LME
An HKEX Company

LME Red Flag Assessment Template

Reporting template for LME-listed Brands, version 2

Revision date: January 2023

LME RED FLAG ASSESSMENT TEMPLATE

Introduction

- This document constitutes the LME RFA Template (the “template”) for the purposes of the LME Policy on Responsible Sourcing of LME-Listed Brands (the “Policy”). This template and embedded workbook is only required for Brands following the Audited LME RFA Track (Track B) and the Published LME RFA Track (Track C). Capitalised terms not defined herein have the meaning ascribed to them in the Policy.
- This template is based on the “Supplement on Tin, Tantalum and Tungsten” of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition. References to “OECD Guidance” in the context of this template should be interpreted accordingly.
- The purpose of the OECD Guidance is to help companies respect human rights and avoid contributing to conflict through their sourcing decisions, including the choice of their suppliers[1].
- Producers should consult the Policy for information on Reporting Periods, and submission deadlines; other contextual information may be found in the guidance notes published by the LME.
- Please submit all relevant documents in English, this includes the template, RFA workbook, and any supplemental documents the LME should consider as part of the submission.
- The RFA workbook is available here:

Microsoft Excel Worksheet

[1] OECD Guidance, page 12

Section 1. BRAND INFORMATION	
LME Brand Producer name[2]	"[REDACTED]"
LME Brand name(s)[2,3]	"[REDACTED]"
Reporting Period start date (DD/MM/YYYY)	01-Czerw-2023
Reporting Period end date (DD/MM/YYYY)	31-Maj-2024
Date of submission (DD/MM/YYYY)	07-Czerw-2024
Address of Brand producing site	"[REDACTED]"
Website of Brand Producer	"[REDACTED]"
Name of person submitting RFA	"[REDACTED]"
Job title of person submitting RFA	"[REDACTED]"
Phone number	"[REDACTED]"
Email address	"[REDACTED]"

[2] This may be found on the list of LME Approved Brands: https://www.lme.com/en/physical-services/brands/approved-brands

[3] In the majority of cases, each Brand will require a unique RFA. However, if multiple Brands are produced by the same Producer, and the responses to the RFA questions are identical for all said Brands, one RFA may be submitted for all Brands.

Section 2. COMPANY MANAGEMENT SYSTEMS

a. Describe the Producer's supply chain due diligence policy. The policy should incorporate the standards against which due diligence is to be conducted, consistent with the model policy contained in Annex II of the OECD Guidance.[4]

Please provide a link or a copy where available.

"[REDACTED]" has been pursuing a supply chain due dilligence policy for many years.
Our activity in supply chain is based on several documents placed at our website:
"[REDACTED]"

These documents regulate good business practicies, transparency and responsible sourcing.
Everyone is responsible for compliance with above mentioned regulations in their own scope and this is supervised by Board of Directors through Departament Managers.

Following above mentioned documents we select clients who meet our requirements, conduct transparent commercial activities, have impeccable reputation and are not involved in any conflicts.

[4] OECD Guidance, page 20

b. Describe how this policy been communicated to suppliers, employees, and the public.[5]

Documents are placed at our website and everyone has unlimited access to read and download.
We require from our suppliers to sign a declaration at our KYC form that they undertake to comply with current OECD Due Dilligence Guedlines for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas.
Apart from this we ask them to get acquintant and comply with our Supply Chain Policy which is placed at our website.

c. Explain the management structure responsible for the Producer's due diligence, including who is directly responsible for implementing the supply chain due diligence policy.[6]

The purchasing of feed materials at "[REDACTED]" is done by staff of Sales and Raw Materials Purchasing Department .
The employees of a.m. department, Department Manager are responsible for implementing the supply chain policy and this is supervised by Marketing Director-Member of the Board and Board of Directors.

[5] OECD Guidance, page 17
[6] OECD Guidance, page 17 and page 52

d. Describe the system of controls and transparency over the mineral supply chain put in place by the Producer. This includes:
   a. the type of information[7] the Producer collects from suppliers,
   b. whether this information is required in commercial contracts with suppliers[8]
   c. the format of the record-keeping of the Producer (such as paper-based, computerised, digital leger technology, or part of an institutionalised mechanism)[8], and
   d. for how long this information is stored[8].

Purchases are made exclusively from trusted and proven suppliers. The portfolio of suppliers is mostly the same every year. With regard to the possible new suppliers, the process is always individual. First the quality of offered material is checked, and if ok, then the supplier is checked through all possible sources, including reports from business intelligence, information from website, financial statements, extracts from commercial registers.
In case of any doubts, the supplier is not accepted.
In the contracts concluded with our suppliers the obligations of the parties concerning complying to the local law rules, tax paying etc. are explicitly stipulated.

Each contract must be approved by lawyers confirming compatibility with binding law and is signed by authorized persons including member of the board. The data concerning contracts and customers are never disclosed to third parties, unless required by law (national authorities, police, etc.).

Mainly we purchase zinc concentrates from direct producers and on the smaller scale we buy zinc from worldwide known global trading companies trusted by customers.

In our files, we keep the following documents, evidencing who the miner is, where the miner is located etc, enabling us to verify each delivery:
- Invoices
- MSDS (material safety data sheet)
- Certificates of origin
- Bills of Lading, CMRs

The documentation is stored for 5 years.

[7] OECD Guidance, page 38, which refers to the information expected on page 37
[8] OECD Guidance, page 38

e. Describe the data the management system has yielded this Reporting Period and how it has strengthened the company's due diligence efforts.[9]

"[REDACTED]" has evidence of delivered material and we are able to check if deliveries are compliant with contract requirements regarding place of origin, quality, quantity and other conditions.
The data management system helps us to collect data and transfer it to the relevant institutions and control authorities.

We require from our suppliers to sign a declaration at our KYC form that they undertake to comply with current OECD Due Dilligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas.
Apart from this we ask them to get acquintant and comply with our Supply Chain Policy which is placed at our website.
We also check customers and collect information, internet, professional magazines, seminars, presentations and business meetings.
We also order and collect reports about our customers in indpendent commercial intelligence agences like "[REDACTED]" and get information like: history of the company, domicile, officies, ownership, court registrations, financial standing, tax paying, insolvency procedures

f. Confirm that a company-level or industry-wide grievance mechanism has been established and provide evidence.[10]

Supply Chain Policy; Anticorruption and whistleblower policy "[REDACTED]"; Code of Ethics, ISO 9001 regulates grieviance mechanizm.
We have 2 channels to contact us about grievance:
- electronic form - "[REDACTED]"
- paper form send to Board Member - Marketing Director personally
All details are placed on our website.

[9] OECD Guidance, page 52
[10] OECD Guidance, page 17 with details on page 40

g. Describe the Producer's method for identifying Conflict-Affected and High-Risk Areas ("CAHRA").[11]

We trace current OECD publications of CAHRA areas we also obtain information from other sources like internet, press, talks with our business and non business partners and organizations like ILZSG and IZA about situation in areas we source zinc concentrates.
Based on our ducumentation and methods described in previous points we can verify whether the material sourced belongs or not to CAHRA.
In isolated cases when Trading Company due to commercial issues doesn't wand to give us the full details of the mine producing concentrate we ask them to certify that they obey our rules of supply chain policy in accordance with OECD gudelines.

Yeach time we sign a contract with a new customer we ask him to fullfill Known Your Customer form.
We also use "[REDACTED]" reports prepared by "[REDACTED]" with information about the client and country risk assessment which help us to make a decision about the cooperation. If rating is A the macroeconomic data are positive, political situation is stable etc. If rating is C the situation is just opposite and we make further investigations.
If we still have any doubts we ask customers for written declaration about origin of material.

"[REDACTED]"

Apart from that we trace any news in media concerning the country we source raw materials.

https://www.cahraslist.net/cahras

[11] Though not directly referenced in the OECD Guidance, the LME requires this information to be disclosed as part of the transparency requirements for Track C. In line with the Policy, the LME expects that the definition of "conflict-affected and high-risk areas" will be as set out in the "Supplement on Gold" of the OECD Guidance page 66.

Section 3. LOCATION OF MINERAL ORIGIN AND TRANSIT RED FLAG EVALUATION

Use the workbook to provide the following information:

a. On the basis of the Producer's Company Management Systems for tracing the transit of materials from its operations and those of its suppliers, list all countries from which the minerals used for this Brand originated and transited through during the Reporting Period.
b. Identify whether each of the countries listed in (a.) is a source for the Brand material or a country through which the material only transits.
c. Specify the type of material being sourced or transited. This is optional to disclose and only requested to assist in answering the remaining questions.
d. Classify each country's CAHRA status:
    (i) A country of which no area falls into the CAHRA definition;
    (ii) A country of which all areas fall into the CAHRA definition; or
    (iii) A country of which some, but not all areas fall into the CAHRA definition. In this case, indicate whether the material is sourced from or transits through the CAHRA in the comment column.
e. For each of the source countries identified, assess if the volume of mineral the Producer sourced during the Reporting Period is in keeping with the source country's known reserves and expected production levels. Provide the result of your assessment.
f. For each of the countries identified, assess if this country known to transit materials from CAHRAs.
g. For each of the source countries in (b.), assess the status of the supplier's Extractive Industry Transparency Initiative ("EITI") implementation following these steps[12]:
    (i) State whether or not the country is an EITI-implementing country[13];
    (ii) If the supplier is located in an EITI-implementing country, identify if the supplier is in compliance with the EITI reporting requirements of that country[14]. Provide links to the relevant company's submission for the purpose of EITI reporting, where such a disclosure does not reveal commercially sensitive information.
    (iii) If the country is not an EITI-implementing country, identify if the supplier takes other steps to provide transparency on payments to governments and other matters in line with the aims of EITI. Provide link(s) to disclosures where available.

[12] The LME believes that financial crime and corruption risk represent important concerns for industry stakeholders. Accordingly, the LME is particularly keen to ensure that the principles of the EITI, as referenced on page 52 of the OECD Guidance, are embedded into global supply chains. As such, this template references the specific wording of the OECD Guidance in respect of EITI, but further requires that Producers explain broader disclosure on a per-country basis.
[13] The status of country's EITI implementation can be found here: https://eiti.org/countries
[14] Producers are encouraged to contact the EITI International Secretariat secretariat@eiti.org for support in finding and understanding supplier's reports.

Section 4. SUPPLIER RED FLAG EVALUATION

The Producer is expected to identify all intermediaries, consolidators, or other actors upstream in their supply chain through their management system[15]. This includes but is not limited to: traders who provide minerals to the Producer or the Producer's suppliers; parent companies of the Producer or the Producer's suppliers; and companies that have a controlling interest in the Producer or Producer's suppliers ("Relevant Companies"). The Producer then must identify whether any of the Relevant Companies operate in or source from CAHRAs[16].

If a Relevant Company operates in or sources minerals from a CAHRA, a potential OECD Red Flag is raised. Producers should verify through public sources, KYC checks, and engagement with suppliers to secure evidence (including spot checks as appropriate), that the supplier has strong company-wide due diligence management systems. If evidence is secured (and provided to the LME upon request) that minerals from a red flag location of mineral origin and transit have not entered the Brand's feedstock and the Relevant company has strong company-wide due diligence management systems, Producers may continue to use this template and follow the public disclosure requirements of the relevant Track. If no evidence is available, the supplier red flag remains and the Producer will be referred to Track A for enhanced due diligence with the support of an assurance framework[17].

Use the workbook to provide the following information:

a. Indicate where the "Relevant Companies" have operated in or sourced minerals during the Reporting Period.
b. Classify the locations provided in (a.) into either locations where no minerals are produced (such as headquarters, offices, or holding companies) or locations where minerals are produced.
c. Classify each country's CAHRA status:
   (i) A country of which no area falls into the CAHRA definition;
   (ii) A country of which all areas fall into the CAHRA definition; or
   (iii) A country of which some, but not all areas fall into the CAHRA definition. In this case, indicate whether the operations are located within the CAHRA in the comment column.
d. If any CAHRAs are identified, provide confirmation that the Producer has secured evidence that the origin or transit of the material entering their feedstock was not sourced from the CAHRA that raised the OECD supplier red flag and that the Relevant Company has strong company-wide due diligence management systems.

[15] OECD Guidance, page 34, which refers to the information expected to be collected by Producers on page 37

[16] The LME is aware that the OECD Guidance goes further on this point, including countries with limited reserves or production levels and countries where minerals from CAHRAs are known to transit; however, the LME considers these points to be adequately covered in Section 3.

[17] The LME provides a guidance note on this topic: https://www.lme.com/en/About/Responsibility/Responsible-sourcing#Guidance-notes-and-webinars

Section 5. RED FLAG ASSESSMENT		
a. Is there any Input Material for the LME Brand where the origin is unable to be determined?	☐ Yes	☑ No
b. Do any of the countries identified in Section 3 LOCATION OF MINERAL ORIGIN AND TRANSIT EVALUATION fall into the CAHRA areas identified in 3.d?	☑ Yes	☐ No
c. Do any of the source countries identified in Section 3 LOCATION OF MINERAL ORIGIN AND TRANSIT EVALUATION receive a quantity of material that is out of keeping with the source country's known reserves and expected production levels as answered in 3.e?	☐ Yes	☑ No
d. Do any of the countries identified in Section 3 LOCATION OF MINERAL ORIGIN AND TRANSIT EVALUATION fall into the list of countries known to transit materials from CAHRAs identified in 3.f?	☐ Yes	☑ No
e. Do any of the countries identified in Section 4. SUPPLIER RED FLAG EVALUATION fall into the CAHRA areas identified in 4.c without confirmation provided in 4.d?	☐ Yes	☐ No
f. Is the answer to any of Section 5.a – 5.e positive? If yes, the LME Brand is considered to have raised an OECD Red Flag and must use Track A.	☑ Yes	☐ No
g. Does the Producer fail to identify the EITI status of any of the source countries identified in Section 3 LOCATION OF MINERAL ORIGIN AND TRANSIT EVALUATION in 3.g.(i)?	☐ Yes	☑ No
h. Does the Producer fail to provide supplier's EITI disclosure information described in 3.g.(ii) for suppliers located in EITI-implementing countries?	☐ Yes	☑ No

i. Does the Producer believe that the Red Flag Assessment should result in a different outcome than indicated in 5.f? If so, then a full explanation must be given. Explanation: "[REDACTED]"	☑ Yes ☐ No

Additional comments:

As above.

	Country identification			Red Flag 1	Red Flag 2	Red Flag 3	EITI Implementation			
Question from RFA	**3.a. On the basis of the Producer's Company Management Systems for tracing the transit of materials from its operations and those of its suppliers, list all countries from which the minerals used for this Brand originated and transited through during the Reporting Period.**	**3.b. Identify whether each of the countries listed in (a.) is a source for the Brand material or a country through which the material only transits.**	**3.c. Specify the type of material being sourced or transited. This is optional to disclose and only requested to assist in answering the remaining questions.**	**3.d. Classify each country's Conflict-Affected or High-Risk Area ("CAHRA") status.**	**3.e. For each of the source countries identified, assess if the volume of mineral the Producer sourced during the Reporting Period is in keeping with the source country's known reserves and expected production levels. Provide the result of your assessment.**	**3.f. For each of the countries identified, assess if this country known to transit materials from CAHRAs.**	**3.g. For each of the source countries in (b.), assess the status of the supplier's Extractive Industry Transparency Initiative ("EITI") implementation following these steps**			**Additional comments**
Clarification of required answers	Please enter the country name.	Please enter "Source" or "transit only".	Optional: you may enter the type of material sourced if desired.	Please enter country CAHRA evaluation as "No CAHRAs", "Some CAHRAs", or "All CAHRA". For "Some CAHRAs", provide specific region in comments column K.	For source countries only: Please enter Yes or No for source countries and NA for transit only countries.	For all countries: Please enter Yes if known to transit materials from CAHRAs or No if not.	For source countries only: (i) State whether or not the country is an EITI-implementing country. Please enter Yes or No for source countries and NA (Not Applicable) for transit only countries.	For source countries only: (ii) If the supplier is located in an EITI-implementing country, identify if the supplier is in compliance with the EITI reporting requirements of that country. Provide links to the relevant company's submission for the purpose of EITI reporting, where such a disclosure does not reveal commercially sensitive information.	For source countries only: (iii) If the country is not an EITI-implementing country, identify if the supplier takes other steps to provide transparency on payments to governments and other matters in line with the aims of EITI. Provide link(s) to disclosures where available.	
	Sweden	*Source*	*Zn concentrate*	*No CAHRAs*	*Yes*	*No*	*No*	*NA*	*https://lundinmining.com/site/assets/files/9177/2022_sustainability_report_lundin_mining_aoda.pdf*	
	Bosnia&Hercegovina	*Source*	*Zn concentrate*	*No CAHRAs*	*Yes*	*No*	*No*	*NA*	*https://www.minecogroup.com/corporate-responsibility*	*They have to pay all the taxes acc.to law,but still cannot check if it is published by Ministry.*
	Serbia	*Source*	*Zn concentrate*	*No CAHRAs*	*Yes*	*No*	*No*	*NA*	*Yes.Reports annually to the governements body on extracted volumes of minerals and pay Mining Resources Extraction Tax acc.to national law.*	*We have their declaration but still cannot check if it is published by Ministry.Reports about the extracted minerals for the previous year must be given until 30.03. next year.*
	North Macedonia	*Source*	*Zn concentrate*	*No CAHRAs*	*Yes*	*No*	*No*	*NA*	*Yes.https;//www.sasa.com.mk/sustainability*	*They have to pay all the taxes acc.to law,but still cannot check if it is published by Ministry.*
	Montenegro	*Source*	*Zn concentrate*	*No CAHRAs*	*Yes*	*No*	*No*	*NA*	*Yes.Reports annually to the governements body on extracted volumes of minerals and pay Mining Resources Extraction Tax.*	*They have to pay all the taxes acc.to law,but still cannot check if it is published by Ministry.*
	Kosovo	*Source*	*Zn concentrate*	*No CAHRAs*	*Yes*	*No*	*No*	*NA*	*Yes.Reports annually to the governements body on extracted volumes of minerals and pay Mining Resources Extraction Tax.*	*They have to pay all the taxes acc.to law,but still cannot check if it is published by Ministry.Reports about the extracted minerals for the previous year must be given until 30.03. next year.*
	Turkey	*Source*		Some Cahras	*Yes*	*No*			*Yes.https;//www.esan.com.tr/en/sustainability/sustainability-approach-and-model#compliance-and-business-continuity*	Only Sirnak region in the EeastSout of Turkey is CAHRA.We Source material from western part of Turkey which is not CHARA.
	Slovakia	*Transit only*	*Zn concentrate*	*No CAHRAs*	NA	*No*	*NA*	*NA*		
	Hungary	*Transit only*	*Zn concentrate*	*No CAHRAs*	NA	*No*	*NA*	*NA*		
	Poland	*Transit only*	*Zn concentrate*	*No CAHRAs*	NA	*No*	*NA*	*NA*		

Question from RFA	4.a. Indicate where the Relevant Companies have operated in or sourced minerals during the Reporting Period.	4.b. Classify the locations provided in (a.) into either locations where no minerals are produced (such as headquarters, offices, or holding companies) or locations where minerals are produced.	4.c. Classify each country's Conflict-Affected or High-Risk Area ("CAHRA") status.	4.d. If any CAHRAs are identified, provide confirmation that the Producer has secured evidence that the origin or transit of the material entering their feedstock was not sourced from the CAHRA that raised the OECD supplier red flag and that the Relevant Company has strong company-wide due diligence management systems.
Clarification of required answers	Please enter the country name.	Please enter "No Mineral Production" or "Mineral Production"	Please enter country CAHRA evaluation as "No CAHRAs", "Some CAHRAs", or "All CAHRA".	
	Sweden	*Mineral Production*	*No CAHRAs*	
	Bosnia&Hercegovina	*Mineral Production*	*No CAHRAs*	
	Serbia	*Mineral Production*	*No CAHRAs*	
	North Macedonia	*Mineral Production*	*No CAHRAs*	
	Montenegro	*Mineral Production*	*No CAHRAs*	
	Serbia	*Mineral Production*	*No CAHRAs*	
	Kosovo	*Mineral Production*	*No CAHRAs*	
	Turkey	*Mineral Production*	*Some CAHRAs*	Only Sirnak region in the EeastSouth of Turkey is CAHRA, and there are extracted metals like Gold and TIN.
	Luxembourg	No Mineral Production	*No CAHRAs*	
	Switzerland	No Mineral Production	*No CAHRAs*	
	Great Britain	No Mineral Production	*No CAHRAs*	

Appendix 1: Attachments

1. URBA 360 mining activity report
2. Supply Chain Policy for a Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas
3. Code of Ethics
4. Anti-corruption policy