

# AUDIT SUMMARY REPORT

## THIRD – PARTY AUDIT

according REGULATION (EU) 2017/821 OF THE EUROPEAN  
PARLIAMENT AND OF THE COUNCIL of 17 May 2017

laying down supply chain due diligence obligations for Union importers of tin,  
tantalum and tungsten, their ores, and gold originating from conflict-affected  
and high-risk areas

according Article 6.1.

**Audited company:**

**SENJU METAL EUROPE GMBH**

Kirchnerstrasse 6-8,  
Frankfurt am Main, 60311,  
GERMANY

Audit date: 23.3.2023

## **1. Audit information:**

**1.1. Audit Objectives (6.1.b):** The determination of conformity of the SENJU METAL EUROPE GMBH 's supply chain due diligence practices with Articles 4, 5 and 7 according REGULATION (EU) 2017/821.

Further step is the determination of conformity of the SENJU METAL EUROPE GMBH management system with ISO 9001:2015 connected with supply chain due diligence practices with Articles 4, 5 and 7 according REGULATION (EU) 2017/821.

**1.2. Audit scope according REGULATION (EU) 2017/821 (6.1.a):** all of SENJU METAL EUROPE GMBH activities, processes and systems used to implement supply chain due diligence regarding minerals or metals, including SENJU METAL EUROPE GMBH management system, risk management, and disclosure of information in accordance with Articles 4, 5 and 7 respectively.

Audit scope according ISO 9001:2015: Selling and marketing of solder-materials.

Remark: In the company is no manufacturing shift, in company is administration office working hours 8:30-17:00.

**1.3. Audited company:** SENJU METAL EUROPE GMBH, Kirchnerstrasse 6-8, Frankfurt am Main, 60311, GERMANY.

**1.4. Auditor:** Mrs. Jana Rumanová, NAJARU Services s.r.o.

Me, auditor Jana Rumanova confirm independence and free of conflicts of interest and I confirm, that the audit I provided it with audit principles with integrity, fairness, professionalism, confidentiality, independence, evidence-based approach, risk -based approach, competence and accountability. I confirm that all information connected with this audit are confidential.

The auditor Jana Rumanova is a qualified, independent third-party auditor, free of conflicts of interest, having demonstrated relevant experience. Details of competence are in the final report.

**1.5. Audit type:** 3th party audit, Statutory/Regulatory

**1.6. Audit date:** 23.3.2023

**1.7. Audit done:** remotely

**1.8. Standard for auditing:** ISO 19011:2018

**1.9. Audit language:** English, German

**1.10. Audit criteria:** Requirements of REGULATION (EU) 2017/821 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 17 May 2017 laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas, Articles 4, 5 and 7 (hereinafter “Regulation (EU) 2017/821”), OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Third Edition, ISO 9001:2015.

**1.11. Legislative:** Requirements of REGULATION (EU) 2017/821 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 17 May 2017 laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and

high-risk areas, Articles 4, 5 and 7 and the related OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Third Edition

**1.12. Standard:** ISO 9001:2015

**1.13. Assessment Period:** years 2021, 2022, partially year 2023 to the day 1.2.2023

**1.14. Audit principles:** Audit was provided according audit principles as are defined in ISO 19011:2018, according integrity, fairness, professionalism, confidentiality, independence, evidence-based approach, risk-based approach and further competence and accountability.

## **2.1. General information**

The audit is process-oriented and focused on risks. The audit was based on sampling therefore not all findings found in the system may have been identified. Further the audit was targeted towards reliable evidence. During audit were using interviews, observation of processes and activities, review of documentation and records.

## **3. Audit Conclusion:**

The audit was conducted in accordance with standard for auditing ISO 19011:2018 to focus the determination of conformity of the SENJU METAL EUROPE GMBH 's supply chain due diligence practices with Articles 4, 5 and 7 according "REGULATION (EU) 2017/821 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 17 May 2017 laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas" 7 (hereinafter "Regulation (EU) 2017/821").

Further step was the determination of conformity of the SENJU METAL EUROPE GMBH management system with ISO 9001:2015 connected with supply chain due diligence practices with Articles 4, 5 and 7 according REGULATION (EU) 2017/821.

The auditor verified the scope, selected samples, and gathered objective evidence through documentation review, interviews, and visual observations.

Audit was provided according audit plan. There were no limitations to this audit.

In ANNEX III see Evaluation and Information about Requirements acc. REGULATION (EU) 2017/821.

### **Overall evaluation:**

The auditor found that the auditee's due diligence system does not fully comply with the requirements of the of "Regulation (EU) 2017/821", Articles 4, 5 and 7 and OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Third Edition" and ISO 9001:2015, therefore to the identified 7 minor nonconformities are required actions a to solve it and close it to reach fully comply with mentioned requirements. See Annex 1 see NONCONFORMITY REPORT with 7 minor nonconformities. Actions to the nonconformities need to be closed to due day mentioned in ANNEX 1 in NONCONFORMITY REPORT. Recommendations to the union importer on how to improve its supply chain due diligence practices are provided in ANNEX 2.