



**SUPPLIER
DIVERSITY
POLICY**
QUESTEL TRANSLATIONS

Questel

Questel's translation division ("Questel Translations") is a premier, global provider of intellectual property language translation and support services, serving the world's most demanding and sophisticated patent filers in over 200 unique language pairs.

To provide translations that meet our clients' needs, Questel Translations contracts with thousands of suppliers in over 80 countries.

Questel Translations employs and contracts with linguists across the globe, ranging across Asia, Asia Minor, the Pacific, the Middle East, Latin America, Brazil, the Baltics, Scandinavia, Russia, and Europe.

Questel Translations seeks to work with professionally qualified and ISO vetted suppliers with whom quality targets, on-time deliverables, responsiveness, and mutually beneficial pricing can be agree-upon and maintained over time.

Diversity in Supplier Base and Non-discrimination

Questel Translations aspires to recruit the most capable and professional supplier pool in the industry. To facilitate this aim, Questel Translations draws from an incredibly diverse group of individuals and businesses. For Questel Translations diversity among its suppliers is not only good business practice, it is vital to its success!

It is strictly prohibited by Questel Translations' standard of ethics to discriminate against any individuals and businesses, including without limitation those owned by women, minorities, all ethnic and religious backgrounds, and the disabled, in the vetting process, through rate setting, or in the amount of work provided based on factors other than professional and ISO standards as outlined herein.

The following are a few of several recognized supplier diversity classifications; those listed include technical definitions in-part agreed to by Questel Translations in its contractual agreements with its clients.

- Minority Owned Business Enterprise (MBE)
- Small Disadvantaged-Owned Business (SDB)
- HUBZone
- Women-Owned Business Enterprise (WBE)
- Veteran-Owned Business (VET)
- Service Disabled Veteran-Owned Business (SDV)
- Alaska Native Corporation (ANC)
- Indian Tribe

Company policy prohibits discrimination against a person based on the following: race, color, religion, sex (including pregnancy), national origin, age (40 or older), disability, genetic information, sexual orientation, gender identity, or other classifications protected under federal, state, or local laws.

Any inconsistent practices in regards to supplier recruitment should be reported to the Director of Vendor Services.

Locale

Supplier location is key to promoting the diversity of Questel Translations' supplier pool. Using local suppliers helps ensure the integrity of our translations.

Local Suppliers

We use and encourage the use of local suppliers. One of our core criteria is that the supplier should be local to the language they translate. Questel Translations' supplier pool is made up of suppliers from countries, ethnic backgrounds, and religious creeds worldwide.

Local Offices

We maintain offices in several countries. These offices work with local suppliers. Regarding translation work, local offices pull from Questel Translations' diverse pool of suppliers based on the target language need.

Local translation enhances the quality of our work product and is critical to our long-term success.

Solicitations

Recruitment processes help ensure diversity.

World-recognized Recruiting Forums

Questel Translations uses the largest recruiting forums for linguistic suppliers in the world. Through these forums we recruit using two diversification methods:

- Posted Projects. Projects are posted on these forums, allowing all suppliers who feel qualified to apply.
- Targeted Solicitations. Project inquiries are sent to suppliers who meet a select professional criteria. Only professional criteria are used; no personal information is used in this process.

Open Solicitation

We also encourage suppliers to apply who do not participate in industry leading recruiting forums. To do so, suppliers simply apply via email. There are no restrictions on these solicitations. All are welcome to apply.

Questel Translations encourages all interested applicants!

Supplier Evaluation

Questel Translations uses ISO 17100:2015 criteria to evaluate a prospective supplier's qualifications.

Translation Sample Distribution

Samples are distributed for evaluation via Questel Translations' Process Management Platform using the generic designation of VTEST. Supplier location and other diversity-related information is not identified.

Translation Sample Evaluation

Translation samples of potential suppliers are evaluated by other suppliers or inhouse staff who are at a fluent-level proficiency in the language and who are or have been local to the region.

Supplier submissions are evaluated in a professional manner using industry standards and best practices.

Supplier Project Distribution for Selected Suppliers

Project distribution is both criteria and merit based.

Criteria Based

Supplier must first meet the basic professional qualification requirements as outlined within ISO 17000:2015. These criteria were informed by a diverse group of stakeholders.

Merit Based

After passing the professional criteria requirements, suppliers receive work based on the quality of their projects, availability to take work, and responsiveness.

Supplier Self Selection

Translation projects are often distributed using a Kanban model, where suppliers may pull projects as they have the availability for and interest in them.

By using professional criteria, merit, and self-selection models, Questel Translations further ensures the diversity of its key suppliers.

Improvement Targets

Our ISO 9001:2015 certified process requires continual improvement. A current focus in this regard is in helping suppliers improve.

Supplier Summits

Questel Translations plans to increase its use of supplier summits to further train and educate its suppliers. These supplier summits may include global, regional, or local staff who will train suppliers, assisting in their long-term success.

Supplier Feedback

Feedback is critical to maintaining Questel Translations' diverse supplier base. With appropriate feedback, suppliers of all backgrounds can continue to improve.

Questel Translations staff worldwide—a diverse bunch themselves—enjoy, learn from, and are enhanced by our interactions with a wonderful group of suppliers.

Office Applicability:	Corporatewide	Owner Title:	Director – Vendor Services
Dept. Applicability:	Vendor Services	SharePoint Link:	SOP Register

Version Approval: Jeremy Coombs, VP – Operations

Appendix A. Definitions

“Alaska Native Corporation” (ANC) means any Regional Corporation, Village Corporation, Urban Corporation, or Group Corporation organized under the laws of the State of Alaska in accordance with the Alaska Native Claims Settlement Act, as amended (43 U.S.C. 1601, et seq.) and which is considered a minority and economically disadvantaged concern under the criteria at 43 U.S.C. 1626(e)(1). This definition also includes ANC direct and indirect subsidiary corporations, joint ventures, and partnerships that meet the requirements of 43 U.S.C. 1626 (e)(2).

“HUBZone” means a historically underutilized business zone, which is an area located within one or more; (1) qualified census tracts; (2) qualified non-metropolitan counties; (3) lands within the external boundaries of an Indian reservation; (4) qualified base closure area; or (5) redesignated area. HUBZone small business concern (HUBZone) means that it is: (a) at least 51% owned and controlled by 1 or more persons, each of whom is a United States citizen; (b) an ANC owned and controlled by Natives (as determined pursuant to section 29(e)(1) of the ANCSA, 43 U.S.C. 1626(e)(1)); (c) a direct or indirect subsidiary corporation, joint venture, or partnership of an ANC, (d) wholly owned by one or more Indian Tribal Governments, or by a corporation that is wholly owned by one or more Indian Tribal Governments; (e) an SBC that is owned in part by one or more Indian Tribal Governments or in part by a corporation that is wholly owned by one or more Indian Tribal Governments, if all other owners are either United States citizens or SBCs; (f) and other applicable recognized definitions.

“Indian Tribe” means any Indian tribe, band, group, pueblo, or community, including native villages and native groups (including corporations organized by Kenai, Juneau, Sitka, and Kodiak) as defined in the Alaska Native Claims Settlement Act (43 U.S.C. 1601 et seq.), that is recognized by the Federal Government as eligible for services from the Bureau of Indian Affairs in accordance with 25 U.S.C. 1452(c). This definition also includes Indian-owned economic enterprises that meet the requirements of 25 U.S.C. 1452(e).

“Minority-Owned Business Enterprise” (MBE) generally means a small business concern that is (1) at least 51% owned and controlled by one or more members of an identified minority group, (2) a for-profit business concern that physically resides in the United States or one of its territories. “Identified minority groups” are generally defined as having an ethnic background consisting of Asian, Black, Hispanic, East Asian Indian and/or Native American. Ownership by minority group members generally means the business is at least 51% owned by such minority group members or, in the case of a publicly-owned business, at least 51 % of the stock is owned by one or more of such minority group members. In addition, the management and daily operations must be controlled by such minority group members.

“Outlying Areas” means the: (1) Commonwealths of (i) Puerto Rico, and (ii) The Northern Mariana Islands; (2) Territories, (i) American Samoa, (ii) Guam, (iii) U.S. Virgin Islands; and (3) Minor outlying islands, which include, (i) Baker Island, (ii) Howland Island, (iii) Jarvis Island, (iv) Johnston Atoll, (v) Kingman Reef, (vi) Midway Islands, (vii) Navassa Island, (viii) Palmyra Atoll, and (ix) Wake Atoll.

“Service-Disabled Veteran-Owned Small Business Concern” (SDV) (1) Means a Small Business Concern— (i) not less than 51% of which is owned by one or more service-disabled veterans or, in the case of any publicly owned business, not less than 51% of the stock of which is owned by one or more service-disabled veterans; and (ii) the management and daily business operations of which are controlled by one or more service-disabled veterans or, in the case of a service-disabled veteran with permanent and severe

disability, the spouse or permanent caregiver of such veteran. (2) “Service- disabled veteran” means a veteran, as defined in 38 U.S.C. 101(2), with a disability that is service-connected, as defined in 38 U.S.C. 101(16).

“Small Disadvantaged Business Concern” (SDB), consistent with 13 CFR 124.1002, means a Small Business Concern under the size standard applicable to the acquisition, that (1) is at least 51% unconditionally and directly owned (as defined at 13 CFR 124.105) by (i) one or more socially disadvantaged (as defined at 13 CFR 124.103) and economically disadvantaged (as defined at 13 CFR 124.104) individuals who are citizens of the United States; and (ii) each individual claiming economic disadvantage has a net worth not exceeding \$750,000 after taking into account the applicable exclusions set forth at 13 CFR 124.104(c)(2); and (2) the management and daily business operations of which are controlled (as defined at 13 CFR 124.106) by individuals, who meet the criteria in paragraphs (1)(i) and (ii) of this definition.

“Women-Owned Business Enterprise” (WBE), generally means that it is owned, operated and controlled by a woman or two or more women. The business must be a “for-profit” business which physically resides in the United States or one of its territories. Some certifying entities require U.S. citizenship and other certifying entities accept legal residency. Ownership by women means the business is at least 51% owned a woman or group of women. In the case of a publicly-owned business, at least 51% of the stock is owned by one or more women. Further, the management and daily operations are controlled by those women.