



QSS Code of Ethics and Business Conduct

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Purpose

All employees must conduct themselves and the business of QSS in a legal and ethical manner. This *Code of Ethics and Business Conduct* ("Code") sets out basic principles for all employees to follow in fulfilling their responsibility to conduct themselves accordingly.

Applicability

The Code applies to all QSS employees.

Policy statement

A reputation for integrity is one of the most valuable assets a company can possess. QSS's reputation has been built over many years and is dependent on the integrity and sense of responsibility demonstrated by all employees. The Code sets forth our commitment that all employees exemplify a high standard of ethical and legal conduct in all QSS's business practices. While compliance with applicable law is the foundation for the Code, all employees are expected to avoid unethical business dealings, whether actual or perceived, even when those business dealings may not violate applicable law. In many respects, the Code sets forth a higher standard than applicable legal requirements.



Responsibilities to Governments and the Law

Compliance with Laws, Rules and Regulations

All QSS business should be conducted in full compliance with applicable law. All QSS employees are expected to understand and comply with all laws affecting their work.

Antitrust Laws

Antitrust laws are designed to promote competition and to preserve the free system. Antitrust laws prohibit, among other things, price fixing, creation of a monopoly, boycotts, tying arrangements, exclusive dealing and refusals to deal. All QSS employees are expected to comply with applicable antitrust laws and not participate in any activity that could be considered a violation of antitrust laws. Violations of antitrust laws can result in civil and criminal penalties against QSS.

Anti-corruption Laws

QSS will comply with all applicable anti-corruption laws, which implies that QSS will not bribe or offer to bribe a foreign governmental or political official to obtain or retain business.

Improper Payments and Money Laundering

QSS is committed to compliance with anti-corruption laws. These laws prohibit improper payments, such as bribes, as well as offers or promises to make improper payments, whether or not the offer or promise is successful. Bribes (including offers or promises to make improper payments) are illegal and against QSS's policy, whether the conduct is engaged in by QSS colleagues or by any third party acting on QSS's behalf. Improper payments can involve offers, promises or payments of cash, future business, as well as gifts, travel expenses, entertainment, offers of employment, business meals, sponsorships, and charitable contributions. Improper payments include both inducements (pre-transaction) and rewards (post-transaction). Particular vigilance is required when dealing with government officials. QSS wants to maintain the highest standards of integrity in business relationships and ensure that those parties exhibit the same degree of commitment to those standards. In support of



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that policy, it is vital that QSS and its employees maintain relationships that are unencumbered by events or activities that may be construed as improper incentives. Employees may not receive from individuals or firms, directly or indirectly, gifts, entertainment or other favors that exceed what is generally considered common courtesy usually associated with ethical business practices. Gifts and entertainment provided to any government employee are prohibited. QSS complies with the financial crime, anti-money laundering laws in all jurisdictions where it does business. QSS will conduct business only with reputable parties that are engaged in legitimate business activities, with funds derived from legitimate sources. QSS cannot accept funds known to be derived from illegal activities. Persons involved in criminal activities may try to launder their funds through legitimate activities, such as the purchase of insurance products or services. Anti-money laundering laws prohibit us from engaging in transactions that involve funds derived from illegal activities, including transactions designed to promote or conceal illegal activities.

Trade Compliance Laws and Regulations

QSS employees are responsible for complying with all applicable laws and regulations that control the use of QSS products and software, the transfer of technical data or the provision of technical services. Compliance policies and procedures that all employees must dictate how QSS delivers software, disclose technical data or provide technical assistance.

Lobbying Activities

No employee of QSS may officially represent QSS in making contacts on QSS's behalf with any federal or local government official or member or employee of a legislative body or government agency for the purpose of influencing policy, legislation, agency rules or regulations or any other official action.