

**Qatari Diar Real Estate Investment Company**



## **Code of Conduct**

**Version 2.0**  
**Approved by the Board**  
**Resolution No. (53/2) of 2015**



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### INTRODUCTION

Qatari Diar Real Estate Investment Company (hereinafter “Qatari Diar” or “the Company” or “QDREIC”) Code of Conduct (also **known** as Code of Ethics) is a guidance resource to assist all Qatari Diar employees (including personnel of Qatari Diar affiliated entities) in making decisions and choosing actions with:

- ▶ Confidence that the decision conforms to Qatari Diar’s ethical standards and expectations; and,
- ▶ Comfort that the decision meets the expectation of “doing the thing right at first time”.

Qatari Diar’s Code of Conduct defines the conduct principles of **Responsibility & Accountability, Respect, Integrity, Conflict of Interest, Excellence, Sustainability, Transparency & Confidentiality and Compliance & Discipline.**

Additionally, this Code defines actions that respectively should and should not be taken by employees.

- ▶ Each ethical principle is first defined; and,
- ▶ The definition is followed with a series of focus area guidelines – a list of actions and decisions that are consistent with the stated principles.

Key Messages:

- Employees must follow all the principles as mentioned in this Code of Conduct
- The Code of Conduct sign off is mandatory and unacceptance may lead to disciplinary action
- All policies & procedures are available on the QD Intranet for reference

The guidelines are illustrative and are not intended to suggest that they fully define all ways applicable for ethical principles that might apply. In several instances, there are policies and procedures that address more detailed aspects of the issue(s) being discussed.

All employees should refer to Qatari Diar’s **Corporate Governance Policies** for additional details. For any conflicts of interpretation of the applicable code, the Corporate Governance Policies shall take precedence.

All employees should be aware that policies, procedures, laws and regulations may change at any time. It is an employee’s responsibility to ascertain, when relying on policies, procedures, laws and regulations that only the most updated information is referred and followed.

Qatari Diar is fully committed to its Code of Conduct and will take action to protect its interests and that of its employees. Violation of the code may lead to disciplinary action and may even result in termination of employment in cases of serious irrevocable violations of the Code. The Audit & Risk Committee of Qatari Diar shall review any violations of the Code and decide on the action accordingly.



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The Board of Directors or the Chairman shall review and reassess the adequacy of this Code annually, and make any amendments to the Code that is deemed appropriate.

All Employees are required to report infringements of these ethical guidelines or principles. Generally speaking, the first person they should consult is their direct line manager. Employees who would prefer not to turn to their line manager can call:

### **Qatari Diar whistle-blowing hotline**

**Telephone +974 44974114**

Alternatively, the employee can send an email to:

[compliance@qataridiar.com](mailto:compliance@qataridiar.com). (This can also be done anonymously.)

No employee may be disadvantaged at Qatari Diar as a result of acting in accordance with legal stipulations or the principles laid down in this Code of Conduct. All notifications are treated strictly confidentially unless legal considerations necessitate another course of action.



## **PRINCIPLE 1: RESPONSIBILITY & ACCOUNTABILITY**

### **Definition**

Responsibility is the ability to act and complete the task without guidance or superior authority. Responsibility may be shared between one or more individuals.

Being Accountable not only means being responsible, but also being ultimately answerable to actions. Accountability cannot be shared; only one employee can be assigned to an action.

### **Key Messages:**

- Each employee should know their responsibility and accountability by referring to respective job descriptions.
- Each employee is responsible towards the Health, Safety and Environment related tasks
- Should an employee hear about process gaps from internal / external stakeholders; an employee should raise the matter in QD to resolve and improve the QD Brand.

### **Guidelines**

#### Leadership:

- In leadership roles, accountability is the acknowledgment and assumption of responsibility for services, properties and products offered, actions taken, decisions made, and policies of the Company complied.
- All employees must take the initiative to lead and utilize all resources under their disposal to enhance Qatari Diar's success. As a leader of resources, an employee is accountable for the overall performance of the resources within his/her delegated authority.

#### Shared Responsibility:

- Qatari Diar's Board is accountable to its shareholder(s) and the management is accountable to the Board. Management then delegates its responsibilities to the employees of the company. As such, the accountability cascades down to all Qatari Diar employees to ensure the success of the organization and to increase its value as expected by the shareholder(s). All employees must share the sense of ownership for company performance.

#### Personal Responsibility:

- Each employee in a supervisory position should ensure that the performance of subordinates is assessed in an honest, fair and objective manner. Credit is provided for exemplary performance of subordinate, as and where needed.



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- Employees should be aware of the formal disciplinary process which has defined the penalties and punishment for every violation. For this, one should refer to the **Table of Offences and Penalties** which is detailed in the **Human Resources Policies and Procedures**.

### Policy Compliance:

Employees are responsible to carry out and comply with the QDREIC policies and procedures, and Qatar legislation. It is acknowledged that employee views, on particular matters, may differ from QDREIC; however such views must not either interfere with the performance of an employee's duty or prevent the employee from supporting QDREIC's objectives.



### PRINCIPLE 2: RESPECT

#### Definition:

Respect calls on us to recognize each individual's inherent worth, and the unique contributions s/he can make. This includes creating a working environment that embraces diversity and fairness, and excludes discrimination and harassment. Employees are entitled to expect fair treatment at Qatari Diar and are expected to treat others fairly. This also requires employees to conduct Qatari Diar's business as such that its reputation for fair dealings is sustained and enhanced.

Respect does not require that we always agree with others, but it does require that we listen without prejudging and/or prejudice. Respect calls for us to encourage others to express their views and to accept those views as legitimate, even when we choose to disagree. Employees are expected to respect their colleagues, customers and others with whom they interact in their professional capacity.

#### Key Messages:

Employees should promote respect through:

##### Respectful Communication:

- Qatari Diar wishes to maintain an environment conducive to inter-group communications, sharing of ideas and resources for the furtherance of Qatari Diar's goals and objectives. Qatari Diar desires for its employees to be actively involved and provide suggestions, all employees should respect the ideas of others, listen without prejudice, and provide constructive feedback and support in implementing any new ideas.

##### Embrace Diversity:

- Qatari Diar and its affiliated entities employ people from diverse cultural and ethnical backgrounds. Building on each other's diversity, backgrounds and skills can lead to the development of new ideas. As an employee of Qatari Diar, one should respect his/her colleagues and customers and treat everyone professionally and fairly.

##### Avoid Discrimination and Harassment:

- Employees must treat their customers, colleagues and the public parties with utmost respect and dignity. Employees are further encouraged to respond courteously to inquiries from others and provide timely and appropriate responses to inquiries/ complaints from others.
- Employees must always be polite and respect others' opinions and should aim to create a friendly and conducive environment. There will be no tolerance for discrimination or harassment by any Qatari Diar employee. Any violations will result in penalties or may lead to termination of employment.
- Employees in supervisory roles should distribute work equitably without favoritism or discrimination and ensure that subordinates are provided with the right tools and information for completion of tasks.



### Avoid Bullying:

Bullying is unreasonable behaviour that is directed against an individual or group by another individual or group and is derived from the misuse of power over the target of the behaviour.

Bullying is unacceptable conduct within QDREIC and all reported incidents will be investigated.

Whilst it is the responsibility of all employees within QDREIC to ensure that premises and facilities are free from harassment, managers have a particular and clear responsibility to meet this requirement. Managers who become aware of serious breaches of policy must immediately notify their superior or the HR Director.



## **PRINCIPLE 3: INTEGRITY**

### **Definition:**

Integrity encompasses honesty, truthfulness and transparency. Honesty begins with telling the truth, it also obligates us to be transparent in all of our business dealings, and to operate in good faith – free from any attempt at deception or deceit. Employees are expected to be frank, candid and open in their communications and dealings with others – be their subordinates, managers, vendors, suppliers, partners, customers or the community. Our commitment to integrity also presumes that employees will be truthful in their dealings with each other even when doing so might be difficult, as when one might disagree with or need to provide constructive criticism to a colleague.

### **Key Message:**

- Take charge; always do the right thing no matter what
- Employees can conduct personal transactions based on the guidelines mentioned below
- Any gifts and bribery should be avoided
- Employees are expected to respect ethical conduct and avoid misuse of company resources

### **Guidelines:**

#### *Personal Transactions:*

- Persons connected with the Company include the Board of Directors, Officers, Employees, Consultants and their respective dependents. Unpublished price sensitive information can be defined as information relating to the Company, which has not yet been made available publicly, but which information when made available publicly, can materially impact the price of the company's assets. Examples of nonpublic or inside information include knowledge about unannounced marketing plans, new product releases, financial data or business strategies.
- It is prohibited for an insider to communicate unpublished price sensitive information relating to the Company, to any person, even if the employee does not gain financially as a result of his/her actions. Any communication required to be made in the ordinary course of business or profession or employment, or under any law, is however outside the scope of this prohibition.
- Personal transactions denotes buying or selling the assets of the Company by persons connected with the Company, while they are in possession of or having access to unpublished price sensitive information. All employees (including the Chairman and the Board of Directors of QDREIC & its' direct subsidiaries (100% owned) and affiliates must refrain from conducting a personal business transaction directly or indirectly with the Companies. Transactions such as buying or renting non real estate products marketed at published price and publicly offered by Qatari Diar or any of its subsidiary and affiliates are acceptable and may not be perceived as a conflict.



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- In case of purchasing real estate units from 100% owned subsidiaries, Joint Ventures or affiliate, following criteria applies:
  - Purchase of QD property from the market (without discount):
    - All the employees including Board members of QDREIC & its' direct subsidiaries (100% owned) or JVs can purchase unlimited unit(s) from QDREIC after the first day of sales in the open market.
    - No advance reservations or favoritism should be entertained to buy the properties
  - Purchase of QD property (with discount):
    - Discount rates for all the units offered by Qatari Diar, subsidiaries, JVs or affiliates should be approved by the Qatari Diar Board of Directors in advance
    - Employees may reserve a unit only after it has been launched in the market
    - Sales would be limited to one apartment/house/villa or plot of land per staff member during the employment period with Qatari Diar or any of its affiliates (including subsidiaries and JVs)
- Personal Transactions can result in certain persons gaining at the expense of others, by virtue of their possession of unpublished price sensitive information. This may result in undermining investor confidence and may have an adverse impact.

### Use of Company Resources:

- Company time, funds and property must be used for Qatari Diar business purposes only, unless otherwise approved by the appropriate authority. Use of Qatari Diar resources, e.g. company telephones, copiers, fax machines, email and internet access, should only be used for Qatari Diar business purposes.
- Employees with access to company computers are expected to limit their use to company business purposes only – unless otherwise authorized by their supervisors.
- Personal use of computers, if approved, must be limited to reasonable usage and may not include access to, receipt or transmission of inappropriate material, text, images or files.

### Gifts, Gratuities, Entertainment or Other Solicitations:

- The payment of bribes or facilitating payments is not allowed under any circumstances. Qatari Diar employees should not accept any bribe or facilitate payment of such.
- Employees of Qatari Diar are not to solicit gifts or entertainment from prospective or current customers, vendors or any other individual or business. Accepting a gift, even of nominal value, which is likely to improperly influence the employee in the discharge of his/ her responsibilities is not allowed and may lead to disciplinary action.
- Employees may occasionally be offered gifts and/or entertainment by suppliers or customers. The general rule in this respect is that gifts and entertainment should be refused tactfully, unless such gift is clearly of nominal value. Nominal value is considered to be anything below QAR 1,000. Gifts and gratuities received from external parties exceeding a value of QAR 1,000 should be immediately reported to the Risk & Planning Department



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for advice of disposition and/or action(s) to be taken. Allowed gifts include occasional, nominal gifts, such as merchandising items, food and beverages, calendars, and testimonials. Generally prohibited gifts are but not limited to gifts in the form of cash, securities, air tickets, loans at preferred conditions or jobs for relations.

- Employees also should not offer any gift, gratuity or entertainment to any vendor, supplier, agent, partner, customer or other intended party (or which could reasonably be perceived as intended) to influence any business decision.

### Bribery and Corruption:

A "bribe" is not just limited to payments of money. Gifts or lavish hospitality could also amount to bribes in certain circumstances. As a result, it is critical that all employees also to be fully aware of Qatari Diar's **Gifts, Corporate Hospitality and Expenses Policy**.

Set out below are some rules that employee must follow during his/ her employment with QDREIC:

- Employees must not promise, offer or give a bribe to anybody for any purpose.
- Employees must not request, agree to receive or receive a bribe.
- In particular, employees must not promise, offer or give a bribe to a foreign public official in an effort to obtain or to retain business for QDREIC.

If anyone at QDREIC is found to have given or received a bribe, they could be punished, terminated and/or reported to the relevant authorities for imprisonment in cases of serious irrevocable violations of the Code.

QDREIC could also be seriously damaged by any instances of bribery. The consequences could be:

- Prosecution and an unlimited fine;
- Financial costs and wasted management time in dealing with an investigation;
- A potential bar to tendering for government contracts; and,
- Negative publicity that could affect severely the Company's financial performance and business reputation.

### Truthfulness:

- All employees of Qatari Diar must be honest, open and forthright in all their business dealings and activities.
- Employees must maintain honest and accurate records of:
  - Time reporting;
  - Expense reporting; and,
  - Financial and accounting records.
- Employees must be honest about their qualifications, and other circumstantial data.
- Employees must honor contracts, agreements, promises and company assigned responsibilities.



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- Employees should ensure that all electronic and physical data in their possession is fully secured at all times.

### Openness:

- Employees are expected to provide appropriate encouragement and constructive criticism. Such communication should be clear, constructive and sufficiently detailed as to be useful to the other party. Encouragement and criticism should be 'two-way', freely exchanged among peers and between supervisors and their subordinates.

### Laws and Regulations:

- Employees shall acquire adequate knowledge of and shall comply with all applicable laws, rules and regulations of the respective countries where Qatari Diar operates currently as well as in the future.
- Employees shall not knowingly participate in, assist or conceal any acts or violations of any applicable law, rule, or regulation.
- Employees should consult with the HR Department or their immediate supervisor if they have any questions or concerns about conditions of employment and/or corporate policies or procedures.

### Working Hours:

QDREIC has established work schedules that meet its operational requirements and conform to the provisions of the Qatar Labor Law or any other applicable labor law as dictated by the jurisdiction where Qatari Diar operates. All employees are expected to respect the working hours and should be punctual and regular in their attendance.

### Professional Conduct:

QDREIC is committed to the highest standards of ethical conduct in its business dealings and complies with all applicable government laws, regulations and codes wherever it conducts business. Employees are expected to fully understand how their activities affect the company's operations and reflect on its reputation. High standards of professional integrity must be followed at all times.

### External Employment:

- QDREIC employees are not allowed to work for another employer either for profit or non-profit after official work hours without written permission from the HR Director.
- Unpaid volunteer work for known charity organizations is allowed provided it does not affect the Employee's performance with the company.



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- Participation either directly or indirectly with any official entity or organization when its interest contradicts with the interest of QDREIC or is related to Company business is not allowed.

### Electronic Information and Email Policy;

Employees must not access any electronic information which they are not authorized to access or use, and must not allow any other person access for any reason. Employees must take all reasonable precautions, including password maintenance and file protection measures to prevent unauthorized access and have an obligation to maintain the security and confidentiality of the information systems over which they have responsibility or control and that are owned or used by agreement. Email must be used in the same way as other business correspondence and with the same duty of care. The content of emails must not violate QDREIC's ethical standards; have harassing, discriminative or otherwise inappropriate content. Employees should assume that any email that is being sent is a permanent record that may be relevant in the event of a lawsuit.

### Records Management:

Employees need to be aware of their record keeping responsibilities and are reminded that there is a legal requirement to adhere to proper records management practices and procedures.

All employees must therefore ensure that QDREIC documents are not placed in unofficial or private filing systems but place such documents in official files.

Employees must not remove documents from official files. These are controlled records, and must be complete, up-to-date and capable of providing organizational accountability when officially scrutinized.

Employees must not damage, dispose of, or in any other manner, interfere with official documents or files. The destruction of records may only take place in accordance with a disposal and retention policy. As QDREIC established legal entities for its investments in jurisdictions all over the world, it needs to consider international laws and regulations in addition to local Qatari ones.



## **PRINCIPLE 4: CONFLICT OF INTEREST**

The Board acknowledges the risk that conflicts of interest may arise in obtaining persons involved in the business and civic community to act as Directors, Executives, and employees of Qatari Diar. Because of such persons' worth in attracting and maintaining business relationships, the Board feels it is prudent to adopt a conflict of interest policy. In recognizing that excessive activities, gratuities and access to information may lead to conflicts of interest for employees, directors, and principal shareholder(s), Qatari Diar has developed this policy to recognize such positions and to prevent a loss of objectivity by requiring appropriate and trustworthy conduct.

### **Key Message:**

- Employees must declare any existing or potential conflicts of interests that may have an impact on QD group of companies. The declaration should be done annually, or as and when the situation changes.
- An employee should avoid conducting business for Qatari Diar with his/her own family members (up to 1st degree (parents, spouses, children)) or with a business in which a family member/employee is associated in any significant role (such as owner, partner, etc.)
- An employee or family members up to 1st degree shall not render services in any capacity, such as director, officer, employee or consultant to any person or organization doing or seeking to do business with Qatari Diar, or is in any way competitive with Qatari Diar.

### **Guidelines:**

- Employees must exercise due caution when making business decisions that there is no conflict (either real or perceived) between their personal interest and their obligations to and / or the interest of Qatari Diar.
- No employee shall be involved in a situation where his/ her personal interests might conflict with the interests of the organization. Qatari Diar recognizes and respects the right of the individual to invest or participate in outside activities, provided they do not interfere with or restricts the effectiveness of the employee's job performance. Specific prior written approval needs to be sought from GCEO or Chairman if an employee or a Board's director is to acquire any significant financial interest, directly or indirectly, in a privately owned business entity that does, or seeks to do, business with Qatari Diar.
- Although it is impossible to set forth all possible situations, which might arise, the following is a non-exhaustive list of examples of conflicts of interest that may occur:
  - An employee involved in the selection of, negotiations with, any person or organization doing or seeking to do business with Qatari Diar, shall not own any direct or indirect interest in or receive any direct or indirect benefit from such person or organization.
  - An employee shall not borrow money from any person or organization doing or seeking to do business with Qatari Diar (other than banks or other lending institutions in the ordinary course of business).
  - An employee or their family members (up to 1<sup>st</sup> degree) shall not render services in any capacity, such as director, officer, employee, or consultant, to any person or organization doing or seeking to do business with Qatari Diar, or is in any way competitive with Qatari Diar.
  - Political or social activity which conflicts with Qatari Diar business goals is not permitted.



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- As a general rule, an employee should avoid conducting business for Qatari Diar with his/her own family members (up to 1<sup>st</sup> degree) or with a business in which a family member is associated with any significant role. If such a transaction is unavoidable, the employee must obtain prior written approval from the Qatari Diar's Board. Any dealings with a related party/ affiliate should be conducted in such a way that no preferential treatment is given to this business that would not otherwise be given to another business.

Refer to CGV 5.0 Conflict of Interest policy under Corporate Governance for further information.



## **PRINCIPLE 5: EXCELLENCE**

### **Definition:**

Excellence is working towards the highest standards of performance. It governs both the outcomes and the processes needed to attain the best possible results. Excellence requires one to make a quality effort, follow all applicable standards and achieve the best results. Employees are expected to do the best they can do, every time, even when no one is watching or when the outcome is not related to a 'critical' or measurable result.

### **Key Message:**

- Optimize performance, do it right the first time.
- Every employee should make an effort to achieve highest standard of performance in a consistent manner by:
  - Improving their technical and professional competence
  - Respecting work environment
  - Achieving quality of work and services in consistent way

### **Guidelines:**

#### Technical and Professional Competence:

- All employees of Qatari Diar are encouraged to seek and apply new knowledge and skills in ways that improve their ability to perform current duties and aspire to perform additional duties.
- Employees should attend personal and professional development training and other such events as appropriate.
- All employees are encouraged to attain professional certifications related to their area of work.

#### Work Environment:

- Employees will, at all times, set a good example and be role models for commitment, customer focus and team work.

#### Quality of Work and Service:

- Employees must strive to provide customers, colleagues and the public entities with high quality services in line with best industry standards.
- Employees are encouraged to improve quality, productivity and service by providing ideas and suggestions to the ways things have traditionally been done.

#### Occupational Health & Safety:



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QDREIC is committed to providing a safe and healthy workplace for all employees and visitors. However, employees have a responsibility to make the workplace a safe and healthy place for all concerned, as far as reasonably practical.

It is therefore important that employees are familiar with the safety and health standards or procedures in their particular area of work. If employees have not been advised of these standards or procedures during the induction process, they must as a matter of urgency ask their immediate manager to obtain the necessary information.



## PRINCIPLE 6: SUSTAINABILITY

### Definition:

Sustainability of Qatari Diar means ensuring the long term viability of Qatari Diar and its affiliated entities by optimizing all business needs without having an effect on Qatari Diar's strategic goals..

### Key Messages:

- Develop, implement and follow key strategies to fulfill the vision and mission
- Achieve sustainability by:
  - Generating profit for sustainable growth
  - Meeting the requirements and expectation of key stakeholders
  - Applying HSE principles to the development and create eco-friendly communities

### Guidelines:

#### Stakeholder Expectations:

- Qatari Diar will always exert its fullest effort to maintain activities within the company's direction taking into consideration political and socially responsible factors in addition to commercial aspects. Employees are encouraged to take part in socially responsible actions and support Qatari Diar in meeting its commitments.
- Qatari Diar will follow efficient yet controlled procedure to seek investment opportunities that serve the company's objectives. Qatari Diar employees will strive to be proactive to the effects of macro-economic factor changes in the markets it is operating in, to minimize the risks to its investments and work in good faith and honesty with regard to maintaining healthy, commercial, social and political value to its shareholder(s).
- Qatari Diar and its employees are committed to ensuring socially responsible initiatives are in place including environmental and health, education and youth related aspects. Qatari Diar's commitment is also to ensure that all people including customers, partners, employees, shareholder(s) and other community members, in all countries that the company operates in, are treated with respect and as key partners to its success.

#### Accounting and Internal Controls:

- Qatari Diar recognizes the importance of true and fair recording and disclosure of its financial accounts. Fair and accurate books and records are essential for managing Qatari Diar's business and maintaining accuracy and integrity of the Company's financial reporting and disclosure. Any attempt to conceal or misstate information by employees in company records will be considered as a serious offense and may result in disciplinary action and criminal prosecutions. All employees are responsible for reporting any violation of **Qatari Diar's Accounting Policies and Procedures**.



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- The internal controls are embedded in the day to day activities of Qatari Diar, through policies, procedures and financial and operational authorities of the Company. All employees should understand the internal controls relevant to their position and follow the policies and procedures related to these controls.

### Audits:

- Internal and External audits help ensure compliance to regulations, laws, leading practice and Qatari Diar's policies and procedures. Furthermore, audits help identify potential weaknesses and opportunities for improvements so that they may be dealt with and corrected promptly. Qatari Diar employees are required to cooperate fully with internal and external auditors, by providing clear and truthful information during audit process.



## PRINCIPLE 7: TRANSPARENCY & CONFIDENTIALITY

### Definition:

Access to information and data is given only to the authorized personnel in the Company and the affiliated entities. It encompasses the avoidance/prevention of misuse and misappropriation of Company data and resources, and protects Company rights and proprietary information. Transparency & Confidentiality applies to Internal & External stakeholders and can be summarized as following:

	Internal	External
<b>Transparency</b>	Sharing information with employees and stakeholders, e.g. project development status	Providing reports to government, Board, Shareholders e.g. financials, development status
<b>Confidentiality</b>	Restrict information sharing to limited employees e.g. payroll related information	Declaring unauthorized information to 3rd parties e.g. sales launch price

### Key Message:

- Understand the difference between Transparency & Confidentiality
- Information may be shared internally or externally only with authorized party
- Public conduct & media contact – Permission to speak with media should be with authorized personnel

### Guidelines:

#### Proprietary and Insider Information:

- The misuse of proprietary information is as serious an offence as stealing tangible Company property. This includes ‘confidential information’ that is generally not known or shared with the public.
- Employees will not provide confidential or proprietary Company information to unauthorized persons such as competitors, suppliers, and media or outside contractors without proper authorization. This includes financial information, contractor/vendor lists, contractual clauses, discounts and special rates, computer programs, as well as descriptions of Company processes or operations. Employees should ensure appropriate **non-disclosure agreements** are in place with external parties, whenever applicable.
- Employees will not discuss potential business relationships, purchases, mergers or acquisitions or other organizational changes either internally or with unauthorized third parties except on a “need to know” basis.



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- Qatari Diar's information and communication systems, including connections to the Internet, are for the use of business purposes only. Employees can use them for conducting business or for other incidental purposes authorized by the management or by the applicable Qatari Diar guidelines. System security should be considered when sending confidential information.
- All employees are personally responsible for protecting Qatari Diar's property (information and physical) entrusted to them. Employees should ensure that all electronic and physical data in their possession is fully secured at all times.
- All employees should be aware of the information falling under proprietary and insider information. Disclosing this information will lead to disciplinary action and possibly criminal prosecution as per the type of information shared.

### Stakeholder Information:

- Qatari Diar will take precautions to avoid improper, inappropriate or inadvertent disclosures of sensitive, confidential or privileged information, records or documents related to all its stakeholders. Within Qatari Diar, employees will share information only with those who have a "need to know" the relevant information. Qatari Diar will maintain and protect business partners' information even after termination of the relationship with that company.

### Employee Information and Privacy:

- Qatari Diar recognizes the obligation to protect the confidential information of its employees both inside and outside of the Company. Information about employees, such as salary, ID and passport numbers, age, status, type of leave, banking or other financial information should not be shared with third parties unless required for Company operations.
- Personal items, messages or information that are considered private should not be placed or kept anywhere in the workplace. Electronic files stored in Qatari Diar's servers are considered company assets and may be accessed by IT personnel in the performance of their duties, therefore employees should refrain from using company computers for any document for which they wish to keep private. Employees should respect other employees' workspace and data and should not access the same without prior approval from management.
- Qatari Diar has established open whistle-blowing channels for employees to raise concerns. The Board and Management are committed to protecting the confidentiality of whistle blowers and have set mechanisms to ensure whistle-blower identity is not released.

### Public Conduct and Media Contact:

Employees making comments in a public forum on any matter relating to QDREIC must act in a way that is in keeping with the company values and protecting the reputation of QDREIC. Only authorized personnel may speak with the media on behalf of QDREIC. Employees are not permitted to speak with media representatives without obtaining prior official approval of Corporate Communications



## **PRINCIPLE 8: DISCIPLINE**

### **Definition:**

Discipline in the workplace is the means by which supervisory personnel correct behavioral deficiencies and ensure adherence to established company rules. The purpose of discipline is correct behavior. It is not designed to punish or embarrass an employee.

In general, discipline should be restricted to the issuing of letters of warning, letters of suspensions, or actual termination. Employers should refrain from “disciplining” employees by such methods as altering work schedules, assigning an employee to do unpleasant work, or denying vacation requests.

### **Key messages:**

- Employees must adhere to company rules & policies and promote good ethics
- Disciplinary policy is available on QD Intranet under HR Section
- Compliance to be monitored through internal & external audits

### **Guidelines:**

#### Employee Dress Code & Appearance:

QDREIC is a well-recognised and respected organization that projects a particular image to our clients. Employees must therefore ensure that their appearance is neat, clean and appropriate for their particular area of work. A high standard of personal hygiene is expected at all times.

- QDREIC is committed to maintaining the highest possible professional image and expects Employees to dress conservatively.
- Work attire must support an environment that reflects a professionally operated organization.
- Tight and form revealing clothing must not be worn.
- For security reasons, Company Identification Cards must be carried at all times.

#### Male Staff:

- National Employees may choose to wear national dress.
- Expatriate male administrative and technical staff will wear a business shirt with tie.
- National dress or a business suit and tie are required for receiving official company visitors, for attending public meetings and outside appointments.
- Jeans, shorts and sports shoes are not permissible.



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### Female Staff:

- Female Employees may choose to wear appropriate national dress.
- Administrative and technical staff will wear dresses or skirts to below the knee.
- Jeans, shorts and sports shoes are not permissible.
- Blouses are to have a modest neck line and be no less than half-sleeve.
- A blouse with loose fitting slacks or business pant suits is acceptable.
- Clothing must be modest and of a professional style.
- Make up is to be modest.
- Large accessories and large earrings are not permitted.

### Drugs & Alcohol:

The use of illegal drugs and alcohol at work is inconsistent with the behavior expected from the Company's employees and is against the Qatari Law. Illegal drugs and alcohol are not permitted on Company premises. QDREIC is committed to the development and maintenance of a safe and healthy workplace free of drugs and alcohol and in compliance with the law. Reporting for duty or performing work while impaired by the influence of drugs or alcohol is not permitted.

### Smoking:

Passive smoking can impact on other employees, the community and create a poor image of QDREIC, which does not promote or encourage smoking. Smoking is not permitted in QDREIC owned or leased vehicles or buildings. Smoking will only be permitted in designated outdoor areas. Employees and visitors must properly dispose of smoking litter in the receptacles provided. Any violation of this policy will result in the employee receiving a Written Warning.

### Restrictions:

Employees are prohibited from the following:

- Engaging in prohibited political activities or joining prohibited groups or organizations.
- Discussing political matters or religious beliefs during working hours or in Company offices.
- Keeping official documents in their possession which should be kept in Company files. It is prohibited to remove such documents from files other than when undertaking normal duties.
- Disseminating or encouraging the dissemination of rumours.



### Gross Misconduct:

- Gross misconduct is a very serious offence that effectively breaches the contract of employment and justifies QDREIC to take immediate disciplinary action.
- While it is possible to give examples of actions which may constitute gross misconduct, each case must be considered in the light of its particular circumstances.
- Gross misconduct may result in termination of employment without notice.
- In the event of an Employee committing misconduct, the following disciplinary actions may be taken depending on the nature and seriousness of the violation or misconduct and the implicated consequences:
  - Verbal warning;
  - A first written warning;
  - A second written warning;
  - Salary deduction to cover the cost of any damage caused;
  - Delay of promotion, though the promotion may not be delayed for more than one (1) year;
  - Suspension from duties with loss of pay;
  - A final written warning;
  - Dismissal from work; and,
  - Dismissal from work and not paying end of service benefits.

### Grievance Handling:

- QDREIC supports the right of its employees to voice a grievance. A grievance refers to any complaint, concern, problem or dispute an employee has in relation to any employment related or workplace related matter. QDREIC provides a strong grievance policy and procedure to assist employees to give voice to their grievance.
- The QDREIC Intranet provides a guideline to employees on common employment and work place grievance issues, and the procedures for solving them.
- It is preferred that all grievances be solved informally, before formally proceeding through the Grievance Procedures.
- No Employee shall suffer from any unfair treatment because of the fact that s/he has presented a grievance or complaint under the provisions of this policy.
- Employees should be encouraged to voice grievances through the grievance handling procedures. The objective should be to resolve the problems at the earliest stage.



## Qatari Diar Group Code of Conduct

- Management will take severe actions against the employee if the grievance contains false accusations or is intentionally defamatory to QDREIC, his/her superiors or colleagues.
- All grievances are treated as highly confidential and must not be discussed with third parties other than those involved in the grievance procedure.
- Employees have the right to be accompanied by a fellow employee of their choice or a legal representative for moral support/to act as a witness if the need arises.
- The Grievance Committee consists of 3 to 5 members from Managerial level or above, along with the HR Director. The selection of the committee is done by the HR Director depending on the position of the Grievant and the severity of the grievance.

### Breaches of the Code:

QDREIC is committed to the standards set out in the Employee Code of Conduct. Where a breach of the Code has been identified by QDREIC a response to the breach may result in:

- Counselling;
- Disciplinary action;
- Termination of employment;
- Suspension; or,
- Criminal charges or civil action.