

# INDEPENDENT LIMITED ASSURANCE ENGAGEMENT REPORT

*On the Aurubis Beerse NV Public Due Diligence Report for Responsible Sourcing (Reporting Year 2024)*

## 1. Assurance Conclusion

*Based on the work performed for this assurance engagement and the evidence obtained, nothing has come to our attention that causes us to believe that the assertions made in the Aurubis Beerse NV Public Due Diligence Report for Responsible Sourcing for the reporting period 1 January 2024 – 31 December 2024 are not prepared, in all material respects, in accordance with the requirements of ITA Tin Code Standard 7.3 and the ITA–RMI Assessment Criteria for Tin Smelting Companies (Version 2, 25 March 2021)*

## 2. Date and Period of Assessment

Date of assurance report	11.04.2026
Addressee Company name and registered address	Aurubis Beerse NV, Nieuwe Dreef 33, 2340 Beerse, Belgium
Level of assurance engagement	Limited assurance, conducted in accordance with ISAE 3000 (Revised)
Period covered by assessment	1 January 2024 – 31 December 2024

## 3. Author of the Assurance Report

Name and address of auditor and assurance firm authoring this report	ARCHE Advisors, Inc., 50 East 100 South, Ste. 201, St. George, Utah 84770, USA. Lead Auditor: Kaido Katalsepp
Qualifications, experience and independence of assurance firm	ARCHE Advisors, Inc. operates a quality management system consistent with ISQC 1/ISQM 1 and conducts all non-financial assurance engagements under ISAE 3000 (Revised). The firm confirms compliance with the IESBA Code of Ethics (Parts A and B), including independence, integrity, objectivity, and professional competence.
Qualifications, experience and independence of auditor	Lead Auditor Kaido Katalsepp has 14 years of international auditing experience, including responsible minerals due diligence, RMAP, LME, LBMA, Copper Mark, and ITA Tin Code 7.3 assessments. APSCA CSCA certified. The auditor confirms full independence and adherence to the IESBA Code.

## 4. Assurance Firm Responsibilities

**ARCHE Advisors, Inc.** is responsible for:

- *conducting the assurance engagement in accordance with **ISAE 3000 (Revised)***
- *applying appropriate methodologies to verify the accuracy of the company's assertions*
- *evaluating the completeness, consistency, traceability, and accuracy of information used in the company report*
- *identifying misstatements or limitations that may affect the assurance conclusion*
- *preparing this assurance report in accordance with ISAE 3000 and ISQC 1/ISQM 1*

## 5. Company Responsibilities

**Aurubis Beerse NV** is responsible for:

- *preparing the Public Due Diligence Report*
- *implementing due diligence processes aligned with ITA Tin Code Standard 7.3*
- *providing complete and accurate information to the assurance firm*
- *correcting any material misstatements identified during the engagement*
- *Step 4A – Planning of the audit*  
*The company ensured that the audit was planned and performed with appropriate scope and criteria. No CAHRA supply chains existed in 2024; therefore, no upstream CAHRA consultations were required.*
- *Step 4B – Implementation of the audit*  
*The company provided full access to documentation, personnel, and systems necessary to perform the assurance engagement.*

## 6. The Subject Matter

*The subject matter comprises Aurubis Beerse NV's responsible sourcing due diligence system and related disclosures for the period 1 January–31 December 2024, assessed against the ITA Tin Code Standard 7.3. This includes evaluation of the company's policies, management systems, risk assessments, risk mitigation measures, traceability and chain-of-custody controls, third-party audit participation, and annual reporting, as described in the Public Due Diligence Report and supporting corporate policies.*

## 7. The Assessment Criteria

*The assessment was performed against the applicable Standards of the ITA Tin Code, including Standard 7.3 on Responsible Sourcing. The specific criteria used for evaluating Aurubis Beerse NV's conformance with Standard 7.3 are the International Tin Association (ITA) – Responsible Minerals Initiative (RMI) Assessment Criteria for Tin Smelting Companies (Version 2, 25 March 2021).*

## 8. Summary of Work Performed

*The assurance engagement included:*

- **Document review:** policies, procedures, CAHRA methodology, supplier due diligence files, BPSC/Osapiens screening outputs, training records, contracts, transport documents, certificates of origin, mass balance records
- **Site visit:** observation of inbound material reception, QC checks, sampling, storage, labeling, and traceability
- **Interviews:** procurement, responsible sourcing, compliance, sustainability, logistics, commercial, and finance personnel
- **Sampling:** supplier files, transactions, and traceability documentation
- **Risk & materiality assessment:** based on supplier universe, material types, and due diligence risk exposure
- **Verification of RMAP audit participation**
- **Review of the company's Step 5 public report**

## 9. Summary of Findings

IV:a to IV:f – Use of an Aligned Joint Initiative (JI) or Institutionalised Mechanism (IM)	<b>Not applicable, as Aurubis Beerse NV does not use any aligned Joint Initiative or Institutionalised Mechanism in its responsible sourcing due diligence system.</b>
Step 1A - Adopt and Commit to a Supply Chain Policy	<b>Conformant with Opportunities for Improvement</b> The Corporate Responsible Sourcing Policy is broadly aligned with the OECD Annex II model; however, it does not yet specify explicit timescales for risk response. Defining clear expectations for immediate disengagement in cases of severe abuses and outlining mitigation periods for other risks would strengthen alignment with OECD guidance.
Step 1B - Structure Internal Management System to Support Supply Chain Due Diligence	<b>Conformant with Opportunities for Improvement</b> While governance structures are established, the definition, assignment, and communication of responsibilities between corporate and site levels are not consistently explicit. Enhancing clarity around ownership of key due-diligence activities would support more consistent operational implementation.
Step 1C - Establish controls and transparency over the supply chain	<b>Conformant</b> Aurubis Beerse has established and consistently applies documented controls that ensure transparency over its tin supply chain. Supplier onboarding includes KYC, beneficial ownership checks, SAQs, sanctions screening, and CAHRA classification, all processed through the BPSC workflow. As noted in the report, the auditor reviewed “Supplier Self-Assessment Questionnaires (SAQs), KYC documents and beneficial ownership screening, country risk screening outputs and CAHRA classification,” confirming these controls were complete and up to date. Traceability is supported by comprehensive transaction-level documentation—“purchase orders, contracts, bills of lading, CMRs, delivery notes, certificates of origin, and inbound material reception documents”—which allowed verification of declared origins and material flows. On-site observations confirmed that inbound material controls (IK 366 and IK 372) are implemented in practice, and upstream smelters were verified as RMAP-conformant. Together, these measures demonstrate that Aurubis Beerse maintains effective supply-chain transparency in line with Step 1C requirements
Step 1C:1-4 – CAHRA mineral and supplier information requirements	<b>Not applicable (no CAHRA supply chains in 2024)</b>

<p>Step 1D – Structure internal management system to support supply chain due diligence</p>	<p><b>Conformant</b></p> <p><i>Aurubis Beerse has a clearly defined internal management structure that supports effective implementation of supply chain due diligence. Roles and responsibilities for procurement, responsible sourcing, compliance, sustainability, logistics, commercial operations, and finance are formally documented and were confirmed through interviews with relevant personnel. The auditor reviewed “governance and management structure charts showing responsible sourcing, procurement, compliance, sustainability, commercial, and finance functions,” demonstrating clear accountability and oversight. The company maintains documented procedures—including the Responsible Sourcing Policy, Human Rights &amp; Environmental Due Diligence Process Descriptions, CAHRA Identification Procedure, and BPSC workflow—which guide consistent execution of due diligence tasks. Training records reviewed during the engagement confirmed that relevant staff had received responsible sourcing training. Together, these elements show that Aurubis Beerse has an established and functioning management system that supports ongoing due diligence in line with Step 1D requirements.</i></p>
<p>Step 1E – Establish company level grievance mechanism</p>	<p><b>Conformant</b></p> <p><i>Aurubis Beerse maintains a company-level grievance mechanism that is accessible, documented, and integrated into its broader compliance and responsible sourcing system. The auditor reviewed the Corporate Responsible Sourcing Policy, Compliance Policy, and Human Rights &amp; Environmental Due Diligence Process Descriptions, all of which reference established channels for raising concerns. Interviews with personnel confirmed awareness of these mechanisms, and the company’s governance structure—“showing responsible sourcing, procurement, compliance, sustainability, commercial, and finance functions”—supports clear escalation pathways. These elements demonstrate that Aurubis Beerse has an operational grievance mechanism consistent with Step 1E requirements.</i></p>
<p>Step 2A – Identify scope of Annex II risk assessment (RA) through red flag review (RFR)</p>	<p><b>Conformant</b></p> <p><i>Aurubis Beerse conducts a structured red-flag review to determine the scope of its Annex II risk assessment, using documented procedures and systematic screening tools. As noted in the report, the auditor reviewed “country risk and CAHRA classification results using the TDI CAHRA Index, confirming no CAHRA-linked supply chains for 2024,” alongside supplier SAQs, KYC files, and beneficial ownership checks. The BPSC workflow ensures that red-flag indicators—related to geography, supplier type, material characteristics, and upstream smelter information—are assessed consistently. Upstream smelters were also verified as RMAP-conformant. These combined controls demonstrate that Aurubis Beerse effectively identifies whether Annex II risks may be present and appropriately defines the scope of further risk assessment activities</i></p>
<p>Step 2B – Map circumstances of the company supply chain through traceability and on the ground assessment team (OGAT)</p>	<p><b>Not applicable (no CAHRA supply chains in 2024)</b></p>
<p>Step 2C – Assess Annex II risks in the supply chain</p>	<p><b>Not applicable (no CAHRA supply chains in 2024)</b></p>
<p>Step 3A – Report risk findings to senior management</p>	<p><b>Not applicable (no CAHRA supply chains in 2024)</b></p>
<p>Step 3B – Devise and adopt a risk management plan</p>	<p><b>Not applicable (no CAHRA supply chains in 2024)</b></p>
<p>Step 3C – Implement the risk management plan</p>	<p><b>Not applicable (no CAHRA supply chains in 2024)</b></p>

## 10. Company Report

The assurance engagement covered the Aurubis Beerse NV Public Due Diligence Report for Responsible Sourcing (2024).  
The company has implemented annual reporting in accordance with Tin Code Standard 7.3.

## 11. Limitations (if appropriate)

The assurance engagement was limited to the reporting period 2024.

- Material received in 2025 could not be assessed retrospectively for 2024 reporting.
- No CAHRA supply chains existed; therefore, CAHRA-specific procedures were not applicable.

These limitations do not affect the assurance conclusion

## 10. Restrictions on Use of the Report

This assurance report has been prepared for the purpose of demonstrating Aurubis Beerse NV's compliance with the International Tin Association (ITA) Tin Code Standard 7.3, as agreed between the company and the assurance provider. The report may also be used by interested downstream parties to support their own due diligence, tin sourcing assessments, and compliance efforts in accordance with Articles 4, 5 and 7 of Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017.

The report is not intended for use in demonstrating compliance with any other legal, regulatory, or tax requirements in any jurisdiction. Any additional use, reliance, or distribution of this report requires prior agreement between Aurubis Beerse NV and the assurance provider.

## 11. Statement on the Accuracy of Information

Based on the procedures performed, the information presented in the company's Public Due Diligence Report for 2024 is, in our opinion, **accurate in all material respects**.

## 12. Additional Measures (optional)

No additional measures outside the scope of ITA Tin Code Standard 7.3 were conducted.

Signature	<b>Kaido Katalsepp</b> Lead Auditor ARCHE Advisors, Inc. 
Location	Tallinn, ESTONIA 11.04.2026

## Public Due Diligence Report for Responsible sourcing

Date: April 2<sup>nd</sup> , 2026

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 mainly 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 primary materials and diverse recycling raw materials. Aurubis is the global leader for copper recycling.

### Tin Code Standard 7.3 Assessment

Aurubis Beerse has been third-party assessed against the ITA-RMI Assessment Criteria for Tin Smelting Companies (version 2, March 2021) on November 3-4, 2025, for audit period 1/1/2024 – 12/31/2024. The

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Belgium

Company registration number  
0403.075.580  
VAT No. BE 0403 075 580  
RPR Antwerpen, division Turnhout

Bank details  
IBAN BE86 2300 5280 0150  
BIC GEBABEBB

assessment has been carried out by Arche Advisors (Mr. K. Katalsepp). Responsible Sourcing Assurance reports are published on the Tin Code website:

<https://tincode.org/tin-code-reports/responsible-sourcing-assurance/>

### **RMAP Assessment Summary**

Previous assessment against the Tin and Tantalum Standard (2017) under the Responsible Minerals Assurance Process (RMAP), took place on March 4-5, 2025 and March 11-12, 2025 at Aurubis Beerse and Aurubis Berango respectively, for the audit period 1/1/2024 – 12/31/2024. UL Responsible Sourcing carried out the assessments (lead auditor: Mr. P. Denoize, co-auditor: Ms. R. Kondrateva). 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 is scheduled on 26-28 January, 2026 in Beerse and 3-4 February, 2026 in Berango for the assessment period 1/1/2025 – 9/30/2025.

### **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 implement corresponding due diligence processes in order to identify, prevent and mitigate said risks in our supply chain. 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:83be7fa4-15fe-49ea-97d8-649b8942aef4/RSP\\_2024\\_final\\_version.pdf](https://www.aurubis.com/dam/jcr:83be7fa4-15fe-49ea-97d8-649b8942aef4/RSP_2024_final_version.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. Hans Van de Water 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 the purchasing department to increase awareness towards Responsible Sourcing in the supply chain. Four training sessions have been organized in August - September 2025 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.

Aurubis' expectations on responsible sourcing and compliance with the OECD Guidance are also communicated to all direct suppliers through the Business Partner Code of Conduct. To fulfill our due diligence obligation with regard to all of our material topics in the supply chain area, Aurubis has implemented a Business Partner and Supply Chain Screening process.

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 grievance mechanism. 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 7 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 **Business Partner and Supply Chain Screening** is the process implemented to identify, manage, and monitor supply chain risks.. Before contracting and conducting business with a new supplier, the supplier must go through the screening process in the Business Partner Screening (BPS) tool according to ESG, Compliance, and Tax risk considerations.

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

As part of the Aurubis Human Rights and Environmental Due Diligence System, Aurubis has an approach to **identify "Conflict Affected and High-Risk Areas" (CAHRAs)** and to identify red flags in the supply chain. Aurubis' CAHRA list is coherent to the TDI CAHRA Index, EU CAHRA list, Dodd Frank Act country list, among others. This list will be applicable to the country of origin and transit routes and information which is indicated upon onboarding of new business partners.

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Supplier location and material combinations assigned a medium or high-risk level require further due diligence as defined in Aurubis Human Rights and Environmental Due Diligence System.

#### Risk assessment Aurubis Beerse & Berango

The majority of materials sourced comes from secondary sources.

Aurubis also purchases by-products from other smelters, which do not fall under the definition of secondary material and are considered intermediate material. Aurubis purchases these materials only from RMAP conforming smelters. For those supply chains of intermediate material determined to be medium or high-risk, further due diligence has been conducted in accordance with the Aurubis Human Rights and Environmental Due Diligence System,

**Aurubis Beerse:** in the assessment period 1/1/2025 – 9/30/2025, no primary material has been sourced directly from smelters located in a CAHRA according to Aurubis' CAHRA procedure. No red flags as outlined in Annex II of the OECD Minerals Guidance were substantiated or confirmed.

**Aurubis Berango:** in the assessment period 1/1/2025 – 9/30/2025, no primary material has been purchased from sources located in a CAHRA. No red flags as outlined in Annex II of the OECD Minerals Guidance were substantiated or confirmed.