

REFINER COMPLIANCE REPORT GOLD

ASSESSMENT INFORMATION	
Refiner Name:	Aurubis AG
Refiner Location:	Hovestr. 50, 20539 Hamburg
Refiner Contact Person:	
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Assessment Period	01.10.2022 – 30.09.2023
Lead auditor and audit team members	Susanne Günzerodt (LA) Dr. Tahsin Choudhury Dr. Hanspeter Tomschi
Date of this report	26.02.24

Aurubis' evaluation

Step 1: Company management systems
Compliance statement with requirement: We have fully complied with step 1 and established a strong management system.
Has the Refiner adopted a supply chain policy regarding due diligence for supply chains of gold? At the beginning of the reporting year, a gold supply management policy was in place and put into effect, which is in consistence with the model set out in the Annex II of the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk-Areas. In view of increased regulatory requirements (German Supply Chain Due Diligence Act, Gold Guidance version 9) Aurubis has decided to revise its Responsible Sourcing framework and valid from 1st of October 2022 (updated August 1st, 2023) a new Corporate Responsible Sourcing Policy was put in place and into effect. The Policy includes the "LBMA Gold and Silver Supply Management, and EU-Conflict Minerals Regulation Sub-policy" in Annex 2. We also introduced a new business partner screening process which combines supplier self-assessment and external data sources including ESG scores for an enhanced due diligence. Our Corporate Responsible Sourcing Policy together with our internal business partner screening process description define the establishment of the management system and within that our responsibility for conducting risk-based due diligence, screening and monitoring of transactions and governance structures. Aurubis aims at preventing or mitigating all human rights and ESG risks identified or referred to in i.a. the Annex II of the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk-Areas, the Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc of The Copper Mark, the EU Conflict Minerals Regulation 2017/821, the LBMA Responsible Gold and Silver Guidance, the Responsible Minerals Assurance Process (RMAP) Tin and Tantalum Standard, and the German Supply Chain Due Diligence Law (LkSG).

Has the Refiner set up an internal management structure to support supply chain due diligence?

The internal management system based on above policies is set up to define the governance, roles and responsibilities, internal audit, communication and senior management review.

The Specific Supply Chain Concentrates Responsible (SCR) and the Specific Supply Chain Recycling Responsible (SRR) are responsible for the execution and implementation of the Gold and Silver Supply Management Sub-Policy and report directly to the Board.

Has the Refiner established a strong internal system of due diligence, controls and transparency over gold supply chains, including traceability and identification of other supply chain actors?

Each delivery is registered in SAP system and all relevant information like shipping documents, weight receipts, assays or settlements are centrally stored. All relevant documents are digitized and stored safely. The release for treatment of the lot is done only when all this information is available.

Respect for human rights and the environment has the highest priority for Aurubis in its business activities. Therefore, authority and accountability for the effective oversight of the implementation and continuous improvement of the Supply Chain Due Diligence Program is assigned to the Executive Board of Aurubis. In order to fulfil this task, the Board appoints a committee consisting of senior managers from the following departments: Commercial, Corporate Procurement, Corporate Energy & Climate Affairs, Corporate Sustainability & External Affairs, Compliance, Corporate Environmental Protection and Corporate Occupational Health and Safety (OHS). This Supply Chain Committee also fulfils the duties of the Human Rights Officer and ensures an annually risk analysis with regard to human rights and environmental risks in the supply chain according to the German Supply Chain Due Diligence Law.

Has the Refiner strengthened company engagement with gold supplying counterparties, and where possible, assisted gold supplying counterparties in building due diligence capabilities?

We have implemented a business partner code of conduct that contains the requirements for our supply chain in alignment with the OECD guidelines and we require our business partners to accept our business partner code of conduct and conclude contractual agreements in that regard. Where necessary and appropriate we engage in discussions with our supply chain to discuss and obtain more detailed information and discuss required changes.

Has the Refiner established a company-wide communication mechanism to promote broad-based employee participation and risk identification to management?

All employees active in the procurement of relevant raw materials have received a dedicated training. In addition, more details are made available on our intranet and public internet approach. Aurubis has also developed a grievance mechanism allowing employees and external stakeholder to voice concerns over the gold supply chain or a newly identified risk. All commercial employees can raise concerns to the Specific Supply Chain Responsibles and/or the Chief Compliance Officer. A groupwide and public whistleblower hotline has been established, which is reviewed by corporate compliance. The whistleblower-hotline can be contacted around the clock by telephone, web form, e-mail or fax to report indications of possible concerns in the gold and silver supply chain. The whistle-blower hotline is available in 14 different languages.
<https://www.aurubis.com/en/Responsibility/whistleblower-hotline>

Step 2: Risk identification and assessment

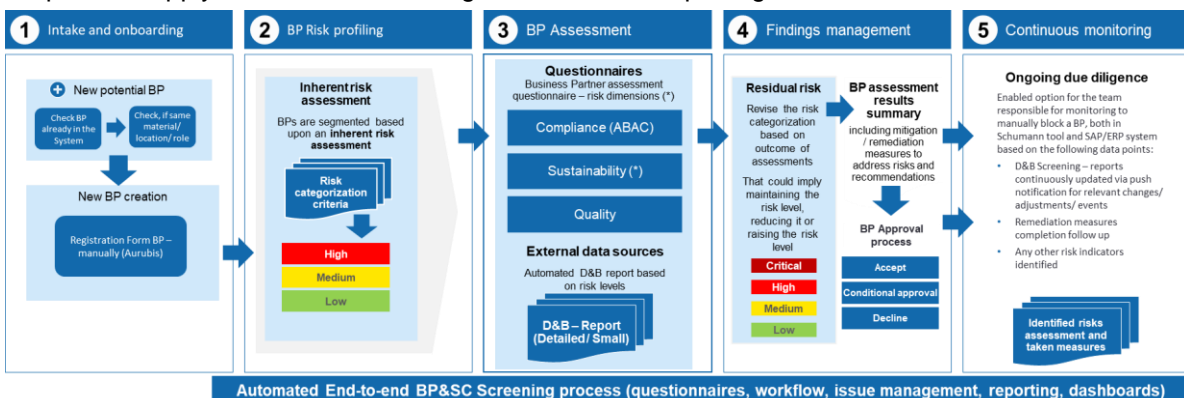
Compliance statement with requirement:

We have fully complied with step 2 and have identified and assessed risks in the supply chain.

Does the refiner have a process to identify risks in the supply chain?

A Risk Identification and Risk Management Process is in place and described in detail in our Responsible Sourcing Policy (under 4.2.)

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



The due diligence described above is carried out before entering new business relationships. The relevant due diligence checks, and investigations are repeated during the business relationship at intervals corresponding with the individual risk or whenever changes regarding the risk of e.g., human rights violations or ESG offences become known.

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

Does the Refiner assess risks in light of the standards of their due diligence system?

Supply chain due diligence is detailed in our Responsible Sourcing Policy and comprising all measures required by the LBMA Responsible Gold Guidance is performed before entering into a business relationship with any gold supplying counterpart. Aurubis performs enhanced due diligence for higher-risk categories, which includes (if applicable) those where gold originates from or transits via a conflict-affected or human rights abuse high-risk area. In addition, Aurubis conducts appropriate scrutiny and monitoring of transactions undertaken through the course of the relationship.

Does the Refiner report risk assessment to the designated manager?

Aurubis' Specific Supply Chain Responsibilities (SSCR) receive reports from designated representatives from Primary Raw Materials and Recycling Raw Materials departments on a regular basis to support them in their duties. The SSCRs themselves report in their function a review report

directly to the board. Senior Management must approve all new suppliers and retain the ultimate control and responsibility for the decision to start or continue a business relationship.

Step 3: Risk Management

Compliance statement with requirement:

We have fully complied with step 3 and designed and implemented a management system to respond to identified risks.

Has the refiner reported supply chain risks to senior management and devised a strategy for risk management of an identified risk by either (i) mitigation of the risk while continuing to trade, (ii) mitigation of the risk while suspending trade or (iii) disengagement from the risk?

Aurubis' SSCRs report in their function a review report directly to the board.

Our risk identification and risk management process to display, prevent, or mitigate ESG impacts is described in detail in our Corporate Responsible Sourcing Policy. Our Responsible Sourcing Policy also describes how to deal with potentially identified risks. When such risks are identified Aurubis will engage with its suppliers, relevant authorities, international organizations, civil society, and affected third parties, as appropriate, to improve and track performance with a view to prevent or mitigate these risks within the supply chain. Aurubis will not start or continue engagement with upstream suppliers after failed attempts at mitigation for any of these risks. In case business relation is terminated the business partner is banned in SAP and the IT tool for business partner screening.

Where a management strategy of risk mitigation is undertaken, it should include measureable steps to be taken and achieved, monitoring of performance, periodic reassessment of risk and regular reporting to designated senior management.

The business partner screening tool requires for higher risk counterparts conditions to be fulfilled resulting in a reassessment. The individual measures are defined and logged in the system, where required agreed with senior management.

Step 4: Independent third-party audit

Compliance statement with requirement:

We have fully complied with step 4 and arranged for an independent third-party audit of the supply chain due diligence.

Aurubis engaged the services of TÜV NORD CERT GmbH to audit the gold supply risk according to LBMA requirements and the report is publicly available. The audit for the current fiscal year is planned for November / December 2024.

Step 5: Report on supply chain due diligence

Compliance statement with requirement:

We have fully complied with step 5 and reported on supply chain due diligence.

Further information on our systems, targets and fulfillments with regards to our supply chain can be found in the annual report and specifically the nonfinancial report and on our company website at <https://www.aurubis.com/en/investor-relations/publications>

Aurubis' overall conclusion

Management conclusion

Is the Refiner in compliance with the requirements of the LBMA Responsible Gold Guidance for the reporting period?

Yes, in conclusion, Aurubis implemented effective management systems, procedures, processes and practices to conform to the requirements of the LBMA Responsible Gold Guidance, as above explained for the reporting year ended 30 September 2023.

Aurubis is committed to continuous improvement, and any corrective actions identified will be monitored internally on a regular basis.

Aurubis AG



Martin Sjöberg

Senior Vice President Commercial
Specific Supply Chain Concentrate Responsible



Hannu Heiskanen

Vice President MMR
Specific Supply Chain Recycling Responsible