

	RISK MANAGEMENT POLICY		
	No: LUNA/IMS/POLICY/17	Rev: 01	Effective Date: 23 rd December 2025

In line with joint initiative of ICGLR and OECD Due Diligence Guidance for Responsible Supply Chain of Minerals from Conflict- Affected and High –Risk Areas LuNa Smelter Ltd. will:

- immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses.
- will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups.
- immediately devise, adopt and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, where we identify that such a reasonable risk exists. In such cases, we will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan.
- commit to engage with suppliers, central or local governmental authorities, international organisations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measurable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.



Serge NGABOYISONGA
MANAGING DIRECTOR

23rd December 2025

DATE