ENPARA BANK SUSTAINABILITY POLICY

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1. Introduction

At Enpara Bank, sustainability is defined in line with the QNB Group's sustainability strategy as creating long-term value for customers, shareholders, employees, and society from financial, environmental, social, and ethical perspectives.

Prepared in alignment with the QNB Group Sustainability Policy (the framework sustainability policy), the Enpara Bank Sustainability Policy (the "Policy") sets out Enpara Bank's (the "Bank") sustainability approach and ESG (Environmental, Social, and Governance) commitments. The Policy covers both the direct and indirect impacts of the Bank's activities and aims to ensure a consistent and integrated approach across the entire organization.

2. Purpose

The Enpara Bank Sustainability Policy provides a high-level overview of the Bank's sustainability approach rather than detailed implementation rules in alignment with the United Nations Sustainable Development Goals (SDGs).

Where necessary, this Policy is supported by other topic-specific policies, position statements, and guiding principles to ensure effective implementation across all relevant Bank functions (business, support, and control).

At a minimum, this Policy requires compliance with all applicable ESG-related regulations and adherence to internationally recognized sustainability principles concerning environmental protection, human rights, labor (worker) rights, and the fight against corruption.

3. Scope

This Policy has been prepared in alignment with the QNB Group Sustainability Policy, the framework policy established by Qatar National Bank S.A.Q. (QNB Group).

All relevant Bank functions (business, support, and control) are responsible for ensuring compliance with the requirements set out in this Policy, as well as with all applicable laws, regulations, and standards in force.

4. References

- QNB Group Sustainability Policy
- QNB Group Human Rights Statement
- Enpara Bank Sustainability Committee Charter (YÖN.00059)
- Enpara Bank Reputation Risk Management Policy (POL.00084)
- Enpara Bank Anti-Money Laundering and Counter-Terrorist Financing Policy (POL.00025)
- Enpara Bank Anti-Bribery and Anti-Corruption Policy (POL.00022)
- Enpara Bank Conflict of Interest Policy (POL.00001)
- Enpara Bank Personal Data Protection and Processing Policy (POL.00021)

- Enpara Bank Internal Misconduct Reporting and Employee Whistleblowing Hotline Procedure (TAL.00967)
- Revenue Management Procedure (TAL.00745)

5. Target Audience

This Policy applies to all of the Bank's operations and all employees associated with those operations. The Bank's Senior Management is responsible for the implementation of this Policy and for ensuring compliance within their respective areas of responsibility.

6. Sustainability Strategy and Sustainability Commitments

QNB Group structures its sustainability approach under three main pillars: Sustainable Finance, Sustainable Operations, and Beyond Banking. In alignment with the QNB Group framework, Enpara has designed its sustainability approach and focus areas accordingly, structuring them around four strategic pillars: Climate-Friendly Operations, Corporate Social Responsibility, Digital Inclusion, and Data Security and Ethics. These four pillars are positioned to align with and complement the Group-level framework, while also reflecting Enpara's specific operational priorities and business model.

The schematic visual below illustrates the alignment between the QNB Group Sustainability Framework and Enpara's four focus areas. Accordingly, Digital Inclusion and Data Security and Ethics are grouped under Sustainable Finance, while Climate-Friendly Operations is associated with Sustainable Operations within the Group framework. Corporate Social Responsibility initiatives fall under the Beyond Banking pillar of the QNB Group Sustainability Framework.

All four pillars support the Bank's objective of achieving Sustainable Financial Performance by mitigating risks, creating new business opportunities, and strengthening the Bank's brand.

Under each pillar, and in alignment with the QNB Group, specific sustainability commitments have been defined, focusing on the topics that are most material to the Bank and aiming to contribute to the development of shared global standards.

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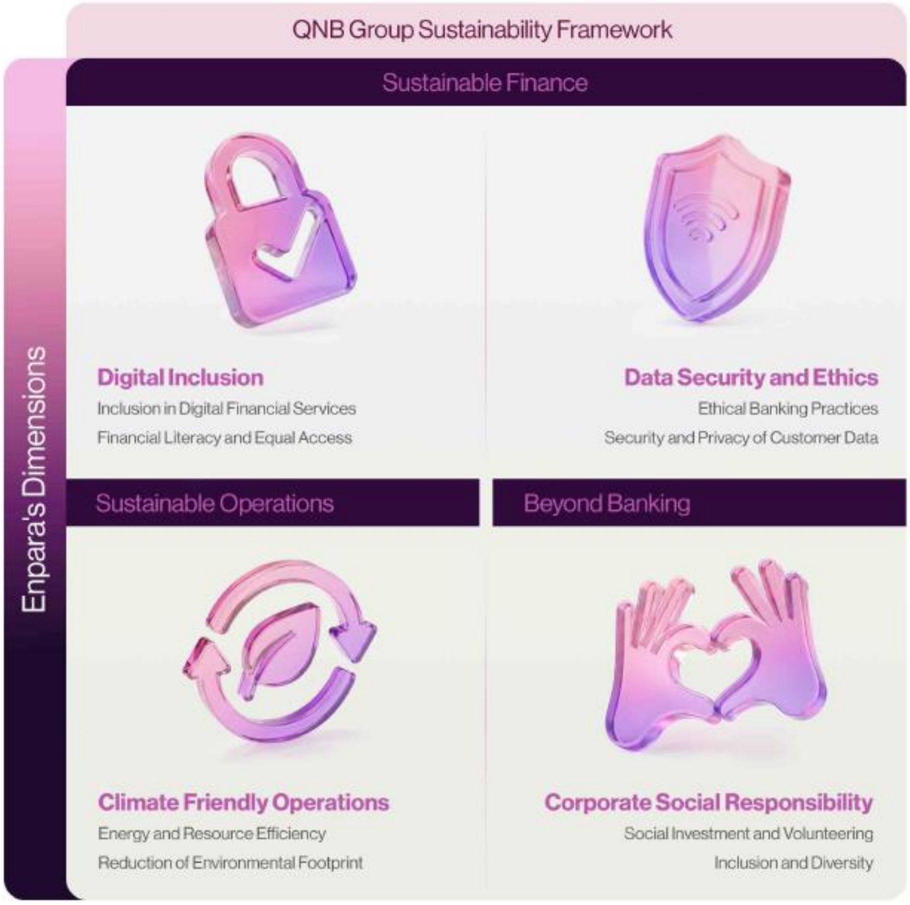

Figure 1. Enpara Bank's Sustainability Dimensions

6.1 Sustainable Finance

6.1.1. Responsible Products and Services

Enpara Bank offers products and services that promote financial inclusion and contribute to increased social benefit. The Bank continuously monitors evolving technological trends to develop its products and services with an innovative and customer-centric approach.

6.1.2. Sustainable Investment

Enpara Bank builds internal capacity to assess ESG-related risks and opportunities associated with both its own investments and those of its customers.

6.1.3. SMEs and Entrepreneurship

Enpara Bank supports the growth of SMEs and entrepreneurs by providing access to financing, while also taking various steps to increase participation in financial services among underserved or unbanked segments of society.

6.1.4. Responsible Customer Communication and Marketing Activities

Enpara Bank, in alignment with the QNB Group Responsible Marketing Statement and Customer Service Charter, provides transparent and responsible financial services to support customers in making informed financial decisions, and ensures clear, honest, and ethical communication in all customer interactions and marketing activities.

6.1.5. Customer Data Privacy and Information Security

Enpara Bank ensures the protection of customer information and respects the right to privacy in accordance with applicable regulations on confidentiality and data protection.

6.2. Sustainable Operations

“Sustainable Operations” refers to the integration of ESG criteria into business activities and the supply chain in order to ensure that Enpara Bank operates efficiently and in alignment with ethical values.

The Bank’s primary objectives under this scope are to further strengthen corporate governance and risk management practices, promote equality across the workforce, and reduce greenhouse gas emissions arising from its operations. This approach supports Enpara Bank’s position as an employer of choice, while also enabling the Bank to meet the growing expectations and requirements related to ESG performance.

Enpara Bank’s commitments under the Sustainable Operations pillar are outlined below.

6.2.1. Corporate Governance, Regulatory Compliance and Risk Management

Enpara Bank’s corporate governance framework is fundamental to achieving sustainable business success. In this context, the Bank is committed to the highest standards of integrity, accuracy, and accountability.

The Bank maintains a world-class corporate governance framework that ensures full compliance at all levels and enables the effective management of all risks. A robust risk management approach is a core component of Enpara Bank’s operations and plays a critical role in safeguarding the Bank’s customers, profitability, and reputation.

The centralized risk management structure is complemented by a strong culture of expertise and risk awareness, under which every Bank employee is responsible for identifying and managing potential risks within the scope of their duties.

To adapt to a continuously evolving regulatory environment, Enpara Bank implements strong corporate governance measures that integrate internal control, risk management, and regulatory compliance across the entire organization.

6.2.2. Anti-Bribery and Anti-Corruption

Enpara Bank in alignment with the QNB Group Anti Bribery and Corruption Policy Statement, adopts a zero-tolerance approach to bribery and corruption and acts with the highest standards of professionalism and integrity in all its business transactions and relationships.

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The Bank implements effective processes, controls, and systems to prevent corruption, money laundering, and the financing of criminal activities. To protect the Bank's image and reputation, Enpara Bank encourages the use of confidential whistleblowing mechanisms.

Bank employees are strictly prohibited from directly or indirectly requesting or accepting gifts from customers, suppliers, or third parties with whom the Bank has a business relationship. These rules also apply to gifts offered to employees' family members or close relatives. As a general principle, any gift must be modest in nature and must not create an obligation or expectation of reciprocity for the recipient.

6.2.3. Internal Misconduct Reporting and Employee Whistleblowing Hotline

In order to fulfill its responsibilities, the Audit Committee has established procedures and systems under this Procedure to enable all Enpara Bank employees to report, in writing—either via postal mail or electronic communication—any transactions, actions, irregularities, or misconduct that are:

- In violation of applicable laws and regulations,
- Inconsistent with applicable accounting records, practices, regulations, procedures, and principles, or
- Detrimental to the internal control environment or contrary to the Bank's procedures and instructions.

Enpara Bank employees should refer to the Internal Misconduct Reporting and Employee Whistleblowing Hotline Procedure (TAL.00967) for detailed information on the reporting process.

6.2.4. Human Rights and Labor Standards

Enpara Bank respects the human rights of all individuals affected by its operations and ensures fair and dignified treatment for everyone, without discrimination based on race, religion, gender, age, or language.

The Bank provides its employees with a working environment grounded in fairness, equality, and respect. This includes ensuring equal pay and development opportunities, establishing grievance mechanisms, preventing discrimination, and safeguarding occupational health, safety, and employee security.

Enpara Bank also expects its customers and suppliers to respect human rights and takes measures to prevent child labor and forced labor within its own workforce and throughout its supply chain.

6.2.5. Talent Management and Development

Enpara Bank offers continuous training and career development opportunities to attract, recruit, and retain top talent.

The Bank supports each employee in identifying their strengths and development needs in alignment with the required job competencies, and designs individualized development plans to help employees achieve their career goals.

6.2.6. Environmental Impacts of Operations

Enpara Bank operates in compliance with all applicable environmental laws and regulations and manages its direct environmental impacts through an internal environmental management system, which is continuously monitored and improved.

The Bank sets targets to reduce carbon emissions arising from its operations and to enhance resource efficiency, including energy, water, paper consumption, and waste management.

6.2.7. Responsible Procurement and Supply Chain

As part of its third-party risk management approach, Enpara Bank assesses the social and environmental performance of its suppliers prior to engagement and, where necessary, collaborates with third parties to ensure compliance.

At a minimum, the Bank expects all third parties to operate in compliance with applicable laws and regulations.

6.2.8. Compliance and Transparency

Within the Legal Compliance function, the Financial Crimes Compliance Department and the Tax Management and Operations Department work to ensure that Enpara Bank's products and services are not associated with any arrangement or structure that is known or suspected to have been established for the purpose of committing financial crimes, including tax evasion.

6.2.9. Revenue Management

The objective of Enpara Bank's revenue management approach is to support the Bank's business strategy and objectives, enhance efficiency, and maximize employee contribution by implementing fair and transparent remuneration practices aligned with the Bank's ethical values and internal balance.

This approach aims to strengthen employee engagement, motivation, and synergy, while encouraging performance- and target-based rewards at the individual, team, and organizational levels, and preventing excessive risk-taking that is disproportionate to the value created.

For detailed information, Enpara Bank employees should refer to the Revenue Management Procedure (TAL.00745).

6.3 Beyond Banking

6.3.1. Corporate Social Responsibility

“Corporate Social Responsibility” refers to Enpara Bank’s CSR activities carried out within the areas in which the Bank operates. The Bank’s objective is to reach broader segments of society and create positive social impact through its CSR initiatives.

Enpara Bank’s commitments under the **Corporate Social Responsibility** pillar are outlined below.

6.3.1.1. Social and Community Investments

Enpara Bank is committed to implementing initiatives and activities aimed at supporting socio-economic development across various areas, including children, youth, education, and nature.

6.3.1.2. Youth, Children, and Education

As part of its long-standing focus on youth, children, and education, Enpara Bank supports and implements a wide range of CSR projects.

Through various education- and program-based initiatives in these focus areas, the Bank aims to enhance the younger generation’s analytical thinking skills, academic knowledge, and artistic capabilities.

6.3.1.3. Volunteering

Enpara Bank supports and encourages its employees to participate as volunteers in initiatives coordinated by the Brand Management and Partnerships and Sustainability teams.

7. Implementation

As this Policy complements other relevant Enpara Bank policies, position statements, procedures, and guidelines established to promote sustainable business practices across the Bank, it should be read and assessed in conjunction with those documents.

8. Reporting, Disclosures and Transparency

In order to promote transparency within the banking sector, Enpara Bank publicly discloses its sustainability performance through its annual activity report and/or an independent sustainability report, in alignment with relevant local and international reporting standards.

The Bank ensures the establishment of standards that deliver the highest level of data quality in its sustainability reporting and uses this process as a driver for continuous improvement.

9. Stakeholder Engagement

Enpara Bank establishes communication and consultation channels to collect feedback from its key stakeholders—including employees, shareholders, customers, suppliers, and regulatory and supervisory authorities—and to understand stakeholder priorities and expectations.

10. Governance

Enpara Bank Sustainability Committee:
The owner of this Policy and the primary executive and decision-making body for sustainability matters is the Enpara Bank Sustainability Committee.

The Committee is co-chaired by the Head of Corporate Banking, International Banking and Cash Management, and the Director of Brand Management and Partnerships & Sustainability.

As the owner of the Policy, the Sustainability Committee is also responsible for reviewing the sustainability strategy and commitments, identifying priority topics, monitoring performance, and assessing ESG-related risks and opportunities. Where necessary, the Committee escalates key risks and opportunities to the Board of Directors.

Sustainability Team:
The Sustainability Team is responsible for managing all sustainability-related activities of the Bank, including sustainability reporting, the development of policies and procedures, the management of stakeholder expectations, and providing guidance and opinions on sustainability-related topics and inquiries.

The team also provides advisory support to the Sustainability Committee and senior management on sustainability matters.

Board of Directors and Corporate Governance Committee:
The Board of Directors and the Corporate Governance Committee support the Sustainability Committee in the effective implementation of the Bank's sustainability agenda.

At a minimum, the Board of Directors and the Corporate Governance Committee are informed annually, through the Enpara Bank Sustainability Committee, about the Bank's overall sustainability activities and performance.

Internal Systems (Risk Management, Internal Control and Compliance, Audit):
Internal systems provide guidance and support to the Sustainability Committee and the Sustainability Team, within their respective areas of responsibility, to ensure the proper adoption and implementation of the principles set out in this Policy.

11. Amendments

Any amendments made or to be made to this Policy are shared with the QNB Group Sustainability Team for review and feedback. However, the authority and responsibility for approving changes to this Policy rest with the Sustainability Committee.

The Board of Directors is informed annually of any amendments made to the Policy.

12. Effectiveness and Review

The Board of Directors is responsible for ensuring that this Policy is reviewed on an annual basis.