

## SUPPLY CHAIN DUE DILIGENCE POLICY OF QUANTUM GROUP, LLC AND ITS PARTNER SITES

Quantum Group, LLC, and its sibling firms, as a family-owned business with a 20-year history, have committed to the notion of sustainability by creating the Quantum Group, LLC Code of Conduct and issuing a sustainability report. As a result, we recognize that selecting and controlling suppliers, particularly in precious metal trading and sourcing crucial raw materials, is critical for a firm focused on sustainability.

### Sourcing Guideline

For our precious metal trading business, we follow tight guidelines when it comes to supplier selection and supervision. Our global efforts ensure that we only purchase precious metals from genuine and ethical sources that have not been linked to criminal activity, armed conflict, or human rights violations.

We aim to establish long-term relationships with our immediate suppliers and counterparties.

We exercise due diligence with our precious metals suppliers consistent with The Organization for Economic Co-operation and Development Guidance (OECD), the respective responsible guidance of LBMA and LPPM, the Responsible Business Alliance's responsible Minerals Assurance Process (RMAP) and comply with the European Union regulation 2017/817.

### Precious metals

We presently source and intermediate Gold and Silver.

### Handling of risk products

"Danger products" are those whose exploitation and acquisition pose a very high risk of human rights violations, violations of international trade regulations, and the execution of criminal acts. Special due diligence obligations exist when accepting risk products into our supplier chain. We will not tolerate, benefit from, contribute to, help with, or be associated with:

- Occupational safety violations
- Torture, harsh, inhumane, and humiliating treatment
- Child labor, or any form of forced labor
- Other heinous human rights breaches and abuses, such as pervasive sexual violence
- Corruption or other unlawful actions such as bribery or money laundering
- Violations of granting the freedom of association or the right to organize
- Violations of international humanitarian law
- War crimes, genocide, or other crimes against humanity
- Direct or indirect assistance for non-state armed organizations, as well as public and private security forces
- False misrepresentation of mineral origin
- Failure to pay taxes, fees, and royalties to governments
- Failure to comply with environmental and sustainability regulatory criteria

Should we discover a risk as indicated above, we will promptly disengage and not participate with any business opportunity or business partner. Business ties with partners who violate those values are not tolerated at our company.

### Our compliance system for precious metals

Quantum Group, LLC has implemented effective and comprehensive compliance management systems based on strong local and international KYC due diligence practices to combat money laundering and bribery in commercial transactions, as well as to comply with the OECD due diligence guidance on minerals from conflict-affected and high-risk areas.

This establishes our responsibility for risk-based due diligence, screening, and monitoring of transactions, as well as governance frameworks for all Quantum Group, LLC firms participating in acquiring, selling, or other transactions with minerals from Conflict-Affected and High-Risk Areas.

Our high-risk definition is based on Annex II of the OECD due diligence guidance on Minerals from Conflict-Affected and High-Risk Areas and includes Gold and Silver as well as other Minerals. The Compliance Officer

has the ability to refuse any new high-risk vendors. The supply chain is under the ultimate control and responsibility of senior management.

We expect our precious metal and precious metal-containing material suppliers to take adequate steps to ensure that they implement a similar policy and that the policy's terms are communicated to their employees and downstream in their supply chain.

Annual training sessions with relevant personnel are held, and they are encouraged to report any questionable transactions to management right away.

### **Identifying and assessing risks in the supply chain**

We created a client database for each supplier and assigned a risk profile based on our internal compliance requirements. Before beginning any business engagement with our precious metals providing counterparty, we must go through this process.

We undertake a thorough due diligence review on any minerals originating in or transiting through Conflict-Affected and High-Risk Areas. A business partnership can only be established if we can rule out any of the risks stated above for these products.

In addition, we use advanced IT systems to conduct adequate examination and monitoring of all transactions carried out during the course of our interaction with our counterparts.

The governance, roles and responsibilities, internal audit, training schedules, and communication have all been defined using an internal management system. This process has been allocated to the compliance officer, who reports directly to the executive senior management.

At least once a year, we assess our system for any flaws and make any necessary improvements to satisfy any new needs.

### **Grievance mechanism:**

We encourage our employees and other external stakeholders to use our grievance procedure, which allows them to anonymously express their concerns about our supply chain or any newly detected risk. Any attempt to identify a whistleblower who has chosen to raise his concerns anonymously is strictly prohibited.

Please use one of the following alternatives to send us any supply chain complaints so we can receive, review, and respond appropriately.

**Our internal compliance hotline: +1 (786) 245-0688 or write to: [info@quantumgroup.us](mailto:info@quantumgroup.us)**

Concerns can also be expressed through the Responsible Minerals Initiative's grievance mechanism at:

<http://www.responsiblemineralsinitiative.org/minerals-due-diligence/risk-management/grievance-mechanism/>

Similarly, anyone else involved in the gold or silver supply chains is encouraged to [contact LBMA](#) with all legitimate concerns they may have.

### **Due Diligence**

Prior to entering a new business partnership with any of our precious metals providing counterparts, we execute due diligence on them, which includes all of the steps needed by the newest LBMA Responsible Gold & Silver Guidance and related LPPM Guidance.

Before we process precious metal bearing material, we have a comprehensive lot-receipts process in place, which requires appropriate documents to be received and transactional details to be input.

Our precious metals supplying counterparts are divided into the following categories:

### **Mining counterparts**

To comply with OECD rules, we may request a third-party due diligence audit report or, if one is not available, we undertake on-site audits ourselves. These audits are based on the LBMA or LPPM questionnaire on mined material, which includes an assessment of the mining site's environmental impact.

**Recycling material – secondary precious metals**

Before we accept material from any of our counterparties, we must carry out checks on them. We use very strong due diligence techniques and material inspections when recycling material from high-risk nations to avoid commingling of secondary precious metals with precious metals of uncertain or conflict-affected provenance.

**For investment precious metals**

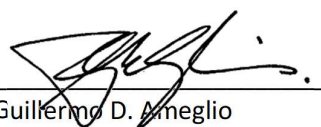

The OECD due diligence guidance on Minerals from Conflict-Affected and High-Risk Areas is referenced in our supplier agreements.

**Third party audit**

The LBMA, LPPM, and RMI standards, as well as the regulations set forth in the OECD due diligence guidance on Minerals from Conflict-Affected and High-Risk Areas, may be audited by an independent third-party every year.

**Approved by the Board of Authorized Members**

Adopted: Jan 20, 2020  
Updated: January 23rd, 2026

  
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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 Supply Chain Policy, and to comply with the terms and conditions of this code.

\_\_\_\_\_ of \_\_\_\_\_ 20\_\_\_\_

(Signature) \_\_\_\_\_