

RESPONSIBLE PROGRESS TOWARD SUSTAINABILITY.

Well-controlled innovation contributes to improved living conditions and quality of life. Intellectual property plays a key role in ensuring that innovation is developed in a fair way, without counterfeiting and without abuse of a dominant position.

Questel works to reward the efforts of creators, innovators or researchers to be rewarded. We imagine and design tomorrow's software and services in a way to help them enforce their rights and value their intellectual assets. We make Intellectual Property technically and financially more accessible.

In support of this mission, Questel considers Corporate Social Responsibility (CSR) to be an important broad-based movement in business that encourages companies to take responsibility for the impact of their activities on customers, employees, communities and the environment.

« Our mission is to allow innovation to be developed in an efficient, secured and sustainable way. The efforts of innovators must be rewarded! »

Charles Besson, CEO

OUR GOALS

- Deliver products and services that meet the needs, values, and preferences of our customers
- 2. Accelerate the transition to a low-carbon economy
- Provide funding to critical social needs
- Improve the environmental impact of our operations
- 5. Strengthen the communities in which we operate

In order to meet the environmental, societal and ethical challenges that have become prevalent in our society, Questel is committed to applying a Social and Environmental Responsibility approach as a key to shared growth that is profitable for the company, its employees, partners and, more broadly, for civil society and the environment in which we operate.





SOCIAL DIMENSION

1. WE ATTACH GREAT IMPORTANCE TO SKILLS DEVELOPMENT

1. Internal resources

Questel provides its employees with a number of skill development pathways: Questel Academy, questel.com, Executive IP Training Library, and Questel CSR Library (all of which provides e-learning and training videos).

Educational content created by experts is distributed to employees, allowing for ongoing improvement through training.

2. Technical trainings / trades specific to our activity

Regular monitoring of the technical aptitude of our employees is essential. Employees represent a primary asset and competitive strength. To keep employees satisfied, best-in-industry training material is always readily available.

3. Conferences / fairs

In addition to providing internal training, Questel sponsors and encourages attendance at fairs and conferences on topics such as artificial intelligence, blockchain, and IP perspective & innovation.

2. WE ATTACH GREAT IMPORTANCE TO THE AUTONOMY OF PEOPLE

In fact, at Questel, management embraces collaborative leadership to support and facilitate employee initiative and autonomy. Thus, our company is based on these three main values:



Courtesy

As the 1st step toward respect

« Speak to everyone in the same way. And listen..."

Honesty

With coworkers,
partners and
customers of course,
but first with
ourselves

« Know Thyself"

Courage

To try, to fail, and to try again.

« The journey, rather than the success"

3. MULTICULTURAL DIMENSION

We thrive in a multicultural company environment. Indeed, the team consists of many different nationalities. For instance, more than 10 nationalities are working together in our French offices.

4. WE EMBRACE DIVERSITY AND FIGHT AGAINST DISCRIMINATION

We rely on the diversity of our workforce and talents. That distinctiveness is an asset to the group in terms of innovation, performance and competitiveness.

In this respect, we also refrain from all forms of discrimination for any reason and on any grounds whatsoever. Any conduct that violates the dignity of the individual is strictly forbidden.

The anti-discrimination policy is also characterised by the promotion of **gender parity.** In fact, we wish to attach particular importance to gender parity in society. This decision aims to promote **equal opportunities** for women in employment and pay, as well as to help all employees to reconcile work and family life (women-men equality plan).

5. WE PROMOTE THE INTEGRATION OF DISABLED PEOPLE

Questel is sensitive to the issue of disability. In fact, we try to make it easier for disabled people to access our premises. In addition, ergonomic furniture was made available to all employees. We also try to develop partnerships with companies that hire people with disabilities.

We also set up a week of awareness raising on disability conditions, with videos sent daily to employees, posters, with the aim of promoting the integration of these people within the company.





6. WE PROMOTE THE RECRUITMENT OF YOUNG ADULTS

Annually, Questel welcomes interns, as it seeks to support and integrate young people working upstream of the labour market. These internships are established to benefit both the company and the intern. The company gains an undeniable source of new talent who can then join us on a long-term basis through an open-ended contract. We generously welcome interns with a competitive salary and many fringe benefits such as luncheon vouchers, etc.

To facilitate these internship programs, the company works to develop partnerships with local universities.



Any Questel employee can propose a project that is dedicated to the benefit of children or to sustainable development of local communities. Our intention for the future, however, is to spread our donations evenly throughout the world.

Our goal is to invest in two new projects each year, while continuing to fund existing projects. We finance each project recurrently up to 5,000 euros annually. Our donations will be ongoing and sustainable in order to achieve an increasingly positive impact over the years. With this approach, we hope that over time our investments will make a significant difference.

Questel also encourages and supports other forms of charity, such as volunteering time and participating in local causes, providing equipment, etc.

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





8. WE GIVE PRIORITY TO THE WELL-BEING OF OUR EMPLOYEES

Questel is committed to contributing to the development of its employees. We have set up a range of benefits and services for them, contributing to their well-being.

- Promote and respect the protection of **international human rights** law within their sphere of influence within the company.
- Eliminating all forms of forced or compulsory labour.
- Acting against corruption in all its forms, including extortion and bribery.
- Organizing **team-building** activities to promote group cohesion.
- Encouraging responsible behaviour in offices to prevent harming colleagues; for example, we ask employees not to smoke within 8m of the office entrance
- Establishing a Social and Economic Committee which represents employees; the forum allows staff members to voice their concerns, comments and needs related to work life, outside the direct hierarchical lines.

In addition to these policies, Questel has implemented the following measures to help balance the work/life of employees:

- home office days (2 days per week),
- supporting breastfeeding mothers 12 month after birth: flexible hours with the agreement of the manger and 1 additional home office day per week
- · sport activities,
- days-off for the family or important family events,
- financial assistance for transports and meals.
- etc.

9. WE CONDEMN ALL FORMS OF CORRUPTION AND BRIBERY

At Questel, offering or accepting a bribe, in any form, to or from any person in either the public or private sectors, is prohibited. Reasonable hospitality and promotional or other business expenditures that seek to maintain cordial relations or present products or services, are recognized as a legitimate part of doing business. Anonymous reporting of perceived corruption, bribery or fraud is encouraged.



10. WE ARE LOYAL IN OUR PRATICES

We never offer any competition, monetary or otherwise, to obtain or retain a contract. None of our representatives or partners are authorized to make illegal payments on our behalf.

We also require total integrity from our employees in all aspects of business. Management expects all employees to comply with internal policies and government legislation.

We are committed to respecting the rights and expectations of individuals with regard to privacy and to protecting personal data against any unauthorized access, use, retention/storage and disclosure.

11. WE FIGHT AGAINST SEXUAL OR PERSONAL HARASSMENT

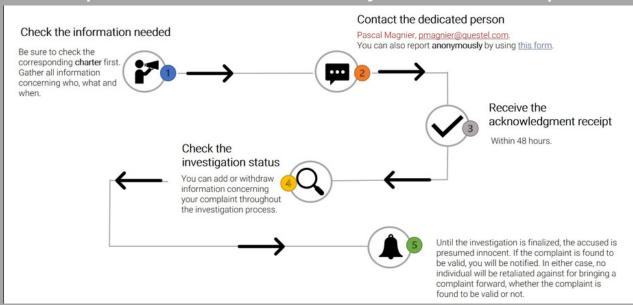
Sexual harassment is defined as any conduct, comment, gesture or contact of a sexual nature that is unwanted or unwelcome by any individual, or that might reasonably be perceived by that individual as placing a condition of a sexual nature on any business-related activity.

Personal harassment is defined as any conduct, verbal or physical, that is discriminatory in nature, based upon another person's race, color, ancestry, place of origin, political beliefs, religion, marital status, physical or mental disability, sex, age or sexual orientation. Personal harassment includes, but is not limited to, discriminatory or other behavior, directed at an individual, that is unwanted or unwelcome and causes substantial distress in that individual and serves no legitimate Questel-related purpose.

We do not tolerate sexual or personal harassment. Sexual or personal harassment in any form is strictly prohibited and may be grounds for suspension or termination as an officer, director or employee of Questel.

Questel's e-learning subsidiary has developed targeted videos and contents to train teams on these subjects.

How to report issues about ethics, diversity, harassment, corruption, etc.



THE ENVIRONMENT

WE ENCOURAGE SUSTAINABLE AND ECO-FRIENDLY BEHAVIORS

12. ENVIRONMENT AND 13. WE ARE PEOPLE'S HEALTH ARE A PRIORITY

We attach particular importance to respect for the environment. In addition to reducing the direct impact of our activity on the environment, our long-term activity should also help our clients to meet their own environmental objectives.

This is why environmental protection is integrated into all aspects of our business.

The main existing environmental and pollution are related risks management of waste electrical electronic equipment (WEEE).

We ensure that our equipment has a longer lifecycle and promote the circular economy for our equipement (reuse, recycle, donate).

IMPLEMENTING A RECYCLING POLICY

Employees have been notified about the collection boxes that been set up for sorting and recycling waste. Today, waste collection and recovery systems are in place for paper, plastic cups and bottles, and ink cartridges.

We also set up new and ecoresponsible equipment encouraging the various offices to equip themselves with bean coffee machines (without capsules to reduce waste), and for people to use mugs for their coffee in order to avoid the use of disposable plastic cups.



14. WE ARE DEVELOPING A GREEN IT POLICY

QUESTEL IS FOCUSING ON TWO MAIN LINES FOR OUR GREEN IT POLICY: REDUCING THE ENVIRONMENTAL IMPACT OF OUR INFORMATION SYSTEMS (IS) AND USING THEM TO SUPPORT SUSTAINABLE DEVELOPMENT.

14.1. REDUCE THE IMPACT OF OUR IS ON THE ENVIRONMENT

Because they are energy-intensive, our information systems and their use must be streamlined and improved to reduce our carbon footprint. Questel carries out various actions to this end:

Rationalization of printing: reduction of printing volume (black and white, double-sided, systemization of the print preview), collection and recycling of consumables (paper, toners, cartridges), reuse of unused printed paper as drafts or notepads, text at the bottom of each email inviting recipients not to print.

Data storage at datacenters in France: reduction of energy consumption, green powered servicers, server virtualization and optimization of air conditioning equipment.

14.2. USE OF OUR INFORMATION SYSTEMS TO SUPPORT SUSTAINABLE DEVELOPMENT

Also known as "IT for Green," the second axis of our Green IT policy is to make new technologies a lever for improving environmental performance. In particular, we are committed to the implementation and evolution of the videoconferencing and web conferencing infrastructure in order to reduce travel during inter-agency meetings, steering committees, etc.

WE TRY TO IMPROVE
OURSELVES TO HELP THE
PLANET THROUGH SMALL
ACTIONS FROM EVERYDAY
LIFE TO THE OFFICE





14.3. CIRCULAR ECONOMY POLICY FOR HAZARDOUS WASTE

- 1. Purchase of **reconditioned** equipment (electronic equipment such as computers, laptops, cellphones, etc.), as opposed to new, as often as possible
- Refurbishment / repair of computer and electronic equipment.
- 3. **Donation** of non-performing equipment to associations or employees.
- 4. Safe & responsible disposal of hazardous waste, following these steps:
 - separate and store hazardous waste safely
 - use an authorised waste carrier to collect, recycle or dispose of hazardous waste
 - If possible, keep a record of waste donated, recycled, or stored for reporting purposes

<u>Examples of hazardous business waste</u>: batteries, electronic equipment (computers, laptops, cellphones, etc.), printer cartridges, unused and surplus cleaners, empty aerosol cans, fluorescent light bulbs, etc.

15. WE ARE COMMITTED TO REDUCING OUR ENERGY AND TECHNOLOGY FOOTPRINT

This requires encouraging all employees to reduce their consumption of air conditioning and heating equipment and to turn off their computers every evening, leaving no appliances on standby.

In addition, employees are encouraged to delete unnecessary emails and empty the recycle bin of their energy-intensive email storage.

Actions are also being implemented to optimize energy management, such as the use of video and other media for professional or social communications.

16. WE ARE COMMITTED TO REDUCING OUR CO2 EMISSIONS REGARDING TRANSPORT & TRAVEL

- 1. We are committed to an approach that minimizes travel and favours trains instead of planes for less than 4 hours journey or virtual meetings.
- 2. Alternatives to the systematic transport of equipment are being implemented at numerous tradeshows across Europe (rental, local production, etc).
- 3. We strongly encourage our employees to use alternative and collaborative transportation. The offices are generally located near public transportation systems.

17. GREEN PURCHASING POLICY

Our CSR approach is also affirmed through our daily purchases of materials, consumables and products. We encourage all entities to make eco-responsible purchases whenever possible in order to have the least negative impact on our planet.

Office supplies:

- Recycled or biodegradable paper, notebooks, pens, business cards...
- Green goodies for clients or trade shows
- Mugs instead of plastic cups
- -etc.

Cleaning:

- Natural and non-toxic cleaning products (preference for, eco-labels)

Electronics equipements:

- Purchase as often as possible of reconditioned equipment rather than new ones
- Refurbishment / repair of computer and electronic equipment
- Donation to associations or to employees of non-performing equipment

Meetings & conferences

- Promote e-meeting and videoconference to avoid the smog and greenhouse gas emissions associated with air and ground travel to the paper, plastic, and food waste associated with feeding attendees.



ETHICS

AND SUPPLIERS

AN IMPORTANT DIMENSION IN OUR EYES IS RESPECT FOR ETHICS, WHETHER IT IS SOCIAL TOWARDS OUR EMPLOYEES OR TOWARDS THE THOUGHTFUL CHOICE OF OUR SUPPLIERS.

18. OUR ETHICAL GUIDELINES

The Company's management is responsible for ensuring its organisation operates and behaves to secure compliance within the areas of human rights, labour rights, environment and corruption.

The Company aspires to conduct its business in accordance with the following UN Global Compact principles:

- Support the rights of all individuals independent of gender, race and religion
- Uphold the freedom of association and the right to bargain collectively
- Provide working conditions that surpass basic health and safety standards
- Operate good governance practices, in particular in relation to bribery and corruption and conflict of interests
- Support a precautionary approach to environmental challenges, and undertake initiatives to promote greater environmental responsibility

WE ENSURE THAT WE ARE IN COMPLIANCE WITH OUR SOCIAL AND TAX COMMITMENTS IN THE COUNTRIES IN WHICH WE OPERATE.

Based on the principles, the Company's management and board are responsible for ensuring the following commitments are met:

- Integrate the above principles into its decision-making process by carefully considering ESG issues
- Implement governance structures that provide appropriate levels of oversight and seek the disclosure on ESG issues
- Seek to be transparent in its efforts to integrate ESG and its progress towards implementing the above principles
- Continuously strive to improve ESG performance
- Aspire to conduct its business in full compliance with national and other applicable laws

19. WE CHOOSE OUR SUPPLIERS CAREFULLY

Sharing same values & principles:

We surround ourselves with suppliers who share the same environmental and social values and principles as Questel (respect for Human Rights and labor laws, diversity, ethics, transparency, respect, etc.)

Reducing the environmental impact:

We pool our orders in order to limit the number of deliveries and therefore the number of trips.

Choosing local suppliers:

We encourage each subsidiary to draw up a list of local suppliers and to give them priority for all day-to-day purchases, as the carbon impact will be lower than an international purchase and we are thus strengthening a virtuous economic ecosystem.

We want that 25% of our purchases to come from local suppliers.



20. BREACHES OF THE CODE OF ETHICS

Non-compliance with the principles outlined in this charter is subject to disciplinary sanctions which will be reported to the Top management and the Board. Some of these sanctions may be set out in the internal regulations of the Group's various subsidiaries, and may include termination of the employment contract or supplier contract, in accordance with local legislation and applicable collective agreements.

Sanctions will be defined on a case-by-case basis depending on the severity of the infraction and guidelines with detailed instructions can be developed as needed.

