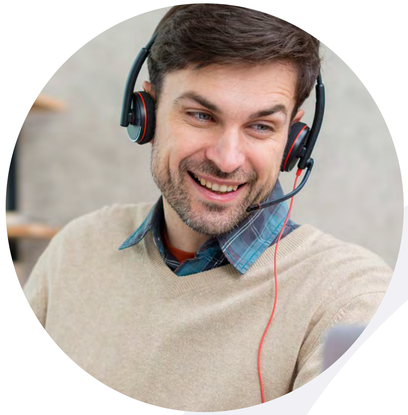
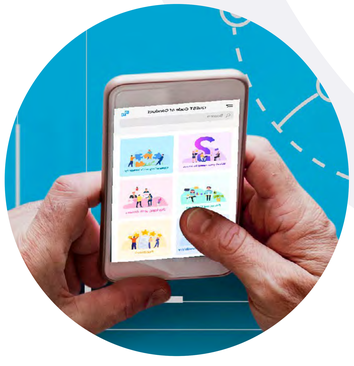
QuEST
BORN TO ENGINEER





QuEST Code of Conduct

Let's Begin

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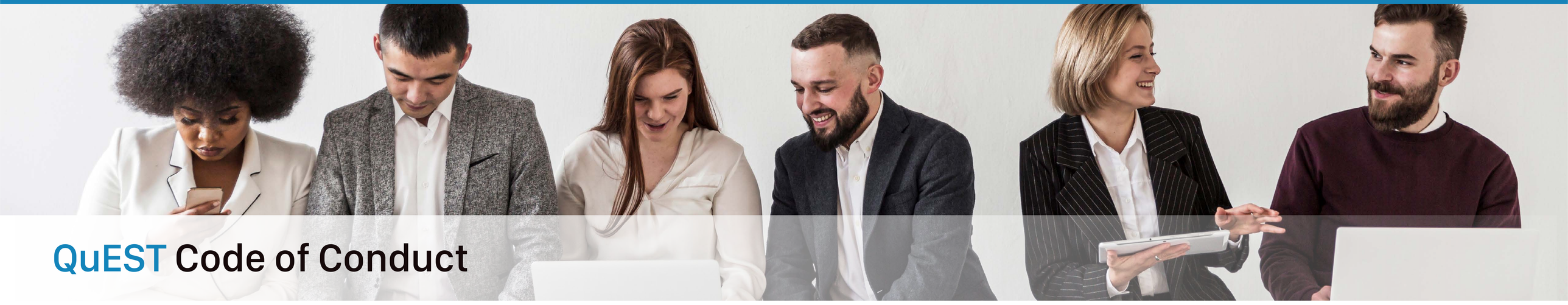

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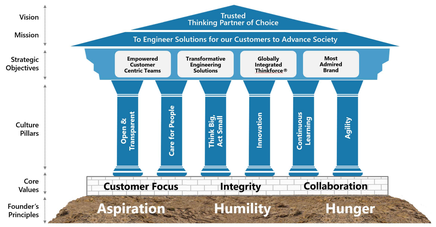
Introduction

QuEST has a vision to be the 'Trusted Thinking Partner of Choice' for our Customers; to achieve this everyone must play their part, operate at their best and make good decisions guided by the Founder's Principles, Core Values and Culture Pillars detailed in the QuEST Architecture:-



The choices we make and the things we do must be guided by this architecture so that our Customers, Employees, Partners, Suppliers and other Stakeholders trust us to operate with Integrity and within the framework of the law, regulations and the obligation & standards we have contracted to abide by. All of which is detailed in the QuEST Quality Management System (QMS).

From time to time we all need a little help to do the right thing, no matter the dilemma we face, the location & culture we are in, or the job that we are performing. This Code of Conduct has been written as a guide to help support us and to build an ethical and compliant culture across QuEST.

The Code of Conduct applies to all of us in QuEST, including the colleagues that join us as we grow the business and embrace newly acquired companies.
It applies to all equally, from the Board Room to the Delivery Centers and across the Enabler Functions.

It is everyone's responsibility to uphold the QuEST Architecture and the Code of Conduct, and safeguard our Reputation, Professionalism and Ethical Standards.

We all have the following accountabilities:-

- To be directly accountable for our actions.
- To be aware of the impact we have on the business and our colleagues, and to uphold the highest standards of professionalism and integrity.
- To consider how our decisions and actions affect others around us, and to offer help and support if needed.
- To create an environment in which everyone is safe, honest and compliant with this Code of Conduct.

We must make sure that:-

- We are open to receiving new improvement ideas, concerns or criticism and take this forward positively and appropriately.
- We treat people respectfully, fairly and without prejudice; particularly those who speak up.
- We must all follow this Code and the Policies and Processes detailed in the QuEST Quality Management System (QMS).
- We must always complete the mandated training on-time.
- We regularly review the relevant Code of Conduct topic in our team meetings.
  This guide is based on the Code of Conduct Policy document in QMS – HUM-GUD-209.

Message from the CEO

Dear Questians,

As we look back, we can take pride on several remarkable achievements we have had during the past 20+ years. We can see how we built this organization from the Founder's Principles and our Core Values as the base, each pillar of our culture strengthening it, with our organizational DNA interwoven into the structure. This Code of Conduct provides us with the resources and the information we need to operate our business responsibly and make ethical decisions to maintain trust. Trust is the foundation of our profession.
We always do the right thing because honesty and integrity go hand-in-hand.

This document is a blueprint of the celebrated Founder's Principles, QuEST Values and Culture Pillars. Our values are a set of shared beliefs and practices that have not only helped us attract amazing people, but also amplified their ability to help them do the best work.

We encourage you to carefully read through the Code and use it to guide your actions here. Strive to do well in all that you do and remain true to QuEST's proud legacy.

Best Regards,
Ajit Prabhu
CEO & Chairman

QuEST Code of Conduct

This Code of Conduct supports our values and behaviours and expands upon the principles by which we must operate in order to navigate the different business dilemmas we may encounter at work.

Through this Code of Conduct Guide we aim to provide a framework to achieve:-

- Compliance with applicable laws, regulations and customer requirements
- Honest and ethical conduct, including fair dealing and the ethical handling of actual or apparent conflicts of interest
- Prompt internal reporting of any violations of the Code
- Accountability for adherence to the Code of Conduct, including fair process by which to determine violations
- Consistent enforcement of the Code, including clear and objective standards for compliance
- Protection for persons reporting any questionable behaviour
- The protection of the Company's legitimate business interests, including its assets and corporate opportunities
- Confidentiality of information entrusted to QuEST by the company and its customers
- Full, fair, accurate, timely and understandable disclosure.

Consequences

- Failure to follow this Code is a disciplinary matter, and in certain cases may result in dismissal.

Speaking Up

Having the confidence to 'speak-up' is a key factor in building an ethical culture, it's only by creating an open and trusted environment that any organisation can hope to encourage open disclosure of the issues affecting employees and our own conduct.

We 'speak up' when we:-

- Witness, or are subject to bullying, harassment or discrimination at work
- Suspect loss, misuse or theft of QuEST's assets
- Experience, witness or otherwise become aware of a violent or potentially violent situation that occurs on the Company's property, or affects the Company's business
- See a conflict of interest due to a business decision made based on personal relationships/benefits, that is against the best interest of the Company
- Suspect bribery, corruption, fraud or other criminal offences
- Have suspicions of anti-competitive practices
- Witness or are aware of modern slavery practices within the Company
- Have concerns about health, safety and security issues for self and others
- When we see or are subjected too sexual harassment
- Have concerns about how personal data is being handled.

How to speak up:-

- If you believe that you have been discriminated against, harassed or not given equal opportunities at work, please report this at http://speakup.quest-global.com/
- Any suspected loss, misuse or theft of QuEST's assets, please report this at http://speakup.quest-global.com/
- If you experience, witness or otherwise become aware of a violent or potentially violent situation that occurs on the Company's property or affects the Company's business, please report this at http://speakup.quest-global.com/. **HOWEVER**, if this is an active emergency situation contact the local authorities instead immediately.
- If you see a conflict of interest due to a business decision made based on personal relationships/benefits, that is against the best interest of the company, please report this at http://speakup.quest-global.com/

Operate with Integrity

Integrity is one of QuEST's core values, we must always do the right thing and act with honesty, comply with the law and live up to our ethical standards by being true to ourselves and showing good judgement in all that we do.

Quality Assurance

ISMS Compliance

Health, Safety & Environment

Quality Assurance

Keep following the policies and procedure to maintain our quality services to the customer.

Principles:-

- Operating in accordance with the Policies and Procedures in QuEST Quality Management System (QMS), recognize that this is fundamental to our business performance and our ability to deliver product and services that conform and meet the customer expectations.

We will:-

- Fully comply with the requirements detailed in QuEST QMS, and strive to meet the standards defined by our customers and the regulatory authorities
- Work together and actively identify, promote and encourage ways to continually improve the way we work.

ISMS Compliance

The goal of the Information Security Management System (ISMS) is to minimise both physical and virtual security risks on the business by being pro-active and introducing appropriate policies, controls and processes to protect individuals and data.

Principles:-

- Compliance with Information Security and Management Systems (ISMS) policies and processes is fundamental to safe business practice and the security of our data and information, and that of our Customers.

We will:-

- Fully comply with all ISMS policies, processes and practices defined in QuEST QMS.

Health, Safety & Environment

The health and safety of our employees and their families is a primary concern for QuEST, as is the protection of the environment within which we all live.

Principles:-

- The safety of our Employees is paramount; QuEST take positive action to ensure that its facilities and any equipment it provides comply with all local Health & Safety laws and regulations.
- QuEST promotes Employee well-being as a key factor in its success.
- QuEST assesses and mitigates the health and safety impact of its existing and new activities, or project, design and production of products & services.

We will:-

- Comply with all applicable environment and related laws, regulations, codes of practices and other requirements.

Personal Conduct

Operating in a professional manner, adhering to Company policies and procedures, whilst working together as a team is critical to maintain QuEST's high standards and ensure fair and consistent practices, with legal and regulatory compliance. Each and every individual has a responsibility to behave in such a way that is not detrimental to the integrity of the Company.

Dealing with Conflicts of Interest

Anti-Bribery & Anti-Corruption

Protecting Company Assets

Export Control

Drug, Alcohol and Weapon Abuse

Intellectual Property

Dress Code and Appearance

Use of QuEST Brand and Marketing

Concurrent Employment

Personal Communications

Dealing with Conflicts of Interest

A ‘conflict of interest’ can arise whenever an Employee or a Director takes action or has an interest that prevents them from performing their duties and responsibilities honestly, objectively and effectively.

Principles:-

- All QuEST Employees and Directors will act in the best interest of the Company and refrain from engaging in any activity that might result in, or give the appearance of, a ‘conflict of interest’ that compromises the integrity of QuEST, or their own role and responsibilities.
- QuEST Directors and Executive Officers will not serve as a consultant, associate, officer, member of the Board of Directors, advisor or in any other capacity for a Customer, Supplier or Competitor of QuEST.
- The Company’s Whistle-blower Committee or the Board, will review all potential or actual ‘conflicts of interest’ issues raised, and communicate how best to address that conflict.
- We will work within all laws and regulations in regard to the employment of former government and military personnel, customers and competitors.

We will:-

- Act honestly, objectively and effectively, conducting business solely in QuEST’s best interests and not based on personal relationships or benefits
- Avoid situations where a ‘conflict of interest’ might be seen to influence a business decision or behaviour, or which might stop us from acting in the best interest of QuEST
- Speak up if we believe there is, or might be a ‘conflict of interest’ and seek help and support
- Disclose in writing to the ‘Whistle-blower’ Committee (or the Board if a Director) any situation that may give rise to a ‘conflict of interest’ or any financial interest held by themselves of an immediate family member
- Advice Senior Management if we become involved in a personal relationship with a direct or indirect colleague at work
- Not make or influence any decision on behalf of QuEST that could directly or indirectly benefit a family member who has a significant financial interest in a transaction with a competitor or a supplier.

Anti-Bribery & Anti-Corruption

'Business Courtesies' such as gifts and hospitality are occasionally given or received from Customers, Suppliers and other Partners or external Stakeholders, and used to build goodwill and acknowledge appreciation in business relationships. These 'courtesies' must always be appropriately limited and reflect 'good judgement' and should not attempt to influence, or give the appearance of influencing, any business decision, and must always be permissible and within the recipients own policy and the law.

Principles:-

- We do not tolerate bribery and corruption in any form.

  We do not offer, give or receive 'anything of value' that could be seen as inappropriate, improper, or to influence a business decision.

- We only work with people and organisations who mirror our values and whose conduct meets our standards at all times.

- The term 'anything of value' includes cash payments, gifts, excessive entertainment, excessive business promotional activities, covering or reimbursing expenses of a person, in kind or political contributions, investment opportunities, shares securities or loans

- QuEST and its employees will neither receive nor offer or make, directly or indirectly, any illegal payments, remunerations, gifts, donations or comparable benefits that are intended, or perceived, to obtain uncompetitive favours for the conduct of its business.

- QuEST shall cooperate with government authorities in efforts to eliminate all forms of bribery, fraud and corruption.

- Contractual rights, promise of future employment, payments under consulting agreements, subcontracts stock options, and similar items of value provided to a person.

We will:-

- Not give or receive bribes
- Report all incidents or offers of bribery to Senior Management
- Only offer gifts or hospitality in line with the guidance in the QuEST Code of Conduct
- Consult a Senior Management if we suspect un-ethical behavior before engaging with any new Partner, Customer or Supplier.
- Always exercise good judgment, discretion and prudence when providing gifts and hospitality to Customers, Suppliers and other Partners or external Stakeholders; only offer appropriate 'business courtesies' within the local law, and within the recipient's own company policy and guidelines.
- Receive and offer only appropriate gifts of a nominal value, or of a commemorative (QuEST Branded) nature to Customers, Suppliers and other Partners or external Stakeholders as 'business courtesies'. Gifts received that do not comply with this policy must be declined or accepted and immediately disclosed to a member of the Leadership Team for approval or quarantine.

Protecting Company Assets

Taking individual responsibility for safeguarding Company assets which are vital to our business and protecting them from unauthorised access/theft, inappropriate use and/or disclosure is critical in protecting the Company's financial investments and operational efficiencies. This includes the awareness and protection of assets belonging to QuEST's customers, suppliers and business partners.

Principles:-

- QuEST assets include all physical property, intellectual property of QuEST or its customers, including all communication devices and software, as well as all proprietary and confidential information. This also includes any data and communications transmitted or received by and contained in QuEST's systems.
- The theft, misuse or carelessness of QuEST funds or assets, including data, for any unlawful or improper purpose is prohibited.
- To the extent permitted by law, QuEST reserves the right to monitor all electronic and telephonic communication and that these communications may also be subject to disclosure to law enforcement or government officials.

We will:-

- Only use QuEST assets to conduct official QuEST business, for the propose with which the asset was intended, and for legitimate business purposes only
- Be responsible, safeguarding and protecting the tangible and intangible assets of QuEST from misuse, theft, fraud, damage or loss
- Report the loss or misuse of any QuEST assets to a QuEST Manager without delay, or to HR - **Email: HR-Policy@quest-global.com**

Export Control

QuEST is committed to fully comply with all national export control requirements and regulations within the regions it operates.

Principles:-

- As a global company, QuEST provides services to customers all over the world. QuEST also purchases services from a diverse group of Suppliers. It is therefore critical that QuEST fully comply with all applicable legislation and regulation that govern our export activities.
- Before engaging in any export activity, every Employee must verify the eligibility of both the delivery location and the recipient. He/she must also ensure QuEST has all the required licences and permits, including government licences or approvals for government-controlled products or technologies.
- QuEST follows a well-defined and comprehensive Export Control Compliance System managed by the Business Excellence Function who are committed to obtain Export Licences and permissions from the relevant National Export Control Authorities.

We will:-

- Make sure that we understand and act in accordance with the laws and regulations that apply to any export we make, both tangible and intangible; this includes the laws of other countries when making an export
- Commit to taking the relevant annual Export Control training for the country we operate from
- Commit not to travel across national boundaries with controlled technologies (tangible or intangible) without first obtaining approval from the Export Control Team and making the required customs/import declarations.

Drug, Alcohol and Weapon Abuse

The primary purpose of this policy is to promote the safety and wellbeing of all employees.

Principles:-

- QuEST will maintain a healthy, productive and safe work environment free from drug, alcohol, violence, threats of violence and weapons abuse.

  Substance abuse, or selling, distributing, possessing, using or being under the influence of drugs or alcohol while at work is absolutely prohibited.

- Drinking alcohol is prohibited while on duty or on the premises of the Company, except at specified company-sanctioned events or as otherwise authorized by senior management.

- The Company will not tolerate violence or threats of violence in, or related to, the workplace.

We will:-

- Never possess, sell, purchase, distribute or be under the influence of illegal drugs while at work or conducting QuEST Business
- Never report for work or conduct QuEST Business, including driving, while being under the influence of drugs or alcohol
- Never report to work or conduct QuEST Business whilst possessing a firearm or a weapon
- Refrain from threatening behavior or conducting any form of violence at work (including driving) or whilst representing QuEST.

Intellectual Property

We should respect our national and international property and copyrights rules for securing and enforcing the legal rights of our company and customers strictly follow our instructions to protect the exclusive control of intangible assets.

Principles:-

- QuEST respects and upholds National & International Intellectual Property and Copyright laws, and as an ethical and responsible company will protect all data, intellectual property, trade secrets and other confidential information owned by QuEST and its Customers.
- QuEST respects and upholds the Intellectual Property Rights of others and will only use such material in accordance with the terms of a valid license.
  QuEST recognises that unauthorized receipt or use of the intellectual property may expose QuEST to civil lawsuits and damages.

We will:-

- Identify and protect intellectual property, trade secrets and other confidential information owned by QuEST and its Customers, recognising that this is critical to our business
- Always comply with the requirements of software copyright licenses related to software packages, including the use of 'open source code'
- Not use materials that are under 'copyright' without appropriate permission from the owner, and will always consult the Legal Department whenever an IPR issue is involved if not clear on the course of action to be taken.

Dress Code and Appearance

Presenting a professional appearance is essential to the Company's image and reputation, which portrays the ethos of the Company and impacts our success.

Principles:-

- When working, employees will dress and attend to personal grooming in a manner to professionally represent QuEST.

We will:-

- Dress appropriately and in a manner consistent with the nature of the work to be performed
- Follow QuEST Dress Code guidelines made available on the intranet or employee handbook, for each country of operation.

Use of QuEST Brand and Marketing

Protecting the QuEST brand is essential in order to secure the value and reputation of the Company; we are all accountable for this by strictly following the QuEST trademark/brand guidelines.

Principles:-

- Respect that QuEST® is a registered trademark of QuEST Global Inc, with worldwide registration, and that the use of that name and trademark is restricted to employees only.
- No third party or joint venture shall use QuEST trademark or brand without specific authorization from the QuEST Head of Marketing.
- QuEST places a high value on its credibility and reputation in the community. What is written or said about the Company in the news media and investment community directly impacts our reputation, positively or negatively. Our policy is to provide timely, accurate and complete information in response to public requests through dedicated personnel, consistent with our obligations to maintain the confidentiality of competitive and proprietary information, and to prevent selective disclosure of data.
- No person other than the members of Marketing team, Investor Relations team and other authorised persons shall attempt to speak, share or communicate any non-public information regarding QuEST with the media, analysts, investors or other individuals external to QuEST.

We will:-

- Use the QuEST logo and brand in accordance with QuEST Marketing guidelines
- Maintain and uphold the dignity of the QuEST name and brand.
- Not speak to the media, politicians or members of the investment community about our business unless we have been given authorisation to do so.
- Refer any enquiry from the media or investor community to the Head of Marketing.
- Ensure that all statements to the media are accurate and fair, and that all marketing materials and advertisements are ethically compliant, legitimate and do not misrepresent, deceive or be likely to mislead.

Concurrent Employment

Concurrent employment occurs when an employee has more than one employment contract simultaneously; a full and open declaration must be made and prior consent must be obtained from QuEST.

Principles:-

- Before engaging in any concurrent employment or freelance consultancy, a QuEST employee will first openly discuss that opportunity with QuEST HR Team.

We will:-

- Not seek to be employed or provide freelance services to another company (paid or unpaid), without obtaining written agreement from QuEST by writing to **HR-Policy@quest-global.com**, or for Senior Executives obtaining approval from the Board.

Personal Communications

Personal data is anything that could be used to identify someone, either directly or indirectly. We should not disclose sensitive or proprietary business information about our company, our customers, suppliers, or other business partners outside our organization unless there is a valid & legitimate reason to do so.

Principles:-

- We are all representatives of QuEST and the actions we take at work or when representing QuEST online create an impression and a long-lasting footprint. Employees are therefore encouraged to conduct themselves in a responsible, respectful and honest manner at all times, in both the physical and virtual worlds.
- The Company understands that employees may wish to present themselves as QuEST and maintain a personal presence online using approved forms of social media. However, in doing so employees should include a disclaimer that the views expressed therein do not necessarily reflect the views of the Company.

We will:-

- Not disclose confidential, proprietary, sensitive or trade secret information belonging to QuEST or our Customers, Partners, Suppliers or any other Third Party
- Not express or solicit a political view or provide links to such websites.

Working with Others

QuEST expects that all employees and directors will conduct themselves in a professional manner when interacting with others and managing colleagues. We must all work co-operatively and in an appropriate and fair manner to achieve business objectives. 'Working with others' includes our behaviour when face to face and during all other forms of communication, including written and e-mail, telephone or through social media; it encompasses our interaction with all of our colleagues (regardless of their position within the organisation) and with all of our customers, suppliers and business partners.

Equal Opportunities, Discrimination & Harassment

Privacy and Confidentiality

Records Management

Audits and Investigations

Immigration and Labour laws

Meeting with Competitors

Equal Opportunities, Discrimination & Harassment

QuEST has a policy to provide equal employment opportunities, and to administer its personnel practices and maintain an environment free of discrimination or harassment on the basis of a person's actual or perceived 'protected characteristics' such as disability, race, religion, sexual orientation or identity.

Principles:-

- QuEST is committed to providing equal opportunities and fair treatment to all individuals on the basis of merit, without discrimination because of race, colour, religion, national origin, sex (including pregnancy), sexual orientation, age, disability, veteran status, or other characteristics protected by law.
- QuEST considers harassment as unlawful.
- QuEST condemns favouritism or the appearance of favouritism at the workplace.

We will:-

- Not tolerate favouritism, discrimination and harassment of any kind and will speak up if we witness or are personally subjected to such behaviour.

Privacy and Confidentiality

Employees are required to keep company and personal information private. Confidentiality is about protecting data against unintentional, unlawful, or unauthorized access, disclosure, or theft.

Principles:-

- Employees and directors have a duty to safeguard all confidential information of the Company or third parties with which the Company conducts business, except when disclosure is authorized or legally mandated.
- "Confidential information" includes QuEST's trade secrets, inventions, computer programs and related data and materials, in hardcopy or electronic format.
- Third Parties may also furnish information to QuEST concerning their respective business affairs, finances, properties and methods of operation, or other data which is not in the public domain and which is proprietary or confidential.
- QuEST is committed to protecting business and personal information of a confidential nature obtained from clients, Employees and Associates.

We will:-

- Take appropriate precautions to ensure that confidential or sensitive business information is only discussed with relevant employees and directors
- Never accept information offered by a third party that is represented as confidential, unless an appropriate nondisclosure/confidentiality agreement has been signed
- Take every precaution to keep confidential information in accordance with the Information Security Management System (ISMS) Information Classification & Information Exchange Policy
- Protect the reputation of QuEST, its Employees and its services/products at all times.

Records Management

QuEST's 'records management' procedures must be adhered to and the processes of collection, organisation, classification and secure storage must be fully implemented to facilitate appropriate and authorised retrieval, use, preservation and disposal.

Principles:-

- QuEST's shareholders, business partners and regulatory authorities rely on the accuracy and correctness of the information contained in QuEST's business records; all records must be kept up to date and accurate.
- All QuEST Employees are expected to maintain and/or destroy documents in accordance with the records retention schedules and procedures put in place by respective QuEST internal policies, as per the regulations in each country of its operations.

We will:-

- Ensure that information provided is accurate, timely, complete, fair and comprehensible
- Maintain and/or destroy documents in accordance with the records retention schedules and procedures as per policy.

Audits and Investigations

QuEST welcomes the independent examination of its systems and procedures, through both internal and external audit and investigation.

Principles:-

- QuEST Employees are expected to cooperate with investigations conducted by legitimate authorities. Any visit from a public official that relates to an investigation or inquiry must be coordinated by the Corporate Secretary and the Legal department.

We will:-

- Practice transparency and cooperate with investigations conducted by legitimate authorities.

Immigration and Labour laws

QuEST professionally and ethically manages the recruitment and employment of human resources, in accordance with and in strict adherence to employment-based immigration and labour laws.

Principles:-

- QuEST is committed to abide by all immigration laws/policies of respective countries.

  QuEST is aware of the social reality of the existence of child labour, which it does not support and furthermore insists its suppliers have a no child labour policy in place.

- QuEST has a zero-tolerance approach to modern slavery, both within the organisation and its supply chains. The detection, reporting and prevention of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for the Company, or working on behalf of QuEST.

- QuEST supports the use of legitimate workplace apprenticeships, internships and other similar programs that comply with all laws and regulations applicable to such programs.

We will:-

- Follow the guidelines issued by the Global Mobility Team to ensure full compliance with the relevant immigration laws.

- Not engage in, facilitate or fail to report any activity that might lead to, or suggest the use of child labour or modern slavery practices.

Meeting with Competitors

When meeting with competitors, QuEST ensures that there is a legitimate purpose for meeting and that caution is exercised to be transparent and clear that anti-competitive activity will not be tolerated.

Principles:-

- Meetings with competitors may give rise to the appearance of impropriety. It is recommended that you meet with competitors in a closely monitored, controlled environment and circulate agendas and document minutes.

We will:-

- Exercise caution and obtain the prior approval of Unit/Departmental Head, or an executive officer of the Company if we are required to meet with a competitor.

Corporate Responsibility

Corporate Social Responsibility & National Interests

Corporate Opportunity and Statutory Compliance

Competition Law, Intermediaries and Third-Party Representation

Government and Political Activities

Antitrust and Corruption Compliance

Quest Records and International Trade Law

Corporate Social Responsibili ty & National Interests

By practicing Corporate Social Responsibility (CSR), QuEST is conscious of the impact it is having on all aspects of society, including economic, social and environmental factors.

Principles:-

- Conduct business that achieves a balance or integration of economic, environmental and social imperatives whilst also addressing stakeholder expectations.
- National Interests: QuEST is committed to benefit the economic development of the countries in which it operates.
- Strive to promote awareness of our broader CSR both directly and indirectly through our suppliers and ethical business partners.

We will:-

- Consider, respect and act upon the integration of marketplace, workplace, environment and community concerns with business operations.
- In the course of our business activities, respect the culture, customs and traditions of each country and region we operate in, and conform to all trade procedures, including licensing, documentation and other requirements, in accordance with the law.

Corporate Opportunity and Statutory Compliance

QuEST prides itself on conducting its business in full compliance with statutory regulations and professional standards.

Principles:-

- QuEST is committed to corporately lead by example and reinforce the adherence to all labour, immigration, equal opportunities, discrimination and harassment laws, and uphold the Company's employment policies at all times.
- All Employees and Directors of the Company have an obligation to advance the Company's interests. If they discover or are presented with a business opportunity through the use of corporate property or information, or because of their position with the Company, they should ensure the opportunity is advanced through the Company.

We will:-

- Consciously be aware of the employment ethos of the Company in its entirety
- Encourage the detection, reporting and prevention of any breach of Company employment policies.
- Not use corporate property, information or position in the Company for personal or another's gain
- Declare up to date Pecuniary Interests.
- Always seek advice from management if there is ever any uncertainty or doubt about how to comply with a statutory law or regulation.

Competition Law, Intermediaries and Third-Party Representation

An Intermediary is a third-party company or person who can mediate between a buyer and a seller to facilitate a deal, or who offers to provide access to a person who can favourably facilitate a deal. QuEST implements a consistent and clear approach towards the use of such intermediaries.

Principles:-

- QuEST will only support the use of third-party agents or intermediaries when there is a clear business case to do so, and the intermediary's credentials and reputation have been verified and contracted.
- All employees deal fairly with other fellow employees and with the Company's vendors, licensors, customers, suppliers and competitors.
- Parties which have business dealings with QuEST, but are not members of the group, such as consultants, agents, sales representatives, distributors, channel partners, contractors and suppliers, shall not be authorized to represent QuEST without written permission from the QuEST.
- QuEST is committed to fair competition and honest, straightforward business dealings.
- QuEST abides by antitrust and competition laws.

We will:-

- Be alert and fully investigate any 'Red Flags' that may be encountered during verification of, or in transaction with, any third-party agent or intermediary, and ensure that any issue is immediately escalated to Senior Management and appropriately addressed.
- Deal fairly with other fellow employees and with the Company's vendors, licensors, customers, suppliers and competitors.
- Exercise caution when speaking with representatives of QuEST's competitors to avoid even the appearance of anti-competitive practice
- Not obtain competitor information by disreputable means
- Abide with local employment laws and not enter into anti-poaching agreements
- Not discuss prices, ongoing bids, terms and conditions of sales, market share, costs or profit margins with competitors.
- If requested, sign a Non-Disclosure Agreement with third parties to support confidentiality of information.
- Not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice.

Government and Political Activities

Whilst adhering strictly to government regulations, QuEST is impartial and has no political affiliation.

Principles:-

- QuEST will comply with government procurement regulations and shall be transparent in all its dealings with government agencies.
- QuEST is committed to conducting its business with all governments and their representatives with the highest standards of business ethics and in compliance with all applicable laws and regulations.
- QuEST will always be committed to and support the constitution and governance system of the country in which it operates and will not support any specific political party or candidate for political office.
- QuEST funds or assets will not be used to make a political contribution to any political party or candidate.

We will:-

- Not offer or give any company funds or property as a donation to any government agency or its representative, directly or through intermediaries, in order to obtain any favourable performance.
- When required, understand and comply with the law, rules and regulations that apply to our role, and fully comply with any standard operating procedures that the Company has implemented.
- Respect and not attempt to influence or sway the Company's position on non-political alignment.
- When participating in any political activity, make it clear that any views and actions expressed are your own, and not made on behalf of QuEST.

Anti-trust and Corruption Compliance

At all levels, QuEST will not conduct business in such a way as to violate anti-trust and anti-corruption laws.

Principles:-

- QuEST policy is to compete vigorously and ethically while complying with all antitrust, monopoly, competition or cartel laws in all countries, states or localities in which the Company conducts business.
- QuEST is committed to complying with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act in the United States, the UK Bribery Act 2010 in the United Kingdom, the Prevention of Corruption Act and the Corruption, Drug Trafficking and Other Serious Crimes (Confiscation of Benefits) Act in Singapore, the Prevention of Corruption Act 1988 in India and other applicable anti-corruption laws.

We will:-

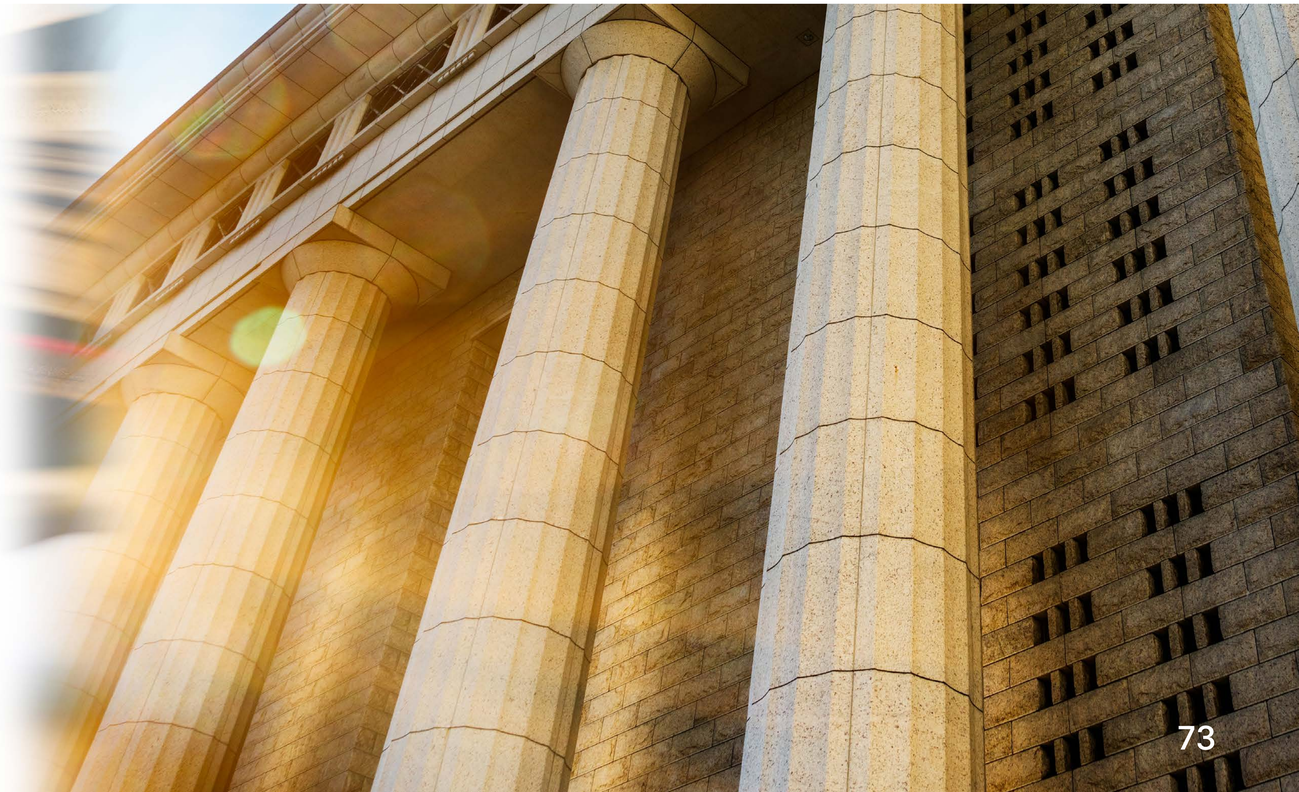
- Maintain a basic familiarity with the anti-trust principles applicable to our activities, and if in any doubt seek advice from QuEST Legal Department.
- See Personal Conduct Section.

QuEST Records and International Trade Law

QuEST is committed to comply with all applicable laws and regulations regarding International Trade Controls, Anti-boycott and Counterterrorism.

Principles:-

- Accurate and reliable records are crucial to our business, including financial records, personnel records, records relating to our products & services, regulatory submissions and other records maintained in the course of our business, will all be maintained in accordance with the Singapore Companies Act.
- Directors of QuEST must become fully familiar with the Singapore Companies Act.
- Attending meetings of professional organizations and trade associations is both legal and proper if such meetings have a legitimate business purpose and are conducted in an open fashion.
- The Directors of QuEST will fully comply with the requirements of the Singapore Companies Act.

We will:-

- All strive to contribute, update and maintain accurate records, including time sheets, invoice or expense reports, product, marketing or administrative activities, or performance evaluations; all of which could affect the reported financial condition or results.
- Advise Line Management when attending meetings of professional organizations and trade associations
- Exercise caution and refrain from discussing QuEST pricing or employment policies, other competitive terms, or any other proprietary, competitively sensitive information at such meetings.
- In regard to International Trade and where the role demands, maintain a basic knowledge of, and comply with International Trade laws and regulations for the countries where QuEST operates.