



## 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 the principles of free, transparent and fair competition. While it will vigorously compete for new business, it will always comply with the competition and anti-trust laws applicable to its operations in the State of Qatar and globally.

## 2. Objective

The purpose of this policy is to define the Company global standards of fair competition and obligations to comply with the competition and anti-trust laws domestically and internationally, as applicable to the company' business.

## 3. Scope

This policy is mandatory to be complied with by directors, officers, employees (collectively "Employees"), independent consultants and seconded personnel (Collectively "Consultants") and agents, intermediaries and other representatives acting on the Company behalf (collectively "Agents") and the Company wholly owned subsidiaries.

## Policy

The Company is committed to the principles of free, transparent and fair competition in compliance with applicable competition and anti-trust laws and regulations. It does not engage in anti-competitive conduct, acting illegally or unethically when dealing with its customers, competitors, suppliers, contractors or joint venture partners. This includes unreasonable restraint of trade, unfair trade, exclusionary practices or other anti-competitive behavior. such as:

- Entering into agreements or understandings with competitors that restrict full and fair competition;
- Fixing of sale or purchase prices or other associated terms of sale or purchase of products;
- Setting of restrictions on capacity or output;
- Dividing markets or customers;
- Exclusion of competitors from a market or markets;
- Limits placed on the quality of competition, supply or related research;
- Abuse of market position:
- Any unconscionable or misleading conduct with the intention of gaining an unfair business advantage;
- or
- The sharing of non-public and commercially sensitive information with competitors in breach of applicable law; and/ or
- Unauthorized disclosure to other third parties.



#### 4. Commercially Sensitive Information

Commercially sensitive information is information considered to be particularly sensitive from a commercial and/or competitive perspective as it may influence competitive conduct on the market. It includes confidential information which is non-public, non-generalized and of a current, recent or predicted nature.

Examples may include information contained in QAPCO related tenders, technical bid submissions, sales contract and purchasing agreements. It also includes pricing policies, market strategies, pricing, margins, cost data, buyer identities, markets, product destinations, production volume and usage. Supplementary steps must be taken to ensure that information of a commercially sensitive nature is protected with access restricted to designated individuals. Likewise, unauthorized disclosure of such information, whether to internal or external parties, is strictly prohibited.

Further information regarding the handling of commercially sensitive information can be found in the company information classification management [IN-440-IS-02](#).

#### 5. Employee Responsibilities

Employees, Consultants, Contractors or Agents must never engage in discussions or activities that could lead to the allegation or appearance of improper behavior. Even passive participation in a meeting where a questionable discussion is taking place can put them and the company at serious risk.

Employees, Consultants, Contractors and Agents must promptly inform the company Legal Department of any such concerns. The company Legal should always be consulted if there is any doubt about the application and interpretation of any competition and/or anti-trust laws or any alleged behavior that is in violation of this policy.

#### 6. Consequences of Non-Compliance

Failure to comply with applicable competition and anti-trust laws in relation to anti-competitive practices may have extremely serious consequences for the Company 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 jeopardizing its organizational goodwill.

Employees and Consultants who do not comply with the requirements of this policy are 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.



P-PG-001 Rev.01

Competition Policy

Internal

## 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 to align with QP Policies</li> </ul>