

# KEY STATEMENT DISCLOSURE -DIB POLICIES

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#### 1. Introduction

Dubai Islamic Bank ("DIB", "The Bank") and its subsidiaries are committed to conducting business in accordance with Sharia Principles and Accounting and Auditing Organisation for Islamic Financial Institutions ("AAIOFI") Standards, the highest ethical standards and related laws and regulations.

At Dubai Islamic Bank we believe that responsible business is good business. One of DIB's core principles is its commitment to conduct business that is transparent, prudent, and dependable. DIB believes we can build stronger teams, serve our customers better, have a positive impact on society, and manage our sustainability-related risks when we do the right thing.

Our dedication to responsible business means that matters impacting the trust of our customers and employees are taken very seriously. The standards of ethical and professional conduct outlined in this disclosure are critical to DIB's success as a progressive Islamic financial institution.

DIB is committed to the sustainable development of the UAE. We believe that we play an important role in leading by example, where we aim to be a role model in ethical practices and behaviors that ensure a positive outcome for our stakeholders.

# 2. Purpose

This document is not a stand-alone policy, but a consolidation of many DIB key policies. The purpose of this document is to disclose elements of the core policies and procedures forming the foundation of DIB's high standards of integrity.



# 3. Policy statements

# 3.1 Sustainability

At Dubai Islamic Bank (DIB), our commitment to sustainability is integral to our identity and operations. Guided by the principles of responsible business, we strive to harmonise our growth with the well-being of our teams, customers, society, and the environment. Aligned with the United Arab Emirates' sustainability priorities and the United Nations Sustainability Development Goals (SDGs), our holistic 2030 strategy aims for Net Zero emissions and endeavors to create long-term value for all stakeholders.

As a progressive Islamic financial institution, DIB is committed to the sustainable development of the UAE. We believe that we play an important role in leading by example, where we aim to be a role model in sustainable practices and behaviors that ensure a positive outcome for our stakeholders. As a bank we also have a responsibility and commitment towards financing a sustainable future, where we are embracing and driving sustainable finance solutions and empowering our customers and communities.

Our sustainability efforts are guided by dedicated committees, ensuring that sustainability is embedded in our strategic planning and operational execution. We are committed to engaging with our stakeholders, continuously improving our practices, and reporting our progress transparently.

As we move towards our goals, we remain dedicated to being a role model in sustainable practices within the Islamic banking sector and beyond. Our policy is not just a commitment to environmental stewardship but a pledge to contribute positively to our community and society at large, ensuring a sustainable future for generations to come.

At DIB, sustainability is not just a policy; it's our promise to our planet, people, and prosperity.

The Bank has made the following commitments related to Sustainability:

- **Embrace Diversity and Inclusion:** Cultivating a diverse and inclusive workforce to enhance innovation and job satisfaction.
- Enhance Employee Wellbeing: Fostering an environment where our employees and their families can thrive.
- **Drive Transparency and Disclosure:** Committing to transparency in our operations and disclosing our performance to build stakeholder confidence.
- **Operational Environmental Footprint:** Actively reducing our environmental impact and aiming for Net Zero emissions by 2030.



- **Champion Business Ethics and Customer Privacy:** Safeguarding our customers' data and providing a secure and fair banking environment.
- **Promote Financial Inclusion:** Ensuring access to affordable financial services for underrepresented segments of society.
- **Propel Sustainable Finance:** Financing sustainable solutions and supporting our clients in their journey towards a more sustainable and equitable future.
- **Embed Sustainability into Decision Making:** Integrating sustainability considerations into our risk management and decision-making processes.

For more information about DIB's Sustainability efforts thus far, please visit our dedicated webpage. Here you can access and download our annual Sustainability reports, Sustainable Finance Impact report, Sustainable Finance Framework, and more.

# 3.2 Anti-Bribery & Anti-Corruption (ABAC)

DIB's policy is never to offer, pay, request, solicit or receive bribes, or to facilitate, assist in or abet any offer or payment of bribes and to refuse any request to pay them. All directors, employees, and associated third parties are prohibited from:

- Offering, promising, giving, requesting, accepting, or suggesting a bribe;
- Soliciting or accepting a bribe to influence a decision, obtain unauthorised access to confidential information, commit or omit to do an act;
- Offering, promising, or transferring anything of value to a public official in order to influence or obtain/retain business or advantage for DIB;
- Using a third-party intermediary to facilitate or disguise the intentions of any activities like those mentioned above;
- Accepting unreported gifts from any party; and
- Dealing with vendors that do not have high standards for anti-bribery and anti-corruptions or are known to be involved in bribery and corruption.

DIB has adopted necessary preventative measures to avoid potential situations which could result in bribery and corruption. Accordingly, DIB strictly enforces disclosure of conflicts of interest, approval authority matrices, and multiple levels of controls for material transactions. Further, appropriate assessments are performed prior to engaging with third parties such as strategic vendors and outsourced service providers.



#### Governance

It is the responsibility of each and every director and employee to ensure compliance with the ABAC policy. DIB has established a whistleblowing infrastructure which is to be used by employees for reporting of incidents/suspicion related to bribery and corruption. Line managers / Department heads remain responsible to raise flags against any suspicious or actions which may lead to investigations related to bribery and corruption.

In the event of suspected incidents of bribery and corruption, department heads initiate preliminary investigations. The Fraud Investigation Unit is responsible for conducting investigations when assigned, and focus on reviewing root causes, and implementing necessary control enhancement to prevent recurrence of incidents.

#### Awareness and training

Employees are imparted with necessary training and awareness appropriate to their roles and responsibilities on anti-bribery and anti-corruption. DIB educates its new and existing employees on anti-bribery anti-corruption practices, discipline and controls on an on-going basis.

# 3.3 Conflicts of Interest

DIB has committed to conducting activities ethically and with integrity by putting in place a framework enabling all stakeholders to easily identify, prevent, or manage conflicts of interest. DIB's Conflict of Interest Policy applies to all employees, board members, consultants and contractors, subsidiaries and affiliates.

DIB seeks to avoid conflicts of interest and, where this is not reasonably possible, DIB is committed to appropriately managing conflicts of interest in a fair manner ensuring customers' and other stakeholders' interests are not harmed.

The Conflict of Interest Policy addresses potential sources of conflicts such as gifts & entertainment, related-party transactions, employment and activities outside of DIB, employment of relatives, abusive sales practices, insider trading, and personal financial dealings.



#### **3.4 Crime Prevention**

DIB is committed to prevent misuse of any of its products, services, and/or channels to launder money, finance terrorism related activities, and/or commit sanctions violations. The Bank pledges to prohibit corporate profit to take precedence over the duty to combat financial crime.

DIB's Anti Money Laundering (AML), Combating Financing of Terrorism (CFT), and Know Your Customer (KYC) Policy is in place to provide key standards for managing and mitigating financial crime risks, and ensure local and global regulatory compliance. The policy also addresses Proliferation Financing (CPF).

#### Governance

Policies governing AML/CFT, CPF and Sanctions Compliance are renewed annually and are approved by the Board. Policies establish governance through a three line of defense model. The bank has a dedicated Money Laundering Reporting Officer to oversee the program. At the Board level, the Board Risk Compliance and Governance Committee is responsible for policies and setting a strong tone from the top. The Compliance Committee meets regularly and is chaired by the GCEO.

An effective management reporting framework is implemented to give timely and actionable information to senior management for proactive risk mitigation. Policies are supported by automated screening and monitoring systems and associated investigation teams to help comply with the Sanctions, AML, and CFT requirements. Independent Compliance Monitoring is undertaken to provide assurance over the effectiveness of controls.

# **Risk-Based Approach**

The Bank deploys a risk-based approach for AML, CTF, and PF. The approach involves identifying, assessing, and understanding underlying risk using enterprise-wide assessment tool, and taking appropriate, proportionate mitigation measures based on the risk level identified.

Some key activities undertaken as part of the risk-based approach are:



# Know Your Customer (KYC)

Knowing the customer is the Bank's best defense to prevent exploitation for criminal activities. The basic steps of DIB's KYC process are:

#### Identification & Verification (ID&V)

The Bank is obliged to correctly identify customers using reliable, independent source documents. It is critical to determine the Ultimate Beneficial Owner or controlling person.

#### Customer Due Diligence (CDD)

Following a risk-based approach, the Bank follows a comprehensive CDD program that shall be undertaken prior to and during the business relationship.

Based on the assessed risk level, DIB can apply one of three levels of due diligence: Simplified Due Diligence (SDD), Customer Due Diligence (CDD), and Enhanced Due Diligence (EDD).

#### **Transaction Monitoring**

Utilising an Alert Risk Scoring mechanism, alerts requiring heightened attention are prioritised for review, investigation and reporting.

Similarly, a risk-based approach is applied for assigning lower thresholds to higher-risk segments to review and investigate such transactions thoroughly.

#### CFT Name Screening

A critical point of all three levels of due diligence is name screening. This process helps DIB to identify whether any of the individuals, related parties, or corporate clients they deal with are part of any local or international list, or are Politically Exposed Persons (PEPs). Name screening is formally conducted against databases of known or suspected terrorists issued by competent authorities.



#### Types of relationships requiring EDD

The bank risk rates customers utilising its comprehensive Customer Risk Assessment Methodology to identify i) Assessed Neutral or ii) Increased Risk customers. Enhanced due diligence is performed on all Increased Risk Customers consisting of increased scrutiny and documentation review during onboarding as well through the customer's relationship lifecycle. Types of increased risk customer relationships requiring EDD include but are not limited to:

- Politically Exposed Persons (PEPs)
- Real Estate and Precious Metals sector
- Issuers of prepaid card schemes and payment service providers
- Cash intensive businesses
- Money service businesses
- Charitable or Non-Profit Organisations
- Non-resident customers

Senior management approval is required to proceed with increased-risk customer relationships.

#### Training, Awareness, and Record Keeping

DIB implements comprehensive, mandatory Bank-wide and role-based training programs to ensure that employees are up to date in their understanding of AML/CFT & KYC risks.

DIB adheres to the statutory record keeping and retention per, which is at least five (5) years from a defined list of events.



#### 3.5 Whistleblowing

DIB is committed to maintaining a corporate governance framework based on a culture of openness and transparency. The Bank's whistleblowing mechanism is an integral component of this framework.

Employees play a central role in upholding DIB's core values, ethical standards and business principles. DIB's whistleblowing policy is designed to ensure that employees will not be seen as disloyal or be victimised when reporting cases of witnessed or suspected conduct in good faith. The policy aims to provide guidance on dealing with suspected or witnessed misconduct in an effective way, and encourage employees to come forward and report instances. DIB is committed to ensuring all reported cases are handled fairly and promptly.

#### What to report

Employees are encouraged to report suspected or actual cases of misconduct. Examples of misconduct include but are not limited to breaches of laws or regulations, violations of DIB's Code of Conduct, questionable accounting or auditing procedures, breach of customer confidentiality, harassment in the workplace, and endangerment of the health or safety of another person.

Misconduct likely to oblige an employee to make a report include, but are not limited to, market abuse (including insider trading and manipulation), money laundering, terrorist financing, theft, fraud, bribery and corruption, and irregularities in financial or non-financial reporting.

#### How to report

Employees can report matters to the dedicated whistleblowing mailbox, which is monitored by the Group Compliance department.

Group Compliance is responsible for ensuring independent and fair investigation of the reported matter is conducted by the appropriate and relevant stakeholders, and that any conflict of interest in the investigation is avoided.

DIB is fully committed to protecting employees who report misconduct in good faith. Employees should have confidence in this protection and not fear retaliation. Reports can also be made anonymously. A whistleblower's identity will be kept confidential and disclosed only on a need-to-know basis. Any employee who takes retaliatory action will be subject to disciplinary action under HR policies.



Regular awareness campaigns are conducted by Group Compliance to ensure that the policy is properly communicated and that employees are aware of their obligations and rights. New joiners are trained on the importance of and access to whistleblowing as part of their mandatory induction training. Then, mandatory training is completed on an annual basis to reinforce understanding.

Suppliers can report incidents through the Bank's postal mailbox.

# 3.6 Information Security Management System (ISMS)

The management of DIB recognises that information systems and information are valuable assets which are essential in supporting DIB's strategic objectives. Effective information security program at DIB is critical in order to ensure secure delivery of business services and to be the most progressive Islamic Financial Institution in the World. The management of DIB is highly committed to Information Security and to preserving the confidentiality, integrity and availability of all information assets.

#### **Objectives**

DIB's information security objectives are defined as follows:

- Implement proactive information security risk management;
- Continuously strengthen security capabilities and enhance cybersecurity resilience;
- Maintain robust identity and access governance;
- Foster a strong security culture and improve employee behavior; and
- Ensure compliance with legal and regulatory requirements.

#### Outcomes

DIB's information security program aims to achieve several key outcomes:

- Customer Trust: Maintaining confidence in DIB's information systems.
- **Risk Mitigation:** Reducing the risk of data breaches by continually enhancing the organisation's security posture.
- Access Control: Ensuring that only authorised individuals, processes, or systems access DIB's sensitive information.



- **Regulatory Compliance:** Meeting legal and regulatory requirements to safeguard customer trust and avoid legal consequences.
- **Third-Party Security:** Enhancing the security of third-party vendors and suppliers to prevent supply chain attacks.
- **Disaster Preparedness:** Protecting critical business processes from disruption and ensuring effective recovery in case of incidents.
- Incident Response and Recovery: Improving DIB's ability to respond to and recover from security incidents swiftly.
- **Human Error Mitigation:** Raising security awareness among employees to reduce the risk of incidents caused by human error.

# Governance and Leadership

The Information Security Department (ISD) leads the development and implementation of DIB's security framework. The Information Security Management Committee (ISMC) coordinates security management at the executive level, ensuring that policies align with DIB's business objectives and meet regulatory standards.

# **Risk Management and Compliance**

DIB's ISD conducts regular risk assessments to identify threats and vulnerabilities, both internal and external, to its information assets. A risk-based approach is adopted, ensuring that the security framework addresses potential threats and aligns with industry standards such as the UAE Information Assurance Standard (UAE IA), ISO 27001:2022, PCI-DSS, and SWIFT CSP.

# Incident Response and Vulnerability Management

DIB maintains a comprehensive incident response plan, tested biannually, to ensure the bank's readiness to manage and recover from security incidents. In addition, vulnerability scans are conducted monthly (internal) and quarterly (external), with penetration testing performed annually to identify and address security weaknesses.



# **IT Infrastructure Security**

DIB enforces strict access controls and uses advanced encryption technologies to secure its IT infrastructure. The bank's online and mobile banking platforms are protected through multi-factor authentication, antifraud systems, and secure development practices.

#### **Data Protection**

DIB safeguards personal information by implementing appropriate security measures such as access controls, encryption, authentication, secure disposal, monitoring, and awareness.

# Third-Party Security

DIB ensures that third-party vendors adhere to stringent security requirements, especially when handling data outside the bank's network. Encryption and monitoring protocols are enforced, and compliance with security measures is regularly verified through audits and contractual agreements.

# **Training and Awareness**

Annual security training is mandatory for all employees, with a strict 100% completion rate. This training raises awareness about individual roles in safeguarding DIB's information assets, thus reducing the likelihood of security incidents due to human error.

# **Continuous Improvement**

DIB's ISD continuously evaluates the effectiveness of its security framework through performance metrics and audits. Improvement initiatives are implemented to address any identified gaps, ensuring that the security program evolves with emerging threats and business needs.



# 3.7 Data Privacy

DIB is steadfast in its commitment to the protection of its customers. Our approach to Data Privacy is outlined in our Customer Consent Management Policy, which outlines guidelines, control, and procedures for obtaining, managing, and maintaining customer data within the Bank. The policy applies to the Bank's subsidiaries, affiliates, representative offices, agents, and any third parties including suppliers.

DIB has a dedicated Data Governance department who is responsible for the customer consent and data privacy as a whole. Data Governance sits under the broader Group Risk department, which has oversight at both the executive management level and board level.

In the case of a data privacy breach, DIB's formal disciplinary process will be followed.

#### What data do we collect from customers?

We collect data which can be used to identify our customers. Highest standards of security and confidentiality is maintained to safeguard our customer's data. We only collect personal data for lawful purposes directly related to the provision of the banking services under the Customer's relationship with the bank. We collect and process the data including (but not limited to):

- Full name;
- National identification or passport;
- Mobile/telephone number;
- Email address; and
- Biometric data

#### How and why is customer data collected?

The Bank collect the Personal Information of customers when entering into a banking relationship with them in order to provide them with the required services as effectively as possible. DIB collects and Process the Customer's Personal data only in accordance with his/her express Consent.

The Bank has a transparent process for obtaining customer consent which explains the purpose, scope, and consequences of providing consent, including the use of cookies. The Bank offers a range of consent options to accommodate individual preferences, including opt-in or -out.

In cases where dealing with minors, or people of determination as customer, additional measures will be taken to ensure consent is appropriately provided.



#### With whom is customer data shared?

The bank is required to share data with authorities in order to meet its regulatory and compliance obligations therefore it is important for the bank to disclose to the customers that their data is being shared only for lawful purposes. We do not sell our data to other companies nor do we expose this data to internal staff who do not have the necessary security privileges to access the data in line with their job profiles.

We place strict internal controls to effectively protect information and data against internal and external fraud. In addition to this, we work with third-party service providers to operate our service such as IT hosting services (only in the UAE). These third-party service providers may have access to or process customers' personal information as part of their service delivery.

We ensure that the protection and confidentiality of the data is not compromised through contractual agreements with third parties and putting controls in place to prevent unauthorised access, accidental loss and destruction.

#### How do we protect customers' data?

The Bank safeguards the Customer's personal information using the highest standards of security and confidentiality. The Bank will put in place strict internal controls to effectively protect information and Data, against internal and external frauds.

The Bank employs a rigid incident response plan to address any breaches or unauthorised disclosure of customer data promptly.

#### What are the customers' rights?

- Customers have the right to refuse to provide his/her Consent.
- The customer has the right to withdraw and/or revoke his/her expressed consent for processing data.
- The customer has the right to opt-in or out of receiving marketing material from the bank.
- The customer has the right to have his/her information corrected in the bank's systems.



#### 3.8 Employee Code of Conduct

DIB has established its vision and strategic direction and all employees are expected to adhere to the highest level of professionalism, integrity and ethical values. DIB's Employee Code of Conduct ("Code of Conduct" or "The Code") sets out the ethical values, standards and guidelines which Employees should adhere to in their dealings with internal and external stakeholders. The Code is underpinned by DIB core values. Adherence to the Code is the individual and collective responsibility of all Employees.

# Acknowledging the Code

Each employee is required to review the code thoroughly and sign an acknowledgment by confirming their understanding and commitment to abide by the outlined principles. This Acknowledgment is undertaken annually and serves as a formal agreement that employees will act in a manner consistent with the Bank's values, policies, and legal obligations.

The Code of Conduct is accessible to all employees through the bank's intranet or employee handbook, and it is the responsibility of each employee to familiarise themselves with its content and adhere to its guidelines.

New recruits acknowledge The Code immediately upon joining the Bank.

# Breaches of the Code of Conduct

DIB expects all Employees to act in full compliance with DIB's policies, procedures, standards, guidelines, and/or applicable statutory and regulatory requirements, including the requirements set out in the Code which is also consistent with the highest ethical standards.

Any failure to act in accordance with the Values or DIB's Expectations may, depending on the severity of the situation, result in disciplinary action, and may impact the employee's performance assessment or compensation.

Employees have the obligation to report all criminal or unethical conduct, suspicious activity or practices to their direct supervisor, Human Resources, Compliance, or through the channels defined in the Whistleblowing policy (see Section 4.5 of this document). In acknowledging the Code of Conduct, DIB Managers commit to instilling the values within their reporting structure, and reinforce and monitor employees' behavioral standards.



# Code of Conduct topics and scope

The standards set in DIB's Code of Conduct apply to all employees. The Code covers a comprehensive range of topics, including but not limited to:

- Fair treatment of customers
- Information, communication, and social media
- Respectful work environment
- Statutory and regulatory requirements
- Conflicts of interest
- Environmental stewardship & Human Rights
- Commitment and Accountability

#### **Review and Update**

To ensure the Code of Conduct remains relevant and up-to-date with evolving regulations and industry standards, DIB undertakes an annual review process to ensure the Code reflects the current expectations of the bank and provides clear guidance on emerging ethical and compliance issues.

#### 3.9 Discrimination and Harassment

Discrimination, harassment, or bias in any form is strictly prohibited under a zero-tolerance basis. Every employee has the right to a workplace that is free from harassment and discrimination based on race, gender, age, religion, disability, or any other protected characteristic.

Any discrimination, bullying or any form of harassment including but not limited to sexual harassment will be viewed seriously and will result in disciplinary action and may lead to dismissal. Use of defamatory, racially prejudiced or lewd remarks or words in any form or medium of communication is not permitted and will be viewed seriously and will result in disciplinary action and may lead to dismissal.

If witnessed or reasonably suspected, employees are encouraged to come forward and report instances of discrimination or harassment using the dedicated, protected whistleblower mailbox.

To prevent discrimination and harassment, and foster a culture of inclusion, the bank provides training and awareness programs focused on the importance of maintaining a respectful workplace and understanding unconscious biases.



# 3.10 Diversity, Equity, and Inclusion (DEI)

We are committed to fostering a diverse, equitable, and inclusive workplace where every individual is valued, respected, and provided with equal opportunities to thrive. Our DEI Policy is driven by the purpose of building a culture that embraces diversity, promotes equity, and ensures inclusion at every level of our organisation.

We recognise that a diverse and inclusive workforce not only enhances our ability to serve our customers effectively but also strengthens our innovation, resilience, and competitiveness in an ever-evolving financial landscape.

Our purpose is to create a workplace where all employees, regardless of their background or identity, can contribute their unique perspectives, skills, and experiences to our collective success while advancing the principles of equity, fairness, and social responsibility in all that we do.

DIB strives to promote equal opportunity throughout the employment journey, from recruiting and hiring, to learning and development, to compensation and benefits, and performance management.

#### Training and Awareness

DIB designed a curriculum to train all employees based on DEI principles, unconscious bias, cultural competence to promote awareness and create a better understanding of diverse perspectives and cultures. Managers receive additional training on how to foster an inclusive workplace.

# 3.11 Human Capital Development

The Bank regards employees as its most valuable asset and is committed to ensuring that Employees are equipped with the appropriate skills and capabilities to competently perform their job and advance in their careers. This is underscored by an approach to performance management which establishes a fair, consistent, and transparent approach to employee performance appraisal.

# Performance Management

The goal of DIB's Performance Management System is ultimately to enable each employee to perform to their fullest potential, while positioning themselves for optimal career development.



DIB employs a management-by-objectives approach to performance management. Employees set annual KPIs with their line manager, which are used to evaluate performance across three phases: planning, mid-year review, and year-end evaluations. Employees may tailor their KPIs based on their goals and expectations across a range of competency areas aligned with the Bank's core values.

#### Learning

Employees are encouraged to take ownership of their personal and professional development and actively participate in the learning activities. The HR department conducts a detailed, organisation-wide Learning Needs Analysis to roll out consolidated annual learning plans, which include mandatory and suggested learning paths for all employees.

DIB tracks and reports on annual training hours in its Sustainability Report.

# Growth & Development

The Bank aims to develop the skills and competencies of its employees to advance their career through a process of development dialogue, feedback, career support, and individually tailored development journeys.

Examples of such employee development programs include:

- Our **High Potential Program** identifies high-performing staff from various departments and invests in their leadership development through training, mentorship programs and networking workshops.
- Our **Transition Management Program** effectively support in managing and supporting key talents during their role change, ensuring a smooth transition and minimising disruption to their overall performance and productivity.
- Our **Women in Leadership Program** aims to spark an innovative mindset for the female leaders within our organisation, and empower them to shatter unconscious biases inherent in the workplace.
- Our Young Talent Management Program involves partnership with universities to provide students with opportunities for real-world learning and experience through workshops, internships, and mentoring programs.

Further, DIB invests in continuing executive education of talented employees, sponsoring enrolment in external online courses at prestigious institutions.



# 3.12 Employee Benefits and Wellbeing

DIB prides itself on the wide range of benefits offered to employees of all grades. We firmly believe that employee wellbeing is critical to satisfaction, retention, and DIB's overall reputation with internal and external stakeholders.

Below are highlighted some of the key benefits offered to DIB employees:

- Medical and life insurance coverage competitive in the market
- Child education allowance
- Club membership
- Leave travel allowance
- Residency permits and visa processing
- Preferential rates on staff finance to aid financial commitments

DIB provides employees with a flexible range of options for taking leave when required, such as:

- DIB employees are entitled to annual leave and are required to take 10 consecutive working days of leave every year, which is mandatory;
- Female employees are eligible for up to 60 days of maternity leave. Upon returning to work, nursing breaks are available to female employees.
- Paid leave available for employees intending to undertake the Hajj pilgrimage
- Paid leave is granted to employees as study leave to support their endeavor to further their education
- Paid leave is granted to employees as medical escort leave for accompanying family member for medical treatment

Additionally, DIB fosters a diverse, equitable and inclusive workplace extends beyond work-related activities. Social and Recreational Program is created to offer inclusive and enriching social and recreational activities where employees can connect, engage and celebrate. Employee well-being is promoted through additional, informal employee support programs, some of which are detailed on pg.23 of our 2023 Sustainability Report. This is in alignment with DIB's 2030 Strategic ESG Vision priority area of "Enhancing Employee Wellbeing".



# 3.13 Occupational Health & Safety (OHS)

DIB recognises that the health, safety, and security of our workforce is of the highest priority. We strive to operate within industry best practices and comply with applicable laws and regulations in the UAE. DIB acknowledges the clear connection between OHS and a positive environmental and social impact.

DIB's Safety, Security & Environment Policy, which is endorsed by executive leadership, including the COO and Group CEO, encompasses the physical and environmental security measures in place to ensure the safety and security of employees, customers, and visitors. Moreover, measures are outlined to ensure protection of the Bank's critical assets and sensitive information systems.

Incidents (such as accidents, injury, property damage, burglary, etc.) are investigated by DIB Safety & Security team and recorded in internal tracking systems to ensure necessary actions and accountability are taken. Incidents are escalated to relevant authorities as needed.

Management continuously monitors the health & safety management system, and evaluates effectiveness of the overarching Policy as needed. Relevant data and trends are closely observed by the responsible team in order to continuously evaluate program maturity and compliance with the prevailing legislative mandate.

Further, we believe that preparedness is the foundation of effective incident response. Responsible staff are thoroughly trained to fulfill their roles and responsibilities, which are crucial to maintaining the high levels of safety and security expected by DIB's staff, customers, and partners. Drills and simulations are frequently conducted to ensure preparedness across the organisation.

In July 2024, DIB proudly achieved ISO 45001 certification for its newly constructed Head Office in Dubai. The Safety & Security team is working hard to expand the coverage of this certification to more locations across the UAE. The Bank believes that this certification directly aligns with our Sustainability goals, and demonstrates a commitment to enhancing performance for the benefit of all stakeholders, including the environment.

# 3.14 Supplier Code of Conduct

DIB acknowledges that suppliers are an extension of our business, and that we are ultimately accountable for the conduct of the third parties with which we engage. As such, the Bank has established a Supplier Code of Conduct ("Supplier Code") that aligns with our own values and conduct standards.

The Supplier Code is clearly communicated to all suppliers, who shall read and agree to the conditions prior to entering into a contractual agreement with DIB. Suppliers are responsible for fulfilling the agreed



obligations, while complying with federal and local laws and regulations. By doing business with DIB, the supplier agrees to ensure its relevant representatives, employees, and subcontractors understand and comply with the standards set out.

At a high level, the Supplier Code covers the following major expectations from suppliers:

- Conduct business ethically, ensuring the avoidance of misconduct such as corruption, bribery, conflicts of interest, anti-competitive practices;
- Uphold DIB's fair treatment of customers;
- Show strict respect for human and labour rights;
- Comply with applicable environmental laws and regulations;
- Conduct business with respect for community rights;
- Maintain appropriate internal controls commensurate to risk profile;
- Safeguard confidential and proprietary information appropriately; and
- Maintain truthful and accurate financial practices

Suppliers and their employees are encouraged to speak up about any potential or actual wrongdoing by their own company, fellow employees, or DIB itself, and report concerns directly to DIB's Head of Regulatory Compliance. The DIB whistleblowing mailbox is available to suppliers wishing to come forward and voice a concern.

#### **3.15** Political Contributions

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

# 3.16 Responsible Product Development & Consumer Protection

DIB strongly believes that strengthening the confidence and trust of consumers in our institution through effective consumer protection is inextricably linked to the strength of DIB and the stability of the entire financial services industry.



DIB applies the principles of the CBUAE Consumer Protection Regulation and accompanying standards to any new or existing product, service, activity, or any other event or item that may have an impact on the customer. DIB understands that consumer protection starts at the top, and is committed to fostering a supportive and constructive corporate culture that promotes fair dealing with customers, protecting their rights, interests, assets, and information.

Under the Market Conduct Risk Framework, DIB has multiple policies in place, all ratified by the board, dedicated to consumer protection. These include the Code of Fair Treatment of Customers, Consumer Protection, Education and Awareness Policy, and the Consumer Product and Service Development and Management Policy.

DIB's Consumer Product and Service Development Policy adopts the principle that all fees and charges shall be reasonable and disclosed to Consumers. Further, all pertinent details of the Product (which includes charges and fees) are disclosed through the Schedule of Charges, Key Fact Statements, Terms & Conditions and Contracts. Sales personnel are required to provide clients with information on product risk by providing and explaining to customers the Key Fact Statements and warning statements.

Any third parties engaged by DIB to support the delivery of products and services are required to comply with these standards, and it is DIB's responsibility to conduct appropriate and proportionate due diligence prior to engaging with such third parties and monitoring these parties thereafter.

DIB's Code of Fair Treatment of Customers is publicly available on our website and is integral to the Employee Code of Conduct. The Code of Fair Treatment of Customers outlines the following principles:

- 1. Sharia compliance DIB is guided at all times by the principles of Sharia in all products, services and transactions that it offers.
- 2. Ethical conduct DIB is committed to adhering to the highest ethical standards, including but not limited to acting professionally, fairly, honestly, and with integrity at all times. This commitment is echoed in DIB's Employee Code of Conduct and the Customer Charter.
- **3. Transparency** DIB is committed to providing up-to-date, clear, accurate, and accessible information and disclosures about our products, services, and terms, including fees, charges, risks and limitations, and customer rights and responsibilities
- **4. Equality, respect, access** DIB is committed to fostering a supportive and inclusive banking environment where customers feel valued and secure are treated equally with dignity and respect.
- 5. Privacy and data security DIB is committed to protecting customer privacy and implements robust security measures to safeguard customer data and comply with all applicable data protection regulations



- **6. Complaints as feedback** DIB is committed to treating all complaints seriously ensuring customers receive timely responses and fair resolutions of their complaints. DIB is also committed to improvement of products, services and processes considering insights from complaints handling.
- **7.** Ethical and Sharia-compliant products and services DIB is committed to ensuring products and services are ethical, understandable, transparent, Sharia-compliant and designed and marketed in a responsible manner.
- **8. Service standards** DIB is committed to monitoring its service standards to ensure customers receive a consistent and reliable service.
- **9.** Swift correction and fair of errors and omissions DIB is committed to addressing errors and omissions and taking measures to prevent their reoccurrence.
- **10. Education and Awareness** DIB is committed to educating customers about their rights and responsibilities and enhancing awareness in relation to financial and banking matters.

Finally, DIB takes a systematic, disciplined approach to product development that spans the lifecycle from pre-development to post-implementation. This process is designed to proactively identify risks within the products and services, and quickly provide amendments and updates based on market feedback.

# 3.17 Tax Transparency

Tax transparency and compliance are integral to our values, maintaining a balance between following tax rules, acting ethically, and fostering sustainable development. We take our responsibility seriously, contributing our fair share to support public services and community well-being. Committed to transparency, we actively engage with local and international (tax) government authorities, business partners, and employees. Adhering rigorously to the letter and intention of all relevant laws, our tax strategy aligns seamlessly with changing global rules, and we commit to paying the share of taxes commensurate to the business activities and value derived from each jurisdiction. Upholding the highest standards of integrity in tax compliance and reporting is essential, showcasing our dedication to being open and accountable. Navigating the complex world of taxes, we remain true to our commitment creating a fair, ethical, and sustainable financial system, reflecting our broader ESG principles.

The Tax department manages all tax matters and follows a three-line defence model across the organisation, involving data entry and accounting operation teams. The Tax department is responsible for tax compliance and periodic internal monitoring of tax governance.



This is an evolving document that will be periodically updated in line with the underlying Bank policies.