

# Annual Due Diligence Report FY 2023

Concerning RJC CoC / LBMA RGG

## 1. Corporate and Supply Chain Policy

C.HAFNER'S Corporate Policy and Supply Chain Policy are available at [www.c-hafner.de](http://www.c-hafner.de) in the current version according to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, latest Edition.

## 2. Management Structure and Responsibilities

C.HAFNER's business management structure is available at [www.c-hafner.de](http://www.c-hafner.de). Internal responsibilities are managed by a certified management system according to DIN EN ISO 9001:2015.

## 3. Internal Control System

C.HAFNER's internal control system is guided by an ERP-System to provide mandatory information. This system is assessed annually and will be adjusted if needful. The core elements are:

- Identification of supplier and origin of material supported by an access on international data
- Precious metal accounts

Nearly 100% of scrap precious metal input comes from Europe and the EC. Chemical analysis technologies give us additional information about the origin of recyclable materials.

## 4. Record-Keeping System and Identification of Material Origin

C.HAFNER's record-keeping system is guided by an ERP-System to collect and provide all information of any transaction at any time entirely. All incoming transactions concerning the recycling process are documented by a photograph.

## 5. Identification of Red-Flags

C. HAFNER does not source from CAHRAs. Conflict-affected and high-risk areas are regularly assessed according to the list of CAHRAs under Regulation EU 2017/821. An internal risk assessment system provides information about the supply chain and about our business partners to react suddenly if any incidents will be detected. Red flags would be determined by information about money laundry, tax evasion, forced labour or any criminal activities. Digital technologies help us to obtain and assess information continuously. Currently, for 2024 no other than already known risks will be expected.

## 6. System Improvement

C. HAFNER is driven by an implemented continuous improvement process according to DIN EN ISO 9001:2015 that includes all entity processes and fulfils all requirements of any certification.

The preparation / material receipt team was relocated from the logistics department to the laboratories department. This further improves and strengthens the due diligence process by concentrating and continuously developing knowledge of all involved staff.

## 7. Summary Audit Reports

C.HAFNER's Summary Audits's are available on:

- [Responsible Jewellery Council - Chain of Custody](#)
- [London Bullion Market Association – Responsible Gold Guidance](#)

## 8. Responsibilities

Wimsheim, 2024-01-22

  
Mrs. Birgitta Hafner  
Managing Partner

  
Dr. Philipp Reisert  
Managing Partner