

Supplier Code of Conduct

Purpose

Quest Global Services Private Limited (Singapore), each of its divisions, business units and subsidiaries (collectively “Quest Global”) is committed to the highest standards of ethical behavior and integrity in our business. Our Suppliers are critical to our success and our ability to provide superior services in a responsible manner. This Supplier Code of Conduct (the “Code”) sets forth our expectations for our Suppliers. Quest Global expects that our Suppliers will have their own internal codes of ethics and conduct. This Code is not intended to be an exhaustive list of all ethical and business conduct requirements to be followed by Suppliers. You are responsible for ensuring that your directors, officers, employees, representatives, and business partners understand and comply with the expectations set forth in this Code.

General Disclaimer: The expectations set forth in this Code are not intended to conflict with or modify the terms and conditions of your contracts with Quest Global. If a contract requirement is more restrictive than this Code, you must comply with the more restrictive contract requirement.

Scope

This Supplier Code of Conduct is applicable to all contingent workers, vendors, agents, contractors, and sub-contractors (individually referred to as a “Supplier”) engaged by Quest Global.

1. Legal Compliance

At a minimum, Suppliers shall comply with all applicable legal, statutory, and regulatory requirements under the jurisdiction in which the Supplier operates.

2. Confidentiality and Intellectual Property Rights

Suppliers must respect the legitimate proprietary rights and intellectual property rights of Quest Global and others. Suppliers must take proper care to protect sensitive information, including confidential, proprietary and personal information. Suppliers should not use sensitive information for any purpose other than the purpose for which it was provided, unless the owner of the information has provided prior authorization.

3. Anti-Corruption and Anti-Money Laundering

Suppliers shall comply with all applicable laws against bribery, corruption, inaccurate books and records, inadequate internal controls and money-laundering, including but not limited to, the Foreign Corrupt Practices Act of 1977. Suppliers must not pay a bribe in any amount, to anyone, anywhere, for any reason whatsoever, whether on Quest Global’s behalf, your behalf, or on behalf of others. Suppliers must never offer, promise, authorize, or provide, directly or indirectly, anything of value with the intent or effect of inducing anyone (including a Quest Global customer, Quest Global employee, or other supplier) to forego their duties and providing an unfair business advantage to Quest Global, you, or others. This includes facilitating payments (e.g., payments to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance).

4. International Trade Requirements

Suppliers must conduct business in strict compliance with all applicable laws and regulations governing the: export, re-export and retransfer of goods, technical data, software and services; the import of goods; economic sanctions and embargoes; and U.S. antiboycott requirements.

5. Competition on The Merits and Fair Dealing

Suppliers shall compete strictly on the basis of the merits of its products and services. Supplier shall comply with applicable competition laws.

Suppliers must deal honestly and ethically and shall not take unfair advantage through manipulation, concealment, abuse of privileged or otherwise undisclosed information, misrepresentation of material facts or any other unfair-dealing practices, whether on Quest Global's behalf, Supplier's behalf, or on behalf of others.

6. Labor and Human Rights

Suppliers shall comply with all local labor laws and regulations and maintain updated records. Upon request, Supplier shall produce to Quest Global all relevant documentary evidence supporting its compliance to applicable labor laws and regulations.

Suppliers shall provide equal opportunity of employment and shall not discriminate against any employee or applicant for employment on the basis of race, color, sex, sexual orientation, religion, national origin, age, disability, veteran status, or any status protected by applicable local laws.

Suppliers shall not (i) employ or support use of child labor and child exploitation, or (ii) engage in any form of forced, compulsory or illegal labor, including trafficking, prison labor, or bonded labor.

Suppliers must develop and implement policies and procedures to ensure that employees may perform their work in an environment free from physical, psychological or verbal harassment or intimidation, or any other form of abusive conduct.

Suppliers shall pay minimum wages, comply with the maximum number of working hours, and provide other employment related benefits as required under applicable law.

7. Business Integrity

Suppliers shall avoid all conflicts of interest that may adversely influence business relationships and shall disclose any actual, perceived, or potential conflict that might arise when loyalties are divided among Supplier's interests and those of Quest Global.

8. Environment Protection

Suppliers shall comply with all applicable environmental, health and safety laws, regulations and directives. Suppliers must conduct operations in a manner that: actively manages risk; conserves natural resources; prevents pollution; safeguards the environment; and minimizes waste, emissions, and energy consumption.

9. Health and Safety

Suppliers shall provide a safe and healthy working environment for its employees, agents, contractors, sub-contractors and affiliates and take practicable steps to prevent accidents and injuries. Suppliers must have adequate health and safety insurance policies based on the nature of the business and shall implement procedures and systems to manage, track and report occupational injury and illness.

Suppliers shall have policies and procedures in place to ensure that employees do not conduct work while under the influence of alcohol, illegal drugs, or misused medications, whether prescription or non-prescription. Suppliers shall implement and enforce policies and procedures that prohibit employees from using, possessing, or selling illegal drugs, alcohol, or misusing medications while performing job functions.

10. Subcontractors

If a Supplier's contract with Quest Global permits it to assign, delegate, or subcontract its obligations or procure products or services from others that will be incorporated in products or services acquired by Quest Global, we expect the Supplier to carefully select its business partners, and perform due diligence, audit, and oversight to prevent and detect misconduct. Suppliers must flow down the principles set forth in this Code to these business partners and we will hold a Supplier responsible for ensuring compliance by its business partners.

11. Reporting Misconduct and Non-Retaliation

We expect Suppliers to provide employees and business partners with access to adequate reporting channels to raise legal or ethical issues or concerns, without fear of retaliation, including opportunities for anonymous reporting.

In the event that a Supplier becomes aware of misconduct related to Quest Global business undertaken by any Quest Global employee, any of its employees, or any employees of its business partners, we expect Supplier to promptly notify us. Quest Global's Ethics & Compliance department may be contacted (anonymously, if preferred) by using our "Speak Up" tool (available at <http://speakup.quest-global.com/>)

Quest Global will never tolerate retaliation of any kind against anyone who reports a concern or participates in an investigation. Retaliation is itself a violation of this Code and will be treated as such.