
Public Due Diligence Report for Responsible sourcing

Date: April 15th, 2024

Responsible senior manager: Peter Boeckx

Responsible manager: Vanessa Germonpré

Company Information

Aurubis Beerse and Aurubis Berango are recycling and refining companies, valorizing complex non-ferrous secondary scrap and materials and returning metals (including Tin metal) back into the value chain.

Aurubis Beerse (CID 002773), located in Beerse (Belgium), was established in 1919 and Aurubis Berango (CID 002774), located in Berango (Spain), was established in 1991. Both companies work closely together using a unique technology and know-how, accepted as Best Available Technique, to minimize the impact of our activities on people, environment and climate.

Aurubis Beerse produces Copper, Lead and Tin materials and intermediates by smelting and refining complex recycling materials (copper scrap, copper alloyed scrap, copper bearing ashes/residues/slag, tin and lead bearing scraps and residues, ...).

Aurubis Berango produces “black copper” from low grade copper bearing materials (ashes, residues, slag, copper/irony scrap, ...) in the same way as the “smelting process” of Aurubis Beerse. The black copper produced in Spain can be sold to third parties, but is normally further processed at Aurubis Beerse. Aurubis Berango also consumes lead-tin bearing materials for the production of solder shots, which are processed by Aurubis Beerse.

Aurubis Beerse is a member of the International Tin Association (ITA) and participates in the Responsible Minerals Initiative (RMI) RMAP audit program. Aurubis Beerse and Aurubis Berango hold ISO 9001, ISO 14001, ISO 45001 and ISO 50001 certifications.

Since June 1st, 2020 Aurubis Beerse (formerly Metallo Belgium) and Aurubis Berango (formerly Metallo Spain) are part of the Aurubis Group, a leading worldwide provider of non-ferrous metals, processing complex metal concentrates and diverse recycling raw materials. Aurubis is the global leader for copper recycling.

RMAP Assessment Summary

Previous assessment against the Tin and Tantalum Standard (2017) under the Responsible Minerals Assurance Process (RMAP), took place on March 9-10, 2023 and March 13-14, 2023 at Aurubis Beerse and Aurubis Berango

respectively, for the audit period 1/1/2022 – 12/31/2022. Arche Advisors carried out the assessments (lead auditor: Mr. Kaido Katalsepp, co-auditor: Ms. Emily Brennan). The audit reports can be consulted on the website of RMI:

<https://www.responsiblemineralsinitiative.org/media/docs/Public%20Reports/Aurubis%20Beerse%20Public%20Report.pdf>

<https://www.responsiblemineralsinitiative.org/media/docs/Public%20Reports/Aurubis%20Berango%20Public%20Report.pdf>

Next RMAP assessment has been scheduled on 5-6 February, 2024 in Beerse and 8-9 February, 2024 in Berango for the assessment period 1/1/2023 – 12/31/2023.

Company Responsible Sourcing Policy

Aurubis has developed and implemented a Corporate Responsible Sourcing Policy in order to avoid the use of conflict minerals, which directly or indirectly finance or benefit armed groups or other serious human rights abuses in Conflict Affected and High-Risk Areas. The Corporate Responsible Sourcing Policy is aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-risk Areas. It covers all the risks listed in Annex II of the Guidance.

We are committed to addressing these identified risks. Aurubis Beerse and Aurubis Berango have made the policy publicly available on the website and have communicated the policy to relevant stakeholders:

[https://www.aurubis.com/dam/jcr:919a1550-9528-4ade-a4c4-c2f0610f68ae/20231128_official_RSP_2023_update%20\(002\).pdf](https://www.aurubis.com/dam/jcr:919a1550-9528-4ade-a4c4-c2f0610f68ae/20231128_official_RSP_2023_update%20(002).pdf)

Company Management Systems

Management Structure and Responsibility

The daily management of Aurubis Beerse and Aurubis Berango is in the hands of Managing Director Mr. Dirk Vandenberghe and Mr. Valentin Casado, respectively. Responsibility for the execution and implementation of the tin supply chain due diligence program at Aurubis Beerse and Berango is delegated to Mr. Peter Boeckx (Recycling Business Advisor), supported by Ms. Vanessa Germonpré (Regulatory Affairs Manager), responsible to coordinate the work of the relevant departments (including the Commercial Department, the Logistics Department, the Quality Department and the Sustainable Development Department).

Once a year training is conducted for key staff from relevant departments to increase awareness towards Responsible Sourcing in the supply chain. Four training sessions have been organized in July - September 2023 to involve the entire Commercial department. If there is an update of the program, additional training is organized.

Systems of Control and Transparency

Aurubis Beerse and Aurubis Berango have started to implement RMI's revised standard for tin and aligned its due diligence program further with the OECD Guidance as of May 2018, after the training held by RMI in Budapest.

The Supply Chain Policy has been communicated to all direct suppliers and is publicly available on the website of Aurubis Beerse and Aurubis Berango.

To fulfill our due diligence obligation with regard to all of our material topics in the supply chain area, Aurubis has implemented a new Business Partner and Supply Chain Screening system based on OECD guidelines.

Human rights and environmental risks, as well as violations of human rights or environmental responsibilities, that result from Aurubis' business activities in its own business area or with direct and indirect suppliers, can be reported via our whistleblower hotline. Aurubis refers to the Aurubis Compliance Portal to collect information on grievances from interested parties: <https://www.aurubis.com/en/Responsibility/whistleblower-hotline>.

Record Keeping System

All records relating to the supply chain like contracts and the due diligence program are maintained for at least 5 years and stored in the company databases as stated in the management systems. The supply chain software used by Aurubis Beerse and Berango is called 'GAN'.

Risk Assessment

Referring to the **Responsible Sourcing Policy**, Aurubis Beerse and Berango aim at preventing or mitigating, i.a. all risks identified in Annex II of the OECD Guidance.

The new **Business Partner and Supply Chain Screening** is the process implemented to identify, manage, and monitor risks associated with engaging business partners. Before contracting and conducting business with a new supplier, the supplier must go through the screening process in the Business Partner Screening (BPS) tool to assess it considering ESG, Compliance, Financial and Tax risk considerations.

Existing suppliers are screened according to a risk-based approach i.a. in the order of the results of the previous screening process and/or the respective country, sector, and material specific risk.

Aurubis Beerse and Berango are in the process of transitioning the existing Know Your Counterparty (KYC) records to the new Business Partner Screening tool, tin suppliers being the first priority.

As part of the Business Partner and Supply Chain Screening Process, Aurubis Beerse and Aurubis Berango have a **procedure in place to identify "Conflict Affected and High-Risk Areas" (CAHRAs)** and to identify red flags in the supply chain. The procedure will apply to all suppliers of primary tin material.

Aurubis has implemented the TDI CAHRA Index, which takes into consideration several country indices ((e.g. TI/CPI, CAHRA lists, Conflict Barometer, Human Freedom Index). Based on the TDI CAHRA Index countries' risk level is categorized as high, medium or low risk. All countries are registered in an overview "List of CAHRAs" along with the overall CAHRA Rating (high risk, medium risk, low risk). This list will be applicable to the country of origin and transit routes.

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Supplier/material combinations assigned a medium or high risk level require enhanced due diligence checks.

Risk assessment Aurubis Beerse & Berango

The majority of materials sourced comes from secondary sources; less than 1% of the total sourced shipment weight concerns intermediate or primary material.

Aurubis purchases a by-product generated during the primary processing of tin concentrates, which does not fall under the definition of secondary material and is considered intermediate material. Aurubis purchases this material only from RMAP conforming smelters. For those supply chains of intermediate material determined to be medium or high risk due to geographic considerations, enhanced due diligence has been conducted.

Aurubis Beerse: in 2023 intermediate material has been sourced directly from smelters located in a CAHRA according to the CAHRA procedure (Brazil, Thailand). Therefore, enhanced assessment was performed for the transport from smelter to export location. These enhanced due diligence checks were done through the BPS process by means of additional questionnaire assessments verifying transportation mode and transport companies used, as well as checks of the transportation documents, export records, certificates of origin, production certificates. In addition, the subject material is always shipped in sealed containers and per default third party analyses are carried out on the delivered material. Based on these checks no discrepancies or red flags have been identified.

Aurubis Berango: in 2023 no primary material has been purchased from sources located in a CAHRA. No red flags have been identified in the supply chain in 2023.