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# ***Independent Practitioner's Reasonable Assurance Report***

Heraeus Deutschland GmbH & Co. KG  
Hanau

Reasonable assurance engagement on the LPPM Refiner's Compliance Report for Heraeus Deutschland GmbH & Co. KG for the period from 1 January to 31 December 2019

Auftrag: 0.0926316.001



**Independent Practitioner's Reasonable Assurance Report**

To Heraeus Deutschland GmbH & Co. KG

We have been engaged by Heraeus Deutschland GmbH & Co. KG, Hanau, (the "Refiner") to perform a reasonable assurance engagement on the Refiner's Compliance Report prepared by the Refiner for the business group Heraeus Deutschland GmbH & Co. KG (HDE) as defined in Table 5 of the Compliance Report for the period from 1 January to 31 December 2019 (the "Refiner's Compliance Report").

**Management's Responsibility**

The Management of the Refiner is responsible for the preparation and presentation of the Refiner's Compliance Report in accordance with the LPPM Responsible Platinum/Palladium Guidance (version 2) as of February 2020 (the "Platinum/Palladium Guidance").

This responsibility includes establishing appropriate risk management and internal controls from which the reported information is derived. The criteria identified by management as relevant for demonstrating compliance with the Platinum/Palladium Guidance are the activities described in the Refiner's Compliance Report. Furthermore, the responsibility includes designing, implementing and maintaining systems and processes relevant for the preparation of the Refiner's Compliance Report, which is free of material misstatements due to intentional or unintentional errors.

**Audit Firm's Independence and Quality Control**

We have complied with the German professional provisions regarding independence as well as other ethical requirements.

Our audit firm applies the national legal requirements and professional standards – in particular the Professional Code for German Public Auditors and German Chartered Auditors ("Berufssatzung für Wirtschaftsprüfer und vereidigte Buchprüfer": "BS WP/vBP") as well as the Standard on Quality Control 1 published by the Institut der Wirtschaftsprüfer (Institute of Public Auditors in Germany; IDW): Requirements to quality control for audit firms (IDW Qualitätssicherungsstandard 1: Anforderungen an die Qualitätssicherung in der Wirtschaftsprüferpraxis - IDW QS 1) – and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

**Practitioner's Responsibility**

Our responsibility is to express an opinion on the Refiner's Compliance Report based on our work performed. Within the scope of our engagement we did not perform an audit on external sources of information or expert opinions, referred to in the Refiner's Compliance Report.

We conducted our work in accordance with the International Standard on Assurance Engagements (ISAE) 3000 (Revised): "Assurance Engagements other than Audits or Reviews of Historical Financial Information" published by IAASB and the supplementary guidance as set out in the LPPM Responsible Sourcing Programme – Third Party Audit Guidance as of 15 October 2018 (version 1). This standard requires that we plan and perform the assurance engagement to obtain reasonable assurance whether the Refiner's Compliance Report, prepared by the Refiner for the business group Heraeus Deutschland GmbH & Co. KG (HDE) for the period from 1 January to 31 December 2019, in all material aspects, describes fairly the activities undertaken during the year to demonstrate compliance, and management's overall conclusion contained therein is in accordance with the requirements of the LPPM Responsible Platinum/Palladium Guidance (version 2) as of February 2020.

A reasonable assurance engagement involves performing procedures to obtain sufficient appropriate evidence whether the Refiner's Compliance Report, prepared by Heraeus Deutschland GmbH & Co. KG, Hanau, for the business group Heraeus Deutschland GmbH & Co. KG (HDE) for the period from 1 January to 31 December 2019, in all material aspects, describes fairly the activities undertaken during the year to demonstrate compliance, and management's overall conclusion contained therein is in accordance with the LPPM Responsible Platinum/Palladium Guidance (version 2) as of February 2020.

The procedures selected depend on the practitioner's judgement. This includes the assessment of the risks of material misstatements of the Refiner's Compliance Report with regard to the Platinum/Palladium Guidance. Within the scope of our work we performed amongst others the following procedures:

- Interviews with the compliance officers in charge of the preparation of the Refiner's Compliance Report;
- Interviews with management and employees of departments in charge of recycling, purchasing, material management and trading;
- Inspection of relevant corporate guidelines and documents describing the management systems, due diligence and risk management approach towards a responsible supply chain;
- Review of documentation of requirements on the group-wide processes for collecting, analyzing and aggregating data on the supply chain of platinum and palladium;
- Performance of onsite visits at the Refiner's locations in Hanau (Germany), Hong Kong (China) and Santa Fe Springs (USA) as part of the inspection of relevant systems, processes and controls; including process walkthroughs from supplier selection to materials receipt and lot processing;
- Performance of a virtual site visit (due to the COVID-19 pandemic) at the Refiner's location in Port Elizabeth (South Africa) as part of the inspection of relevant systems, processes and controls; including virtual process walkthroughs from supplier selection to materials receipt and lot processing as well as a virtual tour of the production site in accordance with the requirements as set out in the LPPM Virtual Auditing – Policy and Procedure as of 29 May 2020 (version 1);
- Performance of the virtual site visit under the same standards as applicable during onsite visits, however supported by the use of technology effective to complete the relevant assurance procedures, adequate to ensure accordance with relevant data privacy policies and agreed with the Refiner prior to the virtual site visit, including laptops and computer, video cameras, screen sharing technology and video-conferencing with end-to-end encryption;
- At the start of virtual interviews, inspection of official photographic identification of interviewees;
- Evaluation of the consistency of the statements provided in the Refiner's Compliance Report with the findings obtained during our engagement.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

**Inherent limitations**

Non-financial information, such as that included in the Refiner's Compliance Report, is subject to more inherent limitations than financial information, given the more qualitative characteristics of the subject matter and the methods used for determining such information. The methods used by the Refiner to comply with the Platinum/Palladium Guidance may differ. It is important to read the Refiner's conflict minerals supply chain policy available in the download section on Refiner's website:

<http://herae.us/conflictminerals>

**Conclusion**

In our opinion and based on our reasonable assurance procedures performed, as described above, the Refiner's Compliance Report, prepared by Heraeus Deutschland GmbH & Co. KG, Hanau, for the business group Heraeus Deutschland GmbH & Co.KG (HDE) for the period from 1 January to 31 December 2019, in all material aspects, describes fairly the activities undertaken during the year to demonstrate compliance, and management's overall conclusion contained therein is in accordance with the LPPM Responsible Platinum/Palladium Guidance (version 2) as of February 2020.

**Restriction on Use and Distribution**

We issue this report on the basis of the engagement agreed with the Refiner. The audit has been performed for purposes of the Refiner and is solely intended to inform the Refiner about the results of the audit. The report is not intended for any third parties to base any (financial) decision thereon. We do not assume any responsibility towards third parties.

We refer to the fact that the Refiner's Compliance Report subject to our assurance engagement comprises the Annex "List of countries of origin of mined platinum and palladium" and the treatment of the Refiner. According to the LPPM Responsible Platinum/Palladium Guidance (version 2) as of February 2020, this Annex detailing the countries of origin of mined platinum and palladium has to be submitted to the LPPM Executive only and does not need to be disclosed publicly.

Munich, 19 August 2020

PricewaterhouseCoopers GmbH  
Wirtschaftsprüfungsgesellschaft

Hendrik Fink  
Wirtschaftsprüfer  
(German Public Auditor)

ppa. Mirjam Kolmar

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## ***Appendix***

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Allgemeine Auftragsbedingungen für Wirtschaftsprüfer und  
Wirtschaftsprüfungsgesellschaften vom 1. Januar 2017

General Engagement Terms for Wirtschaftsprüfer and Wirtschaftsprüfungsgesellschaften  
[German Public Auditors and Public Audit Firms] as of January 1, 2017

# Heraeus LPPM Compliance Report 2019 for HDE

## Addendum

Table 5: Relevant for the audit are the following Heraeus companies:		
Business Group:	Value Chain Step	Locations:
<b>Heraeus Deutschland - HDE</b>		
Heraeus Deutschland GmbH & Co. KG	Refiner (LPPM GD Status)	Hanau, Germany
Heraeus Ltd.	Refiner (LPPM GD Status)	Hong Kong; People's Republic of China
Heraeus South Africa (Pty.) Ltd.	Refiner (LPPM GD Status)	Port Elizabeth; South Africa
Heraeus Precious Metals North America LLC	Refiner (LPPM GD Status)	Santa Fee Springs, CA & Conshohocken, PA, USA

**Heraeus**

Heraeus Deutschland GmbH & Co. KG

Global Business Unit  
Heraeus Precious Metals  
Heraeusstr. 12-14  
63450 Hanau, Germany

i.V. Dr. Juergen Mueller-Schaefer

Hanau, March 18. 2020

# Heraeus LPPM Compliance Report 2019 for HDE

Table 1: Refiner's details	
Refiner's name	Heraeus Deutschland GmbH & Co. KG – [HDE]
location	Heraeusstr. 12-14 D-6450 Hanau, Germany
Reporting year-end	31.12.2019
Date of Report	28-10-2020
Senior Management at HDE responsible for this report:	Andre Kobelt, CEO of HDE: <a href="mailto:andre.kobelt@heraeus.com">andre.kobelt@heraeus.com</a>
<p>A globally leading technology group, Heraeus is headquartered in Hanau, Germany. Founded in 1851, it is a family-owned portfolio company which traces its roots back to a pharmacy opened by the family in 1660. Today, Heraeus combines businesses in the environmental, energy, electronics, health, mobility and industrial applications sectors.</p> <p>In the 2018 financial year, Heraeus generated revenues of €20.3 billion with approximately 15.000 employees in 40 countries. Heraeus is one of the top 10 family-owned companies in Germany and holds a leading position in its global markets. More at: <a href="http://www.heraeus.com">www.heraeus.com</a></p> <p>Heraeus operates currently 5 Good Delivery refiners under the LPPM scheme: Germany, Hong Kong, USA and South Africa. Argor-Heraeus in Mendrisio, Switzerland - 100% owned by Heraeus - publishes its own dedicated LBMA/LPPM compliance report, which you can find at: <a href="https://www.argor.com/en/responsibility">https://www.argor.com/en/responsibility</a>.</p>	

## Heraeus evaluation

Table 2: Summary of activities undertaken to demonstrate compliance
<b>Step 1: Establish strong company management systems</b>
<b>Compliance Statement with Requirement:</b> We have fully complied with Step 1: Establish strong management systems.
<b>1. Has the refiner adopted a company policy regarding due diligence for supply chains of Platinum and Palladium?</b>
The Heraeus group has adopted a company-wide policy binding for all entities (including HDE's refinery and downstream entities) regarding due diligence for the supply chain of conflict minerals including Gold, Tin, Tungsten and Tantalum as well as the other precious metals Silver, Platinum, Palladium, Rhodium, Iridium, Ruthenium and Osmium.
<b>Comments and Demonstration of Compliance:</b> Already in 2007 we started formalizing our supply chain policy for Precious Metals, which is based on our Code of Conduct and an integral part of our responsibility-conscious management structure. <p>HDE operates strictly in accordance with LPPM's "Responsible Platinum/Palladium Guidance" V1, June 2018 and the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" – Third edition 2016.</p> <p>We updated our Supply-Chain policy in 2018 to reflect the fact, that besides the traditional conflict minerals Gold, Tin, Tungsten and Tantalum, we also adopted the same company-wide binding procedures for Silver, Platinum, Palladium, Rhodium, Iridium, Ruthenium and Osmium. It can be found on our website in the downloads section: <a href="http://www.herae.us/conflictminerals">www.herae.us/conflictminerals</a>.</p> <p>Besides our Supply-Chain Policy we also updated our Anti-Money laundering guideline to further strengthens and fine-tune our efforts in that area.</p> <p>In addition, we introduced our new "Human Rights policy", based on the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the corresponding fundamental Conventions and the UN Guiding Principles on Business and Human Rights as well as on the above mentioned OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas.</p>



# Heraeus LPPM Compliance Report 2019 for HDE

<p>With that policy, Heraeus emphasizes to reasonably ensure that the precious metals in its supply chain originate from legal and ethical sources, that the precious metals are not associated with crimes, armed conflicts or human rights abuses and that they will not be used for money laundering, financing terrorism, tax evasion, fraud or any other crime.</p>
<p><b>2. Has the refiner set up an internal management structure to support supply chain due diligence?</b></p>
<p>Heraeus Precious Metals has set up an internal management structure to support supply chain due diligence.</p>
<p><b>Comments and Demonstration of Compliance:</b>  An internal management system has been set up to define the governance, roles and responsibilities, internal audit, communication and senior management review as per the adopted policy. The assigned compliance officer on group level designs, supervises and reviews the overall process and is supported by local compliance officers of all entities included in this report. The compliance officer has a direct reporting line to the executive committee.</p>
<p><b>3. Has the refiner established a strong internal system of due diligence, controls and transparency over the supply chains of Palladium and Platinum, including traceability and identification of other supply chain actors?</b></p>
<p><b>Comments and Demonstration of Compliance:</b>  <u>Refiner units:</u>  We have a robust 'lot' receipts process, and specific documents must be received, and transactional details entered before we process any precious metal-bearing (Gold, Silver, Platinum and Palladium) and other conflict materials, like Tin, Tantalum and Tungsten. Each lot received is accurately registered in our transactional system and ensures complete traceability within our production streams. We carry out specific controls regarding received materials before processing incoming material as outlined in our internal guidelines.</p> <p>Through regular training of our employees we ensure that our guidelines are followed through; any form of non-conformance is unacceptable and reported to the compliance officer and senior management.</p> <p>No such escalation was necessary during the reporting period.</p>
<p><b>4. Has the refiner strengthened company engagement with Platinum and Palladium supplying counterparties, and where possible, assist Palladium and Platinum supplying counterparties in building due diligence capabilities?</b></p>
<p><b>Comments and Demonstration of Compliance:</b>  All new suppliers must sign the regularly updated version of our "CODE OF CONDUCT MATERIAL QUESTIONNAIRE FOR PM SUPPLIERS OF HERAEUS" before we are entering into a new business relationship. For corporations having made available to us their own responsibility guidelines covering and ensuring comparable compliance, acceptance is based on our risk assessment. However, we encountered that we did not have enough documentation for some customers to justify our rating decisions. So we further sharpened-up our documentation and have addressed that already for the rating of new or existing customers since beginning of 2020.</p> <p>We are renewing our due diligence checks for all our suppliers in one, two- or three-years intervals based on the risk assessment we conducted in our KYC workflow and the results are archived in a database.</p> <p>We conducted several successful on-site audits of new mining partners as well as existing mining partners, which were up for re-audit based on our risk assessment. This is to verify they are in line with the requirements set forth in our supply chain guideline, with special focus on Child labor, Human rights and environmental issues.</p> <p>In the reporting year, we continued to be actively engaged in various business organizations like IPA (International Platinum organization), EPMF (European Precious Metals Federation, FVEM (Fachvereinigung Edelmetalle) and in addition we organized events for Heraeus' customers to promote awareness and due diligence measurements regarding Gold, Silver, Platinum and Palladium as well as Tin, Tantalum, and Tungsten and what Heraeus is doing in this regard.</p> <p>We are a founding member of the "Fabricators Working Group" – FWG – promoting a "one mine, one audit" approach by developing a system for sustainability audits of Platinum group mines, currently focusing on South Africa, where there was an agreement reached to a set of principles aiming at:</p> <ul style="list-style-type: none"> <li>- Sustainability and transparency in PGM supply chains</li> <li>- Manage risks and create business value along the PGM value chain</li> <li>- Facilitate good practice exchange, collaboration and engagement in response to challenges along the supply chain</li> </ul>

# Heraeus LPPM Compliance Report 2019 for HDE

## 5. Has the refiner established a company-wide communication mechanism to promote broad based employee participation and risk identification to management?

### Comments and Demonstration of Compliance:

Besides the possibility to raise compliance violations through internal channels, Heraeus is also offering an external compliance hotline giving employees the opportunity to voice concerns over any compliance violations anonymously and especially over our Precious Metals (Gold, Silver, Platinum and Palladium) and also Tin, Tantalum and Tungsten supply chain or other identified risks regarding conflict minerals. Our external Compliance Hotline can be contacted by e-mail in any language or by telephone in German and English; that information was widely published throughout our organization and is readily available on our company intranet as well as internet; contact :

[https://www.heraeus.com/media/media/group/doc\\_group/corporate\\_responsibility\\_1/Compliance\\_Hotline\\_EN.pdf](https://www.heraeus.com/media/media/group/doc_group/corporate_responsibility_1/Compliance_Hotline_EN.pdf)

However, no concerns were raised by employees in the reporting year 2019 with regards to conflict minerals.

## Step 2: Identify and assess risks in the supply chain

### Compliance Statement with Requirement:

We have fully complied with Step 2: Identify and assess risks in the supply chain.

## 1. Does the refiner have a process to identify risks in the supply chain?

Heraeus has processes in place to identify the risks in the supply chain

### Comments and Demonstration of Compliance:

We identify and assess risks in the supply chain. For every supplier we have established a client database and allocated a risk profile according to our risk profile criteria. This process is a formal requirement before entering any business relationship with any Precious Metals counterparty, including but not limited to Gold, Silver, Platinum and Palladium as well as Tin, Tungsten and Tantalum supplying counterparties. Our due diligence process is carried out on a risk-based approach and follows our requirements as outlined in our "Code of Conduct for Precious Metal Suppliers of Heraeus".

We do model our KYC process by using flow charts – separated for Precious Metals (Gold, Silver, Platinum and Palladium) and 3T. We review and refine these models on a regular base and as deemed necessary. These process models help us to clearly structure and identify possible risks in our supply chain and are also ideal training tools for our customer service teams.

Besides monitoring government regulations and reports from United Nations, we further formalized this step and use a list of web links from NGO's and other international organizations we are regularly monitoring and if necessary, expanding – at least quarterly.

We use indices like "Conflict Barometer 2018" from Heidelberg Institute for International Conflict Research, "Basel AML Index 2019" from Basel Institute of Governance, "FREEDOM IN THE WORLD 2019" from Freedom House and the "Corruption Perception Index 2018" from Transparency International to develop our own extensive list of high-risk countries. Any business partners from those countries would need to undergo enhanced due diligence measures and require 4-eye approval.

The results of that screening are evaluated and help us further strengthening our risk identifying steps and are included in our general Risk Management System and therefore regularly reviewed.

## 2. Does the refiner assess risks in light of the standards of their due diligence system?

Heraeus assesses the risk in light of the standards of our due diligence system

### Comments and Demonstration of Compliance:

Refiners units:

Supply chain due diligence comprising all measures required by the LPPM is performed before entering into a business relationship with any Gold, Silver, Platinum, Palladium, Tin, Tantalum and Tungsten supplying counterpart. We performed enhanced due diligence for higher risk categories, which includes all precious metal-bearing mining material and where Gold, Silver, Palladium and Platinum potentially originates from or transits via conflict affected areas and areas with human rights abuse, child labor or other high-risk factors. In addition, we conduct appropriate scrutiny and monitoring of transactions undertaken through the course of the relationship following a risk-based approach.

In case our due diligence assessment leaves any doubts, we request additional documentations from our partners by using the "pushback" functionality of our KYC system. We might suspend our business relationship with existing partners or refuse to open a relationship with new partners. To enforce our supply chain policy in the reporting year,

# Heraeus LPPM Compliance Report 2019 for HDE

we refused to enter into new business relationships with a notable number of potential partners, especially in the case of precious metals supply for various reasons.
<b>3. Does the refiner report risk assessment to the designated manager?</b>
<p><b>Comments and Demonstration of Compliance:</b></p> <p>The compliance officers and their teams assess the potential risks in-line with Heraeus internal guidelines as well as the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas as set out in the Annex II. If high risks are identified with new or existing business partners, the Compliance Officer will deny acceptance of new business partner or cancel business with existing partners.</p> <p>Only if the business disagrees with the assessment of the compliance officer, the issue will be escalated to the CEO or CFO for final decision; no such escalation was necessary during the reporting period.</p> <p>Our company policy introduced in November 2018 strengthened and clarified the mandate of the compliance officer with a clearly defined "RAPID" model, also with regards to the responsibility for the supply chain of Gold, Silver, Platinum, Palladium, Tin, Tungsten and Tantalum.</p> <p>(In the RAPID-model „R“ stands for „Recommend“, „A“ for „Agree“, „P“ for „Perform“, „I“ for „Input“ and „D“ for „Decide“).</p>
<b>Step 3: Design and implement a management system to respond to identified risks</b>
<p><b>Compliance Statement with Requirement:</b></p> <p>We have fully complied with Step 3: Design and implement a management system to respond to identified risks.</p>
<b>1. Has the refiner devised a strategy for risk management of an identified risk by either (i) mitigation of the risk while continuing to trade; (ii) mitigation of the risk while suspending trade or (iii) disengagement from the risk</b>
Heraeus has devised a strategy for risk management of an identified risk by either (i) mitigation of the risk while continuing to trade; (ii) mitigation of the risk while suspending trade or (iii) disengagement from the risk.
<p><b>Comments and Demonstration of Compliance:</b></p> <p>Heraeus has set-up an automated and ongoing screening of all business partners for identifying risks in the supply chain. In addition, and based on the risk assessment a regular re-assessment of all business partners and transactions is established. In addition, the compliance officer will carefully assess any ad-hoc identified risk brought up by any stakeholder and will decide on necessary actions.</p> <p>For technical reasons we had to move our KYC screening software to a new platform. During that transformation in late 2019 we discovered a few shortcomings in the old as well as in the new platform. Due to rigorous testing we were able to quickly address these issues.</p> <p>Based on our risk management we had to reject again a notable number of potential partners and to stop dealing with existing ones, especially in the case of our Gold, Silver, Platinum and Palladium supply chain.</p>
<b>2. Where a management strategy of risk mitigation is undertaken, it should include measurable steps to be taken and achieved, monitoring of performance, periodic reassessment of risk, and regular reporting to designated senior management.</b>
<p><b>Comments and Demonstration of Compliance:</b></p> <p>Corresponding procedures are in place and are applied accordingly. In case our risk assessment identifies medium or high risks, we actively approach our suppliers to receive further information like proof of origin. If we cannot mitigate our risk assessment to at least medium risk level, we will terminate our supply agreement.</p>
<b>Step 4: Arrange for an independent third-party audit of the supply chain due diligence</b>
<p><b>Compliance Statement with Requirement:</b></p> <p>We have fully complied with Step 4: Arrange for an independent third-party audit of the supply chain due diligence.</p>
<p><b>Comments and Demonstration of Compliance:</b></p> <p>For the reporting period 2019 and the fact that the LPPM started its "Responsible Platinum/Palladium Guidance", we did engage PwC as our assurance provider again for the "reasonable assurance" audit not only for Gold and Silver, but also for Palladium and Platinum to stay with all 4 metals in sync for future LBMA and LPPM audits. Our reports can be viewed in the download section here: <a href="http://www.heraeus.com/conflictminerals">www.heraeus.com/conflictminerals</a></p>

# Heraeus LPPM Compliance Report 2019 for HDE

## Step 5: Report on supply chain due diligence

### Compliance Statement with Requirement:

We have fully complied with Step 5: Report on supply chain due diligence.

### Comments

Further information and details of how Heraeus' systems, procedures, processes and controls have been implemented to align to the specific requirements in the LPPM "Responsible Platinum/Palladium Guidance" V1 June 2018 as well as the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas" – Third edition November 2016 has been set out in our updated supply chain policy which is available on our company website's download sections: [www.herae.us/conflictminerals](http://www.herae.us/conflictminerals)

## Heraeus overall conclusion

**Table 3: Management conclusion**

Is the refiner in compliance with the requirements of the LPPM Responsible Platinum/Palladium Guidance and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas for the reporting period?	
YES	<p>In conclusion, Heraeus implemented effective management systems, procedures, processes and practices to conform to the requirements of the LPPM "Responsible Platinum/Palladium Guidance" V1, June 2018- as explained above in Table 2, for the reporting year ending 31<sup>st</sup> of December 2019.</p> <p>Within the reporting period, we had to re-program our KYC software tool in order to move it onto another IT platform. During extensive testing we encountered that the reminder function for re-rating existing customers behaved erratically and some customers were re-rated later than planned. However new customer KYC checks and their rating was not affected.</p> <p>These findings identified during the audit have been timely addressed through corrective action plans and have been reviewed and approved by the auditors.</p> <p>Heraeus is committed to continuous improvement and that is monitored internally on a regular basis. Any corrective actions identified will be implemented shortly.</p>

## Other details

**Table 4: Other report comments**

If readers of this report wish to provide any feedback to Heraeus please contact the HDE compliance officer at: [juergen.mueller@heraeus.com](mailto:juergen.mueller@heraeus.com).

**Heraeus**

Heraeus Deutschland GmbH & Co. KG  
Global Business Unit  
Heraeus Precious Metals  
Heraeusstr. 12-14  
63450 Hanau, Germany

Hanau, October 28. 2020

i.V. Dr. Juergen Mueller-Schaefer

### Note:

Annex on Page 6 through 7 is listing the countries of origin of Palladium and Platinum (both mined and recycled), and amount received from each country, for the assessment period as requested by the LPPM Responsible Platinum/Palladium Guidance, June 2018.

This information is only communicated to LPPM and will not be disclosed to the public.