

Commercial Bank of Dubai (“CBD” or “the Bank”) is regulated by the Central Bank of the UAE (“CBUAE” or “Central Bank”) and is listed on the Dubai Financial Market. CBD and its subsidiaries are committed to upholding ethical business practices and to maintaining compliance with applicable Anti-Bribery and Corruption laws and regulations.

The Bank enforces a zero-tolerance stance towards bribery and corruption in any form. It does not allow the giving, offering, promising or receiving of bribes in any form by any person. Further, CBD prohibits any political involvement, including lobbying and political spending, in accordance with the laws and regulations of the UAE.

CBD’s Anti-Bribery and Corruption (“ABC”) Policy contains essential guidelines for employees to uniformly address the risks of bribery and corruption. It sets forth roles and responsibilities of key stakeholder groups across the Bank, as well as formal policies and procedures to identify and prevent bribery and corruption attempts, and to report and address suspected bribery and corruption events. In addition, the policy provides guidelines related to conflicts of interest<sup>1</sup>, vendor and third-party due diligence, interactions with public officials, recruitment and internships, gifts and entertainment, and charitable contributions and sponsorships.

The provisions defined in the Bank’s ABC Policy apply to all CBD employees, including trainees, contractors, and other external and temporary staff, across the Bank’s business segments and subsidiaries, as well as to third parties who provide services to the Bank or act on its behalf.

All employees must comply with the ABC Policy and report any suspected violations immediately. Any breach of this Policy by employee(s) or associated third-party(s) may result in disciplinary action by the Bank, including termination of employment or service arrangement(s), and may include criminal or regulatory proceedings against the individual(s).

**All employees and associated third parties are prohibited from:**

- Offering, suggesting, or paying a bribe, or authorising such actions.
- Soliciting or accepting a bribe to influence a decision, gain unauthorised access to confidential information, or perform/omit an act, regardless of whether the outcome would have been the same without the bribe.
- Making facilitation payments<sup>2</sup>, including facilitating these payments on behalf of customers.
- Using third-party service providers with inadequate standards in bribery<sup>3</sup> and corruption<sup>4</sup> management.
- Processing funds that are known or suspected to be the proceeds of bribery or corruption.

<sup>1</sup> Conflicts of interest are situations of actual, potential, or perceived conflicts between the duty and private interests of a person, which could improperly influence the performance of his/her duties and responsibilities.

<sup>2</sup> Facilitation payments are financial payments that may constitute a bribe when made with the intention of expediting an administrative process or securing a routine government action by an official.

<sup>3</sup> Bribery is defined as giving someone a financial or non-financial advantage to encourage that person to perform his or her functions or activities improperly or to reward that person or person’s friend or a family member for having already done so. This could cover seeking to influence a decision-maker by giving some kind of extra benefit to that decision maker rather than what can legitimately be offered. When an employee of the Bank Offers, promises, or gives an advantage it is considered as active bribe and when an employee requests, agrees to receive, or accepts a bribe is considered as passive bribery.

<sup>4</sup> Corruption is defined as the misuse of public office or power for private gain or misuse of private power designed to influence an individual in the performance of their duties and induce them to act dishonestly. Often, but not always, bribery is a vehicle for, and the enabler of, further corrupt behaviour.