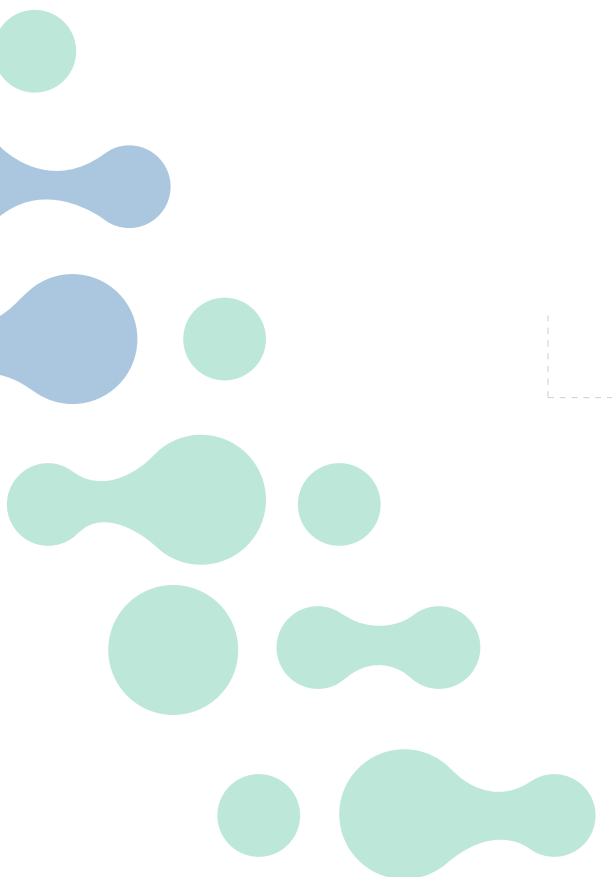


Foundational Policies

November 2021





INTRODUCTION TO THE POLICIES

QatarEnergy's policies are outlined on the following pages. They deal with all aspects of the organization's business conduct, and legal and regulatory compliance.

This suite of policies represents an important milestone as it outlines our commitments as an organization and our expectations of all those who work at and with QatarEnergy.

They are the embodiment of our Values and, when practiced, will help to bring our Code of Conduct to life. They underline QatarEnergy's commitment to ethical leadership, sustainable business practices and operational excellence.

Please read these policies carefully and ensure that you understand them. Review our commitments and expectations to ensure that you are able to follow the policies in everything that you do with and for QatarEnergy.



Human Rights Policy
Occupational Health and Safety Policy
Privacy of Personal Information Policy
Respectful Workplace Policy



INTRODUCTION

We believe that our success in supporting Qatar's National Vision 2030 is dependent on applying principled standards of business conduct, ones that create trust-based relationships with our people, business partners and the communities in which we operate. We conduct business in compliance with the principles established in our Code of Conduct, our values, and the laws and regulations applicable in the countries where we operate. This Policy describes our commitment to human rights and defines our minimum compliance requirements.

OUR COMMITMENTS

Our respect for human rights is inspired by the Universal Declaration of Human Rights and guided by the constitution of Qatar.

- We treat those working for and with us, fairly and with dignity and respect.
- We will not tolerate any discrimination on the grounds of race, age, disability, gender or political or religious beliefs.
- We provide safe, healthy and secure working conditions.
- We respect the human rights of all people impacted by our activities, with particular attention to the rights of more vulnerable people such as migrant workers and indigenous populations.
- We promote proactive engagement with communities and identify opportunities to optimize positive impacts in ways that are respectful and appropriate to local culture.
- We do not engage in, tolerate or work with business partners who:
 - employ children and minors
 - engage in human trafficking or forced, bonded or compulsory labor
 - have employees that are not free to leave their employment after reasonable notice
 - require employees to lodge deposits of money or identity papers with their employer.
- This Policy is embedded into our processes, practices and corporate culture through communications and training.
- We apply human rights' due diligence to our operating model and aim to apply effective prevention, mitigation and remediation actions as required.
- We undertake regular monitoring and reporting in order to improve our efforts.
- We comply with the human rights' laws and regulations applicable in the countries in which we operate and strive to ensure respect for human rights. Where applicable laws or regulations prohibit us from upholding this policy, we strive to ensure respect for human rights in the greatest way possible.

EXPECTATIONS AND APPLICABILITY

Where this Policy sets higher standards than those required locally, the higher requirements of this Policy will apply. It is everyone's duty to speak up if they observe or suspect a violation of this Policy. We expect our majority-owned subsidiaries and joint ventures to comply with this Policy or create and adopt one of a similar nature. We will only work with those who share our standards of business conduct and values.

INTRODUCTION

The health and safety of people are central to all of our business activities. Safety is a core value at QatarEnergy, and we aim to achieve “no harm” and for everyone to go home safely each day. The purpose of this Policy is to set out our health and safety commitments as per our Code of Conduct and values, and to define our minimum compliance requirements when considering our employees and all persons doing business with QatarEnergy.

OUR COMMITMENTS

- We commit to eliminate and reduce occupational health and safety risks, and to their effective management and reporting.
- We are proactive in the prevention of work-related illnesses and injuries.
- We provide a healthy and safe workplace for our employees and business partners.
- We prevent safety incidents and respond comprehensively, should they occur.
- We work to protect QatarEnergy’s assets, employees, business partners and communities.
- We consult and seek participation of staff and workers’ representatives if they exist.
- We commit to strong, visible leadership with a culture of shared responsibility and accountability.
- We comply with applicable laws and regulations and encourage our business partners to comply.
- We aim for continuous improvement of our Occupational Health and Safety Management System through regular monitoring and reporting on performance.
- We provide the right resources, processes and training to ensure the competence of our people.
- We conduct ongoing consultation and collaboration with all external stakeholders.
- The Occupational Health and Safety Management System is integrated with other elements of QatarEnergy’s Quality, Environment, and Business Continuity Management Systems.

EXPECTATIONS AND APPLICABILITY

Everyone working for QatarEnergy shares the responsibility for occupational health and safety. This is demonstrated through active engagement and compliance with our Occupational Health and Safety Management System.

QatarEnergy Managers shall strive to adhere to the requirements of QatarEnergy’s Occupational Health and Safety Management System through:

- setting improvement-oriented occupational health and safety objectives and monitoring progress against this Policy
- routinely monitoring and reviewing performance of our Occupational Health and Safety Management System and processes
- identification, elimination or control of occupational and safety hazards and risks.

Where this Policy sets higher standards than those required locally, the higher requirements of this Policy will apply. It is everyone’s duty to speak up if they observe or suspect a violation of this Policy. We expect our majority-owned subsidiaries and joint ventures to comply with this Policy or create and adopt one of a similar nature. We will only work with those who share our standards of business conduct and values.

INTRODUCTION

The collection of personal data and information plays an important role in our ability to manage our organization effectively and deliver a better experience for stakeholders. We respect the privacy of our people and commit to acting responsibly when collecting, processing, retaining, disclosing and disposing of personal information. We conduct business in compliance with the principles established in our Code of Conduct, our values, and the laws and regulations applicable in the countries where we operate. This Policy describes our commitment to high standards when managing employees and external stakeholders' information and defines our minimum compliance requirements.

OUR COMMITMENTS

- We always process personal data, (all information relating to any identifiable individual) fairly and lawfully, and only for a specified, explicit and legitimate business purpose or as required by law.
- In most cases, we collect personal data directly from individuals when establishing a business relationship or through operational dealings.
- When required to collect sensitive information of a personal nature, we do so with great care and only when necessary, and we do not knowingly solicit or collect personal data from children, except under exceptional circumstances related to schooling, medical services and in areas where such information is needed to apply our HR policies. Such data collection happens only with appropriate parental permissions.
- We only keep data for as long as is strictly necessary for the purpose for which it was collected, and for as long as is necessary to comply with legal obligations.
- We aim to maintain accuracy, confidentiality and security of personal information and have implemented appropriate safeguards.
- We only share personal data with others when there is a legitimate business or legal need to do so.
- We will never lease, distribute or sell personal information to third parties unless we have an individual's permission, or the law requires us to do so.
- Where personal data has been transferred to companies within the QatarEnergy group and/or to authorized third parties located outside Qatar, we take measures to ensure that it is processed exclusively for the purposes mentioned above and that adequate levels of protection are implemented.
- We respect the rights of individuals to review and update personal information.
- Where we work with suppliers and consultants, we make clear the importance of our standards on data privacy.

EXPECTATIONS AND APPLICABILITY

We require employees and all persons doing business with QatarEnergy to comply with this Policy.

- Everyone at QatarEnergy is responsible for protecting personal data about each other and our business partners, including other external stakeholders who do business with QatarEnergy.

Where this Policy sets higher standards than those required locally, the higher requirements of this Policy will apply. It is everyone's duty to speak up if they observe or suspect a violation of this Policy. We expect our majority-owned subsidiaries and joint ventures to comply with this Policy or create and adopt one of a similar nature. We will only work with those who share our standards of business conduct and values.

INTRODUCTION

People are at the heart of our organization. Our success depends on a safe workplace culture and an environment of mutual respect where everyone is treated with fairness and dignity. We conduct our business in compliance with the principles established in our Code of Conduct, our values, and the laws and regulations applicable in the countries where we operate. This Policy describes our commitment to the highest standards of behaviour. It also communicates our expectations when we work with each other, with business partners and with other external stakeholders, and defines our minimum compliance requirements.

OUR COMMITMENTS

- We treat everyone with respect and are committed to maintaining a workplace free from any unjust treatment.
- We do not tolerate discrimination of suppliers, partners or communities affected by our operations.
- All employees have the right to work in an environment that is free from intimidation, harassment and abuse, and we do not allow bullying or exploitation of positions of power.
- We value diversity and commit to providing an inclusive culture that allows everyone to make, and be recognized for their contribution.
- We hire, engage, develop and promote employees based on competencies and performance.
- In Qatar, in the context of our national vision for human development, we place a particular and positive emphasis on the hiring, engagement and development of Qatar nationals.
- We commit to making all employees of the organization aware of the provisions of this Policy and ensure that adequate resources are made available to fulfil its objectives.
- We provide employees with effective mechanisms for responding to potential violations of this Policy.
- We monitor our progress against this Policy and report on our performance at regular intervals.

EXPECTATIONS AND APPLICABILITY

We require employees and all persons doing business with QatarEnergy to comply with this Policy.

- All employees play a role in ensuring a respectful workplace by treating everyone in a considerate and professional manner, and questioning any inappropriate behaviour.
- Managers are responsible for creating a safe and open working environment that emphasizes our core value of respect as a standard of performance.
- Managers who are advised of discrimination or harassment must report it to the Human Resources Department.
- If a manager becomes aware of a threat or incident of violence, they must immediately contact the Human Resources Department.
- In an emergency and if there is a direct and immediate threat to life or an incident of violence, employees must contact the relevant authorities and intervene if it is safe for them to do so.

Where this Policy sets higher standards than those required locally, the higher requirements of this Policy will apply. It is everyone's duty to speak up if they observe or suspect a violation of this Policy. We expect our majority-owned subsidiaries and joint ventures to comply with this Policy or create and adopt one of a similar nature. We will only work with those who share our standards of business conduct and values.

Anti-Bribery and Corruption Policy
Anti-Fraud Policy
Anti-Money Laundering Policy
Asset Protection Policy
Competition Policy
Confidential Information Policy
Conflicts of Interest Policy
External Communication and Disclosure Policy
Regulatory Compliance Policy
Trade Compliance Policy

INTRODUCTION

All forms of corruption are damaging to our business and our reputation. We conduct business in compliance with the principles established in our Code of Conduct, our values, and the laws and regulations applicable in the countries where we operate. This Policy defines QatarEnergy's global stance and minimum compliance requirements on bribery and corruption.

OUR COMMITMENTS

- We are committed to the highest standards of ethical conduct with zero tolerance for any form of bribery or corruption.
- We work proactively to ensure that corruption does not occur throughout our operations and supply-chain, both within Qatar and internationally.

EXPECTATIONS AND APPLICABILITY

We require employees and all persons doing business with QatarEnergy to comply with this Policy. Non-compliance may have serious consequences for QatarEnergy, its affiliates and the individuals involved, and may result in criminal and civil proceedings, possible damage claims, significant fines and/or possible imprisonment. QatarEnergy's reputation may also be damaged through adverse publicity or negative impact to our organizational goodwill.

Employees and all persons doing business with QatarEnergy are prohibited from:

- offering, authorizing, giving, paying, soliciting, accepting or receiving, either directly or indirectly, a bribe to or from any employee, official (including a public official), or agent of any government, public or commercial entity, or individuals, in connection with the business or activities of QatarEnergy
- the giving or receiving of an improper advantage through undue influence, preferential treatment or any form of improper payment
- the making or receiving of facilitation payments.

The above prohibitions do not apply to the situations where an individual's health, life and liberty are at risk.

Where this Policy sets higher standards than those required locally, the higher requirements of this Policy will apply. It is everyone's duty to speak up if they observe or suspect a violation of this Policy. We expect our majority-owned subsidiaries and joint ventures to comply with this Policy or create and adopt one of a similar nature. We will only work with those who share our standards of business conduct and values.



INTRODUCTION

Fraud is a serious crime and will not be tolerated at QatarEnergy. At QatarEnergy, we conduct business in compliance with the principles established in our Code of Conduct, our values, and the laws and regulations applicable in the countries where we operate. This Policy defines QatarEnergy's global stance and minimum compliance requirements for the prevention of fraud and its obligations to comply with all applicable laws in Qatar and internationally.

OUR COMMITMENTS

- We are committed to the highest standards of ethical conduct with zero tolerance for any form of fraud.
- We work proactively to ensure that fraud does not occur throughout our operations and supply-chain, both in Qatar and internationally.

EXPECTATIONS AND APPLICABILITY

We require employees and all persons doing business with QatarEnergy to comply with this Policy and prohibit them from engaging in any form of fraudulent activities. Non-compliance may have serious consequences and may result in criminal and civil proceedings, possible damage claims, significant fines and/or possible imprisonment. QatarEnergy's reputation may also be damaged through adverse publicity or negative impact to our organizational goodwill.

- Employees and all persons doing business with QatarEnergy must ensure that they are aware of their responsibilities under this Policy.
- Line management and relevant functions are required to establish and maintain a control environment and systems of fraud prevention and detection in line with their respective responsibilities.

Where this Policy sets higher standards than those required locally, the higher requirements of this Policy will apply. It is everyone's duty to speak up if they observe or suspect a violation of this Policy. We expect our majority-owned subsidiaries and joint ventures to comply with this Policy or create and adopt one of a similar nature. We will only work with those who share our standards of business conduct and values.

INTRODUCTION

QatarEnergy's business requires us to trade internationally and with foreign entities. We conduct business in compliance with the principles established in our Code of Conduct, our values and the laws and regulations applicable in the countries where we operate. This Policy defines QatarEnergy's position and minimum compliance requirements with respect to the global prevention of money laundering and terrorism financing.

OUR COMMITMENTS

- We are committed to the highest standards of ethical conduct and to compliance with all applicable domestic and international anti-money laundering and counter-terrorism financing laws and regulations.
- We will only perform financial transactions with verified recipients and financial institutions for legitimate and substantiated expenses, and in accordance with properly executed contractual commitments.

EXPECTATIONS AND APPLICABILITY

We require all employees and all persons doing business with QatarEnergy and responsible for, or involved in, the execution of financial transactions to comply with this Policy. We expect that they will not engage or assist in any form of illegal activities or conduct that is inconsistent with the requirements of this Policy. Non-compliance may have serious consequences and may result in criminal and civil proceedings, possible damage claims, significant fines and/or possible imprisonment. QatarEnergy's reputation may also be damaged through adverse publicity or negative impact to our organizational goodwill.

- Employees and all persons doing business with QatarEnergy must take care to avoid suspicious transactions involving numerous or unusual counter parties and/or monetary transfers. This includes relationships with customers, suppliers, business partners, financial institutions, agents, intermediaries, consultants and other third parties, especially when unusual or suspicious monetary requests are sought.
- Employees and all persons doing business with QatarEnergy need to be familiar with and understand the identity of the people and organizations, including its beneficial ownership, with which QatarEnergy does business.
- We ensure that rigorous due diligence is undertaken, in accordance with relevant QatarEnergy procedures.
- Everyone shares a responsibility to bring concerns about the source or use of funds, irregular payments or unusual transactions to the attention of the QatarEnergy Legal Department as and when the concerns present themselves.

Where this Policy sets higher standards than those required locally, the higher requirements of this Policy will apply. It is everyone's duty to speak up if they observe or suspect a violation of this Policy. We expect our majority-owned subsidiaries and joint ventures to comply with this Policy or create and adopt one of a similar nature. We will only work with those who share our standards of business conduct and values.

INTRODUCTION

QatarEnergy property and assets can take many forms, both tangible, such as facilities and equipment, and intangible such as information and intellectual property. Our assets enable us to work effectively so they are valuable for our organization and critical to our success. We conduct business in compliance with the principles established in our Code of Conduct, our values, and the laws and regulations applicable in the countries where we operate. This Policy defines QatarEnergy's position and minimum compliance requirements with respect to asset protection.

OUR COMMITMENTS

- We respect, responsibly manage and protect our assets against damage, theft or unauthorized use by QatarEnergy employees and others.
- We do not use assets for personal benefit. Occasional personal usage of IT assets is permitted, as long as it does not compromise the interests of QatarEnergy or adversely affect job performance.
- We allow third party usage of our assets only when there is a clear underlying business purpose, or a clear public benefit from their use.
- We respect assets owned by others while ensuring that ours are also respected.
- We commit to providing the appropriate means and resources to protect our assets, including implementing technological solutions and procedures aimed at preventing misuse of information technology.
- We promote the awareness and understanding of asset protection to all employees through communication and training.
- We promote a safe and secure work environment by managing assets effectively and considering and mitigating risks appropriately.
- We commit to continuous improvement in the protection of our assets by:
 - establishing objectives for improvement and goals to systematically protect our assets
 - assessing performance and applying the necessary corrections to achieve the proposed goals.

EXPECTATIONS AND APPLICABILITY

We require employees and all persons doing business with QatarEnergy to comply with this Policy.

- Everyone working for and at QatarEnergy is responsible for protecting QatarEnergy's property and assets.
- Employees must prevent non-authorized personnel from accessing our facilities, information, data or other assets.
- Any use of QatarEnergy's assets for purposes not directly related to our business, unless specifically provided for in this Policy, requires permission from a supervisor.

Where this Policy sets higher standards than those required locally, the higher requirements of this Policy will apply. It is everyone's duty to speak up if they observe or suspect a violation of this Policy. We expect our majority-owned subsidiaries and joint ventures to comply with this Policy or create and adopt one of a similar nature. We will only work with those who share our standards of business conduct and values.



INTRODUCTION

QatarEnergy believes in competing fairly. We conduct business in compliance with the principles established in our Code of Conduct, our values, and the laws and regulations applicable in the countries where we operate. This Policy defines QatarEnergy's position and minimum compliance requirements in relation to fair competition.

OUR COMMITMENTS

- We comply with all applicable domestic and international anti-trust and competition laws and regulations, and with the principles of free, transparent and fair competition.
- We do not engage in anti-competitive conduct, or act illegally or unethically when dealing with customers, competitors, suppliers, contractors or joint venture partners. This includes unreasonable restraint of trade, unfair trade, exclusionary practices or other anti-competitive behaviour.
- We do not share QatarEnergy's non-public and commercially and competitively sensitive information with actual or potential competitors or make unauthorized disclosure of such to other parties in breach of applicable competition and anti-trust laws.

EXPECTATIONS AND APPLICABILITY

We require employees and all persons doing business with QatarEnergy to comply with this Policy, applicable laws and regulations. Failure to do so may result in criminal and civil proceedings, possible damage claims, significant fines and/or possible imprisonment. QatarEnergy's reputation may also be damaged through adverse publicity or negative impact to our organizational goodwill.

We expect employees and all persons doing business with QatarEnergy to share the responsibility to not engage in any form of anti-competitive behaviour, discussions or activities that could lead to the appearance or allegation of improper behaviour. The QatarEnergy Legal Department should always be consulted if there is any doubt about the application and interpretation of any competition and/or anti-trust laws or any alleged behaviour that is in violation of this Policy.

Where this Policy sets higher standards than those required locally, the higher requirements of this Policy will apply. It is everyone's duty to speak up if they observe or suspect a violation of this Policy. We expect our majority-owned subsidiaries and joint ventures to comply with this Policy or create and adopt one of a similar nature. We will only work with those who share our standards of business conduct and values.

INTRODUCTION

Confidentiality of information is of great importance and contributes to QatarEnergy's success. We conduct business in compliance with the principles established in our Code of Conduct, our values, and the laws and regulations applicable in the countries where we operate. This Policy defines QatarEnergy's position and minimum compliance requirements for the protection of confidential information belonging to QatarEnergy and its business partners.

OUR COMMITMENTS

- We maintain the confidentiality of information belonging to QatarEnergy for competitive, security and other business purpose.
- Information belonging to third parties and made available to QatarEnergy for legitimate business purposes, is also protected and kept confidential.
- We comply with all applicable information security, competition and securities laws and regulations.

EXPECTATIONS AND APPLICABILITY

We require employees and all persons doing business with QatarEnergy to comply with this Policy and expect that:

- they do not disclose, or otherwise use, confidential information obtained in the course of employment or contractual engagement with QatarEnergy unless authorised to do so and to the extent strictly necessary to perform their duties
- these obligations remain in effect beyond termination of a QatarEnergy employment contract, contractual agreement or board appointment
- knowledge of confidential information about another party gained in the course of QatarEnergy work-related duties must be protected in the same manner as confidential information that relates to QatarEnergy's operations
- everyone shares the responsibility to protect QatarEnergy assets, intellectual property and commercial information efficiently and in order to advance the interests of the organization including information belonging to third parties but made available to QatarEnergy for legitimate business reasons
- supplementary steps must be taken to ensure that all information of a commercially and competitively sensitive nature is protected with access restricted to designated individuals and only disclosed on a need-to-know basis, and strictly to the extent required for the performance of relevant job duties
- unauthorized disclosure of confidential information, whether to internal or external parties, is strictly prohibited.

Where this Policy sets higher standards than those required locally, the higher requirements of this Policy will apply. It is everyone's duty to speak up if they observe or suspect a violation of this Policy. We expect our majority-owned subsidiaries and joint ventures to comply with this Policy or create and adopt one of a similar nature. We will only work with those who share our standards of business conduct and values.

INTRODUCTION

Qatar Energy pays careful attention to conflicts of interest. We conduct business in compliance with the principles established in our Code of Conduct, our values, and the laws and regulations applicable in the countries where we operate. This Policy defines Qatar Energy's position and minimum compliance requirements for our employees when dealing with potential, perceived or actual conflicts of interest.

OUR COMMITMENTS

- We are committed to the highest standards of ethical business conduct.
- We conduct business in a manner that ensures that personal interests do not interfere with the decision making, effective performance of our work or create unfair advantage to individuals.

EXPECTATIONS AND APPLICABILITY

- We require employees and all persons doing business with Qatar Energy to comply with this Policy including:
 - the avoidance of any conflict between personal interests and the interests of QatarEnergy
 - the performance of professional duties and business decisions being made in an objective, professional manner and with the organization's best interests in mind.
- Individuals must avoid situations, relationships, or activities where a conflict exists, has the potential to exist, or could be seen to exist.
- Conflicts of interest must be avoided by taking actions or making decisions to ensure that they do not occur.
- Individuals must not use their position with Qatar Energy, its corporate assets, or any information obtained through their employment or contractual relationship with Qatar Energy for personal gain.
- Everyone shares a responsibility for reviewing their own external business interests, personal interests, family and other close relationships, for potential, perceived or actual conflicts of interest with QatarEnergy and should take steps to disclose such conflicts prior to engaging in the conduct in question.
- All employees must ensure that conflicts of interest, actual, perceived, or potential, are disclosed in accordance with the relevant Qatar Energy conflicts of interest declaration procedure.
- Employees must remove (recuse) themselves from decisions where their judgment or the ability to act in Qatar Energy's best interests may be affected or be perceived to be affected.

Where this Policy sets higher standards than those required locally, the higher requirements of this Policy will apply. It is everyone's duty to speak up if they observe or suspect a violation of this Policy. We expect our majority-owned subsidiaries and joint ventures to comply with this Policy or create and adopt one of a similar nature. We will only work with those who share our standards of business conduct and values.

INTRODUCTION

Our reputation matters greatly to us. Honest, accessible and efficient communications with external stakeholders builds trust, contributes to our reputation and demonstrates that we are a responsible organization. We believe in openness, clarity of information and know that effective communication is an essential asset to our business success. We conduct business in compliance with the principles established in our Code of Conduct, our values, and the laws and regulations applicable in the countries where we operate. This Policy describes our commitments and expectations when communicating with others.

OUR COMMITMENTS

- We commit to high quality communications through all channels.
- We aim for all communications to be clear, honest and accurate.
- We commit to openness and transparency in all our communications.
- When QatarEnergy speaks publicly, it is with the consistent, single voice of the authorized spokespeople only.
- QatarEnergy is concerned about facts, seeks to validate information and does not comment on rumours.
- We commit to proactive and planned communications through appropriate channels that meet stakeholders' needs and promote relationship-building and trust:
 - based on mutual respect
 - based on active listening, acknowledging differing perspectives, interests and rights.
- QatarEnergy actively reviews communications opportunities, evaluating risks and benefits before taking action.
- We ensure that communications comply with all applicable laws and regulations, and are in line with pre-existing agreements with partners on disclosure.
- When using social media, we always strive to uphold our values and enhance our reputation.
- We provide relevant QatarEnergy employees with adequate resources and training in communications.

EXPECTATIONS AND APPLICABILITY

We require employees and all persons doing business with QatarEnergy to comply with this Policy.

- Everyone at QatarEnergy is responsible for protecting QatarEnergy's reputation.
- Externally, unless authorized to do so, employees and all persons doing business with QatarEnergy must not disclose QatarEnergy confidential information he or she holds as a result of his or her duties or as a consequence of belonging or working with the organization.
- Internally, employees and all persons doing business with QatarEnergy must not disclose confidential information to other employees not authorized to receive it.
- If employees and all persons doing business with QatarEnergy communicate personally on social media, they should make it clear that they do so in their own name, state that any opinions are their own and that they do not speak on behalf of QatarEnergy.
- Employees and all persons doing business with QatarEnergy must never comment negatively on social media in a way that may affect QatarEnergy's reputation.
- Employees should never record or make derogatory remarks, exaggerations or inappropriate characterizations of people, governing bodies or other entities doing business with QatarEnergy.

Where this Policy sets higher standards than those required locally, the higher requirements of this Policy will apply. It is everyone's duty to speak up if they observe or suspect a violation of this Policy. We expect our majority-owned subsidiaries and joint ventures to comply with this Policy or create and adopt one of a similar nature. We will only work with those who share our standards of business conduct and values.



INTRODUCTION

QatarEnergy regulatory compliance and administrative duties are a critical part of our ability to operate legitimately and successfully. We conduct our business in compliance with the principles established in our Code of Conduct, our values, and the laws and regulations applicable in the countries where we operate. This Policy defines QatarEnergy's position and minimum compliance requirements for our employees.

OUR COMMITMENTS

- We comply with all laws and regulations applicable to our operations and conduct those operations to the highest ethical business standards.
- We are committed to obtain and maintain all applicable licenses, permits and government authorizations when required under the applicable law.
- We always commit to maintain accurate accounts and records including:
 - the recording of transactions in a timely and complete manner
 - in enough detail such that the purpose and amount of the transaction is clear
 - with no false or misleading entries
 - in compliance with international financial reporting standards and generally accepted accounting practices.
- We comply with all laws and regulations relating to insider-trading.

EXPECTATIONS AND APPLICABILITY

We require employees and all persons doing business with QatarEnergy to comply with this policy. Failure to do so may have serious consequences and may result in criminal and civil proceedings, possible damage claims, significant fines and/or possible imprisonment. QatarEnergy's reputation may also be damaged through adverse publicity or negative impact to our organizational goodwill.

- Employees and all persons doing business with QatarEnergy should never use off-the-books or secret accounts with the intention of overriding or circumventing internal controls.
- Employees must never issue any documents which do not properly and fairly record the transactions to which they relate.
- QatarEnergy records must never be altered, falsified, hidden or disguised in order to alter the nature of the transaction.
- Employees and all persons doing business with QatarEnergy have a responsibility to retain all business records in accordance with this policy and applicable legal and regulatory requirements.
- Employees and all persons doing business with QatarEnergy should not use (or provide to others) confidential and/or non-public insider information with the aim of buying or selling stocks or other securities.
 - This includes information belonging to those doing business with QatarEnergy, its joint venture partners, subsidiaries, customers, suppliers and contractors, or entities in which QatarEnergy holds a participating interest, and any other third parties, where information provided to QatarEnergy in relation to a contractual arrangements, mergers, acquisition or divestment transaction-related activity, or in connection with other QatarEnergy's activities.
- Certain categories of employees cannot trade in shares or other securities in the companies with which QatarEnergy does business or holds participating interest due to the nature of their roles at QatarEnergy, its subsidiaries or joint ventures. These employees are included on QatarEnergy's Insider Trading List which outlines the scope of their applicable prohibitions in alignment with the role they fill within the QatarEnergy organization.

Where this Policy sets higher standards than those required locally, the higher requirements of this Policy will apply. It is everyone's duty to speak up if they observe or suspect a violation of this Policy. We expect our majority-owned subsidiaries and joint ventures to comply with this Policy or create and adopt one of a similar nature. We will only work with those who share our standards of business conduct and values.

INTRODUCTION

Trade Compliance is critical to our ability to operate successfully in Qatar and around the world. We conduct business in compliance with the principles established in our Code of Conduct, our values, and the laws and regulations applicable in the countries where we operate. The purpose of this Policy is to define QatarEnergy's position and minimum trade compliance requirements in Qatar and internationally.

OUR COMMITMENTS

We are committed to the highest standard of ethical business conduct and to comply with all applicable trade compliance laws and regulations.

EXPECTATIONS AND APPLICABILITY

We require employees and all persons doing business with QatarEnergy to comply with this Policy, applicable laws and regulations. Failure to do so may have serious consequences and may result in criminal and civil proceedings, possible damage claims, significant fines and/or possible imprisonment. QatarEnergy's reputation may also be damaged through adverse publicity or negative impact to our organizational goodwill.

- Employees and all persons doing business with QatarEnergy who are responsible for the transfer or movement of products, goods, services or technologies across international borders and in connection with QatarEnergy's activities, must ensure that they and their teams understand and comply with all relevant trade compliance laws and regulations, including domestic and international customs regulations, sanction regimes, trade and import and/or export control laws and regulations. If in doubt, legal assistance must be sought.

Where this Policy sets higher standards than those required locally, the higher requirements of this Policy will apply. It is everyone's duty to speak up if they observe or suspect a violation of this Policy. We expect our majority-owned subsidiaries and joint ventures to comply with this Policy or create and adopt one of a similar nature. We will only work with those who share our standards of business conduct and values.



Climate Change Policy
Environment Policy
Stakeholder Engagement Policy
Sustainability Policy



INTRODUCTION

QatarEnergy considers climate change as one of the most critical issues of our times, requiring prompt and dedicated action at a global scale. As a responsible steward of Qatar's valuable resources, and guided by our values, we recognize the need to play a major role in the global journey to address climate change by providing clean, accessible, and affordable energy in the most responsible way. We conduct business in compliance with the principles established in our Code of Conduct, our values, and the laws and regulations applicable in the countries where we operate. This Policy sets out the principles that will inform our approach, defines our minimum compliance requirements, and outlines our commitments to all stakeholders – employees, partners, local communities and the world at large – as well as identifying the actions that we are taking to build resilience as an organization in the face of climate change. It is aligned to our Sustainability and Environment Policies and supports the goals of the Paris Agreement.

OUR COMMITMENTS

QatarEnergy is an active player in the global ambition for net zero emissions. We commit to displacing high greenhouse gas-emitting fossil fuel energy with cleaner gas and assisting in the development of low carbon solutions, thereby helping to accelerate decarbonization.

- We further develop our Climate Roadmap, commitments and actions through our 4Cs framework:
 - Consolidate our leadership position by growing our LNG capacity as a destination fuel to provide cleaner energy in response to increasing global energy demand
 - Curb emissions from all operations through reduction and energy efficiency targets
 - Create low carbon solutions by growing renewable energy capacity
 - Compensate residual emissions through wide deployment of carbon capture and sequestration (CCS) technology at our facilities and new support for sustainable innovations.
- We integrate Climate Change in our strategic and operational decision making supported by strong governance and continual strengthening of processes at QatarEnergy to enhance resilience to these risks.
- Our leadership and senior management are committed to establishing governance processes for sustainability and climate change objective setting, action plans and practices.
- We foster a culture of energy and carbon savings by promoting our Climate Change Strategy and Policy to employees and business partners.
- We work with industry and regulatory authorities to develop and implement efficient, effective and equitable climate change policies and regulations that support energy security and reliability.
- We take a collaborative approach to developing and implementing solutions with stakeholders, working alongside other players in the energy sector both in Qatar and internationally.
- We establish methods to account for GHG emissions along our value chains with partners towards agreed common goals.
- We engage in a continuous process of stakeholder dialogue.
- QatarEnergy is committed to transparency and to regularly report on its efforts to mitigate its emissions and to meet its targets.

EXPECTATIONS AND APPLICABILITY

Climate change is a shared challenge. It will require the combined efforts of all stakeholders to achieve decarbonization. Employees and all persons doing business with QatarEnergy must play a role through our processes, core decision making and visible actions.

It is everyone's duty to speak up if they observe or suspect a violation of this Policy. We expect our majority-owned subsidiaries and joint ventures to comply with this Policy or create and adopt one of a similar nature. We will only work with those who share our standards of business conduct and values.



INTRODUCTION

Respect and protection of the environment are central to our business activities. As a responsible steward of Qatar's natural resources, we balance economic and environmental responsibilities, and we work to protect our ecosystems for current and future generations. We conduct business in compliance with the principles established in our Code of Conduct, our values, and the laws and regulations applicable in the countries where we operate. The purpose of this Policy is to set out our commitments and to define our minimum compliance requirements for the environment when considering our employees, partners and all external stakeholders. It is aligned to our Climate Change and Sustainability Policies.

OUR COMMITMENTS

- We are committed to the protection of the environment and prevention of pollution through:
 - Biodiversity: Protection, mitigation and investment approaches to minimize impact on biodiversity
 - Water: Develop solutions to conserve freshwater resources and restore ecological balance in marine environments to protect these essential resources
 - Waste: Reduce waste generation, including reuse and recycle initiatives, and improve waste management throughout the life cycle of our processes as we work to develop our Circular Economy strategy
 - Air quality: Improve local air quality by reducing emissions and continue to act on issues of climate change.
- We comply with all applicable environmental laws and regulations and will set a high standard when these do not exist.
- We integrate environmental protection in our Management System.
- We rely on rigorous processes to prevent leaks and spills and manage potential impacts on water or land.
- We assess and manage risks and potential impacts of our operations on biodiversity, water and air quality.
- We continuously work to mitigate or eliminate risks to the environment, but If an incident occurs, we conduct a rapid, comprehensive response to minimize impact on communities and the environment.
- We conduct environmental due diligence in our supply chain and encourage contractors and suppliers to commit to the prevention of pollution and protection of the environment.
- We conduct and support research to improve understanding of our impacts and methods of environmental protection, and to enhance our operational compatibility with the environment.
- We work with local communities and governments to monitor and manage environmental impacts.
- We establish partnerships to enhance learning and continuous improvement of our processes and technology.
- We raise awareness on environmental issues and train employees to help to protect the environment.
- We commit to the continual improvement of our environmental management system to enhance our environmental and pollution control performance.
- We commit to set targets, assess and monitor environmental impacts and performance, and regularly report via our annual Sustainability Report.

EXPECTATIONS AND APPLICABILITY

Employees and all persons doing business with QatarEnergy share responsibility to build a culture of respect and protection of our environment. We have a duty to speak up and report actual or suspected infringements of this Policy, or intervene if required.

All relevant QatarEnergy managers recognize environmental responsibilities and strive to minimize or mitigate impacts, and are expected to:

- set objectives, targets and monitor progress against this Policy
- implement procedures, guidelines and plans
- routinely inspect and report on systems, processes and performance
- provide comprehensive response to protect people and the environment should an incident occur.

Where this Policy sets higher standards than those required locally, the higher requirements of this Policy will apply. It is everyone's duty to speak up if they observe or suspect a violation of this Policy. We expect our majority-owned subsidiaries and joint ventures to comply with this Policy or create and adopt one of a similar nature. We will only work with those who share our standards of business conduct and values.



INTRODUCTION

Respectful, effective engagement with all stakeholders is an essential part of being a responsible company and is fundamental to the success of our operations and the projects in which we are involved. We conduct our business in compliance with the principles established in our Code of Conduct, our values, and the laws and regulations applicable in the countries where we operate. We aim to create trust-based relationships by engaging with our people, business partners, governments, civil society, educational institutions and local communities. This Policy describes our commitment to engaging with these stakeholders, communicates our expectations and defines minimum compliance requirements.

OUR COMMITMENTS

As a responsible steward of natural resources, we engage with stakeholders proactively and with respect in order to foster mutual understanding, trust and cooperation.

- We meet with government representatives to provide information and understanding of our projects and policies.
- We participate in multi-stakeholder initiatives and conferences to exchange views, information and expertise, and to enable progress on key policy issues.
- We consult with communities and encourage participation in meaningful discussions.
- We aim to create shared value and prevent negative impacts.
- We strive to resolve disputes through open dialogue.
- We undertake initiatives that reflect community priorities in partnership with other stakeholders.
- We seek community support of our activities with respect for local cultural processes and traditions.
- We foster dialogue with suppliers and business partners.
- We commit to a responsible purchasing policy in order to raise the level of collective excellence.
- We maintain long-term partnerships with educational institutions and engage in constructive dialogue and support.
- We consult broadly with employees and/or their appropriate representatives to capture views, ideas, expectations and concerns according to local laws and practices.
- We promote the knowledge and respect for the commitments in this Policy and commit to monitor and report on our stakeholder engagement performance as per the International Finance Corporation Standards.

EXPECTATIONS AND APPLICABILITY

We require employees and all persons doing business with QatarEnergy to comply with this Policy.

All relevant QatarEnergy managers recognize their stakeholder engagement responsibilities and are expected to:

- set objectives, plans, targets and monitor progress against this Policy
- implement stakeholder engagement plans / social performance plans and routinely inspect and report on these plans.

Where this Policy sets higher standards than those required locally, the higher requirements of this Policy will apply. It is everyone's duty to speak up if they observe or suspect a violation of this Policy. We expect our majority-owned subsidiaries and joint ventures to comply with this Policy or create and adopt one of a similar nature. We will only work with those who share our standards of business conduct and values.



INTRODUCTION

QatarEnergy is a safe, efficient, responsible and profitable business. Sustainable development allows us to meet the needs of stakeholders while managing economic, environmental and social performance. This helps us to achieve business success, creating value for the shared benefit of future generations and in support of the UN Sustainable Development Goals and Qatar National Vision 2030.

We conduct our business in compliance with the principles established in our Code of Conduct, our values, and the laws and regulations applicable in the countries where we operate. This Policy considers our employees, partners, local communities and society in general. It describes our ambitions and defines our minimum compliance requirements. It is aligned to our Climate Change, Environment, Stakeholder Relations and other policies, and our belief that social and environmental performance is essential in a low carbon world.

OUR COMMITMENTS

- We commit to visible and accountable leadership driving sustainable development.
- We integrate sustainable development into core planning and business management processes throughout the life cycle of all activities and in line with the QatarEnergy strategy.
- We regularly monitor and report of our performance in line with GRI Standards.
- We comply with applicable laws and regulations, including for human rights and the environment, and we encourage others to comply with our higher standards.
- We provide the right resources, processes, training and communication to ensure understanding, competence and the skills to manage QatarEnergy sustainably.
- We support wellbeing and an inclusive workforce in all operations.
- We commit to target energy efficiency, reduce our carbon footprint, innovate and combat the effects of climate change as per the Paris Climate agreement.
- We conduct ongoing consultation and collaboration with local communities and other stakeholders to understand priorities and to inform our actions.
- We choose sustainable investment practices that maximize value to QatarEnergy and the people of Qatar.
- We deliver social and economic benefit and shared value to the communities in which we operate.
- We support local value chains, build and maintain mutually beneficial relationships.
- We develop initiatives that play a positive role in local communities and contribute to social change.

EXPECTATIONS AND APPLICABILITY

Employees and all persons doing business with QatarEnergy are responsible for sustainability, demonstrated through processes, core decision making and visible actions.

All relevant QatarEnergy managers recognize their responsibility for sustainability and are expected to:

- set objectives, targets, monitor and report progress against agreed sustainability KPIs
- proactively manage and assess the economic, social and environmental risks, impacts and performance against agreed KPIs
- engage with external stakeholders honestly, transparently and with respect.

Where this Policy sets higher standards than those required locally, the higher requirements of this Policy will apply. It is everyone's duty to speak up if they observe or suspect a violation of this Policy. We expect our majority-owned subsidiaries and joint ventures to comply with this Policy or create and adopt one of a similar nature. We will only work with those who share our standards of business conduct and values.



Speaking Up Policy



INTRODUCTION

At QatarEnergy, we are committed to the highest standard of ethical business conduct. Our success depends on everyone sharing in that commitment and proactively identifying and addressing concerns and acts of potential wrongdoing. We conduct our business in compliance with the principles established in our Code of Conduct, our values, and the laws and regulations applicable in the countries where we operate. This Policy defines our minimum compliance requirements and confirms our expectation that all employees have a responsibility and are expected to report any actual or suspected breaches of the Code of Conduct, QatarEnergy policies and/or applicable laws and regulations.

OUR COMMITMENTS

- We build and maintain a working culture where speaking up is accepted and encouraged.
- We provide an easily accessible, confidential Speaking Up Line and other reporting mechanisms which we invite all employees and QatarEnergy stakeholders to utilize.
- We follow up on all reports made in accordance with this Policy in a confidential, timely and professional manner.
- We commit, to the best of our ability, to protect and keep confidential, the identity of anyone who raises a concern.
- QatarEnergy does not accept any form of retaliation, reprisal or victimization against anyone who raises a concern in good faith.

EXPECTATIONS AND APPLICABILITY

We require employees and all persons doing business with QatarEnergy to comply with this Policy.

- We invite all concerns to be raised using our Speaking Up Line or other reporting channels.
- Reports can be made anonymously using any of the speaking up reporting channels.
- We encourage reporters to identify themselves when bringing concerns to our attention as this allows for a more effective and timely investigation.
- The Speaking Up Line and other related reporting channels should never be used to report events that present an immediate threat to life or property as they will not receive an immediate response.

Where this Policy sets higher standards than those required locally, the higher requirements of this Policy will apply. This Policy is open to all employees, persons doing business with QatarEnergy and other interested stakeholders. Should any of them wish to raise a concern regarding QatarEnergy's business practices, QatarEnergy invites them to do so in accordance with this Policy. It is our employees duty to speak up if they observe or suspect a violation of this or other QatarEnergy policies. We expect our majority-owned subsidiaries and joint ventures to comply with this Policy or create and adopt one of a similar nature. We will only work with those who share our standards of business conduct and values.