



Corporate Responsibility Charter

For QBS staff, publishers, partners and related third parties

QBS Commitment to Corporate Responsibility

QBS Technology Group (“QBS”) places corporate responsibility at the heart of its operations and as a cornerstone of its corporate commitments. QBS is a strong advocate of corporate compliance with regard to human rights, labour, environment and anti-corruption. QBS is a certified **B Corporation**. Certified B Corporations are businesses that meet the highest standards of verified social and environmental performance, public transparency and legal accountability to balance profit and purpose.

The relationship between QBS and any related third parties (collectively referred to throughout this document as “Third Parties” this includes but is not limited to publishers, suppliers, sub-contractors, distributors, partners, agents, resellers, customers, employees, representatives or any company or person with which QBS or any of its subsidiaries or affiliates has a business relationship) is fundamental to growing a sustainable business.

QBS and Third Parties are expected to comply with all applicable laws and regulations of the countries where they are registered and where operations are managed or services provided. The QBS Corporate Responsibility Charter (the “Charter”) represents a minimum standard of best practice.

QBS expects full compliance with the Charter by all Third Parties. In the event of a breach of the Charter by QBS, disciplinary action may be taken and steps will be taken to ensure future compliance.

In the event of a breach of the Charter by Third Parties, non-compliance may constitute a breach of their contractual obligations which may necessitate the termination of any business dealings with QBS. Third Parties are expected to ensure that their own business associates comply with the same requirements.

Certified



This company meets high standards of social and environmental impact.

Corporation

Contents

- Legal Compliance
- Human Rights
- Employment Practices
- Anti-Corruption
- Other Illegal Practices
- Conflict of Interest
- Protection of Information
- Environment, Health and Safety
- Global Trade Compliance
- Ethics and Compliance Policies



Legal Compliance

QBS and Third Parties must comply with all applicable laws and regulations including, without limitation, those protecting human rights, anti-corruption, money laundering, terrorism, antitrust, data protection, international trade compliance, health, workplace safety and those protecting the environment.

Human Rights

QBS and Third Parties are expected to ensure a commitment to human rights and to ensure that people are treated with respect and dignity and that diversity is encouraged. QBS and Third Parties are expected to remain receptive to diverse opinions, promote equal opportunity for all and to foster an inclusive and ethical culture.

Child Labour

QBS and Third Parties must ensure that illegal child labour is not used in the performance of work.

Human Trafficking

QBS and Third Parties must comply with any regulations prohibiting human trafficking and with all applicable local laws in the countries in which they operate. QBS and Third Parties must not violate the rights of others and must address any adverse impact their operations may have on human rights.



Employment Practices

Harassment and healthy working environment

QBS and Third Parties are expected to ensure that its employees are protected from physical, psychological and verbal harassment, or any other abusive conduct. QBS and Third Parties must provide a safe and healthy working environment for their employees.

Non-discrimination

QBS and Third Parties are expected to provide equal employment opportunity and treatment of employees. Employees or employment applicants should not be discriminated against on the grounds of ethnicity, sex, age, sexual orientation, trade-union membership, political or religious beliefs. QBS and Third Parties must try to provide a working environment that encourages the employment of people with disabilities.

Wage and Benefits

QBS and Third Parties must ensure that workers are paid at least the minimum compensation and benefits required by local law. Additionally, workers must be paid for overtime at such additional rate as is legally required or, otherwise, at least equal to their regular hourly payment rate. Deduction from wages as a disciplinary measure should not be permitted.

Working Conditions

QBS and Third Parties must respect the rights of workers to associate freely and communicate regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal. The rights of workers to exercise lawful rights of free association including joining or not joining any association of their choosing must be respected.

Weekly rest period

QBS and Third Parties must provide a weekly rest period of at least twenty four consecutive hours to all workers.



Anti-Corruption

QBS and Third Parties are required to comply with all foreign and domestic laws and regulations against bribery and corruption. Governance rules must be implemented within the organisation to comply with applicable laws and regulations. QBS and Third Parties are expected to provide training to employees on this subject.

Whether directly or otherwise, QBS and Third Parties will not propose any offer, promise, gift, present or benefit to any person with the purpose that this person abuses or makes illegitimate use of its influence to obtain advantage. This includes, but is not limited to, offering or making improper payments of money or offering anything of value to government officials, political parties, candidates for public office or other persons.

In any business relationship, QBS and Third Parties must ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation. These exchanges must not violate the rules and standards of the recipient's organisation and must be consistent with reasonable marketplace customs and practices.



Other Illegal Practices

Competition and Antitrust

QBS and Third Parties are required to comply with laws and regulations relating to the protection of competition and prohibiting antitrust practices. The principle of free price-setting must be respected and prices must not be fixed or bids rigged. QBS and Third Parties must not exchange competitively sensitive information (including, but not limited to, pricing information) with competitors and must refrain from participating in a cartel.

QBS and Third Parties holding a dominant position must not fix commercial conditions that could be characterised as excessive, discriminatory or loyalty-inducing or otherwise abusing their dominant position.

Insider Trading

QBS and Third Parties must not use any material or non-publicly disclosed information obtained in the course of their business relationship as a basis for trading or for enabling others to trade in the stock or securities of any company.

Fraud and Deception

QBS and Third Parties must not seek to gain advantage of any kind by acting fraudulently, deceiving people or making false claims.



Conflict of Interest

QBS and Third Parties are required to implement policies intended to avoid all conflicts of interest or situations which could lead to a potential conflict of interest. This includes a conflict between the professional activities and personal interests or those of their close relatives, friends or associates.

Audit Rights

QBS and Third Parties are expected to create accurate records and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. All records must fully and accurately represent the transaction or event being documented. Records should be retained based on the applicable retention requirements.



Protection of Information

Confidential/Proprietary Information

QBS and Third Parties shall properly handle sensitive information, including confidential, proprietary, and personal information. Information should not be used for any purpose other than the business purpose for which it was provided unless there is prior authorisation from the owner of the information.

QBS and Third Parties must comply with all applicable laws governing intellectual property rights assertions, including protection against disclosure, patents, copyrights, and trademarks.

Information Security

QBS and Third Parties must protect the confidential and proprietary information of others, including personal information, from unauthorised access, destruction, misuse, modification and disclosure, through appropriate technical, physical, organisational and electronic security measures which shall be revised from time to time to reflect at all times, at a minimum, industry standards.

Protection of Personal Data

QBS and Third Parties must comply with all applicable data protection regulations including the UK and EU GDPR (where applicable) and including laws, rules, governmental requirements, codes as well as international, federal, state and provincial laws.



Environment, Health and Safety

QBS and Third Parties shall establish an appropriate management system (ie, ISO 14001, ISO 45001, ISO 50001, etc) and promote the awareness of those policies. Good environmental stewardship is one of the key values of QBS. QBS has been independently verified as net carbon zero since 2021 and certified as a B Corporation in August 2022. QBS continues to look for ways to improve and takes full responsibility for its impacts on the environment and society.

QBS and Third Parties shall take appropriate measures to operate in a manner that:

- limits the environmental impact of their operations, particularly by reducing consumption of energy and production of waste and by improving prevention and control of all other potential forms of pollution
- actively manages, prevents and mitigates environmental and health & safety risks (avoid as much as possible use & exposure to hazardous materials, mitigate risks regarding storage conditions, manage possible re-use, re-cycle, transportation or disposal of waste, mitigate exposure to radiation, etc.)
- conserves natural resources, promotes sustainability and recycling of materials
- protects the environment in the communities within which they operate and all along their area of impact
- ensures that their goods, works or services do not have a negative/detrimental impact on biodiversity
- develops a positive contribution to the fight against climate change.

And, more generally, implement all protective measures to prevent any potential risk of damage to human or animal health and to the environment. Third Parties should protect the health, safety, and the welfare of their employees, contractors, visitors, suppliers and others who may be affected by their activities.

Finally, as stated in chapter, “Legal Compliance” of this Charter, Third Parties shall ensure that all their operations, including their own supply chain, comply with all applicable environmental, health and workplace safety laws and regulations.



Global Trade Compliance

Responsible Sourcing of Minerals

QBS and Third Parties must comply with applicable laws and regulations regarding sourcing of minerals such as, namely, tin, tungsten, tantalum and gold, from conflict areas (“Conflict Minerals”). QBS and Third Parties should establish a responsible purchasing & sourcing policy and audit, reviewing its supply chain on a regular basis to ensure that there is no risk of conflict minerals being embedded in the Client’s product or in the system equipment or systems they manufacture or sell.

Ethics and Compliance Policies

QBS and Third Parties are expected to establish management systems, commensurate with the size and nature of their risks and business to support compliance with laws and regulations, as well as the requirements expressed within the Charter. QBS and Third Parties are encouraged to implement their own written code of conduct and to flow down their principles to the entities that furnish them with goods and services.

QBS and Third Parties must maintain effective programmes to encourage their employees to make ethical, values-driven choices in their business dealings - beyond compliance with laws, regulations and contract requirements.



QBS

TECHNOLOGY GROUP

UK - Head Office

7 Wharfside, Rosemont Road
Wembley, HA0 4BQ

+44 (0)20 8733 7100

www.qbssoftware.com

UK

Retford Enterprise Centre,
Randall Way, Retford, DN22 7GR

+44 (0)1777 852222

www.qbssoftware.com

GERMANY

Grünwalder Weg 13a
82008 Unterhaching, Germany

+49 (0)89 231 4142 0

www.qbssoftware.de

UK

Queens Court, Wilmslow Road
Alderley Edge, Cheshire, SK9 7QD

+44 (0)330 122 2050

www.qbssoftware.com

FRANCE

51 rue Hoche, 942000 Ivry sur Seine
Paris, France

+33 (0)1 56 20 24 20

www.qbssoftware.fr

GERMANY

c/o Next Level Offices
Franklinstr. 9 - 11,
10587 Berlin, Germany

+49 (0)89 231 4142 0

www.qbssoftware.de

UK

Unit 5B, Kendall Business Park
Stafford Park 6, Telford, TF3 3BQ

+44 (0)333 101 1000

www.qbssoftware.com

STOCKHOLM

Wallingatan 34,
111 24 Stockholm, Sweden

+46 (8) 55121499

www.qbsdistribution.se