

Commercial Bank – Anti-Bribery and Corruption Policy Statement

At the Commercial Bank (CB or the Bank hereafter), the way of doing business is critically important for the Bank to achieve its strategic objectives. Through Anti-Bribery and Corruption Policies (the Policy or this Policy hereafter) and the related SOPs, CB and its employees (including Board of Directors) acknowledge that bribery and corrupt practices are unethical and prohibited. Therefore, CB takes a zero-tolerance approach to any form of bribery and corrupt practices and consequently implements effective policies, procedures, systems and controls to counter the risk of bribery and corruption.

Purpose:

The purpose of this Policy Statement is to provide a summary of key rules, objectives and principles which employees of the Bank and its subsidiaries shall adhere to in order to maintain high ethical standards and to prevent and combat bribery and corruption. It also seeks to raise awareness among employees of the Bank and related third parties (i.e. vendors, service providers, contractors or customers) about consequences of bribery and corruption practices, so that they could uphold CB's zero tolerance approach to bribery and corruption and avoid actions or activities that can negatively impact the Bank's image and reputation.

Scope:

This Policy applies to all employees and contractors working in all departments, branches and subsidiaries of the Bank, including:

- CB directors
- CB permanent employees (both full- and part-time)
- CB temporary employees
- CB contractors
- CB service providers
- Joint venture partners, and
- Third-parties acting on behalf of CB

Responsibilities:

- **The Board of Directors and its Audit & Compliance Committee** is responsible for approving and overseeing the implementation of CB Anti-Bribery and Corruption Policies. The Board may further delegate its responsibilities to a sub-committee in accordance with the Bank's Delegation of Authority Policies.
- **The Senior Management of CB** is responsible for implementing CB Anti-Bribery and Corruption Policies. Management at all levels are responsible for ensuring that employees are made aware of and understand contents of the CB Anti-Bribery and Corruption

Policies and are given adequate and regular training. Senior Management shall communicate the zero tolerance approach to bribery and corrupt practices to all stakeholders i.e. suppliers, contractors, business partners at the onset of business relationship and as appropriate thereafter. The Senior Management may further delegate its role and responsibilities in accordance with the Bank's Delegation of Authority Policies.

- **Financial Crimes Control (FCC)** is responsible to conduct investigations on potential breaches of CB Anti-Bribery and Corruption Policies as per the established investigation and enforcement protocols.
- **Human Capital Department (HC):** The Employee Handbook and Code of Conduct Policies have been developed by Human Capital, which are read in conjunction with CB Anti-Bribery and Corruption Policies. All existing employees receive regular, ongoing updates on how to implement and adhere to CB Anti-Bribery and Corruption Policies.
- **Employees:** All employees shall abide by this Policy and do their best to ensure that the Bank is protected against any regulatory, financial or reputational damage. All employees shall discharge their duties and responsibilities in compliance with this Policy and laws of the jurisdiction they operate in.

Key Principles:

Pursuant to this Policy Statement, following behaviors are prohibited for CB employees.

1. **Active Bribery:** Employees shall never offer, promise, or pay bribes, including "facilitation payments", other improper payments that would unduly advantage a person.
2. **Passive bribery:** Employees shall refrain from requesting, soliciting, agreeing to receive or receiving a bribe from any person.
3. **Kickbacks:** Employees shall never collude with any person for a negotiated bribe in which a commission or other remuneration is paid to the bribe-taker in exchange for an advantage or other services rendered. Kickbacks typically encourage other party to cooperate in some illicit or illegal scheme.
4. **Hospitality/Event Acceptance:** Corporate hospitality and events offered to customers, suppliers, and business partners form part of the genuine commercial activities of CB. However, hospitality can be used as a mean of bribery and corrupt practices when it is excessive and/or is designed to improperly influence the recipient(s). Any hospitality offered or provided shall not be intended to influence the recipient or any other person to act in an improper way or to influence a public official in the performance of his/her official duties.
5. **Gift Acceptance:** Employees may accept modest gifts or entertainment from clients or suppliers (up to a permissible limit of QAR 350) provided that the gift or entertainment is declared to and approved by the Line Management.
6. **Political and Charitable Acceptance:** A political or charitable contribution is prohibited if it:
 - provides a direct/ indirect benefit (financial or otherwise) to a person who has requested or suggested it;

- is provided to elected officials or individual members of political parties or organisations; or
 - is effectively a disguised bribe.
7. **Facilitation Payments:** Employee shall not make facilitation payments. Facilitation payments are payments, large or small, made to government officials to secure or expedite routine or necessary official action, either more promptly or at all (e.g. custom clearance or issuance of visas).
 8. **Business Travel:** Business travel expenditures can be misused to disguise corrupt behavior, such as in case where an employee promises, offers, or provides business travel with the intention of receiving an improper benefits in return. Thus, employees shall adhere to CB Employee Handbook with regards to business travels.
 9. **Marketing Sponsorships:** All marketing sponsorships shall be reviewed and approved in accordance with the Delegation of Authority Matrix. CB shall pay special consideration to sponsorships which provide the Bank opportunities to invite third parties to exclusive entertainment events as such activities may create the risk of appearance that they will be used to improperly influence the award/retention of business or other advantage.

Training:

All CB employees have a primary responsibility to comply with this Policy. To ensure awareness of related requirements, all CB employees are required to complete the mandatory training course on Anti-Bribery and Corruption at the start of their employment and on a regular basis throughout the course of their employment.

Consequences for Non-Compliance:

The Bank under no circumstances shall tolerate an employee (nor its Director) engaging in any act of bribery or corruption. The Bank will vigorously enforce compliance with this Policy and any violations of the Policy may result in disciplinary action including termination of employment and reporting to law enforcement for legal proceedings.

Reporting:

Employees at all level of the Bank are responsible to report all incidents of bribery and/or corruption to Financial Crimes Control unit who will assess the incident and, if necessary, conduct an investigation. Employees reporting incidents of bribery and/or corruption should maintain strict confidentiality of the allegation. Reporting unlawful conduct shall not be met with any adverse consequences from the Bank. The intimidation or retaliation against anyone who makes a good faith report about an actual or potential violation of any CB policy or procedure, or of any law or regulation is strictly prohibited.