

Aurubis Human Rights Commitment

Business model and background

Aurubis AG is a leading global provider of non-ferrous metals and one of the largest copper recyclers worldwide. As an integrated group, we process complex metal concentrates, scrap metals, metal-bearing recycling raw materials, and industrial residues into metals of the highest purity. In addition to our main metal, copper, our metal portfolio includes gold, silver, lead, nickel, tin, zinc, minor metals such as tellurium and selenium, and platinum group metals. The portfolio also includes additional products such as sulfuric acid, iron silicate, and synthetic minerals. The company is based in Hamburg, Germany, where its headquarters and key production facilities are located. Most of its other sites are located in Europe, with larger production centers in Germany, Belgium, and Bulgaria. Outside Europe, Aurubis also has a production site in the US, and a global sales and service network.

We process copper concentrates that are obtained from ores and are offered by mining and trading companies on the global market. Because we have no stakes in mines, we have to buy the necessary raw materials for our two primary smelters located in Germany and Bulgaria on the international market. Aurubis has a global, diversified supplier portfolio. We source a significant portion of our copper concentrates from South American countries such as Peru, Chile, and Brazil. Most of the copper scrap and metal-bearing recycling raw materials for our secondary smelters are sourced in Germany and other EU countries.

For primary raw materials, we value long-term relationships and strategic cooperation with our suppliers. Compared to primary raw materials, secondary raw materials are largely purchased on the basis of short-term supply contracts.

About this Commitment

This Human Rights Commitment summarizes Aurubis' understanding of its human rights due diligence as well as the key elements of this obligation. This Commitment is directed to all employees, business partners, and other partners of the Aurubis Group.

We are committed to managing our business responsibly. Aurubis has become more international and has grown considerably in the last few decades. We take on the challenges that go along with this: sustainable conduct and economic activities are integral components of the company strategy.

Our understanding and guiding principles

We assume responsibility toward our employees, our suppliers, and our customers. This is also true for all of the areas surrounding our sites and for the communities where we are active. Respect for human rights is an important part of this responsibility and is reflected in our entrepreneurial understanding of values. This is why we have committed to supporting the protection of human rights in our area of influence and to guaranteeing international labor standards.

In our activities and business relationships, we do not want to be involved in, cause, or be complicit in human rights violations, either directly or indirectly. Our objective is to avoid any negative impacts on human rights and, where possible, to change them for the better. We consistently respect human rights at our sites and expect this from our business partners as well.

Aurubis follows the United Nations Guiding Principles on Business and Human Rights in accordance with the "Protect, Respect and Remedy" framework. We understand the responsibility for human rights as a

responsibility shared by all of the participants in the value chain. It is the obligation of states to protect human rights, just as it is incumbent upon economic actors to respect human rights in their business activities. In the case of human rights violations, both states and companies must ensure that remedial action is taken.

Integration into company practice

Respect for human rights has the highest priority for Aurubis in its business activities. The Executive Board bears responsibility for this issue. All Aurubis employees are obligated to respect human rights in their daily work and in all business decisions no matter what. Supervisors serve as role models in this regard. A certain sensibility and attention for possible risks related to human rights are expected of company functions that are especially affected by human rights issues. Aurubis uses the appropriate processes and systems for this purpose.

Our [Code of Conduct](#) and the company values, PRIMA, are the basis for our responsible conduct, including with regard to respect for human rights. Additional relevant policies include the Corporate Procurement Policy, the Corporate Gold and Silver Supply Management Guideline, the Corporate Anti-Corruption Compliance Policy, the Corporate Policy for Occupational Health and Safety, the Corporate Policy on Business Partner

Screening, the Corporate Policy on Compliance, the Corporate Policy on Environmental Protection, and the Data Protection Policies. In this context, the [Aurubis Business Partner Code of Conduct](#) and the General Terms and Conditions in particular apply to business partners.

Human rights approach in the supply chain

In our view, our responsibility for the respect of human rights extends into the supply chain because in some cases, our metal-bearing raw materials come from countries with a higher risk of human rights conflicts, non-compliance with social and environmental standards, or corruption. As part of our global sourcing of primary and secondary raw materials, we review possible impacts of our suppliers on the social environment, the natural environment, and economic aspects.

Our [Business Partner Code of Conduct](#) outlines clear expectations for our direct business partners. These include compliance with internationally recognized human rights as stated in the fundamental Conventions of the International Labour Organization (ILO) and the United Nations Universal Declaration of Human Rights, as well as adherence to the law and responsible, resource-efficient business management. If Aurubis comes to the conclusion that a business partner is not

Underlying standards and reference organizations

Our Human Rights Commitment is based on current international reference documents and standards, including:

- » the United Nations Global Compact,
- » the United Nations Universal Declaration of Human Rights,
- » the ILO (International Labour Organization of the United Nations) Declaration on Fundamental Principles and Rights at Work,
- » the Rio Declaration on Environment and Development (the result of the 1992 United Nations Conference on Environment and Development),
- » the United Nations Convention against Corruption,
- » the United Nations Convention on the Rights of the Child,
- » the United Nations Guiding Principles on Business and Human Rights and their national implementation,
- » the German federal government's National Action Plan for Business and Human Rights (NAP),
- » the OECD Due Diligence Guidance,
- » the requirements of the Dodd-Frank Wall Street Reform and Consumer Protection Act,
- » EU Regulation 2017/821 ("Conflict Minerals")
- » the London Bullion Market Association (LBMA) Responsible Gold Guidance & LBMA Responsible Silver Guidance

fulfilling these expectations, the company enters into a dialogue with the business partner to support improvements. Our business partners are called on to communicate these fundamental principles and requirements to their own business partners and to encourage them to follow these standards as well.

We have implemented Aurubis Business Partner Screening to fulfill our due diligence obligation. This screening process enables us to review our business partners with respect to their integrity and in relation to social and ecological criteria. The focus of the process is on the topics of compliance, corruption, human rights violations, and the environment.

We would like to promote respect for human rights along our value chain, which is one reason why we support appropriate industry solutions.

Incident reporting and complaint system

We call on all employees to report justified suspicion of discrimination or other human rights violations to their supervisors, the management of the company in question, the employee representatives, the responsible HR departments, the chief compliance officer, or our whistleblower hotline.

We also expect our business partners to inform us immediately about justified suspicion of human rights violations in connection with our business activities.

Anyone can report these types of violations confidentially and anonymously via the [Compliance Portal](#), also known as the whistleblower hotline, which is publicly accessible on our website. Every report is investigated. There are no disadvantages for a whistleblower who makes a report.

The Executive Board Chairman has approved the Aurubis Human Rights Commitment.



Roland Harings
Executive Board Chairman

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