

At QNB Group (QNB or the Bank hereafter), an emphasis on the way of doing things is just as important as what we do. It is QNB's policy to conduct all business in an honest and ethical manner. QNB takes a zero-tolerance approach to bribery and corruption and in implementing and enforcing effective systems to counter bribery and corruption.

Purpose:

The purpose of this policy statement is to describe QNB's responsibilities and of those working for the Bank in observing and upholding its position on bribery and corruption. It covers key principles and responsibilities for preventing and combating bribery and corruption. It serves to raise awareness among QNB personnel to avoid actions connected to bribery and corruption, the consequences of corrupt actions and the proper use of whistleblowing channels to encourage confidential reporting of suspicions through the appropriate communication channels in order to protect the Bank's image and reputation.

Scope:

This policy applies to the entire QNB workforce, operations, subsidiaries, affiliates and overseas branches in all dealings and transactions at all countries where QNB operates. Any person working for the Bank, under a contract of employment or otherwise and all third parties who perform services for or on behalf of the Bank acting on behalf of QNB, are required to read, understand, and abide by this policy statement and by the related process maintained by QNB.

Responsibilities:

The Board of Directors (BOD) of QNB are responsible for approving and overseeing the implementation of this policy.

The Senior Management of QNB are responsible for establishing all necessary procedures for the appropriate implementation of the Policy and for the training of their personnel in bribery related matters in order to ensure continuous awareness and compliance.

Group Compliance Division at QNB manages anti-bribery and corruption aspects and supports the BOD and Senior Management at QNB in fulfilling related obligations. Group Compliance maintains responsibility of periodically reviewing the appropriate implementation of the policy and when necessary training of employees on bribery and corruption related matters.

All employees and personnel associated with QNB are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. Employees are obliged, if they have reason to believe or suspect that, an instance of bribery or corruption has occurred or will occur in the future to report accordingly as per the whistle-blowing mechanism.

Definitions:

- Bribery, in broad terms, is the receiving or offering of undue reward or anything of value and includes payments to secure a business advantage, financial or otherwise, to which the bank is not entitled. Bribery is defined as the promise, offer/acceptance directly or indirectly of anything of value to induce or reward the improper performance of an activity.
- Corruption is defined as the misuse of entrusted power for personal or private gain. While the primary focus of anti-corruption is on bribery, other forms of corruption include, but not limited to, embezzlement, theft, fraud, extortion, conflict of interest and illegal charitable / political contributions. It is also an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

Broad Principles:

- In particular, directly or indirectly offering, giving, soliciting or receiving any form of bribe, kickback or other corrupt payment, or anything of value, to or from any person or organization, including government agencies, individual government officials, public officials, private companies and employees of those private companies under any circumstances is prohibited.
- It is prohibited for bank employees to ask for or receive gifts from customers, suppliers or other third parties that they have relations with on behalf of the Bank, directly or indirectly. These principles also apply to gifts to be given to the family and kin of the employee by the said parties.
- Where QNB engages third parties, it has the obligations to complete sufficient due diligence when entering into arrangements to ensure that they are not acting corruptly.
- This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties and the given receipts of gifts and are according to the limit set out in the related procedure. Exchanges of reasonable and courtesy business gifts and hospitality are part of our business practices and allowed if they are transparent, proportional, reasonable and of a bona fide nature and following the stringent protocol in place at QNB.
- All bank employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by the Bank.
- QNB permits charitable donations (with prior approval) and sponsorships but these must not be offered to gain a business advantage. Donations should only be made to valid registered charitable organizations and foundations that the Bank do not have any conflict of interest with.
- QNB Group shall not make any political donations, which means donations for political purposes to any politician, political party or related organization, official of a political party or candidate for political office in any circumstances directly or through a third parties.
- In any case, offering or receiving gifts in the form of cash, irrespective of the amount, is strictly forbidden.

Failure to ensure compliance with this Policy could lead to the following consequences for QNB Group

1. Criminal or civil liabilities for the Bank including fines and imprisonment;
2. Serious reputational damage including media coverage for the Group;
3. Financial losses;
4. The unenforceability of contracts entered into as a result of acts of bribery, fraud or other illegality

Training:

All QNB Group employees have a primary responsibility to comply with this policy and related requirements. QNB provides appropriate and clear anti-bribery and anti-corruption awareness and trainings on a regular basis to all employees. Employees are expected to adopt the highest standards of professional and personal behaviors and demonstrate respect, integrity, good judgment, honesty and trust, the right way in all actions, no matter the circumstances.

Disciplinary Action

Failure to comply with this policy, whether or not this is intentional, may lead to disciplinary action and criminal liability for the individual involved in line with Human Capital Global policy.

Reporting:

QNB ensures that the appropriate tools are provided to employees for reporting suspicions or violations in confidence (whistle blowing) in case of bribery and corruption incidents.