

Scope/ Coverage QNB Group**Publication Date October 2025****Version 2.0**

At QNB Group (QNB or the Bank hereafter), an emphasis on the way of doing things is just as important as what we do. It is QNB's policy to conduct all business in an honest and ethical manner. QNB takes a zero-tolerance approach to bribery and corruption and in implementing and enforcing effective systems to counter bribery and corruption.

Purpose

The purpose of this policy statement is to describe QNB's responsibilities and of those working for the Bank in observing and upholding its position on bribery and corruption. It covers key principles and responsibilities for preventing and combating bribery and corruption. It serves to raise awareness among QNB staff to avoid actions connected to bribery and corruption, the consequences of corrupt actions and the proper use of whistleblowing channels to encourage confidential reporting of suspicions through the appropriate communication channels in order to protect the Bank's image and reputation.

Scope

At QNB Group, we are committed to maintaining the highest standards of integrity and ethical conduct. Our Anti-Bribery and Corruption (ABC) Policy is a formal document that outlines our zero-tolerance approach to bribery and corruption. This policy is aligned with global standards and best practices, ensuring robust governance within our organization. We have implemented comprehensive systems and procedures to prevent, detect, and address any instances of bribery and corruption. Our policy applies to all employees, subsidiaries, affiliates, and third parties acting on behalf of QNB Group. We provide regular training and awareness programs to ensure continuous compliance and uphold our commitment to ethical business practices.

Responsibilities:

The Board of Directors (BOD) of QNB are responsible for approving and overseeing the implementation of this policy.

The Senior Management of QNB are responsible for establishing all necessary procedures for the appropriate implementation of the Policy and for the training of their personnel in bribery related matters in order to ensure continuous awareness and compliance.

Group Compliance Division at QNB manages anti-bribery and corruption aspects and supports the BOD and Senior Management at QNB in fulfilling related obligations. Group Compliance maintains responsibility of periodically reviewing the appropriate implementation of the policy and when necessary training of employees on bribery and corruption related matters.

All employees and personnel associated with QNB are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. Employees are obliged, if they have reason to believe or suspect that, an instance of bribery or corruption has occurred or will occur in the future to report accordingly as per the whistle-blowing mechanism.

Definitions:

- Bribery, in broad terms, is the receiving or offering of undue reward or anything of value and includes payments to secure a business advantage, financial or otherwise, to which the bank is not entitled. Bribery is defined as the promise, offer/acceptance directly or indirectly of anything of value to induce or reward the improper performance of an activity.
- Corruption is defined as the misuse of entrusted power for personal or private gain. While the primary focus of anti-corruption is on bribery, other forms of corruption include, but not limited to, embezzlement, theft, fraud, extortion, conflict of interest and illegal charitable / political contributions. It is also an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.
- Facilitation payments are small amounts of money given to public officials to expedite or secure the performance of routine, lawful duties. These payments are not considered bribes, but they are illegal in many countries.
- Kickbacks are secret payments made in return for a favor or service, often in the context of business transactions. These payments are typically made to intermediaries who facilitate the transaction and are considered a form of corruption.
- A conflict of interest occurs when an individual's personal interests could potentially influence their professional decisions or actions. Such conflicts can compromise impartiality and fairness in decision-making processes.

Broad Principles:

- In particular, directly or indirectly offering, giving, soliciting or receiving any form of bribe, facilitation, kickback or other corrupt payment, or anything of value, to or from any person or organization, including government agencies, individual government officials, public officials, private companies and employees of those private companies under any circumstances is prohibited.
- It is prohibited for bank employees to ask for gifts from customers, suppliers or other third parties that they have relations with on behalf of the Bank, directly or indirectly.
- Where QNB engages third parties, it has the obligations to complete sufficient due diligence when entering into arrangements to ensure that they are not acting corruptly.
- This policy does not prohibit normal and appropriate gift and hospitality (given and received) to or from third according to the limit set out in the related procedure. Exchanges of reasonable and courtesy business gifts and hospitality are part of our business practices and allowed if they are transparent, proportional, reasonable and of a bona fide nature and following the stringent protocol in place at QNB.
- All bank employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by the Bank.
- QNB permits charitable donations (with prior approval) and sponsorships but these must not be offered to gain a business advantage.

Donations should only be made to valid registered charitable organizations and foundations that the Bank do not have any conflict of interest with.

- QNB Group shall not make any political donations, which means donations for political purposes to any politician, political party or related organization, official of a political party or candidate for political office in any circumstances directly or through third parties.
- In any case, offering or receiving gifts in the form of cash or similar, irrespective of the amount, is strictly forbidden.

QNB Group has established comprehensive operating guidelines that address record-keeping, approval procedures, and appropriate behavior to ensure compliance with our Anti-Bribery and Corruption (ABC) Policy.

QNB Group conducts regular ABC-related risk assessments and performs continuous case-by-case evaluations to ensure compliance and mitigate potential risks.

Failure to ensure compliance with this Policy could lead to the following consequences for QNB Group

1. Criminal or civil liabilities for the Bank including fines and imprisonment;
2. Serious reputational damage including media coverage for the Group;
3. Financial losses;
4. The unenforceability of contracts entered into as a result of acts of bribery, fraud or other illegality

Training:

All QNB Group employees have a primary responsibility to comply with this policy and related requirements. QNB provides appropriate and clear mandatory anti-bribery and anti-corruption awareness and trainings on annual basis to all employees. Employees are expected to adopt the highest standards of professional and personal behaviors and demonstrate respect, integrity, good judgment, honesty and trust, the right way in all actions, no matter the circumstances.

Disciplinary Action

Failure to comply with this policy, whether or not this is intentional, may lead to disciplinary action and criminal liability for the individual involved in line with Human Capital Global policy.

Reporting:

QNB ensures that the appropriate tools are provided to employees for reporting suspicions or violations in confidence (whistle blowing) in case of bribery and corruption incidents.