



The Copper Mark Summary Report

Participant Information

Name of the Site	Aurubis AG, Luenen
Unique identifier provided by the Copper Mark	P0025
Address	Kupferstrasse 23, D-44532
Country of Operation	Germany
Copper products produced on site (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	Copper cathodes
Metals produced on site (e.g., copper, gold, nickel, silver, molybdenum)	Copper, zinc oxide, nickel sulphate, lead-tin-alloy, gold, silver and PGM (final extraction at Hamburg site)
Metals included in scope of Criterion 31 (this must be all, or a sub-set of the metals produced on site)	Copper
Metals covered by other independent assessments for Criterion 31 (e.g., RMAP, LBMA, RJC, etc.)	NA
Types of operations included in scope	
Mining	<input type="checkbox"/>
Concentrate blending	<input type="checkbox"/>
Solvent extraction and electrowinning	<input type="checkbox"/>
Smelting	<input checked="" type="checkbox"/>
Refining	<input checked="" type="checkbox"/>
Fabrication	<input checked="" type="checkbox"/>
Other (<i>please explain</i>)	
Infrastructure owned or controlled by the site and included in scope	
Roads	<input checked="" type="checkbox"/>
Rails	<input checked="" type="checkbox"/>

Ports	<input type="checkbox"/>
Other (<i>please explain</i>)	

Independent Review

<p>During this step, the Independent Reviewer examined the Copper Producer’s self-assessment, supporting documentation, independent third-party assurance reports, and publicly available information.</p> <p>The activities included review for completeness, verifying equivalence, and conducting desk-based due diligence.</p> <p>As a result, the Independent Reviewer recommended the scope of the site assessment to the Copper Mark.</p> <p>The Independent Review took place on these dates:</p>	<p>4 January – 14 February 2022</p>
<p>The Independent Reviewer confirmed completeness, indicating available evidence for the assessor to review for all applicable criteria:</p>	<p>All criteria except:</p> <ul style="list-style-type: none"> • 7. Freedom of Association and Collective Bargaining • 9. Gender Equality • 10. Working Hours • 11. Remuneration • 17. Freshwater Management • 30. Cultural Heritage
<p>The Independent Reviewer recommended the following criteria be included in the scope of the independent site assessment:</p>	<p>All except:</p> <ul style="list-style-type: none"> • 12. Occupational Health and safety • 14. Environmental Risk Management • 16. Energy Consumption • 19. Tailings Management • 22. Mine Closure and Reclamation • 25. Artisanal and Small-Scale Mining • 27. Security and Human Rights • 28. Indigenous Peoples’ Rights • 29. Land Acquisition and Resettlement

The following equivalent systems were applied:

Equivalent systems are determined by the Copper Mark to have standards and assurance requirements that are materially comparable in scope and intent to those of the Copper Mark, in accordance with the Copper Mark Recognition Process.

Equivalent System <i>(Name, date of assurance / certification)</i>	Review Process	Criteria Covered by Equivalency
ISO 14001:2015 7 June 2020	<p>The Independent Reviewer confirmed the assurance / certification was:</p> <ul style="list-style-type: none"> • Valid at the time of the review • No more than 24 months old and / or plans for reassessment are underway • In effect for an additional 12 months and / or plans for reassessment are underway • Covering the same scope as the Copper Mark Responsible Production Criteria, including operations, locations, and materials • Accompanied by improvement plans where applicable 	<ul style="list-style-type: none"> • 14. Environmental Risk Management • 16. Energy Consumption
ISO 45001:2019 28 May 2021	<p>The Independent Reviewer confirmed the assurance / certification was:</p> <ul style="list-style-type: none"> • Valid at the time of the review • No more than 24 months old and / or plans for reassessment are underway • In effect for an additional 12 months and / or plans for reassessment are underway 	12. Occupational Health and Safety

	<ul style="list-style-type: none"> • Covering the same scope as the Copper Mark Responsible Production Criteria, including operations, locations, and materials • Accompanied by improvement plans where applicable 	
<p>The Independent Reviewer recommended the following criteria be considered focus areas for the independent site assessment:</p>	<ul style="list-style-type: none"> • 7. Freedom of Association and Collective Bargaining • 9. Gender Equality • 10. Working Hours • 11. Remuneration • 17. Freshwater Management • 30. Cultural Heritage 	
<p>The Independent Reviewer recommended the following criteria be considered not applicable to the Site:</p>	<ul style="list-style-type: none"> • 19. Tailings Management • 22. Mine Closure and Reclamation • 25. Artisanal and Small-Scale Mining • 27. Security and Human Rights • 28. Indigenous Peoples' Rights • 29. Land Acquisition and Resettlement 	

Independent Site Assessment Information

Name of the Lead Assessor	David Shirley Criterion 31: Josue Ruiz
Name of the Assessment Firm (if applicable)	Corporate Integrity Ltd. Criterion 31: RCS Global Ltd.
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	March 2022 – Document review 4, 7-8 April 2022 – Site visit Criterion 31: 27-28 April, 2-3 May 2022
Assessment Period	1 January – 31 December 2021 Criterion 31: 1 April 2021 – 31 March 2022; 27 April 2021 – 26 April 2022

<p>Summary of the Assessment Methodology</p>	<p>The work was carried out in accordance with Corporate Integrity Ltd.'s assurance procedures, designed to undertake an evidence-based assessment to provide reasonable assurance. Assessment activities were risk based with focus on material issues and included:</p> <ol style="list-style-type: none"> 1. Reviews of processes in place to identify and prioritise ESG risks and opportunities during the reporting period. 2. Reviews of the policies, systems and approaches that Aurubis is using to manage these risks and opportunities. 3. The collection and assimilation of performance information; and 4. Internal and external stakeholder interviews. <p>Number of permanent workers: 670 Number of temporary workers: 38 Number of contract workers: 30</p>
<p>Summary of the Assessment Activities</p>	<p>Pre-arrival (desktop)</p> <ul style="list-style-type: none"> • Desk Review of all submitted documents plus clarification discussions with Aurubis team <p>Day 1</p> <ul style="list-style-type: none"> • Opening meeting and ESG risks • Assessment of criteria related to legal compliance and business integrity • Assessment of criteria related to responsible sourcing • Assessment of criteria related to human resources and human rights • Assessment of criteria related to transparency and disclosure • Assessment of criteria related to business relationships • Review of internal audits\ <p>Day 2</p> <ul style="list-style-type: none"> • Introductions from the site • Site tour • Internal interviews • Assessment of criteria related to community health and safety and community development • Assessment of criteria related to greenhouse gas emissions, freshwater management, biodiversity <p>Day 3</p> <ul style="list-style-type: none"> • Interviews with works council

	<ul style="list-style-type: none"> • Interviews with external stakeholders <p>Day 4: Assessment of Criterion 31</p>
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Summary of Findings

Criterion	Rating <i>Fully meets, partially meets, does not meet, not applicable</i>	Comments <i>Includes link to publicly available documents or supporting evidence where possible and at a minimum for those criteria with an *</i>
1. Legal Compliance	Fully meets	<p>Aurubis AG is heavily regulated under German and EU law. The site has a system in place designed to ensure legal compliance. This is documented in the Compliance Policy and Compliance Management System. The management system is resourced at corporate office and throughout the operations by designated personnel responsible for legal compliance, including a dedicated team to monitor current and future European Union regulation. The system is supported by a register of all legal obligations and the responsible person designated to each obligation.</p> <p>Further evidence of conformance was provided through review of annual reports and external audits that cover legal compliance elements.</p>
2. Business Integrity	Fully meets	<p>Luenen has policies and management systems in place to support business integrity that are overseen by dedicated Local Compliance Representatives. The systems are complemented with training and an anonymous whistle-blowing hotline. Records were reviewed to confirm the hotline is used and complaints are investigated.</p> <p>Facilitation payments are prohibited as per German law.</p>
3. Stakeholder Engagement*	Fully meets	<p>Luenen carries out stakeholder mapping, engagement, and communications. External stakeholder interviews indicated that there is a good relationship with stakeholders. The formal grievance process is available at https://www.aurubis.com/en/responsibility/whistleblower-hotline</p>
4. Business Relationships	Fully meets	<p>There is a corporate run program to screen suppliers and contractors before onboarding.</p> <p>The Corporate Compliance department is responsible for the implementation of the screening process, with</p>

		<p>significant input from the sustainability team and oversight by the Board.</p> <p>Once onboarded, suppliers and contractors are subject to contract clauses requiring business partners to comply with Aurubis Policies including the Business Partner Code of Conduct, which includes ESG requirements. Site management is responsible for day-to-day management of contractors, who are subject to annual audits. Screening for this process is being further developed.</p>
5. Child Labor	Fully meets	<p>Child labor policies are included in the Code of Conduct and the Business Partner Code of Conduct, both of which also include commitments to ILO labor Standards. Luenen has procedures in place to verify age.</p> <p>The site has a vocational training program in place, which includes 16–18-year-olds. Appropriate controls are in place for this program.</p>
6. Forced Labor	Fully meets	<p>Forced labor policies are included in the Code of Conduct and the Business Partner Code of Conduct, these also include commitments to ILO labor Standards. The site also publishes in accordance with the UK Modern Slavery Act.</p> <p>A training course that includes content on forced labor is currently being rolled out.</p>
7. Freedom of Association and Collective Bargaining	Fully meets	<p>The right to freedom of association and the right to collective bargaining are required by policy in the Code of Conduct and the Business Partner Code of Conduct and are in line with German law. All workers at the site are represented by Works Councils and these in turn communicate with a Central Works Council. Works Councils Members at each site are elected by the workforce. The Works Councils negotiate additional agreements to the main collective agreement. There are collective bargaining agreements in place that cover the full range of employment topics.</p> <p>Interviews with Works Councils members and members of the workforce confirmed that the Works Councils active at the site for two-way communications on work-related issues.</p>
8. Discrimination	Partially meets	<p>Discrimination and harassment policies are included in the Code of Conduct and the Business Partner Code of Conduct. These also include commitments to ILO labor Standards and aligned with German law.</p> <p>Opportunity for improvement:</p>

		<ul style="list-style-type: none"> Aurubis AG is planning to introduce a Diversity Policy in 2022, however this Policy is not in place and enacted yet.
9. Gender Equality	Partially meets	<p>Gender equality requirement is included in the Code of Conduct. A Diversity policy with more specific gender-related elements is under development. There are initiatives in place to promote women in their career paths.</p> <p>Female interviewees at Luenen stated that they are comfortable with benefits and that these are fair and equal for women, also that bonuses are based on performance and are not discriminatory.</p> <p>Opportunities for improvement:</p> <ul style="list-style-type: none"> Aurubis AG is planning to introduce a Diversity Policy in 2022, however this Policy is not in place and enacted yet. Raise awareness on language use and behaviors relating to gender
10. Working Hours	Fully meets	<p>Policy wording on working hours is included in the Code of Conduct and the Business Partners Code of Conduct in line with German law and the collective bargaining agreements in place. Overtime is voluntary.</p> <p>Hours are monitored through a time management system that tracks working hours and alerts when they are over the daily maximum. Interviews with workers confirmed the adherence to working hour limits.</p>
11. Remuneration	Fully meets	<p>Policy wording on remuneration is included in the Code of Conduct and the Business Partners Code of Conduct and aligns with German minimum wage, which is aligned with expectations of what is required as a living wage as are national unemployment and benefit schemes.</p> <p>Remuneration tariffs and benefits for various work placements are set in the collective bargaining agreement.</p>
12. Occupational Health and Safety	Fully meets	<p>The independent reviewer confirmed that the site meets the requirement as validated through ISO 45001 certification.</p> <p>A site walk-through confirmed that there is appropriate housekeeping, that workers were appropriately kitted out with PPE, and that safety signs and barriers were in place. Interviewees commented on the company focus on a safe working environment.</p>

<p>13. Grievance Mechanism</p>	<p>Fully meets</p>	<p>Aurubis has a grievance mechanism aligned with the UN Guiding Principles effectiveness criteria available to internal and external stakeholders. The whistleblowing line is run by an independent ombudsman and is available to all stakeholders.</p> <p>This is complemented by an anonymous internally available support hotline that is managed through an external organization and is available 24/7.</p> <p>Workers can also raise concerns with conversations with line managers, human resources, or through the Works Councils.</p> <p>Management recognized a need to strengthen the culture of feedback and has begun to do so by setting a target of receiving “pulse checks” from workers on feedback processes.</p>
<p>14. Environmental Risk Management</p>	<p>Fully meets</p>	<p>The independent reviewer confirmed that the site meets the requirement as validated through ISO 14001-2015 certification.</p>

15. Greenhouse Gas (GHG) Emissions*	Fully meets	<p>Aurubis reports Greenhouse Gas Emissions through the Carbon Disclosure Project. https://www.cdp.net/en/responses/1177</p> <p>Report 2021: https://www.aurubis.com/en/dam/jcr:437e5748-7f77-40ae-8329-749675d8422f/Aurubis_cdp_climate_change_2021.pdf Aurubis has made a commitment to 50% reduction of Scope 1 & 2 emissions and 24% reduction of Scope 3 emissions by 2030 based on a 2018 baseline. These targets are validated by the Science Based Targets Initiative (SBTi). Aurubis is also a signatory to the Business Ambition for 1.5°C.</p> <p>Aurubis is certified to ISO50001 on energy management systems.</p> <p>Commitments are supported by a decarbonization roadmap and specific projects such as energy management.</p> <p>Aurubis has planned and commenced a decarbonization road map at Luenen tied to the corporate roadmap.</p> <p>https://annualreport2020-21.aurubis.com/</p>
16. Energy Consumption	Fully meets	<p>The independent reviewer confirmed that the site meets the requirement as validated through ISO 14001-2015 certification.</p>
17. Freshwater Management and Conservation	Fully meets	<p>Luenen has a water management system covered by ISO 14001-2015. It addresses both use and discharge.</p> <p>The site is essentially self-contained, with water going to a closed water system prior to discharge to municipal wastewater system. Aurubis Luenen is not in a water constrained area, so water supply risks are low. However, there are initiatives in place to reduce the use of water.</p>
18. Waste Management	Fully meets	<p>Luenen has a waste management system covered by ISO 14001-2015 that utilizes the waste hierarchy. Luenen utilizes waste recycling so that process wastes are fed back into the process to minimize the residual wastes for disposal.</p> <p>Waste disposal is regulated under German duty of care laws.</p>

19. Tailings Management	Not applicable	Not applicable to smelters and refiners.
20. Pollution	Fully meets	Aurubis Luenen has water and emissions officers who oversee legal compliance to these heavily regulated areas. There is monitoring data, both in terms of stack emission levels and community emission levels that demonstrate that the plant operates within limits.
21. Biodiversity and Protected Areas	Fully meets	<p>Biodiversity risks are not material at this site with adjacent land being predominantly commercial and residential.</p> <p>A biodiversity impact investigation was carried out in 2009 as part of the planning process for the Luenen expansion. The investigation concluded that none of the project related emissions or discharges exceed relevant limits and that no material disturbance in the soil, water or air ecosystems would be expected.</p>
22. Mine Closure and Reclamation	Not applicable	Not applicable to smelters and refiners.
23. Community Health and Safety	Fully meets	<p>Luenen systematically manages community health and safety, identifying atmospheric emissions and potential emergency incidents as the two highest risks.</p> <p>Emissions and discharges are heavily regulated and monitored.</p> <p>There is regular engagement between the site and the fire services and simulations.</p>
24. Community Development	Fully meets	<p>There is significant evidence of engagement with a range of stakeholders, including the Chamber of Commerce, the Mayor's office and local educational establishments, who tend to be the representatives of local residents. There is consultation between Aurubis and stakeholders on what social projects the communities want. Aurubis undertakes due diligence on the prospective receivers of sponsorship money to ensure their credibility as required by the Corporate Sponsoring Policy. Projects are recommended to the board for final approval.</p> <p>Interviews with stakeholders indicated the site has a good relationship with the community.</p>
25. Artisanal and Small-Scale Mining	Not applicable	There is no artisanal or small-scale mining in the area of influence.
26. Human Rights	Fully meets	Aurubis has publicly committed to following the UN Guiding Principles and the UN Global Compact. There is evidence that management arrangements exist for control of specific human rights issues in the

		workplace and that due diligence is carried in the supply chain.
27. Security and Human Rights	Not applicable	Not applicable to smelters and refiners.
28. Indigenous Peoples' Rights	Not applicable	Evidence provided to demonstrate that there are no indigenous communities in the area of influence.
29. Land Acquisition and Resettlement	Not applicable	Evidence provided to demonstrate that there is no land acquisition and resettlement.
30. Cultural Heritage	Fully meets	<p>Cultural heritage issues are not identified in the risk evaluation process.</p> <p>As the land take footprint is fixed and no land expansions are planned, the possibility of disturbing cultural sites is low.</p> <p>The EIA in 2009/2010 did not identify any impacts on cultural heritage.</p>
31. Due Diligence in Mineral Supply Chains	Partially meets	<p>Luenen has a complex supply chain with hundreds of suppliers covering thousands of transactions of both mined and recycled material per year.</p> <p>Due diligence in mineral supply chains is handled primarily at corporate headquarters.</p>
31.a. Management System	Fully meets	<p>Luenen follows the Aurubis Business Partner Code of Conduct, which is confirmed to be appropriate to the nature, scale, and operational context of the company. This is supported by a policy (available at https://www.aurubis.com/en/downloads) adequate resources and clear roles and responsibilities.</p> <p>There is a system of transparency and controls. Aurubis works with suppliers to gather and collect necessary information and build capacity where appropriate.</p> <p>The due diligence management system includes a process for continuous improvement of due diligence implementation over time, to ensure its implementation.</p>
31.b. Red Flag Identification Process	Fully meets	<p>The company's process to collect, review, and retain information for red flags identification is appropriate to the nature, scale and operational context of the company.</p> <p>There is a system to identify conflict-affected and high-risk areas that is confirmed to be appropriate and consistently yield reasonable results.</p> <p>Red flags related to country of origin have been identified.</p>

31.c. Risk Assessment Process	Partially meets	<p>There is an established process to conduct risk assessments with credible information and identify annex II risks in the supply chain.</p> <p>The following areas for improvement were identified:</p> <ul style="list-style-type: none"> • Adopt a consistent and systematic process to determine the need for on-the-ground risk assessments • Conduct on-the-ground risk assessments for the identified suppliers
31.d. Risk Management Process	Fully meets	<p>There is a risk mitigation action plan which is effective in responding to risks within appropriate timelines. It is appropriate to the type and scale of the risks of adverse impacts and actual adverse impacts and the company's position along the supply chain. Mitigation includes stakeholder engagement in line with the strategy and impacts.</p> <p>It is supported by sufficient resources and implemented consistently.</p> <p>The steps taken by the company to build and/or exercise influence over suppliers are reasonable, given the company position along the supply chain and the risks assessed.</p>
31.e. Public Reporting*	Fully meets	<p>At corporate level, Aurubis reports on the due diligence practices.</p> <p>The following minor area for improvement was identified:</p> <ul style="list-style-type: none"> • Sufficiently report on the concerns related to on-the-ground risk assessments and implementation <p>The Step 5 report is available at https://www.aurubis.com/en/investor-relations/publications/AnnualReports</p>
32. Transparency and Disclosure*	Fully meets	<p>Luenen operations ESG performance are reported in: Sustainability report (published every two years latest was 2019/20)</p> <p>The Annual Report (annual) (including a non-financial sustainability section, the non-financial report, according to the German Commercial Code (HGB)</p> <p>The Environmental report (annual)</p> <p>EMAS statement (annual)</p> <p>Reporting is based on the internationally recognized standards of the Global Reporting Initiative (GRI) and the Sustainability Report includes a GRI KPI</p>

		summary). https://www.aurubis.com/en/responsibility/reporting-kpis-and-esg-ratings
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Conclusions

Statement of conformance	
The site is found to fully meet all applicable criteria of the Risk Readiness Assessment and, for Criterion 31, all applicable conformance criteria of the Joint Due Diligence Standard.	<input type="checkbox"/>
The site is found to fully meet or partially meet all applicable criteria of the Risk Readiness Assessment and, for Criterion 31, all applicable conformance criteria of the Joint Due Diligence Standard. The site has committed to continuous improvement to fully meet all applicable Copper Mark Criteria by 30 June 2023.	<input checked="" type="checkbox"/>
The site is found to miss some or all of the applicable criteria of the Risk Readiness Assessment and / or for Criterion 31, some or all of the applicable conformance criteria of the Joint Due Diligence Standard. The site has committed to continuous improvement to fully meet all applicable Copper Mark Criteria by 30 June 2023.	<input type="checkbox"/>
The site misses some or all of the applicable requirements of the Risk Readiness Assessment and / or for Criterion 31, the applicable criteria of the Joint Due Diligence Standard. The Site has not committed to continuous improvement.	<input type="checkbox"/>
Limitations:	
Additional comments:	

Copper Mark Award

This Summary Report is prepared using data from the independent review report and the independent assessment report. The Copper Mark confirms the assessors' conclusion and awards the Copper Mark as follows

Date the Copper Mark is awarded (dd/mm/yyyy)	21 June 2022
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Expiry Date of the Copper Mark (dd/mm/yyyy)	20 June 2025
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