

QNB FINANSBANK ANTI-BRIBERY AND CORRUPTION POLICY

PURPOSE

The objective of this procedure is setting out clear principles and rules, for the prevention and combating of bribery and corruption, as well as providing guidance on how to recognize such acts, raising awareness among employees of QNB Finansbank (the Bank) to avoid actions related to bribery and corruption, encouraging confidential reporting of suspicions through the appropriate communication channels in order to protect the Bank's image and reputation.

SCOPE

The scope of this policy covers all employees of the Bank and generally any person working for the Bank, under a contract of employment or otherwise and all third parties who perform services for or on behalf of the Bank.

DEFINITIONS

In this policy, the following definitions shall be used:

Bribery: In broad terms, it is defined as the offer, promise, giving, demanding or acceptance of an advantage as inducement for an action which is illegal, unethical or a breach of trust or rewarding a person for the improper performance of such function or activity. It does not matter whether the person to whom the advantage is offered, promised or given is the same person as the person who is to perform, or has performed the function or activity concerned. Bribery can be in many forms such as money (cash or shares), unreasonable (beyond normal criteria) gifts, kickbacks, corruption, facilitation payments, political/charitable contributions, uncompensated use of the Bank/company services or facilities, etc.,

Corruption: It can be summarized as the misuse of entrusted power or office, whether in the public or private sector, for private gain. It also has the same attributes as set out in the above "Bribery" definition.

Kickbacks: Kickbacks arise when suppliers or service providers pay a part of their fees to the individuals who give them the contract or some other business advantage.

Facilitation Payments: These are small bribes with the intention to speed up the routine procedures which the entity is already entitled to.

RESPONSIBILITIES

The Board of Directors of the Bank (BoD) is responsible for approving this Policy, as well as overseeing its implementation and periodic assessment.

The Senior Management of the Bank is responsible for establishing all necessary procedures for the appropriate implementation of the Policy as well as the training of the personnel in bribery and corruption related matters in order to ensure continuous awareness and vigilance. Compliance Division assists the Board of Directors and the Senior Management in developing, appropriately implementing and reviewing the Policy and related procedure (**TAL.01125** QNB Finansbank Anti-Bribery and Corruption Procedure) whenever necessary.

GENERAL PRINCIPLES

Bribing any foreign or domestic public officials directly or indirectly is strictly prohibited.

The Bank ensures that there are adequate provisions in agreements signed with third parties performing services on behalf of the Bank, regarding the prevention of bribery and corruption.

QNB FINANSBANK ANTI-BRIBERY AND CORRUPTION POLICY

All new employment contracts and agreements with employees in general shall include anti-bribery and corruption provisions and clauses.

It is prohibited for bank employees to ask for or receive gifts from customers, suppliers or other third parties they have relations on behalf of the Bank, directly or indirectly. These principles also apply to gifts to be given to the family and kin of the employee by the said parties. The rules of giving or accepting gifts are explained in detail in the relevant procedure.

Normal and appropriate hospitality/gifts (given and received) are not prohibited according to the limit set out in the related procedure.

It is prohibited for bank employees to make any donation to any political organization/party or individuals on behalf of the Bank.

The Bank ensures that charitable contributions and sponsorships are not used as a means of influencing third parties with the ultimate purpose of obtaining preferential treatment or business benefits.

In any case, offering or receiving gifts in the form of cash, irrespective of the amount, is strictly forbidden.

TRAINING

The Bank ensures that this policy and related procedure are clearly communicated to all personnel and training is provided.

REPORTING

The Bank ensures that the appropriate tools are provided to personnel for reporting violations in confidence (whistle-blowing) in case of bribery and corruption incidents.