



قطر للطاقة  
QatarEnergy

# Shaping who we are

## Code of Conduct

May 2022



## President and CEO's Message

QatarEnergy is proud of the leading role we play in the energy sector. With strong roots in Qatar, we have a strong international presence and are resolved to achieve our goals in a responsible manner. We are proud of the strength of our business processes and corporate governance practices. Our Code and supporting policies are fundamental to our success and we attach the utmost importance to operating in compliance with them.

This Code of Conduct reflects our values, outlines our expectations for ethical behavior and helps to support a strong collaborative culture of integrity and trust. It sets out how we do business and it defines how each of us must act to ensure that we achieve our business strategy, while continuing to grow and prosper as an organization. We expect everyone to understand, adopt and model the behaviors outlined in our Code. We expect this to be done while maintaining the trust, support and respect we have for each other.

In today's global environment, we must all do our part to help the world to transition to a low carbon future. As a leading LNG organization, QatarEnergy provides a solution for cleaner energy and acts as a transition partner in this journey. We are committed to the sustainability agenda, and always act in a principled and legally compliant manner. This is critical to our success.

Compliance with the expectations and responsibilities outlined in our Code is not optional. We expect our employees and business partners to comply with it. We also expect them to speak up if they witness or suspect behavior that is incompatible with our standards and policies and the spirit in which they are intended. By committing ourselves to our Code, we exemplify the finest aspects of our heritage and establish ourselves as a leader in the global business community.

I thank you for your commitment as together we work towards being recognized as an organization of integrity, and one where ethical business practices are the norm and never the exception.

**Saad Sherida Al-Kaabi**

President and CEO, QatarEnergy





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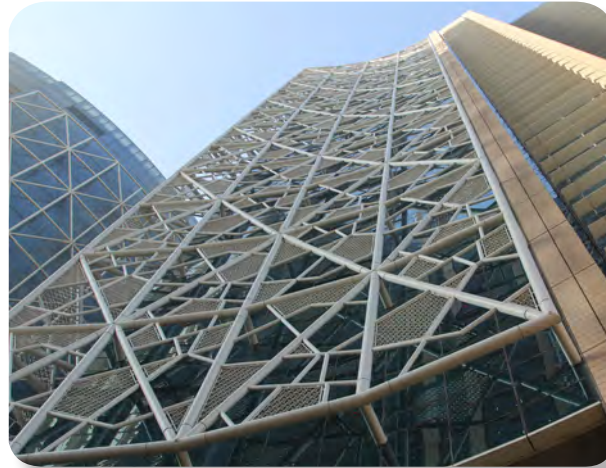
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## OUR SHARED COMMITMENT

QatarEnergy supports the State of Qatar's National Vision 2030 of balancing the accomplishments that achieve economic growth with the human and resource needs of the people of Qatar. We strive to deliver positive economic, social and environmental influence and make an ongoing contribution to society, to the development of the people of Qatar and the enhancement of the country's international reputation. We recognize the challenges of climate change and are a key player in the world's transition to cleaner energy. Wise management of Qatar's natural resources will help to sustain prosperity while ensuring that future generations will inherit ample means to meet their personal aspirations.

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. This Code of Conduct (our Code) describes our commitment to those standards and aligns with our values. It is supported by policies and procedures that explain how we should act in line with the principles outlined in our Code and is further overseen by our Business Conduct Committee which is made up of members of our senior leadership team.

Our Code is an important guide for everyone at QatarEnergy and is proof of our commitment to ethical behavior and sustainable business practices. It should be used to help us make informed decisions and to assist in living our values. It should be adopted as a guide to behavior and to help us be truly successful as individuals and as an organization - for ourselves, our country and our future.





## Following Our Code

Our Code sets out the behaviors and the standards of conduct we expect. Anyone who works for or represents QatarEnergy or its wholly-owned subsidiaries must understand and comply with these standards, including our directors, officers, employees and secondees (our people). We expect agents or intermediaries acting on our behalf to also comply with our Code.

We expect our majority-owned subsidiaries and joint ventures to adopt standards of behavior that conform to our own, either by accepting our Code or creating and adopting one of a similar nature.

We only work with consultants, contractors, suppliers, vendors, joint venture partners and other stakeholders (our business partners) who share our standards of business conduct and values.

Where the standards that we have set in our Code or in our policies and procedures are higher than those required under local laws, rules, customs or norms, we always follow our own higher standards.



## Our Values

Our values underpin everything we do and help to direct how we do it.

They reflect what we stand for and guide the decisions we make and the actions we take.

### Safety



We care for our people and see safety as a priority for everyone. We are committed to an incident-free, secure, safe and healthy environment for our employees, stakeholders, partners and communities where we operate.

### Integrity



We place the highest importance on honesty and ethical behavior, always choosing to do the right thing. We value transparency in our dealings with each other and stakeholders. Through this we build strong and successful relationships. We believe results matter, but how we achieve those results also matters.

### Excellence



We continually improve our processes to achieve greater efficiency, productivity and higher performance. We generate and are open to new ideas. We learn from both our successes and mistakes. Each of us is accountable for the quality, efficiency and effectiveness of our work.

### Respect



We respect our colleagues, stakeholders, partners and communities and act with care and consideration to build trusting relationships. We value our diversity and each individual's contribution.

### Collaboration



We communicate across all areas and levels, sharing information and considering diverse viewpoints to achieve our common goals. We empower others, build ownership, create accountability and enhance cooperation. We recognize and appreciate those who work across teams and groups to achieve QatarEnergy's vision and strategy.

### Responsibility



We are committed to operating in a socially responsible manner, caring for the environment and the communities we impact, and our employees. We manage our people and assets responsibly, serving as a catalyst for growth to ensure the prosperity of future generations. We develop everyone for the benefit of QatarEnergy and the country with a special emphasis on the capabilities of Qataris.



## Upholding Our Standards

### Our Responsibilities

We are all accountable for upholding our values and adhering to the standards as described in our Code and its related policies and procedures.

The principles contained in our Code are essential ingredients for the way we do business, regardless of who we are or where we work. We must comply with our Code, both its letter and spirit, every day, all the time.

We are all responsible for reading and making a personal commitment to implementing our Code's standards in all of our actions and in all of our business activities. We should be confident that we have the support of the Board, our President and CEO, and all of our senior leadership team as we work together to live by the values and standards we have set for ourselves.

### Our Expectations

**Our Code contains specific guidance on how we expect our people to behave and our expectations on standards of appropriate conduct. We expect everyone to understand our Code and act accordingly.**

**We expect our people to pay due respect to the traditions of the State of Qatar, comply with any rules and regulations issued by its authorities, and observe its general customs and traditions.**

**We expect our people to maintain the dignity of their job in accordance with the general customs of the State of Qatar and conduct themselves with respect both inside and outside the workplace.**



## Our People

We all have a responsibility to live by our Code, promote it and ensure we conduct ourselves in accordance with it.

Specifically, we will:

- read and understand our Code and work in accordance with it
- keep up to date with any changes in our policies or procedures
- seek advice if we are unsure of any aspects of our Code or policies
- ensure that our business partners are aware of our standards
- use good judgment when representing QatarEnergy and acting on its behalf
- speak up, ask questions and raise concerns if you believe that our Code has been breached.

## Our Leaders

As a leader, we have the added responsibility to help others understand and deliver ethical behavior at all times.

Specifically, we will:

- lead by example and live by our Code
- foster a culture of integrity and trust
- ensure that our Code is accessible and understood by those for whom we are responsible
- be open and respond to questions and assist in finding solutions when issues are raised
- be accountable for those we lead and take responsibility for their decisions and actions
- protect and never retaliate against anyone who raises good faith concerns about a breach in our Code.





## Our Practices

The provisions in our Code are supported by our policies and procedures and we will provide training as appropriate. Our people are required to complete an annual review of our Code and policies and acknowledge their compliance with them. We also require them to disclose any potential or actual conflicts of interest between their personal affairs and those of QatarEnergy.

We take compliance with our Code seriously. Conduct contrary to these requirements, our values and the spirit and intention of our Code is a serious breach of our standards. If we intentionally or unintentionally violate our Code or policies, we could be subject to disciplinary action, including termination of employment. QatarEnergy has adopted progressive accountability guidelines as a fair and consistent system for assessing the actions of individuals with regards to our standards and policies.

If we violate domestic or foreign laws, we could also face personal civil or criminal liability.



**Refer to our *Disciplinary Procedure and QatarEnergy Policies and Procedures Manual* for further information.**

## How to Deal with Concerns

We have high expectations of ourselves and our business partners and are open to questions or concerns as and when they are raised. We rely on our people and we all share the role of ensuring that our Code is recognized, understood and adhered to. We invite people to speak up and let us know if there are any concerns regarding business practices or their alignment with our commitments as outlined in our Code and related policies.

There may be times when we are not sure how to respond or may witness an act of potential wrongdoing, one that may be incompatible with our Code. In such circumstances, we have a duty to share and report our concerns in accordance with the provisions set out in the Speaking Up Section of our Code (Section 5). In exercising this duty, we should act without fear of reprimand or disciplinary action.

**We comply with the applicable laws and regulations in all of our operating jurisdictions. We expect our people to have sufficient knowledge of these laws in order to identify potential risks and to know when to seek advice and speak up regarding concerns pertaining to them.**



# 2

## WORKING TOGETHER

### Our People

People are our most important asset. Our success depends on their talents and commitment to QatarEnergy, and the best application of their skills and expertise. At QatarEnergy, we are committed to the development of all of our people and to rewarding them based on performance. All decisions regarding hiring, retention and promotion are made objectively and are based on merit.

We support and coach our people in developing their skills and careers and provide them with the necessary training and tools, including constructive feedback on performance and behavior. We celebrate success and give credit. We recognize those whose behavior shows commitment to our values. We evaluate and compensate performance on the basis of how objectives are met as well as how they are delivered.

We value the unique contribution of each person at QatarEnergy and we recognize that we can accomplish more by bringing together people from different backgrounds and with different talents and ideas to work together in an inclusive and respectful environment.

Everyone at QatarEnergy is entitled to fair treatment, courtesy and respect.



## Respectful Workplace

Our success depends upon a workplace culture of fairness and mutual respect. We value all employees and offer opportunities for people to develop and progress according to merit, and their contribution. We are committed to fair and respectful treatment and do not tolerate discrimination or harassment of any kind.

## Harassment

Harassment is a form of discrimination and usually refers to a wide range of behaviors of an offensive or unwelcome nature. It involves unwanted physical or verbal behavior that offends or humiliates a person.

We are committed to a workplace that is free of harassment and discrimination. We do not tolerate bullying or exploitation of positions of power. We consider harassment a serious form of discrimination where unwanted physical or verbal behavior offends or humiliates a person.

We take care to ensure that our workplace is free from intimidation or unreasonable interference in a person's employment or progression opportunities. We will not tolerate any derogatory, sexual, racial or discriminatory remarks, statements or materials at QatarEnergy.

Examples of **harassment** include:

- a person who creates an intimidating, hostile or offensive work environment
- unwelcome verbal or physical advances or propositions
- sexual, racial or otherwise derogatory or discriminatory materials, statements or remarks
- unreasonable interference with an employee's work performance or employment opportunities.



*Refer to our Respectful Workplace Policy for further information.*



## Delivering a Safe Workplace

Our intention is that everyone goes home safely from all QatarEnergy work locations. We strive towards an incident-free, secure, safe and healthy workplace. Our aim is that all of our operations are conducted in compliance with QatarEnergy standards and applicable health and safety laws and regulations.

In order to meet our objectives, everyone should be aware of our safety standards and abide by them. Safety is about more than just following rules – we all need to be alert to safety risks as we go about our jobs and we expect our people to be guardians of safety even if that means stopping work when they believe it is unsafe. All safety and security concerns and incidents should be reported to managers and health and safety representatives.

To support a safe and secure work place, each of us is responsible for ensuring and maintaining our fitness for work. We commit to being in a condition that allows us to carry out our duties,



both physically and behaviorally, in a safe manner so that we keep ourselves and others safe. This means that we are free from alcohol, drugs or any other substance that impairs our ability to perform our job, or that may have an adverse effect on the safety and security of others.

**We do not allow the use, possession, distribution, and/or sale of illicit drugs or alcohol during QatarEnergy business hours, on our premises, at official sponsored events, or in any way that violates the law. The State of Qatar prohibits the use of alcohol and drugs and there are serious consequences for violating its laws.**



**Refer to our *Occupational Health and Safety Policy* for further information.**





## Privacy

We respect the privacy of our people and commit to acting responsibly when collecting, processing, retaining, disclosing and disposing of their personal information. We aim to maintain the accuracy, confidentiality and security of this information and will only share it with authorized individuals and for legitimate business purposes and, where appropriate, with the permission and/or knowledge of the individual.



*Refer to our Privacy of Personal Information Policy for further information.*



## Human Rights

QatarEnergy respects and upholds international standards on human rights and does not engage in any conduct that hinders or interferes with those rights. Our respect for human rights is inspired by the Universal Declaration of Human Rights and guided by the constitution of Qatar.

We avoid infringing on the human rights of others and endeavor to address adverse impacts, which could be associated with part of our operations. We believe in treating all people with respect and will protect those working in our operations either directly or through third party sub-contractors.

We respect the human rights of people in communities impacted by our activities, including in relation to their use of land, water and other natural resources.

Our human rights commitment means that we will not engage, tolerate or work with business partners:

- that employ children and minors
- that engage in human trafficking or forced, bonded or compulsory labour
- whose employees are not free to leave their employment after reasonable notice or are required to lodge deposits of money or identity papers with their employer, unless required to do so in accordance with the law.



*Refer to our Human Rights Policy for further information.*



# 3

## HOW WE DO BUSINESS

### Our Practices

QatarEnergy is committed to conducting its business in an ethical manner and one in which our business practices align with our organizational values. Our success depends on ensuring that these practices are in alignment with our Code of Conduct and our policies, and that how we do business is as important as the results we achieve.

### Our Place in the World

No organization operates in isolation. The way we do business will always have an impact on our stakeholders inside and outside of QatarEnergy. We recognize that we can make a positive impact to the State of Qatar, its economy, social development and environment. As an important international energy company, we also have an impact and responsibility to the world around us and to future generations.

We are committed to acting in an ethical, safe and socially responsible manner. We have developed policies, practices and procedures that help to ensure that the way we do business is in alignment with our values and standards for business conduct.



*Refer to our Sustainability Policy for further information.*



## Conflicts of Interest

A conflict of interest is a situation in which competing interests may affect our ability to make unbiased and objective decisions on behalf of QatarEnergy. This includes personal interests that conflict with work-related responsibilities and may include personal relationships, external activities or involvement with other business ventures that could influence, or be thought to influence, a person's decision-making abilities.

An actual or perceived conflict of interest can affect an individual's or QatarEnergy's reputation. It is therefore important that we disclose them in a transparent and timely manner.

We are committed to avoiding conflicts of interest wherever possible and managing conflicts of interest in a transparent and ethical way.



*Refer to our Conflicts of Interest Policy and supporting procedures for further information.*

## Our Responsibilities

- **Decisions made at or for QatarEnergy should not be influenced by personal considerations.**
- **Always disclose any actual, potential or perceived conflicts of interest on a real-time basis, even if it is thought they they will not influence decision-making.**
- **If unsure if a conflict of interest exists, consult a line manager or member of QatarEnergy's Legal or Internal Audit departments.**
- **Withdraw from any decision-making activities that could create an actual, potential or perceived conflict of interest.**
- **All employees must acknowledge that all conflicts of interest have been disclosed in accordance with the Conflicts of Interest Policy and supporting procedures on an annual basis.**





## Preventing Bribery and Corruption

At QatarEnergy, we have zero tolerance for any form of bribery or corruption. We work proactively to ensure that corruption does not occur anywhere within our operations and comply with all applicable anti-bribery and corruption laws and international conventions.

As part of this commitment, the direct or indirect offer, payment, solicitation or acceptance of bribes in any form is strictly prohibited. This includes the giving or receiving of an improper advantage through undue influence, preferential treatment or any form of illegal payment.

We prohibit the making of payments to public officials. This likewise includes the making of facilitation payments.

We take additional care when doing business in countries known to have high levels of corruption and ensure that we know and trust our business partners, agents and intermediaries.



*Refer to our Anti-Bribery and Corruption Policy for further information.*

**A facilitation payment** is a type of bribe. It is usually of a relatively small size, designed to secure or speed up the performance of a routine government action to which the payer is legally entitled.

Examples include, but are not limited to:

- the processing of custom duties or freight forwarding
- the timely advancement of government inspections
- the issuance of cargo or customs clearance certificates
- the procurement of services such as power, phone or other utilities
- the issuance of visas, work permits or licenses
- other routine government decisions or transactions.

**The making of facilitation payments is prohibited.**

**A bribe** can take the form of money, goods, services or anything else of value, including:

- gifts and gift cards
- hospitality
- donations and sponsorships
- kickbacks and/or commissions
- travel or reimbursement of costs
- employment opportunities and internships
- education
- any other favors intended to unduly influence a decision.



## Gifts and Entertainment

We do business with organizations and people from many cultures and recognize that building business relationships may sometimes involve the exchange of incidental gifts, hospitality and entertainment. We are committed to acting fairly and being seen to act fairly at all times. We only exchange hospitality and entertainment where there is a clear business reason to do so and when the costs involved are reasonable and appropriate for the circumstances.

It is important that such exchanges are not, and are not open to being seen as, bribes or facilitation payments, and that they are never linked to an expectation of advantage or obligation on either side. Our procedures provide detailed guidelines on the giving and receiving of gifts and entertainment and recognize that some types of gifts and entertainment, such as cash, are never acceptable.

**As a rule, we do not exchange gifts or entertainment, except for promotional items or hospitality whose value is below QAR 500. Some exceptions are allowed but only when they have been disclosed to and authorized by senior management. This amount is per person per event (or the equivalent amount in a local currency).**

## Things to Remember

- **Never accept payment for personal expenses, including travel, accommodation or other associated expenses.**
- **Never allow family members to accept an offer for travel reimbursement or subsidy.**
- **Always obtain authorization from senior management before paying any expenses for others.**
- **Never exchange gifts or hospitality with business partners, agents or government (public) officials during an open bid process.**
- **In situations where it would clearly give offense to refuse a gift or hospitality, it may be accepted as long as it is provided to a member of the QatarEnergy senior management team who will deal with it in accordance with the Conflicts of Interest Procedures.**

**Gifts and entertainment** includes exchanges of goods, services, hospitality and any other things of value. Examples include exchanges involving product or service discounts, loans, favorable terms on products and services, prizes, transportation, use of vacation facilities, tickets to sporting or cultural events, stocks or securities, gift certificates or gift cards, meals, accommodation and other forms of entertainment and hospitality.

These items should only ever be exchanged where there is no expectation of advantage or obligation on both sides and only when the value is below QAR 500 (or the equivalent local currency amount).



## Confidential Information

Information is one of our most important assets. All information relevant to our operations, including that received from third parties, including our subsidiaries, joint ventures and business partners, should be protected at all times, no matter what form it appears in or how it was received.

We always communicate in an honest and open manner and encourage collaboration and the sharing of information, but reiterate the importance of appropriately handling confidential information. We all have a role to play in maintaining the confidentiality of information.

Disclosure of confidential information should only be done on a need-to-know basis, for legitimate purposes and only when duly authorized in accordance with our policies and procedures.



*Refer to our Confidential Information Policy and Information Classification Standard for further information.*

**Please adhere to the following principles when dealing with information:**

- **limit disclosure only to those with authorized access and on a need-to-know basis**
- **never use our information for personal benefit or profit**
- **classify all information in accordance with QatarEnergy's Information Classification Standard**
- **do not use information in a way that could be detrimental to the welfare, interest or reputation of the organization**
- **never remove confidential information from QatarEnergy premises without prior approval**
- **take all possible security measures when reviewing information electronically**
- **never leave confidential information unattended or unlocked**
- **seek authorization to copy confidential information**
- **dispose of documents appropriately, in line with their confidential classification**
- **all information remains the property of QatarEnergy and should be returned upon completion of employment or a contractual relationship**
- **never discuss or exchange confidential information using social media platforms.**

**Confidential Information** refers to non-public materials pertaining to QatarEnergy's operations, directly or indirectly obtained, disclosed or provided to, by or on behalf of the organization, in any format and irrespective of the media in which it was contained, acquired or produced.



## External Communication and Social Media

QatarEnergy is well known and respected in Qatar and around the world. The organization's reputation is an important asset and it is everyone's responsibility to protect it. Unauthorized disclosure of information, both ours and that belonging to our joint ventures, subsidiaries and business partners, can damage our reputation, cause financial harm or result in disciplinary action and civil or criminal legal liability.

We have a number of trained and authorized individuals who are responsible for communications to external audiences, through news releases, media interviews, social media, industry forums and interviews. Only these authorized people should speak publicly about the organization. It is important that all media enquiries are directed to our Public Relations Department.

We do not use social media to represent QatarEnergy or to release information. It is important to understand that we never negatively comment about QatarEnergy on public domains such as Twitter, Facebook, LinkedIn or other social media platforms.

**The reputation of QatarEnergy is an important asset and we are all responsible for protecting it.**



**Refer to our External Communication and Disclosure Policy for further information.**





## Protecting Our Assets

Protecting QatarEnergy's assets is a shared responsibility and we must exercise care when using them. They should be managed responsibly and we must take steps to protect them against damage, theft or unauthorized use. We are also committed to respecting assets owned by others and to avoiding their misuse or abuse.

**Our assets may take many forms: material, electronic, financial and intellectual. Our intellectual property, including trade secrets, trademarks, patents and copyrighted materials, are valuable and we are committed to protecting them.**



*Refer to our Asset Protection Policy for further information.*

## Use of IT and other Electronic Assets

QatarEnergy's information technology systems and other electronic assets are considered the property of the organization. We reserve the right to monitor them, block access to inappropriate websites and intercept messages or files transmitted by or stored on them.

Information technology systems and other electronic assets (such as laptops, mobile phones, tablets and QatarEnergy networks) must be used in accordance with our policies and procedures. This includes using them for legitimate business purposes only. We never use them to download or distribute inappropriate, offensive or illegal materials, and we protect them against potential cyber risks.

While occasional personal use of our IT systems is permissible, this should never interfere with our work.



*Refer to our IT Policies and Procedures for further information.*



## Permits and Licenses

We operate in compliance with all applicable laws and regulations related to our business activities wherever we do business. All applicable licenses, permits and government authorizations should be obtained and maintained if and when required under the applicable law. We expect our people and business partners to perform their duties in compliance with these laws and to consult with our legal team as necessary.



*Refer to our Asset Protection and Regulatory Compliance Policies for further information.*



## Accurate Books and Records

As part of our commitment to integrity and transparency, we ensure that our business records accurately and completely reflect our business transactions, including our asset acquisitions and dispositions.

We comply with professional accounting and financial reporting standards and never record false, misleading or incomplete information.

We never utilize off-the-book or secret accounts, override internal controls or issue documents that do not properly reflect the transactions to which they relate. We likewise never destroy or withhold records in response to or in anticipation of an investigation or audit.

Any concerns about accounting, purchasing or auditing irregularities, including circumvention or non-compliance with our internal controls, must be brought to the attention of our internal audit team.



**Business records** may be in any format and include:

- contracts
- purchase orders
- receipts
- communications with joint ventures, business partners and agents
- bid submissions, estimates
- meeting minutes and agendas
- internal and external presentations
- e-mails and related attachments
- policies and procedures.



*Refer to our Regulatory Compliance Policy for further information.*



## Fraud

Fraud is an act of deliberate misrepresentation, deception or violation of trust. It usually involves activities such as obtaining money, property or services for personal gain or securing a personal or business advantage. At QatarEnergy, we do not tolerate fraud in any form.

Any concerns regarding fraudulent activities should be raised with a member of our Internal audit team.



*Refer to our Anti-Fraud Policy for further information.*



## Trading Responsibility

The misuse of non-public, commercially sensitive and/or confidential information is known as insider trading. It creates an unfair advantage and can undermine the operation of financial markets. In order to prevent such misuse, we manage access to inside information carefully and limit access only to those with a legitimate business need.

When we have such information in our possession, whether it has come to us through our role at QatarEnergy or otherwise, we never use it to buy or sell securities or encourage others to do so. We never pass such information on to others, inside or outside the organization, without specific authorization. This includes never discussing the information with, or using it for, the benefit of our family and friends.

These restrictions apply to inside information belonging to QatarEnergy, our subsidiaries, joint ventures, business partners or any other organization (whether publicly listed or not).

Be aware that dealing, encouraging others to deal or passing on inside information is not just a breach of our Code but also a criminal offence in many countries.

**Inside information** is a specific type of non-public confidential information that, if it were to become public, would impact the price of securities traded on the financial markets. It could include:

- prices and pricing policies
- production volumes and financial results
- announcements regarding pending corporate acquisitions, assets, dispositions, contract signings, changes and entry into new markets
- information about ongoing or pending disputes or claims.



*Refer to our Regulatory Compliance Policy for further information.*





## Free and Fair Competition

QatarEnergy is committed to the principles of free, transparent and fair competition. While we vigorously compete for new business, we always comply with the competition and anti-trust laws that apply to our operations, both domestically and globally.

We never engage in, or tolerate, unfair methods of competition, such as price fixing, bid rigging or manipulation or abuse of market position. We share commercially sensitive information with others only to the extent permitted by law. Commercially sensitive information is information considered to be particularly sensitive from a commercial or competitive perspective as it may influence competitive conduct on the market. It includes confidential information which is non-public, non-generalized and of a current, recent or predicted nature.

We recognize that we need to take additional care when working on collaborative projects with third parties or attending industry association events and conferences. These situations present an increased risk that non-public, commercially sensitive information may be inadvertently or mistakenly disclosed.

Any concerns about anti-competitive practices, including conversations or other communications that contain potentially anti-competitive content, should be raised with the legal team.

Examples of **commercially sensitive information** include, but are not limited to:

- **prices and pricing policies**
- **margins and cost data**
- **competitive bids and commercial strategies**
- **financial results and strategic plans**
- **customers, markets and product destinations**
- **production volumes and usage**
- **identity and sensitive information pertaining to suppliers, contractors and others**
- **reserve related data.**



*Refer to our Competition Policy for further information.*



## Trade Compliance

In the pursuit of our international operations, we actively seek global business opportunities and partnerships. When doing so, we are committed to operating in compliance with all applicable trade laws and regulations. This includes economic sanctions and laws regarding the transfer of assets. This means that there may be restrictions on how we transfer products, services, funds and information across international borders or within a country, or how we work in a particular country or with a particular economic sector, entity or individual.

Any concerns regarding business activities involving a sanctioned party, market or country should be reported to our legal team immediately.



*Refer to our Trade Compliance Policy for further information.*





## Money Laundering

Money laundering supports criminal activity, including drug trafficking, terrorism, corruption and tax evasion. At QatarEnergy, we are committed to ensuring that our operations do not inadvertently facilitate such activities.

We have adopted anti-money laundering measures and comply with all applicable anti-money laundering laws. We do business only with individuals and entities whose identities have been confirmed as legitimate business entities and only in accordance with properly executed contractual terms and commitments.

Our anti-money laundering procedures must be followed at all times and any suspicious activities reported to the legal team immediately.



*Refer to our Anti-Money Laundering Policy for further information.*

**Money laundering** is the process of disguising the proceeds of crime in order to hide its illegal origins or otherwise dealing with the proceeds of crime.

More broadly, it is all acts contemplated under provisions of Law no. 4 of 2010 Promulgating the Law of Combating Money Laundering and Terrorism Financing.

Alerts as to possible money laundering activities may include but are not limited to:

- an unwillingness to disclose the source or use of funds
- requests made to bypass or circumvent internal controls
- requests for payment in cash instead of using wire transfers
- the use of shell or numbered companies with no registered or disclosed ownership
- structured payment terms in which smaller remittances are requested.



# 4

## WORKING WITH OTHERS

QatarEnergy has a wide range of stakeholders who contribute to, benefit from, or are affected by our organization.

Respectful and effective engagement with all stakeholders is an essential part of being a responsible organization and is key to our success. We build trust-based relationships that lead to better outcomes for all.

We will be judged by our actions as well as our words as we endeavor to develop relationships built on trust.

When we work with others, we are guided by a number of key principles, including shared value, collaboration and a commitment to open dialogue.

A sense of shared responsibility and respect for others is at the core of our stakeholder engagement activities whether that be with local communities, business partners, educational institutions or employees.



*Refer to our Stakeholder Engagement and Sustainability Policies for further information.*



## Our Business Partners

Our business relationships are built on trust and transparency and we believe that working with business partners who have similar values makes good sense. We will not knowingly work with business partners who violate the law, compete dishonestly or use unfair business practices.

As part of our contractual obligations, we make our business partners aware of our standards of business conduct and carry out appropriate due diligence prior to engaging with them. Business partner conduct that does not align with our standards is taken seriously and may lead to the termination of our contractual relationship.

**We must always act impartially and adhere to our procurement standards. We will never provide preferential treatment or other advantages in our dealings with business partners.**

## Engaging with Business Partners

All business partners, agents and intermediaries must be made aware of our Code of Conduct and we always ask to see a copy of their standards of business conduct.

**In addition, we must also undertake due diligence to ensure that our potential partners are:**

- **reputable**
- **legitimate**
- **qualified to carry out the work we are engaging them to do**
- **not under relevant sanctions or regulatory actions**
- **willing and able to establish contractual obligations around ethical business conduct**
- **understanding of the terms and conditions of our contracts**
- **willing to uphold our standards in all transactions with us.**





## The Use of Agents and Other Intermediaries

Agents or other intermediaries may be retained by QatarEnergy to represent our interests and/or act on our behalf. We take steps to minimize the risks associated with the use of agents or other intermediaries. This includes the performance of due diligence in advance of their retention and on a periodic and ongoing basis thereafter.

As part of our contractual engagement terms, we require our agents and other intermediaries to acknowledge and comply with the requirements of our Code and to complete our anti-bribery and corruption training. This must occur on a periodic and recurring basis.



*Refer to our Stakeholder Engagement Policy for further information.*

In order to better understand and know our business partners, agents and other intermediaries, and depending on the risk they pose to us, we carry out certain procedures to ensure that:

- they are reputable, competent and qualified to perform the work they are engaged to do
- the terms of their compensation is reasonable, in line with industry standards and is commensurate with the services they are being retained to provide
- their engagement will be in compliance with our Code and its related policies and procedures
- they do not have a history of illegal acts or regulatory violations
- there are no conflicts of interest that would restrict them acting in QatarEnergy's best interest.

Where such procedures result in negative findings, or where red flags are raised, more in-depth due diligence must be performed which may lead to the ending of our contractual relationship with the individual or commercial enterprise.

**An agent or other intermediary** can include both individuals or commercial enterprises and pose a heightened risk to us as they may represent QatarEnergy to external parties, and often without our participation. Examples include customs agents, freight forwarders and immigration or visa specialists.



## Collaborating with Communities

We are committed to building and maintaining positive relationships with the communities we impact.

This includes contributing to and enhancing the economic and social development of the State of Qatar. We do this through local development, including our Qatarization program, commercial business partnerships and various employment opportunities.

We encourage our people to personally engage with and support community and voluntary programs both within Qatar and the international communities in which we operate. Together we work to earn and maintain community trust and respect.



## Donations and Sponsorships

Our people must not make or receive donations or sponsorships on behalf of QatarEnergy without prior authorization by the President and CEO.



*Refer to our Stakeholder Engagement Policy for further information.*



## Protecting the Environment

QatarEnergy is committed to protecting the environment and we strive to minimize the impact of our operations.

We seek ways to improve our environmental performance through the reduction of greenhouse gas emissions and other practices that have an adverse environmental impact as a result of our operations. This includes our focus on enhancing biodiversity, water and air quality, waste management and other initiatives both within the State of Qatar and throughout our global footprint. Our commitments are outlined in our Environment and Climate Change Policies which highlights our focus on protection, conservation and mitigation efforts.

As a major energy player, we take special care to ensure the efficient and prudent use of resources in our operating locations.



We comply with all applicable environmental laws and regulations, and encourage our people to recognize their individual impact and personal responsibilities to the environment.



*Refer to our Environment and Climate Change Policies for further information.*





## Political Activity

It is QatarEnergy's policy not to make political donations of any kind or engage in political activities or lobbying.

Our people must refrain from engaging in any kind of activities or associate with any organization, body or group involved in a prohibited political, ideological or religious activity. This includes involvement with the distribution or support of any matters that would prejudice the reputation, best interest or prestige of the State of Qatar, its relations with other countries and/or disturbances to the safety and security of the public.

**Political opinions must always be kept as a matter of personal concern and should never be made or stated on behalf of QatarEnergy.**

**Prohibited political activities can take many forms including the following:**

- signing petitions, letters or statements that would prejudice the reputation and prestige of the State of Qatar or adversely affect relations with other countries
- inducing others to join in similar types of political activities
- distributing flyers or other publications related to political messaging.



# 5

## LIVING THE CODE

We are all responsible for adhering to our Code and to the internal requirements governing our work. We must speak up if there is a concern that individuals are not acting in accordance with our Code of Conduct or aligned with our values and/or our standards of business conduct.

Employees in a leadership position must also demonstrate integrity by modelling our Code and leading by example, while ensuring our standards of conduct are adhered to by all QatarEnergy employees and business partners.

In order to live up to this responsibility, we promote an environment that fosters open communication and respect. We can all help to foster a culture of integrity by making our Code a part of our everyday work.

### We must:

- read, understand and work in accordance with our Code
- seek advice if we are ever uncertain as to how to proceed
- report any concerns regarding actual or suspected violations of our Code
- cooperate with investigations if ever requested to participate
- ensure that third parties are aware of our Code and abide by its principles.

We expect our people and business partners to speak up when they observe or suspect that our actions are not aligned with our values and standards of business conduct.





## Our Decision Making Guide

Following our simple decision-making guide should ensure that decisions are in line with our Code. In any situation, the following questions should be asked and advice sought if any of the answers are unclear:

<p><b>1</b> Define the issue</p>	<p><b>2</b> Review the issue against our Code, values and policies</p>	<p><b>3</b> Consider alternative actions</p>	<p><b>4</b> Make the right decision</p>
<ul style="list-style-type: none"> <li>a. What is concerning about the situation?</li> <li>b. Is it legal?</li> <li>c. Who else is involved and what is their perspective?</li> <li>d. What affect does or will this behavior have on the organization?</li> </ul>	<ul style="list-style-type: none"> <li>a. Does it align with and support the principles in our Code?</li> <li>b. Is it consistent with our values?</li> <li>c. Is there a relevant policy that suggests the correct action?</li> </ul>	<ul style="list-style-type: none"> <li>a. Which action best aligns to our Code and values?</li> <li>b. How might the actions affect the organization, its reputation or our business partners and other stakeholders?</li> <li>c. Would my family, friends and co-workers support this course of action?</li> <li>d. What other actions could I take regarding this situation?</li> <li>e. Should I obtain a second opinion from an independent person trust?</li> </ul>	<ul style="list-style-type: none"> <li>a. Am I comfortable with the course of action and its implications?</li> <li>b. Can I show how my decisions are consistent with our Code, values and policies?</li> <li>c. Will my actions add to the success of QatarEnergy and enhance its reputation?</li> <li>d. Would I be happy if my actions were made public?</li> <li>e. What would my family think?</li> </ul>

If anything is still unclear or uncertain, QatarEnergy has appointed a number of Integrity Ambassadors who can help to guide decisions or point out where further information can be found.

## Speaking Up

We expect our people to ask questions and speak up if they have concerns about business practices or suspect violations of our Code, our policies and/or applicable laws and regulations. This is everyone's responsibility.

We know that raising questions and concerns is not always easy, but it is important to do so for the success of QatarEnergy and everyone who works with or for us. When questions or concerns are raised, we wish to resolve them quickly and have clear channels for doing so.

In the first instance, our people must raise questions and concerns with our leaders. If it is not practical to speak to a leader (either a manager, supervisor or head) one of the following should be approached:

- **an Integrity Ambassador**
- **a member of the human resources team (Employee Relations)**
- **a member of the QatarEnergy audit or legal teams**
- **QatarEnergy's General Counsel and Board Secretary**
- **any member of our Business Conduct Committee.**

We have established channels for employees and others to report breaches of our Code by the following options:

- leaving a confidential voice mail message on +974.401.35222
- speaking directly to an expert in confidence by calling +974.401.31829
- sending an email to [hotline@qatarenergy.qa](mailto:hotline@qatarenergy.qa)



*Refer to our Speaking Up Policy for further information.*



Our people are expected to report a breach of our Code and failure to do so may lead to disciplinary actions. We likewise invite our business partners and other stakeholders to raise concerns they may have regarding our business practices.

A Code breach can be reported anonymously through the use of any of our reporting channels, although we encourage reporters to identify themselves when bringing concerns to our attention.

We treat all reported concerns raised in good faith in a confidential and professional manner and are committed to investigating them in accordance with professional investigation standards. This includes protecting those who come forward to report any actual or suspected acts of wrongdoing.

Anyone who reports false or misleading information may be subject to disciplinary action or penalties.



We do not tolerate retaliation against people who raise concerns in good faith and will take disciplinary action for any violations of our non-retaliation stance as outlined in our Speaking Up Policy. The same applies to any intentional abuse of our reporting process, including the raising of malicious or knowingly false accusations.



**Refer to our *Speaking Up Policy* for further information.**



