

# 2023 Aurubis Modern Slavery and Human Trafficking Statement

This Modern Slavery and Human Trafficking Statement has been published in accordance with section 54(1) of the UK Modern Slavery Act 2015. It sets out the steps Aurubis took during fiscal year 2022/23 (October 1, 2022—September 30, 2023) to identify and address modern slavery and human trafficking risks.

This statement is published for Aurubis AG and on behalf of the Aurubis Group companies. Although not all Aurubis Group companies are subject to the Act, Aurubis takes a Group-wide approach to its human rights commitments.

## Organizational structure and supply chains

As a world leader in copper recycling and supplier of non-ferrous metals, we process complex metal concentrates, scrap metals, organic and inorganic metal-bearing recycling raw materials, and industrial residues into metals of the highest purity. We produce more than one million tons of copper cathodes annually, and from them a variety of copper products, such as wire rod, continuous cast shapes, and flat rolled products. In addition to our main metal, copper, our metal portfolio also includes gold, silver, lead, nickel, tin and zinc, along with minor metals, such as tellurium and selenium, and platinum group metals. Sulfuric acid, iron silicate, and synthetic materials round out the product portfolio.

The company headquarters, also home to one of our two primary smelters, are in Hamburg, Germany. Most of our sites are in Europe, with major production units in Germany, Belgium, Bulgaria and Spain, as well as cold rolling mills for flat rolled products and rod plants along with a casting line in Germany and in other European countries. Outside Europe, Aurubis also has one production site in the US, and a global sales and service network.

We process copper concentrates that are obtained from ores and are sold by mining and trading companies on the global market. The necessary feed materials for our two primary smelters in Hamburg (Germany) and Pirdop

(Bulgaria) are purchased worldwide. Aurubis holds no stakes in mines and has a globally diversified supplier portfolio. We source a significant portion of our copper concentrates from South American countries, such as Peru, Chile and Brazil. We also purchase raw materials from other countries, i.e., Bulgaria, Indonesia and Turkey. Most of the copper scrap and metal-bearing recycling raw materials for our four secondary smelters in Lünen (Germany), Olen and Beerse (both in Belgium), and Berango (Spain) are sourced on the European and North American markets. When sourcing primary raw materials, we particularly value long-term relationships and strategic cooperation with our suppliers. Compared to primary raw materials, secondary raw materials are largely purchased based on short-term supply contracts, which is customary for the market.

For further details on our products and company structure, please see the [Aurubis 2022/23 Annual Report](#).

## Policies related to modern slavery and human trafficking

We respect human rights and advocate for their protection. We follow the United Nations Guiding Principles on Business and Human Rights in accordance with the “Protect, Respect and Remedy” framework.

The Executive Board and the Managing Directors of our subsidiaries bear responsibility for upholding human

rights in our business activities, while human rights risk management in the supply chain is overseen by the Executive Board. Furthermore, to monitor human rights-related risk management in accordance with the requirements of the German Supply Chain Due Diligence Act, two committees were established in FY 2022/23 that perform the role of the Human Rights Officer in the Aurubis business area and supply chain. This monitoring includes modern slavery risk management. The “Corporate Sustainability and External Affairs” department is represented on both committees and acts as an interface. The committees inform the Executive Board regarding the outcomes of the risk monitoring on a regular basis.

Adherence to the recognized core labor standards set out by the International Labour Organization (ILO), labor law provisions, and applicable labor standards and laws is fundamental to us.

We have participated in the United Nations Global Compact since 2014 and are committed to working towards implementing its ten principles related to human rights, labor standards, the environment, and anti-corruption. We have pledged to comply with the Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas to promote responsible supply chains.

The **Aurubis Code of Conduct** requires all Aurubis’ employees to respect human rights in their daily work and in all their business decisions.

The **Aurubis Policy Statement on Respecting Human Rights and Environmental Obligations** in accordance with Section 6 (2) of the German Supply Chain Due Diligence Act summarizes the Aurubis human rights strategy. It describes the processes at Aurubis for complying with legal obligations along with a portrayal of the human rights and environmental risks in our own business area and the supply chain identified during an annual risk analysis as well as the resulting expectations towards our employees and suppliers.

The **Aurubis Business Partner Code of Conduct** outlines our environmental, social and governance standards for business partners. Adherence to these standards is the key prerequisite for our successful collaboration with business partners. In addition, to obtain contractual safeguards from our suppliers, we have included human rights, environmental and security clauses in all our long-term primary raw materials contracts.

Our **Corporate Responsible Sourcing Policy** establishes the Group-wide sourcing rules and ensures a uniform, risk-oriented supplier identity/integrity and supply chain screening process. The new Corporate Responsible Sourcing Policy entered into force on August 1, 2023. The policy is based on and aligned with the five-step framework of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, the Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel and Zinc of The Copper Mark, the EU Conflict Minerals Regulation 2017/821, the LBMA Responsible Gold and Silver Guidance, the Responsible Minerals Assurance Process (RMAP) Tin and Tantalum Standard, and the German Supply Chain Due Diligence Act.

We call on all our employees to report justified suspicion of human rights violations via our Compliance Portal and the **whistleblower hotline**. We expect our stakeholders in the supply chain to do the same. The anonymity of the whistleblower vis-à-vis Aurubis is guaranteed in all cases. All information is consistently followed up and the whistleblower is informed about the progress of the procedure.

### **Due diligence processes, risk assessment and management**

The risk assessment in our own business area as well as the supply chain is divided into an abstract and a concrete risk analysis. The abstract risk analysis in the supply chain assesses both country and sector/material-specific risks. The risk analysis in our own business area accounts for the various rightsholders and their corresponding activities and roles at Aurubis. The results of this risk analysis serve to direct our focus on potential human rights and/or environmental risks that may arise either from our own business activities at our sites or in our supply chain.

In the scope of the concrete annual risk analysis, our current business partners are checked by means of an IT-supported screening tool (Business Partner Screening). This process is also mandatory for all our new business partners, whereby the level of detail of the screening is determined for each business partner depending on the initial risk assessment. If business partners are initially classified as medium or high risk, a detailed screening is carried out. The latter consists of a query of sustainability criteria and screening reports from an external provider that cover compliance, financial and Environmental-Social-Governance (ESG) aspects. The Group departments “Compliance” and “Corporate Sustainability & External Affairs” are involved in the detailed screening of medium- and high-risk business partners.

If potential risks or concrete human rights or environmental violations are identified during the detailed screening, measures are defined to obtain further information on the potential risks, mitigate concrete risks, cease or remedy the violation. Possible approaches include requesting a statement from the business partner about the situation on the ground as well as respective proofs, engaging in a local stakeholder dialogue, or conducting an on-the-ground assessment by Aurubis employees or by a third party. As a last step, we might decide not to enter or to terminate the business relationship if the preceding measures prove ineffective.

### **Effective action taken to address modern slavery**

Our prioritized human rights risks for fiscal year 2022/23 can be accessed in the Aurubis Policy Statement on Respecting Human Rights and Environmental Obligations in accordance with the German Supply Chain Due Diligence Act. More extensive information on all identified human rights risks and violations, including the measures developed, are published in the Aurubis Annual Report for fiscal year 2022/23 to the Federal Office for Economic Affairs and Export Control (BAFA).

The Executive Board Chairman has approved the Aurubis Modern Slavery and Human Trafficking Statement.

### **Roland Harings**

Executive Board Chairman

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