

## 1. Purpose

The purpose of this Anti-Corruption Policy is to guarantee that LuNa Smelter operates its business with honesty and ethics. We are dedicated to acting professionally, fairly, and with integrity in all our business interactions by establishing and maintaining effective systems to prevent corruption.

## 2. Scope

This policy applies to all employees of LuNa smelter, including directors, officers, and managers. It also applies to consultants, contractors, suppliers, and any other third-party representatives acting on behalf of the company.

## 3. Definitions

**Corruption:** The abuse of entrusted power for private gain. It includes practices such as bribery, fraud, extortion, collusion and money laundering. It also includes an offer or receipt of any gift, loan, fee, reward, or other advantage to or from any person as an inducement to do something that is dishonest, illegal, or a breach of trust in the conduct of the organization's activities. This may include cash or in-kind benefits, such as free goods, gifts, and holidays, or special personal services provided for the purpose of an improper advantage or that may result in moral pressure to receive such an advantage.

**Bribery:** Offering, giving, receiving, or soliciting anything of value to influence the actions of an official or other person in discharge of a public or legal duty.

## 4. Policy statement

LuNa Smelter strictly prohibits all forms of bribery and corruption. We will uphold all laws relevant to countering bribery and corruption in all jurisdictions in which we operate, including but not limited to the Rwandan Penal Code, the Law on Prevention and Punishment of Corruption (Law No. 54/2018), and other applicable international anti-corruption laws.

## 5. Prohibited Practices

**Bribery:** Employees and associated persons shall not offer, give, solicit, or accept any bribe, whether in the form of money, gifts, loans, fees, rewards, or other advantages.

**Facilitation Payments:** The Company prohibits facilitation payments. Employees must decline any requests for such payments and report them to management.

**Gifts and Hospitality:** All gifts and hospitality, whether given or received, must be proportionate, reasonable, Extravagant or inappropriate gifts and hospitality are prohibited.

## 6. Responsibilities

**Employees:** All employees are responsible for reading, understanding, and complying with this policy. Employees must avoid any activity that might lead to, or suggest, a breach of this policy.



**Management:** Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

**Third Parties:** LuNa smelter expects all third parties it engages with to comply with this policy and will take appropriate actions if they fail to do so.

## 7. Reporting and Compliance

**Reporting:** Employees are encouraged to report any suspicions or knowledge of bribery or corruption activities. Reports can be made confidentially through the company's whistleblowing hotline or as per grievance procedure.

**Protection:** Employees who refuse to engage in bribery or corruption, or who report in good faith under this policy, will not suffer adverse consequences or retaliation.

## 8. Communication

LuNa smelter will communicate to all employees to ensure they understand the risks of bribery and corruption and their responsibilities under this policy. This policy will be communicated to all new employees and third-party representatives as part of their induction process.

## 9. Record-Keeping

All accounts, invoices, and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness. No accounts may be kept "off-book" to facilitate or conceal improper payments.

## 10. Monitoring and Review

The company management is responsible for monitoring the effectiveness of this policy and regularly reviewing its implementation. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

## 11. Consequences of Non-Compliance

Non-compliance with this policy may result in disciplinary action, up to and including termination of employment. Violations of anti-corruption laws can also result in severe fines and penalties for both the company and individuals involved, including imprisonment.





**12. Review and Revision:**

This policy will be reviewed periodically to ensure its effectiveness. LuNa Smelter reserves the right to amend this policy to meet changing legal requirements or to enhance its effectiveness.



Serge NGABOYISONGA  
MANAGING DIRECTOR

22<sup>nd</sup> April 2025  
DATE

CONTROLLED