

Aurubis Business Partner Code of Conduct

Sustainability is an integral part of Aurubis' Group strategy. We treat the environment and the world's limited natural resources with care. We exhibit responsibility towards our employees, suppliers, customers, and neighbors. The same is true for the areas surrounding our sites and for the communities in which we do business.

Aurubis AG has participated in the United Nations Global Compact (UNGC) since the end of 2014 and supports its visions and objectives regarding human rights, labor rights, the environment, and business ethics. We expect our business partners to adhere to the same standards to ensure that our value chain is managed responsibly.

Aurubis expects its business partners to comply with the fundamental conventions of the International Labour Organization (the ILO), the United Nations' Universal Declaration of Human Rights, and with applicable national and local laws and regulations.



1. HUMAN RIGHTS AND LABOR RIGHTS

- 1.1. **Human rights:** Business partners shall respect the fundamental human rights of every employee, treating them with dignity, respect, and fairness. This applies to every type of employment.
- 1.2. **Child labor:** Business partners shall refrain from using or supporting any form of child labor.
- 1.3. **Forced and compulsory labor:** Business partners shall not utilize, be involved in, or obtain an advantage from any forced or compulsory labor.
- 1.4. **Freedom of association and collective bargaining:** Business partners ensure employees' rights of freedom of association and collective bargaining in accordance with local laws.
- 1.5. **Working time and remuneration:** Business partners ensure compliance with applicable laws and industry standards on collective bargaining agreements, working time, and remuneration.
- 1.6. **Non-discrimination:** Business partners ensure a workforce free of harassment and discrimination. Companies refrain from discrimination on the basis of ethnic origin, nationality, social background, gender and gender identity, sexual orientation, age, disability, religion, political affiliation, or union membership.
- 1.7. **Local communities:** Business partners are conscientious when interacting with the local communities, including indigenous people and landowners, ensuring their rights and acting respectfully and fairly towards them.
- 1.8. **Security practice:** If business partners are working with security personnel or services, they make sure that human rights and international standards on using force are respected.

2. OCCUPATIONAL HEALTH AND SAFETY

Business partners demonstrate a proactive approach to occupational health and safety. Business partners identify, assess, and eliminate or mitigate potential risks to workers' health and safety, including contractors, during their activities.

3. ENVIRONMENT

- 3.1. **Legal compliance:** Business partners comply with the applicable requirements in environmental law.
- 3.2. **Environmental impact:** Business partners conduct business in a responsible way as regards environmental risks and impact. Aurubis expects its business partners to establish and maintain processes and procedures to minimize environmental impact and risks and to improve environmental performance.
- 3.3. **Carbon emissions:** Business partners continuously strive to minimize greenhouse gas emissions. Aurubis encourages its business partners to track and document energy consumption and all relevant Scope 1 and Scope 2 greenhouse gas emissions.

4. BUSINESS INTEGRITY

- 4.1. **Anti-corruption:** Business partners shall work against corruption in all its forms.
- 4.2. **Fair competition:** Business partners shall comply with competition and anti-trust laws.
- 4.3. **Conflicts of interest:** Business partners take appropriate precautions to avoid relations, activities, or business undertakings in which any private interests or relationships have influenced or have the potential to influence a business decision.
- 4.4. **Money laundering:** Business partners comply with applicable laws governing the prevention of money laundering.
- 4.5. **Taxes, fees, and royalties:** Business partners make sure that all mandated taxes, fees, and royalties connected to activities such as trade, export and mineral extraction are paid to governments.

5. RESPONSIBLE SOURCING OF MINERALS

We expect business partners to take necessary steps to identify and assess risk in their supply chains. Business partners shall ensure that conflict minerals are not sold to Aurubis.

6. ALERT PROCEDURE

If business partners suspect that there has been a violation of the law or a breach of this code or of other Aurubis rules and policies, they can report this using the external, independent Aurubis Compliance Portal (“Whistleblower Hotline”). Contact information for compliance issues can be found on the Aurubis homepage under “Compliance.”

7. IMPLEMENTATION AND MONITORING

Business partners comply with this code, and they have established a suitable process to confirm their compliance with this code. To verify compliance, Aurubis reserves the right to request information and data. Based on the OECD Due Diligence Guidance and upon mutual agreement, Aurubis can carry out an audit at the business partner’s operations and facilities.

Should Aurubis come to the conclusion that a business partner does not comply with this Business Partner Code of Conduct, Aurubis will enter into a dialogue with the business partner to drive and support improvements. Business partners communicate these fundamental principles and requirements to their own business partners and encourage them to observe these standards.

THE AURUBIS BUSINESS PARTNER CODE OF CONDUCT IS BASED ON CURRENT INTERNATIONAL REFERENCE DOCUMENTS AND STANDARDS, INCLUDING:

- » The United Nations Global Compact
- » The United Nations Universal Declaration of Human Rights
- » The International Labour Organization's (ILO's) Declaration on Fundamental Principles and Rights at Work
- » The Rio Declaration on Environment and Development (result of the United Nations Conference on Environment and Development 1992)
- » The United Nations Convention against Corruption
- » The United Nations Convention on the Rights of the Child



If you have **any questions**, please send an e-mail to **responsibility@aurubis.com**.