

Emirates NBD Group

# Human Rights and Labour Practices Policy



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Emirates NBD

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## 1. INTRODUCTION AND PURPOSE

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This document outlines the commitment of Emirates NBD Bank (P.J.S.C.) (the “Bank”) and its subsidiaries (together the “Group” or “Emirates NBD”) to human rights and practices that respect human dignity including labour rights.

The Group developed this Human Rights and Labour Practices Policy as part of its efforts to protect the rights of all its employees, including, communities, customers, and suppliers by aligning itself with the best global standards and procedures. The Group embraces diversity, fosters inclusivity, and empowers its teams, standing together in ensuring that each voice is heard, each step is mindful, and each endeavour is embarked upon with the utmost consideration for all stakeholders. In addition, the Policy compliments Emirates NBD’s broader CSR/ ESG Communities strategy through alignment with its initiatives and community volunteering activities.

The Group takes inspiration from its materiality analysis and identification of the most material ESG topics and priorities that drive meaningful action and collaboration. The Group adheres to international standards and guidelines regarding human rights and labour, such as Universal Declaration of Human Rights, International Labour Organisations conventions ratified by the UAE. The Group is a signatory to the United Nations Global Compact respecting the 10 principles including the freedom of association and collective bargaining, Modern Slavery Transparency Act and other applicable anti-slavery legislation, as well as the UN Sustainable Development Goals.

## 2. DEFINITION OF HUMAN RIHGTS

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Human rights are the inherent and equal rights of every person, regardless of origin, nationality, sex, religion, or social status. They include the rights to life, dignity, liberty, security, equality before the law, fair trial, privacy, freedom of thought, expression, religion, and association, as well as protection from torture, slavery, and arbitrary arrest. Recognised by constitutions, laws, and international agreements, these rights may only be limited by law for legitimate reasons such as public safety, national security, public health, or the protection of others, and always under principles of necessity and proportionality. At their core, human rights safeguard the dignity and equality of all people while coexisting with civic duties to respect the law and the common good.

## 3. SCOPE

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The Group’s Human Rights Policy and Labour Practices, and the underlying commitments apply to all employees of the Group, including its subsidiaries, branches, and representative offices across all countries of operations. In accordance with relevant local guidelines and requirements, the international entities can define specific addendum to address local regulatory and compliance requirements that are not covered by this Policy. All employees are expected to adhere to and respect this Policy. All stakeholders who have a relationship with the Group such as customers and suppliers are also expected to respect the Human Rights and Labour Practices Policy.

As part of the Group’s efforts to tackle human rights management related to ESG and identify material topics, the Group conducted a materiality analysis in 2024. This analysis identified key topics under the Environmental, Social, and Governance (ESG) pillars that play a pivotal role in shaping the Group’s sustainability strategy.



Human rights, fair and safe labour was identified as one of the most important management topics to stakeholders during the Group's 2024 materiality analysis, with 12.94% of respondents identifying human rights as a material topic. This underscores the critical importance of this material topic to the Group.

The Group's commitment to human rights and safe labour practices is reflected in its efforts to address systemic inequalities and promote societal change. The Group is fully aligned with the UNGC principles covering human rights, labour, environmental responsibility, and anti-corruption, among others. As part of these commitments, the Group maintains a visible and active approach towards addressing systemic inequalities and promoting positive societal change, aiming for a lasting social and business impact. Furthermore, the Group seeks to uphold human and labour rights not only within its own operations but also across its relationships with suppliers, customers, and the local community.

At the core of our operations is the Group's Code of Conduct, which applies to all employees and serves as a foundation for both our daily practices and long-term goals. This Code not only highlights the Group's dedication to protecting employee rights but also ensures compliance with UAE federal laws prohibiting forced labour.

Beyond this, the Group is dedicated to fair wages and reasonable working hours, prioritising the well-being of all our workforce. By embedding these values into our operations, we aim to set a standard for ethical banking, where human and labour rights are not simply policies but integral values that shape everything, we do.

In addition, we hold our partners, suppliers, and associated entities to the same standards, ensuring they respect and uphold these principles. A critical part of this is the Supplier Code of Conduct, which establishes clear requirements around environmental responsibility, fair labour practices, and ethical governance. This Code aligns with international frameworks, such as the UN Global Compact and the Modern Slavery Transparency Act and other applicable anti-slavery legislation, mandating suppliers to extend these standards across their networks.

Furthermore, this Policy extends to stakeholders through our supplier onboarding and evaluation process. Suppliers are required to demonstrate that they have obtained, and are in full compliance with, all necessary environmental permits and registrations. In addition, they must ensure that their employees receive adequate training in product safety practices.

To reinforce these commitments, the Group provides a comprehensive set of programs to both employees and contractors. These programs are designed to embed the principles of the Code of Conduct while also building awareness of critical social and ethical practices. Examples include:

- 1) Disability Etiquette
- 2) Ethical Sales Principles
- 3) Handling Customer Complaints
- 4) Serving Customers of Vulnerable Groups
- 5) American Sign Language
- 6) Debt Counselling

#### 4. GOVERNANCE STRUCTURE, ROLES AND RESPONSIBILITIES

##### **Board Risk Committee (BRC)**

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



- Approve 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 the Group Human Rights and Labour Practices Policy for notification to the BRC.

### **Group Environment Social and Governance (ESG)**

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

- Design and own policies, procedures and processes relating to human rights and labour practices.
- Establish a mechanism for units to report human rights and labour practices issues to Group ESG.
- Receive and review significant human rights and labour practices events or issues as identified by key owners and 2nd line of defense functions.
- Endorse and monitor human rights and labour practices risk mitigation action plans.

### **Group Human Resources**

- Act as the custodian of employee-related Human Rights and Labour Practices issues through the Employee Relations function.
- Drive the relevant initiatives to address the challenges arising from employee human rights management and communicate the outcomes to Group ESG when applicable.
- Share with Group ESG, as appropriate, updates on significant human rights and labour practices events upon request.

### **Retail Banking and Wealth Management (RBWM)**

- Inform Group ESG of any new disciplinary actions resulting from non-compliance with the Human Rights and Labour Practices Policy.

### **Group Legal**

- Notify Group ESG of any changes or amendments to the Group-wide definition of the Human Rights and Labour Practices Policy.

### **Group Sourcing**

- Ensure that suppliers sign and comply with the Emirates NBD Supplier Code of Conduct, which includes human rights and labour practices standards.



- Provide Group ESG with supplier information or documentation relevant to human rights and labour practices upon request.
- Escalate to Group ESG any significant supplier-related human rights and labour practices concerns identified during sourcing or vendor management processes.

### Group Marketing

- Ensure that Group ESG has aligned the Policy to the right remediation actions for customers on any risks related to financial literacy.

## 5. PROTECTION OF HUMAN RIGHTS AND LABOUR PRACTICES

The Group is committed to protecting human rights and adhering to the best labour practices of our employees and upholding these standards across our value chain including operational, upstream, and downstream activities.

Operational	Group Employees
Upstream	Suppliers
Downstream	Customers & Communities

The Group alignment reflects through the following actions:

### 5.1. For Employees

- **Discrimination and Harassment**
  - Any form of bullying, harassment, or discrimination based on nationality, gender, age, disability, ethnicity, pregnancy or maternity, marital status or any other characteristic protected by applicable law is strictly prohibited.
- **Human trafficking/ child labour**
  - The Group has a strong commitment in preventing human trafficking, forced labour, and child labour within its organisation and value chain.
- **Health and Safety**
  - The Group abides by the rules and regulations that safeguards health, safety, and wellbeing of its employees, customers, and visitors.
- **Gender and Diversity**
  - The Group creates a culture that values and respects gender diversity, ensuring that its programs support all employees in achieving their full potential. The Group does not tolerate any unfair treatment or prejudice based on protected characteristics (nationality, gender, age, disability, ethnicity, marital status etc). This includes biased hiring (except national hiring), promotions, performance management, transfer, disciplinary action including termination



- **Equal Remuneration**

- The Group is dedicated to promoting equal remuneration and ensuring fairness in compensation practices for all employees irrespective of gender, ethnicity, or any other characteristics.

- **Fair Wage and Working Hours**

- The Group is committed to fair wages and reasonable working hours as it strongly believes in prioritising the wellbeing of its employees. Standard working hours are a maximum of 8 hours inclusive of a cumulative one-hour break as per the guidelines of the UAE Central Bank. Flexibility is provided for reduced hours in specific cases, and this may differ across countries of operation in line with local regulations.

- **Leave and Absence**

- The Group recognises the importance of employee satisfaction and wellbeing, and therefore provides various types of leave (e.g. annual, maternity, and sick leaves) which cover salary payments and other associated benefits.

- **End of Service Benefits**

- The Group offers end of service benefits to eligible permanent employees as a token of appreciation for their contributions, with gratuity calculated at 60% of the latest contractual pay based on years of service. The maximum payable is capped 24 months gross salary, subject to clearance of any outstanding dues.

## 5.2. For Suppliers

- The Group requires its suppliers to sign and comply with the Emirates NBD Supplier Code of Conduct. By doing so, suppliers are deemed to be in full alignment with this Human Rights Policy.
- The Supplier Code of Conduct incorporates requirements consistent with the ten principles of the United Nations Global Compact covering human rights, labour, environment, and anti-corruption, as well as the Modern Slavery Transparency Act. Compliance with the Code is considered sufficient evidence of suppliers' commitment to respect and uphold these principles.
- Through adherence to the Supplier Code of Conduct, suppliers confirm that they will uphold fundamental labour rights, safeguard the safety of their employees, and ensure healthy working conditions, including unrestricted access to hygiene facilities.
- As part of the Group's protection of labour practices, suppliers must respect international laws concerning working hours and wages, and at a minimum comply with UAE laws or applicable industry standards.

### 5.3. For Customers

- The Group ensures fair treatment to all its customers and offer them designated products and services that meets the needs of identified consumer groups.
- The Group is focused on long- term value and delivering trust to its customers. As part of its commitment to upholding this trust, it is committed to maintaining transparency with its customer's privacy data protection measures, including how data is collected, stored and shared.
- It is the Group's responsibility to ensure the accommodation of different segments of society regardless of age, gender, disability, or any other characteristics.

### 5.4. For Local Community

- As a responsible financial institution, the Group is committed to the highest standards of Anti-Money Laundering (AML) Compliance, Counter-Terrorism Financing (CTF), aligning itself with the Wolfsberg Group's Financial Crime Principles.
- As a member of the local community, the Group has launched a series of community initiatives aimed at empowering the different segments of the community, which support the social and financial inclusion of People of Determination.
- The Group creates value by educating the public on the financial wellness to help them better manage their personal finances, covering topics such as saving, spending, borrowing, and investing as well as vigilance against fraud attacks.

## 6. HUMAN RIGHTS MANAGEMENT

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The human rights management identified hereinafter are topics that the Group has identified through its materiality analysis. These topics concern both employees and suppliers, and include the following human rights management topics: Health and safety, employment dispute, forced labour/ work overtime, among other topics. The below highlights the mitigation measures and remediation actions implemented by the Bank to address potential sources of risk arising from foreseeable challenges that Group employees, customers, and suppliers may encounter. These measures are proactive, continuously monitored, and may be adapted to ensure they remain responsive to the evolving needs of the Group's stakeholders.



## 6.1. Human Rights Management: Employees

Management	Source of Risk	Mitigation Measures	Remediation Actions
Health and Safety	<ul style="list-style-type: none"> <li>• Workplace</li> <li>• Spread of diseases and infections</li> <li>• Wellbeing (physical and mental wellbeing)</li> </ul>	<ul style="list-style-type: none"> <li>• Provide easy access to healthcare through different initiatives.</li> <li>• Provide mental health support options.</li> <li>• Build awareness and educate on various topics of wellbeing.</li> <li>• Collect feedback from employees regularly.</li> </ul>	<ul style="list-style-type: none"> <li>• On site wellness centre and doctor consultation facilities, where staff can see a doctor in person.</li> <li>• Annual flu shots where the Group offers free on-site flu vaccines to all employees and their registered dependents across the UAE.</li> <li>• Employee Assistance Program for support on Mental Health, Financial and Legal information.</li> <li>• An annual survey is conducted for employees to express their opinions through the Souwti survey, and it covers various aspects of the employee's experience including flexibility, care, work-life balance, empowerment, etc.</li> <li>• The Group offers mentoring and coaching programs for its employees on an annual basis where they can get the opportunity to be supported by a trained professional who can help them develop both personally and professionally.</li> <li>• Employee Resource Groups for community building and wellbeing.</li> <li>• Offer a range of events and education to support wellbeing.</li> </ul>
Employment Dispute	<ul style="list-style-type: none"> <li>• Poor communication or supervision</li> <li>• Misunderstanding between employees and management</li> </ul>	<ul style="list-style-type: none"> <li>• Have internal communication channels in place, so that employees will be able to seek assistance.</li> <li>• Clarify complaint procedures.</li> <li>• Promote fair treatment of employees.</li> </ul>	<ul style="list-style-type: none"> <li>• Launched the Speak Up Programme which provides a safe, transparent platform where employees can report grievances via email or for, and the Employee Relations Team reviews and investigates the case providing follow-up updates and recommending corrective actions.</li> </ul>



		<ul style="list-style-type: none"><li>• Set up clear HR systems.</li></ul>	
Forced Labour/Work Overtime	<ul style="list-style-type: none"><li>• Work over-load</li><li>• Temporary business surges or staff shortages</li><li>• Demands from group related events</li></ul>	<ul style="list-style-type: none"><li>• To abide with the laws that respect human rights and dignity.</li></ul>	<ul style="list-style-type: none"><li>• The Group strictly prohibits the violation of human dignity and recognises the utmost importance of staying in line with relevant local regulations.</li><li>• The Group has a strong commitment towards preventing:<ol style="list-style-type: none"><li>1. Human trafficking.</li><li>2. Forced labour.</li><li>3. Child labour.</li></ol></li></ul>

## 6.2. Human Rights Management: Suppliers

Management	Source of Risk	Mitigation Measures	Remediation Actions
Corruption	<ul style="list-style-type: none"> <li>Bribery</li> <li>Conflict of interest / personal gain</li> </ul>	<ul style="list-style-type: none"> <li>Require suppliers to acknowledge and comply with the Emirates NBD Supplier Code of Conduct, which prohibits bribery, corruption, and conflicts of interest.</li> <li>Conduct risk-based due diligence on suppliers (e.g., higher scrutiny only for high-risk categories, geographies, or spend levels).</li> <li>Include anti-bribery and anti-corruption clauses in supplier contracts.</li> </ul>	<p>The Group will take corrective action if a supplier is found to be in breach of anti-bribery and corruption obligations, up to and including termination of the business relationship.</p> <p>Suppliers must not engage in the following activities:</p> <ol style="list-style-type: none"> <li>Offering, giving, soliciting, or accepting bribes or improper advantages.</li> <li>Using third-party providers with known poor anti-bribery standards without prior approval.</li> <li>Processing or facilitating funds that are reasonably suspected of being linked to bribery or corruption.</li> </ol>
Negative Impacts on the Environment	<ul style="list-style-type: none"> <li>Use of non-sustainable materials</li> <li>Lack of environmental compliance</li> </ul>	<ul style="list-style-type: none"> <li>Require suppliers to comply with the Emirates NBD Supplier Code of Conduct and relevant environmental regulations.</li> <li>For higher-risk categories, request evidence of environmental certifications (e.g., ISO 14001) or equivalent</li> </ul>	<ul style="list-style-type: none"> <li>Suppliers found in breach of environmental obligations may be required to implement corrective action plans; continued non-compliance may lead to suspension or termination of the relationship.</li> </ul> <p>Suppliers must not:</p> <ol style="list-style-type: none"> <li>Use banned or restricted materials under UAE or international law.</li> <li>Operate without the necessary environmental permits or approvals.</li> <li>Ignore Group requests for information or cooperation on</li> </ol>



		<p>practices.</p> <ul style="list-style-type: none"><li>• Include environmental obligations in supplier registration, focusing on sustainable sourcing and waste reduction.</li></ul>	<p>sustainability initiatives.</p>
<p>Forced Labour/Work Overtime</p>	<ul style="list-style-type: none"><li>• Personal reasons</li><li>• Lack of manpower</li></ul>	<ul style="list-style-type: none"><li>• Require suppliers to comply with UAE labour law and international standards on working conditions.</li><li>• Ensure supplier contracts explicitly prohibit the use of forced labour and mandate that overtime is voluntary and compensated according to law.</li><li>• Request suppliers to maintain transparent records of worker contracts, working hours, and wage payments (to be made available upon request).</li></ul>	<ul style="list-style-type: none"><li>• Any supplier found engaging in forced labour or unlawful overtime practices will be required to take immediate corrective action.</li><li>• Non-compliance may lead to suspension of new business, withholding of payments, or termination of the supplier relationship.</li></ul> <p>Suppliers must not:</p> <ol style="list-style-type: none"><li>1. Employ workers without legal authorisation to work.</li><li>2. Retain workers' passports, personal documents, or restrict freedom of movement.</li><li>3. Coerce or penalise workers for refusing overtime.</li></ol>

### 6.3. Human Rights Management: Customers & Communities

Management	Source of Risk	Mitigation Measures	Remediation Actions
Lack of Accessibility to Products and Services	<ul style="list-style-type: none"> <li>Disability</li> <li>Age</li> </ul>	<ul style="list-style-type: none"> <li>To provide services and products that are tailored to different segments of society regardless of age, disability, or any other characteristics.</li> </ul>	<ul style="list-style-type: none"> <li>The Group is dedicated to offering accessible banking services for people of determination. Currently, 313 branches globally are fully equipped with features specifically designed to meet their needs.</li> <li>The Group has launched the Liv Young Account for children and teens aged 8 to 17, enabling parents to open account on their behalf. This initiative helps parents and children manage finances while fostering financial literacy from a young age.</li> <li>The launch of Exchanger volunteer program where volunteers from different backgrounds can take part in activities that include tree planting, beach clean-ups, and eco-awareness campaigns. Children aged 10 to 18 can also take part in these volunteering initiatives.</li> </ul>
Limited Financial Literacy	<ul style="list-style-type: none"> <li>Lack of access to financial education</li> <li>Low levels of financial awareness among customers</li> </ul>	<ul style="list-style-type: none"> <li>Make sure that the Group provides services that help customers gain financial knowledge and improve their understanding of banking products.</li> </ul>	<ul style="list-style-type: none"> <li>The Group has launched a series of campaigns and workshops that are designed to empower individuals with the essential knowledge related to financial literacy, digital banking, and personal finance management.</li> <li>Dedicated Consumer Education and Awareness department has launched research to determine the financial literacy index of the country. The index and findings are now being used to feed into campaign messaging to drive intentional impactful campaigns.</li> <li>Direct customer communications on a monthly basis is ongoing – sharing insights and financial tips to our customers to improve financial decisions.</li> <li>Pilot programme ran in Q1 to improve the overall savings of our customers resulting in positive shifts towards increased savings.</li> <li>Ongoing consumer educational sessions across organisation as BAU.</li> </ul>



Data Privacy Protection	<ul style="list-style-type: none"><li>• Data leakage</li></ul>	<ul style="list-style-type: none"><li>• Adhere to the highest data security standards and maintain transparency with customers regarding how their data is being collected, stored, and used.</li></ul>	<ul style="list-style-type: none"><li>• The Group aligns itself with the best standards to mitigate data security and privacy risks by complying with the National Institute of Standards and Technology Cybersecurity Framework and the International Security Forum (“ISF”) Standard of Good Practice for Information Security.</li><li>• The Group has a private policy in place in which it discloses how they collect, use, and transfer the customer’s private information.</li></ul>
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## 7. 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
AML	Anti-Money Laundering
CTF	Counter-Terrorism Financing
UAE	United Arab Emirates
UN	United Nations
UNGC	United Nations Global Compact
UNSDG	United Nations Sustainable Development Goals

### 7.2. Policy Mandatory Information

Name	Description
Document Title	Human Rights and Labour Practices Policy
Document Classification	Governance
Document Sub classification	Operational Governance
Original Publish Date	26th November 2025
Policy Producing Business Line	Group ESG
Policy Producing Department or Function	Group ESG
Document Author	Zahra Alsuwaidi
Document Approver(s) name of the person or department	Group Risk Committee (GRC) Board Risk Committee (BRC)
Document Contact(s) (PM)	Zahra Alsuwaidi Fatma Albastaki
Last Review Date	7th October 2025
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Legal & Regulatory Requirements	No
Effective Date	26th November 2025

### 7.3. Revision History

Author	Version	Date	Department / Reviewer	Description
Zahra Alsuwaidi	1.	September 2025	Group RBWM: Priscilla Fernandes; Group Sourcing Weaam Abdou; Group HR: Sheryl Decipeda, Aibel Gutierrez & Naila Sarwar; Group Legal: Mohammad Kazim & Jenny Grainger; Group Marketing: Dana Kamber & Namitha Ashok; Operational Risk; Yogush Sujith; DenizBank: Altan Hasan & Turgut Kortemur	First Version

### 7.4. Policy Sign-off Sheet

Policy Name	Human Rights and Labour Practices Policy		
Proposed by	Vijay Bains		
Effective Date	26th November 2025		
Owner(s):			
	Zahra Alsuwaidi	Manager – ESG Strategy and Governance	Zahra Alsuwaidi
	Fatma Albastaki	Lead – ESG Reporting	Fatma Albastaki
Approved by	Group Risk Committee (GRC) Board Risk Committee (BRC)		
Approved Date	7th October 2025		
Version	Version 1		

### 7.5. Deviations

Any non-compliance or deviation from the Policy must be approved in writing by the highest designated approving authority, in accordance with the Bank's governance and policy management framework. Any such deviation must be documented, justified, and subject to review.