



## 1. Principle Statement

The Company (hereinafter refers to Qatar Petrochemical Company (QAPCO) Q.P.J.S.C. and the companies operated by QAPCO) is committed to conducting business in compliance with the principles established in its policies, procedures, laws and regulations applicable. It likewise is committed to the highest standard of ethical business conduct with zero tolerance for any form of bribery or corruption. The Company works pro-actively to ensure that corruption does not occur throughout its operations.

## 2. Objective

The objective of Anti-Bribery and Corruption Policy is to define the Company global standard and minimum compliance requirements on anti-bribery and corruption and its obligations to comply with all applicable anti-bribery and corruption laws in Qatar and internationally.

## 3. Scope

Compliance with this Policy is mandatory for directors, officers, employees (collectively "Employees"), independent consultants and seconded personnel (collectively "Consultants") agents, intermediaries and other representatives acting on the Company's behalf (collectively "Agents") and its wholly-owned subsidiaries.

The Company expects its business partners (suppliers, contractors, customers, joint venture partners and ventures, in which the Company holds a minority interest) to adopt and follow similar standards of business conduct.

## 4. Policy

It is the policy of the Company that all Employees, Consultants and Agents are prohibited from offering, authorizing, giving, paying, soliciting, accepting or receiving, either directly or indirectly, a bribe to or from any employee, official, including public official, or agent of any government, public or commercial entity, or individuals, in connection with the business or activities of the Company. This includes the giving or receiving of an improper advantage through undue influence, preferential treatment or any form of improper payment. The making or receiving of facilitation payments is prohibited.

The above prohibitions do not apply to the situations where an individual's health, life and liberty are at risk.

## 5. Business Record Keeping and Internal Controls

In accordance with the record keeping provisions of the applicable laws and regulations, including



anti-bribery and corruption laws, and accounting and financial reporting standards, the company requires that accurate accounts and records must always be maintained, including a system of effective internal controls. The associated company records must be accurate, made in a timely manner, complete and include sufficient detail such that the purpose and amount of the transaction is clear. No false, misleading or artificial entries must ever be made in the company accounts and records for any reason.

## 6. Consequences of Non-Compliance

Failure to comply with applicable anti-bribery and corruption laws may have extremely serious consequences for the Company and its affiliates and the individuals involved. A breach of this policy may result in the Company and any relevant employee, consultant or agent being subject to criminal and civil proceedings that may result in damage claims, significant fines and/or possible imprisonment. The Company's reputation may also be damaged through adverse publicity or by Jeopardizing its organizational goodwill.

Employees and Consultants who do not comply with the requirements of this policy may be subject to disciplinary action, up to and including termination of employment (or the severance of a contractual consulting or secondee relationship). Agents must also comply in accordance with the terms of their contractual obligations.

## 7. Document References

#	Document ID	Document name	Summary of dependency or use
1			

## 8. Revision History

Rev #	Date	Section No.	Reason for revision / modification
01	10/02/21	All	<ul style="list-style-type: none"> <li>A new Policy created and detached from <a href="#">PR-310-HR-01</a>.</li> <li>Document Updated to align with QP Policies</li> </ul>