

QNB FAKTORING SUSTAINABILITY POLICY (POL.019)

1. Entrance

Sustainability at QNB Faktoring is defined as providing long-term value in financial, environmental, social and ethical terms for the benefit of customers, shareholders, employees and society, in line with the sustainability strategy of QNB Group (Group).

QNB Faktoring's Sustainability Policy (Policy), which has been prepared in accordance with the QNB Group Sustainability Policy (framework sustainability policy), will cover QNB Faktoring's (Company) sustainability approach and ESG (Environmental, Social, Governance) commitments, the direct and indirect impacts of the Company's activities and explains the organization in a way that ensures that a consistent approach is provided throughout.

QNB Faktoring also supports the following international conventions, principles and guidelines on which the policy is based through this Policy:

1. International Labor Organization "Declaration on Fundamental Principles and Rights at Work"
2. United Nations "Global Compact"
3. United Nations "Guiding Principles on Business and Human Rights"
4. World Bank "Environmental, Health and Safety Guidelines"

2. Purpose

This Policy provides an overview of the Company's ESG commitments, rather than a detailed set of rules for implementation. As required, this policy is supplemented by topic specific policies, position statements and guidelines to support effective implementation across all relevant divisions (business, support and control).

At a minimum, this policy requires compliance with all relevant legislative and regulatory ESG requirements and that we adhere to internationally recognized sustainability principles for environmental protection, human and labor rights, and anti-corruption.

3. Scope

This Policy is prepared in alignment with the QNB Group Sustainability Policy (the framework policy established by Qatar National Bank S.A.Q (QNB Group)) and covers all branches of the Company.

All relevant divisions (business, support and control) are responsible for aligning within the requirements of this policy, ensuring compliance with all applicable laws, regulations and standards.

4. Reference

- QNB Group Sustainability Policy
- QNB Faktoring Employee Code of Conduct Instruction (TAL.003)
- Anti-Money Laundering and Combating Financing of Terrorism Policy (POL.012)
- QNB Faktoring Anti-Bribery and Anti-Corruption Policy (POL.011)
- Conflict of Interest Policy (POL.002)
- Protection and Process of The Personal Data Policy (POL.013)
- Whistleblowing Policy (POL.020)

5. Audience

This policy is relevant to all employees of the Company. It is the responsibility of the Company's Senior Management to ensure that the policy is implemented and complied with where relevant to their respective areas of responsibility.

6. Sustainability Strategy and Sustainability Commitments

QNB Faktoring's sustainability framework consist of three pillars: Sustainable Finance, Sustainable Operations and Corporate Social Responsibility. All three pillars support the Company's purpose of ensuring sustainable financial performance through mitigating risks, creating new business opportunities, and strengthening its brand. Under all three pillars, in line with the Group, a number of commitments have been set out to establish common global standards and issues that are most important to the Company in terms of sustainability.

6.1. Sustainable Finance

"Sustainable Finance" means the integration of ESG criteria into QNB Faktoring's financing activities in order to create value. The main objective of the company in this context is to support its customers in managing their environmental and social risks, to provide financing to businesses that contribute to sustainable development, to facilitate access to finance for SMEs and individuals and institutions with limited access to financial services, and to provide responsible services to customers.

"Sustainable Finance" is the most important way for QNB Faktoring to support national and global sustainable development initiatives, as well as reducing reputational risk and maximizing business opportunities arising from the transition to a greener, more inclusive economy.

QNB Faktoring's commitments under the heading of "Sustainable Finance" are as follows.

6.1.1. Environmental and Social Risk Management Lending

As part of its strategic commitment to sustainable finance, QNB Faktoring subjects financing transactions to internationally accepted risk categorization and integrates principles on environmental and social risk management into the due diligence process of these transactions.

6.1.2. Sustainable Lending Portfolio

QNB Faktoring standardizes the methodology and criteria it applies to its "green/social credit" portfolio in order to monitor its contribution to sustainable development goals in accordance with internationally accepted principles.

6.1.3. Sustainable Products and Services

QNB Faktoring offers its customers products and services that draw attention to social or environmental issues, such as promoting financial inclusion or mitigating the effects of climate change, and captures ever-changing technological trends to improve its products and services with an innovative and customer-oriented perspective.

6.1.4. Sustainable Investment

QNB Faktoring builds in-house capacity to assess ESG risks and opportunities associated with its own investments as well as those of its clients.

6.1.5. SME's and Entrepreneurship

While supporting the growth of SME's and entrepreneurs by providing financing sources, QNB Faktoring takes various steps to increase the participation of those who do not have access to financial services or who are underserved in financial services.

6.1.6. Responsible Customer Communication and Marketing Activities

QNB Faktoring provides transparent and responsible financial services and customer communication to its customers to enable them to make better financial decisions.

6.1.7. Privacy of Customer Information and Data Security

QNB Faktoring ensures the protection of customer information and respects the privacy of private life within the framework of the issues specified in the applicable privacy and data protection regulations.

6.2. Sustainable Operations

"Sustainable Operations" means the integration of ESG criteria with commercial activities and supply chain in order to ensure that QNB Faktoring can work ethically and efficiently. The main objective of the company in this context is to further strengthen its corporate governance and risk management practices, to support equality within the workforce and to reduce carbon emissions arising from its activities. This approach helps the Company become the "employer of choice" while also meeting the growing ESG-related demands.

QNB Faktoring's commitments under the heading of "Sustainable Operations" are as follows.

6.2.1. Corporate Governance, Compliance and Risk Management

QNB Faktoring's corporate governance infrastructure is essential to ensure business success. In this context, the company takes care to provide the highest standards in terms of honesty, integrity and responsibility. The company has a world-class corporate governance framework that ensures that it is fully compliant at all levels and can effectively manage all risks. Its prudent approach to risk management is an important component of QNB Faktoring's activities. This approach protects the Company's customers, profitability and reputation. The centralized risk management approach is complemented by a culture of expertise and risk in which each Company employee is responsible for potential risks in the course of their work.

In order to adapt to the ever-changing regulatory environment, QNB Faktoring takes strong corporate governance measures that combine all aspects of internal control, risk management and legal compliance throughout the organization.

6.2.2. Anti-Bribery and Corruption

QNB Faktoring adopts a zero-tolerance approach to bribery and corruption and acts with the highest level of professionalism and integrity in all its business transactions and relationships. The Company implements effective processes, takes measures and establishes systems against all forms of corruption, laundering proceeds of crime and financing of criminal activities. QNB Faktoring encourages the use of confidential whistleblowing mechanisms to protect the Company's image and reputation.

Employees of the Company are prohibited from directly or indirectly soliciting or receiving gifts from customers, suppliers or third parties with whom they have relations on behalf of the Company. These rules also apply to gifts to be given by the specified parties to the family and relatives of the employee. As a general rule, a gift should be modest and should not make the recipient feel obligated to do anything in return.

6.2.3. Notification of Irregularities within the Company and Employee Hotline

In order to fulfill this responsibility, the Board of Directors has decided to ensure that all QNB Faktoring employees are entitled to the following issues in writing, by mail or electronically, by message:

- Contrary to all relevant laws and regulations in force,
- Contrary to the current accounting records, practices, regulations, procedures and principles,
- Undermines the internal control environment, contradicts the Company's procedures and instructions

It establishes the necessary procedures and systems for reporting transactions and actions, irregularities and abuses.

QNB Faktoring employees should refer to the Notice Policy (POL.020) for details on this issue.

6.2.4. Human Rights and Labor Standards

QNB Faktoring respects the human rights of everyone affected by its activities and ensures that everyone is treated with dignity and equality, regardless of race, religion, gender, age or language. The company offers a working environment where its employees are treated with fairness, equality and respect. Providing equal remuneration and development opportunities, establishing complaint mechanisms, preventing discrimination, ensuring occupational safety and safety of employees are

evaluated within this framework. QNB Faktoring expects its customers and suppliers to respect human rights and prevents child labor and forced labor within its own workforce and supply chain.

6.2.5. Talent Management and Development

QNB Faktoring offers continuous training and career development opportunities to its employees in order to attract, recruit and retain the best talents in the Company. The company helps to identify the strengths and development needs of each employee, in line with their desired job skills, and creates development plans specific to each employee to support them in achieving their career goals.

6.2.6. Environmental Impacts of Operations

QNB Faktoring acts in accordance with all relevant environmental laws and regulations; It manages its direct environmental impacts by monitoring and continuously improving its internal environmental management system. The company sets targets to reduce carbon emissions from its operations and increase resource efficiency (such as energy, water, paper, waste).

6.2.7. Responsible Procurement and Supply Chain

Within the scope of the management of third-party risks, QNB Faktoring evaluates the sustainability risks within the supply chain and cooperates with third parties to ensure compliance. The Company expects third parties to act in accordance with applicable laws and regulations as a minimum requirement.

6.2.8. Compliance and Transparency

The company applies the tax laws taking their letter and purpose into account. The "Compliance Officer" works to ensure that the Company's products and services are not associated with any agreement/scheme that is known or creates suspicion that it was created for the purpose of committing a financial crime, including tax evasion.

6.3. Corporate Social Responsibility

"Corporate Social Responsibility" refers to the Corporate Social Responsibility (CSR) activities in the areas in which QNB Faktoring operates. The company's goal is to reach wider audiences and make a positive contribution to society through CSR activities.

QNB Faktoring's commitments under the heading of "Corporate Social Responsibility" are as follows.

6.3.1. Social and Community Investments

QNB Faktoring is committed to implement activities and initiatives aimed at socio-economic development in various fields such as children, youth, education, arts and culture, and sports.

Our Awareness Projects

- Donation of saplings for birthdays from TEMA
- Climate awareness trainings for children with TEGV
- Supporting KAÇUV (Hope Foundation for Children with Cancer)
- Adoption of the QNB Gender Equality Guidelines
- Any printed agendas and calendars for company employees and customers

6.3.2. Youth, Children and Education

QNB Faktoring supports and implements many CSR projects as part of its deep-rooted perspective focusing on youth, children and education and QNB projects. The company aims to develop the analytical thinking ability and academic knowledge and art skills of the young generation through various trainings and programs focusing on these areas.

6.3.3. Volunteering

QNB Faktoring supports and encourages its employees to volunteer in the activities coordinated by the Human Resources team within the scope of QNB projects.

7. Implementation

This Policy should be read and evaluated in conjunction with other relevant QNB Faktoring policies, procedures and instructions established to implement sustainable business practices throughout the Company.

8. Reporting, Disclosures and Transparency

In order to support transparency in the Faktoring sector, QNB Faktoring discloses its sustainability performance to the public in accordance with the relevant local and global reporting standards with its annual report and/or independent sustainability report. The company ensures the establishment of standards that will demonstrate the highest data quality in reporting and uses this issue as a driving force for continuous improvement.

9. Dialogue with Stakeholders

QNB Faktoring establishes communication and consultation channels to receive feedback from its main stakeholders such as employees, shareholders, customers, suppliers and regulatory-supervisory institutions and to understand the priorities of its stakeholders.

10. Governance

QNB Faktoring Sustainability Committee: The owner of this Policy is the QNB Faktoring Sustainability Committee, as the main executive and decision-making authority on sustainability. As the owner of the Policy, the Sustainability Committee is also responsible for reviewing sustainability strategy and commitments, identifying priority issues for implementation with relevant working groups, monitoring performance, and assessing ESG-related risks and opportunities. Where necessary, the Sustainability Committee notifies the Board of Directors about key risks and opportunities.

Sustainability Team: The Sustainability Team is responsible for the management of all of the Company's sustainability activities (such as sustainability reporting, policy and procedure creation, managing stakeholder expectations, providing guidance and opinions on sustainability-related issues/questions, etc.). The team also advises the Sustainability Committee and senior management on sustainability-related issues. The team is the owner of processes such as finance, operations, credit, legal compliance and human resources that may be related to the components of the sustainability issue.

Board of Directors: The Board of Directors supports the Sustainability Committee for the successful implementation of the items on the Company's sustainability agenda. At a minimum, the Board of Directors is informed annually about the Company's overall sustainability activities and performance through the QNB Faktoring Sustainability Committee.

Internal Systems (Internal Control, Compliance, Risk Management / Internal Audit): Internal systems and units that partially or fully fulfill their responsibilities within the scope of internal systems provide guidance and support to the Sustainability Committee and the Sustainability Team to ensure the correct adoption and implementation of the issues specified in this Policy within their areas of responsibility.

11. Effective

This Policy is subject to the approval of the Board of Directors. The Sustainability Committee is responsible to the Board of Directors for the annual review of this Policy.