Emirates NBD Group

Net Zero Transition Plan 2025

بنك الإمارات دبي الوطني
Emirates NBD

Table of contents

1. Our Foundational Values

1.1 About Emirates NBD Group

As a leading financial institution in the MENAT ("Middle East, North Africa, and Türkiye") region, Emirates NBD Bank (P.J.S.C.) ("Emirates NBD" or "Bank") and its subsidiaries (together the "Group") recognise its responsibility and opportunity to drive meaningful change. The Group has operations in the UAE, Egypt, India, Türkiye, the Kingdom of Saudi Arabia, Singapore, the United Kingdom, Austria, Germany, Russia and Bahrain and representative offices in China and Indonesia. The Group employs more than 30,000 employees, representing more than 90 nationalities, making it one of the largest and most culturally diversified employers in the UAE. Emirates NBD is listed on the Dubai Financial Market (DFM).

The Group serves its customers (individuals, businesses, governments, and institutions) and facilitates their financial objectives through a range of banking products and services. A record profit before tax of AED 27.1 billion was reported with an income of AED 44.1 billion for finance year 2024, driven by a substantial increase in financing/lending, a stable low-cost funding base and healthy recoveries. The outstanding financial results and elevated customer experience were achieved through the strategic investments in technology and people, setting a robust foundation for the future.

1.2 Sustainability at the Group

The Group continuously aligns our strategy with the UAE Net Zero 2050 initiative, as well as with the UN SDGs, UAE Vision 2030, and the Dubai Declaration for Sustainable Finance . The Group further strengthened its sustainability commitments through the establishment of a Sustainable Finance Framework (SFF) and a Sustainability-Linked Loan and Bond (SLLB) Framework, as well as by signing the United Nations Principles for Responsible Banking ("PRB") in 2024, aligning our banking strategies with the Paris Agreement and the UN SDGs. The Group released the first Group 2024 IFRS S1 and S2 Report ("ISSB Report") in 2025 along with third-party assurance of our financed emissions, reflecting the Group's ongoing evolution in sustainability reporting.

The Group recognises that financial sector plays a pivotal role in enabling transition to net zero by mobilising capital, supporting industry-wide decarbonisation, and integrating climate risk into investment and financing/lending decisions. We continue to lead the way in sustainable finance, supporting the UAE Banking Federation's ambition to mobilise AED 1 trillion in sustainable finance by 2030, and through setting our own target of USD 30 billion by 2030. We are introducing innovative products and services. For example, we launched the UAE's first ESG-linked working capital finance/loan in the private sector, and in August 2024, we introduced the Emirates NBD Sustainable Fixed Deposit for retail customers. These initiatives demonstrate our ability to innovate while aligning with critical environmental and social goals. Further to this, Emirates NBD pioneered the market by issuing the world's first Sustainability-Linked Financing Bond (SLLB) under the ICMA / LMA framework, and the world's first Sustainability-Linked Financing Sukuk (SL Sukuk) via Emirates Islamic.

1.3 About Group Net Zero Transition Plan (NZTP)

The Group Net Zero Transition Plan (NZTP) sets out the Group's ambition to align with UAE Net Zero 2050 strategy while addressing climate change across its operations and value chain. This inaugural document includes data for the year ended 31 December 2024 and first half ("H1") of 2025 which comprises of the ESG related disclosures for the Group and all its subsidiaries. The NZTP should be read in conjunction with the Group's other annual sustainability disclosures for a full view of our performance.

The NZTP has been developed considering guidance provided by the Transition Plan Taskforce (TPT).

The TPT Framework is designed to be consistent with, and build on, the final Climate-Related Disclosures standard (IFRS S2) issued by the International Sustainability Standards Board (ISSB). It provides a set of disclosure recommendations that an entity can use as guidance on how to report more effectively on the transition plan-related aspects of IFRS S2. The Group 2024 "ISSB Report" was published in January 2025 and this document expands on the disclosures of the ISSB report and other sustainability disclosures which are available on the corporate website.

This NZTP framework includes the following:

Governance Framework
The governance structure highlighting the board and executive level committeesthat contribute to the Group's net zero transition plan decision-making process.

Net Zero Ambition
To outline the strategy and approach to the Groups 'transition plans. This will encompass the entire value chain including upstream, midstream/operations and downstream and provide insight on sectoral decarbonisation plans.

Metrics and Targets
Scope 1 and Scope 2 (operational emissions) target and progress towards these targets, Information on Carbon Credits, Financial Metrics and Targets to provide details on investments in transition finance. Scope 3, category 15 (financed emissions) details shall be published separately on the corporate website along with assurance.

The Group is committed to supporting clients in their transition, aligning financing activities with low-carbon pathways, and embedding climate risk considerations into governance and risk management frameworks. Acknowledging that different industries face unique challenges in decarbonisation, this plan also introduces a phased approach to developing sector-specific transition pathways, ensuring that high-emitting sectors receive tailored financial support to transition responsibly.

Our ambition towards reaching net zero is not only driven by regulatory compliance but also by our broader duty to support long-term financial resilience, sustainable economic growth, and value creation for our customers and stakeholders. By integrating sustainabilit into our financial products, financing/lending practices, and investment strategies, the Group is committed to enabling a just, inclusive, and economically viable transition. This plan is a starting point and will be refreshed annually to align with evolving regulations, technologies, and market conditions, ensuring that the Group remains at the forefront of climate leadership and sustainable finance in the region and beyond.

NZTP Framework

Governance Framework | Net Zero Ambition | Metrics and Targets

[1] Compliance with relevant regulations in the regions and countries of operation is prioritised.

2. Overview of Net Zero

2.1 Global Emissions Profile

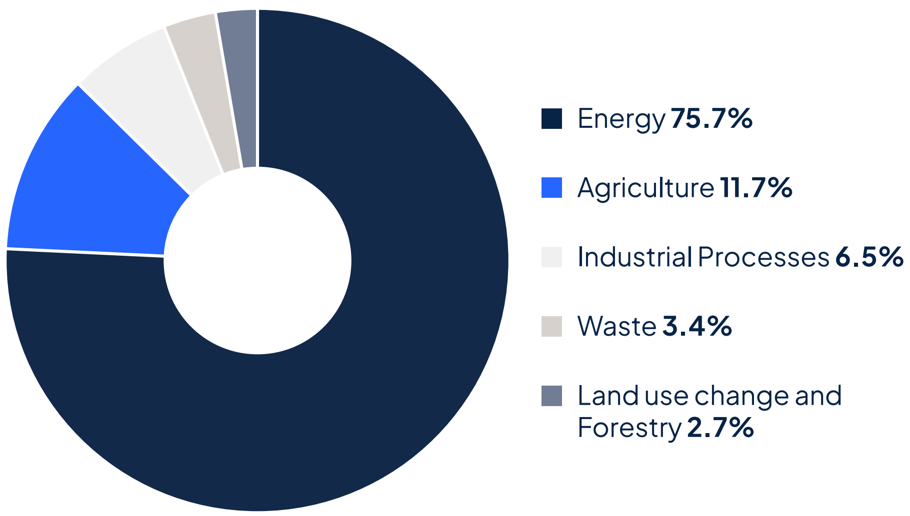
Limiting global warming to 1.5°C above pre-industrial levels, as set out in the Paris Agreement, requires a rapid and sustained reduction in greenhouse gas (GHG) emissions. According to the Intergovernmental Panel on Climate Change, global emissions must decline by around 43% from 2019 levels by 2030, and reach net zero by around 2050, to have a reasonable chance of meeting this goal. Current national commitments, while improving, remain insufficient to close the gap to a 1.5°C-aligned pathway, placing greater emphasis on urgent action by governments, businesses, and the financial sector.

The distribution of emissions is highly uneven. A small number of countries and sectors account for the majority of global GHG output, with fossil fuel use for electricity, heat, and transport remaining the largest contributors. Heavy industries such as steel, cement, and chemicals, as well as agriculture and land-use change, are also significant sources. Many of these high-emitting sectors are core to economic development and require complex transitions involving technology deployment, supply chain transformation, and new business models.

The Global GHG emissions can be linked to five major sectors as they account for majority of global emissions and can be critical for implementing reduction strategies to achieve Net Zero. As at 2021, 76 percent of GHG emissions came from energy sector which includes emissions from electricity and heat, transportation, manufacturing and construction, and buildings. The energy sector also includes fugitive emissions (greenhouse gases released during fossil fuel production or transmission) and emissions from other fuel combustion. A further 12 per cent of global GHG emissions are from agriculture, and the remaining emissions are directly from industrial processes (6%), land-use change and forestry (3%) and waste (3%).

Figure 1

Global GHG Emissions by sector (CO_2e)



[2]Climate Watch, GHG Emissions, 2021 dataset

Overview of Net Zero

For financial institutions, global emissions trends translate into both transition and physical risk considerations. Decarbonisation pathways differ widely between regions, shaped by factors such as energy mix, policy ambition, technology readiness, and access to finance. Emerging markets, including those where the Group operates, may face steeper challenges due to infrastructure constraints and the need to balance development goals with emissions reduction. At the same time, these markets hold significant opportunities for investment in clean energy, sustainable infrastructure, and climate adaptation.

Achieving global emissions reductions on the scale required will depend on the rapid scale-up of proven low-carbon solutions, accelerated innovation in hard-to-abate sectors, and the widespread adoption of nature-based and carbon removal solutions. For energy sector which has the highest contribution to global emissions, the key to decarbonisation will be deployment of clean energy, largely renewables, to reduce the demand for fossil fuels in industry, buildings, and transport. Financial institutions have a critical role to play in mobilising capital towards these objectives, enabling clients and counterparties to transition in line with credible, science-based pathways. The Group recognises that a science-based approach for transition plan requires building a roadmap to shift to low-carbon and sustainable economy for reducing GHG emissions through its financing/lending activities.

The NZTP is designed with this global context in mind. While the sectoral pathways are specific to the Group portfolio and countries of operation, they are calibrated against internationally recognised benchmarks and transition scenarios. This ensures that our approach contributes to the collective global effort to reduce emissions, while reflecting the realities and opportunities within the markets we serve.

3. Governance Framework

3.1 Introduction

Effective governance plays a critical role in ensuring that the Group's net zero transition is credible, science-aligned, and integrated across the organisation. The Group recognises that transitioning to a low-carbon economy involves not only setting ambitious goals, but also embedding climate-related considerations into strategic planning, financial decision-making, and operational execution.

The Group has established a structured governance model that clarifies roles, enables Board and executive-level oversight, and strengthens internal accountability. Governance mechanisms are also designed to be adaptive, supporting the ability to manage trade-offs, respond to regulatory developments, and deliver long-term value. The governance structure spans Board-level leadership and monitoring, executive accountability, policy and risk oversight, and capability development.

This section outlines the governance architecture supporting the Group's transition. In line with the Transition Plan Taskforce (TPT) Disclosure Framework, the content has been structured around the following five key themes:

Board Oversight and Reporting- Outlining the governance arrangements at Board level, including the processes through which the Board provides oversight, reviews progress, and ensures alignment of the transition plan with overall business strategy, regulatory developments, and stakeholder priorities.

Management Roles, Responsibilities and Accountability- Describing the allocation of roles and responsibilities across senior management, including the internal structures, reporting lines, and coordination mechanisms that support effective implementation and oversight of the transition plan.

Culture- Examining how the organisation is fostering a climate-aware and purpose-driven culture, including leadership tone, internal communications, behavioural expectations, and mechanisms to embed sustainability into day-to-day decisions.

Performance Management- Incorporating ESG-related metrics in performance frameworks to align with the Group's ESG Strategy and to cascade and reinforce ownership and accountability across leadership and key functions.

Incentives and Remuneration- Presenting the integration of climate- and ESG-related performance measures into remuneration frameworks to reinforce ownership and accountability for transition delivery across leadership and key functions.

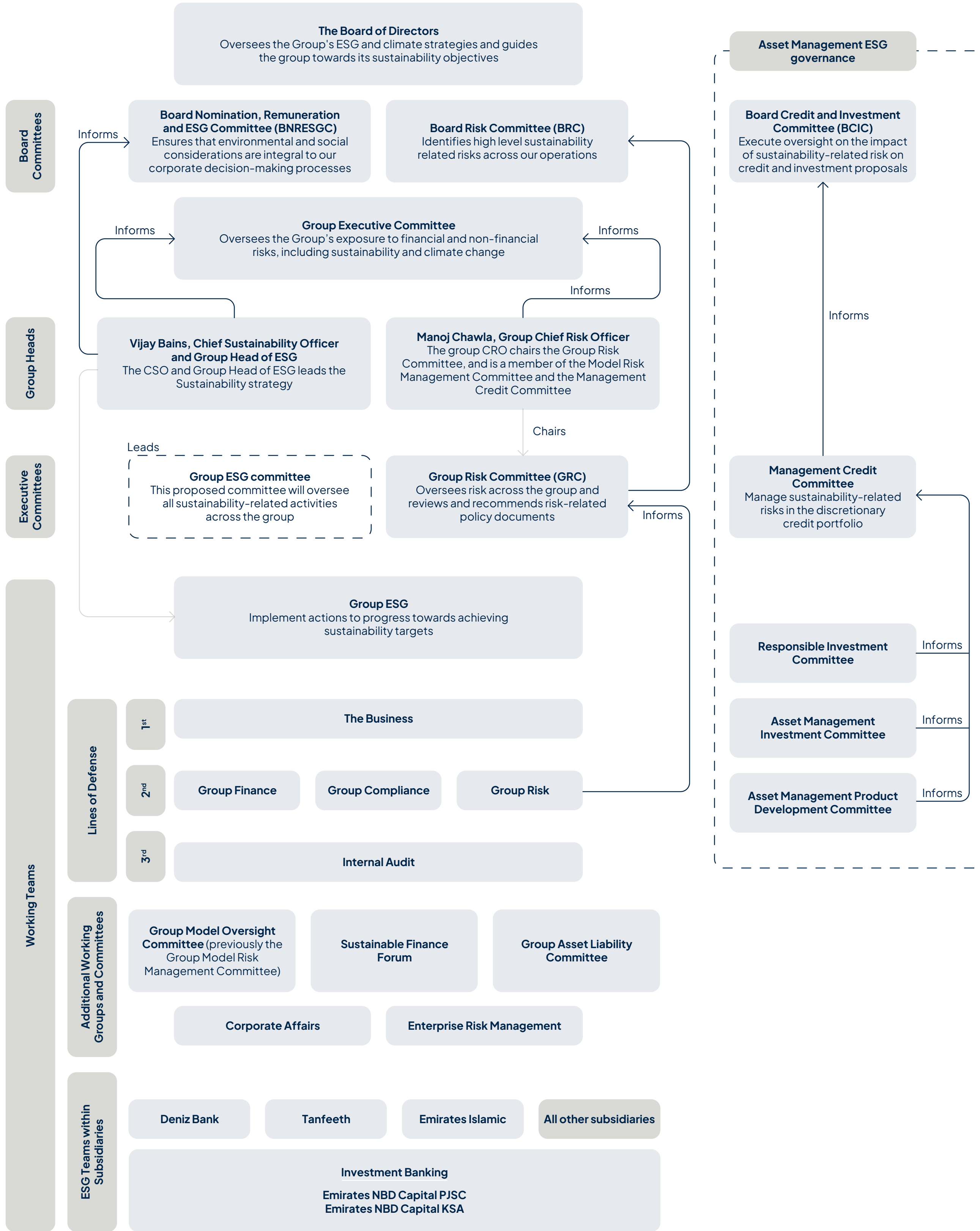
Skills, Competencies and Training- Outlining the initiatives in place to build, embed and sustain ESG capabilities across all levels of the bank. The Learning and Development team, in collaboration with ESG Management, has established a comprehensive ESG Learning Framework designed to enhance climate literacy, integrate ESG principles into day-to-day decision-making, and equip employees to support credible transition execution. The framework includes:

- A core ESG and climate literacy curriculum for all employees.
- Intermediate and advanced, role-based ESG programmes across key areas (Relationship Managers, Corporate Banking, Risk & Compliance, and Investment teams).
- Specialised ESG certification pathways.
- Annual ESG capability audits and learning reviews to identify skill gaps and prioritise interventions.
- Tracking of training completion to ensure 100% ESG awareness and engagement across the organisation.

Figure 2

Sustainability Governance Structure

The Governance of ESG within the Group is outlined as per the below image:



3.2 Board Oversight & Reporting

The Board of Directors at the Group retains ultimate accountability for the Group's net zero strategy, and oversight of its transition planning and delivery. The Board delegates climate-related responsibilities across two core committees: the Board Nomination, Remunerations and ESG Committee (BNRESGC) and the Board Risk Committee (BRC). These committees are supported by executive management, internal sustainability experts, and formal reporting from the Chief Sustainability Officer & Group Head of ESG (GCSO) and the Group Chief Risk Officer (GCRO).

Board-Level Climate Governance
At Group-level, the Board provides strategic guidance on the transition plan, ensuring it is aligned with broader business objectives, financial strategy, and regulatory obligations. It is responsible for overseeing the Group's response to climate-related risks and opportunities and ensuring that internal governance arrangements are robust and evolving in line with international standards.

Through its delegate committees, the Board monitors delivery progress through quarterly updates. Reviews interim targets and milestone achievements, and validates key disclosures including the Annual ESG Report, IFRS S1 and S2 Report and other key filings. It also approves policy developments, and reviews integration of climate-related risks into the Group Risk Management framework.

BNRESGC Responsibilities
The BNRESGC has primary responsibility for climate and sustainability governance. Key responsibilities include:

- Oversight of the Group's overall ESG strategy, including net zero and climate transition planning.
- Advise on integration of ESG considerations into the Bank's strategy, risk management, and decision-making processes.
- Review and approval of any ESG policies, procedures, and frameworks.
- Oversight of sustainability reporting and disclosure alignment.
- Monitoring of progress against sustainability KPIs and targets including emissions reduction targets and sustainable finance commitments.
- Ensure ESG considerations are integrated into executive remuneration frameworks, including approval of ESG-linked KPIs.
- Oversight of implementation and progress of ESG initiatives and programs across the Bank.
- Review and assess banks ESG performance and the banks progress in achieving the goals set under the Group Net Zero Transition Pathway.
- Oversight of sustainable and transition finance frameworks.

BNRESGC receives regular reporting from the GCSO on progress and emerging developments.

BRC Responsibilities
The Board Risk Committee is responsible for the oversight and management of ESG risks. Its mandate includes:

- Approving critical sustainability policies and frameworks, including the Group's Environmental and Social Risk Framework (ESR), and Climate Risk Policy.
- Oversight of transition and physical climate risks within the Group Risk Management framework, as well as the Groups Risk Appetite.
- Authorising the methodology for Environmental and Social (ES) risk scorecard and assesses key climate risk elements, such as risk appetite, evaluation procedures and stress test results.
- Endorsement of sector-specific risk thresholds polices, and exclusions for high-emitting industries.
- Oversight of the Internal Capital Adequacy Assessment Process (ICAAP) and stress testing processes.
- Monitoring alignment of the Group's climate risk practices with supervisory guidance and regulatory frameworks issued by the CBUAE and other regional / international regulators.
- Reviewing integration of climate risks into client and portfolio level risk assessment tools.

This oversight structure enables the committees to exercise informed judgement and ensure that Emirates NBD's net zero strategy is governed consistently across geographies and business lines. It also enhances confidence in the robustness and transparency of the Group's transition planning process among regulators, investors, and stakeholders.

3.3 Management Roles, Responsibilities and Accountability

To support the Board's direction and ensure operational execution, Emirates NBD has implemented a clear and structured management governance framework. The Groups transition plan is governed through a structured and accountable management system, designed to ensure the effective implementation of climate-related strategy across the organisation. Executive ownership, supported by cross-functional coordination and operational delivery mechanisms, ensure that transition planning is deeply embedded into the Groups decision-making, risk management and performance monitoring structures.

Responsibility for delivering the transition strategy sits with senior management, with formal reporting to the BNRESGC and BRC via the Group Executive Committee (EXCO). This ensures that transition matters are escalated through a clear governance hierarchy, enabling appropriate oversight and strategic alignment.

Executive Leadership and Accountability
The Group Chief Executive Officer (GCEO) holds ultimate executive accountability for the delivery of the transition plan. The GCEO provides strategic direction to ensure that climate and sustainability considerations are integrated into the Group's long-term business objectives and financial planning.
The EXCO, chaired by the GCEO, is the principal executive body responsible for monitoring implementation of the transition plan. It reviews progress against financed emissions targets, sustainable finance commitments, and regulatory developments. EXCO is also responsible for reviewing cross-functional risks and opportunities related to the transition and ensuring business unit alignment with Group-level goals. This includes oversight of the Group's contribution to and alignment with the UAE's Nationally Determined Contributions (NDCs) and national net zero ambitions.
EXCO plays a key role in strategic coordination, escalation, and decision-making on transition-related issues. Climate and sustainability updates, including progress towards financed emissions targets, regulatory developments, and sectoral decarbonisation strategies, are reviewed, and approved by EXCO before being elevated to Board Committees.

Role of the GCSO and Group ESG Department
The GCSO, reporting directly to the GCEO, is the executive lead for the Group's sustainability and transition agenda. The GCSO is responsible for:

- Driving the execution of the transition plan and sectoral alignment strategies.
- Ensuring integration of climate-related goals across business units and control functions.
- Overseeing the preparation of Group-level ESG and climate disclosures.
- Leading stakeholder engagement with regulators, peer institutions, and external initiatives with regards to ESG.
- Supporting internal readiness to meet evolving regulatory and disclosure requirements, both in the UAE and across the countries of operation
- Performing annual transition risk assessments at client, portfolio, and sector levels to inform strategic decision-making and risk mitigation.
- Supporting with the physical climate risk assessment across the Group's portfolio.
- Engaging with business units to ensure climate risks are appropriately considered in client onboarding, risk assessments and product structuring.
- Providing technical guidance and tools to embed ESG and climate considerations across governance, risk management, strategy, and performance measurement.
- Supporting development of internal methodologies, taxonomies, and dashboards to monitor climate-related performance, emission targets and sectoral decarbonisation.

The GCSO leads Group ESG, which coordinates across the organisation and wider Group to ensure consistent implementation and integration of climate-related initiatives. Group ESG supports business units in aligning their activities with Emirates NBD's transition plan, the UAE's NDCs and applicable climate / ESG regulation across the respective countries of operation.

Role of additional working groups and committees

- **The Group Model Oversight Committee:** Are responsible for reviewing and approving the climate risk stress testing methodology, its assumptions (such as balance sheet assumptions, stress testing horizon), changes in the used macroeconomic variables and transmission channels for the impact of expected credit loss. The Group MOC is responsible for reviewing and approving the ES risk scorecard.
- **The Group Asset Liability Committee:** Is responsible for review and approval of policies and methodologies related to market and liquidity risks emanating from sustainability and climate-related risks. These risks are evolving concepts compared to credit risk and therefore are not part of the current Climate Risk Policy (CRP) implementation but will be incorporated in the future in line with the evolving regulatory landscape and peer-group industry practice.
- **The Sustainable Finance Forum:** Governs and implements the initiatives set out in the Group's Sustainable Finance Framework. The Sustainable Finance Forum is chaired by the GCSO.
- **Enterprise Risk Management:** Enterprise Risk Management (ERM) within Group Risk formulates the ESR, the Climate Risk Policy, as well as other sustainability-related standards and aids in the implementation of these frameworks throughout the Group through the development and dissemination of methodologies and tools. ERM develops and recommends assessment methodologies, metrics, targets, and tolerances associated with the Group's climate risk appetite. They monitor compliance against risk appetite thresholds. ERM owns the methodologies and calculations to determine financed emissions, as well as stress testing for both transition and physical climate risks. They are responsible for maintaining adherence to evolving regulations and practices concerning risk, including developing and revising the ES risk assessment models and conducting climate risk stress testing in line with CBUAE guidelines. They provide inputs for internal and external communications on ES Risk activities and processes and support the first line of defence in understanding and assessing climate risks in the form of updates to regulations, internal policies, market development and global practices.

Integration of Climate Risk through Group Risk
Group Risk is responsible for integrating climate-related risks into the Group's Risk Management Framework. Climate risk, including both transition and physical risk, is assessed through credit, market, enterprise, and operational risk processes, and aligned with sectoral priorities and regulatory expectations.

The Group's climate risk integration involves detailed reviews of transition-sensitive sectors, scenario analysis and stress testing, and the application of climate-adjusted models. These outputs are used to shape internal risk appetite, inform business unit planning, and escalate material exposures to EXCO and the Board Risk Committee.

Business Line and Subsidiary Implementation
Ownership of transition implementation sits within each business line and subsidiary. While Group ESG provides overall coordination and guidance, business units are responsible for:

- Embedding climate and sustainability objectives into business planning and credit decision-making (in coordination with Management and Risk)
- Aligning client strategies and financing/lending practices with sectoral decarbonisation pathways.
- Contributing to the reduction of financed emissions in line with the Group's net zero targets and the UAE's NDCs.
- Supporting the origination of sustainable finance solutions and green products.
- Facilitating and supporting the development of tracking and reporting climate-related performance and risks at the portfolio level, enabled by Risk and Analytics teams.

Subsidiaries may identify specific sectors as per local regulation or trends, however, mapping shall be provided in their transition plans to show the alignment of their chosen sectors to that at a Group level.

Subsidiaries adhere to consistent governance expectations, including local considerations especially where more stringent, with designated ESG leads working with Group ESG to ensure alignment of local activities with Group-level transition targets.

Overall, management accountability is reinforced through clear reporting lines, operational integration, and structured monitoring processes. Senior leaders are expected to balance growth and transition objectives, assess short- and long-term risks, and support client journeys toward lower-carbon business models. This structure ensures strong ownership of the transition across all major functions and geographies.

3.4 Culture

A credible and sustained transition to net zero requires not only robust strategy and governance but also a supportive and engaged organisational culture. At Emirates NBD, fostering a climate-conscious and purpose-driven culture is a foundational enabler of the Group's transition efforts, ensuring that employees at all levels understand the relevance of climate-related risks and opportunities, and are empowered to act in alignment with the Group's long-term sustainability vision.
The Group's approach to culture is guided by the belief that climate and sustainability ambitions must be underpinned by shared values, behaviours, and decision-making norms. This requires not only awareness and training but also clear tone-from-the-top, visible leadership commitment, and consistent reinforcement through policies, programmes, and communications.

Emirates NBD is proactively embedding climate consciousness and ESG themes into its broader culture transformation agenda. The ESG agenda is explicitly tied to the Group's purpose and values, reflecting the idea that sustainable banking is integral to long-term value creation.

Leadership Tone and Strategic Direction
The strategic direction set by senior leadership is a key driver of cultural change. Group executives, including the GCEO, GCSO and other EXCO members, regularly communicate the importance of sustainability in shaping future growth, risk resilience, and long-term competitiveness. These messages are shared through internal leadership forums, staff townhalls, and performance dialogues, reinforcing climate and ESG priorities as integral to the Group's values and success. This "tone from the top" is supported by structured engagement on climate themes through Group ESG and business leadership, helping to signal the importance of sustainability across both governance and culture.

Integration into Internal Communication and Engagement
To build awareness and promote behavioural change, the Group has introduced a range of internal engagement tools and communication channels focused on ESG and climate-related topics. These include:

- Regular ESG and climate features in internal newsletters.
- Learning series and webinars led by the ESG function or external experts.
- Sustainability briefings integrated into business updates.
- Interactive sessions showcasing sustainable finance case studies.

These initiatives aim to build a common understanding of the Group's transition goals, demystify technical topics, and highlight how different roles contribute to the achievement of climate targets.

In addition to this, the following initiatives are embedded to support a climate-aligned culture:

- **Employee Engagement and Activation:** The Group regularly organises campaigns, volunteering initiatives, and sustainability-themed events such as Earth Day, Climate Action Month, and ESG Learning Week. These initiatives are designed to build awareness and promote ownership of the transition strategy.
- **Recognition and Awards:** ESG-linked performance is celebrated at Group-level supporting both recognition and inclusion in the GEM annual awards framework. This helps reinforce the importance of sustainability contributions in day-to-day roles.
- **Sustainability Champions Network:** Across the Group, employees are nominated as "Sustainability Champions" to act as focal points for ESG advocacy and implementation within their respective teams. These champions facilitate peer learning, localise messaging, and support behavioural change.
- **Alignment with Ethical Conduct:** The Group's Code of Conduct and Conflict of Interest Policy set clear expectations for ethical behaviour and transparency. The alignment is further strengthened by by standalone policies, including the Supplier Code of Conduct, Data Privacy, Anti-Bribery and Corruption, Anti-Money Laundering, Financial Inclusion, and Health, Safety and Environment policies, and supported by the ESR Framework, helping to embed a climate-aligned culture across the Group.
- **Cultural Integration in Performance and Planning:** Business unit strategies and internal performance dialogues increasingly include climate and ESG performance indicators, fostering cross-functional accountability and clarity on the link between values and execution.

Embedding Climate into Decision-Making Norms
Cultural alignment is also advanced through the practical integration of climate considerations into business operations and decision-making norms. The Group's ESG approach encourages employees to actively consider sustainability risks and opportunities when engaging with clients, structuring products, or assessing risk.

Climate factors have been embedded into credit and risk assessments, and internal frameworks now encourage identification of opportunities linked to the Group's sustainable finance ambitions. Through these efforts, sustainability is framed not as a parallel workstream, but as a core component of how the Group defines performance and value.

As Emirates NBD continues to scale its transition delivery, embedding sustainability into the Group's cultural DNA remains central to empowering its people, maintaining stakeholder trust, and driving long-term success across its regional and international footprint.

3.5 Performance Management

To support the delivery of its net zero transition plan, the Group has progressively integrated ESG metrics into its performance framework, by including the metrics in the annual balanced scorecard of Group Senior Management. The Group recognises that linking performance assessment to sustainability outcomes reinforces strategic alignment, drives behavioural change, and enhances accountability for long-term value creation. This strengthens our commitment to drive sustainability initiatives.

Governance and Oversight of Remuneration Strategy
The BNRESGC is responsible for reviewing and approving the Group's remuneration policy. Its remit includes oversight of ESG-linked remuneration components and the alignment of reward structures with strategic sustainability priorities. Informed by input from the GCEO, Group HR, and Group ESG, the Committee ensures that the integration of climate related KPIs into incentive frameworks remains consistent with shareholder interests, international good practice, and Emirates NBD's broader ESG goals.

ESG-Linked Performance Measures
The ESG metrics in Group Senior Management balanced scorecards reflect a mix of qualitative and quantification indicators tied to transition delivery. For example:

- Progress on sustainable finance origination targets.
- Development or execution of climate-sensitive sector strategies.
- Contribution to emissions reduction initiatives.
- Quality and timeliness of climate-related reporting and disclosures.
- Delivery of key transition milestones or frameworks (e.g. taxonomy, policy roll-outs).

While ESG metrics currently form a component of the overall scorecard rather than a standalone pillar, their prominence is expected to increase over time as transition targets mature.

The Group has also signalled its intent to continue refining the granularity and weighting of ESG metrics, in line with global best practices and emerging regulatory expectations (e.g., ISSB, TPT, and UAE Sustainable Finance Framework).

Future Enhancements
This remuneration approach is designed to drive alignment between individual performance, organisational values, and the long-term ambition of net zero. It supports the embedding of climate responsibility at all levels of the organisation and provides a foundation for scalable and transparent delivery of transition goals.

As the Group progresses along its transition pathway, work is underway to strengthen the transparency, traceability, and scope of ESG-linked remuneration. Future enhancements under consideration include:

- Introducing performance thresholds specifically tied to decarbonisation targets.
- Increasing the share of deferred compensation linked to longer-term climate metrics.
- Enhancing Board reporting on ESG incentive structures and outcomes.

These steps will help ensure that incentive mechanisms remain relevant, credible, and aligned with the evolving complexity of transition planning and regulatory expectations.

3.6 Skills, Competencies and Training

Delivering a credible and effective transition to net zero requires a workforce equipped with the knowledge, skills, and technical competencies necessary to understand and act on climate-related risks and opportunities. Emirates NBD recognises that building such capabilities is critical to the success of its strategy, and that targeted investment in learning and development must evolve in step with the Group's transition maturity, regulatory obligations, and stakeholder expectations.

ESG and Climate Learning Across the Organisation
To promote a consistent and organisation-wide understanding of ESG and climate-related themes,

the Group has launched a range of educational initiatives, including:

- Mandatory onboarding modules on ESG principles and Group policies.
- Regular knowledge-sharing sessions led by Group ESG and external experts, covering topics such as climate disclosure regulations, sustainable finance, and transition risks.
- Interactive webinars and panel discussions, often linked to global or regional sustainability milestones.
- Function-specific workshops, across departments to support practical application.
- Upskilling the frontline coverage teams and training to better equip client conversations on business development, climate risk and transition management practices.

These efforts are regularly updated to reflect external standards and peer best practices. Communication campaigns and internal storytelling also help reinforce these themes across the organisation.

Functional Expertise and Technical Capability
In parallel with broad-based awareness, Emirates NBD is strengthening technical capabilities within key business and control functions. Teams within ESG, Risk, Finance, and the front-line business are supported in developing the expertise required to interpret climate scenarios, manage sectoral risks, and apply relevant standards in product development and reporting.

Further to this, we have specialists within EmCap, as well as Project Finance and dedicated Sustainable Finance specialists. These specialists provide deep technical knowledge and play a critical role in driving expertise across the Group, supporting origination of innovation solutions and embedding sustainable finance practices into decision-making.

Collaboration across functions is encouraged to ensure that climate-related knowledge is integrated into financial planning, credit decisions, and risk assessments. In select areas, such as financed emissions methodologies and transition scenario modelling, the Group also partners with external experts to co-develop frameworks and enhance internal capacity. These efforts support a more data-driven and analytically robust approach to transition planning.

Building a Transition-Ready Workforce
To support future transition readiness, the Group is expanding its focus on long-term capability development, with a particular emphasis on high-impact areas. Ongoing priorities include:

- Scaling ESG learning programmes including economic, scientific, and technological expertise for net zero across all levels and subsidiaries.
- Designing sector-specific learning journeys, particularly for emissions-intensive industries.
- Embedding ESG capability indicators into talent and performance frameworks.
- Creating cross-functional learning communities, including ESG champions and transition ambassadors within key departments.
- Establishing feedback loops between business teams and Group ESG to adapt training content to evolving operational needs.

These initiatives will ensure that the workforce remains equipped to support a just, credible, and technically informed transition over the coming decades.
The Group recognises that as expectations evolve and financial regulation matures, climate-related training must shift from general awareness to technical fluency. Accordingly, the Group is committed to developing deep institutional expertise across business lines, supporting climate-informed decision-making, enabling responsible client engagement, and enhancing transition resilience.

3.7 Conclusion

Strong and credible governance is fundamental to the success of the Group's net zero transition. The Group's governance approach, anchored in Board oversight, clear executive accountability, cultural alignment, incentive integration, and targeted capability building, ensures that climate ambition is embedded across the enterprise. These mechanisms not only drive internal alignment but also support transparency, consistency, and stakeholder trust.

As the Group's transition plan matures, its governance model will continue to evolve to reflect regulatory developments, shifting market dynamics, and lessons from implementation. Through strong leadership and deliberate action, Emirates NBD remains committed to delivering a credible, ambitious, and strategically integrated pathway to net zero.

4. Net Zero Ambition

4.1 The Need for Net Zero

The need of achieving net zero emissions stems from the undeniable risks posed by climate change. Rising global temperatures, increasing frequency of extreme weather events, biodiversity loss, and economic instability all underscore the requirement for sustained actions. The Paris Agreement, adopted by nearly 200 countries, set the ambitious target of limiting global warming to 1.5°C (and no more than 2°C) above pre-industrial levels. This goal requires a fundamental transformation of industries, economies, and financial systems.

At the core of this transition is the need to reduce carbon emissions across high-emitting sectors such as energy, manufacturing, transport, and real estate. This necessitates significant investments in renewable energy, energy efficiency, low-carbon technology, infrastructure upgrades, as well as technology to support carbon capture. Financial institutions play a central role in funding the transition, directing capital flows towards sustainable solutions, and ensuring that climate risks are adequately managed across investment and financing/lending portfolios. While sustainable finance supports projects that are already green, transition finance is also essential for high-emission industries looking to adopt lower-carbon models over time.

The Group recognises that a just and orderly transition ensures that businesses and economies are supported through the challenges of decarbonisation. By offering sustainable and transition finance solutions, the Group has an ambition to facilitate the shift away from fossil fuels, promote clean energy adoption, and provide financial products that support sustainable business practices. Aligning financial decision-making with climate goals not only mitigates climate-related risks but also unlocks opportunities for growth and innovation.

4.2 The Group's commitment to Net Zero

The Group is committed to embedding sustainability into its core strategy and operations. The Group recognises the need to take decisive action to achieve net zero and play an enabling role in the region's transition to a net zero economy. This means addressing its own operational emissions while also working closely with clients and stakeholders to accelerate the decarbonisation of key sectors.

The Group's ambition is to support the transition to a net zero economy by embedding sustainability considerations into our overarching business strategy and aligning our financing activities with both regional and global climate goals. This ambition provides the foundation for our approach to reducing greenhouse gas emissions across our operations, supply chain, and financed activities. It is informed by key sectoral considerations and the applicable NDCs of the countries in which we operate.

Our approach is supported by alignment with leading global frameworks, including ISSB, TNFD, and UN Principles for Responsible Banking (PRB), the World Economic Forum (WEF) and the Sustainable Markets Initiative (SMI). Through these initiatives, the Group positions itself as a front runner in advancing transition planning across geographies.

Given the scale and complexity of the transition, this high-level plan serves as a starting point, with more comprehensive sector-specific pathways to be developed in subsequent phases. Our approach is designed to evolve over time in response to regulatory changes, advancements in climate science, technological developments, and market dynamics. By taking a structured and science-aligned approach, the Group aims to contribute to an orderly and effective transition while supporting the long-term resilience of our clients, stakeholders, and economies.

4.3 Commitment to Net Zero as per Country of Operations

The Group operates across a number of key markets, each with varying climate commitments and NDCs. As a Group, we are working to align to these NDC targets across our countries of operations, along with their long-term net-zero ambitions.

Figure 3

The Group's Global Presence

Figure 4

NDC Commitments across the Group – Countries of Operations

Country	Sector	Interim Target	Net Zero Target
UAE	Economy-wide	47% below 2019 by 2035	2050
	Industry	27 % (~–25 MtCO_2 eq by 2035)	
	Transport	20 % (~–6 MtCO_2 eq by 2035)	
	Buildings	79 % (~–56 MtCO_2 eq by 2035)	
	Waste	37 % (~–1.8 MtCO_2 eq by 2035)	
	Agriculture	39 % (~–1.6 MtCO_2 eq by 2035)	
	Power and Water	>50% reduction from 2019 (~≤39 MtCO_2e by 2035)	
Egypt	Electricity	37 % below BAU (~–80 MtCO_2 eq by 2030)	No target
	Transport	7 % below BAU (~–9 MtCO_2 eq by 2030)	
	Oil & Gas	65 % below BAU (~–1.7 MtCO_2 eq by 2030)	
	Industry, Buildings, Waste, Tourism	Mentioned in NDC but no numeric targets provided	
Türkiye	Economy-wide	-41% below BAU by 2030 (unconditional target)	2053
	Energy	35% decrease in energy intensity by 2035 as compared to base year 2022	
KSA	Economy-wide	–278 MtCO_2 eq/year reduction vs 2019 BAU (~–25 % to +14 % by 2030)	2060
India	Economy-wide	-45% carbon intensity vs 2005 by 2030	2070
	Power	50% non-fossil capacity by 2030	
	LULUCF	+2.5–3 GtCO_2eq sequestration by 2030	
Singapore	Economy-wide	60 MtCO_2 eq by 2030 (↓ from 65); 45–50 MtCO_2 eq by 2035	2050
	Covered sectors	Energy, Industry (IPPU), LULUCF, Agriculture, Waste	
	Sector splits	Not quantified individually	
UK	Economy-wide	68 % below 1990 levels by 2030; 81 % by 2035 (excl. aviation & shipping)	2050
	Sector breakdown	No specific % by sector—NDC is economy-wide only	
Austria	Transport	-7.2 MtCO_2eq by 2030	2040
	Electricity	100% renewable electricity by 2030	
	Non-ETS sectors	-36% below 2005 by 2030	
Germany	Economy-wide	-65% below 1990 by 2030	2045
	Energy	-61–62% by 2030 (~175–183 MtCO_2eq)	
	Buildings	-66–67% by 2030 (~70–72 MtCO_2eq)	
	Transport	-40–42% by 2030 (~95–98 MtCO_2eq)	
	Industry	-49–51% by 2030 (~140–143 MtCO_2eq)	
	Agriculture	-31–34% by 2030 (~58–61 MtCO_2eq)	
	Other sectors	-87% by 2030 (~5 MtCO_2eq)	
China	Economy-wide	-65% carbon intensity vs 2005 by 2030	2060
	Power & Energy	25% non-fossil energy share by 2030	
Russia	Economy-wide	Cap at 70–75% of 1990 levels by 2030	No target
Indonesia	Economy-wide	-31.9% uncond.; -43.2% cond. by 2030	2060
	Forestry	17–23% of reductions from forestry	
	Renewables	5% capacity by 2025; 10% by 2035	
	Economy-wide	-30% GHG by 2035	
Bahrain	Energy	-6% energy vs 2009–13 by 2025	2060
	Renewables	5% capacity by 2025; 10% by 2035	
	Economy-wide	-30% GHG by 2035	

In countries where national net zero targets are set for 2060, 2070 or later, we intend to accelerate climate actions beyond local requirements to align with our Group's 2050 Net Zero ambition. This creates a significant challenge, as achieving alignment with 2050 transition pathways requires to support clients in advancing their decarbonization journeys ahead of the pace set by their own governments.

In addition, even in markets where 2050 net zero goals have been adopted, there is often limited clarity around interim targets and defined emissions trajectories. This uncertainty can create barriers for clients navigating their transition, which in turn can affect our strategic planning and implementation.

In response, the Group takes a portfolio-level approach to managing transition risk and opportunity, balancing investments across diverse geographies and sectors. This includes maintaining exposure in regions with stronger climate frameworks, while working closely with clients in less advanced markets to develop science-based, tailored transition strategies. We use scenario analysis to test the resilience of our portfolios under different policy and transition outcomes, ensuring our strategies remain aligned with our net zero commitments.

Additionally, we collaborate with multilateral partners to deploy blended finance solutions that reduce risk and support climate investment in emerging economies, even where policy progress is slower. While we remain committed to sectoral decarbonisation pathways managed at the portfolio level, we recognise that emissions may rise temporarily - whether in specific sectors or across the Group - before they begin to fall in line with long-term decarbonisation goals.

Further to this, Emirates NBD's Global Markets and Treasury department operates a carbon credit trading desk, enabling the voluntary exchange of carbon credits and Renewable Energy Certificates for clients seeking to offset emissions. The service helps local and regional companies, particularly in the aviation and heavy industry sectors in Europe, address current and future carbon footprints in line with European regulatory requirements. The desk reflects the Group's focus on sustainability-linked opportunities arising from global regulatory shifts and highlights its commitment to ensuring regional entities are empowered to operate responsibly in line with both local and international regulations and ambitions.

By embedding sustainability and ESG considerations across its value chain, the Group's diverse strategy positions it strongly to capture new opportunities and support the transition towards a low-carbon economy.

4.4 The Strategy to meet the Net Zero Ambition

Regulations and Reporting	Reducing Operational Emissions	Managing Financed Emissions	Financing Just Transition	Climate Oriented Decision-Making

At the core of the strategy are **the following fundamental principles** that underpin the approach to achieving net zero:

- **Regulations and Reporting** – We are committed to measuring, reporting, and disclosing our progress in alignment with globally recognised frameworks, including the Principles for Responsible Banking (PRB), the ISSB, and the Greenhouse Gas (GHG) Protocol. Our transition plan will continue to evolve based on scientific data, regulatory developments, and stakeholder engagement.
- **Reducing Operational Emissions** - Implementing energy efficiency measures, integrating renewable energy solutions, and enhancing resource management across the Group's premises, data centres, and supply chain to lower direct and indirect emissions.
- **Managing our Financed Emissions** - As financed emissions represent the largest share of our climate impact, we have set the ambition of aligning our financing/lending and investment portfolios with net zero pathways.
- **Financing Just Transition** – We recognise the importance of balancing economic growth with climate action, ensuring that businesses and communities are supported through the transition. Our approach prioritises the mobilisation of sustainable and transition finance to enable an inclusive, credible shift towards a low-carbon economy.
- **Climate Oriented Decision-Making** – Climate-related financial risks are embedded into our governance, risk management, and investment strategies to protect long-term financial stability. We work closely with clients to assess and mitigate transition risks while unlocking opportunities for sustainable growth.

This approach provides a structured foundation for scaling sustainable finance, mitigating climate risk, embedding climate adaptation measures and sustainability across our business activities.

Regulations and Reporting

We recognise that reporting accurate and transparent information in line with regulations is fundamental to delivering on our sustainability commitments and building trust with our stakeholders. By ensuring robust governance, clear disclosures, and measurable progress, we reinforce our dedication to responsible business practices and effective climate action.

Our Strategy includes:

- **Regulatory Alignment and Readiness** – Continuously monitoring and aligning with evolving sustainability-related regulations and supervisory expectations, including those issued by the CBUAE, the SCA, and international bodies, to ensure proactive compliance and readiness for future disclosure requirements.
- **Clear and Consistent Sustainability Reporting** – Providing comprehensive disclosures on our climate impact, sustainability strategy, and risk management approach, ensuring alignment with international standards such as the ISSB, the Task Force on Climate-related Financial Disclosures (TCFD), and the Global Reporting Initiative (GRI).
- **Independent Assurance and Verification** – Subjecting our ESG and climate-related disclosures to independent third-party assurance to enhance credibility and reliability.
- **Governance Oversight and Accountability** – Strengthening board and executive-level governance structures to ensure that climate and sustainability considerations are integrated into corporate decision-making, with defined responsibilities for ESG performance at the highest levels of leadership.
- **Regulatory Compliance and**

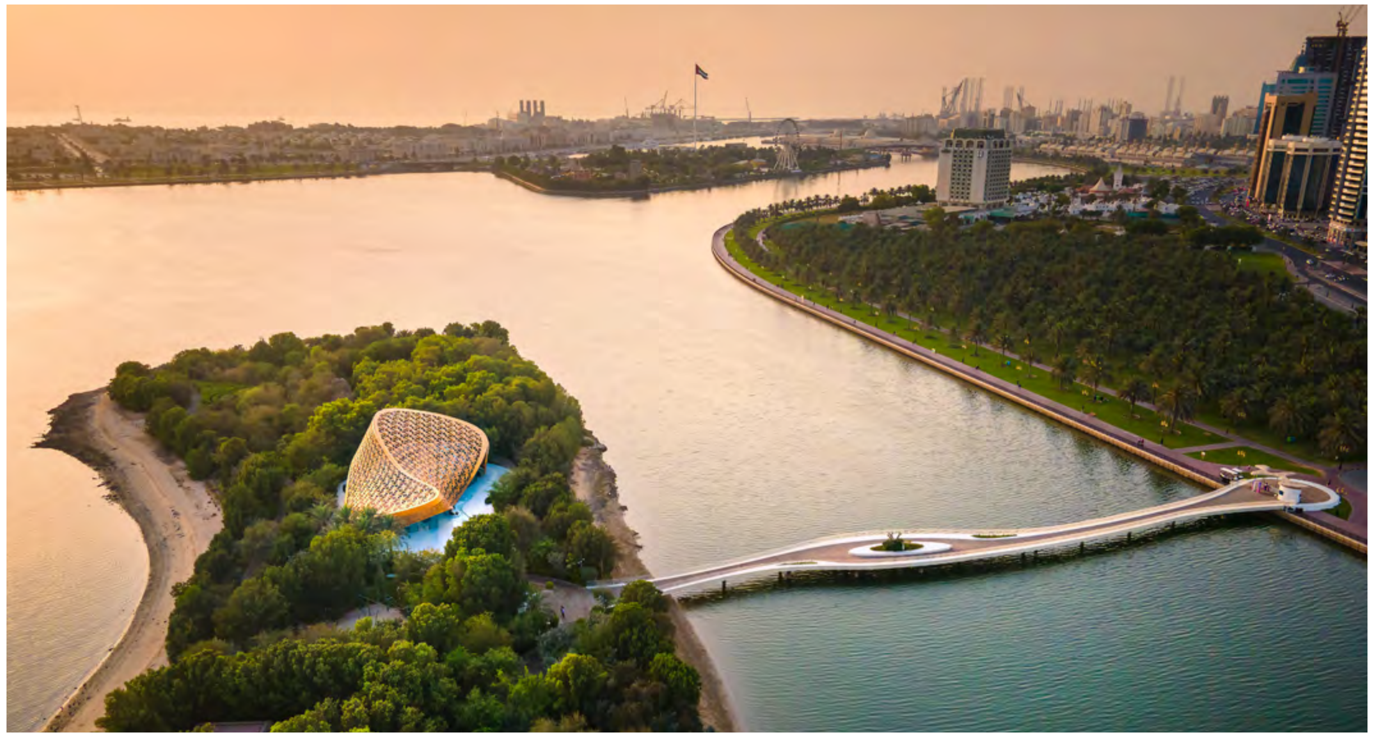
- **Best Practice Alignment** – Ensuring full compliance with evolving global and regional sustainability regulations, including climate disclosure requirements, sustainable finance taxonomies, and anti-greenwashing directives, to maintain the highest standards of corporate integrity.
- **Stakeholder Engagement and Responsiveness** – Actively engaging with investors, regulators, customers, and wider stakeholders to communicate our progress, address concerns, and align our strategy with evolving sustainability expectations.
- **Data Integrity and Continuous Improvement** – Investing in enhanced data collection, monitoring, and reporting systems to improve the accuracy, comparability, and transparency of ESG performance metrics.

By fostering accountability at every level, the Group has an ambition to drive meaningful action and demonstrate commitment to sustainable finance.

Key Regulations and Reporting Initiatives:

- **Regulatory Submissions and Engagements** – Engaging proactively with regulators and industry bodies through regular submissions, consultations and working groups to stay ahead of upcoming sustainability reporting mandates and to contribute to shaping national and regional ESG disclosure frameworks.
- **Annual ESG and Climate Reporting** – Publishing detailed reports on our sustainability performance, risks, and targets to ensure stakeholders have a clear understanding of our progress and commitments.
- **Independent Climate Risk and ESG Audits** – Conducting external reviews and audits of our climate risk management processes and sustainability disclosures to uphold best practices in governance and accountability.
- **Sustainability-Linked Performance Metrics** – Embedding ESG and climate-related key performance indicators (KPIs) into executive remuneration, corporate objectives, and operational decision-making.
- **Transparency in Sustainable Finance Commitments** – Providing clear, evidence-based disclosures on our sustainable finance initiatives, including green and transition financing, to avoid greenwashing and ensure credibility in our sustainability claims.
- **Public Commitments and Industry Collaboration** – Participating in global and regional sustainability initiatives, such as the UN Principles for Responsible Banking (PRB) and the Glasgow Financial Alliance for Net Zero (GFANZ), to enhance collaboration and share best practices in sustainable finance.

Accountability and transparency are at the core of the Group's sustainability strategy. This ensures that the commitments translate into measurable, credible, and impactful outcomes.



Reducing Operational Emissions

While our direct operational emissions are relatively low compared to financed emissions, we recognise the importance of leading by example. We are committed to minimising our environmental impact through:

- **Energy Efficiency & Smart Infrastructure** – Enhancing energy efficiency across our branches, offices, and data centres through technology upgrades and improved building management systems.
- **Renewable Energy Adoption** – Increasing the share of renewable energy in our operations through on-site generation and green power procurement.
- **Sustainable Workplace Practices** – Implementing policies to reduce waste, improve water efficiency, and enhance sustainability in office operations.
- **Business Travel & Fleet Emissions Reductions** – Promoting digital collaboration to reduce travel-related emissions and integrating low-carbon transport options into our corporate mobility policies.
- **Sustainable Procurement** – Embedding sustainability criteria in procurement decisions to minimise upstream emissions.
- **Renewable Energy Certificates** – Offset residual emissions through renewable energy certificates while scaling-up internal measures.
- **Employee awareness programmes**: Expanding on-ongoing efforts to continue employee participation in emissions reduction initiatives.

Further to this, we also aim to reduce our emissions throughout the supply chain. Although our supply chain emissions (Scope 3 upstream) are lower than our financed emissions, we recognise that our procurement decisions can drive sustainability beyond our direct operations. We are integrating ESG criteria into our supplier engagement and procurement processes to enhance environmental performance across our value chain.

Managing our Financed Emissions

The largest proportion of our emissions footprint stems from our financing and investment activities. As a financial institution, we can drive the most significant impact by aligning our portfolio with net zero pathways.

We recognise that different industries have distinct decarbonisation challenges and that sector-specific transition pathways are necessary to support an effective and achievable shift to net zero. Our approach is guided by science-based modelling and regulatory alignment, ensuring that our financing supports sustainable industry transformation.

By embedding climate considerations into our financing strategy, we are ensuring that we support real economy decarbonisation while safeguarding financial resilience.

Key Components of Our Sectoral Pathways:

- **Aligning with NDCs and standards**– In each of our countries of operation, we are ensuring that our sectoral strategies support national climate commitments and regulatory frameworks, anchored around the Group's overarching UAE agenda while aligning with globally recognised standards like Partnership for Carbon Accounting Financials (PCAF)
- **Developing Climate-Aligned Financing Solutions** – We are tailoring financial products, instruments and services and transition finance mechanisms to meet the specific needs of key industries.
- **Engaging with Clients in High-Impact Sectors** – We are actively working with businesses to support their decarbonisation efforts, offering strategic guidance and access to sustainable finance.
- **Internal Transition Risk Assessment** – We will be conducting an assessment on an annual basis of our client portfolio and industries to assess their transition risk. This works to enable more precise and tailored inputs into the analysis.

This sector-specific approach allows us to support economic growth while ensuring alignment with a low-carbon transition.

This high-level overview sets the foundation for our net zero strategy, providing a clear structure for how the Group will support decarbonisation across its operations, financing activities, and value chain. Subsequent sections will detail the specific steps, metrics, and commitments underpinning this strategy.

Financing Just Transition

The UAE's commitment to net zero by 2050, alongside national initiatives such as the Dubai Clean Energy Strategy 2050 and the UAE Energy Strategy 2050, underscores the urgent need for financial institutions to mobilise capital towards climate-aligned investments.

For the Group, this is both a responsibility and an opportunity. We recognise that the financial sector is no longer just a facilitator of economic activity - it is an architect of the future. Our commitment to sustainability is not just about compliance or risk mitigation; it is about ensuring that the businesses we support, the capital we allocate, and the partnerships we foster all contribute to a resilient, inclusive, and low-carbon economy.

As one of the leading financial institutions in the UAE and MENAT region, we are uniquely positioned to drive meaningful change. The UAE's Net Zero by 2050 strategy, alongside its ambitious clean energy and industrial transformation goals, provides a roadmap for sustainable economic growth. By aligning our financing activities with UAE's national priorities and global best practices, we aim to be a catalyst for progress, empowering businesses, strengthening financial resilience, and mobilising capital toward climate solutions.

Our strategy to climate finance is structured around the following key areas:

Scaling Sustainable and Transition Finance
Financial institutions must go beyond traditional financing/lending and investment models to support companies as they transition to net zero. The Group is expanding its sustainable and transition finance offerings to accelerate the shift towards a low-carbon economy.

The Group has committed to supporting the UAE Banking Federation's ambition to mobilise AED 1 trillion in sustainable finance by 2030. To further its commitment, the Group has set target to provision USD 30 billion by 2030 and has developed its Sustainable Finance Framework to issue financial instruments that promote low-carbon, climate-resilient projects and drive positive social impact.

Our sustainable and transition financing activities are guided by leading international frameworks and principles, including relevant principles from Loan Markets Associations (LMA), including Loan Syndications and Trading Association, LMA Green Loan Principles, Sustainability Linked Loan Principles and Social Loan Principles, as well as adhere to ICMA's Green Bond Principles, Social Bond Principles, Sustainability Bond Guidelines and Sustainability Linked Bond Principles, ensuring credibility, transparency, and alignment with global best practice.

Our approach includes, but is not limited to:

- **Green Finance** – Offering green financings/loans, green bonds/sukuk, and green mortgages that fund projects with clear environmental benefits, such as renewable energy, energy efficiency, and sustainable construction.
- **Sustainability-Linked Finance** - Providing financings/loans and bonds/sukuks tied to sustainability performance targets, incentivising businesses to meet specific emissions reduction goals.
- **Transition Finance** - Supporting businesses in high-emitting sectors that are committed to decarbonisation but require structured financing solutions to support long-term emissions reductions.
- **Economic Growth** -Financing innovative projects and technologies encourages the development of cutting-edge technologies contributing the shift to greener practices, generating new roles and skills, creating employment opportunities aligning with future needs.
- **Ecological Finance** - Lending to projects that minimise pollution and resource consumption, focus on energy conservation and waste reduction contributing to cleaner air, water, and soil.
- **Social Cohesion**- Supporting projects that directly or indirectly contribute to improved health, education and living standards through transparent practices and alignment with social objectives.

By scaling financial solutions, the Group is ensuring that businesses have the capital they need to meet their sustainability commitments.

Transition Assessment Methodology:
The Emirates NBD Transition Assessment methodology utilizes a heatmap approach to assess the materiality of financing to ensure that the bank increases alignment to sustainable principles. The methodology detailed in figure 5 outlines the approach to classify sustainable finance and transition finance.

Alignment to sustainable finance and transition finance will be made on an ongoing basis and will be managed and confirmed by GCSO, and the Group ESG department.

Figure 5

Transition Assessment Methodology

	Dedicated Purpose Financing	General Purpose Financing (With a specific use of proceeds)	Sample KPI
Sustainable Finance (Dark Green)	Dark Green Financing aligns to the Sustainable Finance KPIs being highly material and ambitious.	Dark Green Financing aligns to the Sustainable Finance Asset(s) being highly material and ambitious.	LEEDPlatinum, BREEAM Outstanding, Data Centre PUE =1.2, 1.5 Degrees Pathway
Sustainable Finance Aligned (Medium Green)	Medium Green Financing aligns to the Sustainable Finance KPIs being not fully material and not fully ambitious.	Medium Green Financing aligns to the Sustainable Finance Asset(s) not being fully material and not fully ambitious.	LEED Gold, BREEAM Excellent, Data Centre PUE = 1.5
Sustainable and Finance Aligning (Light Green)	Light Green Financing aligns to the Sustainable Finance KPIs being partially material and partially ambitious.	Light Green Financing aligns to the Sustainable Finance Asset(s) being partially material and partially ambitious.	LEED Silver, BREEAM Very Good, Data Centre PUE = 2.0
Transition Finance (Orange)	Orange Financing aligns to Transition Finance that is ambitious in nature, however, has KPIs that are not as robust in classification as sustainable finance.	Orange Financing aligns to Transition Finance that is ambitious in nature howevernot the same degree as Sustainable Finance.	LEED Certified, BREEAM Good, Data Centre PUE = 2.5
Transition Finance Aligned (Yellow)	Yellow Financing only partially aligns to Transition Finance goals and has weakerKPIs.	General Purpose Financing that only partially aligns to Transition Finance Goals.	BREEAM Pass. Data Centre PUE =2.7
Not Aligned to Sustainable or Transition Finance (Red)	Financing that is not aligned to Sustainable or Transition Finance criteria will be detailed as ConventionalFinance. Assets and financing classified have a highpotential to be classified as stranded assets froma Sustainable and Transition assessment. Financing and assets assessed in this wayare not aligned to country netzerotrajectories, 2050 goals or anyrecognised sustainable ortransition pathways.		

Client Engagement
Client engagement is a critical part of our net zero strategy. The ability of our clients to transition will directly shape the pace and credibility of our own pathway, making regular dialogue and assessment essential. Engagement allows us to understand transition risks, identify financing opportunities, and set clear expectations for alignment with long-term climate goals. As the Bank continues to grow, we will apply a structured approach to new-to-bank (NTB) relationships, embedding sustainability considerations from the outset, while also strengthening our approach to existing clients through ongoing dialogue and annual transition assessments. This ensures our portfolio develops in step with the real-economy transition and the UAE's national net zero objectives.

New-to-Bank
As we expand our client base, sustainability considerations will be a core part of how we build new relationships. A disciplined NTB approach ensures that future exposures are consistent with our long-term strategy and national net zero ambitions.

Our approach includes:

Opportunity Identification

New opportunities are identified through relationship teams and external networks, as part of business development activities. At this stage, early-stage considerations may include a high-level understanding of the client's sector exposure, potential transition alignment, and relevance to the Group's long-term strategic objectives. This initial screening supports prioritisation and ensures early focus on clients where ESG factors may later become material to financing discussions.

Assessment

Once potential clients are identified, they are assessed in line with the Group's ESR Framework. The assessment process integrates financial, sectoral, and sustainability factors, including transition alignment against sector pathways, disclosure practices, and the credibility of any stated decarbonisation commitments. For clients in higher-emitting sectors, the assessment also considers alignment with national NDCs and broader net-zero strategies. Negative ESG and climate screening is incorporated into the assessment process and applied alongside standard KYC checks, ensuring that material sustainability risks areassessed and addressed at the outset.

Onboarding

Clients that meet the required standards progress through established governance processes. For higher-impact sectors, this includes enhanced review by risk and sustainability teams to ensure onboarding decisions align with both regulatory expectations and the Group's portfolio-level transition objectives, and escalation for approvals / clearance by relevant committees, where applicable. Where appropriate, transactions may incorporate sustainability-linked features to reinforce alignment.

Enhanced ESG Due Diligence

For clients or transactions considered significant in terms of size, sector, or impact, additional ESG due diligence is applied. This ensures that material new relationships are reviewed in detail for both commercial viability and long-term net zero alignment. Enhanced oversight strengthens portfolio resilience while signalling clear expectations to clients from the outset.

This structured approach allows us to balance portfolio growth with climate responsibility, ensuring that new relationships contribute to the transition journey while maintaining alignment with national and sectoral targets.

Existing Clients
For established client relationships, ongoing engagement is central to our transition strategy. Our objective is to ensure that clients in material sectors are equipped and supported to align with the transition to a lower-carbon economy, while safeguarding portfolio resilience. This means not only assessing risks but also identifying opportunities to partner with clients as they transform their business models.

Our approach includes:

Review

Key clients, particularly those in higher-emitting or transition-sensitive sectors, are subject to annual transition assessments. These reviews consider the quality of climate-related disclosures, progress on setting emissions reduction targets, and the alignment of capital investment plans with national and sectoral pathways. The assessment provides a forward-looking view of client readiness and highlights areas where additional focus is needed. As part of these reviews, clients are mapped by sector, exposure, and other relevant factors. ESG, climate and transition metrics are embedded in client account plans, supported by the application of ESG scores.

Engagement

Relationship teams, supported by dedicated sustainability and risk specialists, maintain structured, ongoing dialogue with clients, setting clear expectations on disclosure, governance, and the development of credible transition strategies. Engagement is designed to encourage transparency, close data gaps, and strengthen clients' ability to respond to evolving policy, market, and technology trends.

Support

Clients with credible and ambitious transition plans are prioritised for financing and advisory support. This may include access to sustainability-linked lending, transition finance instruments, or advisory services to help them meet sectoral and national decarbonisation commitments. Transition plans or strategies are thoroughly reviewed by internal specialists in sustainability and risk teams, emphasising the ESG-linked features embedded within the plan. By supporting leaders and transition-ready clients, we aim to accelerate positive momentum across key industries.

Oversight

For higher-risk or material exposures, progress is tracked more closely. Where clients face significant transition risks or demonstrate limited readiness, enhanced ESG due diligence is applied, and additional governance processes may be triggered. This ensures accountability, while maintaining alignment with our portfolio objectives, regulatory expectations, and long-term net zero goals. Moving forward, oversight will also involve applying an action plan for all clients - starting with addressing identified gaps - followed by monitoring progress (for those willing to commit) and case by case review / decision (with those unwilling).

This structured approach allows us to balance client support with disciplined oversight, ensuring that existing relationships remain consistent with our strategic ambition to align with national climate commitments and the UAE's Net Zero 2050 target.

Supporting Key Sectors in Decarbonisation
While the transition to net zero will impact all industries, certain hard-to-abate sectors face unique challenges in decarbonisation. The Group is committed to:

- **Developing sector-specific financing strategies t**hat align with international best practices and UAE sustainability targets.
- **Engaging with high-emitting industries** to facilitate structured, science-aligned transition pathways.
- **Investing in renewable energy and clean technology** to accelerate the adoption of low-carbon solutions.
- **Supporting our clients** in achieving their net zero targets through tailored financial solutions.

By integrating sectoral pathways into our financing strategy, we ensure that our support is targeted, credible, and aligned with the decarbonisation goals across our countries of operation, and the latest scientific and economic models.

De-risking the Transition through Climate Risk Integration
The transition to a net zero economy presents significant transition and physical risks for financial institutions, investors, and businesses. The Group is committed to integrating climate risks into its financing decisions to ensure that capital is deployed responsibly and effectively. Our strategy includes:

- **Embedding climate risk in credit assessments:** Assessing clients' transition strategies, emissions profiles, and exposure to regulatory risks before extending financing.
- **Aligning our financed emissions measurement** with the Partnership for Carbon Accounting Financials (PCAF) methodology, ensuring transparency and accountability in our financing/lending and investment portfolios.
- **Incorporating net zero considerations into risk modelling** to anticipate potential financial and market shifts associated with climate policies and economic changes.
- **Engaging with clients on their transition risks,** ensuring they have access to advisory and financial products that support decarbonisation while maintaining financial stability.

By proactively integrating climate risk into our financing decisions, the Group is ensuring that our financing/lending and investment activities support an orderly and stable transition.

Setting Exclusions and Restrictions for High-Carbon Activities
As part of our commitment to financing the transition, the Group has a clear exclusion policy for financing activities that do not align with a net zero future. Our approach balances supporting businesses in transition with ensuring that our capital is not used to finance activities that contribute to long-term climate risks.

We do not provide financing for:

- **New thermal coal mining projects** and coal-fired power generation.
- **Unconventional oil and gas exploration** in environmentally sensitive areas, as well as the mining, exploration and upgrading of oil / tar sands.
- **Deforestation-linked activities,** including unsustainable palm oil production, illegal logging, and burning of tropical rainforest.

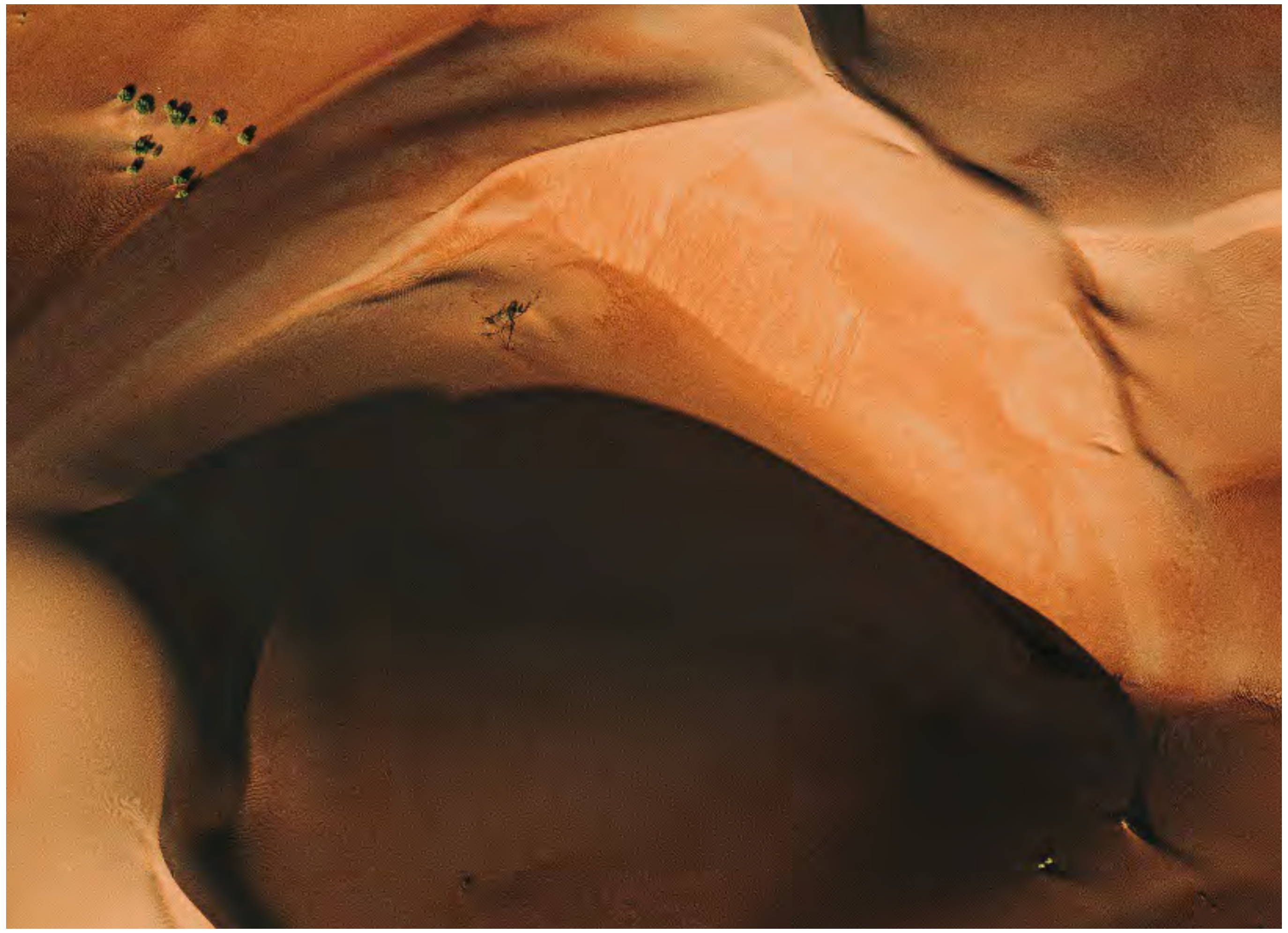
A comprehensive list of our exclusions is detailed within our Group Environment and Social Risk Framework. As global regulations and best practices evolve, we will continue refining this framework to ensure alignment with the latest climate science, investor expectations, and national and global sustainability commitments.

Mobilising Private and Institutional Capital for Climate Finance
Given the scale of investment required for the net zero transition, public and private sector collaboration is essential. The Group is committed to playing a leading role in mobilising institutional capital towards climate solutions. Our strategy includes:

- **Partnering with multilateral institutions and green investment funds** to co-finance large-scale renewable energy and infrastructure projects including diversified syndicated loan deals.
- **Developing innovative climate finance instruments,** such as carbon credit-linked bonds and nature-based investment funds.
- **Facilitating impact investment opportunities** that allow institutional investors to allocate capital towards sustainable and transition-focused projects.
- **Advocating for policy reforms** that enable the scaling of climate finance across the UAE and the wider MENA region.

Through these efforts, we aim to support in bridging the financing gap and unlock new capital flows that support sustainable economic growth and long-term climate resilience.

Supporting the UAE's Position as a Green Finance Hub
As outlined above, the UAE has emerged as a regional leader in green finance, committing to net zero by 2050 and hosting COP28 to drive global discussions on climate action. The Group is committed to supporting the UAE's ambition to become a global green finance hub by aligning our financing strategy with national sustainability initiatives. Key initiatives include:



- **Developing green financial products** that support businesses and investors in accessing sustainable finance.
- **Participating in UAE government-led sustainability initiatives**, including public-private partnerships for climate finance.
- **Enhancing ESG disclosure and reporting practices** to align with the UAE's sustainable finance regulatory framework.
- **Aligning with the emerging supervisory expectations and guidance for banks** on transition planning, climate risk and disclosure to support the UAE's net zero goals.

By reinforcing the UAE's leadership in sustainable finance, the Group is positioning itself at the forefront of regional and global climate action. Through decisive action, responsible financing, and strategic partnerships, we are committed to:

- Empowering businesses to invest in low-carbon solutions.
- Supporting an orderly and just transition for all sectors.
- Ensuring financial stability in the face of climate risk.
- Strengthening the UAE's position as a global green finance leader.

These actions form the foundation of our internal emissions reduction efforts, complementing our broader strategy to decarbonise our financed activities.

Climate Oriented Decision-Making

Recognising the increasing financial and operational risks posed by climate change, we are committed to embedding climate risk considerations into our decision-making processes. By integrating climate risk into our governance, strategy, and risk management frameworks, we aim to enhance the resilience of our business, support clients in navigating the transition, and contribute to a more sustainable economy.

Our strategy includes:

- **Risk Monitoring and Data Integration** – Enhancing climate risk data collection, analytics, and monitoring capabilities to integrate climate considerations into real-time decision-making processes across our financing/lending and investment activities.

- **Integrating Climate Risk into Financing/Lending and Investment Decisions** – Embedding climate-related financial risks into credit risk assessments, portfolio management, and investment decision-making to ensure that climate considerations are systematically factored into our financial activities.
- **Scenario Analysis and Stress Testing** – Conducting climate risk scenario analyses to assess the potential impact of different climate-related risks, including transition risks (policy shifts, market changes, and technological advancements) and physical risks (extreme weather events and chronic climate shifts).
- **Sector-Specific Transition Pathways** – Developing industry-specific guidelines and sectoral pathways to support clients in managing their transition risks, with a focus on aligning financing strategies with the Paris Agreement goals.
- **Enhanced Due Diligence for High-Risk Sectors** – Strengthening risk evaluation processes for industries with significant exposure to climate-related risks, ensuring that our engagement and financing strategies support credible transition plans aligned with net zero pathways.
- **Strengthening Governance and Oversight** – Establishing clear governance structures to monitor climate risk, with board-level oversight and dedicated ESG committees responsible for driving climate integration across the organisation.
- **Stakeholder Engagement on Climate Risk** – Engaging with regulators, policymakers, industry bodies, and clients to promote the adoption of climate risk management best practices, encourage knowledge sharing, and align with evolving regulatory expectations.
- **Embedding Climate Risk into Enterprise Risk Management** – Strengthening our internal risk management frameworks to ensure climate-related risks are consistently assessed alongside credit, market, operational, and reputational risks.
- **Aligning with Global Frameworks and Regulatory Standards** – Incorporating recommendations from the TCFD, the ISSB, and the Basel Committee's guidance on climate risk management to ensure best-in-class integration of climate risk across our financial activities.

Further to this, we recognise that climate risk is not a standalone issue but one that is interconnected with financial stability, economic growth, and social outcomes. By embedding a forward-looking approach to climate risk management, we aim to build resilience across our portfolios, ensure financial stability, and support our clients and communities in adapting to climate-related challenges.

5. Transition at the Group

5.1 Overview

The Group recognises that achieving net zero by 2050 requires a structured, long-term approach that addresses both our internal operations and our financed emissions. This section outlines our high-level net zero pathways, detailing how we plan to reduce our direct operational emissions while aligning our financing and investment activities with a credible, orderly, and just transition.

As a financial institution, the largest impact we can have is through our financed emissions. Therefore, our net zero strategy prioritises portfolio-wide decarbonisation, ensuring that capital is directed toward sustainable, low-carbon solutions. At the same time, we are committed to reducing our own operational footprint, ensuring that our internal activities align with the sustainability principles we promote.

In this section, we present our long-term transition pathways for both internal operations and financed emissions, providing a framework that supports our ambition to drive real-world emissions reductions while ensuring financial stability and economic resilience.

5.2 Addressing our Operational Emissions

Internal Operations – Scope 1, 2, and 3 (excluding Financed Emissions)

The Group is committed to minimising the environmental impact of our own operations by reducing emissions across Scope 1 (direct emissions), Scope 2 (indirect energy emissions), and Scope 3 (value chain emissions, excluding financed emissions). While financed emissions account for the largest share of our carbon footprint, we recognise the importance of leading by example in improving the sustainability of our offices, branches, and overall operations.

The Group has taken up the below outlined targets to meet the goal of Net Zero by 2050.

Operational Emissions Reduction:

Category	Target	Time Horizon
Emissions Reduction	5% reduction in Scope 1 & Scope 2 per year until 2027against 2023 baseline	Short-term
	30% reduction in Scope 1 & Scope 2 by 2030 against 2023 baseline	Medium-term
	Net-zero by 2050	Long-term

Our approach is underpinned by a focus on operational efficiency, renewable energy integration, sustainable procurement, and robust employee engagement. The key initiatives detailed below are aligned with the Group's Annual ESG Report 2024 and reflect our commitment to global best practices and the UAE's Net Zero ambitions.

Scope 1: Direct Emissions

Scope 1 emissions arise from sources owned or controlled by the Group – for instance, fuel combustion in our vehicle fleet, backup generators, and on-site heating systems. Our initiatives include:

Transitioning to a Low-Carbon Fleet

- **Electrification of Vehicles** - We are actively replacing internal combustion engine vehicles with electric and hybrid alternatives. This commitment is complemented by our support for the electric vehicle market, including offering competitive financing solutions such as 0% finance for EV purchases during special promotions.
- **Green Mobility Pilots** - We continue to pilot green mobility initiatives aimed at reducing business travel emissions through low-emission transport solutions.

Reducing Fossil Fuel Dependency in Buildings

- **Optimised Heating and Cooling** - We are phasing out fossil fuel-based systems, moving towards more energy-efficient alternatives. Optimising generator use through the adoption of battery storage and cleaner energy sources further supports this transition.
- **On-Site Renewable Investments** - We have deployed solar panels at key locations to reduce reliance on grid electricity and lower our direct emissions.

Scope 2: Indirect Emissions from Purchased Energy

Scope 2 emissions result from the electricity, heating, and cooling we purchase to power our offices, branches, and data centres. Our strategy includes:

Enhancing Energy Efficiency

- **Building Upgrades** - We are upgrading facilities with LED lighting, smart building management systems, occupancy sensors, and automated temperature controls.
- **Energy-Efficient Infrastructure** - Retrofitting and constructing new buildings to achieve certifications such as LEED or equivalent standards further minimises energy usage.

Increasing Renewable Energy Procurement

- **Renewable Projects** - The Group's investment in renewable energy projects, including a solar plant in Türkiye, underscores our commitment to reducing indirect emissions and supporting regional clean energy development.
- **Regional Clean Energy Programmes** - Participation in regional carbon offset and clean energy programmes helps further decarbonise our operations.
- **Renewable Energy Certificates (RECs)** – Purchase of RECs, which guarantee that an equivalent amount of renewable energy has been generated and supplied to the grid. This forms the backbone of our current approach.

Looking Ahead

While RECs have enabled us to reduce our Scope 2 emissions footprint in the near term, our longer-term ambition is to diversify this strategy by combining RECs with direct renewable energy procurement, regional clean energy partnerships, and on-site solutions. This will enhance resilience, reduce reliance on certificates alone, and strengthen the credibility of our decarbonisation pathway.

Scope 3: Indirect Emissions from Our Value Chain (Excluding Financed Emissions)

Scope 3 emissions, excluding financed emissions, cover emissions from our supply chain, employee commuting, business travel, waste disposal, and other indirect activities. Our initiatives include:

Embedding Sustainability in Procurement

- **ESG-Driven Supplier Selection** - We integrate ESG criteria into our vendor selection processes. This ensures that our suppliers are committed to emissions reduction, sustainable sourcing, and circular economy practices.
- **Low-Carbon Procurement Policies** - We prioritise products and services that align with our sustainability goals, ensuring that our procurement decisions contribute to overall emissions reductions.

Reducing Travel and Commuting Emissions

- **Remote Work and Virtual Collaboration** - By promoting remote work and digital collaboration, we aim to significantly reduce travel-related emissions.
- **Low-Emission Commuting** - We support initiatives such as public transport incentives, carpooling programmes, and the installation of electric vehicle charging infrastructure to encourage low-emission commuting.

Waste and Resource Management

- **Sustainable Materials and Recycling** - Efforts to reduce single-use plastics and shift towards sustainable materials are underway. Enhanced waste segregation and recycling programmes across our offices and branches further contribute to our emissions reduction targets.
- **Digital Transformation** - Transitioning to paperless banking and leveraging digital platforms minimises the environmental impact associated with printed materials.

Next Steps in Our Operational Decarbonisation Journey

The Group acknowledges that while significant progress has been made, achieving net zero requires ongoing investment, innovation, and collaboration. Moving forward, we will:

- Expand renewable energy procurement to further reduce Scope 2 emissions.
- Continue the electrification of our vehicle fleet.
- Enhance supplier engagement to ensure procurement practices fully align with our net zero ambitions.
- Improve emissions measurement and reporting to accurately track progress across Scope 1, 2, and 3.
- Foster increased employee engagement through targeted sustainable workplace initiatives.

Through these actions, the Group is ensuring that our internal operations set a high standard for sustainability leadership, underpinning our broader commitment to a resilient, low-carbon future.

5.3 Our Commitment to Net Zero Financed Emissions

As a leading financial institution, the Group recognises that our most significant contribution to climate action comes from how we allocate capital. Financed emissions represent the largest share of our overall carbon footprint, and therefore addressing these emissions is therefore a core pillar of our net zero strategy. The Group has been measuring financed emissions since 2023, and we will continue to publish these on an annual basis with assurance.

Our approach is designed to support us in working towards our ambition of an orderly, just, and economically viable transition to net zero while safeguarding financial stability and economic growth.

To achieve this, we have developed:

- **Clearly defined principles** to support our methodology and approach to setting emissions reduction targets in our portfolio.
- **A structured approach to climate scenario analysis,** incorporating a range of transition models, data sources, and market assumptions.
- **An overarching ambition for our 2050 target,** aligned with the UAE's Net Zero by 2050 Strategy and the NDCs targets for countries in which we operate.
- **A risk-aware transition framework** that considers macroeconomic factors such as business growth, inflation, and policy uncertainty.
- **Alignment with the Principles for Responsible Banking (PRB)** to ensure our net zero approach is credible, science-aligned, and aligned with global financial sector best practices.

Through this strategy, we aim to finance a low-carbon economy, support clients in their transition, and position the Group as a key enabler of climate-aligned growth in the UAE and beyond.

The Group has developed its first Transition Plan, prepared with reference to latest sector guidance from the TPT and considering overall alignment to NDC targets across our countries of operation. We have considered the following sectors and activities within this Transition Plan:

- Agriculture
- Oil & Gas
- Mining & Quarrying
- Manufacturing
- Utilities
- Construction
- Transportation
- Telecommunication

The below table maps the sectors above to the economic activities as per the Pillar 3 report and details our respective Net Zero Commitments across these sectors. These sectors have been mapped in consideration of national decarbonisation commitments and targets, particularly the NDCs of the countries in which we operate. This approach supports our efforts to engage constructively with clients, drive sectorial alignment, and enable effective tracking of transition progress.

This has been further expanded on in depth in the subsequent sections.

Figure 6

Emirates NBD Activities to NDC Mapping

Sector	Emirates NBD Economic Activities	NDC Mapping (if applicable)[3]
Agriculture	Agriculture, fishing & related activities	Agriculture
Oil & Gas	Crude, oil gas, mining & quarrying	N/A
Mining & Quarrying		
Manufacturing	Manufacturing	Industry
Utilities	Electricity & Water	Power & Water
Construction	Construction	Buildings
	Real Estate	Buildings
Transportation	Transport, Storage and Communication	Transport
Telecommunication		N/A

[3]Refer to the respective NDC targets in the 'NDC Commitments across the Group - Countries of Operations' table above.

Our framework is designed to align with national climate commitments, including the NDCs. As part of our broader transition planning framework, our ambition is to establish a robust, intensity-based methodology that measures and manages the emissions efficiency of our financing activities. This approach will enable us to integrate climate considerations into our core business decisions while maintaining a balanced pathway that supports both sustainable economic development and financial stability. By focusing on emissions intensity, we will be able track progress towards lower-carbon outcomes while remaining responsive to sectoral growth, technological change, and client transitions.

We aim to facilitate and finance our clients' transitions toward lower-carbon and more resilient operating models. Developing intensity-based targets will allow us to measure the relative emissions performance of our portfolio and to engage constructively with clients on their own decarbonisation pathways. Our sector-level targets will be developed to reflect the direction of national climate goals and the evolving composition of our portfolio, taking into consideration sector-specific characteristics, such as emissions profiles, technological availability, and policy trajectories. The Group's principles are designed to balance climate ambition with economic feasibility, ensuring that our financing activities support both long-term net zero goals and near-term policy-driven commitments. **This ambition is subject to a number of dependencies, as outlined in the section below.**

Limitations of Financed Emissions as a Net Zero Metric

Financed emissions are a useful baseline and tracking tool, but they are not a complete measure of portfolio alignment with net zero. They should be treated as one component of our wider net zero strategy, complemented by forward-looking assessments and sector-specific context.

Where financed emissions fall short:

- **Backwards-looking and volatile** - Estimates reflect historic activity and methodological choices; annual changes can be driven by data updates, methodology shifts, or portfolio churn rather than real-economy decarbonisation.
- **Exposure vs. impact confusion** - Reducing financed emissions by exiting clients or sectors can lower our footprint on paper without reducing real-world emissions, especially if assets are refinanced elsewhere.
- **Data quality and coverage gaps** - Incomplete client disclosures, estimation for Scope 3, and double counting (across lenders or value chains) limit precision and comparability.
- **Insensitive to transition readiness** - Similar current-year intensities can mask very different trajectories (e.g., a client with a credible transition plan vs. one without).
- **Sector heterogeneity - Intensity metrics are n**ot always comparable across subsectors (e.g., process-emission heavy vs. power-dominated industries), risking misleading portfolio signals.
- **Ignores enabling financ**e - Capital for solutions (grids, storage, green materials, adaptation) can temporarily raise financed emissions even when it accelerates system-level decarbonisation.

Building on Financed Emissions

Financed emissions can only be part of the strategy:

- Net zero requires real-economy change; portfolio metrics must be tied to clients' transition plans, sector pathways, and credible capex commitments.
- A sole focus on portfolio numbers can create perverse incentives (e.g., divestment over engagement) and misprice transition risk.

Alongside financed emissions we will add:

- **Client transition risk assessment** - We will assess our most material clients and sectors against their stated transition commitments, alignment to national climate targets, and readiness to adapt to a lower-carbon economy. This will provide a clearer view of long-term portfolio resilience than financed emissions alone.
- **Transition Assessment Methodology** – We will embed our structured Transition Assessment Methodology (Figure 5.) to enable us to evaluate whether financing qualifies as green, transition or conventional.
- **Forward-looking sectoral alignment** - Portfolio alignment will be measured against sector-specific pathways to 2050, rather than only using financed emissions.
- **Facilitated emissions roadmap** - Transparent treatment and progressive measurement of capital markets activities, recognising their role in real-economy outcomes.
- **Green/transition finance tracking** - Metrics for volumes and outcomes of finance that enable decarbonisation (e.g., grid upgrades, industrial efficiency, low-carbon materials).
- **Risk integration** - Transition considerations will be embedded more broadly into our decision-making by linking portfolio strategy, engagement, and financing decisions to long-term net zero objectives. Additionally, qualitative, and quantitative climate considerations will be incorporated in proposal and credit underwriting. This will ensure our approach reflects both climate ambition and the broader economic context.

Implications for our approach:

- We will use financed emissions to baseline and monitor, but steering decisions will be anchored in client-level transition risk and sectoral viability.
- Priority sectors and counterparties will be identified based on materiality and transition readiness, with clear engagement expectations and escalation pathways.
- Progress will be reported using a dashboard that combines financed emissions trends with forward-looking alignment and risk indicators, giving a truer picture of net zero progress.

Dependencies

It is our ambition support alignment to sectorial NDCs across our countries of operation, and the UAEs National Net Zero 2050 target. However, achieving this ambition is dependent on several external conditions being met. These include the introduction and enforcement of enabling policy and regulatory frameworks, the availability and affordability of low-carbon technologies, and broader sectoral shifts towards sustainable practices, and continued economic stability and public investment in transition infrastructure, such as clean energy, green mobility, and sustainable materials. Our role is to enable and support this transition through our financing activities, whilst recognising that progress towards the transition is contingent on these foundational enablers.

These assumptions and dependencies are further detailed within the 'Key Risks and Uncertainties' section of the NZTP.

Whilst our approach is built on robust climate data and policy frameworks, we recognise that the transition to net zero is dynamic, influenced by technological advancements, regulatory developments, and economic conditions. To ensure continued alignment, we will:

- **Regularly assess progress** against national targets, sectorial emissions intensity and NDCs across our countries of operation.
- **Define intensity-based targets** to measure progress towards lower-carbon outcomes.
- **Adjust sectoral strategies** to reflect evolving national policies, industry trends, and low-carbon investment opportunities.
- **Engage with regulators, industry leaders, and global climate bodies** to ensure that our emissions reduction framework remains relevant, effective, and responsive to emerging transition needs.

5.4 Sector Deep-Dive

Over the following pages, we provide sector-level breakdown outlining key decarbonisation levers, transition challenges and areas of focus.

Agriculture

Overview:
As at end-2024, the Group's total funded exposure to the Agriculture sector stood at AED 16.2 billion, representing approximately 1.6% of the portfolio. The agriculture sector is a notable contributor to greenhouse gas emissions, particularly through fertiliser use, livestock activity, and land management.

The sector also faces increasing pressure related to water consumption, land degradation, biodiversity impacts, and climate resilience. At the same time, it plays a central role in food security and livelihoods, particularly in emerging markets. The transition pathway for agriculture is therefore complex, balancing the dual challenge of reducing emissions while ensuring productivity, resilience, and sustainable resource use.

This complexity is further heightened in water-scare regions like the UAE and wider MENA region, where agricultural activity is inherently resource-intensive and highly exposed to physical claimte risks. Evolving global expectations, such as deforestation-free supply chains, traceablity, and nature protection, are also beginning to reshare operating conditions for producers and exporters. These factors reinforce the need for targeted support across the value chain to advance climate-smart practices, enhance resilience, and ensure that the sector remains aligned with both local priorities and international transition pathways.

Net Zero Objective:
For the Agriculture sector, we hold an ambition to align with the UAE's Agriculture NDC commitment and Net Zero by 2050. Our focus is on enabling financial solutions that promote sustainable agricultural practices, reduce emissions from fertilisers and livestock, and improve water-use efficiency in arid environments. We also recognise that agriculture plays a critical role in ensuring food security, and therefore the transition must balance the need for reliable food production with emissions reduction targets. Supporting cliets to adopt environmentally responsible and green (ERG) farming practices,whilst promoting climate-smart and climate-resilient operations, will be central to achieving this ambition.

Decarbonisation Levers:
To achieve our interim targets and our overarching Net Zero ambition, we will focus on the below sector-specific decarbonisation levers for the agriculture industry. These levers reflect both our financing priorities and our role in supporting clients and sectors in their transition journeys.

- Enhance the labelling and tracking of sustainable products.
- Promote the use of technology to reduce waste.
- Engage with clients to align agricultural practices with UAE's NDC and net zero targets.
- Integrate climate and nature risk considerations into credit assessments and sectoral due diligence.
- Support sustainable supply chains by encouraging adoption of traceability and certification standards.
- Exclude financing to agriculture operations linked to deforestation and / or illegal logging.
- Monitor sector-level exposure and emissions to develop appropriate transition engagement strategies.
- Participate in cross-sectoral initiatives to promote climate-smart agriculture and improve ESG data availability.

Oil & Gas

Overview:
The Group's exposure to Crude Oil, Gas, Mining & Quarrying stood at AED 3.1 billion at end-2024, representing 0.3% of the funded credit book. The sector is highly carbon-intensive, with transition pathways shaped by large-scale infrastructure, capital-intensive technologies, and policy-driven market dynamics. As per the economic activities for the Group, oil and gas, mining and quarrying are considered under one activity.

Oil and gas remain central to global energy systems, but are increasingly subject to pressure from policy, investor, and market stakeholders to reduce emissions.

As transition momentum accelerates globally, companies in this sector are under growing pressure to demonstrate credible decarbonisation plans, respond to stricter disclosure requirements, and mitigate nature and biodiversity risks, particularly in ecologically sensitive areas. In the context of the UAE and broader MENA region, where oil and gas remain strategic economic pillars, the transition will require a phased and pragmatic approach that balances emissions reduction with energy security and economic diversification. This highlights the importance of engaging clients on technology adoption, methane abatement, and nature-related impacts while supporting opportunities for circularity and alternative low-carbon solutions.

Focus Area:
For the Oil &Gas sector, we have an ambition to align with Net Zero 2050, recognising its importance to both national economies and global energy markets. Considering the Group's exposure to the oil and gas sector, it is on low priority for this transition plan, however our focus is on supporting an orderly transition that balances near-term energy security with long-term decarbonisation pathways. This includes maintaining engagement with clients as they adapt to growing expectations on disclosure, transparency, and transition planning, while ensuring our portfolio remains consistent with the broader net zero ambition.

Decarbonisation Levers:
To achieve our interim targets and our overarching Net Zero ambition, we will focus on the below sector-specific decarbonisation levers for the Oil & Gas industry. These levers reflect both our financing priorities and our role in supporting clients and sectors in their transition journeys.

- Advance methane reduction and flaring minimisation through financing abatement technologies.
- Support the deployment of CCUS and scalable low-carbon hydrogen projects.
- Encourage electrification of upstream assets and renewable integration across operations.
- Finance energy efficiency improvements in refining, liquefaction, and transport processes.
- Strengthen client engagement on enhanced climate disclosure, transition strategies, and resilience planning.
- Transition to non-fossil fuel energy business through our financing/lending activities.

Mining & Quarrying

Overview:
The Group's exposure to Crude Oil, Gas, Mining & Quarrying stood at AED 3.1 billion at end-2024, representing 0.3% of the funded credit book. This industry is high-emitting and resource-intensive, with transition pathways that rely on technology deployment, operational optimisation, and carbon management strategies.

Mining and quarrying remain important contributors to economic development, providing raw materials for construction and manufacturing. However, they face transition challenges due to their reliance on heavy machinery, diesel transport, and energy-intensive operations. Opportunities are emerging in electrification, renewable integration, and circular resource use, but scaling these solutions across the sector remains complex.

Focus Area:
For the sector, we have an ambition to align with Net Zero 2050, recognising its economic contribution and environmental impact. Our focus is on supporting an orderly transition that balances near-term production needs with long-term decarbonisation pathways. This includes active engagement with clients as they adapt to stricter expectations on disclosure, transparency, and transition planning, while ensuring our portfolio remains consistent with the Group's net zero ambition.

Decarbonisation Levers:
To achieve our interim targets and our overarching Net Zero ambition, we will focus on the below sector-specific decarbonisation levers for the Mining & Quarrying sector. These levers reflect both our financing priorities and our role in supporting clients and sectors in their transition journeys.

- Support electrification of mining and quarrying equipment.
- Encourage adoption of renewable power in energy-intensive operations.
- Promote circular resource use through recycling of materials and waste reduction.
- Embed ESG considerations into project financing, particularly for operations in ecologically sensitive areas.
- Encourage clients to adopt advanced monitoring and reporting of methane, dust, and other environmental impacts.
- Exclude financing to operations linked to mining, exploration, and upgrading of oil / tar sands.
- Financing transition for the sector to reduce reliance on fossil fuels.

Manufacturing

Overview:
Manufacturing accounted for 3% of the Group's total funded exposure at end-2024, amounting to AED 30.1 billion. The sector covers a broad spectrum of industrial activity, ranging from light assembly to energy- and materials-intensive production. As industrial processes often involve significant emissions, manufacturing is an important area of focus within national and international decarbonisation strategies.

Manufacturing emissions arise largely from the production process itself, driven by high-temperature heat, electricity consumption, and chemical reactions in sectors such as cement, steel, and chemicals. Circular economy measures such as recycling, and reuse of industrial inputs provide further opportunities to cut embedded carbon. Increasingly, manufacturers are being called upon to adopt cleaner technologies, improve energy efficiency, and reduce waste across operations.

The sector is increasingly exposed to transition risks, including policy shifts, regulatory tightening, rising input costs, and potential reputational impacts linked to carbon-intensive operations. These pressures are reshaping the operating environment for manufacturers, influencing investment decisions, and altering how climate-related risks are assessed across the value chain.

Focus Area:
For the manufacturing sector, we hold an ambition to support the alignment with the UAE's Industry NDC and achieving net zero by 2050. This will support the shift toward low-carbon production by 2050. Recognising the sector's complexity and varied emissions intensity, we will focus on financing efforts that support industrial decarbonisation, including cleaner production technologies, energy efficiency improvements, and sustainable materials. Our efforts will prioritise credible transition activities that enable long-term emissions reductions across harder-to-abate subsectors.

Decarbonisation Levers:
To achieve our interim targets and our overarching Net Zero ambition, we will focus on the below sector-specific decarbonisation levers for the Manufacturing industry. These levers reflect both our financing priorities and our role in supporting clients and sectors in their transition journeys.

- Work with clients to improve industrial energy efficiency and transition to low-carbon inputs.
- Encourage adoption of circular economy principles through corporate ESG engagement.
- Incorporate emissions intensity benchmarks into portfolio review processes.
- Support sector-wide industrial decarbonisation programmes at national and regional levels.
- Monitor alignment with climate policy shifts affecting heavy industry and manufacturing value chains.
- Provide financial instruments like green bonds and loans for projects with specific environmental benefits like low emissions steel production.

Utilities

Overview:
The Group's exposure to the Utilities sector amounted to AED 5.4 billion at end-2024, accounting for 0.5% of the funded portfolio. The sector plays a central role in national infrastructure, and its decarbonisation is critical to enabling transition across other sectors. With growing investment in renewable energy, grid modernisation, and water-use efficiency, this sector is at the forefront of change.

Utilities, specifically electricity, remain as one of the highest-emitting sectors globally, with transition challenges linked to the fossil fuel energy mix, demand growth, and legacy generation assets. However, the shift toward solar, nuclear, and clean grid technologies is accelerating, particularly across the GCC. The water segment, particularly in water-scarce countries like the UAE, presents a unique emissions profile due to the energy intensity of desalination and water pumping. Improvements in reverse osmosis, smart metering, and leak reduction offer increasing opportunities to decouple emissions from water provision.

As decarbonisation efforts intensify, the sector also faces growing scrutiny around grid stability, energy pricing, and the integration of variable renewable sources. These challenges are particularly relevant in rapidly growing economies, where rising demand and infrastructure expansion must be balanced against emissions goals and resource constraints. At the same time, increasing regulatory and investor attention on the climate and water nexus is driving momentum for more sustainable models of electricity generation and water provision.

Focus Area:
For the Utilities sector, we are working to align and support the UAE's Energy Strategy 2050, which aims to balance meeting the rising energy demand and sustaining natural resources. Further to this, we have set an ambition to supporting alignment with the UAE NDC for Power & Water, and the national Net Zero 2050 commitment. This is driven by power sector transformation and water infrastructure upgrades. Our focus will be to finance renewables, promote demand-side efficiency, and reduce emissions intensity across generation, transmission, and desalination systems. These investments will be instrumental in delivering interim targets and a net zero system by 2050.

Decarbonisation Levers:
To achieve our interim targets and our overarching Net Zero ambition, we will focus on the below sector-specific decarbonisation levers for the Utilities industry. These levers reflect both our financing priorities and our role in supporting clients and sectors in their transition journeys.

- Align electricity and water exposures with national energy strategies, including renewable energy integration and grid efficiency.
- Support utilities in developing credible transition plans aligned to long-term net zero outcomes.
- Apply enhanced climate risk analysis in financing decisions for energy and water infrastructure.
- Engage with regulatory bodies and clients to support sector-wide decarbonisation pathways.
- Track progress of financed utility clients against climate and water resilience benchmarks.
- Increase financing/lending for large scale renewable energy projects like solar plants.

Construction

Overview:
With AED 56.9 billion in funded exposure as at end-2024, the Construction sector (including Real Estate) represents around 5.68% of the Group's portfolio.

The construction sector is a significant source of emissions through the use of carbon-intensive materials such as cement, steel, and glass, as well as from energy consumption during project execution. Construction emissions are closely tied to the built environment and the long-term performance of buildings and infrastructure. This places greater emphasis on sustainable design, material selection, and energy-efficient standards in new developments and retrofits.

With rising demand for green buildings, sustainable materials, and energy-efficient design, the sector presents opportunities for climate-aligned innovation. At the same time, the sector faces increasing exposure to transition risks stemming from evolving building codes, climate disclosure requirements, and the rising cost of carbon-intensive materials. These pressures are accelerating interest in alternative construction methods, low-carbon materials, and digital tools to track and manage emissions performance across the project lifecycle. As urbanisation and infrastructure investment continue across the region, the construction sector has a critical role to play in enabling more sustainable, future-ready built environments.

Focus Area:
For the construction sector, we are supporting alignment with the UAE's Buildings NDC and the national Net Zero 2050 commitment. Our financing efforts are directed toward green building design, sustainable construction materials, and retrofitting projects that contribute to long-term climate objectives. We actively support adherence to recognised sustainability standards, including LEED, BREEAM, and Estidama, and acknowledge that all new buildings in the UAE are developed in line with national efficiency codes. In addition, we are financing the uptake of lower-carbon construction inputs, such as low-carbon steel, to help reduce embedded emissions across the built environment.

By working to embed circularity, digital tools, and renewable energy integration into construction and property projects, we will support both emissions reduction and climate resilience.

Decarbonisation Levers:
To achieve our interim targets and our overarching Net Zero ambition, we will focus on the below sector-specific decarbonisation levers for the Construction industry. These levers reflect both our financing priorities and our role in supporting clients and sectors in their transition journeys.

- Promote low-carbon development by embedding ESG considerations into construction finance and property finance criteria.
- Expand sustainable finance solutions, through leveraging revolving credit structures to introduce sustainability-linked features such as green KPIs and use-of-proceeds tracking.
- Encourage clients to adopt industry-leading sustainability standards across the built environment.
- Financing retrofits and upgrades that improve energy performance and resilience of existing buildings.
- Integrate building performance metrics into real estate portfolio monitoring frameworks.
- Align construction portfolio with UAE green building codes and energy intensity reduction targets.
- Collaborate with regulators and urban planners to enable decarbonised construction practices.
- Support transition through financing practices to reduce negative environmental impacts like encouraging use of sustainable materials in construction.

Transportation

Overview:
With AED 42.9 billion in total funded exposure at end-2024, Transport, Storage and Communication represented approximately 4.27% of the Group's portfolio. This sector is one of the most significant contributors to global emissions, primarily due to fuel-intensive road freight, aviation, and shipping, alongside rising demand for logistics services. As per the economic activities for the Group, Transport, Storage and Communication are considered under one activity.

As momentum builds around electrification, modal shifts, and logistics optimisation, the sector is undergoing transformation that presents both risks and opportunities. Its inclusion in the Group's Net Zero Pathway reflects its relevance to national mobility goals and the broader transition landscape.

Focus Area:
The Transportation sector plays a critical role in enabling economic activity and infrastructure development, while also contributing to emissions across multiple touchpoints. For transport, we have an ambition to support alignment with the UAE's Transport NDC , and the national Net Zero 2050 commitmen. Our goal in Transportation is to support the transition to cleaner mobility and logistics systems while reducing reliance on fossil fuels. We will prioritise engagement with clients to accelerate electrification of fleets, promote modal shifts from road to lower-carbon alternatives, and expand investment in charging, refuelling, and bunkering infrastructure. We also aim to integrate carbon intensity metrics more systematically into sector evaluations, ensuring that lending and financing decisions support long-term transition alignment. At the same time, we recognise the importance of logistics optimisation and smart technologies in reducing overall transport demand, improving efficiency, and supporting resilience against fuel price volatility and regulatory tightening. Through these measures, we will work with clients to advance sustainable transport solutions that are consistent with the UAE's NDC commitments and the Group's Net Zero ambition.

Decarbonisation Levers:
To achieve our interim targets and our overarching Net Zero ambition, we will focus on the below sector-specific decarbonisation levers for the Transportation industry. These levers reflect both our financing priorities and our role in supporting clients and sectors in their transition journeys.

Transport:
- Engage with clients to promote modal shifts and electrification in transport fleets.
- Support policy-aligned investment through partnerships with public and private transport agencies.
- Integrate carbon intensity indicators into transport sector credit evaluation.
- Participate in initiatives promoting smart logistics, emissions tracking, and infrastructure upgrades.
- Track sector exposure trends to ensure alignment with low-carbon mobility strategies.
- Assess top clients specifically around their climate and transition risk.

Telecommunication

Overview:
With AED 42.9 billion in total funded exposure at end-2024, Transport, Storage and Communication represented approximately 4.27% of the Group's portfolio. Telecommunications emissions are driven primarily by the rapid expansion of data centres, mobile and fixed-line networks, and the broader digital infrastructure required to support cloud computing, streaming services, and the growing use of artificial intelligence. These developments have sharply increased demand for electricity, amplifying reliance on national grid decarbonisation pathways and raising exposure to energy price volatility.

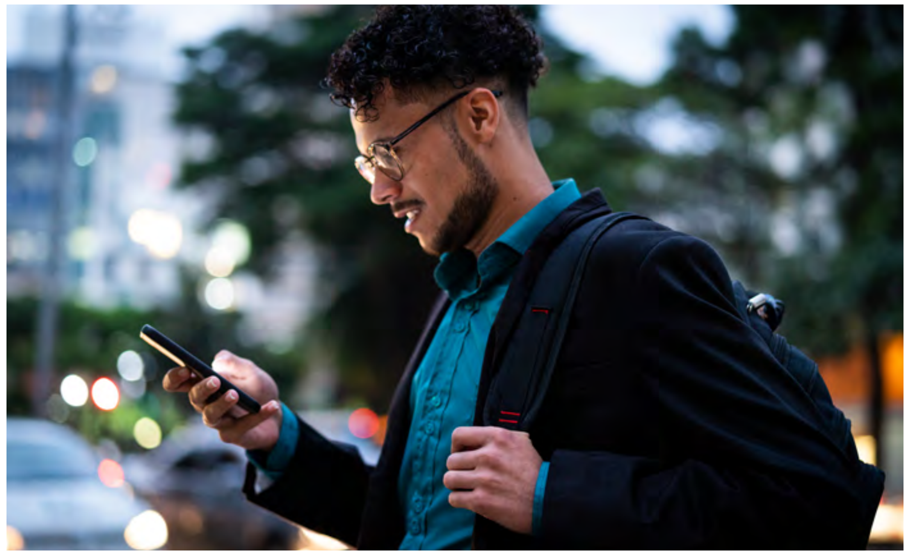
The sector also contributes indirectly to emissions through the manufacturing, distribution, and disposal of telecom equipment and digital devices. Embodied carbon in hardware and e-waste management represents additional transition and operational risks. At the same time, the sector has a unique enabling role across the economy through its ability to support advanced connectivity, digitalisation, and ICT solutions. These are essential for improving efficiency, optimising logistics, and supporting smart city and renewable integration. Its inclusion in the Group's Net Zero Pathway reflects both its growing exposure and its importance in enabling economy-wide transition.

Focus Area:
The Telecommunication sector plays a critical role in enabling economic activity and infrastructure development, while also contributing to emissions across multiple touchpoints. Communication infrastructure, including telecom networks and data centres, is aligned to the broader UAE Net Zero 2050 pathway, as emissions are expected to reduce in tandem with grid decarbonisation and improvements in energy efficiency. Our focus is on supporting the sector's long-term resilience and transition alignment through strategic engagement and targeted financing.

From a financing perspective, the Group recognises both the risks and opportunities within the sector. High energy consumption in data centres and network facilities raises transition risk, but demand for sustainable digital infrastructure creates a growing market for green finance. By supporting clients in expanding renewable energy integration, enhancing operational efficiency, and investing in next-generation technologies, the Group can align its financing activities with long-term climate resilience and support the digital backbone of the low-carbon economy.

Decarbonisation Levers:
To achieve our interim targets and our overarching Net Zero ambition, we will focus on the below sector-specific decarbonisation levers for the Telecommunication sector. These levers reflect both our financing priorities and our role in supporting clients and sectors in their transition journeys.

- Engage with clients in telecom and data infrastructure to improve energy efficiency of networks and data centers, with emphasis on high-efficiency cooling, smart energy management, and modular system design.
- Encourage and finance adoption of renewable energy in operations, and data centers.
- Support investments in next-generation digital infrastructure with a focus on reducing lifecycle emissions and embedding low-carbon standards.
- Strengthen sector resilience by supporting clients in developing climate adaptation measures, including enhanced cooling systems to withstand higher ambient temperatures and improved supply chain transparency.



5.5 Implementation Plan and Next Steps

The Group is committed to embedding net zero principles across our business operations, financing activities, and risk management practices. Achieving this requires a structured, phased approach that integrates climate considerations into our governance frameworks, investment decisions, and engagement with customers. Our strategy aims to support alignment with global best practices, while remaining responsive to the UAE's Net Zero 2050 Strategy and NDCs.

The transition to net zero is complex, requiring coordinated action across multiple areas. As part of this commitment, the Group will continue to evolve its approach, including periodically refreshing and enhancing our sectoral roadmap. This works to ensure that our transition planning remains practical, data-driven, and aligned with both international benchmarks and regional economic priorities.

Figure 7

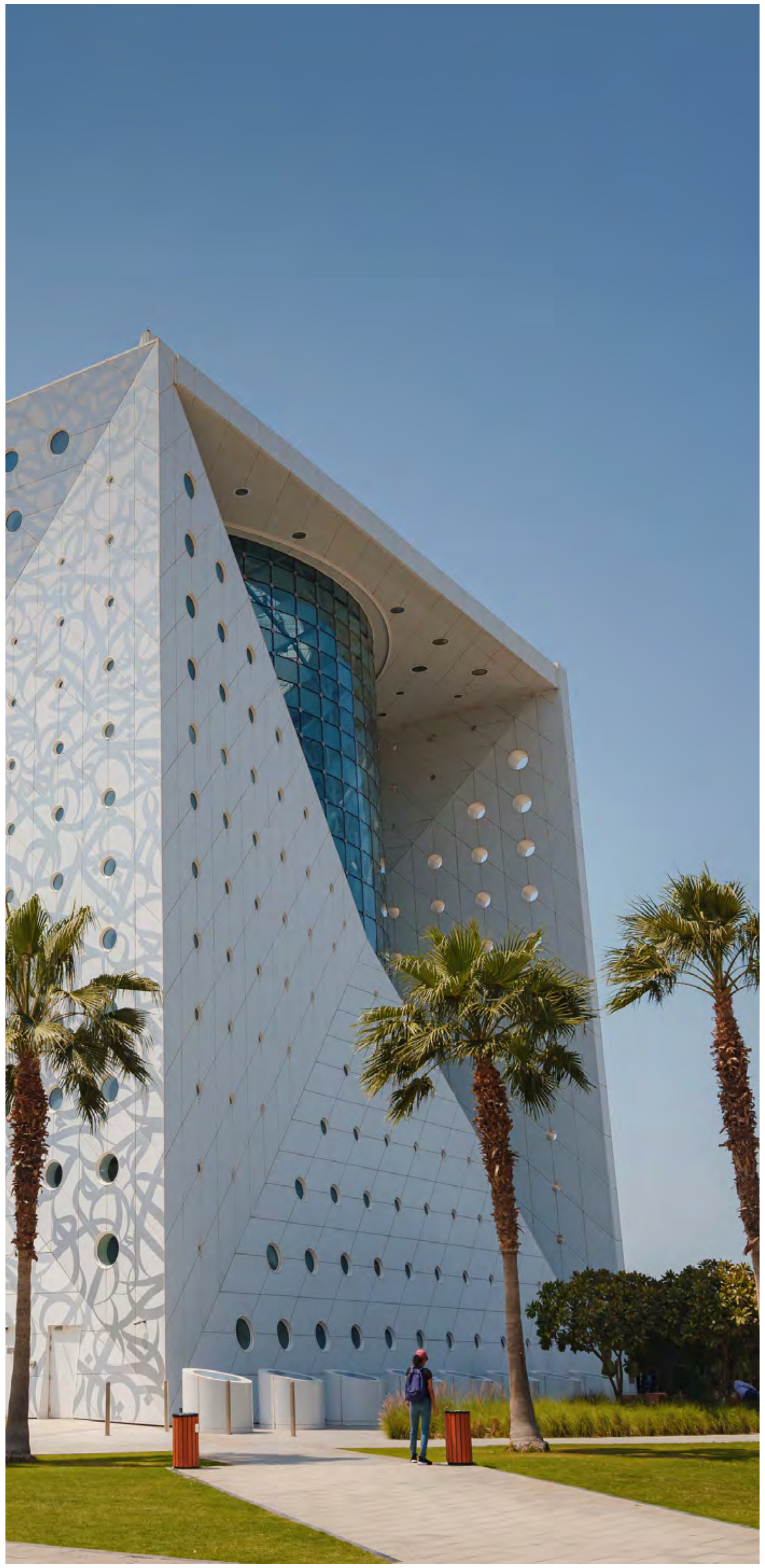
Implementation Plan and Next Steps

	2026	2027	2028	2029	2030
Measure Financed Emissions Measurement	Establish intensity-based methodology to measure emissions				
	Expand client coverage & embed emissions tracking				
	Improve PCAF scores & refine methodologies				
		Increase automation in the calculation process			
		Reduce reliance on proxies			
			Fully integrate financed emissions into risk & reporting		
Integrate Net Zero into Governance, Finance. Risk & Planning	Further embed climate criteria into sector policies, credit assessments and risk appetite				
	Further incorporate Net Zero into financial planning and analysis				
	Progressively enhance scenario analysis and stress testing				
				Fully integrate climate and nature metrics into capital planning and financial strategy	
			Net zero fully embedded into risk management, governance and financial planning		
Engage Client Engagement & Transition Support	Intensive engagement with high-emission and hard-to-abate sectors', roll out sectoral insights and advisory				
	Support SMEs and mid-market clients with products /tools for transition readiness				
	Encourage and track adoption of credit client transition plans, aligned with NDCs and global pathways				
				Partner on transition-linked innovations	
				Key clients in progress of developing or aligned to netzero-consistent pathways	
Scale Sustainable Finance & Innovation	Scale green, social, transition and sustainability-liked financing. Hit USD $30 billion sustainable finance target				
	Develop and roll out transition products (transition loans, blended structures, securitisation): expand partnerships with multilaterals and DFIs.				
				Deepen innovation and large-scale mobilisation of transition finance	
Assess Transition Assessment & Transparency	Launch annual transition assessment for key clients				
	Perform nature transition assessment				
	Enhance disclosure against relevant standards; benchmark progress against peers				
	Refine reporting and data collection methodologies and reporting depth				

Strengthening Financed Emissions Measurement
Improving the visibility and accuracy of our financed emissions profile will be pursued through a structured three-year roadmap that reflects both the step-change expected from CBUAE's climate-related disclosure requirements and our commitment to deeper client engagement.

In 2026, our focus will be on preparing for the regulatory shift by embedding financed emissions metrics into client onboarding, KYC, and monitoring systems so that actual data can flow seamlessly once disclosure becomes mandatory. At this stage, proxies and benchmarks will still be applied, but with a clear transition plan to replace them as client-reported figures become available. Further to this, we aim to establish a robust, intensity-based methodology that measures and manages emissions efficiency of our financing activities, and to set sector-level targets based on the direction of national climate goals and evolving composition of our portfolio.

By 2027, as CBUAE rules take effect, we expect a marked improvement in client-level disclosures, enabling us to reduce reliance on estimates and materially improve PCAF data quality scores. Alongside this regulatory alignment, we will expand our client engagement programme, with ESG specialists working directly with businesses, particularly in hard-to-abate sectors, to interpret requirements, build capacity, and support credible transition planning. By 2028, with more standardised and reliable disclosures, actual emissions data will be fully integrated into our risk frameworks, credit decisioning, and portfolio allocation processes.



This will ensure a tighter link between emissions intensity, risk appetite, and capital deployment, strengthening the robustness of both our financed-emissions reporting and our strategic decision-making.

Looking ahead, this dual focus on compliance and engagement will allow us to reach full portfolio coverage and high-quality disclosure by 2030, supported by automation and continuous alignment with both CBUAE requirements and evolving international standards.

Deepening Client Engagement and Transition Support
The Group recognises that its own net zero progress is closely linked to the ability of its clients to decarbonise. Dedicated sector and ESG specialists will intensify engagement with high-emission and hard-to-abate industries, providing advisory support, sustainable finance solutions, and sectoral transition insights tailored to their business models. At the same time, the Group will encourage adoption of credible transition plans aligned with national NDCs and global benchmarks, while extending support through practical tools and tailored products that enable them to begin or further their transition journey.

Integrating Net Zero into Risk, Finance, and Governance Frameworks
Ensuring that climate ambition is embedded into the Group's governance, finance and risk structures is essential to building long-term resilience. We will work to incorporate net zero considerations into credit assessment criteria, and risk appetite statements, with oversight provided by Board-level committees and Management bodies. Regular reviews of sectoral exposures, combined with enhanced scenario analysis and climate stress testing, will help the Group anticipate transition and physical risks and inform capital allocation and risk management decisions.

Further to this, the Group will work to further incorporate Net Zero into Financial planning and analysis, to align capital allocation, forecasting, and performance management with long-term climate targets and transition pathways.

Continuing to Scale Sustainable Finance and Innovation
The mobilisation of capital is central to achieving a credible transition. Building on the Sustainable Finance Framework, the Group will continue to grow its sustainable finance portfolio by expanding green, social, and sustainability-linked instruments while developing new solutions such as transition loans, blended finance structures, and green securitisation. These efforts will be guided by the Group's sustainable finance commitments and regional initiatives with strategic partnerships with multilaterals, DFIs, and peer institutions playing a critical role in channelling capital to priority transition areas.

Enhancing Transparency and External Visibility
The Group recognises that transparency is essential to accountability and stakeholder trust. We will continue to report progress in line with IFRS S1/S2, PRB and other relevant standards, while ensuring that disclosures remain consistent with regulatory expectations across the UAE and our international markets. Further to this, we will periodically review and update our net zero plan. Reporting will capture our financed emissions trajectory, progress against sectoral pathways, and integration of climate-related risk into governance and decision-making.

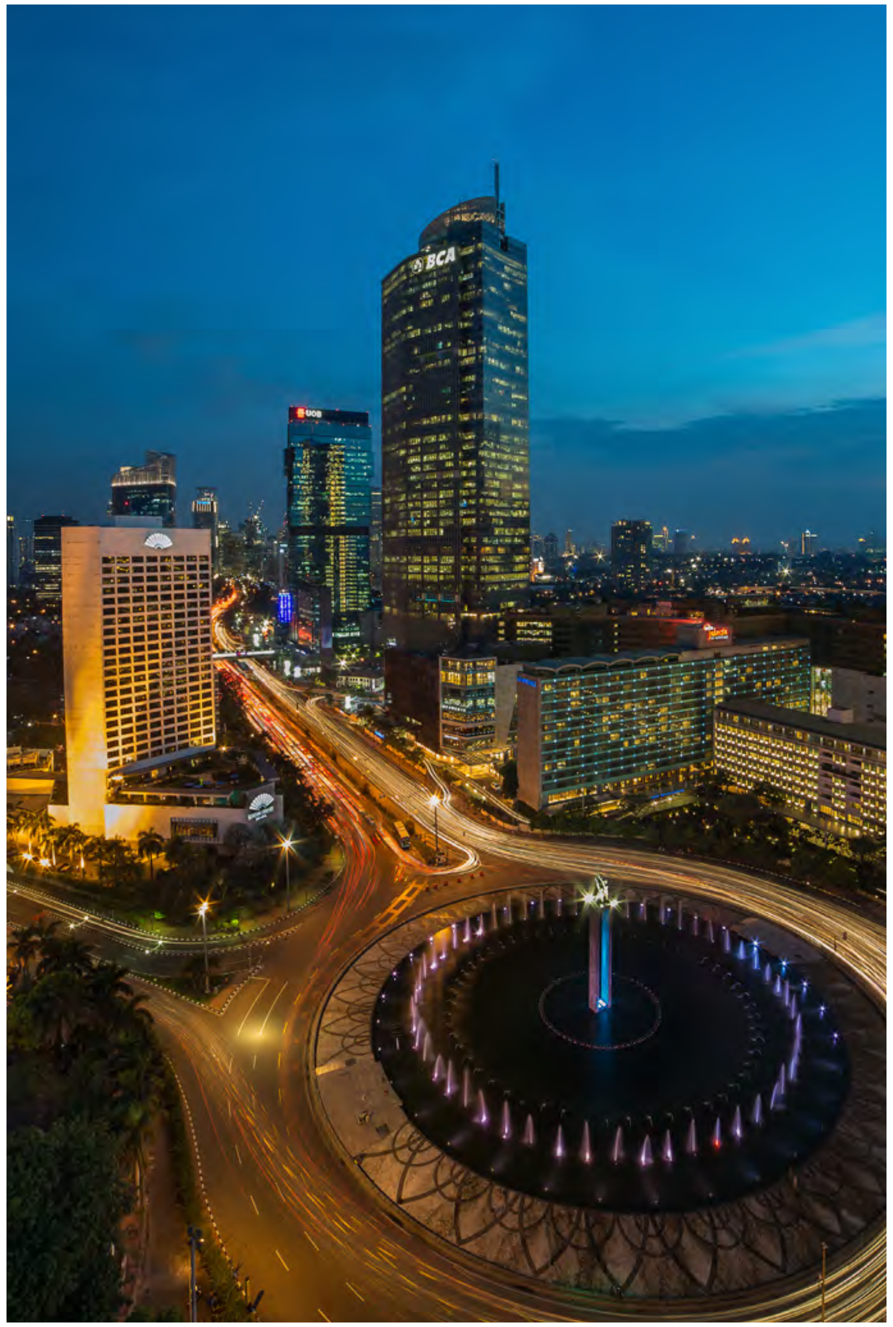
In 2025 our disclosures will extend beyond climate to cover nature, biodiversity and other sustainability-related risks and opportunities. As early adopters of the Taskforce for Nature Related Financial Disclosures, in 2025 our annual report will expand to incorporate TNFD requirements. This reflects a recognition that climate and nature risks are deeply linked and that a comprehensive approach is required to manage long-term environmental and financial resilience.

By progressively enhancing both the scope and depth of disclosure, the Group aims to provide stakeholders with a clear view of how it is managing transition, physical and nature-related risks, while aligning its strategy with evolving market practice and scientific understanding.

Transition Assessment
The Group will undertake an annual transition assessment of key clients in sectors that are most material to our financed emissions profile. This review will evaluate the credibility of client transition plans, alignment with national NDCs and global net zero commitments, and exposure to policy, technology, and market shifts. Where client data is limited, we will apply proxies and benchmarks, with methodologies refined over time as disclosure improves. The assessment will provide insights into sectoral and client-level transition readiness, informing portfolio management, risk appetite setting and targeted engagement. Outcomes will also guide the development of sustainable finance solutions to support clients in strengthening their transition strategies and ensuring long-term resilience.

Figure 8
Transition Assessment

1. Identify key clients material to net zero targets
2. Evaluate client transition plans
3. Assign rating based on evaluation
4. Conduct analysis and develop action plans
5. Action plans agreed by Sustainable Finance Commitee
6. Refresh Net Zero data



5.6 Transition and Investment Challenges

Achieving the sectoral decarbonisation pathways set out in the NZTP will require disciplined management of transition risk. While our pathways identify the technologies, levers and milestones needed, a range of financial, operational and market barriers can slow or constrain delivery.

A key challenge lies in the uneven policy and regulatory environment across our markets. The timing, scope and enforcement of climate-related standards, carbon pricing, and incentives remain inconsistent, making it difficult for clients to commit to large-scale investments with long payback periods. In some sectors, enabling infrastructure such as grid connections, charging or refuelling networks, and low-carbon supply chains is still developing, which limits the speed at which new technologies can be deployed. The Group will strive to support our clients in meeting the UAE's objectives ahead of their local jurisdiction's commitments.

Technology maturity is another critical factor. While certain solutions are commercially viable today—such as utility-scale renewables, energy efficiency measures, and green building technologies—others remain at earlier stages of development. Sectors such as heavy industry, shipping, and long-haul transport depend on solutions like hydrogen, CCUS and low-carbon fuels, where costs remain high, and scalability is uncertain. This creates both investment risk and timing challenges for alignment with our NZTP pathways.

The economics of transition investments are often constrained by high upfront capital requirements, evolving operating costs, and, in some cases, a lack of clear demand signals. This is compounded by supply chain constraints, including the availability of skilled labour, critical raw materials, and specialised equipment. Financing decisions are also affected by data quality and disclosure gaps, particularly in sectors where asset-level emissions data is incomplete or inconsistent, making it harder to assess alignment with our pathways.

Client ability, readiness and willingness varies significantly across sectors. While some clients already have robust transition plans with defined capex allocations and governance oversight, others are still in the early stages of assessing their exposure and opportunities. This variability increases delivery risk, especially in sectors where the pace of change must accelerate to meet our NZTP ambition. We also recognise the importance of managing just transition considerations, ensuring that social and workforce impacts are addressed alongside environmental goals.

Finally, physical climate risks present an additional layer of complexity. Acute events such as floods, storms, and heatwaves, as well as chronic risks like rising temperatures and water scarcity, can alter the economics of projects, damage assets, and affect collateral values.

These challenges do not alter our ambition, but they require a measured and selective approach to financing. Capital will be prioritised for sectors and clients with credible, near-term milestones, supported by targeted structuring, performance-linked covenants, and enhanced data requirements. Our sectoral pathways and appetites will continue to be reviewed and refined over time, reflecting changes in market conditions, technology readiness, policy developments, and client progress. Updated positions will be published in future NZTP reports to ensure transparency and accountability.

Sector	Sector-Specific Challenges
Agriculture	Land-use change and biodiversity impacts; deforestation, methane abatement at farm level; traceability challenges; financing smallholder transition.
Oil & Gas	Verification of methane abatement; uncertainty in CCUS and process-heat solutions; commodity price volatility; stranded asset risks; decommissioning liabilities.
Mining & quarrying	Mine closure liabilities; high energy and water intensity; tailings and waste management; social licence to operate; exposure to commodity cycles.
Manufacturing	Decarbonising high-temperature heat; process redesign costs; downtime for retooling; access to low-carbon energy and feedstocks; supply chain disruption risks.
Utilities	Grid connection and permitting delays; intermittency and storage economics; water scarcity and energy/water trade-offs; resilience to extreme weather.
Construction	Embodied carbon in materials; high cost and limited availability of low-carbon substitutes; waste and pollution control requirements; split incentives in leased assets; retrofit disruption; performance-gap risk between design and operation; adaptation costs for climate resilience.
Transportation	Fleet turnover rates and high upfront costs of zero-emission vehicles; charging, bunkering and refuelling infrastructure gaps; long asset lifetimes and lock-in risk; regulatory divergence across regions; need for modal shifts (i.e., road to rail/public transport).
Telecommunication	High energy intensity of digital infrastructure; growing data traffic and cooling demand; reliance on renewable PPAs and grid decarbonisation; embodied carbon in devices and network equipment; circularity and e-waste management.

Transition Risk Appetite

As part of the NZTP, Emirates NBD's transition risk appetite defines the level and nature of sectoral transition risk we are prepared to accept. It is aligned with our ESR commitments, reflecting our responsibility to support a credible, just transition while managing related credit, market, reputational, and compliance risks. Appetite levels are applied through our financing/lending and investment decisions, portfolio monitoring, and capital allocation processes, and will be refined over time as pathways, policies, and markets evolve.

This approach ensures that:

- Financing decisions support credible sectoral transition in line with our NZTP pathways.
- ESR assessments, including enhanced due diligence for large corporate exposures, are integrated into credit decision-making.
- Restrictions apply to activities inconsistent with sector-level decarbonisation objectives.

Our transition risk appetite covers the full spectrum of transition risks, including policy and regulatory changes, market shifts, technology risks, reputational considerations, and legal and compliance obligations.

Overarching Statement
We will finance activities that credibly support a sector's transition to a low-carbon economy in line with our NZTP pathways. We will not finance activities that are materially misaligned with these pathways and present unacceptable transition, reputational, or other risk exposures.

For transitional activities, we will only finance where there is a credible, time-bound plan to achieve alignment.
Financing decisions will be made in line with and as defined within our ESR framework. High-risk, material, or deviating cases will be escalated to relevant committees for approvals / clearance or necessary actions, as applicable.

Sectoral Risk Appetite Statements

- **Agriculture:** We will support sustainable agricultural practices that enhance biodiversity and reduce emissions. Activities linked to illegal deforestation, unmanaged land-use change, or unsustainable practices will not be financed. Other activities with material environmental risks will be subject to detailed review to ensure credible mitigation and adaptation measures are in place.
- **Oil & Gas:** We will selectively support activities that reduce operational emissions, deploy abatement technologies, or are aligned to credible transition pathways. New high-carbon fossil fuel extraction without credible and aligned decarbonisation measures will not be supported. Other activities will be subject to enhanced due diligence to ensure consistency with transition objectives.
- **Mining & Quarrying:** We will support activities that supply transition-critical minerals, provided they are undertaken in line with recognised environmental and social standards. Higher-impact mining and quarrying projects will be subject to enhanced due diligence and will only be considered where robust mitigation and adaptation measures are demonstrated.
- **Manufacturing:** We will support efficiency upgrades, low-carbon processes, circular economy initiatives, and alternative fuel adoption. High-intensity or emission-heavy manufacturing activities will be subject to detailed review and will only be supported where credible transition plans are demonstrated.
- **Utilities:** We will support renewable energy, grid modernisation, storage, and water efficiency projects aligned with the NZTP. Unabated coal-fired generation will not be supported. Other high-carbon generation activities will be considered only where credible transition or abatement measures are in place and will be subject to enhanced due diligence.
- **Construction:** We will support developments, acquisitions, and retrofits that utilise low-carbon materials, meet recognised green building standards, or demonstrate credible adaptation measures. New developments without such measures will be subject to enhanced due diligence. Projects with high embodied carbon will require robust mitigation measures to proceed.
- **Transportation:** We will support low-emission transport solutions, fleet efficiency, and resilient infrastructure. High-carbon fleet expansion or related infrastructure projects will be subject to detailed review and will only be supported where credible transition measures are demonstrated.
- **Telecommunication:** We will support the expansion of digital infrastructure where it enhances connectivity, efficiency, and resilience. Activities will be expected to demonstrate credible energy efficiency measures and alignment with long-term transition objectives.

Application of the Risk Appetite
This risk appetite is implemented through enhanced due diligence for higher-risk activities, sustainability-linked terms in financing agreements, and ongoing monitoring to ensure alignment over time.

Mapping Transition Risk Appetite by Sector to our Decarbonisation Pathway
To navigate the transition to net zero, we must make informed, risk-aware choices about where and how we allocate capital. The matrix below maps each sector based on two critical dimensions:

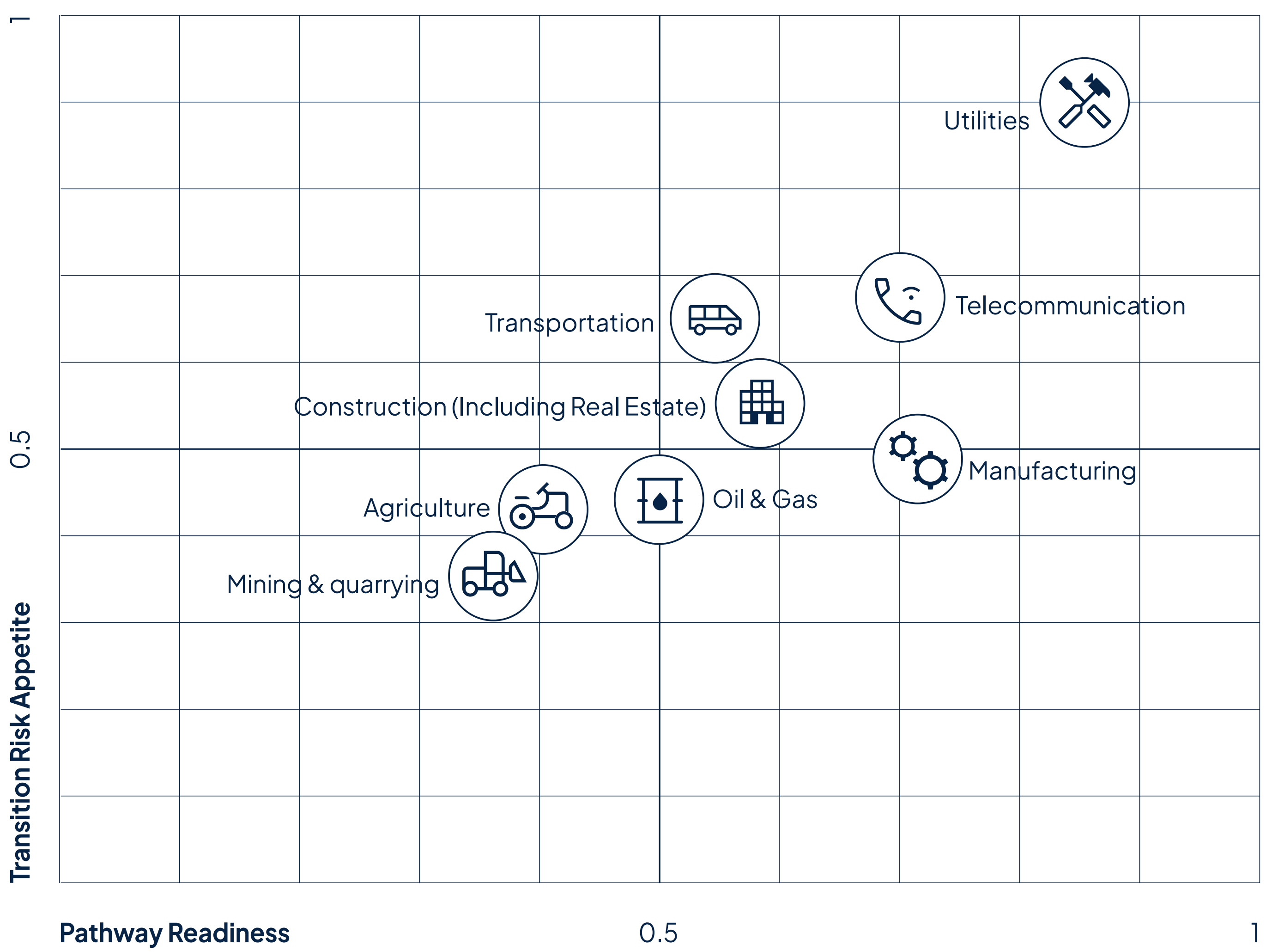
- **Pathway Readiness** – How clear, credible, and actionable the transition is for the sector, based on policy support, technology availability, and market signals.
- **Transition Risk Appetite** – Our willingness to finance activity in the sector, based on its emissions profile, our defined ESR policy, alignment with national and global climate goals, and risk exposure.

Together, these dimensions form a sector compass that helps guide our decision-making. Sectors in the upper-right represent opportunities for scaling climate-aligned finance. Those in the lower quadrants require enhanced scrutiny, greater selectivity, or targeted engagement to support credible transition.

This assessment is aligned to our Emirates NBD ESR commitments, and our broader NZTP. It is dynamic by design, and will evolve as sector pathways strengthen, policies shift, and new technologies emerge.

Figure 9

Transition Readiness



5.7 Additional Information and Assumptions

This report presents an assessment of the Group's net zero strategy, covering both our financed emissions reduction commitments and the decarbonisation of our own operations and value chain. It leverages the best available data, methodologies, and climate scenarios at the time of publication. However, given the inherent complexities of ESG data, forward-looking projections, and transition modelling, it is important to acknowledge the assumptions and limitations that underpin the findings.

Many aspects of climate risk assessment, financed emissions calculation, and operational decarbonisation are dynamic and evolving, influenced by regulatory changes, technological advancements, and market conditions. As such, this report should be interpreted with an understanding of the inherent uncertainties and potential need for future refinements as data quality improves, methodologies mature, and regulatory requirements evolve.

Key Risks and Uncertainties
While we are committed to achieving net zero financed emissions, we acknowledge the risks and challenges that may impact the transition:

- **Economic and Business Growth Considerations** - We must balance climate action with continued financial and economic stability, ensuring that businesses have access to capital as they transition.
- **Inflation and Market Volatility** - Changes in inflation and economic cycles may impact businesses' ability to finance low-carbon investments.
- **Data and Methodology Gaps** - Measuring financed emissions requires robust data collection from clients, which is still evolving across markets and sectors.
- **Regulatory and Policy Changes** - Governments may update climate policies, carbon pricing mechanisms, and reporting requirements, requiring us to adapt our approach over time.
- **Technology Uncertainty** - The availability, scalability, and affordability of breakthrough technologies (e.g., hydrogen, carbon capture) will influence how different sectors decarbonise.

To account for these uncertainties, we will regularly update our assumptions, ensuring that our financing decisions remain aligned with the latest climate and economic trends. Further to this, we continuously assess these risks and integrate them into our scenario planning and strategic decision-making to ensure we remain agile and adaptive in our transition.

Forward-Looking Nature of ESG Data and Metrics
The ESG data and transition pathways outlined in this report are forward-looking by nature. They rely on climate scenarios, industry projections, and evolving policy commitments, rather than static, historically validated datasets. The financial sector's approach to measuring and managing climate-related risks and opportunities continues to evolve, with improvements expected over time.

While every effort is made to ensure robustness and accuracy, these forward-looking statements may be subject to future revisions as scientific insights, regulatory frameworks, and economic conditions change. As a result, the conclusions drawn in this report represent a point-in-time assessment that will need to be updated periodically to reflect new data, policy developments, and industry advancements.

Range of Inputs and Data Sources
The analysis presented in this report is based on a combination of internal and external data sources, industry benchmarks, third-party ESG ratings, and climate modelling scenarios. These inputs come from a variety of sources, including:

- **Internal Transition Risk Assessment**, conducted on an annual basis, will reflect our specific client portfolios and industries, enabling more precise and tailored inputs into the analysis.
- **Publicly disclosed corporate emissions data** (where available) for assessing both financed and operational emissions.
- **Third-party climate risk assessment tools and ESG ratings**, which may have differing assumptions and coverage gaps.
- **Sectoral decarbonisation**

pathways and global net zero roadmaps
- **NDCs from the UAE and other countries where we operate**, outlining government commitments to reducing emissions.

Given the broad range of inputs, there are inevitable data gaps and variabilities. In cases where sector-specific or regional data is limited, proxies, estimates, or extrapolations have been used. While these methodologies help bridge gaps, they introduce a degree of uncertainty that must be considered when interpreting results.

Evolving Methodologies and Maturity of Models
Climate risk assessment, financed emissions calculations, and operational decarbonisation modelling are rapidly evolving, with many methodologies still undergoing refinement and standardisation. While significant progress has been made in recent years, particularly with the adoption of PCAF, some elements of net zero modelling remain in development.

Key areas of ongoing refinement include:

- **Sectoral transition pathways**, which continue to evolve as technological advancements, regulatory shifts, and policy commitments change.
- **Operational emissions reduction methodologies**, particularly around Scope 3 emissions, which are often difficult to measure accurately due to reliance on supplier and value chain data.
- **Data collection and emissions measurement practices**, which vary across regions and industries, requiring ongoing improvements in standardisation.
- **Forward-looking climate risk models**, which remain subject to uncertainty, particularly regarding long-term policy and market shifts.

Over time, we expect that enhanced disclosure requirements, better data availability, and refined modelling techniques will improve the accuracy and comparability of both our financed and operational emissions assessments.

Data Quality and Client-Provided Inputs
Assessing financed emissions, operational carbon footprints, and transition risks requires significant reliance on external data sources, including client-reported emissions disclosures and supplier data. However, there are significant challenges associated with data completeness, accuracy, and consistency across different industries and geographies.

Some key challenges include:

- **Inconsistencies in corporate climate disclosures**, as different companies may report emissions data using different accounting frameworks or methodologies.
- **Limited availability of Scope 3 emissions data**, particularly for supply chain and product lifecycle emissions, which are often estimated rather than directly measured.
- **Reliance on third-party ESG ratings and sustainability reports**, which may have differing assumptions or coverage gaps.
- **Use of Proxy Data**, leading to reduced accuracy in emissions reporting due to reliance on industry averages or generalised factors when primary emissions data is unavailable. This impacts the precision and reliability of assessments.

Given these challenges, data quality remains a key limitation in both financed and operational emissions assessments.
Where direct emissions data is unavailable, assumptions, industry averages, and estimated emissions factors have been used. As corporate disclosure practices improve, we anticipate greater accuracy and consistency in future assessments.

Future Updates and Refinements
Given the evolving nature of climate finance, operational sustainability reporting standards, and transition risk assessment methodologies, this report and its assumptions may need to be updated periodically. Key drivers of future updates include:

- Changes in global and national climate policies, particularly UAE climate commitments and regulatory developments impacting both financed and operational emissions.
- Improved corporate emissions disclosure, as more companies adopt standardised reporting frameworks such as the ISSB and TCFD.
- Advancements in net zero methodologies, particularly improvements in PCAF-aligned financed emissions accounting, operational emissions tracking, and climate scenario analysis.
- Refinements in sectoral transition pathways, reflecting updated IEA projections, market shifts, and emerging technologies.

The Group remains committed to continuous improvement in its approach to net zero strategy, financed emissions measurement, operational decarbonisation, and risk assessment. We will continue to refine our assumptions and methodologies on an ongoing basis to ensure that our approach remains aligned with best practices, regulatory requirements, and scientific advancements.
This NZTP acknowledges these uncertainties and assumptions, while aiming to provide a transparent, structured, and data-driven approach to achieving net zero across our financed emissions, operations, and value chain.

Risk Considerations

Delivering the NZTP will inevitably reshape the Group's risk profile, altering both the drivers and magnitude of traditional financial and non-financial risks. Transition and physical climate factors can accelerate, delay, or disrupt change in key sectors, influencing market conditions, client performance, and asset values.

Our methodology for assessing transition risk impacts begins with identifying the relevant transition drivers for each risk type, such as policy changes, technology shifts, market re-pricing, evolving customer preferences, or reputational factors. We then determine the key transmission channels through which these drivers could influence our exposures, valuations, or business operations. Finally, we assess the potential severity and likelihood of these impacts using a combination of scenario analysis, stress testing, sectoral appetite scoring, and expert judgement. This integrated approach ensures that our risk management remains both forward-looking and grounded in credible transition pathways.

Credit risk is one of the most immediate channels through which transition dynamics can affect our portfolio. Clients in higher-emitting sectors may face revenue pressures from carbon pricing, regulatory restrictions, and technological disruption, while collateral values may decline if assets are inefficient or vulnerable to physical climate risks. We manage these exposures through careful counterparty assessment, performance-linked covenants, and, where necessary, phased reduction of exposures to activities inconsistent with our transition objectives.

Market risk can arise when policy announcements, carbon price fluctuations, or technological breakthroughs trigger rapid re-pricing of carbon-intensive assets, or when liquidity becomes concentrated in "green" and transition-aligned markets. We incorporate these dynamics into our stress testing and scenario analysis and diversify our exposures to reduce sensitivity to abrupt shifts in market sentiment.

Liquidity and funding risk may be affected by changing investor preferences, with stronger demand for issuers that demonstrate credible transition plans and increasing scrutiny of collateral linked to high-emission sectors. We mitigate these risks through conservative liquidity buffers, diversified funding sources, and the ongoing development of sustainable finance instruments to ensure access to resilient funding channels.

Environmental and social risks are central to transition considerations, encompassing emissions intensity, biodiversity impacts, resource use, and social consequences of change. These can crystallise as legal liabilities, regulatory sanctions, or reputational harm. We embed environmental and social assessments into our credit decision processes, require mitigation measures for higher-impact activities, and ensure that financed projects are aligned with the relevant sectoral pathway.

Country risk reflects the influence of national climate policy credibility, fiscal resilience, energy mix, and exposure to physical climate hazards. We assess each market's policy alignment, transition readiness, and potential for disruption, adapting our financing structures, pricing, and covenants to local conditions.

Reputational risk is amplified in the transition space, where perceived misalignment between our commitments and our financing decisions can quickly erode trust. We manage this by maintaining transparent sectoral appetites, conducting rigorous reviews of sensitive transactions, and ensuring public disclosures are consistent with our actions.

Conduct risk can emerge where sustainability-linked products are specified incorrectly, marketed without sufficient clarity, or fail to deliver the outcomes claimed. We mitigate this through strong product governance, alignment with recognised market standards, and training to ensure consistent, accurate communications.

Operational risk is shaped by the integration of new climate-related data, processes, and systems, as well as reliance on third-party providers. We address these challenges through robust change governance, data quality controls, and supplier oversight.

Compliance risk arises from the rapidly evolving regulatory landscape, including disclosure requirements, taxonomy rules, and labelling standards across jurisdictions. We actively monitor regulatory developments, integrate compliance review into all relevant processes, and ensure our sustainability claims are supported by verifiable evidence.

Legal risk can arise from contractual disputes, environmental liabilities, or alleged misrepresentation of sustainability credentials. We mitigate this through robust contractual provisions, pre-finance legal review, and monitoring of post-transaction performance against agreed sustainability criteria, where required.
Concentration risk occurs when exposures are clustered in sectors, geographies, or clients particularly vulnerable to transition shocks. We manage this through diversification, and active rebalancing towards aligned activities in line with our NZTP sectoral pathways.

These risks are interlinked, market re-pricing can affect funding conditions, environmental and social impacts can trigger reputational or legal consequences, and model limitations can influence appetite calibration. By embedding transition considerations into our risk governance, from Board oversight to portfolio-level monitoring, we ensure that these interconnected risks are managed holistically and in alignment with our long-term transition objectives.

These risk considerations are deeply linked to our sectoral appetites, the same transition drivers that influence our appetite also shape how each risk type is monitored and managed. Together, they ensure that the NZTP is delivered within a controlled and transparent risk management framework.

6. Metrics and Targets:

TPT Framework – Banks Sector Guidance

Guiding Principle	Element	Disclosure Sub-Elements	Mapping to Group Transition Plan
Ambition	Foundation	1.1 Strategic Ambition	1. Our Foundational Values 4. Net Zero Ambition
		1.2 Business Model and Value Chain	1. Our Foundational Values 4. Net Zero Ambition
		1.3 Key assumptions and external factors	4.7 Additional Information and Assumptions
	Implementation Strategy	2.1 Business Operations	1. Our Foundational Values 4. Net Zero Ambition
		2.2 Products and services	1. Our Foundational Values 4. Net Zero Ambition
		2.3 Policies and conditions	4. Net Zero Ambition
Action		2.4 Financial Planning	5. Transition at the Group
	Engagement Strategy	3.1 Engagement with value chain	4. Net Zero Ambition
		3.2 Engagement with industry	4. Net Zero Ambition
		3.3 Engagement with government, public sector, and civil society	4. Net Zero Ambition
Accountability	Metrics and Targets	4.1 Governance, engagement, business and operational metrics and targets	3. Governance Framework
		4.2 Financial metrics and targets	1. Our Foundational Values 4. Net Zero Ambition
		4.3 GHG emissions metrics and targets	4. Net Zero Ambition
		4.4 Carbon Credits	4. Net Zero Ambition
	Governance	5.1 Boards oversight and reporting	3.2 Board Oversight and Reporting
		5.2 Management roles, responsibility, and accountability	3.3 Managements roles, responsibilities, and accountability
		5.3 Culture	3.4 Culture
		5.4 Incentives and remuneration	3.5 Incentives and remuneration
		5.5 Skills, competencies, and training	3.6 Skills, competencies, and training

7. Appendix

7.1 Abbreviations

Abbreviations	Full Form
AED	Dirham Currency
AM	Asset Management
AML	Anti Money Laundering
BCIC	Board Credit and Investment Committee
BNRESGC	Board Nomination, Remuneration and Environmental Social Governance Committee
BOD	Board of Directors
BRC	Board Risk Committee
CBUAE	Central Bank of the United Arab Emirates
CDA	Community Development Authority
EmCap	Emirates NBD Capital
Emirates NBD, the Group, the Group	Emirates NBD Bank P.J.S.C. and all its subsidiaries including international offices
ERM	Enterprise Risk Management
ESG	Environmental, Social and Governance
ESR	Environmental and Social Risk Framework
EXCO	Executive Committee
FY 2024	Financial Year for January 2024 - December 2024
GCEO	Group Chief Executive Officer
GCRO	Group Chief Risk Officer
GCSO	Chief Sustainability Officer & Group Head of ESG
GHG	Green House Gas
GRC	Group Risk Committee
GRI	Global Reporting Initiative
Group MOC	Group Model Oversight Committee
ICAAP	Internal Capital Adequacy Assessment Process
IFRS	International Financial Reporting Standards
ISF	Information Security Forum
ISO	International Organisation for Standardisation
ISSB	International Sustainability Standards
KPIs	Board
KYC	Key Performance Indicators
LEED	Know Your Customer Leadership in Energy and Environmental Design
LMA	Loan Markets Association
MCC	Management Credit Committee
MENAT	Middle East, North Africa, and Türkiye
NDC	Nationally Determined Contributions
NGFS	Network for Greening the Financial System
NZ	Net Zero 2050
PCAF	Partnership for Carbon Accounting Financials
RI	Responsible Investment
SF	Sustainable Finance
SFF	Sustainable Finance Framework
SLL	Sustainability-Linked Loan
SPOCs	Single Point of Contact
SPTs	Sustainability Performance Targets
TCFD	Task Force on Climate-related Financial Disclosures
TNFD	Task Force on Nature-related Financial Disclosures

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