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]	
LME Brand name(s)[2,3]	
Reporting Period start date (DD/MM/YYYY)	01-Jan-2024
Reporting Period end date (DD/MM/YYYY)	31-Dec-2024
Date of submission (DD/MM/YYYY)	
Address of Brand producing site	
Website of Brand Producer	
Name of person submitting RFA	
Job title of person submitting RFA	
Phone number	
Email address	

[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.

The Brand follows supply chain due diligence processes of its managing owner, hereinafter referred to as 'the Company'.

The Company's Code of Conduct confirms the commitment to responsible and ethical business conduct and requires that risk-based third-party due diligence (TPDD) assessments are undertaken of third parties. The third-party risk management (TPRM) process, known as the Know Your Third Party (KYTP) Procedure, sets defined risk criteria, risk rating methodology and outlines the mandatory due diligence requirements and processes when engaging with third parties, whether it is a new engagement, renewed engagement, or extension of relationship.

The process ensures that risks represented are adequately identified, assessed managed and monitored, whether related to potential trade and economic sanctions, export controls, bribery and corruption, money-laundering/counter terrorism financing, other economic crime, enforcement actions, labour or human rights issues, denied party transactions, world bank debarments, adverse media, political exposure, health, safety and environmental violations/issues, or other ethical or reputational concerns (collectively referred to as 'business integrity risks'). This process is required for all third-party engagements, including suppliers, customers, contractors, vessels, acquisition targets and joint venture partners.

The Company uses a risk-based approach to determine the appropriate level of due diligence review to be performed on a third-party. Consideration is given to key risk indicators to determine the nature and scope of due diligence, including country risk, value of engagement and nature of the engagement. A list of high-risk activities has been identified that would always require a higher level of due diligence, which includes the supply of metal and minerals to the Company.

All third parties, including other parties to the transaction, must undergo baseline due diligence at a minimum, which includes screening of the third-party against the Company's internal watchlist and global sanctions, regulatory enforcement and other government watchlists. Third-party engagements that exceed the inherent risk criteria, or if risks were identified during the baseline due diligence, require a higher level of due diligence.

During the due diligence assessment, the Third-Party Risk Management Team will identify any potential red flags and risks related to business integrity risks. Upon completion of the due diligence review, a risk rating is applied using a consistent risk rating methodology and a due diligence report is issued to the relationship owner, which may include risk mitigation measures that must be applied prior to engaging the third-party. If the risks are significant and not capable of being remedied or managed, the engagement with the third party will be prohibited, or if an existing third-party, measures will be taken to exit the

[4] OECD Guidance, page 20

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

All employees are required to complete annual mandatory Ethics and Compliance training, which includes training on the KYTP Procedure, as part of the overarching Business Integrity Compliance Programme. Employees who engage with third parties undergo Supplier Management training relevant to their role. Details related to the overall programme (including due diligence processes) are published on the Company's intranet. The piloting of the new TPRM platform referred to in 2a, was accompanied with multiple targeted employee training sessions as part of the comprehensive change management plan for the pilot and group rollout of the new TPRM platform, supported by a dedicated resources centre. To communicate the due diligence process to suppliers, and the public more broadly, The Company's external facing website has a section on Responsible Value Chain that provides details on why and how the Company maintains supplier due diligence and ongoing monitoring.

Furthermore, suppliers have a dedicated section on the Company's website which includes details on working with the Company such as the Supplier Code of Conduct and a clear statement that the Company may choose not to work with suppliers who do not meet expectations. Below are some of the documents available for suppliers:

• Supplier Code of Conduct - comprising provisions on health and safety, business integrity, respect for others and the environment, as well as our expectations of suppliers during due diligence activities. Update was performed in Q3 2024, with greater prominence of due diligence processes.
• Cyber Security Requirements for Suppliers

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]

To oversee the implementation of the KYTP Procedure, a dedicated TPRM team has been established within the Company's Group Ethics & Compliance function under the leadership of the General Manager, TPRM, reporting to the Group's Chief Ethics & Compliance Officer. The TPRM team's role includes the responsibility to perform all due diligence assessments.

A TPRM Management Committee has been established to oversee the implementation of the TPRM program. Membership comprises senior management representatives from key functional areas.

The team reports to the Chief Ethics & Compliance Officer. The team has recently undergone changes to better reflect the risk management processes. All roles are within TPRM, with additional contractors supporting the TPRM team and individuals who report directly to assets that are considered higher risk due to their locations.

[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].

Minimum information required for all third-party due diligence requests include:
• Full legal name, incl. trading name and/or local language name
• Registered address & country
• Company registration number
• Type of business relationship
• Proposed scope of work (e.g. draft agreement)
• Payment details: name and country of payer/payee (if different to the third party), country of bank account
• Delivery details: country where goods will be delivered, or services rendered.
• Any other parties to the transaction
• For goods supply: country of origin of the goods (if known)
• Any adverse press, allegations or other information known by the requestor (including any affiliations that would give rise to a potential conflict of interest situation or other business integrity risks) about the third party or any of its directors, management, shareholders and/or beneficiaries.

Additional information may be required from the third party based on the level of due diligence applied. This is usually done by way of a third-party questionnaire, which includes questions on:
• Directors and owners
• Approach to compliance and other business integrity issues
• Approach to labour and human rights

Depending on the nature of the risks identified during the due diligence assessment, risk mitigation actions may be required to be completed prior to engagement with the third party, which may include specific contractual requirements.

All risk mitigation actions are recorded in the due diligence report, issued via email to the requestor and Relationship Owner. For High or Very High risk rated reports the risk mitigating actions are also recorded in the Group's Enterprise Risk Management platform. Once the piloted TPRM platform is launched in Q2 2025, all risk mitigation actions (irrespective of the risk rating, will be recorded and tracked in the TPRM platform. For the transacting and monitoring

[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]

For the 2024 reporting period, due diligence reviews were undertaken on 14,193 third parties across the Company:
• 7,834 baseline screening reviews
• 6,359 third-party due diligence reviews.

A total of 71,953 third parties were subject to ongoing monitoring.

A transformation of the TPRM program commenced in 2023 to optimize TPRM and remains on track for delivery in Q2 2025. The objectives include: reducing complexity; improving support for responsible carbon goals; enhanced sanctions compliance; provision of enhanced country risk management; reduction in crime risks; and reduction in corruption risks.

As the new process was introduced part-way through the 2024 reporting period as a pilot, data is not yet available within the new format. Once implementation is completed, data will be more accessible at Brand level, and enable distinguishing between supplier type.

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

The Company's has a dedicated confidential grievance mechanism and reporting programme. Anyone who has concerns or information relating to misconduct or improper circumstances or behaviours connected to the Company may raise such issues under the programme. This includes, just to name a few, current and former employees, contractors, suppliers, service providers, trainees, joint venture partners, members of the communities where the Company operate, and their partners, dependants, and relatives.

A person can safely and confidentially report concerns in several ways, including online, by telephone or email, across all countries in which the Company operates and in multiple languages.

Concerns and reports of misconduct are received and managed by the Business Conduct Office (BCO), a dedicated team that is independent of other lines within the business. The BCO work to ensure that reports are treated confidentially, fairly, respectfully, and safely. Matters that need specialist expertise are assigned to external experts. By using internal investigators and subject matter experts and/or external specialists, the Company can ensure that every matter is handled by the most relevant, independent, and knowledgeable party.

The reporting programme procedure is available on the Company's public 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]

Engaging with third parties in countries with high political, economic, or regulatory risks necessitates a higher level of due diligence than countries with a stable political and economic environment. The risk rating of the country where the third party will deliver the goods, services or project is an inherent risk indicator used to determine the minimum level of due diligence. Country risk is also considered having regard to the country of incorporation / registration, country of bank account and/or payment is being made to/received from, country of origin of goods and country of end destination. The country risk ratings are informed by a range of leading country risk indices relevant to business integrity risks, including sanctions, bribery and corruption, financial crime, human rights, conflict, and environment. The Country Risk Classification is reviewed at least annually. The following country risk classifications will always require a higher level of due diligence:

• Prohibited countries - Countries where comprehensive (i.e. country-wide) sanctions apply by the US Office of Foreign Assets Control, and any other countries deemed undesirable by the Company
• Restricted countries - Countries with significant presence of individuals and businesses included on the US Office of Foreign Assets Control's Specially Designated Nationals and Blocked Persons List, conflict regions, countries on the EU List of Non-Cooperative Jurisdictions list, restricted destinations per the Company's Export Controls procedure, and specific "free zones".
• High-risk countries - Countries with a score of Ò60 on Transparency International's Corruption Perceptions Index, EU CAHRA List, FATF grey listed countries, Global Slavery index and others.

For certain materials, where upstream provenance is crucial and a specific material framework exists, that framework is utilised. For example, engagements and products connected to renewable energy is subject to an enhanced due diligence process which, under certain conditions, require supply or value chain analysis. This process incorporates several risk indicators, including 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:	☐ Yes ☑ No

Additional comments:

	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.	
Example answers	*Country A*	*Source*	*Copper concentrate*	*No CAHRAs*	*Yes*	*No*	*Yes*	*Not in compliance*	*NA*	
	Country B	*Source*	*Alumina*	*Some CAHRAs*	*No*	*No*	*Yes*	*In compliance, report here: (link)*	*NA*	*Region ABC in Country B is considered a CAHRA and the materials we source do not come from this region.*
	Country C	*Transit only*	*Zinc oxide*	*All CAHRA*	*NA*	*Yes*	*NA*	*NA*	*NA*	
	Country D	*Source*	*Bauxite*	*No CAHRAs*	*Yes*	*No*	*No*	*NA*	*Reporting on payments to governments on page XX (link)*	
	Australia	Source	Bauxite; Alumina	no CAHRAs	Yes	No	No	NA	The Company's commitment to EITI can be found on the company's website Taxes Paid can be found on the company's website	The Brand's alumina supply is provided via conveyer from a single alumina supplier, and is provided with Certificate of Analysis including supplier address. The alumina supplier receives all bauxite from 2 Australian mines owned and operated by the Brand's own managing company. Shipping records including, captains logs, bill of lading, certificates of analysis, confirm the bauxite origin.

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".	
Example answers	*Country X*	*No Mineral Production*	*No CAHRAs*	
	Country Y	*No Mineral Production*	*Some CAHRAs*	*[Confirmation needed]*
	Country Z	*Mineral Production*	*All CAHRA*	*[Confirmation needed]*
	Australia	Mineral Production	No CAHRAs	NA
	Brazil	Mineral Production	Some CAHRAs	Whilst this is a country in which the Brand's managed partner operates, it is confirmed that all material for the brand was sourced within Australia during the reporting period, as per additional comments in 3 ORIGIN AND TRANSIT EVALUATION. Full Third Party Due Diligence was performed on the business operating within the country. The Brand's manging company Joint Ventures standard and procedures outline the requirements and application for any company entering into JV, and these are performance assessed, at a minimum, annually. These assessments include assurance activities on the JV management systems.
	British Virgin Islands	No Mineral Production	No CAHRAs	NA
	Canada	Mineral Production	No CAHRAs	NA
	France	No Mineral Production	No CAHRAs	NA
	Guinea	Mineral Production	Some CAHRAs	Whilst this is a country in which the Brand's managed partner operates, it is confirmed that all material for the brand was sourced within Australia during the reporting period, as per additional comments in 3 ORIGIN AND TRANSIT EVALUATION. Full Third Party Due Diligence was performed on the business operating within the country. As part of the Management Assistance Agreement, the brands managing company has members sit on the board and the sustainability committee, who work with the producing company to ensure that overarching systems and practices meet the brands requirements. The Brand's manging company Joint Ventures standard and procedures outline the requirements and application for any company entering into JV, and these are performance assessed, at a minimum, annually. These assessments include assurance activities on the JV management systems.
	Iceland	Mineral Production	No CAHRAs	NA
	Japan	No Mineral Production	No CAHRAs	NA
	Netherlands	Mineral Production	No CAHRAs	NA
	New Zealand	Mineral Production	No CAHRAs	NA
	Oman	Mineral Production	Some CAHRAs	Whilst this is a country in which the Brand's managed partner operates, it is confirmed that all material for the brand was sourced within Australia during the reporting period, as per additional comments in 3 ORIGIN AND TRANSIT EVALUATION. Full Third Party Due Diligence was performed on the business operating within the country. The Brand's manging company Joint Ventures standard and procedures outline the requirements and application for any company entering into JV, and these are performance assessed, at a minimum, annually. These assessments include assurance activities on the JV management systems.
	Russia	No Mineral Production	Some CAHRAs	It is confirmed that all material for the brand was sourced within Australia during the reporting period, as per additional comments in 3 ORIGIN AND TRANSIT EVALUATION. A minority shareholder of the alumina supplier is a company incorporated in the British Virigin Islands and is a subsidiary of a Russion owned group. An updated Third Party Due Diligence was conducted on the Alumina Supplier. This was triggered out of plan after changes in CAHRAs and sanctions changed involving Russia.
	Sweden	Mineral Production	No CAHRAs	NA