

Conflict Minerals Report 2025



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Introduction

The raw materials tin, tantalum, tungsten, and gold (also known as 3TG) are referred to as conflict minerals. In politically unstable areas, the trade with conflict minerals can finance armed groups, promote forced labor, and other human rights abuses, as well as support corruption and money laundering.

Envases Europe Group uses the raw material tinplate, which is steel coated with a layer of tin through an electrolytic tin plating process. Due to the use of tin in our raw material, we conduct a yearly due diligence process to ensure that the tin used in our products doesn't support violence, human rights abuses, and financial crime.

Scope

This report covers the calendar year 2025 and is based on the information provided by our tinplate suppliers. We rely on our suppliers for the accuracy of the information they provide about the smelters or refiners they use.

Our approach

This report details our conflict minerals due diligence process and affirms our compliance with the EU Conflict Minerals Regulation 2017/821 and the US Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010.

At Envases, we use the Conflict Minerals Reporting Template (CMRT), a reporting template developed by the Responsible Minerals Initiative (RMI), to ensure documentation, transparency and traceability in our tinplate supply chain. We maintain an ongoing due diligence process and diligently monitor and verify our tinplate suppliers' sourcing practices.

We work continuously with the aim to ensure that tin is sourced verifiably, and does not contribute to conflicts or other related illegal activities.

Conflict minerals due diligence status for 2025

In 2025, 100% of our tinplate suppliers filled the CMRT 6.5. Based on the answers, we encountered risk indicators regarding two smelters—one in China and one in Thailand—which we investigated together with the relevant tinplate suppliers. Both smelters are currently in an RMI re-assessment process; however, they remain listed as conformant on the RMI smelter list.

The red flags encountered in Envases' supplier due diligence process show that the system is working properly, which is a positive outcome. We take our responsibility seriously and will not accept any support, financial or otherwise, for armed conflicts.

Due diligence process

We follow the 5-step due diligence framework outlined in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Step 1: Establish strong company management systems

Envases will not source tin that relates to any conflicts or other related illegal activities as stated in our Code of Conduct and Supplier Code of Conduct.

Therefore, all tinplate suppliers must be able to show transparency, and take accountability of the raw materials they deliver to us. We expect they make all necessary declarations upon request, including disclosing the smelter base in accordance with the CMRT. All tin suppliers are required to sign our Supplier Code of Conduct or provide their own Code of Conduct which has to meet our standards.

When our general standards are not met, we strive to engage in supplier dialogue to build capacity and support our suppliers' improvements in their due diligence performance.

The due diligence on conflict minerals at Envases is managed in a collaboration between the Procurement and Sustainability departments. Based on our supplier data, a consolidated Envases CMRT document is updated annually and provided to customers upon request. All related records are maintained for a minimum of five years in a computerized database.

The Envases [Whistleblower System](#) is available to all internal and external stakeholders to raise concerns regarding conflict minerals or supply chain risks.

Step 2: Identify and assess risks in the supply chain

All tinplate suppliers are required to share their CMRT on an annual basis, by which we assess the risks in our supply chain based on CAHRA countries, the RMI conformant list, and information from open data sources.

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

When we encounter red flags or cases that need further investigation, the Head of Procurement and Head of Sustainability are informed and consulted. Afterwards, we engage in dialogue with our tinplate suppliers and, if relevant, ask for further documentation. We believe that supporting our suppliers in capacity building is the best strategy for making improvements and mitigating risks.

Therefore, we have established an escalation process based on the severity of the red flag and willingness to collaborate.

- In the first step, we continue to trade with the tin supplier while investigating and mitigating the red flag.
- In the second step, we temporarily suspend the trading with the tin supplier while mitigating and improving the red flag.
- In the third step, we will discontinue engagement with the tinplate supplier if they are unable or unwilling to remediate the red flag.

Escalation actions are decided by the Head of Procurement based on regular updates on the progress of the mitigation.

To keep the process dynamic and ensure the red flag doesn't recur, we repeat the risk assessment in step 2.

Step 4: Carry out independent third-party audit of supply chain due diligence at identified points in the supply chain

Envases relies on the list of conformant smelters and refiners published by the RMI under their flagship program Responsible Minerals Assurance Process (RMAP). The RMAP uses an independent third-party assessment of smelter/refiner management systems and sourcing practices to validate conformance with RMI Standards.

If necessary, we will conduct a third-party audit that is planned according to the specific situation.

Step 5: Report on supply chain due diligence

An annual conflict minerals due diligence report is published at our website.

Reporting concerns

We encourage all stakeholders to use the Envases [Whistleblower System](#) to report concerns regarding conflict minerals, including suspected issues related to the extraction, trade, or handling of minerals from high-risk areas within our supply chain.