

Annual report 2024

in accordance with Regulation (EU) 2017/821 Article 7

Activities to implement the due diligence obligations for the import
of tin and tungsten in accordance with Regulation
(EU) 2017/821 of thyssenkrupp Materials Trading GmbH



About thyssenkrupp Materials Trading GmbH

As part of the thyssenkrupp Group, thyssenkrupp Materials Trading GmbH is an integral part of thyssenkrupp Materials Services. With an extensive sales and distribution network, the company ensures the reliable supply of a wide range of materials to industries worldwide.

Our activities span several continents and reflect our commitment to providing high quality materials and first class services to our partners. By leveraging our global presence, we offer flexible solutions that meet the changing needs of our customers and position ourselves as a reliable partner for long-term success in the international arena.



01

Obligations arising from the EU Conflict Minerals Regulation



Since January 1, 2021, new obligations have applied in the European Union under Regulation (EU) 2017/821, which regulates trade in four minerals - tin, tantalum, tungsten and gold. With this regulation, the EU wants to prevent the trade in these minerals from supporting armed conflicts and forced labor. Since then, companies importing these raw materials into the EU have been subject to extensive due diligence and verification obligations along the supply chain.

thyssenkrupp Materials Trading, a subsidiary of thyssenkrupp Materials Services, is an international trading and service company headquartered in Essen. The product range includes raw materials such as alloys, non-ferrous metals, minerals, coke, coal and ores, various raw materials for future technologies, metallurgical products such as steel and pipes, pipe accessories, rolled steel and stainless steel as well as material and logistics services of all kinds. The range is rounded off by needs-based offers including financing and freight forwarding.

As an importer of tin and tungsten, thyssenkrupp Materials Trading welcomes the entry into force of the regulation, as the company has already integrated the principles enshrined in it into its procurement policy since 2010. To this end, the management systems and internal control systems of the company structure have been adapted accordingly in recent years.

02

Risk assessment in the supply chain

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The modern use of tin is in the field of electric soldering as well as in the tinning of food-safe preserves or in medicine. Tin is used as an alloy component in a variety of ways, mainly with copper to form bronze or as a component of metal alloys with a low melting point. Most of the tungsten produced worldwide is processed into tungsten carbide, which is used in the manufacture of hard metal tools. In addition, tungsten is primarily used as an alloying element in high-temperature applications. Due to its high corrosion resistance, tungsten can also be used as a material for equipment in chemical plants.



Tin and tungsten are therefore essential minerals that must be used in modern industry. However, to ensure that this requirement does not come at the expense of people and the environment, thyssenkrupp Materials Trading ensures the sustainability of its supply chains - and not just since today. The company has not sourced tin or tungsten from conflict regions for more than a decade. Human rights, fair working conditions, environmental protection and the fight against corruption - these values are not only important within the thyssenkrupp Group, but also apply to the entire supply chain. thyssenkrupp is therefore committed to the United Nations Global Compact through its Supplier Code of Conduct.

At thyssenkrupp Materials Trading, procedures have been in place for years to review tin and tungsten supply chains and identify risks. The company's supply chains are transparent and are subject to regular audits. The issue of conflict minerals and the requirements of Regulation (EU) 2017/821 have been integrated into the existing ISO 9001 system. Compliance with the obligations is ensured through the planning and implementation of internal and external audits. All relevant documents, reports and procedural instructions are managed, maintained and stored in accordance with internal rules. The extraction of certain raw materials in countries such as the Democratic Republic of Congo and neighboring states sometimes contributes to significant human rights violations and the financing of violent conflicts in this region. thyssenkrupp Materials Trading therefore does not source any raw materials that directly or indirectly finance or benefit armed groups and is in close contact with its suppliers at all times to increase transparency with regard to the products supplied. The aim is to further expand cooperation with customers, suppliers and other stakeholders in order to ensure even better approaches and more practicable solutions. Risk identification and assessment for all aspects of the supply chain is carried out on both a country-specific and customer-specific basis. The risk process is supported by the use of Chara analyses, ITSCI analyses, Sustainable Development Report 2024, RMI analyses and other sources as required. thyssenkrupp Materials Trading GmbH works with selected suppliers, most of whom have long-standing business relationships with us.

Tin and ferrotungsten (both metals and alloys) are not currently sourced directly from any Chara regions. The tin declared for free circulation in the EU by thyssenkrupp Materials Trading in 2024 was imported from Bolivia and Malaysia. From the very beginning, thyssenkrupp Materials Trading has pursued a holistic approach in its cooperation with suppliers: The mining and processing of tin and tungsten are not only in line with human rights, but also with high labor and environmental standards.

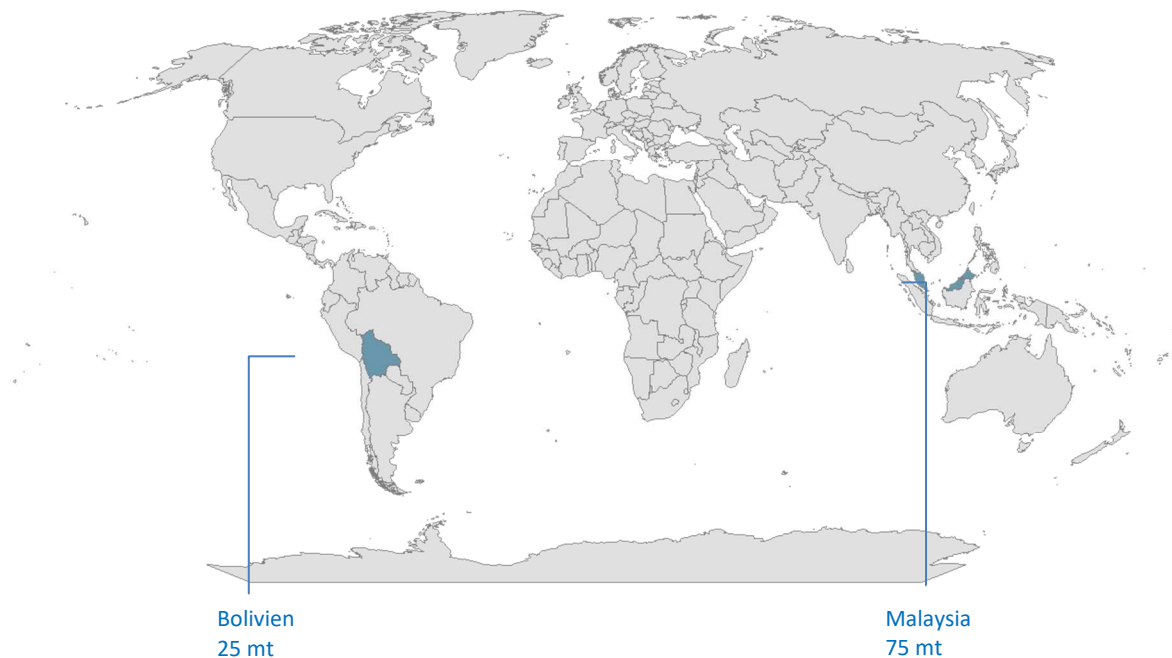
03 Supply flow

In the fourth reporting year of the new Conflict Minerals Regulation, thyssenkrupp Materials Trading declared a total of 100 tons of tin for release into the EU customs-free zone. This comes from South America (Bolivia) and Asia (Malaysia).

The free sources of supply are based on the list of verified suppliers of the Responsible Business Alliance (RBA), formerly the Electronic Industry Citizenship Coalition (EICC), as amended.

A risk management strategy has been developed to present the supply flows with the respective suppliers, which is checked by means of neutral internal and external audits. The aim is to keep management permanently informed and up to date on developments in the handling of conflict raw materials

thyssenkrupp Materials Trading prepares an annual revision of the CMRT form for communication with customers. The CMRT form was developed by the Responsible Minerals Initiative (RMI) to facilitate the collection of data on conflict minerals 3TG (tin, tantalum, tungsten and gold) and to create transparency for interested groups and customers.



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Procurement Process

If you have any questions about the procurement process for tin and tungsten, please contact the following employees:

Stephan Mis
Qualitymanagement
thyssenkrupp Materials Trading GmbH
T: +49 201 844-563837
stephan.mis@thyssenkrupp-materials.com

Annette Schott
Qualitymanagement
thyssenkrupp Materials Trading GmbH
T: +49 201 844 53
annette.schott@thyssenkrupp-materials.com

Oliver Grewatsch
Head of Governance
thyssenkrupp Materials Services GmbH
GmbH T: +49 201 844-535459
oliver.grewatsch@thyssenkrupp-materials.com

Marina Breiltgens
Manager Governance & Sustainability
thyssenkrupp Materials Services
T: +49 201 844-576218
marina.breiltgens@thyssenkrupp-materials.com

05

Complaints

As part of other compliance programs, thyssenkrupp has introduced a complaints/whistleblowing system at Group level:

Complaints can be addressed to
thyssenkrupp AG
CO / L&C-NV
thyssenkrupp Allee 1
45143 Essen

T: +49 201 844-505050
whistleblowing@thyssenkrupp.com

The complaints received here are only visible to the Compliance Officer.
In his or her function, the Compliance Officer decides on further steps or procedures in connection with the complaint received



