



Code of Conduct:
Integrity at Our Core





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A Message from Our CEO



Dear Quest Global team,

As innovators solving the hardest problems, we know that the way we do business is just as important as the results we achieve. We also know that in order to be our customers' most trusted partner, we must deliver on our commitments, none of which is more consequential than ethical behavior. Our core values of Integrity, Customer Focus, and Collaboration are the cornerstone of who we are, what we stand for, and what we do. Each of us is accountable for our own ethical behavior. To help you understand our core values and your personal accountability to meet the highest ethical standards, we have our Code, a dynamic document that we update regularly.

Our Code of Conduct lays out the path to ethical behavior. It is a blueprint of our core values. It guides us toward responsible and exemplary conduct, no matter our role or location. It provides the resources and information we need to operate our business with unfailing responsibility and integrity. By following not only the letter but also the spirit of our Code, we build trust with our customers, strengthen our reputation, and ensure our legacy.

I encourage everyone to join me in reading our Code, adhering to its principles, and consulting it often. It is the most dependable way to ensure that at Quest Global, we do what we say we will do, always delivering on our promises with ethics and compliance at our core. Refer to it often so it becomes your guide on how to conduct business on behalf of Quest Global.

Thank you,

Ajit Prabhu

Chairman and Chief Executive Officer

EXECUTIVE LEADERSHIP

Lindsey Gauthier, General Counsel and Chief Ethics and Compliance Officer

Yumiko Clevenger-Lee, Chief Marketing Officer

Colleen Doherty, Chief People Officer

Lux Ramalingam, Chief Operating Officer

Dushy Reddy, Chief Business Officer

Rajendra Shreemal, Chief Financial Officer

BOARD OF DIRECTORS

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Michael Propen

Shweta Jalan

Thomas Brown

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Gregory Smith

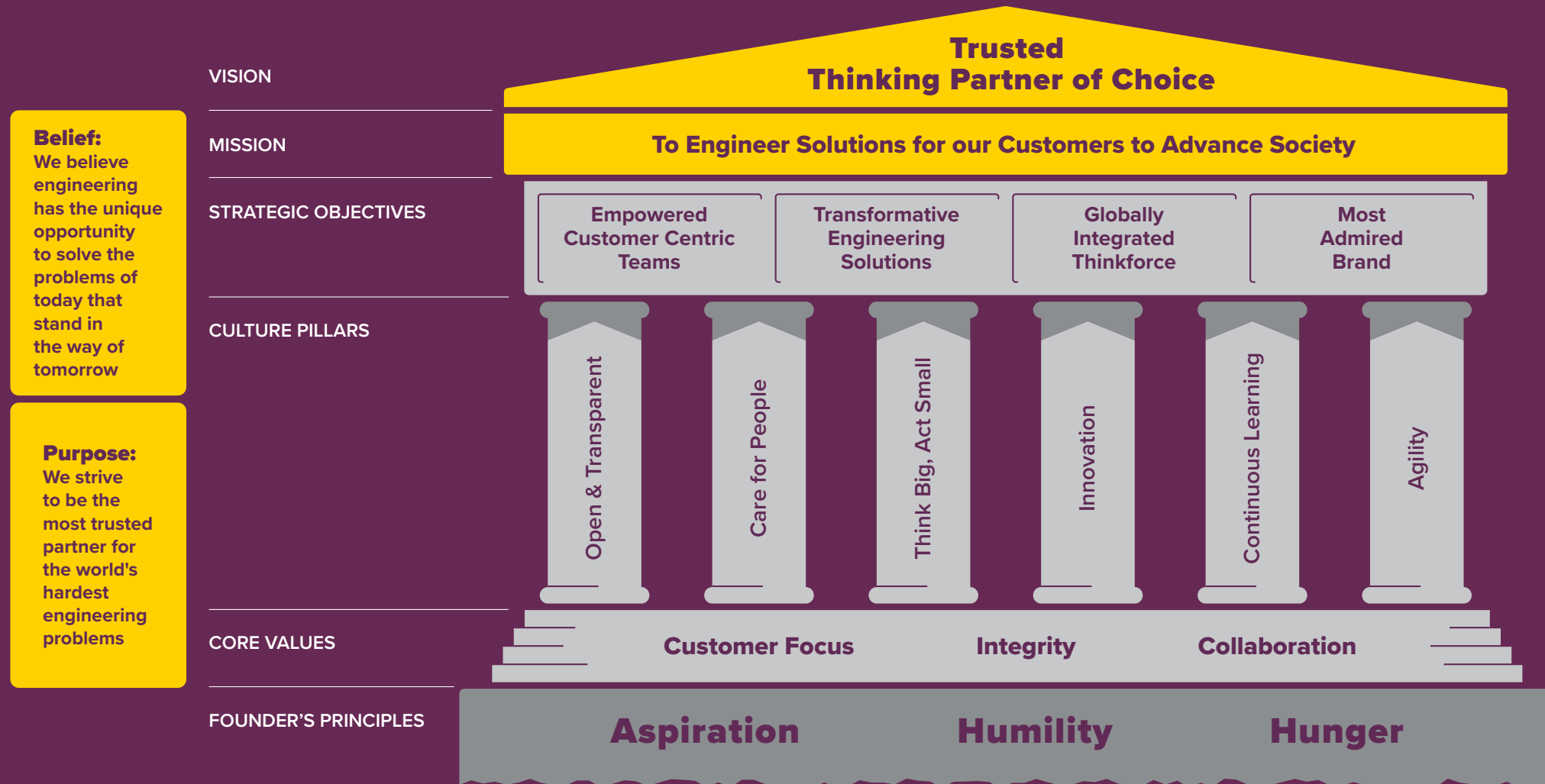
Ajay Prabhu

Claudia Ricarda Rita

Suesmuth Dyckerhoff



Our Belief, Purpose, and House of Quest Global





Living Our Code

| Our Code of Conduct

At Quest Global, we believe in doing the right thing. The Quest Global Code of Conduct (our “Code”) is our guide to meet the highest standard for ethical behavior. It gives us the tools and resources we need to act with integrity by making good business decisions, learning about our responsibilities, and Speaking Up about ethical concerns.

PURPOSE

Our Code is not a list of rules—it provides practical resources that help us bring integrity to all our day-to-day actions. It helps us protect our business and sustain our ethical culture. By following our Code, we contribute to the continued success of Quest Global.

HOW TO USE THE CODE

Our Code is divided into sections that address how we bring integrity to all areas of our business. These are:

- Our people
- Our marketplace
- Our company
- Our communities

Each section covers topics related to these business areas and provides specific advice for ethical behavior and resources for further guidance.

We are all expected to read our Code thoroughly, understand how it applies to our work, and refer to it as questions arise.



Our Responsibilities

We are all responsible for understanding and following our Code. Our Code applies to everyone at Quest Global, including:

- Employees
- Managers
- Directors
- Contractors, consultants, and advisors
- Agents
- Representatives
- Anyone else working on behalf of Quest Global or its subsidiaries

EVERYONE'S RESPONSIBILITIES

We are all responsible for understanding and complying with our Code. Together, we keep integrity at our core. This means we do what is right:

- Commit to act with integrity and the highest ethical standards in our work.
- Know and follow the laws and policies that apply to our roles.
- Read and refer to our Code often.
- Complete all required trainings on time.
- Seek guidance if we are unsure about any decision or situation.
- Speak Up and report concerns if something doesn't seem right.
- Never tolerate retaliation for Speaking Up.
- Cooperate with all investigations.

SPECIAL RESPONSIBILITIES OF MANAGERS

Managers and leaders at all levels have additional responsibilities to uphold our Code. Employees often look to leadership for guidance and examples of ethical behavior. Managers must do what is right:

- Act as role models for integrity and demonstrate that ethical behavior takes priority over business results.
- Treat all employees fairly and respectfully.
- Prevent, detect, and facilitate investigations of unethical situations.
- Encourage employees to raise questions and concerns without fear of retaliation.
- Listen and respond appropriately to employee concerns.

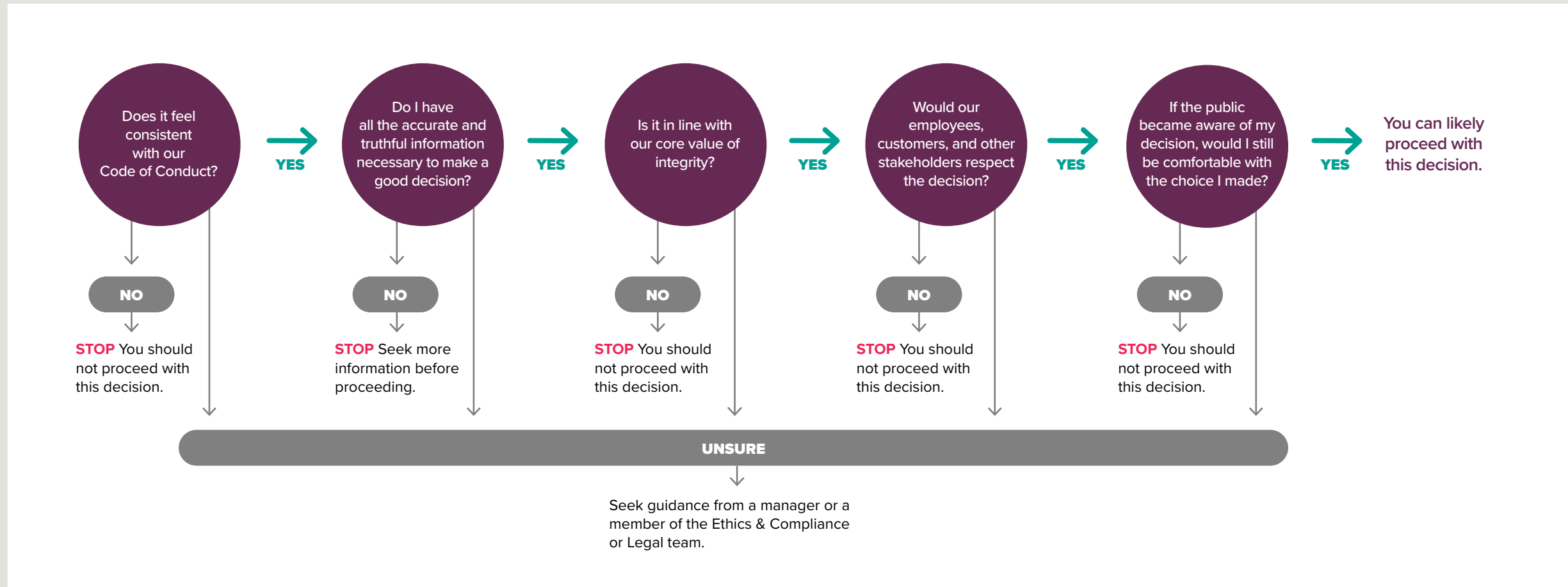
CONSEQUENCES OF MISCONDUCT

Any reported violation of our Code will be fully investigated. Proven violations will result in disciplinary action, up to and including dismissal. Disciplinary action will be uniformly applied to anyone who violates the Code regardless of their status or tenure. In certain cases, violations could result in legal consequences for the company and/or the individuals involved.



How We Make Decisions

Our Code and policies provide guidance for many business decisions, but they can't address every situation. Use the following questions as a guide when trying to make a difficult decision about business conduct:





Speaking Up, Seeking Help

| Speaking Up

We always Speak Up when we see something that isn't right. It is our shared responsibility to ask questions and raise concerns about actions that don't follow our Code or policies. Speaking Up provides the foundation of an ethical culture. By Speaking Up, we keep integrity at our core.

If you have a question or concern, you can raise it by:

- Using the Speak Up Tool.
- Talking to your manager.
- Contacting a member of the Quest Global Human Resources, Legal, or Ethics & Compliance team.

SPEAK UP TOOL



The Speak Up Tool is a secure space for us to report behavior inconsistent with our Code of Conduct.

The Speak Up Tool is:

- Easy to use and has an option for anonymity.
- Accessible from anywhere, online or by phone.
- Available 24/7 from inside or outside Quest Global.
- Open to reports from employees as well as customers and contractors.

| Anonymity

The Speak Up Tool provides an option for you to identify yourself or remain anonymous. If you choose to remain anonymous, the Speak Up Tool still allows for communication between Quest Global and you.



EXAMPLES OF RETALIATION INCLUDE:

- Termination, reduced work hours, or work schedule changes
- Punitive work assignments
- Negative impact on compensation, promotions, or performance evaluations
- Hostile work environment

INTEGRITY IN ACTION: SPEAKING UP

SCENARIO: You suspect that your manager may be engaging in misconduct. Your manager is the person to whom you would normally go with such a concern. What would YOU do?

TAKEAWAYS: You have several options for reporting this incident other than going to your manager directly. You can report the incident securely and anonymously through the Speak Up Tool, or you can contact a member of Quest Global's Human Resources, Legal, or Ethics & Compliance team.

What Happens When I Speak Up About Misconduct?

1. Quest Global evaluates the report and assigns an investigator.
2. The investigator may contact you during the investigation, either directly or (if you have chosen to remain anonymous) using the Speak Up Tool.
3. The results of the investigation will be documented and will be used to determine appropriate actions, which may include:
 - Corrective actions
 - Improvement actions
 - Disciplinary actions

Zero Tolerance for Retaliation

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 our Code and will be treated as such.

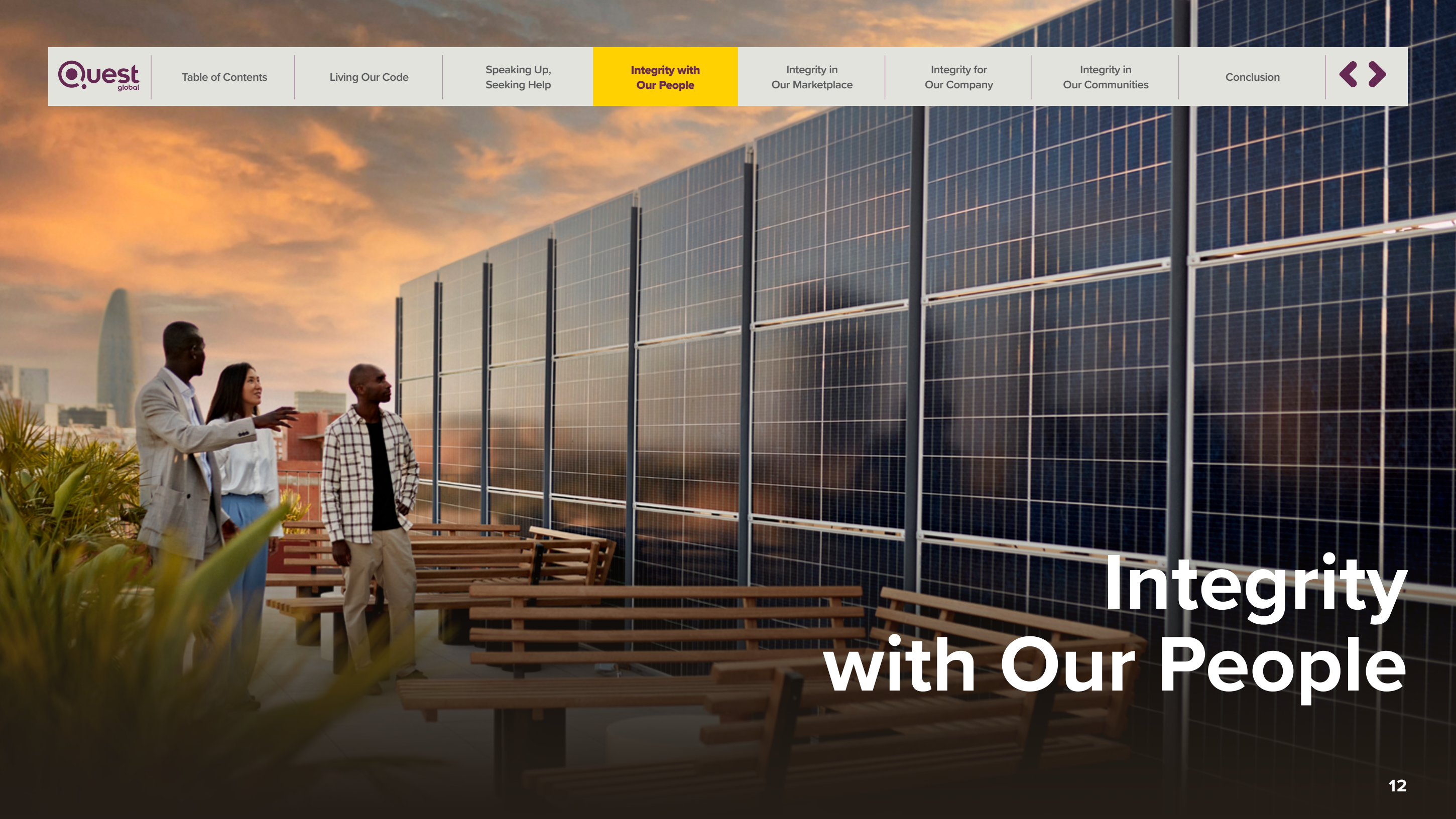


RESOURCES

[Speak Up Tool](#)

[HUM-POL-214 Global Speak Up Policy](#)





Integrity with Our People

We Embrace Diversity, Equity, and Inclusion

WHY IT MATTERS

We do our best work when our teams benefit from diverse talents and our people feel included. Providing fair treatment and equal employment opportunities to everyone helps create our culture of integrity.

OUR COMMITMENT

At Quest Global, we support diversity and equal opportunity in all our hiring and human resource management practices. We follow all laws that apply to nondiscrimination in employment wherever we do business.

PROTECTED CHARACTERISTICS

We never discriminate based on “protected characteristics.” These can include:

- Race, color, ethnicity, or national origin
- Gender or gender identity
- Pregnancy status
- Medical condition
- Religion
- Sexual orientation
- Age
- Disability
- Marital status
- Veteran status
- Any other characteristic covered by federal, state, and local laws



HOW WE KEEP INTEGRITY AT OUR CORE

To embrace diversity, equity, and inclusion, we:

- Never tolerate discrimination or harassment of any kind.
- Provide equal opportunities to everyone, regardless of a person's protected characteristics.
- Make all employment decisions—including hiring, placement, promotion, compensation, and training—based only on merit.
- Seek input from all team members and listen to different points of view.
- Provide reasonable accommodations to any qualified individual with a disability.



RESOURCES

[QMS – People Function Page](#)

THE IMPORTANCE OF DIVERSITY, EQUITY, AND INCLUSION

When every employee feels safe and encouraged to share ideas across a diversity of backgrounds, our workplace thrives and our customers win. Our inclusive culture embraces all people, bound by a collective and greater good that connects us. We demonstrate our culture pillar of Care for People by being empathetic and showing respect for everyone based on who they are and what they do. Promoting a deep sense of belonging that allows every employee to feel included is synonymous with our culture.



We Prevent Harassment and Discrimination

WHY IT MATTERS

Our commitment to integrity means showing respect for each other in all our actions. Everyone is entitled to work in an environment free from discrimination or harassment. Our business thrives when we uphold the dignity of all our people.

DEFINING HARASSMENT

Remember that harassment can include:

- What we say or write (in person or on social media), including racial, ethnic, or gender-based slurs, jokes, or stereotypes, or using threatening, loud, or abusive language.
- What we do, such as unwelcome touching, making sexual advances, or blocking someone's path.
- What we display, such as placing what others may consider sexually suggestive materials or potentially offensive slogans, posters, or bumper stickers in or on Quest Global property.

When it comes to harassment, the question isn't what we mean or intend by our words or actions, but how others might perceive or react to them.





OUR COMMITMENT

We do not accept any form of harassment at Quest Global. We never tolerate discrimination based on any protected characteristics. Our policies related to discrimination and harassment provide more information.

HOW WE KEEP INTEGRITY AT OUR CORE

To prevent harassment and discrimination, we:

- Treat each other with courtesy and respect.
- Avoid saying or doing anything that others may find offensive.
- Speak Up if we experience or witness any harassing conduct.
- Provide harassment training.

INTEGRITY IN ACTION: ADDRESSING HARASSMENT

Managers must take all reports of misconduct very seriously, even in the event the accusation is against an influential customer or senior leader. Any report of alleged misconduct must be properly reported, documented, and investigated.



RESOURCES

[HUM-POL-487 - North America Employee Handbook](#)

[HUM-POL-215 Regional Anti Sexual Harassment India Policy](#)

[HUM-POL-252 Regional Standards of Conduct and Interpersonal Communication Policy Spain](#)

We Prevent Workplace Violence

WHY IT MATTERS

The safety of our people is our highest priority. Keeping violent conduct out of our workplaces protects our employees, visitors, and communities from harm.

OUR COMMITMENT

Quest Global does not tolerate violence or threats in the workplace.

HOW WE KEEP INTEGRITY AT OUR CORE

To help prevent workplace violence, we:

- Never report to work or conduct Quest Global business while in possession of a firearm or weapon.
- Never engage in threatening behavior while at work or representing Quest Global, including during business travel.
- Contact proper authorities in the case of immediate danger.

INTEGRITY IN ACTION: PREVENTING VIOLENCE

SCENARIO: You notice two colleagues having a disagreement. Before long, the disagreement escalates into a shouting match. What would YOU do?

TAKEAWAYS: You have witnessed behavior that violates our Code and may represent a threat. You have a responsibility to immediately report the situation to a manager or a member of the Human Resources team. Your safety and the safety of your coworkers depend on it.



We Avoid Drugs and Alcohol in the Workplace

WHY IT MATTERS

Keeping our workplace safe and secure is a shared responsibility. Alcohol and drug abuse threatens the health and safety of Quest Global employees, customers, and other shareholders. It also risks the security of our equipment and facilities.

OUR COMMITMENT

We protect the safety and well-being of all our employees. We expect employees to work free from the effects of any illegal substances.

HOW WE KEEP INTEGRITY AT OUR CORE

To avoid drug and alcohol use in the workplace, we:

- Never conduct any Quest Global business, including working or driving, while under the influence of illegal drugs, recreational drugs, or alcohol.
- Never bring illegal drugs, recreational drugs, or alcohol into a Quest Global workplace.
- Speak Up if we see anyone who may be under the influence while at work.



INTEGRITY IN ACTION: AVOIDING DRUGS AND ALCOHOL

SCENARIO: Throughout the workday, you notice that a coworker is behaving strangely. They slur their words, have trouble walking, and seem upset for no reason. Later, you smell alcohol on their breath. What would YOU do?

TAKEAWAYS: You have reason to suspect that your coworker may be under the influence of alcohol at work. You have an obligation to report this by talking to your manager, Human Resources, or the Ethics & Compliance team, or by using the Speak Up Tool.

We Practice Honesty in Communication

WHY IT MATTERS

When we communicate truthfully about Quest Global, we build trust in the marketplace. Giving clear and accurate information about our services, solutions, and capabilities strengthens our business relationships and our reputation.

Remember that anything written or said about our company directly impacts our reputation. We must take care to communicate about Quest Global consistently and accurately.

OUR COMMITMENT

We represent Quest Global with pride, transparency, and truthfulness throughout our communications. Even if our role is not related to sales or marketing, we remain aware that every interaction is a chance to make a positive impression of the Quest Global brand.

HOW WE KEEP INTEGRITY AT OUR CORE

To practice honesty in communication, we:

- Always communicate accurately and truthfully to customers, employees, and all stakeholders.
- Never misrepresent our services or capabilities.
- Never speak to the media or investors about Quest Global unless we are specifically authorized to do so.

HONEST COMMUNICATION IS ESSENTIAL

The following are examples of situations in which honest communication is essential:

- Timesheets
- Communication with customers
- Communication with external stakeholders such as governments, auditors, and investors
- Communication with employees

INTEGRITY IN ACTION: HONEST COMMUNICATION

SCENARIO: A friend and former employee approaches you and asks how things are going at Quest Global. What would YOU do?

TAKEAWAYS: This is a common situation, but one that must be handled thoughtfully. You can speak in generalities about the company and the business, but you must be careful to not reveal specific sensitive information about Quest Global, personal information about any employee or former employee, or any confidential customer information.



RESOURCES

[MKT-POL-063 Global Press and Media Policy](#)

We Safeguard the Health, Safety, and Human Rights of Our People

WHY IT MATTERS

As a global company, Quest Global affirms the dignity and equality of people all over the world. Keeping integrity at our core begins with keeping our people safe and healthy at work. That commitment extends to safeguarding global human rights throughout our supply chain.

OUR COMMITMENT

Quest Global manages the recruitment and employment of our people with the highest ethical standards. We follow all employment-based immigration and labor laws and have policies and practices in place to prevent human trafficking, child labor, and other unsafe or unfair work practices in our global communities.

HOW WE KEEP INTEGRITY AT OUR CORE

To safeguard health, safety, and human rights, we:

- Provide proper working hours and conditions to all Quest Global employees.
- Report any workplace hazards or unsafe behaviors.
- Follow the immigration laws and policies of the countries where we operate.
- Take a zero-tolerance approach to child labor and modern slavery anywhere in our organization or supply chains.
- Make sure our suppliers and business stakeholders are committed to fair labor and human rights.

INTEGRITY IN ACTION: HUMAN RIGHTS

If we become aware that one of our suppliers is exploiting child labor, we must immediately cut ties with the supplier and report it. Quest Global has zero tolerance for child labor and modern slavery.



RESOURCES

[LEG-POL-066 Global Anti-Slavery and Human Trafficking Policy](#)



We Use Social Media Responsibly

WHY IT MATTERS

While social media provides opportunities to build our business and engage with employees, customers, and stakeholders, its use has the potential to impact Quest Global's reputation and expose the company to business or legal risk. We are all representatives of Quest Global, and the actions we take at work or when representing Quest Global on social media can leave a long-lasting impact. Information shared online has the potential to be misunderstood, distorted, or otherwise used to negatively impact the company.

OUR COMMITMENT

Before posting or sharing on social media, we consider the risks and benefits of doing so. Remember that we are all personally responsible for what we post online. If we post on social media about Quest Global, we must separate our individual opinions from the opinions of Quest Global.



WHAT IS SOCIAL MEDIA?

Social media includes all means of posting information or content of any kind on the Internet. This could include your own or someone else's blog, online journal, personal website, social networking website, or chat room.

HOW WE KEEP INTEGRITY AT OUR CORE

When posting content referencing Quest Global, you should:

- Identify yourself as a Quest Global employee.
- Identify opinions as your own; never represent yourself as a spokesperson for Quest Global.
- Make sure any information you share is honest and accurate.
- Conduct yourself with respect, and never engage in harassment or bullying.
- Do not participate in any form of online hate speech and report such abuse to the appropriate social media platform.
- Protect private and confidential information.
- Refrain from sharing any customer names apart from the ones mentioned on the Quest Global website.
- Refrain from posting negative comments about Quest Global's competitors or customers.
- Be conscious when mixing your business and personal lives.
- Get help when you are not sure if a post is appropriate. You can seek guidance from the "[How We Make Decisions](#)" guide in the Code, the marketing team, or the social media policy before posting.

WHAT IS ONLINE HATE SPEECH?

Online hate speech is defined as behavior or content that promotes violence against, vilifies, or dehumanizes groups or individuals based on protected characteristics.



INTEGRITY IN ACTION: SOCIAL MEDIA

If you become aware of an employee or former employee harassing or threatening Quest Global associates on social media, you should report it to your manager, Human Resources, or the Ethics & Compliance team.



RESOURCES

[MKT-POL-068 Global Social Media Policy](#)

 A background image showing three business women in an office setting, smiling and engaged in conversation. The woman in the center is wearing a dark blue pinstriped blazer over a light blue shirt. The woman on the left has curly hair and is wearing a white shirt. The woman on the right is partially visible and out of focus.

Integrity in Our Marketplace

We Prevent Bribery and Corruption

WHY IT MATTERS

To protect Quest Global's culture of integrity, we must work together to prevent any form of corruption, which includes bribery. Bribery is offering, giving, or receiving anything of value in order to improperly influence a business decision. Bribery is illegal and can harm our industry and our reputation. Even the appearance of corruption can have serious outcomes for our company and for the individuals involved.

OUR COMMITMENT

We win business based on our integrity and the strength of our services. We never give or receive bribes or any other improper payments. All bribes are prohibited, regardless of whether the bribe is permitted by local custom or is very small in monetary value.

As a global company, we follow the anti-corruption laws of the countries where we conduct business. These include the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and the Prevention of Corruption Act in India.



HOW WE KEEP INTEGRITY AT OUR CORE

To help prevent bribery and corruption, we:

- Never give or receive bribes or facilitation payments.
- Follow our Code and policies when we exchange gifts or hospitality with current or potential business stakeholders.
- Only work with partners who share our values.
- Take care when interacting with government officials. Stricter laws often apply to these interactions.
- Never allow a third party to make improper payments on our behalf.
- Keep accurate and complete records of all financial transactions.
- Report any suspected bribes or facilitation payments in the Speak Up Tool or to a member of the Ethics & Compliance or Legal team.
- Never offer, give, or receive anything of value in order to influence business decisions.



RESOURCES

[LEG-POL-064 Global Anti-Bribery & Anti-Corruption Policy](#)

ANYTHING OF VALUE

“Anything of Value” to the recipient can be considered a bribe.

This could include:

- Cash or cash equivalents
- Excessive business promotional activities
- Covering or reimbursing an individual’s expenses
- Charitable or political contributions
- Investment opportunities
- Shares, securities, loans, or contractual rights
- Promise of future employment
- Payments disguised as legitimate agreements
- Gifts and entertainment (see [“We Give and Receive Gifts Responsibly”](#))

INTEGRITY IN ACTION: PREVENTING BRIBERY

SCENARIO: You hear that a government official is demanding an unofficial facilitation payment to approve a construction project for a new Quest Global facility and that your manager is considering authorizing the payment so the project can continue. What would YOU do?

TAKEAWAYS: You have an obligation to report this through appropriate channels such as the Speak Up Tool or to the Quest Global Legal team. Facilitation payments violate Quest Global’s Anti-Bribery Policy.



We Comply with Export Control and Sanctions Laws

WHY IT MATTERS

At Quest Global, we provide services to customers all over the world and transfer technology across international borders. **It is critical that our business and employees follow all the laws and regulations that govern international transfers of technology and goods.** Non-compliance with export control laws can result in criminal and civil penalties, fines, business disruptions, and reputational damage.

OUR COMMITMENT

Quest Global fully complies with all export control requirements in the regions where we operate. We maintain a set of policies, documents, tools, and trainings related to export control.

HOW WE KEEP INTEGRITY AT OUR CORE

To comply with export control and sanctions laws, we:

- Take individual responsibility to be aware of export control requirements, including staying current with training requirements.
- Are aware that help is available through the Export Compliance Officer (ECO) program.
- Hold each business unit and individual accountable to do the right thing or seek guidance when faced with any export control issues.
- Thoroughly review, in advance, all technology transfers and international travel for export control considerations.
- Review all new business opportunities for export control considerations.



RESOURCES
[LEG-POL-069 - Global Export Control Policy](#)



We Compete Honestly and Fairly

WHY IT MATTERS

At Quest Global, we believe in the importance of a free and fair marketplace. We welcome strong competition, which encourages us to work hard and innovate for our customers. Violations of competition laws can result in significant fines and even prison sentences. To protect our reputation and our business, we follow these laws carefully.

OUR COMMITMENT

We compete vigorously and ethically for business—never through inappropriate conduct in the marketplace. Quest Global complies with all antitrust, monopoly, competition, and cartel laws everywhere we do business. We also take care to always gather competitive information honestly. Quest Global’s Anti-trust and Competition Policy gives detailed information to help us compete fairly.



HOW WE KEEP INTEGRITY AT OUR CORE

To compete honestly and fairly, we:

- Know or seek to understand the antitrust rules that apply to our work.
- Recognize when to seek guidance when faced with a competition issue.
- Make sure to conduct any meetings with competitors carefully after obtaining guidance from the Quest Global Legal team. Only meet if there is a legitimate business purpose and a pre-approved agenda.
- Never discuss prices, ongoing bids, terms and conditions of sales, market shares, costs, or profit margins with our competitors.
- Never make agreements with competitors to fix prices, fix wages, rig bids, or allocate clients or markets.
- Never use illegal or improper means to gain competitive information.
- Never make false claims about our competitors.
- Ask questions or report concerns related to competition as soon as possible to our Legal team or through the Speak Up Tool.

INTEGRITY IN ACTION: COMPETITION

SCENARIO: You are working on the customer's computer network and you come across a file that has pricing information from one of our competitors. Can you use this information to prepare a bid to win business currently held by the competitor?

TAKEAWAYS: No. This information is likely confidential. Using the information would not be ethical and would conflict with our Code. It may also conflict with antitrust laws. In addition, the situation should be reported to the Legal team or through the Speak Up Tool so that the customer can ensure access is restricted.



We Conduct Government Business Legally and Ethically

WHY IT MATTERS

Special responsibilities apply to our work with government partners and our customers who produce work for governments. Doing business in this sector is very different from doing business in the commercial marketplace. To maintain these partnerships, we embrace these responsibilities.

OUR COMMITMENT

We are transparent in our dealings with government agencies and officials. As a global company, we respect the integrity of governments and their representatives everywhere we do business. We follow all government procurement laws and regulations without political affiliation.

WHAT IS GOVERNMENT BUSINESS?

Employees may not be aware that their activities are subject to the government contracting policy, because in most instances Quest Global's immediate customer is not a government. However, many of our customers are prime contractors for government work, so government contracting requirements still apply to Quest Global.



HOW WE KEEP INTEGRITY AT OUR CORE

To conduct government business legally and ethically, we:

- Carefully review all government contracts to identify necessary compliance measures.
- Provide training or guidance to Quest Global employees on any government authority or representative contract requirements when appropriate.
- Keep accurate and complete records of all financial transactions related to government contracts.
- Ensure that any information or reports we provide to government are accurate, complete, and truthful.
- Protect the confidentiality of information related to our government contracts and relationships.
- Never use Quest Global funds or assets for political contributions.
- Never offer or give anything of value to a government official to influence a business decision.

INTEGRITY IN ACTION: DEALING WITH GOVERNMENTS

SCENARIO: There is a political candidate that you are passionate about. Is it okay for you to contribute to their political campaigns?

TAKEAWAYS: You are free to contribute to a political campaign, provided you do so as a private individual using your own funds.



RESOURCES

[LEG-POL-065 Global Government Contracts Policy](#)

[LEG-POL-064 Global Anti-Bribery & Anti-Corruption Policy](#)

We Work with Parties Who Share Our Values

WHY IT MATTERS

We count on reliable and ethical business stakeholders to bring the best value to our business. The conduct of our business stakeholders reflects on our reputation at Quest Global. It is crucial that we select and work with business stakeholders who share our commitment to integrity.

OUR COMMITMENT

We choose business stakeholders who operate with the highest ethical standards and who are committed to following the law.

WHAT IS A BUSINESS STAKEHOLDER?

Quest Global business stakeholders include:

- Customers
- Vendors
- Suppliers
- Service providers
- Agents
- Intermediaries



HOW WE KEEP INTEGRITY AT OUR CORE

To work ethically with business stakeholders, we:

- Treat all our business stakeholders fairly and with integrity.
- Make sure all business stakeholders are committed to ethical business practices.
- Choose business stakeholders who best meet our business needs based on objective criteria such as quality, price, and service.
- Only use agents or intermediaries when there is a clear business case to do so.
- Properly verify the credentials and reputation of all business stakeholders with whom we work.
- Watch for, document, and fully investigate any unethical conduct by business stakeholders.
- Make sure any such unethical conduct is appropriately addressed.
- Make sure contracts and agreements include necessary security controls and confidentiality agreements.



INTEGRITY IN ACTION: WORKING WITH STAKEHOLDERS

SCENARIO: A contact at a critical vendor has told you that the vendor's company was recently added to a sanctions list because of emerging global geo-political conflicts. Your contact asks you to keep this information quiet while the company tries to work out a solution. How should you handle this situation?

TAKEAWAYS: You have an obligation to highlight this situation to the Quest Global Legal team. First, the relationship may violate sanctions law, and second, the vendor may be acting unethically by requesting that you not report the information. Most likely, the relationship with this vendor would need to be suspended or terminated immediately.



Integrity for Our Company

We Avoid Conflicts of Interest

WHY IT MATTERS

We avoid conflicts of interest because we make the best decisions for Quest Global when we are able to act objectively. Even the appearance of a conflict of interest could suggest that we are acting improperly. We show our good judgment and integrity by avoiding situations that could lead to a conflict and disclosing conflicts properly if they arise.

OUR COMMITMENT

We are committed to making the best business decisions for Quest Global. All employees are responsible for avoiding activities, investments, or relationships that could keep them from acting in the company's best interests. We make sure to disclose and manage any potential conflicts.

WHAT IS A CONFLICT OF INTEREST?

A conflict of interest exists whenever we take action or have an interest that could prevent us from performing our work honestly, objectively, and efficiently.

It is not possible to list every situation that could present a conflict of interest. However, conflicts commonly arise in these areas:

- Working at a second job where you perform services similar to what you're doing at Quest Global.
- Working a second job where you perform any service for a Quest Global customer, supplier, or competitor.
- Using confidential information for personal gain.
- Having a close friend or family member who works for a customer, competitor, or business partner of Quest Global. These situations are common and may be unavoidable, but we need to be careful that they do not create actual or perceived bias in business decisions.
- Employing relatives in the same department or in a supervisory relationship.





HOW WE KEEP INTEGRITY AT OUR CORE

To avoid and manage conflicts of interest:

- When possible, we avoid situations where our personal activities or relationships could prevent us from making objective business decisions.
- In cases where we can't avoid a conflict of interest, we report the conflict and consider mitigation actions. We seek help from a manager or the Legal team if we believe we may be involved in a conflict of interest.

INTEGRITY IN ACTION: CONFLICTS OF INTEREST

SCENARIO: Your sibling has applied for a job at Quest Global. You are a manager with hiring authority in the department for this position. What would YOU do?

TAKEAWAYS: Participating in a hiring decision for a relative would qualify as a conflict of interest. You must disclose the relationship and decline to participate in the hiring process for your sibling.



RESOURCES

[LEG-POL-068 Global Conflicts of Interest Policy](#)

We Give and Receive Gifts Responsibly



WHY IT MATTERS

Giving or receiving gifts, hospitality, and other courtesies can help strengthen our business relationships. But we can never allow these items to appear to influence a business decision.

We protect our reputation for integrity by basing our success solely on the value we bring our customers.

OUR COMMITMENT

We take special care when offering gifts or entertainment to or accepting them from business partners.

HOW WE KEEP INTEGRITY AT OUR CORE

To give and receive gifts responsibly, we only exchange business courtesies if they meet our guidelines. Gifts must:

- Be reasonable and modest in value.
- Be appropriate for the circumstances and culture.
- Not be, in actuality or in appearance, intended to affect a business decision or otherwise influence the recipient.
- Not be cash or cash equivalents.
- Be properly disclosed to Quest Global and to the recipient's employer, if needed.
- Not be provided to a government official, as more complex laws apply to these parties.
- Be in compliance with Quest Global policies and all local laws.

INTEGRITY IN ACTION: GIFTS AND ENTERTAINMENT

Giving a valued customer a gift such as a Quest Global branded backpack with two bottles of fine wine (valued at \$100 each) is *not* okay because the wine is not modest in value and could be interpreted as an attempt to influence the customer. The backpack alone has modest value and may be appropriate if it is not intended to influence a business decision.



RESOURCES

- [LEG-POL-064 Global Anti-Bribery & Anti-Corruption Policy](#)
- [LEG-POL-067 Global Gift and Entertainment Policy](#)

We Safeguard Private and Personal Data

WHY IT MATTERS

To run our business and fulfill legal and contractual requirements, Quest Global must collect and process some personal data. **Keeping data secure and using it properly helps protect our people and our business.** It also keeps us in compliance with privacy laws, which vary across different countries and regions.

OUR COMMITMENT

Personal data includes anything that could be used to identify someone, either directly or indirectly. We protect all personal data from any unintentional, illegal, or unauthorized access, disclosure, or theft. We comply with personal data privacy and protection laws everywhere we do business.

HOW WE KEEP INTEGRITY AT OUR CORE

To help safeguard private and personal data, we:

- Take individual responsibility to be aware of personal data requirements, including staying compliant with applicable training requirements.
- Collect only the minimum personal information needed for business purposes.
- Safeguard personal data through appropriate security practices to prevent unauthorized access.
- Provide clear information about how personal information may be used and by whom.
- Keep personal information only as long as necessary.

INTEGRITY IN ACTION: SAFEGUARDING PERSONAL DATA

Less sensitive personal data, such as business contact information, can be shared within Quest Global wherever there is a business need. More sensitive data, such as date of birth or bank account information, can only be shared with authorized individuals and only in instances where there is a clear business need for the recipient to access that specific personal data.

WHAT IS A PERSONAL DATA BREACH?

A personal data breach is the unauthorized disclosure of, or access to, personal data. If you suspect a personal data breach, contact your manager, the Ethics & Compliance team, and/or report the incident through the Speak Up Tool.



RESOURCES

[HUM-POL-382 Quest Global Personal Data Privacy Policy](#)



We Manage Our Records Responsibly

WHY IT MATTERS

Quest Global’s employees, shareholders, business partners, and regulatory agencies rely on the accuracy of our company records. Keeping these records up to date and storing them properly help us make good business decisions. These practices also help us meet the legal requirements that apply to company records.

OUR COMMITMENT

We follow all relevant laws to ensure that records are accurate, truthful, and appropriately managed.

HOW WE KEEP INTEGRITY AT OUR CORE

To manage our records responsibly, we:

- Make sure the information in our records is accurate, truthful, timely, complete, fair, and comprehensible.
- Maintain records in a secure environment.
- Never edit or discard records that have not met their retention requirements.
- Retain records in accordance with any legal hold order.
- Provide records promptly if requested as part of an audit or investigation.



WHAT IS A COMPANY RECORD?

Company records can include:

- Email (including attachments), social media posts, and text messages
- Policies and procedures
- Purchase orders and invoices
- Contracts
- Reports, analyses, formulas, schedules, tables, presentations, and financial models
- Personnel files
- Communication through instant messaging apps

If there is a legal hold order, it is illegal to delete relevant records.

We Protect Our Information Assets

WHY IT MATTERS

The continued success of our business depends on our information assets. By protecting our information systems, devices, and software, as well as the intellectual property and confidential information that belongs to Quest Global, we help keep our competitive advantage. And because we understand the importance of these assets, we must take care with the information that is entrusted to us by our customers and business partners.

OUR COMMITMENT

We are all responsible for safeguarding the information assets of Quest Global and others. Quest Global is committed to a strong and effective Information Security Management System (ISMS). We respect and uphold all national and international intellectual property and copyright laws and follow the guidance of our Global Business Excellence Policy.



WHAT ARE SOME EXAMPLES OF CONFIDENTIAL INFORMATION?

Confidential business information includes:

- Proprietary information, such as work processes or business plans
- Trade secrets, trademarks, and other intellectual property
- Non-public financial information (including pricing) and projections
- New product and marketing plans
- Customer and supplier lists
- Research and development ideas and information
- Manufacturing processes
- Procurement information
- Information concerning potential acquisitions or investments

INTEGRITY IN ACTION: CONFIDENTIAL INFORMATION

Using one customer's confidential information on another customer's account is unacceptable. You should never use proprietary or sensitive information that you gained on a different account or at another job when working at your current assignment.

HOW WE KEEP INTEGRITY AT OUR CORE

To protect our information assets, we:

- Only share confidential information with authorized employees who have a business need to access it, and make sure only authorized users access our devices and networks.
- Set strong passwords, change them regularly, and never share them with others.
- Only use an appropriately secured connection when accessing Quest Global networks remotely.
- Follow all information security practices according to Quest Global's Information Security Management System (ISMS).
- Never discuss confidential information in public places or make it potentially visible to others.
- Never email Quest Global or customer confidential information to a non-business (personal) email account.
- Only use software that has been approved by the Information Technology (IT) team on Quest Global-issued devices.

KEEPING INFORMATION SYSTEMS SECURE

Be alert about whether personal devices are allowed to be used for work purposes. It may be acceptable to use your personal phone or laptop to fill out a timesheet, for example. But in other cases Quest Global and our customers have strict restrictions on the use of personal devices. When in doubt, seek guidance.

- Don't accept information offered by a third party that may be confidential unless an appropriate nondisclosure or confidentiality agreement is in place.
- Never release any information about our customers or business partners that hasn't already been made public.
- Never use customers' logos, trademarks, or other intellectual property without their approval.
- Understand and follow any project-specific procedures to protect customers' intellectual property.
- Immediately report any possible security breaches so they can be addressed.
- Raise questions or concerns about the use or protection of information assets to a member of our Legal team or through the Speak Up Tool.



INTEGRITY IN ACTION: INTELLECTUAL PROPERTY

Intellectual property (IP), such as logos, is protected under trademark laws and cannot be used without written permission of the customer. Exceptions may be made by the Quest Global Legal team if the customer provides written approval for us to use their IP.

INTEGRITY IN ACTION: INFORMATION SECURITY

SCENARIO: I sometimes work remotely, so I email the documents I need to my personal email account for easy access. Is this okay?

TAKEAWAYS: No. You should never email confidential or proprietary documents to your personal email. This is true for many reasons, most importantly because it is not secure.



RESOURCES

[BET-L2D-330 Global Business Excellence Policy](#)

We Respect Our Financial Assets

WHY IT MATTERS

We keep integrity at our core by safeguarding our financial assets and records from fraud, waste, or abuse. Accurate and reliable records and accounts help us make good business decisions and allow us to provide complete and timely information about our performance to investors and regulators, in compliance with the law.

Careful financial practices also help us protect our communities from money laundering and the funding of terrorist or other criminal activities. We have a duty to prevent these activities and learn to recognize warning signs that they may be occurring.

OUR COMMITMENT

Quest Global follows all required procedures, accounting principles, and internal controls to protect our financial assets and records. These records include anything that could affect our reported financial condition or results, such as timesheets, invoice or expense reports, product, marketing, or administrative activities, or performance evaluations. We comply with the Singapore Companies Act and follow the Quest Global Financial Reporting and Business Intelligence Guidelines.





HOW WE KEEP INTEGRITY AT OUR CORE

To respect our financial assets, we:

- Follow generally accepted accounting principles, Quest Global recordkeeping guidelines, and related laws and regulations.
- Record all our assets, expenses, and transactions correctly, completely, and in a timely manner.
- Never bypass internal controls that apply to our work.
- Keep books, reports, receipts, and other financial records that accurately reflect our transactions.
- Never mislead anyone about our financial performance.
- Stay alert for signs that could indicate the funding of criminal activity.
- Immediately report any concerns through the Speak Up Tool or to a member of the Ethics & Compliance or Legal team.



RESOURCES

[FPA-OTH-042 Global Quest Financial Reporting and Business Intelligence Guideline](#)

INTEGRITY IN ACTION: RESPECTING OUR FINANCIAL ASSETS

SCENARIO: You realize after submitting your expense report that it contains a slight error. What would YOU do?

TAKEAWAYS: You should immediately report the error and correct it. Even a minor error compromises the accuracy of our financial records. Admitting mistakes when we make them is one of the ways we practice integrity.

We Secure Our Physical Assets

WHY IT MATTERS

Our many assets are vital for our daily work and the long-term health and growth of our business. They are the result of the collective effort of everyone at Quest Global, past and present. When we protect our assets, we protect our future.

OUR COMMITMENT

We each take personal responsibility for protecting our physical assets from misuse, theft, damage, or loss. Physical assets include all of Quest Global's physical property, such as our land, buildings, equipment, machinery, furniture, and supplies. We also protect the physical assets that belong to our customers, suppliers, and business partners.

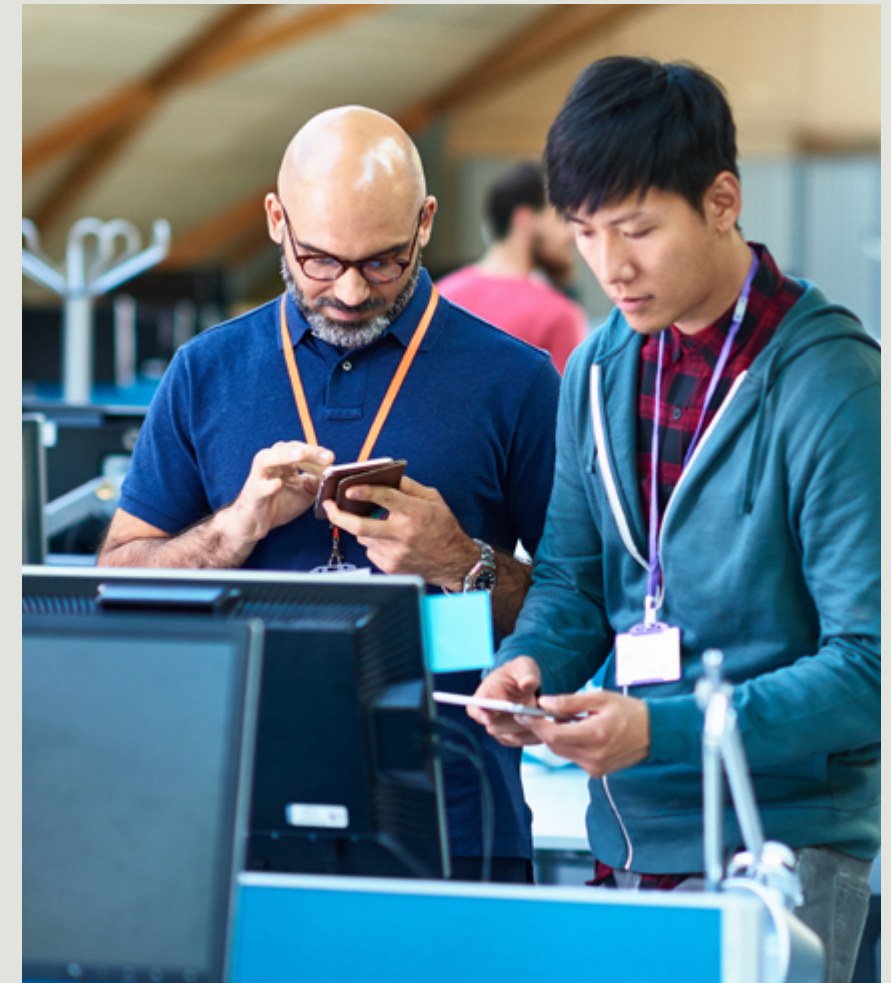
HOW WE KEEP INTEGRITY AT OUR CORE

To secure our physical assets, we:

- Keep confidential information, computer equipment, and devices secure at all times, including while at our workplaces and while traveling.
- Only allow authorized individuals to use our assets and access our facilities.
- Never remove assets from Quest Global property for personal use.
- Promptly report any misuse or abuse of company assets.

INTEGRITY IN ACTION: SECURING OUR ASSETS

Every employee is responsible for protecting Quest Global devices and other assets, both at Quest Global locations and while traveling. A theft or loss of a company laptop threatens our company assets as well as our data security.



RESOURCES

[FPA-POL-016 Global Fixed Asset Policy](#)

[OPC-POL-008 Global Asset Management Policy](#)



Integrity in Our Communities

We Are Responsible Corporate Citizens

WHY IT MATTERS

Giving back to society is as important to us as enabling innovations for our clients. At Quest Global, being socially responsible extends beyond altruism. We strive to use our unique talents and resources to help clients, society, and the world solve some of the hardest social problems. We put our integrity into action as caring and responsible corporate citizens.

OUR COMMITMENT

Through Corporate Social Responsibility (CSR), Quest Global takes responsibility for the impact of our activities on communities and the environment.

HOW WE KEEP INTEGRITY AT OUR CORE

To be responsible corporate citizens, we:

- Focus our social responsibility efforts on two challenging problems aligned with the United Nations Sustainable Development Goals of:
 - Gender Equality through advancing women in engineering.
 - Quality Education through supporting education for under-served communities.
- Invest our social responsibility efforts in the communities where we live and work.



- Partner with other organizations to advance shared Environmental, Social, and Governance (ESG) commitments.
- Promote diligence throughout our supply chain to prevent modern slavery and human trafficking.

BUILDING A BETTER TOMORROW THROUGH EDUCATION INITIATIVES TODAY

Far too many children worldwide are denied the fundamental right to an education. Whether the challenge is geographic, socioeconomic, or gender-based, the result is the same. Children who are provided with less education can grow up to have higher incarceration rates, fewer employment opportunities, lower lifetime earnings, poorer health, and shorter lifespans.

That is why the Quest Global Smile Engineering initiative, in partnership with India's Kerala-based NGO Nature's Green Guardians Foundation (NGGFN), opened two new learning centers in a previously underserved tribal forest community in the city of Trivandrum, India.

Our long-term commitment to the people of the region started by building infrastructure for our learning centers and equipping them with cutting-edge technology. It continues by providing education to both children and women, offering daycare and after-school services, and managing the facilities for years to come.

Being our customers' most trusted partner has always been at the heart of our business. We aspire to be our communities' most trusted partner as well.



We Protect the Environment and Promote Sustainability

WHY IT MATTERS

Our communities are at the heart of our business. A key part of protecting those communities is caring for the environment. Our people and our business depend on this environmental stewardship. **By promoting sustainability throughout our work, we help secure the future of our global community for generations to come.**

OUR COMMITMENT

We go beyond simply minimizing the environmental impact of our business. We work to improve the environment globally through conservation and sustainability efforts such as the [Quest Global Pledge](#).



HOW WE KEEP INTEGRITY AT OUR CORE

To help protect the environment, we:

- Align our environmental efforts with the United Nations Sustainable Development Goal of Climate Action by:
 - Focusing on de-carbonization and achieving net zero emissions in our organization.
 - Participating in efforts such as the [Quest Global Pledge](#) and other ESG initiatives centered on net positive climate change impact.
 - Working with our clients to reduce their greenhouse gas emissions through engineering solutions.
 - Partnering with other organizations to accelerate de-carbonization at scale.
- Follow all company policies and regulatory requirements for environmental protection.

QUEST GLOBAL PLEDGE TO PLANT 500,000 TREES GLOBALLY BY 2025

Contributing to a better tomorrow and giving back to communities where we live and work has always been part of our DNA at Quest Global. That's why, on World Environment Day, we launched the **Quest Global Pledge—to plant 500,000 trees globally by 2025**. This pledge will help us reduce over 113,000 tons of carbon emissions in the coming years.

Our first step: planting 500 trees across Pune in three months along with a local NGO partner, Y4D Foundation. We launched the tree plantation drive at the campus of Madhyamik Vidyalay, Mahalunge (Padale). The school's principal and volunteers joined us to plant 50 trees on campus. In attendance were representatives of Y4D Foundation and Vanarai, a national organization working towards sustainable rural development.

Vanarai's President called tree plantation "a critical undertaking by corporate players for ensuring a sustainable future."

The Quest Global Pledge is our way of creating an environmental imprint that lasts for generations to come. We emphatically believe sustainability is no longer about doing less harm. It is about doing more good.



RESOURCES

[HUM-GUD-213 Global CSR Framework Guideline](#)



Conclusion

ETHICS AND COMPLIANCE IS IN OUR DNA AT QUEST GLOBAL

At Quest Global, we strive to do the right thing and meet the highest ethical standards. We live our commitments with the help of our Code of Conduct. We recognize that ethical conduct is even more important than achieving our business results. We consult the Code of Conduct when we are faced with difficult business decisions. We Speak Up when we perceive any behavior that doesn't seem right.

When the Code of Conduct doesn't answer your question, contact the Ethics & Compliance team or Legal team for guidance.

Remember: we all play a role in ethics and compliance at Quest Global. Together, we keep integrity at our core.

RESOURCES (Accessible only with Quest Global Employee SSO Login)

BET-L2D-330 Global Business Excellence Policy

LEG-POL-069 Global Export Control Policy

FPA-OTH-042 Global Quest Financial Reporting and Business Intelligence Guideline

FPA-POL-016 Global Fixed Asset Policy

LEG-POL-068 Global Conflicts of Interest Policy

LEG-POL-067 Global Gift and Entertainment Policy

HUM-GUD-213 Global CSR Framework Guideline

HUM-POL-487 - North America Employee Handbook

HUM-POL-214 Global Speak Up Policy

HUM-POL-215 Regional Anti Sexual Harassment India Policy

HUM-POL-252 Regional Standards of Conduct and Interpersonal Communication Policy Spain

HUM-POL-382 Quest Global Personal Data Privacy Policy

LEG-POL-063 Global Antitrust and Competition Policy

LEG-POL-064 Global Anti-Bribery & Anti-Corruption Policy

LEG-POL-065 Global Government Contracts Policy

LEG-POL-066 Global Anti-Slavery and Human Trafficking Policy

MKT-POL-063 Global Press and Media Policy

MKT-POL-068 Global Social Media Policy

OPC-POL-008 Global Asset Management Policy

QMS – People Function Page

Speak Up Tool



Quest Global Code of Conduct | LEG-COC-001

Rev No.	Date	Changes/Updates	Drafted By	Approved By
01	15 Feb 2023	Initial Issue	E&C Team	Lindsey Gauthier
02	24 Oct 2024	Updated links to new QMS	E&C Team	Lindsey Gauthier