

Staff Complaint, Grievance, and Non-Retaliation Policy Statement

January 2024

Introduction

National Bank of Kuwait (“NBK” or “the Bank”) is committed to responsible employment and to promoting a safe and healthy work environment for our employees. The Staff Complaint, Grievance, and Non-Retaliation Policy was put in place to foster a culture of transparency and trust and to encourage and facilitate the reporting of complaints and grievance cases. The Policy aims to ensure that employees are treated fairly and without discrimination regardless of gender, race, color, language, religion, political opinion, or other status (e.g., age, disability).

NBK encourages its employees to speak up openly and to raise concerns about actions and behaviors that go against the Bank’s values and policies. NBK encourages employees to feel safe and confident in using the channels designated to escalate their concerns.

Raising Concerns

The Policy promotes a clear and effective way of raising any complaint or grievance and guarantees that necessary steps shall be taken to safeguard and protect the individual and professional wellbeing of the concerned employees. A complaint / grievance can either be formal or informal. A formal complaint or grievance case should be reported to the Employee Relations Unit by submitting an official form which then will be raised to an internal committee to review and recommend an unbiased decision. NBK ensures that investigations of complaints and grievance cases are carried out thoroughly, independently and in a timely manner by the appropriate subject matter experts.

In the case of informal complaints and grievances, the issue can be raised without submitting an official form. In this case, it should be addressed to the direct manager and/or Group Head before escalating it into a formal process. Below is the process workflow:



Confidentiality

The Bank has in place appropriate procedures to maintain the confidentiality of the individual raising the concern. Raised concerns will strictly be treated in a confidential manner, to the extent possible.

Types of Raised Staff Complaint / Grievance Cases

Complaint and grievance cases are categorized under four main categories:

1. **Discrimination:** Based on the treatment or consideration of, or making a distinction in favor of or against, a person or group of persons based on gender, race, color, language, religion, political opinion, or other status (e.g., age, disability) to which that person or group of persons belongs rather than on individual merit.
2. **Harassment:** Based on the act of systematic and/or continued unwanted and annoying actions of one party or a group, including threats and demands, including but not limited to:
 - Telling insulting jokes about racial groups.
 - Sending explicit or sexually suggestive emails
 - Making derogatory comments or taunts about someone's race or religion.
 - Physical abuse.
 - Verbal abuse.
 - Yelling, screaming or offensive language.
 - Excluding or isolating employees.
 - Intimidation.
 - Giving employees impossible jobs.
 - Undermining work performance by deliberately withholding information vital for effective work performance.
3. **Performance Assessment:** Based on employee end of the year performance and to be considered case-by-case.
4. **Others:** According to NBK Group Human Resources -Employee Relations Team assessment, and to be considered case-by-case.

Protection

Non-retaliation, which is defined as all negative and hostile actions against an employee that come as a result of raising a concern or a complaint to management or the Human Resources personnel, measures have been put in place to address:

- Unjustified poor work evaluation and demotions.
- Unjustified deduction of benefits.
- Defamation of character.
- Victimization.
- Unjustified warnings or punishments.
- Unjustified terminations and/or suspensions.
- Exclusion from organizational events and gatherings.
- Creating a hostile or intimidating work environment.

Non-retaliation aims to ensure fairness of evaluation and provide the employees with the space to express their feedback freely on any inconsistencies or wrongdoings and to mitigate any legal risk for the organization that may stem from wrongdoings.

Non-retaliation is implemented through:

- **Policy:** NBK has in place a non-retaliation policy that provides a structural approach towards addressing issues related to the above.
- **Communication:** NBK communicates and educates employees on non-retaliation.
- **Disciplinary Actions:** NBK imposes penalties for retaliating against an employee following complaints, in addition to disciplinary actions following false complaints which can be assessed and determined by the Grievance Committee as per the policy, and in accordance with Kuwait Labor Law.

- **Non-Retaliation Acknowledgement Form:** An acknowledgement form shall be signed by all employees involved in the grievance process to ensure sound application before hearing process.

NBK does not condone or tolerate any harassment or victimization or acts of retaliation against those who raise complaints or grievance cases and will take appropriate action to protect those who raise a concern in good faith.

Associated Policies

- NBK Statement on Protecting and Advancing Human Rights 2020.
- NBK Group Whistleblower Policy.
- NBK Group Code of Conduct.