

Information on data protection for shareholders and their proxies regarding data processing for the purposes of the Annual General Meeting

In this Data Privacy Statement, Aurubis AG provides information about the personal data of shareholders or their proxies processed by Aurubis AG in connection with the organization, execution and follow-up of the Annual General Meeting and about the rights of shareholders and their proxies in accordance with Regulation (EU) 2016/679 (General Data Protection Regulation — GDPR) and the Federal Data Protection Act (BDSG) regarding the processing of their data.

A. CONTROLLER

As the controller within the meaning of Article 4 (7) GDPR, Aurubis AG, represented by the members of its Executive Board, processes personal data.

B. CATEGORIES OF DATA PROCESSED

In connection with the Annual General Meeting, Aurubis AG processes the following personal data of shareholders:

- » First and last name, title if applicable, date of birth
- » Address and additional contact information
- » Data related to shares and shareholder (in particular number of shares, type of share ownership, depository bank)
- » Individual access data for the InvestorPortal
- » Other data provided in connection with the Annual General Meeting (e.g., powers of attorney, requests for information, motions, nominations)

Aurubis AG also processes, if applicable, the first and last name and the address of the proxy.

Insofar as shareholders or their proxies contact Aurubis AG, Aurubis AG will also process the personal data required to respond to the respective request, such as email address or telephone number.

Aurubis AG collects data about access to the InvestorPortal when shareholders or proxies visit the InvestorPortal online. The following data and device information can be recorded in the webserver log files:

- » Data retrieved or requested (e.g., screen resolution)
- » Date and time of retrieval
- » Notification of whether the data retrieval was successful
- » Type of web browser and operating system used
- » Referrer URL (page previously visited)
- » IP address
- » Only for shareholders or proxies: shareholder number and session ID/admission ticket number
- » Login

The browser automatically transmits this data to Aurubis AG when the InvestorPortal is visited.

Aurubis AG also uses web storage functions. Refer to the additional information under “E. Cookies and other similar items” regarding these functions.

C. DATA SOURCES

Aurubis AG or the service providers commissioned by Aurubis AG receive the personal data of the shareholders either from the shareholders themselves or from the depository banks of the shareholders who have commissioned them to hold the shares.

If a proxy acts for a shareholder, Aurubis AG receives the personal data from the shareholder who granted the proxy or directly from the proxy, insofar as it relates to conduct at the Annual General Meeting.

D. PURPOSES AND LEGAL BASIS OF DATA PROCESSING

Voting rights can be exercised via proxies, and proxy authority can be delegated via the InvestorPortal.

Shareholders or their proxies must log in with the access data they receive with the voting rights card in order to be able to use the InvestorPortal. The use of the InvestorPortal is subject to the terms and conditions of use available there.

Organization, execution and follow-up of the Annual General Meeting

Aurubis AG processes personal data for the purposes of organizing, executing and following up on the Annual General Meeting, and to fulfill the legal obligations towards shareholders and their proxies in this context, in particular in order to

- » enable shareholders and their proxies to exercise their rights within the scope of or in connection with the Annual General Meeting (in particular the invitation and registration for the Annual General Meeting, issue of admission tickets, enabling the exercise of voting rights and other rights, the granting of power of attorney and instructions and their revocation, and processing any shareholder concerns in the respective manner described in the invitation convening the Annual General Meeting).

The legal basis for processing this data is Article 6 (1) (c) of the EU General Data Protection Regulation (GDPR) in conjunction with Section 67e (1) of the German Stock Corporation Act (AktG) and the obligations under stock corporation law pursuant to Sections 118 et seq. AktG.

The processing of personal data is required for the orderly execution of the Annual General Meeting. If shareholders or their proxies do not provide Aurubis AG with the required personal data, Aurubis AG may not be able to enable these persons to exercise shareholder rights or to participate in the Annual General Meeting.

In connection with the Annual General Meeting, Aurubis AG may also transmit the personal data to legal advisors, tax consultants, or auditors, as Aurubis AG has a legitimate interest in executing the Annual General Meeting in accordance with the relevant legal requirements and in obtaining external consultation in this context. The legal basis for processing this data is Article 6 (1) (f) of the EU General Data Protection Regulation (GDPR).

Fulfillment of statutory reporting and publication obligations (in particular voting rights announcements) and other legal obligations, in particular retention obligations

In addition, the personal data is also processed to comply with other legal obligations, such as statutory reporting and publication obligations (in particular voting rights announcements) and regulatory requirements as well as stock, commercial and tax legislation retention requirements. In order to comply with regulations, for example when authorizing the proxies nominated by Aurubis AG for the Annual General Meeting, the data that serves as proof of proxy must be verified and recorded and kept access protected for three years (Section 134 (3) sentence 5 AktG). The legal basis for processing in this case is under the respective regulations in conjunction with Article 6 (1) (c) GDPR.

Additional processing purposes

In individual cases, Aurubis AG also processes personal data for the purpose of safeguarding legitimate interests in accordance with Article 6 (1) (f) GDPR. In addition, based on legitimate interests, the personal data may also be used to compile statistics, e.g., to analyze trends, or to enforce, exert or defend against legal claims. This serves our legitimate interest in analyzing the company's capital structure as a basis for business decisions.

If participants enter the recording area while the speeches live-streamed on the internet are being recorded, their images will also be recorded by the live stream or recording since interested shareholders and the public are able to watch the speeches online.

Processing on the basis of legitimate interests only occurs if this is not outweighed by the interests or basic rights of the shareholders and their representatives with regard to protecting their personal data.

If there is intent to process the personal data for another purpose, Aurubis AG will inform the shareholders and their proxies in advance within the scope of the legal provisions.

E. COOKIES AND OTHER SIMILAR ITEMS

Aurubis AG uses device information in web server log files and web storage and local storage elements (collectively "cookie functions") for the InvestorPortal. For web storage functions, this involves the storage of small text files in the browser's local memory on the terminal device. As part of session storage technology, information about the respective authentication token and session data, including the granting of consent to the Terms of Use, is collected after login. This allows users to be recognized if they need to return to another page of the InvestorPortal or the Aurubis AG website, or have to reload a page during an active session. In

addition, the local storage function is used in the operation of the InvestorPortal to store the login timestamp, which enables automatic logout after 30 minutes of inactivity for security reasons.

This data is automatically erased when the browser is closed. The browser menu contains information on how to technically disable permission for web storage objects and what settings the browser uses to inform users about the placement of a new web storage object. Please note that some website functions may no longer be available if web storage objects are deactivated.

The cookie functions used by Aurubis AG are only used for the purposes of making the InvestorPortal available, for registering and identifying shareholders, and for detecting misuse, troubleshooting and ensuring the trouble-free technical operation of the Annual General Meeting.

The legal basis for the use of the cookie functions, access to the data stored therein, and the associated processing of personal data is Section 25 (2) No. 2 of the Telecommunications Digital Services Data Protection Act (TDDDG), as their use is necessary in order to make the requested InvestorPortal available. If the use of cookie functions includes the processing of personal data, this processing safeguards the legitimate interest of Aurubis AG in enabling shareholders and their proxies to use the InvestorPortal. The legal basis for processing this data is Article 6 (1) (f) of the EU General Data Protection Regulation (GDPR).

Users' consent will be obtained should cookie functions (including cookies) that are not strictly necessary for the operation of the InvestorPortal be used to make the InvestorPortal available. In this case, the users will be informed, prior to the use of such cookie functions, about our cookies or cookie functions with a cookie banner and related data processing when visiting the InvestorPortal and asked to provide their voluntary consent.

F. DATA RECIPIENTS

Service providers who are commissioned with organizing, executing and following up on the Annual General Meeting will only receive personal data from Aurubis AG that is necessary for the performance of the commissioned service and will process the data exclusively on behalf of and in accordance with the instructions of Aurubis AG. All employees and all employees of external service providers who have access to and/or process personal data are obliged to treat such data confidentially.

External service providers contribute to preparing and executing the Annual General Meeting, for example producing and sending the invitations; collecting and technically processing registrations to the Annual General Meeting, proxies and the exercise of shareholder rights; and the technical execution of the meeting itself.

In addition, Aurubis AG may need to transmit the personal data to other recipients, such as external consultants (e.g., lawyers).

In connection with the execution of the Annual General Meeting, the personal data of shareholders and, where applicable, their proxies may, under certain circumstances, be disclosed to other duly registered participants of the Annual General Meeting (e.g., by granting access to the legally required list of attendees, by publishing the motions submitted, or other requests subject to disclosure on the company website or in the context of other contributions made by shareholders or, where applicable, proxies prior to or during the Annual General Meeting via the communication channels described in the invitation to the Annual General Meeting).

The personal data is generally processed in countries that are members of the European Union ("EU") and the European Economic Area ("EEA"). Insofar as shareholders come from countries outside the EU or the EEA ("third countries"), Aurubis AG will also provide these shareholders with information (e.g., invitations to annual general meetings). Should these notifications also contain personal data (e.g., motions for annual general meetings stating the name of the applicant), then this data will also be transferred to third countries. The provisions of the GDPR do not directly apply in third countries. If the European Commission has not confirmed an adequate level of data protection, a lower level of protection for personal data may exist in these third countries. Nevertheless, a transfer is necessary in order to inform all shareholders equally, as Aurubis AG may not exclude shareholders from third countries from the duty to provide information. Aurubis AG therefore fulfills its contractual obligations with this transfer. The legal basis for the transfer of this data is Article 49 (1) (b) GDPR.

G. RETENTION OF DATA

Fundamentally, personal data will be deleted or anonymized as soon as it is no longer necessary for the above purposes and Aurubis AG is not obliged to retain it to meet legal accountability requirements and the legal obligation to retain data. The retention period for data collected in connection with annual general meetings is regularly up to three years. Furthermore, Aurubis AG only retains personal data if this is required due to legal provisions, for example based on the German Stock Corporation Act, the German Securities Trading Act, the German Commercial Code, and the German Tax Code, or due to a prevailing legitimate interest of Aurubis AG, particularly to assert, exercise or defend legal claims. Should Aurubis AG become aware that a shareholder is no longer a shareholder of Aurubis AG, it will only retain that shareholder's personal data for a maximum of twelve months in accordance with Section 67e (2) of the German Stock Corporation Act (AktG), subject to other legal regulations; longer retention will only take place if required for legal proceedings.

H. RIGHTS OF THE DATA SUBJECTS

If the legal requirements are met and with regard to the processing of their personal data, shareholders and proxies can request the following from Aurubis AG: information about their personal data pursuant to Article 15 GDPR, rectification of their personal data pursuant to Article 16 GDPR, erasure of their personal data pursuant to Article 17 GDPR, restriction of processing of their personal data pursuant to Article 18 GDPR, and the transmission of certain personal data to themselves or third parties that they designate (right to data portability) pursuant to Article 20 GDPR. Shareholders can exercise these rights free of charge by contacting Aurubis AG in one of the following ways:

Aurubis AG
Corporate Legal Department
Hovestrasse 50
20539 Hamburg, Germany
Phone: +49 40 7883-3993
Fax: +49 40 7883-3990
Email: dataprotection@aurubis.com

Right to object:

If the data is processed for the purpose of safeguarding legitimate interests, you can object to this processing at any time at the above address pursuant to Article 21 GDPR, if there are reasons resulting from your specific situation that preclude this data processing. Aurubis AG will then terminate data processing unless Aurubis AG can prove compelling, legitimate grounds for processing the data that outweigh the interests, rights and freedoms of the person affected or insofar as the data processing serves to enforce, exert or defend against legal claims.

Pursuant to Article 77 of the EU General Data Protection Regulation (GDPR), shareholders have the right to lodge a complaint with the supervisory authority of either the federal state/country in which they live or habitually reside, or the supervisory authority of the city of Hamburg, where Aurubis AG's headquarters is located.

You can reach our company's Data Protection Officer at:

Aurubis AG Data Protection Officer
c/o Aurubis AG
Corporate Legal Department
Hovestrasse 50
20539 Hamburg, Germany
Phone: +49 40 7883-3993
Fax: +49 40 7883-3990
Email: dataprotection@aurubis.com

Hamburg, December 2025

Aurubis AG
The Executive Board