

# 2022 Aurubis Modern Slavery and Human Trafficking Statement

This 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 2021/22 (October 1, 2021 - September 30, 2022) to identify and address modern slavery and trafficking risks.

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

Aurubis UK was a precision shearing and metals service center as part of the Aurubis Group. Aurubis sold four sites of the former Aurubis flat rolled products segment to KME SE, Osnabrück (Germany), with effect from July 29, 2022. In consequence, Aurubis UK was transferred to KME SE.

## 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 1 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. Aurubis started construction on the first secondary smelter for multimetal recycling in the US in Augusta, Richmond County in Georgia, in 2022.

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 and Pirdop 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, like Bulgaria, Georgia, and Canada. 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 on the basis of short-term supply contracts, which is customary for the market.

For further details on our products and company structure, please see the [Aurubis 2021/22 Annual Report](#).

## Policies related to slavery and human trafficking

We respect human rights and advocate for their protection. Here we follow the United Nations' Guiding Principles on Business and Human Rights in accordance with the "Protect, Respect and Remedy" framework. 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 fundamentally important to us. The Executive Board and the local managing directors bear responsibility for upholding human rights in our business activities. The [Aurubis Code of Conduct](#) requires that all Aurubis employees fundamentally respect human rights in their daily work and in all their business decisions.

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 OECD Due Diligence Guidelines to promote responsible supply chains.

The [Aurubis Human Rights Commitment](#) summarizes Aurubis' understanding of and key elements of our human rights due diligence obligation. It is aimed at all employees, business partners, and other partners of the Aurubis Group.

[The Aurubis Business Partner Code of Conduct](#) specifically applies to business partners. In our view, our responsibility to uphold human rights extends to the supply chain. In addition, we include a clause in our – usually long-term – supply contracts in which we state that we expect our suppliers of primary raw materials 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. This clause is a component of 81 % of our supply contracts for primary raw materials.

Our [Responsible Sourcing Policy](#) and corporate policy for processing conflict-free precious metal raw materials establish responsibilities and processes within the Group. The new Responsible Sourcing Policy entered

into force on October 1, 2022. The purpose of this policy is to define the responsibilities and procedures in the Group regarding supply chain due diligence.

We call on all employees to report justified suspicion of discrimination or other human rights violations via our Compliance Portal, the [whistleblower hotline](#). [We expect our business partners to do the same. Every report is investigated.](#) We expect our business partners to do the same. Every report is investigated.

## Due diligence processes, risk assessment and management

Our due diligence in selecting suppliers is supported by our Business Partner Screening system that is based on OECD guidelines and that applies to suppliers of both primary materials and secondary materials. In the 2021/22 fiscal year, all procurement processes, including those for conflict minerals, were revised with a particular focus on supply chain due diligence. The new system is scheduled for step-by-step, Group-wide rollout from the start of fiscal year 2022/23.

The production units are responsible for conducting screenings and have commissioned the Commercial and Procurement division with execution. The Compliance and Sustainability divisions are also involved. In our risk analysis, we consider both regional risks and the risks actually associated with the business activities of our business partners. The central issues here include anti-corruption, upholding human rights, including prohibitions on modern slavery and human trafficking, 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. In the event of substantiated awareness of identified risks, steps are taken to improve the sustainability performance of the partner in question. Possible approaches include engaging in conversation about the circumstances, a statement by the supplier about the situation on the ground, the drafting of an improvement plan in the event of actual negative incidents, local stakeholder dialogue, and an external assessment by a third party. Steps may also include deciding not to enter into or terminating a business relationship if the preceding measures prove ineffective.

## Effective action taken to address modern slavery

For fiscal year 2021/22, we are not aware of any cases of forced labor, modern slavery, or human trafficking related to our operations, business relationships, or supply chains. No cases or complaints were reported through the whistleblower hotline.

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



Roland Harings  
Executive Board Chairman

Aurubis AG

Hovestrasse 50  
20539 Hamburg, Germany  
Phone +49 40 7883-0  
[Responsibility@aurubis.com](mailto:Responsibility@aurubis.com)