



شركة قطر للأضافات البترولية المحدودة
Qatar Fuel Additives Company Limited

**THE CHEMISTRY
OF OUR BUSINESS:**
The QAFAC Code of Conduct



Our Vision

Be a leading producer of Methanol & MTBE recognized for our reliability and the quality of our products



Our Mission

To produce high quality Methanol, MTBE and other derivatives by developing our talent, fostering our culture of excellence and maintaining the highest HSE standard. We create value for all our stakeholders and contribute to Qatar National Vision 2030

Our Values



SAFETY

We ensure safety in everything we do.



PEOPLE

We care about people.



EXCELLENCE

We strive for continuous improvement in all dimensions.



INTEGRITY

We always choose to do the right thing.



RESPONSIBILITY

We care deeply for the environment and all the communities we impact.

A Message from the CEO

Our QAFAC culture is strong, and we pride ourselves on our success as well as on our integrity. We have built our QAFAC family around trust, respect, hard work and excellence. We never want those strengths to wane.

We also have ambitious plans for QAFAC, and in support of Qatar's National Vision 2030, we expect to continue to rise to new challenges as our goals evolve. As QAFAC changes, we must also take the time to consider the compliance risks we face now and in the future, as well as our high expectations for our behavior.

With that in mind, I ask you to take the time to read our Code of Conduct (our "Code") and consider some of those important risks and expectations.

Our Code cannot cover every risk we might face, but it can provide you with the knowledge and resources needed to identify potential issues and seek appropriate guidance. At a minimum, we must all be ready to ask questions and seek guidance when issues arise. Please review the **Speak Up** section of our Code for more information on raising concerns. Remember that QAFAC does not tolerate retaliation against employees who report concerns in good faith.

I trust that QAFAC and its employees will always seek to operate effectively, successfully and with high integrity. That is what we have always done. Our Code and our efforts to identify, discuss and address compliance risks will seek only to continue that strong tradition.



Ahmed Abdulqader Al-Ahmed

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Introduction to Our Code

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Our Responsibilities: We Always Do the Right Thing

Our Code of Conduct (our “Code”) is a tool to better understand the risks QAFAC faces and the expectations we have for you to address those risks. Our Code applies to all of us, including our directors, officers, secondees, employees and all persons doing business with QAFAC.

We always follow our Code, QAFAC’s policies and all applicable laws and regulations, and we pay due respect to the traditions and customs of the State of Qatar.

Failure to comply with our Code or our policies can subject you to disciplinary action including termination of employment. Violation of applicable law could also result in personal criminal or civil liability. QAFAC’s reputation and your personal reputation are also at stake when you engage in misconduct or violate our Code, our policies or any applicable laws.

Where our Code or our policies set higher standards than those legally required, the requirements of our Code and policies will apply.



You are expected to:

- Do the right thing
- Read and understand our Code and applicable QAFAC’s policies
- Speak up, ask questions and report any concerns



Managers are also expected to:

- Lead by example and take responsibility
- Have an open door for questions and concerns
- Encourage a culture of trust and integrity
- Protect employees from retaliation when they raise concerns



Decision-making

Our Code does not cover every situation you might face. QAFAC relies on all of us to use good judgment, so when you confront difficult or new circumstances, you are always expected to do the right thing and think carefully about your decisions.

Speak Up

Your primary responsibility in QAFAC's compliance program is to speak up when you have questions or concerns.

You are the eyes and ears of the organization, and QAFAC depends on you to raise questions when you feel our Code, our policies or the law might be violated.

Your first resource is usually your manager. In most cases, your manager will be the best person with whom to discuss your concerns.

However, there are some cases when talking to your manager is not possible or is uncomfortable. In those cases, you can seek help by calling the following:

Administration Department +974 44766711

Legal Department +974 44766754

Internal Audit +974 44766736

Email: coc@qafac.com.qa

QAFAC does not tolerate any form of retaliation, reprisal or victimization against anyone who reports a concern in good faith. QAFAC will keep reports confidential to the extent possible and will follow up on reports in a timely, professional and appropriate manner.



Some questions you can ask yourself when confronted with a complex issue or problem include:

- Do I know everything I need to know to make my intended decision?
- Does my intended decision follow QAFAC's values and support our mission?
- Does my intended decision follow our Code, our policies and the law?
- Does my intended decision improve or support the reputation of QAFAC?
- Would I be comfortable defending my intended decision to my friends and family?

If your answer to even one of these questions is "no," then you should seek assistance from your manager or one of our Speak Up resources listed below before proceeding.



QAFAC

Regenerant Gas Scrubber (RGS) Project Commissioning

“Reducing Environmental Impact and Enhancing Fuel Efficiency”

Honeywell
UOP



Sa

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Safety: Ensuring Safety in Everything We Do

Occupational Health & Safety

Safety is our top priority. We strictly follow our safety rules and procedures and aim to achieve “no harm” each and every day we operate. We ensure there is a focus on safety in everything we do.

Please see our [Occupational Health and Safety Policy](#) for more information.



What We Do

- We eliminate, mitigate or reduce occupational health and safety risks.
- We proactively prevent work-related illness and injury.
- We respond comprehensively to any safety incidents.
- We comply with all applicable laws and regulations.
- We report risks and incidents completely.

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People: Caring About Each Other

Respectful Workplace

Our success as an organization depends on maintaining a respectful workplace that is free of inappropriate behavior and harassment and provides a professional working environment for all of QAFAC's employees.

Managers have a special duty to create a safe and open workplace and to report any threats or instances of harassment or discrimination to Human Resources.

Please see our [Respectful Workplace Policy](#) for more information.



What We Do

- We treat everyone justly and with fairness, dignity and respect.
- We prevent any harassment, intimidation, abuse and bullying.
- We avoid any discrimination of suppliers, partners or communities affected by QAFAC's operations.
- We hire and promote employees based on competencies and performance.
- We engage and develop Qatar nationals in line with national goals.





Human Rights

We respect the human rights of all people impacted by our activities and engage with communities to identify opportunities for positive interactions that are respectful and appropriate to local culture.

Please see our [Human Rights Policy](#) for more information.



What We Do

- We do not allow any discrimination based on race, age, disability, gender, or political or religious beliefs.
- We provide safe, healthy and secure working conditions.
- We do not work with business partners who employ children or minors, engage in human trafficking or forced labor, deny employees the right to leave employment, or require employees to lodge deposits of money or identity papers with the partner.
- We comply with all applicable human rights laws and regulations.

Privacy

We respect others' personal information and act responsibly and carefully when collecting, processing, retaining, disclosing and disposing of any personal information.

Please see our [Privacy of Personal Information Policy](#) for more information.



What We Do

- We use and share personal information only for specific, explicit and legitimate business purposes.
- We always follow all applicable laws related to privacy.
- We collect children's personal information only for specific purposes related to schooling and medical services, and only with appropriate parental permission.
- We keep data only as long as is strictly necessary for legitimate business purposes.
- We ensure that any third parties we work with who may have access to personal information understand and comply with our data protection standards.

Stakeholder Engagement

We engage respectfully with all stakeholders, including our employees, our business partners, governments, civil society, educational institutions and local communities.

QAFAC's managers set objectives, plans and targets regarding stakeholder engagement as well as routinely monitor and report on these plans.

Please see our [Stakeholder Engagement Policy](#) for more information.



What We Do

- We keep an open dialogue and consult with stakeholders and communities on policies, projects and initiatives that reflect community priorities.
- We provide government representatives with information on our projects and policies.
- We respect local culture and traditions.
- We maintain a responsible purchasing policy and dialogue with our suppliers.



Use of Agents & Third Parties

We are careful about the kind of individuals and organizations we allow to represent QAFAC and to act on our behalf.



What We Do

- We investigate and conduct sufficient due diligence of potential agents and third parties before we engage them, and we continue to monitor them while we have a business relationship.
- We work only with agents and third parties who are reputable, competent and qualified for the work they are engaged to do.
- We ensure that our agents and third parties respect our values and follow our Code and our policies, and we make sure that there are no **conflicts of interest** that could affect these parties' commitment to QAFAC.



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Excellence: Striving for Continuous Improvement



Asset Protection

QAFAC relies on the responsible use of its assets to conduct our business successfully.

Please see our [Asset Protection Policy](#) for more information.

QAFAC's assets may include material items, such as our facilities and equipment; electronic and financial assets; and intellectual property such as trade secrets, trademarks, patents and copyrighted materials.

QAFAC reserves the right to block access to inappropriate websites, to monitor information technology assets and to intercept messages or files stored on or transmitted to or from such assets.



What We Do

- We responsibly use and maintain QAFAC's assets.
- We protect QAFAC's assets against theft, unauthorized use, abuse and damage.
- We respect and protect the assets of our third parties and others.
- We responsibly use QAFAC's information technology assets, such as laptops, mobile phones, tablets and networks, in accordance with all QAFAC policies and procedures.
- We do not use QAFAC's assets for our personal use except for occasional and limited personal use of information technology assets that does not interfere with our work.

Conflicts of Interest

We conduct business in an ethical and transparent manner such that our personal interests never conflict with the interests of QAFAC.

Please see our [Conflicts of Interest Policy](#) for more information.



What We Do

- We make unbiased and objective decisions on behalf of QAFAC.
- We do not use our position with QAFAC, or the assets and information of QAFAC, for our personal gain.
- We make sure that our personal, family or close relationships do not create actual or potential conflicts of interest.
- We remove ourselves from any decision-making on behalf of QAFAC in which our judgment could be perceived to be affected by a potential conflict of interest.
- We promptly disclose any actual or potential conflicts of interest.

Confidential Information

We carefully protect QAFAC's confidential information, including all non-public materials related to the operation of our business, such as contracts, bid information, prices, financial results, budget and business plans, personnel information and third-party technology.

Please see our [Confidential Information Policy](#) for more information.



What We Do

- We share confidential information only when it serves a specific business purpose.
- We share confidential information only with persons who have a business need to know the information.
- We maintain the confidentiality of information that belongs to third parties.
- We avoid any unauthorized internal or external disclosure of confidential information.
- We maintain the security of confidential information and never remove it from QAFAC premises without prior approval.

When planning to share any confidential information, we should always ask ourselves:

“Do I need to share this information for a QAFAC business purpose?”

If the answer is “no,” then we should not share the information.

External Communications

We aid in maintaining QAFAC's reputation by speaking with one voice in a consistent, transparent and professional manner.

Please see our [External Communications and Disclosure Policy](#) for more information.



What We Do

- We ensure that information is disclosed externally only with proper planning and specific authorization.
- We do not communicate or comment on behalf of QAFAC unless we are specifically authorized to do so, and we make sure that all media and external stakeholder requests are directed to the appropriate spokespeople.
- We keep our values and our Code in mind when using social media or communicating externally, and we never:
 - Suggest we represent QAFAC on social media unless we are specifically authorized to do so
 - Post negative comments about QAFAC or make derogatory remarks or inappropriate characterizations of people, governing bodies or other entities doing business with QAFAC
 - Release or discuss confidential information on any platform

Regulatory Compliance

We follow all applicable laws and regulations and make sure that we properly maintain all necessary licenses, permits and government authorizations necessary to QAFAC's operation.

Please see our [Regulatory Compliance Policy](#) for more information.



What We Do

- We keep all records accurately.
- We record all transactions in a timely, complete and fair manner.
- We make sure no false or misleading information is recorded, and we never use off-the-books accounts or avoid accurate reporting by any other methods.
- We observe and maintain all applicable internal controls.
- We obtain and maintain all licenses, permits and authorizations consistent with applicable law and regulations.
- We report all information consistent with international financial reporting standards and generally accepted accounting principles.

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Integrity: Choosing to Do the Right Thing

Gifts & Entertainment

Building business relationships can involve gifts and entertainment, but the exchange of gifts and entertainment must never be seen as influencing our decision-making or the decision-making of others.

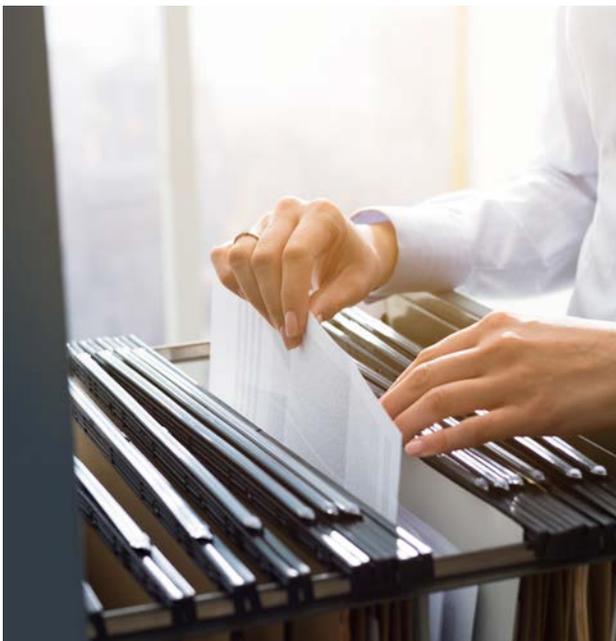


What We Do

- We never accept any gifts or entertainment unless they are infrequent, appropriate and nominal enough in value that we are not embarrassed to discuss them.
- We never provide any gifts or entertainment unless they are nominal, appropriate and unable to be misconstrued as an attempt to influence the decision-making of the recipient.

“Nominal” means the value of the gift or entertainment must not exceed QAR500 (or the equivalent amount in a local currency) or any value that may be advised from time to time by QAFAC. This amount is per person per event. Any exceptions to this value must first receive the approval of senior management.





Accurate Books & Records

We must record and maintain our business records accurately and completely.



What We Do

- We follow our record retention procedures regarding the manner in which we store, retrieve and destroy data.
- We never alter records, create false records or destroy data in any manner inconsistent with our policies and procedures.
- We follow professional accounting and financial reporting standards.

Business records can include contracts, purchase orders, receipts, communications, bid submissions, estimates, meeting minutes and agendas, presentations, policies and procedures.

Insider Trading

We do not use non-public commercially sensitive or confidential information to trade in securities of any organization.



What We Do

- We handle commercially sensitive or confidential information carefully.
- We never pass or “tip” commercially sensitive or confidential information to others who do not have a specific business need to know.
- We never trade in the securities of any organization based on non-public commercially sensitive or confidential information we have learned in our role at QAFAC.

Non-public commercially sensitive or confidential information can include pricing policies, production volumes, financial results, pending acquisitions or dispositions, pending agreements, market information or pending settlements.

Anti-Fraud

Fraud can affect our business performance and occurs when someone makes a deliberate misrepresentation to obtain money, property or services for personal gain.

Managers must ensure that controls to detect and prevent fraud are maintained.

Please see our [Anti-Fraud Policy](#) for more information.



What We Do

- We are aware of potential opportunities for fraud in our business, and we develop controls to address those risks.
- We report any questions or concerns we might have about potential fraud.

Anti-Bribery

Offering or accepting bribes or any other benefits in exchange for receiving a business advantage is against QAFAC's policy and against the law. Anything of value can be a bribe, including gifts, favors, offers of employment, travel expenses and donations. No amount is too small to be considered a violation if the intent is to influence a decision or an official action.

Please see our [Anti-Bribery Policy](#) for more information.



What We Do

- We ensure that we never offer a bribe to, or accept a bribe from, any employee official (including a public official) or agent of any government, public or commercial entity.
- We ensure that no one, including any third parties or agents that are working for QAFAC, offers or accepts a bribe on behalf of QAFAC.
- We recognize that there may be rare exceptions to this policy where an individual's health, life and liberty are at risk, and that if payment is demanded or provided under these circumstances, we contact QAFAC's Legal Department immediately.
- We contact QAFAC's Legal Department if we have any questions or concerns.



Competition

We believe in free, transparent and fair competition, and while we do all we can to be successful, QAFAC neither engages in unfair competition nor violates applicable competition laws.

Please see our [Competition Policy](#) for more information.



What We Do

- We never engage in unreasonable restraint of trade, unfair trade, price fixing, bid rigging, manipulation of market position or any other anti-competitive behavior.
- We take great care when we interact with competitors so that there cannot be even the appearance of improper behavior.
- We never share QAFAC's non-public commercially sensitive or confidential information, including prices, costs or bidding practices, or any other non-public information with actual or potential competitors.
- We contact QAFAC's [Legal Department](#) if we have any questions or concerns.

Anti-Money Laundering

Money laundering is the process of conducting transactions to hide the illegal nature of proceeds from a crime. Whenever we are conducting transactions with partners, customers and other third parties, we must be on the lookout for signs of money laundering.

Please see our [Anti-Money Laundering Policy](#) for more information.



What We Do

- We avoid all suspicious transactions involving numerous or unusual counterparties or monetary transfers, or any other unusual requests.
- We conduct due diligence on and know the ownership and identity of our customers and other counterparties to our transactions.
- We bring concerns about any irregular or suspicious transactions to the attention of QAFAC's [Legal Department](#).



Political Activity

QAFAC neither makes political donations nor engages in any form of political lobbying.

Donations & Sponsorships

Any donations or sponsorships by QAFAC must be approved by the CEO.



What We Do

- We never suggest we speak on behalf of QAFAC on any political matter, and we keep our personal political opinions private.
- We never engage in or associate with any organization or group involved in prohibited political, ideological or religious activities, nor do we support any matter that would damage the reputation, best interest or prestige of the State of Qatar.



What We Do

- We never suggest that QAFAC will sponsor any entity, commit to any donation or provide support for any organization or cause without first receiving express authorization from the CEO.



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Responsibility: Caring Deeply for the Environment and All the Communities We Impact



Environmental, Social & Corporate Governance

We are mindful about the impact we have on the communities where we operate.

Climate Change

QAFAC provides clean, accessible and affordable energy in the most responsible way. We recognize the critical nature of climate change and of QAFAC's role in addressing climate issues.

Please see our [Climate Change Policy](#) for more information.



What We Do

- We contribute to and enhance the economic and social development of the State of Qatar.
- We promote the goals of our Qatarization program.
- We engage in our local communities and support volunteer opportunities.



What We Do

- We integrate climate change considerations into our strategic and operational decision-making.
- We exercise the governance processes we have established for sustainability and climate change.
- We work with industry and regulatory authorities to develop and implement climate policies and regulations.



Environment

QAFAC is always working to minimize our impact on the environment.

Please see our [Environmental Policy](#) for more information.

QAFAC managers must also:

- Set objectives and targets, and monitor progress toward environmental goals
- Implement procedures, guidelines and plans
- Routinely inspect and report on systems, processes and performance
- Provide a comprehensive response to protect people and the environment should an incident occur



What We Do

- We show concern and respect for our environment and seek ways to achieve prudent use of our resources.
- We minimize environmental impacts and pollution through waste reduction and management, conservation of water, emissions reduction and biodiversity protection.
- We develop and encourage practices such as the reduction of greenhouse gas emissions.
- We follow all applicable laws and regulations and set a high standard for environmental protections when such regulations do not exist, and we work with local communities and governments to monitor and manage any environmental impacts.
- We focus on preventing leaks, spills and other risks, and we manage any potential impacts with a rapid and comprehensive response.
- We conduct environmental due diligence in our supply chain and with contractor and other third-party partners, and we encourage those partners to prevent pollution and protect the environment.

Sustainability

We are focused on developing and maintaining sustainable policies and procedures for QAFAC.

Please see our [Sustainability Policy](#) for more information.



What We Do

- We integrate sustainability into our planning and business management processes.
- We monitor our performance in line with Global Reporting Initiative (GRI) standards and in support of the United Nation's Sustainable Development Goals and Qatar National Vision 2030.
- We support the well-being and training of our workforce.
- We reduce our carbon footprint and combat climate change.
- We choose sustainable investment practices and deliver social and economic benefits to our communities.

Trade Compliance

We operate in compliance with all applicable trade laws and regulations, including economic sanctions and laws regarding the transfer of assets.

Please see our [Trade Compliance Policy](#) for more information.



What We Do

- We carefully follow any trade compliance regulations, customs regulations, sanctions regimes and import or export controls related to the transfer of products, goods, services or technologies across international borders.
- We seek assistance from our manager or another **Speak Up resource** if we have any questions about transferring materials or technology.





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Conclusion & Resources

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Reminder – Speak Up!

Your primary responsibility in QAFAC’s compliance program is to speak up when you have questions or concerns.

In most cases, your manager will be the best person with whom to discuss your concerns, but if you are not comfortable speaking to your manager, you can seek help by calling the following:

Administration Department +974 44766711

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Internal Audit +974 44766736

Email: coc@qafac.com.qa



Policies

[Occupational Health and Safety Policy](#)

[Respectful Workplace Policy](#)

[Human Rights Policy](#)

[Privacy of Personal Information Policy](#)

[Stakeholder Engagement Policy](#)

[Asset Protection Policy](#)

[Conflicts of Interest Policy](#)

[Confidential Information Policy](#)

[External Communications and Disclosures Policy](#)

[Regulatory Compliance Policy](#)

[Anti-Fraud Policy](#)

[Anti-Bribery Policy](#)

[Competition Policy](#)

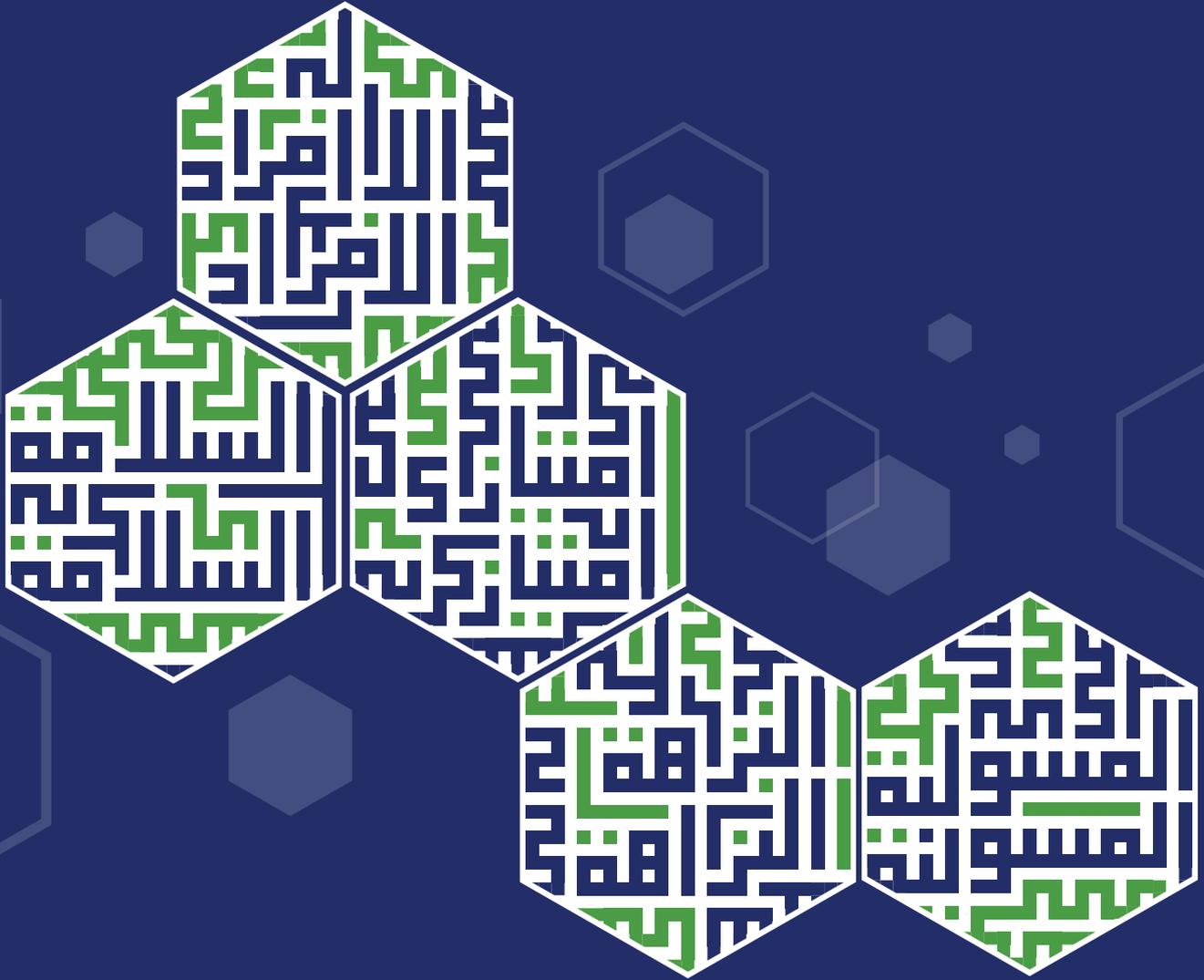
[Anti-Money Laundering Policy](#)

[Climate Change Policy](#)

[Environmental Policy](#)

[Sustainability Policy](#)

[Trade Compliance Policy](#)



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الرعاية المسنولة
التزامنا نحو الاستدامة
RESPONSIBLE CARE®
OUR COMMITMENT TO SUSTAINABILITY