

# THE CASE OF VOLKSWAGEN

## The CID002567 Footprint: Tracking Sudan's Gold Through Global Supply Chains



April 2026

# Executive Summary

Since the outbreak of war in Sudan in April 2023, gold has become the central pillar of war finance. As the formal export system collapsed and smuggling networks expanded across borders, gold emerged as the primary source of foreign currency for the warring parties. Official and international reports estimate that military actors generate millions of dollars per day from gold-related activities, reinforcing a parallel economy that prolongs the conflict and weakens state institutions.

In 2024, the Sudan Gold Refinery in Khartoum (Smelter ID: CID002567) continued to appear within global supply-chain reporting frameworks, including in the Volkswagen Group's 2024 Responsible Raw Materials Report, an annual corporate disclosure outlining the company's due-diligence efforts to identify and manage risks in its raw-material supply chains. This occurred despite the refinery having been seized by the Rapid Support Forces (RSF) in May 2023 and subsequently rendered non-operational. Satellite imagery from 2023–2025 confirms progressive destruction of infrastructure and complete cessation of industrial activity.

## **This raises a fundamental question:**

How can gold attributed to a refinery that has been militarily seized, looted, and physically destroyed continue to appear within international supply chains?

**This is not merely an administrative oversight. It exposes a serious structural gap in corporate due-diligence systems governing minerals sourced from conflict-affected areas.**

**Following the takeover of the refinery, approximately 1.3–2.7 tonnes of gold and 15 tonnes of silver were reportedly seized with an estimated value of over USD 150 million. Subsequent investigations indicate that Sudanese gold has been transported through Chad and South Sudan and re-exported via Dubai, reflecting a well-established pattern in which conflict-linked gold is reintegrated into global markets through regional trading hubs. The gap between domestic production figures and export statistics in neighbouring countries further supports evidence of large-scale smuggling.**

# 2

---

**Volkswagen represents an important case study. Although the company has stated in public statements to the press that inclusion of a smelter in its reporting does not imply direct sourcing, international standards on Responsible Business Conduct - including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas - place the burden of verification squarely on companies.<sup>1</sup> Supply-chain complexity does not exempt corporations from responsibility. Continued listing of a non-compliant smelter operating in a war zone indicates deficiencies in early-warning and filtering mechanisms.**

This issue extends far beyond a single company. Numerous multinational corporations have reported supplier networks that include the Sudan Gold Refinery despite its non-compliant status and documented shutdown. The case therefore illustrates a systemic weakness in global mineral governance frameworks, particularly in high-risk jurisdictions.

**The war in Sudan is not financed solely through domestic mechanisms. It is embedded within transnational economic networks in which natural resources are exchanged for liquidity, weapons, and logistical support. Allowing conflict-linked gold to circulate within international markets:**

- Entrenches a parallel militarised economy
- Accelerates institutional erosion
- Prolongs armed conflict
- Converts human suffering into cross-border profit

The report aims to make it more costly - politically, legally, and reputationally - for companies to trade gold linked to Sudan's conflict. This accountability is not only about punishing companies, but about creating incentives for responsible behaviour that supports peace and post-war reconstruction and creating channels for the Sudanese public to track the extraction of its resources and their connection to continued militarization.

<sup>1</sup> The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas is the primary international framework governing responsible mineral sourcing. It provides a risk-based process for companies to identify, assess, and mitigate risks such as conflict financing, human rights abuses, and corruption in mineral supply chains.

## We Call:

### **Volkswagen and similarly implicated corporations to:**

- Fully disclosure of suppliers and intermediaries connected to CID002567
- Conduct independent and transparent supply-chain audits
- Strictly and publicly align with OECD standards, supported by externally verifiable mechanisms

### **Volkswagen and similarly implicated corporations to:**

- Immediately suspend trade in conflict-linked Sudanese gold
- Independently investigate exposure risks
- Strengthen early-warning systems for non-compliant smelters

### **Civil society:**

- Expand ethical and political scrutiny of natural resource chains and other means of war financing.
- Monitor any international gold flows linked to CID002567
- Collectively advocate against the reintegrating of conflict gold into global markets

Stopping the flow of conflict gold is not only a moral imperative. It is a structural prerequisite for ending war finance in Sudan.

This report has been produced by the Sudanese Centre for Environmental and Social Studies (CESS) as part of a broader effort to establish transparent mechanisms for tracking and accountability concerning financial flows and economic interests that continue to sustain the current war in Sudan. By documenting supply-chain linkages and identifying structural weaknesses in global due-diligence systems, this work contributes to building a framework capable of interrupting war finance and protecting Sudan's natural resources from further exploitation. Established in 2021, CESS is an independent Sudanese research organization focusing on environmental, economic, and social issues. Its work is grounded in an understanding of the connections between natural resources, extractive industries, human rights, environmental degradation, and forms of economic exploitation in Sudan.



# Contents

<b>Introduction</b>	7
<b>Seizure of Sudan's Gold Refinery and Financing of the War</b>	9
Verification of satellite evidence: satellite images and refinery shutdown	10
Routes for smuggling Sudanese gold and reintroducing it into global markets	14
<b>The appearance of the Sudan Gold Refinery in Volkswagen's Responsible Raw Materials reporting</b>	15
<b>What are we demanding from Volkswagen?</b>	18
<b>Conclusion</b>	19



# Introduction:

In recent years, global demand for gold has surged dramatically. International companies, central banks, financial institutions, and private investors have increased gold purchases in response to market volatility, geopolitical fragmentation, sanctions regimes, and growing uncertainty surrounding the stability of the US dollar. Gold prices have reached historic highs, and central bank reserves continue to expand at record levels. This global environment of uncertainty and financial hedging has significantly intensified demand for gold, creating powerful incentives for rapid sourcing—often in high-risk environments where oversight mechanisms are weak. The current surge in global gold accumulation forms the broader structural context within which Sudanese conflict-linked gold is being absorbed into international markets.

Since April 2023, the war in Sudan has been described as the world's largest humanitarian crisis, leaving tens of thousands dead and more than 13 million citizens displaced from their homes.<sup>2</sup> It has caused the deterioration of basic services and destroyed the country's infrastructure.<sup>3</sup> The continuation of these tragedies depends mainly on funding from various sources, foremost among which is gold mining, which has become the main source of arms and finance for the warring parties.<sup>4</sup> Ending this war requires stopping the exploitation of gold, which fuels it and deprives the Sudanese people of peace and development.

<sup>2</sup> UN News. (2026, January 9). Sudan - After a thousand days, civilians pay the price of a war they did not choose [Sudan - Ba'd alf yawm, al-madaniyun yadfa'un thaman harb lam yakhtaruhaj]. <https://news.un.org/ar/story/2026/01/1144008>

See also: UN High Commissioner for Refugees. (2025). Sudan situation map weekly regional update - 1 December 2025 [Map/infographic]. data.unhcr.org.

<https://data.unhcr.org/en/documents/details/119998>.

<sup>3</sup> International Committee of the Red Cross. (2025). Sudan: Attacks on critical civilian infrastructure surge amid escalating fighting. <https://www.icrc.org/en/news-release/sudan-attacks-critical-civilian-infrastructure-amid-escalating-fighting>.

<sup>4</sup> Sudan Transparency & Policy Tracker. (2024). Fueling Sudan's war: How gold exports and smuggling are prolonging Sudan's war. <https://sudantransparency.org/wp-content/uploads/2024/10/GoldSectorEN.pdf>.



Many reports frame the war as a form of competition over the country's resources<sup>5</sup>. Numerous international reports have highlighted how Sudanese gold is being smuggled out of the country reintroduced into regional and international markets<sup>6</sup>, generating huge profits for external parties in exchange for providing weapons and logistical support back to the warring parties. Since 2020, an arms race involving the Rapid Support Forces has been observed and reliably reported. This military buildup was fuelled by the export of gold, with the proceeds extensively invested in acquiring four-wheel-drive vehicles and other military systems<sup>7</sup>. Even before the war, investigative reports exposed the relationship between the Rapid Support Forces and the United Arab Emirates<sup>8</sup> a clear evidence that the war has turned into a cross-border economy based on bartering resources for weapons. Therefore, the continuation of the armed conflict depends not only on local actors, but also on regional and international parties that see the war as an opportunity for profit and influence. Companies and countries that have been benefiting from these networks must act on their responsibility of due diligence and make strenuous efforts to limit the profits that are being turned into weapons murdering the people of Sudan.

<sup>5</sup> Lewis, A. (2025, March 21). Nazra fahisa ma asbab al-harb fi al-Sudan? [A closer look: What are the causes of the war in Sudan?]. Reuters. <https://www.reuters.com/ar/world/EOTHCVZ7R-OTDN5HL234LU6D3A-2025-03-21/> See also: Abdelrahman M.S., 2023. Sudan's other war: The place of gold in war economics. Sudan Transparency and Policy Tracker. URL: <https://sudantransparency.org/sudans-other-war-the-place-of-gold-in-war-economics/>.

<sup>6</sup> African Gold Report. (2025). Sudan – African gold trade flows. AfricanGoldReport.org. <https://www.africangoldreport.org/sudan>.

<sup>7</sup> Global Witness. (2020, April). How the RSF got their 4x4 technicals: The open-source intelligence techniques behind our Sudan exposé. <https://globalwitness.org/en/campaigns/conflict-resources/how-the-rsf-got-their-4x4-technicals-the-open-source-intelligence-techniques-behind-our-sudan-expose/>

<sup>8</sup> Donovan, N., Kent, R., & Aboelgheit, M. (2025). How the RSF got their 4x4 technicals: The open source intelligence techniques behind our Sudan exposé. Global Witness. <https://globalwitness.org/en/blog/how-the-rsf-got-their-4x4-technicals-the-open-source-intelligence-techniques-behind-our-sudan-expos%C3%A9> Also: Soliman, A., & Baldo, S. (2025). Gold and the war in Sudan. Chatham House.

# Seizure of Sudan's Gold Refinery and Financing of the War

---

The Sudan Gold Refinery was established in 2012, during the height of Sudan's economic crisis<sup>9</sup>. The refinery's establishment coincided with the expansion of the mining sector in search of economic alternatives to substitute the loss of oil revenues after the independence of South Sudan. The refinery played a pivotal role in organising the gold export process, in which gold is refined and purified to a high degree of purity (999.9). This procedure facilitates the accurate assessment of exported quantities, the determination of the government's share of production, and the calculation of export revenues converted into foreign currency, which contributes to providing the currency needed to import basic commodities. Consequently, most of the gold in the refinery belongs to producers and companies that carry out the refining process as a mandatory government procedure.

As a cornerstone of this mandatory process, the refinery is assigned a permanent digital footprint within the international supply chain tracking systems for high-risk metals organised by the Responsible Mining Initiative (RMI), where it has the Smelter Identification Number CID002567. This code allows for the tracking of which supplier networks continue to involve the refinery, insofar as they are subject to RMI reporting requirements.

---

**The Responsible Minerals Initiative (RMI) is an industry programme under the Responsible Business Alliance that provides tools and standards to help companies conduct due diligence on mineral supply-chains.**

---

9

---

<sup>9</sup> BBC Arabic. (2012, September 20). Al-Rais al-Sudani yafatihu awwal masfat lil-dhahab fi al-bilad [Sudanese President opens the country's first gold refinery]. [https://www.bbc.com/arabic/middleeast/2012/09/120920\\_sudan\\_gold\\_refinery](https://www.bbc.com/arabic/middleeast/2012/09/120920_sudan_gold_refinery)

A turning point in the exploitation of the mining sector to finance the war was the Rapid Support Forces takeover of the National Gold Refinery in Khartoum on 24 May 2023. The forces seized approximately 1.3 tonnes of unrefined gold and 15 tonnes of silver ready for export, with an estimated value at the time of approximately \$150 million.<sup>10</sup> The Sudanese Minister of Finance confirmed this and indicated that the quantity amounted to approximately 2.7 tonnes.<sup>11</sup> The Minister of Minerals stated that these quantities had been previously documented and allocated to the Central Bank, the Ministry of Finance, private companies and the state's strategic portfolio, but that the Rapid Support Forces seized them in their entirety less than 40 days after the outbreak of the war.<sup>12</sup>

# 10

---

<sup>10</sup> Abdelrahman M.S., 2023. Sudan's other war: The place of gold in war economics. Sudan Transparency and Policy Tracker. URL: <https://sudantransparency.org/sudans-other-war-the-place-of-gold-in-war-economics/>.

<sup>11</sup> Sudan Tribune. (2024). Sudanese minister accuses RSF of looting gold and silver. <https://sudantribune.com/archives/282483>.

<sup>12</sup> Ibid

# Verification of Satellite Evidence: Satellite Images and Refinery Shutdown

This investigation relied on a temporal analysis of high-resolution satellite imagery covering the location of the Sudan Gold Refinery in Khartoum during the period from April 2023 to June 2025, as well as interviews with employees of the refinery. Further proof can be found in changes in Sudanese gold export policy, specifically the 11th of June 2023 operational policy changes by the Bank of Sudan which dictated that gold exports go through the Sudanese Standards and Metrology Organization (SSMO) or the Ministry of Mining, and not the refinery. The comparative analysis shows fundamental structural changes within the site that indicate gradual destruction and a complete cessation of industrial activity. The CID002567 gold that appeared in the Volkswagen Raw Minerals Report 2024 is highly likely to be the gold reported as stored in the refinery.

# 11

- **April 2023: The refinery appears to be in a relatively normal operating condition, with complete industrial buildings, intact roofs, and clear storage areas.**



Sudan Gold Refinery, April 2023

- **November 2024: Extensive destruction of infrastructure, burnt buildings, collapsed roofs, and the disappearance of industrial equipment that was previously visible.**



Sudan Gold Refinery, November 2024.

- **February 2025: Continued deterioration, with large parts of the site transformed into areas devoid of any operational infrastructure, with the remains of burnt or demolished facilities.**

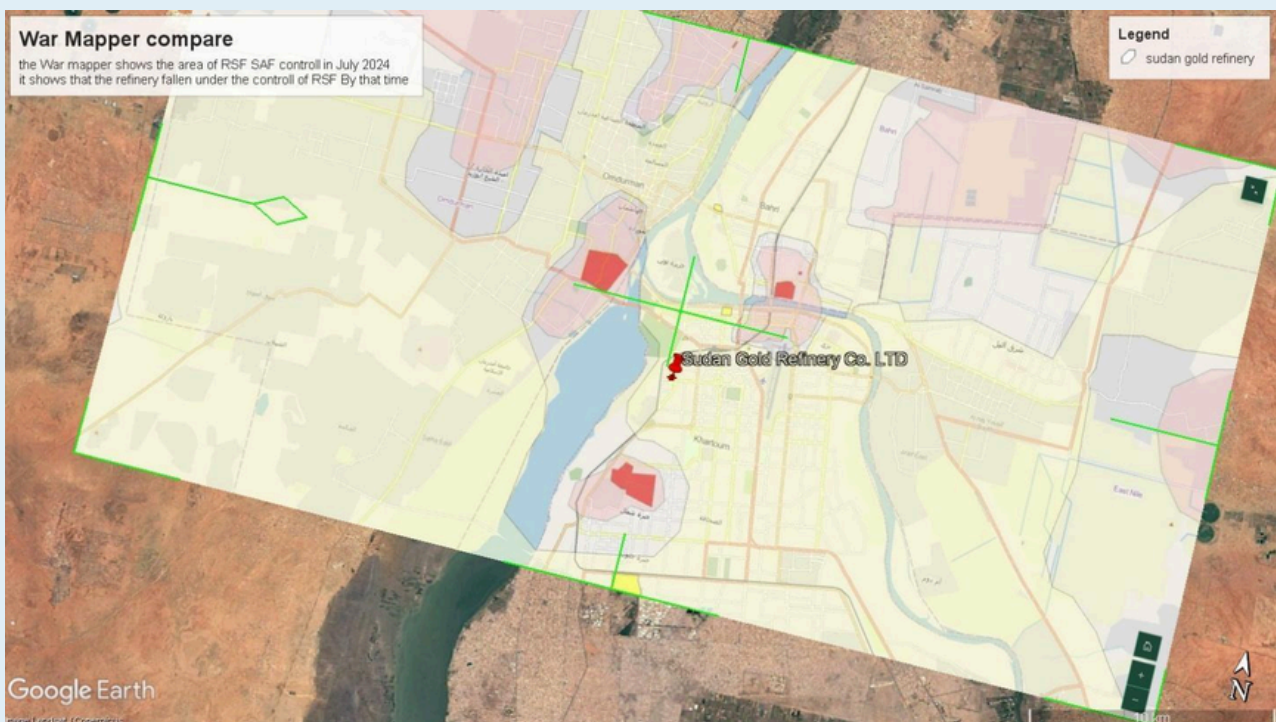


Sudan Gold Refinery, February 2025.

## To clarify the spatial context:



**A comparison with military control maps shows that the refinery was located within areas controlled by the Rapid Support Forces by July 2024, which is consistent with the timing of the destruction and subsequent shutdown.**



[Comparison of the refinery's location with military control maps – War Mapper]

**The images, maps and tracking we have carried out show the following:**

Satellite evidence indicates that the Sudan Gold Refinery was not operationally capable of producing or refining new gold from an early stage, at least before the signs of shutdown and destruction shown in the aerial images were complete. Therefore, any gold attributed to this refinery after its actual shutdown cannot be considered the result of legitimate or regulated industrial activity. It is more probable that the gold originated from pre-existing reserves that were either looted prior to or during Rapid Support Forces control, or that it was taken from stocks stored and confiscated following liquidation by a private owner.

**Thus, accountability shifts from a level of "unawareness" to a level of documented evidence, especially when the refinery continues to be listed as part of international supply chains despite its cessation of operations on the ground, thereby leaving little room for companies to claim ignorance.**

# Routes for Smuggling Sudanese Gold and Reintroducing it into Global Markets

After seizing the Sudan Gold Refinery in 2023, independent reports documented the transfer of some of the looted gold through smuggling routes to Chad as a major transit point before heading to re-export markets.<sup>13</sup> A number of reports indicated that the Rapid Support Forces quickly began securing supply routes west into Chad and south through South Sudan after seizing large quantities of

gold and stabilising exports,<sup>14</sup> reflecting the transformation of gold into a cross-border financing channel on a larger scale. Recent investigations by reliable platforms, further verified by CESS through interviews with gold traders, concluded that large quantities of Sudanese gold and other materials have been crossing into Chad and South Sudan since the outbreak of the war, before being re-exported via Dubai, in a smuggling pattern that explains the gap between local production figures and the volume of exports recorded in neighbouring countries.<sup>15</sup>

# 15



<sup>13</sup> Mujo Press. (2023). Since the outbreak of war on 15 April 2023 between the Sudanese army and the Rapid Support Forces. Facebook. [https://m.facebook.com/story.php?story\\_fbid=pfbid032bUBy2v94xPv96TQNWToxeEnjbgvVhAttdVhZyFqvBoip53VsoG46JHwNxtFYSOFI&id=100063687034961](https://m.facebook.com/story.php?story_fbid=pfbid032bUBy2v94xPv96TQNWToxeEnjbgvVhAttdVhZyFqvBoip53VsoG46JHwNxtFYSOFI&id=100063687034961).

<sup>14</sup> Beam Reports. (2025). Blood Alloys: How Sudan Smuggles Gold to Fund Its Devastating War. Beam Reports. <https://www.beamreports.com/2025/05/18/%D8%B3%D8%A8%D8%A7%D8%A6%D9%83-%D8%A7%D9%84%D8%AF%D9%85-%D9%83%D9%8A%D9%81-%D9%8A%D9%87%D8%B1%D9%91%D8%A8-%D8%B0%D9%87%D8%A8-%D8%A7%D9%84%D8%B3%D9%88%D8%AF%D8%A7%D9%86-%D8%A7%D9%84%D8%B0%D9%8A-%D9%8A/?utm.com>.

<sup>15</sup> Darfur24. (2025). Smuggled gold fuels Sudan's war economy, report says. Darfur24. <https://www.darfur24.com/en/2025/09/27/smuggled-gold-fuels-sudans-war-economy-report-says>; Centre for Environmental and Social Studies (CESS). (2025). Monitoring gold mining performance in Sudan during 2024. Centre for Environmental and Social Studies. <https://cess-sudan.com/pdfs/Fuel%20of%20War%20and%20Resource%20Depletion.pdf>; SWISSAID. (2025). United Arab Emirates: More Than Ever a Hub for Conflict Gold. <https://www.swissaid.ch/en/media/united-arab-emirates-more-than-ever-a-hub-for-conflict-gold/>.

بمقارنة ختم مصفاة الذهب بين سبيكة تم نشر صورة لها في 2021م , و الختم الموجود على سبائك الذهب المنهوب من المصفاة , والذي يتم بيعه في نيالا و تشاد الآن , يتطابق الختم بصورة تامة بين الاثنين.

Image showing the Sudanese gold refinery's stamps matching those displayed in Chadian markets. Source: Mogo Press.

# The Appearance of the Sudan Gold Refinery in Volkswagen's Responsible Raw Materials reporting

The flow of gold did not stop at the region's borders but went beyond them to be reintegrated into the circuits of the global gold trade. According to a SWISSAID report, Dubai gold markets evolved as major importer of gold from African countries; they serve as a transition hub for African gold before it is reintegrated into global markets like Switzerland. Weak due-diligence measures in the UAE create a conducive environment for illicit gold trade, including dealing in conflict gold. The illicit gold trade from Sudan to the UAE diminishes the principal role of the Sudanese state in regulating gold trade: allowing or blocking its flow to global markets and hence weakens the monitoring of the flow of conflict gold.<sup>16 17</sup>

Even after April 2023, the Sudan Gold Refinery had remained a component of major global companies' supplier networks, despite its non-compliance with RMI standards.<sup>18</sup> Below is a non-exhaustive list of companies reportedly showing gold attributed to the refinery after its shutdown:

- 3M (2023, conglomerate, US)
- Applied Materials (2024, semiconductors, US)
- Avery Dennison (2023, packaging, US)
- Baker Hughes (2024, petroleum, US)
- Ballard Power Systems (2024, alternative energy, Canada)
- Cohu (2024, semiconductor, US)
- CONMED (2024, medical equipment, US)
- Cricut (2024, consumer electronics, US)
- Cummins (2024, heavy equipment/automotive, US)
- Dover (2024, conglomerate, US)
- Eastman Kodak (2024, electronics, US)
- Enerflex (2024, oil and natural gas, Canada)
- F5 (2024, technology, US)
- Fujitsu (2024, IT, Japan)
- Halliburton (2024, oil and gas, US)



<sup>16</sup> SWISSAID. (2024). On the trail of African gold: Quantifying production and trade to combat illicit flows. SWISSAID. [On the trail of African gold - Swissaid.](#)

<sup>17</sup> de Simone, S. (2025). The role of gold in the Sudanese war. ISPI. [https://www.ispionline.it/en/publication/the-role-of-gold-in-the-sudanese-war-207364.](https://www.ispionline.it/en/publication/the-role-of-gold-in-the-sudanese-war-207364)

<sup>18</sup> "Non-compliant" refers to a smelter or supplier that has not been verified as meeting recognized responsible-sourcing and due-diligence standards governing mineral supply chains.

- Keyence (2024, electronics, Japan)
- Kimball Electronics (2024, electronics, US)
- KLA (2024, semiconductor, US)
- Konica Minolta (2024, electronics, Japan)
- Lexmark (2024, computer, US)
- LivaNova (2024, medical devices, US)
- Lyft (2024, transport, US)
- Merck (2023, chemicals/pharmaceuticals, Germany)
- Microchip (2024, semiconductor, US)
- Mitsubishi (2024, conglomerate, Japan)
- Nokia (2024, telecommunication/electronics, Finland)
- Ouster (2024, lidar, US)
- Quantum (2024, data storage, US)
- Ricoh (2024, electronics/imaging, Japan)
- Rockwell Automation (2024, industrial automation, US)
- Sandvik (2023, engineering, Sweden)
- Semtech (2024, semiconductor, US)
- TE Connectivity (2024, electronics, Ireland/US)
- Tesla (2023, automotive/renewable energy, US)
- Zebra (2024, technology, US)

This list illustrates a global failure to disengage from this non-compliant supplier, despite the devastating humanitarian consequences of the war in Sudan and the role of gold as a conflict resource having become clear:<sup>19</sup>

According to the 2024 Responsible Raw Materials Report<sup>20</sup> issued by the Volkswagen Group, the Sudan Gold Refinery in Khartoum was amongst the 3TG smelters the group's suppliers dealt with in 2024<sup>21</sup> and it had been part of this list at least since 2021. An investigation by Deutsche Welle (2025) highlighted these and other potential pathways of conflict gold into the company's supply chain,<sup>22</sup> In response to DW, the company vaguely referred to 'complexity' of supply chains and claimed that the appearance of the Sudanese refinery in their raw material reporting "does not indicate that they are necessarily part of our supply chain". This statement indicates unwillingness to engage openly and proactively with the possibility of being complicit in war finance.<sup>23</sup>

<sup>19</sup> The list is based on a review of annual reports submitted to the US Securities and Exchange Commission and/or published on company websites. The year denotes the last reporting year for which a mention of CID002567 could be found. While many companies include reporting from 2023 they do not include the exact date and thus were not included in this list where the gold could have been sourced prior to the outbreak of the war.

<sup>20</sup> The Responsible Raw Materials Report is an annual disclosure published by Volkswagen Group that outlines the company's approach to identifying, assessing, and mitigating environmental and human rights risks in the supply chains of key raw materials used in its products. The report is part of Volkswagen's broader sustainability and supply-chain due diligence framework and is intended to demonstrate alignment with international responsible sourcing standards, including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, the UN Guiding Principles on Business and Human Rights, ILO core labour standards, and related ESG and regulatory frameworks.

<sup>21</sup> Volkswagen Group. (2025, 26 March). Responsible raw materials report 2024. Volkswagen Group. <https://www.volkswagen-group.com/en/publications/more/responsible-raw-materials-report-2024-2986>. While this version lists the Sudan Gold Refinery under a wrong identifier (CID000041), its CID here being taken by the Russian OJC Krastsvetmet, an earlier version uploaded elsewhere has the right information ([https://uploads.vw-mms.de/system/production/files/cws/041/425/file/1f1d1cad5cdf48d12529f96222b55642efcfed73/Volkswagen\\_Group\\_Responsible\\_Raw\\_Materials\\_Report\\_2024\\_1.pdf?1756735462](https://uploads.vw-mms.de/system/production/files/cws/041/425/file/1f1d1cad5cdf48d12529f96222b55642efcfed73/Volkswagen_Group_Responsible_Raw_Materials_Report_2024_1.pdf?1756735462)).

<sup>22</sup> Deutsche Welle. (2025). Are Volkswagen's EVs made with African conflict minerals? (Grzegorz Szymanowski, Tim Luimes, Zuza Nazaru). <https://www.dw.com/en/are-volkswagens-evs-made-with-african-conflict-minerals/a-74114710>.

MarketExpress. (2025). VW's EV minerals from Africa: Is Volkswagen's supply chain linked to conflict? <https://www.marketexpress.in/2025/10/vws-ev-minerals-from-africa-is-volkswagens-supply-chain-linked-to-conflict.html>. Yahoo News UK. (2025). Volkswagen's EVs are made with metals from African conflict zones, report says. Yahoo News UK. <https://uk.news.yahoo.com/volkswagens-evs-made-african-conflict-120700840.html?utm.com>.

<sup>23</sup> Ibid. This also includes several UAE-based companies such as Kaloti Precious Metals, a main purchaser of gold from Sudan.

In its Responsible Raw Materials Reports, the Volkswagen Group asserted continuously the further development of a red flagging system and ‘outreach’ activities to reduce non-conformant smelters from its supplier network: why, then, can obvious cases such as the Sudan Gold Refinery still slip through?

---

3TG refers to four minerals tin, tantalum, tungsten, and gold that are widely used in electronics, automotive components, and other manufactured products. These minerals are commonly referred to as “conflict minerals” in international supply-chain governance frameworks because their extraction and trade have, in some contexts, been linked to the financing of armed groups and human rights abuses in conflict-affected or high-risk areas. As a result, companies sourcing these minerals are expected to conduct due diligence on their supply chains in line with international standards such as the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

---

This justification does not exempt the company from responsibility for potential violations of its legal and ethical obligations, especially as it reflects benevolence and social responsibility through its refugees aid organisation.<sup>24</sup>

Worryingly, the Volkswagen Group is one of the few major German companies providing details on their 3TG supplier networks at all and yet still fails to provide full information and respond adequately to potential complicity. This also shows that more pressure on such companies is necessary, in Germany and beyond, especially given the dangerous signals towards deregulation coming from the current administration (in Germany).

It is important to emphasise that responsibility for due diligence lies solely with companies that intend to deal with this product, and with no other party. In this particular case, Volkswagen is solely responsible for determining the source of the gold, and no justification or explanation in good faith<sup>26</sup> can exempt it from this responsibility.

<sup>24</sup> Volkswagen Group. (n.d.) Refugee Aid. <https://www.volkswagen-group.com/en/refugee-aid-17293>.

<sup>25</sup> Mercedes-Benz’ Raw Material Report 2024 presented only theoretical ideas; the BMW Group published only a one-page Conflict Minerals Policy.

<sup>26</sup> <https://www.ohchr.org/en/special-procedures/wg-business/corporate-human-rights-due-diligence-identifying-and-leveraging-emerging-practices> See also: Organisation for Economic Co-operation and Development (OECD). (2016). OECD due diligence guidance for responsible supply chains of minerals from conflict-affected and high-risk areas. OECD Publishing. <https://www.oecd.org/en/publications/oecd-due-diligence-guidance-for-responsible-supply-chains-of-minerals-from-conflict-affected-and-high-risk-areas.htm>.

Volkswagen's involvement with suppliers importing gold from the Sudan Gold Refinery, as reported in the 2024 Responsible Raw Materials Report, sets a dangerous precedent for international companies' potential involvement in Sudan's war economy. It benefits from resources that finance the conflict. Sudanese gold is not only illegally seized but also extracted under extremely dangerous working conditions that endanger the lives of millions of workers and cause catastrophic environmental effects due to the use of toxic substances such as cyanide and mercury. It also destroys the lives and livelihoods of local populations and devastates nature reserves. Furthermore, direct military control over land, production, and trade operations is widespread throughout the country, which means that the crisis is not limited to the means of extraction but extends to numerous serious violations that breach due diligence standards.<sup>27</sup>

<sup>27</sup> Tarteel Amir, "Gold That Kills: The Mining Firms Devastating a Community," Atar Network, 17 November 2025, <https://atarnetwork.com/?p=17672> ; Mohamed Salah Abdelrahman, How Mercury is Poisoning a Nation: And Gross Mismanagement Is Aggravating the Problem, Sudan's Gold Curse Briefing Paper No. 1 (Sudan Transparency and Policy Tracker, October 2022); Mohamed Salah Abdelrahman, A Toxic Time Bomb: The Messy Handling of Cyanide and Thiourea in Sudan, Sudan's Gold Curse Briefing Paper No. 2 (Sudan Transparency and Policy Tracker, August 2023).

# What are We Demanding from Volkswagen?

We call on the international community, regulatory bodies and financial institutions to open a transparent investigation, publish its findings, and hold Volkswagen and all companies and institutions suspected to have dealt in conflict-linked Sudanese gold accountable, in accordance with the due-diligence principles set out in the Organisation for Economic Co-operation and Development (OECD) Guidelines on Responsible Supply Chains of Minerals from Conflict-Affected Areas.<sup>28</sup>

## **We call on Volkswagen and other companies dealing with purchasers of gold from Sudan to**

1. disclose the suppliers and intermediaries who continue to trade gold linked to the Sudan Gold Refinery (CID002567) and to gold production in Sudan dominated by armed actors, and to allow an independent review of this information.
2. Strictly and publicly align with international due-diligence standards (OECD) and relevant transparency standards and link any future engagement to externally auditable verification mechanisms.
3. Cooperate with independent organisations in efforts to expose conflict gold traders to ensure that Sudanese gold and other resources do not continue to be a tool for financing war and suffering.

# 20

---

**The responsibility to dry out war finances does not lie solely with international institutions but rather is a collective responsibility. Therefore, we call on Sudanese and international civil society organisations, public figures, professional associations and all segments of the Sudanese people at home and abroad to organise and collectively demand accountability for all parties involved in the trade of conflict gold.**

<sup>28</sup> Ibid

# Conclusion: Gold and War in Sudan

The 2023 war was not the beginning of the military institutions economic activity, which has long operated in parallel and independently of the formal economy. The gold mining sector during the last decade has seen a significant expansion in the involvement of military actors. The war has contributed to deepening military control over gold mining and trade, as it is the country's most important export and the primary source of foreign currency. For example, in 2024, areas controlled by the Sudanese Armed Forces announced that production had reached 64 tonnes of gold, with export revenues of \$1.6 billion,<sup>29</sup> which means that the parallel market, including the private sector and other military actors aligned with SAF, controlled approximately \$4 billion.<sup>30</sup> These rates doubled in 2025, which means further erosion of the state and its institutions in favour of the expansion of the parallel market of private traders and military influence.<sup>31</sup>

Media reports and investigations indicate that this takeover of the Sudan Gold Refinery was not an isolated incident, but rather part of a series of related operations that established war as a tool to help plunder these riches and transfer gold to export markets.<sup>32</sup> This role has continued, with other reports stating that sites affiliated with the Rapid Support Forces absorbed more than \$860 million worth of Sudanese gold in 2024, reflecting the transformation of gold into a major source of funding for the conflict. The continued use of gold as a major source of funding did not stop with the start of the war and large-scale illegal seizures but has been documented by numerous local and international official sources. According to the Sudanese government and the European Union,<sup>34</sup> the Rapid Support Forces' revenues amount to approximately \$3 million per day, and according to a report by the Security Council's Panel of Experts,<sup>35</sup> they reach approximately \$2.5 million per day, supporting the ability to independently sustain rearmament.

<sup>29</sup> Central Bank of Sudan. (2025). Foreign trade statistical digest: January–December 2024. Central Bank of Sudan. <https://cbos.gov.sd>.

<sup>30</sup> Suliman Baldo, Gold and the War in Sudan (Washington, DC: The Sentry, 2025); C4ADS, Bullion for Bullets: The Role of Mining in Sudan's Conflict Economy (Washington, DC: C4ADS, 2025). Production and export figures are based on data reported by the Sudanese Mineral Resources Company (SMRC) and the Central Bank of Sudan for 2024, which indicate 64.36 tonnes of gold produced in SAF-controlled areas and about 27.96 tonnes exported, generating roughly \$1.6 billion in revenue. See: Centre for Environmental and Social Studies (CESS). (2025). Monitoring gold mining performance in Sudan during 2024. Centre for Environmental and Social Studies. <https://cess-sudan.com/pdfs/Fuel%20of%20War%20and%20Resource%20Depletion.pdf>

<sup>31</sup> Centre for Environmental and Social Studies (CESS). (2025). Monitoring gold mining performance in Sudan during 2024. Centre for Environmental and Social Studies. <https://cess-sudan.com/pdfs/Fuel%20of%20War%20and%20Resource%20Depletion.pdf>

<sup>32</sup> Mujo Press. (2023). Since the outbreak of war on 15 April 2023 between the Sudanese army and the Rapid Support Forces. Facebook. [https://m.facebook.com/story.php?story\\_fbid=pfbid032bUBv2v94xPv96TQNWToxeEnjgVhAtDvHvZyFqvBojp53VsoG46JHwNxtFYSQFI&id=100063687034961](https://m.facebook.com/story.php?story_fbid=pfbid032bUBv2v94xPv96TQNWToxeEnjgVhAtDvHvZyFqvBojp53VsoG46JHwNxtFYSQFI&id=100063687034961).

<sup>33</sup> Sudan Tribune. (2025). Sudan accuses RSF of smuggling gold to UAE. Sudan Tribune. <https://sudantribune.com/article/307470>; citing confidential UN security report see: TRN Team, "The Gold Beneath the Blood: How Russia, the UAE, and a Shadow War Economy Are Tearing Sudan Apart," The Right Narrative, 3 October 2025, <https://therightnarrative.net/the-gold-beneath-the-blood-how-russia-the-uae-and-a-shadow-war-economy-are-tearing-sudan-apart/>; <https://sudanile.com/%D9%88%D8%B2%D9%8A%D8%B1-%D8%A7%D9%84%D9%85%D8%A7%D9%84%D9%8A%D8%A9-%D8%A7%D9%84%D8%B3%D9%88%D8%AF%D8%A7%D9%86%D9%8A-%D9%8A%D8%B9%D9%84%D9%86-%D9%86%D9%87%D8%A8-2700-%D9%83%D9%8A%D9%84%D9%88-%D8%BA/>

<sup>34</sup> ibid

<sup>35</sup> Walsh, D. (2024). The gold rush at the heart of a civil war. The New York Times. <https://www.nytimes.com/2024/12/11/world/africa/sudan-gold-rush-heart-civil-war.html>. Also: Soliman, A., & Baldo, S. (2025). Gold and the war in Sudan. Chatham House. URL: <https://shorturl.at/cgG7e>.

Despite the devastating war, Sudanese gold from areas controlled by different parties ends up in Dubai via various routes. Even in the face of diplomatic tensions between Sudan and the United Arab Emirates, official data shows that in 2024, more than 96% of Sudan's gold was exported to the UAE, while 84% of fuel was imported from the UAE.<sup>36</sup> Numerous reports also indicate that the main funding for the Rapid Support Forces comes through the UAE, including weapons and military equipment from European countries, such as France and Germany.<sup>37</sup> Thus, the consolidation of the regional trade centre and its continuous supply clearly indicates the use of gold to finance the conflict and the use of instability to drain the country's rich resources. The experience of Volkswagen is one example of how the UAE has been used as a key hub in production chains.

These facts require careful monitoring and tracking of any gold appearing on the global markets with the CID002567 identity to accurately monitor the fate of gold seized by the Rapid Support Forces, or any gold seized illegally, which requires expanding campaigns to raise awareness of the refinery's name and international identity and to encourage reporting any related issues. Curbing illegal seizures is essential to stopping the financing of war, and large-scale tracking makes gold a costly commodity for any local or international entity.

<sup>36</sup> Central Bank of Sudan. (2025). Foreign trade statistical digest: January–December 2024. Central Bank of Sudan. <https://cbos.gov.sd>.

<sup>37</sup> Deutscher Bundestag, Beitrag der Bundesregierung zur Minderung der humanitären Krise und Umsetzung der UN-Sanktionen im Sudan, Drucksache 21/2847, 18 November 2025; Amnesty International, “Sudan: French-manufactured weapons system identified in conflict – new investigation,” 14 November 2024, <https://www.amnesty.org/ar/latest/news/2024/11/sudan-french-manufactured-weapons-system-identified-in-conflict-new-investigation/>

