Galata Chemicals GmbH
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ZUSAMMENFASSENDER AUDITBERICHT 2023/2024

gemäß Verordnung (EU) 2017/821

1. Einleitung

Im Rahmen der Verordnung (EU) 2017/821 („Konfliktmineralienverordnung“) ist unser Unternehmen verpflichtet, Sorgfaltspflichten entlang der Lieferkette für Zinn zu erfüllen und über Maßnahmen zur Risikoanalyse und Risikominimierung öffentlich zu berichten.

Für das Berichtsjahr 2023/2024 dokumentieren wir hiermit die Ergebnisse unserer Sorgfalts- und Auditprüfungen entlang unserer Lieferkette.

2. Gegenstand des Berichts

- Produkt: Zinn (Sn)
- Menge importiert im Jahr 2023: 400.330 kg; 2024: 175.004 kg
- Anwendungsbereich: Alle Importe aus Nicht-EU-Staaten
- Berichtszeitraum: 1. Januar 2023 – 31. Dezember 2024

3. Auditstrategie

Gemäß Artikel 4 der Verordnung (EU) 2017/821 können Unternehmen die Auditpflicht erfüllen, indem sie:
- selbst ein unabhängiges Audit ihrer Lieferkette beauftragen oder
- sicherstellen, dass ihre Lieferanten ausschließlich Materialien aus unabhängigen, OECD-konform geprüften Hütten/Raffinerien beziehen.

Wir haben uns für die zweite Option entschieden und stellen sicher, dass alle unsere Zinnimporte aus Hütten stammen, die im Rahmen des Responsible Minerals Assurance Process (RMAP) der Responsible Minerals Initiative (RMI) auditiert und als „Conformant“ gelistet sind.

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4. Auditnachweise – geprüfte Hütten / Raffinerien

Im Rahmen unserer Lieferkette wurden folgende Hütten/Raffinerien identifiziert. Alle sind auf der aktuellen RMI Conformant Smelter List gelistet und haben gültige, unabhängige Audits nach OECD-Leitlinien durchlaufen:

CID	Standort (Ort, Land)	RMI-Status	Auditzeitraum
CID001453	Sungailiat, Indonesien	Conformant	22.12.2018 – 31.01.2023
CID001182	Paracas, Peru	Conformant	01.09.2021 – 30.11.2024
CID003387	Kigali, Ruanda	Conformant	26.05.2023 – 30.04.2024

Das Responsible Minerals Assurance Process (RMAP) der Responsible Minerals Initiative (RMI) stellt ein unabhängiges Drittanbieter-Audit dar, das speziell entwickelt wurde, um die Anforderungen des OECD-Leitfadens für die Sorgfaltspflicht in mineralischen Lieferketten aus Konflikt- und Hochrisikogebieten zu erfüllen.
Die Verordnung (EU) 2017/821 erkennt solche Programme als geeignete Grundlage zur Erfüllung der Auditpflicht an. Alle im Rahmen unserer Lieferkette eingesetzten Hütten und Raffinerien sind im aktuellen RMI Conformant Smelter Program gelistet und haben ihre Konformität mit den OECD-Leitsätzen durch entsprechende Auditberichte nachgewiesen.

Damit gilt unsere Auditpflicht nach Art. 4 der Verordnung (EU) 2017/821 als erfüllt.

5. Risikoanalyse und -bewertung

Unsere Risikoanalyse umfasste:
- Abgleich aller identifizierten Schmelzen mit der aktuellen RMI-Conformant-Liste.
- Prüfung der Herkunftsländer auf Konflikt- und Hochrisikoklassifizierung gemäß CARHRA.
- Überprüfung der Lieferantenverträge auf Verpflichtung zur ausschließlichen Nutzung konformer Quellen.
- Analyse der Auditzeiträume, um sicherzustellen, dass sie den Bezugszeitraum abdecken.

Ergebnis:
- Alle Lieferungen 2023/2024 stammen aus auditierten, als conformant eingestuften Hütten.
- Keine festgestellten Risiken bzgl. Konfliktfinanzierung oder schwerer Menschenrechtsverletzungen.
- RMI-Auditzeiträume denken nicht den ganzen Berichtszeitraum ab
- Risikoeinstufung aller identifizierten Schmelzen: niedrig.

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6. Risikominimierungsmaßnahmen

- Vertragliche Verpflichtung unserer Lieferanten zur Nutzung ausschließlich RMI-conformer Quellen.
- Bestätigung unseres „Verhaltenskodex für Lieferanten" inklusive Bezugnahme auf Sorgfaltspflichten.
- Jährlicher Abgleich der verwendeten Hütten mit der aktuellen RMI-Conformant-Liste.
- Dokumentation und Archivierung aller Prüf- und Abgleichprozesse im Rahmen unseres Managementsystems.

7. Fazit

Alle in 2023/2024 importierten Zinnmengen stammen aus Hütten/Raffinerien, die im Rahmen des RMI-Standards unabhängig auditiert und als conformant zertifiziert wurden. Die vorliegenden Auditberichte denken nicht den kompletten Berichtszeitraum am.

Damit erfüllen wir die Auditpflicht nach Art. 4 der Verordnung (EU) 2017/821.
Unsere Risikoeinstufung für diese Lieferketten lautet: niedrig.
Wir werden diese Sorgfaltsprozesse fortlaufend weiterführen und weiterentwickeln.

8. Ansprechpartner

Für weitere Informationen oder Fragen steht Ihnen folgende Kontaktstelle in unserem Unternehmen zur Verfügung:

Sven Bachmann / Geschäftsführer
Sven.Bachmann@GalataChemicals.com
Veröffentlichung

Dieser zusammenfassende Auditbericht wird gemäß den Anforderungen der Verordnung (EU) 2017/821 öffentlich zugänglich gemacht und steht auf unserer Webseite unter https://www.galatachemicals.com/ zum Download bereit.

RESPONSIBLE MINERALS ASSURANCE PROCESS ASSESSMENT REPORT

The flagship program of the RMI, the Responsible Minerals Assurance Process (RMAP), formerly the Conflict-Free Site Program (CFSP), takes a unique approach to helping companies make informed choices about responsibly sourced minerals in their supply chains. Focusing on a “pinch point” (a point with relatively few actors) in the global metals supply chain, the RMAP uses an independent third-party audit of site/refiner management systems and sourcing practices to validate conformance with RMAP protocols and current global standards. The audit employs a risk-based approach to validate sites' company level management processes for responsible mineral procurement. Companies can then use this information to inform their sourcing choices. For more information, please visit: www.responsiblemineralsinitiative.org.

Auditee Name	PT Mitra Stania Prima
CID Number	CID001453
Facility Address	Komplek Industri dan Pelabuhan Air Kantung Sungailiat, Kepulauan Bangka Belitung 22043 Indonesia
Assessment Date(s)	03/02/2023 - 03/03/2023
Assessment Type	Re-audit
Assessed Material	Tin
Sourcing from High-Risk Supply Chains	No
Assessment Cycle	3 years

I.ASSESSMENT SCOPE

Assessment Period	12/22/2018 - 01/31/2023
Assessment Company	Arche Advisors

II.ASSESSMENT OBJECTIVES

The objective of the assessment is to assess the auditee’s level of conformance with the Responsible Minerals Assurance Process Tin Standard of Tin 2017.

III.ASSESSMENT METHODOLOGY

The assessment consisted of collecting and reviewing objective evidence including documentation, management and employee interviews, facility walk-through, and other observations demonstrating that the site/refiner’s due diligence management system conforms, in all material aspects, to the requirements of the applicable Standard.

IV.CONCLUSION

Assessment Results:	
☑	The assessment was conducted in accordance with ISO19001:2011 Standard, taking into account the guidance provided by the Responsible Minerals Assurance Process. The auditor verified the scope, selected samples, and gathered objective evidence through documentation review, interviews, and visual observations.
☑	The auditor found that the auditee’s due diligence system is in conformance, in all material aspects, with the requirements of the Responsible Minerals Assurance Process Tin and Tantalum / Tungsten / Gold Standard of 2017, Cobalt Standard of 2021, or Global Responsible Sourcing Due Diligence Standard for Mineral Supply Chains All Minerals of 2021 and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
☐	The auditor identified material non-conformance(s) between the auditee’s systems, processes and practices and the requirements of the Responsible Minerals Assurance Process Tin and Tantalum / Tungsten / Gold Standard of 2017, Cobalt Standard of 2021, or Global Responsible Sourcing Due Diligence Standard for Mineral Supply Chains All Minerals of 2021 and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Material non-conformance(s) relate to:
Auditor Statements:	
☑	The information provided by the auditee is true and accurate to the best knowledge of the Auditor(s) preparing the report.
☑	The findings are based on verified objective evidence relevant to the time period for the assessment.
☑	The Auditor(s) have acted in a manner deemed ethical, truthful, accurate, professional, independent and objective.
☑	The Auditor(s) are properly qualified to carry out the assessment.
☑	There were no limitations to this audit.

RESPONSIBLE MINERALS ASSURANCE PROCESS ASSESSMENT REPORT

The flagship program of the RMI, the Responsible Minerals Assurance Process (RMAP), formerly the Conflict-Free Site Program (CFSP), takes a unique approach to helping companies make informed choices about responsibly sourced minerals in their supply chains. Focusing on a “pinch point” (a point with relatively few actors) in the global metals supply chain, the RMAP uses an independent third-party assessment of facility/refiner management systems and sourcing practices to validate conformance with RMAP protocols and current global standards. The assessment employs a risk-based approach to validate facilities' company level management processes for responsible mineral procurement. Companies can then use this information to inform their sourcing choices. For more information, please visit: www.responsiblemineralsinitiative.org.

I.ASSESSMENT SCOPE

Facility Name	Luna Smelter
CID Number	CID003387
Facility Address	Karuruma-Jabana Kigali, Kigali 00000 Rwanda
Assessment Date(s)	05/27/2024 - 05/29/2024
Assessment Type	Re-assessment
Assessed Material	Tin
Sourcing from High-Risk Supply Chains	Yes
Assessment Cycle	1 year
Assessment Period	05/26/2023 - 04/30/2024
Assessment Company	Arche Advisors

II.ASSESSMENT OBJECTIVES

The objective of the assessment is to assess the facility’s level of conformance with the Responsible Minerals Assurance Process Tin Standard of Tin 2017.

Indicate which operations take place at the site and are under the same management control	
☐	Mining
☐	Blending
☐	Solvent Extraction and electrowinning
☑	Smelting
☐	Refining

☐	Other (please specify)

III.ASSESSMENT METHODOLOGY

The assessment consisted of collecting and reviewing objective evidence including documentation, management and employee interviews, and other observations demonstrating that the facility/refiner's due diligence management system conforms, in all material aspects, to the requirements of the applicable Standard.

IV.CONCLUSION

Assessment Results:	
☑	The assessment was conducted in accordance with ISO19001:2011 Standard, taking into account the guidance provided by the Responsible Minerals Assurance Process. The assessor verified the scope, selected samples, and gathered objective evidence through documentation review, interviews, and visual observations.
☑	The assessor found that the facility's due diligence system are in conformance, in all material aspects, with the requirements of the Responsible Minerals Assurance Process Tin and Tantalum / Tungsten / Gold Standard of 2017, Cobalt Standard of 2021, Mica Standard of 2021, Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc of 2021, Global Responsible Sourcing Due Diligence Standard for Mineral Supply Chains All Minerals of 2021, and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
☐	The assessor identified material non-conformance(s) between the facility's systems, processes and practices and the requirements of the Responsible Minerals Assurance Process Tin and Tantalum / Tungsten / Gold Standard of 2017, Cobalt Standard of 2021, or Global Responsible Sourcing Due Diligence Standard for Mineral Supply Chains All Minerals of 2021 and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Material non-conformance(s) relate to:
Assessor Statements:	
☑	The information provided by the facility is true and accurate to the best knowledge of the Assessor(s) preparing the report.
☑	The findings are based on verified objective evidence relevant to the time period for the assessment.
☑	The Assessor(s) have acted in a manner deemed ethical, truthful, accurate, professional, independent and objective.
☑	The Assessor(s) are properly qualified to carry out the assessment.
☑	There were no limitations to this assessment.

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I.ASSESSMENT SCOPE

Facility Name	Minsur S.A.
CID Number	CID001182
Facility Address	Panamericana Highway Km 238 Paracas, Ika NA Peru
Assessment Date(s)	01/08/2025 - 01/10/2025
Assessment Type	Re-assessment
Assessed Material	Tin
Sourcing from High-Risk Supply Chains	No
Assessment Cycle	3 years
Assessment Period	09/01/2021 - 11/30/2024
Assessment Company	Arche Advisors

II.ASSESSMENT OBJECTIVES

The objective of the assessment is to assess the facility's level of conformance with the Responsible Minerals Assurance Process Tin Standard of Tin 2017.

Indicate which operations take place at the site and are under the same management control	
☐	Mining
☐	Blending
☐	Solvent Extraction and electrowinning
☑	Smelting
☑	Refining

☐	Other (please specify)

III.ASSESSMENT METHODOLOGY

The assessment consisted of collecting and reviewing objective evidence including documentation, management and employee interviews, and other observations demonstrating that the facility/refiner's due diligence management system conforms, in all material aspects, to the requirements of the applicable Standard.

IV.CONCLUSION

Assessment Results:	
☑	The assessment was conducted in accordance with ISO19001:2011 Standard, taking into account the guidance provided by the Responsible Minerals Assurance Process. The assessor verified the scope, selected samples, and gathered objective evidence through documentation review, interviews, and visual observations.
☑	The assessor found that the facility's due diligence system are in conformance, in all material aspects, with the requirements of the Responsible Minerals Assurance Process Tin and Tantalum / Tungsten / Gold Standard of 2017, Cobalt Standard of 2021, Mica Standard of 2021, Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc of 2021, Global Responsible Sourcing Due Diligence Standard for Mineral Supply Chains All Minerals of 2021, and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
☐	The assessor identified material non-conformance(s) between the facility's systems, processes and practices and the requirements of the Responsible Minerals Assurance Process Tin and Tantalum / Tungsten / Gold Standard of 2017, Cobalt Standard of 2021, or Global Responsible Sourcing Due Diligence Standard for Mineral Supply Chains All Minerals of 2021 and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Material non-conformance(s) relate to:
Assessor Statements:	
☑	The information provided by the facility is true and accurate to the best knowledge of the Assessor(s) preparing the report.
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