



ANTI-BRIBERY AND CORRUPTION POLICY

Questel

Statement from the Group CEO

Questel is a global provider of tech-enabled professional solutions for managing all types of intellectual assets. Our mission at Questel is to support our clients in succeeding in today's modern knowledge-based economy, by managing their intangible assets in an efficient, secure, and sustainable way.

Given our international presence, we engage with various business cultures and practices which present not only opportunities but also inherent risks, including the risk of corruption.

The Group follows the values of courtesy, honesty, and courage throughout the business cycle. As a result, Questel has zero-tolerance for any acts of corruption. This anti-bribery and corruption policy serves as our guiding framework to ensure that our professional activities align with our core values.

To earn and maintain the trust of our customers, suppliers, and other stakeholders, we are committed to conducting our business in a professional, fair, and lawful manner, while upholding the highest standards of integrity. The Questel Group Management is resolute in its dedication to keeping our employees and stakeholders well-informed about our unwavering commitment to ethical conduct. We are continually enhancing our compliance framework to meet these objectives.

Questel relies on each and every one of you to report any suspected misconduct. We sincerely appreciate your dedication to conducting all business in strict accordance with the Group's ethical guidelines and the anti-bribery and corruption procedure.

Thank you for your unwavering commitment to upholding our ethical standards and ensuring the integrity of our operations.



Charles Besson

Questel CEO

What is the purpose and scope of this document?

The Questel Group (the “Group”) is committed to doing business with integrity. This means avoiding corruption of all kinds, including commercial bribery and bribery of Government Officials.

The Group endeavours to follow all relevant anti-bribery and corruption laws, such as the French Sapin 2 Law, the U.K. Bribery Act (UKBA), the U.S. Foreign Corrupt Practices Act (FCPA), and local laws in all countries where it operates (collectively known as "Anti-Bribery and Corruption Laws"). These laws and the Questel Group Anti-Bribery and Corruption Policy ("Policy") prohibit involvement in corrupt practices.

These guidelines are thus designed to help Questel Group Employees (“Employees”) understand and apply our Anti-Corruption Policy and integrity guidelines. They provide pragmatic information to assist Employees in fulfilling their duties and responsibilities.

The Group expects its clients, vendors, service providers and other third parties to comply with the Policy and the provisions of all Anti-Bribery and Corruption Laws that are in force.

Whom does the Policy apply to?

The Policy applies to all the Employees and entities associated with the Questel Group and its activities. In other words, it applies to all activities related to Questel encompassing Employees, borrowers, beneficiaries, bidders, suppliers, consultants and contractors.

How do we define corrupt and fraudulent practices?

Corruption constitutes the act of offering, promising, giving, requesting, or accepting a bribe or anything of value, whether directly or indirectly, to or from any person or a Government Official with the aim to:

- influence a public decision/ official action.
- induce that individual to perform his or her work duties disloyally or otherwise improperly; or
- secure an undue advantage or a prospect referred to as "Improper Purposes".

Corruption can be divided into three categories for which the Group has zero tolerance:

- active and passive corruption,
- corruption per se and "influence peddling",
- public and private corruption.

Bribery is a form of Corruption aimed at influencing a person's behaviour by means of a financial or other benefit in kind, such as cash payments, charitable donations, lavish gifts and entertainment, investments contrary to human resources policy, granted either to the bribed person or to his or her close family.

Questel does not make any direct or indirect contributions to political parties, politicians, lobby groups, advocacy groups, etc.

The Questel Group pays significant attention to activities that present an increased risk of violating Anti-Bribery and Corruption Laws and provides the necessary guidance on activities such as gifts, invitations, donations, and charitable contributions.

What are facilitation payments?

Facilitation payments are unofficial payments made to a Government Official to facilitate, expedite or secure the performance of routine government actions (e.g. customs clearance, permits, work visas for expatriates, licences, filing and registration of administrative documents, etc.).

These payments may be for non-discretionary, ministerial government actions.

All facilitation payments, regardless of amount, are prohibited under the Policy. Any direct or indirect request for a facilitation payment or any other improper payment should be refused.

Who is responsible for implementing the Policy?

Each Employee plays a vital role in our efforts to combat corruption, and each holds a personal responsibility for upholding integrity within their designated areas of responsibility.

The Group conducts regular audits to ensure that its business activities comply with anti-bribery and corruption laws.

The Group has integrated anti-corruption due diligence into its third party management programmes.

How does the Group mitigate the corruption risk?

As part of its due diligence process, the Group conducts risk-based anti-corruption due diligence on customers, suppliers and third parties, with a particular focus on those located in jurisdictions with high corruption risk.

Anti-corruption compliance clauses and other safeguards are included in contracts in accordance with the Group Financial and Contractual Commitment Policy, which ensures that the interests of each party are respected.

The Group seeks to establish and maintain effective and long-lasting relationships based on trust and mutual respect, paying particular attention to the independence of its third parties.

Who oversees compliance with the Policy?

The Group's Internal Control system is organised around three levels of control:

- **First line** by the operational and functional teams under the supervision of their line management
- **Second line** by functions exclusively dedicated to permanent controls: Group Internal Control Department.
- **Third line** by external auditors.

The control framework is adapted to mitigate against the risks identified in the Group's corruption risk assessment.

What is misconduct, and how is it related to the Policy?

Misconduct includes the failure to observe all the duties of employment. Examples of misconduct include, but are not limited to, fraud, abuse, harassment or alcohol and drug abuse.

What is a conflict of interest?

A conflict of interest occurs when a party possesses interests that may inappropriately impact the execution of their official duties, contractual obligations, or compliance. If an Employee's personal interests or relationships take precedence over our best interests, it constitutes a conflict of interest.

How to report suspected integrity violations?

To report integrity violations, please consult the Questel Group Whistleblower Policy.

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