

### Third-party audit by DEKRA

Steel  
Packaging Steel

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In 2023, thyssenkrupp Rasselstein GmbH was audited for the first time by the DEKSOR authority for the full implementation of EU Regulation 2017/821 regarding the supply chain of conflict minerals. In this business model—the production of tinfoil—the supply chain involves tin.

As a result of these control measures, thyssenkrupp Rasselstein was asked to undergo a third-party audit in order to identify and implement further improvement potential in the processes.

On October 30 and 31, 2023, an audit was carried out by DEKRA at the Andernach plant of thyssenkrupp Rasselstein based on the aforementioned regulation. DEKRA specified the audit order as follows:

“The performed audit had the aim to ensure that thyssenkrupp Rasselstein GmbH meets the requirements of EU Regulation 2017/821 on due diligence in the supply chain for conflict minerals and follows the Organization for Economic Co-operation and Development (OECD) guidelines for responsible supply chains with regards to conflict minerals. This includes verifying and assessing the origin and trade of minerals to ensure that they do not originate from conflict regions and do not contribute to the financing of armed conflicts. As part of the audit, the management system, processes, documents and external supplier audits were randomly checked on site.

In the subsequent document review, documents, written evidence and other documents relevant to the assessment, which were provided by thyssenkrupp Rasselstein GmbH, were assessed. On the basis of these documents, the on-site results were compared and evaluated in detail once again. Based on the results, the auditors came to the conclusion that minor and major deviations from the requirements of EU Regulation 2017/821 are to be stated. In addition to the deviations, recommendations and potentials were identified.”

The following elements of the regulation were examined by DEKRA:

- Management system
- Risk management plan
- Supply chain policy
- Traceability
- Disclosure obligations
- Training
- Internal and external monitoring system

In the overall assessment, thyssenkrupp Rasselstein GmbH received the following rating from DEKRA:

“The audited employees at thyssenkrupp Rasselstein GmbH were extremely cooperative and committed. The employees showed a clear willingness to comply with EU Regulation 2017/821. They were committed and willing to take the necessary steps to comply with the legal requirements and implement appropriate measures in line with the EU regulation. In principle, the audited employees were well-informed about the requirements of EU Regulation 2017/821 and the associated additional requirements. This made communication and the exchange of information easier.

These positive aspects underline thyssenkrupp Rasselstein GmbH’s commitment to compliance with the EU regulation and the implementation of appropriate measures in dealing with conflict minerals.”

DEKRA identified improvement potential in all the listed elements of the regulation to further perfect the existing processes and also prepare for future extensions of the legal stipulations.

For this reason, thyssenkrupp Rasselstein GmbH will present the implementation of these improvements to DEKRA in further audits in April 2024 and October 2024. The aim is to be able to present to customers and the public a future-oriented system for avoiding risks in the supply chain of conflict minerals, in this case tin, by the end of 2024.

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