



## 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 in the State of Qatar. The Company is committed to the highest standard of ethical business conduct with zero tolerance to any form of fraud.

## 2. Objective

The objective of Anti-Fraud Policy is to define the Company global stance on and minimum compliance requirements for prevention of fraud and its obligations to comply with all applicable 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") and agents, intermediaries and other representatives acting on the corporation's behalf (collectively "Agents") of the Company 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

The Company prohibits all Employees, Consultants and Agents from engaging in any form of fraudulent activities. All Employees, Consultants and Agents must ensure they are aware of their responsibilities under this policy and their obligations to report all actual or suspected fraudulent activities as defined in the relevant policies and procedures.

The primary responsibility for prevention and detection of fraud rests with the line management and functions mandated to establish and maintain effective systems of internal controls and fraud detection activities.

Management is responsible for establishing and maintaining the control environment. This includes creating an environment where fraud is not tolerated, identifying risks of fraud and taking appropriate actions to ensure that controls are in place to prevent and detect fraud and incidents are reported.



P-HC-002 Rev.01

Anti-fraud Policy

Internal

All suspected fraudulent action will be investigated by Internal Audit in accordance with approved mandate and the company speak Up procedure [PR-310-HR-10](#).

## 5. Definitions

For the purposes of this policy, fraud is defined as the act of deliberate misrepresentation, deception or violation of trust, including intentional, false representation or concealment of material facts for personal gain, or in order to secure a personal or business advantage or with the intention of inducing another to act in a detrimental manner to another.

The fraudulent activities include, but not limited to, such acts as deception, forgery and falsification of documents, extortion, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion.

The fraudulent activity might occur on a standalone basis or as part of other acts of misconduct such as bribery, corruption, and conflict of interest.

## 6. Consequences of Non-Compliance

Employees, contractors 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).

## 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 P-130-PSS-0 – Corporate Governance Policy</li> <li>Document Updated to align with QP Policies</li> </ul>