

# (Group) Sustainability Statement

This statement provides an overview of our sustainability policies and actions. Since we operate as an energy-intensive company in the basic materials industry with a particular focus on the circular economy, topics such as decarbonization, recycling, occupational health and safety, environmental protection, responsible supply chains and compliance are especially important. The impacts, risks and opportunities arising from our operations, along with the corresponding policies, actions, targets and metrics, are detailed in this statement.

## Index of disclosure requirements according to ESRS

Disclosure requirement	Page
<b>ESRS 2 General Principles<sup>1</sup></b>	
BP-1 General basis for preparation of the sustainability statement	114
BP-2 Disclosures in relation to specific circumstances	114
GOV-1 The role of the administrative, management and supervisory bodies	17 <sup>2</sup> 116
GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	116
GOV-3 Integration of sustainability-related performance in incentive schemes	116
GOV-4 Statement on due diligence	117
GOV-5 Risk management and internal controls over sustainability reporting	117
SBM-1 Strategy, business model and value chain	60 <sup>2</sup> 118
SBM-2 Interests and views of stakeholders	119
SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	120
IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities	120
IRO-2 Disclosure requirements in ESRS covered by the undertaking's sustainability statement	121

Disclosure requirement	Page
<b>Environmental standards</b>	
<b>ESRS E1 Climate change</b>	
GOV-3 Integration of sustainability-related performance in incentive schemes	116
E1-1 Transition plan for climate change mitigation	131
SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	120
IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities	120
E1-2 Policies related to climate change mitigation and adaptation	133
E1-3 Actions and resources in relation to climate change policies	133
E1-4 Targets related to climate change mitigation and adaptation	136
E1-5 Energy consumption and mix	138
E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions	148
<b>ESRS E2 Pollution</b>	
IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities	120
E2-1 Policies related to pollution	141
E2-2 Actions and resources related to pollution	142
E2-3 Targets related to pollution	151
E2-4 Pollution of air, water and soil	144
<b>ESRS E3 Water and marine resources</b>	
IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities	120
E3-1 Policies related to water and marine resources	145
E3-2 Actions and resources related to water and marine resources	145
E3-3 Targets related to water and marine resources	145
<b>ESRS E4 Biodiversity and ecosystems</b>	
E4-1 Transition plan and consideration of biodiversity and ecosystems in strategy and business model	146
SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	120

Disclosure requirement		Page
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	120
E4-2	Policies related to biodiversity and ecosystems	146
E4-3	Actions and resources related to biodiversity and ecosystems	146
E4-4	Targets related to biodiversity and ecosystems	146
<b>ESRS E5</b>	<b>Resource use and circular economy</b>	
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	120
E5-1	Policies related to resource use and circular economy	147
E5-2	Actions and resources related to resource use and circular economy	148
E5-3	Targets related to resource use and circular economy	148
E5-4	Resource inflows	149
E5-5	Resource outflows	150
<b>Social standards</b>		
<b>ESRS S1</b>	<b>Own workforce</b>	
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	120
S1-1	Policies related to own workforce	151
S1-2	Processes for engaging with own workers and workers' representatives about impacts	152
S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	152
S1-4	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	153
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	162
S1-6	Characteristics of the undertaking's employees	60 <sup>2</sup> 156
S1-8	Collective bargaining coverage and social dialogue	157
S1-9	Diversity metrics	158

Disclosure requirement		Page
S1-10	Adequate wages	158
S1-13	Training and skills development metrics	158
S1-14	Health and safety metrics	159
S1-17	Incidents, complaints and severe human rights impacts	159
<b>ESRS S2</b>	<b>Workers in the value chain</b>	
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	120
S2-1	Policies related to value chain workers	160
S2-2	Processes for engaging with value chain workers about impacts	161
S2-3	Processes to remediate negative impacts and channels for value chain workers to raise concerns	161
S2-4	Taking action on material impacts on value chain workers, and approaches to mitigating material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions	162
S2-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	162
<b>ESRS S3</b>	<b>Affected communities</b>	
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	120
S3-1	Policies related to affected communities	164
S3-2	Processes for engaging with affected communities about impacts	164
S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns	165
S3-4	Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions and approaches	165
S3-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	166
<b>Governance standards</b>		
<b>ESRS G1</b>	<b>Governance</b>	
GOV-1	The role of the administrative, management and supervisory bodies	116
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	120

Disclosure requirement		Page
G1-1	Corporate culture and business conduct policies	167
G1-2	Management of relationships with suppliers	167
G1-3	Prevention and detection of corruption and bribery	169
Entity-specific	IT & cybersecurity	170

<sup>1</sup> MDR disclosures are covered in the relevant topic sections.

<sup>2</sup> Reference to a section outside of the Sustainability Statement. The concrete data points fulfilled outside of the Sustainability Statement are listed in [BP-2](#).

## BP – General basis for preparation

### BP-1 – General basis for preparation of the sustainability statement

With the following (Group) Sustainability Statement (subsequently also referred to as the “Sustainability Statement”), Aurubis AG fulfills its legal obligation to disclose non-financial information for the Aurubis Group and Aurubis AG for fiscal year 2024/25. This obligation arises from Sections 289c and 289e, and Section 315c in conjunction with Sections 289b to 289e of the German Commercial Code (HGB). The Sustainability Statement was also prepared to meet the requirements of Directive (EU) 2022/2464 of the European Parliament and Council of 14 December 2022 (Corporate Sustainability Reporting Directive, CSRD), Article 8 of Regulation (EU) 2020/852, as well as Sections 315b and 315c of the German Commercial Code (HGB), as part of a non-financial Group statement. The reporting for the Group is carried out voluntarily in accordance with the European Sustainability Reporting Standards (ESRS).

In addition to the non-financial reporting for the Aurubis Group, the non-financial reporting for Aurubis AG is also included below. Aurubis AG is the parent company of the Aurubis Group and manages the Group’s activities. It operates a primary copper smelter at the site in Hamburg and a secondary copper smelter at the site in Lünen. As such, in addition to holding activities in the Group, Aurubis AG is also responsible for the Group’s significant operating activities. Subsequently, the non-financial aspects of Aurubis AG are essentially shaped by the same circumstances as those of the entire Aurubis Group. The policies and actions described apply to both the Aurubis Group and Aurubis AG equally. Consequently, all the statements in the Sustainability Statement are valid for both the Aurubis Group and Aurubis AG.

### Reconciliation of aspects required under Section 289c (2) in conjunction with (3) of the German Commercial Code (HGB) related to reporting content pursuant to ESRS

Aspects	Topics pursuant to ESRS
Environmental matters	E1 – Climate change E2 – Pollution E3 – Water and marine resources E4 – Biodiversity and ecosystems E5 – Resource use and circular economy
Employee matters	S1 – Own workforce
Social matters	S3 – Affected communities
Respect for human rights	S1 – Own workforce S2 – Workers in the value chain S3 – Affected communities
Countering corruption and bribery	G1 – Business conduct
Additional key aspects	IT & cybersecurity

This Sustainability Statement for fiscal year 2024/25 was prepared on a consolidated basis. The scope of reporting corresponds to that of the consolidated financial statements. This Sustainability Statement covers the upstream and downstream value chain, as described in [9 SBM-1](#). This value chain was considered in our materiality analysis in order to identify material impacts, risks and opportunities. Detailed descriptions of specific policies, actions, metrics and targets are available in each respective section of this statement.

The option to not disclose relevant information on intellectual property, know-how or the results of innovation in accordance with ESRS 1 Section 7.7 was not exercised in the preparation of this report.

### BP-2 – Disclosures in relation to specific circumstances

#### Time horizons

The time horizons are consistent with the time horizons used in the financial statements and correspond to the definition in ESRS 1 Section 6.4. We define short-term time horizons as up to one year, medium-term time horizons as one to five years, and long-term time horizons as more than five years.

### Value chain estimation

Metrics for Scope 3 emissions are based on indirect sources such as sector averages or approximations. We explain the underlying methodology, the degree of accuracy and the actions planned to improve data quality in accordance with ESRS 1, Section 5 in [Q E1-6](#).

### Sources of estimation and outcome uncertainty

In topical standard [Q E1-1](#), we report financial figures that lie in the future and are therefore subject to uncertainty.

We use estimates for specific metrics in topical standards [Q E2-4](#) and [Q E1-6](#). These concern diffuse emissions to air under [Q E2-4](#) and process emissions as part of Scope 1 under [Q E1-6](#) on a fiscal-year basis. We describe the methods used and all the adjustments planned for the following reporting year in the topical standards.

### Changes in the preparation or presentation of sustainability information

The preparation and presentation of sustainability information was revised in order to meet the new CSRD and ESRS requirements. Key changes include adapting the Sustainability Statement format and revising reported content. The metrics disclosed have been revised where necessary to ensure alignment with legal definitions. During the transition to the new framework, the reporting continuity of the [Q S1](#) metrics was interrupted, so these cannot be directly compared with previous years' figures; no retroactive adjustment was undertaken. The methodology for the recycling rates in [Q E5-4](#) was amended, which limits comparison with the previous years here as well. We explain the respective amendments in the "Methods and significant assumptions" paragraph in the corresponding sections.

Furthermore, previously reported metrics that were not linked to CSRD and ESRS disclosure requirements have been removed. In January 2026, the metrics will be published in the Aurubis ESG Factbook, a separate document that will be released on our website for the first time for the 2024/25 fiscal year, replacing the previous KPI Update and the Sustainability Report. For comprehensive environmental reporting aligned with the calendar year, please refer to our Environmental Report.

### Reporting errors in prior periods

Since this is our first Sustainability Statement prepared in accordance with the European Sustainability Reporting Standards (ESRS), there is no prior report requiring correction.

### Disclosures stemming from other legislation or generally accepted sustainability reporting pronouncements

We have included information stemming from additional reporting standards in our Sustainability Statement. For a complete table of disclosure requirements derived from other EU legislation (see ESRS 2 Appendix B) and their classification under the corresponding data points, please refer to [Q Appendix 1](#) in the appendices for this Sustainability Statement.

### Incorporation of information by reference

We have fulfilled disclosure requirements with references to sections outside of the Sustainability Statement. This applies to the the following data points.

- » ESRS 2 GOV-1\_21a: [Q page 18, page 24](#)
- » ESRS 2 GOV-1\_21b: [Q page 24](#)
- » ESRS 2 GOV-1\_21d: [Q page 19, page 25](#)
- » ESRS 2 GOV-1\_21e: [Q page 25](#)
- » ESRS 2 GOV-1\_23a: [Q page 24](#)
- » ESRS 2 SBM-1\_40aiii, S1-6\_50f: [Q page 60](#)

The information incorporated in the Management Report by reference is clearly indicated as a separate informational element with a footnote that includes a reference to the corresponding disclosure requirement.

### Use of phase-in provisions for disclosure requirements in accordance with ESRS 1 Appendix C

We focused on the ESRS disclosure requirements for the first year and used the transitional provisions described in Appendix C of ESRS 1 to ensure the robust and effective implementation of the reporting requirements. [Q Appendix 1](#) provides an overview of the material (sub-)topics that are affected by the transitional provisions. In particular, we used the one-year transitional provision for reporting on anticipated financial effects related to material environmental topics (ESRS E1-9) and the one-year transitional provision for material social (sub-)topics. Because professional development metrics are part of our 2030 sustainability targets, we disclose them under S1-13 although this disclosure requirement is subject to a transitional provision.

## GOV – Governance

Our corporate governance system is defined by responsible and sustainable corporate governance and oversight practices. Our sustainability reporting is integrated into the corporate governance structure.

### GOV-1 – The role of the administrative, management and supervisory bodies

The roles and responsibilities of the management and supervisory bodies are comprehensively described in [Annual Report, Report and declaration on corporate governance](#). This includes disclosing skills and knowledge related to the “environmental, social and corporate governance (ESG)” skill areas.

We update our double materiality assessment annually and identify sustainability impacts, risks and opportunities (IROs) related to environmental, social and governance topics. The materiality analysis is approved by the Executive Board and submitted to the Supervisory Board.

The Executive Board is responsible for monitoring, managing and controlling sustainability-related impacts, risks and opportunities across all three ESG dimensions. The Supervisory Board is responsible for supervising the Executive Board, and the Audit Committee has a central role in monitoring the sustainability reporting process. The Executive Board has delegated the monitoring, management and control of impacts, risks and opportunities to the respective corporate functions and plant managers. The Executive Board also monitors the setting of targets related to material impacts, risks and opportunities and the progress made toward achieving these targets by discussing the degree of target achievement at least once a year during the Executive Board meetings.

In the 2024/25 fiscal year, a workshop was conducted to expand the Supervisory Board and Executive Board’s specific expertise regarding the ESRS and the IROs. These topics were also addressed as a regular agenda item in the meetings of the Executive Board and Audit Committee to enable a continuous dialogue.

### GOV-2 – Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies

The Corporate Sustainability division and the relevant corporate functions inform the Executive Board and Supervisory Board, including its relevant committees, about material impacts, risks and opportunities, the implementation of due diligence processes, and the results and effectiveness of policies, actions, metrics and targets adopted to address them.

The Corporate Sustainability division, which reports directly to the CEO’s operational division, supports the development and implementation of our strategic sustainability priorities. These are embedded in our 2030 sustainability targets and as such part of our corporate strategy. The responsible corporate functions and cross-functional teams address various sustainability topics, implement roadmaps, and integrate sustainability obligations into our business activities. They all also report to the Executive Board and the Supervisory Board. Topics such as the environment, health and safety, and diversity are regularly addressed in Executive and Supervisory Board meetings.

The Executive Board is briefed during board meetings and at additional meetings when necessary. This regular reporting ensures that all management levels are kept up to date on relevant sustainability matters, enabling them to make informed decisions and strategically adjust the corporate strategy. The Supervisory Board is informed about material IROs once the annual double materiality assessment has been completed. The Supervisory Board’s Audit Committee is briefed on relevant sustainability topics, including IROs, due diligence obligations, and the results and effectiveness of policies and targets on a quarterly basis.

### GOV-3 – Integration of sustainability-related performance in incentive schemes

Our Executive Board compensation system integrates sustainability matters. Sustainability target achievement (ESG targets) is weighted at 10 % of annual variable compensation, which accounts for 20–25 % of total annual compensation. The Supervisory Board sets the targets for each fiscal year, and these may also include climate-related topics. Climate-related topics were not included for the 2024/25 fiscal year. The target is worded as: “Develop appropriate CSRD reporting and further improve the Internal Control System (ICS).” Due to the occurrence of a fatal accident [S1-14](#), ESG target achievement was set to

“not achieved” in accordance with the Supervisory Board’s guidelines. For additional information, including performance evaluation criteria, the metrics used and their alignment with sustainability targets, as well as details on the degree of target achievement, please refer to [Q Annual Report, Compensation Report for the Executive Board and the Supervisory Board of Aurubis AG](#).<sup>1</sup>

Our compliance with disclosure requirements is in line with the compensation report pursuant to Articles 9.1 and 9.2 of Directive 2007/36/EC on the exercise of certain shareholder rights with listed companies.

### GOV-4 — Statement on due diligence

We accounted for the required due diligence obligations in preparing our Sustainability Statement. This represents the process for identifying how negative impacts on the environment and people can be prevented and mitigated. We took the core elements of due diligence into account as part of this process.

#### Mapping of the main aspects and steps of the due diligence process in the Sustainability Statement

Core elements of due diligence	Paragraphs in the Sustainability Statement
a) Embedding due diligence in governance, strategy and business model	GOV-1, GOV-2, GOV-3, GOV-5
b) Engaging with affected stakeholders in all key steps of the due diligence	GOV-2, SBM-2, IRO-1, S1-2, S1-3, S2-2, S2-3, G1-1
c) Identifying and assessing negative impacts	IRO-1, SBM-3
d) Taking actions to address these negative impacts	E1-3, E2-2, E3-2, E4-3, E5-2, S1-4, S2-4, S3-4, G1-3
e) Tracking the effectiveness of these efforts and communication	Topical information on metrics and targets

<sup>1</sup> The auditor conducted a formal, though not a content-related, audit of the section referenced.

### GOV-5 — Risk management and internal controls over sustainability reporting

Risk management and the ICS for the sustainability reporting process are partially integrated into the ICS and RMS, which are described in the [Q Combined Management Report, Risk and Opportunity Report](#).

As part of the double materiality assessment conducted for the 2024/25 fiscal year, sustainability risks from the RMS risk catalogue were assigned to the relevant topics [Q IRO-1](#). In addition to the process described in the Risk and Opportunity Report, which includes risks with an operational planning time horizon, there is also a risk reporting process that captures and evaluates strategic risks with a time horizon of more than three years. These risks also served as a basis for the materiality analysis.

In reporting year 2024/25, Aurubis accelerated the development of the ICS for non-financial metrics. It has already been partially incorporated into the existing ICS with full integration planned for the coming fiscal years. The risk assessment process was systematically expanded to include risks related to sustainability reporting, including the risk of inaccurate corporate reporting, as well as risks related to material non-financial metrics derived from the 2030 sustainability targets. Based on this risk analysis, controls were either assigned or newly defined where none existed.

These controls were initially implemented at the consolidated Group level during the reporting period. In the coming fiscal years, the sustainability reporting control catalogue will be gradually expanded, rolled out at the site and plant levels, and formalized. There are also plans to intensify control effectiveness monitoring.

The relevant corporate functions and ultimately the Executive Board are responsible for the adequacy and effectiveness of controls over sustainability reporting and the associated metrics.

## SBM — Strategy

### SBM-1 — Strategy, business model and value chain

Aurubis is a company in the basic materials industry that operates worldwide. The company focuses on copper and other metals. The business model includes the processing of complex metal concentrates and scrap metals along with organic and inorganic recycling materials and industrial residues into copper cathodes and other products such as gold, silver, nickel and tin. Over 7,000 employees work at 16 sites, 15 in Europe and a recycling plant in the US. A breakdown of the number of employees by geographic region is detailed in [Q Combined Management Report, Sites and employees](#).

The value chain begins with the procurement of raw materials from various geographical regions, in particular from South American countries such as Chile, Peru and Brazil, but also from Europe and Turkey. Procurement is exclusively carried out through suppliers and intermediaries, since Aurubis does not operate its own mines. The transport and logistics chains are organized globally: Copper concentrates are primarily transported by sea to transshipment ports like Brunsbüttel (Germany) and Burgas (Bulgaria), while most recycling material reaches the European and North American sites by land.

Other services such as energy supply, transport and technical equipment are also part of the value chain. Fluctuations in metal and energy prices and in the US dollar exchange rate are hedged as part of our hedging strategy to minimize risks along the value chain.

Operating activities are divided into the Custom Smelting & Products segments, which processes primary materials, and the Multimetal Recycling segment, which uses secondary raw materials. Aurubis applies a closing-the-loop approach, which involves returning copper scrap, metal-containing stamping waste, alloyed scrap and industrial residues from industry back into the production cycle. The production steps in the two segments are identical starting with metal refining and further processing, and the final products therefore fulfill the same standards regardless of the raw material source.

Aurubis competes with international primary smelters, particularly in China and Japan, and with other metal processors in the recycling sector.

Aurubis supplies business customers from a range of sectors, including the automotive, construction, chemical, telecommunications and bank sectors, the copper semis industry, the cable and wire industry, renewable energy, defense and security. Aurubis operates exclusively in the business-to-business sector and supplies products that are further processed in a wide range of industrial sectors. By-products like sulfuric acid, iron silicate and synthetic minerals are sold to international customers from the chemical, fertilizer and metal processing industries. For more information about our products and services, as well as the markets and customers we serve, please refer to [Q Combined Management Report, Business model of the Group](#). Aurubis does not manufacture products for activities in the coal, oil and gas, controversial weapons, or tobacco sectors, nor does it provide services in these areas.

Since we are required to provide segment reporting, we align the breakdown of total revenue with the relevant IFRS 8 information in [Q Combined Management Report, Business performance in the segments](#). We are not engaged in chemicals production as defined in Division 20.2 of Annex I to Regulation (EC) No 1893/2006.

Our corporate strategy serves both as an economic framework and as a catalyst for cultural development. Sustainability is one of the foundational pillars of our corporate strategy, making it a key component. We pursue the company's mission of responsibly transforming raw materials into value — with metals for an innovative and sustainable world. The 2030 sustainability targets define the key action areas, targets and action plans for the coming years. They are a component of the Aurubis corporate strategy and are divided into the focus areas People, Environment and Economy. The strategy including the sustainability targets was adopted by the Executive Board and the Supervisory Board in fiscal year 2020/21 and updated in fiscal year 2024/25. Sustainability continues to be a key guiding principle embedded in the 2030 targets.

This report systematically outlines the relevant 2030 sustainability targets in the corresponding topical standards according to ESRS, thus creating a clear framework for understanding our targets. The different sections also provide information about the implementation status of these targets, highlighting our progress.

## SBM-2 — Interests and views of stakeholders

We engage with our key stakeholders on sustainability topics and attach great importance to open and transparent dialogue.

Our key stakeholders include:

- » **Employees (works councils and labor unions):** We prioritize communication with employees and ensure they are informed about company objectives, changes and successes, while also incorporating their ideas and concerns. This is accomplished through regular meetings organized by works councils and labor unions, newsletters, employee magazines, and feedback mechanisms.
- » **Customers:** Our business units' sales teams actively maintain contact with customers and foster collaborative relationships. They focus on understanding customer needs and on eliciting feedback with periodic satisfaction surveys. They showcase their product portfolios at trade fairs, increasing visibility and gaining valuable insights directly from the market. They are committed to providing sustainable and high-quality material solutions that meet our customers' evolving needs. Sustainability information is regularly exchanged through questionnaires and at meetings.
- » **Suppliers and contractors:** Aurubis places great importance on maintaining open communication channels and fostering collaborative relationships with its suppliers, both on-site and off-site. By establishing clear and consistent lines of communication, we facilitate ongoing dialogue that keeps both parties informed and up to date. This includes ESG dialogues, cooperation agreements, and memoranda of understanding (MoUs) [Q G1-2](#) as well as events such as Supplier Days [Q S1-4](#).
- » **Authorities and regulators:** The External Affairs department coordinates interactions with public authorities and regulatory bodies at Aurubis. It works closely with experts to ensure effective collaboration with industry associations. This includes directly participating in political dialogues and contributing to public consultations. Aurubis leverages its knowledge to actively advocate for regulatory frameworks that support long-term innovation and sustainability in the sector, especially in areas such as energy, the circular economy, and resource security.

- » **Local communities:** At Aurubis, the respective site management teams are tasked with engaging with local communities and municipalities. We exchange ideas with them through formats like meetings, forums and events. We champion the positive development of neighboring communities around our sites by promoting projects that align with the criteria outlined in our Social Engagement Policy [Q S3-4](#). Involving local communities is especially relevant in the mining sector. For mines operated by our direct suppliers, we assess community engagement as part of our Business Partner Screening process [Q G1-2](#).
- » **Capital market participants:** Aurubis' Investor Relations department facilitates stakeholder dialogue through various channels, including capital market conferences, roadshows, face-to-face meetings, and at events like conference calls on quarterly releases and the Annual General Meeting. The IR team promotes direct communication and shares information through press releases and other publications that reflect the company's latest developments. These interactions primarily aim to promote transparency, solicit valuable feedback on capital market strategic priorities, and align financial targets with ESG targets (environmental, social and governance).
- » **Non-governmental organizations:** Aurubis is represented on the Copper Mark Advisory Council and actively participates in dialogue to encourage sustainable production practices in the non-ferrous metals industry. We are part of the Automotive Industry Dialogue and its Copper Working Group, a German multi-stakeholder initiative to advance human rights due diligence in the automotive supply chain. Aurubis is also a member of the UN Global Compact Network Germany and the UN Global Compact Network Bulgaria.

We integrate the interests and perspectives of our key stakeholders into our strategy and business model through the double materiality assessment (see [Q IRO-1](#)). Stakeholder interests and perspectives are communicated to the Executive Board and Supervisory Board through established channels such as the whistleblowing system, risk assessments, the double materiality assessment, and one-on-one conversations. The Executive Board evaluates the strategic relevance of stakeholder concerns and ensures alignment with regulatory obligations and strategic priorities. This process enables the integration of stakeholder input into company decisions, balancing stakeholder concerns with compliance and strategic direction. By systematically evaluating these inputs, the governing bodies work to align stakeholder interests with company objectives and regulatory requirements.

## SBM-3 — Material impacts, risks and opportunities and their interaction with strategy and business model

Aurubis conducted a comprehensive materiality assessment to identify its most significant impacts, risks and opportunities. We revised our assessment methodology from previous years to align with the double materiality approach requirements defined in the ESRS. The detailed double materiality assessment (DMA) process is described in [IRO-1](#).

At the beginning of each material topical standard, we provide detailed descriptions of the identified impacts, risks and opportunities (IROs), including their specific location in the value chain and the most relevant time horizon. This includes the policies, actions, targets and metrics we defined to effectively manage these IROs.

The current and anticipated financial effects of our material risks and opportunities are comprehensively explained in the [Combined Management Report, Risk and Opportunity Report](#).

## IRO — Impact, risk and opportunity management

### IRO-1 — Description of the processes to identify and assess material impacts, risks and opportunities

Aurubis conducted a double materiality assessment (DMA) to identify and assess potential and actual impacts on people and the environment along with financial risks and opportunities (IROs). This process was aligned with ESRS requirements starting with the 2024/25 fiscal year. We also ensure conformity with our risk management system. Sustainability-related risks are part of our risk management system, see [GOV-5](#).

The DMA results are validated annually and a comprehensive DMA process is conducted every three years. This ensures that the assessment is still appropriate and takes potential changes in the organizational structure as well as external factors into account. The respective departments are responsible for the material IROs.

### Identifying impacts, risks and opportunities

At the start of the comprehensive DMA process, a list of potential material sustainability matters is compiled. This list is based on the specifications outlined in ESRS 1 Appendix A AR 16 and is supplemented with additional topics from industry standards and previous assessments. Topic standard S4 — Consumers and end-users was immediately excluded during the preliminary assessment, as we identified it as not relevant for our undertaking. IROs are then identified for those topics that could be relevant in the context of our own activities and along our value chain. This includes the use of due diligence tools such as Business Partner Screening (BPS) and their results.

### Engaging with external stakeholders

Engaging external stakeholders is an essential part of the DMA process and contributes to a thorough assessment of the relevance of sustainability topics. We incorporate the sustainability matters mentioned above here. Aurubis selects stakeholders based on their interests and influence, ensuring a diversity of perspectives. This is done through online questionnaires, in interviews and by including non-financial reporting. As part of the DMA process for fiscal year 2024/25, an interview with an NGO active in nature conservation was conducted to incorporate the perspective of silent stakeholders. Communities near our two large Hamburg and Pirdop sites were involved as representative for the affected communities around our plants.

### Identifying and assessing material environmental IROs (E1-E5)

Climate-related impacts were identified and assessed as part of the overarching process. To identify and assess the physical risks, transition risks and opportunities associated with climate change, we conducted a climate scenario analysis that followed TCFD recommendations. The time horizons correspond to the definition in ESRS 1 Section 6.4. Two scenarios based on findings from the Intergovernmental Panel on Climate Change (IPCC) were considered: an optimistic 1.5°C scenario and a pessimistic >4°C scenario. The results are detailed in [E1-SMB-3](#). The scenario analysis is very long-term oriented and its results therefore go far beyond the assumptions used in financial planning.

To identify and assess material environmental impacts in line with the E-standards, we applied Commission Recommendation (EU) 2021/2279 [Q eur-lex.europa.eu/eli/reco/2021/2279/oj/eng](https://eur-lex.europa.eu/eli/reco/2021/2279/oj/eng). This recommendation outlines the use of the Environmental Footprint methods to measure and communicate the life cycle environmental performance of products and organizations. For environmental impacts related to metal extraction and processing, we referred to the sustainability assessment from the “Metals for Clean Energy: Pathways to solving Europe’s raw materials challenge” study carried out by KU Leuven [Q eurometaux.eu/media/jmxf2qm0/metals-for-clean-energy.pdf](https://eurometaux.eu/media/jmxf2qm0/metals-for-clean-energy.pdf) as well as the Organization Environmental Footprint (OEF) hot spot analysis [Q internationalcopper.org/resource/copperoefsr/](https://internationalcopper.org/resource/copperoefsr/). Additionally, the WWF Water Risk Filter [Q riskfilter.org/water](https://riskfilter.org/water) and the Aqueduct risk assessment tools from the World Resources Institute [Q www.wri.org/aqueduct](https://www.wri.org/aqueduct) were used for the water risk topic.<sup>2</sup> The environmental impacts of our operations on biodiversity are assessed during permitting procedures and in environmental impact assessments. Potentially relevant environmental impacts could arise from operating activities at our production sites. Some of these sites are located near nature conservation areas — such as Natura 2000 sites — though none are located directly in a protected area. The Hamburg site is the closest of the multimetal production sites, located a distance of approximately 200–600 meters from a protected area.

Every production site also undergoes regular environmental risk assessments, which include biodiversity. These assessments are conducted with the support of external experts and are updated regularly. The most recent update for all production sites majority-owned by Aurubis took place in 2023. In 2024, the assessment for all multimetal production sites was updated and expanded to include evaluating environmental risks related to climate change where various scenarios are considered. These environmental risk assessments serve as one of the foundations of our DMA. No material environmental impacts on nearby protected areas were identified.

### Assessment of impacts, risks and opportunities

In workshops with the corporate functions, each topic was assessed based on its actual or potential impacts on the environment and society, as well as its financial implications, i.e., risks and opportunities, according to the factors outlined in ESRS 1, sections 3.4 (45 and 46) and 3.5 (51). We consider our own activities and value chain, and include dependencies on natural, human and social resources (e.g., energy, infrastructure, concentrates and scrap, employees) to ensure a holistic perspective.

<sup>2</sup> The additional information provided online is voluntary and not included in the auditor’s scope.

The list of material IROs is validated annually by the Executive Board, reviewed by the Supervisory Board’s Audit Committee and submitted to the Supervisory Board.

### Communicating the results

Topics that cover at least one IRO and where the assessment exceeds a threshold defined by Aurubis — based on qualitative and quantitative factors in accordance with ESRS — are considered material. These topics form the basis for mandatory disclosures under the ESRS. Material topics are allocated to the ESRS disclosure requirements to ensure compliance with the ESRS. We disclose information on policies, actions, targets and metrics for each material topic directly in the topical standards. In this context, we refer to the upstream value chain as the supply chain in the topical standards.

### IRO-2 — Disclosure requirements in ESRS covered by the undertaking’s sustainability statement

In [Q Appendix 1](#) and [Q Index of disclosure requirements according to ESRS](#), we provide an overview of the ESRS disclosure requirements and indicate where the respective disclosure requirements can be found in the Sustainability Statement or other parts of the annual report.

Our sustainability reporting approach is based on a comprehensive double materiality assessment, see [Q IRO-1](#), which ensures that we focus on the material topics. The assessment concluded that topic standard S4 — Consumers and end-users is not relevant to us as a B2B company. At the same time, we identified IT & Cybersecurity as an entity-specific topic and report on it in accordance with the Minimum Disclosure Requirements (MDR).

Our policies — which include directives and commitments — cover various material sustainability topics, some of which are addressed across multiple topical ESRS standards. We have drafted our policies and commitments to align with internationally recognized standards such as the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. We have been a signatory of the United Nations Global Compact (UNGC) since 2014 and are committed to implementing its Ten

Principles related to human rights, labor, the environment and anti-corruption. Every year, we report our progress on implementing the Ten Principles to the UNGC.

The following table provides an overview of our policies and commitments and indicates the topic sections in which they are addressed.

**Policies and commitments related to the material topics**

Name	Key aspects	Scope	Responsibility	Standard referenced
Aurubis Code of Conduct	Defines our targets, values and ethical standards		Aurubis AG Executive Board	E1, E2, E5, S1, S3, G1
Corporate Sustainability Policy	Addresses improving sustainability governance with a focus on decarbonization, sustainability management and reporting, and responsible sourcing		Corporate Sustainability	E1, S2
Corporate Energy & Climate Policy	Addresses securing and optimizing the energy supply, CO <sub>2</sub> management, and energy management		Corporate Energy & Climate Affairs	E1
Aurubis Business Partner Code of Conduct	Defines and promotes core values and principles for a sustainable partnership with regard to environmental, social and governance standards, including disclosure of reporting channels		Aurubis AG Executive Board	S2
Corporate Occupational Health and Safety Policy	Prioritizes proactive safety measures, continuous improvements, and active employee engagement while ensuring strict compliance with legal requirements and company standards		Health & Safety	S1
Corporate Human Rights Policy	Addresses the identification, prevention and minimization of human rights and environmental violations		Corporate Sustainability	S1

Name	Key aspects	Scope	Responsibility	Standard referenced
Corporate Environmental Protection Policy	Defines the Group-wide framework for environmental management, responsibilities and the implementation of legal environmental requirements		Corporate Environmental Protection	E2, E3, E4, E5, S3
Future-Oriented Employer Commitment	Reflects Aurubis' commitment to creating a fair, safe and inclusive workplace by promoting stable employment, adequate compensation, flexible working conditions, and continuous skills development		Aurubis AG Executive Board	S1
Corporate Responsible Sourcing Policy	Aurubis' commitment to sustainable and ethical sourcing practices; emphasizes the importance of human rights, environmental protection and ethical conduct		Commercial; Recycling Raw Materials	E1, E2, E3, E4, E5, S2, S3, G1
Diversity Commitment	Emphasizes our strong commitment to fostering a diverse and inclusive workplace where all employees are respected and valued for their unique differences		Aurubis AG Executive Board	S1, G1
Aurubis AG Policy Statement on Respecting Human Rights and Environmental Obligations	Reaffirms Aurubis' commitment to upholding human rights and reducing environmental impact		Aurubis AG Executive Board	S2
Corporate Policy on Information Security	Defines scope, objectives, measures, responsibilities, obligations and processes related to information security		IT Security	Entity-specific
Corporate Policy on OT Security	Establishes binding technical and administrative guidelines for safeguarding production environment IT infrastructure		IT Security	Entity-specific
Social Engagement Policy	Emphasizes Aurubis' commitment to social responsibility by strengthening the company's engagement in both local and international communities		Corporate Communication & External Affairs	S3

Name	Key aspects	Scope	Responsibility	Standard referenced
Rules of Procedure for the Whistleblowing System	Establishes the procedure for reporting legal violations and assigns protecting whistleblowers the highest priority	◀ ▲ ▶	Compliance	G1, S1, S2, S3
Corporate Compliance Policy	Targets adherence to high compliance standards to prevent legal disputes, protect Aurubis' reputation, and ensure lawful conduct	◀ ▲ ▶	Compliance	G1
Corporate Anti-Corruption Compliance Policy	Emphasizes the zero-tolerance stance towards corruption and bribery and highlights compliance with legal standards to maintain fair competition and protect Aurubis' reputation	◀ ▲ ▶	Compliance	G1

◀ Upstream value chain ▲ Own operations ▶ Downstream value chain

## EU Taxonomy

### Background and targets

The European Union is committing to carbon neutrality by 2050. The EU Taxonomy (Regulation [EU] 2020/852 including the related delegated acts adopted as legally binding supplements to the Regulation) is a central element of the action plan for achieving this target. As a classification system for environmentally sustainable economic activities, it is designed to create transparency for investors and stakeholders, prevent greenwashing, and thus increasingly direct financial flows into sustainable projects. The EU Taxonomy comprises a total of six environmental objectives:

- » Climate change mitigation
- » Climate change adaptation
- » Sustainable use and protection of water and marine resources
- » Transition to a circular economy
- » Pollution prevention and control
- » Protection and restoration of biodiversity and ecosystems

Technical screening criteria for selected economic activities were published for the first two environmental objectives in June 2021. Technical screening criteria for the four remaining environmental objectives followed in 2023. These economic activities fall under the scope of the EU Taxonomy. They are considered taxonomy eligible. If these activities fulfill the technical screening criteria set out in the EU Taxonomy, they are considered taxonomy aligned.

According to the EU Taxonomy, an economic activity listed in the delegated acts can be classified as environmentally sustainable or taxonomy aligned if the following conditions are cumulatively met:

- » The economic activity substantially contributes to fulfilling an environmental objective (substantial contribution).
- » The economic activity does no significant harm to any of the other environmental objectives (do no significant harm).
- » Minimum standards regarding human rights including workers rights, bribery/corruption, taxes and fair competition are complied with (minimum safeguards).
- » The economic activity fulfills the technical screening criteria.

The Taxonomy has yet to address many activities at the time of the publication of this statement. While the EU included additional taxonomy-eligible economic activities with regard to the four remaining environmental objectives through the delegated act published in June 2023, this cannot yet guarantee overall coverage of economic activities for all reporting entities as it now stands.

Furthermore, the implementation of the EU Taxonomy in companies is accompanied by considerable uncertainties due to the dynamic development and expansion of the EU Taxonomy requirements, along with differing interpretations regarding the criteria and level of detail.

### Aurubis' economic activities

To assess taxonomy eligibility, Aurubis' activities are compared to the economic activities listed in the EU Taxonomy and as such defined as eligible. Aurubis' core activities are:

- » The processing and utilization of complex concentrates and recycling raw materials
- » The production of copper, copper products, and other non-ferrous metals and co-products

Not all economic activities are covered by the EU Taxonomy. Aurubis' core business is therefore not designated taxonomy eligible. This applies to all six environmental objectives. It is, however, possible that the European Commission might include our core activities as taxonomy eligible in the coming years. This would impact both the taxonomy-eligible and the taxonomy-aligned activities at Aurubis, particularly turnover, that would have to be reported.

Aurubis' product portfolio includes intermediate products for a wide range of solutions that enable the use of renewable energies, energy-efficient applications, and low-carbon mobility. Even though these intermediate products are not covered by the EU Taxonomy, Aurubis views them as important drivers of the energy transition and essential to achieving Europe's climate targets. Since the EU Taxonomy has thus far focused on economic activities that are not included in the Aurubis product portfolio, only supporting economic activities, and not those classified as belonging to the core business, are classified as taxonomy eligible.

### Taxonomy-eligible activities at Aurubis

An economic activity is taxonomy eligible if technical screening criteria have been described for it per delegated act. Whether the descriptions of the activities set out in the act apply to Aurubis' economic activity is specifically assessed. In addition to economic activities that could directly contribute to one of the six environmental objectives, the EU Taxonomy also defines enabling activities<sup>1</sup> that directly contribute to improving the carbon footprint or environmental performance of other activities, as well as transitional activities<sup>2</sup> for which no technically or economically feasible low-carbon alternatives currently exist, but which support the transition to a carbon-neutral world.

Checklist-based interviews were conducted with all fully consolidated subsidiaries to identify Aurubis' taxonomy-eligible activities. For fiscal year 2024/25, six EU Taxonomy activities from two different sectors were identified for Aurubis' economic activities and as such classified as taxonomy eligible:

Economic activity <sup>1</sup>		Description
CCM 6.5	Transport by motorbikes, passenger cars and light commercial vehicles	Purchase, financing, renting, leasing and operation of vehicles designated as category M1, N1 [...] or L (2- and 3-wheel vehicles and quadricycles)
CCM 7.1	Construction of new buildings	Development of building projects for residential and non-residential buildings by bringing together financial, technical and physical means to realize the building projects for later sale as well as the construction of complete residential or non-residential buildings, on own account for sale or on a fee or contract basis.
CCM 7.3	Installation, maintenance and repair of energy efficiency equipment	Individual renovation measures consisting in installation, maintenance or repair of energy efficiency equipment
CCM 7.4	Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)
CCM 7.6	Installation, maintenance and repair of renewable energy technologies	Installation, maintenance and repair of renewable energy technologies, on-site
CCM 7.7	Acquisition and ownership of buildings	Buying real estate and exercising ownership of that real estate.

<sup>1</sup> Unlike in the previous year, no activities that could be assigned to category 4.25 Production of heat/cool using waste heat took place in the 2024/25 fiscal year. The Industrial Heat project assigned to this category was completed in the previous year and in the current year has CapEx relevance only in the form of a BAFA subsidy amounting to €43.6 million. This does not constitute an eligible entry under the EU Taxonomy, and the corresponding amount of the subsidy is therefore not listed under activity 4.25. Activities 7.1 and 7.7 were newly included in the 2024/25 fiscal year, as the interpretation of the relevant delegated acts has evolved. Aurubis is thereby aligning itself with standard reporting practices.

Based on the activity descriptions and the technical screening criteria, Aurubis has assigned all the above-mentioned activities to the first environmental objective, "Climate change mitigation," since the focus of the activities identified is not on providing adaptation solutions to reduce climate risks. Furthermore, no relevant activities were assigned to the remaining four environmental objectives.

<sup>1</sup> Regulation (EU) 2020/852, Art. 16.

<sup>2</sup> Regulation (EU) 2020/852, Art. 10 (2).

Since Aurubis' core business and turnover-generating activities are currently not covered by the taxonomy, the above-mentioned activities essentially comprise the disclosure of taxonomy-eligible CapEx.

The expansion of a solar park in Pirdop, one of the largest captive solar parks for a company in Bulgaria, is a flagship project with taxonomy-eligible CapEx (7.6 Installation, maintenance and repair of renewable energy technologies).

Aurubis is also making taxonomy-eligible infrastructure investments in the construction or acquisition of buildings (7.1 Construction of new buildings and 7.7. Acquisition and ownership of buildings), in energy-efficient lighting and energy efficient equipment in buildings (7.3 Installation, maintenance and repair of energy efficiency equipment) and in charging infrastructure for electric vehicles (7.4 Installation, maintenance and repair of charging stations for electric vehicles in buildings).

### Technical screening criteria fulfillment at Aurubis

For the six taxonomy-eligible activities listed, the fulfillment of the technical screening criteria was assessed at the individual project level with the help of checklist-based interviews and with the cooperation of the company and project managers. The technical screening criteria were analyzed and interpreted, and the results documented and substantiated with the appropriate verification documents and calculations.

### Substantially contribute to climate change mitigation

Some of the activities relevant for Aurubis substantially contribute to climate change mitigation per se when being carried out (7.4, 7.6), while for other activities a high level of energy efficiency would have to be ensured for them to substantially contribute to climate change mitigation (7.1, 7.3, 7.7). "Transport" activities fulfill the substantial contribution criterion if they result in low or no CO<sub>2</sub> emissions (6.5).

Aurubis fulfills the substantial contribution criterion for only a very small part of the taxonomy-eligible projects.

### Do no significant harm to the other environmental objectives

The second step is to ensure that in carrying out the activity, Aurubis does no significant harm to the other environmental objectives. With regard to the second environmental objective "Climate change adaptation"

in particular, an analysis of the physical climate risks is to be carried out for all activities listed in Annex A of the EU Taxonomy delegated act. This assessment was centrally carried out at the Group level in cooperation with Corporate ICS & Risk Management. Since fiscal year 2021/22, Aurubis has conducted an annual climate risk analysis in accordance with the recommendations of the TCFD for all companies relevant to the EU Taxonomy [IRO-1](#). Additionally, Corporate ICS & Risk Management conducts risk reviews with local managers at all production sites to promote cooperation towards appropriate adaptation solutions for any significant physical climate risks. Furthermore, the value chain of each respective activity was analyzed for its relevance to climate risks in order to ensure a holistic view of the effects of physical climate risks. The climate risk analyses carried out at Aurubis thus meet the requirements of Annex A, meaning none of the activities screened cause significant harm to the second environmental objective "Climate change adaptation".

A wide range of criteria have been defined at the activity level for the additional environmental objectives: "Sustainable use and protection of water and marine resources", "Transition to a circular economy", "Pollution prevention and control" and "Protection and restoration of biodiversity and ecosystems". These concern, among other things, legally binding requirements that apply or must be implemented in all EU member states. Since there are no taxonomy-eligible projects at non-European sites that fulfill the substantial contribution criterion, only projects at European company sites are subject to the taxonomy alignment assessment regarding the "do no significant harm to the additional environmental objectives" criterion. These fulfill the above-mentioned criteria based on the current legal framework. Additional criteria are covered by internal standards and guidelines or individually verified for a project.

### Complying with the minimum safeguards

The minimum safeguards ensure that there are no violations or negative restrictions with respect to the following topic areas:

- » Human rights, including worker and consumer rights
- » Corruption/bribery
- » Taxation
- » Fair competition

The minimum standards were reviewed at the Group level and are safeguarded at Aurubis through existing standards, Group guidelines, and standards of conduct for employees, suppliers and other business partners. Aurubis has processes for human rights due diligence, processes and training courses for detecting corruption and bribery, instruction in taxation and tax laws, rules of conduct, and instruction in and training on antitrust law. In the 2024/25 fiscal year, there were no convictions against Aurubis AG, any of its subsidiaries, or senior executives in any of the four topic areas. There are procedures and processes for all four topic areas mentioned, which also include inspecting the supply chain [9 G1-2](#). Compliance with the minimum safeguards can be considered fulfilled for all activities in the 2024/25 fiscal year.

### Results of the taxonomy alignment assessment at Aurubis

The photovoltaic installations do no significant harm to the other environmental objectives and are therefore taxonomy aligned subject to compliance with the minimum safeguards.

Consequently, Aurubis maintains taxonomy-aligned activities under categories 7.3 Installation, maintenance and repair of energy efficiency equipment and 7.6 Installation, maintenance and repair of renewable energy technologies.

### Overview of key performance indicators in line with the EU Taxonomy

Economic activities	EUT turnover		EUT CapEx		EUT OpEx	
	in € thousand	in %	in € thousand	in %	in € thousand	in %
<b>A Taxonomy-eligible activities</b>						
<b>A.1 Environmentally sustainable activities (taxonomy aligned)</b>						
KPI environmentally sustainable activities (taxonomy aligned) (A.1)	0	0	8,037	1	0	0
<b>A.2 Taxonomy-eligible, but not environmentally sustainable activities (taxonomy non-aligned activities)</b>						
KPI taxonomy-eligible, but not environmentally sustainable activities (taxonomy non-aligned activities) (A.2)	0	0	137,015	18	0	0
<b>Total (A.1 + A.2)</b>	<b>0</b>	<b>0</b>	<b>145,052</b>	<b>19</b>	<b>0</b>	<b>0</b>
<b>B Taxonomy non-eligible activities</b>						
KPI taxonomy non-eligible activities (B)	18,171,053	100	625,542	81	248,414	100
<b>Total (A+B)</b>	<b>18,171,053</b>	<b>100</b>	<b>770,594</b>	<b>100</b>	<b>248,414</b>	<b>100</b>

### Accounting methods and key performance indicators in line with the EU Taxonomy

The key performance indicators published in the EU Taxonomy are calculated, as in the Aurubis Group financial report, in accordance with International Financial Reporting Standards (IFRS) and include all fully consolidated companies of Aurubis AG. Companies not included in the scope of consolidation, associated companies, and companies classified as held for sale pursuant to IFRS 5 are fundamentally not included in reporting in accordance with the EU Taxonomy. Double counts were prevented by only assigning a taxonomy-eligible project not already included under another activity to an enabling activity.

Aurubis is releasing the following key performance indicators for the 2024/25 fiscal year.

Please refer to the separate reporting forms and to the mandatory tables in [9 Appendix 2](#) for the breakdown of the numerator for the turnover, OpEx, and CapEx key performance indicators in keeping with the EU Taxonomy.

## Turnover

The turnover KPI represents the proportion of the net turnover derived from taxonomy-eligible or taxonomy-aligned economic activities. The net turnover disclosed in accordance with the EU Taxonomy is based on the revenues defined and disclosed in the Consolidated Financial Statements of the Aurubis Group [Q Consolidated Financial Statements, Notes to the Consolidated Financial Statements](#). The proportion of the net turnover derived from taxonomy-eligible and taxonomy-aligned turnover each amounts to 0 % for fiscal year 2024/25.

## Capital expenditures (CapEx)

The CapEx KPI represents the proportion of capital expenditure associated with taxonomy-eligible or taxonomy-aligned economic activities. Capital expenditure in the year under review comprised additions to tangible and intangible fixed assets before depreciation, impairment losses, and revaluations. Capitalized capital expenditures from CapEx projects that can be allocated to taxonomy-eligible or taxonomy-aligned activities are taken into account in the numerator when determining the respective share.

The following types of CapEx are present at Aurubis and included in the numerator for the CapEx KPI:

- » Assets and processes associated with taxonomy-eligible economic activities
- » Individual measures for the low-carbon implementation of the target activity or for the reduction of greenhouse gases that are implemented and operational within 18 months, and acquisitions from taxonomy-aligned activities

The proportion of taxonomy-eligible capital expenditures from the total capital expenditures disclosed in the Consolidated Financial Statements amounts to €145 million or 19 % [Q Consolidated Financial Statements, Notes to the Consolidated Financial Statements](#), of which €8 million or 1 % is taxonomy aligned. The CapEx projects identified as taxonomy aligned are largely attributable to the photovoltaic projects in Pirdop (€5.5 million). The majority of taxonomy-eligible investments were made under economic activity 7.1 Construction of new buildings. There are no taxonomy-aligned activities in this area, as these primarily involve production buildings where energy efficiency is secondary to process and usage requirements.

The capital expenditures in line with the EU Taxonomy Regulation differ significantly from the capital expenditures for environmental protection measures disclosed in the Annual Report, due to the definition in the required taxonomy-eligibility and -alignment assessments [Q Combined Management Report, Environmental protection](#). This is in part because Aurubis' core business and the associated production facilities are currently not eligible for credit in accordance with the Taxonomy Regulation. It is therefore not possible to reconcile these with environmental capital expenditures in the current fiscal year.

## Operating expenses (OpEx)

The OpEx KPI represents the proportion of operating expenditure associated with taxonomy-eligible or taxonomy-aligned economic activities, or that refers to the purchase of products or services from taxonomy-aligned economic activities in accordance with the EU Taxonomy. Operating expenses disclosed in accordance with the EU Taxonomy include research and development expenditures and expenses for short-term leases, along with maintenance and repair costs.

The types of OpEx that the EU Taxonomy stipulates for inclusion are of secondary importance for Aurubis' business model.<sup>1</sup> Taxonomy-eligible and taxonomy-aligned OpEx for Aurubis are therefore reported as 0 % in this fiscal year.

## Challenges and outlook

Overall, uncertainties regarding the implementation of the taxonomy requirements remain, particularly with respect to the interpretation of the EU Taxonomy regarding the analysis of the criteria and data collection, for example. The analysis of Aurubis' economic activities in the context of the EU Taxonomy will be continuously developed with the involvement of a large number of stakeholders in the company, in order to fulfill the dynamically evolving requirements and integrate findings drawn from publications into the EU Taxonomy processes at Aurubis. Changing framework conditions and specifications — especially regarding the possible inclusion of copper activities in the EU Taxonomy and other new guidelines — are continuously monitored and evaluated in this context.

<sup>1</sup> The FAQ from December 19, 2022 defines the secondary significance of operating expenses as given if the operating expenses are irrelevant in relation to the business OpEx as defined by the EU Taxonomy and, as such, not material for the business model. This is the case for Aurubis in the 2024/25 fiscal year. The OpEx as defined by the EU Taxonomy is €0 million compared to a business OpEx of €248 million and as such, with a proportion of 0 %, can be assessed as immaterial.

## E1 – Climate change

As an energy-intensive company, we bear a particular responsibility for climate change mitigation. Our production processes require a significant amount of energy and are the main source of direct and indirect CO<sub>2</sub> emissions – especially in the upstream supply chain, particularly in mining. At the same time, our metals are essential for the energy transition – such as for generating renewable energy and for electromobility, and energy-efficient applications. At the same time, decarbonizing the industry presents significant technical and economic challenges due to the limited availability of market-ready decarbonization technologies and internationally competitively priced renewable energy.

### E1-SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

Aurubis has extensive experience with recycling large volumes of complex materials and is committed to decarbonizing its processes. This creates strategic opportunities where we can support the decarbonization efforts of companies and society, thereby contributing to achieving climate targets.

Our copper cathodes produce only around 40 % of the CO<sub>2</sub> emissions compared to the global average.<sup>1</sup> However, CO<sub>2</sub> emissions are still generated through energy consumption in its production processes – both in operating business and across the value chain. Scope 1, Scope 2 and Scope 3 emissions have been identified as material impacts and are associated with financial risks. These risks stem partly from potential CO<sub>2</sub> cost increases due to rising emission prices and partly from high energy procurement costs, especially for low-carbon energy sources.

Our Industrial Heat project is one of our positive contributions: By providing carbon-free industrial heat to the city of Hamburg, we are contributing to lowering urban emissions and promoting a sustainable local energy supply. Climate-related risks identified during the DMA also include climate policy transition risks. These risks arise from both EU and global regulations for CO<sub>2</sub> emissions trading and taxation.

### IROs identified as material for topic E1 (Climate change)

Sub-topic	IRO type	Name	Location in the value chain	Time horizon
Climate change mitigation	Impact (positive, actual)	Enable the energy and climate transition through providing essential materials	◀ ▲ ▶	□ ■ □
Climate change mitigation	Impact (negative, actual)	CO <sub>2</sub> emissions through own operations (Scope 1)	◀ ▲ ▶	■ □ □
Climate change mitigation	Impact (negative, actual)	CO <sub>2</sub> emissions through energy usage (Scope 2)	◀ ▲ ▶	■ □ □
Climate change mitigation	Impact (negative, actual)	CO <sub>2</sub> emissions through business relationships along the value chain (Scope 3)	◀ ▲ ▶	■ □ □
Climate change mitigation	Impact (positive, potential)	Utilize high standards and expertise in recycling and decarbonization processes	◀ ▲ ▶	□ □ ■
Climate change mitigation	Opportunity	Expand business by utilizing pioneering role in recycling and decarbonization processes	◀ ▲ ▶	□ ■ □
Climate change mitigation	Risk	CO <sub>2</sub> emission price increase	◀ ▲ ▶	■ □ □
Energy	Impact (negative, actual)	Energy consumption in production	◀ ▲ ▶	■ □ □
Energy	Impact (positive, actual)	Partnerships to promote renewable energies	◀ ▲ ▶	■ □ □
Energy	Impact (negative, actual)	Energy-intensive upstream value chain and transport	◀ ▲ ▶	■ □ □
Energy	Risk	High procurement costs for low-carbon energy sources	◀ ▲ ▶	□ ■ □

◀ Upstream value chain
▲ Own operations
▶ Downstream value chain  
■ □ □ Short term
□ ■ □ Medium term
□ □ ■ Long term

Please refer to [Q IRO-1](#) for details on the method for identifying and assessing material IROs.

<sup>1</sup> The CO<sub>2</sub> footprint of Aurubis copper cathodes continues to be significantly below the global average released by the International Copper Association (ICA), as detailed in the corresponding life cycle assessment at [aurubis.com/en/responsibility/environment-energy-and-climate/footprint-of-our-products](https://aurubis.com/en/responsibility/environment-energy-and-climate/footprint-of-our-products). Our life cycle assessments are reviewed by an independent third party, but not by the auditor.

The inclusion of sustainability performance in incentive schemes is addressed in [9 GOV-3](#).

### Climate scenario analysis

Aurubis analyzes climate scenarios to identify and assess climate-related risks and opportunities. For this purpose, we have drawn on the latest scientific findings of the Intergovernmental Panel on Climate Change (IPCC) and evaluated two specific scenarios through to 2050: a 1.5°C scenario (SSP 1) and a >4°C scenario (SSP 5). The best-case scenario is the Shared Socioeconomic Pathway 1 (SSP 1) and comparable to the International Energy Agency’s (IEA) NZE 2050 scenario and presumes internationally coordinated development aligned with the Paris Climate Agreement. In contrast, the >4°C scenario (SSP 5) sees climate change mitigation measures reduced to a minimum.

#### 1.5°C scenario — SSP 1 and IEA NZE 2050

The 1.5°C pathway describes a sustainable development pathway in which greenhouse gas emissions are significantly reduced by 2030, particularly through the increased use of renewable energy. By 2050, global CO<sub>2</sub> emissions have been reduced to net zero, meaning more CO<sub>2</sub> is captured than emitted. Advanced economies are expected to reach this target earlier than less-developed economies. Achieving the net-zero target requires comprehensive policy measures, which will have various impacts. The CO<sub>2</sub> price is expected to rise to as much as US\$250/t by 2050. At the same time, prices for fossil fuels such as oil, gas and coal are projected to decline, though they will remain high. Emissions trading systems modeled after the European approach are introduced in many countries, including the US and China. Government subsidies promote the expansion of renewable energy. Global decarbonization efforts drive a significant increase in demand for metals such as copper and nickel, which are essential to the energy transition, leading to higher metal prices. As a result, supply grows through the development of new deposits, though not to the same extent, supporting higher prices. At the same time, the expansion of mining is constrained by the growing focus on sustainability, environmental protection, and respect for human rights. These developments foster stronger political support for recycling activities, especially in Western countries, in which copper is classified as a strategically critical metal for the energy transition.

Based on this, we have identified both physical and transition climate risks for our company. Physical risks primarily include flooding and storms at individual sites. To counter these, we are investing in our plant infrastructure and have appropriate insurance coverage. Transition risks mainly arise from the need to convert all carbon-emitting production processes to carbon-neutral methods before 2050, including carbon

capture or utilization (compare to the challenges described in detail in E1-1 and E1-3). Political risks stem from stricter CO<sub>2</sub> regulations, such as the European Carbon Border Adjustment Mechanism (CBAM), and rising CO<sub>2</sub> prices. Forecasts suggest that CO<sub>2</sub> prices could rise to as much as US\$180/t in the next ten years, while the current system of free carbon credits may be phased out. Aurubis will continue to have relevant Scope 1 emissions, which represents a material risk. There are also reputational and market risks if we fail to meet our decarbonization targets. There are also opportunities such as from expanding our recycling activities, like the Aurubis Richmond plant in the US. Our smelter network could also benefit from rising metal prices and higher refining charges for recycling materials in the long term.

#### >4°C scenario — SSP 5

This scenario describes a world strongly focused on economic growth and technical innovation. Great importance is attached to fossil fuels for maximizing growth, resulting in very high energy consumption. Global CO<sub>2</sub> emissions are expected to continue rising through 2050 compared to the present with fossil fuels remaining the majority of the energy supply. The average global temperature could increase by more than 4°C above pre-industrial levels by the year 2100. This scenario involves a global climate crisis marked by heatwaves, forest fires and wildfires, droughts and shortages of clean, potable water on the one hand, and flooding due to sea level rise and more frequent tropical cyclones on the other. The number of regional crises increases, as do global geopolitical conflicts triggered by clashes over the distribution of scarce water and food resources due to the climate crisis. Global migration waves from climate crisis regions further ratchet up geopolitical tensions. The climate crisis also leads to a reduction in global assets due to natural disasters coupled with a strong decline in insurance coverage. The overall result is decreasing gross domestic product.

This scenario holds increased physical climate risks for our sites that are exacerbated by a lower level of insurance protection. The global climate crisis, geopolitical conflicts, migration waves and declining global gross domestic product pose risks to our business model and strategy that are currently unquantifiable and difficult to assess. In this scenario, there is no transformation towards a climate-neutral society and as such no identifiable transition risks. There are also no discernible opportunities for our business model and strategy in this scenario.

**Analysis and findings**

We see the greatest opportunities in the 1.5°C scenario, especially in the long term. In the short and medium term, we will mitigate the transition risks by consistently implementing our strategic targets, such as decarbonization. In contrast, we do not see any realistic opportunities for our business model in the >4°C scenario, where the physical risks to our sites would increase significantly. The specific impacts on the economy and society are currently difficult to predict. The analysis confirms that our strategy is aligned with the Paris Climate Agreement. Actual development is likely to fall somewhere between the two extreme scenarios.

**Mapping of transition and physical risks**

The table below shows the transition as well as the high to very high chronic and acute physical risks for our own operations and for our suppliers. For physical risks, the analysis is limited to Aurubis sites and those suppliers identified by MunichRE as having a higher gross risk of possible damage from climate-related natural disasters. The individual risk categories are divided into different risk types, which we use to describe the risks in more detail. We order them by chronological term of impact and assign them to the segment or site affected. For suppliers, we focused on one of our most important raw materials — copper concentrates — and closely analyzed the 20 largest mines by volume. These mines account for a significant share of our concentrate throughput Group-wide. We only specify the associated countries and not the mine locations and companies for reasons related to competition.

Risk category	Risk type	Risk description	Timeline	Segment/city/region affected
<b>Transition risks (Aurubis)</b>	Technological risks	Arise from the conversion of all carbon-emitting production processes to exclusively carbon-neutral processes by 2050, including CO <sub>2</sub> storage/utilization for raw material-related CO <sub>2</sub> emissions (e.g., risk of high investment and operating costs, such as with the use of hydrogen; compare to the challenges described in detail in E1-1 and E1-3)	Medium, long term	Custom Smelting & Products, Multimetal Recycling
	Political risks	Result from global CO <sub>2</sub> tax regulations, the European Carbon Border Adjustment Mechanism (CBAM), and other political factors that lead to further increases in energy prices; also linked to the continued insufficient recognition of carbon-free industrial heat supplied for district heating within the framework of the EU-ETS (European emissions trading system) or alternative compensation systems	Medium, long term	Custom Smelting & Products, Multimetal Recycling
	Reputation and market risks	Result from non-achievement of decarbonization targets (e.g., negative impact on marketing campaigns for Aurubis copper products)	Medium term	Custom Smelting & Products
<b>Physical risks (Aurubis)</b>	Acute extreme weather events	Risk of an (extra)tropical cyclone, a tornado, heavy rains and storms (including hail)	Short, medium term	Pirdop (BG), Augusta (US)
		Flooding and river flooding	Short, medium term	Hamburg (DE), Stolberg (DE) <sup>1</sup> , Augusta (US), Indonesia <sup>1</sup> , Peru
	Chronic climate change	Changes in temperature and precipitation patterns (e.g., heavy rain, drought, heat), sea-level rise	Long term	Hamburg (DE), Augusta (US), Pirdop (BG), Stolberg (DE), Berango (ES), Avellino (IT), Brazil, Chile, Indonesia, Peru, Turkey

<sup>1</sup> Risks only moderate, but included due to actual events that occurred.

## Resilience analysis

The assessment of physical and transition risks through scenario analyses forms the basis of our resilience analysis, which we conducted in fiscal year 2024/25. These findings help us evaluate the robustness of our strategy and business model for the impacts of climate change. Our largest transition risks stem from CO<sub>2</sub> price development in the countries we operate in. We consider both the estimated price per emitted ton of CO<sub>2</sub> and potential changes in legislation regarding CO<sub>2</sub> pricing schemes. Our analysis includes current and future Scope 1 and Scope 2 CO<sub>2</sub> emissions based on our decarbonization roadmap and the CO<sub>2</sub> prices in the International Energy Agency's (IEA) Net Zero Emissions (NZE) scenario.

In the short and medium term, we do not see any significant transition risks. There is, however, a risk in the long term, given that CO<sub>2</sub> prices in advanced economies could reach up to US\$180/t in ten years according to the NZE. The EU free carbon credits scheme is expected to be phased out, while Aurubis will continue to have substantial CO<sub>2</sub> emissions. We are aiming for climate-neutral production well before 2050, which will cause the risk to fall again between 2035 and 2050.

Aurubis has set ambitious targets for reducing CO<sub>2</sub> emissions and is addressing the identified transition risks through the increased use of renewable energy and energy efficiency measures, which also increases Aurubis' resilience.

Our insurance contracts also cover the financial impacts of physical climate risks, with the exception of storm surge risks in Hamburg. However, from today's perspective, we cannot reliably assess whether this insurance coverage will remain in place in the future. We are also addressing these physical risks through investments in our infrastructure aimed at increasing resilience to physical climate risks. These include improving the water supply in Pirdop and modernizing the production site in Stolberg. In addition, we will need to address constructing new flood protection systems for our Hamburg plant in the 2030s. Overall, these actions will strengthen Aurubis' ability to mitigate potential risks early and thereby increase resilience.

## E1-1 — Transition plan for climate change mitigation

A transition plan for climate change mitigation was drafted for the first time in fiscal year 2024/25. It serves to define and monitor target achievement in the "Energy and climate" area, define responsibilities, and identify both decarbonization activities and investment needs. The transition plan thus contributes to

aligning Aurubis' business activities with the 1.5°C target from the Paris Climate Agreement. We outline our targets in [Q E1-4](#). Aurubis is not excluded from the EU's Paris-aligned benchmarks.

The actions defined in the transition plan will be implemented in the coming years to achieve the self-imposed climate targets under [Q E1-3](#). We will conduct regular reviews to assess whether our actions need to be adjusted to reflect current developments or new scientific findings.

The transition plan is therefore an integral part of our corporate strategy and financial planning. Financial and scheduling aspects for implementing actions for the decarbonization levers are approached in a holistic and comprehensive manner.

The Corporate Sustainability division is responsible for coordinating the decarbonization strategy, targets and actions — as integral parts of the comprehensive transition plan — across the Group as well as steering their implementation and further developing them. To ensure a consistent approach, create synergies, and identify best-practice measures, formats such as an annual Group Decarbonization Workshop and a number of cross-site working groups have been established. These groups meet two to four times a year to exchange ideas on comparable processes and equipment in the context of decarbonization. Group-wide and site-specific progress is managed through regular strategic committees or meetings.

Please refer to [Q E1-3](#) and [Q E1-4](#) for details on our emissions targets, including climate change mitigation and decarbonization actions from our transition plan. The transition plan was approved by both the Executive Board and the Supervisory Board.

At the product level, we are already seeing initial decarbonization successes. Our carbon footprint for many of our metals is already less than half the global average. To assess the environmental impact of Aurubis products, we regularly conduct life cycle assessments with external support using the Environmental Footprint 3.0 methodology and compare these with average values from the International Copper Association (ICA). We publish the results of these assessments on our website. Furthermore, we are making a significant contribution to the energy transition beyond our plant boundaries through our products and through the supply of carbon-free industrial heat in Hamburg in particular.

### CapEx for implementing the transition plan

Transition plan implementation is closely integrated into the Group's financial planning. This includes both operating expenses (OpEx) and capital expenditures (CapEx) to fund various decarbonization measures. The specific actions employed to reduce emissions and achieve targets are continuously assessed and prioritized based on economic and technological considerations. Funding for transition plan implementation is reviewed and approved on a project-by-project basis. In the 2024/25 fiscal year, CapEx for decarbonization actions amounted to approximately €16 million. As part of our medium-term planning, which consists of a budget year and three additional planning years, investments totaling approximately €42 million are planned for fiscal years 2025/26 to 2028/29 for Scope 1 and Scope 2 actions in line with our transition plan. Additional investments required to meet the 2030 target that go beyond the current medium-term planning horizon will be considered in subsequent annual medium-term planning cycles and considered in the planning for future fiscal years. Beyond 2030, the company does not currently provide a detailed classification of forward-looking information on sustainable investments due to unforeseeable developments regarding factors such as energy costs, technology and infrastructure availability, the funding landscape and political and geopolitical conditions. For additional details please refer to [Q E1-3](#).

The Aurubis product portfolio includes intermediate products that are used in a wide range of renewable energy use solutions, energy-efficient applications, and low-carbon mobility. Although these intermediate products are not covered by the EU Taxonomy, Aurubis considers them important drivers of the energy transition and essential for achieving the European climate targets. The [Q EU Taxonomy](#) section outlines the activities and projects that make a significant contribution to climate change mitigation and includes the results of the taxonomy alignment assessment.

### Locked-in emissions

Unavoidable process emissions were identified as a key challenge when locked-in emissions were assessed. Copper concentrates derived from ores are processed into copper cathodes in the primary smelters. Unavoidable CO<sub>2</sub> emissions occur during the smelting process due to the carbon content inherent in the raw materials. This is also true for the secondary smelters, which process a wide range of organic and inorganic metal-containing recycling materials. Despite comprehensive sorting and preparation of these materials, plastic residues, such as those found in electronic scrap, cause unavoidable process emissions that can account for up to 50 % of a secondary smelter's Scope 1 emissions. There are currently no market-ready technological solutions for separating these unavoidable process emissions, as the CO<sub>2</sub> concentration in the exhaust gases from our production processes is very low. These unavoidable process emissions

currently amount to around 150,000 to 180,000 t CO<sub>2</sub> per year in the Aurubis Group. With the gradual commissioning of the first phase of our multimetal recycling plant in the US (Aurubis Richmond), which began operating in fiscal year 2024/25, metals will be recovered using state-of-the-art technology, including from electronic scrap of varying qualities. This will initially lead to a further increase in unavoidable process emissions. Such growth projects were accounted for when the transition plan and the 2030 target were developed.

From today's perspective, these locked-in emissions do not pose a risk to achieving our short-term 2030 target. However, they represent a significant challenge for our long-term target of carbon-free production, requiring further technological development. With these technologies, we assess the transition risks as manageable.

Please refer to [Q E1-6](#) for greenhouse gas emission calculation for the 2024/25 fiscal year.

### Implementation challenges

Aurubis is targeting carbon-neutral production (Scope 1 and 2) before 2050. Recent years have been marked by constant changes in technology, the global economic climate and politics, however. In light of this, key questions remain unanswered regarding how the copper industry can be fully decarbonized. There is currently no market-ready, industrially tested, and economically viable solution available. The distinct conditions at each Aurubis site require tailored decarbonization approaches, which is why we continue to take a technology-open approach.

To implement decarbonization solutions cost-effectively, low-carbon energy sources must be reliably and sufficiently available at all times. Moreover, the full energy mix required for a sustainable transformation in Germany, Europe and the US — including infrastructure costs — must be offered at internationally competitive prices. This also includes the necessary infrastructure, such as for carbon-free hydrogen. Appropriate regulatory and economic frameworks still need to be put in place here. Without the necessary external conditions to support the path to carbon neutrality by 2050, implementing the transition plan will continue to pose significant challenges. Our growth strategy in the recycling sector poses a particular challenge, as we are currently expanding faster than we can decarbonize — largely because suitable decarbonization technologies are not yet available on the market and competitively priced renewable energy is limitedly available.

## E1-2 — Policies related to climate change mitigation and adaptation

Our contribution to climate change mitigation is an important part of our corporate strategy. The production of copper and other non-ferrous metals is Aurubis’ core business. Given the critical role these metals play in enabling the energy transition and electromobility, we make an important contribution to decarbonizing both the power supply and transport. At the same time, we are striving to decarbonize our own production before 2050. That is why we have made a firm commitment to decarbonization in our Code of Conduct, for example, and have developed decarbonization policies for our own operations.

Our Group-wide decarbonization levers are described in more detail under [9 E1-3](#). Our Corporate Sustainability Policy defines the development and management of our decarbonization strategy, which includes site-specific roadmaps, evaluating alternative decarbonization scenarios, and drafting and implementing a climate change mitigation transition plan aimed at achieving carbon neutrality before 2050. We are committed to further improving energy efficiency, reducing reliance on fossil fuels, and driving the expansion of renewable energy solutions. This approach is outlined in our Corporate Energy & Climate Policy. This is also how we reduce the risk that an increase in CO<sub>2</sub> emission prices poses to our business activities.

A significant portion of the CO<sub>2</sub> emissions linked to our products originates in the supply chain, particularly at the mining stage. We work with our suppliers to achieve emission reductions here as well. Our Business Partner Code of Conduct sets forth clear expectations of our partners to proactively mitigate and manage the risks and impacts associated with climate change. Agreeing to follow this code of conduct by our direct suppliers is a fundamental prerequisite for entering into a business relationship. Initiating the Copper Mark certification process is already listed as a target in some of our concentrate contracts. Setting climate targets is one of the requirements for obtaining Copper Mark certification.

Please refer to [9 IRO-2](#) for a list of all the applicable policies and commitments.

## Policies related to the material IROs

Impacts/risks/opportunities	Policies
Enable the energy and climate transition through providing essential materials	Company strategy
CO <sub>2</sub> emissions through own operations (Scope 1)	Aurubis Code of Conduct Corporate Sustainability Policy Corporate Energy & Climate Policy
CO <sub>2</sub> emissions through energy usage (Scope 2)	Aurubis Code of Conduct Corporate Sustainability Policy Corporate Energy & Climate Policy
CO <sub>2</sub> emissions through business relationships along the value chain (Scope 3)	Business Partner Code of Conduct Corporate Sustainability Policy
Utilize high standards and expertise in recycling and decarbonization processes	Company strategy
Energy consumption in production	Corporate Energy & Climate Policy
Partnerships to promote renewable energies	Company strategy
Energy-intensive upstream value chain and transport	Aurubis Business Partner Code of Conduct Corporate Sustainability Policy
CO <sub>2</sub> emission price increase	Corporate Energy & Climate Policy
Expand business by utilizing pioneering role in recycling and decarbonization processes	Company strategy
High procurement costs for low-carbon energy sources	Corporate Energy & Climate Policy

## E1-3 — Actions and resources related to climate change policies

We utilize a range of decarbonization levers and corresponding actions to achieve our climate targets. These levers primarily include the generation of renewable electricity (Scope 2), the procurement of renewable electricity (Scope 2), the use of alternative energy sources (Scope 1), improvements in energy efficiency and electrification, as well as the use of hydrogen. Additionally, we work closely with our suppliers on decarbonizing Scope 3 emissions.

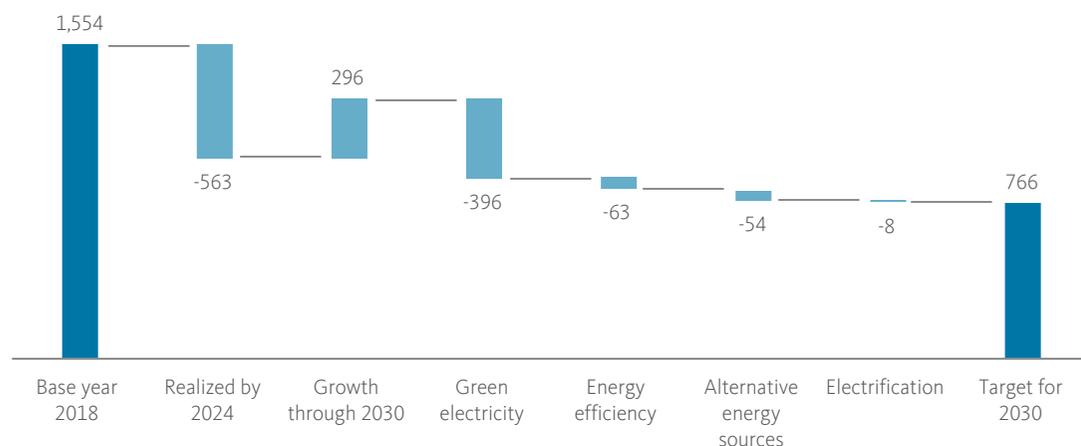
The practical implementation of these decarbonization levers is highly dependent on economic and political framework conditions.

### Decarbonization levers in our own operations (Scope 1 & 2) by 2030<sup>1</sup>

The graph below illustrates the decarbonization levers and the planned reduction (in kt CO<sub>2</sub>) of Scope 1 and Scope 2 emissions by 2030 (in calendar years):

### CO<sub>2</sub> reduction through decarbonization levers (Scope 1 & 2) by 2030

in 1,000 t CO<sub>2</sub>



For more detailed information about our targets, please refer to [9 E1-4](#).

### Self-generated renewable energy (Scope 2)

On-site renewable electricity generation is an important lever for decarbonizing the sites. A 10 MWp (megawatt peak) captive solar plant, Aurubis-1, went online at the Aurubis site in Pirdop (Bulgaria) at the end of 2021. In April 2024, construction began on the Aurubis-2 and Aurubis-3 expansion projects, with capacities of 7 MWp and 6.5 MWp respectively. Aurubis-3 was commissioned in the third quarter of 2025. An additional expansion stage (Aurubis-4 with a capacity of 18 MWp) is planned for 2026. Altogether, the four plants will have a combined capacity of 41 MWp and are expected to reduce CO<sub>2</sub> emissions by

approximately 16,500 t per year. Once fully operational, the four plants will generate an estimated 54 million kWh of electricity per year.

This corresponds to around 15 % of the Pirdop site’s electricity needs. The total investment for the entire project is expected to be around €35 million.

### Renewable electricity procurement (Scope 2)

Aurubis leverages external solutions to further decarbonize electricity consumption at sites where self-generated electricity is not sufficient. Aurubis Olen (Belgium) concluded a power purchase agreement with the Dutch Eneco energy supply company in 2022. Under this agreement, a 12 MW connected load will be sourced from the Belgian SeaMade offshore wind farm over a period of ten years. Since January 2023, around 90 % of the electricity generated externally for Aurubis Olen has come from renewable energies. This contract reduces the site’s CO<sub>2</sub> emissions by 42,000 t per year. Feasibility studies are also underway at other sites to explore how the share of renewable electricity can be further increased. At the German sites, the objective is to achieve 100 % renewable electricity by 2030 through the acquisition of guarantees of origin.

### Increasing energy efficiency (Scope 2)

Improving energy efficiency at our sites is a key pillar of our decarbonization strategy. All of our production sites are equipped with certified energy management and monitoring systems in accordance with ISO 50001. These systems enable efficient energy consumption management and help systematically identify potential savings. The certification process for the Richmond site will be initiated once the required energy data for a twelve-month period is available in full. In the meantime, all pertinent data will be gathered and assessed internally to ensure readiness for the external audit.

A clear example of enhanced energy efficiency is at our site in Pirdop (Bulgaria), where approximately 460 high- and medium-voltage motors are being replaced with high-efficiency models from a leading equipment manufacturer. The project is scheduled for completion in fiscal year 2025/26. The site will save around 25 million kWh per year going forward — the equivalent of the annual consumption of about 7,000 four-person households. This will enable the Pirdop plant to avoid around 7,800 t of CO<sub>2</sub> emissions per year. The

<sup>1</sup> Information relating to calendar years is not included in the auditor’s scope.

planned investment amounts to approximately €10 million. There are plans to extend the project to cover additional motors, replace transformers, and invest in advanced lighting technologies.

An expansion of the cathode shaft furnace in the rod plant at the Avellino site is in planning, which is expected to improve efficiency and lead to natural gas savings equivalent to approximately 3,500 t of CO<sub>2</sub>. The project involves a planned investment of around €6 million, with commissioning scheduled for the 2025/26 fiscal year.

We support partnerships that promote renewable energy and thus contribute to the energy transition. We are also committed to reducing CO<sub>2</sub> emissions beyond our own plants. Such as with the Industrial Heat project in Hamburg, which we realized in cooperation with Hamburger Energiewerke and enercity. Since 2018, we have supplied heat energy to Hafencity East, and we kicked off the renovations for the Industrial Heat 2.0 project in July 2024. Adapting a secondary process in copper production at the Hamburg plant enables us to supply heat for a total of up to 28,000 four-person households annually, starting with the 2024/25 season, avoiding up to 120,000 t of CO<sub>2</sub> emissions in Hamburg. This targeted heat supply represents the largest use of industrial heat in Germany and is a significant contribution to the energy transition in Hamburg.

#### Use of alternative energy sources (Scope 1)

We are working on actions to replace fossil fuels with renewable energy sources. In Hamburg, Lünen (both Germany) and Pirdop (Bulgaria), we have steam turbines in operation that use excess process heat to generate electricity. In fiscal year 2024/25 this avoided 9,747 t of CO<sub>2</sub> compared to a conventional electricity supply. We have operated a steam storage system to stabilize the steam supply in the network and lower the use of additional natural gas-based boilers at the Lünen site since July 2025. This avoids approximately 4,900 t of CO<sub>2</sub> annually during ongoing operations.

We plan to gradually convert the steam boilers currently powered by fossil fuels to electricity by 2030. We are also currently assessing and testing the availability and use of biocoal/biocoke as an alternative to fossil coal and fossil coke, which are used as reducing agents in our processes.

#### Increasing electrification

Electrifying equipment is another decarbonization lever and specifically contributes to reducing Scope 1 emissions by replacing fossil fuels. The electrode steam boiler at the Hamburg plant is one specific example.

It can flexibly take over part of the load from our natural gas-powered steam generators during periods of surplus renewable electricity. If completely run on renewable electricity, this 10 MW system alone could avoid up to 4,000 t of CO<sub>2</sub> per year. Replacing additional natural gas-powered steam boilers with electrode steam boilers in combination with a storage system is currently being evaluated at several sites.

#### Decarbonization levers in own operations (Scope 1) as of 2030

In addition to the decarbonization levers already mentioned, the following levers will also become relevant starting in 2030:

##### Hydrogen usage

Carbon-free hydrogen is currently not available to our industry in sufficient quantities or at internationally competitive prices. It will only become relevant as a decarbonization lever for the Aurubis Group after 2030. This is illustrated by the fact that the upstream infrastructure for pipeline-based green hydrogen at the Hamburg site is not expected to be completed before 2031. We rely on adjustments to regulatory frameworks in the coming years to ensure that carbon-free or low-carbon hydrogen becomes a competitive energy market product after 2030.

Low-carbon hydrogen is also regarded as a key technology for decarbonizing industry. Aurubis sees great potential in utilizing hydrogen in its anode furnaces and continues to lead the way in decarbonization processes. We carried out a series of tests at the Hamburg plant back in 2021. In spring 2024, we became one of the first copper smelters globally to install hydrogen-ready anode furnaces during a scheduled maintenance shutdown, an investment totaling €40 million, at the Hamburg site. They could reduce CO<sub>2</sub> emissions by approximately 5,000 t annually when operated exclusively with hydrogen. Even before being connected to a hydrogen supply network, the new furnaces are already contributing to Aurubis' decarbonization efforts. They operate more efficiently and use up to 30 % less natural gas, resulting in a CO<sub>2</sub> reduction of nearly 1,200 t per year.

In collaboration with our partners KME, SMS and TU Bergakademie Freiberg, Aurubis is participating in the "H4Cu — Natural Gas Substitution by Hydrogen in the Production of Semi-Finished Copper Products" research project funded by the German Federal Ministry for Economic Affairs and Energy. The project explores ecological, technical and economic dimensions to evaluate how hydrogen use can be scaled to industrial-level applications (time period: September 2024 to August 2027).

### Decarbonizing the value chain (Scope 3)

Since the majority of our Scope 3 emissions stems from the activities of the mining companies supplying our copper concentrates, the most effective strategies for reducing these emissions involve expanding recycling initiatives and strengthening collaboration with stakeholders throughout our supply chains. These emissions fall under category 3.1. The decarbonization levers were not quantified since the 2030 target has already been achieved. Actions to optimize Scope 3 emission reduction will continue to be reviewed and implemented regardless.

Target achievement is clearly illustrated in the “2030 Target: Scope 3 Emissions” figure. The current 4.14 t CO<sub>2</sub> per t copper cathodes is already below the 4.5 t CO<sub>2</sub> per t copper cathodes target. The decarbonization levers are described in more detail below, since they will also be relevant for future targets beyond 2030.

#### Recycling activities

Our recycling activities contribute to lowering CO<sub>2</sub> emissions across the value chain, particularly since copper concentrate extraction represents the largest portion of our total Scope 3 emissions. By increasing the use of recycled materials and optimizing our recycling processes, we can reduce the proportional need for primary raw materials and thereby lower the greenhouse gas emissions associated with their extraction. We outline our recycling activities and the corresponding actions in more detail in [Q E5-2](#).

#### Collaboration in the supply chains

We are in dialogue with our most important suppliers to monitor their progress in reducing CO<sub>2</sub> emissions. By sharing overarching information about this topic, we indirectly promote the exchange of best practices among individual mines to ensure that successful approaches and experiences are shared and adopted. Here we have noticed that mining companies are increasingly using renewable energy and electrifying their processes.

### E1-4 — Targets related to climate change mitigation and adaptation<sup>1</sup>

We aspire to be carbon-neutral before 2050 and have set targets as part of our corporate strategy for both our own operations and for our value chain:

#### 2030 targets (calendar year)

- » -50 % absolute Scope 1 and Scope 2 emissions (reference year 2018)
- » -24 % Scope 3 emissions per ton of copper cathodes<sup>2</sup> (reference year 2018)

Our CO<sub>2</sub> reduction targets for Scope 1, 2 and 3, including base year 2018, are based on the calendar year rather than the fiscal year and as such differ from the reporting period in accordance with ESRS. This is primarily because the climate model we selected is based on calendar-year data. This does not, however, compromise the quality of our targets in any way.

#### Targets — methodology and monitoring

Aurubis joined the UN Global Compact Business Ambition for 1.5°C initiative in 2019. In June 2021, the Science Based Targets initiative (SBTi) validated our CO<sub>2</sub>-reduction targets. This SBTi confirmation means that our 2030 targets meet scientific standards and contribute to limiting global warming to 1.5°C in line with the Paris Climate Agreement. In accordance with this SBTi target, we have committed to reducing absolute Scope 1 and Scope 2 emissions — i.e., CO<sub>2</sub> emissions from combustion in our own facilities and from purchased energy — by 50 % by 2030 compared to the representative base year 2018 (a year with no special effects such as shutdowns).<sup>3</sup> The identified decarbonization levers are described in more detail in [Q E1-3](#).

Scope 2 emissions were calculated using a market-based approach in accordance with the Greenhouse Gas Protocol (GHG Protocol). In calendar year 2024, we reduced Scope 1 and Scope 2 emissions by 38 % compared to 2018. In six years, we have already achieved more than half of the targeted reduction. Implementing decarbonization projects and integrating more renewable electricity in the electricity procurement strategy significantly contributed to achieving this reduction.

<sup>1</sup> Information relating to calendar years is not included in the auditor’s scope.

<sup>2</sup> Refers to internally produced copper cathodes.

<sup>3</sup> We assume that our Scope 2 emissions will decrease by approximately 85 % in the 2018–2030 period. Despite completed and planned Scope 1 reduction projects, it should be assumed that Scope 1 emissions will increase by roughly 8 % in the 2018–2030 period due to company growth (particularly the commissioning of the new recycling plant in the US). SBTi validated the combined Scope 1 and Scope 2 target but not the anticipated contribution to target achievement for the two individual Scopes.

In accordance with SBTi guidelines, we will review our science-based CO<sub>2</sub> targets in 2026 to ensure they remain compatible with current SBTi criteria and climate scenarios. In addition to the SBTi, we are currently evaluating additional methodologies for setting science-based CO<sub>2</sub>-reduction targets. Unlike the SBTi, these approaches incorporate a sector-specific decarbonization pathway tailored to our industry. One such option is the Sector Decarbonization Approach (SDA) being developed by the Copper Mark. This framework offers a clear methodology designed to help copper producers establish emissions reduction targets aligned with the 1.5°C climate target, while also considering the necessary copper production growth trajectory and sector-specific decarbonization challenges. We are in direct contact with the Copper Mark and actively engaged in its consultation process. The insights gained from this sector-specific approach will inform the ongoing development of our climate change mitigation transition plan.

Evolving market dynamics, regulatory changes, technological advancements, and competitive pressures in a global environment as well as investment decisions for future growth projects may influence the feasibility of our targets. These internal and external factors will be considered during target reviews.

Our SBTi target also includes Scope 3 emissions, which arise across upstream and downstream stages of the value chain. To address this, we have committed to an intensity-based target to reduce Scope 3 emissions by 24 % per t copper cathode<sup>1</sup> by 2030.

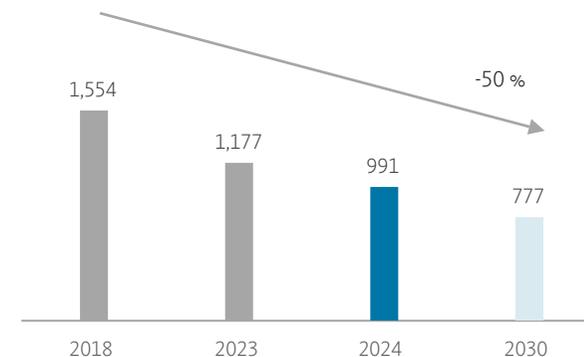
We have successfully reduced Scope 3 emissions by 30 % compared to 2018. As part of the Copper Mark certification requirements, our suppliers are expected to set science-based CO<sub>2</sub>-reduction targets aligned with the Paris Climate Agreement. Our 2030 target to double the share of certified or audited copper concentrates [S2-5](#) serves as a strong incentive for suppliers, who play a crucial role in helping us achieve our Scope 3 targets.

<sup>1</sup> Refers to internally produced copper cathodes.

<sup>2</sup> In past reporting years, values were rounded for both the base year and the target year.

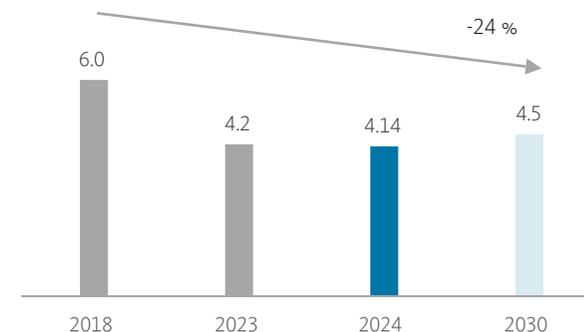
**2030 target: Scope 1 and Scope 2 emissions<sup>2</sup>**

in 1,000 t CO<sub>2</sub>



**2030 target: Scope 3 emissions**

in t CO<sub>2</sub> per t copper cathodes



In line with ESRS requirements, we will establish new targets for Scope 1, 2 and 3 emissions at five-year intervals beginning in 2030.

## E1-5 — Energy consumption and mix

### Methods and significant assumptions

Energy consumption at our sites is measured based on actual usage per category (natural gas, electricity, etc.) and converted into MWh in accordance with ISO 50001.

Energy consumption is calculated as the net balance of total energy inputs.

This includes:

- » **Purchased direct and indirect energy** sourced from renewable and non-renewable sources.
  - » **Non-renewable sources:** Primarily originate from fuel used in production processes and building heating. Additionally, grid-sourced electricity not covered by renewable energy contracts contributes to our non-renewable energy use.
  - » **Renewable sources:** Includes electricity secured through contracts from various sources, as well as renewable energy from the grid mix.
- » **Self-generated energy** (e.g., photovoltaic systems)

The metrics required under the EU ETS are subject to external verification. In Germany, this verification is carried out by the Technical Control Board (TÜV) and by comparable organizations in other countries.

## Energy consumption and mix

<b>Energy consumption from non-renewable sources</b>	Unit	<b>2024/25</b>
(1) Fuel consumption from coal and coal products	MWh	104,054
(2) Fuel consumption from crude oil and petroleum products	MWh	270,238
(3) Fuel consumption from natural gas	MWh	1,210,832
(4) Fuel consumption from other fossil sources	MWh	24,770
(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources	MWh	1,246,064
<b>(6) Total fossil energy consumption (calculated as the sum of lines 1 to 5)</b>	MWh	<b>2,855,957</b>
<b>Share of fossil sources in total energy consumption</b>	%	<b>91</b>
(7) Consumption from nuclear sources	MWh	71,593
Share of consumption from nuclear sources in total energy consumption	%	2

### Energy consumption from renewable sources

(8) Fuel consumption for renewable sources <sup>1</sup>	MWh	2,954
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	MWh	148,975
(10) The consumption of self-generated non-fuel renewable energy	MWh	60,813
<b>(11) Total renewable energy consumption (calculated as the sum of lines 8 to 10)</b>	MWh	<b>212,742</b>
<b>Share of renewable sources in total energy consumption</b>	%	<b>7</b>
<b>Total energy consumption (calculated as the sum of lines 6, 7 and 11)</b>	MWh	<b>3,140,292</b>

<sup>1</sup> Includes industrial and municipal waste of biologic origin, biogas, hydrogen from renewable sources.

## Energy intensity per net revenue<sup>2</sup>

in MWh per € million	<b>2024/25</b>
Total energy consumption per net revenue	173

<sup>2</sup> Turnover is not segmented pursuant to NACE codes in the financial reporting, so we base the calculation of the metric on total turnover. Aurubis does not view this metric as relevant for control purposes, since it neither conveys the specific demands of the business model, nor does it ensure a meaningful comparison between different periods. The calculation is based on the turnover provided in the Consolidated Financial Statements, see [Consolidated Financial Statements](#), [Consolidated Income Statement](#).

The ESRS defines sectors as high climate impact if they fall under Sections A to H and Section L of the NACE codes (EU Nomenclature of Economic Activities). Most of Aurubis' activities can be allocated to Section C: Manufacturing, particularly:

- » NACE 24.44 Copper production
- » NACE 24.45 Other non-ferrous metal production
- » NACE 24.43 Lead, zinc and tin production
- » NACE 20.13 Manufacture of other inorganic basic chemicals

### Renewable and non-renewable energy production

in MWh	2024/25
Non-renewable energy production	7,875
Renewable energy production	60,813

## E1-6 — Gross Scopes 1, 2, 3 and Total GHG emissions

### Methods and significant assumptions

Aurubis calculates its **Scope 1 emissions** in accordance with the [Greenhouse Gas Protocol](#) (amended version) methodology, the most widely used global standard for greenhouse gas accounting, along with methodologies of the “European Union Emissions Trading System (EU ETS): Monitoring and Reporting Regulation (MRR) — General Guidelines for Installations.” The EU-ETS emissions were verified externally based on calendar year.

The selected approach for process emissions (from raw and input materials) as part of Scope 1 emissions is based on verified ETS data, analytical values, and the actual quantities of materials used, in order to reflect the emissions situation as accurately as possible.

For **Scope 2 emissions**, we calculate:

- » **Market-based emission factors**, which reflect specific energy contracts, including renewable electricity attributes (where applicable), or when no specific contracts exist, the residual grid mix or region-specific mixes, provided such data is available.
- » **Location-based emission factors**, for which we use country-specific average grid values.

Scope 2 emissions are recorded in accordance with the Greenhouse Gas Protocol. Contractual instruments such as guarantees of origin are included for the German sites at a rate of 50 %. This results in the use of instruments for 33 % of total electricity consumption.

The **Scope 3 emissions** estimation covers all upstream and downstream Scope 3 categories in accordance with the Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard, which includes 15 emission categories. These estimations particularly apply to Category 1, purchased goods and services. The emissions are estimated by multiplying the activity or consumption data with the relevant CO<sub>2</sub> emission factors. The calculation uses supplier-specific emission factors (where available), specific regional emission factors for the remaining primary raw materials from life cycle assessment databases, and the consumption-based method for other materials. Wherever possible, we also integrate data from established research and benchmarking databases such as Skarn (focused on the mining industry) and GaBi (life cycle assessments), as well as emission factors from life cycle assessments provided by industry associations such as the International Copper Association (ICA). Over the years, our data quality has therefore improved. We have not received any primary data directly from our suppliers thus far.

Due to a lack of current data, employee commuting information (Scope 3, Category 7) was also estimated using statistics, average commuting distances and vehicle types. We analyze the materiality of Scope 3 categories every three years. Based on our materiality analysis, certain Scope 3 emission categories have been classified as non-material and either consolidated with other categories or excluded from detailed reporting:

- » Cat. 8 — Upstream leased assets — Emissions from leased assets are included in Cat. 4
- » Cat. 10, 11 & 12 — Processing, use and end-of-life treatment of sold products — Aurubis produces refined metals purchased, further processed and integrated into thousands of products by other undertakings in the value chain. Aurubis cannot accurately predict or influence the further processing of the refined metals from Aurubis, nor the use and end-of-life treatment of products containing them, and this is therefore excluded from the scope.
- » Cat. 13 — Downstream leased assets — Emissions from leased installations are included in Scope 1 and 2 as well as in Scope 3 under Cat. 9.
- » Cat. 14 — Franchises — Aurubis has no franchises.

## Total GHG emissions by Scope 1, Scope 2 and significant Scope 3 emissions (as per E1-6 AR 48)

	Unit	Retrospective	Milestones and target years (calendar years)				Annual % of target / base year
		2024/25	Base year	2025	2030	2050	
<b>Scope 1 GHG emissions</b>							
Gross Scope 1 GHG emissions	1,000 t CO <sub>2</sub> eq	501.55	-	-	-	-	-
Percentage of Scope 1 GHG emissions from regulated emission trading schemes	%	93	-	-	-	-	-
<b>Scope 2 GHG emissions</b>							
Gross location-based Scope 2 GHG emissions	1,000 t CO <sub>2</sub> eq	418.41	-	-	-	-	-
Gross market-based Scope 2 GHG emissions	1,000 t CO <sub>2</sub> eq	467.27	-	-	-	-	-
<b>Absolute Scope 1 and Scope 2 emissions (Total)<sup>1</sup></b>	1,000 t CO <sub>2</sub> eq	968.82	1,554	-	777	-	-
<b>Significant scope 3 GHG emissions</b>							
Total Gross indirect (Scope 3) GHG emissions	1,000 t CO <sub>2</sub> eq	4,513.84	-	-	-	-	-
1 Purchased goods and services	1,000 t CO <sub>2</sub> eq	2,596.99	-	-	-	-	-
2 Capital goods	1,000 t CO <sub>2</sub> eq	208.23	-	-	-	-	-
3 Fuel and energy-related activities	1,000 t CO <sub>2</sub> eq	321.90	-	-	-	-	-
4 Upstream transportation and distribution	1,000 t CO <sub>2</sub> eq	485.96	-	-	-	-	-
5 Waste generated in operations	1,000 t CO <sub>2</sub> eq	38.94	-	-	-	-	-
6 Business traveling	1,000 t CO <sub>2</sub> eq	0.99	-	-	-	-	-
7 Employee commuting	1,000 t CO <sub>2</sub> eq	3.96	-	-	-	-	-
9 Downstream transportation	1,000 t CO <sub>2</sub> eq	820.58	-	-	-	-	-
15 Investments	1,000 t CO <sub>2</sub> eq	36.29	-	-	-	-	-
<b>Relative Scope 3 emissions per ton of copper cathode<sup>2</sup></b>	CO <sub>2</sub> / copper cathode	4.1	6	-	4.5	-	-
<b>Total GHG emissions</b>							
<b>Total GHG emissions (location based)</b>	1,000 t CO <sub>2</sub> eq	5,433.81	-	-	-	-	-
<b>Total GHG emissions (market based)</b>	1,000 t CO <sub>2</sub> eq	5,482.66	-	-	-	-	-
<b>GHG intensity per net revenue<sup>3</sup></b>							
Total GHG emissions (location-based) per net revenue	t CO <sub>2</sub> eq/€	0.299	-	-	-	-	-
Total GHG emissions (market-based) per net revenue	t CO <sub>2</sub> eq/€	0.302	-	-	-	-	-

<sup>1</sup> Progress towards achieving the target is presented in more detail on a calendar-year basis in E1-4.

<sup>2</sup> Refers to internally produced copper cathodes.

<sup>3</sup> The calculation of GHG intensity per net revenue is subject to the same assumptions as the energy intensity per net revenue, as detailed in E1-5.

## E2 — Pollution

Aurubis is aware of the impacts of its business operations on the environment and places great importance on monitoring and managing environmental emissions. Air emissions in particular are a central topic. Particulate matter emissions have been significantly reduced in recent years through targeted technical actions and continuous improvement in production processes.

Environmental pollution, such as air emissions, is also an important issue in the supply chain. We therefore expect our business partners to handle the environmental impacts of their own operations responsibly, as detailed in the Business Partner Code of Conduct.

Air pollution, especially particulate matter and its impact on human health, represents a material negative actual impact for Aurubis smelter sites. Pyrometallurgical processes such as smelting and refining are associated with air emissions. The hotspot analysis in accordance with the Organization Environmental Footprint Sector Rules for copper production identified the ‘particulate matter’ impact category as a significant environmental impact in the context of air emissions — both in the upstream value chain and in our own operations. It includes both particulate matter emissions (PM) and precursor substances such as sulfur oxides (SO<sub>x</sub>), which contribute to secondary particulate matter formation. Aurubis applies the best available techniques to prevent and reduce air emissions.

### IROs identified as material for topic E2 (Climate change)

Sub-topic	IRO type	Name	Location in the value chain	Time horizon
Air pollution	Impact (negative, actual)	Particulate matter/impacts on human health	◀ ▲ ▶	■ □ □

◀ Upstream value chain   ▲ Own operations   ▶ Downstream value chain  
 ■ □ □ Short term   □ ■ □ Medium term   □ □ ■ Long term

Please refer to [IRO-1](#) for details on the method for identifying and assessing material IROs.

### E2-1 — Policies related to pollution

The Corporate Policy on Environmental Protection defines the fundamental principles and guidelines for ensuring that environmental protection standards are safeguarded throughout the Group and continuously optimized. It outlines areas of activity and responsibilities, defines information and reporting requirements, and regulates the duties of Corporate Environmental Protection as well as cooperation with local environmental officers and plant managers. The policy helps ensure that environmental regulations are complied with, environmental impacts are continuously reduced, and potential incidents are identified early and addressed effectively to prevent negative impacts on the environment and operations. It also addresses the implementation and advancement of environmental management systems such as ISO 14001 and EMAS, which also cover air pollution. We report additional information on a calendar-year basis in our [Environmental Report](#).

Our procurement principles for responsible sourcing of raw materials are clearly defined and documented in our Corporate Responsible Sourcing Policy. We communicate our requirements to our suppliers with our Code of Conduct for Business Partners. Agreeing to follow this code of conduct by our direct suppliers is a fundamental prerequisite for entering into a business relationship. This includes compliance with all relevant environmental laws, including particulate matter emissions, in their respective jurisdictions, thereby implicitly addressing these issues. Our Code of Conduct for Business Partners does not specifically cover incidents and emergencies, as their complexity varies and cannot be comprehensively addressed in a single document.

Please refer to [IRO-2](#) for a list of all the applicable policies and commitments.

### Policies related to the material IROs

Impacts	Policies
Particulate matter/impacts on human health	Aurubis Code of Conduct Corporate Environmental Protection Policy Aurubis Business Partner Code of Conduct Corporate Responsible Sourcing Policy

## E2-2 — Actions and resources related to pollution

The environmental standards for our production processes are defined in official permits and also include preventing and reducing air emissions in accordance with European regulations and their implementation in national law.

We employ the best available techniques and utilize innovative environmental protection technologies to minimize our environmental impact here. Since 2000, we have invested more than €1.1 billion in actions to improve environmental protection throughout the Group. We provide additional information in the

[Q Combined Management Report, Environmental protection.](#)

### Producing with new, innovative environmental protection technologies

An €85 million filter system in primary copper production (RDE) has been reducing diffuse emissions at the Aurubis Hamburg site since 2021. The project comprised closing roof openings on the primary smelter and connecting them to a powerful conduit and filter system. RDE uses new technologies that have been combined in revolutionary ways at Aurubis. The specially developed, needs-based control of the ridge turrets ensures efficient operations with large exhaust air volumes. This has already resulted in a 40% reduction in the diffuse emissions discharged from primary copper production at the Hamburg site. We are expanding the existing system with an additional investment of around €30 million. By doubling capacity in this way, we are again significantly boosting the facility's efficiency to 80%. Commissioning is scheduled for fiscal year 2025/26.

Along with copper, sulfur is one of the main components of the copper concentrates we use. Gaseous sulfur dioxide is produced when these concentrates are smelted, which is converted into sulfuric acid in the acid plant using a modern double conversion process. Compared to the industry average, the environmental impact of acidification driven by sulfur dioxide is significantly lower at Aurubis, as our life cycle assessments show. Emissions per ton of copper produced in primary production have been reduced by 88% since 2000.

### Certified environmental management systems

Our environmental performance is monitored using ISO 14001/EMAS-certified environmental management systems. These help us identify potential improvements and initiate corrective actions when deviations occur. All production sites operate an ISO 14001-aligned environmental management system. Aurubis AG in Hamburg and Lünen, as well as the sites in Avellino and Stolberg, are also EMAS-certified. With support from the Aurubis Operating System, we continuously analyze and optimize our production processes with a focus on environmental aspects.

### Life cycle assessments for our products

Life cycle assessments (LCAs) analyze the environmental footprint of Aurubis products throughout their entire life cycle. This enables us to track improvements over time, identify additional impact reduction areas, and compare the environmental performance of products. The LCA covers all activities required to fabricate the products from cradle to gate. This includes ore extraction, smelting and refining, transport, energy consumption and auxiliary materials. The assessments were undertaken in accordance with the 14040 and 14044 ISO standards for life cycle assessments. The impact categories cover a broad range of relevant environmental impacts and were all determined using established scientific methods. This assessment includes the environmental pollution caused by particulate matter. The environmental profiles of Aurubis products are reviewed by TÜV NORD CERT and published on the Aurubis website.

### Preventing environmental incidents and emergency situations

Environmental topics are continuously discussed across the Group, and employees receive training on relevant environmental issues. Comprehensive emergency plans and alarm and hazard prevention plans are in place for emergency situations and accidents. These plans outline essential precautions for preventing accidents and operational disruptions, and define actions aimed at avoiding hazards, such as air pollution, or limiting their impact to a minimum to protect our employees, neighboring communities and the environment. These plans are coordinated with the authorities, neighboring companies and public emergency services where indicated. Emergency drills are regularly carried out, documented and evaluated, and verify the effectiveness of these plans.

### Supply chain

We require our direct suppliers to agree to comply with and sign our Business Partner Code of Conduct, which also includes provisions on air quality control. For more information about our Business Partner Screening process, please see [Q G1-2](#).

### E2-3 — Targets related to pollution<sup>1</sup>

We are committed to producing with the smallest environmental footprint in our sector, and have set targets for our own operations as part of our corporate strategy:

#### 2030 target

-15 % specific dust emissions in g/t of multimetal copper equivalent (reference year 2018, calendar year)

Our emissions to air reduction target in our own operations is based on the calendar year rather than the fiscal year as such differs from the reporting period in accordance with ESRS. This is primarily because the legal reporting requirements for environmental data (e.g., E-PRTR) are based on the calendar year. This does not, however, compromise the quality and ambition of our targets in any way.

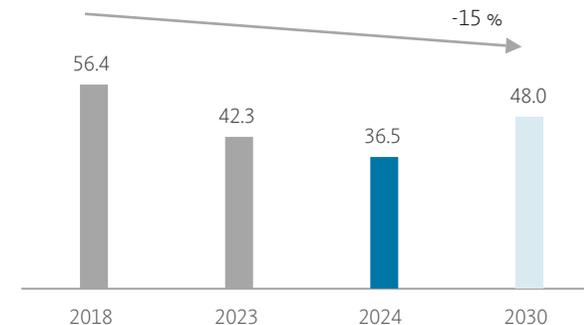
#### Targets — methodology and monitoring

Our Corporate Environmental Protection Policy targets reducing the environmental and health impacts associated with particulate matter emissions. We have therefore voluntarily committed to a 15 % reduction of specific particulate matter emissions per ton of multimetal production at our smelter sites. In 2024, dust emissions in multimetal production per ton of copper equivalent output were reduced by 35 % compared to 2018. The RDE project was a strong contributor to this success. This reduction lowers the release of various substances listed in the [Q Air pollutant emissions](#) table and actively contributes to improving our environmental footprint and air quality. Environmental performance is monitored and controlled using environmental KPIs, which are collected at the multimetal production sites at least once a year and externally verified by TÜV (Technical Control Board) NORD CERT. This verification is carried out in accordance with the provisions of the EMAS Regulation and includes detailed data reviews and site visits.

<sup>1</sup> Information relating to calendar years is not included in the auditor's scope.

### 2030 target: Dust emissions

in g/t multimetal copper equivalent



When setting our targets, we accounted for the transformation of the company from a copper producer to a multimetal producer. Our specific reduction targets and the associated reporting of specific emissions are exclusively based on our multimetal indicator, the copper equivalent. This calculation is based on an approach that has already been established at the European level through an EU project on life cycle assessment (environmental footprint) of organizations and products: the Organization Environmental Footprint and the Product Environmental Footprint. The copper equivalent describes all the metals Aurubis produces. It standardizes the entirety of our metal production using a weighting factor based on the respective average metal prices. The observation period for the relevant metals ranged from seven to nine years. To prevent the influence of value fluctuations, the average prices of the metals are fixed for the entire target time horizon. The calculation method was verified by external auditors from TÜV NORD CERT GmbH in 2021. The target was defined based on the expertise of internal specialists. External stakeholders were not directly involved.

We defined a comprehensive 2030 target for our supply chain, which is outlined in [Q S2-5](#). It comprises doubling the share of certified or audited sources of copper-bearing concentrates. The requirements placed on our suppliers as part of certification or auditing processes include the topic of environmental pollution.

For this reason, we did not formulate a separate 2030 target specifically aimed at reducing air pollution, as this aspect is already an integral part of the existing requirements.

## E2-4 — Pollution of air

### Air pollutant emissions

in kg	2024/25
SO <sub>x</sub>	4,091,732
CO	2,956,296
NO <sub>x</sub>	862,310
Benzene	1,483
Hg	90
Zn	6,418
Pb	2,215
Cu	4,386
Cd	84
As	311
Ni	61

The data will be collected and reported in this format for the first time in the 2024/25 fiscal year, and cannot therefore be compared to previous year data.

### Methods and significant assumptions

Monitoring emissions to air from all relevant sources from our equipment is defined in the environmental permits in accordance with the Industrial Emissions Directive and the Best Available Techniques for Non-Ferrous Metal Production (BAT Conclusions) reference document as well as their implementation in national law. Site-specific monitoring programs are approved and monitored by local authorities. This includes relevant emission sources, measurement methodology, frequency and assessment procedures. These requirements also set the data standards for air emissions reporting in the fiscal year.

Emission data is determined according to the best available data principle. Measurements (either continuous or periodic) are primarily used for directed sources. The pollutant amount is calculated by each site based on permit requirements. Every site submits the data via the Aurubis Infor reporting system.

Group-level diffuse emissions are determined based on estimates that take site-specific conditions and the best available data into account. According to regulations in Bulgaria and Spain, the sites in Pirdop and Berango are not subject to E-PRTR reporting requirements for diffuse emissions and are therefore not included in the Group-wide figures for diffuse emissions.

The resulting pollutant amounts per site are added together — provided they exceed the thresholds defined in Annex II of the E-PRTR — and form the Group-wide emission totals shown in the table.

## E3 — Water and marine resources

Water is an increasingly scarce resource, and using it responsibly is of central importance to us. Significant water withdrawals can occur in the upstream value chain, which may impact local water availability. This is why preventing water scarcity and ensuring sustainable resource use are part of our Business Partner Code of Conduct.

Water withdrawal in the upstream value chain has been identified as a material negative actual impact, particularly because the extraction and processing of ores require large amounts of freshwater. According to a study by KU Leuven [IRO-1](#), the environmental impacts are not defined by water consumption itself, but rather by the volume of water withdrawn — especially in regions affected by water scarcity. 39 % of global water production takes place in areas with high or medium water scarcity risk, particularly in Chile. Aurubis sources concentrates globally, including from regions affected by water scarcity.

### IROs identified as material for topic E3 (Water and marine resources)

Sub-topic	IRO type	Name	Location in the value chain	Time horizon
Water	Impact (negative, actual)	Water withdrawal — Impact on water scarcity in the upstream value chain		

No material IROs were identified for our own operations as part of the DMA. Please refer to [IRO-1](#) for details on the method for identifying and assessing material IROs.

### E3-1 — Policies related to water and marine resources

Our procurement principles for responsible sourcing of raw materials are clearly defined and documented in our Corporate Responsible Sourcing Policy. We communicate our requirements to our suppliers with our Business Partner Code of Conduct. Agreeing to follow this code of conduct by our direct suppliers is a fundamental prerequisite for entering into a business relationship. In this code, we require that they handle water responsibly. This includes complying with relevant environmental regulations and establishing and maintaining processes and procedures to prevent, mitigate and remediate impacts and risks — including those related to water use. Suppliers are also required to report any violations or increased risks to Aurubis.

Please refer to [9 IRO-2](#) for a list of all the applicable policies and commitments.

#### Policies related to the material IROs

Impacts	Policies
Water withdrawal — Impact on water scarcity in the upstream value chain	Aurubis Business Partner Code of Conduct Corporate Responsible Sourcing Policy

### E3-2 – Actions and resources related to water and marine resources

We conduct a systematic assessment of potential and actual negative impacts caused by our suppliers. As part of our Business Partner Screening process, this includes assessing potential or actual negative impacts related to water withdrawal caused by our suppliers that may not be adequately addressed. For more information about our BPS, please see [9 G1-2](#).

Aurubis evaluates the impacts of water use from cradle to gate using life cycle assessments for the majority of our products in accordance with ISO standards 14040 and 14044. The environmental impacts of Aurubis products are calculated using the Environmental Footprint assessment method based on 16 impact categories in order to align with the best scientific and industrial reporting practices. Water-related impacts are assessed under the “Water use” impact category. This is defined as water withdrawal potential (Available Water Remaining method) based on the inverse of the difference between the water availability per area and water demand per area. The impact category thus includes the topic of water withdrawal.

The environmental profiles of Aurubis products are independently reviewed by TÜV NORD CERT and the life cycle assessments are published on the Aurubis website.

### E3-3 — Targets related to water and marine resources

We defined a comprehensive 2030 target for our supply chain, which is outlined in [9 S2-5](#). It comprises doubling the share of certified or audited sources of copper-bearing concentrates. The requirements placed on our suppliers as part of certification or auditing processes include the topics of water withdrawal and water consumption. For this reason, we did not formulate a separate 2030 target specifically aimed at these topics, as this aspect is already an integral part of the existing requirements. The life cycle assessment supports the target but does not directly impact it. The target is not suited for measuring the impact of this action.

## E4 — Biodiversity and ecosystems

We continually work to reduce the environmental impact of our business activities and to ensure the environmentally sustainable production of our products. Conserving biodiversity is therefore an integral part of our responsibility. We have material impacts relating to the location-specific impacts in the upstream value chain in particular.

### E4-SBM-3 — Material impacts, risks and opportunities and their interaction with strategy and business model

No material IROs were identified for our own business area as part of the DMA. In the supply chain, the location-specific impact on biodiversity was identified as a material negative actual impact, especially given that mining processes significantly affect local flora and fauna. Even though just a small portion of global copper production takes place in high biodiversity risk areas, the low metal concentrations and high production volumes in opencast mining result in the movement of large material quantities. This has far-reaching impacts on biodiversity in the affected regions, according to a study from KU Leuven [9 IRO-1](#). Aurubis does not operate any mines.

### IROs identified as material for topic E4 (Biodiversity and ecosystems)

Sub-topic	IRO type	Name	Location in the value chain	Time horizon
Impact on extent and condition of ecosystems	Impact (negative, actual)	Location-specific changes through raw material mining	  	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>

 Upstream value chain
  Own operations
  Downstream value chain  
   Short term
    Medium term
    Long term

Please refer to [IRO-1](#) for details on the method for identifying and assessing material IROs.

#### E4-1 — Transition plan and consideration of biodiversity and ecosystems in strategy and business model

Biodiversity was not identified as a central topic for own operations as part of the materiality analysis. It is relevant primarily in relation to upstream mining activities. We have therefore not yet developed a transition plan.

#### E4-2 — Policies related to biodiversity and ecosystems

Our procurement principles for responsibly sourcing raw materials are clearly defined and documented in our Corporate Responsible Sourcing Policy. We communicate our requirements to our suppliers with our Business Partner Code of Conduct. Agreeing to follow this code of conduct by our direct suppliers is a fundamental prerequisite for entering into a business relationship. This includes protecting natural ecosystems and preventing their degradation, including preventing illegal deforestation. Appropriate due diligence measures are to be taken when a business partner’s value chain poses a risk of destroying natural forests or ecosystems.

Please refer to [IRO-2](#) for a list of all the applicable policies and commitments.

### Policies related to the material IROs

Impacts	Policies
Location-specific changes through raw material mining	Business Partner Code of Conduct Corporate Responsible Sourcing Policy Corporate Policy on Environmental Protection

#### E4-3 — Actions and resources related to biodiversity and ecosystems

As part of our Business Partner Screening process (BPS), we conduct a systematic assessment of potential and actual negative impacts caused by our suppliers. This includes assessing potential or actual negative impacts on the environment caused by our suppliers that may not be adequately addressed. For more information about our BPS, please see [G1-2](#).

Aurubis evaluates the impacts of land use from cradle to gate. We regularly conduct life cycle assessments for our products in accordance with ISO 14040 and 14044. Land use is one of the impact categories assessed and is primarily impacted by raw material extraction and concentrate production.

The environmental profiles of Aurubis products are reviewed by TÜV NORD CERT and the life cycle assessments are published on our website.

#### E4-4 — Targets related to biodiversity and ecosystems

We defined a comprehensive 2030 target for our supply chain, which is outlined in [S2-5](#). It comprises doubling the share of certified or audited sources of copper-bearing concentrates. The requirements placed on our suppliers as part of certification or auditing processes include standards for biodiversity conservation and responsible land use. For this reason, we did not formulate a separate 2030 target specifically aimed at this topic, as this aspect is already an integral part of the existing requirements. The life cycle assessment supports the target but does not directly impact it. The target is not suited for measuring the impact of this action.

## E5 — Resource use and circular economy

Aurubis is one of the largest copper recyclers worldwide. The circular economy is therefore inextricably linked with our business model. The processing of virgin resources is equally important, however. Our objective is to efficiently recover as many metals and other usable materials as possible — such as sulfuric acid and iron silicate — from the raw materials used.

Given the central role of the circular economy in our business model, we identified corresponding impacts in our materiality assessment. Although we use a high proportion of recycled resources, using copper concentrate remains essential for our production. The extraction of primary raw materials has negative impacts for people and the environment, however. The high recyclability of copper products is a positive impact from our business model. This supports the downstream value chain, since copper and copper products for current and future technologies, such as for the energy transition and e-mobility, are centrally important. The efficient reuse of process residues from our metallurgical processes is another positive effect from our circular business model. This enables us to recover valuable metals like gold, silver, lead, nickel and tin along with platinum group metals. This is how we contribute to resource efficiency and close the value chain for copper and other metals.

For more information on the role of recycling in our business model, please refer to [Q Combined Management Report, Business model](#).

### IROs identified as material for topic E5 (Resource use and circular economy)

Sub-topic	IRO type	Name	Location in the value chain	Time horizon
Resource inflows, including resource use	Impact (negative, actual)	Use of primary raw materials in own operations	◀ ▲ ▶	■ □ □
Resource outflows related to products and services	Impact (positive, actual)	High recyclability of copper products	◀ ▲ ▶	■ □ □

Sub-topic	IRO type	Name	Location in the value chain	Time horizon
Resource outflows related to products and services	Impact (positive, actual)	Resource efficiency of by-products	◀ ▲ ▶	■ □ □

◀ Upstream value chain   ▲ Own operations   ▶ Downstream value chain  
 ■ □ □ Short term   □ ■ □ Medium term   □ □ ■ Long term

Please refer to [Q IRO-1](#) for details on the method for identifying and assessing material IROs.

### E5-1 — Policies related to resource use and circular economy

Our core business is processing metal-containing raw materials. We use both primary materials like concentrates as well as recycling materials. The systematic combination of primary and secondary raw materials is deeply integrated into our operational processes and is part of our corporate strategy. By recovering and reusing metals from secondary sources, we contribute to conserving natural resources and thus promote the circular economy [Q SBM-1](#).

The Corporate Environmental Protection Policy provides a framework for our environmental activities. It emphasizes that processed raw materials and intermediate products should be returned to the economic cycle as fully as possible and stipulates that unavoidable waste must be properly recycled or disposed of in an environmentally friendly way. The policy also supports compliance with the applicable statutory provisions in all the countries in which Aurubis operates.

Our procurement principles for the responsible sourcing of raw materials are clearly defined and documented in our Corporate Responsible Sourcing Policy. We communicate our requirements to our suppliers with our Business Partner Code of Conduct. Agreeing to follow this code of conduct by a direct supplier is a fundamental prerequisite for entering into a business relationship. Recycling is a top priority for Aurubis. We encourage our business partners to fully utilize their recycling potential and to promote recycling in their business activities.

Please refer to [Q IRO-2](#) for a list of all the applicable policies and commitments.

**Policies related to the material IROs**

Impacts	Policies
Use of primary raw materials in own operations	Company strategy Aurubis Business Partner Code of Conduct Corporate Environmental Protection Policy
High recyclability of copper products	Aurubis Business Partner Code of Conduct Corporate Environmental Protection Policy
Resource efficiency of by-products	The positive impacts are based on technical copper production processes that generate by-products. Using state-of-the-art equipment and process controls ensures the maximum recovery of valuable materials from primary and secondary raw materials. Establishing policies for technological processes that are based on chemical and physical principles is not relevant.

**E5-2 — Actions and resources related to resource use and circular economy**

We continue to invest in expanding our recycling activities with around two-thirds of our investment funds going to this area. In fiscal year 2024/25, we started the gradual commissioning of the first stage of our US plant for processing complex recycling materials, with the ramp-up phase to follow in 2026. Together with stage two, the recycling smelter in Augusta, Georgia, will process up to 180,000 t of recycling material per year, which will reduce scrap exports from the US and the CO<sub>2</sub> emissions associated with them.

In fiscal year 2023/24, we launched the Complex Recycling Hamburg (CRH) project in Hamburg, Germany. This project will enable us to process up to 30,000 t of recycling material and metallurgical intermediates per year. With an investment of €190 million, CRH will significantly improve metal recovery from copper production intermediates, which will increase recycling capacity and efficiency. The topping-out ceremony took place in May 2025, and the official inauguration is scheduled for the 2025/26 fiscal year.

We are also investing in advanced recycling technologies at other sites. In fiscal year 2024/25, we commissioned the BOB bleed treatment plant for recovering nickel and copper in Olen, Belgium, to further expand our recycling capabilities, for example.

We also use recycling raw materials at our primary smelters in Hamburg (Germany) and Pirdop (Bulgaria). The primary smelters chiefly utilize copper concentrates but can also use the waste energy from these concentrates to melt down copper scrap and other recycling materials carbon free without any additional primary energy input. This enables particularly energy-efficient processing.

As part of our activities to promote the circular economy, we have established closing-the-loop partnerships with customers. These partnerships go beyond solely the sale of our products and include taking back recycling materials. Our production units provide tailored solutions for taking back the recycling materials that accumulate from the processing of copper products and other metals. This occurs along various value chain stages of our customers and their customers and offers options such as selling production residues or copper scrap to Aurubis and receiving refined copper in return. Our network also enables us to tackle metallurgical challenges and serve customers across a wide range of industries.

Another important part of our support for the circular economy is our targeted production of iron silicate, a synthetic mineral comparable to natural minerals from quarries. It is used in key areas of construction, such as road construction, hydraulic engineering, the cement and concrete industry and other applications, as a substitute for primary building materials. The use of iron silicate reduces the demand for primary raw materials, closes the loop and increases resource efficiency, thus lowering the CO<sub>2</sub> footprint of the construction sector. It lowers the CO<sub>2</sub> footprint of construction products and prevents the loss of valuable resources from our industry that would otherwise end up in landfills.

For more information on our strategic projects, please refer to [Combined Management Report, Strategic direction](#).

**E5-3 — Targets related to resource use and circular economy**

Our goal is to offer the entire value chain circular economy solutions. To this end, we set the following target for our own operations as part of our corporate strategy:

**2030 target**

Up to 50 % average recycled content in copper cathodes

### Targets — methodology and monitoring

The target achievement level is determined based on data from the Group’s internal controlling systems. The calculation involves dividing the aggregated use of secondary raw materials across the Group by the total raw materials processed during a specified time period. This time period corresponds to the respective fiscal year and the relevant data is collected and evaluated as at the September 30 reporting date. The target is voluntary and not legally mandated. It refers to increasing the recycled content, which lowers the share of primary raw materials used. Ore deposits cannot be renewed through human activity. However by increasing the use of recycling materials, we are making an important contribution to conserving these limited resources and reducing their consumption. The target applies to the respective fiscal year and is not the average of multiple years.

The recycled copper content in our copper cathodes was 45 % across the Group for fiscal year 2024/25 (previous 2023/24 year: 44 %). In the coming years, we plan to further increase both the volume and the complexity of recycled content and leverage Group-wide synergy effects, and so achieve our 2030 target of up to 50 % average recycled content in copper cathodes. By increasing the share of recycled materials, we are contributing to the EU Circular Economy Strategy under the Green Deal.

We defined a comprehensive 2030 target for our supply chain, which is outlined in [9 S2-5](#). It comprises doubling the share of certified or audited sources of copper-bearing concentrates. The requirements placed on our suppliers as part of certification or auditing processes include the topic of resources. For this reason, we did not formulate a separate 2030 target aimed specifically at this topic, as the aspect is already an integral part of the existing requirements.

### E5-4 — Resource inflows

At Aurubis, resource inflow consists of the total volume of materials used in the production processes of our globally consolidated activities and the auxiliary materials used in the production processes. To calculate the reported resource inflows, we only consider metal-containing materials and exclusively those sources from outside the smelter network, ensuring that internal Group flows are excluded and preventing double counting. Biological materials are not included in our reporting, as they represent only a minimal fraction of our overall inflows.

### Allocation of resource inflows<sup>1</sup>

Total weight of metal-containing inflows (throughput, in dmt)	2024/25
Primary	2,498,401
Secondary	864,709

<sup>1</sup> The proportion of primary and secondary resource inflows cannot be compared to the recycling rate, for example of the cathode. The higher resource inflow from primary sources (concentrates) results from lower copper content on average compared to secondary sources (recycling material).

### Recycled content of products (%)

Products	2024/25
Copper cathodes	45 %
Aurubis Rod (continuous cast wire rod)	38 %
Aurubis FOXROD (oxygen-free copper wire)	70 %
Aurubis SHAPES (continuous cast shapes)	36 %
Aurubis BARS & PROFILES (bars & profiles)	70 %
Gold	33 %
Silver	58 %
Tin	100 %
Nickel from nickel sulfate	60 %
Lead	95 %
Platinum group (PGM) — platinum and palladium	67 %

### Methods and significant assumptions

The data presented in the “Recycled content of products” table was calculated based on material consumption data from the sites. The quantities and metal contents of the materials used were derived from calculations using SAP data, which originates from various laboratory and test point systems connected to the SAP system. A central assumption in the calculations is that all materials are categorized, regardless of whether they are primary or secondary. This classification was coordinated with TÜV.

The calculation method for recycling content was revised in the 2024/25 fiscal year to more precisely reflect the actual production conditions and to ensure a closer alignment with the ISO 14021 standard.

Recycling content refers to the content of recycled material contained in a product. This content does not directly reflect the content of recycled raw materials used as input materials, since technical metal losses occur during the production process. These losses vary by site, input stream and type of metal, so certain materials exhibit higher losses than others. The revised calculation is now based on the quantity of post-consumer and pre-consumer scrap that is brought into the smelter network, after deducting process-related metal losses. These losses had not been accounted for in the previous method.

Furthermore, the assessment boundary was changed from an organizational to a product-related boundary to enable statements on product-specific processes and life cycle inventories.

Material that is diverted from a waste stream and reused in the same process that produced it (“run-around scrap”) is excluded from the recycling content calculation. In accordance with the definition of ISO 14021, material that is recycled in another process in order to recover metals is now classified as pre-consumer material, however. This adjustment positively impacts the overall recycling rate because it better reflects the actual material recovery practices in our integrated smelter network.

The applied calculation method, underlying data and established recycling content are subject to an independent audit by TÜV NORD CERT for the 2024/25 fiscal year. Auditing has started but is still in the review process and was not completed by the report’s publication date.

Unlike the data processed for products, only external resource inflows into the Group are considered for resource inputs. Internal cycles in which materials are recirculated in various processes at Aurubis are not included. Additionally, only actual inflows are recorded. Losses that occur during the process up to the fabrication of the product are not considered. It is important to note that the two corresponding indicators in the “Allocation of resource inflows” table only include a percentage of metal. These values are therefore significantly higher than the indicators relevant for management purposes, which are reported in [Combined Management Report, Economic Report](#).

## E5-5 — Resource outflows

Our products are fabricated from non-ferrous metals. These materials are reusable and can be recycled over and over again.

Since we are a manufacturer of intermediate products and not finished consumer goods, aspects such as product durability, dismantling, reprocessing, refurbishing and repairability are not applicable. Likewise, the biological cycle or optimization of product use through other circular business models is not applicable.

Metal recycling has environmental, economic and social value. That is why metals from end-of-life products have been recycled on a large scale and with high recovery rates for many years. Copper and other metals possess inherent circular properties and are considered permanent materials, meaning they remain indefinitely available for the needs of society and for product applications. Copper can be recycled endlessly. Aurubis produces materials and intermediate products. The actual recycling rate at the end of a product’s life depends on its final production application.

For more information and KPIs related to our main products, please refer to [Combined Management Report, Economic Report](#).

## S1 — Own workforce

Success and growth are based on our employees’ expertise and commitment, so we prioritize health and safety and firmly integrate corresponding measures into our operating processes. We value a fair and ethical work environment where mutual respect and equal treatment are a matter of course. With a supportive company culture, we create conditions for employees to further develop their skills and contribute innovative ideas.

### S1-SBM-3 — Material impacts, risks and opportunities and their interaction with strategy and business model

We define “own workforce” as anyone who is directly employed at Aurubis within the context of a formal employment contract and who receives compensation and benefits. Non-employee workers include temporary workers and employees of external companies at our sites who contribute to the value chain. Our undertaking’s workforce includes those who are covered by collective agreements and those who are not (the latter especially in managerial positions), both full-time and part-time, as well as apprentices and interns. Workers are employed in either commercial or industrial roles.

Our employees are important to us, which is why we offer contractually secure jobs and adequate wages. All European Aurubis sites have employee representation and structured processes that ensure social dialogue between Aurubis and the workforce. We promote diversity in the company as well as ongoing training for employees.

The nature of the industry leads to increased health and safety risks at our production sites that are inextricably linked with the operational circumstances of industrial production and pose a continuous risk. This could potentially cause long-term health risks due to dust and emissions. Continuous monitoring and protective measures are necessary to minimize impacts. We take this seriously and invest in a healthy and safe working environment for our employees and everyone on the premises by implementing a comprehensive health and safety management system that includes protective equipment, safety measures, training and emergency plans.

There are currently no indications that climate change negatively influences human rights in our operations. No incidents of forced labor or child labor were identified either. Aurubis operates in the EU and the US, so in regions with stringent work regulations and strict enforcement. These legal conditions significantly reduce the likelihood of such violations in our operations. We are committed to the highest ethical standards and continuously monitor compliance with labor laws.

Please refer to [Q IRO-1](#) for details on the method for identifying and assessing material IROs.

**IROs identified as material for topic S1 (Own workforce)**

Sub-topic	IRO type	Name	Location in the value chain	Time horizon
Working conditions	Impact (positive, actual)	Offering current and potential employees secure jobs	◀ ▲ ▶	■ □ □
Working conditions	Impact (positive, actual)	Paying adequate wages to employees	◀ ▲ ▶	■ □ □
Working conditions	Impact (positive, actual)	Promoting and ensuring social dialogue, works council, freedom of association and collective bargaining within Aurubis' own workforce	◀ ▲ ▶	■ □ □

Sub-topic	IRO type	Name	Location in the value chain	Time horizon
Working conditions	Impact (positive, actual)	Providing healthy and safe working conditions	◀ ▲ ▶	■ □ □
Working conditions	Impact (negative, actual)	Generally higher health and safety risks in production facilities	◀ ▲ ▶	■ □ □
Working conditions	Impact (negative, potential)	Employees could suffer from long-term adverse physical effects of dust and emissions in production facilities	◀ ▲ ▶	■ □ □
Equal treatment and opportunities for all	Impact (positive, actual)	Fostering an inclusive environment by offering equal opportunities for all groups, ensuring diversity and equity at every level	◀ ▲ ▶	■ □ □
Equal treatment and opportunities for all	Impact (positive, actual)	Continuous education for current and potential employees to enable working for Aurubis and/or other companies	◀ ▲ ▶	■ □ □

◀ Upstream value chain ▲ Own operations ▶ Downstream value chain  
 ■ □ □ Short term □ ■ □ Medium term □ □ ■ Long term

**S1-1 — Policies related to own workforce**

As a production undertaking, we focus on safe working conditions and promote equal treatment and opportunities for all. Our principles are outlined in policies that include guidelines and commitments and are enforced uniformly for the undertaking's entire workforce.

The health of our own employees is a central issue for us. We have established health and safety requirements in our Occupational Health and Safety Policy, which is aligned with international standards such as ISO 45001:2018. We strive for Vision Zero to eliminate work-related accidents and illnesses. All production sites are certified in accordance with ISO 45001:2018.

Human rights are essential for us, and our policies prohibit human trafficking, forced labor, and child labor. We promote equal opportunity and diversity and take a stand against discrimination and harassment. Our Diversity Commitment prohibits discrimination of any kind pursuant to EU regulations and national laws.

Our Human Rights Officer monitors, investigates and documents the occurrence of human rights violations and processes for recording them. The Aurubis Code of Conduct guides our internal procedures and reflects our commitment to responsible business activity. During the reporting year, we introduced the Future-Oriented Employer Commitment emphasizing secure employment, adequate wages, and work-life balance. There are currently no specific legal obligations related to inclusion or assistance measures.

Our policies and commitments are aligned with recognized international standards [IRO-2](#).

**Policies related to the material IROs**

Impacts	Policies
Offering current and potential employees secure jobs	Code of Conduct
Paying adequate wages to employees	Future-Oriented Employer Commitment
Promoting and ensuring social dialogue, works council, freedom of association and collective bargaining within Aurubis' own workforce	Code of Conduct
Providing healthy and safe working conditions	Corporate Occupational Health and Safety Policy Corporate Human Rights Policy
Generally higher health and safety risks in production facilities	Corporate Occupational Health and Safety Policy
Employees could suffer from long-term adverse physical effects of dust and emissions in production facilities	Corporate Occupational Health and Safety Policy
Fostering an inclusive environment by offering equal opportunities for all groups, ensuring diversity and equity at every level	Diversity Commitment Corporate Human Rights Policy Code of Conduct
Continuous education for current and potential employees to enable working for Aurubis and/or other companies	Code of Conduct

Please refer to [IRO-2](#) for a list of all the applicable policies and commitments.

**S1-2 — Processes for engaging with own workers and workers' representatives about impacts**

We promote social dialogue with our employees through structured processes and collaboration with works councils and unions at all European sites. There is no works council at the new site in the US, though employee assemblies are held monthly. Social dialogue allows us to incorporate the perspectives of our workforce in company decisions and take actual and potential impacts on employees into consideration. The workforce is regularly included at site level starting in the planning or suggestion phase, and this continues in order to ensure permanent collaboration. In countries with works councils and unions, employees elect representatives to advocate for their interests with the employer and to guarantee compliance with local laws.

We gain valuable insights into the perspectives of the national and international workforce through European Works Councils (EWCs) and the General Works Council Assembly in Germany. International dialogue among the EWC members facilitates knowledge transfer, which can lead to continuous improvements such as reviews of HR policy and joint obligations to improve working conditions.

**S1-3 — Processes to remediate negative impacts and channels for own workers to raise concerns**

We have a clear process for reacting to incidents that have negative impacts, such as health and safety incidents, human rights violations, and discrimination. If such a case is confirmed, it is formally documented and assessed by the HR or Compliance department. Depending on the incident, other departments like Health & Safety may be included as well. These teams analyze the facts, identify the causes, and take corrective measures if necessary. Please refer to [S1-17](#) and [G1-1](#) for more details.

To safeguard the effectiveness of the measures, we systematically monitor every step taken, both to solve the immediate problem and to encourage long-term prevention and improvement. Employees are encouraged to express concerns without fear of repercussions.

Aurubis maintains open communication channels, which include reports via HR business partners, the local works council, or the local or global Discrimination Officer. A whistleblowing system has also been implemented and is available in all Group languages. This platform is open to all employees and was developed into a digital platform during the reporting year to improve accessibility and trust. It guarantees

anonymity and legal protection for all whistleblowers. Every tip, whether it involves corruption, discrimination or supply chain violations, is taken seriously and investigated. Aurubis calls on all employees to report credible concerns via the secure and anonymous whistleblowing system available around the clock on our website, as outlined in the rules of procedure. More information about the whistleblowing system is available in [9 G1-3](#).

### **S1-4 — Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions**

Aurubis follows a comprehensive concept for managing material impacts on the undertaking's workforce. This begins with a thorough analysis of the impacts followed by targeted actions for improvement, which are outlined by topic in the following sub-sections. The effectiveness of these actions is reviewed continuously.

#### **Health and safety**

At Aurubis, protecting the health, safety and productivity of all employees at the sites is a central focus. The Health & Safety Group function (G-H&S) reports directly to the Executive Board and sets Group-wide safety standards. All production sites are certified in accordance with ISO 45001. The Richmond (US) site will be certified after production starts. Every person who enters our sites is registered. Temporary workers and employees of external companies are briefed on risks, protective measures, rules of conduct, and what to do in an emergency at the specific site before they start work.

To minimize safety risks, we conduct extensive risk assessments that cover both routine operations and special tasks such as maintenance. All incidents are reported to G-H&S, as well as directly to the COOs in the case of lost shifts, and then communicated to the entire Executive Board. Local teams investigate each case to identify technical, organizational or behavior-based causes. The insights gathered are shared throughout the Group. This also applies to incidents with temporary workers and employees of external companies, who are subject to the same reporting and assessment standards.

#### **TOGETHER transformation program**

A tragic fatal accident occurred in May 2023, leading to the initiation of the TOGETHER transformation program. The program objective is to establish a safety culture promoting personal responsibility and

improving work and process safety by 2026 with the purpose of preventing serious accidents and consistently guaranteeing all employees' safety. Gap assessments were completed for all sites during the past fiscal year to zero in on potential for improving work and process safety. The results showed that our current approach is strongly based on rules. Nevertheless, we are convinced that a sustainable safety culture does not come from regulations alone, but is supported by being proactive, learning from each other, and maintaining an open error culture. Three central action areas were developed, which we are implementing as part of TOGETHER: Leadership and establishing safe behaviors, risk management, and safe site processes together with effective safety management instruments and processes.

A key element of our TOGETHER program is targeted training and coaching for employees at all levels of the hierarchy. The Hamburg plant has already successfully conducted these coaching sessions and concluded the pilot phase in June 2025. In fiscal year 2024/25, the program's implementation phase was expanded to include additional sites. Workshops and training for managers and Aurubis coaches will be the focus until the end of the calendar year. The experience gathered in Hamburg is being incorporated into the worldwide roll-out and contributes to reinforcing the safety culture at Aurubis. An external consultancy is supporting us during the entire project, particularly in developing methods and instructing internal trainers.

#### **Supplier Days**

Sites like Pirdop (Bulgaria) and Richmond (US) host annual safety days to raise the awareness of employees and contractors for health and safety. Safe working methods derived from topics related to everyday work are clearly illustrated in a variety of programs.

#### **Preventative care, shift work, and mental well-being**

We provide routine health exams and occupational checkups to employees at all sites to promote health in the workplace. In-house plant doctors are available in Hamburg and Pirdop, while external occupational physicians conduct checkups at other sites. Additional offers include flu vaccinations, preventative checkups, addiction prevention, and cardiovascular health support.

Shift work plays a key role in our business activities and is crucial for keeping our processes running smoothly. Aurubis is aware of the possible negative impacts that shift work can have on employee health and well-being, so we offer reduced weekly working hours for our shift workers in Germany starting at age 55, pursuant to the collective agreement for the chemical industry.

Every employee receives personal protective equipment, and respiratory protection systems are provided as needed that can be used during the entire shift without breathing resistance or strain on the circulatory system.

Aurubis prioritizes its employees' mental well-being and has offered mental health consultations at the Hamburg, Lünen and Pirdop sites since January 2022. These consultations, conducted by an external institute, cover professional and personal issues and are a central element of our workplace health concept.

### Adequate wages

The Aurubis collective agreements guarantee all employees fair, competitive and adequate compensation. In addition to following legal requirements, country-specific and regional compensation systems are taken into consideration as well. Entitlements to additional payments or bonuses are outlined in employment contracts. The relevant regulations come from either local collective agreements, company agreements for employees under collective agreements, or Group-wide policies for managers.

### Collective bargaining coverage and social dialogue

The majority of our employees are covered by collective agreements whose compensation is oriented to industry standards. Legal entitlements, for example paid time off for educational pursuits at the sites in Germany, Belgium, Italy and Spain, are respected without limitation, and works councils and unions represent employee interests.

For employees not covered by collective agreements, especially management, Aurubis applies Group-wide compensation policies based on external benchmark data. This system ensures uniform compensation practices across the undertaking and accounts for the local work environment and legal requirements at the same time.

In addition to fixed salaries, Aurubis provides a package of social benefits that contribute to financial security and well-being. This includes health insurance, pension schemes, paid sick leave, and parental leave prescribed by EU and national law. In the US, where these benefits are not prescribed by law, Aurubis offers them voluntarily to ensure a supportive, uniform employment experience in all regions.

### Diversity and equal opportunity

Aurubis fosters an inclusive work culture and counters unconscious bias with targeted training and measures to raise awareness. All available employees participate in unconscious bias training annually to bring attention to topics of diversity. This is also integrated in the onboarding process so that new employees, those who have been absent due to long-term illness, or employees returning from parental leave can complete the training as well. Furthermore, we provide employees with an e-learning course on age diversity and anti-bullying. Employees involved in application processes participate in training to learn how they can support equal opportunity for every individual. The training is accessible to every employee on the intranet.

Our Women4Metals (W4M) initiative strives to make the metals industry more appealing to women. Since its founding by female employees in October 2022, it has opened up to external companies and associations too. We were nominated for the Impact of Diversity Award in the “Women in STEM/MINT” category in spring 2025. Apart from existing offers like an internal peer mentoring program and monthly digital lunch events, the external event “Take courage — against all odds” took place in February 2025 at a partner company in Germany. W4M offers formats such as cross-mentoring and the interactive W4M Metals Voices dialogue. The initiative now has over 400 members in the Group and 100 external partners.

### Training and skills development

We invest in high-quality apprenticeship training and forward-looking qualification programs to prepare the undertaking's workforce for current and future challenges. The HR department plays a central role, working closely with the divisions to align development measures with specific needs and to support the undertaking's growth.

Annual Group-wide analyses of staffing needs and training help Aurubis identify qualification gaps and development opportunities for employees. Performance reviews and personnel planning promote specialist skills and leadership potential at all levels. A structured qualification program comprises technical training, personal development, and digital learning. The Corporate Learning Academy provides internal courses and resources for self-guided learning, supported by loaner laptops for employees who do not have regular computer access.

Talent development is supported further by initiatives like the O-Track (Orientation Track) program, which supports participants on career paths to becoming managers, experts or project managers. The program includes workshops, coaching and digital tools and culminates in personalized development plans for the participants.

We offer micro-learning modules, peer-led seminars, and mentoring programs to encourage knowledge sharing and support cross-functional understanding. The mentoring program kicked off in 2022 connects experienced mentors and mentees to support personal and professional development over a period of 12 months.

In fiscal year 2023/24 the Afterwork Campus was brought to life to expand existing learning options. The platform provides access to 750 diverse courses in German and English and is available to all employees regardless of their educational background. The pilot phase will continue until the end of the 2025 calendar year; the plan is to continue the initiative if it is successful. In addition, Aurubis introduced the Semigator platform to simplify registration for continuing education courses. With 60,000 courses at their fingertips, employees can find and register for training options quickly and conveniently. This solution supports personal and professional development and demonstrates Aurubis' commitment to lifelong learning and digital innovations.

### The Copper Mark

With the Copper Mark certification at our sites in Hamburg, Lünen and Stolberg (all in Germany), Beerse and Olen (both in Belgium), and Pirdop (Bulgaria), we have had our approach to respect for human rights and labor and social standards in our own operations audited and confirmed in accordance with Copper Mark criteria.

## S1-5 — Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

### Adequate wages

Our ambition is to offer a work environment for close collaboration, and we promote diversity and commitment. We passionately work for the progress of the undertaking and society. We have set the following target for our operations as part of our company strategy:

### 2030 target

100 % of our employees receive adequate wages.

Aurubis is committed to respecting its employees and considering their interests. In addition to complying with legally prescribed minimum wages, we guarantee stable working conditions and fair and adequate compensation for all employees. The undertaking strives for a target level based on compensation that exceeds the minimum wage and that corresponds with or surpasses the benchmark indicated on recognized data platforms like WageIndicator. This aligns with our commitment as a future-oriented employer and with the Aurubis Code of Conduct.

### Targets — methodology and monitoring

In 2025 we expanded the target of ensuring adequate wages for all employees at all sites in the long term as part of the undertaking's strategy update. This target is based on comparisons, started in 2024, with recognized international benchmarks like WageIndicator. The target was defined by internal experts.

To support our target, this year we implemented a new formal process for collecting, analyzing and reporting data that extends from the site HR level to the Group HR level. This structured approach guarantees that wage development is recorded precisely and consistently in all regions, without significant data limitations or assumptions. This enables us to monitor annual progress and ensure the transparency of compensation practices in all countries with operating sites. Our target is absolute and reflects our strong internal commitment. In the fiscal year reported, we successfully achieved our 2030 target of guaranteeing adequate wages for 100 % of our employees.

### Health and safety

Our ambition is to prevent work-related accidents, injuries and illnesses. We have set the following target for our operations as part of our company strategy:

### 2030 target

LTIFR <1.0

Aurubis strives to prevent work-related accidents and ensure a safe work environment for all employees, so we adapted our 2030 target in fiscal year 2024/25. It now applies to all employees — temporary workers and employees of external companies in addition to the undertaking's workforce. By using this safety metric

for all individuals at our sites, we emphasize that the same safety standards apply to everyone — regardless of employment status. Our target is to reduce the lost time injury frequency rate (LTIFR), which measures work accidents with at least one lost shift per 1 million working hours, to less than 1.0 by 2030.<sup>1</sup> With these changes, we want to ensure that everyone working at our sites is subject to, and benefits from, the same safety standards. This also underscores our commitment to a safe work environment. The target was defined by internal experts. Our LTIFR is currently 2.90.

**Targets — methodology and monitoring**

Our health and safety target is absolute and is based on standardized calculations following a uniform methodology. This guarantees that the data is reliable and comparable over time. The lost time injury frequency rate (LTIFR) is still an extremely effective measure of our safety performance and reflects our ongoing drive to achieve our Vision Zero target.

**Diversity and equal opportunity**

Our ambition is to create a work environment for close collaboration and to promote diversity and commitment. We work to ensure the progress of the undertaking and society. We have set the following target for our operations as part of our company strategy:

**2030 target**

100 % of the relevant<sup>2</sup> employees receive unconscious bias and anti-discrimination training.

Our goal is to make sure that factors such as race, ethnic or social origin, gender or gender identity, religion or worldview, disability, age, family status, and sexual orientation have no influence on hiring decisions, compensation, career development, or interpersonal interactions. We categorically reject all forms of discrimination. We believe that diversity in the workforce promotes the exchange of knowledge, contributes different perspectives, and maintains an environment where open and trusting collaboration thrive.

<sup>1</sup> The target was adjusted in fiscal year 2024/25. The previous target was LTIFR ≤ 1.0.

<sup>2</sup> The term “relevant employees” refers to all employees who can be reached. Those with long-term illness or employees on parental leave are not included.

**Targets — methodology and monitoring**

We offer diversity and anti-discrimination training to enhance our employees’ awareness. This training is continuously monitored by the system during the reporting year, for instance through email reminders. Both training modules have also been integrated into our onboarding process to assure that new hires and employees returning after long-term illness or parental leave complete the training as well. We thus successfully achieved the 2030 target in fiscal year 2024/25. The target was defined by internal experts in coordination with other internal stakeholders.

**Training hours**

Our ambition is to provide high-quality vocational training and invest in forward-looking qualifications for employees. We have set the following target for our operations as part of our company strategy:

**2030 target**

100 % fulfillment of the training allotment in hours (training allotment: 18 hours per year for each employee)

**Targets — methodology and monitoring**

To ensure we have sufficiently qualified employees, we compare our staffing needs with our apprenticeship, onboarding and career development offers each year. Moreover, we sound out the need for employee qualifications and succession planning for various positions in annual employee talks and the annual personnel planning process to develop and secure specialist and management skills. We adapted our methodology to align with ESRS requirements during the past fiscal year [Q S1-13](#). The target is an absolute target that applies to all our employees. The degree of fulfillment this year is 29 %.

**S1-6 — Characteristics of the undertaking’s employees**

Our total number of employees broken down by country is provided in [Q Sites and employees](#). The following countries are considered countries with significant employment (at least 50 employees and at least 10 % of the undertaking’s entire workforce):

Country	Number of employees (head count)
Germany	4,207
Bulgaria	1,021
Belgium	1,216

### Number of employees by gender

Gender	Number of employees (head count)
Male	6,127
Female	1,063
Other <sup>1</sup>	N/A
Not reported	N/A
<b>Total employees</b>	<b>7,190</b>

<sup>1</sup> We currently do not record a third gender in the Group globally. We will review the relevance of the category for future external reporting.

### Number of employees by contract type,<sup>1</sup> broken down by gender<sup>2</sup>

	FY 2024/25				Total
	Male	Female	Other <sup>2</sup>	Not disclosed	
Number of employees (head count)	6,127	1,063	N/A	N/A	7,190
Number of permanent employees (head count)	5,600	955	N/A	N/A	6,555
Number of temporary employees (head count)	527	108	N/A	N/A	635

<sup>1</sup> Aurubis only hires employees with guaranteed working hours.

<sup>2</sup> We currently do not record a third gender in the Group globally. We will review the relevance of the category for future external reporting.

During the reporting period 682 of our employees left the undertaking (excluding apprentices). The fluctuation rate in the 2024/25 fiscal year was therefore 10 %.

### Methods and significant assumptions

The data is collected in a format standardized by Group HR, which provides it to the local HR departments on a monthly basis, and then consolidates the data. The numbers are reported by head count at the end of the reporting period. In the future, the data will be collected via an automated system, which we began implementing during the reporting year. There is no additional external validation of these metrics.

### S1-8 — Collective bargaining coverage and social dialogue

Coverage rate	Collective bargaining coverage		Social dialogue
	Employees — EEA	Employees — Non-EEA	Workplace representation (EEA only)
0–19 %	-	USA	-
20–39 %	-	-	-
40–59 %	-	-	Italy
60–79 %	-	-	Bulgaria
80–100 %	Germany, Bulgaria, Italy, Belgium, Spain, Finland	-	Belgium, Germany, Finland, Spain

### Methods and significant assumptions

Base salaries and fringe benefits are governed by collective agreements at our EEC sites. In the US these benefits are provided by the undertaking. Collective agreements provide a clear and uniform compensation framework and guarantee that national labor and industry standards are followed at the same time. Compensation is aligned with internal policies and external market comparisons for employees who are not under a collective agreement.

In the reporting year 86 % of employees were covered by a collective agreement. The percentage of employee representatives at country level for each EEC country is shown in the table above. The European Works Council represents Aurubis' European sites. There is no additional external validation of these metrics.

## S1-9 — Diversity metrics

### Gender distribution at top management level

Gender	Number of employees	Percentage of employees
Female	41	20
Male	161	80
Other <sup>1</sup>	N/A	N/A
Not reported	N/A	N/A
<b>Total</b>	<b>202</b>	<b>100</b>

<sup>1</sup> We currently do not record a third gender in the Group globally. We will review the relevance of the category for future external reporting.

### Employee age structure

Age	Number of employees
<30	1,371
30 to 50	3,815
>50	2,004
<b>Total</b>	<b>7,190</b>

### Methods and significant assumptions

Aurubis reports gender breakdown metrics at the highest management level across the Group. The highest management level is defined as the first and second level of the hierarchy below the Executive Board. Data for the diversity metrics shown in the tables is collected by the local HR departments via a standardized format and is then consolidated by Group HR. The metrics are not subject to additional external validation.

## S1-10 — Adequate wages

### Methods and significant assumptions

All our employees receive fair, adequate pay in accordance with the national minimum wages in the EEC countries where we operate. Furthermore, our employees in non-EEA countries receive fair and equal pay pursuant to the international benchmark for living wages from WageIndicator that exceeds the minimum wage established by the benchmark.

## S1-13 — Training and skills development metrics

For the S1-13 disclosures, we use the transition plan for this disclosure obligation for the first reporting year. We already report this metric because education and training for our employees is part of our 2030 sustainability targets.

### Training metrics

Gender	Average number of training hours per employee
Female	22.7
Male	22.8
Other <sup>1</sup>	N/A
<b>Total</b>	<b>22.8</b>

<sup>1</sup> We currently do not record a third gender in the Group globally. We will review the relevance of the matter for future external reporting.

### Methods and significant assumptions

The average number of training hours per employee and by gender is calculated by dividing the total number of completed training hours by the number of employees in each gender category pursuant to [S1-6](#). The training we provide helps employees maintain and/or improve their skills and knowledge. The metric reported includes both training on site and online. Data is collected monthly by the local HR departments at the sites in a standardized format and is consolidated by Group HR. There is no additional external validation of this metric.

## S1-14 — Health and safety metrics

### Health and safety metrics

FY 2024/25

<b>The number of fatalities as a result of work-related injuries and work-related ill health<sup>1</sup></b>	<b>1</b>
of which fatalities of own workforce	0
of which fatalities of temporary workers and employees of external companies	1
<b>Number of recordable work-related accidents<sup>2</sup></b>	<b>316</b>
of which recordable work-related accidents of own workforce	234
of which recordable work-related accidents of temporary workers and employees of external companies	82
<b>Rate of recordable work-related accidents<sup>3</sup></b>	<b>18.9</b>
Rate of recordable work-related accidents of own workforce	22.7
Rate of recordable work-related accidents of temporary workers and employees of external companies	12.8

<sup>1</sup> Includes all employees working at Aurubis sites. Temporary workers are employed by a temporary employment agency and not by Aurubis directly. Managerial authority is transferred to the hirer (Aurubis), who is responsible for health and safety. An employee of an external company, on the other hand, is a person who is directly employed by a legal entity and is contracted by Aurubis to perform work or deliver services.

<sup>2</sup> Recordable work-related accidents within the meaning of the ESRS include all work-related incidents that lead to injury or illness and require medical treatment beyond first aid and/or absence from work. The German definition of “recordable accidents/incidents” (accidents with personal injury and more than three lost work shifts) differs from the international definition of “recordable incidents/accidents” and as such cannot be directly compared.

<sup>3</sup> Recordable accidents per 1 million hours worked.

We have established a Health & Safety Management System in the entire undertaking that conforms to recognized international standards such as ISO 45001 and as such covers 100 % of the undertaking’s workforce.

Safety has the highest priority at Aurubis. Despite our extensive measures, there was a fatal accident involving one of our contractors at the Lünen site during the reporting year. We investigated the accident together with the authorities and communicated the results across sites. Preventative measures already installed at the sites were then scrutinized.

### Methods and significant assumptions

Group Health & Safety, which has a direct reporting line to the Executive Board, is responsible for consolidating data and preparing metrics. The sites collect the data and transmit it to Group Health & Safety. All production sites are certified in accordance with ISO 45001. The new Richmond site will be certified after production starts.

All incidents are reported to G-H&S, as well as directly to the COOs in the case of lost shifts, and then communicated to the entire Executive Board. Local teams investigate each case to identify technical, organizational or behavior-based causes. The insights gathered are shared throughout the Group.

The metrics are not subject to additional external validation.

## S1-17 — Incidents, complaints and severe human rights impacts

FY 2024/25

The total number of incidents of discrimination, including harassment	12
Number of complaints filed through channels for people in own workforce to raise concerns (excluding discrimination) <sup>1</sup>	5
The number of severe human rights incidents connected to the undertaking’s workforce, such as forced labor, human trafficking or child labor <sup>1</sup>	0

<sup>1</sup> We also consider complaints that have been submitted to the national points of contact for multinational OECD undertakings regarding defined topics, though cases that have already been reported are excluded. No complaints were submitted in fiscal year 2024/25.

The reported incidents of discrimination involved ethnic origin, gender and disabilities. Incidents of harassment and unfair treatment were also reported.

Incidents involving working and social conditions were reported as well. These were related to safety, payment practices, and vacation entitlements.

### Methods and significant assumptions

Aurubis has a whistleblowing system for anonymously reporting complaints and incidents. Furthermore, these reports can also be made via HR business partners, the local works council, or the local or global Discrimination Officer. The reports are passed on to the manager or the Compliance department accordingly. Fines, penalties and compensation for damages are documented in the Legal Affairs

department. The Human Rights Officer collects these cases from the departments mentioned at the end of the fiscal year. The metrics are not subject to additional external validation.

## S2 — Workers in the value chain

We are committed to fulfilling social and environmentally sustainable standards along our supply chain — especially when it comes to raw materials from regions of origin with potential risks. Our procurement practices align with internationally recognized guidelines. Because we are aware of the possible environmental and social impacts of raw material extraction, we integrate binding human rights and environmental protection clauses in our long-term supply contracts. As part of our Business Partner Screening (BPS), we systematically review our business partners' working conditions and strive to prevent or effectively mitigate potentially negative impacts.

### S2-SBM-3 — Material impacts, risks and opportunities and their interaction with strategy and business model

Our business has an influence on workers along our supply chain who work in mining, smelting, refining and recycling. These workers are exposed to specific health and safety hazards due to the heavy industrial nature of their work. Unsafe working conditions in the upstream value chain are often systemic and reflect a far-reaching problem in the industry.

Addressing the potential risks of child labor and forced labor is crucial in our processes. According to our abstract risk analysis, these risks are potentially present in countries like Egypt, the Philippines, the United Arab Emirates, and India. Though these problems are not widespread or systemic, their significance lies in the possible severity of their impacts. To counter both potential and actual negative impacts in the upstream value chain, we have implemented Business Partner Screening (BPS) [Q G1-2](#). We have introduced ESG contract clauses and are committed to promoting sustainable mining standards through initiatives such as the Copper Mark. These actions have positive effects on working conditions in our upstream value chain. Worker interests and rights are an integral part of risk assessments of our suppliers. If these assessments reveal potential or actual negative impacts, we take prevention and mitigation steps that take workers' rights, interests and perspectives into consideration. We account for the impacts on workers in our value chain when we adapt our processes and policies. So far we have not identified any material risks or opportunities stemming from impacts or dependence on workers in the value chain.

### IROs identified as material for topic S2 (Workers in the value chain)

Sub-topic	IRO type	Name	Location in the value chain	Time horizon
Working conditions	Impact (negative, actual)	Unsafe or unhealthy work environment in the upstream value chain		■ □ □
Working conditions	Impact (positive, actual)	Providing healthy and safe working conditions in the upstream value chain		■ □ □
Working conditions	Impact (negative, actual)	Generally more hazardous and higher-risk working conditions at production sites in the upstream value chain		■ □ □
Other labor rights	Impact (negative, potential)	Potential for forced labor in the upstream value chain		■ □ □
Other labor rights	Impact (negative, potential)	Potential for child labor in the upstream value chain		■ □ □

◀ Upstream value chain    ▲ Own operations    ▶ Downstream value chain  
 ■ □ □ Short term    □ ■ □ Medium term    □ □ ■ Long term

Please refer to [Q IRO-1](#) for details on the method for identifying and assessing material IROs.

### S2-1 — Policies related to value chain workers

Our Corporate Responsible Sourcing Policy takes a risk-based approach and defines the process for screening business partners pursuant to internationally recognized standards and the procedure for possible or actual violations of human rights or environmental human rights as described in [Q G1-2](#). It includes all employees of our suppliers. As a prerequisite for a business relationship, all direct suppliers have to either acknowledge our publicly available Business Partner Code of Conduct or, assuming comparable content, consent to the reciprocal acknowledgement of each other's codes of conduct. Topics such as human trafficking, forced labor, and child labor are mentioned explicitly. Furthermore, we have published a publicly accessible Policy Statement on Respecting Human Rights and Environmental Obligations to underscore our commitment to ethical business practices and sustainability.

**Policies related to the material IROs**

Impacts	Policies
Unsafe or unhealthy work environment in the upstream value chain	Business Partner Code of Conduct Corporate Responsible Sourcing Policy Aurubis AG Policy Statement on Respecting Human Rights and Environmental Obligations
Ensuring healthy and safe working conditions in the upstream value chain	Business Partner Code of Conduct Corporate Responsible Sourcing Policy Aurubis AG Policy Statement on Respecting Human Rights and Environmental Obligations
Generally more hazardous and higher-risk working conditions at production sites in the upstream value chain	Business Partner Code of Conduct Corporate Responsible Sourcing Policy Aurubis AG Policy Statement on Respecting Human Rights and Environmental Obligations
Potential for forced labor in the upstream value chain	Business Partner Code of Conduct Corporate Responsible Sourcing Policy Aurubis AG Policy Statement on Respecting Human Rights and Environmental Obligations
Potential for child labor in the upstream value chain	Business Partner Code of Conduct Corporate Responsible Sourcing Policy Aurubis AG Policy Statement on Respecting Human Rights and Environmental Obligations

Please refer to [9 IRO-2](#) for a list of all the applicable policies and commitments.

In fiscal year 2024/25, incidents of violations of the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises that concern value chain employees in our upstream value chain were reported. Specifically, these incidents involved a violation of the freedom of association, inadequate wages, unequal treatment, and insufficient safety. Aurubis takes steps to clarify the facts in order to increase the quality and completeness of information about the reported risks, mitigate specific risks, or prevent, end or reduce the scope of the violations. The process is outlined under [9 G1-2](#). In [9 S3-1](#) we also address incidents related to affected communities in our supply chain. These can potentially impact value chain workers as well.

**S2-2 — Processes for engaging with value chain workers about impacts**

The way potential or actual negative impacts are handled is influenced by the perspective of workers in the value chain. Our collaboration with suppliers for which concrete potential or actual negative impacts have been identified can take the form of an open dialogue and on-site assessments. We gain insights that influence our actions through direct exchange with supplier representatives and by observing working conditions on site. Cooperation with suppliers is adapted individually, based on the severity and likelihood of negative impacts that are determined. Pursuant to the “Stay and Improve” approach, we have defined targeted improvement plans based on negative impacts identified and work together with suppliers to implement them. The options available to influence suppliers can determine whether we can effectively take relevant measures.

The central purchasing functions, Commercial and Procurement, are operationally responsible for cooperation in the value chain. Procurement reports to the CFO, while Commercial is organized by topic and reports to one of the two COOs based on area of responsibility.

**S2-3 — Processes to remediate negative impacts and channels for value chain workers to raise concerns**

Aurubis has set up channels value chain workers can use to confidentially and safely express concerns. We inform our suppliers about these grievance mechanisms within the context of the Business Partner Code of Conduct. We expect our business partners to report substantiated suspicions of human rights violations. Sites that participate in the Copper Mark process can submit concerns through the Copper Mark Grievance Mechanism as well. By accepting the Business Partner Code of Conduct, suppliers also confirm their awareness of the reporting mechanism described there.

The existing rules of procedure were extensively revised when the new whistleblowing system was introduced. The updated rules of procedure are publicly available on our homepage and state that whistleblowers face no repercussions for submitting tips and are effectively protected from punishment. Additional information about the whistleblowing system is available under [9 G1-3](#).

As we are subject to the German Supply Chain Due Diligence Act (LkSG), the Federal Office for Economic Affairs and Export Control (BAFA) serves as an additional channel through which complaints and notifications can be submitted to us and which we process accordingly.

If possible or actual violations of human rights or environmental human rights are identified at our suppliers, actions are developed that aim to reduce these risks — as described in [9 G1-2](#).

## S2-4 — Taking action on material impacts on value chain workers, and approaches to mitigating material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions

One of the most important actions Aurubis has taken to address potential and actual negative impacts in the supply chain is Business Partner Screening (BPS), which we explain in [9 G1-2](#). If concerns arise, we initiate contact with the supplier to obtain additional information and possibly take further due diligence measures. Evaluating working conditions and investigating possible child labor and forced labor are integral parts of our Business Partner Screening. Our policy explicitly states that we withdraw from business relationships in confirmed cases of child labor, in accordance with our zero-tolerance approach and pursuant to international guidelines. In cases of forced labor, we assess the severity and type of risk and can take corrective action or end the business relationship if remedial action is not possible or the supplier does not cooperate.

In the 2024/25 fiscal year, we were informed about suspected severe human rights incidents in our supply chain.<sup>1</sup> These involved fatalities due to mining accidents at suppliers. We investigate all suspicions of human rights violations in the supply chain in the scope of our Business Partner Screening. The process is outlined under [9 G1-3](#). In [9 S3-4](#) we also address possible additional severe human rights incidents related to affected communities in our supply chain. These can potentially impact value chain workers as well.

### External audits

Since 2013, Aurubis' gold production has been annually certified as conflict-free in accordance with the standards of the London Bullion Market Association (LBMA). This certificate verifies that we carry out our due diligence processes in accordance with the OECD standards. This certification option has been available for silver since 2019, and Aurubis' silver production has been certified as conflict-free since then as well. Tin production at our Beerse and Berango sites has been consistently certified as conflict-free in accordance with the Responsible Minerals Assurance Process Standard (RMAP) from the Responsible Minerals Initiative (RMI) since 2015. This standard is also based on the OECD standard for conflict minerals.

<sup>1</sup> These incidents will be classified as "suspected incidents" until the question of fault has been clarified.

<sup>2</sup> FY 2024/25 reference value: 25 % of copper concentrate sources have been certified or audited.

The external audit for compliance with the due diligence requirements in accordance with the EU Conflict Minerals Regulation was concluded successfully for the Hamburg site. This legislation makes due diligence and auditing obligations along the supply chain binding for EU importers of tin, tantalum, tungsten and their ores, as well as gold. The screening process is part of this external audit. We are part of the Copper Mark sector solution, an independent body that externally certifies our sustainability performance. The Copper Mark initiative reviews the sustainability standards at copper production sites, including mines, smelters and refineries, among other things. This allows us to document our performance and receive suggestions for continuous improvements as needed, which we follow up with concrete action plans. The Copper Mark covers the 32 sustainability criteria (33 since 2025) set out in the Responsible Minerals Initiative's (RMI) Risk Readiness Assessment and incorporates topics such as compliance, environmental protection, and occupational safety. It is also aligned with the United Nations Sustainable Development Goals (SDGs).

Just under 40 % of the copper produced worldwide comes from sites that have been awarded the Copper Mark (as of September 2025). The Copper Mark successfully audited the Aurubis plants in Hamburg, Lünen and Stolberg (all in Germany), Beerse and Olen (Belgium), and Pirdop (Bulgaria) in line with its due diligence standard for the responsible procurement of copper, lead, nickel and zinc.

## S2-5 — Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Our ambition is to minimize negative impacts on people and the environment in our supply chains. We have set the following target as part of our company strategy:

### 2030 target

Doubling the number<sup>2</sup> of certified or audited sources for copper-containing concentrates.

### Targets — methodology and monitoring

Our targets were adapted accordingly for fiscal year 2024/25. Although the degree of target achievement cannot be directly compared with the previous values due to the changes to the metrics, the new targets enable improved transparency and a clearer and more objective review of future progress.

Aurubis has set the target of doubling the number of sources of copper-containing concentrates that either have a current, independent certification by third parties in accordance with an internationally recognized responsible mining standard — such as the Copper Mark, IRMA or comparable certifications — or have undergone an on-site assessment by Aurubis or commissioned third parties by 2030. These assessments follow a defined process and are valid for three years. This includes concentrates sourced both directly from mines and indirectly via traders.

The scope of this obligation includes all purchasing activities for copper-containing concentrates at all Aurubis sites. Certifications and audits have to cover at least the following topics: health and safety, worker rights, affected communities, environmental pollution, water consumption and discharge, decarbonization, biodiversity, residue management, security and human rights.

While external stakeholders were not directly involved in setting the targets, external experts play a key role both in defining the internationally recognized standards and monitoring adherence to them.

Furthermore, perspectives from the respective production site’s stakeholders are included in independent audits. In some on-site assessments, we cannot systematically guarantee that stakeholder perspectives are included. By prioritizing independent audits within the scope of the standards mentioned above, perspectives of value chain workers are nevertheless considered and reinforced indirectly.

### S3 — Affected communities

We bear responsibility towards the communities affected by our business activities, particularly in the areas surrounding our production sites. We promote sustainable development and social prosperity on site through continuous dialogue and targeted initiatives. This applies in a similar way to the communities affected by raw material extraction in our supply chain. We expect our suppliers to advocate for respecting human rights and promoting social and environmental standards in mining regions.

#### S3-SBM-3 — Material impacts, risks and opportunities and their interaction with strategy and business model

We are aware of our responsibility as an undertaking and actively help improve the lives of people in the communities near our plants through our involvement with socially disadvantaged groups as well as cultural, sports, educational and environmental organizations. Our focus is on initiatives in the areas of knowledge, environmental protection, and civic participation that align with our core business. In doing so, transparency and ethical standards are very important to us.

In our supply chain there are negative impacts on communities, especially near mining operations, due to the nature of the industry. The main problems are competition for water in mining and insufficient disposal of waste from production facilities. These problems are not systemically widespread but involve individual incidents in the value chain.

In its own business area, Aurubis has no sites in regions with indigenous peoples.

#### IROs identified as material for topic S3 (Affected communities)

Sub-topic	IRO type	Name	Location in the value chain	Time horizon
Economic, social and cultural rights of communities	Impact (positive, actual)	Commitment to solving social problems in the regions where we ourselves are active	◀ ▲ ▶	□ □ ■
Economic, social and cultural rights of communities	Impact (negative, actual)	Inadequate water management in mining and its impacts on communities	◀ ▲ ▶	■ □ □

Sub-topic	IRO type	Name	Location in the value chain	Time horizon
Economic, social and cultural rights of communities	Impact (negative, actual)	Negative/adverse impact from production facilities (waste) on neighboring communities	◀ ▲ ▶	■ □ □

◀ Upstream value chain   ▲ Own operations   ▶ Downstream value chain  
 ■ □ □ Short term   □ ■ □ Medium term   □ □ ■ Long term

Please refer to [9 IRO-1](#) for details on the method for identifying and assessing material IROs.

### S3-1 — Policies related to affected communities

We bundle our social engagement in the areas of education, environmental protection, and civic participation with our “together we care” strategy. This includes our own sites as well as the countries where we source our raw materials. We choose the projects and partners we support in accordance with clearly defined criteria established in our Social Engagement Policy. The policy applies to all affected communities — both in our own operations and along our supply chain. Our sites have the opportunity to decide for themselves what projects they would like to support within this framework. The Social Engagement corporate function coordinates international initiatives and site-specific projects in Hamburg.

Our principles for responsible raw material purchasing are laid out in our Corporate Responsible Sourcing Policy and are supplemented by our Aurubis AG Policy Statement on Respecting Human Rights and Environmental Obligations. We communicate our requirements for suppliers through our Business Partner Code of Conduct, which direct suppliers have to agree to before a business relationship is initiated. One central aspect of the Code of Conduct is respectful treatment of local communities, including indigenous peoples and land owners. Business partners must respect the rights, livelihoods, resources and cultural heritage of these communities and treat them fairly. This includes the right to free, prior and informed consent (FPIC). Moreover, the illegal appropriation of land, forests and bodies of water crucial to people’s subsistence is prohibited.

If potential or actual violations of human rights or environmental human rights are identified in affected communities near our suppliers, actions are developed that aim to reduce these risks, as described in [9 G1-2](#).

In the reporting period, incidents of violations of the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises that concern affected communities in the supply chain were reported via the channels listed in [9 S3-3](#). These incidents involved forced evictions, soil, water and air pollution, and land rights. Aurubis takes steps to clarify the facts in order to increase the quality and completeness of information about the reported risks, mitigate specific risks, or prevent, end or reduce the scope of the violations. The process is outlined under [9 G1-2](#).

### Policies related to IROs identified as material

Impacts	Policies
Commitment to solving social problems in the regions where we operate	Social Engagement Policy
Inadequate water management in mining and its impacts on communities	Business Partner Code of Conduct Aurubis AG Policy Statement on Respecting Human Rights and Environmental Obligations
Negative/adverse impact from production facilities (waste) on neighboring communities	Business Partner Code of Conduct Aurubis AG Policy Statement on Respecting Human Rights and Environmental Obligations

Please refer to [9 IRO-2](#) for a list of all the applicable policies and commitments.

### S3-2 — Processes for engaging with affected communities about impacts

Aurubis advocates for direct dialogue with affected communities or their representatives. We would like to be a good neighbor and believe that it is important that people in our area are informed about the activities on our plant premises. Our plant and site managers maintain open and routine dialogue with the neighborhood. This dialogue enables us to keep our neighbors up to date, but also to better understand their needs and expectations so we can specifically align our engagement with the community’s demands.

To evaluate the effectiveness of our long-term projects, we have developed our own questionnaire that we send to selected project partners. We receive annual reports from some partners as well. This feedback

enables us to record the concrete results and sustainable benefits of our engagement and continuously improve it [Q S3-4](#).

To better understand the viewpoints of communities affected by material impacts along the supply chain, Aurubis actively takes part in multi-stakeholder dialogues such as the Automotive Industry Dialogue and the Copper Mark Advisory Council. Media reports are also taken into consideration as part of the screening process to stay informed about incidents along our supply chain [Q G1-2](#).

### S3-3 — Processes to remediate negative impacts and channels for affected communities to raise concerns

We conduct risk assessments and continuous monitoring via our Business Partner Screening to identify potential negative impacts along our supply chain [Q G1-2](#). If possible or actual violations of human rights or environmental human rights are identified in affected communities near our suppliers, actions can be developed that aim to reduce these risks — as described in [Q G1-2](#).

Affected communities that are located near our plants or live along our supply chain can communicate their concerns and issues to us directly via our whistleblowing system. More information about the whistleblowing system is available in [Q G1-3](#).

As we are subject to the German Supply Chain Due Diligence Act (LkSG), the Federal Office for Economic Affairs and Export Control (BAFA) serves as an additional channel through which complaints and notifications can be submitted to us and which we process accordingly.

### S3-4 — Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions and approaches

Aurubis takes part in a variety of social and environmental projects on site to strengthen local communities. All sites have identified projects that they support in their vicinity pursuant to the requirements set out in our Group-wide policy.

For instance, the Olen site works with the Belgian organization *Welzijnsschakels*, which works to fight poverty, exclusion and discrimination. Local educational initiatives are supported, learning materials are

provided, extracurricular activities are sponsored, and environmental education days for children and youth are organized together with schools. In environmental protection, we work together with employees and volunteers from *Natuurpunt* in planting campaigns to expand the Van de Velderreservat/Turnhout nature conservation area.

In Hamburg we support local educational initiatives such as *Neugier ahoi!* and the *Kinder forschen* foundation, which advocates for STEM education for young children. Together with the *Schule auf der Veddel*, we support equal opportunity and promote skills in reading, in environmental and cultural topics, and positive experiences building self-confidence. With the 10+ vocational project, we prepare students for apprenticeships with practical learning days in our production operations.

At the Bulgarian site in Pirdop, partnership programs continued with the Pirdop, Zlatitsa and Anton communities during the reporting period. The cooperation is based on framework agreements with the respective towns. The programs concentrate on promoting education, healthcare and a healthy lifestyle, as well as strengthening the region. There is also an annual agreement between the shareholders of the Pirdop hospital and three companies, including Aurubis Bulgaria, to cover the hospital's operational deficit.

We are involved in local communities in supplier countries too, for example with a water and biodiversity project in Peru as well as a *Fundación Niños del Arco Iris* education program. In O'Higgins, Chile, we promote dual vocational education following the German model and support elementary schools with digitalization programs.

We monitor our projects, for example tracking how our funds are used, to evaluate the impact of our social engagement. In addition, our project partners regularly inform us about their current measures and plans. We set the annual budget for social engagement in our target [Q S3-5](#).

Our Business Partner Screening is our central measure for countering negative impacts that have been identified in our supply chain. It aids in identifying, assessing and controlling risks within the scope of the Aurubis risk management system for human rights in the supply chain. We describe additional details in [Q G1-2](#). Based on the findings from [Q S3-2](#), we also started realigning engagement along the supply chain during fiscal year 2024/25 to more specifically address the impacts of business activities in production countries — especially in mining. For instance, existing social engagement initiatives will be adapted to

focus more on the effects of mining in Peru going forward. One specific project will concentrate on sustainable water use and maintaining biodiversity.

In the 2024/25 fiscal year, we were informed about confirmed and suspected severe human rights incidents in connection with affected communities in our supply chain.<sup>1</sup> These included reports of competition for water that allegedly made affected communities' access to clean water more difficult, as well as air, soil and water pollution. We investigate all suspicions of human rights violations in the supply chain in the scope of our Business Partner Screening. The process is outlined under [Q G1-2](#).

### S3-5 — Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Locally and internationally, we have the ambition of being a reliable partner that is making a lasting contribution to a livable environment. We have set the following target for our operations and the supply chain as part of our company strategy:

#### 2030 target

80 % long-term partners (percentage of total budget); €2 million annual budget for social engagement.

Many of our sustainability targets aim to contribute to the well-being of communities in which we are active. These targets comprise environmental and social dimensions and cover both our own activities and our entire supply chain. Beyond this, Aurubis has set a clear, absolute target specifically focused on social engagement in affected communities.

#### Targets — methodology and monitoring

The targets were formulated as part of the 2030 sustainability targets [Q SBM-3](#). Our target aligns with the Social Engagement Policy and the degree of target achievement is calculated at least once a year. In fiscal year 2024/25, the total budget was €2.1 million, with long-term partners accounting for 90 % of this amount. The Executive Board adjusted the target in fiscal year 2024/25. The budget was set at the previous minimum as a direct reaction to current economic uncertainties and changes in market conditions.

<sup>1</sup> These incidents will be classified as "suspected incidents" until the question of fault has been clarified.

External stakeholders were not involved in setting the targets. However, they play a central role in implementation since they realize selected projects on site and as such make a significant contribution to achieving the intended impacts and objectives.

## G1 — Business conduct

At Aurubis, responsible corporate governance is fundamental to the sustainable development of our business activities. We view business conduct from multiple perspectives and focus on creating positive impacts both inside the company and in the broader community.

Aurubis is firmly committed to ensuring legal compliance and fostering transparency as a matter of course. We provide access to reporting mechanisms, like our whistleblowing system, to everyone and prioritize regular training and awareness raising for employees on anti-corruption and anti-bribery efforts. We shape and strengthen our company culture by fostering a shared sense of purpose among Aurubis employees and supporting long-term engagement.

Responsible corporate governance also includes a strong focus on our relationships with suppliers. We promote responsible business practices and implement due diligence processes to increase transparency along our supply chain. In addition, we ensure that our direct suppliers acknowledge and follow the Aurubis Business Partner Code of Conduct.

### IROs identified as material for topic G1 (Business conduct)

Sub-topic	IRO type	Name	Location in the value chain	Time horizon
Corporate culture	Impact (positive, actual)	Established positive culture, both formal and informal	◀ ▲ ▶	■ □ □
Protection of whistleblowers	Impact (positive, actual)	Protection of whistleblowers	◀ ▲ ▶	■ □ □
Corruption and bribery	Impact (positive, actual)	Promotion of anti-corruption and anti-bribery actions	◀ ▲ ▶	■ □ □

Sub-topic	IRO type	Name	Location in the value chain	Time horizon
Management of relationships with suppliers, including payment practices	Impact (positive, actual)	Taking account of environmental and social criteria in Business Partner Screening	◀ ▲ ▶	■ □ □
Management of relationships with suppliers, including payment practices	Impact (positive, actual)	Mandatory compliance with Aurubis Business Partner Code of Conduct	◀ ▲ ▶	■ □ □

◀ Upstream value chain   ▲ Own operations   ▶ Downstream value chain  
 ■ □ □ Short term   □ ■ □ Medium term   □ □ ■ Long term

Please refer to [9 IRO-1](#) for details on the method for identifying and assessing material IROs.

### G1-1 – Corporate culture and business conduct policies

The procedure for protecting whistleblowers is outlined in our Rules of Procedure for the Whistleblowing System. These rules align with the German Supply Chain Due Diligence Act (LkSG), the General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG) to ensure the lawful and secure processing of personal data. It is accessible to all stakeholders. Furthermore, the Aurubis Compliance Management System (CMS) is based on the COSO framework, a comprehensive model for internal control and risk management. The directive is also based on IDW PS 980 n.F., which outlines the principles for a proper compliance management system. Our compliance policy also includes provisions for investigating incidents related to corporate governance — including those involving corruption and bribery — promptly, independently and objectively. We outline the procedures and training for preventing and uncovering corruption and bribery in [9 G1-3](#).

Aurubis fosters a positive company culture by actively communicating its guiding principles through the Code of Conduct and the Diversity Commitment. With our company-wide Power for Performance culture target picture, we promote a culture of personal responsibility and continuous improvement. This cultural target vision encompasses seven action fields: People Focus, Risk Awareness, Collaboration, Leadership,

Innovation, Changeability and Communication. They are fully integrated into our performance management processes and leadership development concepts. In the past fiscal year, over 800 employees participated in this development in pulse checks and workshops.

### Policies related to the material IROs

Impacts	Policies
Established positive culture, both formal and informal	Code of Conduct Diversity Commitment
Protection of whistleblowers	Code of Conduct Rules of Procedure for the Whistleblowing System Compliance Policy
Promotion of anti-corruption and anti-bribery actions	Code of Conduct Corporate Anti-Corruption Compliance Policy
Taking account of ecological and social criteria in Business Partner Screening	Corporate Responsible Sourcing Policy
Mandatory compliance with Aurubis Business Partner Code of Conduct	Business Partner Code of Conduct

Please refer to [9 IRO-2](#) for a list of all the applicable policies and commitments.

### G1-2 – Management of relationships with suppliers

Aurubis is committed to fair payment practices, including the prevention of late payments. Our procurement processes are designed to honor the specific payment terms agreed with each supplier, regardless of their size or location. We fulfill our contractual obligations and monitor our compliance to maintain trusting, reliable customer relationships.

As a prerequisite for a business relationship, all direct suppliers have to either acknowledge our Business Partner Code of Conduct or, assuming comparable content, consent to the reciprocal acknowledgement of each other's codes of conduct. This is how we transparently document the formal acknowledgement of our requirements regarding environmental protection, human rights, working conditions and anti-corruption. By holding our direct suppliers to these standards, we promote responsible practices and a culture of integrity and sustainability across our global supplier network.

We also foster responsible corporate governance through a risk-based due diligence process. This helps us identify, assess and manage potential risks related to human rights, the environment and governance.

### Business Partner Screening (BPS)

Business Partner Screening is one of the most important actions Aurubis has taken to address potential and actual negative impacts in the supply chain. This screening is a structured, risk-based process for assessing responsible practices in the supply chain by verifying the identity and integrity of business partners and supply chains. The Commercial, Corporate Procurement and Corporate Energy & Climate Affairs divisions manage this process, which is aligned with international standards.<sup>1</sup> It is updated regularly to adequately reflect changing regulations, especially 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).

In the 2024/25 fiscal year, Aurubis transferred the role of Human Rights Officer from a committee-based solution to an individual appointment. The role of Head of Corporate Sustainability now also includes the responsibilities of the Human Rights Officer in the Group. These include the internal monitoring and evaluation of processes related to human rights due diligence.

Business Partner Screening (BPS) is mandatory for all new suppliers and must be completed before a contract can be concluded. Metals suppliers in both the primary and secondary sectors, sources of metallic raw materials in the primary sector and suppliers of other goods and services with an annual business volume or project-related revenue exceeding €10,000 are screened with regard to their human rights due diligence and potential compliance risks.

The IT-supported screening process comprises a series of steps. For human rights risks and environmental human rights risks the screening process is broken down into an abstract and a concrete risk assessment. First, an assessment of potential human rights risks is conducted based on business partner type, the purchasing area, and country- and sector-specific factors. This abstract risk assessment complies with the requirements of the German Supply Chain Due Diligence Act (LkSG) and determines to what extent a more detailed, concrete risk assessment is needed. The BPS process stipulates that business partners classified as

medium or high risk in the abstract risk analysis are subject to a more detailed concrete risks analysis. This consists of a questionnaire on sustainability criteria and a request for a screening report from an external service provider that covers compliance and finance aspects.

The Corporate Compliance and Corporate Sustainability departments are involved in the concrete risk assessment of business partners with a medium or high risk indication. It focuses on respect for human rights, anti-corruption, working conditions, occupational safety, environmental protection and the OECD Due Diligence Guidance for Responsible Supply Chains and Certification by Third Parties. The processes and management systems the supplier uses to reduce the relevant risks are evaluated. The results from external data sources are also assessed to identify potential risks (e.g., sanctions, human rights or governance-related incidents, compliance, financial stability) related to the respective suppliers.

If the concrete risk assessment identifies potential risks or concrete violations of human rights or environmental regulations, then measures are drafted to improve the quality and completeness of information on these cases, improve the supplier's sustainability performance, or reduce the concrete risks. This includes not only the supplier's employees, but also the communities affected by its business activities. The Corporate Sustainability and Corporate Compliance departments devise the measures and the purchasing departments present them to the suppliers. These measures are designed to focus on the prevention and redress of identified risks or violations. This process is incorporated into our communication with screened suppliers. If the department conducting the review deems it necessary, then additional information on the facts of the case is exchanged. This information exchange can take the form of a statement from the supplier about the situation on site, an agreement on an improvement plan, an ESG dialogue, an on-site inspection carried out by Aurubis employees, or an independent assessment. In the next step of the BPS process, the results of the review are submitted for approval and the respective supplier is either approved or rejected as a business partner.

As outlined in [9 S2-5](#), we have defined a clear ambition and a target with a set timeframe to guide our efforts.

<sup>1</sup> The five-stage OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk-Areas, the Copper Mark's Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc, EU Regulation 2017/821 on Conflict Minerals, the LBMA Responsible Gold and Silver Guidance, the Responsible Minerals Assurance Process (RMAP) for tin and tantalum, and the German Supply Chain Due Diligence Act.

## G1-3 — Prevention and detection of corruption and bribery

Preventing corruption and anti-competitive behavior in the course of our business activities is a key aspect of our corporate responsibility and one of the central topics of our compliance activities.

### Compliance Management System

As part of our commitment to ethical business practices, we have established comprehensive anti-corruption measures in our Compliance Management System. For Aurubis, compliance is about more than just meeting the legal requirements — it involves aligning all our actions with ethical principles, company values and internal policies. Our goal is full compliance with all applicable laws and company policies. We are aware that violations can have serious consequences, and not just for individual employees but also for the entire Aurubis Group and our business partners. We do not tolerate corruption, bribery or the payment of kickbacks under any circumstances.

Corporate Compliance is the central contact for all compliance-related issues in the company. The local compliance officers are the first point of contact for employees at the Group's sites. Together with the Executive Board, Corporate Compliance and the local compliance officers actively work to further strengthen legal and regulatory compliance. Corporate Compliance regularly reports on compliance-related topics to the local compliance officers.

The Chief Compliance Officer reports quarterly, and as circumstances may require, to the entire Executive Board and Audit Committee of the Supervisory Board with regard to the advancement of the Compliance Management System, compliance violations, and any actions taken in response. Corporate Compliance works closely with Risk Management and Internal Audit to strengthen the internal control system.

As part of the Compliance Management System, we establish the compliance-relevant principles, advance the corresponding compliance organization, and identify, analyze and communicate significant Aurubis policies and commitments. Our compliance program introduces principles and actions for limiting risks and preventing violations. The compliance measures include prevention, monitoring and sanctions. Our preventative measures include a comprehensive risk assessment, internal policies, guidance and especially training for our employees on anti-corruption topics. Our policies and training documents are updated, and new findings are incorporated at least every three years.

All compliance-related policies and the Code of Conduct for employees are available on our intranet and thus accessible to all employees. The department heads regularly submit written confirmation of compliance with these policies, including the Anti-Corruption Policy, to the Chief Compliance Officer once a year. Our Corporate Anti-Corruption Compliance Policy and our Code of Conduct for employees are at the core of our anti-corruption efforts. Compliance risks, especially for corruption and bribery, are comprehensively identified for our smelter sites as part of the previously mentioned compliance risk assessments.

### Anti-corruption training program

Anti-corruption training is conducted for identified at-risk functions, which are selected based on specific criteria to ensure that the relevant business and risk areas at Aurubis are covered. These at-risk functions also include the Executive Board members. The anti-corruption training program is delivered as an e-learning course and repeated every three years as a rule. To track the effectiveness of our training program, participants are required to complete a test once they have completed the e-learning course. Participation is documented. New employees in identified at-risk functions generally complete their training within six months of joining the company. The training program covers 100 % of at-risk functions, which represent roughly 20 % of our workforce.

For any violations, the independent interdisciplinary committee — consisting of the Chief Compliance Officer, the Head of Legal Affairs, the Head of Group Security, and the Head of Internal Audit — is responsible for coordinating the review process and defining investigative responsibilities.

### Aurubis introduces enhanced whistleblowing system for greater transparency

Aurubis contributes to positive material impacts in the areas of anti-corruption and whistleblower protection by fostering a powerful culture of integrity and transparency across all plants and throughout its own operations and across the entire value chain. Providing a secure, digital whistleblowing system is a key element of this approach.

In April 2025, Aurubis introduced a new whistleblowing system to replace the previous whistleblower hotline. The new system is based on the EQS Integrity Line and is accessible around the clock for employees and external stakeholders in all company languages as well as Turkish and Polish. Whistleblowers can submit reports and further communicate directly with Aurubis fully anonymously via a secure mailbox,

ensuring them the legal protection they are entitled to. Whistleblowers do not suffer any negative repercussions. Internal case processing follows defined steps while maintaining confidentiality (as described in the rules of procedure). Incidents are processed and documented centrally in the system and additional caseworkers are involved where needed. Access rights safeguard confidentiality, and automatic reminders support timely responses in accordance with legal requirements.

The fully digital whistleblowing system is part of our continued commitment to protecting whistleblowers and contributes to strengthening risk awareness and a speak-up culture, which are core values of Aurubis' corporate culture. The new system provides a secure, anonymous and user-friendly platform for reporting potential violations or concerns. The introduction of the new whistleblowing system was supported by broad internal communication, such as intranet announcements. The new whistleblowing system reduces the threshold for whistleblowers to speak out and at the same time provides a safe and user-friendly option for anonymously submitting tips. We will monitor the effectiveness of the new whistleblowing system, and how well known it is, in the 2025/26 fiscal year.

Group Security conducted a new Group-wide e-learning program to raise employee awareness of risks from malicious insiders. This training course is mandatory for all employees in the Group and is designed to sharpen awareness of internal threats.

## IT & cybersecurity

Aurubis considers cybersecurity to be a significant risk and has therefore instigated actions to protect its IT systems. These include centralized security management based on international standards, regular audits, employee training, and technical safeguards.

### IROs identified as material for entity-specific topic IT & cybersecurity

Sub-topic	IRO type	Name	Location in the value chain	Time horizon
Entity-specific	Risk	Business interruption in the event of a cyberattack on Aurubis	◀  ▶	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>

 Upstream value chain 
  Own operations 
  Downstream value chain  
   Short term 
    Medium term 
    Long term

Please refer to [9 IRO-1](#) for details on the method for identifying and assessing material IROs.

### IT & cybersecurity policies

Cybersecurity has been identified as a financially material risk for Aurubis. Centrally managed IT systems used across multiple sites are potentially vulnerable to external cyberattacks. Such attacks have the potential to disrupt operations, damage the trust of business partners, and cause significant financial harm. Aurubis implemented the Corporate Policy on Information Security and the Corporate Policy on OT Security to counter these risks.

**Policies related to the material IROs**

Risk	Positive/negative	Policies
Business interruption in the event of a cyberattack on Aurubis	Risk	Corporate Policy on Information Security, Corporate Policy on OT Security

**Description of the policies and their connection to material risk**

The Corporate Policy on Information Security defines the scope, objectives, measures, responsibilities, obligations and processes related to information security for Aurubis AG and its subsidiaries. Its purpose is to ensure appropriate information security for IT systems and data within Aurubis' scope of responsibility. The policy is based on mandatory certification standards such as ISO/IEC 27001 and ISAE 3402, as well as on voluntary recommendations like the BSI Standards 200-x.

Please refer to [9 IRO-2](#) for a list of all the applicable policies.

**IT & cybersecurity actions**

Aurubis has invested in comprehensive IT security measures to counter the growing global threat of cyberattacks. The IT networks of production facilities (OT) are managed by the individual plants, with support from the central IT function and in consultation with the IT Security Officer. Subsidiaries independently maintain their own IT systems. The OT Security units regularly exchange ideas and information on current topics and threats at both the global and the local level.

The risk mitigation actions for each risk are reviewed and updated as needed as part of the quarterly risk assessments conducted with Corporate Risk Management. A phishing test is also conducted once a year, and the results are analyzed and incorporated into IT security training sessions. E-learning sessions are delivered to employees via the in-house Learning Management System (LMS) and jointly evaluated with HR. Additional training materials are currently in development. Customized training sessions are provided as needed, particularly for areas that are highly sensitive or critical, including those where significant incidents have occurred in the past.

Regular technical security tests (penetration tests or pentests) are performed on particularly critical systems, such as those with external access to Aurubis data. Testing is conducted both in-house and by third parties. These tests identify vulnerabilities and attack vectors but also misconfigurations, enabling targeted remediation and enhancing the company's overall information security.

Aurubis operates an Information Security Management System (ISMS) aligned with the international ISO/IEC 27001 standard. TÜV carries out annual audits to detect deviations from the standard at an early stage. The last audit was conducted in October 2025. Focal areas include technical security measures such as firewalls and network security, the planning and execution of third-party security assessments, and support for upcoming improvement initiatives. Organizational provisions such as processes, workflows and work instructions are also essential components of the ISMS. The IT Security Officer can contact the Aurubis Executive Board at any time to raise concerns.

Dedicated reporting channels have been established in the company to improve the detection and management of information security incidents. Any employee can contact the Aurubis IT Security Officer at any time by phone, chat or email. These reporting channels are also outlined during training sessions. An IT security due diligence program is also in place: Third parties, such as new Software-as-a-Service providers and IT service providers, are screened using a standardized checklist, and all approvals are documented.

The roll-out of the prioritized measures identified in the IT/OT security checks at the sites started in fiscal year 2023/24 and has continued. Follow-up site visits are scheduled to verify and document the implementation of each completed measure.

**IT & cybersecurity targets**

Our 2030 sustainability targets do not include a specific target for IT and cybersecurity. Nevertheless, we monitor the effectiveness of the above-mentioned policies and actions as part of our ISO/IEC 27001 certification, which is reviewed annually by both external and internal bodies.

## Appendix 1. List of data points in general and topical standards derived from other EU legislation

The following table shows data points derived from various EU legislative frameworks, as listed in ESRS 2 Appendix B. It shows whether these data points were classified as material or whether they fall under the phase-in provisions, and thus are not included in this report.

Disclosure requirement	Data point	Name	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference
ESRS 2 GOV-1	21d	Board's gender diversity	x		x	
ESRS 2 GOV-1	21e	Percentage of board members who are independent			x	
ESRS 2 GOV-4	30	Statement on due diligence	x			
ESRS 2 SBM-1	40d (i)	Involvement in activities related to fossil fuel activities	x	x	x	Not material
ESRS 2 SBM-1	40d (ii)	Involvement in activities related to chemical production	x		x	
ESRS 2 SBM-1	40d (iii)	Involvement in activities related to controversial weapons	x		x	Not material
ESRS 2 SBM-1	40d (iv)	Involvement in activities related to the cultivation and production of tobacco			x	Not material
ESRS E1-1	14	Transition plan to reach climate neutrality by 2050			x	
ESRS E1-1	16g	Undertakings excluded from Paris-aligned Benchmarks		x	x	
ESRS E1-4	34	GHG emission reduction targets	x	x	x	
ESRS E1-5	38	Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors)	x			
ESRS E1-5	37	Energy consumption and mix	x			
ESRS E1-5	40 to 43	Energy intensity associated with activities in high climate impact sectors	x			
ESRS E1-6	44	Gross Scopes 1, 2, 3 and Total GHG emissions	x	x	x	
ESRS E1-6	53 to 55	Gross GHG emissions intensity	x	x	x	
ESRS E1-7	56	GHG removals and carbon credits				x
ESRS E1-9	66	Exposure of the benchmark portfolio to climate-related physical risks			x	Phase-in option utilized
ESRS E1-9	66a	Disaggregation of monetary amounts by acute and chronic physical risk		x		Phase-in option utilized
ESRS E1-9	66c	Location of significant assets at material physical risk		x		Phase-in option utilized
ESRS E1-9	67c	Breakdown of the carrying value of its real estate assets by energy-efficiency classes		x		Phase-in option utilized
ESRS E1-9	69	Degree of exposure of the portfolio to climate-related opportunities			x	Phase-in option utilized
ESRS E2-4	28	Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil	x			
ESRS E3-1	9	Water and marine resources	x			
ESRS E3-1	13	Dedicated policy	x			Not material
ESRS E3-1	14	Sustainable oceans and seas	x			Not material

Disclosure requirement	Data point	Name	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference
ESRS E3-4	28c	Total water recycled and reused	x			Not material
ESRS E3-4	29	Total water consumption in m <sup>3</sup> per net revenue in own operations	x			Not material
ESRS 2 — SBM-3 — E4	16a (i)		x			Not material
ESRS 2 — SBM-3 — E4	16b		x			Not material
ESRS 2 — SBM-3 — E4	16c		x			Not material
ESRS E4-2	24b	Sustainable land/agriculture practices or policies	x			Not material
ESRS E4-2	24c	Sustainable oceans/seas practices or policies	x			Not material
ESRS E4-2	24d	Policies to address deforestation	x			Not material
ESRS E5-5	37d	Non-recycled waste	x			Not material
ESRS E5-5	39	Hazardous waste and radioactive waste	x			Not material
ESRS 2 SBM-3 — S1	14f	Risk of incidents of forced labour	x			
ESRS 2 SBM-3 — S1	14g	Risk of incidents of child labour	x			
ESRS S1-1	20	Human rights policy commitments	x			
ESRS S1-1	21	Due diligence policies on issues addressed by the fundamental International Labour Organization Conventions 1 to 8			x	
ESRS S1-1	22	Processes and measures for preventing trafficking in human beings	x			
ESRS S1-1	23	Workplace accident prevention policy or management system	x			
ESRS S1-3	32c	Grievance/complaints handling mechanisms	x			
ESRS S1-14	88b and 88c	Number of fatalities and number and rate of work-related accidents	x		x	
ESRS S1-14	88e	Number of days lost to injuries, accidents, fatalities or illness	x			Phase-in option utilized
ESRS S1-16	97a	Unadjusted gender pay gap	x		x	Not material
ESRS S1-16	97b	Excessive CEO pay ratio	x			Not material
ESRS S1-17	103a	Incidents of discrimination	x			
ESRS S1-17	104a	Non-respect of UNGPs on Business and Human Rights and OECD guidelines	x		x	
ESRS 2 SBM-3 — S2	11b	Significant risk of child labour or forced labour in the value chain	x			
ESRS S2-1	17	Human rights policy commitments	x			
ESRS S2-1	18	Policies related to value chain workers	x			
ESRS S2-1	19	Non-respect of UNGPs on Business and Human Rights and OECD guidelines	x		x	
ESRS S2-1	19	Due diligence policies on issues addressed by the fundamental International Labour Organization Conventions 1 to 8			x	
ESRS S2-4	36	Human rights issues and incidents connected to its upstream and downstream value chain	x			

Disclosure requirement	Data point	Name	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference
ESRS S3-1	16	Human rights policy commitments	x			
ESRS S3-1	17	Non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines	x		x	
ESRS S3-4	36	Human rights issues and incidents	x			
ESRS S4-1	16	Policies related to consumers and end-users	x			Not material
ESRS S4-1	17	Non-respect of UNGPs on Business and Human Rights and OECD guidelines	x		x	Not material
ESRS S4-4	35	Human rights issues and incidents	x			Not material
ESRS G1-1	10b	The United Nations Convention against Corruption	x			
ESRS G1-1	10d	Protection of whistleblowers	x			
ESRS G1-4	24a	Fines for violation of anti-corruption and anti-bribery laws	x		x	Not material
ESRS G1-4	24b	Standards of anti-corruption and anti-bribery	x			Not material

## Appendix 2. Taxonomy reporting templates

### Reporting template turnover

Economic Activities	Code	2024/25		Substantial Contribution Criteria						DNSH criteria ("Does Not Significantly Harm")						Minimum safeguards	Proportion of taxonomy-aligned (A.1) or eligible (A.2) turnover, FY 2023/24	Category enabling activity	Category transitional activity
		Turnover	Proportion of turnover, FY 2024/25	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity				
		in € thousand	in %	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	in %	E	T
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																			
<b>A.1 Environmentally sustainable activities (taxonomy-aligned)</b>																			
Turnover of environmentally sustainable activities (taxonomy-aligned) (A.1)		0	0	0	0	0	0	0	0								0		
Of which enabling		0	0	0	0	0	0	0	0								0	E	
Of which transitional		0	0	0													0		T
<b>A.2 Taxonomy-eligible, but not environmentally sustainable activities (not taxonomy-aligned activities)</b>																			
Turnover of taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities) (A.2)		0	0	0	0	0	0	0	0								0		
<b>A. Turnover of taxonomy-eligible activities (A.1 + A.2)</b>		0	0	0	0	0	0	0	0								0		
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																			
Turnover of taxonomy-non-eligible activities		18,171,053	100																
<b>TOTAL</b>		<b>18,171,053</b>	<b>100</b>																

Share of turnover/total turnover

	Taxonomy-aligned per target	Taxonomy-eligible per target
CMM (Climate change mitigation)	0.0 %	0.0 %
CCA (Climate change adaptation)	0.0 %	0.0 %
WTR (Water and marine resources)	0.0 %	0.0 %
CE (Circular economy)	0.0 %	0.0 %
PPC (Pollution prevention and control)	0.0 %	0.0 %
BIO (Biodiversity)	0.0 %	0.0 %

## Reporting template OpEx

Fiscal year 2024/25	2024/25		Substantial Contribution Criteria							DNSH criteria (do no significant harm)							Proportion of taxonomy-aligned (A.1) or taxonomy-eligible (A.2) OpEx, FY 2023/24		Category enabling activity	Category transitional activity
	Code	OpEx	Proportion of turnover, FY 2024/25	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Minimum safe-guards	in %	E		
Economic Activities		in € thousand	in %	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																				
<b>A.1 Environmentally sustainable activities (taxonomy-aligned)</b>																				
OpEx of environmentally sustainable activities (taxonomy-aligned) (A.1)		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Of which enabling		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	E
Of which transitional		0	0	0															0	T
<b>A.2 Taxonomy-eligible, but not environmentally sustainable activities (not taxonomy-aligned activities)</b>																				
OpEx of taxonomy-eligible, but not environmentally sustainable activities (not taxonomy-aligned activities) (A.2)		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>A. OpEx of taxonomy-eligible activities (A.1 + A.2)</b>		<b>0</b>	<b>0</b>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<b>0</b>	
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																				
OpEx of taxonomy-non-eligible activities		248,414	100																	
<b>TOTAL</b>		<b>248,414</b>	<b>100</b>																	

	Share of OpEx/total OpEx	
	Taxonomy-aligned per target	Taxonomy-eligible per target
CMM (Climate change mitigation)	0.0 %	0.0 %
CCA (Climate change adaptation)	0.0 %	0.0 %
WTR (Water and marine resources)	0.0 %	0.0 %
CE (Circular economy)	0.0 %	0.0 %
PPC (Pollution prevention and control)	0.0 %	0.0 %
BIO (Biodiversity)	0.0 %	0.0 %

## Reporting template CapEx

Fiscal year 2024/25	2024/25		Substantial Contribution Criteria							DNSH criteria ("Does Not Significantly Harm")						Minimum safeguards	Proportion of taxonomy-aligned (A.1) or taxonomy-eligible (A.2) CapEx, FY 2023/24	Category enabling activity	Category transitional activity
	Code	CapEx	Proportion of turnover, FY 2024/25	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity				
Economic Activities		in € thousand	in %	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	in %	E	T
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																			
<b>A.1 Environmentally sustainable activities (taxonomy-aligned)</b>																			
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	139	0	J	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0	E	
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	7,898	1	J	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	1	E	
CapEx of environmentally sustainable activities (taxonomy-aligned) (A.1)		8,037	1	1	0	0	0	0	0	Y	Y	Y	Y	Y	Y	Y	1		
Of which enabling		8,037	1	1	0	0	0	0	0								1	E	
Of which transitional		0	0	0													0		T
<b>A.2 Taxonomy-eligible, but not environmentally sustainable activities (not taxonomy-aligned activities)</b>																			
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	74	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0		
Construction of new buildings	CCM 7.1	134,698	17														0		
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	1,239	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0		
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	509	0														0		

Fiscal year 2024/25	2024/25		Substantial Contribution Criteria							DNSH criteria ("Does Not Significantly Harm")							Proportion of taxonomy-aligned (A.1) or taxonomy-eligible (A.2) CapEx, FY 2023/24		Category enabling activity	Category transitional activity
	Code	CapEx	Proportion of turnover, FY 2024/25	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Minimum safeguards	in %	E		
Economic Activities		in € thousand	in %	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N				
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	41	0														0			
Acquisition and ownership of buildings	CCM 7.7	454	0														0			
CapEx of taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities) (A.2)		137,015	18	18	0	0	0	0	0								0			
<b>A. CapEx of taxonomy-eligible activities (A.1 + A.2)</b>		<b>145,052</b>	<b>19</b>	19	0	0	0	0	0								<b>10</b>			
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																				
CapEx of taxonomy-non-eligible activities		625,542	81																	
<b>TOTAL</b>		<b>770,594</b>	<b>100</b>																	

Y – Yes, taxonomy-eligible activity also taxonomy-aligned with the relevant environmental target; N – No, taxonomy-eligible activity but not taxonomy-aligned with the relevant environmental target; N/EL – 'not eligible' activity taxonomy non-eligible with the respective environmental target

	Share of CapEx/total CapEx	
	Taxonomy-aligned per target	Taxonomy-eligible per target
CMM (Climate change mitigation)	1.0 %	17.8 %
CCA (Climate change adaptation)	0.0 %	0.0 %
WTR (Water and marine resources)	0.0 %	0.0 %
CE (Circular economy)	0.0 %	0.0 %
PPC (Pollution prevention and control)	0.0 %	0.0 %
BIO (Biodiversity)	0.0 %	0.0 %

### Taxonomy-aligned turnover counter

Economic activities, in € thousand	Turnover <sup>1</sup>	Quantitative breakdown			Proportion for own internal consumption
		Turnover from contracts with customers	Turnover from leases	Other sources of turnover	
<b>Only taxonomy-aligned activities</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

<sup>1</sup> There is no taxonomy-aligned turnover in the 2024/25 fiscal year.

### Taxonomy-aligned OpEx counter

Economic activities, in € thousand	OpEx <sup>1</sup>	Quantitative breakdown		
		R&D expenditures	Short-term leases	Other direct expenditures
<b>Only taxonomy-aligned activities</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

<sup>1</sup> There is no taxonomy-aligned OpEx in the 2024/25 fiscal year.

### Taxonomy-aligned CapEx counter

Economic activities, in € thousand	CapEx	Quantitative breakdown			CapEx plan
		a) Additions to property, plant and equipment, to internally generated intangible assets, including in a business combination or acquired, to investment property acquired or recognized in the carrying amount and, where applicable, to capitalized right of-use assets.	b) Additions related to acquisitions through business combinations	c) Expenses incurred in relation to Taxonomy-aligned economic activities and expenses as part of a CapEx plan	
CCM 7.3 Installation, maintenance and repair of energy efficiency equipment	139	139	0	0	0
CCM 7.6 Installation, maintenance and repair of renewable energy technologies	7,898	7,898	0	0	0

**Taxonomy-eligible activities at Aurubis | Allocation to environmental objective — Climate change mitigation**

	EU Taxonomy activity	Description of Aurubis activity
<b>7 – Construction and real estate activities</b>		
CCM 7.3	Installation, maintenance and repair of energy efficiency equipment	Individual renovation measures consisting of the installation, maintenance or repair of energy efficiency equipment
CCM 7.6	Installation, maintenance and repair of renewable energy technologies	Installation of photovoltaic systems for internal energy production, for example at the Pirdop site

**Activities related to nuclear energy and fossil gas**

Line	Activities	Yes/No
<b>Nuclear energy activities</b>		
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	No
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	No
<b>Fossil gas activities</b>		
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	No
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	No
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	No