



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 its business in compliance with all applicable laws related to its business activities. All the company stakeholders must act accordingly in accordance to the laws, customs and traditions of the state of Qatar, including compliance with any rules and regulations issued by relevant authorities.

2. Objective

The objective of this policy is to define the company standards relating compliance with applicable laws and regulations, domestically 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.

4. Policy

It is the policy of the Company to comply with all laws and regulations applicable to its operations and to conduct those operations to the highest ethical standards. The Company expects its suppliers, contractors, joint venture partners and other business affiliates to comply with all applicable laws and regulations when providing products and services to the Company.

5. Permits and Licenses

All applicable licenses, permits and government authorizations should be obtained and maintained if and when required under the applicable law.

6. Accurate Business Records

All the company's Employees, Consultants and Agents must keep accurate and truthful business records that comply with legal, financial and regulatory requirements. False, misleading or incomplete information must never be recorded. In addition, off the book or secret accounts must never be used nor should internal controls be overridden. Employees and consultants should never issue any documents that do not properly and fairly record the transactions to which they relate.

Likewise, the company records must never be altered, falsified, hidden or disguised in order to alter





the nature of the transactions. All business records must be retained in accordance with the company policy and applicable legal and regulatory requirements.

7. Sanctions Compliance

The Company is committed to preventing, detecting, and deterring suspected terrorist financing activity and to ensuring that neither it, nor its products or services, are used to facilitate, directly or indirectly, violations of applicable economic or trade sanctions. In addition to complying with the applicable laws of the State of Qatar, the Company complies globally with sanctions promulgated by all applicable sanctions and import and export controls legislation regulated by certain countries and international organizations including but not limited to the United Nations Security Council, the European Union, the United Kingdom and the United States (collectively “applicable sanctions”). The Company policy prohibits any activity by its business that would breach applicable sanctions.

It is our policy that the Company maintains a sanctions control framework which establishes the companies requirement and minimum procedures designed to ensure compliance with the Company’s sanctions obligations globally as follows (including but not limited to the following):

1. Implementing an adequate risk-based system of sanctions and export compliance procedures and controls and ensuring compliance with the above legal and regulatory obligations.
2. Implementing a sanction screening of counterparts and risk-based due diligence processes and controls to ensure the Company does not engage in dealings with sanctioned entities or prohibited parties.
3. Implementation of a procedural framework.

Consultants and Agents may maintain different sanctions control framework which establishes minimum procedures designed to ensure compliance with the Company’s sanctions obligations.

8. Insider Trading

Employees, Consultants and Agents are prohibited from using or providing to other confidential and/or non-public insider information with the aim of buying or selling stocks or other securities. This includes information belonging to the company, its joint venture partners, subsidiaries and any other entity where the company has a participating interest, including suppliers, customers or other third-party associates.

For the purpose of this policy, insider information is information and knowledge that is not publicly available and can include but is not limited to the following:

- Production data, financial results and other related operational information
- Pending announcements regarding a new product, service, partnership or new business venture.
- Strategic plans, budgets or other strategic initiatives.



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- A pending acquisition or sale of a material asset.
- The signing or termination of a material control or other business arrangement.
- On-going litigation including related settlement or arbitration terms.

Certain employees are prohibited from trading in shares or other securities due to the nature of their roles at the company, its subsidiaries or joint ventures. These employees are included on the company insider trading list which outlines the scope of their applicable prohibitions in alignment with the role they fill within the company organization.

9. Anti-Money Laundering

The Company is committed to comply with applicable anti-money laundry regulations. It will only perform financial transactions with verified recipients and financial institutions for legitimate and substantiated expenses and in accordance with properly executed contractual commitments.

Money laundering occurs when the proceeds of crime are hidden in legitimate business dealings, or when legitimate funds are used to support criminal activities, including terrorism. The Company employees and consultants must be cognizant of suspicious transfers. It expects all such relationships and/or exchanges to undergo a rigorous review in accordance with the Company's due diligence standards. This includes for all customers, suppliers, joint venture partners or any other thirds parties, especially whereby unusual or suspicious monetary requests are sought.

Concerns around the source or use of funds, irregular payments or unusual transactions must be brought to the attention of the Company Internal Audit Department as and when the concerns present themselves. This means that employees, consultants and agents need to be familiar with and understand the identity of the people and organizations with which the Company does business.

10. Personal Data Protection

The Company is committed to comply with the applicable laws enacted by the State of Qatar relating to the protection of personal data. It is our policy that the Company fulfil the obligations imposed by Law No. 13 of 2016 enacted by the State of Qatar relating to the protection of personal data while processing data relating to identifiable individuals using electronic means. Personal data shall be protected through privacy law frameworks taken into account the following principles:

- Fair and lawful processing of personal data, including requirements to disclose to individuals the manner and purposes for which personal data will be processed before processing starts.
- Implement appropriate administrative and technical measures for the security of personal data, and





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- A reiteration of the principle that electronic marketing to individuals may only be carried out on the basis of the individual's prior consent.

11. Consequences of Non-Compliance

Failure to comply with all laws and regulations applicable and this policy 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 internal disciplinary action and or 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, Consultants and Agents 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 or secondee relationship, as appropriate).

12. Document References

#	Document ID	Document name	Summary of dependency or use
1			

13. Revision History

Rev #	Date	Section No.	Reason for revision / modification
01	10/02/21	All	<ul style="list-style-type: none"> • A new Policy created and detached from P-130-PSS-0 – Corporate Governance Policy • Document Updated to align with QP Policies

