

Due Diligence Report 2025

AU-GT-L-03-12
25 / January 31, 2026
GT-L



Table of Contents

1	Summary	2
2	Governance and Management Systems	2
3	Due Diligence and Risk Management in the Supply Chain	2
3.1	Supplier Management and KYC	2
3.2	Chain of Custody (CoC)	3
4	Monitoring, Audits, and Training	3
5	Risk Management and Escalation Mechanisms	3
6	Environment, Human Rights, and Business Ethics	3
7	Audits in Fiscal Year 2025	4

Additional Documents	The Umicore Way	The Umicore Way
	Umicore Code of Conduct	Umicore Code of Conduct
	Umicore Sustainable Procurement	Umicore Sustainable Procurement Charter
	Responsible Supply Chain Policy	Umicore Responsible Global Supply Chain for Minerals from Conflict-Affected and High-Risk Areas
		Umicore PGM Policy Declaration.
	Integrated Annual Report	Umicore Integrated Annual Report
	OECD Guidelines	OECD Guidelines for the Implementation of Due Diligence to Promote Responsible Supply Chains for Minerals from Conflict-Affected and High-Risk Areas



 Michael Herkommer Managing Director Umicore Galvanotechnik GmbH	 Thilo Kuhn KYC Officer Umicore Galvanotechnik GmbH	 Harald Ziller RJC Compliance Officer Umicore Galvanotechnik GmbH
----------------------------------------------------------------------------------	---------------------------------------------------------------------	-----------------------------------------------------------------------------------

Due Diligence Report 2025

AU-GT-L-03-12
25 / January 31, 2026
GT-L



1 Summary

Umicore Galvanotechnik GmbH, as part of the Metal Deposition Solutions business unit, is committed to responsible, transparent, and sustainable business practices throughout the entire precious metals supply chain. This due diligence report describes the management systems and measures implemented to meet the requirements of the **Responsible Jewellery Council (RJC) Code of Practices 2024**.

Umicore Galvanotechnik GmbH is committed to continuously improving its processes and actively promoting responsible supply chain practices.

2 Governance and Management Systems

Umicore operates a group-wide and sustainability management system based, among other things, on the requirements of the OECD Due Diligence Guidance. At Umicore Galvanotechnik GmbH, this is implemented locally through binding guidelines, internal controls, and regular training sessions.

A commitment to honesty, ethics, and integrity forms the foundation for the trust of customers, business partners, and other stakeholders.

3 Due Diligence and Risk Management in the Supply Chain

The increasing demands from customers—particularly those in the jewelry industry—for precious metals from recycled sources, as well as regulatory developments (e.g., supply chain due diligence obligations), are actively addressed and used as a framework for continuous improvement.

Umicore Galvanotechnik GmbH implements risk-based supply chain management guided by the following principles:

- ✓ Application of the **OECD Guidelines for Responsible Supply Chains from Conflict-Affected and High-Risk Areas**
- ✓ Strict adherence to the **Umicore Sustainability Principles**
- ✓ Implementation of the **AU Supply Chain Due Diligence Policy on Precious Metals**
- ✓ Systematic **Know Your Counterparty (KYC) process**

3.1 Supplier Management and KYC

All suppliers are subject to a structured due diligence process. The KYC process is implemented across functions (Purchasing, Sales, Accounting) and ensures:

- ✓ Identification and assessment of business partners
- ✓ Verification of the conflict-free origin of materials
- ✓ Verification of suppliers' reliability and integrity

Suppliers are required to:

- ✓ acknowledge the Umicore Due Diligence Policy
- ✓ to supply only conflict-free materials
- ✓ to provide appropriate evidence (e.g., **CoC transfer documents**) to substantiate this



Due Diligence Report 2025

AU-GT-L-03-12
25 / January 31, 2026
GT-L



3.2 Chain of Custody (CoC)

Umicore Galvanotechnik GmbH is a certified member of the **Responsible Jewellery Council (RJC)** and complies with both:

- ✓ the **Code of Practices (CoP)**
- ✓ and the **Chain of Custody (CoC) Standard**

The product chain requirements are implemented through defined processes in materials management and production (CoC production).

4 Monitoring, Audits, and Training

The effectiveness of the due diligence system is regularly reviewed through:

- ✓ internal audits (conducted every two years with a focus on CoC and KYC)
- ✓ Review of procedural guidelines and workflows
- ✓ continuous improvement of processes

Regular employee training promotes a deep understanding of responsible supply chains and compliance requirements.

5 Risk Management and Escalation Mechanisms

Umicore Galvanotechnik GmbH actively influences its supply chain to prevent violations.

When risks are identified, the following applies:

- ✓ Assessment and documentation of the risk
- ✓ Implementation of appropriate measures
- ✓ **Termination of the business relationship** if serious violations are detected

Complaint mechanisms enable employees and external stakeholders to report concerns regarding the supply chain or traceability.

6 Environment, Human Rights, and Business Ethics

Compliance with human rights, labor standards, environmental requirements, and ethical business conduct is an integral part of the corporate strategy. This includes, among other things:

- ✓ Prohibition of child labor and forced labor
 - ✓ Ensuring occupational safety and health protection
 - ✓ Reducing environmental impact
 - ✓ Zero tolerance for corruption
-



Due Diligence Report 2025

AU-GT-L-03-12

25 / January 31, 2026

GT-L



7 Audits in Fiscal Year 2025

The following risk areas were examined as part of the due diligence processes:

1. Human Rights (Mining, Transportation, and Trade of Gold and PGMs)
2. Activities of non-state armed groups and security forces
3. Bribery and fraudulent declarations of origin
4. Money laundering and terrorist financing
5. Labor rights, working conditions, and health and safety
6. Environmental protection and resource conservation

Result:

- ✓ **No incidents in fiscal year 2025**
- ✓ **No substantiated suspicion of violations**

