

Aurubis Business Partner Code of Conduct

Sustainability is an integral part of Aurubis' Group strategy. We treat people, the environment, and the world's limited natural resources with care, with the objective of protecting our planet as much as possible and preserving it for future generations. We exhibit responsibility towards our employees, suppliers, customers, neighbors, investors, and all other stakeholders. This applies to the areas surrounding our sites and the communities in which we do business.

Within the entire Aurubis Group, we are committed to continuous improvement and to complying with the highest environmental, social, and governance standards in our business activities. Aurubis values its relationships with its business partners¹ worldwide and expects them to adhere to and promote the core values and principles of our Business Partner Code of Conduct.

Aurubis has participated in the United Nations Global Compact (UNGC) since the end of 2014 and supports its visions and objectives regarding human rights, labor rights, the environment, and business ethics. Aurubis expects its business partners to comply with the fundamental conventions of the International Labour Organization (the ILO), the United Nations' Universal Declaration of Human Rights, and with applicable national and local laws and regulations. This Business Partner Code of Conduct applies to all business partners of the Aurubis Group, including those of all of the subsidiaries that are majority-owned (> 50 %) by Aurubis. We only want to do business with partners who meet our own high environmental, social, and governance standards and who are fully committed to contributing to our sustainability ambition.

The Aurubis Business Partner Code of Conduct is based on current international reference documents and standards, including:

- » The United Nations Global Compact
- » The United Nations Universal Declaration of Human Rights
- » The International Labour Organization's (ILO's) Declaration on Fundamental Principles and Rights at Work
- » The Rio Declaration on Environment and Development (result of the United Nations Conference on Environment and Development 1992)
- » The United Nations Convention against Corruption
- » The United Nations Convention on the Rights of the Child
- » OECD Guidelines for Multinational Enterprises

¹ business partners = suppliers, customers, agents, sales representatives, and service providers

OUR REQUIREMENTS FOR BUSINESS PARTNERS:

1. Human rights and labor rights

1.1. HUMAN RIGHTS

Business partners shall respect the fundamental human rights of every employee, treating them with dignity, respect, and fairness. This applies to every type of employment.

1.2. CHILD LABOR

Business partners shall refrain from using or supporting any form of child labor.

1.3. FORCED AND COMPULSORY LABOR

Business partners shall not utilize, be involved in, or obtain an advantage from any forced or compulsory labor. Business partners shall ensure that all work is voluntary.

1.4. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Business partners ensure employees' rights of freedom of association and collective bargaining in accordance with local laws.

1.5. WORKING TIME AND REMUNERATION

Business partners ensure compliance with applicable laws and industry standards on collective bargaining agreements, working time, and remuneration. Compensation and benefits should provide an adequate standard of living.

1.6. NON-DISCRIMINATION AND RESPECT FOR DIVERSITY

Business partners should support a culture free of harassment and discrimination. They refrain from discrimination based on ethnic origin, nationality,

social background, gender and gender identity, sexual orientation, age, disability, religion, political affiliation, or union membership. Business partners should create an inclusive work environment respecting the diversity of their employees and the members of the surrounding community. Business partners do not tolerate any form of abuse, intimidation, or violence.

1.7. LOCAL COMMUNITIES AND INDIGENOUS PEOPLE

Business partners are conscientious when interacting with the local communities, including indigenous people and landowners, ensuring their rights, livelihoods, resources, and cultural heritage and acting respectfully and fairly towards them. This includes the right of free, prior, and informed consent ([FPIC](#)).

1.8. SECURITY PRACTICE

If business partners are working with security personnel or services, they make sure that human rights and international standards on using force are respected.

2. Occupational health and safety

Business partners comply with our ambitious health and safety standards and demonstrate a proactive approach to occupational health and safety. Business partners identify, assess, and eliminate or mitigate potential risks to workers' health and safety, including contractors, during their activities.

3. Environment

3.1. ENVIRONMENTAL REGULATIONS

Business partners comply with the applicable requirements in environmental law.

3.2. ENVIRONMENTAL IMPACT

Business partners conduct business in a responsible way as regards environmental risks and impact. Aurubis expects its business partners to establish and maintain processes and procedures to minimize environmental impact and risks and to continuously improve environmental performance. This relates to (but not exclusively) resource efficiency, including water use; emissions to air, soil, and water; waste reduction and disposal; and noise protection. Business partners are expected to appropriately communicate these requirements to their employees and to provide training to enable everyone to work in an environmentally compatible way.

3.3. CARBON EMISSIONS AND ENERGY

Business partners continuously strive to minimize greenhouse gas emissions in line with the Paris Agreement (limiting global warming to 1.5 degrees by achieving a carbon-neutral world by 2050), to use renewable energy, and to continuously improve energy efficiency. Aurubis encourages its business partners to track and document energy consumption and all relevant Scope 1 and Scope 2 greenhouse gas emissions and to share the data with the value chain.

3.4. RECYCLING

For us, recycling is a priority and we expect our business partners to fully exploit their recycling potential and to promote recycling in their activities.

3.5. BIODIVERSITY

We expect our business partners to protect natural ecosystems and halt the conversion and degradation of natural ecosystems.

4. Business integrity

4.1. ANTI-CORRUPTION

Business partners shall work against corruption in all its forms.

4.2. FAIR COMPETITION

Business partners shall comply with competition and anti-trust laws.

4.3. CONFLICTS OF INTEREST

Business partners take appropriate precautions to avoid relations, activities, or business undertakings in which any private interests or relationships have influenced or have the potential to influence a business decision.

4.4. MONEY LAUNDERING

Business partners comply with applicable laws governing the prevention of money laundering.

4.5. TAXES, FEES, AND ROYALTIES

Business partners make sure that all mandated taxes, fees, and royalties connected to activities such as trade, export, and mineral extraction are paid to governments.

4.6. CONFIDENTIAL AND PROPRIETARY INFORMATION

Our business partners should protect confidential and any other proprietary information that is obtained in the course of the business relationship with us. Our business partners should observe applicable data privacy and information security requirements when handling information.

5. Responsible sourcing of minerals

We expect business partners to take necessary steps to identify and assess risk in their supply chains. We require our suppliers to comply with the [OECD Due Diligence Guidance for Responsible Supply Chains](#) including Annex II, to fulfill their due diligence obligations along the supply chain with regard to the sourcing and transport of conflict minerals, and to submit reports, documentation, or written assurances on request. Business partners shall ensure that conflict minerals are not sold to Aurubis.

6. Alert procedure

If business partners suspect that there has been a violation of the law or a breach of this code or of other Aurubis rules and policies across Aurubis' value chain, they can report this using the external, independent [Aurubis Compliance Portal \("whistleblower hotline"\)](#). Contact information for compliance issues can be found on the Aurubis homepage under "Compliance." Business partners inform and encourage their employees to contact this whistleblower hotline to report breaches in the implementation and enforcement of the standards of the Aurubis Business Partner Code of Conduct.

We expect business partners to provide anonymous and confidential grievance mechanisms to employees and other parties across the value chain and to protect the notifier from retribution, retaliation, and reprisal.

7. Implementation and monitoring

Business partners comply with this code, and they have established a suitable process to confirm their compliance with this code. Business partners provide transparent documentation upon Aurubis' request. To verify compliance, Aurubis reserves the right to request and view information and data.

Based on the OECD Due Diligence Guidance, if Aurubis has any doubt about the business partner's compliance with the Business Partner Code of Conduct, Aurubis can request an audit at the business partner's operations and facilities. Should Aurubis conclude that a business partner does not comply with this Business Partner Code of Conduct, Aurubis will enter into a dialogue with the business partner to outline targets and to drive and support improvements. Business partners communicate these fundamental principles and requirements to their own business partners and encourage them to observe these standards. Non-fulfillment of the targets and failure to implement improvements can lead to penalty measures, including the termination of the business relationship.



If you have any questions, please send an e-mail to responsibility@aurubis.com.

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