



LuNa
Smelter

2023 Sustainability Report

Contributing to a more sustainable world
through responsible mineral sourcing and processing



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Message from the Managing Director of LuNa Smelter

Luna Smelter's Third Sustainability Report

I am delighted to present LuNa Smelter's third Sustainability Report, meticulously crafted in alignment with the Global Reporting Initiative (GRI) standard.

Our organisation's unwavering mission is to serve as an industry catalyst for positive change and to champion diversity through strategic ESG-driven investments.

Our Commitment to Transparency and Progress

At LuNa Smelter, transparency is at the core of our ethos. We remain steadfast in sharing our journey, milestones, and ongoing initiatives as we relentlessly pursue excellence in our operations.

Driving Efficiency in Rwanda's Mining Industry

Since our inception in 2018, we have collaborated closely with industry stakeholders to elevate the efficiency and sustainability of Rwanda's mining sector.

Our commitment to innovation and continuous improvement sets us apart. Despite operating in a region classified as a Conflict-Affected and High-Risk Area (CAHRA), we take immense pride in announcing that LuNa Smelter maintains its certification from the Responsible Minerals Initiative. As Africa's sole conformant tin smelter, we are a testament to responsible practices and ethical leadership.

Continued on next page ▶



Joseph Butera

Managing Director

ENHANCING OUR GOVERNANCE STRUCTURE

Governance is pivotal in upholding the highest ethical standards and fostering continuous improvement within our company. In 2023, we conducted a gap assessment in our corporate policies, recognising that clear policies form the foundation for making the right decisions. As a result of this assessment, we have revised our existing policies and have developed two additional policies to respond to the gaps assessed. The two policies are: Employees Retention Policy and Environment Management Policy.

INTRODUCING ROBUST ESG DUE DILIGENCE

It's commendable that Luma Holding Group prioritises Environmental, Social, and Governance (ESG) principles and invests in ongoing training and development within its companies. By ensuring compliance with these principles and emphasising regular monitoring and correction of our operational impact, Luma Holding Group demonstrates a commitment to responsible and sustainable practices. This approach benefits the environment and contributes to the well-being of surrounding communities.

SCALING OUR BUSINESS THROUGH TOLLING SERVICES

In 2023, LuNa Smelter seized the opportunity to expand its business to offer toll smelting services to tin mines and traders in the African Great Lakes region. This initiative not only created job opportunities for local communities but also contributed to reducing the carbon footprint of the tin ingot produced for our customers. By bringing the smelting process closer to the source of the materials, we have significantly decreased the amount of waste material being shipped abroad for smelting, thereby reducing Scope 3 emissions. We are thrilled about the impact our tolling services will have on the development of further value addition in Africa. We eagerly anticipate working with others to expand this aspect of our business.

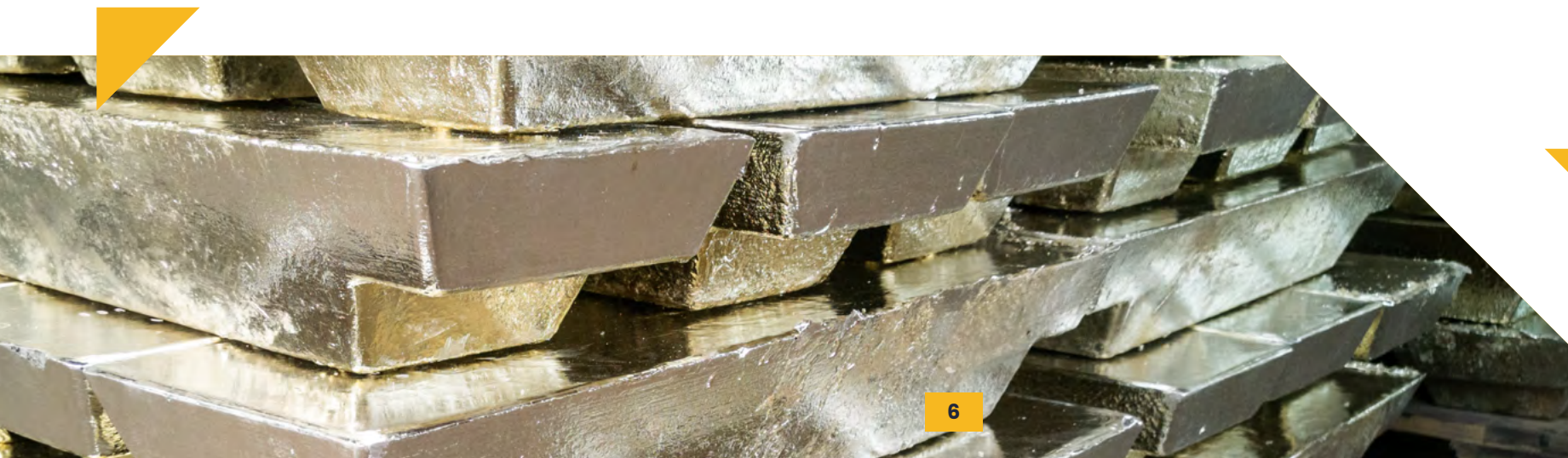
LOOKING FORWARD

Our commitment to responsible mining and production remains unwavering as our business expands. We achieve this by collaborating with responsible suppliers and supporting our host communities. Our goal is to maintain leadership in this space.

Thank you for joining us on this transformative journey. Together, we forge a path toward a more sustainable and equitable future.



Joseph Butera
Managing Director



About this report

Welcome to LuNa Smelter Third Annual Sustainability Report. This report serves as a vital communication channel, reaching out to the communities where we operate, our dedicated employees, discerning investors, and valued clients. Within its pages, we illuminate our most substantial environmental impacts, our interactions with people, including the profound implications for their human rights, and our steadfast governance approach. Through transparency and accountability, we forge a path toward sustainable progress.



This Report has been prepared in accordance with the Global Reporting Initiative (“GRI”) Standards core option.

Ngali Holdings Ltd
Luma Holding Ltd
Joint Venture



GRI 2

General Disclosures



Disclosure 2-1

Organization details

LuNa Smelter is a leading responsible, high-quality tin metal producer located and operating in Kigali, Rwanda.

LuNa Smelter, a part of Luma Holding Ltd., is a private European Industrial Group focused on the metallurgical, mining, and automotive industries. Ngali Holdings is the Rwandan partner and shareholder.

The company aims to act as an industry change agent and diversity champion through ESG-driven investments, emphasising traceability, gender equality, and unserved community development.

The Company operates one large scale mining licence in Gatsibo District and a certified laboratory, and modern smelting facility in Kigali.

As the only tin smelter in Africa conformant with the Responsible Minerals Assurance Process (RMAP) under OECD guidance, LuNa Smelter has significantly enhanced the metallurgical and mining sector of East Africa, particularly focusing on developing 3T mining projects.

From the outset, the company has been awarded the ISO certificates ISO 14001:2015, ISO 9001:2015, and ISO 17025, demonstrating its environmental awareness and commitment to quality management.

Further description of our business is available at:

<https://lunasmelter.com/about/>

ESG-based investment

A responsible tin metal production

the only RMI-certified tin smelter on the African continent with traceability based on the newest technologies implementation, including blockchain protocols for the mineral's origin.

Strong environmental focus

zero waste production based on electrical energy generated by renewable sources (67% of Rwanda power generation from renewable sources) and proximity to tin mining operations results in tin ingots with the lowest carbon footprint in the world.

Modern tin smelter production facility with own certified laboratory

quality exceeding LME standard and proved capacity for 99.995 Sn production.

Inclusion of the ASM community and small-scale miners

through fair partnership, educational packages, and real cooperation resulting in meaningful impact on the ground.

Disclosure 2-2

Entities included in the organization's sustainability reporting

This report shall only cover LuNa Smelter's activities and not activities of any other entity.

Disclosure 2-3

Reporting period, frequency and contact point



REPORTING PERIOD

1st January, 2023
– 31st December, 2023



DATE OF LAST REPORT

21st April, 2023

The sustainability report is released annually and is independent of the financial report.



CONTACT POINT

for questions about the report

Katarzyna Janik

Member of the Management Board

katarzyna.janik@lunasmelter.com



Disclosure 2-4

Restatement of Information

This is the second Sustainability report released based on GRI.

Disclosure 2-5

External assurance

An external party has been partially assured this report. The following audits were completed at LuNa Smelter.

ISO/IEC 17025:2017, the surveillance audit by **A2LA (American Association for Laboratory Accreditation)** took place in **24th June 2023**

performance was satisfactory, with no non-conformity raised. The re-certification is planned for June 2024.



ISO 9001:2015 and ISO 14001:2015 Bureau Veritas conducted a **Surveillance audit on 27-28 November 2023**

to ensure the continuity of the company management system implementation for both the quality management system and the environmental management system ISO 9001:2015 and ISO 14001:2015. Our compliance was approved by the external auditor.

The company is pursuing ISO 45001:2018

Occupational Health and Safety certification in 2024.



Disclosure 2-6

Activities, value chain and other business relationship



CASSITERITE SMELTED
(T)

1 255,37



TIN PRODUCED
(T)

781,78



LAB ANALYSIS COMPLETED
(INTERNAL & EXTERNAL)

4 297

On the other hand, LuNa Lab performed internal and external analysis on the following materials:

INTERNAL ANALYSIS		EXTERNAL SERVICES	
Metal samples	2 860	Cassiterite samples by ICP OES and WET chemistry	15
Cassiterite	581	Exploration samples	92
Slags	651	Lithium ore samples by ICP OES	21
Ferrosilicon	77		

LuNa’s product range is represented by tin ingots (LME grade, 3N, 4N, low-lead, and standard lead) and four types of by-products (tin dross, tin slag, hardhead, and tantalum-bearing alloy). All tin ingots produced by the plant are sold via European REACH-registered distributor Luma Trading.

Each planned shipment is verified according to the specifications required by the customer. LuNa Smelter can control the level of impurities during the smelting process on Tin to achieve the chemical composition desired by the client.

LuNa Smelter follows a complete transparency approach to satisfying customers’ needs. We allow third-party inspectors to be present during all processes of lot preparation.

The company’s strategy is to create a vertically integrated business that responds to the needs across the tin production supply chain. The Company works hand in hand with other concession owners within the country and across the region to supply the smelter, which has the capacity to **smelt over 360t of cassiterite per month**.



LuNa Smelter is licensed by the Rwanda Mines, Petroleum and Gas Board to run a mineral traceability and due diligence systems. This comes after two years of a pilot project tracing minerals from the mine to the end-user on a blockchain system. LuNa's system was developed with Minespider, Rwanda Mines, the Petroleum and Gas Board, and Google.



Disclosure 2-7

Employees

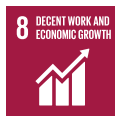


A key element contributing to LuNa Smelter’s success is our team. Luna Smelter aims to create the best working environment where employees feel valued. The Company culture is based on trust, professionalism, mutual respect, and support within the team.





Disclosure 2-8

Workers who are not employees





All workers engaged in the smelting business are employees of the company. The Company hires ten security guards through an external security service provider.

1. Total number of employees broken down by gender and employment contract

	 Female	 Male	Summary
Permanent	7	21	28
Fixed	2	74	76
Probation	2	3	5
			109

*All LuNa workers are based in Rwanda, and data provided below was collected by our Human Resources team.

2. Total number of employees broken down by gender and region of employment

	 Mines (Gatsibo)	 Smelter (Kigali)	Summary
Female	1	10	11
Male	36	62	98
			109

Disclosure 2-9

Governance structure and composition



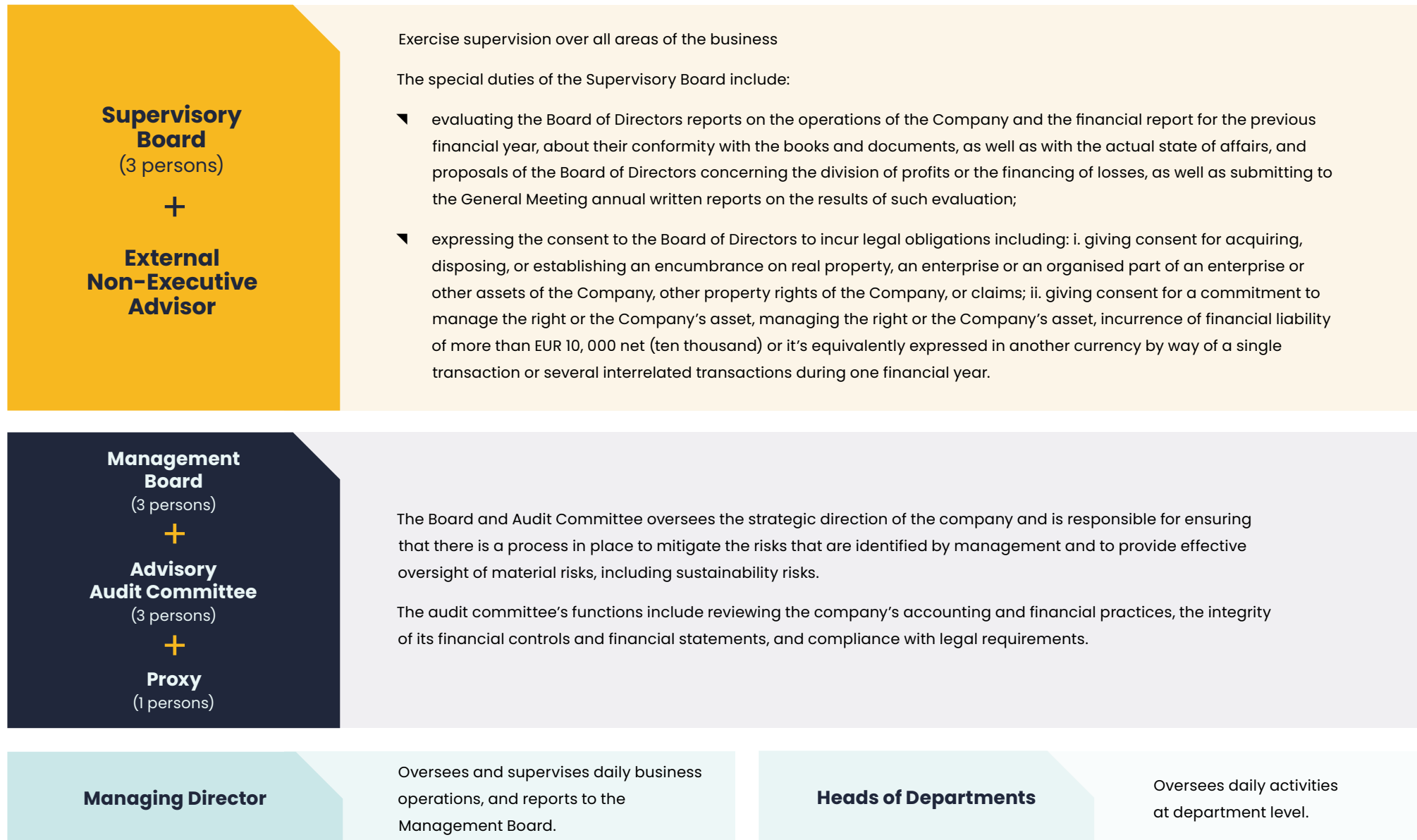
LuNa Smelter Ltd. is unwavering in its commitment to upholding the highest governance standards. We seamlessly integrate sustainability principles into our business practices, emphasising transparency, accountability, and inclusivity. In the year 2023, we introduced two pivotal policies:

- 1. Employee Retention Policy:**
This policy is a strategic framework designed to foster employee satisfaction, professional growth, and long-term commitment within our workforce.
- 2. Environmental Management Policy:**
Tailored specifically for our mining operations, this policy outlines our rigorous approach to environmental stewardship, ensuring responsible practices and minimising our ecological footprint.

Through these initiatives, LuNa Smelter Ltd. continues to pave the way toward a sustainable and ethical future.



As LuNa Smelter is part of the Luma Holding Group, the governance structure will remain structured as per the below information:



Disclosure 2-10

Nomination and selection of the highest governance body

The Supervisory Board consists of 3 members, including the President, who are appointed individually and consecutively for five years by the General Meeting of shareholders as stipulated in the company's Articles of Association.

New President of the Supervisory Board has been appointed since 2023 for the next 5 years.



Disclosure 2-11

Chair of the highest governance body

The Chair of the Supervisory Board was the founder and CEO of LuNa Smelter's major shareholder. In October 2023, a new President of the Supervisory Board was appointed unanimously by Shareholders. The Supervisory Board exercises permanent supervision over all areas of the activities. At the same time, the Management Board has full powers to manage, administer and assist in the company's activities within the limits of the company's objectives. The representation of the company is exercised by two Board Members of the Company acting jointly or by any person nominated by the Company through its Board of Directors.

Disclosure 2-12

Role of the highest governance body in overseeing the management of impacts

Refer to „[Disclosure 2-9](#)“.

Disclosure 2-13

Delegation of responsibility for managing impacts

Critical concerns including concerns about the organisation's potential and actual negative impacts on stakeholders are raised through established grievance mechanisms. To ensure that the highest governance body is aware of raised concerns, the Board delegates a grievance committee which is chaired by a member of the Supervisory Board.

Disclosure 2-14

Role of the highest governance body in sustainability reporting

Material topic and report information in the sustainability report are prepared by the sustainability team and reviewed by a delegated member of the Supervisory Board and a board member for approval.

Disclosure 2-15

Conflicts of interest

As our Code of Business Conduct stipulates, all business decisions are made exclusively in the Company's best interests. All employees and partners of LuNa are expected to avoid conflicts of interest with personal matters or business and non-business activities including those of relatives or other related parties. Any employee is prohibited, directly or indirectly:

- ▼ to have any financial interests that could have a negative impact on the performance of duties or derive any financial benefit from any contract between LuNa and a Third Party where the particular employee is in a position to influence the decisions that are taken regarding that contract;

or

- ▼ attempt to influence LuNa's decision concerning any matter to derive any direct or indirect personal benefit.

LuNa Smelter has also implemented the Limits of Authority in procurement procedures depending on the cost involved.

Disclosure 2-16

Communication of critical concerns

Refer to [Disclosure 2-13](#).



Disclosure 2-17

Collective knowledge of the highest governance body

Supervisory Board Members

Prof. Dr. Radoslaw Miskiewicz

President of the Supervisory Board till October 2023



Prof. Dr. Radoslaw Miskiewicz is the President of the Board of Directors of Luma Holding and the Luma Metallurgical Industry Fund founder. Manager with long-term experience in managing large companies, where he successfully implemented projects regarding assets management, company financing, international transactions, mergers, and acquisitions. Supporter of unconventional solutions in management and sustainable use of natural resources. One of the most essential examples of this activity is a project of a system producing electricity without carbon dioxide

emissions – he invited industry specialists and scientists to participate in this project. His work was awarded many honours, including the prestigious “Environmentally Friendly Company” certificate granted in a competition under the patronage of the President of the Republic of Poland.

Trevor Faber

President of the Supervisory Board since October 2023



Trevor is an internationally experienced mining executive with over 25 years of experience in open pit and underground mining operations, covering both precious and base metals mining. Through his skills and experience, Trevor enhances the technical expertise, operational excellence, and strategic focus of Luma Holding Group. He has an outstanding track record in the tin industry. He has developed the world’s no. 1 tin project the Bisie Tin Project, located in the Democratic Republic of Congo, currently operated

by Alphamin. Trevor oversees strategic planning of the tin assets development of the Group both in Africa and Europe.

Supervisory Board Members

Aleksandra Cholewa-Domanagic

Member of the Supervisory Board



Aleksandra has an extensive career in both private and public sectors, combining expertise in the metals and mining business with high-level experience in foreign policy, international relations, investigative journalism, as well as broader geostrategic and societal trends analysis.

She manages and coordinates the Luma Holding Group global projects run in Central and South-East Europe and East Africa.

Diane Mugisha

Member of the Supervisory Board



Diane, as CEO of Ngali Holdings, is mandated to develop, review, and refine the company's business and investment strategies, and execute them to obtain a leading position in the marketplace and achieve mission.

Diane joins the Ngali team with a strong foundation in corporate governance. Before her appointment as CEO, Diane spearheaded the establishment of all Ngali Holdings wholly owned subsidiaries, ensuring that they are built on solid and effective corporate governance principles.

Board Members

Lukasz Banasik

Chairman and the CEO



Chief Technologist and Head of Metallurgical R&D Department within Luma Holding Group. Lukasz is a global expert in the metallurgy processes of ferroalloys and tin metal.

Co-creator of projects concerning developing

the technology of ultra-low carbon ferrosilicon, ferrosilicon-chromium, and ferrosilicon-aluminium production. He has strong management skills; he has been supervising and implementing several global metallurgical projects in Europe and coordinated the R&D projects run in the metallurgical field.

Marc Nanu

Member of the Management Board till August 2023



Marc has 18 years of experience in international and multicultural environments. His field of expertise covers the management of finance, legal, tax, HR, and IT teams. Marc has a strong operational focus and holds an MBA and master's

degree in Engineering. He has worked in Africa for over ten years, with various companies in leading financial positions.

Katarzyna Janik

Member of the Management Board since August 2023



Katarzyna is a metallurgy and materials science specialist with almost six years of professional experience in extractive metallurgy. She joined the Luma Holding group in 2018, initially working with Re Alloys, as Technology Specialist.

Since 2020 she has been connected with Luna Smelter as Technology Consultant and Proxy of the Management Board. Currently, she holds the position of Technology Project Director for African Projects at Luma Holding.

Katarzyna actively participates in the Luma Holding Group's tin sector, specialising in African project activities. Her involvement contributes to advancing technological solutions and development in the company's tin mining and production field.

Board Members

Aline Mukeshimana

Management Board Member



Aline, Group Head Corporate Services at Ngali Holdings Limited. She joined Ngali Holdings with an extensive experience in corporate matters; she is currently responsible for the delivery of efficient and effective corporate services and leads in setting the right strategies to support the execution of the corporate strategy. With experience in various group operations, Aline understands leadership and business corporate strategy.

Anna Kazibudzka

Proxy of the Board since August 2023



Anna is an experienced financial manager with a 15-year-long track record in developing economic models and strategies. She is responsible for broad financial control, cost optimisation, and company liquidity management within the capital group. Additionally, she has seven years of experience managing a company operating in investment projects realised in mining and metallurgy, in Europe and Africa. A holder of the ACCA certificate.

Other key important people

Joseph Butera

Managing Director of LuNa Smelter



Joseph is experienced in managing mineral resources, mineral supply chains, and due diligence. He is a business-oriented person and focuses on good and quick service delivery. Previously, Joseph spent over six years working for a government agency

responsible for mines as an economist and investment specialist. He holds an MBA in project management from the University of Kigali, a certificate in mineral economics from the University of Johannesburg, and a certificate in mineral resources management and regulation from the University of Sydney.

Mike Loch

Key traceability advisor



Mike is a President of Responsible Trade LLC, located in the Chicago area with over 30 years of industry experience. He founded the Conflict – Free Sourcing Initiative (now the Responsible Minerals Initiative (RMI)). His guidance has resulted

in one of the most successful efforts on the part of the private sector to reduce armed conflict and improve the lives of the population in high-risk areas. Mike is an International Conference on the Great Lakes Region advisor and an expert on conflict minerals at numerous US and EU institutions.



Board Diversity at LuNa Smelter: A Tapestry of Perspectives



At Luna Smelter, we recognise that a diverse Board is a strategic advantage and reflects our commitment to fairness and innovation. Here's how we foster diversity within our Board:

1. Gender Diversity

- ▼ Our Board comprises a harmonious blend of talents, including two accomplished female.
- ▼ Supervisory Board Members and two dynamic female Management Board Members.
- ▼ These women bring unique perspectives, enriching our decision-making processes and ensuring a balanced representation.

2. Skill Diversity:

- ▼ Each member contributes distinct proficiencies in areas ranging from finance and operations to sustainability and governance.
- ▼ This diversity of skills enables us to tackle complex challenges with agility and creativity.

3. Cultural and Regional Diversity:

- ▼ Our Board is an assembly of global minds. Members hail from diverse cultural backgrounds and have extensive international experience.
- ▼ This global outlook allows us to navigate cross-cultural nuances and adapt to the ever-evolving global landscape.

4. Industry Experience:

- ▼ Our Board includes veterans from various industries, including mining, finance, and technology.
- ▼ Their collective wisdom ensures that our strategies align with industry best practices while fostering innovation.

5. Inclusive Decision-Making:

- ▼ We actively encourage open dialogue and constructive dissent during Board meetings.
- ▼ Diverse viewpoints lead to robust discussions, resulting in well-informed decisions.

6. Succession Planning:

- ▼ Our commitment to diversity extends to succession planning. We identify and nurture potential Board members from diverse backgrounds.
- ▼ This ensures continuity and fresh perspectives as we evolve.

7. Championing Diversity Beyond the Boardroom:

- ▼ Luna Smelter's commitment to diversity transcends Board meetings. We advocate for diversity at all organisational levels.
- ▼ Our policies promote equal opportunities, fair compensation, and a respectful work environment.

In summary, our Board is a mosaic of talents united by a shared vision: to drive sustainable growth while embracing the richness of diversity.

Stakeholders engagement

LuNa Smelter executives regularly meet with stakeholders, including shareholders, clients and partners, employees, regulators, community members, non-governmental organisations (NGOs), associations and others, to engage in open dialogue and assimilate feedback into strategic planning, business decisions, and reporting frameworks. A key part of our Community relations' commitment is listening closely to each group and engaging with and understanding the issues that are important to them so that we can build the most robust relationships over the long term.



Examples include



Employees

Daily management meeting, communications through email, Luma Holding internal collaboration network and annual workers gathering



Suppliers

Regular meetings and reviews, sharing best practices in responsible supply chain management



Civil Society, and NGOs

Community engagement programmes; pro-bono skills giving; diversity initiatives; and support programmes



Government and Other Industry-related Bodies

Regular dialogue, face-to-face meetings, leadership groups, and roundtable discussions on issues of societal and environmental impact

Some of the major stakeholder engagement activities carried in 2023



In January, LuNa Smelter had the pleasure of hosting the president and founding members of the Rwanda Women in Mining Association (RWIMA). We discussed areas of collaboration to promote gender equality in the mining sector.



On 26th–27th June, the first-ever EU-Rwanda Business Forum was held in Kigali, which gathered about 120 European companies interested in investing in Rwanda. The forum has been a knowledge exchange hub, fostering European trade and investment in Rwanda. LuNa Smelter's

team actively participated in various panels, providing valuable insights into the mining sector and highlighting Rwanda's advantages as a regional economic hub. Ms. Katarzyna Janik, shared invaluable experiences of our parent company, Luma Holding, as a leading investor in Rwanda's mining industry. We discussed the factors influencing our decision to invest in the country's mining sector, emphasising the favourable business environment and transparent policies that have facilitated our success. Furthermore, we explored the current opportunities and challenges we face as a prominent mining company in Rwanda. Our Managing Director, Joseph Butera, shed light on our endeavours to add value to the mining sector and establish robust value chains, contributing to the country's economic growth and development.



From the 24th to the 28th of April in Paris, Aleksandra Cholewa-Domanagić, a Supervisory Board Member of Luna Smelter, actively engaged in the OECD Forum on Responsible Mineral Supply Chain. The event facilitated meaningful debates, discussions, and the exchange of constructive

ideas. This occasion provided a valuable opportunity to personally connect with colleagues from the European Partnership for Responsible Minerals (EPRM) and key stakeholders of LuNa Smelter Ltd. The forum served as a platform for discussions pertaining to the practical aspects of modern and transparent due diligence within the mineral supply chain.



On the 19th of July, LuNa Smelter had the honour of hosting the representatives of the Polish Ministry of Finance, the delegation headed by Magdalena Rzeczkowska – Polish Minister of Finance.

LuNa Smelter executives Trevor Faber, Łukasz Banasik, and Joseph Butera, presented

the production potential of the company and the plans for further development of the added value generation in East Africa, which represents one of the main pillars of the Luma Holding Green Tin Project. Metallurgical knowledge transfer, organised from the Polish assets of Luma Holding Ltd, Re Alloys, to LuNa Smelter, has been an essential factor in the Kigali-based smelter development and production success.

Some of the major stakeholder engagement activities carried in 2023



On 7th of November LuNa Smelter and Luma Holding, represented by Aleksandra Cholewa, participated in the 19th Annual General Meeting (AGM) at the Palais des Nations in Geneva as a part of LuNa Smelter's engagement in the European Partnership for Responsible Minerals (EPRM).



On 20th December LuNa hosted the EU delegation, Mark Robinson, Executive Director of the EITI, and Cecile Billaux, Head of Unit Trade. Together with LuNa's representatives, they discussed the matters of traceability systems, cooperation on the Critical Raw Materials, and challenges in securing funds

related to the CRM value chain improvement. The entire group, at the invitation of Belen Calvo Uyerra, EU Ambassador in Rwanda, and Yamina Karitanyi, CEO of RMB, joined the hosts at the round-table discussion concerning strategic cooperation on the Critical Raw Materials between the EU and Rwanda. Katarzyna Janik, LuNa's Board Member, had the opportunity to present the private sector's point of view on the integration and value chain of Critical Raw Materials and the challenges the private sector faces in this regard. These consultations of the EU and the private sector representatives, with the participation of the EITI and the EIB, gave a clearer picture of the possibilities of changes, funds, and development in the field of the CRM value chain.



From 4th to 6th December 2023, Rwanda Mines, Petroleum and Gas Board, in partnership with Rwanda Mining Association and the University of Rwanda, organised the 6th Edition of Rwanda Mining Under the theme: **"Embracing Technology, Investment and Responsible Mining"**.

Joseph Butera, Managing Director, Ngaboyisonga Serge, Production Manager and Duduzani Mgezelwa, Mine Operations Manager, had an opportunity to attend the meeting and discussions. As a part of the metallurgical and mining industry in Central and East Africa, LuNaLuna has contributed to shaping the development of Rwanda and the entire region. During the second panel of the first day, "Mineral processing and value addition", Joseph Butera discussed the mineral value addition impact on the country's structural transformation and economic growth.

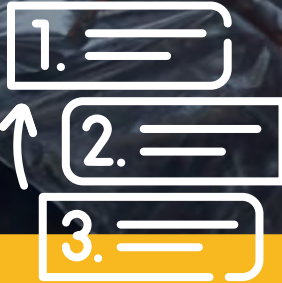


Aleksandra Cholewa-Domanagić, Luna Smelter Supervisory Board Member, participated in EIT Raw Materials Expert Forum in Prague. During this prestigious event, LuNa Smelter Ltd, in collaboration with Minespider, presented advanced blockchain tools designed for digital mineral traceability,

showcasing their successful implementation within the AGLR.

GRI 3

Material Topics

- 
1. —
 2. —
 3. —



Please **follow the link** to read more
about management
of LuNa Smelter material topics.

<https://lunasmelter.com/2023-05-10-materiality-analysis-luna-smelter/>

GRI 200

Economic
Topics



Disclosure 201-1

Direct economic value generated and distributed



LuNa Smelter is a key player in the mining sector in Rwanda as the only tin smelter in the country, the company significantly contributes to the development of the Rwandan economy.

Since its beginning, LuNa Smelter has been a regular taxpayer contributing to the Rwandan budget. On regular operating costs, excluding costs of raw materials, in 2023, LuNa spent USD 473 590, and the annual payroll and employee benefits were USD 711 542. Additionally annual energy cost was USD 148 770;

LuNa Smelter also donated USD 4 345 to genocide survivors and mutuelle de sante for the Rugarama sector–Gatsibo and to the Kigali Genocide Memorial Centre. It also supported the Afriquia Foundation in coordinating its activities in Rwanda through its employees, who continually provided in-kind support related to logistics, transport, and consultations; the estimated amount equals USD 2 550.

Other details in [„GRI 203 Significant indirect economic impacts“](#)



Disclosure 201-2

Financial implications and other risks and opportunities due to climate change



LuNa Smelter analyses and manages risks associated with climate change in the same way we handle any other business risk: through our risk management procedure. The risk management activities facilitate the identification of risks, issues and opportunities throughout the business. We capture such risks, assess them against applicable criteria, escalate them appropriately, and manage them to enable coordinated action.

We prioritise risks and opportunities according to their probability of occurrence and potential impact. Based on this assessment, we have found no substantive risks associated with climate change; further details on our environmental performance will be reported in the environmental topic section.



Disclosure 201-3

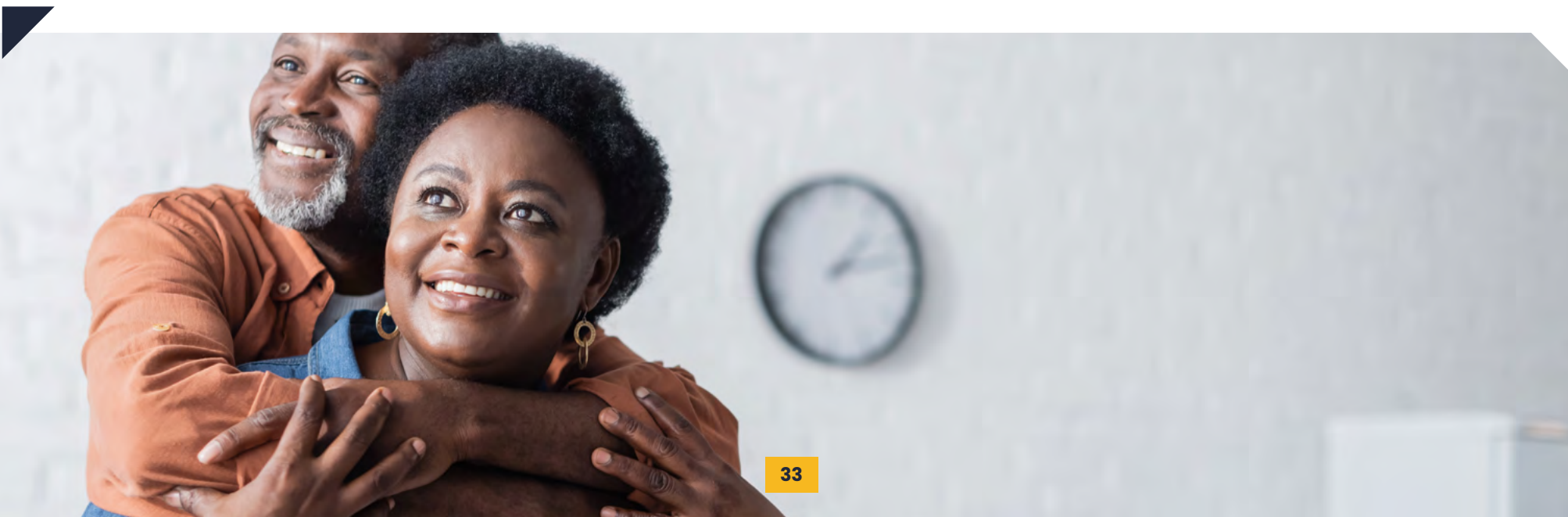
Defined benefit plan obligations and other retirement plans

LuNa Smelter follows Rwandan regulations on the retirement of its employees as per art. 32 of the labour law, like in most countries, Rwanda also has a governmental body in charge of social security services known as the Rwanda Social Security Board (RSSB). Early retirement age for salaried workers, including foreigners, as determined by RSSB is 60 and late retirement age – 65. Workers who have been contributing to the RSSB pension are eligible to access their pension at 6. 30% of the insured's average monthly earnings in the last five years and an additional 2% of average monthly earnings every 12 months of contributions exceeding 180 months is the benefit paid for Old-age and Permanent Disability Pensions. Additionally, a 100% lump sum (for old-age settlement only) of the insured average monthly earnings in the last five years is multiplied by the number of years.

Disclosure 201-4

Financial assistance received from government

LuNa Smelter holds a Quitus Fiscal certificate. This certificate is given to taxpayers in Rwanda who have demonstrated a history of correct tax compliance. The benefit of Quitus Fiscal is that certified taxpayers are not required to pay a withholding tax of 5% on imports and for withholding tax of 3% on public tenders, the former being applicable in LuNa's case.



Disclosure 202-1

Ratios of standard entry level wage by gender compared to local minimum wage

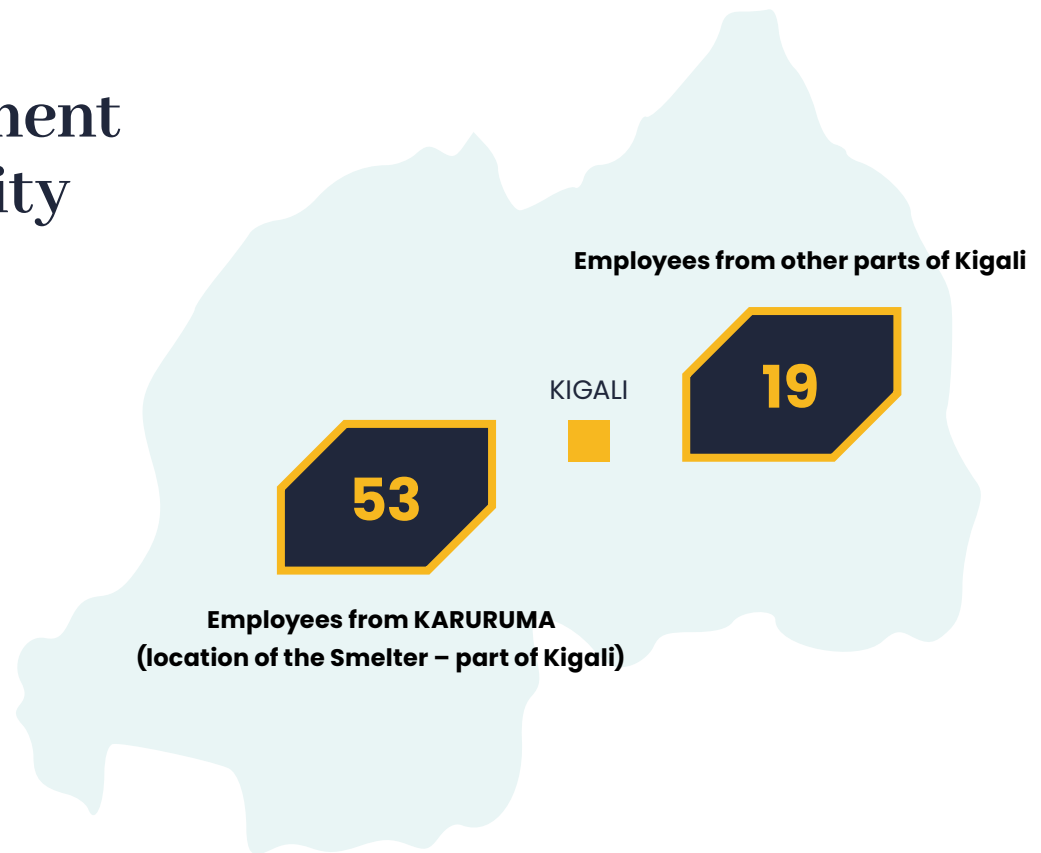


LuNa Smelter does not use a living wage methodology to assess the wage level of employees.

Disclosure 202-2

Proportion of senior management hired from the local community

All employees at LuNa Smelter are Rwandan Nationals, **except for one expatriate**. The company is also a key employer in the municipality cell, where about 75% of all employees at the smelter are from the cell where the company is located, namely: Karuruma.



Partnership with the University of Rwanda

One of our human resources development strategies is to capture and transfer knowledge and skills effectively to ensure succession management and operational excellence. In 2021, LuNa Smelter signed an MoU with the University of Rwanda to support academia bridging the skills gap between what is taught at university and the skills required in industries.

In 2023, LuNa Smelter welcomed ten interns from the university in the Quality Control and Production departments, five men and five women.

Construction of a modern market for local women in the Jabana Sector

The company has started a project of constructing a modern market for local women in the Jabana Sector where the smelter is located. This is to improve the women’s well-being and we have already committed to provide a land where the market will be built, valued at approximately **RWF 43 million**.

The company is reviewing the architectural designs of the market and is ready to start on the initial phases of acquiring construction permits from the relevant authority.



Other annual subscription and membership contributions to community-related organisations includes

Rwanda Mining Association	USD 1 000
Private Sector Federation	USD 1 000
European Partnership for Responsible Minerals	USD 500
European Business Chamber of Rwanda	USD 500
ITSCI	USD 5 000

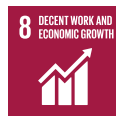
Procurement Practices

LuNa Smelter is committed to responsible business practices and sustainable procurement. The company is aware of the potential risks associated with operating in the Conflict Affected High-Risk Areas (CAHRA) of the Great Lakes Region and takes steps to ensure that its suppliers meet strict standards. This includes complying with the Responsible Minerals Initiative (RMI) audit and the Responsible Minerals Assurance Process (RMAP) regulations, and collecting Know Your Counterparty (KYC) forms for all other suppliers, to ensure they share a commitment to sustainability in line with LuNa’s supply chain policy. LuNa is the only conformant tin smelter in the region, as assessed by RMI audit, and the company is dedicated to building and sustaining supplier relationships that reflect its core values of inclusion and diversity, human rights, health and safety, and environmental sustainability.

In order to achieve these goals, LuNa has revised and integrated social and environmental criteria in its supplier inspection form. The company expects its suppliers to meet high standards when it comes to screening for abuses, including slavery and child labor, as well as complying with environmental regulations and industry best practices. LuNa’s supply chain management system helps ensure that its suppliers contribute to the company’s responsible business practices. By prioritizing sustainability and ethical sourcing, LuNa Smelter is setting an example for other businesses in the region and demonstrating its commitment to building a more responsible and sustainable supply chain.

Disclosure 204-1

Proportion of spending on local suppliers

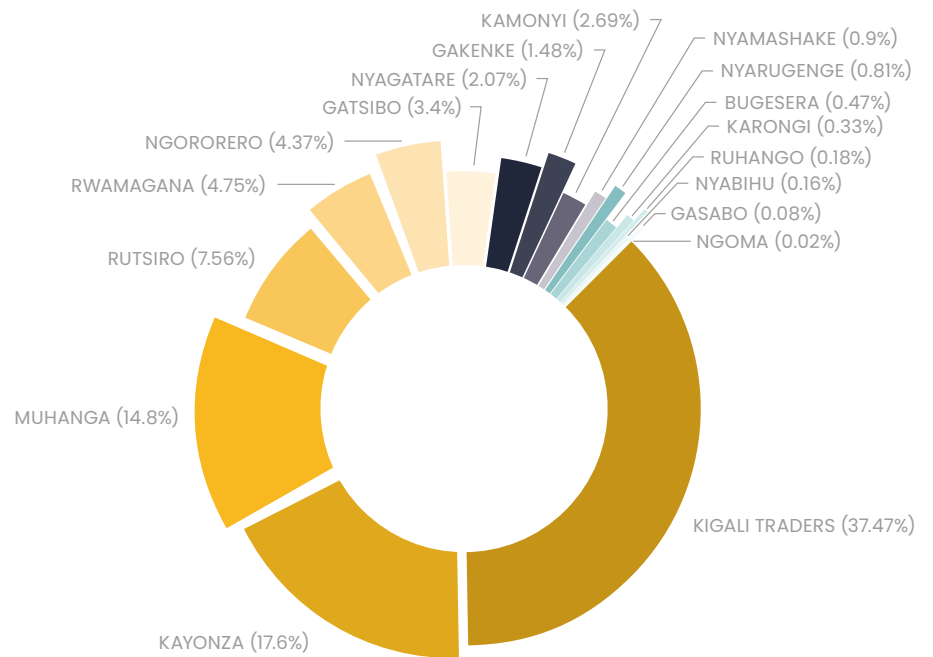


Over 77% of the total suppliers at the smelter are businesses registered and operating in Rwanda.

In the period of January up to December 2023; LuNa received 1214 tonnes of Cassiterite from 60 companies (including 1 from DRC);

- 1,053 tonnes of the volumes from Rwanda which represents (86.7%)
- 161 tonnes of the volumes from DRC which represents (13.3%)

Source of Cassiterite in Rwanda



Disclosure 205-1

Operations assessed for risks related to corruption

LuNa Smelter Code of Business Conduct and our core values within the Luma Group require LuNa Smelter Directors, senior management, and employees to disclose all known, apparent or potential conflicts of interest to LuNa Smelter as they arise. The code of business conduct stipulates that LuNa has zero tolerance for unfair business practices, including bribery, kickback or insurance rebating.

All LuNa Smelter operations are assessed for risks, including corruption-related ones.



Disclosure 205-2

Communication and training about anti-corruption policies and procedures

The Code of Business Conduct Policy is available on LuNa Smelter's website, and whenever a change is made, all employees are emailed to be informed.



Disclosure 205-3

Confirmed incidents of corruption and actions taken

In 2023, there were **no cases of corruption** at LuNa Smelter.



Disclosure 206-1

Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices



Number of legal actions pending or completed during the reporting period regarding anti-competitive behaviour and violations of anti-trust and monopoly

NONE



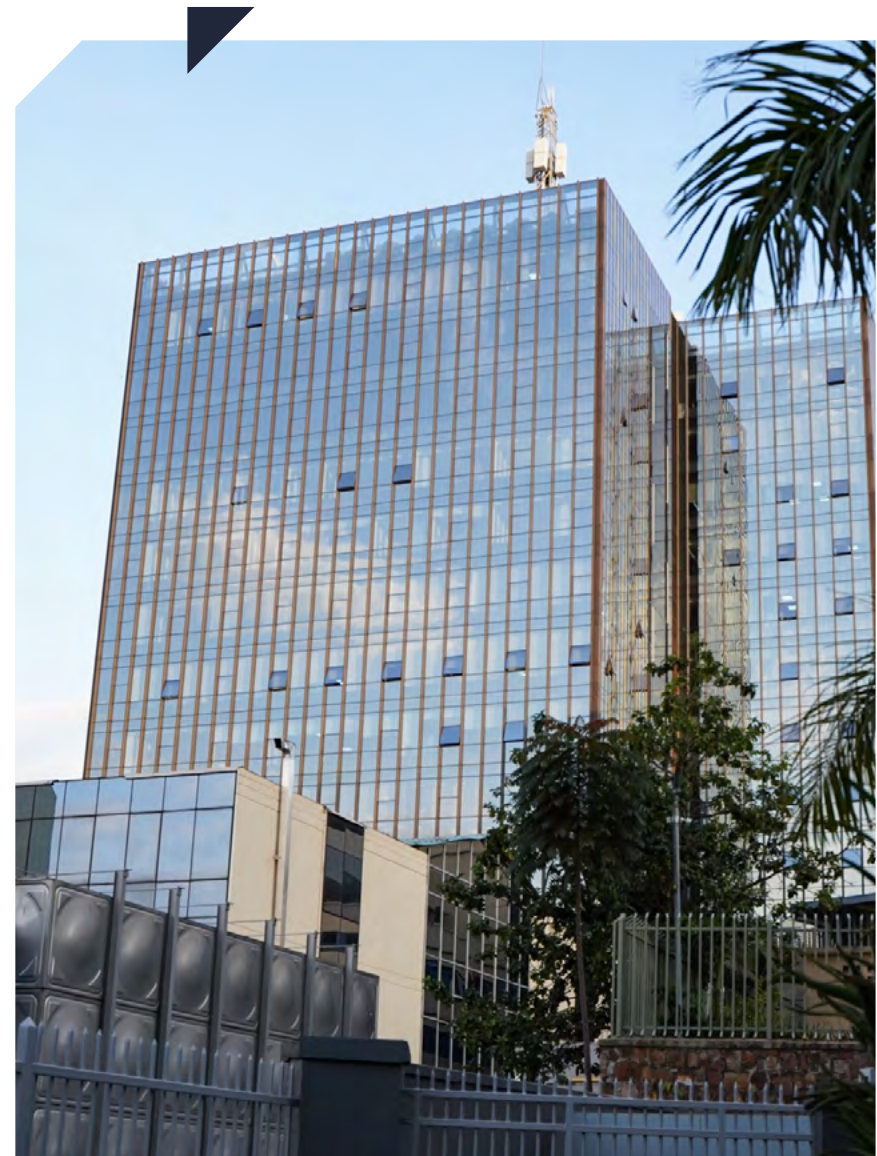
Disclosure 207-1

Management approach towards taxes

Our approach to tax seeks to balance the interests of all our stakeholders, including shareholders, government, colleagues, and communities in which LuNa Smelter Ltd operates.

LuNa Smelter takes a principled and low-risk approach. We commit to paying our taxes in full and on time, in compliance with Rwanda's tax law and managing tax responsibly to optimise shareholder returns. Paying tax is an integral part of our commitment to the societies in which we operate. Taxes help governments provide vital services and infrastructure, which we, in turn, rely on to run our business successfully. A fair and effective tax system is in the interests of tax-payers and society. Our approach to managing our tax affairs is:

- ▼ to make transparent tax disclosures that meet all regulatory requirements and reflect best practice
- ▼ to comply with and follow the spirit of the tax Law of Rwanda
- ▼ to engage constructively and openly with local and national tax authorities
- ▼ to pay our taxes in the jurisdictions where our revenue-generating activities take place and not to transfer profits
- ▼ to use tax incentives and exemptions only where appropriate and to only engage in reasonable tax planning that is aligned with our commercial and economic activities.



Disclosure 207-2

Tax Governance, Control, and Risk management



The Audit Committee: LuNa Smelter's Audit Committee is responsible for the Tax Policy and ensuring our principles and approach are followed. The Tax Policy is approved by the Audit Committee annually.

Tax Accountant: The Tax Accountant manages the tax function. This team is in close contact with the finance and accounting departments.

The Tax policy is provided to all LuNa Smelter Colleagues, and more detailed guidance is given to those working in Finance roles that directly connect with tax matters.

Specific training on tax law is additionally provided to relevant colleagues.

We take a low-risk approach to tax planning and adopt a consistent, standardised approach to intercompany transactions using the arm's length principle in line with Rwanda Revenue Authority guidelines. This approach limits the likelihood of disputes with tax authorities and reduces the risk of unexpected tax liabilities.

Tax risks can also arise from ongoing business activity. We operate a regular risk review process to identify if our business activity is giving rise to tax risk and how it can be remedied.

When the interpretation of the law is uncertain, we seek to discuss the issue with the Rwanda Revenue Authority.

Disclosure 207-3

Stakeholder engagement and management of concerns related to tax



STAKEHOLDER ENGAGEMENT

We conduct surveys and several meetings with our stakeholders, which help us understand their needs and expectations and facilitate our implementation planning for various tasks involving them.

MANAGEMENT OF CONCERNS RELATED TO TAX

Tax risk management is part of LuNa Smelter's overall business strategy, which aims to avoid unnecessary tax costs while ensuring sound compliance with laws and regulations.

LuNa Smelter management ensures that any tax concern raised is analysed and addressed correctly. Whenever necessary, external tax advice is sought on matters of uncertainty when more than in-house resources are needed. This can occur when we need to gain relevant experience in the tax issues or the jurisdiction involved.



GRI 300

Environmental
Topics



Management approach disclosures for energy

LuNa Smelter recognises the contribution of energy consumption from non-renewable sources to climate change. We align our approach to ISO 50001 on energy management and have significantly improved energy consumption over the past three years.

The factory has two main electrical supplies: a Public Utility supply and a Standby Generator supply.

The incoming feeder supplying the factory from the public utility company is a 15KV line; a step-down transformer of 1250KVA converts this medium voltage into a low voltage of 380V. The same 15KV line is connected to the primary side of the 500 KVA furnace transformers.

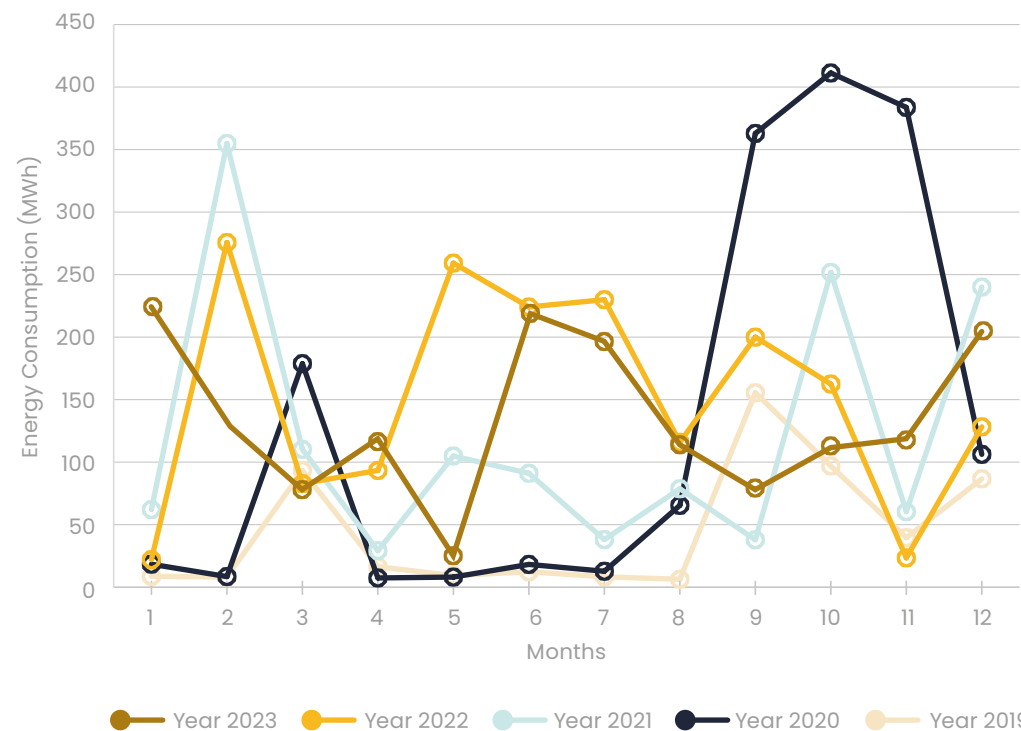
To overcome the challenges of power interruption, the factory has two standby generators:

1. 40 KVA generators supply the administration block, public light, production and warehouse light, and another small load in the factory. This generator has an automatic transfer switch.
2. A 1.1MVA generator supplies the whole factory. Due to the factory’s design, this generator is manually connected to the system.

In March 2019, the first smelting period, LuNa Smelter’s energy consumption was high mainly due to a lack of strategic plan for turning on or off different electrical equipment, the company’s use of old equipment, and a lack of automation systems, mainly for electrical water pumps.

To date, the company has now created an automation system for water pumps and cooling towers. It also regularly maintains electrical machines and has replaced incandescent lamps with LED lamps as solutions to reduce energy consumption.

Four Years Energy Consumption



Disclosure 302-1

Energy consumption within the organisation



- a. Total FY23 fuel consumption within LuNa Smelter organisation from non-renewable sources, in joules or multiples, and including fuel types used: natural gas, oil, LPG (averaged based on consumed)

26 317 025.28 kJ (for LPG)

- b. Total FY23 fuel consumption within LuNa Smelter organisation from renewable sources, in joules or multiples, and including fuel types used:

Not Applicable

- c. In joules, watt/hr or multiples, the total:

- ▼ Electricity consumption: **1,618,920 kWh**
- ▼ Heating consumption: n/a
- ▼ Cooling consumption: n/a
- ▼ Steam consumption: n/a

- d. In joules, watt-hours or multiples, the total:

- ▼ Electricity sold: n/a
- ▼ Heating sold: n/a
- ▼ Cooling sold: n/a
- ▼ Steam sold: n/a

- e. Total energy consumption within the organization, in joules or multiples.

1,618,920 kWh

- f. Standards, methodologies, assumptions, and/or calculation tools used.

- g. The data presented is based on meter readings, actual bills, and supply logs wherever possible. We estimate if these are unavailable based on the most recent figures.

Disclosure 302-2

Energy consumption outside the organisation

LuNa Smelter does not report its energy consumption outside of the organisation.

Disclosure 302-3

Energy intensity



In 2023, the annual energy consumption per one tonne of cassiterite smelted, was significantly reduced compared to the four previous years, as shown in the table below. Proper and regular maintenance of machines was established, and breakdown time was significantly reduced.

The production capacity significantly increased from 2019 to 2023. However, the efficiency of the production process and proper and regular maintenance of the facility significantly decreased the indicator of Annual energy Consumption per Tonne of tin produced (kWh/T).

Energy vs production capacity

Year	Cassiterite Smelted (T)	Tin Produced (T)	Energy Consumed (kWh)	Annual Energy consumption per Ton of Tin Produced (kWh/T)
2019	216.25	91.99	541 316	5 884.50
2020	943.55	546.52	1 581 551	2 895.00
2021	542.84	394.921	1 459 140	3 694.70
2022	992.75	643.028	1 817 095	2 825.84
2023	1 255.37	781.78	1 618 920	2 070.81

Disclosure 302-4

Reduction of energy consumption



Reducing power consumption is essential to benefiting industrial processes. Studies estimate energy reduction is achieved by incorporating efficiency technologies and practices such as proper machine design, usage, and regular maintenance. In 2023, energy reduction per tonne of tin produced decreased by 44% compared to 2021, as shown in table.

Specific strategies used at LuNa Smelter are highlighted as follows:

- ✦ use of good electrical machine design (modern electrical equipment),
- ✦ regular maintenance of electrical machines,
- ✦ turn off or disconnect unnecessary machines for a specific time during the day,
- ✦ install an automated system in different electrical systems of the factory where necessary,
- ✦ establish a daily energy usage record and set energy management strategies,
- ✦ establish a maintenance equipment breakdown record.

Disclosure 302-5

Reduction in energy requirements of products or services

Not applicable.

Percentage of energy reduction per ton of tin produced

Description	YEAR		
	2023	2022	2021
Total Energy (kWh)	1 618 920	1 817 095	1 459 140
Tin Produced (Tonnes)	781.78	643.03	394.92
Energy Consumed / Ton of Tin produced (kWh/T)	2 070.81	2 825.84	3 694.76
% of Energy Reduction per tonne of Tin produced	44%	24%	0%

Management approach disclosures for Water

LuNa Smelter utilises two water sources supplying the production and administration zones that are:

1. Natural Underground water source
2. Water Supplied by Water Sanitation Corporation (WASAC) is the entity set up to manage Rwanda’s water and sanitation services.

From 2019 to the end of 2023, LuNa was only used natural underground water in different production, laboratory and administration sections. During the maintenance time of the factory water supply system, highlighted sections were affected by water shortage, causing some disturbance in the factory processes. To overcome this challenge, toward the end of 2023, the company installed a backup water system supplied by WASAC Ltd. For some laboratory activities, a deionised water purifier was also installed.

The company, based in Rwanda, is located in a low water-stressed area, per the Water Risk Filter report. Due to that, and the fact that LuNa Smelter’s water source is a natural underground source, the company is not exposed to water risk.

With a closed water circulating system, no significant water wastage occurs in the production area. Water is discharged only during the cleaning process of the water tank, which happens a few times a year.

Water metres have been installed on the main pipes supplying the production and administration zones to monitor water use in different factory sections.

N/S	Location	Water quantity (cubic metre)
1	Production zone	668.64
2	Administration block	294.31

Water Supplied by WASAC Ltd Records

The average water quantity usage from WASAC on a monthly basis is 20 cubic meters.

Disclosure 303-1

Interactions with Water as a Shared Resource

As part of the company’s community outreach activities, the infrastructure set up to serve water from the source to the company serves not only LuNa Smelter but also the community surrounding its operation, where about 1000 people near our operations use the same water.



Disclosure 303-2

Management of Water Discharge Related Impacts

Not applicable.

Disclosure 303-3

Water Withdrawal



Total water withdrawal from all areas in megalitres, and a breakdown of this total by the following sources, if applicable:

1. Surface water: **0**
2. Groundwater: **962.95 cubic metres**
3. Seawater: **0**
4. Produced water: **0**
5. Third-party water: **20 cubic metres (water supplied by WASAC)**



Disclosure 303-4

Water Discharge



Water discharged to sewerage network.

Total water discharge from all areas in megalitres, and a breakdown of this total by the following sources, if applicable:

1. Surface water: **0**
2. Groundwater: **0**
 - ▼ **982.95 Cubic Meters**
from the production and administration zone discharged to sewerage network.
 - ▼ **0.2 Cubic Meters**
from the Lab discharged to a third party (200 l from the laboratory).
3. Seawater: **0**
4. Produced water: **0**
5. Third-party water: **0**

Disclosure 303-5

Water Consumption



- ▼ Total water consumption from all areas in megalitres: **982.95 cubic metres**
- ▼ Total water consumption from all areas with water stress in megalitres: **not applicable**
- ▼ Change in water storage in megalitres, if water storage has been identified as having a significant water-related impact: **not applicable**

Disclosure 304-1

Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas

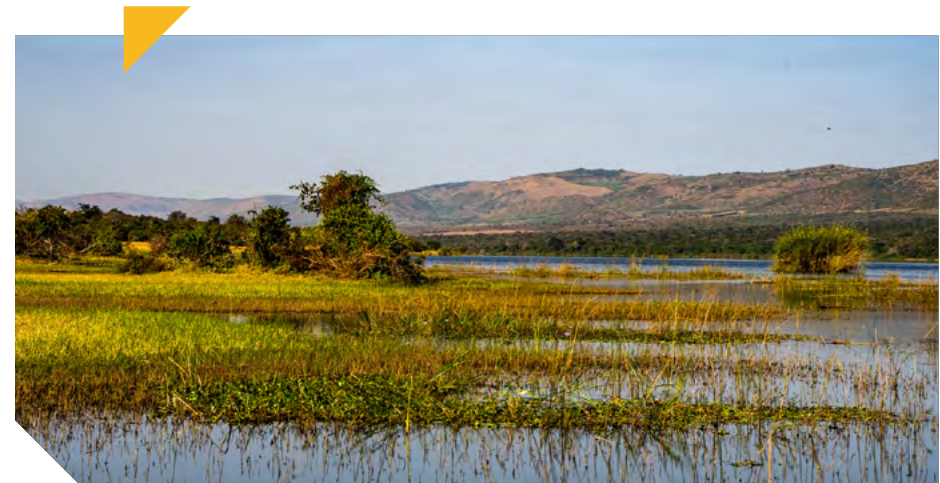
None

Disclosure 304-2

Impacts of activities, products and services on Biodiversity

LuNa Smelter's management oversees the surrounding environment and the surrounding biodiversity. The kind of generated waste and the wastewater source are considered to avoid pollution from our activities. The system is a closed-circuit system and prevents wastewater from reaching the surrounding environment. The LuNa mining started in 2023, and there is a strong commitment toward biodiversity protection and

conservation, as stated in the Mining environmental policy. The Environmental impact assessment done before starting mining activities elaborates more on the actions and plan to preserve the biodiversity. The mine site assessment was done for our supplier's evaluation of the role and responsibility of miners towards the biodiversity in the area where they operate.



LuNa Smelter recognises that its activities can contribute to air pollution. Because of this, the company monitors its emissions into the atmosphere.

In 2023, LuNa Smelter appointed Estonteco Brila Ltd. as a consultant to measure, quantify, and verify the measured air pollutant and noise pollution compliance. The report used the maximum recommended limit levels specified by RS EAS 751: 2010 standard for both ambient and point sources of air pollutants and RS236 2014 standard by Rwanda Standard Board for acoustic noise pollution level tolerance limits to assess the compliance of emissions from LuNa Smelter factory activities.

Disclosure 305-1

Direct Scope 1



Direct GHG emissions in metrics tonnes: CO2 emissions: 786,975 t

Standard, methodologies, assumptions, and calculation tools are used to measure the above. GHG calculation is based on carbon content entering the process of tin smelting in each main component of the process – including raw materials, fuels, and consumables (input) – and carbon content on the output in products/ by-products. The difference in input-output is converted to the oxide form and considered as – GHG emission – this method is called the mass balance methodology or standard methodology used to determine GHG. It's consistent with Commission Implementing Regulation (EU) No 2018/2067 of 19 December 2018 on the verification of data and on the accreditation of verifiers according to Directive 2003/87/EC of the European Parliament and of the Council.

Disclosure 305-2

Energy indirect (Scope 2) GHG emissions



Gross energy indirect (scope 2) GHG emissions in metrics tonnes of CO2 (if available the gases included in the calculation) – **Scope 1 only.**

Disclosure 305-3

Scope 3

LuNa Smelter currently does not measure scope 3.

Disclosure 305-4

GHG emission intensity



Numerator and denominator with their respective units	Unit	2023
Absolute energy consumption (numerator): emissions from operations	T of CO ₂ e	786.975
Organization specific metric (denominator): tin produced	T (tons)	781.78
GHG emissions intensity	T of CO ₂ e / T of tin	1.007

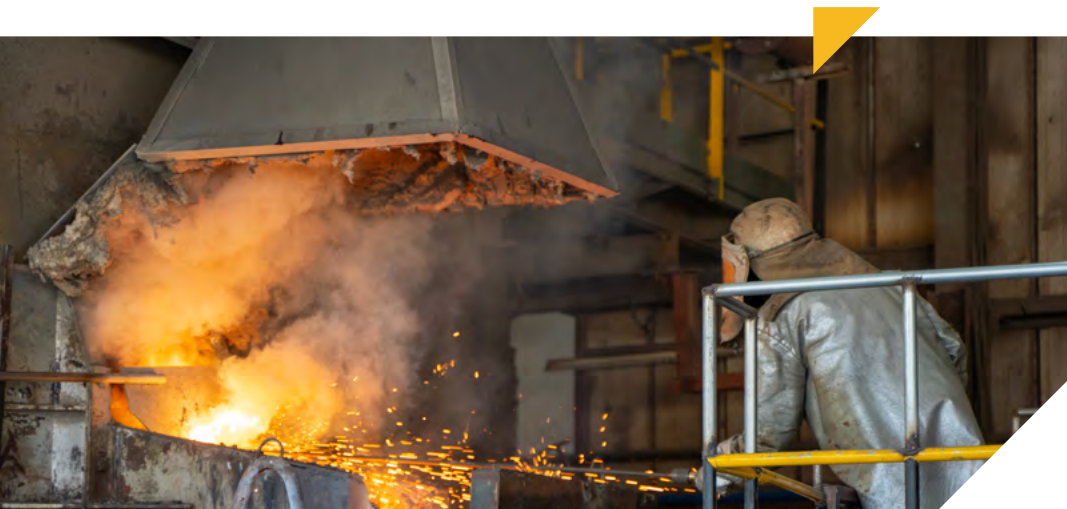
Disclosure 305-5

Reduction of GHG emissions



LuNa took the problem of GHG emission seriously and put effort into reducing it.

- ▼ In 2023, the technology team worked on reducing energy consumption per mt of product, successfully achieved by changing the charge mix composition and stabilising the process. These actions have both economic and environmental impacts.
- ▼ In 2023, the furnace hood was efficiently used after repair, which reduced dust loss during the process and allowed the collect more of the gases that occurred during the tapping.
- ▼ The fume extraction system was rechecked (leak checking, turbo filters, pipes). No irregularities were found. Installation checks are performed annually as maintenance of the extraction system.
- ▼ In 2024, during external environmental check-ups, GHG emissions will be measured to determine if low emissions have been maintained.

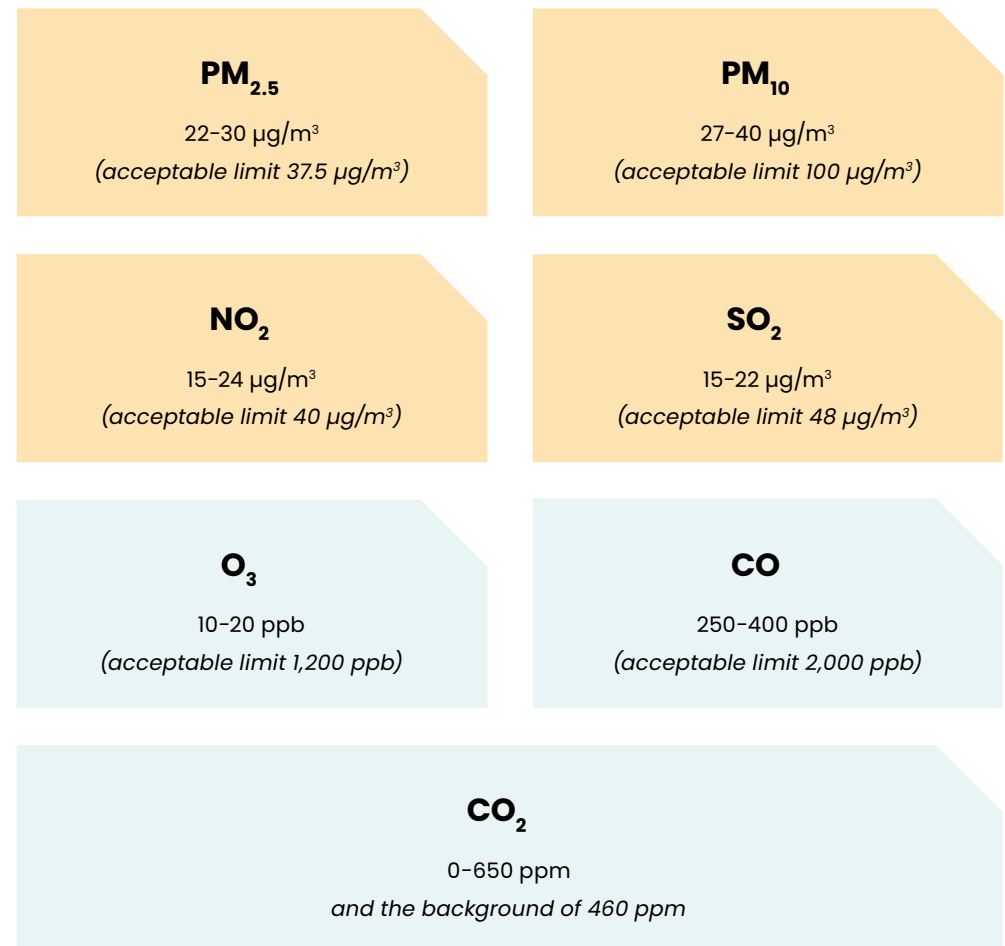


Disclosure 305-6

NOx, Sox and other air emission



Significant air emissions reported in kg or any other measurement selected



Management approach

LuNa Smelter Ltd has a duty of care to ensure that all of its waste is managed legally and that spills and other avoidable pollution are prevented under the Rwanda Law N°48/2018 of 13/08/2018 on the environment, we have identified our waste, including its sources, and determined its storage and treatment as per the procedure on waste management. There are three main wastes destination, some waste is recycled/re-used; waste carriers take others to landfill collection for separation; wastewater from the lab is treated separately as the only hazardous waste produced by the company.

Waste segregation at the point of generation enables the safe management of wastes. We have established a management mechanism to ensure that our activities do not pose a risk to anyone else coming into contact with the waste containers.

We have designated specific waste bins that have labels of the kind of waste to be collected.



These waste bins include the following:

Label on the waste contain	Type of waste to be collected in the bin
Baghouse dust	Baghouse dust to be recycled
Slag	Slag to be recycled
Plastics, polyethene, card boards, paper	Plastics, polyethene, card boards & paper generated from production and offices
Food waste	Food remains
Hazardous waste	Dangerous substances such as chemical, detergents, flammable items, etc.
E-Waste	Waste from electronics such as batteries, CD's, Flash discs, ink / toner cartridges, cables, bulbs, etc.



Management of hazardous waste

Hazardous waste at LuNa refers to wastewater from the laboratory. It is generated from the sample preparation process before the analysis. The volume of water generated is around 2 to 5 litres per day.

Wastewater produced in 2023 was 295 litres.

Hazardous wastewater is stored in enclosed containers. To prevent pollution of the water source, chemicals or wastewater containing chemicals are forbidden from being poured into the drainage. A qualified and licensed contractor is employed to dispose of the company's wastes, including hazardous wastes.

LuNa contacted USE ME SOLUTIONS Ltd, a professional company in wastewater management, to propose a way to neutralise our hazardous wastewater before giving it to the waste carrier; the chemical analysis showed that some parameters are above acceptable limits according to Rwanda's national standard on industrial wastewater discharge (RS 109:2022, third edition). A proposed recommendation for the treatment of elements above acceptable limits was provided in the recommendation of the report dated 31st October 2023. The implementation is to be done in the year 2024.



Environmental compliance



LuNa Smelter strives to comply with relevant environmental laws and regulations. In 2023, the company did not identify any non-compliance with environmental laws and regulations.



LuNa Smelter is aware of the business sector in which it operates. The company has an internal procurement policy, and due to RMAP regulations, all suppliers of the primary raw material, cassiterite, must be checked, especially since LuNa is located in the CAHRA region (Conflict Affected High-Risk Areas). To date, LuNa is the only conformant tin smelter in the Great Lakes Region, assessed by the RMI audit. Additionally, LuNa now collects the KYC “Know your Counterparty” form from all other suppliers, a process which is ongoing.

We seek to build and sustain supplier relationships that reflects our core values of inclusion and diversity, human rights, health and safety, and environmental sustainability. Our supply chain management helps ensure that our suppliers contribute to LuNa’s responsible business practices in areas such as screening for human rights abuses, including slavery and child labour, and complying with environmental regulations, health and safety, and industry best practices.

LuNa Smelter has revised and integrated social and environmental criteria in its supplier inspection form and expects suppliers to share a commitment to sustainability in line with its supply chain policy.

Disclosure 308-1

New suppliers that were screened using environmental criteria

In 2023, the Due Diligence team at LuNa Smelter amended the mine site inspection form to include environmental and social criteria. All our suppliers of cassiterite were screened and, upon completion of the survey, any potential risks were identified, based on our review of the suppliers’ responses.

Disclosure 308-2

Negative environmental impacts in the supply chain

Although detailed information is confidential, we can confirm that as standard practice, supplier-related environmental improvement actions are passed on the LuNa Smelter’s due diligence team to pursue as part of day-to-day working practice with suppliers. Issues are to be assessed by both parties and closed within an agreed-upon timeline.



GRI 400

Social
Topics



Management Approach disclosures



Attracting and retaining top talent is critical to our success in this rare space, especially in our region. We have launched multiple initiatives to improve our value proposition to our employees further and work closely with the parent company to reskill our current workforce. In the same spirit, we also work with different universities to train and prepare future talent to join the workforce.

Disclosure 401-1



New employee hires and employee turnover



a. Total number and rate of new employee hires during the reporting period, by age group, gender, and region:

2023 NEW EMPLOYEE HIRED		
	Female	2
	Male	9
Summary		11

b. Turnover during the reporting period, by age group, gender and region:

2023 TURN OVER		
	Average number of employees	112
	Total number of employees who left (all male)	25
Turnover rate		22%

For 2023, we obtained the average number of employees by comparing the total number at the start and end of the year. By the time this data was provided, 25 employees had left with 11 new hired. Total employees number at the end of the year was 109.

Disclosure 401-2

Benefits provided to full-time employees not provided to temporary/part-time employees

LuNa Smelter has an equal-opportunity approach to employment. All our full-time employees receive life insurance, are entitled to parental leave, and have retirement provisions.



Disclosure 401-3

Parental leave



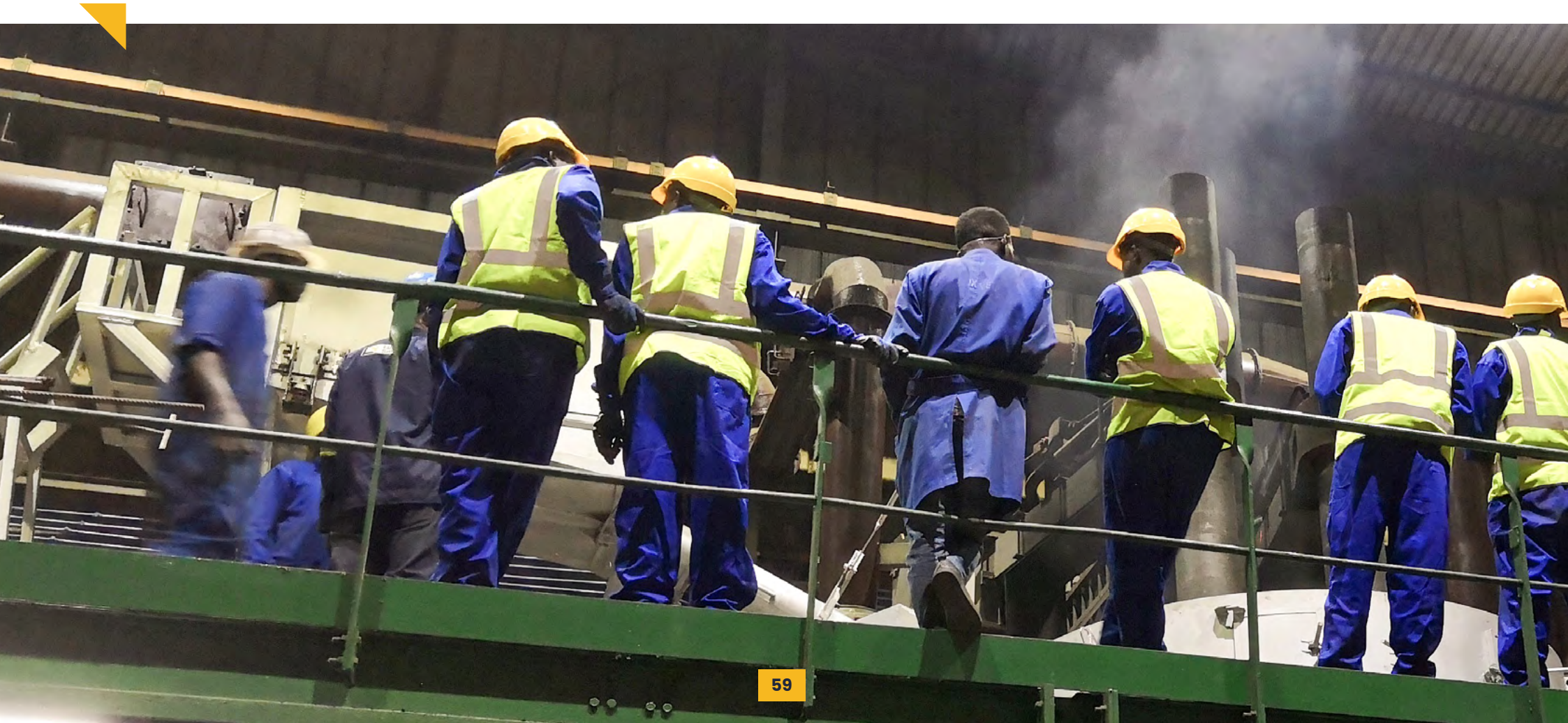
In accordance with the provisions of Chapter IV Article 54 of the Ministerial Order No. 02/MIFOTRA/23 OF 01/08/2023 determining the events that entitle one to a leave of circumstance, a male employee is entitled to a paternity leave of 7 working days in case of the delivery of his wife, while maternity leave grants to the female employee 14 consecutive weeks, of which at least two weeks can be taken before delivery. In case of complications due to delivery, LuNa Smelter grants the female employee a paid prolonged maternity leave for up to one month.

In 2023, 2 female employees were entitled to maternity leave, which they all took and returned to work.

Disclosure 402-1

Minimum notice periods regarding operational changes

Notice periods relating to significant operational changes are agreed on at the department level in the agreement with HR, who ensures employees are trained, applicable, and given ample time to adapt.



Disclosure 403-1

Occupational health and safety management system



Poor occupational health and safety (OHS) performance directly impacts labour costs through lower productivity. It can also affect a company’s reputation, impact staff morale, or increase operating costs through fines and other contingent liabilities. LuNa Smelter has developed an OHS policy and plans for quarterly training on safety for all employees.

LuNa Smelter takes measures to protect employees from all kinds of accidents. In support of this, LuNa Smelter has taken measures to prevent accidents, including the introduction of a health and safety committee appointed by the Board of Directors to educate employees through awareness and training activities that they are primarily responsible for the prevention of workplace accidents, enforce the utilisation of the appropriate Personal protective equipment (PPEs), existence of first aid kits in the work environment, and contract implementation with the healthy facilities to receive and handle emergency cases related to work accidents whenever they occur. The company’s goal is to implement the requirements of ISO 45001, an international standard for occupational safety management systems, in 2024.

Disclosure 403-2

Hazard identification, risk assessment and incident investigation

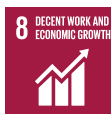
A risk and opportunities management procedure is in place, and risks related to each process have been identified. Each department procedure has a section about related / identified risks, and department heads and senior management meet regularly with the IMS coordinator to review the risks and update respective actions to mitigate them.

Environmental aspects (ISO 14001) to dust and noise have been identified, and suggested actions mitigate these impacts are in place.

Disclosure 403-5

Worker training on occupational health and safety

Refer to GRI 404.



Work-related injuries and fatalities

No.	Date of incident	General or Fatal	Department
LuNa SMELTER WORK RELATED INJURY			
1	31/01/2023	General	Maintenance
2	18/03/2023	General	Production
3	10/03/2023	General	Production
B&K			
1	0 Injuries		

Management Approach Disclosure

Our human resources development strategy is to capture and transfer knowledge and skills effectively to ensure succession management, operational excellence, and successful mining and smelting company management. We develop training plans annually by conducting training needs assessments, which allows us to prepare for relevant training to enhance employee skills and growth.

With the Human Resource procedure in place, knowledge transfer happens all the time, from informal water cooler conversations to formal knowledge transfer programmes such as:

- ▼ mentoring, coaching skills, answering questions, giving advice, etc.;
- ▼ temporary assignments;
- ▼ workshops, courses, manuals, handouts, policies, etc.;
- ▼ onboarding processes;
- ▼ on job trainings;



Disclosure 404-1

Average hours of training per year per employee



Trainings conducted in 2023

No.	Training name/Course	Number of employees	Hours of the training/employee
1	Training / internal Audit team on ISO 19011:2018 both EMS and QMS/Training on Auditing management Systems ISO 19011:2018	10	24
2	Health and safety training	32	36
3	Spiral crystallizer operation Training	5	8
4	Smelting Process	5	8
5	Tool box usage	13	2
6	House-keeping and PPE observation	24	3
7	Power system protection and switchgear Training	5	3
8	Use of electrical energy & machine operation manual procedures Training	9	4
9	Taxation training	5	8
10	Inventory and Warehouse Management	1	40

Internship Programme

No.	Training Department	Duration	Gender
1	Quality Control	1 month	M
2	Quality Control	1 month	M
3	Production	1 month	F
4	Production	1 month	F
5	Production	1 month	M
6	Production	1 month	M
7	Production	1 month	M
8	Production	1 month	F
9	Production	1 month	F
10	Production	1 month	F

Education sponsorship

No.	University	Duration
1	Kepler College Campus	3 years

Disclosure 404-2

Programs for upgrading employee skills and transition assistance programs



At LuNa Smelter, we know that upgrading employees' skills enhances the organisation's human capital and improves employees satisfaction. In 2023, we organised different programs aligned with employee's capacity development, varying from technical skills to leadership seminars. The company organised a special training for one of our warehouse officers to enhance his skills and work efficiently. The Advanced Certificate in Inventory and Warehouse Management dealt with all inventory and warehouse operation aspects. The employee obtained a certified international warehouse and inventory manager certificate with Optimum Business Communications Ltd in Kampala – Uganda.

In line with our value to support women's inclusion, LuNa Smelter also delegated one female manager to participate in the **International Women in Resources Mentoring Programme**. **This is the 3rd year that LuNa Smelter has delegated one of its employees to participate in such a program and is committed to continuing for the following years in the efforts to empower women, prepare them for leadership positions and inspire younger female generations through them.**

Disclosure 404-3

Percentage of employees receiving regular performance and career development reviews

100%



Management Approach

LuNa implements an equal approach to everybody regardless of race, sex, sexual orientation, language, religion, political opinion, national or social origin, property, birth, disability, or another social status. Under the code of Business Conduct Policy, LuNa Smelter strictly prohibits discrimination, harassment, forced labour, child labour, and violence in the workplace. The employees are entitled to a workplace free from harassment.

The Supply Chain Management Policy also states commitment to promoting supplier diversity across the supply chain.

The company has well-established procedures, policies, and programmes to attract and retain qualified and competent employees. Examples include our medical check-up policy, OHS procedures, leave policy, training needs, and other benefits.

Below are examples of what is incorporated and implemented in our retention strategy.

Internal promotion

This involves the company filling vacant positions through promotions of internal employees and the deployment of those acting in the same position.

Remuneration and benefits

The company offers competitive packages to its employees to stimulate their performance and productivity. Salaries are consistently paid promptly, and salary reviews and increments are implemented.

Other benefits

- a. Medical insurance for employees and their dependents
- b. Accidents / workmen compensation
- c. Payment in the event of death of an employee
- d. Meals and transport
- e. Training and development programmes
- f. Work-life balance: flexibility in working hours, request for leave, working remotely, etc.

Disclosure 405-1

Diversity of governance bodies and employees

General disclosure: Board Diversity



Disclosure 405-2

Ratio of basic salary and remuneration of women to men

The company does not report the specific ratio – confidential information.



Management approach disclosures

Same as GRI 405

None

LuNa Smelter is committed to the protection and advancement of human rights and to ensuring that our operation functions with integrity. In accordance with the OECD Due Diligence Guidance for Responsible Supply Chain of Minerals from Conflict-Affected and High-Risk (CAHRA) area, LuNa does not tolerate Child labour nor forced or compulsory labour. We also track our suppliers to confirm non-conformity with established policies.

Although the company is located in a CAHRA region, measures we undertook, including implementing a due diligence procedure and a supply chain management policy in place, have allowed the company to monitor and exclude suppliers considered to have significant risk of incidents of child labour. This is also demonstrated by LuNa Smelter's certificate as a conflict – free smelter by the Responsible Minerals Assurance Process (RMAP).

Disclosure 408-1

Operations and suppliers at significant risk for incidents of child labour

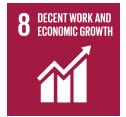


We confirm that all our suppliers are evaluated annually. Whenever the due diligence team finds a non-conformance, the supplier is given a period to remediate. If the company fails to conform, it is taken off our suppliers' list. In 2023, no supplier's contract was stopped due to conformance failure.



Disclosure 409-1

Operations and suppliers at significant risk for incidents of forced or compulsory labour



Same as GRI 408

Disclosure 410-1

Security personnel trained in human rights policies or procedures

ISCO, a prominent security service provider contracted to oversee security officers, conducts all the training sessions for the ten security officers at LuNa Smelter.



Rights of Indigenous People



The 2012 population census did not consider the indigenous composition of the population as part of the Rwandan government's policy to promote reconciliation, unity, and social cohesion. Therefore, we do not report on this specific topic.

Disclosure 412-1

Operation that have been subject to human rights reviews or impact assessments

Refer to [Disclosure 308-1](#).

Management approach disclosures



We invest in our communities, working through our employees and local partners to create a positive impact where we work, live and do business. We have CR teams who work:

- at the country level on programmes that are particularly culturally meaningful or aligned to primary needs within their home communities,
- at the Group level, the Luma Foundation allows employees to roll global programmes in the local community.

Engaging both locally and globally drives meaningful change and connects our employees. Luma Foundation was registered 2022 as a subsidiary of the parent company Luma Holding to structure our philanthropic activities and ensure that each activity is aligned with the company's mission and values.

LuNa Smelter also provides opportunities for employees to organise workplace volunteer efforts for the good of the community.

Philanthropic activities

in 2023

Donation to genocide survivors and mutuelle de sante for Rugarama sector-Gatsibo and to Kigali Genocide Memorial Centre

USD 4 345

Support to Afriquia Foundation

USD 2 550

LuNa Smelter supported the Afriquia Foundation in coordinating its activities in Rwanda, through its employees who continually provide in-kind support to the Foundation related to logistics, transport, and consultations.

Partnership with the University of Rwanda

One of our human resources development strategies is to capture and transfer knowledge and skills effectively to ensure succession management and operational excellence.

In 2021, LuNa Smelter signed an MoU with the University of Rwanda to support academic bridging the skills gap between what is taught at universities and the skills required in industries.

In 2023, LuNa Smelter welcomed ten interns from the University of Rwanda, five men and five women, to work in the quality control and production departments.

Management approach disclosures

We seek to build and sustain supplier relationships and a global supply chain that reflects the core values of inclusion and diversity, human rights, health and safety, and environmental sustainability that are critically important to us, our clients and our partners. Our forward-thinking approach to supply chain management helps ensure that our suppliers contribute to DXC's responsible business practices in areas such as screening for abuses, including slavery and the use of child labour; complying with EHS regulations and industry best practices; and implementing rigorous programmes to eliminate bribery and other illegal behaviour.

The company conducts mine site visits and assesses all OECD ANNEX 2 risks while collecting the KYC "Know Your Counterparty" form; we consider if the supplier's management and shareholders are not attached or connected to any terrorism or human rights abusers. OECD risks – commonly referred to as Annex II Risks, include risk of conflict, severe human rights abuses, money laundering, and mineral fraud.

Disclosure 414-1

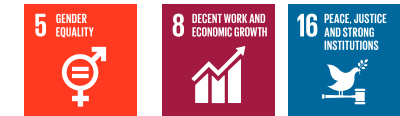
New suppliers that were screened using social criteria



All new suppliers are first requested to complete the KYC form, including a governance body check, financial & tax check, evidence of good legal standing for carried operations, and responsible supply chain policy and practices in place.

Disclosure 414-2

Negative social impacts in the supply chain and actions taken



We identified no suppliers as high risk based on performance issues related to modern slavery and human trafficking.

Disclosure 415-1

Political contributions

No political contribution was made by the company, either directly or indirectly.

Disclosure 417-1

Requirements for product and service information and labelling

Not applicable

Disclosure 417-2

Incidents of non-compliance concerning product and service information and labelling

None

Disclosure 418-1

Substantiated complaints concerning breaches of customer privacy and losses of customer data

The company did not record any customer complaint.

For more information about our business, please see:

[lunasmelter.com](https://www.lunasmelter.com)

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