	Code of Business Conduct		
	No: TD/IMS/PRO/08	Rev: 02	Rev Date: 1-Jul-2020

I. INTRODUCTION

Luna Smelter Ltd. (hereinafter referred to as LuNa or Company) place value on conducting business openly, honestly and with the utmost respect and integrity. The Code of Business Conduct (hereinafter referred to as the Code) alongside internal policies, procedures and the law, exists to help embody these values both within LuNa organization as well as in relation to business partners and society the Company operates in on a daily basis.


The Code helps to maintain the trust LuNa has built with its stakeholders: customers, business partners, subcontractors, suppliers, shareholders and local communities.. LuNa's Code of Business Conduct builds on and is consistent with the principles and standards contained in International Tin Code of Conduct designed by the International Tin Association. LuNa expects all suppliers, consultants, agents, sales representatives, distributors and independent contractors to uphold similar standards presented in this document.

The Code does not create separate standards for different groups. It applies equally to all employees, officers and directors of LuNa Smelter Ltd.

LuNa Smelter is fully committed to develop and implement the following principles:

2. PRINCIPLE I: LEGAL COMPLIANCE

Many of LuNa's activities are subject to complex and changing legislation governing domestic and international trade and commerce. Compliance with international, state and local regulations, rules and legislations is an essential principle of responsible business conduct. LuNa adheres to legal prohibitions and requirements at all times, even if this involves short-term business disadvantages or difficulties for the company or individuals. All employees are expected to conduct LuNa's business according to all legal regulations. Ignorance of the law is generally not considered as a valid defence when an infraction is committed, regardless of the jurisdiction where the company is operating. If any employee is unsure whether a particular legal provision is applicable or how it should be interpreted, then should consult with supervisor or the Legal Department.

	Code of Business Conduct		
	No: TD/IMS/PRO/08	Rev: 02	Rev Date: 1-Jul-2020

3. PRINCIPLE 2: ENVIRONMENTAL PERFORMANCE


LuNa will work towards implementing an environmental management system that utilizes the mitigation hierarchy: avoid, minimize, mitigate and compensate, in order to control and mitigate potential impacts to air, surface and greenhouse gases. The Company will seek to identify technically and financially feasible measures for reducing the direct and indirect consumption of energy and commits to dispose tailing in a manner that minimises the risk of impacts on the environment and human health and safety.

4. PRINCIPLE 3: LABOUR EQUALITY

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

The Code will not be interpreted or applied so as to interfere with employee rights to self-organize, form, join, or assist labour organizations, to bargain collectively through representatives of their choosing, or to engage in other concerted activities for the purpose of collective bargaining or other mutual aid or protection, or to refrain from engaging in such activities. While LuNa firmly believes work-related issues can be best resolved through internal channels rather than a social media outlet, nothing in this policy is designed to interfere with, restrain, or prevent employee communications regarding wages, hours or other terms and conditions of employment. While communicating with each other within the organization, employees must be open and honest. It is the only way to ensure quality in LuNa's activities.

The Company also commits to provide appropriate and periodic relevant training for employees and requires its contractors to train their workers on aspects relevant to their specific tasks and work areas.

	Code of Business Conduct		
	No: TD/IMS/PRO/08	Rev: 02	Rev Date: 1-Jul-2020

5. PRINCIPLE 4: HEALTH AND SAFETY

LuNa commits to ensuring the organization operates in a safe, efficient manner and will take all reasonable steps to ensure the health and wellbeing of the workforce by providing a safe working environment throughout its operations at all times. The Company will document reportable health and safety incidents using a transparent and inclusive procedure that allows affected workers to provide input. LuNa will also implement corrective actions in a timely fashion and monitor the effectiveness of such actions in order to ensure the continual improvement of health and safety performance.

6. PRINCIPLE 5: LUNA'S APPROACH TO THE STAKEHOLDERS AND ITS ASSETS


LuNa will identify and record the characteristics and interests of stakeholders affected by the Company's activities and plan a participatory approach. However, LuNa will not do business with a supplier where serious breaches of this Code are identified and where the supplier consistently fails to take corrective action within an agreed timescale.

All employees, subcontractors or other associate entrusted with access to or control over LuNa transactions and assets are expected to protect company's assets against theft, loss or misuse and ensure their efficient use. LuNa's assets considered as tangible items like buildings and equipment, as well as intangible items like business plans, potential prospects and all intellectual property.

Theft and fraud are crimes that will not be tolerated at LuNa. Theft of Company assets, in whatever form it takes, may result in termination of employment or criminal prosecution. LuNa also treats the theft of assets belonging to other employees on its premises in the same way as theft of company assets. When employees steal or commit fraud, it damages our reputation and brand. Theft and fraud will be investigated, reported to police as appropriate and is grounds for disciplinary action up to and including dismissal.

7. PRINCIPLE 6: DEVELOPMENT OF LOCAL COMMUNITIES

LuNa will also implement a systematic approach to the management of local populations in order to anticipate and avoid or minimize the adverse impacts of Company's activities on land rights, land

	Code of Business Conduct		
	No: TD/IMS/PRO/08	Rev: 02	Rev Date: 1-Jul-2020

use and compensate economically displaced people as required by all applicable local legislations. LuNa commits to contribute to the economic development of local communities and will minimize negative impacts on access to and availability of natural resources by affected communities.

8. PRINCIPLE 7: HUMAN RIGHTS AND CONFLICT

LuNa is strongly determined to respect human rights of all those who are affected by the Company's activities and to contribute for growing sustainable society through the use of technology, resources and knowledge as well as valuable commodities. LuNa will identify, evaluate and mitigate potential risks when sourcing minerals and seek to avoid purchases that may support conflict or human rights abuses according to international expectations and laws.

9. PRINCIPLE 8: POSITIVE INFLUENCE

LuNa acknowledges the importance of setting examples in the area as the leading manufacturing facility sourcing responsibly and promoting the development of the sector. To ensure so, LuNa is committed to encourage its stakeholders, with special focus on suppliers, work towards understanding the supply chain and continuous improvements. LuNa will support its stakeholders to manage environmental and health and safety impacts. The Company will raise awareness regarding concerns over forced and compulsory labor as well as concerns over human rights abuses and conflict within its supply chain and guide its stakeholders to operate legally meeting principles of this Code.

10. PRINCIPLE 9: PRODUCT RESPONSIBILITY

LuNa promotes research, innovation and collaboration that supports safe and efficient production, use of recycling materials including regulatory compliance and efficient use of energy and natural resources. The Company adheres the growing role of tin in low carbon future. Creating added value generation in the region impacts not only the overall socio-economic development of the region but also such environmental aspects as reducing the CO₂ footprint. LuNa, hereby, commits to communicate accurate information on impacts and use of its final products to workers, users in the value chain and wider stakeholders, accounting for the need for appropriate confidentiality

11. PRINCIPLE 10: REPORTING AND NON-RETALIATION

To ensure compliance with statements presented in the Code it is expected of anybody being influenced and especially bound by this document to report actual and potential violations of the Code. LuNa maintains a firm commitment to non-retaliation, meaning that all employees are free to make good-faith reports without fear of employment being negatively affected. Anyone found to have retaliated against another person for making a report in good faith is subject to disciplinary action—up to and including termination.

Where local laws permit, reports may be done anonymously, and LuNa will not take any steps to uncover the identity of person that file the report. Anonymous reports are taken seriously and are investigated as thoroughly as possible

If You have a question about the Code, need advice on a legal or ethical issue or would like to report actual or suspected misconduct, you should:

- speak with your supervisor,
- file a report anonymously, if desired please see the grievance procedure;
- in case of serious misconduct raise your concern by contacting directly the Board of Directors or refer to the grievance procedure.

12. MISCELENIIOUS


Gross Misconduct

Violations of the Code, LuNa's policies or the law may be met with disciplinary actions —up to and including termination existing agreements. Misconduct also includes any false allegations, regardless of whether they are made anonymously. Legal and ethical misconduct can also subject the individuals involved in LuNa to fines, penalties and civil or criminal prosecution.

Conflict Of Interest

All business decisions are made exclusively in the best interests of the Company. 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 must not, directly or indirectly:

	Code of Business Conduct		
	No: TD/IMS/PRO/08	Rev: 02	Rev Date: 1-Jul-2020

- have any financial interests that could have a negative impact on the performance of duties fulfilment, or derive any financial benefit from any contract between LuNa and a Third Party where particular employee in a position to influence the decisions that are taken regarding that contract; or
- attempt to influence any decision of LuNa concerning any matter with a view to deriving any direct or indirect personal benefit.

LuNa does not allow unfair business practices such as *bribery, kickbacks or insurance rebating* These practices are against LuNa Anti-Corruption Policy in all places where we conduct business.


Unless a supervisor, has given explicit prior written approval, no LuNa officer or employee may work for any organization that competes with LuNa or that has a business relationship with LuNa. This includes serving as a director, officer, trustee, partner, employee, consultant or agent. In addition, no officer or employee may serve as a director of any enterprise with publicly traded securities without first obtaining written approval from the LuNa's Board of Directors.

Internal, Personal And Confidential Information

Full and complete disclosure of important information to the public about LuNa, both financial and nonfinancial, involves numerous departments. This information may include employment history, government-issued identification numbers, contact information, marital status, criminal records and medical history, among other things. LuNa is committed to protecting this information, consistent with applicable data privacy laws, including the rules surrounding the collection, processing, use, transfer and disclosure of personal information.

All intellectual property and their associated worldwide intellectual property rights, such as copyrights and patents, will be owned by LuNa (and to the extent not owned by the Company will be hereby assigned to the Company) as long as otherwise is explicit appointed in binding agreement, contracts or any legal documents. Intellectual property includes but not limited to: ideas, concepts, methods, processes, inventions, confidential information and trade secrets, works of authorship, trademarks, service marks, marketing materials and designs

When in possession of Confidential Information, LuNa's employees and outside parties are encouraged to use the safest means of communication and safekeeping of the Confidential

	Code of Business Conduct		
	No: TD/IMS/PRO/08	Rev: 02	Rev Date: 1-Jul-2020

Information as is reasonably practicable under the circumstances. In particular, employees should be mindful of the security risks associated with communicating via email, social media, facsimile, cellular phones and other wireless devices, and of communicating in public places, and should choose other safer communication methods where reasonably practicable. “Confidential Information” includes all non-public information about the Company that might be of use to competitors or harmful to the Company or its customers if disclosed.

Proper Records

LuNa requires full and accurate records to meet its legal and financial obligations and to manage its business properly. LuNa’s books, financial reports, expense accounts, time sheets, administrative records and other similar documents must be completed accurately, honestly and in accordance with internal procedures. Making false, fictitious, misleading or inappropriate entries with respect to any transaction of LuNa’s or the disposition of any of the Company’s assets is prohibited, and no director, officer, employee, representative or associate may engage in any transaction that requires or contemplates the making of false, fictitious, misleading or inappropriate entries. Every employee and third parties are responsible for the accuracy and completeness of any reports or records created or maintained. Undisclosed or unrecorded assets, liabilities, revenues or expenses are prohibited.

Social Media

LuNa recognizes that the Internet allows members to participate in interactive discussions, share information, and advance business objectives using an ever-increasing number of Social Media sites and tools, such as Facebook, WeChat, LinkedIn and Twitter. At the same time, use of social media can pose risks to the LuNa’s Confidential Information, reputation and brands, and can jeopardize LuNa’s compliance with applicable laws, regulations and business rules. Postings/communications made through social media are or can become public and they may be difficult or impossible to rescind. Employees are accountable for what they post online.