

LME Responsible Sourcing

Reflection and key updates from 2025

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SETTING THE GLOBAL STANDARD



Key LME responsible sourcing updates in 2025

Track A standard alignment assessment

- The European Commission has announced its recognition of the [RMI Tin and Tantalum Standard's](#) compliance with the EU Conflict Minerals Regulation following its completion of the [OECD Alignment Assessment process](#). As a result, the LME expects to be able to grant full approval of the standard upon publication of the final alignment assessment report

Brand compliance

- A streamlined compliance submission process was introduced, enabling producers to upload Track A audit reports and ISO certificates directly to LMEpassport for a simpler, more efficient workflow

Reporting

- In February 2026, the Red Flag Assessments (“RFA”) submitted in 2025 were published either in anonymised form on the [LME website](#) or as attributed versions on [LMEpassport](#), depending on brand producers’ preferences
- The Track C transparency requirements are moving to phase three in 2027 – all Track C brand producers will be required to disclose the attributed versions of their RFAs

Transparency

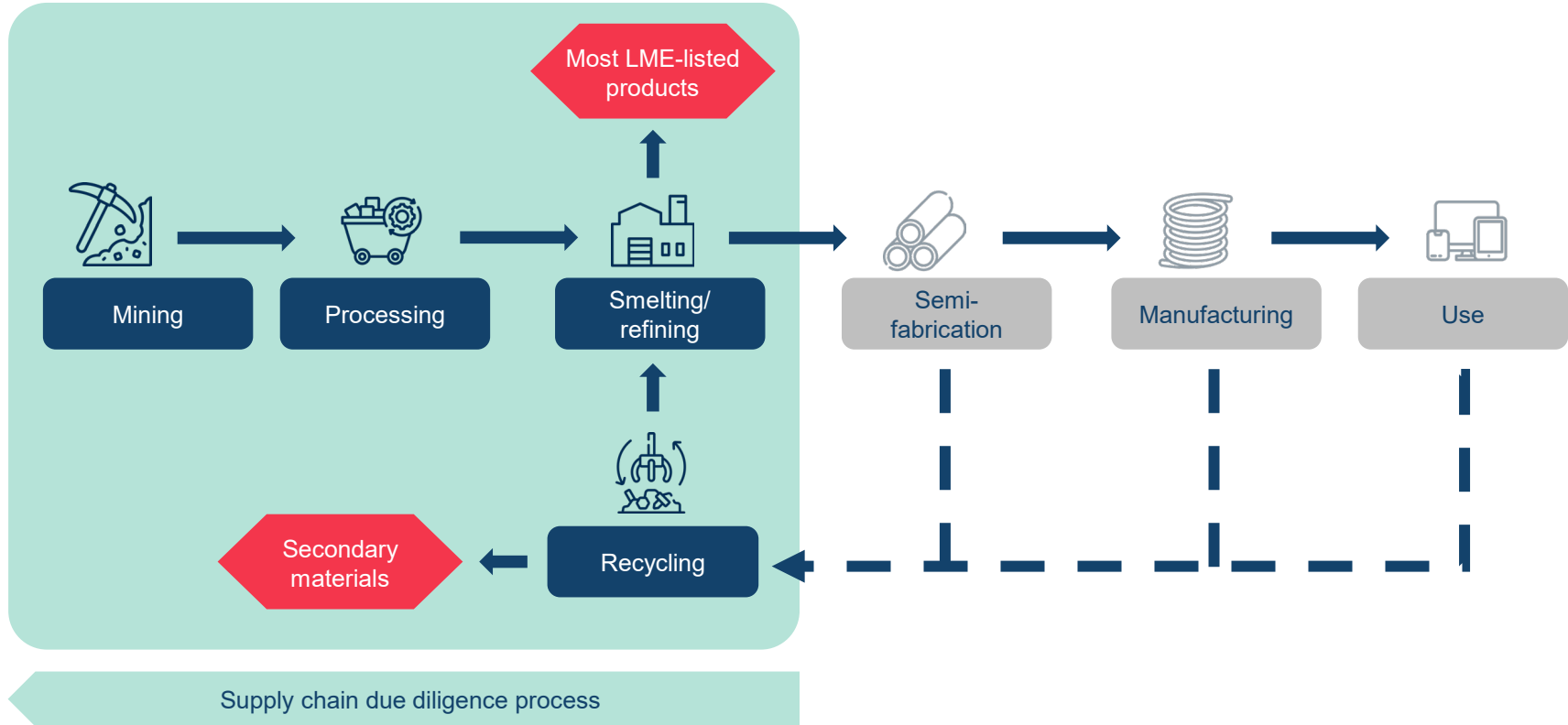
- The responsible sourcing compliance track, ISO certificates (or equivalents), and associated proof points for each LME-listed brand have been publicly available on LMEpassport since Q2 2025, as outlined in [Notice 25/065](#)
- There are 1,362 live sustainability disclosures on LMEpassport as of December 2025, across 57 different sustainability certifications and metrics

Stakeholder engagement

- Identifying the challenge in understanding Extractive Industries Transparency Initiative (“EITI”) principles in 2024, the LME contributed to the publication of the [Guide to using EITI data for due diligence](#) which supports producers in identifying and assessing governance risks in their mineral supply chains



LME responsible sourcing in the metal value chain



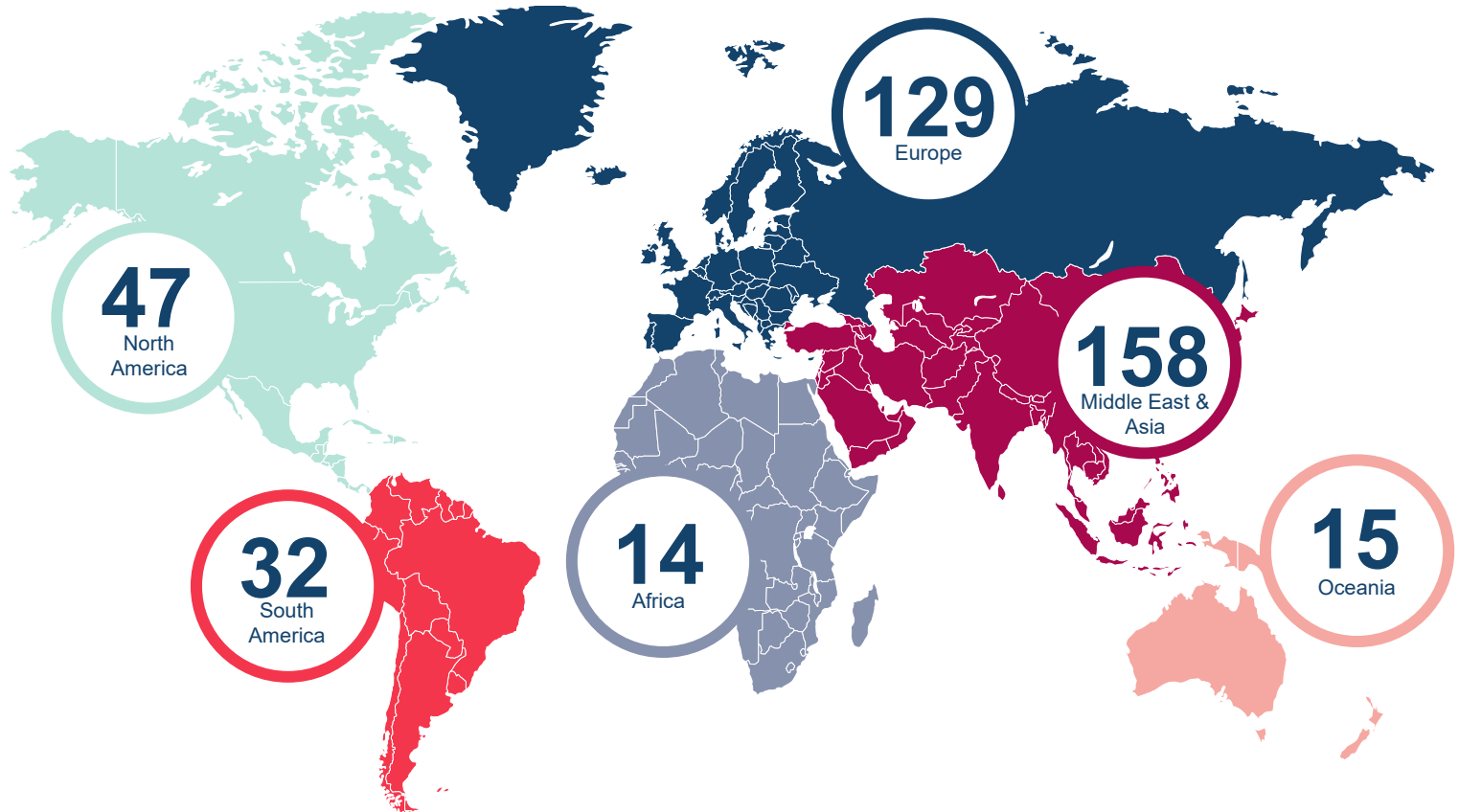
LME deliverable brands – breakdown by metals

Data as of 31 December 2025



LME-listed brand producer locations

Data as of 31 December 2025



Overview of brand listing requirements

Company and quality related requirements

- Minimum track record of 12 months in the business
- Minimum production capacity
- ISO 9001 (Quality Management System) certification
- Metallurgical quality assessment

Process related requirements

- LME Brand Listing Consultant or Category 1-4 member to process the brand application
- References from clients
- Brand listing fee US\$65,000
- Digital upload of electronic Certificates of Analysis (for aluminium, other metals (excluding copper))

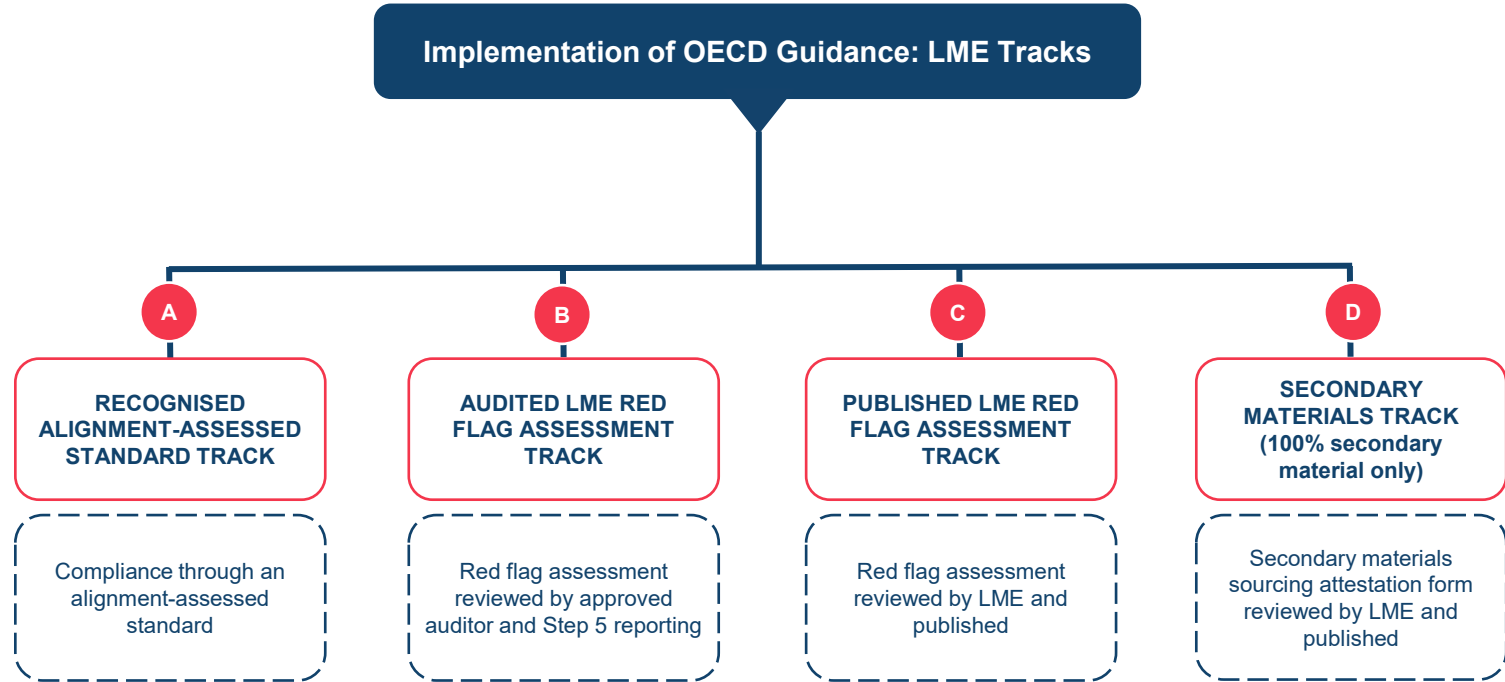
Sustainability related requirements

- Implementation of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas through Track A, B, C, or D
- ISO 14001 (Environmental Management System) certification or equivalent
- ISO 45001 (Occupational Health and Safety Management System) certification or equivalent
- Reporting of CBAM-related emissions (for aluminium)

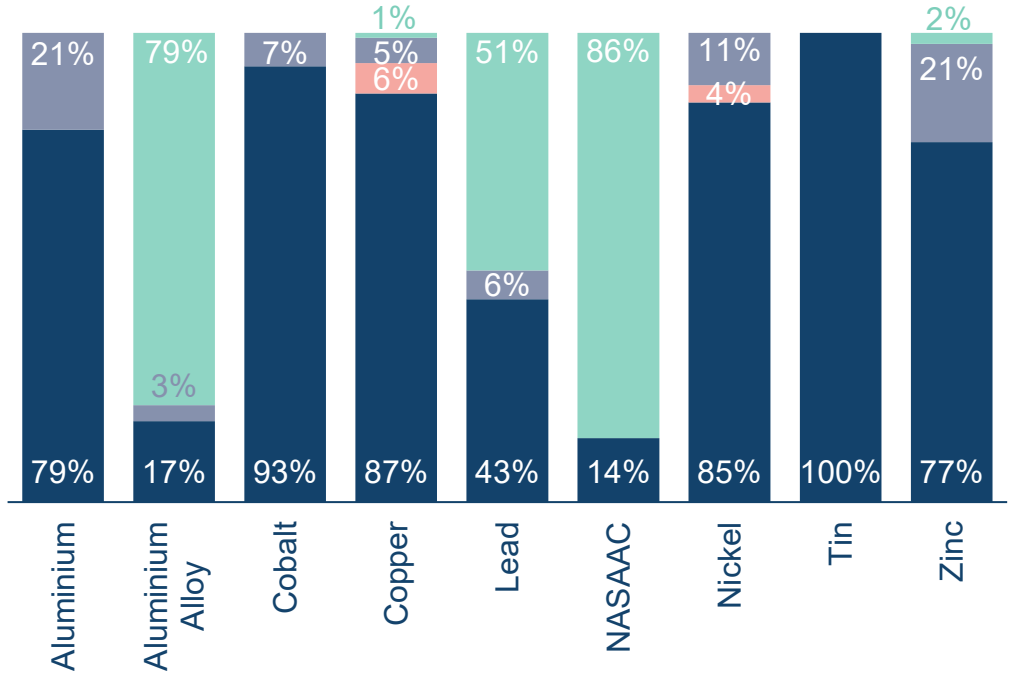
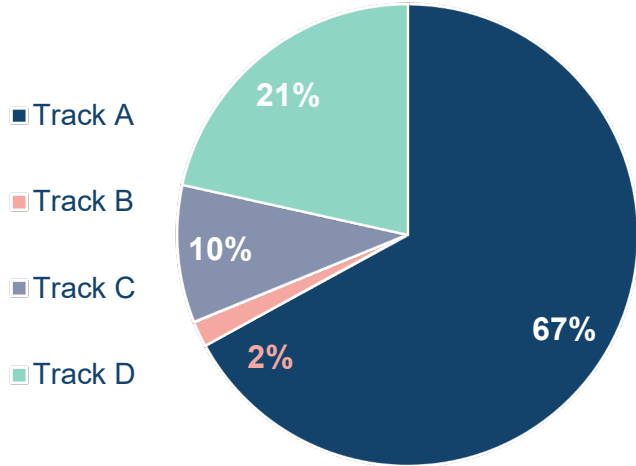
The LME supports the market in setting standards for deliverable metal by providing clear and consistent brand listing criteria, covering areas such as metallurgical quality, responsible sourcing requirements, and other internationally recognised benchmarks to ensure metals meet global expectations.



Summary of tracks to OECD Guidance implementation



Compliance track selection by metal

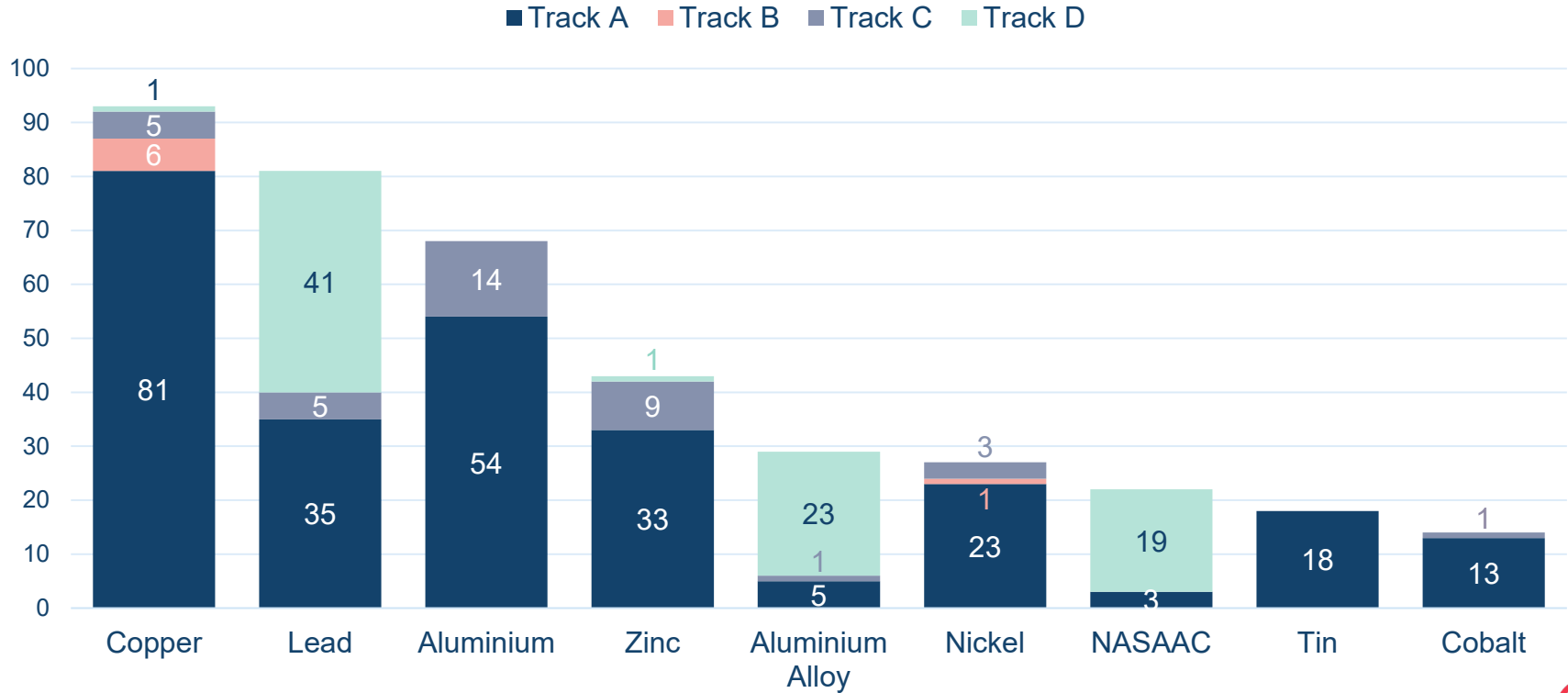


- Track A remains the most used track for meeting the OECD Due Diligence implementation requirement
- The number of brands using Track D increased by 25% from 2024 to 2025, with 10+ brands sourcing secondary materials listed or reinstated in 2025

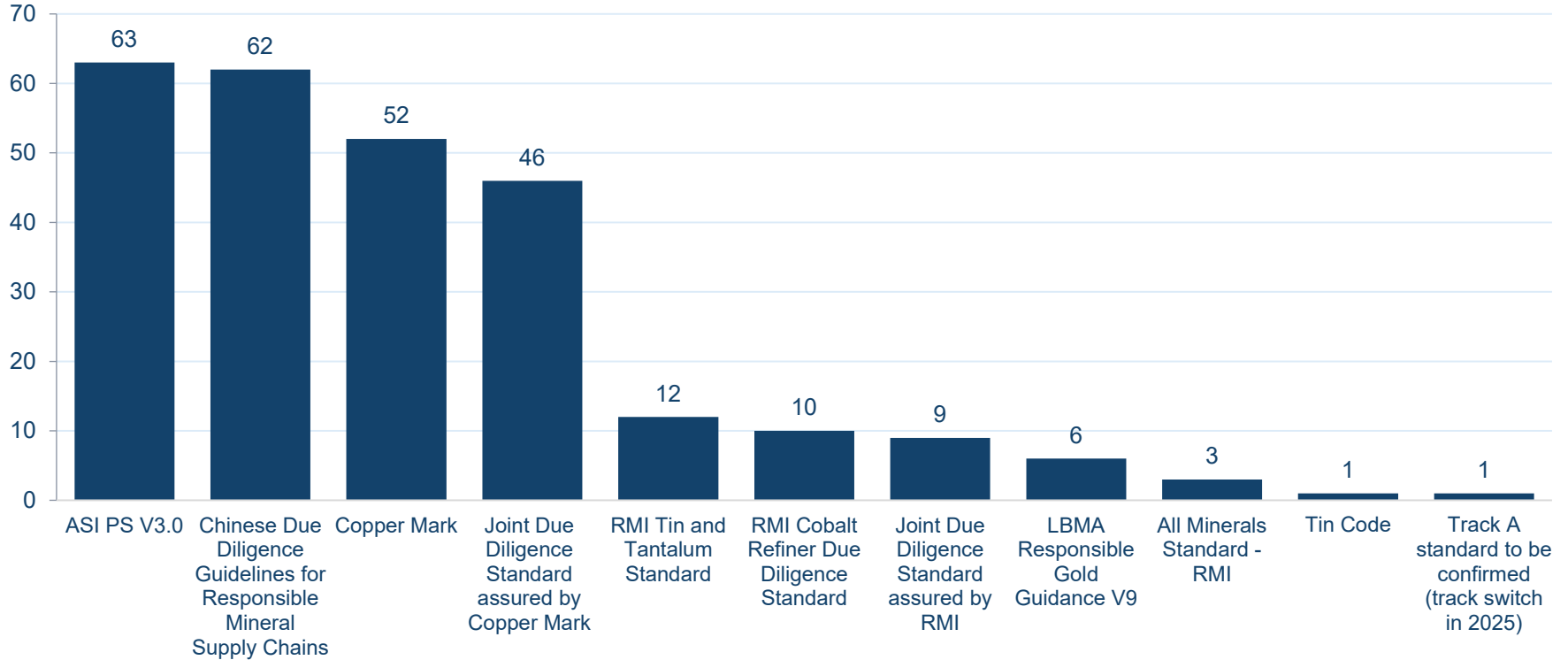


Track breakdown by metal

395 deliverable brands listed on the LME as of December 2025



Track A standard selection by brands 2025



ASI PS: Aluminium Stewardship Initiative Performance Standard

RMI: Responsible Minerals Initiative

LBMA: London Bullion Market Association

All Minerals Standard: Global Responsible Sourcing Due Diligence Standard for Mineral Supply Chains – All Minerals

Tin Code: Tin Code (Standard 7.3 Responsible Sourcing) assessed with the ITA-RMI Assessment Criteria



Track D summary

1. Explain whether the brand producer is relying solely on assurances from suppliers regarding the sources of material or on objective evidence.

2. List the corporate level checks that the brand producer conducts on its suppliers. Describe the management systems utilised in the supplier due diligence process.

- Most brand producers relied on a combination of supplier visits, delivery inspections, and quality testing to monitor compliance
- Others adopted alternative approaches, such as remote audits, supplier self-assessments, or digital traceability tools

- Responses varied from detailed procedures such as Supplier Codes of Conduct, ISO certifications, unique KYC forms, and audits, to reliance on regulatory frameworks or established relationships
- Similar to the responses from 2022 to 2024, producers continued to depend on quality management systems like ISO 9001
- Some producers implemented specific management systems for the responsible sourcing of minerals; government regulations remain a key factor in brand producers' supplier due diligence, whether at their own locations or those of their suppliers

To further understand market best practices for responsible recycling of metals, the LME will continue its engagement in the [Roundtable on the Responsible Recycling of Metals](#) which aims to integrate existing initiatives and develop standards, systems, and tools for the responsible production and sourcing of recycled metals.



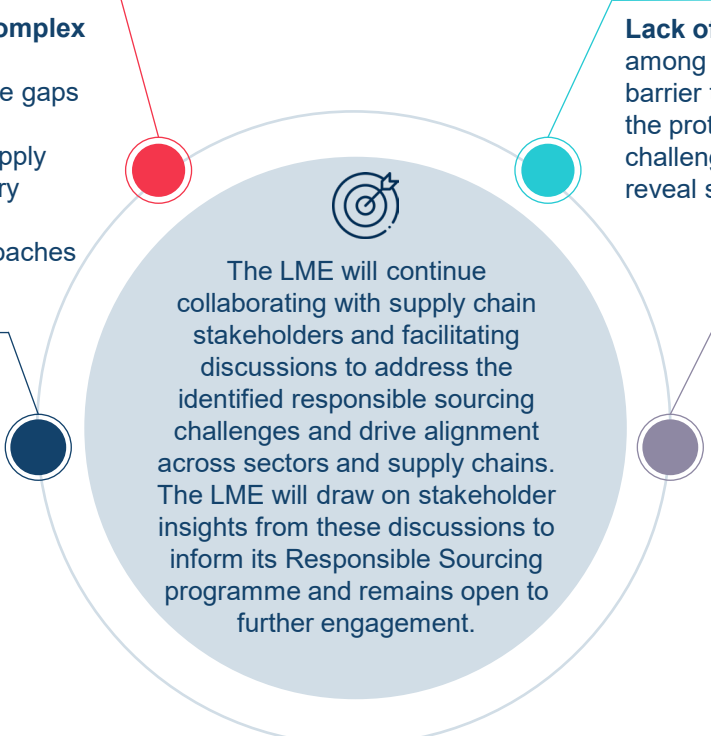
Responsible sourcing overview

The LME noted several recurring challenges from 2024, such as the lack of transparency in company corrective action plans, limited supply chain coordination, difficulties in implementing EITI principles, geopolitical tension and regulatory divergence. The key findings below highlight additional prevalent themes identified in 2025.

Secondary materials frequently involve complex and non-standardised due-diligence requirements

which can create due diligence gaps for recycled inputs. As the OECD Guidance framework is focused on primary material supply chains, it has limited applicability to secondary materials. The lack of similar guidance for secondary materials can lead to varied approaches to due diligence.

Responsible recycling has gained prominence as the discussions on responsible sourcing mature. With the global importance of metal recycling set to increase, it is critical that the associated environmental, social and governance risks are not overlooked.



The LME will continue collaborating with supply chain stakeholders and facilitating discussions to address the identified responsible sourcing challenges and drive alignment across sectors and supply chains. The LME will draw on stakeholder insights from these discussions to inform its Responsible Sourcing programme and remains open to further engagement.

Lack of alignment on due diligence transparency among industries and brand producers remains a key barrier to traceability. Balancing transparency with the protection of commercial confidentiality is challenging, as detailed disclosures can inadvertently reveal supplier and producer identities.

Variations in the scope and depth of responsible sourcing policies between metals and brand producers pose challenges for producers in understanding the OECD guidance's expectations and identifying industry best practices, hindering improvements or progress to be made in this area.



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