



QML Responsible Metals Sourcing and Supply Chain Integrity Policy

As a global leader in the sourcing of industrial and precious metals, QML and its Affiliate businesses are keenly aware of the risks and potential significant adverse impacts associated with industrial and precious metals sourced from Conflict-Affected, High-Risk Areas (CAHRAs). QML and its Affiliate businesses recognize that we have the responsibility to respect human rights and not to contribute to conflict and other forms of crime and corruption.

Our business practices are strictly maintained within the scope of the U.S.A. PATRIOT Act, Dealers in Precious Metals Regulations, U.N Resolutions, Section 1502 of the Dodd Frank Act, EU Regulation 2017/871, the Foreign Corrupt Practices Act/UK Bribery Act, and the OECD Annex Model Policy.

QML and its Affiliate businesses will only purchase, sell and provide services to counterparties that are not involved in, or contributing to illegal armed groups, human rights violations, and financial crimes, as further defined in Annex II of the Organization of Economic Cooperation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance-Annex II) and listed here:

- Serious abuses associated with the extraction, transport, or trade of minerals:
- Any forms of torture, cruel, inhumane, and degrading treatment;
 - Any forms of forced or compulsory labor;
 - Any forms of child labor;
 - Other human rights violations and abuses such as widespread sexual violence;
 - War crimes or other serious violations of international humanitarian law, crimes against humanity and genocide;
 - Direct or indirect support to non-state armed groups;
 - Direct or indirect support to public or private security forces;
 - Bribery and fraudulent misrepresentation of the origin of minerals;
 - Money Laundering;
 - Nonpayment of taxes, fees, and royalties to governments.

In support of the above commitments, all QML and its Affiliate business personnel are directed to follow and be trained on procedures to implement a conflict minerals due diligence system designed to:

- Exercise due diligence with all suppliers/clients consistent with QML's Anti-Money Laundering (AML) Policies and the OECD Guidance and the Responsible Business Alliance's Responsible Minerals Assurance Process and encourage/monitor our suppliers that they the same;

- Provide and expect that our suppliers/clients cooperate in providing due diligence information to confirm materials in our supply chain do not contribute to illegal armed groups, human rights violations, or financial wrongdoings as defined in Annex II of OECD Guidance;
- Support and build capacities of suppliers and counterparties to improve performance and conform with QML's responsible supply chain policy;
- Immediately suspend or discontinue engagement with suppliers after failed attempts at mitigating suspicious activity;
- Undergo an annual programmatic assessment by an objective third-party to verify our conformance status, as well as identify opportunities to continually improve our conflict minerals and suspicious due diligence management systems;
- Commit to transparency in the implementation of this policy by making available reports on our progress to our customers, upstream providers, relevant stakeholders, and the public (as required).

If you have specific questions or would like additional supporting information, please contact Mr. David Lafond, QML's Anti-Money Laundering Compliance Officer at (401) 762-0094, or dlafond@qml.us.

We require that our employees, agents, consultants, and business partners comply with this policy. We will enforce this policy with appropriate measures, up to termination of employment and commercial contracts.

Best Regards,



David Lafond
AML Compliance Officer
401-762-0094 ext. 211 • dlafond@qml.us
QML Inc.
QML is an ISO 9001:2015 Certified Company
MST is an ISO 9001:2015 & 14001:2015 Certified Company



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Customer/Agent/Third-party Contractor Acknowledgement:

Date: _____

Company Name: _____

Name: _____

Title: _____

Signature: _____

Please Return To:

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