Corporate Responsible Sourcing Policy Aurubis aims at preventing or mitigating all human rights and Environmental, Social and Governance (“ESG”) risks identified or referred to in, among others, the Annex II of the OECD Due Diligence Guidance of Minerals from Conflict- Affected and High-Risk-Areas, the Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc of The Copper Mark, the EU Conflict Minerals Regulation 2017/821, the LBMA Responsible Gold and Silver Guidance, the Responsible Minerals Assurance Process (RMAP) Tin and Tantalum Standard, and the German Supply Chain Due Diligence Law (LkSG).

Aurubis will not tolerate nor profit from, contribute to, assist in, or want to be linked to any of the following violations:

Serious abuses associated with the extraction, transport, trade of Materials or the supply of Goods and Services

While sourcing from conflict-affected and high-risk areas, Aurubis will neither tolerate nor by any means profit from, contribute to, assist with, or facilitate the commission by any party of torture, cruel, inhuman, and degrading treatment.

Aurubis does not tolerate any forms of forced or compulsory labor in its supply chains, which means work or service which is exacted from any person under the menace of penalty, and for which said person has not offered themselves voluntarily.

Child labor and the worst forms of child labor¹ are not tolerated by Aurubis in any kind. The age of the 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 of Employment, not less than 14 years.

Aurubis does not tolerate other human rights violations and abuses such as widespread sexual violence. This of course also accounts to war crimes or other violations of international humanitarian law, crimes against humanity, or genocide.

Occupational safety

Aurubis denounces any avoidable risk of accidents or work-related health hazards. Aurubis denounces obviously insufficient safety standards in the provision and maintenance of the workplace, workstation, and work equipment. There must be sufficient safety standards and appropriate protection to prevent exposure to chemical, physical, or biological substances.

¹ See ILO Convention on the worst forms of child labor

Aurubis also denounces the lack of measures to prevent excessive physical or mental fatigue, in particular through inappropriate work organization in terms of working hours and breaks.

Freedom of association and the right to collective bargaining

Aurubis denounces any form of restriction by its suppliers of the freedom to set up or join trade unions or equivalent representative unions and the right to participate in collective bargaining and strikes within the entire supply chain. The formation, joining, and membership of a trade union should not be used as reason for discrimination, reprisal, or harassment.

Unequal treatment in employment

Aurubis denounces unequal treatment, for example on the grounds of national and ethnic origin, social origin, disability, sexual orientation, age, gender, political opinion, religion, or belief.

Fair wage

Aurubis denounces the withholding of reasonable wages. The salary shall be at least the minimum wage established by applicable law.

Public or private security forces

Aurubis will not tolerate the hiring or use of private or public security forces to protect a supplier's project if, due to lack of instruction or control on the part of the supplier, the use of the security forces (a) violates the prohibition of torture and cruel, inhuman, or degrading treatment, (b) causes injury to life or limb, or (c) interferes with the freedom of association and labor.

Aurubis will not contribute to direct or indirect support to public or private security forces who especially illegally control mine sites, transportation routes, and upstream actors in the supply chain; illegally tax or extort money or Primary Materials at point of access to mine sites, along transportation routes, or at points where Primary Materials are traded; or illegally tax or extort intermediaries, export companies, or international traders.

Aurubis recognizes that the role of public or private security forces especially at mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment, and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.

Where a company in Aurubis' supply chain contracts public or private security forces, Aurubis requires that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights. In particular, Aurubis will support the adoption of screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.

Aurubis will, where applicable, support efforts to engage with central or local authorities, international organizations, and civil society organizations to contribute to workable solutions on how transparency, proportionality, and accountability in payments made to public security forces for the provision of security could be improved.

Aurubis will, where applicable, support efforts to engage with local authorities, international organizations, and civil society organizations to avoid or minimize the exposure of vulnerable groups, in particular, artisanal miners where Primary Materials in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites.

[Direct or indirect support to non-state armed groups](#)

Aurubis does not tolerate any direct or indirect support to non-state armed groups especially through the extraction, transport, trade, handling, or export of Materials. “Direct or indirect support” to non-state armed groups through the extraction, transport, trade, handling, or export of Materials includes, but is not limited to, procuring Materials from, making payments to, or otherwise providing logistical assistance or equipment to non-state armed groups or their affiliates who:

illegally control mine sites or otherwise control transportation routes, points where Materials are traded, and upstream actors in the supply chain; and/or

illegally tax or extort money or Materials at points of access to mine sites, along transportation routes, or at points where Materials are traded; and/or illegally tax or extort intermediaries, export companies, or international traders.

[Corruption and Bribery](#)

Aurubis will not offer, promise, give (active bribery), or demand, agree to, or accept (passive bribery) any bribes or facilitation payments.

[Fraudulent misrepresentation of the origin of Materials](#)

Aurubis will resist the solicitation of bribes to conceal or disguise the origin of Materials, to misrepresent taxes, fees, and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport, and export. Suppliers of Primary Materials must act according to relevant initiatives such as the Extractive Industry Transparency Initiative (EITI).

[Payment of taxes, fees, and royalties due to governments](#)

Aurubis will ensure that all taxes, fees, and royalties related to mineral extraction, trade, and export from conflict-affected and high-risk areas that are due by Aurubis are paid to governments and, in accordance with Aurubis position in the supply chain, Aurubis commits to disclose such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI).

[Money laundering, terrorism financing, and contribution to conflict](#)

Aurubis will support efforts, or take steps, to contribute to the effective elimination of money laundering where Aurubis identifies a reasonable risk of money-laundering especially resulting from, or connected to, the extraction, trade, handling, transport, or export of Materials derived from the illegal taxation or extortion of Materials at points of access to mine sites, along transportation routes, or at points where Materials are traded by upstream suppliers.

Aurubis will not tolerate any form of terrorism financing or any other form of contribution to conflicts within the supply chain.

[Unauthorized sourcing from world heritage sites and protected areas](#)

Aurubis will not buy, process, or offer any products in which Materials from world heritage sites or protected areas are included. In addition, Aurubis does not tolerate trade relationships with companies that offer such Materials.

[Harmful environmental influences](#)

Aurubis denounces any harmful ground soil contamination, water pollution, air pollution, harmful noise emission, or excessive water consumption, if it is harmful to a person’s health, denies a person access to safe drinking water, or significantly impairs the natural basis for the preservation and production of food. Further Aurubis requires the supplier to operate responsible water stewardship, especially in water scarce and stressed areas.

Also, suppliers are required to store, handle, and dispose of hazardous chemicals, including mercury and cyanide, in a responsible manner so that neither the environment nor any person is harmed.

[Unlawful eviction and taking of land](#)

The unlawful eviction or the unlawful taking of land, forest, and waters in connection with the acquisition, construction, or other use of land, forest, and water, especially when it secures the livelihood of any person, is seen as intolerable by Aurubis. Also, Aurubis does not accept any unlawful land acquisition which endangers a cultural heritage site and indigenous people or threatens vulnerable populations.

Specific environmental risks

Aurubis does not tolerate violations of the prohibitions on the production of mercury-added products regulated by the Minamata Convention, the prohibition on the use of mercury and mercury compounds in manufacturing processes, the prohibition on the treatment of mercury waste and violations of the prohibition on the production and use of chemicals under Article 3(1)(a) and Annex A of the Stockholm Convention of 23 May 2001 on Persistent Organic Pollutants (POP Convention). In addition, Aurubis does not accept violations of prohibitions on the non- environmentally sound handling, collection, storage, and disposal of waste and prohibitions under Article 6(1)(d)(i) and (ii) of the POP Convention and violations of prohibitions on the export and import of hazardous waste under the Basel Convention.

4. Supplier- and Supply Chain Due Diligence Process

4.1. Responsibilities

Respect for human rights and the environment has the highest priority for Aurubis in its business activities. Therefore, authority and accountability for the effective oversight of the implementation and continuous improvement of the Supply Chain Due Diligence Program is assigned to the Executive Board of Aurubis ("Board"). In order to fulfil this task, the Board appoints a "Human Rights Officer in a formal way, a role held by the - Head of Corporate Sustainability-. Responsibilities of the Human Rights Officer include, but are not limited to, the following tasks:

- Personal monitoring of human rights and environmental risk management within supply chain and own business operations
- Monitoring of risk analysis, preventive and remedial measures taken, complaints procedure, documentation and reporting
- Support in creating/updating the annual policy statement
- Regularly informing the Board about human rights and environmental risk management, at least once a year and as needed
- Involvement of the Board, if necessary
- Support and provide advice for the Board regarding human rights and environmental due diligence obligations.
- Support, coordinate and provide advice for operational risk management regarding human rights and environmental due diligence obligations.
- Responsiveness regarding human rights and environmental due diligence obligations for all stakeholders, especially for supervisory authorities.

The function will as such report directly to the Board.

To manage Supply Chain related risks the Board appoints a committee in a formal way consisting of senior representatives from the following departments: Commercial, Corporate Procurement, Corporate Energy & Climate Affairs, Corporate Sustainability, Compliance, Corporate Environmental Protection and Group H&S ("Supply Chain Committee" or "SCC"). This Supply Chain Committee also ensures an annual risk analysis with regard to human rights and environmental risks in the supply chain and all necessary documentation regarding meetings, results, decisions, and other relevant information.

4.2. Risk Identification and Risk Management Process

The risk identification and risk management process to display, prevent, or mitigate the aforementioned ESG impacts is a risk-based, partly automated, end-to-end supplier and supply chain screening process that includes the identification of a supplier, if applicable of the indirect supplier (e.g. source of the Material), the supplied Material or the Goods and Services. The collection of relevant data from external sources and e.g. questionnaires, supporting documents, the risk-assessment of the supplier and the respective supply chain, the risk management, and the reporting are equally part of the risk management process.

Initial Due Diligence processes are carried out before entering new business relationships. Further due diligence processes are conducted during the business relationship i.a. at intervals corresponding with the individual risk or whenever changes regarding the risk of e.g., human rights violations or ESG offences become known. The Due Diligence Processes are described in the Process Description Business Partner and Supply Chain Screening in more detail.

When Aurubis identifies any of the aforementioned risks, Aurubis will engage with its suppliers, relevant authorities, international organizations, civil society, and affected third parties, as appropriate, to improve and track performance with a view to prevent or mitigate these risks within the supply chain. Aurubis will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation for any of these risks defined above.

5. Continuous Improvement, Third Party Audit, and Reporting

5.1. Continuous Improvement, Third Party Audit

The Supply Chain Committee regularly, and at a minimum annually, assesses the effectiveness of the supply chain due diligence policies and processes to drive continuous improvement.

For specific supply chains for gold-, silver-, tin-, and copper-bearing material – and whenever deemed necessary according to the risk profile – Aurubis looks for third party audits in particular to ensure the appropriate implementation of the Aurubis due diligence practices for responsible supply chains from conflict-affected and high-risk areas. These audits include all activities, processes, and systems used by Aurubis to implement supply chain due diligence. This includes relevant policies and procedures, Aurubis controls over respective supply chains, communications with actors in these supply chains, the information disclosed to downstream companies on suppliers, chain of custody, and other traceability information, Aurubis risk assessments including, if applicable, the onsite research and Aurubis strategies for risk management.

5.2. Policy Revision

Commercial and Corporate Procurement are the owners of this policy and are – in cooperation with the Supply Chain Committee – obligated to review this policy on a regular basis and update it, if necessary, in order to continuously improve supply chain due diligence processes. Changes in the policy are subject to Executive Board approval. Prior to said approval, Commercial and Corporate Procurement are required to include the Aurubis Human Rights Officer (HRO) in the revision cycle to ensure that incorporated changes are in line with expectations to quality, effectiveness and adequacy.

5.3. Public Reporting

Aurubis commits to report at least annually on due diligence for responsible sourcing in a way that the public can gain confidence in the measures Aurubis is taking in response to detected risks. The information will be made available in a manner that is understandable and accessible to stakeholders and the public. Aurubis considers the international reporting principles including accuracy, clarity, comparability, reliability, and timeliness.

This includes a description of our management systems in line with the commitments in this policy, the results of the supply chain risk assessment (within the boundaries of business confidentiality and other competitive concerns and laws), and the steps taken to manage risks and to monitor and track performance.

The reports of due diligence audits of our smelter and refinery sites will be made publicly available.

6. Grievance Mechanism/Whistleblower System

Aurubis maintains a grievance mechanism/whistleblower system which is defined in the current version of the Corporate Compliance Policy and described in the publicly available Rules of Procedure in more detail.

Any interested party may voice concerns regarding the violation of any of the abovementioned responsible sourcing principles in view of the OECD Guidelines for Responsible Supply Chains of Minerals, the Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc of The Copper Mark, the EU Conflict Minerals Regulation 2017/821, the LBMA Responsible Gold and Silver Guidance, the Responsible Minerals Assurance Process (RMAP) Tin and Tantalum Standard, and the German Supply Chain Due Diligence Law (LkSG) to the Aurubis whistleblower system:

<https://www.aurubis.com/en/responsibility/whistleblower-system>

The whistleblower system can be contacted around the clock to report tips regarding possible violations or other actions that could harm the abovementioned responsible sourcing principles. The whistleblower will not suffer any disadvantage because of a report if the allegation was communicated in good faith regarding its validity.