

# 2019 Aurubis Modern Slavery and Human Trafficking Statement

This slavery and human trafficking statement has been published in accordance with section 54(1) of the UK Modern Slavery Act 2015. It sets out the steps Aurubis took during fiscal year 2018/19 (Oct. 1, 2018 - Sept. 30, 2019) to identify and address modern slavery and trafficking risks.

This statement is published for Aurubis AG and on behalf of the Aurubis Group companies, including Aurubis UK Ltd. Although not all Aurubis Group companies are subject to the Act, Aurubis takes a group-wide approach to its human rights commitments.

Aurubis UK is a precision shearing and metals service center and is part of the Aurubis Group.

## Organizational structure and supply chains

Aurubis AG is a provider of non-ferrous metals that operates worldwide. As an integrated group, we process complex metal concentrates, scrap metals, and metal-bearing recycling raw materials into metals of the highest purity. In addition to our main metal, copper, our metal portfolio also includes gold, silver, lead, nickel, tin, minor metals such as tellurium and selenium, and platinum group metals.

The company is based in Hamburg, Germany, where its headquarters and key production facilities are located. Most of its other sites are located in Europe, with larger production centers in Germany, Belgium, and Bulgaria. Outside Europe, Aurubis also has a production site in the US, and a global sales and service network.

We process copper concentrates, copper scrap, other metal-bearing recycling materials, and bought-in intermediates as feed material. Because we have no stakes in mines, we have to buy the necessary raw materials for our two primary smelters, located in

Hamburg and Pirdop, on the international market. Aurubis has a global, diversified supplier portfolio; we source a significant portion of our copper concentrates from South American countries such as Peru, Chile, and Brazil. We also purchase raw materials from other countries like Bulgaria, Georgia, and Canada. Most of the copper scrap and metal-bearing recycling raw materials for our two secondary smelters in Lünen (Germany) and Olen (Belgium) are sourced from Germany and other EU countries. For primary raw materials, we value long-term relationships and strategic cooperation with our suppliers. Compared to primary raw materials, secondary raw materials are largely purchased on the basis of short-term supply contracts.

## Policies related to slavery and human trafficking

We respect human rights, advocate for their protection, and adhere to the recognized core labor standards set out by the International Labour Organization (ILO). The Executive Board is responsible for the issue of respect for human rights as implemented in our business activities. We have been a part of the United Nations Global Compact since December 2014 and are thus committed to implementing its Ten Principles, including Principle 4, the elimination of all forms of forced and compulsory labor. Our commitment to human rights is included in the [Aurubis Code of Conduct](#) for employees.

In our view, our responsibility to uphold human rights extends to the supply chain. With our business partners, we seek to share the same values and standards in respect of human rights, labor rights, the environment, and business ethics. These standards are outlined in the [Aurubis Business Partner code of conduct](#).

In addition, we include a clause in our – usually long-term – supply contracts in which we state that we expect our suppliers of primary raw materials to follow

not only local laws but also UN sanctions and trade restrictions, as well as UN conventions related to human rights, environmental protection, and safety. This clause is a component of about 80 % of our supply contracts for primary raw materials.

We call on all employees to report any cases of non-compliance with the policies and codes mentioned above to their HR departments or the chief compliance officer. Our employees and business partners can report these types of cases anonymously through our [whistleblower hotline](#) as well.

### **Due diligence processes and risk assessment and management**

Our due diligence in selecting suppliers has been supported by our Business Partner Screening since 2015 and applies to suppliers of both primary materials and secondary materials. The system is implemented at our four key sites, Hamburg, Lünen, Olen and Pirdop, as well as for some smaller sites.

Using this tool, we analyze our business partners in a structured manner with regard to their integrity relating to social and ecological criteria, including modern slavery and human trafficking. The screening is guided by the OECD Due Diligence Guidance for Responsible Mineral Supply Chains.

Our corporate policies on Business Partner Screening establish responsibilities and processes within the

Group. The Procurement and Sales departments are responsible for implementing this screening. We use internally configured software for screening across the Group. It assesses risks related to financial, tax, and criminal law aspects, as well as risks relevant to sustainability, including human rights risks. The result includes a profile that, in the case of increased risk, leads to additional research by the Commercial, Compliance, and Sustainability departments.

Based on this assessment, management decides on possible contracts or restrictions. The Compliance and Sustainability departments regularly repeat the review, with the time interval depending on the risk level that has been determined. New partners are reviewed before any contracts are signed.

The employees responsible for purchasing receive training on the Business Partner Screening. Human rights issues are addressed during this training. The Sustainability and Compliance departments advise the Commercial division during the Business Partner Screening process with regard to human rights and raise awareness for critical issues in this area.

### **Effective action taken to address modern slavery**

For fiscal year 2018/19, we are not aware of any cases of forced labor, modern slavery, or human trafficking related to our operations, business relationships, or supply chains. No cases or complaints were reported through the whistleblower hotline.

The Executive Board Chairman has approved the Aurubis Modern Slavery and Human Trafficking Statement.



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