



بنك الإمارات دبي الوطني  
Emirates NBD

Emirates NBD Group

# Anti-Bribery & Anti- Corruption Policy Summary

Friday, 6 September 2024

## Anti-Bribery & Corruption Policy

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

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

### All Group employees and associated third parties are prohibited from:

- Offering, suggesting, or paying a bribe<sup>1</sup> or authorising the offering, suggestion, or the payment of a bribe;
- Soliciting/Accepting a bribe to influence a decision, to obtain unauthorised access to confidential information, to commit or omit to do an act, whether or not the outcome would have been the same without the bribe;
- Making facilitation payments<sup>2</sup>. This includes facilitating such payments on behalf of customer.
- Using another party (i.e., intermediaries or agents) or acting as intermediaries to conduct any of the above;
- Using third-party service providers who are identified to have poor standards on Bribery and Corruption management;
- Processing funds known to be, or reasonably suspected of being the proceeds of bribery or corruption<sup>3</sup>.

### As per the ABC Policy:

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

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

#### Definitions:

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

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

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



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### **Our position towards gifts**

A gift is an item for which financial payment is not required and is usually given by business contacts or customers as a token of appreciation or as a means of expressing normal business courtesies. This applies to all gifts including but not limited to goods, services, discounts, non-business entertainment, personal travel or lodging, or any other arrangement that may benefit the individual recipient. Group employees should not give or offer a gift to, or accept a gift from, anyone with whom the Group conducts business wherein such a gift would exceed the customary courtesies associated with accepted general commercial practice. Employees may accept gifts of nominal value only (generally less than AED 1000 or USD 275) where receipt of the gift will not affect the employee's independent judgement in their Group's work. Our employees need to annually acknowledge compliance with the policies governing bribery, corruption, conflict of interests and related aspects.