



NBK GROUP

CODE OF ETHICS

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Message from the Chairman



In the early 1950s, our Company was founded by my father, the late Sheikh Nasser Bin Khaled Al-Thani, with a very clear Vision: to establish a world-class company in which entrepreneurial excellence was the norm, and where innovative and ethical business practices would benefit not only its individual customers, but also the State of Qatar.

In the decades which have followed, NBK has achieved more than just astounding commercial success, but has earned unprecedented levels of credibility and trust among its clients in Qatar and beyond. Our company also upholds a core philosophy that is based on innovation, transparency, hard work and persistence with regards to our local and international stakeholders. NBK's new Code of Ethics is designed to play its role in maintaining these values and principles.

This Code of Ethics applies to all NBK employees, as well as suppliers who do business with our Company, in order to ensure that business is conducted to the highest ethical standards. It also provides a direction for business conduct which sustains and promotes a culture of ethical integrity, strong teamwork and high productivity.

I am confident that the NBK Group will continue to expand our scope of businesses, meet our upcoming challenges, deepen our contribution to the community and, supported by this Code of Ethics, continue to strengthen our reputable standing.

Nawaf Nasser Bin Khaled Al-Thani
Chairman

Our Code of Ethics

Philosophy

NBK is committed to the highest level of ethical behavior in its dealings with people, organizations and governments wherever it conducts business.

Our reputation is fundamental to our business and the core values from which our industry prevails. NBK cares about how it conducts business and so will not compromise its ethics and integrity for any reason, including the achievement of business results.

Purpose

The Code of Ethics (the “**Code**”) defines what we expect from you. It is your responsibility to know and understand the policies and standards that define our way of doing business.

The purpose of this Code is to ensure that all NBK employees, contractors and business associates comply with applicable laws and conduct business according to the highest ethical standards. It provides direction for business conduct which sustains and promotes a culture of ethical integrity, and cultivates strong teamwork and productivity. Attention to ethics in the workplace enhances the Company's reputation for honesty, integrity and reliability as well as assists in the management of values associated with quality management and strategic planning.

No code can address every possible situation. Where a specific act is not mentioned or you are not sure what action to take, you should always seek guidance.

Ask questions

Reading the Code should allow you to handle most situations. However, if you have a question about business conduct, do not hesitate to ask.

There are several sources of information or advice, including:

- your line manager
- the Legal and Compliance Office,
- the Human Resources Department, and
- the Ethics Committee

Violating the Code

Violating the Code can have serious consequences. These might be fines or other legal penalties, damage to our reputation, or the loss of trust, customers, profits and the loyalty of our people and communities.

If you violate the Code – or knowingly allow someone to do so – we will take disciplinary action which may lead to your dismissal and, if appropriate, criminal proceedings.

Ethics Committee

The Ethics Committee is responsible for monitoring ethical issues and dealing with them as they arise and taking appropriate actions in coordination with the Human Resources Department.

The Ethics Committee is composed of the Deputy CEO, the Human Resource Director and chaired by the Group Legal Director.

Responsibilities

NBK will:

- provide a working environment which reflects high ethical standards
- ensure that all employees understand the Code and have appropriate training
- monitor employees and others who work on our behalf to ensure they comply with the Code
- encourage employees to report violations without fear of punishment or retaliation
- provide confidential resources for employees to get advice or report Code violations
- prohibit retaliation towards any employee who, in good faith, reports a violation or helps an investigation
- deal effectively with any concerns about conduct, and
- work only with companies who share our commitment to ethical behavior.

As an NBK employee, you must:

- read, understand and regularly review this Code
- comply with its letter and spirit, and encourage others to do the same
- be alert to any Code violations and promptly report them
- not knowingly help another person to violate the Code
- participate in training to learn about business ethics, compliance, laws and regulations, and
- cooperate fully when asked to help us investigate alleged violations

Reporting Concerns / Whistleblowing

If you are concerned about a violation or came to know about one, talk to your line manager.

If you are not comfortable doing this, or if it is not practical or you want to talk to someone outside your line management, then you can report it to:

- the Human Resources Department,
- the Legal and Compliance Office, or
- the Ethics Committee

As long as you are acting in good faith, you will not be disciplined for asking questions or reporting concerns. We also absolutely prohibit anyone from retaliating against you for doing so. If any such retaliation occurs, you are requested to report it and we will take the appropriate disciplinary action against the retaliator in accordance with our disciplinary policy and the labor law.

Good faith means that you believe you are telling the truth. It does not mean you have to be right. The important thing is that you bring your question or concern to our attention.

If you are in any doubt about whether to speak up, ask yourself some simple questions:

- Is the issue I'm concerned about in line with our values?
- Does it comply with our policies and standards?
- Is it legal?
- Is it fair and honest?
- Will I sleep soundly tonight if I don't speak up?
- What would my family and friends think of the issue?
- Would I be comfortable if the issue was reported in tomorrow's newspaper?

If you are still not sure what to do, ask for advice.

PEOPLE

1. Fair Treatment and Equal Opportunity
2. Respectful Workplace
3. Drug and Alcohol Abuse
4. Human Rights

NBK has a diverse workforce spanning more than 30 nationalities. We all have different skills and capabilities and come from many background and cultures. This diversity has helped make the Company what it is today and is important for shaping our future.

1. Fair Treatment and Equal Opportunity

We want NBK to be a place of mutual trust and respect, which embraces diversity and values everyone for their merits.

Every decision we make about an employee must comply with our values, our policies and the law. This means that unless we are legally required or justified to do so, decisions about your employment will not be influenced by your:

- sex
- race
- colour
- national or ethnic origin
- sexual orientation
- religion
- political belief
- marital status
- caring responsibilities
- disability
- age, or
- citizenship.

We strive to maintain a work environment that is pleasant, healthy, comfortable and free from intimidation, hostility, discrimination, harassment or other behaviors that might interfere with productivity. Working together productively is vital to business success. Treating one another professionally and with respect is good business.

We will help you to develop your capabilities to meet our business needs, have open and constructive performance conversations with you and recognize and competitively reward your performance.

We believe in treating people with dignity and providing fair employment opportunities for our employees in our development practices, including recruitment, compensation, professional development and promotion.

We respect human rights, and recognize employees' rights. We also recognize that integrating the unique attributes and talents of our diverse work force contributes to better creativity and offers broader solutions to problems.

What is expected of you?

ALWAYS:

- ✓ Understand what behavior is appropriate, so you do not discriminate against other people
- ✓ Reflect our values in your actions
- ✓ Understand and comply with NBK policies, employment laws and regulations
- ✓ Respect local cultures and traditions
- ✓ Report any concerns you may have about discrimination or unfair treatment

NEVER:

- Tolerate, personally display or engage in unlawful discrimination or prejudice of any kind

2. Respectful Workplace

Every NBK employee has the right to respect and freedom from harassment. Violence at work is unacceptable, regardless of the reason.

NBK will not tolerate harassment or any violence against an employee, whether by a colleague, third party or a member of the public in the workplace.

If you harass a colleague, you will face disciplinary action.

Harassment means any behavior that offends someone, violates their dignity or intimidates or humiliates them.

Harassment can include:

- bullying
- using threatening, abusive or insulting words
- physical threats or assault
- unwanted physical contact, or
- open hostility in the workplace.

We take violence extremely seriously. Examples of violence include:

- verbal abuse
- offensive language
- racist or sexist remarks
- threatening behavior, or
- physical attacks, including spitting and throwing objects.

We will support you if you suffer mental or physical trauma.

Where appropriate, we will encourage police intervention, pursue criminal charges and support you in civil proceedings.

What is expected of you?

ALWAYS:

- ✓ Treat everyone you interact with at work with courtesy, dignity and respect
- ✓ Recognize cultural differences, find out about local practices and adapt your behavior accordingly
- ✓ Take reasonable care of yourself and other people who may be affected by your actions
- ✓ Follow rules and procedures designed for safe working
- ✓ Report all incidents of harassment, verbal abuse, threats and physical assault
- ✓ Assist in any investigation into an incident
- ✓ Report any dangers or concerns you may have about potentially violent situations or the environment in which you work

NEVER:

- Behave in a way that could be offensive, intimidating, malicious or insulting
- Humiliate, denigrate or injure another person
- Retaliate against someone who has made a complaint
- Threaten anyone with physical or verbal violence

3. Drug and Alcohol Abuse

NBK is committed to providing a safe and productive work environment, promoting employees' health and well-being, and protecting others from the consequences of alcohol, drug and substance misuse.

You must not use, possess, sell or distribute drugs or alcohol or other similar substances at work.

The use of drugs is a criminal offense; the use of alcohol is an offense to the local customs in Qatar. In either case, if you report to work under the effect of drugs or alcohol, your employment will be terminated immediately (ref. article 61 parag.6 of the Qatari Labor Law).

We have a responsibility to maintain discipline and a safe working environment, and to respond to poor performance, misconduct or excessive absence due to personal use of such substances.

What is expected of you?

ALWAYS:

- ✓ Be fit and ready to carry out your duties while at work
- ✓ Come to work free from alcohol which could affect your performance or which would breach the law or regulations
- ✓ Tell your manager if you are taking prescribed drugs which could affect your performance at work
- ✓ Report substance abuse by others

NEVER:

- Be in possession of illegal drugs, or prescription drugs other than those prescribed by a doctor
- Drink alcohol while on duty
- Report to work drunk

4. Human Rights

NBK recognizes the United Nations Declaration of Human Rights. Respect for human rights is a fundamental part of how we do business.

Human Rights are the basic rights and freedoms that belong to every person in the world. They are based on core principles like dignity, fairness, equality and respect. They are relevant to your day-to-day life and wherever we operate as a company.

Fundamental human rights include the right to life, the right to respect for private and family life and freedom of thought, religion and expression.

We respect human rights and do not take part in, or benefit from, any activity which abuses them.

The key principles of our approach are that:

- we are developing transparent processes to ensure we respect human rights
- we do not violate human rights
- our immediate supply chain and others over whom we have direct control or significant influence do not violate human rights, and
- any work we undertake must strengthen civil society and not support human-rights abuse.

What is expected of you?

ALWAYS:

- ✓ Observe, protect and promote human rights
- ✓ Assess new opportunities and market-entry strategies in accordance with the present human rights policy
- ✓ Comply with legal requirements regarding employment, wages and working hours
- ✓ Report any cases of human-rights abuse

NEVER:

- Work with suppliers or partners who hire child or forced labor
- Ignore, personally display or engage in human-rights abuse

BUSINESS

1. **Bribery, Corruption and Facilitation Payments**
2. **Gifts and Hospitality**
3. **Conflicts of Interest**
4. **Competition and Anti-Trust**
5. **Working with Suppliers**

We rely on our employees to work in NBK's best interests and to protect our reputation. This can be difficult. Many corrupt practices are against the law but others are not. This does not mean that we condone them. Personal and business integrity often comes down to common sense: if in doubt be cautious and ask your manager. To do otherwise could damage our business.

1. Bribery, Corruption and Facilitation Payments

Engaging in bribery, corruption and making facilitation payments can seriously damage our reputation and business relationships.

Bribery means giving or receiving an unearned reward to influence someone's behavior. A kickback is an unearned reward following favorable treatment. Both are corrupt practices along with abuse of power, extortion, fraud, deception, collusion, cartels, embezzlement and money laundering.

Under no circumstances will NBK approve any irregular payment or payment in kind (such as gifts or favors) to win business, encourage others to act improperly or influence a decision in our favor. If you give or take bribes or engage in any other corruption, you will face disciplinary action and, if appropriate, criminal proceedings.

Paying a small sum of money to an official to speed up their actions is known as a facilitation payment. We make no distinction between facilitation payments and bribes, no matter how small the amount. Facilitation payments are illegal.

Our position is clear: we will not make facilitation payments and we do not allow others who work for or represent us to make them.

However, we do recognize that on rare occasions an employee may be coerced into paying. If your safety or liberty is threatened, then you should pay. But you must record the payment and the circumstances and report them as soon as possible to your line manager and Legal Department.

We also recognize that there are legitimate fees for speeding up some services. An example might be a fee to quickly process a visa application. In such cases the fees should be fixed and published, the payment must be transparent and open, and you must obtain a receipt and record the transaction.

We promote our policy on bribery, corruption and facilitation payments among our business partners, including joint ventures, contractors and suppliers.

What is expected of you?

ALWAYS:

- ✓ Act with honesty and integrity and encourage others to do the same
- ✓ Understand the risks of bribery and corruption
- ✓ Report any concerns about bribery and corruption within NBK or in our dealings with others
- ✓ Report a facilitation payment
- ✓ Record and report any payments made due to extortion
- ✓ Be cautious when giving or receiving gifts or entertainment (see the section on Gifts and Hospitality)
- ✓ Make sure you are comfortable with the honesty and integrity of any agents representing NBK and ensure they understand our position on bribery, corruption and facilitation payments

NEVER:

- Offer, accept, solicit or pay a bribe or facilitation payment
- Use agents to offer or accept bribes or facilitation payments
- Do anything to encourage someone else to break these rules

2. Gifts and Hospitality

NBK develops long-term business relationships based on trust and respect. Exchanging gifts and hospitality can build goodwill, but may, or may appear to, create improper influence.

Gifts and hospitality mean anything of value that you give or receive, either directly or in kind. They include:

- goods or services
- hospitality and entertainment, such as meals, travel or tickets to events
- gratuities
- discounts
- personal favors
- loans, or
- anything else with a monetary value.

You must be careful when you give or accept business-related gifts or hospitality. You should know what is acceptable and consider the monetary value involved, as well as local customs and laws. If the gift or hospitality is of more than modest value, or you are unclear whether it is appropriate, ask your line manager.

Any gift or hospitality you accept must be of a type that you could also give as a proper business expense. Local rules may limit the value of gifts or hospitality you can accept. If you keep a gift, you should donate it to a nominated charity or make it available to everyone in your unit. If you return a gift, you should do so immediately, along with a written explanation.

You should take particular care if items of value are offered when we are negotiating or considering contracts and the recipient could influence the outcome, either directly or indirectly.

What is expected of you?

ALWAYS:

- ✓ Make sure any gifts or hospitality you offer comply with local laws and regulations
- ✓ Understand local customs for giving and receiving gifts and hospitality
- ✓ Use common sense when deciding what is reasonable
- ✓ Talk to your line manager if you have been offered a substantial gift or hospitality

NEVER:

- Solicit gifts or hospitality
- Offer or accept:
 - cash or its equivalent such as cheques, loans, gift certificates, stock or options
 - gifts or hospitality if you think that it may create an undue influence or business obligation
 - a discount that is not available to all employees
 - entertainment that is indecent or sexually orientated, that does not comply with our values or which might adversely affect our reputation
- Be embarrassed to decline a gift or hospitality

3. Conflicts of Interest

Conflicts of interest run counter to the fair treatment we expect. They can also break the law and seriously damage our integrity and reputation.

A conflict of interest occurs when your private interests interfere, or appear to interfere, with the best interests of NBK. A conflict of interest may also arise when your personal interests adversely impact your business judgment. Conflicts of interest can cause serious problems for you and damage our reputation. You should avoid actual conflicts of interest as well as the appearance of them. Make business decisions on behalf of NBK rather than your own personal interests or the interests of your family or friends.

You are free to make personal investments and enjoy both social and normal business relations as long as this does not conflict with any NBK business and with your functions within NBK. We also encourage you to participate in community, charitable and professional organizations. However, you must avoid all business and personal relationships that may create an actual or potential conflict of interest.

Outside affiliations such as directorships, a second job or providing services can create conflicts of interest and you must report them to your line manager. If the relationship is with a competitor, customer or supplier, you must obtain your line manager's written approval. Some arrangements are never permissible, such as when the relationship is with an organization you deal with as part of your job.

You must not have any significant financial interest in a supplier, including investments and debts, if you are involved in any aspect of our relationship with them, either directly or through someone who reports to you.

What is expected of you?

ALWAYS:

- ✓ Be professional and impartial in your relationships with contractors and suppliers
- ✓ Tell your line manager about any relationships which could create a conflict of interest
- ✓ Excuse yourself from making decisions that may create a conflict of interest for you

NEVER:

- Use your position, contacts or confidential information to benefit yourself or your family and friends
- Allow your relationship with contractors and suppliers to influence decisions you make on behalf of NBK
- Accept gifts or hospitality that might place you under an obligation

4. Competition and Anti-Trust

We are committed to free and open competition in our markets. We compete fairly and ethically, and support laws that promote and protect competition.

Anti-trust laws prohibit restrictions on competition, such as price-fixing. Some laws, including those of the US and European Union, can apply to activities outside their borders. Violations can be a criminal offence, with penalties including prison for individuals and heavy fines for companies.

We make decisions based on NBK's best interests. We do not discuss non-public information with competitors about anything that could limit competition, or agree with them to:

- fix prices
- control supplies
- allocate markets
- boycott customers or suppliers, or
- enter into any other anti-competitive agreements.

We do not use our influence to intimidate anyone or coerce them into anti-competitive conduct. We never suggest or imply that our suppliers or customers must buy products or services from us.

Anything we say to prospective customers, in bids or in contract negotiations, must be accurate and truthful. All the work we do for our customers must meet our contractual obligations.

What is expected of you?

ALWAYS:

- ✓ Make sure that decisions about pricing, customers, bids and markets are taken by us alone
- ✓ Make sure there is a legitimate reason for discussions with a competitor, supplier or contractor
- ✓ Seek Legal Department's advice if you are uncertain about how to proceed
- ✓ Use only publicly available sources to understand a competitor's business
- ✓ Leave any external event if someone starts to discuss competitively sensitive information
- ✓ Report any suspicion of anti-competitive behavior to Legal Department

NEVER:

- Discuss or agree any of the following with competitors:
 - fixing prices, discounts or pricing policy, for all or part of a contract
 - trading terms or conditions of contract
 - dividing up markets, customers or territories
 - partnering, with the explicit goal of eliminating all competition, or
 - rigging a competitive bidding process, including arrangements to submit a sham bid

5. Working with Suppliers

Our suppliers play a crucial role in our business and can also contribute to our sustainability and environmental goals.

We consider the social and environmental impact of the goods and services we buy, as well as the financial cost. Where practical, we take account of the costs and risks over the whole life of our purchases.

We select our suppliers on merit and expect them to meet our compliance and ethical standards. We apply consistent procurement processes and keep to our delegated approval authorities. We ensure that our supplier relationships are always based on fair and honest dealing.

We aim to minimize the risk of social exploitation within our supply chain. This makes business sense and helps to improve the living and working standards of people around the world.

NBK recognizes that small firms, voluntary and community organizations, social enterprises and ethnic-minority businesses are important members of our supply chain. They contribute to local economies and to social cohesion.

What is expected of you?

ALWAYS:

- ✓ Follow procurement processes and stay within your delegated authority
- ✓ Use preferred suppliers
- ✓ Ensure our supplier relationships are based on fair and honest dealings
- ✓ Communicate honestly and openly with suppliers
- ✓ Be clear on our terms of business and keep to them
- ✓ Ensure to enter into a proper agreement before committing to buying goods

NEVER:

- Breach your delegated authority
- Make a contractual commitment to a supplier until you have all the necessary approvals
- Tolerate ethical breaches by suppliers

ENVIRONMENT

1. **Health and Safety**
2. **Environment**
3. **Community Engagement**

We recognize NBK's impact on society, the economy and the planet, and aim to make a positive difference. This is embedded in the way we do business. We are committed to maintaining a safe, healthy and sustainable working environment, with a goal of zero harm. Everyone in NBK is responsible for making this a reality.

1. Health and Safety

Our goal is zero harm. Our work is never so urgent that we cannot take time to do it safely.

You have a legal duty to look after your own health and safety, as well as the health and safety of your colleagues and other people you interact with at work. This includes helping our customers, partners and contractors meet our health and safety standards.

Effective health and safety management needs a culture dedicated to eliminating accidents, near-misses and work related illness. This contributes to the well-being of everyone in NBK and requires a high level of health and safety awareness. It also helps us comply with our statutory obligations.

Our business units have the primary duty to identify and manage health and safety issues. This requires a formal and systematic approach, which ensures that we have identified, assessed and mitigated all risks.

In situations where we are contractually obliged to follow a customer's safety management system, we must still ensure that we comply with our statutory requirements.

What is expected of you?

ALWAYS:

- ✓ Understand the hazards associated with your work
- ✓ Follow the health and safety rules that apply where you work
- ✓ Stop any work that becomes unsafe
- ✓ Immediately report a health and safety incident or concern to your line manager
- ✓ Get help if you are uncertain of your health and safety obligations
- ✓ Come to work in a fit condition, free from the influence of alcohol or illegal drugs

NEVER:

- Undertake work for which you are not trained, competent or medically fit
- Assume that someone else will report a safety risk or concern

2. Environment

We work with our stakeholders to continuously assess and reduce our environmental impact.

We aim to prevent environmental damage, minimize our use of energy and resources and ensure that we follow the principles of sustainable development. We also encourage our customers, contractors and suppliers to do the same.

This means we need to understand our services' environmental impact, have systems in place to manage it and set ourselves targets for improvement. This involves reducing what we use, returning or re-using items, recycling and rethinking how we do things. These initiatives will both sustain the environment and improve our efficiency.

Our business units have primary responsibility for environmental management but we all have an individual responsibility for our impact. You should work in an environmentally responsible manner and strive to continuously improve your performance.

If special legal controls or legislation apply to an NBK operation which you manage, you must understand the requirements and make sure we comply.

What is expected of you?

ALWAYS:

- ✓ Understand your environmental impact
- ✓ Follow the environmental policies, procedures and guidelines that apply where you work
- ✓ Handle and dispose of hazardous materials properly
- ✓ Report any risk or incident which could harm the environment

NEVER:

- Waste resources
- Assume someone else will report an environmental risk or incident

3. Community Engagement

Being a good corporate citizen is central to the way we do business. Supporting the community brings real benefits to our customers, our shareholders and our people.

We seek to engage in open and transparent dialogue and consultation with communities and other representatives of civil society who have a legitimate interest in our operations.

We consider the social, environmental and other factors that are important to our customers and our surrounding communities. We aim to assess and report on NBK's contribution to local development.

Our community engagement initiatives can include local business development, providing opportunities for workers from disadvantaged backgrounds and partnerships which benefit our communities. We also share our expertise, skills and resources.

We encourage you to volunteer for social, environmental and economic initiatives in your community. Any decisions about NBK support for these activities are best made at a local level and will follow local procedures.

We are all responsible for ensuring that we respect the laws and customs of the countries we work in. We recognize the sensitivities surrounding the cultural heritage of indigenous communities and handle them in a spirit of trust, respect and dialogue.

What is expected of you?

ALWAYS:

- ✓ Comply with the laws and regulations where you work
- ✓ Respect the culture and customs where you work
- ✓ Consider the concerns of our national and local communities

ASSETS

1. **Financial Integrity**
2. **Confidential Information and Records**
3. **Keeping Information Secure**
4. **Business Communications and Technology**
5. **Electronic Publishing – Use of Social Media**
6. **External Communications and Public Disclosures**

NBK is committed to being a sustainable and reputable business. Our physical and intangible assets – including money, property, time and information – are key to achieving this. How we use and protect our assets has a strong bearing on how we perform and how well prepared we are for the challenges we will face.

1. Financial Integrity

Our books, records and financial reporting must accurately reflect the true state of our business.

Financial integrity is essential. Our management, shareholders, creditors, employees and customers rely on our financial controls, and our records and reports must meet our legal and regulatory requirements.

We all have a responsibility for ensuring our books and records are accurate, sufficiently detailed and timely. For example, you must show financial integrity when submitting or approving expense claims, or reporting hours worked.

Our internal controls must enable us to create financial reports that are correct and meet regulations. If you prepare or maintain accounting records of any kind, you must adhere to the group financial standards and processes.

Failing to keep complete and accurate records violates our policy and may also break the law. There is never a justification for falsifying records or misrepresenting facts. This could be fraud and can result in civil and criminal liability for you and NBK.

What is expected of you?

ALWAYS:

- ✓ Follow all laws, external accounting requirements and our procedures for financial reporting
- ✓ Gain approval for every transaction from someone with the right authority
- ✓ Keep detailed and accurate records of transactions
- ✓ Co-operate with our internal and external auditors
- ✓ Promptly report any irregularities in our internal controls, accounting or auditing

NEVER:

- Carry out an unapproved transaction
- Sell, transfer or dispose of our assets without proper authorization and documents
- Commit NBK to contracts which are beyond your delegated authority

2. Confidential Information and Records

Information is confidential if it has value to NBK and is not publicly available. You might also obtain confidential information from our customers, partners and others.

We all deal with company records and information on a daily basis. We need to manage them properly to protect our intellectual property.

Your use of confidential information must comply with our policy and the law. You should take particular care to comply when:

- you transfer information inside or outside NBK, or
- you are in a public place and other people could overhear your conversation or see your documents.

You must not alter, destroy or hide NBK's records and documents, unless you have authorization. You must take particular care with documents relating to litigation or government/regulatory investigations.

If you leave NBK to work elsewhere, you must not reveal confidential information about NBK not NBK's customers and suppliers. Similarly, if you previously worked for a customer or competitor, you should keep the information you obtained there confidential. It is never acceptable to coerce someone into divulging confidential information about a previous employer.

If you report your hours worked, you must do so truthfully and accurately. Failure to comply with timesheet policies and procedures is grounds for disciplinary action.

Our policies and the law require us to keep certain types of information for specified periods. You must make sure you know and follow these requirements.

What is expected of you?

ALWAYS:

- ✓ Follow all information security, data protection and retention rules that apply where you work
- ✓ Protect information and records from unauthorized access or interference
- ✓ Use confidential information and personal data only for the purpose for which it was intended
- ✓ Understand the legal restrictions on moving information, particularly outside its country of origin
- ✓ Retain information in line with retention requirements

NEVER:

- Leave sensitive information lying around or unsecured
- Discuss confidential information in public
- Disclose confidential NBK information to a new employer
- Disclose confidential information about your former employers
- Conceal, alter, destroy or tamper with NBK's records

3. Keeping Information Secure

We need to carefully manage the way we use IT equipment, passwords and logins. We must also accurately classify our information and dispose of it properly.

We must protect valuable information from unauthorized disclosure, modification or deletion. We also respect people's right to keep their personal data private.

You must not connect non-NBK or private IT equipment to NBK or customer networks without your IT department's permission. You must not intentionally introduce viruses, Trojans or other malicious programs into systems belonging to us, our customers or our partners.

You must keep your NBK login details safe. Your password should not be easily guessed by others (such as your birthday or your children's names). If you believe your password has been used without your knowledge, you must change it and report it to your line manager or IT Department.

You must not disclose information to any person who does not have the right or need to know. You should only copy it onto removable media when there is a significant or unavoidable business need and the removable media is encrypted. If you are electronically transmitting the information outside NBK, then you should encrypt it.

You can share information with third parties only if they have completed a Non Disclosure Agreement.

You should not provide information about NBK employees, our customers or partners to any third parties, unless you have authorization from the information owner.

You must permanently remove business-sensitive and personal information from devices prior to their disposal or reuse.

What is expected of you?

ALWAYS:

- ✓ Keep your passwords and other login details safe
- ✓ Change your password at least every 90 days or immediately if someone else knows it
- ✓ Maintain appropriate privacy levels for information
- ✓ Lock your PC when you leave it unattended
- ✓ Consider the security of documents, PCs and IT equipment when travelling
- ✓ Report the loss of any laptop, mobile phone, personal digital assistants (PDAs), removable media device or any paperwork that contains confidential, customer or personal data

NEVER:

- Use a password that does not meet our guidelines
- Write down or disclose your username, password or any other access code or use someone else's
- Attempt to crack or capture passwords or decode encrypted information
- Remove or disable our anti-virus software and malware controls
- Leave PCs or other IT equipment in an unattended vehicle for a long period
- Create computer viruses, or
- Monitor or intercept network traffic

4. Business Communications and Technology

Effectively managing our information, systems and communications is critical. We want our employees to access, process and publish information in ways that meet our social, ethical, legal and security requirements, while protecting our reputation.

We provide you with computer technology to make our processes and communication more efficient and effective, without replacing personal contact. The following are company property and you should only use them for their intended purposes:

- our computer hardware and software, and
- the information on our systems.

You can use NBK's information systems for appropriate personal use, although we may limit this, and provided it is of a reasonable duration and frequency, and does not:

- detract from your performance or that of your colleagues
- harm our reputation, or
- interfere with our business.

You may use NBK-provided telephones, including mobile phones and PDAs, to make a reasonable level of personal calls. You are responsible for all text, audio and images you send using NBK's email and other messaging systems, including instant messaging and text messaging.

You must only use NBK email addresses and messaging systems for NBK business.

You must be vigilant for suspicious emails and messages.

What is expected of you?

ALWAYS:

- ✓ Use computer hardware, software and the information on our systems responsibly and for business purposes
- ✓ Ensure your personal internet use does not affect your work

NEVER:

- Make calls or send texts which are abusive
- Call premium rate numbers, except for business reasons
- Make private international calls, unless you are abroad on company business
- Conduct any unapproved private employment or business activities
- Distribute, print or access any pornographic, obscene, indecent, hateful or other offensive material (for example material that is racist)
- Engage in any illegal activity, including fraud, plagiarism, forgery, or any form of intimidation or harassment
- Download, store, copy or transmit the works of others (including software, games, MP3 music and video files) without their permission, as this may infringe copyright
- Participate in online gambling, or soliciting for personal gain
- Disable NBK's security measures

5. Electronic Publishing – Use of Social Media

Social media provide new opportunities for business, communication and collaboration, and new obligations for us to protect our people and reputation.

Social media includes sites such as MySpace, Facebook, YouTube, LinkedIn, Twitter, blogs, wikis, newsgroups and others where you can post text. We recognise that you may use social media for self-expression and that in some circumstances NBK's interests can be supported through these channels.

You are responsible for everything you publish on social media. If you identify yourself as an NBK employee, then:

- your profile and content must be consistent with the way you would present yourself and NBK to colleagues and customers
- you must not post indecent, offensive, discriminatory or defamatory content
- your content must respect all religious, political, economic and racial differences and opinions
- your content must respect others' privacy, and
- anything you state as fact must be correct and fair, and where you make mistakes, you must correct them as soon as possible.

If you publish anything about NBK, you must make clear that the views are yours and do not represent NBK's.

Where appropriate for your work, you may publish material on social media sites which refers to NBK or uses our name, providing you:

- behave professionally
- do not harm the reputation of NBK and our employees
- check the privacy settings, to ensure that your posts do not compromise your identity, location or other personal details in a way that could put you, your colleagues, the company or our customers at risk.

If you find online material about NBK which is wrong, unfair or defamatory, you should tell your line manager.

What is expected of you?

ALWAYS:

- ✓ Ensure you publish material which is correct and fair
- ✓ Make it clear that you have published information in a personal capacity and that it does not represent NBK's view
- ✓ Remove information you have published which breaches legislation, regulations or NBK policy

NEVER:

- Publish information that could compromise your security or that of NBK, colleagues or customers

6. External Communications and Public Disclosures

Our reputation is affected by what people hear about us, either directly or through the media. We must therefore make sure our external communications are coordinated and consistent.

You can only communicate on behalf of NBK if you have permission to do so. If you are communicating on our behalf, the information you give must be accurate, consistent and timely. Do not make misleading claims about the company, our services or our competitors.

Much of our business is carried out in the public eye. You must treat members of the public with respect, courtesy and consideration. In other words, treat others as you would like them to treat you.

External presentations and speeches are good opportunities to raise awareness of NBK and enhance our reputation. However, you must consider the benefit to NBK and get approval from your line manager before accepting an external speaking engagement.

What is expected of you?

ALWAYS:

- ✓ Ensure information is accurate and complete, and get approval before disclosing it
- ✓ Promptly forward requests from the media or other organisations to your line manager
- ✓ Report any unintended disclosure of information, such as loss or theft
- ✓ Keep a record of all actions, decisions and communications during a critical event

NEVER:

- Make false or misleading claims
- Provide information to investors, analysts and associated media unless approved by the management

Dealing with Ethical Issues

Be alert to Ethical Issues

We must always be alert to ethical issues.

Understanding the ethical and reputational issues involved is an important part of our approach in doing business.

If you feel any ethical concern, you should ask for guidance. In particular, you should consider ethical issues in relation to:

- a new country or service line, or
- any situation in which we, or someone in our supply chain may:
 - infringe human rights
 - compromise our legal and regulatory compliance, business integrity or cultural sensitivity
 - put our staff in harm's way, or
 - breach our values and cultures.

If you face any of the issues above, you must refer it to your line manager. If the issue is significant, it will be referred to the **Ethics Committee**.

Stop and Think

There are a number of simple warning signs flagged by everyday phrases that should make you stop and think.

These phrases include:

- Yes, but just this once...
- Nobody will find out that...
- Who cares how, as long as it works...
- Everybody else does it...
- We've always done it that way...
- We don't have to mention that...
- Now remember, I never told you this...
- Just close your eyes to...
- It isn't that serious...
- It's easier to get forgiveness than permission...
- If we had to follow all the rules, we couldn't get any work done...

If you find yourself using any of these expressions ask yourself:

- Is it in line with NBK's values?
- Does it comply with our policies and standards?
- Is it legal?
- Is it fair and honest?
- Will I be proud of what I've done?
- Will I sleep soundly tonight if I do this?
- What will my family and friends think of what I'm doing?
- Would I be comfortable with my actions being reported in tomorrow's newspaper?

If you are still not sure what to do, ask for advice. You must always be certain you are doing the right thing.

Speak Up

There may be situations when you want to report a concern.

As a first step, talk to your line manager. If you are uncomfortable with this, or it is impractical or you want to talk to someone outside your line management, then you can report it to:

- the Human Resources Department,
- the Legal and Compliance Office, or
- the Ethics Committee