

# Annual report 2024

of thyssenkrupp Rasselstein GmbH

Activities to implement the due diligence obligations for the import of tin according to Regulation (EU) 2017/821





## About thyssenkrupp Rasselstein GmbH

thyssenkrupp Rasselstein GmbH is one of the leading suppliers of high-quality packaging steel in the world. At the site in Andernach, Germany – the largest production facility of its kind in the world – up to 1.5 million tons of tinned or special chromium-coated packaging steel are produced annually and distributed in the form of coils or sheets.

About 2,400 employees serve around 400 customers in 80 countries in a variety of markets – from manufacturers of food and pet food cans to manufacturers of aerosol cans, containers for chemical products, as well as for crown corks and twist-off closures.

Expert teams in service, sales and technical customer service complete the product portfolio.



# 1. Obligations under the EU regulation for conflict minerals

On January 1, 2021, obligations from Regulation (EU) 2017/821 which regulates the trade of four minerals – tin, tantalum, tungsten and gold – came into force in the European Union. With the regulation, the EU wants to prevent that the trade of these minerals supports armed conflicts and forced labor. Since then, companies importing these raw materials into the EU have been subject to extensive due diligence and inspection obligations along the supply chain.

As one of Germany's biggest tin importers, tinplate manufacturer thyssenkrupp Rasselstein GmbH welcomes the regulation coming into force, because already in 2010, the company implemented the specified obligations into its procurement policy. In addition, the management systems of the medium-sized company structure were adjusted accordingly in the last years.

# 2. Obligations arising from the Supply Chain Due Diligence Act (LkSG)

On 1 January 2023, the „Act on Corporate Due Diligence to Prevent Human Rights Violations in Supply Chains“ (in short: LkSG) came into force in Germany. thyssenkrupp Rasselstein GmbH became subject to reporting within the LkSG requirements as of 1 January 2024. The company submitted a report for 2024 to the Federal Office of Economics and Export Control (BAFA) in accordance with the official requirements and published it while protecting its trade and business secrets. The report can be viewed on the website at <https://www.thyssenkrupp-steel.com/en/rasselstein/report-on-lksg/>

# 3. Risk assessment in the supply chain

Tin is needed to protect tinplate from corrosion and is therefore a necessary raw material to ensure high quality products such as the food can. The tin coating on tinplate is extremely thin: usually only between 1.0 g/m<sup>2</sup> to 11.2 g/m<sup>2</sup>. However, to make sure that these requirements do not come at the expense of people and the environment, thyssenkrupp Rasselstein GmbH ensures the sustainability of its supply chain – and not just since today. The Andernach-based company has not sourced tin from conflict regions in more than a decade. Human rights, fair working conditions, environmental protection and the fight against corruption – these values are not only important within the group of enterprises, they also apply to the supply chain. thyssenkrupp is therefore committed to the United Nations Global Compact by means of its Supplier Code of Conduct.

Already years ago, thyssenkrupp Rasselstein GmbH established procedures in the company to review tin supply chains and identify risks. The company's supply chains are transparent and are subject to regular audits. They also comply with the regulations of the United States of America, commonly called the Dodd-Frank Act<sup>1</sup>, even though the company is not subject to SEC oversight and therefore has no legal obligation to comply with these requirements on conflict minerals.

In countries such as the Democratic Republic of the Congo (DRC) and neighboring states, the extraction of certain raw materials sometimes contributes to significant human rights violations as well as the financing of violent conflicts in this region.

thyssenkrupp Rasselstein GmbH therefore does not source raw materials that directly or indirectly finance or benefit armed groups and is in close contact with its suppliers at all times in order to increase the transparency of the products supplied by them. The aim is to further expand cooperation with customers, suppliers and other stakeholders to ensure even better approaches and more practical solutions. thyssenkrupp Rasselstein GmbH regularly conducts checks to ensure compliance with the regulations. This is achieved in particular through on-site audits, which are carried out with the support of professional auditing companies. To this end, thyssenkrupp Rasselstein commissions qualified auditors to assess the situation at each production site. An on-site audit was successfully carried out in Thailand in 2024. An audit in South America is planned for 2025.

thyssenkrupp Rasselstein sources its tin from long-standing partners in Peru, Bolivia, Brazil and Thailand. From the outset, thyssenkrupp Rasselstein has taken a holistic approach to its cooperation with suppliers: The mining and processing of tin is not only in accordance with human rights, but also complies with the highest labor and environmental standards. In the past, the company, as a responsible tinplate manufacturer, therefore repeatedly removed suppliers from its sources that did not meet the requirements. These requirements include not only the method of procurement, but also the quality of the raw material itself: At 99.95 percent, the tin required by thyssenkrupp Rasselstein has a particularly high degree of purity.

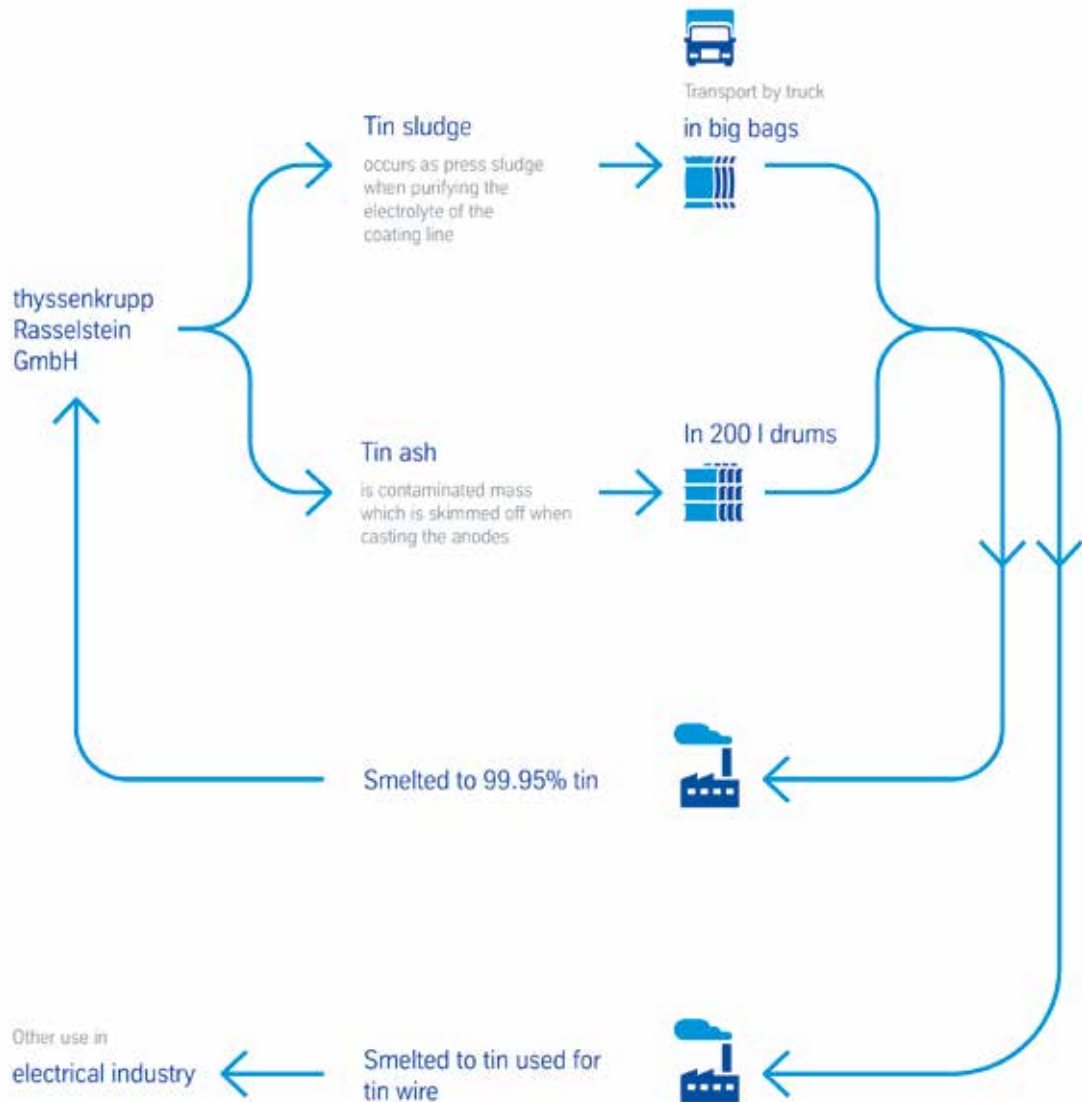
<sup>1</sup> Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502

# Source countries for tin

(worldwide)



## 4. Strengthening the recycling process by sourcing secondary tin



Tin can also be recovered from the valuable sludge or slag materials which are generated during the smelting process. At European secondary smelters, the waste materials are processed to recover pure tin. Nowadays, the tin recovered in recycling processes is in no way inferior in quality to directly mined tin and meets the highest requirements of the demanding specifications of thysenkrupp Rasselstein's tinplate grades. In order

to further expand these cycles, corresponding supply contracts have been concluded with partners in Poland and Belgium. In this way thysenkrupp Rasselstein recovers pure tin from waste materials, which can then be cast into new anodes in its own anode foundry. The goal is to further expand these supply streams in order to promote the aspect of resource conservation in the long term.

# 5. Supply flows

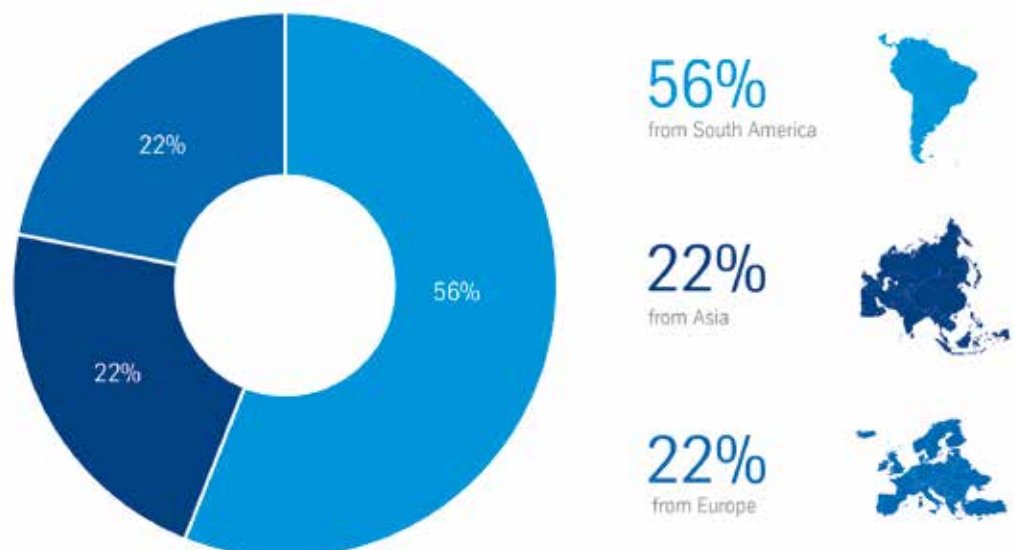
In 2024, thyssenkrupp Rasselstein GmbH's supply flows continued to be managed by proven suppliers to transparent risk assessment. All of the company's non-European tin suppliers have been audited in recent years. The audits were aimed at verifying compliance with the globally applicable social standards as defined by UN Global Compact. The results of the audits were incorporated into a risk matrix to present the obligations arising from the Supply Chain Duty of Care Act. For this purpose, thyssenkrupp AG has set up a corresponding organisation at segment level. A Maple Croft tool was used to analyse the results of the assessment.

In 2024, supply flows were negatively impacted by the Gaza conflict on the one hand (the Suez Canal could not be navigated) and the water situation in the Panama Canal on the other (insufficient supply). As a result, thyssenkrupp Rasselstein could only meet its demand for tin for the production of tinplate by maintaining sufficient stocks. As in previous reporting

periods, thyssenkrupp Rasselstein intentionally diversified its tin procurement globally in 2024. This strategy aimed at ensuring a seamless year-round supply of aggregates in order to minimise supplier risks. The approach with partners on most continents proved to be effective.

The tin sourced by the company came 56 percent from South America, 22 percent from Asia, and 22 percent from Europe. The deliveries from South America and Asia were fresh, refined tin, and the deliveries from Europe originated from secondary smelters. In these smelters, tin residues were reprocessed and placed on the market as new goods. In line with the sustainability strategy of thyssenkrupp Rasselstein, the route through secondary smelters was further expanded as it is the company's explicit goal to significantly reduce CO<sub>2</sub> emissions in the supply chain in the long term. This also includes the option of procuring tin from secondary refineries in Europe instead of having material delivered from South

## Percentage of pure tin purchased



## 6. Implementation of the Conflict Minerals Regulation and third-party auditing

In 2024, two follow-up audits were conducted by DEKRA at thyssenkrupp Rasselstein GmbH to ensure the sustainable implementation of the improvements.

This allowed thyssenkrupp Rasselstein to incorporate further positive elements into its management system. The goal is to continue maintaining a forward-looking system to prevent risks in the supply of conflict

minerals, specifically tin, for customers and the public. The Conflict Minerals Regulation has now been fully integrated into the QM system of thyssenkrupp Rasselstein GmbH. As mentioned, thyssenkrupp Rasselstein will also conduct third-party combination audits (conflict minerals and CSR) at selected non-European suppliers in 2025.





# 7. Complaints

America or Asia.

If you have any questions about the procurement process for tin, please contact the thyssenkrupp Rasselstein GmbH employees named at the end of this report. Complaints may be directed to:

thyssenkrupp AG  
CO/L&C-INV  
thyssenkrupp Allee 1  
D- 45143 Essen

Phone: +49 201 844 505050  
whistleblowing@thyssenkrupp.com

The complaints received here are only visible to the Compliance Officer. In his function, the Compliance Officer can decide on further steps or procedures in connection with the complaint received.

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