

Anti-Bribery and Corruption Policy



December 2024

Document Version History:

Version	Revision / Adoption Date	Change Description
1	December 2024	Initial Release

Table of contents

1.	Introduction	3
2.	Purpose	3
3.	Scope	3
4.	Definitions	3
5.	Policy statements	4
6.	Reporting procedures	4
7.	Corrective actions	5
8.	Effective Date	5

1. Introduction

Mannai Corporation QPSC (hereinafter referred as the “Company”) is committed to conduct business in compliance with the principles established in its Code of Business Conduct & Ethics, its values, and the applicable laws and regulations.

The Company has zero tolerance for any form of bribery and corruption and is committed to ensure that corruption does not occur in the Company.

2. Purpose

The purpose of Anti-Bribery and Corruption Policy (“the Policy”) is to establish the Company’s commitment to preventing, detecting, and addressing the incidents related to bribery and corruption. This Policy sets out our standards for ethical conduct and compliance with all applicable laws and regulation.

3. Scope

This Policy applies to all employees and anyone representing or acting on behalf of the Company, including stakeholders such as customers, partners, vendors, contractors, and consultants.

The Company requires that all employees and representatives adhere to this Policy, upholding similar standards of integrity and ethical business conduct.

This Policy should be read in conjunction with other policies of the Company such as:

- Code of Business Conduct and Ethics
- Whistleblowing Policy and Procedures

4. Definitions

Bribery is defined as the undisclosed offering, giving, receiving, or soliciting of anything of value to wrongly influence the actions of an individual in a position of power.

Corruption is defined as dishonest, fraudulent or criminal act of an individual or organization using entrusted authority or power to make an improper personal, unethical or illegal gain.

Examples of actions constituting bribery and corruption include, but are not limited to:

- Improper Influence: Offering or accepting gifts, payments, or favors that could unfairly affect business decisions.
- Kickbacks and Unlawful Payments: Giving or receiving payments or kickbacks to secure business, manipulate contracts, or gain an unfair advantage during bids or negotiations.
- Bribery of Officials: Influencing government or public officials through payments, favors, or benefits to gain preferential treatment or business advantages.
- Unauthorized Gifts and Hospitality: Providing or accepting valuable gifts or hospitality from business partners without disclosure, creating undue influence or conflicts of interest.
- Forgery and False Representation: Falsifying documents, financial records, or communications to deceive others or gain illegal benefits.

- Assisting Corrupt Practices: Helping or enabling others to engage in bribery or corruption.
- Other Related Misconduct: Any behavior that supports or resembles bribery, corruption, or abuse of power for personal or business gain.

5. Policy statements

- The policy of the Company is that its business shall be conducted in compliance with the laws, rules and regulations of the state of Qatar relating to anti-bribery and corruption. The Company or its employee(s) or officers shall not, directly or indirectly, in the name of, on behalf of, or for the benefit of the Company, offer, pay, or authorize the payment of any money of offer, give, promise to give or authorize the giving of anything to:
 - a) Any official, agent or employee or any government or governmental agency, or official, employee or agent thereof, for the purpose of influencing any act or decision of such person in their own or their official capacity, or for the purpose of including such persons to use their official capacity to influence any act or decision of their government or any instrumentality thereof;
 - b) Any private person, in order to obtain or retain business, or provide a business advantage related to any business opportunity in any way violate any provision of the said laws either locally or globally.
- The Company enforces a zero-tolerance policy regarding bribery and corruption and prohibits all employees and relevant stakeholders from engaging in or supporting any form of bribery, corruption, or improper influence.
- The primary responsibility for preventing and detecting bribery and corruption lies with all levels of management and functions involved in establishing and maintaining strong internal controls and compliance measures.
- All levels of management must ensure that effective procedures and controls are in place to mitigate and identify risks related to bribery and corruption within their areas of oversight.
- Management at all levels is responsible for fostering an environment of ethical conduct and transparency, actively identifying and addressing risks of bribery and corruption, and ensuring that robust controls are in place to mitigate these risks.
- All employees and relevant stakeholders must understand their responsibilities under this Policy and are obligated to immediately report any actual or suspected instances of bribery, corruption, or related misconduct.

6. Reporting procedures

- All employees and stakeholders are required to immediately report the incident related to the bribery and corruption on compliance@mannai.com.qa.
- Email sent to compliance@mannai.com.qa will be delivered to the official email boxes of:
 - a) General Manager and Manager – Risk, Compliance and Internal Audit
 - b) Senior Legal Advisor
- The Company will identify and promptly investigate the reported incident for bribery and corruption or related dishonest activity. Such investigation will be conducted as per the procedures outlined in the approved “Whistleblowing Policy & Procedures” of the Company.
- The Company shall obtain written statements during the investigation process from all relevant persons who are being interrogated with the incident of bribery and corruption and such relevant

persons shall be allowed to review their statements recorded upon completion and shall sign the statement acknowledging their statement.

The Investigation officer/team shall submit their written report to the Management which shall be signed by the Investigation officer/team upon completion of the investigation process.

7. Corrective actions

Employees who do not comply with the requirements of this Policy will subject to the disciplinary action, up to and including termination of employment and legal proceedings.

For all other relevant stakeholders (e.g. customers, partners, vendors, contractors, and consultants), non-compliance of this Policy shall have serious consequences and may result in possible damage claims and legal proceedings.

8. Effective Date

This Policy will come into effect from the date of its publication on the Company’s Website.

Approvals

Santhosh Krishnamoorthy CFO	
Alekh Grewal Group CEO	
H.E. Sheikh Khalifa Bin Abdullah Al Thani Chairman – Audit Committee	
H.E. Sheikh Suhaim Bin Abdullah Al Thani Vice Chairman – Board of Director	
On behalf of the Board of Directors	