



Refiner's Silver Compliance Report 2024

The LBMA has developed the Responsible Sourcing Programme and the Responsible Silver Guidance (RSG V2 2023) for Good Delivery Refiners such as Doduco Contacts and Refining GmbH. The RSG requires Good Delivery Refiners to adopt high standards of due diligence to help identify and prevent money laundering, systematic or widespread abuses of human rights, terrorist financing and contribution of conflicts in the refiner's supply chain.

This report demonstrates how Doduco Contacts and Refining GmbH complies with the requirements of the LBMA Responsible Silver Guidance.

Refiner's details

Refiner's name	Doduco Contacts and Refining GmbH
Location	Im Altgefäll 12, 75181 Pforzheim, Germany
Reporting year	01.01.2024 – 31.12.2024
Senior Management responsible for this report	Dr. Timo Mützel Managing Director

Doduco Contacts and Refining GmbH (in the following referred to as "Doduco") is one of the global leaders in electrical contacts. Our business segments include contact materials, semi-finished products, contact parts as well as precious metal recycling and silver powders. The customers mainly operating in the electrical, electronic and automotive industry.

The company was established in 1922.

Step 1: Establish strong company management systems

Declaration of compliance with Guidance:

We have fully complied with step 1: Establish a strong management system.

1. Adopt a company policy regarding due diligence for supply chains of silver.

Declaration of compliance with Guidance:

Doduco has adopted a policy regarding due diligence for supply chains of precious metals.

Comments and Demonstration of Compliance:

We follow a silver supply chain policy which is consistent with the model set out in Annex II of the OECD Due Diligence Guidance. The policy is our commitment to implement all relevant regulatory, ethical,

environmental, social and governance requirements defined in the German Money Laundering Law, the OECD Guideline as well as the LBMA Responsible Silver Guidelines.

The policy is annually reviewed and the current version from June 2024 is signed by Senior Management.

The Supply Chain Due Diligence Policy is published (in German and English) on the company homepage at <https://saxonia-holding.de/compliance/> communicated to all relevant business partners and employees.

2. Set up an internal management structure to support supply chain due diligence.

Declaration of compliance with Guidance:

Doduco has set up an internal management structure to support supply chain due diligence.

Comments and Demonstration of Compliance:

An internal management system was developed and implemented to meet the requirements to support supply chain due diligence at Doduco. The management system includes guidelines, processes and standardised forms for risk identification, client acceptance, monitoring of suppliers and checking of incoming materials.

Customer management and transactional risk management is under responsibility of the Doduco local team. The group compliance team performs the risk assessment process based on customer documents and internal and external risk assessment tools. For the approval of customers the local management and group level management are required based on the risk level of the customers.

The Group Compliance Officer supervises the supply chain due diligence and KYC process within the SAXONIA group and reports directly to the group level managing director of SAXONIA Holding GmbH. The Group Compliance Officer with previous experience from management system administration and KYC assessment holds the position since December 2023.

Training:

The Group Compliance Officer provides trainings regarding KYC, responsible sourcing of precious metals and whistleblowing every two years to staff members who are involved in supply chain matters. The Group Compliance Officer has developed a training program to track the trainings and identified job positions involved directly with the supply chain and where risks could be identified reasonably.

27 employees in all relevant positions (e.g. material acceptance area, sales, metal management) received specific training related to their tasks.

Payments are exclusively conducted via official banking channels.

Doduco does not consent to cash transactions.

Doduco fully and transparently cooperates with government authorities. In 2024 no anti-money laundering (AML) relevant transactions had to be reported.

All customer documents are retained in compliance to relevant laws for at least 5 years following the end of the reporting year.

Quarterly internal compliance audits monitor deviations and violations of the internal due diligence process. No material violations were reported.

3. Established a strong internal system of due diligence, controls and transparency over silver supply chains, including traceability and identification of other supply chain actors.

Declaration of compliance with Guidance:

Doduco has established a strong internal system of due diligence, controls and transparency over precious metal supply chain, including traceability and identification of other supply chain actors.

Comments and Demonstration of Compliance:

Supply chain traceability and documentation:

Doduco has a precious metal acceptance process. Materials bearing precious metals delivered for refining, can only be accepted if a completed form is provided. The form is filled in by the supplier. It requires the supplier to include the supplier's name, weight of material delivered, the type of material, the (expected) material composition and the material's origin. The information provided is reviewed for consistency. In the following a unique reference number is given to the specific lot and the information is entered in the ERP system. Finally, the supplier receives a confirmation of receipt showing the unique reference number for the specific lot. This number is used for any further communication regarding the lot.

In addition to the material questionnaire for each delivery, for scrap material according to the Waste Ordinance that is imported into Germany documentation as specified in Annex VII of the European Waste Directive must be provide by the customer.

Material traceability at Doduco can be tracked up to the point where the material becomes homogenized.

4. Strengthen company engagement with silver supplying counterparties and, where possible, assist silver supplying counterparties in building due diligence capabilities.

Declaration of compliance with Guidance:

Doduco has strengthened company engagement with silver supplying counterparties, and where possible, assisted supplying counterparties in building due diligence capabilities.

Comments and Demonstration of Compliance:

To strengthen company engagement with precious metal supplying counterparties, Doduco requests all suppliers in writing to commit the understanding and adhering to the SAXONIA Group Supply Chain Policy with each delivery. All new suppliers are provided with SAXONIA Group Supply Chain Policy together with the KYC forms prior to the beginning of the business relationship. New customers confirm the acceptance and adherence to the Supply Chain Policy by signing the KYC forms legally binding. For delivery of material customers must fill in a form and confirm the acceptance and adherence of the Supply Chain Policy for this delivery by signing it. The form is available on SAXONIA homepage.

5. Establish a confidential grievance mechanism

Declaration of compliance with Guidance:

SAXONIA group has established a whistleblowing contact desk available for any employee or external stakeholder accompanied with a policy providing confidential treatment and adequate protective measures.

Comments and Demonstration of Compliance:

SAXONIA Group Supply Chain Policy names a functional email address (compliance@saxonia.de) and the phone number of the Group Compliance Officer for internal and external stakeholders to get in contact for any reason related to supply chain due diligence. We also highlighted the Whistleblowing Hotline with a separate document at our website <https://saxonia-holding.de/compliance/> to encourage all stakeholders to support us in endeavours by disclosing any relevant information. During the annual trainings, employees are encouraged and trained to participate in risk identification and management systems as well as communicating potential or actual risks internally to the Group Compliance Officer.

In 2024 no grievances were received.

Step 2: Identify and assess supply chain risks

Declaration of compliance with Guidance:

We have fully complied with step 2: Identify and assess supply chain risks.

1. Conduct due diligence to identify potential risks in the silver supply chain

Declaration of compliance with Guidance:

Doduco has a process to identify risks in the supply chain.

Comments and Demonstration of Compliance:

Recycled precious metals material and precious metal by-products from mining operations based in Europe are our key business. Doduco identifies risks in the supply chain during client on-boarding and during the monitoring of suppliers and material.

1. Doduco identifies and assesses precious metals supplier's risk during the collection of KYC information and client onboarding process. The criteria applied within the scope of the country risk assessment are based on the risks defined in the RSG Step 2 Section 1. The minimum information required for completing supplier due diligence is defined in the RSG Step 2 Section 2. as well as the German Money Laundering Law. During the client onboarding process, precious metal suppliers are subject to a risk assessment and rated according to their risk profile (high, medium, low).
2. Doduco monitors incoming transactions as well as the precious metals suppliers. Doduco uses a specific form as explained in Step 1.3. for the delivery of material containing precious metals. Red flags resulting in re-assessments of the supplier's risk profile may be identified by, for example:
 - material delivered does not correspond to supplier's business,
 - information collected from supplier visits or
 - due to information retrieved from compliance tool (external database monitoring suppliers and informing Doduco about changes).

Doduco is monitoring transactions by applying a risk-based approach. Considering this, the following information is obtained and documented for each lot of recycled silver received:

- estimated weight (from counterparty),
- shipping/ transportation documents (waybill/ airway bill, pro-forma invoice, if applicable),
- export and import form for high-risk transaction, if applicable.

In this context Doduco verifies that the documents and materials are consistent with each other and with its knowledge of the supply chain based on the due diligence performed. Same applies to the verification that the shipment received is in conformance with the shipping/ transportation documents. For any transactions which are not consistent or are in any way suspicious the background is examined and findings are reported in writing to the Group Compliance Officer.

In this case the silver is physically segregated and secured until the inconsistencies are resolved. If applicable the findings are reported to the appropriate authorities.

Doduco only accept lots of recycled silver and from very limited sources silver as by-product from European lead refining industry.

2. Classify supply chains based on risk profiles.

Declaration of compliance with Guidance:

Doduco has classified the supply chain based on risk profiles.

Comments and Demonstration of Compliance:

Before entering the business relationship with Doduco new suppliers are risk evaluated and classified based on the evaluated risk. Criterias to identify high-risk suppliers are established.

The onboarding process focuses on collecting KYC information and considering the associated risks. SAXONIA group KYC process consists of obtaining and verifying information on:

- the nature of supplier's business,
- the identification of the beneficial owner,
- information on the purpose and intention of the business relationship,
- financial details and
- the material's country of origin and transit countries.

SAXONIA group has a dedicated client onboarding function (COF) at SAXONIA Holding GmbH. COF is responsible for obtaining and verifying KYC information given by suppliers and providing an initial risk rating. All new suppliers' KYC dossiers are completed prior to the beginning of the business relationship. For existing suppliers, a risk-based approach based on country of incorporation has been developed to complete the KYC dossiers.

In 2024 no recycled silver has been sourced from high-risk country of origin.

Doduco did in 2024 business with 2 customers, based in Germany and Sweden, that have been classified as high risk. The PEP status and the material supply chain, where the silver originates as by-product from lead refining industry triggered the high risk category.

3. Undertake Enhanced Due Diligence (EDD) measures for high-risk supply chains

Declaration of compliance with Guidance:

Identified high-risk supply chains need approval from the Senior Management, which also decides and approves appropriate EDD measures.

Comments and Demonstration of Compliance:

Senior Management has ultimate control and responsibility for the precious metal supply chain. The Managing Director, COF and the Key-account Manager approve new precious metal suppliers. High-risk precious metal suppliers require appropriate EDD and additional approval of SAXONIA Group Managing Director. High risk customers are reviewed and approved by the Managing Director on entity and group level as well as the Group Compliance Officer on a yearly basis.

Based on the assessed risk exposure Doduco did on-site visits and online meetings as EDD measures with its 2 high risk customers in 2024 in addition to the annual review and approval process. The visit and meetings were performed by responsible sales managers which undergo regular due diligence process training. As a result of the EDD Doduco gained sufficient confirmation from its suppliers that the supply chain ESG risks are well managed by appropriate due diligence processes.

Step 3: Design and implement a management strategy to respond to identified risks

Declaration of compliance with Guidance:

We have fully complied with Step 3: Design and implement a management system to respond to identified risks.

1. Devise a risk management strategy for the identified risk

Declaration of compliance with Guidance:

Doduco operates a risk management system that ensures measures adapted to the risk.

Comments and Demonstration of Compliance:

Doduco recognizes that supply chain risk may be identified by various departments, including compliance, material acceptance area, sales or metal management. Therefore, trainings have been provided to support risk identification and communication. Internal procedures require employees who identify a risk to report directly to the Group Compliance Officer and Senior Management. Senior Management supported by the Group Compliance Officer decides on a case-by-case basis whether adequate measures are effective for the continuation of the relationship in an environment with high-risk potential or whether the relationship needs to be suspended or terminated.

2. Monitor the improvement plan

Declaration of compliance with Guidance:

Doduco maintains a strategy of risk mitigation, monitoring of performance, periodic reassessment of risk and reporting to Senior Management.

Comments and Demonstration of Compliance:

Depending on the risk mitigation strategy implemented and the risk identified, specific measures are defined by Senior Management and the Group Compliance Officer. The compliance department monitors the effectiveness of the measures taken and reports the status and effectiveness to the Group Compliance Officer and Senior Management.

In 2024 Doduco had no counterparties that required risk mitigation measures. No improvement measures from previous years were pending.

3. Report findings to the Senior Management

Declaration of compliance with Guidance:

Doduco reports findings to designated Senior Management.

Comments and Demonstration of Compliance:

Risk assessment and risk relevant documentation of all contributors to the SAXONIA silver supply chain is centralised in the SAXONIA Holding and under direct control of the SAXONIA Holding Senior Management.

4. Continuously monitor adequacy of risk management strategies

Declaration of compliance with Guidance:

The risk management strategies of Doduco as part of the SAXONIA group are continuously monitored for adequacy.

Comments and Demonstration of Compliance:

SAXONIA group reviews and, if needed, adjusts at least annually all essential elements of the risk management system.

Step 4: Arrange for an independent third-party audit of the supply chain due diligence.
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Declaration of compliance with Guidance:

We have fully complied with Step 4: Arrange for an independent third-party audit of the supply chain due diligence.

Comments and Demonstration of Compliance:

Doduco engaged the service of LBMA approved assurance provider KPMG Cert GmbH Umweltgutachterorganisation to perform an audit covering Silver for 2024.

The on-site audit took place in February 2025. The next on-site audit is scheduled for February 2026.

Step 5: Report on supply chain due diligence

Declaration of compliance with Guidance:

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

Comments and Demonstration of Compliance:

The Supply Chain Due Diligence Policy is available on our company website. The Doduco Refiner's Silver Compliance Report for reporting year 2024 is available on our company website (<https://doduco-contacts.de/>) as well as on the LBMA Good Delivery List for Silver Refiners. (<http://www.lbma.org.uk/good-delivery-list-refiners-silver-current>)

Management conclusion

Doduco has implemented effective management systems, procedures, processes and practices to comply with the requirements of the LBMA Responsible Silver Guidance, as explained in Step 1, for the reporting year ended 31 December 2024.

Doduco is committed to continuous improvement, and any corrective actions identified will be monitored internally on a regular basis.

If users of this report like to provide any feedback to SAXONIA group with respect to this report, they may contact group compliance at compliance@saxonia.de.

Pforzheim, 07.03.2025



Dr. Timo Mützel
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Doduco Contacts and Refining GmbH



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