

LUMA TRADING LIMITED

SUPPLY CHAIN POLICY

Luma Trading is committed to conducting its business in an ethical, socially responsible and sustainable manner in the whole business activity, including sourcing and supply of minerals as well as in the trade of ferroalloys.

This extends to its suppliers, who are a vital contributor to the Company's business. The Company seeks to utilize its supply chain and procurement to multiply the positive impact of the company on local, regional and national economies.

Recognizing that risks of significant adverse impacts may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high risk areas, and recognizing that companies have the responsibility to respect human rights and not contribute to conflict, we commit to adopt, widely disseminate, make publicly available and incorporate in contracts and/or agreements with suppliers the Company's Supply Chain Due Diligence policy for responsible sourcing of minerals (namely Tin- and Tantalum-contained) from conflict-affected and high-risk areas, as representing a common reference for conflict-sensitive sourcing practices and suppliers' risk awareness from the point of extraction until end user. We commit to refraining from any action which contributes to the financing of conflict and we commit to comply with relevant United Nations sanctions resolutions or, where applicable, international and domestic laws implementing such resolutions. The policy will be publicly communicated via the Company web site. The policy will be reviewed annually and updated as necessary.

Regarding serious abuses associated with the extraction, transport, trade of minerals or ferroalloys:

- While sourcing from, or operating in, conflict-affected and high-risk areas, we will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:
 - any forms of torture, cruel, inhuman and degrading treatment;
 - any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily;
 - all forms of child labour;



- other gross human rights violations and abuses such as widespread sexual and gender-based violence; and
- war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

Regarding risk management of serious abuses:

- We will immediately suspend or discontinue engagement with upstream suppliers or downstream customers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses.

Regarding direct or indirect support to non-state armed groups:

- We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. “Direct or indirect support” to non-state armed groups through the extraction, transport, trade, handling or export of minerals includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:
 - illegally control mine sites or otherwise control transportation routes, points where minerals or ferroalloys are traded and upstream actors in the supply chain; and/or
 - illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals or ferroalloys are traded; and/or
 - illegally tax or extort intermediaries, export companies or international traders.

Regarding risk management of direct or indirect support to non-state armed groups:



- We will immediately suspend or discontinue engagement with upstream suppliers or downstream customers 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.
- Regarding public or private security forces:
- We agree to eliminate, direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.
- We recognize that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.
- Where we or any company in our supply chain contract public or private security forces, we commit to or we will require that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights. In particular, we will support or take steps, to adopt screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.

Regarding risk management of public or private security forces:

- In accordance with the specific position of the company in the supply chain, we will immediately devise, adopt and implement a risk management plan with upstream suppliers and other downstream customers and stakeholders



to prevent or mitigate the risk of direct or indirect support to public or private security forces. 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.

Regarding bribery and fraudulent misrepresentation of the origin of minerals:

- We will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export.

Regarding money laundering:

- We will support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals or ferroalloys derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers and downstream customers and stakeholders.

Regarding the payment of taxes, fees and royalties due to governments:

- We will ensure that all taxes, fees, and royalties related to mineral extraction or ferroalloys production, trade and export from conflict-affected and high-risk areas are paid to governments;

Regarding risk management of bribery and fraudulent misrepresentation of the origin of minerals, money-laundering and payment of taxes, fees and royalties to governments:

- In accordance with the specific position of the company in the supply chain, we commit to engage with suppliers, central or local governmental authorities, international organizations, 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 or downstream customers and stakeholders after failed attempts at mitigation.

We are aware that supply chain risks and challenges may change. This Policy (and any internal procedures driven by it) is intended to be organic and evolve in accordance with our knowledge of supply chain issues in the region in which we operate.

We believe in building genuine relationships based on mutual respect and trust with the counter parties with whom we transact. In the event of breaches of trust, the Company reserves the right to take any action deemed necessary in line with the Policy, up to and including terminating any business relationship.

We will ensure that this Policy is publicly available on the Company's website, accessible to all relevant internal and external stakeholders and reviewed annually by the Company's Board to ensure that it is operating effectively.

