DAEMS GROUP

Know Your Counterparty Policy

DAEMS GROUP has installed the following KYC-policy (Know Your Counterparty) and procedures for all its customers and suppliers of gold, silver, platinum group metals, diamonds and colour stones or all jewellery products containing any of these materials. The goal is to verify the identities, better understand the nature and legitimacy of our customer and supplier's business and to identify and flag any risks as described by the Financial Action Task Force (FATF).

Procedures:

- Our relevant business partners will be asked to fill in the KYC-questionnaire and provide supporting documents at the start of our professional relationship. Where triggered by a risk assessment or applicable law, we will establish the beneficial ownership and principals of the counterparty.
- We will verify that the counterparty and their ultimate beneficial owners are not named on relevant government lists for individuals or organisations implicated in money laundering, fraud or involvement with prohibited organisations and/or those financing conflict by checking relevant websites, sanction lists and references.
- We will conduct on-site visits if we have concerns or when red-flags are raised and, if confirmed, we will discontinue our activities with this counterparty.
- We will monitor suspicious activity, discuss further steps internally and if necessary report suspicious activity to the proper authorities.
- We will revise our questionnaire, policy and procedures annually during our KYC-management meeting and make adjustments if necessary.
- We will invite all relevant counterparties, with whom we continue doing business, to look into and perhaps refresh their KYC-data and questionnaire every year in January.
- Peter Hemelaer is our assigned KYC-officer.
- All relevant staff at Daems Group BV will be trained on KYC-procedures.
- Our KYC-policy will be shared on the website to create awareness.

Signed for approval by Daems Group BV in January 2026.

