

Commercial Bank Anti-Bribery and Corruption (AB&C) Policies

06-02-POL-004
Dec, 2022

Version 4.0



1 Contents

I. Policies Manual Summary Profile and Approval.....	5
1. Introduction.....	6
1.1. Objective of the Policy.....	6
1.2. Scope of this Policy.....	6
1.3. Non-Compliance.....	7
1.4. Confidentiality and distribution.....	7
1.5. Maintenance and revision of the Policy.....	8
1.6. Reference to Related documents.....	9
2. Key definitions.....	10
3. Governance.....	12
3.1. Roles and responsibilities.....	12
3.1.1. Board Risk & Compliance Committee.....	12
3.1.2. Senior Management.....	12
3.1.3. Anti-Fraud And AB & C.....	12
3.1.4. Human Capital Department.....	12
3.1.5. Disciplinary Review Committee (DRC).....	13
3.1.6. Employees.....	13
4. Policy Statement.....	14
4.1. The Policy statement and principles.....	14
4.2. Bank's commitment to ethical business and behavior.....	14
4.2.1. Compliance with laws and regulations.....	14

Anti-bribery & Corruption Policies (06-02-POL-004)

4.2.2.	Ethical decision making.....	15
4.2.3.	Ethical best practices.....	16
4.2.4.	Confidential information dealing.....	16
4.2.5.	Insider trading and information barriers.....	17
4.2.6.	Avoiding conflicts.....	17
4.3.	Diversity and inclusion.....	17
4.4.	Speak up.....	18
5.	Prohibited Behavior.....	19
5.1.	Active bribery.....	19
5.2.	Passive bribery.....	19
5.3.	Kickback.....	19
5.4.	Hospitality/Events acceptance.....	19
5.5.	Gifts.....	20
5.5.1.	Gift acceptance.....	20
5.5.2.	Giving gifts:.....	20
5.5.3.	Prohibitions:.....	20
5.6.	Political & charitable acceptance.....	21
5.7.	Facilitation payments.....	21
5.8.	Business travel.....	22
5.9.	Conflict of Interest.....	22
5.10.	Personal gain.....	22
5.11.	Interaction with suppliers.....	23

Anti-bribery & Corruption Policies (06-02-POL-004)

5.12. Interaction with customers.....	23
5.13. Discouraging customers and enticing colleagues.....	23
5.14. Respect for competition.....	24
5.15. Employment and Work Experience.....	24
5.16. Marketing Sponsorships.....	24
6. Investigation Procedures.....	25
6.1. Investigations procedures to address complaints.....	25
7. Anti-Bribery and Corruption Training.....	27
7.1. Requirements.....	27
7.2. Frequency.....	27
7.3. Frequency of training updates.....	27
8. Principal Contact.....	28
8.1. List the relevant contacts for matters related to AB&C.....	28
II. Abbreviations.....	28
III. Appendices.....	29
Appendix A: Policies Manual Revision Proposal Form.....	29
Appendix B: Policies Manual Distribution and Acknowledgement Form.....	29
Appendix C: Red flag scenarios.....	30
Appendix D: Gift Declaration Form.....	33

I. Policies Manual Summary Profile and Approval

Strategic Business Unit (SBU) Compliance and Financial Crimes Control

Policies Name Anti-Bribery and Corruption (AB&C) Policies Manual

Policies Reference 06-02-POL-004 Version 4





Revision History				
Revision Number	Issue Date	Amendment Description	Date Effective	Next Revision Date
4.0	Nov, 2021	Update business unit name from FCC to Anti-Fraud and AB&C Change BACC to BRCC Updates to gifts policy Change frequency of AB&C training from annual to once every two years. Deletion of Risk Assessment.	Dec, 2022	Dec, 2024

Note: As no significant changes are presented in this update, document will be signed by Senior AGM - Chief Compliance Officer and Head of Anti-Fraud Control & Investigations

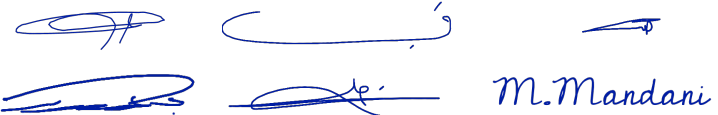
Approval		
Authorised Approver	Date	Signature(s)
Head of Anti-Fraud Control & Investigations	22/01/2023	<i>S J De Zoysa</i>
Head of Financial Crimes and Regulatory Compliance	22/01/2023	<i>Dmitry Artemiev</i>

Chief Compliance Officer	22/01/2023	Abdulla Al Fadli
--------------------------	------------	------------------

Strategic Business Unit (SBU) Compliance and Financial Crimes Control
Policies Name Anti-Bribery and Corruption (AB&C) Policies Manual
Policies Reference 06-02-POL-004 Version 3

Approval		
Authorised Approver	Date	Signature(s)
Compliance Risk Committee	05-Feb-2023	Approved by circulation
Board Risk and Compliance Committee	22/02/2023	M. Mandani  
Board of Directors	12/03/2023	Abdulla Al Thani  Hussain Alfardan 

The Chief Compliance Officer will formally review the Policies Manual for its completeness, adequacy, and alignment to business imperatives (current and future) annually or on a more frequent basis if deemed necessary. Kindly refer to “Section 4 - Maintenance of the Policies Manual” for additional details.



M. Mandani

1. Introduction

1.1. Objective of the Policy

The Anti Bribery & Corruption Policy (hereinafter 'Policy') sets out the general rules, objectives and principles which employees of Commercial Bank (hereinafter 'CB' or 'Bank'), including Commercial Bank Innovation Services (hereinafter 'CBIS'), shall adhere to in order to maintain high ethical standards to protect the Bank's reputation against any allegation of Bribery and Corruption.

CB complies with legal obligations, regulatory requirements and professional codes of practice to which CB subscribes.

The objective of this Policy is to set out the Bank's Policy for combatting bribery and corruption, in line with all applicable Anti Bribery & Corruption laws in Qatar, Qatar Central Bank (hereinafter 'QCB') Corporate Governance Principals for Banks, and leading industry practices. In addition, the Policy addresses how to detect violations and how to mitigate risks.

CB applies a zero tolerance policy to any form of bribery and corruption. Through this Policy, CB and its employees (including its Board of Directors) acknowledge that bribery and corruption practices are unethical and prohibited.

Employees are bound by this Policy and are required to observe it all times. The Bank, under no circumstances shall tolerate any employee (nor its Board of Directors) engaging in any act of bribery or corruption. CB will vigorously enforce compliance with this Policy and violations may result in disciplinary action including termination of employment and reporting to law enforcement for legal proceedings.

1.2. Scope of this Policy

The Policy shall apply to employees and contractors (hereinafter 'employee') in all Departments, Units, Branches and Subsidiaries. This shall include:

- Directors (Executive and Non – Executive) ;
- Permanent full time employees;

Anti-bribery & Corruption Policies (06-02-POL-004)

- Permanent part time employees;
- Temporary employees;
- Contractors;
- Service providers; and
- Joint Venture partners.

1.3. Non-Compliance

This policy shall be administered by the Anti-Fraud and AB&C Department. All findings shall be subject to regular audits by the Bank's Internal Audit Department to provide assurance that they are effective in countering bribery and corruption.

Employees at all levels are responsible to report all incidents of bribery and/or corruption to Anti-Fraud and AB&C who will assess the incident prior to conducting an investigation. Employees reporting incidents of bribery and corruption to Anti-Fraud and AB&C should maintain strict confidentiality of the allegation and are prohibited from disclosing facts to any others.

Employees who fail to comply with this Policy shall be subject to disciplinary action including termination of employment and reporting to law enforcement for legal proceedings.

1.4. Confidentiality and distribution

The contents of this Policy shall be treated as confidential and is not to be disclosed or distributed to any unauthorized natural or legal person/s.

This Policy must not be distributed, copied or revealed to any unauthorized third party (or parties). This Policy may be distributed only in specific/exceptional cases where there is a proper justification for the document content disclosure. Such distribution shall be based on express written permission of the Chief Compliance Officer of the Bank. Any such third party shall sign a confidentiality agreement with the Bank prior to receiving a copy (electronic or other) of the Policy.

1.5. Maintenance and revision of the Policy

Revisions of this Policy are the principal way of implementing and communicating changes that may arise in response to changing regulatory requirements and leading international practices. The objective of formalising the Policy revision is to ensure that all amendments, additions or deletions to the Policy are properly documented and authorised / approved prior to implementation. Moreover, the Policy needs to be reviewed due to internal factors that include but are not restricted to the introduction / change / discontinuation of new services / operations or other organisational re-alignments.

This Policy shall be reviewed at least annually for updates by Compliance & Anti-Fraud And AB&C and requests for revision of this Policy shall be made to the CCO through a Policy Revision Proposal (Refer to Appendix A).

All subsequent amendments, additions or deletions to this Policy shall be properly documented and authorized/approved prior to implementation (Refer to Board Delegation of Authority (01-01-DOA-001) for DOA revision approval process) through the below:

- Chief Compliance Officer;
- Compliance Risk Committee (CRC); and
- Board Risk & Compliance Committee (BRCC).

Upon updating the Policy, the following activities and revisions shall take place:

- The date shall be updated through the use of the Month and Year on the cover page, revision history page and header of the document.
- The version number shall be updated on the cover page, revision history page and the header of the document. The version number shall increase by one with every update.
- The revision details shall be highlighted in the "Amendments Description" table found on the revision history page.
- The file name shall be updated in accordance to the latest date and version number.
- The Policy shall be distributed to the relevant stakeholders and their acknowledgment is obtained using the form provided in Appendix B

Anti-bribery & Corruption Policies (06-02-POL-004)

The non-editable soft copy of the Policy shall be maintained for internal distribution., The Original Policy approved/signed by the BRCC and editable version shall be kept in safe custody by Anti-Fraud and AB&CSBU.

1.6. Reference to Related documents

This Manual should be in line with CB's:

- Fraud Investigation and Enforcement Protocol (14-04-PROTO-001)
- Anti-Fraud Policies (06-02-POL-005)
- AML CFT and Sanction policy (06-02-POL-002)
- Board Delegation of Authority (01-01-DOA-001)
- Procurement Policy (11-03-POL-001)
- Articles of Association
- Compliance SBU Organizational Structure
- Compliance SBU Delegation of Authority Manual (06-02-DOA-001)
- Board Policies Manual (01-01-POL-001)
- Human Capital Policies Manual (12-01-POL-001)
- Operational Risk Management Policies Manual (14-02-POL-011)
- Information Security Management Policies Manual 07-03-POL-001
- Employee Handbook (12-12-PRO-001)

2. Key definitions

Term	Definition
Bribery	The practice of offering something, usually money, to gain an undue or illicit advantage. A bribe does not have to be in the form of cash. It can be an offering, promising, giving, receiving, or soliciting anything of value (not only cash, but gifts, hospitality, entertainment, travel, jobs, internships, loans, stock – something of “value” to the receiver, even if it costs nothing to the giver), directly or indirectly, with the intent to influence how someone carries out (including omitting carrying out) a public, official, commercial, or legal duty.
Corruption	An abuse of (or inducement to abuse) a position of trust or power (personal, political, or commercial) in order to gain an undue personal, political, or commercial advantage.
Ethics	Moral principles that govern a person's behavior or the conducting of an activity. Employees of the Bank should conduct themselves with integrity and dignity and act at all times in an ethical manner in their dealings with the public, customers, employers and fellow employees
Confidential information	Information that is acquired, received, learned, created, developed as a result of access due to employment at the Bank that is not made readily available to the public. The information can be written, oral, telephonic, or electronic and includes data from technology applications, business strategies, and customer preferences and personnel information. Confidential information may pertain to CB itself, or to the customers, suppliers, or companies with whom the Bank does business with.
Gift	Gifts refer to any invitation, gift, present, meal, entertainment or any other courtesies offered or given to, or received from, suppliers/vendors and/or any natural or legal person that may hold a business, institutional or similar

Anti-bribery & Corruption Policies (06-02-POL-004)

	relationship with the Bank
Facilitation Payment	Small payments intended to gain access to, speed up receipt of, or secure the performance of, a “routine” (non-discretionary, non-decision-making) governmental action.
Insider trading	Illegal practice of trading to one’s own advantage through having access to confidential information.
Kickback	A form of negotiated bribery in which a commission or other remuneration is paid to the bribe-taker in exchange for an advantage or other services rendered. Generally speaking, the remuneration (money, goods, or services handed over) is negotiated ahead of time. Kickback varies from other kinds of bribes in that there is implied collusion between the “giver” and the “taker” (or agents of the two parties), rather than one party receiving (or soliciting) the bribe from the other. The purpose of the kickback is usually to encourage the other party to cooperate in some illicit or illegal scheme.

3. Governance

3.1. Roles and responsibilities

3.1.1. Board Risk & Compliance Committee (BRCC)

The BRCC shall be responsible for reviewing and approving this Policy. They shall provide oversight on the Bank's legal and ethical obligations and ensure that it has been specifically adopted in this Policy. Overall responsibility for Anti-Bribery and Corruption rests with the Boards of Directors. However, all CB employees shall be responsible for the success of this Policy and to further CB's commitment to the prohibition of bribery and corruption.

3.1.2. Senior Management

Senior Management shall be responsible for implementing this Policy. Management at all levels are responsible for ensuring that employees are made aware of and understand this Policy and are given adequate and regular training.

Senior Management shall communicate the zero tolerance approach to bribery and corruption to all stakeholders i.e. suppliers, contractors, business partners at the onset of business relationship and as appropriate thereafter.

Senior Management shall also ensure that all breaches are immediately communicated to Anti-Fraud And AB & C for further action.

3.1.3. Anti-Fraud and AB&C

Anti-Fraud and AB&C shall be responsible to conduct investigations on potential breaches of this Policy as per the established investigation and enforcement protocols.

3.1.4. Human Capital Department

The Employee Handbook and Code of Conduct Policy have been developed by Human Capital, which should be read in conjunction with this Policy. Training on this policy shall also form part of the induction process conducted by Human Capital for

Anti-bribery & Corruption Policies (06-02-POL-004)

all new employees. All existing employees shall receive regular, ongoing updates on how to implement and adhere to this Policy.

3.1.5. Disciplinary Review Committee (DRC)

An investigation report with findings and recommendations will be provided to CCO who will escalate the staff related cases to the Disciplinary Review Committee, for final decision as applicable.

If an investigation results in a confession by the accused staff accepting wrongdoing, appropriate disciplinary action will be decided by the DRC in line with the disciplinary matrix. If in any event, DRC believes that the case is sensitive and impacts CB reputation they may refer the issue directly to the BRCC.

Incidents involving customer or third parties, may be referred to the exit committee for decision making.

3.1.6. Employees

All employees shall abide by this Policy and do their best to ensure that the Bank is protected against any regulatory, financial or regulatory damage. All employees shall discharge their duties and responsibilities in compliance with this Policy and laws of the jurisdiction they operate in.

In case of any doubt with respect to the permissibility of certain actions or matters related to the provisions of this Policy, all employees shall consult their line managers / Human Capital / and/or Compliance & Anti-Fraud and AB&C for clarification.

4. Policy Statement

4.1. The Policy statement and principles

CB is committed to ethical business. The Bank's Policy is never to offer, pay, request, solicit or receive bribes, or to facilitate, assist in or abet any offer or payment of bribes and to refuse any request to pay them.

CB shall not tolerate any form of bribery or corruption and CB:

- is committed to ensuring that bribery and corruption does not occur; and
 - shall investigate and deal with all the reported cases of bribery and corruption in accordance with this Policy.
- as per this Policy, all employees shall:
- Carry out their responsibilities fairly, honestly and openly;
 - Not offer / accept bribes to gain a business advantage either in lending or deposit taking transactions;
 - Not offer / accept bribes on behalf of the Bank;
 - Avoid doing business with others who do not agree with the Bank's commitment to the prohibition of bribery and corruption;
 - Keep clear and updated records on reported cases of bribery and corruption;
 - Adhere to the Bank's Code of Conduct;
 - Declare Conflict of Interests; and
 - Ensure that controls are working to prevent acts of bribery and corruption.

4.2. Bank's commitment to ethical business and behavior

4.2.1. Compliance with laws and regulations

CB adheres and complies with all laws, regulations and instructions mandated by the Qatar Central Bank (hereinafter 'QCB'). Moreover, CB complies not just with the letter, but also the spirit and intent of the laws. The Bank understands that violations

Anti-bribery & Corruption Policies (06-02-POL-004)

can lead to deterioration of the Bank's reputation, weaken customer confidence, and incur regulator criticism, legal, action, fines, and penalties.

In the event that a conflict exists between this Policy and regulatory pronouncements, the latter, shall take precedence. Employees are expected to know and comply with the laws and regulations, and if any such conflict arises, Legal shall be consulted.

CB shall abide by the following laws of Qatar in relation for bribery and corruption. Law No (11) of 2004 (Penal Code of Qatar) covers bribery offences relating to the bribing of public officials.

- Article 141 applies to a person offering money, interest or a promise to a public official who accepts the bribe. The person making the offer (and any intermediaries who facilitate the bribe) may be punished by up to ten years imprisonment and a fine not exceeding the amount of the bribe (but at least 5000 Riyals). However, the same article provides that the penalty shall not be applied if the person offering the bribe or the intermediary informs the concerned authorities about the offence before its discovery.
- Article 145 makes illegal the offer of bribery to an official who does not accept the offer.
- The Penal Code punishes all forms of bribery and its applicability is not limited to the person making the bribe but includes penalties for both the person offering the bribe and the person receiving it.

In addition, CB also follows international leading practices and regulations on Anti-Bribery and Corruption such as the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act of 1977 (hereinafter 'FCPA').

4.2.2. Ethical decision making

Employees shall conduct themselves with integrity and dignity and act at all times in an ethical manner in their dealings with the public, customers, employers and fellow employees. Acting ethically serves the interest of CB customers and stakeholders and is critical in achieving success in the longer term.

CB is accountable for its decisions and actions. Every employee shall be responsible in adhering to the Bank's principles and policies. This requires that decision making and actions taken should support an ethical workplace at CB and shall be in line with the Bank's Policy.

Anti-bribery & Corruption Policies (06-02-POL-004)

Employees shall practice sound ethical decision-making and ask themselves the following (at a minimum):

- Is the decision or action legal and compliant with the Bank's principles and policies?
- Can this decision or action be justified to a Senior Management/Board of Directors?
- Would the decision or action not cause loss or harm to CB customers, shareholders, or CB?
- Does the decision or action protect and enhance CB's reputation and help the wider community?
- Will the decision not expose the Bank to reputational and/or legal risk?

If the above questions are all yes, then the decision is in line with the Bank's Policy.

If unsure, employees shall seek guidance from their line manager / Human Capital / Compliance & Anti-Fraud and AB&C before proceeding.

If any of the above questions is answered a no; employees shall refrain as this action could lead to adverse repercussions.

4.2.3. Ethical best practices

In addition to compliance with applicable laws and regulations, all employees shall hold themselves to the highest standards of ethical conduct. All employees shall always deal fairly and in good faith with the Bank's customers, suppliers, competitors, business partners, regulators and other employees. They shall never take unfair advantage of anyone through manipulation, concealment, abuse of privileged or confidential information, misrepresentation of material facts or any other unfair dealings or practices.

4.2.4. Confidential information dealing

There are various stakeholders that do business with CB such as customers, vendors, agents, and others. These stakeholders rely on CB to be trustworthy and to protect confidential information relating to financial, personal or business matters. The loss or unauthorized disclosure or access of confidential information could result in harm to the Bank, customers, business partners, suppliers or employees. Furthermore, this disclosure can also expose the Bank to reputational, legal risk. Employees shall treat information entrusted to them as they perform their duties for CB as confidential; For more details refer to Employee handbook.

4.2.5. Insider trading and information barriers

Employees have access to “material non-public information” (hereinafter ‘MNPI’) about the Bank, customers, and other companies that CB conducts business with. If this information were to be disclosed to the public, it may likely impact the market price of CB or any other company CB does business with and which publicly trades in financial instruments or be considered important to a reasonable investor in deciding to buy or sells those securities.

MNPI is generally referred to as “insider information”. Buying or selling stocks using “insider information” is referred to as “insider trading”. It is illegal for any employee to use insider information for gain, related but not limited to personal gain or the gain of associates, people involved / related to the employees.

The best practice is to consider that all information has not yet been disclosed to the public unless it has been officially announced (for example, announcements on public domain, newspapers and or annual reports) or otherwise disseminated in a way that does not breach any confidentiality or fiduciary duty.

4.2.6. Avoiding conflicts

Personal interests of employees shall not conflict with CB interests. All employees of the Bank are responsible for avoiding activities or relationships that might affect their objectivity in making decisions as CB employees.

All employees shall identify and declare actual or potential Conflict of Interest (COI) using the COI declaration form as and when changes happen to already declared COI information which is mandatory.

4.3. Diversity and inclusion

At CB, it is expected that employees treat each other with respect and kindness, promoting an environment that enables everyone to reach their full potential. CB recognizes the power and importance of workplace diversity and values and respects each other’s differences. The Bank’s recruitment process is merit-based and any conflict of interest or corrupt behavior in order to seek employment shall not be tolerated.

4.4. Speak up

CB encourages employees to speak up when they are aware of any potential violations of CB Policy, law or regulation and obligates them to promptly report the violation. Employees shall escalate incidents of bribery and corruption through whistleblowing channels published on CB intranet.

All employees are encouraged to raise issues of concern and speak up when they suspect potential wrongdoing or are faced with conduct or situations that may raise ethical, legal or regulatory concerns.

Senior Management shall be responsible for fostering an environment where employees feel free to speak up i.e. express their views and concerns as well as to raise questions or escalate potential misconduct, unethical behavior, confident that they shall be heard and recognized.

Reporting unlawful conduct shall not be met with any adverse consequences from CB. The intimidation or retaliation against anyone who makes a good faith report about a potential or actual violation of any CB policy or procedure, or any law or regulation is strictly prohibited. CB also strictly prohibits any intimidation or retaliation against anyone who assists with any inquiry or investigation of any such violation.

5. Prohibited Behavior

5.1. Active bribery

The Bank mandates that employees shall never offer, promise, or pay bribes, including "facilitation payments", other improper payments or advantages to any person, including (but not limited to) employees, agents or officers of customers, suppliers, joint venture partners, labor unions, government or public officials or public servants (of any jurisdiction). This can include, for example, the offer of gifts, donations, rewards, advantages, hospitality or entertainment of any kind. Employees shall also never facilitate, mediate in, assist in or abet any such conduct.

5.2. Passive bribery

Employees shall refrain from requesting, soliciting, agreeing to receive or receiving a bribe from any person. This prohibition applies whether the bribe is accepted for the employees' own account or on behalf of another person.

For example, it is a breach of this Policy to promise to or to direct business to a supplier in return for any benefit, whether gifts, hospitality (such as attendance at sporting or cultural events or other recreational activities) or any other benefit.

A breach of this Policy shall arise where a bribe is offered, requested or solicited; there is no need for a bribe to actually be paid. The prohibition also applies where an employee offers or pays a bribe to another person, whether or not any benefit is received in return.

5.3. Kickback

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 the other party to cooperate in some illicit or illegal scheme.

5.4. Hospitality/Events 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 means of bribery when it is excessive and/or designed to improperly influence the recipient. 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 (improperly or otherwise) in the performance of official duties. Refer to Employee Handbook for more details;

5.5. Gifts

Gift acceptance

Employees should refrain from accepting gifts or entertainment from customers or suppliers, however if the customer/supplier insists, acceptance should be in accordance to employee handbook section Gifts received.

5.6. Political & 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 organizations; or
- is effectively a disguised bribe; or
- Is not officially registered as a charitable or political party in the state of Qatar..

5.7. Facilitation payments

Employees 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. customs clearance). For

Anti-bribery & Corruption Policies (06-02-POL-004)

the avoidance of doubt, facilitation payments do not include legitimate documented fees paid to government entities which are required under relevant law, rules or regulation, such as permit application fees paid to a licensing department.

Where an employee suspects a payment requested by a government official to be a facilitation payment, the payment shall not be made unless the can be satisfied that the payment is required by formal regulations.

Where an employee feels forced to make a payment on the basis that their safety, security or liberty may be threatened, they may make the payment but shall report the matter to Anti-Fraud and AB&C as soon as possible who shall decide on the appropriate action to be taken.

5.8. Business travel

Business travel expenditures can be misused to disguise corrupt behavior, such as in cases where an employee promises, offers, or provides business travel with the intention of receiving an improper benefit in return. Thus, employees shall adhere to Human Capital Employee Handbook with regards to business travels.

5.9. Conflict of Interest

A conflict of interest arises in situations where an employee's private arrangements, personal circumstances, personal or family relationships, benefits or interests (financial or otherwise), could (or could be perceived to) impinge a person's ability to act impartially. Conflict of interest can lead to unethical behavior, bank's reputational losses. Refer to Employee Handbook for details.

5.10. Personal gain

Employees shall not use confidential information about CB, its employees, customers, or suppliers entrusted to them, or otherwise became aware of in the course of their employment, for personal gain or the personal gain of the family, friends, or others.

5.11. Interaction with suppliers

It is important to know the Bank's customers and suppliers and ensure that CB works with people who share the Bank's commitment to honesty, integrity and upholding of the law.

CB has a Procurement Policy (11-03-POL-001) that formalizes the responsibilities, authorities and guidelines of all parties involved with Procurement under Banking operations. While wholly owned entities may be guided by their own policies, the Bank shall ensure that the same is not in conflict with stipulations contained in the CB Procurement Policy.

5.12. Interaction with customers

The Bank strives to treat all customers in a fair, ethical and non-discriminatory manner and work to achieve a competitive advantage through superior products and services and not through unethical or illegal business practices.

Employees shall only provide advice to customers when expressly authorized and qualified to provide.

All customer facing employees shall understand the customers' needs, expectations and interest in order to provide them with appropriate solutions that lead to the right outcomes based on their stated requirements, sophistication and attitude to risk.

5.13. Discouraging customers and enticing colleagues

Doing the right thing by CB customer is integral to CB culture. The Bank shall treat its customers fairly and shall not favor the interest of one customer over another. Customers shall be provided with the information they need to make informed decisions, all employees shall always put customer needs first when given advice, ensure products and services are suitable for customers, and listen to, act on customer complaints.

5.14. Respect for competition

Fair and effective markets are essential for an efficient and growing economy. CB is committed to upholding and protecting the integrity of markets. Anti-competitive behavior is rejected and the Bank is committed to building a culture of responsibility and integrity to better serve the interests of customers.

Promoting free and fair competition is a commitment of CB, which means:

- Complying with competition laws in all jurisdictions in which CB operates
- Never seeking competitive advantage through unethical or illegal practices
- Always cooperating with market regulators
- Always taking care to act fairly and with integrity in commercial relationships with customers, suppliers and/or distributors, and to ask advice from the appropriate legal manager in case of doubt.

5.15. Employment and Work Experience

The recruitment and selection method helps the Bank consistently source and select the best talent in an efficient and cost-effective way. This approach promotes fairness through transparent merit-based assessment and ensures that the Bank meets its legal obligations. Refer to Employment Handbook for details.

5.16. Marketing Sponsorships

All marketing sponsorships shall be reviewed and approved in line with the Delegation of Authority Matrix. CB shall pay special consideration to sponsorships which provides the Bank opportunities to invite third parties to exclusive entertainment events. Such activities may create the risk or appearance that they will be used to improperly influence the award/retention of business or other advantage. The Bank shall also review sponsorships requested by a Public Official, customer or potential customer or where the facts and circumstances indicate that such an individual may derive an improper personal benefit from the FI's sponsorship.

6. Investigation Procedures

6.1. Investigations procedures to address complaints

Investigation on breaches to this Policy shall be conducted by Anti-Fraud and AB&C in line with the Anti-Fraud Policy and Fraud Investigation and Enforcement Protocol. Refer to above policies and protocol for details.



7. Anti-Bribery and Corruption Training

7.1. Requirements

AB&C general training – which can either be standalone or incorporated within other compliance related training – shall be provided to all employees.

7.2. Frequency

AB&C training to be mandated by HC for new joiners and to be conducted once every two years for existing staff.

7.3. Frequency of training updates

The frequency of training updates shall be determined by Compliance & Anti-Fraud and AB&C department as deemed necessary.

8. Principal Contact

8.1. List the relevant contacts for matters related to AB&C

Department / Role	Contact
Board Risk and Compliance Committee	
Compliance Risk Committee	
Chief Compliance Officer	

Related Documentation

II. Abbreviations

Abbreviation	Meaning
BRCC	Board Risk & Compliance Committee
CB	Commercial Bank
COI	Conflict of interest
DRC	Disciplinary Review Committee
MNPI	Material Non-Public Information
QCB	Qatar Central Bank

III. Appendices

Appendix A: Policies Manual Revision Proposal Form

Policies Manual Revision Proposal Form		
Reference :	Date:	
Originated by :	Position:	
Matters proposed to be revised:		
Section No.:	Section Name :	
Policy No.		
Reviewed, no amendments.		
Reasons for proposed revisions		
Other comments		
Approved by :	Signatories	Effective Date

Note: This signed document should be submitted to Policies & Procedures Unit

Appendix B: Policies Manual Distribution and Acknowledgement Form

Policies Manual Distribution and Acknowledgement Form	
Policies Manual	
Version Number	
Name of the Employee	
Date of Acknowledgement	
Employee Signature	

Note: This signed document should be submitted to Policies & Procedures Unit

Appendix C: Red flag scenarios

The following list identifies potential (but not all) red flags or unusual circumstances that shall be investigated and reported:

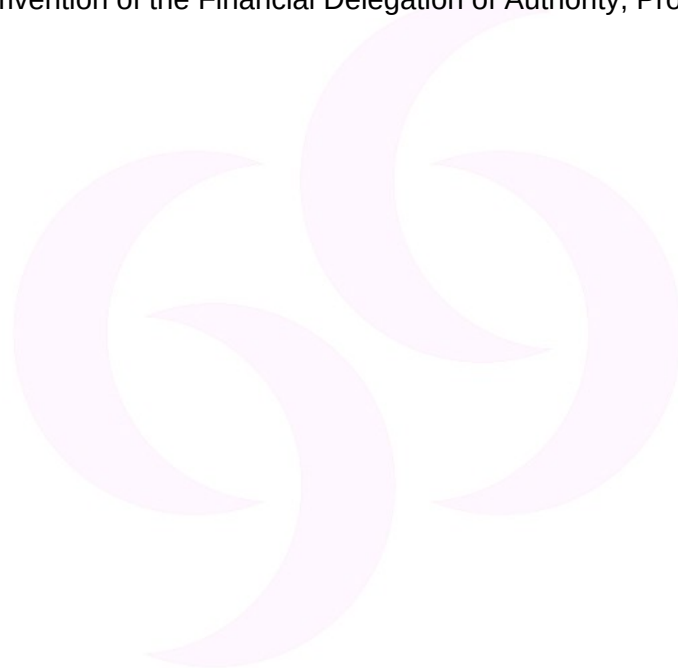
Anti-bribery & Corruption Policies (06-02-POL-004)

- any payment that is not made against invoice nor supported by documentary evidence (e.g. purchase orders / contracts etc.) that goods or services were, in fact, provided;
- commissions paid to intermediaries or partners substantially in excess of the going rate;
- requests for commission payments to intermediaries in cash, to or through a third party, or to jurisdictions other than the country where services, and the underlying contract, are performed or where the intermediary has its principal place of business (especially to a bank secrecy jurisdiction, such as Cyprus, the Cayman and British Virgin Islands);
- the reputation of a country or a government official for corruption. While generally this is not sufficient by itself to warrant the requisite knowledge of a bribe payment, it does suggest the advisability of enhanced due diligence procedures. Transparency International publishes annually a Corruption Perceptions Index, which can be found at: http://www.transparency.org/policy_research/surveys_indices/cpi;
- reports of improper payments or other unethical business practices by an employee, intermediary or agent;
- a request for an unusual or substantial commission, upfront payment or success bonus, or unusual discounts for distributors;
- an invoiced amount from an intermediary that exceeds the agreed upon amount or reflects undocumented expenses or expenses of an unreasonable amount or kind;
- use of more than one intermediary on a particular contract where aggregate commissions exceed the going rate (or legal ceiling) in the country and an economic rationale for the use of a second intermediary is inadequate, illusory or absent;
- the intermediary is a foreign official or a person employed by a foreign government agency or instrumentality who works for the intermediary;
- the intermediary is an active or retired government official or related to a government official, or such third party company is owned in whole or in part by a government official or relative of a government official;
- the intermediary or a partner or a director, shareholder or employee of the intermediary partner's firm has a personal, family or business relationship with a foreign official;
- apparent lack of qualifications, track-record or resources on the part of the intermediary or partner to perform the services offered;
- the intermediary requests or is concerned that the relationship with the Bank be kept anonymous or confidential;
- there are suspicions about the reputation of an intermediary or partner because there are rumors of "connections", and he or she is less than forthcoming with information regarding these matters;
- the intermediary refuses to accept an Anti-Bribery & Corruption compliance clause in the contract, refuses to implement reasonable and customary compliance measures or refuses to comply with a reasonable request related to anti-bribery or anti-corruption compliance;
- lack of transparency in expenses and accounting records;

Anti-bribery & Corruption Policies (06-02-POL-004)

- an intermediary or partner is known to provide entertainment, gifts, hospitality or use of corporate facilities to foreign officials, political leaders or their families in their own country or elsewhere;
- the intermediary makes reference to political or charitable contributions as a way of influencing official action;
- the proposed agreement between the Bank and the intermediary is illegal under local law; and
- an employee has continually accepted poor quality vendors or third party service providers, especially after complaints have been made on services provided by them;

In addition to the above, any circumvention of the Financial Delegation of Authority, Procurement Policy and Bank's procedures shall be considered as a red flag.



Appendix D: Gift Declaration Form

Gift Declaration Form	
Name of Employee:	Date:
Department:	Position:
Gift Description:	Received From:
Mode of receipt: a) In person b) Mail	Relationship with the offerer of the gift: a) Customer b) Vendor c) Other
Purpose of the gift: (This will be indicative)	Date of receipt:
Handover date:	Gift handed over to:
Employee Signature:	Acknowledgement:

SIGNATURE CERTIFICATE





REFERENCE NUMBER

2FCF35E2-2AC9-48A5-9184-D7AC269A41E3

TRANSACTION DETAILS	DOCUMENT DETAILS
<p>Reference Number 2FCF35E2-2AC9-48A5-9184-D7AC269A41E3</p> <p>Transaction Type Signature Request</p> <p>Sent At 03/12/2023 01:59 EST</p> <p>Executed At 03/12/2023 03:24 EDT</p> <p>Identity Method email</p> <p>Distribution Method email</p> <p>Signed Checksum 694b06f9031e6235cd238bbf1452dfbb4a1eb458edfc8b7eb2b88de3ddb6f2c1</p> <p>Signer Sequencing Disabled</p> <p>Document Passcode Disabled</p>	<p>Document Name 06-02-Pol-004 - Anti Bribery And Corruption Policy V6 Sdz</p> <p>Filename 06-02-pol-004_-_anti_bribery_and_corruption_policy_v6_sdz.docx</p> <p>Pages 32 pages</p> <p>Content Type application/vnd.openxmlformats-officedocument.wordprocessingml.document</p> <p>File Size 200 KB</p> <p>Original Checksum 50b2cd7b1b972de467c0672eb5e4acb078eb6246c9a1c60974dccc1e3b7d47d5e</p>

SIGNERS

SIGNER	E-SIGNATURE	EVENTS
<p>Name Abdulla Ahmed A A Al-Fadli</p> <p>Email abdulla.alfadli@cbq.qa</p> <p>Components 1</p>	<p>Status signed</p> <p>Multi-factor Digital Fingerprint Checksum 1ac17003c36f1d2ae254cb6a2b591b7119fe8433265119e0f8900924793b5516</p> <p>IP Address 31.11.50.118</p> <p>Device Microsoft Edge via Windows</p> <p>Typed Signature </p> <p>Signature Reference ID 6BCBF6AB</p>	<p>Viewed At 03/12/2023 03:23 EDT</p> <p>Identity Authenticated At 03/12/2023 03:24 EDT</p> <p>Signed At 03/12/2023 03:24 EDT</p>
<p>Name Dmitry Artemiev</p> <p>Email dmitry.artemiev@cbq.qa</p> <p>Components 1</p>	<p>Status signed</p> <p>Multi-factor Digital Fingerprint Checksum 563dac5ca44a1177649018f5129f29fb989593b3e9129385737fcb2b8d5f82d9</p> <p>IP Address 31.11.50.118</p> <p>Device Chrome via Windows</p> <p>Typed Signature </p> <p>Signature Reference ID 87248E33</p>	<p>Viewed At 03/12/2023 03:01 EDT</p> <p>Identity Authenticated At 03/12/2023 03:09 EDT</p> <p>Signed At 03/12/2023 03:09 EDT</p>
<p>Name Shivanka J De Zoysa</p> <p>Email shivanka@cbq.qa</p> <p>Components 1</p>	<p>Status signed</p> <p>Multi-factor Digital Fingerprint Checksum 33c9c69b337e658fb9ce53792018363ac71ec2e23c3d9646b35ef477eb84ed8a</p> <p>IP Address</p>	<p>Viewed At 03/12/2023 03:04 EDT</p> <p>Identity Authenticated At 03/12/2023 03:05 EDT</p> <p>Signed At 03/12/2023 03:05 EDT</p>

31.11.50.118

Device

Chrome via Windows

Typed Signature



Signature Reference ID

C62E633D

AUDITS

TIMESTAMP	AUDIT
03/12/2023 01:59 EST	Alanoud Al-Naimi (alanoud.alnaimi@cbq.qa) created document '06-02-pol-004_-_anti_bribery_and_corruption_policy_v6_sdz.docx' on Microsoft Edge via Windows from 31.11.50.118.
03/12/2023 01:59 EST	Dmitry Artemiev (dmitry.artemiev@cbq.qa) was emailed a link to sign.
03/12/2023 01:59 EST	Shivanka J De Zoysa (shivanka@cbq.qa) was emailed a link to sign.
03/12/2023 01:59 EST	Abdulla Ahmed A A Al-Fadli (abdulla.alfadli@cbq.qa) was emailed a link to sign.
03/12/2023 03:01 EDT	Dmitry Artemiev (dmitry.artemiev@cbq.qa) viewed the document on Chrome via Windows from 31.11.50.118.
03/12/2023 03:04 EDT	Shivanka J De Zoysa (shivanka@cbq.qa) viewed the document on Chrome via Windows from 31.11.50.118.
03/12/2023 03:05 EDT	Shivanka J De Zoysa (shivanka@cbq.qa) authenticated via email on Chrome via Windows from 31.11.50.118.
03/12/2023 03:05 EDT	Shivanka J De Zoysa (shivanka@cbq.qa) signed the document on Chrome via Windows from 31.11.50.118.
03/12/2023 03:09 EDT	Dmitry Artemiev (dmitry.artemiev@cbq.qa) authenticated via email on Chrome via Windows from 31.11.50.118.
03/12/2023 03:09 EDT	Dmitry Artemiev (dmitry.artemiev@cbq.qa) signed the document on Chrome via Windows from 31.11.50.118.
03/12/2023 03:23 EDT	Abdulla Ahmed A A Al-Fadli (abdulla.alfadli@cbq.qa) viewed the document on Microsoft Edge via Windows from 31.11.50.118.
03/12/2023 03:24 EDT	Abdulla Ahmed A A Al-Fadli (abdulla.alfadli@cbq.qa) authenticated via email on Microsoft Edge via Windows from 31.11.50.118.
03/12/2023 03:24 EDT	Abdulla Ahmed A A Al-Fadli (abdulla.alfadli@cbq.qa) signed the document on Microsoft Edge via Windows from 31.11.50.118.