

# QNB Group Human Rights Statem<u>ent</u>



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# **Summary Profile**

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## 1. Introduction

In line with our position as the largest financial institution in MEA and one of the leading banks in MEASEA, Qatar National Bank (Q.P.S.C.) ("QNB Group") believes a key element of our success is contingent on observing and respecting all elements of human rights.

This human rights statement is informed by the:

- United Nations Guiding Principles (UNGP) on Business and Human Rights;
- International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work;
- Principles of the UN Global Compact (UNGC);
- Universal Declaration of Human Rights;
- International Finance Corporation (IFC) Performance Standards;
- UK Modern Slavery Act; and
- Local jurisdictional employee and human rights regulatory requirements where QNB operates.

## 2. Purpose

The aim of this statement is to apply a consistent approach to respecting human rights across QNB Group and to align and comply with international human rights standards, principles, and requirements.

This statement provides an overview of QNB Group's approach to observing and respecting human rights, rather than a detailed set of rules for implementation. As required, this statement may be supplemented by topic-specific policies, position statements, and/ or local guidelines within respective jurisdictions, to support implementation across relevant divisions, functions (business, support, and control), and locations.

QNB Group adheres to required local labour laws and regulations where we operate. We acknowledge internationally recognised sustainability principles for environmental protection, human and labour rights, and anti-corruption.

QNB Group will seek to raise awareness of human rights and provide an example of good practice through our own conduct in jurisdictions where we operate.

QNB Group monitors current and emerging human rights-related regulation and standards to ensure that our policies and practices are considered and adapted accordingly.

#### 3. Scope

This statement is applicable to QNB Group. Any person working for QNB, under a contract of employment or otherwise, is required to abide by this statement.

This statement should be viewed as minimum guidance; international branches and subsidiaries may supplement with additional information to cater for local specifications as required.

## 4. Human Rights Principles

## 4.1 Core principles

Informed by the UN Guiding Principles on Business and Human Rights, ILO's Declaration on Fundamental Principles and Rights at Work, as well as respective Principles of the UN Global Compact, QNB seeks to uphold the below principles in the management of our business and stakeholder relationships as to promote and respect human rights:

## **Respect to Human Rights**

QNB Group fully respects the human rights of people impacted by our business and ensures dignity and equality for all, without discrimination.

## Anti-discrimination

QNB Group respects the rights of individuals belonging to groups or populations, which may be exposed to discrimination on the grounds of race, gender, age, ethnicity, religion, disability, nationality, or political opinions. This applies to all employees, as well as to suppliers, clients, and community partners.

### Fair remuneration

QNB Group strives to compensate employees competitively relative to the industry and local labour market. QNB Group is fully compliant with applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits.

## Equal opportunities and training

QNB Group provides its employees with a wide range of training programs to facilitate their performance according to the set standards. Each employee will be supported, where possible, in keeping their knowledge and skills up to date with best practice standards in the assigned field of work. QNB Group encourages employees to seek professional and specialised qualifications/ certificates in their field of work.

### Freedom of association and collective bargaining

QNB Group respects freedom of association and collective bargaining, in accordance with local laws and the ILO Fundamental Principles and Rights at Work. QNB values social dialogue and engagement with management on topics of concern.

### No forced labour, no child labour and no human trafficking

QNB Group ensures all work is voluntary and all employees are legally permitted to work in the country they are being employed. We prohibit child labour and human trafficking throughout our value chain and business relationships. QNB Group supports the removal of all forms of forced labour and the effective eradication of child labour throughout our supply chain. Indicators of forced labour are integrated into our <u>Third Party Supplier Code of Conduct</u> and Third Party Risk Management (TPRM) approach to prevent these practices from occurring.

### Health, safety and environment

QNB Group recognises safety and health at work as a fundamental right. We strive to promote a safe and healthy working environment. We promote, establish, and maintain a workplace in which employees treat each other with respect, dignity, and tolerance. QNB Group ensures that these are addressed through established standards and procedures within the Group.

#### Harassment

QNB Group adopts a zero-tolerance approach to violence, victimisation, unfavourable treatment, and immoral harassment in the workplace, including sexual harassment. We expect others to be treated with dignity, respect, and concern for their health and safety. QNB Group encourages employees to use whistleblowing channels to communicate instances of harassment or immoral treatment.

#### **Grievance mechanisms**

QNB Group provides grievance mechanisms for our employees, customers and third-party suppliers, and have procedures in place for such events. Employees, customers, and third-party suppliers are encouraged to use these channels without fear of reprisal.

#### 4.2 Duty of care as an employer

In line with QNB Group's Mission to be the institution of choice for customers, employees, investors, and suppliers, our <u>Code of Ethics and Conduct</u> is considered to be an integral part of QNB's policies and forms a framework and guidance for the conduct of business. It is also a reference point when dealing with colleagues, customers, suppliers, and regulators.

QNB Group employees are made aware of their employment rights through our various policies and practices that are in place. These are included within our <u>Code of Ethics and Conduct</u> and Human Resources Policies.

We have various policies, including, but not limited to the below, that cover a series of additional matters, which promotes human rights:

- <u>QNB Group Sustainability Policy;</u>
- QNB Human Capital Global Policy (including Employee Grievance);
- QNB Modern Slavery and Human Trafficking Transparency Statement;
- QNB Group Communications Policy Corporate Social Responsibility;
- QNB Whistleblowing Policy; and
- <u>QNB Group Anti-Bribery and Corruption Policy Statement.</u>

We strive to provide continuous cooperation and maintain coordination among colleagues to foster a culture of innovation and creativity, as well as encourage cooperative initiatives. We must treat others in the way that we would like to be treated ourselves – with dignity, respect, and concern for their health and safety.

# 4.3 Duty of care as a Financial Service Provider

As QNB Group, we are exposed to a large international client base, increasing exposure to potential risks, including those related to human rights. As a financial service provider, QNB Group takes various precautions as to minimise such risks.

This section should be read and applied in conjunction with the prevailing policies, including, but not limited to:

- <u>QNB Group Environmental and Social Risk Management (ESRM) Policy Framework;</u>
- Know Your Customer (KYC) Policy;
- Customer Acceptance Policy;
- Customer Protection Policy;
- Personal Data Protection Policy;
- QNB Group Anti-Bribery and Corruption Policy Statement;
- Group Sanctions Policy;
- **QNB Group Sustainability Policy;**
- <u>QNB Privacy & Security Policy;</u>
- FATCA and CRS Policy;
- Information Security Policy;
- QNB Whistleblowing Policy; and
- **QNB Code of Ethics and Conduct.**

- 1. As part of origination and providing financial services, material human right aspects should be considered as part of the customer due diligence process.
- 2. Before providing financial services, there must be adequate tests to ensure that the identity of the customer, relevant parties and any beneficial owner do not match with any person of a known criminal background or with banned entities that are available in monitoring systems and other databases referred to by QNB Group.
- 3. Provision of finance (where within scope) should be as per the QNB Group ESRM Policy Framework.
- 4. QNB Group will provide customers with products and services that supports our ESG (environmental, social, and governance) objectives. Any potential risk within this regard should be evaluated as per the appropriate governance mechanisms.
- 5. To the extent of our capabilities, QNB Group will prevent the risk of any financial crime being conducted through our systems, processes, and operations. Whether this being money laundering, fraud, tax evasion, bribery and corruption.
- 6. QNB Group will ensure customer information is protected and that we respect the right to privacy within the guidelines of all applicable privacy and data protection laws and regulations, such as the EU General Data Protection Regulation (GDPR) where applicable.
- 7. In the event where we discover or are made aware through grievances or complaints, that we have caused or have been associated with actual or perceived human rights abuses, QNB Group will take appropriate action.

## 4.4 Purchasing and Sourcing Responsibilities

QNB Group has various policies and practices which are applicable to vendors and business relationships within our supply and value chain. This section should be read and applied in conjunction with the prevailing policies, including:

- <u>QNB Third Party Supplier Code of Conduct;</u>
- Outsourcing and Vendor Management Policy;
- Fraud Control Policy;
- **QNB Group Anti-Bribery and Corruption Policy Statement;**
- Group Risk Third Party Risk Management Policy;
- Group Sanctions Policy;
- **<u>QNB Group Sustainability Policy</u>**;
- ONB Whistleblowing Policy; and
- **<u>QNB Code of Ethics and Conduct.</u>** 
  - 1. QNB Group endeavours to maintain our support for human rights throughout our supply chain and established behaviours and practices that we seek to be similar to our own standards and policies, as laid out in the QNB <u>Third Party Supplier Code of Conduct</u>.
  - 2. QNB Group ensures that proper due diligence is conducted within our Third Party Risk Management Framework, which is adequate with the level of risk and complexity of its third-party relationships by appropriately assessing, measuring, and monitoring risks associated with the use of a third-party relationship.
  - 3. QNB Group conducts appropriate due diligence to ensure our third party providers agree to uphold acknowledged employment and human rights principles.

4. QNB Group entities must not engage in any contract agreement with individuals and entities subject to sanctions concerns, such as, but not limited to, individuals and entities named in any of the QNB Sanctions lists.

## 4.5 Beyond Banking

We actively contribute towards wider socio-economic development through our Corporate Social Responsibility activities in the communities where we operate. In addition, we also support a range of external initiatives under the following categories: society and humanitarian affairs, arts and culture, health and environment, and sport.

Within the communities in which QNB Group operates, we seek to understand the impacts that our business may have on the communities and manage it accordingly. We strive to encourage civilised and open society by preserving our high standards of business conduct, which includes abstaining from giving or receiving bribes or any illicit payments.

We will consider ESG aspects when selecting communities or organisations to support through our community investment and socio-economic development programmes.

# 5. Reporting, Disclosure and Transparency

QNB Group will report related ESG metrics through disclosures in our annual QNB Group Sustainability Report. This is in accordance with GRI standards, UNGC Communication on Progress (COP), Qatar Central Bank (QCB) ESG Supervisory Principles, and Qatar Stock Exchange (QSE) ESG performance metrics.

This strategy reflects QNB Group's support of the UN Guiding Principles on Business and Human Rights and our commitment to disclose and promote transparency regarding our sustainability activities, policies, and progress.