



ANTI- CORRUPTION GUIDELINES

Questel

WHAT IS THE PURPOSE AND SCOPE OF THIS DOCUMENT?

These guidelines aim to assist staff understand and apply our anticorruption policy and integrity guidelines. They provide pragmatic information to help staff fulfill their duties and responsibilities.

HOW DO WE DEFINE CORRUPT AND FRAUDULENT PRACTICES?

Corrupt and fraudulent practices may be referred to as "integrity violations". Questel's office of anticorruption and integrity investigates all integrity violations. Integrity violations include :

- Corruption and fraud
- Coercive, obstructive or collusive practices
- Abuse, conflict of interest, or retaliation against whistleblowers
- Violations of our sanctions.

WHO IS RESPONSIBLE FOR IMPLEMENTING THE ANTICORRUPTION POLICY?

You are. Each staff member has an important role to play in our fight against corruption, and each has a personal obligation to ensure the integrity of our operations within their respective areas of responsibility.

TO WHOM DOES THE ANTICORRUPTION POLICY APPLY?

The anticorruption policy applies to all our staff and all entities associated with us and our activities. In other words, it applies to all Questel-related activities, and to staff, borrowers, beneficiaries, bidders, suppliers, consultants, and contractors.



WHAT OTHER DOCUMENTS ARE RELEVANT TO QUESTEL'S ANTICORRUPTION POLICY?

Staff should be familiar with the ethical marketing charter, the sustainable purchasing charter, and of course the CSR charter.

WHAT IS MISCONDUCT, AND HOW IS IT RELATED TO THE ANTICORRUPTION POLICY ?

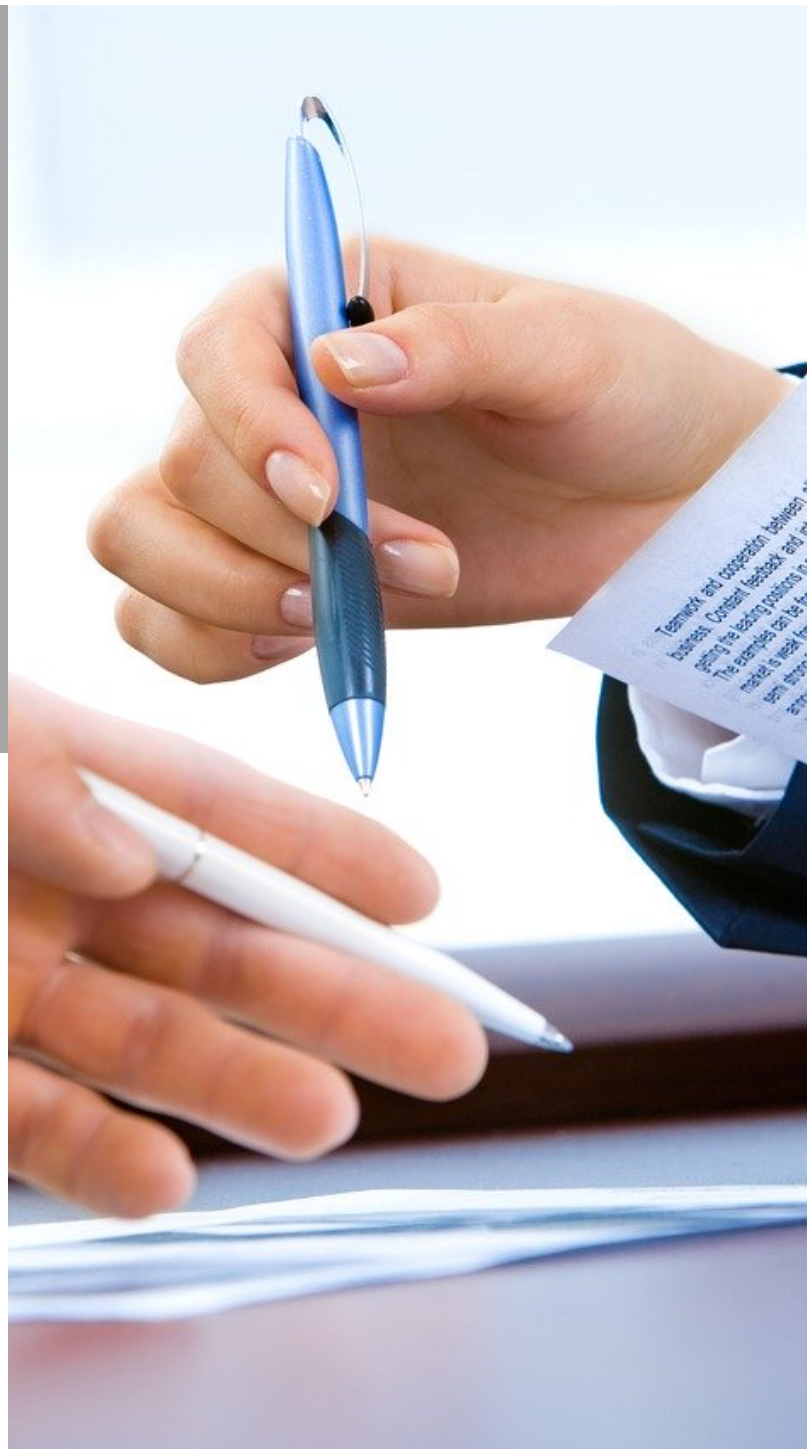
Misconduct includes the failure to observe all of the duties of employment. Examples of misconduct include, but are not limited to, fraud, abuse, harassment or alcohol and drug abuse.

WHAT IS A CONFLICT OF INTEREST ?

A conflict of interest is any situation in which a party has interests that could improperly influence that party's performance of official duties or responsibilities, contractual obligations or compliance. When a staff member's personal interest or relationship may be—or is—put before our best interests, that member is in a conflict of interest situation.

CAN I ACCEPT GIFTS?

For our staff, giving or accepting gifts is not allowed if the intention is to obtain a favor or influence other persons' performance of official duties. However, occasionally, and in accordance with tradition and culture, staff members may give gifts or contributions for an event of personal significance.



CAN I ACCEPT LUNCH INVITATIONS?

Reasonably hosted entertainment is acceptable. For instance, working lunches are okay, but a dinner at a five-star hotel with entertainment thrown in is acceptable only if this is a normal gesture of hospitality and you do not suspect a return favor is expected.

CAN I MAKE A DONATION, SPONSORSHIP FINANCIAL CONTRIBUTION?

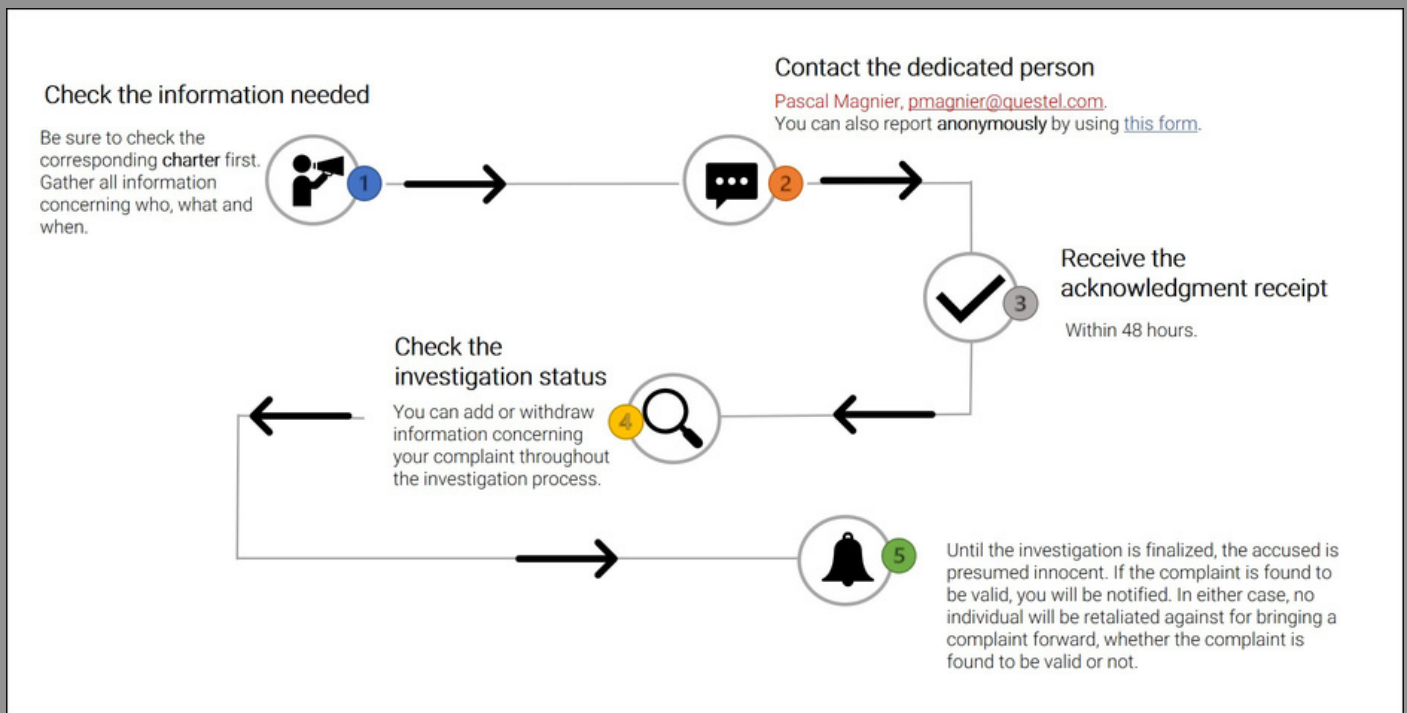
Questel does not make any direct or indirect contributions to political parties, politicians, lobby groups, advocacy groups, etc...

All donations and sponsorships must be processed and validated centrally at the group level, by the CSR department.

WHAT IS A WHISTLEBLOWER?

A person reporting allegations of fraud and corruption or misconduct is referred to as a whistleblower.

HOW TO REPORT SUSPECTED INTEGRITY VIOLATIONS?



DO I HAVE AN OBLIGATION TO REPORT INSTANCES OF INTEGRITY VIOLATIONS?

Yes, you do. Our staff have an obligation to ensure the integrity of our operations within their respective areas of responsibility and are specifically required to report allegations of integrity violations.



WHAT SHOULD I REPORT?

You should report any observed or suspected violation of this policy. This may involve our staff, contractors, consultants, and third parties, who may be individuals or entities (i.e., firms, joint ventures, or any other structure). To report allegations, please provide as much information and detail as possible. Ask yourself :

- Who do you think committed the corruption or fraud?
- Who else was implicated? Who else might have been involved?
- What happened? Describe the events fully and using as much relevant details as possible.
- When did it happen? Provide dates, time, and frequency.
- Where did it happen? Include not only the city and country but also, if possible, an actual address, the name of the building, the office number.

HOW CAN I REPORT?

You are not obligated to disclose your identity when reporting allegations of fraud or corruption. You can :

- contact the dedicated person : the CSR manager Pascal Magnier pmagnier@questel.com
- directly contact by using an anonymous e-mail adress.

Information concerning the identity of a complainant is strictly controlled within the compliance officers and will not be released to other Questel staff or to anyone outside Questel without the consent of the complainant.

WHAT WILL HAPPEN IF I FILE A REPORT THAT TURNS OUT NOT TO BE TRUE?

No one will be punished for reporting concerns in good faith in accordance with Questel's rules, even if the concerns reported cannot be supported by additional evidence, or are ultimately found to be incorrect. It is sufficient if the complainant believed the concerns to be accurate or suspicious enough to warrant reporting.



WHAT HAPPENS IF SOMEONE DELIBERATELY FILES A FALSE ALLEGATION?

We can impose disciplinary measures and/or sanctions on anyone who knowingly reports false, frivolous, or misleading information, as this constitutes misconduct. Our staff can benefit from Executive IP's e-learning courses to be fully trained and familiar with risk prevention, global compliance or business conduct. These enable our members to adhere to the highest ethical standards.

