

Public disclosure under Article 7(4) of Regulation (EU) 2017/821

Recycled and scrap gold — reporting period 2025

Argor-Heraeus Deutschland GmbH

Conclusion

For the period 1 January to 31 December 2025, Argor-Heraeus Deutschland GmbH reasonably concludes that all gold it imported within the scope of its 2025 review was derived only from recycled or scrap sources, as defined in Article 2(s) of Regulation (EU) 2017/821. The gold was recovered or recycled in Europe and purchased from Europe-based suppliers. The company did not import newly mined gold during this period.

This conclusion relates to the company's gold imports for the stated reporting period. It is based on the supporting supply-chain information described below and is not based solely on the location of a supplier.

Measures used to reach the conclusion

The company assessed the recycled or scrap status of the imported gold by reviewing and cross-checking available supply-chain records, including:

- Supplier declarations identifying the material as recycled or scrap gold.
- Lot-level purchase, import and chain-of-custody or traceability records linking the imported gold to the relevant suppliers and recycling or refining pathway.
- Records or confirmations from recyclers and refiners supporting the recycled or scrap origin and the recovery or recycling process in Europe.
- Available audit reports and certifications relevant to the suppliers, recyclers or refiners, used as corroborating evidence.
- Argor-Heraeus Deutschland GmbH own due diligence.

The company considers these records together when reaching its conclusion. Supporting documentation is available for review by the competent authority, subject to applicable confidentiality requirements.

This disclosure is made pursuant to Article 7(4) of Regulation (EU) 2017/821. It applies to the reporting period stated above.