

Anti-bribery and Corruption Policy

1 Objective

Quantum Group, LLC (“Quantum”) reputation is built on the company's ethics and integrity. To keep this reputation, we must be beyond reproach in all actions on behalf of the company. By establishing guidelines, this Policy will aid Quantum staff in handling concerns such as bribery, corruption, and business gifts.

The following are the policy's key objectives:

- Create a corporate culture that prohibits bribery, corruption, and the acceptance of business gifts;
- Establish a consistent framework for the aforementioned goals.

2 Responsibilities

Senior Management is responsible for the policy's implementation and for ensuring that Quantum's affiliates, business partners, and suppliers follow the policy's regulations to the letter. Senior Management is responsible for ensuring that this policy is followed and that cross-functional communication with all business partners is maintained.

Quantum values hard work and rigorously prohibits its employees, service suppliers, and agents from engaging in bribery and corruption, as well as any activity that could give rise to the appearance or suspicion of such illegal acts. Bribery is described as the offer or acceptance of any gift, loan, fee, prize, or other undue advantage to or from any person in exchange for doing something that is dishonest, illegal, or a violation of trust in the operation of the enterprise's business.

There are laws throughout the world combating bribery and corruption, particularly with respect to government officials, including laws that apply to Quantum's activities. Quantum will conduct business in accordance with all established anti-bribery and anti-corruption laws, and all Company employees and agents are required to refrain from engaging in any action that could expose the Company to any illegal behavior.

3 Definition

Any valuable good or service that is offered or received in the framework of a business relationship with one or more Quantum representatives for which the recipient does not pay the fair value of the linked good or service is referred to as a business gift. Business gifts can include, but are not limited to, the following:

- Goods,
- Services,
- Entertainments,
- Travels, and
- Meals, among other things.

In an arm's length transaction, fair value is the compensation that would be paid for goods and services between knowledgeable willing parties.

Corruption is when public or entrusted power is abused for personal benefit.

Bribery is defined as the offer, promise, or payment of something of value, or any other sort of incentive, to a person in a position of trust in order to influence that person's ideas or behavior. Bribery and corruption can take a variety of forms, including monetary bribes, false jobs or "consulting" ties, kickbacks, political contributions, charitable contributions, gifts, hospitality or entertainment, and cost reimbursement.

4 Facilitation payments

Quantum staff should never pay or use third parties to pay an unofficial gratuity to government officials or workers in order to secure or expedite routine administrative duties such as customs clearances, visas, permits, or licenses.

5 Political contributions

Quantum has adopted a general policy prohibiting Quantum affiliates from making political contributions to political parties or candidates.

6 Third party compliance and Quantum due diligence

Quantum respects third parties with care and will never pay bribes or engage in corrupt acts with them. Suppliers, service providers, distributors, and third parties acting on Quantum's behalf are required to act with integrity and to follow anti-bribery regulations. The decision to buy from a certain supplier, hire a service provider, or appoint a commercial agent or distributor must be based on a thorough due diligence process that adheres to Corporate Guidelines. If it becomes evident or is likely that a third party is participating in illegal or illicit acts during the course of the partnership, the Legal and/or Compliance Functions must be immediately notified for guidance.

7 Records and documentation

Quantum requires that all business transactions and financial flows, including those involving the company's provision of gifts, hospitality, travel, entertainment, scholarships, grants, and charitable contributions, be properly recorded, classified, and documented as part of its internal controls against corruption.

8 Exemptions

Gifts such as t-shirts, pens, trade show bags, and all other promotional items obtained by employees as members of the public at events such as conferences, training events, seminars, and trade shows that are offered equally to all members of the public attending the event are exempt from this policy. Participation at events, as well as food, beverages, and other promotional products offered at events, exhibitor trade show floor locations, press events, and parties sponsored by conference or event sponsors are all included.

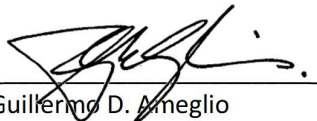
Cards, thank you letters, certificates, and other written expressions of gratitude and acknowledgment are exempt.

Food, beverages, and moderately priced lunches or tickets to local events provided by and attended by current customers, partners, vendors, or suppliers in the goal of fostering strong business ties are exempt. This low-cost entertainment is provided as part of a "working" meeting or session in order to benefit and progress positive working relationships and company goals. Quantum is expected to reciprocate by engaging in similar activities.

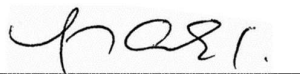
Approved by the Board of Authorized Members,

Adopted: November 1, 2019

Updated: September 11, 2020, and June 30, 2021



Guillermo D. Ameglio
Co-Owner, Managing Partner
Republic of Panama



Argelis F. Ameglio
Co-Owner, Managing Partner
Republic of Panama



Carlos Ortega
CEO
Miami, FL

Acknowledgement

Company name: _____ a duly organized corporation in accordance with the laws of _____ [country] with headquarters in the city of _____ and duly represented in this act by (Name) _____ (Title) _____ declares to accept the principles contained in this Anti Bribery and Corruption Policy, and to comply with the terms and conditions of this code.

_____ of _____ 20 _____

(Signature) _____