

Emirates NBD Group

# Responsible Marketing Policy

2026



بنك الإمارات دبي الوطني  
Emirates NBD

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## 1. Purpose

This policy sets out the Emirates NBD Group (the Group) commitment to responsible, ethical, and sustainable marketing practices. It ensures that all communication is accurate, transparent, customer-centric, and fully compliant with regulatory standards.

The Group complies with the regulations issued by the Central Bank and other local and international regulatory bodies to protect consumers and contribute to the stability and integrity of the financial services sector. In line with this commitment, the Group shall adhere to the following principles and practices:

- Uphold high ethical standards in all marketing, sales, and pricing activities, and actively monitor practices to ensure compliance with applicable laws, regulations, and internal policies
- Prevent and prohibit abusive, misleading, or unfair sales, marketing, and pricing practices, including conduct that may result in consumer harm or financial distress
- Promote transparency, clear disclosure, and fair competition, ensuring that communications are accurate, balanced, and non-discriminatory, and that customers are provided with sufficient information to make informed decisions

## 2. Scope

This policy applies to all entities of the Group including business, support, and control units as well as subsidiaries, and all offices and branches, and related parties in or outside of the United Arab Emirates. In case of conflicts between the policy and regulatory requirements (due to changes in applicable laws) the regulatory requirements for the respective locations would prevail.

## 3. Governance Structure Roles and Responsibilities

For the Group, the overall responsibility of responsible marketing resides with the Board of Directors. To ensure consistency and prudent management, the responsibilities have been sub-divided between the following key governance bodies of the organisation.

### Board Risk Committee (BRC)

The Board Risk Committee, in the context of this policy, has the following responsibilities:

- Review and approval of this policy
- Ratify any future changes to this policy document

### Group Risk Committee (GRC)

The Group Risk Committee, in the context of this policy, has the following responsibilities:

- Review and approve this policy for notification to BRC

### Group Environment Social and Governance (ESG)

Group ESG, in the context of this policy, has the following responsibilities:

- Design, own, and maintain the Group Responsible Marketing Policy and related frameworks, ensuring alignment with applicable Central Bank regulations and other local and international regulatory body requirements.



- Act as the central point of contact for Business and Support Units on matters related to the interpretation and application of this Policy, including responding to queries, providing guidance on responsible marketing practices and advising on ESG-related considerations.
- Review and approve ESG-related claims for internal as well as external communications, ensuring they are backed by data and consistent with this policy.
- Alignment with global and regional sustainability standards and frameworks.

## Group Marketing

Group Marketing, in the context of this policy, has the following responsibilities:

- Ensure that all marketing communications, campaigns, and promotional materials are designed and executed in a fair, clear, accurate, and non-misleading manner, in line with this Policy and applicable regulatory requirements
- Ensure Group ESG reviews and approves all internal and external communications related to ESG claims.
- Ensure that marketing practices comply with applicable Central Bank and other local and international regulatory body regulations, market conduct standards, and internal policies relating to consumer protection and ethical communications
- Ensure that all marketing content accurately reflects product features, risks, benefits, pricing, and eligibility criteria, and provides customers with sufficient information to make informed decisions

## Retail Banking and Wealth Management (RBWM)

RBWM, in the context of this policy, has the following responsibilities:

- Act as the primary business owner for responsible marketing activities within RBWM, ensuring that customer communications comply with this policy and applicable regulatory requirements
- Ensure that customer communications with respect to RBWM marketing activities are clear and transparent while disclosing limitations if any
- Ensure sustainability related customer communications are reviewed and approved by Group ESG

## Group Legal

Group Legal, in the context of this policy, has the following responsibilities:

- Advise on wordings or disclaimers with respect to marketing communications, campaigns and promotional material as and when requested by Group Marketing or Group ESG

## Group Compliance

Group Compliance, in the context of this policy, has the following responsibilities:

- Assess compliance with applicable regulations and advise on regulatory gaps, if any

## 3. ESG Alignment

The Group integrates ESG considerations into its marketing activities to promote ethical conduct, protect consumers, and support sustainable business practices.

### 3.1 Environmental Awareness (E)

- Preference for digital-first campaigns to reduce paper and physical collateral
- Print marketing to use sustainable suppliers and recyclable materials when required
- Campaigns that encourage sustainable finance products (e.g., green loans, ESG-linked investments) will be prioritised and highlighted

### 3.2 Social Responsibility (S)

- Marketing practices designed to protect consumers by ensuring fairness, clarity, and accessibility
- Financial literacy elements incorporated in campaigns where relevant, supporting SDG 8: Decent Work and Economic Growth
- Accessibility campaigns delivered in English, Arabic or applicable regional languages to reach diverse communities
- Avoidance of misleading offers, hidden charges, or practices that may create financial distress

### 3.3 Governance (G)

- Full compliance with Central Bank and other local and international regulations as may be applicable
- Mandatory inclusion of legal entity name and disclosure statements in all communication
- Internal governance requiring Compliance and Legal review before campaign launch
- Biannual review of ESG related marketing practices to be reported to Group ESG by Group Marketing

## 4. Core Principles of Responsible Marketing

### 4.1 Transparency

- Clear, accurate, and non-misleading representation of all products and services
- Disclosure of key product features, risks, eligibility, and charges upfront

### 4.2 Terms & Conditions (T&Cs)

- All promotions must include direct access to relevant T&Cs
- Any updates to permissible changes must be communicated promptly

### 4.3 Consumer Protection

- No exaggeration of benefits, false urgency, or hidden exclusions
- Product-specific disclaimers included (e.g., “Past performance is not indicative of future results” for Wealth Management)

### 4.4 Product-Specific Standards

- Cards: Mandatory disclosure of APR, fees, repayment obligations
- Loans: Illustrative repayment examples with total cost of borrowing
- Deposits (RLTB): Clear statements of maturity, penalties, and renewal terms
- FX: Rate disclosures and risks associated with volatility
- Business Banking: Clarity in SME offers; no complex or ambiguous terms
- Wealth Management: Risk disclaimers, performance limitations, and conflict of interest statements

#### 4.5 Collateral & Messaging Standards

- Mandatory disclaimer:  
“This communication is for informational purposes only, subject to applicable terms and conditions, and does not constitute financial advice.”
- Inclusion of ESG-friendly messaging where relevant (e.g., promoting sustainable finance solutions)

#### 4.6 Monitoring, Reporting & Accountability

- Biannual review to verify compliance with this policy to be conducted by Group Marketing
- Annual reporting of marketing governance incorporated into Emirates NBD's ESG disclosures
- Non-compliance may result in:
  - Campaign withdrawal,
  - Disciplinary action,
  - Regulatory escalation

#### 4.7 Confidentiality and Personal Data Protection

The Group safeguards the privacy and security of customers' personal data when conducting marketing activities. Personal data processed for marketing purposes is used in accordance with relevant legislation, for specific and legitimate purposes, and in a manner that is limited and proportionate to the purpose. Where explicit consent is required; customers' consent is obtained; customers' preferences regarding marketing communications are taken into account and they are provided with the means to manage these preferences. The Group takes the necessary technical and administrative measures to ensure the security of personal data and safeguards data privacy in activities carried out with third parties.

#### 4.8 Transparent and Responsible Marketing

The Group is committed to maintaining transparency and integrity in all customer interactions, ensuring that its marketing practices foster trust and fairness. The Group strives to achieve a healthy balance between meeting the needs of its customers and fulfilling the Group's business objectives. Guided by the Group Code of Conduct, the Group is dedicated to:

1. Marketing financial products and services that are suitable, clear, and easy to understand, while upholding standards that promote a fair, balanced, and trustworthy customer-bank relationship
2. Providing clear and accurate information to ensure customers are fully aware of the characteristics, risks, commission fees, and any other direct or indirect costs associated with the products and services offered
3. Ensuring that its representatives make responsible enquiries and gather adequate information to assess the customer's financial goals, offer appropriate advice, and present suitable options
4. Guaranteeing the confidentiality of all restricted information, except where the Group has the customer's consent or disclosure is required by law

The Group is also committed to mitigating any major negative impact on consumers and end users through the following practices:

1. Products and services marketed and sold should be designed to meet the needs of identified consumer groups and targeted accordingly
2. Mandating employees to complete the required regulatory training without exception to ensure full compliance with regulatory standards and build a strong awareness of the policies that govern the Group

## 6. APPENDICES

### 7.1. Table of Abbreviations

Abbreviation	Description
The Group	Emirates NBD Bank (P.J.S.C.) and all of its subsidiaries, including international offices
Emirates NBD, the Bank	Emirates NBD Bank (P.J.S.C.) does not include subsidiaries/DenizBank
UAE	United Arab Emirates

### 7.2. Policy Mandatory Information

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### 7.3. Revision History

Author	Version	Date	Department / Reviewer	Description
Zahra Alsuwaidi	1.	February 2026	Group ESG	First Version

### 7.4. Policy Sign-off Sheet

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Proposed by	Vijay Bains		
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Owner(s):	Name	Designation	Signature
	Zahra Alsuwaidi	Manager - ESG Strategy and Governance	Zahra Alsuwaidi
	Vijay Bains	GCSO	
Approved by	Group Risk Committee (GRC) Board Risk Committee (BRC)		
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