



بنك الإمارات دبي الوطني
Emirates NBD

Emirates NBD Group

Emirates NBD Group Policies

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Table of Contents

1.	INTRODUCTION.....	3
2.	OBJECTIVE	3
3.	SCOPE	3
4.	POLICY CONTENT	3
	Compliance with Laws and Regulations	3
	Confidentiality of Information and Data Privacy	3
	Anti-Bribery and Anti-Corruption Statement	5
	Conflict of Interest Statement	6
	Anti-money Laundering Statement.....	7
	Insider Trading.....	9
	Anti-Trust and Anti-Competitive Practices.....	9
1.1	4.10. Commitment to addressing major business risks	9
1.2	4.11. Group Tax Approach	9
1.3	4.12. Treating Customers Fairly – Responsible Products and Services	9
1.4	4.13. Financial Inclusion Statement	10
5.	RELEVANT POLICIES	16

1. INTRODUCTION

As we embark on a path driven by principles, ethics, and a commitment to excellence, this document serves as testament of our values, defining who we are and what we stand for. Within these pages lies a reflection of our dedication to integrity, trust, and responsible banking practices. United by a shared vision, our actions are bound by accountability, rooted in the belief that every interaction, every decision, and every relationship we nurture holds the power to shape a brighter, more sustainable future.

Embracing diversity, fostering inclusivity, and empowering our teams, we stand together in ensuring that each voice is heard, each step taken is mindful and each endeavour is embarked upon with the utmost consideration for our customers, communities, and environment. Diversity is embedded in all layers of our organisation, we are committed in taking diversity factors such as gender, race, or ethnicity, as well as nationality or cultural background into consideration during all hiring processes. We challenge ourselves to be the pioneers of change, raising the bar of ethical conduct and redefining the boundaries of responsible banking.

2. OBJECTIVE

Emirates NBD expects high standards of integrity along with professional and personal behaviours from its employees, both within and outside its premises that benefits the Group's reputation and protects its interests as well as those of its consumers. The purpose of this document is to lay down the standards of professionalism and personal conduct expected by the bank from its employees, standards in respect to relations with clients, investors and other third parties such as suppliers and vendors.

3. SCOPE

This policy document and the underlying commitments apply to all employees of the Emirates NBD Group. Subsidiaries, branches, and representative offices may seek specific addendums to this document to reflect local regulatory requirements and business practices. This document highlights the set minimum standards and internal comprehensive policies are internally available for several sections. Where local laws are more stringent than the standards contained herein, then such requirements should be applied in addition to the standards set in this document and internal policies. Dedicated sections in this policy are applicable to suppliers and third parties, these sections are specifically highlighted within the body of this document.

4. POLICY CONTENT

4.1. Compliance with Laws and Regulations

Employees are required to comply with the laws and regulations applicable to them in their capacity as citizens or residents of a country and as employees of the Group. Breaches of the applicable laws and regulations are punishable by appropriate actions. Employees are also expected to ensure that the integrity of the Group's records that they are responsible for, is beyond doubt.

4.2. Confidentiality of Information and Data Privacy

Our most important asset is you and your trust. We are committed to providing you with exceptional banking services and want you to have trust and confidence in the way we use your personal data. Our Data Privacy Notice is publicly available on our corporate website at www.emiratesnbd.com.

What data do we collect?

- a. **Personal Data:** information that we collect and process about you depending on the products or services you obtain or receive. Typically, we process the following categories of information provided by you about yourself:
 - Personal details: title, name, gender, date, and place of birth etc.
 - Contact: email address, residential or business address and contact telephone number.
 - Identity: KYC documents; etc.

- b. **Technical data:** information collected when you use our website or apps:
- Technical information, such as your IP address and device ID.
 - Information about your visit, such as your URL and website interaction.
 - Location data, with your approval.

We refrain from collecting other type of data than the categories mentioned in our Data Privacy Policy- publicly available on our corporate website, furthermore, personal data collected by our organisation is used only for the stated and explicitly listed purposes under our Data Privacy Policy.

Why do we collect data?

Emirates NBD is committed to collect used data through lawful and transparent means, furthermore, where required, we will ask for the explicit consent of the data subject. We collect data to facilitate your relationship with us and provide the requested services. If we do not receive the information that we request, we may not be able to provide the requested services.

How do we collect personal data?

We collect data directly from you as our customer or prospective customer. Our agents, affiliates, subsidiaries, and service providers collect personal data in several ways, which include via services or when for example you meet us ahead of transactions, public databases etc.

Who do we share your personal data with?

We might share your personal data with companies within the Emirates NBD Group who may support us in any of the purposes set out in our Data Privacy Policy; and with other third parties based on the explicit consent provided by the data subject; or to comply with regulatory requirements. The disclosure of personal data to these parties is done with the utmost care and due diligence to ensure that the protection and privacy of your data is maintained. We require third parties to ensure compliance with the content of our Data Privacy Policy.

How do we protect your data?

We use a range of measures to keep your personal data secure and protected against unlawful processing, accidental loss, destruction, and damage. When we use external service providers, we require them to provide the same standards of data protection as we do, and we are committed to respect human rights in our data management processes. Our Group Information Security Strategy has been developed to further strengthen Emirates NBD Group's commitment towards the protection of data while our Information Security Strategy is aligned amongst others with industry security safeguards and NIST Framework as well as ISF Standard for good practices for Information Security. No breaches have happened at Emirates NBD Group in the past at least five years.

Your Right?

In certain circumstances, you have the right to:

- ask for a copy of the personal data we hold about you,
- ask us to correct personal data we hold,
- ask us to delete your personal data,
- withdraw consent to the processing of your personal data by us except where your personal data is required for business operation in relation to the product or service you obtain from us; and sharing your personal data with third parties for purposes such as but not limited to marketing or sales.

4.3. Anti-Bribery and Anti-Corruption Statement

The Emirates NBD Group (“the Group”; “the bank”) is committed to ethical business practices and, to compliance at all times with applicable Anti-Bribery and Corruption laws (hereinafter collectively known as “ABC laws”) across all countries where the Group carries on business. The Group believes that long-term, successful business relationships are built on honesty, fairness and the strength of the Group’s products and services, and not on unethical business practices. The ABC Policy provides clear rules for the Group employees and associated third parties engaged in the Group’s business activities, to ensure compliance with the ABC laws; and the Group’s ethical standards and expectations.

The Group operates and enforces a zero-tolerance approach towards Bribery and Corruption in any form and will carry out appropriate due diligence on its employees and associated third parties to minimise the risk of being associated with acts of Bribery or Corruption. Furthermore, the bribery and corruption risks will be monitored and managed effectively in order to maintain a strong control system.

All Group employees and associated third parties are prohibited from:

- Offering, suggesting, or paying a bribe ¹or authorising the offering, suggestion, or the payment of a bribe;
- Soliciting/Accepting a bribe to influence a decision, to obtain unauthorised access to confidential information, to commit or omit to do an act, whether or not the outcome would have been the same without the bribe;
- Making facilitation payments². This includes facilitating such payments on behalf of customer.
- Using another party (i.e., intermediaries or agents) or acting as intermediaries to conduct any of the above;
- Using third-party service providers who are identified to have poor standards on Bribery and Corruption management;
- Processing funds known to be, or reasonably suspected of being the proceeds of bribery or corruption³.

As per the ABC Policy:

- All employees have an obligation to report suspected violations of ABC laws or other associated irregularities.
- Employee(s) involved in an investigation of violations of ABC laws or other associated irregularities maintain all rights afforded through the applicable bank policies and processes.
- Any investigation for bribery and corruption allegations will be conducted without regard to any person’s relationship with the Group, position, or length of service.
- These will be independently investigated internally by the Group Fraud Prevention & Investigations (“FP&I”) unit.
- Mandatory trainings and acknowledgement of the company’s policies on bribery, corruption and facilitation payments are imposed to all employees of the Group, annually.
- No Group employee or associated third-party will suffer adverse consequences for refusing to engage in improper payment activity, even if this results in loss of business.

Any breach of this Policy by employee(s) or associated third-party(s) may result in disciplinary action by the Group, including termination of employment or service arrangement(s), and may include criminal or regulatory proceedings against the individual(s).

Our position towards gifts

A gift is an item for which financial payment is not required and is usually given by business contacts or customers as a token of appreciation or as a means of expressing normal business courtesies. This applies to all gifts including but not

¹ Bribery Definition: defined as the offering, promising, giving, accepting, or soliciting of an inducement, advantage, or reward to gain any contractual, commercial, regulatory, or personal advantage or which is otherwise illegal, unethical or constitutes a breach of trust.

² Facilitation Payments Definition: are typically small unofficial payments paid to speed up an administrative process or secure a routine government action by a public official. This need not be monetary in nature; it can be of any value, and include goods, services, and information.

³ Corruption definition: the misuse of position, authority, power, or entrusted power for private gain. It generally refers to the state or situation resulting from the offering, promising, giving, soliciting, or authorising of a bribe.

limited to goods, services, discounts, non-business entertainment, personal travel or lodging, or any other arrangement that may benefit the individual recipient.

Group employees should not give or offer a gift to, or accept a gift from, anyone with whom the Group conducts business wherein such a gift would exceed the customary courtesies associated with accepted general commercial practice. Employees may accept gifts of nominal value only (generally less than AED 1000 or USD 275) where receipt of the gift will not affect the employee's independent judgement in their Group's work. Our employees need to annually acknowledge compliance with the policies governing bribery, corruption, conflict of interests and related aspects.

4.4. Conflict of Interest Statement

Emirates NBD and its related business units, subsidiaries, overseas branches, and representative offices is committed to establishing standards and controls across the Group to protect the Bank, its employees and most importantly its customers. It is with this in mind that Emirates NBD has established a Conflicts of Interest Policy. The purpose of the Policy is to establish all reasonable steps to prevent and minimise the risks of conflict of interest arising or manage an identified Conflict of Interest, whether real or perceived, which may create reputational damage for the Group.

The Group commits to the principle that it will manage all conflicts of interest fairly, that may arise between the Bank and its clients or that may arise between one client and another. Where the Group is unable to manage a conflict of interest fairly, either through a Bank policy or procedure or by way of disclosure of the conflict, then the Bank will decline to act. All employees of the Group are responsible to identify potential conflicts, whether perceived, potential, or actual. Identification is critical to manage the Group's reputational risk and/or regulatory requirements. If a conflict of interest arises, it is the responsibility of all employees to report the conflict to ensure that any conflicts can be managed promptly and fairly.

The Policy includes matters relating to the following:

- Information Barrier Framework
- Identification and Notification
- Recording
- Permanent and Temporary Insiders
- Wall Crossing
- Related Parties and Related Party Transactions
- Outside Interests

In summary and as set out above, the guiding principle of the Bank is to manage an actual Conflict of Interest fairly. We expect our employees to act in the best interest of the Group and its customers, without favouring any external parties. As conflicts can arise in many forms and due to a broad array of activities, please find below a non-exhaustive list of examples, used for demonstrating potential conflicts that the Group might face from time to time:

- Research – using product research material by the Group with market recommendations for own personal use,
- Conduct- Gifts and entertainment– Actions or decisions by an employee in managing gifts and entertainment, personal political activity that may conflict with the interests of a client,
- Insider Trading: Individuals using non-public information gained through their position at the bank for personal financial gain or to benefit others,
- Conflict interest in a transaction -the Group having an interest that is conflicting to a clients' transaction.

Emirates NBD Group ensures the preservation of trust, transparency, and ethical conduct. We are committed to minimise, identify, and properly manage conflict of interests as they arise, maintaining the highest standards of professionalism and integrity.

4.5. Anti-money Laundering Statement

The Emirates NBD Group is committed to the highest standards of Anti-Money Laundering (AML) Compliance, Counter Terrorism Financing (CTF) and Counter Proliferation Financing in accordance with the Wolfsberg Principles.

Our Group Wide policies apply to all staff, this is inclusive of members of the Board, management, advisors, agents, brokers, consultants, contractors, intermediaries, introducers, suppliers, joint venture entities with whom the Group works and all other stakeholders. All are required to adhere to these standards to prevent the use of Group products and services from being abused for money laundering, terrorism, and other illegal purposes. A reputation for integrity in the Group's business behaviour is imperative to the achievement of its commercial goals and to the fulfilment of corporate responsibilities.

The objective of our AML Policy is to:

- Prevent criminals from using the bank and its subsidiaries for money laundering and as a conduit for terrorism financing.
- Implement appropriately tailored AML/ CTF/ Proliferation Financing controls and standards in accordance with the products and services of the bank and its subsidiaries.
- Manage AML/ CTF/ Proliferation Financing controls, risks, and best practice in order to safeguard the bank and its subsidiaries.
- Ensure adherence to the policy is assessed by means of annual audit and regular reviews.
- Provide assurance to the Board of Directors that the bank and its subsidiaries are taking action to mitigate the risk of money laundering and terrorism financing.

The AML Policy implements and provides for:

- A strong governance model with defined responsibilities and accountabilities including the appointment of Group and Country-level Money Laundering Reporting Officers.
- Establishing clear accountabilities, roles, and responsibilities to manage money laundering risk, indicating 'Key AML Roles and Responsibilities', strengthening our commitment to take the appropriate measures to identify clients or beneficial owners of unusual transactions.
- Having a Risk Based Approach to Customer Due Diligence (CDD) during the onboarding of clients/customers and ongoing monitoring the customer activities.
- Reject transactions known or suspected to involve money laundering or terrorism financing. When suspicious transactions are identified by responsible employees, an investigation process is triggered including timely investigation and resolution of alerts, proper escalation and documentation around the decision is gathered. All our employees are responsible for following an agreed escalation route for reviewing suspicions and reporting to the relevant authorities, as covered in the internal Suspicious Transaction Activity Report. We are committed to taking appropriate measures against stakeholders attempting to use our products and services to finance criminal conduct.

The prohibition of the following products, services and customer types apply throughout the Group:

- Shell Companies,
- Numbered Accounts,
- Pay Through Accounts,
- Shell Banks or Unlicensed Banks,
- Anonymous or Fictitious Accounts,

- Gambling (including Spread Betting),
 - Issuers of Bearer Shares,
 - Personal accounts which are being used for business operations or proceeds,
 - Anyone involved in illegal or prohibited activity in accordance with UAE and/or local law,
 - Persons under any relevant sanctions (international, national, other foreign applicable sanctions),
 - Customers that are known to be or are strongly suspected of being involved in money laundering or terrorism financing activities.
- Establishing procedures to ensure that suspicious activity is reported in accordance with requirements prescribed by local laws and regulations and shared, where legally permissible and relevant.
 - Mandatory AML awareness training is to be undertaken by all staff within their first weeks of joining the Group and annually thereafter.
 - Retain appropriate records of CDD, transactions, suspicious activity, and AML training.

In order to assist financial institutions and counterparties on the AML/ CDD requirements of the bank, Emirates NBD utilises the Bankers Almanac and the SWIFT The KYC Registry, which provides information such as the completed the Wolfsberg Correspondent Banking Due Diligence Questionnaire (CBDDQ), constitutional documents and Annual Reports.

4.6. Group Sanctions Statement

The Emirates NBD Group and its subsidiaries (the Group) are committed to compliance with the Economic and Trade Sanctions (herein referred to as sanctions) laws in all jurisdictions in which the group operates including compliance with the United Nations, UAE, U.S, UK & EU sanctions.

Emirates NBD recognises that failure to comply with applicable sanctions laws or to prevent, or manage this risk, would not only constitute a breach of legal and/or regulatory requirements but could carry significant reputational damage, legal and regulatory action, and financial loss for the bank.

The Group Sanctions policy sets out the Group's approach to identifying, mitigating, and managing its sanction compliance risk and provides our employees and contractors with guidance of the Group's risk appetite with regards to sanctions and the Group's compliance duties and responsibilities.

The Sanctions Policy sets out the Group approach and obligations to sanctions compliance and includes:

- The Group complies with the requirements of the UAE sanctions regimes both within the UAE and abroad.
- The Group complies with non-UAE sanction regimes whenever they apply (such as Emirates NBD's international operations) and foregoes any business that would breach these sanctions regimes.
- The Group refrains from engaging in any sanctionable conduct.
- The Group prohibits any evasion of sanctions laws and or obligations.
- The Group prohibits any concealment or intentional omission of information regarding a sanctioned element in transaction messages sent to counterparty banks.
- The Group screens for sanctioned targets in accordance with applicable sanction regimes.
- The Group carries out due diligence on its directors, employees, customers and associated third parties/suppliers/service providers etc. to minimise the risk of dealing with or assisting/ benefiting sanctioned targets.
- Reporting of sanctions breaches/ issues to relevant Regulatory Authorities.
- The Group may decide not to provide products or services even when it is permitted by sanctions regulation.
- Ensure adherence to the policy is assessed by means of audit and regular reviews.

4.7. Political Involvement Statement

Our policy influence is characterised by our pronounced emphasis on social contributions. In a testament to our commitment to the broader community, we channel significant resources toward charitable endeavours, supporting everything from educational initiatives to healthcare projects aimed at uplifting those in need.

In line with our dedication to transparency and ethical operations, Emirates NBD has not made any contributions to political campaigns, nor have we funded organisations lobbying trade associations. We prohibit political involvement of any kind including lobbying and political expenses, in line with the laws and regulations in countries where we operate.

4.8. Insider Trading

Employees must not use information gained during their employment with the Group unless such information is already available to the public domain, for personal or others' gain. This includes, but is not limited to, directly or indirectly dealing, or advising, or arranging for anyone else to deal, in any shares or other securities.

4.9. Anti-Trust and Anti-Competitive Practices

Our Group operates in compliance with rules and regulations within the regions where it operates, we are committed to ensure free competition in the marketplace by prohibiting unfair competition, price fixing and unfair trading practices such as misleading or destructive advertising. All our employees are made aware and acknowledge the competition rules applicable in all areas of work and conduct themselves in accordance with internal and national laws regarding competition compliance. Our Legal department is at the disposal of all our employees in the Group for consultation and advice on sensitive topics.

4.10. Commitment to addressing major business risks

Our Group is committed to identifying and addressing all major business risks and to ensure stringent compliance with laws and regulations applicable in the jurisdictions where we operate. Through robust internal controls we ensure that trust is being built with clients and as such we work towards protecting shareholder value by minimising our legal risks.

4.11. Group Tax Approach

Emirates NBD has a responsible and transparent approach to tax. Emirates NBD is committed to complying with all applicable tax law, tax regulations and reporting requirements in the jurisdictions where we operate.

Compliance with tax obligations and relations with tax authorities is governed by the following main principles of conduct:

- Act transparently and seek a proactive and cooperative relationship with the relevant tax authorities.
- Comply with national and international tax laws and regulations. Primarily, commit to timely and accurate registration filing of tax returns, collection and payments of taxes, appropriate documentation, and tax reporting.
- Interpret tax laws in line with their intention and apply the laws accordingly.
- Pay the Group's appropriate share of taxes in each jurisdiction in accordance with the relevant laws and regulations.
- Practice zero tolerance for any illegal actions on tax. Emirates NBD will cooperate with the authorities in accordance with all applicable rules and regulations if any business partners or customers engage in tax fraud or tax evasion to the knowledge of the Group.
- In line with the Group's core values, there will be no participation in any aggressive tax arrangement.

4.12. Treating Customers Fairly – Responsible Products and Services

Fair treatment of customers is central to the culture of Emirates NBD and all employees must pay due regard to the interests of the bank's customers and treat them fairly. Products and services marketed and offered to customers, are

designed to meet the needs of identified consumer groups, targeting the appropriate type of clients, and preventing over indebtedness.

We implement the appropriate processes and procedures, and we commit to provide customers with clear and comprehensive information about our products and services, educating and raising awareness on their use before, during and after the point of sale. Any advice given to customers must be timely, clear, and accurate and take account of the customers' circumstances. Employees are prohibited from mis-selling or misrepresenting the bank or its products and services. Role-based trainings being provided on an annual basis at a company level, continuous communication and consultation with department heads and managerial roles is highly encouraged and supported.

4.13. Financial Inclusion Statement

We are committed to work towards innovating and expanding the range of financial services available for our identified underserved group, such as people with disabilities, low-income individuals, illiterate people, or elderly individuals, by offering tailor solutions in accordance with the identified customer base needs and Emirates NBD business strategy.

Our Group is continuously focusing on expanding the research and develop a more inclusive finance market in the regions in which we have operations. We are committed to ensuring that vulnerable customers have access to the Bank's services on the same terms as other customers. We ensure that the design of financial products and services, as well as business operations, premises, ATMs and processes, are appropriate and accessible to consumers from a variety of vulnerable groups in line with international standards of public access. All information regarding financial product features, risks, terms, and conditions must be suitable for and comprehensible to vulnerable consumers.

Emirates NBD deploys resources and efforts in increasing community awareness and providing financial literacy training to underserved groups, including but not limited to young individuals, persons with low incomes, as well as immigrants. In addition, our organisation submits an annual summary report detailing our educational and awareness activities for the previous year to the Central Bank of the UAE. Our whistleblower mechanisms are available 24/7 and easily accessible for all our stakeholders through our website and applications, for both consultation on our products and services but also for reporting unfortunate events, while the highest level of responsibility is being assigned for the aforementioned areas.

4.14. Personal Conduct and Behaviour

All employees are expected to conduct their personal and professional behaviour, both within and outside the Bank, in a manner that reflects the Group's high standards and contributes to effective and harmonious work relationship with colleagues and customers.

Abusive Language and/or Actions

In line with providing a safe and harmonious work environment, the Group prohibits the use of profane or abusive language, fighting, deliberately causing injury to another, and any other form of disorderly conduct or malicious disturbance. Employees are expected to refrain from any inappropriate or immoral conduct or behaviour that adversely affects the bank's respect, regard and/or reputation in the community, whether on or off premises and during or outside of working hours.

Unlawful Conduct

Our Group expressly prohibit employees from engaging in unlawful conduct that may represent a threat to the bank or to the safety of any employee or agent of the Group.

- a. The Group does not permit the possession or consumption/use of alcohol, illegal drugs, or weapons of any kind on its property.

- b. Employees must not report to work under the influence of alcohol or illegal drugs nor bring any kind of weapon to work.
- c. Being in the possession of these or consuming them will be treated as a serious offence and will result in strict disciplinary action.
- d. Any employee convicted of a serious crime, including but not limited to, the sale, possession or use of illegal drugs or substances, will be subject to disciplinary action, including termination.

No Smoking

In line with the Group's responsibility to provide a safe and healthy work environment to its employees, the Group has adopted a no smoking policy in respect of all premises of the Bank.

Dress Code

Dress, grooming and personal cleanliness standards of employees contribute to the Group's image projected to the outside world. In this regard, employees are expected to present a clean, modest, neat, and professional appearance during business hours. Employees are required to be dressed in a formal and professional attire that complies with the workplace norms.

4.15. Discrimination and Harassment

Our Group is committed to maintaining a workplace free of all forms of unlawful and unfair discrimination on the grounds of gender, race, nationality, ethnic or national origin, marital status, age, disability and religious beliefs or any other characteristic protected by law and in line with the ratified ILO C111- Discrimination Convention. Our company has a zero-tolerance policy for any type of discrimination. We firmly believe in hiring, developing, and promoting – but not limited to – selection, performance management, compensation, training, placement, transfer, demotion, promotion, disciplinary action, and termination of employees based on their skills, qualifications, and merit.

Thereby, we commit to equal opportunity employment at all our locations. Furthermore, all forms of harassment, intimidation, bullying, sexual harassment of employees are strictly prohibited. This covers also general victimisation, sexual harassment, racial harassment, and disability harassment. Non-compliance will not be tolerated and will result in disciplinary action being taken against the offenders.

4.16. Gender Equality

The Group is dedicated to promoting gender equality across all aspects of our organisation. We believe in creating a workplace where all individuals, regardless of gender have equal opportunities to thrive. This includes equal pay for equal work, equal access to career advancement, training, and leadership roles. We value the contributions of every employee and strive to foster a workplace that champions gender equality in all aspects including compensation. We are committed to foster an inclusive environment by eliminating gender-based barriers and biases. This involves proactive measures and supporting initiatives that promote gender diversity. Furthermore, we strive to create a culture that values and respects gender diversity, ensuring that our programs support all employees in achieving their full potential. We recognize the unique contributions of every individual and aim to create a supportive and empowering environment for everyone.

4.17. Equal Remuneration

In alignment with our commitment to Gender Equality, as outlined in Section 4.16, the Group is dedicated to promoting equal remuneration and ensuring fairness in compensation practices for all employees. The Group believes in providing equal pay for equal work and roles, irrespective of gender, ethnicity, or any other characteristic. To uphold this principle,

we regularly conduct reviews and analyses of our remuneration practices to identify and proactively address any potential pay gaps and disparities, on a timely basis. We strive to create an environment where every employee feels valued and fairly compensated for their contribution.

4.18. Freedom of Association and Collective Bargaining

Collective bargaining and labour association arrangements are not permitted under the UAE law; however, we comply with the rules and regulations governing these aspects in all areas where we have a presence.

4.19. Health, Safety and Environmental Policy

❖ Environmental Policy

The UAE Net Zero 2050 strategy is a national drive to achieve net-zero emissions by 2050 and we are excited about playing a significant role in helping the UAE deliver a successful outcome. Environmental responsibility is one of the focus areas of the Emirates NBD Group's Sustainability Strategy, with the UN Global Compact and the UN Sustainable Development Goals being our guiding principles.

We have also ratified the United Nations Principles for Responsible Investment and we are dedicated to minimising our operations' direct and indirect impact on the environment. We have a track record of upholding environmental regulations, thereby our Group has not faced fines or other forms of non-financial punishment for non-compliance with environmental laws.

Our Environmental Management System is certified with the ISO 14001:2015 and we are making efforts to improve our environmental performance through initiatives such as energy and water conservation, green energy stations, plastic consumption reduction and paper waste management, pressure reduction, and leakage sensor installations.

Therefore, Emirates NBD Group is committed to:

- Environmental protection and sustainability. We recognise the importance of responsible business practices that minimise our impact on the environment, and we strive to integrate environmental considerations into our operations, decision -making process and investment strategies.
- We are committed to and have implemented an Environmental Management System certified to the ISO14001 standards and we have set the ambitious target to continually reducing our environmental impact.
- We will reduce the consumption of natural resources and work towards improving energy efficiency, by implementing a series of initiatives across the group.
- We continually work to reduce our carbon emissions and waste.
- Creating awareness of environmental responsibility among internal and external stakeholders, empowering employees to implement this policy and encouraging suppliers to adopt a similar approach.
- We are committed to consult and engage with internal and external stakeholder on environmental issues.
- Considering our own advancement, scientific and technological advances, societal trends, and the shifting opinions of our stakeholders regarding the urgency of addressing and tackling climate change and environmental issues, we will continuously monitor and review our environment performance and tighten our approach. Additionally, we pledge to report our findings both internally and externally and to take the proper corrective measures as needed.

❖ Health, Safety and Human Rights Policy

At Emirates NBD we recognise the utmost importance of safeguarding the health, safety and well-being of our employees, customers, and visitors. We comply with the standards and best practices for occupational health and safety management, in line with all relevant local regulations, Civil Defence guidelines, the UAE Emergency, Safety and Life Code and applicable international guidelines.

Respect for human rights is a fundamental value for Emirates NBD Group in all our relationships with employees, suppliers, and other parties. We are committed to protect, respect, and promote human rights principles encompassed by the Universal Declaration of Human Rights, including those contained by the International Labor Organisation's

conventions ratified within UAE. To strengthen our commitment, we are also a signatory to the United Nations Global Compact. We acknowledge that financial institutions, like any other enterprises, may be related to practices that harm human rights by creating an adverse impact, contributing to an adverse impact or by having business relations with third parties which are directly linked with an adverse impact. Thereby, we aim identify and prevent human rights risks within our organisation and value chain. Where adverse human rights impacts are identified, we are committed to providing for or cooperating in their fair and equitable remediation.

We have a strong commitment across the Group towards preventing:

- Human trafficking
- Forced Labor
- Child Labor
- Discrimination

We ensure compliance with all applicable laws with respect to freedom of association and collective bargaining, including those applicable in the UAE. We remain committed to respecting the rights of our employees and fostering open communication and dialogue to address workplace concerns.

As a responsible financial institution, we are committed to maintaining a culture of safety and compliance throughout all our operations, ensuring that:

- We provide a safe working environment to all staff, customers and third parties under Emirates NBD jurisdiction and to create an environment and a culture that supports health, safety, and well-being. Our comprehensive annual health and safety training programs, equip our staff with the necessary knowledge and skills to maintain a safe workplace.
- We adhere to all relevant health and safety laws, regulations, and industry standards. Our health and safety management system are continuously monitored and reviewed to reduce the risks and hazards exposure as well as, reducing the number of accidents and injuries recorded.
- Preparedness is a cornerstone in effectively responding to emergencies. Therefore, we have established a comprehensive emergency response plan to address various scenarios. Regular drills and simulations help our employees stay prepared for any unforeseen events.
- We prioritise the health and well-being of our employees by offering wellness programs that promote physical and mental health.
- Our Group Safety Committee is responsible for overseeing HSE activities, including continuous monitoring and reviewing of health, safety and environmental risks, issues and gaps, actions taken and required, incidents reported, and enhancements needed. The committee is also responsible for consulting with employees on HSE matters and ensure that the emergency management process is clearly defined, tested, and reviewed.

The Emirates NBD Environmental, Health and Safety Policy commitments covers business activities and operations throughout the group and applies to all business units and entities.

4.20. Supplier Minimum Standards

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, organisation to which Emirates NBD is a signatory, covering the areas of human rights, labour, 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 must:

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.

Labor 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.

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.

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.

Emirates NBD Group requires the suppliers to adhere to all applicable laws and regulations and for the pillars detailed hereunder. In addition, Emirates NBD reserves the right to verify compliance with the Code through internal or external assessment mechanisms. 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 authorised 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. 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. Suppliers must, under no circumstances, engage in, or support any form of forced, bonded, indentured, or involuntary labour. Usually characterised 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 strictly prohibited, in line with International Labor Organisation (ILO) Convention 138 on the Minimum Age, and Convention 182 on the Elimination of the Worst Forms of Child Labor. 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.
- 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 conditions, including easy and unrestricted access to hygiene facilities. Suppliers must uphold a health and safety management system aimed at minimising 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.
- 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 shall document and implement controls and mitigate significant environmental impacts as applicable. The Supplier shall 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 shall optimise its consumption of natural resources, including energy and water. Supplier shall implement and demonstrate sound measures to prevent pollution and minimise generation of solid waste, wastewater, and air emissions. Prior to discharge or disposal, supplier shall characterise and treat wastewater and solid waste appropriately, according to applicable laws and regulations. Furthermore, we are taking into consideration sustainability considerations and criteria in our procurement practices addressing both processes and products. We are committed to use office products incorporating sustainability requirements and we engage with our suppliers on this topic.

The supplier or its employees can report any suspected violation of regulations, laws, and the content of this code of conduct directly to Emirates NBD Group, using our whistleblower mechanisms. The Supplier Code of Conduct is publicly available on our corporate website at www.emiratesnbd.com.

4.21. Suspicious Incidents - Whistleblower Policy

Emirates NBD Group is committed to the highest standards of openness, integrity, and accountability in the delivery of its services. Whilst our organisation has instituted a wide range of rules, regulations, procedures, and codes of practice to deliver on its commitments, fraud, malpractice, abuse and/or wrongdoings might occur within our operations or supply chains. As such, we have a whistleblower policy to empower stakeholders the opportunity to report in good faith, suspected fraud, waste and abuse, corruption practices or any breaches of this document.

Anybody who wishes to raise a Whistleblowing concern can report to a dedicated mailbox managed by the Group for this purpose at ethicsline@emiratesnbd.com.

Regardless of the channel, the reporting may be anonymous or the individual providing the report may choose to provide a name and contact details, reports being treated with utmost confidentiality. We are committed to prevent any retaliation on whistleblowers. All reports must be made in good faith and not to be used to harass, prejudice or intimidate fellow colleague. Additionally, reports may be made in the local languages where we have our operations.

The identity of the whistleblower will be kept confidential if the case requires. Not disclosing the details, however, can restrict bank's ability to investigate, ask follow-up questions, and provide feedback. Disciplinary action will be taken against anyone deliberately raising false and malicious reports.

What should Whistleblowers report?

- Any dishonest or fraudulent conduct, violation of the company's policies and ethics standards;
- Misappropriation/ misapplication of funds, securities, supplies or other assets;
- Impropriety in the handling or reporting of money or financial transaction;
- Profiteering as a result of insider knowledge of bank activities;
- Disclosing confidential and proprietary information to outside parties;
- Disclosing to other persons securities activities engaged in or contemplated by the bank;
- Accepting or seeking anything of material value from contractors, customers, vendors, or persons providing services/material to the bank;
- Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment
- Any similar or related irregularity.

How is whistleblowing different from a normal complaint or enquiries?

Whistleblowing relates to any perceived misconduct or unethical activity that is performed by an individual that adversely impacts the bank. Complaints related to service issues or related customer service matters and enquiries relate to general information or asking about a particular product offered by the Group does not constitute whistleblowing. Complaints and general enquiries should be reported through the appropriate channels on the bank's website: www.emiratesnbd.com.

How the matter will be handled?

When submitting a report, the whistleblower should provide as much detail as possible, including the name of the person involved, the specific nature of the acts or their suspicions. Dates and times of the acts and the names of other parties involved should also be provided.

Once the report is received, the event will be investigated fairly, objectively and in a timely manner. At no time will individuals involved in the investigation have a vested interest in the outcome. Our Head of Fraud Prevention and Investigation will assign the case for investigation to a competent member under his supervision, member who will ensure that all reports are filled, and evidence is maintained under secure and confidential conditions. As part of the resolution the appropriate internal stakeholders will collaborate in implementing corrective actions and take measures against the party responsible for violation our policies, rules, and regulations in line with internal procedures and with the law governing these aspects within the operating area.

Our stakeholders are encouraged to raise concerns in confidence regarding unethical activities, misconduct, malpractice, breaches of law, regulations, banks standards, fraud or other criminal acts and similar serious incidents which may pose a threat to the Group's reputation and/or interests or for any other matters highlighted in our Whistleblower Policy. We disclose the number of reports received, types of misconduct and measures taken throughout our annual reports available on our website. Whistleblower reports can be made in the in local languages used in the locations where Emirates NBD or its subsidiaries have operations.

In addition, all our employees undergo an annual training and sign off the Whistleblower Policies and Code of Ethics.

5. RELEVANT POLICIES

- Code of Conduct
- Supplier Code of Conduct
- Data Privacy Policy
- Anti-bribery and anti-corruption Policy
- Conflict of Interest Policy
- Anti-money Laundering Policy
- Financial Inclusion Policy
- Customer Education and Awareness Policy
- Health, Safety and Environment Policy



❖ Policy Sign Off Sheet

Policy Name	Group Policy Repository
Effective Date	August 2023
Update Date	July 2024