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## Public Due Diligence Report for Responsible sourcing

Date: Feb 13<sup>th</sup>, 2023

Responsible senior manager: Peter Boeckx

Responsible manager: Vanessa Germonpré

### Company Information

Aurubis Beerse and Aurubis Berango are recycling and refining companies, valorizing complex non-ferrous secondary scrap and materials and returning metals (including Tin metal) back into the value chain.

Aurubis Beerse (CID 002773), located in Beerse (Belgium), was established in 1919 and Aurubis Berango (CID 002774), located in Berango (Spain), was established in 1991. Both companies work closely together using a unique technology and know-how, accepted as Best Available Technique, to minimize the impact of our activities on people, environment and climate.

Aurubis Beerse produces Copper, Lead and Tin materials and intermediates by smelting and refining complex low grade recycling materials (copper scrap, copper alloyed scrap, copper bearing ashes/residues/slag, tin and lead bearing scraps and residues, ...).

Aurubis Berango produces “black copper” from low grade copper bearing materials (ashes, residues, slag, copper/irony scrap, ...) in the same way as the “smelting process” of Aurubis Beerse. The black copper produced in Spain can be sold to third parties, but is normally further processed at Aurubis Beerse. Aurubis Berango also consumes lead-tin bearing materials for the production of solder shots, which are processed by Aurubis Beerse.

Aurubis Beerse is a member of the International Tin Association (ITA) and participates in the Responsible Minerals Initiative (RMI) RMAP audit program. Aurubis Beerse and Aurubis Berango hold ISO 9001, ISO 14001, ISO 45001 and ISO 50001 certifications.

Since June 1st, 2020 Aurubis Beerse (formerly Metallo Belgium) and Aurubis Berango (formerly Metallo Spain) are part of the Aurubis Group, a leading worldwide provider of non-ferrous metals, processing complex metal concentrates and diverse recycling raw materials. Aurubis is the global leader for copper recycling.

### RMAP Assessment Summary

Previous assessment against the Tin and Tantalum Standard (2017) under the Responsible Minerals Assurance Process (RMAP), took place on March 7-11, 2022 at Aurubis Beerse and Aurubis Berango for the audit period

1/1/2021 – 12/31/2021. Arche Advisors carried out the assessments (lead auditor: Mr. Max Basch, co-auditor: Mr. Kaido Katalsepp). The audit reports can be consulted on the website of RMI:

<http://www.responsiblemineralsinitiative.org/media/docs/Public%20Reports/Aurubis%20Beerse%20Public%20Report.pdf>

<http://www.responsiblemineralsinitiative.org/media/docs/Public%20Reports/Aurubis%20Berango%20Public%20Report.pdf>

Next RMAP assessment is scheduled on 9-10 March, 2023 in Beerse and 13-14 March, 2023 in Berango for the assessment period 1/1/2022 – 12/31/2022.

### **Company Supply Chain Policy**

Aurubis has developed and implemented a Supply Chain Policy in order to avoid the use of conflict minerals, which directly or indirectly finance or benefit armed groups or other serious human rights abuses in Conflict Affected and High-Risk Areas. The Supply Chain Policy is fully aligned with the third edition of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-risk Areas. It covers all the risks listed in Annex II of the Guidance.

We are committed to addressing these identified risks. Aurubis Beerse and Aurubis Berango have made the policy publicly available on the website and have communicated the policy to relevant stakeholders:

<https://www.aurubis.com/nl/beerse/downloads>, [https://www.aurubis.com/en/berango/Aurubis\\_Berango-Downloads](https://www.aurubis.com/en/berango/Aurubis_Berango-Downloads)

### **Company Management Systems**

#### **Management Structure and Responsibility**

Aurubis Beerse and Aurubis Berango are led by the board of directors and management team, who all are committed, each in their own responsibilities to the due diligence requirements covered by the policy.

The daily management of Aurubis Beerse and Aurubis Berango is in the hands of Managing Director Mr. Dirk Vandenberghe and Mr. Valentin Casado, respectively.

The company has assigned Mr. Peter Boeckx (Recycling Business Advisor) as due diligence program manager, supported by Ms. Vanessa Germonpré (Regulatory Affairs Manager), responsible to coordinate the work of all the relevant departments (including the Commercial Department, the Logistics Department, the Quality Department and the Sustainable Development Department) and to respond to any potential risks or red flags identified.

Once a year training is conducted for key staff from all relevant departments to increase awareness towards Responsible Sourcing in the supply chain. Two training sessions have been organized in September 2022 to involve a broad group of stakeholders, including but not limited to Customer Service, Commercial, Finance, Legal, Logistics, Quality and Production. If there is an update of the program, additional training is organized.

### Systems of Control and Transparency

Aurubis Beerse and Aurubis Berango have started to implement RMI's revised standard for tin and aligned its due diligence program further with the OECD Guidance as of May 2018, after the training held by RMI in Budapest. The Supply Chain Policy has been communicated to all direct suppliers and is publicly available on the website of Aurubis Beerse and Aurubis Berango.

Due diligence requirements have been incorporated via the Know Your Counterparty (KYC) inquiry and via agreements with direct suppliers. During visits at and meetings with direct suppliers, due diligence requirements and KYC are part of the conversation.

Aurubis refers to the Aurubis Compliance Portal to collect information on grievances from interested parties:

<https://www.aurubis.com/en/Responsibility/whistleblower-hotline>.

### Record Keeping System

All records relating to the supply chain like contracts and the due diligence program are maintained for at least 5 years and stored in the company database as stated in the management systems.

The program used by Aurubis Beerse and Berango is GAN software.

### Risk Assessment

Referring to the Supply Chain Policy, Aurubis Beerse and Berango aim at preventing or mitigating all risks identified in Annex II of the OECD Guidance:

- Serious abuses associated with the extraction, transport or trade of minerals;
- Direct or indirect support to non-state armed groups;
- Direct or indirect support to public or private security forces who control mine sites, transportation routes and upstream actors;
- Bribery and fraudulent misrepresentation of the origin of minerals;
- Money laundering;
- Payments of taxes, fees and royalties to governments.

A few steps have been implemented to identify these risks in the supply chain.

In a first step, Aurubis Beerse and Berango have implemented a Know Your Counterparty (KYC) due diligence procedure to include information concerning supplier legal status and identity and potential that any risks identified in Annex II of the OECD Guidance exist.

All suppliers have completed or will have to complete and return a KYC form before any transaction is possible. Incomplete information or inconsistencies in the KYC form will lead to a request to update the form before a transaction will take place.

In a second step, Aurubis Beerse and Berango have implemented a procedure to identify “Conflict Affected and High-Risk Areas” (CAHRAs) and to identify red flags in the supply chain. The procedure will apply to all suppliers of primary material. The procedure includes the resources used, the criteria to define a CAHRA and the frequency to review the procedure. The following resources are used to determine the CAHRAs:

- The Heidelberg Conflict Barometer: this indicator allows companies to detect the presence of armed conflict and violence through the use of an annually updated world listing of countries. The country or area which has a (sub)national ranking of 4 or higher in the region of origin or transit routes will be identified as CAHRA and transaction will be considered as a red flag.
- The Fragile States Index: this indicator detects risks of harm to human rights. The country (or sub-region) is classified as a CAHRA when the indicated score is 100 or higher.
- The EU CAHRA list: this is an indicative list of CAHRAs, assessed down to a subnational level, provided by the European Commission in the light of the Conflict Minerals Regulation (EU) 2017/821. This resource considers all non-EU countries.
- In addition, the following countries are classified as a CAHRA: the Democratic Republic of the Congo and its nine adjoining countries as outlined in Section 1502 of the Dodd Frank Act.

All high-risk countries are registered in an overview “List of CAHRAs”. This list will be applicable to the country of origin and transit routes. The CAHRA list for Aurubis Beerse and Berango has been reviewed in July 2022.

It is the intention and policy at Aurubis Beerse and Berango not to source primary material from a CAHRA. Not only to prevent from sponsoring and promoting conflicts, armed groups or human rights violations, but also to prevent from the required assessments when sourcing from CAHRAs.

#### Identified risks

Aurubis Beerse: there were no risks identified at Aurubis Beerse.

Aurubis Berango: there were also no risks identified at Aurubis Berango.

#### In general

It should be noted that of all sourced material at Aurubis Beerse and Berango, only less than 1% of the total sourced shipment weight is non-secondary material.

As stated above, Aurubis Beerse and Berango will not source primary material from CAHRAs. In such rare case where this would happen, Aurubis Beerse and Berango will follow the high-risk sourcing methodology and chain of custody assessment as described in the OECD Guidance. For this, all primary material sourced from a CAHRA would be classified as high-risk.

#### Risk Assessment (high-risk sourcing only)

Not applicable