

The Commercial Bank of Dubai (“CBD” or “the Bank”) is committed to maintaining the highest standards of integrity and transparency in all its operations. We encourage our employees as well as customers, contractors and third-party service providers to speak up freely and report any actions or behaviours that violate our values, laws, regulations, or policies.

The Whistleblowing Policy is an essential component of the Bank’s Corporate Governance Framework and Risk Management Framework, designed to encourage and enable CBD employees, customers, and third parties to speak up freely and report potential or actual instances of wrongdoing, misconduct, unethical behaviour, or illegal activity within the Bank or relating to the Bank, which otherwise would have a detrimental impact on the image, reputation or assets of the Bank and its stakeholders, without fear of retribution. It sets the procedures for the reporting party to anonymously disclose any concerns or suspicions regarding possible violations of applicable laws or regulations, or of internal Bank’s policies, standards, or procedures, including CBD’s values. The policy applies to all CBD staff members (permanent, contractors, and other external and temporary staff) as well as third parties, such as vendors, third party service providers, freelancers, volunteers and trainees, who have entered contracts with the Bank.

Incidents, events and/or malpractices that are reportable under the policy may include, but are not limited to:

- Insider Trading;
- Unethical Conduct/Behaviour;
- Conflicts of Interest;
- Breach of Confidentiality;
- Money Laundering/Terrorist Financing;
- Theft or Damage of Physical Equipment;
- Theft of Data, Information, or Passwords;
- Fraud or Fraudulent Practices, whether External or Internal;
- Bribery and Other Types of Financial Malpractice or Impropriety;
- Discrimination, Harassment and / or Retaliation Against Any Employee;
- Misrepresentation of the Bank’s financials and / or final positions, including unacceptable accounting standards and disclosure practices, and
- Any other conduct which the reporting party reasonably believes to be a violation of UAE employment rules, labour laws, CBUAE regulations, DFM and SCA rules, as well as all regulations that may in the future come into effect, including the Shari’a Islamic regulations (as applicable).

Key provisions (safeguards) contained in the Whistleblowing Policy:

- **Employee Protection:** Any Bank employee reporting matters under the provisions of the policy should always be doing so with good intentions towards the Bank and in good faith and not for their personal gains or motives or for the malicious reporting of others. On this basis, the Bank is committed to protecting employees who report concerns in good faith from any form of retaliation, including discharge, demotion, suspension, harassment or other form of discrimination.



- **Confidentiality:** All disclosures made under the provisions of the policy will be treated in a discrete, confidential, and sensitive manner, and the identity of the whistleblower will be protected unless required by law.
- **Anonymity:** While anonymous reports are accepted, a concern expressed anonymously is less powerful and is often more difficult to investigate. Saying that, the Bank will not differentiate its treatment of disclosures made under the provisions of the policy depending on whether they have been made anonymously or openly.
- **Non-Retaliation:** CBD will not tolerate any form of retribution or retaliation against any whistleblower. Any attempts of retaliation against the whistleblower will result in disciplinary action, if such attempts of are reported and proven.