



1. Principle Statement

Maintaining the confidentiality of information belonging to the Company (hereinafter refers to Qatar Petrochemical Company (QAPCO) Q.P.J.S.C. and the companies operated by QAPCO) is essential for competitive, security and other business reasons, as well as to comply with applicable securities laws and regulations. The Company expects that confidential information obtained during its business activities must be protected and should only be disclosed when authorized in accordance with the requirements set out in this policy.

2. Objective

The objective of this Confidential Information Policy is to define the Company's global stance and minimum compliance requirements and obligations around the protection of confidential information of the Company, and confidential information belonging to third parties and provided to the Company in connection with the Company's activities.

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 Company's behalf (collectively "Agents") of the Company and its wholly-owned subsidiaries.

4. Policy

It is the policy of the Company that employees and consultants must not disclose confidential information obtained during their employment or contractual engagement with the company, unless authorized to do so and to the extent strictly necessary to perform their duties. This includes disclosure to family members, friends, associated persons or other third parties.

The Company employees and consultants are expected to protect the Company assets, intellectual property and commercial information efficiently to advance the interests of the organization. Information belonging to third parties but made available to the Company for legitimate business reasons, must also be protected and kept confidential.

Employees and consultants must use reasonable precautions to restrict access to confidential information in accordance with this policy and applicable laws. This includes ensuring that the transmission of documents by electronic means occurs only when and where it is reasonable to believe that the transmission can be made and received under secure conditions. It also means that





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confidential information is kept in a secure place to which access is restricted and is promptly removed or destroyed when no longer required.

These obligations remain in effect beyond termination of the Company employment contract, contractual agreement or board appointment.

5. Confidential Information

For the purpose of this policy, confidential information includes any and all non-public information proprietary to the Company, including directly and indirectly obtained, disclosed, or provided to, by or on behalf of the Company, in any format and irrespective of the media on which it is contained, acquired or produced by the Company or its affiliates.

It likewise includes information belonging to third parties and provided to the Company in the course of business, including that pertaining to customers, suppliers, employees, joint venture partners, subsidiaries and/or other third parties, including that which relates to the employees, assets and/or affairs of the applicable organizations. Knowledge of confidential information about another party gained during the Company work related duties must be protected in the same manner as confidential information pertaining to the Company's operations.

The following are examples of confidential information:

- Information about contractual arrangements and other business dealings between suppliers, contractors, joint venture partners or customers that has not been publicly disclosed;
- Information about pending Company transactions including proposed acquisitions or dispositions;
- Financial results pertaining to the Company's organization or any other accounting or cost-related data;
- Information pertaining to the Company's long term strategies or annual operating plans and budgets;
- All the Company documents, records, memoranda, emails, whether in printed or electronic format.

In order to preserve confidentiality, employees and consultants should:

- Limit the disclosure of information within the Company organization to those with authorized access and that require it for legitimate the Company related business matters
- Limit the removal of confidential information from the Company premises;
- Ensure unauthorized replication of information does not occur;
- Not leave confidential information unattended or in unlocked locations; and
- Discuss confidential the Company information in public areas





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For further details on classification of confidential information, Refer to Section 7.4.2 of IN-440-IS-02 – Information Classification Management

6. Intellectual Property

For the purposes of this policy, intellectual property includes patented inventions, designs, copyright materials, trademarks and other trade secrets.

Employees and consultants must give proper attention to protecting the Company intellectual property and to avoid infringement of the intellectual property rights of others.

7. Commercially Sensitive Information

Commercially sensitive information is a subset of confidential information. It is considered to be particularly sensitive from a commercial and/or competitive perspective as it may influence competitive conduct on the market.

Commercially sensitive information includes confidential information, which is non-public, non-generalized and of a current, recent or predicted nature. Examples may include information contained in the Company 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 all information of a commercially and competitively sensitive nature is protected with access restricted to designated individuals and only disclosed on a need-to-know basis and strictly to the extent required for the performance of relevant job duties. Likewise, unauthorized disclosure of such information, whether to internal or external parties, is strictly prohibited.

8. Consequences of Non-Compliance

Non-authorized disclosure of confidential information must be immediately reported to the direct superior or the relevant management team member.

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.

9. Document References

#	Document ID	Document name	Summary of dependency or use
1			
2			





10. Revision History

Rev #	Date	Section No.	Reason for revision / modification
01	10/02/2021	All	<ul style="list-style-type: none">A new Policy created and detached from P-130-PSS-0 – Corporate Governance PolicyDocument Updated to align with QP Policies

