

# **Third-party assessment accordance to VO (EU) 2017/821 conflict minerals**



# **CRONIMET**

## **RAW MATERIALS**



Third-party conformity assessment accordance to VO (EU) 2017/821 **conflict minerals**  
Regulation (EU) 2017/821 (tantalum, tin, tungsten, and gold)

<b>company (union importers):</b>	CRONIMET Raw Materials GmbH (CRRM) Südbeckenstraße 22 76189 Karlsruhe
<b>other locations:</b>	Kipperstraße 11 44147 Dortmund
<b>Audit Type:</b>	Follow-up audit in accordance with Article 6 (1) of Regulation (EU) 2017/821
<b>assessed und locations and facilities</b>	Karlsruhe (headquarter) and Dortmund (sampling within the integrated management audit accordance to 9001/14001/45001)
<b>Which companies inside the group introduce 3TG in which area of validity?</b>	Only Cronimet Raw Materials inside the Cronimet group has to fulfill the requirements of the Regulation VO (EU) conflict minerals. In concrete terms they import exclusively Ferro-Wolfram and Ferrosiliciumwolfram.  area of validity: see below
<b>Project number:</b>	A-000750
<b>Reference period:</b>	calendar year 2024 and 01-09/2025
<b>Area of validity (definition of concern/ affected kinds of products or services/ Amount per year: tin, tantalum, tungsten, its mineral ores, gold):</b>	trade in ferroalloys (ferrotungsten)
<b>Board of Management: Representatives:</b>	Mr. Jürgen Pilarsky, Mr. Kunsmann Ms. Pia Puls (designated person accordance to article 4 VO EU 2017/821)
<b>QSHE-manual:</b>	IHB Integrated Handbook may 2023 (002/05/2023)
<b>Auditor:</b>	Mr. Martin Busch
<b>Date of audit:</b>	2025-10-30

## Summary assessment / goal of the inspection

In the context of the audit the auditor observes all activities, processes and systems of the union importer, which are able to fulfill the requirements of (EU) 2017/821 conflict minerals Regulation (EU) 2017/821 (tantalum, tin, tungsten, and gold), including the management system, the risk management and the responsible disclosure accordance to the regulation.

## The target is to determine if the union importer`s processes comply with the requirements of articles 4 to 7 of (EU) 2017/821 conflict minerals (due diligence in the supply chain).

In the context of the audit the auditor observes all questions in the business departments. While auditing the company could provide evidence of application the requirements. The application of the implementation could be inspected in practice through interviews and observations.

The area of validity could be confirmed.

All responsible people were present, and the audit could be performed completely.

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Non-conformities are summarized at the end of this report.

Recommendations to improve the due diligence in the supply chain are also summarized at the end of this report.

The audit is compliant with the OECD Guidelines due diligence in supply chain (independence, competence and accountability).

Accordance to the audit`s random character we point out that could be non-conformities in the company which not recognized while auditing. The auditor`s formulations do not disengage the company, to fulfill the requirements constantly.

## **Result of the inspection**

The union importer`s processes comply with the requirements of articles 4 to 7 of (EU) 2017/821 conflict minerals (due diligence in the supply chain).

The company has consistently implemented the requirements of the regulation.

Due to the lack of a white list according to the REGULATION (EU) 2017/821 Anex II and the unwillingness of potential suppliers to provide detailed third-party audit reports or to enable audits, there is currently only one approved supplier. This has a negative impact on the company's business operations.

Date: 2025-12-04

Auditor:

Martin Busch, M. Eng.

Unterschrift:



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