

Aurubis AG Policy Statement on Respecting Human Rights and Environmental Obligations

in accordance with Section 6 (2) of the German Supply Chain Due Diligence Act

Foreword

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 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 copper scrap 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).

Aurubis' global value chain contributes to employment, training, advancement and prosperity. It also, however, includes risks related to respect for human rights. 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.

We have participated in the United Nations Global Compact since 2014 and are committed to working towards implementing its ten principles related to human rights, labor standards, the environment, and anti-corruption. We have pledged to comply with the OECD Due Diligence Guidelines to promote responsible supply chains.

As part of the Copper Mark certification process at our sites in Hamburg, Lünen and Stolberg (Germany), Olen and Beerse

(both in Belgium), and Pirdop (Bulgaria), we underwent audits in accordance with the Copper Mark criteria on human rights, labor and social standards, and environmental standards. This audit verified our human rights approach to our business activities and in the supply chain. Auditing feedback helps us continue to improve our approach. Certification of our Deutsche Giessdraht site in Emmerich (Germany) is planned for late 2025 and for the Avellino (Italy) site in 2026.

Aurubis' gold production has been annually certified pursuant to the London Bullion Market Association (LBMA) standards since 2013. This certificate verifies that we carry out our due diligence in accordance with the OECD guidelines. This certification option has been available for silver since 2019, and Aurubis' silver production has been certified since then as well. Tin production at our Beerse and Berango sites has been certified in accordance with the Responsible Minerals Assurance Process Standard (RMAP) and the Responsible Minerals Initiative (RMI) since 2015. This standard is also based on the OECD guidelines for responsible raw material supply chains.

In implementing its human rights and environmental due diligence, the Aurubis Group is subject to the requirements of the German Supply Chain Due Diligence Act (LkSG). The LkSG requires that a company release a policy statement detailing the company strategy for protecting human rights and fulfilling its environmental obligations. This policy statement must include a description of Aurubis' processes for complying with legal obligations along with a depiction of the specific human rights and environment-related risks and the expectations placed on our employees and suppliers identified by an annual risk analysis.

Our understanding and guiding principles

We assume responsibility toward our employees, our suppliers, and our customers. This is also true for all of the areas surrounding our sites and for the communities in which we are active. Respect for human rights is an important part of this responsibility and is reflected in our entrepreneurial understanding of values. This is why we have committed to supporting the protection of human rights and to complying with international labor standards in our area of influence.

In our activities and business relationships, our objective is to avoid being involved in, causing or being complicit in human rights violations, either directly or indirectly. We do everything we can to avoid any negative impacts on human rights and, where possible, to change them for the better. We consistently respect human rights at our sites and expect this from our business partners as well.

Aurubis follows the United Nations Guiding Principles on Business and Human Rights in accordance with the “Protect, Respect and Remedy” Framework. We understand the responsibility for human rights as a responsibility shared by all of the participants in the value chain. It is the obligation of states to protect human rights, just as it is incumbent upon economic actors to respect human rights in their business activities. In the case of human rights violations, both states and companies must ensure that remedial action is taken.

This policy statement applies to Aurubis AG and all its affiliated, fully consolidated companies.

Hamburg, January 1, 2025 Aurubis AG

Executive Board

1. Human rights and environmental strategy

Human rights and decent working conditions

We respect human rights and advocate for their protection. Here we follow the United Nations' Guiding Principles on Business and Human Rights in accordance with the “Protect, Respect and Remedy” Framework and view human rights due diligence as a responsibility shared by all participants in the respective value chain, including nation states and economic actors.

Respect for human rights is reflected in our company values and included in our [Code of Conduct](#). In our COC, we pledge to reject all forms of discrimination and to handle individual and cultural diversity in our company with sensitivity. We are committed to the principle of co-determination in the company and place a high priority on good communication between our employees and company management. Complying with the internationally recognized International Labour Organization (ILO) core labor standards, labor law provisions, applicable labor standards, and laws with respect to compensation, working hours, and the general rights of our employees is fundamentally important to us. The [Aurubis Business Partner Code of Conduct](#) specifically applies to business partners. We do not tolerate forced labor or child labor in our value chain, and we respect the rights of indigenous populations and local communities.

We call on all employees to report any justified suspicion of discrimination or other human rights violations directly to the discrimination officers at the Aurubis sites or via our Compliance Portal, the [whistleblower system](#). We expect the same from our business partners. Every report is investigated.

Responsibility in the supply chain

We take responsibility for sustainability standards, and not just in our own production processes and actions, but in our supply chain as well. This is all the more important because we source raw materials from around the world for our business. The countries of origin include regions that could pose risks regarding compliance with sustainability standards.

We use natural resources whose extraction can have a direct or indirect impact on social and environmental aspects. The extraction processes used by our suppliers and their production activities can, for example, have an effect on biodiversity and the climate, and on maintaining air, water and soil quality. Other environmental issues are also relevant, such as slag handling and energy and water use.

Social aspects, such as compliance with human rights and labor and social standards, and health and occupational safety at our suppliers, are also taken into consideration.

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 in the course of its business activities may, in certain cases, originate from such areas.

Sustainable conduct and economic activities are central to Aurubis' **company strategy**. Aurubis has 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 individual targets defined until 2030.

The Corporate Responsible Sourcing Policy summarizes the Group-wide procurement guidelines and ensures a uniform, risk-oriented process for verifying the identity/integrity of suppliers and the supply chain. It is based on:

- » Regulation (EU) 2017/821, which establishes supply chain due diligence obligations,
- » the German Supply Chain Due Diligence Act (LkSG),
- » the five steps from the OECD Guidance for Responsible Supply Chains,
- » [the Copper Mark's](#) Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc,
- » the LBMA Responsible Gold and Silver Guidance,
- » the Responsible Minerals Assurance Process Standards (RMAP) for tin and tantalum

Aurubis respects human rights, works on steadily improving its sites' sustainability performance, and expects the same from its suppliers. Aurubis promotes risk awareness among its suppliers and expects them to likewise comply with the corporate policy's principles when mining, procuring, transporting, trading, handling or exporting materials or delivering goods and services.

Comprehensive environmental protection

Our goal is to produce in a way that minimizes the environmental impact of our business activities, enabling product manufacture that is as environmentally sound and as safe as possible. **We strive to continue shrinking our environmental footprint.** This footprint includes maintaining air, water, and soil quality and biodiversity in our plants and the surrounding areas, as well as handling waste, hazardous substances, and water use responsibly. These environmental protection aspects are observed and managed with a holistic perspective in our environmental management system and have been confirmed within the scope of the ISO 14001 and Copper Mark certification. The upstream risks of our business activities on the environment are analyzed in our Business Partner Screening.

2. Relevant human rights issues and groups of individuals potentially affected

We are aware that our business activities and global value chains could have negative effects on human rights aspects.

We are committed to respecting all internationally recognized human rights, and our duty of care focuses on the following human rights issues:

1. Prohibition of child labor, particularly 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

In our efforts to respect human rights, we focus on the following rights-holders who are potentially endangered by the business activities in our own business area as well as in global supply and value chains:

- » Our employees at national and international sites, including apprentices
- » Business partner employees
- » Groups of individuals in our direct and indirect supply chains:
 - » Employees in raw materials mining and processing as well as in the manufacture of intermediate products
 - » Staff of service providers and direct suppliers of goods
- » Groups of individuals with an indirect link to the supply chain: members of local communities and people who live close to the sites, family members

Among these rights-holders, we have identified individuals who could be at an increased risk of negative human rights impacts within our value chain. Our risk management

processes focus on these potentially affected individuals in particular. These are groups of individuals either with special needs, who are excluded by society, or who have difficulty making their voices heard. In these groups of individuals deserving special protection, we include:

- » Women
- » Young people
- » Local communities¹
- » Persons with disabilities

3. Responsibilities

The Executive Board and the local managing directors bear responsibility for upholding human rights in our business activities. The Code of Conduct requires that all Aurubis employees fundamentally respect human rights in their daily work and in all their business decisions. Supervisors serve as role models in this regard.

The Human Rights Officer as set out in the German Supply Chain Due Diligence Act works in two committees that are responsible for complying with human rights in our own business area and our own supply chain, respectively. The Corporate Sustainability department is represented on both committees and serves as an interface here. The entire Executive Board is responsible for implementing the Corporate Responsible Sourcing Policy for the supply chain. The Executive Board appoints the Supply Chain Committee (SCC) to fulfill these responsibilities. The Human Rights Committee (HRC) is responsible for our own business area, while the Human Rights Policy for Own Business Operations regulates the details.

The SCC mandate for the Aurubis Group supply chain is defined in the Aurubis Corporate Responsible Sourcing Policy. The SCC comprises senior management in the purchasing departments Commercial, Corporate Procurement, and Corporate Energy & Climate Affairs in addition to the Corporate Compliance, Corporate Sustainability, Corporate Environmental Protection, and Health & Safety (OHS) departments.

Responsibility for fulfilling the specific processes for meeting due diligence in procurement lies with the purchasing departments, more specifically the Commercial and Corporate Procurement departments, along with Corporate Energy & Climate Affairs.

The Corporate Compliance and Corporate Sustainability departments are involved in the concrete risk analysis for

medium and high-risk business partners. The Corporate Environmental Protection department and OHS are involved in the risk assessment on an event-driven basis.

4. Human rights risk management

Process description for risk identification through to risk management

With the Corporate Responsible Sourcing Policy, Aurubis aims to avert or mitigate, wherever possible, all human rights and sustainability risks to be assessed in the supply chain in accordance with the standards and legal provisions detailed above, among others.

The risk identification and risk management process for identifying, averting or mitigating the above-mentioned human rights risks is a risk-oriented, partially automated end-to-end supplier and supply chain screening process that comprises the identification of a supplier, the materials supplied, or the goods and services provided, the collection of relevant data from external sources and questionnaires, a risk assessment of the supplier and the respective supply chain, and risk management and reporting.

The due diligence processes described above are carried out before new business relationships are established. The corresponding due diligence audits and analyses are repeated during the business relationship at risk-appropriate intervals or when changes become known regarding the risk of human rights violations or ESG violations, for example.

If Aurubis detects any of the human rights risks listed above in Section 2, Aurubis will work with its suppliers and (as needed) the relevant authorities, international organizations, civil society, and affected third parties to help improve and track performance in order to avert or mitigate these risks in the supply chain. Aurubis will suspend or terminate cooperation with upstream suppliers if attempts to mitigate any of the risks defined above fail.

Risk analysis

The analysis process for risks in the supply chain and in our own business area — the latter including the Aurubis sites in Germany, Belgium, Bulgaria, Finland, Spain, Italy and the US — is based on the BAFA Guidance and divided into an abstract and a concrete risk analysis.

As the basis for implementing our due diligence obligations, we conduct an abstract risk analysis for our own business area and for the supply chain with respect to potential human

¹ Local communities are groups that live close to the production sites of our suppliers and our own sites and could therefore be impacted by our activities or the activities of our suppliers. This may also, but not exclusively, include indigenous populations.

rights violations. Both country-specific risks and sector-specific or material-specific risks are considered for the supply chain risk analysis.

The analysis of human rights or environmental risks and impacts is updated annually and event-driven if there is a considerable change in a company profile or business activity.

The risk analysis in our own business area is based on the various rights-holders (see definition of rights-holders on [page 3-4](#)) and their respective activities or roles with respect to Aurubis' business activities. The results of the risk analysis serve to orient our focus on potential human rights and/or environmental risks that could arise either from our own business activities at our sites or in our direct supply chain.

To verify the identity/integrity of business partners and the supply chain, we use a risk-oriented process referred to as Business Partner & Supply Chain Screening (BPS). The purchasing departments, i.e., the Commercial and Corporate Procurement departments as well as Corporate Energy & Climate Affairs, are responsible for conducting the BPS process. It is based on established international guidelines and legal standards and is expanded continuously, especially with respect to the requirements of the recommendations for transposing the German Supply Chain Due Diligence Act (LkSG) enacted by the Federal Office of Economics and Export Control (BAFA).

The process description based on the Corporate Responsible Sourcing Policy stipulates that each new business partner undergo an IT-supported screening process (BPS). The process is divided into an abstract and a concrete risk analysis. First, the business partners are assessed with regard to potential violations of human rights in relation to the business partner type and purchasing area. This is based on country risks and sector or material-specific risks. This determines how detailed the concrete risk analysis of the business partner should be. If business partners are classified as medium or high risk in the abstract risk analysis, the BPS process stipulates a detailed concrete risk analysis for the business partner. This consists of an inquiry about sustainability criteria and obtaining a screening report from an external provider covering compliance, finance and ESG aspects.

The Corporate Compliance and Corporate Sustainability departments are involved in the concrete risk analysis for new business partners with a medium to high risk indication. This focuses on the topics of human rights compliance, anti-corruption, working conditions, work safety, and environmental protection, as well as the OECD principles for responsible supply chains and certification by third parties.

When it comes to suppliers, the processes and management systems the supplier implements to reduce relevant risk topics are assessed. Furthermore, results from external data sources are analyzed to determine potential risks (including sanctions, incidents related to human rights or governance, compliance with standards, financial stability) in connection with the respective supplier.

We also take human rights complaints from third parties and reported incidents into account in our management process. Employees, business partners, and other third parties can submit tips regarding risks and violations using the internet-based whistleblower system as well as by email and telephone. These tips/complaints represent an important element of Aurubis' risk management and can trigger an event-driven risk analysis.

Any human rights or environmental risks identified are then assessed in our management process, meaning they are appropriately prioritized and weighted. The criteria applied are: the probable severity of the identified risk, the irreversibility and probability of the occurrence of any realized risk, as well as the extent of our leverage on the supplier and the magnitude of our share of causation regarding the identified risk at the supplier. The prioritization and weighting of the identified risks are carried out on both an individual basis and comprehensively for all identified risks and suppliers as well as the company's own business area.

The results of the analysis of human rights and environmental risks and their characterization and weighting are incorporated into our corporate decision-making processes with regard to supplier selection, business partner management, and our own business operations. The prioritization and weighting of identified risks creates the foundation for identifying appropriate measures.

The Human Rights Officer and the bodies established accordingly — the Human Rights Committee for our own business area and the Supply Chain Committee for the supply chain — regularly discuss relevant findings for our human rights management processes and make the necessary decisions regarding the measures to be thusly taken. In addition, we use the results as a basis for creating and, where necessary, adapting internal regulations, processes and training measures to reflect the changing requirements for our due diligence processes.

Aurubis' prevention, mitigation and remedial measures

If potential risks or specific violations of human rights or environmental rights are identified during the risk analysis, measures or points for clarification are formulated to increase the level of information on the potential risks, to mitigate specific risks, or to prevent, terminate or minimize the scope of the violation. The measures are defined by the Corporate Sustainability and Corporate Compliance departments, and the purchasing departments communicate them to suppliers. These measures should focus on preventing and remedying identified risks or violations. This process is an integral part of our communication with the supplier.

Preventative measures

If a risk is identified, appropriate preventative measures are developed and established and undergo risk-based monitoring in the company's own business area or in the supply chain. The measures must be suitable for averting or minimizing human rights and environmental risks.

If a risk is identified with regard to **direct suppliers**, appropriate preventative measures are established with respect to these direct suppliers, and their implementation undergoes risk-based monitoring.

If we have substantiated knowledge of indications that an **indirect supplier** may have violated its obligations, we will also take appropriate preventative measures and thus also support our indirect suppliers in complying with human rights and environmental obligations. This includes raising awareness among our suppliers and business partners through our [Code of Conduct](#) as well as our exchange formats known as "ESG dialogues".

In addition, appropriate training options for the continuous and target-group-specific skills development for **our own employees** play an essential role here.

We review the effectiveness of our measures for averting or mitigating negative human rights and environmental impacts in our own business area and in the supply chain at least once a year and on an event-driven basis. Here we employ various risk-based instruments in our own business area, such as employee surveys; the implementation of the defined measures by the supplier is closely monitored using our business partner screening process. This is to assess the extent to which the measures have had the intended impact and can therefore be deemed effective, and whether and which additional measures might subsequently be necessary.

Remedial actions

If we become aware of an imminent violation or a violation that has occurred of the statutory prohibitions of the LkSG or

of our Code of Conduct for business partners and our own business operations, we immediately take remedial measures to minimize, terminate or prevent such violations.

The remedial measures must prevent or remedy the violation in our **own business operations**. If violations are identified in **a direct supplier's** business area, we take immediate remedial action to prevent or remedy the violation, or minimize the scope of the violation. If there is substantiated knowledge of a violation by an **indirect supplier**, we draft a concept for preventing, remedying or minimizing human rights or environmental violations and ensure it is implemented.

To determine the effectiveness of our remedial measures, we conduct assessments using various instruments, such as site audits and employee surveys in our own business area along with ESG dialogues, documentation checks, site visits by Aurubis employees, and independent assessments in the supply chain. Although we base our risk management on the **"stay and improve"** principle, we reserve the right to terminate the business relationship in accordance with the provisions of the LkSG if measures are not accepted, have no effect, or our influence proves insufficient.

Complaints procedure

Any person can inform Aurubis about human rights or environmental risks, as well as of violations of human rights or environmental obligations that have arisen in Aurubis' own business area or result from its economic activities with direct and indirect suppliers. Complaints can be submitted via our **Compliance Portal**, the **whistleblower system**: www.aurubis.com/en/Responsibility/whistleblower-system

This portal can be contacted in different languages by online form or email. There are no disadvantages for whistleblowers for making a report, and the confidentiality of the whistleblower's identity and data protection are guaranteed. We consistently investigate all reports. The facts of the case are discussed with the whistleblower and the whistleblower is kept informed about the progress of the proceedings.

The effectiveness of our complaint procedure and the corresponding individual proceedings are reviewed at least once a year and on an event-driven basis as needed. This ensures that all indications of human rights and environmental risks or violations reach Aurubis and are handled carefully.

In fiscal year 2023/24, we were in a transitional phase as we introduced a new tool that we intend to implement in fiscal year 2024/25 as part of our continuous efforts to optimize the complaints procedure.

Reporting obligations

Aurubis undertakes to prepare a report on the fulfillment of due diligence obligations in the past fiscal year at least once a year and to make it publicly available on our website free of charge for a period of seven years within the set deadlines. The information is provided in a manner that is understandable and accessible to stakeholders and the public. Aurubis takes into account international reporting principles such as accuracy, clarity, comparability, reliability and timeliness.

The report details the human rights and environmental risks or violations of human rights or environmental obligations Aurubis has identified, what steps we have taken to fulfill our duty of care, how the impact and effectiveness of the measures are assessed, and what conclusions have been drawn from the assessment for future measures.

The reports on the due diligence audits of our smelting and refining sites are made publicly available.

Aurubis' annual reports pursuant to Section 10 LkSG are published on the global Aurubis website. Aurubis' sustainability reports and the policies, commitments, etc. referenced in this policy statement are also available there.

Regular review and continuous improvement

The Supply Chain Committee assesses the effectiveness of supply chain due diligence policies and procedures regularly and on an event-driven basis, once a year at least, to ensure continuous improvement.

The Human Rights Committee proceeds accordingly in Aurubis' own business area to ensure continuous improvement and process control.

The review of the procedures takes findings from the investigation of information submitted via the complaint procedures into account.

For specific supply chains for materials containing gold, silver, tin and copper — and whenever deemed necessary based on the risk profile — Aurubis takes particular care to conduct third-party audits to ensure the appropriate implementation of Aurubis' due diligence practices for responsible supply chains from conflict-affected and high-risk areas.

These audits cover all activities, processes and systems used by Aurubis to implement due diligence for supply chains from conflict-affected and high-risk areas. This includes the relevant policies and procedures, Aurubis' monitoring of the respective supply chains, communication with actors in these supply chains, the information disclosed to downstream companies

about suppliers, the supply chain and other traceability information, Aurubis' risk assessments including, where applicable, on-site investigations, and Aurubis' risk management strategies.

5. Prioritization and weighting of the identified risks from the 2023/24 risk analysis

Based on the overarching risk analysis, our Business Partner Screening tool was used to identify issues that represent an actual risk in our immediate supply chains for the 2023/24 fiscal year. The identified risks were then assessed in relation to the factor's influence and causal contribution taking appropriateness criteria, such as the severity of the determined risk, probability of occurrence, and irreversibility, into account. To ensure our actions are as effective and preventative as possible, we are initially focusing our human rights due diligence on the following priority human rights and environmental risks that have emerged from the risk assessments carried out in the 2023/24 fiscal year:

- » Disregard for occupational safety and work-related health hazards
- » Prohibition of unequal treatment in employment
- » Prohibition on causing detrimental changes to the soil, water pollution, air pollution, harmful noise emissions, or excessive water consumption

For our own business area, we prioritize the following risk:

- » Prohibition on causing detrimental changes to the soil, water pollution, air pollution, harmful noise emissions, or excessive water consumption
- » Disregard for occupational safety and work-related health hazards

The priorities thus defined serve as a guide for drafting measures to prevent and mitigate risks, for the planning of future training course content inside the company or at selected suppliers, and for the further alignment of our human rights risk management system.

Our report to the Federal Office of Economics and Export Control (BAFA) provides detailed information on the identified risks, their assessment, and the measures taken in the respective individual cases.

6. Expectations of employees and suppliers

The risk analysis is used to derive both fundamental and targeted expectations of our employees and suppliers.

Respect for human rights is enshrined in the Aurubis Group corporate culture and is part of our shared values. Our employees are required to comply with our [Code of Conduct](#) and to align their professional actions with the guidelines and principles detailed therein, in particular with regard to respect for human rights and the anti-discrimination guidelines.

Furthermore, our suppliers' commitment to our human rights and environmental expectations is an indispensable prerequisite for any form of cooperation. Our [Code of Conduct for Business Partners](#) forms the basis for our supplier relationships. It sets out our basic principles, binding standards, and sustainability requirements. In addition, our corresponding sustainability expectations are set out in our long-term primary raw material contracts. We also communicate and explain our expectations to some of our suppliers through ESG dialogues.

Furthermore, targeted expectations of suppliers are developed as part of our Business Partner Screening, taking into account the nature and scope of the identified risk. These range from the implementation of human rights and/or environmental policies and measures to adjusting their management approaches to comply with international standards and a commitment to industry initiatives such as The Copper Mark.

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