

Due Diligence Summary Report – 2025

Concerning

RJC Code of Practices (2019) / Chain of Custody (2017)

LBMA Responsible Gold Guidance (v9)

LPPM Responsible PGM Guidance (v5)

1. Corporate and Supply Chain Policy

C.HAFNER'S Corporate Policy and Supply Chain Policy are available at www.c-hafner.de in their current versions.

C.HAFNER's [Corporate Policy](#) describes the company's management systems, based on compliance with DIN ISO (9001, 13485 with EU Reg. 2017/745, IEC 17025) and industry standards related assurance schemes (LBMA, RJC, LPPM). Furthermore, our corporate policy gives an overview of the organization's field of activities, our philosophy and values to which we adhere to. It also describes C.HAFNER's general business strategy and the overall goals we aim for as an enterprise.

The company's [Supply Chain Policy](#) is aligned to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, hereafter OECD DDG (3rd edition, 2016). Our supply chain policy reflects OECD DDG Annex II "Model Supply Chain Policy for a Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas (CAHRA)".

2. Management Structure and Responsibilities

An overview of C.HAFNER's corporate and management structure is available on our website under the COMPANY section. Internal responsibilities are managed by a certified quality management system according to DIN EN ISO 9001:2015.

3. Internal traceability and record-keeping system

C.HAFNER's internal control system is based on an ERP-System which is provided with comprehensive information with regards to each individual incoming material lot. The system is subject to annual assessment within the framework of industry assurance schemes (audits for responsible sourcing programs) and will be adjusted, if required. It consists of following key elements:

- Identification of supplier (KYC) supported by internationally recognized credit agency database, where our debt management department gathers information on ultimate beneficial owner(s) / UBOs, organization type and company registration details, financial details
- Identification of gold supplying counterparty (and its UBOs) in relation to any government lists (money-launderers, known fraudsters, terrorists)
- Identification of delivered material type, documented by photographs
- Identification and record-keeping of shipping/transportation documents
- Continuously (internally) monitored precious metal accounts (also for cooperation with governmental authorities)

C.HAFNER **excludes** processing or refining of mined or primary material (doré). The company sourced exclusively recycling material. Pre-consumer material (i.e. material diverted from the waste stream during a manufacturing process), post-consumer material (i.e. material generated by households or by commercial, industrial and institutional facilities in their role as end users of the product which can no longer be used for its intended purpose, „end-of-life / end-of-use“), and waste derived from pre- / post-consumer have been processed in C.HAFNER's recycling facility in Pforzheim. Once refined to market standard quality, the precious metals have been further manufactured into semi-finished products, components, powders and/or bullion/ingot (LBMA Good Delivery) at our manufacturing site / HQ in Wimsheim.

4. Identification of risks (location, type of material and supplier)

Based on the company's due diligence process and internal procedures, C.HAFNER does not source from CAHRA. However, for compliance reasons, CAHRA have been regularly assessed and documented on a quarterly basis, according to the indicative, non-exhaustive list of CAHRAs relevant to Regulation EU 2017/821, provided by RAND Europe. Internal traceability system described in point 3. further above serves as the basis for the internal risk assessment system. Red-flags identification included assessment of:

- Point in the supply chain where the material has been returned for refining/recycling
- Country of origin assessment against international sanctions
- Determination of general transportation routing
- Main markets, products and customer segments of the counterparty
- Types and forms of precious metals sourced by the counterparty
- Type and location of facilities operated by the counterparty (refining, manufacturing, jewellery production, pawn shops, etc.)
- Responsible sourcing policies and processes

5. System Improvement

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

6. Summary Audit Reports (Industry Assurance Schemes)

C.HAFNER's most recent independent assurance reports are available on the company's website:

- [2019 RJC COP](#)
- [2017 RJC COC](#)
- [LBMA Responsible Gold Guidance \(v9\)](#)
- [LPPM Responsible Platinum and Palladium Guidance \(v4\)](#)



Wimsheim, January 2026

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