

Reporting and investigation procedure for the whistleblower hotline and complaints procedure

1. Definitions

Reports can be made about the following:

- Conduct that constitutes a criminal offence directed against the company's interests (particular fraud, corruption, violations of anti-trust law, misconduct regarding accounting regulations);
- Human rights or environment-related risks, as well as violations of human rights or environmental obligations that have arisen as a result of Aurubis' economic activities in its own business sector or with direct and indirect suppliers;
- Conduct that violates anti-discrimination laws;
- Other conduct that violates the Aurubis Code of Conduct for employees or the Business Partner Code of Conduct.

2. Complaint channels

2.1 Whistleblower-Hotline

Employees, business partners, and other third parties can confidentially and anonymously report information regarding the risks and violations detailed in section 1 through the whistleblowing portal (whistleblower hotline) at

<https://www.aurubis.com/en/about-aurubis/corporate-governance/compliance>.

Whistleblowers can contact the whistleblower hotline ("OSR lawyers") 24/7:

- electronically through an online whistleblowing portal (the entry form is available in 14 languages - including English and Spanish),
- by e-mail or
- by telephone.

The specialized attorneys receive the tip and are available for questions.

The use of the whistleblower hotline is free of charge.

2.2 Content of the report

To enable Aurubis to investigate the reported incident or risk properly and effectively, the report should be based on facts and answer questions such as:

- What happened where and when?
- Who was involved?
- Can a repeat of the incident be expected? If so, when and where?
- Who else could have knowledge of the incident or access to the information about it?

- Are there any documents related to or evidence of the incident described?
- Is there any additional information that could possibly be relevant and helpful?

3. Protecting the whistleblower's identity

The OSR Law Office mentioned in section 2 can be reached through the whistleblower hotline and protect the whistleblower's identity under the attorney confidentiality guaranteed by law. The whistleblower's identity is only disclosed to Aurubis on the whistleblower's express request and with their express consent. Otherwise, the whistleblower's identity, if it was disclosed to the attorney, is not disclosed to Aurubis under any circumstances.

Following the report, the attorneys from the OSR Law Office transmit the tip in their own words and in writing to the Aurubis contact. This ensures the absolute anonymity of the whistleblower since when submitting a tip, an OSR attorney ensures that no information is included that could indicate the whistleblower's identity. Even if the OSR Law Office attorneys know the whistleblower's identity, it is subject to attorney confidentiality and cannot be disclosed.

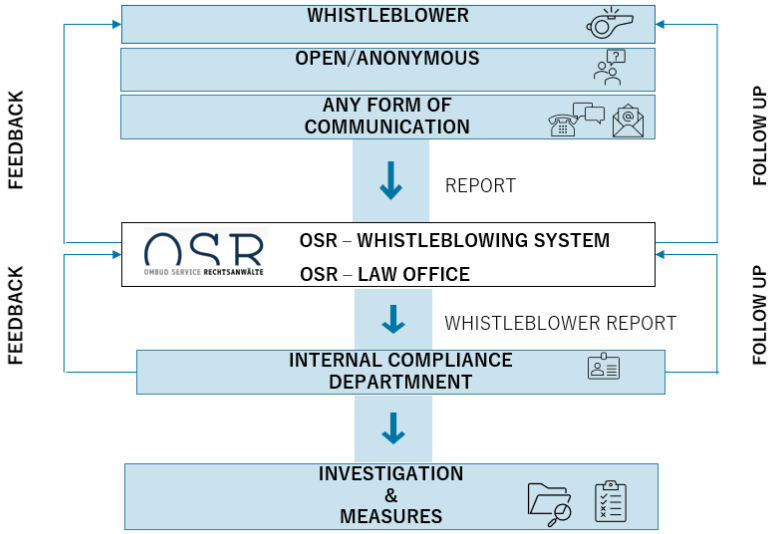
The whistleblower can freely decide what information the OSR attorneys pass on to the Aurubis Compliance Department. The facts of a report can only be discussed with the Compliance Department if contact data is permitted to be passed on to the Compliance Department.

The electronic transfer of a tip to the OSR Law Office is end-to-end encrypted.

Whistleblowers are guaranteed protection from disadvantages or punishment resulting from the reporting of risks and violations. Any person who in good conscience reports a risk or a violation in accordance with this policy can rest assured that Aurubis will neither instigate nor tolerate any retaliation against them.

Aurubis is only interested in the risks and violations reported, and not in the identity of the whistleblower. The sole objective is to clarify grievances.

4. Reporting and investigation procedure



Following the report, the OSR Law Office sends confirmation of the receipt of the report to the whistleblower within **seven days** and submits the report in its own words and in writing to the Aurubis contact. Compliance Department employees are specially trained, impartial with regard to the reporting process and subsequent investigations, independent, not bound by instructions, and sworn to secrecy. All data protection law requirements are upheld. Investigations are conducted objectively and without considering the person, while safeguarding the legitimate interests of the persons involved.

If the whistleblower has expressly waived their anonymity vis-à-vis the OSR lawyers or has provided the OSR attorneys with communication channels (see section 3), the Compliance Department will discuss the facts with whistleblower. The contact details will only be passed on to the Compliance Department, which is sworn to secrecy, for the purpose of discussing the facts.

If, once an investigation is complete, the Compliance Department determines that violations pursuant to section 1 have occurred, appropriate countermeasures are taken. In the event of conduct by company business units and suppliers that violates human rights or environmental obligations, or if corresponding risks are identified, preventive and remedial measures will be developed, implemented, and followed up on, with the involvement of the whistleblower if necessary.

The investigation and its results are documented in accordance with legal requirements. Appropriate measures are taken to ensure the confidentiality of the whistleblower’s identity.

Three months after the report is submitted at the latest, the whistleblower receives a response from the OSR Law Office.