REFINER COMPLIANCE REPORT GOLD

ASSESSMENT INFORMATION	
Refiner Name:	Aurubis AG – Precious Metals Production
Refiner Location:	Hovestr. 50, 20539 Hamburg
Refiner Contact Person:	
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Assessment Period	01.10.2024 - 30.09.2025
Lead auditor and audit team members	Kaido Katalsepp (LA)
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Date of this report	12.01.26

Aurubis' evaluation

Step 1: Company management systems

Compliance statement with requirement:

We have fully complied with step 1 and established a strong management system.

Has the Refiner adopted a supply chain policy regarding due diligence for supply chains of gold?

Throughout the reporting year, the gold supply management policy, which aligns with the model set out in Annex II of the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas, has been consistently in place and effective. In response to increased regulatory requirements, such as the German Supply Chain Due Diligence Act and Gold Guidance version 9, Aurubis revised its Responsible Sourcing framework. Since October 1, 2022 (updated September 17, 2025), the new Corporate Responsible Sourcing Policy has been implemented and remains effective. This policy includes the "LBMA Gold and Silver Supply Management, and EU-Conflict Minerals Regulation Sub-policy" in Annex 2. The Corporate Responsible Sourcing Policy is formally approved by the Aurubis Supply Chain Committee, which is composed of senior management representatives from Commercial, Corporate Procurement, Corporate Energy & Climate Affairs, Corporate Sustainability, Compliance, Corporate Environmental Protection and Corporate Health & Safety as well as by the Executive Board. The Responsible Sourcing Policy is updated when circumstances change and is reviewed at least annually as part of the Aurubis management review cycle. It is publicly available on our website (https://www.aurubis.com/en/responsibility/responsible-business-activities/responsible-supply-chain). Updates to the Responsible Sourcing Policy are posted on the Aurubis intranet and communicated to all relevant employees through that intranet posting, targeted e-mail updates, and periodic Responsible Sourcing training sessions; the Policy itself is a required module in the Responsible Sourcing training curriculum.

Additionally, we have established a new business partner screening process that combines supplier self-assessment with external data sources, including ESG scores, to enhance due diligence. Our Corporate Responsible Sourcing Policy, along with our internal business partner screening process description, outlines the management system's establishment and our responsibility for conducting risk-based due diligence, screening, and monitoring of transactions and governance structures.

Aurubis has a comprehensive risk management process in place to identify, assess, and manage risks associated with the supply chain. This process includes:

- **Risk Identification:** A risk-based, partly automated, end-to-end supplier and supply chain screening process that includes the identification of suppliers, the supplied material, and the goods and services
- **Risk Assessment:** Collection of relevant data from external sources and questionnaires, supporting documents, and risk assessments of suppliers and the respective supply chain
- **Risk Mitigation:** Engaging with suppliers, relevant authorities, international organizations, civil society, and affected third parties to improve and track performance with a view to prevent or mitigate identified risks

Aurubis aims at preventing or mitigating all potential and actual adverse impacts related to human rights and the general ESG nexus, identified or referred to in i.a. the Annex II of the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk-Areas, the Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc of The Copper Mark, the EU Conflict Minerals Regulation 2017/821, the LBMA Responsible Gold and Silver Guidance, the Responsible Minerals Assurance Process (RMAP) Tin and Tantalum Standard, and the German Supply Chain Due Diligence Act (LkSG). These include the avoidance of harmful environmental influences such as any harmful ground soil contamination, water pollution, air pollution, harmful noise emission, or excessive water consumption. Further Aurubis requires the supplier to operate responsible water stewardship, especially in water scarce and stressed areas. Also, suppliers are required to store, handle, and dispose of hazardous chemicals, including mercury and cyanide, in a responsible manner so that neither the environment nor any person is harmed. Social protections (no forced or child labour; respect for workers' rights; protection of community health, safety and livelihoods; and grievance escalation pathways) and governance safeguards (anti-bribery/anti-corruption, transparency of ownership and origin, and compliance with taxes/royalties/fees) are integral elements of these expectations and are assessed through the Business Partner Screening questionnaires and follow-up engagement.

Has the Refiner set up an internal management structure to support supply chain due diligence?

The internal management system based on above policies is set up to define the governance, roles and responsibilities, internal audit, communication and senior management review.

The Specific Supply Chain Concentrates Responsible (SCR) and the Specific Supply Chain Recycling Responsible (SRR), both appointed by the board, are responsible for the execution and implementation of the Gold and Silver Supply Management Sub-Policy and report directly to the Board.

Aurubis regularly determines and evaluates the risks of money laundering and terrorism financing specific to business operations ("risk analysis"). In the process, risks specific to geography, products, business partners, sales, and transactions of the company's business relationships are observed. Cash transactions generally hold a potentially high risk for money laundering or terrorism financing. Aurubis therefore strictly prohibits cash transactions and this prohibition is governed by an internal Group Policy on Money Laundering Prevention.

To further strengthen and reinforce employee awareness of responsible sourcing and human rights due diligence, Aurubis conducts annual Group-wide training sessions on human rights and compliance, specifically tailored for its metals purchasing buyers. The most recent sessions, held in September 2025, achieved a 100% participation rate.

Training topics relevant to the recent company due diligence and supply chain compliance training include the following:

- The OECD Five-Step Framework for Risk-Based Due Diligence in the Mineral Supply Chain
- Applicable legal and regulatory frameworks, including: Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act (2010); EU Conflict Minerals Regulation (EU Regulation 2017/821); German Supply Chain Due Diligence Act
- Industry and market-specific initiatives, such as: The Responsible Minerals Initiative (RMI) – Tin Supply Chain Program; The London Bullion Market Association’s (LBMA) Responsible Gold and Silver Guidance; The Copper Mark: Joint Due Diligence Standard and Chain of Custody
- Internal standards and procedures, including the Aurubis Responsible Sourcing Management System (RSM System)

Has the Refiner established a traceability system over gold supply chains, including chain of custody mapping and identification of supply chain actors?

Each relevant delivery is registered in SAP system and all relevant information like shipping documents, weight receipts, assays or settlements are centrally stored. All relevant documents are digitized and stored safely. The release for treatment of the lot is done only when all delivery documents are available. In addition to these controls, Aurubis captures a standardized set of core traceability data fields for every lot, including (at minimum): counterparty ID and name; country of origin; mine site; material type and physical form; internal lot/batch number; gross and net weight; assay results; date of arrival; out-turn precious metal content; and shipment/transport references (e.g., bill of lading, packing list number). These data are linked to the digitized source documents (packing lists, commercial and pro forma invoices) within the SAP record. All records and supporting documents are retained indefinitely in the SAP system; there is no fixed retention period, ensuring permanent availability for compliance and audit purposes.

Respect for human rights and the environment has the highest priority for Aurubis in its business activities. Therefore, authority and accountability for the effective oversight of the implementation and continuous improvement of the Supply Chain Due Diligence Program is assigned to the Executive Board of Aurubis. In order to fulfil this task, the Board appoints a committee consisting of senior managers from the following departments: Commercial, Corporate Procurement, Corporate Energy & Climate Affairs, Corporate Sustainability, Compliance, Corporate Environmental Protection and Corporate Health & Safety. This Supply Chain Committee also fulfils the duties of the Human Rights Officer and ensures an annually risk analysis with regard to human rights and environmental risks in the supply chain according to the German Supply Chain Due Diligence Law.

Aurubis has implemented robust due diligence measures, controls, and transparency mechanisms to ensure comprehensive oversight of gold supply chains. This includes stringent traceability protocols and the identification of supply chain actors.

Assay results give each concentrate lot a sufficiently distinctive analytical result that supports indications written on shipping documents. By comparing the overall composition of key major and trace elements in a sample with analytical characteristics from previous samples and indications in contract terms, Aurubis would become aware if any shipped lot assay would divert from this to-be-expected analytics and trigger additional inquiries to guarantee plausibility.

Has the Refiner strengthened company engagement with gold supplying counterparties, and where possible, assisted gold supplying counterparties in building due diligence capabilities?

We have implemented a business partner code of conduct that contains the requirements for our supply chain in alignment with the OECD guidelines and we require our business partners to accept our business partner code of conduct and conclude contractual agreements in that regard. Acceptance of this Code of Conduct is a mandatory prerequisite for every business partner before entering into any business relationship with Aurubis. This obligation is formally laid out in all supply contracts and purchasing agreements, which explicitly reference the Code of Conduct as legally binding.

In addition, Section 3 ("Responsible Sourcing Principles") of the Aurubis Responsible Sourcing Policy sets out explicit counterparty expectations on *Fraudulent Misrepresentation of the Origin of Materials*: Aurubis will resist the solicitation of bribes to conceal or disguise the origin of materials or to misrepresent taxes, fees, and royalties paid to governments in connection with mineral extraction, trade, handling, transport, and export, and suppliers of Primary Materials are expected to act in accordance with relevant initiatives such as the Extractive Industries Transparency Initiative (EITI). The same section also addresses *Payment of Taxes, Fees, and Royalties*: Aurubis will ensure that all such payments due from Aurubis are made to governments and, consistent with our position in the supply chain, commits to disclose these in line with EITI principles.

Aurubis confirms that during the reporting period there were no purchases of mined gold or other precious-metal–containing materials from State-Owned Enterprises (SOEs), nor any first-trade transactions requiring payments to SOEs. Consequently, no EITI-related disclosures of government payment data specific to SOE transactions were applicable.

These requirements are mirrored in the corresponding sections of the LBMA supplier questionnaires that we issue as part of onboarding and ongoing due diligence**.** Where necessary and appropriate, we engage in discussions with our supply chain to discuss and obtain more detailed information and discuss required changes. During such engagements, topics may include origin representation, tax/royalty transparency, and anti-bribery expectations drawn from the Responsible Sourcing Policy and LBMA questionnaires.

Has the Refiner established a company-wide confidential grievance mechanism?

All employees active in the procurement of relevant raw materials have received a dedicated responsible sourcing training, covering these aspects. In addition, more details on rules of procedure are made available on our intranet and public internet approach.

During the reporting period, Aurubis introduced a new whistleblower system to replace the previous whistleblower hotline. The new, digital whistleblower system is available around the clock to employees (groupwide) and external stakeholders. It is based on the Integrity Line from the provider EQS Group AG and is therefore a protected, external application.

The whistleblower system can be accessed at

https://aurubis.integrityline.app/

Reports can be submitted and further direct communication with Aurubis can take place completely anonymously via a secure inbox. This offers the legally guaranteed protection for whistleblowers. The input mask is available in ten languages. The use of the whistleblower system is free of charge

The whistleblower system also serves as the grievance mechanism, allowing employees and external stakeholders to voice concerns over the gold and silver supply chain or a newly identified risk. The grievance mechanism is communicated to business partners in the Code of Conduct for Business Partners.

As stipulated in the responsible sourcing policy, all employees who are in charge of buying gold and silver containing materials can nevertheless raise concerns to the Specific Supply Chain Responsibles and/or the Chief Compliance Officer.

The whistleblower will receive confirmation of the receipt of the grievance / report within seven days and will be informed in an appropriate manner of the follow-up measures taken or planned within three months of receipt of the report, insofar as this is legally feasible. Aurubis treats all grievances / reports confidentially and guarantees the protection of whistleblowers against negative repercussions or punishment after reporting risks and violations. All grievances / reports are investigated.

Insights and learnings derived from complaints and reports are integrated into Aurubis' risk assessment and continuously inform the policies and processes, including the publicly available Responsible Sourcing Policy. Aggregated findings and lessons learned are shared more broadly through internal trainings and regular updates from the Chief Compliance Officer to the Board.

Further reporting channels as well as the process steps of grievance / report resolutions are defined in the rules of procedure.https://www.aurubis.com/en/Responsibility/whistleblower-hotline

During the previous reporting period, Aurubis received a grievance about violations of human rights and environmental standards at a supplier of copper concentrate. In response, the Chief Compliance Officer initiated the complaint procedure, including an enhanced due diligence process, review of relevant documentation, initiation of an investigation and coordination of stakeholder engagement. The investigation remains ongoing in the current reporting period and an on-site investigation is currently being planned and scheduled for the beginning of 2026. The grievance received and reported in the prior reporting period therefore has not yet been resolved.

The procedure is expected to be completed by March/April 2026; however, the conclusion of the process also depends on a regulatory decision. Once the investigation and complaint procedure have been completed, any measures agreed with the supplier, if necessary, will be monitored at regular intervals.

Step 2: Risk identification and assessment

Compliance statement with requirement:

We have fully complied with step 2 and have identified and assessed risks in the supply chain.

Does the refiner have a process to identify risks in the supply chain?

A Risk Identification and Risk Management Process is in place and described in detail in our Responsible Sourcing Policy (under 4.2.)

Our risk identification and risk management process to prevent, or mitigate potential or actual adverse impacts is a risk-based, partly automated, end-to-end supplier and supply chain screening process that includes the identification of a supplier, if applicable the indirect supplier (e.g. source of the Material), the supplied Material or the Goods and Services, the collection of relevant data from external sources and e.g. questionnaires, supporting documents, the risk-assessment of the supplier and the respective supply chain, the risk management, and the reporting.

The due diligence process is carried out before entering a business relationship with a new business partner. The relevant due diligence checks and investigations are repeated during the business relationship at intervals corresponding with the individual risk or whenever changes regarding the risk of e.g., human rights violations or ESG offences become known.

When Aurubis identifies any of the aforementioned risks it will engage with its suppliers, relevant authorities, international organizations, civil society, and affected third parties, as appropriate, to improve and track performance with a view to prevent or mitigate these risks within the supply chain. Aurubis will suspend or discontinue its engagement with upstream suppliers after failed attempts at mitigation for any of these risks defined above.

Does the Refiner assess risks in light of the standards of their due diligence system?

At Aurubis, the responsibility for fulfilling the specific processes for meeting due diligence in procurement lies with the purchasing departments, more specifically the Commercial department for our metals' purchases. Supply chain due diligence is detailed in our Corporate Responsible Sourcing Policy and comprises all measures required by the LBMA Responsible Gold Guidance. Initial due diligence processes are carried out prior to entering new business relationships. Further due diligence processes are conducted during the business relationship, including at intervals corresponding to individual adverse impacts or whenever there is knowledge of changes regarding adverse impacts, such as human rights violations or ESG issues.

The Compliance and Corporate Sustainability departments are involved in risk assessment for business partners. This assessment focuses on respect for human rights, governance, as well as environmental aspects. The processes and management systems that business partners use to reduce the relevant adverse impacts are evaluated. Additionally, results from external data sources are assessed to identify potential risks (including sanctions, incidents relevant to human rights or governance, adherence to guidelines, financial stability) linked to the respective business partners. The Corporate Environmental Protection and Corporate OHS departments are involved in the risk assessment on an event-driven basis. In addition to ongoing supplier monitoring, Aurubis performs transaction-level monitoring through its Business Partner and Supply Chain Screening Process. Each shipment is registered in SAP and linked to digitized source documents (e.g., invoices, packing lists, bills of lading). Before release for processing, all delivery documents are verified for completeness and consistency. Transactional data such as weight, origin, routing, and payment details are cross-checked against master data and risk indicators. This process enables detection of anomalies or red flags (e.g., unusual routing, discrepancies in documentation, payment irregularities) and triggers further investigations where required.

Furthermore, our Supplier Base and Master Data Review (as described in the Business Partner and Supply Chain Screening Process) ensures continuous risk review based on transactional data. On a quarterly basis (at minimum annually), we cross-check business partner information—including BP name and number, material description, commodity group, country of origin, and activity status—against our due diligence platform and external sources. Updates to master data (e.g., address changes, UBO changes, NACE code updates) are incorporated to maintain accurate risk profiles. If potential or actual adverse impacts on human rights or the environment are identified during the risk assessment, measures are formulated to increase the level of information on the potential risks, to mitigate specific risks, or to prevent, terminate or minimize the scope of the adverse impact. The measures are formulated by the Corporate Sustainability and Compliance departments, and the Purchasing departments communicate them to suppliers. Aurubis will engage with its suppliers, relevant authorities, international organizations, civil society, and affected third parties, as appropriate, to improve and track performance with a view to prevent or mitigate these risks within the supply chain. Aurubis will suspend or discontinue engagement with upstream business partners after failed attempts at mitigation for any of the identified risks/issues.

During the reporting period, no instances of zero-tolerance non-conformities were identified across the assessed suppliers (0% occurrence rate). One LBMA-relevant supplier was initially classified as high risk due to ESG risks associated with its country of origin and industry. However, as the material supplied was assessed as low risk, no EDD measures were deemed necessary. No red flags were confirmed in the reporting period.

Has the Refiner undertaken EDD measures for identified high-risk supply chains?

The risk identification and risk management process to display, prevent, or mitigate the ESG impacts is a risk-based, partly automated, end-to-end supplier and supply chain screening process. The collection of relevant data from external sources and e.g. questionnaires, supporting documents, the risk-assessment of the supplier and the respective supply chain, the risk management, and the reporting are part of the risk management process.

As Aurubis continuously conducts risk assessments via the business partner screening process, the necessity to perform ad-hoc on-the-ground-assessment as part of further risk assessments or action for remedy may arise at any moment and may therefore, be based on the findings as well as be prioritized on the list of selected suppliers that shall undergo on-the-ground-assessment.

At Aurubis, a job description provides a clear understanding of the subject matter expertise needed for the implementation of the management systems/due diligence process. Also, a clear objective system of promotion is in place to ensure that the staff managing and implementing the management systems/due diligence process have the required subject matter expertise. As such, the on-the-ground-assessments are conducted by the employees of the Aurubis' Corporate Sustainability department, who possess the necessary skills and expertise in the conduct and setup of supplier audits and relevant risks, accompanied by an employee from the Commercial department. After determining the thematic scope of the assessment and depending on the required specific knowledge, skills, and capacities, employees of other departments might also get involved. If Aurubis does not possess the required capacity inhouse, an independent auditor/assessor with respective skills and knowledge will be commissioned.

Since Aurubis conducts risk assessments via the business partner screening on a continuous basis, the necessity to perform ad-hoc on-the-ground-assessment as part of further risk assessments or action for remedy may arise at any moment and may therefore, be based on the findings as well as be prioritized on the list of selected suppliers that shall undergo on-the-ground-assessment. The need for on-the-ground assessments is established in accordance with the Aurubis' Corporate Responsible Sourcing Policy and prioritization procedure and is based on a combined assessment of several criteria. These include the identification of potential or actual adverse impacts; operations in conflict-affected and high-risk areas (CAHRAs); uncertainty or complexity regarding the origin of the material; ownership structures; general ESG performance and commitments of the supplier, the requirement for follow-up visits based on findings from previous on-the-ground assessments; and the need for increased oversight and support in relation to suppliers' improvement plans.

The results of on-the-ground-assessments are valid for three years at the moment of report submission. Validity may be annulled prematurely by severe findings contradicting or at least seriously questioning the OTGA's results.

Where it is not possible to conduct mandatory on-the-ground-assessments an external auditor/ assessor will be commissioned to conduct the assessment. Moreover, for specific supply chains and whenever deemed necessary according to the risk profile – Aurubis looks for third party audits in particular to ensure the appropriate implementation of the Aurubis due diligence practices for responsible supply chains from conflict-affected and high-risk areas. These audits include all activities, processes, and systems used by Aurubis to implement supply chain due diligence from conflict- affected and high-risk areas. This includes relevant policies and procedures, Aurubis controls over respective supply chains, communications with actors in these supply chains, the information disclosed to downstream companies on suppliers, chain of custody, and other traceability information, Aurubis risk assessments including, if applicable, the onsite research and Aurubis strategies for risk management.

During the reporting period, on-the-ground-assessments were conducted by the Aurubis' employees at one of our targeted, long-term primary concentrate business partners, which was however not a high risk supplier, to gain a direct understanding of operational conditions on site. As a result, the current practices and processes were found to meet the required standards, and no need for an improvement plan was deemed necessary.

The scope of the on-the-ground-assessments is defined case by case. Definition may be dependent on supplier-location specific abstract risks, indications of potential adverse impacts resulting from evaluation of assessment questionnaires, delivered sub-supply. Overall, one LBMA-relevant supplier was initially classified as high risk due to ESG risks associated with its country of origin and industry. However, as the material supplied was assessed as low risk,, no EDD measures were deemed necessary

Does the Refiner report risk assessment to the designated manager?

Aurubis' Specific Supply Chain Responsibles (SSCR) receive reports from designated representatives from Primary Raw Materials and Recycling Raw Materials departments on a regular basis to support them in their duties. The SSCRs themselves report in their function a review report directly to the board. Senior Management must approve all new suppliers and retain the ultimate control and responsibility for the decision to start or continue a business relationship.

Step 3: Risk Management

Compliance statement with requirement:

We have fully complied with step 3 and designed and implemented a management system to respond to identified risks.

Does the Refiner have a process to respond to the identified risks by either (i) mitigating the risk while continuing to trade, (ii) mitigating the risk while suspending trade or (iii) disengagement from the risk?

Aurubis expects its business partners to comply with the fundamental conventions of the International Labor Organization (the ILO), the United Nations' Universal Declaration of Human Rights, and with applicable national and local laws and regulations. We only want to do business with partners who aspire to our own environmental, social, and governance standards and who are fully committed to contributing to our sustainability ambition.

As such, Aurubis will engage with its suppliers, relevant authorities, international organizations, civil society, and affected third parties, as appropriate, to improve and track performance with a view to prevent or mitigate these risks within the supply chain. Aurubis will not start or continue engagement with upstream suppliers after failed attempts at mitigation for any of these risks.

Aurubis overarching risk analysis considers country risks and sector-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 Business Partner Screening, the control assessment refers to the individual assessment of business partners to identify the specific risks.

If the business partner screening identifies potential risks or concrete violations of human rights, measures are developed to increase the degree of information on the potential risks, improve the supplier's sustainability performance, or reduce the concrete risks.

The Corporate Sustainability and Compliance departments 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 departments conducting the review deem necessary, 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, the business relationship is either not pursued any further or terminated. In the next step of the 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.

No instances of disengagement with counterparties occurred during the reporting period and no cooperation with national or local government authorities was deemed necessary based on the results of the risk assessment.

The Executive Board of Aurubis has been assigned authority and accountability for the effective oversight of the implementation and continuous improvement of our Supply Chain Due Diligence Management System. To fulfil this task, the Board has appointed a committee consisting of senior representatives from the following departments: Commercial, Corporate Procurement, Corporate Energy & Climate Affairs, Corporate Sustainability, Compliance, Corporate Environmental Protection and Corporate Health & Safety. Regularly, and at a minimum annually, the committee reports to the Executive Board, in the framework of the risk management process on the results of the risk assessment, identified risks and prevention / mitigation strategies, as well as progress and effectiveness of improvement plans.

Step 4: Independent third-party audit

Compliance statement with requirement:

We have fully complied with Step 4 of the LBMA Gold Guidance by arranging an independent third-party audit of our supply-chain due-diligence system.

In accordance with LBMA requirements for audit firm rotation, Arche Advisors was appointed as the new assurance provider for the LBMA independent third-party audit. The selection followed a structured review of the LBMA list of Approved Service Providers and a competitive request-for-proposal process. The decision was discussed in the Supply Chain Committee and subsequently approved by the Board.

To safeguard assurance provider independence, the Supply Chain Committee conducted a thorough review, including conflict-of-interest checks and confirmation that Arche Advisors does not provide any non-assurance services to Aurubis that could impair independence. The Committee documented these findings and presented them to the Board as part of the approval process. Based on this information, the Board formally approved the appointment, ensuring compliance with LBMA requirements and best practices for auditor independence.

This compliance report will be published in full on the Aurubis website under the following link: https://www.aurubis.com/en/products/other-metals/gold

Step 5: Report on supply chain due diligence

Compliance statement with requirement:

We have fully complied with step 5 and reported on supply chain due diligence.

Further information on our systems, targets and fulfillments with regards to our supply chain can be found in the annual report and specifically the nonfinancial report and on our company website at https://www.aurubis.com/en/investor-relations/publications

Aurubis' overall conclusion

Management conclusion

Is the Refiner in compliance with the requirements of the LBMA Responsible Gold Guidance for the reporting period?

Yes, in conclusion, Aurubis implemented effective management systems, procedures, processes and practices to conform to the requirements of the LBMA Responsible Gold Guidance, as above explained for the reporting year ended 30 September 2025.

Aurubis is committed to continuous improvement, and any further corrective actions identified will be monitored internally on a regular basis.

Aurubis AG

Martin Sjoberg

Senior Vice President Commercial

Specific Supply Chain Concentrate Responsible

Hannu Heiskanen

Vice President MMR

Specific Supply Chain Recycling Responsible