

**Annual Step 5 Due-Diligence Report 2022**

<b>Table 1: Refiner's details</b>	
Refiner's Name	WIELAND Edelmetalle GmbH
CID Number	CID002778
Facility Address	Schwenninger Str. 13, 75179 Pforzheim, Germany
Scope	RMAP: Au      RJC: Au, Ag, Pt, Pd
Senior management responsible for this report	Stefan Helmling, Managing Director

<b>Table 2: Summary of activities undertaken to demonstrate compliance with RJC CHAIN-OF-CUSTODY-GUIDANCE</b>		
<b>Step 1:</b>	Establish strong company management systems.	WIELAND has strong company management systems in place and has fully complied with step 1
Supply chain policy	WIELAND has adopted a supply chain policy. Our supply chain policy is published on our Homepage: <a href="http://www.wieland-edelmetalle.de/company/">http://www.wieland-edelmetalle.de/company/</a>	We established an appropriate supply chain policy for Gold, Silver, Platinum, Palladium and Rhodium, which is consistent with the model set out in the Annex II of the OECD Due Diligence Guidance. This established our responsibility for conducting risk-based due diligence, screening and monitoring of transactions and governance structures on site. This policy is our commitment to implement the relevant regulatory and ethical requirements.
Management structure and responsibilities for due diligence program	WIELAND has set up an internal management structure to support supply chain due diligence.	Internal management has been established to define governance, roles and response, internal audit, communication, and management review in accordance with the adopted policy. A Compliance Officer has been appointed for the SAXONIA Group to manage the process and report directly to the Managing Partner.
Internal control systems and processes for information collection	WIELAND has established a strong internal system of due diligence, controls and information collection over Precious Metal supply chain.	WIELAND has robust internal control systems in place. The accompanying documents of the shipments must be checked. Each lot received is accurately registered in our digital transaction system. Before the material is processed, specific checks are carried out regarding the identity and origin of the material received.
Record-keeping system and processes for identifying material origin.	WIELAND has established checks and controls for incoming materials and will keep appropriate records.	WIELAND has robust procedures in place to identify the origin of materials. All documents of the shipments must be verified. Each lot received is accurately recorded in our digital transaction system. Specific checks are carried out on the material received before it is processed.

<b>Step 2:</b>	Identify and assess risks in the supply chain	
System for identifying red flag locations	Wieland has a process to identify red flag locations in the supply chain.	<p>We identify and assess risks in our supply chain. Red flag locations are identified in a country risk matrix which is based on the following international recognized risk indicators Heidelberg Conflict Barometer, World Justice Project (WJP), Sustainable Governance Indicators (SGI) for OECD- and EU-countries, World Governance Indicator (WGI) of Worldbank, High risk third countries according to EU directive 2015/849, FATF-list of German Federal Ministry of Finance, EU CAHRA-list as defined under EU regulation 2017/821 as well as TDi CAHRA Index.</p> <p>Based on the total risk summary the country locations are clustered in low, medium and high risk countries.</p> <p>The latest country risk assessment from 20. June 2023 lists 21 low risk, 47 medium risk and 76 high risk countries.</p> <p>We set up a customer database for suppliers and assign them a risk profile according to our risk profile criteria. This KYC process is a formal prerequisite for entering a business relationship with a supply party. Our due diligence process is carried out using a risk-based approach. We only accept recycling supplies, no mined material.</p>
Description of red flags in supply chain.	We have implemented a process to identify "red flags" in the supply chain, based on "red flags" in the area of our business partners and in the quality of delivered material.	<p>During the counterparty adoption process, we perform various checks to identify red flags on the customer's side. Daily we check the material arriving at our plant in terms of material composition and country of origin, as well as countries in transit.</p> <p>At present none of the supplies is coming from high risk locations or red flagged operations. 98,2% of all supplies is coming from low risk locations, the remaining from medium risk countries.</p>
Steps taken to map red flag supply chain	We check red flags in the supply chain during our KYC-process and during material checks when the material arrives at our plant.	<p>The approach of our KYC process is to prevent supplies from high risk locations (red flags). The KYC checks are accompanied by regular reviews and event-driven reviews. In addition, we check each material delivery against predefined parameters. In the audit period no supplies were coming from high risk locations.</p>

Methods, practices and information yielded by on-the-ground assessment teams	We visit significant business partners on a regular base. We use these visits also for gathering information.	Staff visiting partners have received training to verify relevant standards. We document our visits through a special report that is used to verify site conditions. The report includes information about the site, supply chain and due diligence. During the reporting year, site visits to partners were limited due to the Corona pandemic. As no supplies from high risk location were received, no high risk locations had to be assessed.
Actual and potential risks identified (not for potential suppliers)	WIELAND has set up risk assessment and management for the complete supply chain.	The check for actual and potential risks is implemented in the KYC and due diligence processes. In addition, we check each material delivery against internal standards regarding origin, supplier and plausibility. Only suppliers from low and medium risk locations are approved for deliveries to WIELAND.

<b>Step 3:</b>	Design and implement a strategy to respond to identified risks (if applicable).	We have fully complied with Step 3: Design and implement a strategy to respond to identified risks (if applicable).
How internal control systems have been strengthened to collect reliable information from red flag supply chains.	In order to harmonise internal control systems with the Compliance requirements, WIELAND has strengthened information collection in the supply chain.	We strengthened and deepened controls and intelligence gathering throughout the supply chain through revised KYC-processes and due diligence processes.
Steps taken to manage risks, including involvement of affected stakeholders. Efforts made to monitor and track performance for risk mitigation.	WIELAND has established risk management and appointed designated managers to track performance.	The risk management systems in place are designed to be reviewed annually by the appointed manager, i.e. compliance. Reporting is reviewed by management for improvements to the process. The annual report also monitors the involvement of the stakeholders concerned.
Number of instances where member has decided to disengage from suppliers.	We have a process in place to report the number of instances where we have decided to part ways with suppliers.	We run our KYC process as a Group-wide process that includes reporting to the Group's management and Executive Committee. To provide the necessary resources, a Compliance Manager has been hired at the Group holding company. Since 2019, all new potential customers have been screened in accordance with the applicable KYC process and only after approval by the Compliance Department has a business relationship been established. Customer relationships already existing at this time are also checked accordingly and approved once again. In the event of a failure to comply with KYC requirements, the customer relationship is terminated. All KYC checks for existing

		customers will be completed by December 31, 2023. To date, a total of 731 customers have passed the KYC check. In 2022, 25 potential customers did not meet the requirements of our KYC process. 24 customers submitted no or incomplete documentation and were therefore temporarily suspended. We terminated the relationship with one customer due to indirect association with sanction listed individual. 24 KYC checks are currently still in process.
All instances of risk mitigation and results of follow-up after six months.	WIELAND has established the required tools to perform risk mitigation.	Identified risks are investigated by the Compliance Department. The results of the assessment are reported to Senior Management. Senior Management supported by the Compliance Officer decides on a case-by-case basis which strategy for risk management will be implemented.

<b>Step 4:</b>	Carry out independent third-party audit of refiner's due diligence practices.	The independent auditing companies KPMG and TDI regularly audit WIELAND in accordance with the relevant compliance regulations i. e. of the Responsible Jewellery Council COP and COC Standards and the RMAP Standard of the Responsible Minerals Initiative (RMI).
Last Assessment Date	07/19/2022 – 07/21/2022	
Assessment Period	04/01/2018 – 05/31/2022	
Assessment Type	Re-audit	
Assessment Cycle	1 year	
Lead auditor name	David Sturmes, TDi Sustainability	
Most recent audit summary report	<a href="https://www.responsiblemineralsinitiative.org/media/docs/Public Reports/Wieland Edelmetalle Public Report.pdf">https://www.responsiblemineralsinitiative.org/media/docs/Public Reports/Wieland Edelmetalle Public Report.pdf</a>	

Pforzheim, 17.10.2023

**Stefan Helmling**  
Managing Director

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