



INTRODUCTION

QAFAC regulatory compliance and administrative duties are a critical part of our ability to operate legitimately and successfully. We conduct our business in compliance with the principles established in our Code of Conduct, our values, and applicable laws and regulations. This Policy defines QAFAC's position and minimum compliance requirements for our employees.

OUR COMMITMENTS

- We comply with all laws and regulations applicable to our operations and conduct those operations to the highest ethical business standards.
- We are committed to obtain and maintain all applicable licenses, permits and government authorizations when required under the applicable law.
- We always commit to maintain accurate accounts and records including:
 - the recording of transactions in a timely and complete manner
 - in enough detail such that the purpose and amount of the transaction is clear
 - with no false or misleading entries
 - in compliance with international financial reporting standards and generally accepted accounting practices.
- We comply with all laws and regulations relating to insider-trading.

EXPECTATIONS AND APPLICABILITY

We require employees and all persons doing business with QAFAC to comply with this policy. Failure to do so may have serious consequences and may result in criminal and civil proceedings, possible damage claims, significant fines and/or possible imprisonment. QAFAC's reputation may also be damaged through adverse publicity or negative impact to our organizational goodwill.

- Employees and all persons doing business with QAFAC should never use off-the-books or secret accounts with the intention of overriding or circumventing internal controls.
- Employees must never issue any documents which do not properly and fairly record the transactions to which they relate.
- QAFAC records must never be altered, falsified, hidden or disguised in order to alter the nature of the transaction.
- Employees and all persons doing business with QAFAC have a responsibility to retain all business records in accordance with this policy and applicable legal and regulatory requirements.
- Employees and all persons doing business with QAFAC should not use (or provide to others) confidential and/or non-public insider information with the aim of buying or selling stocks or other securities.
 - This includes information belonging to those doing business with QAFAC, its partners, customers, suppliers and contractors, and any other third parties, where information provided to QAFAC in relation to a contractual arrangements, mergers, acquisition or divestment transaction-related activity, or in connection with other QAFAC's activities.
- Certain categories of employees cannot trade in shares or other securities in the companies with which QAFAC does business or holds participating interest due to the nature of their roles at QAFAC. These employees are included on IQ Insider Trading List which outlines the scope of their applicable prohibitions in alignment with the role they fill within the QAFAC organization.

Where this Policy sets higher standards than those required locally, the higher requirements of this Policy will apply. It is everyone's duty to speak up if they observe or suspect a violation of this Policy. We will only work with those who share our standards of business conduct and values.


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