
LUMA TRADING LIMITED

WHISTLE-BLOWER PROCEDURE

§1

Introduction

This is to establish the rules concerning the anonymous reporting, by the Company's employees or by other persons performing activities for the entity, of actual or potential breaches of law or Internal regulations applicable at Luma Trading Limited.

Luma Trading is committed to maintaining the highest standards of business conduct and ethics (see the Company's Business Conduct and Ethics Policy for further information). This encompasses a commitment to full compliance with all applicable government laws, rules and regulations, including those related to anti-bribery and anti-corruption, health and safety and environmental issues, human rights, corporate reporting and disclosure, accounting practices, accounting controls, auditing practices.

For the purposes of the Policy, the scope of reportable matters is intended to be broad and comprehensive and to include any matter, which in the view of the complainant, is illegal, unethical, contrary to the policies of the Company or in some other manner not right or proper. Examples include, but are not limited to:

- a) Violation of any applicable law, rule or regulation that relates to corporate reporting and disclosure;
- b) Violation of the Company's Business Conduct and Ethics Policy, its Human Rights Policy and Supply Chain Policy and other policies;
- c) Violation or the risk of violation of any applicable laws or Company policies or procedures in relation to health and safety or the environment;
- d) Fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;
- e) Fraud or deliberate error in the recording and maintaining of financial records of the Company;



- f) Deficiencies in, or noncompliance with, the Company's internal policies and controls;
- g) Misrepresentation or a false statement by or to a director, officer or employee of the Company respecting a matter contained in the financial records, reports or audit reports; and
- h) Deviation from full and fair reporting of the Company's consolidated financial condition.

§2

Definitions

Wherever in this procedure reference is made to:

- a. Reporting person or whistle-blower - it is a person who reports the breach of law or internal regulations applicable at Luma Trading Limited.
- b. Breach - it means an actual or potential breach of law or acting not in compliance with the internal regulations applicable in the company,
- c. Report - it means imparting of information on actual or potential breaches to a designated organisational unit, in line with this Procedure.

§ 3

Communication of the Policy

To ensure that all officers, employees, consultants and contractors, and directors of the Company (together, referred to as "**Responsible Persons**"), are aware of the Policy, a copy of the Policy will be distributed to all Responsible Persons, or alternatively they will be advised that the Policy is available on the Company's website for their review. New joiners will receive information on the Policy as part of their onboarding. Additionally, a copy of the Policy will be posted at mine sites operated by the Company. All Employees and Directors will be informed whenever significant changes are made.

§ 3

Manner of the Reports collection

1. Every report received will be sufficient to initiate the investigation.



2. The Reporting Person may report the information on a Breach of regulations in two ways, i.e. by:
 - a. anonymous report – no possibility to identify the Reporting Person,
 - b. non-anonymous report – providing a possibility to identify the Reporting Person and reply them.
3. The Reporting Person may report the information on a Breach of regulations to the Audit and Internal Control Office.

Luma Services sp. z o.o.

Attention : Report for Audit and Internal Control Office

Cieszyńska 23 G

43-170 Łaziska Górne

Poland

Any person who wishes to report an instance of known or suspected misconduct should do so by using the afore mentioned details.

4. Alternatively the report can be sent via e-mail to the following address whistleblower@lumatrading.eu. The Company warrant and guarantee that the address e-mail indicated above is handled by independent audit service.
5. Upon receipt of the report (excluding the reports made anonymously) by the Audit Office, the Audit Officer shall inform in writing about the report obtained and initiation of the verifying actions.
6. A submission should include a detailed description of the activity regarding which there is a report or concern and, if known, should specify the date(s) and location(s) of such activity. The whistle blower may optionally indicate his personal data.
7. The identity of persons making reports will not be disclosed.

§ 4

No Adverse Consequences

A submission, in good faith, may be made by reporting person without fear of dismissal, disciplinary action or retaliation of any kind. The Company will not punish nor take any punitive activity against the reporting person.



§ 5

Treatment of reports

The internal proceeding shall be limited to 30 days from the date of the report's receipt however in the particularly complicated cases, the above mentioned term may be extended. The reporting person shall receive the information about the extended term from the Audit Officer if the reporting person disclosed the correspondence address (e-mail or other correspondence details).

Upon termination of investigation initiated by the report obtained, the Audit Officer shall prepare the audit report including detailed description of the reported infringement, actions taken, persons engaged in case an

d their role in case as well as recommendations of corrective measures.

Audit and Internal Control Office shall provide the Board of Directors with the final audit report.

After review of the audit report, The Board of Directors shall take necessary decisions aiming to removal the actual or potential infringements.

In case the obtained report constitutes the breach of existing laws, the Board of Directors shall notify about such fact to the relevant authorities directly or by proxy.

Upon termination of investigation initiated by the report obtained, the reporting person shall receive the notice about the result of the investigation process.

§ 6

Manner of personal data protection

1. Personal data of the Reporting person and a person who is alleged to have violated the regulation will be subject to protection in line with personal data protection provisions, in particular in line with provisions of the regulation(EU) 2016/679 of 27/04/2016 of the European Parliament and of the Council on protection of natural persons in conjunction with personal data processing and on the free movement of such data and on repealing directive 95/46/EC (General Data Protection Regulation)(Official Journal of EU L 119, p. 1).



2. Re Alloys shall store personal data disclosed in the submitted report for the period of an investigation, and after its completion - for the period necessary for remedying the detected irregularities and holding the parties engaged in the action liable, if that be required by the generally applicable law, however not shorter than 3 years of the submitting the Report.

§7

Confidentiality principles in case of disclosure of identity of the involved persons

1. In case of disclosure of the Reporting Person identity, or identity of the person alleged to violate the regulations, or if their identity can be determined, the Re Alloys shall ensure above-average measures in terms of confidentiality. In particular, the Management Board of Re Alloys provides extraordinary protection against discriminatory or retaliatory measures.

2. In case of occurrence of such undesirable actions, a person who experienced such situation may notify of the circumstances and type of actions they have experienced. After receiving such a notification, measures shall be taken immediately in order to minimise or eliminate undesirable actions, respectively to the circumstances.

§8

Amendment, Modification and Waiver

The Board of Directors of the Company will review and evaluate this Policy on an annual basis to determine its efficacy.

§9

Publication of the Policy on Website

This Policy will be posted on the Company's website at www.lumatrading.com.

Last Approved:

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