



Group Anti-Corruption & Anti-Competitive Policy

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1. DOCUMENT CONTROL SHEET

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2. OUR COMMITMENT

Ooredoo commits to conduct its business with integrity and transparency in accordance with good ethics and governance principles. We have adopted a zero-tolerance policy to bribery and corruption. Ooredoo also commits to not act in any way that may restrain trade or reduce competition in the marketplace. Ooredoo strives to conduct business in a manner that does not create a conflict of interest in their professional dealings and commits to build a sound and transparent business. Ooredoo is dedicated to ethical, fair, and vigorous competition. This policy is in line with Ooredoo Group's Code of Business Conduct and Ethics.

3. PURPOSE & SCOPE

This policy highlights the Company's zero-tolerance position on bribery and corruption and commitments to conduct business with the highest standards of integrity and honesty. This policy establishes guidelines for the Company and its employees to prevent breaches of anti-bribery, anti-corruption laws, and anti-competitive practices. Ooredoo's employees are provided with access to all company policies and ethical guidelines. They are also provided continuously with training to reinforce their understanding and ensure proper implementation of this policy.

Our policy sets out the minimum standards we expect from all employees working for Ooredoo or on its behalf in any capacity, including employees at all levels, directors, officers, suppliers, contractors, external consultants, third-party representatives, and business partners.

4. FULFILLING OUR COMMITMENT

Ooredoo complies with all applicable national and international laws and regulations applicable pertaining to anti-corruption and anti-competitive practices. Ooredoo assures procedures to identify and understand corruption risks in order to apply preventive measures. Ooredoo's efforts to prevent corruption and any misconduct include the following:

1. Promoting internal awareness and training on preventing and reporting any misconduct. All Employees have a personal responsibility and obligation to conduct the Company's business activities ethically and in compliance with the law;
2. Carry out due diligence in order to validate associated persons/entities and identify possible conflicts of interest;
3. Disclosing accurate, consistent and efficient financial records and any other business records involving dealings with third parties, such as clients, suppliers and business contacts;
4. Providing a confidential and safe reporting system to allow employees or other stakeholders to report instances of corruption or other suspicious activity anonymously. Kindly refer to [Whistleblowing Policy](#).
5. Maintaining an effective system of internal controls and compliance measures.

This policy applies to everyone working for Ooredoo Group. We expect our suppliers and business partners to take bribery and corruption seriously and adheres to our standard

terms place obligations on them. The prevention, detection and reporting of any forms of corruption are the responsibility of all those working for Ooredoo or under its control.

Ooredoo Group prohibits the following practices, at all times and in any form:

- Bribery
- Facilitation payments
- Extortion or solicitation
- Political donations
- Benefits (gifts, events, entertainment, travel etc.)

Ooredoo prohibits the above-mentioned associated persons to do any of the following:

1. Give, offer, receive or solicit any form of bribe, kickback or other corrupt payment, or anything of value benefit with the expectation that a business advantage will be received, or to reward a business advantage already given (Kindly refer to Ooredoo Group Code of Business Conduct & Ethics Policy for details);
2. Give, promise to give, offer or tolerate a “facilitation payment” or other benefit to a government official, agent or representative to ensure that routine procedures are carried out or speeded up;
3. Accept payment or the promise of payment from a third party, legal authorities, business partners and other parties having business relations with us, that you know, or suspect is offered with the expectation that it will obtain a business advantage for them;
4. Exert any influence on the will or objectiveness of persons in order to obtain a benefit or rewards through practices that are unethical or contrary to applicable laws;
5. No political donations, which means political donations and contributions for political purposes to any politician, political party or related organization are strictly forbidden.

All the workforce including management and supervisory staff are expected to adopt all necessary steps to create a compliant culture within their respective departments and to ensure their staff are aware of their responsibilities and obligations towards Ooredoo.

5. DEFINITIONS AND CLARIFICATIONS

The following terms and acronyms are used within this document and are defined as follows:

<p>Bribery</p>	<p>Bribery is the action of giving or promising money, favor, or an object of value in order to impact the judgement, decision or conduct of a person/entity.</p>
<p>Corruption</p>	<p>Corruption is the misuse or abuse of the authority held due to the position held for private gain. Solicitation is the practice of requesting another to commit or aid in an unlawful act or crime.</p>
<p>Facilitation payments</p>	<p>Facilitation payments are typically small, unofficial payments paid to government officials to secure or expedite routing.</p>
<p>Political donations</p>	<p>Political donations are donations or contributions provided to elected officials or individual members of political parties or organizations.</p>

6. POLICY OVERVIEW

While the Group's activities are largely focused on Qatar and the other jurisdictions where it operates through subsidiaries or joint ventures, there are a number of Sanctions Laws which may dictate (directly or indirectly) where and with whom the Group can conduct business activities. The Group may also be subject to prohibitions or restrictions on conducting business in certain territories or with certain third parties based on the provisions of agreements entered into with Business Partners, or the terms and conditions of arrangements entered into with banks and other financial institutions. Failure to comply with these programs and contractual obligations could have serious financial consequences and reputational risk for the Group and may result in disciplinary action being taken against any Group Personnel who approved, directed, facilitated or had knowledge of such violations or breaches. The purpose of this Policy is to ensure that all business transactions are conducted in compliance with all applicable Sanctions Laws and regulations.

Sanctions is a complex area of the law and as such all Group Personnel are required to not only ensure that they understand this policy but must also actively engage with the function handling compliance at the beginning of each related business transaction to ensure that transactions do not breach any Sanctions program or the provisions of agreements entered into by the Group with third parties, if any.

The rationale to impose Sanctions on a third party is based on diverse interests, including political, economic and national security interests. These interests change rapidly and therefore Sanctions are subject to significant and constant change.

Under no circumstances should any international business transactions be conducted contrary to this Policy.

You must contact the compliance function if you have questions or if you need to screen or undertake other due diligence on a Business Partner.

7. COMPLIANCE & REPORTING

Ooredoo rejects all forms of corruption and applies a zero-tolerance approach to any breach of this policy. Suspicions of bribery/corruption or failure to comply with this policy will lead to internal investigation about the alleged breach and may result in a disciplinary action (up to and including termination of employment).

Ooredoo guarantees the employees are provided with the appropriate tools for reporting suspicions or violations in confidence (whistleblowing) in case of bribery and corruption incidents. If a breach or suspected breach of this policy has been identified by any of Ooredoo's employees; they must immediately report to the Group Chief Audit Executive. Kindly refer to Whistleblowing Policy - [Ooredoo Whistleblowing | Ooredoo corporate](#)

8. TRAINING

An adequate processes and routines to ensure ongoing training programs for all relevant employees shall be implemented. All employees are required to undertake mandatory training courses.

9. APPROVALS & REVIEW

The Audit & Risk Management Committee of Ooredoo has overall responsibility to ensure this policy complies with legal and ethical obligations.

Any amendment of this policy will be preliminary reviewed by Audit & Risk Management Committee and will be finally approved by the Board of Directors

This policy has been reviewed and approved by senior management of Ooredoo. This policy will be periodically reviewed, taking into consideration any organizational, business or legal changes that may occur.