This slide deck summarises discussions with ResponsibleSteel members held on 28 and 29 September 2021. Two sessions were held each day, one in the European morning and one in the European evening.

Overall, more than 60 representatives from over 40 member organisations participated in the calls, mostly from steel production, followed by consultancy, standard-setting, mining, trading, research, certification, civil society and downstream.
Responsible sourcing draft requirements – Discussion session with members

28 September 2021
09:00-11:00 and repeated at 17:00-19:00 CET
Marnie Bammert, Technical and Assurance Director
Housekeeping

• Observe antitrust issues
• Webinar is recorded for internal purposes
• Slides will be posted on ResponsibleSteel website
• High-level summary of discussions will be shared with members
• Please unmute to ask questions or use the Q&A box on your screen
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Antitrust statement

ResponsibleSteel is committed to complying with all relevant antitrust and competition laws and regulations. Failure to abide by these laws and regulations can potentially have extremely serious consequences for ResponsibleSteel and its members, including heavy fines and, in some jurisdictions, imprisonment for individuals. ResponsibleSteel has therefore adopted an Antitrust Policy, compliance with which is a condition of ResponsibleSteel membership and participation. You are asked to have due regard for this Policy today and indeed in respect of all other ResponsibleSteel activities.
<table>
<thead>
<tr>
<th>Date</th>
<th>Agenda Items</th>
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</thead>
</table>
| 28 Sept| • Update on process and timeline  
• Bringing everybody up to speed on the responsible sourcing discussions to date  
• Transition period: What could it look like and what would be its implications? |
| 29 Sept| • Outcomes of discussions on the 28th  
• Post-transition requirements, claims and logos  
• Scrap “project” |
Aim and format of sessions

Aim
Get closer to consensus on responsible sourcing requirements

Consensus:
• Opinions heard and understood, solutions that respect these opinions
• Not everybody has to fully agree, not seeking unanimous support, but general agreement

Format
• RS to set the scene
• Members relaying their positions to other members and discuss them
• RS to feed in positions from members and stakeholders who are not present
• Polls on specific questions to confirm level of agreement
Process and timeline for steel product certification requirements

To June 2021
• Discussions with members and stakeholders to create draft versions
• 2 rounds of public stakeholder consultation on draft versions

July-Nov
• Member and stakeholder meetings to discuss and resolve remaining issues
• Preparation of final draft

Nov-Jan
• Member technical and legal review

Feb
• SACC / Board approval to go to vote
• Membership vote on input materials, GHG, claims and labelling requirements
• Board ratification of requirements
Aim: Increasingly source from responsibly operating suppliers and be able to prove it

- Draft was published for 2nd round of stakeholder consultation in May/June and discussed with members and stakeholders thereafter
- Leverage existing ESG programmes. Available for mined material, not for scrap
- Mining: ESG programmes recognised by ResponsibleSteel are Bettercoal, IRMA, TSM for now. Assessment results to be published in early October
- Scrap: Focus on management systems and risk reduction in supply chains
- Input Material Score: Simple formula for calculation. Minimum score to be achieved to be able to label all steel as ‘RS certified’
We seem to have consensus on the following

• Commitment: RS to define headline supplier code of conduct as part of commitment -> could be integrated with existing Site Certification Standard
• Knowing supply chains: Platform for collecting and (safely) sharing supplier information -> to come at later stage
• Reporting: High-level aggregated information that is not commercially sensitive

Remember: Consensus is not unanimous support, but general agreement

-> Members confirmed that these criteria have their general support, although their full support will depend on the details
Do you agree with the following?

Polling question: “The responsible sourcing requirements should leverage existing, RS-recognised ESG programmes for mining”

Points to consider:

• Suppliers are approached with the same asks
• Reduces burden on suppliers to respond to many similar enquiries
• Gives steel sector more influence on the mining sector
• Standards developed using sound processes and stakeholder input
• ESG issues covered in comprehensive and in-depth manner
• Robust audit protocols to verify assessment results, stakeholder input into governance and audits

-> Members very supportive of leveraging existing standards for mining (91%)
Do you agree with the following?

Polling question: “Once certified, it should be possible for steel sites to label all steel product as ‘ResponsibleSteel certified’, not just a certain share”

Points to consider

- % certified in = % certified out would be more honest and could utilise a widely-used chain of custody model (mass balance)
- But, mass balance also creates the impression that the % certified out is better than the non-certified % out. Is not the case since mass balance allows mixing
- GHG emissions are for the whole site and cannot be attributed to certain share of steel products. GHG also cover scopes 1, 2 and 3, we intend to link sourcing and GHG
- Communication and marketing presumably easier for steel companies if all product can be labelled

-> Members somewhat split (42% in favour of labelling all products, 31% only a share, 27% are not sure)
Issues: Lack of participating mines, lack of processing standards

• Not many mine sites participate in a recognised programme, let alone have demonstrated a decent ESG performance in a third-party audit under that programme

• For upstream processors, there are currently 2 ESG standards we could recognise (ASI (only for aluminium) and TSM (also applies to smelters and refiners, but focus is on mining) but uptake is still low. IRMA is developing a Minerals Processing Standard and the ResponsibleSteel Standard could be applicable too

• Sectors are at early stages of responsibility journey, need to build awareness and capacity on ESG issues

• ResponsibleSteel should not set requirements that are currently unattainable

• Risks that ResponsibleSteel certification will not lift off for a number of years
Transition period could be a potential solution

- Suppliers to use a recognised ESG standard to understand their gaps
- Would not be expected to meet a certain ESG performance level
- Would help get miners and upstream processors moving
- But, there might be serious ESG issues in supply chains
Concern: Scrap requirements unworkable

- Sheer number and nature of suppliers makes it almost impossible to determine “origin” of scrap
- European scrap suppliers: “We are overregulated and RS does not ask for anything new”. True? Or mostly quality, residuals and radioactivity?
- Awareness-raising and buy-in needed
- No comprehensive ESG standard yet for scrap suppliers

Thousands of individuals and very small businesses collecting scrap

Aggregators, small and large

Steel customers
Transition period could be a potential solution

- Identify and assess ESG risks related to countries in which scrap was aggregated and processed
- Help initiate and support a project with the scrap sector to create an ESG standard for scrap companies that RS can recognise (ISO Standard in development)
- Project should be led by the scrap industry to create a sense of ownership and should be completed well before the end of the transition period
- Would get scrap sector moving and help raise awareness and build capacity with them
What would a transition period mean for steel companies?

- There might be serious ESG issues in supply chains -> provisional certification for steel companies only, reflected in logo
- Very low key claims to not overpromise and be truthful -> e.g. Committed to working with supply chains to embed responsible practices
- Steel companies cannot sit back and watch their suppliers make progress

Be aware of ESG gaps of mined material suppliers
Be aware of ESG risks related to scrap supply countries and support project to create ESG standard
Implement action plan to achieve requirements that apply after transition (tomorrow’s discussion)
Transition period – concerns, questions, comments

Morning session:
• About half the participants (20) were in favour of exploring a transition period
• Transition period seems good way to get things moving, but must be simple to explain and must be valuable
• Another option would be to recognise additional standards, e.g. Coppermark, LME
• Do we really need a transition period? Could first focus on the key input materials - iron ore, coal, scrap. Next phase could consider other materials
• Why would a steel company want to seek “provisional” certification? Value not clear
• Other programmes have transitional / provisional certification too, seems to work
• If specific ESG performance required from suppliers during transition, then decouple GHG and sourcing?

Evening session did not discuss transition period in more detail
Thank you for your contributions and speak to you again tomorrow!

Slides with (anonymised) notes will be shared via the RS website
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## Our agenda

<table>
<thead>
<tr>
<th>Yesterday</th>
<th>Today</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Update on process and timeline</td>
<td>• Outcomes of yesterday’s discussions: Continuation of the discussion on a transition period</td>
</tr>
<tr>
<td>• Bringing everybody up to speed on the responsible sourcing discussions to date</td>
<td>• Post-transition requirements, claims and logos</td>
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<tr>
<td>• Transition period: What could it look like and what would be its implications?</td>
<td>• Product labelling and underlying mechanisms</td>
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<td>• Scrap “project”</td>
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Process and timeline for steel product certification requirements

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Nov-Jan
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Feb
- SACC / Board approval to go to vote
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- Board ratification of requirements
Draft Responsible Sourcing Criteria

- Published twice for stakeholder consultation and discussed with members and stakeholders thereafter
- Consensus on 1 and 2 and 5, with detail still to be agreed
- 4 and 5 subject of discussions and today’s focus

1. Commit to responsible sourcing
2. Know your upstream supply chains
3. Promote good ESG practices in supply chains
4. Achieve minimum ‘Input Material Score’
5. Report on responsible sourcing

✔

Might be added to existing Standard

95% of mined material origin to be known
30% of scrap “origin”

High-level information, not commercially sensitive

Shares TBC
Draft Responsible Sourcing Criteria

1. Commit to responsible sourcing
2. Know your upstream supply chains
3. Promote good ESG practices in supply chains
4. Achieve minimum ‘Input Material Score’
5. Report on responsible sourcing

Mined materials:
- Apply RS-recognised ESG standard
- Achieve threshold level of ESG performance

Scrap:
- Encourage use of management systems
- Assess ESG risk and support risk reduction

- Are associated with point scores which result in the ‘Mined Material Score’ and the ‘Scrap Score’
- These are combined to produce the ‘Input Material Score’
Recognised mining programmes

<table>
<thead>
<tr>
<th>TSM</th>
<th>IRMA</th>
<th>Bettercoal</th>
<th>Point score</th>
</tr>
</thead>
<tbody>
<tr>
<td>C</td>
<td>--</td>
<td>Misses</td>
<td>--</td>
</tr>
<tr>
<td>B</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>A</td>
<td>40 critical requirements met</td>
<td>Partially Meets</td>
<td>1</td>
</tr>
<tr>
<td>AA</td>
<td>50</td>
<td>Substantially Meets</td>
<td>2</td>
</tr>
<tr>
<td>AAA</td>
<td>75</td>
<td>Meets</td>
<td>3</td>
</tr>
<tr>
<td>--</td>
<td>100</td>
<td>--</td>
<td>4</td>
</tr>
</tbody>
</table>

Initially recognised programmes, we might recognise more programmes going forward. E.g. ASI for aluminium or FSC for forest products such as charcoal

Point score of 1 proposed to be threshold for ESG performance

Recognition methodology and draft assessment results will be published in a few days’ time for stakeholder feedback
Concerns: Lack of participating mines and processing sites

- Not many mine sites participate in a recognised programme, let alone have demonstrated a decent ESG performance in a third-party audit under that programme.
- For upstream processors, there are currently 2 ESG standards we could recognise (ASI (only for aluminium) and TSM (also applies to smelters and refiners, but focus is on mining) but uptake is still low. IRMA is developing a Minerals Processing Standard and the ResponsibleSteel Standard could be applicable too.
- Mining and processing sectors are at early stages of responsibility journey, need to build awareness and capacity on ESG issues.
- ResponsibleSteel should not set requirements that are currently unattainable.
- Risks that ResponsibleSteel certification will not lift off for a number of years.
Concern: Scrap requirements unworkable

- Sheer number and nature of suppliers makes it almost impossible to determine “origin” of scrap
- Sector seems reluctant to change. Awareness-raising and buy-in needed
- No comprehensive ESG standard yet for scrap suppliers

Thousands of individuals and very small businesses collecting scrap

Aggregators, small and large

Steel customers
Transition period could be a potential solution

To help get miners and upstream processors moving:

- Suppliers to sign a letter of intent that they will have a third-party audit against a recognised ESG standard within 18 months
- Would not be expected to meet a certain ESG performance level, just to understand their gaps
- A certain share of suppliers (or volume of material?) would have to be covered by audits, at least 50%?

To make progress on scrap:

- Identify and assess ESG risks related to countries in which scrap was aggregated and processed
- Help initiate and support a project, led by the scrap sector, to create an ESG standard for scrap companies (ISO Standard in development)

Based on this, steel sites could be “provisionally certified”, knowing that there might be serious ESG issues in supply chains. 3-year transition period, stricter requirements post-transition
Transition period could be a potential solution

Alternative:

- “Provisional certification” is of little value to steel companies. Stick to our original plan that suppliers must meet a threshold level of performance, but limit requirement initially to key input material, i.e. iron ore, coal

- Scrap suppliers of a certain size could be expected to have ISO 9001 + 14001 + 45001 for quality, environmental and health & safety management
Transition period could be a potential solution

Comments and questions on transition period and provisional certification (evening session):

• Threshold on share of suppliers that need to be covered initially? -> Yes, maybe 50%

• Limiting to 1 of the input materials, would have to be very clear about that, not comfortable with this

• Use recycled content label as blueprint? -> RS to look into this

• Uptake of management systems in scrap sector very low. Need a threshold, think about timing of having to meet the requirements

• For scrap: Overregulated countries (e.g. on money laundering) could be “excluded” from scrap requirements. Integrate regulation into our requirements to set a higher bar for underregulated countries?

• Big investments being made in steel sector to transform. Transition period sensible but do not accept “its too hard”
Transition period could be a potential solution

Comments and questions on transition period and provisional certification (morning session):

• Provisional certification with transition seems sensible

• It is demonstrating commitment and reflects where the world is today, so there should be value to customers in a transition period

• Integrate next required level in standard. E.g. Green Star does that and works well. Standard says what can be done today and also what is expected in the future. E.g. has requirements for how a building must “look like” in 2030. Where is the world today and where do we want it to be in the future?

• Accompany transition period with actions, cannot get stuck at low bar

• Call it “Phase 1” instead of “Provisional”?

• Should we even call it “certification” combined with the term “responsible”? There is no link to ESG performance, so we could be facing greenwashing concerns
Transition period could be a potential solution

Comments and questions on transition period and provisional certification (morning session contd.):

- Directors Declaration on ESG performance as the first option for mine performance instead of 3rd party audit? -> Letter of intent achieves the same outcome and we suggest to give mines 18 months to have the audit

- First phase to address investor needs only? Would help secure funding for investment needed to make change happen. Investors have to diversify, need options since there are not many responsible choices. Transition-themed bond. -> RS is already used in investment decisions and while we should cover investor needs, this would not solve the questions we are grappling with

- Is there appetite by miners to become “certified”? -> RS is asking figures from mining programmes

- Scrap: sector probably needs more time and needs awareness-raising
Transition period could be a potential solution

Polling questions:

“Are you supportive of a transition period with ‘provisional certification’?” → 67% responded “yes”

“Is 50% an appropriate minimum percentage to start with?” (evening session only) → Opinions split

- No matter which %, you need transparency
- Purchaser pressure important to get mines going
- Could be sufficient for steel companies to make the ask to suppliers, but don’t punish them if their suppliers have not been audited in sufficient volumes yet
- Having different requirements for scrap make sense
- RIOS standard applicable? → RS has contacted RIOS but did not get response. Will try again
- Code of Conduct for automotive recyclers in Canada that many scrap companies have signed up to → RS will look into this
**Post-transition requirements – as proposed during consultation**

Calculation of the ‘Mined Material Score’ based on pre-determined point scores for achieved ESG performance at mine sites

<table>
<thead>
<tr>
<th>TSM</th>
<th>IRMA</th>
<th>Bettercoal</th>
<th>Point score</th>
</tr>
</thead>
<tbody>
<tr>
<td>C</td>
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<td>Misses</td>
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</tr>
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<td>AAA</td>
<td>75</td>
<td>Meets</td>
<td>3</td>
</tr>
<tr>
<td>--</td>
<td>100</td>
<td>--</td>
<td>4</td>
</tr>
</tbody>
</table>
Post-transition requirements – as proposed during consultation

Example of a calculation at a processing site based on simple formulas:

Mine site point score x tonnes purchased from that mine site = mine site Mined Material Score
Sum of all mine site Mined Material Scores / Total tonnes purchased = Processing site Mined Material Score

<table>
<thead>
<tr>
<th>Mined material</th>
<th>ESG achievement level</th>
<th>Mine Site Point Score</th>
<th>Tonnes purchased</th>
<th>Total Mined Material Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Iron</td>
<td>TSM AA</td>
<td>2</td>
<td>500.000</td>
<td>1.000.000</td>
</tr>
<tr>
<td>Limestone</td>
<td>IRMA 75</td>
<td>3</td>
<td>30.000</td>
<td>90.000</td>
</tr>
<tr>
<td>Chrome</td>
<td>IRMA 50</td>
<td>2</td>
<td>7.500</td>
<td>15.000</td>
</tr>
<tr>
<td>Coal</td>
<td>Bettercoal 1</td>
<td>1</td>
<td>400.000</td>
<td>400.000</td>
</tr>
<tr>
<td>Zinc</td>
<td>TSM AAA</td>
<td>3</td>
<td>7.000</td>
<td>21.000</td>
</tr>
<tr>
<td>Coal</td>
<td>Bettercoal 3</td>
<td>3</td>
<td>200.000</td>
<td>600.000</td>
</tr>
<tr>
<td>Different materials</td>
<td>None</td>
<td>0</td>
<td>1.200.000</td>
<td>0</td>
</tr>
<tr>
<td>from different mines</td>
<td></td>
<td></td>
<td></td>
<td>0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td>2.344.500</td>
<td>2.126.000</td>
</tr>
</tbody>
</table>
Example of a calculation at a steel site, based on the Scores of the processors that supply the site

RS would provide a simple Excel sheet to do the calculation at each step of the supply chain

### For a steel site:

<table>
<thead>
<tr>
<th>Processor Mined material Score</th>
<th>Tonnes purchased</th>
<th>Total Mined Material Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.91</td>
<td>400.000</td>
<td>364.000</td>
</tr>
<tr>
<td>0.85</td>
<td>500.000</td>
<td>425.000</td>
</tr>
<tr>
<td>1.22</td>
<td>600.000</td>
<td>732.000</td>
</tr>
<tr>
<td>0.97</td>
<td>500.000</td>
<td>485.000</td>
</tr>
<tr>
<td>0</td>
<td>1.000.000</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>3.000.000</strong></td>
<td><strong>2.006.000</strong></td>
</tr>
</tbody>
</table>

### Processing Site Mined Material Score: 0.91

### Steel Site Mined Material Score: 0.67
Post-transition requirements – as proposed during consultation

To become certified, a steel site would have to achieve at least Level 1 of 3:

- 0.50 – 0.99 = Level 1
- 1.00 – 1.99 = Level 2
- 2.00 – 2.99 = Level 3
- > 3.00 = Level 4 (aspirational, currently not awarded)

The site could label all its steel as ‘RS certified’ but would have to communicate which Level it has achieved.

Comments and questions on the scores, calculations and Levels (morning session):

- Is it appropriate to state that TSM A, IRMA 40 criticals and Bettercoal Partially Met are roughly equal?
- Should not only take account of volume but also of price or other factors to not skew the calculation?
- Are the Levels set right or are they too ambitious?
- Would it make sense to focus initially on the key input materials iron ore and coal?
Comments and questions on the scores, calculations and Levels (evening session):

- Are different Levels helpful? Make it more complicated
- Levels can be useful to move things forward and to keep the nuance. Levels recognise that this is a journey and help reward steps on that journey
- Raise bar as time goes by rather than have Levels
- Higher mine performance would still be reflected in score even if you had only 1 Level
- What is the best mechanism for driving improvement over time? Usually, programmes rely on the market
Product labelling

• 3 options:
  1. Labelling all products as ‘RS certified’
  2. Labelling the share of products that equals the share of ‘certified’ input material received, or
  3. Hybrid model where you label all products but state the % of certified input material that is being sourced

• None of the options allow tracing back input material to its origin, mixing and blending throughout the supply chain is possible

-> Members seem to be of split minds on the options

1. Labelling all products:
• to keep it simple
• “responsibly sourced” is not an inherent product characteristic, should not discriminate your other products since they are the same
## Product labelling

2. Labelling only a share of products:

- Mass balance
- % certified input material = % certified labelled product
- Same system as for renewable energy

| Reflects more honestly how far you have come in working with certified suppliers | But creates the impression that the labelled product is better than the non-labelled |
| Applied in many other sectors, e.g. aluminium, so seems to work | Communication and marketing difficult (which customers get the certified products, what do you do when you run out of certified product?) |
3. Labelling all products but stating the % of certified input material that is being sourced:

- “sourced” means it might not be contained in the product
- Easier to implement and communicate, but honest at the same time
- Same system as is renewable energy
Comments and questions on product labelling (evening session):

- 3. option minimises the effort that companies have to go through to get to the stage where they can label
- 1st option is what some industries do, is simple
- If site is certified to existing standard, could you not simply say your product comes from a certified site? -> additional requirements and being able to label product is a way of providing additional incentive to steel companies
- Percentage is a good way to differentiate from peers and for marketing to push further since customers want higher performance
- Percentage of what? Also, the percentage creates the impression that the particular product is “better” than the rest, which it isn’t since sourcing responsibly does not change the product in any way
Comments and questions on product labelling (morning session):

• In renewable energy you get the "right" to that renewably produced electricity since you are paying the price for it, even if you don't get the actual energy from renewables. Would be the same mechanism here

• Rather than calling it “product certification”, tie it to the manufacturer or product line? It seems to create a lot of problems to call it “product” when our requirements are not about the product

• If you can't say that the steel you are using is responsible, then what value is there? Downstream wants to say this but only on the proportion that is indeed “responsible”, needs to be honest
Product labelling

Polling question:

“Would you prefer 1. Labelling all products as certified, 2. Labelling only the share of products that equals the share of certified input material that is being sourced, or 3. Labelling all products but stating the share of certified input material that is being sourced?”

-> Opinions split, no clear preference for any of the options
Scrap project

- Raise awareness with scrap sector
- Approach some of the main scrap associations
- Aim is to initiate and support a project with the sector to create an ESG standard for scrap companies that RS can recognise
- Project should be led by the scrap industry to create sense of ownership
- Could tie into the ISO process that develops a standard for the sustainable management of secondary metals

Looking for partners to scope plan and start outreach -> RS to reach out to members on this
Thank you very much for your contributions!

We will invite you all to another meeting on responsible sourcing to be held in late October.

Slides with anonymised notes will be shared via the RS website.