



**Qatar National Bank
(Q.P.S.C.)
Third Party Supplier Code of
Conduct (TPSCC)**

Summary Profile	3
1- Introduction	4
2- Scope of Application	4
3- Other policies to reference.....	4
4- Anti-bribery and anti-corruption	5
5- Conflict of interest	5
6- Money laundering and sanctions	6
7- Human rights.....	5
8- Child labour	6
9- Discrimination, treatment and equal opportunities.....	6
10- Freely Chosen Employment and Ethical Recruitment.....	6
11- Labour rights and labour practices.....	6
12- Management, monitoring and evaluation	7
13- Health and safety	7
14- Environment and sustainability	7
15- Climate change.....	8
16- Information, data security and data privacy.....	8
17- Cybersecurity.....	8
18- Product safety and quality	9
19- Financial integrity	9
20- Tax Transparency and Compliance.....	9
21- Business continuity.....	9
22-Supply chain risk	10
23- Transparency and communication.....	10
24-Adherence	10
25-Reporting, raising concerns and whistleblowing	10

Summary Profile

Scope / Coverage	QNB Group
Publication Date	October 2024
Version	2

This Third Party Supplier Code of Conduct document sets out the expectations, principles and standards Qatar National Bank (Q.P.S.C.) requires all existing and prospective Third-Party Suppliers to adhere to.

1. Introduction

Qatar National Bank (Q.P.S.C.) (“QNB”) is committed to ethical business practices, sustainability and high standards of integrity throughout our businesses, partnerships and our supply chain. Responsible sourcing is one our key commitments to ensure that we continue to deliver financial services with the highest professional standards within the communities we serve. QNB has a zero tolerance policy towards unethical conduct and has developed its Third Party Supplier Code of Conduct (“TPSCC”) outlining the minimum standards that third parties (suppliers, contractors, vendors, consultants, agents, service providers, providers of materials and products), their parent companies, subsidiaries, sub-contractors, associated entities and all personnel (permanent, temporary, contract workers) employed or engaged to provide services to QNB are expected to adhere to when conducting business with and entering into arrangements with QNB.

2. Scope of Application

Third parties are required to fully comply with all applicable laws, regulations and QNB applicable policies when conducting business with QNB, the scope and provisions set out in the QNB TPSCC are minimum standards, requirements, expectations and principles to be adhered to by all third parties.

QNB expects third parties to assist QNB in the fulfillment of any legal and regulatory obligations that may arise in the course of the relationship. Third party suppliers are required to read and pledge to commit to the minimum standards and requirements of third party suppliers. In addition, it should be noted that the provisions in this code will be binding on the supply of a contract or procurement order. The standards of the TPSCC are in addition to and not in lieu of provisions of any agreement or contract between third party suppliers and QNB.

3. Other Policies to Reference

The QNB Group Code of Ethics and Conduct [ESG Policies and Statements](#) is the main policy document which describes QNB’s commitment to ethical conduct.

Other related policies include:

- QNB Group Anti-Bribery and Anti-Corruption Policy statement [ESG Policies and Statements](#);
- QNB Group Sustainability Policy [Sustainability Management at QNB](#);

4. Anti-Bribery and Anti-Corruption

QNB is committed to the prevention of bribery and corruption through all its business dealings and practices and it is expected that our third party suppliers will adhere to these standards as well. Third party suppliers must not engage in any form of corrupt practices, including but not limited to extortion, fraud, bribery and collusion and shall ensure they have appropriate anti-bribery and anti-corruption policies, programs and code of conduct requirements whilst having business arrangements with QNB. Third party suppliers must not engage in offering, paying, soliciting or receiving (directly or otherwise) any form of bribe, which maybe considered an illicit inducement or reward for any business transaction such as (but not limited to) monetary gifts, loans, commissions, services, pleasure trips and gifts.

5. Conflict of Interest

All individuals and entities providing goods or services to QNB must maintain the highest ethical standards and avoid any situation that may give rise to a conflict between personal interests and the interests of QNB. This would include, but is not limited to, situations where personal, financial or familial interests interfere with fair and impartial business decision making.

Suppliers shall disclose to QNB in writing any situation, relationship, or circumstance that may give rise to a conflict of interest. Failure to disclose a potential conflict of interest may result in the termination of the business relationship.

6. Money Laundering and Sanctions

QNB is required to meet all Anti Money Laundering (AML) and Counter Terrorist Financing (CTF) obligations, legal and regulatory responsibilities, QNB has a zero tolerance approach to non-compliance with AML, CTF and sanctions requirements and laws. We expect our third parties to maintain appropriate control management systems and frameworks to ensure adherence in meeting these requirements.

7. Human Rights

All third party suppliers shall comply with all applicable human rights related laws in respect of their employees and business operations. They should also conduct their business activities in a manner which respects human rights as set out in the UN Universal Declaration of Human Rights and the core conventions of the International Labour Organization (ILO).

Harassment, harsh or inhumane treatment of employees will not be tolerated. All employees must be treated with dignity and respect and suppliers must not use any, threats of violence, sexual exploitation or abuse, verbal or psychological harassment or abuse.

8. Child Labour

All third party suppliers shall at a minimum ensure adherence and consistent practice with the rights set forth in the Convention on the Rights of the Child by the ILO and such other requirements as may be recognised under national laws of the country or any country where performance in whole or in part of a contract takes place.

9. Discrimination, Treatment and Equal Opportunities

All third party suppliers shall ensure that equality of opportunity and treatment in respect of employment and occupation without discrimination (e.g. age, gender and ethnic origin) as may be recognised under the national laws of the country or countries where the performance, in whole or in part, of a contract takes place.

10. Freely Chosen Employment and Ethical Recruitment

All suppliers shall demonstrate that employment is voluntary and ensure ethical recruitment practices within their businesses and respective supply chains. Suppliers must not engage in or support any form of slavery, forced or compulsory, bonded, prison, indentured labor, or human trafficking of involuntary labor through threat, force, fraudulent claims, coercion or duress. Third party suppliers must also not permit their sub-contractors to engage in these practices. Third party suppliers shall fully comply with the requirements of applicable slavery, forced labor, human trafficking, freedom of association and the right to collective bargaining laws of country or countries where the performance on whole or in part, of a contract takes place.

11. Labour Rights and Labour Practices

QNB is committed to promoting fair labor practices and respecting the rights of workers throughout its operations. QNB expects its third-party suppliers to comply with all laws and regulations related to labor rights and to implement fair labor practices throughout their operations. Suppliers shall pay all workers and employees at least the minimum wage as required by applicable laws and regulations and provide all legally mandated benefits in a timely manner. Suppliers shall provide workers and employees with reasonable working hours within and not exceeding the maximum allowed by local labour laws, accommodation in accordance with acceptable living conditions, and proper rest days as may be required by applicable laws and regulations.

All employment conditions should be clearly communicated to employees and any wage deductions should be in compliance with the applicable domestic laws. Workers shall be enabled to openly communicate and share grievances with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment.

12. Management, Monitoring and Evaluation

QNB expects that its third party suppliers have developed appropriate management systems related to the content of this code and any arrangements with QNB in order to ensure its objectives and requirements are met, QNB expects that third party suppliers actively review, monitor and modify their management processes and operations to ensure compliance. QNB conducts annual on-site visits to evaluate and inspect third party suppliers operations, facilities and offices, as well as those of their sub-contractors in Doha, Qatar. The scope of these visits will be determined by factors such as the supplier's sector, size, geographical location, and the type of work performed. These visits are conducted to review progress, assess risk, and ensure adherence to agreed-upon standards. Additionally, a Third Party Risk Attestation process for relevant International Branches is completed on an annual basis.

Third party suppliers must at all times demonstrate compliance with the QNB TPSCC on request. This includes providing a Quality Management System (QMS) certificate upon request. Furthermore, third-party suppliers must promptly update QNB if their QMS certificate is revoked or if there are any changes that affect their compliance status. Third party suppliers must, on request from time to time supply relevant documents and information including, but not limited to, supplier factory locations, supplier sub contractor names and locations and results of historic audits. Suppliers must ensure that documentation is retained to enable them to meet those requirements and demonstrate compliance with the QNB TPSCC.

13. Health and Safety

Third party suppliers shall ensure that they meet all the legal and regulatory requirements and obligations pertaining to health and safety and so far as is reasonably practical to ensure their employees have a safe working environment within the country or countries where the performance, in whole or in part, of a contract takes place.

In addition, third-party suppliers must establish and maintain a comprehensive Health and Safety policy that outlines their commitment to safety standards and practices. They should be prepared to share this policy upon request as a demonstration of their commitment to ensuring the well-being of their employees and compliance with relevant health and safety regulations.

14. Environment and Sustainability

QNB requires all third party suppliers to comply with all legal and regulatory requirements relating to protection of the environment. Suppliers should wherever possible support a proactive approach to promote environmentally sustainable practices, initiatives, awareness and responsibility including but not limited to; conservation, recycling, environmentally friendly technologies and effective waste management.

On a best effort basis, third party suppliers should reduce operational environmental impacts such as electricity and gas consumption, travel emissions, water consumption, management of hazardous materials, and waste and recycling production, especially greenhouse emissions.

15. Climate Change

Climate change and Greenhouse Gas (GHG) emissions are major global challenges that have significant impacts on the environment, human health and economies. QNB expects its third-party suppliers to be aware of the impacts of their operations on the environment, including their GHG emissions.

Suppliers are also expected to comply with all relevant laws and regulations related to GHG emissions. In addition, QNB encourages its suppliers to consider the use of renewable energy sources and to adopt best practices to reduce their environmental footprint.

16. Information, Data security and Data Privacy

Third party suppliers shall comply with QNB's requirements relating to personally identifiable information (PII data), confidentiality, security, data privacy and intellectual property protection as set out in the QNB Data Protection and Privacy Policy, and Information Security Policy. Suppliers shall ensure that appropriate controls are in place to protect QNB's brand, intellectual property against unauthorised use and damage. Any information used or disclosed in the business relationship with QNB that is non-public and proprietary must be protected against loss and infringement. Any disclosure or use of such information must only be for the purposes authorised by the contractual agreement. In case of sub-contracting the sharing and disclosure of any confidential information is strictly prohibited unless the consent of QNB is granted third party suppliers shall inform QNB of any changes to their T&C's in relation to usage of PII.

17. Cybersecurity

With the increasing reliance on technology and the internet in business operations, cybersecurity is a critical concern for QNB. QNB expects its third-party suppliers to take appropriate measures to protect against cyber threats, such as implementing robust security controls and compliance with relevant laws, regulations and related standards related to cybersecurity.

Suppliers must have a plan in place to identify and mitigate potential cybersecurity risks, and have a process for incident response and recovery in case of a security breach. They should also have procedures in place to ensure the protection of sensitive customer information, and to comply with standards and regulations such as ISO27001, GDPR and PCI-DSS.

18. Product Safety and Quality

Qatar National Bank (QNB) is committed to providing its customers with safe and high-quality products and services. As such, QNB expects its third-party suppliers to adhere to the highest standards of product safety and quality throughout their operations. This includes compliance with all applicable laws and regulations, implementing robust quality control measures, and providing accurate and transparent information about the products and services they provide.

QNB expects its suppliers to take all necessary steps to ensure that their products and services meet or exceed industry standards, meet the needs and expectations of customers, and are free from defects or hazards. This includes performing regular inspections, testing, and audits to ensure that products and services meet safety and quality standards. In addition, suppliers must have a process in place to address and resolve customer complaints and safety concerns in a timely and effective manner.

19. Financial Integrity

Third party suppliers should ensure that they maintain solvency, practice financial prudence with appropriate governance and keep accurate financial records of all matters related to their business with QNB in accordance with standard accounting practices such as Generally Accepted Accounting Principles (GAAP) or International Financial Reporting Standards (IFRS).

20. Tax Transparency and Compliance

Third party suppliers are required to maintain full tax transparency and ensure compliance with all applicable international and local tax laws, including but not limited to FATCA, CRS and other relevant applicable regulations.

21. Business Continuity

QNB is committed to managing, controlling and ensuring service continuity throughout its business operations. Third party suppliers are expected to maintain appropriate management and control frameworks to ensure business resiliency practices are appropriate and fit for purpose in relation to the services and products they deliver to QNB.

QNB expects its suppliers to manage continuity risk to ensure availability of critical services to QNB during a disastrous event. It is a requirement that each supplier maintains a comprehensive business continuity program that addresses the loss of facilities, technology, human capital or suppliers necessary to support QNB. QNB expects suppliers to perform regular BCP/DR to appraise their resiliency and identify potential issues that would impact continuous service delivery to QNB. Suppliers are expected to share these plans and test results as requested.

22. Supply Chain Risk

Where the provisions of goods and services or activities to QNB are subcontracted or materially reliant / dependent upon other fourth or fifth parties (etc.), we expect our third parties to ensure any of their relevant third party supply chain risks are identified, assessed and managed through a defined framework, any changes or risks impacting the supply of services or products to QNB should be escalated in a timely manner to QNB. We encourage our third party suppliers to extend the principles of the TPSCC through their supply chain.

23. Transparency and Communication

QNB values transparency and open communication with its third-party suppliers. QNB expects its suppliers to be transparent and communicative throughout their business dealings with QNB, providing accurate and timely information about their operations and any changes to their business, and being responsive to any questions or concerns raised by QNB.

Suppliers should have a dedicated point of contact for QNB and must have a system in place to effectively communicate with QNB and provide relevant information or reports as required. This includes providing regular updates on their operations, performance, and any changes to their business that may affect their relationship with QNB.

24. Adherence

This code is incorporated by reference into the contract with the supplier and is legally binding. Any breach of the mandatory requirements set forth in this code may result in actions being invoked against the supplier in accordance with the terms and conditions of the contract. In cases of non-compliance, the supplier may be required to implement corrective action plans to remediate the issue. Additionally, we reserves the right to conduct re-audits to verify that improvements have been made and sustained.

25. Reporting, Raising Concerns and Whistleblowing

QNB expects its suppliers to help our business succeed and promote our values and high professional standards, including our commitment to do the right thing by our various stakeholders. QNB is committed to fostering an environment where our third party suppliers and sub-contractors can raise any concerns about any actual or suspected breach of this code or actual or suspected misconduct.

QNB's TPSCC is available on QNB's website and concerns relating to QNB's TPSCC can be reported via the email address below:

- Email address: whistleblowing@qnb.com
- Third Party Supplier Code of Conduct (TPSCC): [ESG Policies and Statements](#);

Qatar National Bank (Q.P.S.C.)
P.O. Box 1000, Doha, Qatar
Tel: +974 4425 2444
Fax: +974 4441 3753

qnb.com