

Supplier Code of Conduct

Emirates NBD Group

May 2018

TABLE OF CONTENTS

1. Introduction	3
2. Scope.....	3
3. Compliance	4
4. Human Rights	4
5. Safety and Health.....	4
6. Environmental Sustainability.....	5
7. Business Integrity.....	5
8. Application	5
9. Reporting Violation	6
10. Policy Sign Off Sheet.....	6

1. INTRODUCTION

At Emirates NBD, a premier financial institution in the Middle East, we are committed to upholding the highest standards of integrity, responsibility, and ethical conduct in all aspects of our operations. Our Supplier Code of Conduct reflects these values and represents our commitment to promoting sustainable and responsible business practices.

We recognize that our suppliers play a crucial role in the success and reputation of our bank. Therefore, it is imperative that our suppliers align with our ethical standards, respect human rights, adhere to environmental sustainability practices, and engage in fair business conduct. This code outlines the requirements we set for our suppliers and the principles they must adhere to, as part of our business community. Through this code, we aim to foster a culture of transparency, accountability, and mutual respect, ensuring that our collective efforts contribute positively to the societies and economies we serve.

2. SCOPE

The Supplier Code of Code sets forth requirements for the suppliers with whom Emirates NBD Group does business, including their employees (including permanent, temporary, contract agency), and other third parties. It is the Supplier's responsibility to disseminate, educate and exercise diligence in verifying compliance of this Code to its employees, agents, and sub tier-suppliers. The code has been developed with recognition of the importance of the following ten principles of the UN Global Compact, organization to which Emirates NBD is a signatory, in the areas of human rights, labor, environment and anti-corruption, as well as in accordance with the Modern Slavery Transparency Act.

We require all our suppliers to adhere to the content of this code and demonstrate their commitment to the principles listed, in the context of jurisdiction of operations, services provided, size and nature of the selected suppliers.

Human Rights: Suppliers are required to:

Principle 1: Support and respect the protection of internationally proclaimed human rights; and

Principle 2: Make sure that they are not complicit in human rights abuses.

Labour Standards: Suppliers must uphold:

Principle 3: the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4: the elimination of all forms of forced and compulsory labour.

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in employment and occupation.

Environment: Suppliers must:

Principle 7: support a precautionary approach to environmental challenges.

Principle 8: undertake initiatives to promote environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle 10: Businesses must work against corruption in all its forms, including extortion and bribery.

3. COMPLIANCE

Emirates NBD Group requires the suppliers to adhere to all applicable laws and regulations. In addition, Emirates NBD reserves the right to verify compliance with the Code through internal or external assessment mechanisms.

4. HUMAN RIGHTS

Emirates NBD Group supports the United Nations ten principles of the UN Global Compact and requires the suppliers to respect all human rights, including labour rights, throughout its business activities. As a minimum:

- The Supplier must under no circumstances use, or in any other way benefit, from forced labour. The supplier shall only employ workers who are legally authorized to work in their facilities. Our efforts to combat modern slavery extends beyond just our own operations. We are committed to ensure that our partners and suppliers adhere to and implement similar standards. Suppliers must respect and protect the rights of individuals within their operations and ensure that they are not complicit in any human rights abuses. At Emirates NBD Group, we firmly denounce all forms of modern slavery, human trafficking and forced labour in line with the ratified ILO Convention 29 on Forced Labour and the Abolition of Forced Labour number 105. We believe that every individual has the right to freedom, dignity, and security, and we are wholly committed to upholding these principles within all aspects of our operations. We require all our suppliers to adhere to the highest standards and prohibit all type of harassments and abusive behaviours.
- Suppliers must, under no circumstances, engage in, or support any form of forced, bonded, indentured or involuntary labour. Usually characterized as any labour or service that is extracted from a person without their consent and is enforced using coercion or penalties. All workers, including temporary or migrant workers, should be employed on a voluntary basis only. Where it is found that suppliers have been the cause or contributed to human rights abuses or violations, they are expected to implement corrective actions immediately and ensure that the identified issues are addressed.
- The use of child labour is prohibited, in line with International Labour Organization (ILO) Convention 138 on the Minimum Age, and Convention 182 on the Elimination of the Worst Forms of Child Labour. The ILO Convention 138 indicates that no child below 15 years is allowed to work, subject to exceptions allowed by the ILO or national law. If the Supplier employs young workers.
- The Supplier must respect local and international labour laws and regulations concerning working hours and wages. Suppliers are required to at a minimum comply with the standards set by the local law. Compensation should at a minimum comply with UAE laws or industry standards governing minimum living wages, paid overtime, and other premium pay arrangements. Suppliers are required to provide their employees with clear information on their wages, ensuring that unfair deductions from wages as a disciplinary measure are not permitted.

5. SAFETY AND HEALTH

- Emirates NBD Group requires its supplier to uphold fundamental labour right and to ensure safe and healthy working conditions for their employees. This includes compliance with all applicable laws and regulations related to labour, as well as providing employees with safe, clean and healthy working

Supplier Code of Conduct - Emirates NBD

conditions, including easy and unrestricted access to hygiene facilities. Suppliers must uphold a health and safety management system aimed at minimizing the risks of any work-related injuries, accidents, illnesses and/or fatalities.

- All products and services delivered by the supplier must meet the quality and safety standards required by applicable law and /or as per the quality standards agreed with Emirates NBD Group.

6. ENVIRONMENTAL SUSTAINABILITY

- The Supplier must ensure that it obtains, keeps current, and follows the guidelines of all the required environmental permits and registrations to be at any time legally compliant.
- The Supplier must document and implement controls and mitigate significant environmental impacts as applicable.
- The Supplier is responsible to identify hazardous materials, chemicals, and substances, and ensure their safe handling, movement, storage, recycling, reuse, and disposal. All the applicable laws and regulations related to hazardous materials chemicals and substances shall be strictly followed. Supplier shall comply with material restrictions and product safety requirements set by applicable laws and regulations. Supplier shall ensure that key employees are aware of and trained in product safety practices.
- The Supplier is responsible to optimize its consumption of natural resources, including energy and water. Supplier shall implement and demonstrate sound measures to prevent pollution and minimize generation of solid waste, wastewater, and air emissions. Prior to discharge or disposal, supplier shall characterize and treat wastewater and solid waste appropriately and according to applicable laws and regulations.

7. BUSINESS INTEGRITY

Emirates NBD Group requires the supplier to comply with all applicable ethical trade laws and regulations.

- The Supplier will never, directly or through intermediaries, offer or promise any personal or improper advantage (bribery) to obtain or retain a business or other advantage from a third party.
- Supplier will not pay or accept bribes, arrange, or accept kickbacks and shall not take any action to violate any applicable anti-bribery laws and regulations.
- Supplier must report to Emirates NBD Group any situation that may appear as a conflict of interest.
- Supplier must maintain transparent records to demonstrate compliance with applicable materials, services, governmental and industry regulations.
- Supplier must take appropriate steps to safeguard and maintain confidential and proprietary information of its business and use such information only for the purposes authorized for the contractual agreement. In case of sub-contracting, sharing of confidential information should be made with the consent of Emirates NBD Group.

8. APPLICATION

Acknowledgement of the Code is a pre-requisite in every Emirates NBD Group transaction for supplying. Through the acceptance of this Code, the supplier commits that all its operation is subject to the provisions contained in

Supplier Code of Conduct - Emirates NBD

this Code. This Code or the demonstration of its compliance, does not create any third-party beneficiary rights for the supplier. The standards of the Code are in addition to, and not in lieu of, provision of any legal agreement or contract between suppliers and Emirates NBD Group.

9. REPORTING VIOLATION

The supplier must report any suspected violation of regulations, laws, and the code. Violations should be reported to Emirates NBD Group through our publicly available whistleblower hotline available at www.emiratesnbd.com.

10. POLICY SIGN OFF SHEET

Policy Name	Supplier Code of Conduct Policy
Effective Date	May 2018
Update Date	November 2023