

# Annual Due Diligence Report FY 2017/2018

Concerning RJC CoC / LBMA RGG  
Extraction for publicity from Internal Management Review 2018

## 1. Supply Chain Policy

C.HAFNER'S Business 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 prevent a lack of 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

100% of the precious metal input comes from Europe and the EC.

## 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. In 2017 we archived approx. 14.000 transactions with photographs.

## 5. Identification of Red-Flags

C.HAFNER can not recycle ores or highly impure molten gold bars. The presence of mined material which could come from risk affected areas can be therefore excluded. C. HAFNER checks all incoming material for a typical fingerprint of mined material. So Red-Flags can be excluded categorically.

## 6. System Improvement

C.HAFNER is driven by an implemented continuous improvement processes according to DIN EN ISO 9001:2015 that includes all entity processes and fulfils all requirements of any certification. One main topic coming from this process was the installation of a fully digital controlled analytic process.

## 7. Summary Audit Reports

C.HAFNER's Summary Audits are available on:

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