

PREAMBLE

Throughout businesses conducted by LuNa Smelter Ltd. (hereinafter referred also to as the “LuNa”) there is potential for a major impact on the both local societies and environment. LuNa is strongly determined to respect the human rights of all those who are affected by our business activities and to contribute for growing sustainable society through the use of our technology, resources and knowledge as well as valuable commodities.

INTRODUCTION

LuNa has established the Human Rights, (“the Policy”), considering the United Nations (UN) Universal Declaration of Human Rights and the two International Covenants making up the International Bill of Human Rights, the International Labour Organisation’s (ILO) Declaration of Fundamental Principles and Rights at Work and the United Nations Global Compact (together, for the purposes of this Policy, the above documents are called the “International Human Rights Declarations”) but also state and international legislation concerning Occupation Health and Safe regulation as well as environmental regulation of country Company operates in.

SCOPE

This Policy applies to all our business offices, plants, laboratories, mining sites, subsidiaries and related companies worldwide. In addition, we will encourage business partners, including suppliers, sales partners and contractors, to support human rights and prevent infringements of rights, and cooperatively promote respect for human rights.

SPECIFIC COMMITMENTS AND PROVISIONS

Commitments to Employees:

We are committed to respect the human rights of our employees. We develop our employment policies with the aim to achieve uniform worldwide application of the relevant aspects contained in the International Human Rights Declarations. We are committed to train our employees to be aware of and respect human rights in the workplace and in the local communities directly impacted by our operations.



Business partners:

We seek to respect and promote human rights when engaging with subcontractors, suppliers, customers, joint venture and other partners. We will do this, as appropriate, through proactive engagement, monitoring, certification and contractual provisions. Suppliers operating in, or procuring from, areas where we identify our most severe risks, will be the key focus of this engagement.

Local communities:

We seek to respect the human rights of local potentially-affected peoples and to develop an understanding of the cultures, customs and values that prevail in our local communities by developing an inclusive and open dialogue with the people affected by our operations. LuNa conduct an open and inclusive dialogue with local communities, including engaging with often under-represented groups such as women, children and Indigenous Peoples.

Promoting Freedom of Association

LuNa upholds freedom of association and the effective recognition of the right to collective bargaining. We also work with our subcontractors and suppliers to promote the achievement of this principle.

Eliminating Forced or Compulsory Labour, human trafficking and all forms of Modern Slavery

LuNa opposes the use of forced or compulsory labour, human trafficking and all forms of modern slavery both within its own operations and through its supply chain. We will undertake work with our subcontractors and suppliers including due diligence within our supply chains to avoid indirectly benefitting from or promoting such illegal practices. LuNa Smelter Ltd. will ensure that operational grievance mechanisms allow for cases of forced labour to be submitted and addressed.

Abolishing Child Labour



LuNa does not accept Child Labour and supports the United Nations (U.N.) Convention on the Rights of the Child (1989). Company Child Labour Code of Business Conduct is based on this Convention,

LuNa requires that all contractors and suppliers shall recognize the U.N. Convention on the Rights of the Child, and that the suppliers comply with all relevant national and international laws, regulations and provisions applicable in the country of production. Suppliers and contractors are obliged to take the appropriate measures to ensure that no Child Labour occurs at suppliers' and their sub-contractors' places of production.

If Child Labour is found in any place of production, LuNa will require the supplier or the contractor to implement a corrective action plan. If corrective action is not implemented within the agreed time-frame, or if repeated violations occur, Company will terminate all business activities with the supplier or contractor concerned. A corrective action plan shall take the Child's best interests into consideration, i.e., family and social situation and level of education. Care shall be taken not merely to move Child Labour from one supplier's workplace to another, but to enable more viable and sustainable alternatives for the children. The supplier or contractor shall effectively communicate to all its sub-contractors, as well as to its own co-workers, the content of the LuNa Human Rights Policy, and ensure that all measures required are implemented accordingly.

Eliminating Unlawful Discrimination in the Workplace

LuNa is committed to ensure that each employee and potential employee is treated with fairness and dignity. Accordingly, any unlawful discriminatory practice based on race, colour, gender, sexual orientation, age, religion, ethnicity, national or social origin, property, political or other opinion, disability, birth or any other basis will not be tolerated. The Company seeks to provide each employee with equal opportunity for advancement without discrimination.

Eliminating Harassment and Violence

LuNa is committed to promote a work environment free of any form of harassment, exploitation, abuse or violence as defined by the laws of each country in which we operate.

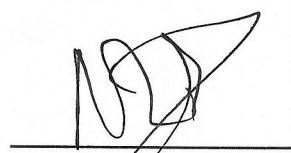
Providing Competitive Compensation and Remuneration



LuNa aims to pay competitive wages based on local market assessments and at a minimum seeks to provide a commensurate compensation for each employee. All employees should receive clear verbal and written information regarding wage conditions and the schedule for payment of their remuneration in a language that is understandable to them. Employees should be informed about amount of their wages and any deductions from their wages each time they are paid their wage.

Upholding Conditions of Employment

LuNa complies with all laws regarding conditions of employment including basic and overtime working hours, and will abide by agreements negotiated with our employee representatives. The maximum working time stipulated in a respective state, as well as agreements, if any, shall be respected. Regular working times, overtime and paid holiday shall also comply with local statutory provisions at a minimum if there are no collective agreements. Overtime shall not replace insufficient remuneration and shall be in harmony with local laws regarding wages, occupational health and safety.



Serge NGABOYISONGA
MANAGING DIRECTOR

22nd April 2025

DATE