



QNB Group Whistleblowing Statement

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Summary Profile

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Scope

QNB Group (QNB or the Group hereafter) is committed to establishing the highest standards of openness, probity and accountability. In line with this commitment, QNB encourages all internal and external stakeholders with serious and genuine concerns, about any aspect of the Group's work, to come forward and voice those concerns without any fear of retaliation. This statement is an overview of our internally established whistleblowing policy and the related procedures.

Purpose

The purpose of this statement is to describe QNB's approach to encourage people to report wrongdoings for a better working environment and describe the measures to protect them from retaliation. It serves to raise awareness for 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.

Who is a Whistleblower?

For QNB, whistleblower means all internal and external stakeholders, including but not limited to all current and former employees, directors and officers, and anyone who has a business relationship with the Group.

When to Whistleblow?

Issues that can lead to whistleblowing are listed below, but are not only limited to the following:

- Violations of governmental regulations/ breach of statutory laws
- Improper conduct
- Corruption
- Falsification/Destruction of company records
- Discrimination
- Conflicts of Interest
- Falsified reporting
- Embezzlement and frauds
- Privacy violations
- Health and safety risk, including risk to public as well as to other employees
- Damage to environment
- Abuse of power or use the Group's powers and authority for any unauthorized or personal gain
- Misuse of the Bank's assets
- Money Laundering and/or Terrorist Financing
- Attempts to suppress any information relating to any of the above, or any other indications of unethical or illegal practices

How to Raise a Concern

All potential wrongdoings may be submitted to whistleblowing@qnb.com, which is established by QNB as a dedicated channel to be used for whistleblowing, managed independently by QNB Group Compliance.

The whistleblowing channel is available 24/7 and can be used in all local languages, ensuring that whistleblowers can report any wrongdoing confidently and at any time.

There is information that needs to be provided as much as possible by the Whistleblower to help initiate an investigation that includes at a minimum but not limited to:

- Type of incident
- Brief details of incident - i.e. time, place, occurrence, activity, involved individuals, etc.
- Triggers of the incident
- Any evidence to help support the intended allegations
- Any other relevant information that could help provide further clarity to successfully proceed with the investigation

What happens after whistleblowing report?

- A preliminary enquiry will be conducted to determine if a full investigation should be undertaken and by whom. Moreover, as part of the enquiry, you may be contacted for further information.
- You can provide as much factual information and evidence as possible in order to allow the investigation to proceed.
- You should be prepared to be contacted by the related QNB Staff and provide the required information you know about the allegations to proceed with the investigation.
- Moreover, evidences or supporting documents may not be obtained for which you do not have a right or privilege of access.

Safeguards and Protection

- QNB has established a global policy to ensure the confidentiality and protection of whistleblowers. This policy includes robust structures designed to process whistleblower reports independently, and defines dedicated teams responsible for handling whistleblowing reports and managing them in accordance with established policies. QNB has taken all necessary measures to ensure that reports are handled securely and effectively.
- In cases requiring escalation, the matter will be addressed at the highest levels of governance, including senior management and Board level, ensuring robust safeguard and protection measures are in place.

- QNB recognises that the decision to report a concern can be a difficult one to make, at least because of the fear of retaliation from those responsible for the malpractice.
- QNB encourages you to share all the information you have concerning the suspected wrongdoing. Providing sufficient details will help QNB Group in conducting a thorough and effective investigation.
- Reports will be treated confidentially and the whistleblower identity will remain anonymous.
- QNB will not tolerate harassment or victimisation and will take action to protect the whistleblower when she/he raises a concern in good faith.
- The rights of any person implicated by the reported incidents will be respected including defence, confidentiality and fair investigation.
- We conduct annual mandatory training for all QNB staff to ensure they are well-informed about whistleblowing and the importance of maintaining the highest ethical standards

Qatar National Bank (Q.P.S.C.)
P.O. Box 1000, Doha, Qatar
Tel: +974 4425 2444
Fax: +974 4441 3753

qnb.com