

DOHA BANK ANTI BRIBERY AND CORRUPTION POLICY STATEMENT

Doha Bank is committed to conducting all business in accordance with the highest ethical standards and in full compliance with all applicable Anti-Bribery and Corruption (“ABC”) Laws and regulations. Consequently, Doha Bank takes a zero-tolerance approach to Bribery and Corruption and implements effective policies, procedures, and controls to counter the risk of bribery and corruption.

Doha Bank ABC Policy and Procedures

The Doha Bank Anti-Bribery and Anti-Corruption (ABC) Policy articulates Doha Bank’s commitment to prohibiting Bribery and Corruption. It outlines principles to identify and manage Bribery and Corruption risks associated with the Bank’s business and provides a framework for the Bank’s ABC program.

The scope of the Policy and Procedures includes the Bank, its foreign branches, entities and representative offices, management, all employees including outsourced staff and external vendors.

Doha Bank’s ABC Policy prohibits the offering, giving, promising to give a financial or other advantage, to another individual in exchange for improperly performing a relevant function or activity (active bribery); or the requesting, accepting, agreeing to accept a financial or other advantage from another individual in exchange for improperly performing a relevant function or activity (passive bribery), where the expectation of good faith or impartiality is breached, or a position of trust is misused. In addition, the Policy prohibits the Bribery of Public Officials either directly or through a third party to obtain or retain business or obtain or retain an advantage in the conduct of business. Furthermore, the Policy

- Prohibits facilitation payments.
- Prohibits any improper accounting or concealment of complete and accurate financial activity.
- Prohibits engaging in the offer or acceptance of Gifts and Business Hospitality in order to influence the recipient in an improper manner. Gift and Business Hospitality must be exclusively aimed at promoting, maintaining, and straightening business relationships and are subject to approvals. Gifts of Cash or cash equivalents are strictly prohibited.
- Prohibits the provision of employment or other paid or unpaid work experience (e.g., internships) as an inducement or quid pro quo to obtain or retain business, to gain an unfair business advantage or to influence a government or regulatory action.
- Prohibits Charitable Donations or Sponsorships for the purpose of improperly influencing any individuals associated with the entity to obtaining or retaining a business advantage.

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- Prohibits Political Contributions.
- Requires adequate due diligence on third parties prior to entering a commercial relationship, to ensure that the manner in which they carry out their business is consistent with Doha Bank's commitment to conduct business ethically, with integrity and in line with applicable Anti Bribery and Corruption laws.
- Requires employees to complete ABC training on a regular basis.
- Requires a risk assessment on a periodic basis to identify inherent risk and determine the effectiveness of the Banks's ABC risk controls.
- Requires risk-based monitoring or testing of employee activities to detect instances of non-compliance with Policy and Procedural requirements
- Requires a process to receive, investigate, resolve and document alleged misconduct, with appropriate disciplinary action taken when an investigation confirms a violation of Anti Bribery and Corruption Laws or the Policy and Procedures.

Doha bank ensures that appropriate tools are in place for reporting suspicions of bribery and corruption incidents.

- For more information on Doha Bank, please visit:

Doha Bank website: www.dohabank.com.qa

- To raise any bribery and corruption related concerns, please contact:

Email: antibribery-corruption@dohabank.com.qa

Doha Bank (Q.P.S.C.)
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