



## 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 a manner that ensures undue personal interests do not interfere with the objective and effective performance of its work and decision-making abilities. When an individual's personal interests influence, have the potential to influence, or are perceived to influence the performance of work or their decision-making capabilities, a conflict of interest may result.

## 2. Objective

The purpose of this policy is to define the Company's global standard of dealing with the potential perceived or actual conflicts of interest.

## 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 corporation's behalf (collectively "Agents") and the company's wholly owned subsidiaries.

## 4. Policy

It is the policy of the Company that all Employees, Consultants and Agents must avoid any conflict between their personal interests and the interests of the Company. Professional duties must always be performed, and business decisions made objectively and with the companies' best interests in mind and individuals must avoid situations, relationships or activities where a conflict exists, has the potential to exist, or could be seen to exist. Conflicts of interest must be avoided by taking actions or making decisions to ensure that they do not occur.

The Company prohibits Employees, Consultants and Agents from using their position with the Company, its corporate assets, or any information obtained through their employment or contractual relationship, for personal gain. All Employees, Consultants and Agents are responsible for reviewing their external business interests, personal interests, family and other close relationships, for potential, perceived or actual conflicts of interest, and disclose prior to engaging in the conduct in question.

Employees and Consultants must ensure that conflicts of interest, actual, perceived or potential are disclosed in accordance with the Company Conflicts of Interest Declaration Procedure. They must remove (recuse) themselves from decisions where their judgment or the ability to act in the Company's best interests may be affected.



## 5. Conflicts of Interest

A conflict of interest can arise when an Employee, Consultant or Agent takes actions or has personal interests that may affect their impartiality with respect to their related work responsibilities. This can occur when personal interests interfere, may interfere or create a perception of interference with the interests of the company and where such personal interests unduly influence business judgments, decisions or actions. They may create situations in which competing interests affect the ability to make unbiased or objective decisions on behalf of the company.

For the avoidance of doubt, and without limitation, conflicts of interest include the following:

1. The use of the company time, material, equipment, transport, financial assets, facilities or other resources for purposes not directly related to the company’s business objectives;
2. The holding of a direct or indirect interest in or business relationship with a party conducting business with the company. This excludes the holding of an interest in a publicly listed company to the extent such a holding does not exceed the applicable materiality threshold.
3. Participating in activities similar to, competing with or related to those of the company.
4. Performing work for others, with or without payment, in person or by an intermediary, even if outside of official company’s working hours, except where such work is of an educational, social or charitable nature and has received prior, written consent of the company.
5. When financial, non-financial, social or personal considerations may compromise impartiality and affect performance of job responsibilities by the Employee, Consultant or Agent;
6. When gifts and hospitality are offered or exchanged that breach the provisions of or exceed the limits defined in the company’s Code of Conduct, Anti-Bribery and Corruption policy, Conflicts of Interest Declaration Procedure or any other relevant procedural documents: and / or
7. Supervising or a direct supervisory reporting relationship with an Immediate Family Member (First of Ken) of up to two direct supervisory reporting levels.

## 6. Consequences of Non-Compliance

Failure to comply with the requirements of this policy, including the timely disclosure of the conflicts of interest in accordance with the Conflict of Interest Declaration Procedure may result in 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>