



# CODE OF CONDUCT

# CONTENTS

**FOREWORD** ..... 3


 **OUR ASPIRATION** ..... 4

We ask ourselves the right questions ..... 7  
Speak up: Expressing concerns ..... 8


 **VALUES** ..... 9

Performance – means commitment! ..... 10  
Responsibility – means decisions! ..... 10  
Integrity – means maintaining trust! ..... 10  
Openness – means curiosity! ..... 10  
Appreciation – means real interest! ..... 10


 **CONDUCT GUIDELINES** ..... 11

 **Employees** ..... 13  
Respect for human rights and anti-discrimination ..... 13  
Fair working conditions ..... 15  
Occupational health and safety ..... 17

 **Environment and supply chain** ..... 19  
Environmental and climate protection ..... 19  
Sustainable sourcing ..... 21

 **Safety** ..... 22  
Plant and product safety ..... 22  
Data protection and information security ..... 24  
Protecting business secrets and intellectual property ..... 26

 **Business integrity** ..... 27  
Fair competition ..... 27  
Countering corruption and bribery ..... 29  
Conflicts of interest ..... 31  
Insider dealing ..... 33  
Trade, tax, and customs regulations ..... 34  
Combating money laundering ..... 35  
Proper accounting and documentation ..... 36  
Handling company resources ..... 37

 **Our role in the public domain** ..... 38  
Social engagement ..... 38  
Appearing in the public domain ..... 40  
Political lobbying ..... 42

Imprint ..... 43



**Aurubis needs to be a reliable partner of integrity for its stakeholders at all times. However, this only works if each one of us lives this integrity every day.**

# FOREWORD

With sites in more than 20 countries on three continents and over 7,200 employees worldwide, Aurubis is a relevant player in the international basic materials industry. We have a wide range of activities: we process complex metal concentrates, scrap metals, organic and inorganic metal-bearing recycling materials, and industrial residues into metals of the highest quality. When it comes to recycling, we make a meaningful contribution to the circular economy. We have a broad responsibility as a result – to the environment, the neighborhoods near our production sites, the regions where we source raw materials, business partners, our shareholders, and, especially, our employees.

We underline our commitment to this responsibility in the company strategy, which we recently updated with the company's future firmly in mind – Metals for Progress: Driving Sustainable Growth. The objective is clear: we will continue solidifying our position as the most efficient, sustainable integrated smelter network worldwide. Together, we will position Aurubis as a multimetal company, fit for the future, because our metals are in demand – for the energy transition, electric vehicles, closing material cycles, and other megatrends. The key areas of our company strategy are securing and strengthening our core business, pursuing growth options, and expanding our role as industrial forerunner in sustainability.

Aurubis needs to be a reliable partner of integrity for its stakeholders at all times. However, this only works if each one

of us lives this integrity every day. In the course of revising the strategy and after integrating the new sites, we reviewed the existing Aurubis Code of Conduct and revised it to reflect our aspirations. This is the result – the Aurubis Code of Conduct, which serves as an overall guide on exemplary conduct for all employees around the world, at all levels of the company.

In addition to the Aurubis values, this Code of Conduct also includes conduct guidelines that everyone has to follow to ensure that their actions comply with the law and internal regulations. They pertain to employees, the environment and the supply chain, safety, business integrity, and our public role.

Aurubis looks back at a company history spanning over 155 years, but we're not standing still. On the contrary: the environment, the markets, and society have continued to change significantly in the last several years. We acknowledge this by doing everything to make sure Aurubis can continue to solidify and expand its excellent reputation as a multimetal company and employer, as a neighbor and exchange-listed company – with your support.

I therefore ask that you familiarize yourself with this Code of Conduct and always align your actions to our values and rules in your everyday work.

Sincerely,  
Roland Harings, Chief Executive Officer

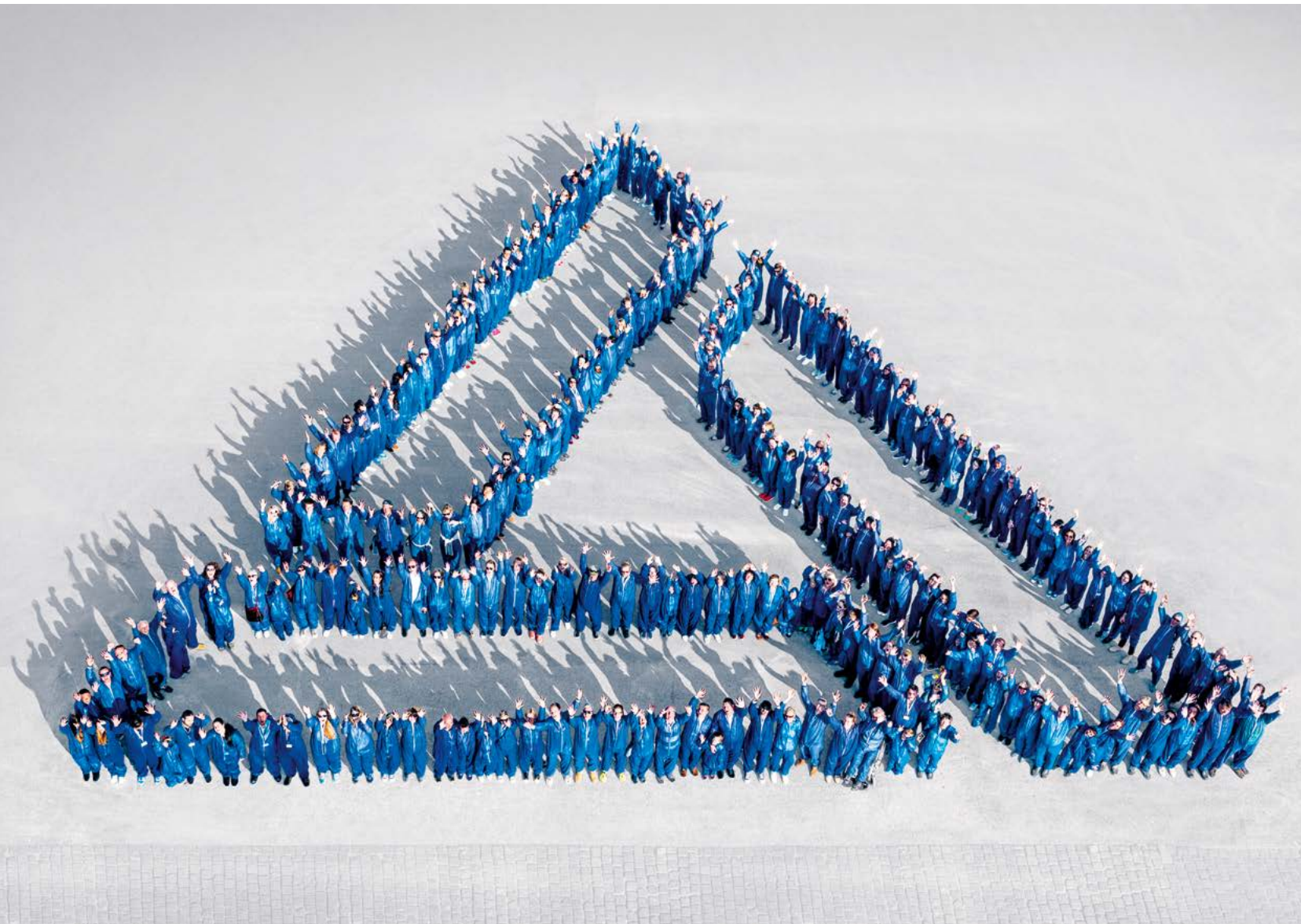


# OUR ASPIRATION

**We share the responsibility of securing Aurubis' position now and in the future. We are all responsible for Aurubis' success and good reputation. We act in accordance with our social and political obligation to conduct ourselves in alignment with laws and standards.**







## Together, we create value for society.

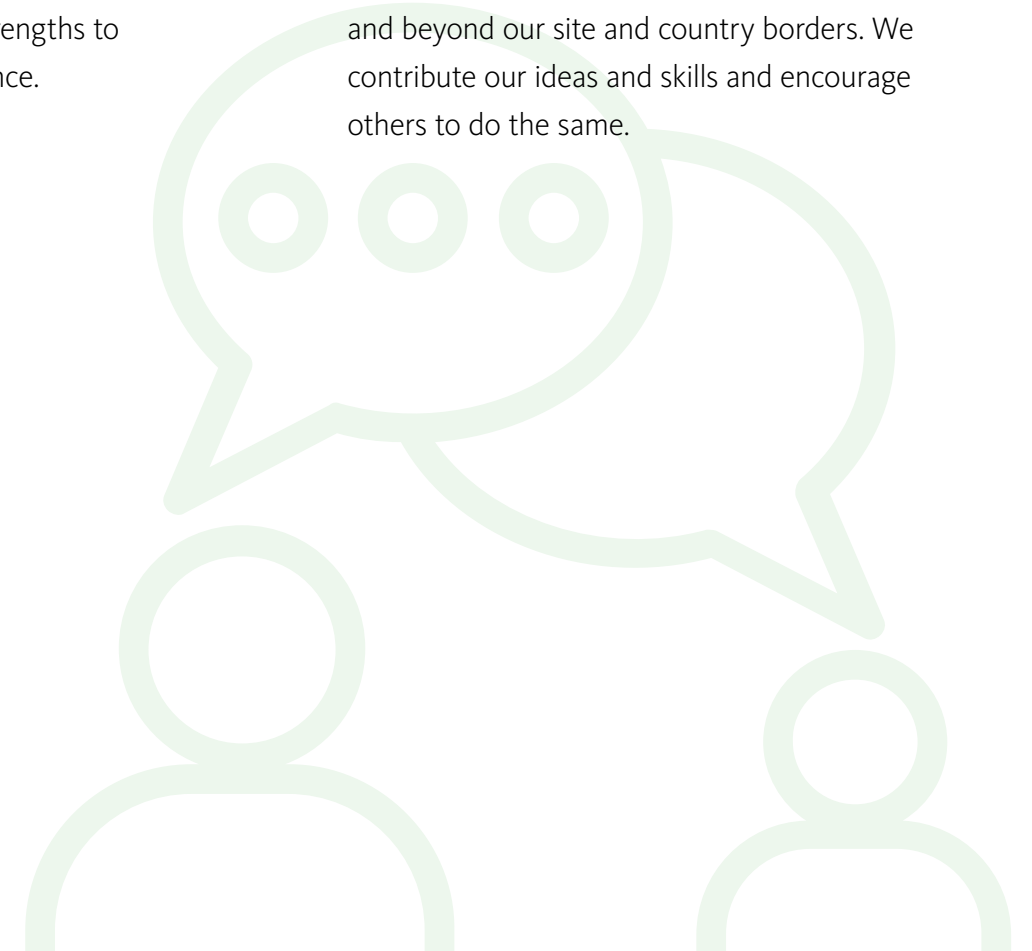
With its products and services, Aurubis serves a society that handles resources responsibly and practically. Together, we transform raw materials into metals to not only make the world more innovative, but also to conserve it for future generations.

As a result, we form a team that works toward the company's ongoing progress – even in challenging times. We combine our personal strengths to achieve a first-class team performance.

## We are successful together because as individuals, we always have the big picture in mind.

In all of our decisions and actions, we never lose sight of Aurubis' strategy.

Together, we create a work environment that is characterized by our openness and ability to learn from each other, both in our own departments and beyond our site and country borders. We contribute our ideas and skills and encourage others to do the same.







## We are committed to a work environment of respect and trust.

We value our employees and business partners, mutual dialogue on equal terms, and controversial discussions and questions. They offer us the opportunity to change our perspective and see new aspects. We admit mistakes promptly and communicate them. Aurubis believes that companies with a good error culture are faster and more innovative in making better and correct decisions.

## We serve as an example.

We are aware of this role, whether as supervisors to employees or as employees with our fellow colleagues, and we lead by example by putting Aurubis' basic principles into practice and by observing and following the rules and guidelines. This helps us encourage others to conduct themselves responsibly and in compliance with the law at all times.

Supervisors are committed to an open leadership culture based on dialogue, and employees are always welcome to approach us with questions.



## We take advantage of the opportunities offered by digitalization to continuously improve ourselves.

As a forward-looking company, we identify the opportunities and pathways of digitalization early on and seize these possibilities to secure Aurubis' long-term success. We implement digital projects swiftly and develop the skills they require.



This Code of Conduct applies to all Aurubis employees worldwide. Our contractors, service providers, and other external companies are also required to follow this Code of Conduct and the related regulations for external companies when they are on Aurubis premises or are under the supervision, management, or oversight of Aurubis. Our business partners (suppliers, customers, commercial agents, and service providers) affirm the Aurubis Business Partner Code of Conduct.



# WE ASK OURSELVES THE RIGHT QUESTIONS

Do I have all of the information  
necessary to make a decision?

Do my actions reflect  
the values and the spirit of the  
Aurubis Code of Conduct?

Would I want to see my decision  
publicized in the news?

Is this decision or measure legal,  
ethically correct, and socially and  
ecologically responsible?

Can I honestly and reasonably  
defend my decision?

What are the consequences  
of my actions or my inaction on Aurubis  
and its reputation?

**If I feel uncomfortable, I pause for a moment  
and question my decision. If I continue to have  
doubts, I ask for advice.**





## SPEAK UP: EXPRESSING CONCERNS

**Aurubis benefits as a company when employees express their opinions and views and openly address behavior that contradicts this Code of Conduct.**

### We openly express concerns.

We pay attention to concerns and feelings of discomfort. By talking about concerns and uncertainties, we prevent possible cover-ups or minimize negative impacts and further damage.

If we observe violations of the rules of this Code of Conduct or we're not sure whether certain behavior aligns with this Code of Conduct, we can contact our supervisors, the relevant departments such as Environmental Protection, Health & Safety, HR, or Corporate Legal Affairs, those responsible for Plant Security, or the employee representatives at any time.

Furthermore, we can contact the chief compliance officer or the local compliance officers at the sites if we observe violations of this Code of Conduct, confidentially if desired.

### Concerns can be expressed anonymously as well.

Employees, business partners, and other third parties can confidentially and anonymously report indications of possible legal violations, violations of this Code of Conduct, or other activities that could harm the company through our Group-wide whistleblower hotline at [www.aurubis.com/en/whistleblower-hotline](http://www.aurubis.com/en/whistleblower-hotline) or through the reporting mechanisms in place at the sites. There is no disadvantage for the whistleblower for making a report. The whistleblower's anonymity is protected no matter what. All tips the hotline receives, for example regarding possible cases of corruption, discrimination, or violations in the supply chain, are investigated.







# VALUES

**Our values guide our actions, shaping our daily work. They influence the way we interact with each other and our conduct toward business partners.**



# Heading into the future with shared values ...

## Performance – means commitment!

- » We are high-performing and are experts in what we do.
- » We combine our personal strengths to achieve a first-class team performance and work together closely and actively across country borders, hierarchies, divisions, and roles.
- » We work together at consistently improving ourselves.

## Responsibility – means decisions!

- » We assume individual responsibility, seek out challenges, and take initiative.
- » We are growing as a company group, taking responsibility for our actions, our health, occupational safety, the environment, and society in the process.
- » We are reliable and stand up for each other.

## Integrity – means maintaining trust!

- » We are a trustworthy, dependable partner.
- » We are honest and always follow the law.
- » We protect sensitive data.

## Openness – means curiosity!

- » We are open to changes and support their implementation.
- » We continuously improve ourselves through lifelong learning.
- » We're open to new approaches and creative solutions.

## Appreciation – means real interest!

- » We respect and appreciate the uniqueness of each individual.
- » We seek out a dialogue and share our knowledge.
- » We are open to new ideas and feedback from others.



# CONDUCT GUIDELINES

These conduct guidelines supplement our values and support us in knowing and following the legal and company-issued standards and regulations. We are obligated to act in accordance with these binding conduct guidelines.



Employees



Environment and supply chain



Safety



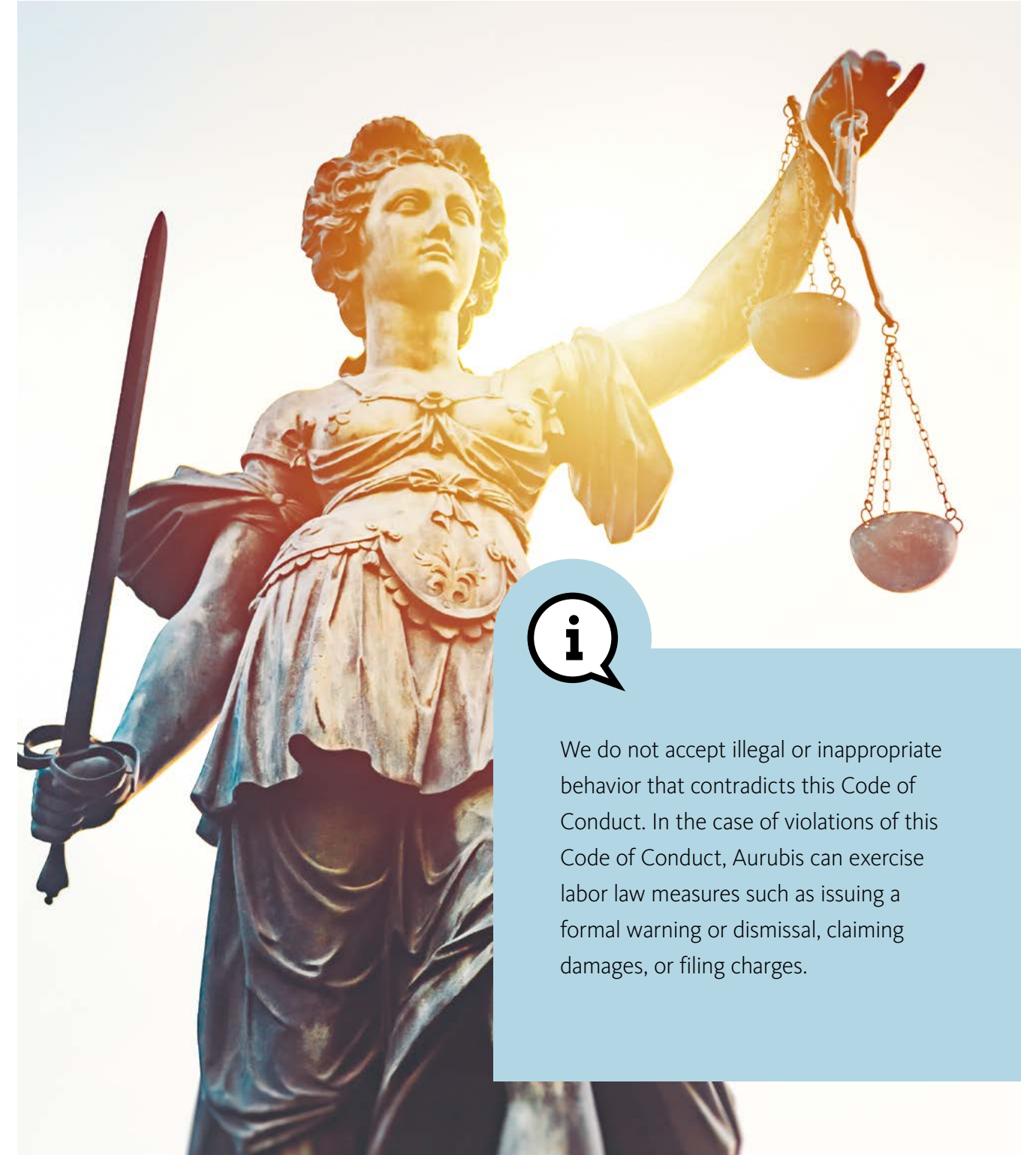
Business integrity



Our role in the public domain







In certain key areas, the conduct guidelines are fleshed out in company-wide corporate policies, which elaborate on the relevant responsibilities and processes, and detailed site-specific regulations such as operating instructions and directives. In the context of our continuous risk management, we ensure that any of the risks arising from the areas of activity described in this Code of Conduct are identified and addressed in a timely manner.

*We ensure that we know and follow the relevant national and international laws, as well as the internal policies and regulations, within the area of responsibility entrusted to us.*

Aurubis regularly trains its employees on the topics and areas of activity in this Code of Conduct. We take into consideration the information and content that we learn and internalize within the scope of training sessions.



We do not accept illegal or inappropriate behavior that contradicts this Code of Conduct. In the case of violations of this Code of Conduct, Aurubis can exercise labor law measures such as issuing a formal warning or dismissal, claiming damages, or filing charges.



## EMPLOYEES

# Respect for human rights and anti-discrimination

Respect for human rights is an important part of Aurubis' corporate responsibility toward its employees and business partners. This is also true for all of the areas surrounding our sites and for the communities where we are active. Aurubis has participated in the United Nations Global Compact since 2014 and is therefore committed to implementing its Ten Principles, which include human rights and the core labor standards of the International Labour Organization (ILO).

## We respect human rights and advocate for their protection.

We reject all forms of discrimination and handle individual and cultural diversity in our company with sensitivity. We do not tolerate forced labor or child labor, and we respect the rights of indigenous populations.

We advocate for equal opportunity and against unjustified unequal treatment. We are considerate to each other and respect the human rights and diversity of our colleagues and everyone we encounter in our work.







*We do not tolerate any form of discrimination, racism, intimidation, or violence. Bullying and sexual harassment are prohibited.*

Employees have the right to be protected against discrimination and harassment. At Aurubis, no one may be discriminated against, favored, harassed, or ostracized:

- » when it comes to hiring, compensation, in the course of their career, or in their interactions with others
- » for reasons of racism
- » due to their ethnic or social background
- » due to their gender or gender identity
- » due to their religion or ideology
- » due to a disability
- » due to their age
- » due to their family status
- » due to their sexual orientation



**Discrimination** refers to the unjustified unequal treatment of people and the related consequences, for instance when someone experiences disproportionate strain or is denied certain benefits instead of being treated fairly based on their personal merits. The equal treatment of people who are in different situations – such as those with physical limitations – can likewise be discriminatory. Discrimination can also include harassment.



**Sexual harassment** encompasses any verbal or physical conduct of a sexual nature that intends to infringe on someone's dignity or cause it to be infringed upon, especially if it creates an atmosphere of intimidation, humiliation, or insult, such as:

- » jokes about a person's sexual orientation or appearance
- » sending pictures, drawings, or messages with an explicit sexual reference to a person
- » intentional and unwanted physical contact.



**Bullying** is any ongoing conduct in a personal relationship that involves the humiliation and disparagement of a person with the goal of asserting dominance over him/her mentally, such as:

- » insulting, yelling at, or making fun of someone
- » excluding, ignoring, or passing over someone
- » assessing someone's work in a biased, unfair manner
- » criticizing someone in a derogatory way.



# Aurubis Awards 2021



## EMPLOYEES

### Fair working conditions

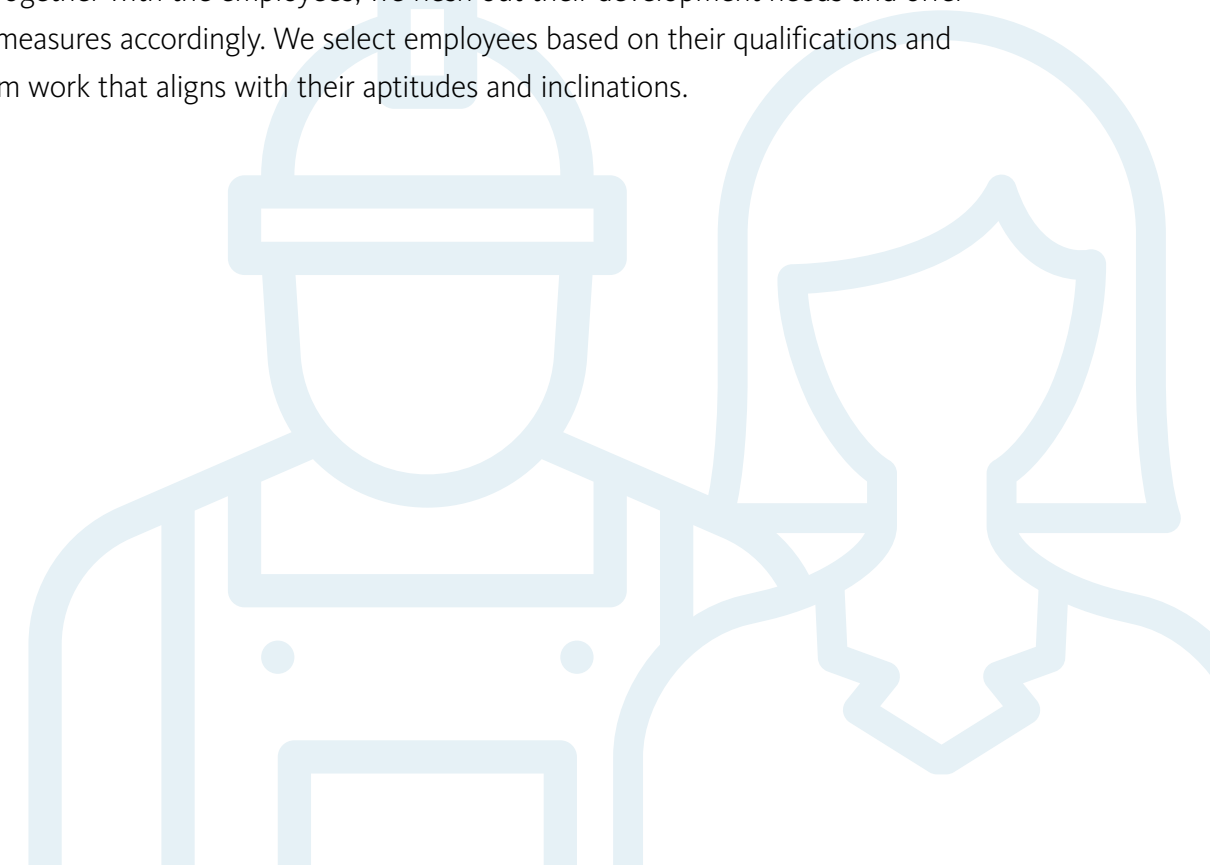
**Aurubis bears responsibility toward all of its employees, which is why we follow the applicable labor regulations, standards, and laws with respect to compensation, working hours, and general employee rights. With our commitment to the core labor standards of the [International Labour Organization \(ILO\)](#) and the [OECD Guidelines for Multinational Enterprises](#), Aurubis recognizes its employees' right to form, join, and be involved in unions and employee representative bodies within the context of national laws, collective wage agreements, and local customs.**

*We recognize and appreciate the performance of every individual employee – regardless of role and position.*

Aurubis observes the applicable laws on the minimum wage, working hours, protection of working mothers, vacation days, rest periods, and overtime. The compensation Aurubis pays corresponds to the legal requirements. We reward equal work with equal pay.

We acknowledge employees' and colleagues' working habits and performance with open, constructive feedback.

We are all lifelong learners and stay up to speed to successfully implement Aurubis' strategy, even as the overall parameters shift. Supervisors give employees leeway and help them become more successful. Together with the employees, we flesh out their development needs and offer them supporting measures accordingly. We select employees based on their qualifications and skills and give them work that aligns with their aptitudes and inclinations.







We pay attention to maintaining an attractive work environment for employees and assist them in achieving a good work-life balance.

As a result, we support more flexible, modern working time arrangements. Even though the legal and social parameters and the job requirements at the international Aurubis sites are very different in some cases, we address our employees' individual needs wherever possible.

We put good collaboration and quick, efficient communication between the company management and employees into practice. This good collaboration is evident in the reciprocal, open exchange of information and in mutual support. Supervisors and employees inform each other extensively about facts and business matters so that everyone involved can take action and make decisions in good time.



We uphold the right to freedom of association and the right to collective negotiations, and we are committed to the principle of employee co-determination.

We maintain close, constructive cooperation with the unions active in the company and the elected works council members.

In the case of organizational changes that lead to job cuts, we follow socially responsible principles and create measures to mitigate the consequences for employees who are dismissed. Employee representatives are always included in the implementation of organizational changes. We strive to avoid redundancies. If redundancies are unavoidable, we ensure a responsible termination process.





## EMPLOYEES

# Occupational health and safety

**The production and processing of non-ferrous metals require particular care when it comes to occupational health and safety. Aurubis doesn't distinguish between its own employees, contractors, or visitors in this respect.**

*In everything we do, occupational health and safety take the highest priority. Together, we pursue the goal of zero work-related accidents, injuries, and illnesses (Vision Zero).*

We follow the processes, work instructions, and operating instructions on safe processes that Aurubis prescribes, and we observe the preventative and precautionary measures that are necessary to minimize risks in the workplace.

The following principles apply:

- » All of us who work for, or on behalf of, Aurubis are responsible for our safety and health as well as the safety and health of those around us.
- » We only carry out work for which we are trained, authorized, and in the right frame of mind.
- » We have the obligation and authority to stop unsafe work.
- » We follow occupational safety rules and encourage others to do the same.







## We watch out for each other and share responsibility for occupational health and safety in our area.

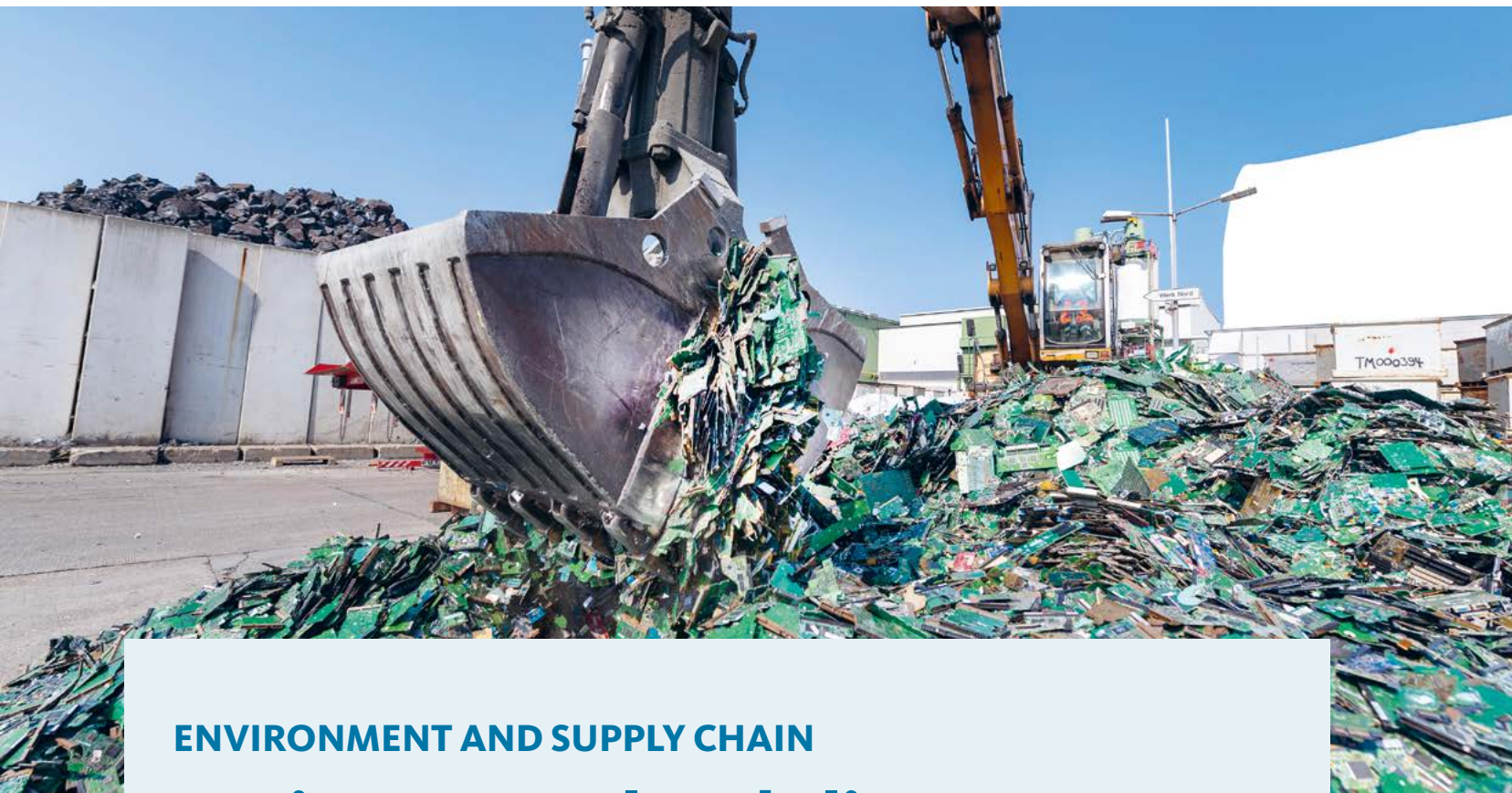
This includes keeping our workspace orderly and clean and reporting any defects in equipment or machinery. We consistently use the existing safety devices and the prescribed protective equipment, and we never work under the influence of alcohol or drugs.

We don't let up when it comes to following rules and regulations regarding occupational health and safety. In hectic situations or when routine starts to set in, we remind each other about safe procedures. We are aware of our role model function, whether as supervisors to employees or as employees with our fellow colleagues and others on the plant premises. We always lead by example.

In the case of accidents or injuries, we react immediately and alert the emergency services on duty. It's a matter of course for us to report every accident and to point out unsafe situations or near-misses to prevent possible incidents.







## ENVIRONMENT AND SUPPLY CHAIN

# Environmental and climate protection

**Aurubis has set ambitious goals for environmental and climate protection that extend beyond the legal requirements. We want to minimize the environmental impact of our business activities. This includes maintaining biodiversity and air, water, and soil quality in our plants and the surrounding areas, using energy efficiently, reducing CO<sub>2</sub> and noise emissions, conserving resources, and handling waste and hazardous substances responsibly.**

*We contribute to environmental and climate goals and to improving Aurubis' environmental performance.*

We work in an environmentally compatible manner. The following principles are particularly important:

- » We use resources sparingly and avoid waste wherever possible.
- » We properly recycle or harmlessly dispose of unavoidable waste.
- » We prioritize cleanliness in the production sectors, on the plant premises, and at every workstation.
- » We keep dust emissions to a minimum.







*We avoid environmental dangers for ourselves and the local surroundings with the necessary precautions to prevent incidents and operational disruptions.*

We put technical and organizational safeguards to use. If, despite all precautions, a substance is released, contamination occurs, or there is another accident or incident, we immediately alert the emergency services on duty and the company department responsible for environmental protection.

We select, inform, and advise contractors working for us in such a way as to ensure that laws and our environmental and climate protection standards are observed.

*We construct and operate production facilities in accordance with official permits.*

We observe the authorized limit values, requirements, and conditions and avoid releasing environmentally hazardous substances into the atmosphere, water, or soil without a permit. We regularly and systematically monitor environmental data and are transparent about the impacts of our processes on the environment and our environmental performance.

Qualified, authorized employees engage in an objective, open dialogue characterized by trust with the responsible governmental authorities and the public, such as the local communities, the neighborhood, the media, and NGOs. For instance, we involve members of the public within the context of permit procedures and environmental impact assessments.







## ENVIRONMENT AND SUPPLY CHAIN

# Sustainable sourcing

**Aurubis sources raw materials for its business worldwide, which can include regions that pose risks regarding compliance with sustainability standards. We are aware of our responsibility toward the environment and people who could be directly or indirectly impacted by our business activities. For a sustainable production process at Aurubis, the actors in the entire supply chain have to work responsibly. Likewise, we expect the work of our business partners to be guided by sustainability considerations accordingly.**

*We expect our business partners to follow not only local laws, but also UN sanctions and trade restrictions, as well as UN conventions related to human rights, environmental protection, and safety.*

Employees and supervisors in the purchasing and sales departments for primary and secondary raw materials follow the processes, systems, and regulations in place at Aurubis. Among other reasons, we do this to fulfill our due diligence obligation in the supply chain. We implement the principles of the OECD Guidelines for Multinational Enterprises, particularly the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including Annex II, and require our suppliers to follow them as well.

When sourcing goods, services, and operating supplies that are required for our production but that don't go into our sales products, we also select suppliers and service providers in accordance with the established supplier assessment processes, which take environmental protection, occupational safety, and social matters into consideration.

Maintaining a dialogue with our business partners is part of our company policy. We raise awareness, encourage willingness to cooperate for sustainable management, and support our business partners' improvement process.







*We plan facilities carefully, operate them in accordance with their permits, and service them regularly.*

We regularly monitor and service plant facilities. As responsible supervisors, we monitor the employees' related tasks and activities, and together we ensure proper operation and avoid accidents and incidents.

If we detect a defect or malfunctioning of a facility, we report this immediately to production management. We follow the alarm and emergency plans and operating instructions in the event of incidents that could have major repercussions.

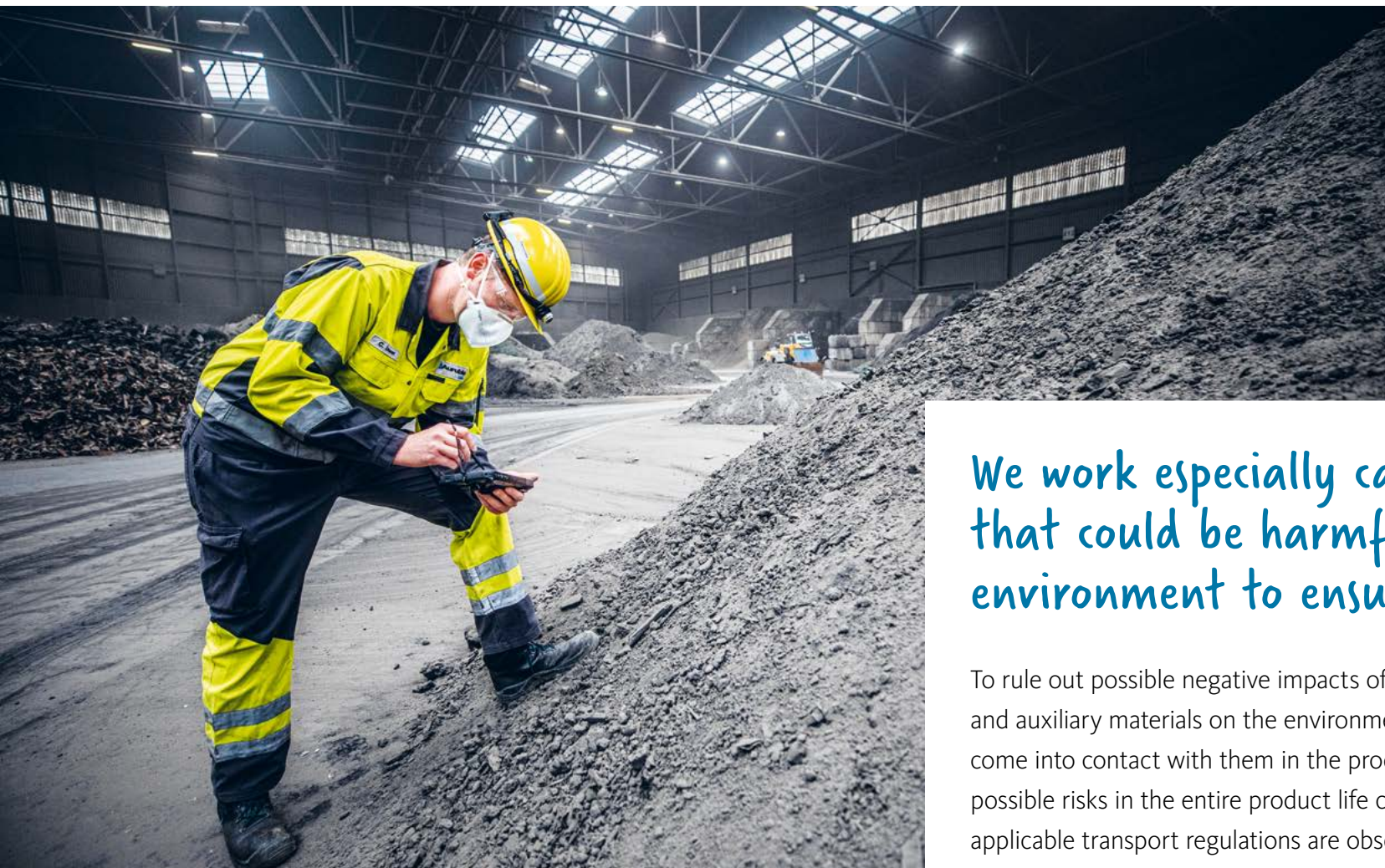
## SAFETY

# Plant and product safety

**With modern, efficient production processes, continuous improvement, and close communication with our business partners, we ensure that our products meet high requirements. This includes compliance with environmental and social standards over the entire life cycle of our products in order to rule out, to a great extent, any impacts on the environment and people who come into contact with the products.**







## We work especially carefully with materials that could be harmful to health or the environment to ensure safety.

To rule out possible negative impacts of our starting, intermediate, and final products and auxiliary materials on the environment or the health and safety of people who come into contact with them in the production process or as customers, we take the possible risks in the entire product life cycle into consideration. We ensure that the applicable transport regulations are observed.

We include the necessary safety data and warning notices for each product. We appropriately inform our customers about the properties of our products and essential safety measures and advise them on questions regarding product recycling or disposal.

If we identify risks or consider them possible when handling a material, we report this at once to production management, as well as to those responsible for environmental protection and quality assurance.







## SAFETY

# Data protection and information security

**In light of the increasing use of digital technologies in business, protecting personal data has high priority at Aurubis. It is important to prevent data misuse.**

*We gather, process, and utilize data from employees, business partners, and other relevant individuals for purposes related to business or labor law only to the extent legally permitted.*

In doing so, we strictly observe the following data protection principles by:

- » collecting and processing personal data fairly and lawfully,
- » only processing it within the scope of previously defined purposes,
- » only collecting it to the extent necessary for a legally compliant purpose,
- » deleting it after retention periods have expired,
- » saving it correctly, completely, and up to date,
- » treating it confidentially and securing it through appropriate organizational and technical measures against unauthorized access, loss, modification, etc., and
- » informing the data subjects about the handling of their data.





*We protect our business data as well as our employees' and business partners' data from unauthorized access by third parties.*

We protect our IT equipment with state-of-the-art technology. Strict access management and password management are a matter of course for us. We secure our hardware and software with complex passwords that we change regularly, as well as two-factor authentication. Software programs are only installed by employees who are specially authorized for this purpose.

With regard to our IT and information security, we regularly carry out risk analyses and safety checks, such as penetration tests. We react to unauthorized data leaks or third-party access in accordance with our established reaction plans.







**SAFETY**

# Protecting business secrets and intellectual property

**Confidential information, such as business secrets, and our intellectual property, such as patents and secret expertise, are important company assets.**

*We keep confidential information (e.g., certain production processes or commercial data) secret and protect our intellectual property from unauthorized distribution and unauthorized third-party access with the appropriate confidentiality measures.*

We protect confidential information in discussions and plant tours with business partners and competitors as well. This also applies when working remotely, on business trips (e.g., in trains and planes), or in other public spaces.

We respect the confidential information and intellectual property rights of third parties, too, and only use them when we have permission to do so.

If an invitation to tender is issued for services or products in the procurement process, we do not pass on information on a tenderer or their offer to another tenderer.

Taking photos or videos is generally prohibited in the plant. Exceptions may be made for certain business purposes, however. If necessary, we obtain permission from the department internally responsible for this at the sites.

We secure highly sensitive correspondence appropriately. We ensure that documents aren't sent or forwarded to the wrong recipients.

Letters and packages marked "Personal" or "Confidential" may only be opened by the addressee.

We are obligated to maintain confidentiality even after our employment has ended.



**BUSINESS INTEGRITY**

# Fair competition

**Free competition creates growth and jobs and ensures that customers receive good products at appropriate prices.**

*We advocate for fair, functioning competition and follow all of the applicable antitrust and competition laws.*

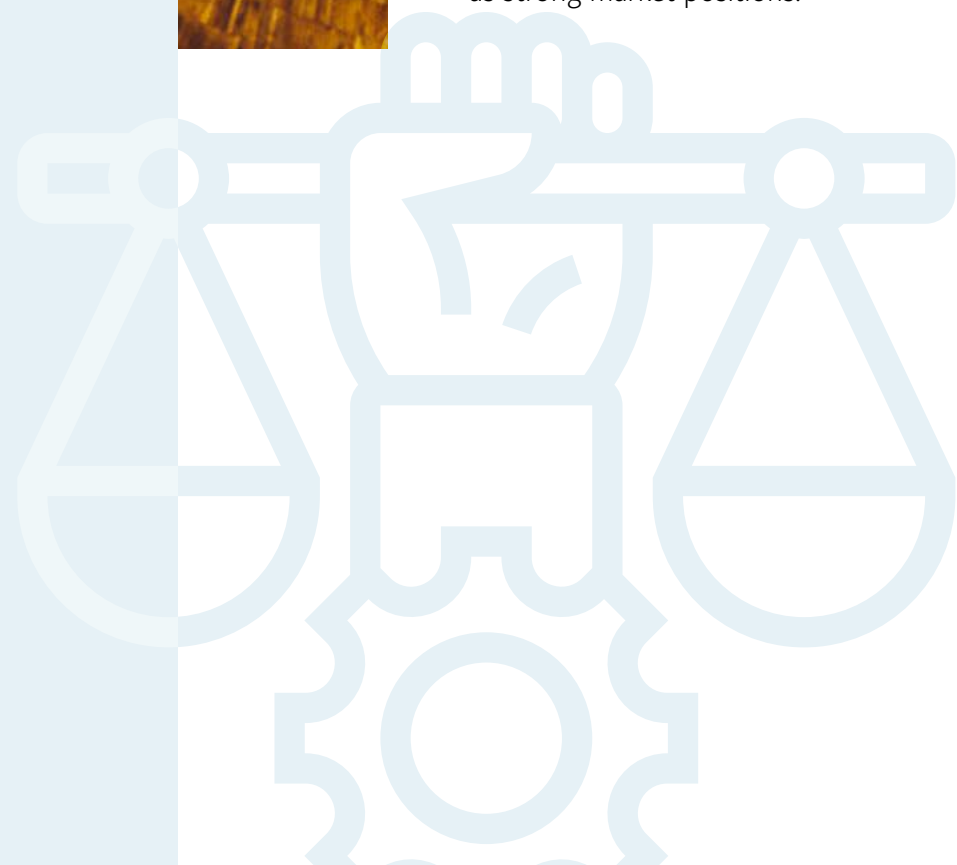
We are aware that violations of these laws can lead to high fines for Aurubis that could endanger the future existence of the company.

As a result, we observe the following rules regarding horizontal and vertical barriers to competition as well as strong market positions.

*Agreements between competitors (referred to as horizontal competitive agreements) that prevent, limit, or distort competition are prohibited.*

These include:

- » pricing agreements
- » allocation of regional markets
- » allocation of customers
- » sales quotas





Agreements between suppliers and customers (referred to as vertical competitive agreements) that have the aim of restricting the freedom to arrange prices and business terms with third parties are also prohibited.

Antitrust law doesn't just prohibit explicit agreements. Coordinated behavior, informal discussions, or informal agreements that could have the effect of restricting competition are also prohibited. Even the mere appearance of such agreements must be avoided.

If we exchange information with competitors, we must ensure that we don't make any statements or receive any information that allows conclusions to be drawn about Aurubis' current or future market behavior. Likewise, we may not give any information about customers and supplier relations, prices and their possible changes, costs and calculations, as well as capacities or planning.

These include:

- » exclusivity clauses with a duration of more than five years (package sales clauses or exclusive delivery clauses)
- » non-competition clauses
- » price fixing



Companies with strong market positions are monitored especially stringently under antitrust law.

Aurubis has a strong market position in some markets. We may not misuse this strong position to the detriment of customers and competitors, for example through exclusivity agreements, package deals, certain discount systems, or delivery refusals.





## BUSINESS INTEGRITY

# Countering corruption and bribery

**Corruption causes not only material damages, but also undermines fair, free competition. Aurubis does not tolerate corruption, bribery, or “facility payments” under any circumstances. This is true for Aurubis’ own employees as well as all business partners.**

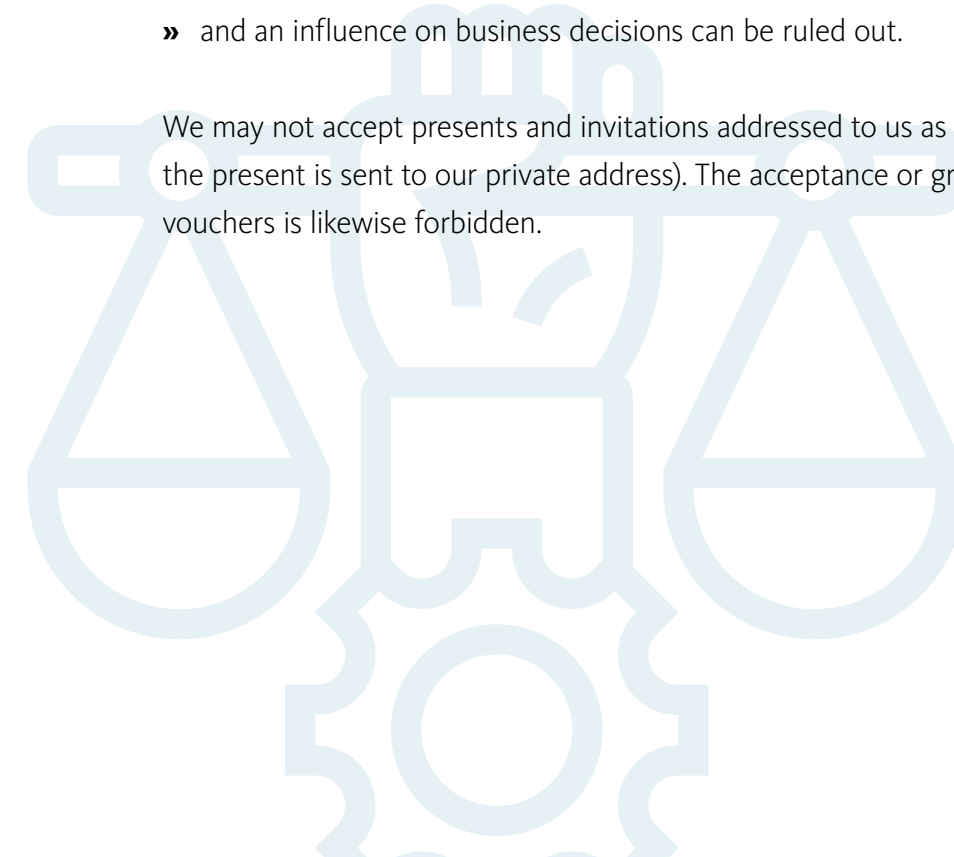
*None of us may demand, accept, offer, or grant any personal gain in connection with our company activities that could in any way give an impression of exercising influence on a business decision.*

This applies in particular to the initiation, placing, or settlement of an order – regardless of whether with a private person, a company, or a governmental authority.

We may only grant or accept presents and invitations if they are

- » common practice,
- » are meant as a token gesture,
- » are of little value,
- » and an influence on business decisions can be ruled out.

We may not accept presents and invitations addressed to us as private individuals (e.g., if the present is sent to our private address). The acceptance or granting of cash presents and vouchers is likewise forbidden.







## We must always inform our supervisor about presents and invitations.

In case of doubt, he or she will contact Corporate Compliance or the individual locally responsible for compliance to ensure an independent and uniform Group assessment.

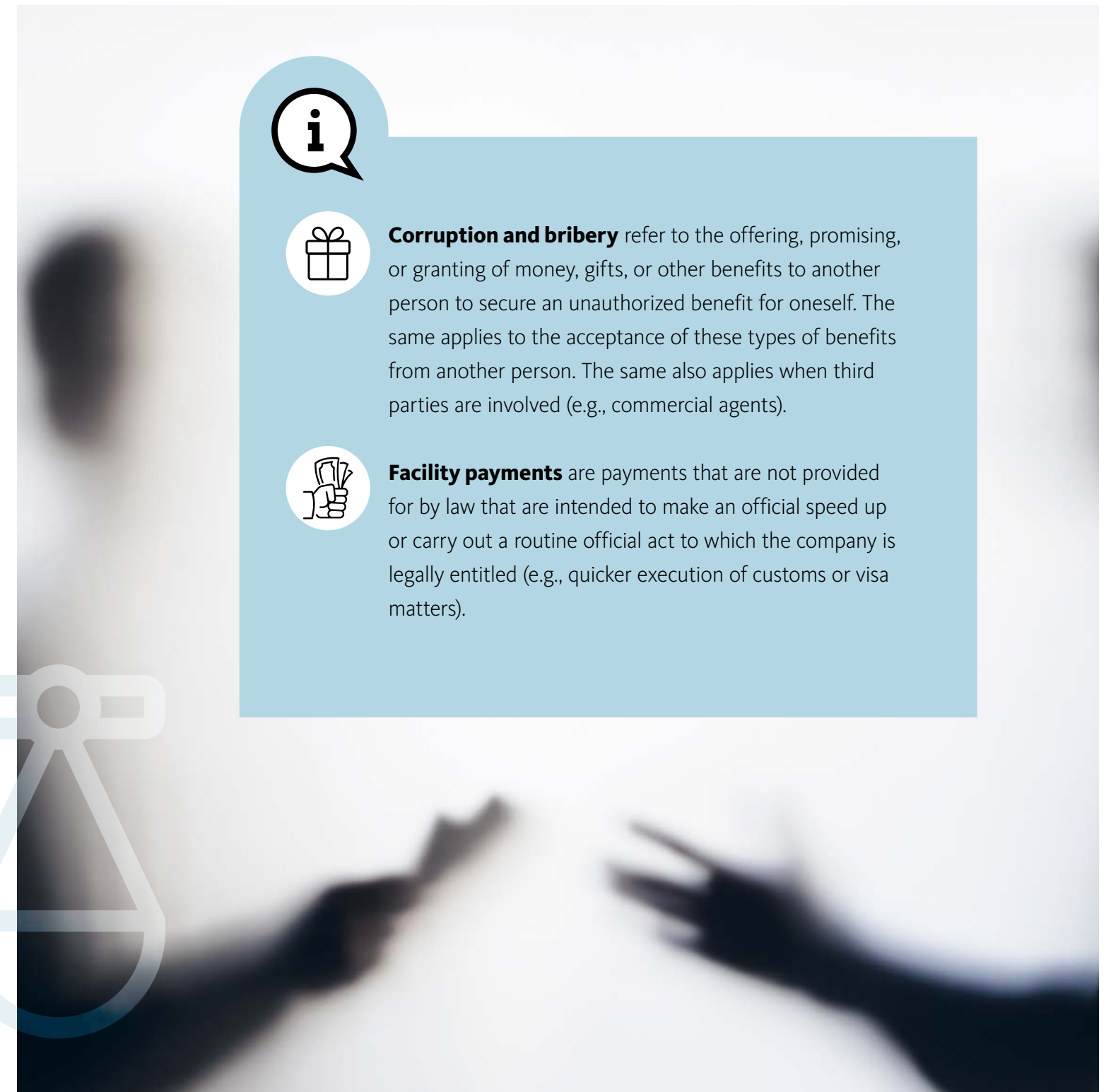
Interactions with state institutions are especially risky. We are not permitted to grant officials any unauthorized benefits.



**Corruption and bribery** refer to the offering, promising, or granting of money, gifts, or other benefits to another person to secure an unauthorized benefit for oneself. The same applies to the acceptance of these types of benefits from another person. The same also applies when third parties are involved (e.g., commercial agents).



**Facility payments** are payments that are not provided for by law that are intended to make an official speed up or carry out a routine official act to which the company is legally entitled (e.g., quicker execution of customs or visa matters).





## BUSINESS INTEGRITY

# Conflicts of interest

**Financial or personal relations with Aurubis business partners, competitors, employees, or applicants can trigger conflicts of interest and influence decisions at work.**

*We distinguish between our private interests and those of the company. When making business decisions, we don't allow ourselves to be guided by personal interests and relationships, but instead act in Aurubis' best interests.*

We promptly disclose possible conflicts of interest to our supervisor. In case of doubt, he or she will contact Corporate Compliance or the individual locally responsible for compliance.

We select our business partners and contractual partners in accordance with objective criteria only, e.g., price, quality, reliability, and product suitability. Our personal relationships or interests may not influence business relations and the awarding of contracts. The same applies to the treatment of employees and applicants.







*If we as Aurubis employees take on additional employment or part-time work or want to pursue a planned, active business venture that could cause a conflict of interest, we have to inform the local HR department.*

As responsible employees, we likewise do this when it comes to any other employment or part-time work. This allows us to rule out any possible concerns that this activity could lead to a conflict of interest or interfere with the obligations of our employment contract with the Aurubis Group.

Aurubis welcomes employees' personal involvement in clubs, political parties, or other social, political, or public institutions as long as these institutions do not contravene the democratic constitutional order and generally acknowledged human rights. However, this personal involvement should not impair the duties covered by the employee's employment contract at Aurubis. Political activity in the company is prohibited.





**BUSINESS INTEGRITY**

# Insider dealing

**Aurubis advocates for fair securities trading and takes all necessary measures to prevent insider trading at Aurubis.**

*Using and/or passing on insider information is illegal and subject to prosecution. We therefore can't use and/or pass on internal knowledge about significant plans and developments at Aurubis for our own personal gain or for the personal gain of anyone else.*

If we have insider information on Aurubis or other companies with whom an important joint transaction is being considered, for example, we may neither buy nor sell our or their securities (including derivatives such as options and futures), and we may not pass this information on to third parties.

If we hear about any insider information, we have to inform Corporate Legal Affairs immediately. As an exchange-listed company, Aurubis is fundamentally required to promptly publish insider information about internal Aurubis matters within the context of an ad hoc release. The information must be kept strictly confidential until this point in time.



Insider trading means the illegal use of insider information about stock companies for stock market transactions. Where Aurubis is concerned, this is generally information that isn't publicly known that could influence the share price if it were to be publicized.

This includes:

- » the planned acquisition of external companies
- » the sale of parts of the company
- » the establishment of joint ventures
- » major investments
- » profit trends
- » other facts affecting the share performance





## BUSINESS INTEGRITY

# Trade, tax, and customs regulations

**As an international company, Aurubis is active worldwide. Following national and international trade rules that regulate the import and export of our raw materials and products is a matter of course for us. The same applies to tax and customs regulations.**

*We observe the relevant import and export regulations and national and international sanctions and embargoes that could relate to our raw materials and products, the countries of origin and destination, or specific contractual partners.*

With systematically generated documents, we ensure that information can't be modified and that constant export control is possible.

We review whether official permits are required for a transaction and obtain them as needed.

We observe the stipulations under tax and customs law, particularly corporate tax, payroll tax, and sales tax regulations, as well as the customs and excise taxes that have to be paid when importing goods. We declare the taxes and customs we have to pay correctly and in good time.





*We make sure that Aurubis isn't misused for money laundering purposes.*

When entering into and processing contracts, we review the contractual partner's business environment, the contractual partner itself, and the purpose of the intended transaction. In suspicious cases, such as those involving cash transactions or payments from third parties, we immediately contact our supervisors, Corporate Compliance, or the individual locally responsible for compliance.

**BUSINESS INTEGRITY**

## **Combating money laundering**

**Preventing the concealment and transfer of assets with illegal origins and preventing the financing of terrorism are part of Aurubis' standard business policy.**



Money laundering refers to the channeling of illegally generated money into the legal financial and economic system.





*We ensure that our accounting and our financial and non-financial reporting are always true, correct, relevant, complete, and punctual.*

We are responsible for our business records and related documents showing all business transactions in their entirety and for reporting the company's assets correctly. We carefully and accurately prepare the records and documents that serve as the foundation for our financial reporting.

Furthermore, we ensure that we clearly, transparently, and thoroughly document our work results, processes, and records to guarantee an accurate representation.

**BUSINESS INTEGRITY**

# Proper accounting and documentation

**The trust of the general public, investors, and business partners in Aurubis' finances is important. As a result, our business figures have to be reliable.**





**BUSINESS INTEGRITY**

## Handling company resources

**We handle company resources carefully and sustainably. Each one of us is obligated to protect Aurubis' resources from theft, damage, and misuse. The same applies to our business partners' property that ends up within our responsibility.**

*We use Aurubis' equipment and work supplies (e.g., machines, devices, goods, raw materials, vehicles, office supplies, documents, files, data storage devices, IT hardware and software) and its workforce for work-related purposes only.*

We safeguard Aurubis property from unauthorized third-party access. For instance, this means that we keep an eye on the tools we're using and keep our desks, cabinets, and offices locked.

Company property is used at the Aurubis sites only; for exceptions, we obtain permission from the relevant internal department. Phones, e-mail, computers, laptops, and the internet are used solely for work-related purposes. Exceptions apply if documented company regulations allow for the private use of company resources.







## OUR ROLE IN THE PUBLIC DOMAIN

# Social engagement

**We have set the goal of contributing to a livable world for current and future generations. In doing so, we focus on areas of action that are linked with Aurubis' key areas of expertise, following our sponsoring principles and the social engagement strategy "together we care."**



*We observe the designated responsibilities for donation and sponsoring decisions and follow the established criteria when selecting projects and partners.*

Our social engagement is primarily linked to donations or sponsoring projects and focuses on the areas of knowledge, environment, and participation. There are additions to these focus areas at the sites depending on regional needs. Requests for support for conferences with specialized topics and lobbying activities don't fall within the scope of social engagement.







When we as employees make a suggestion for a project worth supporting, we pay attention to the sponsorship focus areas and make sure that there are no conflicts of interest.

Only the departments responsible for social engagement at the Group sites accept or decline project requests.

In our decisions, we only consider ethically tenable partners and projects, and we require our partners to be transparent in the use of funds and to quantitatively measure the effectiveness of the projects. By communicating regularly with our project partners, we can adjust measures and plans to current needs.







*Aurubis strives to maintain a cooperative and open relationship with all relevant governmental authorities and public offices.*

All employees who are responsible for submitting information to specific authorities do this correctly, thoroughly, and in good time.

Aurubis' Corporate Communications department or the site-specific communications departments communicate with the media and the general public.

## OUR ROLE IN THE PUBLIC DOMAIN

# Appearing in the public domain

**Open and transparent communication is the foundation for close, constructive interaction with Aurubis' various stakeholders.**





We as employees pass on any questions from the media to the communications departments without giving any personal opinions so that these departments can coordinate an appropriate reaction.

The communication of the employee representatives within the context of their legal duties is not affected by this.

Official statements from Aurubis on social media and on the internet are only released by authorized employees who are identifiable as such.



If we would like to hold presentations or release information (online, print, social media, etc.) connected to our work, we coordinate this with our supervisors and the Corporate Communications department.

When we as employees express personal opinions on Aurubis issues in public or on social media, we explicitly say that we work for Aurubis and that these views are personal opinions.

For example, we can do this by stating, "I am an Aurubis employee and am expressing my personal opinion here." We don't use the Aurubis logo, or any other photos to which Aurubis owns the rights, for private purposes. We treat sensitive information confidentially.





## OUR ROLE IN THE PUBLIC DOMAIN

# Political lobbying

**The appropriate representation of Aurubis' interests toward political and social institutions is an important part of responsible corporate governance.**

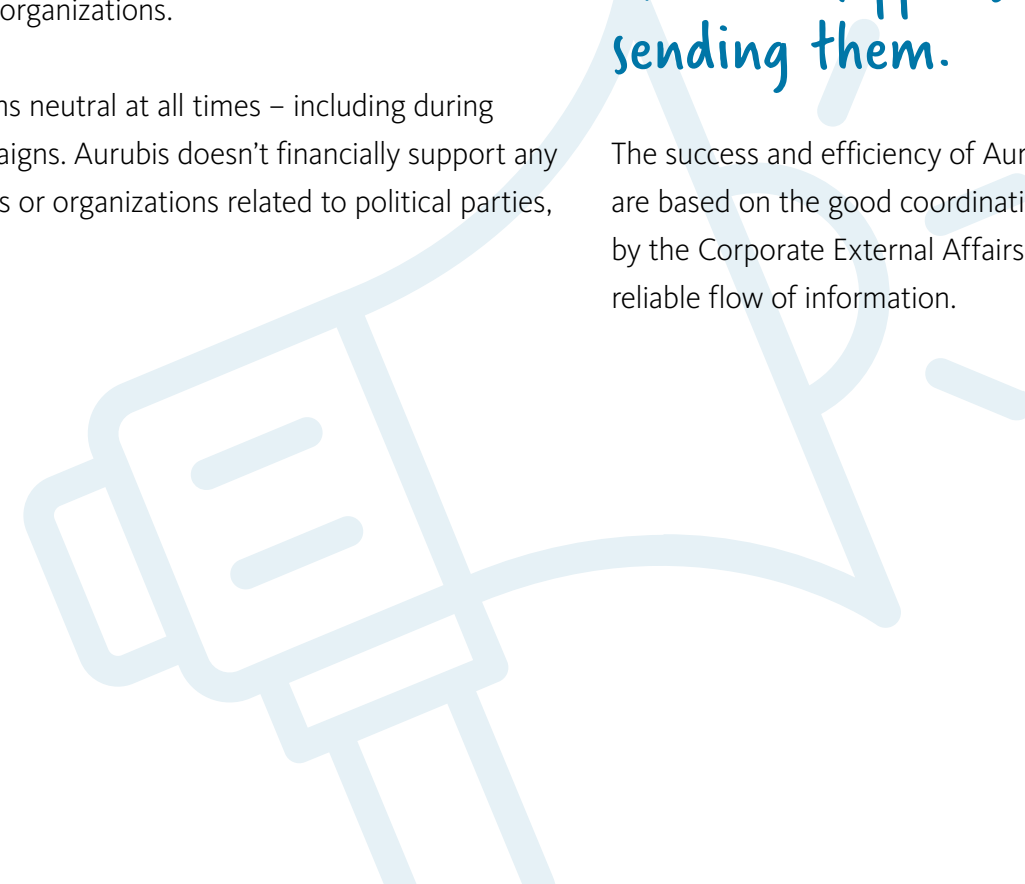
We participate in legislative processes in the policy areas that affect us by communicating with decision-makers from different institutions in the political sphere.

In doing so, Aurubis is a reliable, fact-based, transparent discussion partner to governments, political parties, elected representatives, advocacy groups, and non-governmental organizations.

Aurubis remains neutral at all times – including during election campaigns. Aurubis doesn't financially support any political parties or organizations related to political parties, either.

We arrange any meetings planned within a political context, as well as all official letters and e-mails to governmental institutions, parliamentarians, parliamentary groups, diplomats, and similar recipients, with Corporate External Affairs before sending them.

The success and efficiency of Aurubis' political lobbying are based on the good coordination of all political activities by the Corporate External Affairs department and on a reliable flow of information.





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Andreas Schmidt-Wiethoff, page 17, 18, 19  
Johanna Sjövall, page 18  
Studiovision.be, page 34  
Jente Willems, page 12  
istockphoto, page 1, 6, 7, 10, 12, 13, 14, 16, 24, 25, 26,  
27, 29, 30, 33, 35, 36, 38, 40, 41, 42, 44



