



# LME Secondary Materials Sourcing Attestation Form

Reporting template for LME-listed brands, version 3

Revision date: December 2022

## LME SECONDARY MATERIALS SOURCING ATTESTATION FORM

### Introduction

- The LME Secondary Materials Sourcing Attestation Form (the “attestation form”) is intended for Producers of Brands that source solely from Secondary Material sources for their feedstock to their LME Brand according to Section 8 of the LME Policy on Responsible Sourcing of LME-Listed Brands (the “Policy”).
- Producers sourcing Primary Materials should consult the Policy for information on Track A, B, or C and other information relating to compliance. If unable to determine the origin of minerals sourced, Brands will automatically be referred to Track A.
- ISO 14001 and OHSAS 18001 / ISO 45001 (or equivalent certification programmes) are required for all Brands and the first LME reporting date for these additional requirements is 31 December 2023.
- Capitalised terms not otherwise defined in this form shall have the meanings ascribed to them under the Policy.

### Section 1. BRAND INFORMATION

LME Brand Producer name <sup>1</sup>	
LME Brand name(s) <sup>2</sup>	
Reporting Period start date (DD/MM/YYYY)	
Reporting Period end date (DD/MM/YYYY)	
Date of submission (DD/MM/YYYY)	
Address of Brand Producing site	
Website of Brand Producer	
Name of person submitting form	
Job title of person submitting form	
Phone number	
Email address	

**Context:**

The attestation form did not previously require a Reporting Period to be stated. This has been modified so that Brands, the LME, and potential users of the data about these Brands can be confident in the dates from when the Brand assures that they only sourced 100% recycled material.

**Question:**

12) Do you believe this change is appropriate?

<sup>1</sup> This may be found on the list of LME Approved Brands: <https://www.lme.com/en/physical-services/brands/approved-brands>.

<sup>2</sup> Most often each Brand will require a unique form. However, if multiple Brands are produced by the same Producer and the responses to the questions are identical for all said Brands, one form may be submitted for all Brands.



**Section 2. Supporting information**

Please answer the following questions about the sourcing practices of the Producer. In addition to the information provided, please include with your submission any other documentation deemed relevant.

1. Describe the Producer’s methods to ensure Input Materials sourced during the Reporting Period are 100% Secondary Materials. Examples of assurance methods include, but are not limited to, conducting site inspections or independent audits of suppliers.

2. Describe the corporate level checks the Producer conducts on its suppliers. This is also known as Know Your Client/Counterparty (“KYC”) and is typically undertaken before entering into a business relationship with a supplier.



**Section 3. Declaration**

I confirm on behalf of \_\_\_\_\_ [*insert the name of the Producer of the registered Brand*] that the information in this attestation form is true, accurate, and complete, and, furthermore, that \_\_\_\_\_ [*insert Brand name*] Brand sourced 100% Secondary Materials for its feedstock in this Reporting Period.

**Authorised Signatory\* signature:** \_\_\_\_\_

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_

**\*Authorised Signatory** – an individual with the capacity and authority to sign this form on behalf the organisation

**Context:**

With the addition of the Secondary Materials Track formally into the Policy, many of the definitions and expectations have been removed from the attestation form and are now in the Policy itself. Based on the responses from the first year, the LME was also able to condense the three questions from the original attestation form into two questions, and has reduced the number of signatures required from one to two to simplify the process for Producers. In addition, the following paragraph was deleted:

*Upon the provision of at least thirty (30) days' written notice (but without notice in the case of a breach or suspected breach of the instructions of this attestation form), the Brand shall permit the LME and/or its advisors and/or any independent professional auditors acting on behalf of the LME to gain access (both physical and remote) and inspect during normal business hours the systems, controls, books, records and/or other documents as may be required. Additionally, to inspect the Brand's sourcing data and, where appropriate, that of its affiliates, and any other information held by the Brand or its affiliates for the purposes of auditing the Brand's compliance with this attestation form. The LME shall ensure that its advisors and/or its auditors treat all information obtained from a Brand during the course of any audit as confidential information.*

However, it should be noted that the LME still retains this power as part of Paragraph 14 Co-Operation with LME Investigations of the Policy itself.

**Question:**

13) Do you believe these changes hold Producers to the appropriate level of accountability when it comes to identifying their material as 100% secondary?

