

HUMAN RIGHTS POSITION STATEMENT



June 2025

Progress Never Stops...

HUMAN RIGHTS POSITION STATEMENT

Introduction

DIB is committed to respecting and upholding human rights in all aspects of our operations and business relationships. This Human Rights Statement reflects our dedication to conducting business in a manner that is ethical, responsible, and aligned with international human rights principles and standards.

DIB recognises that, as a progressive Islamic financial institution, we have a role to play in promoting and protecting human rights. Through financing and investing decisions, we influence economic and social conditions in the market, and therefore have a significant responsibility to put appropriate processes in place. We are guided by the principles of Sharia, which serve as the ultimate authority in shaping our approach to human rights, upholding values such as the sanctity of life, justice and equity.

Our approach reflects alignment with local applicable laws/regulations, including but not limited to The Constitution of the United Arab Emirates (UAE), and UAE Labour Law (i.e. Federal Decree-Law No. (33) of 2021 Regarding the Regulation of Employment Relationships).

In addition to local applicable laws/regulations in respective jurisdictions, we use internationally recognised standards to define and design our approach to human rights to the extent aligned with the principles of Sharia as guided by the Higher Sharia Authority of CBUAE and Internal Sharia Supervision Committee of our DIB

- Our definition of human rights relies on the Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work to the extent aligned with the principles of Sharia as guided by the Higher Sharia Authority of CBUAE and Internal Sharia Supervision Committee of our DIB.
- Our approach to respecting human rights follows the principles and recommendations of the International Labour Organization's (ILO) Core Conventions and the United Nations Guiding Principles on Business and Human Rights to the extent aligned with the principles of Sharia as guided by the Higher Sharia Authority of CBUAE and Internal Sharia Supervision Committee of our DIB.
- We are signatories to the United Nations Global Compact and use the underlying principles and framework to continually improve our human rights practices to the extent aligned with the principles of Sharia as guided by the Higher Sharia Authority of CBUAE and Internal Sharia Supervision Committee of our DIB.

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Our Commitment

To meet our responsibility to respect and protect human rights, DIB recognises the following:

- **Compliance with employment law:** We will comply with applicable employment laws, including without limitation, laws regarding minimum wage, working hours, overtime, hours free from work, acceptable living conditions, health and safety, and human rights.
- **Safe and healthy work environment:** We will ensure that we provide a hazard-free environment, with proactive health and safety measures in place, supported by training and risk assessments.
- **Fair and inclusive work environment:** We strive to provide a culture free of discrimination and harassment. We value diversity and inclusion, and we provide equal opportunities to individuals regardless of gender, age, race, religion, disability or background.
- **Protection of vulnerable groups:** We are committed to safeguarding the rights of People of Determination (PODs) by fostering an inclusive, accessible, and respectful environment that enables their full and active participation.
- **Forced and child labour:** We uphold the rights of our employees to fair labour practices, including the right to safe conditions free from exploitation. DIB strictly prohibits forced labour, child labour, and any form of workplace discrimination.
- **Data privacy and protection:** We respect the right to privacy and are committed to safeguarding personal data of our employees, customers and partners.
- **Standards for third parties:** We expect our suppliers and business partners to share and uphold our commitment to human rights. DIB will ensure that we are not complicit in human rights abuses and take appropriate action to address any violations. Our prerequisites and standards are acknowledged by suppliers in the Supplier Code of Conduct.
- **Compliance and Grievance Mechanisms:** Grievance mechanisms are available for employees to report human rights concerns safely and confidentially. The availability of these mechanisms is freely and frequently communicated to all relevant stakeholders.

Related policies are summarized in [Key Statement Disclosure – DIB Policies](#).

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Strategies for Implementation

Much like our overall ESG agenda, DIB's commitment to upholding universal human rights is unwavering as we continue to progress on this journey. While our statements unequivocally reflect our intent, we are actively developing formal governance structures, risk-based due diligence mechanisms and measurable performance indicators to support implementation.

We will implement our human rights commitments through the following activities:

- **Governance:** Define approach to human rights governance and integrate into our governance structures, including the Board Sustainability Committee (BSC), Board Risk, Compliance, and Governance Committee (BRCCG), Board Nomination and Remuneration (BNRC), Management Sustainability Committee (MSC) and Risk Management Committee (RMC). Ensure collaboration, communication, and accountability across the organisation.
- **Policy Integration and Training:** Systematically integrate human rights impact considerations into our business policies and procedures. Conduct regular training for employees on human rights principles tailored to job roles, risk exposure and their application in our business operations.
- **Risk Assessment and Due Diligence:** Implement robust due diligence processes to identify, prevent, and mitigate human rights impacts and risks in our operations and business relationships. Regularly assess and monitor potential human rights impacts.
- **Stakeholder Engagement:** Understanding the importance of stakeholder perspectives in identifying and addressing human rights issues, DIB commits to engaging openly and transparently with our employees, customers, suppliers, and the communities in which we operate, by fostering dialogue and encouraging feedback.

Human rights risks exist across our organisation's value chain. As such, DIB understands the need to implement structured processes and enforce relevant requirements that reflect the scope, complexity, and context of our operations. DIB shall ensure the ongoing implementation of this position statement by identifying and embedding appropriate actions within risk management policies, internal procedures, and governance frameworks.

This commitment extends to the integration of human rights principles across all areas of the business, including operations, group entities, suppliers, and clients. By embedding these considerations into the broader policy environment, DIB seeks to promote a consistent, values driven approach to human rights.

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Monitoring, Review and Continuous Improvement

In line with our ESG Risk Policy, human rights monitoring will be embedded within the three lines of defence, which provides structured oversight, accountability, and risk-based monitoring alongside independent review by Group Internal Audit. We will regularly review the effectiveness of our policies and implementation approach to ensure alignment with international standards, stakeholder expectations, and evolving best practices.

We will:

- Monitor progress across our operations and value chain through ongoing assessments of key human rights areas, including employee awareness, supplier and client engagement, and integration into business processes.
- Where potential human rights impacts are identified, ensure that robust mitigation measures are implemented.
- Stay informed about evolving standards and stakeholder expectations and actively seek opportunities to enhance our contributions to human rights protection.
- Embed human rights considerations into our broader governance management frameworks to support informed decision making at the strategic level.

This position statement will also be reviewed annually to ensure it remains current, effective, and responsive to emerging human rights risks and regulatory developments.

Approval

This position statement has been approved by the DIB Board of Directors, Board Sustainability Committee, Group CEO, Management Sustainability Committee and Internal Sharia Supervision Committee.

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Annexure

Progress of Implementation Across the Value Chain

The implementation of human rights considerations across the value chain is an evolving process. Our approach continues to develop as we align with regulatory expectations, stakeholder needs, and best practices. The table below provides an overview of current progress and planned actions across policy integration and training, risk assessment and due diligence, and stakeholder engagement.

Activity	Own operations	Group entities	Suppliers	Clients
Policy integration & training	In progress - systematically updating DIB UAE and group policies and integrating into mandatory training.	Planned - establish robust ESG Governance structures at the subsidiary level.	In progress - human rights requirements included in supplier code of conduct, planning supplier engagement session.	Planned - roadmap to engage clients in high-risk sectors
Risk Assessment & Due Diligence	In progress - Risk assessment and due diligence in process under approved ESG Policy - Credit Risk Appraisal	In progress - Risk assessment and due diligence in process under approved ESG Policy - Credit Risk Appraisal	Planned - supplier ESG risk is currently assessed as part of sustainable procurement process; implement deeper, risk-based due diligence as an extension of current process	Planned - clients currently assessed as part of ESG Scorecard evaluation; implement deeper, risk-based due diligence as extension of current process
Stakeholder engagement	In progress - Stakeholder engagement takes place on an ongoing basis and is expanded upon through our Double Materiality Assessment.			

