

Abu Dhabi Islamic Bank

Whistleblowing Policy Statement

Abu Dhabi Islamic Bank and its subsidiaries, controlled affiliates, and international branches (“ADIB Group” or “The Group” or “ADIB”) are committed to leading international practices, which include conducting all Group businesses with honesty and integrity by complying with all applicable laws against corporate wrongdoing, corruption, fraud, bribery, offenses, and infringement of policies and procedures in every jurisdiction the Group operates in. All employees of the Group are expected to maintain the highest possible ethical standards and report in good faith any suspected, alleged, or actual misconduct or malpractices that fall short of these fundamental principles.

Objectives

The Whistleblowing Policy (“WB Policy”) outlines ADIB Group’s framework on whistleblowing as a channel to report issues that (potentially) affect the integrity of the organization and the reputation of ADIB Group. WB Policy fits within the core values of the Group and its Code of Conduct. Misconduct and malpractices negatively affect the integrity of ADIB and could have severe consequences for individuals or society. It is essential for the Group to be aware of any (potential or suspected) misconduct and malpractices to address, mitigate, and prevent them in the future. The WB Policy:

- Strengthen the culture of transparency and trust within ADIB Group and encourage employees and third parties to report in good faith any severe concerns or suspected, alleged, or actual misconduct or malpractice, when they become aware of.
- Provide opportunities for all employees and third parties to raise allegations and receive feedback on any actions taken.
- Protect employees against false claims of wrongful misconduct. Any communication that is proven to be either unsubstantiated and/or made with knowledge of its falsity is not protected by this WB Policy.
- Provide an independent and secure means for Whistleblower to make complaints, with proper management and timely resolution, and safeguarding them from possible retaliation.

Scope

The approved WB Policy applies to all employees of the ADIB Group, including all branches and subsidiaries, its management, and all other parties (e.g. consultants, third-parties, service providers) associated with the Bank. All subsidiaries/branches are required to ensure compliance with their local obligations and wherein the local regulations differ, the more stringent requirements should be applied and adhered to. The WB Policy is designed to allow employees and third parties to raise a “Reportable Conduct”.

Key Principles

The key principles governing the WB Policy constitutes of:

- **Protection of confidentiality** – Protection of confidentiality is a cornerstone of the WB Policy. All parties involved in the whistleblowing process should treat the information confidentially and with utmost care. All the data that is saved digitally and/or physically is only accessible to the persons directly involved in the reporting and investigation process on a ‘need to know’ basis. The identity of the reporting person and other details of the report are treated confidentially and are protected through all stages of the investigation process.

- **Prevention of victimisation and non-retaliation principle** – The protection of employees is of utmost importance to the Group. No member of staff who has reported matters in good faith and in compliance with the provisions of this WB Policy will be subject to any act of retaliation as a result of such action. For the purpose of this WB Policy retaliation is defined as any action, or threat of action which is unjustly detrimental to the Whistleblower because of his/her report, including, but not limited to dismissal, discrimination and acts of vindictiveness (direct or indirect), intimidation, harassment, threats of violence, unwarranted disciplinary action, victimisation, taken against the Whistleblower.
- **Reporting in good faith** - Good faith means the unequivocal belief in the truth of the reported whistleblowing incident. If it later turns out the information was not true, but the report was made in good faith, the Whistleblower is still protected from retaliation.
- **Protection of accused persons** – When an investigation finds no evidence of misconduct against the person who has been reported, that person will be protected from any adverse effects. The same protection should apply for persons that are subjected to reports made in bad faith. ADIB will protect the person(s) concerned from unintended adverse effects that go beyond the objective of the measure taken even when evidence (supporting the whistleblowing report) is found, and actions are initiated.
- **Anonymous reporting:** ADIB Group is strongly committed to protecting the identity of those who made reports in good faith and the Group’s non-retaliation principle, as described above. A strong framework is also in place to protect employees who file a report under this WB Policy. The WB Policy encourages all concerned to put their names to their allegation whenever possible. If individuals choose to report their concerns anonymously, such anonymity will be respected.

Reportable Conduct / Misconduct

Reportable Conduct is a conduct that is illegal, unacceptable, or undesirable. It includes but is not limited to:

- Criminal offense, including fraud, money laundering, embezzlement, bribery, breach of trust, abuse of public functions or authorities, damage to public property and the concealment of the proceeds of any of these crimes;
- Infringement of ethics or integrity;
- Failure to comply with legal obligations for instance, by making misleading or deceitful statements to the authorities or the Group management, self-dealing, not disclosing related third-party transactions, accepting bribes or kickbacks, aiding or not reporting incidences of money-laundering or unauthorised disclosure of confidential information;
- Endangering the health and safety of any person;
- Fraudulent or unethical (suspicious or actual) activities committed or likely to being committed;
- Suspicious or actual violation of the law and/or Group’s ethical and other policies and procedures;
- Acts that may jeopardise ADIB’s IT systems;
- Manipulation of the product program process to reflect an incorrect picture, e.g., inflated product sales to achieve targets or incentives or bonuses;
- Acting outside financial accounting, reporting, and auditing standards;
- Any of the above are being, or are likely to be deliberately concealed;
- Actions outside the scope of any individual’s authority and actions that could (potentially) harm the reputation of the Group.

Whistleblower Responsibilities

The Whistleblower will have the obligation to:

- Ensure credibility in reporting by avoiding rumors and allegations that are not based on facts, and report whenever real and reasonable information indicating a suspicion of violations is found;

- Avoid malicious reports aimed at defaming others, taking reprisal or retaliation against them, or undermining confidence in the financial institution, its employees or stakeholders;
- Exercise due diligence by ensuring accuracy in reporting, providing all necessary details relating to the case reported, and attaching all documents containing details and evidence as required by the nature of the violation;
- Report violations as soon as possible;
- Maintain full confidentiality of the report for the good of the financial institution; and
- Bear the responsibility for malicious allegations that defame or damage the financial institution or any of its employees or stakeholders.

Filing a Whistleblowing Report

A whistleblowing report can be filed via the designated channels as described below:

- E-mailing to Hotline e-mail: WbHotline@adib.ae
- Using the appropriate link available on the ADIB intranet site, <http://intranet.adib.ae/>
- Using the appropriate link available on the ADIB website, www.adib.ae

The Whistleblowing Report should contain adequate information to substantiate the concern and allow an appropriate investigation to begin. The complainant should provide at a minimum:

- a. Brief details of detected / suspicious allegation along with any relevant evidence, if available
- b. Name of parties involved along with date and time (where possible);
- c. How the matter was detected; and
- d. Other relevant information.

Training and Awareness

All Heads of Department are responsible for ensuring that their staff is aware of the WB Policy and process and that any training needs are addressed which may arise from the application of the WB Policy. All staff will receive induction and annual mandatory e-learning refresher training with respect to the underlying guidelines of the WB Policy to raise an adequate level of awareness. It is the responsibility of all staff to ensure that they are aware of and understand the Bank's policy in relation to Whistleblowing.

Date: 12/06/2023