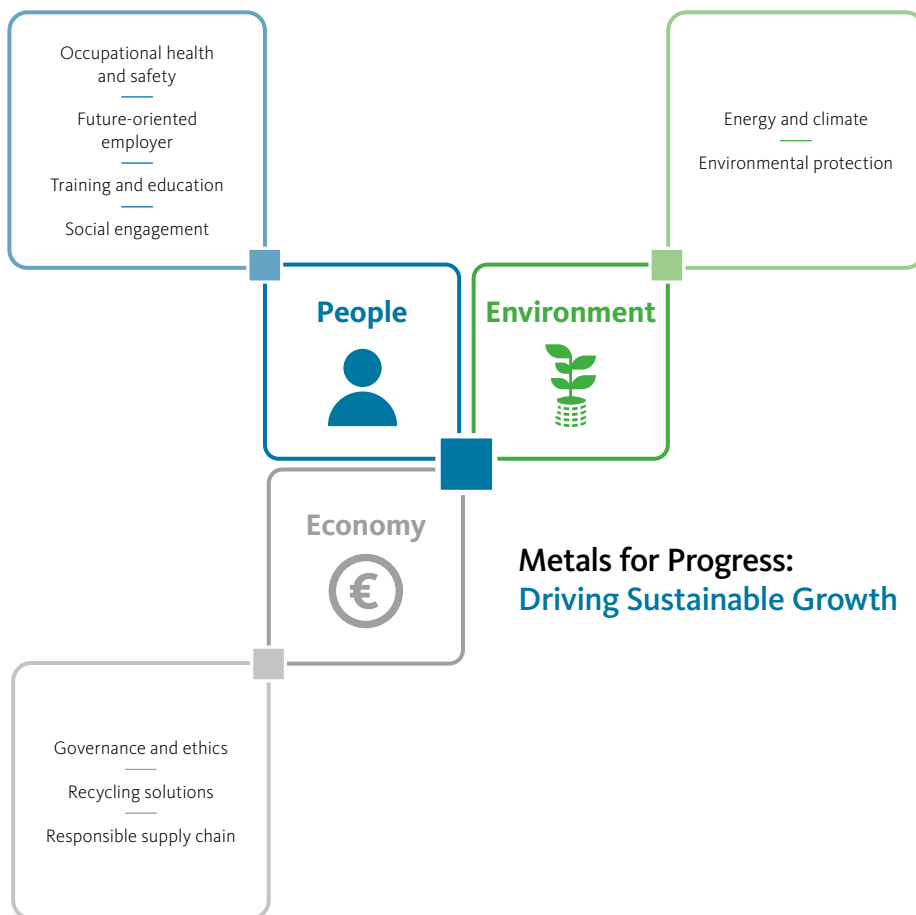


# Non-Financial Report

## Sustainability

Aurubis intends to further expand its role as a leading company in sustainability with its 2030 sustainability targets.



## Introduction

It is important to us to treat employees, suppliers, customers and neighbors with respect, whether in direct business operations or in the areas around our plants. The same applies to the environment, as we are aware of the limits of our planet. So sustainability is a significant part of our conduct in the Aurubis Group, enshrined in our company strategy, and therefore key to our business activities. We follow our company mission to responsibly transform raw materials into metals for an innovative and sustainable world.

With this Non-Financial Report (NFR), Aurubis fulfills its obligation to disclose non-financial information for fiscal year 2022/23 pursuant to Sections 315b and 315c in conjunction with Sections 289b to 289e of the German Commercial Code (HGB). We use the universal standards of the Global Reporting Initiative (GRI) as a guide [Q Glossary, page 273](#).

The NFR also contains information in accordance with the reporting requirements of the EU Taxonomy, Regulation (EU) 2020/852 [Q EU Taxonomy: Glossary, page 272](#).

We describe the main external factors that influence business development in the [Q Risk and Opportunity Report of the Combined Management Report, page 168](#). We detail the risks related to non-financial aspects beyond the company boundaries there as well. Non-financial risks were assessed in accordance with Section 289c (3) of the German Commercial Code (HGB). No non-financial risks were identified in the process that were very likely to cause a serious negative impact on employee and environmental matters, on respect for human rights, on the prevention of corruption and bribery, or on social matters.

## Aurubis sustainability targets

Our corporate strategy, “Metals for Progress: Driving Sustainable Growth,” was updated and adopted in fiscal year 2020/21. This strategy helps us secure and strengthen our core business, pursue growth options, and expand our industry-wide leadership position with respect to sustainability.

This further underlines our aspiration to integrate sustainability into all areas and activities of the company even more thoroughly, thus making it a driver for growth and success. The subsequent development and implementation of the Aurubis Management System (AMS) will assist Aurubis in successfully realizing its company strategy. The Sustainability division is part of the AMS organization and active on strategic committees.

Our “Expanding industry leadership in sustainability” strategy includes the focus areas People, Environment and Economy, which encompass nine sustainability action areas. Each action area has clearly defined targets to be reached by 2030. The previous Sustainability Strategy with its 2018–2023 targets was assimilated as a milestone into the Group strategy mapped out until 2030 for the [Q Aurubis 2030 sustainability targets, page 64](#). In the 2021/22 fiscal year, the Executive Board and the Supervisory Board validated and adopted the updated strategy including the sustainability targets. The Sustainability division continued to advance the implementation of the sustainability targets and the distribution of the targets to functions and sites, along with additional steps towards realizing the targets. The 2030 sustainability targets and the progress of the milestones for 2022/23 are featured at the beginning of each chapter in this report. The implementation status of the 2030 sustainability targets is detailed in the chapters as well. In the year under review, we adjusted our goals for the 2030 sustainability targets in the “Responsible supply chain” action area. This is discussed in detail in [Q Responsible supply chain, page 99](#).

**Aurubis' 2030 sustainability targets**

| Action area                           | Ambition   | 2030 targets   | 2022/23 milestones   |
|---------------------------------------|--|--|--|
| <b>€ Economy</b>                      |  |  |  |
| <b>Governance and ethics</b>          | We uphold the principles of responsible corporate governance.  |  |  |
| <b>Recycling solutions</b>            | We offer comprehensive value chain solutions for the circular economy.   | <b>50%</b> average recycled content in copper cathodes   |  |
| <b>Responsible supply chain</b>       | We minimize negative impacts on people and the environment in our supply chains.   | The improvement plan implemented considerably reduced the risk with all suppliers assessed as high risk.   | <ul style="list-style-type: none"> <li>» Human rights, environmental protection, and safety clauses in 100% of long-term contracts for primary raw materials</li> <li>» Continued rollout of the Aurubis Business Partner Screening</li> <li>» Copper Mark certification of four sites</li> </ul>          |
| <b>🌱 Environment</b>                  |  |  |  |
| <b>Energy and climate</b>             | We will be carbon-neutral well before 2050.  | <p><b>-50%</b> absolute Scope 1 and Scope 2 emissions (reference year 2018)</p> <p><b>-24%</b> Scope 3 emissions per ton of copper cathodes<sup>1</sup> (reference year 2018)</p>  | <ul style="list-style-type: none"> <li>» ISO 50001 at all production sites</li> </ul>  |
| <b>Environmental protection</b>       | We produce with the smallest environmental footprint in our sector.  | <p><b>-15%</b> specific dust emissions in g/t of multimetal copper equivalent (reference year 2018)</p> <p><b>-25%</b> specific metal emissions to water in g/t of multimetal copper equivalent (reference year 2018)</p>  | <ul style="list-style-type: none"> <li>» ISO 14001 at all production sites</li> <li>» Reduction of specific metal emissions to water by 50% in g/t of copper (Cu) output (reference year 2012)</li> <li>» Reduction of specific dust emissions by 15% in g/t of Cu output (reference year 2012)</li> </ul> |
| <b>👤 People</b>                       |  |  |  |
| <b>Occupational health and safety</b> | We prevent work-related accidents, injuries, and illnesses (Vision Zero).  | LTIFR <b>≤1.0</b>  | <ul style="list-style-type: none"> <li>» ISO 45001 certifications at all production sites</li> </ul>   |
| <b>Future-oriented employer</b>       | We create a work environment for close collaboration and promote diversity and commitment. We passionately work for the progress of the company and society. | <p><b>100%</b> of the relevant employees receive unconscious bias training</p> <p><b>&gt;40%</b><sup>2</sup> of employees take part in job rotation and job shadowing, while diversity is fostered at the same time</p> <p>At least <b>75%</b><sup>2</sup> of the employees surveyed participate in pulse checks and feedback measures</p> | <ul style="list-style-type: none"> <li>» Development of a diversity section framework</li> </ul>   |
| <b>Training and education</b>         | We provide high-quality vocational training and invest in forward-looking qualifications for employees.  | <b>100%</b> fulfillment of the continuing education allotment in hours (continuing education allotment: 18 hours per year for each employee)   | <ul style="list-style-type: none"> <li>» 18 training hours per employee per year on average</li> </ul>   |
| <b>Social engagement</b>              | Locally and internationally, we are a reliable partner that is making a lasting contribution to a livable environment.                                       | <p><b>90%</b> long-term partners (percentage of total budget)</p> <p><b>0.8%</b> of operating EBT (five-year average) as annual budget for social engagement, and at least <b>€ 2 million</b></p>  | <ul style="list-style-type: none"> <li>» Developing an impact monitoring system to evaluate sponsored projects</li> </ul>  |

<sup>1</sup> Refers to copper cathodes from internal production.

<sup>2</sup> Over the period FY 2022/23 to 2029/30.

## Key aspects for Aurubis

When selecting the aspects for the NFR, we were guided by both the company's main sustainability action areas and the non-financial topics that are required for understanding business development, the business result, the company's position, and the impacts of our activities on these aspects.

To identify the relevant report content, we updated our materiality analysis [Q Glossary, page 273](#) in the reporting year with the assistance of internal and external experts.

We identified five new material topics in the materiality analysis: "IT security"; "Work and leadership culture"; "Circular economy"; "Remuneration policies"; and "Local communities". We also changed the classification of three topics to improve differentiation: "Decarbonization" no longer falls under "Energy use and CO<sub>2</sub> emissions" and is now a separate topic that includes "Renewable energies". "Human rights in the supply chain" and "Environmental protection in the supply chain" were also made separate material topics this year.

The materiality analysis also revealed that three topics are no longer considered material: "Product safety"; "Work in associations and political lobbying"; and "Diversity and equal opportunity". As in previous years, "Social engagement" also fell below the materiality level. Since "Social engagement" and "Diversity and equal opportunity" are both part of our company strategy, we have included them in this NFR. We also report on "Work in associations and political lobbying" since we consider it important to transparently disclose our activities in this area.

The Executive Board approved the results.

In the NFR, the topics identified as material in this process have been assigned to the respective sustainability action areas, which are each detailed in individual chapters in the report. Topics with overlapping content and the same management approach are summarized in these sections [Q Overview material topics in NFR, page 66](#).

<sup>1</sup> We report comprehensively on product safety in the Sustainability Report and on our homepage.

## Overview of material topics in NFR

| Topics pursuant to the German Commercial Code | Material topic   | Sustainability action area(s)                   | Page in NFR |
|---|--|---|-------------|
| Employee-related matters                      | Diversity and equal opportunity <sup>1</sup>             | Future-oriented employer                        | 975         |
|   | Workplace flexibility                                    | Future-oriented employer                        | 975         |
|   | Training and education & human resources development     | Training and education                          | 979         |
|   | Health and occupational safety                           | Occupational health and safety                  | 981         |
|   | Remuneration policies                                    | Future-oriented employer                        | 975         |
|   | Work and leadership culture                              | Future-oriented employer                        | 975         |
| Environmental matters                         | Energy use and efficiency                                | Energy and climate                              | 984         |
|   | Decarbonization  | Energy and climate                              | 984         |
|   | Environmental and climate protection in the supply chain | Responsible supply chain                        | 999         |
|   | Circular economy   | Recycling solutions                             | 992         |
|   | Maintaining air, water and soil quality                  | Environmental protection                        | 990         |
|   | Waste  | Environmental protection                        | 990         |
|   | Water use and withdrawal                                 | Environmental protection                        | 990         |
|   | Handling of feed materials                               | Recycling solutions                             | 992         |
|   | Products for sustainable transformation                  | Recycling solutions                             | 992         |
| Social matters                                | Work in associations and political lobbying <sup>1</sup> | Governance and ethics                           | 995         |
|   | Social engagement <sup>1</sup>                           | Social engagement                               | 996         |
|   | Local communities  | Social engagement                               | 996         |
| Human rights                                  | Human rights and labor and social standards              | Governance and ethics                           | 997         |
|   | Human rights in the supply chain                         | Responsible supply chain                        | 999         |
| Anti-corruption                               | Preventing corruption and anti-competitive behavior      | Governance and ethics, responsible supply chain | 103         |
| Additional material aspects                   | IT Security  |   | 104         |

<sup>1</sup> Not material within the meaning of the German Commercial Code (HGB), but material for Aurubis.

## Sustainability management

As part of the 2020/21 strategy process, the decision was made to realign Aurubis' sustainability organization to acknowledge the Group's sustainability ambitions and the increasing importance of sustainable business practices in legislation and on the market. As part of this realignment, an independent Sustainability division with increased staffing levels was created in January 2022. In this reporting year, additional positions were filled in order to satisfy the growing importance of environmental, social and governance issues (ESG issues, [Q ESG: Glossary, page 272](#)) as well as supply chain management. The head of the Sustainability division reports directly to the CEO, who bears overall responsibility for sustainability in the Aurubis Group.

The Sustainability division serves as the interface for the sustainability-relevant divisions and coordinates all of the related processes within the Group. The Sustainability division is also responsible for continuously reviewing and developing the sustainability targets and working with the divisions and sites on operationally implementing and advancing the measures. Contacts have been appointed at the sites and for the relevant corporate functions for this purpose. The Sustainability division reports current developments to the Supervisory Board (to the Audit Committee). It also undertakes a continuous review based on ESG criteria, and offers technical support for strategic projects, as well as carrying out supplier assessments based on sustainability criteria. The division also coordinates with Corporate Communications in managing sustainability reporting and communication. It is the point of contact for ESG rating agencies and represents Aurubis' interests in sustainability issues.

In recognition of the impact of sustainability on the company's success, the Aurubis Executive Board's variable compensation — in particular the annual bonus — takes various ESG performance criteria<sup>1</sup> [Q Compensation Report in the Corporate Governance Report, page 32](#) into account.

We have ensured the transparency of sustainability achievements in a variety of ways for many years. These include voluntary reporting and participation in sustainability rankings and ratings, such as the Carbon Disclosure Project (CDP, a non-profit organization that advocates for climate reporting, among other things) [Q Glossary, page 272](#) and EcoVadis. We are also rated by established agencies such as MSCI, Sustainalytics and Institutional Shareholder Services Inc. (ISS ESG) [www.aurubis.com/en/responsibility/reporting-kpis-and-esg-ratings](https://www.aurubis.com/en/responsibility/reporting-kpis-and-esg-ratings). Our Sustainability Report is based on the Global Reporting Initiative (GRI) standards and has been released every two years to date. It supplements the NFB. In the years without a Sustainability Report, like this fiscal year, the sustainability KPIs are updated and released separately in consolidated form in a KPI Update. The European Union's new Corporate Sustainability Reporting Directive (CSRD) will apply to Aurubis starting in 2024. We will publish the first sustainability statements (CSRD report) in accordance with these new regulatory requirements for the 2024/25 fiscal year. The Sustainability division coordinates the timely fulfillment of future reporting obligations.

We communicate regularly with our key stakeholders about sustainability-related topics. We believe it is important to maintain an open and transparent dialogue with our employees, with customers, suppliers, policymakers and society, capital market participants, the media, non-governmental organizations, and the scientific community.

<sup>1</sup> These are not the most significant non-financial performance indicators in accordance with Section 289c (3) of the German Commercial Code (HGB).

## Description of the business model and presentation of the Group structure

As an integrated group, Aurubis processes complex metal concentrates, scrap metals, organic and inorganic metal-bearing recycling raw materials, and industrial residues into metals of the highest purity. In the course of our production processes, copper concentrates and recycling materials are converted into copper cathodes. This is the standardized product format that is traded on the international metal exchanges. Copper cathodes are the starting product for manufacturing additional copper products, such as copper wire rod, continuous cast shapes [Q Glossary, page 272](#), rolled products and strip, along with specialty wires and profiles, but they can also be sold directly. In addition to our main metal, copper, our metal portfolio also includes gold, silver, lead, nickel, tin, zinc, minor metals such as tellurium and selenium, and platinum group metals. Sulfuric acid, iron silicate [Q Glossary, page 273](#), and synthetic minerals round off the product portfolio. The company purchases the necessary feed materials globally, as it doesn't own any mines or stakes in mines [Q Business model of the Group, page 124](#).

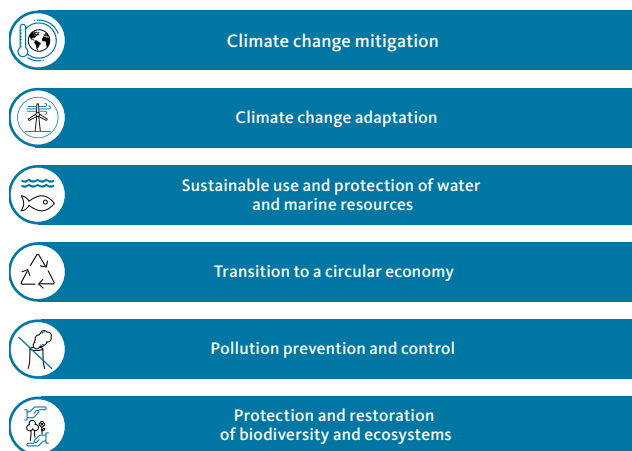
Aurubis AG is the parent company of the Aurubis Group and is based in Hamburg, Germany. For us, sustainability and the related action areas and measures apply to all Group companies. The key indicators mentioned in this report are recorded at Aurubis in the individual departments, companies, and sites, and consolidated at the Group level. In addition to Aurubis AG, the scope of consolidation includes all of the fully consolidated subsidiaries (as at September 30, 2023). When the following report mentions copper production in the context of environmental KPIs, this refers to primary and secondary copper production at the Hamburg, Lünen, Olen, Pirdop, Beerse, and Berango sites. Significant differences between Aurubis AG KPIs and Group KPIs are explained.

## EU Taxonomy

### BACKGROUND AND TARGETS

The European Union is committing to carbon neutrality by 2050. The EU Taxonomy (Regulation [EU] 2020/852 including the related delegated acts adopted as legally binding supplements to the Regulation) is a central element of the action plan for achieving this goal. As a classification system for ecologically sustainable economic activities, it is designed to create transparency for investors and stakeholders, prevent greenwashing, and thus increasingly direct financial flows into sustainable projects.

The EU Taxonomy comprises a total of six environmental objectives:



Technical screening criteria for selected economic activities were published for the first two environmental objectives in June 2021.<sup>1</sup> These economic activities fall under the scope of the EU Taxonomy. They are considered taxonomy eligible. If these activities fulfill the technical screening criteria set out in the EU Taxonomy, they are considered taxonomy aligned.

<sup>1</sup> Regulation (EU) 2021/2178, Annex I.



According to the EU Taxonomy, an economic activity listed in the delegated acts can be classified as ecologically sustainable or taxonomy aligned if the following conditions are cumulatively met:

- » The economic activity substantially contributes to fulfilling an environmental objective (substantial contribution).
- » The economic activity does no significant harm to any of the other environmental objectives (do no significant harm).
- » Minimum standards regarding human rights including workers rights, bribery/corruption, taxes and fair competition are complied with (minimum safeguards).
- » The economic activity fulfills the technical evaluation criteria.

Having focused on criteria for the first two environmental objectives (“Climate change mitigation” and “Climate change adaptation”), the Taxonomy has yet to address many activities at the time of the publication of this report. While the EU included additional taxonomy-eligible economic activities with regard to the four remaining environmental objectives through the delegated act published in June 2023, this cannot yet guarantee overall coverage of economic activities for all reporting entities as it now stands.

Furthermore, the implementation of the EU Taxonomy in companies is accompanied by considerable uncertainties due to the dynamic development and expansion of the EU Taxonomy requirements, along with different interpretations regarding the criteria and level of detail.

#### **FIRST REPORTING ON TAXONOMY ALIGNMENT FOR FISCAL YEAR 2022/23**

Aurubis has been required to apply and report in keeping with the EU Taxonomy reporting obligations since fiscal year 2021/22. In the previous year, the relief options granted were utilized and only taxonomy eligibility was analyzed with data collected and published.

The full contents of the report, including the assessment of taxonomy alignment with regard to the first two environmental goals, is being published for the first time for the 2022/23 fiscal year. Because the fiscal year differs, reporting on the changes to the first two environmental targets or on environmental targets three to six is not yet relevant for the 2022/23 reporting period.

#### **AURUBIS' ECONOMIC ACTIVITIES**

To assess taxonomy eligibility, Aurubis' activities are compared to the economic activities listed in the EU Taxonomy and as such defined as eligible. Aurubis' core activities are:

- » The processing and utilization of complex concentrates and recycling raw materials
- » The production of copper, copper products, and other non-ferrous metals and co-products

Economic activities not covered by the EU Taxonomy are listed as taxonomy non-eligible. These include Aurubis' core business. This applies to the “Climate change mitigation” and “Climate change adaptation” environmental objectives, along with the other four environmental objectives. It is, however, possible that the core activities might be included as taxonomy eligible in the coming years.

Aurubis' product portfolio includes intermediate products for a wide range of solutions for the use of renewable energies, energy-efficient applications, and low-carbon mobility. Even though these intermediate products are not covered by the EU Taxonomy, Aurubis views them as important drivers of the energy transition and essential to achieving Europe's climate targets. Since the EU Taxonomy has thus far focused on economic activities that are not included in the Aurubis product portfolio, only supporting economic activities and not those classified as belonging to the core business are classified as taxonomy eligible.

## TAXONOMY-ELIGIBLE ACTIVITIES AT AURUBIS

An economic activity is taxonomy eligible if technical screening criteria have been described for it per delegated act. Whether the descriptions of the activities set out in the act apply to Aurubis' economic activity is specifically assessed. The EU Taxonomy particularly includes primary economic activities that can make a direct contribution to climate change mitigation. It also defines enabling activities<sup>1</sup> that directly contribute to improving the carbon balance or environmental performance of other activities, as well as transitional activities<sup>2</sup> for which there is not yet a technically feasible and economical low-carbon alternative, but which support the transition to a carbon-neutral world.

Checklist-based interviews were conducted with all fully consolidated subsidiaries to identify Aurubis' taxonomy-eligible activities. For fiscal year 2022/23, seven EU Taxonomy activities from three different sectors were identified for Aurubis' economic activities and as such classified as taxonomy eligible:

| Economic activity   | Description   |
|---|---|
| 4.25 Production of heat/cool using waste heat   | Construction and operation of facilities that produce heat/cool using waste heat  |
| 6.2 Freight rail transport  | Purchase, financing, leasing, rental and operation of freight transport on mainline rail networks as well as short line freight railroads           |
| 6.5 Transport by motorbikes, passenger cars and light commercial vehicles <sup>1</sup>  | Purchase, financing, renting, leasing and operation of vehicles designated as category M1, N1 [...] or L (2- and 3-wheel vehicles and quadricycles) |
| 7.2 Renovation of existing buildings  | Construction and civil engineering works or preparation thereof   |
| 7.3 Installation, maintenance and repair of energy efficiency equipment   | Individual renovation measures consisting in installation, maintenance or repair of energy efficiency equipment                                     |
| 7.4 Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings) | Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)             |
| 7.6 Installation, maintenance and repair of renewable energy technologies   | Installation, maintenance and repair of renewable energy technologies on-site <sup>2</sup>  |

<sup>1</sup> The activity allocation of the vehicles purchased changed compared to the previous year from EU Taxonomy Activity 6.3 Urban and suburban transport, road passenger transport to 6.5 Transport by motorbikes, passenger cars and light commercial vehicles.

<sup>2</sup> The activity allocation of the solar park projects changed compared to the previous year from EU Taxonomy Activity 4.1 Electricity generation using solar photovoltaic technology to 7.6 Installation, maintenance and repair of renewable energy technologies.

<sup>1</sup> Regulation (EU) 2020/852, Art. 16.

<sup>2</sup> Regulation (EU) 2020/852, Art. 10 (2).

Based on the activity descriptions and the technical screening criteria, Aurubis has assigned all the above-mentioned activities to the first environmental target, “Climate change mitigation,” since the focus of the activities identified is not on providing adaptive solutions for reducing climate risks.

Since Aurubis' core business and revenue-generating activities are currently not covered by the taxonomy, the above-mentioned activities essentially comprise the disclosure of taxonomy-eligible CapEx.

One flagship project that is having a considerable impact on the amount of the taxonomy-eligible CapEx reported is the extraction of carbon-free industrial heat from a sub-process from copper production for use in the Hamburg district heating system. Here Aurubis AG and the Hamburger Energiewerke GmbH heating company are expanding one of the largest industrial heat supply systems in Germany [Q Energy and climate, page 84](#). This project falls under activity 4.25 Production of heat/cool using waste heat.

Another taxonomy-eligible flagship project is the expansion of a solar park in Pirdop, which is one of the largest solar parks for internal power generation for a company in Bulgaria [Q Energy and climate, page 84](#) (7.6 Installation, maintenance and repair of renewable energy technologies). Aurubis is also making taxonomy-eligible infrastructure investments in energy efficient lighting and equipment in buildings (7.3 Installation, maintenance and repair of energy efficiency equipment) and in the charging infrastructure for electric vehicles (7.4 Installation, maintenance and repair of charging stations for electric vehicles in buildings [and parking spaces attached to buildings]).

Additional taxonomy-eligible projects include the purchase of tank wagons in Hamburg for freight transport (6.2 Freight rail transport), company cars purchased (6.5 Transport by motorbikes, passenger cars and light commercial vehicles) and various renovation projects (7.2 Renovation of existing buildings).

## TECHNICAL SCREENING CRITERIA FULFILLMENT AT AURUBIS

For the seven taxonomy-eligible activities listed, the fulfillment of the technical screening criteria was assessed at the individual project level with the help of checklist-based interviews and with the cooperation of the company and project managers. The technical screening criteria were analyzed and interpreted, and the results documented and substantiated with the appropriate verification documents and calculations.

## SUBSTANTIALLY CONTRIBUTE TO CLIMATE CHANGE MITIGATION

Some of the activities relevant for Aurubis are substantially contributing to climate change mitigation per se when being carried out (4.25, 7.4, 7.6), while for other activities a high level of energy efficiency has to be ensured for them to substantially contribute to climate change mitigation (7.2, 7.3). “Transport” activities fulfill the substantial contribution criteria if they result in low or no CO<sub>2</sub> emissions (6.2, 6.5).

Aurubis fulfills the substantial contribution criteria for a large part of the taxonomy-eligible projects, in particular for the Industrial Heat project as well as the installation of electric charging infrastructure and photovoltaic technology. Some of the taxonomy-eligible renovation and infrastructure projects as well as the electric and hybrid vehicles also fulfill the substantial contribution criteria.

## DO NO SIGNIFICANT HARM TO THE OTHER ENVIRONMENTAL OBJECTIVES

The second step is to ensure that in carrying out the activity, Aurubis does no significant harm to the other environmental objectives. With regard to the second environmental objective “Climate change adaptation” in particular, an analysis of the physical climate risks is to be carried out for all activities listed in Annex A. This criterion was centrally fulfilled at the Group level in cooperation with Corporate Risk Management. Since fiscal year 2021/22, Aurubis has conducted a climate risk analysis in accordance with the TCFD (Task Force on Climate-Related Financial Disclosures) [Q Glossary, page 274](#) for all companies relevant

to the EU taxonomy [Q Risk Report, page 168](#). Additionally, Corporate Risk Management conducts a risk review with local managers at all relevant company locations in order to work together towards appropriate adaptation solutions for any significant physical climate risks. Furthermore, the value chain of each respective activity was analyzed for its relevance to climate risks in order to ensure a holistic view of the effects of physical climate risks. The climate risk analyses carried out at Aurubis thus meet the requirements of Annex A, meaning none of the activities screened cause significant harm to the second environmental objective "Climate change adaptation."

A wide range of criteria have been defined at the activity level for the additional environmental objectives: "Sustainable use and protection of water and marine resources," "Transition to a circular economy," "Pollution prevention and control," and "Protection and restoration of biodiversity and ecosystems." These concern, among other things, legally binding requirements that apply or must be implemented in all EU member states. Since there are no taxonomy-eligible projects at non-European sites that fulfill the substantial contribution criteria, only projects at European company sites are subject to the taxonomy alignment assessment regarding the do no significant harm to the additional environmental objectives criteria. These fulfill the above-mentioned criteria based on the current legal framework. Additional criteria are covered by internal standards and guidelines or individually verified for a project.

The renovation and energy-efficiency projects that fulfill the substantial contribution criteria, the Industrial Heat project, as well as the installation of electric charging infrastructure and photovoltaic technology, do no significant harm to the other environmental objectives and, as such, are taxonomy aligned. For this year, there is not enough data available for electric and hybrid vehicles to be able to demonstrate that the criteria were met. So these are listed as taxonomy eligible, but not taxonomy aligned.

## COMPLYING WITH THE MINIMUM SAFEGUARDS

The minimum safeguards ensure that there are no violations or negative limitations with respect to the following topic areas:

- » Human rights, including worker and consumer rights
- » Corruption/bribery
- » Taxation
- » Fair competition

The minimum standards were reviewed at the Group level and are safeguarded at Aurubis through existing standards, Group guidelines, and standards of conduct for employees, suppliers and other business partners. Aurubis has processes for human rights due diligence, processes and training courses for detecting corruption and bribery, instruction in taxation and tax laws, rules of conduct, and instruction in and training on antitrust law. In the 2022/23 fiscal year, there were no convictions against Aurubis AG, any of its subsidiaries, or senior executives in any of the four topic areas. There are procedures and processes for all four topic areas mentioned, which also include inspecting the supply chain.<sup>1</sup> Compliance with the minimum safeguards can be considered fulfilled for all activities in the 2022/23 fiscal year.

## RESULTS OF THE TAXONOMY ALIGNMENT ASSESSMENT AT AURUBIS

Five taxonomy-aligned activities were identified at Aurubis, which can be assigned to the following EU Taxonomy activities:

- » 4.25 Production of heat/cool using waste heat
- » 7.2 Renovation of existing buildings
- » 7.3 Installation, maintenance and repair of energy efficiency equipment
- » 7.4 Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)
- » 7.6 Installation, maintenance and repair of renewable energy technologies

<sup>1</sup> The Business Partner Screening is described in detail in the Responsible supply chain chapter, which clearly reveals that the risk-based process implementation is not yet complete.

## ACCOUNTING METHODS AND KPIS IN ACCORDANCE WITH EU TAXONOMY

The key performance indicators published in the EU Taxonomy are calculated as in the Aurubis Group financial report in accordance with International Financial Reporting Standards (IFRS) and include all fully consolidated companies of Aurubis AG. Companies not included in the scope of consolidation, associated companies, and companies classified as held for sale pursuant to IFRS 5 are fundamentally not included in reporting in accordance with the EU Taxonomy. Double counts were prevented by only assigning a taxonomy-eligible project not already included under another activity to an enabling activity.

Aurubis is releasing the following key performance indicators for the 2022/23 fiscal year.

Please refer to the separate reporting sheets and to the mandatory tables at the end of the NFR [Non-Financial Report](#), page 107 for the breakdown of the numerator for the turnover, OpEx, and CapEx key performance indicators in keeping with the EU Taxonomy.

### Overview of key performance indicators in keeping with the EU Taxonomy

| Economic activities  | EUT turnover      |            | EUT CapEx      |            | EUT OpEx       |            |
|--|-------------------|------------|----------------|------------|----------------|------------|
|  | in € thousand     | in %       | in € thousand  | in %       | in € thousand  | in %       |
| <b>A. Taxonomy-eligible activities</b>   |                   |            |                |            |                |            |
| <b>A.1 Environmentally sustainable activities (taxonomy aligned)</b>   |                   |            |                |            |                |            |
| KPI environmentally sustainable activities (taxonomy aligned) (A.1)  | 0                 | 0          | 50,977         | 8          | 0              | 0          |
| <b>A.2 Taxonomy-eligible, but not environmentally sustainable activities (taxonomy non-aligned activities)</b> |                   |            |                |            |                |            |
| KPI taxonomy-eligible, but not environmentally sustainable activities (taxonomy non-aligned activities) (A.2)  | 0                 | 0          | 16,790         | 3          | 0              | 0          |
| <b>Total (A.1 + A.2)</b>   | <b>0</b>          | <b>0</b>   | <b>67,767</b>  | <b>11</b>  | <b>0</b>       | <b>0</b>   |
| <b>B. Taxonomy non-eligible activities</b>   |                   |            |                |            |                |            |
| KPI taxonomy non-eligible activities (B)   | 17,063,708        | 100        | 555,754        | 89         | 268,591        | 100        |
| <b>Total (A+B)</b>   | <b>17,063,708</b> | <b>100</b> | <b>623,521</b> | <b>100</b> | <b>268,591</b> | <b>100</b> |

## TURNOVER

The turnover KPI [Q Glossary, page 273](#) represents the proportion of the net turnover derived from taxonomy-eligible or taxonomy-aligned economic activities. The net turnover disclosed in accordance with the EU Taxonomy is based on the revenues defined and disclosed in the Consolidated Financial Statements of the Aurubis Group [Q Consolidated Financial Statements, page 212](#). The proportion of the net turnover derived from taxonomy-eligible and taxonomy-aligned turnover each amounts to 0% for fiscal year 2022/23.

## CAPITAL EXPENDITURES (CAPEX)

The CapEx KPI represents the proportion of capital expenditure associated with taxonomy-eligible or taxonomy-aligned economic activities. Capital expenditure in the year under review comprised acquisitions in tangible and intangible fixed assets before depreciation, impairment losses, and revaluations. Capitalized capital expenditures from CapEx projects that can be allocated to taxonomy-eligible or taxonomy-aligned activities are taken into account in the numerator when determining the respective share.

The following types of CapEx are present at Aurubis and included in the numerator for the CapEx KPI:

- » Assets and processes associated with taxonomy-eligible economic activities
- » Individual measures for the low-carbon implementation of the target activity, or the reduction of greenhouse gases that are implemented and operational within 18 months, and acquisitions from taxonomy-aligned activities.

The proportion of taxonomy-eligible capital expenditures from the total capital expenditures disclosed in the Consolidated Financial Statements amounts to € 67.8 million or 10.9%. € 51 million of this, or 8.2% of total capital expenditure, is taxonomy aligned. The largest share of CapEx reported as taxonomy aligned is attributable to the Industrial Heat project in Hamburg (€ 43.6 million). Taxonomy-eligible activities that do not fulfill the technical assessment criteria and, as such, are taxonomy non-aligned, amount to € 16.8 million or 2.7%.

The capital expenditures in keeping with the EU Taxonomy Regulation differ significantly from the capital expenditures in environmental protection measures disclosed in the Annual Report, due to the definition in the required taxonomy eligibility and alignment assessments. This is in part because Aurubis' core business and the associated production facilities are currently not eligible for credit in accordance with the Taxonomy Regulation. It is therefore not possible to reconcile these with environmental capital expenditures in the current fiscal year.

## OPERATING EXPENSES (OPEX)

The OpEx KPI represents the proportion of operating expenditure associated with taxonomy-eligible or taxonomy-aligned economic activities, or that refers to the purchase of products or services from taxonomy-aligned economic activities in accordance with the EU Taxonomy. Operating expenses disclosed in accordance with the EU Taxonomy include research and development expenditures and expenses for short-term leases, along with maintenance and repair costs.

The types of OpEx the EU Taxonomy stipulates are to be included are of secondary importance for Aurubis' business model.<sup>1</sup> Taxonomy-eligible and taxonomy-aligned OpEx are therefore disclosed as 0% for Aurubis in this fiscal year.

<sup>1</sup> The FAQ from December 19, 2022 defines the secondary significance of operating expenses as given if the operating expenses are irrelevant in relation to the business OpEx as defined by the EU Taxonomy and, as such, not material for the business model. This is the case for Aurubis in the 2022/23 fiscal year. The OpEx as defined by the EU Taxonomy is € 269 million compared to a business OpEx of € 17,020 million and as such, with a proportion of 1.6%, can be assessed as immaterial.

## CHALLENGES AND OUTLOOK

When the EU Taxonomy requirements were comprehensively implemented for the first time in the 2022/23 fiscal year, there were still uncertainties about the interpretation of the EU taxonomy regarding the analysis of the criteria and data collection, for example. Since the last EU Taxonomy Report, the existing framework has been tightened and expanded, resulting in deviations compared to the 2021/22 fiscal year regarding the classification of taxonomy-eligible economic activities. This has also had a quantitative impact on the level of the three key performance indicators. Due to the continued dynamic development of the EU taxonomy, deviations and adjustments are to be expected in future reporting periods as well.

In view of the first comprehensive EU Taxonomy Report, the analysis of Aurubis' economic activities in the context of the EU Taxonomy was significantly expanded and further developed with the involvement of a large number of stakeholders in the company. Because Aurubis' fiscal year differs from the calendar year, for the following 2023/24 reporting period, the first step for the remaining four environmental objectives is only the mandatory assessment and reporting of taxonomy eligibility (the "phase-in period"). Taxonomy alignment will also have to be assessed and reported starting in the following 2024/25 reporting period. Overall, uncertainty regarding the implementation of the taxonomy requirements remains. The framework conditions and specifications — especially regarding the possible inclusion of copper activities in the EU Taxonomy — are therefore continuously monitored and evaluated.

## Employer-related matters

### FUTURE-ORIENTED EMPLOYER

#### Future-oriented employer

##### *Ambition*

We create a trusting, collaborative working environment and foster diversity and commitment. We are passionately invested in the progress of the company and society.

##### *2030 targets*

- » 100 % of the relevant employees receive unconscious bias training.
- » >40 %<sup>1</sup> of employees take part in job rotation and job shadowing, while diversity is fostered at the same time.
- » At least 75 %<sup>1</sup> of the employees surveyed participate in pulse checks and feedback measures.

##### *2022/23 milestone*

*Status: achieved*

- » Development of a diversity action framework

Competent, productive and dedicated employees are the foundation of Aurubis' commercial success and continued development. Our aims: We create a work environment for close collaboration and promote diversity and commitment. We are passionately invested in the progress of the company and society.

All overarching activities related to our employees are managed at the Group level by the Corporate Human Resources (HR) division. The head of HR reports directly to the CEO, who is also the industrial relations director. HR is involved in the HR strategy of the entire Group, as well as the implementation and monitoring of the resulting HR instruments, especially those related to organizational and staff development, employer branding, compensation and fringe benefits, resource management, and supervising change initiatives. The work of the regional HR departments focuses first and foremost on local requirements. For issues that apply Group-wide, the local departments coordinate closely with the central HR division.

<sup>1</sup> In the time period from FY 2021/22 to 2029/30.

Our HR strategy is derived from the Group strategy and is based on our corporate values. We develop it continuously, taking into consideration labor market changes, social change, and trends in human resources that result in part from the shortage of skilled workers due to demographic change, and the difficult search for young talents and apprentices, among other issues. By analyzing these trends, we gain a better understanding of the labor market and the changing working conditions, as well as a more precise understanding of what adjustments are needed in our HR portfolio.

We launched a comprehensive transformation of HR in 2021. The first step in this realignment was revising our HR strategy with a time frame up to 2025. Implementation followed in the reporting year. We designed an HR operating model that is currently being rolled out in Germany. The needed changes identified in the concept sharpen our HR roles and strengthen us in future cooperation.

The digitalization of HR in Germany was another focus of the HR transformation. We introduced a digital personnel file in the reporting year. The digital pay slip was introduced for employees in Q3 2023. HR also plans to introduce a document management system that can be used to automatically generate documents in the coming fiscal year. We will initially focus on certificates and employment contracts with cover letters. We are further expanding the functionalities of our digital time-recording system for employees and managers. Improving workflows is helping us increase the degree of automation. Linking the various digital HR systems makes them easier for employees to use.

We established the internal Fit4Projects initiative to successfully implement future strategic projects. It provides our project managers with guidance in all HR-related topics, such as resource planning and staffing. As part of the revised Group strategy, we also created a Group engineering organization to allow for the faster implementation of site-specific and higher-level projects and to create synergies throughout the Group. The main focus in this reporting year was on staffing and recruiting for strategic growth projects, such as Aurubis Richmond, Georgia (US). Here HR is providing support with a human resources and training concept, a recruiting strategy, and a human resources campaign carried out in the year under review. Identifying and developing internal and external talent was an additional focus. We strive to facilitate additional attractive development and career opportunities in an engaging project environment for our internal talent and experts [Q Training and education, page 79](#).

#### **DIVERSITY IN AN INTERNATIONAL ENVIRONMENT**

A diverse workforce is a central concern of our HR work. Our Code of Conduct, the Human Rights Commitment and the Diversity Commitment, and the corporate values set out in them, serve as the basis for respectful cooperation [Q Anti-corruption, page 103](#). Our ambition is to ensure that racist motives, a person's ethnic or social background, gender or gender identity, religion or worldview, disability, age, family status, or sexual orientation do not play a role in hiring, compensation, career trajectories, or in personal interactions. We reject all forms of discrimination. We feel a diverse workforce promotes knowledge transfer, brings in different viewpoints, and creates open and trusting collaboration.

In line with our milestones, one focus of our work in the year under review was on strengthening this understanding of diversity in all areas. To foster this, the Group-wide training program "Together with Respect: Together for Human Rights and Against Discrimination at Aurubis" was launched [Q Human rights and decent working conditions, page 97](#).



Any person at Aurubis can contact the employee representatives, HR, the Corporate Legal Department, or their supervisors at any time to report any justified suspicion of discrimination. In addition, concerned parties can use the channels, such as the Compliance Portal, described in the “Anti-corruption” chapter to report violations of the law and of the Code of Conduct [Q Anti-corruption, page 103](#).

Increasing the proportion of female managers — independent of any legal stipulations — is another important goal at Aurubis. We have defined specific targets for the first and second management levels below the Executive Board and we regularly monitor their progress [Q Corporate Governance Report, page 18](#).

One of the most important measures for achieving these targets is our Women4Metals (W4M) initiative, with which we aim to increase the attractiveness of the entire metal industry for women. We considerably strengthened and expanded this initiative in the reporting year. We opened W4M up to external companies and associations for the first time at the London Metal Exchange (LME [Q Glossary, page 273](#)) in October 2022, for example. W4M is also now online with a microsite on the Aurubis website [www.aurubis.com/en/responsibility/people/women4metals](http://www.aurubis.com/en/responsibility/people/women4metals). After a kick-off with the new external partners and other interested organizations, along with several follow-up meetings, we defined a joint W4M road map. To further strengthen the initiative internally, we set up a project organization and conducted an internal kick-off with local representatives to introduce W4M at all Aurubis locations. Furthermore, through W4M we conducted an internal peer mentoring program, a mix & mingle lunch, monthly digital lunch impulse events, and Group-wide activities on International Women’s Day. The initiative has now grown to include more than 250 active members in the Group.

### AURUBIS AS AN ATTRACTIVE EMPLOYER

We offer our employees an attractive work environment and support them with options that help them establish good work-life balance. This is accomplished in part through more flexible and modern working-time models. This is how we increase

employee satisfaction and ensure that we remain attractive in comparison with other companies. This includes options for flextime, part-time and mobile working, of course. Employees with an office job can now work remotely for up to three-fifths of their working hours in coordination with their supervisors. In Germany, Aurubis also continues to offer the possibility of temporarily working part-time and maintaining a lifetime working-hour account.

Attractive compensation in line with the market is also part of an appealing working environment and good work-life balance. Compensation and fringe benefits are also regulated at a national level by collective agreements.

We are optimizing our application process with a Group-wide employer branding project. It aims to develop a global employer brand for the Aurubis Group and strengthen the perception of Aurubis as a top international employer. The Aurubis Ambassador Program also serves to strengthen internal and external employer branding. In the year under review, we continued our successful collaboration with an influencer to draw attention to the wide range of training opportunities available at Aurubis. Content was shared on TikTok, Instagram and YouTube social media channels. We consider it important to transparently depict the application process at Aurubis. The newly launched Aurubis IT career site is one example of this [it-jobs.aurubis.com](http://it-jobs.aurubis.com).

The method used for commuting to and from work is a very individual choice that can contribute to satisfaction, health and environmental protection. To promote environmentally friendly employee mobility, we created incentives for choosing low-emission vehicles. One of the largest continuous charging parks for electric vehicles in northern Germany was built at the Hamburg plant [Q Energy and climate, page 84](#). Other examples of our efforts in this area include the bicycle leasing options and subsidies for the Deutschlandticket for public transport we offer employees in Germany.

## Key figures

### Aurubis Group personnel structure

as at the reporting date September 30

|               | Employees |         |         | Female  |         |         | Male    |         |         |
|---------------|-----------|---------|---------|---------|---------|---------|---------|---------|---------|
|               | 2022/23   | 2021/22 | 2020/21 | 2022/23 | 2021/22 | 2020/21 | 2022/23 | 2021/22 | 2020/21 |
| Aurubis Group | 7,230     | 6,913   | 7,135   | 14 %    | 13 %    | 13 %    | 86 %    | 87 %    | 87 %    |
| Blue collar   | 4,168     | 4,018   | 4,285   | 4 %     | 4 %     | 4 %     | 96 %    | 96 %    | 96 %    |
| White collar  | 2,757     | 2,567   | 2,519   | 29 %    | 28 %    | 28 %    | 71 %    | 72 %    | 72 %    |
| Apprentices   | 305       | 328     | 331     | 12 %    | 13 %    | 14 %    | 88 %    | 87 %    | 86 %    |

### Employee turnover in the Aurubis Group

as at the reporting date September 30

|   | 2022/23 | 2021/22 | 2020/21 |
|---|---------|---------|---------|
| Fluctuation rate <sup>1,2</sup>                                     | 8.3 %   | 9.5 %   | 9.5 %   |
| Average length of employment in the company (in years) <sup>2</sup> | 13.3    | 14.0    | 14.4    |

<sup>1</sup> Excluding apprentices.

<sup>2</sup> Prior-year figures have been adjusted.

### Age structure

as at the reporting date September 30<sup>1</sup>

|             | 2022/23 | 2021/22 | 2020/21 |
|-------------|---------|---------|---------|
| <30 years   | 1,039   | 955     | 946     |
| 30–50 years | 3,610   | 3,381   | 3,412   |
| >50 years   | 2,276   | 2,249   | 2,446   |

<sup>1</sup> Excluding apprentices.

## TRAINING AND EDUCATION

### Training and education

#### *Ambition*

We provide high-quality vocational training and invest in forward-looking qualifications for employees.

#### *2030 targets*

- » 100% fulfillment of the continuing education allotment in hours (continuing education allotment: 18 hours per year for each employee)

#### *2022/23 milestone*

- » 18 training hours per employee per year on average

*Status: achieved*

In order to achieve our company vision and advance our strategy, we rely on a learning organization. We provide high-quality vocational training and invest in forward-looking qualifications and development for employees.

Human Resources (HR) is responsible for staff development. HR supports the other departments in building our employees' skills in a directed way, tailored to need. This helps us to meet current and future requirements and challenges in vocational training and continuing education.

To ensure that we have a sufficient number of employees with the right qualifications, we regularly compare our staffing needs with our offers for vocational training, entry-level jobs, and career development at Aurubis. We also identify the demand for employee qualifications and successors for different positions in annual performance reviews and in the yearly personnel planning process, in order to develop and safeguard specialized skills and management expertise in a purposeful way.

We use a qualification program to support the development of our employees. We offer supervisors at the foreman level a number of technical training sessions, for instance, as well as additional options for personal development, such as driver and equipment training or tutorials on time management. Moreover, we are further enhancing self-guided learning and the use of innovative learning methods in the Group. Since mid-2021, employees Group-wide have had access to our digital Corporate

Learning Academy, where they can take part in internal courses on specialized, personal and management skills, as well as watch educational films and presentations for independent and digital learning. Furthermore, it provides guidance for external course offerings. PC terminals, rental laptops, and workstations set up especially for the Corporate Learning Academy are available to employees without PC workstations.

From October 2022 to February 2023, we supported 34 participants from various sites with workshops, training sessions, and individual development talks in the OTrack (Orientation Track) program for the first time. The objective was for them to find their individual career paths to becoming managers, experts or project managers. Afterward, they received an individual development plan to support them in honing essential skills. There are plans to offer the program every two years.

Forward-looking and sustainable personnel development requires more than just imparting work skills. We also promote psychological and health-related skills to maintain a healthy and social work environment. At our site in Pirdop, Bulgaria, for example, an initiative was started to improve mental, emotional and social well-being. This heightened awareness for these issues while reducing prejudice so that those who need to can seek psychological support without stigma. Preventative measures, handling anxiety, and specific events on topics like burnout and loneliness are also part of the initiative. On top of that, we assume the costs for our employees in Pirdop to take part in five private psychotherapeutic appointments per person and year. This service is completely confidential. We plan to expand the initiative to include the topic of financial well-being by the end of 2023.

In addition to qualification and development programs geared toward promoting the necessary skills, such as for the Aurubis Operating System [Q Glossary, page 272](#) and in project management, we also rely on dialogue formats and learning platforms for networking and discussing best practices (e.g., expert panels and online learning groups). The program also offers one to two-hour micro-learning units ("Learning Nuggets") so that participants can learn and test new skills. In the short "Aurubis Essentials" seminars, colleagues teach one another about interdisciplinary topics, promoting a uniform, company-wide understanding of knowledge relevant to Aurubis, such as about the business model.

The insights from using these digital learning formats are valuable for the ongoing development of our learning organization.

Aurubis is one of the largest vocational training companies in the chemical industry in Germany. We are proud of our vocational training and retention rate, which is an important contribution to securing qualified employees.

At the Hamburg and Lünen training sites, we have two modern vocational training centers that serve as a foundation for our increased number of apprenticeships. At these sites, we also conduct cooperative training with local companies whose apprentices complete basic vocational courses with us. Our Hamburg training center received the highest rating, 5 out of 5 possible stars, as a top trainer in the Capital study “Deutschlands beste Ausbilder 2022” (Germany’s Best Trainers in 2022)

[www.capital.de/karriere/exklusive-studie--das-sind-deutschlands-beste-ausbilder-2022-32825628.html](http://www.capital.de/karriere/exklusive-studie--das-sind-deutschlands-beste-ausbilder-2022-32825628.html).

In the reporting year, we continued our dual apprenticeship program at the site in Pirdop with a local vocational school in Zlatitsa, and in cooperation with two large neighboring mines and local subcontractors. The first dual students completed their practical training on site in 2022, and the second class is in training until the end of 2023.

The Hamburg site has participated in the AV 10+ internship model since 2007, which provides young adults from a range of occupational areas with the skills they need to start apprenticeships. Five of the twelve participants were accepted as apprentices in the reporting year, while the remaining participants started external apprenticeships or have gone on to pursue higher education. Aurubis also took on an apprentice in Lünen from a similar program focusing on entry-level qualifications.

We are continuing the digital and flexible training solutions that were introduced during the coronavirus pandemic. Furthermore, we are relying more and more on digital learning material and concepts. Apprentices are increasingly being provided with tablet computers, for instance, which makes learning more efficient and independent, and also increasingly paperless.

During the reporting year, we identified the development of a university marketing strategy as a focus topic and ensured that HR had the necessary staff resources at hand. As a result, Aurubis regularly takes part in career fairs, school and university events, and digital offerings for future career starters. Aurubis also collaborates with partner universities, supports cooperation programs, offers internships to students in Germany, and facilitates thesis projects to reach out to young talents.

## Key figures

### Training and education

|                                      | 2022/23 | 2021/22 | 2020/21 |
|--------------------------------------|---------|---------|---------|
| Apprenticeship rate in Germany       | 7.5 %   | 8.1 %   | 8.4 %   |
| Apprentice retention rate in Germany | 67.3 %  | 79.1 %  | 71.6 %  |

### Training hours

|  | 2022/23 | 2021/22 | 2020/21 |
|--|---------|---------|---------|
| Average number of training hours per employee in the Group           | 21.1    | 15.3    | 13.9    |
| Blue collar  | 19.2    | 12.0    | 13.7    |
| White collar   | 24.1    | 20.9    | 14.2    |
| Percentage of employees receiving training in the Group <sup>1</sup> | 98.3 %  | 83.6 %  | 61.2 %  |
| Blue collar  | 99.2 %  | 76.3 %  | 58.6 %  |
| White collar   | 97.5 %  | 95.6 %  | 65.5 %  |

<sup>1</sup> Consolidation of the data for the respective time periods results in marginal deviations in the percentage of (total) employees trained and the breakdown into blue/white collar. This is attributed to employees who switched jobs during the year.

## OCCUPATIONAL HEALTH AND SAFETY

### Occupational health and safety

#### Ambition

We prevent work-related accidents, injuries, and illnesses (Vision Zero).

#### 2030 targets

- » LTIFR  $\leq 1.0$

#### 2022/23 milestone

- » ISO 45001 certifications at all production sites

*Status: achieved*

A fatal accident occurred at the Hamburg site in May 2023 shocked us all. Three employees died during maintenance work due to nitrogen leaking from a supply line. In the meantime, the results of the investigations are available regarding the cause of the accident. In the following, we will outline the implementation status of the additional safety measures derived from the results. First, we will explain fundamental concepts and measures we implemented to work towards our occupational health and safety targets during the fiscal year.

As a responsible company, it is a matter of course for Aurubis to take measures to maintain the health and performance of everyone on our premises and to protect them from accidents and illness. The Health and Safety (H&S) department in the Group creates the overall conditions for preventing work-related accidents and illness on behalf of the Group and in the interests of the production units. Our aim is Vision Zero, i.e., zero work-related injuries and illnesses in our area of responsibility. We have set the objective of lowering the accident rate to  $\leq 1.0$  by 2030. This is expressed using the LTIFR (lost time injury frequency rate) KPI [Q Glossary, page 273](#), which describes the number of work-related accidents with at least one lost shift or day of work per one million hours worked.

Group Health & Safety and Behavioral Management (G-OHS) manages H&S and establishes minimum occupational safety standards for the entire Group by issuing process instructions in addition to the Corporate Policy on Occupational Health and Safety. G-OHS audits adherence to these process instructions throughout the Group. In the 2021/22 reporting year, we began auditing our sites in accordance with the "Medical Emergency

Preparedness" and "Lockout-Tagout" process instructions. The audits were concluded for all sites in the 2022/23 fiscal year. In fiscal year 2022/23, internal audits regarding the "Confined Spaces" and "Working at Height" process instructions followed, which will be concluded for all sites in calendar year 2023.

G-OHS is part of the corporate department Continuous Improvement | H&S, the head of which reports directly to the Chief Operations Officer Custom Smelting & Products (COO-CSP). In line with our targets for the fiscal year, all production sites across the Group were certified in accordance with the ISO 45001 international standard for occupational safety management systems by the end of the fiscal year

[Q Glossary, page 273](#) [Q Certifications by site, page 106](#).

The site managers and plant heads play a key role in realizing occupational safety measures. They are responsible for ensuring compliance with applicable laws and ordinances on occupational health and safety, the relevant corporate policy, and the current process instructions. Our intention here is to identify and evaluate health risks and help implement suitable measures to protect everyone in our area of responsibility. Moreover, employee representatives are involved in H&S issues: Through the reporting line to the Executive Board, G-OHS reports to the general Works Council committee and the European Works Council during committee meetings.

The H&S policies and process instructions apply to all individuals working at the site, including temporary workers and contractors. Every person who enters our sites is registered. Temporary workers and contractors are briefed on risks, protective measures, rules of conduct, and what to do in an emergency at the specific site before they start work. In addition, we offer them the option of taking part in biomonitoring [Q Glossary, page 272](#), and provide them with our industry-specific personal protective equipment (PPE) for special types of work.

Accidents involving temporary workers and contractors are recorded and evaluated just like accidents and other incidents with high potential for serious injury or death that occur involving our own employees. Both are part of the monthly reports to the entire Executive Board. Every accident with lost time is directly reported by the local entities to G-OHS and the COO-CSP. We use this to derive Group-wide, site-specific targets guidelines for reducing accident frequency for contractors.

Our risk assessments include both current and future work processes in the company. In addition to activities in normal operations, these include maintenance, servicing and repair processes in particular. The risk assessments cover hazards in normal operations and special work assignments. We systematically collect, evaluate and document health hazards and individual requirements in the work area.

In accordance with the instructions issued by G-OHS, the local departments systematically investigate accidents to determine their technical, organizational, and conduct-based causes. The causes determined from these investigations and the measures derived from them are communicated throughout the Group.

In addition to technical and organizational precautions, every individual's occupational safety conduct is essential. The "10 Golden Rules" (10forZero) of occupational safety that were centrally communicated and made the subject of local training sessions in 2021 and 2022 are still applicable Group-wide. These rules are communicated to new employees as part of their onboarding, for example. In addition, initiatives on behavior-based safety and on leadership and communication in occupational safety have been ramped up again since the end of the coronavirus pandemic, for instance at the Hamburg site. At the Lünen, Pirdop and Beerse sites, we held multi-day interactive safety days for all employees.

We continued to integrate the Health and Safety pillar into the Aurubis Operating System. For example, we standardized the maintenance processes from the specification stage through to planning, implementation and beyond. We consistently included safety-relevant aspects such as the critical nature and dissemination of information. Moreover, we continued developing our Asset Lifecycle Management with respect to occupational safety criteria.

An additional focus during the reporting year was collaboration with our contractors. At our site in Hamburg, we hosted our Supplier Days for the second time. During these events, which are especially dedicated to cooperation with our contractors, we received feedback from participants in Hamburg that the Supplier Days had led to a noticeable improvement in the flow of information and in the quality of collaboration. As a result, we held similar events at the Pirdop, Beerse, Olen and Berango sites as well. These events are designed as a workshop and dialogue platform with a focus on the topic of occupational safety, and they serve to reinforce our clear Vision Zero target while emphasizing the responsibility and role that all participants have. This includes conveying our safety concept and rules, our concept for providing instruction, and communication and coordination of work, as well as creating a platform enabling partner companies to meet and talk to one another.

In May 2023, an accident occurred that resulted in the deaths of three employees. A thorough investigation is our highest priority. We derived, communicated and implemented initial specific technical and organizational safety measures from the available results of the investigations into the accident's cause. For example, we initiated an audit, as well as tutorials, training sessions, and effectiveness checks of processes and standards related to safe work procedures in maintenance and repair work at all sites. Furthermore, we conducted training sessions on the hazardous substance nitrogen and optimized protective measures and control and warning mechanisms for work carried out on gas-conducting infrastructure. By August 2023, a total of 366 operative managers had taken part in a mandatory refresher training course in Hamburg on how to apply the permit-to-work procedure. All plant managers have since completed training, which addressed lockout-tagout in particular, together with practical implementation tests and improved effectiveness checks. All of the roughly 450 lockout-tagout instructions had also been reviewed by late September to ensure that they were up to date, complete and effective. In the area of the plant facility involved, additional technical and organizational safety barriers have been implemented in the meantime to prevent a similar incident from ever happening again.

In addition, we have an independent external occupational safety consultancy review our occupational safety management. The multistage process encompasses the site organizations and relevant corporate functions.

Routine health exams and occupational checkups are provided to the employees at all sites. Internal company doctors are available at the Hamburg and Pirdop sites. At all of the other sites, we commission freelance occupational physicians with carrying out obligatory and optional checkups. The additional offerings of the plant medical offices extend from flu vaccinations and medical checkups to addiction prevention, as well as supporting measures for the heart and circulatory system.

One ongoing special focus is our employers' exposure to hazardous substances, particularly lead. As a company that processes lead, we regularly analyze the blood lead levels of the relevant employees. As a member of the ILA (International Lead Association), we have already entered into voluntary commitments to limit blood lead levels in the past. The new "Technical Rules for Hazardous Substances Lead" (TRGS 505) established a lower limit value for lead in the blood (15 µg of lead/100 ml of blood) in Germany back in 2021. Currently, the European Commission's recommendation includes this value as the future limit for the entire EU. We discuss experience and best practices in cross-site lead working groups.

We considerably expanded the supply of powered air purifying respirator (PAPR) systems for our employees and contractors during the past few years. This type of respiratory protection can be used by employees over an entire shift without breathing resistance or strain on the circulatory system. We are actively working with the manufacturers on permanently optimizing the devices.

In addition to increasing understanding of the proper way to put on and take off work clothes and respirators, we also reinforced the standards for one-on-one meetings between managers and employees with the aim of improving compliance with protective

measures and of discussing further opportunities for improvement during individual activities. Since we have utilized the current technical possibilities to the greatest possible extent, we're focusing more intensely on personal hygiene to avoid the oral intake of hazardous substances.

In pending new construction projects, we take both technical and organizational measures into account, in line with modern standards, to prevent contact with, or the carryover of, hazardous substances.

In the reporting year, the Hamburg, Pirdop, Olen, Beerse and Berango sites also offered various initiatives on healthy management and mental well-being. This enables us to boost and maintain our employees' health. For example, a mental health program was started in Bulgaria that provides online tutorials on the topic of mental health, in collaboration with a service provider specialized in workplace mental health [Q Training and education, page 79](#). Since January 2022, Aurubis AG has also offered all employees and managers free consultation on this topic through an external institute. This offering comprises the areas of professional and workplace-related issues, family and partnership, psyche and health, and personality in particular.

## Key figures

### Occupational health and safety

|   | 2022/23 | 2021/22 | 2020/21 |
|---|---------|---------|---------|
| Absolute number of accidents <sup>1</sup>     | 33      | 34      | 55      |
| of which fatal accidents                      | 3       | 0       | 0       |
| LTIFR <sup>2</sup>                            | 3.2     | 3.2     | 5.1     |
| Fatal accidents of third parties at our sites | 0       | 0       | 0       |

<sup>1</sup> Including deaths.

Including the Beerse (Belgium) and Berango (Spain) sites starting June 1, 2020. Excluding Cablo Metall-Recycling and Handel GmbH, Ferbellin (which has belonged to the CABLO GmbH joint venture with the TSR Recycling GmbH & Co. KG recycling company since June 1, 2021 and in which Aurubis holds a 40 % stake) and Schwermetal Halzeugwerk GmbH & Co. KG starting June 1, 2021. As of August 1, 2022, excluding the sold sites Zutphen (Netherlands), Birmingham (United Kingdom), Dolný Kubín (Slovakia), and Mortara (Italy). Including Aurubis Richmond (US) starting October 1, 2022.

<sup>2</sup> Relating to Aurubis employees.

## Environmental matters

### ENERGY AND CLIMATE

#### Energy and climate

##### Ambition

We will be carbon-neutral well before 2050.

##### 2030 targets

- » -50% absolute Scope 1 and Scope 2 emissions (reference year 2018)
- » -24% Scope 3 emissions per ton of copper cathodes<sup>1</sup> (reference year 2018)

##### 2022/23 milestone

- » ISO 50001 at all production sites

*Status: achieved*

As an energy-intensive company, we assume responsibility for climate protection. The individual production steps in our value chain require a great deal of energy and are the main source of direct and indirect CO<sub>2</sub> emissions (Scope 1 and 2) in the Group. However, taking the entire value chain into consideration, the majority of CO<sub>2</sub> emissions are generated in the upstream and downstream parts of our value chain (Scope 3), meaning they originate from our suppliers, customers and service providers. The activities of the mining companies from which we source copper concentrates account for most of our Scope 3 emissions.

The products we manufacture, on the other hand, contribute to reducing CO<sub>2</sub> emissions in business and society because they play a central role in the transmission of renewable energies, in applications that boost energy efficiency, and in electric vehicles: Electric cars contain nearly four times as much copper as vehicles

with conventional combustion engines, and building and connecting an offshore wind turbine to the energy grid requires up to 30 tons of copper. This makes it all the more important for the overall footprint across all stages of the value chain that we strive for low-emission production and supply chains.

Securing our energy supply and preventing CO<sub>2</sub> emissions are of vital importance to us. Accordingly, the Group-wide Corporate Energy & Climate Policy outlines how to secure and optimize both of these aspects. The policy contributes to achieving our strategic climate and energy targets. It clearly defines the roles and responsibilities of the sites and corporate departments in this area. The head of the Corporate Energy & Climate Affairs department is responsible for the implementation and further development of this Group-wide policy and reports directly to the CEO.

The Corporate Energy & Climate Affairs department also assists the sites in arriving at a unified understanding. The German Aurubis site energy management officers, for example, are members of an energy efficiency network that holds annual workshops. Topics covered in the workshops include completed and planned energy efficiency projects, results of external energy audits, the current legal situation, and aid programs or implementation assistance for new requirements.

Moreover, the corporate department oversees Group-wide energy management and energy monitoring systems. Energy management systems (EMS) contribute to efficiently steering energy consumption and identifying energy savings potential. Our energy management and monitoring systems comply with high standards: All of our production sites have an EMS certified in accordance with ISO 50001 [Q Glossary, page 273](#).

<sup>1</sup> Refers to copper cathodes from internal production.



We determine climate-related opportunities and risks, and the measures derived from them, by linking our risk management with our energy and environmental strategy. Both are part of the overarching company strategy, which also includes the sustainability targets. When carrying out the risk and opportunity analysis, we consider pending legal requirements, technological developments, and compliance-related, reputational and physical risks, and observe whether there are any significant risks on the energy markets.

The CDP questionnaire gathers and evaluates data and information about companies' CO<sub>2</sub> emissions, climate risks, and reduction targets and strategies, assessing their responsibility in the supply chain in the process. The CDP rated Aurubis' questionnaire with an A- in the 2022 Climate Change program for calendar year 2021. Participation is voluntary

[www.aurubis.com/en/sustainabilityreporting](https://www.aurubis.com/en/sustainabilityreporting).

Risk management also serves as the foundation for reporting pursuant to the recommendations of the TCFD (Task Force on Climate-Related Financial Disclosures). The objective of TCFD reporting is for companies to disclose their risks related to climate change. First and foremost, the purpose is to support investors and lenders in financially assessing these risks. The TCFD recommendations pertain to four aspects: governance, strategy, risk management, and metrics and targets. In addition to our various and ambitious decarbonization activities, Aurubis has also analyzed the risks brought about by climate change. Our first TCFD report significantly expands the mapping of physical climate risks to date, as it is the first analysis of our sites and key suppliers with respect to the impacts of the warming scenarios described above. We will take the information gained from this process regarding possible climate adaptation measures into account in our long-term investment planning. [www.aurubis.com/en/sustainabilityreporting](https://www.aurubis.com/en/sustainabilityreporting).

## OUR PATH TO DECARBONIZATION

At the end of 2019, Aurubis joined the UN Global Compact Business Ambition for 1.5°C, thus expressing our commitment to work on science-based CO<sub>2</sub> reduction targets. Our involvement in the KlimaWirtschaft foundation (formerly Stiftung 2°) underlines our commitment to climate protection. We have been a sponsor company of this foundation since 2021. For this status, the foundation requires us to make an extraordinary commitment to ambitious climate protection combined with competitive business activity. In the scope of panel discussions and other foundation events, we share our ideas and experience with other sponsor companies and additional participants from the political realm and civil society.

In June 2021, the Science Based Targets initiative (SBTi [Q Glossary, page 274](#)) validated Aurubis AG's CO<sub>2</sub> reduction targets, thus confirming that our targets contribute to limiting global warming to 1.5°C pursuant to the Paris Agreement on Climate Change. We have set out to reduce the absolute Scope 1 and Scope 2 emissions, meaning CO<sub>2</sub> emissions generated by burning fuels in internal facilities and those related to purchased energy, by 50 % by 2030 compared to reference year 2018. We want to reduce Scope 3 emissions, which arise in the upstream and downstream stages of the value chain, by 24 % per ton of copper cathodes during the same period as well. To ensure that our reduction targets are taken into account in projects, Aurubis also reviews the extent to which Group-wide sustainability targets are fulfilled, which include CO<sub>2</sub> reduction targets, as part of the project assessment process.

We are continuously implementing a detailed road map to achieve our ambitious and science-based climate targets. Regarding Scope 1 and Scope 2 emissions, it includes technical measures such as decarbonizing our plant facilities by using green hydrogen [Q Glossary, page 273](#) instead of fossil fuels and electrifying our

production. Utilizing industrial waste heat from our production process and expanding the purchase of green electricity are two additional measures that are included. Close cooperation with actors in our supply chain, as well as intensified recycling activities, lead to approaches that further reduce our Scope 3 emissions.

We aspire to make our production carbon-neutral well before 2050. Because we have already implemented many energy efficiency and decarbonization measures in the past, it's becoming more and more of a challenge to identify and execute additional steps to boost efficiency. Today, we can achieve only marginal improvements in the plants despite equally high investments. We have gradually reached the technological limits for reducing energy consumption and emissions. The challenges are growing, furthermore, since we are using a higher volume of complex recycling raw materials with relatively low metal contents, as well as complex copper concentrates. This requires a higher specific energy input for processing.

As a result, we focus not only on further increasing efficiency but also on solutions that save energy and thus prevent CO<sub>2</sub> outside our plants. This includes the Industrial Heat project in Hamburg, which has been supplying our heat to the HafenCity East district since 2018. Plans to expand the project have been underway since early 2022 [www.aurubis.com/en/industrialheat](https://www.aurubis.com/en/industrialheat). With a conversion of a sub-process in copper production at the Aurubis plant in Hamburg, which is scheduled for summer 2024, we will be heating up to 20,000 apartments each year in cooperation with the Hamburg city energy utility starting in the 2024/25 heating period, reducing CO<sub>2</sub> emissions in the city by up to 100,000 t. The planned heat supply represents the biggest use of industrial heat in Germany.

We are also working on approaches to replacing fossil fuels with renewable energy. For example, we installed an electrically powered plasma furnace at the Beerse site in 2017 and cover part of our energy needs with internally generated electricity from process heat. We installed steam turbines to generate electricity in Hamburg, Lünen (both in Germany), and Pirdop (Bulgaria). The calculated savings potential is 30,000 t of CO<sub>2</sub> per year compared to conventional electricity use.

We constructed an internal 10 MW solar plant, Aurubis-1, at the Aurubis site in Pirdop (Bulgaria). It came on stream at the end of 2021. It is currently the largest solar plant for in-house electricity production for a company in Bulgaria, and comprises over 20,000 solar panels on a remediated and recultivated landfill of 100,000 m<sup>2</sup>. In the reporting year, the Aurubis-1 solar park generated approximately 13,500 MWh of electricity for the Pirdop plant, significantly reducing external electricity consumption. The electricity generated is equivalent to the annual needs of just under 4,200 households.<sup>1</sup> The site's goal is to cover 20% of its total energy needs from renewable sources by 2030. Two expansion phases for the solar plant are being implemented for this purpose. The first expansion phase (Aurubis-2) is set to have 7.6 MW of power, the additional expansion phase (Aurubis-3) 6.0 MW. The construction work is scheduled to conclude in late March 2024. For all three plants combined, we expect an annual CO<sub>2</sub> reduction of 34,000 t.

In order to further decarbonize energy consumption at the sites where electricity generated in-house is not sufficient, Aurubis resorts to external solutions. For instance, Aurubis Olen (Belgium) concluded a power purchase agreement with the Dutch Eneco energy supply company in 2022. In the process, a 12 MW connected load will be sourced from the Belgian offshore wind

<sup>1</sup> Based on the current, average annual consumption for a two-person household of 3,252 kWh, see [www.destatis.de/EN/Themes/Society-Environment/Environment/Environmental-Economic-Accounting/private-households/Tables/electricity-consumption-private-households.html](https://www.destatis.de/EN/Themes/Society-Environment/Environment/Environmental-Economic-Accounting/private-households/Tables/electricity-consumption-private-households.html)

farm SeaMade over a period of ten years. Since January 2023, at least 90% of the electricity generated externally for Aurubis Olen has come from renewable energies. This agreement allows us to cut 42,000 t of CO<sub>2</sub> emissions at the site annually.

The use of renewable energies on a large scale is a challenge for us, since generating them is still associated with fluctuations in energy supply. Our production processes require a constant energy supply. We are therefore working on measures to make our energy uptake more flexible and to feed excess energy into the electricity supply network. This will allow us to react to fluctuating energy availability and use more renewable energies. To provide an example, we also take part in the secondary electricity balancing market with the copper tankhouses we operate at our Hamburg and Lünen sites. In doing so, we make these plant facilities' electrical power available for defined periods to safeguard the grid frequency stability.

Another example is our 10 MW power-to-steam facility, which we have been operating at the Hamburg site since 2019. This is an electrode steam boiler that can flexibly take some of the power from our natural gas-operated steam generator during phases in which there is a surplus of renewable energy. Assuming that 100 % of the power supply comes from renewable energies, we could cut up to 4,000 t of CO<sub>2</sub> annually with this plant facility alone.

Green hydrogen is considered a key technology for decarbonizing industry. Aurubis sees great potential for using hydrogen efficiently and cost-effectively in the anode furnaces. We completed a comprehensive test series in the Hamburg plant in 2021. In testing, hydrogen was used as a reducing agent in place of natural gas in the process step involving the anode furnaces. This reduced the proportion of oxygen in the copper melt in the anode copper, due to the reaction with hydrogen. This forms water vapor rather than CO<sub>2</sub>, as when natural gas is used as a reducing agent.

The procedural results of this test series have encouraged us to take on additional activities involving hydrogen. During the reporting year, for example, we were one of the first copper smelters in the world to decide to invest in hydrogen-ready anode furnaces. The new furnaces will be installed in the Hamburg plant as part of the plant's routine maintenance shutdown slated for spring 2024. They hold potential savings of about 5,000 t of CO<sub>2</sub> per year when only hydrogen is used. The new furnaces decarbonize production while providing more flexibility in process management. This will help us process more complex metal-bearing copper concentrates in even larger amounts, and thus extract additional valuable raw materials even more efficiently in the future to cover rising demand coming from electric vehicles, for example.

Aurubis is also a partner in the Northern German Living Lab (NRL). This alliance for the energy transition, which extends across German federal states, works together on concrete solutions to achieve climate neutrality. In 2022, Aurubis tested the use of green hydrogen with the NRL, for example.

Along with hydrogen, ammonia can also contribute to the decarbonization of industry. We started a pioneering test series on the use of blue ammonia in copper rod production at the Hamburg site. In the production of blue ammonia, the resulting carbon dioxide is separated and stored underground using carbon capture and storage (CCS). The blue ammonia used for testing was supplied as part of the deepened hydrogen cooperation between Germany and the United Arab Emirates. But the goal to directly use ammonia as a fuel Aurubis originally envisioned proved unfeasible in view of environmental regulations and high product quality standards. As a result, Aurubis does not plan to pursue the direct use of ammonia as a fuel in this area of application. In addition to its use as a fuel, ammonia has the ideal properties for serving as a hydrogen carrier. The technology used to recover the hydrogen from the ammonia by splitting the gas back into hydrogen and nitrogen is called a cracker. Aurubis is currently exploring the potential for building an ammonia cracker.

When making investment decisions, we assess and consider the extent to which these measures will reduce our greenhouse gas emissions and therefore reduce our need for emission certificates from the European Emissions Trading System (EU ETS) accordingly.

As a multimetal company, Aurubis wants to contribute to the transportation shift as well, and so is intensifying its focus on sustainability in employee mobility. In 2021, one of the largest interconnected charging parks in northern Germany was commissioned with 150 charging points. This means that all of our employees can charge their electric cars at our site, while we encourage those who have not yet switched to e-mobility to use electric cars. We are modifying our internal vehicle fleet as well. At the Hamburg plant, for example, we replaced 38 diesel forklifts with electric forklifts in 2022.

Our ambition is to continuously improve data quality and granularity for Scope 3 emissions, since these form an important basis for reducing these emissions. To calculate the Scope 3 emissions for calendar year 2022, we were able to draw on mine data for the category of purchased goods and services for over 60% of the copper concentrate purchased. This allowed us to use more exact and supplier-specific data. For the remaining volume, we used the ICA average, which was adjusted in September 2022 and is significantly lower. In transport, more differentiated data were available on the type of transport. This made it possible to better differentiate the modes of transport and evaluate them using the associated, more specific emission factors.

In the coming fiscal year, we intend to reassess and sharpen our 2030 target for Scope 3 emissions based on the improved data now available. We will also continue to pursue our ambitious plans and focus on continuous improvement. A higher level of transparency will allow us to better address and implement these standards.

## Key figures

### Energy consumption

| in million MWh  | FY<br>2022/23 <sup>3</sup> | 2022        | 2021        | 2020        |
|---|----------------------------|-------------|-------------|-------------|
| Primary energy consumption <sup>1</sup>                 | 1.75                       | 1.76        | 1.85        | 1.72        |
| Secondary energy consumption <sup>2</sup>               | 1.84                       | 1.85        | 1.94        | 2.00        |
| <b>Total energy consumption within the organization</b> | <b>3.60</b>                | <b>3.62</b> | <b>3.79</b> | <b>3.72</b> |

<sup>1</sup> Including energy consumption for on-site vehicle traffic.

<sup>2</sup> Including electricity for oxygen generation.

<sup>3</sup> The environmental KPIs for fiscal year 2022/23 were estimated based on data for calendar year 2022. This assumes the linear dependence of our environmental figures on our production amounts. Cathode output for the Aurubis Group was therefore applied as a conversion mean (calendar year 2022: 1,112,896 t, FY 2022/23: 1,108,662 t). The environmental key figures relating to the calendar year are the standard for us, however, as these comply with the other legal requirements for determining environmental key figures. The figures presented for FY 2022/23 are reliable, but may differ from the actual figures, as some influences can only be determined after the end of the year.

### CO<sub>2</sub> emissions<sup>1</sup>

|  |  | FY<br>2022/23 <sup>2</sup> | 2022         | 2021         | 2020         |
|--|--|----------------------------|--------------|--------------|--------------|
| Scope 1<br>(emissions produced as a direct result of burning fuels in internal facilities) | in 1,000 t CO <sub>2</sub>                 | 553                        | 555          | 559          | 540          |
| Scope 2 <sup>3</sup><br>(emissions related to purchased energy, e.g., electricity)         | in 1,000 t CO <sub>2</sub>                 | 769                        | 772          | 1,047        | 1,023        |
| <b>Total (Scope 1 + 2)</b>   | in 1,000 t CO <sub>2</sub>                 | <b>1,322</b>               | <b>1,327</b> | <b>1,605</b> | <b>1,563</b> |
| Scope 3 <sup>4</sup><br>(other indirect emissions)   | in 1,000 t CO <sub>2</sub>                 | 4,097                      | 4,113        | 6,181        | 5,940        |
| <b>Specific Scope 3 emissions</b>  | in t CO <sub>2</sub> per t copper cathodes | <b>3.70</b>                | <b>3.70</b>  | <b>5.55</b>  | <b>5.53</b>  |

<sup>1</sup> Aurubis reports its CO<sub>2</sub> emissions using the methods of the "EU Emissions Trading System (EU ETS): The Monitoring and Reporting Regulation (MRR) — General Guidance for Installations" and "The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)". In accordance with the emissions trading system, emissions from diesel vehicles are not included. However, they make up a very small percentage compared to other sources. Scope 2 emissions are reported here according to the market-based method [Q Glossary, page 273](#).

<sup>2</sup> The environmental figures for FY 2022/23 were estimated based on data for the 2022 calendar year. This assumes the linear dependence of our environmental figures on our production amounts. Cathode output for the Aurubis Group was therefore applied as a conversion mean (calendar year 2022: 1,112,896 t, FY 2022/23: 1,108,662 t). The environmental key figures relating to the calendar year are the standard, however, as these comply with the other legal requirements for determining environmental key figures. The figures presented for FY 2022/23 are reliable, but may differ from the actual figures, as some influences can only be determined after the end of the year.

<sup>3</sup> From 2021 to 2022, Scope 2 emissions fell by around 30%, since we expanded our procurement of green electricity.

<sup>4</sup> To calculate the Scope 3 emissions for calendar year 2022, we were able to draw on mine data for the category of purchased goods and services for over 60% of the copper concentrate purchased. This allowed us to use more exact and supplier-specific data. For the remaining volume, we used the ICA average, which was adjusted in September 2022 and is significantly lower. In transport, more differentiated data were available on the type of transport. This made it possible to better differentiate the modes of transport and evaluate them using the associated, more specific emission factors.

## ENVIRONMENTAL PROTECTION

### Environmental protection

#### Ambition

We produce with the smallest environmental footprint in our sector.

#### 2030 targets

- » -15 % specific dust emissions in g/t of multimetal copper equivalent (reference year 2018)
- » -25 % specific metal emissions to water in g/t of multimetal copper equivalent (reference year 2018)

#### 2022/23 milestones

*Status: achieved*

- » ISO 14001 at all production sites
- » Reduction of specific metal emissions to water by 50% in g/t of copper (Cu) output (reference year 2012)
- » Reduction of specific dust emissions by 15% in g/t of Cu output (reference year 2012)

Our objective is to produce in a way that minimizes the environmental impact of our business activities, to allow for the most environmentally friendly and safe manufacture of our products. We therefore strive to further improve our environmental footprint, which is already very small for our industry. This includes maintaining air, water, and soil quality and biodiversity in our plants and the surrounding areas, as well as the responsible handling of waste, hazardous substances, and water use. We view and manage these environmental aspects holistically in our environmental management system.

The upstream and downstream risks of our business activities on the environment are analyzed in our Business Partner Screening [Q Responsible supply chain, page 99](#). The head of Corporate Environmental Protection reports to the Chief Operations Officer Multimetal Recycling (COO-MMR); together, they are responsible for strategic positioning. Environmental officers oversee the environmental protection responsibilities at the individual production sites. The principles of our Company Guidelines on Environmental Protection provide a framework for safeguarding

our uniform, Group-wide environmental standards. They are enshrined in the Corporate Policy on Environmental Protection [www.aurubis.com/en/responsibility/environment-energy-and-climate/environmental-protection-in-the-group/guidelines-and-environmental-management](http://www.aurubis.com/en/responsibility/environment-energy-and-climate/environmental-protection-in-the-group/guidelines-and-environmental-management).

We have set Group-wide targets for environmental protection. The production sites implement local measures to achieve these targets. Environmental performance is monitored and controlled using environmental KPIs, which are recorded at the production sites at least once a year and externally verified by TÜV (Technical Control Board). The verification is based on the requirements of the EMAS Regulation [Q EMAS: Glossary, page 272](#) and includes a detailed data check as well as site visits.

The main standards for our production processes are outlined in the permits issued by the governmental authorities. The baseline includes European regulations on immissions, emissions, water, waste and disruptions, as well as their implementation in national law, plus the European chemical regulation REACH [Q Glossary, page 274](#).

We go beyond the fulfillment of legal requirements and reduce our environmental impact by relying on new, innovative environmental protection techniques. We also monitor and improve our environmental performance by means of environment management systems pursuant to ISO 14001 [Q Glossary, page 273](#) (certification of the productions sites not yet certified completed in September 2022) and/or EMAS [Q Certifications by site, page 106](#). They assist us in recognizing potential improvements and, in the case of deviations from specified targets, in initiating corrective actions.

To ensure the continuous improvement of environmental performance in the area of water, for example, there is a Water Management Roundtable in which Corporate Environmental Protection works with the sites and, with the help of an external consultant, identifies potential improvements related to water. Measures to reuse or recycle water have been implemented at all sites — where possible — in order to reduce the input of fresh water and the volume of wastewater.

We also commission an external auditor to carry out extensive environmental risk assessments at each smelter site every year. We regularly analyze and evaluate the environmental risks for all production sites in the Group as part of our risk management. We then develop and define measures to address the identified risks.

In 2021, we expanded these risk analyses in the areas of biodiversity, nature conservation, and water availability, and we carried out special flood risk inspections [Q Energy and climate, page 84](#), [Q Risk and Opportunity Report, page 168](#). The risk analyses revealed that our business operations do not have a material impact on the environmental aspects mentioned above.

As part of our participation in CDP Water Security, we did not identify any relevant impacts for our sites in the areas defined by the World Resources Institute (WRI) Aqueduct as “water stress areas,” neither in terms of water availability nor water quality. As part of the risk assessments, we also systematically analyzed whether the risks identified at the sites were associated with individual opportunities as well.

We keep our employees up to date on environmental and energy-related topics and provide appropriate training on the site-specific environmental issues. Moreover, disruption and emergency drills are carried out generally every year, which we document and evaluate. At the individual sites, we have emergency, alarm and hazard prevention plans in place to prevent environmental impacts and to protect our workforce and the surrounding population.

Our RDE project (Reducing Diffuse Emissions), which was commissioned in October 2021, was a milestone for environmentally friendly and innovative primary copper production [Q Glossary, page 273](#) at the Hamburg plant. Aurubis invested in the project for measures to continue reducing emissions in the primary smelter. These measures include optimized source extraction, a newly installed procedure for processing intermediates, and the use of state-of-the-art suctioning and filter technology to trap residual dust emissions. Following the initial operation phase, we discovered that the filter efficiency of more than 99% fully met our ambitious expectations. The emission-related effectiveness will be assessed over the coming years.

When it comes to processing recycling materials and other raw materials, waste management is one of the central pillars of industrial environmental protection. One special feature of the circular business model is that process residues are further utilized internally in metallurgical processes to the greatest extent possible and thus directly recycled. Processed raw materials and intermediate products are fed back into the economic cycle as completely as possible, and we recycle or properly dispose of unavoidable waste [Q Recycling solutions, page 92](#).

In the year under review, we again carried out a life cycle assessment [Q Glossary, page 273](#) with external support to evaluate the environmental impact of Aurubis copper cathodes. We switched to the Environmental Footprint 3.0 methodology, which has become the current recognized reporting standard. The result shows our environmental footprint continues to be well below the average for copper cathodes worldwide reported by the International Copper Association (ICA). This is due to the high input of recycling material [Q Glossary, page 274](#), reduced greenhouse gas emissions, high energy efficiency, and the comprehensive use of renewable energies in production, to name a few examples.<sup>1</sup>

We also conducted life cycle assessments for the Aurubis products gold, silver, tin and our shapes and wire products, as well as for oxygen-free wire (Foxrod) for the first time, using the environmental footprint methodology. The shapes and wire products represent the next step in the value chain after copper cathodes. The life cycle assessments were published in October 2023 [www.aurubis.com/en/responsibility/environment-energy-and-climate/ecological-footprint-of-our-products](https://www.aurubis.com/en/responsibility/environment-energy-and-climate/ecological-footprint-of-our-products).

Since fiscal year 2021/22, our new specific reduction targets, i.e., those related to production volume, and the associated reporting of specific emissions, have no longer been based on copper output, but rather on a multimetal indicator — the copper equivalent. By revising our environmental sustainability targets in this way, we are reflecting the Group’s transition from a copper to a multimetal producer.

<sup>1</sup> A methodology other than the life cycle analysis was used to calculate the emission values for Scope 1 to 3 in the [Q Energy and Climate chapter, page 84](#). As such, the results of the two approaches to the CO<sub>2</sub> emissions are not comparable.

## Key figures

### Specific dust emissions<sup>1</sup> — 2030 targets

| in g/t multimetal copper equivalent   | FY 2022/23 <sup>3</sup> | 2022 | 2021 | 2020 |
|---------------------------------------|-------------------------|------|------|------|
| Dust emissions                        | 40                      | 40   | 42   | 52   |
| Metal emissions to water <sup>2</sup> | 0.7                     | 0.7  | 0.8  | 0.7  |

### Specific dust emissions<sup>1</sup> — 2022/23 milestones

| in g/t copper output                  | FY 2022/23 <sup>3</sup> | 2022 | 2021 | 2020 |
|---------------------------------------|-------------------------|------|------|------|
| Dust emissions                        | 41                      | 41   | 46   | 56   |
| Metal emissions to water <sup>2</sup> | 0.8                     | 0.8  | 0.9  | 0.8  |

<sup>1</sup> The Aurubis sites in Beerse and Berango have been included in the assessment of specific emissions based on copper production since their acquisition in 2020. With the changeover to and targeting based on copper equivalent, the Aurubis sites in Beerse and Berango have been included in the representations since 2018.

<sup>2</sup> In this table, we refer to the copper production sites that discharge directly into water. In Lünen (Germany) and Berango (Spain), wastewater is directed to the public sewer system after being treated on the plant premises and therefore isn't included.

<sup>3</sup> The environmental figures for FY 2022/23 were estimated based on data for the 2022 calendar year. Cathode output for the Aurubis Group was therefore applied as a conversion mean (calendar year 2022: 1,112,896 t, FY 2022/23: 1,108,622 t). The environmental key figures relating to the calendar year are the standard for us, however, as these comply with the other legal requirements for determining environmental key figures. The figures presented for FY 2022/23 are reliable, but may differ from the actual figures, as some influences can only be determined after the end of the year.

## RECYCLING SOLUTIONS

### Recycling solutions

#### Ambition

We offer comprehensive value chain solutions for the circular economy.

#### 2030 targets

» 50 % average recycled content in copper cathodes

We are using our many years of expertise in processing complex recycling materials, along with state-of-the-art smelter technology, to establish and expand scalable capacities. With our multimetal recycling, we are making an important contribution to the modern circular economy, promoting the efficient and environmentally friendly use of valuable resources, and contributing to raw material security. Additionally, any metal that can be recycled reduces the negative impacts associated with mining and processing raw metals by shortening transportation routes, for example, and lowering the consumption of commodities like water.

The average recycled copper content in our copper cathodes was 44% across the Group (fiscal year 2022/23). In the coming years, we plan to further increase both the volume and complexity of the recycling proportion.

In addition to the processing of copper concentrates, the recycling of copper scrap and complex recycling raw materials, such as computer circuit boards, is a key business area at Aurubis. Non-ferrous metals like copper can be recycled as often as desired without a loss of quality. Furthermore, complex recycling raw materials contain not only copper, but a number of other accompanying elements that can also be recovered, such as gold, silver, nickel, tin, lead and zinc. Our integrated smelter network enables us to process a broad range of materials — from industrial waste that accumulates directly from our or our customers' production to complex materials from end-of-life products. From these materials, we produce metals that can be directly used in new products.



Complex recycling raw materials include industrial residues, slimes and shredder materials, as well as recycling materials and waste containing copper, precious metals, and lead. We also consider end-of-life materials from electronic devices, vehicles and other everyday items to be complex recycling raw materials. These consist of increasingly complex material combinations that include plastics, ceramic or glass. Separating them into single-variety material and product streams for reuse is a significant challenge for the entire recycling sector. For this purpose, we leverage our multimetal expertise to utilize highly developed mechanical and metallurgical separating and refining processes in different combinations, work on new technologies for optimal metal recovery, and invest in state-of-the-art equipment.

The Commercial division is tasked with sourcing recycling materials for the individual plants, among other duties. It is divided into departments such as Recycling Raw Materials (which handles the supply of recycling raw materials for the smelters) and Metal Management (which supplies the production facilities with cathodes and “direct melt” raw materials), which includes the Customer Scrap Solutions function (which supplies the smelters and production facilities with production waste from our copper product customers). This organizational structure aligns with our recycling approach: We use secondary materials from production and from end-of-life products as raw materials and view this as a closed loop.

Closing the loop is only possible if metals are returned after use, which is why we consider how metals can be returned in customer relationships and product marketing as well. The production units provide individualized solutions for taking back the recycling materials that accumulate from the processing of copper products and other metals. This takes place along the different value-added stages of our product customers and their customers. This entire process provides customers with a range of options, such as selling production residues or copper scrap to Aurubis and receiving refined copper in return. Thanks to our integrated smelter network, we can identify solutions for metallurgical challenges as well, so we can serve customers from a wide variety of sectors. As part of our closing-the-loop activities, we have

established targeted product distribution partnerships through which we not only sell our products, but also take back accumulated recycling raw materials, in addition to other services. This is how the raw material cycle comes full circle.

Aurubis processes recycling materials at different sites. These include the sites in Lünen (Germany), Olen and Beerse (both in Belgium), Berango (Spain), and the new Aurubis Richmond site (US). Site managers report to the Chief Operations Officer of Multimetal Recycling (COO-MMR), a role that has strengthened the focus on recycling business since January 1, 2023. Recycling raw materials are the only feedstock at our largest recycling plant, the recycling site in Lünen. The mechanical processing facility for end-of-life electrical and electronic equipment and components at the Lünen site are certified in accordance with the German EfbV ordinance (disposal by waste management companies) and through WEEELABEX in accordance with the European series of standards EN 50625 [Q Certifications by site, page 106](#). The latter certificate confirms that waste electrical and electronic devices are efficiently treated and disposed of, while minimizing environmental impacts and emissions of harmful substances at the same time. The Beerse and Berango sites process complex recycling materials to recover not only copper, but also tin, lead, and metal intermediates, such as nickel sulfate solution and zinc oxide.

Aurubis also holds a 40% stake in the cable dismantling specialist Cablo GmbH — a joint venture with the recycling company TSR Recycling GmbH & Co. KG that the former Aurubis subsidiary CABLO joined. The goal of the joint venture is to efficiently recover copper granules and plastics, thus strengthening the circular economy.

The Hamburg and Pirdop sites also process recycling raw materials. Though the primary smelters utilize copper concentrates as their main feed material, they also use copper scrap to a certain extent because it is useful for process cooling and therefore enables particularly energy-efficient processing. With the investment in the construction of a new recycling facility at the Beerse (Belgium) site, Aurubis intends to recover metals

such as gold, silver and tin even more quickly and efficiently, and with a higher yield. A newly developed hydrometallurgical process that enhances the valorization of metals makes this possible. The facility, referred to as ASPA (Advanced Sludge Processing by Aurubis), will process anode sludge, an intermediate product of the copper tankhouse, from the recycling sites in Beerse and Lünen. The project highlights synergies with the Beerse site while also strengthening it. Groundbreaking took place on December 15, 2022. The plant is scheduled to be commissioned in fall 2024.

Another project approved in the reporting year was an investment in building a bleed (electrolyte) processing plant at our Olen site in Belgium. In a hydrometallurgical process, valuable metals such as nickel and copper are recovered from electrolyte streams generated in metal production in the tankhouse at the Aurubis Beerse and Olen sites (both in Belgium). The facility comprises a complete tankhouse purification system known as “bleed treatment.” The new plant is expected to go online in fall 2024 as well.

Based on our research and development activities, Aurubis is conducting a technical feasibility study on the recovery of lithium, nickel, manganese and cobalt from the lithium-ion batteries used in electric vehicles to upgrade our recycling capabilities even further. In recent years, Aurubis has been working on developing a new hydrometallurgical process for processing what is known as black mass — the cathode and anode material that is applied to foil in lithium-ion batteries. This will allow the metals to be

recovered and returned to battery production in the future. We are also researching and developing methods for processing the graphite contained in the black mass to make it reusable in lithium-ion batteries. In our pilot plant at the Hamburg site, we are continuously working on testing and improving this process with regard to the recovery rates of the metals and the influence of impurities, among other things. The next step is to start the first commercial activities in battery recycling with a demo plant in 2024. After setting clear criteria, we are now looking for a suitable site in Europe for the commercial plant that could produce on an industrial scale, starting in fiscal year 2026/27.

Additionally, Aurubis is investing in a new secondary smelter specializing in multimetal recycling in Augusta, Georgia (US) as part of achieving our ambitions regarding establishing the circular economy as the long-term driver of economic success. In the future, the plant will process up to 180,000 t of computer circuit boards, copper cable, and other metal-bearing recycling materials into blister copper [Q Glossary, page 272](#). We plan to process a large extent of the intermediate products into various industrial and precious metals at our European smelter sites, and sell a small proportion directly on the US market. The plant will considerably reduce the currently high amount of recycling materials being exported from the US to Asia and Europe. This will shorten transport routes, thus reducing the carbon footprint generated by recycling these materials. Construction started in summer 2022, and commissioning of the first of the two modules is anticipated in the second half of 2024.

## Social matters

### GOVERNANCE AND ETHICS — WORK IN ASSOCIATIONS AND POLITICAL LOBBYING

We view the appropriate and transparent representation of Aurubis' interests with respect to political and social institutions as an important part of responsible corporate governance. We consider ourselves a reliable, factual, transparent discussion partner for governments, political parties, elected representatives, and non-governmental organizations.

Corporate External Affairs serves as the central interface for political and regulatory issues in the Aurubis Group. This division coordinates political measures at a corporate level and represents the company to policymakers. The head of Corporate External Affairs reports directly to the Executive Board chairman. Experts in our specialized divisions and production sites support the work in subject-specific areas. Corporate External Affairs and Corporate Energy & Climate Affairs jointly developed the company's position on the introduction of an industrial electricity price, for example. Aurubis' position was shared and discussed with the corresponding stakeholders.

Aurubis' political lobbying is based on the Corporate External Affairs Policy, which defines the responsibilities, duties and processes. The corporate policy is supplemented by the Corporate Policy on the Management of Associations.

In addition to independent lobbying, Aurubis is an active member of national and international economic, industry and specialist associations. Our goal is to constructively and critically oversee political initiatives together with the other association members and to actively represent our positions in a back-and-forth dialogue with stakeholders from the worlds of business, science and civil society.

Our employees in the Group representative offices in Brussels (Belgium) and Berlin (Germany) serve as contacts for members of the European Commission, the European Parliament, the German Bundestag, the German federal ministries, German federal state representations, and German federal state parliaments and ministries. Moreover, Aurubis maintains a continuous dialogue with local officeholders and interest groups in the areas around our sites via association committees, in public discussion rounds, and in personal conversations, for example. We feel it is crucial to convey the political conditions Aurubis needs to work sustainably and responsibly. All our political communication is transparent and open.

In the year under review, Corporate External Affairs coordinated with the departments on the aim of working towards a political framework that would ensure Aurubis' stable energy supply. As a sponsor of the KlimaWirtschaft foundation [Q Energy and climate, page 84](#) we are also working with the other forward-looking companies involved in the foundation to develop constructive contributions to the discussion and practical recommendations for action for an ambitious and sustainable climate policy.

Our contributions to public consultations, which are accessible on the European Commission's website, are one result of our transparent approach to political lobbying. In the year under review, we provided feedback both directly and through industry associations on the updates to the European Emissions Trading System (EU ETS) and the Air Quality Directive, for example. Furthermore, our positions on individual topics are outlined in factsheets on our homepage [www.aurubis.com](http://www.aurubis.com) and in associations' position papers that are available online.

Aurubis is included in the European Union's Transparency Register [www.ec.europa.eu/transparencyregister](http://www.ec.europa.eu/transparencyregister), which publishes expenditures for lobbying at the European level. Since the passing of the German Lobby Register Act, which we advocated for together with the German Chemical Industry Association (VCI), Aurubis has also been listed on the German Transparency Register at the German Bundestag [www.lobbyregister.bundestag.de](http://www.lobbyregister.bundestag.de). It lists the amounts reported by Aurubis: In fiscal year 2021/22, Aurubis spent € 960,001 to € 970,000 (2020/21: € 920,001 to € 930,000) for the representation of interests in Germany and € 500,000 to 599,999 (2020/21: € 500,000 to 599,999) for the representation of interests in Europe.<sup>1</sup> Aurubis does not donate to any political parties or candidates.

## SOCIAL ENGAGEMENT

### Social engagement

#### Ambition

We are a reliable partner locally and internationally, one that makes a long-term contribution to a livable environment.

#### 2030 targets

- » 90% long-term partners (percentage of total budget)
- » 0.8% of operating EBT (five-year average) as annual budget for social engagement, and at least € 2 million

#### 2022/23 milestone

*Status: achieved*

- » Developing an impact monitoring system to evaluate sponsored projects

Social engagement is an integral part of our company identity. We want to promote enthusiasm for our company and for our work, and be a reliable partner locally and internationally. We have made substantially contributing to a livable environment our goal. Here we focus on action areas that are linked to Aurubis' key skills.

With our "together we care" social engagement strategy, we are concentrating our involvement on the areas of knowledge, the environment, and participation. The strategy bundles our social engagement under the "together we care" slogan nationally and internationally in the areas around our sites, as well as in our supplier countries. Projects and partners are selected according to established criteria outlined in our Corporate Social Engagement Policy, which also defines responsibilities in the Group. To achieve our target of 90% long-term partnerships, we began drawing up a definition for long-term collaborations during the reporting year. We plan to evaluate the impact of the projects we sponsor in the future, and began testing assessment methods in the reporting year. In the coming fiscal year, we will address the development of an impact monitoring system for evaluating sponsored projects in a workshop.

The Event Management & Social Engagement division is responsible for our social engagement and reports to the head of Communications & Investor Relations. The division has a direct reporting line to the Executive Board chairman, meaning the chairman is included in our social activities. The entire Executive Board determines the budget and decides what projects to sponsor. The budget was increased to € 2,648,000 in the reporting year (2021/22: € 2,230,000), which corresponds to the planned 0.8% of the five-year average operating EBT (earnings before taxes). A committee made up of members appointed from Event Management & Social Engagement, Communications, Sustainability, and Corporate Compliance makes decisions about project support that exceeds a specific, internally set level.

<sup>1</sup> Because the annual updates of the German and EU transparency registers must be included with the current annual report, we disclose the figures from the previous year here.

We further expanded the existing international social engagement partnerships in the reporting year. With five projects in South America and one in South Africa, we want to make a social contribution in our supplier countries and in countries where we have business relationships. Our website offers impressions of the projects we sponsor [www.aurubis.com/en/togetherwecare](https://www.aurubis.com/en/togetherwecare).

Aurubis not only supports projects at a Group level. Our sites are also involved at a local level. We want to be a good neighbor at our sites. It is therefore even more important to us that the people living in our neighborhood know what happens on our plant premises, that we are interested in their well-being, and that we will advocate for them. Our site managers seek and maintain an active dialogue with the neighborhoods around our sites, conversations in which we identify where there is a need for our involvement. The same takes place via international partners (i.e., chambers of commerce or local and international non-governmental organizations) and political representations. Here too, we are guided by our social engagement guidelines. We support projects if they involve our three Group-wide focuses — knowledge, the environment, and participation — or promote culture and sports and are related to our core business. To be able to assess the impact of our engagement, we ask qualitative questions about current projects, such as what our funding is used for and in what amounts, and what objectives have been achieved. In addition, our project partners regularly inform us about their current measures and plans. Our objective is to maintain and further expand our engagement in the communities in which we operate.

## Human rights

### GOVERNANCE AND ETHICS — HUMAN RIGHTS AND DECENT WORKING CONDITIONS

Together with other actors in the supply chain, the Aurubis Group's global business activities contribute to employment, training and advancement, as well as sustainably safeguarding prosperity. They also, however, include risks for potentially negative impacts on human rights. Examples include environmental damage, high-risk working conditions, and social conflicts, such as in the mining of primary raw materials or in downstream processing stages.

We respect human rights and advocate for their protection. Here we follow the United Nations Guiding Principles on Business and Human Rights [Q Glossary, page 274](#) in accordance with the “Protect, Respect and Remedy” framework. We understand human rights due diligence as a responsibility shared by all of the participants in the respective value chain. This includes nation states as well as economic actors. Respecting human rights in the supply chain is just as important to us as adhering to the corresponding principles when it comes to our own workforce. So we adopted our Human Rights Policy for Own Business Operations in fiscal year 2022/23. The policy is there to ensure risks from human rights violations are identified and prevented or minimized. Furthermore, the policy is intended to comply with the German Supply Chain Due Diligence Act (LkSG) requirements for risk management in the company's own business operations. The processes and measures for protecting human rights in the supply chain are set out in the Corporate Responsible Sourcing Policy.

Respect for human rights is reflected in our company values and is included in our Code of Conduct. In it, we commit to rejecting all forms of discrimination and handling 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 peoples. We are committed to the principle of codetermination in the company and place a high priority on good communication between our employees and the company

management. Compliance with the internationally recognized core labor standards of the International Labour Organization (ILO) [Q Glossary, page 273](#) is of fundamental importance. Labor law provisions, applicable labor standards, and laws regarding compensation and working hours, as well as our employees' general workers' rights, are also self-evident guiding principles that govern how we interact with our workforce.

In accordance with the requirement of the LkSG, the role of a human rights commissioner is fulfilled by two committees: The Human Rights Committee is responsible for own business, while the Supply Chain Committee is responsible for the supply chain. The Sustainability division is represented on both committees and serves as an interface here.

The Aurubis Human Rights Commitment summarizes Aurubis' understanding of its due diligence obligation regarding human rights, as well as the key elements of this obligation. It is aimed at all employees, business partners, and other partners of the Aurubis Group. The Aurubis Business Partner Code of Conduct, on the other hand, specifically applies to business partners [www.aurubis.com/en/responsibility/people/human-rights-and-labor-standards](http://www.aurubis.com/en/responsibility/people/human-rights-and-labor-standards).

We have participated in the United Nations Global Compact (UNGC) since 2014 and are committed to implementing its Ten Principles related to human rights, labor, the environment, and anti-corruption. We are committed to the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidelines in order to promote responsible supply chains. Every year, we report our progress on implementing the Ten Principles to the UNGC.

The Executive Board and the local managing directors are primarily responsible for upholding human rights in our business

activities. The Code of Conduct requires that all Aurubis employees fundamentally respect human rights in their daily work and in all their business decisions. Supervisors serve as role models in this regard. Our target in the fiscal year was to heighten awareness of and empower people to take action regarding human rights due diligence. This is why we launched a Group-wide training concept on human rights and anti-discrimination, "Together with Respect," in the reporting year. We offer separate digital training formats for administrative employees and for workers in production. Additionally, we conducted training that focused on human rights in the supply chain for the Commercial and Corporate Procurement areas.

We started a systematic human rights gap and risk analysis for some of our sites in the fiscal year. The results will provide further guidance on possible additional measures for the Group's business areas.

We call on all employees and business partners to report any justified suspicion of discrimination or other human rights violations via our Compliance Portal, the whistleblower hotline [Q Anti-corruption, page 103](#) [www.aurubis.com/whistleblower-hotline](http://www.aurubis.com/whistleblower-hotline). Every report is investigated.

As part of the Copper Mark certification process at our sites in Hamburg, Lünen (both in Germany), Olen (Belgium), and Pirdop (Bulgaria) [Q Certifications by site, page 106](#), our approach to human rights and labor and social standards was audited and assured in accordance with the Copper Mark criteria. The plant-specific audits sometimes generate suggestions and plans for improvement that Aurubis AG has taken as inspiration and guidance in increasing performance regarding the 32 Copper Mark sustainability criteria. The sites in Beerse and Stolberg committed to the Copper Mark and started the certification process in the reporting year.

## RESPONSIBLE SUPPLY CHAIN

### Responsible supply chain

#### Ambition

We minimize negative impacts on people and the environment in our supply chains.

#### 2030 targets

- » The improvement plan implemented considerably reduced the risk with all suppliers assessed as high risk.

#### 2022/23 milestones

*Status: achieved*

- » Human rights, environmental protection, and safety clauses<sup>1</sup> in 100 % of long-term contracts for primary raw materials
- » Continued rollout of the Aurubis Business Partner Screening
- » Copper Mark certification of four sites

We take responsibility for social issues and sustainability standards, and not just in our own production processes and in our own actions, but in our supply chain as well. This is all the more important because we source raw materials from around the world for our business. The countries of origin for the materials include regions that could pose risks regarding compliance with sustainability standards.

The extraction of the resources we process can have a direct or indirect impact on social and environmental aspects. The extraction processes used by our suppliers and their production activities can, for example, have an impact on biodiversity and the climate, and on maintaining air, water and soil quality. Other environmental issues are also relevant, such as the handling of slag and the use of energy and water. Social aspects, such as compliance with labor and social standards, and the issue of health and occupational safety at our suppliers, are also taken into consideration. All these aspects also harbor the potential for human rights violations. As part of our 2030 strategy, we have therefore set a milestone for 2022/23 to ensure that contractual safeguards for human rights, environmental protection, and

security clauses are included in all long-term<sup>2</sup> primary raw material contracts. To achieve our milestone, we added binding documents (e.g., separate pledge to uphold the Aurubis Code of Conduct for Business Partners) to the clauses for our suppliers to supplement contracts that have already been concluded. In fiscal year 2022/23, the percentage of long-term contracts with primary raw material suppliers that included contractual clauses to safeguard human rights, environmental protection, and safety or equivalent supplementary documents was 100 % (previous year: 95 %<sup>3</sup>). As such, the 2022/23 milestone has been achieved.

In the past fiscal year, we adjusted our “No suppliers with a very high risk” 2030 target in order to express our responsibility in the supply chain more precisely. This adjustment was disclosed in the 2023 Sustainability Report. The rephrased 2030 target now reads: “The improvement plan implemented considerably reduced the risk with all suppliers assessed as high<sup>4</sup> risk.” This meets our requirements more effectively. Continuous improvement is an integral part of our business practices in our own business area, as evidenced by independent certificates from the Copper Mark. We want to share the high standards we set for ourselves with our suppliers in keeping with the “stay and improve” approach. The newly formulated goal clearly communicates our collaborative approach to our processes. We aim to work with our suppliers to design and implement improvement plans based on the specific risks identified for each case, and which are intended to have a lasting impact. We believe this is the only way we can do our part to improve sustainability performance in the industry.

We have set the target of managing our supply chains responsibly. In the fiscal year, we further developed our governance structures and processes in line with our responsible supply chain management target. The Corporate Responsible Sourcing Policy (RSP) entered into force, replacing the Business Partner Screening policy. The entire Executive Board is responsible for the ongoing implementation of the RSP. The Executive Board appoints the Supply Chain Committee (SCC) to accomplish this task. The SCC serves as a human rights officer within the meaning of the German Supply Chain Due Diligence Act (LkSG) in the Group's supply chain, among other responsibilities. The SCC's mandate for the Aurubis Group's supply chain is defined in the Aurubis

<sup>1</sup> Reference is made to occupational safety standards pursuant to UN conventions.

<sup>2</sup> Contracts with a 5-year or longer term.

<sup>3</sup> The figure disclosed in last year's NFR of 81% referred to all contracts. We have modified the information to include all long-term contracts in line with the milestone.

<sup>4</sup> The term “very high risk” was stated more precisely as “high risk” since no differentiation is made between high and very high risk in international best practice.

Corporate Responsible Sourcing Policy. The SCC comprises senior management from the Commercial, Corporate Procurement, Corporate Energy & Climate Affairs, Corporate Sustainability, Compliance, Corporate Environmental Protection, and Health & Safety divisions. The RSP also summarizes the Group-wide procurement guidelines and applies to all Group companies in which Aurubis AG directly or indirectly holds the majority of shares.

#### BUSINESS PARTNER & SUPPLY CHAIN SCREENING — PROCESS DESCRIPTION

The Corporate Responsible Sourcing Policy defines a unified, risk-oriented process for assessing the identity and integrity of suppliers and the supply chain, the Business Partner & Supply Chain Screening (BPS). This screening process is based on internationally established guidelines and legal regulations.<sup>1</sup> The following process description defines the process as it will be applied once the RSP has been fully implemented. In the coming fiscal years, it will be successively implemented according to a risk-based approach for all business partners. In fiscal year 2022/23, the process was applied to business partners that had already undergone screening, but has not been implemented for all business partners. The exact stage of implementation is described below.

The purchasing units, more precisely Commercial and Corporate Procurement, are responsible for implementing the BPS process, and were joined by Energy & Climate Affairs in September 2023.

The screening process is based on the German Federal Office for Economic Affairs and Export Control's (BAFA) guidelines and is divided into an abstract or overarching, and a concrete risk analysis referred to respectively as the risk assessment and the control assessment in the Aurubis process description.

This overarching risk analysis considers country risks and sector or material-specific risks with regard to potential human rights violations. The overarching risk analysis is to be updated regularly and adapted in line with our business activities where applicable. In the BPS, the control assessment refers to the individual assessment of business partners.

The process description from the RSP stipulates that every potential new business partner is to be included in the IT-supported screening tool (Business Partner Screening). The risk assessment is used to determine the level of detail used to carry out the screening, in this case the control assessment. If the risk assessment classifies a business partner as an initial medium or high risk, the BPS process provides for a more detailed screening, i.e., a more specific risk appraisal for that business partner compared to one for a lower-risk partner. This detailed screening consists of a questionnaire on sustainability criteria and a request for a screening report from an external service provider that covers compliance, finance and ESG aspects.

The Compliance and Sustainability Group divisions are involved in the detailed screening (control assessment) for business partners assessed as medium and high risk. It focuses on respect for human rights, anti-corruption, working conditions, occupational safety, environmental protection, and the OECD Due Diligence Guidance for Responsible Supply Chains and Certification by Third Parties. The aim is to evaluate the processes and management systems the supplier uses to reduce the relevant risks. The results from external data sources are also evaluated in order to identify potential risks (e.g., sanctions, human rights or government-related incidents, compliance, financial stability) related to the respective suppliers.

<sup>1</sup> The five-stage OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk-Areas, the Copper Mark's Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc, EU Regulation 2017/821 on Conflict Minerals, the LBMA Responsible Gold and Silver Guidance, the Responsible Minerals Assurance Process (RMAP) for tin and tantalum, and the German Supply Chain Due Diligence Act.



If the detailed screening identifies potential risks or concrete violations of human rights, then measures are drafted to increase the degree of information on the potential risks, improve the supplier's sustainability performance, or reduce the concrete risks. The Sustainability and Compliance divisions devise the measures and the purchasing units submit them to the suppliers. These measures focus primarily on preventing and remedying identified risks. This process is incorporated into our communication with the screened supplier. If the division conducting the review deems it necessary, then additional information on the facts of the case is exchanged. This information exchange can take the form of a statement from the supplier about the situation on site, an agreement on an improvement plan, a local stakeholder dialogue, an on-site inspection carried out by Aurubis employees, or an independent assessment. If a supplier is unable or unwilling to implement the measures we prescribe within the set time limit, then the business relationship is either not pursued any further or terminated. In the next step of the BPS process, the results of the review are submitted for approval and the respective supplier is either approved or rejected as an Aurubis business partner, or cooperation is either continued or terminated with an existing partner.

#### DEGREE OF IMPLEMENTATION OF THE BPS IN FISCAL YEAR 2022/23

In fiscal year 2022/23, a new IT tool for screening was implemented, replacing the tool that had been in use since fiscal year 2014/15. The responsible employees in the Commercial division underwent training to prepare them for the new system. Our goal is to migrate all business partners to the new IT tool and apply the screening process in the coming years.

In fiscal year 2022/23, we worked with external support to develop an overarching or abstract risk analysis in accordance with the LkSG. Customers were not included in the risk analysis for this fiscal year.

Based on this risk analysis, our focus within the scope of the BPS is on those raw material suppliers that fall into the "high-risk supplier" category. This includes both direct and indirect suppliers in the primary raw materials area.

In the spirit of continuous improvement, we plan to further expand and more broadly implement our processes in the 2023/24 fiscal year. The focus will be on the procurement of goods and services, in addition to the purchase of raw materials. Based on our risk inventory for the past fiscal year, the improvement plans mentioned in the defined target will be structured and defined for the first time. The measures that have already been drafted will serve as the foundation here, and our IT solution will need to be advanced further.

The tool will be used to track risk profiles in our business partner base in the coming fiscal year. The focus here is on reducing the risk of those suppliers with specifically identified risks and, as such, on the impact of the improvement plans mentioned in the defined target.

We will comply with our reporting obligation to fulfill our due diligence in accordance with Section 10 of the Supply Chain Due Diligence Act (LkSG) on our website in due time. The report to the Federal Office of Economics and Export Control (BAFA) will contain more detailed information on the risks identified, their assessment, and the measures taken.

#### INCIDENTS AND DEVELOPMENT

The current findings, financial implications, and activities of the company's management in connection with the criminal acts directed against Aurubis are explained in the Economic Report in the Economic development within the Aurubis Group [Q Economic Development within the Aurubis Group, page 141](#) section.

Any incidents with potential relevance to the LkSG will be included in the fact-specific reporting to the BAFA in January 2024.

## EXTERNAL AUDITS

Since 2013, Aurubis' gold production has been annually certified as conflict-free according to the standards of the London Bullion Market Association (LBMA) [Q Glossary, page 273](#). This certificate verifies that we carry out our due diligence processes in accordance with the OECD standards. This certification option has been available for silver since 2019, and Aurubis' silver production has been certified as conflict-free since then, as well. Tin production at our Beerse and Berango sites has been certified as conflict-free in accordance with the Responsible Minerals Assurance Process Standard (RMAP) [Q Glossary, page 274](#) and the Responsible Minerals Initiative (RMI) [Q Glossary, page 274](#) without interruption since 2015. This standard is also based on the OECD standard for conflict minerals [Q Glossary, page 272](#).

The regulatory audit of the German and Bulgarian sites for compliance with the due diligence requirements in accordance with the EU Conflict Minerals Regulation began in the reporting year. The assessment has already been completed for the Hamburg site. This legislation makes due diligence and auditing obligations along the supply chain binding for EU importers of tin, tantalum, tungsten, and their ores, as well as gold. The screening process is already part of this audit.

We are part of the sector solution "The Copper Mark," an independent body that externally certifies our sustainability performance. The Copper Mark initiative reviews the sustainability standards at copper production sites, including mines, smelters and refineries, among other things. This allows us to document our performance and receive suggestions for continuous improvements, which we follow up with concrete actions plans. The Copper Mark covers the 32 sustainability criteria set out in the Responsible Minerals Initiative's (RMI) Risk Readiness Assessment and incorporates topics such as compliance, child labor, and occupational safety. It is also aligned with the United Nations Sustainable Development Goals (SDGs) [Q Glossary, page 274](#).

Since July 2023, over 25% of the copper produced worldwide has come from sites that have been awarded the Copper Mark seal. The Aurubis plants in Hamburg, Lünen, Pirdop and Olen were audited in line with the Copper Mark due diligence standard for the responsible procurement of copper, lead, nickel and zinc during the reporting year and were given the "fully meets" designation. The sites in Beerse and Stolberg committed to the Copper Mark and started the certification process in the reporting year.

In February 2023, Aurubis was one of the first companies in the world to commit to the new Copper Mark Chain of Custody Standard. This standard defines the requirements for certified copper-containing products in the supply chain and is the first standard to cover the entire supply chain. The Copper Mark published the standard, a more detailed version of the previous guidelines, at the beginning of 2022. It also helps fulfill the standards of the London Metal Exchange (LME) [www.lme.com](https://www.lme.com). This standard is currently being reviewed by the OECD for conformity with its due diligence requirements, which is a prerequisite for recognition by the LME.

## GRIEVANCE PORTAL

We expect our suppliers to report substantiated suspicions of human rights violations, for example using our Compliance Portal, the whistleblower hotline [Q Anti-corruption, page 103](#). Complaints about sites that are taking part in the Copper Mark process can also be submitted through the Copper Mark's grievance mechanism <https://secure.ethicspoint.eu/domain/media/en/gui/107757/index.html> and through [www.aurubis.com/en/responsibility/whistleblower-hotline](https://www.aurubis.com/en/responsibility/whistleblower-hotline).

## Anti-corruption

### GOVERNANCE AND ETHICS — CORRUPTION AND ANTI-COMPETITIVE BEHAVIOR

Combating corruption and anti-competitive behavior in the course of our business activities is a key aspect of our corporate responsibility and one of the central focuses of our compliance activities. Corruption and anti-competitive behavior not only cause material damages; they also undermine fair, free competition.

Anti-corruption measures are established in our compliance management. To us, compliance means that we follow the laws and align our actions with ethical principles, our values, and company policies. Our clear objective here is to comply with all legal and company guidelines and policies. A potential violation of the law can have serious consequences — for our employees, for Aurubis as a group, and for business partners of Aurubis AG entities.

The Group Chief Compliance Officer is the central contact person for all compliance-relevant issues and reports directly to the entire Executive Board. Local compliance officers are also available as contacts for employees at the individual Group sites. Together with the Executive Board, our compliance employees promote a compliance culture and actively strive to strengthen awareness for following rules and laws in the Group.

Compliance management establishes the main principles relevant for compliance, develops the corresponding compliance organization, and identifies, analyzes and communicates significant Aurubis guidelines and commitments. Our compliance program introduces principles and measures to limit risks and prevent violations. The Chief Compliance Officer reports quarterly and as circumstances may require to the Executive Board and Audit Committee of the Supervisory Board with regard to the compliance management system, compliance violations, and compliance-related measures. The CCO works closely with

the employees responsible for risk management and with Internal Audit. As part of our internal control system, the Chief Compliance Officer reviews potential compliance risks together with the Executive Board, the plant managers, and the heads of corporate and central functions. The corruption risks at our sites are thus also identified and documented in risk management during compliance management. Internal Audit reviews the fulfillment of the overarching legal conditions and internal policies (such as the Anti-Corruption Policy) in the company's business dealings.

The compliance measures include prevention, monitoring and sanctions. Preventative measures at Aurubis comprise the risk analyses previously mentioned, internal policies, guidance and especially training for our employees. Our policies and training documents are updated, and new findings are incorporated every three years at the least. Our Corporate Anti-Corruption Compliance Policy and our Code of Conduct for employees are at the core of our anti-corruption efforts. The Executive Board members and all management staff also undergo training on anti-corruption and antitrust law every three years as a rule. Group-wide, our full-time and part-time employees also complete training, in so far as these topics impact their area of work. To track the effectiveness of our training measures, participants are required to take a test once they have completed training.

The current findings, financial implications, and activities of company management in connection with the criminal acts directed against Aurubis are detailed in the Economic Report in the [Q Economic Development within the Aurubis Group, page 141](#) section. Should the investigative process generate any findings relevant to anti-corruption or bribery, they will be considered in the future development of the compliance management system and incorporated into its continual improvement.

Employees, business partners, and other third parties can confidentially and anonymously report legal violations and breaches of our Code of Conduct via our Compliance Portal,

the whistleblower hotline [www.aurubis.com/en/responsibility/whistleblower-hotline](https://www.aurubis.com/en/responsibility/whistleblower-hotline). The Corporate Compliance Policy and the policy available on our homepage state that there are no disadvantages to a whistleblower for making a report. This can be done confidentially and anonymously, if desired. The whistleblower hotline is available in all Group languages and is also open to all external stakeholders. It is operated by external, independent attorneys. Any tips they receive regarding possible cases of corruption, discrimination or incidents in the supply chain, for instance, are consistently investigated. If a case of wrongdoing is confirmed, this results in a warning, dismissal and/or claims for damages.

### Key figures

#### Compliance and anti-corruption: Employees trained in the past three years

| Number of employees | 2020/21 – 2022/23 |
|---------------------|-------------------|
| Anti-corruption     | 1,561             |
| Antitrust law       | 612               |

## Additional key aspects

### IT SECURITY

The key objective of the IT security measures taken at Aurubis is to meet the increased need for protection due to the rising threat potential for cyberattacks worldwide. Responsibility for IT security lies with Corporate IT, which reports to the Chief Financial Officer. This does not apply to the production facility IT networks (Operations Technology, OT), which are separate from the Group-wide IT network. The respective plants are responsible for these separate IT networks. They receive support from Corporate IT in implementing security measures for the production facility IT networks. The IT Security Officer also serves in an advisory capacity, and the plants report to both Chief Production Officers.

Some subsidiaries operate their own IT systems, which the respective subsidiary's IT department is responsible for. Aside from Corporate IT, those responsible for the production facility IT networks, and the IT departments of subsidiaries, no other entities or individuals in the Aurubis Group are authorized to maintain, set up, or modify IT infrastructures.

The Information Security management team informs the entire Executive Board about all cybersecurity issues every two months.

Aurubis' IT Security Fundamentals — General Guidelines for Using Information Systems policy comprises responsibilities and regulations that relate to the use of information systems, passwords, the email system, the internet, and mobile devices. Since the end of September 2022, this has been supplemented by the Aurubis AG Corporate Information Security Policy, which strategically classifies information security. The Corporate Policy on IT Security that applies to the security of the production facility IT networks was revised in the current fiscal year and will go into force in the 2023/24 fiscal year.

Aurubis conducts quarterly safety checks and risk analyses for its IT security systems and information assets in accordance with the Risk Management Policy. Established response plans go into effect in the case of unauthorized data leaks or third-party access. A phishing test is carried out around twice a year, for example. The results are incorporated into training units.

In 2021, an IT Security Officer was added to expand IT Security. The IT Security Officer is primarily responsible for building an information security management system (ISMS) that complies with the international ISO/IEC 27001 standard. The ISMS concept developed in the last reporting year was finalized in this reporting year and externally audited and certified by TÜV (Technical Control Board). Focal points include technical security precautions, such as firewalls and network security, the planning and implementation of security checks by third parties, and support for upcoming improvement measures. Organizational precautions, such as processes and workflow, and work instructions, are also essential to the ISMS. The IT Security Officer can contact the Aurubis Executive Board at any time to share any concerns.

New reporting channels were established in the company to ensure that security incidents could be detected and handled more efficiently in the fiscal year. Any employee can contact the Aurubis IT Security Officer any time by phone, chat or email. A

due diligence program for IT security is also in use: Third-party checks, such as of new software-as-service providers and IT service providers, are carried out using a standardized checklist and approval is documented.

Despite all the security measures in place at the time, however, there was a serious cyberattack on all the Aurubis Group IT systems in the early hours of October 28, 2022. Although this was a serious attack and almost all systems had to be preventively shut down, the negative impact was limited. This underlines the effectiveness of our measures.

In response to this attack, we have invested in additional security technologies, reviewed and, where necessary, adjusted cybersecurity processes, in addition to third-party audits and assessments of the Group's cybersecurity several times a year. We use the results of these assessments to improve our measures.

In the reporting year, an external service provider audited the security of the IT networks at the production plants at the Hamburg, Pirdop, Olen, Beerse, Berango and Lünen sites and submitted recommendations. These were subsequently prioritized. An implementation plan is currently being drawn up in cooperation with the sites.

## Certifications

The following table provides an overview of the ESG-relevant certifications of all our production sites.

### Certifications by site

| Site  | The Copper Mark | EMAS | ISO 14001 | ISO 50001 | ISO 9001       | IATF 16949 | EfbV | ISO 45001 | ISO 27001 |
|---|-----------------|------|-----------|-----------|----------------|------------|------|-----------|-----------|
| <b>Production sites</b>                               |                 |      |           |           |                |            |      |           |           |
| Hamburg, headquarters (DE)                            | ✓               | ✓    | ✓         | ✓         | ✓              |            |      | ✓         | ✓         |
| Lünen (DE) <sup>1</sup>                               | ✓               | ✓    | ✓         | ✓         | ✓              |            | ✓    | ✓         | ✓         |
| Olen (BE)   | ✓               |      | ✓         | ✓         | ✓              |            |      | ✓         | ✓         |
| Pirdop (BG)   | ✓               |      | ✓         | ✓         | ✓              |            |      | ✓         | ✓         |
| Avellino (IT)   |                 | ✓    | ✓         | ✓         | ✓              |            |      | ✓         | ✓         |
| Beerse (BE)   |                 |      | ✓         | ✓         | ✓              |            |      | ✓         | ✓         |
| Berango (ES)  |                 |      | ✓         | ✓         | ✓              |            |      | ✓         | ✓         |
| Buffalo (US)  |                 |      | ✓         | ✓         | ✓              | ✓          |      | ✓         | ✓         |
| Emmerich, Deutsche Giessdraht (DE)                    |                 |      | ✓         | ✓         | ✓              |            |      | ✓         | ✓         |
| Hamburg, E.R.N. (DE)                                  |                 |      | ✓         | ✓         | ✓              |            | ✓    | ✓         |           |
| Hamburg, Peute Baustoff (DE)                          |                 |      | ✓         | ✓         | ✓ <sup>2</sup> |            |      | ✓         | ✓         |
| Pori (FI)   |                 |      | ✓         | ✓         | ✓              |            |      | ✓         | ✓         |
| Röthenbach, RETORTE (DE)                              |                 |      | ✓         | ✓         | ✓              |            |      | ✓         | ✓         |
| Stolberg (DE)   |                 |      | ✓         | ✓         | ✓              | ✓          |      | ✓         | ✓         |
| Stolberg, Schwermetall Halbzeugwerk (DE) <sup>3</sup> |                 | ✓    | ✓         | ✓         | ✓              |            |      | ✓         |           |

<sup>1</sup> The plant is also certified through WEEELABEX in accordance with the European series of standards EN 50625. The certificate confirms that waste electrical and electronic devices are efficiently treated and disposed of while minimizing environmental impact.

<sup>2</sup> For the sale of iron silicate granules used to produce blasting abrasives.

<sup>3</sup> Not majority owned by Aurubis (50 % stake).

#### Explanation:

EMAS: system of specifications for environmental management systems and environmental audits

ISO 14001: standard for environmental management systems

ISO 50001: standard for energy management systems

ISO 9001: standard for quality management systems

IATF 16949: standard for quality management systems in the automotive industry, based on ISO 9001

EfbV: Ordinance on Specialized Waste Management Companies (German certificate)

ISO 45001: standard for occupational safety management systems

ISO 27001: standard outlining requirements for information security management systems

### Taxonomy-aligned turnover counter

| Economic activities<br>in € thousand    | Quantitative breakdown |  |                         |                | Percentage<br>internal use |
|---|------------------------|--|-------------------------|----------------|----------------------------|
|   | Absolute turnover      | Turnover from<br>contracts with<br>customers | Turnover from<br>leases | Other turnover |                            |
| <b>Only taxonomy-aligned activities</b> | <b>0<sup>1</sup></b>   | <b>0</b>                                     | <b>0</b>                | <b>0</b>       | <b>0</b>                   |

<sup>1</sup> There is no taxonomy-aligned turnover in the 2022/23 fiscal year.

### Taxonomy-aligned OpEx counter

| Economic activities<br>in € thousand    | Quantitative breakdown |                  |                   |          |
|---|------------------------|------------------|-------------------|----------|
|   | Absolute OpEx          | R&D expenditures | Short-term leases | Other    |
| <b>Only taxonomy-aligned activities</b> | <b>0<sup>1</sup></b>   | <b>0</b>         | <b>0</b>          | <b>0</b> |

<sup>1</sup> There is no taxonomy-aligned OpEx in the 2022/23 fiscal year.

## Taxonomy-aligned CapEx counter

| Economic activities<br>in € thousand   | Quantitative breakdown |   |   |   |               |
|--|------------------------|---|---|---|---------------|
|  | Absolute<br>CapEx      | a) Additions to property, plant and<br>equipment, internally generated<br>intangible assets, including in<br>conjunction with a business<br>combination or acquisition,<br>investment property acquired or<br>recognized at book value and,<br>where applicable, capitalized right-<br>of-use assets. | b) Additions from an<br>acquisition that<br>resulted in<br>conjunction with a<br>business combination | c) Expenses that resulted in<br>conjunction with taxonomy-aligned<br>business activities and of expenses<br>that resulted in conjunction with a<br>CapEx plan mentioned under section<br>1.1.2 of this appendix | CapEx<br>plan |
| <b>Only taxonomy-aligned activities</b>  |                        |   |   |   |               |
| 4.25 – Production of<br>heat/cool using<br>waste heat  | 43,627                 | 43,627  | 0   | 0   | 0             |
| 7.2 – Renovation of<br>existing buildings  | 179                    | 179   | 0   | 0   | 0             |
| 7.3 – Installation,<br>maintenance and<br>repair of energy<br>efficiency<br>equipment  | 857                    | 857   | 0   | 0   | 0             |
| 7.4 – Installation,<br>maintenance and<br>repair of charging<br>stations for electric<br>vehicles in buildings<br>(and parking spaces<br>attached to<br>buildings) | 454                    | 454   | 0   | 0   | 0             |
| 7.6 – Installation,<br>maintenance and<br>repair of renewable<br>energy<br>technologies  | 5,860                  | 5,860   | 0   | 0   | 0             |



## Taxonomy-eligible activities at Aurubis | Allocation to environmental objective<sup>1</sup> – Climate change mitigation

|  | EU Taxonomy activity  | Description of Aurubis activity  |
|--|---|--|
| <b>4 – Energy</b>                                  |   |  |
| 4.25   | Production of heat/cool using waste heat  | Construction of facilities that produce heat/cool using waste heat as part of the major Industrial Heat 2 project in Hamburg that uses waste heat to supply heat to HafenCity East |
| <b>6 – Transport</b>                               |   |  |
| 6.2  | Freight rail transport  | Leasing of tank wagon at the Hamburg site  |
| 6.5  | Transport by motorbikes, passenger cars and light commercial vehicles   | Company cars purchased <sup>1</sup>  |
| <b>7 – Construction and real estate activities</b> |   |  |
| 7.2  | Renovation of existing buildings  | Diverse construction and civil engineering works and preparation thereof for the renovation of production and office buildings   |
| 7.3  | Installation, maintenance and repair of energy efficiency equipment   | Individual renovation measures consisting of the installation, maintenance or repair of energy efficiency equipment  |
| 7.4  | Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings) | Installation and preparation of charging stations for electric vehicles for employees in parking spaces attached to buildings  |
| 7.6  | Installation, maintenance and repair of renewable energy technologies   | Installation of photovoltaic systems for internal energy production at the Pirdop and Stolberg sites <sup>2</sup>  |

<sup>1</sup> The activity allocation of the vehicles purchased changed compared to the previous year from EU Taxonomy activity 6.3 Public local and regional passenger transport, passenger vehicle transport to 6.5 Transport by motorbikes, passenger cars and light commercial vehicles.

<sup>2</sup> The activity allocation of the solar park projects changed compared to the previous year from EU Taxonomy Activity 4.1 Electricity generation using solar photovoltaic technology to 7.6 Installation, maintenance and repair of renewable energy technologies.

## Reporting form turnover

Criteria for a significant contribution

| Economic activities (1)   | Code(s)<br>(2) | Absolute<br>turnover<br>(3) | Share of<br>revenue,<br>FY 2022/23<br>(4) | Climate<br>protection<br>(5) | Climate<br>change<br>adaptation<br>(6) | Water and<br>marine<br>resources<br>(7) | The circular<br>economy<br>(8) | Environ-<br>mental<br>pollution<br>(9) |
|---|----------------|-----------------------------|---|------------------------------|--|---|--------------------------------|--|
|   |                |                             |   |                              |  |   |                                |  |
| <b>A. Taxonomy-eligible activities</b>  |                |                             |   |                              |  |   |                                |  |
| <b>A.1 Environmentally sustainable activities (taxonomy aligned)</b>  |                |                             |   |                              |  |   |                                |  |
| <b>Turnover environmentally sustainable activities (taxonomy aligned) (A.1)</b>   |                | <b>0</b>                    | <b>0</b>                                  |                              |  |   |                                |  |
| Enabling activities   |                | 0                           | 0   |                              |  |   |                                |  |
| Transitional activities   |                | 0                           | 0   |                              |  |   |                                |  |
| <b>A.2 Taxonomy-eligible, but not environmentally sustainable activities (taxonomy non-aligned activities)</b>            |                |                             |   |                              |  |   |                                |  |
| <b>Turnover taxonomy-eligible, but not environmentally sustainable activities (taxonomy non-aligned activities) (A.2)</b> |                | <b>0</b>                    | <b>0</b>                                  |                              |  |   |                                |  |
| <b>Total (A.1 + A.2)</b>  |                | <b>0</b>                    | <b>0</b>                                  |                              |  |   |                                |  |
| <b>B. Taxonomy non-eligible activities</b>  |                |                             |   |                              |  |   |                                |  |
| <b>Turnover taxonomy non-eligible activities (B)</b>  |                | <b>17,063,708</b>           | <b>100</b>                                |                              |  |   |                                |  |
| <b>Total (A + B)</b>  |                | <b>17,063,708</b>           | <b>100</b>                                |                              |  |   |                                |  |

<sup>1</sup> Only the taxonomy eligibility and not the taxonomy alignment of activities was assessed in FY 2021/22. It is therefore not possible to break taxonomy-eligible turnover for FY 2021/22 down into taxonomy-aligned and taxonomy non-aligned activities. Since no taxonomy-eligible turnover was released for the activity level, only the total taxonomy-eligible turnover for FY 2021/22 is disclosed as a comparative value.

DNSH criteria (do no significant harm)

| Biodiversity and ecosystems (10) | Climate protection (11) | Climate change adaptation (12) | Water and marine resources (13) | The circular economy (14) | Environmental pollution (15) | Biodiversity and ecosystems (16) | Minimum safeguards (17) | Taxonomy-aligned (A.1) or taxonomy-eligible share of revenue (A.2), FY 2021/22 (18) | Category (enabling activities) (19) | Category (transitional activities) (20) |
|----------------------------------|-------------------------|--------------------------------|---------------------------------|---------------------------|------------------------------|----------------------------------|-------------------------|---|-------------------------------------|---|
|                                  |                         |                                |                                 |                           |                              |                                  |                         | in %  | E                                   | T                                       |
|                                  |                         |                                |                                 |                           |                              |                                  |                         |   |                                     |   |
|                                  |                         |                                |                                 |                           |                              |                                  |                         | <b>n/a<sup>1</sup></b>  |                                     |   |
|                                  |                         |                                |                                 |                           |                              |                                  |                         | n/a <sup>1</sup>  | E                                   |   |
|                                  |                         |                                |                                 |                           |                              |                                  |                         | n/a <sup>1</sup>  |                                     | T                                       |
|                                  |                         |                                |                                 |                           |                              |                                  |                         |   |                                     |   |
|                                  |                         |                                |                                 |                           |                              |                                  |                         | <b>n/a<sup>1</sup></b>  |                                     |   |
|                                  |                         |                                |                                 |                           |                              |                                  |                         | <b>0</b>  |                                     |   |

## Reporting form OpEx

Criteria for a significant contribution

| Economic activities (1)   | Code(s)<br>(2) | Absolute<br>OpEx<br>FY 2022/23<br>(3) | Share of<br>OpEx<br>FY 2022/23<br>(4) | Climate<br>protection<br>(5) | Climate<br>change<br>adaptation<br>(6) | Water and<br>marine<br>resources<br>(7) | The circular<br>economy<br>(8) | Environ-<br>mental<br>pollution<br>(9) |
|---|----------------|---------------------------------------|---------------------------------------|------------------------------|--|---|--------------------------------|--|
|   |                |                                       |                                       |                              |  |   |                                |  |
| <b>A. Taxonomy-eligible activities</b>  |                |                                       |                                       |                              |  |   |                                |  |
| <b>A.1 Environmentally sustainable activities (taxonomy aligned)</b>  |                |                                       |                                       |                              |  |   |                                |  |
| <b>OpEx environmentally sustainable activities (taxonomy aligned) (A.1)</b>   |                | <b>0</b>                              | <b>0</b>                              |                              |  |   |                                |  |
| Enabling activities   |                | 0                                     | 0                                     |                              |  |   |                                |  |
| Transitional activities   |                | 0                                     | 0                                     |                              |  |   |                                |  |
| <b>A.2 Taxonomy-eligible, but not environmentally sustainable activities (taxonomy non-aligned activities)</b>        |                |                                       |                                       |                              |  |   |                                |  |
| <b>OpEx taxonomy-eligible, but not environmentally sustainable activities (taxonomy non-aligned activities) (A.2)</b> |                | <b>0</b>                              | <b>0</b>                              |                              |  |   |                                |  |
| <b>Total (A.1 + A.2)</b>  |                | <b>0</b>                              | <b>0</b>                              |                              |  |   |                                |  |
| <b>B. Taxonomy non-eligible activities</b>  |                |                                       |                                       |                              |  |   |                                |  |
| <b>OpEx taxonomy non-eligible activities (B)</b>  |                | <b>268,591</b>                        | <b>100</b>                            |                              |  |   |                                |  |
| <b>Total (A + B)</b>  |                | <b>268,591</b>                        | <b>100</b>                            |                              |  |   |                                |  |

<sup>1</sup> Only the taxonomy eligibility and not the taxonomy alignment of activities was assessed in FY 2021/22. It is therefore not possible to break taxonomy-eligible OpEx for FY 2021/22 down into taxonomy-aligned and taxonomy non-aligned activities. Since no taxonomy-eligible OpEx was released for the activity level, only the total taxonomy-eligible OpEx for FY 2021/22 is disclosed as a comparative value.

DNSH criteria (do no significant harm)

| Biodiversity and ecosystems (10) | Climate protection (11) | Climate change adaptation (12) | Water and marine resources (13) | The circular economy (14) | Environmental pollution (15) | Biodiversity and ecosystems (16) | Minimum safeguards (17) | Taxonomy-aligned (A.1) or taxonomy-eligible share of OpEx (A.2), FY 2021/22 (18) | Category (enabling activities) (19) | Category (transitional activities) (20) |
|----------------------------------|-------------------------|--------------------------------|---------------------------------|---------------------------|------------------------------|----------------------------------|-------------------------|--|-------------------------------------|---|
|                                  |                         |                                |                                 |                           |                              |                                  |                         | in %   | E                                   | T                                       |
|                                  |                         |                                |                                 |                           |                              |                                  |                         |  |                                     |   |
|                                  |                         |                                |                                 |                           |                              |                                  |                         | <b>n/a<sup>1</sup></b>   |                                     |   |
|                                  |                         |                                |                                 |                           |                              |                                  |                         | n/a <sup>1</sup>   | E                                   |   |
|                                  |                         |                                |                                 |                           |                              |                                  |                         | n/a <sup>1</sup>   |                                     | T                                       |
|                                  |                         |                                |                                 |                           |                              |                                  |                         |  |                                     |   |
|                                  |                         |                                |                                 |                           |                              |                                  |                         | <b>n/a<sup>1</sup></b>   |                                     |   |
|                                  |                         |                                |                                 |                           |                              |                                  |                         | <b>0</b>   |                                     |   |

## Reporting form CapEx

Criteria for a significant contribution

| <b>Economic activities (1)</b>  | Code(s)<br>(2) | Absolute<br>CapEx<br>(3) | Share of<br>CapEx<br>FY 2022/23<br>(4) | Contribution<br>to climate<br>change<br>(5) | Climate<br>change<br>adaptation<br>(6) | Water and<br>marine<br>resources<br>(7) | The circular<br>economy<br>(8) | Environ-<br>mental<br>pollution<br>(9) |
|---|----------------|--------------------------|--|---|--|---|--------------------------------|--|
|   |                | in € thousand            | in %                                   |   |  |   |                                |  |
| <b>A. Taxonomy-eligible activities</b>  |                |                          |  |   |  |   |                                |  |
| <b>A.1 Environmentally sustainable activities (taxonomy aligned)</b>  |                |                          |  |   |  |   |                                |  |
| 4.25 – Production of heat/<br>cool using waste heat   | CCM 4.25       | 43,627                   | 7                                      | J   | N EL                                   |   |                                |  |
| 7.2 – Renovation of existing buildings  | CCM 7.2        | 179                      | 0                                      | J   | N EL                                   |   |                                |  |
| 7.3 – Installation, maintenance and<br>repair of energy efficiency<br>equipment   | CCM 7.3        | 857                      | 0                                      | J   | N EL                                   |   |                                |  |
| 7.4 – Installation, maintenance and<br>repair of charging stations for<br>electric vehicles in buildings (and<br>parking spaces attached to<br>buildings) | CCM 7.4        | 454                      | 0                                      | J   | N EL                                   |   |                                |  |
| 7.6 – Installation, maintenance and<br>repair of renewable energy<br>technologies   | CCM 7.6        | 5,860                    | 1                                      | J   | N EL                                   |   |                                |  |
| <b>CapEx environmentally<br/>sustainable activities (taxonomy<br/>aligned) (A.1)</b>  |                | <b>50,977</b>            | <b>8</b>                               | <b>100</b>                                  |  |   |                                |  |
| Enabling activities   |                | 7,170                    | 1                                      | 38  |  |   |                                |  |
| Transitional activities   |                | 179                      | 0                                      | 13  |  |   |                                |  |

<sup>1</sup> Only the taxonomy eligibility and not the taxonomy alignment of activities was assessed in FY 2021/22. It is therefore not possible to break taxonomy-eligible CapEx for FY2021/22 down into taxonomy-aligned and taxonomy non-aligned activities. Since no taxonomy-eligible CapEx was released for the activity level, only the total taxonomy-eligible CapEx for FY 2021/22 is disclosed as a comparative value.

DNSH criteria (do no significant harm)

| Biodiversity and ecosystems (10) | Contribution to climate change (11) | Climate change adaptation (12) | Water and marine resources (13) | The circular economy (14) | Environmental pollution (15) | Biodiversity and ecosystems (16) | Minimum safeguards (17) | Taxonomy-aligned (A.1) or taxonomy-eligible share of CapEx (A.2), FY 2021/22 (18) | Category (enabling activities) (19) | Category (transitional activities) (20) |
|----------------------------------|-------------------------------------|--------------------------------|---------------------------------|---------------------------|------------------------------|----------------------------------|-------------------------|---|-------------------------------------|---|
|                                  |                                     |                                |                                 |                           |                              |                                  |                         | in %  | E                                   | T                                       |
|                                  | /                                   | J                              | NA                              | J                         | J                            | J                                | J                       | n/a <sup>1</sup>  |                                     |   |
|                                  | /                                   | J                              | J                               | J                         | J                            | NA                               | J                       | n/a <sup>1</sup>  |                                     | T                                       |
|                                  | /                                   | J                              | NA                              | NA                        | J                            | NA                               | J                       | n/a <sup>1</sup>  | E                                   |   |
|                                  | /                                   | J                              | NA                              | NA                        | NA                           | NA                               | J                       | n/a <sup>1</sup>  | E                                   |   |
|                                  | /                                   | J                              | NA                              | NA                        | NA                           | NA                               | J                       | n/a <sup>1</sup>  | E                                   |   |
|                                  | <b>/</b>                            | <b>J</b>                       | <b>J</b>                        | <b>J</b>                  | <b>J</b>                     | <b>J</b>                         | <b>J</b>                | <b>n/a<sup>1</sup></b>  |                                     |   |
|                                  |                                     |                                |                                 |                           |                              |                                  |                         | n/a <sup>1</sup>  | E                                   |   |
|                                  |                                     |                                |                                 |                           |                              |                                  |                         | n/a <sup>1</sup>  |                                     | T                                       |

Criteria for a significant contribution

| <b>Economic activities (1)</b>   | Code(s)<br>(2) | Absolute<br>CapEx<br>(3) | Share of<br>CapEx<br>FY 2022/23<br>(4) | Contribution<br>to climate<br>change<br>(5) | Climate<br>change<br>adaptation<br>(6) | Water and<br>marine<br>resources<br>(7) | The circular<br>economy<br>(8) | Environ-<br>mental<br>pollution<br>(9) |
|--|----------------|--------------------------|--|---|--|---|--------------------------------|--|
|  |                | in € thousand            | in %                                   |   |  |   |                                |  |
| <b>A.2 Taxonomy-eligible, but not environmentally sustainable activities (taxonomy non-aligned activities)</b>         |                |                          |  |   |  |   |                                |  |
| 6.2 – Freight rail transport   | CCM 6.2        | 536                      | 0                                      | EL  | N EL                                   |   |                                |  |
| 6.5 – Transport by motorbikes, passenger cars and light commercial vehicles  | CCM 6.5        | 320                      | 0                                      | EL  | N EL                                   |   |                                |  |
| 7.2 – Renovation of existing buildings   | CCM 7.2        | 15,401                   | 3                                      | EL  | N EL                                   |   |                                |  |
| 7.3 – Installation, maintenance and repair of energy efficiency equipment  | CCM 7.3        | 533                      | 0                                      | EL  | N EL                                   |   |                                |  |
| <b>CapEx taxonomy-eligible, but not environmentally sustainable activities (taxonomy non-aligned activities) (A.2)</b> |                | <b>16,790</b>            | <b>3</b>                               | <b>100</b>                                  | <b>0</b>                               |   |                                |  |
| <b>Total (A.1 + A.2)</b>   |                | <b>67,767</b>            | <b>11</b>                              | <b>100</b>                                  | <b>0</b>                               |   |                                |  |
| <b>B. Taxonomy non-eligible activities</b>   |                |                          |  |   |  |   |                                |  |
| <b>CapEx taxonomy non-eligible activities (B)</b>  |                | <b>555,754</b>           | <b>89</b>                              |   |  |   |                                |  |
| <b>Total (A + B)</b>   |                | <b>623,521</b>           | <b>100</b>                             |   |  |   |                                |  |

<sup>1</sup> Only the taxonomy eligibility and not the taxonomy alignment of activities was assessed in FY 2021/22. It is therefore not possible to break taxonomy-eligible CapEx for FY2021/22 down into taxonomy-aligned and taxonomy non-aligned activities. Since no taxonomy-eligible CapEx was released for the activity level, only the total taxonomy-eligible CapEx for FY 2021/22 is disclosed as a comparative value.



DNSH criteria (do no significant harm)

| Biodiversity and ecosystems (10) | Contribution to climate change (11) | Climate change adaptation (12) | Water and marine resources (13) | The circular economy (14) | Environmental pollution (15) | Biodiversity and ecosystems (16) | Minimum safeguards (17) | Taxonomy-aligned (A.1) or taxonomy-eligible share of CapEx (A.2), FY 2021/22 (18) | Category (enabling activities) (19) | Category (transitional activities) (20) |
|----------------------------------|-------------------------------------|--------------------------------|---------------------------------|---------------------------|------------------------------|----------------------------------|-------------------------|---|-------------------------------------|---|
|                                  |                                     |                                |                                 |                           |                              |                                  |                         | in %  | E                                   | T                                       |
|                                  |                                     |                                |                                 |                           |                              |                                  |                         | n/a <sup>1</sup>  |                                     |   |
|                                  |                                     |                                |                                 |                           |                              |                                  |                         | n/a <sup>1</sup>  |                                     |   |
|                                  |                                     |                                |                                 |                           |                              |                                  |                         | n/a <sup>1</sup>  |                                     |   |
|                                  |                                     |                                |                                 |                           |                              |                                  |                         | n/a <sup>1</sup>  |                                     |   |
|                                  |                                     |                                |                                 |                           |                              |                                  |                         | <b>n/a<sup>1</sup></b>  |                                     |   |
|                                  |                                     |                                |                                 |                           |                              |                                  |                         | <b>10</b>   |                                     |   |

## Limited assurance report of the independent practitioner regarding the non-financial reporting

To Aurubis AG, Hamburg/Germany

### OUR ENGAGEMENT

We have performed a limited assurance engagement on the separate non-financial group report of Aurubis AG, Hamburg/Germany, (hereafter referred to as “the Company”) for the financial year from 1 October 2022 to 30 September 2023 (hereafter referred to as “non-financial reporting”).

Our engagement did not cover the external sources of documentation stated in the non-financial reporting and the contents of any websites referenced in the non-financial reporting.

### RESPONSIBILITIES OF THE EXECUTIVE DIRECTORS

The executive directors of Aurubis AG are responsible for the preparation of the non-financial reporting in accordance with Section 315c in conjunction with Sections 289c to 289e German Commercial Code (HGB) and Article 8 of Regulation (EU) 2020/852 of the European Parliament and the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 (hereafter referred to as “EU Taxonomy Regulation”) and the delegated acts adopted thereon, as well as with the executive directors’ interpretation of the wording and terminology contained in the EU Taxonomy Regulation and the delegated acts adopted thereon, as is presented in section “EU Taxonomy” of the non-financial reporting.

These responsibilities of the executive directors of the Company include the selection and application of appropriate methods regarding the non-financial reporting and the use of assumptions and estimates for individual non-financial disclosures of the Group which are reasonable under the given circumstances. In addition, the executive directors are responsible for such internal control as they have determined necessary to enable the preparation of a non-financial reporting that is free from material misstatement, whether due to fraud (i.e. fraudulent non-financial reporting) or error.

Some of the wording and terminology contained in the EU Taxonomy Regulation and the delegated acts adopted thereon is still subject to considerable interpretation uncertainty and has not yet been officially clarified. Therefore, the executive directors have laid down their own interpretation of the EU Taxonomy Regulation and of the delegated acts adopted thereon in the section “EU Taxonomy” of the non-financial reporting. They are responsible for the reasonableness of this interpretation. As there is the inherent risk that indefinite legal concepts may allow for various interpretations, the legal conformity of the interpretation is prone to uncertainty.

The preciseness and completeness of the environmental data in the non-financial reporting is subject to inherent restrictions resulting from the manner in which the data was collected and calculated as well as from assumptions made.

## **INDEPENDENCE AND QUALITY ASSURANCE OF THE AUDIT FIRM**

We have complied with the German professional requirements on independence and other professional rules of conduct.

Our audit firm applies the national statutory rules and professional announcements – particularly of the Professional Code of Conduct for German Public Auditors and Sworn Auditors (BS WP/vBP) and of the IDW Quality Assurance Standard: Quality Assurance Requirements in Audit Practices (IDW QS 1) promulgated by the Institut der Wirtschaftsprüfer (IDW) – and therefore maintains a comprehensive quality assurance system comprising documented regulations and measures in respect of compliance with professional rules of conduct, professional standards, as well as relevant statutory and other legal requirements.

## **RESPONSIBILITIES OF THE INDEPENDENT PRACTITIONER**

Our responsibility is to express a conclusion on the non-financial reporting based on our work performed within our limited assurance engagement.

We conducted our work in accordance with the International Standard on Assurance Engagements (ISAE) 3000 (Revised): Assurance Engagements Other than Audits or Reviews of Historical Financial Information, adopted by the IAASB. This Standard requires that we plan and perform the assurance engagement so that we can conclude with limited assurance whether matters have come to our attention to cause us to believe that the non-financial reporting of the Company, with the exception of the external sources of documentation and websites stated therein, has not been prepared, in all material respects, in accordance with Section 315c in conjunction with Sections 289c to 289e HGB, the EU Taxonomy Regulation and the delegated acts adopted thereon, as well as with the executive directors' interpretation presented in the section "Disclosures in accordance with the EU Taxonomy Regulation" of the non-financial reporting.

The procedures performed in a limited assurance engagement are less in extent than for a reasonable assurance engagement; consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. The choice of assurance work is subject to the practitioner's professional judgement.

Within the scope of our limited assurance engagement, which we performed between April and December 2023, we performed, among others, the following procedures and other work:

- » Gaining an understanding of the structure of the Group's sustainability organisation and of the stakeholder engagement
- » Inquiries of the executive directors and relevant personnel involved in the process of preparation, about the process of preparation, about the system of internal control relating to this process, as well as about the disclosures contained in the non-financial reporting
- » Evaluation of the process to identify taxonomy-eligible and taxonomy-aligned economic activities and of the corresponding disclosures in the non-financial reporting
- » Identification of probable risks of material misstatements in the non-financial reporting
- » Analytical evaluation of disclosures in the non-financial reporting
- » Tests of details in order to evaluate selected material disclosures in the non-financial reporting
- » Squaring of the disclosures in the non-financial reporting with the corresponding data in the consolidated financial statements and in the combined management report
- » Evaluation of the presentation of the non-financial reporting

The determination of the disclosures pursuant to Article 8 of the EU Taxonomy Regulation requires the executive directors to make interpretations of indefinite legal concepts. As there is the inherent risk that indefinite legal concepts may allow for various interpretations, the legal conformity of the interpretation, and hence our related examination, is prone to uncertainty.

## PRACTITIONER'S CONCLUSION

Based on the work performed and the evidence obtained, nothing has come to our attention that causes us to believe that the separate non-financial group report of Aurubis AG for the financial year from 1 October 2022 to 30 September 2023 has not been prepared, in all material respects, in accordance with Section 315c in conjunction with Sections 289c to 289e HGB and the EU Taxonomy Regulation and the delegated acts adopted thereon, as well as with the executive directors' interpretation presented in the section "Disclosures in accordance with the EU Taxonomy Regulation" of the non-financial reporting.

We do not express a conclusion on the external sources of documentation stated in the non-financial reporting and the contents of any websites referenced in the non-financial reporting.

## RESTRICTIONS OF USE

We issue this report as stipulated in the engagement letter agreed with Aurubis AG (including the “General Engagement Terms for Wirtschaftsprüfer and Wirtschaftsprüfungsgesellschaften (German Public Auditors and Public Audit Firms)” in the version dated 1 January 2017 promulgated by the Institut der Wirtschaftsprüfer (IDW)). We draw attention to the fact that the assurance engagement was performed for the purposes of Aurubis AG and the report is solely designed for informing Aurubis AG about the findings of the assurance engagement. Therefore, it may not be suitable for a purpose other than the aforementioned one. Hence, this report should not be used by third parties as a basis for any (asset) decision.

We are liable solely to the Company. However, we do not accept or assume liability to third parties. Our conclusion was not modified in this respect.

Hamburg/Germany, 19 December 2023

Deloitte GmbH  
Wirtschaftsprüfungsgesellschaft

Signed:  
Daniel Oehlmann  
Wirtschaftsprüfer  
(German Public Auditor)

Signed:  
ppa Eike Bernhard Hellmann