

Risk and Opportunity Report

Integrated risk and opportunity management

Risks and opportunities are elements of our business activities and are essential to the company's success. This is even more critical in times of new criminal threats, ongoing geopolitical crises, and unstable global economic developments. As part of our operating business and strategic management, we weigh opportunities and risks against one another and ensure that they remain balanced. We particularly strive to identify and evaluate risks and opportunities as early as possible. We continued to use and advance this approach over the past fiscal year as well.

Aurubis AG's risk and opportunity situation is strongly influenced by the Aurubis Group's risk and opportunity situation. In this respect, the statements of the company's management on the overall assessment of risks and opportunities also serve as a summary of Aurubis AG's risks and opportunities.

Risk management system

Our objective in risk management is to manage and monitor the risks associated with our business with the help of a risk management system (RMS) tailored for our activities. It is extremely important to identify and monitor risk development from an early stage. Furthermore, we strive to limit the negative effects of risks on earnings by implementing appropriate and economically sound measures.

Risk management is an integral component of the centralized and decentralized planning, management and monitoring processes and covers all of the Aurubis Group's main sites, business sectors, and central functions. The planning and management system, risk reporting, open communication culture, and risk reviews at the sites create risk awareness and transparency with regard to our risk situation, and promote our risk management culture.

Risk management officers have been appointed for all sites, business sectors, and central functions, and they form a network within the Group. The Group headquarters manages the network. In addition to the risk management officers, a Group risk management function (the ICS and Risk Management department) was established in the Aurubis Group and reports directly to the CFO. The RMS is documented in a corporate policy.

Standard risk reporting takes place on a bottom-up basis each quarter using a consistent, Group-wide reporting format. The identified risks and risks that exceed a defined threshold are explained within this format. The likelihood of their occurrence and the extent of the damage they could cause are evaluated, and instruments and measures used to manage them are outlined. ICS & Risk Management assesses the risks registered with Group headquarters, qualitatively aggregates them into significant risk clusters, and reports them to the entire Executive Board. The report also establishes the basis for the report to the Audit Committee as well as external risk reporting.

Potential effect on earnings

in € million	>1	>5	>20	>50
Likelihood				
high	medium	medium	high	high
medium	low	medium	medium	high
low	low	low	medium	medium
unlikely	low	low	low	medium

In the quarterly reports to the Executive Board and the Audit Committee, the qualitatively aggregated risk clusters are assessed with due regard for risk management measures (net perspective) based on their probability of occurrence and the potential effect on earnings pursuant to the spreads included in the table, and are classified as low, medium or high.

Independent monitoring

The RMS is subject to routine monitoring and review. Internal Audit monitors risk management using systematic audits at least every three years. As a process-independent authority, it contributes to the correctness and improvement of the business processes, and to the effectiveness of the installed systems and controls. External audit firms are also commissioned as needed to assess focal areas of the RMS.

In addition, auditors review our early risk detection system within the scope of the audit pursuant to Section 317 (4) of the German Commercial Code (HGB) to ensure that it adheres to legal requirements. They report the audit results to the Supervisory Board. Furthermore, the Audit Committee deals intensively with risk management issues. ICS & Risk Management regularly informs the committee and the Executive Board about current developments.

Explanation of relevant risks

In the following, we outline the risks associated with our business, grouped into dedicated risk clusters. The main measures and instruments we use to counter these risks are also described here. We have separately indicated risks and risk-relevant issues that we currently classify as potentially medium to high.

Supply and production

The ability to keep the production facilities supplied with raw materials and equipment availability are of central importance for the Aurubis Group. We limit the associated risks by implementing the following measures.

To ensure the supply of copper concentrates for our facilities, we have entered into long-term agreements with a number of concentrate suppliers from various countries. This enables us to reduce the risk of production interruptions caused by possible supply shortfalls. The situation on the concentrate market is tight and influenced by shortages, so we cannot completely rule out any challenges supplying our primary smelters in the coming fiscal year. Although the long-term orientation of our supply agreements generally limits the risk of volatile treatment and refining charges on the spot market, we can only avoid the risks from the sharp drop in treatment and refining charges on the global markets to a very limited extent. Despite our extensive international supplier network, we consider the market to be subject to volatility regarding the availability of raw materials for our recycling plants, including industrial production and metal prices in particular. We are especially seeing the negative impact of the difficult economic circumstances in Europe and the volatile geopolitical situation, in particular on scrap collection and as such on scrap availability. Added to this are the purchasing activities of Asian metal smelters especially, which buy up scrap from the EU. Overall, the ability to predict the availability of recycling materials remains limited due to short-term agreements on these markets. We want to counter this development with regional

diversification, though at the same time we are aware that this could further increase volatility in refining charges for copper scrap and other recycling materials.

The material for the plants producing copper products mainly comes in the form of copper cathodes manufactured within the Group. This allows us to simultaneously generate higher added value and control the quality of copper products throughout the entire process.

Stocktaking risks are inherent in our production process, and we counter these with various analyses and by regularly taking inventory. We address production risks with asset life cycle management, forward-looking maintenance, and reserves of critical replacement parts, which reduce unplanned production shutdowns.

Additionally, we have introduced organizational measures to handle potential incidents that could result from events such as flooding or fire. As the catastrophic flooding at our site in Stolberg in July 2021 and Hurricane Helene at our site in Augusta (Georgia) in the US in September 2024 have shown, flooding and hurricanes poses significant physical climate risks. We therefore use global warming scenarios to regularly assess the long-term effects of physical climate risks on our main production sites with the aim of incorporating the resulting adaptation measures into our (investment) planning. Here our focus is on those physical climate risks relevant to us, such as flooding, water shortages/droughts, and all risks related to storms (including hurricanes, tornados, lightning strikes). Our parent plant in Hamburg is located near the Hamburg harbor and is protected from high water levels by extensive flood control measures (referred to as polders). Furthermore, we have alarm plans in place and train our employees by means of periodic drills.

To reduce the risk of potential production stops due to temporary interruptions of the gas supply caused by lower delivery quantities from Russia, a significant portion of our facilities have been upgraded and can now be operated using alternative energy sources. The risk of potential power outages caused by grid instability remains generally elevated due to the shutdown of baseload power plants. We have rolled out various measures designed to minimize the impact of possible blackouts on our production facilities and that would enable us to quickly bring equipment back online as soon as the power grid is stable again. We also monitor the supply situation outside Germany very closely. Due the diversified natural gas sources in our other production countries such as Belgium, Spain, Bulgaria and the US, we currently see no need to switch production to alternative energy sources there.

We deal with logistics risks by implementing a thorough, multi-step selection and evaluation process for service providers, by avoiding single sourcing as far as possible, and by preventively developing backup solutions. Global delivery and transport bottlenecks are still noticeable, and geopolitical developments and conflicts along key sea trading routes disrupt supply security as well. We rely on accelerated information processes in the supply chain and develop alternative scenarios on an ongoing basis to enable flexible reactions. We continuously monitor the movements of bulk carriers and container ships, increasingly turning to AI-supported analyses to ensure we predict delayed arrivals early on and can minimize their effects. To safeguard against risks related to weather, capacities and the climate, we depend on an international network of qualified partners and have contractually arranged alternatives at the ready to prevent losses. We also consider potential digital disruptions, such as cyberattacks on logistics systems, in our planning. We continuously monitor the limited passability of the Panama and Suez canals due to geopolitical crises and climate factors; any longer transit times or necessary rerouting are integrated into our planning.

The significantly increased supply risks on our main raw material markets described here have led us to raise the corresponding risk assessment from “medium” to “**high**”. We still classify the risk of the severely limited availability of our production facilities as “medium”.

Compliance/fraud

In fiscal year 2024/25, we combined the previous topics of compliance and criminal activity into the new compliance/fraud cluster. Our business model means we continue to be a possible target for (organized) crime and have to counter the threat posed by criminal intent in order to prevent possibly significant financial losses for Aurubis. The ever-developing steps established by the Executive Board to promote process, plant and Group security have strengthened our security architecture over the long term and contributed to resilience against future threats.

Like every international company, Aurubis is subject to a number of legal stipulations in different legal systems that are initiated or amended with very little lead time in some cases. This leads to a risk of legal disputes as well as official investigations and lawsuits against Aurubis or its business partners. In particular, there is a threat of risks connected to possible violations of antitrust and environmental regulations and of anti-corruption, labor and data protection laws. Investigations of possible breaches of the law can harm Aurubis in a number of ways. Identified violations can have serious consequences for both Aurubis as a group and for its employees and business partners. Fines, compensation claims from third parties, and reputational damage are particular threats. Compliance management or the corporate function responsible for the respective legal area (for example the Environmental Protection department) identifies, analyzes and addresses significant compliance risks. We counter legal and tax risks with organizational procedures and clear management structures that are developed continuously. Any unlawful activities are promptly investigated and remedied, and steps that can be taken under labor law or civil compensation claims that can be lodged against the responsible employees are reviewed. For a detailed explanation of the compliance management system, please see [Corporate Governance](#).

We classify the risks in this new risk cluster as “**medium**”.

Sales

In addition to supply and production risks, the Aurubis Group also faces sales risks, which we classify as “**medium**”.

Generally speaking, risks can arise from negative deviations from our predictions of the markets’ economic development, which we outline in the [Forecast Report](#). The order situation for rod is currently at a good level, still weighed down by weaknesses in the automotive industry. The order situation for shapes and flat rolled products is at a stable level.

On the sulfuric acid markets, we are currently well positioned with our diverse customer portfolio and can react flexibly to fluctuations. There is currently no marketing risk.

Thanks to economic analyses and estimates regarding economic trends, we are in a position to adjust our individual sales strategies to changing conditions as needed, thus countering any risks that arise.

We sell copper cathodes that are not further processed internally by Aurubis into semi-finished products on international cathode markets.

Sustainability

Supply chain risks (e.g., environmental pollution or human rights violations by suppliers) can damage Aurubis' image and reputation, possibly negatively impact our product sales, and could result in fines based on the German Supply Chain Due Diligence Act (LkSG). To fulfill our due diligence obligations set out in the principles established in our Responsible Sourcing Policy (RSP) for the supply chain area, we work with a Business Partner Screening (BPS) system based on OECD guidelines. In the reporting period, a cross-departmental project team continued to revise the existing BPS process. The RSP was updated at the end of the 2024/25 fiscal year. Following the principle of continuous improvement, the BPS approach will be reviewed in the coming fiscal year as well, for example in multiple audit processes throughout the year, to determine where it may need to be adjusted and to amend it as needed. A restructuring of responsibilities saw the role of Human Rights Officer transferred from the Supply Chain Committee to an individual person. The purpose is to ensure increased autonomy of the internal oversight mechanisms with regard to the appropriateness and effectiveness of our BPS, making an even stronger contribution to risk management.

Sustainability is a fixed component of our company strategy. We mitigate the risk that we might be unable to achieve our sustainability targets with concrete measures and corresponding key figures for managing these sustainability targets Group-wide. In addition, we are involved in initiatives related to sustainability issues such as climate and environmental protection and responsible supply chains. This includes Aurubis' commitment to the Copper Mark. This initiative audits the environmental, occupational and social standards at copper production sites, including mines, smelters, refineries and processing plants, and is based on the United Nations' Sustainable Development Goals (SDGs). For a list of the Aurubis sites certified by the Copper Mark, please see the (Group) Sustainability Statement [9 S2-3](#).

We still classify the sustainability risk as **“medium”**.

Energy and climate

Aurubis takes protecting the climate very seriously. We counter the risks posed by climate change with an energy management system and by consistently realizing energy efficiency and CO₂ reduction potential identified at all sites. Sustainability targets for 2030 were defined when the corporate strategy was refined. These include our CO₂-reduction targets that were validated by the Science Based Targets Initiative (SBTi) and contribute to limiting global warming to 1.5°C pursuant to the Paris Agreement on climate change. Accordingly, we want to reduce our absolute Scope 1 and Scope 2 emissions by up to 50 % and our Scope 3 emissions (CO₂) by up to 24 % per ton of copper cathode by 2030 compared to 2018. To help us reach these targets, we drafted a decarbonization roadmap that we continually update. The Group Decarbonization area within the Corporate Sustainability department is responsible for developing and steering the Group-wide decarbonization strategy, targets and roadmap as well as the climate transition plan. Group Decarbonization coordinates and steers the implementation of site-specific decarbonization roadmaps and assists the sites with advancement and realization. Changes in market dynamics, regulatory conditions, technological availability, or competitive pressure in the international arena, as well as investment decisions in additional growth projects, could negatively impact the feasibility of our targets. These external and internal conditions will be considered in target reviews.

We categorize climate risks as either physical or transition risks. The physical risks include those risks arising from extreme weather events, both in our plants and in the transport chain, that are described in the “Supply and production” section. We counter the risks in the transport chain through geographic diversification in the supply chain, by storing emergency reserves to maintain production, and by ensuring alternative logistics service providers are available, among other things. Furthermore, we observe water levels (flooding/low water) in the key waterways so that we can promptly initiate countermeasures to maintain our transport routes and our cooling processes, or deploy flood protection measures. As shown by the catastrophic flooding at our site in Stolberg in July 2021 and Hurricane Helene at our site in Augusta (Georgia) in the US in September 2024, flooding and hurricanes pose significant physical climate risks. We therefore use global warming scenarios to regularly assess the long-term effects of physical climate risks on our main production sites, with the aim of incorporating the resulting adaptation measures

into our (investment) planning. Transition risks include technological and political risks. While we welcome the accelerated expansion of renewable energies, it must be synchronized with grid expansion and the development of storage technologies so that the security of supply is always fully guaranteed and system costs remain affordable (technology risks). We have now fundamentally implemented suitable measures for increasing the basic security of supply at the respective sites. These include alternative energy-source options such as LPG or heating oil so that, in the event of a gas shortage leading to a shutdown of the gas supply, our German sites in Hamburg, Lünen, Emmerich and Stolberg are not affected, or only affected to a limited extent. We see these restructuring measures as a helpful step towards ensuring we can maintain production in the event of a crisis. Due to industrial heat extraction and feed-in to the Hamburg district heating network, the site would be supplied preferentially in a crisis to maintain recipient households' heating. Pirdop was connected to the gas network in summer 2025 as planned, providing an additional supply source. No natural gas is currently used for production at our Pori site. Our Belgian sites in Beerse and Olen along with the Berango site benefit from a diversified supply concept compared to Germany. We are preparing to switch from natural gas to hydrogen to further advance our decarbonization targets. In 2021, we successfully carried out a test series on the use of hydrogen in the anode furnace. In 2024, investments were made in switching out the anode furnaces to enable the use of hydrogen. As soon as hydrogen is available at competitive prices, it can be put to immediate use. Measures for boosting flexibility include control energy supplied by the tankhouse (already realized), subsidized partial shutdowns for electricity bottlenecks, and the use of our power-to-heat facility to generate steam with electricity when there is excess electricity. Furthermore, we have had an energy supply contract in place since 2010 that secures most of the electricity our main German sites need in the long term.

When it comes to electricity, due to the blackout in Spain we started a survey for all sites regarding blackout measures to define steps that would enable a controlled rampdown and minimize damage to the facilities in the case of a supply disruption. This can prevent damage to pipelines and furnaces due to solidifying copper or condensing acid.

Constantly changing overall political conditions mean political risks have a significant influence on our business:

- » Mounting burdens resulting from changes in potential cost drivers such as German and European emissions trading, grid charges, and the eco-tax are generally difficult to quantify reliably.
- » As part of the general grid fee reform (referred to in German by the acronym AgNes), the Federal Network Agency in Germany (Bundesnetzagentur, BNetzA) also intends to reform individual grid fees in accordance with Section 19 II 2 of the Energy Grid Fees Ordinance (StromNEV). According to the BNetzA's considerations publicized so far, the baseload model will be discontinued starting in 2028 after a transitional period and only flexible consumption behavior will be incentivized. Since production restrictions only allow for this to a very limited extent or not at all for Aurubis, the sites in Hamburg and Lünen face an increased risk of sharply rising grid fees.
- » From 2021 to 2030, the copper manufacturing and processing sector will continue to receive free allocations for direct CO₂ emissions and electricity price compensation due to its carbon leakage status. For all sites taking part in emissions trading, free allocations of carbon credits have been approved in the amount applied for since 2021. The level will remain constant until 2025. However, from 2026 we will start to see significant cuts in these free allocations, since the factors involved in the calculation have dropped significantly. We still do not anticipate any additional net costs from the possible need to purchase carbon credits for the company as a whole through 2030. The price for carbon credits has fallen sharply in recent years, though we expect prices to rise again as allowances decrease. The electricity price compensation for indirect CO₂ costs still amounts to at least 50 % of the cost burden. The decarbonization targets described above include different projects at the individual production sites, such as the test series for the direct use of hydrogen in the copper production process and the conversion of the anode furnaces in Hamburg. Generated solar power will increase to 38,900 MWh in the 2025 calendar year at our site in Pirdop. We have also been feeding CO₂-free industrial heat from our Hamburg site into enercity's district heating system to power the HafenCity East district for a number of years now. During the major shutdown in Hamburg in 2024, additional sections of the Plant East contact acid plant (KAWO) were successfully retrofitted and came online and delivered our CO₂-free industrial heat to the Hamburg Energiewerke utility company in the 2024/25 heating season as scheduled. This expansion now means up to an additional 28,000 households can be supplied with CO₂-free industrial heat. We are also moving forward in converting our power supply contracts to focus on CO₂-free electricity. Since January 2023, our Olen site in Belgium has been powered by 12 MW from the SeaMade

Offshore Wind Farm with a ten-year green power purchase agreement (PPA). We are reducing the site's CO₂ emissions by 42,000 t of Scope 2 emissions per year with this contract.

- » Total emissions for all production sites in calendar year 2024 amounted to 5.54 million t of CO₂ (Scope 1 + 2: 0.995 million t of CO₂; Scope 3: 4.55 million t of CO₂). In copper production, we also extract gold, silver, platinum, palladium, additional precious metals, and building materials such as iron silicate stone along with copper. If produced by other companies using alternative processes, the additional metals and by-products would generate significantly higher CO₂ emissions. Based on an external study referencing published emission factors, the conventional production of the above-mentioned metals and by-products extracted at Aurubis would lead to an additional 3.5 million t of CO₂ emissions each year. Aurubis' energy-efficient processes avoid these additional emissions, due in part to the advantages of the smelter network, which means that the metals we produce, including copper, have a very small CO₂ footprint.

We face market risks primarily from price developments for electricity, natural gas, and CO₂, which are difficult to predict. While early purchases help us fundamentally hedge our exposure to market price fluctuations to a certain extent, the effectiveness of these hedging activities against continually rising prices is limited. We have been compensated for CO₂ costs to energy companies that are included in the electricity price (indirect emissions) under the State aid guidelines, including the super cap in Germany and Belgium. While electricity price compensation is an important instrument that provides cost relief in the context of international competition, in practice it only compensates for about 50 % of indirect CO₂ costs. The remaining portion is still exposed to the risk of rising CO₂ prices. Customers are also increasingly demanding transparent targets and strategies related to effective production processes and energy and CO₂ efficiency. This customer demand could influence future copper product sales, particularly when it comes to customer acquisition and retention. We respond to these calls for transparency by annually participating in a variety of climate reporting systems that are independently assessed, such as the CDP (formerly the Carbon Disclosure Project) and through our commitment to realizing the SBTi targets, as described above.

We continue to classify the energy and climate category and the associated risks as **“high”**.

Environmental protection

Our production comes with an ecological footprint that we try to keep as small as possible using suitable measures. Our goal is to continue shrinking our footprint. There is the fundamental risk that environmental laws and regulatory provisions could be further tightened, which would necessitate additional environmental protection measures with the accompanying additional expenditure. The production and marketing of products could also be restricted. We regularly raise our concerns with national and European policy makers.

Furthermore, environmental risks resulting from the possible failure to comply with threshold limits and from non-fulfillment of requirements could have legal implications. We counter this risk by ensuring our production facilities operate in compliance with the law and as environmentally soundly as possible. Our investment in reducing diffuse emissions at the Hamburg site is an excellent example of this. We fulfill high environmental standards and develop them continuously, as confirmed by annual certifications in accordance with ISO 14001 and EMAS in addition to another uptick in the number of points on the EcoVadis rating. We consider ourselves to be well positioned for the future here as well. Nevertheless, operational incidents with an adverse impact on the environment can never be completely ruled out. To assess our environmental risks, an external expert assisted us in conducting a risk analysis for the respective production sites. This analysis investigated risks in a wide range of environmental topics and evaluated them for the site in question.

Overall, we continue to classify environmental protection risks as **“medium”**.

Finance and financing

Metal price and exchange rate fluctuations represent a potential risk in the buying and selling of metals. We mainly reduce this risk by means of foreign exchange and metal price hedging. We hedge metal surpluses daily using financial instruments such as spot and forward contracts. Similarly, spot and forward exchange contracts are used to hedge foreign currency risks. We minimize such foreign currency risks, deriving from exchange rate fluctuations for metal transactions concluded in foreign currencies, in this manner. We only select firms with a good credit standing as counterparties for hedging transactions to minimize the default risk.

We hedge expected cash inflows transacted in foreign currencies, especially the US dollar, partly by using options and forward exchange transactions. We will also continue this practice in the future and expect to reduce the risks deriving from metal price and exchange rate fluctuations to a reasonable level by taking such measures. Furthermore, our site in Augusta in the US (Aurubis Richmond) has a counteracting effect with regard to our US dollar exposure.

Default risks deriving from trade accounts receivable are covered to a great extent through use of commercial credit insurance. We only permit internal risks to a very limited extent and after undertaking a review. We closely monitor the development of any outstanding receivables. During the reporting period, there were no significant cases of default concerning receivables. We also do not foresee any increased risks for the future.

Risks that could arise from a resurgence of the sovereign debt crisis in the euro area could potentially have a cumulative impact on the individual risks described in this section, for example those related to default on receivables or liquidity. For this reason in particular, we classify the risks deriving from finance and financing as “**medium**”.

Information technology

At Aurubis, IT risks exist in relation to the three information security objectives confidentiality, availability and integrity of information and data. These can impact areas such as supply, production and sales, as well as communication and collaboration between departments and sites as well as with customers and partners. These risks were taken into consideration in the company’s risk assessment.

We counter IT availability risks for our systems with measures like continuous monitoring, redundant infrastructure, and ongoing optimization to incorporate the latest developments in IT architecture. We counter the risks of possible incidents or disasters with the redundant design of particularly critical IT infrastructure, as well as data recovery and continuity plans and the related tests and drills. We limit the risks that can result from unauthorized access to company data, as well as cybercrime, by restrictively issuing access rights, carrying out security reviews, and using modern security technologies.

To fulfill the heightened protection requirements stemming from the elevated threat potential worldwide and experience drawn from the cyberattack on Aurubis in October 2022, we have invested in additional

security technologies and have analyzed the associated processes, making changes in some cases. Moreover, we have third parties regularly review and evaluate the cybersecurity measures, and we use their findings to improve these measures. The IT Operations division within Corporate IT was also successfully certified in accordance with ISO 27001. We continue to classify the IT cybersecurity risk as “**high**”.

As the Group prepares for new EU legislation (e.g., NIS 2, among others), Corporate IT is assisting the sites with numerous initiatives in production IT (OT). These include the drafting of the Corporate OT Security Policy and support with implementation, such as with OT risk management workshops at all sites. Furthermore, Corporate IT is coordinating the implementation of the NIS 2 directive via the information security management system.

Personnel

Aurubis places a strong focus on securing qualified experts and managers. An aging workforce, a shortage of skilled workers, and new expectations among younger generations are intensifying the competition for talent. We started actively developing our company culture further in 2024 as a result. In an analyses phase we investigated how employees view the culture and identified seven action areas. These are being addressed with tools, workshop series, various discussion formats, and through culture ambassadors.

We are continuing to strengthen our employer brand in parallel, expanding our recruiting and talent management excellence. We focus on personnel marketing campaigns tailored to specific target groups and with an emphasis on diversity and on expanding our university marketing activities, particularly for key metallurgical positions. We find candidates for entry-level positions and our trainee program through our student network.

Our investment in training and continuing education tailored to company need remains a central element for countering the lack of skilled workers. Hamburg and Lünen are home to state-of-the-art training workshops where we offer award-winning industrial and business-related vocational education and dual study programs. We use social media to reach the younger target group directly. We focus on not only hiring new talent but also on developing and supporting in-house talent on their individual paths across departments and countries, and sustainably safeguarding and fostering key expertise and skills for the future.

We additionally promote diversity, inclusion and equal opportunity to continue advancing our organization and create a work environment where everyone feels welcome. We actively promote equal treatment in the entire employee journey and a clear zero tolerance approach to any kind of discrimination, hate and prejudice through regular mandatory training seminars, for example. This is all supported by a standardized process for tracking and processing reported cases of discrimination and by appointing and empowering our discrimination officers.

We continue to classify personnel risks as “**medium**”.

Other

Occupational health and safety are high-priority areas for us. Responsibility for these issues rests with the management, the supervisors, and each individual in the company. All production sites are certified in accordance with ISO 45001. Detailed risk assessments, audits, training and campaigns to strengthen employees’ safety and health awareness support our goal: Vision Zero, meaning zero work-related accidents, injuries and illnesses. Stringently monitoring our safety performance and deriving the corresponding measures remain key additional steps towards achieving our vision.

Measures that had been introduced since early 2024 in a multi-phase program to revise key standards as well as training programs at all levels of the hierarchy continued during the past fiscal year.

In June 2025, an employee of a contractor was involved in a fatal industrial accident while performing maintenance work on a furnace. A comprehensive analysis of the cause of the accident was conducted. Appropriate measures to reduce risks when working with contractors were implemented at all sites. Contractor management remains a key focus of the ongoing safety program.

A number of factors are relevant for the successful implementation of our strategic growth projects. There are also risks, such as high energy, material and operating costs, market shifts, and the availability of suitable personnel, that could indicate the need for revisions of priorities, the respective project scope, and the schedule. We counter these with a clearly defined stage-gate process for approval of strategic projects, project organization and management specifications that include monitoring critical KPIs, and active staff and talent management. We also introduced a corresponding strategic early warning system to predict possible strategically relevant changes and market developments. Overall, we consider the strategic project

pipeline very robust because we can respond to possible changes at an early stage when implementing the respective projects. Nevertheless, the possibility of timeframe or financial changes to project results cannot be completely ruled out. We classify the remaining risk as “**medium**”.

We largely cover selected risks with insurance as well. We rely on the expertise of an external insurance broker for this purpose.

Internal control system

Objective

The internal control system (ICS) at Aurubis comprises the principles, processes and measures to ensure the effectiveness and efficiency of our business activities, the correctness and reliability of our reporting, and compliance with the legal regulations that apply to the company.

Moreover, the ICS serves to identify risks that could result from potential statutory violations and/or that could endanger the company’s assets or objectives. It is also an information system that supports the management and stakeholders in fulfilling their duties.

As such the ICS contributes to the following targets:

- » Safeguard the effectiveness and profitability of our business activities (this includes asset protection, along with preventing and detecting financial losses)
- » Ensure the correctness and reliability of our accounting (internal control and risk management system related to the Group accounting process)
- » Comply with the legal provisions applicable to the Aurubis Group as well as our internal Group standards

The ICS has been established as a fixed component of our central and decentral internal control and monitoring processes. It also includes a compliance management system, which reflects the company’s risk situation (see [9 G1-1](#) in the (Group) Sustainability Statement).

The ICS is documented in a corporate policy and aligns with the principles of the Committee of Sponsoring Organizations of the Treadway Commission (COSO) and the Three Lines Model of the Institute of Internal Auditors.

Responsibility, risk assessment, and control catalogue

The Aurubis AG Executive Board bears overall responsibility for the ICS and ensures the appropriate tone from the top, and tone at the top, with targeted messages and an extensive catalogue of corporate policies. The ICS & Risk Management corporate function, which reports directly to the CFO, supports the Executive Board with this by providing (critical) reviews of the sites and the corporate functions, systematically developing the ICS further, and organizing the respective reporting formats.

The ICS & Risk Management function carries out an annual analysis to identify the risks for the main reporting entities, key business processes, and significant value drivers relevant for the ICS. Building on this foundation, the existing control catalogue is analyzed to determine whether it seems suitable for reducing these risks or if additional or supplementary controls should be introduced. These controls include authorization concepts, access and entry restrictions, the separation of functions, completeness and validity checks, and monitoring limits. The sites, business areas, and central functions established in the risk analysis are responsible for the implementation, execution and effectiveness of the controls and for decentralized regulations and directives. The respective organizational entities have appointed ICS officers for decentralized coordination of these duties. Software-supported reporting on the deployed controls is issued quarterly from the bottom up. The ICS & Risk Management function is responsible for both this reporting process and the corresponding reporting to the Executive Board and the Supervisory Board's Audit Committee.

Monitoring

The ICS is subject to regular process-integrated and process-independent monitoring.

The effectiveness of the controls implemented in the processes is reviewed in the quarterly reporting process using the dual-control principle within the responsible division or across departments, depending on the design of the control (process-integrated monitoring).

To reinforce process-independent monitoring, we hired a large auditing firm to conduct an ICS system assessment for the Aurubis AG central functions during the past fiscal year. Most of the indications and recommendations for improvement from this assessment have already been incorporated into the processes described above under "Responsibility, risk assessment, and control catalogue". However, this also means that we will be undertaking additional improvements in the next fiscal year, including further

refining our control catalogue and obtaining confirmations from the responsible managers of the sites, business areas, and central functions regarding the effectiveness of their respective local internal control systems. These confirmations will be a crucial element for evaluating the effectiveness of the ICS from the Group perspective.

Another improvement is that we will continue intensifying Internal Audit's monitoring of the effectiveness of our ICS in the future. Internal Audit will thus be contributing to the correctness and improvement of business processes as well as — in addition to the process-integrated monitoring described above — to the effectiveness of installed controls.

The Audit Committee also regularly assesses the effectiveness of the ICS. Together with the Executive Board, Internal Audit and the Group Compliance and ICS & Risk Management corporate functions regularly inform the committee about current developments.

Internal control and risk management system relating to the Group accounting process

(Report pursuant to Section 289 (4) and Section 315 (4) of the German Commercial Code (HGB))

The objective of the internal control system (ICS) for the accounting process is to ensure that

- » Financial statements are prepared in compliance with regulations
- » Accounting procedures are reliable and performed correctly
- » Business transactions are thoroughly recorded in a timely manner as prescribed by law and the Articles of Association
- » Legal norms and internal guidelines on accounting are observed

Process and responsibility

As the parent company, Aurubis AG prepares the Aurubis Group's consolidated financial statements. The financial reporting of the consolidated Group companies that are included in the consolidated financial statements takes place prior to this process. These Group companies prepare their financial statements locally and transfer them to the Corporate Accounting department via a defined uniform Group-wide data

model. The Group companies are responsible for compliance with applicable Group-wide guidelines and procedures, as well as for the correct and timely execution of accounting processes and systems.

Main principles

The ICS based on the Group accounting process includes the following main principles:

- » Ensuring standardized accounting procedures in the preparation of the separate financial statements of Aurubis AG by means of systematically implemented controls, which are supported by manual accounting controls and other authorization and approval procedures (separation of functions, access regulations and limitations, the use of the dual control principle, guidelines on payment transactions)
- » Ensuring uniform Group accounting procedures in accordance with IFRS through the application of uniform accounting regulations and policies, central audit of reporting packages, analysis of deviations from the budget, and quarterly reporting as part of centralized discussions on earnings
- » Compiling external accounting and internal reporting by all Group companies in a uniform consolidation and reporting system
- » Overall consolidation of the Group financial statements by Corporate Accounting, which is responsible for the centralized consolidation, coordination and monitoring of the standards related to the schedule and the process
- » Giving the Group companies support in accounting issues by having central contact persons in Corporate Accounting
- » Clarifying special technical questions and complex issues related to specific cases with external consultants

Opportunity management system

Opportunity management is embedded as a central pillar within Aurubis' integrated strategy and planning framework. Alongside our risk processes, we systematically seek out and evaluate the factors that can strengthen long-term competitiveness and financial resilience. This involves continuously monitoring both internal initiatives and external market dynamics to capture emerging trends early and translate them into concrete growth pathways. The process is anchored in our annual strategy cycle but is reinforced throughout the year by operational and commercial functions, making opportunity recognition a shared management responsibility at every level of the Group. By aligning these insights with our corporate strategy and portfolio of strategic projects, we ensure that opportunities are actively pursued, measured against risks, and transformed into actionable initiatives that support sustainable value creation.

Explanation of relevant opportunities

Rising global demand for copper and metals of the future driven by megatrends

Global metals demand is undergoing a structural transformation, shaped by six megatrends that will define industrial growth for decades to come: (1) electrification, (2) artificial intelligence and advanced technologies, (3) defense and security, (4) renewable energy, (5) mobility and transport, and (6) urbanization and infrastructure development. Each of these megatrends drives a surge in demand not only for copper, but also for other metals that Aurubis produces across its broad multimetal portfolio, including nickel, tin, bismuth, silver, gold, selenium, tellurium and the platinum group metals to name a few.

The structural need is undisputed: Refined copper demand is projected to rise by nearly a quarter, from around 27 million t in 2025 to approximately 34 million t by 2040. Other metals critical to these megatrends will grow even faster — for example, bismuth demand is expected to triple, nickel requirements to rise by two thirds, and tin consumption to expand by 40 % within the same timeframe. These metals underpin the technologies of the future: copper and nickel for e-mobility batteries, bismuth for specialty alloys and green energy storage, platinum group metals for catalytic and hydrogen technologies, and tin for semiconductors and advanced electronics.

Aurubis is uniquely positioned to benefit from this broad-based expansion. Our multimetal production not only secures our exposure to the growth of copper but also diversifies earnings across high-demand elements. In doing so, we strengthen our resilience, broaden our role as a supplier of critical materials to multiple value chains, and underpin our contribution to global progress.

Changes in treatment and refining charges and market prices for our products

Aurubis' earnings profile is strongly influenced by the development of treatment and refining charges (TC/RCs) for copper concentrates, scrap and complex recycling materials, alongside market prices for our products such as wire rod, copper cathodes, sulfuric acid, and precious and minor metals. Treatment charges for copper concentrate are currently at low levels; should they develop more positively than anticipated, this would translate directly into additional earnings potential for the Group. Importantly, our diversified earnings model prevents overexposure to single elements of the business. Premiums for our copper products, continued strength in sulfuric acid markets, and broad diversification across end-use industries ensure stability and resilience. This balance allows Aurubis to maintain a positive financial trajectory even in a challenging pricing environment.

Increasing significance of critical raw materials and resource independence

Aurubis ranks among the global leaders in recycling copper and complex raw materials, with operating processes designed to minimize waste and maximize recovery of valuable metals. The company's low-loss approach ensures efficient utilization of raw materials and reinforces its recognized sustainability leadership by extracting greater value from each ton processed.

At the same time, the strategic relevance of critical raw materials is increasing sharply, as they form a cornerstone of both economic resilience and national security. Governments worldwide, including both the United States and the European Union, have identified copper, nickel, bismuth, antimony and platinum group metals — all part of the Aurubis portfolio — as critical to ensuring energy independence, technological sovereignty, and defense capability. Against the backdrop of global geopolitical tensions and supply chain vulnerabilities, the ability to secure access to these raw materials has become a matter of industrial policy and strategic interest for many sovereign nations.

Aurubis is positioned to play a central role in this landscape. By producing and refining metals included on critical raw materials registers, the Group provides reliable supply supporting the transition to renewable energy, the expansion of advanced mobility and digitalization, and the safeguarding of critical infrastructure. This strengthens Aurubis' relevance as a reliable supplier and long-term partner for customers, business partners, and policymakers. As such, Aurubis continues to evaluate opportunities to expand production of critical metals, thereby contributing directly to the resilience of economies and societies worldwide.

Advancing capabilities in complex raw material processing

The composition of both primary and secondary raw materials is becoming increasingly complex. Miniaturization in electronics reduces the concentration of individual metals, while modern concentrates often contain a higher share of impurities as well as valuable precious metals. These developments require advanced metallurgical expertise and sophisticated processing capabilities.

Aurubis has established itself as a leader in handling such complexity across its integrated smelter network. The Group continuously invests in targeted technical projects to optimize processes and enhance the efficiency of metal recovery. By streamlining production steps and deploying new process technologies, Aurubis is able to increase the intake of complex raw material feeds and recover an even broader spectrum of valuable elements. This not only secures access to future material streams but also supports margin stability by unlocking value from raw materials that are more difficult to process.

Through its ongoing commitment to advancing metallurgical expertise, Aurubis ensures that its network remains positioned at the forefront of complex raw material processing — a capability that is becoming increasingly decisive for competitiveness in global metals markets.

New material streams emerge with supply diversification opportunities

As the global economy transitions toward electrification and digitalization, increasing volumes of relevant material streams are reaching the market. End-of-life electric vehicles, batteries and consumer electronics contain complex mixes of a wide variety of metals that will enter the recycling chain in growing volumes over the coming decades. Materials such as copper foils from battery applications represent feedstocks that did not exist in meaningful quantities in the past but will gain significance.

Urban mining, the recovery of metals from products, buildings and infrastructure already in use, is expected to become an important source of future supply. These new flows, combined with the increasing availability of end-of-life scrap, expand the accessible resource base and will help to reduce dependency on primary supply from mining. Aurubis' technological capabilities in complex raw material processing provide a decisive advantage in capturing value from such streams. The Group's metallurgical processes are already designed to separate and recover a broad spectrum of elements, positioning the network to integrate these new inputs efficiently.

Tapping into new material sources not only broadens Aurubis' raw material base but also enhances resilience. Supply diversification across a wider range of feedstocks strengthens the Group's role as a reliable partner to suppliers seeking advanced recycling solutions. Over the long term, these developments reinforce Aurubis' strategic position as a key enabler of circular economy models and as a stabilizing force in global metals supply chains.

Digitalization as a driver of continuous process improvement, cost optimization, and synergies

Intense global competition underscores the importance of operational excellence within the Aurubis Group. Continuous improvements in processes and cost position remain a strategic priority, supported by a broad range of digitalization and efficiency initiatives.

Current digitalization projects focus on automation and data-driven optimization. One example is the implementation of advanced sampling and analysis technologies that enable faster, automated evaluation of metal content in raw materials. These systems provide quicker, high-quality results to suppliers and internal processes alike, raising efficiency while also enhancing service levels across the value chain. Similar automation is evident in the Aurubis Digital Factory program, where digital tools are deployed to support more precise decision-making, safer operations, and efficient resource utilization.

Several projects launched in the past year demonstrate the scope of these efforts. At Aurubis Olen, sensors now continuously monitor the condition of furnace cooling blocks, allowing predictive maintenance that reduces unplanned downtime, increases safety, and ensures consistent material quality. At the Hamburg plant, a new web-based logistics system mathematically optimizes the sequence and processing of incoming containers, reducing costs, increasing transparency, and improving planning reliability. Another

example is the introduction of LiDAR-based stockpile measurement, which enables automated, real-time monitoring of material volumes. This innovation delivers reliable data, improves safety, and significantly increases efficiency in material logistics. Together, these initiatives highlight how digital technologies are being applied across both production and logistics to enhance reliability, efficiency and customer service.

Alongside digital initiatives, the Group is implementing a range of process improvements and strategic projects aimed at debottlenecking production, ensuring more efficient use of assets, and optimizing the routing of material flows across the network. Synergies from the latest investments are also being realized: The ramp-up of Aurubis Richmond contributes additional blister copper to the system, while expansions in electrolyte and anode slime processing at the Belgian sites are being fully integrated into the Group's material flow. These steps collectively enhance network efficiency and reinforce Aurubis' competitive position.

By consistently advancing digitalization, operational excellence, and network synergies, Aurubis strengthens its ability to generate incremental earnings and maintains a resilient foundation for sustainable growth.

Capacity expansion linked with internationalization

In light of growing global demand for sustainable metal production and metal recycling, Aurubis continues to see growth potential from expanding processing capacities in regions with favorable market conditions. A key step during the reporting period was the successful start of the gradual commissioning of the first stage of Aurubis Richmond, the Group's first greenfield recycling plant in the United States. This facility marks a milestone for both Aurubis and the US market by establishing a domestic source of sustainable copper production at a time of rising demand and limited refining capacity. The ramp-up of the first stage is underway, and the second stage of the site will be commissioned in FY 2025/26.

The fundamentals underpinning the US market remain highly attractive. Refined copper demand is projected to rise to around 2.4 million t by 2040, while the country will continue to rely on annual imports of roughly 900 kt due to insufficient domestic refining. Aurubis Richmond contributes directly to closing this gap, creating "American copper for America" and supporting US ambitions for greater material independence. Given this backdrop, the US remains an appealing market for Aurubis, and the Group continues to evaluate suitable options for potential future growth.

Beyond North America, capacity expansions are also being implemented at existing European sites, such as enlarging the tankhouse in Pirdop, alongside initiatives to optimize material flows within the smelter network and secure sustainable supply. These steps enhance geographic coverage, increase resilience, and strengthen the Group's ability to respond flexibly to shifting global trade and regulatory conditions.

Circular economy solutions for our business partners, from scrap supply to refined metal

Aurubis collaborates closely with industrial customers and suppliers across the value chain to design solutions that advance the circular economy. This includes developing tailored products, providing specialized services, processing customer-specific raw materials, and creating "closing-the-loop" models that return valuable metals into the production cycle. The Tomorrow Metals commitment underlines this approach by offering certified products supported by life cycle assessments that transparently document CO₂ emissions compared with global benchmarks. The digitalization of customer and supplier interactions further enhances efficiency, service quality, and long-term loyalty.

Global market trends such as electrification, digitalization and the expansion of renewable energy are accelerating the demand for circular solutions. Copper is a globally traded commodity, but collection and sorting infrastructure is less mature worldwide. Europe is comparatively well positioned, and Aurubis already achieves a recycling rate of 45 % on copper cathodes, well above European and global averages. This leadership is reinforced by advanced multimetal processes that enable efficient recovery of copper and other valuable metals from a wide variety of production residues and end-of-life products.

Together with downstream customers in wire rod, shapes, bars and profiles, and flat rolled products, Aurubis has established a range of active partnerships to reclaim metal-bearing production waste and residues. These collaborations create closed material cycles in which metals are continuously recovered and returned to the economy as new products. Building on this success, the Group is focused on expanding closing-the-loop partnerships further, strengthening relationships with industrial customers and business partners, and delivering tangible progress toward a resource-efficient circular economy.

Innovations from future research and development activities

Research and development are integral to maintaining Aurubis' technological leadership and securing long-term competitive advantages. The Group's R&D efforts focus on developing innovative processes, adapting existing technologies, and improving efficiency across the smelter network. Particular emphasis is placed on resource-efficient processing of complex feed materials, enabling higher metal recovery while reducing energy intensity and environmental impact.

Building on established successes such as the patented black mass recycling process for batteries, Aurubis continues to refine and expand its metallurgical capabilities. The focus is increasingly on scaling and integrating these technologies into the broader production system, ensuring that future material streams can be processed reliably and profitably. This includes exploring new pathways for recovering metals from emerging feedstocks and enhancing throughput in existing facilities through process innovation.

By continuously advancing research and development, Aurubis secures its ability to treat increasingly diverse and complex raw materials, while opening up new opportunities for growth in recycling markets. These innovations strengthen the Group's role as a reliable supplier of critical metals for the technologies of the future, underpinning resilience and value creation across economic cycles.

Assessment of the Aurubis Group's risk and opportunity situation

No risks threatening the company's continued existence arose in the reporting year. There were no particular structural changes in the Group's risks. According to our current assessment, there are no risks that endanger the company's continued existence.

Both the Audit Committee (Supervisory Board) and the auditors ascertained that the Executive Board has taken the measures prescribed by Section 91 (2) of the German Stock Corporation Act (AktG) in an appropriate manner and that the legally required early risk detection system fulfills all requirements.

For a complete overview of company activities, the opportunities of the Group have to be considered in addition to the risks.

Part of the management report not subject to mandatory auditing

The Executive Board intensively addressed the risk management system (RMS) and the internal control system (ICS) during the past fiscal year 2024/25.

Risk Awareness was established as one of the seven core topics of the Group-wide Power for Performance culture campaign. On this basis, the ICS & Risk Management corporate function worked closely with the Executive Board to conduct Group-wide training for managers of the Aurubis sites and central functions to improve risk culture.

The Executive Board furthermore tasked a large auditing firm to compare the RMS with best practices and report back to them with the results. There was ultimately no significant need for adjustments or improvements.

Internal Audit oversees the ongoing assessment of RMS effectiveness in the Aurubis Group. This process-independent authority follows an annual risk-oriented audit plan and directly reports the results of its audits to the Executive Board. Internal Audit did not audit the RMS in fiscal year 2024/25.

The Executive Board and the Supervisory Board's Audit Committee regularly discussed the RMS.

The Executive Board is not aware of any matters indicating that the RMS is not appropriate or effective for Aurubis in any material respects. Nevertheless, an RMS — regardless of its design — cannot provide absolute security.

As with the RMS, the Executive Board also commissioned a large auditing firm to review the current status of the ICS and report the results to them. The improvement potential identified was consistently fulfilled during the fiscal year and included

- » Fundamentally revising the ICS Policy
- » Refining the Group-wide risk assessment process
- » Increasing the number of reporting entities in the IT-supported reporting system
- » Continuing the quality inspection started in the previous fiscal year and successively implementing the improvement catalogue regarding control concept and design
- » Intensifying effectiveness monitoring.

As with the RMS, Internal Audit oversees the ongoing assessment of ICS effectiveness and reports their audit results directly to the Executive Board.

The Executive Board and the Supervisory Board's Audit Committee regularly discussed the ICS as well. The topics addressed included difficulties switching an IT system and issues with the precision of inventory management during the year.

The Executive Board is not aware of any matters indicating that the ICS is not appropriate or effective in any material respects. Nevertheless, an ICS — regardless of its design — cannot provide absolute security.