

## Internal control and risk management system relating to the consolidated accounting process

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

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

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

### PROCESS AND RESPONSIBILITY

As the parent company, Aurubis AG prepares the Aurubis Group's consolidated financial statements. The financial reporting of the consolidated Group companies that are included in the consolidated financial statements takes place prior to this process. These Group companies prepare their financial statements locally and transfer them to the Corporate Accounting department via a defined uniform Group-wide data model. The Group companies are responsible for compliance with applicable Group-wide guidelines and procedures, as well as for the correct and timely execution of accounting processes and systems.

### MAIN PRINCIPLES

The internal control system based on the Group accounting process includes the following main principles:

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