Code of Business Ethics

Policy

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1 GENERAL

1.1 PURPOSE

This Policy describes the rules that QatarEnergy LNG ("QELNG") and all Employees (including direct hires, Contract Staff, and secondees) must comply with in respect of business ethics and Conflict of Interest. The purpose of this Policy is to enhance the Company's reputation for honesty, integrity and reliability by establishing and maintaining clear rules of conduct and ethical behavior and minimizing possibility of Conflict of Interest arising between Employees' private interests and Company interests.

1.2 SCOPE

The Policy applies to all Employees and members of the Company's Board of Directors. Employees are expected to comply with all aspects of the Code of Business Ethics Policy. Employees who fail to comply with this Policy will be considered to be in violation of his or her employment contract and will be subject to appropriate disciplinary action as per applicable Company Policy, including termination.

1.3 CRITICALITY

This Policy has been determined to be a High Criticality document.

Criticality Level: High

1.4 KEY RISKS AND CONTROLS

The key risks and controls associated with this Policy are detailed below. This is not intended to be an exhaustive list of all possible risks and controls but highlights the most common inherent risks and most basic controls which need to work to deliver the intended objective of the process.

Key Risks	Key Controls	Reference
Non-compliance with Business Ethics and Conflict of Interest rules may jeopardize the confidence of outside Entities in the integrity of Company and impact Company reputation and business relations. Breach of business ethics rules may result in financial loss and also exposing Company and individuals to criminal and civil liability.	Company has established Business Ethics and Conflict of Interest Committee (ECIC) to deal with all issues related to business ethics, investigate cases of Policy violations and take necessary actions to eliminate and mitigate possible risks. Employees are required to certify annually that they have read understood and will comply with the Business Ethics Policy. Employees are required to complete	Section 2.4

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Key Risks	Key Controls	Reference
	annually the Conflict of Interest Declaration and report to Company any direct or indirect Conflict of Interest situations. ECIC regularly assesses reported Conflicts of Interests and takes actions to avoid potential risks. Employees are encouraged to seek guidance of their managers and ECIC if in doubt, report violations and familiarize themselves with the Policy requirements.	

Table 1: Key Risks and Controls

1.5 CLASSIFICATION

This Policy has been classified as 'Internal' based on INF-ISG-POL-001 Information Classification Policy.

1.6 COMPLIANCE

To assure Management's, Shareholders' and external stakeholders' confidence in the Company's policies and practices; QELNG Internal Audit may verify without notice, compliance with this Policy.

The Chief Executive Officer shall re-validate this Policy every 3 years to ensure that it continues to serve the purpose intended.

All Employees are required to observe the Company's Policies and Procedures.

1.7 ROLES & RESPONSIBILITIES

Company Management has a responsibility to ensure that the Policy is understood, enforced and implemented by all Employees.

Line managers, Department Managers and Chief Officers have a responsibility to set an example of the highest standard of ethical conduct and to monitor compliance with the Policy by all Employees who report to them. Line managers, Department Managers and Chief Officers have a responsibility to report to ECIC or to Internal Audit situations where they have reasonable grounds to believe that an Employee reporting to them is involved in an actual or potential violation of this Policy or Conflict of Interest situation.

Employees are responsible for:

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- Seeking guidance of their line manager, Department Manager, Chief Officer or the ECIC when any issue arises in respect of this Policy.
- Reporting any violation of this Policy, illegal act or unethical behavior immediately to the ECIC or to Internal Audit. Reporting is confidential and no Employee will suffer retaliation because of a report made in good faith.
- Familiarizing themselves with the Policy.

Employees should avoid situations where the end result is the accomplishment of something that the Company could not legally or ethically do directly.

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2 CODE OF ETHICS FUNDAMENTAL PRINCIPLES

All Employees are expected to act in a manner that will enhance the Company's reputation for honesty, integrity and reliability. Employees are ambassadors of the Company and must carefully consider the image they project. QELNG must not only conduct, but must be seen to conduct, its business dealings in accordance with high ethical standards.

The Company is committed to a Policy of fair dealing and integrity in all aspects of its business. When acting on the Company's behalf, Employees must comply with all laws, behave with integrity and treat all organizations and peoples in a fair and honest manner.

Contractors and suppliers should be made aware of the requirements of the Ethics Policy. The Company expects and shall ensure its suppliers and contractors adhere to a Code of conduct equivalent to the provisions of this Policy.

Although the various matters dealt with in this Code do not cover the full spectrum of Employee activities, they are indicative of the Company's commitment to high standards of conduct. They are to be considered descriptive of the type of behavior expected from Employees in all circumstances and are to be regarded as the minimum standards of performance required. In addition, the Company seeks to enforce not only the letter, but the spirit of the Code as well. These standards are applicable in all countries in which QELNG operates, unless the laws of those countries require a higher standard.

2.1 FISCAL INTEGRITY AND RESPONSIBILITY

All Employees are responsible for protecting Company assets and are specifically responsible for establishing and maintaining appropriate internal controls to safeguard Company assets against loss from unauthorized use or disposition and ensure their efficient use. They are expected to handle the assets of the Company with due regard to the interests of shareholders, creditors, Employees and other stakeholders of QELNG.

2.1.1 FINANCIAL ACCOUNTING AND REPORTING

Each financial or business transaction must be executed in accordance with management's specific authorization and be recorded with accuracy and fairness. All Company books, records and accounts shall be kept in a manner that reflects, accurately and completely, the true nature of the transaction. Furthermore:

1) All accounts and financial transactions must be reported in the financial accounts. There shall be no "off the record" accounting transactions or accounts;
2) Employees shall not make any false or misleading entries in the accounts or records of the Company;
3) All QELNG business transactions and accounts will be made available to all external and internal audit authorities;

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4) All expenses and reimbursements must be business related, properly authorized, and accurately described in such accounts;
5) No customer or vendor is to be over or under invoiced for any reason;
6) Fees and commissions to consultants, agents and other third parties must be legal, proper and consistent with industry practice;
7) Employees will not use any commissions, fees, discounts or other funds payable in a way that accomplishes indirectly what the Company would not or could not do directly; and
8) Employees shall comply with the Company's financial, accounting and internal control procedures.

2.1.2 USE OF COMPANY PROPERTY

Personal use of Company property is not permitted without specific express authorization from the appropriate reporting line.

2.1.3 INTELLECTUAL PROPERTY

The Company recognizes and fully respects the legal rights of others on matters involving the ownership and use of intellectual property. “Intellectual property” includes all of the propriety, intangible assets of the Company such as patents, inventions, trademarks, copyrights, trade secrets, or propriety information.

The Company will:

1) Comply with copyright laws and respect the rights of owners of films, videos, books, written materials and computer software.
2) Not knowingly infringe or make illegal use of any trademark, patent, trade secret or proprietary technology or information belonging to a third party.
3) Respect and comply with the terms of all software licenses, including ensuring Employees do not copy software onto any computer for which the software is not registered.
4) The Company places great value on its own intellectual property and will take appropriate measures to ensure its proprietary assets are not infringed upon or misappropriated by others. Employees must not disclose any intellectual property of the Company without authorization from the ECIC.
5) All intellectual property, inventions, technology developed or conceived by Employees during or as a result of their employment with the Company, which are known, or could reasonably be anticipated to be of direct benefit to the Company must be reported and is the property of the Company.

2.1.4 TRAVEL AND ENTERTAINMENT

Travel and entertainment expenses should be consistent with the needs of business and with the Company’s travel expense Policy.

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2.2 TENDERING, CONTRACTING AND PROCUREMENT

The Company Policies and Procedures for the procurement of goods and services, tendering and awarding of contracts must be adhered to strictly. It is Company policy that:

1) All contracts should be awarded on the basis of competitive bids, except in those circumstances where a negotiated bid is expressly authorized or a bid waiver is obtained; The Company's actions with respect to bidders or potential bidders are fair, ethical and beyond reproach;
2) Employees shall not disclose any information either directly or indirectly to a potential bidder which would confer a competitive advantage, result in personal gain, or may be detrimental to the welfare, interest or image of the Company;
3) All contracts receive proper review and approval within the authorities delegated;
4) The Company's business, operational, financial and legal interests are protected;
5) Technical and commercial evaluations of all proposals are done thoroughly and objectively.

2.3 CONFIDENTIAL INFORMATION AND DISCLOSURE

In the course of employment, Employees may have access to information or insider information that is confidential, privileged, of potential value to competitors, or that might be damaging to the Company if improperly disclosed. All Employees must protect the confidentiality of such information as well as similar information relating to companies that have business dealings with the Company in accordance with the Information Classification Policy (INF-ISG-POL-001). The use or disclosure of this information must be for Company purposes only and not for personal benefit or the benefit of others. For example, if a person possesses material non-public financial information regarding a company or its securities, that person is prohibited from buying or selling stock in the company until the information has been disclosed and disseminated to the public. This is because the person who knows information that will probably cause the stock price to change, and it would be unfair for the person to have an advantage over the rest of the investing public.

To preserve confidentiality, disclosure and discussion of confidential information should be limited to those Employees who need access to the information in the course of their work.

All information, data and records acquired and/or generated in the course of business are the property of the Company. Employees must not disclose any information either verbally, in writing, or electronically, to other Employees, the media, bidders or any third party without written consent and knowledge of the Company's appropriate authority.

Employees who have access to commercially competitive, sensitive or confidential information shall strictly comply with the Firewall Policy and procedures and should take appropriate measures to ensure the material is kept in a secure manner and is not distributed or copied to

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those who should not have access to such information. Safeguarding of information, electronic data and records is an important responsibility of all Employees.

Confidential Information means any and all information directly or indirectly disclosed or provided by or on behalf of the Company, in whatever format and irrespective of the medium in which it is contained, acquired or produced by the Company, its affiliates, joint venture partners, contractors or suppliers, including without limitation, plans, budgets, agreements, drawings, reports, specifications, calculations, and all other documents and information relating to the customers, business, assets or affairs of the Company.

Employees shall separate their personal and social roles from their Company position when communicating on matters involving Company business. Employees must not speak or allow to be seen as speaking for the Company on any matter unless they are certain that the views they express are those of the Company and that it is the Company's desire that such views be publicly disseminated by such Employees.

2.4 CONFLICT OF INTEREST

The purpose and objective of this procedure is to enhance the confidence of outside Entities in the integrity of the Company and its Employees by:

- Establishing clear rules of conduct with respect to Conflict of Interest and;
- Minimizing the possibility of Conflict of Interest arising between the private/personal interests and Company interests related to official duties of Employees and providing for the objective and fair resolution of such conflicts should they arise.

A Conflict of Interest arises in situations where a choice has to be made between an Employee's personal interest (financial or otherwise) and the best interest of the Company. A Conflict of Interest is any direct or indirect interest, or connection that may lead to personal gain or benefit for that Employee from any activity where the Employee's position or authority may influence decision making, or that may compromise impartiality or judgment in the performance of duties, and/or adversely affects the interests of the Company. If there is any doubt about the existence of a conflict, an Employee must consult his/her line manager, Department Manager, Chief Officer or the ECIC.

Sometimes appearances can be as damaging as actions. Therefore, Employees must not only refrain from becoming involved in actual conflict situations, they shall also avoid placing themselves in positions that may be perceived as conflicts.

It is not possible to cover every potential situation in which a Conflict of Interest may arise. Therefore, it is imperative that Employees understand their obligation not to use or appear to use one's position in a self-serving manner. A non-exhaustive list of examples of Conflicts of Interest are provided in Appendix 3.

All Employees and directors shall comply with the following Conflict of Interest rules:

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2.4.1 CONFLICT OF INTEREST

Employees or their Families shall not have direct or indirect Interest in any Entity or business enterprise that has current or prospective dealings with the Company as a contractor, supplier, customer, landlord or sponsor, unless that Interest is declared by the Employee and approved by the ECIC. Employees may be required to dispose of such Interests and must be removed from or disqualified from any activity involving the award or administration of contracts or purchases. An Interest includes holding a position or to act in any capacity as director, officer, partner, consultant, employee, distributor, agent or the like for suppliers, contractors, subcontractors, customers or other Entities doing or seeking to do business with the Company.

2.4.2 AVOIDANCE OF CONFLICT OF INTEREST

Employees must act honestly and in good faith with a view to the best interests of the Company as taking priority over personal interests. They shall avoid situations in which, their personal interests may affect their judgment in acting on behalf of the Company. Employees shall avoid Conflicts of Interest whenever possible and disclose them to the Company and the ECIC when they do exist.

2.4.3 GUIDANCE ON CONFLICT OF INTEREST

Any Employee may be faced with a situation in which personal interest, or the interest of persons or Entities to which the Employee is associated, may conflict with the interests of the Company. When an Employee is faced with a situation where personal interest (or the interest of persons or Entities to which the Employee is linked) may conflict with Company interests, the Company's interests must prevail. The Employee must first and foremost consider the Company's interest in the decision-making process. Where there is any doubt, about the best course of action in a particular circumstance, the Employees shall consult his/her, line manager, Department Manager, Chief Officer or the ECIC.

2.4.4 BRIBERY, GIFTS AND IMPROPER BENEFITS OR REWARDS

a) Employees shall not offer, promise, give, pay, solicit or accept any bribe in the form of either money or anything else of value for the purpose of improperly obtaining or receiving favorable treatment. This includes, but is not necessarily limited to, entertainment, meals, refreshments, gratuities or gifts.

b) Employees shall not accept a Prohibited Gift (as defined in paragraph c below), entertainment or anything else of value from a contractor, supplier, customer, landlord, sponsor or any Entity with whom the Company has commercial dealings without the written consent of the ECIC, except where, in the case of a gift or entertainment, the value is within the limits prescribed by the Company from time to time or is of a promotional nature and within commonly accepted industry practice and guidelines established by the Company.

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c) Prohibited Gifts include: cash, shares, air tickets, hotel rooms, jewellery, furniture, interest-free loans, frequent meals, repairs of house or car, jobs for relations, use of hire cars, offices or apartments.

d) Allowed Gifts include: occasional, infrequent gifts of nominal value not exceeding the lesser of 2% of monthly total salary or QAR. 400, which are normal in the industry and under the circumstances such as meals, desk / pen sets, testimonials, plaques, calendars, sweets etc.

e) Gifts offered with a value exceeding the lesser of 2% of monthly salary or QAR 400 shall be reported by the Employee to his/her line manager, Department Manager or Chief Officer, who shall in turn consult and seek approval from the ECIC regarding the acceptability thereof.

f) Employees shall not accept loans from Entities doing business with the Company, except for normal personal loans from banks and recognized financial institutions.

2.4.5 EMPLOYEE DECLARATIONS AND DISCLOSURE

g) Employees must declare any direct or indirect interest held by themselves or their Family, or to the best of their knowledge their Extended Family, in any Entity that has current or prospective dealings with the Company, irrespective of whether the Entity is within or outside Qatar, or the activity of that Entity (whether as a consultant, contractor, supplier, customer, landlord sponsor or otherwise). The Employee shall be removed from or disqualified from any involvement in the preparation, evaluation, award or administration of such contracts.

h) Outside Employment - Employees must disclose to the ECIC, for assessment of whether an actual or potential Conflict of Interests exists, if the Employee holds a position in another Entity, whether paid or unpaid, including board membership (whether executive or non-executive), or advisory or consultant roles.

i) Annual Conflict of Interest Declaration – All Employees shall complete the appropriate Annual Conflict of Interest Declaration within the Reporting Period of each year for the preceding year. (Appendix 3). Any Employee, who deems it appropriate, taking into consideration the provisions of the Code of Business Ethics Policy, may make a voluntary declaration at any time. The information in the forms shall be treated by the ECIC as confidential and shall be released to Employees' line manager, Department Manager and Chief Officer on a "need to know" basis.

The ECIC may exempt Employees from completing Annual Conflict of Interest Declarations if such Employees are on a prolonged absence from the Company and are not in a position to perform their job function during such absence (for example long-term sick leave; study leave; leave for military service; or maternity leave).

Department Managers shall ensure that Contract Staff involved in procurement, tendering, bids, contract negotiation and administration have completed and submitted

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the Annual Certification Statement and Conflict of Interest Declaration either online or manually as applicable.

The ECIC may also exempt Contract Staff who are (i) not involved in procurement, tendering, bids, contract negotiation and administration; and (ii) do not have access to QELNG IT Systems or QELNG E-mail accounts, from completing Annual Conflict of Interest Declarations if the agreements with the parent companies of such Contract Staff include appropriate contractual protections in favour of the Company to mitigate the risk of Conflict of Interest.

j) Annual Certification Statement – All Employees shall complete and submit annually within the Reporting Period, the Annual Certification Statement in (*Appendix 3B).* Company's Human Resources Department shall ensure that new Employees joining the Company sign the Annual Certification Statement at the time of joining and subsequently sign the Annual Certification Statements.

k) Prior Conflict of Interest Declaration - Employees shall declare any Conflict of Interest regarding their and their Family's interests, and to the best of their knowledge, their Extended Family's interests in Entities, to their line manager, Department Manager and Chief Officer, before commencing work on any business dealings, tenders or contracts for the Company involving such Entities.

l) Reporting to Line Management - Employees shall keep a record and inform in writing their line manager, Department Manager or Chief Officer of all Conflict of Interest situations including entertainment, gifts or other offers made, as and when they occur. If the Employee has any doubts about the appropriateness of a gift or entertainment, he must consult the ECIC for prior approval. This shall protect the Employee's interest if he is later accused of acting improperly. Any Prohibited Gifts or benefits offered, given or received that exceed the guidelines set forth in this Policy must be reported to the ECIC as soon as possible in the Conflict of Interest Declaration Form – (Appendix 3).

m) The ECIC will resolve any reported Conflict of Interest by assessing whether the conflict exists and recommending appropriate action.

2.5 PROMOTING A POSITIVE WORK ENVIRONMENT (DISCRIMINATION, HARASSMENT AND BULLYING FREE WORKPLACE)

Consistent with its covenants, the Company believes in a mutually supportive, respectful and productive work environment; and that its Employees are a valuable asset to be treated fairly. The Company is committed to providing an environment that enables all Employees to pursue their careers free from any form of discrimination, harassment and bullying.

Retaliation against or victimization of anyone who lodges a complaint in good faith will not be tolerated.

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2.5.1 DISCRIMINATION

The Company recruits its personnel solely on the basis of its requirements and the qualities of individual candidates relevant to the Company's needs. Neither the Company, any Employee, nor any person acting on behalf of the Company shall discriminate against any person with regard to employment or because of the race, religious beliefs, creed, color, sexual orientation, physical disability, mental disability, marital status, age, ancestry or place of origin. The foregoing requirement does not apply with respect to an Employee selection process based on a legitimate occupational business requirement and for hiring of Qatari Nationals. For further details please refer to the Company Employee Relations Policy (PPL-000-POL-003).

2.5.2 HARASSMENT AND BULLYING

Harassment may occur when the words, actions or behaviour of Employees create an intimidating, hostile or offensive work environment. This type of harassment can be destructive to a positive work environment and will not be tolerated. The Company does not allow any kind of bullying and harassment ,by or towards any Employees, business partners or communities.

Unwelcome sexual advances or other inappropriate personal conduct, which could reasonably be expected to make a person feel offended, humiliated or intimidated are prohibited. Sexual harassment may take many forms including but not limited to, overt advances to demeaning comments, jokes, language and gestures.

The Company does not tolerate abusive language, physical violence, or the threat of physical violence.

Please refer to the Company Employee Relation Policy (PPL-000-POL-003) for further details on the rules against bullying and harassment.

2.6 COMPLIANCE WITH LAWS AND REGULATIONS

It is the Company's policy to conduct its business in compliance with all laws, regulations and other legal requirements applicable to the Company in whatever jurisdiction the Company is doing business. The Company will also endeavor to ensure that its agents, partners and associates comply with such laws, regulations and other legal requirements in any jurisdiction in which they are working with or for the Company.

Employees shall take reasonable care to acquaint themselves with and to comply with all applicable laws, regulations and Company Policies and Procedures. Each Employee is charged with the responsibility of acquiring sufficient knowledge of the laws involved in each area relating to his or her particular duties in order to recognize potential dangers and to know when to seek the advice of in-house legal Department.

Unlawful acts or breaches of Company Policies or Procedures are not acceptable, whatever the jurisdiction. Good motives are not an excuse for committing illegal acts or breaches in Company Policies and Procedures.

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Under Qatari Law the Company is obligated to report to the appropriate State authority any breach of a Qatari law or regulation associated with any wrongdoing such as Employee fraud, theft, bribery and disclosure of confidential information as part of the larger investigative process.

2.7 POLITICAL ACTIVITIES

Political activities that Employees are prohibited from doing while acting on behalf of the Company include:

- Contributions of Company funds, cash or in-kind, or other resources in support of political activities, organizations, political candidates, parties or officials in the State of Qatar or anywhere else in the world, unless permitted by law and approved by the Board of Directors;
- Solicitation of political contributions from individual Employees;
- Political activity in the countries in which he/she is not entitled to exercise civic rights.

Contributions, donations or support to organizations that have social, cultural, educational or artistic missions are subject to applicable Laws.

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3 DISCIPLINARY ACCOUNTABILITY

Any violation of this Policy could lead to criminal or civil proceedings and / or disciplinary actions including termination of employment. The following list is indicative of some Policy violations, but is not exhaustive:

- Deliberately not reporting a violation of any law or of this Policy by an Employee or others;
- Knowingly authorizing or allowing violation of any law or this Policy;
- Retaliating or encouraging others to retaliate against an Employee who in good faith reports the violation of any law or this Policy.

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4 FINAL AUTHORITY

The Company's decision regarding any violation of this Policy shall be final and the Company reserves the right to take all such actions that in its judgment, will end any violation of this Policy.

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APPENDICES

- Appendix 1 – References and Relevant Documents
- Appendix 2 – Glossary of Terms: Definitions, Acronyms and Abbreviations
- Appendix 3 – Examples of Conflict of Interest and Forms
  - ➢ Appendix 3A – Conflict Of Interest Declarations – CLS-LEG-POL-001-F02 (Sample)
  - ➢ Appendix 3B – Annual Certification Statement – CLS-LEG-POL-001-F01 (Sample)

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APPENDIX 1 – REFERENCES AND RELEVANT DOCUMENTS

Number	Title
PPL-000-POL-003	Employee Relations
GEN-PRL-PRC-005	Corporate Communication
CLS-CFA-POL-001	Firewall Compliance
CLS-DDC-POL-001	Third Party Due Diligence Policy
PPL-RTL-POL-001	Recruitment and Placement
INF-000-POL-005	Acceptable Use of Information Systems Policy
INF-ISG-POL-004	IT Security
PPL-REW-POL-001	Business Travel Policy
PGS-CON-PRC-001	Non-Compliant Contractors
GEN-PRL-PRC-008	Social Investments
CAU-IAI-PRC-001	Conducting Internal Audit Investigations
CAU-AUD-PRC-002	Conducting Internal Audits

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APPENDIX 2 – GLOSSARY OF TERMS: DEFINITIONS, ACRONYMS AND ABBREVIATIONS

Term	Description
Company	shall refer to QatarEnergy LNG ("QELNG"), its subsidiaries and its operated ventures.
Contract Staff	refers to all persons placed with Company on a full or part time work under a personal or third-party services agreement for a term of twelve month or more and not included in Company's payroll.
ECIC	shall refer to the Ethics and Conflicts of Interest Committee, which is the authority for all matters related to implementation of this Policy. The constitution and the Terms of Reference of ECIC are provided in Appendix 2.
Employee(s)	Only for the purposes of this Policy, refers to all persons directly employed by the Company on indefinite contracts, definite contracts, secondment, and Contract Staff acting as workers or officials of the Company.
Extended Family	refers, in relation to an Employee, their parents-in-law, siblings-in-law, children-in-law and half-siblings.
Family	refers, in relation to an Employee, their first-degree family members namely, spouses, mothers, fathers, brothers, sisters and children.
Entity (ies)	refers to any person, organization, corporation, company, partnership, supplier, contractor, trust or estate other than the Company.
Material Interest	refers to a financial interest of any kind, which in view of all the circumstances, is substantial enough that it would affect a person's judgment or decision making with respect to QELNG business dealings with Entities. An ownership or interest is substantial if an ordinary prudent person in a like position would reasonably conclude that such an interest would affect judgment with respect to QELNG business dealings. Where material ownership is in doubt, it is presumed to exist.
Interest	includes: a. A direct or indirect Material Interest through ownership of the shares or equity, and/or other interest held by an Employee or his/her Family, or to the best of his/her knowledge his/her Extended Family, in an Entity doing business with the Company. b. A position held by the Employee acting in a capacity as sponsor, director, officer, partner, consultant, employee, distributor,

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Term	Description
	agent, trustee or the like for suppliers, contractors, subcontractors, customers or other Entities doing business with the Company.
Conflict of Interest	a) The existence of an Interest for an Employee in an Entity, having a business relationship with the Company, irrespective of the Department wherein the Employee may be working; or b) The existence of an Interest for an Employee in any commercial activity of the Company; or c) Where an Employee's position or authority may be used to influence or make decisions in respect of Company transactions or activities that may lead to any form of financial or personal gain for that Employee or for his or her Family, or to the best of his/her knowledge his/her Extended Family; or d) Situations in which financial or other personal considerations may compromise an Employee's impartiality and/or judgment in the performance of his/her duties for the Company.
Reporting Period	means the period announced by ECIC annually during which Employees shall complete and submit the Annual Certification Statement and Conflict of Interest Declarations.

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APPENDIX 3 – EXAMPLES OF CONFLICT OF INTEREST AND FORMS

EXAMPLES OF CONFLICT OF INTEREST

- Where an Employee's interest, holding, position or authority may be used to influence or make business decisions in respect of transactions or activities between the Company and a third party may lead to any form of financial or personal gain for that Employee or for his/her Family, or to the best of his knowledge, his/her Extended Family. (Accepting directly or indirectly, anything of value from that third party will impair impartiality);
- Situations in which financial or other personal considerations may compromise an Employee's impartiality and/or judgment in the performance of his/her duties for the Company;
- An Employee's use of confidential business information for personal or Family gain, or to the best of his/her knowledge the gain of his/her Extended Family;
- Acquiring or trading in interests connected with the manufacture, transportation or marketing of LNG or other commodities handled by the Company;
- Ownership of property that the Company leases;
- Soliciting gifts or accepting Prohibited Gifts or favors.

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APPENDIX 3A – CONFLICT OF INTEREST DECLARATIONS – CLS-LEG-POL-001-F01 (SAMPLE)

CONFLICT OF INTEREST DECLARATIONS

Classification: Internal

CLS-LEG-POL-001-F01
Form

PART A – GIFTS

You must complete this section if you were offered or accepted any Prohibited Gifts as defined below, even if you refused. ***Do not include Allowed Gifts.***
PROHIBITED GIFTS, include cash, shares, air tickets, hotel rooms, jewelry, furniture, interest-free loans, frequent meals, repairs of house or car, jobs for relations, use of hire cars, offices or apartments and similar gifts.
ALLOWED GIFTS include occasional, nominal gifts up to lesser of 2% of Employee's monthly salary or 400 QRS, such as calendar, sweets, pen, meal, testimonials (e.g., plaque at plant opening)

Name of Company & Person Offering Gift or Entertainment	Description of Gift or Entertainment	Estimate Value	Date	Accepted? Yes/No	Line Manager Notified	Manager Approval

PART B – EMPLOYEE AND FAMILY INTEREST IN COMPANIES DOING BUSINESS WITH QATARENERGY LNG

You must complete this section if you or any of your Family members (your spouse, children, parents, parents in law, brothers or sisters or their spouses, half-brothers, half-sisters, sons, and daughters in laws) held any interest during the year (including sponsorship) in any business that sells services or equipment to or buys products from QatarEnergy LNG

Company Name	Relationship to Family Member Holding an Interest (Self, brother, father, spouse, etc.)	Type of Interest (Position, partner, shares, loan, sponsor etc.)	Type of Business (Vendor, contractor landlord, sponsor, etc.)	Name of Sponsored Companies

PART C – RELATIVE WORKING FOR QATARENERGY LNG

You must complete this section if any of your Family members (your spouse, children, parents, parents in law, brothers or sisters or their spouses, half-brothers, half-sisters, sons, and daughters in laws) works for QatarEnergy LNG.

Name of Relative and Position title	Staff number	Relationship (spouse, brother, etc.)	Department	Group

PART D – EMPLOYMENT POSITION OUTSIDE QATARENERGY LNG

You must complete this section if you hold any paid or unpaid employment outside QatarEnergy LNG, except unpaid work for a registered charity.

Company Name	Job Title (Board Member, Manager, etc.)	Description of Duties

I declare that I have read, understand, and will comply with QatarEnergy LNG's Code of Business Ethics and Conflict of Interest Policy, and that the information given in this declaration is true and complete.

Name: _____

Staff number: _____

Department and Position Title: _____

Signature: _____

Date: _____

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Note: The printed/exported document CLS-LEG-POL-001 out of AIMS is considered uncontrolled.

APPENDIX 3B – ANNUAL CERTIFICATION STATEMENT – CLS-LEG-POL-001-F02 (SAMPLE)

Code of Business Ethics Annual Certification Statement

I hereby certify that I have read and understood the information set forth in The Code of Business Ethics Policy and have complied with the principles of such Policy in my daily work activities. I will comply with and will not be involved in any violation of the Policy.

Title of the Procedure	Procedure No	Revision	Company
Code of Business Ethics Policy	CLS-LEG-POL-001	08	QatarEnergy LNG

Name: _____

Staff No.: _____

Department: _____

Position Title: _____

Signature: _____

Date: _____

Note: The printed/exported document CLS-LEG-POL-001 out of AIMS is considered uncontrolled.