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Code of conduct



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CEO's Message

QAFCO is well-known for supplying high quality products to the global market. Underlying this commitment is the professional pride of QAFCO employees and their dedication to principled business practices; this is the core of QAFCO's identity and the foundation for its success.

However, QAFCO's continued success requires the ability to adapt to meet the evolving needs and requirements of a variety of market forces in a dynamic business environment in a manner consistent with our core values of integrity and business ethics.

This Code of Conduct is your "GPS" for navigating a complex business environment in accordance with QAFCO's values. Use the code to refresh your knowledge, because complacency can create unacceptable risk for you, your colleagues or QAFCO. You may find that new risks have emerged which impact your work or that changes in your job responsibilities have exposed you to risks that you were not aware of previously. If you are unsure or have doubts about an action, always seek advice as explained in the Code.

The Code of Conduct is applicable to all QAFCO employees and everyone working on QAFCO's behalf, from the Chief Executive to the most junior person; so you are strongly encouraged to read, understand and use the Code to make sure you are doing your part to sustain QAFCO's ethical culture. The Company shall never compromise on these principles.

Being a QAFCO employee means doing things right and speaking up when situations fail to meet QAFCO's standards. Through strict compliance with this Code, you are not only contributing to QAFCO's performance and reputation, you are ensuring that QAFCO continues to be a company we can all be proud of.



Abdulrahman M. Al-Suwaidi
CEO



Introduction

Purpose of the Code

Qatar Fertilizer Company P.S.C. (QAFCO, the Company) is a world-scale ammonia and urea production company supporting the national aspirations of the state of Qatar. QAFCO seeks to operate as a prudent and responsible corporate stakeholder committed to continuous improvement with proper regard to health, safety, security and the environment. The Company is committed to maintaining high standards of business ethics and complies with all applicable laws and regulatory requirements.

The Code of Conduct expresses QAFCO's commitment to doing business ethically. It provides requirements and guidance that helps employees carry out their duties professionally and with the utmost integrity, consistent with the Company's values and Business Principles.

The Code of Conduct references relevant Policies and Procedures that provide further details on specific topics. However, no single document can cover every situation. QAFCO relies on all persons in the organization to apply good judgment, to do the right thing and to speak up when there are doubts, questions or concerns. For the purpose of this code of conduct, QAFCO refer to QAFCO and its subsidiaries.

Respecting the Code

Every employee must understand and respect the Code of Conduct. Violations of the provisions of the Code of Conduct may have severe consequences for the individual concerned as well as for QAFCO. Similarly, QAFCO expects all business partners engaging with QAFCO to apply standards consistent with this Code of Conduct.

Employee Responsibilities

It is the responsibility of every employee to:

- Read, understand and work in accordance with the requirements of the Code of Conduct;
- Seek advice in order to clarify meaning or interpretation of the Code of Conduct as and when required;

- Complete the code of conduct training via E-learning.
- Report any witnessed or suspected violation of the Code of Conduct or any applicable law or regulation;
- Cooperate fully with investigations as and when requested;
- Ensure where applicable that any third party they deal with on QAFCO's behalf is aware of their requirement to adhere to business principles which are consistent with QAFCO's Code of Conduct.

Additional Responsibilities for Managers and Supervisors

Managers and supervisors have additional responsibilities that go beyond the basic requirements of other employees, they must:

- Lead by example at all times and uphold the highest level of the principles set forth in the Code of Conduct, promoting them whenever possible;
- Provide support and guidance on integrating the Code of Conduct into the daily work of those who report to them;
- Encourage direct reports to raise questions and concerns, and create a culture of openness and trust;
- Support and protect individuals who, in good faith, report concerns or violations. Any such case must be handled in unbiased manner with the highest degree of integrity, confidentiality and professionalism. Managers and supervisors have the right and responsibility to seek guidance on how to deal with such reports if necessary;
- Never take or allow retaliatory action against anyone who reports concerns in good faith;
- Monitor compliance with the Code of Conduct and ensure that direct reports complete all required training.

QAFCO's Responsibilities

The Company has a responsibility to:

- Set high standards of integrity for its operations, and to communicate these to its employees through the Code of Conduct;
- Provide all employees with the training and tools necessary to address any ethics or compliance issues they may face in their work;
- Investigate any reports of violation and ensure they are treated confidentially and responsibly, and that the review of any report is impartial and diligent;
- Ensure that no-one faces retribution for reports made in good faith;
- Continually strive to improve its corporate governance.



QAFCO Business Principles

QAFCO's key Business Principles are the foundation for creating sustainable value for the Company's stakeholders. The Code of Conduct is built upon these Principles.

Honesty & Integrity

QAFCO does business fairly and ethically. Honesty and integrity are of the highest importance in all business dealings. Through this QAFCO builds strong, trusting and successful relationships with parties both within and outside the Company.

Care

QAFCO recognizes that its success depends on the best use of the talents of its people and their commitment to the Company. QAFCO respects the human rights of its employees and provides them with good and safe working conditions and opportunities to develop their skills.

QAFCO places a special emphasis on the recruitment and development of Qatari nationals.

Sustainability

QAFCO is committed to sustainable operations which do not compromise the ability of future generations to meet their aspirations. The Company seeks to accomplish its business objectives in a manner that causes the least harm whilst creating the greatest value, and is committed to business practices that are economically viable, socially responsible and environmentally friendly.

Responsibility

QAFCO recognizes its responsibilities towards different stakeholders. It is QAFCO's duty to assess the priorities and balance the interests of all stakeholders, including but not limited to shareholders, customers, employees, business partners and the larger community in which QAFCO operates.

Compliance

QAFCO complies with all applicable laws, rules and regulations relating to its business activities wherever the Company does business. QAFCO has put in place comprehensive and robust governance and compliance related policies, standards and procedures, including providing employees with safe and confidential channels to raise concerns and report instances of non-compliance.

Operational Excellence

QAFCO strives for excellence in all areas of endeavor, both technical and non-technical, working with professionalism and due care to maintain high standards of work. The best results are achieved when all persons work as a team, drawing upon the staff's diversity and when the interest of the Company is considered before individual achievement.



Commitment to People

People are QAFCO's most important asset. The Company's success depends on engaged staff committed to QAFCO.

Staff Development

QAFCO promotes the development and best use of the talents of employees with an emphasis on development of Qatari nationals. QAFCO rewards and promotes employees based on merit, performance and competence.

Diversity

QAFCO values the unique contribution that each person brings. QAFCO employees accomplish more when people from diverse backgrounds and with different talents and ideas work together in a positive environment.

Fairness

QAFCO respects the rights and dignity of all employees. Every employee is entitled to fair treatment, courtesy and respect. All decisions related to hiring, promotion, and other HR policies are based on the qualifications and abilities needed for the work to be performed, and in compliance with the requirements for hiring and developing Qatari nationals.

Harassment free work environment

Any form of harassment by or towards QAFCO employees, contractors, suppliers, customers and communities is unacceptable. QAFCO will take all possible measures to prevent and address harassment in the workplace.

Examples of harassment include:

- Creating an intimidating, hostile, or offensive work environment;
- Unwelcome verbal or physical advances and sexually, racially, or otherwise derogatory or discriminatory materials, statements or remarks;

- Unreasonably interfering with an employee's work performance or affecting an employee's employment opportunity.

Privacy of Information

QAFCO respects the privacy of its employees and will only use personal information when needed to operate effectively or comply with the laws and regulations.

QAFCO protects the company's information systems, and in turn the personal information of employees and their dependents by implementing firewalls and information security systems to prevent incursion of viruses and unauthorized access.

Drugs and Alcohol

Alcohol, drugs, or any other substance misuse and/or abuse by an employee that impairs his ability to perform his duties properly and may have serious negative effects on the safety, efficiency and productivity of other employees and QAFCO as a whole.

For the safety and wellbeing of QAFCO employees and the individual concerned, the use, abuse, possession, distribution, and/or sale of illicit drugs or alcohol during Company business hours, on its premises, at official QAFCO events or in a way which violates Qatar law is not tolerated and shall result in disciplinary and legal action. Being unfit for work because of the use of illicit drugs or alcohol is not tolerated.

Human Rights

QAFCO respects human rights of all individuals.

QAFCO shall not engage in any acts of illegal employment or forced labor or the employment of children and minors. QAFCO will not procure goods or services from companies that engage in any illegal employment, such as forced or child labor.

Employee Responsibilities

- Follow and implement the requirements of laws, regulations, decisions and instructions regarding their work without delaying, hindering or impeding their provisions;
- Perform work, assignments and instructions issued to them, in an accurate and honest manner and within the limits of the applicable procedures, instructions, laws, and regulations;
- Cooperate with their supervisors and colleagues in the performance of duties and works assigned to them to ensure smooth workflow and implementation, and deal with them according to the requirements of decency, respect and mutual understanding;
- Observe timekeeping and avoid absence, unless permitted by related rules, regulations and instructions in force;
- All employees and persons working on behalf of QAFCO have an obligation to report what they consider as violations or possible violations of the Code of Conduct, QAFCO's policies and procedures, as well as laws and regulations.

Health, Safety, Security and Environment

QAFCO strives towards an incident free, secure, safe and healthy workplace and protection of the environment.

QAFCO is committed to ensuring:

- That all employees and third parties on QAFCO premises and facilities work in a healthy, safe and secure environment;
- That the Company works in an environmentally sound and sustainable manner, and minimizing harm to the environment;
- Ongoing improvement in awareness of the need for safety, health and environmental protection by employees, contractors, visitors and the local community;
- Compliance with all applicable legislations, regulations and relevant industry standards.

Safety

It is mandatory that any incidents such as accidents, unsafe conditions or near misses shall be reported as soon as practicable so proper action can be taken to resolve the issue and prevent potential injury or consequences.

Security

All QAFCO staff must work as a team to identify security risks. The objective is to identify security risks and mitigate them to protect QAFCO employees, infrastructure, information, environment, and reputation. All QAFCO staff are expected to adhere to QAFCO security measures, and to report any incidents and concerns immediately.

Leaders are particularly accountable for protecting people and assets by continually identifying, understanding and acting to reduce security risks.

Environment

Sustainable development is a fundamental business principle. QAFCO strives to identify and measure the impact its operations and products have on the environment and shall continue to monitor and set targets for minimizing its environmental impact.

As a minimum, QAFCO shall comply with applicable environmental laws and regulations and strives to do better. QAFCO expects that its staff will protect the environment and challenge themselves to create environmentally friendly solutions.



Business Ethics

QAFCO does not obtain a business advantage through bribery, undue influence, improper payments, preferential treatment or any other illegal means. QAFCO has zero tolerance to any form of corruption, fraud or trading in influence. Employees must not obtain any improper personal advantage through their position.

All employees and those acting on QAFCO's behalf are required to adhere to those principles and spirit of the Code of Conduct. QAFCO expects its contractors, suppliers and business partners to be ethically minded, act in a socially responsible manner and apply standards, as a minimum consistent with the Code of Conduct.

Fraud

Employees are prohibited from participating in activities that are characterized by deceit, concealment, or violation of trust and which are perpetrated to obtain money, property or services; to avoid payment or loss of services; or to secure personal or business advantage.

Anti-Bribery and Corruption

Employees are prohibited from offering, promising, giving, authorizing, paying, or soliciting, receiving and accepting any payment, commission, kickback, gift, promise, favour or anything of value, whether directly or indirectly through a third party, which is: (i) to or from any person or entity (whether a government official, a private business person, a commercial organization, or an associate of any of them); or (ii) for the purpose of improperly securing a private or business benefit or advantage, improperly influencing decisions and judgments, or for the improper performance of a function or activity.

QAFCO prohibits facilitation payments. Facilitation payments are typically payments involving sums to an individual within government, or other public authority, or within a private entity to obtain routine services, which are not legally prescribed payments, though not related to obtaining an undue advantage (e.g. customs inspections, visa processing, issue of licenses). This prohibition does not apply to the situations where health, life and liberty are at risk.

Employees shall report any requests for improper payments listed in this section in accordance with the provisions of the Code of Conduct, record all transactions accurately and identify and plan against circumstances where bribery or corruption may occur.

Dealing With Other Parties and Preferential Treatment

QAFCO business partners (suppliers, customers, distributors, agents, consultants, contractors and joint venture partners) are expected to comply with all relevant laws and regulations as well as the principles of the Code of Conduct. QAFCO is responsible to ensure that its business partners are aware of the Code of Conduct and are encouraged to read and understand the standards contained therein.

QAFCO deals fairly and ethically with its business partners.

QAFCO employees shall not provide any preferential treatment, disclose QAFCO information or provide other assistance to any third party in its dealings with QAFCO, leading to such party potentially obtaining improper benefit and undue advantage to the detriment of others. Employees are required to act impartially and adhere to QAFCO policies and procedures in dealing with third parties.

Insider Dealing

QAFCO employees are prohibited from using or providing to others confidential and non-public insider information. This includes information belonging to QAFCO, its affiliates and third party information in QAFCO and its affiliate's possession or information the employee has become privy to as a result of carrying out their duties. In addition to breach of Code of Conduct, failure to comply with the prohibition can lead to the individual becoming criminally liable under the applicable law.

Insider information is Information that is not generally available to public such as:

- Prices and pricing policies, production, output data, operational and business results;
- Upcoming performance announcement or other corporate event;
- The unannounced imminent introduction of an important new product or service;
- Strategies and business plans;
- A possible acquisition or sale of any material assets or entities;
- Entry into or the likely entry into or termination or likely termination of material contracts or other business arrangements which are not publicly known;
- Legal, disputes and claims.

Anti-Money Laundering

QAFCO is committed to comply with applicable anti-money laundering regulations wherever it conducts business. QAFCO will only perform financial transactions with verified recipients and financial institutions for legitimate and substantiated expenses and in accordance with properly executed contractual commitments.

Anti-competitive practices

QAFCO is committed to the principles of free and fair competition in compliance with applicable competition and anti-trust laws.

Employees are prohibited from participating in anti-competitive conduct or collusion of any form.

Collusion is an agreement, understanding or coordinated actions between two or more competitors to limit competition in order to gain an unfair advantage. Collusion is often characterized as an agreement among firms to divide the market, set prices, or limit production. Some examples include:

- Price fixing and pricing strategies – Selling the same products or services at the same price and under similar conditions;
- Volume of sales or production – Producing or selling only a certain (limited) amount of product in the market;
- Dividing territories – Agreeing to stay out of one another's markets to reduce competition in the agreed upon territories or in respect of certain categories of customers;
- Bid rigging – Participating in a form of fraud by which the parties present phony bids at an auction or tender;
- Abuse of market position – Using position in market to obtain an unfair advantage, for example, preventing the fair entry into the market by another business or engaging in low cost pricing for a sustained period with the intention of substantially damaging a competitor;
- Sharing of commercially sensitive information – Inappropriate sharing or failure to protect the confidentiality of QAFCO commercially sensitive information such as prices, and pricing policies, margins and cost data, identity of customers, markets and product destinations, product volumes and usage, and marketing strategy.





Collusion is not limited to direct communication or agreements. Overhearing or listening in on other competitors' discussions can amount to having taken part in illegal collusion. However, gathering and using market information from public sources, such as the media, market research providers, or one's customers ("market intelligence") is not collusion. This is true even when it relates to competitors.

Employees must ensure that they do not engage in collusion, whether expressed or implied. Even informally discussing any of the above matters may be in violation of competition laws.

Gifts and Entertainment

QAFCO does business with organizations and people from many cultures. Building constructive business relationships may sometimes include giving or receiving incidental business gifts and entertainment of nominal value.

Gifts and hospitality comprise anything to which a monetary value can be assigned, such as, but not limited to: cash, vouchers, gift certificates, pre-paid credit or debit cards, air tickets, hotel rooms, jewelry, watches, electronic devices, frequent meals, house or car repairs, jobs for relatives, use of offices or apartments or similar gifts.

Employees must comply with the provisions and act in accordance with the spirit of the Code of Conduct when deciding whether to accept a gift, hospitality, or expense reimbursement from a third party and, if in doubt, shall seek advice from their immediate supervisor.

QAFCO employees and third parties acting on behalf of QAFCO who might provide and receive occasional gifts and entertainment in a corporate capacity to and from third parties are obliged to exercise good business judgment in each case, taking into account pertinent circumstances and acting in accordance with the provisions and in accordance with the spirit of the Code of Conduct. This includes the character of



the gift or entertainment, its purpose, its appearance, the position of the person(s) receiving the gift or entertainment, the business context, reciprocity, applicable laws and social norms.

Giving and receiving gifts, provision of corporate hospitality and donations with the objective of obtaining improper advantage is prohibited.

QAFCO employees shall not accept gifts, entertainment or anything else of value above QAR 200 from a contractor, supplier, customer, landlord, sponsor or any entity with whom the Company has commercial dealings without the written consent of the Company, except where, in the case of a gift of a nominal and promotional nature and within commonly accepted industry practice provided the value is not exceeding QAR 200.

Employees of QAFCO and third parties acting on its behalf shall not make any donations on behalf of QAFCO without prior written authorization from the Chief Executive Officer (CEO) of QAFCO.

All expenditures for gifts and entertainment provided by QAFCO must be accurately recorded in its books and financial records and reported. For details refer to Personnel Procedure Guide (PPG) Chapter – 6 (Appendix B: Conflict of Interest).

When deciding on the appropriateness of giving or receiving a business gift, employees should consider:

- How it compares in value to the usual gift-giving practices in the applicable industry and country;
- Whether any legal, cultural or regulatory restrictions exist;
- The total value of business gifts to or from that person or entity in the current year;

- The impact of the business gift on building positive business relations with the recipient or provider of the business gift; and
- Whether a reasonable person would consider the business gift to be reasonable in similar circumstances;
- Is the person/organization giving the gift in the process of developing a business agreement with QAFCO.

Expense Reimbursement by Third Parties

Employees (or their immediate family members) shall not accept cash payments, reimbursement of, or offers from third parties to pay for business or non-business related hospitality and travel related expenses such as, hotels, resorts, spas, air and/or train fare, transfers, or car hire.

Legitimate business related expenses will be paid by QAFCO. Employees accepting reimbursement from third parties for business related travel expenses and for non-business related travel expenses will be subject to disciplinary action, in accordance with Company's established Disciplinary Procedures. Refer to PPG Chapter – 6 (Employee Relations) for details.

Employee Responsibilities

QAFCO employees are prohibited from:

- Performing or engaging in any transaction or business venture or deliberately exposing themselves to any situation where Conflict of Interest exists or may exist;
- Having a direct or indirect Interest in any entity having current or prospective business relations with QAFCO, irrespective of the activity of that entity, be it a contractor, supplier, customer, landlord, sponsor, or otherwise. This also includes the Families of QAFCO employees where Family is defined as the employee's spouse, children, parents, brothers and sisters. Interest is defined as:
 - Sole or shared ownership of an entity;
 - Any significant involvement, directorship, advisory position, and/or financial interest in a legal entity;
 - Acting as agent, guardian or trustee for others;
- Engage in any business or trade that conflicts with his/her job duties or with the interests of QAFCO, or that would establish a direct or indirect interest for the employee, in any contracts, businesses or tenders relating to QAFCO.



Conflict of Interest

Employees and management must act in the best interests of QAFCO.

QAFCO respects employees' right in privacy in their personal affairs and activities. However, it is possible that personal or immediate family activities result in a potential conflict of interest with their loyalty to QAFCO. This may include any interest that can affect an employee's impartiality with respect to matters relevant to his duties in QAFCO, or that may interfere with his or her objective and effective performance of his work for QAFCO.

Employees are obliged to promptly disclose the facts or circumstances regarding a potential conflict of interest to their immediate supervisors for resolution. In addition and as a minimum, QAFCO requires an annual Conflict of Interest Declaration to be completed by all employees.

Failure to complete the annual Conflict of Interest declaration form or disclose actual or potential conflicts of interest may result in disciplinary action. Refer to PPG Chapter – 6 (Appendix B: Conflict of Interest – Policy & Regulations) for further details.



Assets and Property

QAFCO protects Company assets in all its forms, whether material, electronic, financial or intellectual, against damage, theft and other unauthorized use. The Company relies on its employees to exercise due care in this regard. Intentional disregard for Company assets results in disciplinary action.

The use of QAFCO's materials, equipment, transport, financial assets or facilities by its employees for purposes other than those for which they have been provided is strictly prohibited.

IT and Electronic Communication

QAFCO's information technology and communication systems and devices, including among others, e-mail and the internet, should be restricted to business use. QAFCO policies and procedures provide exception for the limited or incidental personal use of QAFCO devices, e-mail and QAFCO-provided internet.

Information produced, modified, and stored on QAFCO's ICT systems are regarded as QAFCO property. QAFCO reserves the right to access, store, retrieve or manage all such information.

The use of e-mail and QAFCO provided internet to access, distribute inappropriate, offensive and illegal materials is prohibited.

Information and communication systems, including e-mail and connections to the Internet, shall primarily be used for appropriate business purposes; personal use is discouraged, but permitted.

Employee Responsibilities

Employees shall:

- Preserve QAFCO's assets, equipment, tools, books, files and other property by making business decisions that maximize their use in the pursuit of QAFCO business objectives;
- Protect QAFCO's assets and property against unnecessary wear, loss, damage and/or abuse;
- Obtain permission from an authorized or mandated QAFCO representative before removing or borrowing QAFCO's assets for non-business purposes.

Trade secrets and Confidential Information

The protection of information, its use and distribution is vital to safeguard QAFCO's business, employees as well as the image and reputation of QAFCO.

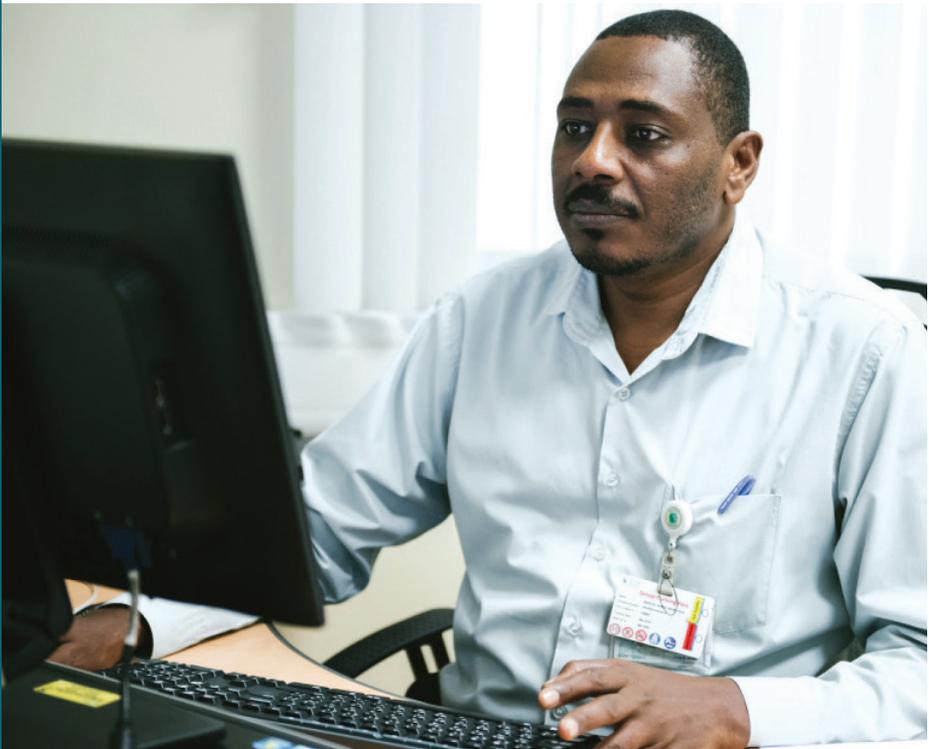
All QAFCO employees are expected to work to prevent unauthorized internal and external persons from gaining access to QAFCO's confidential information. In general, "confidential information" includes information that is not known to the public.

Examples are business plans, marketing and sales programs and data, contracts process, product development plans, information on mergers and acquisitions, and design and engineering specifications. The disclosure of any such information that could harm QAFCO's business or reputation is prohibited.

Therefore, all employees must comply with the requirements to maintain the confidential nature of all such information, except when disclosure is authorized or required by law or internal procedures.

QAFCO is committed to protect both paper and electronic records and systems that store, process and transmit company information assets and intellectual properties. Employees are required to observe the QAFCO procedures for Information classification, to identify and protect assets critical for QAFCO mission and business objectives.

Unauthorized disclosure of QAFCO's trade secrets and confidential information for purposes not directly related to QAFCO's business objectives is prohibited.



Communication

Unauthorized disclosure of information can cause financial harm, damage QAFCO's reputation and expose QAFCO to legal accountability. Information should be guarded closely and used wisely.

Video and audio recording of any QAFCO related business such as meetings, functions, investigations or any other form of communications is strictly prohibited, except where the video and audio recording is under the law and prior written permission.

To prevent unauthorized persons from having access to internal QAFCO information, employees must:

1. Be aware of where they are and who may be able to hear them;
2. Be careful when discussing information in public places, such as restaurants, on planes, in trains, or in elevators;
3. Maintain adequate document control;
4. Understand that forwarding emails can be a breach of confidentiality;
5. Contact your supervisor and or ensure that a suitable confidentiality agreement is in place before sharing confidential information.

Preservation of Confidentiality

- The disclosure of information inside the organization shall be limited to those with authorized access and legitimate reason to require that information;
- The information shall not be used for the personal benefit or profit of the employee or any other except the company;
- The employee shall have access only to the amount and type of information required for the completion of their job responsibilities and no more;
- Employees must limit to a minimum the occasions when they take confidential information out of the office and always motivated by business reasons;
- When perusing or sharing information through electronic means, all precautionary safety measures must be in effect;
- Confidential information must not be left unattended or unlocked;
- Unauthorized replication of information is prohibited;
- Upon separation of employment all confidential information must be returned or deleted from the employee's electronic devices, shall not be used for the personal benefit or profit of the employee or any other except the Company;
- QAFCO has an obligation to protect the confidential information entrusted to it by its business partners. Employees must never share business partners information externally unless authorized or required to do so by law.

Employee Responsibilities

- Communicate in an honest and open manner;
- Provide, upon authorized request, business information relevant to the request;
- Ensure that the disclosed information is complete, accurate, valid to the request;
- Provide requested information in a timely manner to ensure that the requestor can utilize the information to perform their QAFCO assigned duties;
- Employees shall not disclose QAFCO business information gained in the course of their employment unless duly and formally authorized in writing on a case-by-case basis to perform their duties and then only on a "need to know" basis. This obligation shall remain valid after the expiration of the employment;
- Employees shall not use QAFCO business information, in any case, for personal gain or in a way that could be detrimental to the welfare, interest or image of QAFCO;

Commercial Information

Commercial contracting information, such as information contained in tenders, commercial and technical bids is considered confidential and reasonable steps must be taken by Management and employees to protect its confidentiality. Access to such information is restricted to assigned employees only.

Unauthorized disclosure of such information, whether to internal or external parties, is strictly prohibited and any non-compliance will lead to disciplinary action. For more details refer to PPG Chapter – 6 (Employee Relations)

Intellectual Property

QAFCO's intellectual and industrial property, which includes trade secrets, trademarks, patents and copyrighted materials are a key information asset. QAFCO employees must always give proper attention to creating, protecting and exploiting QAFCO intellectual property and to avoiding infringement of the intellectual property rights of others.

QAFCO retains exclusive ownership of any intellectual property conceived or developed utilizing QAFCO resources, when this activity is performed in connection with or relating to work done with QAFCO.

All employees must respect the intellectual property rights of QAFCO and others. This means employees must comply with all applicable laws that govern intellectual property, as well as those of QAFCO's business partners.



Books and Records

Employees shall maintain accurate accounts and records (QAFCO business records) of all business related dealings, conducted or made for and on behalf of the corporation. QAFCO business records shall accurately reflect the company's business transactions and the disposition of its assets. Employees shall not make any false or misleading entries in the accounts or records of the company.

QAFCO business records include, but are not limited to: contracts; purchase orders; receipts; records of all communications with bidders, contractors, and vendors; and minutes of meetings; records of discussions with bidders, contractors, vendors; internal committee meeting minutes; presentations; business related documents; and email with, or without, attachments.

Employees shall:

- Record and maintain complete and accurate business information;
- Disclose and provide such information in a timely manner when formally requested by an authorized employee or to any authorized and mandated QAFCO representative; and
- Make such information available to internal and external audit, and relevant regulatory bodies as directed by the appropriately authorized management representative.

Press and Media Policies, and Representation on Social Media

Employees must direct all media enquiries to the Public Relations and Communications Department (PR) and shall not issue any communications to the media, such as press releases, information uploads to social media platforms, without first obtaining permission from the Public Relations Department.

Information or data relevant to QAFCO's business shall only be released with the prior permission of the Public Relations & Communications Manager. Unauthorized representation of QAFCO on social media, and release of QAFCO related information on public domains such as Twitter, Facebook, LinkedIn and other social media is prohibited.

QAFCO's information assets are one of the Company's vital resources which require protection. These include both paper and electronic records and also the systems that store, process or transmit company information.



Laws and Regulations

Laws and Regulations

QAFCO operates in compliance with all applicable laws and regulations relating to its business activities. All applicable licenses, permits and government authorizations should be obtained and maintained if and when required under the applicable law. Employees shall perform their job duties in compliance with relevant laws and regulations. QAFCO also expects its business partners to comply with all applicable legal requirements when providing products and services to or working with QAFCO.

Customs and Traditions

Employees must pay due respect to the culture and traditions of the State of Qatar, comply with rules and regulations issued by its authorities and observe general customs and traditions.

Employees shall maintain the dignity of their job in accordance with the general customs and act with respect inside and outside the workplace.

Political activity

Employees shall not engage in any kind of political activities, or be associated with any organization, body or group involved in a prohibited political, ideological or religious activity in the State of Qatar, or practicing an activity against the State of Qatar.

Employees shall not sign petitions, letters or statements that would prejudice the reputation and prestige of the State, or induce other employees to sign them.

The distribution of any flyers or publications containing what would disturb the public security, prejudice the reputation and prestige of the State, or affect its relations with other countries is prohibited.

Trade Compliance

QAFCO operates in compliance with all applicable trade control laws and regulations wherever the Company conducts business, including trade restrictions and economic sanctions, customs regulations, import and export laws.

Missionary Activities

QAFCO employees shall not involve in any missionary activities such as convincing others of a certain belief, or providing aids to any of the communities within Qatar State for the sake of converting someone from one religion to another.

How to Seek Guidance

It is every employee's right and responsibility to obtain guidance regarding any business decision they are uncertain about.

"I didn't know" is not considered a valid defense for making a decision that is not in accordance with the Code of Conduct.

An employee's first point of contact for guidance should always be their line manager. Alternatively or additionally, any employee can contact the following support functions

- Legal Department: For issues related to Ethics and Compliance;
- Human Resources Department: For people related issues;
- Legal Department: For legal issues such as sanctions, antitrust, data privacy, and contractual wording in business partner agreements;
- HSEQ Department: For issues related to health, environment, safety, quality, or security.



How to Report an Issue

Employees have a responsibility to report any witnessed or suspected incidents of misconduct, unethical or other behavior incompatible with the provisions and spirit of the Code of Conduct. QAFCO provides for employees to anonymously report suspected or witnessed misconduct without fear of reprimand or disciplinary action.

QAFCO does not tolerate action taken, or threats of action, against employees for asking questions, voicing concerns, or making complaints or suggestions in relation to the Code of Conduct when made in good faith.

The first point of contact for reporting a violation should be the line manager. Reporting should be done as soon as possible. Alternatively or additionally, any employee can contact the following support functions:

- Legal Department: For issues related to Ethics and Compliance;
- Human Resources Department: For people related issues;
- Legal Department: For legal issues such as sanctions, antitrust, data privacy, and contractual wording in business partner agreements;
- HSEQ Department: For issues related to health, environment, safety, quality, or security.

If an employee believes their report is not being dealt with adequately, QAFCO encourages them to contact the Internal Audit Department.

It shall be noted that employees can also report possible violations, meaning they do not need to have all of the facts or be completely certain of wrongdoings. If an employee has reasonable concern that misconduct has taken place, this is sufficient to report an issue. The only condition for reporting an issue is that it is done in good faith, and with complete honesty about what is known or suspected.

If an employee has concerns about misconduct, but thinks the Company is already aware of the situation, they are encouraged to clarify this before deciding not to report the matter.

Depending on the nature of the issue, an employee may contact the Internal Audit Department directly. Examples of when to do this are:

- If an employee suspects their line manager of wrongdoing;
- If a line manager is not following up adequately on a matter which has been reported to them;
- If the misconduct involves senior/executive management;
- If an employee has concerns about retaliation;
- If the way another support function has handled the report is the problem.

More details on reporting concerns can be found in the Guidelines for Whistle Blowing Complaints and Handling Sla-001, Email : whistleblowing@qafco.com.qa

Prohibition of Retribution or Retaliation

QAFCO protects those who report an actual or reasonably suspected violation in good faith, any retaliation against such reporter is unacceptable and shall not be tolerated. Similarly, QAFCO shall protect any employee who refuses to follow an instruction that violates the Code of Conduct, QAFCO's policies, standards and procedures or laws and regulations.

Retribution or retaliation is a very serious matter, and preventing it is a top priority for QAFCO. The Company has established a safe environment for all employees to share their concerns, it is QAFCO's objective that all employees shall feel secure while doing so. The Management tracks situations where someone has made a report to ensure there are no cases of either formal or informal retribution or retaliation. If retribution or retaliation is a concern for an employee, report directly through the On-line Whistle Blowing Process.

Reporting in "good faith" means that the provision all of the information one has and believes to be true. Employees can report something they suspect and still be in good faith, even if the suspicion turns out to be unjustified. If anyone deliberately makes a false report (i.e. claiming something they know to be untrue), that person shall be subject to disciplinary action.



References

- Personnel Procedure Guide (PPG) Chapter – 6: Employee Relations
- Personnel Procedure Guide (PPG) Chapter – 6 (Appendix – A): Breach of Discipline Guide
- Personnel Procedure Guide (PPG) Chapter – 6 (Appendix – B): Conflict of Interest
- Document ID - Sla-001 : Guidelines for Whistle Blowing Complaints and Handling.

