

IL 13: DUE DILIGENCE REPORT

Introduction

This report gives information about “due diligence” politics and processes of Euromet supplying chain. This report is in line with the principles of the Quality System, European Rule (EU) 2017/821 and with the OECD “due diligence” guidance for responsible supplying chains of minerals and metals from *conflict-affected and High-Risk areas (CAHRAs areas)*

1. Information about the Company

Profile

Euromet SA is a Swiss trading house with a portfolio of non-ferrous metals, minor metals, ferro alloys and cored wires, providing long term supplies and satisfying customer demand.

Founded in 2007 in Paradiso, Switzerland, by seasoned professionals with relevant experience in the metals market, Euromet has established during the years a global presence around the world.

Euromet Group is a trading company that has worked for 2007 in the non-ferrous metals, ferro alloys and pig iron market. In this context Euromet plays the role of intermediary between production, trading and distribution to the metal industry. The international sourcing of raw materials enables us to have up to date market information and a global accurate view.

The diversification of our product range puts us in daily contact with the main sectors of the economy and their operators: automotive industry, constructions, cables, oil and gas and packaging. The constant relationships with the financial sector and the LME's brokerage houses allow us flexibility and efficiency over price execution on metals and the forex market. To this regard, we also provide dynamic hedging in order to reduce the risk exposure and stabilize price fluctuations.

Mission

Customers' satisfaction, through commercial, logistic and financial services, providing flexibility in sourcing, competitive prices, on time deliveries and customized solutions for unique needs.

Ownership structured

Euromet SA is 100% owned by Euromet International s.r.o., based in Praha, Czech Republic, which is REACH registered company, and Euromet SA owns 100% Eurotürkmet Metal A.Ş

2. Summary of the Responsible Minerals Assurance Process (RMAP)

Euromet SA identification number is. Euromet is a trading company working in the trading market of smelters and refiners approved by RMI.

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Euromet SA is a downstream company in the responsible supply chain of minerals and metals from *conflict-affected and High-Risk areas (CAHRAs areas)*.

Euromet SA has a procedure of “due diligence” in its supply chain (sourcing) as importer of metals in force in the Regulation particularly for tin and tungsten.

3. Supply chain politic

Euromet SA continuously struggles to implement sustainability strategy in all its transaction, in particular in respect of security, health, environment and human rights.

Supply chain politic is in line with the principles of the Quality System, with regulation (EU) 2017/821 and OECD Due diligence guidance for Responsible Supply Chains of Minerals from *Conflict-Affected and High-Risk Areas*. (ISO 9001, Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017, the ‘OECD Guidance’).

Euromet SA undertakes to face risks as specified in the enclosure II of the OECD guidance.

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Documents about the business system management have been given to suppliers, customers and employers and put at their disposition in the company web site <http://www.eurometsa.com>

4. Management structure

4.1 Management structure

Euromet SA has established an internal procedure regarding supply chain with “due diligence” measures.

In particular:

- Management and sale manager are responsible for “due diligence” and for the risk management and its implementation.
- Euromet SA gives an adequate training to its employers about managing system of responsible supply chain in particular for those minerals *from Conflict-Affected and High-Risk Areas*

4.2 Internal Systems of Control

The Manager in charge has the task to check the approved suppliers list and in particular to check that it is in accordance with the list of smelters approved by RMI (link <http://www.responsiblemineralsinitiative.org/reporting-templates/cmrt/>).

The check is made at least once a quarter and confirmed once a year giving a list of approved suppliers for the current year to the sale managers.

The “Conflict Mineral” report is also published in the company web site.

The report is updated every time it has been updated or a new smelter has been included.

The valid report is the one in the web site www.eurometsa.com (link <http://www.eurometsa.com/pages/certifications.html>).

4.3 Record Keeping Systems

Euromet SA keeps records relating to “due diligence program” in the company database for minimum five years.

5. Risk Identification

Euromet SA has developed and implemented a management process which includes policies, procedures, due diligence guidance, training, technical and survey monitoring documents which all staff has to conform with.

A guideline including behaviour and moral values against corruption, sanctions, anti-laundering and to prevent frauds, market abuses, tax evasion, competition laws, data security and clash of interest.

Euromet SA commits to support good business practices in accordance with the law.

Euromet SA identifies the risks regarding supply chain:

- Check metals included in the Annex I of Regulation (EU) 2017/821;
- Check supplier for these metals;
- Check smelters approved by RMI (<http://www.responsiblemineralsinitiative.org/reporting-templates/cmrt/>);
- Filled in declaration form;
- For customers possibility to download the declaration on website www.eurometsa.com (link <http://www.eurometsa.com/pages/certifications.html>).

Company purchasing strategy:

Strategy about purchasing for a responsible supplying chains for minerals and metals from *conflict-affected and high-risks areas (CAHRAs areas)*:

- Continue trading transactions adopting risk reduction measures; or
- Temporarily suspend trading transaction until resolution of risk reduction measures; or
- Terminate the contract with a supplier after attempts to reduce risk have failed.

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