



# LBMA RESPONSIBLE GOLD

## INDEPENDENT REASONABLE ASSURANCE REPORT-

## AURUBIS AG

**Monitoring Period: 2021-10-01 to 2022-09-30 (inclusive)**

**Report No: 8003053042**

**Date: 2022-12-22**

TÜV NORD CERT GmbH  
AM TÜV 1  
D-45307 Essen  
Germany



TÜV NORD Certification Program

P-No.: 8003053042

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Management Representative,  
Aurubis AG  
Hovestr 50  
20539 Hamburg  
Germany

## **Background**

We were engaged by Aurubis AG to provide reasonable assurance on its Refiner's Compliance Report for the period 01-10-2021 to 30-09-2022 (inclusive).

The assurance scope consists of the Refiner's Compliance Report.

## **Responsibilities**

The management of Aurubis AG are responsible for the preparation and presentation of the Refiner's Compliance Report in accordance with the LBMA Responsible Gold Guidance (the Guidance). This responsibility includes establishing appropriate risk management and internal controls from which the reported information is derived. The criteria identified by the management as relevant for demonstrating compliance with the Guidance are the activities described within the Refiner's Compliance Report. Our responsibility is to carry out a reasonable assurance engagement in order to express a conclusion based on the work performed. We conducted our assurance engagement in accordance with International Standard on Assurance Engagements ISAE 3000 Assurance Engagements other than Audits or Reviews of Historical Financial Information issued by the International Auditing and Assurance Standards Board and the guidance set out in the LBMA Responsible Gold Programme - Third Party Audit Guidance for ISAE 3000 Auditors (the Audit Guidance).

This report has been prepared for Aurubis AG for the purpose of assisting the management in determining whether Aurubis AG has complied with the Guidance and for no other purpose. Our assurance report is made solely to Aurubis AG in accordance with the terms of our engagement. We do not accept or assume responsibility to anyone other than Aurubis AG for our work, or for the conclusions we have reached in the assurance report.

## **Inherent limitations**

Non-financial information, such as that included in the Refiner's Compliance Report, is subject to more inherent limitations than financial information, given the more qualitative characteristics of the subject matter and the methods used for determining such information. The methods used by Refiners to comply with the Guidance may differ. It is important to read Aurubis AG's Gold supply chain policy available on Aurubis AG's website <https://www.aurubis.com/en/products/other-metals/gold>

### **Independence and competency statement**

In conducting our engagement, we confirm that we satisfy the criteria for assurance providers as set out in out in the Audit Guidance to carry out the assurance engagement.

### **Conclusion**

In our opinion, Aurubis AG's Refiner's Compliance Report for the period 01-10-2021 to 30-09-2022 (inclusive), in all material respects, describes fairly the activities undertaken during the year to demonstrate compliance, and management's overall conclusion contained therein, is in accordance with the requirements of the LBMA Responsible Gold Guidance.

**Name:** Susanne Günzerodt

Tahsin Choudhury

**Role:** Lead Assessor

ISAE 3000 Assessor

**Signatures:** 



**Assurance firm:** TÜV NORD CERT GmbH

**Date:** 2022-12-22

Essen, Germany.

## REFINER COMPLIANCE REPORT GOLD

ASSESSMENT INFORMATION	
Refiner Name:	Aurubis AG
Refiner Location:	Hovestr. 50, 20539 Hamburg
Refiner Contact Person:	
Name, Title:	Mr. Dennis Maack
Email:	<a href="mailto:d.maack@aurubis.com">d.maack@aurubis.com</a>
Phone:	040 78832301
Assessment Period	01.10.2021 – 30.09.2022
Lead auditor and audit team members	Susanne Günzerodt (LA) Dr. Tahsin Choudhury Dr. Hanspeter Tomschi
Date of this report	20.12.22

### Aurubis evaluation

Step 1: Establish strong company management systems
<p><b>Compliance statement with requirement:</b></p> <p>We have fully complied with step 1 and established a strong management system.</p>
<p><b>Has the Refiner adopted a company policy regarding due diligence for supply chains of gold?</b></p> <p>At the beginning of the reporting year, a gold supply management policy was in place and put into effect, which is in consistence with the model set out in the Annex II of the OECD Due Diligence Guidance. The gold supply management policy covers all human rights abuses mentioned in Annex II and the applicable LBMA Gold Guidance. Together with our internal business partner screening policy this sets out our responsibility for conducting risk-based due diligence, screening and monitoring of transactions and governance structures.</p>
<p><b>Has the Refiner set up an internal management structure to support supply chain due diligence?</b></p> <p>The internal management system based on above two policies is set up to define the governance, roles and responsibilities, internal audit, communication and senior management review. The silver and gold supply manager has been assigned to manage the process and has a direct line of reporting to the senior management.</p> <p>The silver and gold supply manager i.a.</p> <ul style="list-style-type: none"> <li>continually monitors the gold and silver supply chain due diligence process and ensures that the risks associated with the purchase of gold- and silver-bearing materials are addressed;</li> <li>works toward the revision of this policy as required;</li> <li>is responsible for the training of the employees who are involved with the purchase of gold- and silver-bearing materials and ensures that they are familiar with the risks associated with the</li> </ul>



purchase of gold- and silver-bearing materials and the principles laid down in this policy and act in accordance with the policy;

- adequately (at least four times a year) informs the senior management
- is the point of contact for feedback and suggestions for improving the gold and silver supply management system from employees who are involved with the procurement or processing of gold- or silver-bearing materials at Aurubis;
- ensures that the employees who are involved with the procurement of gold- or silver-bearing materials at Aurubis communicate the requirements laid down in this policy to suppliers of risky materials, and
- ensures that the employees who are involved with the procurement of gold- or silver-bearing materials at Aurubis exchange views regularly with suppliers of risky materials in regard to the risks of the gold and silver supply chain.

**Has the Refiner established a strong internal system of due diligence, controls and transparency over gold supply chain, including traceability and identification of other supply chain actors?**

Each delivery is registered in SAP system and all relevant information like shipping documents, weight receipts, assays or settlements are centrally stored. All relevant documents are digitized and stored safely. The release for treatment of the lot is done only when all information is available.

**Has the Refiner strengthened company engagement with gold supplying counterparties, and where possible, assisted gold supplying counterparties in building due diligence capabilities?**

We have implemented a business partner code of conduct that contains the requirements for our supply chain in alignment with the OECD guidelines. Where necessary and appropriate we engage in discussions with our supply chain to discuss and obtain more detailed information and discuss required changes.

**Has the Refiner established a company-wide communication mechanism to promote broad-based employee participation and risk identification to management?**

The Refiner has developed a mechanism allowing employees and external stakeholder to voice concerns over the gold supply chain or a newly identified risk. All commercial employees can raise concerns to the gold and silver supply manager and/or the Chief Compliance Officer. A groupwide and public whistleblower-hotline has been established, which is reviewed by corporate compliance.

The whistleblower-hotline can be contacted around the clock by telephone, web form, e-mail or fax to report indications of possible concerns in the gold and silver supply chain. The whistleblower-hotline is available in 14 different languages.

**Step 2: Identify and assess risks in the supply chain**

**Compliance statement with requirement:**

We have fully complied with step 2 and have identified and assessed risks in the supply chain.

**Does the Refiner assess risks in light of the standards of their due diligence system?**

To fulfill our due diligence obligation with regard to our gold supply chain, we have implemented a Business Partner Screening system based on the principles of the OECD. Supply chain due diligence comprising all measures required by the LBMA Responsible Gold Guidance is performed before entering into a business relationship with any gold supplying counterpart.

The Commercial department is responsible for the screening. The Compliance and Sustainability departments have supporting functions. In the risk analysis, we consider both regional risks and those related to the business partners' business activities. The focus of the process is on the topics

of anti-corruption, respect for human rights, occupational safety, and environmental and climate protection, as well as OECD obligations and third-party certification. The results of a media search are also included in the screening.

Our raw material suppliers are subject to review. The result includes a profile that, in the case of increased risk, leads to additional research. Based on the subsequent assessment, management makes decisions about contracts and possible related restrictions. For existing business partnerships, we repeat the analysis regularly depending on the development of the individual risk and the dialogue that takes place.

In the event of substantiated knowledge of identified risks, steps will be taken to improve the sustainability performance of our partners. These measures range from a conversation about the circumstances, a statement by the supplier about the situation on site, agreement of a development roadmap in the event of actual negative incidents, and a local stakeholder dialogue to an external assessment by a third party. The steps that may be taken can also include not entering into or terminating a business relationship if the preceding measures are not effective.

We performed enhanced due diligence for higher-risk categories, which includes (if applicable) those where gold originates from or transits via a conflict-affected or human rights abuse high-risk area. In addition, we conduct appropriate scrutiny and monitoring of transactions undertaken through the course of the relationship.

**Does the Refiner report risk assessment to the designated manager?**

Our silver and gold supply manager provides reporting to the Senior VP Commercial and if necessary to our CEO, representing the senior management team on a regular basis. The senior management must approve all new suppliers classified as high risk. Senior management retains the ultimate control and responsibility for the decision to start or continue a business relationship.

**Step 3: Design and implement a management system to respond to identified risks**

**Compliance statement with requirement:**

We have fully complied with step 3 and designed and implemented a management system to respond to identified risks.

**Has the Refiner devised a strategy for risk management of an identified risk by either (i) mitigation of the risk while continuing to trade, (ii) mitigation of the risk while suspending trade or (iii) disengagement from the risk?**

While the identification of the supply risk for gold the higher identified risk cases were managed either by mitigating the risk while continuing the business relation or termination of the respective business relation respectively not starting the relation for new supplier. These decisions were aligned with the silver and gold supply manager and where necessary escalated to senior management. In case business relation is terminated the business partner is banned in SAP and the IT tool for business partner screening.

**Where a management strategy of risk mitigation is undertaken, it should include measureable steps to be taken and achieved, monitoring of performance, periodic reassessment of risk and regular reporting to designated senior management.**

The business partner screening tool requires for higher risk counterparts conditions to be fulfilled resulting in a reassessment. The individual measures are defined and logged in the system, where required agreed with senior management.

**Step 4: Arrange for an independent third-party audit of the supply chain due diligence**

**Compliance statement with requirement:**



We have fully complied with step 4 and arranged for an independent third-party audit of the supply chain due diligence.

Aurubis engaged the services of TÜV Nord to audit the gold supply risk according to LBMA requirements and the report is publicly available. The audit for the current fiscal year is planned for November/December 2023.

#### **Step 5: Report on supply chain due diligence**

##### **Compliance statement with requirement:**

We have fully complied with step 5 and reported on supply chain due diligence.

Further information on our systems, targets and fulfillments with regards to our supply chain can be found in the annual report and specifically the nonfinancial report and on our company website.

### **Aurubis overall conclusion**

#### **Management conclusion**

##### **Is the Refiner in compliance with the requirements of the LBMA Responsible Gold Guidance for the reporting period?**

Yes, in conclusion, Aurubis implemented an effective management systems, procedures, processes and practices to conform to the requirements of the LBMA Responsible Gold Guidance, as above explained for the reporting year ended 30 September 2022.

Aurubis is committed to continuous improvement, and any corrective actions identified will be monitored internally on a regular basis.

**Aurubis AG**



Dennis Maack

Head of Precious Metals & Tin Recycling



Henning Michaelsen

Chief Compliance Officer