

The Commercial Bank (P.S.Q.C) Commercial Bank Subsidiaries Code of Conduct



August 2024

Version 5.0

| Revision History | | | | |
|------------------|---------------|----------------------------------------------------------------------------------------------------------------------------------------|----------------|--------------------|
| Revision Number | Revision Date | Amendment Description | Date Effective | Next Revision Date |
| 2 | April 2022 | Reference to respecting human rights added Details of types of discrimination prohibited provided Reference of UN Global Compact | | |
| 3 | August 2024 | Reference to regulatory requirements added to align to QCB requirements and reference to updated Whistleblowing policy | | |

| Review | | |
|---------------------------------------------------------------------------|------------|-------------------------------------------------|
| Authorised Reviewer | Date | Signature(s) |
| Head of Talent and Resourcing on behalf of Chief Human Capital Officer | 08/28/2024 | On behalf of CHCO: Fadia Fakih |
| Group Chief Executive Officer | 08/28/2024 | Joseph Abraham |
| Board Remuneration, Nomination and Governance Committee | 09/09/2024 | M. Mandani |
| Board of Directors | 12/09/2024 | M. Mandani abdulla al thani Hussain Alfardan |

Jabor Al Thani Ijalothman Tariq Al Malki Mohammed Almosallam

Code of Conduct

Your reputation and Commercial Bank's reputation — they are one

At the heart of every great company is a set of clear and consistent values. At Commercial Bank, our Code of Conduct underscores every decision we take, guides us in our behaviour and reflects our commitment to our customers, communities and each other.

At the heart of our Code of Conduct is the imperative to do the right thing by our customers and uphold the reputation of Commercial Bank. We work to create a culture that values and supports the highest standards of ethics and conduct.

The Code of Conduct is an important part of our DNA and a big part of what differentiates us. The Code sets the standards for the way we work. Every employee personally commits to this Code.

1. We act with honesty and integrity
2. We comply with laws and our policies
3. We do the right thing by our customers
4. We respect confidentiality and we do not misuse information

5. We value and maintain our professionalism
6. We respect human rights and work as a team
7. We manage conflicts of interest responsibly.

The Code has the full support of the Board of Directors and the Executive Team and is administered by our Human Capital Unit. Amendments to the Code must be approved by our Board of Directors.

Everyone has a role to play in ensuring the Group's reputation is strengthened and not harmed by inappropriate conduct. Every employee in the organisation commits to the Code by signing a personal undertaking.

We take compliance with the Code very seriously.

Any breach of the Code must be reported immediately to management or to Human Capital.

Our Whistleblowing Policy (06-02-POL-009), published under Compliance & FCC, outlines our reporting channels, as well as the process for raising concerns anonymously.

A breach of the Code of Conduct will lead to disciplinary action up to and including termination of employment within the restrictions and requirements of Qatar Labour Law.

Very serious penalties will apply if an employee is found to have:

- Concealed, willfully failed to report, suppressed or misstated a violation of the Code by a colleague or superiors, or,
- Known about a violation of the Code by a member of his or her team and failed to promptly correct the violation, or,
- Retaliated or encouraged others to retaliate against an employee for reporting an actual or suspected violation of the Code.

1. We act with honesty and integrity

Trust is the foundation of our profession. We do the right thing because it is the right thing to do.

Honesty and integrity go hand-in-hand. They guide us in making decisions, so that we make the correct choices between right and wrong. There is no room for compromise: if we do not act with honesty and integrity 100 per cent of the time, we are undeserving of the trust of our customers, colleagues, community and shareholders.

2. We comply with laws and our policies

We comply with our regulatory requirements including but not limited to QCB, QFMA and QFC (whichever is applicable), voluntary codes of practice to which we subscribe and Commercial Bank policies, including this Code of Conduct. If we fail to comply with laws and regulations, both Commercial Bank and the individual employee may face sanctions or other serious consequences.

3. We do the right thing by our customers

Doing the right thing by our customers is integral to our culture. We treat our customers fairly. We do not favour the interests of one customer over another We aim to:

- Provide customers with the information they need to make informed decisions.
- Always put our customers' needs first when we give advice.
- Ensure our products and services are suitable for our customers.
- Listen to, and act on, customers' complaints.

4. We respect confidentiality and do not misuse information

We respect the trust placed in us.

- We do not use or disclose confidential customer information, except if our customer has authorised us to do so and the use or disclosure is permitted by law.
- Similarly, if we come across confidential information concerning Commercial Bank, such as strategic information, we do not disclose or misuse that information.
- We do not use information obtained at work to gain a personal benefit, or benefits for other people. These obligations continue after we leave Commercial Bank.

5. We value and maintain our professionalism

We take responsibility for our professional conduct. The way we present ourselves both at work and outside work directly impacts how others perceive us and therefore Commercial Bank. We should, at all times, act in a professional and ethical manner, striving for excellence in everything we do.

Examples of the way we value and maintain our professionalism are:

- Acting with integrity and doing the right thing when delivering on our commitments.
- Being accountable for our decisions and actions.
- Seeking to continually improve our skills and knowledge so that we achieve excellence in our roles.
- Communicating professionally with our stakeholders, including via social media.
- Providing advice to customers only when we are expressly authorised and qualified to provide the advice.
- Knowing our customers and our suppliers, and ensuring we work with people who share our commitment to honesty, integrity and upholding the law.
- Working pro-actively to combat money-laundering and terrorist financing, including reporting any suspicious activities to our Compliance Department.

- Using Commercial Bank property, including information technology, for proper purposes.
- Ensuring we abide by our contract of employment.

We do not gamble for money (including sports, cards, and raffles).

As private individuals, we do not personally borrow from customers, or lend our own money to customers.

We do not communicate publicly on behalf of Commercial Bank unless we receive written permission in advance.

We refer all media enquiries to our Marketing Department.

6. We respect human rights and work as a team

- We work together as a team and we treat each other with respect and kindness, promoting an environment that enables everyone to reach their full potential.
- We recognise the power and importance of workplace diversity and we value and respect each other's differences.
- We respect human rights and we respect Qatari business, cultural and social norms and observe these in the workplace.
- We do not tolerate bullying, harassment, any type of discrimination based on race, religion, gender, age or language or any other offensive conduct.
- Our word is our bond – we say what we mean – we don't have one conversation in a meeting and a different conversation outside that meeting.
- We share the work evenly and we support each other to deliver excellent service to our customers.
- We are signatory to the United Nations Global Compact and support the ten principles on human rights, labour, environment and anti-corruption.

7. We manage conflicts of interest responsibly

A conflict of interest arises in situations where a person's private arrangements, personal circumstances, personal or family relationships, benefits or interests (financial or otherwise), could (or could be perceived to) impinge on a person's ability to act impartially.

We do not participate in activities that involve a conflict of interest between our personal interests and our duties and obligations to Commercial Bank, or, which a reasonable person would perceive as a conflict of interest.

Some examples of how we manage conflicts of interest include:

- Immediately reporting dishonest behaviour by a colleague or customer.
- Disclosing any material interest we have in a customer or supplier's business to our manager.
- Ensuring we do not put ourselves in a position of conflict with the interests of a customer, or favour the interests of one customer over another.
- Seeking the consent of senior management before accepting a directorship on the board of a non-Commercial Bank company.
- Keeping records of our dealings with customers and suppliers that are accurate and transparent.

We do not:

- Process our own transactions or those of our friends, relatives or business associates.
- Solicit, accept or offer money, gifts, favours, entertainment or bribes which might influence, or be seen to influence, our business judgement.
- Trade in the shares of Commercial Bank or any other entity if we have obtained material information that is not generally available to the market place. We do not pass such information on to any other person.