

NBK Group Statement on Whistleblowing Procedures

September 2024

Introduction

The National Bank of Kuwait Group (NBK Group or “Group”) is committed to the highest standards of good governance, transparency, honesty, integrity and accountability. The Group has implemented a whistleblowing process to foster a culture of transparency and trust and to encourage and facilitate the reporting of any misconduct to the designated authorities within the Group so that appropriate corrective action can be taken.

NBK Group encourages its employees to speak up openly and to raise concerns about actions and behaviors that go against the Group’s values, break the law, or breach regulations or policies. The Group encourages employees to feel safe and confident in using the channels designated to escalate their concerns.

The Whistleblowing policy is updated annually after being reviewed and approved by the Corporate Governance committee and Board of Directors. The policy is available and accessible to all NBK staff on NBK portal, further to that the policy is provided through 10 induction courses for new hires that stress on our regulations and legal standards.

Raising Concerns

A range of secure and protected channels are available to report concerns e.g. NBK Intranet directly to Board of Directors Chairman, email, telephone, filling the Whistleblowing Form and face to face. All concerns, regardless of reporting channels used, will be raised to Board of Directors Chairman.

Types of Concerns

This is not an exhaustive list:

- Legal or regulatory non-compliance;
- Criminal activity such as theft, fraud, bribery, corruption, abuse of assets or tax evasion;
- Health and safety concerns and environmental issues;
- Sexual harassment, racism or other illegal discrimination;
- Business misconduct, or malpractice that impact customers, colleagues or the Group;
- Unethical behavior or misconduct, including breaches of the Group’s policies and code of conduct;
- Confidentiality and security breaches;
- Deliberate falsification, concealment, destruction or use of falsified documentation, or intended for use;
- Questionable accounting or auditing practices; and
- Other behavior which is contrary to the Group’s values and /or compliance standards.

Confidentiality and Anonymity

The identity of the reporter is treated confidentially as much as possible. The Group has in place appropriate procedures to maintain the confidentiality and/or anonymity of both the individual raising the concern and the subject. Concerns will be treated in a confidential manner, to the extent possible. The Group may, if appropriate, disclose a possible violation and any information relating to third parties, including regulatory, governmental, or law agencies.

Protection

The Group prohibits retaliation against any individual who, based on a reasonable belief that a possible violation or suspected wrongdoing has occurred, is ongoing or is likely to occur, makes a report or provides information.

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

Investigation Standards

The Group has in place comprehensive procedures for the investigation of cases/concerns reported. The Group ensures that investigations into all concerns are carried out thoroughly, independently and in a timely manner by the appropriate subject matter experts.

Procedures for handling Whistleblowing Reports

There is a detailed procedures for handling whistle-blowing report in place, where under the oversight of BOD Chairman the investigation committee shall arrange to inquire into the allegation raised by the Whistle-blower such that he or she can establish facts to his or her full satisfaction. In addition, The BOD Chairman may authorize the Investigation Committee or the Board corporate governance committee or any other Executive Management personnel such as the Group Chief Compliance and Governance Officer to investigate the matter. The Board Chairman will instruct Board Secretary to start informing and involve other staff on a “need to know” basis to the extent necessary to successfully investigate the allegation.

Within five (5) working days upon receiving the Whistle-Blower report, the Board Chairman will instruct Board Secretary to write to the Whistle-blower to acknowledge that the concern has been received. Upon conclusion of the investigation into the allegation, the Whistle Blower will be updated on the investigation outcome

The Board Secretary should advise the Board corporate governance committee with the number of Whistle-Blower reports received and the outcome of the investigations on a regular basis, and the number of reports (if any) will be reflected in the sustainability report.

Associated Policies

NBK Group Code of Conduct

NBK Group Anti-Money Laundering and Combating Financing of Terrorism

Policy NBK Group Anti-Fraud Policy

NBK Group Anti-Bribery and Corruption

Policy NBK Group Whistleblower Policy